

# **Title VI Service Equity Analysis**

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## **City of Phoenix Proposed October 2024 Service Change**



**City of Phoenix Public Transit Department**



## **INTRODUCTION**

Title VI of the Civil Rights Acts of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance. Federal law requires the City of Phoenix to evaluate service changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory impact. This process will be used to evaluate bus services in an objective manner to identify the potential for adverse, disproportionately high, or disparate impacts to minority and/or low-income populations.

The Phoenix Public Transit Department (PTD) manages modification to the region's transit network through service changes. Bus service changes are coordinated regionally and occur in April and October each year. Service modifications that are considered major service changes require service equity analysis to be conducted and considered by the Phoenix City Council before approval.

## **SERVICE EQUITY ANALYSIS POLICIES**

This section describes Phoenix's Title VI Service Equity analysis policy, definition, and data analysis procedures. The City of Phoenix Public Transit Title VI Program is posted at <https://www.phoenix.gov/publictransit/title-vi-notice>

### **Major Service Change**

The Major Service Change and Service Equity Policy developed jointly by both the City of Phoenix and Valley Metro defines a major service change as follows:

- Adding or eliminating an entire route
- Expanding or reducing existing revenue miles on a route by more than 25% on Weekday, Saturday, or Sunday
- Expanding or reducing number of route directional miles more than 25%<sup>1</sup>A change resulting in a 25% or greater variance from the existing route alignment<sup>12</sup>

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<sup>1</sup> A change of 25 percent in weekly route revenue miles and/or route directional miles is the City of Phoenix threshold for determining whether a potential transit service change qualifies as a major service change (or "substantial" service change), according to the City of Phoenix resolution (1990). This percentage is generally an industry-wide percentage threshold used by peer transit systems throughout the United States. The City of Phoenix resolution also specifies that a public comment period will be initiated when a change in transit service of 25 percent or more is determined. Valley Metro has adopted the same thresholds.

<sup>2</sup> A change of 25 percent in Express/RAPID service route revenue miles and/or route directional miles does not apply to the portion of the routes that are on the freeway/highway because there are no stops or service. Only the portion of the routes that occurs on surface streets applies to the 25 percent threshold for a major service change.



All service change proposals that are determined to be a major service change will undergo Service Equity Analysis.

### Adverse Effect

An adverse effect is defined as a reduction or addition in service that includes but is not limited to: changes in span of service, changes to frequency of service; the addition of new routes; the elimination of routes or route segments; or the modification of routes or route segments.

### Disparate Impact

When the difference in adverse impacts between minority ridership<sup>3</sup> and/or population<sup>4</sup> and non-minority ridership and/or population on the affected service is equal to or greater than **five percent** compared to the transit system's minority and non-minority ridership<sup>5</sup> and/or population, there would be a disparate impact.

### Disproportionate Burden

When the difference in adverse impacts between low-income ridership<sup>3</sup> and/or population<sup>4</sup> and non-low-income ridership and/or population on an affected service is equal to or greater than **five percent** compared to the transit system's low-income and non-low-income ridership<sup>5</sup> and/or population, there would be a disproportionate burden impact.

Should Valley Metro or the City of Phoenix find any disparate impact or disproportionate burden is found during the service equity analysis, steps will be taken to avoid, minimize, or mitigate the impacts.

### Equity Analysis Data Sources

The following table identifies the data source for the service equity analysis depending on the type of service change being proposed.

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<sup>3</sup> The determination of the transit system and an affected route's minority and/or low-income ridership will be derived from the most recently completed, statistically valid regional on-board origin/destination survey.

<sup>4</sup> The determination of the potential ridership for service expansion or the addition of a new service will be derived from the most recent American Community Survey data for the census tract or census block group surrounding the expanded route or new route.

<sup>5</sup> The transit system's ridership is separated into Local Bus Service (local fixed bus routes, key local service, light rail, streetcar and circulator bus service) and Express/RAPID Service (commuter bus service). The affected service would be compared to the overall transit system's ridership by Local Bus Service or Express/RAPID Bus Service.



Category	Action	Sub Action	Evaluation Method
Service Level <sup>6</sup> Change	Reduction	Not Applicable	O/D <sup>7</sup> Data
	Expansion	Not Applicable	
Route Length	Reduction	Not Applicable	O/D Data
	Expansion	Not Applicable	Census Data
Route Alignment Change	Reduction	Not Applicable	O/D Data
	Expansion	Not Applicable	O/D Data and Census Data
	Modification	Eliminated Segment(s)	O/D Data and Census Data
		Segment(s) to New Areas	Census Data
	Elimination	Not Applicable	O/D Data
New Route	New Route	Not Applicable	Census Data
Fare Media Access	Modifications	Not Applicable	O/D Data Census Data

### Transit System Minority/ Low-Income Population Benchmarks

#### Service Equity Analysis Service Area - 2022 ACS Data

Service Type	Minority	Low-Income (150%)
Local Bus	53%	22%
Circulator	58%	26%
Express/RAPID Bus	49%	20%

#### Service Equity Analysis - 2023 O/D Data

Service Type	Minority	Low-Income
Local Bus	65%	51%
Circulator	72%	63%
Express/RAPID Bus	38%	19%

<sup>6</sup> Service Level- Refers to the span of service, days of operations, trips and headways (service frequencies) for a transit route or the regional transit system.

<sup>7</sup> Origin/Destination Survey Data



## **Description of Proposed October 2024 Changes**

Following is a brief description of the proposed service changes, followed by details of current service and the proposed changes.

The Public Transit Department (PTD) is proposing to modify the east end of Route 13 (Buckeye Road) to terminate at the PHX Sky Train 24th Street Station, near 24th Street and Buckeye Road. This modification was requested by the Phoenix Aviation Department, which would remove duplicative service with Sky Train service between 24th Street and Terminal 3, as well as alleviate vehicle congestion on Sky Harbor Boulevard.

In addition, the Gila River Indian Community (GRIC) is requesting Valley Metro to extend Route 77 (Baseline Road) west to 83rd Avenue and Sunshine Road to service the GRIC Community Service Center. Route 77 operates in, and is funded by, Phoenix, Mesa, and Tempe.

### **Current Route Description**

**Route 13:** The route runs on Buckeye Road between 75th Avenue (to the west) and former site of Sky Harbor Airport Terminal 2 (to the east).

**Route 77:** Valley Metro operates the route on Baseline Road between 75th Avenue in Phoenix, to the West Mesa Park and Ride at Country Club Drive.

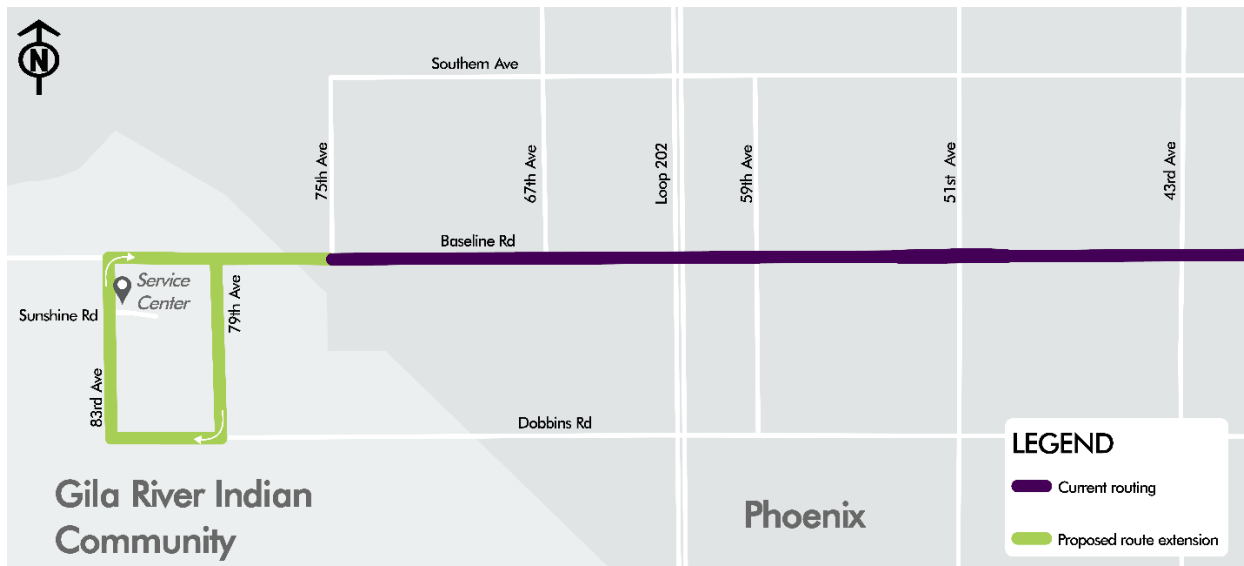
### **Proposed Changes**

**Route 13:** Modify the east end of the route to terminate at the PHX Sky Train 24th Street Station and remove service on Buckeye Road and Sky Harbor Boulevard between 24<sup>th</sup> Street and Terminal 3. Bus passengers would use the PHX Sky Train to access airport terminals.

The PHX Sky Train extension to the Rental Car Center, via the 24th Street Station, was opened in December 2022. Since then, Route 13 passengers have the option to either alight the bus at 24th Street and use the PHX Sky Train to access airport terminals, or they can continue to ride the bus to the end of the route near the former Terminal 2 site and walk to the Terminal 3 Sky Train Station to either access Terminal 3 or take the Sky Train to Terminal 4. With the proposal to end Route 13 at the 24th Street Sky Train Station, riders can continue to make connection via the Sky Train to access Sky Harbor Airport Car Rental Center, Terminal 3, and Terminal 4.



**Route 77:** Extend the route westward to 83rd Avenue to serve the GRIC Community Service Center. The extension is one mile in each direction, most of it within the jurisdiction of the GRIC. If approved, the extension would increase Phoenix revenue miles by 0.2 miles, per trip in each direction.



### Public Input Process

The Public Transit Department uses the locally adopted public outreach process to solicit public feedback on proposed service changes.

The public input process takes place from May 6 to June 7, during which time Phoenix and Valley Metro staff will begin the public input process and conduct in-person and virtual outreach utilizing posters and A-Frame signs placed at key areas along each route to notify the public of the proposed changes, and direct



passengers to Valley Metro’s website to submit comments. The proposed changes are also be advertised via social media, interactive webinars, and a public hearing, which is scheduled on Wednesday, May 22 at Valley Metro’s offices, Conference Room 10A and online via Webex.

### **SERVICE EQUITY ANALYSIS OF OCTOBER 2024 SERVICE CHANGES**

The first step of the Title VI assessment is to measure and document the magnitude of service change being proposed to determine if a project qualifies as a “major service change”.

**Table 1: Magnitude of Impact- Revenue Miles Change**

Routes	Current Revenue Miles			Proposed Revenue Miles			% Difference		
	Weekday	Saturday	Sunday	Weekday	Saturday	Sunday	Weekday	Saturday	Sunday
Route 13	949	900	900	884	840	840	-7%	-7%	-7%
Route 77	1,141	1,081	1,046	1,155	1,094	1,059	1%	1%	1%

**Table 2: Magnitude of Impact- Directional Miles Change**

Routes	Current Directional Miles	Proposed Directional Miles	% Difference
Route 13	12	11	-7%
Route 77	24	27	12%

**Table 3: Magnitude of Impact- Major Change Indicators by Individual Projects**

	Add or Eliminate Route	Expanding or reducing existing route by more than 25% of Weekday route revenue miles	Expanding or reducing existing route by more than 25% of Saturday routes revenue miles	Expanding or reducing existing route by more than 25% of Sunday route revenue miles	Expanding or reducing number of route directional miles more than 25%	A change resulting in a 25% or greater variance from the existing route alignment	Continue to Assess Mitigation
Route 13	No	No	No	No	No	No	No
Route 77	No	No	No	No	No	No	No

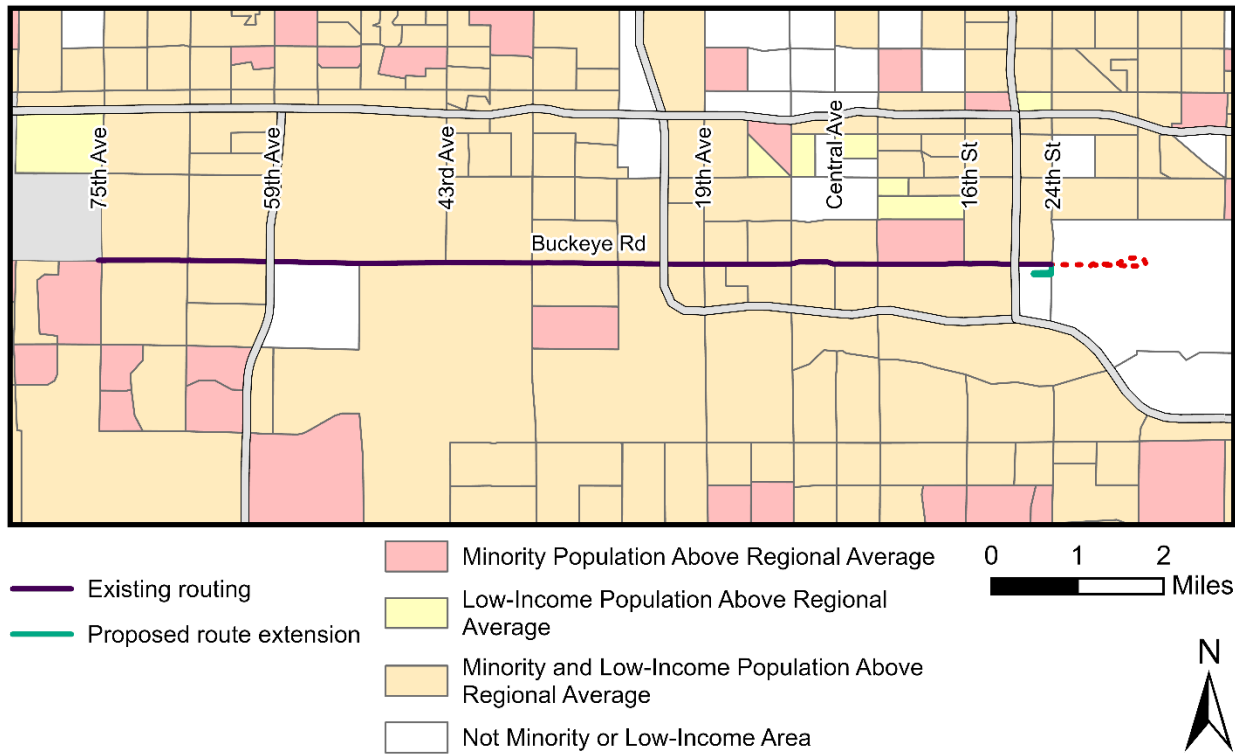
### **Magnitude of Service Change Assessment Findings**

None of the proposed service changes qualifies as a major service change, therefore no further analysis is needed.



## Demographic Maps

**Map 1: October 2024 Service Change and Title VI Populations Route 13**







**Map 2: October 2024 Service Change and Title VI Population Route 77**

