

Pierce Transit

# Title VI Service Equity Analysis

Pursuant to FTA Circular 4702.1B

Gig Harbor Trolley Seasonal Service

January 2014

# 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 new seasonal Gig Harbor Trolley service, Route 101, planned to operate from Memorial Day weekend through Labor Day each summer, beginning May 2014.

## 2 BACKGROUND

The proposed Gig Harbor Trolley seasonal service is being established following a demonstration project held during summer 2013. The service was developed in response to Pierce Transit's Board of Commissioners' Strategic Direction that includes developing innovative services tailored to community needs. Trolley service is a tailored transit solution that will aid in Gig Harbor's unique transportation challenges. The Trolley aimed to help reduce congestion in downtown, connect the downtown and uptown districts and renew interest in public transportation. The Gig Harbor Trolley Demonstration Project began July 9, 2013 and concluded on September 28, 2013. The service proved popular with the Gig Harbor community, hitting a total ridership of 28,514 during the 82-day demonstration period. Although the service missed its performance targets in September due to the end of school breaks and summer events, both passengers per service hour and passengers per revenue mile targets were met in July and August. Through an interlocal agreement with the City of Gig Harbor, the city contributed \$41,161 in partnership funds ensuring that the Agency also achieved its farebox recovery target of 16%. The City and the Gig Harbor Community Investment Team (CIT) contributed \$13,673 in marketing and in-kind contributions to support the project.

The addition of the seasonal Trolley service includes a net addition of approximately 2,132 annual service hours. Part of the project includes a seasonal detour of the Route 100 to avoid duplication of service. This service equity analysis examines the impact of both the seasonally eliminated segments and the addition of the new trolley service on minority and low-income populations.

## 2.1 Gig Harbor Trolley Seasonal Service

The proposed Gig Harbor Trolley seasonal service is the result of the work of the Gig Harbor Community Investment Team (CIT), which is comprised of the City of Gig Harbor, Gig Harbor Chamber of Commerce, Merchants of Uptown and the Gig Harbor Downtown Waterfront Alliance, and Pierce Transit (PT). Trolley service has been a goal of the Gig Harbor community for a number of years. The service was popular with the community with total ridership of 28,514 during the 82 day demonstration from July through September, 2013. Pierce Transit plans to operationalize the service and make it a regular seasonal service each year from Memorial Day weekend through Labor Day, beginning in 2014.

An on-board trolley survey, which resulted in 641 completed surveys, was completed during the demonstration period between August 12 and September 8, 2013. The survey results showed a high satisfaction rate for the trolley service, with 94 percent of the respondents reporting that they were satisfied or extremely satisfied with the trolley. There was an overall dissatisfaction rate of 4%, presumably arising from regular Route 100 passengers impacted by the increased trip time and transfer required when the trolley was in operation. When asked if a rider would recommend the trolley to someone else, 91% of survey respondents reported they were very likely or somewhat likely to recommend the trolley. Trip purpose, or the reason why someone was riding the trolley, indicates that 22% of passengers used the trolley to go shopping & errands, 16% for travel to restaurants, and 12% to reach entertainment or recreation. Specific destinations referenced by respondents were the local Farmers' Markets, Downtown, Uptown, Library, and Skate Park.

PT staff has used the information gained during the demonstration period about ridership trends and vehicle type and has continued to coordinate with the CIT to modify some elements of the service profile. These adjustments include changing the duration of the seasonal summer service to a shorter period, operating the service from Memorial Day weekend through Labor Day. Service span adjustments during select days of the week were also based on ridership data.

The Trolley seasonal service brochure provides these details and is attached as Appendix A. Appendix B shows the entire Pierce Transit System Map.

The proposed addition of a new route is considered a major service change under Pierce Transit's Major Service Change Policy and requires a Title VI Service Equity Analysis and public outreach. During the demonstration in 2013, staff collected feedback from riders and non-riders via on-board trolley surveys and a survey sent to Gig Harbor merchants. After considering feedback and demonstration performance, Pierce Transit's Board of Commissioners authorized staff to operationalize the seasonal Trolley service on October 14, 2013. Legal notices were published 20 and 5 days in advance for a Public Hearing on the addition of the Seasonal Trolley Service to take place at the Board of Commissioners meeting on January 13, 2014. The legal notice was also published on Pierce Transit's web site in advance of the public hearing. Outreach about service implementation planned to begin May 24, 2014 will be ongoing and will include information in The Bus Stops Here, Rider Alerts, website notices, and PT staff attendance at various community meetings.

The change to the routing of the Route 100 during the Trolley season does not require a Title VI Service Equity Analysis because the temporary re-routing does not adjust the route revenue miles or revenue hours by 20% so is not considered a major service change. Details on these calculations are provided in Section 4 below.

### 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. In 2012 the poverty limit was \$23,050.

## 4 METHODOLOGY

As a new operationalized route, the Gig Harbor Trolley Seasonal Service, Route 101, automatically qualifies as a Major Service Change and thus is subject to a Title VI Service Equity Analysis. To determine whether the Route 100 seasonal routing modifications qualify as a major service change, Pierce Transit staff calculated the changes in proposed hours and miles to the Route 100 to determine whether the planned changes added or eliminated 20% or more in revenue hours or revenue miles. These calculations are provided in Table 4-1 below.

**TABLE 4-1 Route 100: Change in Daily Hours and Miles**

	Route 100 Hours	Route 100 Miles
Current	20.3	461
Proposed	20.3	431
% change	0%	-6.5%

Route 100 is proposed to be reduced 6.5% in revenue miles with no reduction in revenue hours. Since this is less than a 20% reduction in hours and miles, a service equity analysis on these reductions was determined not to be necessary.

For the Trolley Service, Route 101, Pierce Transit staff identified the minority and low-income population living within ¼ mile of the route, 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 the Trolley route to designate the route access range. The population of each tract or block within or touching that buffer was calculated, and 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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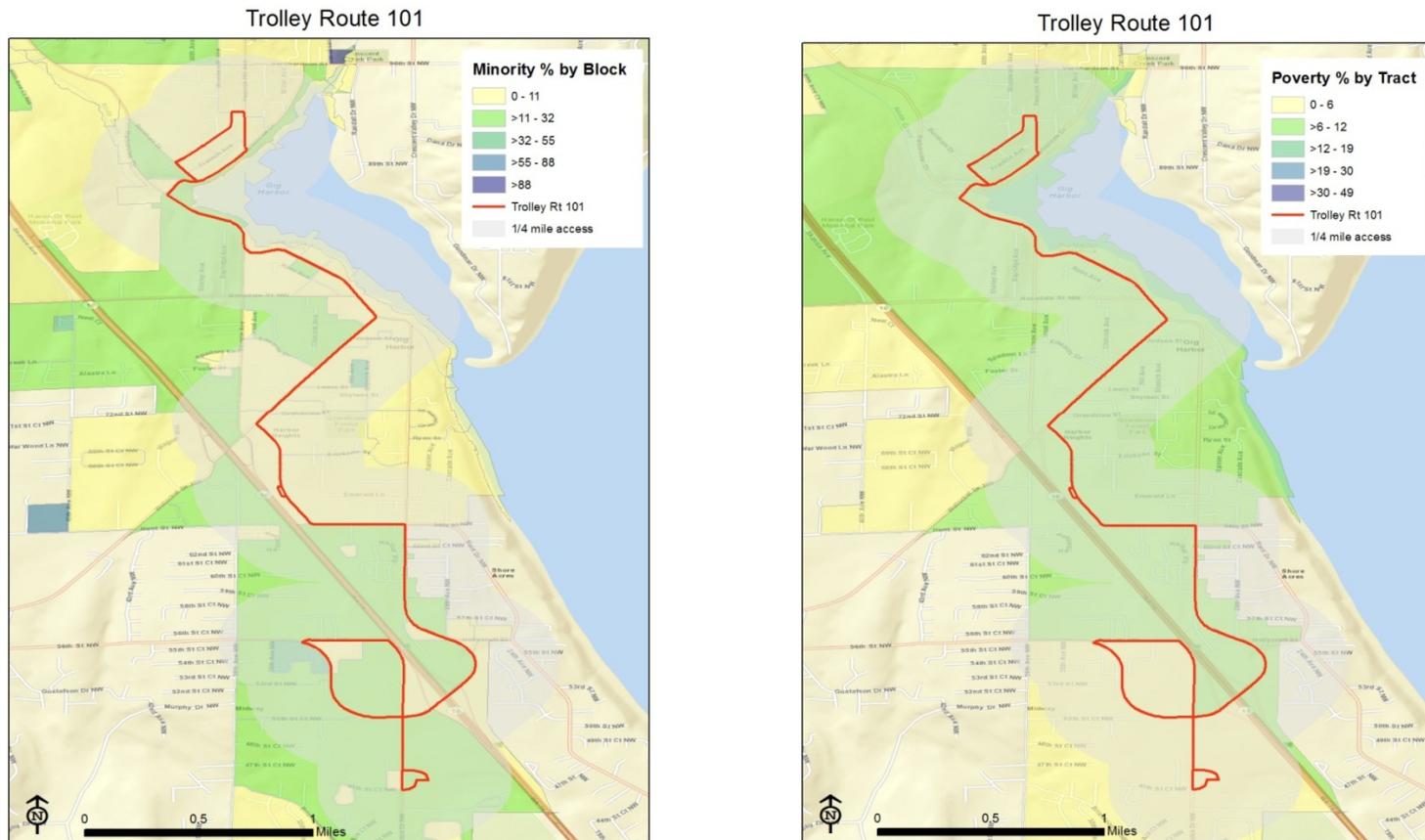
<sup>3</sup> Pierce Transit's 2010 Customer Survey provides information about our riders' race and income, but does not provide statistically significant data on ridership by route, so Census Data was used to analyze the population along Pierce Transit's routes.

## 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 Gig Harbor Trolley Route 101 in red with its ¼ mile access area shown as the clouded area around the route. Table 5-1 below shows the results of the analysis, comparing the minority and low-income proportion of the population living within ¼ mile of Route 101 with the minority and low-income proportion of the service area as a whole.

Figure 5-1 Route 101 Minority and Low-Income Census Blocks/Tracts



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

Summary of Service Change	Minority Proportion of Population			Low-Income Proportion of Population		
	Census Blocks Along Routes	Average Population in Service Area	Difference	Census Tracts Along Routes	Average Population in Service Area	Difference
New Service	17%	41.0%	-24%	6%	12.4%	-6.4%

**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.

At 17%, the minority population along the Route 101 is actually 24% lower than the service area minority population (41%). Since this population is not adversely affected by the additional service, a determination of disparate impact is not warranted. However, since minority populations are not expected to benefit from this seasonal service expansion as much as non-minority populations, FTA requires PT to explain how the agency plans to improve service to minority populations. These plans are in process, with the Fife-Puyallup Station Community Connector planned for implementation in Feb. 2014, which in a recent service equity analysis had a 49% minority population, which is 8% higher than the service area average. In addition, Pierce Transit is successful at providing service to areas with higher minority populations. See Appendix C: PTBA Tracts with Minority and Poverty Populations Greater than the Service Area Threshold. The bulk of Pierce Transit’s existing 38 routes (shown in green in Appendix C) serve the more urban core which contains mainly census tracts with higher than the average minority and low-income populations (shown as the hatched areas in Appendix C, with the higher minority areas shown as yellow/orange/brown).

**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.

The low-income population along the Route 101 is 6%, which is 6.4% lower than the service area low-income population (12.4%). Since this population is not adversely affected by the additional service, a determination of disproportionate burden is not warranted. However, since low-income populations are not expected to benefit from this seasonal service expansion as much as non-low-income populations, FTA requires PT to explain how the agency plans to improve service to low-income populations. These plans are in process, with the Puyallup Tailored Community service currently in the planning phase. This new service is planned for demonstration beginning in June 2014. The map in Appendix C shows a large portion of the Puyallup area in purple, which is a higher than average low-income population. And as mentioned in 5.2 above, Pierce Transit’s system is focused on the urban core which contains a high minority and low-income population (shown as hatched in Appendix C with low-income shown as purple).

## 6 APPENDICES

APPENDIX A	GIG HARBOR TROLLEY INNOVATIVE SOLUTIONS FACT SHEET
APPENDIX B	SEPTEMBER 2013 PIERCE TRANSIT SYSTEM MAP
APPENDIX C	PTBA TRACTS WITH MINORITY AND POVERTY POPULATIONS GREATER THAN THE SERVICE AREA THRESHOLD



# INNOVATIVE PT Trolley 2014 SOLUTIONS



December 19, 2013

## Background

The PT Trolley demonstration in the summer of 2013 provided over 28,000 boardings and connected Gig Harbor's Uptown and Downtown Shopping districts. This demonstration was so successful the Board approved to bring it back. 2014 service will run between Memorial Day weekend and Labor Day weekend.

## Service Details *(Draft with potential changes to Fri, Sat, Sun span)*

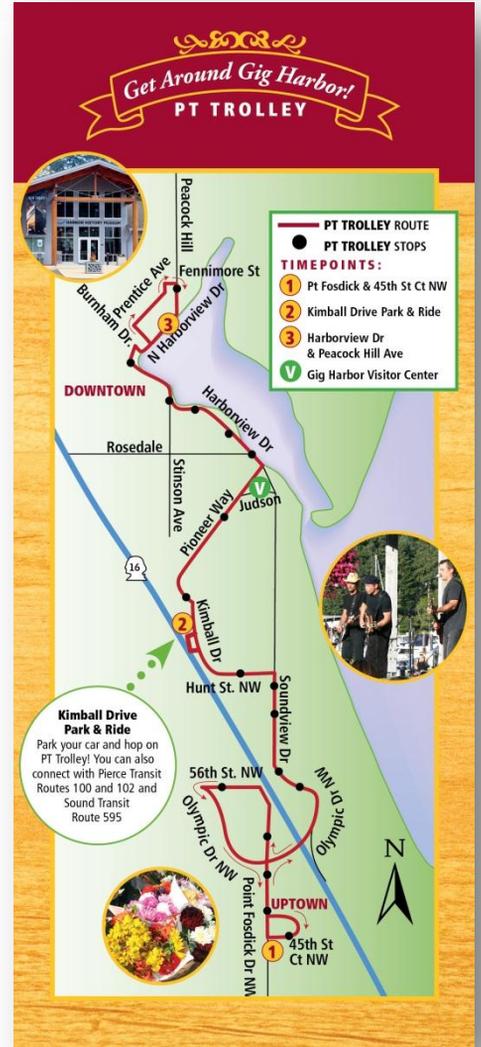
**Saturday, May 24, 2014 – Sunday, August 31, 2014**

Day	Frequency	Span
Monday	30 minute	11 am – 7:30 pm
Tuesday	30 minute	11 am – 9:30 pm
Wednesday	30 minute	11 am – 7:30 pm
Thursday	30 minute	11 am – 7:30 pm
Friday	30 minute	11 am – 10 pm
Saturday	30 minute	11 am – 10 pm
Sunday	30 minute	11 am – 5:30 pm

As a result of community partnership funds pledged by the City of Gig Harbor, fares will be revised from \$2.00 to \$0.50. If adopted, the following fares will be implemented.

Fares	Adult	Youth	*Discounted
One Ride	\$0.50	\$0.50	Free
Monthly Regional Pass	\$18	\$18	---

*\*Must show Regional Reduced Fare Permit*



## Milestones

Dec

Title VI & Fare Equity Analysis

Jan

Public Hearings for Title VI & Fare Equity

Trolley Procurement begins

Marketing Sub group Kicks-off

Feb

Board Adopts Trolley Fare and Title VI

Exec/Finance Committee Authorize Trolley Vehicle Contract

March

Trolleys arrive Vehicle Prep Info for TBSH ready

April

Union Agreement for Trolley Operator Signing Trolley Marketing

May

Routes & Signage Operator Shake-up Service Begins 5/24/13

June

Maritime Parade 6/7/13

## APPENDIX A



# Pierce Transit SYSTEM MAP

**PARK & RIDE:** P

**TRANSIT CENTER:** T

**ROUTE NUMBER:** 410

**PARTICIPATING ORCA RETAILERS:** Sears, Meeker, Qrc

# PTBA Tracts with Minority and Poverty Populations Greater than the Service Area Threshold

 Tracts above the PTBA threshold for both Poverty and Minority

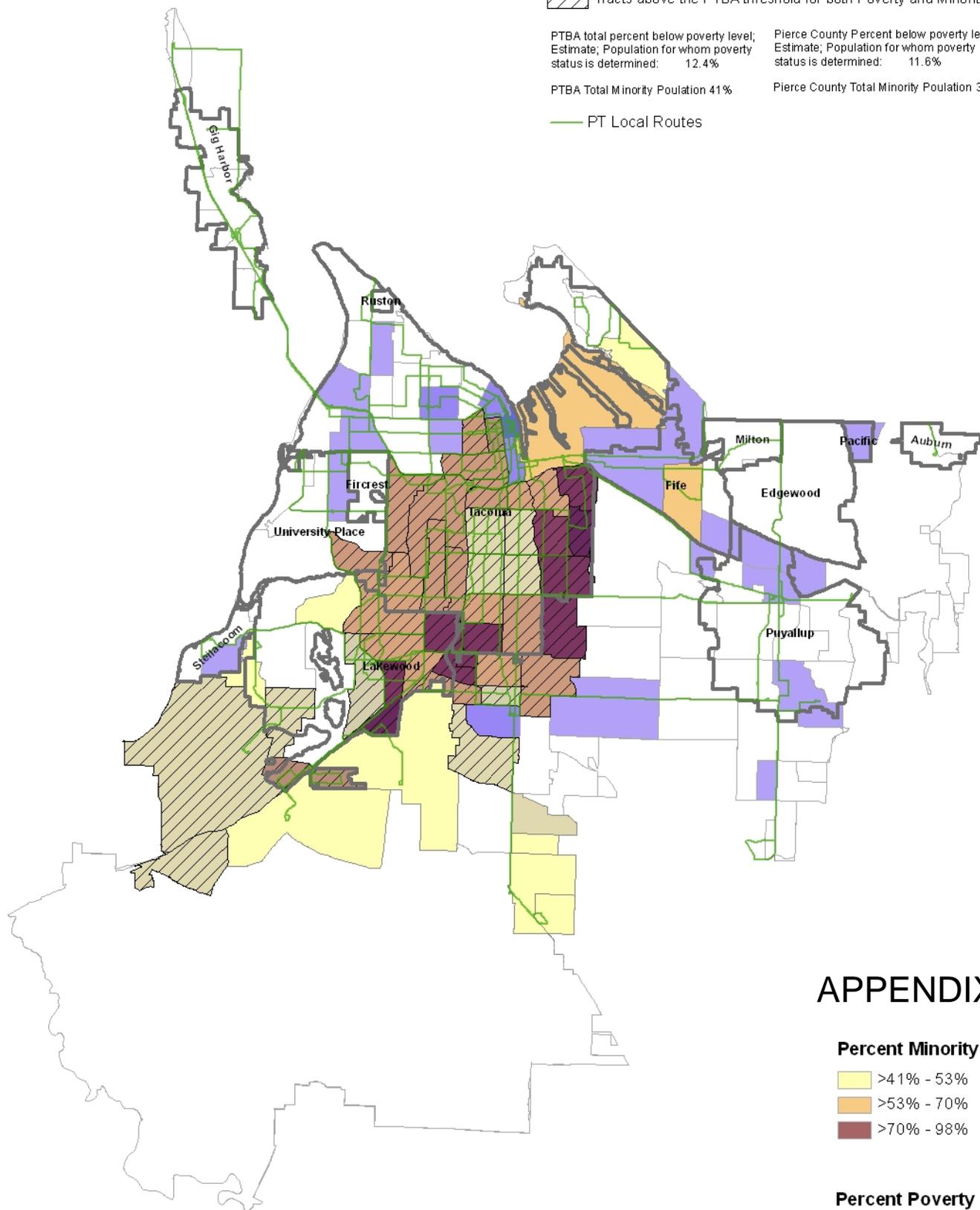
PTBA total percent below poverty level; Estimate; Population for whom poverty status is determined: 12.4%

Pierce County Percent below poverty level; Estimate; Population for whom poverty status is determined: 11.6%

PTBA Total Minority Population 41%

Pierce County Total Minority Population 35%

 PT Local Routes



## APPENDIX C

### Percent Minority

-  >41% - 53%
-  >53% - 70%
-  >70% - 98%

### Percent Poverty

-  12% - 19%
-  >19% - 30%
-  >30% - 50%



0 1.5 3 6 Miles

Source Data: 2010 Census and American Community Survey (ACS) 2007 - 2011 estimates

This map was developed by Pierce Transit. It is provided for reference only and is not intended to show map scale accuracy or all inclusive map features.