



Raleigh

MEMO

TO: Raleigh Transit Authority (RTA)
Finance and Policy Committee

FROM: Morgan L. Simmons, Senior Transit Planner

DATE: February 2, 2022

SUBJECT: Service Equity Analysis for the Proposed New Hillsborough Route (Route 9)

HISTORY OF THE SUBJECT:

☒ ***New Agenda Item***

In accordance with Title VI requirements of the Civil Rights Act of 1964, the Federal Transit Administration (FTA) Circular 4702.1B, and Executive Order 12898, transit providers are required to evaluate any proposed service changes to determine whether minority and low-income populations will be disproportionately burdened by the changes. This is referred to as a Title VI Service Equity Analysis or 'service equity analysis'.

If approved by the Raleigh Transit Authority (RTA), GoRaleigh will add a new high frequency route to the system, serving the Hillsborough area. The service equity analysis included:

- Review of proposed new route service area,
- Assessment of minority and low-income populations within the transit service area, and
- Assessment of planned service changes, to determine whether it may have a disparate impact on minority populations or disproportionate impact on low-income populations.

Findings:

- The Hillsborough Route is a new service added to the system, and thus constitutes a **major service change**.
- Impacts of adding service to the corridor are **anticipated to be positive to mobility and accessibility**.
- The new route will **serve minority populations at a rate lower than the GoRaleigh system average** (30.2 percent vs 44.9 percent, respectively).
- The new route will **serve low-income populations at a rate higher than the GoRaleigh system average** (25.7 percent vs 20.1 percent, respectively).
- While **direct negative impacts to minority populations are not anticipated**, there is potential for a disparate impact to minority populations who may have lower relative opportunity to benefit from the positive changes from introducing new service.

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- **Low-income populations may experience disproportionate positive benefits from the proposed service;** this may reflect the university populations positively benefitting from the new service (North Carolina State University and Meredith College).
- As the agency has done in the past, **GoRaleigh should continue to balance service additions throughout diverse neighborhoods and communities** across Raleigh through application of an equitable transit framework and reviews.
- **Planned outreach for the proposed service should include specific efforts** to engage with minority and low-income populations and incorporate their input into service plans.

ACTION REQUESTED:

Action Item- Staff request review of the Service Equity Analysis for the Proposed New Hillsborough Route (Route 9).

ATTACHMENT:

Attachment A- Service Equity Analysis for the Proposed New Hillsborough

GoRaleigh Hillsborough Package Title VI Service Equity Analysis

October 2021

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Key Findings

GoRaleigh is proposing a new, continuous, high-frequency route along the Hillsborough corridor from the North Carolina State Fairgrounds to downtown Raleigh, portions of which are served by other existing routes. GoRaleigh conducted a Title VI service equity analysis of the proposed new service. Key findings and recommendations are summarized below:

- The Hillsborough Route is a new service added to the system, and thus constitutes a **major service change**.
- Impacts of adding service to the corridor are anticipated to be positive to mobility and accessibility.
- The **new route will serve minority populations at a rate lower than the GoRaleigh system average** (30.2 percent vs 44.9 percent, respectively).
- The **new route will serve low-income populations at a rate higher than the GoRaleigh system average** (25.7 percent vs 20.1 percent, respectively).
- While direct negative impacts to minority populations are not anticipated, **there is potential for a disparate impact to minority populations who may have lower relative opportunity to benefit from the positive changes from introducing new service**.
- **Low-income populations may experience disproportionate positive benefits from the proposed service**; this may reflect the university populations positively benefitting from the new service (North Carolina State University and Meredith College) .
- **GoRaleigh should continue, as the agency has done in the past, to balance service additions throughout diverse neighborhoods and communities across Raleigh** through application of an equitable transit framework and reviews.
- Planned outreach for the proposed service should include specific efforts to engage with minority and low-income populations and incorporate their input into service plans.

1.0 Introduction

GoRaleigh, the City of Raleigh's Department of Transportation Transit Program, is conducting a Service Equity Analysis under Title VI of the Civil Rights Act of 1964 to evaluate a proposed new service for Hillsborough Street in Fiscal Year (FY) 2023. GoRaleigh administers public transportation for the city, including a fixed route transportation system, paratransit service, and a free downtown circulator. The agency currently provides fixed-route service along 41 bus routes, including five connector routes and five express routes. Fixed routes provide service to much of the Raleigh urbanized area; GoRaleigh's service area is shown in **Figure 1: Existing GoRaleigh System and Service Area**. GoRaleigh served approximately 4 million fixed-route passenger trips annually and an additional 10 thousand annual paratransit trips during the previous fiscal year. Ridership was impacted by the COVID-19 pandemic has been steadily increasing back to pre-COVID levels.

1.1 Background and Overview

In 2016, the Wake County Transit Plan was approved by Wake County voters and outlined a broad set of transit investment priorities for all transit agencies in Wake County. Corresponding Annual Work Plans outline details on the proposed services and changes for each agency, which are adopted every fiscal year. GoRaleigh proposes a new route on Hillsborough Street to begin service in Fiscal Year (FY) 2023. The proposed route is a part of the FY 2023 Annual Work Plan for GoRaleigh, and is consistent with the agency's ongoing efforts to enhance transit services and improve efficiency.

This service change supports one of the four "Big Moves" identified in the Wake Transit Plan to provide "Frequent, Reliable Urban Mobility", which entails increasing the size of the frequent transit network, defined as service every 15 minutes or better all day.

GoRaleigh is proposing to implement a new route with frequent service that connects NC State Fairgrounds to downtown Raleigh (see **Figure 1**). The anticipated route schedule will provide weekday, Saturday, and Sunday service as shown in **Table 1**. Due to a NCDOT's Blue Ridge-Hillsborough Street Grade Separation project that will impact the Hillsborough service area, the route package will be implemented in phases to ensure no interruption of the route during the construction of the project (see **Figure 6**). Upon completion of the project in Summer 2023, Route 9 will resume its original designed route path.

This service equity analysis will assess the complete route path.

The map displays the Hillsborough area, including Meredith College and NCSU Central Campus. A red line indicates the proposed Hillsborough route, which starts near Lake Johnson, passes through the center of the area, and ends near Raleigh. A black line shows the current GoRaleigh routes. The map includes a legend, a scale bar (0 to 1.5 miles), and a north arrow. The legend identifies the Raleigh Municipal Boundary, the Proposed Hillsborough Route, and the Current GoRaleigh Routes. The scale bar shows distances of 0, 0.38, 0.75, and 1.5 miles. The north arrow points upwards. The map also shows various creeks and lakes, including Lake Johnson, Lake Raleigh, and several creeks like Hills Creek, Southeast Prong Beaverdam Creek, and Wolf Creek.

Hillsborough

Legend:

- Raleigh Municipal Boundary
- Proposed Hillsborough Route
- Current GoRaleigh Routes

Scale: 0, 0.38, 0.75, 1.5 Miles

North Arrow: N

Map Labels:

- Meredith College
- NCSU Central Campus
- Raleigh
- Lake Johnson
- Lake Raleigh
- Hills Creek
- Southeast Prong Beaverdam Creek
- Wolf Creek
- Walden Branch

Map Data: North Carolina State University, City of Raleigh, Town of Cary, Johnston County, State of North Carolina DOT, Esri, HERE, Garmin, INCREMENT P, USGS, EPA, State of North Carolina DOT, Esri, HERE

Table 1: Proposed Hillsborough Street Service

Route	Service Span	Frequencies
9 Hillsborough	Weekday: 5:30am-12:30am Saturday: 5:30am-12:30am Sunday: 6:30am-11:30pm	Off-Peak: 15-30 minutes Peak: 15 minutes

Source: Wake Bus Plan Short Range Transit Plans

1.2 FTA Recipient Requirements

As a recipient of FTA financial assistance, GoRaleigh must comply with Title VI of the Civil Rights Act of 1964, follow Executive Order 12898 on federal actions to address Environmental Justice, and adhere to the guidelines established in the Federal Transit Administration's Circular 4702.1B. These guidance documents were used to develop GoRaleigh's service equity analysis for the proposed Hillsborough Street service package, and a summary of their directives are as follows:

- Discrimination based on race, color, or national origin is prohibited under any program or activity receiving federal financial assistance. *Title VI of the Civil Rights Act of 1964, as amended*
- Transit agencies receiving federal funds must develop and implement an agency-wide Title VI Program. *Federal Transit Administration (FTA) Circular 4702.1B, October 2012*
- Minority communities and low-income populations must not be subject to disproportionately high and adverse environmental effects. *Executive Order 12898 "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations"*

As a large transit operator providing fixed route service in a large, urbanized area¹, GoRaleigh must evaluate if any adverse effects result from major service changes and address any potential disparate and disproportionate impacts affecting minority and low-income populations.

FTA circular 2702.1B 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 thus transit providers must determine whether low-income populations will bear a disproportionate burden of any proposed major service or fare changes.

Based on other civil rights statutes, equity analyses may also discuss any potential for discrimination based on other characteristics such as age, sex, gender, physical/mental disability, and English language proficiency. GoRaleigh uses a consistent methodology when conducting service equity analyses as described in the following section.

¹ Fixed route transit providers located in urbanized areas with a population of 200,000 or more that operate 50 or more fixed route vehicles in peak hours must evaluate and address potential disparate and disproportionate impacts that major service or fare changes may have on minority and low-income populations, respectively and consider mitigation strategies as needed. Federal Transit Administration (FTA) Circular 4702.B, October 2012.

2.0 Methodology

A service equity analysis was conducted to evaluate if the proposed Hillsborough Street service constitutes a major service change and whether proposed service adversely impacts minority or low-income populations in the area. The steps of a service equity analysis are highlighted to the right and detailed in the following sections. The underlying data analysis methodology is described below. The equity analysis report also documents any alternatives or mitigation needed and summarizes the public engagement used to inform the proposed service and any adjustments.

Service Equity Analysis Steps:

- Determine if proposed change(s) constitute a major service change under the agency's major service change policy. If so, a service equity analysis should be conducted.
- Identify the location of any Title VI or low-income populations within the transit service area.
- Describe the nature and extent of the potential impacts of the proposed service change.
- Determine whether planned service changes will have a *disparate impact* on minority populations based on the agency's current policies and thresholds.
- Determine whether low-income populations will bear a *disproportionate burden* of the changes current policies and thresholds.

Major service change, disparate impact, and disproportionate burden definitions and policies can be found in **Appendix A**.

Data Sources. Data from the US Census American Community Survey (ACS) 5-year annual estimates was collected at the Block Group level for GoRaleigh's existing and proposed service areas. While ACS data is used in the analysis of impacts in this report, demographic information from onboard customer surveys is also reviewed and discussed since historical ridership data reveals differing demographic characteristics compared with ACS data for the agency's service area.

Buffer Analysis. A one-third-mile buffer was applied to current and proposed bus routes using Geographic Information Systems (GIS) technology. Census Block Groups intersecting this buffer were used to calculate the minority and low-income for GoRaleigh's overall service area and the route being analyzed. Block Groups will not correspond perfectly with the buffer area; where only a small portion of the Block Group was covered by the route buffer, these Block Groups were excluded.

Minority Populations:

Minority populations are identified as the following Census categories

- American Indian and Alaska Native
- Asian
- Black or African American
- Hispanic or Latino
- Native Hawaiian or Other Pacific Islander

Low-Income Populations:

Low-income populations have a household income at or below 150 percent of the federal poverty level for a regionally average household size.

- American Indian and Alaska Native
- Asian
- Black or African American
- Hispanic or Latino
- Native Hawaiian or Other Pacific Islander

3.0 Determination of Major Service Change

The addition of the Hillsborough Street package constitutes a major service change for GoRaleigh. Route 9 – Hillsborough Street is a new route and service, and therefore meets one of the identified criteria for a major service change, which includes “the addition of a route” (see Appendix A for GoRaleigh’s major service change definitions).

4.0 Identification of Title VI Populations

Data from the US Census American Community Survey (ACS) 5-year annual estimates was collected at the Block Group level for GoRaleigh’s existing service area and for the service area of the proposed route to identify minority, low-income, and reference total populations.

Table 2 provides information on the total population, minority population, and low-income population of the City of Raleigh for informational purposes. The percent of the minority and low-income population within Raleigh’s municipal limits is similar to the percent population for the GoRaleigh service area (see **Table 3**). The percent minority population of the service area is 44.9 percent, versus 46.9 percent in the City of Raleigh; the percent low-income population of the service area is 20.1 percent, versus 20.5 percent in the City of Raleigh.

Table 2 - Raleigh Municipal Population

Total Population	Minority Population		Low-income Population*	
	#	%	#	%
464,485	217,782	46.9%	91,178	20.5%
Sources: US Census Bureau, American Community Survey 5-year Estimates (2015-2019), Table B03002, "Hispanic or Latino Origin by Race." and Table C17002, "Ratio of Income to Poverty Level in the Past 12 Months."				
*Census population for low-income individuals excludes institutionalized people, people in military quarters, people in college dormitories, and unrelated individuals under 15 years old				

Table 3 - GoRaleigh Existing Service Area

Total Service Population	Minority Population		Low-income Population*	
	#	%	#	%
557,391	250,129	44.9%	108,078	20.1%
Sources: US Census Bureau, American Community Survey 5-year Estimates (2015-2019), Table B03002, "Hispanic or Latino Origin by Race." and Table C17002, "Ratio of Income to Poverty Level in the Past 12 Months."				
*Census population for low-income individuals excludes institutionalized people, people in military quarters, people in college dormitories, and unrelated individuals under 15 years old				

While ACS data is used in the analysis of impacts in this report, it should be noted that demographic information from the 2019 GoRaleigh Onboard Customer Survey shows a considerably higher proportion of GoRaleigh riders (approximately 78 percent) were minority. This survey also shows that approximately 50 percent of GoRaleigh riders in 2019 had annual household income of \$25,000 or lower. This information shows the significance of bus service in the GoRaleigh service area to minority and transit dependent populations and should be considered when proposing route changes or new service along with the required analysis based on Census data.

Figures 2 and 3 on the following page show the distribution, or percent minority and low-income populations by Census block group, in the service area for existing routes, which is used as the basis for Title VI analysis. The service area includes a one-third mile buffer around all existing GoRaleigh bus routes. **Figures 4 and 5** show the percent minority and low-income populations by Census block group on the proposed Hillsborough Street route based on the third-mile buffer.

Figure 2: GoRaleigh Existing Service Area, Minority Populations

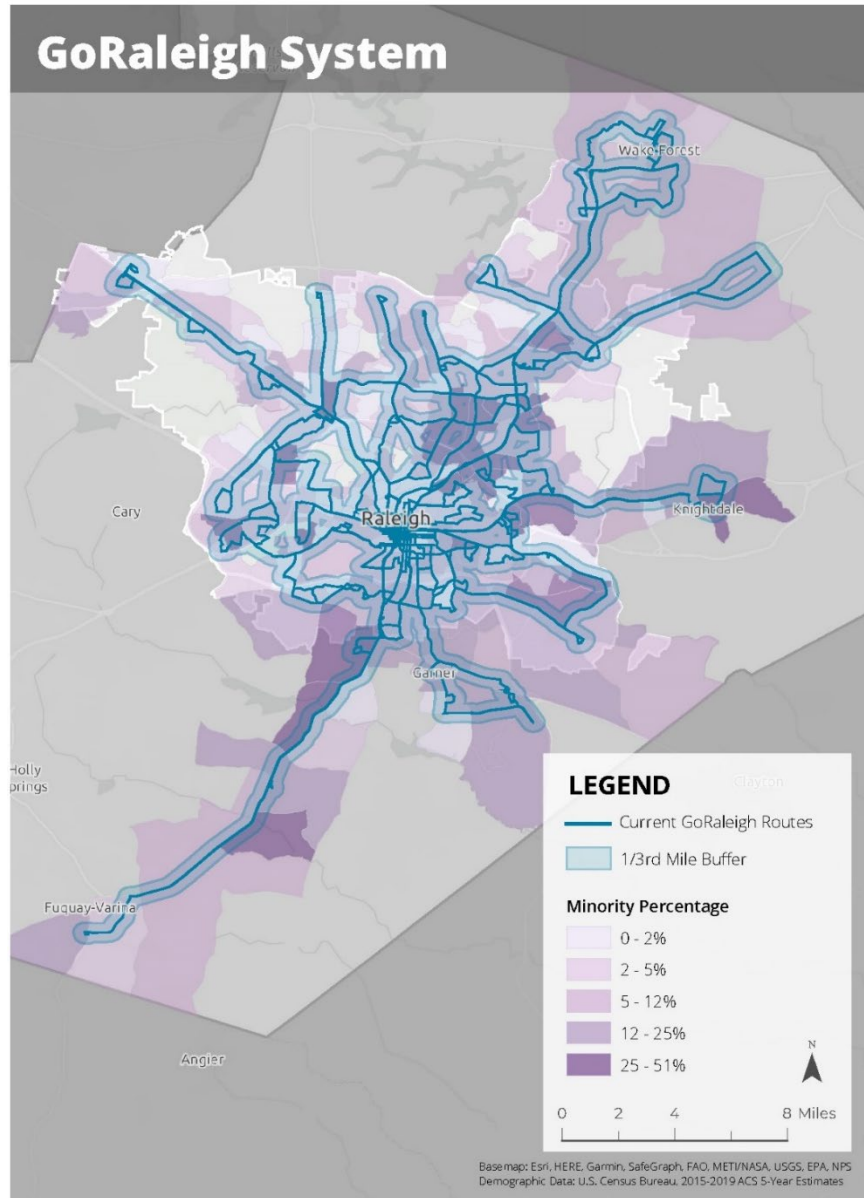


Figure 3: GoRaleigh Existing System Service Area, Low-Income Population

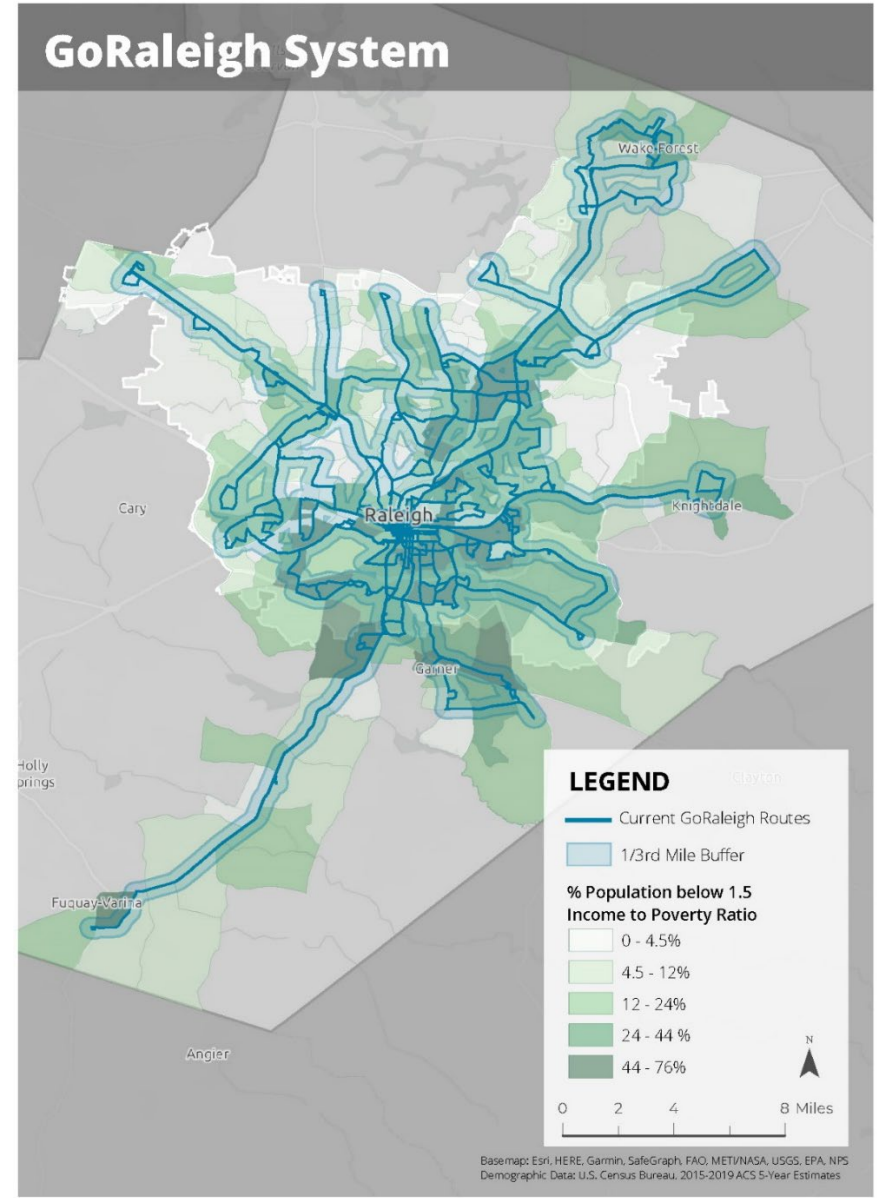


Figure 4: Minority Population along Hillsborough Route and Service Area

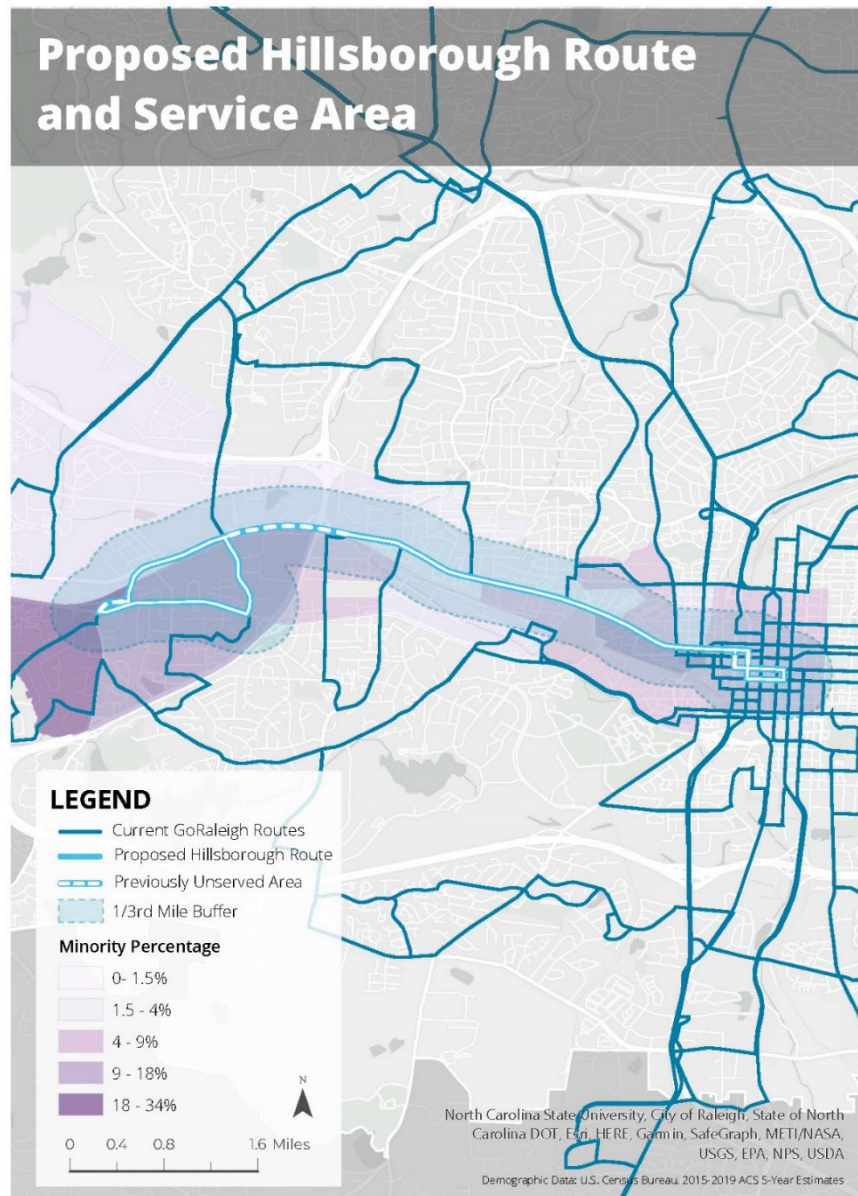
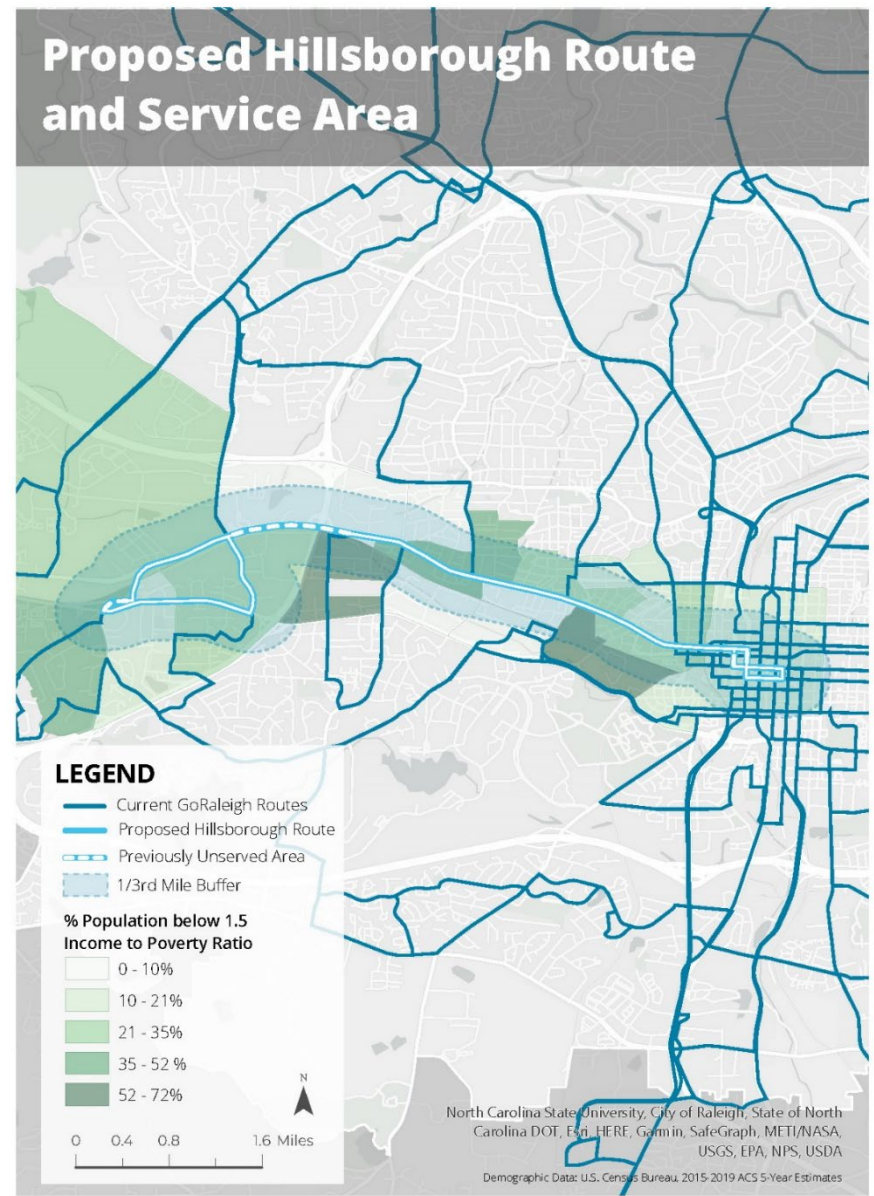


Figure 5: Low-Income Population along Hillsborough Route and Service Area



5.0 Evaluation of Major Service Change Impacts

5.1 Service Impacts

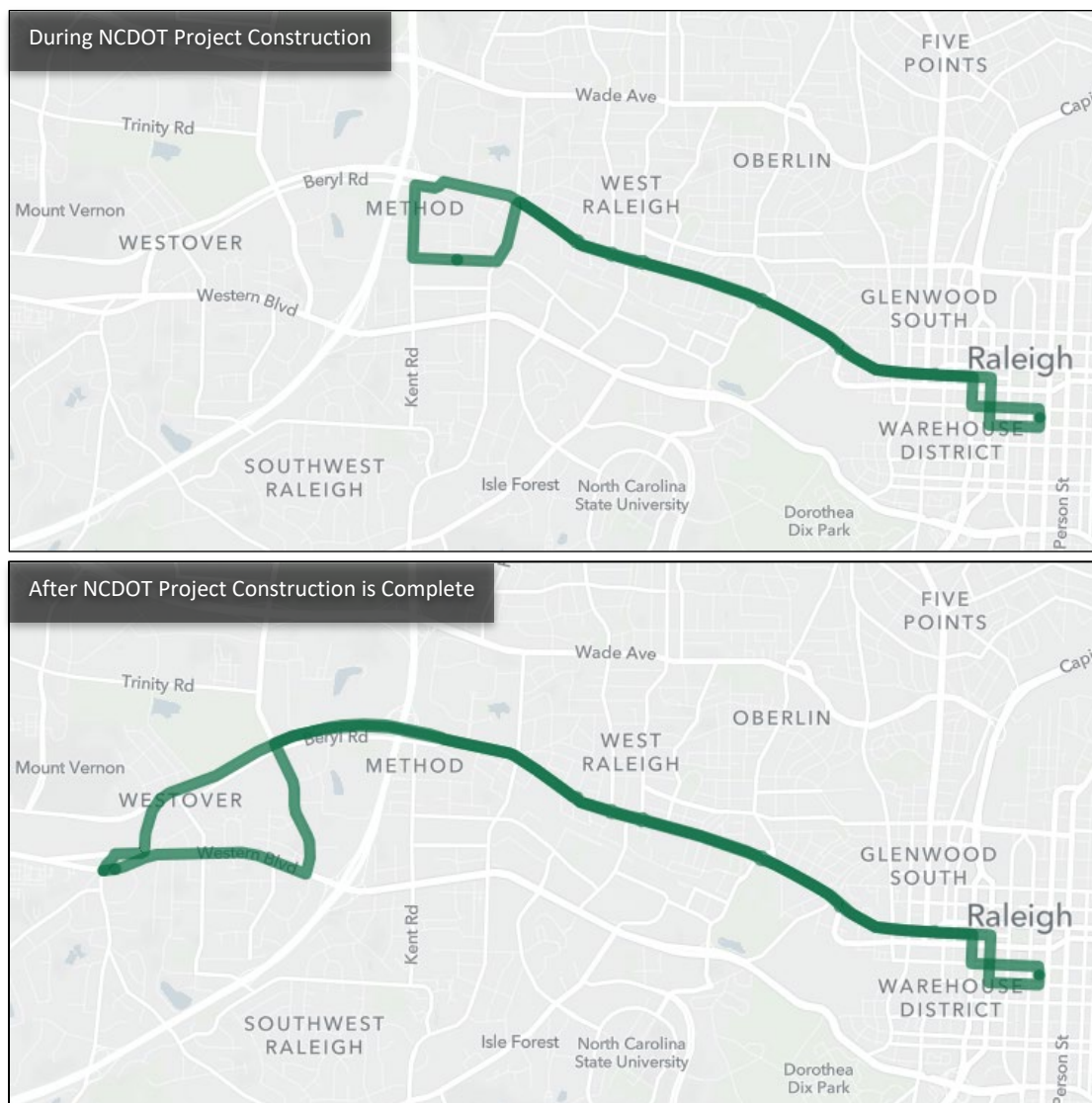
The proposed route change being evaluated for service equity impacts is the implementation of a new bus route connecting various commercial, institutional, and other destinations.

According to the Wake Transit Plan supporting documents, Route 9 – Hillsborough Street will provide frequent service on Hillsborough corridor, between the NC State Fairgrounds and downtown Raleigh. It is not similar to existing service, which currently covers various segments of the corridor with multiple routes”, although existing services run along portions of the proposed route (Route 4 – Rex Hospital, Route 12 – Method, and Route 27 – Blue Ridge). The new route will also cover the portion of Hillsborough Street between Blue Ridge Road and I-440, which is not currently covered by any existing service. The new route connects several key destinations between the fairgrounds and downtown at each end including Meredith College, NCSU and NCSU properties near the fairgrounds.

The new Hillsborough Street route also provides high frequency service – with 15-minute headways throughout the day until 6:00pm, followed by 30-minute headways for the remainder of service, seven days a week – in the downtown core of Raleigh. This supports one of the Wake Transit Plan’s Four Big Moves - “Frequent, Reliable Urban Mobility.”

Due to NCDOT’s Blue Ridge -Hillsborough Street Grade Separation Project (U-4437), the Hillsborough Route path will be implemented in phases. Phase 1 will serve as far as possible along Hillsborough, before returning to the downtown area. After NCDOT’s project is complete during Summer 2023, the project will resume its anticipated route path. The route will continue to have the service span and frequency, as programmed in the Wake Transit Plan. (Refer to Figure 6)

Figure 6: Hillsborough Route, during and after NCDOT Project U-4437



5.2 Title VI Threshold Analysis

The service equity analysis compares the minority and low-income populations within proximity to the new route to the corresponding population data of the overall GoRaleigh service area.

Proposed service changes are determined to have the potential to have a **disparate impact** if the minority population for the affected route(s) differs from GoRaleigh's overall service area by more than 5 percent and either experiences a relatively higher proportion of negative impacts or has a relatively lower opportunity to benefit from positive changes.

Service changes are determined to have a **disproportionate impact** if the low-income population for the affected route(s) differs from GoRaleigh's overall service area by more than 2.5 percent and either experiences a relatively higher proportion of negative impacts or has a relatively lower opportunity to benefit from positive changes. Minority populations are defined using Census categories and low-income populations are based on federal poverty level guidance.

Table 4 summarizes the minority and low-income populations served by the new route. This information is used to determine whether planned service changes will have a disparate impact on minority populations and whether low-income populations will bear a disproportionate burden of the changes. Except for the portion of Hillsborough Street between Blue Ridge Road and I-440, the rest of the Route 9 – Hillsborough Street corridor runs along existing GoRaleigh service. Therefore, it should be noted that the service area population examined in this impact analysis is already reflected in the overall system population.

Table 2- Route Demographics and Threshold Analysis

Route #	Route Name	Description of Changes	Route Status	Total Population	Minority Total	Minority %	Low-income Total	Low-income %
9	Hillsborough Street	New route	Proposed	87,098	26,298	30.2%	16,602	25.7%
Overall GoRaleigh Service Area								
<i>All Existing GoRaleigh Routes (Census Based)</i>				557,391	250,129	44.9%	108,078	20.1%
			Higher percentage than system average, exceeds threshold			Lower percentage than system average, exceeds threshold		

The proposed Hillsborough route would serve minority populations at a rate lower than the system average, by an amount that exceeds the 5 percent difference threshold. The Hillsborough service area has a population that is **30.2 percent minority**, versus the GoRaleigh overall system average of **44.9 percent**. This route would serve low-income populations at a rate higher than the system average, by an amount that exceeds the 2.5 percent difference threshold. The Hillsborough service area has a population that is **25.7 percent low-income**, versus the GoRaleigh overall system average of **20.1 percent**.

The analysis reveals potential for disparate impact to minority populations compared to the system average. The new Hillsborough Street service will serve minority populations at a rate that is 14.7 percent less than GoRaleigh's system average. Stated in a different way, throughout GoRaleigh's service area, minority households consist of 44.9 percent of the total population served; however, in the new Hillsborough Street service area, only 30.2 percent of the households consist of minority populations.

The analysis does not show potential for a disproportionate burden to low-income populations. There is a potential disproportionate positive effect as the potential new service area reflects a low-income population percentage that exceeds the system average by an amount that exceeds the disproportionate burden threshold. However, this finding should take into consideration the prevalence of NC State University and Meredith College students living in the area, which will heavily influence the demographics of surrounding neighborhoods.

University populations are heavily transient, and the demographics tend to shift more frequently than other neighborhoods. University populations also have a high number of students, who tend to have lower incomes, but not face the same challenges as non-student low-income populations. A university route may also provide service to faculty and staff who may live further from campus, outside of the service area, but who will still benefit from the new route.

As previously mentioned, most of the new Hillsborough route covers corridors that are already served by other GoRaleigh routes, plus an additional segment between Blue Ridge Road and I-440. **No negative impacts are anticipated from this new service.**

While the analysis indicates that non-minority populations in the area served by this route are higher than the overall GoRaleigh system average, no service is being removed as part of the Hillsborough package and negative impacts are not anticipated from the proposed action. Minority populations may have lower opportunity to benefit from positive changes and thus, consideration should be given to ensuring that overall service planning includes a balance of proposed services that reflect the system-wide profile of the population that GoRaleigh serves (**see Section 6.0 – Mitigation and Alternatives**). As previously mentioned, the most recent

GoRaleigh customer service survey shows a substantially higher percent minority ridership than indicated by ACS Census data. This highlights the importance of targeted outreach along this and any proposed route, as well as future rider surveys.

6.0 Mitigation and Alternatives

To address the potential disparate impact to minority populations associated with a relatively lower opportunity to benefit from the proposed Hillsborough Street service based on Census data and the Title VI threshold evaluation, GoRaleigh should continue, as the agency has done in the past, to balance service additions throughout diverse neighborhoods and communities across Raleigh. This can include applying an equity framework to future service planning efforts to support equitable provision of fixed route service.

Additionally, planned outreach for this service proposal, should include specific efforts to engage with minority and low-income populations and consider public comment in finalizing plans for the proposed service, and identifying any potential mitigation or alternatives.

7.0 Public Involvement

At this time, public involvement for the Hillsborough route will be included in the FY 2023 Wake County Annual Work Plan effort, anticipated for February 14th to March 16th. The public involvement process will be designed to gather input from the communities impacted by the proposed route investments, to include the proposed new route. Upon completion of the comment period, this section will be updated with additional information from that comment period.

GoRaleigh prepares and updates an inclusive public participation plan to meet FTA Circular 4702.1B Title VI Guidelines. GoRaleigh's most recent Public Participation Plan was prepared in 2021.

8.0 Conclusions

While no direct negative impacts are anticipated from the proposed Hillsborough Street service, the equity analysis has shown potential for a disparate impact to minority populations based on comparison to the system average, as minority populations have a lower relative opportunity to benefit from the proposed Hillsborough Street service. The analysis does not show potential for a disproportionate burden to low-income populations, as the percentage of low-income population in the proposed service area is higher than the GoRaleigh system average. It should be noted that the presence of two college campuses and large student populations will increase the non-working low-income population.

As noted in **Section 6.0 – Mitigation and Alternatives** continued attention is needed by GoRaleigh to ensure that service plans continue to balance demographics and community needs across Raleigh and that further mitigation and alternatives are identified as needed. The public involvement process for this project should emphasize outreach to minority and low-income populations and may reveal additional opportunities or recommendations.

References

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Appendix A: Key Terms and Policies

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. Data for low-income populations was collected from the ACS using table C17002 “Ratio of Income to Poverty Level in the Past 12 Months” (2015-2019 5-year estimates).

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. Minority population was obtained from the ACS 5-year estimates (2015-2019), using table B03002 “Hispanic or Latino Origin by Race.” All populations aside from “White, Non-Hispanic” were determined to be minority populations.

Major Service Change

A “major service change” is defined as any of the following, and shall require a service equity analysis:

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

The following types of activities are not classified as “major service changes” and shall not require a service equity analysis:

- Service for special events;
- Temporary routing changes to address road construction, maintenance or closures; changes or additions to service operated during emergencies; and detours caused by labor strikes, fuels shortages or safety concerns; route number designation changes; the introduction or discontinuation of short or limited-term service (e.g., promotional, demonstration, seasonal or emergency service, or service provided as mitigation or diversions for construction or other similar activities), as long as the service will be/has been operated for no more than 12 months; or
- Any service change that does not meet the conditions of a major service changes as defined above.

Service change proposals that do not meet the criteria for “major” service changes are still subject to an appropriate level of public review and comment. GoRaleigh shall consider the degree of adverse effects and analyze those effects when planning major service changes.

Transit providers that have implemented or will implement a New Start, Small Start, or other new fixed guideway capital project shall conduct a service and fare equity analysis, regardless of whether the project qualifies as a major service change under this policy. Refer to FTA Circular 4702.1B, Chapter IV, page 21, section (c) for more information.

Disparate Impact Policy

The GoRaleigh disparate impact policy establishes a threshold for determining when adverse impacts of major service changes are borne disproportionately by minority populations. GoRaleigh considers impacts to be disparate any time adverse impacts borne by minority populations differ from impacts borne by non-minority populations by **5 percent**. GoRaleigh evaluates the threshold based on the difference in the minority population or ridership on the affected routes compared to the minority populations served by the system overall. When disparate impacts are identified, GoRaleigh will consider modifying the proposed change to avoid, minimize, or mitigate the disparate impacts.

Disproportionate Burden Policy

The GoRaleigh disproportionate burden policy establishes a threshold for determining when adverse impacts of major service changes are borne disproportionately by low-income populations. GoRaleigh considers impacts to be disproportionate when adverse impacts borne by low-income populations differ from impacts borne by non-low-income populations by **2.5 percent**.

GoRaleigh evaluates the threshold based on the difference in the low-income population or ridership on the affected routes compared to the low-income populations served by the system overall. When disproportionate impacts are identified, GoRaleigh will consider modifying the proposed change to avoid, minimize, or mitigate the disproportionate impacts.