



HAMPTON ROADS TRANSIT

# Title VI Program

2020-2023

TITLE VI OF THE CIVIL RIGHTS ACT OF 1964



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HAMPTON ROADS TRANSIT

PLANNING & DEVELOPMENT

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# Contents

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TITLE VI OF THE CIVIL RIGHTS ACT OF 1964 ..... 4

HAMPTON ROADS TRANSIT ..... 4

**CHAPTER 2: GENERAL REPORTING REQUIREMENTS .....9**

TITLE VI NOTICE TO THE PUBLIC..... 9

HRT TITLE VI COMPLAINT PROCEDURES AND FORM ..... 11

TITLE VI INVESTIGATIONS, COMPLAINTS AND LAWSUITS..... 15

PUBLIC PARTICIPATION PLAN..... 15

LIMITED ENGLISH PROFICIENCY (LEP) ..... 16

MEMBERSHIP OF NON-ELECTED COMMITTEES AND COUNCILS ..... 17

MONITORING OF SUBRECIPIENTS AND CONTRACTORS ..... 19

FIXED FACILITY IMPACT ANALYSIS..... 19

COMMISSION APPROVAL OF THE TITLE VI PROGRAM..... 20

**CHAPTER 3: SERVICE STANDARDS AND POLICIES .....22**

MAJOR SERVICE/FARE CHANGE POLICY ..... 22

DISPARATE AND DISPROPORTIONATE IMPACT..... 22

EQUITY ANALYSIS PROCEDURES..... 28

SERVICE STANDARDS..... 30

SERVICE POLICIES ..... 32

**CHAPTER 4: DEMOGRAPHIC AND SERVICE PROFILE MAPS AND CHARTS ..... 35**

POPULATION ETHNICITY CHARACTERISTICS ..... 35

INCOME CHARACTERISTICS..... 36

COMPOSITE MINORITY & LOW-INCOME CHARACTERISTICS ..... 39

ROUTING DEMOGRAPHIC CHARACTERISTICS ..... 40

DEMOGRAPHIC RIDERSHIP AND TRAVEL PATTERNS COLLECTED BY SURVEYS..... 40

**CHAPTER 5: SERVICE MONITORING.....42**

EQUITABLE SERVICE AND AMENITIES ..... 42

VEHICLE LOAD MONITORING ..... 47

ON-TIME PERFORMANCE REPORT\* ..... 47

SERVICE AVAILABILITY ANALYSIS..... 48

**CHAPTER 6: SERVICE AND FARE CHANGES ..... 50**

    MAJOR SERVICE CHANGES SINCE 2017 ..... 50

    FARE CHANGES SINCE 2017 ..... 50

**APPENDICES..... 52**

**APPENDIX A: PUBLIC PARTICIPATION PLAN ..... 54**

**HRT COMMITMENT TO PUBLIC INVOLVEMENT AND NON-DISCRIMINATION .... 57**

**THE PURPOSE OF THE PUBLIC PARTICIPATION PLAN ..... 59**

    PUBLIC PARTICIPATION PLAN GOALS ..... 59

    DEFINITIONS ..... 59

**HRT’S PUBLIC PARTICIPATION PROCESS ..... 63**

    PUBLIC INVOLVEMENT ON FARE AND SERVICE CHANGES ..... 64

    PUBLIC NOTICE ON PROGRAM OF PROJECTS ..... 64

    PUBLIC HEARINGS FOR COMPLIANCE WITH THE NATIONAL ENVIRONMENTAL POLICY ACT ..... 64

    PUBLIC NOTICE ON DBE PROGRAM AND GOALS ..... 65

**TARGET AUDIENCES ..... 66**

    HRT’S STAKEHOLDERS ..... 66

    LIMITED ENGLISH PROFICIENT CUSTOMERS ..... 67

**PUBLIC COMMUNICATION AND OUTREACH TOOLS ..... 69**

    CUSTOMER FEEDBACK ..... 70

    CUSTOMER ALERTS ..... 70

    PRINT AND ELECTRONIC MEDIA ..... 70

    PARTNERSHIPS WITH COMMUNITY-BASED ORGANIZATIONS ..... 70

    PARTICIPATION IN LOCAL COMMUNITY EVENTS ..... 71

    SCHOOL OUTREACH ..... 71

    TRANSIT RIDERS ADVISORY AND PARATRANSIT ADVISORY COMMITTEES ..... 71

    MEET & GREET/ OPEN HOUSE ..... 72

    SURVEYS ..... 72

    PUBLIC MEETINGS AND HEARINGS ..... 72

**APPENDIX B: LIMITED ENGLISH PROFICIENCY PLAN .....74**

**INTRODUCTION .....77**

    LEGAL AND REGULATORY CONTEXT.....77

    PURPOSE OF THIS DOCUMENT .....77

    LEP METHODOLOGY .....77

    DATA SOURCES.....78

**FOUR FACTOR ANALYSIS .....81**

    FACTOR 1: LEP POPULATION IDENTIFICATION.....81

    FACTOR 2: FREQUENCY WITH WHICH LEP INDIVIDUALS COME IN CONTACT WITH HRT PROGRAMS,  
    ACTIVITIES, OR SERVICES.....85

    FACTOR 3: EVALUATION OF IMPORTANCE OF HRT SERVICES TO THE LEP POPULATION .....85

    FACTOR 4: AVAILABLE RESOURCES AND COST OF LANGUAGE ASSISTANCE SERVICES.....85

**REFERENCES.....89**

**APPENDIX C: BOARD AND COMMITTEE MEMBERS .....91**

**APPENDIX D: COMMISSION RESOLUTION - TDCHR.....94**

**APPENDIX E: DETAILED VEHICLE ASSIGNMENT .....97**

**APPENDIX F: ROUTE MINORITY/LOW-INCOME STATUS .....101**

**APPENDIX G: VEHICLE LOAD ANALYSIS .....104**

**APPENDIX H: SERVICE CHANGE ANALYSES 2017-2019 .....106**

## CHAPTER 1: INTRODUCTION

### TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

The Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin. Section 601 of Title VI of the Civil Rights Act of 1964 states that "No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

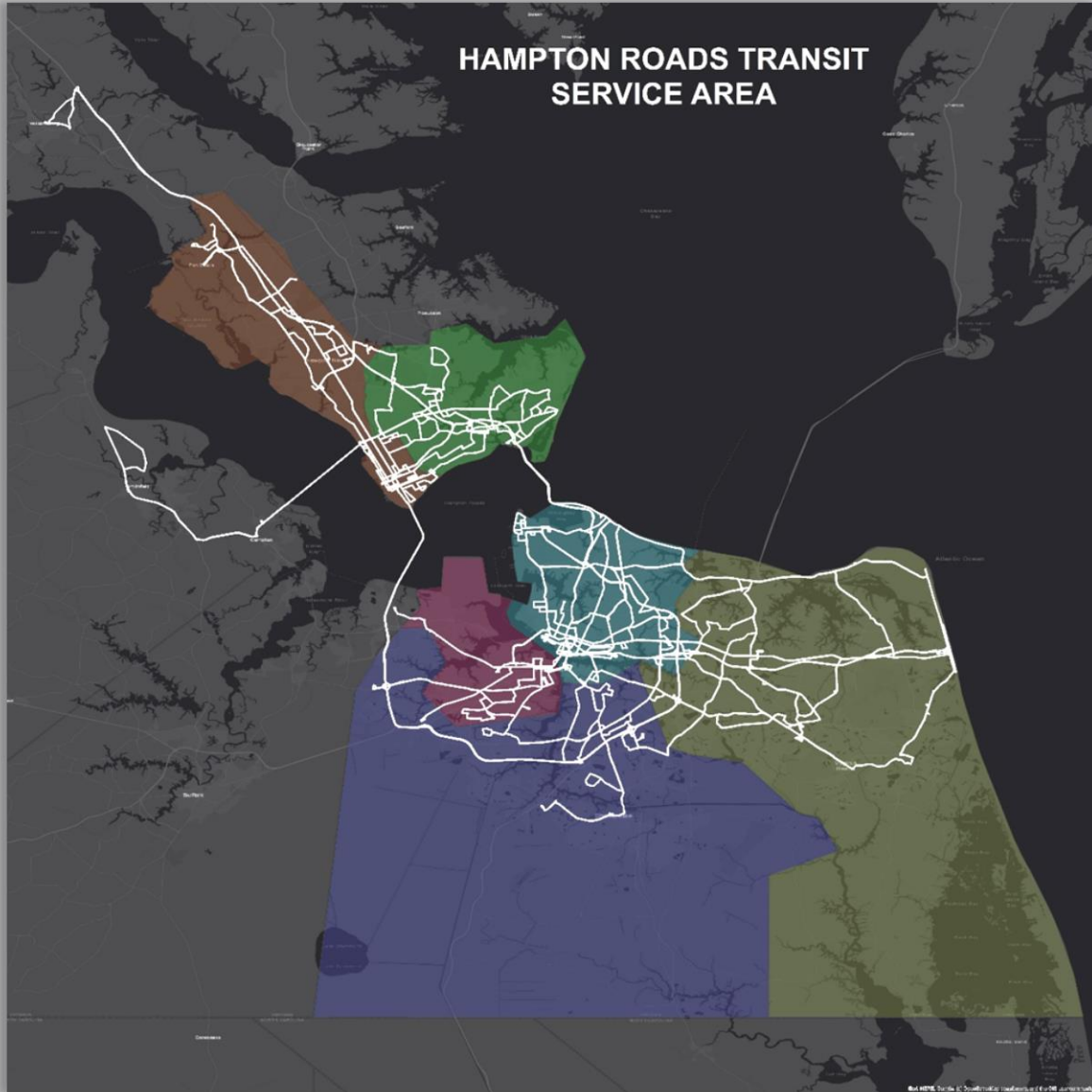
To achieve this purpose, each Federal department and agency which provides financial assistance for any program or activity is authorized and directed by U.S. Department of Justice (DOJ) to effectuate provisions of Title VI for each program or activity by issuing generally applicable rules, regulations, or requirements.

In this regard, it is the responsibility of applicants, recipients, and sub-recipients of Federal Transit Administration (FTA) assistance, to distribute transit services and related benefits in a manner consistent with Title VI. Title VI of the Civil Rights Act of 1964 requires recipients of federal assistance to monitor and evaluate federally assisted programs for compliance. The FTA is responsible for ensuring compliance of transit agencies receiving federal assistance. FTA Circular 4702.1B describes the monitoring methodology used by recipients. Transit providers must conduct periodic assessments to determine whether the transit service provided to minority communities and minority users is consistent with the objectives cited in this circular. Hampton Roads Transit receives federal assistance for the provision of public transit services and therefore complies with the Civil Rights Act of 1964 and the provision of Title VI.

### HAMPTON ROADS TRANSIT

The Transportation District Commission of Hampton Roads (Hampton Roads Transit or HRT) was established in 1999 to provide local and sub-regional fixed-route bus services for the Hampton Roads region. The primary communities served by HRT are Chesapeake, Hampton, Newport News, Norfolk, Portsmouth, and Virginia Beach. The service area provides HRT with over 13.3 million passenger trips from a diverse community of 1.34 million, of which 44.7% are designated as minorities (2018 American Community Survey (ACS)) and 19.3% are designated as low-income (150% of the federal poverty line with respect to household size as determined by the US Department of Health and Human Services) (2018 ACS).

FIGURE 1: HAMPTON ROADS TRANSIT SYSTEM MAP (AUGUST 2016)



## **FACILITIES**

Hampton Roads Transit operates from the following facilities located throughout its service area.

**TABLE 1: HRT TRANSIT FACILITIES**

<b>FACILITY</b>	<b>ADDRESS</b>
HRT Northside Bus Operations, Maintenance and Administration Facility	2400 Victoria Boulevard Hampton, VA 23661
HRT Southside Bus Operations, Maintenance and Administration Facility	509 E. 18 <sup>th</sup> Street Norfolk, VA 23504
Norfolk Tide Facility (light rail maintenance and operations)	1850 Brambleton Avenue Norfolk, VA 23504
Rail Operations (warehouse)	3404 Mangrove Avenue Norfolk, VA 23502
Downtown Norfolk Transit Center	434 St. Paul's Blvd Norfolk, VA 23510
Hampton Transit Center	2 West Pembroke Avenue Hampton, VA 23669
Newport News Transit Center	150 35 <sup>th</sup> Street Newport News, VA 23607
Silverleaf Transit Center	4300 Commuter Drive Virginia Beach, VA 23452
Wards Corner Transfer Center	7725 Granby Street Norfolk VA 23505
HRT Virginia Beach Operations Facility (seasonal trolley base)	1400 Parks Avenue Virginia Beach, VA 23451

## **SERVICES PROVIDED**

Hampton Roads Transit operates fixed-route local and express bus service, fixed guideway ferry and light rail service, paratransit bus service, and TRAFFIX (vanpool) service. All buses, ferries, and light rail vehicles are ADA accessible.

### **Local Fixed-Route Bus Service**

Approximately seventy local bus routes connect customers to work, school, retail, recreational opportunities, and other destinations. Fixed-route service is provided with 29-, 35-, and 40-foot buses. While service frequency, hours, and days vary by route, the bus system operates seven (7) days a week from 4:00 a.m. to 2:00 a.m. Fixed-route buses can accommodate up to two bicycles.



**MAX Express Bus Service**

The MAX is a regional express bus service traveling mostly along interstates and connecting some of the region's largest employers, including Naval Station Norfolk and Huntington Ingalls Shipyard in Newport News. MAX routes have limited stops for faster connections. MAX service operates on coach buses. Some MAX routes operate throughout the day; others are designed for commuter service, only operating during peak periods.

**Virginia Beach Wave Seasonal Bus Service**

The VB Wave is a seasonal fixed-route that serves residents and tourists of the Virginia Beach resort area. The VB Wave operates from May to October from 8:00 a.m. to 2:00 a.m. The VB Wave service operates with trolley vehicles.

**Peninsula Commuter Service**

The Peninsula Commuter Service provides five (5) fixed-route, limited stop, bus routes that connect major employment destinations, such as Canon and Huntington Ingalls Shipyard. These routes offer commuter service with only one or two trips per day, designed to coincide with shift changes at major employers.

**The Tide Light Rail**

The Tide extends 7.4 miles from Fort Norfolk and the Eastern Virginia Medical Center, through downtown Norfolk, east to Newtown Road at the border of Norfolk and Virginia Beach. There are 11 stations with single car platforms that are ADA accessible. In addition to four park-and-ride locations that offer free parking, customers connect to light rail by walking, biking, or riding one of 18 routes that offer direct connections to six stations. The Tide operates seven days a week: operating from 6:00 a.m. to 11:00 p.m. on Monday through Thursday, 6:00 a.m. to 12:00 a.m. on Friday and Saturday, and 10:55 a.m. to 9:00 p.m. on Sunday.

**Elizabeth River Ferry**

HRT operates three paddleboat ferries on the Elizabeth River that provide daily connections between downtown Norfolk and downtown Portsmouth. Ferry service is provided to Harbor Park baseball stadium between April and September. The ferry operates seven (7) days a week, provides peak and off-peak service, and offers a winter and summer schedule. In the winter, the ferry operates from 5:30 a.m. to 9:45 p.m. Monday through Thursday; 5:30 a.m. – 11:00 p.m. on Friday; 10:00 a.m. to 12:00 a.m. on Saturdays; and 10:00 a.m. to 10:00 p.m. on Sundays. Service hours during the summer schedule are extended to 11:45 p.m. Monday through Thursday and on Sunday.

**TRAFFIX**

TRAFFIX is a Transportation Demand Management program that is designed to decrease traffic congestion in Southeastern Virginia by offering commuters ways to reduce the number of Single Occupancy Vehicles (SOV's) commuting to work. The TRAFFIX program encourages the usage of HOV lanes through ridesharing (ex. vanpool) and by encouraging the usage of alternatives to driving such as public transportation, teleworking, biking, or walking to work.

**Paratransit**

HRT provides demand-response paratransit service for persons with disabilities. Paratransit service is offered to those eligible for service within  $\frac{3}{4}$  of a mile of any route during HRT's hours of operation.

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## CHAPTER 2: GENERAL REPORTING REQUIREMENTS

### TITLE VI NOTICE TO THE PUBLIC

The following notice is posted in all HRT administrative reception areas and transfer centers and is stated on the HRT website.

FIGURE 2: HRT TITLE VI NOTICE OF PUBLIC RIGHTS

## Notifying the Public of Rights under Title VI


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Hampton Roads Transit (HRT) operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes he or she has been subjected to discrimination prohibited under Title VI may file a complaint with HRT.

For more information on HRT's civil rights program and the procedures to file a complaint, call 757.222.6000; online at [www.gohrt.com](http://www.gohrt.com) and click "Contact"; or visit our administrative offices at 509 E. 18th Street, Building #4, Norfolk, VA 23504 or 3400 Victoria Boulevard, Hampton, VA 23661.

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, **Attn: Complaint Team, East Building, 5th Floor – TCR, 1200 New Jersey Ave. SE, Washington, DC 20590.**

If information is needed in another language, contact 757-222-6000.  
Para más información en español, por favor llame 757-222-6000.



HAMPTON ROADS  
TRANSIT

[gohrt.com](http://gohrt.com)

The following text is printed on all route and system maps. Route maps are provided on all transit vehicles. System maps and route maps are provided at all administration buildings and transfer centers. Additionally, these maps are placed in over 90 locations throughout our service district.

***Title VI of the Civil Rights Act of 1964***

Prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Hampton Roads Transit is committed to a program of non-discrimination in the conduct of its business and in the delivery of equitable and accessible transportation services. For more information on HRT's policy on Title VI of the Civil Rights Act of 1964, visit our web site <http://gohrt.com> and click on "Contact".

If information is needed in another language, contact 757-222-6000. Para más información en español, por favor llame 757-222-6000.

## HRT TITLE VI COMPLAINT PROCEDURES AND FORM

The complaint form shown in Figure 3 is available for download on the HRT website. It is also available upon request through Customer Service, by e-mail, and in print through direct mail.

### TITLE VI COMPLAINT PROCESS

1. Purpose

These procedures cover all complaints under Title VI of the Civil Rights Act of 1964, Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations” (1994), and Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” (2000), for alleged discrimination in any program or activity administered by Hampton Roads Transit.

2. Statement of Policy

No person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any Hampton Roads Transit program or activity, as provided by Title VI of the Civil Rights act of 1964, and as amended.

3. How to File a Complaint

- a. Any person who believes he or she has been discriminated against on the basis of race, color, or national origin by Hampton Roads Transit (hereinafter referred to as “HRT”) may file a Title VI complaint by completing and submitting the agency’s Title VI Complaint Form.
  - i. All complaints must be in written form.
  - ii. A complaint submitted by mail must be addressed as follows:  
Hampton Roads Transit  
Attention: Title VI Coordinator  
3400 Victoria Boulevard  
Hampton, VA 23661
  - iii. A complaint can be submitted through the HRT website at <http://gohrt.com/contact/title-vi-program/title-vi-complaint-form/>
  - iv. A complaint submitted on HRT’s Title VI Complaint Form can be emailed to [TitleVI@hrtransit.org](mailto:TitleVI@hrtransit.org);  
Subject: Title VI Complaint
- b. A copy of the Agency’s Title VI Complaint Form may be obtained as follows:
  - i. Website at <http://gohrt.com/contact/title-vi-program/>
  - ii. Phone: Call (757) 222-6000 and ask to speak with Customer Service who will email or mail a copy of the Form.
- c. Complaints must be received within 180 days from the date of the alleged incident and must be complete and provide the requested information.
- d. A Title VI complaint may also be filed directly with the Federal Transit Administration. The Complaint Form may be found at <https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/fta-civil-rights-complaint-form>. The complaint form must be signed and mailed to:

Federal Transit Administration  
Office of Civil Rights  
Attention: Complaint Team

East Building, 5<sup>th</sup> Floor – TCR  
1200 New Jersey Avenue SE  
Washington, DC 20590


4. How HRT will Respond to Complaints

The following is a summary of the procedures that HRT uses for investigation and resolution of Title VI customer complaints.

- a. Once a Title VI complaint is received, HRT will review the complaint to determine if our office has jurisdiction. The complainant will receive an acknowledgment letter informing her/him whether the complaint will be investigated by our office or a letter closing the matter.
- b. HRT has 90 days to investigate the complaint from the date that it was received by HRT. If more information is needed to resolve the case, HRT may contact the complainant for a meeting, interview or additional information. The complainant has 30 calendar days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 30 calendar days, HRT can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.
- c. After the investigator reviews the complaint, he/she will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident and explains how the situation will be addressed. If the complainant wishes to appeal the decision, he/she has 90 days after the date of the letter or the LOF to do so.

FIGURE 3: TITLE VI COMPLAINT FORM

## Title VI Program Complaint Form



Title VI of the Civil Rights Act of 1964 states "No person in the United States shall, on the grounds of race, color, or national origin, be excluded from, participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal assistance.

---

1. Today's Date: \_\_\_\_\_
2. Complainant's Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City, State, Zip Code: \_\_\_\_\_  
Telephone No(s): (\_\_\_\_) \_\_\_\_\_ / (\_\_\_\_) \_\_\_\_\_  
E-Mail Address: \_\_\_\_\_
3. Person discriminated against (if someone other than Complainant):  
Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City, State, Zip Code: \_\_\_\_\_  
Telephone No(s): (\_\_\_\_) \_\_\_\_\_ / (\_\_\_\_) \_\_\_\_\_
4. What was the discrimination complaint based on? (check all that apply):  
 Race       Color       National Origin
5. Date of alleged incident resulting in discrimination: \_\_\_\_\_
6. Describe the alleged discrimination. Explain what happened and who was responsible? If more space is needed, attach any written materials or other information that you believe supports your complaint on an additional sheet of paper.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
7. Where did the incident take place? Provide location, bus number, HRT employee name, etc.  
\_\_\_\_\_  
\_\_\_\_\_

8. Witness(es) (if applicable). Please provide their contact information.

Witness Name: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_

Telephone No.(s): \_\_\_\_\_

Witness Name: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_

Telephone No.(s): (\_\_\_\_) \_\_\_\_\_ / (\_\_\_\_) \_\_\_\_\_

9. Did you file this complaint with any other federal, state, or local agency or with a Federal or State court (check the appropriate space)?

Yes  No

If yes, check all that apply:

Federal agency  Federal court  State agency  State court  Local agency

10. Please provide contact information the agency/court where the complaint was filed.

Agency: \_\_\_\_\_

Name/Title: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_

E-Mail Address: \_\_\_\_\_

Telephone No: \_\_\_\_\_

11. If you need any special accommodations for communication regarding this complaint, please specify which alternative format you require.

Large Print (specify size): \_\_\_\_\_  TDD  Audio  Other: \_\_\_\_\_

Signature and date required below.

Signature \_\_\_\_\_ Date \_\_\_\_\_

Print or Type Name \_\_\_\_\_

If you feel that you have been discriminated against, a formal complaint may be filed with HRT'S Title VI Compliance Officer within 180 days after the date of the alleged discrimination. These procedures do not deny you the right to file formal complaints with other state or federal agencies. Once completed, please mail or deliver the completed and signed form to:

Hampton Roads Transit  
Attention: Title VI Compliance Officer  
3400 Victoria Boulevard  
Hampton, VA 23661  
757-222-6000



## TITLE VI INVESTIGATIONS, COMPLAINTS AND LAWSUITS

Since the submission of its 2017 Title VI Program, Hampton Roads Transit has had no lawsuits or any active Title VI investigations conducted by FTA or entities other than FTA. During this period (April 2017 – December 2019), HRT has received 1 formal complaint alleging Title VI violations. Of the 1 reported complaint alleging Title VI violations, none were substantiated. The following list summarizes the complaint.

**TABLE 2: LIST OF SUBMITTED TITLE VI FORMAL COMPLAINTS**

Comment Number	Created On	Complaint Description Summary	Summary of Review, Resolution, Action Taken	Status
2019-01	6/7/2019	Complaint of discrimination against a bus operator by passenger who self-identified as an African American Muslim. Passenger stated that he and the Operator exchanged words regarding the bus departure time; the passenger stated that the Operator responded to him in a sarcastic tone and did not provide a clear answer. The driver got up from his seat, walked off the bus over to the terminal, and returned with a security officer who came on the bus. The Officer stated that the passenger was being removed because the driver told the officer that he (operator) did not feel safe with the passenger on the bus. The passenger stated he did not do anything to warrant being removed from bus, The passenger stated that he had his full Muslim garb on in preparation to go to an Islamic service. The passenger stated that he believed that the bus driver must be a racist or did not like Muslims.	Based on the review process, HRT has determined there is no evidence to demonstrate that there is no evidence to demonstrate that HRT staff acted in a discriminatory manner. The complainant was interviewed by the Title VI Compliance Officer and all related information was documented regarding the outcome of no finding.	Closed

## PUBLIC PARTICIPATION PLAN

The public, as the primary customer and beneficiary of transit service, is provided the opportunity for input and review through the public engagement process. Actions such as the establishment of new service, fare adjustments, major modifications of existing service, and/or suspension or abandonment of any bus routes may include a formal process of review by HRT; including, meaningful public engagement conducted by HRT staff. Under 49 USC Chapter 53, Section 5307, the Federal Transit Administration (FTA) requires “a locally developed process to consider public comment before raising a fare or carrying out a major reduction in transportation service.” HRT uses a broad range of outreach tools documented in the Public Participation Plan (Appendix A) to serve this requirement.

Meaningful public engagement may include public meetings, public hearings, pop-up meetings, interactive web-based tools, distribution of written materials at major transfer points, posting of informational flyers, and the posting of information on the HRT website. Notices (signs, pamphlets, brochures) describing proposed action(s), date(s) and location(s) of any hearings or meetings may be posted on buses and at transfer centers. Notices may be published in major local and/or relevant neighborhood newspapers and on the HRT website. HRT also uses social media (ex. Facebook posts, Twitter) and HRT website comment forms to provide access through the internet. Open public meetings and formal public hearings are used to gain public review and comment. Community organizations, public agencies and elected officials may be notified by mail (direct and/or electronic) of significant service changes. All public comments submitted to HRT through any of these outreach tools become part of the official record.

Hampton Roads Transit communicates with many organizations throughout the region and often attends meetings and events sponsored by these groups. These groups consist of cultural organizations, senior organizations, city partners, schools, business associations and other organizations invested in HRT’s service

area. In this arena, we are able to create relevant conversations and dialogue between Hampton Roads Transit and the specific community regarding transit needs.

If a special accommodation is desired at any public meeting held by HRT, the public can call HRT Customer Service a minimum of two (2) business days prior to the meeting to arrange the proper accommodations. HRT will provide Spanish translation and offers interpreters for other languages, including sign language, upon request and following the same time period of special accommodation requests (a minimum of two (2) business days). Hampton Roads Transit selects meeting and hearing locations to provide reasonable accommodations in accordance with the Americans with Disabilities Act of 1990. Hampton Roads Transit public meetings are wheelchair accessible.

Besides actions defined as a fare change or a major reduction in service, Hampton Roads Transit has established that changes in service will be the subject of public hearings, meetings, or other reasonable use of meaningful public outreach or engagement methods as appropriate to the nature of the proposed change. Public input is solicited while proposals are under consideration. Customers and the public are notified prior to the implementation of changes in service.

## LIMITED ENGLISH PROFICIENCY (LEP)

HRT's Limited English Proficiency (LEP) Plan, or LEPP, for this Title VI Program is attached in Appendix B: The LEPP documents the four-factor analysis completed to identify appropriate language assistance measures needed to improve access to HRT services and benefits for LEP persons. Under the analysis, it was determined that approximately 3% of the population in HRT's service area has limited proficiency in the English language. The most predominate language spoken other than English is Spanish. The LEPP documents current measures used by HRT to assist LEP populations including:

- HRT's current Customer Service Call Center Translation Services that provide translation services on a per-call basis.

HRT's Customer Service department reported that it received 10 calls from LEP speakers requiring translation services in 2017, 12 calls in 2018, and 35 calls in 2019. HRT will ensure that a Spanish language translator is available at public hearings upon a request for services. Within the 2017-2020 Title VI review period, HRT has not needed to utilize these services for a public hearing. HRT has received no request for any other translation services during the 2017-2020 review period for public meetings.

As part of the four-factor analysis, the factor 1 analysis showed that 3.08 percent of the population in HRT's service area can be classified as limited English proficiency, reporting that they speak English less than very well. The factor 2 analysis showed that the frequency of contact with HRT's customer service center was limited. However, with those contacts HRT ensures that all persons, regardless of language proficiency, have access to information on public transportation services and programs. This level of service is an important element of the agency's customer service and operating program. HRT currently offers translation services to those who call into their customer service line through contracted translation services. HRT utilizes Google Translate for translation on its website.

HRT paratransit service is operated by Via Transportation (“Via”). If their call center receives a call from a non-English speaking customer, they have bi-lingual personnel who will either speak with the person directly at that time or the person will be called back. If the Via assigned staff is not available, Via Transportation can contact their Call Center in Parcelona, Spain for assistance, where they have 24 hours/day coverage. For customers seeking Spanish translation, Via agents will forward the call to (757) 222-6100 (Press 2) to ensure that the customer receives bilingual support.

## MEMBERSHIP OF NON-ELECTED COMMITTEES AND COUNCILS

The Transportation District Commission of Hampton Roads, HRT’s governing body referred to as the Commission or the Board, consists of 13 members, one elected official and one citizen representative from each city served by Hampton Roads Transit, and the chairman of the Commonwealth Transportation Board (CTB) or a designee. Citizen representatives are appointed by the Governor.

The Chairman designates Commission members to sit on the following Standing Committees: Audit/Budget Review Committee, Operations and Oversight Committee, and the Planning and New Starts Development Committee.

The Board appoints non-Board members to the following advisory committees: Transit Riders Advisory Committee (TRAC), and Paratransit Advisory Committee (PAC).

The full list of Board members and Committee members is provided in Appendix C which also indicates the minority representation on the Board and the Committees.

### **STANDING COMMITTEES**

#### **Audit/Budget Review Committee**

The Audit/Budget Review Committee reviews financial statements and performance reports concerning actual expenses and revenues relative to the annual budget on a quarterly basis. It refers those reports to the full Commission.

#### **Management/Financial Advisory Committee**

The Management/Financial Advisory Committee (MFAC) serves as liaison between HRT staff and the City Managers of the component governments. The MFAC serves as an advisory body to make general or specific recommendations to the Commission.

#### **Operations and Oversight Committee**

The Operations & Oversight Committee works with the President and CEO to consider proposals from HRT staff on the acquisition of goods and services. It also receives staff reports on system performance. The committee meets the second Thursday of each month, with the exceptions of November and December when it meets the first Thursday of the month.

### **Planning and New Starts Development Committee**

The Planning and New Starts Development Committee works with the President and CEO to provide policy and direction for HRT's major initiatives. The committee meets on an ad-hoc basis.

## **ADVISORY COMMITTEES**

### **Transit Riders Advisory Committee**

The Transit Riders Advisory Committee (TRAC) is a subcommittee under the Transportation District Commission of Hampton Roads (TDCHR) Executive Committee and is operated by citizens on a voluntary basis. The purpose of TRAC is to:

- Provide HRT administration with feedback and recommendations for improving operational or service issues affecting HRT customers
- Provide input into HRT's customer outreach activities
- Provide HRT customers and the community at-large with information about HRT services and soliciting input concerning service improvements

Members should include (but are not limited to) HRT customers and persons who currently utilize or have the desire to utilize public transportation. Members are appointed by the TDCHR Executive Committee Chairperson upon recommendation by HRT staff and/or the Commissioner(s) of the represented city.

The TRAC reports to the TDCHR Executive Committee at each regularly scheduled meeting. A written report is prepared by the Recording Secretary and reviewed by the committee Chairperson and/or Vice-Chairperson and HRT staff to be submitted to the TDCHR Executive Committee Chairperson prior to presentation to the full TDCHR Commission meeting. HRT staff provides assistance as required to ensure that the report is prepared and placed on the TDCHR Executive Committee and TDCHR agendas. The TRAC was established by the TDCHR in July 2009.

### **Paratransit Advisory Committee**

The Paratransit Advisory Committee (PAC) is a subcommittee that is operated by citizens on a voluntary basis. The committee provides a communication link between the TDCHR, persons with disabilities who use or may use its services, and service providers to the disabled community on matters related to paratransit service within HRT's service area.

Membership shall consist of no more than twenty-one voting members and the non-voting members. Furthermore, membership shall generally consist of:

- Two consumers from each member jurisdiction
- One service provider representative from each member jurisdiction.

Every effort will be made to have equal representation from each jurisdiction and balanced representation of the various disabilities present in the member jurisdictions. If the above-referenced number of consumers and/or service providers is not available from a jurisdiction, the Commission may, and shall be encouraged to, appoint a representative from another jurisdiction.

The PAC reports to the TDCHR Executive Committee at each regular meeting. A written report is prepared by the Recording Secretary and reviewed by the committee Chairperson and/or Vice-Chairperson and HRT staff to be submitted to the TDCHR Executive Committee Chairperson prior to presentation to the full TDCHR Commission meeting. HRT staff provides assistance as required to ensure that the report is prepared and placed on the TDCHR Executive Committee and TDCHR agendas. The PAC was established by the TDCHR in 2002.

## MONITORING OF SUBRECIPIENTS AND CONTRACTORS

As of Commission Adoption of this Title VI Program, there is no sub-recipient of federal funds through Hampton Roads Transit.

With the adoption of this Title VI Program, HRT requires all subrecipients to be fully compliant with FTA Circular 4702.1B, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*. HRT will monitor compliance through the submittal of Title VI Assurance Forms and Title VI Programs as follows:

- All subrecipients must submit their Title VI Assurance Form and Board-approved (if applicable) Title VI Program to HRT prior to the receipt of any federal funds.
- Subrecipients must submit updated Title VI program including any public transportation-related Title VI investigations, complaints, or lawsuits:
  - Prior to first receipt of federal funds for each grant cycle, and
  - Prior to final receipt of federal funds for final grant cycle.
- Lack of compliance with the Title VI program or the submittal schedule will delay or halt disbursement of federal funds.
- HRT and Subrecipients will follow compliance reviews as set forth under FTA C 4702.1B, Chapter 8.

Currently, Hampton Roads Transit contracts out portions of their service to two companies:

- Norfolk By Boat operates the Elizabeth River Ferry, a ferry services that connects downtown Norfolk and Portsmouth across the Elizabeth River.
- Via Transportation operates HRT's federally mandated complementary paratransit service. Paratransit service is available to qualified disabled residents in the HRT service area.

As part of its efforts to ensure that Norfolk By Boat and Via Transportation comply with the requirements of Title VI, Hampton Roads Transit will hold periodic meetings with representatives of the above companies to discuss any Title VI issues that arise. Hampton Roads Transit staff has briefed them on their Title VI obligations and provided them with copies of the most recent Title VI Circular. The two companies have agreed to abide by the Title VI requirements.

## FIXED FACILITY IMPACT ANALYSIS

HRT may not select the site or location of facilities with the purpose or effect of excluding persons from, denying the benefits of, or subjecting them to discrimination on the basis of race, color, national origin, or income level. The location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, national origin, or income-level.

Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, and operations centers. Bus shelters are not included in this provision as they are considered transit amenities and are covered by regulations discussed in Section 3.5 of this Title VI Program. Transit stations, power substations, and similar facilities are not included in this provision as they are evaluated during project development and the NEPA process.

For facilities covered by this provision, HRT is required to:

- Complete a Title VI equity analysis during the planning stage with regard to where a project is located to ensure the location is selected without regard to race, color, national origin, or income and engage in outreach to persons potentially impacted by siting of facilities. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.
- Give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure proper analysis of localized impacts.
- Provide substantial legitimate justification for locating a project in a location that will result in a disparate impact on the basis of race, color, or national origin or disproportionate impact on the basis of income, and show that there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin or disproportionate impact on the basis of income. In order to show that both tests have been met, HRT must consider and analyze reasonable, feasible, and prudent alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin or disproportionate impact on the basis of income, and then implement the least discriminatory alternative.
- Under HRT's Title VI program, all Title VI equity analyses for proposed service and fare changes and siting of fixed facilities will be considered by the Board prior to implementation. Evidence of consideration and approval will be documented through the meeting minutes of the Commission or through Resolution and will be attached to each final Title VI equity analysis report.

## COMMISSION APPROVAL OF THE TITLE VI PROGRAM

This Title VI Program, which includes the disparate impact policy, major service change policy, service and fare change equity analysis procedures, and service monitoring, was considered and approved by HRT's governing board on March 27, 2020 as evidenced by the passing of Resolution 01 – 2017 – Title VI Program (Appendix D).

Under HRT's Title VI program, all Title VI equity analyses for proposed service and fare changes and siting of fixed facilities will be considered and approved by the Board prior to implementation. Evidence of consideration and approval will be documented through the meeting minutes of the Commission or through Resolution and will be attached to each final Title VI equity analysis report.

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## CHAPTER 3: SERVICE STANDARDS AND POLICIES

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### MAJOR SERVICE/FARE CHANGE POLICY

Recommendations for service changes are developed by HRT staff to maintain efficient service. The HRT key performance measure for proposed service changes is based on passengers per trip. When a route ridership falls at or below an average of 10 passengers per trip, it is considered an “under performer” and is subject to a detailed review to improve its performance and may be recommended for elimination. In accordance with industry-standard practice, HRT will consider a percentage change of 25% hours or mileage for a route a “Major Service Change.” All proposed Major Service Changes require a Title VI Equity Analysis under the procedures established by this Title VI program. The performance of the referenced analysis would include a 25% percentage change by service and/or day type.

HRT will consider a percentage change of 50% of route miles or hours for Express Service (ex. MAX) a “Major Service Change,” irrespective of day type.

As stated in the Equity Analysis Procedures, if a disparate equity impact is determined and HRT chooses not to alter the proposed service or fare change despite the potential disparate impact on minority populations or disproportionate impact on low-income populations, or if HRT finds, even after the revisions, that minority or low-income riders will continue to bear a disproportionate share of the proposed service change, HRT may implement the service change if; HRT has a substantial legitimate justification for the proposed service change, and HRT can show that there are no reasonable alternatives that would have a less disparate impact on minority or low income riders but would still accomplish the transit provider’s legitimate program goals.

Under the HRT Fare Policy at the time of adoption of this Title VI Program, HRT has a farebox recovery ratio target between 22 and 25%. HRT staff annually reviews and reports the farebox recovery ratio compared to the target. Based on the analysis, HRT may recommend fare adjustments as part of a range of solutions to maintain a sustainable long-term Financial Plan for the agency. All proposed Fare Changes require a Title VI Equity Analysis under the procedures established by this Title VI program.

### DISPARATE AND DISPROPORTIONATE IMPACT

For any proposed change that requires an equity analysis as defined in Section 3.1, HRT will determine if the change would create a disparate or disproportionate impact minority and/or low-income populations, respectively.

Determination of whether a proposed Major Service Change has either disparate or disproportionate impact is based on whether the percentage of minority and/or low-income passengers on an affected transit route (bus or fixed-guideway) is greater than five (5) percentage points of the transit system’s percentage of minority and/or low-income riders.

Determination of whether a proposed fare adjustment has either disparate or disproportionate impacts is based on minority and/or low-income populations bearing a fare rate change of greater than five (5) percentage points as compared to non-minority and/or non-low-income populations.



## **PUBLIC OUTREACH**

In developing the updated HRT Title VI Program HRT engaged in public outreach activities to request public review and comment from February 17, 2020 to March 24, 2020. No public comment was received by mail, e-mail, through HRT's website, or by phone.

An 8-1/2 by 11 notice (shown on the following page) was posted in all major Customer Service Areas including:

- HRT Northside Bus Operations, Maintenance and Administration Facility
- HRT Southside Bus Operations, Maintenance and Administration Facility
- Silverleaf Transit Center
- Hampton Transit Center
- Newport News Transit Center

A tri-fold pamphlet was created with a summary of information on the changes to the HRT Title VI Policy. The pamphlet directly and clearly asked for public comment on the policy. The draft Title VI policy was posted on gohrt.com under the Title VI section of the website. Staff distributed pamphlets to customers at the following locations:

- Newport News Transit Center
- Downtown Norfolk Transfer Center
- Hampton Transit Center
- Silverleaf Transit Center
- Robert Hall Transfer Center
- Pembroke Transfer Center

FIGURE 4: HRT TITLE VI POLICY UPDATE NOTICE FOR PUBLIC COMMENT

# Notice of Update HRT's Title VI Policy Under the Civil Rights Act of 1964

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## What is Title VI of the Civil Rights Act of 1964?

Title VI of the Civil Rights Act of 1964 states that, "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

The Federal Transit Administration (FTA) issued guidance that helps recipients of FTA grant funding better understand and comply with federal civil rights requirements and to: ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner; promote full and fair participation in public transportation decision-making without regard to race, color, or national origin; to ensure meaningful access to transit-related programs and activities by persons with limited English proficiency. HRT is required to update its Title VI Policy by March 31, 2020.

## HRT's Title VI Policy

Hampton Roads Transit's Title VI Program and Policy includes policy, reports, data, procedures, and plans that ensure that HRT is in compliance with the requirements in Title VI of the Civil Rights Act of 1964. HRT's existing Title VI Program also evaluates potential impacts of proposed service and fare changes on minority and low-income riders and provides the provision of language access to persons with limited English proficiency. HRT completes Title VI assessments when proposing a major service change or when proposing changes in the fare structure that could provide a disparate impact and/or disproportionate burden on Title VI populations. HRT's Title VI Program includes an update of related population, data, statistics and mapping for Title VI populations, public involvement and service standards and policies.


## Public Comments on HRT's Title VI Program

HRT's revised Title VI Policy is available for review and public comment on our website - <http://gohrt.com/contact/title-vi-program/>

All comments must be received no later than **March 24, 2020**.

Your feedback is very important and will allow us to continue to serve all of our transit populations. Comments can be submitted by email at [TitleVI@hrttransit.org](mailto:TitleVI@hrttransit.org) or by calling 757-222-8000 and asking to speak with the Title VI Coordinator, Jennifer Dove. Comments can also be mailed to Hampton Roads Transit, Attn: Title VI Coordinator, 3400 Victoria Blvd., Hampton, VA 23661.

Para más información en español, por favor llame 757-222-8000.




  
HAMPTON ROADS  
TRANSIT  
gohrt.com

FIGURE 5: HRT TITLE VI POLICY UPDATE NOTICE FOR PUBLIC COMMENT – PAMPHLET

[Pamphlet Exterior](#)

## CONTACT

Phone: 757-222-6000

**Northside Bus Operations, Maintenance and Administration Facility**  
3400 Victoria Boulevard  
Hampton, VA 23661


**Southside Bus Operations, Maintenance and Administration Facility**  
509 E. 18th Street  
Norfolk, VA 23504

## YOUR FEEDBACK IS IMPORTANT.

Comments can be submitted by:  
**Email:** [TitleVI@hrtransit.org](mailto:TitleVI@hrtransit.org)  
**Mail:** 3400 Victoria Blvd.,  
Hampton, VA 23661

**Phone:** 757-222-6000  
Request to speak to the Title VI Coordinator,  
Jennifer Dove



A copy of the draft report can be reviewed on  
Hampton Roads Transit's website at:  
<http://gohrt.com/contact/title-vi-program>



HAMPTON ROADS TRANSIT  
**gohrt.com**

## NOTICE OF PROGRAM UPDATE

Hampton Roads Transit  
**Title VI Policy**  
Under the Civil Rights Act of 1964



## Summary of updates and modifications of Hampton Roads Transit's Title VI Program

A summary/highlights of some of the program updates, changes, and modifications are included below. Additional information and detail on HRT's complete 2020 Title VI Program; including all updates and content is provided in the full Title VI Program Draft. Details and the draft of 2020 Title VI Program can be viewed on Hampton Roads Transit's website at <http://gohrt.com/contact/title-vi-program>



Hampton Road's Transit is required to update its Title VI Policy by March 31, 2020.

### Title VI Program – General

- Update of related population data, statistics, and mapping for minority, low-income, and LEP populations.
- Update of program material, notices, and related information.

### Chapter 3: Service Standards and Policies

- Update of evaluation criteria for max service

## What is Title VI of the Civil Rights Act of 1964?

Title VI of the Civil Rights Act of 1964 states that, "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

The Federal Transit Administration (FTA) issued guidance (effective October 1, 2012) that helps recipients of FTA funding better understand and comply with federal civil rights requirements and to; ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner; promote full and fair participation in public transportation decision-making without regard to race, color, or national origin; to ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

## Hampton Roads Transit's Title VI Policy

Hampton Roads Transit's Title VI Program and Policy includes policy, reports, data, procedures, and plans that ensure that HRT is in compliance with the requirements in Title VI of the Civil Rights Act of 1964. HRT's existing Title VI Program also evaluates potential impacts of proposed service and fare changes on minority and low-income riders and provides the provision of language access to persons with limited English proficiency. HRT completes Title VI assessments when proposing major service change or when proposing changes in the fare structure that could provide a disparate impact and/or disproportionate burden on Title VI populations.





# EQUITY ANALYSIS PROCEDURES

## SERVICE CHANGE ANALYSIS PROCEDURE

The process for analyzing service changes generally follows the following ten (10) steps:

1. Define the Service Area covered by HRT system.

Identify Transportation Analysis Zones (TAZ) or Census tracts in the service area that are predominantly minority and predominantly low-income using FTA's recommended procedures specified in Circular 4702.1B. Determine the percentage of minorities and low-income populations residing in the service area. Generate maps showing the geographic distribution of minority and low-income populations.

Identify the type of service change proposed for each transit route, along with the percentage change between existing conditions and future conditions. It is only necessary to analyze those routes for which changes are proposed. Apply the threshold for a Major Service Change to determine whether the percentage change between existing and future conditions is above or below the threshold, and whether any of the proposed changes constitute the designation of a Major Service Change.

After identifying the type of service change proposed and whether or not the service change(s) will be classified as Major Service Changes, HRT will consider the proposed change in the context of existing data. That data will include travel pattern data from HRT's Origin-Destination surveys for the affected route(s) and the Census demographic data previously obtained.

- a. For changes to existing transit routes involving service frequencies, reductions in revenue service miles, or other modifications in route length, HRT will review the change based on data from HRT's Origin-Destination survey.
- b. For changes involving route extensions to serve new geographic areas or the addition of new routes, HRT will consider Census geographic data to establish a market capture area for the proposed new service area.

Based on the type of service change (reduced service frequency, route restructuring, route modification etc.), determine the percentage of minorities and/or low-income populations that would be affected by the proposed service change. In cases where a service frequency change is proposed, or a route is modified such that there is a reduction in service level or geographic area covered, the analysis should use data obtained from the HRT origin-destination survey of existing riders along the route affected by the change, as these populations will be most affected by the proposed change. Conversely, if a route is proposed to be extended to serve a new geographic area, HRT will use Census data as the geographic base for identifying minority and/or low-income populations residing within the specified distance of the route (market capture area).

Compare the percentage of minorities and/or low-income populations computed in Step 5 with the minority and/or low-income population percentage for the service area (along the route/affected area) determined in Step 2.

If the minority population percentage in Step 6 is greater than the service area minority population percentage by five (5) percentage points or more, and the proposed service change is identified as a

Major Service Change, a disparate equity impact is determined. If the low-income population percentage in Step 6 is greater than the service area low-income population percentage by five (5) percentage points or more, and the proposed service change is identified as a Major Service Change, a disproportionate equity impact is determined. In these cases, an appropriate mitigation plan should be developed by HRT to address the equity impacts identified. Again, only those service changes that are deemed Major Service Changes need to be evaluated for equity. If the minority or low-income population percentages are below the impact threshold of 5 points above the service area population percentages, no adverse equity impacts are determined.

HRT will present the proposed service change and results of the equity analysis for meaningful public involvement as defined by the public participation plan.

If a disparate equity impact is determined and HRT chooses not to alter the proposed service change despite the potential disparate impact on minority populations or disproportionate impact on low-income populations, or if HRT finds, even after the revisions, that minority or low-income riders will continue to bear a disproportionate share of the proposed service change, HRT may implement the service change only if:

- HRT has a substantial legitimate justification for the proposed service change, and
- HRT can show that there are no alternatives that would have a less disparate impact on minority or low income riders but would still accomplish the transit provider's legitimate program goals.

HRT Board will fully consider the results of the equity analysis, proposed alternatives and mitigation if applicable, and public comments on the proposed change prior to approval.

## **FARE IMPACT ANALYSIS PROCEDURE**

The process for analyzing fare adjustments generally follows the following nine (9) steps:

1. Define the Service Area covered by HRT system.

Identify TAZs or Census tracts in the service area that are predominantly minority and predominantly low-income using FTA's procedures. Using Census data, compute percent of minorities and low-income population in the Service Area. Generate maps showing the geographic distribution of minority and low-income populations.

Using travel pattern data obtained from Origin-Destination survey and the current fare structure, estimate average fares paid by minorities, non-minorities, low-income and non-low income riders in the entire Service Area. Further, break down the average fares by fare type.

Repeat Step 3 by replacing the current fare structure by the proposed fare structure.

Determine percent increase in fares for minorities, non-minorities, low-income and non-low-income populations in the Service Area.

If the percent differences in fare increase for minorities versus non-minorities and low-income versus non-low income populations are under the 5% impact threshold, a determination of "no impacts" will be made. If the estimated differences exceed HRT's 5% impact thresholds, it will be concluded that the proposed fare change would result in adverse equity impacts. In that case, appropriate mitigation plan will be developed by HRT to address those equity impacts.

HRT will present the proposed fare change and results of the equity analysis for meaningful public involvement as defined by the public participation plan.

If a disparate equity impact is determined and HRT chooses not to alter the proposed fare change despite the potential disparate impact on minority populations or disproportionate impact on low-income populations, or if HRT finds, even after the revisions, that minority or low-income riders will continue to bear a disproportionate share of the proposed fare change, HRT may implement the fare change only if:

- HRT has a substantial legitimate justification for the proposed fare change, and
- HRT can show that there are no alternatives that would have a less disparate impact on minority or low income riders but would still accomplish the transit provider’s legitimate program goals.

HRT Board will fully consider the results of the equity analysis, proposed alternatives and mitigation if applicable, and public comments on the proposed change prior to approval.

## SERVICE STANDARDS

### VEHICLE LOAD

The number of passengers, or load, carried per hour measures the efficiency of service. HRT’s system-wide efficiency goal for buses is 10 passengers or more per trip. The Load Factor, measured as a percent of a fully seated load, varies with service type. Load Factors for individual service types are shown in the following table.

TABLE 3: LOAD FACTORS BY SERVICE TYPES

SERVICE TYPE	PEAK	OFF-PEAK
<b>Regional Backbone</b>	120%	100%
<b>Local Priority</b>	120%	100%
<b>Coverage</b>	120%	100%
<b>Limited/Express</b>	100%	100%

To ensure service quality, any service consistently operating at more than 100% of its seating capacity (load factor) will be evaluated to reduce overcrowding.

### VEHICLE HEADWAY

Generally, routes operating in urban areas have 15 to 30-minute headways during the peak and 30 to 60 minutes during the non-peak. Service in the less dense areas generally have one-hour headways. It should be noted the specific frequency levels are determined by each sponsoring jurisdiction in conjunction with planning and budget considerations.



### **ON-TIME PERFORMANCE**

On-time performance for HRT's bus service is measured against the published schedule and actual bus arrival times at approximately 200 designated time points throughout the system. A bus is considered "on-time" if not more than five minutes late or zero minutes early at each scheduled time point. There is approximately one time point for every 10 bus stops. Actual bus arrival times are captured by HRT's Navigator, an automatic vehicle location (AVL) system which uses Global Positioning System (GPS) technology. Bus on-time performance can be impacted by traffic congestion, detours, weather, a larger than anticipated number of boardings, and boardings of passengers with accessibility needs.

### **SERVICE AVAILABILITY**

Service availability in each of HRT's six cities is set by each of its member jurisdictions. This means that the number of routes, service frequency, service span, and service coverage areas as operated by HRT are directly determined by each city during the annual budgetary cycle. Article IV of HRT's Cost Allocation Agreement describes how transit service in the HRT service district is determined.

## ARTICLE IV PROVISION OF PUBLIC TRANSPORTATION SERVICES

1. The Commission will own and operate the consolidated regional public transportation system within and between the Participating Cities.

The Commission recognizes the service provided by local contract carriers and other transportation companies and will attempt to foster continuation and improvement of services provided by these private companies.

Each year, as part of the budgeting process, the Commission will propose a public Transportation Service Program (TSP) for the region. The TSP will contain a description of service such as route name, hours of service to be provided, estimated cost, estimated revenue and estimated city share of the cost of service. The TSP will identify the service program of each Participating City and its contribution based on estimated costs and revenues.

Each Participating City will review its portion of the TSP and recommend revisions where appropriate. After each Participating City has approved funding of its portion of the TSP, the Commission will approve and publish the TSP as the Transportation Service Program of Hampton Roads.

Each Participating City will determine the type, amount and location of public transportation services for which it provides funds within its borders. Each Participating City, by approving its portion of the TSP, agrees to pay monthly in advance its portion of the administrative, capital and net operating costs of the Commission's approved TSP.

Each Participating City will have final determination on the type, amount, and location of public - transportation service provided within its borders. Nothing in this Agreement will be construed as a requirement that a Participating City must provide public transportation services.

The Commission will provide the transit service contained in the TSP as approved by each Participating City and each city will finance its share of net capital and operating costs incurred by the Commission in providing transportation services contained in the approved TSP.

Additions, deletions, or revisions to the TSP may be proposed at any time by a Participating City by letter from the City Manager or his designated representative to the Executive Director of the Commission. Changes may also be proposed at any time by the Commission by letter from the Executive Director or his designated representative to the City Manager of a Participating City. If the change is to be implemented during the year of the previously approved TSP and increases the total In Service Hours for the Participating City, no federal or state public support funds already allocated will be applied to that service until that service is included in the annual TSP and budget.

Whenever an addition, deletion, or revision to the TSP is proposed, the Commission will develop an estimated cost of the proposed change. The estimated cost will be furnished to the Participating City or Participating Cities affected by the proposed change.

The Participating Cities will review and approve all proposed changes and estimated costs of the TSP before implementation by the Commission. The TSP will be revised to incorporate all changes approved by the Participating Cities. If no response is made by the City Manager or his designated representative before or at the public hearing, in the case of a change requiring a public hearing, or within 15 days before implementation in the case of a minor change, the Commission will assume that there are no objections to the service changes and will proceed.

Any capital cost or operating cost liability incurred by the Commission as a result of a reduction of transit service requested by a Participating City will be paid by the Participating City requesting the reduction until such time as the liability is relieved.

## SERVICE POLICIES

### TRANSIT AMENITIES

Transit amenities refer to fixed items of comfort and convenience available to the general riding public such as bus stop benches, shelters, lighting, and bike racks. HRT's Passenger Amenity Policy provides guidelines for proposing, planning, and implementing transit stop amenities in an effort to provide the highest quality of amenities to Hampton Roads Transit customers. The Passenger Amenities Policy is intended to be utilized with Hampton Roads Transit Bus Stop Location policy. The guidelines included considers the operational needs of HRT in addition to all federal and state mandates, including equity requirements under Title VI of the Civil Rights Act and accessibility requirements related to the Americans with Disabilities Act (ADA).

Bus stop amenities are provided by a myriad of sources including local governments, private developers, citizens' groups, as well as funds flowing to HRT. At times these amenities are not owned or maintained by HRT and are put in place without direction or control of the transit agency.

HRT inventories existing amenities within HRT's control and determines where new or replacement facilities should be located based on bus stop average daily boarding counts, property ownership status, minimum area requirements, infrastructure requirements and other related factors.

## **VEHICLE ASSIGNMENT**

Vehicle assignment refers to the allocation of transit vehicles to ensure that all communities receive the same quality of rolling stock benefits.

HRT fixed-route vehicles differ primarily by length of vehicle and age. Passenger amenities such as air conditioning and upholstery are standard. The length of vehicle assigned to a route is primarily determined by the ridership load and type of service (see the following table below), leaving age the primary variable to consider in equitable vehicle assignments. HRT average fleet age as of the adoption of this Title VI Program is 9.3 years and is anticipated to decrease over the next several years as the new fleet purchases outlined in HRT's Transit Development Plan are executed. In order to ensure equitable distribution of vehicles, each route is randomly assigned buses without regard to the vehicle age, as maintenance and repair needs permit. Also to note, the age/useful life of the vehicle may have been extended due vehicle/maintenance upgrades (ex. engine repower). However, those vehicles may be more reliable than a vehicle that is older based on acquisition year. Those vehicles (and related age) are also included in the random vehicle assignment.

HRT also provides vehicle assignment based on service type; which includes MAX service, by agreement with the State, and its seasonal service - VB Wave. As stated, the MAX service is a regional commuter service and is randomly assigned vehicles from HRT's coach fleet due to the type of service and its distance. As part of the state of Virginia's agreement with the Elizabeth River Crossing to construct and upgrade infrastructure in Portsmouth, ERC provided funding for HRT to purchase seven new buses that are assigned to routes 45 and 47. The city of Virginia Beach funded the purchase of replica trolley buses that are assigned to our seasonal service the VB Wave.

A sample table showing HRT vehicle assignment by route and vehicle size is attached in Appendix E. These assignments change with ridership levels, service adjustments, and available equipment. HRT plans to collect and analyze vehicle assignment data to further review vehicle assignment and its impacts on Title VI populations. If disparate or disproportionate impacts are found, HRT will address those as outlined in its Equity Analysis Procedures

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## CHAPTER 4: DEMOGRAPHIC AND SERVICE PROFILE MAPS AND CHARTS

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The FTA requires transit providers receiving federal assistance to provide demographic maps that identify census tracts where the percentage of total minority and low-income population residing in these areas exceeds the average minority and low-income population for the service area as a whole. The maps and charts must be updated: 1) at least every three years, 2) after each Federal census data become available, and 3) when there are significant changes in the transit system.

### POPULATION ETHNICITY CHARACTERISTICS

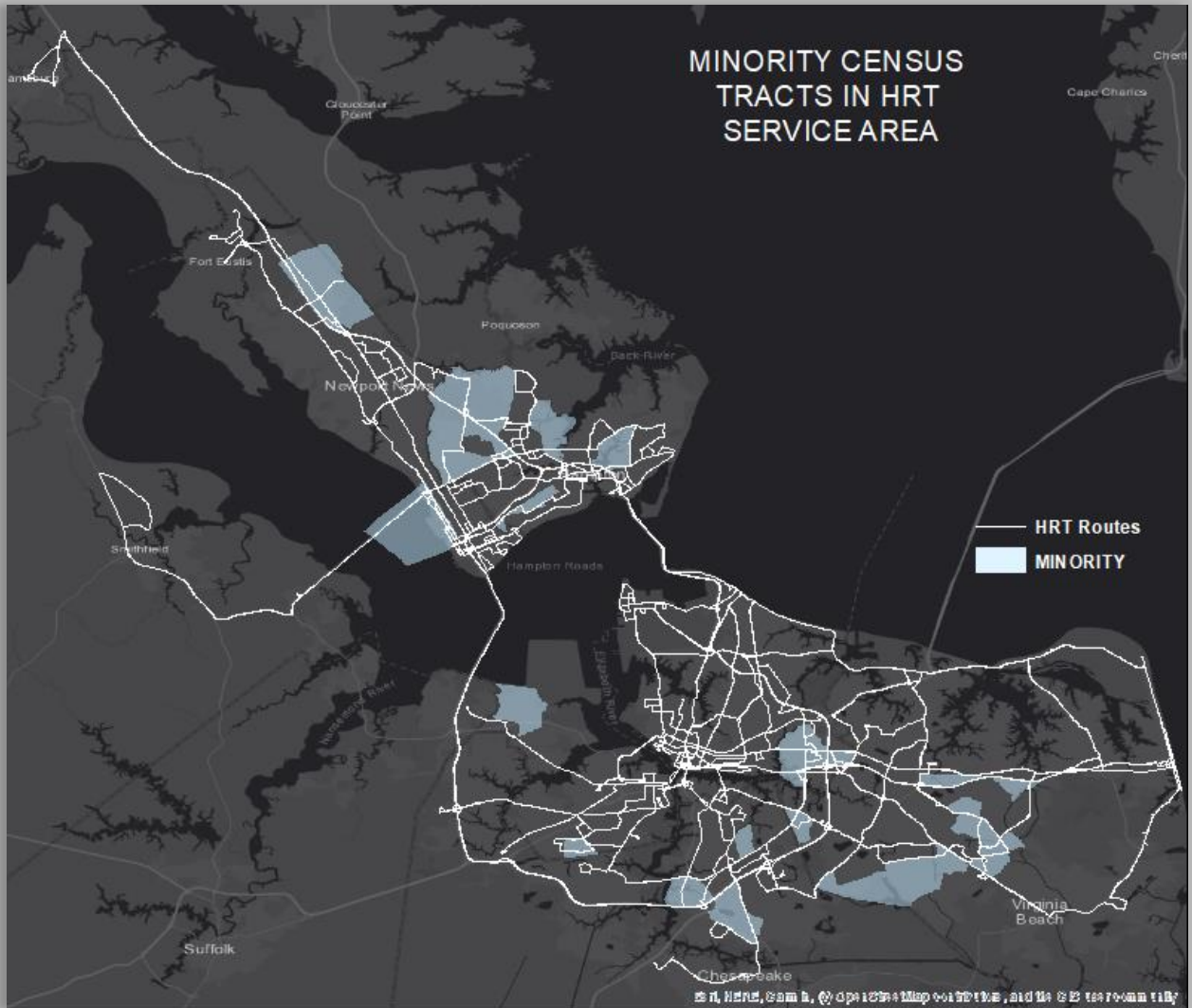
In 2018, the U.S. Census identified 1,344,586 residents in the census tracts within the HRT service area. The minority population includes Hispanic or Latino, African Americans, Asians, American Indians and Alaskan Natives, Pacific Islanders, other non-white races, and persons of two or more races. In the HRT service area, 44.7% of the residents were designated minority utilizing 2018 ACS data. **In this report, census tracts in which the minority percentage exceeds 44.7% are defined as minority tracts.**

TABLE 5: HRT SERVICE AREA MINORITY STATUS (2018 AMERICAN COMMUNITY SURVEY)

TOTAL POPULATION	MINORITY		NON-MINORITY	
1,344,586	601,618	44.7%	742,968	55.3%

The following map shows census tracts in which the percentage of minority residents is at or above 44.7% in the HRT service area. It also shows all Hampton Roads Transit routes as of August 2016\*.

FIGURE 6: MINORITY CENSUS TRACTS IN THE HRT SERVICE AREA



## INCOME CHARACTERISTICS

Hampton Roads Transit, utilizing accepted industry standards, considers persons living at or below 150% of the federal poverty line to be low-income for the purposes of this Title VI analyses.

Poverty Guidelines are provided by the U.S. Department of Health & Human Services in 2018 to define poverty in the 48 Contiguous States and the District of Columbia is shown on the following table.

**TABLE 6: POVERTY GUIDELINES BY HOUSEHOLD SIZE**

	<b>POVERTY GUIDELINE</b>
<b>1</b>	\$12,760
<b>2</b>	\$17,240
<b>3</b>	\$21,720
<b>4</b>	\$26,200
<b>5</b>	\$30,680
<b>6</b>	\$35,160
<b>7</b>	\$39,640
<b>8</b>	\$44,120
<b>9+</b>	\$48,600

(U.S. Department of Health & Human Services - 2020)

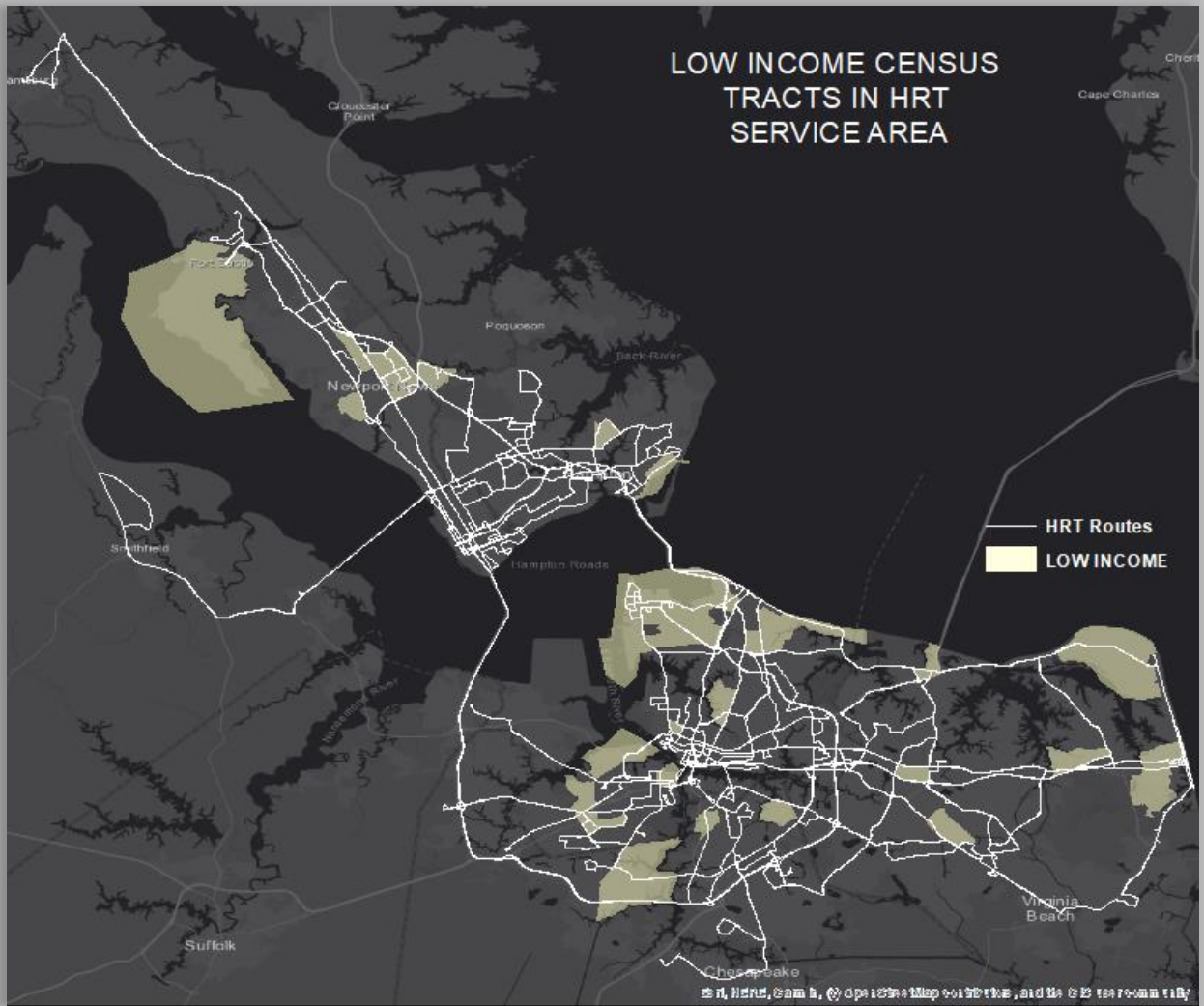
According to the guidelines and 2018 American Community Survey results, 19.3% of the population was living at or below 150% of the poverty line in HRT’s service area. In this report, census tracts in which the low-income percentage exceeds 19.3% are defined as low-income tracts.

**TABLE 7: HRT SERVICE AREA POVERTY STATUS (2018 ACS)**

<b>TOTAL POPULATION</b>	<b>PEOPLE BELOW 150% OF POVERTY LINE</b>	<b>LOW-INCOME PERCENTAGE</b>
1,344,586	259,508	19.3%

The following map shows the census tracts in HRT service area in which the percentage of low-income residents is at or above 19.3%:

FIGURE 7: LOW-INCOME CENSUS TRACTS IN THE HRT SERVICE AREA

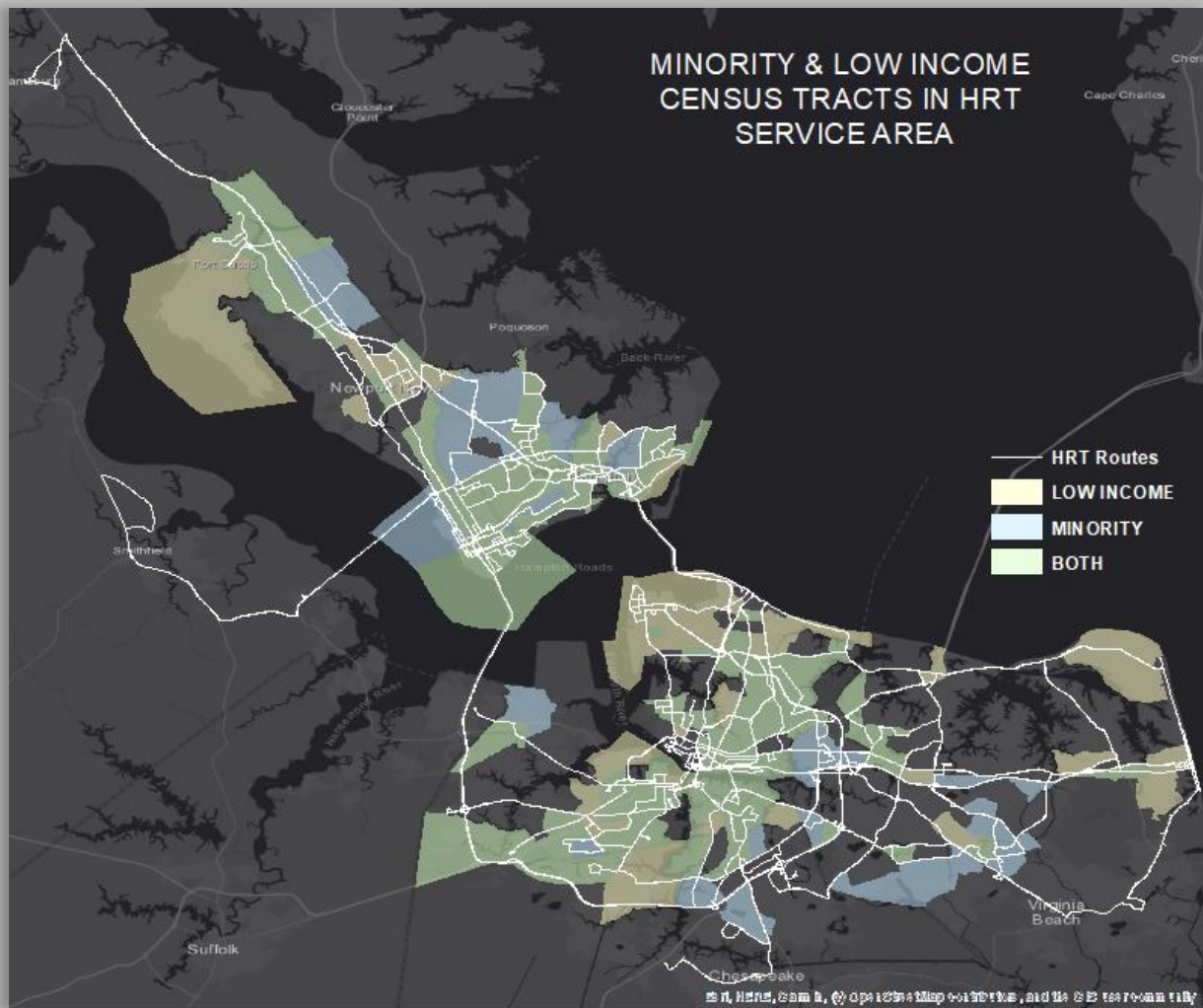




## COMPOSITE MINORITY & LOW-INCOME CHARACTERISTICS

To better understand the minority and low-income population distribution pattern, each census tract in HRT service area is classified into one of the following four categories: Minority Tract, Low-Income Tract, Minority and Low-Income Tract, and Non-Minority/Non-Low Income Tract. The following map shows the distribution pattern of minority & low-income populations in HRT's service area.

FIGURE 8: MINORITY & LOW-INCOME CENSUS TRACTS IN THE HRT SERVICE AREA



**TABLE 8: MINORITY & LOW-INCOME THRESHOLDS BY CENSUS TRACT DATA IN THE HRT SERVICE AREA**

CATEGORY	MINORITY PERCENTAGE	LOW-INCOME PERCENTAGE
MINORITY TRACT	≥ 44.7%	<19.3%
LOW-INCOME TRACT	<44.7%	≥19.3%
MINORITY & LOW-INCOME TRACT	≥ 44.7%	≥19.3%
NON-MINORITY / NON-LOW-INCOME TRACT	<44.7%	<19.3%

## ROUTING DEMOGRAPHIC CHARACTERISTICS

A route will be designated as minority or low-income route if over 33% of its length is in minority or low-income areas. A list showing the minority or low-income status for each HRT route can be found in Appendix F.

Ninety-one and one-half percent (87.3%) of existing HRT bus routes are defined as minority and/or low income routes. The remaining six routes are defined as non-minority, non-low-income routes. The Elizabeth River Ferry is a minority/low-income route, as is The Tide light rail line.

Hampton Roads Transit makes a concerted effort to take into account the needs of minority and low-income passengers during the service change process. This effort is represented in the distribution of resources in its service area.

## DEMOGRAPHIC RIDERSHIP AND TRAVEL PATTERNS COLLECTED BY SURVEYS

The last time demographic ridership and travel patterns were collected by surveys at Hampton Roads Transit was during the 2016 Origin & Destination Survey for all bus, ferry, and light rail routes. The data collected included information on fare usage, income, and minority status needed to conduct service and fare change analyses.

HRT plans to conduct an origin and destination survey of all bus, ferry, and light rail routes. HRT expects this data to be collected, completed and received in 2021. Once the survey is completed and the data expanded, HRT will update our system and route level ridership demographic information.

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## CHAPTER 5: SERVICE MONITORING

### EQUITABLE SERVICE AND AMENITIES

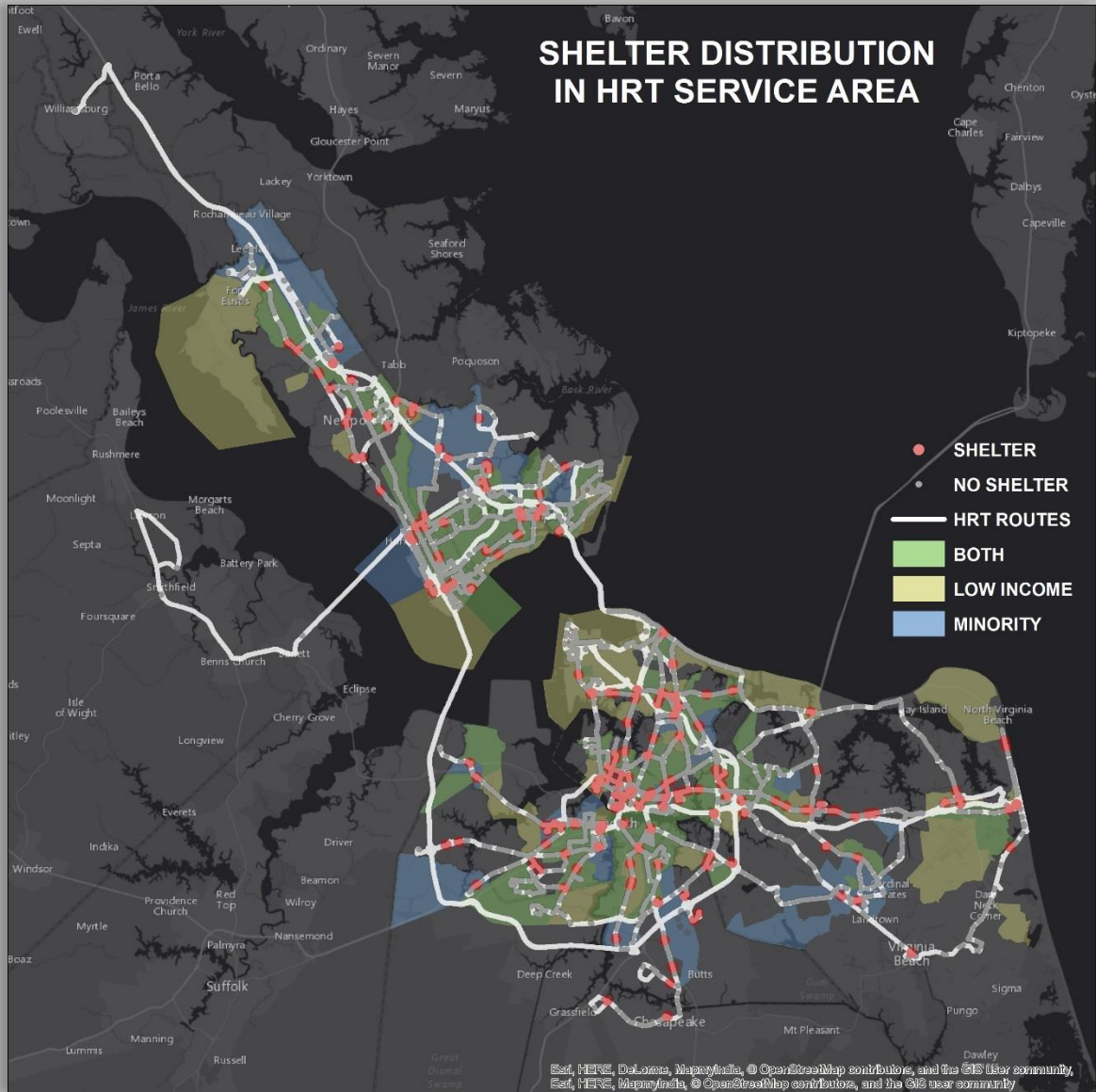
Hampton Roads Transit reviews the distribution and location of transit amenities to provide equitable distribution throughout its service area regardless of an area's socioeconomic demographics. HRT provides guidelines for proposing, planning, and implementing transit stop amenities in the Passenger Amenity Policy (2017). HRT analyzes amenity requests using specific stop criteria, including average daily boarding counts, property ownership status, minimum area requirements, and infrastructure requirements. The maps on the following pages show the current distribution of HRT owned and maintained shelters and benches throughout the HRT system (Figures 14 and 15, respectively).

As defined in Section 1.2, HRT's service area is designated as 44.7% minority and 20.2% low-income. As evidenced through the Figures 5 and 6 and the following table, HRT amenities are distributed equitably throughout its service area.

**TABLE 9: DISTRIBUTION OF HRT AMENITIES BY MINORITY AND LOW INCOME AREAS**

	% IN MINORITY TRACTS	% IN LOW- INCOME TRACTS	% IN MINORITY OR LOW INCOME	% IN NON- TITLE VI TRACTS	TOTAL STOPS W/AMENITY	TOTAL NUMBER OF STOPS	% OF STOPS W/AMENITY
BENCHES	62%	59%	73%	27%	194	2781	7%
SHELTERS	62%	59%	73%	27%	191	2781	7%

FIGURE 9: SHELTER DISTRIBUTION IN HRT SERVICE AREA



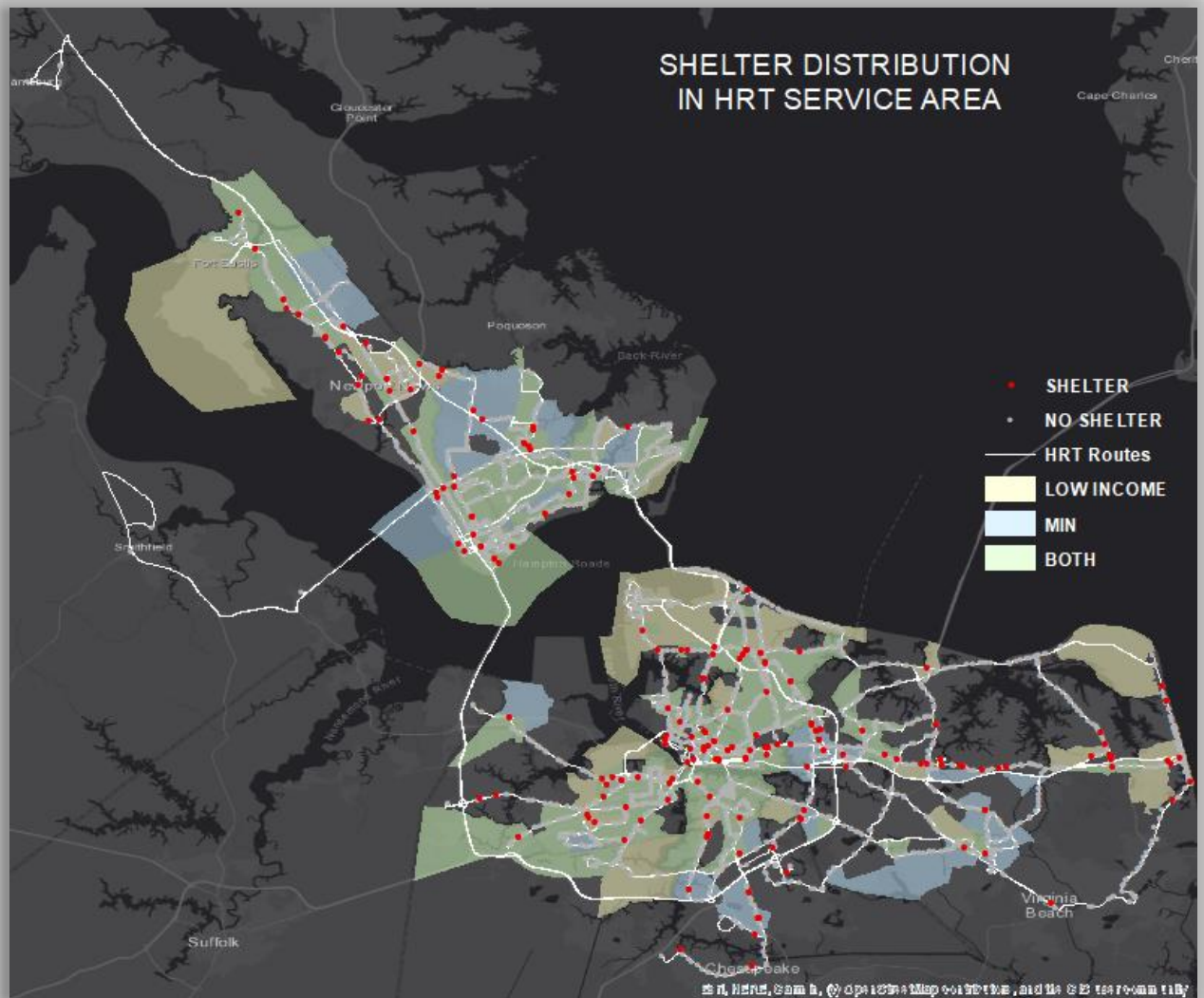
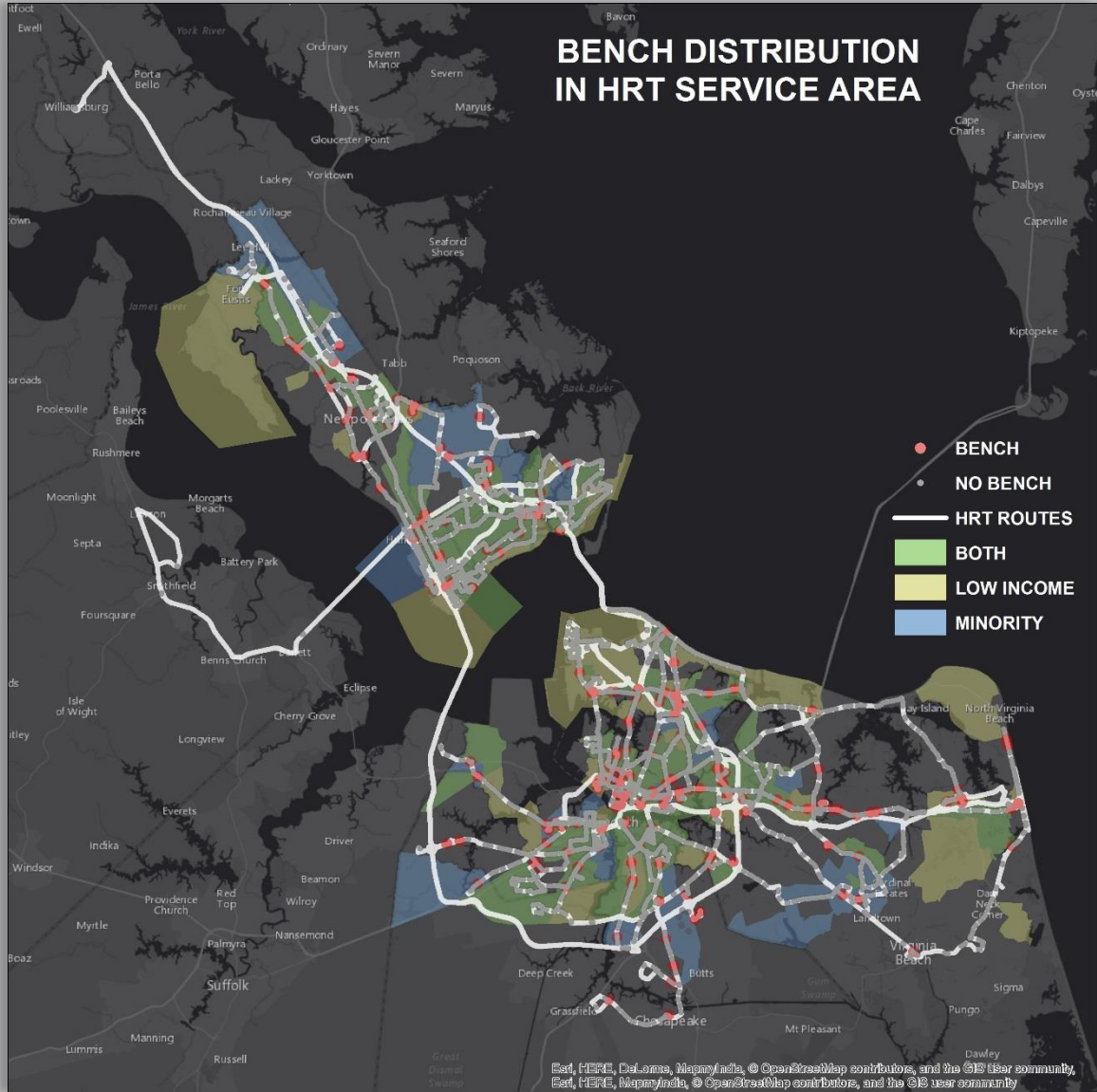
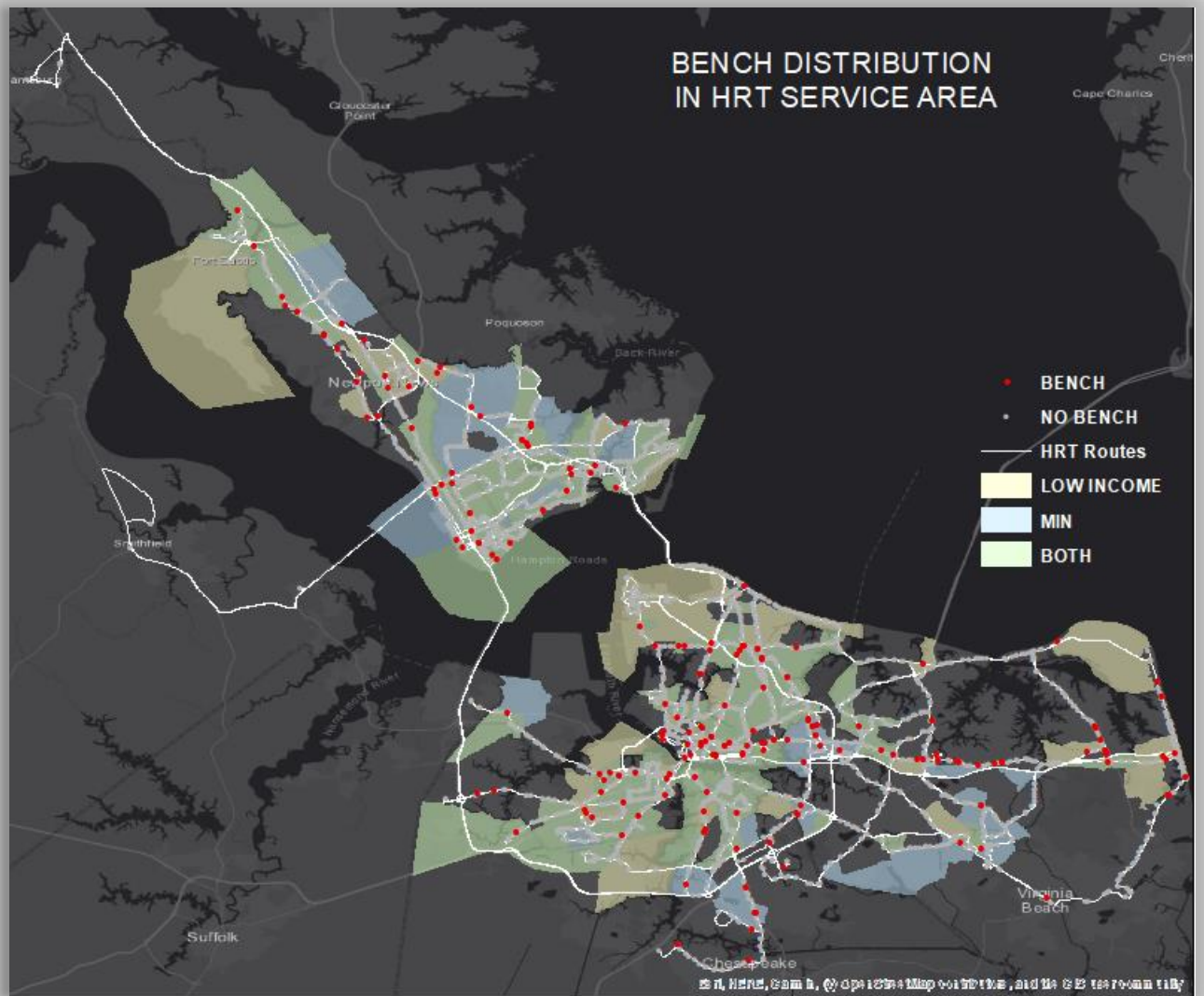


FIGURE 10: BENCH DISTRIBUTION IN HRT SERVICE AREA







## VEHICLE LOAD MONITORING

All bus lines throughout the service area are monitored for their vehicle load through periodic surveys and random sampling by data collector observations. Hampton Roads Transit continues to work to update its vehicle fleet with APC technology which will enable the agency to obtain peak load information from the APCs. Since 70% of the HRT fleet is now equipped with APC's, the agency plans to validate and certify the APCs to enable HRT staff to provide better vehicle load monitoring data.

The most recent survey data for HRT occurred in November 2013, whereby HRT was able to review random counts of average peak and daily loads. This data is representative of random trip ridership by route. Analysis of vehicle load averages using this data shows that average maximum load per trip is below 100% of seating capacity on all routes. A route-by-route breakdown of average vehicle load as well as maximum observed vehicle load using the November 2013 data can be found in Appendix G.

When evidence is presented through data collection efforts or through customer comments that the load factor on a route is being exceeded, HRT will review the service and make recommendations or adjustments to alleviate the problem.

## ON-TIME PERFORMANCE REPORT\*

On-time performance for HRT's bus service is measured against the published schedule and actual bus arrival times at approximately 200 designated timepoints throughout the system. A bus is considered "on-time" if it is not more than five minutes late at each scheduled time point and if it is less than zero minutes early. There is approximately one timepoint for every 10 bus stops. Actual bus arrival times are captured by HRT's Navigator an automatic vehicle location (AVL) system which uses Global Positioning System (GPS) technology. Hampton Roads Transit reports on-time performance monthly to the TDCHR Operations and Oversight Committee. Data is also available for the Top 10 Best and Worst on-time performing routes.

The average system-wide on-time performance was reported at 78% as of January 2020.

Based on the 2016 Origin & Destination Survey, the MAX and fixed-route bus service routes averaged 75% minority riders and 71% low-income riders. HRT assessed the minority and low income ridership levels for the top ten performing routes (Routes 919, 922, 43, 5, 11, 26, 114, 47, 13, and 108 from best to worst) and the worst ten performing routes (Routes 18, 967, 966, 64, 58, 403, 430, 405, 117, and 415 from best to worst) and compared these levels to the average. As shown in the table below, the minority and low-income ridership for the top ten routes is comparable to the average system route. The worst ten routes had lower percentages of minority and low income riders when compared to the average.

**TABLE 10: PERCENT MINORITY AND LOW-INCOME RIDERS ON BEST AND WORST PERFORMING ROUTES**

	% MINORITY	% NON-MINORITY	% LOW-INCOME	% NON-LOW-INCOME
<b>AVERAGE</b>	75%	25%	71%	29%

<b>TOP 10 ROUTES</b>	71%	29%	73%	27%
<b>WORST 10 ROUTES</b>	77%	23%	56%	44%

## SERVICE AVAILABILITY ANALYSIS

HRT strives to make transit available to as many people within its six-city service area as possible. Table 9 and 10 below show the percentage of the minority/non-minority and low income/non-low income population served by transit within the HRT service area. The percentages in the tables reflect the proportion of individuals within ¼ mile of a transit stop. As the data shows, minority and low income populations have better access to transit than both non-minority/non-low income populations and the population within the entire service area.

**TABLE 11: MINORITY TRANSIT AVAILABILITY**

MINORITY TRANSIT AVAILABILITY		
POPULATION	Within 1/4 Mile	More Than 1/4 Mile
<b>MINORITY</b>	95.5%	4.5%
<b>NON-MINORITY</b>	90.5%	9.5%
<b>SYSTEM</b>	92.8%	7.2%

**TABLE 12: LOW INCOME TRANSIT AVAILABILITY**

LOW INCOME TRANSIT AVAILABILITY		
POPULATION	Within 1/4 Mile	More Than 1/4 Mile
<b>LOW INCOME</b>	97.1%	2.9%
<b>NON-LOW INCOME</b>	91.7%	8.3%
<b>SYSTEM</b>	92.8%	7.2%

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## CHAPTER 6: SERVICE AND FARE CHANGES

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### MAJOR SERVICE CHANGES SINCE 2017

Hampton Roads Transit has implemented several major service changes since 2017 as reported in the related Equity Analyses.

**TABLE 13: EQUITY ANALYSIS REPORTS BY SERVICE BOARD**

SERVICE CHANGE	IMPLEMENTATION DATE
SUMMER 2017	6/21/2017
FEBRUARY/JUNE 2018	2/16/2018 6/7/2018
OCTOBER 2018	10/21/2018 10/22/2018
OCTOBER 2019	10/21/2019

Title VI Equity Analysis Reports for all Major Service Changes are attached in Appendix H.

### FARE CHANGES SINCE 2017

Hampton Roads Transit has not implemented a fare change since the submission of its last Title VI Report in January 2017.

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## APPENDICES

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## APPENDIX A: PUBLIC PARTICIPATION PLAN

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***Hampton Roads Transit:***  
**Public Participation Plan**

**Updated:**  
**January 2020**



## **HRT Commitment to Public Involvement and Non-Discrimination**

HRT is committed to informing and involving the public in the planning and delivery of public transportation services in the region. HRT will diligently work to overcome obstacles that may hinder effective public involvement. Public information and experiences are consistently used to update its plans to improve public participation.

HRT takes public involvement seriously and will continuously work to add new components to all public involvement efforts in order to facilitate achieving public participation goals or to comply with amended laws or regulations relative to Title VI of the Civil Rights Act of 1964. Title VI of the Civil Rights Act of 1964 states that “no person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

Subsequent laws and Presidential Executive Orders further prohibit discrimination based on handicap, sex, age, or income status. In accordance with these laws and regulations, HRT assures that no person shall, on the basis of race, color, national origin, handicap, sex, age, or income status, be excluded from participation in, be denied benefits of, or be otherwise subject to discrimination under any program or activity.

Pursuant to Federal Transportation Administration Title VI regulatory guidance Circular FTA C4702.1B, “Every Title VI program shall include an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Program submission. A recipient’s targeted public participation plan for minority populations may be part of efforts that extend more broadly to include other constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others”.

To meet these requirements, this public participation plan will provide detailed information how HRT complies with Title VI objectives listed as follows:

- Ensure the level and quality of public transportation service is provided in a nondiscriminatory manner.
- Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin.

- Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

## **The Purpose of the Public Participation Plan**

The public participation plan describes the overall goals, public involvement strategy and outreach methods used to reach out to all members of the public. HRT also ensures meaningful outreach is extended for low-income, minority and LEP populations. HRT views public involvement as a significant factor when making transportation decisions. Public involvement provides an ample mix of perspectives and value to HRT's planning decisions. Some key benefits of an established and supported Public Participation policy are as follows:

- Improved public understanding of complex public policy decisions which increases the opportunity for public consensus on planning decisions.
- Encourages proactive community involvement with HRT's planning staff.
- Demonstrates transparency in HRT's planning decisions and policies.
- Establishes meaningful relationships with underserved populations.

### **Public Participation Plan Goals**

- Inform the public about HRT services and initiatives.
- Maintain consistent and complete transparency with the public.
- Allow the plan to facilitate a responsive and accountable relationship with the ridership community.
- Increase public awareness and actively involve the public in transit service planning decisions and delivery.
- Proactively promote the open exchange of information to solicit public feedback that will identify how proposed changes to service will affect our customers in a way that may not be readily apparent to HRT staff.
- Comply with federal and state laws and regulations.

### **Definitions**

The following definitions are used within the HRT Public Participation Plan.

**Discrimination:** Refers to any action or inaction, whether intentional or unintentional, in any program or activity of a Federal aid recipient, sub-recipient, or contractor that results in disparate treatment, disparate impact or perpetuating the effects of prior discrimination based on race, color, or national origin.

**Limited English Proficient (LEP) Population:** Refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

**Low-Income Population:** Refers to any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FTA program, policy or activity.

**Minority Persons** include the following:

- American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
- Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
- Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
- Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

**Minority Population:** Means any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations (such as migrant workers or Native Americans) who will be similarly affected by a proposed DOT program, policy, or activity.

**Outreach:** An effort by an organization to educate, inform, to engage and seek input from other organizations, groups, specific audiences or the general public.

**Outreach Methods:** Methods that identify and invite target audiences and stakeholders to participate in a public participation opportunity.

**Provider of Fixed Route/Guideway Public Transportation (or “Transit Provider”):** Means any entity that operates public transportation service and includes States, local and regional entities, and public and private entities.

**Public Transportation:** Means regular, continuing shared-ride surface transportation services that are open to the general public or open to a segment of the general public defined by age, disability, or low income: and does not include Amtrak, intercity bus service, charter bus service, school bus service, sightseeing service, courtesy shuttle service for patrons for one or more specific establishments, or intra-terminal or intra-facility shuttle. Public transportation includes buses, subways, light rail commuter rail, monorail, passenger ferry boats, trolleys, inclined railways, people movers, and vans. Public transportation can be either fixed route or demand response service.

**Public Input:** Participation methods that seek community feedback on a policy, project, program or activity. A response is required from the public.

**Public Participation:** Any process that seeks to involve the public in decision-making processes. Public participation is an umbrella term that describes methods including: public information, education, outreach, input, involvement, collaboration and engagement.

**Public Participation Plan:** A tailored plan that describes how HRT achieves public involvement, information, education, participation and/or outreach methods.

**Service Area:** Refers either to the geographic area in which a transit agency is authorized by its charter to provide service to the public, or to the planning area of a State Department of Transportation or Metropolitan Planning Organization.

**Target Audience:** Low income, minority and Limited English Proficiency (LEP) populations.

**Title VI Program:** Refers to a document developed by a FTA recipient (in this instance, HRT) to demonstrate how the recipient is complying with Title VI requirements. Direct and primary recipients must submit their Title VI Programs to FTA every three years. The Title VI Program must be approved by the recipient’s board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA.

For State DOTs, the appropriate governing entity is the State's Secretary of Transportation or equivalent.



## HRT's Public Participation Process

HRT adheres to a proactive public participation process. All public involvement activities must be functional for HRT decisions and must be meaningful to the public. HRT benefits from public involvement by engaging the public at the earliest project stages from the development of the purpose and need through project implementation. HRT's public involvement activities increases public awareness and give the public an active voice in planning decisions. HRT's public participation process includes the following steps:

**Step 1** ➡ Outline a public participation plan at the beginning of key HRT planning projects.

**Step 2** ➡ Previously established mailing and email lists are identified.

**Step 3** ➡ Update existing mailing and email lists; new lists are created.

**Step 4** ➡ All final project documentation is archived with HRT's records management department throughout the life of the project.

**Step 5** ➡ Based on a project's milestones and requirements, a public involvement timeline is created.

- The public involvement timeline outlines each activity of the project's outreach efforts.

**Step 6** ➡ The effectiveness of the public participation plan is periodically assessed throughout the life of the project, to determine if the public involvement objectives were achieved.

- The public participation strategy is assessed at different stages of a project to determine if the practices were effective in reaching each of the expected populations and, equally important, whether the events created opportunities for meaningful involvement.
- HRT will change the public participation strategy to improve future performance in response to the assessment.

## **Public Involvement on Fare and Service Changes**

Federal Transit Administration, (FTA) regulations requires, “a locally developed process to consider public comment before raising a fare or carrying out a major reduction in transportation service”<sup>1</sup> as defined by HRT’s Title VI Policy.

HRT uses a broad range of outreach tools documented in this plan to serve this requirement, including newsletters, on-board notices and announcements, social media (ex. Facebook posts, Twitter), website comment forms, and open public meetings in an effort to gain public review and comment. All public comments become part of the official record.

## **Public Notice on Program of Projects**

Each year HRT is also required to provide public notice and an opportunity for holding public hearings on the agency’s proposed Program of Projects. These are projects HRT intend to use federal grant funds (Section 5307) (49 U.S.C. 5323(b)). The purpose of the public notice is to give citizens, private transportation operators, and local officials an opportunity to examine the contents of the proposed program, ensure equity, and to allow comments on the proposed program.

Each year, the Grants Administration Officer at HRT complies with this requirement through the publishing of the Program of Projects in local newspapers. A formal public hearing is held and announced in a public notice if written requests are received within 30 days of the publishing of the Program of Projects.

## **Public Hearings for Compliance with the National Environmental Policy Act**

HRT will complete a full public involvement process for major capital projects requiring review and analysis under the national Environmental Policy Act. This shall include all Environmental Impacts Statements (EIS), and it may include Environmental Assessments and Categorical Exclusions in situations of public controversy or sensitivity. Each program will have an individually defined public participation plan tailored to the project needs and requirements.

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<sup>1</sup> See U.S. Department of Transportation Circular FTA C4702.1B (2012) Chapter III-6.

## Public Notice on DBE Program and Goals

The Transportation District Commission of Hampton Roads (TDCHR), the public transportation system serving the Hampton Roads metropolitan area establishes a Disadvantaged Business Enterprise (DBE) utilization goal on Federal Transit Administration funded projects for each Federal Fiscal year's (FFY). The goal is derived using Virginia Department of Minority and Business Enterprise's Unified Certification program Directory, previous Fiscal year achievement, Vendor's List, and current area business consultations.

In accordance with 49 CFR Part 26.45 (g), TDCHR invites maximum public participation and solicits comments regarding the proposed goal. Further, TDCHR invites the submission of evidence and information that may support the use of mixed components of race-conscious and race-neutral measures to achieve the overall goal.

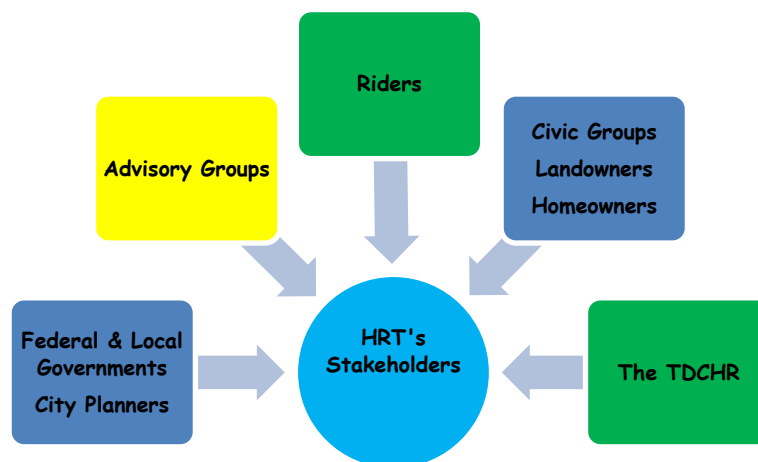
A complete description of the proposed goal is made available for public inspection for 45 days from the date of the initial notification online at [www.gohrt.com](http://www.gohrt.com). It is also made available at the reception desk at HRT Headquarters at 3400 Victoria Boulevard, Hampton, VA 23661 or 509 East 18<sup>th</sup> Street, Norfolk, VA 23504.

Comments on the proposed program goal are accepted after the publication of the notice. The public is advised to send all comments to the DBE/Contract Compliance Office or by email to [dbe@hrtransit.org](mailto:dbe@hrtransit.org).

## Target Audiences

HRT's target audience for public involvement is its stakeholders. HRT's stakeholders include HRT system riders, the public, area businesses, the TDCHR, and federal, state, and local governments. The public is defined as citizen advisory committees, advocacy groups, civic groups, homeowners, business owners and landowners; all whom who may be impacted by transit planning decisions. HRT works closely with the target audience on key projects and planning decisions to ensure transparent decision-making and meaningful input and consideration of public input.

In addition to broad public involvement, HRT takes care to ensure meaningful involvement among groups of people traditionally disenfranchised from the public process. This includes minority groups based on race, ethnicity, and national origin as well as low-income populations. HRT uses on-board rider surveys to identify characteristics of system riders and U.S. Census Bureau data to identify low income, minority and LEP populations in the six cities served by HRT. Through these data sources, we can more effectively target these regions and riders.



## HRT's Stakeholders

HRT stakeholder list includes but is not limited to:

- Statewide and Local Agencies and Governments

- Advocacy groups
- Community development organizations
- Civic Leagues
- Local elected officials and staff
- Business Owners
- State and local land-use planners
- Architects, archeologists, landscape architects, architectural historians, etc.
- General public
- Minorities and ethnic groups
- Low-Income groups
- Educational institutions, museums
- Historic district commissions
- The TDCHR

### **Limited English Proficient Customers**

Pursuant to FTA guidelines “recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited-English-proficient (LEP).”<sup>2</sup> LEP customers may reach HRT and receive route assistance by calling 757-222-6000 during business hours in their desired language. HRT uses a translation service called Certified Language Services with US based translators. The service supports 180 languages.

When there is a LEP request for a public meeting, HRT will ensure all meeting content is available for LEP customers in both print and online. LEP customers may also use the Google Translate function on gohrt.com which translates the website into their desired language. Google Translate is a web-based service provided by Google Inc. to translate written text from one language into another. The link to this site is available on [www.gohrt.com](http://www.gohrt.com).

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<sup>2</sup> See U.S. Department of Transportation Circular FTA C4702.1B (2012) Chapter III-6.



## Public Communication and Outreach Tools

Different public involvement strategies, tools, and activities are applicable in different areas. HRT may use traditional and non-traditional outreach methods. Traditional outreach may involve a public meeting or hearing. Non-traditional outreach may involve social media, pop-up meetings, interactive web-based tools, or community partnerships. Public participation efforts may also vary depending on the information offered. HRT is familiar with its service community and makes every effort to know key demographic aspects about where they work, live, what venues they may frequent, what languages they speak, and how they get their information.

For example, public involvement requirements are different in the case of a route change compared to a long-range transit planning study. The most common areas include the following:

- Daily operations
- Fare changes
- Service changes (including schedules and route changes)
- Transit development plans, corridor studies
- Capital projects
- Marketing (including advertising, public service announcements, and safety campaigns)
- Human services transportation (including transit planning for persons with disabilities, seniors, and low-income populations)

HRT uses various public involvement methods. These different outreach methods provide a broader window of opportunity for HRT to provide meaningful public input in everyday operations and activities as well as proposed changes in service, operations, or fare. Outreach methods were designed to be aligned with the public involvement goals ensuring public awareness, education and an opportunity for meaningful interactions, and public input on key planning decisions. These methods are also used to ensure compliance with Federal Transit Administration guidelines under Title VI of the Civil Rights Act.

## **Customer Feedback**

HRT encourages public comment and suggestions (formal and informal). Public comments are accepted via customer service, gohrt.com, Facebook and Twitter. HRT's customer contact center receives about 75,000 calls each month. All customer feedback is entered into the customer assistance database for follow up within seven business days. HRT has a dedicated customer advocacy team for this purpose.

## **Customer Alerts**

Customer Alerts inform the public of significant agency events such as a change in hours, route schedules, public hearings, meetings, special events, safety messages and other important information. Customer Alerts are posted at transfer centers, distributed on routes, on gohrt.com and through social media (ex. Facebook and Twitter).

"goAlerts" is a free email and text subscription service. Customers are encouraged to sign up for "goAlerts" on HRT's homepage at [www.gohrt.com](http://www.gohrt.com). Subscribers receive real time updates on service changes and events through automated emails or text messages.

## **Print and electronic media**

Print and electronic advertisements are used to inform the public of various changes, events and services. We use these methods mainly on buses, transfer centers, transit centers.

## **Partnerships with Community-Based Organizations**

HRT fosters strong community partnerships by regularly engaging community based organizations for its public involvement initiatives. Civic leagues and other community based organizations can be helpful in clarifying the best outreach strategies for their constituent community. These partnerships result in increased public participation, better meeting locations and overall better meetings. HRT purposefully seeks community based organizations that serve diverse groups and have proven to be helpful in gaining public participation.



## **Participation in local community events**

To insure community engagement, HRT actively participates in city sponsored community events. HRT collaborates in a consistent and planned manner with the region's city planning, communications and safety offices. During these events, HRT's public outreach team will advocate on behalf of and educate the public on the importance of public transportation. HRT distributes transit materials relative to the location during every community event.

## **School Outreach**

The public outreach team regularly visits the region's schools to teach and engage students about public-transportation. Students are encouraged to participate in discussions, lessons and facility tours. The topics reviewed during school outreach sessions include; how to use public transportation, the importance of transportation safety and the different modes of public transportation. An HRT bus and driver may be staged at the school. This allows the students to have an interactive experience.

## **Transit Riders Advisory and Paratransit Advisory Committees**

The Transit Riders Advisory Committee and Paratransit Advisory Committee are subcommittees of the TDCHR Executive Committee and report to the Chair of the Executive Committee. The Paratransit Advisory Committee and the Transit Riders Advisory Committee both meet bi-monthly. The Paratransit Advisory Committee members include persons with disabilities who use regular public transportation or Paratransit services. The Transit Riders Advisory Committee members include customers who ride public transportation on a daily and/or weekly basis. Participants on both committees serve on a voluntarily basis.

Contact information for HRT staff liaisons for these committees as well meeting dates, times, and locations are listed on HRT's website at [www.gohrt.com/about/governing](http://www.gohrt.com/about/governing). Meeting agendas are posted to the HRT website prior to the meeting; and meeting minutes are posted to the HRT website within two weeks after the meeting. All TRAC and PAC meetings are open to the public and visitors are invited to comment as noted on the meeting agenda.

## **Meet & Greet/ Open House**

Meet and Greet or Open House programs allow our customers to speak with the staff face to face. The public involvement team regularly hold meet and greet sessions at transit and transfer centers, area colleges and businesses.

The Open House session provides an interactive forum for public involvement. Open House sessions can be helpful in major planning projects because it allows an opportunity for the public to review visual aids and speak one on one with HRT representatives about the project. The Virginia Beach Transit Extension open house is a good example of a successful Open House session would be). The public was able to ask specific questions tailored to their personal experiences or concerns. Participants also had an opportunity to discuss the project with HRT staff and have their questions answered quickly. The Open House session enabled HRT to inform the public on the project's status.

## **Surveys**

HRT conducts surveys on a regular basis. The purpose of the survey is to help the agency understand ridership demographics, trip characteristics, and quality of service it delivers. The survey information also helps us determine where improvements or changes are required. Surveys are conducted on-line, on-board HRT services, and at HRT transit centers.

## **Public Meetings and Hearings**

A public meeting is an event organized by the agency at a specific date, time, and location. The public meeting provides a structured environment for the public to learn about upcoming changes, personally interact with the agency, and give input on the proposed changes. Public meetings may include, but are not limited to, traditional settings, open houses, workshops, charettes, small group meetings, or citizen advisory committee meetings.

A public hearing is a formalized public meeting where the public's input may be included in the decision-making process.

HRT uses the "Hampton Roads Transit Policies and Procedures - Public Hearings and Meetings" PD-107, adopted 8-23-2013 for all public meetings and public hearings.

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# APPENDIX B: LIMITED ENGLISH PROFICIENCY PLAN

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***Hampton Roads Transit:***  
**Limited English Proficiency Plan**

**Updated:**  
**2020**



## INTRODUCTION

Hampton Roads Transit (HRT), incorporated on October 1, 1999, began through the voluntary merger of Pentran and Tidewater Regional Transit, the region's two existing public transit operators. HRT is governed by the Transportation District Commission of Hampton Roads (TDCHR), which consists of 13 members, one elected official and one citizen representative from each city served by Hampton Roads Transit, and the chairman of the Commonwealth Transportation Board (CTB) or a designee. Citizen representatives are appointed by the Governor. The purpose of the Commission is to provide reliable and efficient transportation services and facilities to the Hampton Roads community, located in southeastern Virginia. HRT currently serves six municipalities of the Southside and Peninsula areas of Hampton Roads, consisting of the cities of Hampton, Norfolk, Newport News, Portsmouth, Chesapeake, and Virginia Beach. The City of Suffolk elected to remove itself from the HRT service area effective December 30, 2011.

### Legal and Regulatory Context

Federal regulations require that recipients of federal funds take reasonable steps to ensure meaningful access to their services and benefits for persons with limited English proficiency. Under these regulations, programs and activities normally provided in English must be accessible to persons who have a limited ability to speak, read, write, or understand English. Otherwise, English-only services may be discriminatory on the basis of national origin, in violation of Title VI of the Civil Rights Act of 1964, as amended, and its implementing regulations.

This four-factor analysis identifies appropriate language assistance measures needed to improve access to HRT services and benefits for limited English proficient (LEP) persons. This Language Assistance Plan (LAP) assesses language needs in the six-city HRT service area shown in 0.

### Purpose of this Document

HRT developed a Limited English Proficiency Plan (LEPP) in December, 2010 and committed to regular updates of the LEPP when population and demographic data for the service area is updated, or when additional HRT technological, staff, or financial resources become available to support further meeting the needs of the LEP population. This document will provide an update on:

- The population and demographic profiles of the LEP population in the HRT service area (please see Figure 1) and
- The resources available and measures taken to address the needs of the HRT LEP population.

### LEP Methodology

HRT has updated the Limited English Proficiency Plan to provide language assistance for LEP persons seeking meaningful access to HRT programs as required by Executive Order 13166, USDOT, and FTA's policy guidance. In developing the LEPP, the HRT staff undertook an update of the previous LEPP Four-Factor LEP analysis, which requires the following considerations:

- Factor 1. The number or proportion of LEP persons eligible to be served or likely to be encountered by HRT programs, activities, or services.

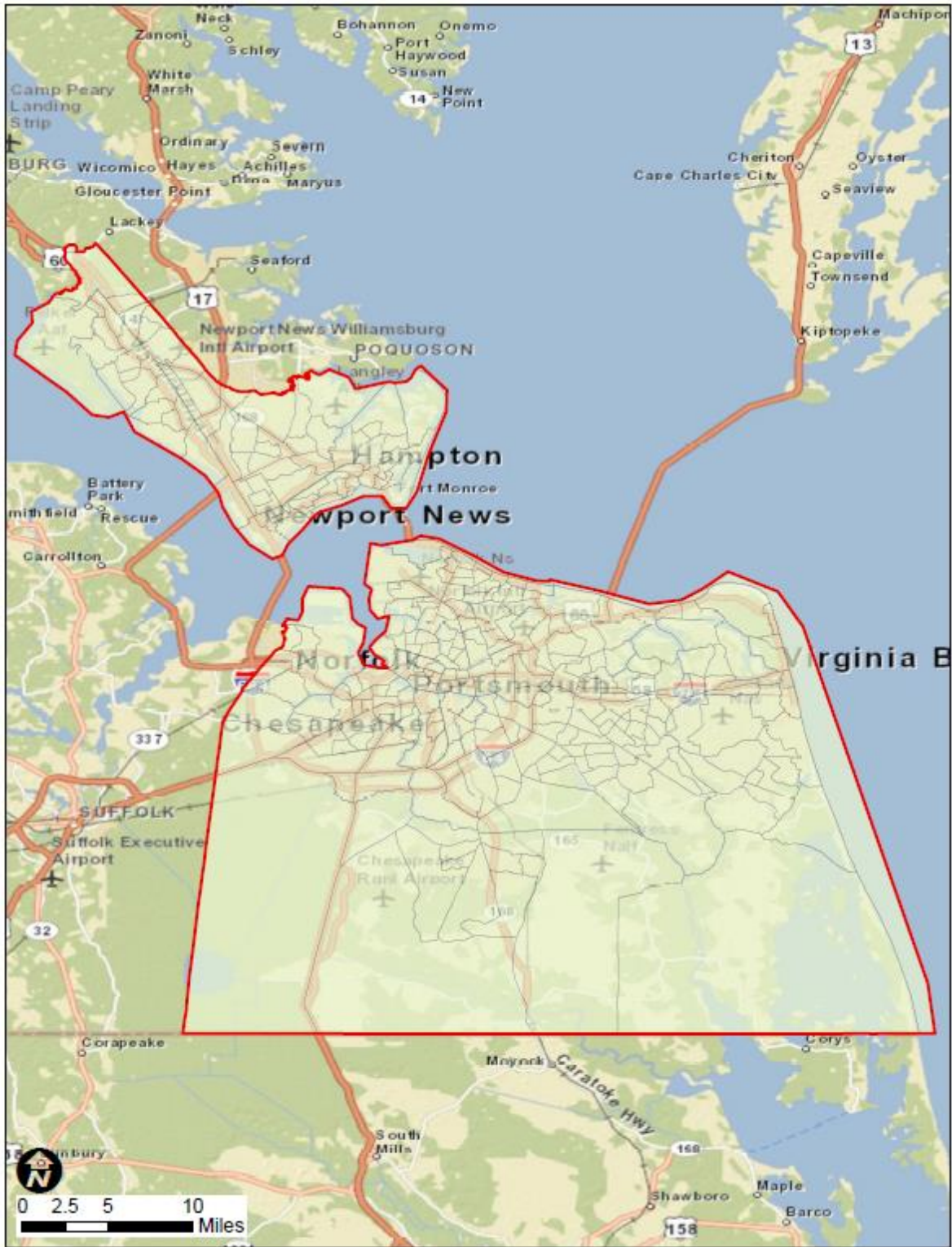
- Factor 2. The frequency with which LEP individuals come in contact with HRT programs, activities, or services;
- Factor 3. The nature and importance of the program, activity or service provided by the HRT to the LEP population; and
- Factor 4. The resources available to the HRT and overall cost to provide LEP assistance.

#### **Data Sources**

Determining the presence of LEP populations in the HRT service area was completed through an analysis of the American Community Survey (ACS) 2015 5-Year Estimates for census tracts that lie within the six-city HRT service area.



**Six-City HRT Service Area**



## FOUR FACTOR ANALYSIS

Each of the four factors noted above will be considered with updated population estimates, and compared to the findings from the December, 2010 LEPP in the following sections. Agencies that provide language assistance to persons with limited English proficiency in a competent and effective manner will help ensure that their services are safe, reliable, convenient, and accessible to those persons. These efforts may attract riders who would otherwise be excluded from participating in the service because of language barriers.

### Factor 1: LEP Population Identification

The Factor 1 analysis assesses the number and proportion of persons with limited English-speaking proficiency likely to be encountered within HRT’s six-city service area. The LEP population is those persons who reported to the American Community Survey that they speak English “less than very well.”

Table 1 below shows, for those five years and older: the total population by city, the population that only speak English, the population that speak other languages, and the population that do not speak English well or at all. It is this last group that comprises the LEP populations within HRT’s member cities. As shown in the last column in Table 1, across HRT’s seven member cities, the percentage of the population that does not speak English well or at all is three percent (3.00%).

**English Proficiency, by City in HRT Service Area**

City	Population 5 years and over, Total	Population 5 years and over, Speaks language other than English in the home, Speaks English Very Well, Total	Population 5 years and over, Speaks language other than English in the home, Does not Speak English Very Well, Total	% of Population 5 years and over, Does not Speak English Very Well, Total
Chesapeake	213,662.00	10,994.74	4,156.76	2%
Hampton	128,312.00	6,643.69	2,690.42	2%
Newport News	167,840.00	10,812.40	7,665.65	5%
Norfolk	227,889.00	15,285.03	7,802.05	3%
Portsmouth	88,790.00	3,483.57	975.91	1%
Virginia Beach	415,876.00	34,334.91	15,035.73	4%
<b>Grand Total</b>	<b>1,242,369.00</b>	<b>81,554.33</b>	<b>38,326.51</b>	<b>3%</b>

Source: U.S. Census Bureau, 2012 American Community Survey, 2015 American Community Survey

**Comparison of English Proficiency, 2000 Census Data, 2012 5-Year ACS Estimates, and 2015 5-Year ACS Estimates for Current HRT Service Area**

Source: U.S. Census Bureau; 2000 Census, 2012, 2015 American Community Survey. The table below compares the values from each of the LEP analyses in 2010, 2012, and 2014.

City	Population 5 years and over, Total			Population 5 years and over, Does not Speak English Very Well, Total			Percentage of Population 5 years and over, Does not Speak English Very Well		
	2000 Census	2012 5-Yr ACS	2014 5-Yr ACS	2000 Census	2012 5-Yr ACS	2014 5-Yr ACS	2000 Census	2012 5-Yr ACS	2014 5-Yr ACS
Chesapeake	185,025	208,881	213,662.00	1,238	4,795	4,156.76	0.67%	2.30%	1.95%
Hampton	137,303	128,642	128,312.00	1,048	2,709	2,690.42	0.76%	2.11%	2.10%
Newport News	165,897	167,330	167,840.00	1,666	6,770	7,665.65	1.00%	4.05%	4.57%
Norfolk	217,818	226,213	227,889.00	2,021	7,382	7,802.05	0.93%	3.26%	3.42%
Portsmouth	93,508	88,717	88,790.00	632	890	975.91	0.68%	1.00%	1.10%
Virginia Beach	394,892	410,322	415,876.00	4,435	14,321	15,035.73	1.12%	3.49%	3.62%
<b>Total</b>	<b>1,194,443</b>	<b>1,230,105</b>	1,242,369.00	<b>11,040</b>	<b>36,867</b>	38,326.51	<b>0.92%</b>	<b>3.00%</b>	3.08%

**Factor 1 Findings**

Hampton Roads Transit (HRT) provides public transportation services to its six-member jurisdictions. The following data shown in Table 3 is provided using American Community Service (2015) information. The information in Table 3 details the number and percent of the population that speak English less than “very well.”

**Table 1 Language Spoken At Home By Language Proficiency for the Population 5 Years and Over for HRT Service Area (Source: U.S. Census Bureau, 2015 American Community Survey)**

	TOTAL			PERCENT OF POPULATION		
	Speaks English Well	Less Than Very Well	Total	Speaks English Well	Less Than Very Well	Total
English Only	1,127,507		1,248,567	90.30%	0.00%	90.30%
Spanish or Spanish Creole	36,995	16,466	53,461	2.96%	1.32%	4.28%
Tagalog	12,750	6,071	18,821	1.02%	0.49%	1.51%
German	4,469	772	5,241	0.36%	0.06%	0.42%
French (incl. Patois, Cajun)	4,127	1,025	5,152	0.33%	0.08%	0.41%
Chinese	2,083	2,748	4,831	0.17%	0.22%	0.39%
Vietnamese	1,630	2,204	3,834	0.13%	0.18%	0.31%
African languages	2,272	738	3,010	0.18%	0.06%	0.24%
Arabic	1,788	1,027	2,815	0.14%	0.08%	0.23%
Korean	1,050	1,584	2,634	0.08%	0.13%	0.21%
Japanese	1,381	610	1,991	0.11%	0.05%	0.16%
Italian	1,799	183	1,982	0.14%	0.01%	0.16%
Russian	1,005	582	1,587	0.08%	0.05%	0.13%
Other Indic languages	989	465	1,454	0.08%	0.04%	0.12%
Other Asian languages	824	399	1,223	0.07%	0.03%	0.10%
Other Pacific Island languages	741	465	1,206	0.06%	0.04%	0.10%
Greek	886	290	1,176	0.07%	0.02%	0.09%
Portuguese or Portuguese Creole	948	189	1,137	0.08%	0.02%	0.09%
Gujarati	728	344	1,072	0.06%	0.03%	0.09%

Persian	516	350	866	0.04%	0.03%	0.07%
Other Indo-European languages	638	208	846	0.05%	0.02%	0.07%
Urdu	653	173	826	0.05%	0.01%	0.07%
Mon-Khmer, Cambodian	550	267	817	0.04%	0.02%	0.07%
French Creole	600	72	672	0.05%	0.01%	0.05%
Hindi	434	236	670	0.03%	0.02%	0.05%
Scandinavian languages	522	42	564	0.04%	0.00%	0.05%
Other Slavic languages	461	102	563	0.04%	0.01%	0.05%
Other West Germanic languages	475	77	552	0.04%	0.01%	0.04%
Thai	204	268	472	0.02%	0.02%	0.04%
Hebrew	328	116	444	0.03%	0.01%	0.04%
Serbo-Croatian	266	134	400	0.02%	0.01%	0.03%
Polish	252	11	263	0.02%	0.00%	0.02%
Laotian	53	45	98	0.00%	0.00%	0.01%
Other Native North American languages	85	13	98	0.01%	0.00%	0.01%
Hungarian	76	4	80	0.01%	0.00%	0.01%
Armenian	58	19	77	0.00%	0.00%	0.01%
Other and unspecified languages	59	14	73	0.00%	0.00%	0.01%
Navajo	20	6	26	0.00%	0.00%	0.00%
Hmong	26	0	26	0.00%	0.00%	0.00%
Yiddish	0	0	0	0.00%	0.00%	0.00%
SUBTOTAL	1,210,248	38,319.00	1,369,627	96.93%	3.07%	100.00%
TOTAL	1,210,248					

## **Factor 2: Frequency with which LEP individuals come in contact with HRT programs, activities, or services**

Through the analysis of available Census data, the Factor 1 analysis identified LEP populations within the six-city HRT service area. The second step of the four-factor LEP needs assessment is an evaluation of the current frequency of contact between LEP individuals and HRT programs, activities, and services. The US DOT “Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons” (US DOT, 2005) advises that:

*“Recipients should assess, as accurately as possible, the frequency with which they have or should have contact with LEP individuals from different language groups seeking assistance, as the more frequent the contact, the more likely enhanced language services will be needed. The steps that are reasonable for a recipient that serves an LEP person on a one-time basis will be very different than those expected from a recipient that serves LEP persons daily.”*

HRT’s customer service department reports that 14 calls from Spanish language speakers requiring translation services were received in 2016. HRT has received no request for any other translation services during the 2011-2013 review periods.

## **Factor 3: Evaluation of Importance of HRT Services to the LEP Population**

Primary customer service requests are for schedule and route information. Most transit riders are regular users who use only a portion of the bus system for their daily travel, making routine trips, with little need for complex information. For those who are new to the system, in non-English speaking households, it is important to have language resources ready to enable them to be served. Hampton Roads Transit’s website [gohrt.com](http://gohrt.com) contains a language translator where basic information on routes, fares, and information that can be obtained and translated for LEP visitors. HRT also provides notification regarding the availability of language assistance through its Customer Service department.

The Factor 1 analysis showed that nearly 3.07% of the population in HRT’s service area is limited English proficiency, reporting that they speak English less than very well. While the Factor 2 analysis showed that the frequency of contact with HRT’s customer service center was limited, ensuring that all persons - regardless of language proficiency - have access to information on public transportation services and programs is an important element of a transit agency’s operating program. HRT currently offers translation services to those who call into their customer service line through a contracted translation call center.

## **Factor 4: Available Resources and Cost of Language Assistance Services**

The last step in the four-factor LEP needs assessment is intended to determine the demand for language assistance, including the needs identified in the Factor 3 analysis, with HRT’s current and projected financial and personnel resources. The Factor 4 analysis identifies current language assistance measures and associated costs. HRT recognizes the importance of providing language assistance to the LEP populations. The most cost-effective language assistance can be provided orally through interpretation services. HRT has an agreement with Certified Languages International (CLI), LLC for telephone translation services. CLI offers exceptional customer satisfaction, is Safe Harbor certified, provides reporting and call analytics, and professional interpreters with industry-specific expertise.

Training: Hampton Roads Transit offers training for all new hires regarding Title VI and LEP populations. The Customer Service Department, which is responsible for the Call Center, will be trained on directing LEP callers and walk-in customers to the “Language Line” phone line for interpretation services. Customer Service personnel are trained on how to offer services to LEP populations for those who contact HRT regarding related assistance. The staffs of the Planning & Development and Marketing & Communications departments should be familiarized with the LEP plan, with particular emphasis on LEP outreach efforts at public meetings and outreach events.

Providing Notice to LEP Persons: HRT notifies the public of the alternative language services that are available in material and information distributed.

Monitoring and Updating HRT’s LEP Plan: HRT will review its LEP Plan at least every three years. Information gathered in this review will be used to update the LEP Plan, no less often than every three years to coincide with HRT’s submission of its Title VI Program Update.

Hampton Roads Transit staff monitors its language access plan utilizing its Limited English Proficiency Plan (LEPP). HRT follows its Title VI Program update schedule for the LEP Plan. The LEPP provides current measures used by HRT to assist LEP populations including:

- Monitoring of the current LEP population in the Hampton Roads Transit service area.
- Outreach and engagement activities, identifying if there are any additional types of language services needed.
- Identification if there are there any programs that should be identified or included for language assistance services?
- Monitoring of HRT’s available resources, such as communication tools, technology, staff, and financial resources.
- Were complaints from LEP persons received?

As part of the monitoring and update plan, the HRT will track the activity of usage of its services by LEP persons and requests for assistance from Customer Service and Operations departments. A record of information from passenger surveys which identifies the language spoken by passengers will also be updated as the agency’s resources allow; including through its Origin & Destination survey.

## 2.5 Current Measures

Current measures in place to assist with LEP populations include:

- HRT’s current Customer Service Call Center Translation Services that provide translation services on a per-call basis.
- The use of Census Bureau’s “*I Speak*” cards at workshop or conference sign-in sheet tables, as well as HRT’s reception area.
- Spanish language assistance notification on newspaper ads for public meetings.

In accordance with the Safe Harbor Provision referenced in FTA Circular C 4702.1B, transit agencies must provide a list of documents which will be translated into the languages of frequently encountered LEP populations. HRT will provide the following documents:



- [Title VI Notice](#)
- [Title VI Complaint Form](#)
- [Title VI Complaint Procedures](#)
- [Hampton Roads Transit Website \(Google Translate\)](#)
- [How-to-Ride Guide](#)

**HRT LEP Measures and Status**

Measure	Description	Status	Estimated Burden	Resources Available (Y/N)		
				Staff	Financial	Technological
A	Identify an LEP coordinator	In Progress	Low	Y	Y	Y
B	Examine possibility of establishing a Title VI/LEP group that could meet quarterly to review LEP/Title VI needs and activities	In Progress	Medium	Y	Y	Y
C	Coordinate with HRT operations staff to better identify LEP-related activity on-board the buses and impact on drivers, if any.	Not Started	Medium	Y	Y	Y
D	Document LEP requests—both customer service calls and outreach activities.	In Progress	Low	Y	Y	Y
E	Monitor requests/calls to customer service to see if there is a need to include a “For Spanish, press...” option.	In Progress	Low	Y	Y	Y
F	Coordinate with IT department to identify whether the addition of a “For Spanish, press...” option is a possibility	Not Started	Medium	Unknown	Unknown	Unknown
G	Coordinate with the HRPDC/HRTPO in their efforts to establish a Hampton Roads Limited English Proficiency (LEP) Employee Guide and a database of community groups and local agencies that work with LEP populations and identify volunteer translators and interpreters.	Not Started	Medium to High	Y	Y	Y
H	Post a notice of available language assistance in HRT’s reception area and website.	Finished	Low	Y	Y	Y
I	Examine possibility of adding an online language translation feature to HRT’s website.	In Progress	Low	Y	Y	Y
J	Add a statement when running general public meeting notices: “The HRT will strive to provide reasonable accommodations and services for persons who require special assistance to participate in this public involvement opportunity. Para información en español, llame al (757).....”	In Progress	Low	Y	Y	Y
K	Examine possibility of creating information in other languages, primarily in Spanish. For example, the “How to Ride the Bus” guide that has important information (fares, policies) related to HRT’s service could be a key first document	Not Started	High	N	N	Y
L	Cards placed inside buses listing who to contact if information is needed in other languages (Spanish).	In Progress	Low	Y	Y	Y
M	Add questions in Spanish to rider surveys to better gauge amount/frequency of LEP communities using HRT services.	Not Started	Medium	Y	N	Y
N	Conduct training/informational sessions with HRT customer service department regarding LEP and Title VI populations. Training topics will include:	Not Started	Medium	Y	Y	Y
N1	Understanding Title VI of the Civil Rights Act of 1964 and LEP responsibilities.					
N2	LEP program responsibilities and obligations.					
N3	Language assistance services offered.					
N4	Use of LEP Language Assistance Cards (“I Speak Cards”).					
N5	Documentation of language assistance requests.					

## REFERENCES

- Federal Transit Administration (FTA). 2007a. *Circular 4702.1A: Title VI and Title VI-Dependent Guidelines for Federal Transit Administration Recipients*.
- . 2007b. *Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers*.
- U.S. Department of Transportation (USDOT). 2005. *Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons*. 70 *Federal Register* 74087. December 14, 2005.
- The White House. 2000. *Executive Order 13166. Improving Access to Services for Persons with Limited English Proficiency*. August 11, 2000.

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## APPENDIX C: BOARD AND COMMITTEE MEMBERS

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Tables showing all current board and committee members are provided below.

**TABLE 1: RACIAL COMPOSITION OF TDCHR BOARD MEMBERS**

City/Position	Race/Ethnicity
Chesapeake	Caucasian
Chesapeake	Caucasian
Hampton	African-American
Hampton	African-American
Newport News	Caucasian
Newport News	Caucasian
Norfolk	Caucasian
Norfolk	Caucasian
Virginia Beach	African-American
Virginia Beach	African-American
Portsmouth	Caucasian
Portsmouth	African-American
Virginia Department of Rail and Public Transportation	Caucasian

**TABLE 2: RACIAL COMPOSITION OF TRANSIT RIDERS ADVISORY COMMITTEE**

City/Position	Race/Ethnicity
Hampton	African-American
Hampton	African-American
Norfolk	Caucasian
Norfolk	African-American
Portsmouth/Vice Chair	African-American
Portsmouth	Vacant
Chesapeake	African-American
Chesapeake	African-American
Virginia Beach/Chair	African-American
Virginia Beach	Vacant
Newport News	Caucasian
Newport News	African-American

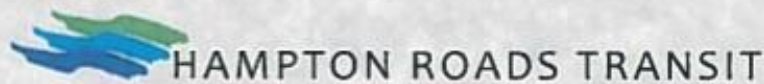
**TABLE 3: RACIAL COMPOSITION OF ADVISORY COMMITTEE FOR PERSONS WITH DISABILITIES**

<b>City</b>	<b>Consumer/Provider</b>	<b>Race/Ethnicity</b>
Chesapeake	Consumer	Vacant
Chesapeake	Consumer	Vacant
Chesapeake	Provider	Caucasian
Hampton	Consumer	African-American
Hampton	Consumer	African-American
Hampton	Provider	African-American
Newport News	Consumer	African-American
Newport News	Consumer	African-American
Newport News	Provider	African-American
Norfolk	Consumer	Caucasian
Norfolk	Consumer	African-American
Norfolk	Provider	Caucasian
Portsmouth	Consumer	African-American
Portsmouth	Consumer	African-American
Portsmouth	Provider	Vacant
Virginia Beach	Consumer	Hispanic
Virginia Beach	Consumer	Caucasian
Virginia Beach	Provider	Caucasian
Extra Member Norfolk	Consumer	Caucasian
Extra Member Hampton	Consumer	African-American
Extra Member		Vacant

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## APPENDIX D: COMMISSION RESOLUTION - TDCHR

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### Resolution 03 – 2020 – Title VI Program

**A Resolution of the Transportation District Commission of Hampton Roads adopting the  
*Hampton Roads Transit 2020 Title VI Program***

**WHEREAS**, pursuant to Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq. and 23 CFR part 21, the U.S. Department of Transportation and the Federal Transit Administration (FTA) prohibit discrimination on the basis of race, color or national origin; and

**WHEREAS**, Hampton Roads Transit (HRT) operates public transportation service, including; bus, light rail, ferry, vanpool, and paratransit services; and

**WHEREAS**, HRT receives FTA funding to operate public transportation services and is, therefore, required to demonstrate compliance with such federal laws and regulations by submitting a Title VI program update once every three years; and

**WHEREAS**, HRT seeks to ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner; and

**WHEREAS**, HRT seeks to promote full and fair participation in public transportation decision-making without regard to race, color, or national origin; and

**WHEREAS**, HRT seeks to ensure meaningful access to transit-related programs and activities by persons with limited English proficiency; and

**WHEREAS**, pursuant to federal laws and regulations, the HRT Title VI Program must be considered and approved by the HRT Governing Board; and

**WHEREAS**, an inclusive public participation process, consistent with federal requirements and HRT policies, was undertaken prior to Board consideration of the Title VI Program update; and

**WHEREAS**, revisions have been made to the Hampton Roads Transit 2017 Title VI Program to reflect recent changes in federal laws and regulations, and to reflect changes in HRT's operations since the last update, all of which is detailed in the *Hampton Roads Transit 2020 Title VI Program*;

**WHEREAS**, the Commission has specifically considered and is aware of the following new and updated information and provisions contained in the *Hampton Roads Transit 2017 Title VI Program*:

- Title VI Program population data, statistics, and mapping

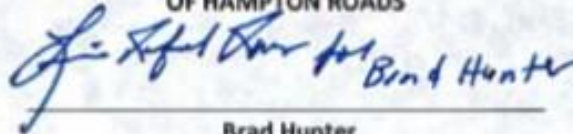


- Program material notices and related information
- Title VI Complaint Procedures and Form
- Service Standards and Policies
- Passenger Amenities Policy
- Public Involvement Process
- Service Monitoring criteria; and

**NOW, THEREFORE, BE IT RESOLVED** that the Transportation District Commission of Hampton Roads adopts the attached *Hampton Roads Transit 2020 Title VI Program*.

**APPROVED and ADOPTED** by the Transportation District Commission of Hampton Roads at its meeting on the 25<sup>th</sup> day of June 2020.

TRANSPORTATION DISTRICT COMMISSION  
OF HAMPTON ROADS



Brad Hunter  
Chairman

ATTEST:



Luis R. Ramos  
Commission Secretary

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## APPENDIX E: DETAILED VEHICLE ASSIGNMENT

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A detailed table of assignments of vehicle size by route is shown below. Routes are grouped by bus length requirement.

**TABLE 4: BASE ASSIGNMENT OF VEHICLE SIZE BY ROUTE, OCTOBER 2019 SERVICE BOARD**

Route	Peak Buses	Bus Length
<b>4 Church St.</b>	1	29
<b>5 Willoughby</b>	1	29
<b>9 Sewells Point Rd.</b>	6	29
<b>11 Colonial Ave.</b>	1	29
<b>18 Ballentine Pl.</b>	3	29
<b>22 Haygood</b>	2	29
<b>24 Kempsville</b>	5	29
<b>25 Newtown Rd.</b>	2	29
<b>26 Lynnhaven Mall</b>	3	29
<b>27 Northampton Blvd.</b>	2	29
<b>29 Great Neck Rd./Lynnhaven Pkwy.</b>	3	29
<b>33 General Booth Blvd.</b>	5	29
<b>43 Parkview</b>	1	29
<b>50 Academy Pk.</b>	1	29
<b>55 Crossways Blvd.</b>	1	29
<b>102 Queen Street</b>	1	29

Route	Peak Buses	Bus Length
108 Warwick/Lee Hall	4	29
115 Fox Hill Rd.	1	29
116 Mall Hall Loop	3	29
120 Mallory	1	29
121 Williamsburg	1	29
<b>Subtotal 29 Ft</b>	<b>48</b>	
2 Hampton Blvd	4	35
6 South Norfolk	3	35
8 Tidewater Dr.	4	35
12 Indian River Rd.	2	35
13 Campostella Rd.	3	35
14 Battlefield Blvd	3	35
36 Holland Rd.	4	35
41 Craddock	2	35
44 Midtown	3	35
47 Churchland	11	35
57 Deep Creek	5	35
58 Bainbridge Blvd.	1	35
64 Smithfield	2	35
101 Kecoughtan	3	35
103 Shell Rd.	3	35
104 Newsome Pk.	3	35
105 Briarfield Rd.	2	35
109 Buckroe	1	35
110 Thomas Nelson	4	35
111 Riverside	4	35
117 Phoebus	0	35
118 Magruder	2	35
405 Peninsula Commuter Service	0	35
414 Peninsula Commuter Service	2	35
<b>Subtotal 35 Ft</b>	<b>71</b>	

<b>1 Granby St.</b>	10	40
<b>3 Chesapeake Blvd.</b>	7	40
<b>15 Military Hwy.</b>	9	40
<b>20 Virginia Beach Blvd.</b>	19	40
<b>21 Little Creek Rd.</b>	5	40
<b>23 Princess Anne Rd.</b>	5	40
<b>45 Portsmouth</b>	8	40 (ERC)
<b>106 Warwick Blvd.</b>	3	40
<b>107 Denbigh Blvd.</b>	4	40
<b>112 Jefferson Ave.</b>	4	40
<b>114 Mercury Blvd.</b>	4	40
<b>415 Peninsula Commuter Service</b>	0	40
<b>430 Peninsula Commuter Service</b>	0	40
<b>Subtotal 40 Ft</b>	<b>78</b>	
<b>919 MAX Silverleaf Station</b>	4	Coach
<b>922 MAX Indian River / Greenbrier</b>	3	Coach
<b>960 MAX Norfolk to Virginia Beach</b>	2	Coach
<b>961 MAX Crossroads</b>	8	Coach
<b>966 MAX Silver to NNSY</b>	2	Coach
<b>967 MAX Indian River PnR</b>	7	Coach
<b>972 MAX TCC to NNSY</b>	1	Coach
<b>Subtotal Coaches</b>	<b>27</b>	
<b>Total</b>	<b>224</b>	

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## APPENDIX F: ROUTE MINORITY/LOW-INCOME STATUS

The table below shows the minority/low-income status of all routes. This data is based on American Community Survey data.

Blue highlighting indicates the route is considered a minority route and yellow highlighting indicates that the route is a low-income route. A 33% threshold was used per Section 4.4 of this document.

**TABLE 5: MINORITY/LOW-INCOME STATUS OF FIXED-ROUTES**

Route	% Minority	% Low-Income		Route	% Minority	% Low-Income
1	38.80%	24.25%		58	51.63%	27.83%
2	39.87%	35.04%		64	75.88%	42.83%
3	56.47%	30.56%		90	50.30%	27.05%
4	61.01%	51.50%		101	74.45%	35.51%
5	41.37%	24.05%		102	72.15%	33.25%
6	71.63%	38.17%		103	82.82%	41.09%
8	69.28%	39.12%		104	82.84%	46.89%
9	76.75%	33.87%		105	82.53%	38.80%
11	48.17%	33.53%		106	56.14%	31.78%
12	53.91%	21.41%		107	54.72%	31.66%
13	81.40%	44.51%		108	64.98%	31.78%
14	41.33%	16.05%		109	58.28%	29.97%
15	61.25%	21.36%		110	68.60%	27.94%
18	82.89%	42.34%		111	46.68%	23.44%
20	51.87%	28.60%		112	55.42%	30.22%
21	50.93%	25.85%		114	66.54%	30.91%
22	45.96%	20.62%		115	50.13%	26.78%
23	60.70%	31.71%		116	48.52%	22.53%
24	37.83%	13.01%		117	80.22%	54.14%
25	43.87%	15.38%		118	68.40%	29.51%
26	54.00%	16.36%		120	58.65%	36.12%
27	47.72%	22.04%		121	56.69%	28.04%
29	20.16%	12.76%		403	66.54%	34.43%
30	14.67%	20.09%		405	59.25%	26.98%
31	18.69%	14.54%		414	55.86%	27.79%
33	24.94%	12.98%		415	58.19%	32.76%
35	10.82%	10.90%		430	55.91%	29.29%
36	48.18%	14.72%		801	55.17%	27.71%
41	76.07%	30.43%		919	33.90%	24.24%
43	61.35%	31.83%		922	37.50%	21.97%

44	51.33%	30.50%		960	40.19%	29.31%
45	67.95%	36.05%		961	57.01%	33.98%
47	60.92%	28.40%		966	52.37%	22.56%
50	75.83%	39.90%		967	55.07%	21.41%
55	50.77%	12.94%		972	59.79%	23.39%
57	56.19%	27.39%				

(Census and American Community Survey Data)



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## APPENDIX G: VEHICLE LOAD ANALYSIS

FIGURE 5: AVERAGE OBSERVED VEHICLE LOAD BY ROUTE FROM NOVEMBER 2013 SURVEY

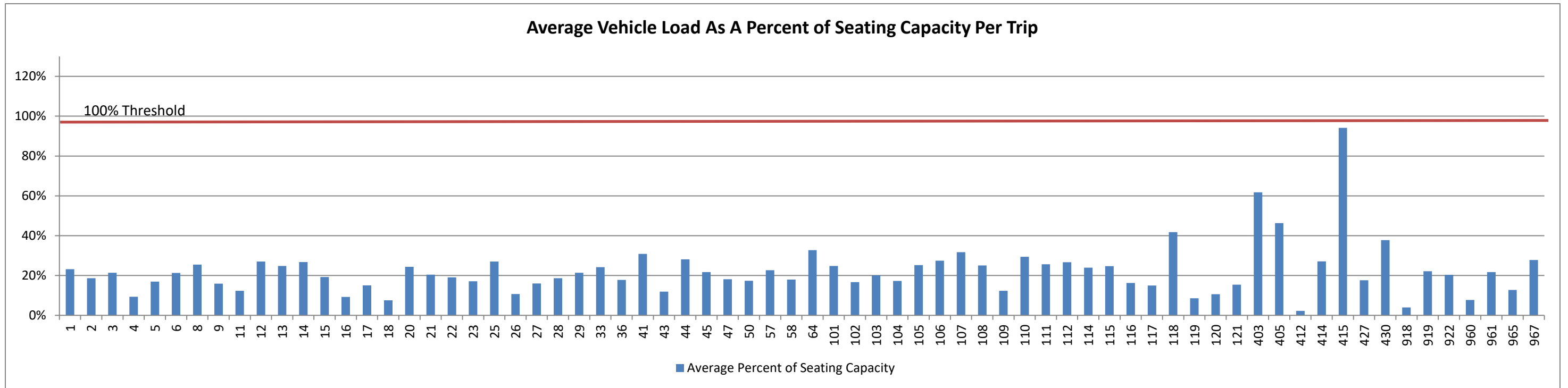
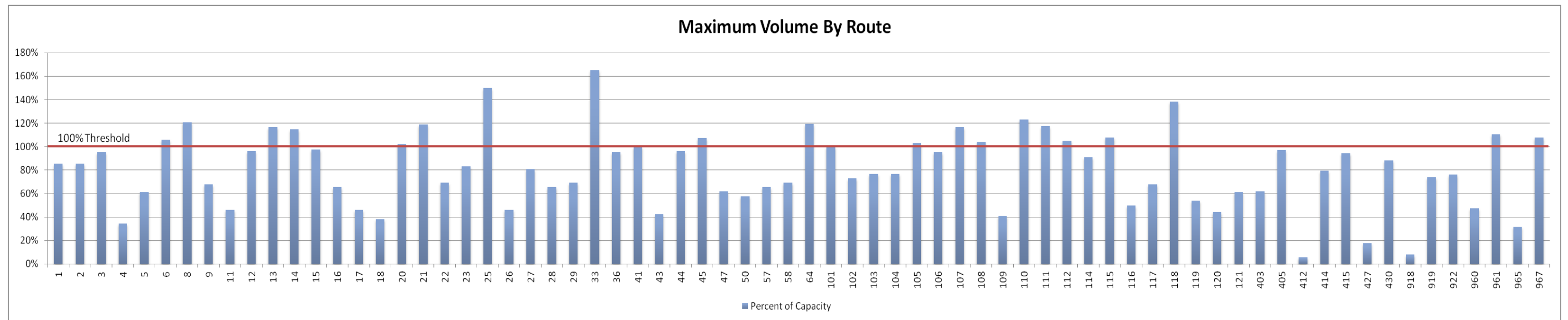


FIGURE 6: MAXIMUM OBSERVED VEHICLE LOAD BY ROUTE FROM NOVEMBER 2013 SURVEY



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## APPENDIX H: SERVICE CHANGE ANALYSES 2017-2019

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The following pages include the Service Equity Analysis completed in 2017-2019:

SERVICE CHANGE	IMPLEMENTATION DATE
SUMMER 2017	6/21/2017
FEBRUARY/JUNE 2018	2/16/2018 6/7/2018
OCTOBER 2018	10/21/2018 10/22/2018
OCTOBER 2019	10/21/2019

# **TITLE VI ANALYSIS**

## **PROPOSED SERVICE CHANGES** **JULY 2017**

## TITLE VI EQUITY ANALYSIS - PROPOSED SERVICE CHANGES: JULY 2017

### INTRODUCTION

Hampton Roads Transit has recommended various service changes for the Summer 2017 Service Board, including:

- Reduction of service on Routes 2, 21, 112, and 119
- Creation of Pilot Wave Route 35

As required by HRT's Title VI Program a Title VI Equity Analysis has been performed for the routes identified above. The results of this Analysis find that there is no disparate impact for Title VI populations and no disparate burden for low-income populations. In accordance with HRT's Public Participation Plan, HRT staff will perform public engagement and outreach activities to notify the public of the service elimination.

### TITLE VI PROGRAM OVERVIEW

#### TITLE VI

Title VI of the Civil Rights Act of 1964 provides that no person shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

#### EXECUTIVE ORDER 12898

Executive Order (EO) 12898 "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" directs Federal agencies to achieve "environmental justice...by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."

#### HRT TITLE VI PROGRAM

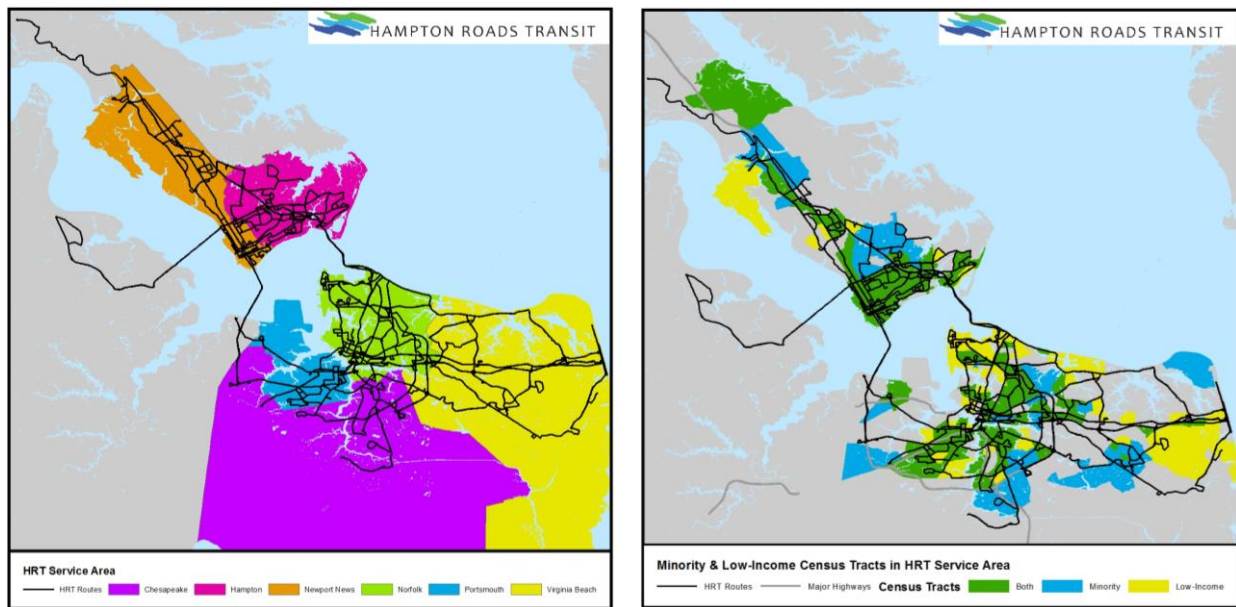
The Federal Transit Administration (FTA) provides guidance to recipients of federal funding to incorporate both Title VI and Environmental Justice (EJ) into their public transportation decision-making. FTA requires recipients to evaluate service, fare changes, and proposed improvements at the planning and programming stages, in order to determine whether those changes have a discriminatory effect through disparate impact or disproportionate burdens to minority and/or low-income populations, respectively. For service changes, this requirement applies to "major service changes" only. Per Hampton Roads Transit (HRT) 2014 Title VI Program:

- Major Service Change - a change of 25% or more of transit vehicle miles or service hours for a route within the HRT service area.
- HRT service area - the Cities of Chesapeake, Hampton, Newport News, Norfolk, Portsmouth, and Virginia Beach. A map of the service area is provided in Figure 1.
- Minority Population - The total minority population as defined in the US 2010 Census is 47% of the total population by census tract and land area within the HRT service area. The total minority ridership for the HRT system based on the 2014 Origin and Destination Survey is 81% of the total HRT System Ridership.

- “Low-Income Population” - persons living at or below 150% of the poverty line in HRT’s service area. The total low-income population as identified by the 2011 American Community Survey is approximately 19% of the total population by census tract and land area within the HRT service area. The total low-income ridership for the HRT system based on the 2014 Origin and Destination Survey is 62% of the total HRT System Ridership.
- Determination of whether a proposed Major Service Change has either disparate or disproportionate impact is based on whether the percentage of minority and/or low-income passengers on an affected transit route (bus or fixed guideway) is greater than five (5) percentage points of the transit system’s percentage of minority and/or low-income riders.

The following maps identify the HRT service area, HRT routes, and Census tracts with minority and low-income populations greater than the service area average. This information provides a baseline for the analysis of all proposed major service changes.

**FIGURE 1: CENSUS TRACTS – MINORITY & LOW INCOME POPULATIONS**



### PROPOSED MAJOR SERVICE CHANGE POLICY

Changes to the routes 2, 21, 112, 119, and 35 are being considered for July 2017. Changes to Routes 35 and 119 exceed the 25% Major Service Change Threshold. The Title VI Equity Analysis for Routes 35 and 119 reviews the proposed service change for; potential disparate impacts or disproportionate burden on minority or low-income populations, to provide justification for and reasonable alternatives to the proposed action, and to identify mitigation to avoid or minimize any disparate or disproportionate impact, if identified.

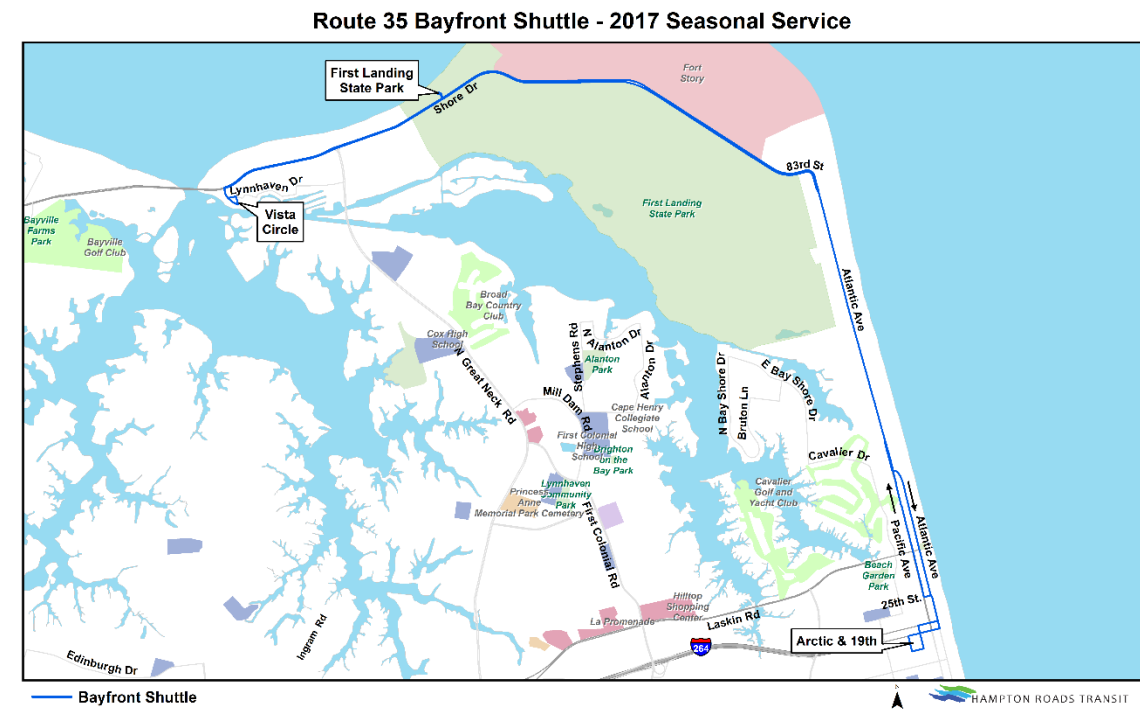
### PROPOSED SERVICE CHANGE: (NEW) PILOT WAVE ROUTE 35

Route 35 will provide seasonal service (May 21<sup>st</sup> through October 1<sup>st</sup>) between Arctic Avenue/19<sup>th</sup> Street and Vista Circle in Virginia Beach. Route 35 will service the Oceanfront, First Landing State Park, North End beaches, Chesapeake Bay beaches and Bayfront restaurants on Shore Drive. Daily service will be provided every 45 minutes from 8:00 am to midnight.

### RECOMMENDATION

The City of Virginia Beach has recommended the creation of Pilot Wave Route 35 to connect the Oceanfront and Bayfront areas. HRT concurs with the implementation of the Wave Pilot Program.

**FIGURE 1: PILOT ROUTE 35**





### DETERMINATION OF IMPACTS

The following tables show the proportion of the minority and low-income persons impacted by the proposed elimination of Sunday service of Route 35. HRT’s Title VI Program states that if the percentage of minorities potentially affected by an action is greater than 5% the service area average, then the service change may have a disparate impact. If the percentage of low-income people potentially affected by an action is greater than 5% of the system area average, then the service change may have a disproportionate impact. HRT service area characteristics and the characteristics of the Route 35 were determined using Census data from the American Community Survey. Because the Route 35 is a pilot route, ridership information is unavailable at this time.

**TABLE 2: MINORITY AND LOW-INCOME POPULATIONS WITHIN SERVICE AREA**

	HRT SERVICE AREA (2011 ACS)	ROUTE 35 SERVICE AREA (2011 ACS)	HRT RIDERS (2014 O&D)	ROUTE 35 RIDERS
MINORITY	47%	10%	81%	Unknown- new route
LOW-INCOME	19%	23%	62%	Unknown- new route

The impact to the those within the service area of the Route 35 service area is greater than the 5% threshold for minority populations, with a 37% difference. However, the percentage of minority residents in the Route 35 service area is lower than the HRT service area. This suggests that the Route 35 will not generate disparate impacts to minority populations.

### PUBLIC INVOLVEMENT AND MITIGATION

The creation of Pilot Route 35 will not generate a disparate impact or disproportionate burden. Public Outreach will engage this part of the service area to communicate with customers and stakeholders; including resort area businesses, retail centers, and civic associations. Because the Route 35 is a new seasonal service, the public outreach strategy will consist of traditional and non-traditional methods of outreach and communication. This includes, but is not limited to promotion via social media, website, communication at local meetings where individuals/groups may be impacted by this change.

**PROPOSED SERVICE CHANGE: ROUTE 119**

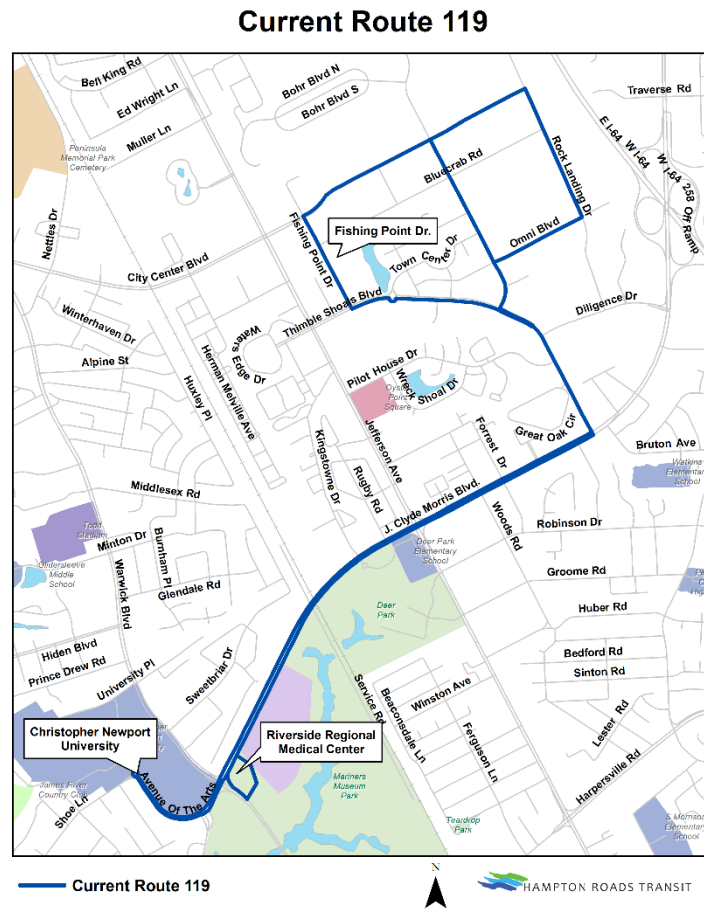
Route 119 provides daily service between Fishing Point (City Center) and Riverside Hospital with a stop at Christopher Newport University. Connections are made at Fishing Point with Routes 111 and 112. Connections are also made at Riverside Hospital with Routes 106 and 107. Route 119 operates hourly service daily.

**TABLE 1: ROUTE 32 RIDERSHIP**

	WEEKDAY	SATURDAY	SUNDAY
AVERAGE DAILY RIDERSHIP	136	31	19
PASSENGERS PER TRIP	8	2	1

**RECOMMENDATION**

HRT recommended the elimination of Saturday and Sunday services on the Route 119 due to low ridership to the City of Newport News. HRT's Service Standards and Performance policy assess route efficiency, effectiveness and quality of service. <minimum performance thresholds before a local route is 10 or fewer passengers for route, this averaging 2>

**FIGURE 2: ROUTE 119**


### **DETERMINATION OF IMPACTS**

The following tables show the proportion of the minority and low-income persons impacted by the proposed elimination of Sunday service of Route 119. HRT’s Title VI Program states that if the percentage of minorities potentially affected by an action is greater than 5% the service area average, then the service change may have a disparate impact. If the percentage of low-income people potentially affected by an action is greater than 5% of the system area average, then the service change may have a disproportionate impact. HRT service area characteristics and the characteristics of the Route 119 were determined using Census data from the 2011 American Community Survey and 2014 Origin and Destination Survey Data.

**TABLE 2: MINORITY AND LOW-INCOME POPULATIONS WITHIN SERVICE AREA**

	HRT SERVICE AREA (2011 ACS)	ROUTE 119 SERVICE AREA (2011 ACS)	HRT RIDERS (2014 O&D)	ROUTE 119 RIDERS (2014 O&D SURVEY)
MINORITY	47%	43%	81%	89.7%
LOW-INCOME	19%	23%	62%	60.0%

The impact to those within the service area of the Route 119 service area is not greater than the 5% threshold for minority populations, with a 5% difference. The percentage of minorities identified in the Route 119 service area is lower than the HRT service area. In accordance with HRT’s policy, this suggests that the Route 119 will not generate disparate impacts or disproportionate burden to minority populations.

### **PUBLIC INVOLVEMENT AND MITIGATION**

Public Outreach will engage this part of the service area to communicate with customers and stakeholders. The public outreach strategy will consist of traditional and non-traditional methods of outreach and communication. As required by HRT’s Public Participation Plan, a plan has been crafted that identifies the public and community’s engagement as it relates to the elimination of the Route 119. This includes, but is not limited to promotion via social media, website, communication at local meetings where individuals/groups may be impacted by this change.

# **TITLE VI ANALYSIS**

## **PROPOSED SERVICE CHANGES JUNE 2018**

**TITLE VI, ENVIRONMENTAL JUSTICE, AND LIMITED ENGLISH PROFICIENCY**  
**ANALYSIS OF PROPOSED SERVICE CHANGES:**  
**JUNE 2018**

**TITLE VI PROGRAM OVERVIEW**

TITLE VI

Title VI of the Civil Rights Act of 1964 provides that no person shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

EXECUTIVE ORDER 12898

Executive Order (EO) 12898 “Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations” directs Federal agencies to achieve “environmental justice...by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.”

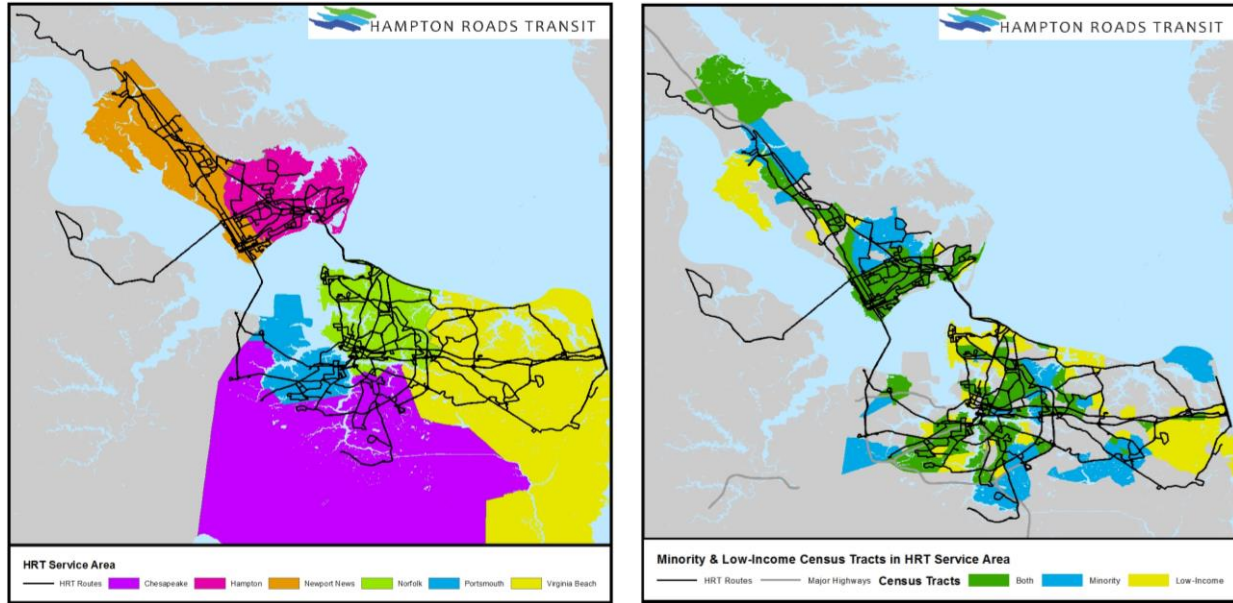
HRT TITLE VI PROGRAM

The Federal Transit Administration (FTA) provides guidance to recipients of federal funding to incorporate both Title VI and Environmental Justice (EJ) into their public transportation decision- making. FTA requires recipients to evaluate service, fare changes, and proposed improvements at the planning and programming stages, in order to determine whether those changes have a discriminatory effect through disparate impact or disproportionate burdens to minority and/or low-income populations, respectively. For service changes, this requirement applies to “major service changes” only. Per Hampton Roads Transit (HRT) Title VI Policy:

- Major Service Change - a change of 25% or more of transit vehicle miles or service hours for a route within the HRT service area.
- HRT service area - the cities of Chesapeake, Hampton, Newport News, Norfolk, Portsmouth, and Virginia Beach. A map of the service area is provided in Figure 1.
- Minority Population - The total minority population as defined in the US 2010 Census – ACS 2014 is 47.1% of the total population by census tract and land area within the HRT service area. The total minority ridership for the HRT system based on the 2016 Origin and Destination Survey is 72.6% of the total HRT System Ridership.
- “Low-Income Population” - persons living at or below 150% of the poverty line in HRT’s service area. The total low-income population as identified by the 2015 American Community Survey is approximately 20.5% of the total population by census tract and land area within the HRT service area. The total low-income ridership for the HRT system based on the 2016 Origin and Destination Survey Ridership Survey is 69.3% of the total HRT System Ridership.
- Determination of whether a proposed Major Service Change has either disparate or disproportionate impact is based on whether the percentage of minority and/or low-income passengers on an affected transit route (bus or fixed guideway) is greater than five (5) percentage points of the transit system’s percentage of minority and/or low-income riders. Ridership data is the preferred data source; census counts by tract data is used when ridership data is not available or applicable.

The following layered maps identify the HRT routes, HRT service area and Census tracts with total minority and low-income populations greater than the service area average. This information provides a baseline for the analysis of all proposed major service changes.

**CENSUS TRACTS – MINORITY & LOW-INCOME POPULATIONS**



**PROPOSED MAJOR SERVICE CHANGE POLICY**

The proposed routes whose service by enhancement, reduction or elimination identified as major service changes are as follows:

- **MAX Route 965**

Changes to the Metro Area Express (The MAX) Routes listed above are being considered for June 2018. Changes to the aforementioned routes exceed the 25% Major Service Change Threshold as identified in Hampton Roads Transit Title VI Program. The Title VI Equity Analysis for MAX 965 review the proposed service changes for; potential disparate impacts minority populations. The review of these route changes also analyzes if there is a disproportionate burden on minority and/or low-income populations. If a disparate impact or disproportionate burden is identified Hampton Roads Transit is required to provide justification for and reasonable alternatives to the proposed action, and to identify mitigation to avoid or minimize any disparate or disproportionate impact.

It is HRT’s policy to use Census data and Origin and Destination survey data to analyze Title VI impacts of major service changes whenever that data is available. Data from the U.S. Census – 2014 American Community Survey (ACS) and the HRT system-wide survey data from its 2016 Origin & Destination Study was used for this equity analysis.

# **MAX ROUTE 965:**

## **PATRICK HENRY MALL – NAVAL STATION NORFOLK**

**MAX Route 965: (Patrick Henry Mall – Naval Station Norfolk)**

MAX Route 965 (Patrick Henry Mall – Naval Station Norfolk) currently provides service Monday through Friday between Patrick Henry Mall and Naval Station Norfolk with a stop at Peninsula Town Center (Coliseum and Pine Chapel). Two trips are provided between 5:15 AM and 7:38 AM, and two trips are provided in the afternoon in the afternoon between 2:45 PM and 5:15 PM.

The reduction/elimination of service is above the Major Service Change Threshold of 25% and therefore a Title VI Analysis is required.

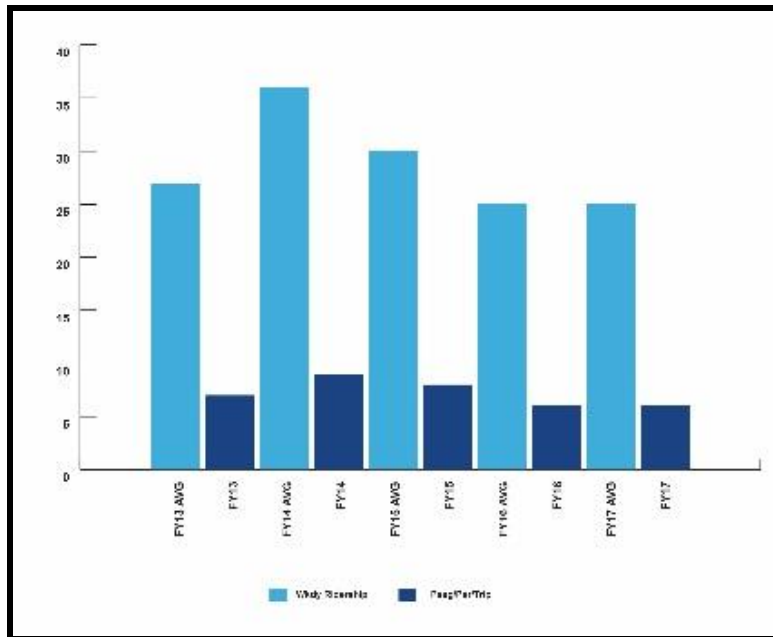
**SERVICE RECOMMENDATION AND JUSTIFICATION**

The recommendation is to discontinue a portion of the trips on the service is due to low route productivity/ridership on those individual trips, and those trips not meeting the required performance standards for MAX service as identified in Hampton Roads Transit’s Service Standards and Performance Policy (PD-112). For MAX service the minimum passenger per boarding for a one-way trip is 20 passengers. The recommended change would be effective February 2018 (*updated/postponed to June 2018*).

**TABLE 4A: ROUTE 965 RIDERSHIP**

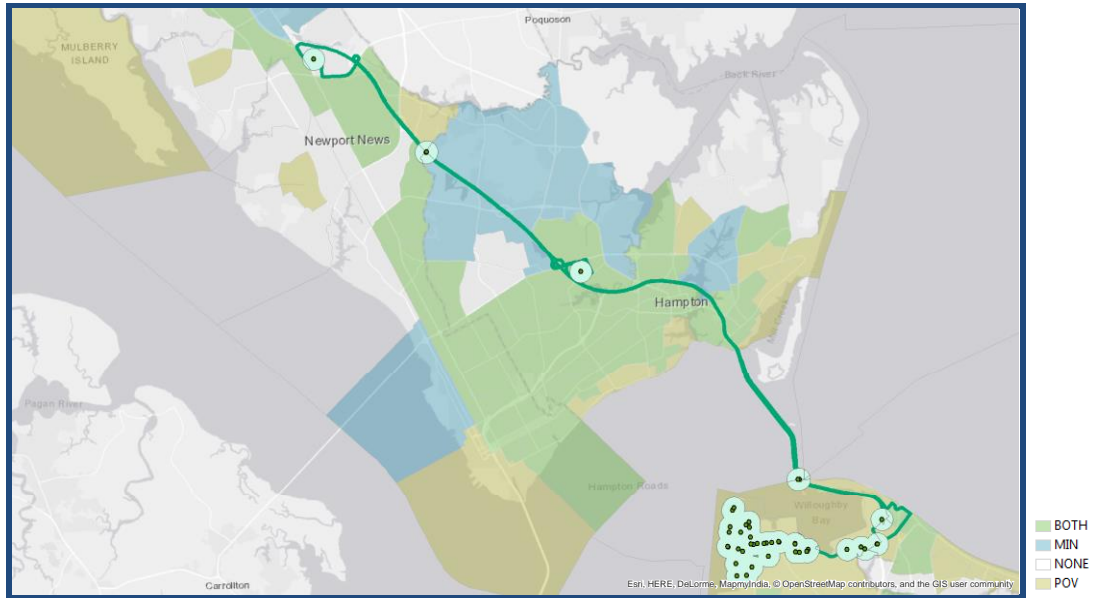
TRIP TIMES	PASSENGERS PER TRIP
5:15 A.M.	7
6:15 A.M.	6
2:45 P.M.	10
3:45 P.M.	12

**FIGURE 4A: MAX ROUTE 965 PERFORMANCE DATA**





**FIGURE 4B: MAX ROUTE 965 MINORITY & LOW-INCOME CENSUS TRACTS MAP**



### DETERMINATION OF IMPACTS – MAX ROUTE 965

The following tables show the proportion of the minority and low-income persons impacted by the proposed reduction of service of the MAX Route 965. HRT’s Title VI Program states that if the percentage of minorities potentially affected by an action is greater than 5% the service area average, then the service change may have a disparate impact. If the percentage of low-income people potentially affected by an action is greater than 5% of the system area average, then the service change may have a disproportionate impact. If the percentage of low-income people potentially affected by an action is greater than 5% of the system area average, then the service change may have a disproportionate burden. HRT service area characteristics and the characteristics of the Route 965 were evaluated using 2014 ACS Census data and 2016 Origin and Destination Survey Data. Both Census and Origin and Destination data were utilized for this Title VI analysis. MAX services are commuter services and evaluating both data sources due to the population that utilize the service and information captured by the Origin & Destination specific to MAX service survey results was warranted.

**TABLE 4: MINORITY AND LOW-INCOME POPULATIONS WITHIN SERVICE AREA**

	<b>HRT SERVICE AREA CENSUS</b>	<b>MAX RTE. 965 SERVICE AREA CENSUS</b>		<b>HRT RIDERS O&amp;D SURVEY</b>	<b>MAX RIDERS O&amp;D SURVEY</b>	<b>MAX RTE. 965 RIDERS O&amp;D SURVEY</b>
<b>MINORITY</b>	47.1%	42.5%		73.4%	48.9%	47.7%
<b>LOW-INCOME</b>	20.5%	62.75%		69.4%	45.6%	100%

<b>DATA SOURCE/ TITLE VI POPULATION</b>	<b>ANALYSIS FINDINGS</b>
CENSUS ANALYSIS MINORITY POPULATIONS	The impact to the service area is less than the 5% threshold for minority populations utilizing Census data, at -4.6%.
O&D ANALYSIS MINORITY POPULATIONS	The impact to the service area is greater than the 5% threshold for minority populations utilizing O&D survey data, by -24.5% for MAX services and -25.7% utilizing O&D data for MAX Route 965.
CENSUS ANALYSIS LOW-INCOME POPULATIONS	The impact to the service area is greater than the 5% threshold for low-income populations utilizing Census data, by 42.5%.
O&D ANALYSIS LOW-INCOME POPULATIONS	The impact to the service area is greater than the 5% threshold for low-income populations utilizing O&D survey data, by -23.8% for MAX services and 30.6% utilizing O&D data for MAX Route 965.

Based on the analysis, proposed changes to MAX Route 965 are not projected to generate a disparate impact to minority populations. Based on the analysis of the Census data, minorities who are affected by the change is not greater than 5%. Based on O&D data analysis, those minorities who are affected by the change is greater than 5%. However, that percentage is -25.7 % lower than the system’s service characteristics. These impacts do not appear to disproportionately negatively impact minorities.

Based on the analysis, proposed changes to the MAX Route 965 may create a disproportionate burden to low-income populations. Based on the analysis of the Census data, the impact to low-income persons is higher than the 5% threshold, with the persons impacted being approximately 42.2% than the system average. Based on O&D data analysis, those low-income persons who are affected by the change is also greater than 5%. That percentage is -23.8% higher than the system’s service characteristics for MAX riders, in comparison to system ride. The Origin and Destination study show the MAX ridership being 100% low-

income person. Therefore, there may be a disproportionate burden that negatively impact low-income persons.

### **PUBLIC INVOLVEMENT**

Hampton Roads Transit Planning and Marketing and Communications departments initiated public outreach activities to engage this part of the service area to communicate with customers and stakeholders regarding the proposed changes and solicit comment and feedback to identify if there are potential impacts not captured by the analysis.

The Route 965 is an express service; therefore, the public outreach strategy will consist of traditional and non-traditional methods of outreach and communication. As required by HRT's Public Participation Plan (2017), a plan has been crafted that identifies the public and community's engagement as it relates to the elimination of the Route 965. This includes, but is not limited to promotion via social media, website, ACS announcements on transit vehicles, communication at public meetings where individuals/groups may be impacted by this change, and notification at our Transit Riders Advisory Council (TRAC) meeting, which is also open to the public. Meetings with key stakeholders; including riders whose destination is the Naval Base were also engaged in meeting at the Navy Base.

A Public Meeting was held on Wednesday, January 17, 2018 at HRT's Headquarters (Hampton) to solicit feedback and comment. Information regarding the proposed changes was also posted in transit and transfer centers; including methods to contact HRT for more information and/or to provide comment.

### **MITIGATION**

Though through the analysis, no disparate have been identified for minority persons. HRT performed a Title VI Analysis on Fare Changes that evaluated the implementation of associated fares, including MAX service (see document – Title VI Fare Analysis – Final). MAX service is an express service with a premium fare. Passengers will still have access to their origin and destination via fixed route service at a total trip cost of \$4.50, which is a lower cost than the premium fare of MAX service at \$7.50.

Through outreach efforts and interviewing passengers those riders identified utilizing the service received a funds from the federal government which subsidizes their costs for the MAX fare. HRT provides outreach and awareness of this program through its Travel Demand Management Program – TRAFFIX, and efforts were made to continue to promote the TIP program, for both minority and low-income persons who may be impacted by the route elimination. The Transportation Incentive Program (TIP) is intended to reduce Federal employees' contribution to traffic congestion and air pollution, and to expand their commuting alternatives. The Department of Transportation (DOT), on behalf of Department of Defense (DOD), purchases and distributes transit vouchers and/or fare media for Department of the Navy (DON) participants. All Navy and Marine Corps military members and federal DON civilian employees, including Non-appropriated Fund (NAF) employees; part-time federal employees and interns; and reservists on active duty for more than 30 days are entitled to the same benefits and are to apply for this benefit in the same manner as is applicable to members/employees in the same geographic area are eligible to receive this fringe benefit. Acceptable methods of mass transportation include commuter bus/train, ferry (foot passenger only), vanpool and subway/lightrail. Eligible commuters may receive up to \$260 a month for commuter expenses.

Hampton Roads Transit also postponed the route elimination from February to June 2018 as another mitigative strategy/effort.

### **Transit Options**

In order access Naval Station Norfolk by bus current 965 riders would need to take the following buses. The first trip on Route 112 departs Patrick Henry Mall at 6:15 am.

- Route 112 – From Patrick Henry to Newport News Transit Center
- Route 961 – From Newport News Transit Center to Wards Corner
- Route 21 – From Wards Corner to Naval Station Norfolk (no service would be provided to the Air Station side of the base (Bellinger & 5<sup>th</sup>) by Route 21

**Note:** At the time of this analysis, Hampton Roads Transit is operating under its 2014 Title VI Program. HRT's 2016 Title VI Program is in review status by the Federal Transit Administration.

# **TITLE VI ANALYSIS**

## **PROPOSED SERVICE CHANGES EFFECTIVE: OCTOBER 21, 2018**

**TITLE VI, ENVIRONMENTAL JUSTICE, AND LIMITED ENGLISH PROFICIENCY**  
**ANALYSIS OF PROPOSED SERVICE CHANGES:**  
**OCTOBER 21, 2018**

**TITLE VI PROGRAM OVERVIEW**

TITLE VI

Title VI of the Civil Rights Act of 1964 provides that no person shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

EXECUTIVE ORDER 12898

Executive Order (EO) 12898 “Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations” directs Federal agencies to achieve “environmental justice...by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.”

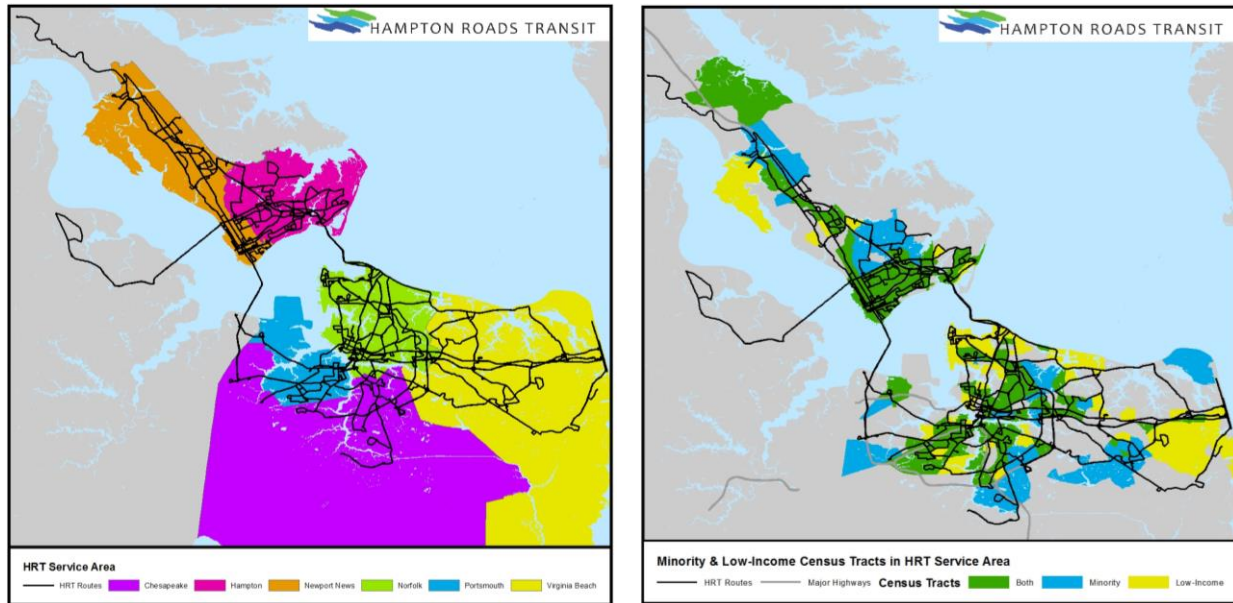
HRT TITLE VI PROGRAM

The Federal Transit Administration (FTA) provides guidance to recipients of federal funding to incorporate both Title VI and Environmental Justice (EJ) into their public transportation decision- making. FTA requires recipients to evaluate service, fare changes, and proposed improvements at the planning and programming stages, in order to determine whether those changes have a discriminatory effect through disparate impact or disproportionate burdens to minority and/or low-income populations, respectively. For service changes, this requirement applies to “major service changes” only. Per Hampton Roads Transit (HRT) Title VI Policy:

- Major Service Change - a change of 25% or more of transit vehicle miles or service hours for a route within the HRT service area.
- HRT service area - the cities of Chesapeake, Hampton, Newport News, Norfolk, Portsmouth, and Virginia Beach. A map of the service area is provided in Figure 1.
- Minority Population - The total minority population as defined in the US 2010 Census – ACS 2014 is 47.1% of the total population by census tract and land area within the HRT service area. The total minority ridership for the HRT system based on the 2016 Origin and Destination Survey is 72.6% of the total HRT System Ridership.
- “Low-Income Population” - persons living at or below 150% of the poverty line in HRT’s service area. The total low-income population as identified by the 2015 American Community Survey is approximately 20.5% of the total population by census tract and land area within the HRT service area. The total low-income ridership for the HRT system based on the 2016 Origin and Destination Survey Ridership Survey is 69.3% of the total HRT System Ridership.
- Determination of whether a proposed Major Service Change has either disparate or disproportionate impact is based on whether the percentage of minority and/or low-income passengers on an affected transit route (bus or fixed guideway) is greater than five (5) percentage points of the transit system’s percentage of minority and/or low-income riders. Ridership data is the preferred data source; census counts by tract data is used when ridership data is not available or applicable.

The following layered maps identify the HRT routes, HRT service area and Census tracts with total minority and low-income populations greater than the service area average. This information provides a baseline for the analysis of all proposed major service changes.

**CENSUS TRACTS – MINORITY & LOW-INCOME POPULATIONS**



**PROPOSED MAJOR SERVICE CHANGE POLICY**

The proposed routes, whose service by enhancement, reduction or elimination were identified as major service changes:

- Route **116**
- Route **119**
- MAX Route **972**
- MAX Route **973**
- MAX Route **974**

Changes to the Routes 116 and 119 and the creation of the Metro Area Express (The MAX) Routes listed above were being considered for October 21, 2018. Changes to the aforementioned routes exceed the 25% Major Service Change Threshold as identified in Hampton Roads Transit Title VI Program. The Title VI Equity Analysis for the Routes 116, 119 and MAX Routes 972, 973, and 974 reviews the proposed service changes for; potential disparate impacts minority populations. The review of these route changes also analyzes if there is a disproportionate burden on minority and/or low-income populations. If a disparate impact or disproportionate burden is identified, Hampton Roads Transit is required to provide justification for and reasonable alternatives to the proposed action, and to identify mitigation to avoid or minimize any disparate or disproportionate impact.

It is HRT’s policy to use Census data and Origin and Destination survey data to analyze Title VI impacts of major service changes whenever that data is available. Data from the U.S. Census – 2014 American Community Survey (ACS) and the HRT system-wide survey data from its 2016 Origin & Destination Study was used for this equity analysis.

# **ROUTE 116:**

## **JEFFERSON/LEE HALL**



**ROUTE 116: JEFFERSON/LEE HALL**
**ROUTE OVERVIEW**

Route 116 (Jefferson/Lee Hall) provides service daily between Patrick Henry Mall and Lee Hall. The route operates hourly Monday through Saturday from 6:33 am to 11:09 pm.

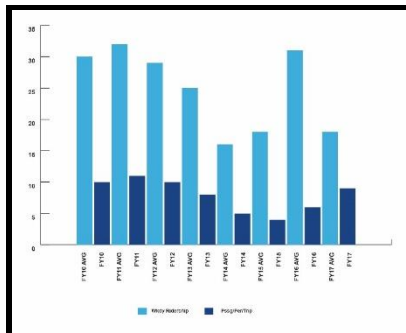
The reduction/elimination of service is above the Major Service Change Threshold of 25%; therefore, a Title VI Analysis is required.

**SERVICE RECOMMENDATION AND JUSTIFICATION**

The recommendation is to discontinue service due to low route productivity/ridership, and the service not meeting the required performance standards for MAX service as identified in Hampton Roads Transit's Service Standards and Performance Policy (PD-112). For MAX service the minimum passenger per boarding for a one-way trip is 20 passengers. The recommended change would be effective October 21, 2018.

**TABLE 1A: ROUTE 116 RIDERSHIP**

<b>WEEKDAY (FY17) PASSENGERS PER HOUR</b>	<b>SATURDAY (FY17) PASSENGERS PER HOUR</b>	<b>SUNDAY (FY17) PASSENGERS PER HOUR</b>
7	6	5

**FIGURE 1A: MAX ROUTE 116 PERFORMANCE DATA**


**FIGURE 1B: ROUTE 116 MINORITY & LOW-INCOME CENSUS TRACTS MAP**

**DETERMINATION OF IMPACTS –ROUTE 116**

The following tables show the proportion of minority and low-income persons impacted by the proposed elimination of the Route 116. HRT’s Title VI Program states that if the percentage of minorities potentially affected by an action is greater than 5% of the service area average, then the service change may have a disparate impact. If the percentage of low-income persons potentially affected by an action is greater than 5% of the system area average, then the service change may have a disproportionate burden. HRT service area characteristics and the characteristics of the Route 116 were evaluated using 2014 ACS Census data and 2016 Origin and Destination Survey Data. Both Census and Origin and Destination data were utilized for this Title VI analysis. The evaluation of both data sources was warranted; this was due to the population that utilize the service and data captured by the Origin & Destination survey for fixed route service.

**TABLE 1B: MINORITY AND LOW-INCOME POPULATIONS WITHIN SERVICE AREA**

	<b>HRT SERVICE AREA CENSUS</b>	<b>MAX RTE. 116 SERVICE AREA CENSUS</b>		<b>HRT RIDERS O&amp;D SURVEY</b>	<b>RTE. 116 RIDERS O&amp;D SURVEY</b>
<b>MINORITY</b>	47.1%	53.1%		73.4%	70.4%
<b>LOW-INCOME</b>	20.5%	24.0%		69.4%	79.0%

**TABLE 1C: ANALYSIS FINDINGS SUMMARY**

<b>DATA SOURCE/ TITLE VI POPULATION</b>	<b>ANALYSIS FINDINGS</b>
CENSUS ANALYSIS MINORITY POPULATIONS	The impact to the population within the service area is greater than the 5% threshold for minority populations utilizing Census data, by <b>6.0%</b> .
O&D ANALYSIS MINORITY POPULATIONS	The impact to the population utilizing the service is greater than the 5% threshold for minority populations utilizing O&D survey data by <b>-3.0%</b> utilizing O&D data for MAX Route 116.
CENSUS ANALYSIS LOW-INCOME POPULATIONS	The impact to the population within the service area is less than the 5% threshold for low-income populations utilizing Census data, by <b>3.5%</b> .
O&D ANALYSIS LOW-INCOME POPULATIONS	The impact to the population utilizing the service is greater than the 5% threshold for low-income populations utilizing O&D survey data, by <b>9.6%</b> utilizing O&D data for MAX Route 116.

Based on the analysis, proposed changes to MAX Route 116 is projected to generate a disparate impact to minority populations. Based on the analysis of the Census data, minorities who are affected by the change is greater than 5%. The percentage is 6.0% higher than the system’s service characteristics. Based on O&D data analysis, those minorities who are affected by the change is less than 5%. That percentage is -3.0% lower than the system’s service characteristics. These impacts, according to the Census data may disproportionately negatively impact minorities.

Based on the analysis, proposed changes to the MAX Route 116 are projected to create a disproportionate burden to low-income populations. Based on the analysis of the Census data, the impact to low-income persons is within the 5% threshold. Based on O&D data analysis, those low-income persons who are affected by the change is greater than 5%. However, that percentage is -9.6% lower than the system’s service characteristics. These impacts do not appear disproportionately negatively impact low-income persons.

### **PUBLIC INVOLVEMENT**

Hampton Roads Transit’s Planning and Marketing and Communications departments initiated public outreach activities to engage this part of the service area. HRT communicated with customers and stakeholders regarding the proposed changes and solicited comments and feedback to identify if there were potential impacts to Title VI populations not captured by the analysis.

The Route 116 is a fixed route service; therefore, the public outreach strategy consisted of traditional and non-traditional methods of outreach and communication. As required by HRT’s Public Participation Plan (2017), a plan was crafted that identifies the public and community’s engagement as it relates to the elimination of the Route 116. This includes, but is not limited to, promotion via social media, HRT’s website, distribution of materials at bus stops, communication at public meetings where individuals/groups may be impacted by this change, and notification at HRT’s Transit Riders Advisory Council (TRAC) meeting, which is also open to the public.

A Public Meeting was held on Wednesday, September 5, 2018 at HRT’s Headquarters (3400 Victoria Blvd) to solicit feedback and comment. Information regarding the proposed changes was also posted in transit and transfer centers; including methods to contact HRT for more information and/or to provide comment.

**MITIGATION**

The following mitigation strategies and increase in service/benefits are proposed for the elimination of MAX Route 116.

HRT has provided options to lessen the impacts of this discontinuation of service to customers. The service on the route 116 that provided service to a major employer/travel destination, Walmart will be provided by the Route 108. Therefore, riders will not lose the access to that location whereby service was discontinued by the Route 116. There was no reasonable alternative that could be provided for service lost to the Airport. This information regarding options available to utilize HRT's fixed-route bus system was made available to the public. This includes options to/from their destination by way of fixed-route transit. Information on how to access their origin/destination via transit and information on how to utilize the service was made available to the public for those who utilized the service and required options for transit service.

HRT did also provide a benefit of service through an extension of the Route 116 to Woodside Lane, Fishing Point, and Riverside Regional Medical Center and Christopher Newport University.

A disproportionate burden was identified for low-income communities for Route 116. Mitigation was shown to be required for minority or low-income persons. Hampton Roads Transit performed a Title VI Analysis in 2014 regarding its change in fares to the rates that are in effect at the time of this analysis. Those rates went into effect in October 2017.

# **ROUTE 119**

## **OYSTER POINT**

## Route 119: Oyster Point

### ROUTE OVERVIEW

MAX Route 119 (Oyster Point) provides service Monday through Friday between Fishing Point Drive and Riverside Regional Medical Center with a stop at Christopher Newport University. Monday through Friday service operates hourly from 5:52 AM to 11:51 PM.

The reduction/elimination of service is above the Major Service Change Threshold of 25%; therefore, a Title VI Analysis is required.

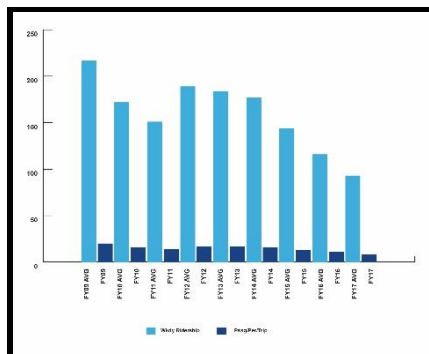
### SERVICE RECOMMENDATION AND JUSTIFICATION

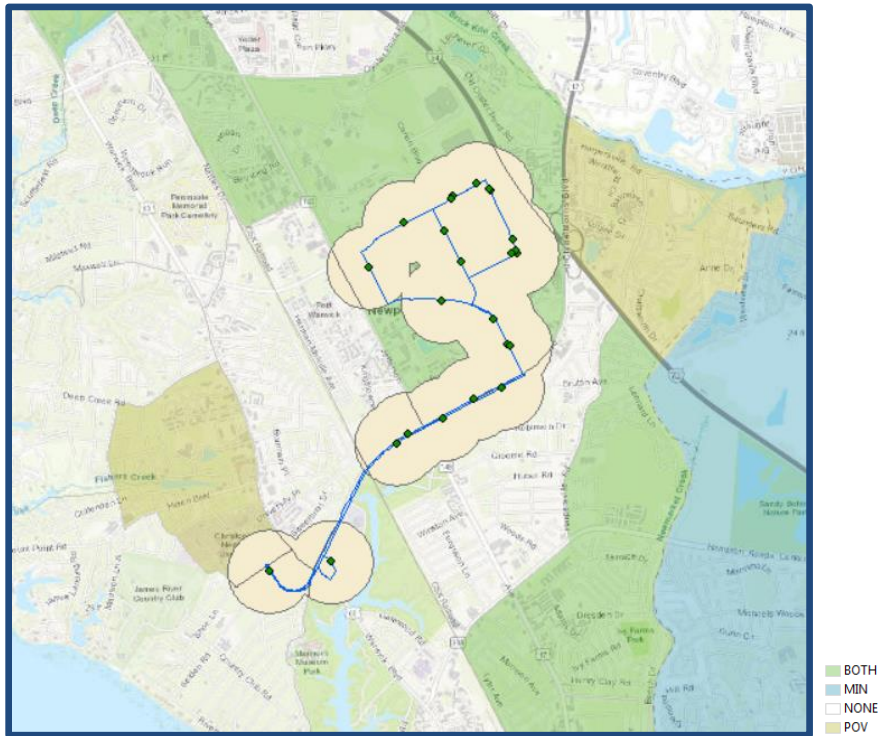
The recommendation was to discontinue a portion of the trips on the service due to low route productivity/ridership on those individual trips, and those trips not meeting the required performance standards for MAX service as identified in Hampton Roads Transit's Service Standards and Performance Policy (PD-112). For MAX service the minimum passenger per boarding for a one-way trip is 20 passengers. The recommended change would be effective October 21, 2018.

**TABLE 2A: ROUTE 119 RIDERSHIP**

<b>WEEKDAY (FY17) PASSENGERS PER HOUR</b>	<b>SATURDAY (FY17) PASSENGERS PER HOUR</b>	<b>SUNDAY (FY17) PASSENGERS PER HOUR</b>
8	3	3

**FIGURE 2A: MAX ROUTE 119 PERFORMANCE DATA**



**FIGURE 2B: MAX ROUTE 119 MINORITY & LOW-INCOME CENSUS TRACTS MAP**

**DETERMINATION OF IMPACTS – MAX ROUTE 119**

The following tables show the proportion of minority and low-income persons impacted by the proposed reduction of service of the MAX Route 119. HRT’s Title VI Program states that if the percentage of minorities potentially affected by an action is greater than 5% of the service area average, then the service change may have a disparate impact. If the percentage of low-income persons potentially affected by an action is greater than 5% of the system area average, then the service change may have a disproportionate impact. If the percentage of low-income people potentially affected by an action is greater than 5% of the system area average, then the service change may have a disproportionate burden. HRT service area characteristics and the characteristics of the Route 119 were evaluated using 2014 ACS Census data and 2016 Origin and Destination Survey Data. Both Census and Origin and Destination data were utilized for this Title VI analysis. MAX services are commuter services and evaluating both data sources was warranted; this was due to the population that utilize the service and data captured by the Origin & Destination survey specific to MAX service.

**TABLE 2: MINORITY AND LOW-INCOME POPULATIONS WITHIN SERVICE AREA**

	<b>HRT SERVICE AREA CENSUS</b>	<b>MAX RTE. 119 SERVICE AREA CENSUS</b>		<b>HRT RIDERS O&amp;D SURVEY</b>	<b>MAX RTE. 119 RIDERS O&amp;D SURVEY</b>
<b>MINORITY</b>	47.1%	48.2%		73.4%	66.4%
<b>LOW-INCOME</b>	20.5%	23.9%		69.4%	64.1%

TABLE 2C: ANALYSIS FINDINGS SUMMARY

<b>DATA SOURCE/ TITLE VI POPULATION</b>	<b>ANALYSIS FINDINGS</b>
CENSUS ANALYSIS MINORITY POPULATIONS	The impact to the population within the service area is not greater than the 5% threshold for minority populations utilizing Census data, at <b>1.1%</b> .
O&D ANALYSIS MINORITY POPULATIONS	The impact to the population utilizing the service is greater than the 5% threshold for minority populations utilizing O&D survey data <b>3.4%</b> utilizing O&D data for MAX Route 119.
CENSUS ANALYSIS LOW-INCOME POPULATIONS	The impact to the population within the service area is less than the 5% threshold for low-income populations utilizing Census data, at <b>3.4%</b> .
O&D ANALYSIS LOW-INCOME POPULATIONS	The impact to the population utilizing the service is greater than the 5% threshold for low-income populations utilizing O&D survey data by - <b>5.3%</b> utilizing O&D data for MAX Route 119.

Based on the analysis, proposed changes to MAX Route 119 are not projected to generate a disparate impact to minority populations. Based on the analysis of the Census data, minorities who are affected by the change is not greater than the 5% threshold. Based on O&D data analysis, those minorities who are affected by the change is not than the 5%. That percentage is 3.4% lower than the system’s service characteristics. These impacts do not appear to disproportionately negatively impact minorities.

Based on the analysis, proposed changes to the MAX Route 119 are projected to create a disproportionate burden to low-income populations. Based on the analysis of the Census data, the impact to low-income persons is within the 5% threshold. Based on O&D data analysis, those low-income persons who are affected by the change is greater than 5%. That percentage is 5.3% greater than the system’s service characteristics. These impacts appear disproportionately negatively impact low-income persons.

### **PUBLIC INVOLVEMENT**

Hampton Roads Transit’s Planning and Marketing and Communications departments initiated public outreach activities to engage this part of the service area. HRT communicated with customers and stakeholders regarding the proposed changes and solicited comments and feedback to identify if there were potential impacts to Title VI populations not captured by the analysis.

The Route 119 is a fixed route service; therefore, the public outreach strategy consisted of traditional and non-traditional methods of outreach and communication. As required by HRT’s Public Participation Plan (2017), a plan was crafted that identifies the public and community’s engagement as it relates to the elimination of the Route 119. This includes, but is not limited to, promotion via social media, HRT’s website, distribution of materials at bus stops, communication at public meetings where individuals/groups may be impacted by this change, and notification at HRT’s Transit Riders Advisory Council (TRAC) meeting, which is also open to the public.

A Public Meeting was held on Wednesday, September 5, 2018 at HRT’s Headquarters (3400 Victoria Blvd) to solicit feedback and comment. Information regarding the proposed changes was also posted in transit and transfer centers; including methods to contact HRT for more information and/or to provide comment.

### **MITIGATION**



Mitigation strategies are proposed for changes to MAX Route 119. Through the analysis, no disparate impacts have been identified to Title VI or environmental justice populations utilizing Census data. However, a review of the O&D data for the Route 119, a disproportionate burden was identified for low-income persons.

A disproportionate burden was identified for low-income communities for Route 119. Mitigation was shown to be necessary for low-income persons utilizing O&D data. Hampton Roads Transit performed a Title VI Analysis in 2014 regarding its change in fares to the rates that are in effect at the time of this analysis. Those rates went into effect in October 2017. Through the extension of service of the Route 116 to Woodside Lane, Fishing Point, and Riverside Regional Medical Center and Christopher Newport University no additional fare burden appears to be placed upon the ridership. This information regarding options available to utilize HRT's fixed-route bus system was made available to the public. This includes options to/from their destination by way of fixed-route transit. Information on how to access their origin/destination via transit and information on how to utilize the service was made available to the public for those who utilized the service and required options for transit service.

# **MAX ROUTE 972**

**TIDEWATER COMMUNITY COLLEGE (VA BEACH),  
INDIAN RIVER PARK & RIDE, NEWPORT NEWS  
SHIPBUILDING, NEWPORT NEWS TRANSIT CENTER**

**MAX Route 972: (TIDEWATER COMMUNITY COLLEGE (VA BEACH), INDIAN RIVER PARK & RIDE, NEWPORT NEWS SHIPBUILDING, NEWPORT NEWS TRANSIT CENTER)**

**ROUTE OVERVIEW**

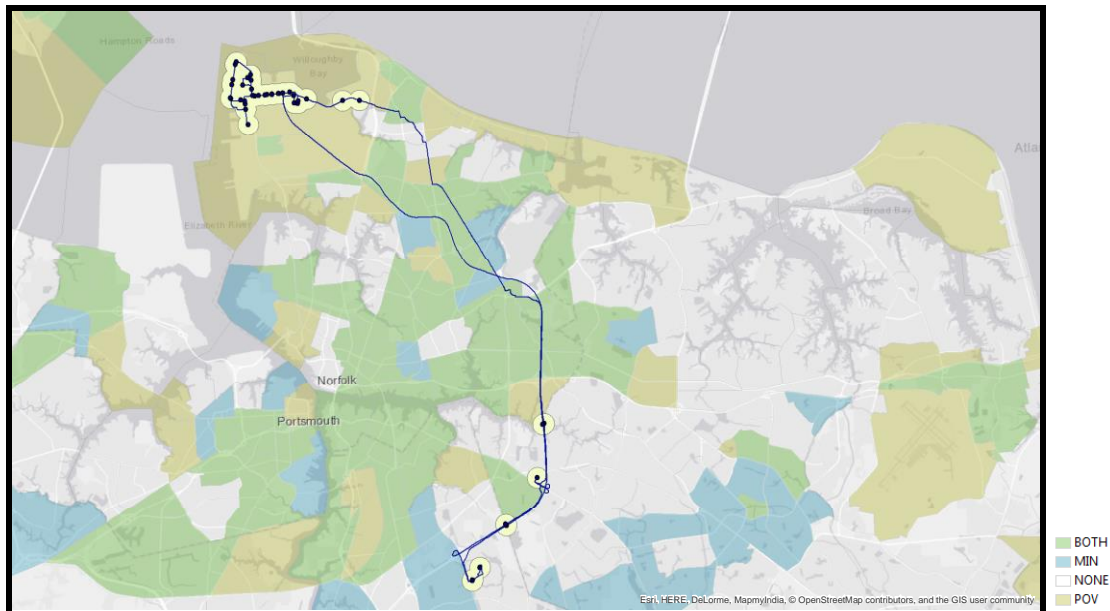
MAX Route 972 will provide express service from Tidewater Community College in Virginia Beach to Indian River Park and Ride to Newport News Shipbuilding (North Yard) and terminate at Newport News Transit Center. One morning and one afternoon trip will be provided Monday through Friday.

The addition of new service is above the Major Service Change Threshold of 25%; therefore, a Title VI Analysis is required.

**SERVICE RECOMMENDATION AND JUSTIFICATION**

The express service is funded through a Smart Scale grant and meets transit service needs identified in the region.

**FIGURE 1B: MAX ROUTE 972 MINORITY & LOW-INCOME CENSUS TRACTS MAP**



**DETERMINATION OF IMPACTS – MAX ROUTE 972**

The following tables show the proportion of the minority and low-income persons impacted by the proposed elimination of the MAX Route 972. HRT’s Title VI Program states that if the percentage of minorities potentially affected by an action is greater than 5% of the service area average, then the service change may have a disparate impact. If the percentage of low-income people potentially affected by an action is greater than 5% of the system area average, then the service change may have a disproportionate burden. HRT service area characteristics and the characteristics of the Route 972 were evaluated using 2014 ACS Census data and 2016 Origin and Destination Survey Data. Both Census and Origin and Destination data were utilized for this Title VI analysis. MAX services are commuter services and evaluating both data sources was warranted; this was due to the population that utilize the service and data captured by the Origin & Destination survey specific to MAX service.

**TABLE 3B: MINORITY AND LOW-INCOME POPULATIONS WITHIN SERVICE AREA**

	<b>HRT SERVICE AREA CENSUS</b>	<b>MAX RTE. 972 SERVICE AREA CENSUS</b>		<b>HRT RIDERS O&amp;D SURVEY</b>
<b>MINORITY</b>	47.1%	56.2%		73.4%
<b>LOW-INCOME</b>	20.5%	23.5%		69.4%

**TABLE 2C: ANALYSIS FINDINGS SUMMARY**

<b>DATA SOURCE/ TITLE VI POPULATION</b>	<b>ANALYSIS FINDINGS: MAX 972</b>
CENSUS ANALYSIS MINORITY POPULATIONS	The impact to the population within the service area is higher than the 5% threshold for minority populations utilizing Census data, at 9.1%.
CENSUS ANALYSIS LOW-INCOME POPULATIONS	The impact to the population within the service area is less than the 5% threshold for low-income populations utilizing Census data, by -3.0%.

Based on the analysis, proposed changes to MAX Route 972 are not projected to generate a negative disparate impact to minority populations as new service is being offered and the addition of service would provide a benefit to minorities. Based on the analysis of the Census data, minorities who are affected by the change is greater than 5% threshold. No O&D data analysis is made as the service was not in operation at the time data was collected for the O&D survey. These impacts do not appear to disproportionately negatively impact minorities.

Based on the analysis, proposed changes to the MAX Route 972 are not projected to create a disproportionate burden to low-income populations. Based on the analysis of the Census data, the impact to low-income persons is within the 5% threshold. Based on O&D data analysis, those low-income persons who are affected by the change is greater than 5%. These impacts do not appear disproportionately negatively impact low-income persons.

### **PUBLIC INVOLVEMENT**

Hampton Roads Transit’s Planning and Marketing and Communications departments initiated public outreach activities to engage this part of the service area. HRT communicated with customers and stakeholders regarding the proposed changes and solicited comments and feedback to identify if there are potential impacts to Title VI populations not captured by the analysis.

The Route 972 is an express service; therefore, the public outreach strategy consisted of traditional and non-traditional methods of outreach and communication. As required by HRT’s Public Participation Plan (2017), a plan has been crafted that identifies the public and community’s engagement as it relates to service for the Route 972. This includes, but is not limited to, promotion via social media, HRT’s website, ACS announcements on transit vehicles, communication at public meetings where individuals/groups may be impacted by this change, and notification at HRT’s Transit Riders Advisory Council (TRAC) meeting, which is also open to the public. Meetings with key stakeholders; including riders whose destination is the Naval Base were also engaged in a meeting at the Navy Base.

Public Meetings were held on Wednesday, September 5, 2018 at HRT’s Headquarters and Thursday, September 6, 2018 at HRT’s Southside Facility to solicit feedback and comment. Information regarding the proposed changes was also posted in transit and transfer centers and through outreach to the Military; including methods to contact HRT for more information and/or to provide comment.

### MITIGATION

No mitigation strategies are proposed for the addition of new service of the MAX Route 972. Through the analysis, no negative disparate and/or disproportionate impacts have been identified to Title VI or environmental justice populations.

No disproportionate burden was identified for low-income communities for MAX Route 972. No mitigation was shown to be required for minority or low-income persons that utilized the MAX fare type. Hampton Roads Transit performed a Title VI Analysis in 2014 regarding its change in fares to the rates that are in effect at the time of this analysis. Those rates went into effect in October 2017.

Information on the service times for morning and afternoon trips for MAX 972 riders was made available to the public.

**MAX ROUTE 973**  
**TIDEWATER COMMUNITY COLLEGE**  
**(PORTSMOUTH) –**  
**NAVAL STATION NORFOLK**

**ROUTE OVERVIEW**

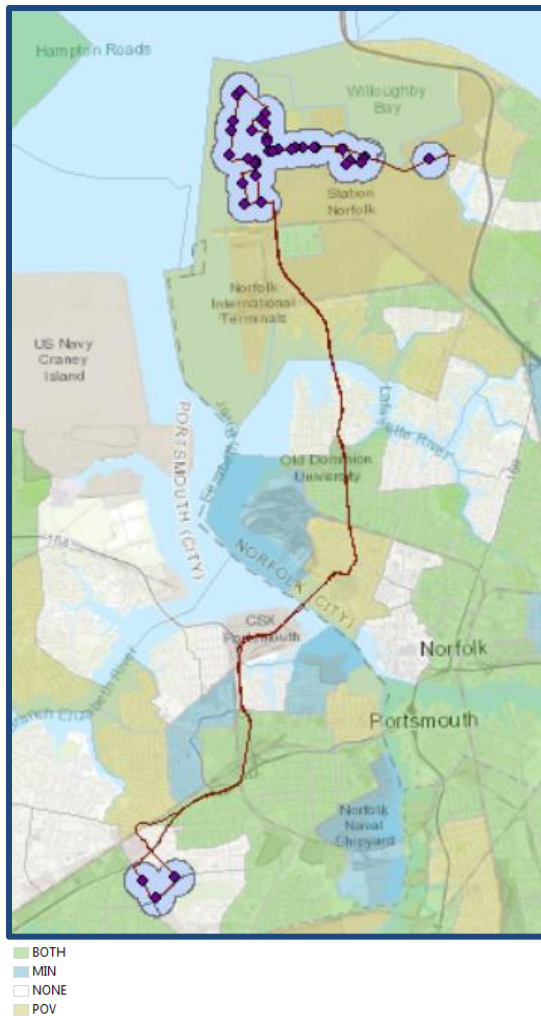
MAX Route 973 (Tidewater Community College (Portsmouth)) provides express service from Chesapeake Center in Chesapeake to Naval Station Norfolk. Two morning and two afternoon trips will be provided Monday through Friday.

The addition of new of service is above the Major Service Change Threshold of 25%; therefore, a Title VI Analysis is required.

**SERVICE RECOMMENDATION AND JUSTIFICATION**

The recommendation is to allow for the addition of the new service. The MAX service is funded by a Smart Scale Grant. The performance standards for MAX service as identified in Hampton Roads Transit’s Service Standards and Performance Policy (PD-112). For MAX service the minimum passenger per boarding for a one-way trip is 20 passengers. The recommended change would be effective October 22, 2018.

**FIGURE 1B: MAX ROUTE 973 MINORITY & LOW-INCOME CENSUS TRACTS MAP**



**DETERMINATION OF IMPACTS – MAX ROUTE 973**

The following tables show the proportion of minority and low-income persons impacted by the proposed addition of service for the MAX Route 973. HRT’s Title VI Program states that if the percentage of

minorities potentially affected by an action is greater than 5% of the service area average, then the service change may have a disparate impact. If the percentage of low-income persons potentially affected by an action is greater than 5% of the system area average, then the service change may have a disproportionate burden. HRT service area characteristics and the characteristics of the MAX Route 973 were evaluated using 2014 ACS Census data. Census data was utilized as Origin and Destination data was not available for this Title VI analysis.

**TABLE 1B: MINORITY AND LOW-INCOME POPULATIONS WITHIN SERVICE AREA**

	<b>HRT SERVICE AREA CENSUS</b>	<b>MAX RTE. 973 SERVICE AREA CENSUS</b>		<b>HRT RIDERS O&amp;D SURVEY</b>
<b>MINORITY</b>	47.1%	47.0%		73.4%
<b>LOW-INCOME</b>	20.5%	26.7%		69.4%

**TABLE 1C: ANALYSIS FINDINGS SUMMARY**

<b>DATA SOURCE/ TITLE VI POPULATION</b>	<b>ANALYSIS FINDINGS</b>
CENSUS ANALYSIS MINORITY POPULATIONS	The impact to the population within the service area is greater than the 5% threshold for minority populations utilizing Census data, by <b>-0.1%</b> .
CENSUS ANALYSIS LOW-INCOME POPULATIONS	The impact to the population within the service area is less than the 5% threshold for low-income populations utilizing Census data, by <b>6.2%</b> .

Based on the analysis, proposed addition of new service for MAX Route 973 are not projected to generate a disparate impact to minority populations. Based on the analysis of the Census data, minorities who are affected by the change is less than 5%. That percentage is -0.1% lower than the system’s service characteristics. These impacts do not appear to disproportionately negatively impact minorities.

Based on the analysis, proposed addition of new service for the MAX Route 973 are not projected to create a negative disproportionate burden to low-income populations. Based on the analysis of the Census data, the impact to low-income persons is greater than the 5% threshold. That percentage is 6.2% higher than the system’s service characteristics. These impacts do not appear disproportionately negatively impact low-income persons as new service is being offered and the addition of service would provide a benefit to low-income persons.

**PUBLIC INVOLVEMENT**

Hampton Roads Transit’s Planning and Marketing and Communications departments initiated public outreach activities to engage this part of the service area. HRT communicated with customers and stakeholders regarding the proposed changes and solicited comments and feedback to identify if there are potential impacts to Title VI populations not captured by the analysis.

The Route 973 is an express service; therefore, the public outreach strategy consisted of traditional and non-traditional methods of outreach and communication. As required by HRT’s Public Participation Plan (2017), a plan has been crafted that identifies the public and community’s engagement as it relates to service for the Route 973. This includes, but is not limited to, promotion via social media, HRT’s website, ACS announcements on transit vehicles, communication at public meetings where individuals/groups may be impacted by this change, and notification at HRT’s Transit Riders Advisory Council (TRAC) meeting, which is also open to the public. Meetings with key stakeholders; including riders whose destination is the Naval Base were also engaged in a meeting at the Navy Base.



Public Meetings were held on Wednesday, September 5, 2018 at HRT's Headquarters and Thursday, September 6, 2018 at HRT's Southside Facility to solicit feedback and comment. Information regarding the proposed changes was also posted in transit and transfer centers and through outreach to the Military; including methods to contact HRT for more information and/or to provide comment.

### MITIGATION

No mitigation strategies are proposed for the addition of new service of the MAX Route 973. Through the analysis, no negative disparate and/or disproportionate impacts have been identified to Title VI or environmental justice populations.

No disproportionate burden was identified for low-income communities for MAX Route 973. No mitigation was shown to be required for minority or low-income persons that utilized the MAX fare type. Hampton Roads Transit performed a Title VI Analysis in 2014 regarding its change in fares to the rates that are in effect at the time of this analysis. Those rates went into effect in October 2017.

Information on the service times for morning and afternoon trips for MAX 973 riders was made available to the public.

# **MAX ROUTE 974**

## **CHESAPEAKE CENTER – NAVAL STATION NORFOLK**

**ROUTE OVERVIEW**

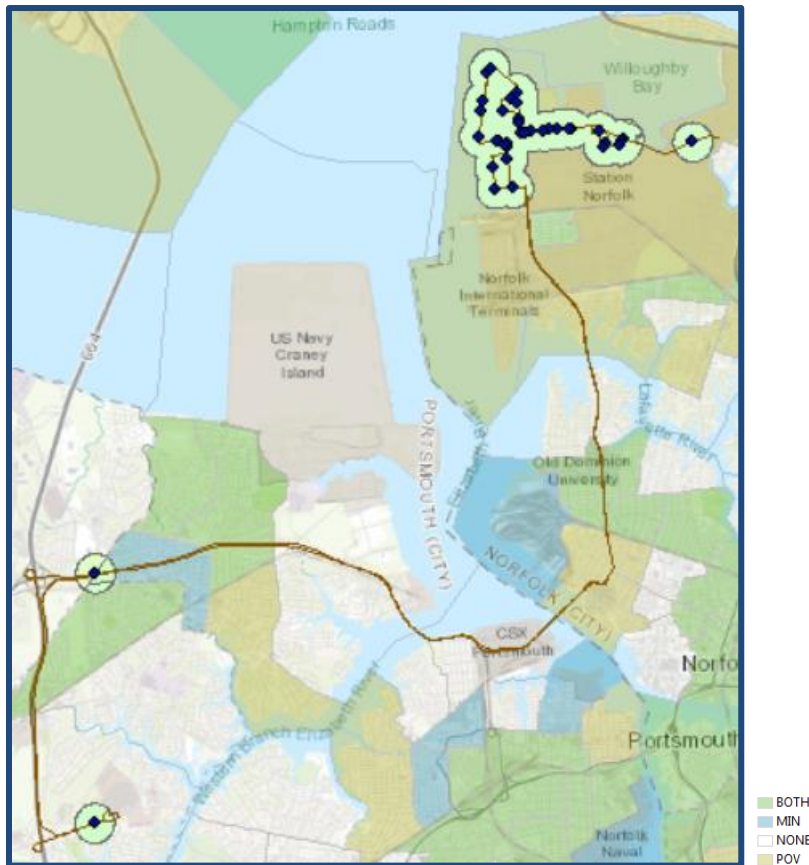
Route 974 (Chesapeake Center – Naval Station Norfolk) will provide express service from Chesapeake Center in Chesapeake to Naval Station Norfolk. Two morning and two afternoon trips will be provided Monday through Friday.

The addition of new service is above the Major Service Change Threshold of 25%; therefore, a Title VI Analysis is required.

**SERVICE RECOMMENDATION AND JUSTIFICATION**

The recommendation is to allow for the addition of the new service. The MAX service is funded by a Smart Scale Grant. The performance standards for MAX service as identified in Hampton Roads Transit’s Service Standards and Performance Policy (PD-112). For MAX service the minimum passenger per boarding for a one-way trip is 20 passengers. The recommended change would be effective October 22, 2018.

**FIGURE 1B: ROUTE 116 MINORITY & LOW-INCOME CENSUS TRACTS MAP**



**DETERMINATION OF IMPACTS – MAX ROUTE 974**

The following tables show the proportion of minority and low-income persons impacted by the proposed addition of service for the MAX Route 974. HRT’s Title VI Program states that if the percentage of minorities potentially affected by an action is greater than 5% of the service area average, then the service change may have a disparate impact. If the percentage of low-income persons potentially affected by an action is greater than 5% of the system area average, then the service change may have a disproportionate burden. HRT service area characteristics and the characteristics of the MAX Route 974 were evaluated

using 2014 ACS Census data. Census data was utilized as Origin and Destination data was not available for this Title VI analysis.

**TABLE IB: MINORITY AND LOW-INCOME POPULATIONS WITHIN SERVICE AREA**

	<b>HRT SERVICE AREA CENSUS</b>	<b>MAX RTE. 974 SERVICE AREA CENSUS</b>	<b>HRT RIDERS O&amp;D SURVEY</b>
<b>MINORITY</b>	47.1%	44.8%	73.4%
<b>LOW-INCOME</b>	20.5%	25.0%	69.4%

**TABLE IC: ANALYSIS FINDINGS SUMMARY**

<b>DATA SOURCE/ TITLE VI POPULATION</b>	<b>ANALYSIS FINDINGS</b>
CENSUS ANALYSIS MINORITY POPULATIONS	The impact to the population within the service area is within the 5% threshold for minority populations utilizing Census data, by -2.3%.
CENSUS ANALYSIS LOW-INCOME POPULATIONS	The impact to the population within the service area is less than the 5% threshold for low-income populations utilizing Census data, by 4.5%.

Based on the analysis, proposed addition of new service for MAX Route 974 are not projected to generate a disparate impact to minority populations. Based on the analysis of the Census data, minorities who are affected by the change is less than 5%. That percentage is -0.1% lower than the system's service characteristics. These impacts do not appear to disproportionately negatively impact minorities.

Based on the analysis, proposed addition of new service for the MAX Route 974 are not projected to create a negative disproportionate burden to low-income populations. Based on the analysis of the Census data, the impact to low-income persons is within than the 5% threshold. That percentage is 4.5% higher than the system's service characteristics. These impacts do not appear disproportionately negatively impact low-income persons as new service is being offered and the addition of service would provide a benefit to low-income persons.

### **PUBLIC INVOLVEMENT**

Hampton Roads Transit's Planning and Marketing and Communications departments initiated public outreach activities to engage this part of the service area. HRT communicated with customers and stakeholders regarding the proposed changes and solicited comments and feedback to identify if there are potential impacts to Title VI populations not captured by the analysis.

The Route 974 is an express service; therefore, the public outreach strategy consisted of traditional and non-traditional methods of outreach and communication. As required by HRT's Public Participation Plan (2017), a plan has been crafted that identifies the public and community's engagement as it relates to service for the Route 974. This includes, but is not limited to, promotion via social media, HRT's website, ACS announcements on transit vehicles, communication at public meetings where individuals/groups may be impacted by this change, and notification at HRT's Transit Riders Advisory Council (TRAC) meeting, which is also open to the public. Meetings with key stakeholders; including riders whose destination is the Naval Base were also engaged in a meeting at the Navy Base.

Public Meetings were held on Wednesday, September 5, 2018 at HRT's Headquarters and Thursday, September 6, 2018 at HRT's Southside Facility to solicit feedback and comment. Information regarding the proposed changes was also posted in transit and transfer centers and through outreach to the Military; including methods to contact HRT for more information and/or to provide comment.

### MITIGATION

No mitigation strategies are proposed for the addition of new service of the MAX Route 974. Through the analysis, no negative disparate and/or disproportionate impacts have been identified to Title VI or environmental justice populations.

No disproportionate burden was identified for low-income communities for MAX Route 974. No mitigation was shown to be required for minority or low-income persons that utilized the MAX fare type. Hampton Roads Transit performed a Title VI Analysis in 2014 regarding its change in fares to the rates that are in effect at the time of this analysis. Those rates went into effect in October 2017.

Information on the service times for morning and afternoon trips for MAX 974 riders was made available to the public.

**APPENDIX B**  
**PUBLIC MEETING COMMENTS/  
MEETING NOTES**  
**PUBLIC MEETING SIGN-IN SHEETS**



**PUBLIC MEETING NOTES: SERVICE CHANGES**

**Date:** September 5, 2018  
**Location:** HRT's Headquarters – 3400 Victoria Blvd  
**Number of Attendees:** 0 signed-in  
**Service Impacted:** MAX Service 116, 119, 972, 973,974 (all routes referenced)

**SUMMARY**

- No comments received

**Date:** September 6, 2018  
**Location:** HRT's Southside Facility – 509. E 18<sup>th</sup> St.  
**Number of Attendees:** 7 signed-in  
**Service Impacted:** MAX Service 116, 119, 972, 973,974 (all routes referenced)

**Date:** September 6, 2018  
**Location:** HRT's Southside Facility – 509. E 18<sup>th</sup> St.  
**Number of Attendees:** 2 signed-in  
**Service Impacted:** MAX Service 116, 119, 972, 973,974 (all routes referenced)

**SUMMARY**

- Attendees stated that the addition of new service to Portsmouth via the Route 973 was positive. However, had general comments regarding service to Portsmouth and Portsmouth businesses was needed separate from the service changes. Service was requested to be run later and with more frequency.



# **APPENDIX C**

## **PUBLIC OUTREACH REPORT**

### **COMMUNICATIONS/COLLATERAL MATERIALS**

**Public Outreach/Communications –Routes 116/119 and MAX Routes 972, 973, 974**

Beginning in August, the Service Planning Department distributed information to Public Outreach staff of proposed changes/increase/eliminations and addition of new service for the Routes 116, 119, 972, 973 and 974. Public meetings were scheduled in order to receive comment and feedback from riders who could be impacted by proposed changes.

The following meetings were scheduled:

Routes 116, 119, 972, 973 and 974  
Wednesday, September 5, 2018 from 6:00-7:00 pm  
Hampton Roads Transit Offices  
3400 Victoria Blvd., Hampton

Routes 116, 119, 972, 973 and 974  
Wednesday, September 5, 2018 from 6:00-7:00 pm  
Transit Riders Advisory Council Meeting  
Hampton Roads Transit Southside Facility  
509 E. 18<sup>th</sup> St., Norfolk, VA 23504

Routes 116, 119, 972, 973 and 974  
Thursday, September 6, 2018 from 6:00-7:00 pm  
Hampton Roads Transit Southside Facility  
509 E. 18<sup>th</sup> St., Norfolk, VA 23504

Customer Alerts were drafted and sent out via email on the public meetings on August 23, 2018. Notifications were also posted to the HRT Website.

Information on the proposed changes was put into a word document and shared with Customer Service staff. Posters were placed at HRT's Transit Centers and at its Headquarters and Southside Location with meeting information.

Formal letters and parallel electronic communications were sent to Communications were also sent to military and affiliate companies whose employees could be impacted by the service change changes and/or new service. This included Huntington Ingalls Industries, Naval Support Activity Hampton Roads, and Naval Station Norfolk.

Prior to the September 5 and 6th meetings, a decision was made by planning staff to meet the riders on the Routes 116 and 119 to directly solicit feedback on the service changes and provide information regarding the public meetings. Meeting information and proposed changes was distributed to approximately 20 passengers and information was distributed to bus operators. Comments from passengers consisted of how they could still receive service, and they were satisfied with their destinations being covered by the mitigation strategies.

The meeting at HRT Headquarters on September 5, had no attendees. The TRAC meeting at HRT's Headquarters in September 5, had appx. 7 attendees who signed in. The final public meeting on September 6 had two attendees. HRT Staff attending included representatives from Planning staff.

Attendees were given flyers that gave specific information on the proposed changes for each of these routes. There was good dialog from those who attended; however, many of the comments were general service

comments and not related to the service changes; Jamie Jackson, Director of Transit Development, took notes and asked all in the room for comments/questions and recorded all information that was shared. Also, blank comment forms were available for people to write comments.

# TITLE VI ANALYSIS

## PROPOSED SERVICE CHANGES

EFFECTIVE: OCTOBER 20, 2019

**TITLE VI, ENVIRONMENTAL JUSTICE, AND LIMITED ENGLISH PROFICIENCY ANALYSIS OF PROPOSED  
SERVICE CHANGES: OCTOBER 20, 2019**

**TITLE VI PROGRAM OVERVIEW**

TITLE VI

Title VI of the Civil Rights Act of 1964 provides that no person shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

EXECUTIVE ORDER 12898

Executive Order (EO) 12898 “Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations” directs Federal agencies to achieve “environmental justice...by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.”

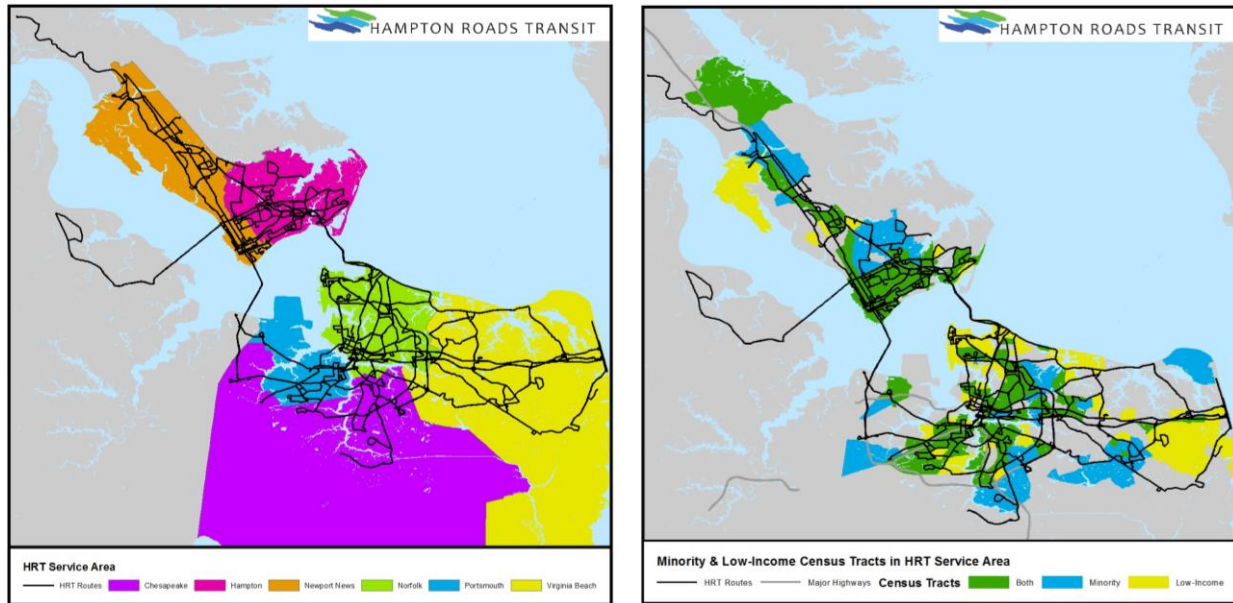
HRT TITLE VI PROGRAM

The Federal Transit Administration (FTA) provides guidance to recipients of federal funding to incorporate both Title VI and Environmental Justice (EJ) into their public transportation decision-making. FTA requires recipients to evaluate service, fare changes, and proposed improvements at the planning and programming stages, in order to determine whether those changes have a discriminatory effect through disparate impact or disproportionate burdens to minority and/or low-income populations, respectively. For service changes, this requirement applies to “major service changes” only. Per Hampton Roads Transit (HRT) Title VI Policy:

- Major Service Change - a change of 25% or more of transit vehicle miles or service hours for a route within the HRT service area.
- HRT service area - the cities of Chesapeake, Hampton, Newport News, Norfolk, Portsmouth, and Virginia Beach. A map of the service area is provided in Figure 1.
- Minority Population - The total minority population as defined in the American Community Survey (2014) is 47.1% of the total population by census block group and land area within the HRT service area. The total minority ridership for the HRT system based on the 2016 Origin and Destination Survey is 72.6% of the total HRT System Ridership.
- “Low-Income Population” - persons living at or below 150% of the poverty line in HRT’s service area. The total low-income population as identified by the 2015 American Community Survey is approximately 20.5% of the total population by census block group and land area within the HRT service area. The total low-income ridership for the HRT system based on the 2016 Origin and Destination Survey Ridership Survey is 69.3% of the total HRT System Ridership.
- Determination of whether a proposed Major Service Change has either disparate or disproportionate impact is based on whether the percentage of minority and/or low-income passengers on an affected transit route (bus or fixed guideway) is greater than five (5) percentage points of the transit system’s percentage of minority and/or low-income riders. Ridership data is the preferred data source; ACS block group data is used when ridership data is not available or applicable.

The following layered maps identify the HRT routes, HRT service area and ACS block groups with total minority and low-income populations greater than the service area average. This information provides a baseline for the analysis of all proposed major service changes.

ACS BLOCK GROUP – MINORITY & LOW-INCOME POPULATIONS



PROPOSED MAJOR SERVICE CHANGE POLICY

The proposed routes, whose service by enhancement, new service, reduction or elimination were identified as major service changes:

- Route **24**
- Route **44**
- MAX Route **967**
- MAX Route **973**
- MAX Route **974**

The addition of the new Route 24, expansion of service for the Route 44 and Metro Area Express (MAX) Route 967 and the elimination of service for the MAX 973 and 974 routes listed above were being considered for October 20, 2019. Changes to the aforementioned routes exceed the 25% Major Service Change Threshold as identified in Hampton Roads Transit 2017-2020 Title VI Program. The Title VI Equity Analysis for the Routes 24, 44 and MAX Routes 967, 973, and 974 reviews the proposed service changes for; potential disparate impacts to minority populations. The review of these route changes also analyzes if there is a disproportionate burden on minority and/or low-income populations. If a disparate impact or disproportionate burden is identified, Hampton Roads Transit is required to provide justification for and reasonable alternatives to the proposed action, and to identify mitigation to avoid or minimize any disparate or disproportionate impact.

It is HRT’s policy to use ACS data and Origin and Destination survey data to analyze Title VI impacts of major service changes whenever that data is available. Data from the 2014 American Community Survey (ACS) and the HRT system-wide survey data from its 2016 Origin & Destination Study was used for this equity analysis.

# **ROUTE 24:**

## **PEMBROKE EAST/ROBERT HALL**

## ROUTE 24: PEMBROKE EAST/ROBERT HALL

### ROUTE OVERVIEW

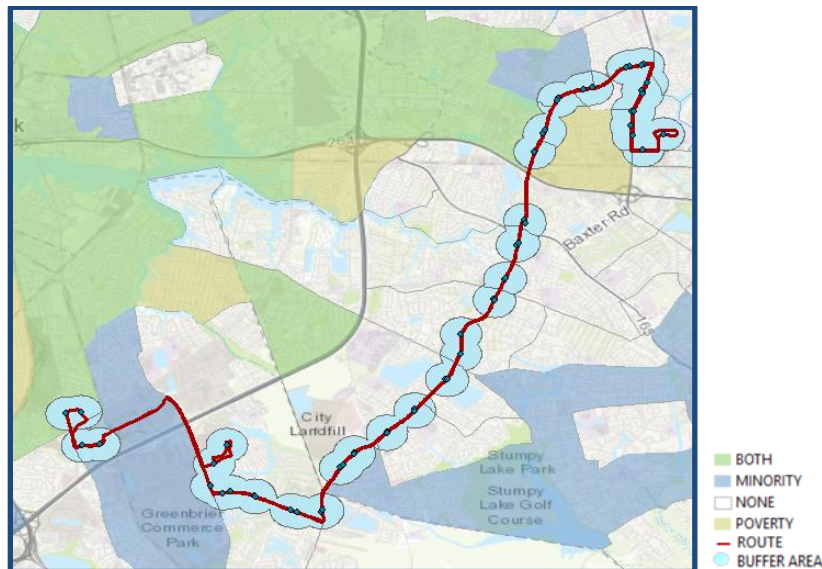
Route 24 (Pembroke East/Robert Hall Hall) will provide service daily between Pembroke East and Robert Hall with a stop at Greenbrier Mall. The route will operate hourly Monday through Saturday from 7:00 am to 10:00 pm. Peak period service will be provided Monday through Friday in 30-minute intervals from 7:00 a.m. – 9:00 a.m. and 4:00 p.m. – 6:00 p.m. The Route 24 will provide service on Sunday from 8:00 a.m. to 7:00 p.m.

The addition of any new route automatically meets the Major Service Change Threshold of 25%; thereby requiring, a Title VI Analysis.

### SERVICE RECOMMENDATION AND JUSTIFICATION

The fixed route service was identified in the FY2018 - FY2027 Transit Development Plan (TDP) as a service expansion in Virginia Beach. The new service would enhance the north-south connections within Virginia Beach via Kempsville Rd. The Witchduck-Kempsville neighborhoods along the Route 24 currently does not have access to transit. In HRT's TDP, this area was identified as having moderate to high propensity for transit-oriented and commuter populations.

**FIGURE 1A: ROUTE 24 MINORITY & LOW-INCOME AMERICAN COMMUNITY SURVEY – BLOCK GROUP MAP**



### DETERMINATION OF IMPACTS –ROUTE 24

The following tables show the proportion of minority and low-income persons impacted by the proposed elimination of the Route 24. HRT's Title VI Program states that if the percentage of minorities potentially affected by an action is greater than 5% of the service area average, then the service change may have a disparate impact. If the percentage of low-income persons potentially affected by an action is greater than 5% of the system area average, then the service change may have a disproportionate burden. HRT service area characteristics and the characteristics of the Route 24 were evaluated using 2014 ACS. Only ACS data was utilized for this Title VI analysis as this is new service and there is no Origin and Destination (O&D) data available.



**TABLE 1A: MINORITY AND LOW-INCOME POPULATIONS WITHIN SERVICE AREA**

	<b>HRT SERVICE AREA ACS DATA</b>	<b>RTE. 24 SERVICE AREA – ACS DATA</b>
<b>MINORITY</b>	47.1%	40.8%
<b>LOW-INCOME</b>	20.5%	6.2%

**TABLE 1B: ANALYSIS FINDINGS SUMMARY**

<b>DATA SOURCE/ TITLE VI POPULATION</b>	<b>ANALYSIS FINDINGS</b>
ACS DATA ANALYSIS MINORITY POPULATIONS	The impact to the population within the service area is greater than the 5% threshold for minority populations utilizing ACS data, by <b>-6.3%</b> .
ACS DATA ANALYSIS LOW-INCOME POPULATIONS	The impact to the population within the service area is greater than the 5% threshold for low-income populations utilizing ACS data, by <b>-14.3%</b> .

Based on the analysis, the proposed service of the Route 24 is not projected to generate a disparate impact to minority populations. Based on the analysis of the ACS data, minorities who are affected by the change is greater than 5%. However, that percentage is 6.3% less than the system’s service characteristics. These impacts do not appear to disproportionately negatively impact minorities.

Based on the analysis, the proposed service of the Route 24 is not projected to create a disproportionate burden to low-income populations. Based on the analysis of the ACS data, the impact to low-income persons is greater than the 5% threshold. However, that percentage is -14.3% lower than the system’s service characteristics. These impacts do not appear disproportionately negatively impact low-income persons.

### **PUBLIC INVOLVEMENT**

Hampton Roads Transit’s Planning and Marketing and Communications departments initiated public outreach activities to engage this part of the service area. HRT communicated with customers and stakeholders regarding the proposed changes and solicited comments and feedback to identify if there were potential impacts to Title VI populations not captured by the analysis.

The Route 24 is a new fixed route service; therefore, the public outreach strategy consisted of traditional and non-traditional methods of outreach and communication. As required by HRT’s Public Participation Plan, a plan was crafted that identifies the public and community’s engagement as it relates to the creation of the Route 24. This includes, but is not limited to, promotion via social media, HRT’s website, distribution of materials, communication at public meetings where individuals/groups may be impacted by this change, and notification at HRT’s Transit Riders Advisory Council (TRAC) meeting, on September 4, 2019 which is also open to the public.

A Public Meeting was held on Wednesday, September 18, 2019 at HRT’s Southside Facility (509 E. 18<sup>th</sup> Street) to solicit feedback and comment. Information regarding the proposed changes was also posted in transit and transfer centers; including methods to contact HRT for more information and/or to provide comment.

**MITIGATION**

No mitigation strategies are needed for the addition of new service of the Route 24. Through the analysis, no negative disparate and/or disproportionate impacts have been identified to Title VI or environmental justice populations.

No disproportionate burden was identified for low-income communities for the Route 24. No mitigation was shown to be required for minority or low-income persons that utilized the fixed route fare type. Hampton Roads Transit performed a Title VI Analysis in 2014 regarding its change in fares to the rates that are in effect at the time of this analysis. Those fares went into effect in October 2017.

Information on the service times for the Route 24 riders was made available to the public (see Appendix C).

# **ROUTE 44**

## **NORFOLK SENTARA GENERAL HOSPITAL / MIDTOWN PORTSMOUTH**

## Route 44: Norfolk General Hospital/Midtown Portsmouth

### ROUTE OVERVIEW

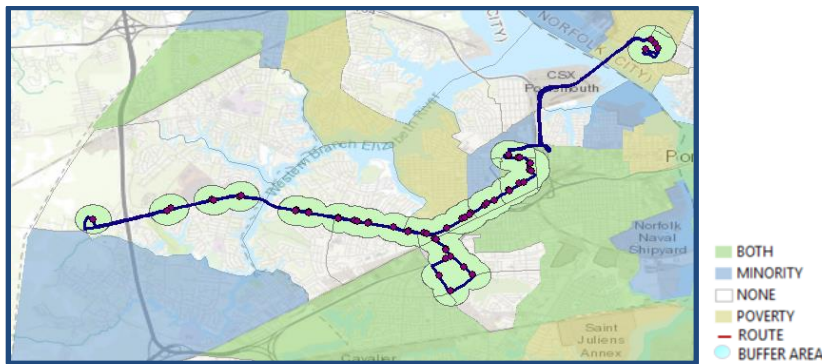
Route 44 (Oyster Point) provides service Monday through Friday between Norfolk General Hospital and Victory Crossing with a stop at High Street and Florida Avenue. Monday through Friday service operates hourly from 6:05 AM to 10:02 PM and Saturday from 7:03 AM to 10:01 PM. The Route 44 will provide Sunday service from 7:00 AM to 7:00 PM.

The addition of service is above the Major Service Change Threshold of 25%; therefore, a Title VI Analysis is required.

### SERVICE RECOMMENDATION AND JUSTIFICATION

The recommendation from the City of Portsmouth was to implement service on Sunday from 7:00 AM to 7:00 PM. Presently, there is no Sunday service on the Route 44. The recommended change, the addition of Sunday service, would be effective October 20, 2019.

**FIGURE 2A: MAX ROUTE 44 MINORITY & LOW-INCOME ACS BLOCK GROUP MAP**



### DETERMINATION OF IMPACTS – ROUTE 44

The following tables show the proportion of minority and low-income persons impacted by the proposed addition of service of the Route 44. HRT’s Title VI Program states that if the percentage of minorities potentially affected by an action is greater than 5% of the service area average, then the service change may have a disparate impact. If the percentage of low-income persons potentially affected by an action is greater than 5% of the system area average, then the service change may have a disproportionate impact. If the percentage of low-income people potentially affected by an action is greater than 5% of the system area average, then the service change may have a disproportionate burden. HRT service area characteristics and the characteristics of the Route 44 were evaluated using 2016 Origin and Destination Survey Data. Origin and Destination data was utilized for this Title VI analysis.

**TABLE 2A: MINORITY AND LOW-INCOME POPULATIONS WITHIN SERVICE AREA**

	<b>HRT RIDERS O&amp;D SURVEY</b>	<b>RTE. 44 RIDERS O&amp;D SURVEY</b>
<b>MINORITY</b>	73.4%	81.2%
<b>LOW-INCOME</b>	69.4%	75.4%

**TABLE 2B: ANALYSIS FINDINGS SUMMARY**

<b>DATA SOURCE/ TITLE VI POPULATION</b>	<b>ANALYSIS FINDINGS</b>
O&D ANALYSIS MINORITY POPULATIONS	The impact to the population utilizing the service is greater than the 5% threshold for minority populations utilizing O&D survey data <b>7.8%</b> utilizing O&D data for Route 44.
O&D ANALYSIS LOW-INCOME POPULATIONS	The impact to the population utilizing the service is greater than the 5% threshold for low-income populations utilizing O&D survey data by <b>6%</b> utilizing O&D data for Route 44.

Based on the analysis, proposed changes to Route 44 are not projected to generate a disparate impact to minority populations.

Based on O&D data analysis, those minorities who are affected by the change is greater than 5%. The percentage is 7.8% higher than the system’s service characteristics. These impacts do not appear to disproportionately negatively impact minorities. The addition of Sunday service provides a benefit to the minority population in the service area.

Based on the analysis, proposed changes to the Route 44 are not projected to create a disproportionate burden to low-income populations. Based on O&D data analysis, those low-income persons who are affected by the change is greater than 5%. That percentage is 6% greater than the system’s service characteristics. These impacts appear to positively benefit low-income persons. The addition of Sunday service provides a benefit that is higher that the low-income population in the service area.

**PUBLIC INVOLVEMENT**

Hampton Roads Transit’s Planning and Marketing and Communications departments initiated public outreach activities to engage this part of the service area. HRT communicated with customers and stakeholders regarding the proposed changes and solicited comments and feedback to identify if there were potential impacts to Title VI populations not captured by the analysis.

The Route 44 is a fixed route service; therefore, the public outreach strategy consisted of traditional and non-traditional methods of outreach and communication. As required by HRT’s Public Participation Plan, a plan was crafted that identifies the public and community’s engagement as it relates to the expansion of service fort the Route 44. This includes, but is not limited to, promotion via social media, HRT’s website, distribution of materials on the bus, communication at public meetings where individuals/groups may be impacted by this change, and notification at HRT’s Transit Riders Advisory Council (TRAC) meeting on September 4, 2019, which is also open to the public.

A Public Meeting was held on Wednesday, September 18, 2019 at HRT’s Southside Facility (509 E. 18<sup>th</sup> Street) to solicit feedback and comment. Information regarding the proposed changes was also posted in transit and transfer centers; including methods to contact HRT for more information and/or to provide comment.

**MITIGATION**

No mitigation strategies are proposed for the addition of Sunday service for the Route 44. Through the analysis, no negative disparate and/or disproportionate impacts have been identified to Title VI or environmental justice populations.

No disproportionate burden was identified for low-income communities for Route 44. No mitigation was shown to be required for minority or low-income persons that utilized the fare type. Hampton Roads

Transit performed a Title VI Analysis in 2014 regarding its change in fares to the rates that are in effect at the time of this analysis. Those fares went into effect in October 2017.

Information on the service times for the Route 44 riders was made available to the public (see Appendix C).

# **MAX ROUTE 967**

## **VIRGINIA BEACH, CHESAPEAKE, NEWPORT NEWS**

## MAX Route 967: VIRGINIA BEACH, CHESAPEAKE, NEWPORT NEWS

### ROUTE OVERVIEW

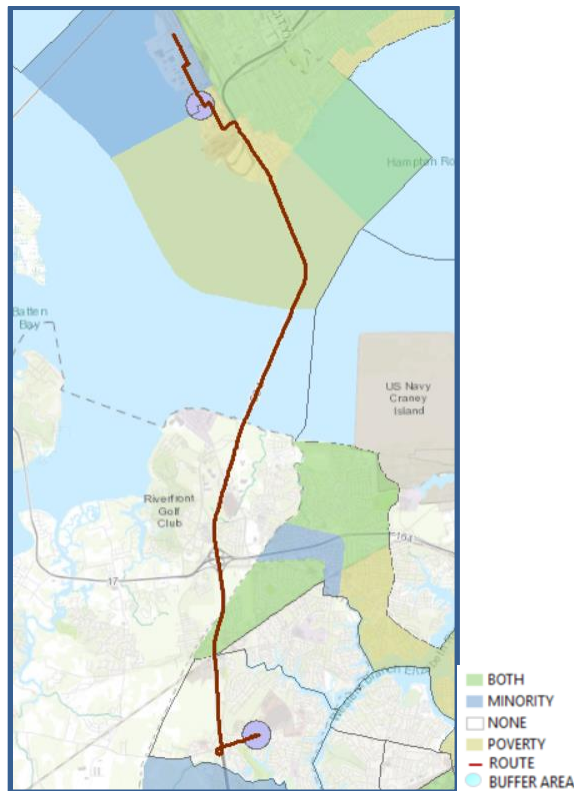
MAX Route 967 will provide an additional express trip for service from Newport News Shipbuilding (North Gate) and terminate at Chesapeake Center. Service is provided Monday through Friday; this trip will begin operation at 3:40 p.m., departing from Newport News Shipyard.

The addition of a new trip is above the Major Service Change Threshold of 25%; therefore, a Title VI Analysis is required.

### SERVICE RECOMMENDATION AND JUSTIFICATION

The additional trip for the MAX Route 967 express service is necessary due to overcrowding on the current service available.

**FIGURE 3A: MAX ROUTE 967 MINORITY & LOW-INCOME ACS BLOCK GROUP MAP**



### DETERMINATION OF IMPACTS – MAX ROUTE 967

The following tables show the proportion of the minority and low-income persons impacted by the proposed expansion of the MAX Route 967. HRT's Title VI Program states that if the percentage of minorities potentially affected by an action is greater than 5% of the service area average, then the service change may have a disparate impact. If the percentage of low-income people potentially affected by an action is greater than 5% of the system area average, then the service change may have a disproportionate burden. HRT service area characteristics and the characteristics of the Route 967 were evaluated using 2016 Origin and Destination Survey Data.



**TABLE 3A: MINORITY AND LOW-INCOME POPULATIONS WITHIN SERVICE AREA**

	<b>HRT RIDERS O&amp;D SURVEY</b>	<b>MAX RTE. 967 SERVICE AREA</b>
<b>MINORITY</b>	73.4%	40.0%
<b>LOW-INCOME</b>	69.4%	36.6%

**TABLE 3B: ANALYSIS FINDINGS SUMMARY**

<b>DATA SOURCE/ TITLE VI POPULATION</b>	<b>ANALYSIS FINDINGS: MAX 967</b>
ANALYSIS MINORITY POPULATIONS	The impact to the population within the service area is lower than the 5% threshold for minority populations utilizing O&D Data, at <b>-33.4%</b> .
ANALYSIS LOW-INCOME POPULATIONS	The impact to the population within the service area is less than the 5% threshold for low-income populations utilizing ACS data, by <b>-32.8%</b> .

The analysis of the O&D data shows minorities who are affected by the change is greater than 5% threshold. Based on the analysis, proposed changes to MAX Route 967 are not projected to generate a disparate impact to minority populations as an expansion of service is being offered and the addition of service would provide a benefit to minorities.

Based on the analysis, proposed changes to the MAX Route 967 are not projected to create a disproportionate burden to low-income populations. Based on the analysis of the ACS data, the impact to low-income persons is within the 5% threshold. Based on O&D data analysis, those low-income persons who are affected by the change is greater than 5%. These impacts do not appear disproportionately negatively impact low-income persons.

### **PUBLIC INVOLVEMENT**

Hampton Roads Transit’s Planning and Marketing and Communications departments initiated public outreach activities to engage this part of the service area. HRT communicated with customers and stakeholders regarding the proposed changes and solicited comments and feedback to identify if there are potential impacts to Title VI populations not captured by the analysis.

The Route 967 is an express service; therefore, the public outreach strategy consisted of traditional and non-traditional methods of outreach and communication. As required by HRT’s Public Participation Plan, a plan has been crafted that identifies the public and community’s engagement as it relates to service for the Route 967. This includes, but is not limited to, promotion via social media, HRT’s website, ACS, communication at public meetings where individuals/groups may be impacted by this change, formal communications to Shipyard liaisons, distribution of materials on the bus, and notification at HRT’s Transit Riders Advisory Council (TRAC) meeting, which is also open to the public.

A Public Meeting was held on Wednesday, September 18, 2019 at HRT’s Southside Facility (509 E. 18<sup>th</sup> Street) to solicit feedback and comment. Information regarding the proposed changes was also posted in transit and transfer centers; including methods to contact HRT for more information and/or to provide comment.

### **MITIGATION**

No mitigation strategies are proposed for the addition of new service of the MAX Route 967. Through the analysis, no negative disparate and/or disproportionate impacts have been identified to Title VI or environmental justice populations.

No disproportionate burden was identified for low-income communities for MAX Route 967. No mitigation was shown to be required for minority or low-income persons that utilized the MAX fare type. Hampton Roads Transit performed a Title VI Analysis in 2014 regarding its change in fares to the rates that are in effect at the time of this analysis. Those rates went into effect in October 2017.

Information on the service times for morning and afternoon trips for MAX 967 riders was made available to the public (see Appendix C).

# **MAX ROUTE 973**

**TIDEWATER COMMUNITY COLLEGE  
(PORTSMOUTH) –  
NAVAL STATION NORFOLK**

**ROUTE OVERVIEW**

MAX Route 973 (Tidewater Community College (Portsmouth)) provides express service from Chesapeake Center in Chesapeake to Naval Station Norfolk. Two morning and two afternoon trips are provided Monday through Friday.

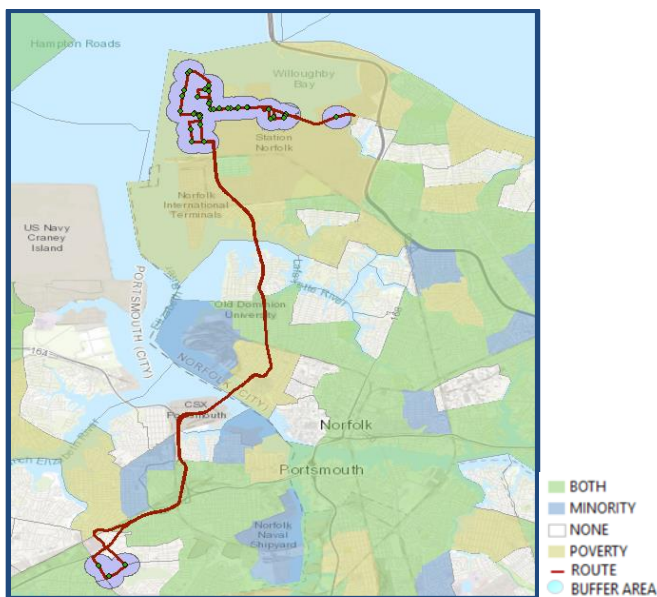
The discontinuation of service is above the Major Service Change Threshold of 25%; therefore, a Title VI Analysis is required.

**SERVICE RECOMMENDATION AND JUSTIFICATION**

The recommendation is to discontinue service due to low route productivity/ridership, and the service not meeting the required performance standards for MAX service as identified in Hampton Roads Transit's Service Standards and Performance Policy (PD-112). For MAX service the minimum passenger per boarding for a one-way trip is 20 passengers. The recommended change would be effective October 21, 2019.

**TABLE 4A: ROUTE 973 RIDERSHIP**

TRIP TIMES	PASSENGERS PER TRIP
5:00 AM	2
6:00 AM	1
3:30 PM	2
4:30 PM	2

**FIGURE 4A: MAX ROUTE 973 MINORITY & LOW-INCOME ACS BLOCK GROUP MAP**

**DETERMINATION OF IMPACTS – MAX ROUTE 973**

The following tables show the proportion of minority and low-income persons impacted by the proposed elimination of service for the MAX Route 973. HRT's Title VI Program states that if the percentage of minorities potentially affected by an action is greater than 5% of the service area average, then the service change may have a disparate impact. If the percentage of low-income persons potentially affected by an action is greater than 5% of the system area average, then the service change may have a disproportionate

burden. HRT service area characteristics and the characteristics of the MAX Route 973 were evaluated using 2014 ACS data. ACS data was utilized as Origin and Destination data was not available for the Title VI analysis for this route.

**TABLE 4B: MINORITY AND LOW-INCOME POPULATIONS WITHIN SERVICE AREA**

	<b>HRT SERVICE AREA ACS</b>	<b>MAX RTE. 973 SERVICE AREA ACS</b>
<b>MINORITY</b>	47.1%	47.0%
<b>LOW-INCOME</b>	20.5%	26.7%

**TABLE 4C: ANALYSIS FINDINGS SUMMARY**

<b>DATA SOURCE/ TITLE VI POPULATION</b>	<b>ANALYSIS FINDINGS</b>
ACS ANALYSIS MINORITY POPULATIONS	The impact to the population within the service area is greater than the 5% threshold for minority populations utilizing Census data, by <b>-0.1%</b> .
ACS ANALYSIS LOW-INCOME POPULATIONS	The impact to the population within the service area is less than the 5% threshold for low-income populations utilizing Census data, by <b>6.2%</b> .

Based on the analysis, proposed elimination of service for MAX Route 973 are not projected to generate a disparate impact to minority populations. Based on the analysis of the ACS data, minorities who are affected by the change is less than 5%. That percentage is -0.1% lower than the system’s service characteristics. These impacts do not appear to disproportionately negatively impact minorities.

Based on the analysis, proposed addition of new service for the MAX Route 973 are projected to create a negative disproportionate burden to low-income populations. Based on the analysis of the Census data, the impact to low-income persons is greater than the 5% threshold. That percentage is 6.2% higher than the system’s service characteristics. These impacts appear disproportionately negatively impact low-income persons.

**PUBLIC INVOLVEMENT**

Hampton Roads Transit’s Planning and Marketing and Communications departments initiated public outreach activities to engage this part of the service area. HRT communicated with customers and stakeholders regarding the proposed changes and solicited comments and feedback to identify if there are potential impacts to Title VI populations not captured by the analysis.

The Route 973 is an express service; therefore, the public outreach strategy consisted of traditional and non-traditional methods of outreach and communication. As required by HRT’s Public Participation Plan, a plan has been crafted that identifies the public and community’s engagement as it relates to service for the Route 973. This includes, but is not limited to, promotion via social media, HRT’s website, communication at public meetings where individuals/groups may be impacted by this change, formal communications to Military liaisons, distribution of materials on the bus, and notification at HRT’s Transit Riders Advisory Council (TRAC) meeting on September 4, 2019, which is also open to the public. Meetings with key stakeholders; including riders whose destination is the Naval Base were also engaged in a meeting at the Navy Base.

A Public Meeting was held on Wednesday, September 18, 2019 at HRT's Southside Facility (509 E. 18<sup>th</sup> Street) to solicit feedback and comment. Information regarding the proposed changes was also posted in transit and transfer centers; including methods to contact HRT for more information and/or to provide comment.

### **MITIGATION**

Though through the analysis, no disparate have been identified for minority persons. HRT performed a Title VI Analysis on Fare Changes that evaluated the implementation of associated fares, including MAX service (see document – Title VI Fare Analysis – Final). MAX service is an express service with a premium fare. Passengers will still have access to their origin and destination via fixed route service at a total trip cost of \$4.50, which is a lower cost than the premium fare of MAX service at \$7.50.

Through outreach efforts and interviewing passengers those riders identified utilizing the service received a funds from the federal government which subsidizes their costs for the MAX fare. HRT provides outreach and awareness of this program through its Travel Demand Management Program – TRAFFIX, and efforts were made to continue to promote the TIP program, for both minority and low-income persons who may be impacted by the route elimination. The Transportation Incentive Program (TIP) is intended to reduce Federal employees' contribution to traffic congestion and air pollution, and to expand their commuting alternatives. The Department of Transportation (DOT), on behalf of Department of Defense (DOD), purchases and distributes transit vouchers and/or fare media for Department of the Navy (DON) participants. All Navy and Marine Corps military members and federal DON civilian employees, including Non-appropriated Fund (NAF) employees; part-time federal employees and interns; and reservists on active duty for more than 30 days are entitled to the same benefits and are to apply for this benefit in the same manner as is applicable to members/employees in the same geographic area are eligible to receive this fringe benefit. Acceptable methods of mass transportation include commuter bus/train, ferry (foot passenger only), vanpool and subway/light rail. Eligible commuters may receive up to \$260 a month for commuter expenses.

### **Transit Options**

Riders of the MAX Route 973 will have access to the TRAFFIX program for commuters which include carpool and vanpool options.

In order to access Tidewater Community College Park & Ride from Naval Station Norfolk by bus current 973 riders would need to take the following buses.

- Route 21 - From Naval Station Norfolk to the Navy Exchange Mall (No access via Route 21 from the air station side of the base – closest bus stop is at Gilbert Street & Bainbridge Avenue)
- Route 2 – From the Navy Exchange Mall to Sentara Norfolk General Hospital
- Route 44 – From Sentara Norfolk General Hospital to Victory Crossing Transfer Location
- Route 50 – From Victory Crossing Transfer Location to Tidewater Community College

Note: Passengers can choose to walk from Victory Crossing Transfer Location to Tidewater Community College and eliminate the transfer to Route 50.

# **MAX ROUTE 974**

**CHESAPEAKE CENTER –  
NAVAL STATION NORFOLK**

**ROUTE OVERVIEW**

Route 974 (Chesapeake Center – Naval Station Norfolk) provides express service from Chesapeake Center in Chesapeake to Naval Station Norfolk. Two morning and two afternoon trips are provided Monday through Friday.

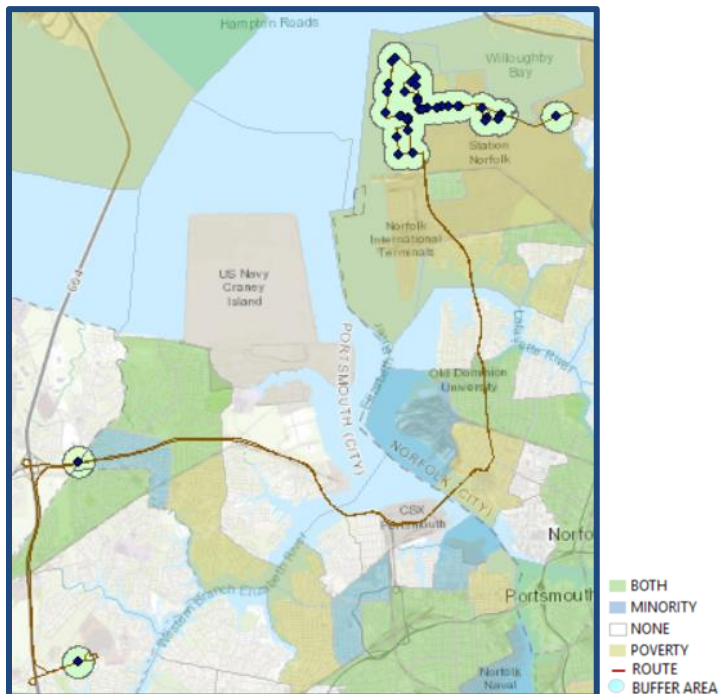
The proposed elimination of service is above the Major Service Change Threshold of 25%; therefore, a Title VI Analysis is required.

**SERVICE RECOMMENDATION AND JUSTIFICATION**

The recommendation is to discontinue service due to low route productivity/ridership, and the service not meeting the required performance standards for MAX service as identified in Hampton Roads Transit’s Service Standards and Performance Policy (PD-112). For MAX service the minimum passenger per boarding for a one-way trip is 20 passengers. The recommended change would be effective October 21, 2019.

**TABLE 5A: ROUTE 974 RIDERSHIP**

TRIP TIMES	PASSENGERS PER TRIP
5:00 AM	3
6:00 AM	4
3:40 PM	6
4:20 PM	2

**FIGURE 5A: ROUTE 974 MINORITY & LOW-INCOME ACS BLOCK GROUP MAP**

**DETERMINATION OF IMPACTS – MAX ROUTE 974**

The following tables show the proportion of minority and low-income persons impacted by the proposed addition of service for the MAX Route 974. HRT’s Title VI Program states that if the percentage of minorities potentially affected by an action is greater than 5% of the service area average, then the service



change may have a disparate impact. If the percentage of low-income persons potentially affected by an action is greater than 5% of the system area average, then the service change may have a disproportionate burden. HRT service area characteristics and the characteristics of the MAX Route 974 were evaluated using 2014 ACS data. ACS data was utilized as Origin and Destination data was not available for this Title VI analysis.

**TABLE 5B: MINORITY AND LOW-INCOME POPULATIONS WITHIN SERVICE AREA**

	<b>HRT SERVICE AREA ACS</b>	<b>MAX RTE. 974 SERVICE AREA ACS</b>
<b>MINORITY</b>	47.1%	44.8%
<b>LOW-INCOME</b>	20.5%	25.0%

**TABLE 5C: ANALYSIS FINDINGS SUMMARY**

<b>DATA SOURCE/ TITLE VI POPULATION</b>	<b>ANALYSIS FINDINGS</b>
ACS ANALYSIS MINORITY POPULATIONS	The impact to the population within the service area is within the 5% threshold for minority populations utilizing ACS data, by <b>-2.3%</b> .
ACS ANALYSIS LOW-INCOME POPULATIONS	The impact to the population within the service area is less than the 5% threshold for low-income populations utilizing ACS data, by <b>4.5%</b> .

Based on the analysis, proposed elimination of service for MAX Route 974 are not projected to generate a disparate impact to minority populations. Based on the analysis of the ACS data, minorities who are affected by the change is less than 5%. That percentage is 2.3% lower than the system’s service characteristics. These impacts do not appear to disproportionately negatively impact minorities.

Based on the analysis, proposed addition of new service for the MAX Route 974 are not projected to create a negative disproportionate burden to low-income populations. Based on the analysis of the ACS data, the impact to low-income persons is within than the 5% threshold. That percentage is 4.5% higher than the system’s service characteristics. These impacts do not appear disproportionately negatively impact low-income persons as new service is being offered and the addition of service would provide a benefit to low-income persons.

**PUBLIC INVOLVEMENT**

Hampton Roads Transit’s Planning and Marketing and Communications departments initiated public outreach activities to engage this part of the service area. HRT communicated with customers and stakeholders regarding the proposed changes and solicited comments and feedback to identify if there are potential impacts to Title VI populations not captured by the analysis.

The Route 974 is an express service; therefore, the public outreach strategy consisted of traditional and non-traditional methods of outreach and communication. As required by HRT’s Public Participation Plan, a plan has been crafted that identifies the public and community’s engagement as it relates to service for the Route 974. This includes, but is not limited to, promotion via social media, HRT’s website, communication at public meetings where individuals/groups may be impacted by this change, formal communications to Military liaisons, distribution of materials on the bus, and notification at HRT’s Transit Riders Advisory Council (TRAC) meeting, which is also open to the public. Meetings with key stakeholders; including riders whose destination is the Naval Base were also engaged in a meeting at the Navy Base.

A Public Meeting was held on Wednesday, September 18, 2019 at HRT's Southside Facility (509 E. 18<sup>th</sup> Street) to solicit feedback and comment. Information regarding the proposed changes was also posted in transit and transfer centers; including methods to contact HRT for more information and/or to provide comment.

#### **MITIGATION**

No mitigation strategies are proposed for the addition of new service of the MAX Route 974. Through the analysis, no negative disparate and/or disproportionate impacts have been identified to Title VI or environmental justice populations.

No disproportionate burden was identified for low-income communities for MAX Route 974. No mitigation was shown to be required for minority or low-income persons that utilized the MAX fare type. Hampton Roads Transit performed a Title VI Analysis in 2014 regarding its change in fares to the rates that are in effect at the time of this analysis. Those rates went into effect in October 2017.

Information on the service times for morning and afternoon trips for MAX 974 riders was made available to the public (see Appendix C).

# **APPENDIX A**

## **PUBLIC MEETING COMMENTS/ MEETING NOTES PUBLIC MEETING SIGN-IN SHEETS**



**PUBLIC MEETING NOTES: SERVICE CHANGES**

**Date:** September 4, 2019  
**Location:** HRT's Southside Facility – 509. E 18<sup>th</sup> St.  
**Number of Attendees:** 7 signed-in  
**Service Impacted:** Route 24, 44, MAX Service 967, 973,974

**SUMMARY**

- No comments received

**Date:** September 18, 2019  
**Location:** HRT's Southside Facility – 509. E 18<sup>th</sup> St.  
**Number of Attendees:** 10 signed-in  
**Service Impacted:** Route 24, 44, MAX Service 967, 973,974

**SUMMARY****MAX ROUTE 974: CHESAPEAKE CENTER – NAVAL STATION NORFOLK**

- Customer provided recommendation to combine the 973 and 974 together to start at Victory Crossing, to Chesapeake Square, and Military Highway.
- Inquiry regarding the minimum ridership threshold for MAX service.
- Provide advertisement of MAX service that do not just show military personnel, but show depictions of civilians as well.

# **APPENDIX C**

## **PUBLIC OUTREACH REPORT**

### **COMMUNICATIONS/COLLATERAL MATERIALS**

**Public Outreach/Communications – Routes 24, 44 and MAX Routes 967, 973, 974**

Beginning in August, the Service Planning Department distributed information to Public Outreach staff of proposed changes/increase/eliminations and addition of new service for the Routes 24, 44, 967, 973 and 974. Public meetings were scheduled in order to receive comment and feedback from riders who could be impacted by proposed changes.

The following meetings were scheduled:

Routes 24, 44, 967, 973 and 974  
Wednesday, September 4, 2019 from 6:00-7:00 pm  
Transit Riders Advisory Council Meeting  
Hampton Roads Transit Headquarters  
3400 Victoria Blvd., Hampton, VA 23661

Routes 24, 44, 967, 973 and 974  
Thursday, September 18, 2018 from 4:00-5:30 pm  
Hampton Roads Transit Southside Facility  
509 E. 18<sup>th</sup> St., Norfolk, VA 23504

Flyers with information with details regarding the public meetings on distributed on transit vehicles. Notifications were also posted to the HRT Website. Information on the proposed changes was shared with Customer Service staff.

Formal letters and parallel electronic communications were sent to Communications were also sent to military and affiliate companies whose employees could be impacted by the service change changes and/or new service. This included Huntington Ingalls Industries, Naval Support Activity Hampton Roads, and Naval Station Norfolk.

The TRAC meeting at HRT's Headquarters in September 4<sup>th</sup>, had appx. 7 attendees who signed in. The meeting at HRT Headquarters on September 18<sup>th</sup>, had 10 attendees. HRT Staff attending included representatives from Planning staff.

Attendees were given flyers that gave specific information on the proposed changes for each of these routes. There was good dialog from those who attended; however, the comments featured a desire to keep the service by civilian personnel who worked at the base, and who also had cars. General comments on how to promote MAX service were also provided; Jamie Jackson, Director of Transit Development, took notes and asked all in the room for comments/questions and recorded all information that was shared. Also, blank comment forms were available for people to write comments.

END OF DOCUMENT