

A photograph of a city street scene. In the foreground, a white and blue tram is moving along a track. To the right, a tall, vertical sign reads "SHEA'S BUFFALO". In the background, there are modern buildings with glass facades and trees. The text "Title VI Program" is overlaid in the center of the image.

# Title VI Program

2018 Update

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# Executive Summary

The Niagara Frontier Transportation Authority (NFTA) is a regional multi-modal transportation agency responsible for air and surface transportation for Erie and Niagara Counties in Western New York. The cities of Buffalo and Niagara Falls are the urban core of the region.

NFTA is committed to ensuring that no person is excluded from participation in or denied the benefits of, or be subject to discrimination in the receipt of its services on the basis of race, color or national origin as protected by Title VI of the Civil Rights Act of 1964, as amended.

The Federal Transit Administration requires that all recipients of federal transit funding submit a compliance report every three years as outlined in the Federal Transit 's October 2012 Circular 4702.1B (Title VI Requirements and Guidelines for Federal Transit Administration Recipients). Additionally, this circular contains other requirements for those transit agencies that provide service within urbanized areas with over 200,000 in population, such as the Buffalo-Niagara area. This 2018 report adheres to the prescriptive Federal processes and requirements for the development of a Title VI program.

As the following 2018 Title VI Program shows, the NFTA has a fair distribution of transit services for the various populations in its service area. NFTA service coverage includes Census Tracts with higher populations of minorities, elderly, LEP, and low-income populations to ensure that no group be excluded from transit services. NFTA firmly believes in the goals and objective of Title VI and has developed this Title VI program to comply with the mandates.

# Summary of 2018 Title VI Submission Changes

The following is an outline of the full Title VI program and a summary of changes since the 2015 program submission.

*Chapter 1: Notify Beneficiaries of Protection Under Title VI* – no changes to the notification, posting is available in all NFTA facilities.

*Chapter 2: Complaint Procedures* – no changes to the procedures, a Spanish complaint form was developed since the 2015 submission.

*Chapter 3: Investigations, Complaints and Lawsuits* – NFTA does not have any Title VI investigations, complaints or lawsuits to report in this submission.

*Chapter 4: Promoting Inclusive Public Participation* – no changes have been made to the Public Participation Plan. This chapter outlines community meetings held since 2015 and one hearing conducted for the fare policy.

*Chapter 5: Meaningful Access to LEP Persons* - there is no significant difference in LEP population since the last submission. There has been a slight increase in the cost to provide Language Line services. Of the languages other than English, Spanish is still the largest. Through continued monitoring and outreach, NFTA has not identified any language barriers.

*Chapter 6: Minority Representation on Planning and Advisory Boards* - there has been some change to CAC member organizations since the last submission however minority representation through self-identification by members is still 50%.

*Chapter 7: Subrecipient Assistance and Oversight* – the procedures for subrecipient assistance have not changed since the last submission. Oversight is ongoing for three subrecipients. The United Way of Erie and Niagara County was added since 2015.

*Chapter 8: Determination of Site of Location of Facilities* – NFTA has not sited or constructed any new facilities since 2015.

*Chapter 9: System-wide Service Standards and Policies* – NFTA's service standards have not changed since the last submission, evaluation of distribution of amenities shows no disparate impact.

*Chapter 10: Collect and Report Demographic Data* – review of current census information shows there are slight changes in demographics. Since the last submission, NFTA conducted an on-board survey, the results of which have been included in this chapter.

*Chapter 11: Monitor Transit Service* – the results of the monitoring program identified minority and non-minority routes and evaluated them against service standards for disparities. The result shows that service is delivered with no disparate impact.

*Chapter 12: Evaluate Service and Fare Changes* – NFTA conducted a Title VI Fare and Equity Analysis for the Proposed Fare Structure, which included two public hearings. The review did not result in a disparate impact. There were no major service changes to evaluate.

# Chapter 1: Notify Beneficiaries of Protection under Title VI

*Requirement: Title 49 CFR Section 21.9(d) 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 or stops, and/or on transit vehicles.*

## **Response:**

NFTA's Notice to Beneficiaries is posted throughout all NFTA Facilities including reception desk, meeting rooms, stations, transit vehicles (buses, trains) and on our website (nfta.com). NFTA has multiple sub-recipients, all which have their notice posted as well. A list of locations is included below.

NFTA's notice is translated into Spanish and is attached.

### **NFTA Title VI Notice Posting Locations**

- All Revenue Vehicles (Buses & Paratransit and Rail Cars)
- Conference Rooms
- Website
- Rail Station
- Reception Desk (MTC)
- Frontier Station
- Babcock Station
- Cold Spring Station
- Niagara Falls Transportation Center

### **Sub-recipients Title VI Notice**

Sub-recipient notices are posted on their websites, corporate compliance document, offices, facilities, vehicles, employee's handbook, program brochures and program intake documents. Current subrecipients are listed below:

- Heritage Center
- Buffalo Niagara Medical Campus
- Western New York Independent Living
- Amherst Senior Transportation Services
- Go Buffalo Mom (a program associated with the United Way)

Figure 1 - Notice to Beneficiaries

## **Niagara Frontier Transportation Authority**

### **Title VI**

#### **Your Rights Under Title VI of the Civil Rights Act of 1964**

“No person in the United States shall, on the ground 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.”

NFTA is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or be subject to discrimination in the receipt of its services on the basis of race, color or national origin as protected by Title VI of the Civil Rights Act of 1964, as amended. For additional information please call 716-855-7486.

If you believe you have been subjected to discrimination under Title VI, you may file a written complaint with the NFTA Equal Employment Opportunity Office, located at 181 Ellicott Street, Buffalo, NY 14203, or visit the public information section on NFTA.com.

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building 5<sup>th</sup> Floor-TCR 1200 New Jersey Ave, SE Washington, DC 20590

Figure 2 - Notice Posted in Facilities

## **Your Rights Under Title VI of the Civil Rights Act of 1964**

**NFTA is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or be subject to discrimination in the receipt of its services on the basis of race, color or national origin as protected by Title VI of the Civil Rights Act. If you believe you have been subjected to discrimination under Title VI, you may file a written complaint with the NFTA Equal Employment Opportunity Office, located at 181 Ellicott Street, Buffalo, NY 14203, or visit the public information section of [nfta.com](http://nfta.com).**

*NFTA está comprometido a garantizar que ninguna persona sea excluida de participar en, o negado los beneficios de, o que sea sujeto a discriminación al recibir servicios en base a raza, color u origen nacional como protegidos por el Título VI de los Derechos Civiles. Si usted cree que ha sido sujeto a discriminación bajo el Título VI, puede presentar una queja por escrito ante la Oficina de Igualdad de Oportunidades de Empleo de NFTA, ubicada en 181 Ellicott Street, Buffalo, NY 14203 o visite la sección de información pública de [nfta.com](http://nfta.com).*



Niagara Frontier Transportation Authority  
Serving Buffalo Niagara

Figure 3 - Notice Posted in Vehicles

<p>NFTA is committed to ensuring that no person is excluded from participation in, denied the benefits of, or be subject to discrimination in the receipt of its services on the basis of race, color or national origin as protected by Title VI of the Civil Rights Act of 1964, as amended. If you believe you have been subjected to discrimination under Title VI, you may file a written complaint with the NFTA Equal Employment Opportunity Office, located at 181 Ellicott Street, Buffalo, NY 14203 or visit the public information section of <a href="http://nfta.com">nfta.com</a>.</p>		<p><i>NFTA está comprometido a asegurar que a ninguna personas se le excluirán, se le negarán los beneficios, o que sean sujetos de la discriminación al recibir los servicios con base en la raza, el color, o el origen nacional, protegido por Título VI del Acto de los Derechos Civiles de 1964, modificado. Si piensa que ha estado sujeto a discriminación bajo el Título VI, puede presentar una denuncia con la Oficina de la Igualdad de Oportunidades de Empleo del NFTA, situada en 181 Ellicott Street, Buffalo, NY 14203 o visite la sección de información pública de <a href="http://nfta.com">nfta.com</a>.</i></p>
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## Chapter 2: Complaint Procedures and Form

***Requirement: 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. 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.***

### **Response:**

Title VI Complaint Procedures are distributed and posted throughout all NFTA properties and NFTA website (nfta.com). Attached is the complaint procedure and form.

### **NFTA Title VI Complaint Procedure**

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the Niagara Frontier Transportation Authority may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. The Niagara Frontier Transportation Authority investigates complaints received no more than 180 days after the alleged incident. The Authority will process complaints that are complete.

All complaints submitted to the Niagara Frontier Transportation Authority are investigated. The Authority has 45 days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the EEO office. If the EEO office is not contacted by the complainant or does not receive the additional information within 10 business days, the Authority can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding. A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A letter of finding summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has 30 days after the date of the letter or the letter of finding to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Ave., SE, Washington, DC 20590 or with New York State Department of Human Rights.

Figure 4 - Civil Rights Complaint Procedure



### **Civil Rights Complaint Procedure**

Management recognizes the right of every employee and customer to file an external complaint, independent of any action the complainant may wish to take or not take, with the Director of Equal Employment Opportunity/Diversity Development or designated representative.

However, to insure prompt, fair and impartial internal processing of complaints alleging discrimination;

A complainant is urged to use the opportunity for internal discussion of grievances and to consult with the Director of EEO/Diversity Development or designated representative prior to filing a formal complaint of discrimination with State of New York Division of Human Rights, the U.S. Equal Opportunity Commission and/or appropriate federal department(s).

Such consultation should be made within 10 calendar days from the date of alleged discriminatory act unless the discrimination is continuing in which case the complainant should consult with the Director of EEO/Diversity Development or designated representative as soon as convenient. Any employee or customer who is of the belief that he/she has been discriminated against because race, color, religion, national or ethnic origin, age, alienage, citizenship, ancestry, gender, genetic disposition, or carrier status, sexual orientation, marital status, liability for service in the Armed Forces of the United States, arrest/conviction record, or disability should consult with the Director of EEO/Diversity Development or designated representative in an effort to resolve the matter informally.

The Director of EEO/Diversity Development or designated representative will:

1. Make necessary inquiries to seek a resolution of the matter on an informal basis.
2. Have access to officials at all levels when looking into an equal employment opportunity matter in an attempt to resolve/conciliate it.
3. Discuss with an appropriate official the findings and his/her recommendations for a resolution of the problem.
4. Process the complaint to informal resolution within 45 days after the matter is brought to his/her attention.
5. Supervisors at all levels shall insure that the Director of EEO/Diversity Development or designated representative receives full cooperation at all levels when handling equal opportunity complaints.
6. Assure that a complainant may file written complaints with the Director of EEO/Diversity Development and these will be investigated by same.
7. The Director of EEO/Diversity Development will have access to all records, documents, memoranda, etc. necessary to conduct a review of the complaint.
8. The Director of EEO/Diversity Development will respond to formal written complaints with a written report of findings and recommendations for resolving same.
9. Assure appropriate follow-up is conducted after complaints are settled to forestall and correct harassment or retaliatory actions against the employee.
10. Make periodic checks to assure that agreed upon corrective action is continuing or has been taken.
11. Analyze employee complaints, formal or informal, in order to identify conditions and circumstances that may exist beyond the individual case which require further investigation.
12. Recommend corrective action where an investigation reveals discriminatory action by a supervisor to the Executive Director.
13. Assure the "Complaint Procedures" are posted on all employee bulletin boards, together with information as to where and with whom complainants should file their civil rights complaints.

### Procedimiento de queja del Título VI de NFTA

Cualquier persona que crea que ha sido discriminada por motivos de raza, color o origen nacional por la Autoridad de Transporte de la Frontera del Niágara puede presentar una queja del Título VI completando y enviando el Formulario de Quejas del Título VI de la agencia. La frontera de Niágara La Autoridad de Transporte investiga las quejas recibidas no más de 180 días después de lasupuesto incidente. La Autoridad procesará las quejas que estén completos.

Todas las quejas presentadas a la Autoridad de Transporte de la Frontera del Niágara son investigadas. Los La autoridad tiene 45 días para investigar la queja. Si se necesita más información para resolver el caso, la Autoridad puede contactar al demandante. El demandante tiene 10 días hábiles desde la fecha de la carta para enviar la información solicitada a la oficina de EEO. Si la oficina de EEO no está contactado por el demandante o no recibe la información adicional dentro de 10 negocios días, la Autoridad puede cerrar administrativamente el caso. Un caso puede ser cerrado administrativamente también si el demandante ya no desea continuar con su caso.

Después de que el investigador revisa la queja, él / ella emitirá una de dos cartas a la demandante: una carta de cierre o una carta de hallazgo. Una carta de cierre resume las acusaciones y declara que no hubo una violación del Título VI y que el caso se cerrará. Una carta de finding resume las acusaciones y las entrevistas sobre el presunto incidente, y explica si alguna medida disciplinaria, capacitación adicional del miembro del personal u otra acción ocurriera. Si el demandante desea apelar la decisión, él / ella tiene 30 días después de la fecha de la carta o la letra de encontrar para hacerlo.

Una persona también puede presentar una queja directamente con la Administración Federal de Tránsito, en el TLC  
Oficina de Derechos Civiles, 1200 New Jersey Ave., SE, Washington, DC  
20590 o con el Estado de Nueva York  
Departamento de Derechos Humanos.

Para las quejas de discriminación relacionadas con el aeropuerto:

Una persona también puede presentar una queja directamente con la Administración Federal de Aviación, Oficina de  
Derechos Civiles, ACR - 1, 800 Independence Ave., SW, Washington, DC  
20591.

Figure 5 - Complaint Form

**Title VI Complaint Form  
Niagara Frontier Transportation Authority (NFTA)**

*"NFTA is committed to ensuring that no person is excluded from participation in or denied the benefits of, or be subject to discrimination in the receipt of its services on the basis of race, color or national origin as protected by Title VI of the Civil Rights Act of 1964, as amended."*

**Title VI complaints must be filed within 180 days from the date of the alleged discrimination.**

Section I	
Name:	_____
Address:	_____
City:	_____ State: _____ Zip Code: _____
Telephone (Home):	_____ Telephone (Work): _____
Section II	
Are you filing this complaint on your own behalf?	<input type="checkbox"/> Yes* <input type="checkbox"/> 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 what 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.	
<input type="checkbox"/> Yes: <input type="checkbox"/> No:	
Section III	
Were you discriminated against because of (check all that apply)	
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin	
Date of Alleged Incident: _____	
Explain as clearly as possible what happened and how you were discriminated against. Indicate who was involved. Be sure to include the names and contact information of any witnesses. If more space is needed, please use the back of the form.	
_____	
_____	

<b>Section IV</b>		
Have you previously filed a Title VI complaint with this agency? <table style="float: right; border: 1px solid black;"> <tr> <td style="padding: 2px 10px;">Yes:</td> <td style="padding: 2px 10px;">No:</td> </tr> </table>	Yes:	No:
Yes:	No:	
<b>Section V</b>		
Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court? <input type="checkbox"/> Yes <input type="checkbox"/> No  If yes, check all that apply:  <input type="checkbox"/> Federal agency <input type="checkbox"/> Federal court <input type="checkbox"/> State agency <input type="checkbox"/> State court <input type="checkbox"/> Local agency		
Please provide information about a contact person at the agency/court where the complaint was filed.  Name: _____  Address: _____  City: _____ State: _____ Zip Code: _____  Telephone Number: _____		

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

Signature and date required below

\_\_\_\_\_

SignatureDate

If you have any questions or need assistance completing this form, please contact EEO/Diversity Development office at (716) 855-7486.

The completed form must be returned to:

Christine Farrow, Ph.D., Manager  
 EEO/Diversity Development  
 Niagara Frontier Transportation Authority  
 181 Ellicott Street  
 Buffalo, New York 14203

**Formulario de queja del Título VI  
Autoridad de Transporte de la Frontera del Niágara (NFTA)**

“NFTA se compromete a garantizar que ninguna persona sea excluida de la participación o se le nieguen los beneficios de, o ser objeto de discriminación en la recepción de sus servicios en función de la raza, el color o el origen nacional como está protegido por el Título VI de la Ley de Derechos Civiles de 1964, según enmendada “. *Las quejas del Título VI deben presentarse dentro de los 180 días a partir de la fecha de la supuesta discriminación.*

Seccion I
Nombre: _____
Dirección: _____
Raza: _____ Estado: _____ Código Postal: _____
Telefono (casa): _____ Telefono (trabajo): _____
Seccion II
¿Está presentando esta queja en su propio nombre? <input type="checkbox"/> Si* _____ <input type="checkbox"/> No: _____
*Si respondió “Sí” a esta pregunta, vaya a la Sección III
Si no es así, proporcione el nombre y la relación de la persona por la que se queja: _____
Por favor explique lo que ha archivado para un tercero : _____ Por favor confirme que ha obtenido el permiso de la parte perjudicada si está presentando nombre de un tercero. <input type="checkbox"/> Si: _____ <input type="checkbox"/> No: _____
Seccion III
¿Fue discriminado por (marque todo lo que corresponda) <input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen nacional
Fecha de presunto incidente: _____
Explique con la mayor claridad posible qué sucedió y cómo fue discriminado. Indique quien estaba involucrado. Asegúrese de incluir los nombres y la información de contacto de los testigos. Si necesita más espacio, use la parte de atrás del formulario. _____ _____ _____ _____
Seccion IV
¿Ha presentado anteriormente una queja del Título VI con esta agencia? <input type="checkbox"/> Si: _____ <input type="checkbox"/> No: _____
Seccion V
¿Ha presentado esta queja ante cualquier otra agencia federal, estatal o local? o con cualquier o tribunal federal o estatal? <input type="checkbox"/> Yes <input type="checkbox"/> No
En caso afirmativo, marque todo lo que corresponda: <input type="checkbox"/> Agencia federal <input type="checkbox"/> Tribunal federal <input type="checkbox"/> Agencia estatal <input type="checkbox"/> Tribunal estatal <input type="checkbox"/> Agencia local

Proporcione información sobre una persona de contacto en la agencia / tribunal donde se presentó la queja.

Nombre: \_\_\_\_\_

Dirección: \_\_\_\_\_

Ciudad: \_\_\_\_\_ Estado: \_\_\_\_\_ Código Postal: \_\_\_\_\_

Número de teléfono: \_\_\_\_\_

Puede adjuntar cualquier material escrito u otra información que considere relevante para su queja.

Firma y fecha requeridas a continuación.

\_\_\_\_\_

Firma

Fecha

Si tiene alguna pregunta o necesita ayuda para completar este formulario, contáctese con EEO/ Oficina de Desarrollo de la Diversidad (716) 855-7486

El formulario completo debe devolverse a:  
Christine Farrow, Ph.D., Gerente  
EEO / Desarrollo de la Diversidad  
Autoridad de Transporte de la Frontera del Niágara  
181 Ellicott Street  
Buffalo, Nueva York 14203

## Chapter 3: Investigations, Complaints and Lawsuits

*Requirement: 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 entities other than FTA; lawsuits; and complaints naming the recipient. This list shall include the date that the investigation, lawsuit, or complaint was filed; a 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.*

### Response:

NFTA has not had any investigations, lawsuits or complaints since the last submission.

*Figure 6- Summary of Lawsuits and Complaints*

<b>Investigations, Lawsuits and Complaints</b>				
<b>Investigations:</b>	<b>Date</b>	<b>Summary</b>	<b>Status</b>	<b>Action Taken</b>
None				
<b>Lawsuits:</b>	<b>Date</b>	<b>Summary</b>	<b>Status</b>	<b>Action Taken</b>
None				
<b>Complaints:</b>	<b>Date</b>	<b>Summary</b>	<b>Status</b>	<b>Action Taken</b>
None				
<p>Any person may file a complaint with NFTA if said person feels she/he has been discriminated against. A person may also file a complaint directly with either the Federal Transit Administration or the Department of Human Rights.</p>				

## Chapter 4: Promoting Inclusive Public Participation

***Requirement: In order to integrate, into community outreach activities, considerations expressed in the DOT Order on Environmental Justice, and the DOT LEP Guidance, recipients and sub recipients should seek out and consider the viewpoints of minority, low-income, and LEP populations in the course of conducting public outreach and involvement activities. An agency's public participation strategy shall offer early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions.***

### **Response:**

The NFTA has a long-standing practice of interacting with individuals, community groups, grassroots organizations and minority and LEP populations. Understanding the importance of inclusive public participation, the NFTA developed a public participation program to guide engagement with our passengers and specifically our minority and LEP passengers. NFTA develops rider alerts that contain pertinent information that are placed in all buses, transit centers, rail stations and are distributed directly to LEP and EJ organizations. When scheduling meetings, NFTA coordinates with community organizations to determine the best times and locations that are convenient and accessible for minority and LEP populations.

The NFTA also solicits public comments through formal public hearings, and encourages submission of written comments by letter, e-mail or notification in established print media and community newspapers. The NFTA also conducts stakeholder meetings, public workshops and informal discussions to solicit public comments on NFTA projects.

In 2012, NFTA established a Citizens Advisory Committee (CAC) comprised of a total of 25 individuals that meet bi-monthly. Input is solicited from the CAC members on many NFTA projects. The CAC consists of transit riders and individuals representing minority and LEP groups. Currently 50% of the CAC is self-identified as minority.

In line with industry best practices– NFTA is undertaking new community engagement methods to go above and beyond requirements, to address the dynamic change in community needs, to increase transparency and to create opportunities for new initiatives. Efforts include:

- Participation in the Erie County Fair and other community events
- Customer Appreciation Nights
- Customer Surveys

The Public Participation Plan which describes these efforts in more detail is included at the end of this chapter.

### **Major Service and Fare Changes:**

In the case of a major service and/or fare change, NFTA follows the process outlined in the Policy for Soliciting of Public Comment and Conducting a Title VI Service and Fare Equity Analysis on Transit Service and Fare Changes, adopted March 26, 2012 and reaffirmed April 24, 2014 by the Board of Commissioners and incorporated into the Public Participation Plan.

In order to develop a more efficient transit network, Metro regularly monitors service performance by collecting objective information on route ridership and productivity. The NFTA also works to accommodate service requests received from the community.

While the NFTA did not make any services changes that would qualify as a major service change per our policy, community meetings were held for some service adjustments.

The following is a list of the service related public meetings NFTA conducted since the last Title VI submission. During outreach periods, service change information was provided on the NFTA website and the public was given the opportunity to comment. Meetings are advertised via the NFTA website, Rider Alerts, newspaper announcements, and through social media.

- Route 11 – Colvin Service Adjustment
  - March 2, 2016, 6:30pm @ Nichols School, Buffalo
- Route 1-William, Route 2-Clinton and Route 4-Broadway Service Adjustments
  - May 31, 2017, 6pm @ Belle Center, Buffalo
- Lackawanna Service Enhancements
  - January 19, 2017, 5:30pm @ Willie Cotton Center, Lackawanna
  - December 12, 2017, 5:30pm @ Baker Hall School, Lackawanna

#### **Other Outreach Opportunities:**

NFTA has various project specific outreach efforts that are ongoing and are summarized below. All projects described below are reported to both the NFTA Board of Commissioners and the Citizens Advisory Committee on a regular basis. Each project has provided a unique opportunity to include the public and has resulted in new partnerships.

#### Fare Collection System

Metro Bus and Rail is in the process of developing a new fare collection system. The new system will use advanced technology to make accessing public transit faster, easier to use and more flexible. The project objectives are to replace fare boxes and ticket vending machines, install new fare gates within underground rail stations and introduce MetGo which is a smart card used to access the transit network.

The upgrade is not expected to be in place until the spring of 2019, but planning and public outreach has begun. NFTA Metro staff developed a brochure to introduce the project to the public. A fare collection survey was conducted in the Fall of 2015 to solicit public input on specific aspects of the project. Two focus groups were held on September 14, 2016, 2-4pm and 6-8pm at NFTA's Metropolitan Transportation Center.

A significant component of the project was the development of a new fare policy. During the development of the new policy which includes the introduction of new fare media, public input was sought, a Title VI Analysis was conducted and official public hearings were held regarding the new policy on:

- August 31, 2016, 6pm @Niagara Falls City Hall
- September 1, 2016 6pm @ Buffalo and Erie County Library, Buffalo

Public hearings were advertised in newspapers, Metro Rider Alerts, NFTA website, Instant Updates and news releases.

The roll out of the new system will require a major public outreach and educational campaign, for which NFTA will contract with a marketing consultant to develop and implement. The campaign will consider and plan outreach to minority, low income and LEP populations.

#### LRT Extension

NFTA concluded an Alternatives Analysis in January 2017 when the Board of Commissioners adopted the Locally Preferred Alternative of extending LRT from the current terminus at South Campus Station through the Town of Amherst to the University at Buffalo North Campus and ending at the I-990 interchange and Audubon Parkway. NFTA is currently completing an Environmental Impact Statement (EIS) under NEPA and SEQR. The NFTA will develop a robust Public Involvement Plan (PIP) that will go above and beyond the required scoping meetings and public hearings. The plan will establish a project technical advisory committee, stakeholder committee, agency coordination plan and an outline of the methods the project will employ to gain valuable feedback from the public.

#### Canalside/Cobblestone Access Study

NFTA completed a study that looked at enhancing transit access to serve existing and proposed development in the Canalside and Cobblestone Districts, support reuse of the DL&W Terminal, expand opportunities for increased revenue that support public transit, and create opportunities for future transit expansion. A steering committee consisting of NFTA staff and major stakeholders was established and met throughout the duration of the study. In addition, as part of the outreach efforts, meetings were held with several government, business, and community stakeholders involved in the Canalside or Cobblestone Districts. This significant stakeholder outreach occurred during the fall of 2014 and was previously reported. Prior to selecting and adopting a locally preferred alternative for this project, a public information session was held to present and receive feedback on the two alternatives under consideration. The meeting was advertised on the project's website, via a rider alert, meeting flyer and through social media. The meeting was held on October 15, 2015, 5pm – 7pm at the Atrium at First Niagara Center.

This project is now in the design phase and while there are no public meetings currently scheduled, the project team has continuously met with major stakeholders.

#### Community Thursdays at Utica

During the Summer of 2016, NFTA hosted “Community Thursdays” at the Utica metro rail station. Each Thursday from June 23<sup>rd</sup> – August 25<sup>th</sup> various vendors tabled at the station to bring their services to the neighborhood and surrounding residents. Sixteen vendors participated including – WNY Law Center, Catholic Health, Veteran’s One Stop Center, GBUAHN, Witness Project among others.

#### Erie and Niagara County Service Plan

Completed in the summer of 2016, the Erie and Niagara County Service Plan sought to update service plans for Erie and Niagara Counties through a consolidated study of network service alternatives designed to improve performance. The service plan study established strategies designed to make the bus system in Erie and Niagara Counties more efficient and cost effective, and increase bus ridership. Steering and Advisory Committees were established to solicit feedback on service recommendations. In addition, the NFTA held four public listening sessions to gain valuable feedback that helped inform the service recommendations. The sessions were held on:

- October 19, 2015, 3:30-5pm @ Buffalo and Erie County Central Library
- October 20, 2015, 4:30-6pm @ Walden Galleria

- October 21, 2015, 4:30-6pm @ McKinley Mall
- October 22, 2015, 4:30-6pm @ Portage Road Transportation Center

### Community Conversations

During 2016, NFTA and the Oshei Foundation's Mobile Safety Net Team (MSNT) partnered to host five community conversations across our two-county service area. The MSNT reached out to NFTA to offer their expertise in community partnerships to develop a series of conversations to foster transparency and build relationships with riders and community members. MSNT coordinated the meeting dates, times and locations based on their knowledge of each community and advertised the meetings accordingly. The meetings were held on:

- March 22, 2016, 1-3pm @ St. Lawrence Parish – North East Buffalo
- April 21, 2016, 1-3pm @ Matt Urban HOPE Center – Buffalo East
- June 22, 2016 10am – 12pm @ Belle Center – Buffalo Westside (Spanish translation provided)
- November 15, 2016, 10am -12pm @ Doris Jones Family Resource Center – Niagara Falls
- January 24, 2017 6-7:30pm @ NW Buffalo Community Center – Blackrock

### Allen Medical Station Closures

During construction of UB's School of Medicine and Biomedical Science above Allen Medical Station, temporary station closures were necessary which impacted access for our customers. In April 2017, a two-week period of nightly station closures occurred. NFTA created a public outreach plan to mitigate rider impacts during general construction and closures. During the closures NFTA implemented the following to inform riders of the impacts:

- o Post Rider Alerts in all rail cars and buses regarding relocated stops and temporary station closures.
- o Implement Metro Bus Shuttle service when station was temporarily closed and when necessary. Metro Bus Shuttle schedules were posted and distributed as follows:
  - On All Revenue Vehicles (Bus, Rail, Paratransit)
  - In All Metro Rail Stations
  - On the NFTA Metro Website
  - Via NFTA Metro Instant Updates
- o NFTA-Metro staff was present at rail stations during peak hour periods to distribute information and explain and answer questions from passengers regarding the station closing and shuttle operation.
- o Systemwide station impact information was disseminated through major, local and community media outlets with detailed press releases.
- o Station closure and schedule impact information was emailed directly to community organizations including the Buffalo Urban League, Hispanics United, Journeys End Refugee Committee and The Citizens Action Organization of Erie County, to NFTA's CAC and Disabled Advisory Committee as well as the Buffalo Niagara Medical Campus Transit Demand Management group.

# NFTA Metro Public Participation Plan

The purpose of this document is to outline public participation policies and procedures to be used to disseminate information and to solicit and respond to public comment to the extent possible for development and review of programs and projects carried out by NFTA Metro.

Revised February 2015

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## Introduction

The Niagara Frontier Transportation Authority is a multimodal entity encompassing a skilled and dedicated work force. We are firmly committed to providing efficient and professional transportation services that enhance the quality of life throughout the Buffalo Niagara region in a manner consistent with the needs of our community.

The goal of the Niagara Frontier Transportation Authority is to enhance the quality of life of residents and visitors by providing the highest level of safe, clean, affordable, responsive, and reliable transportation through a coordinated and convenient bus and rail system.

## Goals and Objectives

The goal of the NFTA-Metro Public Participation Plan is to disseminate information and to solicit and respond to public comment on the development and review of programs and projects carried out by NFTA-Metro. To the extent possible, the goal is to provide opportunities for proactive, early and continuing public participation for projects, programs, and decision making to ensure that these programs reflect community values and benefit all segments of the community equally.

The objective of the Public Participation Plan is to go above and beyond what is required by law and to continue to expand NFTA's comprehensive outreach efforts by:

- Providing opportunities for public comment as required by law.
- Providing opportunities for public and stakeholder input.
- Providing opportunities for the inclusion of minority, low-income and LEP populations through public workshops and public information meetings.
- Establishing a formal Citizens Advisory Committee.

## Public Participation as Required by Law

### FTA Program-of-Projects Requirements and Section 5307 Grant Program

While a Federal Transit Administration grant applicant may choose to maintain a separate approach for complying with the public participation requirements of 49 U.S.C. Section 5307(c)(1) through (c)(7) concerning the applicant's proposed Section 5307 grant program, the grant applicant is encouraged to integrate compliance with these requirements with the locally adopted public involvement process associated with the TIP. Grantees that choose to integrate the two should coordinate with the MPO and ensure that the public is aware that the TIP development process is being used to satisfy the public hearing requirements of Section 5307(c). The grant applicant must explicitly state that public notice of public involvement activities and time established for public review and comment on the TIP will satisfy the program-of-projects requirements of the Urbanized Area Formula Program. A project that requires an environmental assessment or an environmental impact statement will involve additional public involvement, as presented in joint FHWA/FTA environmental regulations, "Environmental Impact and Related Procedures," 23 C.F.R. Part 771.

The NFTA works directly with the MPO, the Greater Buffalo-Niagara Regional Transportation Council (GBNRTC) to develop the TIP. The public involvement activities and the time established for public review and comment on the TIP satisfies the program-of-projects requirements of the Urbanized Area Formula Program.

#### American with Disabilities Act (ADA)

The American with Disabilities Act (ADA) of 1990 encourages the involvement of people with disabilities in the development and improvement of transportation and paratransit plans and services. In accordance with ADA guidelines, all meetings conducted by the NFTA take place in locations that are accessible to persons with mobility limitations. Also, auxiliary aids and services when necessary to ensure effective communication, unless an undue burden or fundamental alteration would result, must be furnished to allow a person with a disability to participate. "Auxiliary aids" include such services or devices as qualified interpreters, assistive listening headsets, television captioning and decoders, telecommunication devices for deaf persons (TDD's), videotext displays, readers taped text, brailled materials, and larger print materials. NFTA public meeting notices specify that special accommodations will be provided upon request.

#### Title VI Adherence

In addition to the previously discussed service evaluation procedures, Metro's planning process is sensitive to the needs of minority and low-income communities. As a federally funded transit provider, through the Federal Transit Administration, Metro has a responsibility to adhere to the objectives of Title VI of the Civil Rights Act of 1964. The objectives of the FTA Title VI program are as follows:

- To ensure FTA-assisted benefits and related services are equitably distributed without regard to race, color or national origin.
- To ensure that both the level and quality of transit services provide equal access and mobility for any person without regard to race, color or national origin.
- To ensure that access to the planning and decision-making process is open and without regard to race, color or national origin
- To ensure that decisions on the location of transit facilities and services are made without regard to race, color or national origin.

These objectives are the basis for the implementation of the FTA Title VI program. To comply with these objectives, Metro has adopted the suggested methodology and framework set forth in the Title VI reporting guidelines (FTA Circular 4702.1B, Chapter IV) for compliance assessment.

By using this methodology, Metro will monitor and compare performance of all its routes based on level of service and quality of service criteria. To facilitate this evaluation, Metro will continue to collect data relating to its service standards, such as load factor, vehicle assignment, frequency, and on time performance. These analyses will be conducted on a route-by-route basis, thus enabling a system-wide evaluation. The findings of these analyses will be used to modify service delivery, to bring it in line with the stated objectives of the Title VI program, where a variance exists. Metro has submitted a report to FTA, which documented the results of this methodology and showed Metro's compliance with the Title VI regulations. The FTA approved NFTA's current Title VI program on November 14, 2012.

In the event of a proposed fare or major service change, Staff will conduct a Service and Fare Equity Analysis required by FTA for compliance with Title VI of the Civil Rights Act of 1964 to assess the effects of such a change on minority and low-income populations during the planning of such changes which will address alternatives available for people affected by the changes. The Analysis will also apply the Disparate Impact threshold and the Disproportionate Burden threshold to the major service changes or changes in fares. The results of the Analysis will be reported to the NFTA Board prior to any public discussion or implementation of the proposed changes.

#### Limited English Proficiency (LEP)

To improve contact with Limited English proficiency populations, the NFTA website contains a language translator. Using "Google Translator" all pages can be viewed in multiple languages.

In addition, NFTA offers a service called Language Line for translation. All schedules are printed in Spanish. "I Speak" cards are available at points of contact with the public and universal symbols are used in the buses.

NFTA also includes organizations that represent LEP individuals as stakeholders in workshops, public hearings and the CAC.

#### Service Restructuring/Fare Analysis

NFTA will undertake a comprehensive and inclusive public participation and outreach process in the event of a major service or fare change. During the entire public outreach period, NFTA will post information and accept comments regarding the proposed change on the NFTA website. Prior to hosting formal public hearings on the proposed change, NFTA will hold multiple public information meetings in local communities; will hold stakeholder group meetings (a sample of stakeholders is listed below); and will present the changes to the NFTA Advisory Committee on the Disabled as well as the Citizens Advisory Committee. The purpose of such efforts is to include minority, low-income, and LEP populations in the planning stages of the change. NFTA's policy for the Soliciting of Public Comment and Conducting a Title VI Service and Fare Equity Analysis on Transit Service and Fare Changes is incorporated by reference and is included in Attachment A.

Stakeholders identified include, but are not limited to:

- City of Buffalo Common Council members
- Erie County Legislators
- Buffalo Urban League
- Community Action Organization of Erie County
- Buffalo Federation of Neighborhood Centers
- Hispanics United of Buffalo
- Homeless Alliance of Buffalo and Erie Co.
- United Way of Buffalo & Erie County
- Voice Buffalo
- Seneca Nation
- Buffalo & Erie County Workforce Development Consortium

### Ongoing Public Participation Opportunities

NFTA utilizes a variety of media and methods to provide interested individuals, groups, and organizations with timely information about transportation issues.

- NFTA website
  - The NFTA website ([www.nfta.com](http://www.nfta.com)) provides basic information about the NFTA, including NFTA-Metro. The website provides the most up to date information regarding fares, schedules, events, programs and news.

All public workshops, information meetings and hearings are advertised on the NFTA website. The website is also used as a medium in which riders and the public can provide comments during a study.
- Social Media
  - NFTA recognizes the prevalence of social media, and is in the process of implementing a Social Media Strategic Plan. Social media will be used to interact with individuals, groups, businesses and strategic partners to improve customer service satisfaction. Once implemented, it will also be used as another method of public participation and information sharing and gathering
- Instant Updates
  - Anyone can receive instant updates on things happening at the NFTA including: Metro bus route changes, special events, news, public meetings, job postings, and even airport parking. Updates are delivered by email or text messages, or both
- NFTA Public Meetings, Workshops, Information Meetings, and Public Hearings
  - Examples include: Advisory Committee on the Disabled; public hearing before service and fare changes; workshops and information meetings held prior to formal public hearings.
- Rider Alerts, Newspaper Advertisements, News Releases
  - To solicit participation, these mediums are used to advertise changes in fares and service, as well as the meetings and hearings associated with such changes. These mediums are also used to advertise and dissemination information from and about the NFTA that is strictly informational only and does not require public input.

### Citizens Advisory Committee

In a proactive effort to go above and beyond public participation required by law, The Citizens Advisory Committee was established to support and encourage broad-based public participation in the development and review of programs and projects carried out by NFTA Metro. The CAC provides opportunities for proactive, early, and continuing public participation for NFTA projects, programs and

decision making. The purpose of the CAC is to make recommendations and provide input to NFTA Metro Management Staff on community transit issues, including comments on the regularly scheduled service changes. To review, monitor and recommend service and program improvements, and to strengthen relations with the transit communities through the development and implementation of public relations campaigns, programs and events.

#### CAC Mission Statement

The mission of the NFTA Metro Citizens Advisory Committee (CAC) is to serve the Niagara Frontier Transportation Authority Board of Commissioners, NFTA Metro management/staff, users and general public in a proactive role in the development, promotion and provision of high-quality transportation programs and services.

#### CAC Focus Areas:

- Ease of Use – Identify and evaluate programs to make NFTA Metro easy to use for all riders, including participating in implementation of transit projects at the planning stage.
- Safety and Security – Review service to ensuring that NFTA is a safe and secure system.
- Advocacy and Partnerships - Advocate and identify partnering opportunities with organizations to increase transit funding and promote public transit use.
- Enhancements – Identify service and product enhancements to improve user experience and customer satisfaction

#### Guiding Principles:

- Value active citizen's involvement as essential to the future of the NFTA Metro.
- Respect and consider all citizen input.
- Encourage opportunities that reflect the rich diversity of the region.
- Promote participation, based on citizen involvement opportunities, of individuals and community, business and special interest groups.
- Provide public transportation services and products that reflect the needs of the regions diverse and unique communities

#### CAC Membership:

The Citizens Advisory Committee shall serve in an advisory capacity to the NFTA Metro Staff with bi-monthly reports to the NFTA Board of Commissioners. It is understood that any recommendations of the CAC are strictly advisory. The CAC will function under the direction of the NFTA Metro Director of Public Transit.

The CAC shall be composed of not more than twenty-five (25) volunteer members. Members of the CAC shall serve without compensation. It is in the best interest of NFTA that the membership of the CAC reflects a diverse and wide representation and be current users of the NFTA Metro Bus and Rail System. In that regard, the membership may include, but shall not be limited to NFTA Metro users representing the following interests, groups, or areas:

- Transit service users (regular & disabled)
- Ethnic, Community and Faith based Organizations
- Medical & Mental Health Community
- Business/Economic Development Organizations
- School Districts & Educational Community/Parent Organizations
- Recreational/Bicycling/Pedestrian Advocate
- NFTA management and Metro Operator(s)

**Current CAC Membership:** *(Representatives from the following entities)*

- Service Area Transit users – *Selected through an application process and include representatives from Erie & Niagara Counties (Urban, Rural, Suburban & Small City).*
- Voice Buffalo
- Buffalo Urban League
- Community Action of Erie County
- Buffalo Niagara Medical Campus
- Citizens for Regional Transit
- GO Bike Buffalo
- Buffalo Public Schools
- WNY Independent Living Center
- Hispanics United of Buffalo
- Journey's End Refugee Services
- Buffalo Niagara Partnership
- Erie County Senior Services
- Buffalo State College
- Niagara Falls Housing Authority
- BIREC
- Partnership for the Public Good
- SEIU 1199
- NOAH
- Opportunities Unlimited of Niagara

## Monitoring and Evaluation

NFTA continuously monitors, evaluates and improves its public participation process. The NFTA continuously expands and improves upon its public participation process. Regular review is complete through the methods below:

- Tracks website usage and activity including how users arrive at the NFTA website and which pages are most visited along with other statistics.
- Number of individuals on NFTA contact list that receive newsletters, meeting notices and agendas, and other related materials.
- NFTA strongly encourages people to provide comments and suggestions to the NFTA through various channels.

Discussions with advisory groups. NFTA is actively involved in advisory group's activities and receives input from these groups on a variety of transportation and planning issues.

Attachment A

**THE SOLICITING OF PUBLIC COMMENT AND CONDUCTING  
A TITLE VI SERVICE AND FARE EQUITY ANALYSIS  
ON TRANSIT SERVICE AND FARE CHANGES**

**Adopted by the Board of Commissioners March 26, 2012  
Reaffirmed by the Board of Commissioners April 24, 2014**

NFTA policy is to disseminate information and to solicit and respond to public comment on bus/rail service and fare changes to the extent reasonable and practical. Specific elements of this policy are as follows:

1. Except when impossible because of an emergency condition, advance notice of not less than one week will be given to the affected public of minor route and schedule changes. Methods of providing such notice include but are not limited to distribution of revised timetables, handouts, posted notices and/or media releases. In addition, one month's advance notice of any permanent route change will be provided to the chief elected official of any affected local government entity, if possible.
2. Major Service changes or any change in the fare structure will be submitted to the NFTA Board prior to any public discussion or implementation. A major service change for big bus or rail service is defined as a change or changes in any route other than a school tripper route 1) that increases or decreases the number of daily bus or rail car trips on any route by 25% or more, 2) changes the permanent length of a route by 25% or more, or 3) is otherwise considered by staff as having significant impact on our riders. A major service change for MetroLink service is defined as a change or changes 1) that impact 5% or more of Metro's overall fixed route bus and rail annual service hours, or 2) is otherwise considered by staff as having significant impact on our riders.
3. If a major service change involves a reduction in service, or a change in fares is proposed, the NFTA Board will be requested to authorize a formal solicitation of public comment. A notice of the proposed change(s) will be published in a newspaper of general circulation and also, if applicable, in newspapers oriented to the specific groups or communities affected and in buses and rail cars. Such published notices will include information as to the date, time and location of any public hearings. Not sooner than thirty days after the notices are published and posted at least one public hearing shall be held. Special promotional fares are not included in the requirements of this section.
4. Staff will conduct a Service and Fare Equity Analysis required by FTA for compliance with Title VI of the Civil Rights Act of 1964 to assess the effects of a proposed fare or major service change on minority and low-income populations during the planning of such changes. The Service and Fare Equity Analysis will also apply the Disparate Impact threshold and the Disproportionate Burden threshold to the major service changes or changes in fares as follows:

- A. Title VI Disparate Impact Policy – A twenty percent (20%) threshold above which an impact will be deemed “a statistically significant disparity.” If the percentage difference between the minority population affected by the service or fare change more than twenty percent (20%) above the minority population of the overall service area, a disparate impact exists.
- B. Environmental Justice Disproportionate Burden Policy – A twenty percent (20%) threshold above which an impact will be deemed “a statistically significant disparity.” If the percent difference between low-income population affected by the service or fare change is more than twenty percent (20%) above the low-income population of the overall service area, a disproportionate burden exists.

The Analysis will also address alternatives available for people affected by the changes. The results of the Analysis will be reported to the NFTA Board prior to any public discussion or implementation of the proposed changes.

- 5. Staff will consult with private operators as required by NFTA policy on new and restructured service. Such consultation will occur after the proposal is submitted to the NFTA Board but prior to securing final Board approval. A report of the results of the consultation shall be given to the NFTA Board.
- 6. A report of all public comments received and the responses given, as well as the results of the consultation with private operators will be given to the Board. Recommended changes in the proposal as a result of public comment or the consultation with private operators may also be presented.
- 7. Following completion of the process described in paragraphs 2 through 6 above, the NFTA Board may authorize staff to implement the changes or may direct other action. Final public notice of major changes in service or any changes in the fare structure will be given by the methods stated in paragraph 1 above, at least ten days in advance of the effective date of the change.
- 8. Appropriate Erie County officials will be notified of any change that either eliminates a bus route or reduces service on a route by more than 10%, as required by the agreement between NFTA and Erie County.

## Chapter 5: Meaningful Access to LEP Persons

**Requirement:** *Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP).*

**Response:** The NFTA has established a committee to identify and address the needs of LEP persons in its service area. Any identified LEP deficiencies will be addressed by the committee immediately. A Limited English Proficient (LEP) Plan has been created and is attached.



## Title VI

Limited English Proficiency Plan

Christine Farrow, Ph.D., Manager

Vivian Rodgers, ADA/EEO Administrator

EEO/Diversity Development

(716) 855-7286

NFTA Limited English Proficiency Plan

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- IV. Implementation Plan
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**I. Goal**

Niagara Frontier Transportation Authority shall provide quality language assistance services to individuals with limited English proficiency, in a timely manner, to ensure meaningful access to programs, services and activities.

**II. LEP**

FTA's Office of Civil Rights defines LEP populations as: "Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English can be limited English proficient; or Households where no one over age 14 speaks English well are linguistically isolated."

**III. Four-Factor Analysis**

**Factor 1**

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

NFTA serves Erie and Niagara Counties, utilizing buses, light rail, paratransit vans and trolley-buses. We provide bus service to Buffalo, Lockport, Niagara Falls, and all points in between. See Appendix B.

The majority of LEP persons live on the west side of Buffalo with the largest concentration speaking Spanish. The following routes service this area:

3 Grant	23 Filmore -Hertel
5 Niagara- Kenmore	26 Delavan
7 Baynes- Richmond	29 Wohlrs
12 Utica	35 Sheridan
20 Elmwood	40 Buffalo/Niagara Falls
22 Porter-Best	

NFTA's relevant benefits, services, and information provided by our agency have been used by LEP persons regularly. LEP persons may have contact with our bus operators, receptionists, and customer service representatives. LEP persons have access to our website which includes a language translation function. Employees engaged in community outreach have also had ongoing contact with LEP persons.

NFTA has not identified any underserved recipients due to language barriers.

The U.S. Census data below provides information for Erie and Niagara Counties' total population who speak English less than very well. (Appendix A)

### 2012-2016 American Community Survey

	Erie County Total Population	Speak English Less than Very Well	Total % Speak English less than very well	Niagara County Total Population	Speak English Less than Very Well	Total % Speak English less than very well
Total	872,513			202,321		
Spanish or Spanish Creole	29,118	8,596	.99	2,460	784	.38
French	3,017	783	.08	463	57	.02
Portuguese or Portuguese Creole	281	74	.01	0	0	0
German	2,086	55	.01	514	61	.03
Japanese	920	192	.02	27	20	.01
Other and unspecified languages	328	95	.01	12	0	0
LEP		9,795			922	

#### Analyze the data collected

- **Erie County:**

Review of the 2012-2016 American Community Survey of the U.S. Census Report indicates Erie County's largest LEP population is Spanish speaking with approximately .99 % of the people speaking English less than "very well."

People in the grouping of "speak other languages less than very well," consists of .13%. This group is a combined grouping of all languages other than English.

The total estimate of people living in Erie County is 872,513. Of this group, 784,115 speak only English; speak Spanish (8,596 speak English less than "very well"); 6,632 speak other languages (1,199 speak English less than "very well").

- The Buffalo School District reports the number of English Language Learner (ELL) students in the Buffalo schools has increased from 5,077 for the 2015-2016 school year to 6,295 for the 2017-218 school year. During the same time periods the number of Languages spoken increased from 78 to 83.

- **Niagara County:**

Review of the 2012-2016 American Community Survey of the U.S. Census Report indicates Niagara County's largest LEP population is Spanish speaking with approximately .38% of the people speaking English less than "very well".

People in the grouping of "speak other languages less than very well," consists of .06%. This group is a combined grouping of all languages other than English.

The total estimate of people living in Niagara County is 202,321. Of this group, 194,091 speak only English; 2,460 speak Spanish (784 speak English less than "very well"); 1,016 speak other languages (922 speak English less than "very well").

- **Reach out to community organizations that serve LEP persons**

NFTA has current associations with communities serving LEP persons through outreach efforts.

The following organizations assist LEP persons:

- Adult Education Division of the Buffalo Public Schools
- Journey's End Refugee Services, Inc.
- Response to Love Center
- Hispanic United of Buffalo
- B.I.R.E.C. (Buffalo Immigrant Refugee Empowerment Coalition)
- P.A.T.H. (People Against Trafficking Humans, Inc.)
- International Institute of Buffalo

NFTA has implemented a survey as part of our outreach efforts to identify any deficiencies/language barriers of our transportation system. (See Appendix D)

### **Factor 2**

**The frequency with which LEP individuals come into contact with NFTA programs, activities and services**

LEP persons may come in contact with NFTA representatives from the following areas or activities

- Bus, light rail
- ADA Paratransit
- Customer Care Center
- Public Meetings
- On Board (Ridership Surveys)
- NFTA website language translator

The most frequently traveled destination in NFTA's service area is the downtown Buffalo area using the following routes:

16 South Park	20 Elmwood
3 Grant	40 Buffalo/Niagara Falls
5 Niagara-Kenmore	24 Genesee
14 Abbott	15 Seneca
6 Sycamore	

### **Community Outreach**

Hispanics United of Buffalo is a Human Service Agency that serves more than 500 individuals on a monthly basis. It is a one stop shop, serving the geographic area of Erie County, providing drug and alcohol counseling, a food pantry, interpreter and a methadone clinic. According to Hispanics United the majority of the population is Spanish speaking LEP persons that have emigrated from Puerto Rico with the population increasing over the past five years. The education level ranges from an average of 8<sup>th</sup> grade through 11<sup>th</sup> grade.

### **Factor 3**

#### **The nature and importance of the program, activity, or services provided by NFTA to the LEP population**

The provision of public transportation is a vital service, especially for people without access to personal vehicles. Based on the most recent on-board survey, of the 282 rail and bus riders surveyed that spoke English "less than very well" or "not at all", 164 or 58% do not have access to a vehicle. In addition, 172 of these LEP riders or 61% do not have a driver's license.

### **Factor 4**

#### **The resources available to the recipient for LEP outreach, as well as the cost associated with that outreach.**

Our website contains a language translator. Bilingual employees are also available for translation services. The NFTA also offers a service called Language Line for translation. All schedules are printed in Spanish. "I Speak" cards are available at points of contact with the public. In the event of an emergency, universal symbols are used in the buses and throughout the agency.

Spanish/English Ticket Vending Machines and Language Line Service (See Appendix E). The average three-year cost of the Language Line Service is approximately \$1,066.84.

#### **Determine what, if any, additional services are needed to provide meaningful access.**

Based on current analysis no additional services have been identified as needed to provide meaningful access. Through our continued monitoring efforts and feedback from customers, it will be determined whether additional services are needed in the future.

**Analyze your budget.**

Estimations of the cost needed and amount available for LEP services are currently being analyzed for any upcoming adjustments that may be needed.

**Consider cost effective practices for providing language services.**

NFTA through community outreach has assistance for many language services that may be needed. Contracting with Language Line is ongoing. Bilingual staff is also available when needed.

**Summary**

The four-factor analysis has identified that Spanish speaking individuals are the LEP group of Erie and Niagara County. They are above the safe-harbor threshold of 1,000 persons, however, the total LEP population is less than the five percent (5%) safe-harbor threshold.

“The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient’s written translation obligations”.

**IV. Implementation Plan**

The Department of Transportation (DOT)'s LEP Guidance recommends that grant recipients develop an implementation plan that includes the following five elements:

- A) Identifying LEP individuals; needs based language assistance using the four-factor analysis
- B) Provide language assistance measures
- C) Train staff
- D) Provide notice to LEP persons
- E) Monitor and update LEP outreach plan

**A. LEP Needs Assessment**

- The LEP population for Erie County as a whole group is approximately 21,681. This group is a combined grouping of all languages in Erie County other than English; the Spanish language being the largest.
- The largest group of the LEP population for Niagara County as a whole group is approximately 1,878. This group is a combined grouping of all languages in Niagara County other than English.
- Fixed routes 3, 5, 7,12, 20, 22, 23, 29 35, and 40 are the routes mainly used by Spanish-speaking LEP population.

**B. Language Assistance**

- NFTA has posted notices informing LEP persons of their rights as well as available services and any changes to those services. This is in addition to our current Title VI notice to beneficiaries.
- NFTA currently uses Language Line Services for live interpretation of many languages. Translating key documents from English to Spanish and other languages as a request arises. The following resources will be used to provide language assistance:

Resource	Phone Number	Form of Assistance
Language Line Services	1-800-523-1786	Interpreter
International Institute of Buffalo		
	716-883-1900	Written Translation
Use <a href="mailto:iib@iibuff.org">iib@iibuff.org</a> to submit information to be translated.		
Journey's End Refugee Services		
	Phone Number	Form of Assistance
	716-882-4963	Written Translation
	Fax Number	
	716-882-4977	

- Each department has the proper procedures and access codes for accessing the appropriate language assistance; contact information and Language Line Guide.
  - Each bus has a Language Identification card (Appendix E) in the event of a communication barrier. The operator will then call control for an interpreter after first identifying the appropriate language using the Language Identification card.
- All bus and rail schedules are in English and Spanish.
  - Communicating with groups through NFTA's outreach program that provides assistance to the LEP population regarding our transit service.
- C. Train Staff
- NFTA has trained all employees who are in public contact positions. Members of management have also been made fully aware and understand our LEP plan. Training first occurs during new hire orientation as new employees are taught our LEP policies and procedures. Refresher training is also provided on a need by need basis.
- D. Provide Notice to LEP Persons
- NFTA currently uses universal symbols throughout the system;
  - Posts signs in transportation centers and on buses called Rider Alerts in English and Spanish;
  - Sends information to local organizations working with LEP persons;
  - Posts notices on our website using the built-in resource of Google translator.

E. Monitor and Update LEP Plan

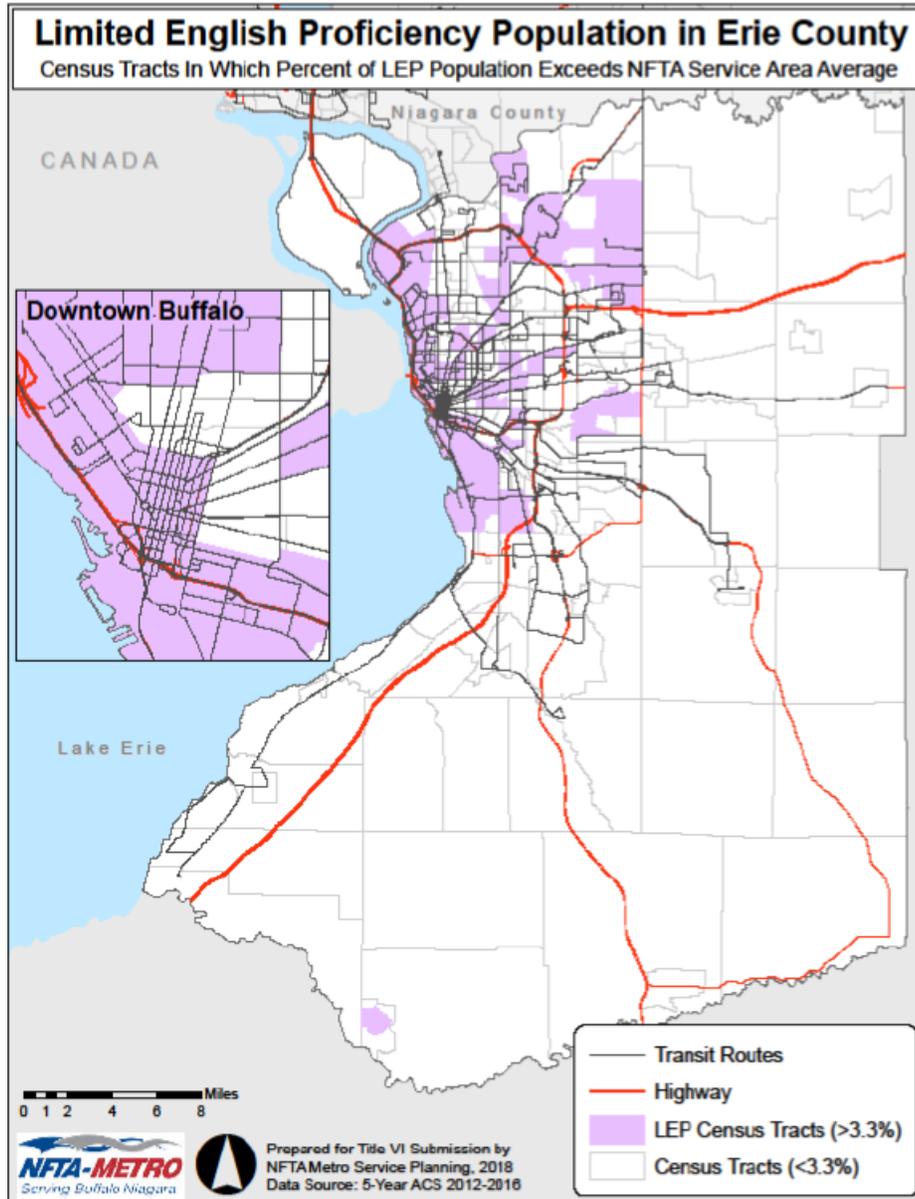
- NFTA currently accesses and will continue assessing the LEP persons served as well as the number of requests for language assistance as well as complaints on our bus, light rail, at our airports and transportation centers. Surveys will continue to be conducted as well.
- Ongoing assessment of staff and operator training through monitoring and communication with appropriate departments will drive training using best practices.

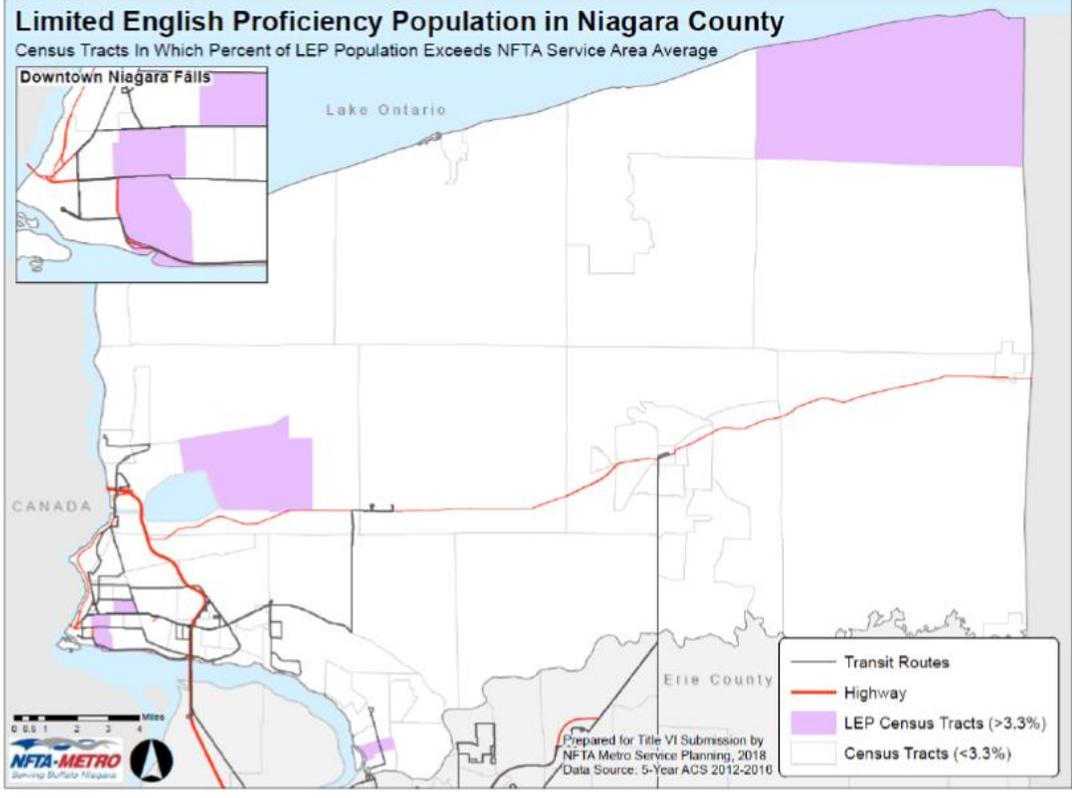
## Appendix A

2012-2016 American Community Survey 5-Year Estimates

	Erie County, New York		Niagara County, New York	
	Estimate	Margin of Error	Estimate	Margin of Error
Total:	872,513	+/-32	202,321	+/-5
Speak only English	784,115	+/-1,821	194,091	+/-602
Speak Spanish:	29,118	+/-976	2,460	+/-319
Speak English "very well"	20,522	+/-1,111	1,676	+/-270
Speak English less than "very well"	8,596	+/-683	784	+/-219
Speak other languages:	59,280	+/-1,670	5,770	+/-504
Speak English "very well"	37,599	+/-1,445	3,892	+/-416
Speak English less than "very well"	21,681	+/-1,292	1,878	+/-269
Born in state of residence:	700,743	+/-2,930	170,037	+/-1,109
Speak only English	671,689	+/-2,902	166,597	+/-1,076
Speak Spanish:	12,869	+/-1,066	1,331	+/-239
Speak English "very well"	11,644	+/-1,086	1,076	+/-220
Speak English less than "very well"	1,225	+/-237	255	+/-117
Speak other languages:	16,185	+/-975	2,109	+/-251
Speak English "very well"	14,112	+/-863	1,878	+/-240
Speak English less than "very well"	2,073	+/-352	231	+/-74
Born in other state in the United States:	96,690	+/-2,503	22,610	+/-1,030
Speak only English	91,727	+/-2,283	21,841	+/-1,017
Speak Spanish:	2,490	+/-328	359	+/-134
Speak English "very well"	2,093	+/-324	248	+/-97
Speak English less than "very well"	397	+/-148	111	+/-87
Speak other languages:	2,473	+/-402	410	+/-135
Speak English "very well"	2,275	+/-391	330	+/-108
Speak English less than "very well"	198	+/-86	80	+/-50
Native; born outside the United States:	14,351	+/-867	1,321	+/-244
Speak only English	3,643	+/-412	893	+/-186
Speak Spanish:	9,821	+/-733	295	+/-115
Speak English "very well"	4,643	+/-515	149	+/-65
Speak English less than "very well"	5,178	+/-505	146	+/-93
Speak other languages:	887	+/-239	133	+/-80
Speak English "very well"	627	+/-189	65	+/-48
Speak English less than "very well"	260	+/-108	68	+/-62
Foreign born:	60,729	+/-1,747	8,353	+/-637
Speak only English	17,056	+/-954	4,760	+/-486
Speak Spanish:	3,938	+/-562	475	+/-161
Speak English "very well"	2,142	+/-361	203	+/-88
Speak English less than "very well"	1,796	+/-340	272	+/-128
Speak other languages:	39,735	+/-1,487	3,118	+/-366
Speak English "very well"	20,585	+/-1,191	1,619	+/-289
Speak English less than "very well"	19,150	+/-1,222	1,499	+/-237

Appendix B - LEP MAP





**Appendix C – Survey**

**NIAGARA FRONTIER TRANSPORTATION AUTHORITY  
COMMUNITY ORGANIZATIONS SERVING LEP PERSONS**

1. What geographic area does your agency serve?
2. How many people does your agency provide services to?
3. Has the size of the population you serve increased, stayed the same, or decreased over the past five years?
4. What are the countries of origin from which your population has immigrated?
5. Does your population come from an urban or rural background?
6. What are the languages spoken by the population you serve?
7. What is the age and gender of your population?
8. What is the education and literacy level of the population you serve?
9. What needs or expectations for public services has this population expressed?
10. Has the population inquired about how to access public transportation or expressed a need for public transportation service?
11. What are the most frequently traveled destinations?
12. Are there locations that the population has expressed difficulty accessing via the public transportation system?
13. Do the transit needs and travel patterns of the population vary depending on the age or gender of the population members?
14. What is the best way to obtain input from the population?
15. Who would the population trust most in delivering language appropriate messages?

## Appendix D

### Language Line Services

The NFTA has contracted with Language Line Services to offer our limited English-speaking customers (LEP) the opportunity of having an interpreter. Professionally trained and tested interpreters will translate conversations meaning-for-meaning.

All you need to do is follow the instructions below:

- Dial 1-800-523-1786
- Use Client ID #602011
- Tell the operator the language you need interpreted
- Use Access Code #2090

This company offers translations in 150 languages including, but not limited to:

Spanish, Chinese, Karen, Somali, Arabic, Burmese, French, Japanese, Korean, Russian, Vietnamese, Armenian, Cambodian, German, Italian, Polish, Farsi, Tagalog, Thai, and Urdu.

The operator will set up a conference call and translate while you are on the line.

Tiers	Languages	Daytime (5am-5pm)	Nights/Weekends
Tier 1	Spanish	\$2.45/min.	\$2.75/min.
Tier 2	Mandarin, Cantonese, French, Japanese, Korean, Russian, Vietnamese and Japanese	\$2.75/min.	\$3.45/min.
Tier 3	Armenian, Cambodian, Haitian, Creole, German, Italian, Polish, Portuguese	\$2.85/min.	\$4.15/min.
Tier 4	All other languages offered	\$2.95/min.	\$4.85/min.

The above charges will be applied against the \$50.00 monthly usage fee. There is a \$6 dial out charge if the operator is asked to call a third party.

Peak Hours are Monday - Friday 5am to 5PM PST.

Off Peak Hours are Holidays and Weekends.

The two other charges have remained the same:

-a \$50 minimum charge per month

- \$6 dial out charge if the operator is asked to call a third party

There is also a \$4.50/month charge for equipment, which is a dual handset phone located at the BNIA Customer Care desk.



## Appendix F

### Buffalo Public Schools Top twenty (20) Languages spoken by ELL (English Language Learners)

#### TOP 20 LANGUAGES OTHER THAN ENGLISH SPOKEN BY ELL STUDENTS IN BUFFALO PUBLIC SCHOOLS 3 Year EOY Comparison

# ELLS: 6,295			
2017-2018 (May 2018) (EOY)			
Rank	Language	#	%
1	Spanish	2,327	37.0%
2	Arabic	671	10.7%
3	Karen	514	8.2%
4	Somali	478	7.6%
5	Burmese	444	7.1%
6	Swahili	308	4.9%
7	Bengali	251	4.0%
8	Nepali	225	3.6%
9	Kinyarwanda	138	2.2%
10	Mai Mai	121	1.9%
11	Tigrinya	95	1.5%
12	Karenni	93	1.5%
13	French	78	1.2%
14	Kiziguwa	53	0.8%
15	Chin	34	0.5%
16	Dari	34	0.5%
17	Kirundi	30	0.5%
18	Rohingya	27	0.4%
19	Vietnamese	27	0.4%
20	Malay	25	0.4%
<b>TOTAL LANGUAGES:</b>		<b>83</b>	<b>94.9%</b>

SOURCE: OSA (AA)/IC ad hoc 05/2018 ELL-FLEP list

# ELLS: 5,740			
2016-2017 (May 2017) (EOY)			
Rank	Language	#	%
1	Spanish	1,854	32.3%
2	Arabic	690	12.0%
3	Karen	541	9.4%
4	Somali	491	8.6%
5	Burmese	438	7.6%
6	Swahili	292	5.1%
7	Nepali	252	4.4%
8	Bengali	204	3.6%
9	Kinyarwanda	106	1.8%
10	Mai Mai	106	1.8%
11	Karenni	104	1.8%
12	French	81	1.4%
13	Tigrinya	76	1.3%
14	Kiziguwa	46	0.8%
15	Chin	43	0.7%
16	Vietnamese	31	0.5%
17	Dari	25	0.4%
18	Kirundi	22	0.4%
19	Malay	22	0.4%
20	Rohingya	21	0.4%
<b>TOTAL LANGUAGES:</b>		<b>84</b>	<b>94.9%</b>

SOURCE: OSA (AA) 05/05/2017 ELL-FLEP list

# ELLS: 5,077			
2015-2016 (May 2016) (EOY)			
Rank	Language	#	%
1	Spanish	1,743	34.3%
2	Karen	559	11.0%
3	Arabic	487	9.6%
4	Somali	432	8.5%
5	Burmese	386	7.6%
6	Nepali	288	5.7%
7	Bengali	167	3.3%
8	Swahili	130	2.6%
9	Karenni	108	2.1%
10	Mai Mai	92	1.8%
11	French	80	1.6%
12	Kinyarwanda	78	1.5%
13	Tigrinya	74	1.5%
14	Chin	50	1.0%
15	Kiziguwa	42	0.8%
16	Vietnamese	30	0.6%
17	Kurukh	24	0.5%
18	Kiswahili	20	0.4%
19	Turkish	19	0.4%
20	Farsi	17	0.3%
<b>TOTAL LANGUAGES:</b>		<b>78</b>	<b>95.1%</b>

SOURCE: OSA (AA) 05/05/2016 ELL-FLEP list

Appendix G

**Data Focus: Languages Spoken in the Buffalo Public Schools**

	<b>Number of Students</b>	<b>Number of Languages Spoken</b>
2015 – 2016	5,077	78
2016 – 2017	5,740	84
As of May, 2018	6,295	83

Source: OSA (AA)/IC ad hoc ELL-FLEP List (data pulled in May of the school year)

<b>Rank</b>	<b>Language</b>	<b>Number of Students</b>
1	Spanish	2,327
2	Arabic	671
3	Karen	514
4	Somali	478
5	Burmese	444
6	Swahili	308
7	Bengali	251
8	Nepali	225
9	Kinyarwanda	138
10	Mai Mai	121

Source: OSA (AA)/IC ad hoc ELL-FLEP List (data pulled in May of the school year)

# Chapter 6: Minority Representation on Planning and Advisory Bodies

**Requirement: 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, non-elected 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.**

**Response:**

## Non-Elected Committees and Councils

The Citizens Advisory Committee (CAC) is a committee established by the NFTA to serve in an advisory capacity to Metro Staff with bi-monthly reports to the NFTA Board of Commissioners. The membership of the CAC is by invitation however, organizations appoint their own members. It is in the best interest of NFTA that the membership of the CAC reflects a diverse representation of current users of the NFTA Metro Bus and Rail System. Membership may include, but shall not be limited to transit users representing the following interests, groups, or areas:

- Transit service users
- Ethnic, Community and Faith based Organizations
- Medical & Mental Health Community
- Business/Economic Development Organizations
- School Districts & Educational Community/Parent Organizations
- Recreational/Bicycling/Pedestrian Advocate
- NFTA management and Metro Operator(s)

The current CAC membership by race is depicted in below the membership is 50% minority as self-reported by members.

Members of the Board of Directors are not selected by the NFTA and therefore their membership is not reported.

*Figure 7- CAC Membership by Race*

Body	Caucasian	Latino	African American	Asian American	Native American	2 or More Races
Population	80.16%	4.61%	12.21%	3.15%	0.57%	2.24%
Citizens Advisory Committee	50.00%	0.00%	50.00%	0.00%	0.00%	0.00%

## Chapter 7: Subrecipient Assistance and Oversight

***Requirement: 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 Title VI requirements, then the primary recipient is also not in compliance.***

### **Response:**

Through NFTA's JARC and New Freedom programs, the NFTA ensures that Title VI requirements are identified in the Project Management Plan (PMP) and outlined specifically in the Memorandum of Understanding (MOU) with each individual subrecipient. NFTA provides each subrecipient with its Title VI plan as well as sample notices and complaint procedures. NFTA provides additional assistance as needed by individual subrecipients. Examples of the PMP and MOU are included in this chapter.

In addition, the subrecipient is required to provide signed documentation to confirm that all requirements of the Title VI are being followed. Subrecipients may adopt NFTA's plan or submit their Title VI Plan within three months of signing their MOU. The plan must include copies of their Notice of Beneficiaries and Complaint Procedures as well as any equity analysis completed due to changes in service or fares when applicable. The reported location of each subrecipient's notice to beneficiaries is submitted in a verification form and is confirmed during site visits. An example of a completed site visit check list is provided.

Subrecipients must also report quarterly on any complaints, however to date no subrecipients have received any Title VI complaints. At the request of FTA, in response to a complaint of discrimination, NFTA shall request that subrecipients who provide transportation service verify that their level and quality of service is provided on an equitable basis. NFTA does not have any subrecipients that provide fixed route transit.

**NIAGARA FRONTIER TRANSPORTATION AUTHORITY (NFTA)**

# **Sub Recipient Program Management Plan**

For:

**Erie County Senior Services**

**SECTION 5317 PROGRAM:  
NEW FREEDOM**

**7/30/2018**



Niagara Frontier Transportation Authority  
*Serving the Niagara Region*

**NIAGARA FRONTIER TRANSPORTATION AUTHORITY  
SERVICE PLANNING DEPARTMENT**

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## INTRODUCTION

This document comprises the Niagara Frontier Transportation Authority's Section 5316 and 5317 Program Management Plan prepared in compliance with the provisions of the Federal Transit Administration's Circulars 9050.1, "The Jobs Access and Reverse Commute (JARC) Program Guidance and Application Instructions" and 9045.1 "New Freedom Program Guidance and Application Instructions".

This submission reflects the latest FTA Guidelines. The staff of the Service Planning Department of NFTA prepared this plan. Questions and comments may be directed to:

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## PROGRAM GOALS AND OBJECTIVES

The goals and objectives of the Western New York JARC and New Freedom's programs are directly related to the adopted Coordinated Public Transit-Human Services Transportation Plan<sup>1</sup>, which includes three key elements: These goals may be expanded as appropriate for the region; and specific performance measures for plan effectiveness will be established.

- ❑ To improve the delivery of transportation services for the target population
- ❑ To generate efficiencies in operation that can lead to increased levels of service
- ❑ To encourage cooperation and coordination with a consistent means of project development and selection for allocation of the identified financial resources

JARC program funds are intended to fund innovative and flexible programs that meet the transportation needs of individuals with limited incomes. As in the past JARC and New Freedom funding cycles, all JARC projects selected for funding were required to address needs and/or gaps that were identified the Locally Developed Coordinated Public Transit-Human Services Transportation Plan. Therefore, JARC funds were directed first to programs best meeting the goals and objectives of the plan and addressing gaps.

The New Freedom formula grant program seeks to reduce barriers to transportation services and expand the transportation mobility options available to people with disabilities beyond the requirements of the ADA of 1990. The vision for the program will improve mobility options for the disabled, aging, and low-income population subgroups living in the region, based on identified needs, gaps and barriers. Those projects that directly address the identified needs, gaps, and barriers in the plan and serve people with disabilities will receive the highest priority for funding. The coordinated plan recommends that the solicitation for this program allow multi-year project proposals using "four-years" of funding (FFY 08/09, 09/10, 10/11 and 11/12) to provide an opportunity for applicants to have an adequate time period to determine project success. The solicitation will encourage projects that request funds for operating assistance over capital projects to stretch the funding (operating expenses require a 50/50 match, whereas capital projects require an 80/20

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<sup>1</sup> Available on-line at <http://www.GBNRTC.org>

match). Given the needs assessment documented in the coordinated plan, projects directed at expanding the Paratransit eligibility service area beyond the existing ¾ mile, individualized travel training programs, and coordinated mobility management programs will be given higher consideration in the evaluation process over projects that do not specifically address the needs that have been documented in the coordinated plan.

The ultimate goal (strategy) of the HSTP was to identify gaps in transportation service based on a demographic and demand assessment profile, and to fill those gaps with appropriate transportation projects solicited through the Sections 5316 and 5317 application process. The plan introduced the mechanism for applying for those funds; the actual application package is currently available and the idea, over time, is to gradually build a coordinated, cohesive regional transportation system that can be used by all transportation-disadvantaged individuals.

The plan itself is flexible; the process and information contained in the plan may change over time as federal guidelines change, and as local entities indicate the needs of an effective human services transportation plan. FTA recognizes that plans will evolve as they mature. The Greater Buffalo Niagara Regional Transportation Council (GBNRTC) is the metropolitan planning organization (MPO). In collaboration with its member agencies and various other agencies working to improve transportation access for their member clients, GBNRTC will continue to investigate methods and strategies for coordination that are within the feasibility of implementation.

## **Human Services Transportation Plan**

The purpose of Human Services Transportation Plan (HSTP) is to improve transportation services for persons with disabilities, older adults, and individuals with lower incomes in the Erie and Niagara Counties region.

The plan provides a framework for the development of projects that will address the transportation needs of the target population, by ensuring that this two-county area and its human service agencies coordinate transportation resources offered through multiple Federal Transit Administration (FTA) programs. These include the Elderly and Individuals with Disabilities (Section 5310); Job Access and Reverse Commute (JARC, Section 5316); and New Freedom (Section 5317) programs.

The Locally Developed Coordinated Public Transit-Human Services Transportation Plan (HSTP) was recently updated and published by GBNRTC in December 2011. The recently updated plan can be found at the web site listed below.

- [2011 Coordinated Human Services Transportation Plan \(7.5 MB\)](#)

## **PROGRAM MANAGEMENT ROLES AND RESPONSIBILITIES**

The Governor of New York State has designated the NFTA as the agency charged with administering the Section 5316 and 5317 Program for the Western New York Region. Within NFTA, the Service Planning and Government Affairs Departments administer several Federal and State programs for mass transit in the area, including Jobs Access Reverse Commute and New Freedom. The Service Planning and Government Affairs Department staffs work directly with both the MPO and with human service agencies. The boundaries of both NFTA and GBNRTC encompass Erie and Niagara Counties and the Buffalo-Niagara urbanized areas, and the planning, project solicitation, and implementation of JARC and New Freedom

projects similarly reflect that geographic basis.

As the designated recipient for the funds, NFTA will act as the “pass-through” agent for those organizations that will receive funding. For 2012, FTA has \$626,039 available locally in JARC funding and \$375,343 available in New Freedom funding.

NFTA works closely with GBNRTC in developing transit plans and programs. As noted above, for JARC and New Freedom, the roles and responsibilities have been divided as follows:

**GBNRTC (MPO):**

- ❑ GBNRTC hosts the Planning & Coordinating Committee (PCC) (See Table 1 for Membership)
- ❑ Adopts the Coordinated Public Transit-Human Services Transportation Plan after public review and comment
- ❑ Conducts the Competitive Solicitation for projects which includes:
  - ❑ notifying eligible local entities of funding availability;
  - ❑ developing project selection criteria;
  - ❑ determining applicant eligibility; including project evaluation and award, and inclusion in the Transportation Improvement Program (TIP)
  - ❑ Certifying that all projects are derived from a locally developed coordinated public transit-human services transportation plan developed through a process that consists of representatives of public, private, and non-profit transportation and human services providers with participation by the public.

**NFTA (Designated Recipient):**

- ❑ Member of the GBNRTC and PCC
- ❑ Is an eligible applicant for both programs
- ❑ Administers projects selected by the GBNRTC through the Federal Transit Administration (FTA) grant management system by forwarding an annual program of projects (POP) and grant application to FTA;
- ❑ Works with sub-recipients chosen through the competitive process to ensure compliance with FTA requirements. Provides oversight and monitoring;
- ❑ Documenting procedures in a Program Management Plan;
- ❑ Certifying that allocations of grants to sub-recipients are distributed on a fair and equitable basis

## **COORDINATION**

The coordinated plan recognizes that there are several agency groups already working to improve over-all transportation services for their clientele (i.e., the HSTP target population) in the region. GBNRTC, in collaboration with NFTA, has long established working relationships with these community groups and transportation providers. These groups, in coordination with the NFTA and GBNRTC, are actively working to implement strategies to achieve an efficient, effective and coordinated transportation system for the targeted population within the Buffalo-Niagara region. The NFTA and GBNRTC will rely on these groups to offer suggestions/options for enhancing coordination efforts and representatives of the JARC/New Freedom Review Team, established from these groups will also assist in selecting and awarding JARC/New Freedom funds. The NFTA and GBNRTC fully support the activities that these committees.

In addition, the NFTA has developed numerous partnerships and cooperative relationships with the Departments of Social Services (DSS) in Erie & Niagara Counties, as well as job developers and employers to identify and address job access transit needs. For several years, NFTA has been responding to the “spatial mismatch” between transit dependent individuals seeking employment and the location of new employment centers and job opportunities by reevaluating the public transit needs of the community and redeploying or expanding service where possible.

Other on-going human service/transportation coordination efforts include:

- ❑ DDAWNY (Developmental Disabilities Alliance of Western New York) has an established transportation committee of human service agencies and representatives from private and public transportation providers. This committee is continually working to maximize existing transportation resources for its clientele.
- ❑ The Center for Transportation Excellence (CTE) is a privately funded initiative and physical facility that has been created to establish a standard of best practices for organizations in the health and human services transportation industry through the provision of comprehensive training, state of the art fleet maintenance, mobility management and advocacy for integrated human-centered transportation systems. Representatives of the NFTA serve on CTE’s Board of Advisors and sub-committees.
- ❑ In Niagara County several organizations and agencies, including the Niagara County Department of Social Services, Niagara County Office for Aging, NFTA, HANCI, Council On Aging and the Dale Center have been meeting periodically to discuss transportation issues and explore opportunities for collaboration in providing improved service. Also, the Coalition of Agencies in Service to the Elderly has compiled and periodically updates a Niagara County Transportation Guide that provides information and contacts for Niagara County service providers. In addition, NFTA coordinates with Rural Niagara Transportation to maintain continuity of services between the two agencies.

The GBNRTC released a proposed HSTP process at the Human-Centered Transportation Summit that took place on September 21st, 2006. This summit, hosted by the Center for Transportation Excellence and Erie County Senior Services and sponsored by numerous local human service agencies, looked at ways to address current and future transportation needs for persons who are transportation disadvantaged. Attendees included a range of transportation and human service professionals as well as transportation consumers, the audience that GBNRTC is including in the HSTP development. Attendees were being given the opportunity to comment on the HSTP and the final plan with comments were posted on GBNRTC’s website ([www.gbnrtc.org](http://www.gbnrtc.org)), with notices about the plan also sent to the GBNRTC/CTE mail-list (and others). The final HSTP was adopted in January 2007 and mailed to interested parties. The formal working group entirely devoted to the HSTP project selection process was established for JARC and for New Freedom activities. Coordination efforts with the previously mentioned human service/transportation committees will continue.

In an effort to update the plan, the GBNRTC used surveys, research, and public outreach as well as input by the Human Services Transportation Plan Review Team to modify and prepare the 2011 plan. The revised plan was adopted in December 2011.

Following is a list of Human Service/Transportation Agencies involved in the ongoing coordination process:

- ❑ Erie County Department of Senior Services
- ❑ Erie County Department of Social Services

- ❑ Niagara County Department of Social Services
- ❑ Greater Buffalo Niagara Regional Transportation Council
- ❑ Niagara Frontier Transportation Authority
- ❑ Center for Transportation Excellence
- ❑ Home HealthCare Aids Consortium
- ❑ Independent Living Center of Western New York
- ❑ Niagara County Office for Aging
- ❑ Developmental Disabilities Alliance of Western New York
- ❑ NYS Department of Labor
- ❑ NYS Department of Transportation
- ❑ Erie and Niagara Counties Job Developers Consortium

## **ELIGIBLE SUB-RECIPIENTS**

Both JARC and New Freedom are formula grant programs. Applicants may include state or local government agencies, tribal governments, social services agencies, private and public transit operators, and non-profit organizations. The Niagara Frontier Transportation Authority (NFTA) is the designated recipient for JARC and New Freedom in the Western New York region, and is an eligible applicant for these funds. Applicants other than the “designated recipient” for JARC must enter to an agreement with the designated recipient for funds and must follow all federal reporting and administrative guidelines (see FTA Circular C9050.1).

- ❑ Designated Recipient: In large urbanized areas over 200,000 in population, an entity designated, in accordance with the planning process under 49 U.S.C. 5303, 5304, and 5306, by the chief executive officer of a State, responsible local officials, and publicly owned operators of public transportation, to receive and apportion amounts under the JARC program that is attributable to a transportation management area.
- ❑ Sub-recipient: Refers to a State or local governmental authority, non-profit organization, or operator of public transportation services that receives a grant under JARC indirectly through a recipient.

These eligibility requirements are exactly the same as those laid out by the FTA. Eligible projects and use of program funds similarly re-state the eligibilities promulgated by federal law without modification. Priority in funding within allowable eligibilities is determined from the locally developed coordination plan.

Project Solicitation materials include the following statement: *“Disadvantaged, minority and women-owned business enterprises will be afforded full opportunity to submit proposals and there will be no discrimination on the basis of race, creed, color, sex, national origin, disability or marital status in the award of the contract or any subcontract.”*

Every application for JARC and New Freedom funding must be consistent with the Locally Developed, Human Services-Public Transportation Coordinated Plan in order to be eligible for funding.

## **LOCAL SHARE AND LOCAL FUNDING REQUIREMENTS**

JARC funds can be used to support up to 80 percent (80/20 match) capital projects, and not more than 50 percent (50/50 match) of projects for operating assistance. Fare revenue generated on the service to be supported may not be used as matching funds for operating grants. Non-DOT Federal funds and local and private funds can be used as a match. Matching share requirements are flexible to encourage coordination with other federal programs that may provide transportation, such as Health and Human Services or Medicaid.

NFTA’s source of local share is its general operating budget.

New Freedom funds may be used to finance capital, planning and operating expenses. The Federal share of eligible capital and planning costs may not exceed 80 percent of the net cost of the activity. The Federal share of the eligible operating costs may not exceed 50 percent of the net operating costs of the activity.

The local share of eligible capital costs shall be no less than 20 percent of the net cost of the activity, and the local share for eligible operating costs shall be no less than 50 percent of the net operating costs. All of

the local share must be provided from sources other than Federal DOT funds. Some examples of sources of local match which may be used for any or all of the local share include: state or local appropriations; other non-DOT Federal funds; dedicated tax revenues; private donations; revenue from human service contracts; toll revenue credits; and net income generated from advertising and concessions. Non-cash share such as donations, volunteer services, or in-kind contributions is eligible to be counted toward the local match as long as the value of each is documented and supported, represents a cost which would otherwise be eligible under the program, and is included in the net project costs in the project budget.

Income from contracts to provide human service transportation may be used either to reduce the net project cost (treated as revenue) or to provide local match for New Freedom operating assistance. In either case, the cost of providing the contract service is included in the total project cost.

**a. Exceptions.** The Federal share is 90 percent for vehicle-related equipment and facilities required by the Clean Air Act (CAA) or the Americans with Disabilities Act (ADA). It is only the incremental cost of the equipment or facility required by the CAA or ADA that may be funded at 90 percent, not the entire cost of the vehicle or facility, even if the vehicle or facility is purchased for use in service required by the ADA or CAA. Designated recipient wishing to apply for assistance at the higher match ratio should consult the FTA regional office for further guidance regarding methods of computing the incremental cost before submitting an application. .

**b. Use of Other Federal Funds.** Local match may be derived from other Federal programs that are eligible to be expended for transportation, other than funds from DOT programs. Examples of types of programs that are potential sources of local match include: employment, training, aging, medical, community services, and rehabilitation services. To be eligible for local match for FTA funds, the other Federal funds must be used for activities included in the total net project costs of the FTA grant. Expenditure of other Federal funds for transportation outside of the scope of the project cannot be applied as a credit for local match in the FTA grant. Specific program information for other types of Federal funding is available at [www.unitedweride.gov](http://www.unitedweride.gov).

A sub-recipient organization's ability to identify the source of the 20% match and the funds to properly operate and maintain any capital project proposals vehicle is part of the grant application process. NFTA will further question any applicant that does not appear to have the proper financial ability to manage a grant.

## **PROJECT SELECTION CRITERIA AND METHOD OF DISTRIBUTING FUNDS**

Every project to be approved for JARC and New Freedom funding must be derived from the GBNRTC Human Services Transportation Plan.

Projects for both programs are awarded through a competitive selection process conducted by the GBNRTC. A review committee comprised of staff from GBNRTC and the selection committee reviews, scores and ranks the project applications. The list of projects approved is then submitted to GBNRTC's Planning and Policy Committee for approval and inclusion in the TIP. NFTA then submits grant applications to the FTA for funding via TEAM. Where sub-recipients are involved (New Freedom or JARC) an agreement must be entered with the NFTA for funds and must follow all federal reporting and administrative guidelines (see FTA Circular C 9045.1, "New Freedom Program guidance and application instructions"). This agreement must be in place prior to grant execution and the commencement of project work.

Each project application is scored using the following criteria.

## SCORING CRITERIA FOR JARC

The following information and scoring criteria will be used to score and rate project applications for JARC and New Freedom funding.

**1. Project Needs/Goals and Objectives (25 points):** The project should directly address transportation gaps and/or barriers identified through the locally developed Human Services Transportation Plan (HSTP) or are otherwise based on a documented assessment of needs within the designated communities of concern. Project application should clearly state the overall program goals and objectives, and demonstrate how the project is consistent with the objectives of the JARC and New Freedom grant programs.

**2. Implementation Plan (25 points):** For projects seeking funds to support program operations, applicants must provide a well-defined service operations plan, and describe implementation steps and timelines for carrying out the plan. The project application should indicate the number of persons expected to be served, and the number of trips (or other units of service) expected to be provided. The service operations plan should identify key personnel assigned to this project and their qualifications. Project sponsors should demonstrate their institutional capability to carry out the service delivery aspect of the project as described. For projects seeking funds for capital purposes, the applicant must provide a solid rationale for use of JARC and New Freedom funds for this purpose, and demonstrate that no other sources of funds are available or are insufficient to meet this need. Also, provide an implementation plan and timelines for completing the capital project.

**3. Project Budget (20 point):** Projects must submit a clearly defined project budget, indicating anticipated project expenditures and revenues, including documentation of matching funds. Proposals should address long-term efforts and identify potential funding sources for sustaining the service beyond the grant period. Proponent shall demonstrate how using this funding leverages resources to the maximum possible extent.

**4. Coordination/Program Outreach (20 points):** Proposed projects will be evaluated based on their ability to coordinate with other community transportation and/or social service resources. Project sponsors should clearly identify project stakeholders, and how they will keep stakeholders involved and informed throughout the project. Project sponsors should also describe how they would promote public awareness of the project.

**5. Program Effectiveness and Performance Indicators (10 points):** The project will be scored based on the project sponsor's ability to demonstrate that the proposed project is the most appropriate match of service delivery to the need, and is a cost-effective approach. Project sponsors should identify clear, measurable outcome-based performance measures to track the effectiveness of the service in meeting the identified goals. A plan should be provided for ongoing monitoring and evaluation of the service, and steps to be taken if original goals are not achieved. Sponsor should describe steps to measure the effectiveness and magnitude of the impact that the project will have on residents.

## Scoring Matrix

Scoring Question	Possible Points
<b>Project Needs/Goals/Objectives</b>	
Does it cover an area targeted by the HSTP	15

Does the project establish, preserve, or improve mobility to a target population	10
<b>Implementation Plan</b>	
Is there a specific target population identified	10
Does applicant identify available transportation operators in the project area	10
Extent of the service provided by the project (days and hours)	5
<b>Project Budget</b>	
Is the match clearly identified and from an established, stable source	10
Does applicant provide methods to sustain service after the grant period	10
<b>Project Coordination/Outreach</b>	
Does the project involve collaboration by at least one other group not including entity providing matching funds	10
Does the applicant clearly describe how they will promote awareness of the project	10
<b>Project Effectiveness/Performance Measures</b>	
Is there a methodology identified or performance measures stated to monitor and evaluate the impact of the project in meeting its identified goals	10
<b>TOTAL SCORE</b>	<b>100</b>

## **ANNUAL PROGRAM OF PROJECTS DEVELOPMENT AND APPROVAL PROCESS**

The Program of Projects is determined by the scoring of applications by the GBNRTC Selection Review Committee, as approved by the GBNRTC Policy Planning Committee. Determining whether applicants are on the funded list or a stand-by list is a combination of available funding, whether there is a sub-recipient agreement in place, and the quality of the lower ranked applications.

The Program of Projects also reviewed at bi-annual review meeting with FTA is submitted through FTA's TEAM system initially as a draft. FTA Region II staff review the submission and ask any questions. When all questions and concerns are addressed, the request is formally submitted. JARC and New Freedom applications are made separately. JARC and New Freedom grant applications encompass both urbanized areas within the NFTA boundaries.

The program of Projects will also be made available to the public in local and regional newspapers. All open grants are reported upon annually, with milestones updated on a quarterly basis.

## **ADMINISTRATION, PLANNING AND TECHNICAL ASSISTANCE**

NFTA uses JARC and New Freedom funds up to the 10% limitation allowed by law to provide administration, planning and technical assistance to the program. JARC administrative funds are used to administer sub-recipient agreements, work with TEAM applications, and to provide other oversight over JARC and New Freedom activities by NFTA management personnel not directly funded by JARC. Technical assistance is provided to sub-recipients as needed to ensure their compliance with applicable federal regulations. The extent of coordination and administration required for these programs utilizes the full 10% allowance for such administrative activities.

## **TRANSFER OF FUNDS**

NFTA has no policy for the transfer of JARC or New Freedom funding to the Section 5311 Rural program, Section 5307 Formula Transit program, or for the transfer of flexible funds into the program. At the regional level, these are treated as self-contained programs, limited in scope to available federal funding.

## **PRIVATE SECTOR PARTICIPATION**

Projects proposed by private operators are also entertained under GBNRTC's TIP process. For these projects, public sponsorship is a prerequisite for receiving federal or state financial assistance. Programming of funds by GBNRTC is based on the priority of the service need and on integration of the service into the regional transit system. GBNRTC's has identified a set of policies and evaluation criteria with which to review private operator's proposals. Involvement in the planning process is encouraged through routine notification of private operators.

## **CIVIL RIGHTS**

NFTA is required to assure, and all sub-recipients are required as part of each application for federal assistance to assure that they are in compliance with all Federal civil rights requirements, including Title VI, EEO and DBE. Any required compliance reports are kept on file as required by the FTA.

Please refer to the following Circulars for further information:

C.4702.1B – Title VI and Title VI Dependent Guidelines for FTA Recipients

C.4704.1 – Equal Employment Opportunity Program Guidelines for Grant Recipients

49 CFR 23 – DBE

### TITLE VI

The Niagara Frontier Transportation Authority (NFTA), through its Title VI Program, will meet the following objectives:

- ❑ To ensure that FTA-assisted NFTA benefits and related services are made available and are equally distributed without regard to race, color, or national origin.
- ❑ To ensure that the level and quality of NFTA's services are sufficient to provide equal access and mobility for any person without regard to race, color, or national origin.
- ❑ To ensure that opportunities to participants in the transit planning and decision-making process within the NFTA are provided to persons without regard to race, color or national origin.
- ❑ To ensure that NFTA's decisions on the location of transit services and facilities are made without regard to race, color, or national origin.

- ❑ To ensure that corrective and remedial action is taken to prevent discriminatory treatment of any beneficiary of NFTA's services based on race, color, or national origin.

**General Requirements** -NFTA is required to submit to FTA, at least every three years, the following information:

- (1) a description of any lawsuits or complaints alleging discrimination in service delivery in the last year and the status or outcome;
- (2) a summary of all civil rights compliance review activities conducted in the last three years; and
- (3) an analysis of any environmental and/or social impacts as a result of proposed construction projects, including the impact on minority communities, for projects that do not qualify as a categorical exclusion in the environmental process.

It is anticipated that JARC and the New Freedom program will involve sub-recipients to NFTA, and that these requirements will also apply to these organizations. NFTA will meet and exceed the general requirements by requiring each sub-recipient to submit, with each payment application it files with NFTA, a certification regarding any lawsuits or discrimination complaints and a summary of any civil rights compliance review activities. It is also a question that must be addressed on each semi-annual report submitted by grant recipients.

The NFTA Title VI program was certified last in 2006 by the FTA and was updated in 2012. Prospective grantees are required as part of each application for capital assistance to assure that they are in compliance with all Federal civil rights requirements. Any required compliance reports, including any equity analysis completed due to changes in service or fares, are forwarded to NFTA for inclusion in reports to the FTA. Site visits include a review of sub-recipient compliance. Grantees may either follow their own procedures or adopt the NFTA procedure. A copy of each policy plan, complaint procedure, complaints, and notice of rights must be submitted to NFTA. Appendix A includes additional information regarding sub recipient monitoring and enforcement.

#### Equal Employment Opportunity (EEO) Requirements

“No person in the United States shall on the grounds of race, color, creed, national origin, sex, or age be excluded from participation in, or denied the benefits of, or be subject to discrimination under any project, program, or activity funded in whole or in part through financial assistance under this Act. The provisions of this section shall apply to employment and business opportunities and shall be considered to be in addition to and not in lieu of the provisions of the Title VI of the Civil Rights Act of 1964.”

NFTA and therefore all sub-recipients must not discriminate based any employee or applicant for employment because of race, color, creed, national origin, sex, age, or handicap. NFTA and therefore all sub-recipients must take affirmative action to ensure that applicants are employed, and that employees are treated during employment without regard to race, color, creed, national origin, sex or age. NFTA and therefore all sub-recipient must include a written, affirmative action plan designed to achieve full utilization of minorities and women in all parts of the workforce. NFTA and all sub-recipients must post in conspicuous places and make available to employers and applicants for employment, notices setting forth the recipient's EEO policy. In addition, applicants/employees will be notified of the sub-recipient's procedures for filing complaints of discrimination internally, as well as externally with EECO, a local human rights commission, and/or the U.S. Department of Transportation (DOT).

#### Disadvantaged Business Enterprise (DBE) Requirements

The awarded sub recipients must make a good faith effort to actively solicit business from the New York State certified DBE's. An updated list of all DBE certified firms in New York State may be obtained from the New York State Unified Certification Program website at [www.biznet.nysucp.net](http://www.biznet.nysucp.net).

## **SECTION 504 AND ADA REPORTING**

NFTA requires, as part of all applications for capital and operating assistance, that the sub-recipient assure that they are in compliance with the requirements of Section 504 of the Rehabilitation Act of 1973 and the Americans With Disabilities Act of 1990. Any written complaints alleging discrimination received are referred to the NFTA Legal Office.

Certification of continued compliance with ADA requirements are included as part of required semi-annual reports.

### **PROGRAM MEASURES**

The two measures established by the FTA for the JARC Program are:

1. Actual or estimated number of jobs that can be accessed as a result of geographic or temporal coverage of JARC projects implemented in the current reporting year.
2. Actual or estimated number of rides (as measured by one-way trips) provided as a result of the JARC projects implemented in the current reporting year.

NFTA & sub-recipients will be responsible for collecting and reporting this data for JARC projects.

The three measures established for the New Freedom Program are:

1. Increases or enhancements related to geographic coverage, service quality and/or service times that impact availability of transportation services for individuals with disabilities as a result of the New Freedom projects implemented in the current reporting year.
2. Additions or changes to environmental infrastructure (e.g. transportation facilities, side walks, etc.), technology, and vehicles that impact the availability of transportation services as a result of the New Freedom projects implemented in the current reporting year.
3. Actual or estimated number of rides (as measured by one-way trips) provided as a result of the New Freedom projects implemented in the current reporting year.

Sub-recipients under the New Freedom program will be specifically required to report on these measures as part of required reporting.

### **DESIGNATED RECIPIENT PROGRAM MANAGEMENT**

NFTA as the designated recipient thoroughly documents its compliance with FTA Program Management requirements through the Triennial Review process. The following discussion pertains to the delegation of compliance to sub-recipients, as will be needed under the JARC and New Freedom programs.

If selected for funding, the JARC and New Freedom applicants will be required to submit appropriate background Certifications and Assurances, and other documentation necessary to meet the requirements of the FTA’s Urbanized Area Formula Grant Program (Section 5307 program under Title 1, United States Code). Specific areas of monitoring are highlighted below:

**Satisfactory Continuing Control and Responsibility**

If a sub-recipient purchases a vehicle or other capital asset with JARC or New Freedom funds, NFTA will provide continuing control of the asset. The NFTA will place a lien on the asset as it enters the program, and include it in our asset inventory. The lien is maintained throughout the asset’s useful life and the NFTA is ultimately responsible for compliance with this requirement.

Insurance

All vehicles purchased with Section 5316 or 5317 funds must maintain insurance adequate to protect the Federal interest. The minimum required coverage is as follows:

- Automobile Liability Insurance (including mandatory personal injury protection)
  - Bodily Injury Liability
    - \$100,000 per person
    - \$300,000 per occurrence for 1-12 seating capacity
    - \$500,000 per occurrence for over 12 seating capacity
  - Property Damage Liability
    - \$50,000 per occurrence
  - Physical Damage (Collision & Comprehensive)
    - \$1,000 deductible

Sub-recipients in the Section 5316 or 5317 programs will be required to submit evidence of insurance on all Section 5316 or 5317 funded vehicles annually.

Useful Life Standards

The current useful life standards are as follows:

<u>Vehicle Type</u>	<u>Years or Miles</u>	
Accessible Cab	4	100,000
Van	4	100,000 <sup>2</sup>
12-25 passenger buses	5	150,000
32-40 passenger buses	10	350,000

**Productivity Standards**

NFTA proposes to adopt the productivity standards of the NYSDOT 5310 Program for a six month period are as follows for sub-recipients:

- Vehicle passenger capacity 7 or below: 1,000 passenger trips
- Vehicle passenger capacity 8-11: 1,500 passenger trips
- Vehicle passenger capacity 12 and above: 2,000 passenger trips

Exceptions may be made in more rural areas where much higher mileage yields far fewer passenger trips.

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<sup>2</sup> CFR 9030.1D

### Semi-Annual Reports

Semi-annual reports are required to be submitted on each asset that has been funded with Section 5316 or 5317 funding throughout its useful life. Grant recipients are not required to use a specific accounting system to prepare semi-annual reports as long as the system used provides accurate information.

### Site Visits

NFTA reserves the right to conduct site visits periodically to assure that vehicles or other assets are being used as described in the application and semi-annual reports, as well as to provide face-to-face technical assistance if necessary. A site visit review checklist is used to record findings at each property, and photos are taken of assets if possible. Any serious finding is followed up with a letter to the property and to create a plan for corrective action.

## **Maintenance**

### Vehicle Maintenance

All sub-recipients are required to show both the funding available for vehicle maintenance and to describe the preventive maintenance program they will use. Description of repairs and the amounts of money spent on each vehicle is part of each semi-annual report. Appendix B contains a sample Fleet Maintenance Plan. All preventative maintenance plans must be completed in accordance with the manufacture's recommendations.

### Maintenance To Comply With ADA

Each sub-recipient must attest that they will comply with all aspect of Americans with Disabilities Act. This is confirmed through each semi-annual report.

## **Competitive Procurement**

### Vehicle Procurement

The sub-recipients conduct the actual purchase of the equipment with the assistance of NFTA. The New York State Office of General Services, (OGS), the State's major procurement agency, can be used for such purchases, as long as documentation as to compliance with federal procurement regulations is retained. Similar to the Section 5310 Program, NYSDOT staff assures that the process has been consistent with federal and State regulations and that required federal clauses are included.

NFTA requires copies of all procurement documentation to ensure compliance with federal procurement regulations established in FTA Circular 4220.1 Third Party Contracting Guidance. For more detailed information regarding please refer to FTA Circular 4220.1 and 39 CFR Part 18.

All vendors bidding on contracts must supply proof that the vehicle being bid has been tested at the Altoona test facility, and must sign and comply with all federal requirements.

### Buy America

Buy America provisions are included in the State OGS bid solicitation documents for vehicles. Vendors are required to provide written certifications in their bid documents that they are in compliance with all applicable requirements.

Section 5316 and 5317 grant sub-recipients may purchase off these State contracts, but are not required to do so. If they go out to bid independently, certifications of compliance with federal procurement regulations must be followed.

NYS has not requested waivers to Buy America.

#### Debarment And Suspension

NFTA will not award any contract to an entity excluded by any federal agency. Vendors must certify that they are not excluded at the time of bid. NFTA periodically checks the GSA Excluded Parties List System (<http://epls.amet.gov>).

#### **Restrictions On Lobbying**

All sub-recipients for Section 5316 or 5317 funding must certify in their application that they will comply with the restrictions on lobbying should they be granted an award greater than \$100,000.

#### **Transportation Services For Individuals With Disabilities**

All vehicles purchased through the Section 5316 or 5317 programs must be wheelchair accessible. Condition and operation of wheelchair lift equipment is part of the site visit checklist. Any problems with wheelchair lifts or securement devices should be detailed in semi-annual reports.

#### **FTA Drug And Alcohol Program And Drug-Free Workplace**

Recipients or subrecipients that receive only Job Access and Reverse Commute (JARC), New Freedom, or Elderly Individuals and Individuals with Disabilities (Section 5310) Program assistance are not subject to FTA's Drug and Alcohol testing rules, but must comply with the Federal Motor Carrier Safety Administration (FMCSA) rule for employees who hold Commercial Driver's Licenses (CDLs) (49 CFR part 382). New Freedom recipients and subrecipients that also receive funding under one of the covered FTA programs should include any employees funded under New Freedom project in their testing program.

Section 5316 or 5317 sub-recipients are welcome to participate in training offered on drug and alcohol awareness.

#### **Charter Bus Protection**

All 5316 and 5317 sub-recipients will follow all requirements set forth in the new private charter operator regulations as follows:

Title 49 U.S.C. 5323(d) places limits on the charter services that Federally-funded public transportation operators may provide. The charter service regulation (49 CFR part 604) prohibits FTA recipients from providing any charter service using FTA funded equipment or facilities if there is at least one private charter operator willing and able to provide the charter service that the recipient proposes to provide. The regulation applies to both buses and vans. Any JARC recipient desiring to provide charter service must publish a notice annually and determine whether there are any private charter operators willing and able to provide the service. The designated recipient may conduct this process for itself and subrecipients or delegate this responsibility for the subrecipients to any or all of the subrecipients. The designated recipient must sign a charter agreement as part of the annual certifications and assurances and obtain and retain signed charter agreements from its subrecipients.

#### **School Bus Protections**

The Section 5316 or 5317 programs do not purchase any school buses. The applicant must also attest to compliance with the federal requirements. Continued compliance with the regulation is covered during site visits.



The purpose of this Agreement is to specifically outline the obligations, rights and responsibilities of the NFTA and Erie County with respect to the transfer from the NFTA to Erie County of monies received by the NFTA from the FTA pursuant to the Section 5317 New Freedom Program. These monies shall hereinafter be referred to as "New Freedom Funds."

Article 2. ERIE COUNTY DUTIES AND OBLIGATIONS

Erie County agrees to comply with all of the relevant terms and conditions of the following, to the same extent as if Erie County was the intended capital assistance recipient:

The Grant Agreement to be executed by the NFTA and the FTA, a copy of which will be annexed hereto as Exhibit A.

The October 1, 2014 FTA Master Agreement, a copy of which is annexed hereto as Exhibit B, and any subsequent changes in federal requirements related thereto.

49 C.F.R. Part 18.

FTA Circular 4220.1F, a copy of which is annexed hereto as Exhibit C.

OMB Circular A-87, a copy of which is annexed hereto as Exhibit D.

FTA Circular 9045.1

Article 3. REIMBURSEMENT

All requests for disbursements to the NFTA shall be supported by properly executed payrolls, time records, invoices, contracts or vouchers evidencing in detail the nature and propriety of the charges. No costs incurred prior to the date of Exhibit A shall be reimbursed unless specific written authorization from the FTA has been received. Erie County shall invoice the NFTA not more frequently than once per month. All invoices shall be certified by the Commissioner of Erie County Senior Services to be in compliance with the project scope as set forth in Exhibit A and all other relevant terms and conditions, including, but not limited to, those set forth in Article 2. NFTA has the ability to extend reimbursement to additional quantities of scope set forth in Exhibit A, given that such an extension does not modify the original intent of the Grant Agreement.

Article 4. AUDIT AND INSPECTION

Erie County shall permit the Secretary of Transportation and the Comptroller General of the United States, the FTA and the NFTA or their duly authorized representatives to inspect all work, data and records with regard to the project and to audit all of Erie County's books, records and accounts with regard to the Project. Erie County shall maintain all books, records and

accounts regarding the project for a period of not less than three years from the date of final completion of the Project.

Article 5. EXECUTORY AGREEMENT

This Agreement shall be deemed executory only to the extent of New Freedom Funds received by the NFTA from the FTA for this project, and no liability shall be incurred by the NFTA for this project beyond such capital assistance.

Article 6. INDEMNIFICATION

Erie County agrees to defend, indemnify and hold harmless the NFTA, its members, agents and employees, from and against any and all claims, suits, causes of action, damages, losses and expenses, including reasonable attorneys' fees, resulting from or arising out of the New Freedom Funds provided by the NFTA pursuant to this Agreement, including, but not limited to, any and all claims, suits, causes of action, damages, losses and expenses, including reasonable attorneys' fees, resulting from or arising out of the third party contracts financed with the capital assistance provided by the NFTA pursuant to this Agreement. Further, in the event the FTA subsequently disallows any of Erie County's expenses or disbursements, Erie County shall reimburse the NFTA for the full amount of the disallowance within fifteen business days from the receipt of notification from the NFTA of said disallowance.

Article 7. TERMINATION

The NFTA reserves the right to terminate this Agreement for convenience in the event, for whatever reason, the New Freedom Funds, which is the source of funding for this Agreement, is no longer available. The NFTA has the right to terminate this Agreement for default in the event Erie County fails to comply with any of the requirements of this Agreement, including, but not limited to, all of the items referenced in Article 2. In the event of a termination for default the NFTA will notify Erie County of the default in writing. Erie County must rectify the default within fifteen business days from the date of the notice or this Agreement will automatically terminate. In the event of a termination the terms of Articles 4 and 6 shall remain in effect and binding upon Erie County.

Article 8. APPROVAL

The NFTA reserves the right to approve in writing any and all agreements, documents and/or expenditures to be funded with assistance provided pursuant to this Agreement. Neither an approval by the NFTA nor a decision not to request approval pursuant to this Article shall mitigate Erie County's responsibilities pursuant to this Agreement.

Article 9. FEDERAL SHARE PARTICIPATION

This Agreement is funded up to 80% with federal funds on the capital portion of the project and up to 50% on the operations portion of the project.

Article 10. NON FEDERAL SHARE PARTICIPATION

The FTA requirement to provide the non-federal/state share to the project is the responsibility of Erie County. The NFTA will not provide any funds in support of this project.

Article 11. DOCUMENTATION AND CORRESPONDENCE

Formal project documents related to FTA requirements, such as grant agreements and/or amendments, shall be submitted by Erie County to the NFTA and then by NFTA to the FTA. Erie County shall prepare these documents consistent with FTA project management requirements. Project reporting documents, such as Progress and Financial Status Reports, shall be submitted by Erie County to NFTA for transmittal to FTA. The NFTA will provide Erie County with full copies of project transmittals to FTA. The Commissioner of Erie County Department of Senior Services shall be the contact person for project management and implementation. The NFTA will be provided with copies of all project documents and correspondence that affect project implementation at the time of transmittal. The NFTA Manager, Government Affairs and Manager, Service Planning shall be the recipient of project correspondence. The respective responsibilities of the parties are outlined on the Project matrix, a copy of which is annexed hereto as Exhibit F.

IN WITNESS WHEREOF, the parties have executed this Agreement as of the date first written above.

NIAGARA FRONTIER TRANSPORTATION AUTHORITY

\_\_\_\_\_  
Kimberley A. Minkel, Executive Director

ERIE COUNTY

\_\_\_\_\_  
Mark Poloncarz, County Executive

Figure 8- Verification of Title VI

**VERIFICATION OF TITLE VI ACTIVITIES BY SUBRECIPIENT**

Please read enclosed document before completing this form.

Subrecipient Name and address:

Agency's Designated Title VI Person:

Email:	Phone#:
--------	---------

**NOTICE TO BENEFICIARIES**

<b>Do You Have a Notice Published?</b>	<b>YES</b>	<b>NO</b>
--	------------	-----------

If YES, where is notice published?

- Website\*
- Brochure
- Timetable
- Signs Posted at Facility/Office
- Other

\* Federal requirements state that a Title VI Notice to Beneficiaries should be on an agency's website but a website alone does not satisfy the requirement. The Notice must appear in at least one other document or location widely available to users of the service.

If Other, please explain.

If NO, please provide estimated date Notice will be available and in what format.

**COMPLAINT PROCEDURE**

<b>Do You Have A Written Complaint Procedure?</b>	<input type="checkbox"/> YES	<input type="checkbox"/> NO
---	------------------------------	-----------------------------

If NO, please provide estimated date such a policy will be completed.

**RETURN THIS FORM NO LATER THAN TO:  
NFTA – Service Planning Dept., 181 Ellicott Street, Buffalo, NY 14203**

\_\_\_\_\_  
Authorized Representative Signature

\_\_\_\_\_  
Date

Figure 9 - Completed Site Visit

## JARC & New Freedom SITE VISIT CHECKLIST

<b>Project</b>	New Freedom – WNYIL NY-57-X047
<b>Date</b>	4/26/18
<b>Participants</b>	Cathy Colicchia (WNYIL), Rachel Maloney (NFTA), Nancy Peters (NFTA)

PROJECT PROFILE – a brief, 4 or 5 sentence overview of the project.		COMMENTS	REQUIRED FOLLOW-UP
Western New York Independent Living's (WNYIL) Moving Forward program is designed to fill gaps in the current transportation services to disabled individuals in underserved communities of Erie and Niagara Counties. The program seeks to reduce barriers to individuals with disabilities by providing transportation for these individuals to work, work related, and volunteer activities when public transportation is not available either because of service area restrictions or time gaps. The project includes the purchase of an accessible vehicle.			
<b>OUTCOME MEASURES</b>			
Total One-Way Passenger Trips – Service Only	reported on last entry report	removed Jan + Feb July	
Number of One-Way Trips for Target Population – Service Only	All targeted population	invoiced - Found a couple of trips that were cancelled on invoice it but not removed in the system. will be deducted from next invoice	confirm trips removed on next invoice
Access to Jobs – JARC Service Only	N/A		
<b>LOCAL OUTCOME MEASURES</b>			
Marketing Plan for Project	no formal plan to review	however program has a brochure	
<b>FINANCIAL:</b>		<b>COMMENTS</b>	<b>REQUIRED FOLLOW-UP</b>
Contracts w/ agencies	N/A		
Monthly statements/reports	invoices + reports are on time + up to date		

Local Share Certification	Local share is agency funded	
Contract for service	N/A	
Fare Reconciliation	> passengers do not pay for service no cash exchanged or handled	
Cash Handling	✓	
Most Recent Invoice/Budget		
Most Recent Audit	received audit	
<b>COMPLIANCE:</b>	<b>COMMENTS</b>	<b>REQUIRED FOLLOW-UP</b>
Drug and Alcohol	renewed copy of policy - policy is for everyone 19A for drivers - physical sticker of policy in van → verified	physical drug test
Title VI	N/A	
DBE	on tip when awarded - went through local process	
TIP (Transp. Improvement Plan)		
Notarized copy of public hearing announcement	N/A	
ADA Vehicle Usage	✓	
<b>CAPITAL PROJECTS</b>	<b>COMMENTS</b>	<b>REQUIRED FOLLOW-UP</b>
Status of Milestone Dates	capital purchase complete	
(list individual project items)		
Buy America	completed. audited by NFTA internal audit dept when purchased	
<b>VEHICLES</b>	<b>COMMENTS</b>	<b>REQUIRED FOLLOW-UP</b>
First Aid Kit	✓ see pictures → fire extinguisher ✓	

## Chapter 8: Determination of Site or Location of Facilities

*Requirement: Title 49 CFR Section 21.9(b)(3) states, "In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part." Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, "The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin." For purposes of this requirement, "facilities" does not include bus shelters, as these are transit amenities and are covered in Chapter IV, nor does it include transit stations, power substations, etc., as those are evaluated during project development and the NEPA process. Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc.*

### **Response:**

The NFTA has not constructed any new storage/maintenance facilities or operations centers since the 2015 Title VI submission.

## Chapter 9: System-Wide Service Standards and Policies

*Requirement: Title 49 CFR Section 21.5 states the general prohibition of discrimination on the grounds of race, color, or national origin. Section 21.5(b)(2) specifies that a recipient shall not “utilize criteria or methods of administration which have the effect of subjecting persons to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program with respect to individuals of a particular race, color, or national origin.” Section 21.5(b)(7) requires recipients to “take affirmative action to assure that no person is excluded from participation in or denied the benefits of the program or activity on the grounds of race, color, or national origin.” Finally, Appendix C to 49 CFR part 21 provides in Section (3)(iii) that “[n]o 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.”*

### **Response:**

NFTA has established system-wide service standards. These were initially approved in 1992, reaffirmed in 1995 and were updated and adopted by the Board of Commissioners on July 23, 2012. The guidelines are included. NFTA has adopted these system-wide service policies in order to guard against service design and operational policies that could have disparate impacts on a particular portion of the population. Service-policy requirements include areas related to vehicle assignment, amenity locations, bus shelter placements, and transit security. NFTA’s Metro Bus and Rail Service Delivery and Evaluation Guidelines as well as our Shelter Placement policy is included below.

### **Vehicle Assignment:**

The NFTA’s bus fleet is comprised of several different models but all provide the same passenger amenities, such as air conditioning, wheelchair lifts or ramps and all models are distributed fairly equally between NFTA’s three bus garage locations. Bus fleet information is shown below. An APC bus deployment plan was developed to ensure that newer APC buses are statistically assigned to all different routes within each garage. Approximately 90% of the NFTA big bus fleet and 32% of small fleet is equipped with APC technology. Each week the three garages receive a deployment plan to assign different buses on specific routes including minority routes. A copy of an APC deployment plan for Babcock Garage is included. We have found that after reviewing the garage bus assignment logs, newer buses are equally assigned to minority and non-minority routes.

All rail cars are air conditioned. Each underground station is accessible and each above ground station has one accessible platform.

Figure 10 - Fixed Route Fleet Information

3/31/2018					BUS FLEET INFORMATION - 12 YEARS / 500,000 MILES															
BUS INFORMATION					SUB FLEET INFORMATION															
Fleet Designation	Year	Make	Model	Length	Avg % Consumed Useful Life - Age	Avg % Consumed Useful Life - Miles	Average Age/Years	Average Miles	Buses Beyond Useful Life - Age	Buses Beyond Useful Life - Miles	Beyond Useful Life - Age & Miles	Scheduled			Actual			Total # of Buses in Subfleet	Percentage of Fleet	
												Babcock	Cold Spring	Frontier	Babcock	Cold Spring	Frontier			
2000	1999	Nova	LFS 40	40'	151%	104%	18.1	518,608	5		15			20			20		6.2%	
2100B	2001	Gillig	G18D102N4	40'	136%	102%	16.3	509,803	4		17		21			21		21	6.5%	
2200A	2002	Gillig	G18D102N4	40'	131%	136%	15.7	679,626			12				12		12	12	3.7%	
2200B	2002	Gillig	G18D102N4	40'	128%	132%	15.3	662,447	1		6			7		7	7	2.2%		
2400	2004	Gillig	G29E102R2	30'	138%	143%	13.8	500,957			22		5	5	12	5	5	12	22	6.9%
2500	2005	Gillig	G29D102N4	40'	107%	85%	12.9	425,735	13				13			13		13	4.0%	
2600	2006	Gillig	G29D102N4	40'	97%	72%	11.7	358,835					30			30		30	9.3%	
2700	2007	Gillig	G30D102N4	40'	88%	79%	10.5	392,598					7	6		7	6	13	4.0%	
1000A	2010	Gillig	G30D102N4	40'	67%	68%	8.0	337,944							11		11	11	3.4%	
1000B	2010	Gillig	G27D102N4	40'	62%	61%	7.4	303,742					18	30	6	18	30	6	54	16.8%
1000C	2010	Gillig	G27D102N4	40'	58%	64%	7.0	317,927							2		2	2	0.6%	
1100A	2011	Gillig	G30D102N4	40'	57%	45%	6.9	224,449							24		24	24	7.5%	
1100B	2011	Gillig	G30D102N4	40'	56%	43%	6.7	213,417						5		5	5	1.6%		
1100C	2011	Gillig	G27D102N4	40'	57%	41%	6.9	204,008						1		1	1	1	0.3%	
1200A	2012	Gillig	G30D102N4	40'	49%	39%	5.9	196,328					12	1		12	1	13	4.0%	
1200B	2012	Gillig	G27D102N4	40'	49%	31%	5.9	156,071						1		1	1	1	0.3%	
1300	2013	Gillig	G27D102N4	40'	39%	43%	4.7	212,936							4		4	4	1.2%	
1500	2015	Nova Bus	LFS 40	40'	16%	18%	2.0	89815							20		20	20	6.2%	
1600	2016	Nova Bus	LFS 40	40'	14%	16%	1.7	80118							24		24	24	7.5%	
1700A	2017	Nova Bus	LFS 40	40'	14%	16%	0.8	51521							16		16	16	5.0%	
1700B	2017	Nova Bus	LFS 40	40'	0%	0%	0.9	33974							8		8	8	2.5%	

Figure 11 - Paratransit Fleet Information

3/31/2018		SMALL BUS FLEET INFORMATION - 5 YEARS / 150,000 MILES											
BUS INFORMATION					SUB FLEET INFORMATION								
Fleet Designation	Year	Make	Model	Length	Avg % Consumed Useful Life - Age	Avg % Consumed Useful Life - Miles	Average Age / Years	Average Miles	Buses Beyond Useful Life - Age	Buses Beyond Useful Life - Miles	Beyond Useful Life - Age & Miles	Total # Buses in Subfleet	Percentage of Fleet
8100 C	2008	Coach & Equip	Phoenix	26	188%	243%	9.4	364,005	0	0	4	4	5.4%
8100 D	2008	Coach & Equip	Phoenix	26	173%	214%	8.6	321,729	0	0	5	5	6.8%
8100 E	2010	Coach & Equip	Phoenix	26	155%	201%	7.8	301,664	0	0	5	5	6.8%
8100 F	2011	Coach & Equip	Phoenix	26	136%	190%	6.8	284,309	0	0	10	10	13.5%
8200 A	2012	Coach & Equip	Phoenix	22	106%	130%	5.3	194,502	0	0	16	16	21.6%
8200 B	2013	Coach & Equip	Phoenix	22	96%	113%	4.8	169,252	0	13	0	14	18.9%
8300	2016	Coach & Equip	Phoenix	24	35%	40%	1.8	59,473	0	0	0	10	13.5%
8200 C	2017	Coach & Equip	Phoenix	22	14%	25%	0.7	37,913	0	0	0	10	13.5%

Figure 12 - Example of APC Deployment

```

\NFTA_GUI_Deployment_v7.sps
PAGE 1

*****
BABCOCK GARAGE
APC DEPLOYMENT PLAN - WEEKDAY
WEEK BEGINNING: SUNDAY APR 29,2018
*****

DAY OF WEEK   DATE       AM/PM   BLOCK   BLOCK   BLOCK   NTD   BUS
              DATE       BLOCKS  BLOCK   PULL    PULL    SAMPLE  NUMBER
              -----  -----  -----  -----  -----  -----  -----
MONDAY        04/30/2018  AM

              19001   426    1228
              2001   435    1224
              15002   451    1240   YES
              14002   504    1215
              6004   533    935
              14003   535    1058
              16004   536    930
              32006   550    1139
              16005   604    1043   YES
              15006   634    934
              2006   701    1547
              32019  1120   1641
              76003  1146   1551
              _____

              PM

              19010   1206   1635
              1005   1211   1739
              19012   1226   1649
              4008   1241   1604
              1006   1241   1629
              4009   1301   1729   YES
              4010   1336   1622
              106002  1350   1720
              42005   1410   1637
              1009   1416   2241
              19018   1436   1708
              19020   1445   1818
              32030   1735   2520   YES
              _____

BLOCKS:                26

Urban Transportation Associates
    
```

\*\*\*\*\*  
 BABCOCK GARAGE  
 APC DEPLOYMENT PLAN - WEEKDAY  
 WEEK BEGINNING: SUNDAY APR 29, 2018  
 \*\*\*\*\*

DAY OF WEEK	DATE	AM/PM BLOCKS	BLOCK	BLOCK PULL OUT	BLOCK PULL IN	NTD SAMPLE BLOCK	BUS NUMBER
TUESDAY- (SCHOOL CUTS)	05/01/2018	AM					
			6001	421	1140		_____
			16002	446	1238		_____
			6003	451	1337	YES	_____
			4002	514	1341		_____
			1002	524	1408		_____
			69001	603	804		_____
			42002	610	1037		_____
			14005	618	857		_____
			6009	625	955		_____
			75002	706	834		_____
			32015	1011	1909	YES	_____
			32017	1110	1955		_____
			32019	1120	1641		_____
		PM					
			19009	1203	1623		_____
			32020	1208	1711		_____
			2009	1216	1944	YES	_____
			6013	1221	2011		_____
			4007	1228	1936		_____
			19015	1306	1813		_____
			32023	1321	1852		_____
			32024	1340	1834		_____
			15012	1345	1700		_____
			42007	1610	2448		_____
			4012	1621	2448		_____
			15019	1642	2511		_____
			6020	1713	2541		_____
BLOCKS:			26				

Urban Transportation Associates

\*\*\*\*\*  
 BABCOCK GARAGE  
 APC DEPLOYMENT PLAN - WEEKDAY  
 WEEK BEGINNING: SUNDAY APR 29, 2018  
 \*\*\*\*\*

DAY OF WEEK	DATE	AM/PM BLOCKS	BLOCK	BLOCK PULL OUT	BLOCK PULL IN	NTD SAMPLE BLOCK	BUS NUMBER
WEDNESDAY- (SCHOOL CUTS)	05/02/2018	AM	1001	451	1239	YES	_____
			76001	531	750		_____
			32005	540	1032		_____
			19005	559	1308		_____
			42001	601	1046		_____
			32007	605	1134		_____
			74002	625	801		_____
			19006	627	828		_____
			32013	645	1059		_____
			72001	650	839		_____
			6010	1020	1826		_____
			14008	1030	1543		_____
			32018	1120	1916	YES	_____
		PM	19013	1227	1604		_____
			14010	1241	1751		_____
			6014	1256	1817		_____
			6016	1326	1757		_____
			14011	1330	2222		_____
			15011	1334	1749		_____
			1008	1359	1844		_____
			16012	1430	1756		_____
			2011	1436	1709		_____
			16014	1438	1810		_____
			32027	1455	1656		_____
			15018	1509	2412		_____
			32028	1551	2440		_____

BLOCKS: 26

\*\*\*\*\*  
 BABCOCK GARAGE  
 APC DEPLOYMENT PLAN - WEEKDAY  
 WEEK BEGINNING: SUNDAY APR 29, 2018  
 \*\*\*\*\*

DAY OF WEEK	DATE	AM/PM BLOCKS	BLOCK	BLOCK PULL OUT	BLOCK PULL IN	NTD SAMPLE BLOCK	BUS NUMBER
THURSDAY- (SCHOOL CUTS)	05/03/2018	AM					
			16001	433	1313		_____
			19002	441	1248		_____
			32001	444	1259	YES	_____
			16003	454	1317		_____
			2002	500	1259		_____
			32004	524	1109		_____
			6008	615	1139		_____
			4005	634	924		_____
			19007	636	804		_____
			2007	916	1329		_____
			14009	1145	1958	YES	_____
			15010	1146	1832		_____
			2008	1146	1717		_____
		PM					
			32022	1310	1809		_____
			6015	1311	2133		_____
			6017	1341	1812		_____
			16011	1353	2255		_____
			15013	1354	1826		_____
			15014	1404	1836		_____
			32025	1405	2214	YES	_____
			32026	1435	2334	YES	_____
			2012	1501	2346		_____
			4011	1506	2356	YES	_____
			6019	1523	2431		_____
			42006	1601	2431		_____
			32029	1721	2537		_____
BLOCKS:			26				

Urban Transportation Associates

\*\*\*\*\*  
 BABCOCK GARAGE  
 APC DEPLOYMENT PLAN - WEEKDAY  
 WEEK BEGINNING: SUNDAY APR 29, 2018  
 \*\*\*\*\*

DAY OF WEEK	DATE	AM/PM BLOCKS	BLOCK	BLOCK PULL OUT	BLOCK PULL IN	NTD SAMPLE BLOCK	BUS NUMBER
FRIDAY	05/04/2018	AM					
			16001	433	1313		_____
			16003	454	1317		_____
			32004	524	1109		_____
			16005	604	1043	YES	_____
			6008	615	1139		_____
			19007	636	804		_____
			32012	640	808		_____
			19008	656	1014		_____
			15007	700	1014		_____
			42003	1016	1911		_____
			16008	1053	1901	YES	_____
			14009	1145	1958	YES	_____
			2008	1146	1717		_____
		PM					
			19011	1207	1753	YES	_____
			6016	1326	1757		_____
			14011	1330	2222		_____
			1008	1359	1844		_____
			74004	1425	1741		_____
			19019	1440	1738		_____
			15016	1445	1756		_____
			32027	1455	1656		_____
			69002	1521	1844		_____
			42006	1601	2431		_____
			16016	1656	2509	YES	_____
			19023	1658	2526	YES	_____
			19024	1727	2516	YES	_____

BLOCKS: 26

## **Transit Amenities**

The NFTA does not have the authority to site transit amenities such as benches and trash receptacles on property other than their own. It is the practice of NFTA to put such amenities at stops where shelters are located. NFTA's Bus Shelter Placement Policy, adopted in 2007 is included later in this chapter. In addition to amenities at bus shelters, NFTA places benches and trash receptacles at each rail station, both under and above ground. Underground rail stations have escalators and an elevator.

### Distribution of Transit Amenities

#### Shelters:

NFTA's Bus Shelter Placement Policy, adopted in 2007 is included. The goal of the policy is to locate shelters based on need and relevance. In addition, it is the policy to maintain public and private partnerships for "adopt-a-stop" programs for additional amenities at shelters and stops. Distribution of other amenities is based on the placement of shelters.

#### Benches:

It is the policy of the NFTA to place benches at bus shelters. NFTA does not place stand-alone benches at bus stops. NFTA places benches at each rail station, both below and above ground.

#### Information:

Timetables and route maps are posted at rail stations and transit centers and on our website. Passenger information displays (PIDs) are located at each rail station. 12 digital signs provide real-time and scheduled data at select rail and bus stations. A kiosk is located in Allen Medical Metro Rail Station which provides interactive information to customers.

#### Escalators and Elevators:

In compliance with the Americans with Disability Act (ADA) requirements, NFTA has escalators and elevators at each underground rail station to provide vital access to the system, particularly for persons with disabilities.

#### Waste Receptacles:

It is the policy of NFTA to not site waste receptacles at bus stops; however trash receptacles are located and maintained at all rail stations and transit centers.

#### Park and Rides:

It is the policy of NFTA to place Park and Rides at locations with viable parking that are located in proximity to existing transit service. Park and Rides are sited based on demand.

## **Transit Security**

The NFTA has a multi-layered security strategy in place utilizing both advanced technologies and trained employees. The System Security Plan has been refined over the past seven years and has been reviewed and accepted by TSA and the Public Transportation Safety (& Security) Board, the New York State Safety Oversight Agency.

The technologies utilized include CCTV cameras with analytics as well as various sensors throughout the public side of the NFTA facilities, rolling stock, and restricted areas. These technologies have been integrated together to form a cohesive security system. Our Operations Control Center is staffed 24/7 by Bus and Rail Controllers as well as highly trained Police Officers that monitor all of the security systems.

The NFTA has been conducting Terrorism Awareness training for our front-line employees since 1998. Over the last five years we have also included training in Behavioral Awareness, Improvised Explosive Devices, Identifying and Reporting Suspicious Behaviors, and other security topics to those employees.

The NFTA works closely with all emergency response agencies that operate within both Erie and Niagara Counties, as well as the City of Buffalo. Our emergency response plans are integrated with the responding agencies plans and they are tested through exercises multiple times per year. The NFTA works closely with the counties and the city in developing the Emergency Response Plans that are utilized. Additionally, NFTA Management has been trained and certified to the NIMS standards including ICS100, ICS200, and ICS300. We are integrated into the Incident Command System for the region whenever a large-scale event occurs here no matter what the disaster is and provide staff to the Emergency Operations Center (EOC).

**Niagara Frontier  
Transportation Authority  
Metro Bus & Rail  
Service Delivery and  
Evaluation Guidelines**

**June 2012**  
Adopted, July 23, 2012



## Introduction

Transit service delivery and evaluation guidelines provide an objective basis for assessing the performance of existing transit service, identifying unmet transit service needs, designing and evaluating new service proposals and recommending changes and/or improvements to existing service. The NFTA Board of Commissioners initially approved service standards in 1992 and reaffirmed them in 1995. These revised/new service guidelines and standards were developed based on current industry practices and the service framework and guiding principles for change recommended in the recently completed Erie County Transit Service Restructuring and Fare Study-Strategic Assessment. The service framework and principles are summarized as follows.

Metro should:

- Serve key markets and focus on high demand areas and corridors to achieve greater ridership and productivity.
- Design service and fare structures to be easy to understand and to use.
- Encourage spontaneous use with regular and frequent service.
- Provide for a positive customer experience.
- Maximize network cost effectiveness and efficiency.
- Design highly efficient service in terms of routes and schedules.
- Design and plan a financially sustainable system and provide a platform for future transit investment.

Metro will regularly monitor and update transit service statistics and metrics quarterly and will review the performance of each route annually. That review will provide the basis for developing service adjustments to best meet local needs within the framework of the service guidelines and standards and the funding and resources available.

## Route Types

It is important to distinguish among the various types of routes operated by Metro. These routes types are defined below. A number of service guideline categories have different requirements depending on route type.

- **Primary/Core** routes generally operate along major travel corridors mostly in Buffalo and the first ring suburbs and provide a high level of service. These routes also generally exhibit above average ridership (e.g. more than 2,000 average weekday boardings) and financial performance. Metro Rail is included in this category.
- **Secondary routes** generally operate along secondary corridors including crosstown service in Buffalo and service oriented to suburban areas. In most cases they are designed to connect with and support the primary routes.
- **Limited Express** routes provide commuter type service between suburban areas and outlying municipalities and downtown Buffalo during peak periods. They operate in both

Erie and Niagara Counties and mostly over Expressways. They provide regional service with fewer stops to provide a more direct experience.

- **Local Collector Express** routes provide commuter type service between suburban areas or outlying municipalities and downtown Buffalo during peak periods. They operate in both Erie and Niagara Counties over both local roads and Expressways.
- **Community Circulator** routes provide localized service in specific communities. They operated in both Erie and Niagara Counties.
- **School Day Only** routes operate primarily within the City of Buffalo and are designed and adjusted annually based on high school enrollment and student travel patterns to supplement regular fixed route service during peak periods.

## Guidelines & Standards for Design and Delivery of Service

### Service Coverage:

Coverage refers to the geographic extent of fixed route transit service within Metro's service area. Transit systems are not able to provide transit service to every potential rider who needs or wants service as such universal service would be prohibitively expensive. Metro's service coverage guidelines prescribe transit availability based on transit demand potential along with development patterns and significant activity centers. Transit demand potential is measured by a transit orientation composite index that summarizes five key transit supportive demographic characteristics including population density, financially disadvantaged (in poverty) population, zero vehicle households, youth population and senior population for each census tract/traffic analysis zone in Metro's service area. Each census tract/traffic analysis zone is ranked as having very high, high, moderate, low or very low transit demand potential. Based on these rankings the following guidelines for service coverage should apply.

- Metro fixed route service should be available within:
  - ¼ mile of areas with high or very high transit demand potential.
  - ½ mile of areas with moderate transit demand potential.
- Areas with low or very low transit demand potential do not warrant regular fixed route service; however, limited fixed route or alternative services will be evaluated based on a demonstrated demand, the cost of providing service and the availability of resources.
- Metro will also strive to provide service within ¼ mile of significant activity centers, such as employers, health care facilities, regional retail centers, educational institutions and social service facilities.

### Route Design –Directness

Metro routes shall be designed to operate as directly as possible to and/or from a major destination in order to minimize passenger travel time.

- Routes should operate on major arterial streets as much as possible.

- To the extent possible, two-way service should be provided on the same street.
- Express service should be routed in the most direct manner with the least number of stops possible.
- Deviations from the basic route alignment to serve activity center or high potential demand neighborhoods should only be made when they have the potential to attract a significant number of new riders equal to or exceeding the riders per hour standard for the corresponding route category.
- Additional time to operate route deviations should not exceed five minutes (one-way) or ten percent of the one-way run time, whichever is less.

### Route Design – Variations

It is sometimes more efficient to provide service to a certain area with one route having several branches than to operate several different routes. In addition, some bus trips on a route may not go to the end of the line due to very low ridership in that area at certain times during the day (i.e. turn back/short turn). To provide a user-friendly service and to encourage maximum use of the system by all current and potential riders, the following guidelines shall apply:

- A route should have no more than two distinct branches/variations.
- A route should have no more than one turn back/short turn.

### Span of Service/Hours of Operation

Span of service refers to the hours that service is available and is measured as the time between the first trip and last trip operated on a route. A wider span allows for more flexibility for passengers who work second shifts or use transit for non-work trips, but requires more service and higher operating costs. The table below displays the span of service guidelines by route type. Ridership levels on individual routes and funding levels may determine a shorter or longer span of service than the guideline listed.

<b>Span of Service</b>		
<b>Weekday</b>		
<b>Primary/Core</b>	6:00 am to 12:00 am	18 Hours
<b>Secondary</b>	6:00 am to 9:00 pm	15 Hours
<b>Limited Express</b>	AM and PM peaks	
<b>Collector Express</b>	AM and PM peaks	
<b>Community Circulator</b>	Will vary by route based on demand	
<b>School Day Only</b>	AM and PM peaks	

<b>Span of Service</b>		
<b>Saturday</b>		
<b>Primary/Core</b>	7:00 am to 11:00 pm	16 Hours
<b>Secondary</b>	7:00 am to 7:00 pm	12 Hours
<b>Limited Express</b>	No Service Operated	

<b>Collector Express</b>	No Service Operated
<b>Community Circulator</b>	Will vary by route based on demand
<b>School Day Only</b>	No Service Operated

<b>Span of Service</b>		
<b>Sunday</b>		
<b>Primary/Core</b>	7:00 am to 10:00 pm	15 Hours
<b>Secondary</b>	9:00 am to 7:00 pm	10 Hours
<b>Limited Express</b>	No Service Operated	
<b>Collector Express</b>	No Service Operated	
<b>Community Circulator</b>	Will vary by route based on demand	
<b>School Day Only</b>	No Service Operated	

### Service Frequency

Service frequency can have a major influence on transit ridership and attracting new riders, but at the same time frequency has a significant impact on transit operating costs and vehicle requirements. Therefore it is important to balance service frequency with existing ridership, the potential to attract new riders and available resources. The frequency of service on a particular route (i.e. headway of time interval between scheduled trips) will be based on the existing and/or projected ridership. Service will operate more frequently on high-demand routes and during peak periods. Guidelines for service frequency are listed below and will be applied to assure that a reliable and attractive, but appropriate level of service is available throughout the day. Clock face headways (e.g. every 15, 20, 30 or 60 minutes) should be maintained whenever possible. This helps make the service easier to understand, more predictable to the rider and can help facilitate better transfer connections.

<b>Service Frequency</b>					
<b>Route Type</b>	<b>Weekday</b>			<b>Saturday</b>	<b>Sunday</b>
	<b>Peak</b>	<b>Base</b>	<b>Evening</b>	<b>Base</b>	<b>Base</b>
<b>Primary/Core</b>	10 min.	30 min.	60 min.	60 min	60 min
<b>Secondary</b>	15 min.	40 min.	120 min.	120 min.	120 min.
<b>Limited Express</b>	As needed during peak periods			No Service Operated	
<b>Collector Express</b>	As needed during peak periods			No Service Operated	
<b>Community Circulator</b>	As needed will vary by route				
<b>School Day Only</b>	As needed during peak periods			No Service Operated	

### Passenger Load Guidelines

The intent of load guidelines is to balance passenger comfort and safety with operating costs and efficiencies. Most passengers should be able to obtain a seat on a Metro vehicle for at least a major portion of the trip. During peak travel periods, some patrons may be required to stand. There is an acceptable number of standees before the bus is considered overcrowded. Also, the maximum time that an individual passenger should be expected to stand on a given trip is 15 minutes. The load

guidelines shown below represent the total number of riders as a percent of the number of seats on the vehicle.

<b>Passenger Load Guidelines</b>		
<b>Route Type</b>	<b>Peak Hours</b>	<b>Off-Peak Hours and Weekends</b>
<b>Primary/Core</b>	140%	120%
<b>Secondary</b>	120%	100%
<b>Limited Express</b>	100%	No Service Operated
<b>Collector Express</b>	100%	No Service Operated
<b>Community Circulator</b>	120%	100%
<b>School Day Only</b>	140%	No Service Operated

If routes or trips exceed the maximum load factor on a regular basis or over a sustained period of time, Metro will evaluate the potential for improving the service frequency or adjusting schedule times.

### **Service Reliability**

It is critical that Metro customers have confidence and a reasonable guarantee that Metro service will operate reliably and in accordance with published timetables. No Metro vehicles should arrive before the scheduled time; however, vehicles may operate late for a variety of reasons including varying traffic and weather conditions, construction activity, mechanical breakdowns, detours and accidents. Every effort will be made to ensure that all Metro vehicles operate on-time and the following on-time performance standard shall apply for all types of service.

- 84% of all vehicles should arrive at scheduled time points on-time.

If a route or individual trip is consistently running late, then a review of the schedule will be conducted to determine the cause and modifications to the schedule or running times will be initiated at the earliest opportunity.

Metro, like all other transit agencies, occasionally misses scheduled trips due to mechanical problems, accidents or shortage of drivers or vehicles. Every effort is made to operate 100 % of scheduled trips; however, the following annual guidelines for missed trips shall apply for all types of service.

- A minimum of 99% of annual scheduled trips shall be operated.

### **Bus Stop Placement and Spacing**

Bus stop location and spacing are important to existing and potential passengers in terms of the accessibility of transit. Bus stop placement requires a balance between maximizing customer access and minimizing service delays as well as a sensitivity to adjacent land uses. With an inadequate number of stops, passengers may be discouraged from accessing the system. With too many stops, the service is slowed and can become less attractive to customers. In addition, customers must feel comfortable waiting at a stop and the impacts on adjacent property owners should be minimized to the extent possible.

The following factors are considered by Metro in the placement of bus stops.

- Walking access distance for passengers traveling to and from stops.
- Operational safety for buses and bus operators.
- Providing a relatively safe and comfortable waiting area for passengers.
- Minimizing operating delays in terms of the proximity of adjacent stops.
- Impacts on adjacent properties.

Generally, bus stop spacing should be closer together in urbanized areas and further apart in suburban and outlying areas. In rural areas “flag stops” may be offered. Metro’s current bus stop spacing guidelines are related to residential density along a route as listed below.

<b>Bus Stop Placement and Spacing</b>	
<b>Persons per Sq. Mile</b>	<b>Stop Spacing</b>
Over 5,000	Every Other Block
2,000 – 5,000	5 to 7 per mile
Under 2,000	Flag Stop

### **Productivity and Economic Performance Guidelines**

Metro uses ridership productivity and economic performance as its primary measures of transit performance. Ridership productivity is measured in terms of the number of passengers carried for each hour of service provided and economic performance is measured in terms of farebox recovery or the ratio of farebox revenue to operating costs. A target performance guideline for each of these measures is calculated for each route type as the average of all routes in the route type. Routes that fall below the productivity and economic performance guideline will be targeted for review and a range of actions will be recommended to improve ridership and productivity.

### **Ridership Productivity**

Passenger boardings per revenue hour are calculated by dividing the number of average weekday boardings per route (reported by Metro’s Automatic Passenger Counter (APC) data) by the weekday number of revenue hours of service. This measure is calculated and monitored quarterly. The passenger per revenue hour guideline is based on existing conditions, historical trends, vehicle capacity, comparison with peer agencies, and nature of route type.

<b>Passengers per Hour Guideline</b>			
<b>Route Type</b>	<b>Weekday</b>	<b>Saturday</b>	<b>Sunday</b>
<b>Primary/Core</b>	37	37	26
<b>Secondary</b>	24	21	15
<b>Limited Express</b>	18	No Service Operated	
<b>Collector Express</b>	20	No Service Operated	
<b>Community Circulator</b>	8	8	8
<b>School Day Only</b>	28	No Service Operated	

## Farebox Recovery

The ratio of farebox revenue to operating costs is an important measure of the economic effectiveness of Metro’s service. System wide farebox recovery is calculated and monitored monthly. Route level farebox recovery is calculated and monitored quarterly. The farebox recovery for each route type as shown below is based on existing conditions, historical data, comparison with other peer agencies’ recovery, productivity and efficiency of operational resource utilization.

<b>Farebox Recovery Guideline</b>			
<b>Route Type</b>	<b>Weekday</b>	<b>Saturday</b>	<b>Sunday</b>
<b>Primary/Core</b>	40%	39%	27%
<b>Secondary</b>	25%	22%	16%
<b>Limited Express</b>	19%	No Service Operated	
<b>Collector Express</b>	21%	No Service Operated	
<b>Community Circulator</b>	7%	8%	8%
<b>School Day Only</b>	26%	No Service Operated	

## Service Evaluation Process

The objectives of the service evaluation process are to determine that the service being operated represents the most cost-effective use of available resources and to improve service design and productivity. The application of the productivity and economic standards described in the previous section is a flexible process and other factors may be considered in the evaluation process. An annual report detailing the performance evaluation and recommendations for addressing poorly performing service will be prepared and reviewed with the NFTA Board.

## Evaluation of Existing Service

Route performance will be evaluated on an annual basis or as necessary based on funding considerations using the following measures:

- **Average number of weekday riders** and the trend over a 3-year time period.
- **Riders per revenue hour** compared to the established standard.
- **Farebox recovery** compared to the established standard.
- **Community service needs**, such as the existence of medical facilities, locations that service seniors, people with disabilities or low income populations that depend on public transportation.
- **Business arrangements**, either existing or proposed with employees, colleges/universities or other institutions will be considered.

## **Actions to Improve Ridership and Productivity**

Routes that are identified as underperforming based on the above noted target guidelines will be evaluated in an appropriate level of detail to determine the causes of the below average performance. In addition, employee, customer and stakeholder input may be considered.

Following are a series of potential actions to be recommended to improve a route's performance:

- **Routing adjustments** such as realigning or discontinuing unproductive segments of a route or reorganizing a group of routes.
- **Marketing and promotional strategies.**
- **Operational adjustments**, including adjusting headways or frequency of service, adjusting the span of service, eliminating service at specific time periods or deleting specific trips.

If service productivity cannot be improved through any of the above actions or if budgetary considerations require it, then a poor performing route should be considered for elimination.

In addition, the evaluation of existing routes is not intended to preclude changes to routes that meet minimum target guidelines and are performing adequately. It may be possible to improve the productivity of these routes by making minor changes to service frequency, span of service or trip times. There will always be a need for minor changes and operational adjustments on a regular basis based on performance monitoring, customer comments and employee feedback.

## **Evaluation of New Service Proposals**

New service proposals or requests will be evaluated in terms of market potential, community or business support, public/private partnership opportunities, vehicle and operator availability and cost to determine the likelihood of meeting or exceeding performance standards. New or significantly modified routes require at least a year to mature and build ridership and will only be subject to the annual service performance evaluation after operating for a year.

## **Cost Recovery Model**

In addition to the traditional service guidelines, new service requests will be initially evaluated based on the possibility to seek 100% cost recovery for service requests. Upon a formal request for service the following application process will be followed:

- Planners develop customer needs assessment for applicant
- Evaluate options based on company location & existing service
- Present service options to applicant
- Develop contract
- Implement service
- Develop customized marketing plan – Company Branded Schedule
- Monitor and evaluate service

## **Service Monitoring & Evaluation Timeline**

Transit service evaluation is ongoing and continuous. The following evaluation process timeline is designed to provide direction to service planning and coordinate the process with other organizational planning, such as the budget process.

Data collection and monitoring - Continuous  
June –August - Performance Evaluation  
October - Annual Performance Report

## **FTA Title VI Adherence**

Metro’s planning process is sensitive to the needs of minority communities. As a federally funded transit provider, through the Federal Transit Administration. Metro has a responsibility to adhere to the objectives of Title VI of the Civil Rights Act of 1964. The objectives of the FTA Title VI program are as follows:

- To ensure FTA-assisted benefits and related services are equitably distributed without regard to race, color or national origin.
- To ensure that both the level and quality of transit services provide equal access and mobility for any person without regard to race, color or national origin.
- To ensure that access to the planning and decision-making process is open and without regard to race, color or national origin
- To ensure that decisions on the location of transit facilities and services are made without regard to race, color or national origin.

These objectives are the basis for the implementation of the FTA Title VI program. To comply with these objectives, Metro has adopted the suggested methodology and framework set forth in the Title VI reporting guidelines (FTA Circular 4702.1, Chapter IV) for compliance assessment.

By using this methodology, Metro will monitor and compare performance of all its routes based on level of service and quality of service criteria. To facilitate this evaluation, Metro will continue to collect data relating to its service standards, such as load factor, vehicle assignment, frequency, and on time performance. These analyses will be conducted on a route-by-route basis, thus enabling a system-wide evaluation. The findings of these analyses will be used to modify service delivery, to bring it in line with the stated objectives of the Title VI program, where a variance exists. Metro has submitted a report to FTA which documented the results of this methodology and showed Metro’s compliance with the Title VI regulations. The FTA approved the current Title VI program on November 14, 2012.

## **Transit Amenities:**

The NFTA does not have the authority to site transit amenities such as benches and trash receptacles on property other than their own. It is the practice of NFTA to put such amenities at stops where shelters are located. NFTA’s Bus Shelter Placement Policy, adopted in 2008 is included. In addition to amenities at bus shelters, NFTA places benches and trash receptacles at each rail station, both under and above ground. Underground rail stations have escalators and an elevator.

## **NFTA Bus Shelter Placement Policy**

Metro's bus stops and shelters are a first point of sale for our service and enhancing customers' overall transportation experience is a focal point for increasing ridership. Also, a major concern of all Metro customers, especially during inclement weather, is the amount of time spent at the bus stop exposed to the elements.

The following revised Metro bus shelter placement policy was adopted by the NFTA Board of Commissioners in March, 2007.

### **Former Shelter Placement Standard:**

- NFTA's Service Standards specified that stops with 100 or more boarding and/or transferring passengers per day qualified for placement of a bus shelter. In Niagara County and at hospitals, 50 boarding and/or transferring passengers were required. The number of passenger boarding was the primary criteria.
- NFTA currently has in place and maintains 250 shelters in our service area.

### **Goals of Revised Shelter Placement Policy:**

- Locate bus shelters based on need and relevance.
- Provide additional bus shelters through a revised placement policy as well as public and private partnerships.
- Implement bench placement programs.
- Provide enhanced customer information, including context maps and schedule information at high usage stops.
- Provide additional bus stop amenities through creative initiatives involving shelter companies, colleges/universities, municipalities, adjacent institutions, hospitals and "adopt-a-stop" participants.

### **Revised to Shelter Placement Policy:**

- The policy for placement of shelters is as follows:
- A point system based on need and relevance is outlined below, whereby the total number of points accumulated at a bus stop will determine whether a shelter is warranted.
- Bus stops that accumulate 10 points or more may be considered for a shelter placement.
- Points are accumulated according to the following criteria:

15 points          Number of daily boardings is at least 200 per day.

10 points	Number of daily boardings is between 100-199 per day.
7 points	Number of daily boardings is between 50-99 per day.
4 points	Number of daily boardings is between 10-49 per day.
4 points	Transfer point – Where passengers wait to board one bus after alighting from another.
4 points	Special needs – Area included facilities or people with special requirements for shelter that might not qualify for attention based on boarding counts (medical offices, senior citizen centers/housing, libraries, and persons with disabilities).
4 points	Activity locations – Included locations with high density of people and high potential for ridership (retail centers, hospitals, schools, apartments, office buildings).
3 points	Exposure to elements – Locations with no landscaping or buildings to offer shade/weather protection, no area to stand outside of sidewalk, and 2-3 lanes of traffic of 40 mph or more.
2 points	Long waiting time – Stops at which customers wait 30 minutes or more in between buses.
2 points	Distribution of improvements – Spread of shelters equitably throughout service area in compliance with FTA Environmental Justice requirements.
1 point	Request for improvement – Customer or community requests for improvements at stop.

- The number of daily boardings should dictate the size of the shelter and all stops with shelters also qualify for a bench.
- Additional passenger amenities, such as schedule information and lighting, will also be considered as part of the installation process.
- NFTA Engineering will prepare a proposed site plan for warranted locations, which will be forwarded to the appropriate municipality or property owner for review and approval.
- Staff will aggressively pursue additional opportunities to include the placement of bus shelters at warranted locations as part of state, county and municipal highway/road construction, reconstruction, or streetscape projects, as well as through partnerships with developers of private development projects.

- Staff will also implement an Adopt-a-Stop program, based on the successful WMATA model. This program will involve volunteer community/neighborhood groups, individuals or businesses removing trash around the bus stop and shelter area and reporting damage, vandalism or signs of criminal behavior to the NFTA. Cleaning and maintenance of the shelter structure will be performed by NFTA and/or NFTA's advertising contractor as appropriate.

# Chapter 10: Collect and Report Demographic Data

***Requirement:*** Title 49 CFR Section 21.9(b) requires recipients to keep records and submit compliance reports (a Title VI Program) to FTA. Title VI Programs shall contain “such information, as the Secretary may determine to be necessary to enable him to ascertain whether the recipient has complied or is complying with this part.” In addition, 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.” In order to ensure compliance with the regulation, FTA requires these transit providers to prepare data regarding demographic and service profile maps and charts as well as customer demographics and travel patterns.

**Response:**

## **A. Demographic and Service Profile Maps and Charts**

The most recent American Community Survey (ACS) data from 2012-2016 was used as a basis for this section. In the “Requirement to Monitor Transit Service” section of the FTA Circular, there is a requirement to classify transit routes as minority routes based on their geographic relationship to “census block, census block group, or traffic analysis zones” where the percentage minority population exceeds the percentage minority population in the service area. To comply with this requirement, every map in Chapters 10 and 11 will display census block group-level data. All demographic data in this section was analyzed and mapped using ESRI ArcGIS 10.2.

Included in this section are four (4) maps as outlined in FTA C 4702.1B Chap. IV-8:

- (1) “A **base map** of the transit provider’s service area that overlays Census tract, Census block or block group, traffic analysis zone (TAZ), or other locally available geographic data with transit facilities—including transit routes, fixed guideway alignments, transit stops and stations, depots, maintenance and garage facilities, and administrative buildings—as well as major activity centers or transit trip generators, and major streets and highways. Major activity centers and transit trip generators can include, but are not necessarily limited to, the central business district, outlying high employment areas, schools, and hospitals.”
- (2) A map that “highlights those transit facilities that were recently replaced, improved or are scheduled (projects identified in planning documents) for an update in the next five years.”
- (3) “A **demographic map** that plots the information listed in (1) above and also shades those Census tracts, blocks, block groups, TAZs, or other geographic zones 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.”
- (4) A **demographic map** that “depicts those Census tracts, blocks, block groups, TAZs, or other geographic zones 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.”

## **Definitions**

NFTA Service Area – based on the FTA definition of service area, *“the geographic area in which a transit agency is authorized by its charter to provide service to the public,”* the service area for NFTA is the entirety of Niagara and Erie Counties. When considering average percentages for service area demographics, all census block groups in these two counties are therefore included.

## **Methodologies**

### Minority Population

Using the Table “Race” (ID B02001), from the American Community Survey (ACS), minority population by census block group was determined by taking the total population of the census block group and subtracting the “White Alone” population. The remaining population, including “Black or African American alone”, “American Indian and Alaska Native Alone”, “Asian alone”, “Native Hawaiian and Other Pacific Islander alone”, “Some other race alone”, and “Two or more races”, was considered the minority population of the census block group. By calculating the percentage of minority population for each census block group and averaging those percentages, the average minority percentage for the service area was found to be 24.3%. Any census block groups with a minority percentage of 24.3% and above were considered minority census block groups, and any census block groups below 24.3% were not considered minority census block groups.

### Low-Income Population

FTA Circular 4702.1B defines a low-income person as *“a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines.”* The Census measurement of poverty level is similar to the HHS poverty guidelines in that it sets a median household income threshold that varies based on family size, and does not vary geographically across the contiguous United States. Since American Community Survey individual and household incomes are in ranges that do not coincide with HHS poverty guideline income thresholds, the Census poverty level thresholds are used for determining low-income population in the NFTA service area.

Using the Table “Poverty Status in the Past 12 Months by Household Type by Age of Householder” (ID B17017), low-income population percentage by census block group was determined by the proportion of households in the census block group where “income in the past 12 months is below poverty level” to the total number of households in the census block group. After averaging the percentages of all census block groups in the service area, the average percentage of low-income households in the service area was found to be 16.8%. Any census block groups with a low-income percentage of 16.8% and above were considered minority census block groups, and any census block groups below 16.8% were not considered low-income census block groups.

Figure 13 - NFTA Service Area Base Map

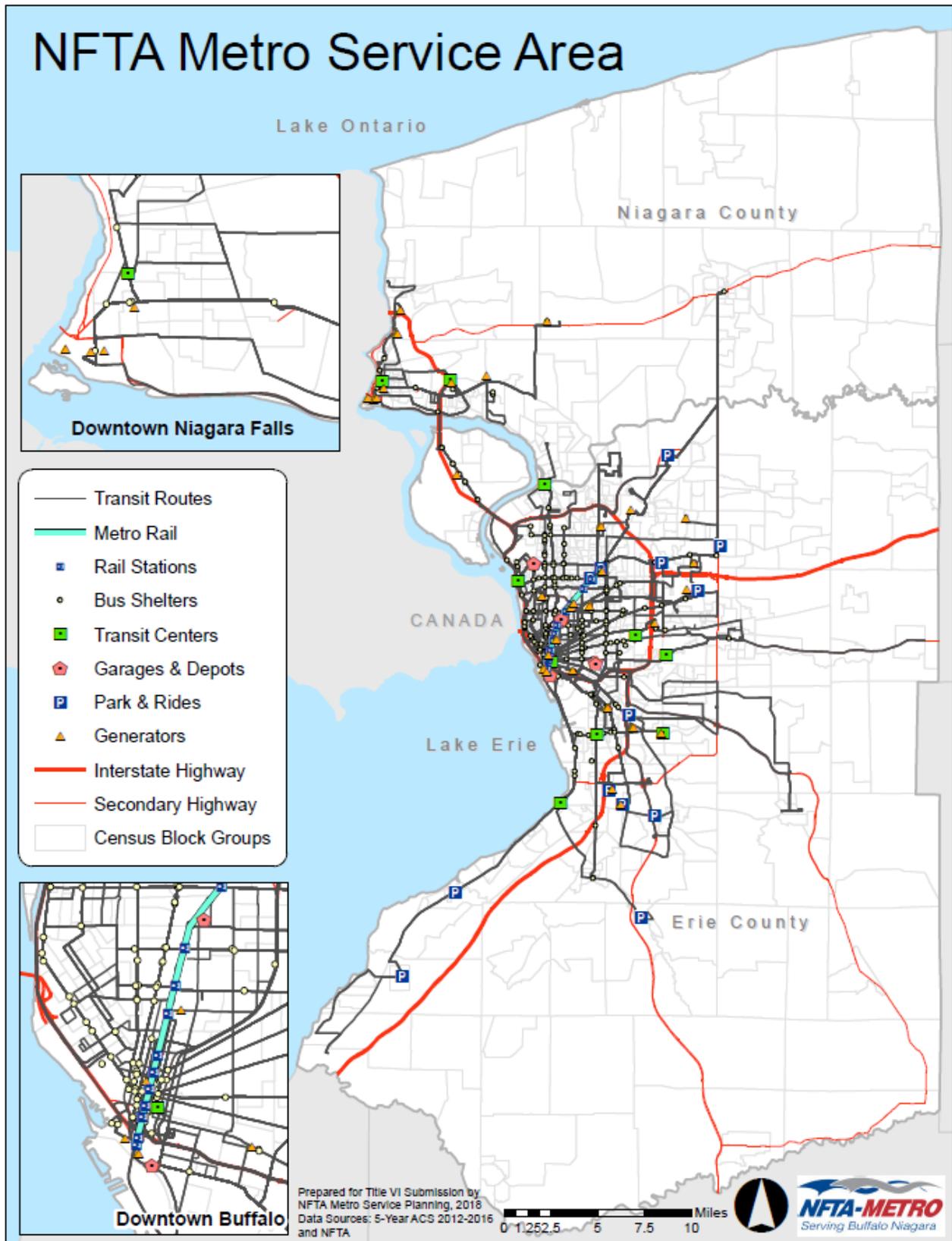


Figure 14 - NFTA New/Improved Transit Facilities, September 2015 to Present and Scheduled Improvements

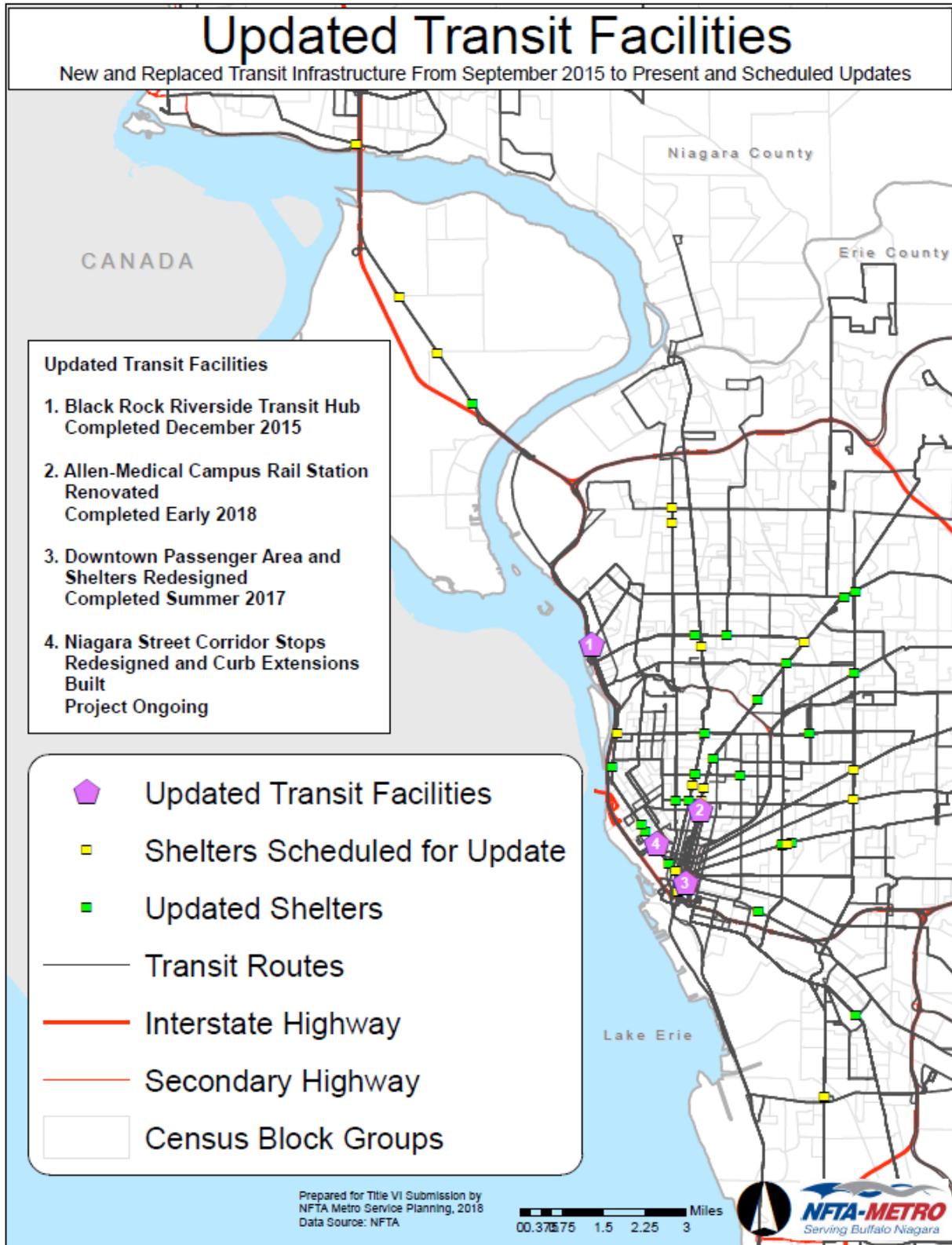


Figure 15 - Minority Census Block Groups and Transit Facilities

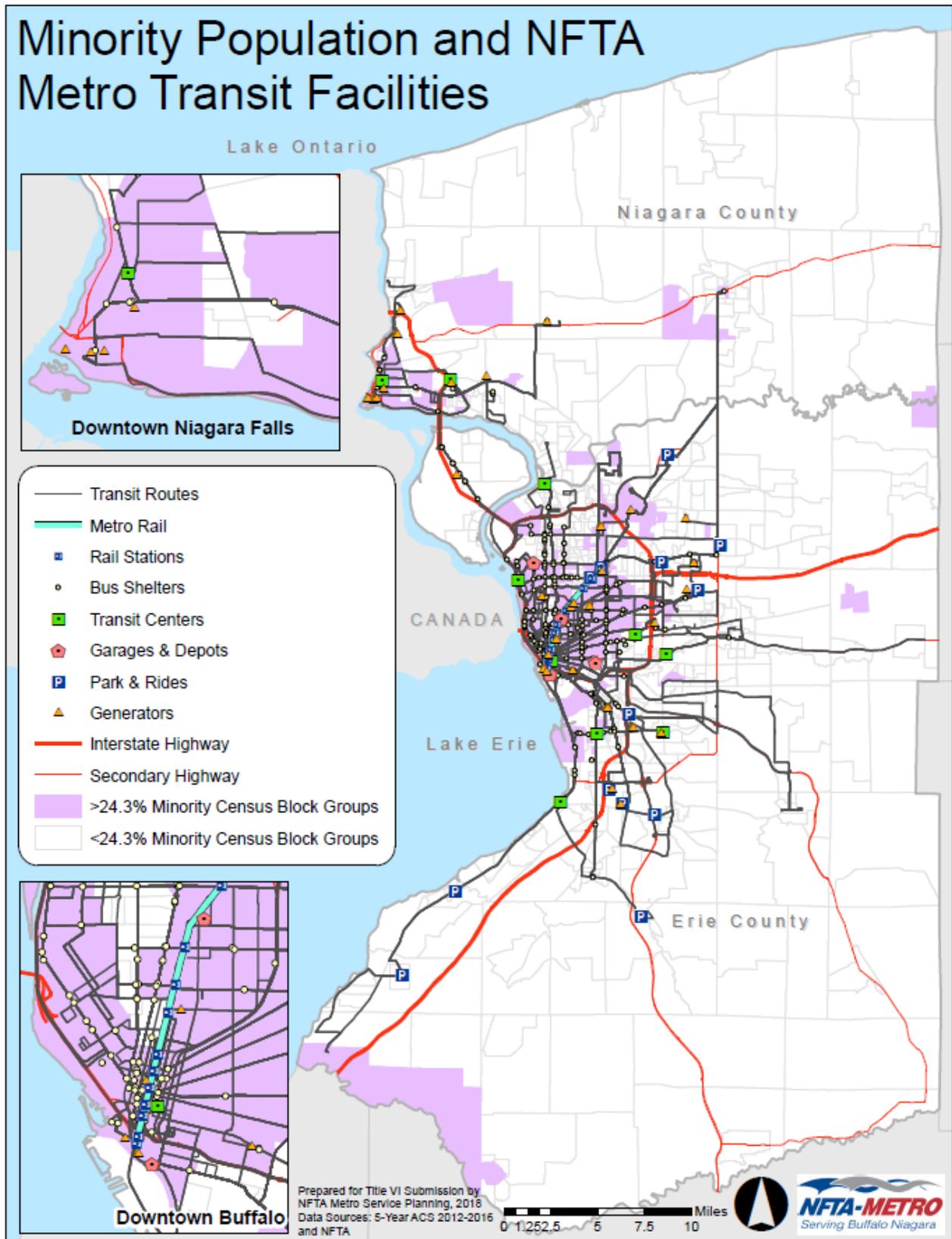
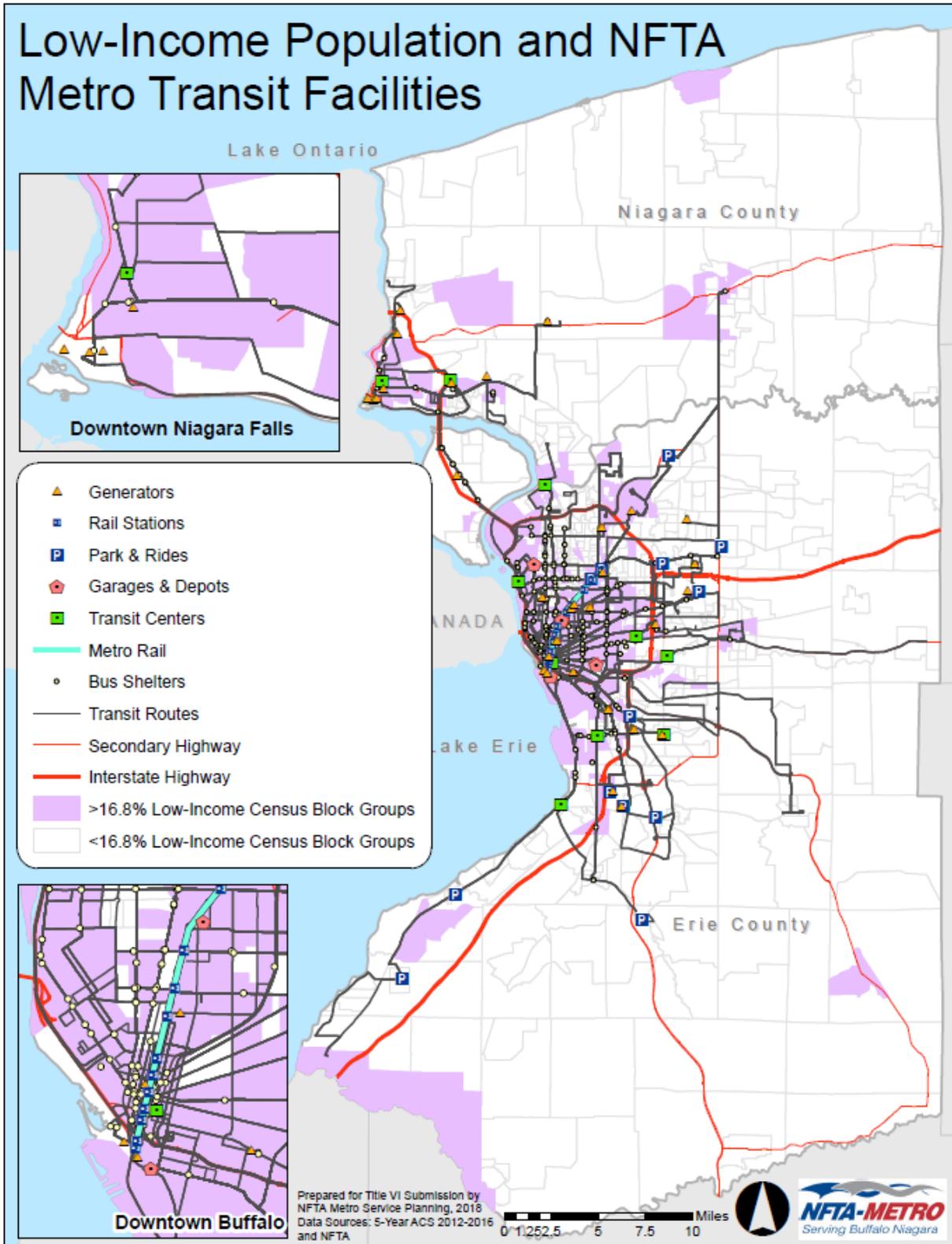


Figure 16 - Low-Income Census Block Groups and Transit Facilities, Amenities, and Routes



## **B. Demographic Ridership and Travel Patterns**

**Requirement: Transit 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. (FTA C 4702.1B Chap. IV-8)**

In 2017, the Greater Buffalo-Niagara Transportation Council (GBNRTC) retained Moore & Associates to conduct an origin/destination study of fixed-route and rail riders within the Niagara Frontier Transportation Authority (NFTA) service area. The survey was designed to gather primary data regarding:

- Origin and destination;
- Boarding and alighting;
- Trip Purpose;
- Method of accessing transit stop;
- Travel distance to/from bus stop;
- **Customer demographics;** and
- Customer fare payment methods.

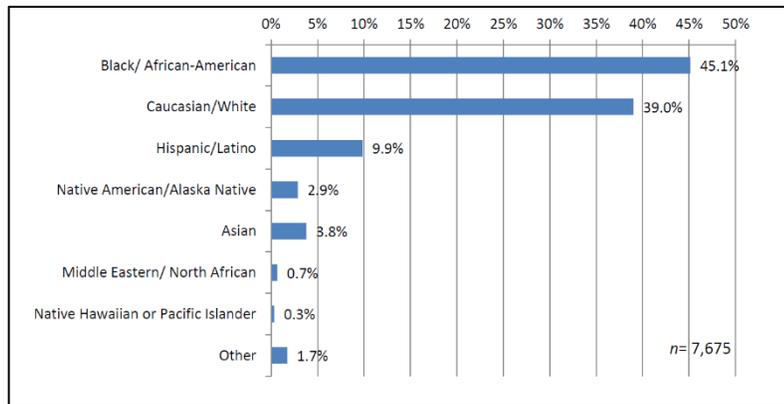
Demographic information surveyed included age, race, household size, employment status, languages spoken at home, English language proficiency, and total household income. The on-board surveys were printed and administered in English and four non-English languages present in the NFTA service area – Spanish, Arabic, Burmese, and Karen. This satisfies the FTA requirement to *“take steps to translate customer surveys into languages other than English as necessary, or to provide translation services in the course of conducting customer surveys consistent with the DOT LEP guidance and the recipient’s language assistance plan (Chap. IV-9).”* These surveys were also available online in all five languages. There were 9,697 respondents to the survey, and the sample reflected a statistical accuracy of 95 percent and a +/-1 percent margin of error at the system level.

### **Minority Travel Patterns**

*“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” (FTA C 4702.1B Chap. IV-8)*

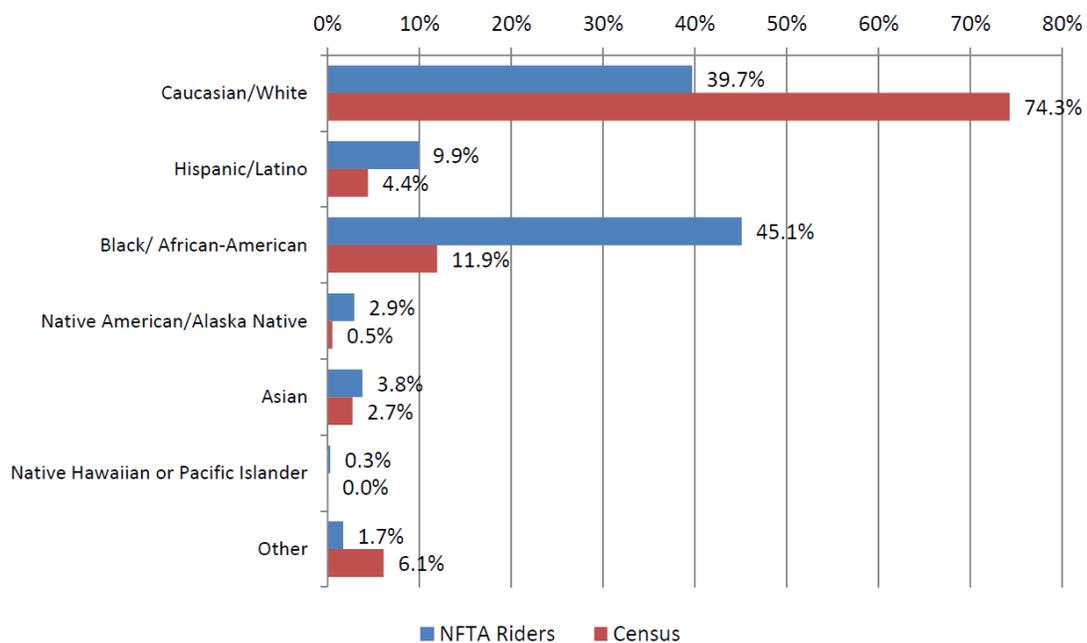
Nearly half of respondents were Black/African-American, while more than a third were Caucasian/White, and ten percent were Hispanic/Latino. In total, minorities make up 61 percent of NFTA riders.

Figure 17 - Survey Respondents



The following graph highlights service area demographics from Census data in comparison to the NFTA rider demographic profile. While making up three quarters of the service area’s population, only a third of riders are Caucasian/White. Conversely, while almost half of NFTA riders are Black/African-American, they make up only 12 percent of the service area’s population. Hispanic/Latino, Asian, and Native American/Alaska Native populations are also more highly represented among NFTA riders than in the total service area population. This information is also included in tabular format on this page to comply with the requirement “The demographic information shall be displayed in tabular format” (Chap. IV-9).

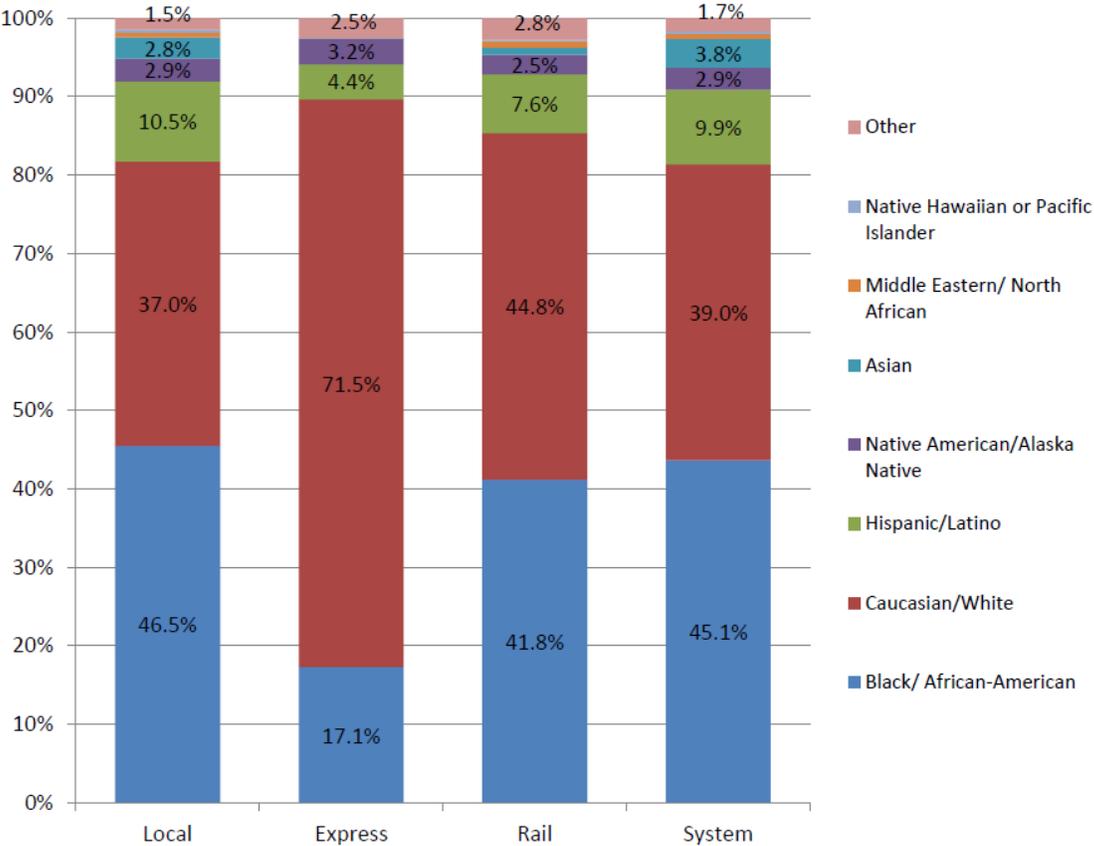
Figure 18 - Demographic Comparison



Ethnicity	Percent of Total Riders	Percent of Service Area Population
Black/African-American	45.1%	11.9%
Caucasian/White	39.0%	74.3%
Hispanic/Latino	9.9%	4.4%
Asian	3.8%	2.7%
Native American/Alaskan Native	2.9%	0.5%
Other	1.7%	6.1%
Middle Eastern/North African	0.7%	included within Caucasian/White by consultant to enable comparisons with Census data
Native Hawaiian/Pacific Islander	0.3%	0.0%

The graph and table below highlight transit modes taken by riders of different ethnicities. Local bus routes are the most common mode taken by minorities, while express bus routes are the most common mode for non-minorities. Of local bus riders, 63% self-identified with a minority ethnicity. Minority respondents made up 55.2% of all rail riders surveyed. Most of the respondents on express bus routes were White/Caucasian at 71.5%, with only 28.5% minority respondents.

Figure 19 - Mode by Ethnicity



<b>Ethnicity</b>	<b>Percent of Local Bus respondents</b>	<b>Percent of Express Bus respondents</b>	<b>Percent of Rail respondents</b>
Black/African-American	46.5%	17.1%	41.8%
Caucasian/White	37.0%	71.5%	44.8%
Hispanic/Latino	10.5%	4.4%	7.6%
Asian	2.8%	0.0%	<1%
Native American/Alaskan Native	2.9%	3.2%	<1%
Other	1.5%	2.5%	2.8%
Middle Eastern/North African	<1%	<1%	<1%
Native Hawaiian/Pacific Islander	<1%	<1%	<1%

The table below shows ridership by ethnicity by NFTA route, excluding school and seasonal routes. It further highlights the high minority ridership on local routes (routes 1 through 55), and high non-minority ridership on express routes (routes 60 through 204). The routes with the highest minority ridership are local routes 18-Jefferson (91.2%), and 29-Wohlers (100%). The routes with the lowest minority ridership are express routes 60-Niagara Falls (12.5%) and 76-Lotus Bay (13.3%).

Figure 20 - Ethnicity by Route

Route	Caucasian/ White	Black/ African- American	Hispanic/ Latino	Asian	Middle Eastern/ North African	Native American/ Alaska Native	Native Hawaiian or Pacific Islander	Other
1	44.4%	42.9%	5.3%	3.0%	0.8%	3.0%	0.0%	0.8%
2	54.5%	28.5%	10.9%	0.6%	0.0%	2.4%	0.6%	2.4%
3	34.6%	34.6%	22.1%	2.8%	0.9%	4.0%	0.0%	0.9%
4	33.7%	51.7%	9.3%	1.7%	0.0%	1.2%	1.7%	0.6%
5	36.9%	36.5%	17.6%	3.6%	0.6%	2.2%	0.5%	2.2%
6	28.6%	56.0%	8.6%	2.3%	1.1%	1.9%	0.0%	1.5%
7	60.0%	20.0%	8.6%	0.0%	0.0%	8.6%	0.0%	2.9%
8	26.9%	60.2%	5.9%	1.6%	0.5%	2.2%	0.0%	2.7%
11	55.2%	27.6%	9.5%	3.8%	0.0%	3.8%	0.0%	0.0%
12	14.7%	64.8%	12.1%	3.0%	0.6%	3.0%	0.4%	1.3%
13	11.1%	77.5%	4.1%	2.2%	0.7%	2.6%	0.4%	1.5%
14	54.0%	31.6%	10.9%	0.6%	0.0%	2.3%	0.0%	0.6%
15	60.9%	21.0%	10.1%	0.8%	1.7%	3.4%	1.3%	0.8%
16	63.0%	22.5%	8.7%	1.2%	0.6%	2.3%	0.0%	1.7%
18	8.8%	85.3%	2.9%	2.9%	0.0%	0.0%	0.0%	0.0%
19	27.5%	58.1%	6.2%	2.0%	0.7%	2.7%	0.5%	2.2%
20	45.4%	31.3%	11.5%	4.8%	0.9%	4.4%	0.5%	1.2%
22	28.6%	57.1%	7.1%	2.4%	2.4%	2.4%	0.0%	0.0%
23	29.1%	56.0%	9.2%	2.2%	0.0%	2.2%	0.6%	0.6%
24	21.5%	65.8%	7.2%	1.7%	0.4%	2.1%	1.3%	0.0%
25	51.2%	31.2%	8.8%	2.4%	0.0%	4.1%	0.0%	2.4%
26	19.6%	73.9%	4.3%	0.7%	0.0%	0.7%	0.0%	0.7%
29	0.0%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
32	32.6%	52.3%	9.3%	1.7%	0.0%	3.5%	0.0%	0.6%
34	34.6%	43.9%	8.4%	1.9%	0.9%	5.6%	0.0%	4.7%
35	54.4%	30.9%	10.3%	1.5%	1.5%	0.0%	0.0%	1.5%
36	45.3%	35.8%	7.5%	1.9%	3.8%	5.7%	0.0%	0.0%
40	45.1%	35.4%	6.3%	5.6%	0.0%	4.2%	0.0%	3.5%
42	52.0%	36.0%	8.0%	0.0%	4.0%	0.0%	0.0%	0.0%
44	43.8%	38.8%	5.0%	6.3%	1.3%	2.5%	0.0%	2.5%
46	47.2%	33.3%	8.3%	8.3%	0.0%	0.0%	0.0%	2.8%
47	42.9%	44.9%	4.1%	4.1%	0.0%	4.1%	0.0%	0.0%
48	42.0%	44.4%	3.7%	4.9%	0.0%	3.7%	0.0%	1.2%
49	30.0%	45.0%	5.0%	5.0%	10.0%	0.0%	0.0%	5.0%
50	30.3%	36.4%	15.2%	12.1%	0.0%	3.0%	0.0%	3.0%
52	35.5%	51.6%	6.5%	0.0%	0.0%	0.0%	3.2%	3.2%
54	50.0%	37.5%	0.0%	0.0%	0.0%	12.5%	0.0%	0.0%
55	42.2%	40.0%	5.6%	7.8%	0.0%	3.3%	0.0%	1.1%
60	87.5%	12.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
61	83.3%	0.0%	0.0%	0.0%	0.0%	16.7%	0.0%	0.0%
64	83.3%	5.6%	5.6%	5.6%	0.0%	0.0%	0.0%	0.0%
66	50.0%	11.1%	5.6%	16.7%	0.0%	0.0%	0.0%	16.7%
67	57.1%	42.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
68	85.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	14.3%
69	73.3%	26.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
70	83.3%	16.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
72	80.0%	20.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
74	76.2%	14.3%	4.8%	0.0%	0.0%	4.8%	0.0%	0.0%
75	50.0%	28.6%	14.3%	7.1%	0.0%	0.0%	0.0%	0.0%
76	86.7%	0.0%	0.0%	0.0%	0.0%	13.3%	0.0%	0.0%
79	83.3%	16.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
81	14.3%	71.4%	14.3%	0.0%	0.0%	0.0%	0.0%	0.0%
204	55.6%	11.1%	11.1%	11.1%	0.0%	11.1%	0.0%	0.0%
Rail	42.7%	39.8%	7.2%	4.2%	0.8%	2.3%	0.2%	2.6%

**Fare Usage by Ethnicity and Low-Income Population**

*“Demographic information shall also be collected on fare usage by fare type amongst minority users and low-income users, in order to assist with fare equity analyses” (FTA C 4702.1B Chap. IV-8-9)*

**Fare Usage by Ethnicity**

Bus

The data below represents all riders who gave responses to fare type and ethnicity. The fare categories used most by minorities are tokens (71.5%), weekly passes (71.8%) and student passes (72.8%). The fare categories used least by minorities are cash (61.1%) and day passes (64.8%). Largely, the distribution of fare category usage by ethnicity closely follows the distribution of ridership by ethnicity for the system.

*Figure 21 - Bus Fare Usage by Ethnicity*

Ethnicity	Token	Cash (one ride)	Day Pass	Weekly Pass	Monthly Pass	30-Day Pass	Student Pass	CRAM Pass	Percent Total Riders
Black/African American	50.4%	40.4%	48.1%	56.4%	42.9%	47.1%	49.8%	45.0%	45.1%
Caucasian/White	28.5%	38.9%	35.2%	28.2%	41.5%	32.6%	27.2%	33.8%	39.0%
Hispanic/Latino	8.0%	12.3%	9.8%	7.3%	8.6%	10.5%	11.5%	11.0%	9.9%
Asian	3.6%	3.5%	1.6%	0.0%	1.7%	5.2%	7.0%	4.3%	3.8%
Native American/Alaskan Native	3.6%	2.7%	2.6%	4.5%	2.9%	2.9%	2.4%	4.5%	2.9%
Other	2.2%	1.1%	1.8%	2.7%	1.6%	0.6%	1.2%	1.2%	1.7%
Middle Eastern/North African	2.9%	0.5%	0.6%	0.9%	0.5%	1.2%	0.7%	0.2%	0.7%
Native Hawaiian/Pacific Islander	0.7%	0.6%	0.3%	0.0%	0.3%	0.0%	0.2%	0.0%	0.3%

## Rail

Unlike bus fare category usage, rail fare category usage does not closely follow the system distribution of riders by ethnicity. The majority of cash, round trip rail ticket, and NFTA Employee pass users are non-minority. A large majority of token, 30-day pass, and student pass users on the rail are minority riders

Figure 22 - Rail Fare Usage by Ethnicity

Ethnicity	Token	Cash (one ride)	Day Pass	Weekly Pass	Monthly Pass	30-Day Pass	Round Trip Rail Ticket	Student Pass	Free Fare Zone	NFTA Employee Pass	Percent Total Riders
Black/African American	72.4%	25.9%	49.6%	63.6%	38.5%	58.6%	18.3%	62.6%	42.7%	20.0%	45.1%
Caucasian/White	13.8%	54.5%	32.0%	22.7%	45.8%	13.8%	64.6%	18.2%	38.7%	57.3%	39.0%
Hispanic/Latino	3.4%	8.6%	6.6%	9.1%	5.9%	17.2%	8.5%	9.1%	6.7%	9.3%	9.9%
Asian	6.9%	5.5%	4.3%	0.0%	3.2%	3.4%	3.7%	4.0%	5.3%	9.3%	3.8%
Native American/Alaskan Native	0.0%	2.7%	3.9%	4.5%	2.7%	0.0%	1.2%	2.0%	0.0%	0.0%	2.9%
Other	0.0%	2.7%	2.7%	0.0%	2.5%	6.9%	2.4%	4.0%	5.3%	2.7%	1.7%
Middle Eastern/North African	3.4%	0.0%	0.4%	0.0%	0.9%	0.0%	1.2%	0.0%	1.3%	1.3%	0.7%
Native Hawaiian/Pacific Islander	0.0%	0.0%	0.4%	0.0%	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%

## **Fare Usage by Income**

### Bus

Bus fare type is mostly similar among all income brackets. The lowest and highest income brackets are the highest users of tokens, while there is a slightly higher percentage of high-income riders that use on-board cash payment.

Figure 23 - Bus Fare by Income

Income	Token	Cash (one ride)	Day Pass	Weekly Pass	Monthly Pass	30-Day Pass	Student Pass	CRAM Pass
Less than \$5,000	3.8%	19.8%	26.0%	1.8%	36.0%	2.8%	4.1%	5.8%
\$5,000 - \$9,999	2.0%	21.2%	26.9%	1.5%	32.6%	1.8%	5.4%	8.5%
\$10,000 - \$14,999	1.4%	21.8%	27.2%	1.5%	35.5%	4.3%	3.9%	4.4%
\$15,000 - \$24,999	1.0%	19.8%	32.2%	2.1%	34.8%	2.3%	3.3%	4.6%
\$25,000 - \$34,999	1.6%	25.5%	27.3%	2.9%	32.1%	2.3%	3.9%	4.5%
\$35,000 - \$49,999	1.7%	25.5%	29.1%	2.2%	30.3%	3.9%	2.0%	5.3%
\$50,000 - \$74,999	1.9%	24.2%	29.2%	1.1%	33.0%	1.9%	1.9%	6.8%
\$75,000 - \$99,999	1.0%	31.4%	22.9%	1.9%	28.6%	2.9%	4.8%	6.7%
\$100,000 or more	6.3%	36.5%	11.1%	1.6%	34.9%	4.8%	0.0%	4.8%

## Rail

Similar to bus, low-income rail riders are among the highest users of tokens. High-income riders use more round-trip rail tickets than low-income riders.

Figure 24 - Rail Fare by Income

Income	Token	Cash (one ride)	Day Pass	Weekly Pass	Monthly Pass	30-Day Pass	Round Trip Rail Ticket	Student Pass	Free Fare Zone	NFTA Employee Pass
Less than \$5,000	5.9%	17.1%	15.5%	1.1%	36.4%	4.8%	2.1%	6.4%	8.0%	2.7%
\$5,000 - \$9,999	2.4%	15.7%	16.9%	1.2%	48.2%	2.4%	2.4%	2.4%	6.0%	2.4%
\$10,000 - \$14,999	2.2%	8.8%	34.1%	1.1%	35.2%	7.7%	3.3%	2.2%	3.3%	2.2%
\$15,000 - \$24,999	0.8%	17.4%	26.4%	2.5%	33.1%	4.1%	5.0%	2.5%	5.8%	2.5%
\$25,000 - \$34,999	0.0%	17.6%	25.2%	4.2%	29.4%	0.8%	5.9%	3.4%	5.9%	7.6%
\$35,000 - \$49,999	2.0%	20.0%	23.0%	1.0%	28.0%	3.0%	9.0%	5.0%	4.0%	5.0%
\$50,000 - \$74,999	0.0%	18.9%	15.3%	0.9%	36.9%	5.4%	6.3%	7.2%	0.9%	8.1%
\$75,000 - \$99,999	3.8%	15.4%	9.6%	0.0%	25.0%	9.6%	11.5%	3.8%	7.7%	13.5%
\$100,000 or more	2.9%	21.7%	10.1%	0.0%	34.8%	0.0%	13.0%	2.9%	2.9%	11.6%

# Chapter 11: Monitor Transit Service

***Requirement:*** Recipients must develop and implement procedures to monitor the level and quality of service provided to the minority community, against overall system averages. At a minimum, recipients must conduct periodic compliance assessments to determine whether the transit service provided to minority communities and minority users are consistent with Title VI objectives.

***Transit providers shall use the minority transit route definition to implement this monitoring program. Transit providers shall select a sample of minority and nonminority routes from all modes of service provided, e.g., local bus, bus rapid transit, light rail, etc. The sample shall include routes that provide service to predominantly minority areas and non-minority areas.***

## **Response:**

NFTA monitors the level and quality of the service provided to the minority community against overall system averages on an annual basis as part of the annual performance review. We identify routes that are predominately minority and monitor against service standards for disparities of service from non-minority routes. The results reveal that service is delivered with no disparate impact to minority communities.

## **Methodology**

As defined in Chapter I of the Title VI Circular, a minority transit route is “one in which at least one-third of the revenue miles are located in a Census block, Census block group, or traffic analysis zone where the percentage minority population exceeds the percentage minority population in the service area.”

Using GIS, a map was created that displays Census block groups in which the minority percentage exceeds the service area average. The average minority percentage - the percentage of population that is not classified as “White Alone” - of all 955 census block groups in the NFTA Metro service area was 24.3%. The total number of Census block groups that exceed the average minority population percentage is 297.

A GIS model was then created that calculated the percentage of revenue miles that fall within these census block groups for each route in the system. Any route whose percentage of revenue miles in minority census block groups exceeds 1/3 (33.3%) was given a minority route designation, with some exceptions. The table on the following page shows the percentage of revenue miles within minority census block groups for each route, and the reasoning for the exclusion of a route that exceeds the 1/3 threshold. Most of the routes excluded are express routes for which the majority of revenue miles within minority census block groups run on highways with no stops. Of the 63 routes in the NFTA Metro system, 38 routes (60%) are minority routes based on the definition above.

On the following two pages are maps showing minority routes in the City of Buffalo and City of Niagara Falls respectively, as well as minority census blocks in each region. The City of Lockport was excluded, since there are no minority routes that serve it.

Figure 25- Route Status

Route Number	Route Name	Percent of Revenue Miles in Minority Census Block Groups	Route Type	Route Designation Explanation
206	Buffalo State	97.7%	Minority Route	
81	East Side	97.2%	Minority Route	
145	Metro Rail	96.2%	Minority Route	
13	Kensington	94.9%	Minority Route	
12	Utica	94.8%	Minority Route	
8	Main	93.5%	Minority Route	
29	Wohlers	93.2%	Minority Route	
112	Grant-North	88.2%	Minority Route	
3	Grant	86.1%	Minority Route	
18	Jefferson	82.2%	Minority Route	
5	Niagara	78.7%	Minority Route	
204	Airport-Downtown	76.4%	Non-Minority Route	Airport-Downtown Express - few to no stops in Minority Area
22	Porter/Best	75.5%	Minority Route	
19	Bailey	74.7%	Minority Route	
26	Delavan	73.2%	Minority Route	
102	Bailey	69.7%	Minority Route	
104	So. Central	69.1%	Minority Route	
110	West-North	68.2%	Minority Route	
23	Fillmore Hertel	68.1%	Minority Route	
24	Genesee	64.0%	Minority Route	
6	Sycamore	63.9%	Minority Route	
61	N. Tonawanda	63.5%	Non-Minority Route	Suburban Express - few to no stops in Minority Area
4	Broadway	60.3%	Minority Route	
67	Cleveland Hill	59.8%	Non-Minority Route	Suburban Express - few to no stops in Minority Area
52	Hyde Park	58.1%	Minority Route	
79	Tonawanda	57.8%	Non-Minority Route	Suburban Express - few to no stops in Minority Area
40	Grand Island	56.1%	Minority Route	
68	George Urban	55.3%	Non-Minority Route	Suburban Express - few to no stops in Minority Area
111	So.-Michigan	52.7%	Minority Route	
1	William	51.4%	Minority Route	
32	Amherst	50.7%	Minority Route	
35	Sheridan	50.5%	Minority Route	
7	Baynes/Richmond	46.7%	Minority Route	
101	No.-South	45.2%	Minority Route	
34	N. Falls Blvd.	44.6%	Minority Route	
54	Military	42.9%	Minority Route	
42	Lackawanna	42.7%	Minority Route	
64	Lockport	42.4%	Non-Minority Route	Suburban Express - few to no stops in Minority Area
20	Elmwood	42.1%	Minority Route	
155	NF Trolley	40.6%	Non-Minority Route	Seasonal Service - Hotels to Downtown/Falls circulator
50	Main/Niagara	40.4%	Minority Route	
60	Niagara Falls	40.1%	Non-Minority Route	Suburban Express - few to no stops in Minority Area
66	Williamsville	40.0%	Non-Minority Route	Suburban Express - few to no stops in Minority Area
11	Colvin	39.7%	Minority Route	
15	Seneca	38.1%	Minority Route	
106	So.-Suburban	37.0%	Minority Route	
74	Boston	36.4%	Non-Minority Route	Suburban Express - few to no stops in Minority Area
25	Delaware	35.5%	Minority Route	
2	Clinton	33.0%	Non-Minority Route	< 1/3 Route in Minority Area
16	South Park	33.0%	Non-Minority Route	< 1/3 Route in Minority Area
55	Pine Avenue	29.2%	Non-Minority Route	< 1/3 Route in Minority Area
44	Lockport	22.2%	Non-Minority Route	< 1/3 Route in Minority Area
75	West Seneca	22.2%	Non-Minority Route	< 1/3 Route in Minority Area
14	Abbott	21.1%	Non-Minority Route	< 1/3 Route in Minority Area
76	Lotus Bay	19.5%	Non-Minority Route	< 1/3 Route in Minority Area
49	Millard Suburban	17.6%	Non-Minority Route	< 1/3 Route in Minority Area
69	Alden	15.5%	Non-Minority Route	< 1/3 Route in Minority Area
72	Orchard Park	10.2%	Non-Minority Route	< 1/3 Route in Minority Area
70	East Aurora	8.7%	Non-Minority Route	< 1/3 Route in Minority Area
48	Williamsville	6.1%	Non-Minority Route	< 1/3 Route in Minority Area
47	Youngs Road	5.8%	Non-Minority Route	< 1/3 Route in Minority Area
103	E.-Suburban	3.7%	Non-Minority Route	< 1/3 Route in Minority Area
46	Lancaster	0.0%	Non-Minority Route	< 1/3 Route in Minority Area

Figure 26 - Minority Bus Routes - City of Buffalo

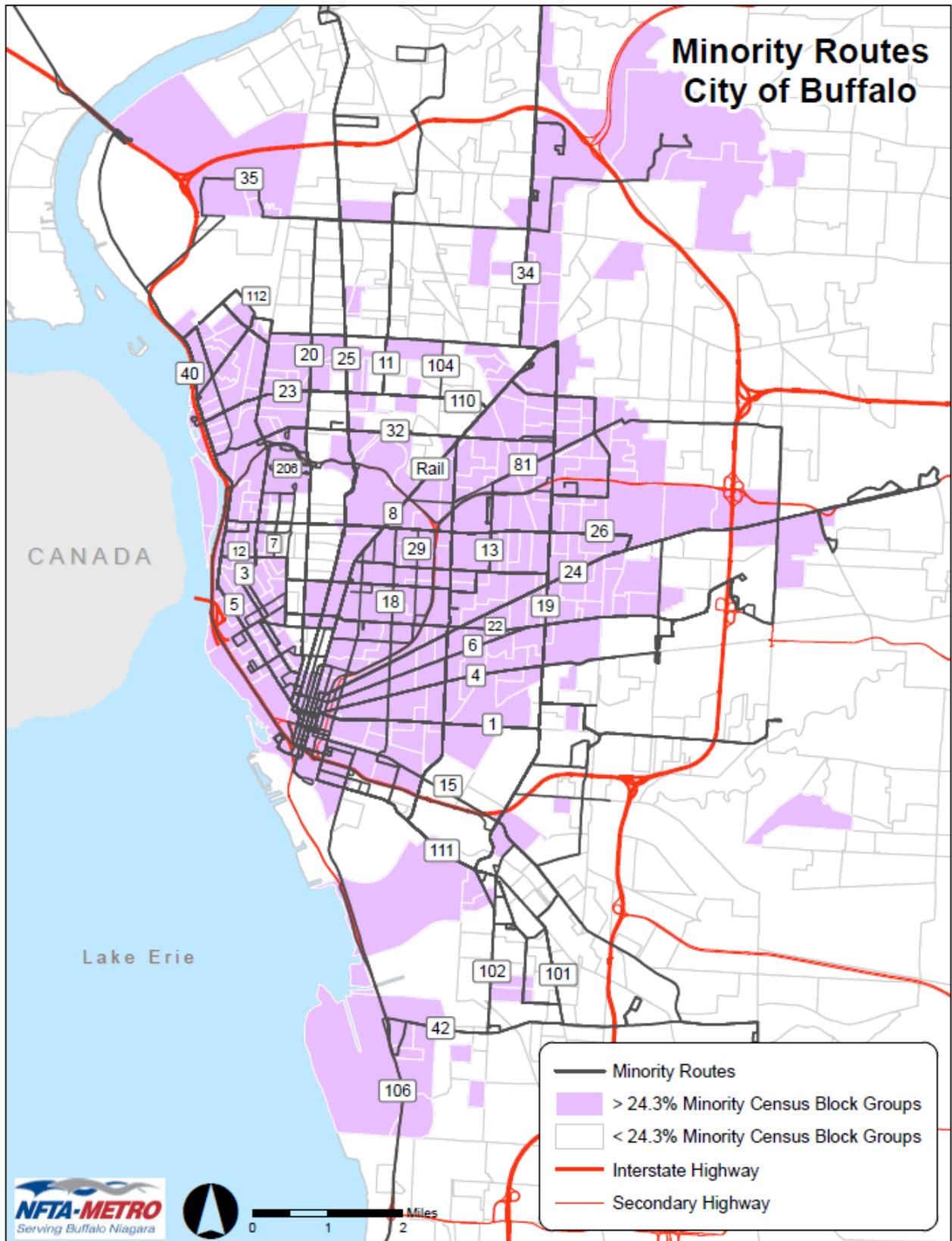
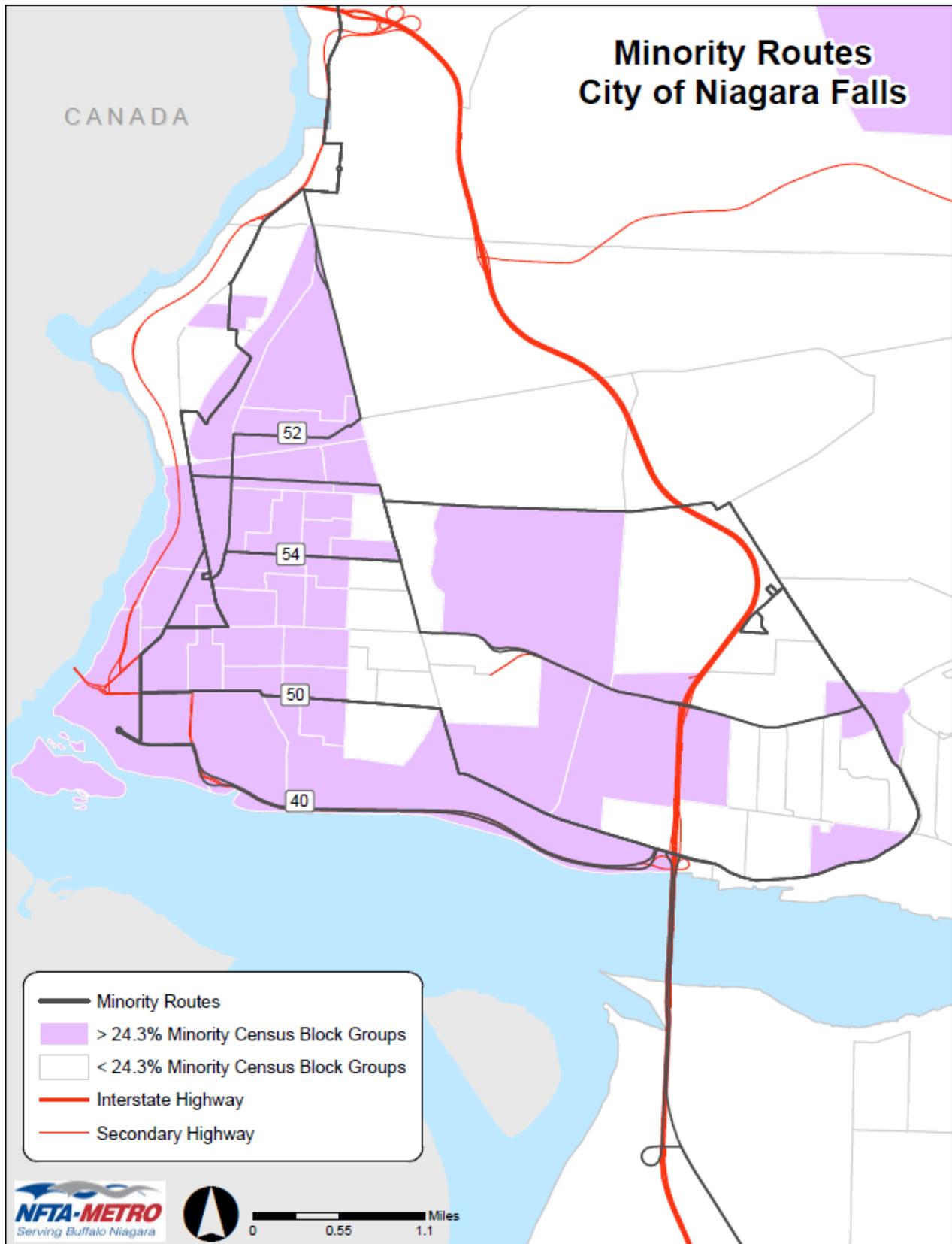


Figure 27 - Minority Routes – City of Niagara Falls



**Service Standard Performance – Minority and Non-Minority Routes**

***Requirement: Transit providers shall assess the performance of each minority and non-minority route in the sample for each of the transit provider’s service standards and service policies. Transit providers shall compare the transit service observed in the assessment to the transit provider’s established service policies and standards. For cases in which the observed service for any route exceeds or fails to meet the standard or policy, depending on the metric measured, the transit provider shall analyze why the discrepancies exist, and take steps to reduce the potential effects.***

NFTA Metro service standards are broken down by route type – Primary, Secondary, Collector Express, Limited Express, Community Circulator, and School Day Only routes (see Chapter 9 of Title VI submission). Minority routes are predominantly primary and secondary routes, and non-minority routes are largely collector express and secondary routes, which can be seen in the table below.

*Figure 28 - Route Types*

<b>Route Type</b>	<b>Minority Routes</b>		<b>Non-Minority Routes</b>	
<b>Primary (includes Rail)</b>	15	39%	1	4%
<b>Secondary</b>	14	37%	8	32%
<b>Limited Express</b>	0	0%	3	12%
<b>Collector Express</b>	1	3%	11	44%
<b>Community Circulator</b>	1	3%	1	4%
<b>School Day Only</b>	7	18%	1	4%
<b>Total</b>	38	100%	25	100%

The following sections evaluate the performance of NFTA Metro routes based each of the agency’s service standards and guidelines. Each section will begin with a chart depicting the service standard, followed by a description of the data if applicable, a table containing each route’s data for the service standard and whether it is met, and explanations and next steps for unmet standards.

## Service Coverage

Coverage refers to the geographic extent of fixed route transit service within Metro's service area. Transit systems are not able to provide transit service to every potential rider who needs or wants service as such universal service would be prohibitively expensive. Metro's service coverage guidelines prescribe transit availability based on transit demand potential along with development patterns and significant activity centers. Transit demand potential is measured by a transit orientation composite index that summarizes five key transit supportive demographic characteristics including population density, financially disadvantaged (in poverty) population, zero vehicle households, youth population and senior population for each census tract/traffic analysis zone in Metro's service area. Each census tract/traffic analysis zone is ranked as having very high, high, moderate, low or very low transit demand potential. Based on these rankings the following guidelines for service coverage should apply.

- Metro fixed route service should be available within:
  - ¼ mile of areas with high or very high transit demand potential.
  - ½ mile of areas with moderate transit demand potential.
- Areas with low or very low transit demand potential do not warrant regular fixed route service; however, limited fixed route or alternative services will be evaluated based on a demonstrated demand, the cost of providing service and the availability of resources.
- Metro will also strive to provide service within ¼ mile of significant activity centers, such as employers, health care facilities, regional retail centers, educational institutions and social service facilities.

On the following two pages are maps showing (a) transit demand potential and (b) service coverage based on buffer distances from NFTA Metro routes. The former map was prepared as part of a joint 2016 study by NFTA Metro and TMD ranking areas of Buffalo and Niagara Falls based on the demographic factors listed above. The areas with the greatest transit demand potential are the West Side, Black Rock/Riverside, and East Side neighborhoods of Buffalo, South Buffalo/Lackawanna, and the City of Niagara Falls.

The latter map shows the coverage of NFTA Metro routes based on the ¼ and ½ mile buffers outlined above, overlaid by major transit generators. Areas with high transit demand potential are extensively covered by NFTA Metro routes. Our area of coverage serves minority census blocks very well, and all major transit generators are within ¼ mile of our routes.

Figure 29 - Transit Demand Potential

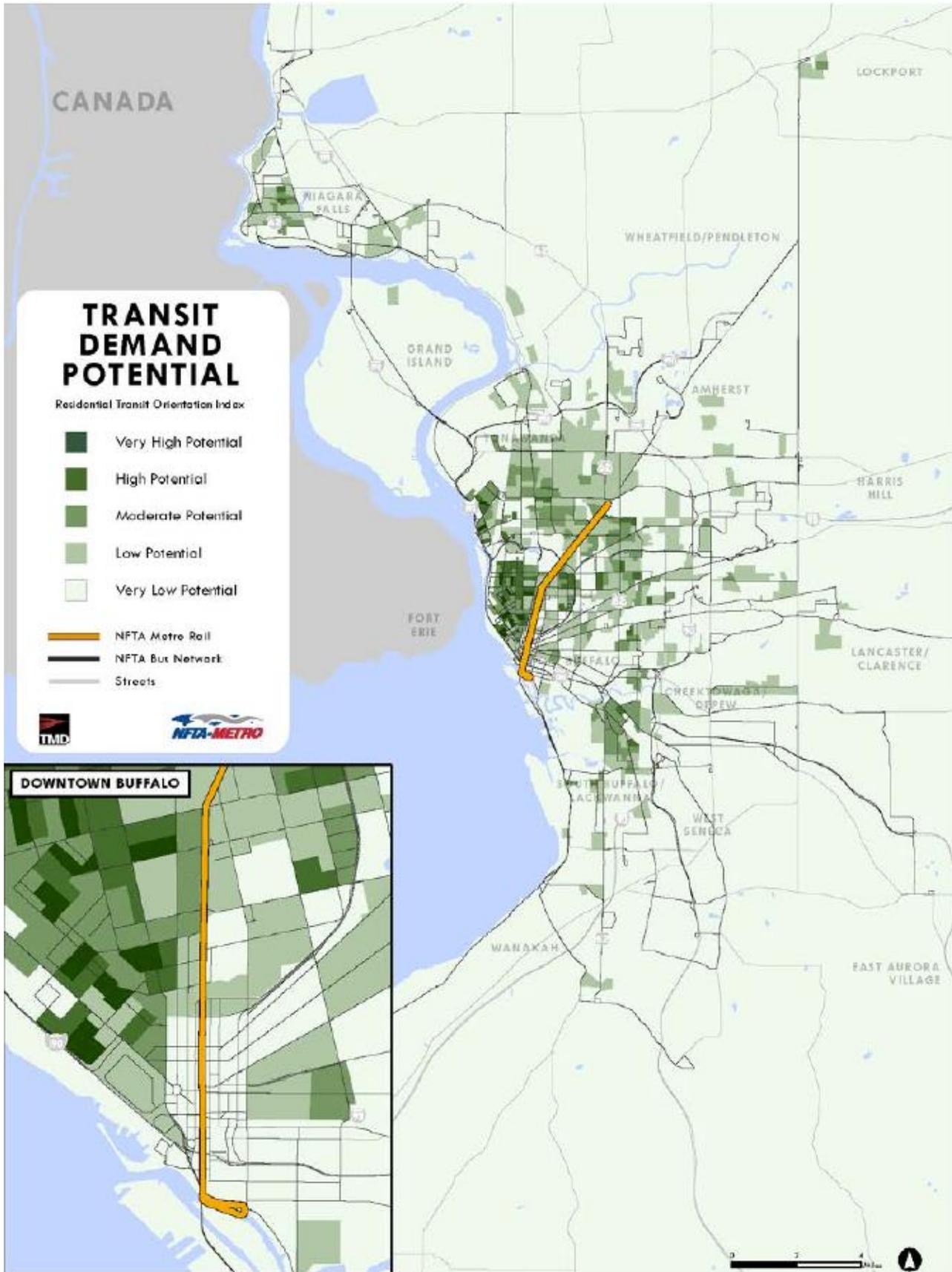
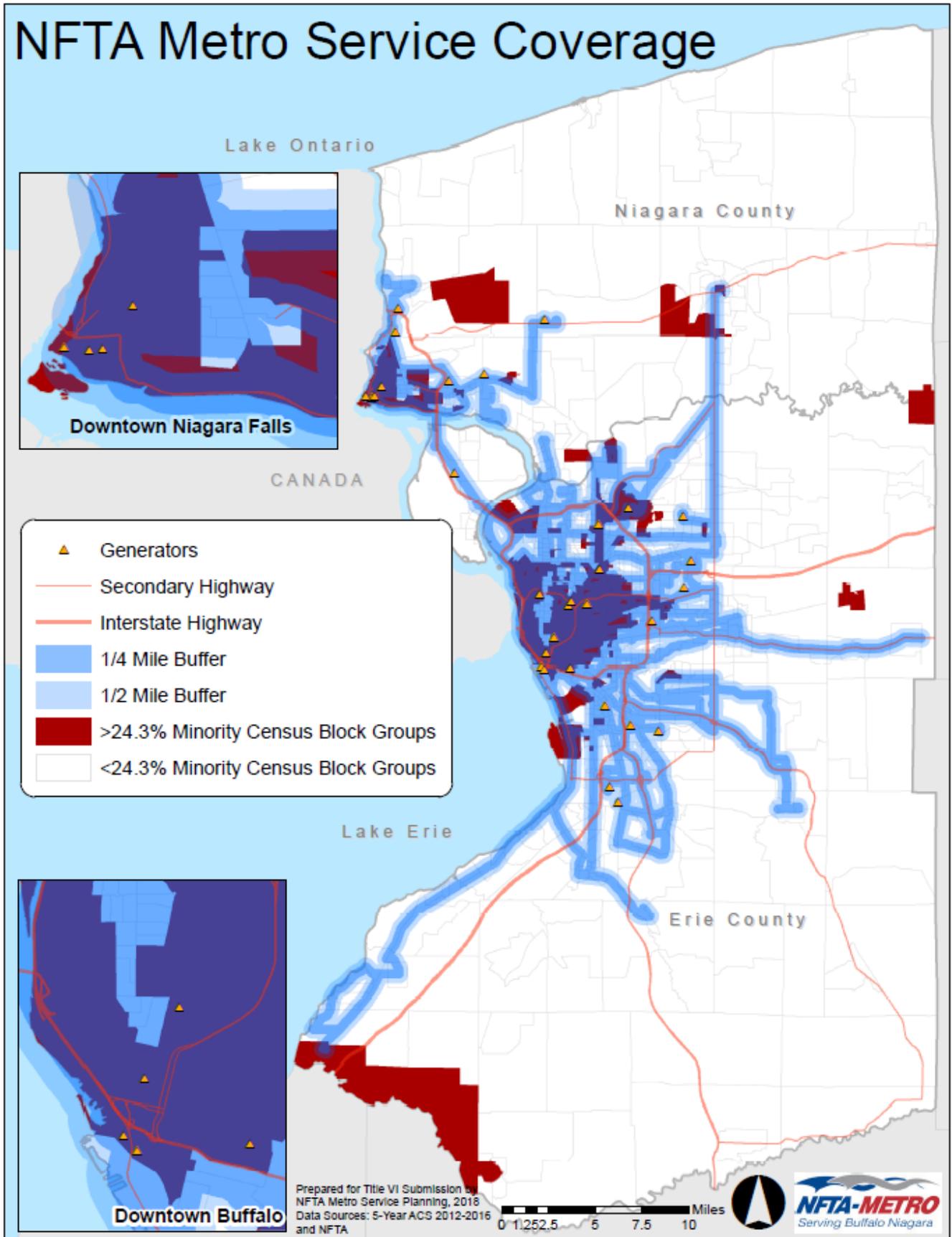


Figure 30 - Service Coverage



## Service Span

Span of service refers to the hours that service is available and is measured as the time between the first trip and last trip operated on a route. A wider span allows for more flexibility for passengers who work second shifts or use transit for non-work trips, but requires more service and higher operating costs. The tables below display the span of service guidelines by route type. Ridership levels on individual routes and funding levels may determine a shorter or longer span of service than the guideline listed.

Span of Service		
Weekday		
Primary/Core	6:00 am to 12:00 am	18 Hours
Secondary	6:00 am to 9:00 pm	15 Hours
Limited Express	AM and PM peaks	
Collector Express	AM and PM peaks	
Community Circulator	Will vary by route based on demand	
School Day Only	AM and PM peaks	

Span of Service		
Saturday		
Primary/Core	7:00 am to 11:00 pm	16 Hours
Secondary	7:00 am to 7:00 pm	12 Hours
Limited Express	No Service Operated	
Collector Express	No Service Operated	
Community Circulator	Will vary by route based on demand	
School Day Only	No Service Operated	

Span of Service		
Sunday		
Primary/Core	7:00 am to 10:00 pm	15 Hours
Secondary	9:00 am to 7:00 pm	10 Hours
Limited Express	No Service Operated	
Collector Express	No Service Operated	
Community Circulator	Will vary by route based on demand	
School Day Only	No Service Operated	

Figure 31 - Span of Service

Route Number	Route Name	Route Designation	Route Type	Weekday	Met ?	Saturday	Met?	Sunday	Met?
1	William	Minority	Secondary	455a-1030p	Y	700a-1025p	Y	735a-835p	Y
2	Clinton	Non-Minority	Secondary	510a-1145p	Y	625a-1105p	Y	755a-915p	Y
3	Grant	Minority	Primary	440a-120a	Y	610a-110a	Y	705a-1140p	Y
4	Broadway	Minority	Primary	500a-1240a	Y	620a-1155p	Y	805a-1205a	Y
5	Niagara	Minority	Primary	445a-130a	Y	600a-100a	Y	700a-1210a	Y
6	Sycamore	Minority	Primary	445a-120a	Y	600a-1210a	Y	800a-1150p	Y
7	Baynes/Richmond	Minority	Secondary	530a-645p	N	No Service	N	No Service	N
8	Main	Minority	Secondary	520a-1150p	Y	615a-1030p	Y	600a-950p	Y
11	Colvin	Minority	Secondary	510a-1040p	Y	730a-705p	N	750a-720p	Y
12	Utica	Minority	Primary	500a-110a	Y	550a-1250a	Y	610a-1145p	Y
13	Kensington	Minority	Primary	450a-1245a	Y	540a-1240a	Y	745a-1110p	Y
14	Abbott	Non-Minority	Secondary	520a-1230a	Y	620a-1230a	Y	640a-1045p	Y
15	Seneca	Minority	Secondary	455a-1245a	Y	615a-1225a	Y	655a-940p	Y
16	South Park	Non-Minority	Secondary	510a-1230a	Y	605a-1125p	Y	605a-1020p	Y
18	Jefferson	Minority	Secondary	550a-1015p	Y	800a-650p	N	810a-700p	Y
19	Bailey	Minority	Primary	500a-105a	Y	600a-1215a	Y	720a-1050p	Y
20	Elmwood	Minority	Primary	455a-1250a	Y	615a-1255a	Y	640a-1140p	Y
22	Porter/Best	Minority	Secondary	600a-1020p	Y	745a-800p	Y	800a-710p	Y
23	Fillmore Hertel	Minority	Primary	500a-1230a	Y	600a-1240a	Y	750a-1045p	Y
24	Genesee	Minority	Primary	445a-1230a	Y	530a-1240a	Y	535a-1230a	Y
25	Delaware	Minority	Primary	510a-120a	Y	615a-1210a	Y	720a-1110a	Y
26	Delavan	Minority	Primary	540a-1115p	N	600a-830p	N	620a-845p	N
29	Wohlers	Minority	Secondary	600a-650p	N	No Service	N	No Service	N
32	Amherst	Minority	Primary	530a-115a	Y	705a-1240a	Y	830a-1050p	N
34	N. Falls Blvd.	Minority	Secondary	555a-1040p	Y	800a-810p	Y	810a-925p	Y
35	Sheridan	Minority	Secondary	600a-1040p	Y	740a-810p	Y	735a-810p	Y
40	Grand Island	Minority	Primary	500a-135a	Y	640a-120a	Y	800a-130a	Y
42	Lackawanna	Minority	Secondary	630a-1220a	Y	800a-1050p	Y	800a-845p	Y
44	Lackport	Non-Minority	Secondary	530a-1145p	Y	625a-1145p	Y	625a-1100p	Y
46	Lancaster	Non-Minority	Secondary	535a-1130p	Y	835a-1135p	Y	850a-1130p	Y
47	Youngs Road	Non-Minority	Secondary	605a-1130p	Y	No Service	N	No Service	N

48	Williamsville	Non-Minority	Secondary	555a-1145p	Y	810a-940p	Y	810a-830p	Y
49	Millard Suburban	Non-Minority	Secondary	610a-605p	N	No Service	N	No Service	N
50	Main/Niagara	Minority	Secondary	500a-1220a	Y	600a-1155p	Y	605a-1150p	Y
52	Hyde Park	Minority	Secondary	500a-1115p	Y	815a-515p	N	No Service	N
54	Military	Minority	Secondary	605a-840p	N	930a-710p	N	1020a-320p	N
55	Pine Avenue	Non-Minority	Primary	500a-100a	Y	640a-1000p	N	805a-1000p	N
60	Niagara Falls	Non-Minority	Limited Express	AM/PM Peaks	Y	No Service	Y	No Service	Y
61	N. Tonawanda	Non-Minority	Collector Express	AM/PM Peaks	Y	No Service	Y	No Service	Y
64	Lockport	Non-Minority	Limited Express	AM/PM Peaks	Y	No Service	Y	No Service	Y
66	Williamsville	Non-Minority	Collector Express	AM/PM Peaks	Y	No Service	Y	No Service	Y
67	Cleveland Hill	Non-Minority	Collector Express	AM/PM Peaks	Y	No Service	Y	No Service	Y
68	George Urban	Non-Minority	Collector Express	AM/PM Peaks	Y	No Service	Y	No Service	Y
69	Alden	Non-Minority	Collector Express	AM/PM Peaks	Y	No Service	Y	No Service	Y
70	East Aurora	Non-Minority	Collector Express	AM/PM Peaks	Y	No Service	Y	No Service	Y
72	Orchard Park	Non-Minority	Collector Express	AM/PM Peaks	Y	No Service	Y	No Service	Y
74	Boston	Non-Minority	Collector Express	AM/PM Peaks	Y	No Service	Y	No Service	Y
75	West Seneca	Non-Minority	Collector Express	AM/PM Peaks	Y	No Service	Y	No Service	Y
76	Lotus Bay	Non-Minority	Collector Express	AM/PM Peaks	Y	No Service	Y	No Service	Y
79	Tonawanda	Non-Minority	Collector Express	AM/PM Peaks	Y	No Service	Y	No Service	Y
81	East Side	Minority	Collector Express	AM/PM Peaks	Y	No Service	Y	No Service	Y
101	No.-South	Minority	School Day Only	AM/PM Peaks	Y	No Service	Y	No Service	Y
102	Bailey	Minority	School Day Only	AM/PM Peaks	Y	No Service	Y	No Service	Y
103	E.-Suburban	Non-Minority	School Day Only	AM/PM Peaks	Y	No Service	Y	No Service	Y
104	So. Central	Minority	School Day Only	AM/PM Peaks	Y	No Service	Y	No Service	Y
106	So.-Suburban	Minority	School Day Only	AM/PM Peaks	Y	No Service	Y	No Service	Y
110	West-North	Minority	School Day Only	AM/PM Peaks	Y	No Service	Y	No Service	Y
111	So.-Michigan	Minority	School Day Only	AM/PM Peaks	Y	No Service	Y	No Service	Y
112	Grant-North	Minority	School Day Only	AM/PM Peaks	Y	No Service	Y	No Service	Y
145	Metro Rail	Minority	Light Rail	510a-1250a	Y	700a-1250a	Y	800a-1150p	Y
155	NF Trolley	Non-Minority	Community Circulator	900a-1245a	Y	900a-1245a	Y	900a-1245a	Y
204	Airport-Downtown	Non-Minority	Limited Express	AM/PM Peaks	Y	No Service	Y	No Service	Y
206	Buffalo State	Minority	Community Circulator	500p-835p	Y	1015a-605p	Y	1015a-605p	Y

Several secondary routes do not meet the service standards for service span because there is not service on these routes on weekends – routes 7, 29, 47, 49, and 52 (Saturday only). Service has been reduced on these routes over time to match the low demand we have measured. Routes 50 to 55 operate in Niagara County where there is generally lower population density and therefore ridership demand, which has resulted in a decreased service span relative to other routes of their kind. Possible reasons for low demand on these routes will be examined to find ways to increase productivity. Route 26 service span and ridership patterns will be reviewed to determine whether service span needs to be increased, or whether the route would be better classified as a secondary route.

NFTA Metro service standards for span of service are largely met by current levels of service. Minority and non-minority routes perform similarly for this standard. Routes not meeting minimum service span are largely routes experiencing low ridership demand.

## Service Frequency

The frequency of service on a particular route (i.e. headway of time interval between scheduled trips) will be based on the existing and/or projected ridership. Service will operate more frequently on high-demand routes and during peak periods. Guidelines for service frequency are listed below and will be applied to assure that a reliable and attractive, but appropriate level of service is available throughout the day.

Service Frequency					
Route Type	Weekday			Saturday	Sunday
	Peak	Base	Evening	Base	Base
Primary/Core	10 min.	30 min.	60 min.	60 min	60 min
Secondary	15 min.	40 min.	120 min.	120 min.	120 min.
Limited Express	As needed during peak periods			No Service Operated	
Collector Express	As needed during peak periods			No Service Operated	
Community Circulator	As needed will vary by route				
School Day Only	As needed during peak periods			No Service Operated	

Headway data below is based off the Spring 2018 schedule.

Figure 32 - Service Frequency

Route Number	Route Name	Route Designation	Route Type	Average Weekday Peak	Met?	Average Weekday Base	Met?	Average Weekday Evening	Met?	Average Saturday	Met?	Average Sunday	Met?
1	William	Minority	Secondary	30	N	30	Y	60	Y	60	Y	60	Y
2	Clinton	Non-Minority	Secondary	20	N	30	Y	60	Y	60	Y	60	Y
3	Grant	Minority	Primary	10	Y	15	Y	60	Y	30	Y	30	Y
4	Broadway	Minority	Primary	15	N	20	Y	60	Y	30	Y	45	Y
5	Niagara	Minority	Primary	10	Y	15	Y	60	Y	40	Y	30	Y
6	Sycamore	Minority	Primary	15	N	30	Y	60	Y	30	Y	30	Y
7	Baynes/Richmond	Minority	Secondary	30	N	60	N	No Service	N	No Service	N	No Service	N
8	Main	Minority	Secondary	30	N	30	Y	60	Y	45	Y	45	Y
11	Colvin	Minority	Secondary	15	Y	60	N	60	Y	60	Y	60	Y
12	Utica	Minority	Primary	10	Y	15	Y	60	Y	30	Y	30	Y
13	Kensington	Minority	Primary	15	N	30	Y	45	Y	30	Y	30	Y
14	Abbott	Non-Minority	Secondary	20	N	30	Y	60	Y	90	Y	60	Y
15	Seneca	Minority	Secondary	15	Y	30	Y	60	Y	45	Y	45	Y
16	South Park	Non-Minority	Secondary	20	N	30	Y	60	Y	90	Y	60	Y
18	Jefferson	Minority	Secondary	30	N	60	N	60	Y	60	Y	90	Y
19	Bailey	Minority	Primary	10	Y	20	Y	40	Y	30	Y	30	Y
20	Elmwood	Minority	Primary	15	N	15	Y	30	Y	30	Y	30	Y
22	Porter/Best	Minority	Secondary	15	Y	60	N	60	Y	60	Y	90	Y
23	Fillmore Hertel	Minority	Primary	10	Y	15	Y	60	Y	30	Y	40	Y
24	Genesee	Minority	Primary	10	Y	30	Y	45	Y	30	Y	50	Y
25	Delaware	Minority	Primary	15	N	20	Y	60	Y	30	Y	30	Y
26	Delavan	Minority	Primary	15	N	30	Y	60	Y	60	Y	60	Y
29	Wohlers	Minority	Secondary	75	N	120	N	No Service	N	No Service	N	No Service	N
32	Amherst	Minority	Primary	10	Y	30	Y	60	Y	30	Y	40	Y
34	N. Falls Blvd.	Minority	Secondary	25	N	45	N	60	Y	30	Y	30	Y
35	Sheridan	Minority	Secondary	45	N	60	N	60	Y	60	Y	60	Y
40	Grand Island	Minority	Primary	30	N	35	N	60	Y	60	Y	45	Y
42	Lackawanna	Minority	Secondary	60	N	75	N	60	Y	60	Y	60	Y
44	Lockport	Non-Minority	Secondary	60	N	75	N	60	Y	300 (4 trips)	N	480 (2 trips)	
46	Lancaster	Non-Minority	Secondary	60	N	60	N	60	Y	60	Y	75	Y
47	Youngs Road	Non-Minority	Secondary	30	N	120	N	80	Y	No Service	N	No Service	N
48	Williamsville	Non-Minority	Secondary	30	N	60	N	80	Y	75	Y	80	Y
49	Millard Suburban	Non-Minority	Secondary	90	N	120	N	No Service	N	No Service	N	No Service	N
50	Main/Niagara	Minority	Secondary	60	N	60	N	120	Y	90	Y	60	Y
52	Hyde Park	Minority	Secondary	60	N	60	N	120	Y	90	Y	No Service	N
54	Military	Minority	Secondary	120	N	120	N	75	Y	120	Y	120	Y
55	Pine Avenue	Non-Minority	Primary	30	N	30	Y	60	Y	60	Y	110	N
60	Niagara Falls	Non-Minority	Limited Express	Peak Hours	Y	Peak Hours	Y	No Service	Y	No Service	Y	No Service	Y

61	N. Tonawanda	Non-Minority	Collector Express	Peak Hours	Y	Peak Hours	Y	No Service	Y	No Service	Y	No Service	Y
64	Lockport	Non-Minority	Limited Express	Peak Hours	Y	Peak Hours	Y	No Service	Y	No Service	Y	No Service	Y
66	Williamsville	Non-Minority	Collector Express	Peak Hours	Y	Peak Hours	Y	No Service	Y	No Service	Y	No Service	Y
67	Cleveland Hill	Non-Minority	Collector Express	Peak Hours	Y	Peak Hours	Y	No Service	Y	No Service	Y	No Service	Y
68	George Urban	Non-Minority	Collector Express	Peak Hours	Y	Peak Hours	Y	No Service	Y	No Service	Y	No Service	Y
69	Alden	Non-Minority	Collector Express	Peak Hours	Y	Peak Hours	Y	No Service	Y	No Service	Y	No Service	Y
70	East Aurora	Non-Minority	Collector Express	Peak Hours	Y	Peak Hours	Y	No Service	Y	No Service	Y	No Service	Y
72	Orchard Park	Non-Minority	Collector Express	Peak Hours	Y	Peak Hours	Y	No Service	Y	No Service	Y	No Service	Y
74	Boston	Non-Minority	Collector Express	Peak Hours	Y	Peak Hours	Y	No Service	Y	No Service	Y	No Service	Y
75	West Seneca	Non-Minority	Collector Express	Peak Hours	Y	Peak Hours	Y	No Service	Y	No Service	Y	No Service	Y
76	Lotus Bay	Non-Minority	Collector Express	Peak Hours	Y	Peak Hours	Y	No Service	Y	No Service	Y	No Service	Y
79	Tonawanda	Non-Minority	Collector Express	Peak Hours	Y	Peak Hours	Y	No Service	Y	No Service	Y	No Service	Y
81	East Side	Minority	Collector Express	Peak Hours	Y	Peak Hours	Y	No Service	Y	No Service	Y	No Service	Y
101	No.-South	Minority	School Day Only	Peak Hours	Y	Peak Hours	Y	No Service	Y	No Service	Y	No Service	Y
102	Bailey	Minority	School Day Only	Peak Hours	Y	Peak Hours	Y	No Service	Y	No Service	Y	No Service	Y
103	E.-Suburban	Non-Minority	School Day Only	Peak Hours	Y	Peak Hours	Y	No Service	Y	No Service	Y	No Service	Y
104	So. Central	Minority	School Day Only	Peak Hours	Y	Peak Hours	Y	No Service	Y	No Service	Y	No Service	Y
106	So.-Suburban	Minority	School Day Only	Peak Hours	Y	Peak Hours	Y	No Service	Y	No Service	Y	No Service	Y
110	West-North	Minority	School Day Only	Peak Hours	Y	Peak Hours	Y	No Service	Y	No Service	Y	No Service	Y
111	So.-Michigan	Minority	School Day Only	Peak Hours	Y	Peak Hours	Y	No Service	Y	No Service	Y	No Service	Y
112	Grant-North	Minority	School Day Only	Peak Hours	Y	Peak Hours	Y	No Service	Y	No Service	Y	No Service	Y
145	<b>Metro Rail</b>	Minority	Primary	10	Y	12	Y	20	Y	15	Y	20	Y
155	NF Trolley	Non-Minority	Community Circulator	60	Y	60	Y	60	Y	60	Y	60	Y
204	Airport-Downtown	Non-Minority	Limited Express	30	Y	90	Y	No Service	Y	No Service	Y	No Service	Y
206	Buffalo State	Minority	Community Circulator	44 (evenings)	Y	44 (evenings)	Y	44 (evenings)	Y	42	Y	42	Y

Service standards for peak service are not met by a majority of primary and secondary routes. Funding and staffing levels currently only allow for the highest-ridership routes to have the desired peak headways. Service standards for service frequency will be evaluated and potentially revised to more accurately reflect the system’s current service levels. This discrepancy can be seen to a lesser extent in weekday base and weekend service, but mostly in routes with low ridership. Low-performing routes are analyzed on a continual basis to improve ridership productivity.

This service standard mostly pertains to primary and secondary routes with regular service throughout the day. Since the majority of primary and secondary routes are minority routes, unmet service frequency standards seem to affect minority populations inordinately. In reality, it reflects a need to adjust our service standards for service frequency, especially during peak periods. Notably, all primary and secondary routes meeting the service frequency service standards (10) are minority routes.

## Passenger Load

The intent of load guidelines is to balance passenger comfort and safety with operating costs and efficiencies. Most passengers should be able to obtain a seat on a Metro vehicle for at least a major portion of the trip. During peak travel periods, some patrons may be required to stand. There is an acceptable number of standees before the bus is considered overcrowded. Also, the maximum time that an individual passenger should be expected to stand on a given trip is 15 minutes. The load guidelines shown below represent the total number of riders as a percent of the number of seats on the vehicle.

Passenger Load Guidelines		
Route Type	Peak Hours	Off-Peak Hours and Weekends
Primary/Core	140%	120%
Secondary	120%	100%
Limited Express	100%	No Service Operated
Collector Express	100%	No Service Operated
Community Circulator	120%	100%
School Day Only	140%	No Service Operated

The data shown below is from Spring 2018 automatic passenger counting (APC), with the exception of Route 155, which operates in summer months. Summer 2017 APC data was used for this route. Peak times used for the categories below are 7:00 AM to 9:59 AM, and 2:00 PM to 5:59 PM. Anything outside of these hours are considered off-peak. Max load factor was calculated for each sampled trip collected by APC systems, and all samples within these time categories were averaged to arrive at average max load factor by route.

Figure 33 - Passenger Load

Route Number	Route Name	Route Designation	Route Type	Weekday Peak Average Max Load Factor (Actual)	Met?	Off-Peak & Weekends (actual)	Met?
1	William	Minority	Secondary	45%	Y	27%	Y
2	Clinton	Non-Minority	Secondary	47%	Y	28%	Y
3	Grant	Minority	Primary	52%	Y	41%	Y
4	Broadway	Minority	Primary	45%	Y	36%	Y
5	Niagara	Minority	Primary	48%	Y	40%	Y
6	Sycamore	Minority	Primary	37%	Y	35%	Y
7	Baynes/Richmond	Minority	Secondary	24%	Y	12%	Y
8	Main	Minority	Secondary	40%	Y	24%	Y
11	Colvin	Minority	Secondary	37%	Y	22%	Y
12	Utica	Minority	Primary	57%	Y	41%	Y
13	Kensington	Minority	Primary	43%	Y	32%	Y
14	Abbott	Non-Minority	Secondary	42%	Y	27%	Y
15	Seneca	Minority	Secondary	40%	Y	36%	Y
16	South Park	Non-Minority	Secondary	52%	Y	36%	Y
18	Jefferson	Minority	Secondary	28%	Y	20%	Y
19	Bailey	Minority	Primary	53%	Y	35%	Y
20	Elmwood	Minority	Primary	53%	Y	37%	Y
22	Porter/Best	Minority	Secondary	50%	Y	31%	Y
23	Fillmore Hertel	Minority	Primary	53%	Y	36%	Y
24	Genesee	Minority	Primary	46%	Y	39%	Y
25	Delaware	Minority	Primary	42%	Y	31%	Y
26	Delavan	Minority	Primary	50%	Y	35%	Y
29	Wohlers	Minority	Secondary	22%	Y	18%	Y
32	Amherst	Minority	Primary	54%	Y	40%	Y
34	N. Falls Blvd.	Minority	Secondary	38%	Y	32%	Y
35	Sheridan	Minority	Secondary	31%	Y	23%	Y

40	Grand Island	Minority	Primary	44%	Y	36%	Y
42	Lackawanna	Minority	Secondary	24%	Y	17%	Y
44	Lockport	Non-Minority	Secondary	50%	Y	22%	Y
46	Lancaster	Non-Minority	Secondary	28%	Y	22%	Y
47	Youngs Road	Non-Minority	Secondary	28%	Y	22%	Y
48	Williamsville	Non-Minority	Secondary	38%	Y	34%	Y
49	Millard Suburban	Non-Minority	Secondary	26%	Y	24%	Y
50	Main/Niagara	Minority	Secondary	29%	Y	22%	Y
52	Hyde Park	Minority	Secondary	21%	Y	18%	Y
54	Military	Minority	Secondary	9%	Y	9%	Y
55	Pine Avenue	Non-Minority	Primary	30%	Y	24%	Y
60	Niagara Falls	Non-Minority	Limited Express	20%	Y	No service	Y
61	N. Tonawanda	Non-Minority	Collector Express	20%	Y	No service	Y
64	Lockport	Non-Minority	Limited Express	26%	Y	No service	Y
66	Williamsville	Non-Minority	Collector Express	29%	Y	No service	Y
67	Cleveland Hill	Non-Minority	Collector Express	36%	Y	No service	Y
68	George Urban	Non-Minority	Collector Express	19%	Y	No service	Y
69	Alden	Non-Minority	Collector Express	23%	Y	No service	Y
70	East Aurora	Non-Minority	Collector Express	20%	Y	No service	Y
72	Orchard Park	Non-Minority	Collector Express	17%	Y	No service	Y
74	Boston	Non-Minority	Collector Express	30%	Y	No service	Y
75	West Seneca	Non-Minority	Collector Express	32%	Y	No service	Y
76	Lotus Bay	Non-Minority	Collector Express	29%	Y	No service	Y
79	Tonawanda	Non-Minority	Collector Express	20%	Y	No service	Y
81	East Side	Minority	Collector Express	45%	Y	No service	Y
101	No.-South	Minority	School Day Only	64%	Y	No service	Y
102	Bailey	Minority	School Day Only	48%	Y	No service	Y
103	E.-Suburban	Non-Minority	School Day Only	51%	Y	No service	Y
104	So. Central	Minority	School Day Only	105%	Y	No service	Y
106	So.-Suburban	Minority	School Day Only	28%	Y	No service	Y
110	West-North	Minority	School Day Only	55%	Y	No service	Y
111	So.-Michigan	Minority	School Day Only	59%	Y	No service	Y
112	Grant-North	Minority	School Day Only	18%	Y	No service	Y
145	Metro Rail	Minority	Primary	48%	Y	31%	Y
155	NF Trolley	Non-Minority	Community Circulator	28%	Y	28%	Y
204	Airport-Downtown	Non-Minority	Limited Express	15%	Y	17%	Y
206	Buffalo State	Minority	Community Circulator	10%	Y	19%	Y

On average, no NFTA Metro route exceeds the maximum load factors outlined in the agency’s service standards. Since currently no routes or trips are “exceeding the maximum load factor on a regular basis or over a sustained period of time”, there is no need to “evaluate the potential for improving the service frequency or adjusting schedule times” on this basis.

### Service Reliability

- **84% of all vehicles should arrive at scheduled time points on-time.**

The window for Metro Bus On-Time is six minutes. An arrival is considered on time if it is less than two minutes early and less than four minutes late. Late arrivals can be affected by weather conditions, street conditions, boarding/alighting patterns or traffic along the route. The window for Metro Rail On-Time is one minute. The data below is from fiscal year 2017-2018 and captured by our AVL system.

Figure 34 - Service Reliability

Route Number	Route Name	Route Designation	Route Type	Percent On-Time	Met?
1	William	Minority	Secondary	89.1%	Y
2	Clinton	Non-Minority	Secondary	87.9%	Y
3	Grant	Minority	Primary	80.0%	N
4	Broadway	Minority	Primary	87.4%	Y
5	Niagara	Minority	Primary	82.4%	N
6	Sycamore	Minority	Primary	86.3%	Y
7	Baynes/Richmond	Minority	Secondary	86.0%	Y
8	Main	Minority	Secondary	85.4%	Y
11	Colvin	Minority	Secondary	83.4%	N
12	Utica	Minority	Primary	82.6%	N
13	Kensington	Minority	Primary	87.0%	Y
14	Abbott	Non-Minority	Secondary	86.1%	Y
15	Seneca	Minority	Secondary	90.0%	Y
16	South Park	Non-Minority	Secondary	85.5%	Y
18	Jefferson	Minority	Secondary	91.6%	Y
19	Bailey	Minority	Primary	88.5%	Y
20	Elmwood	Minority	Primary	80.3%	N
22	Porter/Best	Minority	Secondary	87.8%	Y
23	Fillmore Hertel	Minority	Primary	82.7%	N
24	Genesee	Minority	Primary	84.4%	Y
25	Delaware	Minority	Primary	82.8%	N
26	Delavan	Minority	Primary	88.2%	Y
29	Wohlers	Minority	Secondary	87.8%	Y
32	Amherst	Minority	Primary	80.6%	N
34	N. Falls Blvd.	Minority	Secondary	84.1%	Y
35	Sheridan	Minority	Secondary	81.9%	N
40	Grand Island	Minority	Primary	83.0%	N
42	Lackawanna	Minority	Secondary	86.6%	Y
44	Lockport	Non-Minority	Secondary	83.6%	Y
46	Lancaster	Non-Minority	Secondary	81.4%	N
47	Youngs Road	Non-Minority	Secondary	85.4%	Y
48	Williamsville	Non-Minority	Secondary	87.5%	Y
49	Millard Suburban	Non-Minority	Secondary	82.8%	N
50	Main/Niagara	Minority	Secondary	77.5%	N
52	Hyde Park	Minority	Secondary	82.4%	N
54	Military	Minority	Secondary	83.0%	N
55	Pine Avenue	Non-Minority	Primary	73.5%	N
60	Niagara Falls	Non-Minority	Limited Express	75.4%	N
61	N. Tonawanda	Non-Minority	Collector Express	80.3%	N
64	Lockport	Non-Minority	Limited Express	70.0%	N
66	Williamsville	Non-Minority	Collector Express	77.3%	N
67	Cleveland Hill	Non-Minority	Collector Express	76.1%	N
68	George Urban	Non-Minority	Collector Express	76.7%	N
69	Alden	Non-Minority	Collector Express	74.1%	N
70	East Aurora	Non-Minority	Collector Express	76.6%	N
72	Orchard Park	Non-Minority	Collector Express	76.5%	N
74	Boston	Non-Minority	Collector Express	79.4%	N
75	West Seneca	Non-Minority	Collector Express	79.3%	N
76	Lotus Bay	Non-Minority	Collector Express	71.1%	N
79	Tonawanda	Non-Minority	Collector Express	78.7%	N
81	East Side	Minority	Collector Express	84.6%	Y
101	No.-South	Minority	School Day Only	65.5%	N
102	Bailey	Minority	School Day Only	79.8%	N
103	E.-Suburban	Non-Minority	School Day Only	67.9%	N
104	So. Central	Minority	School Day Only	70.5%	N
106	So.-Suburban	Minority	School Day Only	68.2%	N
110	West-North	Minority	School Day Only	74.7%	N

111	So.-Michigan	Minority	School Day Only	59.3%	N
112	Grant-North	Minority	School Day Only	61.9%	N
145	Metro Rail	Minority	Primary	85.5%	Y
155	NF Trolley	Non-Minority	Community Circulator	75.0%	N
204	Airport-Downtown	Non-Minority	Limited Express	86.7%	Y
206	Buffalo State	Minority	Community Circulator	90.6%	Y

School day only trips are generally excluded from system on-time performance, since afternoon trips can depart early from a school if the bus is full. Generally, on-time performance for express trips is lower since there are often two timepoints – the start and end termini – and it affects passengers positively if they arrive at their destination early.

Excluding school day only routes, vehicles on minority routes arrived on time 84.95 percent of the time in 2017-2018, while non-minority routes arrived on time 79.45 percent of the time.

- **A minimum of 99% of annual scheduled trips shall be operated.**

Out of the 801,035 fixed route bus trips scheduled to operate in fiscal year 2017-2018, 797,352 trips were operated (99.5%). This meets the standard for the percent of trips operated. We currently do not report the percent of scheduled trips operated by route on an annual basis.

### Bus Stop Placement and Spacing

Bus stop location and spacing are important to existing and potential passengers in terms of the accessibility of transit. Bus stop placement requires a balance between maximizing customer access and minimizing service delays as well as a sensitivity to adjacent land uses. With an inadequate number of stops, passengers may be discouraged from accessing the system. With too many stops, the service is slowed and can become less attractive to customers. In addition, customers must feel comfortable waiting at a stop and the impacts on adjacent property owners should be minimized to the extent possible.

Bus Stop Placement and Spacing	
Persons per Sq. Mile	Stop Spacing
Over 5,000	Every Other Block
2,000 – 5,000	5 to 7 per mile
Under 2,000	Flag Stop

Within the city of Buffalo and Niagara Falls, NFTA Metro attempts to place stops every 0.2 miles, which generally corresponds to every other block. Below are average stop distances by route based on current routing and stop placement.

Figure 35 - Bus Stop Placement and Spacing

Route Number	Route Name	Route Designation	Route Type	Average Stop Distance
1	William	Minority	Secondary	0.14
2	Clinton	Non-Minority	Secondary	0.15
3	Grant	Minority	Primary	0.14
4	Broadway	Minority	Primary	0.14
5	Niagara	Minority	Primary	0.14
6	Sycamore	Minority	Primary	0.14
7	Baynes/Richmond	Minority	Secondary	0.13
8	Main	Minority	Secondary	0.14
11	Colvin	Minority	Secondary	0.15
12	Utica	Minority	Primary	0.14

13	Kensington	Minority	Primary	0.15
14	Abbott	Non-Minority	Secondary	0.19
15	Seneca	Minority	Secondary	0.16
16	South Park	Non-Minority	Secondary	0.17
18	Jefferson	Minority	Secondary	0.14
19	Bailey	Minority	Primary	0.15
20	Elmwood	Minority	Primary	0.13
22	Porter/Best	Minority	Secondary	0.13
23	Fillmore Hertel	Minority	Primary	0.14
24	Genesee	Minority	Primary	0.16
25	Delaware	Minority	Primary	0.15
26	Delavan	Minority	Primary	0.15
29	Wohlers	Minority	Secondary	0.13
32	Amherst	Minority	Primary	0.17
34	N. Falls Blvd.	Minority	Secondary	0.20
35	Sheridan	Minority	Secondary	0.20
40	Grand Island	Minority	Primary	0.26
42	Lackawanna	Minority	Secondary	0.24
44	Lockport	Non-Minority	Secondary	0.29
46	Lancaster	Non-Minority	Secondary	0.27
47	Youngs Road	Non-Minority	Secondary	0.21
48	Williamsville	Non-Minority	Secondary	0.19
49	Millard Suburban	Non-Minority	Secondary	0.29
50	Main/Niagara	Minority	Secondary	0.16
52	Hyde Park	Minority	Secondary	0.15
54	Military	Minority	Secondary	0.22
55	Pine Avenue	Non-Minority	Primary	0.20
60	Niagara Falls	Non-Minority	Limited Express	0.76
61	N. Tonawanda	Non-Minority	Collector Express	0.55
64	Lockport	Non-Minority	Limited Express	1.95
66	Williamsville	Non-Minority	Collector Express	0.45
67	Cleveland Hill	Non-Minority	Collector Express	0.22
68	George Urban	Non-Minority	Collector Express	0.46
69	Alden	Non-Minority	Collector Express	0.54
70	East Aurora	Non-Minority	Collector Express	0.46
72	Orchard Park	Non-Minority	Collector Express	0.81
74	Boston	Non-Minority	Collector Express	0.31
75	West Seneca	Non-Minority	Collector Express	0.29
76	Lotus Bay	Non-Minority	Collector Express	0.40
79	Tonawanda	Non-Minority	Collector Express	0.19
81	East Side	Minority	Collector Express	0.17
101	No.-South	Minority	School Day Only	0.15
102	Bailey	Minority	School Day Only	0.23
103	E.-Suburban	Non-Minority	School Day Only	0.25
104	So. Central	Minority	School Day Only	0.16
106	So.-Suburban	Minority	School Day Only	0.20
110	West-North	Minority	School Day Only	0.13
111	So.-Michigan	Minority	School Day Only	0.17
112	Grant-North	Minority	School Day Only	0.13
145	Metro Rail	Minority	Light Rail	*
155	NF Trolley	Non-Minority	Community Circulator	0.32**
204	Airport-Downtown	Non-Minority	Limited Express	0.44
206	Buffalo State	Minority	Community Circulator	0.28

\* Bus stop placement guidelines do not pertain to Metro Rail.

\*\* Data from Summer 2017

Average distances between stops are fairly optimal for all routes. Primary and secondary routes within the city show inter-stop distances well below the 0.2 mile mark, suggesting NFTA Metro stops are very accessible and require little walking. Express routes have larger average stop spacing.

Minority populations are not adversely affected on the basis of bus stop spacing, as minority routes have an average stop spacing of .16 miles, while non-minority routes have an average stop spacing of .42 miles. This is largely due to the fact that minority populations are concentrated within the city of Buffalo and Niagara Falls where spacing is smaller. Furthermore, a large portion of non-minority routes are express routes, which have larger inter-stop distances.

## Ridership Productivity

Passenger boardings per revenue hour are calculated by dividing the number of boardings per route (reported by Metro’s Automatic Passenger Counter (APC) data) by the number of revenue hours of service. This measure is calculated and monitored quarterly. The passenger per revenue hour guideline is based on existing conditions, historical trends, vehicle capacity, comparison with peer agencies, and nature of route type.

Passengers per Hour Guideline			
Route Type	Weekday	Saturday	Sunday
Primary/Core	37	37	26
Secondary	24	21	15
Limited Express	18	No Service Operated	
Collector Express	20	No Service Operated	
Community Circulator	8	8	8
School Day Only	28	No Service Operated	

Figure 36 - Ridership Productivity

Route Number	Route Name	Route Designation	Route Type	Weekday Passengers per Revenue Hour	Met?	Saturday Passengers per Revenue Hour	Met?	Sunday Passengers per Revenue Hour	Met?
1	William	Minority	Secondary	30	Y	19	N	15	Y
2	Clinton	Non-Minority	Secondary	26	Y	21	Y	17	Y
3	Grant	Minority	Primary	38	Y	30	N	24	N
4	Broadway	Minority	Primary	35	N	30	N	23	N
5	Niagara	Minority	Primary	33	N	36	N	26	N
6	Sycamore	Minority	Primary	25	N	26	N	20	N
7	Baynes/Richmond	Minority	Secondary	15	N	No Service	Y	No Service	Y
8	Main	Minority	Secondary	27	Y	16	N	15	N
11	Colvin	Minority	Secondary	18	N	15	N	11	N
12	Utica	Minority	Primary	34	N	31	N	24	N
13	Kensington	Minority	Primary	35	N	26	N	21	N
14	Abbott	Non-Minority	Secondary	25	Y	25	Y	16	Y
15	Seneca	Minority	Secondary	30	Y	23	Y	18	Y
16	South Park	Non-Minority	Secondary	28	Y	30	Y	22	Y
18	Jefferson	Minority	Secondary	22	N	18	N	15	Y
19	Bailey	Minority	Primary	43	Y	34	N	28	Y
20	Elmwood	Minority	Primary	35	N	34	N	30	Y
22	Porter/Best	Minority	Secondary	34	Y	22	Y	19	Y
23	Fillmore Hertel	Minority	Primary	34	N	28	N	25	N
24	Genesee	Minority	Primary	33	N	22	N	22	N
25	Delaware	Minority	Primary	25	N	24	N	19	N
26	Delavan	Minority	Primary	35	N	31	N	20	N
29	Wohlers	Minority	Secondary	14	N	No Service	Y	No Service	Y
32	Amherst	Minority	Primary	25	N	20	N	19	N
34	N. Falls Blvd.	Minority	Secondary	23	N	21	N	16	Y
35	Sheridan	Minority	Secondary	15	N	14	N	9	N
40	Grand Island	Minority	Primary	17	N	17	N	16	N
42	Lackawanna	Minority	Secondary	13	N	9	N	6	N
44	Lockport	Non-Minority	Secondary	17	N	15	N	11	N

46	Lancaster	Non-Minority	Secondary	16	N	13	N	10	N
47	Youngs Road	Non-Minority	Secondary	15	N	No Service	Y	No Service	Y
48	Williamsville	Non-Minority	Secondary	25	Y	28	Y	24	Y
49	Millard Suburban	Non-Minority	Secondary	19	N	No Service	Y	No Service	Y
50	Main/Niagara	Minority	Secondary	11	N	12	N	12	N
52	Hyde Park	Minority	Secondary	9	N	9	N	No Service	Y
54	Military	Minority	Secondary	11	N	13	N	10	N
55	Pine Avenue	Non-Minority	Primary	12	N	19	N	19	N
60	Niagara Falls	Non-Minority	Limited Express	13	N	No Service	Y	No Service	Y
61	N. Tonawanda	Non-Minority	Collector Express	14	N	No Service	Y	No Service	Y
64	Lockport	Non-Minority	Limited Express	7	N	No Service	Y	No Service	Y
66	Williamsville	Non-Minority	Collector Express	12	N	No Service	Y	No Service	Y
67	Cleveland Hill	Non-Minority	Collector Express	14	N	No Service	Y	No Service	Y
68	George Urban	Non-Minority	Collector Express	10	N	No Service	Y	No Service	Y
69	Alden	Non-Minority	Collector Express	11	N	No Service	Y	No Service	Y
70	East Aurora	Non-Minority	Collector Express	10	N	No Service	Y	No Service	Y
72	Orchard Park	Non-Minority	Collector Express	9	N	No Service	Y	No Service	Y
74	Boston	Non-Minority	Collector Express	13	N	No Service	Y	No Service	Y
75	West Seneca	Non-Minority	Collector Express	18	N	No Service	Y	No Service	Y
76	Lotus Bay	Non-Minority	Collector Express	13	N	No Service	Y	No Service	Y
79	Tonawanda	Non-Minority	Collector Express	14	N	No Service	Y	No Service	Y
81	East Side	Minority	Collector Express	22	Y	No Service	Y	No Service	Y
101	No.-South	Minority	School Day Only	36	Y	No Service	Y	No Service	Y
102	Bailey	Minority	School Day Only	42	Y	No Service	Y	No Service	Y
103	E.-Suburban	Non-Minority	School Day Only	15	N	No Service	Y	No Service	Y
104	So. Central	Minority	School Day Only	84	Y	No Service	Y	No Service	Y
106	So.-Suburban	Minority	School Day Only	9	N	No Service	Y	No Service	Y
110	West-North	Minority	School Day Only	65	Y	No Service	Y	No Service	Y
111	So.-Michigan	Minority	School Day Only	31	Y	No Service	Y	No Service	Y
112	Grant-North	Minority	School Day Only	12	N	No Service	Y	No Service	Y
145	Metro Rail	Minority	Primary	55**	Y	**	N	**	N
155	NF Trolley	Non-Minority	Community Circulator	10	Y	12	Y	11	Y
204	Airport-Downtown	Non-Minority	Limited Express	6	N	No Service	Y	No Service	Y
206	Buffalo State	Minority	Community Circulator	11	Y	7	N	7	N

\*\*Metro Rail riders per revenue hour data is an annual average. Statistics by day type do not meet statistical accuracy requirements.

Total fixed route ridership has decreased by 18.4% since 2012 when our current Service Standards were adopted. This downward trend in ridership has affected many transit agencies within the United States. Ridership productivity standards should be reexamined considering the inability of most routes to meet standards for all day types. Among routes that operate on weekdays, fourteen out of the nineteen routes (74%) that meet ridership productivity standards are minority routes.

### Farebox Recovery

The ratio of farebox revenue to operating costs is an important measure of the economic effectiveness of Metro's service. System wide farebox recovery is calculated and monitored monthly. Route level farebox recovery is calculated and monitored quarterly. The farebox recovery for each route type as shown below is based on existing conditions, historical data, comparison with other peer agencies' recovery, productivity and efficiency of operational resource utilization.

Farebox Recovery Guideline			
Route Type	Weekday	Saturday	Sunday
Primary/Core	40%	39%	27%
Secondary	25%	22%	16%
Limited Express	19%	No Service Operated	
Collector Express	21%	No Service Operated	
Community Circulator	7%	8%	8%
School Day Only	26%	No Service Operated	

The farebox data below is from fiscal year 2017-2018, April 1, 2017 to March 31, 2018.

Figure 37 - Farebox Recovery

Route Number	Route Name	Route Designation	Route Type	Weekday Farebox Recovery (actual)	Met?	Saturday Farebox Recovery (actual)	Met?	Sunday Farebox Recovery (actual)	Met?
1	William	Minority	Secondary	29%	Y	18%	N	14%	N
2	Clinton	Non-Minority	Secondary	26%	Y	22%	N	18%	Y
3	Grant	Minority	Primary	51%	Y	40%	Y	31%	Y
4	Broadway	Minority	Primary	30%	N	25%	N	19%	N
5	Niagara	Minority	Primary	38%	N	42%	Y	30%	Y
6	Sycamore	Minority	Primary	23%	N	23%	N	18%	N
7	Baynes/Richmond	Minority	Secondary	17%	N	No Service	N	No Service	N
8	Main	Minority	Secondary	24%	N	14%	N	13%	N
11	Colvin	Minority	Secondary	20%	N	17%	N	12%	N
12	Utica	Minority	Primary	34%	N	32%	N	24%	N
13	Kensington	Minority	Primary	35%	N	26%	N	21%	N
14	Abbott	Non-Minority	Secondary	23%	N	24%	Y	15%	N
15	Seneca	Minority	Secondary	29%	Y	22%	Y	17%	Y
16	South Park	Non-Minority	Secondary	28%	Y	30%	Y	22%	Y
18	Jefferson	Minority	Secondary	21%	N	17%	N	14%	N
19	Bailey	Minority	Primary	44%	Y	35%	N	29%	Y
20	Elmwood	Minority	Primary	35%	N	34%	N	30%	Y
22	Porter/Best	Minority	Secondary	39%	Y	26%	Y	22%	Y
23	Fillmore Hertel	Minority	Primary	37%	N	31%	N	27%	Y
24	Genesee	Minority	Primary	34%	N	23%	N	22%	N
25	Delaware	Minority	Primary	26%	N	25%	N	20%	N
26	Delavan	Minority	Primary	42%	Y	37%	N	24%	N
29	Wohlers	Minority	Secondary	11%	N	No Service	N	No Service	N
32	Amherst	Minority	Primary	26%	N	21%	N	20%	N
34	N. Falls Blvd.	Minority	Secondary	20%	N	18%	N	14%	N
35	Sheridan	Minority	Secondary	13%	N	12%	N	8%	N
40	Grand Island	Minority	Primary	15%	N	15%	N	15%	N
42	Lackawanna	Minority	Secondary	11%	N	7%	N	5%	N
44	Lockport	Non-Minority	Secondary	13%	N	12%	N	9%	N
46	Lancaster	Non-Minority	Secondary	10%	N	9%	N	6%	N
47	Youngs Road	Non-Minority	Secondary	11%	N	No Service	N	No Service	N
48	Williamsville	Non-Minority	Secondary	19%	N	21%	N	18%	Y
49	Millard Suburban	Non-Minority	Secondary	12%	N	No Service	N	No Service	N
50	Main/Niagara	Minority	Secondary	11%	N	12%	N	12%	N
52	Hyde Park	Minority	Secondary	9%	N	9%	N	No Service	N
54	Military	Minority	Secondary	8%	N	10%	N	7%	N
55	Pine Avenue	Non-Minority	Primary	12%	N	20%	N	20%	N
60	Niagara Falls	Non-Minority	Limited Express	14%	N	No Service	Y	No Service	Y
61	N. Tonawanda	Non-Minority	Collector Express	14%	N	No Service	Y	No Service	Y
64	Lockport	Non-Minority	Limited Express	8%	N	No Service	Y	No Service	Y
66	Williamsville	Non-Minority	Collector Express	13%	N	No Service	Y	No Service	Y
67	Cleveland Hill	Non-Minority	Collector Express	15%	N	No Service	Y	No Service	Y
68	George Urban	Non-Minority	Collector Express	11%	N	No Service	Y	No Service	Y
69	Alden	Non-Minority	Collector Express	12%	N	No Service	Y	No Service	Y
70	East Aurora	Non-Minority	Collector Express	10%	N	No Service	Y	No Service	Y
72	Orchard Park	Non-Minority	Collector Express	9%	N	No Service	Y	No Service	Y
74	Boston	Non-Minority	Collector Express	14%	N	No Service	Y	No Service	Y
75	West Seneca	Non-Minority	Collector Express	19%	N	No Service	Y	No Service	Y
76	Lotus Bay	Non-Minority	Collector Express	13%	N	No Service	Y	No Service	Y
79	Tonawanda	Non-Minority	Collector Express	15%	N	No Service	Y	No Service	Y
81	East Side	Minority	Collector Express	24%	Y	No Service	Y	No Service	Y
101	No.-South	Minority	School Day Only	90%	Y	No Service	Y	No Service	Y
102	Bailey	Minority	School Day Only	102%	Y	No Service	Y	No Service	Y
103	E.-Suburban	Non-Minority	School Day Only	35%	Y	No Service	Y	No Service	Y
104	So. Central	Minority	School Day Only	205%	Y	No Service	Y	No Service	Y
106	So.-Suburban	Minority	School Day Only	23%	N	No Service	Y	No Service	Y
110	West-North	Minority	School Day Only	160%	Y	No Service	Y	No Service	Y

111	So.-Michigan	Minority	School Day Only	75%	Y	No Service	Y	No Service	Y
112	Grant-North	Minority	School Day Only	30%	Y	No Service	Y	No Service	Y
145	Metro Rail	Minority	Primary	20%*	N	*	N	*	N
155	NF Trolley	Non-Minority	Community Circulator	1%	N	2%	N	1%	N
204	Airport-Downtown	Non-Minority	Limited Express	6%	N	No Service	Y	No Service	Y
206	Buffalo State	Minority	Community Circulator	6%	N	4%	N	4%	N

\*Number represents total annual farebox recovery. NFTA Metro does not report farebox recovery for rail by day type.

The fiscal year ending in 2018 saw a rise in operating costs due to increases in employee benefits and wages, as well as a decrease in ridership. Because of this, farebox recovery has been lower than in previous years, and many routes have not met the standard. The standards will be evaluated to determine whether they realistically reflect recent farebox recovery trends. Thirteen out of sixteen routes (81%) that met farebox recovery standards this year are minority routes. This is helped in part by the large number of minority school routes, which tend to exceed farebox recovery standards by a significant margin.

### Vehicle Assignment

The NFTA's bus fleet is comprised of several different models but all provide the same passenger amenities, such as air conditioning, wheelchair lifts or ramps and all models are distributed fairly equally between NFTA's three bus garage locations. An APC bus deployment plan was developed to ensure that newer APC buses are statistically assigned to all different routes within each garage. Approximately 85% of the NFTA big bus fleet and 58% of small fleet is equipped with APC technology. Each week the three garages receive a deployment plan to assign different busses on specific routes including minority routes (an example is included in Chapter 9 of this submission). We have found that after reviewing the garage bus assignment logs, minority routes and non-minority routes are equally assigned newer buses.

The following table shows how minority routes are operated among the three NFTA Metro bus garages. Frontier operates the most minority routes and the highest percentage of minority routes, followed by Cold Spring and Babcock garages.

Garage	# Minority Routes	% Minority Routes
Frontier	16	73%
Cold Spring	12	60%
Babcock	11	50%

The table below shows how NFTA bus models are assigned to garages. Many of the newer Nova model buses use compressed natural gas (CNG) and are assigned to Frontier garage out of necessity, as the only garage currently with CNG capabilities. This positively affects minority populations since a large percentage of minority routes are served by Frontier garage. Furthermore, all weekend service is operated out of Frontier garage, which helps to distribute younger buses among all routes. Some of the newest buses purchased (1700B) are diesel in order to more equitably distribute the youngest buses in the fleet.

Figure 38 - Bus Fleet Assignment

6/30/2017					BUS FLEET INFORMATION - 12 YEARS / 500,000 MILES																
BUS INFORMATION					SUB FLEET INFORMATION																
Fleet Designation	Year	Make	Model	Length	Avg % Consumed Useful Life - Age	Avg % Consumed Useful Life - Miles	Average Age/Years	Average Miles	Buses Beyond Useful Life - Age	Buses Beyond Useful Life - Miles	Beyond Useful Life - Age & Miles	Scheduled			Actual			Total # of Buses in Subfleet	Percentage of Fleet		
												Babcock	Cold Spring	Frontier	Babcock	Cold Spring	Frontier				
2000	1999	Nova	LFO85	40'	144%	101%	17.3	505,291	7		13							20	6.1%		
2100A	2004	2004	G18D102N4	40'																	
2100B	2001	Gillig	G18D102N4	40'	129%	99%	15.5	494,037	11		10						21	21	6.4%		
2200A	2002	Gillig	G18D102N4	40'	125%	131%	14.9	657,432			13						13	13	4.0%		
2200B	2002	Gillig	G18D102N4	40'	121%	132%	14.6	661,620	1		11						11	11	3.4%		
2400	2004	Gillig	G29E102R2	30'	130%	138%	13.0	481,882			22	5	5	12	5	5	12	22	6.7%		
2500	2005	Gillig	G29D102N4	40'	101%	81%	12.1	406,340	13			13					13	13	4.0%		
2600	2006	Gillig	G29D102N4	40'	91%	68%	10.9	339,253				30					30	30	9.2%		
2700	2007	Gillig	G30D102N4	40'	82%	75%	9.8	374,090				7	6				7	6	4.0%		
1000A	2010	Gillig	G30D102N4	40'	60%	62%	7.3	309,912						11			11	11	3.4%		
1000B	2010	Gillig	G27D102N4	40'	56%	56%	6.7	281,476				18	30	6			18	30	6	54	16.6%
1000C	2010	Gillig	G27D102N4	40'	52%	59%	6.2	294,315						2			2	2	2	0.6%	
1100A	2011	Gillig	G30D102N4	40'	51%	41%	6.1	203,184						24			24	24	7.4%		
1100B	2011	Gillig	G30D102N4	40'	50%	39%	6.0	193,109						5			5	5	1.5%		
1100C	2011	Gillig	G27D102N4	40'	51%	37%	6.1	185,982						1			1	1	0.3%		
1200A	2012	Gillig	G30D102N4	40'	43%	35%	5.1	173,144				12	1				12	1	1	13	4.0%
1200B	2012	Gillig	G27D102N4	40'	43%	27%	5.1	136,381						1			1	1	1	0.3%	
1300	2013	Gillig	G27D102N4	40'	33%	37%	4.0	184,166												4	1.2%
1500	2015	Nova Bus	LFS 40	40'	10%	11%	1.2	55,269						20			20	20	20	6.1%	
1600	2016	Nova Bus	LFS 40	40'	8%	9%	0.9	43,723						24			24	24	24	7.4%	
1700A	2017	Nova Bus	LFS 40	40'	8%	9%	0.1	15,848						16			16	16	16	4.9%	
1700B	2017	Nova Bus	LFS 40	40'	0%	0%	0.1	3,328						8			8	8	8	2.5%	

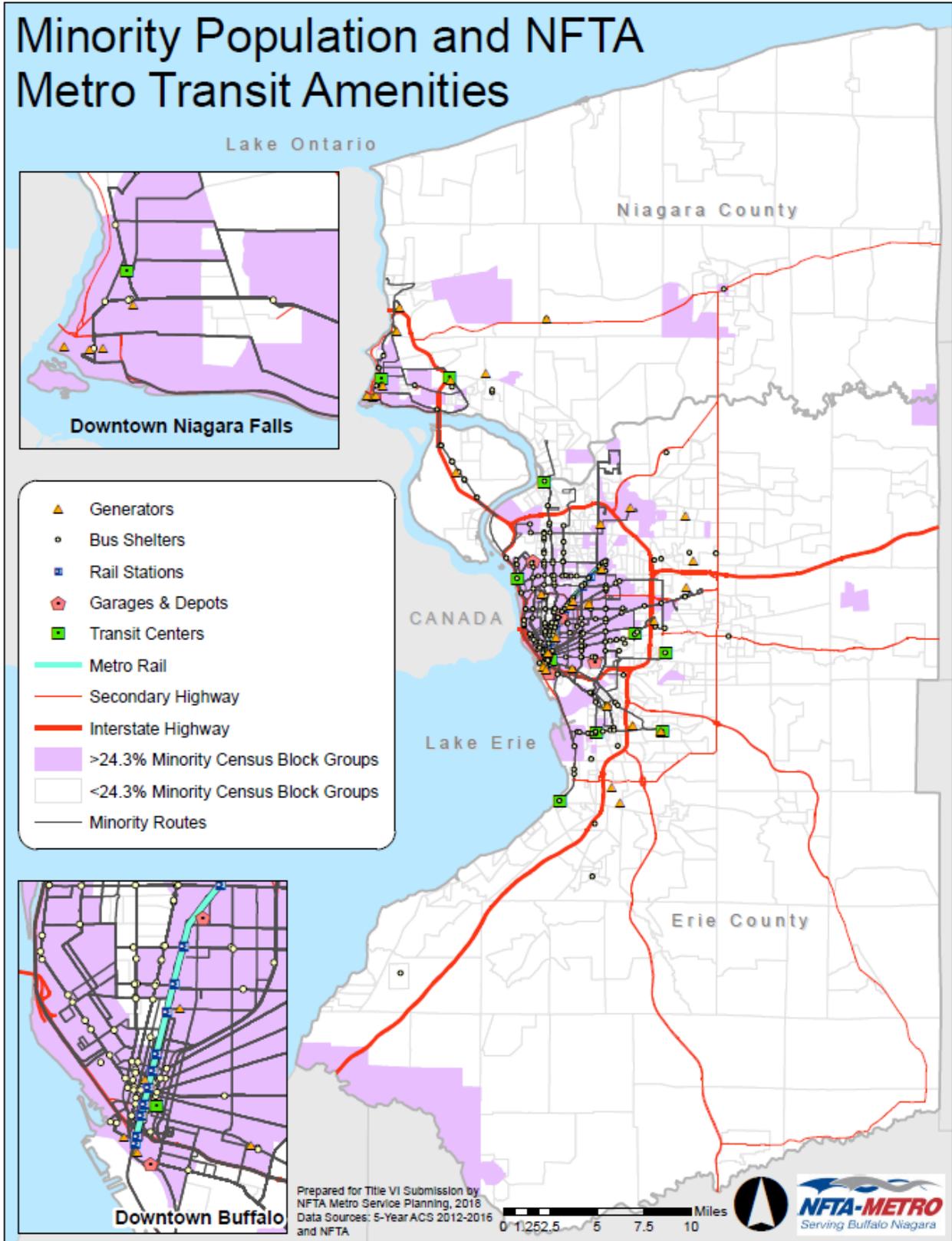
**Transit Amenities**

**Requirement:** *Transit providers shall evaluate their transit amenities policy to ensure amenities are being distributed throughout the transit system in an equitable manner.*

The NFTA does not have the authority to site transit amenities such as benches and trash receptacles on property other than their own. It is the practice of NFTA to put such amenities at stops where shelters are located. NFTA's Bus Shelter Placement Policy, adopted in 2008 is included in Chapter 9 of this submission. In addition to amenities at bus shelters, NFTA places benches and trash receptacles at each rail station, both under and above ground. Underground rail stations have escalators and an elevator.

The following map shows the NFTA Metro service area, including all minority routes and minority census block groups, overlaid with transit amenities, including bus shelters and transit centers.

Figure 39 - Minority Population and NFTA Transit Amenities



## **Policy for Monitoring Transit Service**

***Requirement:*** *Transit providers shall develop a policy or procedure to determine whether disparate impacts exist on the basis of race, color, or national origin, and apply that policy or procedure to the results of the monitoring activities.*

### **Service Monitoring & Evaluation Timeline**

Transit service evaluation is ongoing and continuous. The following evaluation process timeline is designed to provide direction to service planning and coordinate the process with other organizational planning, such as the budget process.

Data collection and monitoring - Continuous

June –August - Performance Evaluation

October - Annual Performance Report

### **FTA Title VI Adherence**

Metro’s planning process is sensitive to the needs of minority communities. As a federally funded transit provider, through the Federal Transit Administration, Metro has a responsibility to adhere to the objectives of Title VI of the Civil Rights Act of 1964. The objectives of the FTA Title VI program are as follows:

- To ensure FTA-assisted benefits and related services are equitably distributed without regard to race, color or national origin.
- To ensure that both the level and quality of transit services provide equal access and mobility for any person without regard to race, color or national origin.
- To ensure that access to the planning and decision-making process is open and without regard to race, color or national origin
- To ensure that decisions on the location of transit facilities and services are made without regard to race, color or national origin.

These objectives are the basis for the implementation of the FTA Title VI program. To comply with these objectives, Metro has adopted the suggested methodology and framework set forth in the Title VI reporting guidelines (FTA Circular 4702.1B, Chapter IV) for compliance assessment.

By using this methodology, Metro will monitor and compare performance of all its routes based on level of service and quality of service criteria. To facilitate this evaluation, Metro will continue to collect data relating to its service standards, such as load factor, vehicle assignment, frequency, and on time performance. These analyses will be conducted on a route-by-route basis, thus enabling a system-wide evaluation. The findings of these analyses will be used to modify service delivery, to bring it in line with the stated objectives of the Title VI program, where a variance exists. Metro has submitted a report to FTA which documented the results of this methodology and showed Metro’s compliance with the Title VI regulations. The FTA approved the current Title VI program on March 3, 2016.

On July 26th, 2018 NFTA staff presented the Title VI Program Update and reported the results of the monitoring program to the Board of Commissioners. The results show that there are no disparate impacts in service between minority and non-minority routes. The Board of Commissioner reviewed and authorized for submission this Title VI Program – 2018 Update.

Figure 40 - Results of the Monitoring Program

Route Type	Service Span – Weekday (Hours)*	Service Frequency – Peak (Mins)	Passenger Per Revenue Hour – Weekday	On-Time Performance	Average Bus Stop Spacing (miles)
Minority	17.9	28	28	85%	.16
Non-Minority	17.1	41	15	79.5%	.41

Regular Meeting  
July 26, 2018

**SURFACE:**

4. C. (1) **Authorization to Adopt the NFTA Title VI Program and Authorize Submission to the Federal Transit Administration (FTA)**

**RECOMMENDATION:** Staff recommends that the Board authorize:

- (1) The adoption of the Niagara Frontier Transportation Authority (NFTA) Title VI Program – 2018 Update, which is based on a review of the analysis and monitoring program of service standards and policies; and
- (2) The submission of such updated program to the Federal Transit Administration (FTA). The Executive Summary of such updated program is attached hereto and a full copy of such updated Title VI Program has been made available to the Board for review prior to this meeting.

**INFORMATION:** As a federally-funded and regulated transit provider, through the FTA, the NFTA has a responsibility to adhere to the letter and spirit of Title VI of the Civil Rights Act of 1964 as well as the policies set forth in the Executive Order on Federal Actions to Address Environmental Justice (EJ) in Minority Populations and Low-Income Populations (1994).

The FTA requires that each recipient of FTA funding prepare an update to its Title VI program, in order to evidence its compliance with the Department of Transportation's Title VI regulations, and submit such updated Title VI program, together with analysis of the monitoring program of service standards and policies, to its FTA regional civil rights officer once every three years or as otherwise required by the FTA. Each recipient of FTA funding is required to have its board of directors (or applicable governing body) approve the adoption of such updated plan and authorize its submission to FTA.

The NFTA Title VI Program – 2018 Update addresses, in detail, the NFTA's compliance with the following legal requirements imposed by Title VI of the Civil Rights Act of 1964: (i) notification to beneficiaries of protection under Title VI, (ii) procedures for investigating and tracking complaints as well as related complaint forms, (iii) documentation and recordkeeping with respect to Title VI investigations, complaints and lawsuits, (iv) promoting early and continuous inclusive public participation opportunities, (v) meaningful access to Limited English Proficiency (LEP) individuals, (vi) minority representation on planning and advisory boards, (vii) sub-recipient assistance and oversight, (viii) determination with regard to site of location of facilities, (ix) system-wide service standards and policies, (x) collection and reporting of demographic data, (xi) monitoring programs of transit service, and (xii) evaluation of service and fare changes. The NFTA Title VI Program – 2018 Update also reflects certain statistics and maps relating to, among other things, ethnicity and household income trends, minority concentrations, passenger loads and on-time data.

Staff proposes to submit the updated Title VI Program – 2018 Update, in its entirety, in compliance with FTA Circular 4702.1B (October 1, 2012), promptly following the Board's authorization.

SURFACE 4. C. (1)

**FUNDING:** No funding is required.

**“RESOLVED,** that the Board hereby adopts the NFTA Title VI Program, as described above, and authorizes a copy of the full report be submitted to the FTA.”

SURFACE 4. C. (1)

## Chapter 12: Evaluate Service and Fare Changes

***Requirement: This requirement applies only to transit providers that operate 50 or more fixed route vehicles in peak service and are located in a UZA of 200,000 or more in population or that otherwise meet the threshold in the Introduction section of this chapter. These transit providers are required to prepare and submit service and fare equity analyses as described below. Transit providers not FTA C 4702.1B Chap. IV-11 subject to this requirement are responsible for complying with the DOT Title VI regulations which prohibit disparate impact discrimination, and therefore should review their policies and practices to ensure their service and fare changes do not result in disparate impacts on the basis of race, color, or national origin.***

***To further ensure compliance with 49 CFR Section 21.5(b)(2), 49 CFR Section 21.5(b)(7), and Appendix C to 49 CFR part 21, all providers of public transportation to which this Section applies shall develop written procedures consistent with this Section 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.***

### **Response:**

NFTA has established a major service change policy, disparate impact policy and disproportionate burden policy. The major service change policy was adopted by the NFTA board in March 2012 and reaffirmed in April 2014, a copy of which is included in this chapter.

#### Service Changes

Since the last submission, NFTA has not made any major services changes as defined in the major service change policy. However, NFTA completed the Erie and Niagara County Service Plan in August 2016. The plan recommended 55 proposed route changes based on productivity and financial effectiveness, 18 of which would qualify as a "major service change." To accompany the plan and to be in compliance with Title VI, an analysis was completed. The analysis concluded 9 of the 18 recommended major service changes would result in a disparate impact and/or disproportionate burden. NFTA listed the alternatives for each service change resulting in a disparate impact or disproportionate burden. NFTA found that the majority of impacted riders would still have access to transit service as many of the eliminated routes duplicated other services. NFTA also highlighted the eliminated segments that were not close to another route. These segments were unproductive and generated minimal ridership. Some of the savings from these changes will be reinvested in the core network, where transit can serve a higher number of passengers. These service changes have been analyzed but not yet been implemented.

Minor service changes have been made since the last submission and include:

Route 11 – A portion of Route 11 Colvin was rerouted from Colvin Ave to Delaware Ave to avoid potential conflicts between the height of CNG buses and the clearance of a railroad overpass bridge on Colvin Ave.

Routes 1, 2, 4 – Due to changes made to a contract with intercity bus providers, bus bays were vacated at NFTA's Metropolitan Transpiration Center (MTC) for fixed route operation. Routes 1, 2 and 4 were rerouted from their previous layover location (with only a shelter) to layover at the MTC. The new

location allows for passengers to have access to a safe, comfortable, indoor waiting area with amenities and restrooms as well as access to real time information.

Routes 16, 36 and 42 - In response to frequent complaints from Lackawanna residents about lack of evening and weekend service, changes were made to the spring 2018 schedule to alter service delivery in this community. Blasdell and Hamburg were also affected by these changes. In order to provide additional service on evenings and weekends to Lackawanna, service was reallocated between three routes that serve this community. We were able to identify redundancies in service, eliminating a route (36), while not losing geographic coverage (by providing service with routes 16 and 42). Service to this area on Sunday is being delivered as a pilot, where we are seeking at least 10 passengers per revenue hour in order to continue this service after a six-month window.

Community meetings were held for each minor service change and are outlined in Chapter 4 – Promoting Inclusive Public Participation.

### Fare Changes

NFTA did not have any fare changes since the last Title VI submission. However, NFTA is currently upgrading its fare collection system requiring a new fare policy to introduce new fare media and eliminate some existing fare media as part of the new fare structure. A Fare Equity Title VI analysis was conducted in order to ensure that the proposed changes do not result in a disparate impact on the basis of race, ethnicity, or national origin or a disproportionate burden on low income households.

The fare equity analysis detailed the existing fare structure, the proposed fare structure, and the differences between the two. NFTA will introduce two key fare media into the system: smart cards and mobile ticketing. This new technology provides many benefits to both passengers and the transit agency. Additionally, NFTA is moving away from more inefficient methods of payment, primarily on-board day pass sales and tokens.

Based on this analysis, minority and low-income passengers used NFTA's fare media at rates similar to the total population of riders. The differences in usage rates were not large enough to trigger the threshold set by the NFTA policy (20 percentage point difference for minority or low-income riders compared to the system average).

However, in order to ensure that the transition is seamless, NFTA will automatically give passengers the best value and upgrade them to a day pass after three or more trips in one day when using stored value. Passengers can manage stored value using a number of alternatives: TVMs, retail outlets, the internet, and mobile ticketing. The distribution of these retail outlets was analyzed to ensure that minority and low-income residents had equal access to these locations. Three (out of how many?) census tracts with an above-average rate of minority residents were more than a ½ mile away from a retail outlet. However, each of these tracts were located outside of NFTA's service area.

As a result, this fare equity analysis concludes that the transition to new fare technology will not result in a disparate impact to minority riders or a disproportionate burden to low-income passengers. The full analysis is included at the end of this chapter.

NFTA Board of Commissioners authorized staff to solicit public comment and two public hearings were held regarding the new fare structure (board resolution included). The two public hearings were held on August 31 and September 1, 2016. They were attended by 55 individuals and public officials (8 attendees in Niagara Falls and 47 attendees in Buffalo). Fare System Upgrade public hearing notifications and ads were published in the Buffalo News, Buffalo Criterion, and Niagara Gazette during the week of 7/30/16.

A total of 1.5 hours of public testimony were received and recorded during the two public hearings with 12 speakers and 4 written comments submitted. Metro received, documented and responded to 10 emails and one resolution during the comment period.

After the public comment period, staff recommended the fare policy to the Board of Commissioners which was adopted in October 2016, a copy of the resolution is attached.

**THE SOLICITING OF PUBLIC COMMENT AND CONDUCTING  
A TITLE VI SERVICE AND FARE EQUITY ANALYSIS  
ON TRANSIT SERVICE AND FARE CHANGES**

**Adopted by the Board of Commissioners March 26, 2012  
Reaffirmed by the Board of Commissioners April 24, 2014**

NFTA policy is to disseminate information and to solicit and respond to public comment on bus/rail service and fare changes to the extent reasonable and practical. Specific elements of this policy are as follows:

1. Except when impossible because of an emergency condition, advance notice of not less than one week will be given to the affected public of minor route and schedule changes. Methods of providing such notice include but are not limited to distribution of revised timetables, handouts, posted notices and/or media releases. In addition, one month's advance notice of any permanent route change will be provided to the chief elected official of any affected local government entity, if possible.

2. Major Service changes or any change in the fare structure will be submitted to the NFTA Board prior to any public discussion or implementation. A major service change for big bus or rail service is defined as a change or changes in any route other than a school tripper route 1) that increases or decreases the number of daily bus or rail car trips on any route by 25% or more, 2) changes the permanent length of a route by 25% or more, or 3) is otherwise considered by staff as having significant impact on our riders. A major service change for MetroLink service is defined as a change or changes 1) that impact 5% or more of Metro's overall fixed route bus and rail annual service hours, or 2) is otherwise considered by staff as having significant impact on our riders.

3. If a major service change involves a reduction in service, or a change in fares is proposed, the NFTA Board will be requested to authorize a formal solicitation of public comment. A notice of the proposed change(s) will be published in a newspaper of general circulation and also, if applicable, in newspapers oriented to the specific groups or communities affected and in buses and rail cars. Such published notices will include information as to the date, time and location of any public hearings. Not sooner than thirty days after the notices are published and posted at least one public hearing shall be held. Special promotional fares are not included in the requirements of this section.

4. Staff will conduct a Service and Fare Equity Analysis required by FTA for compliance with Title VI of the Civil Rights Act of 1964 to assess the effects of a proposed fare or major service change on minority and low-income populations during the planning of such changes. The Service and Fare Equity Analysis will also apply the Disparate Impact threshold and the Disproportionate Burden threshold to the major service changes or changes in fares as follows:

- A. Title VI Disparate Impact Policy – A twenty percent (20%) threshold above which an impact will be deemed “a statistically significant disparity.” If the percentage difference between the minority population affected by the service or fare change more than twenty percent (20%) above the minority population of the overall service area, a disparate impact exists.

- B. Environmental Justice Disproportionate Burden Policy – A twenty percent (20%) threshold above which an impact will be deemed “a statistically significant disparity.” If the percent difference between low-income population affected by the service or fare change is more than twenty percent (20%) above the low-income population of the overall service area, a disproportionate burden exists.

The Analysis will also address alternatives available for people affected by the changes. The results of the Analysis will be reported to the NFTA Board prior to any public discussion or implementation of the proposed changes.

5. Staff will consult with private operators as required by NFTA policy on new and restructured service. Such consultation will occur after the proposal is submitted to the NFTA Board but prior to securing final Board approval. A report of the results of the consultation shall be given to the NFTA Board.

6. A report of all public comments received and the responses given, as well as the results of the consultation with private operators will be given to the Board. Recommended changes in the proposal as a result of public comment or the consultation with private operators may also be presented.

7. Following completion of the process described in paragraphs 2 through 6 above, the NFTA Board may authorize staff to implement the changes or may direct other action. Final public notice of major changes in service or any changes in the fare structure will be given by the methods stated in paragraph 1 above, at least ten days in advance of the effective date of the change.

8. Appropriate Erie County officials will be notified of any change that either eliminates a bus route or reduces service on a route by more than 10%, as required by the agreement between NFTA and Erie County.

Regular Meeting  
July 28, 2016

**SURFACE:**

**4. D. (1) Authorization to Solicit Public Comment on Proposed Fare Structure and Approve Title VI Fare Equity Analysis**

**RECOMMENDATION:** Staff recommends that the Board authorize Staff to conduct a public hearing to solicit public comments on the proposed Fare Structure. In addition, Staff is requesting that the Board approve the Title VI Fare Equity Analysis that was completed on the proposed Fare Structure. Based on the findings of the Title VI Analysis, the proposed Fare Structure does not result in any disparate impacts.

**INFORMATION:** NFTA Metro is in the process of upgrading the fare collection system. In June of 2015, the Board authorized a contract with Scheidt & Bachmann to design and implement the new fare collection system. The fare collection system upgrade will result in a change in NFTA Metro's current fare structure to incorporate new fare media and changes in how passengers access public transit vehicles and facilities.

Completion of a Title VI analysis of the proposed fare structure was completed to evaluate any disparate impacts of the action on our community. Staff is requesting the Board also approve the Title VI Fare Equity Analysis on the proposed fare structure, as no disparate impacts were found. Copies are available of the final detailed Title VI analysis on our website. Hard copies are available for review upon request and will be available at the public hearings.

In order to comply with NFTA's Policy regarding public engagement Staff is recommending that two (2) public hearings be advertised and conducted during the week of August 29, 2016 to receive comments on the proposed fare structure.

Hearings will be held in Erie County and in Niagara County. Specific dates, time and location to be determined.

Comments will also be solicited on Metro's website, and written comments will be accepted. Staff will report the results of the public hearing process to the Board in October 2016.

**FUNDING:** No funding is required.

**"RESOLVED,** that the Board hereby approves the Title VI Fare Equity Analysis completed with respect to the proposed Fare Structure; and

**BE IT FURTHER RESOLVED,** that the Board hereby authorizes Staff to conduct public hearings to solicit public comment as set forth hereinabove."

SURFACE 4. D. (1)

# Erie and Niagara County Service Plan Title VI Analysis

August 2016



Prepared by:  
**TMD**  
TRANSPORTATION MANAGEMENT  
& DESIGN, INCORPORATED

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## Purpose and Background

The Federal Transit Administration (FTA) Office of Civil Rights conducts periodic reviews of sub recipients, such as Niagara Frontier Transportation Authority (NFTA), to determine whether they are honoring their commitment to Title VI of the Civil Rights Act (49 USC 5332).

Title VI of the Civil Rights Act of 1964 ensures that “no person in the United States shall, on the basis 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.” NFTA Metro, as a sub recipient has committed to the FTA’s Title VI objectives set forth in Circular 4702.1 ensuring that FTA-assisted benefits and related services are made available and are equitably distributed without regard to race, color or national origin.

This analysis was conducted in compliance with FTA’s Circular 4702.1B that was issued on October 1, 2012 and 49 CFR Section 21.9(b), to ensure that the *Erie and Niagara County Service Plan* service recommendations comply with Title VI requirements.

The *Erie and Niagara County Service Plan* was designed to improve NFTA service performance by:

- Improving service delivery quality and efficiency;
- Better tailoring of service to current and future market demand and key destinations;
- Reinvesting resources currently allocated to low performing service;
- Identifying lower cost service delivery options; and
- Redevelop the commuter network around new Park and Ride intercept locations.

## NFTA Service Equity Policies

The service equity analysis will use the following policies and thresholds to assess the impacts of the proposed fixed route service changes.

### Definition of Major Service Changes

Title VI policies require review of any service reductions or additions considered by the agency to be a “major service change.” NFTA Metro defines a major service change as the substantial reduction of the amount of service on a bus route, representing more than 25 percent of the route service hours or service miles. Any changes in transit fares or fare structure are also considered to be a major change requiring review.

Disparate impact and disproportionate burden policies establish a threshold which identifies when the adverse effects of a major service change are borne disproportionately by minority or low-income populations, respectively.

## Disparate Impact Policy

NFTA recommends twenty percent (20%) as the threshold above which an impact is deemed “a statistically significant disparity.” This means that if the percentage difference between the minority population affected by the service or fare change is above twenty percent (20%) than the minority population of the overall service area, a disparate impact exists.

Should a proposed major service or fare change result in a disparate impact, NFTA will consider modifying the proposed change to avoid, minimize, or mitigate the disparate impact of the change. If NFTA finds potential disparate impacts and then modifies the proposed changes to avoid, minimize, or mitigate potential disparate impacts, NFTA will reanalyze the proposed changes to determine whether the modifications actually removed the potential disparate impacts of the changes.

## Disproportionate Burden Policy

NFTA recommends twenty percent (20%) as the threshold above which an impact is deemed “a statistically significant disparity.” This means that is the percent difference between low-income population affected by the service or fare change is above twenty percent (20%) than the low-income population of the overall service area, a disproportionate burden exists.

Should a proposed major service or fare change result in a disproportionate burden, NFTA will consider modifying the proposed change to avoid, minimize, or mitigate the disproportionate burden of the change. If NFTA finds a potential disproportionate burden and then modifies the proposed changes to avoid, minimize, or mitigate potential disproportionate burdens, NFTA will reanalyze the proposed changes to determine whether the modifications actually removed the potential disproportionate burden of the changes.

## Proposed Fixed Route Service Changes

In order to increase ridership (have existing riders ride more often and attract new riders) as well as improve performance to meet NFTA’s Service Standards Policies, the *Erie and Niagara County Service Plan* proposes to increase the frequency on successful routes, restructure routes to better serve current and future market demand and key destinations, introduce new limited service, and eliminate unproductive and duplicative routes. The following chart illustrates the near term route level changes.

Table 1: Proposed Service Changes

No.	Route Name	Description
1	William	Consistent 30-minute off peak service to Goethe Loop & peak service to Appletree Business park
2	Clinton	Streamlined service, where Longline trips will travel north along Transit Road serving more commercial destinations
3	Grant	A segment north of Ontario street to operate in a loop around Skillen Street, Vulcan Street, Kenmore Ave and Ontario Street
4	Broadway	Connecting high demand destinations and no service to Harlem Road, Gierlach Street, Crocker Street, Reiman Street and Halstead Ave
5	Niagara-Kenmore	Consistent 10-minute peak service and 15-minute off peak service
6	Sycamore	No service to Thruway Mall, western terminus changed to NFTA Transit Center on Division Street
7	Baynes-Richmond	Route discontinued
8	Main	Bidirectional service along Washington Street with consistent 30-minute service
11	Colvin	Bi-directional service on Franklin Street with consistent 30-minute service
12	Utica	10-minute peak service and 15-minute off peak service
13	Kensington	Retain current level of service
14	Abbott	30-minute service along short line and 60-minute service along long line
15	Seneca	Will travel north from Church Street along Delaware Street with 15-minute peak service and 30-minute off peak service.
16	South Park	30-minute Short line service between McKinley Mall and downtown Buffalo and 60-minute long line service between Hamburg and downtown Buffalo
18	Jefferson	Off peak frequency increased to every 30 minutes
19	Bailey	Consistent 10-minute peak service and 15-minute off peak service
20	Elmwood	Service divided into short line (every 10 minute) and long line (every 30 minutes)
22	Porter-Best	15-minute peak service and 30-minute off peak service

No.	Route Name	Description
23	Filmore-Hertel	10-minute peak service and 15-minute off peak service, 30-minute service on weekends
24	Genesee	15-minute service to Andrews Loop and 30-minute service to Buffalo Airport
25	Delaware	Bi-directional service on Franklin Street with consistent 30-minute service
26	Delavan	15-minute service throughout the day
29	Wohlers	Route discontinued
32	Amherst	15-minute peak and 30-minute off peak service, no service to Buffalo State
34	Niagara Falls Blvd	Consistent 30-minute service throughout the day, no deviation to Boulevard Mall and Amherst Development Park
35	Sheridan	Consistent 60-minute service & realigned to serve Riverside Community
36	Hamburg	Route discontinued
40	Buffalo-Niagara Falls	More direct service between Niagara Falls and downtown Buffalo by removing deviation along John Daly Blvd, Niagara Street and 3 <sup>rd</sup> Street
42	Lackawanna	Route extended and consistent 60-minute service throughout the day
44	Lockport	Consistent 60-minute service throughout the day
46	Lancaster	Unproductive deviation to Harlequin Books and Buffalo Depew Amtrak Station removed. Consistent 60-minute service throughout the day
47	Youngs	Route discontinued
48	Williamsville	Route extended to serve Walmart and will have consistent 30-minute service
49	Millard	Route discontinued
50	Main-Niagara	Retooled to serve East-West oriented service with consistent 30-minute service throughout the day
52	North End Circulator	Redesigned as a community circulator and will operate in a bidirectional loop with consistent 40-minute frequency
54	Military	Route discontinued
55	Pine Ave	30-minute service along short line and 60-minute service along long line
60	Niagara Falls	Inbound trips increased to three per day and will also serve the Transit Center at Ontario Street and Niagara Street

No.	Route Name	Description
61	North Tonawanda	Direct service between North Tonawanda and downtown Buffalo, will offer four inbound and four outbound service
66	Williamsville	Route discontinued
67	Cleveland hill	Route discontinued
68	George Urban	Route discontinued
69	Alden	No service to Alden Community Church, three inbound & outbound trips
70	East Aurora	Route discontinued
72	Orchard Park	Trip type P and trip type A will be eliminated, it will have two inbound and two outbound trips.
74	Hamburg	No service to North Boston, will have four inbound and four outbound trips
75	West Seneca	Route discontinued
76	Lotus Bay	Will have four inbound trips and four outbound trips
79	Tonawanda	Route discontinued
81	Eastside	Route discontinued
204	Airport-Downtown	Will retain current level of services with 12 inbound and 12 outbound trips
206	Buffalo State-Wegmans	Will retain current level of services with five inbound and five outbound trips
15L	Seneca	A peak hour overlay service of Route 15 with 12-minute frequency
48L	Williamsville	20-minute peak hour frequency limited stop service with four inbound and outbound trips

## Major Service Changes

NFTA defines a “Major Service Change” as a reduction in vehicle revenue hours of 25 percent or more. Table 2 identifies the routes that triggered a major service change and need to be assessed for possible Title VI impacts.

*Table 2: Routes with Proposed Major Service Changes*

Route	Route Name	Change
Route 7	Baynes-Richmond	Route discontinued
Route 25	Delaware	Alignment and frequency change
Route 29	Wohlers	Route discontinued
Route 34	Niagara Falls Blvd.	Alignment and frequency change
Route 36	Hamburg	Route discontinued
Route 47	Youngs Road	Route discontinued
Route 49	Millard Suburban	Route discontinued
Route 50	Main-Niagara	Alignment and frequency change
Route 54	Military	Route discontinued
Route 55	Pine Avenue	Frequency change
Route 66	Williamsville	Route discontinued
Route 67	Cleveland Hill	Route discontinued
Route 68	George Urban	Route discontinued
Route 70	East Aurora	Route discontinued
Route 72	Orchard Park	Trip pattern discontinuation; frequency change
Route 74	Hamburg	Service area discontinuation; frequency change
Route 75	West Seneca	Route discontinued
Route 79	Tonawanda	Route discontinued

## Service Equity Analysis

The service equity analysis utilized the most recent US Census demographic data<sup>1</sup> to understand how minority and “in poverty” populations were distributed across the service area. Maps 1 and 2 depict the current weekday network, the routes with proposed major service reductions, and their proximity to Title VI populations. The maps identify the census tracts where the total minority or “in poverty”<sup>2</sup> populations are greater than the average for the service area.

Table 3: Service Area Demographics

Demographics for Service Area <sup>3</sup>	
Population Served	1,025,110
Minority Population Served	242,031
In-Poverty Population Served	150,438
Census Tracts Served	266
Minority %	23.6%
Poverty %	14.7%

The proposed service changes occur in both Erie and Niagara Counties. However, most of the discontinued routes are located in less productive suburban or outlying areas. NFTA is maintaining service in the more productive, urban core network, where higher concentrations of minority and “in-poverty” populations reside.

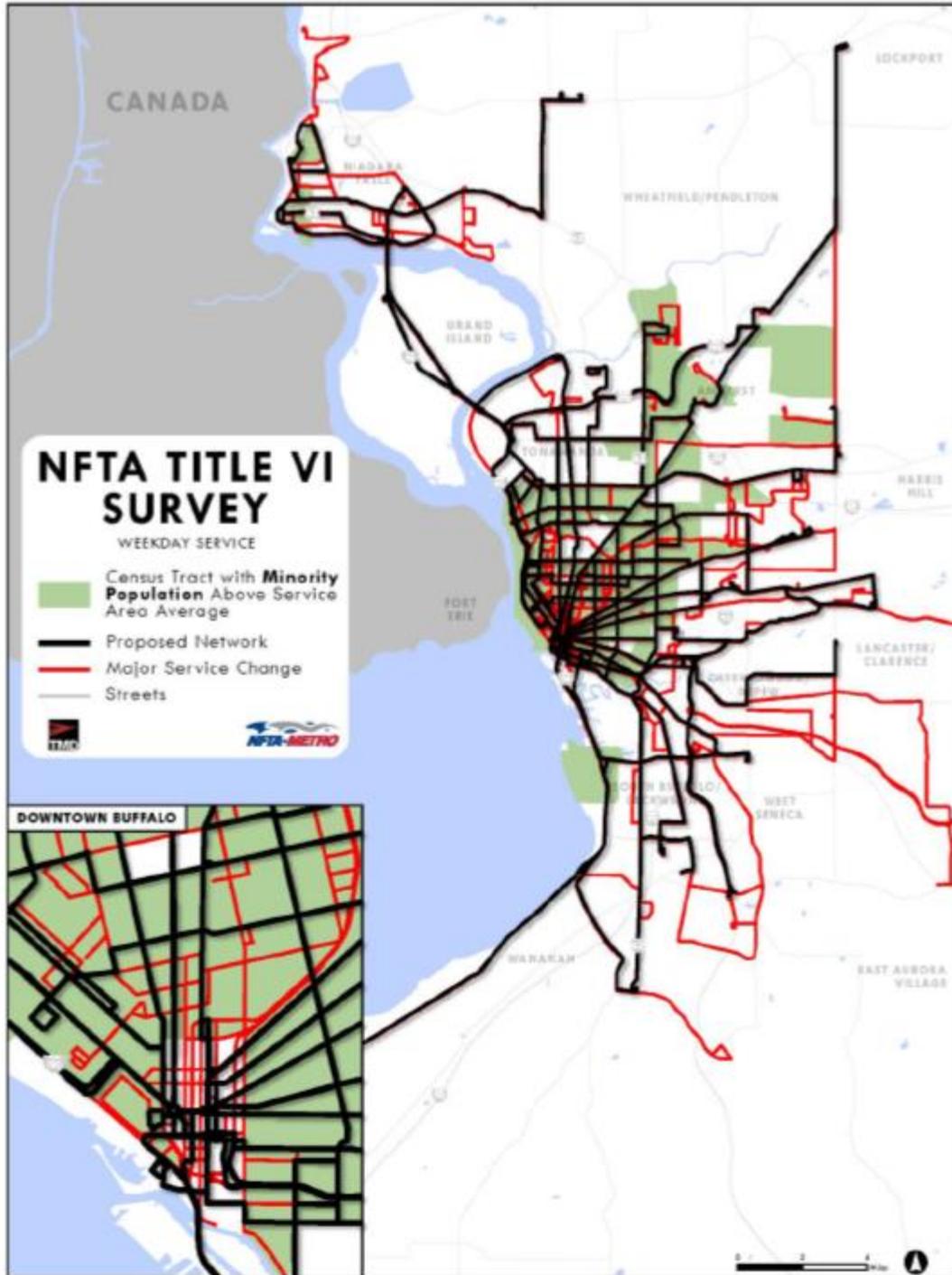
The equity analysis analyzed demographic information from the US Census as well as the information from the 2012 On-Board Passenger Survey to identify whether the major service changes resulted in a disparate impact or disproportionate burden. NFTA looked at Title VI implications based on the type of service change and by route.

<sup>1</sup> 2013 American Community Survey 5-Year Estimates data was used to determine minority and “in poverty” populations.

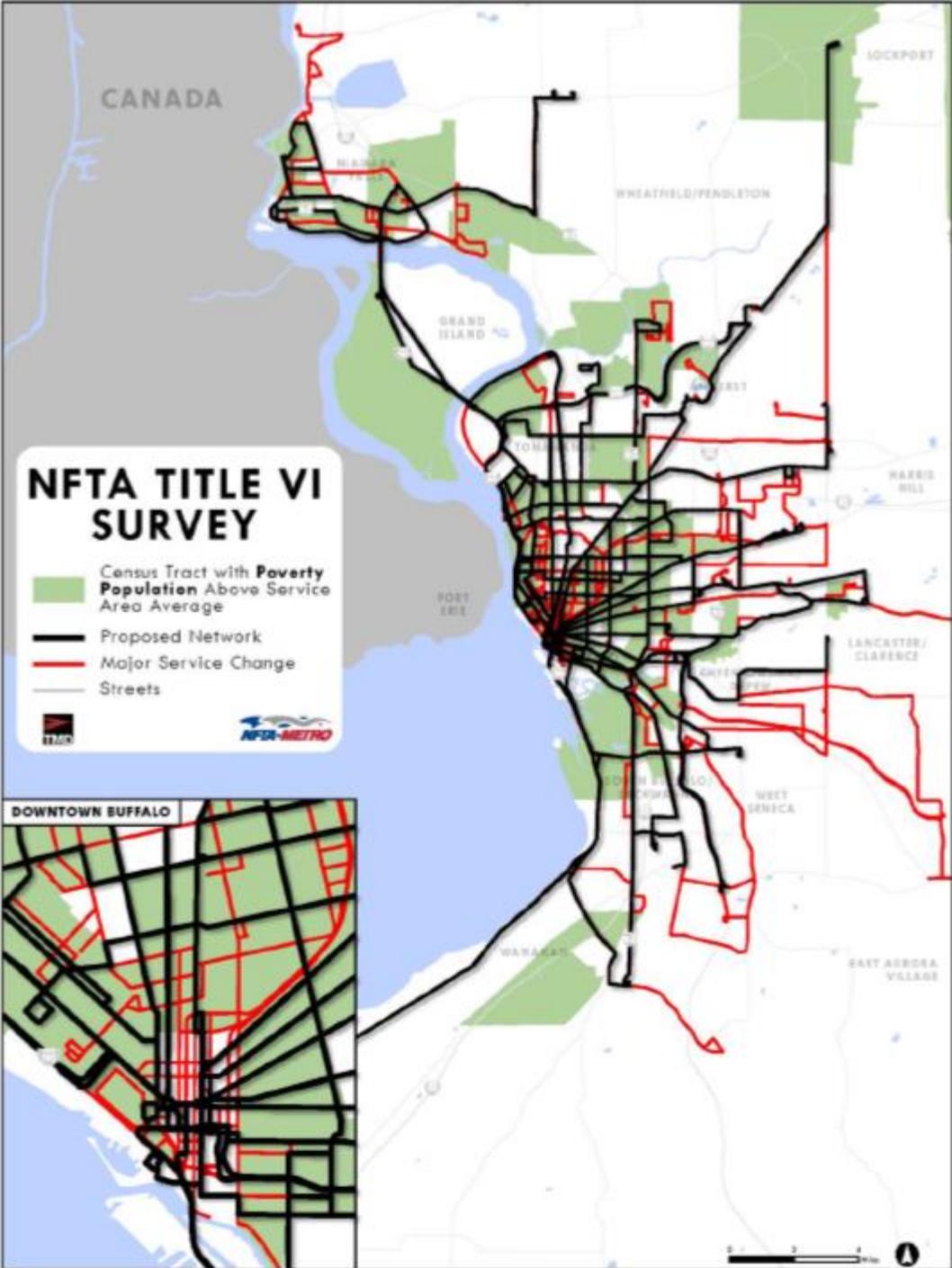
<sup>2</sup> US Census defines low-income populations as “in poverty.”

<sup>3</sup> Census tract data within ¼ mile from existing route

Map 1: Proposed Network Impacts and Above Average Minority Census Tracts



Map 2: Proposed Network Impacts and Above Average Poverty Census Tracts



## Discontinued Routes

The table below summarizes the demographic information for the routes that NFTA is proposing to discontinue. These are some of the lowest performing routes in the network. According to the NFTA service equity policy, a disparate impact or disproportionate burden would occur if a cancelled route served an area where the concentration of minority or low-income residents was 20 percent greater than the system average. The NFTA service area averaged 23.6 percent minority residents and 14.7 percent low-income residents. Based on these system averages, any discontinued route that operated in an area with a concentration of minority residents greater than 28.3 percent resulted in a disparate impact. Any route that operated in an area with a concentration of low-income residents greater than 17.6 percent resulted in a disproportionate burden.

Among the cancelled routes, Routes 7, 29, 54, 66, 67, 68, and 79 crossed the thresholds for a disparate impact and or disproportionate burden, warranting additional review to determine possible service alternatives or mitigation measures.

On average, discontinued routes operated in areas where 40.4 percent of the residents were minorities and 21.0 percent were low-income, both above the system averages.

*Table 4: Demographics for Discontinued Routes – Census Data*

Route	Population	Poverty	% in Poverty	Minority	% Minority
Route 7	86,622	28,511	32.9%	48,995	56.6%
Route 29	71,554	23,458	32.8%	51,502	72.0%
Route 36	86,680	15,112	17.4%	20,930	24.1%
Route 47	72,179	7,997	11.1%	16,630	23.0%
Route 49	103,539	9,504	9.2%	23,639	22.8%
Route 54	43,543	11,400	26.2%	13,926	32.0%
Route 66	211,675	39,550	18.7%	96,743	45.7%
Route 67	156,108	41,023	26.3%	94,854	60.8%
Route 68	152,850	38,421	25.1%	87,055	57.0%
Route 70	135,680	20,062	14.8%	24,836	18.3%
Route 75	97,530	16,533	17.0%	21,646	22.2%
Route 79	146,216	34,535	23.6%	50,657	34.6%
<b>Discontinued Routes</b>	<b>1,364,176</b>	<b>286,106</b>	<b>21.0%</b>	<b>551,413</b>	<b>40.4%</b>

NFTA also reviewed data from the passenger survey to supplement the census-based analysis with demographic findings from a transit-specific source. The survey data is important, because it provides more direct insights into how the proposed changes impact Title VI passengers. According to the rider survey, about 64 percent of NFTA passengers were minorities. Given this average, only one route proposed for cancellation had a rate of minority passengers greater than 20 percent of the system average, Route 29.

Nearly 70 percent of NFTA passengers were low-income. Among the discontinued routes, none served a proportion of low-income riders that exceeded the threshold for a disproportionate burden, 83 percent.

Overall, the routes recommended for discontinuation served minority and low-income passengers at rates lower than the system average.

*Table 5: Race and Ethnicity Data for Discontinued Routes – Passenger Survey<sup>4</sup>*

Route	Minority	Total	Minority Percent
Route 7	188	326	57.8%
Route 29	142	155	91.9%
Route 36	342	688	49.7%
Route 47	319	506	62.9%
Route 49	76	129	58.9%
Route 54	82	121	67.9%
Route 66	19	97	19.6%
Route 67	42	68	61.7%
Route 68	4	22	20.0%
Route 70	6	62	10.0%
Route 75	36	65	55.6%
Route 79	3	28	11.8%
Discontinued Routes	1,260	2,266	55.6%
System	55,900	87,579	63.8%

<sup>4</sup> Based on expanded survey results where passengers identified their race or ethnicity

Table 6: Income Data for Discontinued Routes Passenger Survey<sup>5</sup>

Route	Low-Income	Total	Low-Income Percent
Route 7	191	329	58.2%
Route 29	69	116	59.6%
Route 36	360	612	58.9%
Route 47	326	456	71.5%
Route 49	90	120	74.7%
Route 54	88	116	76.5%
Route 66	6	90	6.5%
Route 67	21	68	31.6%
Route 68		22	0.0%
Route 70	12	50	25.0%
Route 75	43	65	66.7%
Route 79	3	28	11.8%
Discontinued Routes	1,212	2,071	58.5%
System	54,264	78,424	69.2%

## Routes with Frequency Reductions

The plan recommends major service reductions for six routes. Of these routes, only Route 25 triggers a disparate impact or disproportionate burden based on demographic data from the census.

Table 7: Demographics for Routes with Frequency Reductions – Census Data

Route	Population	Poverty	% in Poverty	Minority	% Minority
Route 25	156,154	34,037	21.8%	52,472	33.6%
Route 34	96,335	13,527	14.0%	22,738	23.6%
Route 50	86,859	14,573	16.8%	16,520	19.0%
Route 55	124,432	17,623	14.2%	19,540	15.7%
Route 72	143,011	18,894	13.2%	24,806	17.3%
Route 74	95,419	16,645	17.4%	24,728	25.9%
Reductions in Frequency	702,210	115,299	16.4%	160,804	22.9%

None of the routes with frequency reductions triggered a disparate impact when they were evaluated using passenger survey data. However, the reductions to Route 55's service hours did

<sup>5</sup> Based on expanded survey results where passengers identified their household income (Annual household incomes below \$25k were considered low-income)

have a disproportionate burden. About 85 percent of the route’s passengers were identified as low-income.

Similar to the discontinued routes, the routes scheduled for service reductions served minority and low-income passengers at lower rates than the overall system.

Table 8: Race and Ethnicity Data for Routes with Frequency Reductions – Passenger Survey

Route	Minority	Total	Minority Percent
Route 25	1,150	2,896	39.7%
Route 34	996	1,515	65.7%
Route 50	243	457	53.2%
Route 55	467	1,086	43.0%
Route 72	-	40	0.0%
Route 74	19	123	15.4%
Reductions in Frequency	2,875	6,117	47.0%
System	55,900	87,579	63.8%

Table 9: Income Data for Route with Frequency Reductions – Passenger Survey

Route	Low-Income	Total	Low-Income Percent
Route 25	1,502	2,516	59.7%
Route 34	814	1,390	58.5%
Route 50	342	443	77.2%
Route 55	868	1,026	84.6%
Route 72		45	0.0%
Route 74	9	95	10.0%
Reductions in Frequency	3,535	5,515	64.1%
System	54,264	78,424	69.2%

## Routes with Alignment Changes

In addition to scaling back service hours to better match market conditions, NFTA adjusted route alignments to improve transit efficiency and effectiveness. Five of the six routes with major reductions in frequency also experienced changes to their alignments: Routes 25, 34, 50, 72, and 74. Route 25 was the only route to trigger a disparate impact or disproportionate burden based on the census data. None of the routes had exceeded the thresholds for disparate impacts or disproportionate burdens when evaluated using the passenger survey.

## Major Investments

The major service changes allowed NFTA to reinvest resources towards more productive services. NFTA has made recommendations to increase hours and/or miles by 25 percent on 8 routes. The benefits include more frequency and trips. The following table summarizes how these improvements impact Title VI populations.

Table 10: Impacts of Major Improvements

Route	Routes with Major Improvements			
	Census Data		Passenger Survey	
	Low-Income	Minority	Low-Income	Minority
Route 11	14.9%	25.8%	47.9%	38.6%
Route 16	24.3%	31.3%	78.2%	40.4%
Route 19	28.2%	54.2%	74.4%	76.5%
Route 22	35.5%	65.8%	80.9%	72.9%
Route 23	27.2%	51.4%	78.6%	67.2%
Route 42	13.5%	14.5%	88.5%	72.7%
Route 48	8.3%	20.5%	68.3%	63.0%
Route 61	31.4%	43.5%	26.5%	8.3%
System	14.7%	23.6%	69.2%	63.8%
Threshold	17.6%	28.3%	83.0%	76.6%

The values highlighted in green indicate that the major improvements benefited routes that had significantly higher rates of minority or low-income residents and/or passengers (20 percent greater than the system average). Based on census data, a number of improvements will benefit areas with higher concentrations of Title VI populations.

## Summary of Major Service Changes

NFTA plans to make a number of major service changes to the existing network by discontinuing routes, reducing service hours, and adjusting alignments. These changes allow NFTA to improve system efficiency and effectiveness and also allow the agency to reinvest resources towards more productive services. The subsequent table presents the demographic information for each route undergoing a major service change. The first set of demographic information is based on census data. Routes that result in disparate impacts or disproportionate burdens are highlighted in red. A number of major service changes triggered disparate impacts or disproportionate burdens based on census data. NFTA also turned to passenger survey data to get additional demographic information more closely tied to transit use. With this data set, fewer major service changes trigger disparate impacts or disproportionate burdens. The routes that crossed the thresholds for a disparate impact and or disproportionate burden warrant additional review to determine possible service alternatives or mitigation measures.

Table 11: Summary of Major Service Changes

Summary of Major Service Changes							
Route	Census Data		Passenger Survey		Type of Major Service Change		
	Low-Income	Minority	Low-Income	Minority	Discontinued	Service Reduction	Alignment
Route 7	32.9%	56.6%	58.2%	57.8%	x		
Route 25	21.8%	33.6%	59.7%	39.7%		x	x
Route 29	32.8%	72.0%	59.6%	91.9%	x		
Route 34	14.0%	23.6%	58.5%	65.7%		x	x
Route 36	17.4%	24.1%	58.9%	49.7%	x		
Route 47	11.1%	23.0%	71.5%	62.9%	x		
Route 49	9.2%	22.8%	74.7%	58.9%	x		
Route 50	16.8%	19.0%	77.2%	53.2%		x	x
Route 54	26.2%	32.0%	76.5%	67.9%	x		
Route 55	14.2%	15.7%	84.6%	43.0%		x	
Route 66	18.7%	45.7%	6.5%	19.6%	x		
Route 67	26.3%	60.8%	31.6%	61.7%	x		
Route 68	25.1%	57.0%	0.0%	20.0%	x		
Route 70	14.8%	18.3%	25.0%	10.0%	x		
Route 72	13.2%	17.3%	0.0%	0.0%		x	x
Route 74	17.4%	25.9%	10.0%	15.4%		x	x
Route 75	17.0%	22.2%	66.7%	55.6%	x		
Route 79	23.6%	34.6%	11.8%	11.8%	x		
System	14.7%	23.6%	69.2%	63.8%			
Threshold	17.6%	28.3%	83.0%	76.6%			

## Alternatives and Mitigation to Impacted Riders

NFTA Metro has proposed a number of changes to optimize its services and reinforce the core network. Some of the proposed changes included targeted reductions in service based on performance, cost inefficiencies, or duplication. The following routes had service changes that would result in disparate impacts and disproportionate burdens based on census and/or passenger survey data:

- Route 7
- Route 25
- Route 29
- Route 54
- Route 55
- Route 66
- Route 67
- Route 68
- Route 79

These routes serve concentrations of minority or low-income passengers that exceeded the threshold set forth by the NFTA Service Equity Policy, requiring additional review. NFTA has identified mitigating factors that minimize the impacts that these service reductions will have on minority and low-income populations. Table 12 summarizes the mitigation measures for each major service reduction resulting in a disparate impact or disproportionate burden.

Table 12: Alternatives and Mitigation to Impacted Riders

Route	Mitigating Factor
Route 7	All impacted ridership is within 1/4 mile of frequent service on Routes 3 and 20.
Route 25	Route 25 overlaps with Route 11 south of Hertel Ave. The two routes will provide this segment with combined service every 15 minutes towards downtown; 62 percent of current ridership boards along this segment. The segments of this route with above average concentrations of minority populations will receive 15-minute service.
Route 29	The majority of impacted riders have access to alternate service via Routes 18, 23, 24 and 26. Only 9 percent of current riders, or 13 boardings per weekday, board at stops that are not within 1/4 mile of other service.
Route 54	Relatively few boardings will be impacted, only 26 boardings per weekday occur at stops that are further than 1/4 mile of proposed service.
Route 55	Unchanged alignment means that all current riders will still have access to service. Reduced frequency is due to low productivity of the route (12.6 boardings per hour). This allows saved resources to be reinvested into service more beneficial to more riders.
Route 66	All impacted riders will be able access to Route 48L.
Route 67	Route 32 will provide a connection to rail service via Amherst Station (all but 2 daily average boardings on Route 67 are within 1/4 -mile of Route 32 service).
Route 68	Route 204 will connect the Airport and downtown Buffalo. Route 24 will also provide service from the Airport area to downtown. Only 10 boardings per day occur at stops more than 1/4 mile from alternate service.
Route 79	Route 61 provides express service to downtown Buffalo, and Route 25 provides local service to downtown Buffalo. Only 3 boardings occur at stops outside of 1/4 mile of alternate service and all stops are within 1/2-mile of those served by Route 79.

The impacts of major service reductions on minority and low income populations will be mitigated by the fact that the majority of riders will still have access to service. For routes that have been discontinued (Routes 7, 29, 54, 66, 67, 68, and 79), the majority of their ridership will have access to other bus routes, with some routes such as Route 7 being completely within a ¼ mile of more frequent service. Route 25's reduction in frequency will effectively only impact less than half of its ridership since scheduling will provide 62 percent of its ridership with 15-minute service to downtown. Route 55 will have a reduction in frequency to match the area's demand for transit, optimizing agency resources.

## Public Outreach Activities

Upon adoption of the *Erie and Niagara County Service Plan*, NFTA plans to conduct extensive outreach to inform passengers and the general community of the proposed service changes. Many of the outreach efforts will be designed to reach Title VI populations, particularly in areas where service may be affected. Current policy regarding service changes requires that a public hearing be held if any service change affects 25 percent or more of a route. Given the discussion above, a number of services will fall under this threshold and therefore public hearings will be held. NFTA is currently developing an overall communications plan for public outreach, and recommendations are being folded into a long-range transportation plan.

## Conclusion

NFTA has developed the *Erie and Niagara County Service Plan* to maximize resources, improve core service, and create a more sustainable network. The agency developed recommendations based on productivity and financial effectiveness, resulting in proposed changes to 55 routes. According to NFTA's Title VI policies, 18 routes would experience a "major service change." NFTA analyzed these changes and concluded nine of them would result in a disparate impact and/or disproportionate burden.

The agency identified alternatives for passengers on these impacted routes. NFTA listed the alternatives for each service change resulting in a disparate impact or disproportionate burden. NFTA found that the majority of impacted riders would still have access to transit service. Many of the eliminated routes duplicated other services. NFTA also highlighted the eliminated segments that were not close to another route. These segments were unproductive and generated minimal ridership. Some of the savings from these changes will be reinvested in the core network, where transit can serve a higher number of passengers.

SURFACE:

5. D. (1) Authorization of New NFTA Fare Structure

RECOMMENDATION: Staff recommends that the Board approve the Draft Fare Structure presented to the public in September and October of 2016 and confirmed for compliance with Title VI. Based on our findings through the public hearing process and focus groups, the attached fare structure can be advanced with additional development of a transition plan.

INFORMATION: NFTA Metro is in the process of upgrading the fare collection system. In August of 2016, the Board authorized staff to conduct public hearings and approved the Title VI analysis. Two (2) public hearings were conducted, in Buffalo and Niagara Falls, respectively. Additionally, focus groups were conducted by a consultant on September 14<sup>th</sup>, 2016.

These public outreach efforts provided insights relating to the proposed fare structure and the fare collection project as a whole. Customers expressed excitement relating to the use of credit/debit cards, an online account, automatic reloading and mobile ticketing. The most frequent and ubiquitous concern related to the end of day pass sales on the vehicle. Individuals stated that this change may create difficulties for many riders and were concerned about the impact on customer convenience. As such, the NFTA has developed a phasing and transition plan for a minimum of six (6) months to ease these concerns and allow for staff to be responsive to customer needs. This will allow staff to collect data on the needs of this specific fare use group and respond adequately. Additionally, it will allow for targeted educational outreach to inform customers of their fare payment options.

Staff recommends that the Board approve the new fare structure, including the further development of a phasing plan to lessen the impact of the removal of day pass sales on vehicles.

FUNDING: No funding is required.

“**RESOLVED**, that the Board hereby adopts the proposed fare structure attached hereto.”

# Fare Equity Title VI Analysis

July 2016  
Draft



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## Overview

NFTA is looking to replace and upgrade its entire fare collection system with advanced technology to make paying for transit faster, easier, and more flexible. The agency will be replacing fareboxes and ticket vending machines with "Smart Cards" and Mobile ticketing. NFTA will also install new fare gates at eight underground rail stations. A majority of the pricing structure will remain the same, but fees for new or replacement smart cards will be introduced. As a result of these changes, NFTA is conducting a fare equity analysis. FTA requires a fare equity analysis for all fare changes regardless of the amount of increase or decrease. NFTA will evaluate the effects of its fare changes to ensure that the changes do not result in a disparate impact on the basis of race, ethnicity, or national origin or a disproportionate burden on low income households.

## NFTA Fare Equity Policy

The fare equity analysis will use the following policies and thresholds to assess the impacts of the new fare structure.

### Disparate Impact Policy

NFTA recommends twenty percent (20%) as the threshold above which an impact is deemed "a statistically significant disparity." This means that if the percentage difference between the minority population affected by the service or fare change is above twenty percent (20%) than the minority population of the overall service area, a disparate impact exists.

Should a proposed major service or fare change result in a disparate impact, NFTA will consider modifying the proposed change to avoid, minimize, or mitigate the disparate impact of the change. If NFTA finds potential disparate impacts and then modifies the proposed changes to avoid, minimize, or mitigate potential disparate impacts, NFTA will reanalyze the proposed changes to determine whether the modifications actually removed the potential disparate impacts of the changes.

### Disproportionate Burden Policy

NFTA recommends twenty percent (20%) as the threshold above which an impact is deemed "a statistically significant disparity." This means that is the percent difference between low-income population affected by the service or fare change is above twenty percent (20%) than the low-income population of the overall service area, a disproportionate burden exists.

Should a proposed major service or fare change result in a disproportionate burden, NFTA will consider modifying the proposed change to avoid, minimize, or mitigate the disproportionate burden of the change. If NFTA finds a potential disproportionate burden and then modifies the proposed changes to avoid, minimize, or mitigate potential disproportionate burdens, NFTA will reanalyze the proposed changes to determine whether the modifications actually removed the potential disproportionate burden of the changes.

## Existing Conditions

### Payment and Fare Media

The following fare media are currently available for use on the NFTA Metro system:

- **Cash** is accepted on-board buses and at ticket vending machines (TVMs).
- **Tokens** are no longer sold, but are still accepted on-board buses and at TVMs.
- **Paper-based fare cards** for multi-uses passes.

### Fares and Passes

Table 1 illustrated the different fare types NFTA currently offers.

*Table 1: Existing Fare Structure*

Existing Fare Structure		
Fare Type	Price	Description
Standard fare	\$2	Single ride on Metro Buses and Metro Rail.
Day Pass	\$5	Valid on the service day of purchase (5 am to 2 am) for Metro Buses and Metro Rail.
Seven Day Pass	\$25	Pass good for seven calendar days on Metro Bus and Metro Rail.
30 Day Pass	\$75	Valid for 30 calendar days on Metro Bus and Metro Rail.
Monthly Pass	\$75	Valid for unlimited use in a calendar month on Metro Bus and Metro Rail.
PAL Pass	\$35, \$70	Pass allows for 10 or 20 trips on Paratransit Access Line, a curb to curb paratransit service.
Summer Go Pass	\$60	Allows individuals 17 years and under to ride during the summer
Round Trip Rail	\$4	Two-way ticket allows for rail travel to and from a location
Enhanced Express	\$0.50	Passengers pay a 50 cent surcharge to access enhanced express service. This service features fewer stops, Wi-Fi, and free access to Metro Park & Rides. The surcharge is applicable to cash and pre-paid fares.

## Reduced fares

Reduced fares are available for standard fares, day, seven-day, 30-day, and monthly passes. Youth ages 5 to 11 years old, seniors aged 65 years and older, and people with disabilities or Medicare qualify for the reduced fares pay half the cost of the full fare.

## NFTA Metro PAL

Customers using NFTA Metro PAL paratransit services pay no more than twice the standard fare for trips that meet the ADA complementary paratransit service requirements: service must be provided within 0.75 miles of a local bus route or rapid transit station and at the same hours and days as the fixed-route service. However, NFTA charges a premium fare for trips: where the origin or destination is not within the ADA-mandated service area, that begin or end outside of the ADA-mandated service hours, or same-day and “will-call” trips (which are outside the scope of the ADA).

## Points of Purchase

NFTA currently allows passengers to purchase their fares and passes in different ways:

- **On-board** – Passengers can purchase a standard fare or day pass when boarding a bus.
- **Ticket vending machines** – TVMs dispense standard fares, one-day, seven-day, 30-day, monthly, and PAL passes.
- **Retail** – Monthly and Summer Go Passes are available at Tops, Dash’s Market, and Parkside Pharmacy.
- **Online** –Monthly, PAL, and Summer Go Passes can be purchased online. The transactions are handled through PayPal.

Table 2 summarizes the existing fare structure and points of purchase.

*Table 2: Point of Purchase for Existing Fare Media*

Fare Type	Points of Purchase			
	On-Board	Ticket Vending machines	Retail	Online
Standard	x	x		
Day Pass	x	x		
Seven Day Pass		x		
30 Day Pass		x		
Monthly Pass		x	x	x
PAL Pass		x		x
Summer Go Pass			x	x
Round Trip Rail		x		
Enhanced Express	x			

# Proposed Fare Structure

NFTA is looking to upgrade its fare collection system to make paying for transit faster, easier to use, and to allow the customer to have more flexibility in how they use the system. The upgrade is expected to be completed in the fall of 2017 and the emphasis of the new system will be on 'stored value' cards, also known as Smart Cards. Stored value cards reduce dwell times, give passengers more control over their passes, allow for potential recovery of lost passes, and make bulk sales easier to facilitate.

## Payment and Fare Media

The base fare cost and multi-use passes will remain fairly the same under the new system. In addition, passengers will have access to new types of fare media. The following payment and fare media is proposed:

- **Cash** will be accepted on-board buses and at TVMs.
- **Credit cards and debit cards** will be accepted at TVMs. This gives passengers more flexibility in how they pay for their transit rides.
- **Tokens** will no longer be valid for use anywhere on the system.
- **Paper-based fares** will be replaced by smart cards.
- **Smart Cards** can be programmed with a unique account number. The accounts can hold stored value, calendar passes, or both. Stored value and passes can be recovered for registered accounts. They can also be linked to other transportation services including car share, bike share, or parking facilities. Additional features of smart cards include best value technology (see Capped Fare and Best Value section). New and replacement smart cards will cost \$2. They can be purchased at all NFTA Metro Rail stations, transit centers, and retail outlets.
- **The NFTA Mobile App** will be available for download on smart phones. The app can be used to access a registered account and it works the same way as a smart card, but with a barcode for boarding a bus or entering a turnstile. When a user has both a smart card and mobile app, only one can be active at a time.
- A **Limited Use Smart Card** is a plastic or paper card with computer chip. It will be pre-programmed with specific fare product on it. It is designed to be disposable and cannot have additional value added to it. It also cannot be recovered if lost or stolen.

Table 3 summarizes the differences in the proposed fare media structure.

*Table 3: Proposed Changes to Fare Media*

Fare Media Comparison		
Fare Media Comparison	Existing	Proposed
Cash	x	x
Tokens	x	
Paper-based fares	x	
Credit/Debit Card (TVMs)		x
Smart cards (account-based)		x
Mobile app		x
Limited use smart card		x

## Fares and Passes

NFTA is introducing a fare and pass structure that is similar to its current structure with some minor changes:

- The monthly pass will change from 30-days to 31-days while keeping the price constant, giving passengers an extra calendar day for free.
- A pass based on the calendar week will be introduced, giving passengers another option for multi-use travel.
- A new monthly pass for Enhanced Express service will be available for purchase. This pass eliminates the surcharge that passengers would normally have to pay to ride the premium services.
- A new Rail Only 31-Day Pass will also be introduced, giving rail passengers another option for payment.
- Children under the age of 10 years old will be allowed to ride free when accompanied by an adult (limit 3 children per adult). NFTA currently charges a reduced fare for children between the ages of five and 11.

Table 4 summarizes NFTA's proposed fare structure.

*Table 4: Proposed Fare Structure*

Proposed Fare Structure			
Fare Type	Existing Price	Proposed Price	Description
Standard fare	\$2	\$2	Single ride on Metro Buses and Metro Rail.
Day Pass	\$5	\$5	Valid on the service day of purchase (4am to 2 am) for Metro Buses and Metro Rail.
Seven-Day Pass	\$25	\$25	Pass good for seven calendar days on Metro Bus and Metro Rail
Weekly Pass	-	\$25	Pass good from Monday to Sunday of a calendar week on Metro Bus and Rail
31-Day Pass	\$75 (30 Day)	\$75	Valid for 31 calendar days on Metro Bus and Metro Rail
Monthly Pass	\$75	\$75	Valid for unlimited use in a calendar month on Metro Bus and Metro Rail
PAL Pass	\$35,\$ 70	\$35, \$70	Pass allows for 10 or 20 trips on Paratransit Access Line, a curb to curb paratransit service
Summer Go Pass	\$60	\$60	Allows individuals 17 years and under to ride during the summer months
Round Trip Rail	\$4	\$4	Two-way ticket allows for rail travel to and from a location
Enhanced Express	\$0.50	\$0.50	Passengers pay a 50 cent surcharge to access enhanced express service. This service features fewer stops, Wi-Fi, and free access to Metro Park & Rides. Sucharge must be paid in cash or with stored value from account.
Enhanced Express 31-Day Pass	-	\$90	Valid for 31 calendar days on Enhanced Express service, Metro Bus, and Metro Rail.
Rail Only 31-Day Pass	-	\$50	Valid for 31 calendar days on Metro Rail.

## Reduced Fares

Reduced fares will still be available for seniors ages 65 and older, people with disabilities, or Medicare. NFTA currently offers a reduced fare for children between the ages of 5 and 11., but under the proposed policy, children under the age of 10 years old will be allowed to ride for free

when accompanied by an adult (limit 3 children per adult). Individuals who qualify for the reduced fares will continue to pay half the cost of the full fare.

NFTA will offer reduced standard fares as well as reduced day, seven-day, 31-day, and monthly passes. NFTA will also introduce reduced fares for its weekly pass, Enhanced Express 31-Day Pass, and Rail Only 31-Day Pass. All of these multi-use passes will be available on smart cards or mobile ticketing.

Table 5: Reduced Fare Structure

Proposed Reduced Fare Structure			
Fare Type	Existing Price	Proposed Price	Description
Standard fare	\$1	\$1	Single ride on Metro Buses and Metro Rail.
Day Pass	\$2.50	\$2.50	Valid on the service day of purchase (4am to 2 am) for Metro Buses and Metro Rail.
Seven-Day Pass	\$12.50	\$12.50	Pass good for seven calendar days on Metro Bus and Metro Rail
Weekly Pass	-	\$12.50	Pass good from Monday to Sunday of a calendar week on Metro Bus and Rail
31-Day Pass	\$37.50(30 Day)	\$37.50	Valid for 31 calendar days on Metro Bus and Metro Rail
Monthly Pass	\$37.50	\$37.50	Valid for unlimited use in a calendar month on Metro Bus and Metro Rail
Enhanced Express	\$0.25	\$0.25	Passengers pay a surcharge to access enhanced express service. This service features fewer stops, Wi-Fi, and free access to Metro Park & Rides. Surcharge must be paid in cash or with stored value from account.
Enhanced Express 31-Day Pass	-	\$45	Valid for 31 calendar days on Enhanced Express service, Metro Bus, and Metro Rail.
Rail Only 31-Day Pass	-	\$25	Valid for 31 calendar days on Metro Rail.

## NFTA Metro PAL

The structure for NFTA Metro PAL will remain largely the same. However, passengers can now pay for their PAL trip fare with stored value on a smart card or mobile account. Eligibility for PAL service will still be based on how a person’s disability under ADA prevents the use of accessible fixed-route

service. Customers using NFTA Metro PAL paratransit services will pay no more than twice the standard fare for trips that meet the ADA complementary paratransit service requirements.

## Best Value or Capped Fares

The introduction of smart cards or mobile ticketing brings additional benefits in terms of capped fares and best value. Passengers with smart cards or mobile ticketing can use their stored value to pay for single rides. However, if they ride enough times in a business day, the new fare technology will cap their fares and automatically upgrade the passenger to a \$5-day pass. This eliminates the uncertainty passengers often face when comparing the costs and benefits of a day pass and multiple one-way rides.

Additionally, if a passenger has calendar passes and stored value on their smart card, the technology will always utilize the more expensive pass first. Stored value will not be touched until the available calendar passes expire.

## Points of Purchase

The proposed fare structure gives NFTA passengers additional ways to purchase their fares and passes:

- **On-board** – Passengers can purchase a standard fare when boarding a bus. Day passes will no longer be sold on board the bus.
- **Ticket vending machines** – Passengers can use TVMs to buy multi-use passes and reload their smart cards.
- **Retail** – NFTA Metro uses a number of merchants as third-party pass sale outlets. Outlets sell stored value that can be used for single rides or day passes. Premium Outlets sell monthly/31 day passes and stored value. The purchase of pass products for seniors and disabled will be limited to riders with a NFTA-issued photo ID senior/disabled smart card.
- **Online** – NFTA Metro fare media and stored value will be available for purchase online at a secured website.
- **Mobile App** - Mobile ticketing will allow customers to access and use stored value, full fare, and reduced fare products from a registered account on their smartphone.

The table below summarizes where the proposed fare media can be purchased. Map 1 illustrates proposed retail and TVM locations.

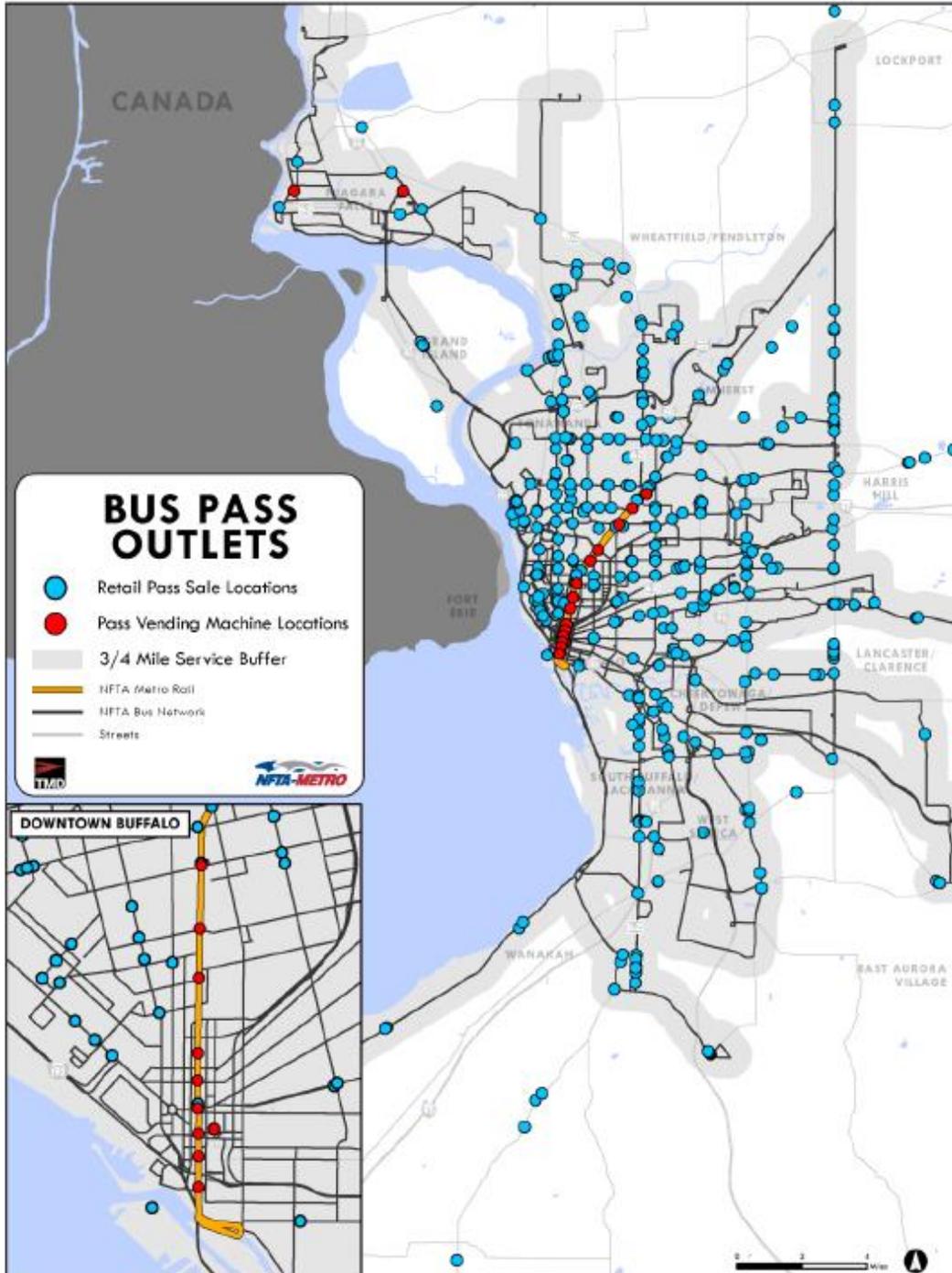
*Table 6: Proposed Fare Structure and Points of Purchase*

Fare Type	Points of Purchase				
	On-Board	Ticket Vending Machines	Retail	Online	Mobile App
Standard Fare	x	Stored Value	Stored Value	Stored Value	Stored Value
Day Pass		Stored Value	Stored Value	Stored Value	Stored Value
Seven Day Pass		x		x	x
Weekly Pass		x		x	x
31 Day Pass <sup>1</sup>		x	x	x	x
Monthly Pass <sup>2</sup>		x	x	x	x
PAL Pass		x		x	
Summer Go Pass				x	
Round Trip Rail		x			
Enhanced Express	x	Stored Value	Stored Value	Stored Value	Stored Value
Enhanced Express 31-Day Pass		x	x	x	x
Rail Only 31-Day Pass		x		x	x

<sup>1</sup> Fare product must be loaded onto smart card or mobile device

<sup>2</sup> Fare product must be loaded onto smart card or mobile device

Map 1: Proposed Bus Pass Outlet Sale Locations



## Summary of Changes

The new proposed fare structure brings many benefits to NFTA and its passengers. However, the introduction of the new technology will result in some changes to the existing structure. The following section summarizes the changes passengers will experience when the new fare structure is implemented:

- **Smart card technology will be introduced.** Smart cards will act as a digital wallet, storing cash value as well as multi-use fare products. Smart cards provide passengers with more flexibility, control, and convenience. New and replacement cards will cost \$2.
- **A mobile app will be introduced.** Like the smart card, passengers can use the mobile app to access, purchase, and store value as well as their fare passes. The mobile app will be free to download.
- **NFTA is transitioning away from on-board sales of day passes in order to improve boarding times.** Passengers who want to access the benefits of a day pass will need to utilize a smart card or mobile ticketing. Passengers can load stored value on their smart cards at a TVM, retail outlet, online, or via a mobile application. Passengers who use stored value will automatically be upgraded to a day pass with 3 or more one-way rides in a day.
- **Tokens will no longer be accepted in the system.** Passengers who currently use tokens will have to transition to another form of payment: cash, credit, smart card, or mobile ticketing.
- Passengers can use **TVMs to reload their smart cards.** Credit and debit cards can be used at TVMs.
- **NFTA is selling new fare products to give passengers more options for their travel needs.** The 30-day pass changed to 31-day pass at no additional cost. The new weekly pass will be based on calendar week. The Enhanced Express 31-day pass eliminates the surcharge that passengers would normally have to pay to ride the premium services. The Rail Only 31-Day Pass gives rail passengers another alternative to the general monthly pass.
- **Children ages 10 and under ride free** with an adult (limit 3 children per adult).

## Fare Equity Analysis

The following section evaluates whether these changes have a disparate impact and/or disproportionate burden on minority and low-income riders, respectively.

## Data Sources

To ensure compliance with Title VI regulations, the fare equity analysis used demographic data from the United States Census Bureau as well as data from the 2012 on-board passenger survey. US

Census Bureau was used to identify the census tracts where a higher rate of minority and low-income individuals reside in order to analyze the potential impacts of a fare change.

The on-board passenger survey data was used to develop a detailed understanding of passenger demographics and their preferred method of fare payment. The survey was distributed on all NFTA routes and was weighted and expanded to reflect 2012 daily ridership levels<sup>3</sup>.

## Methodology

For the purpose of this fare equity analysis, minority passengers were considered respondents who answered the race/ethnicity question and marked a category other than just “Caucasian/White”.

Low-income riders were considered survey respondents who filled out the income question and listed their household income as less than \$24,999 per year. The US Department of Health & Human Services (HHS) published updated poverty guidelines in January 2016. The guidelines identify households in poverty based on household size and annual income. The table below summarizes these guidelines.

*Table 7: HHS Poverty Guidelines*

HHS Poverty Guidelines for 2016	
Household Size	Income
1	\$11,880
2	\$16,020
3	\$20,160
4	\$24,300
5	\$28,440
6	\$32,580
7	\$36,730
8	\$40,890

This fare equity analysis used household incomes of \$24,999 per year as its threshold for due to the discrete choices in the survey for household income and household size. It was not possible to determine a respondent’s exact household size and income. The analysis assumed average household sizes of between 3 and 4 individuals and included the survey choices that best captured this poverty threshold: less than \$5,000, \$5,000 - \$9,999, \$10,000 - \$14,999, and \$15,000 - \$24,999.

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<sup>3</sup> Sample weighting adjusts for non-response at the bus trip level and accounts for sampling trips at the route level. Sample expansion expands the weighted sample to reflect the population ridership at the system-wide level.

Using this dataset, the method of fare payment and the demographic characteristics of each rider could be identified. The first key analysis is understanding the method of fare payment across different groups.

## Existing Methods of Payment

Table 8 summarizes the current fare usage by rider group and fare type using 2012 survey data.

*Table 8: Current Fare Usage*

Current Fare Usage by Group <sup>4</sup>						
Fare Type	Minority <sup>5</sup>	Low Income <sup>6</sup>	Total Riders <sup>7</sup>	Minority	Low Income	Total
Cash	10,856	10,820	20,638	20%	20%	21%
Day Pass	15,359	14,407	25,106	28%	27%	25%
Weekly Pass	727	873	1,356	1%	2%	1%
Monthly Pass	16,478	17,429	31,708	30%	32%	32%
Round Trip Rail	286	305	796	1%	1%	1%
Student Pass	7,285	5,657	10,921	13%	10%	11%
University Pass	2,030	2,068	3,680	4%	4%	4%
Token	1,937	1,966	3,346	3%	4%	3%
Free Ride	503	454	1,366	1%	1%	1%
<b>Total</b>	<b>55,461</b>	<b>53,980</b>	<b>98,919</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>

Overall, the majority of NFTA boardings were transacted using a monthly pass, day pass, and cash. These fare types make up nearly 80 percent of the total ridership. The round-trip rail pass, tokens, university pass, and weekly pass account for less than 10 percent of ridership. When broken down by passenger group:

- Minority riders use cash and monthly passes at slightly lower rates than the total.
- Minority riders use day passes and student passes at slightly higher rates than the total.
- Low-income riders use cash and student passes at slightly lower rates than the total.
- Low-income riders use day passes, tokens, and weekly passes at slightly higher rates than the total.

<sup>4</sup> Based on weighted and expanded 2012 NFTA On-Board Survey

<sup>5</sup> Passengers who identified a fare type and selected an ethnicity other than just "Caucasian/White"

<sup>6</sup> Passengers who identified a fare type and stated a household income less than \$24,999

<sup>7</sup> Passengers who identified a fare type

## Impacts of New Fare Structure

The following section evaluates how the new fare structure will affect passengers based on the current fares they use. Table 9 provides a summary of these findings. Overall, the changes are not expected to create a disparate impact or disproportionate burden on passengers.

The transition away from on-board day pass sales means that some passengers will have to change how they pay for their trips. NFTA will provide a number of other alternatives for these passengers including mobile ticketing, smart cards, and retail outlets. The new fare media will give passengers more flexibility in how they pay for and manage their transit trips. The outlets will be strategically placed across the service area to minimize coverage gaps and to make the transition as seamless as possible. The transition away from on-board day pass sales is not a disparate impact nor a disproportionate burden because minority and low-income riders use day passes at a similar to the total population of riders.

*Table 9: Summary of Title VI Impacts*

Summary of Title VI Impacts			
Current Fare	Change	Identified Disparate Impact?	Identified Disproportionate Burden?
Cash	Can still use cash	No	No
Day Pass	No on-board sales, no paper pass, smart card best value/capped fare	No	No
Weekly Pass	More purchase options	No	No
Monthly Pass	More purchase options	No	No
Round Trip Rail	More purchase options	No	No
Student Pass	Smart card capability	No	No
University Pass	Smart card capability	No	No
Token	No longer accepted	No	No

### Impacts to Current Cash Passengers

Passengers will still be able to pay for single rides on Metro Bus, Rail, and PAL services with cash. Their fares are not changing. As a result, no impact is assumed to passengers who still want to use cash to pay for their single ride.

There are no projected disparate impacts nor disproportionate burdens based on the current distribution of cash riders among minority, low-income, and overall users (20 percent, 20 percent, and 21 percent).

## Impacts to Current Day Pass Passengers

NFTA will no longer sell day passes on-board buses in order to optimize dwell times. However, the 2012 survey data found that a majority of passengers who used a day pass purchased their pass on-board the bus (see Table 10).

*Table 10: Day Pass Purchase Location by User Group*

Day Pass Purchases			
Purchase Location	User Group		
	Minority	Low-Income	Overall
On the Bus	84%	85%	85%
Ticket Vending Machine	13%	11%	11%
Social Services	1%	1%	1%
Store Outlet	1%	1%	1%
University Pass	1%	0%	1%
Employer/Metro Advantage	0%	0%	0%
NFTA Cash Office	0%	0%	0%
High School/Middle School	0%	0%	0%
Online Purchase	0%	0%	0%

To minimize the impact of this transition on passengers, NFTA has developed a number of alternatives for day passes:

- Smart card:** Passengers have the option of loading stored value onto their smart cards. Each day, passengers who pay with the stored value from their smart cards will automatically be upgraded to a day pass after three or more one-way rides. This benefits the passenger by eliminating the decision between multiple one-way trips and a day pass. Passengers automatically get the most cost-efficient fare given their usage.

Stored value can be added to a smart card account at a NFTA Metro vending machine, online, on mobile, or at any point of sale location. Once again, these multiple access points are designed to reach as many passengers as possible. The subsequent map, Map 2, shows that the placement of third-party point of sale outlets will serve a significant portion of NFTA's service area. Most of the census tracts in the service area will be within a ½ mile of a bus pass outlet. Of the census tracts that are outside a ½ mile of an outlet, only three tracts are identified as a "minority tract", a tract where the concentration of minority residents is above the average for the service area. However, all three minority tracts are located outside of NFTA's service area, so a bus pass outlet in these area is not strategic. A detailed list of the census tracts is included in the Appendix.

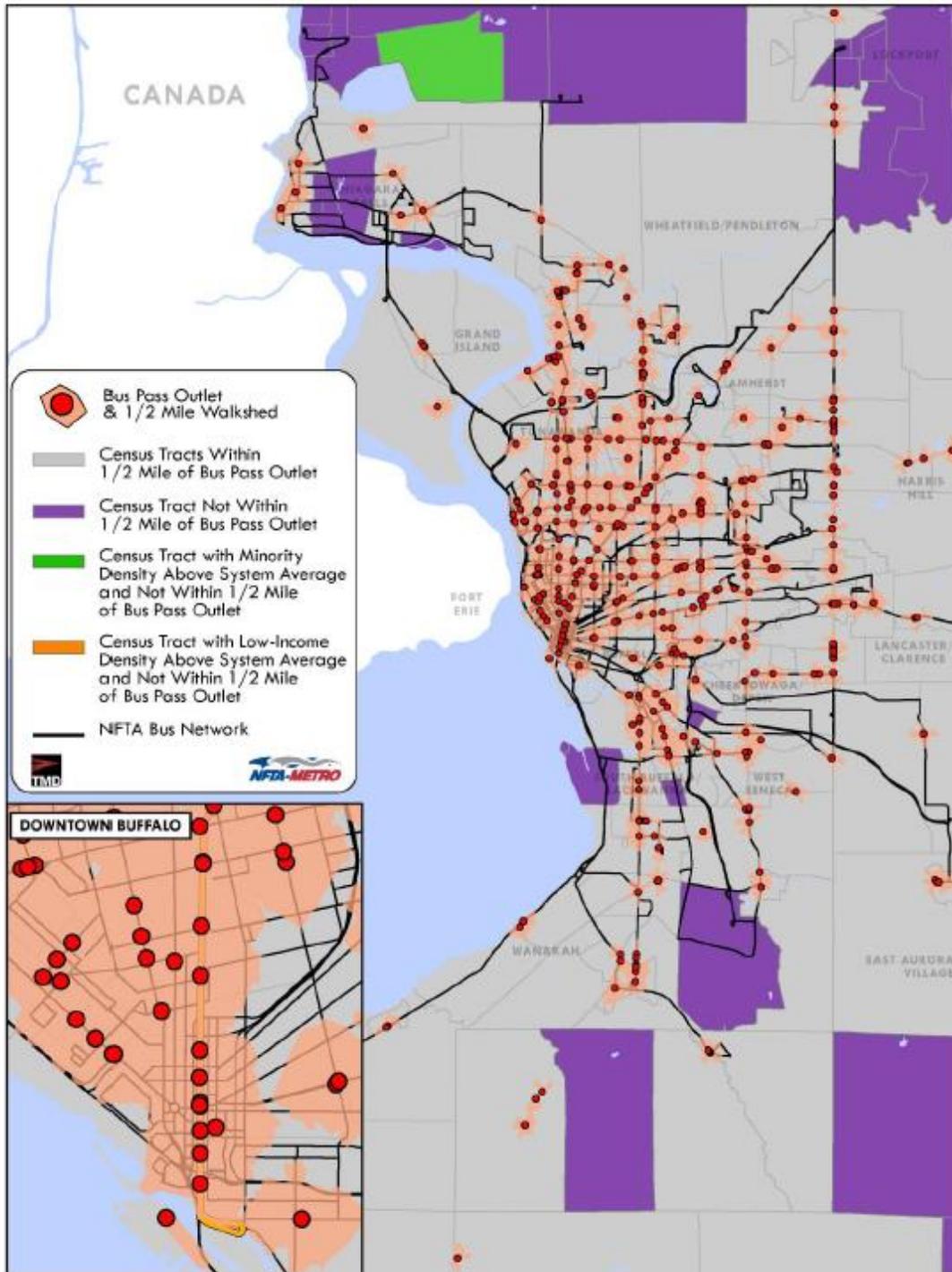
Passengers may incur a one-time fee for new or replacement smart cards. The cost of the fare media is \$2. Smart cards can be purchased at all NFTA Metro Rail Stations, transit centers, third party retail outlets, and NFTA Metro pass sales outlets. To encourage the use of smart cards during the initial roll-out of the system, NFTA Metro may provide smart cards

free of charge to riders who purchase a smart card-based fare. Social service agencies may be provided free smart cards for first time users on an ongoing basis.

- **Mobile ticketing:** Like smart cards, one day passes will automatically be provided as “best value” to users with mobile accounts who ride 3 or more times in one day. The NFTA Mobile App can be downloaded on any eligible smartphone. It is not necessary to have an NFTA smart card in order to create a mobile account. A 2013 study from the Pew Research study estimates that 91 percent of Americans own a cell phone, and that 63 percent of cell phone owners use their phone to go online. Those with lower incomes are far more likely to use their phone as a primary internet device.

The elimination of on-board day pass sales will likely be one of the biggest transitions for current customers. Of the 25 percent of passengers who ride NFTA services with a day pass, a significant majority, 85 percent, actually buy their pass on the bus. This change does not result in a disparate impact or disproportionate burden, because the ratio of passengers who use day passes is fairly consistent across minority, low-income, and total riders (28 percent, 27 percent, and 25 percent). The difference is not significant enough to trigger the threshold established by NFTA Title VI policies. However, the agency has made efforts to make this transition away from on-board day passes much more seamless by automatically upgrading passengers who use stored value into day passes when they pay for 3 or more one-way fares in one day. Passengers can load stored value onto smart cards at retail outlets and TVMs or by using the internet and mobile devices.

Map 2: Pass Sale Outlet Locations within a 1/2 Mile of Census Tracts



## Impacts to Current Seven-Day Pass Passengers

Seven-day passes are currently only available for purchase at TVMs. Under the new fare structure, NFTA will still sell these passes at TVMs. The agency will also offer this product on smart cards and the mobile application. The price for the seven-day pass will remain the same. As a result, there are no projected disparate impacts or disproportionate burdens on minority and low-income riders currently using the seven-day pass.

## Impacts to Current 30-Day Pass Passengers

Nearly one-third of current NFTA boardings use a 30-day pass. This pass is the most common fare media among all riders including minority and low-income passengers. According to the passenger survey, the majority of respondents obtain their monthly passes from retail outlets, social service groups, TVMs, and their employers. NFTA will preserve these points of access with the new fare structure.

*Table 11: Top 4 Monthly Pass Purchase Locations*

Monthly Pass Purchases (Top 4)			
Purchase Location	Minority	Low-Income	Grand Total
Store Outlet	41%	39%	44%
Social Services	15%	21%	15%
Ticket Vending Machine	13%	13%	13%
Employer/Metro Advantage	9%	8%	11%

The agency is updating the pass to cover 31-days instead of 30. Additionally, NFTA is increasing the number of retail partners where fares can be purchased. The agency will continue to work with social service agencies and employers to provide them with monthly pass options. However, one key difference with the new fare structure is that the monthly pass will be loaded onto a smart card or mobile device. Passengers can use a mobile device to load the pass or purchase a smart card for \$2 at rail stations, TVMs, transit centers, or participating retail outlets. Even with the transition to new fare media, no disparate impact or disproportionate burden is projected. The cost of the monthly pass will remain the same and the points of purchase will increase. NFTA will look to minimize the financial impact of the initial \$2 smart card fee by offering free smart cards to social service agencies and employers.

## Impacts to Current Round Trip Rail Passengers

About 1 percent of current passengers purchase a two-way rail fare for their transit trips. This percentage is consistent within minority and low-income passengers. Passengers currently buy round trip tickets for \$4 at TVMs. This will not change with the new fare structure. No disparate impact or disproportionate burden is projected.

## Impacts to Current Passengers with Student-Based Passes

About 15 percent of NFTA passengers use a student or university pass. This ratio also holds with minority and low-income passengers, 17 and 14 percent, respectively. School-based passes will

continue to be based on individual partnerships even with the new fare structure. Educational institutions can contract with NFTA and pay a lump-sum amount for unlimited rides for its students. If an organization already has a smart card, NFTA will allow their organization’s card to be used to board NFTA vehicles. NFTA will provide smart cards or smart stickers to the contracted organizations without the technology.

NFTA currently offers reduced fares to youth between the ages of 5 and 11. The new fare policy will change how youth fares are handled. Children ages 10 and under will ride for free when accompanied by an adult. Children who currently ride with an adult will benefit from this policy change. However, there is no data on how many current passengers under the age of 11 ride alone. The analysis assumes that most children under 10 either ride with a school pass for school-based trips or with an adult for other trip making. The survey data does show that most youth under the age of 16 used a school pass. More than 60 percent of youth under the age of 16 ride NFTA services using a school pass. Youth eligible for a school pass should receive the new fare media from their schools. A higher rate of low-income youth use day passes. Low-income youth under the age of 10 will ride for free with an adult. The other low-income youth can obtain a day pass via stored value on a smart card or mobile ticketing. They can manage stored value at a retail outlet, TVM, online, or through their mobile device.

*Table 12: Top 4 Fare Media Usage for Children Under 16 Years Old*

Fare Usage for Children Under 16 Years Old (Top 4)						
Fare Type	Minority	Low Income	Total	Minority	Low Income	Total
Monthly Pass	35	13	35	8%	5%	6%
Day Pass	28	63	85	6%	25%	15%
Cash	78	54	92	17%	22%	16%
Student Pass	301	120	343	66%	48%	61%

## Impacts to Current Passengers who use Tokens

NFTA is proposing to eliminate tokens when it moves towards a digital, more account-based fare system. The benefits of this move have been detailed in previous sections. Tokens will no longer be valid for use anywhere on the system. About 3 percent of total passengers currently use tokens to ride NFTA service. This also holds for minority and low-income passengers at 3 and 4 percent, respectively. Passengers who use tokens will have a number of different alternatives available to them. They will be able to pay for their single trips with cash on-board or with credit cards or debit cards at TVMs. They can also convert to smart cards or mobile ticketing. This is neither a disparate impact nor a disproportionate burden, because the rates of token use are the same across minority ridership, low-income ridership, and overall ridership.

## Impacts from New Fares

NFTA is introducing three new fares when it upgrades its system. It will be introducing a weekly, calendar-based pass, an Enhanced Express 31-Day Pass, and a Rail Only 31-Day Pass. These fares

Table 14: Reduced Fare Usage

Reduced Fare Usage by Group <sup>a</sup>						
Fare Type	Minority <sup>a</sup>	Low Income <sup>10</sup>	Total <sup>11</sup>	Minority	Low Income	Total
Cash	653	987	1,575	13%	15%	16%
Day Pass	1,651	2,044	2,960	33%	31%	30%
Weekly Pass	35	92	129	1%	1%	1%
Monthly Pass	2,295	3,155	4,707	47%	47%	47%
Round Trip Rail	16	42	67	0%	1%	1%
Student Pass	9	42	79	0%	1%	1%
University Pass	258	217	348	5%	3%	3%
Token	-	34	34	0%	1%	0%
Free Ride	11	70	84	0%	1%	1%
<b>Total</b>	<b>4,929</b>	<b>6,683</b>	<b>9,984</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>

## Impacts to PAL

The structure for passengers who use PAL will remain largely the same. Eligibility and requirements will still be the same. They now will be able to pay for their PAL fare with stored value on a smart card or mobile account.

<sup>a</sup> Based on weighted and expanded 2012 NFTA On-Board Survey

<sup>9</sup> Passengers who used "Senior/Disabled" fare, identified a fare type, and selected an ethnicity other than just "Caucasian/White"

<sup>10</sup> Passengers who used "Senior/Disabled" fare, identified a fare type, and stated a household income less than \$24,999

<sup>11</sup> Passengers who used "Senior/Disabled" fare and identified a fare type

## Conclusion

NFTA's new fare collection system will make paying for transit faster, easier to use, more flexible. In preparation for the Fall 2017 change, NFTA has conducted a fare equity analysis in order to ensure that the proposed changes do not result in a disparate impact on the basis of race, ethnicity, or national origin or a disproportionate burden on low income households.

The fare equity analysis detailed the existing fare structure, the proposed fare structure, and the differences between the two. NFTA is looking to introduce two key fare media into the system: smart cards and mobile ticketing. This new technology provides many benefits to both passengers and the transit agency. Additionally, NFTA is moving away from more inefficient methods of payment, primarily on-board day pass sales and tokens.

Based on this analysis minority and low-income passengers used NFTA's fare media at rates similar to the total population of riders. The differences in usage rates were not large enough not to trigger the threshold set by the NFTA board (20 percentage point difference for minority or low-income riders compared to the system average).

However, in order to ensure that the transition is seamless, NFTA will automatically give passengers the best value and upgrade them to a day pass after three or more trips in one day when using stored value. Passengers can manage stored value using a number of alternatives: TVMs, retail outlets, the internet, and mobile ticketing. The distribution of these retail outlets was analyzed to ensure that minority and low-income residents had equal access to these locations. Three census tracts with an above average rate of minority residents were more than a ½ mile away from a retail outlet. However, each of these tracts were located outside of NFTA's service area.

As a result, this fare equity analysis concludes that the transition to the new fare technology will not result in a disparate impact to minority riders or a disproportionate burden to low-income passengers.

# Appendix

## Census Tract NOT within 1/2 Mile of Pass Outlet

Census Tracts	Total Population	Minority Population	Population in Poverty	Percentage Minority	Percentage in Poverty
36063023404	5,047	508	333	10%	7%
36063021300	2,121	837	765	39%	36%
36063023402	4,059	290	277	7%	7%
36063024202	2,967	59	342	2%	12%
36063024404	4,786	105	174	2%	4%
36063024001	6,132	448	631	7%	10%
36063024002	1,698	26	165	2%	10%
36063990000	-	-	-	0%	0%
36063020300	2,217	595	398	27%	18%
36063020700	2,717	933	488	34%	18%
36063021000	2,754	831	871	30%	32%
36063021400	1,884	479	396	25%	21%
36063024201	6,628	150	619	2%	9%
36063024405	5,323	186	153	3%	3%
36063024102	2,806	308	326	11%	12%
36063023700	2,092	773	774	37%	37%
36063024401	2,698	55	246	2%	9%
36063023800	3,352	543	687	16%	20%
36063940001	997	933	226	94%	23%
36063024501	2,908	138	149	5%	5%
36063024502	3,824	282	291	7%	8%
36063023901	4,156	393	782	9%	19%
36063023902	4,966	507	260	10%	5%
36063024101	3,881	118	459	3%	12%
36063024301	1,203	4	184	0%	15%
36063940100	-	-	-	0%	0%
36063024303	5,830	599	174	10%	3%
36063024302	4,758	110	377	2%	8%
36063021700	3,282	821	849	25%	26%
36063022200	3,982	422	368	11%	9%
36029015102	2,771	37	171	1%	6%
36029015101	3,267	86	166	3%	5%
36029015302	2,807	21	146	1%	5%
36029016100	2,592	1,569	3	61%	0%
36029940100	17	-	-	0%	0%
36029940000	1,845	1,745	412	95%	22%
36029013501	7,034	529	116	8%	2%

Census Tracts	Total Population	Minority Population	Population in Poverty	Percentage Minority	Percentage in Poverty
36029014801	2,571	158	299	6%	12%
36029015001	5,318	178	189	3%	4%
36029017501	1,473	223	307	15%	21%
36029015504	3,984	158	325	4%	8%
36029017400	3,788	2,093	1,770	55%	47%
36029990000	-	-	-	0%	0%
36029017502	2,493	42	241	2%	10%
36029011500	1,526	142	99	9%	6%
36029012502	2,064	337	401	16%	19%

## Census Tracts within 1/2 mile of Pass Outlet

Census Tracts	Total Population	Minority Population	Population in Poverty	Percentage Minority	Percentage in Poverty
36063023405	3,910	514	664	13%	17%
36063023500	2,618	735	781	28%	30%
36063023401	7,361	827	684	11%	9%
36063023600	3,858	687	809	18%	21%
36063022702	6,440	211	73	3%	1%
36063024406	3,411	315	64	9%	2%
36063020400	1,574	913	421	58%	27%
36063020500	2,497	787	904	32%	36%
36063020600	1,286	865	527	67%	41%
36063020900	2,610	1,576	1,225	60%	47%
36063021100	1,249	606	339	49%	27%
36063022711	10,081	540	486	5%	5%
36063020100	3,580	234	766	7%	21%
36063020200	2,655	2,374	1,480	89%	56%
36063022803	3,606	208	114	6%	3%
36063023100	2,429	115	360	5%	15%
36063023200	2,778	96	604	3%	22%
36063023300	7,027	633	1,341	9%	19%
36063022804	3,474	139	175	4%	5%
36063023001	2,099	194	264	9%	13%
36063022712	8,059	620	687	8%	9%
36063021200	2,163	938	615	43%	28%
36063022000	3,285	223	749	7%	23%
36063022100	2,824	375	654	13%	23%
36063022300	2,714	176	83	6%	3%
36063022500	2,643	158	306	6%	12%
36063022401	1,883	149	132	8%	7%
36063022602	5,711	597	636	10%	11%
36063022601	2,614	388	351	15%	13%
36063024600	4,766	130	303	3%	6%
36063022902	3,131	93	259	3%	8%
36063022901	2,063	19	306	1%	15%
36029010902	4,454	701	620	16%	14%
36029009008	4,782	823	119	17%	2%
36029009501	4,959	688	221	14%	4%
36029009502	7,066	1,045	274	15%	4%
36029012501	4,859	449	624	9%	13%
36029007903	3,524	159	182	5%	5%
36029014400	4,209	171	552	4%	13%
36029003700	3,940	3,584	1,875	91%	48%

Census Tracts	Total Population	Minority Population	Population in Poverty	Percentage Minority	Percentage in Poverty
36029010101	4,656	803	194	17%	4%
36029006301	4,926	1,562	1,428	32%	29%
36029014901	2,607	104	394	4%	15%
36029005000	2,340	1,139	685	49%	29%
36029015402	5,398	345	391	6%	7%
36029006602	2,205	608	402	28%	18%
36029009112	3,124	598	595	19%	19%
36029004500	5,760	2,609	577	45%	10%
36029004800	4,384	1,002	189	23%	4%
36029004900	5,780	1,569	911	27%	16%
36029005100	4,581	1,255	723	27%	16%
36029005201	2,776	665	530	24%	19%
36029005300	1,554	727	225	47%	14%
36029005400	4,035	956	398	24%	10%
36029005500	3,811	1,927	1,906	51%	50%
36029005600	4,176	2,655	1,466	64%	35%
36029001500	1,485	1,361	386	92%	26%
36029004200	3,356	3,206	1,284	96%	38%
36029007600	3,115	60	299	2%	10%
36029013002	5,699	470	585	8%	10%
36029014300	6,116	533	304	9%	5%
36029000600	4,995	685	617	14%	12%
36029008800	3,510	393	458	11%	13%
36029010400	2,306	675	529	29%	23%
36029009302	2,865	680	348	24%	12%
36029015800	4,204	121	351	3%	8%
36029015401	2,628	131	182	5%	7%
36029014803	6,024	304	249	5%	4%
36029005202	2,679	1,733	613	65%	23%
36029011100	2,238	132	191	6%	9%
36029000500	1,968	405	546	21%	28%
36029000700	3,637	133	24	4%	1%
36029000900	2,321	206	300	9%	13%
36029001000	5,144	739	1,146	14%	22%
36029001100	2,774	266	745	10%	27%
36029001600	2,031	1,771	1,008	87%	50%
36029001700	1,901	787	426	41%	22%
36029005802	4,424	2,034	1,521	46%	34%
36029009010	5,195	1,045	339	20%	7%
36029006902	4,179	2,497	1,801	60%	43%
36029009107	5,493	1,648	1,020	30%	19%
36029009004	3,701	743	55	20%	1%
36029015003	3,394	46	394	1%	12%

Census Tracts	Total Population	Minority Population	Population in Poverty	Percentage Minority	Percentage in Poverty
36029015301	4,879	101	187	2%	4%
36029015600	2,074	312	187	15%	9%
36029015700	3,516	90	283	3%	8%
36029015900	4,298	365	524	8%	12%
36029013202	5,199	219	209	4%	4%
36029006601	3,019	1,650	1,046	55%	35%
36029006701	3,252	1,141	448	35%	14%
36029006100	4,912	3,386	2,117	69%	43%
36029006201	1,918	-	-	0%	0%
36029006302	2,806	254	263	9%	9%
36029006501	2,945	1,053	590	36%	20%
36029013400	6,475	196	248	3%	4%
36029013502	7,225	117	147	2%	2%
36029013600	3,294	154	125	5%	4%
36029013701	5,986	219	212	4%	4%
36029013702	5,666	309	155	5%	3%
36029013800	7,681	254	384	3%	5%
36029013900	2,407	60	138	2%	6%
36029014000	3,694	202	139	5%	4%
36029014101	6,131	105	218	2%	4%
36029014102	5,282	85	210	2%	4%
36029014204	4,036	194	244	5%	6%
36029014501	3,445	49	176	1%	5%
36029014502	2,481	46	745	2%	30%
36029014601	4,899	703	146	14%	3%
36029014702	8,493	864	429	10%	5%
36029014903	6,554	593	490	9%	7%
36029014904	1,634	-	-	0%	0%
36029015002	3,009	134	381	4%	13%
36029009113	7,054	797	194	11%	3%
36029009114	3,928	828	213	21%	5%
36029010808	3,852	861	353	22%	9%
36029010809	3,229	116	48	4%	1%
36029000800	4,850	457	648	9%	13%
36029001402	3,450	3,388	1,485	98%	43%
36029014603	4,216	641	126	15%	3%
36029014604	7,735	778	133	10%	2%
36029014208	5,048	311	103	6%	2%
36029014207	5,284	613	219	12%	4%
36029014206	7,232	346	205	5%	3%
36029015202	4,832	165	210	3%	4%
36029015501	1,867	176	221	9%	12%
36029008500	2,540	352	92	14%	4%

Census Tracts	Total Population	Minority Population	Population in Poverty	Percentage Minority	Percentage in Poverty
36029011400	2,335	388	604	17%	26%
36029007101	3,654	3,045	1,837	83%	50%
36029009104	4,202	627	162	15%	4%
36029006702	3,212	1,155	610	36%	19%
36029009106	3,120	789	77	25%	2%
36029009109	3,126	696	406	22%	13%
36029014209	4,076	181	184	4%	5%
36029016300	2,903	944	910	33%	31%
36029009115	3,517	1,046	1,443	30%	41%
36029009009	4,850	832	209	17%	4%
36029009116	5,480	1,153	874	21%	16%
36029016200	2,221	536	127	24%	6%
36029007304	5,356	439	136	8%	3%
36029007700	4,624	122	480	3%	10%
36029007800	5,328	197	663	4%	12%
36029007901	3,298	597	190	18%	6%
36029007303	7,204	916	503	13%	7%
36029006800	3,942	1,238	1,105	31%	28%
36029007000	2,943	2,177	1,452	74%	49%
36029007102	2,862	2,300	1,673	80%	58%
36029007902	5,960	532	255	9%	4%
36029008600	4,437	640	169	14%	4%
36029008700	4,875	574	381	12%	8%
36029009402	4,406	396	136	9%	3%
36029013101	6,495	419	354	6%	5%
36029008900	4,384	305	334	7%	8%
36029007202	1,854	962	200	52%	11%
36029007302	7,909	599	598	8%	8%
36029007904	3,376	366	236	11%	7%
36029007905	4,302	271	713	6%	17%
36029008001	5,625	966	593	17%	11%
36029008002	5,717	886	663	15%	12%
36029008003	5,664	689	759	12%	13%
36029008101	5,639	473	328	8%	6%
36029008102	4,173	248	196	6%	5%
36029008201	2,403	134	174	6%	7%
36029008202	3,775	315	441	8%	12%
36029008300	2,539	653	815	26%	32%
36029008400	2,191	168	256	8%	12%
36029009006	7,313	1,015	291	14%	4%
36029009007	7,843	1,446	271	19%	4%
36029017100	4,850	3,493	2,862	72%	59%
36029017200	2,007	387	424	19%	21%

Census Tracts	Total Population	Minority Population	Population in Poverty	Percentage Minority	Percentage in Poverty
36029013102	8,091	515	355	6%	4%
36029014701	5,378	310	292	6%	5%
36029015201	3,182	12	82	0%	3%
36029000200	3,992	832	916	21%	23%
36029001900	3,029	318	294	10%	10%
36029002300	3,248	779	1,155	24%	36%
36029002400	4,418	1,586	1,298	36%	29%
36029002502	2,072	1,957	590	94%	28%
36029004001	3,867	3,518	1,538	91%	40%
36029004100	4,498	4,295	1,121	95%	25%
36029004300	5,354	4,693	1,921	88%	36%
36029004401	3,881	3,591	1,074	93%	28%
36029004402	2,686	2,686	1,593	100%	59%
36029005801	3,301	581	909	18%	28%
36029000110	2,624	733	730	28%	28%
36029015503	2,476	320	213	13%	9%
36029006901	3,560	2,956	1,767	83%	50%
36029009200	4,110	1,002	584	24%	14%
36029009301	4,864	1,987	919	41%	19%
36029009401	5,946	991	546	17%	9%
36029009600	6,066	899	354	15%	6%
36029009701	3,269	180	234	6%	7%
36029009702	4,435	392	249	9%	6%
36029009800	1,653	99	229	6%	14%
36029009900	3,631	228	695	6%	19%
36029010001	3,016	145	188	5%	6%
36029016500	1,489	695	424	47%	28%
36029016600	2,841	2,837	1,156	100%	41%
36029016800	4,151	4,121	1,382	99%	33%
36029017300	6,866	488	363	7%	5%
36029004601	3,469	1,785	902	51%	26%
36029004602	1,380	816	3	59%	0%
36029003800	3,239	2,852	1,359	88%	42%
36029004700	6,316	5,290	1,835	84%	29%
36029010003	3,900	436	541	11%	14%
36029010002	3,879	123	208	3%	5%
36029010102	3,632	1,225	811	34%	22%
36029010103	3,999	355	429	9%	11%
36029010300	1,341	867	398	65%	30%
36029010500	2,316	855	248	37%	11%
36029010600	2,379	210	212	9%	9%
36029010700	2,725	309	312	11%	11%
36029010803	2,053	12	113	1%	6%