

To: Board of Directors
From: Thomas Tumola, Planning Manager
Date: August 18, 2021
Subject: Title VI Impact Analysis: March 2022 Service Change

BACKGROUND

In compliance with federal regulations, Community Transit evaluates service change proposals for disparate or disproportionate impacts to ethnic minorities and low-income populations. If disproportionate impacts exceed adopted thresholds, Title VI policy requires justification for the impacts, evaluation of lower impact alternatives, and/or mitigation. The analysis is subject to public review and becomes part of the record to be considered by decision makers in approving the proposed changes. Board policy (Resolution #04-12) requires an impact analysis and public hearing for service changes that alter 25 percent or more of a route's geography or service hours, and for service changes that call for elimination of a route. Service changes that meet this threshold are considered "major service changes."

STATUS

In alignment with other transit agencies nationally, Community Transit's service levels between March 22, 2020 and September 20, 2020 were changing rapidly due to the emergency response related to the COVID-19 pandemic. Resolution 01-20 granted the CEO emergency authority to make temporary changes to routes and schedules without the public process and board approval requirements outlined in Resolution 04-12. In consultation with Federal Transit Administration (FTA) staff, all service changes since September 2020 will be reevaluated and formalized as Community Transit's new baseline service level.

This memorandum establishes the September 2020 service change as Community Transit's new baseline service level for purposes of Title VI equity impact analysis, and provides an equity evaluation of service changes subsequently implemented in March 2021 and planned for October 2021 and March 2022. Changes to the 800 series bus routes planned for October 2021 were evaluated for Title VI separately and that analysis was reviewed by the Board of Directors in their November 2020 approval of the Northgate Station Service Plan.

ANALYSIS

The Community Transit budget allocates 7,000 annual service hours for service improvements at the March 2022 service change. This comprises approximately a 2% increase over the service operated by Community Transit cumulatively since September 2020, including recent changes in March 2021 and changes planned for October 2021. The table below illustrates the historically unprecedented, rapid reduction and incremental restoration of service between March 2020 and March 2022 in response to the COVID-19 pandemic.

Community Transit Bus System, Annualized Service Hours, 2020-2022	
Service Implementation Date	Service Level (vs. Pre-COVID March 2020 Service)
March 22, 2020 (pre-COVID)	100% (468,304 Annual Hours)
March 30, 2020	79% (372,254)
April 13, 2020	72% (336,647)
July 5, 2020	80% (376,640)
September 20, 2020 (new baseline)	87% (410,237)
March 21, 2021	87% (409,450)
October 3, 2021	90% (420,503)
March 20, 2022	92% (427,468)

Current emergent pandemic-related transit ridership impacts and the potential for travel pattern changes related to the 800-series route restructure at Northgate Station in October 2021 have put ridership forecasts in a place of uncertainty. In response, Service Planning has developed a range of proposals for both local and commuter route groups that can be scaled and balanced to best accommodate the needs and demand that arise after the October 2021 service change.

The following table shows service hour change for September 2020 against October 2021. As scenarios are still being evaluated, this table does not include the March 2022 proposed changes. A full Title VI analysis will be made available when the final March 2022 service change proposal is presented to committee in October and the board in November 2022.

Each category in the table has the total number of annualized bus service hours and % change from 2020 to 2021. Staff notes that Route 270 was the only local route to undergo a greater than 25% change in service. The change was for an increase of 45%, from 1,050 to 1,517 annual hours, and an increase of 3 trips from 4 in 2020 to 7 in 2021. The increase of 3 trips was made to meet essential trip demand as Route 270 was showing regular overcrowding due to pandemic capacity restrictions. This increase does not warrant further analysis as this was not a disparate impact to Title VI protected populations.

Staff has evaluated the full range of March 2022 potential service proposals and has determined that none of the scenarios will qualify as a major service change and there will be no anticipated disparate impact on Title VI protected populations. Final count of annual hours will be computed after one of the three March 2022 service scenarios is selected for implementation.

Per this analysis and the table below, staff have concluded that bus service changes implemented in March 2021, and planned service changes in October 2021 and March 2022 do not result in a disparate impact to Title VI routes, as identified in Community Transit’s Title VI Program document.

Title VI Impact Analysis Summary				
Route Type	September 2020 Annual Hours	October 2021 Annual Hours	March 2022 Annual hours	% Change
800 Series	20,489	26,699	TBD**	30%
Non-Title VI	14,348	14,289	TBD**	0%
Title VI	375,399	379,515	TBD**	1%
Totals	410,237	420,503	TBD**	3%

**Staff has conducted the standard analysis on the full range of March 2022 potential proposals and has determined that each of the following scenarios will not qualify as major service changes and will not have a disparate impact on Title VI protected populations. Final count of annual hours will be computed after one of the three scenarios is selected for proposal.

MARCH 2022 SERVICE SCENARIO DESCRIPTIONS

Scenario 1 invests approximately 7,000 hours in local service. Route 115 would receive new service on Sunday, matching service span and frequency that is currently offered on Saturday. The remaining routes will receive trip restorations that were reduced in 2020. This scenario does not include any changes to routing.

Scenario 2 includes approximately 4,000 hours of trip additions to commuter service, Sunday service on Route 115, and restoration of trips on 4 local routes. This scenario does not include any changes to routing.

Scenario 3 includes approximately 7,000 hours of trip additions to commuter service by adding additional trips. This scenario does not include any changes to routing.

RECOMMENDATION

When the proposal is finalized in October 2021, a final Title VI analysis will be provided to the Board of Directors as required background information for service change decisions per Community Transit's adopted policy.

A public comment period on Community Transit's new baseline service level and this Title VI analysis will be held from September 3, 2021, through October 7, 2021. A public hearing will be scheduled at the October 7, 2021, Board of Directors meeting.