

Pierce Transit

# Title VI Service Equity Analysis

Pursuant to FTA Circular 4702.1B

Fife-Milton-Edgewood Demonstration Project

October 2013

# PIERCE TRANSIT TITLE VI SERVICE EQUITY ANALYSIS

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# PIERCE TRANSIT TITLE VI SERVICE EQUITY ANALYSIS

## 1 INTRODUCTION

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. This analysis was conducted in compliance with Federal Transit Administration (FTA) Circular 4702.1B, which requires any FTA recipient serving a population of 200,000 or greater to evaluate any fare change and any major service change at the planning and programming stages to determine whether those changes have a discriminatory impact. This document is an analysis of Pierce Transit's planned February 2014 service reductions and new service associated with the Fife-Milton-Edgewood Demonstration Project.

## 2 BACKGROUND

The proposed Fife-Milton-Edgewood Demonstration Project was established in response to Pierce Transit's Board of Commissioners' Strategic Direction that includes developing innovative services tailored to community needs. The communities of Fife, Milton, and Edgewood have asked for a more tailored service that circulates through their communities providing local transportation options. The proposed concepts are integrated with Routes 402, 500, and 501 to provide stronger local connections while maintaining regional access. The concepts provide a direct connection during commute times to regional services including Sounder commuter rail at the Puyallup Station.

The demonstration project includes a net addition of approximately 5,000 annual service hours. Part of the project includes elimination of some trips on the Route 501 to avoid duplication of service. This service equity analysis examines the impact of both the eliminated trips and the addition of the new tailored service.

## 2.1 Fife-Milton-Edgewood Demonstration Service

The proposed Fife-Milton-Edgewood Community Connector is the result of the work of a Community Investment Team (CIT) who, in partnership with Pierce Transit, developed two route concepts focused on improving fixed route services within the Fife, Milton and Edgewood Communities. The CIT is made up of representatives from the Cities of Fife, Milton, Edgewood and Puyallup, the Puyallup Tribe, Radiance Home Owners Association, Mountain View Community Center, and Edgewood Fish Food Bank.

The CIT expressed a need for local tailored service and strong connections to regional services at the Puyallup Station. The package of concepts is integrated with Routes 402 and 500 to provide timed connections in Fife along Pacific Highway and Route 402 in Edgewood along the Meridian corridor. The proposed concepts represent two new tailored community circulators utilizing small 25 foot cutaway vehicles. The proposal also recommends service adjustments to the Route 402 to provide select timed connections to Sounder commuter rail operating at the Puyallup Station. The CIT also recommended that select Route 501 trips on weekdays and weekends be eliminated to provide efficiency and avoid duplication of services. The proposed Community Connector concepts and changes to the Routes 402 and 501 are described in detail on the Fife-Milton-Edgewood Community Connector fact sheet that is attached as Appendix A. Appendix B shows the entire Pierce Transit System Map.

The complete proposal is for a one-year demonstration project beginning February 2014, and it includes the following:

1. Add a local tailored Community Connector linking the communities of Milton and Edgewood with Fife.
2. Add a local tailored Community Connector linking Fife to Puyallup Station.
3. Adjust four Route 402 trips to make better connections with Sounder Train service at Puyallup Station
4. Eliminate eighteen Route 501 trips, integrating remaining service with proposed tailored Community Connectors.

The proposed modifications to the existing Route 501 service are considered a major service change under Pierce Transit's Major Service Change Policy and require a Title VI Service Equity Analysis and public outreach. Staff has notified riders and non riders of the proposed demonstration and modifications to Route 501 with rider alerts, web site notice, on board rider survey, a web survey, two community open houses and legal notices for a public hearing. The open houses were held on Wednesday, October 30, at the Fife City Hall and Saturday, November 2, at the Milton/Edgewood Library. A Public Hearing will take place at the Board of Commissioners meeting on November 18. To meet the timeline to implement service with the February 2014 service change, the Board of Commissioners will also be asked to consider approving the demonstration at their November 18 Board Meeting.

The additional Community Connector service in the demonstration does not require a Title VI Equity Analysis unless the service is in place for a year or longer. However, Pierce Transit has completed the equity analysis on the additional service and included it here. Schedule adjustments to the Route 402 do not adjust the route revenue miles or revenue hours by 20% so are not considered a major service change and are not analyzed in this report.

### 3 TITLE VI POLICIES & DEFINITIONS

Pierce Transit's Board of Commissioners adopted three new policies in February 2013 related to Title VI that guide this analysis: Major Service Change Policy; Disparate Impact Policy; and Disproportionate Burden Policy. The requirement for these policies comes from Federal Transit Administration (FTA) Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients" which became effective October 1, 2012. The Circular requires any FTA recipient that operates 50 or more fixed route vehicles in peak service and serving a population of 200,000 persons or greater to evaluate any fare change and any major service change at the planning and programming stages to determine whether those changes have a discriminatory impact.

#### 3.1 PIERCE TRANSIT MAJOR SERVICE CHANGE POLICY

The purpose of this policy is to establish a threshold that defines a major service change and to define an adverse effect caused by a major service change.

A major service change is defined as any change in service on any individual route that would add or eliminate more than twenty percent of the route revenue miles or twenty percent of the route revenue hours. All major service changes will be subject to an equity analysis which includes an analysis of adverse effects on minority and low-income populations.

An adverse effect is defined as a geographical or time-based reduction in service which includes but is not limited to: span of service changes, frequency changes, route segment elimination, re-routing, or route elimination.

#### 3.2 PIERCE TRANSIT DISPARATE IMPACT POLICY

The purpose of this policy is to establish a threshold which identifies when adverse effects of a major service change or any fare change are borne disproportionately by minority populations.

A disparate impact occurs when the minority population<sup>1</sup> adversely affected by a fare or service change is ten percent more than the average minority population of Pierce Transit's service area.

Disparate impacts on routes with either span of service changes and/or frequency changes will be determined by analyzing all routes with such changes together. Disparate impacts on routes with segment elimination, re-routing, or route elimination will be determined on a route by route basis.

If Pierce Transit finds a potential disparate impact, the agency will take steps to avoid, minimize or mitigate impacts and then reanalyze the modified service plan to determine whether the impacts were removed. If Pierce Transit chooses not to alter the proposed changes, the agency may implement the service or

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<sup>1</sup> Minority Population – Persons identifying themselves as a race other than white or of Hispanic origin, self-reported in the U.S. Census.

fare change if there is substantial legitimate justification for the change AND the agency can show that there are no alternatives that would have less of an impact on the minority population and would still accomplish the agency’s legitimate program goals.

### 3.3 PIERCE TRANSIT DISPROPORTIONATE BURDEN POLICY

The purpose of this policy is to establish a threshold which identifies when the adverse effects of a major service change or any fare change are borne disproportionately by low-income<sup>2</sup> populations.

A disproportionate burden occurs when the low-income population adversely affected by a fare or service change is five percent more than the average low-income population of Pierce Transit’s service area.

Disproportionate burden on routes with either span of service changes and/or frequency changes will be determined by analyzing all routes with such changes together. Disproportionate burden on routes with segment elimination, re-routing, or route elimination will be determined on a route by route basis.

If Pierce Transit finds a potential disproportionate burden, the agency will take steps to avoid, minimize or mitigate impacts and then reanalyze the modified service plan to determine whether the impacts were removed. If Pierce Transit chooses not to alter the proposed changes, the agency may implement the service or fare change if there is substantial legitimate justification for the change AND the agency can show that there are no alternatives that would have less of an impact on low-income population and would still accomplish the agency’s legitimate program goals.

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<sup>2</sup> Low-Income Population – Persons reporting as being under the federal household poverty limit as defined by the U.S. Department of Health and Human Services.

## 4 METHODOLOGY

Pierce Transit staff calculated the changes in proposed hours and miles to the Routes 501 and 402 to determine whether the planned changes added or eliminated 20% or more in revenue hours or revenue miles and thus would be considered a Major Service Change and subject to the Title VI Equity Analysis. These calculations are provided in Table 4-1 below.

**TABLE 4-1 Routes 501 and 402: Change in Weekly Hours and Miles**

	Route 501 Hours	Route 501 Miles	Route 402 Miles	Route 402 Hours
Current	64	925	703	51
Proposed	43	605	703	52
% change	-32%	-35%	0%	2%

Route 501 is proposed to be reduced by 32% in revenue hours and 35% in revenue miles. Since this is greater than a 20% reduction in hours and miles, a service equity analysis on these reductions was determined to be necessary. Changes to the Route 402 schedule only result in a 2% increase in revenue hours and no increase in revenue miles so no service equity analysis is necessary for this route.

Pierce Transit staff identified the minority and low-income population living within ¼ mile of Route 501, each of the two new Community Connector routes, and within the entire service area. GIS mapping and 2010 Census data were used at the census block level for minority data. American Community Survey 2007-2011 data by census tract was used for low-income data<sup>3</sup>. A ¼ mile buffer was placed around Route 501 and the Community Connector routes to designate the route access range. The population of each tract or block within or touching that buffer was calculated, then the percentages of minority and low-income populations of those tracts/blocks were calculated.

The equity analysis is provided below in Section 5.

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<sup>3</sup> Pierce Transit's 2010 Customer Survey provides information about our riders' race and income, but does not provide statistically significant data on ridership by route, so Census Data was used to analyze the population along Pierce Transit's routes.

## 5 EFFECTS OF PROPOSED SERVICE CHANGE ON MINORITY AND LOW INCOME POPULATIONS

### 5.1 Impact of Service Changes on Minority and Low Income Populations

Figure 5-1 below shows the Route 501 with its ¼ mile access area shown shaded in grey. Pierce Transit routes appear as green lines. Figure 5-2 on the next page shows the Milton-Edgewood Community Connector in bright green and the Fife to Puyallup Station Community Connector in bright blue. Each route's ¼ mile access area used in the analysis is shaded.

Table 5-1 on the next page shows the results of the analysis, comparing the minority and low income proportion of the population living within ¼ mile of Route 501 and the new community connectors with the minority and low income proportion of the service area as a whole.

Figure 5-1 Route 501 Analysis Map

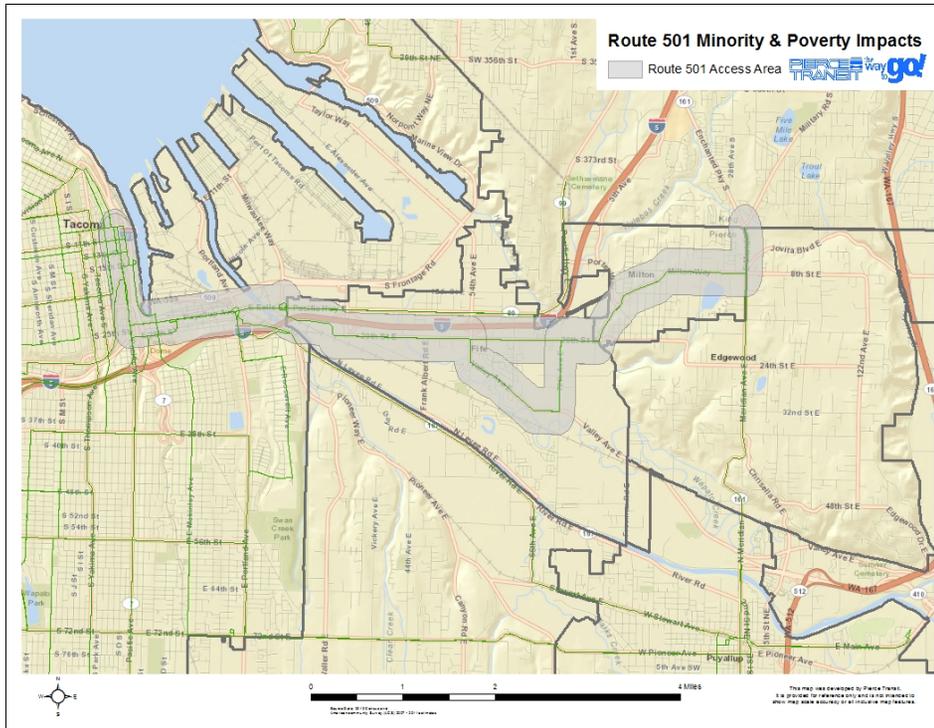


Figure 5-2 New Community Connectors Analysis Map

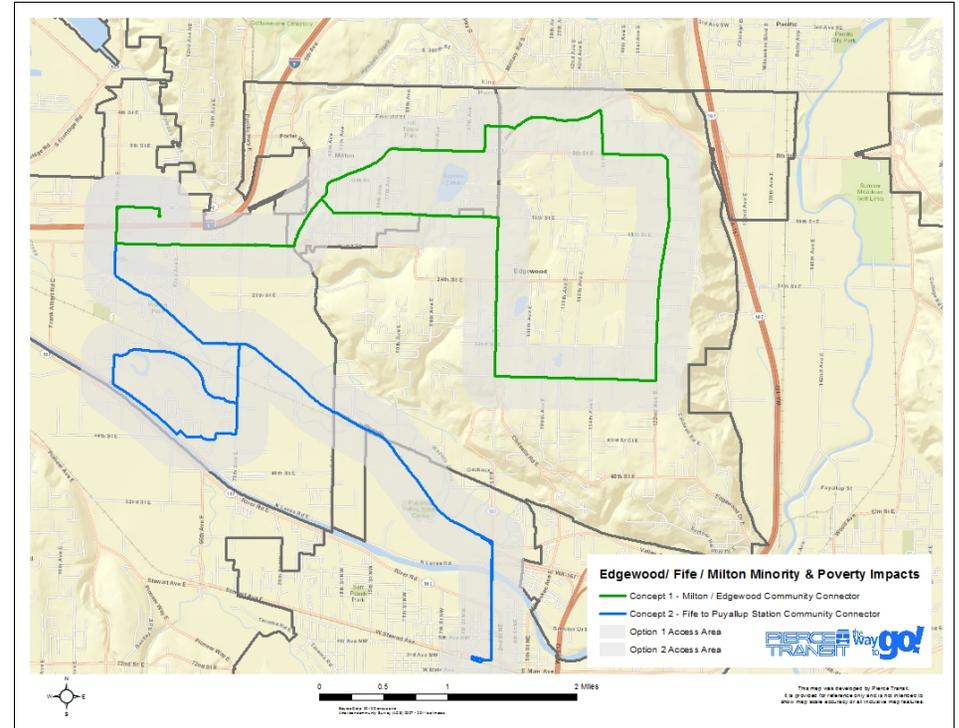


TABLE 5-1 Impact of Service Changes on Minority and Low Income Populations

Summary of Service Change	Minority Proportion of the Population			Low Income Proportion of the Population		
	Census Blocks Along Route	Average Population in Service Area	Difference	Census Blocks Along Route	Average Population in Service Area	Difference
Route 501 – Span of Service, Frequency	47.4%	41.0%	6.4%	13.8%	12.4%	1.4%
Milton-Edgewood Community Connector – New Service	32.2%	41.0%	-8.8%	7.9%	12.4%	-4.5%
Fife to Puyallup Station Community Connector – New Service	49%	41.0%	8%	10.5%	12.4%	-1.9%

## 5.2 Disparate Impact Analysis

Pierce Transit's policy states that a disparate impact occurs when the minority population adversely affected by a fare or service change is 10% more than the average minority population of Pierce Transit's service area.

### *5.2.1 Route 501*

While the minority population along the Route 501 that will experience time-based reductions in service (47.4%) is higher than the service area minority population (41%), this 6.4% difference is not enough to warrant a determination of disparate impact.

### *5.2.2 Milton-Edgewood Community Connector*

The minority population along the Milton-Edgewood Community Connector is 32.2%, which is lower than the service area minority population (41%). This difference of 8.8% is not enough to warrant a determination of disparate impact.

### *5.2.3 Fife-Puyallup Station Community Connector*

The minority population along the Fife-Puyallup Station Community Connector is 49%, which is higher than the service area minority population (41%). This difference of 8% is not enough to warrant a determination of disparate impact.

## 5.3 Disproportionate Burden Analysis

Pierce Transit's policy states that a disproportionate burden occurs when the low-income population adversely affected by a fare or service change is 5% more than the average low-income population of Pierce Transit's service area.

### *5.2.1 Route 501*

The low income population along the Route 501 that will experience reductions in service (13.8%) is slightly higher than the low income population of the service area (12.4%), however, this difference of 1.4% is not enough to warrant a determination of disproportionate burden.

### *5.2.2 Milton-Edgewood Community Connector*

The low income population along the Milton-Edgewood Community Connector is 7.9%, which is lower than the service area low income population (12.4%). This difference of 4.5% is not enough to warrant a determination of disproportionate burden.

### *5.2.3 Fife-Puyallup Station Community Connector*

The low income population along the Fife-Puyallup Station Community Connector is 10.5%, which is slightly lower than the service area low income population (12.4%). This difference of 1.9% is not enough to warrant a determination of disproportionate burden.

## 6 LIST OF APPENDICES

- APPENDIX 1            FIFE-MILTON-EDGEWOOD COMMUNITY CONNECTOR FACT SHEET
- APPENDIX 2            SEPTEMBER 2013 PIERCE TRANSIT SYSTEM MAP



## Fife-Milton-Edgewood Community Connector Innovative Solution

### Background

The proposed Fife-Milton-Edgewood Community Connector is the result of a committed Community Investment Team who, in partnership with Pierce Transit, developed two route concepts focused on improving fixed route services within the Fife, Milton, and Edgewood communities. Proposed service concepts focus on:

- **Community Needs.** Serve key Fife, Milton, and Edgewood community destinations including shopping, medical, libraries, churches, parks, community centers, and post offices.
- **Connections.** Transport Fife, Milton, Edgewood commuters to and from Puyallup Sounder Station during commute times.
- **Integrating tailored service with existing transit system.** Link community connector to Routes 402 and 500 for easy access.

### Community Investment Team

- City of Edgewood
- City of Fife
- City of Milton
- City of Puyallup
- Edgewood F.I.S.H. Food Bank
- Puyallup Tribe of Indians
- Mountain View Community Center
- Radiance Homeowner's Association

### Public feedback sought

We want to hear what the community thinks about the proposed Fife-Milton-Edgewood tailored services.

Contact: Tina Lee | Pierce Transit | Service Innovation Administrator

Phone: 253.589.6887

Email: [tlee@piercetransit.org](mailto:tlee@piercetransit.org)

Mail: Pierce Transit | P.O. Box 99070 | Lakewood, WA 98496-0070

### Timeline

**Wednesday, Oct 30**

**Open House • 4:30 - 7:30 p.m.**

Fife City Hall

5411 23<sup>rd</sup> Street East, Fife

**Saturday, November 2**

**Open House • 11 a.m. – 2 p.m.**

Milton/Edgewood Library

900 Meridian East, Milton

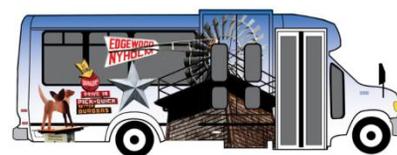
**Monday, November 18**

**Public Hearing • Pierce Transit Board Meeting  
4:00 p.m.**

Pierce Transit Training Center

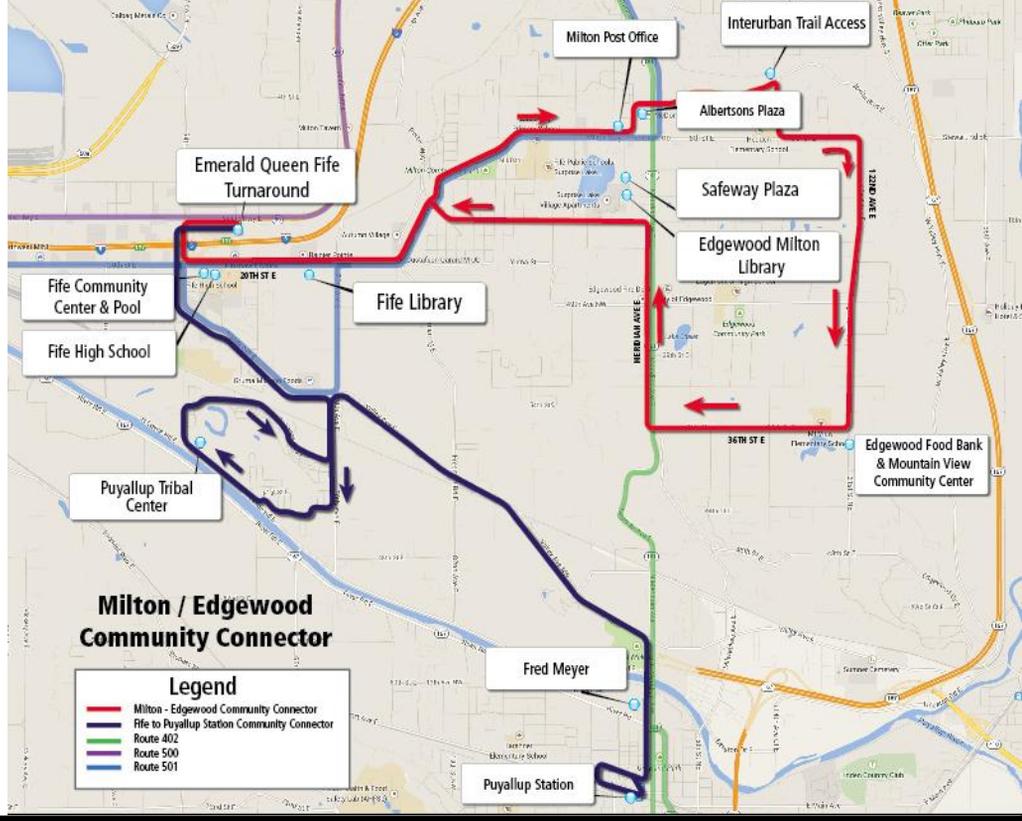
3701 96<sup>th</sup> Street SW

(Meeting at which Board is expected to decide whether to approve tailored service for implementation February 2014 service change.)



# The Proposal

1. Add a local tailored Community Connector linking the communities of Milton and Edgewood with Fife.
2. Add a local tailored Community Connector linking Fife to Puyallup Station.
3. Adjust four Route 402 trips to make better connections with Sounder Train service at Puyallup Station.
4. Eliminate select Route 501 trips, integrating remaining service with proposed tailored Community Connectors.



Proposal	Service Details			
<b>Milton-Edgewood Community Connector</b> <i>Local Tailored Service</i>	<ul style="list-style-type: none"> <li>• Small vehicle – 25 ft.</li> <li>• Service span: Weekdays &amp; weekends                             <ul style="list-style-type: none"> <li>-Thursdays: 10am – 7pm;</li> <li>-All other days: 10am – 2pm</li> </ul> </li> <li>• 60 minute frequency</li> <li>• Integrated with Route 501</li> </ul>			
<b>Fife to Puyallup Station Community Connector</b> <i>Local Tailored Service</i>	<b>Commuter Connection</b> <ul style="list-style-type: none"> <li>• Weekdays: 6 - 8am and 4 - 6:30pm</li> <li>• Trips timed approximately every 30 minutes to meet Sounder between</li> </ul>	<b>Community Connection</b> <ul style="list-style-type: none"> <li>• Weekdays: 9am – 4pm (No weekend service)</li> <li>• 60 minute frequency</li> </ul>		
<b>Route 402 Adjustments</b> <i>Milton/Edgewood to Puyallup Station Connection</i>	<b>Adjusting four Route 402 trips timed to meet Sounder train at Puyallup Station.</b> <table border="0" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> <b>AM adjust first two trip times to start at:</b> <ul style="list-style-type: none"> <li>• 5:20am trip will start at 5:05am Federal Way (FWTC), departs Puyallup Station 5:37am</li> <li>• 6:15am trip will start at 6:12am Federal Way (FWTC), departs Puyallup Station 6:46am</li> </ul> </td> <td style="width: 50%; vertical-align: top;"> <b>PM adjust two trips to meet Sounder Train:</b> <ul style="list-style-type: none"> <li>• 2:37pm trip from 171<sup>st</sup> Meridian, leaves Puyallup Station at 3:56pm</li> <li>• 4:39pm trip from 171<sup>st</sup> Meridian, leaves Puyallup Station at 5:37pm</li> </ul> </td> </tr> </table>		<b>AM adjust first two trip times to start at:</b> <ul style="list-style-type: none"> <li>• 5:20am trip will start at 5:05am Federal Way (FWTC), departs Puyallup Station 5:37am</li> <li>• 6:15am trip will start at 6:12am Federal Way (FWTC), departs Puyallup Station 6:46am</li> </ul>	<b>PM adjust two trips to meet Sounder Train:</b> <ul style="list-style-type: none"> <li>• 2:37pm trip from 171<sup>st</sup> Meridian, leaves Puyallup Station at 3:56pm</li> <li>• 4:39pm trip from 171<sup>st</sup> Meridian, leaves Puyallup Station at 5:37pm</li> </ul>
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<b>Route 501 Adjustments</b> <i>Integrate service with proposed tailored Community Connectors</i>	<p><b>Connections to Federal Way or Tacoma are with a transfer from Milton Community Connector to either Route 500 or Route 402.</b></p> <p><b>Weekday trips proposed for elimination:</b></p> <ul style="list-style-type: none"> <li>• Starting at 10<sup>th</sup> &amp; Commerce traveling to FWTC: 9:58am and 12:01pm</li> <li>• Starting at FWTC traveling to 10<sup>th</sup> &amp; Commerce: 11:16am and 1:16pm</li> </ul> <p><b>Saturday: Eliminate midday service. Other connections are via a transfer to Route 500 or Route 402.</b></p> <ul style="list-style-type: none"> <li>• Saturday trips proposed for elimination starting at 10<sup>th</sup> &amp; Commerce traveling to FWTC: 11:10am, 1:10pm, 3:10am, 5:10pm</li> <li>• Saturday trips proposed for elimination starting at FWTC traveling to 10<sup>th</sup> &amp; Commerce: 10:15am, 12:15pm, 2:15pm, 4:15pm</li> </ul> <p><b>Sunday: Eliminate midday service. Other connections are via a transfer to Route 500 or Route 402.</b></p> <ul style="list-style-type: none"> <li>• Sunday trips proposed for elimination starting at 10<sup>th</sup> &amp; Commerce traveling to FWTC: 11:10am, 1:10pm, 3:10am</li> <li>• Sunday trips that are eliminated starting at FWTC traveling to 10<sup>th</sup> &amp; Commerce: 12:15pm, 2:15pm</li> </ul>			

