

# **March 2020 Public Transportation Service Changes**

## **Title VI Service Analysis**

January 2019



## **Introduction**

Federal Transit Administration (FTA) Circular 4702.1B, Chapter V, Section 7 requires transit agencies serving large urbanized areas to evaluate major service changes and to determine whether proposed changes would have a discriminatory impact as defined in the United States Department of Transportation's Title VI regulations.

In accordance with these FTA regulations, this report summarizes Metro's service analysis of changes proposed for the March 2020 service change submitted to the King County Council for approval. As part of the ordinance, Metro is proposing to revise routes that currently serve the north Eastside of King County and to redirect Route 255 to the University of Washington Link light rail station. This report details the results of the Title VI analysis of these changes, known as North Eastside Mobility Project, which impact Bothell, Kenmore, Kirkland, Redmond, Seattle, and Woodinville.

Metro's 2017 System Evaluation Report identifies corridors that are currently below their target transit service levels and identifies and prioritizes the additional hours needed on routes in these corridors to meet the service level targets based on Metro Service Guidelines (also referred to as Priority 3 service investment needs). This project replaces inefficient routes with poor reliability and ridership with a more frequent, more direct network of service and reallocates existing resources to increase span of service, improve frequency and add important connectivity within the region on eight routes and with two flexible services. Metro's adopted 2019/2020 budget includes 5,000 service hours for these mobility upgrades as well as mitigation support for closure of Montlake Freeway Station and end of joint bus-rail operations in downtown transit tunnel.

## **Service Guidelines Overview**

The 2015 update to King County Metro's *Strategic Plan for Public Transportation, 2011-2021* and related service guidelines outline the methodology Metro uses to evaluate service changes, consistent with FTA Title VI requirements (FTA Circular 4702.1B). The most relevant excerpts from the service guidelines are included below.

### **Implementation**

Metro revises fixed-route transit service twice a year—in spring and fall. In rare cases of emergency or time-critical construction projects, Metro may make changes at times other than the two regularly scheduled service changes. However, such situations are kept to a minimum because of the high level of disruption and difficulty they create. Many alternative service projects can be implemented at any time and do not need to follow the same schedule as fixed-route service.

Proposed route changes are subject to approval by the Metropolitan King County Council except as follows (per King County code 28.94.020):

- Any single change or cumulative changes in a service schedule which affect the established weekly service hours for a route by 25 percent or less.

- Any change in route location which does not move the location of any route stop by more than one-half mile.
- Any changes in route numbers.

Each year, Metro publishes a System Evaluation report, based on Metro's Service Guidelines, that outlines the analysis of target service levels and route performance management. The annual report will include a comprehensive list of the prior years' service changes and will identify and discuss service changes that address performance-related issues. Metro works to provide transparency in Metro's process and help jurisdictions plan for the future by conducting regular outreach throughout the county about the results of the System Evaluation Report.

### **Adverse Effect of a Major Service Change**

An adverse effect of a major service change is defined as a reduction of 25 percent or more of the transit trips serving a census tract, in accordance with King County code 28.94.020. Title VI of the Civil Rights Act of 1964 requires all transit agencies to evaluate major service change impacts on minority and low-income populations.

### **Disparate Impact Threshold**

A disparate impact occurs when a major service change results in adverse effects that are significantly greater for minority populations than for non-minority populations. Metro's threshold for determining adverse effects is when the percentage of routes or tracts adversely affected by a major service change and classified as minority is 10 or more percentage points higher than the percentage of routes or tracts classified as minority in the system as a whole. Should Metro find a disparate impact, consideration will be given to modifying the proposed changes in order to avoid, minimize or mitigate the disparate impacts of the proposed changes.

Metro will measure disparate impacts by comparing changes in the number of trips serving minority or non-minority census tracts, or by comparing changes in the number of service hours on minority or non-minority routes. Metro defines a minority census tract as one in which the minority population percentage is greater than that of the county as a whole. For regular fixed-route service, Metro defines a minority route as one for which the percentage of inbound weekday boardings in minority census tracts is greater than the average percentage of inbound weekday boardings in minority census tracts for all Metro routes.

### **Disproportionate Burden Threshold**

A disproportionate burden occurs when a major service change results in adverse effects that are significantly greater for low-income populations than for non-low-income populations. Metro's threshold for determining adverse effects is when the percentage of routes or tracts adversely affected by a major service change and classified as low-income is 10 or more percentage points higher than the percentage of routes or tracts classified as low-income in the system as a whole. Should Metro

find a disproportionate burden, consideration will be given to modifying the proposed changes in order to avoid, minimize or mitigate the disproportionate burden of the proposed changes.

Metro will measure disproportionate burden by comparing changes in the number of trips serving low-income or non-low-income census tracts, or by comparing changes in the number of service hours on low-income or non-low-income routes. Metro defines a low-income census tract as one in which the percentage of low-income population is greater than that of the county as a whole. For regular fixed-route service, Metro defines a low-income route as one for which the percentage of inbound weekday boardings in low-income census tracts is greater than the average percentage of inbound weekday boardings in low-income census tracts for all Metro routes.

## **I. Service Change Area and Routes**

### ***Affected Areas***

The proposed changes will affect 50 census tracts with a total population of 257,072 residents.

### ***Affected Routes***

Shortening and simplifying route 255 and connecting it to high-speed, high-capacity Link light rail at University of Washington station will save service hours and provide the necessary resources to upgrade the frequency and span of the 255 as well as the local network on the North Eastside. The total proposed changes affect routes 234, 235, 236, 238, 243, 244, 248, 255, 277, 930 and Sound Transit routes 540 and 541. While Sound Transit bus routes are noted for reference because some riders use these routes, they are not included in Metro's analysis of impacts from the changes.

Affected routes 234, 235, 236, 238, 243, 244, 248 and will be replaced with more direct, more frequent routes 225, 230, 231, 239 and 250 that offer longer hours of operation. Routes 255 and 930 will be revised to increase their hours of operation and areas they serve.

Sound Transit is also making some complementary changes to their service and the quantitative analysis can be found in their Title VI report. None of their proposed changes will produce disparate impacts on any census tract in the study area.

## **II. Threshold 1: Is this a Major Service Change? YES**

For the purposes of complying with FTA Circular 4702.1B, Chapter IV, Metro defines any change in service as "major" if King County Council approval of the change is required pursuant to KCC 28.94.020.

The proposed changes meet all criteria for a major service change by Metro and FTA definitions. Appendix A lists the specific routes being changed in March 2020.

### III. Threshold 2: Are Minority or Low-Income Census Tracts Affected? YES

#### ***Classifying minority and low income census tracts***

For the Title VI analysis, Metro classifies census tracts as minority tracts if the percentage of the population that is minority within a tract is greater than the percentage for King County as a whole. Based on the American Community Survey five-year rolling average for 2012-2016 data, 36.5 percent of the population is classified as minority within the county as a whole. Similarly, Metro classifies census tracts as low-income tracts if the percentage of the population classified as low-income (based on the population below 200% of federal poverty line) within a tract is greater than the percentage for King County as a whole.

In line with recommendations made by the Service Guidelines Task Force, Metro recently changed the definition of “low-income” that is used to determine census tract designations from 100% to 200% of the federal poverty line, which aligns with the threshold of other programs, including ORCA LIFT. Based on the American Community Survey five-year rolling average for 2012-2016, 24.4 percent of the population is classified as low-income within the county as a whole.

The proposed service changes addressed in this report will affect the level of service provided to 50 King County census tracts currently served by Metro. The low-income and minority characteristics of affected census tracts are provided in Table 1 below and figures 1 and 2 on the following pages.

**Table 1.** Low-Income and Minority Characteristics of Affected Census Tracts

Census Tract Classification				
Total Census Tracts Affected	Minority & Low-income	Minority ONLY	Low-income ONLY	Neither Minority nor Low-income
50	2	11	6	31

### IV. Threshold 3: Is there a Disproportionate Burden on Low-Income Populations or a Disparate Impact on Minority Populations? NO

For the Title VI analysis, the determination as to whether the proposed changes resulting in a reduction in service would have a disparate impact on minority populations was made by comparing changes in the number of Metro bus trips serving minority or non-minority census tracts. Similarly, the determination as to whether the proposed changes resulting in a reduction in service would have a disproportionate burden on low-income populations was made by comparing changes in the number of Metro bus trips serving low-income and non-low-income census tracts. The September 2018 service change was used as the baseline for calculating the change in trips.

The proposed changes together affect 50 census tracts, including 11 minority-only census tracts, 6 low-income only census tracts, and 2 tracts which are both minority and low-income. There are no low-income tracts and 1 minority tract experiencing a reduction in trips greater than the threshold of a 25 percent reduction in trips used to

determine whether there is a disparate impact on minority populations or disproportionate burden on low-income populations. However, the analysis does not show a disparate impact because the percentage of minority tracts with adverse effects does not exceed the percentage of minority tracts countywide by greater than 10 percent.

Notes for Tables 2 and 3

1. An adverse effect is defined as a reduction of 25 percent or more in trips per week.
2. Tracts are classified as low-income or minority when the percentage of low-income or minority persons in the tract is greater than the percentage of low-income or minority persons in the county as a whole.
3. A disproportionate burden occurs when the percentage of low-income tracts with adverse effects is more than 10 percentage points greater than the county-wide percentage of low-income tracts.
4. A disparate impact occurs when the percentage of minority tracts with adverse effects is more than 10 percentage points greater than the county-wide percentage of minority tracts.

**Title VI Analysis Results for Proposed Changes for March 2020**

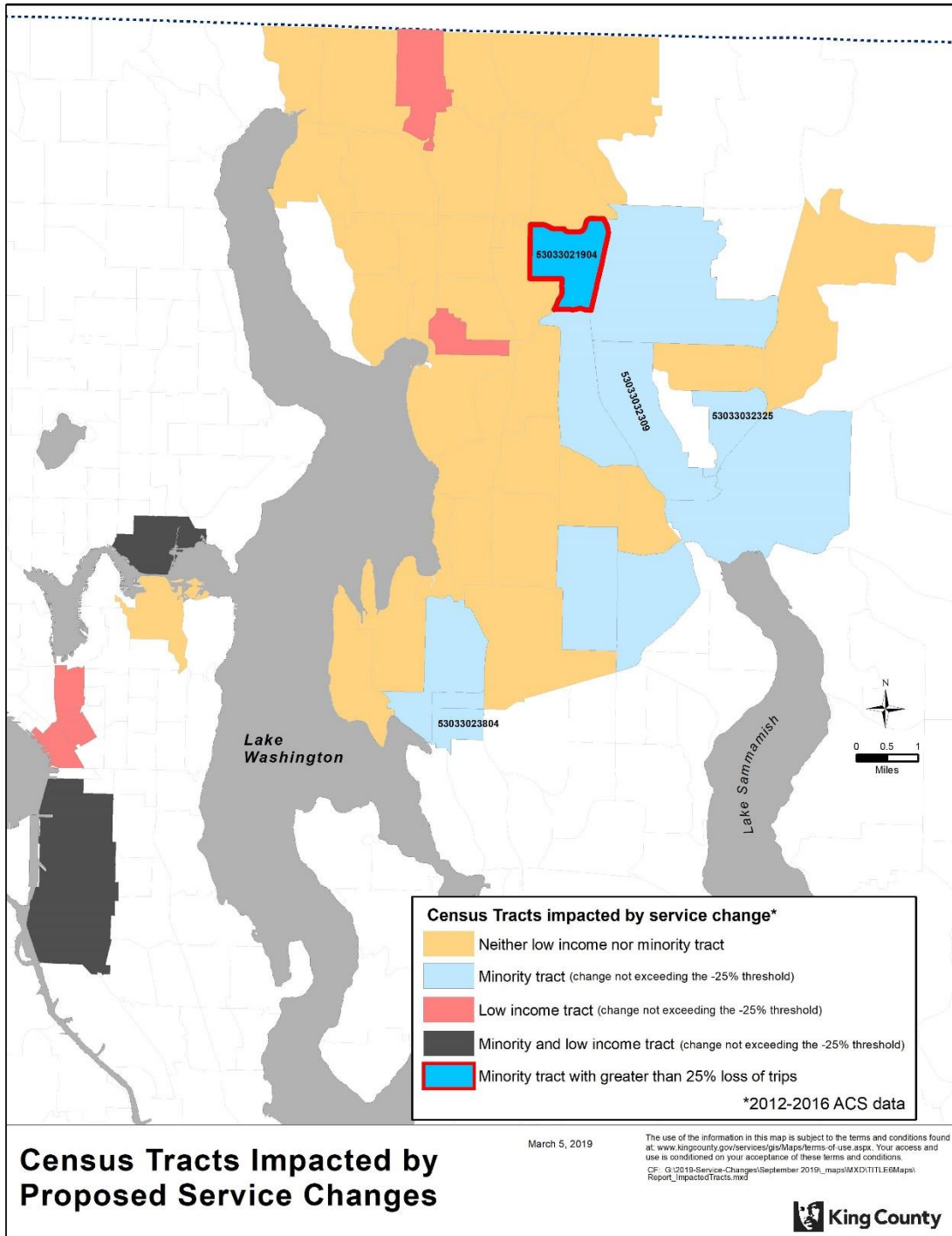
**Table 2.** March 2020 Service Change Title VI Analysis - Low-Income Populations

Category <sup>2</sup>	Tracts with Adverse Effects <sup>1</sup>	% of tracts adversely affected	% of tracts system-wide	Difference	Disproportionate Burden <sup>3</sup> ?
Low-Income	0	0%	41%	N/A	<b>NO</b>
Non-Low-Income	4	100%	59%		
Total	4	100%	100%		

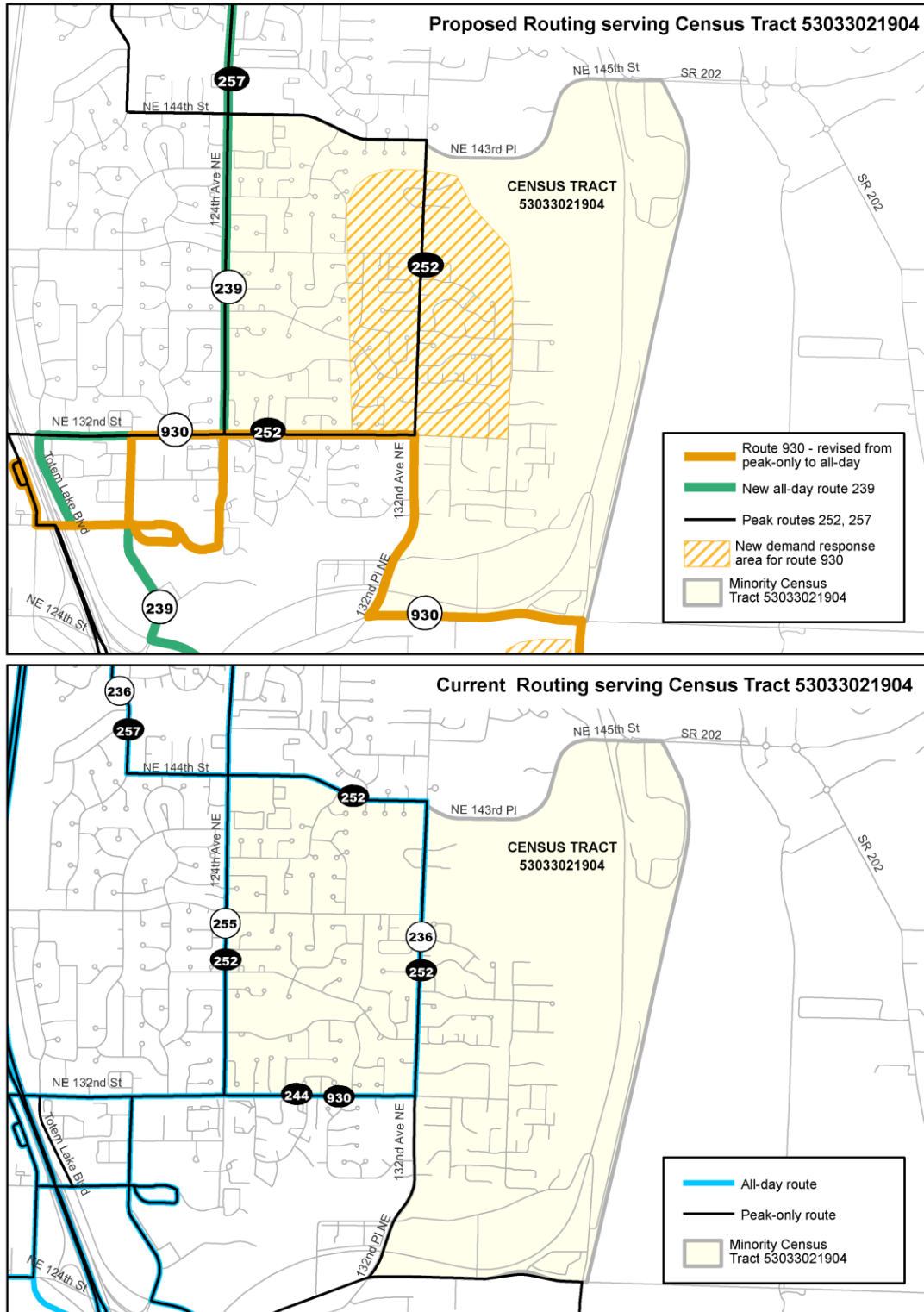
**Table 3.** March 2020 Service Change Title VI Analysis - Minority Populations

Category <sup>2</sup>	Tracts with Adverse Effects <sup>1</sup>	% of tracts adversely affected	% of tracts system-wide	Difference	Disparate Impact <sup>4</sup> ?
Minority	1	33%	43%	10%	<b>NO</b>
Non-Minority	3	67%	57%		
Total	4	100%	100%		

**Figure 1.** Impact of proposed changes on minority &/or low-income census tracts.



**Figure 2.** Impact of proposed changes on minority census tract.





## **V. Threshold 4: Alternatives and Mitigation**

As stated in Section IV, there are adverse effects as defined by the Title VI regulations in 4 census tracts, for the proposed service changes on the north Eastside for March 2020. As shown in Figures 1 and 2, some low-income and minority census tracts are impacted, but not to the degree of creating an adverse impact per the Title VI requirements.

To mitigate for the impacts of the proposed changes on the minority census tract with adverse effects, an additional flexible service area on DART Route 930 has been added in Tract 53 033 021904. Residents will be able to utilize the flexible service area to access the fixed-route portion of Route 930 that runs between the Totem Lake Transit Center and the Redmond Transit Center. Frequency and span of service on this route will be increased to every 30 minutes throughout the day.

Tracts 53 033 032309, 53 033 023804, and 53 033 032325, classified as minority tracts, will actually experience a greater than 25 percent increase in the number of trips with the proposed changes on the north Eastside for March 2020.

Though it is not included in this analysis, Sound Transit changes are relevant to the discussion of alternatives for riders as well. Sound Transit is proposing changes to routes 540 and 541 in March 2020 as well. Routes 540 and 541 are proposed to be replaced by new Route 544, which will travel between Overlake and South Lake Union.

## APPENDIX A: Affected Routes and Rider Alternatives

Route	Action	Alternatives
234	Route 234 will be deleted	Replaced by new Routes 225, 230, 231 and 250
235	Route 235 will be deleted	Replaced by new Routes 239 and 250
236	Route 236 will be deleted	Replaced by new Routes 230, 231 and 930 as well as a flexible service
238	Route 238 will be deleted	Replaced by new Routes 225, 230, 231, 239 and 250
243	Route 243 will be deleted	Replaced by additional service on Route 930
244	Route 244 will be deleted and	Replaced by new Route 225 and additional service on route 930
255	Route 255 will be revised to operate between Totem Lake Transit Center and the University of Washington Link light rail station.	N/A
277	Route 277 will be deleted	Replaced by new Route 255
930	Route 930 will operate between Redmond Transit Center and Totem Lake Transit Center, with revisions to Dial-A-Ride (DART) service areas along Willows Road NE. An additional DART service area will be added north of NE 132 <sup>nd</sup> Street along 132 <sup>nd</sup> Ave NE.	N/A