



# MEMORANDUM

TO:	Arlanda Rouse, Civil Rights Officer
FROM:	Pamela White, Service Development Manager
	Charlotte Area Transit System -CATS
SUBJECT:	Title VI Review of Major Service Changes
DATE:	August 13, 2018

#### Service Background

Today, CATS has limited crosstown service and offers "Spoke-like" transit services coverage. This forces passengers to travel to uptown Charlotte to complete travel patterns to areas that parallel their origin or destination. This increases travel time and subjects the passengers to inconvenient and inefficient bus routes service. In 2016, CATS launched Envision My Ride (EMR), a planning initiative to redesign the current bus system. Through this initiative, CATS analyzed bus route structure and frequency to determine how to improve the system and better serve the Charlotte region.

#### Public Outreach

CATS has held over 100 public meeting to the discuss route changes with approximately 3,800 attendees. The initial public meetings allowed passengers to express their travel needs and level of satisfaction with the current services utilized by the customers. The feedback was received on location of the public meetings. In addition, CATS conducted an initial EMR Customer Satisfaction Survey. CATS received 1,209 completed surveys. Utilizing the feedback and the information from the completed surveys, CATS developed a proposed plan for route and service adjustments.

Key Considerations for Envision My Ride:

- Cross-town and suburb-to-suburb bus service
- Connections between different bus routes and between bus and light rail
- Frequency of service
- More direct services

The Key Considerations were derived from the feedback received in the public outreach efforts. Upon the completion of the EMR bus route proposals, CATS developed an online Map Survey that allowed passengers to digitally view route proposals and submit feedback using a feedback survey tool. CATS made the online Map Survey available on the CATS Website for nearly sixty days and 325 online Map Surveys were received. CATS also took each of the mentioned bus route proposals to each of the public meetings. Attendees were provided with the opportunity to individually view the changes, assess the impact they would experience with the proposed changed. Attendees provided CATS with written or emailed feedback. The attendees were also able to takes copies of the proposed changes for further evaluation. The culmination of the surveys and feedback sessions provided CATS with the proposals used implementation of Phase II of the Envision My Ride (EMR). These proposals were minor and

A Major Service Change is any change to an existing bus route that affects more than 25 percent of the daily revenue miles, elimination of an existing transit route without replacement, and new service routes. As part of EMR, CATS has selected to modify several buses. Many of these routes will experience changes which are considered minor. However, Routes 2 Ashley Rd, 8 Tuckaseegee, 25 Clanton Rd, 30 Woodlawn, Scaleybark Crosstown, 34 Freedom Dr., 45X Carmel Rd Express, and 56 Arrowood will experience more significant changes. Routes 2, 8, 34, and 56 operate weekdays, Saturdays, and Sundays. Route 25 and 30 operates weekdays and Saturdays. Route 45X operates on weekdays only.

EMR Phase II concentrates on bus routes that serve northwest and southwest Charlotte. The bus routes provide connections from Uptown Charlotte to communities in the northwest and southwest areas of Charlotte. The proposed adjustments would provide passengers with increased crosstown service, more direct service, and more convenient transit service. Each of the bus routes service multiple Census Tracts. Six of the bus routes serve Census Tracts that exceed the CATS established Thresholds of 49% Minority and/or 15.9% Poverty. Thus, Routes 2, 8, 25, 30, 34, and 56 operates in Low Income Census Tracts. Routes 8, 30, and 34 operate in Minority Census Tracts. The Route 45X Carmel Rd Express operates in Census Tracts that report 33% Minority and 13.40% Low Income. The reported minority and poverty levels do not exceed the CATS established Minority or Poverty Thresholds. Thus, Route 45X does not meet the guidelines required to complete a Title VI Equable Service Analysis.

Route	Service Area	Census Tracts
2 Ashley Rd	Westley Heights, Amazon, Cargo/Aiport Road	98.01, 39.03, 59.06, 40, 41, 4, 5, 1
	Seversville, Wildwood, Tuckaseegee Rd.,	
8 Tuckaseegee Rd	Charlotte Industial Area	43.04, 43.02, 42, 45, 41, 5, 1, 43.05
	Carolina Medical Center, West Blvd Library,	
	Amay James Center, Arbor Glen Outreach,	
25 Clanton Rd	Novant Health Center,	39.03, 39.04, 37, 36, 35, 34, 3, 26,
		54.01, 44, 43.02, 43.05, 42, 40, 41, 36,
	South Park Mall, Beatties Ford Rd, Revolution	39.02, 37, 33, 32.04, 31.03, 29.06, 27.02,
30 Woodlawn	Park, Freedom Dr	32.03
	Freedom Dr, Tuckaseegee Rd, Seversville,	
34 Freedom Dr	Marmac and Toddville Communities,	1, 5, 41, 42, 40, 43.05, 43.03, 60.06, 59.06
	Rivergate, Whitehall Commons, and Southgate	58.24, 38.08, 59.16, 59.12, 59.13, 59.14,
56 Arrowood	Shopping Center, CPCC	98.02, 59.17, 59.18, 59.11, 59.10
	Carmel Commons Shopping Center,	
	Presbyterian Hospital, Strawberry Hill, Central	41, 5, 47, 1, 58.30, 58.31, 30.08, 30.07,
45X Carmel Express	Church of God Park and Ride	29.04, 20.04, 22, 21, 23, 28, 26, 25, 3, 6, 4

As part of the analysis to determine the proximity to transit service, CATS utilizes <sup>3</sup>/<sub>4</sub> quarter mile walking distance to the nearest bus stop as an acceptable tolerance level for passengers to access transit. This is consistent with the <sup>3</sup>/<sub>4</sub> quarter mile distance service availability that is used by the American with Disability Act of 1990.

CATS is proposing full discontinuation of the Routes 25X and 45X. These proposals are under consideration because of low performance. Route 45X carries 7.68 passengers per hour and 25 carries 7.06 passengers per hour. This compares to 17.14 passengers per hour for express bus routes and 22.13 passengers per hours for local bus routes. As part of the service change proposals, the more productive areas of the Routes 25 and 45X would maintain service via service adjustments to other bus routes. The listed services that maintained for each of the routes can be reviewed within the Disparate and Disproportionate Analysis.

Major Service Change proposals are recommended for 2, 8, 30, 34, and 56. The adjustments result in Routes 8, 30, and 56 reflecting a loss in overall service hours. It should be noted that proposed service areas on the 8, 30, and 56 would be served by other bus adjustments to routes 2 and 34 as well as other bus routes not requiring analysis.

Route	Current	EMR	Difference
Weekday Service Hours			
2 Ashley Park	32 hrs 52 mins	33 hrs 38 mins	2.50%
8 Tuckaseegee	59 hrs 2 mins	44 hrs 13 mins	-34%
25 Clanton Rd	25 hrs 50 min	0 hrs 0 mins	-100%
30 Woodlawn	39 hrs 48 mins	30hrs 39 mins	-30%
34 Freedom Dr	41 hrs 48 mins	50 hrs 50 mins	22%
45X Carmel Rd	8 hrs 13 min	0 hrs 0 mins	-100%
56 Arrowood	61 hrs 24 mins	41 hrs 53 mins	-47%

Overall, the Saturday and Sunday Service Hours adjustments reflect levels which actually increase service hours. In most cases, the weekend service area is smaller than the weekday service. The weekend service areas often serve the most productive areas of a bus route. This maintains most of the current structure while proving minor service expansions.

The proposed discontinuation of the Route 25 results in a total loss of the service hours on Saturdays. Routes 25 and 45X provides no service on Sundays. The Route 56 reports service hours reduction of 36 service hours. However, an expansion of Route 16 would replace the service area discontinued by the Route 56.

Route	Current	EMR	Difference	
Saturday Service Hours				
2 Ashley Park	26 hrs 58 mins	29 hrs 23 mins	9%	
8 Tuckaseegee	32 hrs 42 mins	32 hrs 58 mins	0.02%	
25 Clanton Rd	12 hrs 52 min	0 hrs 0 mins	-100.00%	
30 Woodlawn	36 hrs 9 mins	37hrs 31 mins	0.50%	
34 Freedom Dr	34 hrs 31 mins	40 hrs 14 mins	17%	
45X Carmel Rd	No Service	No Service	No Service	
56 Arrowood	42 hrs 7 mins	30 hrs 56 mins	-36%	

Route	Current	EMR	Difference
Sunday Service Hours			
2 Ashley Park	15 hrs 46 mins	16 hrs 9 mins	2.50%
8 Tuckaseegee	17 hrs 40 mins	23 hrs 59 mins	36%
25 Clanton Rd	No Service	No Service	No Service
30 Woodlawn	No Service	No Service	No Service
34 Freedom Dr	23 hrs 41 mins	28 hrs 33 mins	21%
45X Carmel Rd	No Service	No Service	No Service
56 Arrowood	28 hrs 31 mins	30 hrs 20 mins	6.50%

# **Disparate and Disproportionate Analysis**

According to the US Census Report, the each of the five analyzed bus routes operate in Census Tracts that report a low income rates exceeding the established 15.9% and three of the five bus routes operate in minority Census Tracts which exceed 49%. See map attachments.

Route	Percentage		Threshold	
	Minority	Poverty	Minority	Poverty
2 Ashley Park	47.16%	19.17%	49%	15.9%
8 Tuckaseegee	67.49%	20.87%	49%	15.9%
25 Clanton Rd	46.78%	23.00%	49%	15.9%
30 Woodlawn	59.19%	21.74%	49%	15.9%
34 Freedom Dr	58.24%	16.25%	49%	15.9%
45X Carmel Express	33.00%	13.40%	49%	15.9%
56 Arrowood	48.89%	16.25%	49%	15.9%

The effects of the proposed changes does reflect a Disparate Burden and Disproportionate Impact as the proposed changed do impact low-income and minority populations within the service areas. However, the Analysis completed identifies that many of the proposed changes are replaced with other bus route adjustments, duplicate existing service, and minimal walks to access bus stops within the .75 mile walking tolerance level observed by CATS.

# Analysis of Impacts

**Route 2 Ashley Park**– The route becomes a crosstown service to increase efficiency and the ability for residents to travel across town without the need to travel into uptown to transfer. Thus, the proposed includes terminating the bus route at the Scaleybark LYNX Light Rail Station in lieu of the Charlotte Transportation Center (CTC). Passengers will experience improve transit network with expanded service to Park Road and Park Road Shopping Center, and SouthPark Mall. Passengers experiencing discontinued service in neighborhood will experience up to .32 mile. In addition, the new Route 18 Paw Creek/Rosa Park will provide service within the discontinued community. Passengers previously utilizing service between uptown and Ashley Rd will maintain service via the Sprinter which operates along the same streets or within 1-2 blocks of the discontinued area.

**Findings and Mitigation** – Passengers who experience discontinued service may use the existing bus route service that operates parallel to the Route 2. Mitigating service would be available to by using modified bus routes. If the modifications of the route are not adopted, passengers will not experience an expansion of transit service access. In addition, there will not be an approximate 12 percentage increase in the number residents' access to transit service.

**Route 8 Tuckaseegee** – Service along Parkway Ave, Brice St, Carol Ave, State St, and Sumter Ave is proposed to be discontinued. Riders desiring service would have an approximate .43 mile walk to the closest bus stop along Tuckaseegee Rd. Service along other proposed discontinued areas would be replaced by the proposed 2 and 34. Service west of Ashley Rd currently provided by Route 34, as well as service to West Meck High School and Phillip O. Berry would be provided with the proposed 8. Service along Edgewood Rd would be maintained by the new route 34. Service on Thriftwood Dr., Interurban Ave, Tillman Rd, and Bradford Dr. would be replaced by the new Route 2. Service on Welling Ave, Tillman Rd east of Rowan St is proposed to be discontinued. Riders would need to walk to Tillman Rd for service on the proposed Route 2.

**Findings and Mitigation** – Passengers who experience discontinued service may access transit service by walking less than <sup>3</sup>/<sub>4</sub> mile to a bus stop. Mitigating service would be available to by using modified bus routes. If the modifications of the route are not adopted, passengers will not experience an expansion of transit service access. In addition, there will not be an approximate 16 percentage increase in number residents' access to transit service.

Route 25 Clanton Rd - Service on the Route 25 is proposed to be discontinued for the October service change. The discontinued areas: East Blvd between Park Rd and Scott Ave, Kenilworth between East Blvd and Romany Rd, Kenilworth between East Morehead St and Charlottetowne Ave, as well as on Tyvola Rd south of West Blvd and the Perimeter Pointe Parkway. Although these areas are proposed to be discontinued, Routes 2, 6, 10, 16, 19, 30, and 235 would to maintain transit access in proposed discontinued areas. Routing on Clanton between West Blvd and S Tryon will be replaced by 30. Routing on South Tryon between Clanton Rd and Remount Rd will be replaced by Routes 2 and 16. Routing on South Tryon between Remount Rd and West Blvd would be replaced by Route 16. Routing on West Blvd between South Tryon and South Blvd would be replaced by route 10. Routing on East Blvd between South Blvd and Park Rd would be replaced by Route 19. Routing between East and Scott and Kenilworth and Morehead would be replaced by Route 6. Routing on Charlottetowne Ave at the Metropolitan Ave would be serviced by Route 6. Passengers may walk to East Blvd at Park Rd for service on the 19 or to East Blvd at Scott Ave for service on the 6. Passengers walk over to Scott Ave. for service on the 6. Service to the Amay James Ave will be replaced by 235. Routing on West Blvd between Amay James and Clanton Rd would be replaced by 10. The Route 20 would replace a portion of the service along East Blvd. The discontinued areas that would not have a service replacement could result in an approximate .31 mile walk.

**Findings and Mitigation** – Passengers who experience discontinued service may access transit service by walking less than <sup>3</sup>/<sub>4</sub> mile to a bus stop. Mitigating service would be available to by using any six of the proposed modified bus routes. If the modifications of the route are not adopted, passengers will not experience an expansion of transit service access. In addition, there will not be an approximate 3 percentage increase in number residents' access to transit service.

**Route 30 Woodlawn/Scaleybark** – Service along Route Bradford Dr. would experience a discontinued service. These passengers may experience approximately .32 mile walk to the closest bus stop. No other area will experience discontinued service without a replacement. Service is proposed to be extended to Westerly Hills via Clanton Rd, Remount Rd, and Ashley Rd. Service north of Alleghany and Ashley would be replaced by the proposed Routes 2 and 8. Current 30 routing on S Tryon between Clanton and Remount Rd would be replaced by Routes 2 and 16. Service on Remount Rd would be replaced by Routes 2.

**Findings and Mitigation** – Passengers who experience discontinued service may access transit service by walking less than <sup>3</sup>/<sub>4</sub> mile to a bus stop. Mitigating service would be available to by using modified bus routes. If the modifications of the route are not adopted, passengers will not experience an expansion of transit service access. In addition, there

will not be an approximate 3.2 percentage increase in number residents' access to transit service.

**Route 34 Freedom Drive** – Service along Freedom Dr. between Alleghany Rd and Ashley Rd is proposed to be discontinued. Passengers desiring transit access would have an approximate .27 mile walk to Ashley Rd for service on the proposed Routes 2 or 8, or approximately .46 mile to Alleghany Rd for service on the proposed Route 34. Service is proposed to be extended to Paw Creek via Freedom Dr. and Toddville Rd. Service west of Tuckaseegee Rd and Edgewood Dr would be replaced by the proposed Route 8. Service to Phillip O. Berry and West Mecklenburg High Schools would be replaced by the proposed Route 8.

**Findings and Mitigation** – Passengers who experience discontinued service may access transit service by walking less than <sup>3</sup>/<sub>4</sub> mile to a bus stop. Mitigating service would be available to by using modified bus routes. If the modifications of the route are not adopted, passengers will not experience an expansion of transit service access. In addition, there will not be an approximate 19 percentage increase in number residents' access to transit service.

**Route 56 Arrowood** – Service is proposed to be extended to Carolina Premium Outlets via Brown Grier Rd, Steele Creek Rd, and Dixie River Rd. Service along South Tryon from Arrowood Rd to Rivergate Shopping Center is proposed to be replaced by the Route 16. Service along Whitehall Commons Center Dr. would to be relocated to a bus stop along to W. Arrowood Rd.

**Findings and Mitigation** – Passengers who experience discontinued service may access transit service by walking less than <sup>3</sup>/<sub>4</sub> mile to a bus stop. Mitigating service would be available to by using modified bus routes. If the modifications of the route are not adopted, passengers will not experience an expansion of transit service access. In addition, there will not be an approximate 6 percentage increase in number residents' access to transit service.

### Conclusion

The major changes proposed as part of the EMR Phase II implementation meets the characteristics for a Disparate Burden and Disproportionate Impact. The designated levels are reached as a result of the proposed routes operating in low income and minority neighborhood and Census Tracts. However, the outlined service adjustments bus routes and the current structure of several existing bus routes has resulted in much of the service areas maintaining transit service or being within an approximate .5 mile walk to bus stop.

The EMR Phase II proposed implementation comprises of seven bus routes that will experience a major service changes. Two of the seven major changes included the proposed elimination of the bus route structures Route 45X and 25. Route 45X does not meet the Threshold Levels of Minority or Low Income. The proposal to discontinue the Route 45X is under consideration because of low performance. The service 55% less passengers per hour compared to other express bus routes. However, CATS provided mitigation for the passengers currently using the 45X. CATS modified the Route 62X Arboretum to service the most productive area of the 45X. The proposal to discontinue the Route 25 is also under consideration because of low performance. The Route 25 carries 68% less passengers per hour compared to similar services. CATS mitigated the loss of service for passengers by modifying seven bus routes. Only 9.2 % of the daily route miles will not be covered by an adjusted bus route.

CATS made a concerted effort to maintain service in the current route structure areas. Thus, proposed service adjustments realigned bus routes in neighborhoods and communities in order to take expand cross-town and suburb-to-suburb bus service, connections between different bus routes and between bus and light rail, and more direct service. If these proposal are not implemented it will gravely effects passengers ability to travel through the Charlotte Metro Area. CATS services heavily resemble the route structures that was implemented in 1959. According to the US Census, the population of Charlotte was 201,564 in 1960. The 2017 population is reported as 859,035. Although the population has significantly increased, the bus route service has remained relatively the same. The need to adjust bus services to meet the need to a growing city is essential to the stability to transit and its growth.

#### **Attachments**

Attachment #1- Route Census Information Attachment #2-CATS Minority Service Area Attachment #3 CATS Poverty Area Tracts with Routes Attachment #4 CATS Poverty Area Tracts with Routes and Stops Attachment #5 CATS Poverty Area Tracts Attachment #6 CATS Minority Service Area with Routes Attachment #7 CATS Minority Service Area with Routes and Stops