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## **MAJOR SERVICE CHANGE & SERVICE EQUITY POLICY**

### **Purpose of the Policy**

The purpose of the Major Service Change and Service Equity Policy is to define thresholds for determining major service changes and whether potential changes to existing transit services will have a disparate impact based on race, color, or national origin, or whether potential service changes will have a disproportionately high or adverse impact on minority and/or low-income populations.

### **Basis for Policy Standards**

Federal law requires the City of Phoenix and Valley Metro to evaluate changes to transit services, as outlined in FTA Circular 4702.1B, effective October 1, 2012. In order to comply with 49 CFR Section 21.5(b)(a), 49 CFR Section 21.5 (b)(7) and Appendix C to 49 CFR part 21, recipients shall “evaluate significant system-wide service and fare changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory impact. For service changes, this requirement applies to ‘major service changes’ only. The recipient should have established guidelines or threshold for what it considers a ‘major’ change to be.”

### **Major Service Change Policy**

#### **A. Major Service Change**

The following is considered a major service change (unless otherwise noted under Exemptions), and will be evaluated in accordance with the regulatory requirements set forth in FTA Circular 4702.1B:

##### **1. Route-Level Service Reduction or Elimination**

- Reducing an existing route by more than 25% of weekday route revenue miles<sup>1</sup>, or

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

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- Reducing an existing route by more than 25% of Saturday route revenue miles<sup>1</sup>, or
  - Reducing an existing route by more than 25% of Sunday route revenue miles<sup>1</sup>, or
  - Reducing the number of route directional miles more than 25%<sup>1</sup>, or
  - A change in a route alignment resulting in a 25% or greater variance from the existing route alignment<sup>1</sup>, or
  - In situations where service would be reduced or eliminated in jurisdictions where minority and/or low-income populations exceed the transit system service area average.

## **2. Route-Level Expansion or Addition of a New Route**

- Adding a new route, or
- Expansion of an existing route that increases weekday route revenue miles by more than 25%<sup>1</sup>, or
- Expansion of an existing route that increases Saturday route revenue miles by more than 25%<sup>1</sup>, or
- Expansion of an existing route that increases Sunday route revenue miles by more than 25%<sup>1</sup>, or
- Expanding the number of route directional miles more than 25%<sup>1</sup>, or
- A change in a route alignment resulting in a 25%<sup>1</sup> or greater variance from the existing route alignment.

## **B. Minority Disparate Impact Policy (Service Equity Analysis)**

When conducting a service change equity analysis, the following thresholds will be used to determine when a service change would have a disparate impact on minority populations:

### **1. Route-Level Service Reduction or Elimination**

- Service Level and Service Area Reduction:



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- If the percentage of minority passengers<sup>2</sup> on an affected route is greater than the transit system's minority ridership (within the appropriate dataset's margin of error) by transit classification (local, express, neighborhood circulators, and rural bus).<sup>3</sup>

## 2. Route-Level Expansion or Addition of a New Route

- Service Level Expansion or Service Area Expansion (includes addition of new routes):
  - If a service level expansion or service area expansion is considered that coincides with a reduction in transit service on the same route or other routes, and the route(s) considered for service expansion predominantly serve non-minority and/or non-low-income geographic areas while the route(s) considered for reduction predominantly serve minority and/or low-income geographic areas, then a disproportionate burden may be determined. The determination of a disproportionate burden will be based on meeting both of the following criteria:
    - If the percentage of minority passengers<sup>2</sup> on an affected route considered for service expansion is less than the transit system's minority ridership percentage (within the appropriate dataset's margin of error) by transit classification (local, express, neighborhood circulators, and rural bus),<sup>3</sup> **AND**
    - If the percentage of minority passengers<sup>2</sup> on an affected route considered for service reduction is greater than the transit system's minority ridership percentage (within the appropriate dataset's margin of error) by transit classification (local, express, neighborhood circulators, and rural bus).<sup>3</sup>

### C. Low-Income Disproportionate Burden Policy (Service Equity Analysis)

When conducting a service change equity analysis, the following thresholds will be used to determine when a service change would have a disproportionate burden on low-income populations:

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<sup>2</sup> The determination of the transit system and an affected route's minority and/or low-income population will be derived from the most recently completed, statistically valid regional on-board origin and destination survey.

<sup>3</sup> Local routes include local fixed-route bus, light rail, LINK bus, local limited stop bus. Express routes include express bus and RAPID bus. Circulator routes will be evaluated similarly to local routes for fare changes and major services changes, but will be considered separately from local and express services when considered in the context of a region- or system-wide Title VI analysis. Circulator bus services are provided by the municipalities they serve and not the regional transit agency.

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## 1. Route-Level Service Reduction or Elimination

- If the percentage of low-income passengers<sup>2</sup> on an affected route is greater than the transit system's low-income ridership (within the appropriate dataset's margin of error) by transit classification (local, express, neighborhood circulators, and rural bus).<sup>3</sup>

## 2. Route-Level Expansion or Addition of a New Route

- Service Level Expansion or Service Area Expansion (includes addition of new routes):
  - If a service level expansion or service area expansion is considered that coincides with a reduction in transit service on the same route or other routes, and the route(s) considered for service expansion predominantly serve non-minority and/or non-low-income geographic areas while the route(s) considered for reduction predominantly serve minority and/or low-income geographic areas, then a disproportionate burden may be determined. The determination of a disproportionate burden will be based on meeting both of the following criteria:
    - If the percentage of low-income passengers<sup>2</sup> on an affected route considered for service expansion is less than the transit system's low-income ridership percentage (within the appropriate dataset's margin of error) by transit classification (local, express, neighborhood circulators, and rural bus),<sup>3</sup> **AND**
    - If the percentage of low-income passengers<sup>2</sup> on an affected route considered for service reduction is greater than the transit system's low-income ridership percentage (within the appropriate dataset's margin of error) by transit classification (local, express, neighborhood circulators, and rural bus).<sup>3</sup>



## Equity Analysis Data Sources

Category	Action	Sub Action	Evaluation Method
Fare	Adjustment	N/A	O/D <sup>a</sup> profile data of affected fare category and/or Census Data
Service Span	Reduction	N/A	O/D <sup>a</sup> profile data of affected route
	Expansion	N/A	
Service Headway	Reduction	N/A	O/D <sup>a</sup> profile data of affected route
	Expansion	N/A	
Route Length	Reduction	N/A	O/D <sup>a</sup> Data
	Expansion	N/A	Census Data
Route Alignment	Reduced Alignment	N/A	O/D <sup>a</sup> Data
	Expanded Alignment	N/A	Census Data
	Modified Alignment	Eliminated Segment(s)	
Segment(s) to New Areas			Census Data
New Route	New Route	N/A	Census Data

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

## Exemptions

The major service change thresholds exclude any changes to service that are caused by the following:

- Discontinuance of Temporary or Demonstration Services – The discontinuance of a temporary transit service or demonstration service that has been in effect for less than 180 days.
- Headway Adjustments – Headways for transit routes may be adjusted up to 5 minutes during the peak hour periods, and 15 minutes during non-peak hour periods.
- New Transit Service “Break-In” Period – An adjustment to service frequencies and/or span of service for new transit routes that have been in revenue service for less than 180 days.



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- Other Service Providers or Agencies – Actions of other service providers or public agencies providing/administering transit services that are not the responsibility of Valley Metro.
  - Natural or Catastrophic Disasters – Forces of nature such as earthquakes, wildfires, or other natural disasters, or human-caused catastrophic disasters that may force the suspension of scheduled transit service for public safety or technical reasons.
  - Auxiliary Transportation Infrastructure Failures – Failures of auxiliary transportation infrastructure such as vehicular bridges, highway bridge overpasses, tunnels, or elevated highways that force the suspension transit service.
  - Overlapping Services – A reduction in revenue miles on one line that is offset by an increase in revenue miles on the overlapping section of an alternative transit route (an overlapping section is where two or more bus routes or rail lines share the same alignment, stops, or stations for a short distance).
  - Seasonal Service and Special Events – Changes to bus service levels on routes which occur because of seasonal ridership changes and event activities served by dedicated temporary bus routes or increased service frequencies.
  - Temporary Route Detours – A short-term change to a route caused by road construction, routine road maintenance, road closures, emergency road conditions, fiscal crisis, civil demonstrations, or any uncontrollable circumstance.

### **Public Participatory Procedures**

For all proposed major service changes, City of Phoenix and/or Valley Metro will hold at least one public hearing, with a minimum of two public notices prior to the hearing in order to receive public comments on the potential service changes. The first meeting notice will occur at least 30 days prior to the scheduled hearing date, with the second notice being made at least 10 days prior to the scheduled hearing date. Public materials will be produced in English and Spanish (the metropolitan region's two primary languages), or in other languages upon request, in order to ensure Limited English Proficient (LEP) populations within the transit service area are informed of the proposed service changes and can participate in community discussions. Valley Metro and/or the City of Phoenix will conduct a service equity analysis for the Valley Metro Board of



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Directors, the City of Phoenix City Council, and the public's consideration prior to any public hearings associated with the proposed service changes.

## **Definitions**

Designated Recipient – The City of Phoenix is the designated recipient for federal funds contributing to transit system capital programs and operations in the greater Phoenix metropolitan region.

Disparate Impact – A facially neutral policy or practice that has a disproportionately excluding or adverse effect on the minority riders or population of the service area.

Disparate Treatment – An action that results in a circumstance in which minority riders or populations are treated differently than others because of their race, color, national origin and/or income status.

Disproportionate Impact – A facially neutral policy or practice that has a disproportionately excluding or adverse effect on the low-income riders or population of the service area.

Express Transit Service – Includes Valley Metro designated express bus and RAPID bus services.

High-Capacity Transit (HCT) – A transit facility or service that operates at a consistent, high frequency of service.

Local Transit Service – Includes Light Rail Transit (LRT), and local fixed-route bus, local limited stop bus, LINK bus routes, and circulator/shuttle bus services.

Low-income Populations & Areas – Low-income populations are those persons with an income of 80 percent or less of the national per capita income. “Low-income Areas” are residential land use areas within census tracts where the average per capita income is 80 percent or less of the national per capita income.

Minority Populations & Areas – Minority populations include those persons who self-identify themselves as being one or more of the following ethnic groups: American Indian and Alaska Native, Asian, Black or African American, Hispanic or Latino, Native Hawaiian and Other Pacific Islander, as defined in the FTA Title VI Circular. “Minority Areas” are residential land use areas within Census tracts where the percentage of minority persons is higher than the Valley Metro service area average.

Route-Level – Refers to the geographic level of analysis at the route alignment level by which the performance of a transit route is measured for equity.



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Route-Service Area – A three-quarter mile radial buffer on either side of a transit route’s alignment. A three-quarter mile radial buffer is used to ensure compliance with the American’s with Disabilities Act guidelines.

Service Level – Refers to the span of service (hours of operation), days of operation, trips, and headways (service frequencies) for a transit route or the regional transit system.

Service Area – According to 49 CFR 604.3, geographic service area means “the entire area in which a recipient is authorized to provide public transportation service under appropriate local, state, and Federal law.”

Service Span – The span of hours over which service is operated (e.g., 6 a.m. to 10 p.m.). The service span may vary by weekday, Saturday, or Sunday.

Sub-recipient – Valley Metro is a designated sub-recipient of federal funding for capital projects and service operations. Funding is passed onto Valley Metro from the designated recipient, the City of Phoenix.

System-wide – Refers to the geographic level of analysis by which the performance of the entire transit system is measured for equity.

Transit System – A coordinated urban network of scheduled public passenger modes including fixed-route local and express buses, light rail transit, bus rapid transit, and circulator bus services that provide mobility for people from one place to another.