

Pierce Transit

Title VI Fare Equity Analysis

Pursuant to FTA Circular 4702.1B

Reducing the fare price of the Pierce Transit All Day Pass Reduced Senior/Disabled,
Pierce Transit All Day Pass – Lift, to be at parity or below the ORCA Regional All-Day
Pass

January 2025

TABLE OF CONTENTS

| | |
|---|----|
| Introduction | 3 |
| Background..... | 3 |
| Pierce Transit Disparate Impact Policy | 5 |
| Collection of Demographic Data | 7 |
| Table: 2024 Title VI Population Distribution: Public Transportation Benefit Area (PTBA)..... | 7 |
| Figure 1. Minority Populations..... | 8 |
| Figure 2. Low-Income Populations | 9 |
| Table 1. Minority, Poverty, LEP Data for Pierce Transit PTBA | 11 |
| Table 2. Poverty Thresholds for 2023 by Size of Family and Number of Related Children Under 18 Years..... | 11 |
| Table 3. White/BIPOC of Pierce Transit Current Customers taken from the 2022 Pierce Transit Customer Satisfaction Survey | 12 |
| Table 4. Income Levels of Pierce Transit Customers taken from the 2022 Pierce Transit Customer Satisfaction Survey | 12 |
| Table 5. Fare type impact used by Minority and Low-income riders of Pierce Transit Customers taken from the 2022 Pierce Transit Customer Satisfaction Survey..... | 13 |
| Disparate Impact Analysis | 13 |
| Disproportionate Burden Analysis | 13 |

Introduction

Pierce Transit is a Public Transportation Benefit Area Authority incorporated under Ch. 36.57A RCW in 1979. The Agency is a separate local government and is governed by a ten-member Board of Commissioners. The Board is made up of elected officials representing Pierce County, Tacoma, Lakewood, Puyallup, University Place and the smaller towns and cities of our service area. The governance structure allows for a tenth, non-voting union representative.

Pierce Transit covers 292 square miles of Pierce County and roughly 70 percent of the county population. Serving Washington's second largest county, Pierce Transit provides four types of service: Fixed Route, SHUTTLE paratransit, Rideshare (formerly known as Vanpool) and Runner on-demand Microtransit.

This document has been prepared in accordance with FTA Circular 4702.1B, which requires that recipients of financial assistance from the Federal Transit Administration document compliance with Title VI of the Civil Rights Act of 1964. Title VI protects from discrimination, based on race, color, or national origin, and requires that federal recipients provide meaningful access to services, programs and activities for individuals who are Limited English Proficient (LEP). This document addresses the general requirements for all recipients – Section II – as well as requirements for transit agencies serving populations of 200,000 or greater in Section III.

Background

Pierce Transit is a member of the ORCA Joint Board which serves as the governing, policy-setting body that oversees all activities related to the design, implementation, operation and maintenance of the ORCA System. The ORCA Joint Board members have authorized a special promotional offer that will help riders save more on their daily ride or commute. Starting August 30, 2024, ORCA cardholders can take advantage of a new promotional day-pass fare, offering significant savings for the next six months. For a limited time, the regional Adult ORCA Day-pass will be reduced from \$8.00 to \$6.00, while the regional reduced-fare day-pass (Seniors, ORCA LIFT for customers with lower incomes, and customers with disabilities) will drop from \$4.00 to \$2.00.

To achieve parity with the ORCA regional reduced day-pass for the same six-month period, Pierce Transit's CEO also authorized temporarily reducing its Pierce Transit All-Day-Pass Reduced Senior/Disabled, and Pierce Transit All-Day-Pass – LIFT, to \$2.00. The \$2.00 promotional Pierce Transit pass fare is available wherever people buy their passes: on an ORCA card, on Transit app or Token Transit app, on board Pierce Transit buses, or through the Human Services Agency pass program. It is expected that these fare reductions will become permanent when the promotional period ends, and that permanent reduction necessitates the need for a Title VI Fare Equity Analysis.

A public hearing will be held December 9, 2024, during the Board of Commissioners meeting, to allow the public to comment on said proposed permanent fare reduction. The Community Transportation Advisory Group (CTAG) voiced support for said permanent fare reduction at their October meeting.

The fare equity analysis analyzes whether the proposed reduction in the above-described fare categories will have a disparate impact on Pierce Transit's minority riders and/or a disproportional burden on the agencies low-income riders.

 **POLICY**

PIERCE TRANSIT DISPARATE IMPACT POLICY

The requirement for this policy comes from Federal Transit Administration (FTA) Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients" which became effective October 1, 2012. The Circular requires any FTA recipient that operates 50 or more fixed route vehicles in peak service and serving a population of 200,000 or greater to evaluate any fare change and any major service change at the planning and programming stages to determine whether those changes have a discriminatory impact.

The purpose of this policy is to establish a threshold which identifies when adverse effects of a major service change or any fare change are borne disproportionately by minority populations.

A disparate impact occurs when the minority population adversely affected by a fare or service change is ten percent more than the average minority population of Pierce Transit's service area.

Disparate impacts on routes with either span of service changes and/or frequency changes will be determined by analyzing all routes with such changes together. Disparate impacts on routes with segment elimination, re-routing, or route elimination will be determined on a route by route basis.

If Pierce Transit finds a potential disparate impact, the agency will take steps to avoid, minimize or mitigate impacts then reanalyze the modified service plan to determine whether the impacts were removed. If Pierce Transit chooses not to alter the proposed changes, the agency may implement the service or fare change if there is substantial legitimate justification for the change AND the agency can show that there are no alternatives that would have less of an impact on the minority population and would still accomplish the agency's legitimate program goals.

Adopted by the Pierce Transit Board of Commissioners February 11, 2013



POLICY

PIERCE TRANSIT DISPROPORTIONATE BURDEN POLICY

The requirement for this policy comes from Federal Transit Administration (FTA) Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients" which became effective October 1, 2012. The Circular requires any FTA recipient that operates 50 or more fixed route vehicles in peak service and serving a population of 200,000 or greater to evaluate any fare change and any major service change at the planning and programming stages to determine whether those changes have a discriminatory impact.

The purpose of this policy is to establish a threshold which identifies when the adverse effects of a major service change or any fare change are borne disproportionately by low-income populations.

A disproportionate burden occurs when the low-income population adversely affected by a fare or service change is five percent more than the average low-income population of Pierce Transit's service area.

Disproportionate burden on routes with either span of service changes and/or frequency changes will be determined by analyzing all routes with such changes together. Disproportionate burden on routes with segment elimination, re-routing, or route elimination will be determined on a route by route basis.

If Pierce Transit finds a potential disproportionate burden, the agency will take steps to avoid, minimize or mitigate impacts then reanalyze the modified service plan to determine whether the impacts were removed. If Pierce Transit chooses not to alter the proposed changes, the agency may implement the service or fare change if there is substantial legitimate justification for the change AND the agency can show that there are no alternatives that would have less of an impact on low-income population and would still accomplish the agency's legitimate program goals.

Adopted by the Pierce Transit Board of Commissioners February 11, 2013

Collection of Demographic Data

The following section is a demographic analysis of the population within Pierce Transit’s Public Transportation Benefit Area (PTBA) or service area within Pierce County, Washington. To monitor the low-income and minority demographics of the area, the agency uses the most current data available from the US Census Bureau in conjunction with the Pierce Transit Customer Satisfaction Survey, which is usually conducted every three years.

According to the US Census Bureau’s American Community Survey (ACS), the difference between the Public Transportation Benefit Area (PTBA) population and Pierce County population is estimated to be 304,763 persons. The 2018-2022 5-Year dataset estimates the county population at 918,993 with 614,230 within the PTBA boundary. The county-wide and PTBA populations are derived from the 2018-2022 American Community Survey data used in the demographic analysis.

Table: 2024 Title VI Population Distribution:

Public Transportation Benefit Area (PTBA)

| 2024 Title VI Population Distribution: Public Transportation Benefit Area (PTBA) | | | |
|--|---------|---------|------------------|
| | Male | Female | Total Population |
| Low-Income (LI) Block Groups | 44,420 | 45,682 | 90,102 (14.7%) |
| High-Minority (HM) Block Groups | 72,300 | 68,895 | 141,195 (22.9%) |
| LI+HM Block Groups | 80,257 | 76,813 | 157,070 (25.6%) |
| Non-LI/HM Block Groups | 109,460 | 116,403 | 225,863 (36.8%) |
| Total PTBA Population | 306,437 | 307,793 | 614,230 (100%) |
| Source: 2018-2022 ACS 5-Year Data Set: US Census Bureau | | | |

Because the boundaries of block groups frequently do not align with the PTBA, block groups which shared at least some population-bearing portion with the PTBA were included in the PTBA population estimate. The exact degree of fringe oversampling is unknown but expected to be relatively small.

The following maps show all Pierce Transit routes overlaid on maps of the Minority Census Block Groups (Figure 1), and Low-Income Census Block Groups (Figure 2).

Figure 1. Minority Populations

Figure 1 shows the concentrations of minority populations throughout the PTBA by showing 2018-2022 ACS block groups with minority populations higher than the overall PTBA average minority population of 41.3 percent.

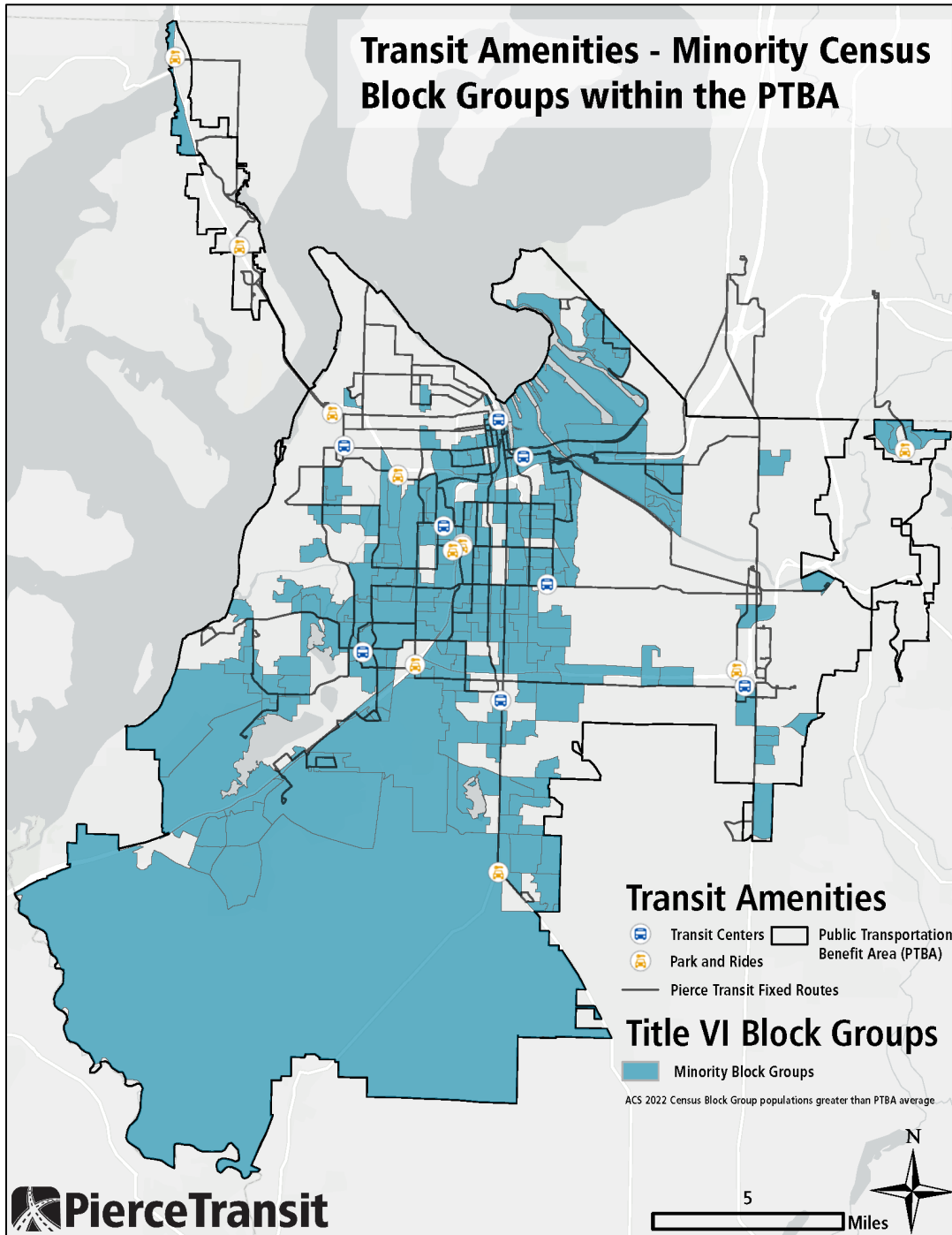
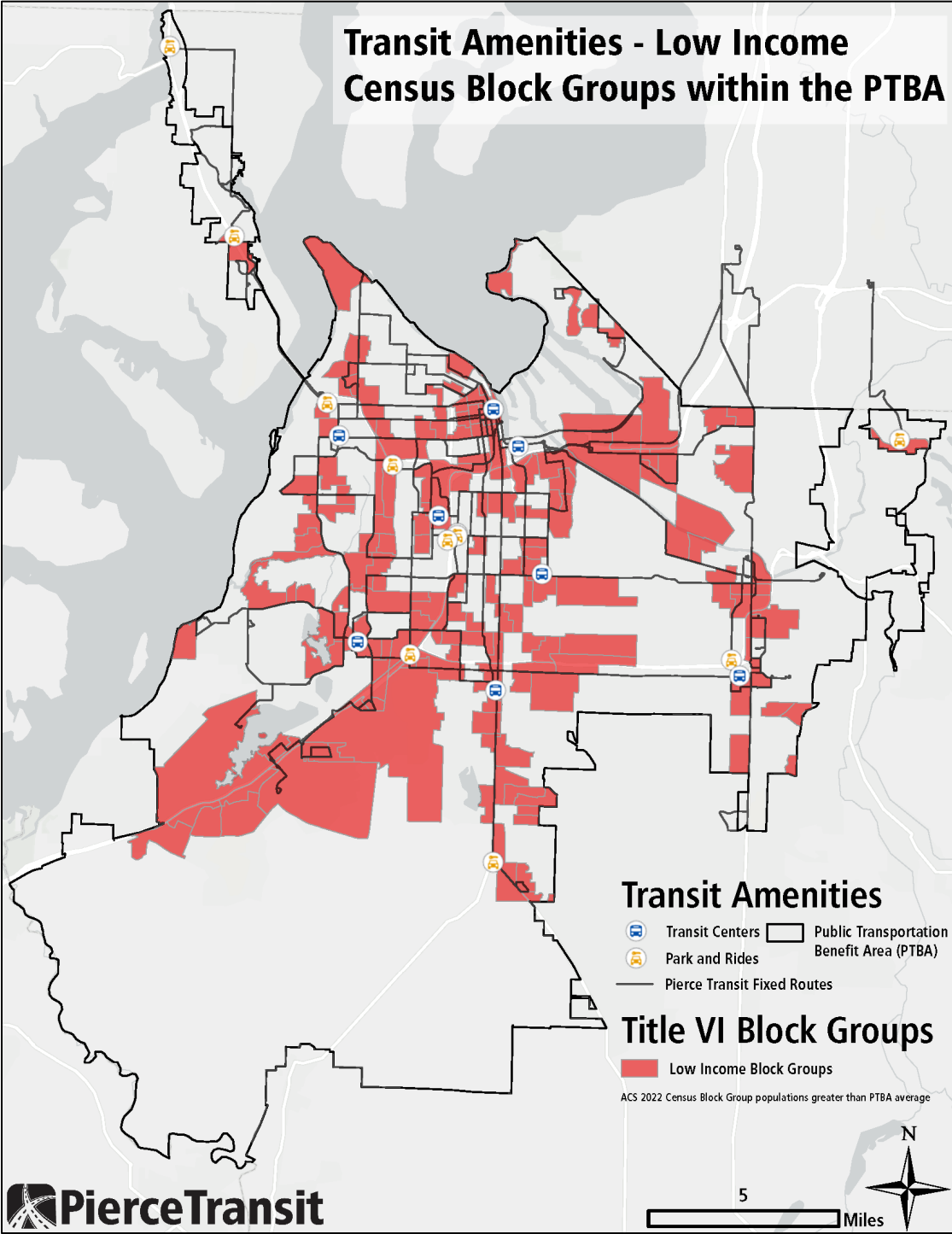


Figure 2. Low-Income Populations

Figure 2 shows the concentrations of low-income populations throughout the PTBA by showing 2018-2022 ACS block groups with low-income populations higher than the overall PTBA average low-income population of 9.3 percent.



Low-Income is defined according to 2018-2022 5-Year American Community Survey Table B17017, "Poverty Status in the Past 12 Months by Household Type by Age of Householder." Using block groups within the Pierce County PTBA, households under the field "Income in the Past 12 Months below Poverty Level" were determined to represent 9.3 percent of all households. Therefore, block groups above this threshold of 9.3 percent in poverty were designated as "Low-Income."

Table 1 shows the data and sources for the ACS data used.

Table 1. Minority, Poverty, LEP Data for Pierce Transit PTBA

| U.S. Census Bureau, 2018-2022 5-Year American Community Survey | | | | | | | | | |
|---|-----------------|--------------------------|----------|------------|-------------------|------------------|--------------------|----------------------------|-----------|
| | Minority B03002 | | | | Low-Income B17017 | | | LEP C16002 | |
| | Total Pop | Not Hispanic White Alone | Minority | % Minority | House Holds (HH) | HH Below Poverty | % HH Below Poverty | Limited English Households | % LEP HHs |
| Total | 614,230 | 360,398 | 253,832 | 36.9% | 235,479 | 21,997 | 9.3% | 7,970 | 3.4% |
| Geography | Block Group | | | | Block Group | | | Block Group | |
| *A "limited English-speaking household" is one in which no member 5 years old and over (1) speaks only English or (2) speaks a non-English language and speaks English "very well." In other words, all members 5 years old and over have at least some difficulties with English. English-only households cannot belong to this group. | | | | | | | | | |

The federal definition of poverty level varies according to the number and age of persons living within a household but does not vary according to geography. It is updated annually by the Consumer Price Index (CPI).

Table 2 represents the Federal Poverty Thresholds for 2023.

Table 2. Poverty Thresholds for 2023 by Size of Family and Number of Related Children Under 18 Years

| Size of family unit | Related children under 18 years | | | | | | | | |
|------------------------------------|---------------------------------|--------|--------|--------|--------|--------|--------|--------|---------------|
| | None | One | Two | Three | Four | Five | Six | Seven | Eight or more |
| One person (unrelated individual): | | | | | | | | | |
| Under 65 years..... | 15,852 | | | | | | | | |
| 65 years and over..... | 14,614 | | | | | | | | |
| Two people: | | | | | | | | | |
| Householder under 65 years..... | 20,404 | 21,002 | | | | | | | |
| Householder 65 years and over..... | 18,418 | 20,923 | | | | | | | |
| Three people..... | 23,834 | 24,526 | 24,549 | | | | | | |
| Four people..... | 31,428 | 31,942 | 30,900 | 31,008 | | | | | |
| Five people..... | 37,901 | 38,452 | 37,275 | 36,363 | 35,807 | | | | |
| Six people..... | 43,593 | 43,766 | 42,864 | 41,999 | 40,714 | 39,952 | | | |
| Seven people..... | 50,159 | 50,472 | 49,393 | 48,640 | 47,238 | 45,602 | 43,808 | | |
| Eight people..... | 56,099 | 56,594 | 55,575 | 54,683 | 53,416 | 51,809 | 50,136 | 49,710 | |
| Nine people or more..... | 67,483 | 67,810 | 66,908 | 66,151 | 64,908 | 63,198 | 61,651 | 61,268 | 58,907 |

Source: U.S. Census Bureau, 2024.

Pierce Transit also uses statistically representative survey research to track customer satisfaction and demographics, typically every three years. The most recent survey was conducted between September 12 – October 26, 2022.

The following tables capture customer demographic information (Black, Indigenous, and People of Color [BIPOC] and White) in relation to specific questions.

Table 3 shows the ethnicity breakdown of Pierce Transit’s customers who responded to the 2022 Customer survey. Non-white respondents equal 32%.

Table 3. White/BIPOC of Pierce Transit Current Customers taken from the 2022 Pierce Transit Customer Satisfaction Survey

| | Percentage of Respondents | Percentage of Respondents (not including "No Response") |
|-------------|---------------------------|---|
| White | 61% | 67.78% |
| BIPOC | 29% | 32.22% |
| No Response | 10% | - |

Table 4 shows the income levels for Pierce Transit’s customers who responded to the 2022 Customer Survey. Roughly 49% of respondents have household annual incomes below \$30,000.

Table 4. Income Levels of Pierce Transit Customers taken from the 2022 Pierce Transit Customer Satisfaction Survey

| | Percentage of Respondents | Percentage of Respondents (not including "No Response") |
|-------------|---------------------------|---|
| <30 | 36% | 48.65% |
| 30-75 | 19% | 25.68% |
| 75+ | 19% | 25.68% |
| No Response | 26% | - |

Table 5 shows the impact to Pierce Transit’s minority customers is greater than 10% for the All-Day Pass and the ORCA LIFT.

Table 5. Fare type impact used by Minority and Low-income riders of Pierce Transit Customers taken from the 2022 Pierce Transit Customer Satisfaction Survey

| Fare Type | Observations | Minority Riders | Difference from PTBA Average | Impacted by Change? (>=10%) | Low Income Riders | Difference from PTBA Average | Impacted by Change? (>=5%) |
|--------------------|--------------|-----------------|------------------------------|-----------------------------|-------------------|------------------------------|----------------------------|
| All Day | 12 | 50% | 18% | Yes | 44.40% | -4.25% | No |
| ORCA LIFT | 14 | 40% | 8% | No | 66.60% | 17.95% | Yes |
| Senior or Disabled | 196 | 36% | 3.368% | No | 51.04% | 2.39% | No |

*Data from 2022 Customer Survey Cross Tab B

Disparate Impact Analysis

Pierce Transit’s policy states that a disparate impact occurs when the minority population is adversely affected by a fare or service change that is 10% more than the average minority population of the Pierce Transit’s service area. In the case of a fare change, the intent of the policy is to compare the difference between the percentage of all riders vs. the percentage of minority riders using that fare type and to look at whether minority riders are more impacted by the change than all riders.

Table 5 provides this data for fare payment categories from the Pierce Transit 2022 Customer Survey in the light green column entitled “Impacted by Change? (>10%).” You will see All-Day pass fare users that are minority receive a greater benefit to the fare reduction than all riders.

Disproportionate Burden Analysis

Pierce Transit’s policy states that a disparate impact occurs when the low-income population is adversely affected by a fare or service change that is 5% more than the average low-income population of Pierce Transit’s service area. In the case of a fare change, this means that we must examine the difference between the percentage of all riders vs. the percentage of low-income riders using that fare type and look at whether low-income riders are more impacted by the change than all riders.

Table 4 provides income data from the Pierce Transit 2022 Customer Survey. In the light peach column entitled “Income Breakdown” the percentage is 36%, well exceeding the 5% threshold. This indicated low-income riders will receive a greater benefit to the reduced fare than all riders.

In conclusion, the reductions in the fare price of an All-Day pass has a more significant beneficial impact on minority and low-income riders compared to the overall rider population.