CITY COUNCIL
CITY AND COUNTY OF HONOLULU
HONOLULU, HAWAII

No. 19-90

RESOLUTION

APPROVING THE DEPARTMENT OF TRANSPORTATION SERVICES 2019 PUBLIC TRANSIT TITLE VI PROGRAM PURSUANT TO THE FEDERAL TRANSIT ADMINISTRATION TITLE VI CIRCULAR 4702.1.B REQUIREMENTS AND GUIDELINES.

WHEREAS, Title VI of the Civil Rights Act of 1964 (42 U.S.C. §2000d et seq) prohibits discrimination on the basis of race, color, or national origin for recipients of federal financial assistance; and

WHEREAS, the Department of Transportation Services (DTS), as a recipient of Federal Transit Administration (FTA) financial assistance for the public transit system, must prepare and submit to the FTA a Title VI Program that is compliant with FTA Circular 4702.1B Title VI Requirements and Guidelines for FTA Recipients (Circular); and

WHEREAS, DTS prepared the attached 2019 Public Transit Title VI Program in compliance with the requirements set forth in the Circular and reported that DTS provides public transit service in conformance with Title VI legislation that prohibits discrimination on the basis of race, color, or national origin; and

WHEREAS, the 2019 Public Transit Title VI Program must be approved by the City's governing entity, the Honolulu City Council, prior to submission to FTA pursuant to the Circular's Requirements and Guidelines for Fixed Route Transit Providers; now

BE IT RESOLVED by the Council of the City and County of Honolulu that the DTS 2019 Public Transit Title VI Program, attached hereto and which by reference is made a part hereof, be approved; and

BE IT FURTHER RESOLVED that the DTS Director may make minor or editing changes to the DTS 2019 Public Transit Title VI Program; attached hereto, provided that no substantial additions or deletions may be made; and

D-262(19)

765922 DTS-PTD (Reso)

TRANS

CITY COUNCIL
CITY AND COUNTY OF HONOLULU
HONOLULU, HAWAII

No. 19-90

RESOLUTION

BE IT FINALLY RESOLVED that a copy of this resolution be transmitted to the DTS Director at the Fasi Municipal Building, 650 South King Street, 3rd Floor, Honolulu, Hawaii 96813.

INTRODUCED BY:

(br)

DATE OF INTRODUCTION:

APR 16 2019

Honolulu, Hawaii

Councilmembers

2019
Public Transit Title VI Program
City and County of Honolulu
Department of Transportation Services
Public Transit Division

2019 Public Transit Title VI Program

Introduction

The City and County of Honolulu Department of Transportation Services (DTS) through its Public Transit Division (PTD) is responsible for providing fixed-route (TheBus) and complementary ADA paratransit (TheHandi-Van) service for the island of Oahu. TheBus and TheHandi-Van are operated and maintained by Oahu Transit Services, Inc. (OTS), a private, not for profit management firm under contract with DTS.

TheBus operates 104 routes serving the major regions on the island of Oahu: Windward (Kahuku to Makapuu), Leeward (Makaha to Waipahu), Central Oahu (North Shore to Mililani) and the primary urban corridor (Pearl City to East Honolulu). The 104 routes are categorized into five modes of service operating at various times throughout the week: Rapid Bus (limited stop), Trunk, Circulator, Peak Hour Express, and Community Access.

Title VI (TVI), codified at 42 U.S.C §2000d et seq., was enacted as part of the landmark Civil Rights Act of 1964 prohibiting discrimination against a broad range of protected classes, including race, color, and national origin in programs and activities receiving federal financial assistance. As a recipient of federal grant funds, DTS-PTD certifies to the Federal Transit Administration (FTA), upon execution of a master grant agreement and accompanying assurances and certifications, that public transit services are provided in compliance with Civil Rights legislation.

Recipients of FTA grants are required to prepare and submit a report every 3 years to document that public transit services are provided in a nondiscriminatory manner. The 2019 Public Transit TVI Program report is due to the FTA by June 1, 2019. The requirements for preparing this TVI Program report are outlined in Chapters 3 & 4, “FTA TVI Circular C 4702.1B (Circular)”. (Attachment 10)

Part I of this report addresses the Circular’s general requirements in Chapter 3 that are applicable to all FTA grantees. These requirements include: Program Contents, Public Notice, Complaint Procedures/Form, Investigations/Complaints/Lawsuits, Public Participation Plan/Process, Language Services for Limited English Proficient (LEP) Persons, Minority Representation on Planning/Advisory Boards, Subrecipient Assistance/Monitoring, Facility Site/Location Selection, and Approval by Governing Entity.

Part II of this report addresses the Circular’s Chapter 4 requirements that are applicable to fixed route transit providers who operate 50 or more fixed route vehicles in peak service and located in an urbanized area of 200k or more in population. The requirements include: Program Contents, System-Wide Service Standards/Policies, Demographic Data, Transit Service Monitoring, and Evaluation of Service/Fare Changes.

The transit service monitoring report documents TheBus service performance for all 104 routes against the system-wide service standards and policies to identify disparities between routes serving minority and non-minority populations. (Attachment 7)

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I. GENERAL REQUIREMENTS AND GUIDELINES FOR ALL FTA RECIPIENTS

Section 1: Requirement to Notify Beneficiaries of Protection Under Title VI

Title 49 CFR Section 21.9(b) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, recipients shall disseminate this information to the public by posting a Title VI notice on the agency's website and in public areas of the agency's office(s), including the reception desk, meeting rooms, etc. Recipients should also post Title VI notices at stations, stops, and/or on transit vehicles. The notices shall be translated into languages other than English, as needed and consistent with the DOT LEP Guidance and the recipient's language assistance plan.

The Title VI (TVI) Notice to the Public is posted at the following locations.

- Department of Transportation Services, Public Transit Division, 3rd Floor Lobby.
- Oahu Transit Services: TheBus Customer Service Office, TheBus Pass Office.
- TheHandi-Van Eligibility Center.
- Car cards within fixed route public transit vehicles.
- Websites:
    - City & County of Honolulu Department of Transportation Services

      http://www.honolulu.gov/cms-dts-menu/site-dts-sitearticles/1883-thebus-non-discrimination-title-vi-policy.html

    - Oahu Transit Services: TheBus and TheHandi-Van

      http://www.thebus.org/AboutTheBus/TitleVI.asp

      http://www.thebus.org/thehandivan/thehandivan.asp

The TVI Notice is also mailed out in all TheHandi-Van Eligibility Center recertification and new applicant packages.

The TVI Notice is shown below.

Department of Transportation Services

TheBus
City and County of Honolulu

Notifying the Public of Rights Under Title VI

The City and County of Honolulu

The City and County of Honolulu operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City and County of Honolulu.

For more information on the City and County of Honolulu's civil rights program, and the procedures to file a complaint, contact 808-768-8374; email thebusstop@honolulu.gov; or visit our administrative office at 650 South King Street, 3rd Floor, Honolulu, Hawaii 96813. For more information, visit http://www.honolulu.gov/dts/aboutus/publictransit/.

If information is needed in another language, call 808-768 8374.

- 如需此信息的其他语言版本，请致电808-768-8374。(中文)
- Ika e auchea epwe kawor awewen poraus non kapasen ew fonu, kokori 808-768-8374. (Kapasen Chuuk)
- No masapul ti impormasion iti sabali a lengguahe, awagan ti 808-768-8374. (Ilokano)
- 他の言語での情報が必要でしたら808-768-8374までお電話ください。(日本語)
- Kung kinakailangan ang impormasyon sa ibang wika, tumawag sa 808-768-8374. (Tagalog)

Department of Transportation Services

The Handi-Van

Notifying the Public of Rights Under Title VI

The City and County of Honolulu

- The City and County of Honolulu operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City and County of Honolulu.
- For more information on the City and County of Honolulu's civil rights program, and the procedures to file a complaint, contact (808) 768-8300; email handivan@honolulu.gov; or visit our administrative office at 650 South King Street, 3rd Floor, Honolulu, Hawaii 96813. For more information, visit http://www.honolulu.gov/dts/aboutus/publictransit/.
- If information is needed in another language, call (808) 768-8300.
  - 如需此信息的其他语言版本，请致电 (808) 768-8300。(中文)
  - Ika e auchea epwe kawor awewen poraus non kapasen ew fonu, kokori (808) 768-8300. (Kapasen Chuuk)
  - No masapul ti impormasion iti sabali a lengguahe, awagan ti (808) 768-8300. (Ilokano)
  - 他の言語での情報が必要でしたら (808) 768-8300 までお電話ください。(日本語)
  - Kung kinakailangan ang impormasyon sa ibang wika, tumawag sa (808) 768-8300. (Tagalog)

The TVI Car Card is shown below.

YOU HAVE RIGHTS

TheBus shall not discriminate based on race, color, national origin, gender, or disability and ensures transportation equity for all communities regardless of income level and social standing.

~Reference Title VI of the 1964 Civil Rights Act & Environmental Justice 1994

MERON KANG KARAPATAN

Ang TheBus ay walang pinagkakaitan na sinuman base sa kanyang lahi, kulay, orihinal na pinagmulan, kasarian, o kakulangan at pinapasiguro ang karapatan sa lahat ng pamayanan kahit na mababa ang kita o anuman ang katayuan nito sa buhay.

~Reference Title VI of the 1964 Civil Rights Act & Environmental Justice 1994

ADDA KARBENGAM

Ti TheBus ket haan nga mangiduma babaen ti lahi, kolor, nasyonal nga kapoonan, wennu kinakurang ken ipatalged na ti pada pada nga serbisyo ti sakop ti komunidad ti siasinuman uray kadaguiti nababa ti sapol na ken anya man ti kinatao na.

~Reference Title VI of the 1964 Civil Rights Act & Environmental Justice 1994

Questions/complaints:
Nu adda damagen wen reklamo:

City & County of Honolulu
Department of Transportation Services
Frank F. Fasi Municipal Building
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813
(808) 768-8396

Hawaii Civil Rights Commission
Princess Keelikolani Building
830 Punchbowl Street, Room 411
Honolulu, Hawaii 96813
(808) 586-8636

U.S. Department of Transportation
Federal Transit Administration
Office of Civil Rights, Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105-1839

For Title VI & Environmental Justice Information, go to: www.honolulu.gov/dts or www.thebus.org.

Paid for by the taxpayers of the City & County of Honolulu

貴方には権利があります

ザ・バスは人種、又は肌の色、出身地、性別、障害に基づいて差別をせず、所得水準と社会的地位に関係なく
全ての地域社会へ対し公平な交通手段を提供しています。

～引用 １９６４年第四公民権運動 １９９4年環境正義

您有權

TheBus 公司不得依據族裔、膚色、原國籍、性別、或殘障而歧視，同時要確定所有社區人士，無論收入水平及社會標準，均享有交通平等權

~參考 1964 民權法案第六章及 1994 年環境正義

당신의 권리

TheBus 회사는 인종 피부색 출신국가 성별 장애자에 따라 차별하지 않습니다.
동시 지역사회의 모든 구성원 과 저소득 및 사회적 기준에 관계없이 동등한 트래픽 권리를 받습니다.

~참고 *1964*년 민권법 제*6*장 및 *1994*년 환경정의

Questions/complaints:
質問・苦情:
有問題/要投訴:
문제시/불평 소송:

City & County of Honolulu
Department of Transportation Services
Frank F. Fasi Municipal Building
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813
(808) 768-8396

Hawaii Civil Rights Commission
Princess Keelikolani Building
830 Punchbowl Street, Room 411
Honolulu, Hawaii 96813
(808) 586-8636

U.S. Department of Transportation
Federal Transit Administration
Office of Civil Rights, Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105-1839

For Title VI & Environmental Justice Information, go to: www.honolulu.gov/dts or www.thebus.org.

Paid for by the taxpayers of the City & County of Honolulu

EWOR AM JIMWE

TheBus ejelok an nirbotak jekdron armij eo ej jen ia, color in enbwinin, lal eo an, eman ak kora, ak wor mojno ilo enbwinin ak lale bwe en wor jimwe im jokin wot juon ial nan aolep weto ko mekarta weto ta im armij in ia.

~Reference Title VI of the 1964 Civil Rights Act & Environmental Justice 1994

MI WOR OM PWUUNG

EweBus esapw toongeni nifinifin aramas reen sokkun aramas, onuwen aramas, aramasen ekis, niemwan/niefefin, ika aramas mei ter inisiir, nge epwe wenechar aan angang ngeni meinisin ina mwo ika mi osupwang ika ese pwan wor itan non nonnomwun.

~Reference Title VI of the 1964 Civil Rights Act & Environmental Justice 1994

BẠN CÓ QUYỀN

TheBus sẽ không dựa vào chủng tộc, màu da, nguồn gốc quốc gia, giới tính, hoặc khuyết tật v.v. của hành khách mà có sự phân biệt đối xử, và đảm bảo giao thông vận chuyển công bằng cho tất cả các cộng đồng bất kể mức thu nhập và địa vị xã hội của họ.

~Tham khảo tiêu đề VI của Đạo luật Dân quyền năm 1964; Luật môi trường công lý năm 1994

Questions/complaints:
Câu hỏi/khiếu nại:

City & County of Honolulu
Department of Transportation Services
Frank F. Fasi Municipal Building
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813
(808) 768-8364

Hawaii Civil Rights Commission
Princess Keelikolani Building
830 Punchbowl Street, Room 411
Honolulu, Hawaii 96813
(808) 586-8636

U.S. Department of Transportation
Federal Transit Administration
Office of Civil Rights, Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105-1839

For Title VI & Environmental Justice Information, go to: www.honolulu.gov/dts or www.thebus.org.

Paid for by the taxpayers of the City & County of Honolulu

Section 2: Requirement to Develop Title VI Complaint Procedures and Complaint Form

In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), all recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. FTA requires direct and primary recipients to report information regarding their complaint procedures in their Title VI Programs in order for FTA to determine compliance with DOT's Title VI regulations.

In addition to developing complaint procedures, recipients must also develop a Title VI complaint form, and the form and procedure for filing a complaint shall be available on the recipient's website.

The TVI Complaint Procedures and Form are on the following websites:

- City & County of Honolulu Department of Transportation Services (DTS)

  http://www.honolulu.gov/cms-dts-menu/site-dts-sitearticles/1883-thebus-non-discrimination-title-vi-policy.html

- Oahu Transit Services (OTS): TheBus and TheHandi-Van

  http://www.thebus.org/AboutTheBus/TitleVI.asp

  http://www.thebus.org/thehandivan/thehandivan.asp

Complaint Forms (Attachment 1) are available at the following locations and in the languages identified in the Limited English Proficient (LEP) Plan (Attachment 3).

- Download from DTS and OTS websites listed above.
- Through mail or email by calling DTS at (808)768-8396, or emailing TheBusStop@honolulu.gov or handivan@honolulu.gov
- In-person at:
  DTS (650 South King St., 3rd Floor)
  OTS TheBus Customer Service Office (811 Middle St.)
  OTS TheBus Pass Office (Kalihi Transit Ctr, Middle St. at Kamehameha Hwy.)
  TheHandi-Van Eligibility Center (1100 Ward Ave., Suite 835)

The Complaint Process displayed below has been extracted from the official DTS website.

Title VI Non-Discrimination Policy

The City & County of Honolulu, Department of Transportation Services (DTS), as a recipient of Federal funds, has certified and provided assurances that it, and Oahu Transit Services, Inc. (OTS), the non-profit corporation contracted by DTS to provide TheBus and TheHandi-Van services, will fully comply with Title VI of the Civil Rights Act of 1964. DTS, and OTS, are committed to ensuring that no person using public transit services is discriminated against on the basis of race, color, or national origin, particularly in the following service areas:

- Scheduling
- Quality of service
- Frequency of service
- Age and quality of vehicles assigned to routes
- Quality of stations serving different routes
- Location of routes

Title VI Notice

You Have Rights. TheBus and TheHandi-Van shall not discriminate based on race, color, or national origin, and ensures transportation equity for all communities regardless of income level.

- referencing Title VI and Environmental Justice

TheBus Title VI Notice Downloads:

- English (118KB PDF)
- Chinese (中文) (135KB PDF)
- Japanese (日本語) (202KB PDF)
- Ilokano (94KB PDF)
- Tagalog (94KB PDF)
- Chuukese (Kapasen Chuuk) (95KB PDF)

TheHandi-Van Title VI Notice Downloads:

- English (153KB PDF)
- Chinese (中文) (82KB PDF)
- Japanese (日本語) (149KB PDF)
- Ilokano (40KB PDF)
- Tagalog (40KB PDF)
- Chuukese (Kapasen Chuuk) (41KB PDF)

What is Title VI

Title VI of the Civil Rights Act of 1964 prohibits discrimination in programs and activities receiving Federal financial assistance on the basis of race, color, or national origin.

The City & County of Honolulu, Department of Transportation Services (DTS), and the non-profit corporation it has contracted to provide fixed route services, "TheBus," and paratransit services, "TheHandi-Van," are committed to ensuring that no person is discriminated against while using TheBus or TheHandi-Van as prohibited by Title VI of the Civil Rights Act of 1964. Any person using TheBus or TheHandi-Van who believes he or she is a victim of such discrimination may file a complaint with DTS.

Title VI protections have been extended via two Presidential Executive Orders to Environmental Justice, which also protects persons of low income, and Limited English Proficiency.

Who can complain

Anyone who believes that he or she has been discriminated against while using TheBus or TheHandi-Van may file a Title VI complaint with DTS.

How to file a Title VI discrimination complaint

If a person believes he or she has been discriminated against in using TheBus or TheHandi-Van, they may file a signed, written complaint within one hundred eighty (180) days of the date of alleged discrimination. Complaints should provide the following information:

- Complainant's name, address, and contact information (telephone number, email address, etc.)
- How, when, where, and why the complainant believes he or she was discriminated against
- Location, names, and contact information of any witnesses

File the complaint in writing with DTS, Public Transit Division at:

Fixed Route Operations
Public Transit Division
Department of Transportation Services
City & County of Honolulu
Frank. Fasi Municipal Building
650 South King Street, Third Floor
Honolulu, Hawaii 96813-3017

Email: TheBusStop@honolulu.gov
Phone: (808) 768-8374

Paratransit Operations
Public Transit Division
Department of Transportation Services
City & County of Honolulu
Frank. Fasi Municipal Building
650 South King Street, Third Floor
Honolulu, Hawaii 96813-3017

Email: handivan@honolulu.gov
Phone: (808) 768-8300

If the complainant is unable to write a complaint, DTS will provide assistance.

Printable Complaint Form Downloads:

- English (18KB PDF)
- Chinese (中文) (156KB PDF)
- Japanese (日本語) (144KB PDF)
- Ilokano (296KB PDF)
- Tagalog (95KB PDF)
- Chuukese (Kapasen Chuuk) (106KB PDF)

In addition to the Title VI complaint process at DTS, a complainant may also file a Title VI complaint with an external entity, such as:

- U.S. Department of Transportation
  Federal Transit Administration
  Office of Civil Rights, Region IX
  201 Mission Street, Suite 1650
  San Francisco, California 94105-1839

- Other agency, Federal or state

- A court, Federal or state

If a complaint is filed with both DTS and an external entity, the external complaint will supersede the DTS complaint and DTS' complaint procedures will be suspended until the external entity produces its findings.

How DTS handles complaints

Complaints that allege discrimination while using TheBus or TheHandi-Van services, provided by DTS, through OTS, will be recorded in the Discrimination Complaint Log and immediately assigned a complaint number by DTS, Public Transit Division.

DTS will review the Title VI complaint and will provide appropriate assistance to complainants, including those who have limited English proficiency (LEP).

DTS will investigate a formal Title VI complaint within ten (10) working days of receiving the complaint. Based upon all of the information received, DTS will prepare a draft written response, subject to review by the City & County of Honolulu's Corporation Counsel.

DTS will contact the complainant in writing within fifteen (15) working days for additional information, if needed, to investigate the complaint. If the complainant fails to provide the requested information by a certain date, the complaint could be administratively closed.

Corporation Counsel will determine if the complaint may be administratively closed after the draft is written, or if a final written response is needed. If a final written response is needed, DTS will send the response to the complainant and advise the complainant of his or her right to file a complaint externally.

The complainant also will be advised of his or her right to appeal the response to Federal and state authorities as appropriate. DTS will diligently attempt to respond to a complaint within sixty (60) working days of its receipt by DTS, unless it was also filed with an outside agency, as noted above.

How DTS notifies a complainant of the outcome

DTS will send a final written response to the complainant and advise the complainant of his or her right to file a complaint externally. DTS will diligently attempt to respond to complaints within sixty (60) workdays of its receipt.

Section 3: Requirement to Record and Report Transit-Related Title VI Investigations, Complaints, and Lawsuits

In order to comply with the requirements of 49 CFR Section 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by the entities other than FTA; lawsuits; and complaints naming the recipient. This list shall include the date that the investigation, lawsuit, or complaint was filed; summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to, the investigation, lawsuit, or complaint.

The table below lists the 2016, 2017, and 2018 Title VI complaints, investigations, and lawsuits filed against DTS-PTD and OTS.

Title VI Log: Investigations, Lawsuits, Complaints 2016 – 2018				
	Date	**Grounds of Complaint**	**Status**	**Action(s) Taken**
Investigations				
1. 2018-01	10/19/18	Race/Disability/Color	Invalid	Dismissed
Lawsuits				
1.	04/17/2016	Race	Invalid	Dismissed
2.	10/25/2017	Race	Invalid	Dismissed
Complaints				
1. M-003169K	05/02/2016	Race	Inconclusive	Dismissed
2. 2016-01	11/29/2016	Race	Inconclusive	Dismissed

Section 4: Promoting Inclusive Public Participation

The content and considerations of Title VI, the Executive Order on LEP, and the DOT LEP Guidance shall be integrated into each recipient's established public participation plan, which explicitly describes the proactive strategies, procedures, and desired outcomes that underpin the recipient's public participation activities. Efforts to involve minority and LEP populations in public participation activities can include both comprehensive measures, such as placing notices at all transit stations, stops, and vehicles, as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in a recipient's decision-making process.

Promoting inclusive public participation is accomplished through DTS-PTD's Public Participation Plan. (Attachment 2)

In an effort to receive feedback on the 2019 Public Transit TVI Program from the public and organizations involved with minority, low-income, and LEP populations, the following outreach measures will be taken:

- Honolulu City Council
    - Distribution to the 9 Councilmembers.
    - Presentation to the Council Transportation Committee.
    - Presentation to Councilmembers upon request.

- Neighborhood Boards
    - Distribution to the 33 Boards.
    - Presentation at Board meetings upon request: Makakiko/Kapolei/Honokai Hale, Waianae Coast, Kuliouou-Kalani Iki, Hawaii Kai.

- Committee for Accessible Transportation
    - Distribution and presentation to committee members.

- Electronic Information
    - The Program is posted to both the DTS and OTS TheBus & TheHandi-Van websites.

- Other Means/Methods
    - Coordination with other Agencies.
    - Screen reader format for persons with low vision upon request.
    - Mail or email upon request.

Section 5: Requirement to Provide Meaningful Access to Limited English Proficient Persons

Consistent with Title VI of the Civil Rights Act of 1964, DOT's implementing regulations, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, Aug. 11, 2000), 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). The recipient shall develop an assistance plan to address the identified needs of the LEP population(s) it services.

DTS-PTD is committed to providing meaningful access to its services by Limited English Proficient (LEP) persons. The 2019 LEP Plan identifies appropriate language assistance measures needed to improve access to public transit services by LEP persons.

DTS-PTD utilizes contracted phone interpretation services (over 100 languages) and translates vital documents in the languages identified in the LEP Plan; translation in other languages may be provided to the maximum extent feasible and on a case-by-case basis.

A copy of DTS-PTD's 2019 LEP Plan can be found at Attachment 3.

Section 6: Minority Representation on Planning and Advisory Bodies

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, "deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program." Recipients that have transit-related, nonelected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

DTS is not involved in the selection of members for the following committees or boards.

The Honolulu City Council (Council) is DTS-PTD's approving body and members are elected.

The Rate Commission and Committee for Accessible Transportation (CAT) are two DTS-PTD's advisory committees that are comprised of non-elected members. The Honolulu Authority for Rapid Transit (HART) is a semi-autonomous City agency and subrecipient of DTS' FTA grant funding.

The Rate Commission members are appointed by the Mayor and the Council. The CAT is comprised of representatives from the nine (9) agencies listed below.

Committee for Accessible Transportation Agencies:

- Access to Independence
- Adult Day Centers of Hawaii
- Aloha Independent Living Hawaii
- Catholic Charities Hawai'i
- Easter Seals Hawaii
- Hawaii Disability Rights Center
- Ho'opono Services for the Blind
- KOKUA Program: University of Hawaii Manoa
- Lanakila Pacific

The current HART Board of Directors consists of thirteen (13) non-elected, volunteer members. Ten (10) members are appointed by the Mayor and the Honolulu City Council, and three (3) are the State Department of Transportation Director, the City Department of Transportation Services Director, and the City Department of Planning and Permitting Director.

Section 7: Monitoring Subrecipients

In accordance with 49 CFR 21.9(b), and to ensure that subrecipients are complying with the DOT Title VI regulations, primary recipients must monitor their subrecipients for compliance with the regulations. Importantly, if a subrecipient is not in compliance with the Title VI requirements, then the primary recipient is not in compliance.

In order to ensure subrecipients are in compliance with TVI requirements, subrecipients may develop their own TVI program or follow DTS' Public Transit TVI program. DTS-PTD will assist all subrecipients with Title VI compliance as necessary and appropriate.

Subrecipients who develop their own TVI program must submit it to DTS-PTD for compliance review every three years.

DTS-PTD monitors all subrecipients for TVI compliance on an annual basis through on-site visits, communication, and review of relevant records, documents, and website content. Subrecipients are notified of monitoring results within 30 days of the monitoring completion date. If a subrecipient is determined to be non-compliant, deficiencies must be corrected within 30, 60, or 90 days of the monitoring completion date. DTS-PTD will issue a notice that corrective actions have been satisfactorily completed within 30 days of the completion date.

A copy of DTS-PTD's TVI Oversight of Subrecipients, Lessees, and Third Party Contactors policies and procedures can be found at Attachment 4.

Section 8: Determination of Site or Location of Facilities

The recipient shall complete a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. Facilities include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. Facilities do not include bus shelters and transit stations, power substations, etc. are evaluated during project development of the NEPA process.

DTS is currently conducting three planning studies to develop transit facilities on existing City owned properties. All three properties are located in non-minority and non-low income Census block group areas.

- Ala Moana Transit Plaza – new transportation facility that will facilitate transfers between bus and rail transit modes for public transit system passengers. It is envisioned as a multi-modal transit plaza with support facilities for bike-share operations and bus transit vehicles, including short-term parking, layovers, and electric charging stations.

- Kapolei Maintenance Facility and Transit Center – development of a new support facility for the public transit system, including new administration, maintenance and parking facilities to serve as the West Oahu base for the bus transit fleet.

- Royal Kunia Public Transit Facility – redevelopment of the existing Royal Kunia park-and-ride facility and transit center as a mixed-use facility including a light duty maintenance facility for the City and County of Honolulu's paratransit (TheHandi-Van) vehicles, public transit park-and-ride and transit center, and a multi-generational day care facility.

A copy of DTS-PTD's Determination of Site or Location of Facilities policies and procedures can be found at Attachment 5.

Section 9: Approval of the TVI Program by Governing Entity

The recipient must provide a copy of board meeting minutes, resolutions, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved by the Title VI Program. The approval must occur prior to submission to the FTA.

DTS will submit the 2019 Public Transit Title VI Program to the Honolulu City Council for approval through its Transportation Committee. Tentative meeting dates are:

- April 25, 2019 Transportation Committee Meeting
- May 8, 2019 Honolulu City Council

II. REQUIREMENTS AND GUIDELINES FOR FIXED ROUTE TRANSIT PROVIDERS

Section 10: Requirement to Set System-wide Service Standards

This requirement applies to all fixed route providers of public transportation service. Appendix C to 49 CFR part 21 provides in Section (3)(iii) that "*no person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of service of transportation service furnished as a part of the project on the basis of race, color, or national origin. Frequency of service, age, and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes may not be determined on the basis of race, color, or national origin."

System-wide Service Standards:

- Vehicle load for each mode
- Vehicle headway for each mode
- On-time performance for each mode
- Service availability

TheBus Service Modes:

- Rapid Bus (limited stop) Routes
- Trunk Routes
- Circulator Routes
- Peak Hour Express Routes
- Community Access

Vehicle Load

For most of the time, TheBus services operate with sufficient frequency to provide every passenger with a seat. However, during the heaviest travel times or locations, passengers will experience standing loads. During these periods, DTS strives to provide sufficient service so that passengers are reasonably comfortable.

The purpose of the vehicle load standard is to define the levels of crowding that are acceptable by mode and time period. DTS defines vehicle load factor as the ratio of passengers on board to the number of seats on a vehicle. There are a number of different types of vehicles in the TheBus fleet at any given time, and the fleet changes over time. Hence, the actual seating capacity and maximum number of passengers allowed by the comfort standards for each mode changes periodically.

The DTS will measure the passenger miles that experiences overcrowded conditions during each time period. The DTS standard is that no more than 10% of annual passenger miles shall exceed the vehicle load factor standard for overcrowding. DTS will evaluate routes that do not meet the 10% standard to address overcrowding.

Maximum vehicle load factors for all modes and periods are defined in the following table.

Comfortable Vehicle Load Factors						
	Weekday					**Weekend**
Service Mode	**AM Peak (1st bus – 9am)**	**Base (9am – 2pm)**	**PM Peak (2pm – 6pm)**	**Night (6pm – 12pm)**	**Night Owl (12pm – last Bus)**	**All Day**
Rapid Bus	1.4	1.2	1.4	1.2	1.2	1.2
Trunk	1.4	1.2	1.4	1.2	1.2	1.2
Circulator,	1.4	1.2	1.4	1.2	1.2	1.2
Peak Hour Express	1.2	NA	1.2	NA	NA	1.2
*Community Access	1.4	1.2	1.4	1.2	1.2	1.2

*Currently, there is no Community Access service.

Vehicle Headway

Vehicle headway is defined as amount of time between two vehicles traveling in the same direction on the same route. Scheduling headway across service modes and time periods is affected by the following factors, including but not limited to: ridership, route length, traffic congestion/conditions, population density, demand generators, and budget constraints.

Vehicle Headway Standard (in minutes)						
	Weekday					Weekend
Service Mode	**AM Peak (1st bus – 9am)**	**Base (9am – 2pm)**	**PM Peak (2pm – 6pm)**	**Night (6pm – 12m)**	**Night Owl (12pm – last bus)**	**All Day**
Rapid Bus	15	30	15	30	D	30-45
Trunk	20	30	20	45	D	30-60
Circulator	30	45	30	60	D	60
Peak Hour Express	D	NA	D	NA	NA	NA
*Community Access	D	D	D	D	D	D

*Currently, there is no Community Access service. D: As appropriate to meet demand

On-Time Performance

The average measure of runs completed as scheduled.

- On-time is measured as 2 minutes early to 5 minutes late of scheduled arrival and departure times.
- Early is greater than 2 minutes of the scheduled departure time.
- Late is greater than 5 minutes of the scheduled arrival time.

The Standard for all service modes is 80%.

Service Availability

A general measure of the distribution of routes within an agency's service area.

Standard:
Route availability within a ½ mile radius for 80% of the population.

Section 11: Requirement to Set System-wide Service Policies

Policies must include:

- ***Distribution of transit amenities for each mode***
- ***Vehicle assignment for each mode***

Distribution of Transit Amenities

Items of comfort, convenience, and safety, such as seating, shelter, trash receptacles, and lighting.

Policy:

- All amenities shall comply with ADA Accessibility Guidelines (ADAAG)
- Installation at stops along bus routes are typically based on number of passenger boardings, number of routes served, transfer point, headways, and space requirements.

Amenities	Stop Characteristics for Distribution
Shelter	Transfer points, two or more bus routes, headways >40 minutes, average to high proportion of passenger boardings in relation to route ridership
Bench	Transfer points, two or more bus routes, headways >30 minutes, average proportion of passenger boardings in relation to route ridership
Trash Receptacle	Transfer points, two or more bus routes, headways >15 minutes, medium to high proportion of passenger boardings in relation to route ridership and/or adjacent to trash receptacle use generator(s).
Provision of Information	As needed and appropriate

Vehicle Assignment

Process by which transit vehicles are assigned to routes. All buses are wheelchair accessible and equipped with bike racks. Low floor buses have ramps and high floor buses have lifts.

Policy:

Vehicles assignments are based on the operating characteristics of the route such as ridership, service mode, and roadway conditions (narrow, steep, tight turns). Typically, 60-foot buses are assigned to Rapid Bus, high ridership, or long-distance routes; 40-foot buses to trunk/circulator routes; and 30/35-foot buses to circulator/community access routes where ridership complements vehicle capacity and routes with streets that are narrow, steep, or have tight turns. High floor buses, while no longer manufactured and older in age, have a greater seating capacity than low floor buses and are equipped with a wheelchair lift instead of a ramp; and are assigned to routes with unimproved right-of-ways where lifts are more conducive, routes prone to ponding/flooding conditions, and routes where ridership is a little too high to be adequately accommodated by a low floor bus.

Section 12: Requirement to Collect and Report Demographic Data

Title 49 CFR 21.9 (b) states that recipients "should have available for the Secretary racial and ethnic data showing the extent to which members of minority groups are beneficiaries of programs receiving Federal financial assistance." FTA requires transit providers to prepare the following maps and charts:

Demographic data for Maps 1 – 4 is based on the Oahu Metropolitan Planning Organization Title VI/Environmental Justice Analysis Update Report (September 2016).

For the purpose of this report, these maps are reduced samples of the full large scale maps available at DTS-PTD and contain only the details that were visible at the reduced scale.

- Map 1 Base Service Area: Base map of the service area that overlays Census block groups, with bus facilities, transit centers, park-and-rides, and bus routes.

- Map 2 Title VI Areas: Demographic map that plots the bus routes shown in the base service area and shades those Census block groups where the percentage of the total minority population residing in these areas exceeds the average percentage of minority populations for the service area as a whole.

- Map 3 Environmental Justice Areas: Demographic map that plots the bus routes shown in the base service area and shades those Census block groups where the percentage of the total low income population residing in these areas exceeds the average percentage of low income populations for the service area as a whole.

- Map 4 Title VI & Environmental Justice Areas: Demographic map that plots the bus routes shown in the base service area and combines the Title VI and Environmental Justice areas shown in Maps 2 and 3. Shaded areas indicate minority, low income, and a combination of minority and low income Census block groups.

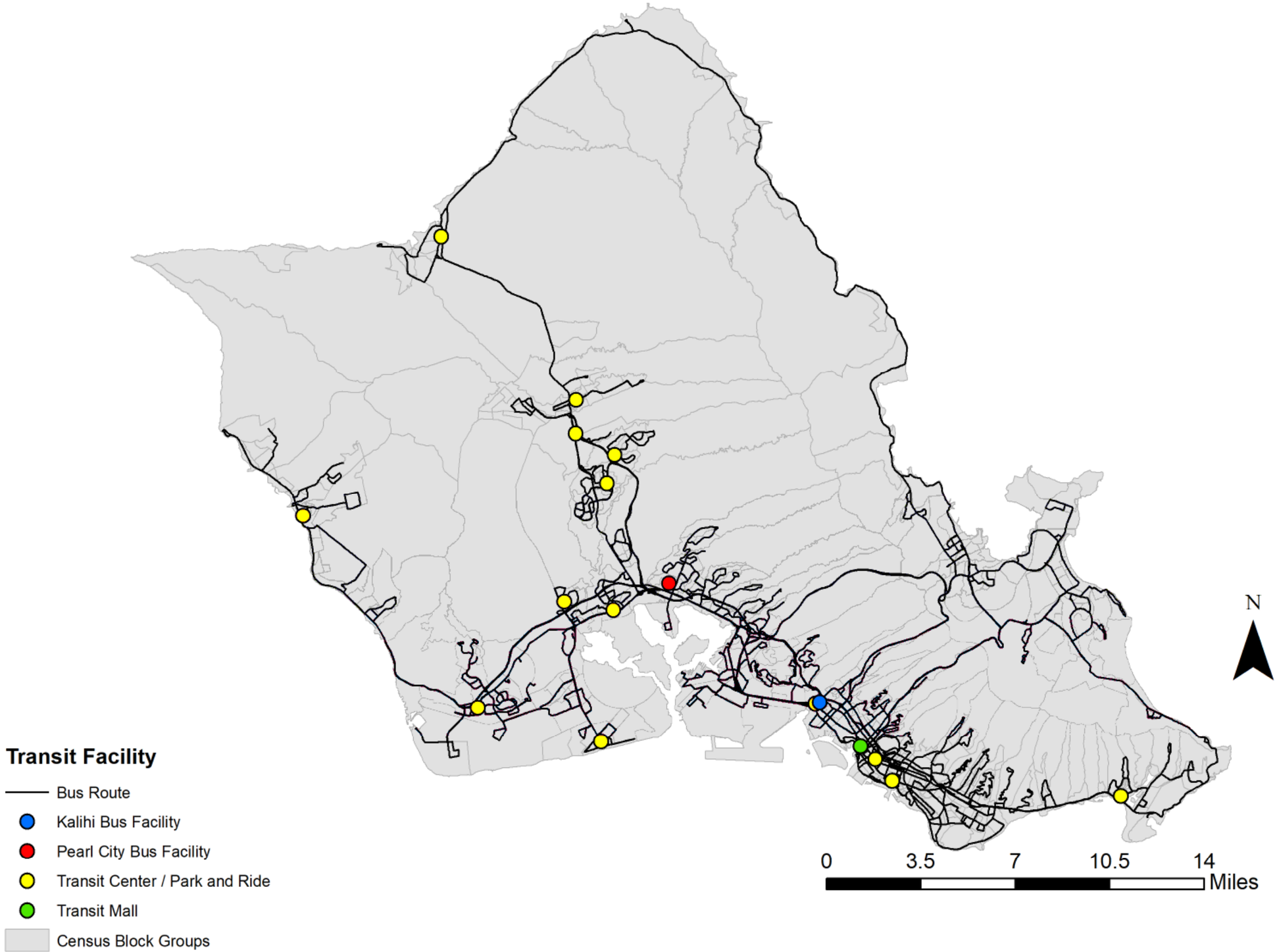
The following are also included:

- Link to individual route maps: http://www.thebus.org/Route/Routes.asp.

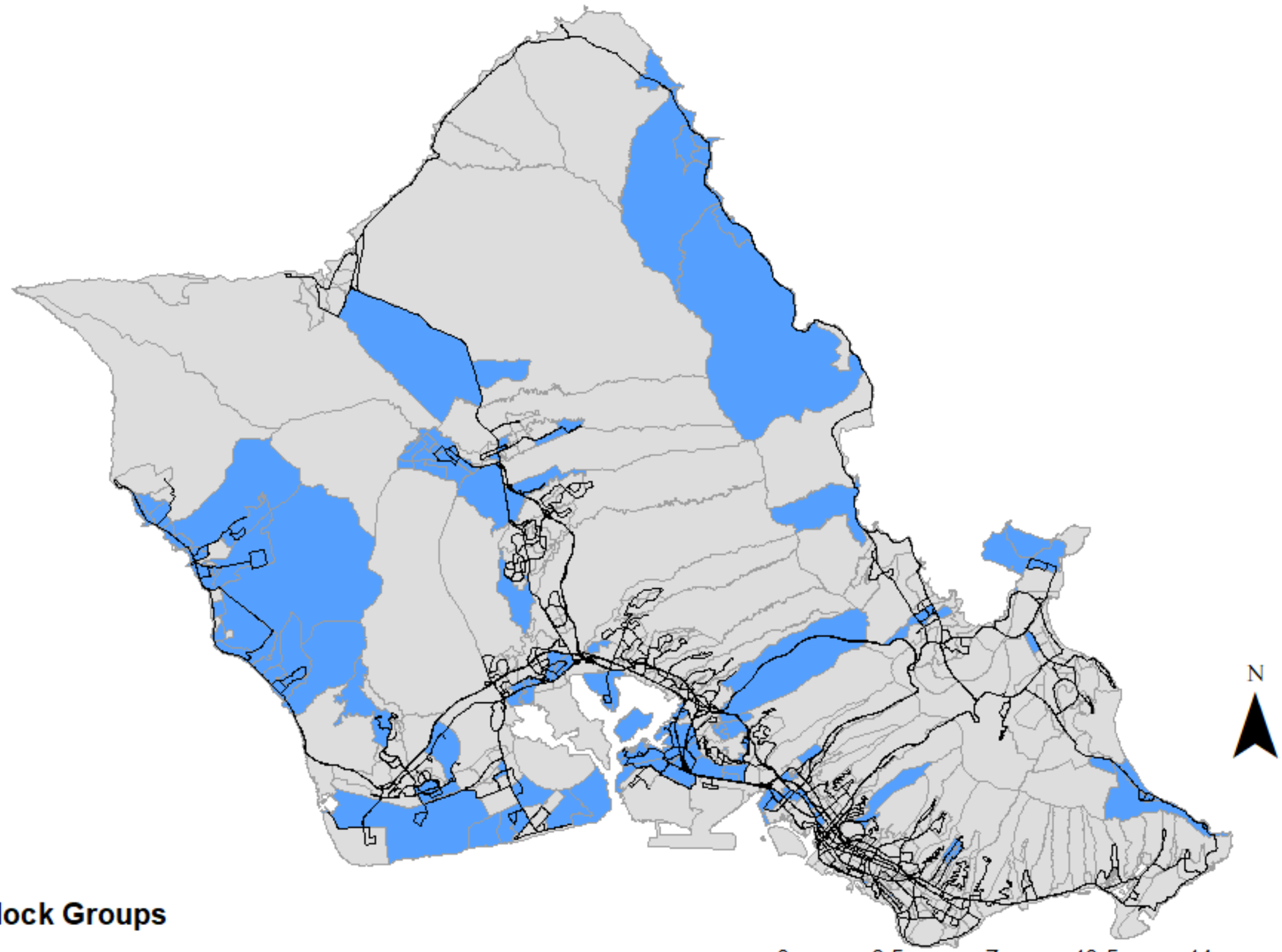
- Figure 1 showing the ethnic group breakdown of Honolulu based on the Oahu Metropolitan Planning Organization Title VI/Environmental Justice Analysis Update Report (September 2016).

- Figure 2 listing the 104 bus route service areas and the percentage of TVI/EJ populations in the service area.

Map 1: Base Service Area



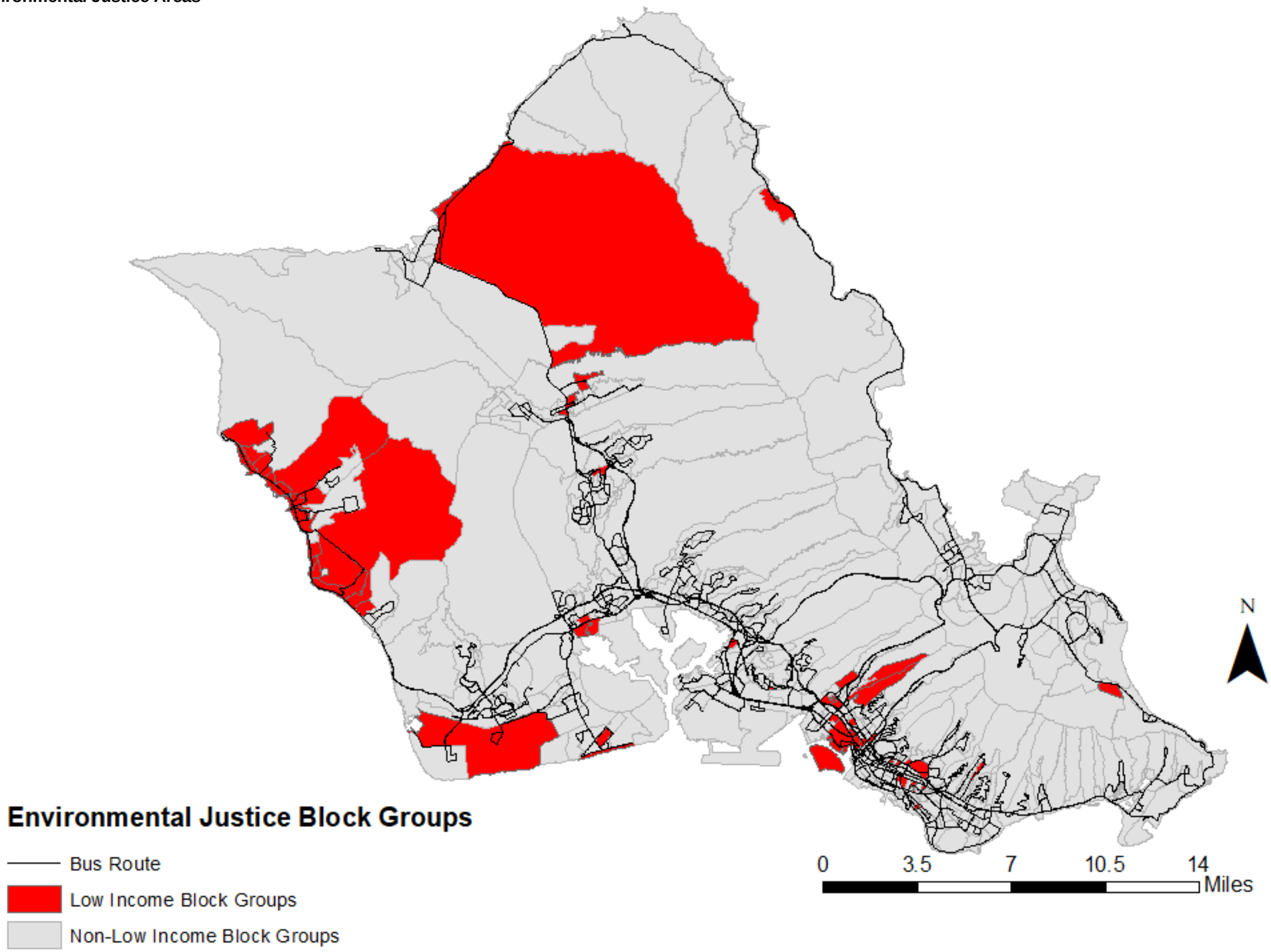
Map 2: Title VI Areas



Title VI Block Groups

- Bus Route
- Minority Block Groups
- Non-Minority Block Groups

Map 3: Environmental Justice Areas



Map 4: Title VI and Environmental Justice Areas

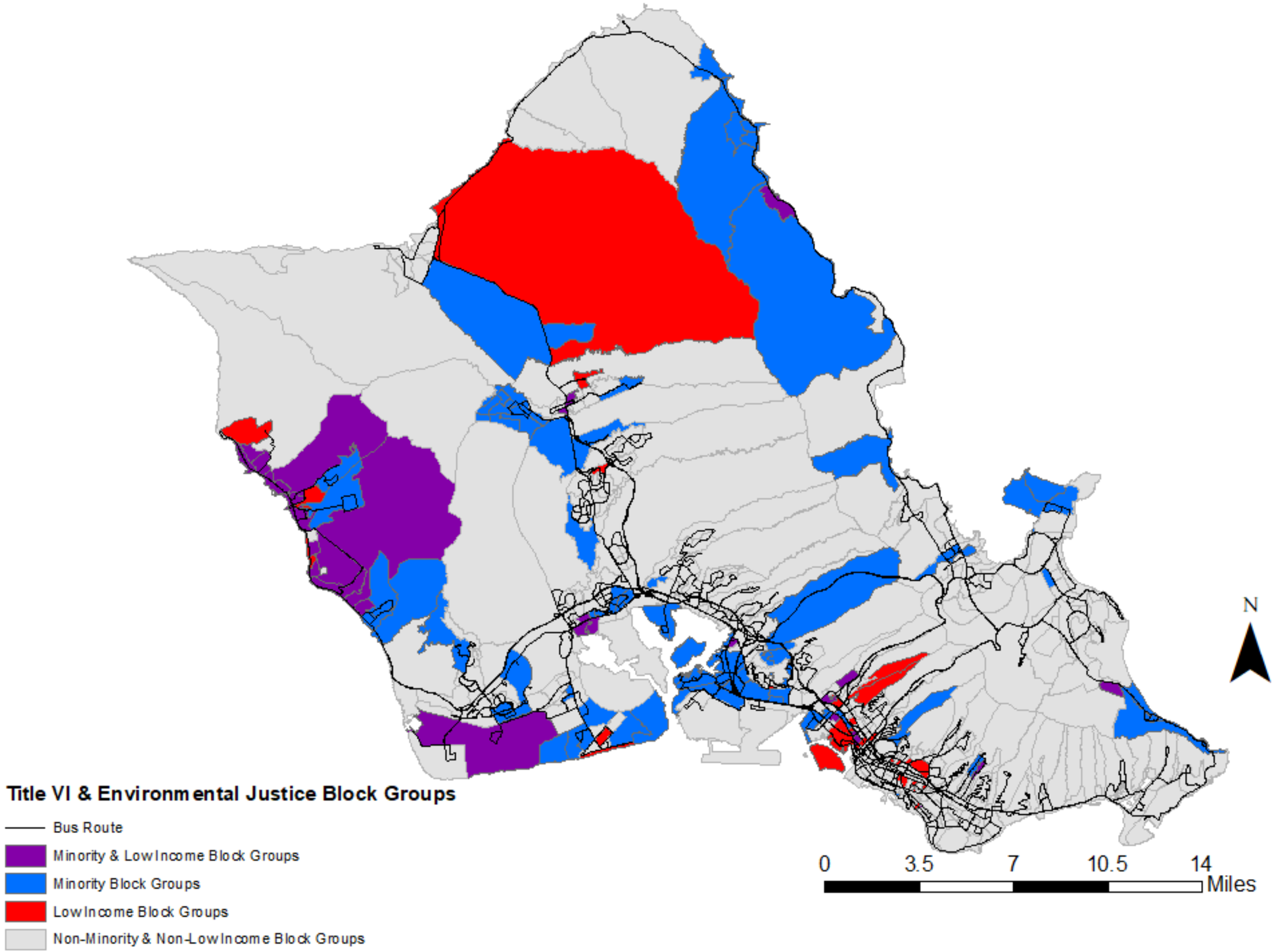
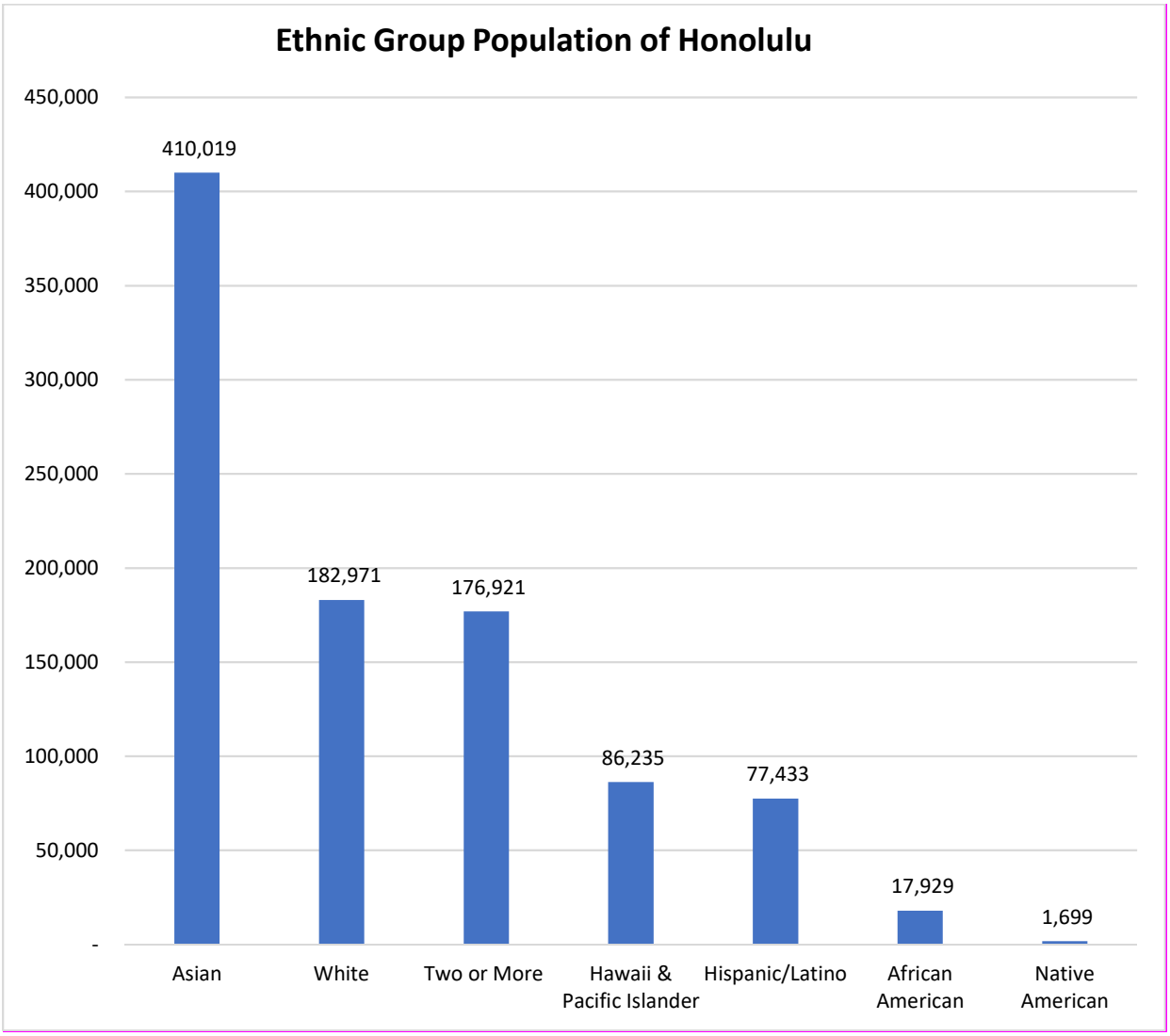


Figure 1
Ethnic Breakdown



(Source: The Oahu Metropolitan Planning Organization Title VI/Environmental Justice Analysis Update Report, September 2016)

As of 2016, Honolulu had a population of about 953,000. The ethnic breakdown, based on U.S. Census categories were:

- Asian: 410,019
- White: 182,971
- Two or More: 176,921
- Hawaii/Pacific Islander: 86,235
- Hispanic/Latino: 77,433
- African American: 17,929
- Native American: 1,699

Figure 2
Bus Route Summary: Proportion of TVI/EJ Served Populations
(Title VI/EJ Routes Shaded)

Route (Service Area)	% TVI/EJ in Service Area	Route (Service Area)	% TVI/EJ in Service Area	Route (Service Area)	% TVI/EJ in Service Area	Route (Service Area)	% TVI/EJ in Service Area
1	23	42	36	89	29	501	8
2	24	43	45	90	22	503	24
3	23	44	41	91	36	504	10
4	19	51	32	92	29	1L	19
5	21	52	29	93	56	2L	24
6	18	53	23	94	25	57A	15
7	45	54	21	96	29	80A	11
8	14	55	29	97	25	80B	17
9	30	56	19	98	29	84A	23
10	35	57	20	99	24	85A	27
11	23	65	19	101	32	88A	35
13	22	70	19	102	33	98A	21
14	5	71	0	103	28	9S	15
15	13	72	68	234	0	A	35
16	63	73	24	235	0	C	49
17	17	74	10	401	100	E	28
18	15	76	2	402	99	PH1	76
19	32	77	34	403	92	PH2	22
20	30	80	11	411	28	PH3	34
22	9	81	38	413	29	PH4	36
23	9	82	12	414	17	PH5	20
24	0	83	29	415	35	PH6	29
31	55	84	25	416	43	PH7	45
32	33	85	20	432	43	W1	35
40	48	87	12	433	29	W2	27
41	41	88	31	434	36	W3	30

(Source: The Oahu Metropolitan Planning Organization Title VI/Environmental Justice Analysis Update Report, September 2016)

Figure 2 above displays the bus routes and the proportion of the service area (within a ½ mile radius of a bus route) designated as TVI/EJ. Of 104 routes, 48 routes are identified as TVI/EJ. Routes were identified as TVI/EJ routes based on a ½ mile radius that the route served. 29% is used as the minimum level for designating routes as TVI/EJ because it is the mean percentage of all TVI/EJ populations within a ½ mile radius among the routes.

TheBus

ROSTER OF BUS ROUTES

Effective 03/04/18

Route No.	Initial	KALIHI DIVISION (54) ROUTE NAME
PH4	KKPH	Kaneohe-Kahaluu-Pearl Harbor Exp.
PH5	WWPH	Windward-Pearl Harbor Express
PH6	HKPH	Hawaii Kai-Pearl Harbor Express
W3	KSX	Kalihi via School Street Express
1	KK	Kaimuki-Kalihi
1L	SHKL	School Street-Hawaii Kai Limited
2	WSM	Waikiki-School-Middle
2L	WSML	Waikiki-School-Middle Limited
3	KSL	Kaimuki-Salt Lake
4	NP	Nuuanu-Punahou
5	AMM	Ala Moana-Manoa
6	PW	Pauoa-Woodlawn
7	KV	Kalihi Valley
8	WAM	Waikiki-Ala Moana
9	KPH	Kaimuki-Pearl Harbor
9s	PV	Palolo Valley
10	KAH	Kalihi-Alewa Heights
11	MHA	Makalapa-Halawa-Aiea Heights
13	LWU	Liliha-Waikiki-University
14	SM	St. Louis-Maunalani
15	MPH	Makiki-Pacific Heights
16	MV	Moanalua Valley
17	MAM	Makiki-Ala Moana
18	UAM	University-Ala Moana
19	WAH	Waikiki-Airport-Hickam
20	WP	Waikiki-Pearlridge
22	BB	Beach Bus
23	HKS	Hawaii Kai-Sea Life Park
24	KAH	Kapahulu-Aina Haina
31	TM	Tripler-Mapunapuna
32	KP	Kalihi-Pearlridge
43	WHA	Waipahu-Honolulu-Alapai
54	HPC	Honolulu-Pearl City
56	HKK	Honolulu-Kailua-Kaneohe
57	KWS	Kailua-Waimanalo-Sea Life Park
57A	KEL	Kailua-Enchanted Lake
70	LM	Lanikai-Maunawili
74	AHH	Aiea-Halawa Heights
77	WK	Waimanalo-Kaneohe
80	HKPR	Hawaii Kai Park & Ride Express
80A	HKPU	Hawaii Kai Park & Ride Express-UH
80B	UAX	Upper Aina Haina Express
82	HKPR	Hawaii Kai Park & Ride Express
85	WWXK	Windward Express-Kaneohe
85A	WWXH	Windward Express-Haiku
87	WWXK	Windward Express-Kailua
89	WKX	Waimanalo-Kailua Express
94	VKKX	Villages of Kapolei-Kaupea Express
97	VPX	Village Park Express
98	WMPR	Wahiawa-Mililani Park & Ride
98A	MTC	Wahiawa-Mililani Transit Center
103	PWX	Paiwa-Waikele Express
234	KMWN	Kahala Mall-Waialae Nui
235	KMWI	Kahala Mall-Waialae Iki

Route No.	Initial	PEARL CITY DIVISION (50) ROUTE NAME
A	CXA	City Express! A
C	CXC	Country Express! C
E	CXE	Country Express! E
PH1	WCPH	Waianae Coast-Pearl Harbor Express
PH2	MTPH	Mililani Town Pearl-Harbor Express
PH3	WHPH	Wahiawa Heights-Pearl Harbor Exp.
PH7	EBPH	Ewa Beach-Pearl Harbor
W1	WFX	Waipahu via Farrington Express
W2	WPX	Waipahu via Paiwa Express
40	HM	Honolulu-Makaha
41	KEB	Kapolei-Ewa Beach
42	EBW	Ewa Beach-Waikiki
44	WEB	Waipahu-Ewa Beach
51	HW	Honolulu-Wahiawa
52	HMH	Honolulu-Mililani-Haleiwa
53	HPP	Honolulu-Pacific Palisades
55	HKH	Honolulu-Kaneohe-Haleiwa
65	HK	Honolulu-Kahaluu
71	PN	Pearlridge-Newtown
72	SWW	Schofield-Wahiawa-Whitmore
73	LCC	Leeward Community College
76	WH	Waialua-Haleiwa
81	WX	Waipahu Express
83	WTX	Wahiawa Town Express
84	MXN	Mililani Express-North
84A	MXS	Mililani Express-South
88	KAX	Kahaluu-Ahuimanu Express
88A	NSX	North Shore Express
90	PCX	Pearl City Express
91	EBX	Ewa Beach Express
92	MCX	Makakilo City Express
93	WCXC	Waianae Coast Express-CBD
96	WGX	Waipio Gentry Express
99	WMWK	Wahiawa-Mililani-Waipahu-Kapolei
101	EGX	Ewa Gentry Express
102	VKX	Villages of Kapolei Express
401	WV	Waianae Valley
402	LH	Lualualei Homestead
403	NMW	Nanakuli-Maili-Waianae
411	MH	Makakilo Heights
413	CIP	Campbell Industrial Park
414	PMK	Palahia-Makakilo-Kapolei
415	KTCK	Kapolei Transit Center-Kalaeloa
416	KC	Kapolei Circulator
432	EWW	East-West Waipahu
433	WWSC	Waipahu-Waikele Shopping Center
434	WVP	Waipahu-Village Park
501	MM	Mililani Mauka
503	MLV	Mililani-Launani Valley
504	MS	Mililani South

Section 13: Demographic Ridership and Travel Patterns

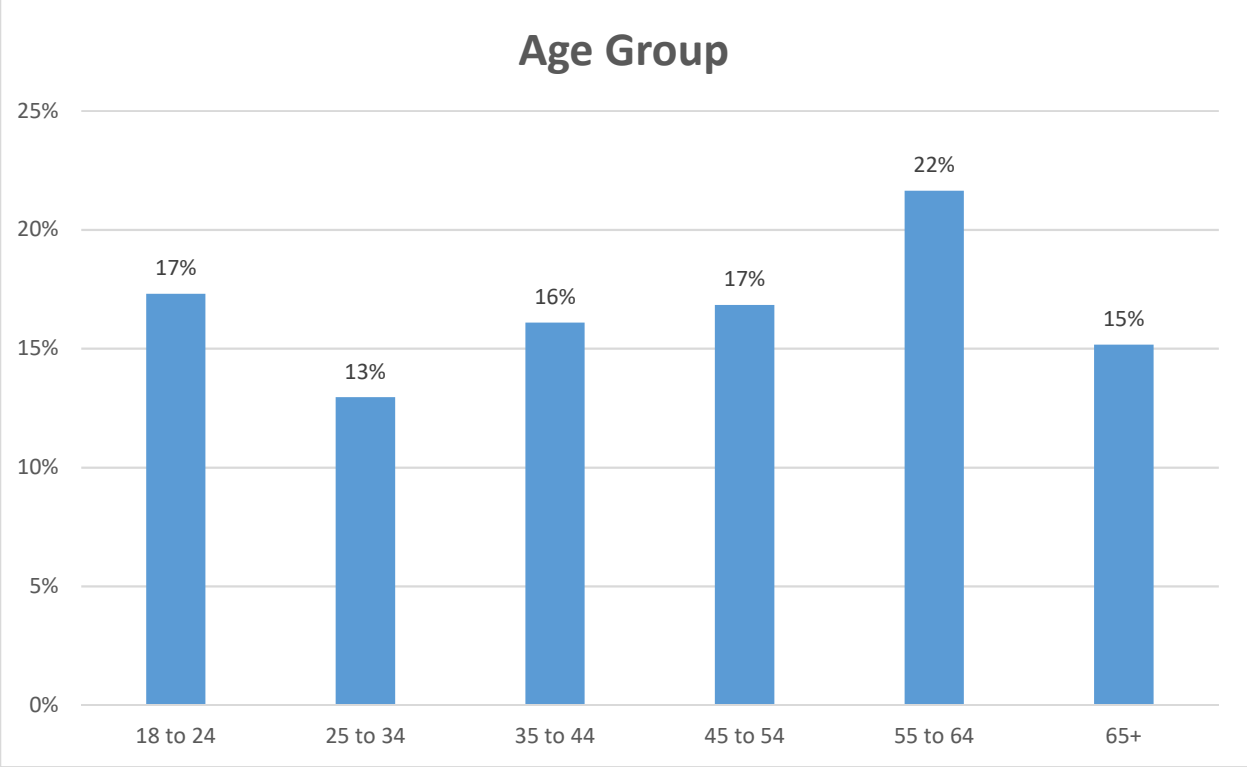
Fixed route providers shall collect information on the race, color, national origin, English proficiency, language spoken at home, household income and travel patterns of their riders using customer surveys. Transit providers shall use this information to develop a demographic profile comparing minority riders and non-minority riders, and trips taken by minority riders and non-minority riders. Demographic information shall also be collected on fare usage by fare type amongst minority users in low-income users, in order to assist with fare equity analyses.

In 2018, DTS-PTD conducted a survey to identify ridership demographics and travel patterns.

Results can be seen in Figures 3 - 19.

- Figure 3: Age
- Figure 4: Gender
- Figure 5: Ethnicity
- Figure 6: Household Size
- Figure 7: Annual Household Income
- Figure 8: Employment Status
- Figure 9: Ability to Speak English
- Figure 10: Other Languages Spoken at Home
- Figure 11: Trip Payment
- Figure 12: Days per Week Riding TheBus
- Figure 13: Purpose of Trip
- Figure 14: Alternative Method of Travel
- Figure 15: Driver’s License Status
- Figure 16: Location of Residence
- Figure 17: Trip Origination
- Figure 18: Trip Destination
- Figure 19: Resident Status

Figure 3: Age

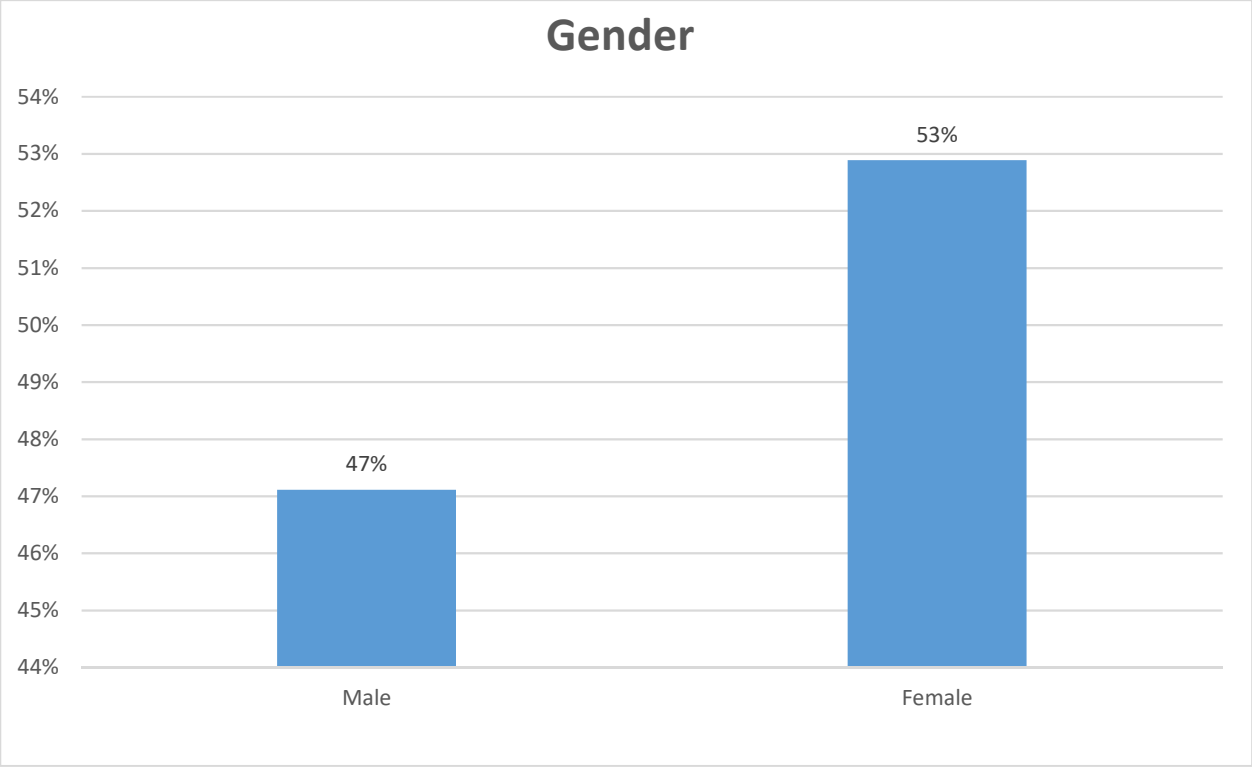


(Source: TheBus Demographic and Fare Media Ridership Survey, SMS Research, December, 2018)
(Adult usage only. SMS Research policy precludes the survey of Youth.)

Ridership shows a broad range of age groups that use the bus in Honolulu. The highest number of riders are in the 55 – 64 age range.

- 22%: 55 to 64 years old
- 17%: 18 to 24 years old
  45 to 54 years old
- 16%: 35 to 44 years old
- 15%: 65 + years old
- 13%: 25 to 34 years old

Figure 4: Gender

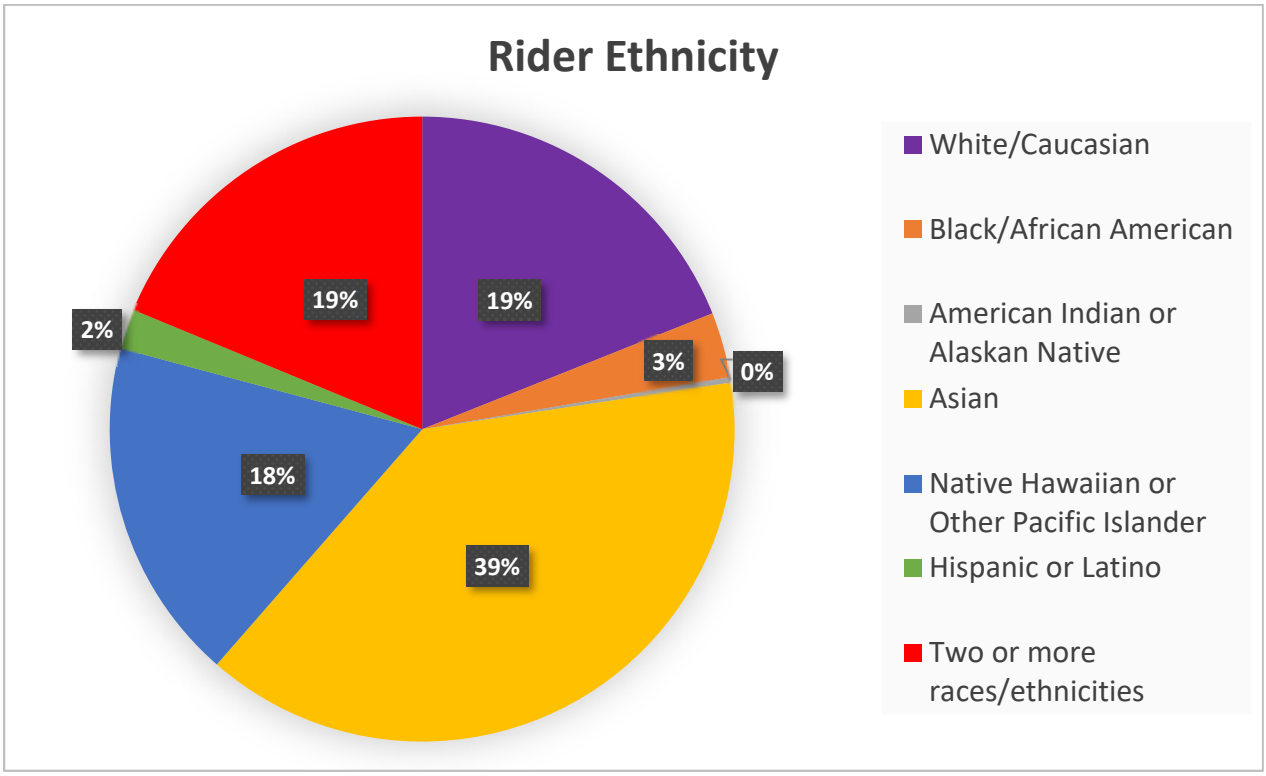


(Source: TheBus Demographic and Fare Media Ridership Survey, SMS, December, 2018)

Ridership is comparable between genders, with 6% more females then males.

- Female: 53%
- Male: 47%

Figure 5: Ethnicity

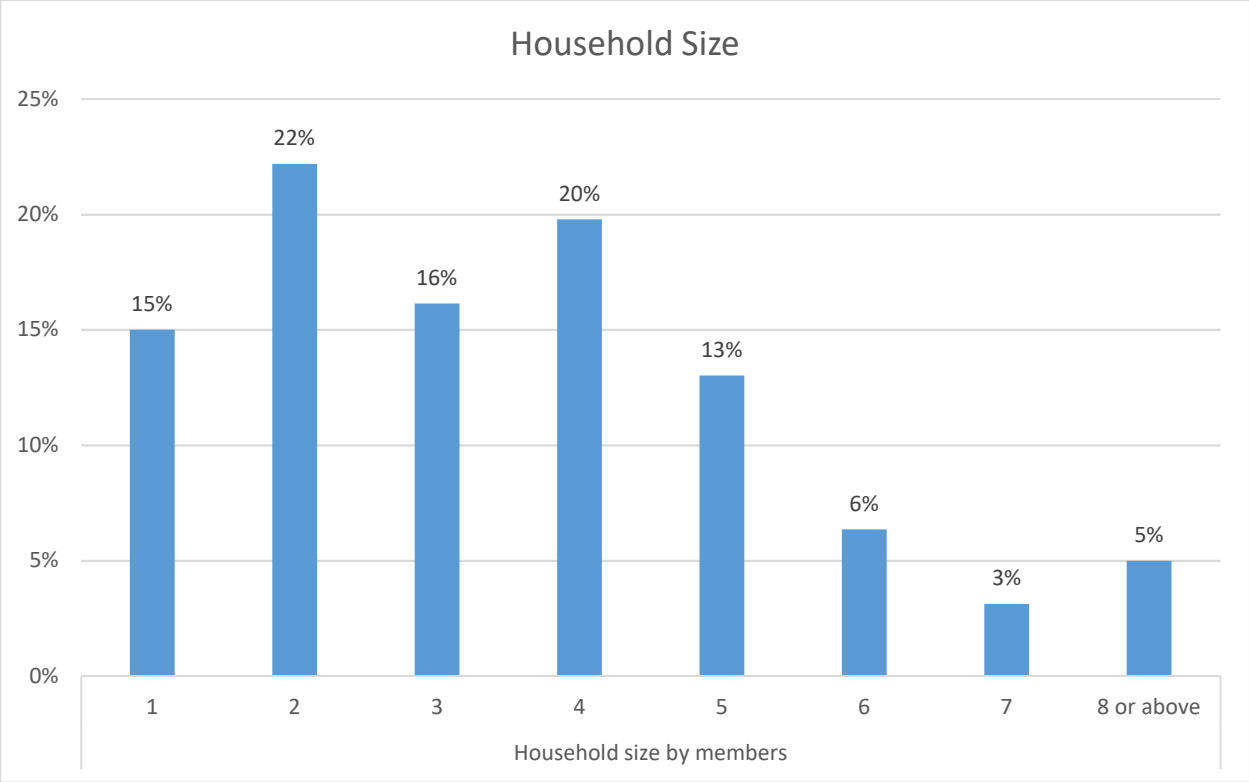


(Source: TheBus Demographic and Fare Media Ridership Survey, SMS Research, December, 2018)
*Individuals who self-identify as American Indian or Alaskan Native total 0.003%.

There is a diversity of ethnicities in Honolulu. Among ridership, the three predominant groups are Asians, Caucasians and those who have two or more ethnicities.

- 39%: Asian
- 19%: White/Caucasian
  Two or more races/ethnicities
- 18%: Native Hawaiian or Other Pacific Islander
- 3%: Black/African American
- 2%: Hispanic or Latino
- 0%: American Indian or Alaskan Native*

Figure 6: Household Size

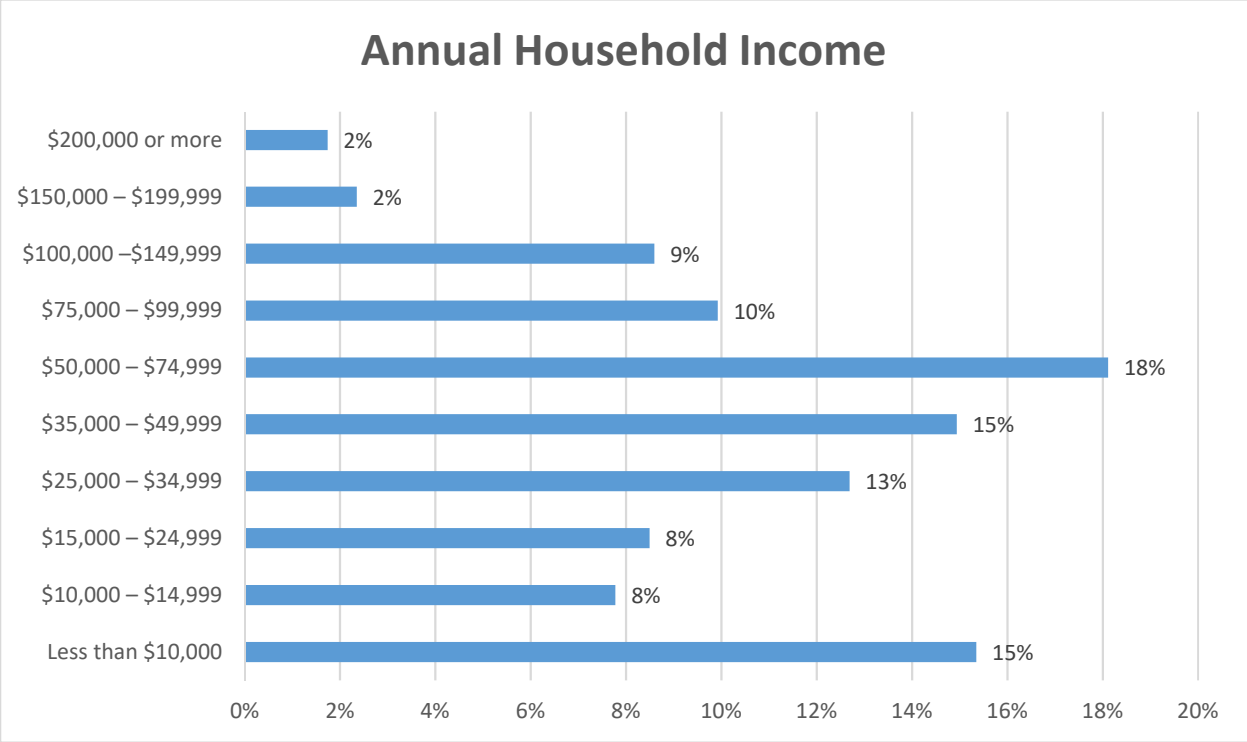


(Source: TheBus Demographic and Fare Media Ridership Survey, SMS Research, December, 2018)

The household of the average bus rider is generally comprised of two to four members.

- 22%: 2 household members
- 20%: 4 household members
- 16%: 3 household members
- 14%: 1 household members
- 13%: 5 household members
- 6%: 6 household members
- 5%: 8 or more household members
- 3%: 7 household members

Figure 7: Annual Household Income

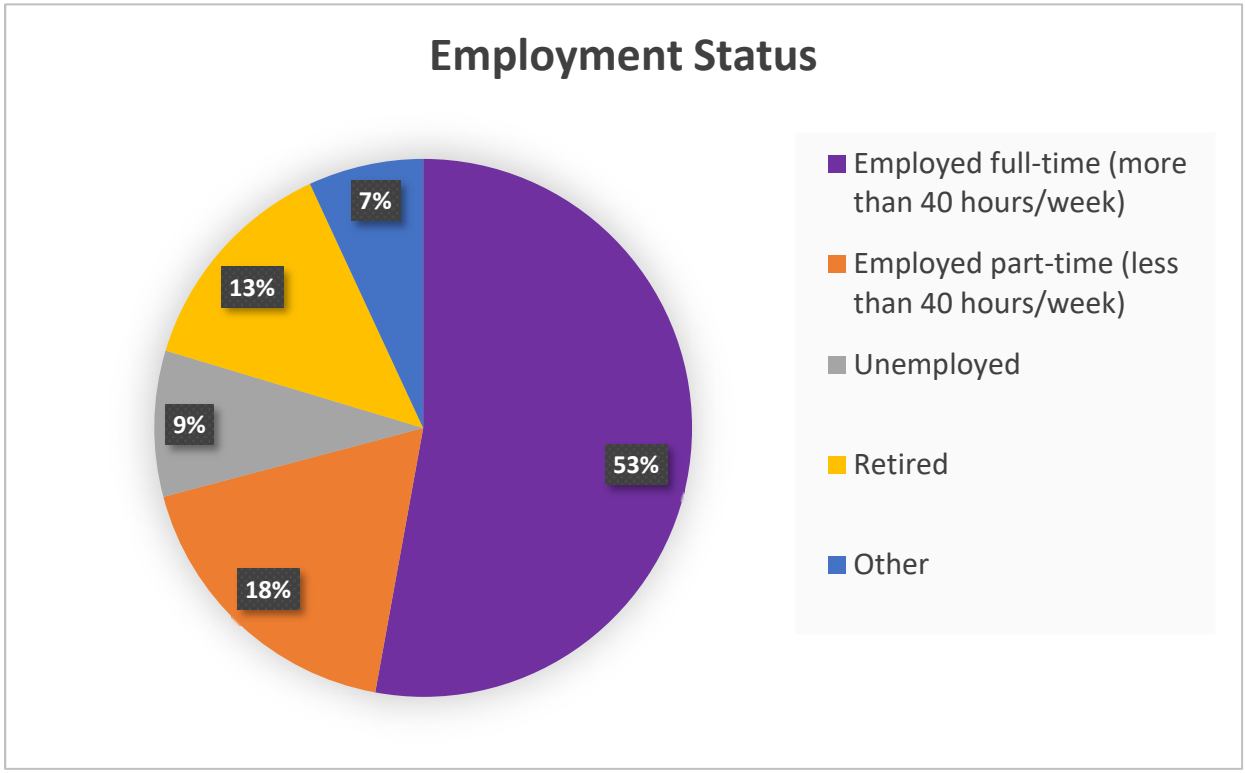


(Source: TheBus Demographic and Fare Media Ridership Survey, SMS Research, December, 2018)

A majority of bus riders belong in the middle income group while the next highest group of riders belong in the lower income group.

- 18%: $50,000 - $74,999
- 15%: $35,000 - $49,999
  Less than $10,000
- 13%: $25,000 - $34,999
- 10%: $75,000 - $99,999
- 9%: $100,000 - $149,999
- 8%: $15,000 - $24,999
  $10,000 - $14,999
- 2%: $150,000 - $199,999
  $200,000 or more

Figure 8: Employment Status

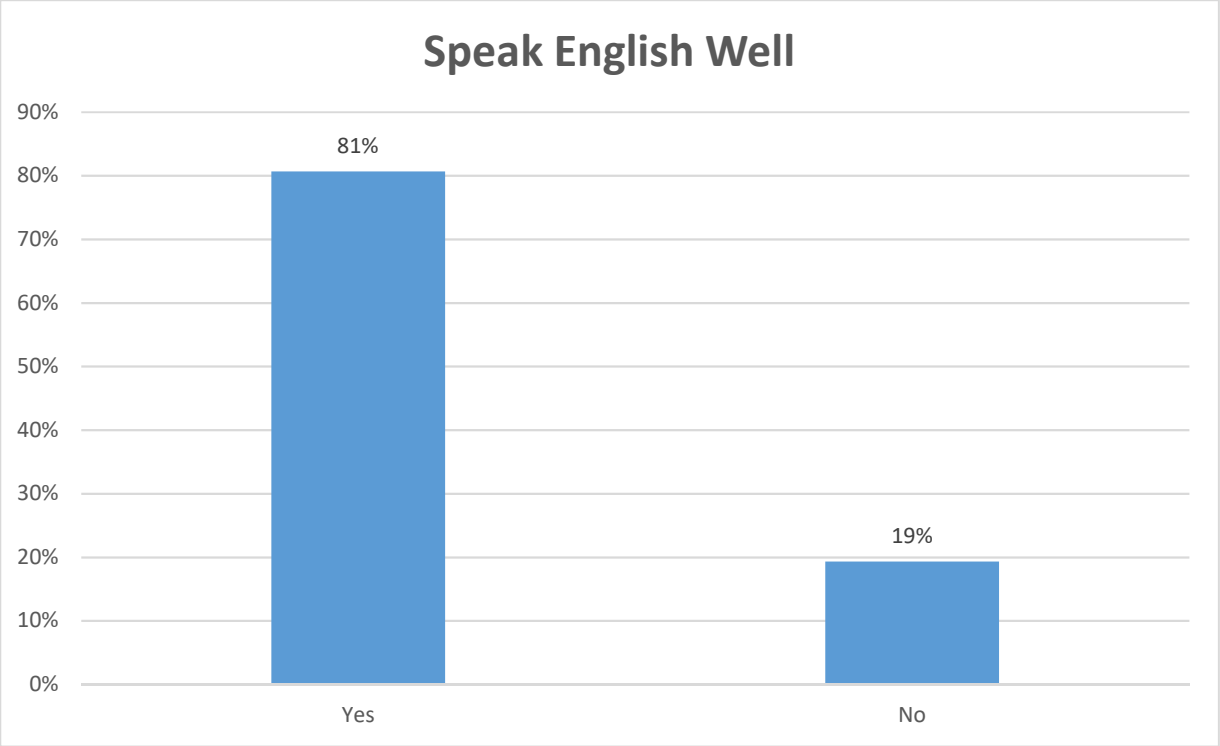


(Source: TheBus Demographic and Fare Media Ridership Survey, SMS Research, December, 2018)

A majority of bus riders are full-time employees who depend on the bus as their main mode of transportation.

- 53%: Employed full-time (more than 40 hours/week)
- 18%: Employed part-time (less than 40 hours/week)
- 13%: Retired
- 9%: Unemployed
- 7%: Other

Figure 9: Ability to Speak English

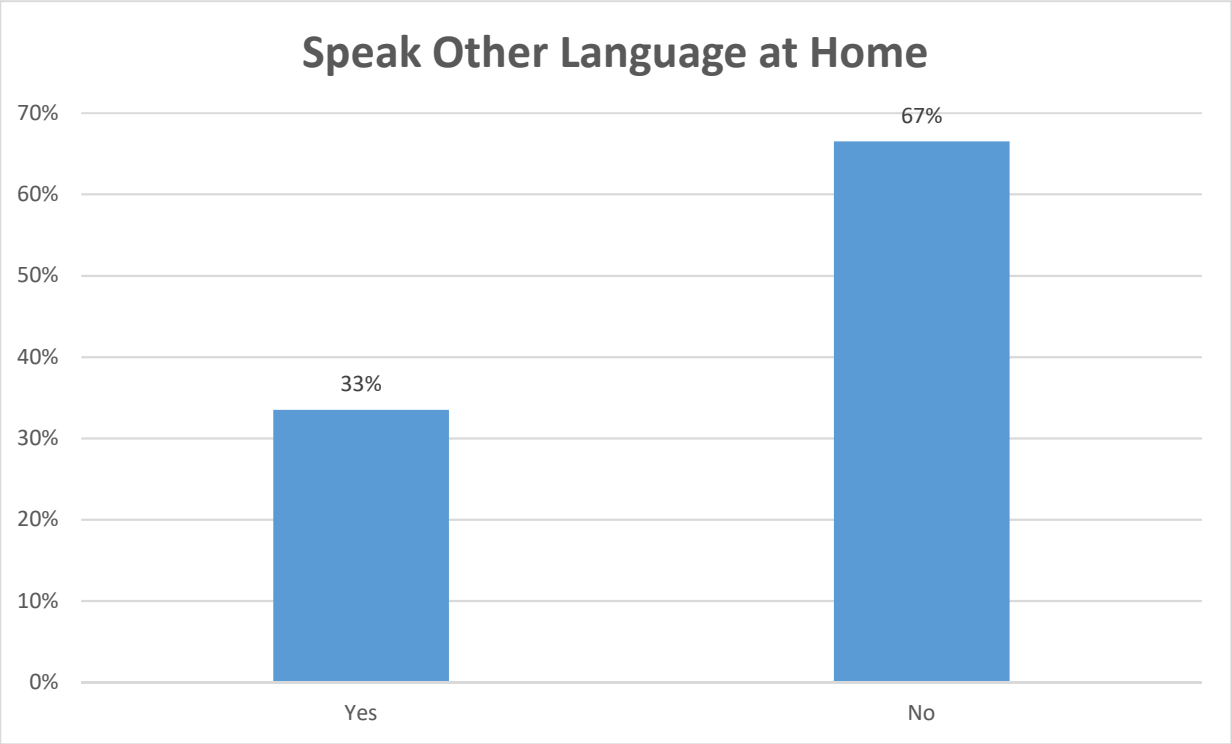


(Source: TheBus Demographic and Fare Media Ridership Survey, SMS Research, December, 2018)

Most riders speak English well despite Hawaii's diverse ethnicities.

- Yes: 81%
- No: 19%

Figure 10: Other Languages Spoken at Home

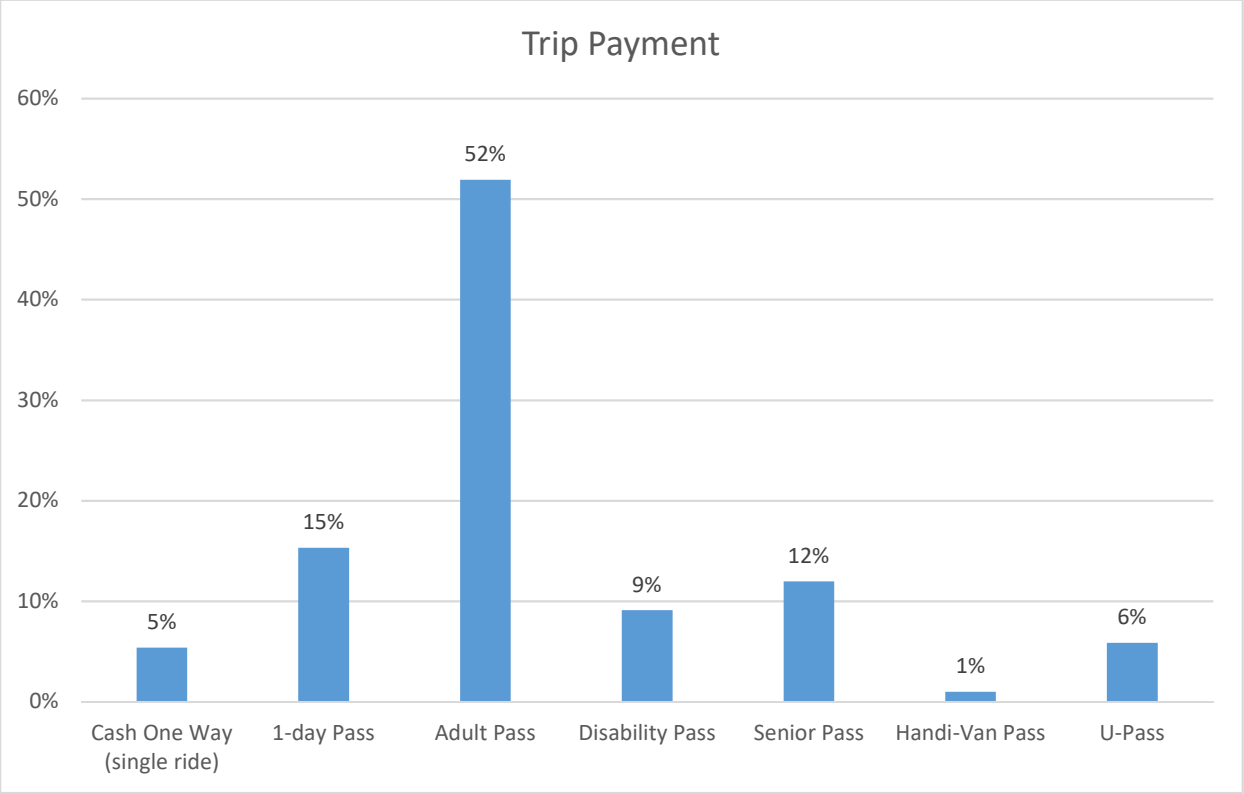


(Source: TheBus Demographic and Fare Media Ridership Survey, SMS Research, December, 2018)

A third of the ridership self-identified as speaking a language other than English at home.

- No: 67%
- Yes: 33%

Figure 11: Trip Payment

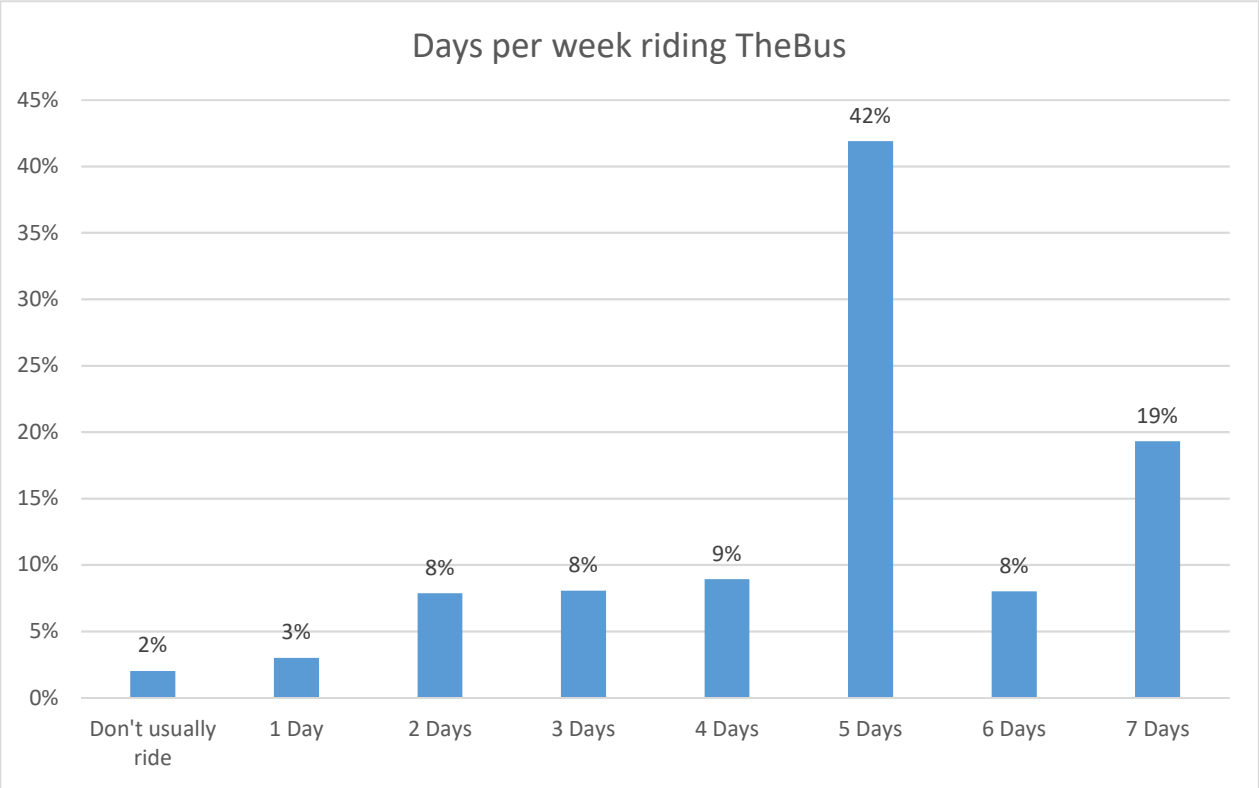


(Source: TheBus Demographic and Fare Media Ridership Survey, SMS Research, December, 2018)

Approximately half of the ridership uses the Adult Monthly Bus Pass to ride the bus.

- 52%: Adult Monthly Pass
- 15%: 1-day Pass
- 12%: Senior Pass
- 9%: Disability Pass
- 6%: U Pass
- 5%: Cash One Way (single ride)
- 1%: Handi-Van Pass

Figure 12: Days per Week Riding TheBus

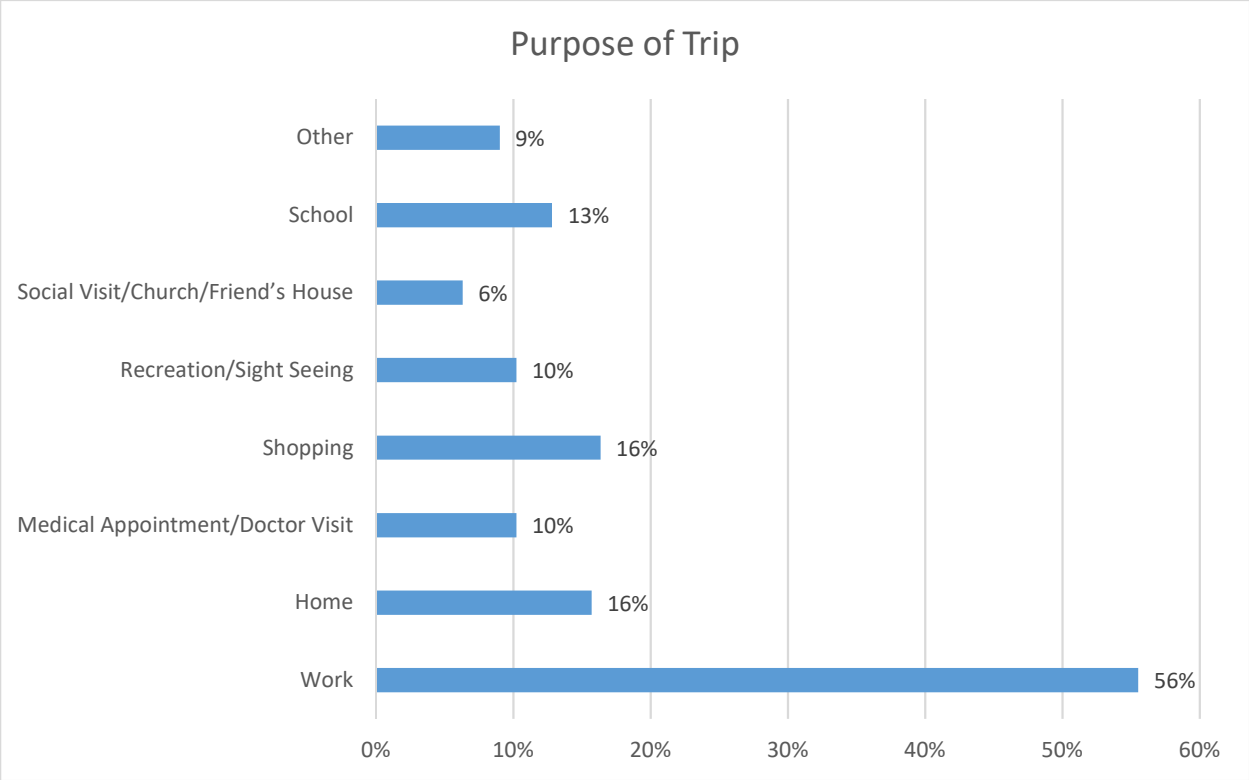


(Source: TheBus Demographic and Fare Media Ridership Survey, SMS Research, December, 2018)

42% of riders ride the bus 5 times a week. This correlates to Figure 8 data that 53% of riders are full-time employees, Figure 11 data that 52% of riders use the Adult bus pass, and Figure 13 data that 56% of riders use the bus for work purposes.

- 42%: 5 Days
- 19%: 7 Days
- 9%: 6 Days
  4 Days
- 8%: 3 Days
  2 Days
- 3%: 1 Days

Figure 13: Purpose of Trip

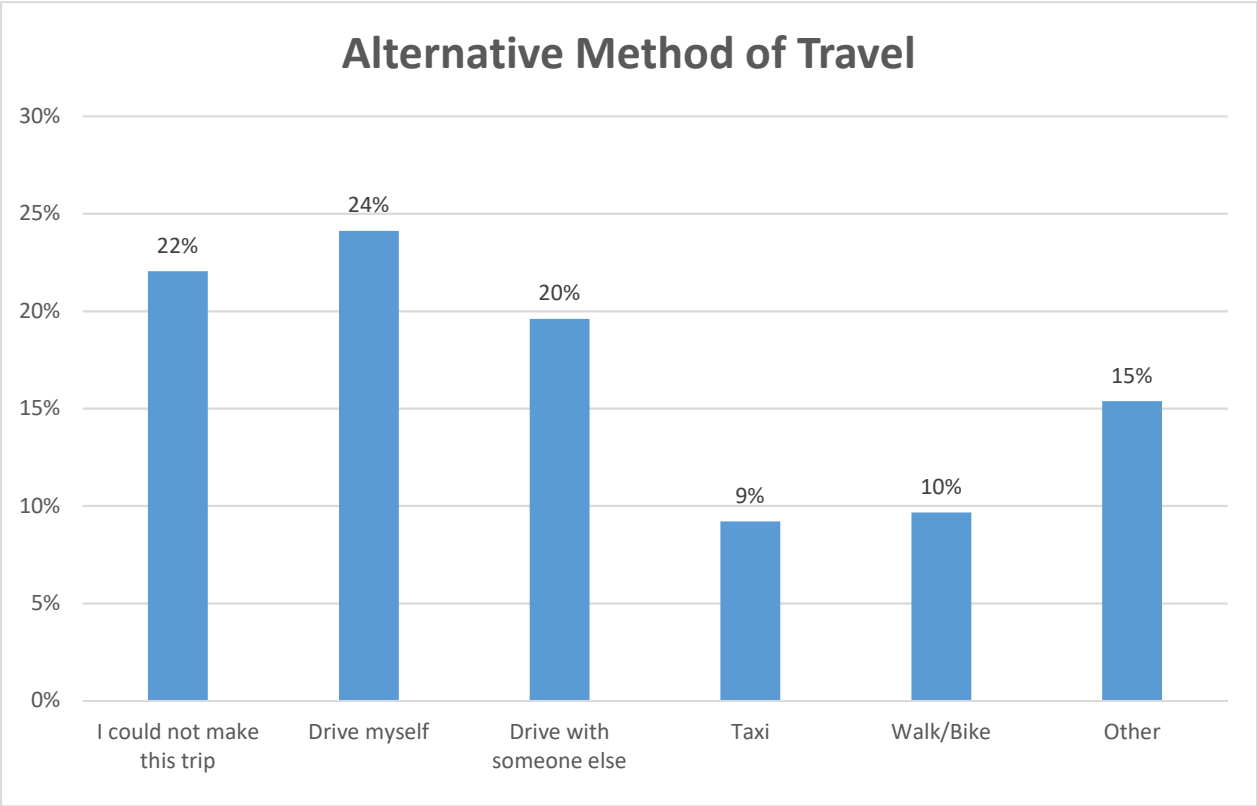


(Source: TheBus Demographic and Fare Media Ridership Survey, SMS Research, December, 2018)
*Total exceeds 100% because many riders utilize the bus for many purposes in a single trip.

A majority of bus riders utilize the bus for work purposes. Based on the previous charts, it appears that full-time employees use the bus five days a week as their main mode of transportation to and from work. Therefore, these full-time employee riders would purchase an Adult Monthly Bus Pass as an affordable means to travel.

- 56%: Work
- 16%: Shopping
  Home
- 13%: School
- 10%: Recreation/Site Seeing
  Medical Appointment/Doctor Visit
- 6%: Social Visit/Church/Friend's House
- 9%: Other

Figure 14: Alternative Method of Travel

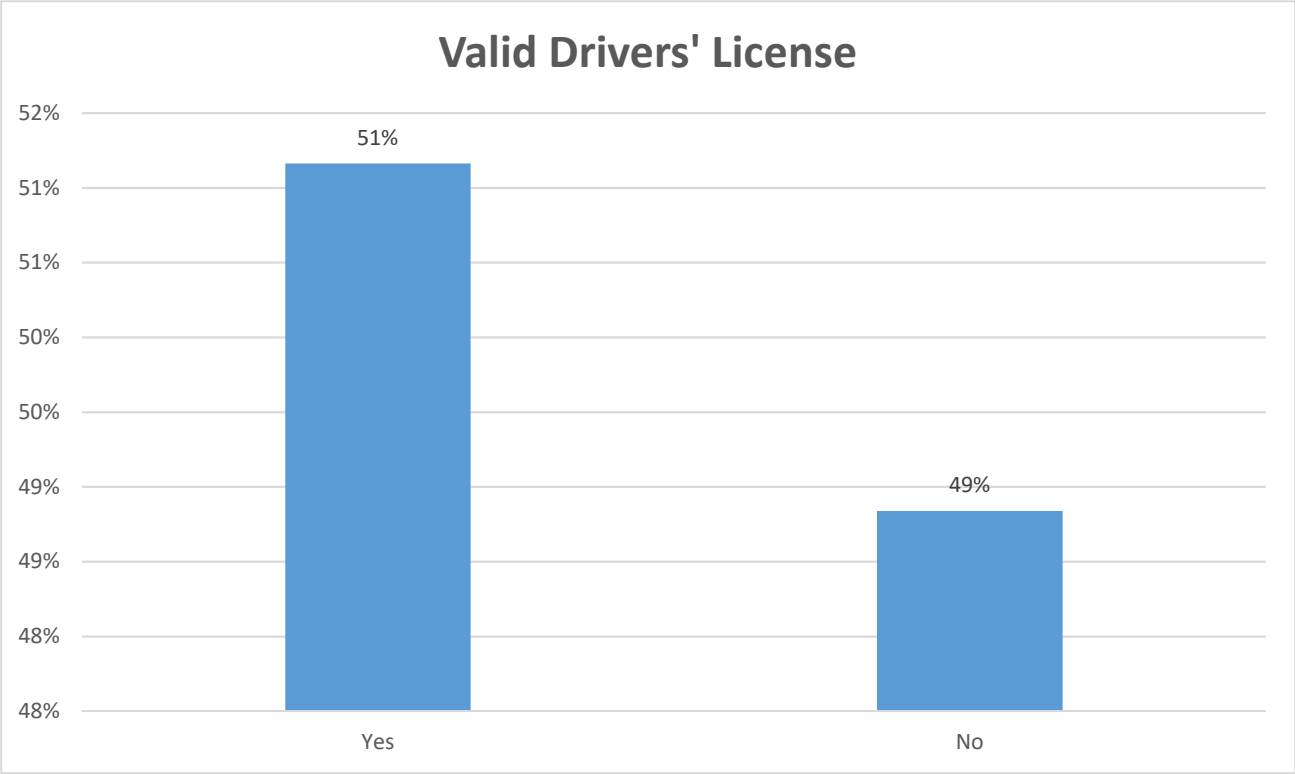


(Source: TheBus Demographic and Fare Media Ridership Survey, SMS Research, December, 2018)

22% of riders rely solely on the bus for transportation and do not have other alternatives if bus service is not available.

- 24%: Drive myself
- 22%: I could not make this trip
- 20%: Drive with someone else
- 15%: Other
- 10%: Walk/Bike
- 9%: Taxi

Figure 15: Driver's License Status

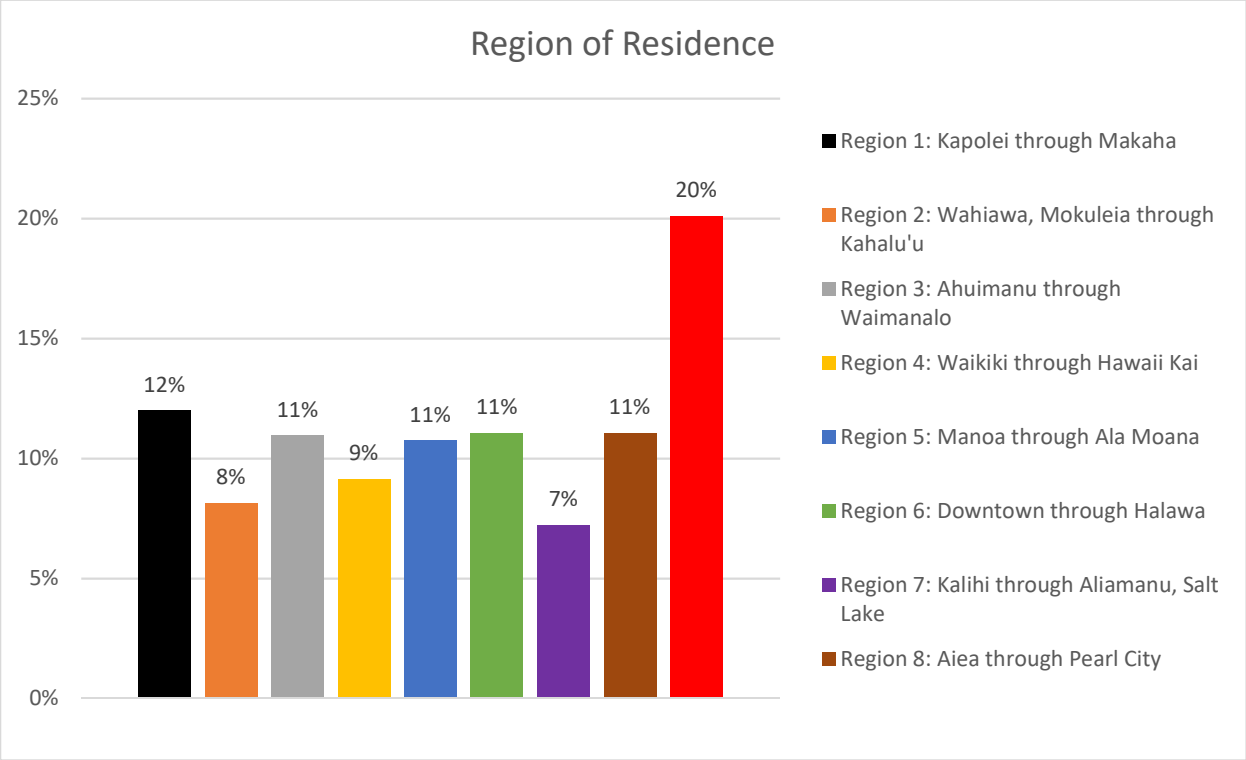


(Source: TheBus Demographic and Fare Media Ridership Survey, SMS Research, December, 2018)

Approximately half of TheBus ridership possesses a valid driver's license.

- Driver's License: 51%
- No Driver's License: 49%

Figure 16: Location of Residence

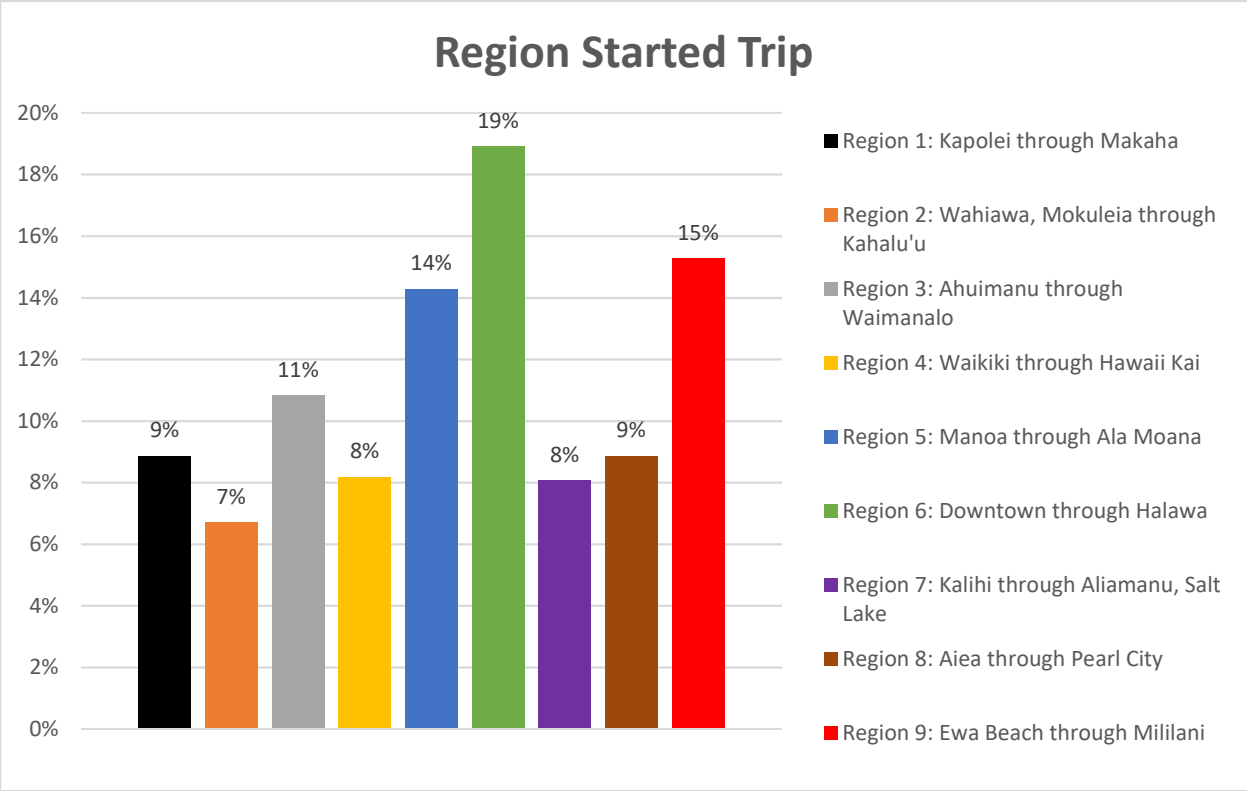


(Source: TheBus Demographic and Fare Media Ridership Survey, SMS Research, December, 2018)

Majority of bus riders live in the Ewa Beach through Mililani area. The bus also services a fair amount riders from every region throughout Oahu.

- 20%: Region 9: Ewa Beach through Mililani
- 12%: Region 1: Kapolei through Makaha
- 11%: Region 3: Ahuimanu through Waimanalo
  Region 5: Manoa through Ala Moana
  Region 6: Downtown through Halawa
  Region 8: Aiea through Pearl City
- 9%: Region 4: Waikiki through Hawaii Kai
- 8%: Region 2: Wahiawa, Mokuleia through Kahaluu
- 7%: Region 7: Kalihi through Aliamanu, Salt Lake

Figure 17: Trip Origination

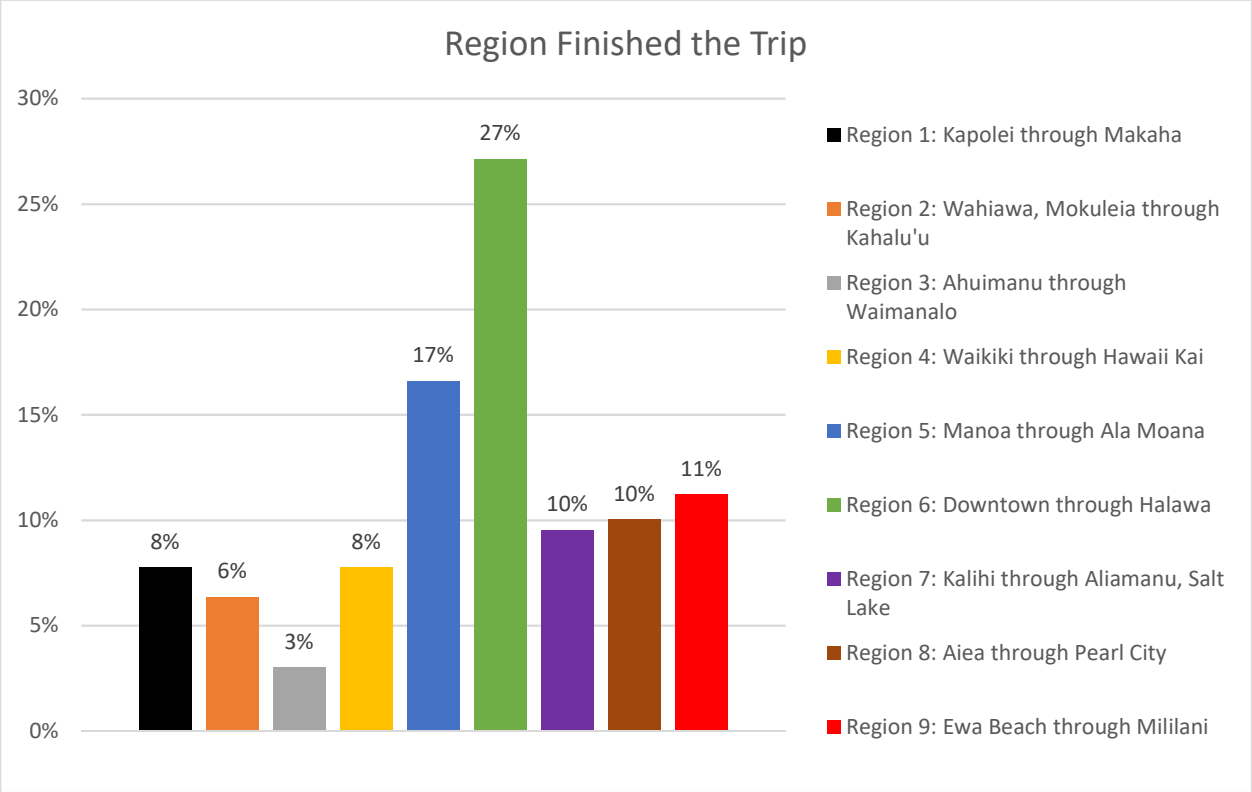


(Source: TheBus Demographic and Fare Media Ridership Survey, SMS Research, December, 2018)

Most trips originate in the Downtown to Halawa region which did not correlate to the Ewa Beach to Mililani region where most rider's resided.

- 19%: Region 6: Downtown through Halawa
- 15%: Region 9: Ewa Beach through Mililani
- 14%: Region 5: Manoa through Ala Moana
- 11%: Region 3: Ahuimanu through Waimanalo
- 9%: Region 1: Kapolei through Makaha
  Region 8: Aiea through Pearl City
- 8%: Region 4: Waikiki through Hawaii Kai
  Region 7: Kalihi through Aliamanu, Salt Lake
- 7%:` Region 2: Wahiawa, Mokuleia through Kahaluu

Figure 18: Trip Destination

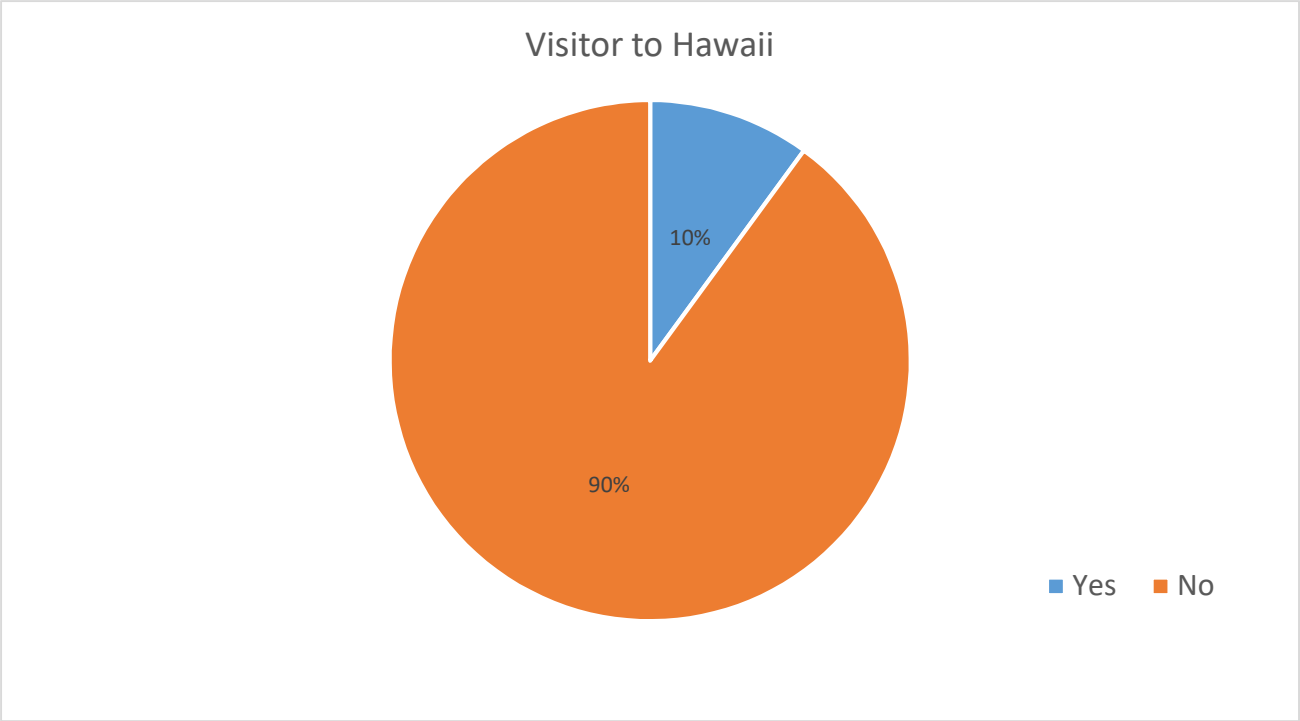


(Source: TheBus Demographic and Fare Media Ridership Survey, SMS Research, December, 2018)

The final destination for a majority of bus riders is the Primary Urban Core (Downtown to Halawa & Manoa to Ala Moana) where a majority of jobs are located. This corresponds with previous charts showing that most riders are employed full-time and use the bus to travel to and from work 5 days a week.

- 27%: Region 6: Downtown through Halawa
- 17%: Region 5: Manoa through Ala Moana
- 11%: Region 9: Ewa Beach through Mililani
- 10%: Region 7: Kalihi through Aliamanu, Salt Lake
  Region 8: Aiea through Pearl City
- 8%: Region 1: Kapolei through Makaha
  Region 4: Waikiki through Hawaii Kai
- 6%: Region 2: Wahiawa, Mokuleia through Kahaluu
- 3%: Region 3: Ahuimanu through Waimanalo

Figure 19: Resident Status



(Source: TheBus Demographic and Fare Media Ridership Survey, SMS Research, December, 2018)

The bus is mainly utilized by Hawaii residents with visitors comprising just 10% of ridership.

- Resident: 90%
- Visitor: 10%

Section 14: Requirement to Monitor Transit Service

In order to ensure compliance with DOT's Title VI regulations, FTA requires transit agencies to monitor the performance of their transit system relative to their system-wide service standards and service policies (i.e. vehicle load, vehicle assignment, transit amenities, etc.) no less than every three years. Agencies shall submit the results of the monitoring program as well as documentation (e.g., a resolution, copy of meeting minutes, or similar documentation) to verify the Board's consideration, awareness, and approval of the monitoring results to the FTA every three years as part of the Title VI Program.

The System-wide Service Standards & Policies Monitoring Report was compiled using 2018 data. (Attachment 7)

Findings

The results of TheBus service performance for all 104 routes are summarized below and indicate that for the most part, public transit services are provided in comparable and nondiscriminatory manner to TVI/EJ and non TVI/EJ populations. While the results also confirm problems with on-time performance and headway, it is a system-wide issue for a majority of the routes and does not disproportionately affect TVI/EJ routes.

The discrepancies identified in this report are currently being addressed and require additional monitoring and further analysis to redistribute service and/or implement other mitigation measures that align with current budget constraints.

System-wide Service Standards:

- Vehicle Load: Generally, all but 6 routes met the 10% standard for the percentage of annual passenger miles exceeding the vehicle load factor standard. DTS will evaluate the 3 non-TVI/EJ and 3 TVI/EJ routes to address overcrowding.

- Vehicle Headway: Generally, most routes do not meet the vehicle headway standard for 2 or more periods. DTS will evaluate non-conforming scheduled headways and adjust accordingly to ensure that all routes are in general conformance to the vehicle headway standard.

- On-time performance: Generally, most routes do not meet the on-time performance standard. DTS will evaluate non-conforming routes with additional analysis/monitoring to identify factors affecting on-time performance for mitigation purposes. Such factors include various external causes such as: traffic congestion, traffic accidents, and road/lane closures attributable to construction projects/road resurfacing or rehabilitation/rail construction; and are difficult to mitigate.

- Service availability: The standard was met for TVI/EJ and non-TVI/EJ populations.

Service Policies:

- Transit amenities: Generally, all TVI/EJ routes have higher distribution percentages of amenities at bus stops.

- Vehicle assignment: Generally all TVI/EJ and non-TVI/EJ routes are assigned vehicles comparable in age with TVI/EJ route vehicles ranging between 2 – 3 years newer than the non-TVI/EJ route vehicles assigned for each mode.

Section 15: Requirement to Evaluate Service and Fare Changes

In order to ensure compliance with DOT's Title VI regulations, FTA requires transit agencies to develop written procedures to evaluate, prior to implementation, any and all service changes that exceed the transit provider's major service change threshold, as well as all fare changes, to determine whether those changes will have a discriminatory impact based on race, color, or national origin. The written procedures and results of service and/or fare equity analyses shall be included in the transit provider's Title VI Program as well as documentation (e.g., a resolution, copy of meeting minutes, or similar documentation) to verify the Board's consideration, awareness, and approval of the analysis results to the FTA every three years as part of the Title VI Program.

DTS-PTD's Major Service and Fare Change Policy can be found at attachment 8.

DTS-PTD's service and fare equity analyses are contained in Attachment 9.

- Routes 72 & 98A
- 1 Day Pass
- 2018 Fare Increase
- Windward Express Routes
- HOLO Card

Attachment 1

Complaint Form

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

COMPLAINT FORM

Information/Instruction

The City and County of Honolulu, Department of Transportation Services, and Oahu Transit Services are committed to ensuring that no person is discriminated against while using TheBus or TheHandi-Van services as prohibited by **Title VI, Civil Rights Act, 1964**. "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."

Please provide the following information necessary in order to process your complaint. Assistance is available upon request, TheBus 768-8374 and TheHandi-Van 768-8300. Complete this form and mail or deliver to: City and County of Honolulu, Department of Transportation Services, Public Transit Division, 650 South King Street, 3rd Floor, Honolulu, HI 96813.

Section I		
Name:		
Address:		
Telephone (Home):	Telephone (Work):	
Electronic Mail Address:		
Accessible Format Requirements?	[ ] Large Print	[ ] Audio Tape
	[ ] TDD	Other:

Section II		
Are you filing this complaint on your own behalf?	[ ] Yes*	[ ] No
*If you answered "yes" to this question, go to Section III.		
If not, please supply the name and relationship of the person for whom you are complaining:		
Please explain why you have filed for a third party:		
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	[ ] Yes	[ ] No

Section III

I believe the discrimination I experienced was based on (check all that apply):
[ ] Race [ ] Color [ ] National Origin

Date of Alleged Discrimination (Month, Day, Year): _____

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as

names and contact information of any witnesses. If more space is needed, please use additional sheets. _____ _____ _____		
Section IV		
Have you previously filed a complaint with this agency?	[ ] Yes	[ ] No
Section V		
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? [ ] Yes [ ] No If yes, check all that apply: [ ] Federal Agency: _____ [ ] Federal Court: _____ [ ] State Agency: _____ [ ] State Court: _____ [ ] Local Agency: _____		
Please provide information about a contact person at the agency/court where the complaint was filed.		
Name:		
Title:	Telephone:	
Agency:		
Address:		
Section VI		
Name of agency complaint is against:		
Contact person:		
Title:	Telephone:	

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

_____ _____

Signature Date

Attachment 2

Public Participation Plan

CATEGORY: ADMINISTRATION	Index Code: 7-1.19 Page 1 of 6

SUBJECT: Public Participation for Changes in Public Transit Policies, Programs, Projects, Service, and Operations

REFERENCE: FTA C 4702.1B, Title VI Requirements & Guidelines for Federal Transit Administration (FTA) Recipients (or current version); Comprehensive Review Guide for Triennial and State Management Reviews (current FY)

PURPOSE: To establish policies and procedures when planning and implementing changes in public transit policies, programs, projects, plans, services and operations (collectively referred to as "Changes"); and to identify methods for early, inclusive, and continuous public participation when informing the public of proposed plans or advising the public of implementation of proposed "Changes". Public participation policies and engagement activities are applicable to all subrecipients, contractors, and lessees.

POLICIES: PTD shall:

- Effectively engage all stakeholders, including but not limited to minority, low income, limited English proficient (LEP), and disabled populations, in public participation activities.
- Ensure that public information and participation are provided as early as may be feasible and in a nondiscriminatory manner.
- Promote full and fair participation in the public transit decision-making process for all potentially affected communities without regard to race, color or national origin.
- Ensure meaningful access to public transit-related programs, plans, activities, and information by minority, low income, LEP, and disabled populations.
- Evaluate and determine the most effective method(s) for informing and involving the public during the planning/decision-making process and implementation phase.

DEFINITIONS: For the purposes of this section:

1. "Changes" include but are not limited to the following:
    - Policies affecting service, operations, programs.
    - Service levels affecting headway, frequency, availability, coverage area, hours, miles, span of service, hours of operation.
    - Fare policy, pricing, and media.
    - Service additions, extensions, or removals whether temporary or not.
    - Establishing, relocating, or removing bus stops.
    - Programs, plans, or projects affecting communities or ridership.

SUBJECT: Public Participation for Changes in Public Transit Policies, Programs, Projects, Service, and Operations

2. PTD will evaluate and designate "Changes" as major or minor. Major changes will generally affect system-wide/regional populations and significantly impact service usage by the established ridership in a large service area, and includes major service changes defined in Standard Operating Procedure No. 7-1.13 "DTS Major Service & Fare Change Policy and Disparate Impact & Disproportionate Burden Policies". Minor changes will generally affect operations or service over a smaller, specific area, community, or neighborhood, and have minimal impact to service usage by the established ridership.

3. Fixed Route ridership is defined as unlinked passenger trips and Paratransit ridership is defined as "active paratransit riders" who are currently eligible to use the City's special transit service, TheHandi-Van, and who have taken at least two (2) one-way trips in the past two (2) years.

4. Suspended, altered, or special services instituted during emergency situations shall be exempt from these procedures.

PROCEDURES:

1. **Public Information and Solicitation of Public Comment.**
   During the planning phase, the public/ridership shall be informed of proposed major changes and their feedback and comments shall be solicited using the following method(s). The public comment period shall continue for sixty (60) days or more, as appropriate and feasible.

   Neighborhood Boards
   Neighborhood Boards, the City's mechanism to ensure and involve public participation in the decision-making process of government that affects communities, will be notified of proposals affecting their neighborhoods.
   - During the planning phase, information of proposed major changes will be transmitted to the Neighborhood Board Chair, fifteen (15) days or more, prior to the scheduled monthly meeting date and prior to the start of the public comment period, as appropriate and feasible.
   - Presentations will be made upon request by the Neighborhood Board Chair.
   - Information transmitted to the Neighborhood Board Chair will include the Mayor's Neighborhood Board Representative.
   - Brochures, flyers, pamphlets, or other handouts will be provided to the Mayor's Neighborhood Board Representative for distribution at Neighborhood Board meetings.

Public Information Meetings

Public information meetings are another method to inform the public and solicit comments for inclusive public participation of proposed major changes, as appropriate and feasible.

- The ridership (fixed route or paratransit) and/or the public will be notified of the public information meeting, fifteen (15) days or more, prior to the scheduled meeting date and start of the public comment period.
- Public information meetings may be scheduled for minor changes, as appropriate and feasible.

Public Hearing

During the planning phase, as appropriate and feasible, a public hearing may be convened when considering proposed major changes involving a large service area(s) or a comprehensive/complex issue(s). All public hearings shall be conducted in accordance with Hawaii Revised Statutes, Chapter 91, including:

- Publishing public notices in a publication of general circulation, thirty (30) days or more, prior to the public hearing and start of the public comment period, that describe the proposed major changes, and the time and place of the public hearing.
- Have copies of the published notice and minutes of the public hearing available for public inspection.

Community/Business Organizations

Upon request during the planning phase, PTD will make informational presentations regarding proposed major changes to affected community/business organizations, either separately or in conjunction with presentations at Neighborhood Boards or at public information meetings, as appropriate and feasible.

Community Events

Upon request during the planning phase, PTD will participate in existing community events and be present to provide informational material, answer questions, and solicit comments regarding proposed major changes. Informational materials may include fliers, brochures, and surveys containing maps, charts, illustrations, photographs, table-top displays, and other graphics, as appropriate and feasible.

SUBJECT: Public Participation for Changes in Public Transit Policies, Programs, Projects, Service, and Operations

Public Transit Ridership (fixed route or paratransit)
During the planning phase:

- Information to inform and solicit feedback for proposed major changes from the affected ridership will be posted at transit facilities, bus stops, on-board transit vehicles through mail-outs, and on DTS/OTS websites, as appropriate and feasible, prior to the start of the public comment period.
- For in-person communication to inform and solicit feedback for proposed major changes from the affected ridership, PTD will distribute informational material/surveys at transit facilities, major bus stops, and on-board transit vehicles, as appropriate and feasible, prior to the start of the public comment period.
- This section may apply to proposed minor changes, as appropriate and feasible.

Surveys
Surveys will be conducted during the planning phase for proposed major changes and may be conducted for proposed minor changes. Survey methods include but are not limited to:

- Survey Monkey conducted online.
- Printed or verbal survey conducted in-person or distributed at transit facilities, bus stops, and on-board transit vehicles.
- Printed survey distributed at meetings and through the mail.
- All surveys will include a designated survey phone line.

2. Advance Notification for Implementation of Changes.
Advance notification for implementation of major changes proposed in the planning phase and other changes to service or operations that impact the established ridership and its habits/usage of public transit includes, but is not limited to the following methods, with a goal of as much advance notice as practical.

The content of all notices will include relevant information, such as description of changes, dates, maps, other graphics, and contact information for public comment and inquiry (phone number and email/office address).

Neighborhood Boards
Notice will be provided to affected Neighborhood Boards, fifteen (15) days or more, prior to the implementation date and the scheduled monthly meeting, as appropriate and feasible.

- Presentations will be made upon request by the Neighborhood Board Chair.
- Information transmitted to the Neighborhood Board Chair will also be provided to the Mayor's Neighborhood Board Representative.
- Rider alerts or other handouts will be provided to the Mayor's Neighborhood Board Representative for distribution at Neighborhood Board meetings.

City Council
Notice will be provided to Councilmembers representing the affected City Council District, fifteen (15) days or more, prior to the implementation date, as appropriate and feasible.

Posted Notices, Car Cards
Notices will be posted at relevant locations; such as transit facilities, bus stops, on-board transit vehicles; fifteen (15) days or more, prior to the implementation date, as appropriate and feasible.

Fliers, Pamphlets, Brochures
Notices will be distributed, fifteen (15) days or more, prior to the implementation date, as appropriate and feasible.

- Distribution on-board transit vehicles.
- Distribution at transit facilities, bus stops.
- Mailings to ridership, residents, businesses, organizations, agencies.

Website Notice
Notices will be posted on the OTS and DTS websites, fifteen (15) days or more, prior to the implementation date, as appropriate and feasible.

Press Release
For media release to the public via newspaper, radio, and television; one (1) day or more, prior to the implementation date, as appropriate and feasible.

Purchased Advertising
Notice will be published in a publication of general circulation and/or publications targeted to specific areas, organizations, or groups, seven (7) days or more, prior to the implementation date, as appropriate and feasible.

3. **Engaging Minority, Low-income, LEP, and Disabled Populations.**
Staff shall engage and consider the needs and input of minority, low income, LEP, and disabled populations (MLLD) by providing opportunities for meaningful participation, regardless of race, color or national origin,

disabilities, or language barriers. Practices will include, but not limited to the following:

- Provide reasonable or special accommodations based on the need, as appropriate and feasible, for example, interpreters or screen reader format for persons with low vision.
- Conduct meetings at varied times of day and locations that are convenient and accessible to encourage participation.
- Train staff to be alert to and anticipate the needs of LEP participants at meetings and workshops.
- Make available different meeting sizes and formats upon request.
- Network/coordinate with community-based organizations, social service agencies, and other community groups to specifically reach out to MLLD members and distribute information.
- Have vital documents translated in identified languages and available on request.
- Include information on meeting notices on how to request special assistance.

4. Record of Public Participation for Proposed Changes

Documentation of public participation and a record of solicited comments, include but are not limited to the following:

- Correspondence (i.e. letters, email)
- Meeting agendas and minutes (i.e. Neighborhood Board, Community Association)
- Public Hearing meeting minutes
- Telephone call log
- Memos for the file (Walk-in, telephone)

ADOPTED:

WES FRYSZTACKI

Amendment 2

Date 4.2.2019

Attachment 3

2019 Limited English Proficient Plan
(LEP Plan)

City and County of Honolulu
Department of Transportation Services
Public Transit Division

2019
Limited English Proficient Plan
(LEP Plan)

Contents

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II. Definition of a Limited English Proficient Person **2**
III. Elements of the Plan for Limited English Proficient Persons **2**
- **a. Four Factor Analysis Results** **2**
- **b. Language Assistance Services** **6**
- **c. Providing Notice to LEP Persons of Language Assistance** **7**
- **d. Monitoring and Updating the LEP Plan** **8**
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Table 2: Other Languages **4**
Table 3: Public Transit LEP Ridership **4**

I. Introduction

The Department of Transportation Services (DTS) of the City and County of Honolulu and its contracted operator of public transit services, O'ahu Transit Services, Inc. (OTS) are committed to providing meaningful access to all patrons and users of Honolulu's public transit system who are Limited English Proficient (LEP).

The 2019 LEP Plan (Plan) was developed in accordance with the Federal Transit Administration (FTA) Circular FTA C 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients dated October 1, 2012 (Circular). The Plan identifies the prevalent languages of LEP persons likely to be public transit users and specifies the types of language assistance services that DTS provides. DTS and OTS are committed to providing language assistance services for all LEP transit users to the maximum extent feasible.

II. Definition of a Limited English Proficient Person

The Circular defines an LEP person as a person 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. Hawaii Revised Statute Section 321-C-2 defines LEP person as "an individual who, on account of national origin, does not speak English as the person's primary language and who self identifies as having a limited ability to read, write, speak, or understand the English language".

III. Elements of the LEP Plan

This section contains the essential elements prescribed under the Circular. DTS, OTS, and subrecipients who do not develop their own plans are responsible for implementing this LEP plan.

a. Four Factor Analysis (FFA) Results

Using the 2018 TheBus Fare and Demographic Ridership Survey (Survey), the FFA identified the proportion of LEP persons who self-identified as not speaking English well. The on-board survey was conducted on all 104 bus routes during November/December 2018 and focused on rider demographics, travel patterns, ability to speak English well, and fare usage. A copy of the Survey can be found at: http://www.honolulu.gov/cms-dts-menu/site-dts-sitearticles/908-dite-dts-ptd-cat/32230-language-assistance.html.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.

The Survey was used to identify LEP individuals that use DTS-PTD public transit services. According to the data, 10% do not speak English well. See Table 1 below:

Table 1: Survey Question: How well do you speak English?	
Speak English well	90%
Does not speak English well	10%
Total	100%

Of the people who do not speak English well, the four (4) languages most frequently spoken are: (see Table 2 below)

- Filipino/Tagalog/Ilocano (53.4%)
- Japanese (14%)
- Micronesian/Chuukese (12%)
- Chinese/Mandarin (5.4%)

Table 2: Languages Spoken by LEP Survey Riders		Table 3: Public Transit LEP Ridership		
		6,630 x 5% = 332	66,296 x 10% = 6,630 LEP Ridership	
	LEP Total %	Safe Harbor	LEP Total	LEP Total %
Language	%		6,630	100%
***Chinese	4.0%		265	4.0%
**Chuukese	9.0%		596	9.0%
German	4.0%		265	4.0%
*Filipino	40.0%		2,652	40.0%
Hawaiian	3.0%		199	3.0%
Japanese	14.0%		928	14.0%
Korean	1.4%		93	1.4%
Kosraean	1.4%		93	1.4%
*Mandarin	1.4%		93	1.4%
Mexican	4.0%		265	4.0%
**Micronesian	3.0%		199	3.0%
Chavacano	1.4%		93	1.4%
*Ilocano	6.0%		398	6.0%
*Ilocano/Tagalog	1.4%		93	1.4%
*Tagalog	6.0%		398	6.0%
Total	100.0%		6,630	100.0%
***Chinese+Mandarin= 358 or 5.4% **Chuukese+Micronesian= 795 or 12% *Filipino+Ilocano+Tagalog=3,541 or 53.4% Japanese= 928 or 14%				

Factor 2: The frequency with which LEP persons come into contact with the program.

According to the 2017 National Transit Database, Honolulu's annual public transit ridership was 65.3M unlinked trips (passenger boardings) or approximately 179,000 daily unlinked trips. Based on the Survey's 2.7 daily average of unlinked trips per rider, daily ridership is 66,296 people and 10% or 6,630 riders do not speak English well. See Table 3 above.

Applying the percentages in Factor 1 to the 6,630 LEP persons, the prevalent languages of the people who do not speak English well are:

- Filipino/Tagalog/Ilocano (3,541 or ≈ 53.4%)
- Japanese (928 or ≈ 14%)

- Micronesian/Chuukese (795 or ≈ 12%)
- Chinese/Mandarin (358 or ≈ 5.4%)

Under the Safe Harbor Provision, LEP obligations include languages that constitute 5% or 1,000 persons, whichever is less of the people (6,630) who may use or have contact with public transit services and who do not speak English well. The 5% threshold is 332 persons.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives.

Public transportation is a vital service for many people who are unable to drive for various reasons and those who do not have access to personal vehicles. They depend on the public transit system to take them to where they need to go for work, school, shopping, medical, recreation, and visiting friends and families. Therefore, providing language assistance for LEP public transit users is an important service to ensure they are able to understand how to use the public transit system to their advantage and benefit.

According to the Survey's data for LEP persons:

- 18% are totally dependent upon TheBus and would not be able to make their trip(s) if TheBus did not operate.
- 71% do not have a driver's license.
- 52% make less than $25K annually.
- 92% of the ridership base are Non-Caucasian.

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

DTS-PTD's annual operating budget includes funding for:

- Phone interpretation services: Professional phone interpretation services
- Translation services: Professional translation services
- Printing: Vital documents in identified languages
- Signage: In identified languages as applicable and necessary
- Advertisement: Notices in identified language publications as applicable and necessary
- Consultants: Professional services contracted as applicable and necessary to meet LEP requirements
- Other available resources:
    - Phone interpretation services: In-house staff, other government & non-profit agencies.
    - Partnering with other State, County, and non-profit agencies to provide transit information to the LEP community (i.e. State Office of Language Access, Citizen Corps language cards).

- Translation services: In-house staff, other government & non-profit agencies.

b. Description of Language Assistance Services

- **Types of Language Services Available**

Bus Information, Bus Customer Service, and Bus Pass Offices; Handi-Van Reservations; and Handi-Van Eligibility Center all utilize an interpreter service vendor to provide services to non-English speaking customers. These include Pacific Interpreters (primary) and Corporate Translation Services (CTS) Language Links (secondary).

- **How Staff Can Obtain These Services**

All service staff members have access to the interpreter vendor telephone numbers and codes.

- **Responding to LEP Callers**

1. Ascertain if the caller has any English comprehension to use simplified English.
2. If unable to use simplified English, ascertain the country of origin and/or language dialect to utilize in-house interpreter resources.
3. If unable to identify language or no in-house resource, call the interpreter vendor to provide language assistance via three-way conversation, LEP caller, staff member, and interpreter.

- **Responding to Written Communication from LEP Persons**

1. Identify language and ascertain if there are in-house staff for that language. OTS currently has Ilocano, Tagalog, Japanese, and Chinese, written and spoken language proficient employees.
2. If no in-house staff, use translation vendor.

- **Responding to In-Person Contact with LEP Persons**

1. Identify language with language poster or cards.
2. Call interpreter vendor to provide language assistance via two-way conversation if no in-house resource.

- **Ensuring Competency of Interpreters and Translation**

1. Vendors are selected from the State of Hawaii Price and Vendor List Contracts. There is a screening and credentialing process for interpreter vendors.

2. OTS in-house staff is experienced with years of service.
3. Other agency resources are the Consulates and State Office of Language Access.

- **Documents Considered Essential for Translation**

  DTS considers the following vital documents essential for translation.

  TheBus documents include:

  - Notifying the Public of Rights Under Title VI notice
  - Non-Discrimination Complaint Form
  - "You Have Rights" car card referencing Title VI and Environmental Justice
  - Lost and Found Notification
  - Annual Bus Pass Application
  - Senior Citizen Bus Pass Application
  - Senior Citizen Annual Bus Pass Renewal Application
  - Person with a Disability Bus Pass Application
  - Request for Refund/Exchange/Adjustment
  - Bus Pass Subsidy Program Application

  TheHandi-Van documents include:

  - Notifying the Public of Rights Under Title VI notice
  - Non-Discrimination Complaint Form
  - Rider's Guide
  - Eligibility Information Brochure

  All documents are translated in languages identified in the FFA and are available in hard copy, electronic format, or can be requested via email (thebustop@honolulu.gov), telephone (768-8374), or in person at DTS or TheBus Pass/Customer Service Offices.

- **Subrecipient Monitoring**

  DTS staff monitors its subrecipients on an annual basis to ensure compliance with FTA LEP requirements through on-site visits and desk reviews of requested documents and records.

c. Providing Notice to LEP Persons of Assistance

DTS and OTS communicate with LEP populations by posting notices/signs, online information, and outreach documents in languages identified in the FFA;

and networking with community-based organizations and social service agencies.

TheHandi-Van Eligibility Center communicates with LEP populations by posting signs in its office and through outreach documents.

d. Monitoring and Updating the Plan

Monitoring and updating the Plan will be conducted during the 3-year interval preceding the Title VI Program submission year to FTA in accordance with the FTA Circular. DTS will review and assess Plan applicability, availability of resources (staff, partner agencies, funding), LEP population needs, complaint logs, the most current data (i.e. Census/American Community Survey/State Databook), and relevant surveys/studies to complete Plan updates.

e. Description of How the Recipient Trains the Employees to Provide Language Assistance

DTS and OTS incorporate an LEP video presentation into operators' periodic training for correct handling of LEP riders and their safety. All other relevant employees are also required to view the LEP training video on an annual basis to ensure they possess the knowledge and skills required to provide timely and reasonable language assistance to the LEP population. Training information includes: DTS LEP Plan, local demographic LEP population data, Hawaii Language Access Law background, printed LEP population vital documents/materials, and handling requests in foreign languages.

TheHandi-Van Eligibility Center provides both initial and annual refresher training for all relevant employees that is focused on customer service and to ensure they possess the knowledge and skills required to provide timely and reasonable language assistance to the LEP population.

Attachment 4

Title VI Oversight of Subrecipients, Lessees, and Third Party Contactors Policies and Procedures

PUBLIC TRANSIT DIVISION	INDEX CODE: 7-1.10
CATEGORY: Administration	PAGE 1 of 2

SUBJECT: Title VI Oversight of Subrecipients, Lessees, and Third Party Contractors

REFERENCES: 49 CFR Part 21 Nondiscrimination in Federally Assisted Programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964; FTA C 4702.1B, Title VI Requirements & Guidelines for Federal Transit Administration (FTA) Recipients (or current version); Comprehensive Review Guide for Triennial and State Management Reviews (current FY).

PURPOSE: To establish oversight and monitoring procedures to ensure that subrecipients, lessees, and contractors (collectively referred to as "subrecipients") are complying with the U.S. Department of Transportation Title VI (TVI) regulations as referenced above.

As the primary recipient of FTA financial assistance, the Department of Transportation Services (DTS) Public Transit Division (PTD) must monitor their subrecipients for compliance with TVI regulations. Subrecipients have the option to develop their own TVI Program or adopt the DTS-PTD TVI Program. If a subrecipient is not in compliance with TVI requirements, then DTS-PTD is also not in compliance.

All subrecipients must include the needs of minorities, low-income, and limited-English proficient (LEP) populations in planning activities; and assure that minorities, low-income, and LEP populations are not being denied the benefits of or excluded from participation in their programs.

DTS-PTD shall have the sole responsibility for determining if subrecipients are in compliance with TVI regulations and requirements, including TVI oversight of subrecipients' contractors by subrecipients, if applicable.

PROCEDURES: In order to ensure the primary recipient and subrecipient are in compliance with TVI regulations and requirements, DTS-PTD shall adhere to the following procedures.

1. Title VI Program Submission. Subrecipients that develop their own TVI program must submit it to DTS-PTD for compliance review.
    - New subrecipients shall submit their TVI Program for review within 90 days of the effective date of their subrecipient contract.
    - Existing subrecipients shall submit TVI Programs for review every three years by September 30th.
    - DTS-PTD will complete the compliance review and notify the subrecipient of the results within 90 days of the TVI Program submission date.
    - Deficiencies are addressed in Section 4. Corrective Actions.

2. Provide Assistance to Subrecipients. DTS-PTD will assist all subrecipients with TVI compliance as necessary and appropriate, including TVI program contents, general reporting requirements, and other information/data related to the minority, low-income, and LEP populations that participate in the recipient's programs and activities.

3. Subrecipient Monitoring and Oversight. DTS-PTD will monitor all subrecipients for TVI compliance. Monitoring and oversight activities include but are not limited to: on-site visits, review of relevant records/documents/data/website, interviews, phone/email communication.
    - DTS-PTD will monitor subrecipients on an Annual basis.

SUBJECT: Title VI Oversight of Subrecipients, Lessees, and Third Party Contractors

REFERENCES: 49 CFR Part 21 Nondiscrimination in Federally Assisted Programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964; FTA C 4702.1B, Title VI Requirements & Guidelines for Federal Transit Administration (FTA) Recipients (or current version); Comprehensive Review Guide for Triennial and State Management Reviews (current FY).

- Oversight of TVI general requirements will be conducted using Public Transit Title VI Program Compliance Oversight Monitoring Form-Section 1 General Requirements (12/1/18 or current version).
- Oversight of TVI fixed route service requirements will be conducted using Public Transit Title VI Program Compliance Oversight Monitoring Form-Section 2 Fixed Route Service Requirements (12/1/18 or current version).
- DTS-PTD will notify the subrecipient of the results within 30 days of the monitoring completion date.
- Deficiencies are addressed in Section 4. Corrective Actions.

4. Corrective Actions. Effective compliance with TVI regulations and requirements requires DTS-PTD to take prompt action to achieve voluntary compliance by its subrecipients in all instances in which deficiencies are found. If a subrecipient is determined to be non-compliant:
   - DTS-PTD will offer assistance as necessary to correct the deficiencies.
   - Deficiencies shall be corrected within 30, 60, or 90 days (depending on the corrective action) of the notification date of deficiencies.
   - DTS-PTD will issue a notice that corrective actions have been satisfactorily completed within 30 days of the completion date.

ADOPTED:

WES FRYSZTACKI, Director

Amendment 1

Date: 1.10.2019

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

Public Transit Title VI Program Compliance Oversight Monitoring Form (12/01/18)

Applicability: As a direct and primary recipient of Federal Transit Administration (FTA) funds, the Department of Transportation Services (DTS) is responsible for ensuring that entities receiving FTA financial assistance through DTS comply with FTA's Title VI (TVI) regulations and requirements. *References: FTA Circular 4702.1B, Comprehensive Review Guide for Triennial Reviews (current FY).*

Requirement: DTS must monitor their subrecipients/contractors for compliance with TVI regulations and requirements. *Reference: DTS Standard Operating Procedure 7-1.10 FTA Title VI Program Oversight.*

Monitoring Date: _____ Last Monitoring Date: _____

Agency: _____ Address: _____

POC: _____ Phone: _____ Email: _____

Conducted by: _____

DTS Public Transit Title VI Program Section 1: General Requirements

I. Title VI Program

[ ] Compliant
- [ ] Agency follows DTS Public Transit TVI Program.
- [ ] Agency TVI Program.
  - [ ] Agency's TVI Program has been approved by DTS.
- [ ] A copy of the most current TVI Program is available on the agency website.

[ ] Not Compliant

Corrective Actions:

_____
_____
_____

II. Title VI Notice to the Public

[ ] Compliant
- [ ] Locations where the notice is posted:
  - [ ] Reception area [ ] Transit vehicles [ ] Transit facilities
  - [ ] Meeting rooms [ ] Other: _____

[ ] Not Compliant

Corrective Actions:

_____
_____
_____

III. Title VI Complaint Procedures (*Instructions on how to file a Title VI complaint)*

[ ] Compliant

[ ] Procedures to request additional information on the recipient's TVI obligations.

[ ] Procedures to file a TVI discrimination complaint against the recipient.

[ ] Available on the agency website.

[ ] Translated into languages identified in the most current Language Assistance Plan (LAP).

[ ] Not Compliant

Corrective Actions:

_____

_____

_____

IV. Title VI Complaint Form

[ ] Compliant

[ ] Available on the agency website.

[ ] Translated into languages identified in the most current LAP.

[ ] Not Compliant

Corrective Actions:

_____

_____

_____

V. List of transit-related Title VI investigations, complaints, and lawsuits

[ ] Compliant

[ ] Procedures for investigating and tracking TVI complaints filed against agency.

[ ] Reports complaints and investigations on an annual basis.

[ ] Reports lawsuits immediately upon occurrence.

[ ] Not Compliant

Corrective Actions:

_____

_____

_____

VI. Public Participation Plan (PPP)

[ ] Compliant

[ ] Agency follows DTS Public Transit PPP.

[ ] Agency PPP.

[ ] Agency's PPP has been approved by DTS.

[ ] PPP efforts made since the last monitoring date _____.

[ ] List of upcoming activities subject to PPP since last monitoring date.

[ ] PPP is available on the agency's website.

[ ] Not Compliant

Corrective Actions:

_____

_____

_____

VII. Language Assistance Plan (LAP)

[ ] Compliant
- [ ] Agency follows DTS Public Transit LAP.
- [ ] Agency LAP.
  - [ ] Agency's LAP has been approved by DTS.
    - [ ] Four Factor Analysis.
    - [ ] Monitored and last updated on _____.
- [ ] Language assistance services.
- [ ] Limited English Proficient (LEP) persons notification of language assistance.
- [ ] Vital documents translated.
- [ ] Oral interpretation services available.
- [ ] Employees trained to provide timely and reasonable language assistance.
- [ ] LAP is available on the agency's website.

[ ] Not Compliant

Corrective Actions:

_____

_____

_____

VIII. Monitoring of entities receiving FTA financial assistance through DTS (TVI requirements flow down to all third party contractors and their contracts at every tier.)

[ ] Compliant
- [ ] Agency list of third party contracts with/without flow down of FTA funds since last monitoring date _____.
  - [ ] Third party contractors receiving flow down of FTA funds from Agency.
    - [ ] Agency documentation of TVI monitoring and contractor compliance with TVI requirements and regulations.

[ ] Not Compliant

Corrective Actions:

_____

_____

_____

IX. Transit Facility Equity Analysis

[ ] Compliant
- [ ] Agency constructed or plans to construct a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., since the last Public Transit TVI Program submission to FTA on _____.
  - [ ] Equity analysis approved by DTS.
  - [ ] Equity analysis not applicable. Reason _____.

[ ] Not Compliant

Corrective Actions:

_____

_____

_____

[ ] NA

X. Board Approval and Board Minority Representation

[ ] Compliant
- [ ] Agency Board approval.
- [ ] Table depicting racial breakdown of non-elected Board members.

[ ] Not Compliant

Corrective Actions:

_____

[ ] NA

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

Public Transit Title VI Program Compliance Oversight Monitoring Form (12/01/18)

Applicability: As a direct and primary recipient of Federal Transit Administration (FTA) funds, the Department of Transportation Services (DTS) is responsible for ensuring that entities receiving FTA financial assistance through DTS comply with FTA's Title VI (TVI) regulations and requirements. *Reference: Comprehensive Review Guide for Triennial Reviews (current FY).*

Requirement: DTS must monitor their subrecipients/contractors for compliance with TVI regulations and requirements. *References: FTA Circular 4702.1B; DTS Standard Operating Procedure 7-1.10 FTA Title VI Program Oversight.*

Monitoring Date: _____ Last Monitoring Date: _____

Agency: _____ Address: _____

POC: _____ Phone: _____ Email: _____

Conducted by: _____

DTS Public Transit Title VI Program Section 2: Fixed Route Service Requirements

I. System-wide Service Standards for Each Mode

[ ] Compliant
- [ ] Vehicle load.
- [ ] Vehicle headway.
- [ ] On-time performance.
- [ ] Service availability.

[ ] Not Compliant

Corrective Actions:

_____
_____
_____

II. System-wide Service Policies

[ ] Compliant
- [ ] Transit amenities.
- [ ] Vehicle assignment.

[ ] Not Compliant

Corrective Actions:

_____
_____
_____

III. Demographic and Service Profile

[ ] Compliant

[ ] Base service area.

[ ] Title VI areas.

[ ] Environmental Justice areas.

[ ] Title VI and Environmental Justice areas.

[ ] Not Compliant

Corrective Actions:

_____

_____

_____

IV. Demographic Ridership and Travel Patterns

[ ] Compliant

[ ] Not Compliant

Corrective Actions:

_____

_____

_____

V. Service and Fare Changes

[ ] Compliant

[ ] Public engagement process.

[ ] Not Compliant

Corrective Actions:

_____

_____

_____

VI. Monitoring Program and Report

[ ] Compliant

[ ] Not Compliant

Corrective Actions:

_____

_____

_____

Attachment 5

Determination of Site or Location of Facilities Policy and Procedures

CATEGORY: FACILITIES AND EQUIPMENT	Index Code: 7-5.13 Page 1 of 2

SUBJECT: Determination of Site or Location of Facilities

REFERENCE: FTA C 4702.1B, Title VI Requirements & Guidelines for Federal Transit Administration (FTA) Recipients (or current version); Comprehensive Review Guide for Triennial and State Management Reviews (current FY)

PURPOSE: To establish procedures for selecting sites for constructing transit facilities.

PROCEDURES:

1. Facilities included in this SOP include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. For purposes of this requirement, "facilities" does not include bus shelters, as these are transit amenities, nor does it include transit stations, power substations, etc.

2. Site evaluation will be based on the following criteria:
   a. Level of need.
   b. Impact to surrounding properties.
   c. Accessibility to bus and handi-van routes.
   d. Impact to existing infrastructure.
   e. Environmental impact.
   f. Terrain constraints.
   g. Traffic impact.
   h. Size of property to accommodate the project requirements.
   i. Adequacy of existing utilities (i.e. sewer, water, drainage, fire protection, electricity, etc.).
   j. Flood zone impact.
   k. Obtain the necessary approvals for facility construction.
   l. DTS Director's approval.
   m. Conform to the objectives of FTA's Title VI Program, as set forth in FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients." The determination of site or location of facilities shall conform to Title 49 CFR Section 21.9(b)(3).

3. When evaluating locations of facilities:
   a. Give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result.
   b. Analysis should be done at the Census tract or block group, where appropriate, to ensure that proper perspective is given to localized impacts.

SUBJECT: Determination of Site or Location of Facilities

c. If it is determined that the location of the project will result in a disparate impact on the basis of race, color, or national origin, the project may only be located in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. It must be shown how both elements are met. In order to make this showing, consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.
d. Conduct outreach to persons potentially impacted by the siting of facilities.
e. A site determination or location of facilities Title VI analysis shall be completed prior to selection of the preferred site.

ADOPTED:

WES FRYSZTACKI

Date 4.2.2019

Amendment _____

Attachment 6

Honolulu City Council Approval

City Council approval will be included in the final draft submitted to FTA. Tentative meeting dates are:

- April 25, 2019 City Council Transportation Committee
- May 8, 2019 Honolulu City Council

Attachment 7

Monitoring Report
System-wide Service Standards & Policies

Monitoring Report
System-wide Service Standards & Policies

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Transit Amenities
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Overview

Federal Transit Administration (FTA) C 4702.1B Circular (Circular) Chapter 4 requires all transit providers that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area of 200,000 or more in population to include information about service standards and policies for each specific fixed route mode of service provided to ensure service design and operational practices do not result in discrimination on the basis of race/color/national origin (TVI), or low-income status (EJ). In accordance with the Circular guidelines, system-wide service standards address vehicle load, headway, on-time performance, service availability; and system-wide service policies include transit amenities and vehicle assignment.

Routes were identified as TVI/EJ routes based on the 2010 Census block groups identified in the "Oahu Metropolitan Planning Organization's Title VI/Environmental Justice Analysis Update Report, September 2016" that the route served. Census block groups were identified as TVI/EJ if the minority and/or low-income percentage in that Census block group was greater than the mean percentage (29%) of minority and/or low-income for the system (within a ½ mile radius of a bus route). Routes that exceed the mean TVI/EJ population among all routes are designated as TVI/EJ routes. The mean is based on the total TVI/EJ percentage within a ½ mile radius of all routes divided by the total number of routes (104). See Figure 1.

The service standards section reports the performance of TheBus service for all 104 routes to identify disparate areas that adversely affect TVI/EJ routes more than non-TVI/EJ routes and therefore, require further analysis/monitoring for mitigation purposes. The service policies section reports the physical inventory taken of transit amenities and the current vehicle assignment roster. 2018 data was evaluated for this report.

Findings

The results of TheBus service performance for all 104 routes are summarized below. While identified disparities are currently being addressed, overall, TheBus service is provided in a non-discriminatory manner.

System-wide Service Standards:

- Vehicle Load: Generally, all but 6 routes met the 10% standard for the percentage of annual passenger minutes exceeding the vehicle load factor standard. DTS will evaluate the 3 non-TVI/EJ and 3 TVI/EJ routes to address overcrowding.

- Vehicle Headway: Generally, most routes do not meet the vehicle headway standard for 2 or more periods. DTS will evaluate non-conforming scheduled headways and adjust accordingly to ensure that all routes are in general conformance to the vehicle headway standard.

- On-time performance: Generally, most routes do not meet the on-time performance standard. DTS will evaluate non-conforming routes with additional analysis/monitoring to identify factors affecting on-time performance for mitigation

purposes. Such factors include various external causes such as: traffic congestion, traffic accidents, and road/lane closures attributable to construction projects/road resurfacing or rehabilitation/rail construction; and are difficult to mitigate.

- Service availability: The standard was met for TVI/EJ and non-TVI/EJ populations.

Service Policies:

- Transit amenities: Generally, all TVI/EJ routes have higher distribution percentages of amenities at bus stops.

- Vehicle assignment: Generally all TVI/EJ and non-TVI/EJ routes are assigned vehicles comparable in age with TVI/EJ route vehicles ranging between 2 – 3 years newer than the non-TVI/EJ route vehicles assigned for each mode.

Figure 1
Bus Route Summary: Proportion of TVI/EJ Served Populations
(Title VI/EJ Routes Shaded)

Route (Service Area)	% TVI/EJ in Service Area	Route (Service Area)	% TVI/EJ in Service Area	Route (Service Area)	% TVI/EJ in Service Area	Route (Service Area)	% TVI/EJ in Service Area
1	23	42	36	89	29	501	8
2	24	43	45	90	22	503	24
3	23	44	41	91	36	504	10
4	19	51	32	92	29	1L	19
5	21	52	29	93	56	2L	24
6	18	53	23	94	25	57A	15
7	45	54	21	96	29	80A	11
8	14	55	29	97	25	80B	17
9	30	56	19	98	29	84A	23
10	35	57	20	99	24	85A	27
11	23	65	19	101	32	88A	35
13	22	70	19	102	33	98A	21
14	5	71	0	103	28	9S	15
15	13	72	68	234	0	A	35
16	63	73	24	235	0	C	49
17	17	74	10	401	100	E	28
18	15	76	2	402	99	PH1	76
19	32	77	34	403	92	PH2	22
20	30	80	11	411	28	PH3	34
22	9	81	38	413	29	PH4	36
23	9	82	12	414	17	PH5	20
24	0	83	29	415	35	PH6	29
31	55	84	25	416	43	PH7	45
32	33	85	20	432	43	W1	35
40	48	87	12	433	29	W2	27
41	41	88	31	434	36	W3	30

(Source: The Oahu Metropolitan Planning Organization Title VI/Environmental Justice Analysis Update Report, September 2016)

Figure 1 above displays the bus routes and the proportion of the service area (within a ½ mile radius of a bus route) designated as TVI/EJ. Of 104 routes, 48 routes are identified as TVI/EJ. Routes were identified as TVI/EJ routes based on a ½ mile radius that the route served. 29% is used as the minimum level for designating routes as TVI/EJ because it is the mean percentage of all TVI/EJ populations within a ½ mile radius among the routes.

Figure 2 below identifies the route names.

Figure 2

TheBus — ROSTER OF BUS ROUTES — Effective 03/04/18

Route No.	Initial	KALIHI DIVISION (54) ROUTE NAME	Route No.	Initial	PEARL CITY DIVISION (50) ROUTE NAME
PH4	KKPH	Kaneohe-Kahaluu-Pearl Harbor Exp.	A	CXA	City Express! A
PH5	WWPH	Windward-Pearl Harbor Express	C	CXC	Country Express! C
PH6	HKPH	Hawaii Kai-Pearl Harbor Express	E	CXE	Country Express! E
W3	KSX	Kalihi via School Street Express	PH1	WCPH	Waianae Coast-Pearl Harbor Express
1	KK	Kaimuki-Kalihi	PH2	MTPH	Mililani Town Pearl-Harbor Express
1L	SHKL	School Street-Hawaii Kai Limited	PH3	WHPH	Wahiawa Heights-Pearl Harbor Exp.
2	WSM	Waikiki-School-Middle	PH7	EBPH	Ewa Beach-Pearl Harbor
2L	WSML	Waikiki-School-Middle Limited	W1	WFX	Waipahu via Farrington Express
3	KSL	Kaimuki-Salt Lake	W2	WPX	Waipahu via Paiwa Express
4	NP	Nuuanu-Punahou	40	HM	Honolulu-Makaha
5	AMM	Ala Moana-Manoa	41	KEB	Kapolei-Ewa Beach
6	PW	Pauoa-Woodlawn	42	EBW	Ewa Beach-Waikiki
7	KV	Kalihi Valley	44	WEB	Waipahu-Ewa Beach
8	WAM	Waikiki-Ala Moana	51	HW	Honolulu-Wahiawa
9	KPH	Kaimuki-Pearl Harbor	52	HMH	Honolulu-Mililani-Haleiwa
9s	PV	Palolo Valley	53	HPP	Honolulu-Pacific Palisades
10	KAH	Kalihi-Alewa Heights	55	HKH	Honolulu-Kaneohe-Haleiwa
11	MHA	Makalapa-Halawa-Aiea Heights	65	HK	Honolulu-Kahaluu
13	LWU	Liliha-Waikiki-University	71	PN	Pearlridge-Newtown
14	SM	St. Louis-Maunalani	72	SWW	Schofield-Wahiawa-Whitmore
15	MPH	Makiki-Pacific Heights	73	LCC	Leeward Community College
16	MV	Moanalua Valley	76	WH	Waialua-Haleiwa
17	MAM	Makiki-Ala Moana	81	WX	Waipahu Express
18	UAM	University-Ala Moana	83	WTX	Wahiawa Town Express
19	WAH	Waikiki-Airport-Hickam	84	MXN	Mililani Express-North
20	WP	Waikiki-Pearlridge	84A	MXS	Mililani Express-South
22	BB	Beach Bus	88	KAX	Kahaluu-Ahuimanu Express
23	HKS	Hawaii Kai-Sea Life Park	88A	NSX	North Shore Express
24	KAH	Kapahulu-Aina Haina	90	PCX	Pearl City Express
31	TM	Tripler-Mapunapuna	91	EBX	Ewa Beach Express
32	KP	Kalihi-Pearlridge	92	MCX	Makakilo City Express
43	WHA	Waipahu-Honolulu-Alapai	93	WCXC	Waianae Coast Express-CBD
54	HPC	Honolulu-Pearl City	96	WGX	Waipio Gentry Express
56	HKK	Honolulu-Kailua-Kaneohe	99	WMWK	Wahiawa-Mililani-Waipahu-Kapolei
57	KWS	Kailua-Waimanalo-Sea Life Park	101	EGX	Ewa Gentry Express
57A	KEL	Kailua-Enchanted Lake	102	VKX	Villages of Kapolei Express
70	LM	Lanikai-Maunawili	401	WV	Waianae Valley
74	AHH	Aiea-Halawa Heights	402	LH	Lualualei Homestead
77	WK	Waimanalo-Kaneohe	403	NMW	Nanakuli-Maili-Waianae
80	HKPR	Hawaii Kai Park & Ride Express	411	MH	Makakilo Heights
80A	HKPU	Hawaii Kai Park & Ride Express-UH	413	CIP	Campbell Industrial Park
80B	UAX	Upper Aina Haina Express	414	PMK	Palahia-Makakilo-Kapolei
82	HKPR	Hawaii Kai Park & Ride Express	415	KTCK	Kapolei Transit Center-Kalaeloa
85	WWXK	Windward Express-Kaneohe	416	KC	Kapolei Circulator
85A	WWXH	Windward Express-Haiku	432	EWW	East-West Waipahu
87	WWXK	Windward Express-Kailua	433	WWSC	Waipahu-Waikele Shopping Center
89	WKX	Waimanalo-Kailua Express	434	WVP	Waipahu-Village Park
94	VKKX	Villages of Kapolei-Kaupea Express	501	MM	Mililani Mauka
97	VPX	Village Park Express	503	MLV	Mililani-Launani Valley
98	WMPR	Wahiawa-Mililani Park & Ride	504	MS	Mililani South
98A	MTC	Wahiawa-Mililani Transit Center			
103	PWX	Paiwa-Waikele Express			
234	KMWN	Kahala Mall-Waialae Nui			
235	KMWI	Kahala Mall-Waialae Iki			

Route Description and Time Schedules

All 104 Individual route maps and time schedules can be viewed by visiting the OTS website: http://www.thebus.org/route/routes.asp.

Hard copies of maps and schedules are available at all Satellite City Halls, DTS, and TheBus Pass Office or mailed on request by calling (808) 768-8396 or emailing thebustop@honolulu.gov.

Service Standards

A. Vehicle Loads

For most of the time, TheBus routes operate with sufficient frequency to provide every passenger with a seat. However, during the heaviest travel times or locations, passengers will experience standing loads. During these periods, DTS strives to provide sufficient service so that people are reasonably comfortable.

The purpose of the vehicle load standard is to define the comfort levels of crowding that are acceptable by mode and time period. DTS defines vehicle load factor as the ratio of passengers on board to the number of seats on a vehicle. There are a number of different types of vehicles in the TheBus fleet at any given time, and the fleet changes over time. Hence, the actual seating capacity and maximum number of passengers allowed by the comfort standards for each mode changes periodically.

For every route, DTS measures passenger hours that experience overcrowded conditions during each time period. The DTS standard is that no more than 10% of annual passenger hours shall exceed the vehicle load factor standard for overcrowding. DTS will evaluate routes that do not meet the 10% standard to address overcrowding.

Maximum vehicle load factors for all modes and periods are defined in the following table.

Vehicle Load Factor Standard						
	Weekday					Weekend
Service Mode	AM Peak (1st bus – 9am)	Base (9am – 2pm)	PM Peak (2pm – 6pm)	Night (6pm – 12pm)	Night Owl (12pm – last Bus)	All Day
Rapid Bus	1.4	1.2	1.4	1.2	1.2	1.2
Trunk	1.4	1.2	1.4	1.2	1.2	1.2
Circulator	1.4	1.2	1.4	1.2	1.2	1.2
Peak Hour Express	1.2	NA	1.2	NA	NA	1.2
*Community Access	1.4	1.2	1.4	1.2	1.2	1.2

*Currently, there is no Community Access service.

TheBus fleet is comprised of vehicles differing in size and models. Routes are assigned vehicles in accordance with the Vehicle Assignment Policy. The maximum load standards for vehicle sizes with models that vary in seated capacity have been averaged to account for the difference:

Vehicle Size	No. of Models	No of Seats	Avg No. of Seats	1.2 Max Capacity	1.4 Max Capacity
30 feet	3	23-29	26	32	36
35 feet	2	35	35	42	49
40 feet high floor (LF)	13	36-40	38	46	53
40 feet low floor (HF)	5	45	45	54	63
60 feet	10	57-58	58	70	81

The following vehicle load tables show the total percentage of annual passenger hours that experienced overcrowded conditions and exceeded the vehicle load factor standard per route per service mode according to the vehicle assigned to each trip. TVI/EJ routes are highlighted in red.

Rapid Bus					
	Percent of annual passenger minutes that exceeded the maximum vehicle load factor standard				
Standard	1.4	1.2	1.4	1.2	1.2
Route	AM Peak (1st bus-9am)	Base (9am-2pm)	PM Peak (2pm-6pm)	Night (6pm-last bus)	Weekend (all day)
A	1%	1%	1%	0%	0%
C	0%	2%	1%	0%	0%
E	1%	2%	2%	0%	2%

There are three (3) Rapid Bus routes: two TVI/EJ, and one non-TVI/EJ route. All Rapid Bus routes met the 10% standard for the percentage of annual passenger minutes exceeding the vehicle load factor standard.

Trunk					
	Percent of annual passenger minutes that exceeded the maximum vehicle load factor standard				
Standard	1.4	1.2	1.4	1.2	1.2
Route	AM Peak (1st bus-9am)	Base (9am-2pm)	PM Peak (2pm-6pm)	Night (6pm-last bus)	Weekend (all day)
1	2%	3%	2%	1%	1%
1L	1%	3%	1%		
2	3%	7%	4%	2%	6%
2L	2%		1%		
3	2%	6%	6%	2%	3%
4	1%	0%	1%	0%	0%
6	0%	0%	0%	0%	0%
9	1%	2%	2%	0%	0%
11	1%	0%	6%	3%	0%
13	3%	8%	6%	2%	8%
19	3%	4%	6%	3%	5%
20	3%	17%	6%	0%	20%
22	3%	28%	10%		9%
23	1%	5%	2%	1%	5%
40	0%	4%	1%	1%	2%
42	1%	5%	1%	1%	4%
43	1%	1%	2%		
51	1%	1%	2%	0%	1%
52	1%	2%	1%	1%	3%
53	0%	0%	0%	0%	0%
54	0%	0%	1%	0%	1%
55	1%	3%	1%	0%	1%
56	0%	0%	2%	0%	1%
57	1%	4%	4%	1%	5%
57A	0%	2%	0%		2%
65	0%	3%	0%	0%	0%

Trunk – There are 26 routes: 9 TVI/EJ routes; 17 non-TVI/EJ routes. All trunk routes met the 10% standard for the percentage of annual passenger minutes exceeding the vehicle load factor standard, except TVI/EJ Route 20 and non-TVI/EJ Route 22.

- Route 20 provides Waikiki/Airport/Pearlridge service: Base (17%) and weekend (20%) periods did not meet the 10% standard.
- Route 22 provides Waikiki/Hanauma Bay/Sea Life Park service: Base period (28%) did not meet the 10% standard.

DTS will evaluate Routes 20 & 22 to address overcrowding during these periods.

Circulator					
	Percent of annual passenger minutes that exceeded the maximum vehicle load factor standard				
Standard	1.4	1.2	1.4	1.2	1.2
Route	AM Peak (1st bus-9am)	Base (9am-2pm)	PM Peak (2pm-6pm)	Night (6pm-last bus)	Weekend (all day)
5	0%	0%	0%	0%	0%
7	2%	2%	2%	0%	0%
8	0%	1%	2%	2%	1%
9S	0%	0%	0%	0%	0%
10	0%	0%	0%	0%	0%
14	0%	0%	0%	0%	0%
15	0%	0%	1%	0%	0%
16	0%		0%		
17	0%	0%	0%	0%	0%
18	0%	0%	0%	0%	2%
24	0%	0%	4%	4%	0%
31	0%	0%	0%	0%	0%
32	0%	0%	0%	0%	0%
41	0%	0%	0%	0%	0%
44	0%	0%	0%	0%	0%
70	0%	0%	0%	0%	0%
71	0%		0%		
72	0%	0%	0%	0%	0%
73	0%	0%	0%		
74	0%		0%		
76	0%	0%	0%	0%	0%
77	0%	1%	0%		
234	0%		0%		
235	0%		0%		
401	0%	0%	0%	0%	0%
402	0%	0%	0%	0%	0%
403	0%	0%	0%	0%	0%
411	0%	0%	0%	0%	0%
413	0%		0%		
414	0%	0%	0%	0%	0%
415	0%		0%	0%	
416	0%	0%	0%	0%	0%
432	0%	0%	0%	0%	0%
433	0%	0%	0%	0%	0%
434	0%	0%	1%	0%	0%
501	4%	0%	3%	0%	0%
503	0%	3%	0%	0%	0%
504	0%	0%	0%	0%	0%

Circulator – There are 38 routes: 18 TVI/EJ routes; 20 non-TVI/EJ routes. All circulator routes met the 10% standard for the percentage of annual passenger minutes exceeding the vehicle load factor standard.

Peak Express					
	Percent of annual passenger minutes that exceeded the maximum vehicle load factor standard				
Standard	1.2	NA	1.2	NA	1.2
Route	AM Peak (1st bus-9am)	Base (9am-2pm)	PM Peak (2pm-6pm)	Night (6pm-last bus)	Weekend (all day)
80	0%		0%		
80A	3%		2%		
80B	0%				
81	5%		3%		
82	3%		3%		
83	1%		0%		
84	0%		0%		
84A	1%		0%		
85	0%		1%		
85A	3%		1%		
87	0%		0%		
88	0%		0%		
88A	0%		0%		
89	3%		1%		
90	3%		1%		
91	1%		4%		
92	0%		0%		
93	1%		0%		
94	0%		3%		
96	0%		0%		
97	5%		2%		
98	1%		0%		
98A	0%		5%		
99	4%		0%		
101	4%		5%		
102	0%		0%		
103	0%		11%		
PH1	1%		0%		
PH2	0%		0%		
PH3	0%		0%		
PH4	0%		4%		
PH5	0%		3%		
PH6	2%		0%		
PH7	0%		0%		
W1	11%		26%		26%
W2	4%		0%		37%
W3	20%		29%		16%

Peak Express – There are 37 routes: 19 TVI/EJ routes; 18 non-TV/EJ routes. All routes met the 10% standard for the percentage of annual passenger minutes exceeding the vehicle load factor standard, except TVI/EJ Routes W1 & W3, and non-TVI/EJ Routes W2 & 103.

- Route W1 provides Waipahu/Waikiki service: All periods (11% AM, 26% PM & Weekend) did not meet the 10% standard.
- Route W3 provides Kalihi/Waikiki service: All periods (20% AM, 29% PM, 16% Weekend) did not meet the 10% standard.
- Route W2 provides Waipahu/Waikiki service: Weekend period (37%) did not meet the 10% standard.
- Route 103 provides Waikele/Downtown service: PM period (11%) did not meet the 10% standard.

DTS will evaluate Routes W1, W2, W3, and 103 to address overcrowding during these periods.

B. Vehicle Headways

Vehicle headway is defined as amount of time between two vehicles traveling in the same direction on the same route. Scheduling headway across service modes and time periods is affected by the following factors, including but not limited to: ridership, route length, traffic congestion/conditions, population density, demand generators, and budget constraints. Such factors may affect scheduled headway by up to 10 minutes, an acceptable duration to remain in conformance with the vehicle headway standard.

Vehicle Headway Standard (in minutes)						
	Weekday					Weekend
Service Mode	AM Peak (1st bus – 9am)	Base (9am – 2pm)	PM Peak (2pm – 6pm)	Night (6pm – 10m)	Night Owl (12pm – last bus)	All Day
Rapid Bus	15	30	15	30	D	30-45
Trunk	20	30	20	45	D	30-60
Circulator	30	45	30	60	D	60
Peak Hour Express	D	NA	D	NA	NA	NA
*Community Access	D	D	D	D	D	D

*Currently, there is no Community Access service. D: As appropriate to meet demand

Vehicle headways and standards for bus routes are detailed in the following tables according to periods (AM peak, mid-day base, PM peak, nights, and weekends). If there is only a single trip, there is no headway. TVI/EJ routes are highlighted in red.

Rapid Bus					
Standard (minutes)	15	30	15	30	30-45
Route	AM Peak (1st Bus – 9am)	Base (9am – 2pm)	PM Peak (2pm – 6pm)	Night (6pm – last Bus)	Weekend All Day
A	17	18	18	32	23
C	30	35	38	52	30
E	33	37	38	42	61

Rapid Bus – There are 3 routes: 2 TVI/EJ; 1 non-TVI/EJ routes. DTS will evaluate non-conforming scheduled headways and adjust accordingly to ensure that all routes are in general conformance to the vehicle headway standard.

Trunk					
Standard (minutes)	**20**	**30**	**20**	**45**	**30-60**
Route	**AM Peak (1st Bus – 9am)**	**Base (9am – 2pm)**	**PM Peak (2pm – 6pm)**	**Night (6pm – last Bus)**	**Weekend All Day**
1	12	17	15	34	16
1L	45	37	44		
2	15	13	13	30	18
2L	7		10		
3	12	20	17	33	26
4	16	20	14	32	30
6	21	24	25	35	31
9	19	52	27	51	41
11	48	59	47	65	69
13	18	17	18	33	19
19	35	46	38	34	41
20	47	47	50	Single trip	52
22	52	57	37		38
23	34	40	45	45	63
40	34	41	33	29	36
42	33	38	46	44	33
43	43	33	36		
51	20	25	27	53	31
52	30	37	34	46	41
53	26	40	28	47	56
54	24	32	21	45	35
55	32	48	42	52	45
56	36	55	44	59	53
57	21	41	27	50	59
57A	27	59	59		55
65	42	52	46	53	57

Trunk – There are 26 routes: 9 TVI/EJ routes; 17 non-TVI/EJ routes. DTS will evaluate non-conforming scheduled headways and adjust accordingly to ensure that all routes are in general conformance to the vehicle headway standard.

Circulator					
Standard (minutes)	30	45	30	60	60
Route	AM Peak (1st Bus – 9am)	Base (9am – 2pm)	PM Peak (2pm – 6pm)	Night (6pm – last Bus)	Weekend All Day
5	29	49	54	42	51
7	19	42	17	41	45
8	18	9	12	15	12
9S	28	27	27	27	29
10	35	43	34	54	61
14	22	30	25	23	28
15	28	45	22	52	57
16	26		32		
17	29	36	21	30	33
18	49	56	58	51	65
24	48	52	48	47	65
31	27	48	31	42	48
32	33	57	33	54	59
41	32	39	34	37	71
44	54	58	76	63	65
70	64	74	50	34	71
71	35		37		
72	61	67	73	77	79
73	25	31	26		
74	42		42		
76	35	36	35	29	39
77	76	82	79		
234	26		35		
235	26		40		
401	54	55	49	47	57
402	51	55	48	46	57
403	54	55	53	51	58
411	28	28	18	39	43
413	27		29		
414	50	51	49	45	56
415	24		21	Single trip	
416	52	52	51	47	57
432	15	17	16	21	19
433	29	29	28	40	42
434	38	38	35	39	44

Circulator continued					
Standard (minutes)	**30**	**45**	**30**	**60**	**60**
Route	**AM Peak (1st Bus – 9am)**	**Base (9am – 2pm)**	**PM Peak (2pm – 6pm)**	**Night (6pm – last Bus)**	**Weekend All Day**
501	37	43	41	38	55
503	43	50	52	27	55
504	41	40	39	37	47

Circulator – There are 38 routes: 18 TVI/EJ routes; 20 non-TVI/EJ routes. DTS will evaluate non-conforming scheduled headways and adjust accordingly to ensure that all routes are in general conformance to the vehicle headway standard.

Peak Express					
Standard (minutes)	**Demand**	**NA**	**Demand**	**NA**	**NA**
Route	**AM Peak (1st Bus – 9am)**	**Base (9am – 2pm)**	**PM Peak (2pm – 6pm)**	**Night (6pm – last Bus)**	**Weekend All Day**
80	14		16		
80A	31		29		
80B	29				
81	10		12		
82	20		26		
83	11		13		
84	19		21		
84A	21		19		
85	17		30		
85A	34		35		
87	17		23		
88	21		22		
88A	23		39		
89	23		25		
90	25		22		
91	13		15		
92	17		25		
93	13		15		
94	23		36		
96	19		25		
97	14		19		
98	20		25		
98A	25		39		
99	37		30		
101	14		15		
102	19		25		
103	18		23		
PH1	Single trip		Single trip		
PH2	Single trip		Single trip		
PH3	Single trip		Single trip		
PH4	Single trip		Single trip		
PH5	Single trip		Single trip		
PH6	Single trip		Single trip		
PH7	Single trip		Single trip		
W1	13		25		33

Peak Express Continued					
Standard (minutes)	**Demand**	**NA**	**Demand**	**NA**	
Route	**AM Peak (1st Bus – 9am)**	**Base (9am – 2pm)**	**PM Peak (2pm – 6pm)**	**Night (6pm – last Bus)**	**Weekend All Day**
W2	15		26		37
W3	18		22		36

Peak Express – There are 37 routes: 19 TVI/EJ routes; 18 non-TV/EJ routes. There is no numerical standard for Peak Express vehicle headway; instead headway is scheduled to meet demand. The average headway for TVI/EJ routes is 17 minutes and 23 minutes for non-TVI/EJ routes.

B. On-Time Performance

The average measure of runs completed as scheduled.

- On-time is measured as 2 minutes early to 5 minutes late of scheduled arrival and departure times.
- Early is greater than 2 minutes of the scheduled departure time.
- Late is greater than 5 minutes of the scheduled arrival time.

The Standard for all service modes is 80%.

On-time performance for bus routes are detailed in the following tables according to service modes and periods (AM peak, mid-day base, PM peak, evening, and weekends). TVI/EJ routes are highlighted in red.

Rapid Bus					
Standard	**80%**	**80%**	**80%**	**80%**	**80%**
Route	**AM Peak (1st Bus – 9am)**	**Base (9am – 2pm)**	**PM Peak (2pm – 6pm)**	**Night (6pm – last Bus)**	**Weekend All Day**
A	68%	73%	62%	69%	58%
C	77%	70%	51%	54%	60%
E	83%	81%	53%	79%	65%

Rapid Bus – There are 3 routes: 2 TVI/EJ; 1 non-TVI/EJ routes. DTS will evaluate non-conforming routes with additional analysis/monitoring to identify factors affecting on-time performance for mitigation purposes.

Trunk					
Standard (minutes)	**80%**	**80%**	**80%**	**80%**	**80%**
Route	**AM Peak (1st Bus – 9am)**	**Base (9am – 2pm)**	**PM Peak (2pm – 6pm)**	**Night (6pm – last Bus)**	**Weekend All Day**
1	84%	80%	78%	77%	79%
1L	61%	69%	63%		
2	76%	68%	61%	71%	62%
2L	88%		86%		
3	69%	65%	59%	71%	55%
4	78%	79%	69%	64%	80%
6	76%	73%	61%	52%	63%
9	59%	55%	51%	67%	47%
11	67%	70%	63%	70%	76%
13	68%	63%	56%	54%	61%
19	70%	59%	59%	70%	59%
20	56%	56%	62%	73%	57%
22	86%	46%	55%		44%
23	65%	54%	50%	54%	43%
40	65%	59%	55%	58%	49%
42	52%	53%	51%	63%	55%
43	77%	84%	81%		
51	58%	57%	41%	81%	52%
52	80%	76%	64%	78%	71%
53	86%	67%	44%	62%	88%
54	83%	78%	69%	80%	72%
55	71%	58%	53%	57%	56%
56	71%	66%	61%	63%	64%
57	65%	56%	47%	61%	45%
57A	79%	69%	69%		44%
65	74%	77%	66%	80%	88%

Trunk – There are 26 routes: 9 TVI/EJ routes; 17 non-TVI/EJ routes. DTS will evaluate non-conforming routes with additional analysis/monitoring to identify factors affecting on-time performance for mitigation purposes.

Circulator					
Standard (minutes)	80%	80%	80%	80%	80%
Route	AM Peak (1st Bus – 9am)	Base (9am – 2pm)	PM Peak (2pm – 6pm)	Night (6pm – last Bus)	Weekend All Day
5	87%	86%	75%	88%	86%
7	68%	77%	71%	78%	75%
8	98%	77%	76%	84%	65%
9S	95%	91%	87%	89%	92%
10	82%	82%	76%	53%	73%
14	65%	65%	65%	65%	65%
15	80%	82%	68%	78%	84%
16	90%		88%		
17	83%	82%	75%	86%	81%
18	72%	68%	35%	60%	55%
24	82%	67%	46%	58%	54%
31	82%	89%	86%	93%	92%
32	74%	74%	61%	66%	77%
41	60%	68%	64%	71%	39%
44	73%	70%	57%	54%	80%
70	79%	64%	45%	71%	65%
71	84%		49%		
72	81%	77%	58%	67%	77%
73	66%	68%	51%		
74	90%		71%		
76	97%	89%	76%	93%	92%
77	72%	75%	67%		
234	83%		69%		
235	89%		71%		
401	84%	93%	65%	73%	91%
402	61%	61%	61%	61%	61%
403	77%	70%	28%	34%	62%
411	91%	93%	82%	69%	81%
413	40%		80%		
414	81%	84%	78%	81%	86%
415	100%		92%	94%	
416	66%	69%	54%	68%	82%
432	79%	81%	68%	74%	84%
433	84%	87%	52%	87%	70%
434	77%	82%	80%	84%	65%

Circulator continued					
Standard (minutes)	**80%**	**80%**	**80%**	**80%**	**80%**
Route	**AM Peak (1st Bus – 9am)**	**Base (9am – 2pm)**	**PM Peak (2pm – 6pm)**	**Night (6pm – last Bus)**	**Weekend All Day**
501	80%	70%	84%	89%	86%
503	87%	83%	73%	89%	89%
504	87%	89%	82%	80%	75%

Circulator – There are 38 routes: 18 TVI/EJ routes; 20 non-TVI/EJ routes. DTS will evaluate non-conforming routes with additional analysis/monitoring to identify factors affecting on-time performance for mitigation purposes.

Peak Express					
Standard (minutes)	**80%**	**80%**	**80%**	**80%**	**80%**
Route	**AM Peak (1st Bus – 9am)**	**Base (9am – 2pm)**	**PM Peak (2pm – 6pm)**	**Night (6pm – last Bus)**	**Weekend All Day**
80	91%		89%		
80A	89%		93%		
80B	89%				
81	80%		92%		
82	88%		92%		
83	95%		87%		
84	97%		80%		
84A	83%		89%		
85	93%		78%		
85A	88%		82%		
87	93%		77%		
88	90%		90%		
88A	85%		86%		
89	91%		81%		
90	93%		72%		
91	86%		84%		
92	90%		77%		
93	87%		86%		
94	81%		78%		
96	91%		84%		
97	89%		80%		
98	90%		84%		
98A	85%		78%		
99	80%		91%		
101	95%		76%		
102	87%		87%		
103	100%		77%		
PH1	84%		83%		
PH2	88%		79%		
PH3	77%		84%		
PH4	95%		85%		
PH5	83%		79%		
PH6	67%		79%		
PH7	89%		82%		
W1	81%		85%		50%

Peak Express Continued					
Standard (minutes)	**80%**	**80%**	**80%**	**80%**	**80%**
Route	**AM Peak (1st Bus – 9am)**	**Base (9am – 2pm)**	**PM Peak (2pm – 6pm)**	**Night (6pm – last Bus)**	**Weekend All Day**
W2	98%		88%		72%
W3	98%		93%		79%

Peak Express – There are 37 routes: 19 TVI/EJ routes; 18 non-TV/EJ routes. DTS will evaluate non-conforming routes with additional analysis/monitoring to identify factors affecting on-time performance for mitigation purposes.

C. Service Availability

A general measure of the distribution of routes within an agency's service area.

Standard:
Route availability within a ½ mile radius for 80% of the population.

Service availability for bus routes are detailed in the following table.

Service Availability (within a ½ mile radius of a bus route)						
Category	**Over ½ mile**	**Within ½ mile**	**Total**	**Over ½ mile**	**Within ½ mile**	**Total**
Non-TVI/EJ	64,480	599,406	663,886	10%	90%	100%
TVI/EJ	46,149	243,172	289,321	16%	84%	100%
Total	**110,629**	**842,578**	**953,207**	**12%**	**88%**	**100%**

Source: 2010 Census Data

84% of TVI/EJ and 90% of non-TVI/EJ residents are within the ½ mile radius of a bus route. Overall 88% of all residents are within the ½ mile radius of a bus route.

Service Policies

A. Transit Amenities

Items of comfort, convenience, and safety (seating, shelter, trash receptacles, lighting).

Policy:

- All amenities shall comply with ADA Accessibility Guidelines (ADAAG)
- Installation at stops along bus routes are based on number of passenger boardings, number of routes served, transfer point, headways, and space requirements.

Amenities	Stop Characteristics for Distribution
Shelter	Transfer points, two or more bus routes, headways >40 minutes, average to high proportion of passenger boardings in relation to route ridership
Bench	Transfer points, two or more bus routes, headways >30 minutes, average proportion of passenger boardings in relation to route ridership
Trash Receptacle	Transfer points, two or more bus routes, headways >15 minutes, medium to high proportion of passenger boardings in relation to route ridership and/or adjacent to trash receptacle use generator(s)
Provision of Information	As needed and appropriate

Trash receptacles, shelters, benches, and lighting were tallied for each stop along a single route. Transit amenity distribution averages for TVI/EJ and non-TVI/EJ routes for each mode are detailed in the following tables. Physical conditions and route characteristics of the service area may be a factor in determining the quantity of amenities along each route. TVI/EJ routes are highlighted in red.

Rapid Bus						
Route	No. of Stops	Trash Receptacle (%)	Shelters (%)	Benches (%)	Shelter Lighting (%)	Street Lighting (%)
A	67	94%	81%	100%	6%	91%
C	103	66%	64%	87%	1%	90%
E	60	95%	70%	100%	8%	83%

Rapid Bus – There are 3 routes: 2 TVI/EJ; 1 non-TVI/EJ routes. On average, TVI/EJ routes have more shelters and street lighting and non-TVI/EJ routes have more trash receptacles and shelter lighting shown below:

- TVI/EJ: trash receptacles (80%), shelters (72%), benches (100%), shelter lighting (3%), and street lighting (90%).
- Non-TVI/EJ: trash receptacles (95%), shelters (70%), benches (100%), shelter lighting (8%), and street lighting (83%).

Trunk						
Route	No. of Stops	Trash Receptacle (%)	Shelters (%)	Benches (%)	Shelter Lighting (%)	Street Lighting (%)
1	221	55%	43%	83%	2%	95%
1L	206	46%	46%	74%	1%	97%
2	123	85%	65%	100%	5%	92%
2L	81	84%	84%	100%	4%	94%
3	121	69%	61%	90%	3%	89%
4	131	55%	55%	89%	1%	93%
6	130	45%	45%	85%	3%	92%
9	170	69%	65%	95%	3%	89%
11	119	27%	30%	66%	2%	90%
13	141	74%	62%	100%	3%	91%
19	149	68%	62%	84%	1%	84%
20	140	71%	68%	96%	1%	88%
22	131	39%	24%	79%	1%	89%
23	149	44%	35%	84%	3%	91%
40	308	53%	55%	75%	2%	87%
42	202	79%	75%	100%	2%	92%
43	108	56%	51%	94%	2%	96%
51	208	69%	65%	86%	5%	94%
52	108	81%	81%	100%	8%	95%
53	106	55%	58%	92%	3%	97%
54	151	31%	44%	70%	1%	95%
55	405	35%	34%	64%	1%	81%
56	201	42%	43%	72%	1%	93%
57	167	39%	41%	65%	2%	73%
57A	98	53%	59%	77%	3%	82%
65	103	60%	66%	80%	3%	93%

Trunk – There are 26 routes: 9 TVI/EJ routes; 17 non-TVI/EJ routes. On average, TVI/EJ routes have more trash receptacles, shelters, benches, and shelter lighting and non-TVI/EJ routes have more street lighting as shown below:

- TVI/EJ: trash receptacles (65%), shelters (62%), benches (89%), shelter lighting (3%), and street lighting (90%).
- Non-TVI/EJ: trash receptacles (53%), shelters (49%), benches (84%), shelter lighting (2%), and street lighting (91%).

Circulator						
Route	No. of Stops	Trash Receptacle (%)	Shelters (%)	Benches (%)	Shelter Lighting (%)	Street Lighting (%)
5	61	31%	30%	61%	3%	90%
7	88	38%	28%	69%	1%	83%
8	36	94%	81%	100%	8%	86%
9S	31	32%	32%	84%	0%	90%
10	123	16%	12%	32%	0%	93%
14	172	24%	22%	50%	0%	95%
15	104	7%	11%	32%	1%	91%
16	26	23%	19%	31%	4%	65%
17	26	46%	50%	85%	4%	96%
18	54	65%	51%	91%	2%	93%
24	87	10%	38%	83%	1%	93%
31	52	38%	42%	65%	4%	79%
32	94	23%	20%	51%	1%	80%
41	62	39%	31%	77%	0%	73%
44	122	21%	25%	49%	0%	89%
70	96	20%	18%	31%	1%	72%
71	69	10%	10%	16%	1%	96%
72	58	47%	41%	81%	9%	100%
73	37	24%	35%	62%	5%	92%
74	54	9%	11%	46%	0%	93%
76	42	36%	40%	71%	2%	98%
77	97	43%	37%	60%	0%	77%
234	31	23%	19	29	0	100%
235	26	31%	23	50	0	100%
401	57	18%	21%	35%	0%	89%
402	40	10%	8%	40%	0%	78%
403	84	12%	15%	26%	0%	74%
411	52	25%	21%	69%	0%	98%
413	20	25%	15%	30%	0%	85%
414	32	19%	22%	59%	0%	100%
415	8	50%	50%	63%	0%	75%
416	25	24%	20%	28%	0%	68%
432	65	38%	35%	82%	2%	100%
433	52	48%	58%	69%	2%	100%
434	32	50%	66%	84%	3%	100%
501	34	21%	24%	26%	3%	100%
503	45	22%	22%	27%	2%	98%
504	40	5%	13%	18%	3%	100%

Circulator – There are 38 routes: 18 TVI/EJ routes; 20 non-TVI/EJ routes. On average, TVI/EJ routes have more trash receptacles and shelters and non-TVI/EJ routes have more benches, and lighting as shown below:

- TVI/EJ: trash receptacles (31%), shelters (31%), benches (54%), shelter lighting (1%), and street lighting (75%).
- Non-TVI/EJ: trash receptacles (29%), shelters (28%), benches (55%), shelter lighting (2%), and street lighting (94%).

Peak Express						
Route	No. of Stops	Trash Receptacle (%)	Shelters (%)	Benches (%)	Shelter Lighting (%)	Street Lighting (%)
80	109	38%	22%	61%	3%	97%
80A	143	27%	15%	52%	1%	98%
80B	35	49%	37%	74%	3%	94%
81	81	47%	47%	89%	2%	98%
82	63	35%	33%	73%	5%	95%
83	139	54%	52%	78%	6%	96%
84	70	49%	55%	63%	4%	94%
84A	69	52%	62%	70%	6%	94%
85	112	46%	46%	71%	2%	91%
85A	44	78%	67%	96%	4%	93%
87	85	52%	52%	76%	2%	82%
88	49	45%	45%	80%	4%	96%
88A	443	41%	41%	71%	3%	81%
89	75	39%	39%	69%	3%	67%
90	69	41%	54%	81%	3%	97%
91	55	84%	76%	100%	4%	89%
92	53	42%	43%	89%	4%	93%
93	151	45%	48%	64%	1%	82%
94	35	37%	29%	60%	3%	97%
96	36	64%	67%	83%	6%	94%
97	32	72%	66%	77%	9%	93%
98	46	65%	70%	87%	4%	93%
98A	79	89%	85%	100%	5%	94%
99	91	60%	65%	77%	9%	93%
101	59	51%	51%	78%	3%	97%
102	38	63%	61%	95%	5%	95%
103	30	80%	83%	97%	7%	93%
PH1	70	49%	49%	63%	0%	84%
PH2	76	18%	26%	28%	0%	88%
PH3	99	57%	46%	64%	5%	95%
PH4	64	31%	31%	3%	0%	92%
PH5	71	32%	41%	59%	1%	87%
PH6	126	35%	21%	57%	1%	95%
PH7	50	66%	58%	88%	0%	82%
W1	69	75%	70%	100%	1%	94%
W2	41	44%	34%	83%	0%	100%
W3	40	83%	53%	98%	5%	93%

Peak Express – There are 37 routes: 19 TVI/EJ routes; 18 non-TV/EJ routes. On average, non-TVI/EJ routes have more trash receptacles, shelters, benches, and lighting as shown below:

- TVI/EJ: trash receptacles (50%), shelters (48%), benches (75%), shelter lighting (3%), and street lighting (86%).
- Non-TVI/EJ: trash receptacles (54%), shelters (51%), benches (78%), shelter lighting (4%), and street lighting (99%).

B. Vehicle Assignment

Process by which transit vehicles are assigned to routes. All buses are wheelchair accessible and equipped with bike racks.

Policy:

Vehicles assignments are based on the operating characteristics of the routes such as ridership, mode of service, and roadway conditions (narrow, steep, tight turns). Typically, 60-foot buses are assigned to Rapid Bus, high ridership, or long-distance routes; 40-foot buses to trunk and circulator routes; and 30/35-foot buses to circulator/community access routes, routes with narrow or steep streets/tight turns, and routes with less ridership.

High floor buses are no longer manufactured and while older in age are equipped with lifts and have greater seating capacity than newer low floor buses; and are generally assigned to routes with the following characteristics:

- High ridership routes with segments that are unable to accommodate 60-foot buses.
- Unimproved right-of-ways where lifts are more conducive.
- Areas prone to ponding or flooding conditions.
- Long distance routes where the number of standees on low floor buses would have seats on a high floor bus and overall ridership is insufficient for a 60-foot.

A comparison of average vehicle age by vehicle assignments for TVI/EJ and non-TVI/EJ routes for each mode are detailed in the following tables. TVI/EJ routes are highlighted in red.

Rapid Bus				
Route	**Vehicle Size (ft)**	**No of Vehicles**	**Floor Height**	**Avg Age (Years)**
A	60	60	Low	11
C	60	51	Low	11
E	60	30	Low	11

Rapid Bus – There are 3 routes: 2 TVI/EJ; 1 non-TVI/EJ routes. All routes have an average age of 11 years. 60-foot vehicles are assigned to Rapid Bus routes because they have high ridership, connect outlying suburban areas to the primary urban core, and operate on heavily traveled corridors frequently throughout the day.

Trunk				
Route	Vehicle Size (ft)	No of Vehicles	Floor Height	Avg Age (Years)
1	60	53	Low	9
1L	60	28	Low	9
2	60	77	Low	9
2L	60	20	Low	9
3	40	55	High/Low	14
4	40	38	High/Low	9
6	40	30	High/Low	14
9	40	38	High/Low	14
11	40	16	High/Low	9
13	40	54	High/Low	14
19	40	41	Low	8
20	40	19	Low	9
22	40	10	Low	11
23	40	6	Low	11
40	40	70	High	16
42	60	45	Low	11
43	40	26	High/Low	14
51	40	44	High/Low	7
52	40	36	High/Low	7
53	40	21	Low	5
54	40	29	Low	11
55	40	61	Low	5
56	40	32	Low	11
57	40	41	Low	11
57A	40	5	Low	11
65	40	18	High/Low	5

Trunk – There are 26 routes: 9 TVI/EJ routes; 17 non-TVI/EJ routes. TVI/EJ routes have an average age of 9 years and non-TVI/EJ routes have an average age of 10 years.

40-foot vehicles are typically assigned to Trunk routes, with the exception of routes 1, 1L, 2, 2L, and 42 which operate long distances along heavily traveled corridors, have high ridership, and are assigned 60-foot vehicles.

Routes with characteristics better suited for high floor buses are assigned such vehicles. (i.e. Routes 13 & 40 are long distance, high ridership routes but have segments that are unable to accommodate a 60-foot vehicle).

Circulator				
Route	Vehicle Size (ft)	No of Vehicles	Floor Height	Avg Age (Years)
5	40	5	Low	11
7	40	17	High/Low	14
8	40	29	High/Low	9
9S	40	4	High	11
10	30	10	High	17
14	35	9	Low	8
15	30	8	High	17
16	35	3	Low	8
17	40	7	High/Low	12
18	40	4	Low	8
24	40	6	Low	8
31	40	6	Low	8
32	35	13	Low	8
41	40	14	Low	6
44	40	11	High/Low	7
70	30	4	High	17
71	30	3	Low	10
72	35	4	Low	8
73	40	5	Low	5
74	30	3	High	17
76	35	5	Low	8
77	40	4	Low	11
234	30/35	3	High/Low	8
235	30/35	2	High/Low	8
401	40	8	Low	5
402	40	8	Low	5
403	40	8	Low	5
411	35/40	9	Low	5
413	35/40	3	Low	5
414	30	8	Low	10
415	30/40	3	Low	5
416	30	8	Low	10
432	40	8	Low	5
433	40	5	Low	5
434	40	4	Low	5
501	35	4	Low	8
503	30	4	High	17
504	35	4	Low	8

Circulator – There are 38 routes: 18 TVI/EJ routes; 20 non-TVI/EJ routes. TVI/EJ routes have an average age of 7 years and non-TVI/EJ routes have an average age of 10 years.

30, 35, and 40-foot vehicles are generally assigned to Circulator routes which travel through neighborhoods. Assignments are based on route characteristics such as ridership, roadway conditions, and distance.

Routes with characteristics better suited for high floor buses are assigned such vehicles. (i.e. Route 7 is a high ridership route with unimproved right-of-ways.)

Peak Express				
Route	Vehicle Size (ft)	No of Vehicles	Floor Height	Avg Age (Years)
80	40	12	High/Low	12
80A	40	6	High/Low	13
80B	40	1	Low	5
81	40/60	23	Low	13
82	40	17	Low	14
83	40	9	Low	5
84	40	9	Low	5
84A	40	11	High	16
85	40	8	Low	11
85A	5	40	High	14
87	40	7	Low	9
88	40	7	Low	5
88A	40	5	High	14
89	40	5	High	14
90	40	4	Low	5
91	40/60	22	High/Low	13
92	40	7	Low	5
93	40	31	High	16
94	40	2	High	21
96	40	5	Low	5
97	40	9	High	14
98	40	9	High	14
98A	40	6	High	14
99	40	3	Low	5
101	40/60	12	High/Low	13
102	40	8	Low	5
103	40	5	Low	11
PH1	40	2	Low	6
PH2	40	2	Low	6
PH3	40	2	Low	6
PH4	40	2	Low	11
PH5	40	2	Low	11
PH6	40	2	Low	9
PH7	40	2	Low	6
W1	40	9	High	11
W2	40	7	Low	6
W3	40	5	Low	11

Peak Express – There are 37 routes: 19 TVI/EJ routes; 18 non-TV/EJ routes. TVI/EJ routes have an average age of 9 years and non-TVI/EJ routes have an average age of 11 years.

40-foot vehicles are generally assigned to Peak Express routes, with the exception of routes 81, 91, and 101 which are also assigned 60-foot vehicles due to higher ridership than other Peak Express routes.

Routes with characteristics better suited for high floor buses are assigned such vehicles. (i.e. Route 88A serves the Northshore and Windward Coastline with unimproved right-of-ways and prone to flooding; Route 93 has high ridership but a segment of the route is unable to accommodate a 60-foot vehicle.)

Attachment 8

Major Service and Fare Change Policy and Disparate Impact & Disproportionate Burden Policies

CATEGORY: ADMINISTRATION	Index Code: 7-1.13 Page 1 of 5

SUBJECT: DTS Major Service & Fare Change Policy and Disparate Impact & Disproportionate Burden Policies

REFERENCE: FTA C 4702.1B, Title VI Requirements & Guidelines for Federal Transit Administration (FTA) Recipients (or current version); Comprehensive Review Guide for Triennial and State Management Reviews (current FY)

PURPOSE: To establish policies and procedures to evaluate all major service and fare changes as required under the FTA Title VI (TVI) Circular 4702.1B and any subsequent revisions thereto. In order to comply with FTA requirements, DTS-PTD is required to develop and adopt Major Service Change, Fare Change, Disparate Impact, and Disproportionate Burden Policies and Procedures to evaluate the impact on minority and low-income populations.

POLICIES:
The DTS-PTD shall conduct service and fare equity analyses during the planning process to determine whether the adverse effects of major planned changes will have a disparate impact on minority populations on the basis of race, color, or national origin and/or a disproportionate burden on low-income populations. Adverse effects of major changes are measured by the change between existing and proposed service/fare levels that would be deemed significant, including but not limited to new service, reductions in trips/service hours, increases in fares/headways, and elimination of routes/route segments/bus stops.

1. Major Service Change Policy
   All "major" service changes will require a Service Equity Analysis for Title VI purposes during the planning process prior to implementation. Service change proposals that do not meet the criteria for "major" will be subject to an appropriate level of public review and comment. The combined effect of two or more service changes affecting the same route or community within a twelve month period or over four successive quarters and exceeds the disparate impact/disproportionate burden thresholds established in Item Nos. 3 and 4 below will be subject to a service equity analysis.

   The following are considered "major" service changes:
   - Establishing new routes when the population within a ½ mile radius of the proposed route exceeds 25% of the service area population (Census blocks).
   - Changing service levels (ie: trips, service hours/miles, span of service, headways) for existing routes when ridership of the affected route exceeds 10% of system-wide ridership.

- Eliminating route(s) when the affected ridership is greater than ten (10) passengers and the percentage of affected ridership exceeds 10% of system-wide ridership. (No major service change will be considered if similar alternate service is available on another existing route.)
- Eliminating route segments when the affected ridership of the eliminated segment exceeds 10% of the route's total ridership.
- Temporary service addition or change lasting longer than twelve months.

The following service changes are not considered "major" and do not require Service Equity Analyses.

- Special event service;
- Routing changes due to construction or other road closures; and
- Special service operated during emergencies.

2. Fare Change Policy

All fare changes (increase, decrease), except the following, will require a Fare Equity Analysis for Title VI purposes during the planning process and prior to implementation.

- Special event, such as instances when fare-free has been declared for all passengers.
- Temporary fare reductions that are mitigating measures for other actions, such as construction activities closing a segment of a rail system for a period of time, requiring passengers to alter their travel patterns. A reduced fare for these passengers is a mitigating measure.
- Promotional fare reductions lasting less than six (6) months.

3. Disparate Impact Policy

As defined by FTA:

"Disparate impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks substantial legitimate justification and where there exists one or more alternatives that would service the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

The policy shall establish a threshold for determining when adverse effects of fare/service changes are borne disproportionately by minority populations. The disparate impact defines statistically significant disparity and may be presented as a statistical percentage of impacts

borne by minority populations compared to impacts borne by non-minority populations. The disparate impact threshold must be applied uniformly... and cannot be altered until the next Title VI Program submission."

DTS-PTD determines disparate impact when adverse effects of major service and/or fare changes disproportionately affects minority populations based on race, color, or national origin more than non-minority populations.

A "disparate impact" occurs when the threshold for determining adverse effects of planned changes on minority populations exceeds a 10% difference between the proportion of the total minority and non-minority population or ridership and the proportion of the affected minority and non-minority population or ridership.

4. Disproportionate Burden Policy
   As defined by FTA in Circular 4702.1B:
   "Disproportionate burden refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate where practicable.

   The policy shall establish a threshold for determining when adverse effects of service or fare changes are borne disproportionately by low-income populations. The disproportionate burden threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by low-income populations as compared to impacts borne by non-low-income populations. The disproportionate burden threshold must be applied uniformly... and cannot by altered until the next Title VI Program submission."

   DTS-PTD determines disproportionate burden when adverse effects of major service and/or fare changes disproportionately affects low-income populations more than non-low-income populations.

   A "disproportionate burden" occurs when the threshold for determining adverse effects of planned changes on low-income populations exceeds a 10% difference between the proportion of the total low-income and non-low-income population or ridership and the proportion of the affected low-income and non-low-income population or ridership.

PROCEDURES:

1. Six months prior to approving or implementing any planned changes, DTS-PTD will evaluate the impacts of the change(s) on minority and/or

low-income populations by conducting a service and/or fare equity analysis to determine if the adverse effects have a disparate impact or disproportionate burden. For service equity analyses, minority and low-income populations within ½ mile radius of the affected service area are determined using the most current available Census block group data. The fare equity analysis will use fare media data from ridership surveys conducted within the previous 5-year period.

2. Proposed service changes are submitted to DTS-PTD Service Review Committee for review and approval. Service changes are typically implemented on a quarterly basis in March, June, August, and December.

3. If the equity analysis determines that there is no disparate impact to the affected minority population and/or no disproportionate burden to the affected low-income population, DTS-PTD will continue the planning/implementation process of the proposed change. The process will include coordination with council member(s) from the district(s) affected by change(s) and presentation to the public for comments. Results will included in the TVI Program submitted to FTA every three years.

4. If the equity analysis determines that there is a disparate impact to the affected minority population and/or a disproportionate burden to the affected low-income population, DTS-PTD will review/revise planned changes to avoid, minimize, or mitigate such impacts and conduct another equity analysis on the revised changes to determine that the revised changes do not disproportionately affect minority and/or low-income populations more than non-minority and/or non-low-income populations. Potential adverse effects to minority and/or low-income populations include but not limited to: service changes that reduce service (i.e. eliminate route(s) or segments of routes, remove trips on a route, change span of service), change the frequency of service (i.e. headway), or fare increases.

5. If DTS-PTD chooses not to alter the proposed changes despite the potential disparate impact and/or a disproportionate burden on minority/low-income populations, or if DTS-PTD finds, even after revisions, that minority/low-income riders will continue to bear a disproportionate share of the proposed changes, the change may be implemented only if:
    1. there is a substantial legitimate justification for the proposed change, **and**
    2. it can be demonstrated that there are no alternatives that would have a less disparate impact on minority/low-income riders but would still accomplish legitimate program goals.

SUBJECT: DTS Major Service & Fare Change Policy and Disparate Impact & Disproportionate Burden Policies

In order to make this choice, DTS-PTD must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on minorities/low-income riders, and then implement the least discriminatory alternative.

PUBLIC ENGAGEMENT PROCESS:

See Public Participation for Changes in Public Transit Policy, Programs, Projects, Service, and Operations procedures (Index Code: 7-1.19) for identifying methods of engaging the public in the decision making process for any transportation plan, program, or activity. This applies when implementing major and minor service changes, fare changes, construction, development of policy thresholds, procedures, any future revision(s) or amendments(s), and is applicable to all sub-recipients.

ADOPTED:

WES FRYSZTACKI

Amendment 2

Date 4·2·2019

Attachment 9

Major Service and Fare Change Equity Analyses

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

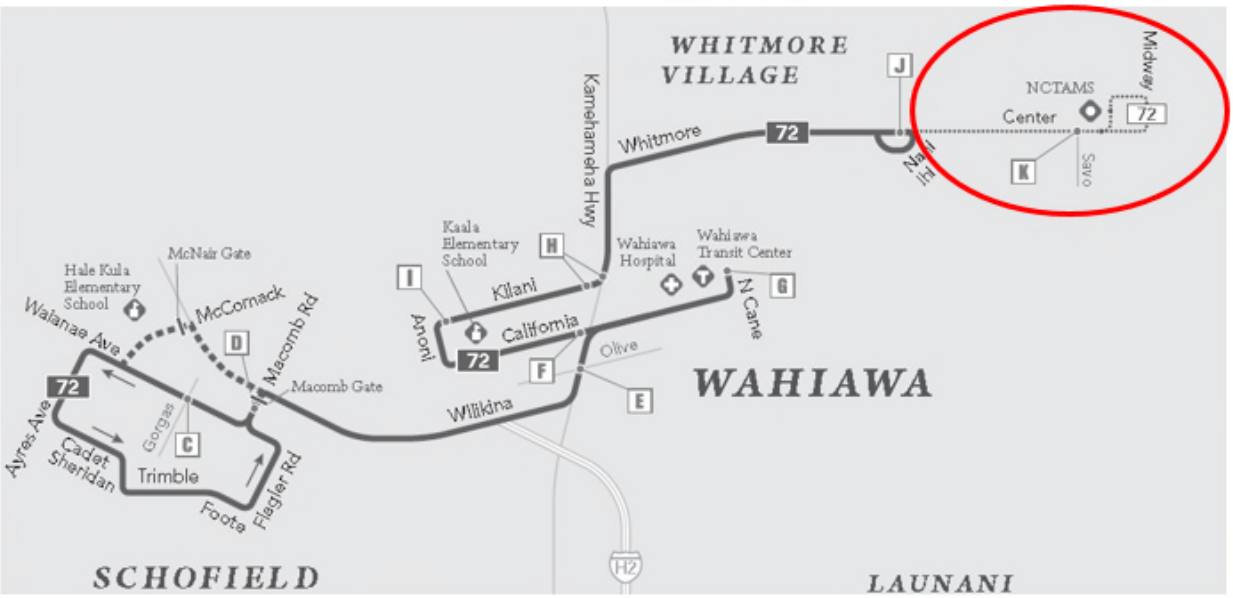
Route 72: Continued low ridership for the Naval Computer and Telecommunications Area Master Station Pacific (NCTAMS) segment is the basis for the proposed elimination of this route segment. It was initiated in the summer of 2015 when NCTAMS notified DTS of an upcoming construction project affecting entry 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.

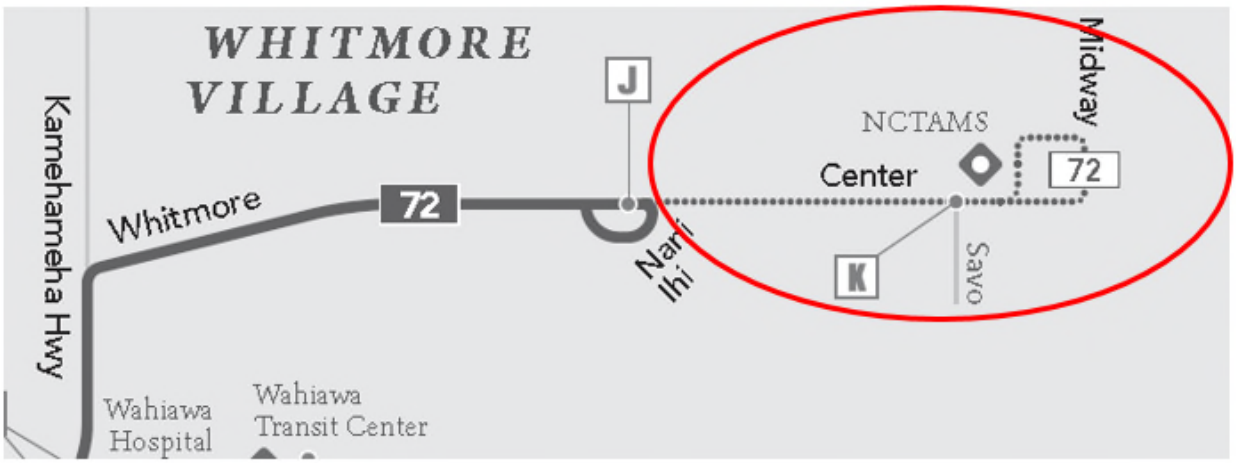
Historically, TheBus service for NCTAMS was eliminated in mid-2000 when construction precluded bus operations; ridership at that time was also very low, and service to NCTAMS was not restored when construction was completed. In 2006 limited service was restored at the request of then NCTAMS Commanding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





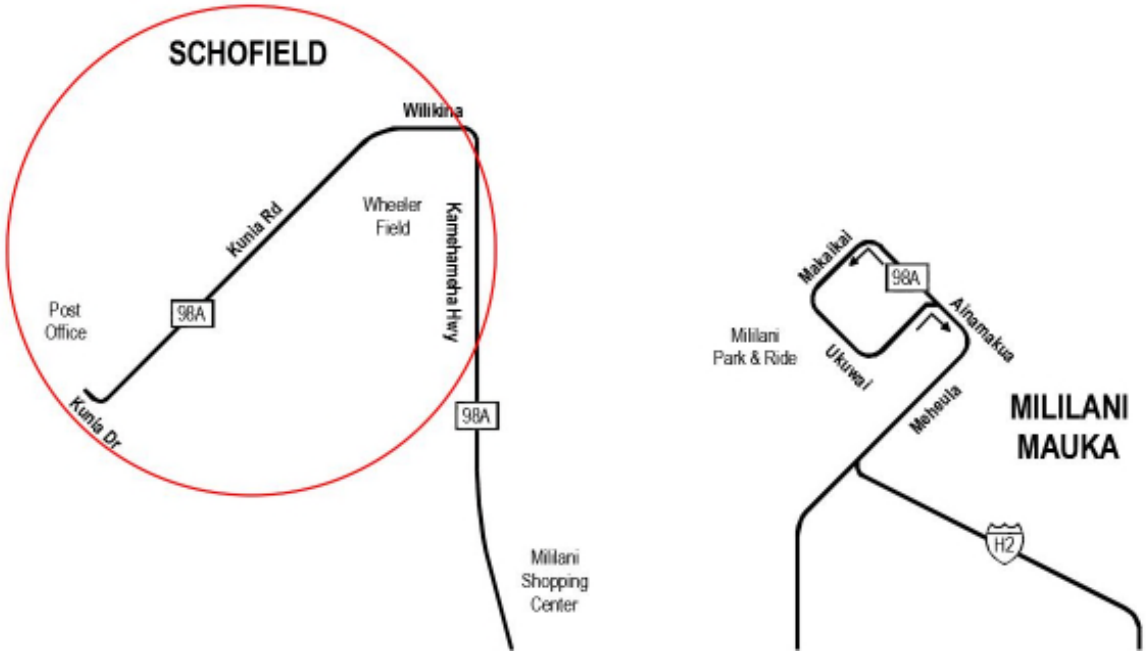
Route 98A: Continued low ridership for the Kunia Village segment between Kunia Village and the Wahiawa Park and Ride is the basis for the proposed elimination of this route segment.

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%.

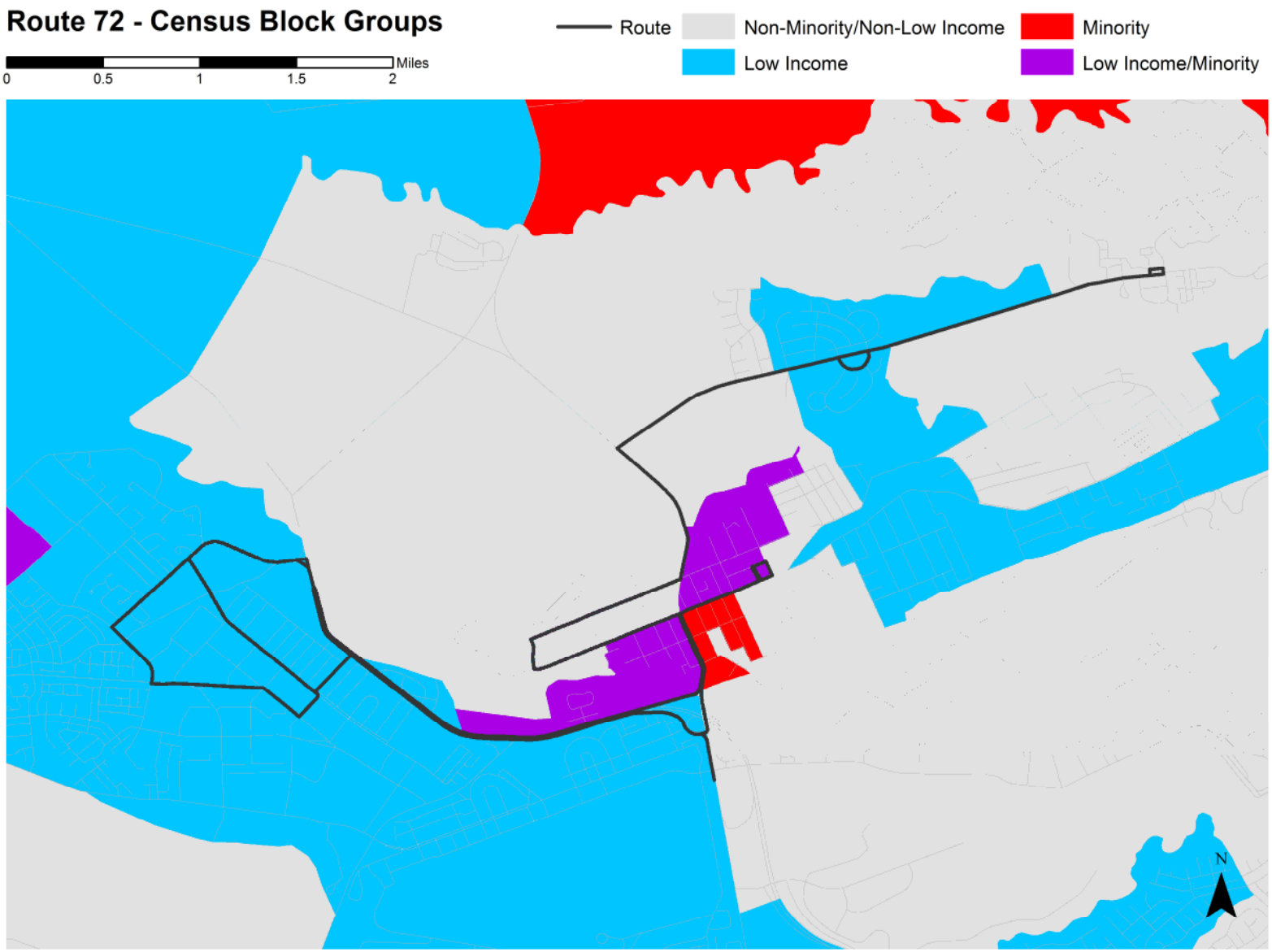
Disproportionate Burden: As shown in Table 2 above, while the effects of the service change to Routes 72 and 98A do not exceed the disproportionate burden policy threshold of

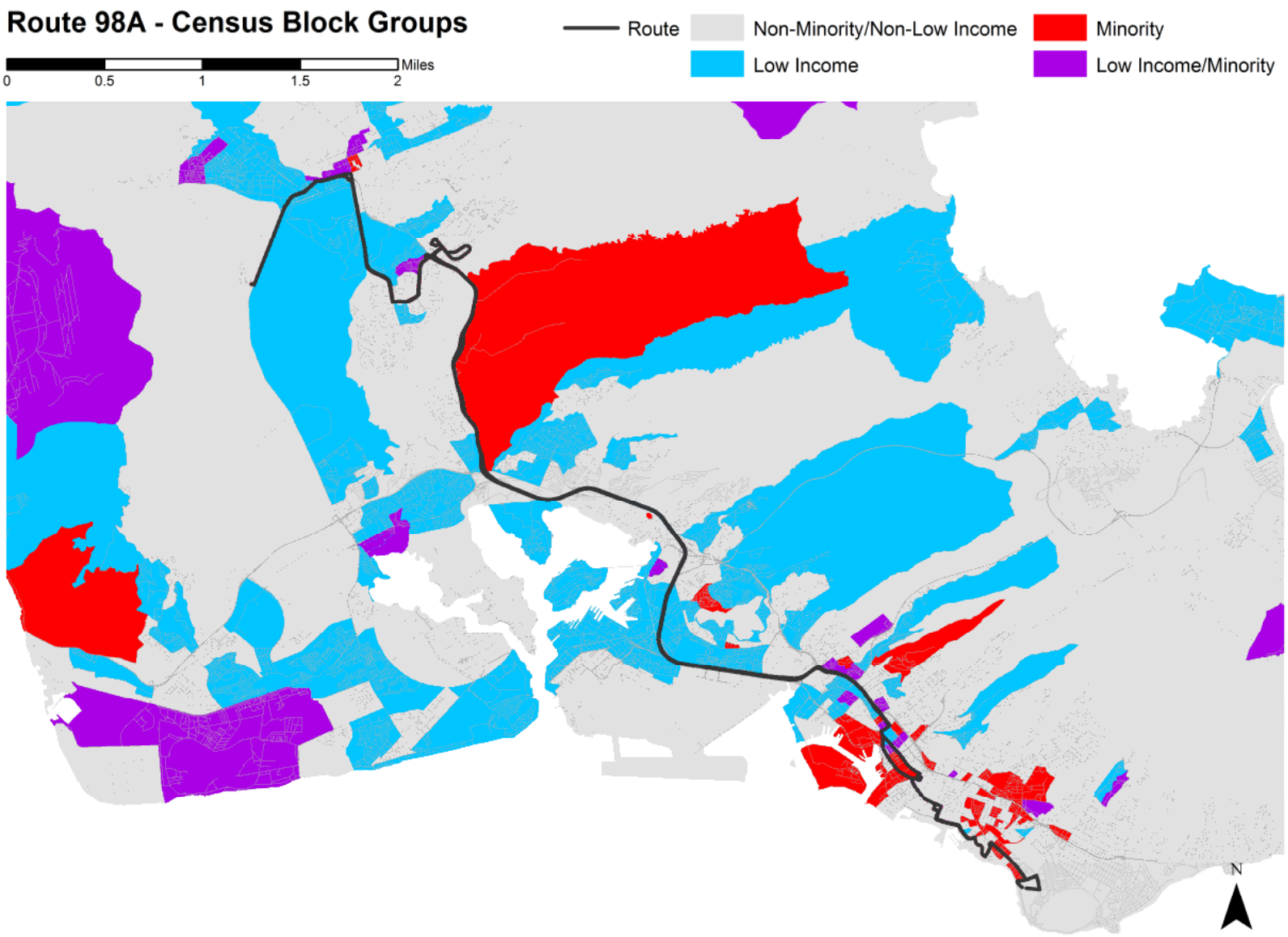
10%, the affected low income population for both routes will be impacted more than the low income population of the total service area. Route 72 is 5% more and 98A is 8%.

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
Non-Minority/Non-Low Income
Minority
Low Income
Low Income/Minority
0
0.5
1
1.5
2
Miles
N


Route 98A - Census Block Groups
Route
Non-Minority/Non-Low Income
Minority
Low Income
Low Income/Minority
0
0.5
1
1.5
2
Miles
N

Department of Transportation Services (DTS)
Public Transit Division Title VI Program
Fare Change Equity Analysis
Replace Paper Transfer with 1-Day Pass.

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 fare changes at the planning and programming stages to determine whether those changes have a disparate impact on minority populations and disproportionate burden on low-income populations. This report is the fare equity analysis for replacing paper transfers with 1-day passes.

Background

The Honolulu City Council (Council) sets public transit fare rates by amending the Revised Ordinances of Honolulu (ROH), Chapter 13. Public Transit, Article 2. Island Wide Fare Structure, Section 13-2.1(b) Fare Structure Table.

In September 2015, Council introduced Bill 69 (2015) to discontinue paper transfers and replace it with a 1-day bus pass valid for an unlimited number of bus rides throughout the day. While it passed 1st and 2nd readings in October and November 2015, no further action was taken by Council. In January 2017, pending Bill 69 (2015) was re-referred for Council action and passed 3rd reading. In June 2017, DTS, through a contractor, conducted a rider survey of adult transfer use to determine the minority and low-income proportions.

Currently, paper transfers are provided only to passengers who pay the single cash fare (Section 13-2.1(e), ROH). Cash paying passengers are given transfers upon request at the time of boarding. Transfers are valid for up to two unidirectional connections within a 2-hour period of boarding the 1st bus and are not valid for return or round trips.

The following is the basis for DTS support of Bill 69 (2015).

- A recent survey of 26 major transit systems found that 20 (77%) of those 26 systems have implemented 1-day passes.

- A small percentage of passengers would be negatively affected by the elimination of the paper transfer. For FY17, approximately 7% of the annual system-wide unlinked passenger trips were made using transfers.

- Less misuse of paper transfers: Currently, since unidirectional transfer connections are allowed not regarding direction of travel, it is impossible to prevent riders from using free paper transfers after paying single cash fare to complete the second "ride-back" return portion of a round-trip. Passengers with a valid paper transfer can easily evade payment of the single cash fare for their return trip, resulting in ongoing system revenue losses.

- More efficient, expedited operations: Passengers using the 1-day pass will contribute to faster boarding at bus stops and reduce the time buses dwell at each stop.

- Simpler for bus operators to issue and verify; more emphasis on safety while driving: With the 1-day pass, bus operators do not need to constantly adjust the paper transfer ticket booklet to issue the proper expiration time, indicated by the tear-off ticket.

- Less driver and passenger conflicts over expired paper transfers: The 1-day pass eliminates frequent driver-passenger fare disputes over paper transfers, which can escalate and trigger verbal and physical altercations that may result in delaying service for response by road supervisors and/or law enforcement. Delaying service is very disruptive and inconvenient for the other passengers.

- Increased transit use and passenger convenience: The 1-day pass allows unlimited boardings during the course of a service day (12:00 a.m. to 2:59 a.m. the following day), allowing passengers the ability to increase their utilization of transit to make many extra trips for a similar roundtrip cost.

- Can be fully integrated into upcoming next-generation fare collection and smart card system: The 1-day pass can be vended and assigned to the upcoming transit smart card system at rail and bus ticket vending machines, participating fare vendors, and online.

Public Engagement Process

September 2015: Public notification that 1st reading of Bill 69 (2015) is scheduled for Council's regular meeting on 10/7/15.

October 2015: 3 individuals provide comments (no specifics provided in minutes) at the 1st reading of Bill 69 (2015) and it was passed by Council. Public notification that Bill 69 (2015) is on the agenda for Council's Committee on Budget meeting on 10/21/17. Per Budget Committee report no. 409: 1 individual opposed, 1 individual provided comments (no specifics provided in minutes), no written testimonies received, DTS Director and President of Oahu Transit Services Inc. (City's bus service contractor) testified in support but also expressed concerns that a small percentage of riders would be negatively affected, and Bill 69 was voted out of committee and scheduled for 2nd reading and public hearing at Council's regular meeting on 11/4/17.

November 2015: Per 2nd reading/public hearing minutes, 4 individuals provided comments (no specifics provided in minutes), Councilmember who introduced Bill 69 indicated that further discussion was needed for refinement, Committee Report no. 409 was adopted, and Bill 69 (2015) passed second reading.

December 2015 –
December 2016: No further action on Bill 69 (2015).

January 2017: Bill 69 (2015) is re-referred to Committee on Budget for further action and public notification that it is on the agenda for the Committee's meeting on 01/11/17. Per the minutes of this meeting, Committee Report no. 23 indicated the amended version of Bill 69 (2015) was circulated, DTS Director testified and submitted written testimony in support of the amended version, 4 individuals testified with comments (no specifics provided in minutes), and Bill 69 (2015) amended was voted out of Committee for 3rd and final reading at Council's regular meeting on 01/25/17 - public notification of meeting agenda issued. Per 3rd reading minutes, Committee Report no. 23 was adopted, 2 individuals opposed, DTS Director testified in support, and Council passed Bill 69 (2015) amended.

February 2017: Mayor approves Bill 69 (2015) amended. Implementation is scheduled for October 2017.

February –
July 2017: Mayor's press release on Bill 69 (2015) and various media reports that 1-day pass is replacing the paper transfer.

August 2017: DTS initiates 1-day pass/paper transfer public notification effort. All Neighborhood Boards are informed and requested to disseminate the information to their communities.

September 2017: Notification goes out through DTS website, TheBus website; Rider Alerts, signage, fare decals, onboard announcements, car cards, and City press release. Flyers are sent to One-Way Ticket purchasers, Department of Education and Hawaii Association of Independent Schools Middle and High Schools.

October 2017: Scheduled implementation of 1-day pass and discontinuing paper transfer.

Public Response: 2-3 individuals attended Council meetings and 4 attended the public hearing (usually attended by the same individuals). Less than 100 comments were received from the public, with about 60 opposing the fare change.

Title VI Program Policies

DTS' 2016 Title VI Program contains the policies and procedures to determine if the implementation of the 1-day pass and discontinuing paper transfers will have a disparate impact to minority populations and disproportionate burden to low income populations. A survey of adult riders using transfers determined the minority and low-income proportions of riders affected by discontinuing the paper transfer and implementing the 1-day pass. Although youth riders also use transfers, this group was inadvertently not included in the survey.

Fare Change Policy: As a fare change, replacing paper transfers with1-day bus passes requires DTS to perform a fare equity analysis during the planning process and 6 months prior to approval/adoption by the Honolulu City Council and subsequent implementation.

Disparate Impact Policy: DTS determines disparate impact when adverse effects of a fare change affects minority populations disproportionately more than non-minority populations.

Disproportionate Burden Policy: DTS determines disproportionate burden when adverse effects of a fare change affects low income populations disproportionately more than non-low income populations.

Analysis Framework

Replacing paper transfers with the 1-day pass adversely affects single cash fare passengers who only need to take 1 bus trip in a day that requires a transfer to another route to complete the trip. While there is no change to the cost of the single cash fare, the 1-day bus pass will be priced at no less than twice the cost of a single cash fare, currently at $2.50. According to current statute (Section 13-2.1(e), ROH), paper transfers are provided only to passengers who pay the single cash fare. Per current policy, cash paying passengers are given transfers upon request at the time of boarding, transfers are valid for up to two unidirectional connections within a 2-hour period of boarding the 1st bus (for outlying area travel) and are not valid for return or round trips.

According to Oahu Transit Services, Inc. report, Bus Operations Passenger Composition and Revenue for the 12 months ending 6/30/17 (FY17), transfers were used for 7.2% of system-wide unlinked passenger trips, while single cash fare was used for 14.3% of system-wide unlinked passenger trips. Since transfers are only given to single cash fare passengers, the 7.2% transfer use represents a 50% maximum proportion of single cash fare unlinked passenger trips that may be adversely affected by discontinuing the free paper transfers since there is no adverse impact to single cash fare passengers who take 2 or more trips in a day.

Table 1: Percent of FY17 Total Unlinked Passenger Trips for Single Cash Fare & Transfer

Fare Media	Single Cash Fare	Paper Transfer	1-day Pass
Cost	2.50 (no change)	Free	$5 (2x single cash fare)
% of total annual unlinked passenger trips	14.3%	7.2%	N/A

Methodology:

2017 rider survey data was used to determine minority and low-income proportions for fare payment categories adult cash and adult paper transfer. Although, single cash fare youth riders also use transfers, this group was inadvertently not included in the survey. A rider demographic survey is scheduled for FY19 and will include all fare media usage.

According to the survey of adult cash riders, 62% requested/used a transfer, 64% self-identified as minority, and 23% self-identified as low income. Of the 62% who requested or used a transfer, 70% self-identified as minority and 26% as low income.

Table 2: Transfer, Minority, Low Income Percentage of Adult Cash Fare Riders

Survey of Adult Cash Riders	Use/Request Transfer	Minority	Low Income
% of total adult cash riders	62%	64%	23%
% of total adult cash riders-transfers		70%	26%

<u>Assessing Impacts</u>

Disparate Impact: Single cash fare passengers who take only 1 trip in a day who requires a paper transfer to complete the one-way trip are most likely to be adversely impacted by the 1-day pass fare change. Based on the survey, 70% of transfer users self-identified as minority, therefore minority riders are disproportionately impacted by this fare change more than non-minority riders.

According to DTS' TVI Policies, if minority passengers will continue to be disproportionately impacted, the fare change may be implemented only if there is substantial legitimate justification for the proposed change, and it can be demonstrated that there are no other alternatives that would have a less disparate impact on minority passengers but would still accomplish legitimate program goals.

Disproportionate Burden: Single cash fare passengers who take only 1 trip in a day who require a paper transfer to complete the one way trip are most likely to be adversely impacted by the 1-day pass fare change. Based on the survey, 26% of transfer users self-identified as low-income, therefore, low income riders are not disproportionately impacted by this fare change more than non-low-income riders.

Fare Equity Analysis: While there is no disproportionate burden to low income riders from this fare change, disparate impact to minority riders exists. Based on the misuse and operational issues associated with paper transfers, the small percentage of total system-wide unlinked passenger trips affected by this fare change, the lack of widespread public opposition, and the benefits of the 1-day pass providing unlimited

rides until 2:59 a.m. the next day, as well as facilitating bus operations, DTS supported and Council passed Bill 69 (2015) amended to replace paper transfers with the 1-day bus pass.

Due to the majority minority of Honolulu's population, aside from not discontinuing paper transfers, there are no other alternatives that would have a less disparate impact on minority passengers. While the survey did not include data on how many transfer trips single cash fare passengers take in a day (no adverse impact for 2 or more single cash fare trips in a day), it is likely that the adversely affected percentage would be much less than the 7.2% shown in Table 1.

Current single cash fare passengers will benefit by the increased travel opportunities provided by the 1-day bus pass, valid for unlimited rides until 2:59 a.m. the next day, especially those who live in outlying areas with longer commutes and more transfers to reach destinations. Since bus fares are not time or distance-based, the cost benefit is greater for these riders. According to DTS' 2016 Title VI Program report, a majority of the minority and low-income Census block groups are located outside of urban Honolulu in outlying communities, as such the 1-day pass increases transit mobility for these communities.

Department of Transportation Services (DTS)
Public Transit Division Title VI Program
Fare Change Equity Analysis
January 1, 2018: Fare Increase

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 fare changes at the planning and programming stages to determine whether those changes have a disparate impact on minority populations and disproportionate burden on low income populations.

This report is the fare equity analysis of the proposed fare increases to adult, one-day, youth, senior, and disability passes; and adult cash single fare. Implementation is scheduled for January 1, 2018.

Background

The Honolulu City Council (Council) sets public transit fare rates by amending the Revised Ordinances of Honolulu (ROH), Chapter 13. Public Transit, Article 2. Island Wide Fare Structure, Section 13-2.1(b) Fare Structure Table. In January 2001, Council Resolution No. 00-29 CD-1 was passed and established a policy on funding the operating cost of the City and County of Honolulu (City) bus system. According to Resolution No. 00-29 CD-1, bus fares shall be adjusted so the fare box recovery ratio does not fall below 27% nor exceed 33%.

During the preparation of the FY18 operating budget, DTS in coordination with the City's Department of Budget and Fiscal Services (BFS) reviewed the fare box recovery ratio and based on the current trend of declining ridership, estimated that the FY17 fare box recovery ratio would just meet the minimum 27% level. For the period of July 1 to December 31, 2016, unlinked passenger trips and bus fare revenue declined 3% and 4% respectively from the same period in 2015, while bus operating costs increased 4%.

Ridership (unlinked passenger trips) has progressively declined since 2014 contributing to decreased fare revenue, whereas the cost to operate and maintain the bus system has been increasing, attributable in part to raises in collective bargaining salaries and fringe benefits. Between FY14 and FY16, unlinked passenger trips and fare revenue declined by 6% and 3% respectively; and bus operating costs increased by 4%. (Oahu Transit Services (OTS) FY14 - FY16 Bus Operations Passenger Composition & Revenue reports and Statement of Revenue & Expense reports)

To address the budgetary issues with the fare box recovery ratio, discussions ensued between DTS and BFS on whether to raise bus fares to increase fare revenue or cut bus service to decrease bus operating expenses.

Bus fares have not changed in the last 8 years and were last increased in 2010, costs to operate and maintain bus service continue to rise while fare revenue and ridership have been declining. In 2012, instead of implementing another fare increase, major service cuts were made to mitigate revenue shortfalls in the bus service operating budget; it elicited widespread public outcry resulting in the restoration of most of the service cuts; overwhelming public sentiment was to increase fares instead of cutting service, especially the deeply discounted senior pass, in fact many seniors commented that they were willing to pay more in lieu of cutting service.

Based on the above, DTS and BFS proposed fare increases and in early March 2017 the Mayor's City FY18 operating budget submission to Council included a draft revenue bill to amend the Island Wide Fare Structure with the proposed fare increases to mitigate anticipated fare revenue shortfalls in DTS' FY18 operating budget. Increases affected adult, one-day, youth, senior, and disability passes; and adult cash single fare.

Although, increases to para-transit fares were also proposed, a fare equity analysis is not required for fare changes to demand/response service and is not included in this report.

Public Engagement Process

March 2017: Public notification that the 1st reading of Bill 28 (2017) proposing fare increases is scheduled for Council's regular meeting on 3/22/17. Per meeting minutes, 4 para-transit riders commented on the fare increases for demand/response service and there was no indication of comments related to the bus fare increases. While Bill 28 (2017) passed 1st reading with 5 ayes/4 noes, opposing Councilmembers had reservations regarding the para-transit fare increases, not the bus fare increases.

April 2017: Public notification that Bill 28 (2017) is on the agenda for Council's Committee on Budget meeting on 4/5/17. Per meeting minutes and Committee Report No. 122, DTS Director responded to para-transit fare questions, 5 individuals testified (1 support/1 oppose/3 comments), 4 written testimonies (1 oppose bus/2 oppose para-transit/1 oppose both), and Bill 28 (2017) was voted out of committee and scheduled for 2nd reading and public hearing at Council's regular meeting on 4/26/17. Discussion and testimonies focused on the para-transit fare increases.

Public notification that 2nd reading and public hearing for Bill 28 (2017) proposing fare increases are scheduled for Council's regular meeting on 4/26/17. Per meeting minutes, 11 individuals testified (6 oppose, 5 comments), 8 written testimonies (1 support/6 oppose para-transit/1 oppose bus & para-transit); DTS Director responded to questions from Council and in regards to the bus fare increases stated that current fare box ratio is 27%, should the City fall below that threshold an adverse consequence would be the elimination of routes unless another revenue source is found, and should

the measure not pass there would be a reduction of existing services. Due to concerns related to the para-transit fare increases, Council proposed to amend Bill 28 (2017). Committee Report No. 122 was adopted and Bill 28 (2017) passed 2nd reading.

May 2017: Public notification that proposed Council Draft 1 (CD1) to Bill 28 (2017) is on the agenda for Council's Committee on Budget meeting on 5/16/17 – continuance of meeting was held on 5/17/17. Per 5/16/17 meeting minutes, Council discussed CD1 amendments, DTS Director responded to para-transit fare questions, 10 individuals testified on 5/16/17 (4 oppose, 6 comments), 7 written testimonies (5 oppose para-transit/2 oppose bus), and Bill 28 (2017) was amended to CD1, reported out of Committee for 3rd reading at Council's regular meeting on 6/7/17. Per minutes of special reconvened meeting on 5/17/17 and Committee Report No. 204, Council proposed another amendment to Bill 28 (2017) CD1 to delete the para-transit fare increases, DTS Director commented on this deletion, 2 para-transit riders testified in support of the proposed amendment, and the amended Bill 28 (2017) CD1 was voted out of committee and scheduled for 3rd reading at Council's regular meeting on 6/7/17.

Public notification that 3rd reading of amended Bill 28 (2017) CD1 to increase only bus fares is on the agenda for Council's regular meeting on 6/7/17

June 2017: Per minutes of Council's 6/7/17 meeting, DTS Director submitted written testimony to retain the para-transit fare increases as originally proposed and add a para-transit fare subsidy for low income riders (no Council action taken) and 4 individuals testified on the bus fare increases (1 support, 2 oppose, 1 comment). Council adopts Committee Report No. 204 and passes amended Bill 28 (2017) CD1 to increase bus fares on 3rd reading. Mayor approves Bill 28 (2017) CD1 on 6/28/17 to increase bus fares effective 01/01/18.

July 2017: DTS initiates public notification effort for the bus fare increases. All Neighborhood Boards are informed and requested to disseminate the information to their communities.

August to December 2017: Notification goes out through the DTS website, TheBus website, Rider Alerts, car cards, flyers/brochures/timetables/system map, signage, news media (television and articles), onboard announcements, press conference and press release, and fare decals.

January 2018: Fare increase is scheduled to take effect.

Public Response: Approximately 20 individuals attended the various Council meetings (usually attended by the same individuals) and 11 individuals attended the public hearing; very few comments/opposition were made on the bus fare increases, most were focused on the para-transit fare increases. During the public outreach period, less than 30 comments/opposition were received from the public.

Title VI Policies

DTS' Title VI Program contains the policies and procedures to determine if the proposed fare changes will have a disparate impact to minority populations and disproportionate burden to low income populations. At this time, ridership data is not available to determine the minority, low income, and overall proportions of ridership for the affected fare types. A rider demographic survey is scheduled for FY19 and will include usage of all fare types.

Fare Change Policy: All fare changes (increase or decrease) requires DTS to perform a fare equity analysis during the planning process prior to approval/adoption by Council and subsequent implementation.

Disparate Impact Policy: DTS determines disparate impact when adverse effects of a fare change disproportionately affects minority populations more than non-minority populations.

Disproportionate Burden Policy: DTS determines disproportionate burden when adverse effects of a fare change disproportionately affects low income populations more than non-low income populations.

Analysis Framework

The proposed increases to the affected bus fare payment categories are required to meet DTS' FY18 budget revenue projections, including the fare box recovery ratio of at least 27%. Due to the continued decline in ridership (unlinked passenger trips) and bus fare revenue, and steady increase in bus operating costs, DTS chose to increase bus fares instead of cutting bus service, since bus fares have not increased since 2010 and the public's strong opposition to the bus service cuts made in 2012.

Methodology:

In the absence of ridership data to determine minority, low income, and overall proportions of the affected fare payment types, Census block group data was used instead. A rider demographic survey is scheduled for FY19 and will include all fare media usage for future fare equity analyses.

Therefore, the following methodology was used to determine the minority, low income, and overall proportions for unlinked passenger trips of each fare type affected by the fare change to determine disparate impact and disproportionate burden. For consistent application of this methodology to all affected fare types, ridership data for adult single cash fare type was not used for this analysis.

1. Census block group demographic data from DTS' TVI Program (TVI) and system-wide bus stop unlinked passenger (on/off) data from OTS were used to determine the proportion of minority, low income, and overall ridership.

- Census block groups are identified as minority and low income in the TVI.
- Minority ridership: unlinked passenger on/off data from bus stops in minority Census block groups.
- Low income ridership: unlinked passenger on/off data from bus stops in low income Census block groups.
- Overall ridership: unlinked passenger on/off data from bus stops in non-minority and non-low income Census block groups.

Table 1: Percentage of system-wide bus stop unlinked passenger (on/off) data.

	Minority	Low Income	Overall
Minority		8%	
Low Income	8%		
Overall	19%	20%	53%
*Total	27%	28%	53%

*Total = 108% because 8% are from minority & low income Census block groups. (OTS March 2017 data)

2. Apply the minority, low income, and overall percentages from Table 1 uniformly to the total unlinked passenger trip data for the affected fare types. Unlinked passenger trip data is from OTS Bus Operations Passenger Composition and Revenue for the 12 months ending 6/30/17 (FY17). Table 2 shows the total unlinked passenger trips for the affected fare types and the fare type percentage of the total.

Table 2: FY 17 Total Unlinked Passenger Trips for Affected Fare Types

Fare Type	Unlinked Passenger Trips	% of Total
Adult Cash	7,588,346	11.8%
Adult 1-day Pass	4,665,357	7.2%
Adult Monthly Pass	24,027,392	37.2%
Youth Monthly Pass	3,801,020	5.9%
Senior/Disabled Monthly/Annual Pass	20,038,355	31.1%
Other	4,385,196	7%
Total	64,505,666	100%

Adult 1-day Pass used Transfer data.
Other includes fares not affected by proposed increase.

Table 3 shows across the board application of the minority, low-income, and overall percentages from Table 1 to determine unlinked passenger trips for each affected fare types.

Table 3: Unlinked Passenger Trips - Minority, Low Income, Overall

Fare Type	Minority (27%)	Low Income (28%)	Overall (53%)
Adult Cash	2,048,853	2,124,737	4,021,823
Adult 1-day Pass	1,259,646	1,306,300	2,472,639
Adult Monthly Pass	6,487,396	6,727,670	12,734,518
Youth Monthly Pass	1,026,275	1,064,286	2,014,541
Senior/Disabled Monthly/Annual Pass	5,410,356	5,610,739	10,620,328
Other	1,184,003	1,227,855	2,324,154
Total	17,416,530	18,061,586	34,188,003

Adult 1-day Pass used Transfer data.
Other includes fares not affected by proposed increase.
Total of all groups represents 108%-see Table 1.

The change between existing and proposed fares for the affected fare types are shown in Table 4 and includes the associated minority, low-income, and overall unlinked passenger trips from Table 3.

Table 4: Affected Fare Type Change Chart and Unlinked Passenger Trips by Group

Count	Cost		Change		Unlinked Passenger Trips by Group		
Fare Type	Existing	Proposed	Absolute	Percent	(28%) Minority	(27%) Low-Income	(53%) Overall
Adult Cash	$2.50	$2.75	$0.25	10.0%	2,048,853	2,124,737	4,021,823
Adult 1-Day Pass	$5.00	$5.50	$0.50	10.0%	1,259,646	1,306,300	2,472,639
Adult Monthly Pass	$60.00	$70.00	$10.00	16.7%	6,487,396	6,727,670	12,734,518
Youth Monthly Pass	$30.00	$35.00	$5.00	16.7%	1,026,275	1,064,286	2,014,541
Senior/Disable Monthly & Annual Pass	$5.00 $30.00	$6.00 $35.00	$1.00 $5.00	20.0% 16.7%	5,410,356	5,610,739	10,620,328
Total					16,232,527	16,833,732	31,863,849

Adult 1-day Pass used Transfer data.
Total of all groups represents 108%-see Table 1.

Assessing Impacts

Disparate Impact and Disproportionate Burden: Based on the methodology used to determine the 28% minority and 27% low income percentages of the total system-wide unlinked passenger trips that was applied uniformly to the affected fare types, adverse impacts of the proposed fare changes do not disproportionately affect the minority or the low income ridership (unlinked passenger trips) more than the non-minority or non-low income ridership.

Fare Equity Analysis: The proposed increases to the affected bus fare payment categories are required to meet DTS' FY18 budget revenue projections, including the fare box recovery ratio of at least 27%. Due to the continued decline in ridership (unlinked passenger trips) and bus fare revenue, and steady increase in bus operating costs, DTS in coordination with BFS chose to increase bus fares instead of cutting bus

service since bus fares have not increased since 2010 and the public's strong opposition to the bus service cuts made in 2012.

As shown in Tables 2 and 4, the 10% to 20% fare increases affect 93.2% of the total unlinked passenger trips and are distributed in the most practical manner through the following fare types.

- adult cash fare increases by 10% affecting 11.8% of total unlinked passenger trips.
- adult 1-day pass increases by 10% affecting 7.2% of total unlinked passenger trips.
- adult monthly pass increases by 16.7% affecting 37.2% of total unlinked passenger trips.
- youth monthly increases by 16.7% affecting 5.9% of total unlinked passenger trips.
- senior/disable monthly pass increases by 20% and the annual pass increases by 16.7% affecting 31.1% of total unlinked passenger trips.

During the public engagement process, there was very little public comment/opposition to the bus fare increases. It appears that the 2012 service cuts are still fresh in the minds of the ridership, who at the time, preferred a fare increase over service cuts.

Department of Transportation Services (DTS)
Public Transit Division Title VI Program
Service Equity Analysis Report
Peak Express Routes: 85 Windward Express – Kaneohe
87 Windward Express – Kailua
PH4 Kaneohe – Kahaluu – Pearl Harbor Express
PH5 Windward (Kailua) – Pearl Harbor 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.

The City and County of Honolulu (City) comprises the entire island of Oahu and includes the Honolulu urbanized area (UZA), 200K to 1M in population, and the Kailua-Kaneohe UZA, 50K to 199.9K in population. UZA Kailua-Kaneohe is located in the City's Windward region, northeast of Urban Honolulu and separated by the Koolau mountain range.

A future rail line is under construction to connect Leeward Oahu with Urban Honolulu and DTS is currently in the initial bus-rail integration planning phase for communities located along or adjacent to the rail line. Since the rail line will not directly benefit Windward Oahu communities; prior to the full commitment of time and resources to bus-rail integration planning, it was important for DTS to evaluate Windward bus service to address current ridership trends and provide connectivity to the future rail line.

In 2017, while conducting route analyses and public outreach for peak express Routes 85/87*, PH4, and PH5, the 2018 Windward TheBus Routes Redesign Project (WBRR) was initiated to evaluate and propose modifications to peak express and local routes that serve the Windward communities of Waimanalo, Kailua, Kaneohe, and Kahaluu. Although planning had already begun for Routes 85/87, PH4, and PH5 in 2017, these routes were also included in the WBRR. (*Two route variations using Pali and Likelike Highways comprised the original Route 85 - the variation that operated on Pali was renumbered to Route 87 in August 2017, while the Likelike segment retained the Route 85 designation.)

This report is the service equity analysis of the changes to the Windward segments of Peak Express Routes 85, 87, PH4, and PH5 that are scheduled for implementation in March 2019. With the exception of Route PH4, there are no changes to the Urban Honolulu route segments for these routes. Should the modifications for the other Windward routes proceed, service equity analyses will be conducted 6 months prior to scheduled implementation.

The results of this service equity analysis will also be included in the 2019 TVI Program.

Background

Windward bus service was established incrementally over the last 40 years and there has been relatively little change to current bus routing in the Windward region while the Kailua-Kaneohe communities have experienced major growth and development during this time, as evidenced by their UZA status.

The construction of the Pali, Likelike, and H-3 Interstate Highways and Tunnels is the contributing factor to the development of the Kailua-Kaneohe communities. Pali Highway directly connects Kailua to Urban Honolulu's Central Business District (CBD), Likelike Highway connects Kaneohe to Urban Honolulu's Kalihi District, and the H-3 Highway connects Joint Base Pearl Harbor-Hickam (JBPHH) located on the western fringe of Urban Honolulu in the Aiea District with Marine Corps Base Hawaii located in the Aikahi community, the boundary between Kailua and Kaneohe.

Pali Highway was the first highway that was constructed, which allowed the development of Kailua well before Kaneohe. As a result, Windward bus service began operating along Pali Highway and with the exception of a few peak period express routes, most Windward bus service currently operate on Pali Highway to connect to Urban Honolulu. As Kaneohe grew, these Kailua-centric routes were extended to include Kaneohe with different route variations for cost containment and to address new development.

The main goals of restructuring Windward bus service in the WBRR are:

- Evaluate current service and address service demand/productivity to maximize service delivery/quality based on the priority of need, operating efficiency, and resource allocation.
- Connect Windward communities more effectively and provide more connections to Windward Community College.
- Connect Windward districts with Honolulu, Kalihi Transit Center, and the future rail system.

Rider surveys/outreach for Routes PH4/PH5 and 85/87 were conducted as separate initiatives in 2017 and incorporated into the WBRR. Public outreach for the WBRR Phase 1 was conducted in early 2018 and is scheduled to begin in late 2018 for WBRR Phase 2.

Peak Express Route 85: Windward Express Kaneohe
Peak Express Route 87: Windward Express Kailua

Routes 85 and 87 provide service from their respective Windward districts, Kaneohe and Kailua, to Downtown Honolulu and University of Hawaii Manoa. Both routes are being restructured in the Windward service area to provide dedicated service for Kaneohe or Kailua by eliminating the route's cross over segment. Aikahi Shopping Center borders Kaneohe and Kailua and will be the starting/end points for both routes.

The current Route 85 is the Kaneohe peak express service operating on Likelike Highway; it starts its AM trips and ends its PM trips in Kailua. The current Route 87 is the Kailua peak express service operating on Pali Highway and ends its PM trips in Kaneohe. Ride checks were conducted and confirmed data that showed very low ridership on the Kailua and Kaneohe segments for Routes 85 and 87, respectively.

Peak Express Route PH4: Kaneohe/Kahaluu/Pearl Harbor Express
Peak Express Route PH5: Windward Kailua/Pearl Harbor Express
Joint Base Pearl Harbor Hickam (JBPHH) is one of the largest employers in the City, therefore, specialized peak express service was established specifically for JBPPH employees who reside in the various districts of Oahu. Currently there are 7 Pearl Harbor (PH) Routes providing peak express service between JBPHH and the Waianae Coast (PH1), Mililani (PH2), Wahiawa (PH3), Kaneohe/Kahaluu (PH4), Kailua (PH5), Hawaii Kai (PH6), and Ewa (PH7). The 2017 review of the ridership on PH routes found that PH4 and PH5 each carried less than half a seated load while the other PH routes carried more than half to full seated loads.

To address low ridership and preserve PH service to the maximum extent feasible, Routes PH4 and PH5 are being merged into one route (new PH4) since they serve the neighboring districts of Kaneohe and Kailua; and Route PH5 passes through Kaneohe on its way to JBPHH via the H-3 Interstate Highway. While the existing PH4 route operates on Likelike Highway, the new PH4 route will operate on the H-3 Highway.

Proposed Changes:
Attachment 1 contains the existing and proposed route maps for Routes 85, 87, PH4, and PH5. Route redesign will generally use the existing bus network to provide restructured service. With the exception of Route PH4, the proposed changes affect only the Windward route segments and are summarized and detailed below.

AM/PM Peak Express Routes		
Route #	**Existing Routing**	**Proposed Routing**
85 (AM) **(PM)**	Kailua, Aikahi, Kaneohe, CBD, UHM UHM, CBD, Kaneohe, Aikahi, Kailua	Aikahi, Kaneohe, CBD, UHM UHM, CBD, Kaneohe, Aikahi
87 (AM) **(PM)**	Kailua, CBD, UHM UHM, CBD, Kailua, Aikahi, Kaneohe	Aikahi, Kailua, CBD, UHM UHM, CBD, Kailua, Aikahi
PH4 (AM) **(PM)** **PH5 (AM)** **(PM)**	Kaneohe–Heeia Coast-Kahaluu-JBPPH JBPHH-Kaneohe-Heeia Coast-Kahaluu Kailua - JBPHH JBPHH - Kailua	Kailua–Kaneohe–Kahaluu-JBPHH JBPHH–Kailua-Kaneohe-Kahaluu

UHM: University of Hawaii at Manoa
CBD: Central Business District (Downtown Honolulu)
JBPPH: Joint Base Pearl Harbor-Hickam

AM/PM Peak Express Route Changes		
Existing Route #	**Proposed Route #**	**Proposed Changes**
85	**85**	1) Transfers Kailua segments to Rte 87; 2) Extends routing to provide service to Mokulele/Namoku/Aumoku Sts. &

		discontinues service on Kaneohe Bay Dr. between Mokulele Dr./Aumoku St.
87	**87**	1) Extends AM routing to Aikahi to replace Rte 85 & discontinues a section of the Kailua Rd. segment; 2) PM routing to Kaneohe transfers to Rte 85; 3) Route extension to provide service to Hele/Kupau Sts.
PH5 **PH4**	**PH4**	1) Merges Rte PH5 into Rte PH4; 2) Discontinues a section of the Kamehameha Hwy (Heeia Coast) segment; 3) Uses H-3 instead of Likelike Hwy. & discontinues service at the Likelike Hwy./School St. bus stop.

UHM: University of Hawaii at Manoa
CBD: Central Business District (Downtown Honolulu)

Route 85

1) AM trips will not serve the Kailua via Kuulei Road and North Kalaheo Avenue segment and PM trips will not serve the Kailua via North Kalaheo Avenue, Kuulei Road, Kailua Road, Wanaao Road, Keolu Drive, and Kalanianaole Highway segment. Route 87 will serve these segments.
2) Route is extended to serve the Kaneohe community accessed by Mokulele, Namoku, and Aumoku Streets; this extension causes discontinuation of service on the Kaneohe Bay Drive segment between Mokulele Drive and Aumoku Streets.
3) No change to the amount of trips and headways.
4) Schedule revisions to account for new service areas.

Route 87

1) AM routing will be extended to new starting point at Aikahi to replace discontinued Route 85 service, this extension causes discontinuation of Route 87 on the Kailua Road segment between Kalanianaole Highway and Oneawa Street.
2) PM trips will end at Aikahi and not serve Kaneohe via Mokapu Boulevard and Kaneohe Bay Drive. Route 85 will serve this segment.
3) Route is extended to serve the Kailua community accessed by Hele and Kupau Streets.
4) No change to the amount of trips and headways.
5) Schedule revisions to account for new service areas.

Routes PH4 and PH5

1) PH4 and PH5 are being merged into one new Route PH4.
2) Existing PH4 segments on Kamehameha Highway (Heeia Coast) between Kahekili Highway/Haiku Road and on Kahekili Highway between Kamehameha Highway/Ahuimanu Road will be discontinued.
3) New Route PH4 will use the H-3 Highway instead of Likelike Highway, therefore, the bus stops on Likelike Highway at School Street will not be served.
4) The Kailua segment will be served first on the one AM and one PM trips. Kailua riders will have an earlier and longer ride in the AM, and a shorter ride in the PM (vice versa for Kaneohe riders). In the AM, trip duration for Route PH5 increases

by approximately 30 minutes and decreases by about 10 minutes for Route PH4. In the PM, trip duration for Route PH4 increases by approximately 15 minutes and decreases by about 5 minutes for Route PH5.

5) The existing arrival times at JBPHH will stay the same.

Public Engagement Process

DTS conducted public outreach in 2017 for Routes 85/87 and PH4/PH5, and again in early 2018 during Phase 1 of the WBRR, in accordance with DTS' Public Participation Standard Operating Procedures.

Riders of the affected routes, as well as the public were encouraged to provide comments and suggestions via email, phone call, voicemail, or online survey. Public outreach includes notifying affected Councilmember/Neighborhood Boards, distributing informational material, posting notices on the OTS TheBus website/on-board buses/at selected bus stops, conducting surveys, and on-board rider checks.

DTS' efforts to engage minority, low income, and Limited English Proficient (LEP) riders were facilitated by the commuter characteristics of these peak express routes that provide dedicated weekday service between suburban communities and central urban districts in the AM and PM peak periods and generally have regular riders. Due to the limited number of trips and service area coverage in Urban Honolulu, on-board distribution of notices, brochures, and surveys were made to the majority of riders. For Routes 85 and 87, distribution for AM trips were made at either the last Windward bus stop or the first Urban Honolulu bus stop. For the PM trips, distribution was made while riding the Urban Honolulu segment until the last bus stop. Since Routes PH4 and PH5 each have only 1 AM and 1 PM trip with regular riders, distribution was made on-board while conducting ride checks, at the last Windward bus stop in the AM, and at the first Windward bus stop in the PM.

To engage Limited English Proficient (LEP) persons, the informational brochures were translated into the languages identified in DTS' 2016 Public Transit Title VI program for printing, upon request. Informational material on the website was available in a format to use the translation feature.

The timeline below outlines DTS and OTS public engagement activities for Routes 85, 87, PH4, and PH5.

February to October 2017:	Conducted public outreach/surveys and ride checks for Routes 85/87, PH4, and PH5. In February, notices informing the riders of the upcoming survey regarding proposed changes were distributed to Windward area City Council Member (CM) and Neighborhood Boards (NB), on-board buses, signs at selected bus stops, and DTS/OTS websites.

In mid-April to early May, survey and ride checks were conducted and included onboard distribution of surveys and initiation of an online survey form. Ride checks were conducted to validate ridership data.

In June, survey results for Route 85 were distributed to CM and NBs and posted online, and between August and mid-September were distributed onboard to riders.

In August, implemented renumbering of the Route 85 trips that operated on Pali Highway to Route 87 and retained Route 85 numbering for the trips that operated on Likelike Highway. No changes were made to the routing.

During August to September, ride checks were conducted on Routes 85 and 87.

In October, distributed Routes PH4 and PH5 survey results to onboard to riders while conducting additional ride checks.

November 2017 to May 2018:

Conducted WBRR-Phase 1 public outreach/surveys and ride checks that included Routes 85, 87, PH4, and PH5.

In November 2017, notified and discussed the WBRR-Phase 1 with CM and City Council Transportation Committee (CTC). Phase 1 also included Routes 85, 87, PH4, and PH5.

In December 2017, notified affected NBs of the proposed redesign plans to Phase 1. Presentations to be made upon request by the NB. Brochures and notices were provided to affected NBs for distribution.

During January-April 2018, Phase 1 public outreach and comment period commenced. Detailed proposal information including route detail and maps were made available for public review and comment via online SurveyMonkey. Brochures and/or notices are distributed to riders on-board affected routes, at selected bus stops, on placards posted onboard all buses, and at public libraries, Satellite City Halls, and selected businesses and schools in affected districts. Affected riders and the public were encouraged to attend NB meetings, obtain information/provide feedback online at DTS and TheBus websites or through phone calls, emails, or in-person. Presentations made at the CTC meeting, and the

	Koolauloa, Kahaluu, Kaneohe, Kailua, and Waimanalo NB meetings. In January 2018, distributed WBRR-Phase 1 brochure and notice onboard Routes PH4 and PH5 to riders while conducting ride checks.
June to August 2018:	Based on public input and current data, revised and finalized WBRR which included Routes 85, 87, PH4, and PH5. Public outreach and comment period for WBRR-Phase 2 is scheduled to begin in November 2018. Implementation is scheduled for March 2019 for the service changes to Routes 85, 87, PH4, and PH5 with public/rider notification in January-February 2019.
January to February 2019:	Inform Routes 85, 87, PH4, and PH5 ridership of March implementation for route service changes. Distribute notices onboard to riders and conduct ride checks for Routes PH4/PH5, distribute notices onboard to riders for Routes 85 and 87, and post notices at selected bus stops and on DTS/OTS website. Distributed notices to CM, CTC, and NBs. Presentations to be conducted upon request by NBs.
March 2019:	Scheduled implementation for Peak Express Routes 85, 87, and new PH4.

Survey and Ride Check Results

Routes 85 and 87: Results of the April 2017 survey for Route 85 were split; half of the riders favored the proposed route changes, while the other half opposed it. With no clear majority, no routing changes were made; instead, the Route 85 segment that operated on Pali Highway was renumbered to Route 87, while the Likelike Highway segment retained the Route 85 designation. The renumbering was implemented in August 2017.

The WBRR-Phase 1 consisted of dedicated Kaneohe service for Route 85 and dedicated Kailua service for Route 87 between Aikahi and Urban Honolulu. Results of the WBRR-Phase 1 survey: Route 85 (0 favored/5 opposed/7 comments), Route 87 (2 favored/2 opposed/2 comments).

Based on WBRR-Phase 1 public feedback, the redesign for Routes 85 and 87 were modified to include route extensions to other service areas.
Results of follow-up survey: Route 85 (29 favored/8 opposed/16 comments), Route 87 (30 favored/4 opposed/6 comments).

Ride checks conducted for the discontinued segments of Routes 85 and 87 provided the following information.
Route 85: AM trips averaged 3 daily boardings and no alightings - PM trips averaged 5 alightings and 1 boarding.
Route 87: AM trips averaged 6 daily boardings and no alightings

Routes PH4 and PH5: Results of the April 2017 survey found that most riders on both routes would continue to ride the merged route even though a significant number of riders opposed the merger. On the days that DTS or OTS staff conducted ride checks while distributing surveys or survey results, there were 0 to 5 riders that boarded in the PH4 segment DTS plans to discontinue.

The WBRR-Phase 1 included the consolidation of PH4 and PH5 into one route and the discontinuation of the PH4 route segment in the Heeia Coast area.
Results of the WBRR-Phase 1 survey: 0 favored/7 opposed.

Although WBRR-Phase 1 public feedback objected to the PH4/PH5 merger, the proposed changes remained the same.
Results of follow-up survey: PH4/PH5 (21 favored/15 opposed/15 comments).

Results of PH4 ride checks conducted along the discontinued Windward segment: 3 daily average boardings, no alightings, and of the 3 boardings, 1 went to JBPHH & 2 alighted in Kalihi at the bus stop on Likelike Highway at School Street.
Results of PH4 ride checks at the bus stop on Likelike Highway at School Street: 2 daily average alightings and 2 daily average boardings.

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 route segments or modifying span of service by more than 10% for a route is defined as major service change that requires DTS to perform a service equity analysis during the planning phase prior to implementation. Route segments are being eliminated from Routes 85, 87, and PH4; and trip duration for Routes PH4 and PH5 increases by more than 10%.

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 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 the existing Route 85, 87, PH4, or PH5.
- Minority and low income proportion of the affected service area population located within a ½ mile radius of the proposed Route 85, 87, or PH4.

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	Disparate Impact >10%
	Total Population	Minority Population	% Minority	Affected Population	Minority Population	% Minority		
85	244,978	41,636	17%	146,626	28,437	19%	+2%	No
87	200,179	38,305	19%	136,279	30,419	22%	+3%	No
PH4	95,922	11,460	12%	65,157	1,665	3%	-9%	No
PH5	74,216	1,801	2%	65,157	1,665	3%	+1%	No

Table 2: Census Block Group Low Income Populations

Route	Total Service Area			Affected Service Area			% Difference Total-Affected Service Areas	Dispropor-tionate Burden >10%
	Total Population	Low Income Population	% Low Income	Affected Population	Low Income Population	% Low Income		
85	244,978	53,311	22%	146,626	38,796	27%	+5%	No
87	200,179	18,644	9 %	136,279	16,193	12%	+4%	No
PH4	95,922	45,161	47%	65,157	18,889	29%	-18%	No
PH5	74,216	17,420	24%	65,157	18,889	29%	+5%	No

Required Maps: (see Attachment 1)
Affected census block groups with minority and low income area block groups.

Assessing Impacts

Disparate Impact: The minority Census block group populations for the Routes' total service and affected service areas are shown in Table 1 above.

The effects of the service changes to Routes 85, 87, PH4, and PH5 do not exceed the disparate impact policy threshold of 10%.

- The minority population for Route 85 in the affected service area is 2% more than the minority population in the total service area.
- The minority population for Route 87 in the affected service area is 3% more than the minority population in the total service area.
- The minority population for Route PH4 in the affected service area is 9% less than the minority population in the total service area.
- The minority population for Route PH5 in the affected service area is 1% more than the minority population in the total service area.

Disproportionate Burden: The low income Census block group populations for the Routes' total service and affected service areas are shown in Table 2 above.

The effects of the service changes to Routes 85, 87, PH4, and PH5 do not exceed the disproportionate burden policy threshold of 10%.

- The low income population for Route 85 in the affected service area is 5% more than the low income population in the total service area.
- The low income population for Route 87 in the affected service area is 4% more than the low income population in the total service area.
- The low income population for Route PH4 in the affected service area is 18% less than the low income population in the total service area. The 18% applies to the affected non-low income population, who is impacted more by the proposed changes than the affected low income population.
- The low income population for Route PH5 in the affected service area is 5% more than the low income population in the total service area.

Service Equity Analysis

Based on the thresholds established in the DTS Major Service & Fare Change Policy and Disparate Impact & Disproportionate Burden Policies, the proposed service changes to Routes 85, 87, PH4, and PH5 do not have a disparate impact on minority populations, do not place a disproportionate burden on low income populations, and can be implemented as planned.

Route 85: Loss of service affects the segment located on Kaneohe Bay Drive between Mokulele Drive and Aumoku Street, however, ridership data validated with ride checks, indicated that daily ridership in this segment averages 3 boarding riders in the AM and 5 alighting riders in the PM. There is no loss of service for the other discontinued segment since it will be served by Route 87. In addition, the discontinued segments are located in Census block groups identified as predominantly non-minority and non-low income. In response to public feedback, the route has been extended to serve a residential community with local service but no peak period express service.

Route 87: Loss of service affects a short AM only segment located on Kailua Road between Kalanianaole Highway and Oneawa Street, however, ridership data validated with ride checks, indicated that daily ridership in this segment averages 4 boarding riders, and of the 5 affected bus stops, only the 2 end stops at Kalanianaole Highway and Oneawa Street are used. Adjacent bus stops will allow riders who currently board

in the discontinued segment to continue to use this route. The other discontinued segments will be served by Route 85 and most discontinued segments are located in Census block groups identified as predominantly non-minority and non-low income. In response to public feedback, the route has been extended to serve a residential community with local service but no peak period express service.

Route PH4: Due to time, distance, and very low ridership, the segments located on Kamehameha Highway between Haiku Road and Kahekili Highway (Heeia Coast) and on Kahekili Highway between Kamehameha Highway and Ahuimanu Road are being discontinued. According to ridership data and confirmed by ride checks:

1) Total route ridership along this segment averages 2-5 riders per day. On some of the ride check days, there were no boardings or alightings in this segment.
2) On the days with 5 riders, 2 riders go the JBPHH (1 regularly, the other occasionally). The regular rider boards at the first bus stop in the discontinued segment and is able to use Route 55 to transfer to PH4 at the nearest bus stop approximately a half mile away from the discontinued bus stop.
3) On the days with 5 riders, 3 riders alight prior to JBPHH, 1 in Kahaluu and 2 in Kalihi.

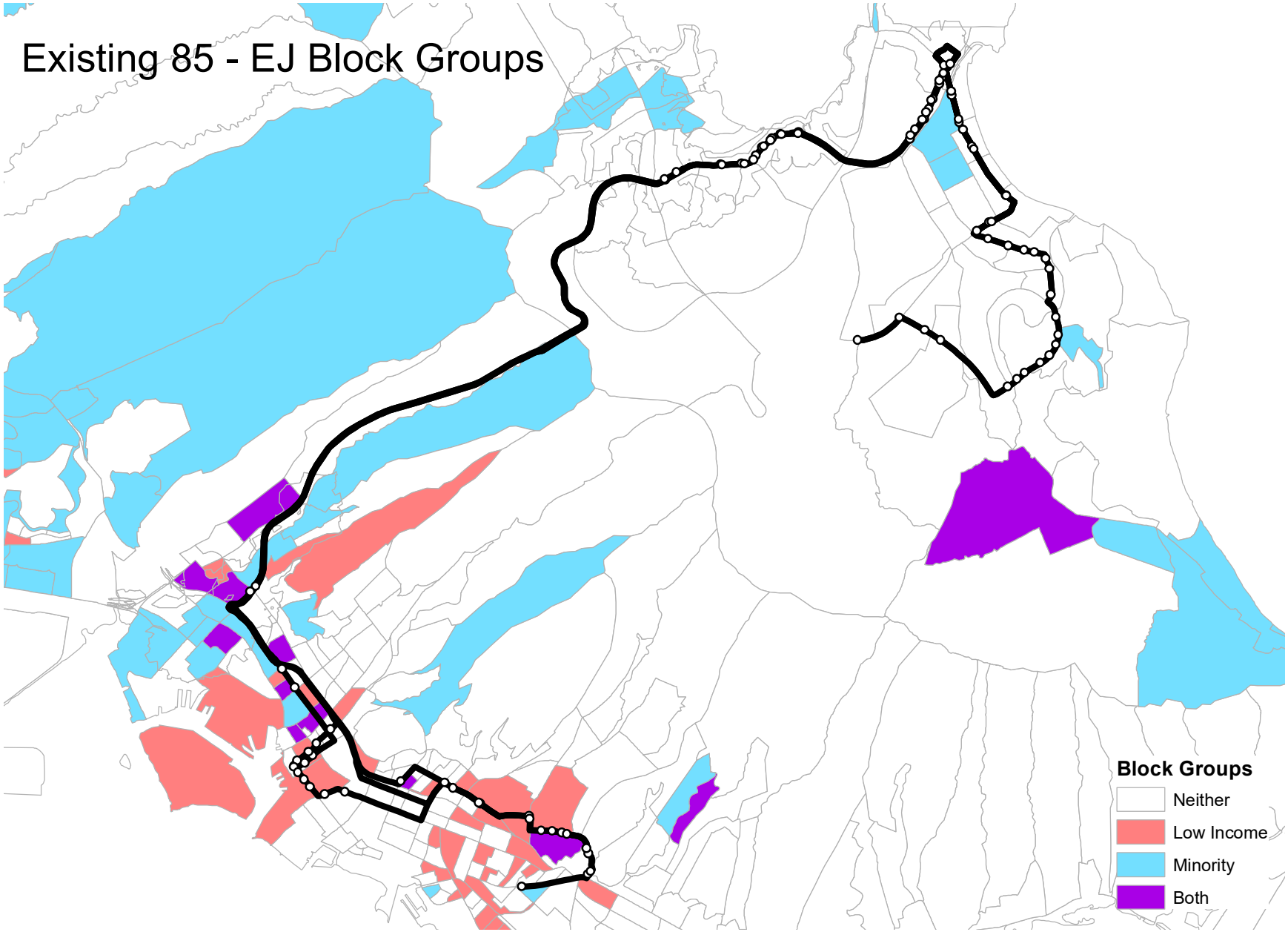
The new Route PH4 will travel from the Windward district to JBPHH along the H-3 interstate instead of the Likelike Highway; while this routing change provides faster service to JBPHH, it eliminates AM and PM service to the bus stops on Likelike Highway at School Street. Riders boarding at this bus stop can access JBPHH by transferring from a local route, and Windward riders can use Routes 85, 85A, or 88 to reach this bus stop. The discontinued segment in the Windward service area is located in Census block groups identified as predominantly non-minority and non-low income. The Likelike Highway/School Street bus stop is located in Census block groups identified as predominantly minority and low income, however, the main purpose of PH4 is to provide service for JBPHH employees who reside in Kaneohe. The new merged route has minimal impact to the travel time for Route PH4 riders, the AM trip decreases by approximately 10 minutes, and the PM trip increases by about 15 minutes.

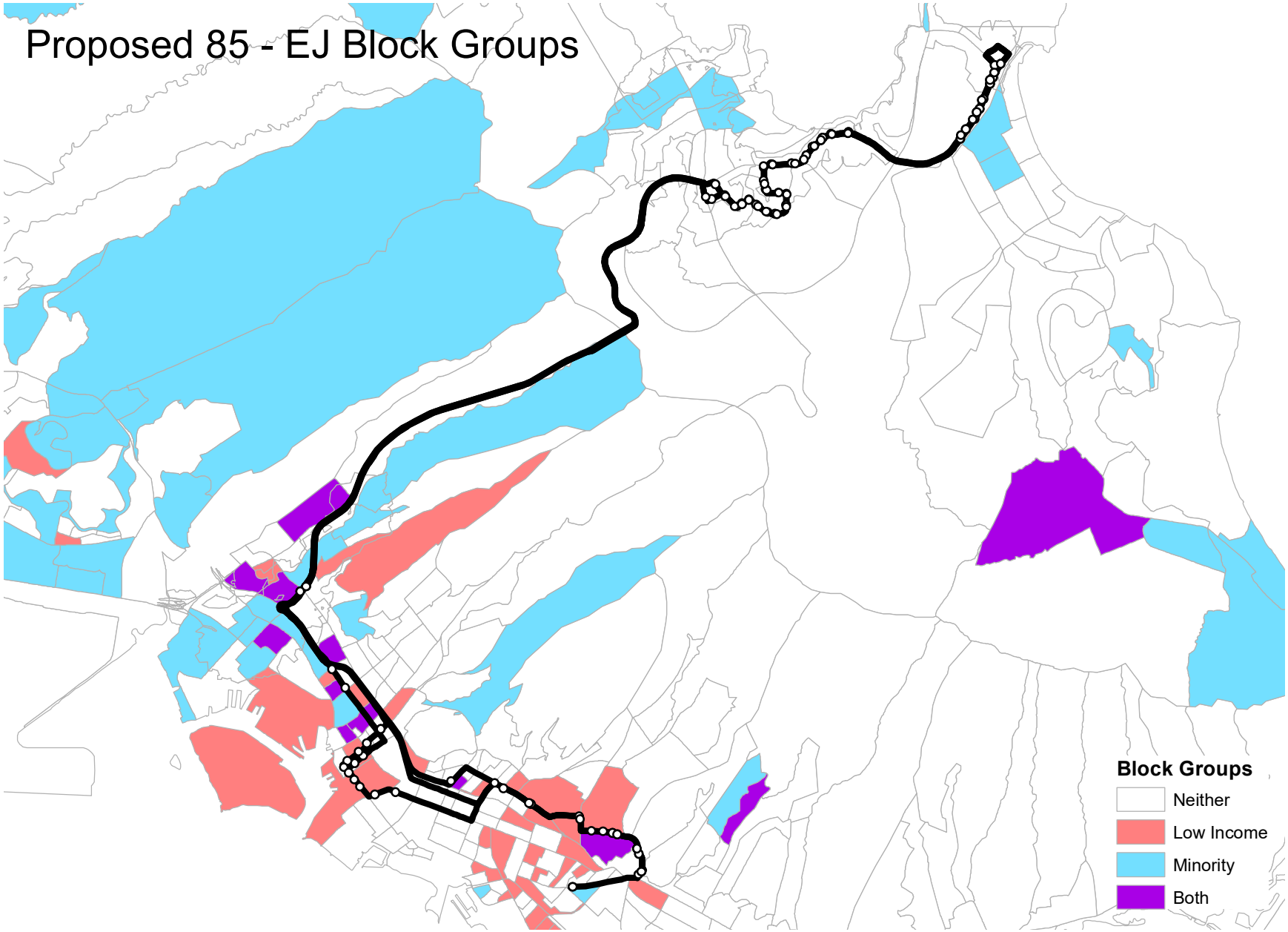
Route PH5: Riders will have an earlier and longer ride in the AM, and will have to alight on the other side of the street in the PM. The AM travel time of the new consolidated route has the most impact to Route PH5 riders as it increases by approximately 30 minutes, while the PM travel time decreases by about 5 minutes. While 30 minutes is a significant increase in travel time, the route consolidation was necessary to preserve the specialized peak express service for JBPHH employees who reside in the Windward communities of Kailua and Kaneohe. Most of the Kailua areas served by this route are located in Census block groups identified as predominantly non-minority and non-low income.

ATTACHMENT 1

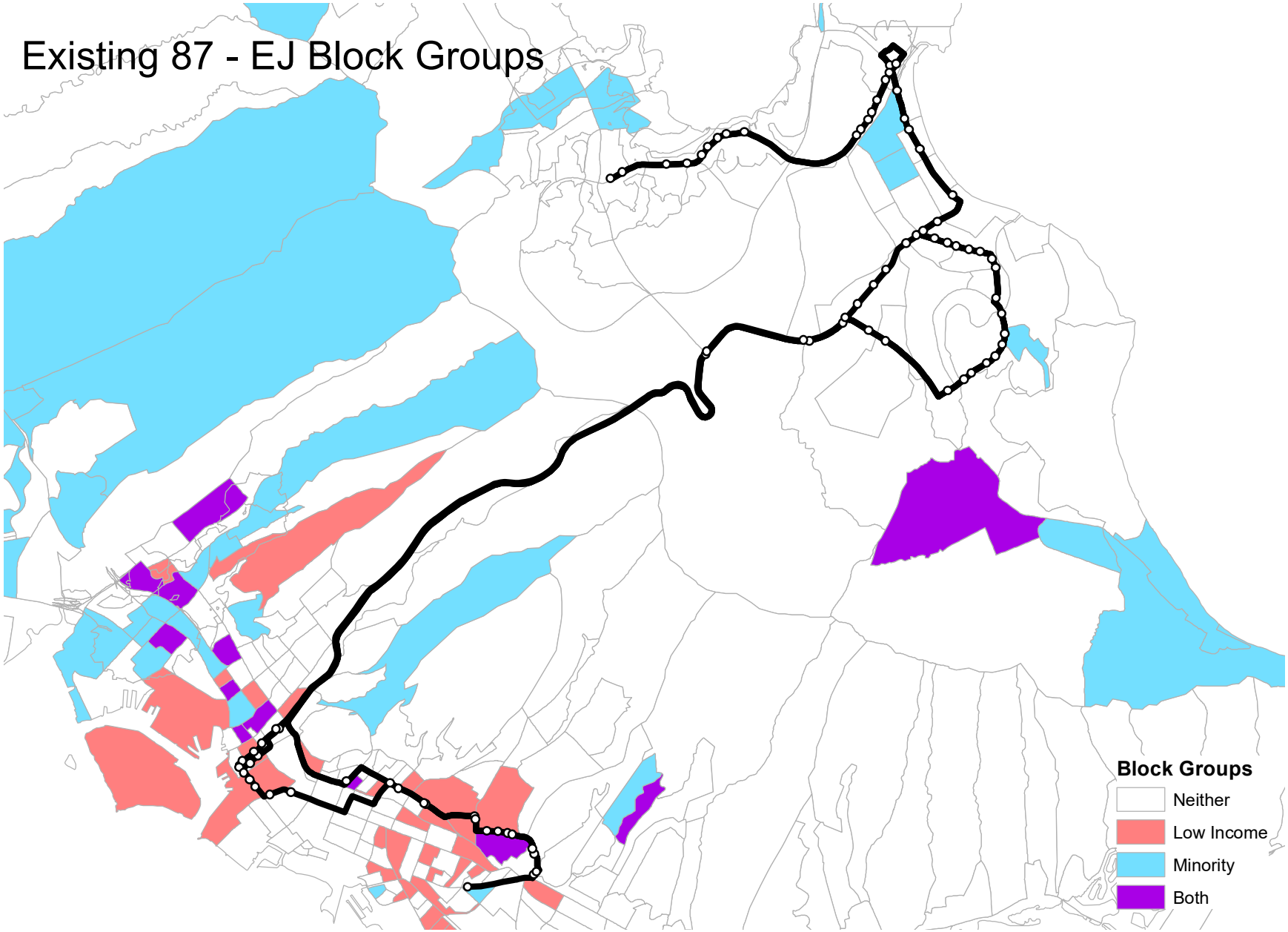
Individual Route Maps

85, 87, PH4, PH5

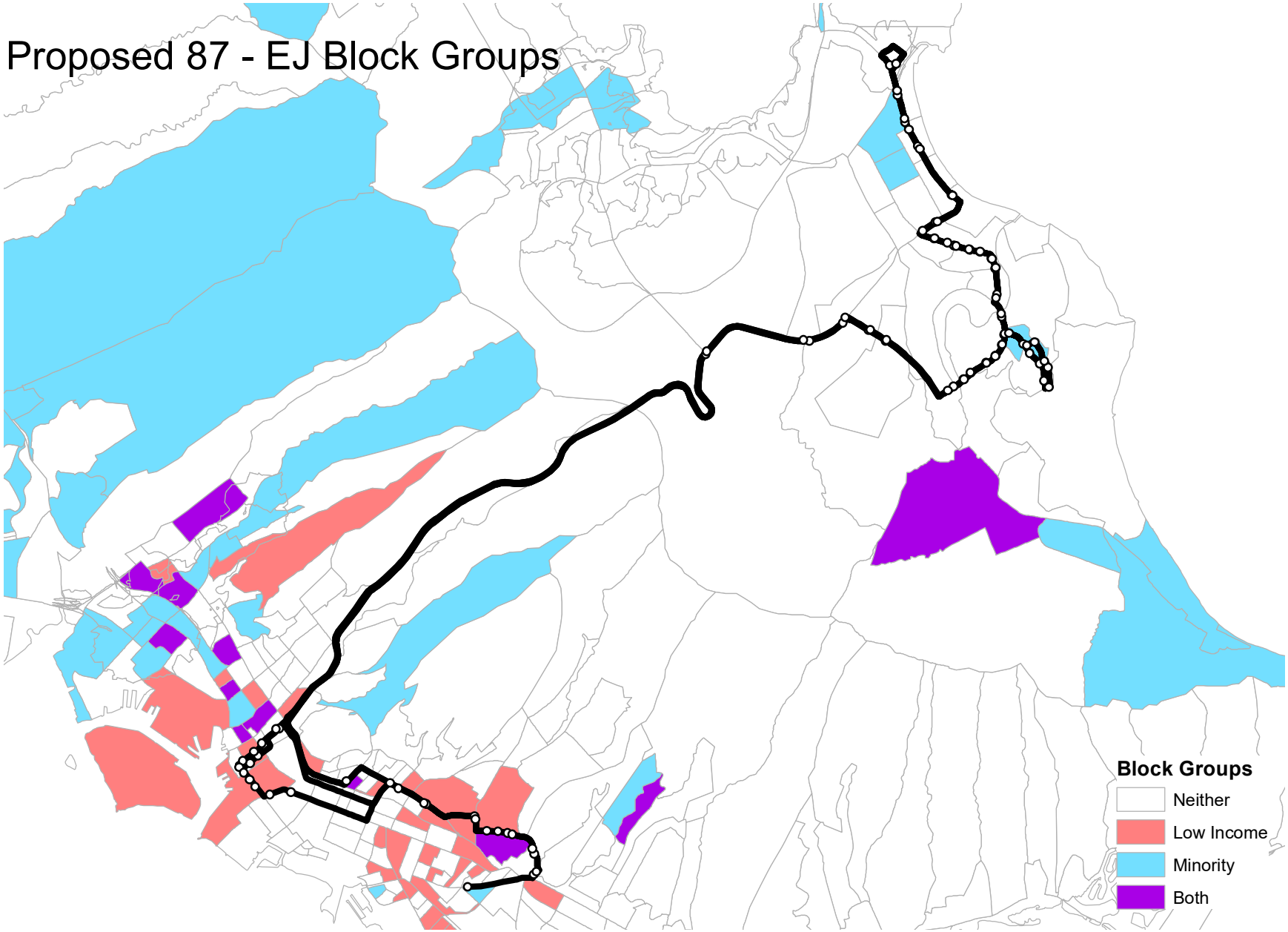

Existing 85 - EJ Block Groups
Block Groups
Neither
Low Income
Minority
Both

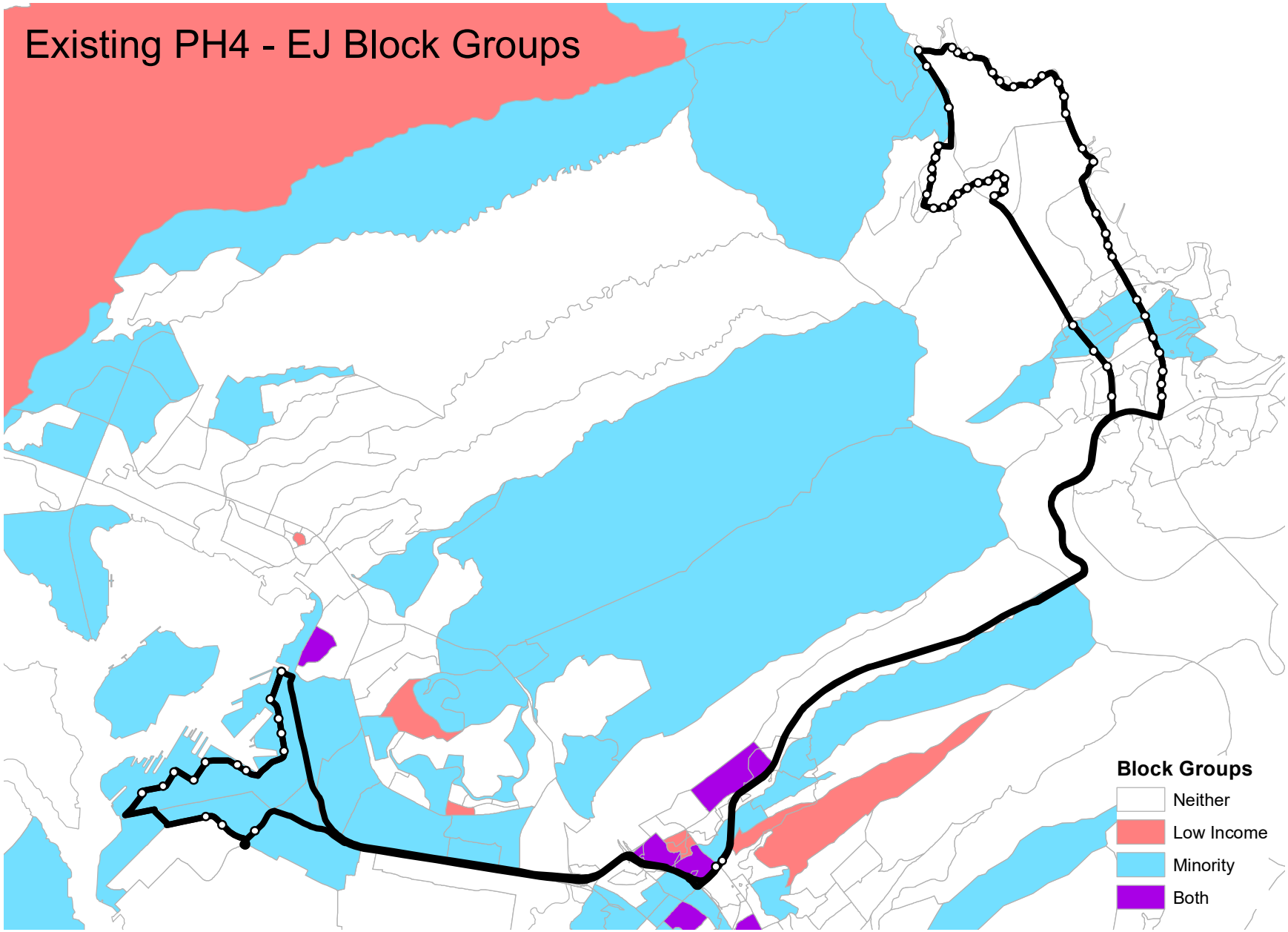

Proposed 85 - EJ Block Groups
Block Groups
Neither
Low Income
Minority
Both

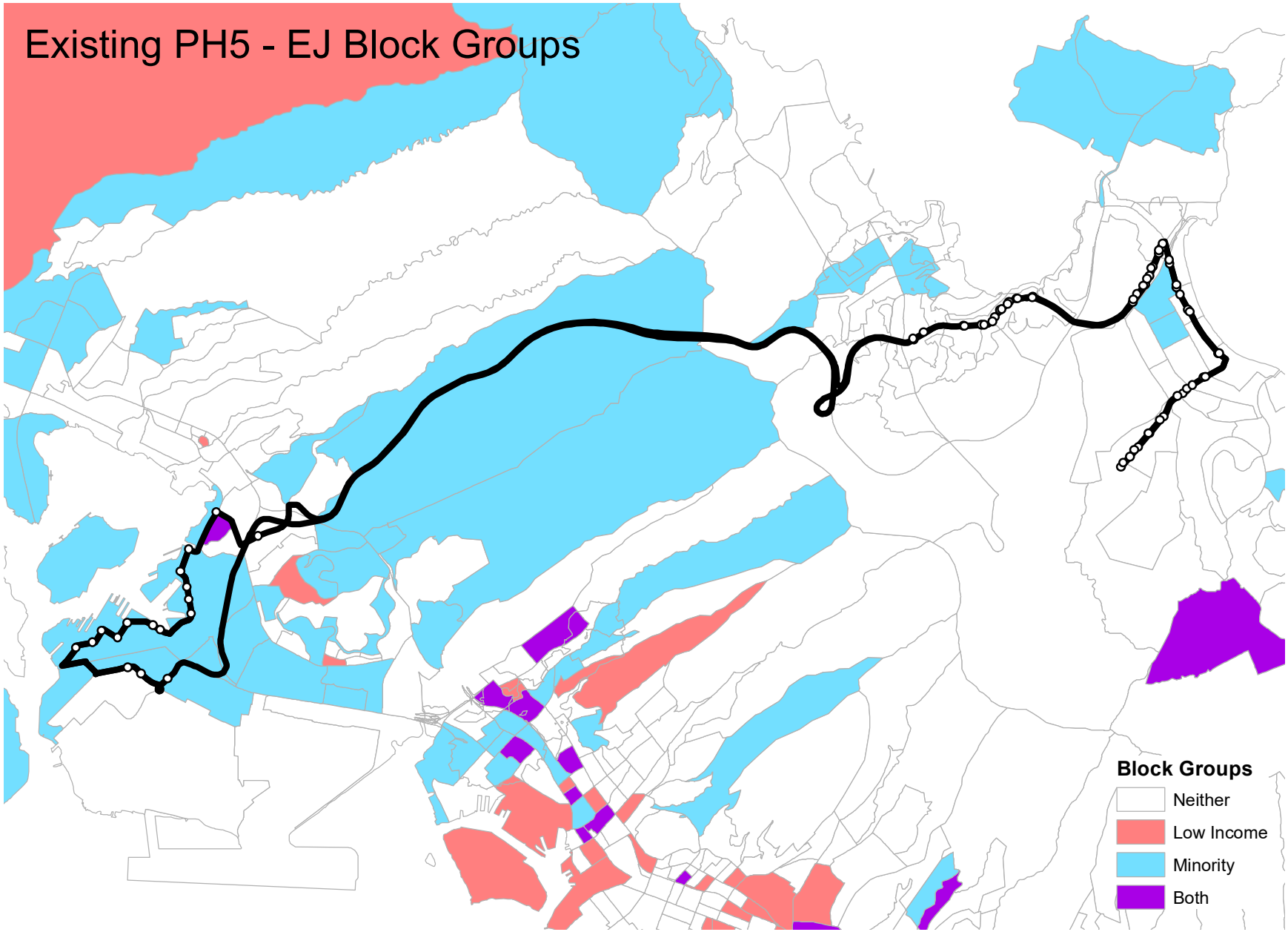
Existing 87 - EJ Block Groups



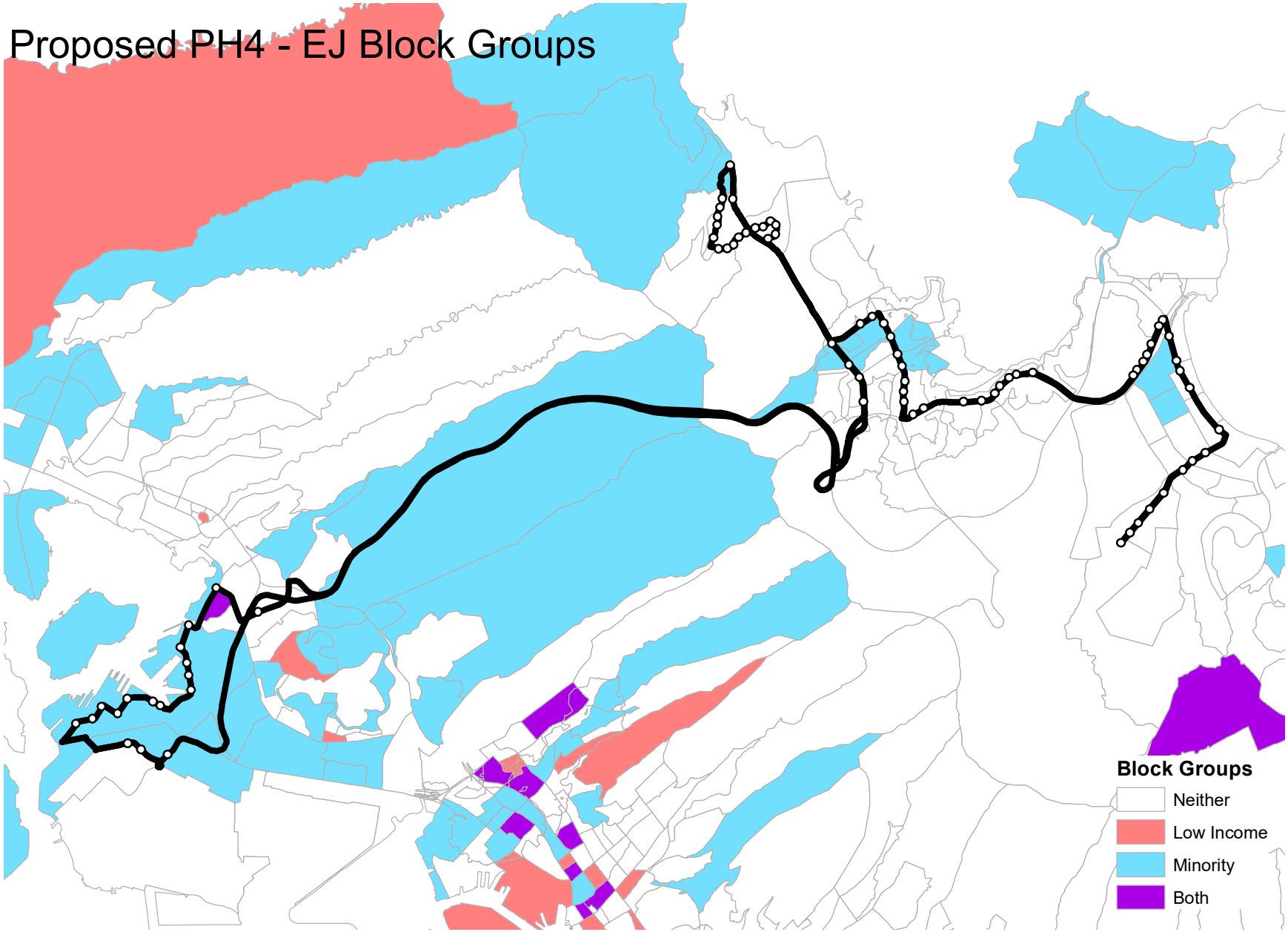
Proposed 87 - EJ Block Groups




Existing PH4 - EJ Block Groups
Block Groups
Neither
Low Income
Minority
Both


Existing PH5 - EJ Block Groups
Block Groups
Neither
Low Income
Minority
Both

Proposed PH4 - EJ Block Groups



Department of Transportation Services (DTS)
Public Transit Division Title VI Program
Fare Change Equity Analysis
HOLO Card Migration

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 (Circular), 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 fare changes at the planning and programming stages to determine whether those changes have a disparate impact on minority populations and disproportionate burden on low income populations.

This report is the fare equity analysis of the proposed migration from "paper" bus passes to an electronic account-based, fare payment system branded the HOLO card (HOLO). Although there will be no fare increases with the implementation of HOLO, in accordance with the Circular, a fare equity analysis shall be conducted for changes in fare media or medium to assess the impacts of the proposed change on minority and low income riders. Full public implementation is scheduled for July 1, 2019.

HOLO will allow riders to pay for transit services with a contactless, reusable, reloadable electronic fare card ("smart" card) that is linked to a fare account containing stored value. Riders will simply tap HOLO to quickly board a bus, or in the future, upon entry into a rail station. The current fare structure, as defined in Section 13-2.1 of the Revised Ordinances of Honolulu, determines the type of HOLO issued and the associated fare amount to deposit/load into the account. On-board cash payment will still be accepted for single one-way fares.

Background

The current bus fare system consists of paying cash on-board for a single one-way fare or for a one-day "paper" pass for unlimited rides, and purchasing "paper" passes or identification cards (ID) for Monthly or Annual Passes for Adult, Youth, Senior Citizen, and Persons with Disabilities at designated network locations. Transfers are not an option for the single one-way cash fare and were replaced by the one-day pass. Also available are Bus Pass programs for University/College students/personnel and major employers or organizations.

Monthly bus passes (Adult, Youth) for the general public can be purchased at TheBus Pass Office located at the Kalihi Transit Center, approximately 90 retail vendors located island-wide, and the nine Satellite City Halls. Pictures are included on the Annual bus pass and ID for Senior Citizens and Persons with Disabilities, as well as the Annual Adult and Youth bus pass, therefore, these passes and the initial ID can only be purchased at TheBus Pass Office where the photo is taken and imbedded onto the pass/ID. The ID can be used for the on-board payment of a discounted single one-way

cash fare or a discounted one-day pass, or it can be used as a monthly pass by purchasing discounted monthly stickers at TheBus Pass Office or Satellite City Halls.

Since 2014, the City and County of Honolulu (C&C) Department of Transportation Services (DTS), Oahu Transit Services, Inc. (OTS), and the Honolulu Authority for Rapid Transit (HART) have been planning and developing a "smart" card account-based fare system that can be used across all modes of transit.

Goals for migrating to HOLO include:

- Integrated mass transit fare system: Seamless transfer through the system and across different transit modes increases transit use and rider accessibility.
- Increased rider convenience: Fares can be purchased and loaded into accounts at TheBus Pass Office or Customer Service Center, Satellite City Halls, and participating retail stores. Customers can also set up auto-reload.
- More efficient, expedited operations: Riders will simply tap their card upon entry which contributes to faster boarding at bus stops and reduces the time buses dwell at each stop.
- Flexibility and ability for future growth: The card allows for new emerging technology, additional methods of contactless and mobile payment options, and changes to transit fare structures.

Public Engagement Process

Public outreach was conducted through Neighborhood Boards (NB), community events, senior centers, high schools, news/radio stations, and the Honolulu Rate Commission.

In an effort to engage minority, low income, and LEP populations, translators were available to attend meetings upon request, important documents and key initiative content were available for translation upon request, and methods for individuals to request translation assistance was included on all meeting notices.

The following activities to further engage minority, low income, and LEP populations will be conducted:

- Broadly communicate continued acceptance of cash payment on all vehicles for a single one-way fare, while educating cash paying customers of new and better options available with HOLO.
- Coordinate outreach with community-based organizations, social service agencies, and schools to engage minority, low-income, and Limited English Proficient (LEP) riders.

The timeline below outlines public engagement activities for HOLO.

April 2018:	Public notification that DTS is demonstrating HOLO for the Rate Commission's monthly meeting on 4/10/18. DTS and HART provided detail on HOLO and demonstration project, and responded to commission questions. No testimony received.

June to
November 2018: Informational briefings and meetings conducted at the following events: NB meetings (Nuuanu and Makiki), community events (2 HART Train Days, Auto Show, 2 Kakaako Night Markets, and Chinatown Chinese New Year), senior centers (Koko Head, Lanakila, and Kahuku), High Schools (Waipahu and Kapolei), morning news shows (Hawaii News Now, KITV, and KHON), Hawaii Public Radio, newspaper articles in the Honolulu Star Advertiser & Midweek, and the Honolulu Rate Commission (4/10/18 and 9/4/18).

December 2018: HOLO pilot project launched.

Title VI Policies

DTS Major Service & Fare Change Policy and Disparate Impact & Disproportionate Burden Policies was used to determine if the proposed migration to HOLO will have a disparate impact or disproportionate burden to the ridership that self-identifies as minority or low income respectively.

Fare Change Policy: All fare changes requires DTS to perform a fare equity analysis during the planning process and six (6) months prior to implementation. Full public implementation is scheduled for July 1, 2019.

Disparate Impact Policy: DTS determines disparate impact when adverse effects of a fare change disproportionately affects minority riders more than non-minority riders. Disparate impact occurs when the threshold for determining adverse effects exceeds a 10% difference between the proportion of the affected minority and non-minority ridership.

Disproportionate Burden Policy: DTS determines disproportionate burden when adverse effects of a fare change disproportionately affects low income riders more than non-low income riders. Disproportionate burden occurs when the threshold for determining adverse effects exceeds a 10% difference between the proportion of the affected minority and non-minority ridership.

Analysis Framework

Although fares are not being increased and the single one-way cash fare will still be available, the migration to HOLO may adversely impact riders who use the one-day bus pass, which will not be available for purchase on-board buses, as is the current practice. Aside from the single one-way cash fare and the one-day bus pass, all other fare media are currently passes or IDs that are purchased at one or more of the following bus pass network locations, depending on the type of fare media.

- TheBus Pass office located at the Kalihi Transit Center.
- Participating retail vendors (approximately 90 located across Oahu).
- Nine (9) Satellite City Halls.

As an electronic version of the current bus pass or ID, a rider's initial* or replacement* HOLO will be purchased at the same network locations listed above, therefore; the migration is anticipated to have less adverse impact for these riders, if any at all. (*During the initial full public implementation period estimated to be six months to a year, HOLO will be distributed and provided free of charge. After the implementation period, a card fee, to be determined, may be charged.)

Access and availability of HOLO for current one-day pass riders will be compared to determine if the change in fare media adversely affects minority and/or low income riders disproportionately more than non-minority and/or non-low income riders.

Methodology: Ridership survey data from TheBus Demographic and Fare Media Ridership Survey (2018) was used to determine minority and low income proportions for the fare media payment categories. Table 1 shows the proportion of TheBus ridership that self-identified as minority and/or low income and Table 2 shows the fare media payment categories used by TheBus ridership. Of the 86% minority and/or low income riders, 49% use the Adult Pass, 10% use the One-day Pass, 9% use the Senior Pass, 7% use the Disability Pass, 5.5% use the U-Pass, 4% pay the Single One-way Cash Fare, and 1.5% use the Handi-van Pass.

Table 1: Percentage of system-wide passenger data

Minority	Low Income	Minority/Low Income	Overall
54%	5%	27%	14%

(Source: TheBus Demographic and Fare Media Ridership Survey, SMS Research, December, 2018)

Table 2: TheBus Ridership Fare Media Usage

Fare Media	Minority	Low Income	Minority/Low Income	Overall	Total
Single 1-Way	1.0%	1.0%	2.0%	1.0%	5.0%
1-Day Pass*	5.0%	1.0%	4.0%	5.0%	15.0%
Adult Pass	31.0%	2.0%	16.0%	5.0%	54.0%
Disability Pass	2.0%	1.0%	4.0%	0.5%	7.5%
Senior Pass	5.0%	1.0%	3.0%	2.0%	11.0%
Hand-Van Pass	0.5%	0.5%	0.5%	0.0%	1.5%
U-Pass	2.0%	0.5%	3.0%	0.5%	6.0%
Total	46.5%	7.0%	32.5%	14.0%	100.0%

(Source: TheBus Demographic and Fare Media Ridership Survey, SMS Research, December, 2018)
*Adult usage only, SMS Research policy precludes the survey of Youth.

Assessing Impacts

Disparate Impact and Disproportionate Burden: Although One-day Pass riders are most likely to be adversely affected by the migration to HOLO based on reduced access and availability since such passes will no longer be sold on-board buses and must be purchased at HOLO network locations; these riders will benefit from the numerous advantages that a smart card offers.

HOLO benefits all other riders who purchase the remaining fare media types except the single one-way cash fare rider. However, there are no changes to the single one-way cash fare.

DTS determines disparate impact and/or disproportionate burden when adverse effects of a fare change disproportionately affects minority and/or low income riders more than the overall riders by >10%. Although, the majority (87%) of TheBus riders self-identified as minority and/or low income, only 10% are One-day Pass riders, while 5% of the overall riders use the One-day Pass. The difference of 5% does not exceed the 10% threshold, therefore, the migration to HOLO does not adversely affect minority and/or low income riders disproportionately.

Benefits of HOLO: The following smart card system features benefits all TheBus Riders:

1. Cards will be distributed free of charge during the full public implementation period, estimated to be six months to one year; then a minimal card fee (to be determined) will apply to cover production costs and incentivize riders to retain and register their cards.
2. No regular service fee or charge for using HOLO.
3. Linked to an account that contains stored value. Registration protects against loss or theft, allows automatic reload, and provides capability to easily load value/purchase passes, and manage balances/multiple cards for a family or group.
4. Value can be deposited/loaded via cash or credit/debit card into the account at current bus pass network locations, on-line, by phone, or by automatic reload.
5. Grace period allows riders who board an incorrect bus to exit the wrong bus and board the correct bus without an additional charge.
6. Provides an integrated mass transit fare system when rail becomes operational.
7. Increased rider convenience.
8. More efficient, expedited operations.
9. Flexibility and ability for future growth.
10. Provides capability to implement Fare Cap Policy and re-institute free transfers.

Fare Equity Analysis: While there is no disparate impact or disproportionate burden to minority and/or low income riders with the migration to HOLO, one-day passes will no longer be sold on-board buses, affecting those riders with the loss of a readily available and convenient means to purchase fare media. However, the benefits of HOLO far outweigh the loss of on-board availability, especially if the fare cap and free transfer policies are implemented. Additionally, since bus fares are not time or distance-based, the cost benefit is greater for riders who live in outlying areas with longer commutes and more transfers to reach destinations. According to DTS' 2016 Title VI Program report, a majority of the minority and low income Census block groups are located outside of urban Honolulu in outlying communities.

CITY COUNCIL
CITY AND COUNTY OF HONOLULU
HONOLULU, HAWAII

CERTIFICATE

RESOLUTION 19-90

Introduced: 04/16/19 By: ANN KOBAYASHI – BY REQUEST Committee: TRANSPORTATION

Title: RESOLUTION APPROVING THE DEPARTMENT OF TRANSPORTATION SERVICES 2019 PUBLIC TRANISIT TITLE VI PROGRAM PURSUANT TO THE FEDERAL TRANSIT ADMINISTRATION TITLE VI CIRCULAR 4702.1.B REQUIREMENTS AND GUIDELINES.

Voting Legend: * = Aye w/Reservations

04/25/19	TRANSPORTATION	CR-142 – RESOLUTION REPORTED OUT OF COMMITTEE FOR ADOPTION. 5 AYES: ANDERSON, FORMBY, MANAHAN, PINE, ELEFANTE. 1 EXCUSED: MENOR.
		NOTE: COUNCILMEMBER WATERS TOOK OFFICE ON MONDAY, MAY 6, 2019.
05/08/19	COUNCIL	CR-142 AND RESOLUTION 19-90 WERE ADOPTED. 8 AYES: ANDERSON, ELEFANTE, FUKUNAGA, MANAHAN, MENOR, PINE, TSUNEYOSHI, WATERS. 1 ABSENT: KOBAYASHI.

I hereby certify that the above is a true record of action by the Council of the City and County of Honolulu on this RESOLUTION.

GLEN I. TAKAHASHI, CITY CLERK

IKAIKA ANDERSON, CHAIR AND PRESIDING OFFICER