

## SECTION 7 - COLLECTION OF DEMOGRAPHIC DATA FOR TITLE VI CIVIL RIGHTS ASSESSMENT

*The following data is a demographic analysis of Spokane Transit's beneficiaries. STA creates demographic maps and tables utilizing the most accurate Census information available (2000). Although newer information is available through the U.S. Census Bureau's American Community Survey 5-year estimates, these estimates indicate an extremely high margin of error for many of the census tracts served by Spokane Transit Authority. Therefore, more accurate data from the 2000 Census has been used.*

### SECTION 7.1 – INTRODUCTION

In compliance with Title VI of the Civil Rights Act of 1964, the Spokane Transit 2011 Service Reduction Plan includes an analysis of the impacts of the proposed service changes on minority and low-income transit users. Section 601 of Title VI of the Civil Rights Act of 1964 states:

*No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.*

Spokane Transit provides regional public transportation service to many diverse communities throughout the Spokane Transit Public Transportation Benefit Area (PTBA). This analysis assessed the potential impacts to minorities and low-income transit users related to the 2011 service reductions.

Furthermore, 49 CFR Section 21.5(b)(2), 49 CFR Section 21.5(b)(7) and Appendix C to 49 CFR Part 21 require agencies to determine whether a major service change has a discriminatory impact on low-income and/or minority populations. STA's proposed 2011 service changes are classified as a major service change because the proposed system-wide reductions in excess of 5% of STA's total revenue hours, the threshold value for major service changes as defined on page 66 of the agency's 2010 comprehensive plan "Connect Spokane". The impacts of the proposed service changes were evaluated using Option A on Page V-5 of FTA Circular C 4702.1A (Title VI and Title VI-Dependent Guidelines for Federal Transit Administration Recipients, May 13, 2007).

**Based on a demographic analysis of existing ridership impacted by the proposed changes, it does not appear that the service reductions disproportionately affect minority or disadvantaged populations within the Spokane Transit PTBA. Service reductions that have potential impacts are discussed in the following section.**

## SECTION 7.2 – METHODOLOGY

Maps were developed which divide Spokane Transit Authority's service area into four subareas (North, South, Valley, and West Plains) to increase map detail for easier evaluation. These maps include depictions of both current transit service and changes which occurred between 2008 and 2010, including route eliminations and new or rerouted service. In areas where routes or route segments were eliminated without replacement of service, ridership data was reviewed to identify the potential impact of the service change for riders. Once these areas were identified, 2000 Census data were reviewed to identify census tracts with above average low-income and minority populations.

The following service area averages were used for evaluation:

Low-Income: According to the 2000 Census, 22% of all households within Spokane County reported income levels below 150% of the 1999 household poverty level. (The 1999 poverty level for 1-person households was \$8,240; for 4-person households, \$16,700.)

Minority: According to the 2000 Census, 91.4% of all Spokane County residents reported themselves to be White (single race). This equates to an 8.6% minority population.

Maps were evaluated to ensure no discriminatory impact on low-income and/or minority populations existed.

### SECTION 7.3.1 – NORTH SPOKANE: IMPACT OF SERVICE CHANGES ON LOW INCOME HOUSEHOLDS

During the 2008-2010 evaluation period, the following changes in service to North Spokane occurred:

ROUTE	SERVICE CHANGE (YEAR)
23 – Maple / Ash	Elimination of service to Hastings Park & Ride; Eliminated service covered by additional stops on Route 124 (2010)
27 – Crestline	Elimination of night and Saturday service to Francis/Market (2010)
29 – SCC	Service rerouted from South Crescent to Mission and Greene (2010)
35 – Five Mile P&R	Route eliminated (2010)

**EVALUATION: No discriminatory impact on low-income population.**

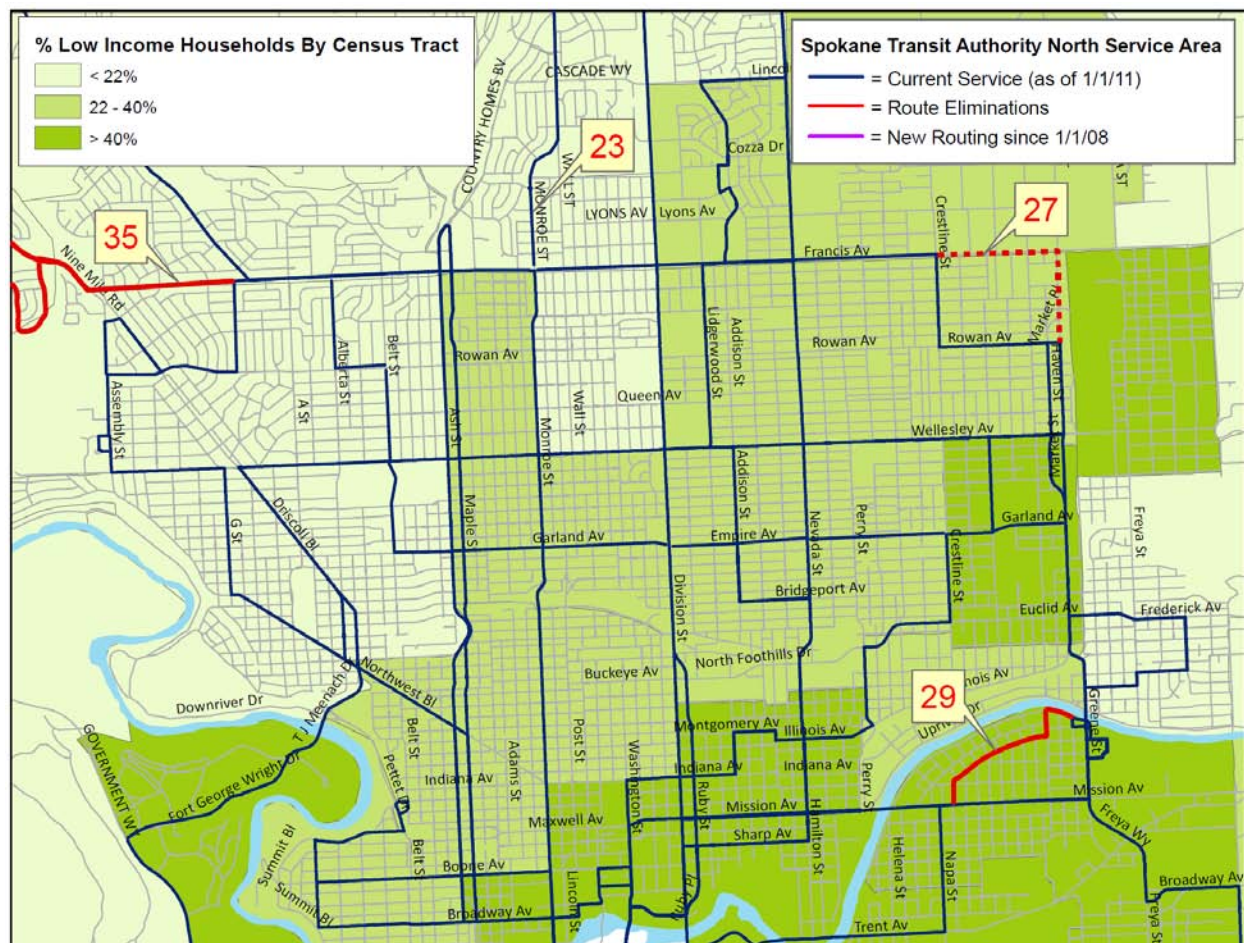


Figure 7.1 - Impact of North Spokane Service Changes on Low Income Households. (Note: 22% of all Spokane County households are low income. Source: 2000 Census.)

**SECTION 7.3.2 – NORTH SPOKANE: IMPACT OF SERVICE CHANGES ON MINORITIES**

During the 2008-2010 evaluation period, the following changes in service to North Spokane occurred:

ROUTE	SERVICE CHANGE (YEAR)
23 – Maple / Ash	Elimination of service to Hastings Park & Ride; Eliminated service covered by additional stops on Route 124 (2010)
27 – Crestline	Elimination of night and Saturday service to Francis/Market (2010)
29 – SCC	Service rerouted from South Crescent to Mission and Greene (2010)
35 – Five Mile P&R	Route eliminated (2010)

**EVALUATION: No discriminatory impact on minority population.**

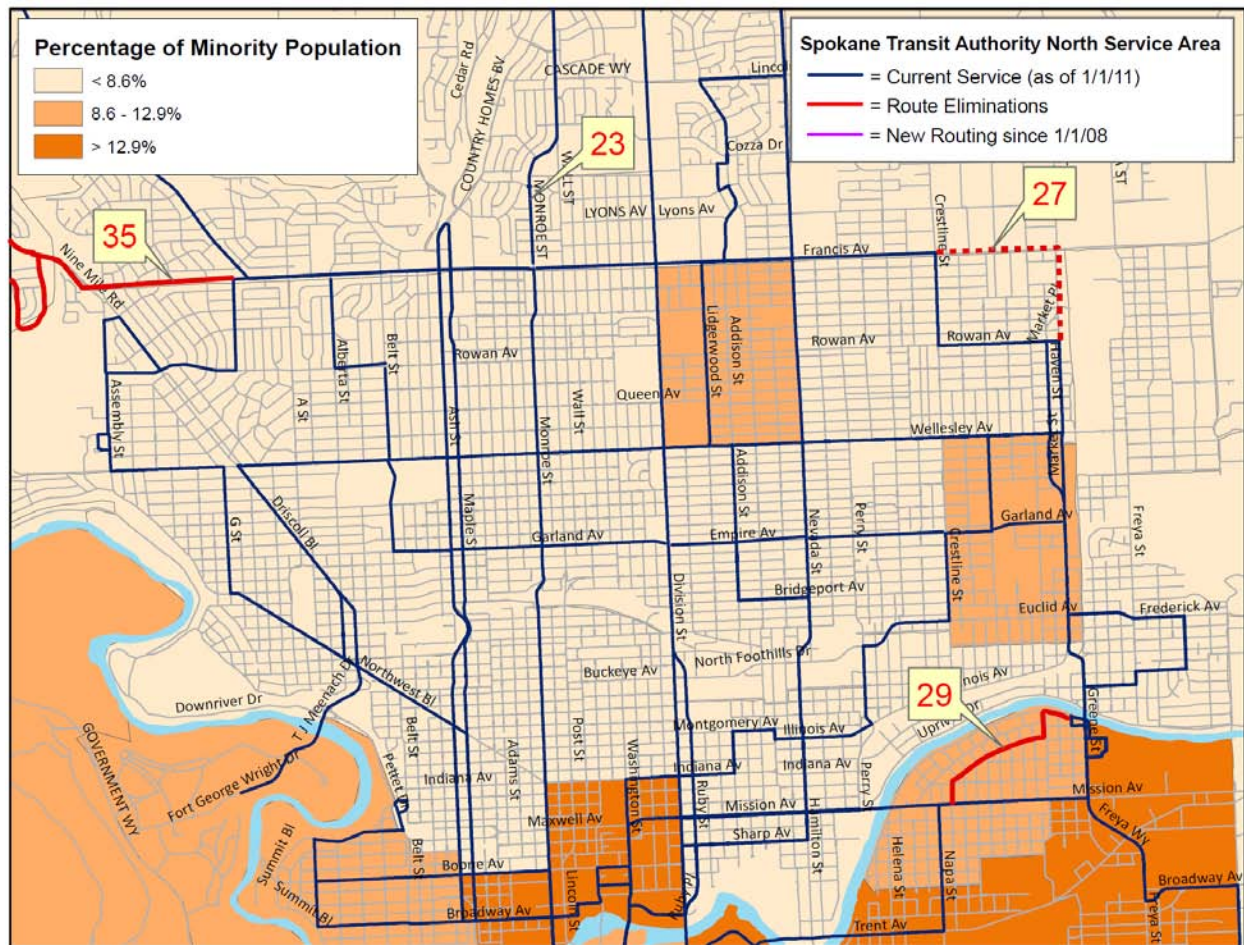


Figure 7.2 - Impact of North Spokane Service Changes on Minorities. (Note: 8.6% of all Spokane County residents are minorities. Source: 2000 Census.)

### SECTION 7.4.1 – SOUTH SPOKANE: IMPACT OF SERVICE CHANGES ON LOW INCOME HOUSEHOLDS

During the 2008-2010 evaluation period, the following changes in service to South Spokane occurred:

ROUTE	SERVICE CHANGE (YEAR)
2 – Southside Medical Shuttle	Minor routing change near Deaconess (2010)
20 – SFCC	Elimination of night service to Clarke / Peaceful Valley (2010)
40 – Browne’s Addition	Route eliminated; largely replaced by Routes 60 & 61 (2009)
44 – 29 <sup>th</sup> Avenue	Elimination of night and Saturday service to Bernard (2010)
47 – Glenrose	Route eliminated (2010)

Service changes are well distributed across the service area with regard to income levels.

**EVALUATION: No discriminatory impact on low-income population.**

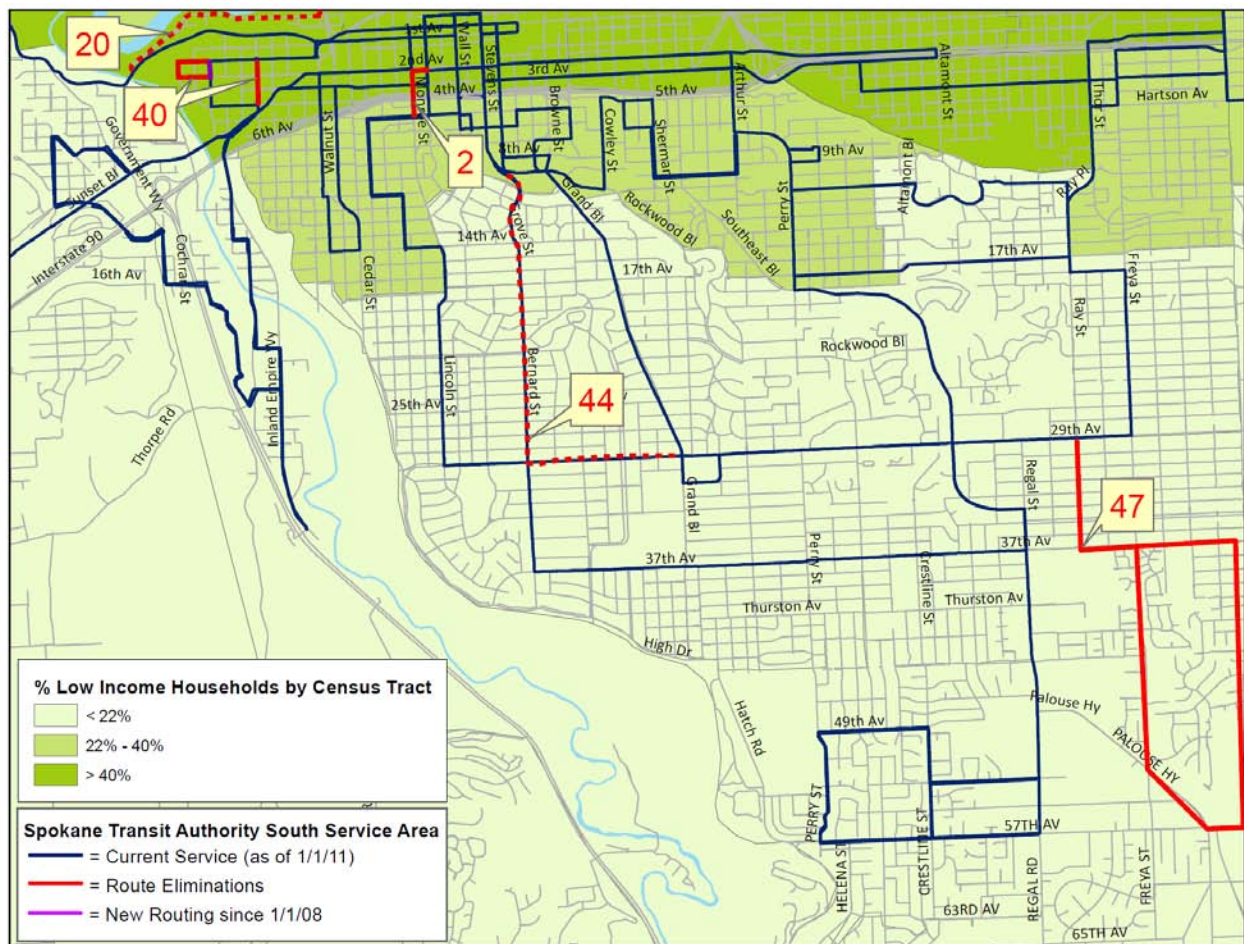


Figure 7.3 - Impact of South Spokane Service Changes on Low Income Households. (22% of all Spokane County households are low income. Source: 2000 Census.)

**SECTION 7.4.2 – SOUTH SPOKANE: IMPACT OF SERVICE CHANGES ON MINORITIES**

During the 2008-2010 evaluation period, the following changes in service to South Spokane occurred:

ROUTE	SERVICE CHANGE (YEAR)
2 – Southside Medical Shuttle	Minor routing change near Deaconess (2010)
20 – SFCC	Elimination of night service to Clarke / Peaceful Valley (2010)
40 – Browne’s Addition	Route eliminated; largely replaced by Routes 60 & 61 (2009)
44 – 29 <sup>th</sup> Avenue	Elimination of night and Saturday service to Bernard (2010)
47 – Glenrose	Route eliminated (2010)

Service changes are well distributed across the service area with regard to size of minority population.

**EVALUATION: No discriminatory impact on minority population.**

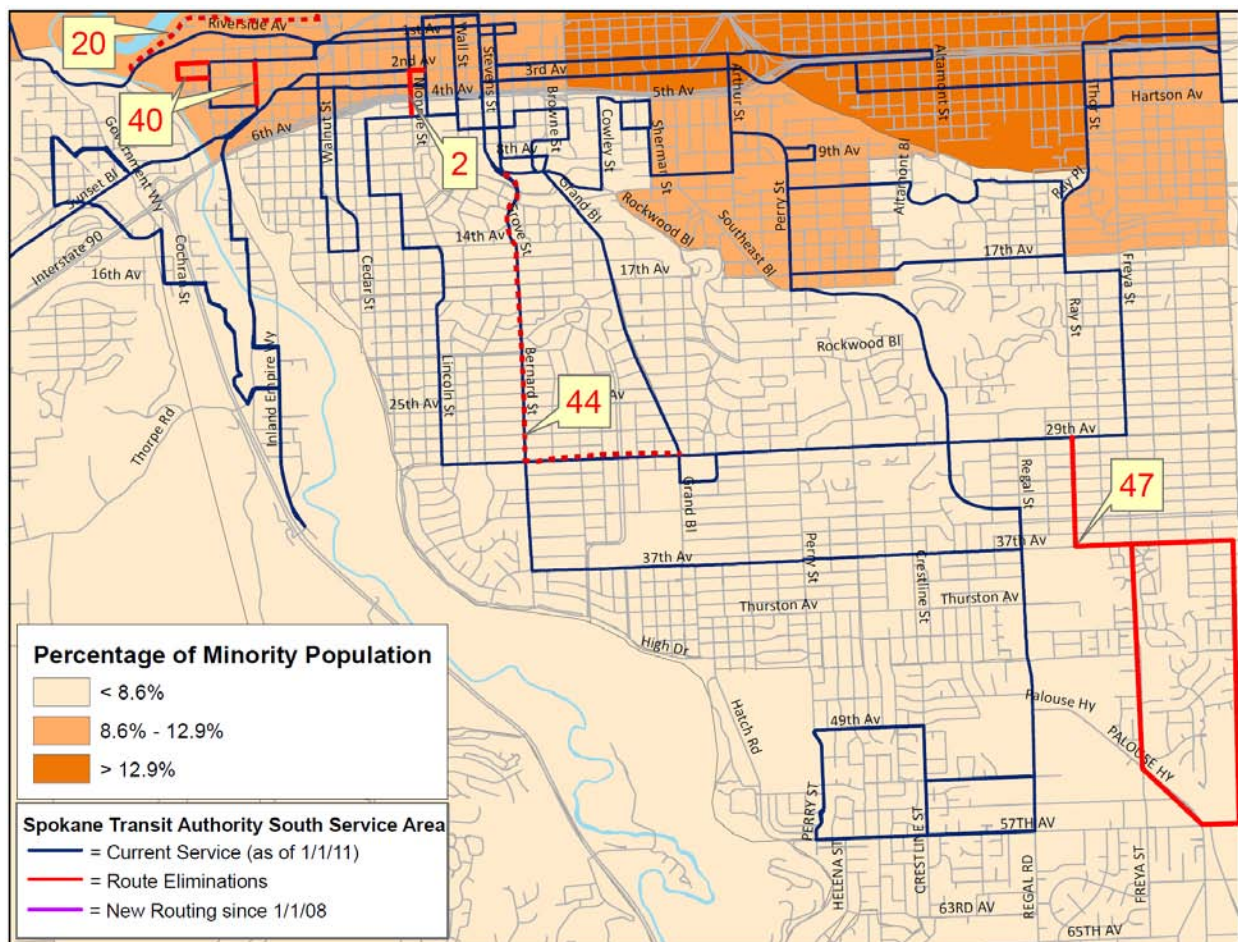


Figure 7.4 - Impact of South Spokane Service Changes on Minorities. (Source: 2000 Census.)

### SECTION 7.5.1 – WEST PLAINS: IMPACT OF SERVICE CHANGES ON LOW INCOME HOUSEHOLDS

During the 2008-2010 evaluation period, the following changes in service to the West Plains occurred:

ROUTE	SERVICE CHANGE (YEAR)
60 – Airport / Browne’s Addition	Route created; routing serves portions of eliminated Route 64 (2009)
61 – Highway 2 / Browne’s Add.	Minor routing changes (closure of McFarlane Road) (2009)
64 – Airport via Geiger	Route eliminated; largely replaced by Routes 60 and 67 (2009)
67 – Medical Lake / Geiger	Route created; routing serves portions of eliminated Route 64 (2009)

**EVALUATION: No discriminatory impact on low-income population.**

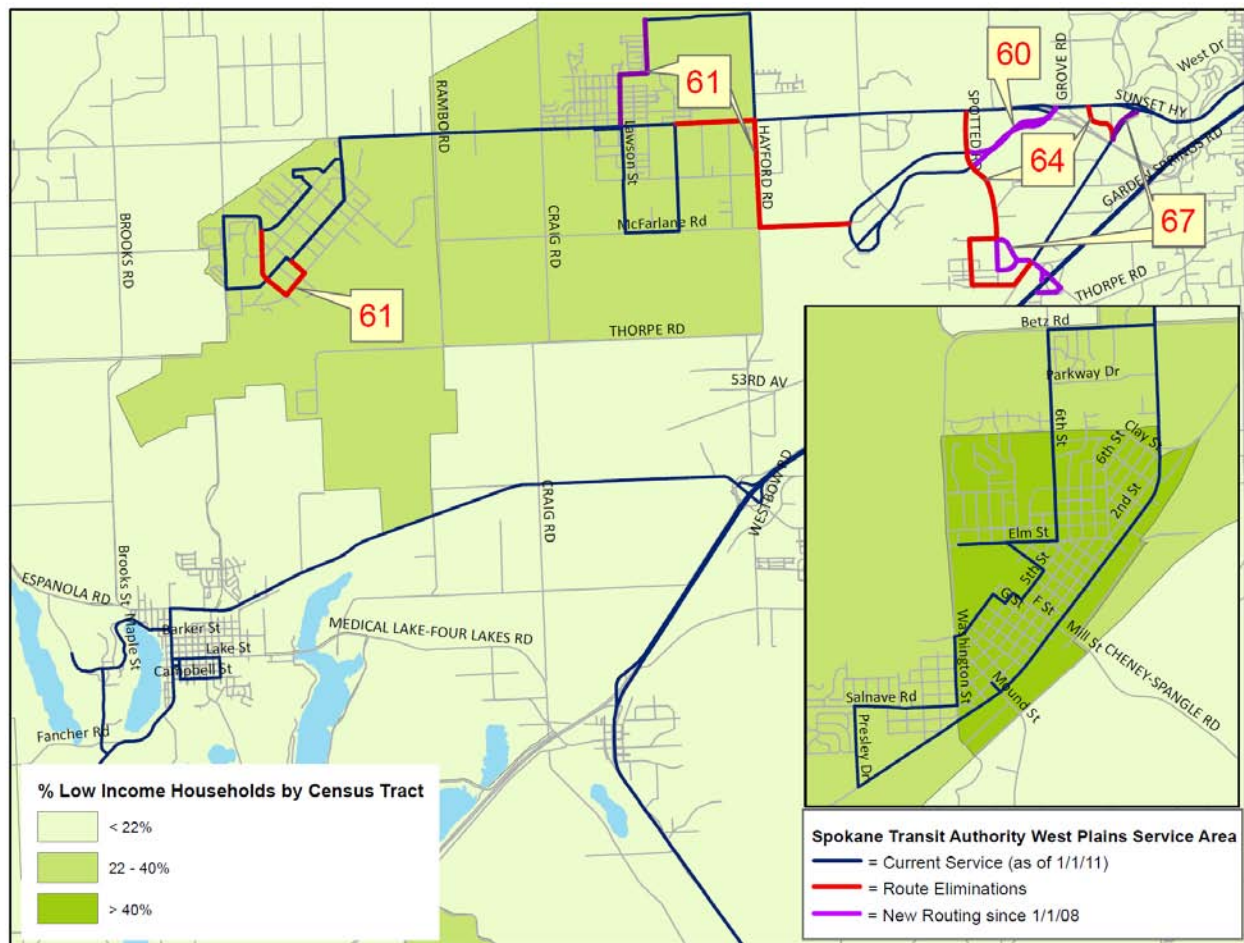


Figure 7.5 - Impact of West Plains Service Changes on Low Income Households. (22% of all Spokane County households are low income. Source: 2000 Census.)

### SECTION 7.5.2 – WEST PLAINS: IMPACT OF SERVICE CHANGES ON MINORITIES

During the 2008-2010 evaluation period, the following changes in service to the West Plains occurred:

ROUTE	SERVICE CHANGE (YEAR)
60 – Airport / Browne’s Addition	Route created; routing serves portions of eliminated Route 64 (2009)
61 – Highway 2 / Browne’s Add.	Minor routing changes (closure of McFarlane Road) (2009)
64 – Airport via Geiger	Route eliminated; largely replaced by Routes 60 and 67 (2009)
67 – Medical Lake / Geiger	Route created; routing serves portions of eliminated Route 64 (2009)

**EVALUATION:** Although there likely was an impact on minority populations, these changes resulted in increased ridership levels. Therefore, the changes were not considered to be discriminatory.

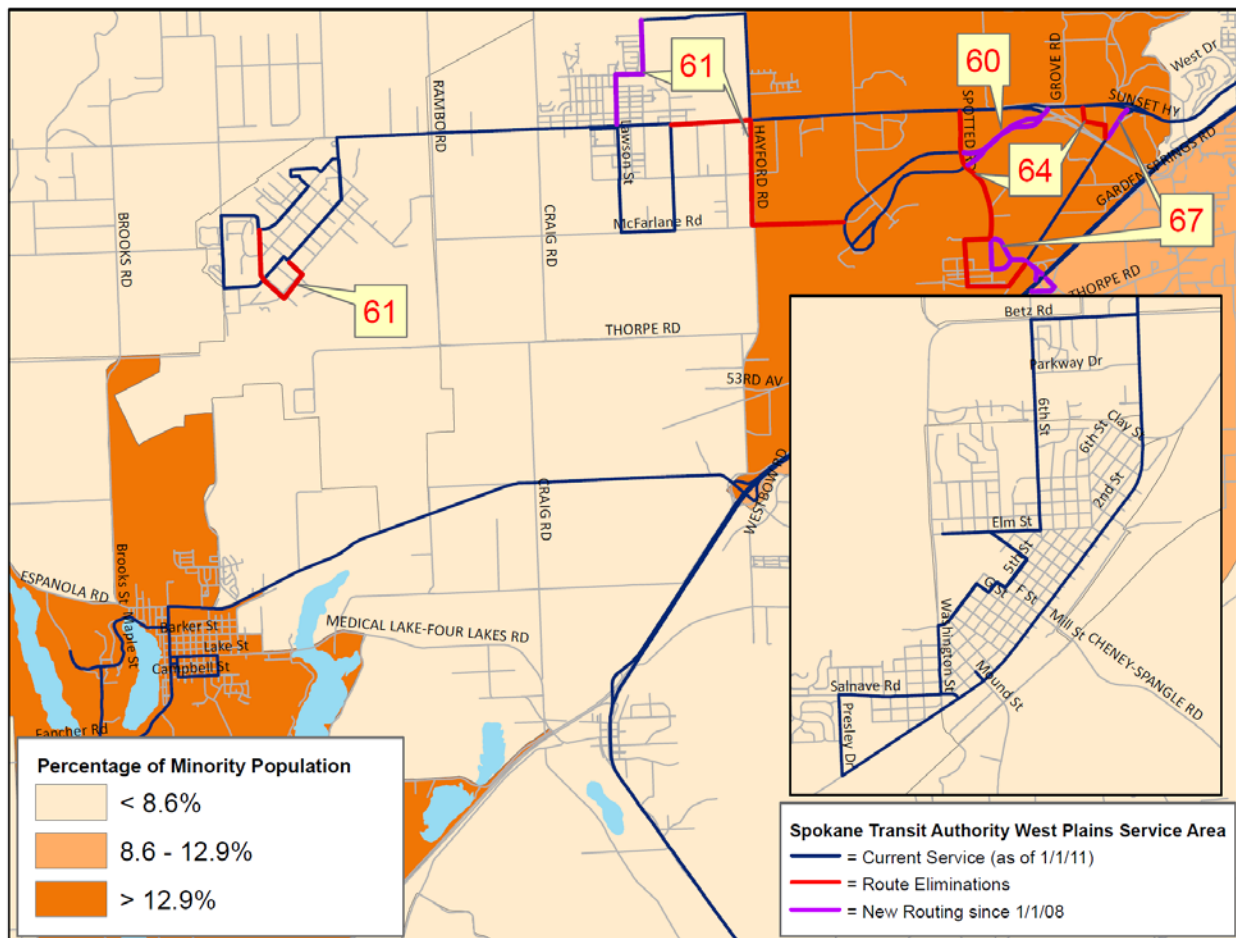


Figure 7.6 - Impact of West Plains Service Changes on Minorities. (Source: 2000 Census.)

### SECTION 7.6.1 –SPOKANE VALLEY: IMPACT OF SERVICE CHANGES ON LOW INCOME HOUSEHOLDS

During the 2008-2010 evaluation period, the following change in service to Spokane Valley occurred:

ROUTE	SERVICE CHANGE (YEAR)
32 – Trent / Indiana	Minor routing change due to construction on Montgomery Avenue (2008)

Although the service change occurred in an area of below average income, the change occurred for operational reasons only.

**EVALUATION: No discriminatory impact on low-income population.**

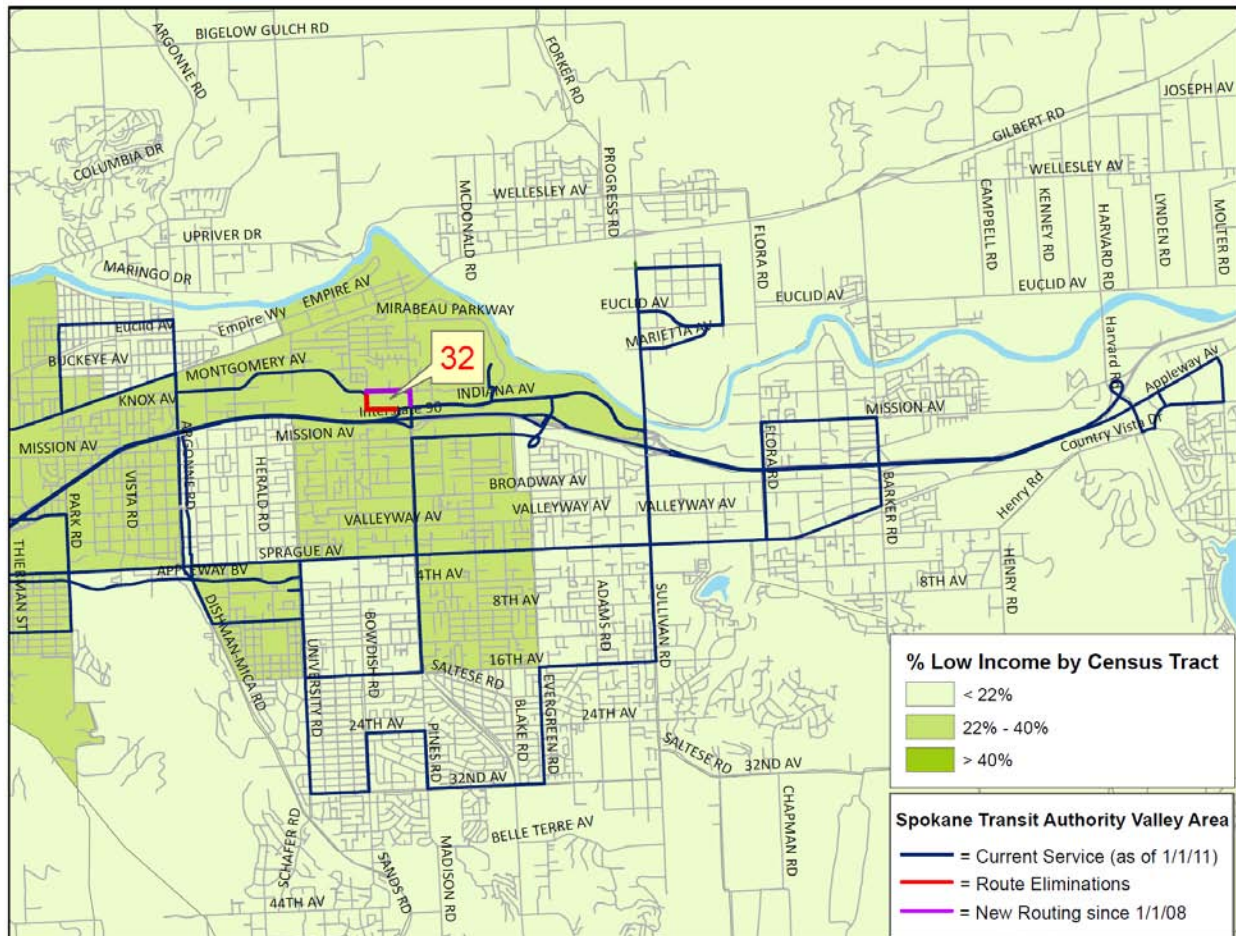


Figure 7.7 - Impact of Spokane Valley Service Changes on Low Income Households. (22% of all Spokane County households are low income. Source: 2000 Census.)

**SECTION 7.6.2 –SPOKANE VALLEY: IMPACT OF SERVICE CHANGES ON MINORITIES**

During the 2008-2010 evaluation period, the following change in service to Spokane Valley occurred:

ROUTE	SERVICE CHANGE (YEAR)
32 – Trent / Indiana	Minor routing change due to construction on Montgomery Avenue (2008)

No census tract within this study area has a larger-than-average minority population.

**EVALUATION: No discriminatory impact on minority population.**

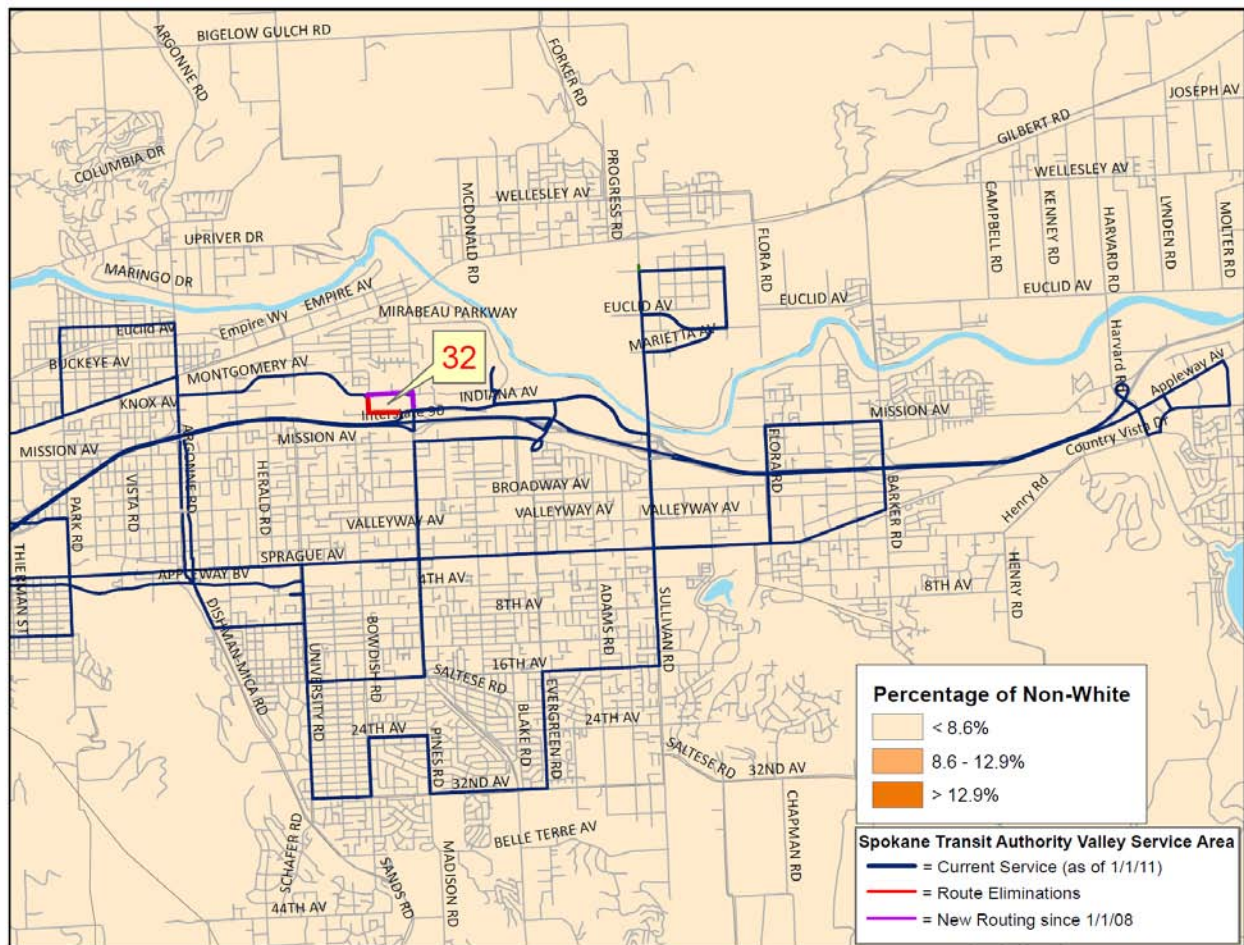


Figure 7.8 - Impact of Spokane Valley Service Changes on Minorities. (Source: 2000 Census.)

**Resources**

- 2000 U.S. Census (Tracts, Income and Minority Data)
- 2010 GFI Fare Collection data (Ridership by Route)
- 2010 Transit Monitoring Survey data (Stop by Stop Ridership Detail)
- 2010 Connect Spokane (Spokane Transit Authority Comprehensive Plan)