



HAMPTON ROADS TRANSIT

Title VI Equity Analysis

for the Proposed HRT Fare Reduction for MAX Route 960 and MAX Route 961

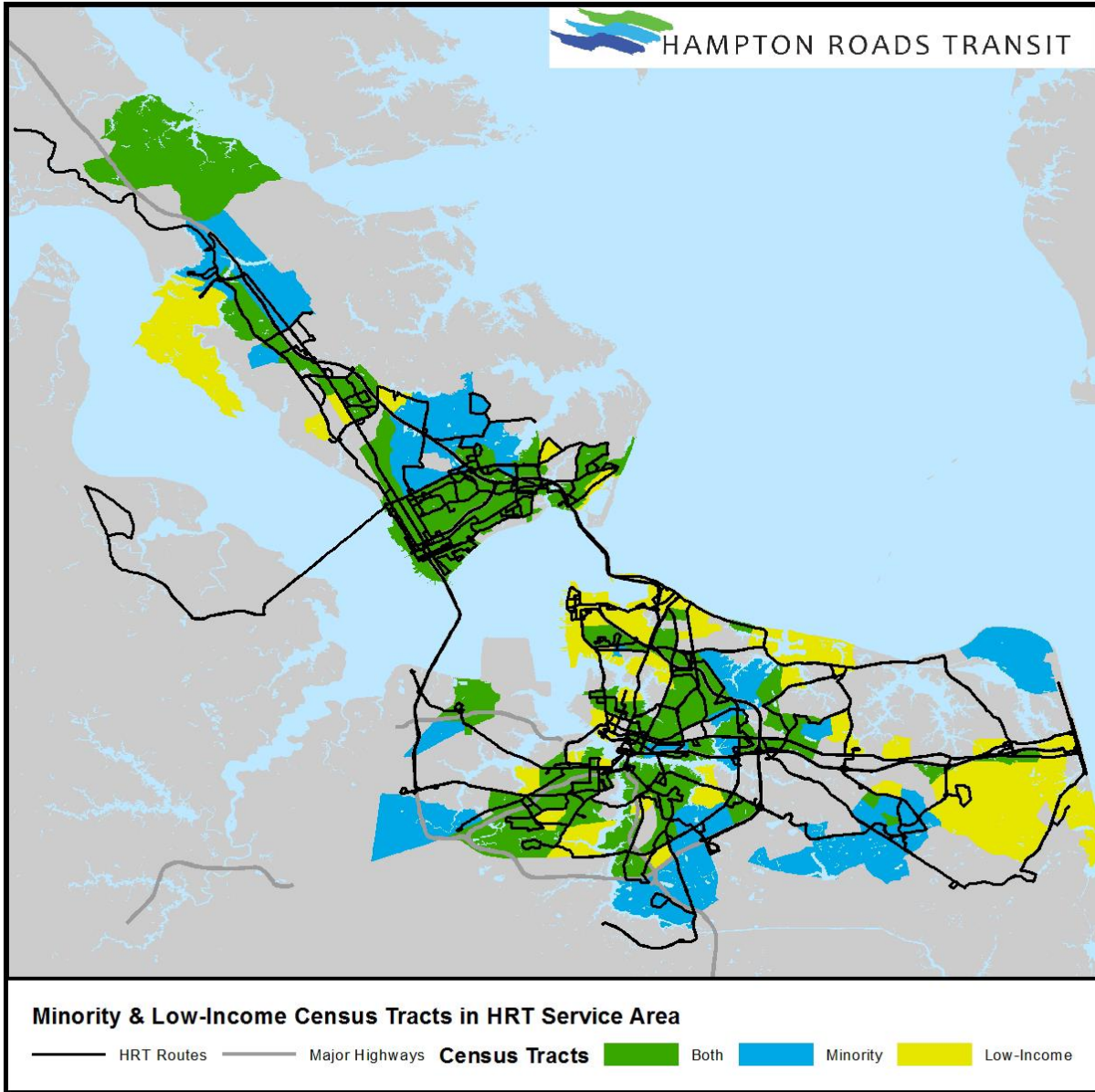
Introduction

As part of the Civil Rights Act of 1964, Title VI is intended to ensure equity and equal access in the provision of public transportation services regardless of race, age, national origin, or socioeconomic condition. Transit agencies receiving federal funds must comply with Title VI requirements to continue receiving funding. Hampton Roads Transit (HRT), as a recipient of Federal funds, must comply with Title VI requirements.

HRT is proposing to reclassify MAX route 960 and MAX route 961 from MAX routes to *Limited Stop Commuter Service*. Because of the nature of the reclassification, HRT is proposing that the fare amount for the two routes be *decreased* to reflect the reclassification of the route. The service provided by the two routes will not change. The proposed fare decrease would go into effect in the Fall of 2021. As per the Title VI program, HRT is required to conduct a fare impact analysis and determine if the proposed fare change would result in any disparate or disproportionate impacts on minority and low-income populations respectively.

Definition of Service Area

Hampton Road Transit's (HRT) service area includes the cities of Chesapeake, Hampton, Newport News, Norfolk, Portsmouth, and Virginia Beach. The map below shows the distribution of low-income and minority populations in the service area, as well as HRT routes.



MAX Route 960 currently provides service from the Downtown Norfolk Transfer Center (DNTC) to the Virginia Beach Oceanfront (Arctic Avenue and 19th Street). Max Route 961 currently provides service from the Downtown Norfolk Transfer Center (DNTC) to Hampton/Newport News and Newport News Shipbuilding.

Fare Impact Methodology

HRT’s methodology to conduct fare impact analysis is consistent with the guidance set forth is



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FTA's Circular, FTA C470.2.1B, Chapter IV-19, published on October 1, 2012. The procedure consists of the following steps.

1. Define the Service Area covered by HRT system.
2. 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.
3. 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.
4. Repeat Step 3 by replacing the current fare structure by the proposed fare structure.
5. Determine percent increase in fares for minorities, non-minorities, low-income and non-low-income populations in the Service Area.
6. If the percent differences in fare increase for minorities versus non-minorities and low-income versus non-low income populations are within the thresholds established by HRT board, a determination of "No impacts" will be made. If the estimated differences exceed HRT's 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.
7. HRT will present the proposed fare change and results of the equity analysis for meaningful public involvement as defined by the public participation plan.
8. 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:
9. HRT has a substantial legitimate justification for the proposed fare change, and
10. 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.
11. 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.



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Fare Impact Threshold

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.

Proposed Fare Structures

The proposed fare change will result in fare reductions for those who utilize service on MAX Routes 960 and 961. Table 1 below, details the proposed fare amounts by fare type. HRT proposed fare change that will decrease the amount of fares on what is currently know as MAX route 960 and MAX route 961. The average decrease of 54% over current fares is proposed to be implemented in the Fall of 2021. This proposed decreased fare structure, will be put forth for public comment and review. After that time, this analysis will be updated to reflect public comments, questions and concerns pertaining to the proposed fare change.

Table 1: Existing & Proposed Fares for Routes 960 & 961

Fare Type	Existing Fare for Routes 960 & 961	Proposed Fare for Routes 960 & 961	% Change by fare type
Adult Single Trip (Cash)	\$4.00	\$2.00	-50%
Adult Single Trip DF* (Cash)	\$2.00	\$1.00	-50%
GoPass 1-Day	\$7.50	\$4.50	-60%
GoPass 30-Day	\$125.00	\$70.00	-56%
Average Fare Increase			-54% (With the proposed changes, the fare costs will decrease)

* Discounted Fare

Fare Analysis

The 2016 O-D survey indicates 73 percent of HRT transit users belong to a minority group and 69 percent are low-income (see Table 2). Additionally, Table 2 provides the percentage of



minority and low income riders for the entire bus system, all MAX Routes as well as individual MAX route percentages for routes 960 and 961. Route 961 has a higher percentage of minority riders, at 86%, than any other mode listed in the table, additionally, the Origin and Destination survey found that 100% of the riders on Route 960 are considered low income.

Table 2: Minority and Low Income Riders

Transit Mode	Percent Minority	Percent Low Income
System Wide	73%	69%
Bus	78%	74%
MAX	70%	60%
MAX Route 960	58%	100%
MAX Route 961	86%	73%

Table 3 shows the calculation of average fares by fare type for minority and low-income users. The table presents the different steps involved in estimating the percent fare increase. Since this fare change analysis is only for two MAX routes, the same calculations apply to each fare type for the MAX routes relative to the system averages.

Disparate Impact

The analysis for Route 960 and Route 961 shows that the proposed fare change will not have a disparate impact on minority users. Although minority users on route 961 make up 27% more than the system average, the proposed fare change will be a *reduction*. This reduction will not create a disparate impact.

Disproportionate Burden

The analysis for Route 960 and Route 961 shows that the proposed fare change will not have a disproportionate burden on low income users. Although low income users on route 960 make up 31% more than the system average, the proposed fare change will be a *reduction*. This reduction will not create a disproportionate burden.



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Mitigation Strategies

Since the analysis resulted in a finding of “No Impacts”, no mitigation strategies are proposed

Table 3: Fare Change Analysis Calculation

Fare Type	Existing	Proposed	% Change by Fare Type	% Fare Increase Above the System Average (-54%)	% of Minority Users Above the System Average of 73% (Percentages for Routes 960 and 961 regardless of fare type)		% of Low-Income Users Above System Average of 69% (Percentages for Routes 960 and 961 regardless of fare type)		Minority Disparate Impact	Low Income Disp. Burden
					Rte.960	Rte.961	Rte. 960	Rte. 961		
Adult Single Trip (Cash)	\$4.00	\$2.00	-50%	4	Rte.960	Rte.961	Rte. 960	Rte. 961	No	No
					-15%	27%	31%	4%		
Adult Single Trip DF* (Cash)	\$2.00	\$1.00	-50%	4					No	No
GoPass 1-Day	\$7.50	\$4.50	-60%	-6					No	No
GoPass 30-Day	\$125.00	\$70.00	-56%	-2					No	No

Public Outreach Summary

At the time of this report, public outreach has yet to be conducted. The HRT Title VI Program Coordinator has worked with HRT's offices of Communications and Technology to post information and to inform the general public of two upcoming information sessions about the fare change.

Public outreach will involve public comment being available for 30 days online or in writing.

Public Hearings Dates and Times

HRT will hold information sessions for the general public about the proposed fare change. These sessions will provide opportunity for the public to provide feedback on the proposed changes. Attendees can learn more about the proposed fare change, review the fare equity analysis, talk with HRT staff about the changes and provide written comments. The staff will be available at the following dates, times and locations.

- Hampton Transfer Center (HTC)
Tuesday, June 22, 2021
1:00 p.m. to 3:00 p.m.
- Downtown Norfolk Transit Center (DNTC)
Thursday, June 24, 2021
7:30 a.m. to 9:30 a.m.

Once the public comment period is completed, the analysis will be updated with the received information and it will be presented to the HRT Board of Commissioners for review.