

**Your New GRTC Transit System
Proposed Service Changes
Title VI Preliminary Analysis**

Note: This is a preliminary Title VI analysis as GRTC is in the process of completing final schedules for all the Your New GRTC Transit System changes. Once schedules are finalized and entered in Hastus, the final Title VI analysis will be completed and brought back to the Board of Directors for signature in November 2017.

Service and Fare Equity (SAFE)

GRTC has a fare and service equity analysis policy and process to evaluate proposed service and fare changes. The Service and Fare Equity (SAFE) process shall be performed in any and all of the following conditions:

- Any fare change (increase or reduction) is considered on one or more routes or services (local, express, specialized, or other)
- A major service change (increase or reduction) is considered on one or more routes or services




All major service changes shall undergo a service equity analysis to ensure that these changes do not have disparate impacts on minority populations, or impose a disproportionate burden on low-income populations, consistent with the intent and requirements of FTA Circular 4702.1B and Title VI of the Civil Rights Act of 1964.

Service Change Summary for Your New GRTC Transit System:

GRTC currently has 44 fixed routes; the proposed service changes will eliminate 30 routes, replacing them with new routes that will serve a comparable service area. The other 14 routes will remain, but will experience service changes. A new mode, bus rapid transit, will also be introduced as part of the proposed service changes. The proposed start date for service changes associated with Your New GRTC Transit System is March 2018.

Identifying Major Service Change

Any proposed service change meeting the below thresholds on a single route level in the GRTC system will constitute a major service change. The highlighted categories identify the criteria that have been triggered by the proposed service changes with Your New GRTC Transit System.

Category	Level of Change Required to be Classified as a Major Change	Examples
 a. Change in number of trips	25% change in number of scheduled one-way trips on the Weekday, Saturday or Sunday schedule.	Decreasing number of trips from 80 daily one-way trips to 50 one-way trips.
b. Change in service span	25% change in the number of hours between the beginning and end of the Weekday, Saturday or Sunday schedule, in either direction.	Changing Weekday span on a route from 20 hours to 15 hours or less.
c. Redirecting a route	Rerouting at least 25% of a route's path onto a different street or road, measured in single-direction route miles.	Moving two miles of an eight-mile route to another street or road (even if the new routing is very near the current routing).
d. Change in total miles serviced by the route	25% change in total miles on a route's path	Extending or shortening a line.
 e. Shortlining or Longlining	25% change in number of scheduled one-way trips ending at a route's terminal points.	On a route originally going from points A to B to C, terminating certain trips at B. On a route originally going from A to B, extending certain trips to travel all the way to point C.
 f. Eliminating Route(s)	Eliminating one or more routes.	Discontinuing an existing route (even if replacing this route with nearby service).

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Any proposed service change meeting the following **system-level** thresholds will also be considered a major change requiring a service equity analysis:

Category	Level of Change Required to be Classified as a Major Change	Examples
★ a. Adding New Route(s)	Adding one or more new routes .	Creating a new route to reaching a previously unserved area.
b. Change total daily revenue hours	25% change in revenue hours over the system on the Weekday, Saturday or Sunday schedule.	Reduction of 30% of weekday revenue hours due to a budget shortfall.

Disparate Impact Analysis

“Disparate impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient’s policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.” (FTA)

Title VI of the Civil Rights Act prevents discrimination based on race, color and national origin in federally-funded programs or activities. GRTC will ensure that all service changes will be equitable in terms of Title VI. In order to ensure equity in access to transit service across the service area, major service changes shall not adversely affect minority populations more than non-minority populations, by more than the threshold defined below. Furthermore, service changes that result in increases in service shall not benefit non-minority populations more than minority populations, by more than that same threshold defined below. If the difference in measured effects on minority and non-minority populations is greater than the set threshold, the proposed change would be considered to have a **disparate impact** on minority populations.

The threshold shall be a **20-percentage point** difference between:

1. The percentage of impacts borne by minority populations in the proposed service change, and
2. The percentage of minority populations in GRTC’s service area.

Given that minorities are approximately 60% of the population in the City of Richmond. This means that:

- If service increases, minorities must receive at least 40% of the benefit.
- If service decreases, minorities cannot bear more than 80% of the burden.

	Description	Minority	Non-Minority	All
Preliminary System Change Analysis	Existing People-Trips	5,374,687,005	4,188,464,660	9,563,151,665
	New People-Trips	6,285,795,610	4,309,047,985	10,594,843,595
	Change	911,108,605	120,583,325	1,031,691,930
	Change	17%	3%	11%
	Percent of burden/benefit	88%	12%	100%
	Allowed range for percent of benefit	+40% or higher		

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Disproportionate Burden Analysis

“Disproportionate burden refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.” (FTA)

Per the requirements of FTA Circular 4702.1B, and understanding the linked nature of civil rights and environmental justice issues, GRTC will also ensure that all service changes will be equitable with respect to low-income populations. In order to ensure equity in access to transit service across the service area, major service changes shall not adversely affect low-income populations more than non-low-income populations, by more than the threshold defined below.

Furthermore, service changes that result in increases in service shall not benefit non-low-income populations more than low-income populations, by more than that same threshold defined below. If the difference in measured effects on minority and non-minority populations is greater than the set threshold, the proposed change would be considered to have a **disproportionate burden** on low-income populations. GRTC shall also describe alternatives available to low-income passengers affected by the service change.

The threshold shall be a **20-percentage point** difference between:

1. The percentage of impacts borne by low-income populations in the proposed service change, and
2. The percentage of low-income populations in GRTC’s service area.

Given that low-income populations are approximately 37% of the population in Richmond. This means that:

- If service increases, low-income populations must receive at least 17% of the benefit.
- If service decreases, low-income populations cannot bear more than 57% of the burden

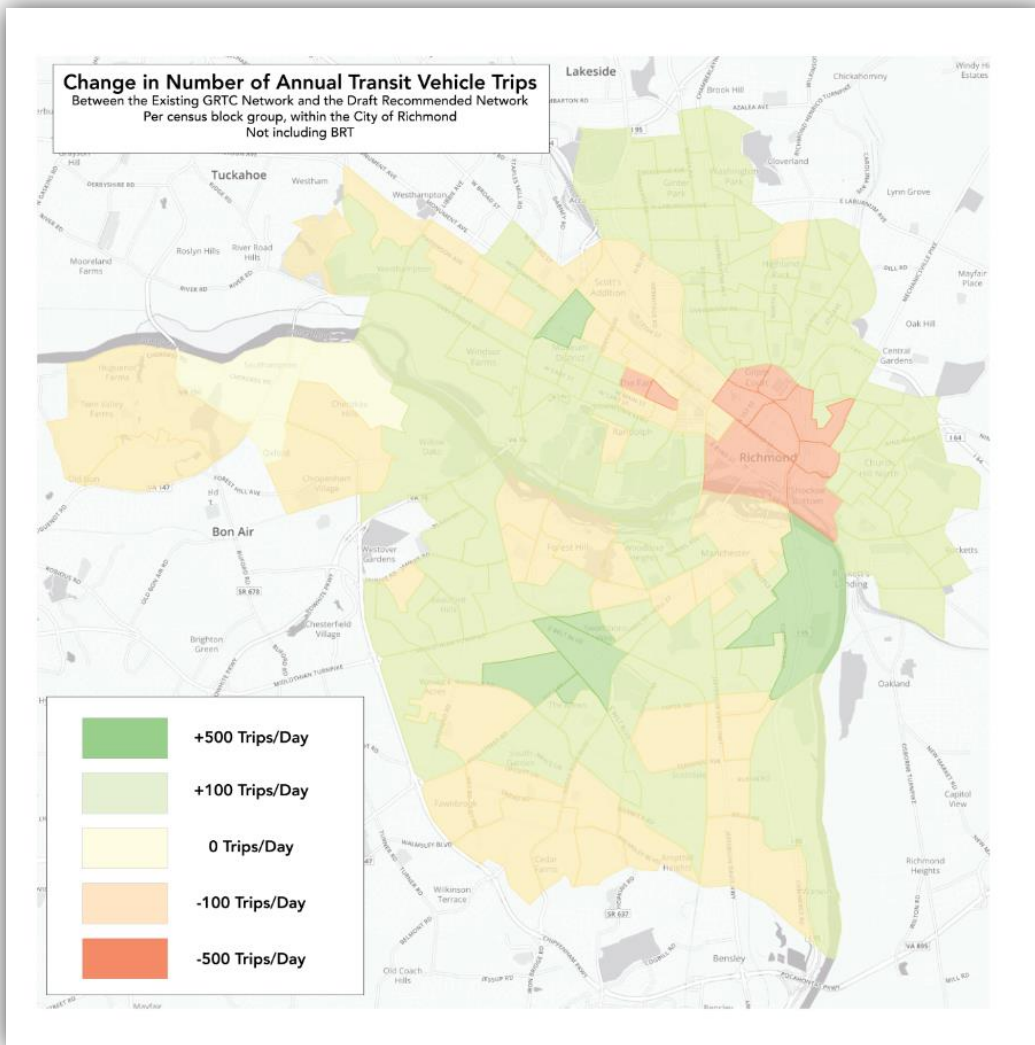
	Description	Low-income	Non-low-income	All
Preliminary System Change Analysis	Existing People-Trips	4,180,628,718	5,382,522,947	9,563,151,665
	New People-Trips	4,554,940,423	6,039,903,172	10,594,843,595
	Change	374,311,705	657,380,225	1,031,691,930
	Change	9%	12%	11%
	Percent of burden/benefit	36%	64%	100%
	Allowed range for percent of burden	+17% or higher		

Conclusion

According to GRTC’s Title VI policy guidelines, the service change proposed with Your New GRTC Transit System is categorized as a major change. Preliminary analysis of the proposed service changes proves no disparate impact or disproportionate burden. The service changes prove to be equitable according to the analysis process described in the policy.

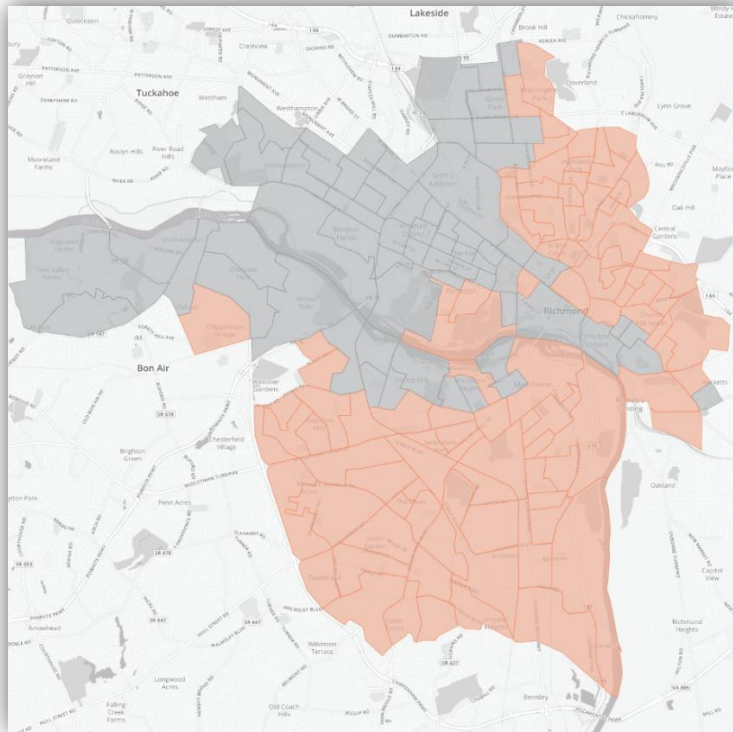
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Supplemental Maps:



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Predominantly Minority Census Block Groups (Orange)



Predominantly Minority Census Block Groups (Orange)

