

2016 Title VI Plan



**StarTran
Public Works & Utilities
City of Lincoln, Nebraska**

The preparation of this report is in response to the Federal Transit Administration (FTA) requirements set forth in Circular C4702.1B

September 2016

StarTran Title VI Plan – 2016

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Introduction

The following report has been prepared in response to the Federal Transit Administration (FTA) requirements set forth in Circular 4702.1B, pertaining to compliance with Title VI provisions of the 1964 Civil Rights Act. FTA Circular 4702.1B, was released by the Federal Transit Administration (FTA) on October 1, 2012.

Section 601 of the Title VI of the Civil Rights Act of 1964 states the following:

“No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participating in, or denied the benefits of, or be subject to discrimination under any program, or activity receiving federal financial assistance.”

The grantee must ensure that Federally supported transit services and related benefits are distributed in an equitable manner. This report documents StarTran’s compliance with Circular 4702.1B.

StarTran is organized as a division of the City of Lincoln’s Public Works and Utilities Department. The StarTran General Manager reports to the Director of Public Works and Utilities, who reports directly to the Mayor and City Council. Policy and funding decisions are made by the Mayor and Council. There is a seven-member StarTran Advisory Board that provides guidance to the Mayor and Council concerning transit issues and operations.

General Reporting Requirements

1. Title VI Notice to the Public

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.

Attachment A is StarTran's Title VI notice to the public that notifies the public of its rights under Title VI. This notice is posted on the City of Lincoln website and at StarTran's office area, where patrons come to obtain fare devices and other information and in the interior of all buses and paratransit vehicles. This notice also includes the contact information of the Federal Transit Administration at:

Federal Transit Administration, Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor - TCR
1200 New Jersey Ave., SE
Washington, DC 20590
http://www.fta.dot.gov/civilrights/title6/civil_rights_5104.html

2. Title VI Complaint Procedures and Complaint Form

All FTA 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 at: <http://lincoln.ne.gov/city/pworks/startran/titlevi.htm>

StarTran's Title VI complaint procedure and complaint form is found in attachment B. Based on the threshold requirements of the Safe Harbor Provision the Title VI complaint form and Notice to the Public is translated in Spanish, Vietnamese and Arabic.

3. Transit-Related Title VI Investigations, Complaints and Lawsuits.

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. This list shall be included in the Title VI Program submitted to FTA every three years.

The City of Lincoln Law Department maintains a list of all such investigations. All written complaints received and responses from the City are retained for at least three years. For

the past three years there have been no Title VI Investigations, Complaints or Lawsuits for StarTran.

4. Public Participation Plan

Per 4702.1B, "Recipients have wide latitude to determine how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate. Recipients should make these determinations based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available. Efforts to involve minority and LEP populations in public participation activities can include both comprehensive measures, such as placing public notices at all transit stations, stops, and vehicles, as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in a recipient's decision-making process."

StarTran's public engagement strategies include:

a. Scheduling meetings at times and locations that are convenient and accessible for minority and LEP communities. For StarTran public hearings on fare or service changes are scheduled during convenient times and at the downtown Senior Center at 1010 "O" Street which is in close proximity to StarTran's bus transfer center at 11th & "O".

For those who are unable to make it to the public meetings patrons may write, e-mail or telephone StarTran with their comments regarding the proposed revision.

Monthly StarTran Advisory Board meetings are held at the StarTran office which is in close proximity to three StarTran bus routes. All StarTran Advisory Board meetings are governed by the Open Meetings Act, are open to the public and held at times that are generally convenient to the Board members and the general public.

b. For public hearings on fare or service changes, StarTran allows maximum input from the public by setting reasonable time limits for speakers so as to allow everyone to participate if they want to and prevents others from monopolizing the meeting in addition to arranging the meetings at convenient times and locations.

Other key organizations that StarTran will coordinate with are: Lincoln Literacy Council, Lincoln Asian Center, Center for People in Need, Good Neighbor Center, Los Centros de Americas, City Mission and Community Action Partnership.

d. Sending communication to agencies that serve minority and LEP populations. For the November 2015 TDP public hearing notice of the meeting was translated in Spanish and Vietnamese and sent to organizations that serve these populations. Such translated documents were also put on our website.

For future public meetings StarTran will reach out to more organizations that represent minority & LEP populations such as Lincoln City Mission, Lincoln Literacy Council, New Americans Task Force, Lincoln Asian Center, Center for People in Need, Good Neighbor Center, Los Centros de Americas and Community Action Partnership.

e. Providing timely notice and access to information about StarTran changes. Public information is available on StarTran’s website and on StarTran’s facebook page. For fare or service changes public notices are placed on the website, bus shelters and in the local newspaper well in advance of the pending change. Those registered with RSS feeds are sent such information as well. Public Notices are placed in the local newspaper and Ride for \$8 Bus Pass outlets.

Outreach efforts since the last Title VI Plan submission include: scheduling events at convenient times and at transit-accessible locations. Public hearing notices are sent to agencies such as the Asian Center and El Centro de Las Americas, which serve minority and LEP populations.

5. LEP

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).

See attachment G for StarTran’s LEP Plan

6. Minority Representation on Boards or Committees

Per 4702.1B, “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.”

The recipient, the City of Lincoln/StarTran, has a StarTran Advisory Board that provides guidance to the Mayor and Council concerning transit issues and operations. Provided is a table depicting the racial breakdown of this Board:

Members	Race				
	African - American	Asian/Pacific Islander	Native American Indian	Hispanic/ Latino	Caucasion/ White
Lucs					X
Banks	X				
DeKalb					X
Carter					X
Hatten					X
Hellbusch					X
Bergman					X

Membership current as of August 23, 2016

The efforts made to encourage the participation of minorities on such committees include the City of Lincoln coordination with "Project A.L.L.". The purpose of Project A.L.L. is to equip, encourage, and recruit diverse individuals for meaningful roles of governance and service on governmental and non-profit boards in Lincoln and Lancaster County. Project A.L.L. is contacted by the Mayor's Office when vacancies on city boards and committees occur to secure/encourage minority participation on such boards and committees.

7. Subrecipient Compliance

"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."

The City of Lincoln/StarTran, the direct recipient of FTA funds, does not have any subrecipients. StarTran contracts with, but does not award funds, to third parties. A subrecipient is any entity that receives Federal assistance awarded by a FTA Recipient, rather than FTA directly. The term "subrecipient" also includes the term "subgrantee," but does not include "third party contractor" or "third party subcontractor."

8. Equity Analysis for Construction Facility

If the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.

StarTran has not constructed a facility in the past three years that would require a Title VI equity analysis.

9. System-Wide Service Standards and Policies

FTA requires all fixed route transit providers of public transportation to develop quantitative standards for the following indicators:

a) Vehicle load: Passengers should be seated except for short periods of time associated with peak load periods. 25% standees for short periods are acceptable.

Vehicle Type	Seated	Standing
30' Low Floor Bus	26	18
35' Low Floor Bus	32	24

b) Vehicle headways: Service operates Monday – Friday with 30 minute service during peak periods and 60 minute service during mid-day. Saturday service operates 60 minutes all day. Two weekday routes, the Holdrege and Vine operate, Monday – Friday, with 10 minute service all day and 20 minute service during the evening hours.

c) On-time performance: Ninety five (90) percent of the trips should run on-time (not more than 7 minutes late).

d) Service availability:

High density areas within a ¼ mile of a bus route, major activity centers and employer concentrations of 200 or more employees shall be provided with transit service.

FTA requires fixed route transit providers to develop a policy for each of the following service indicators:

a) Distribution of transit amenities: the standard for installation of bus waiting shelters generating 15 or more daily boardings, and a bench is 10 or more daily boardings.

b) Vehicle Assignment: StarTran's process for vehicle assignment is based on the larger seating capacity buses (32 seat buses) being assigned to the higher ridership routes and the lower ridership routes are assigned the smaller seating buses, or the 26 seat buses. All buses are low-floor style, wheelchair accessible, have operating heat and air conditioning, have security cameras and audio equipment and are all in good operating condition.

10. Requirement to submit a Title VI Program

According to 4702.1B, "FTA requires that all recipients document their compliance by submitting a Title VI Program to their FTA regional civil rights officer once every three years or as otherwise directed by FTA. The Title VI Program must be approved by the transit provider's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA. Transit providers shall submit a copy of the board resolution, meeting minutes, or similar documentation with the Title VI Program as evidence that the board of directors or appropriate governing entity or official(s) has approved the Title VI Program."

The City of Lincoln Mayor, who is responsible for policy decisions for StarTran, approved the Title VI Plan and Service Equity Analysis through Executive Order on _____, 2016. Attachment E is the Executive Order. *To be attached prior to submittal to FTA.*

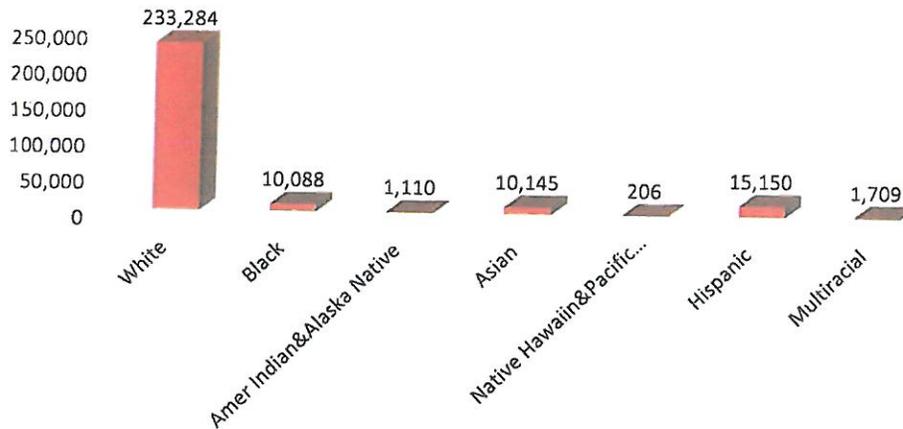
Minority Map and Poverty Map

Attached, for illustrative purposes, is Attachment C, "StarTran System & Minority Map" and Attachment D "StarTran System & Poverty Map". These maps use Census data and shows, fixed transit facilities and major activity centers or transit trip generators and StarTran fixed routes. For the Minority Map the shaded areas show the percentage of total minority exceeds the average (City Average 14.1%) minority population for the service area as a whole. For the Poverty Map the shaded areas show the percentage of total poverty exceeds the average (City Average 16.2%) poverty population for the service area as a whole. Poverty based on Health & Human Services Poverty Levels. On both maps the shaded areas are well represented by StarTran bus routes.

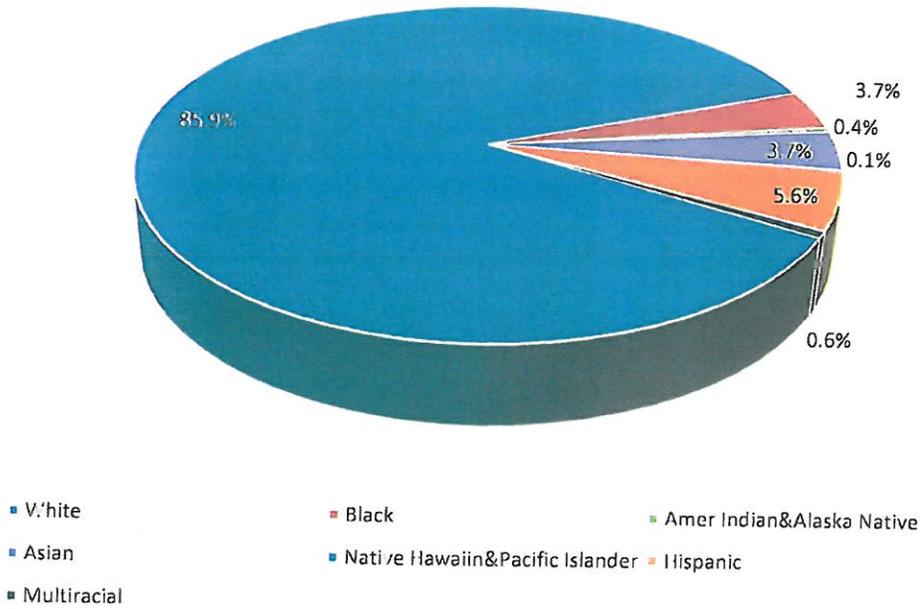
Additional Requirements for Transits Over 50 Vehicles Peak Service & 200,000 Population in Urbanized Area

1. Demographic and Service Profile Maps and Charts

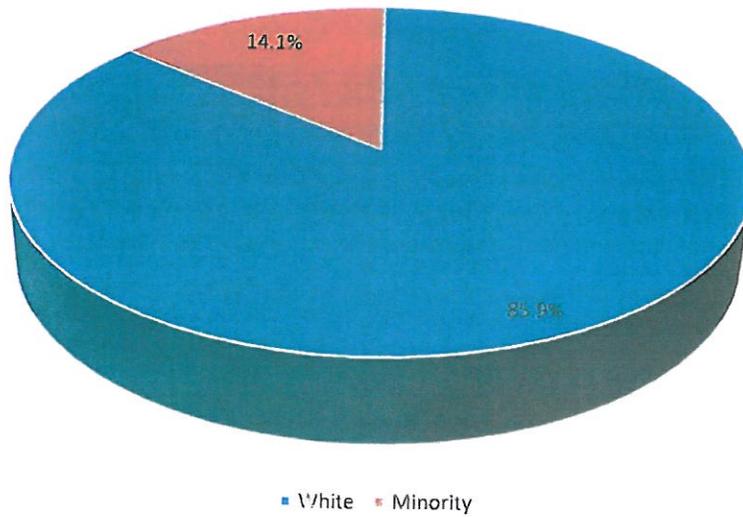
StarTran Service Area Population Breakdown by Race (2010-14 ACS)



StarTran Service Area Population Percentage Breakdown By Race (2010-14 ACS)



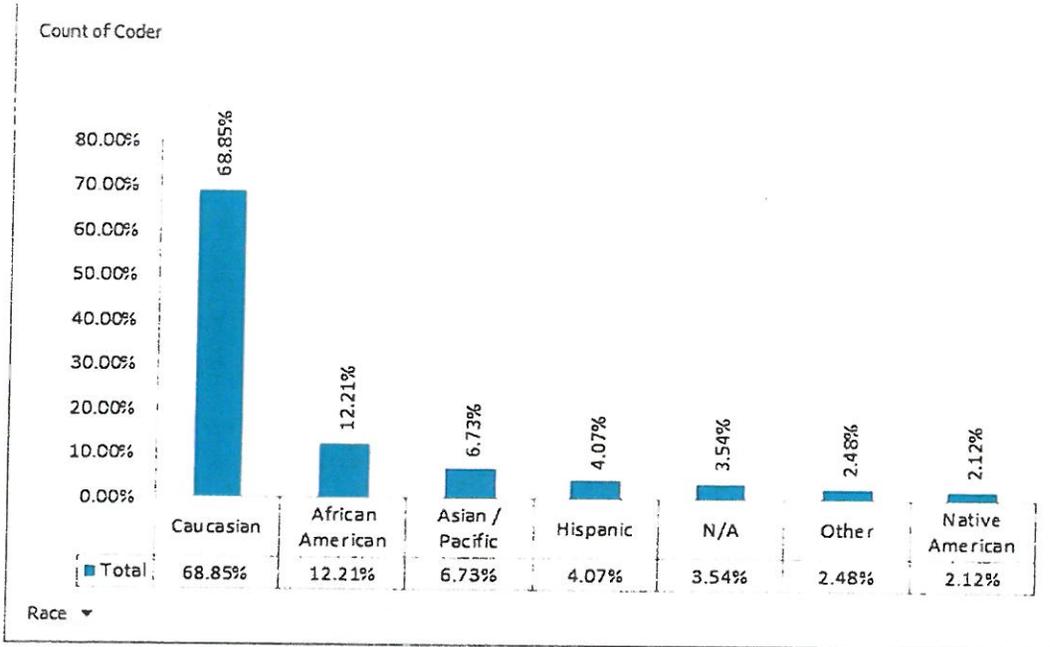
StarTran Service Area Minority Population Percentage (2010-14 ACS)



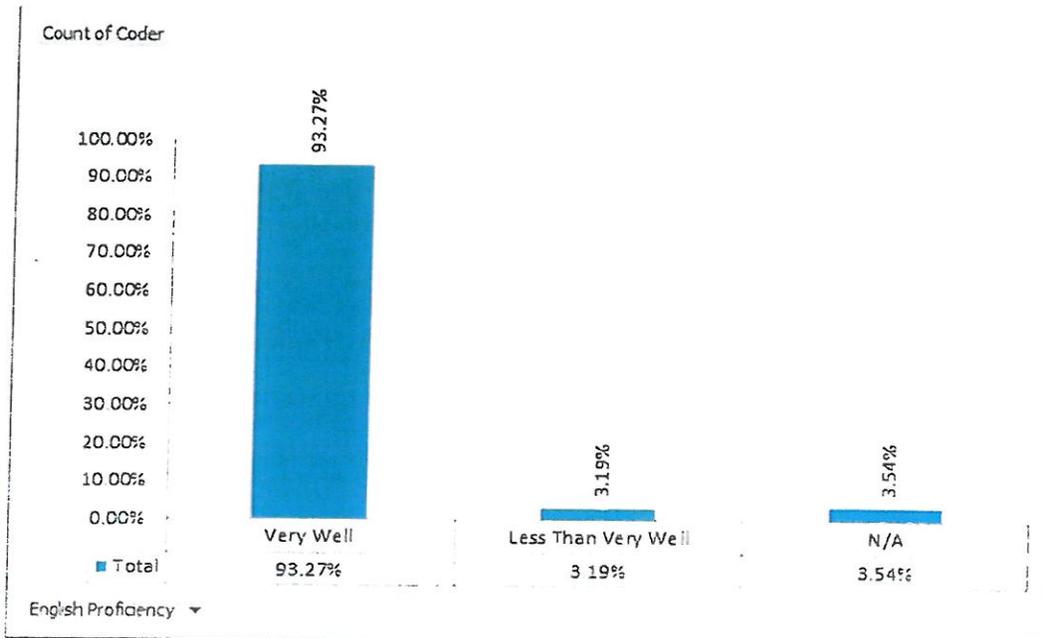
2. Demographic Ridership and Travel Patterns

StarTran conducted an on-board survey in October 2013 that collected information on trip purpose, origin and destination, trip frequency, rider satisfaction and demographic data provided below:

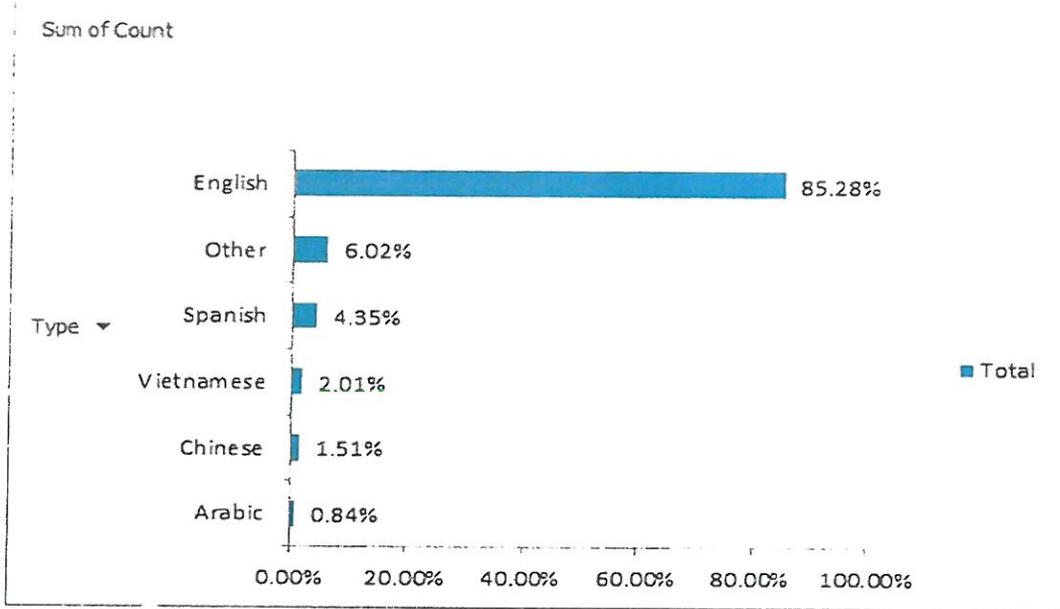
Race:



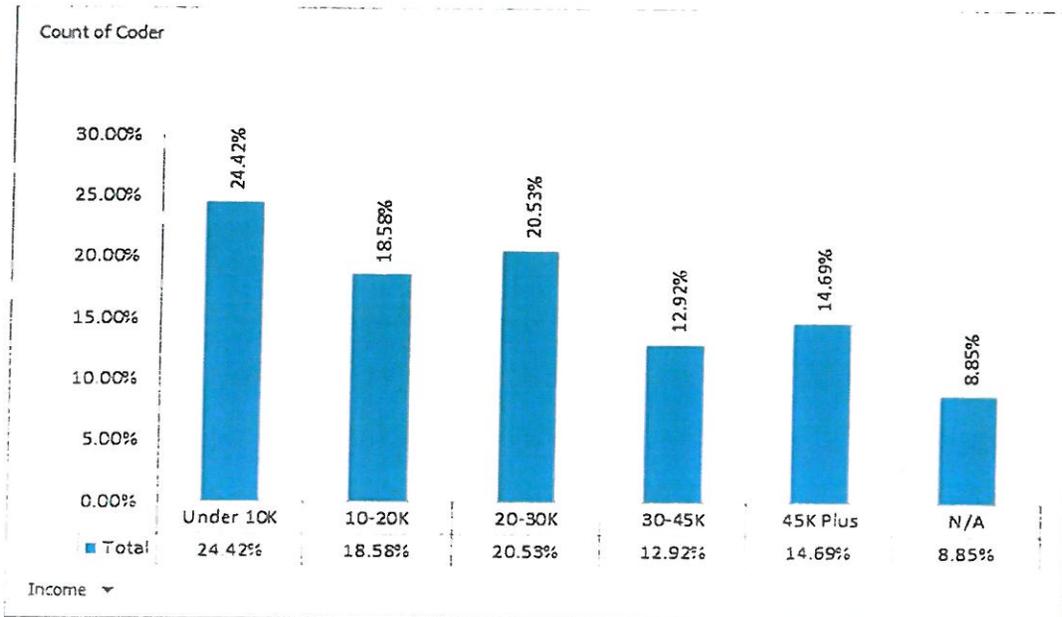
English Proficiency



Languages Spoken at Home:

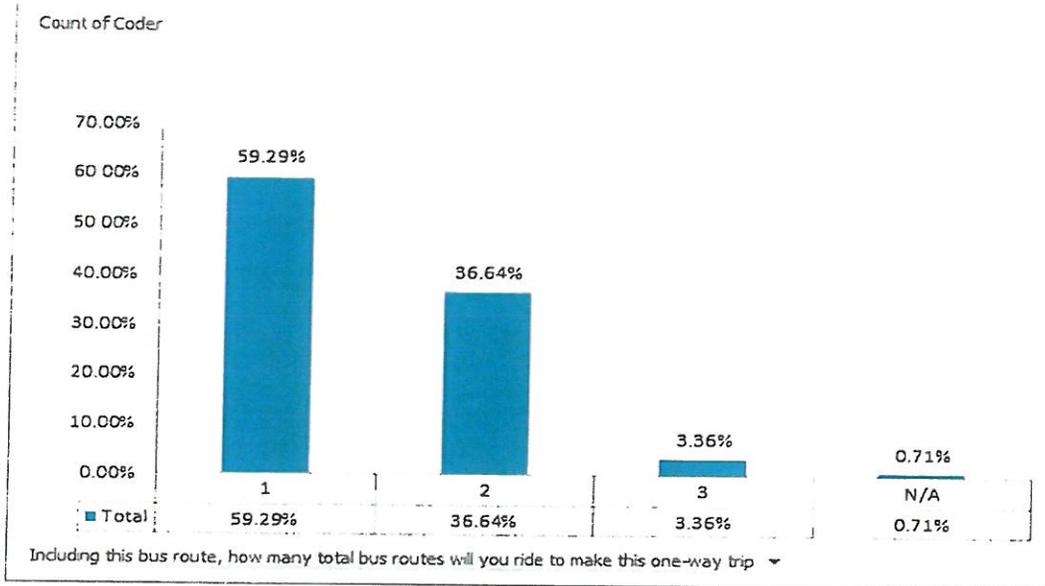


Household Income:

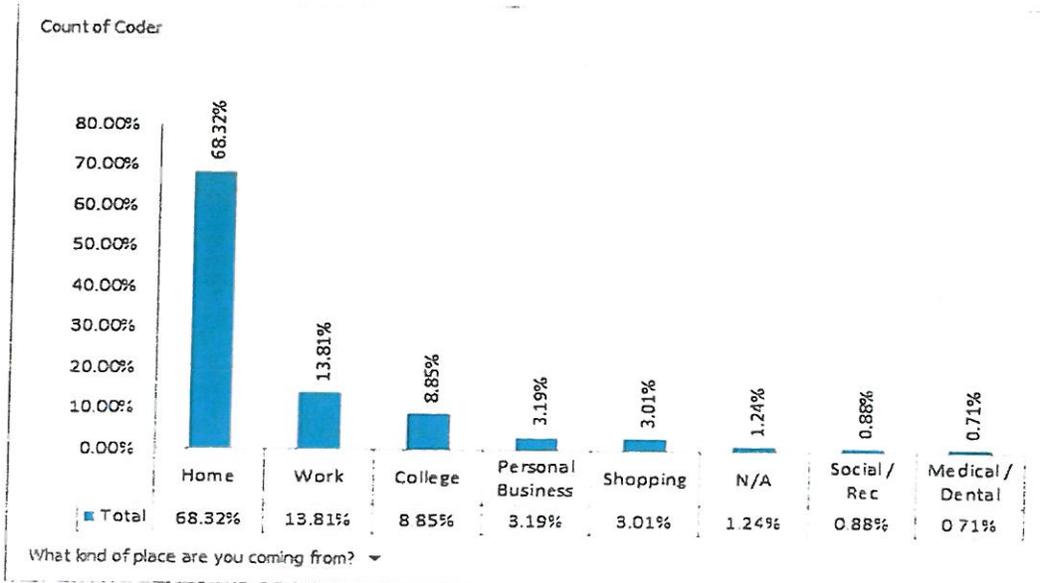


Travel Patterns

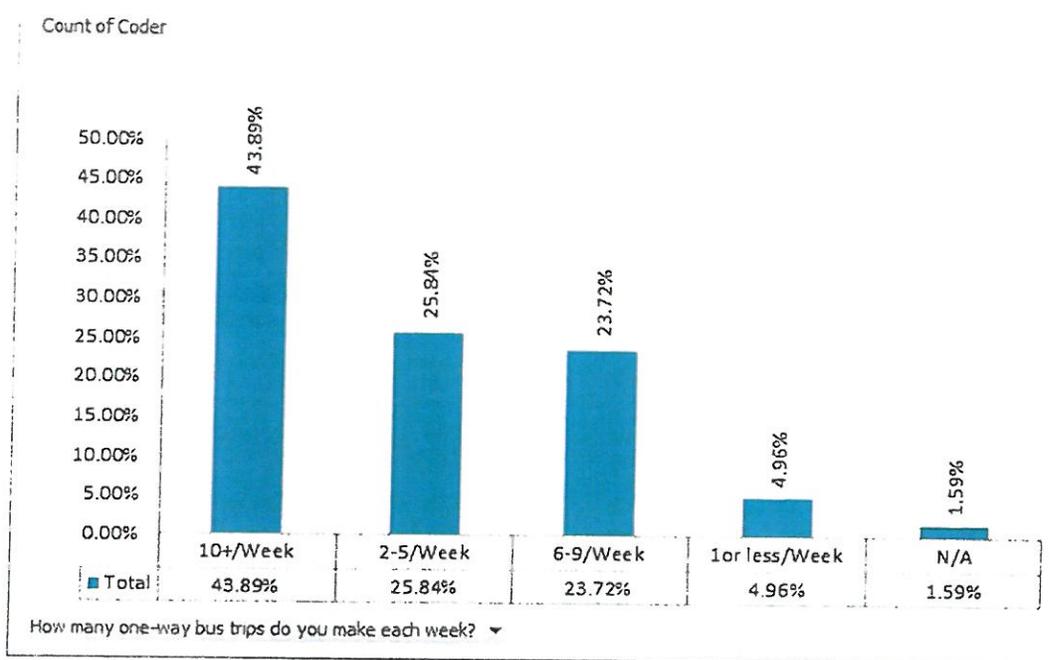
A. Bus Routes taken to make one-way trip



B. Trip Purpose



C. Trip Frequency



Survey Comments:

The surveys distributed in 2013 were also translated in Spanish.

For the household income questions the categories of income did not accurately match the HHS Poverty categories. StarTran will distribute another on-board survey in Fall of 2017 that will accurately capture household income data.

3. Results of Monitoring Program of Service Standards

Weekday Route Network Frequency

Route Name	Peak Frequency	Midday Frequency	Daily Trips
22 NIC City	7 minutes	7 minutes	84
23 NIC East	20 minutes	20 minutes	32
24 Holdrege	10 minutes	10 minutes	76
25 Vine	10 minutes	10 minutes	76
41/40 Havelock/Heart Hospital	30 minutes	60 minutes	21
42/43 Bethany/Normal	30 minutes	60 minutes	20
44 O Street Shuttle	30-40 minutes	60-70 minutes	18
45 Arapahoe/46 Arnold Heights	30 minutes	60 minutes	21
47/48 Belmont Salt Valley	30 minutes	60 minutes	20
49/50 University Place/College View	30 minutes	60 minutes	20
51/52 West A/Gaslight	60 minutes	120 minutes	9
53 SouthPointe	30 - 40 minutes	60 - 70minutes	20
54 Veteran's Hospital	30 - 40 minutes	60 - 70 minutes	16
55 Star Shuttle	15 minutes	15 minutes	50

Saturday Route Network Frequency

Route Name	Frequency	Daily Trips
41/40 Havelock/Heart Hospital	60 minutes	12
42/43 Bethany/Normal	60 minutes	12
44 O Street Shuttle	60 minutes	12
46 Arnold Heights	60 minutes	12
47/45 Belmont /Arapahoe	60 minutes	12
49 University Place	60 minutes	12
50 College View	60 minutes	12
51/52 West A/Gaslight	120 minutes	6
54 Veteran's Hospital	60 minutes	12

Schedule adherence by route

Route Name	90% Of Trips
22 NIC City	71%
23 NIC East	94%
24 Holdrege	47%
25 Vine	69%
41 Havelock	68%
40 Heart Hospital	57%
42 Bethany	64%
43 Normal	68%
44 O Street Shuttle	60%
45 Arapahoe	69%
46 Arnold Heights	59%
47 Belmont	61%
48 Salt Valley	69%
49 University Place	58%
50 College View	67%
51 West A	79%
52 Gaslight	75%
53 SouthPointe	67%
54 Veteran's Hospital	53%
55 Star Shuttle	59%

Provided on the next page is the summary of results from the annual Transit Surveillance Report. This annual report affords staff, recommending groups, and decision makers a rational and systematic means for evaluation of current transit services, and for estimating the results of any potential service changes resultant from this evaluation.

The preparation of this report is in response to requirements set forth in Circular C4702.1B. Further, per Section 2.38.090 of the Lincoln Municipal Code "the StarTran Advisory Board shall annually review an evaluation of the transit performance standards and service goals described in the current 'Transit Development Plan' (TDP). Upon completion of each annual review, the advisory board shall forward its recommendation, if any, to the Director of Public Works and Utilities, who shall forward the recommendations to the Mayor and City Council as appropriate."

Attachment F is verification of Service Standards and Policies

StarTran Performance versus Service Standards

Category	Standard	StarTran Results
<i>Service Coverage</i>		
Availability	Residential Areas - high density areas within ¼ of a bus route - Route spacing guide presented on page 6 - Major activity centers - Employers or employment concentrations of 200 or more employees - Health centers - Middle and high schools - Colleges/universities - Shopping centers of over 25 stores - Social service/government centers	- 77.4% of population is located within a quarter mile of a bus route - Routes meet spacing guide - Most activity centers served
Frequency	Arterial Routes - 30 minute peak - 60 minute off-peak Crosstown/neighborhood/shuttle services - 60 minute all day service	- 17 out of 19 weekday routes meet peak & off-peak standard - 11 out of 13 Saturday routes meet standard
Span	-5 AM to 10 PM on weekdays -6 AM to 7 PM on Saturdays	- The weekday routes operate until 7:10 PM, which does not meet the standard. Based on current funding expanding the service span to 10:00 PM is not feasible at this time - All Saturday routes meet standard
Directness	- Maximum 25% of transfer rate	- 36% transfer rate, does not meet standard
<i>Patron Convenience</i>		
Speed	-Regular routes maximum of 15 MPH -Maximum of 10 MPH for Downtown Shuttle -12-18 MPH for outlying services depending on layout	-Regular routes slightly exceed standard - Star Shuttle meets standard.
Loading	-25% standees for short periods acceptable *	- Meets standard
Bus Stop Spacing	- 5 to 7 stops per mile in core (every other block) - Fringe 4 to 5 per mile	- Meets standard
Dependability	-90% On time performance (0 to 7 minutes late) - No trips leaving early	Several routes do not meet standard
Road call ratio	- 4,000 to 6,000 miles per road call	- 4,336 miles per road call. Meets standard
Safety/Security	<i>A bus stop should be a safe & inviting place for customers</i>	43 police calls to Gold's bus stop
<i>Fiscal Condition</i>		
Fare structure	- Should be simple, convenient for user	- Meets standard
Farebox Recovery	- Significantly alter routes less than 60% of average (22.7% is average) - Review and modify routes between 60% and 80% average	<u>Below 60%</u> All routes except #22, #23, #24 & #25 <u>Between 60% and 80%</u> None
Productivity (Pass/Mile)	- Significantly alter routes less than 60% of average (1.51 pass/mile is average) - Review and modify routes between 60% and 80% of average	<u>Below 60%</u> None <u>Between 60% and 80%</u> 41/40, 42/43, 45/46, 47/48, 53 & 54
<i>Passenger Comfort</i>		
Waiting shelters	- 25 or more boardings	-Evaluated annually and shelters provided within funding parameters
Bus Stop Signs	- Denote StarTran, contact info, and route #	Information included on signs

* 25 foot vehicles cannot accommodate standees

4. Major Service Change Policy

A Major Service Change Policy has been established to ensure compliance with applicable federal requirements (Title VI of the Civil Rights Act of 1964, 49 CFR Section 21 and FTA Circular 4702.1B).

FTA requires that recipients of FTA funding prepare and submit service equity analyses for proposed major service changes. The purpose of this policy is to establish a threshold that defines a major service change and a definition of an adverse effect caused by a major service change.

StarTran Major Service Change Policy:

A major service reduction change is defined as 25% or greater non-seasoned addition or reduction of vehicle revenue hours, miles or passengers on either a route or systemwide basis. The StarTran Advisory Board may, however, conduct a public hearing on a non-major service reduction change if special circumstances are deemed to exist.

All major service changes will be subject to an equity analysis which includes an analysis of adverse effects on minority and low-income populations.

An adverse effect is defined as a geographical or time-based reduction in service, which includes but is not limited to: span of service changes, frequency changes, route segment elimination, re-routing, or route elimination.

5. Disparate Impact Policy

"Disparate impact" refers to a facially neutral policy or practices that disproportionately impacts members of a group identified by race, color, or national origin.

The transit provider shall develop a policy for measuring disparate impacts. The policy shall establish a threshold for determining when adverse effects of service changes are borne disproportionately by minority populations. The disparate impact threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by minority populations compared to impacts borne by non-minority populations.

StarTran Disparate Impact Policy:

In accordance with Federal Transit Administration (FTA) regulations, should the impact of any major service change require a minority population to bear adverse effects greater than 20% than those adverse effects borne by the non-minority population, that impact will be considered disparate impact.

6. Disproportionate Burden Policy

“Disproportionate burden” refers to a neutral policy or practice that disproportionately impacts low-income populations compared to non-low-income populations.

The transit provider shall develop a policy for measuring disproportionate burdens on low-income populations. The policy shall establish a threshold for determining when adverse effects of service changes are borne disproportionately by low-income populations. The disproportionate burden threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by low-income populations as compared to impacts borne by non-low-income populations. The disproportionate burden threshold must be applied uniformly, regardless of mode.

StarTran Disproportionate Burden Policy

In accordance with FTA regulations, should the impact of any major service change require low-income populations to bear adverse effects greater than 20% than those adverse effects borne by the rest of the population, that impact will be considered disproportionate burden.

7. Approval of Major Service Change Policy and Disparate Impact Policy, Disproportionate Burden Policy.

The above policies have been approved by the StarTran Advisory Board, however, this board is not responsible for policy decisions for StarTran. The City of Lincoln Mayor is responsible for policy decisions regarding StarTran. These policies will be formally approved by City of Lincoln Mayor through an Executive Order.

Public Input on Title VI Policies:

Public input was taken at the StarTran Advisory Board meeting on May 26, 2016. After public input the Star Tran Advisory Board recommended approval of the policies.

Public notification of the meeting included an advertisement in the Lincoln Journal Star newspaper, posting on the StarTran website and email notification to the New Americans Task Force.

8. Requirement to Evaluate Service and Fare Changes

Attachment H are the results of Title VI Equity analysis. Included in this analysis is the City of Lincoln Mayor approving the Title VI policies.

9. Requirement to Monitor Transit Service

The table on the following page is a comparison of minority and non-minority area routes using criteria such as service span, headways, weekend service availability, stop amenities and number of trips that exceed load factor.

Monitor Transit Service relative to system wide service standards

Route	Estimated Population within 1/4 mile		Minority Percent	Weekday Span		Weekday Headways			Saturday Span		Saturday Headways			Amenities			Total Wkday Trips	Total Sat Trips	Load - Total trips that exceed load factor	
	Total	Minority		Start	End	AM	Day	PM	Evening	Start	End	AM	Day	PM	Total	Bench	Shelter	Trips	Trips	Weekday
22	6260	1903	30.40%	7:00a	6:00p	7	7	7						4	2	2	77	11	0	0
23	9604	2002	20.85%	7:00a	6:00p	20	20	20						5	3	2	77	0	0	0
24	18372	4462	24.29%	6:50a	9:00p	10	10	10	20					7	3	4	76	4	7	0
25	15983	3649	22.83%	6:55a	9:00p	10	10	10						7	3	4	76	4	4	0
40	35468	5008	14.11%	5:50a	7:20p	30	60	30		7:00a	5:35p	60	60	5	3	2	20	11	0	0
41	22580	3984	17.64%	5:15a	6:45p	30	60	30		6:30a	6:55p	60	60	10	5	5	21	0	0	0
42	26531	5026	18.94%	6:15a	6:45p	30	60	30		7:00a	6:00p	60	60	7	4	3	20	12	0	0
43	25273	3494	13.83%	6:15a	6:45p	30	60	30		6:30a	6:25p	60	60	8	5	3	20	12	0	0
44	25220	3883	15.40%	6:10a	7:05p	30	60	30		7:00a	6:00p	60	60	8	4	3	18	12	0	0
45	22289	3959	17.76%	6:10a	6:40p	30	60	30		6:00p	6:00p	60	60	3	4	3	21	12	0	0
46	11527	2168	18.81%	5:40a	7:10p	30	60	30		7:00a	6:30p	60	60	7	4	3	21	12	0	0
47	20897	3691	17.83%	5:45a	6:45p	30	60	30		6:00p	6:00p	60	60	7	4	3	20	12	0	0
48	21064	4323	20.52%	6:15a	6:45p	30	60	30						6	3	3	19	0	0	0
49	26531	5026	18.94%	6:15a	6:45p	30	60	30		7:00a	6:00p	60	60	8	5	3	20	12	0	0
50	30285	5136	16.96%	6:15a	6:45p	30	60	30		7:00a	6:00p	60	60	10	5	5	20	12	0	0
51	18005	4202	23.34%	5:45a	6:15p	60	120	60		7:00a	5:30p	120	120	7	5	2	9	6	0	0
52	17812	2967	16.66%	5:45a	6:40p	60	120	60		7:30a	6:00p	120	120	6	4	2	10	6	0	0
53	36058	6133	14.24%	6:05a	6:45p	30	60	30						9	5	4	18	6	0	0
54	25332	3472	13.71%	6:40a	6:45p	30	60	30		7:00a	6:00p	60	60	7	4	3	16	12	0	0
55	7634	1575	20.63%	6:15a	6:44p	15	15	15						6	3	3	31	0	0	0

Data Legend

Minority Routes

Using 2010 Census Data, estimates of total and minority population for each block group within 1/4 mile of the route are summarized. Any route with an estimated minority population exceeding their average for their entire service area (14.1%) is classified as a minority route.

Non-Minority Routes

Less than system average

Minority Routes

More than system average

More than double system average

Span and Headway

Trip start and end times for weekdays and Saturdays show service span for routes

Headways show time in minutes between buses, listed for AM, Day, PM and Evening

Stop Amenities

The total number of benches or shelters for each route is listed, followed by subtotal for benches and shelters

Loading

Loading refers to the number of passengers carried on a segment of a route. Passengers should be seated except for short periods of time associated with peak load periods. 25% standees for short periods are acceptable. Routes 41, 46 and 54 also experience standees on select trips but meet standard.

DEFINITIONS

Provided are the definitions from FTA C4702.1B that are referenced in this report.

- a. Applicant means a person or entity that submits an application, request, or plan required to be approved by the FTA Administrator or by a primary recipient, as a condition of eligibility for financial assistance from FTA, and “application” means such an application, request, or plan.
- b. Demand response system: Any non-fixed route system of transporting individuals that requires advanced scheduling including services provided by public entities, non-profits, and private providers. An advance request for service is a key characteristic of demand response service.
- c. Designated recipient means an entity designated, in accordance with the planning process under sections 5303 and 5304, by the Governor of a State, responsible local officials, and publicly owned operators of public transportation, to receive and apportion amounts under section 5336 to urbanized areas of 200,000 or more in population; or a State or regional authority, if the authority is responsible under the laws of a State for a capital project and for financing and directly providing public transportation.
- d. Direct recipient means an entity that receives funding directly from FTA. For purposes of this Circular, a direct recipient is distinguished from a primary recipient in that a direct recipient does not extend financial assistance to subrecipients, whereas a primary recipient does.
- e. Discrimination refers to any action or inaction, whether intentional or unintentional, in any program or activity of a Federal aid recipient, subrecipient, or contractor that results in disparate treatment, disparate impact, or perpetuating the effects of prior discrimination based on race, color, or national origin.
- f. Disparate impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient’s policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.
- g. Disproportionate burden refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.
- h. Disparate treatment refers to actions that result in circumstances where similarly situated persons are intentionally treated differently (i.e., less favorably) than others because of their race, color, or national origin.
- i. Fixed guideway means a public transportation facility—using and occupying a separate right-of-way for the exclusive use of public transportation; using rail; using a fixed catenary system; for a passenger ferry system; or for a bus rapid transit system.
- j. Fixed route refers to public transportation service provided in vehicles operated along pre-determined routes according to a fixed schedule.

k. Federal financial assistance refers to

- (1) grants and loans of Federal funds;
- (2) the grant or donation of Federal property and interests in property;
- (3) the detail of Federal personnel;
- (4) the sale and lease of, and the permission to use (on other than a casual or transient basis), Federal property or any interest in such property without consideration or at a nominal consideration, or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale or lease to the recipient; and
- (5) any Federal agreement, arrangement, or other contract that has as one of its purposes the provision of assistance.

l. Limited English Proficient (LEP) persons refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

m. Low-income person means a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines. Recipients are encouraged to use a locally developed threshold, such as the definition found in 49 U.S.C. 5302 as amended by MAP-21: "refers to an individual whose family income is at or below 150 percent of the poverty line (as that term is defined in Section 673(2) of the Community Services Block Grant Act (42 U.S.C 9902(2)), including any revision required by that section) for a family of the size involved" or another threshold, provided that the threshold is at least as inclusive as the HHS poverty guidelines.

n. Low-income population refers to any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FTA program, policy or activity.

o. Metropolitan planning organization (MPO) means the policy board of an organization created and designated to carry out the metropolitan transportation planning process.

p. Metropolitan transportation plan (MTP) means the official multimodal transportation plan addressing no less than a 20-year planning horizon that is developed, adopted, and updated by the MPO through the metropolitan transportation planning process.

q. Minority persons include the following:

- (1) American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
- (2) Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
- (3) Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
- (4) Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- (5) Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

r. Minority population means any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations (such as migrant workers or Native Americans) who will be similarly affected by a proposed DOT program, policy, or activity.

s. Minority transit route means a route that has at least 1/3 of its total revenue mileage in a Census block or block group, or traffic analysis zone(s) with a percentage of minority population that exceeds the percentage of minority population in the transit service area. A recipient may supplement this service area data with route-specific ridership data in cases where ridership does not reflect the characteristics of the census block, block group, or traffic analysis zone.

t. National origin means the particular nation in which a person was born, or where the person's parents or ancestors were born.

u. Noncompliance refers to an FTA determination that the recipient is not in compliance with the DOT Title VI regulations, and has engaged in activities that have had the purpose or effect of denying persons the benefits of, excluding from participation in, or subjecting persons to discrimination in the recipient's program or activity on the basis of race, color, or national origin.

v. Non-profit organization: A corporation or association determined by the Secretary of the Treasury to be an organization described by 26 U.S.C. 501(c) which is exempt from taxation under 26 U.S.C. 501(a) or one which has been determined under State law to be non-profit and for which the designated State agency has received documentation certifying the status of the non-profit organization.

w. Predominantly minority area means a geographic area, such as a neighborhood, Census tract, block or block group, or traffic analysis zone, where the proportion of minority persons residing in that area exceeds the average proportion of minority persons in the recipient's service area.

x. Primary recipient means any FTA recipient that extends Federal financial assistance to a subrecipient.

y. Provider of fixed route public transportation (or "transit provider") means any entity that operates public transportation service, and includes States, local and regional entities, and public and private entities. This term is used in place of "recipient" in chapter IV and is inclusive of direct recipients, primary recipients, designated recipients, and subrecipients that provide fixed route public transportation service.

z. Public transportation means regular, continuing shared-ride surface transportation services that are open to the general public or open to a segment of the general public defined by age, disability, or low income; and does not include Amtrak, intercity bus service, charter bus service, school bus service, sightseeing service, courtesy shuttle service for patrons of one or more specific establishments, or intra-terminal or intrafacility shuttle services. Public transportation includes buses, subways, light rail, commuter rail, monorail, passenger ferry boats, trolleys, inclined railways, people movers, and vans. Public transportation can be either fixed route or demand response service.

aa. Recipient as used in this Circular, means any public or private entity that receives Federal financial assistance from FTA, whether directly from FTA or indirectly through a primary recipient. This term includes subrecipients, direct recipients, designated

recipients, and primary recipients. The term does not include any ultimate beneficiary under any such assistance program.

bb. Secretary means the Secretary of the U.S. Department of Transportation.

cc. Service area refers either to the geographic area in which a transit agency is authorized by its charter to provide service to the public, or to the planning area of a State Department of Transportation or Metropolitan Planning Organization.

dd. Service standard/policy means an established service performance measure or policy used by a transit provider or other recipient as a means to plan or distribute services and benefits within its service area.

ee. Statewide transportation improvement program (STIP) means a statewide prioritized listing/program of transportation projects covering a period of four years that is consistent with the long-range statewide transportation plan, metropolitan transportation plans, and TIPs, and required for projects to be eligible for funding under title 23 U.S.C. and title 49 U.S.C. Chapter 53.

ff. Subrecipient means an entity that receives Federal financial assistance from FTA through a primary recipient.

gg. Title VI Program refers to a document developed by an FTA recipient to demonstrate how the recipient is complying with Title VI requirements. Direct and primary recipients must submit their Title VI Programs to FTA every three years. The Title VI Program must be approved by the recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA. For State DOTs, the appropriate governing entity is the State's Secretary of Transportation or equivalent.

hh. Transportation improvement program (TIP) means a prioritized listing/program of transportation projects covering a period of four years that is developed and formally adopted by an MPO as part of the metropolitan transportation planning process, consistent with the metropolitan transportation plan, and required for projects to be eligible for funding under title 23 U.S.C. and title 49 U.S.C. Chapter 53.

ii. Transportation management area (TMA) means an urbanized area with a population over 200,000, as defined by the Bureau of the Census and designated by the Secretary of Transportation, or any additional area where TMA designation is requested by the Governor and the MPO and designated by the Secretary of Transportation.

City of Lincoln - StarTran 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. 42 U.S.C. § 2000d

If you believe you or others protected by Title VI have been discriminated against, you may file a complaint with the City's Ombudsman at the Mayor's office:

Ombudsman, Office of the Mayor, 555 South 10th Street, Suite 301, Lincoln, NE 68508
Phone: 402-441-7511

A complaint form can be found at: <http://lincoln.ne.gov/city/mayor/pdf/TitleVIActionCenter.pdf>

A complainant may also 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, 5th Floor – TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

If information is needed in another language, please contact 402-441-7185.

Si necesita informacion en otro lenguaje, por favor hablar al numero 402-441-7185.

Nếu quý vị cần thông tin trong ngôn ngữ khác, xin hãy liên lạc 402-441-7185.

انصل ، أخرى لغة في المعلومات حاجة هناك كانت إذا (٢,٤) ٠٨١٧-١٤٤

TITLE VI COMPLAINT FORM

Return completed form to:
Ombudsman, Office of the Mayor
555 South 10th Street, Suite 301
Lincoln, NE 68508

You are not required to use this form; a letter with the same information is sufficient. However, the information requested in the items marked with a star (*) must be provided, whether or not the form is used. The complaint should be submitted as soon as possible but no later than 180 calendar days after the date the alleged discrimination occurred.

1. * State your name and address.

Name: _____
Address: _____
_____ zip _____
Telephone No: _____

2. * If you are filing on behalf of another person, include their name and address:

Name: _____
Address: _____
_____ zip _____
Telephone No: _____

Please explain your relationship to this person (e.g. friend, attorney, parent, etc).

3. * Please describe how, why, and when you believe you were discriminated against. Include as much background information as possible about the alleged act(s) of discrimination. Include names of individuals whom you allege discriminated against you, if you know them.

4. Please list any persons, if known, whom we may contact for additional information to support or clarify your complaint.

Name, address, and telephone numbers:

5. Do you have any other information that you think is relevant to our investigation of your allegations? Please use additional sheets if necessary or attach a copy of written materials.

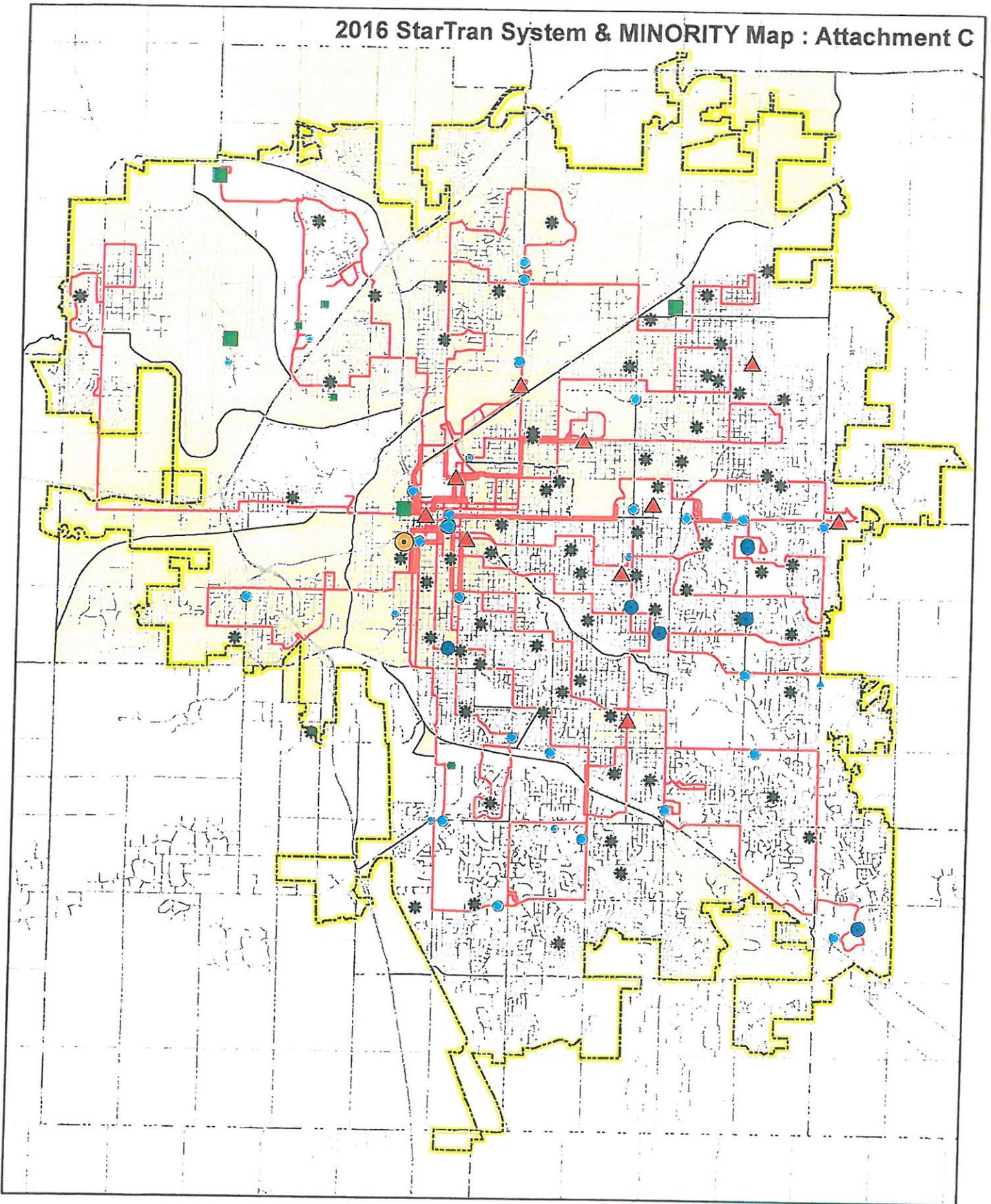
6. What resolution are you seeking for this particular situation?

7. * We cannot accept a complaint if it has not been signed. Please sign and date this complaint below.

(Signature)

(Date)

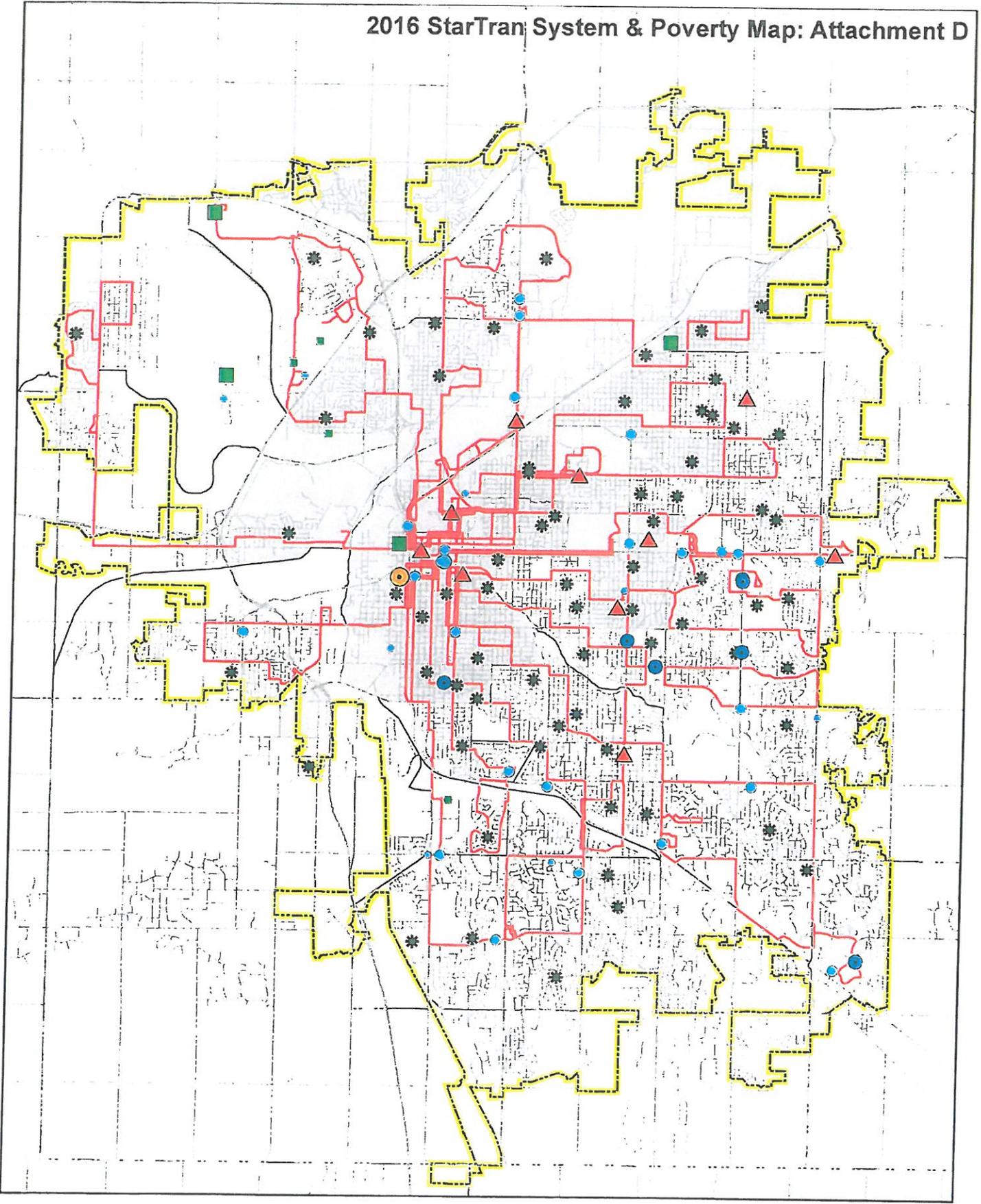
2016 StarTran System & MINORITY Map : Attachment C



- | | | | | | |
|--|------------------------------|--|--------------------------------|--|------------------------------------|
| | Regional Commerce Center | | StarTran Administration/Garage | | City Limit |
| | Community Commerce Center | | Higher Education | | StarTran Routes |
| | Neighborhood Commerce Center | | Hospitals | | Minority Percentage |
| | Moderate to Heavy Industrial | | Primary Education | | 0% - 14.1% |
| | Light Industrial | | | | % Minority > City Average of 14.1% |

CITY OF LINCOLN
NEBRASKA

2016 StarTran System & Poverty Map: Attachment D



- | | | |
|------------------------------|--------------------------------|--------------------------------|
| Regional Commerce Center | StarTran Administration/Garage | City Limit |
| Community Commerce Center | Higher Education | StarTran Routes |
| Neighborhood Commerce Center | Hospitals | Poverty Rate |
| Moderate to Heavy Industrial | Primary Education | 0% - 16.2 % |
| Light Industrial | | % Poverty > City Average 16.2% |

CITY OF LINCOLN
NEBRASKA

INTEROFFICE MEMORANDUM

Attachment F

TO: Thomas Schaefer – PW/U
FROM: Mike Davis – StarTran 
DATE: March 7, 2016
SUBJECT: Review of Transit Performance Standards & Service Goals
CC: Mike DeKalb – StarTran Advisory Board, Brian Praeuner – StarTran

Per Section 2.38.090 of the Lincoln Municipal Code (LMC) which states “the StarTran Advisory Board shall annually review an evaluation of the transit performance standards and service goals described in the current ‘Transit Development Plan’ (TDP). Upon completion of each annual review, the advisory board shall forward its recommendation, if any, to the Director of Public Works and Utilities, who shall forward the recommendations to the Mayor and City Council as appropriate.” The preparation of these performance standards and service goals are also in response to Federal Transit Administration requirements set forth in Circular C4702.1B.

The StarTran Advisory Board on January 28, 2016, reviewed and approved the FY 2014 - 2015 Draft Transit Surveillance Report (attached) addressing the level of attainment of the 19 StarTran Service Standards and Performance Measures. It was noted by StarTran staff that these performance standards were developed as part of the 2007 Transit Development Plan and all the standards will be revised as part of the 2015 Transit Development Plan.

Please review this information and forward to the Mayor and City Council.

As identified in the FY 2014 - 2015 Draft Transit Surveillance Report, 13 standards are being met and six standards are not met. The following are the six unmet standards, and the strategies for addressing each...

1. Standard: Service Coverage

Category: Frequency

Standard is 30 minutes during weekday peak periods, and 60 minute during off-peak periods and Saturdays.

Service Strategy: The headways for the Weekday and Saturday 51/52 West A/Gaslight are proposed to operate more frequently as part of the Transit Development Plan recommendations.

2. Standard: Service Coverage

Category: Span

Standard for StarTran regular route service should be 5:00 AM to 10:00 PM on weekdays.

Comment: None of the weekday routes operate until 10:00 PM. The #24 Holdrege and #25 Vine route operate till 9:00 pm. As part of the TDP recommendations there are 8 bus routes proposed to operate longer in the evening.

Service Strategy: None

3. Standard: Patron Convenience

Category: Speed

Comments: Routes, 40 and 46 slightly exceeded the standard. The average speed of individual routes is very much a function of the type of roadways and stop spacings of the route.

Service Strategy: The routes identified above that exceed the standard have been analyzed for improvement and it was determined that no changes should be made to these routes. This analysis is based on complaints and vehicle accidents for these routes.

4. Standard: Patron Convenience

Category: Dependability

Comments: *Several routes do not meet the standard.*

Service strategies:

Designated bus stop changes will improve on-time performance.

For many time points there is inadequate layover time in the schedule so adjustments will be made to routes to account for adequate layover time.

Transfer waiting times can be long therefore impacting routes being on-time. Transfer waiting time policy will be reviewed as part of the 2015 Transit Development Plan

Revise policy for changing routes and schedules. Typically changes are "accumulated" throughout the year and made together to prevent re-printing of route maps/schedule brochures.

5. Standard: Fiscal Condition

Category: Farebox Recovery

Comments: All routes are less than 60% of the system except #22, #23, #24 and #25.

The 55 Star Shuttle route would be expected to have lower farebox recovery due to the lower fare on that route.

Service Strategy: The system average for FY 2014-15 is higher (22.7%) compared to last year (21.9%). There were some increases and decreases in recovery compared to this year and last year. The overall increase in farebox recovery is due to gains in the two university routes. It is recommended that no service strategies be implemented, but will continue to monitor.

6. Standard: Fiscal Condition

Category: Productivity

Category: Productivity

Comments: There were no routes less than 60% of the system average.

Several routes are between 60% and 80% of the system average.

Service Strategy: StarTran routes are proposed to be realigned in order to maximize productivity as part of the Transit Development Plan.