

**Department of Transportation Services (DTS)
Public Transit Division Title VI Program
Service Equity Analysis Report
Routes: 72 Schofield/Wahiawa/Whitmore
98A Kunia/Wahiawa/Mililani/Waikiki Express**

Introduction

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. This analysis was conducted in compliance with Federal Transit Administration (FTA) Circular 4702.1B, which requires any FTA recipient providing 50 or more fixed route vehicles in peak service located in an urbanized area and serving a population of 200,000 or greater to evaluate any major service change at the planning stage to determine whether those changes have a disparate impact on minority populations and disproportionate burden on low-income populations. This report is the service equity analysis of the changes to Routes 72 and 98A that are planned for implementation in December 2016.

Background

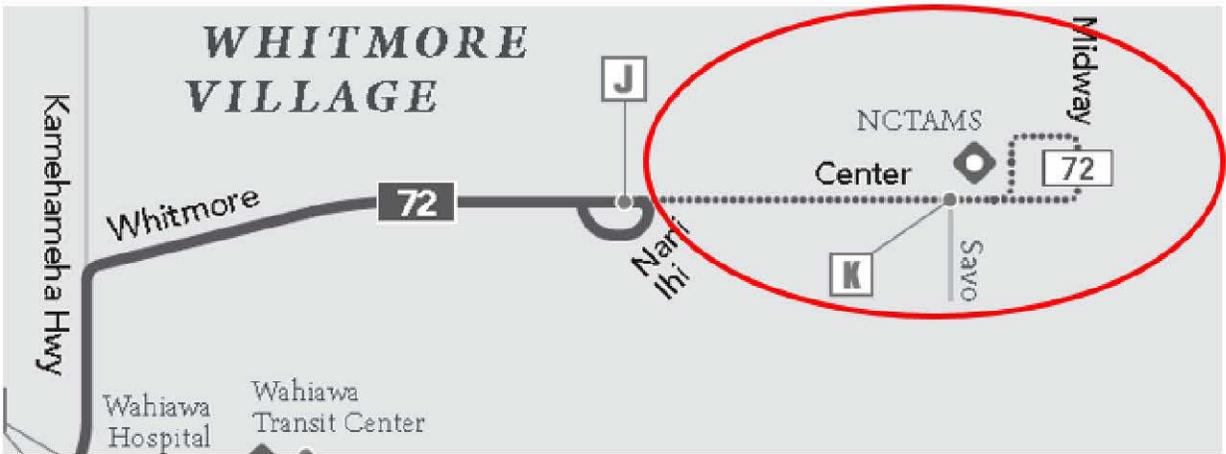
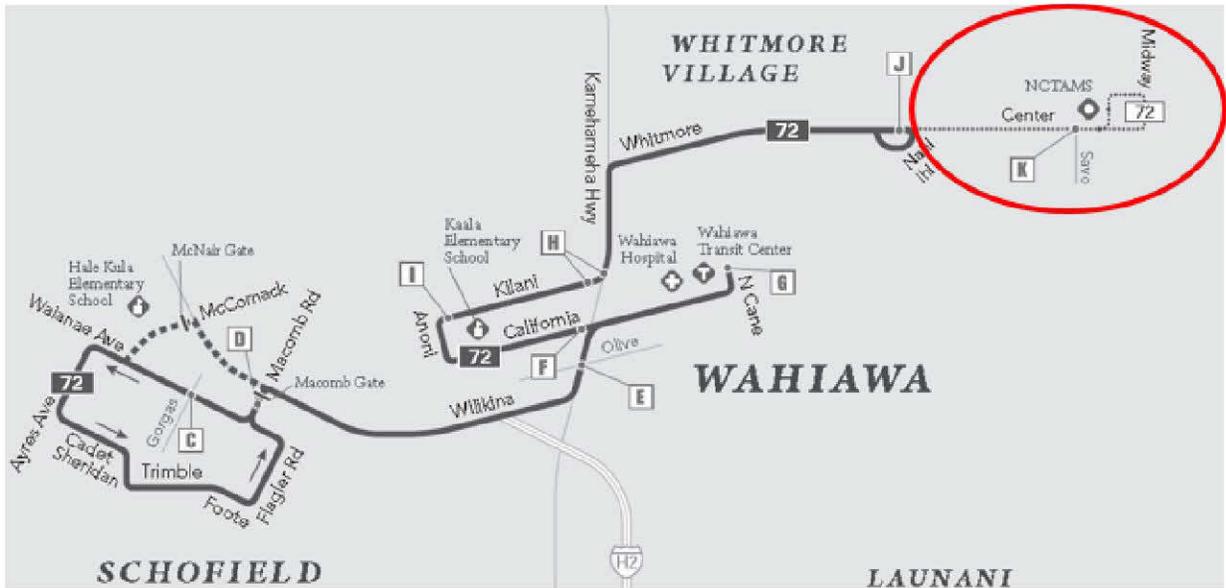
Route 72: Continued low ridership for the Naval Computer and Telecommunications Area Master Station Pacific (NCTAMS) segment is the basis for the proposed elimination of this route segment. It was initiated in the summer of 2015 when NCTAMS notified DTS of an upcoming construction project affecting entry through the main gate and the temporary discontinuance of Route 72 into NCTAMS. Although the construction project was cancelled during the rider notification period, DTS decided to initiate plans to permanently eliminate this segment of Route 72 since communication with the affected 2-3 riders had already been established and they were found to be occasional bus riders.

Historically, TheBus service for NCTAMS was eliminated in mid-2000 when construction precluded bus operations; ridership at that time was also very low, and service to NCTAMS was not restored when construction was completed. In 2006 limited service was restored at the request of then NCTAMS Commanding Officer on the promise of improved ridership due to increases in personnel and residents.

This has not been the case and based on actual usage of the current limited service into NCTAMS, the three trips at 6:14 AM, 7:29 AM, and 4:12 PM carry a combined daily average of two to three passengers.

The time and distance for the NCTAMS segment contributes to the operating overhead of the route, issues with scheduling, and on-time performance. In the absence of demand, and in the interest of operating efficiency, DTS plans to eliminate this unproductive route segment. As a secure military base subject to unpredictable security levels, bus service has been denied entry on several occasions. The value of the time and distance savings will improve schedule

reliability for the rest of the route. The segment proposed for elimination is circled in the route maps below.



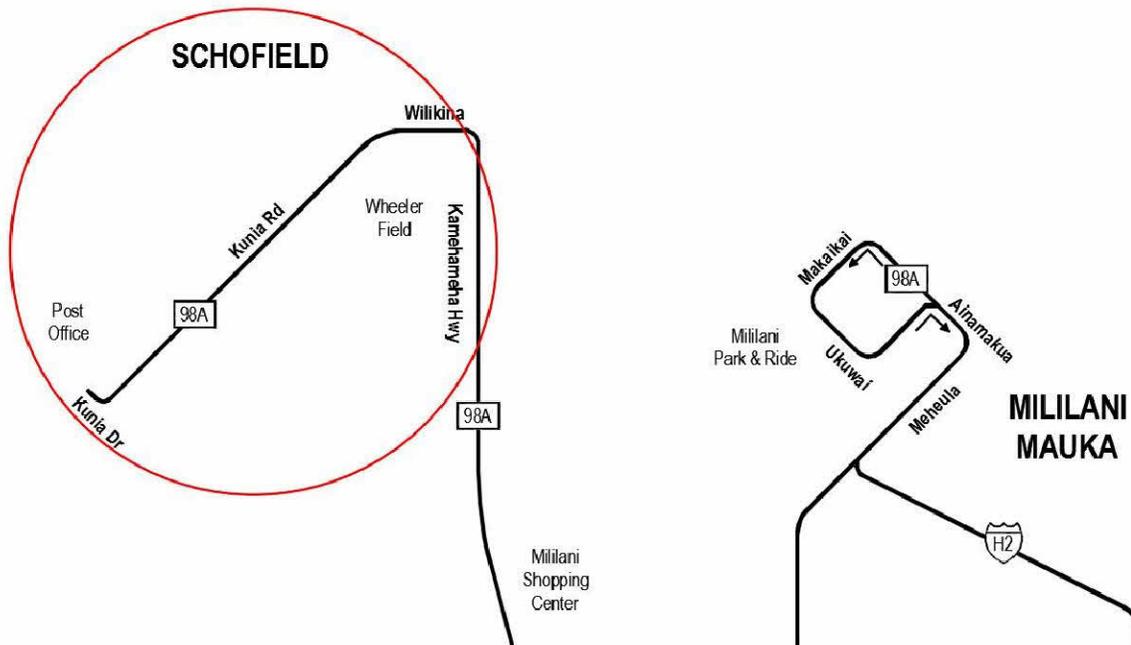
Route 98A: Continued low ridership for the Kunia Village segment between Kunia Village and the Wahiawa Park and Ride is the basis for the proposed elimination of this route segment.

Historically, Route 98A was implemented through the initiative and funding appropriation of the Honolulu City Council to assist Kunia Village plantation residents in accessing new jobs when Del Monte ceased its pineapple operations in 2007. Route 98A, provides express service between Kunia Village and Waikiki, and is an extended version of Route 98 that provides express service between Mililani and Downtown Honolulu. The only bus stops served in this eliminated segment are the Kunia Village stop and two stops along Wilikina Drive that are also served by other routes. According to ridership data, there is no passenger activity for Route 98A at the Wilikina Drive bus stops and the Kunia Village bus stop has one passenger

boarding in the morning and one passenger alighting in the afternoon. As a peak period express service, Route 98A provides two early morning trips (4:50 am, 5:20 am) and two afternoon trips (4 pm, 4:40 pm) between Kunia Village and Waikiki.

While initial usage was adequate, over time Kunia Village ridership has declined greatly with a combined daily average of two passengers for the two morning and two afternoon trips (public outreach found that it was the same person riding the AM & PM trips). Ridership for the remainder of the route remains good. In addition, the Kunia Village turn-around area is a shared use parking area with limited space, and on several occasions, bus operations were impeded by parked vehicles.

The time and distance for the Kunia Village segment contributes to the operating overhead of the route. As a plantation housing complex, Kunia Village is located approximately 2.5 miles from Wilikina Drive, 3 miles from downtown Wahiawa, and 4 miles from the Wahiawa Park and Ride at the National Guard Armory. In the absence of demand, and in the interest of operating efficiency, DTS plans to eliminate this unproductive route segment. The rest of the route between the Wahiawa Park-n-Ride and Waikiki will remain intact. The segment proposed for elimination is circled in the route map below.



Public Engagement Process

Routes 72 and 98A:

Summer 2015: NCTAMS administration and 3 riders are informed of the proposal to permanently eliminate Route 72 from NCTAMS and DTS maintains communication with them to address their transportation concerns. Since Route 98A is in the same region as Route 72 and the segments proposed for elimination are comparable, DTS decides to include the Kunia Village segment.

October 2015: DTS officially informs NCTAMS of the Route 72 elimination and continues to work with the affected riders. Route 98A survey notices informing riders of the proposed elimination of the Kunia Village segment and to contact DTS were posted at affected bus stops, with only one rider contacting DTS.

July 2016: DTS presentation at the Wahiawa/Whitmore Village Neighborhood Board No. 26 for Routes 72 and 98A. Affected riders were informed to attend. Councilmember notified of DTS attendance at the neighborhood board meeting.

October to

November 2016: Notification through DTS and TheBus websites, flyers to riders, and signage at affected bus stops. The 3 Route 72 riders and 1 Route 98A rider were contacted personally via email and phone calls. All 4 riders were able to arrange alternate transportation.

December 2016: Route 72 NCTAMS segment and Route 98A Kunia Village segment are scheduled for elimination.

Title VI Policies and Definitions

DTS' Title VI Program contains the policies and procedures to determine if service changes are considered "major" and to evaluate the impact of major service changes to minority and low income populations.

Major Service Change Policy: Eliminating a route segment is defined as major service change that requires DTS to perform a service equity analysis during the planning phase prior to implementation.

Disparate Impact Policy: DTS determines the occurrence of a disparate impact when adverse effects of a major service change disproportionately affects minority populations by more than 10% based on the difference between the proportion of the total minority and non-minority populations in the total service area and the proportion of the affected minority and non-minority populations within the affected service area, a ½ mile radius of the route.

Disproportionate Burden Policy: DTS determines the occurrence of a disproportionate burden when adverse effects of a major service change disproportionately affects low income populations by more than 10% based on the difference between the proportion of the total low income and non-low income populations in the total service area and the proportion of the

affected low income and non-low income populations within the affected service area, a ½ mile radius of the route.

Analysis Framework

Methodology: Population data using the most current Census block groups were used to determine:

- Minority and low income proportion of the total service area population in the Census block groups served by Route 72 or Route 98A.
- Minority and low income proportion of the affected service area population located within a ½ mile radius of Route 72 or Route 98A.

The differences between the minority proportions and low income proportions were calculated to determine disparate impact on minority populations and disproportionate burden on low income populations. Differences exceeding 10% indicate that the major service change affected minority populations disparately and low income populations disproportionately.

Data Tables:

Table 1: Census Block Group Minority Populations

Route	Total Service Area			Affected Service Area			% Difference Total & Affected Service Areas	Exceed 10%
	Total Population	Minority Population	% Minority	Affected Population	Minority Population	% Minority		
72	33,666	25,899	77%	14,916	11,046	74%	3%	No
98A	145,961	34,045	23%	70,364	15,187	22%	1%	No

Table 2: Census Block Group Low Income Populations

Route	Total Service Area			Affected Service Area			% Difference Total & Affected Service Areas	Exceed 10%
	Total Population	Low Income Population	% Low Income	Affected Population	Low Income Population	% Low Income		
72	33,666	6,054	18%	14,916	3,456	23%	5%	No
98A	145,961	29,484	20%	70,364	19,986	28%	8%	No

Required Maps: (see appendix)

Affected census block groups with minority and low income area block groups.

Assessing Impacts

Disparate Impact: As shown in Table 1 above, the effects of the service change to Routes 72 and 98A do not exceed the disparate impact policy threshold of 10%. For both routes, the service change will impact the affected minority population less than the minority population of the total service area. Route 72 is 3% less and Route 98A is 1%.

Disproportionate Burden: As shown in Table 2 above, while the effects of the service change to Routes 72 and 98A do not exceed the disproportionate burden policy threshold of

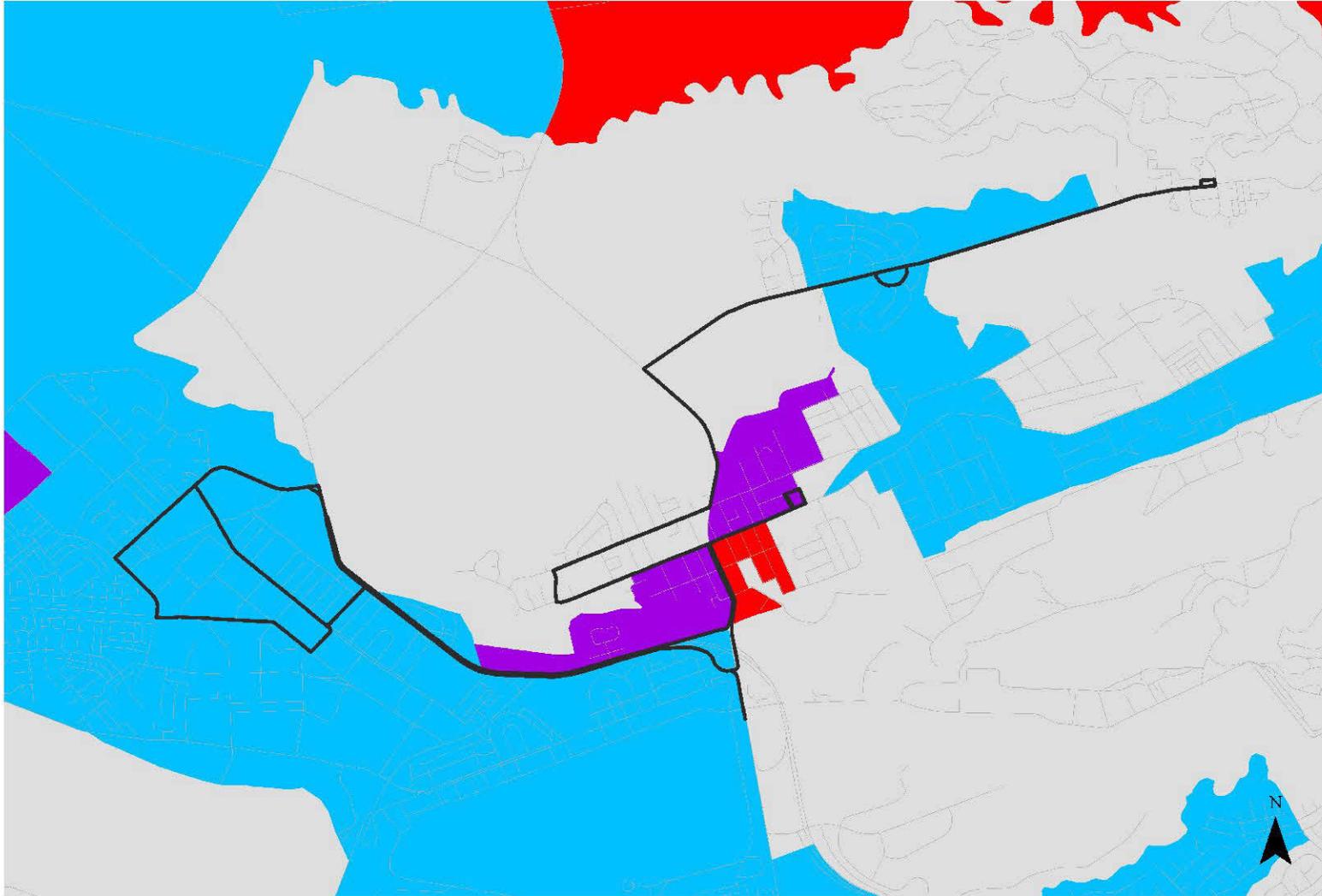
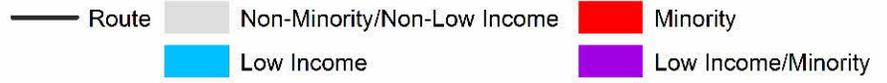
10%, the affected low income population for both routes will be impacted more than the low income population of the total service area. Route 72 is 5% more and 98A is 8%.

Service Equity Analysis: Based on DTS Major Service & Fare Change Policy and Disparate Impact & Disproportionate Burden Policies, there is no disparate impact to the affected minority population and no disproportionate burden to the affected low income population from the proposed service changes to Routes 72 and 98A. The Route 72 segment proposed for elimination serves a secure military installation with 2-3 occasional riders and is located in a Census block group identified as predominantly non-minority and non-low income. The Route 98A segment proposed for elimination serves a housing complex for workers of a former pineapple plantation with only 1 rider and is located in a relatively uninhabited area, several miles away from the urban core of Wahiawa town. Through public outreach efforts, communication was maintained with all affected riders who were able to find other transportation options

APPENDIX

MAPS

Route 72 - Census Block Groups



Route 98A - Census Block Groups

