



R-Line Suspension Title VI Service Equity Analysis

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Contents

1.0	Introduction	3
1.1	Background and Overview	3
1.2	Methodology.....	4
1.3	Major Service Change Policies and Thresholds.....	5
1.4	Service Area Populations	6
2.0	Major Service Change Impacts.....	6
2.1	Determination of Major Service Changes.....	7
2.2	Evaluation of Impacts.....	7
3.0	Conclusion.....	7
	Appendix A: Maps.....	8

1.0 Introduction

GoRaleigh, the City of Raleigh's Department of Transportation Transit Program, 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 32 bus routes, including five connector routes and three express routes. Fixed routes provide service to much of the Raleigh urbanized area; GoRaleigh's service area is shown in **Figure 1**. GoRaleigh provided 4,779,027 fixed-route passenger trips and an additional 413,871 paratransit trips in Fiscal Year 2020.

GoRaleigh is conducting a Service Equity Analysis under Title VI of the Civil Rights Act of 1964 to evaluate the suspension of Raleigh's free downtown circulator, also known as the "R-Line". This bus service features hybrid electric buses that connects riders to restaurants, retail, entertainment venues, museums, hotels, and parking facilities in downtown Raleigh. The R-Line route and service area is shown in **Figure 2**. The R-Line downtown circulator served approximately 91,443 passengers annually in FY20. In FY21 the route operated from July 2020 to February 2021 and provided 9,381 passenger trips.

1.1 Background and Overview

Due to the COVID-19 pandemic and the resulting decrease in activity in downtown Raleigh the R-Line experienced a 90% decrease in ridership from a typical month in FY20. In response the Raleigh Transit Authority began discussions on the performance in November 2020 and approved a temporary suspension in December 2020. After notification to riders at bus stops and online the R-Line stopped service on February 13th, 2021. Three benchmarks were assigned to trigger a re-start of the service:

- Parking Deck Occupancy rate [Return to 60% of capacity]
- Average Daily Pedestrian Counts [Return to 65% of previous year total]
- Downtown Food and Beverage Sales [Return to 65% of previous year total]

Due to a shortage of bus operators, the R-Line service was not able to be re-started once these benchmarks were attained. As of the publishing of this document the benchmarks continue to be met and the operator shortage continues to limit the re-start of service. Since the suspension has lasted more than 12 months, 15 months at the time of writing, a Title VI service equity analysis is required.

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 in order 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 they may 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. 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. According to Chapter 4, 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 GoRaleigh meets these thresholds, the agency is required to perform a Title VI Service Equity Analysis of any major service change recommendations on minority and low-income populations.

1.2 Methodology

The Remix Title VI Engine was used to collect the necessary population counts and complete the service equity analysis. More information about the methodology followed by Remix can be found at <https://help.remix.com/en/articles/1439215-remix-101-using-the-remix-title-vi-engine>.

The main components of the service equity analysis include:

- Reviewing proposed route changes and determining if they constitute major service changes requiring further analysis (see Section 1.3 Major Service Change Policies and Thresholds)
- Identifying the location of 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.
- Evaluating service changes to determine whether low-income populations will bear a *disproportionate burden* of the changes.

The analysis of impacts to minority and low-income populations is calculated on a per-route basis. Impact comparisons are made using population data around impacted routes compared with the population of the overall GoRaleigh service area. Impacts to minority and low-income populations are determined using agency service change policies and thresholds (see section 1.3). For any impacts identified, proposed service changes are evaluated to determine whether mitigation measures could lessen impacts to minority and low-income populations.

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. 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.

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).

1.3 Major Service Change Policies and Thresholds

As described in section 1.1 Background and Overview, 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; 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 condition of a major service changes as defined above.

Major Service Change Impact Thresholds

In addition to defining major service changes, FTA requires that agencies establish thresholds for evaluating the impacts of proposed major service changes. A disparate impact policy will help determine if proposed service changes will disproportionately impact minority populations while a

disproportionate burden policy will help determine if the adverse effects of service changes are borne disproportionately by low-income populations. For major service changes, a threshold of **5 percent** is used by GoRaleigh to determine disparate impacts and a threshold of **2.5 percent** for determining disproportionate impacts. Both thresholds are evaluated based on the population data from the ACS 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.

1.4 Service Area Populations

The following section describes the minority and low-income populations of the existing R-Line service area. **Figure 2** in the Appendices shows the service area, defined with a one-third mile buffer, for the R-Line used for Title VI analysis. **Table 1** summarizes the population data for the R-Line service.

Table 1 – R-Line Service Area

Total Population	Minority Population	Percent Minority
9,557	3,879	41.3%
	Low-Income Population	Percent Low-Income
	2,012	21.1%
Source: US Census Bureau, American Community Survey 5-year Estimates (2015-2019), Table B03002, "Hispanic or Latino Origin by Race."		
Source: US Census Bureau, American Community Survey 5-year Estimates (2015-2019), Table C17002, "Ratio of Income to Poverty Level in the Past 12 Months."		

Service Area Populations

The proposed service change would impact the City of Raleigh and neighboring municipalities. **Table 2** presents the total minority and low-income populations within one-third mile of GoRaleigh services.

Table 2 – GoRaleigh Service Area

Total Population	Minority Population	Percent Minority
557,391	250,129	44.9%
	Low-Income Population	Percent Low-Income
	108,078	20.1%
Source: US Census Bureau, American Community Survey 5-year Estimates (2013-2017), Table B03002, "Hispanic or Latino Origin by Race."		
Source: US Census Bureau, American Community Survey 5-year Estimates (2013-2017), Table C17002, "Ratio of Income to Poverty Level in the Past 12 Months."		

2.0 Major Service Change Impacts

The proposed change being evaluated for service equity impacts is the suspension of the R-Line for more than 12 months. The following sections analyze these proposed changes against GoRaleigh's established policies and thresholds for Title VI service equity evaluations.

2.1 Determination of Major Service Changes

Section 1.3 outlined the definitions of a major service change. While the suspension of the R-Line was intended to be temporary and done as mitigation during the COVID-19 pandemic, the adopted Plan defines ‘temporary’ as no more than 12 months. This definition of temporary was exceeded on February 14th, 2022, when the R-Line continued to be out of service. The suspension of the R-Line that began on February 13th, 2021, is determined to be a major service change.

2.2 Evaluation of Impacts

Table 3 compares the service area populations of the R-Line to the overall GoRaleigh service area.

Table 3 – Route Demographics and Threshold Analysis

Route Name	Summary of Changes	Route Status	Total Population	Minority Total	Minority %	Low-income Total	Low-income %
R-Line	Suspended for more than 12 months	Suspended	9,557	3,421	35.8	2,012	21.1
Overall GoRaleigh Service Area							
<i>All Existing Routes</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		

This analysis shows that R-Line suspension is not anticipated to generate disparate impacts to minority populations or disproportionate burdens low-income populations. The route served minority populations at a rate lower than the overall GoRaleigh system. Thus, minority populations do not experience a greater adverse effect from the route’s suspension compared to non-minority populations. The route is not considered a “minority route” as defined in the GoRaleigh Title VI Plan. The route serves low-income populations at a higher rate than the overall GoRaleigh system but does not meet the defined threshold of 2.5 percent to be considered a disproportionate burden on low-income populations.

3.0 Conclusion

No disparate impact to minority populations or disproportionate burden was found due to the suspension of the R-Line. The R-Line service will be re-started when sufficient bus operators are available.

Appendix A: Maps

Figure 1: Existing GoRaleigh System and Service Area

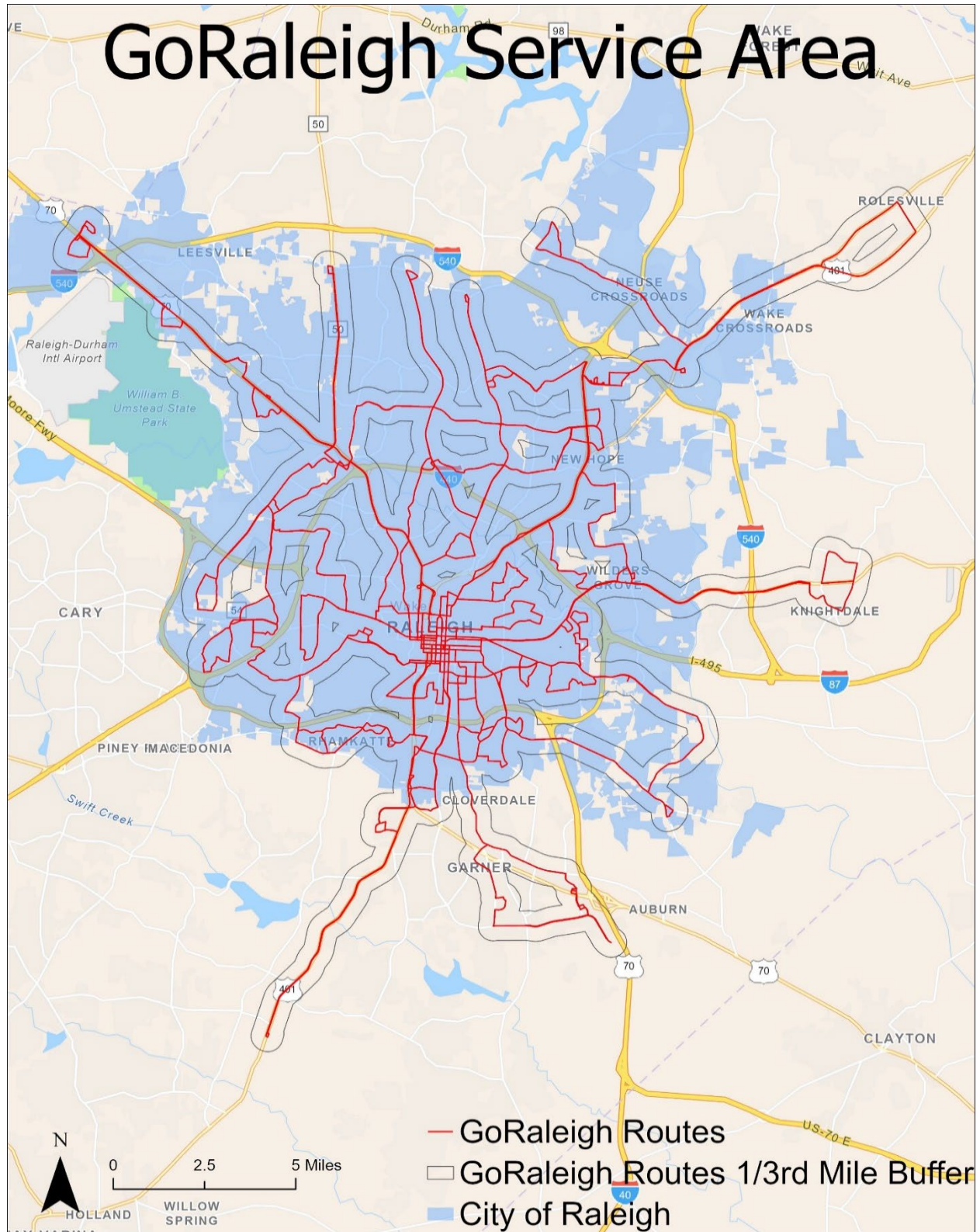


Figure 2: Existing GoRaleigh R-Line Route & Service Area

