

TITLE VI ANALYSIS: NEW SPANAWAY TRANSIT CENTER

I. Background

A Spanaway Transit Center has long been in the planning and aspirations at Pierce Transit. It would not only be the logical termini for the 14.4-mile Bus Rapid Transit (BRT) route along SR7 but provide a much-needed park and ride facility for area residents. Currently the Walmart at 8th Avenue East is the southernmost terminus of our Route 1 service. The stop there is currently functioning beyond capacity as multiple Route 1 buses and SHUTTLE (paratransit) vehicles vie for limited passenger loading and unloading spaces. With the proposed Route 1 BRT service

expansion listed in Puget Sound Regional Council's (PSRC) Long Range Plan (LRP), along with aspirational plans in Pierce Transit's Destination 2040 Long Range Plan Update (LRPU), Pierce Transit would not be able to meet its service objective by the time high capacity transit is introduced in the area.

II. Project Description

The Spanaway Transit Center facility will include passenger boarding areas, a bus turnaround, operator comfort station, enhanced security features and up to 250 parking stalls for transit patrons. It will serve as the southern terminus of the Route 1 service and for the planned Pacific Avenue/SR 7 Bus Rapid Transit system. Our planning partners at Sound Transit and Pierce County agree that this facility could be a catalyst for growth and infill development in the entire corridor as well. The facility is planned to be built in or adjacent to the new Mountain Highway Towne Center. The transit center will complement the County's efforts to create a new Towne Center with its central gathering places for the community to access services and amenities, as well as additional housing

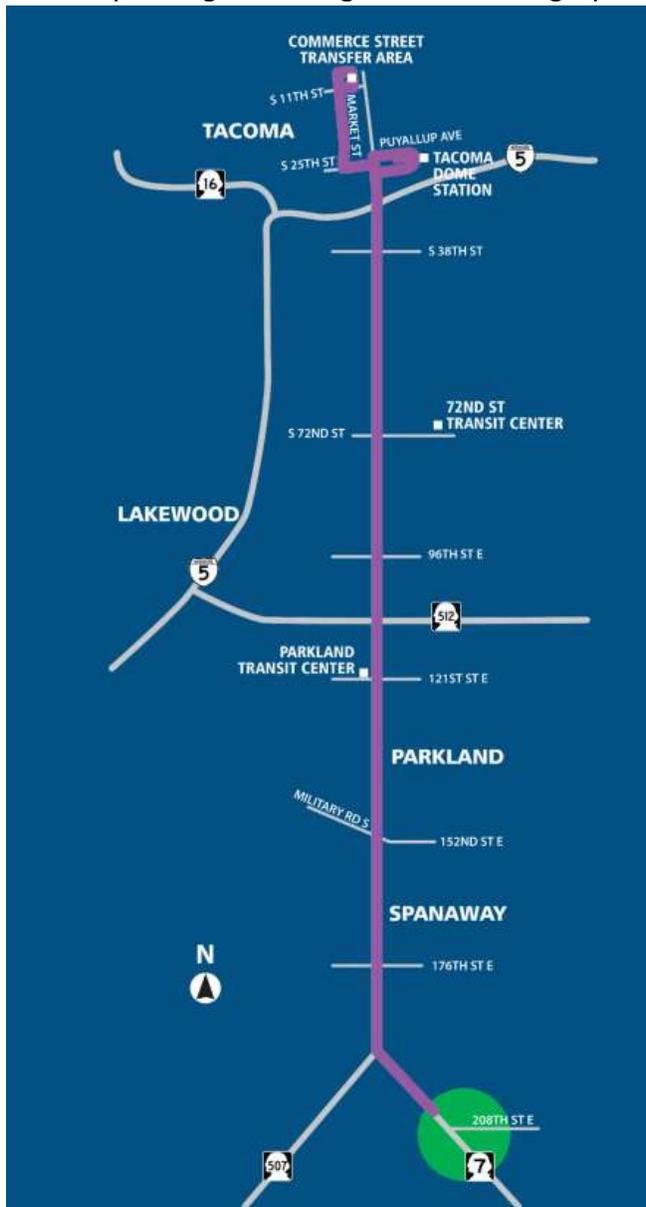


Figure 1: Future Bus Rapid Transit as represented in purple with a noted Transit Center in the Spanaway, WA area.

options such as apartments and townhomes.

III. Title VI Compliance

Transit Centers

According to Pierce Transit's design standards, transit centers will be constructed at locations which permit the operation of a timed transfer system, and which permit convenient access to major passenger destinations. Generally, trunk routes will bypass transit centers unless the center is directly along the line of travel. Trunk routes may not operate on a timed transfer basis.

Appropriate roadway and development improvements in the vicinity of transit centers shall include:

- Sidewalks and roadway crossings to provide pedestrian access from all area neighborhoods
- Roadway improvements, such as HOV lanes and improvements, that permit unimpeded travel for transit vehicles along routes of access and egress to the transit center
- Provision of bicycle facilities that link the transit center with surrounding neighborhoods
- Street lighting that illuminates pedestrian approaches to the transit center
- Encouragement of major new retail and office construction (i.e., high-rise construction is especially appropriate when undertaken in the vicinity of transit centers)
- Location of new retail and office construction so that pedestrian access from the transit center does not require walking through parking lots to reach a building

Generally, transit services provided at transit centers is of sufficient quality that a significant percentage of the employees at any business located within walking distance of the transit center can utilize transit for their commute. Accordingly, it is appropriate to lower the number of employee-related parking spaces provided, which are often mandated in such developments.

FTA Compliance

Pierce Transit has determined that the appropriate selection of the Spanaway Transit Center falls under the provisions in Chapter III-13 of FTA Circular 4702.1B:

13. DETERMINATION OF SITE OR LOCATION OF FACILITIES. Title 49 CFR Section 21.9(b)(3) states, "In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part." Title 49

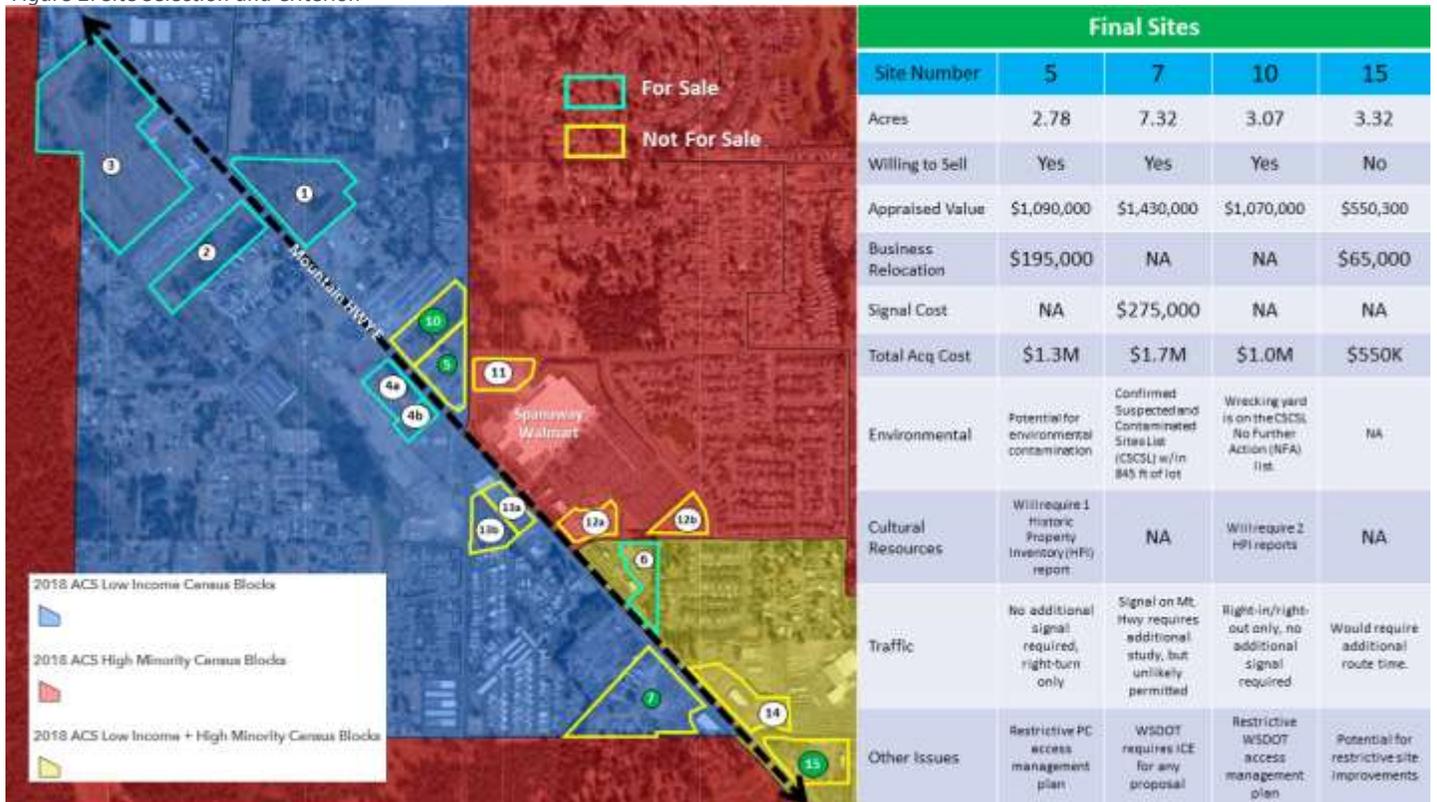
CFR part 21, Appendix C, Section (3)(iv) provides, “The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as these are transit amenities and are covered in Chapter IV, nor does it include transit stations, power substations, etc., as those are evaluated during project development and the NEPA process. Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc.

Therefore, Pierce Transit is required to conduct a Title VI equity analysis to ensure the location is selected without regard to race, color, or national origin. Per the guidance in the FTA Circular, this analysis must:

- Include outreach to persons potentially impacted by the siting of the facility;
- Compare impacts of various siting alternatives;
- Determine if cumulative adverse impacts might result due to the presence of other facilities with similar impacts in the area; and
- Occur before the selection of the preferred site.

If disparate impacts are identified, the least discriminatory alternative must be implemented.

Figure 2: Site Selection and Criterion



Site Selection Process

During 2019, Pierce Transit completed a site selection process to locate a suitable property for the transit center. The process identified 15 sites along the SR7 corridor within about a half mile of the existing terminus of the Route 1 at the Spanaway Wal-Mart. The initial sites identified were a minimum of about three acres and could be acquired by early 2020. The sites were then reviewed using more detailed criteria, including:

- Access to a Signalized Intersection
- Vehicle Access and Circulation
- Site Cost
- Existing Site Development/Business Relocation
- Proximity to Route 1 Terminus
- Site Topography
- Size of Site
- Visibility from SR7
- Pedestrian and Bike Access
- Zoning/Land Use
- Potential for Hazardous Materials
- Site Availability
- Potential for Shared Use
- Availability of Water Utilities
- Availability of Sewer Utilities

Eight sites were eliminated based on the initial review. Conceptual designs were prepared for the remaining seven sites to more fully examine for any fatal flaws, especially related to the key criteria for a transit facility – access. More sites were eliminated during this second round of review. Staff held meetings with Pierce County and WSDOT to further examine access and other issues related to the remaining four sites and two more sites were eliminated, leaving two finalist sites: Site 7 and Site 10. Of the two sites, the recommended site is significantly larger, is located south of the Route 1 terminus and at the edge of the PTBA and has a willing seller. The site was not initially listed for sale, but the owner had indicated they were getting the site ready to put on the market.

V. Alternatives Equity Analysis

While the siting criteria was used to narrow the candidates down to Sites 5, 7, 10 & 15, Pierce Transit analyzed area demographics to ensure that this did not result in disparate treatment on the basis of race, color, or national origin. As shown in Table 1 and Figure 2, the proposed facility is located in a block group that is 25.3% minority – below the Pierce Transit service area average of 36.8%.

Pierce Transit also compared the sites across three additional factors for the purpose of evaluating the relative equity impacts: who would be impacted by each respective site selection; whether either would displace residents or business; and any cumulative impacts from the presence of similar facilities in the area. The results are shown in Table 1.

| Table 1: Equity Impact Comparison of Potential Sites | | | | |
|--|-------------|---------|------------|---------|
| 2018 PTBA Average Minority: 36.8% (PT Disparate Impact Threshold 10%) | | | | |
| 2018 PTBA Average Low-Income: 13% (PT Disproportionate Burden Threshold 5%) | | | | |
| | Site 5 | Site 7 | Site 10 | Site 15 |
| % Minority | 25.3% | 25.3% | 25.3% | 69% |
| % Low Income | 22% | 22% | 22% | 19% |
| Displacement Impacts | NA | NA | NA | NA |
| Other Similar Facilities Approximate to final site | 4a-4b-10-11 | 6-14-15 | 4a-4b-5-11 | 7-14 |
| Source: US Census Bureau 2014-2018 ACS 5 Year Data Set | | | | |

Pierce Transit’s policy (fare and service) 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. 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. 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.



In this case, there is an adverse effect because the final site selected (site 7), along with sites 5 and 10, are in census block groups that have lower than average minority populations by a margin greater than 10%. However, the analysis shows that Route 1 was not serving an area with a high minority population along the Mountain HWY E corridor. In an attempt to select a site that would have the least discriminatory alternative possible, extending Route 1 to reach site 7 would begin to serve a high minority + low-income block group. Site 7 was highly considered for its operational and cost advantages, its adjacency to underserved population groups and its ability to conform to our design guidelines for transit centers, i.e. trunk routes (Route 1) will bypass transit centers unless the center is directly along the line of travel. Although sites 14 and 15 were both located

in a high-minority + low-income block group, they were suboptimal locations due to high costs to relocate business, circulation challenges, and significant development restrictions.

In terms of potential cumulative impacts, Site 7 was used as a dismantling operation for mobile home storage/dumping area since ~2002. Historical aerials indicate that the site has been partially used as overflow storage for an adjacent wrecking yard.

What differs between the sites, however, is the implication for Pierce Transit operations for High Capacity Transit. Site 7 is a good terminus location and provides for the Walmart stop to continue to be served, but with an enhanced transit station. There would be no business relocation requirements and the site is large enough for future expansion. Selection of Site 15, on the other hand, would increase travel times to reach many Pierce Transit customers in the area as it is not as centrally located. An increase in travel times would lead to increased costs and potential environmental impacts, as well as service concerns.

Thus, Pierce Transit has selected Site 7 as the preferred location for the Spanaway Transit Center.

VI. Community Outreach

On March 26, 2019 Pierce Transit asked for feedback on BRT station locations, but no specifics were made to the STC. There were four comments in the vicinity to the Spanaway Transit Center site 8th Ave/Mountain HWY E. that stated that a station would benefit the end user. There were not specific comments on the proposed Spanaway Transit Center.

BRT Related Public Meetings (May 30, 2018 – December 16, 2020)

| Type | Attendees/Unique Pageviews | Comments |
|---------------------------|----------------------------|------------|
| Open House | 97 | 10 |
| Public Hearing | NA | 31 |
| BRT Webpage | 12,245 | NA |
| Virtual Open House | 1,189 | 63 |
| Bus Station Feedback Tool | 912 | 114 |
| BRT Email | NA | 30 |
| BRT Mailer Comment Cards | NA | 24 |
| Total | 14,443 | 272 |

Public and Legal Notice*

- December 23, 2020: Notice of Application and Public Meeting Notice, was sent to property owners within a radius of 300 feet, but not less than two parcels deep, around the exterior boundaries of the subject property.
- December 30, 2020: The site was posted with a Public Notice sign, confirmed with a Declaration of Posting.
- February 17, 2021: Legal Notice was published in the official County newspaper (The News Tribune), advertising the public meeting to be held by the Parkland-Spanaway Midland Advisory Commission.

- March 24, 2021: Legal Notice was published in the official County newspaper (The News Tribune), advertising the public meeting to be held by the Parkland-Spanaway-Midland Advisory Commission.
- March 29, 2021: Public Meeting Notices were sent to property owners within a radius of 300 feet, but not less than two parcels deep, around the exterior boundaries of the subject property advertising the 2nd public meeting to be held by the Parkland-Spanaway-Midland Advisory Commission.

**This section was added June 2021 to include public notice information about the project.*

Vicinity Map



Pierce County Staff Comments:

County staff has reviewed the proposal for compliance with all applicable policies, codes, and regulations. The County finds, based on an initial project review, that the proposal appears to be consistent with the applicable codes and regulations and staff will be recommending approval of the proposal, subject to conditions.

- As proposed, staff did not find that the proposal conflicts with goals or policies in the Parkland-Spanaway-Midland Community Plan Notice posted at Site 7 regarding potential change in use of site.
- To date, the County has not received any comments from nearby property owners in response to the notice of application that was mailed to neighboring property owners

VII. Conclusion

This equity analysis has aimed to guide Pierce Transit on selecting a Spanaway Transit Center location that does not result in disparate impacts on the basis of race, color, or national origin nor a disproportionate burden on low-income households. The process by which Pierce Transit identified and narrowed down potential sites for the facility was based on property size, geographic proximity to the service area, and transportation accessibility based on Pierce Transit design standards for the placement of transit centers. Although the final site is in a low-income block group, it does not meet the 10% margin for high-minority populations based PTBA averages. A resolving approach will extend trunk Route 1 from its existing terminus (Walmart parking lot), to the final site which is juxtaposed to a low-income (LI) + high-minority (HM) block group. This least discriminatory alternative provides better access for LIHM populations to the Spanaway Transit Center, while maintaining service at the Walmart stop location (future BRT station). Given these measures, the analysis of potential equity impacts, and the community outreach, constructing the new Park and Ride facility at the proposed Spanaway site 7, overcomes any apparent disparate impacts and disproportionate burdens.