

Pierce Transit

Title VI Service Equity Analysis

Pursuant to FTA Circular 4702.1B

Gig Harbor Seasonal Service

March 2025

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 a Title VI analysis of changes to Route 101 seasonal service in Gig Harbor.

2 BACKGROUND

- In 2013 Pierce Transit operated a successful demonstration service of the Gig Harbor Trolley (Figure 2-1).
- In 2014 Pierce Transit began operating the seasonal Gig Harbor Trolley service as Route 101. The service typically ran from late May/early June through Labor Day between Uptown and Downtown.
- In 2015 the route was expanded with an out-and-back leg along Peacock Hill Avenue with a turnaround at Borgen Boulevard and an additional one-way loop via Olympic Drive (Figure 2-1).
- In 2018 the route was modified to loop north along Burnham Drive, east along Borgen Boulevard, and then back south to the Waterfront along Peacock Hill Avenue (Figure 2-1).
- In 2020 the seasonal Gig Harbor Trolley service was paused due to the Covid-19 pandemic.
- In 2021 seasonal service resumed but experienced reduced ridership, which continued to trend downward the following years. Operator shortages necessitated reduced operating hours and frequency of the service.
- In 2024, seasonal service operated on Thursdays and Saturdays. The trolley vehicles were taken out of service after the 2024 season due to maintenance concerns. New trolley vehicles are not available for the 2025 season.
- In 2024 and 2025, Pierce Transit met with representatives from City of Gig Harbor, Gig Harbor Chamber of Commerce, and Waterfront Farmers Market (stakeholders) and discussed potential options given the decreased ridership, vehicle and service limitations, and other barriers to ridership. Pierce Transit initially identified that service could operate at a 1-hour frequency with the 2018-2024 route configuration.
- These stakeholders recommended increased service frequency and identified desired key destinations along the route.

2.1 Action

- Based on stakeholders' recommendations for increased frequency and key destinations, Pierce Transit intends to remove the northern segment from the route for the 2025 summer service (Figure 2-2). This route is substantially similar to the original 2014 route.
- Pierce Transit will apply the travel time savings from the reduced service miles to operate Route 101 at a 30-minute frequency.
- Because the resulting service will reduce the miles of Route 101 by 28%, a Title VI Major Service Change analysis is required.
- Passengers riding from stops along Peacock Hill and Borgen Boulevard will still be able to ride Route 100 and Gig Harbor Runner to connect with local destinations (Figure 2-3).

Figure 2-1 Route 101 Previous Configurations

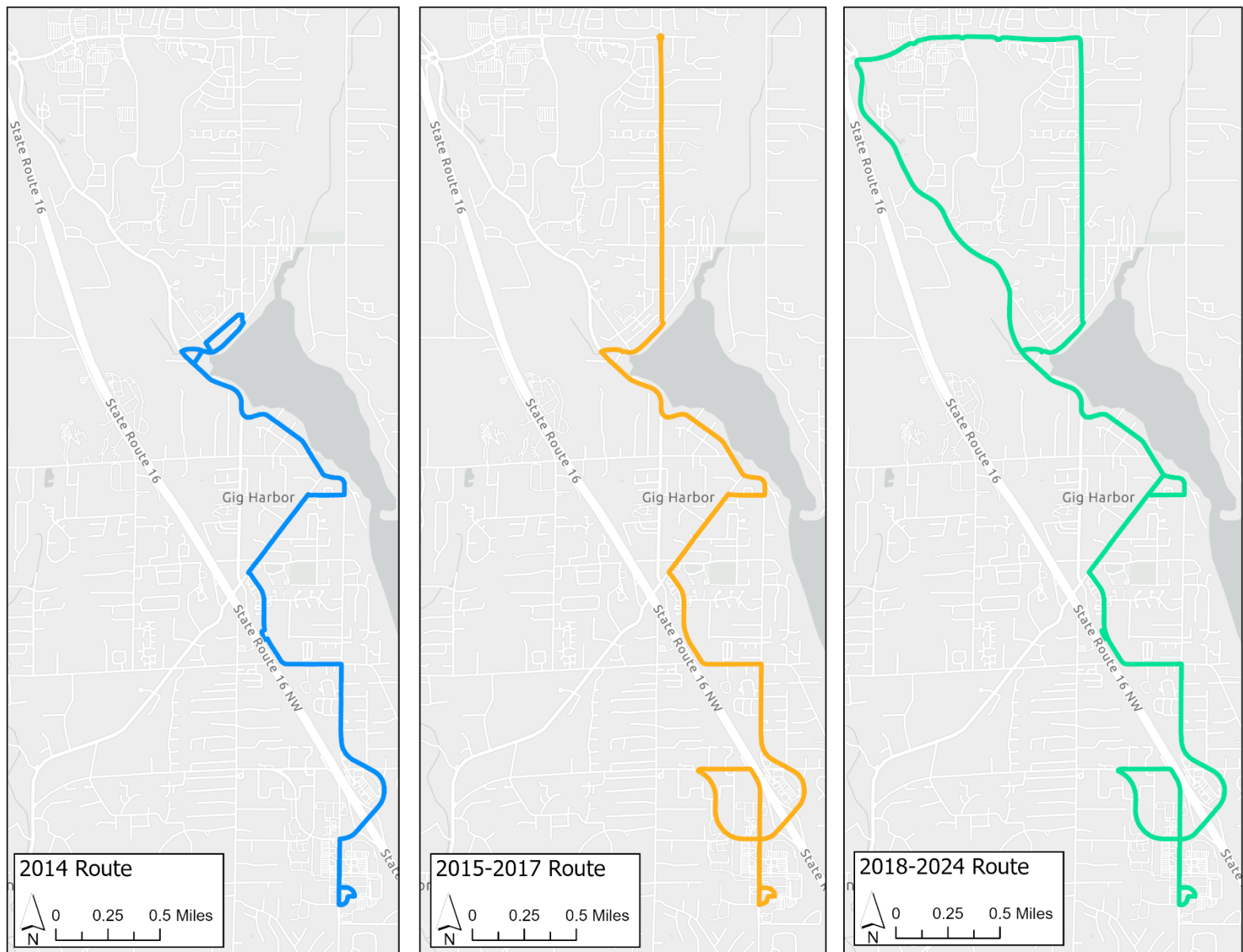


Figure 2-2: Proposed Route 101

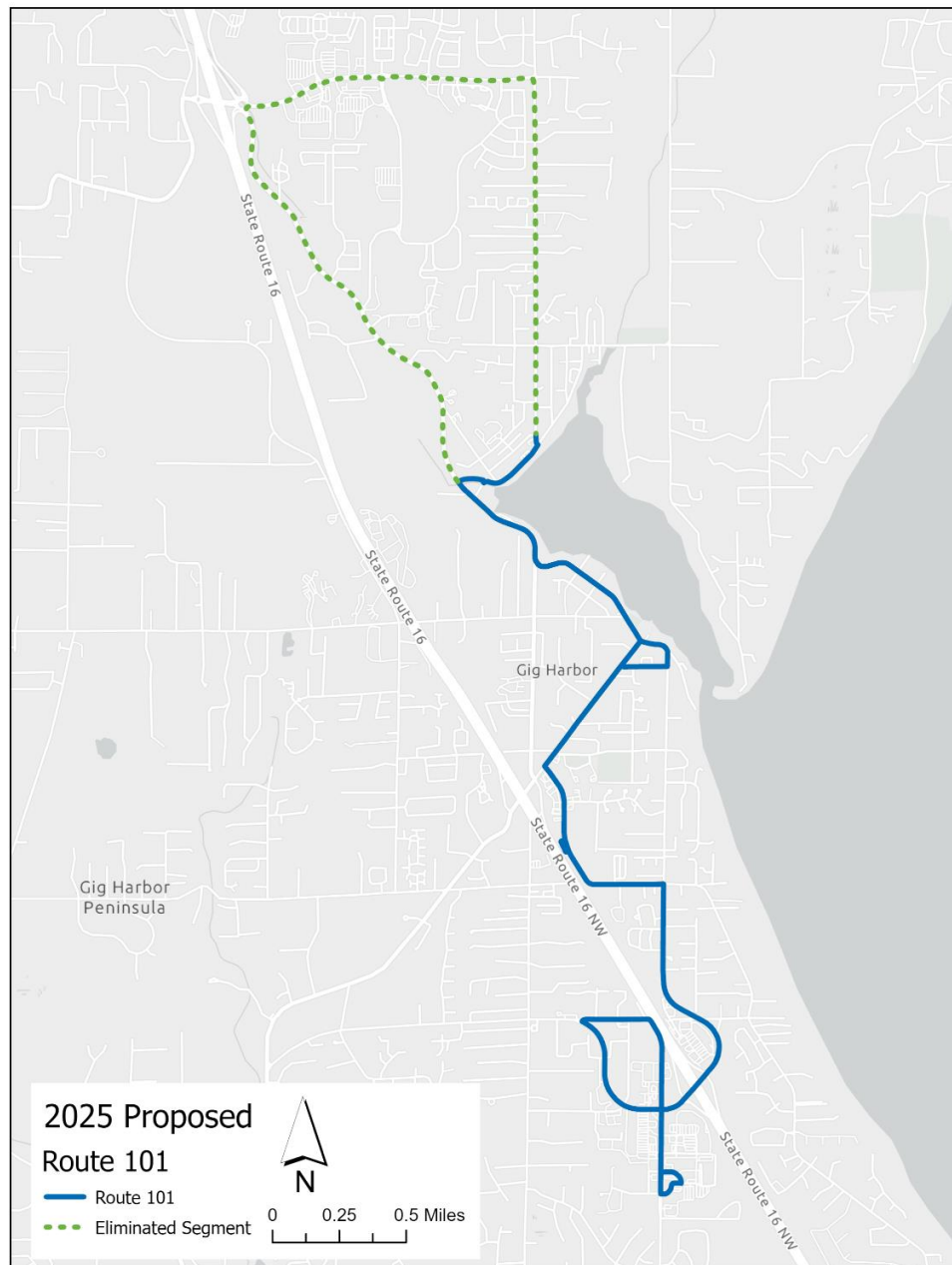
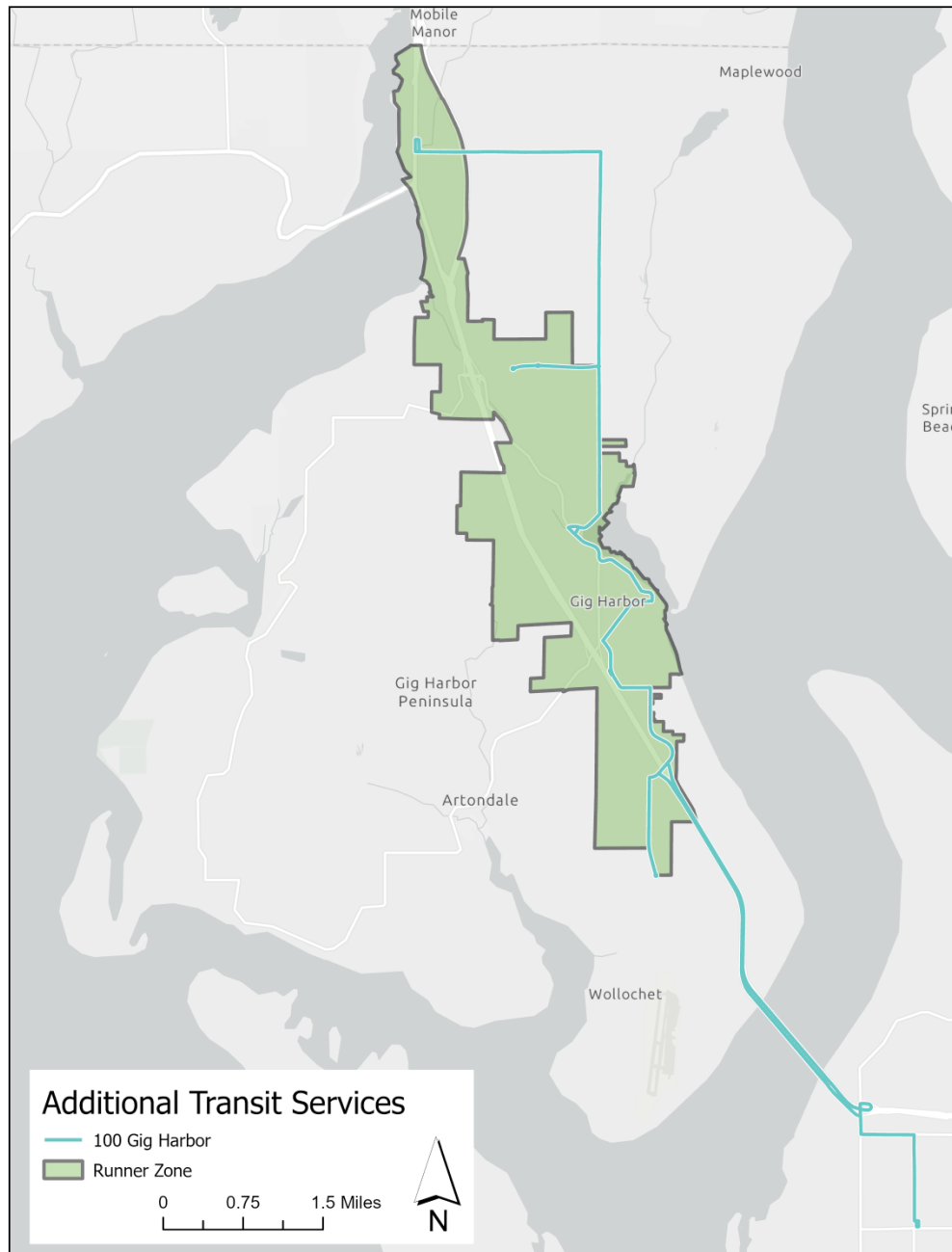


Figure 2-3: Additional Transit Services in Gig Harbor Area



2.2 Outreach and Decision-making

The proposed elimination of a more than 20% of Route 101 is considered a major service change under Pierce Transit's Major Service Change Policy. Therefore, a Title VI Service Equity Analysis and public outreach is required.

Pierce Transit's Board of Commissioners will hold a public hearing on the new Gig Harbor seasonal service configuration at their meeting on April 14, 2025 to gather input from the public. Legal notices will be published on April 3, 2025, 10 days in advance of the public hearing, in the Tacoma News Tribune, and the Tacoma Daily Index, as well as on Pierce Transit's website. Rider alerts notifying the public about the hearing and seeking public comment will be displayed on Pierce Transit's website, posted on social media, and sent to our text message subscribers. The Board will consider implementing the new Gig Harbor seasonal service configuration at its meeting on May 12, 2025.

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 population¹ 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

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

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 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-income² 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.

² **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

The elimination of the northern segment of Route 101 reduces the route miles by 27.6% and qualifies as a Major Service Change subject to a Title VI Service Equity Analysis.

	Route Miles (daily)
Existing 2024	13.7
Proposed 2025	9.9
Percent Change	-28%

To determine whether the proposed route segment elimination constitutes a disparate impact or disproportionate burden, Pierce Transit staff used ArcGIS and 2022 Census data at the census block group level to identify the minority and low-income population living within ¼ mile of the 2024 route and the proposed 2025 route. The following process was used:

1. Get the population near a route, including its low income and minority percentage.
 - For each route scenario, build a shape (buffer) that represents the area within quarter mile of any of its stops.
 - Intersect the buffer area with 2022 Census data. Get a list of block groups and the percentage overlap with each.
 - For each block group, take the percentage of overlap and multiply it by the block group's statistics to obtain the population, minority population, and low-income population for each block group.
 - Add the population, minority population, and low-income population from each block group to obtain the total affected population for each route scenario.
2. Calculate the change in low-income and minority populations served.
 - For each scenario, divide the total low-income population by the total population to get the percentage of change borne by those with low incomes.
 - For each scenario, divide the total minority population by the total population to get the percentage of change borne by minorities.
 - Compare scenarios by subtracting percentages of existing (2024) low-income and minority population served from proposed (2025) low-income and minority population served.
3. Compare the percentage change to the average in the service area.
 - Calculate the average percentage of low-income and minority populations across the entire service area.
 - Subtract from the change borne by those populations from the service area averages to obtain the difference between the impact this set of transit changes and average population.

The equity analysis is provided below in Section 5.

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

5.1 Impact of Service Change on Low-Income and Minority Populations

Table 5-1 describes the existing population served and proposed changes following elimination of the northern segment of Route 101. As shown on Table 5-1, the existing Route 101’s quarter-mile stop transit shed includes 6.9% low-income population and 16.3% minority population. The proposed Route 101’s quarter-mile transit shed includes 8.0% low-income population and 14.0% minority population. Figures 5-1 and 5-2 below provide maps of the routes and show areas with low-income and minority populations relative to service area averages. A quarter-mile buffer is included for the proposed route.

Table 5-1: Analysis of Service Change on Low-Income and Minority Populations

	Percent Households Below Poverty Level	Percent Minority Population
Existing Route 101 (2024)	6.9%	16.3%
Proposed Route 101 (2025)	8.0%	14.0%
Difference	1.1%	-2.3%
System Average	9.3%	41.3%

Figure 5-1

Household Poverty relative to System Average - Route 101

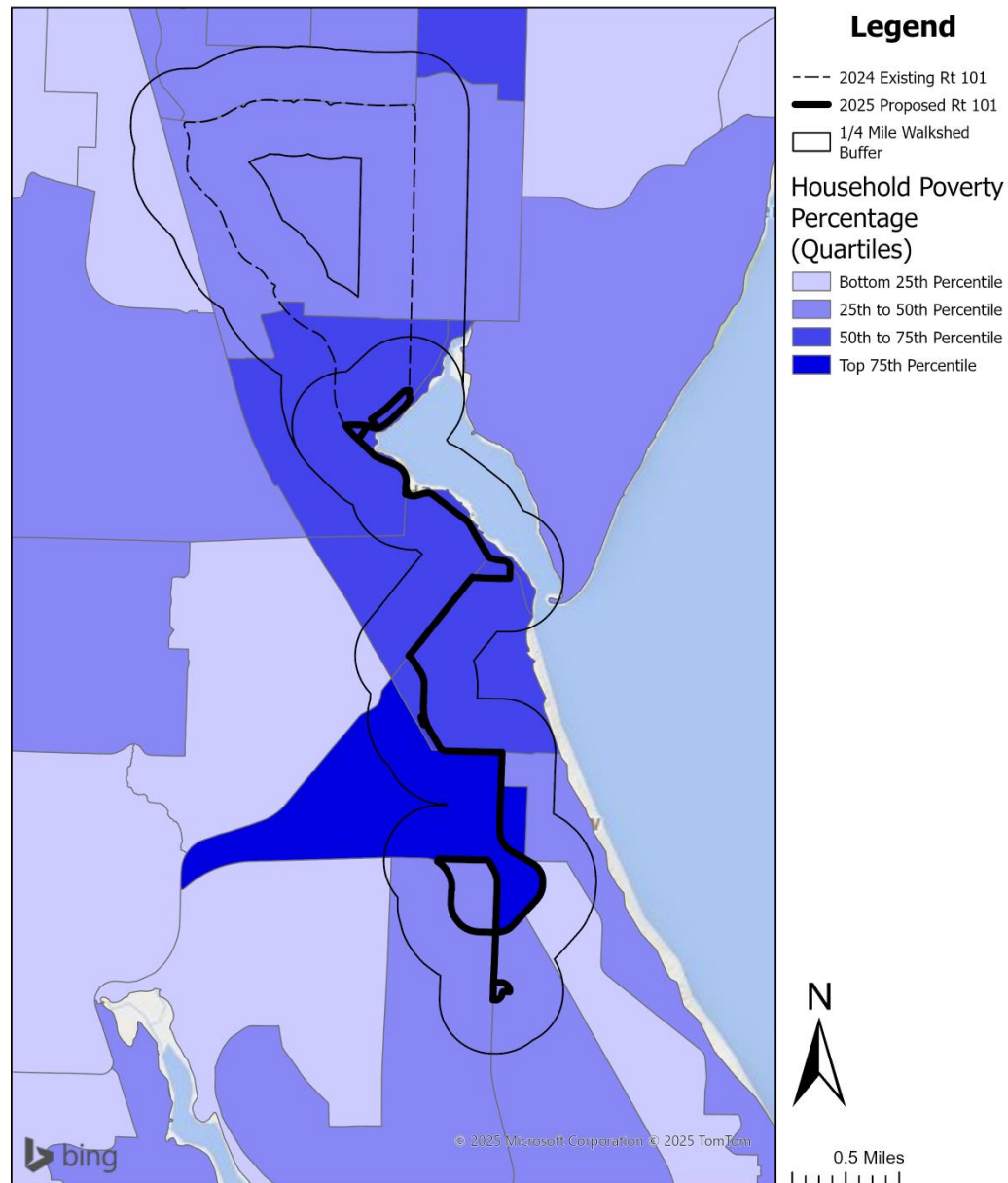
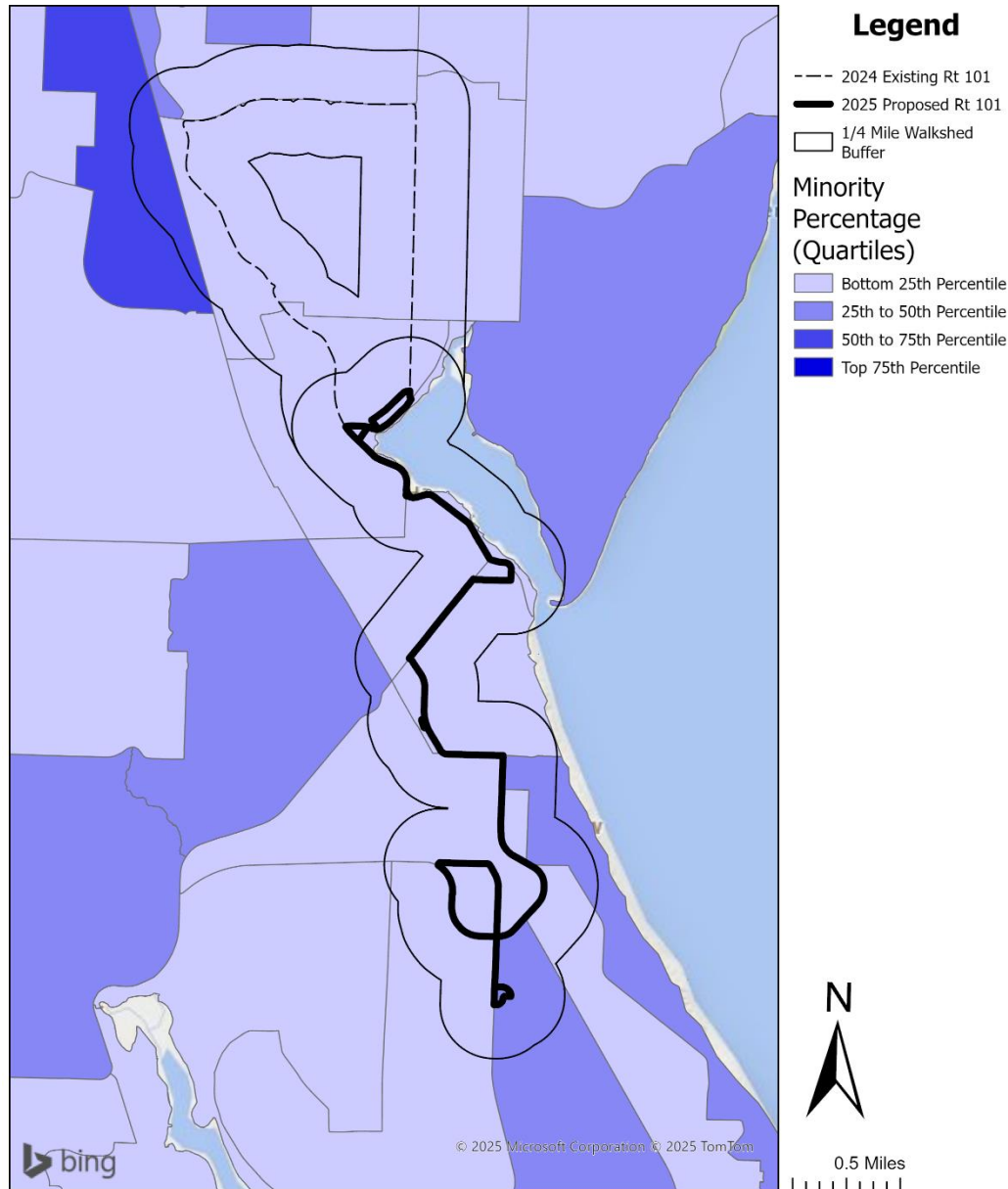


Figure 5-2
**Minority Population relative to
System Average - Route 101**



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 5% more than the average minority population of Pierce Transit's service area. An adverse effect is defined in the Major Service Change Policy 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. The proposed changes to seasonal service in Gig Harbor would serve a population composed of 14% minorities, which is 2.3% less than the prior service configuration of 16.3%, and 27.3% less than the system average minority population of 41.3%. Because the impacted minority population is less than the system average in both scenarios, there is no 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. An adverse effect is defined in the Major Service Change Policy 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. The proposed changes to seasonal service in Gig Harbor would serve a population composed of 8% households below the poverty level, which is 1.1% more than the prior service configuration of 6.9% and 1.3% less than the system average households below the poverty level of 9.3%. Because the low-income household percentage is less than the system average in both scenarios, there is no Disproportionate Burden.