

Title VI Program 2024 Update



Niagara Frontier Transportation Authority
181 Ellicott St.
Buffalo, NY 14203

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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 Administration'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 2024 report adheres to the prescriptive Federal processes and requirements for the development of a Title VI program.

As the following 2024 Title VI Program shows, the NFTA has a fair distribution of transit services for the populations in its service area. NFTA service coverage includes Census Block Groups 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 2024 Title VI Submission Changes

The following is an outline of the full Title VI program and a summary of changes since the 2021 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 or forms.

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 – NFTA's Public Participation Plan was updated since the last submission. The new Public Participation Plan, which is expanded in scope and content compared to the 2015 plan, is included in full in this chapter. This chapter also summarizes community engagement activities and public hearings held since 2021 and provides a comprehensive list of these activities.

Chapter 5: Meaningful Access to LEP Persons - Of the languages spoken at home 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 have been routine changes to CAC member organizations since the last submission. Minority representation by members is 48%.

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

Chapter 8: Determination of Site of Location of Facilities – NFTA has not sited any new facilities since 2021.

Chapter 9: System-wide Service Standards and Policies – NFTA's service standards have been updated since the last submission. The new standards were approved by the NFTA Board of Commissioners in March 2021. The new service standards are included in this document in full.

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 Service and Fare Analysis for the 2021 Proposed Bus Network Improvements and Fare Changes, which included three public hearings. Mitigating factors minimize the impacts of the two major service changes that would cross the threshold for a disparate impact, and the one service change that would cross the threshold for a disproportionate burden.

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 sub-recipients all have their notice posted as well.

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 documents, program brochures and program intake documents.

- Go Buffalo Mom (a program associated with the United Way)

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 5th Floor-TCR 1200 New Jersey Ave, SE Washington, DC 20590

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.

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.



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 nfta.com.</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 nfta.com.</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/about/public-information). 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 Chief Diversity Officer or designated representative.

However, to ensure 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 Chief Diversity Officer 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 Chief Diversity Officer 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 Chief Diversity Officer or designated representative in an effort to resolve the matter informally.

The Chief Diversity Officer 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 Manager 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 Chief Diversity Officer and these will be investigated by same.
7. The Chief Diversity Officer will have access to all records, documents, memoranda, etc. necessary to conduct a review of the complaint.
8. The Chief Diversity Officer 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.

Assure the "Complaint Procedures" are posted on all employee bulletin boards, together with information as to where and with whom complainants.



Kimberley A. Mynkel
Executive Director
9-27-22
Date



Michael F. Hughes
Chair
11/1/22
Date

Figure 5 – Civil Rights Complaint Procedure in Spanish

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 completas.

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 ocurrirá. 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 6 - Title VI 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. _____ _____ _____ _____	
Section IV	
Have you previously filed a Title VI complaint with this agency? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Section V	
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

Signature

Date

If you have any questions or need assistance completing this form, please contact EEO/Diversity Development office at (716) 855-7489.

The completed form must be returned to:
Dejuan Hardy, 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? Sí* _____ 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. Si: _____ No: _____

Seccion III

¿Fue discriminado por (marque todo lo que corresponda)

Raza Color 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? Sí: _____ No: _____

Seccion V

¿Ha presentado esta queja ante cualquier otra agencia federal, estatal o local? o con cualquier o tribunal federal o estatal? Yes No

En caso afirmativo, marque todo lo que corresponda:

Agencia federal Tribunal federal Agencia estatal Tribunal estatal 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:
DeJuan Hardy, 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 seven complaints, two lawsuits, and no investigations since the last submission.

Figure 7- Summary of Lawsuits and Complaints

Investigations, Lawsuits and Complaints				
Investigations:	Date	Summary	Status	Action Taken
None	None	None	None	None
Lawsuits:	Date	Summary	Status	Action Taken
Race	2/24/21 at EEOC, 10/28/21 in WDNY	Alleges discrimination based on disparaging statement made by supervisor about George Floyd.	Summary judgment granted but overturned on appeal awaiting determination on a motion to dismiss, EEOC/WDNY.	Supervisor Counseled.
Race	10/11/23	Terminated employee challenged termination at arbitration and lost. Subsequently filed discrimination charge in Federal Court.	Case pending motion to dismiss, EEOC/WDNY.	Case pending motion to dismiss.
Complaints:	Date	Summary	Status	Action Taken
Race	4/16/24	Terminated for engaging in an altercation with a passenger and subsequently reinstated by an arbitrator. Was terminated again for falsifying documents. She brought a charge at the NYSDHR alleging discrimination based on race (and other protected categories). Answer filed.	Pending probable cause review, NYSDHR.	Terminated for falsifying documents.

All Categories	3/8/24, 4/22/24, 7/8/24	Filed three charges with the NYSDHR. In each charge he has "checked the box" for every type of discrimination covered by New York State Human Rights Law. All three actions are without merit and are not truly discrimination charges. Charge 1 is a personal injury charge without an injury. Charge 2 is a duplicate of charge 1. Charge 3 alleges a non-exist vehicle accident. Answers filed	All cases pending probable cause review at NYSDHR.	Answers filed, all cases pending probable cause review at NYSDHR.
All Categories	1/5/22	The substantive allegations related to a slip and fall dispute - It is not really a discrimination claim but it was filed as one.	Dismissed, No Probable Cause, NYSDHR.	Dismissed.
Race	5/23/23	Alleging disparate treatment based on failure to promote. Answer filed.	Pending determination at EEOC.	Pending determination at EEOC.
Race	8/8/22, 8/24/23, 4/19/24	White employee alleging inferior working conditions compared to non-white coworkers. Multiple charges filed, charges 2 & 3 similar and or duplicative.	Charge 1 withdrawn from the NYSDHR to pursue rights in federal court, however no further actions have been taken. Charges 2 and 3 pending probable cause review.	Charge 1 withdrawn from the NYSDHR to pursue rights in federal court, however no further actions have been taken. Charges 2 and 3 pending probable cause review.
Race	7/1/24	African American employee alleging inferior working conditions compared to white co-workers. Investigated and deemed to be without merit. Answer filed	Answer filed, pending probable cause review, NYSDHR.	Investigated and deemed to be without merit.
Race	7/24/23	Alleged discriminatory comments made by co-worker based on race. Co-worker resigned in lieu of termination.	Case still pending probable cause review, NYSDHR.	Case still pending probable cause review, NYSDHR.

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.

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:

NFTA is committed to seeking community input early and often. The agency has a long-standing history of engaging with individuals, community groups, grassroots organizations, and minority and LEP populations, and NFTA continues to make this a priority.

The key tool NFTA uses to guide community input efforts is the Public Participation Plan, which was updated in late 2018. This plan highlights best practices and strategies to use in engaging our riders and specifically our minority and LEP passengers.

As described in the Public Participation Plan at the end of this chapter, the following are some of the key tools that NFTA has used in the past three years to engage with riders and the public with a focus on minority and LEP populations:

1. Citizen's Advisory Committee (CAC) - In 2012, NFTA established a Citizens Advisory Committee (CAC) of 25 individuals that meet bi-monthly. Input is solicited from the CAC members on many NFTA projects and initiatives. The CAC consists of transit riders and individuals representing minority and LEP groups and other groups with high transit usage, such as the NAACP, Niagara Falls Housing Authority, Buffalo Urban League, Community Action Organization, Journey's End Refugee Services, and more. As of August 2024, 48% of CAC members are people of color.
2. Rider Alerts - NFTA develops rider alerts that contain pertinent information that are placed in all buses and rail cars, transit centers, rail stations, and are distributed directly to LEP and EJ organizations.
3. Partner events – NFTA regularly attends partner events such as meetings and festivals in order to seek input from minority and LEP populations where they are already gathered. For example, NFTA has tabled at the Juneteenth Festival, Taste of Diversity (a food-oriented festival on the diverse West Side of Buffalo), Niagara Falls Housing Authority festival(s), Northland Workforce Training Center, and more. A full list of events is provided in the chart below.
4. On-vehicle surveys – NFTA regularly conducts one on one conversations (mini surveys or interviews) with riders on buses to better understand their needs and opinions about specific bus routes. In 2021-2024, NFTA spoke directly to about 1,400 riders as part of these onboard interviews.
5. Open houses and public workshops – NFTA holds open houses and public workshops in the event of major planning efforts and/or service changes. 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.

6. Public hearings - In the event of a major service change or fare change, the NFTA will hold one or more public hearings. The NFTA also encourages submission of written comments by letter, e-mail or notification in established print media and community newspapers.

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 September 27, 2018 by the Board of Commissioners (see p. 49 of this document).

NFTA works to accommodate service requests received from the community and regularly monitors service performance by collecting objective information on route ridership and productivity. Since the most 2021 Title VI report, NFTA implemented the (as of made permanent services changes that were described in that report; those changes were approved by the NFTA Board of Commissioners around the same time that the 2021 report were submitted. Please see chapter 12 for further discussion of these changes.

The following is a list of the major service and fare changes public meetings NFTA conducted since the last Title VI submission. Public meetings are more informal, with a presentation followed by a question and answer and comment session, while public hearings follow the formal procedures outlined by the Policy for Soliciting of Public Comment as mentioned above.

NFTA Metro Rail / Metro Transit Expansion Meetings

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. In January 2020, NFTA released a Draft Environmental Impact Analysis pursuant to the requirements of New York State Environmental Quality Review Act (SEQRA). NFTA developed and implemented a robust Public Involvement Plan (PIP) that went above and beyond the required scoping meetings and public hearings and included a technical advisory committee, internal steering committee, stakeholder committee, University at Buffalo Working Group, agency coordination plan, and many public meetings and pop-up events.

In October 2020, FTA accepted the role of lead agency for the Metro Rail Expansion environmental review process. In August 2021, NFTA and FTA stated their intent to prepare an EIS on both light rail transit and bus rapid transit, issued a Notice of Intent, and began the formal scoping process.

Below is a list of the key events:

- September 15, 2021, at 1pm and 6:30 pm – Scoping meetings (virtual)
- Three drop-in listening sessions held during the DEIS process:
 - Thursday, January 25, 2024 at US itek, 1060 Niagara Falls Blvd, Tonawanda NY
 - Monday, January 29, 2024 at Amherst Main Library, 350 John James Audubon Pkwy, Amherst NY
 - Tuesday, January 30, 2024 at Kenilworth Library, 318 Montrose Ave, Buffalo NY

A project website, surveys, media releases, and outreach to partners were used to spread the word about public comment opportunities. Environmental justice communities in the corridor were targeted through partner organizations such as El Museo, a nonprofit that does cultural and visual arts programming that engages diverse communities, and Heart of the City, a housing organization, as well as through partners on the Citizens Advisory Committee.

NFTA Metro Paratransit Study Public Meetings

In April 2021, NFTA Metro began its Paratransit Comprehensive Analysis and Service Expansion Evaluation Study, with the aim of evaluating opportunities and impacts of expanding the PAL service area beyond the ADA required ¾ mile fixed route service envelope; identifying enhancements to existing service to better serve the disabled community; increasing the operational efficiency of the PAL system, fleet, and operations; and enhance the overall customer experience. The study is currently underway, led by a consultant team headed by Nelson\Nygaard Consulting Associates.

As part of the Engagement portion of the study, a public meeting was held in two sessions: a virtual session, held via Zoom on December 13, 2023 from 1:00 PM to 2:30 PM; and an in-person session, held at the Schiller Park Senior Center (2057 Genesee St, Buffalo, NY 14211) on December 14, 2023 from 6:00 to 7:30 PM.

The December 2023 public meeting sessions outlined the progression of the study to date; and targeted engagement with PAL riders and community advocates based around two discussion topics:

- PAL Service today, including challenges using the existing service and ideas and suggestions for improving paratransit service
- Potential future service expansion, including areas and timespans that are currently not served or underserved by PAL

A project website, media releases, engagement with partners and participants on the Accessibility Advisory Committee (AAC), and outreach to key stakeholders and partners was used to spread the word about public engagement events.

Other Outreach Efforts:

NFTA has several 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 Outreach

Metro Bus and Rail has developed a new fare collection system. The new system, known as MetGo, uses advanced technology to make accessing public transit faster, easier to use and more flexible. Old fare boxes and ticket vending machines have been replaced, new fare gates have been installed within underground rail stations, and riders can now use the MetGo smart card to access the transit network.

The upgrade was implemented in November 2023 and introduced several changes to the fare structure: 31-day fare capping, elimination of enhanced express surcharge, elimination of paper day passes from being sold on Metro Bus vehicles, and approval of premium fares where applicable. A Fare Equity Analysis has been conducted on these changes which is included as part of Chapter 12.

Tabling sessions and other outreach was conducted during the week of 10/30 to 11/3, 2023 to solicit input from riders and assist them in understanding the new system, navigating the new fare gates, and understanding how to load and use the MetGo smart cards. NFTA Transit Ambassadors and other Metro staff were stationed at each underground Metro Rail station in three-hour shifts.

Route Reviews

Approximately every 2 months NFTA staff and management (including bus drivers, data team, Director of Public Transit, service planning staff, scheduling staff, garage managers, and more) gather to study one bus route in depth. As part of this initiative, service planning staff ride the buses to conduct mini surveys/interviews of riders to better understand the needs and issues from a rider perspective. Since 2021, NFTA has conducted route reviews on 14 routes, and approximately 100-150 riders were surveyed per route.

Figure 8: Complete list of outreach and engagement activities, September 1, 2021 – August 15, 2024

Date	Location	Event Name	Type(s) of outreach	Summary of activities
9/15/21	Online/Virtual	Buffalo-Amherst-Tonawanda Transit Expansion Project Scoping Meeting	Formal scoping meeting (public hearing) for Environmental Impact Statement	NFTA solicited input on topics that should be studied in-depth as part of the Environmental Impact Statement for the Metro Rail Expansion (LRT, BRT). Attendees provided statements at the hearing, as well as through email and letter through October 14.
11/16/2021	3rd & Old Falls, Niagara Falls, 3 hours	Niagara Falls Bus Network Changes Outreach	tabling at transit centers and key bus stops	In the weeks leading up to the December 5th major schedule change, and in the days after December 5th, NFTA staff did outreach and education in key locations and onboard buses
11/18/2021	PRTC, 3 hours	Niagara Falls Bus Network Changes Outreach	tabling at transit centers and key bus stops	In the weeks leading up to the December 5th major schedule change, and in the days after December 5th, NFTA staff did outreach and education in key locations and onboard buses
11/22/2021	Onboard 52, 55, 3 hours	Niagara Falls Bus Network Changes Outreach	onboard outreach	In the weeks leading up to the December 5th major schedule change, and in the days after December 5th, NFTA staff did outreach and education in key locations and onboard buses
11/22/2021	Onboard 55F (6 trips)	Niagara Falls Bus Network Changes Outreach	onboard outreach	In the weeks leading up to the December 5th major schedule change, and in the days after December 5th, NFTA staff did outreach and education in key locations and onboard buses

11/23/2021	NFTC, 3 hours	Niagara Falls Bus Network Changes Outreach	tabling at transit centers and key bus stops	In the weeks leading up to the December 5th major schedule change, and in the days after December 5th, NFTA staff did outreach and education in key locations and onboard buses
11/30/2021	PRTC, 3 hours	Niagara Falls Bus Network Changes Outreach	tabling at transit centers and key bus stops	In the weeks leading up to the December 5th major schedule change, and in the days after December 5th, NFTA staff did outreach and education in key locations and onboard buses
12/1/2021	PRTC, 3 hours	Niagara Falls Bus Network Changes Outreach	tabling at transit centers and key bus stops	In the weeks leading up to the December 5th major schedule change, and in the days after December 5th, NFTA staff did outreach and education in key locations and onboard buses
12/2/2021	Onboard 52, 55	Niagara Falls Bus Network Changes Outreach	onboard outreach	In the weeks leading up to the December 5th major schedule change, and in the days after December 5th, NFTA staff did outreach and education in key locations and onboard buses
12/3/2021	PRTC and Wrobel Towers, 3 hours each	Niagara Falls Bus Network Changes Outreach	tabling at transit centers and key bus stops	In the weeks leading up to the December 5th major schedule change, and in the days after December 5th, NFTA staff did outreach and education in key locations and onboard buses
12/5/2021	PRTC and NFTC, all day	Niagara Falls Bus Network Changes Outreach	tabling at transit centers and key bus stops	In the weeks leading up to the December 5th major schedule change, and in the days after December 5th, NFTA staff did outreach and education in key locations and onboard buses
12/6/2021	PRTC and NFTC, all day	Niagara Falls Bus Network Changes Outreach	tabling at transit centers and key bus stops	In the weeks leading up to the December 5th major schedule change, and in the days after December 5th, NFTA staff did outreach and education in key locations and onboard buses
12/7/2021	PRTC and NFTC, all day	Niagara Falls Bus Network Changes Outreach	tabling at transit centers and key bus stops	In the weeks leading up to the December 5th major schedule change, and in the days after December 5th, NFTA staff did outreach and education in key locations and onboard buses

12/8/2021	PRTC and NFTC, all day	Niagara Falls Bus Network Changes Outreach	tabling at transit centers and key bus stops	In the weeks leading up to the December 5th major schedule change, and in the days after December 5th, NFTA staff did outreach and education in key locations and onboard buses
4/18 - 4/29/22	Rail and assorted buses	ABBG/GOAL Survey	Postcard distribution and conversations	Customer Care staff and management team volunteers handed out postcards encouraging riders to take the GOAL and ABBG survey. Staff answered rider questions and comments as well.
4/20/2022	UB North Campus	CRT Quarterly Meeting	Project Update Presentation	In-person presentation to CRT members providing an update on the Metro Transit Expansion Project's NEPA review process
4/24 – 5/6/2022	Onboard 35 Sheridan	35 Sheridan Onboard Outreach	Route Review	In preparation for the May 12, 2022 Route Review meeting, Service Planning staff spoke with 94 riders over the course of 6 round trips.
9/12- 9/16/2022	Onboard 14 Abbott	14 Abbott Onboard Outreach	Route Review	In preparation for the September 21, 2022 Route Review meeting, Service Planning staff spoke with 160 riders over the course of 6 round trips.
11/14- 11/18/2022	Onboard 13 Kensington	13 Kensington Onboard Outreach	Route Review	In preparation for the November 30, 2022 Route Review meeting, Service Planning staff spoke with 99 riders (so far)
11/28/2022	Onboard Niagara Falls routes (40, 50, 52, 55, 59, 77)	Bus Network Improvements - Post Implementation Survey	Survey	Service Planning staff collected feedback from riders on Niagara Falls routes via a survey, to determine the impacts that the Bus Network Improvements plan had on rider convenience and satisfaction.
1/19/2023	Onboard 20 Elmwood	20 Elmwood Onboard Outreach	Route Review	In preparation for the Feb 2, 2023 Route Review meeting, Service Planning staff spoke with 100 riders over the course of about 10 round trips on the 20-Elmwood.

2/13/2023	Onboard 46 Lancaster	46 Lancaster Onboard Outreach	Route Review	In preparation for the March 9, 2023 Route Review meeting, Service Planning staff spoke with 100+ riders.
2/20/2023	Onboard 76 Lakeshore Exp	76 Lakeshore Onboard Outreach	Route Review	In preparation for the March 9, 2023 Route Review meeting, Service Planning staff spoke with 17 riders.
3/27/2023	Online/Virtual	ABBG Customer Satisfaction Survey	Survey	This is an annual survey given to riders to inform staff on how to make improvements to the bus and rail system.
4/17/2023	Onboard 48 Williamsville	48 Williamsville Onboard Outreach	Route Review	In preparation for the May 9, 2023 Route Review meeting, Service Planning staff spoke with 67 riders.
6/5/2023	Elmwood Ave	Pride Parade	Parade	The NFTA-Metro Pride Team marched in the Buffalo Pride Parade with Metro t-shirts and a wrapped bus.
6/13/2023	University District	University United Festival	Tabling	Customer care provided information on MetGo and PAL, summer schedules changes, construction at University station and job opportunities.
6/19/2023	Martin Luther King Jr. Park	Juneteenth	Parade & Tabling	NFTA-Metro celebrated Juneteenth by marching with the Black History Bus and talking to festival goers about their metro experience.
6/29/2023	Sahlen Field	Family and Friends Night at the Bisons' Game	Tabling	Staff members talked to baseball fans about the Parks Adventure Bus, MetGo, and job opportunities.

6/1-9/1/2023	Online/Virtual	Parks Adventure Bus Survey	Survey	This is a seasonal survey given to Parks Adventure Bus riders to gain insight on who is riding and how to improve the program over the next year.
6/1-9/1/2023	City of Buffalo	Clean Sweep	Clean-Up/ Outreach	Public Affairs staff has been participating in the City of Buffalo's Clean Sweep events and speaking to about 200 people per week about NFTA.
7/8/2023	Downtown Buffalo	Taste of Buffalo	Tabling	Staff members engaged festival goers with a prize wheel and discussions around MetGo and NFTA job opportunities.
8/3/2023	NF Convention Center	Developmental Disabilities Awareness Day	Tabling	The NFTA participated in the 35th Annual Developmental Disabilities Awareness Day and helped bridge relationships between NFTA staff and the community
8/19/2023	Niagara Square	Puerto Rican and Hispanic Heritage Festival	Parade & Festival	The NFTA Metro team members participated in Buffalo's 21st Puerto Rican Hispanic Parade and Festival. Over 55 people came out to celebrate and learn about metro and Hispanic culture.
8/30/2023	Jefferson Corridor	Clean Mobility and Environmental Justice Tour	Tour	Metro staff and the Clean Mobility Leadership group took an electric bus and discussed clean mobility solutions for the East Side.
9/18-10/19/2023	Metro Garages and Stations	MetGo Inreach	Inreach	Service planning and customer care spoke to operators at Frontier, Cold Spring, and Babcock Station about MetGo. Operators were able to ask questions they were getting from riders and take materials with information.
10/23-11/3/2023	Metro Rail Stations & Transit Hubs	MetGo Outreach	Outreach	Service planning and other departments talked to riders at the rail stations and Black Rock Riverside Transit Hub. Staff answered questions about MetGo, explained fare capping, and gave riders important dates.

10/16-10/26/2023	Onboard the 11 Colvin	11 Colvin Onboard Outreach	Route Review	In preparation for the November 15, 2023, Route Review meeting, Service Planning staff spoke with 178 riders.
11/2-11/16/2023	Buffalo Neighborhoods	Buffalo Common Council Winter Preparedness Series	Learning Series	NFTA and the Buffalo Common Council gave workshops at different neighborhood centers. This included conversations around winter riding tips, MetGo, and jobs. Red light and whistle key chains were also handed out to help riders in the dark.
11/6-11/9/2023	On board the 25 Delaware	25 Delaware Onboard Outreach	Route Review	In preparation for the November 15, 2023, Route Review meeting, Service Planning staff spoke with 166 riders.
1/25/2024	US Itek, Kenilworth Branch Library (Tonawanda); Amherst Branch Library (Amherst)	NFTA Metro Transit Expansion January 2024 Listening Sessions	Tabling	NFTA held listening sessions concerning the Metro Transit Expansion project. The sessions took place US Itek at 1016 Niagara Falls Blvd in Tonawanda, Amherst Branch Library at 350 Audubon Pkwy in Amherst, and Kenilworth Library at 318 Montrose Ave in Tonawanda.
3/7/2024	Perry, Valley, and Old First Ward neighborhoods	Riverline Study Public Meetings	Tabling	Service Planning staff attended a site visit, assisted WNY Land Conservancy and Riverline Study staff in explaining initial findings and gathering community feedback.
3/8/2024	Online/Virtual	GOAL/ABBG surveying	Survey	This is an annual survey given to riders to inform staff on how to make improvements to the bus and rail system.
3/18/2024	On board the 26 Delavan	26 Delavan Onboard Outreach	Route Review	In preparation for an April 3 Route Review meeting, Service Planning staff spoke with 160 riders.
6/2/2024	Elmwood Ave	Pride Parade	Parade	The NFTA-Metro Pride Team marched in the Buffalo Pride Parade with Metro T-shirts and a wrapped bus

6/3/2024	Niagara Falls	55 and Niagara Falls Trolley Onboard Outreach	Route Review	In preparation for a June 25, 2024 Route Review meeting, Service Planning staff spoke with approximately 100 riders.
6/8/2024	Online/Virtual	Parks Adventure Bus Survey	Survey	This is a seasonal survey given to Parks Adventure Bus riders to gain insight on who is riding and how to improve the program for next year.
6/13/2024	Downtown Buffalo	Taste of Buffalo	Tabling	Staff members engaged festival goers with a prize wheel and discussions around MetGo and NFTA job opportunities.
6/17/2024	Martin Luther King Jr. Park	Juneteenth	Parade, Tabling	NFTA-Metro celebrated Juneteenth by marching with the Black History Bus and talking to festival goers about their metro experience.
7/14/2024	East Side (890 Kensington Ave)	Buffalo Community Connectors Farmer's Market	Tabling, Volunteering	Service Planning staff help set up, greet attendees, distribute produce, and inform residents about the Baily BRT project.

NFTA Metro Bus & Rail Public Participation Plan

2018 Revision

Chapter 1. Introduction

About NFTA Metro Bus & Rail

Niagara Frontier Transportation Authority Metro Bus and Rail provides public transportation services (bus, rail, and paratransit) for Erie and Niagara counties. Our mission is to enhance the quality of life of residents and visitors by providing the highest level of safe, clean, affordable, responsive, and reliable public transportation through a coordinated and convenient bus and rail system.

The NFTA Metro system, which serves almost 100,000 people each day, includes:

- 60 bus routes
- 4,600 bus stops
- A 6.4 mile light rail system
- Over 1,000 employees, including over 600 bus and rail operators

Purpose of the Public Participation Plan (PPP) revision

The purpose of NFTA Metro's Public Participation Plan is to set goals for public participation and outreach, outline strategies to achieve those goals, and establish evaluation measures to track progress. NFTA Metro last revised its public participation plan in February 2015. This revision gives NFTA Metro a chance to think broadly about its outreach and participation efforts and to identify strategies to become increasingly effective at public participation.

Goals of the Public Participation Plan

The primary goals of this public participation plan are to:

- Reaffirm NFTA Metro's commitment to seeking public input early and often
- Provide staff with guidance and tools for planning future public participation efforts
- Promote active engagement of stakeholders who have been traditionally underrepresented
- Establish effective evaluation measures to track the agency's progress in public participation

Development of the Public Participation Plan

This public participation plan was developed over the course of several months.

July 2018

- Staff researched best practices for public participation plans at peer transit agencies.
- Staff developed an information preferences survey with the goal of getting input from the public on how they prefer NFTA Metro to conduct outreach.
- Public Participation Plan outline and a draft of the information preferences survey was discussed at the Citizens Advisory Committee (CAC) meeting.

August 2018

- Information preferences survey (titled "NFTA Outreach Survey") was released to the public in English and Spanish.
- Results of the information preferences survey are compiled and incorporated into the plan on an ongoing basis.

September 2018

- Information Preferences survey closed on September 21.
- Final results of the information preferences survey were compiled and incorporated into the plan.
- Draft Public Participation Plan was presented to the CAC.

October 2018

- Staff incorporated CAC comments into the PPP.
- Staff presented the PPP to the NFTA Board of Commissioners.

Federal Requirements

As the recipient of funding from the Federal Transit Administration (FTA), NFTA Metro is committed to fulfilling federal regulations for public participation. This public participation plan goes above and beyond what is required for compliance with FTA guidelines. A detailed description of federal requirements can be found in Appendix A, including the following:

- FTA Program-of-Projects Requirements and Section 5307 Grant Program
- Americans with Disabilities Act (ADA)
- Title VI Adherence
- Limited English Proficiency (LEP)

Chapter 2. Engagement Approach

NFTA Metro has identified five principles that should guide all participation efforts:

- 1. Proactive** – Engage the public early and often, on a regular basis, in conversations about NFTA Metro services. Conduct two-way conversations in which information is shared back and forth between customers and staff.
- 2. Inclusive** – Actively facilitate the involvement of minority, low income, limited English proficiency, and disabled communities. Go out into the community rather than waiting for the community to come to Metro. Tailor engagement efforts to match community needs and preferences.
- 3. Flexible** – Use a wide variety of outreach strategies and adjust as needed. Evaluate and update public participation efforts on a regular basis. Meet people where they are and make it convenient to participate.
- 4. Collaborative** – Foster partnerships with community organizations, philanthropic organizations, government agencies and other potential partners. Partnerships are an efficient and effective way to broaden the reach of our public involvement efforts. Coordination and communication is crucial in working with partners to collectively address community needs.
- 5. Responsive** - Provide timely responses to questions and comments from the public where possible. Build trust by demonstrating where and how public feedback is being used. Be accountable to the public by recognizing and responding to feedback.

Chapter 3. Citizens Advisory Committee (CAC)

The Citizens Advisory Committee (CAC) was established in late 2012 to support and encourage broad-based public participation. The CAC meets every other month to make recommendations and provide input to Metro Management Staff on community transit issues. These regular meetings provide opportunities for proactive, early, and continuing public participation for Metro projects, programs, and decision making. Additionally, CAC members facilitate public involvement by sharing information about surveys, events, and other participation opportunities with their communities.

CAC Mission Statement

The mission of the CAC is to serve the NFTA Board of Commissioners, NFTA Metro management/staff, users and the general public in a proactive role in the development, promotion, and provision of high-quality transportation programs and services.

CAC Guiding Principles

- Value active citizen involvement as essential to the future of the Metro Bus and Rail
- 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 region’s diverse and unique communities

Membership

The CAC has 26 volunteer members, including 4 people who ride the bus (“riders-at-large”) and 22 representatives from community, governmental, and philanthropic organizations who serve transit supportive and transit dependent populations. Currently, the CAC includes the following organizations:

Buffalo Niagara Medical Campus (BNMC)	Riders at Large (6)
Person Centered Services	Coalition for Economic Justice (CEJ)
Erie County Department of Senior Services	Service Employees International Union (SEIU) 1199
National Association for the Advancement of Colored People (NAACP) – Buffalo	National Association for the Advancement of Colored People (NAACP) – Niagara Falls
University Heights Collaborative	Erie Community College (ECC)
Buffalo Urban League	Journey’s End Refugee Services
Citizens for Regional Transit (CRT)	Highland Community Revitalization Committee
Western New York Independent Living	Matt Urban HOPE Center
Community Action Organization (CAO) of WNY	Niagara Falls Housing Authority
Partnership for the Public Good (PPG)	People United for Sustainable Housing (PUSH) Buffalo
GoBike Buffalo	

CAC members are appointed through an application process. The application can be found online at <http://metro.nfta.com/Programs/CAC.aspx>.

Appointed representatives serve a 3-year term, limited to 3 consecutive terms, with consideration available for additional terms. At the end of each calendar year, NFTA Metro staff and the CAC review new applications to the CAC with the goal of filling any vacancies that may have opened up during the year.

Chapter 4. Public Participation Toolbox

Different initiatives at Metro will require different types of public outreach. This toolbox describes many different tools that Metro may use to engage with the public. Not all strategies will be used in every initiative – a flexible and creative approach will be taken with each effort.

In Person

Open House

Open houses are held in the event of a major planning effort or a major service change. At an open house, Metro staff will bring information and materials to a given location for several hours, and the public can drop in at their convenience to talk to staff, ask questions, and voice their opinions. In addition to speaking with the public, staff may conduct surveys or provide comment cards for written feedback.

Public Workshop

Public workshops are held in the event of a major planning effort or a major service change. Workshops typically have a defined start and end time in which participants will work with staff on a specific planning activity. Staff may make a short presentation but most time is spent in group conversations, with small groups of participants working with staff on an activity designed to gather information, issues, and concerns about a given topic.

Public Hearing

NFTA Metro will hold a public hearing or several public hearings in the event of a major service change or a fare change. At a hearing, members of the public sign up to make a short, formal statement to NFTA leadership and to the members of the public in attendance. See Appendix A for NFTA's Public Hearing policy.

Tabling

Tabling is when NFTA Metro staff set up a table in a public space such as at a rail station, transit center, festival, or other community event. Staff bring information in the form of posters and handouts to the table and they talk with the public as they pass by. NFTA Metro frequently conducts tabling outreach, both in conjunction with major planning efforts and for regular, ongoing feedback on Metro services. NFTA Metro often conducts short surveys at these events to gather customer feedback.

Partner Events

NFTA Metro frequently attends standing (regular) meetings or one-time meetings hosted by community or agency partners. At these meetings, Metro may give a presentation, hand out information, have one-on-one or small group conversations with participants, or participate in additional ways as requested by the partner. Metro highly values partner events as an opportunity to engage with diverse groups of people. Metro may conduct a specially tailored survey to learn more about the needs of the community served by the partner.

Surveys or brief interviews on the bus/rail

NFTA Metro conducts surveys and brief interviews with passengers on the bus/rail. Staff approach passengers on the bus/rail and ask if the passenger is willing to take a short survey. The surveys may be specific to a bus line or they may be more general customer satisfaction surveys. The goal is to engage with NFTA customers in the course of their daily travels and to give them a chance to talk share questions and concerns with a staff member. This strategy is also useful in reaching riders who live away from the urban core, such as those using express bus service, who may be more dispersed in where they live and congregate.

Focus Groups

Focus groups are conducted around a specific question, topic, or planning process. For example, NFTA Metro conducted focus groups before undertaking the MetGo fare system change. The purpose of a focus group is to have an in-depth conversation with a group of riders about a specific topic. Focus groups help NFTA Metro identify major issues and concerns early in a process. They are often conducted by an impartial third party in order to promote an open discussion with unbiased moderators.

NFTA Board Meetings and Committees

NFTA Board Meetings typically occur on the fourth Thursday of the month, with committee meetings beginning at 10:00 am and full board meetings beginning at 12:30 pm. The public can attend these meetings, which take place on the sixth-floor boardroom at NFTA's offices, 181 Ellicott St, Buffalo, NY 14203. The board meeting schedule as well as videos from past board meetings can be found at nfta.com.

Rider Alerts

NFTA Metro issues Rider Alerts to make riders aware of upcoming service changes, service interruptions, and planned elevator outages. Rider Alerts are posted on buses, rail cars, at transit centers, and on social media.

Online

[NFTA Metro Website – metro.nfta.com](http://metro.nfta.com)

NFTA Metro's website provides basic information about NFTA Metro, including the most up to date information about fares, schedules, events, programs, and news. Major engagement efforts such as public workshops, informational meetings, and public hearings are advertised on the NFTA Metro website.

Instant Updates (text/email)

Anyone can sign up on the NFTA website to receive Instant Updates by text or email. Instant Updates are sent out to alert users to Metro bus route changes, bus/rail cancellations, special events, news, public meetings, and more. Upon sign up, users indicate which bus routes or topics they would like to receive updates about. Metro's recent survey indicates that Instant Updates are one of the most popular ways that current customers hear important announcements.

Social Media

NFTA Metro maintains Facebook, Twitter, and Instagram accounts. We use these accounts to provide information to the public including Rider Alerts, event information, service changes, job opportunities, and more. While the public can leave comments on NFTA Metro's social media pages and we are sometimes able to respond, social media is not intended to be used as a feedback mechanism. Users should call or email with feedback. See Appendix C for NFTA's Social Media policy.

Email Us

You can send an email with questions, comments, compliments, or concerns to: info@nfta.com. The email will be directed to the appropriate department within NFTA. You can expect a response in 10-14 days, although comments or complaints that require significant investigation may take longer.

Online Surveys

Online surveys are a popular way for customers to provide feedback on a certain topic, or as follow up to a meeting. Online surveys are distributed via the website, Instant Updates, and social media. Surveys are also offered in paper version, and are conducted at events, through partners, and at customer care centers.

By phone

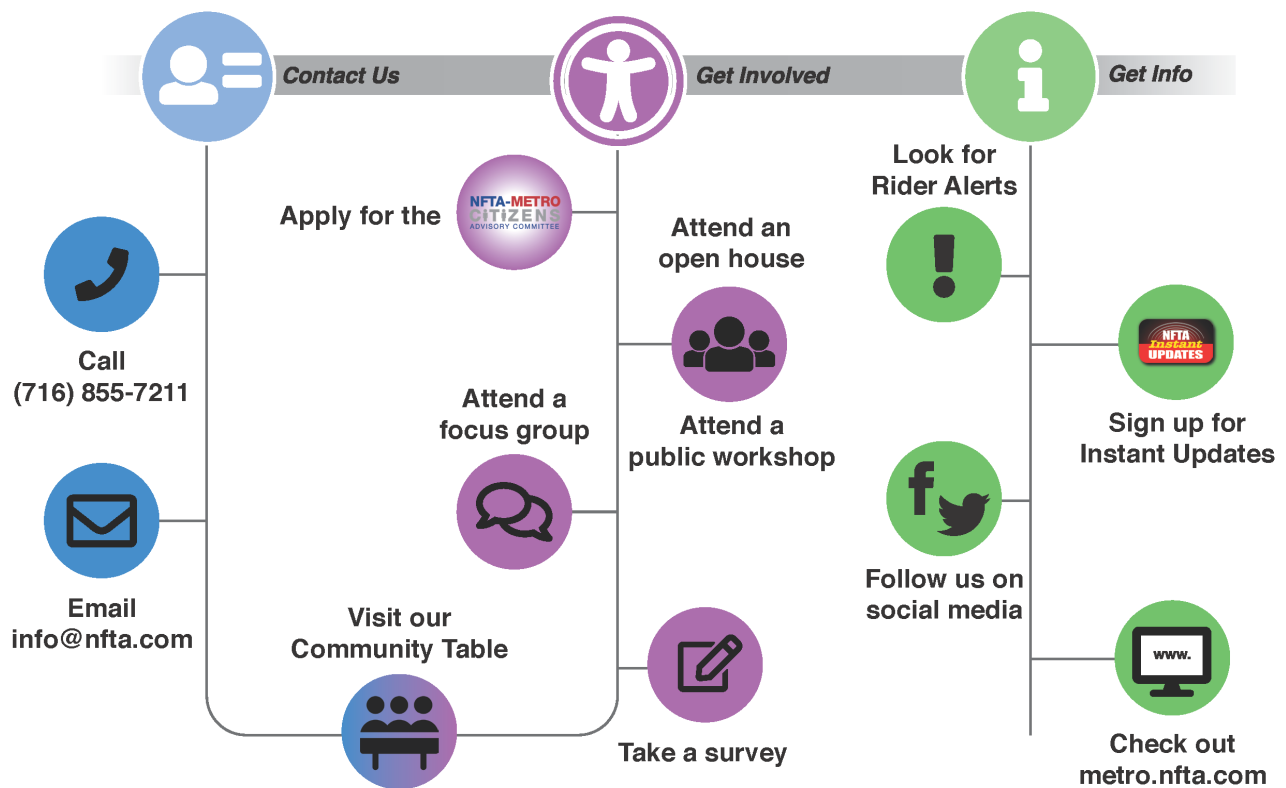
Call NFTA Metro to speak with Customer Care at 716-855-7211 (option 0). Customer Care is open Monday to Friday, 6am to 6pm. They will make sure your question or comment is directed to the right department. They can also provide real time bus schedule information and help design trips for passengers. Outside business hours, automated assistance is available on this phone line.

By mail

You can write a letter to NFTA at: Niagara Frontier Transportation Authority, 181 Ellicott Street, Buffalo, NY 14203.

Public Participation Toolbox Summary

I want to....	Get information	Give feedback	Talk to NFTA Metro staff one-on-one	Talk to NFTA Metro staff in a small group setting	Make a formal statement to NFTA or to a large group	Provide written feedback
NFTA Website						
Instant Updates						
Rider Alerts						
Social Media						
Email						
Phone						
Letter						
Open House						
Public Workshop						
Public Hearing						
Tabling						
Partner Events						
Surveys						
Focus Groups						



5. Equity and Inclusion

NFTA Metro is committed to developing public participation strategies that encourage engagement among traditionally underrepresented populations, including minority, low income, limited English proficiency, and disabled community members.

Below, we describe target populations and identify engagement methods that are recommended based on the Information Preferences survey and a review of best practices nationwide.

Minority populations

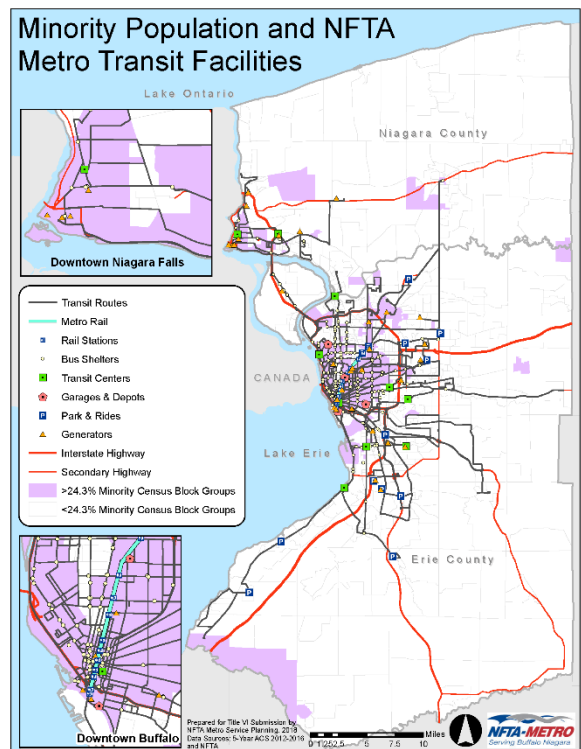
NFTA Metro uses the FTA's definition of minority populations, which includes all categories of race on the American Community Survey (ACS) other than Caucasian/White alone. This includes: Black or African American, American and Alaska Native, Asian, Native Hawaiian and Other Pacific Island, Some Other Race, Two or more races.

Metro identifies minority populations by analyzing American Community Survey (ACS) map data, using our onboard survey, and by working with community partners. Many CAC member organizations serve minority populations.

According to ACS data and the most recent onboard survey conducted in partnership with the Greater Buffalo-Niagara Regional Transportation Council (GBNRTC), minorities make up 26% of the population in the Metro service area and 61% of Metro riders.

All of the tools in Metro's toolbox are relevant to minority populations in the Metro service area. The Information Preferences survey conducted for this plan and a review of best practices suggests that the following outreach techniques are popular among minority customers:

- Instant Updates (text/email)
- NFTA Metro website
- Posters on board the bus/rail (Rider Alerts)
- Social Media
- Tabling in communities with high minority populations
- Attending partner events



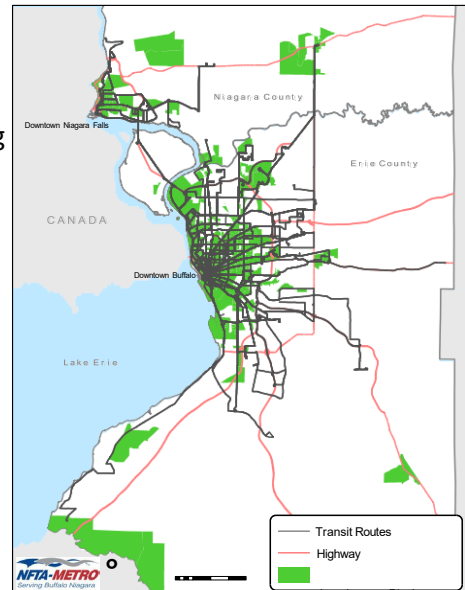
Minority Population in Erie & Niagara Counties – Census block groups in which percent of Minority population exceeds Metro service area average

Low-Income Populations

Low-income populations are those in which the median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines. Metro identifies low-income populations using U.S. Census data and by partnering with community organizations who serve this population. According to our 2017 onboard survey, 58% of Metro riders are low-income, and an additional 16% are classified as being at risk of becoming low-income.

Many of the tools in our Outreach Toolbox can be used to reach low-income populations, but the following are likely to be particularly useful:

- Engaging with community partners and social services organizations to better understand the needs of this population
- Tabling in low-income communities. Bringing engagement to locations where people are already congregating, such as at festivals, community events, or transit stations makes it more convenient for people to participate in NFTA processes.



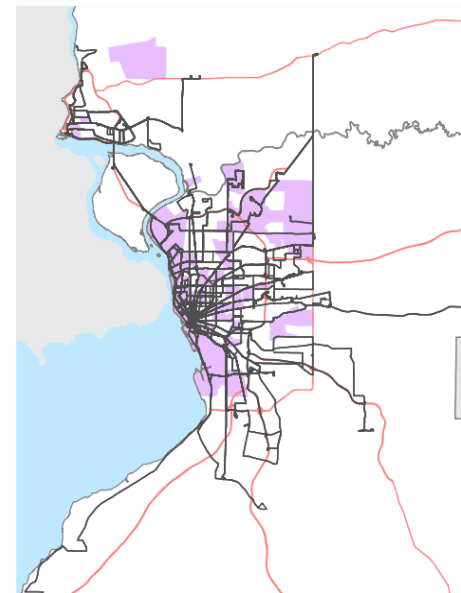
Low-Income Population in Erie & Niagara Counties – Census block groups in which percent of low-income population exceeds Metro service area average

Limited English Proficiently (LEP) populations

LEP populations are households where individuals do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English, or households where no one over age 14 speaks English.

NFTA Metro identifies LEP populations through analyzing American Community Survey data, our Onboard Survey, and through working with community partners. Several current or former CAC member organizations serve LEP communities, including Journey’s End Refugee Services (current), Hispanics United of Buffalo (former), and Buffalo Immigrant and Refugee Empowerment Coalition (former).

According to the 2017 Onboard Survey, 96.3% of Metro customers report a high level of English proficiency, but 77% of speak English at home, almost 8% speak Spanish at home, and the remaining 15% speak Arabic, French, Karen, Burmese, Nepali, Somali, Bengali/Bangla, Swahili, or another language at home.



LEP Population in Erie & Niagara Counties – Census tracts in which percent of LEP population exceeds Metro service area average

Techniques that NFTA Metro will focus on using to reach LEP populations include:

- Partnering with community organizations to provide information and training to LEP populations in the desired languages.
- Partnering with community organizations to conduct culturally sensitive outreach events and surveys in target communities.
- Providing online and printed information in multiple languages and translators at meetings where necessary.

Disabled community

Metro is committed to continuously improving transit access for all people and we recognize that engagement of individuals with disabilities is very important in reaching this goal. The NFTA Advisory Committee on the Disabled meets on the last Thursday of each month (September – June) at 2:00 pm. Membership on the Committee is open to the public. Attendees may bring suggestions, questions, and concerns about NFTA's accessible services and programs for the disabled. Individuals who are interested should call the ADA/EEO Administrator at 716-855-7286 or TTY/Relay 711 or 1-800-662-1220.

Western New York Independent Living, which provides peer services, independent living skills, youth/adult transitional services, advocacy, information, and referral services, is also represented on the Citizens Advisory Committee.

In addition to engaging with representatives on the Advisory Committees, techniques that may help NFTA Metro reach individuals with disabilities include:

- Engaging with community partners and self-advocacy organizations to better understand the needs of this population
- Tabling and presenting at partner events
- Conducting surveys to gather additional information about specific needs and opinions

6. Evaluation

NFTA Metro will monitor and evaluate public participation efforts in order to track the agency's progress in achieving a higher level of public participation.

Type of tool	Measure	Explanation
Online tools: website, instant updates, social media, email, survey	Number of emails received by NFTA with transit-related comments/feedback	Tracking the number of emails received over time will help us understand whether the public is aware that they can email Metro and whether they feel it is worthwhile to do so.
	Number of contacts/organizations in our email database + number of emails sent out to this group	In conjunction with the Public Participation Plan update and the Outreach Survey, we are compiling an email database of organizations to reach out to with participation opportunities (beyond the CAC). This will help us share important information with as many people as possible.
	Number of people enrolled in Instant Updates	Instant Updates are a crucial communication tool that helps Metro alert riders to service interruptions and other important announcements. Having more people enrolled in Instant Updates means that more people will receive this information and will be able to plan accordingly.
	Percentage of service interruptions that are reported via Instant Updates	Not all service changes (cancellations, reroutes, etc) are sent out as Instant Updates. Metro is working to improve communication channels to ensure that all service changes are sent out via Instant Updates so that riders are aware of these changes.
	Number of surveys completed	Surveys are an important tool for seeking feedback on specific issues. Increasing the number of surveys completed will improve the quality of Metro data and allow us to make fully informed decisions.
	Demographics of survey participants (demographic questions always optional)	Tracking the demographics of survey participants and comparing that data to the demographics of a given area will help Metro understand if we are reaching and hearing from affected communities.
	Percent of surveys in which results are reported back to the public	In order to recognize that survey feedback is being heard and understood, survey results should be released back to the public.
	Media Mentions for Metro Bus and Rail	Media mentions are the number of times Metro Bus and Rail are mentioned in traditional news outlets (print, TV, radio, web). More media mentions help keep the community up to date on our initiatives and operational changes.

Type of tool	Measure	Explanation
In person tools: open house, public workshop, public hearing, tabling, surveys, focus groups	Number of participants who attend meetings/activities	Tracking the number of participants at meetings and activities will help Metro understand if the event was sufficiently publicized and if the event is convenient for the public to attend.
	Percent of meetings/activities in which results are reported back to attendees	In order to recognize that feedback is being heard and understood, meeting results should be released back to meeting attendees.
	Customer satisfaction surveys at regular events	Metro conducts customer satisfaction surveys at tabling events and on the bus. Tracking customer satisfaction helps Metro identify problems and plan improvements.
CAC	CAC self-assessment average rating	The CAC completes an annual self-assessment that asks committee members to indicate their level of satisfaction with different aspects of the committee. The assessment helps staff evaluate committee member satisfaction and identify problem areas for further discussion.
Partnerships	Number of presentations made to/with partner organizations	The number of events conducted with partners will help us measure whether we are reaching out to partners and offering information and activities that partners find valuable. Holding more events with partners will increase the reach of our public participation efforts.

Appendix A: Public participation as required by law

Appendix B: Social Media policy

Appendix C: Information Preferences Survey and Results

Appendix A: Public Participation as Required by Law

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Title VI – Your Rights Under Title VI of the Civil Rights Act of 1964

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.

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.



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 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

Title VI Adherence

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. NFTA submitted the 2018 update to the Title VI program in August 2018 and FTA approval is pending. The full submission can be found on NFTA's website at:

http://www.nfta.com/pdfs/2018/public_info/TitleVI2018NFTASubmission.pdf

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) Plan

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.

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

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.

Americans 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.

**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.

Appendix B: NFTA Metro Social Media Policy

Social media is an important form of communication and a valuable tool in NFTA Metro’s public participation toolbox. Social media channels allow NFTA Metro to reach a broader audience and provide a forum for people to share relevant and timely information on NFTA Metro activities and services.

NFTA Metro values the communication and engagement opportunities afforded by social media. Because there are many ways that individuals, companies, and agencies use social media, NFTA Metro has developed the following guidelines.

Guidelines

NFTA Metro operates and maintains its social media sites to provide information to the public about NFTA Metro services, projects, events, and activities. It is used to supplement traditional communication methods. Social media sites that may be used are (but not limited to): Facebook, Twitter, Instagram, LinkedIn, and YouTube.

One of the most valuable aspects of social media is the ability for individuals and organizations to share content. NFTA Metro encourages other organizations and individuals to share relevant content from NFTA Metro’s social media pages with the goal of reaching more people with valuable information.

NFTA Metro uses social media primarily to spread information rather than to collect feedback. While NFTA Metro social media sites are closely monitored, information received from social media users in the form of comments, @replies, direct messages, or any other method allowed by third-party social media sites will be treated as discussion and do not constitute official public comment to NFTA Metro. To submit official comments, users should call NFTA Metro at (716) 855-7211 or email info@nfta.com.

Information received on social media may be summarized and shared with NFTA Metro staff, leadership, or Board of Commissioners. The use of social media will follow all federal, state, and local related laws and/or policies regarding the sharing of information, collection of data, and archiving.

Content

NFTA Metro may use social media channels to share Rider Alerts and other service updates, employment opportunities, surveys, event information, and other content relevant to NFTA Metro customers, visitors, and the general public.

Public comments on NFTA Metro-generated content should be limited to comments related to the posted topic. NFTA Metro social media channels are not the proper place to express opinions or beliefs not directly related to subjects or areas in which NFTA Metro conducts its business.

NFTA Metro may share articles, websites, or online information produced by outside sources as appropriate. NFTA Metro may share these items as “information only” and does not endorse, support or have responsibility for the accuracy of these items.

NFTA Metro does not allow explicit or profane language or content that promotes, fosters, or perpetuates discrimination on the basis of race, creed, color, age, religion, gender, marital status, status with regard to public assistance, national origin, physical or mental disability or sexual orientation, nor is sexual content or links to sexual content allowed.

NFTA Metro does not allow solicitations or advertisements or comments that include spam.

NFTA Metro does not allow comments that suggest, encourage, or incite illegal activity, comments containing specific or imminent physical threats, or comments that may tend to compromise the safety or security of NFTA, the public or public systems.

NFTA Metro social media channels are not open to comments promoting or opposing any person campaigning for election to a political office or promoting or opposing any ballot proposition.

NFTA Metro does not allow comments infringing on copyrighted or trademarked material, or any other unlawful comments.

NFTA Metro reserves the right to remove any material on their social media sites which violates this policy. If available, NFTA Metro may also use a social media site's "blocking" feature for repeat offenders of the content guidelines.

User Privacy

Summary

NFTA Metro does not collect or store the personal information of social media users except when required by law.

Details

NFTA Metro recognizes and respects the privacy of users of social media users. When users choose to provide the agency with personal information, NFTA Metro will act in a responsible manner. NFTA Metro may store and disclose personal information as allowed or required by applicable law, including making disclosures that are necessary or advisable to (i) protect the rights, safety or property of NFTA or others and (ii) conform to legal or regulatory requirements. Unless authorized by you, NFTA Metro will not trade, sell or rent your personal information but may collect and/or provide aggregate statistics about its web site and users to other parties. NFTA Metro has no intention of collecting any personal data from individuals under 13 years of age.

This site does contain links to other web sites and NFTA does not control the privacy policies of those sites. Accordingly, NFTA does not make any representations concerning the privacy practices or terms of use of such sites, nor does NFTA control or guarantee the accuracy, integrity, or quality of the information in any form available on such sites.

Please note that social media sites such as Facebook or Twitter may have their own privacy policies that may differ from NFTA.

This policy statement is subject to amendment or modification at any time to ensure its continued use is consistent with its intended purpose. Questions or concerns regarding NFTA Metro presence on social media should be directed to info@nfta.com.

Appendix C: Information Preferences Survey & Results

NFTA Metro conducted an Information Preferences survey in order to learn more about how our customers want us to reach out to them and how they want to communicate with us. We received over 700 responses.

The survey was available online in English and Spanish from August 20 to September 21, 2018. It was publicized weekly on NFTA Metro social media channels. It was shared through social media or email listserves by the following CAC organizations: Buffalo Transit Riders United, Citizens for Regional Transit, Community Action Organization of WNY, Partnership for the Public Good, Go Bike Buffalo, Journey's End Refugee Services, NAACP Buffalo, and the NAACP Niagara Falls. The Greater Buffalo Niagara Transportation Council, Buffalo State, and the University at Buffalo also sent the survey out to their email listserves.

The survey was available in paper copy at the Customer Care desk in the MTC bus station at 181 Ellicott St, the Niagara Falls Housing Authority, the Puerto Rican and Hispanic Day Parade/Festival (August 18-19), the BNMC Clean Vehicle event (Sept 20), and Good for the Neighborhood West Side (October 11).

In this appendix, we have provided a copy of the survey in English and Spanish (p. 51, 52).



NFTA-METRO Outreach Survey

How do you want us to reach out to you?

1. Have you ever attended a public meeting or workshop to provide NFTA-Metro with feedback on potential projects and service changes?
 Yes No Unsure

2. How do you currently receive information from Metro? Select all that apply.
 Metro website Calling NFTA-METRO Customer Service
 Printed schedules Printed (newspaper) advertisements
 At the bus stop Social media (Facebook, Twitter)
 Other websites Large posters at transit centers
 Word of mouth Google/Google Transit
 Radio TV
 Posters onboard the bus/rail (Rider Alerts)
 Email /Text Message (Instant Updates)
 Other (please explain _____)

3. If Metro has an important announcement (for example, a service change), how do you want us to share this information? Select all that apply.
 Metro website Printed (newspaper) advertisements
 Radio TV
 Social media (Facebook, Twitter)
 Large posters at transit centers
 Posters onboard the bus/rail (Rider Alerts)
 Email /Text Message (Instant Updates)
 Announcement from community group
 Other (please explain _____)

4. How should Metro spread the word about upcoming meetings, events, or opportunities to get involved? Select all that apply.
 Metro website Printed (newspaper) advertisements
 Email Social media (Facebook, Twitter)
 Text Message Postcard or letter in mail
 Posters onboard the bus/rail (Rider Alerts)
 Large posters at transit centers
 Announcement from community group
 Radio announcement
 Other (please explain _____)

5. What time is best for you to attend a meeting or event? Select 1.
 Business hours (8am to 5pm)
 Weekday lunch hour (12pm to 1pm)
 Weekday evenings (5pm to 7pm)
 Weekends
 Other (please explain _____)

6. What is the best location for you to attend a Metro meeting or event? Select 1.
 Downtown Buffalo
 Downtown Niagara Falls
 In the community affected by the proposed change
 Other (please explain _____)

7. How are you most comfortable sharing your views at meetings? Select 1.
 Large group discussion Electronic voting
 Small group discussion Written survey
 One-on-one discussion Comment card
 Written material in my preferred language
 Speaking at a hearing
 Other (please explain _____)

8. What is the best way to present information to you at a meeting? Select 1.
 Information online for review before meeting
 Live presentation at meeting
 Tabletop display to look at before/during meeting
 Map, chart, or other visual aids at meeting
 Other (please explain _____)

9. In addition to a meeting, what is the best way for you to provide Metro with information? Select 1.
 Online survey Mail back survey
 Comments by email Focus group
 Call NFTA-Metro's customer service line
 Write letter
 Other (please explain _____)

10. NFTA-Metro would like to keep you informed of how your comments influence our decisions. What is the best way to inform you of our actions after meetings? Select 1.
 NFTA-Metro website Email Regular mail
 Social media (Facebook, Twitter)
 Other (please explain _____)

11. Can you name any community groups, educational organizations, or religious groups that you know about where NFTA-Metro could send information about upcoming changes, projects, and participation opportunities?

The following questions are optional. They will help us in our effort to reach different populations with this survey.

What is your age?
 Under 16 19-24 35-49 65 or older
 16-18 25-34 50-64

Are you of Hispanic, Latino, or Spanish origin?
 Yes No Unsure

Which of the following best describes your race? Select all that apply.
 American Indian or Alaska Native
 Asian Black or African American
 Native Hawaiian or Other Pacific Islander White

I identify my gender as:
 Male Female
 Other (_____) Prefer not to say

What is your zip code? _____



NFTA-METRO Encuesta de Alcance
¿Cómo quiere que NFTA-Metro lo Contacté?

1. ¿Alguna vez asistió a una reunión pública o taller para proporcionar a NFTA-Metro comentarios sobre posibles proyectos y cambios en los servicios?
 Si No Inseguro

2. ¿Cómo recibe actualmente información de Metro?
 Seleccione todas las que correspondan.

- | | |
|---|--|
| <input type="checkbox"/> Sitio web de NFTA Metro | <input type="checkbox"/> Horarios impresos |
| <input type="checkbox"/> Google / Google Transito | <input type="checkbox"/> Televisión |
| <input type="checkbox"/> En la parada de autobús | <input type="checkbox"/> Radio |
| <input type="checkbox"/> Anuncios impresos (de periódicos) | <input type="checkbox"/> Otros sitios web |
| <input type="checkbox"/> Redes sociales (Facebook, Twitter) | <input type="checkbox"/> Boca a boca |
| <input type="checkbox"/> Llamando a Servicio al cliente de NFTA | |
| <input type="checkbox"/> Carteles a bordo del autobús / tren (Alertas de pasajeros) | |
| <input type="checkbox"/> Carteles grandes en los centros de tránsito | |
| <input type="checkbox"/> Correo electrónico / mensaje de texto | |
| <input type="checkbox"/> Otro (por favor explique _____) | |

3. Si Metro tiene un anuncio importante (por ejemplo, cambio de servicio), ¿cómo desea que compartamos esta información? Seleccione todas las que correspondan

- | | |
|---|--|
| <input type="checkbox"/> Anuncio del grupo de la comunidad | <input type="checkbox"/> Sitio web de NFTA Metro |
| <input type="checkbox"/> Anuncios impresos (de periódico) | <input type="checkbox"/> Radio |
| <input type="checkbox"/> Redes sociales (Facebook, Twitter) | <input type="checkbox"/> Televisión |
| <input type="checkbox"/> Carteles a bordo del autobús / tren (Alertas de pasajeros) | |
| <input type="checkbox"/> Carteles grandes en los centros de tránsito | |
| <input type="checkbox"/> Correo electrónico / mensaje de texto | |
| <input type="checkbox"/> Anuncio del grupo de la comunidad | |
| <input type="checkbox"/> Otro (por favor explique _____) | |

4. ¿Cómo deberíamos difundir las próximas reuniones, eventos u oportunidades para involucrarnos? Seleccione todas las que correspondan

- | | |
|---|---|
| <input type="checkbox"/> Sitio web NFTA Metro | <input type="checkbox"/> Anuncio de Radio |
| <input type="checkbox"/> Correo electrónico | <input type="checkbox"/> Anuncios impresos (de periódico) |
| <input type="checkbox"/> Mensaje de texto | <input type="checkbox"/> Postal o carta en el correo |
| <input type="checkbox"/> Carteles a bordo del autobús / tren (Alertas de pasajeros) | |
| <input type="checkbox"/> Carteles grandes en los centros de tránsito | |
| <input type="checkbox"/> Anuncio del grupo de la comunidad | |
| <input type="checkbox"/> Redes sociales (Facebook, Twitter) | |
| <input type="checkbox"/> Otro (por favor explique _____) | |

5. ¿A qué hora del día es mejor que asista a una reunión o evento de Metro? (elijá 1)

- | |
|---|
| <input type="checkbox"/> Horario comercial (de 8:00 a.m. a 5:00 p.m.) |
| <input type="checkbox"/> Horario del almuerzo de lunes a viernes (de 12:00 a 1:00 p.m.) |
| <input type="checkbox"/> Tardes de lunes a viernes (de 5 p.m. a 7 p.m.) |
| <input type="checkbox"/> Fines de semana |
| <input type="checkbox"/> Otro (por favor explique _____) |

6. ¿Cuál es la mejor ubicación para asistir a una reunión o evento de Metro? (elijá 1)

- | | |
|---|---|
| <input type="checkbox"/> Downtown Buffalo | <input type="checkbox"/> Downtown Niagara Falls |
| <input type="checkbox"/> En la comunidad que se verá afectada por el cambio | |
| <input type="checkbox"/> Otro (por favor especifique _____) | |

7. ¿Cómo se siente más cómodo compartiendo sus puntos de vista en una reunión de Metro? (elijá 1)

- | | |
|--|--|
| <input type="checkbox"/> Discusión en grupo grande | <input type="checkbox"/> Encuesta escrita |
| <input type="checkbox"/> Discusión uno-a-uno | <input type="checkbox"/> Tarjeta de comentario |
| <input type="checkbox"/> Votación electrónica | <input type="checkbox"/> Hablando en una audiencia |
| <input type="checkbox"/> Discusión en grupos pequeños (menos de 10 personas) | |
| <input type="checkbox"/> Material escrito traducido en mi idioma preferido | |
| <input type="checkbox"/> Otros (especifique _____) | |

8. ¿Cuál es la mejor manera de presentarle información en una reunión? (elijá 1)

- | |
|--|
| <input type="checkbox"/> Información en línea para su revisión antes de la reunión |
| <input type="checkbox"/> Presentación en vivo en la reunión |
| <input type="checkbox"/> Pantalla de mesa para mirar antes / durante la reunión |
| <input type="checkbox"/> Mapa, gráfico u otras ayudas visuales en la reunión |
| <input type="checkbox"/> Otro (por favor explique _____) |

9. Además de una reunión, ¿cuál es la mejor manera de proporcionar información a Metro? (elijá 1)

- | | |
|---|---|
| <input type="checkbox"/> Encuesta en línea | <input type="checkbox"/> Grupo de enfoque |
| <input type="checkbox"/> Encuesta por correo | <input type="checkbox"/> Escribir carta |
| <input type="checkbox"/> Comentarios por correo electrónico | |
| <input type="checkbox"/> Llamar a la línea de Servicio al Cliente de NFTA | |
| <input type="checkbox"/> Otro (por favor explique _____) | |

10. Nos gustaría mantenerlo informado acerca de cómo sus comentarios influyen en nuestras decisiones. ¿Cuál es la mejor manera de informarle sobre nuestras acciones después de las reuniones? (elijá 1)

- | | |
|---|---|
| <input type="checkbox"/> Sitio web de NFTA Metro | <input type="checkbox"/> Correo regular |
| <input type="checkbox"/> Redes sociales (Facebook, Twitter) | <input type="checkbox"/> Email |
| <input type="checkbox"/> Otro (por favor explique _____) | |

11. ¿Puede nombrar a cualquier grupo comunitario, organización educativa o grupo religioso que conozca acerca de dónde NFTA-Metro podría enviar información sobre los próximos cambios, proyectos y oportunidades de participación?

Las siguientes preguntas son opcionales. Nos ayudarán en nuestro esfuerzo por llegar a diferentes grupos con esta encuesta.

¿Cuál es tu edad? Menores de 16 años
 16-18 25-34 50-64
 19-24 35-49t 65 años o más

¿Eres de origen hispano, latino o español?
 Si No Inseguro

¿Cuál de los siguientes describe mejor a tu raza?

- | | |
|---|---|
| <input type="checkbox"/> Indio americano o nativo de Alaska | <input type="checkbox"/> Negro o afroamericano |
| <input type="checkbox"/> Asiático | <input type="checkbox"/> Nativo de Hawai o Islas del Pacífico |
| <input type="checkbox"/> Blanco / Caucásico | |

¿Cuál es su género?

- | | |
|-------------------------------------|--|
| <input type="checkbox"/> Masculino | <input type="checkbox"/> Femenino |
| <input type="checkbox"/> Otro _____ | <input type="checkbox"/> Prefiero no decirlo |

¿Cuál es su código postal? _____

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

Dejuan Hardy, Manager

Wafa Dubashi, ADA/EEO

EEO/Diversity Development

(716) 855-7488

NFTA Limited English Proficiency Plan

Table of Contents

- I. Goal
- II. Limited English Proficiency
- III. Four-Factor Analysis
- IV. Implementation Plan
- V. Appendix

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 trolleybuses. We provide bus service to Buffalo, Lockport, Niagara Falls, and all points in between. See Appendix B of this chapter.

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 Fillmore-Hertel
5 Niagara-Kenmore	26 Delavan
12 Utica	32 Amherst
20 Elmwood	35 Sheridan
22 Porter-Best	40 Buffalo/Niagara Falls

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)

Figure 9: 2022 American Community Survey 5-year estimate: Table S1601 Language Spoken at Home

	Erie County Total Population	Speak English Less than Very Well	Niagara County Total Population	Speak English Less than Very Well	Total % Speak English less than very well
Total population 5 years and older	900,851	37,455	201,426	3,578	4.2%
Speak a language other than English:					
Spanish	29,991	9,828	3,555	1,187	32.8%
Other Indo-European languages	34,895	12,918	4,716	1,651	37%
Asian and Pacific Island languages	17,882	8,237	2,803	408	46.1%
Other and unspecified languages	16,488	6,472	1,070	332	39.3%
	Erie County Total Population	Speak English Less than Very Well	Niagara County Total Population	Speak English Less than Very Well	Total % Speak English less than very well
Total population 5 years and older	900,851	37,455	201,426	3,578	4.2%
Speak a language other than English:					
Spanish	29,991	9,828	3,555	1,187	32.8%
Other Indo-European languages	34,895	12,918	4,716	1,651	37%

Analyze the data collected

- **Erie County:**

A review of the 2022 American Community Survey of the U.S. Census Report indicates Erie Counties largest LEP population is Other Indo-European languages. Among people who speak Other Indo-European languages at home, approximately 12,918 (37%) speak English less than “very well.”The total estimate of people living in Erie County is 900,851. Of this group:

- 801,595 speak only English.
- 29,991 speak Spanish (9,828 of whom speak English less than “very well”).
- 99,256 speak other languages (37,455 of whom speak English less than “very well”).

The Buffalo School District reports the number of English Language Learner (ELL) students in the Buffalo schools has decreased from 5,320 for the 2019-2020 to 5,069 for the 2022-203 school year.

- **Niagara County:**

A review of the 2022 American Community Survey of the U.S. Census Report indicates Niagara Counties largest LEP population is Other Indo-European languages. Among people who speak Other Indo-European languages at home, 4,716 (35%) speak English less than “very well”. The total estimate of people living in Niagara County is 201,426. Of this group:

- 190,994 speak only English.
- 3,555 speak Spanish (1,187 of whom speak English less than “very well”).
- 10,432 speak other languages (of whom 3,578 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 of this chapter)

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:

1 William	14 Abbott
2 Clinton	15 Seneca
3 Grant	16 South Park

4 Broadway	20 Elmwood
5 Niagara-Kenmore	24 Genesee
6 Sycamore	25 Delaware
8 Main	40 Grand Island
11 Colvin	42 Lackawanna

Hispanics United of Buffalo is a Human Service Agency that serves more than 650 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 8th grade through 11th 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, In the 2021 onboard survey, 4% of riders surveyed indicated that they spoke English “less than very well” or “not at all.”
- Of the people surveyed who indicated that they spoke English “less than very well” or “not at all,” 58% were transit dependent, and 60% reported that they 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 \$1,346.00.

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.

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 99,256. 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 10,432. This group is a combined grouping of all languages in Niagara County other than English.
- Fixed routes 3, 5, 12, 20, 22, 23, 26, 32, 35, 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 iib@iibuff.org 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
- 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.

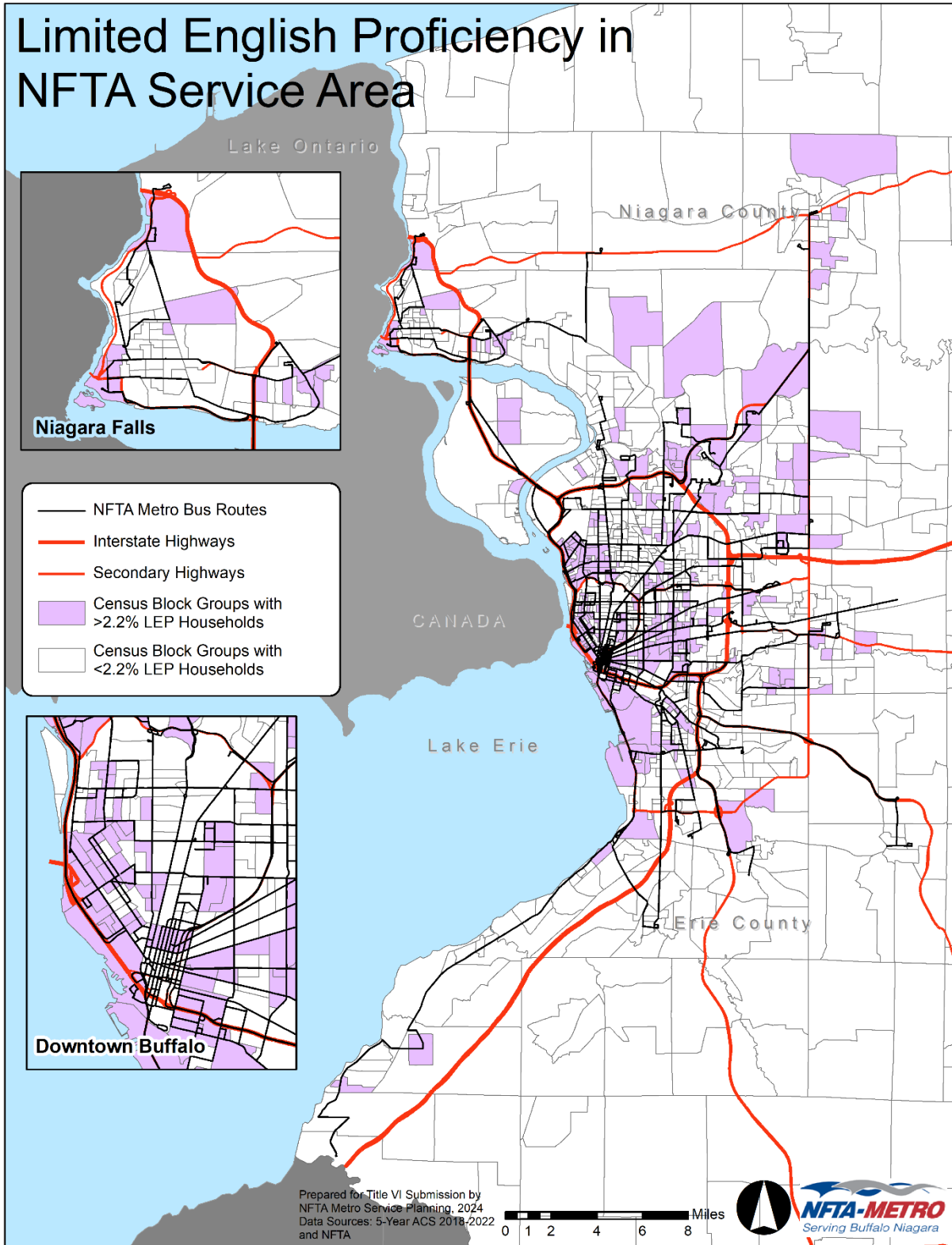
Ongoing assessment of staff and operator training through monitoring and communication with appropriate departments will drive training using best practices.

Appendix A - 2022 ACS Table S1601 Language Spoken at Home

Erie County, New York						
Total						
			Speak English less than "very well"		Percent speak English less than "very well"	
Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	900,851	±62	37,455	±1,718	4.2%	±0.2
Speak only English	801,595	±2,805	(X)	(X)	(X)	(X)
Speak a language other than English	99,256	±2,795	37,455	±1,718	37.7%	±1.4
SPEAK A LANGUAGE OTHER THAN ENGLISH						
Spanish	29,991	±1,237	9,828	±818	32.8%	±2.3
Other Indo-European languages	34,895	±2,025	12,918	±1,154	37.0%	±2.5
Asian and Pacific Island languages	17,882	±1,190	8,237	±944	46.1%	±3.6
Other languages	16,488	±1,913	6,472	±1,083	39.3%	±4.2
Niagara County, New York						
Total						
			Speak English less than "very well"		Percent speak English less than "very well"	
Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	201,426	*****	3,578	±576	1.8%	±0.3
Speak only English	190,994	±1,024	(X)	(X)	(X)	(X)
Speak a language other than English	10,432	±1,023	3,578	±576	34.3%	±4.1
SPEAK A LANGUAGE OTHER THAN ENGLISH						
Spanish	3,555	±572	1,187	±355	33.4%	±7.3
Other Indo-European languages	4,716	±780	1,651	±395	35.0%	±5.9
Asian and Pacific Island languages	1,091	±274	408	±161	37.4%	±11.5
Other languages	1,070	±391	332	±244	31.0%	±16.4

Appendix B - LEP MAP

Limited English Proficiency in NFTA Service Area



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 E - Language Card

Sign Language Interpreter

Albanian Shqip 🗣️
Tregoni me gisht gjuhën tuaj. Do të thërrasim një përkthyes. Përkthyesi do të merret falas për ju.

Arabic عربي 🗣️
أشرف إلى لغتك. وسوف يتم جلب مترجم فوري لك. سيتم تأمين المترجم الفوري مجاناً.

Bengali বাংলা 🗣️
আপনার ভাষার দিকে নির্দেশ করুন। একজন দোভাষীকে ডাকা হবে। দোভাষী আপনি নিখরচায় পাবেন।

Bosnian Bosanski 🗣️
Pokažite svoj jezik. Prevodilac će biti pozvan. Prevodilac je obezbijeden bez troškova za vas.

Burmese မြန်မာ 🗣️
သင့်ဘာသာစကားကို ညွှန်ပြပါ။ စကားပြန် ခေါ်ဝေါ်ပေးပါ။ သင့်အတွက် စကားပြန် အခမဲ့ ပေးပါမည်။

Chinese 中文 🗣️
請指認您的方言，以便為您提供免費口譯服務。 請指認您的方言，以便為您提供免費口譯服務。

Cantonese 廣東話 广东话 🗣️

Chaochow 潮州話 潮州话 🗣️

Fukienese 福建話 福建话 🗣️

Mandarin 國語 普通话 🗣️

Shanghai 上海話 上海话 🗣️

Taiwanese 台灣話 台湾话 🗣️

Toishanese 台山話 台山话 🗣️

Farsi فارسی 🗣️
به زبان مورد نظر اشاره کنید. ما برای شما مترجم می آوریم. این کار هیچ هزینه ای برای شما نخواهد داشت.

French Français 🗣️
Pointez vers votre langue et on appellera un interprète qui vous sera fourni gratuitement.

Haitian Creole Kreyòl 🗣️
Lonje dwèt ou sou lang ou pale a epi n ap rele yon entèprèt pou ou. Nou ba ou sèvis entèprèt la gratis.

Hindi हिंदी 🗣️
अपनी भाषा पर इंगित करें और एक दुभाषिया बुलाया जाएगा। दुभाषिये का प्रबंध आप पर किना किसी खर्च के किया जाता है।

Italian Italiano 🗣️
Puntare sulla propria lingua. Un interprete sarà chiamato. Il servizio è gratuito.

Karen ကာကညီကျိတ် 🗣️
ဒုးနဲဒ်ဆူနဲကျိတ်တက့ၢ်. တၢ်တတဲးန့ၢ်န့ၢ်ပုၤတဲၤတၢ်တၢ်တၢ်. ပုၤတဲၤတၢ်တၢ်တၢ်ဆဲးတၢ်တၢ်န့ၢ်ဆူပုၤတၢ်.

Korean 한국어 🗣️
귀하께서 사용하는 언어를 지적하시면 해당 언어 통역 서비스를 무료로 제공해 드립니다.

Nepali नेपाली 🗣️
आफ्नो भाषालाई आँल्याउनुहोस्। एक दोभाषेलाई बोलाइनेछ। तपाईंको किन कुनै खर्चको, एकजना दोभाषे उपलब्ध गराइनेछ।

Pashto پښتو 🗣️
خپل ژبې ته اشاره وکړئ. یو ژباړونکی به را و بللی ش. تاشو ته ژباړونکی ویریا برابر ولی شی.

Polish Polski 🗣️
Proszę wskazać swój język i wezwijemy tłumacza. Tłumacza zapewnimy bezpłatnie.

Portuguese Português 🗣️
Indique o seu idioma. Um intérprete será chamado. A interpretação é fornecida sem qualquer custo para você.

Russian Русский 🗣️
Укажите язык, на котором вы говорите. Вам вызовут переводчика. Услуги переводчика предоставляются бесплатно.

Somali Afsoomaali 🗣️
Farta ku fiiq luqadaada... Waxa laguugu yeeri doonaa turjubaan. Turjubaanka wax lacagi kaaga bixi mayso.

Spanish Español 🗣️
Señale su idioma y llamaremos a un intérprete. El servicio es gratuito.

Swahili Kiswahili 🗣️
Onyesha lugha yako. Ataitishwa mkalimani. Utapewa mkalimani bila ya gharama yoyote kwako.

Tagalog Tagalog 🗣️
Ituro po ang inyong wika. Isang tagasalin ang ipagkakaloob nang libre sa inyo.

Thai ไทย 🗣️
ช่วยชี้ที่ภาษาที่ท่านพูด แล้วเราจะจัดหาคนให้ทาน การใช้สละไม่ต้องเสียค่าใช้จ่าย

Ukrainian Українська 🗣️
Вкажіть вашу мову. Вам викличуть перекладача. Послуги перекладача надаються безкоштовно.

Urdu اُردو 🗣️
اپنی زبان پر اشارہ کریں اور ایک ترجمان بلايا جاگا. ترجمان کا انتظام آپ پر بغیر کسی خرچ کے کیا جاتا ہے.

Vietnamese Tiếng Việt 🗣️
Hãy chỉ vào ngôn ngữ của quý vị. Một thông dịch viên sẽ được gọi đến, quý vị sẽ không phải trả tiền cho thông dịch viên.

Yiddish אידיש 🗣️
ווייזט אן אויף איינער שפראך און מ'זעט רופן א דאלמעטשער. דער דאלמעטשער ווערט צוגעשטעלט אויסט. עס וועט אייך גארנישט קאסטן.

Appendix F

Currently, in the 2022-2023 school year, there are 82 different languages spoken by Buffalo City School District students—Spanish (1,847), Bengali (533), Arabic (515), Swahili (437), and Karen (411) are the five most common languages spoken by English language learners. These top five languages represent 80.8% of total ELL population.

Data Focus: Languages Spoken in the Buffalo Public Schools

	Number of Students	Number of Languages Spoken
2019 - 2020	5,320	84
2020 - 2021	5,368	83
2021 - 2022	5,337	83
2022 - 2023	5,069	82

Source: Buffalo Public School District ELL Data

Rank	Language	Number of Students
1	Spanish	1847
2	Bengali	533
3	Arabic	515
4	Swahilli	437
5	Karen	411
1	Spanish	1847

Source: Buffalo Public Schools KPI Compendium 2022-2023

Sources

- U.S. Census Bureau
- 2019 American Community Survey 5-Year Estimates Subject Tables
- Partnership for the Public Good
- Immigrants, Refugees, and Languages Spoken in Buffalo
- Buffalo School District Data
- Hispanics United of Buffalo

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 and wide representation of current users of the NFTA Metro Bus and Rail System. NFTA reaches out to organizations and groups representing minority and LEP populations when there is a vacancy on the CAC. Membership may include, but shall not be limited to NFTA Metro 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 the table below. The membership is 48% minority.

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

Figure 10- CAC Membership by Race

Race	Caucasian	Latino	African American	Asian American	Native American	Two or More Races
General Population	77%	5%	12%	3%	1%	2%
Citizens Advisory Committee	52%	5%	38%	5%	0%	0%

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: NFTA with FTA developed a Project Management Plan (PMP) for each subrecipient in 2010. The PMP was developed originally for JARC and New Freedom subrecipients to provide guidance on federal grant requirements including but not limited to Title VI regulations.

The PMP identifies Title VI requirements while each subrecipient's Memorandum of Understanding (MOU) further outlines the requirements and describes monitoring and corrective procedures. Prior to signing the MOU, NFTA and each subrecipient meet to review and discuss all the requirements of the funding including but not limited to Title VI. The PMP outlines the process by which NFTA is to verify that requirements are being met. Subrecipients are required to sign 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. The reported location of each subrecipient's notice to beneficiaries is submitted in a verification form and is confirmed during site visits.

If a subrecipient is not in compliance as verified through a compliant, site visit or program review or requires additional assistance to develop and adopt their Title VI program, NFTA staff works directly with the subrecipient to provide appropriate and individualized assistance to ensure compliance. This may include providing data and information relevant to the development and adoption of the subrecipient program components.

Subrecipients must also report quarterly on any complaints. 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.

Currently, the NFTA has one subrecipient – the United Way of Buffalo and Erie County. Since 2017, the United Way has managed a program called Go Buffalo Moms under the Federal Rides to Wellness Program.

Go Buffalo Mom is a travel education/planning and financial planning/savings program for low-income high risk pregnant women with challenges accessing prenatal care due to transportation. The service is designed for ease of use, affordability, and is built around one-on-one relationships between the patient and transportation navigator and the patient and financial counselor. The program is delivered at prenatal clinics within the city of Buffalo and targeted to a very specific demographic.

Like all previous subrecipients, the United Way received a PMP and signed an MOU outlining their requirements to comply with Title VI. The United Way has an equity and anti-racism plan but chose to adopt NFTA's Title VI plan for the Go Buffalo Mom program. The United Way provides beneficiaries of the program notification of their rights under Title VI and procedures to file a complaint through the program intake process as verified through NFTA's review of program documentation.

United Way reports quarterly on the progress of the project. They have not received any Title VI complaints to date. In addition, the NFTA participates in quarterly program coordination and implementation meetings, providing additional oversight for the program as needed.

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 sited or constructed any new storage/maintenance facilities or operations centers since the 2018 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, updated in 2012, and the latest revision was adopted by the Board of Commissioners on March 25, 2021. 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 Design Guidelines and Delivery Standards as well as our Shelter Placement policy is included below.

Vehicle Assignment:

The NFTA’s bus fleet is composed of several different models Bus fleet information is shown below. 100% of the NFTA big bus fleet and 100% of the NFTA light rail fleet is equipped with APC technology.

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

Figure 11 - Fixed Route Fleet Information

5/31/2024					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		
2600	2006	Gillig	G29D102N4	40'	148%	103%	17.8	514,972	2	0	4	6	0	0	6	0	0	6	2.2%
2700	2007	Gillig	G30D102N4	40'	139%	108%	16.7	537,914	0	0	11	0	11	0	0	11	0	11	4.0%
1000A	2010	Gillig	G30D102N4	40'	118%	102%	14.2	508,307	2	0	9	0	11	0	0	11	0	11	4.0%
1000B	2010	Gillig	G27D102N4	40'	113%	94%	13.6	468,192	30	1	7	37	0	0	37	0	0	37	13.5%
1000C	2010	Gillig	G27D102N4	40'	109%	97%	13.1	482,804	15	0	5	0	0	2	0	0	2	2	0.7%
1100A	2011	Gillig	G30D102N4	40'	109%	72%	13.1	377,097	24	0	0	0	24	0	0	24	0	24	8.8%
1100B	2011	Gillig	G30D102N4	40'	108%	72%	12.9	361,873	5	0	0	0	5	0	0	5	0	5	1.8%
1100C	2011	Gillig	G27D102N4	40'	109%	68%	13.0	339,391	1	0	0	0	1	0	0	1	0	1	0.4%
1200A	2012	Gillig	G30D102N4	40'	100%	74%	12.0	369,268	13	0	0	12	1	0	12	1	0	13	4.7%
1200B	2012	Gillig	G27D102N4	40'	100%	56%	12.0	278,523	1	0	0	0	1	0	0	1	0	1	0.4%
1300	2013	Gillig	G27D102N4	40'	91%	74%	10.9	368,797	0	0	0	0	0	4	0	0	4	4	1.5%
1500	2015	Nova Bus	LFS 40	40'	68%	69%	8.1	342932	0	0	0	0	0	20	0	0	20	20	7.3%
1600	2016	Nova Bus	LFS 40	40'	65%	69%	7.9	343769	0	0	0	0	0	24	0	0	24	24	8.8%
1700A	2017	Nova Bus	LFS 40	40'	65%	69%	7.0	295016	0	0	0	0	0	16	0	0	16	16	5.8%
1700B	2017	Nova Bus	LFS 40	40'	59%	38%	7.0	188336	0	0	0	0	8	0	0	8	0	8	2.9%
1800A	2018	Nova Bus	LFS 40	40'	48%	49%	5.8	246939	0	0	0	0	0	16	0	0	16	16	5.8%
1800B	2018	Nova Bus	LFS 40	40'	49%	38%	5.8	191393	0	0	0	8			8			8	2.9%
1900	2019	Nova Bus	LFS 40	40'	38%	38%	4.5	189049	0	0	0			23			23	23	8.4%
2200C	2022	New Flyer	XE40	40'	11%	5%	1.3	23718	0	0	0		10			10		10	3.6%
2200D	2022	Nova Bus	LFS 40	40'	11%	8%	1.3	40494	0	0	0	10			10			10	3.6%
2300A	2023	New Flyer	XE40	40'	4%	2%	0.5	12265	0	0	0		14			14		14	5.1%
2300B	2023	Nova Bus	LFS 40	40'	6%	3%	0.7	16334	0	0	0	10			10			10	3.6%

Figure 12 - Paratransit Fleet Information

BUS INFORMATION										SUB FLEET INFORMATION								
Fleet Designation	Year	Make	Model	Length	Lift or Ramp	Seats	Standees	WC Positions	Fuel	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 G	2010	ANNS		26					G	0%	0%	14.0	130,715	0	0	0	3	5.0%
8200 A	2012	Coach & Equip	Phoenix	22	L	8	4	3	G	236%	264%	11.8	395,725	0	0	7	7	8.8%
8200 B	2013	Coach & Equip	Phoenix	22	L	8	4	3	G	226%	247%	11.3	371,120	0	0	10	10	12.5%
8300 A	2016	Coach & Equip	Phoenix	24	L	8	4	3	CN G	165%	132%	8.3	197,325	1	0	9	10	12.5%
8200 C	2017	Coach & Equip	Phoenix	22	L	8	4	3	G	144%	192%	7.2	287,953	0	0	8	8	10.0%
8400 A	2016	New Eng Whls	Frnt Run	18	R	14	0	2	G	93%	35%	4.7	106,223	1	0	0	3	3.8%
8400 B	2017	New Eng Whls	Frnt Run	18	R	14	0	2	G	77%	35%	3.9	105,396	0	0	0	8	10.0%
8400 C	2020	New Eng Whls	Frnt Run	18	R	14	0	2	G	60%	59%	3.0	89,188	0	0	0	3	3.8%
8400 D	2021	New Eng Whls	Frnt Run	18	R	14	0	2	G	0%	0%	2.0	77,529	0	0	0	8	10.0%
8400 E	2022	New Eng Whls	Frnt Run	18	R	14	0	2	G	22%	26%	1.1	38,972	0	0	0	9	11.3%
8200D	2024	Coach & Equip	Phoenix	21	L	8	0	2	G	1%	0%	0.0	150	0	0	0	11	18.3%

 BABCOCK GARAGE
 APC DEPLOYMENT PLAN - WEEKDAY
 WEEK BEGINNING: SUNDAY AUG 29,2021

DAY OF WEEK	DATE	AM/PM BLOCKS	BLOCK	BLOCK PULL OUT	BLOCK PULL IN	NTD SAMPLE BLOCK	BUS NUMBER
MONDAY	08/30/2021	AM					
			19002	446	1235		_____
			16002	452	1306	YES	_____
			19005	508	1228		_____
			15003	516	1322		_____
			46001	603	845		_____
			42001	605	1036		_____
			4005	631	904		_____
			14007	703	1140	YES	_____
			15006	730	1157		_____
			46002	911	1154		_____
			15007	1113	1615		_____
			6006	1139	1706		_____
			42003	1140	1909		_____
		PM					
			6008	1208	2004		_____
			4007	1212	1545		_____
			14010	1213	2005	YES	_____
			6009	1218	2006		_____
			19011	1226	1535		_____
			14011	1233	1740		_____
			2006	1245	1459		_____
			76003	1255	2020		_____
			32015	1321	1645		_____
			1005	1324	1730		_____
			74003	1601	1737		_____
			69001	1620	1751		_____
			15011	1620	2506		_____
BLOCKS:			26				

Please Return To Eric Svenson / Service Planning

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. Shelter requests can be made by members of the public on the NFTA Metro website, which are reviewed based on the shelter placement policy criteria; this request form is also included.

Benches:

NFTA typically places benches at locations with shelters, but will place benches in areas where space limitations prevent a shelter from being installed. NFTA will review all requests from the public for bus stop benches. Benches are also placed at each rail station.

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. NFTA Metro publicly produces static General Transit Feed Specification (GTFS) data, which allows customers to plan trips on various apps (Google Maps, Transit, Moovit) using the latest schedule information. Real-time bus information is provided through GTFS-Realtime feed that is also available through the above apps. Seventeen digital signs provide real-time and scheduled data at select rail stations, transit centers and bus stops. Riders can visit the website to sign up for email alerts about trip status, reroutes and other important information about their routes.

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. Up-to-date information about the status of escalators and elevators is available on the NFTA Metro website.

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 years and is updated annually. The plan 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. Access to critical NFTA facilities is protected and monitored utilizing access control means such as physical keys, intrusion alarms, and card readers.

The NFTA has conducted Terrorism Awareness training for our front-line employees beginning in 1998. Supplemental trainings have included training in Behavioral Awareness, Improvised Explosive Devices, Identifying and Reporting Suspicious Behaviors, and other security topics. NFTA staff has additionally been trained in active shooter response tactics during this time period.

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. System and facility familiarization training has been provided to local responding agencies and drills are planned to further test those agencies' response mechanisms. 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).

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 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 boardings 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 Shelter Placement Policy:

- The policy for placement of new shelters is as follows:
 - A points 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 shelter placement.
- Points are accumulated according to the following criteria:

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

10 points Number of daily boardings is **between 100-199 people** per day.

7 points Number of daily boardings is **between 50-99 people** per day.

4 points Number of daily boardings is **between 10-49 people** per day.

- 4 points **Transfer point** – Where passengers wait to board one bus after alighting from another.
- 4 points **Special needs** – Area includes 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 location** – Includes 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 40mph or more.
- 2 points **Long waiting time** – Stops at which customers wait 30 minutes or more 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 improvements** – 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.
- **Metro Service Planning will prepare a list of proposed new shelter locations** meeting the adopted placement criteria.
- **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.

- **NFTA Health Safety & Environmental Quality will complete the required environmental review** for proposed new shelter locations.
- **Metro 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 continue to pursue the installation of additional shelters through an Adopt-A-Shelter program**, taking advantage of public/private partnerships.

Figure 14 – Online Shelter Request Form

Shelter Request

Consent for storing submitted data *

Yes, I give permission to store and process my data

Name *

Phone number *

Email address *

Street On *

Cross street *

Direction of travel *

What direction is the bus traveling? Eg. inbound, outbound, towards University Station, towards Abbott Bailey Loop, etc.

Stop ID

If you know the Stop ID of the bus stop, please enter it. The Stop ID is the 4-5 digit number in the bottom corner of the bus stop sign.

Routes

Explanation *

Please briefly explain your shelter request.

Please briefly explain your shelter request.

Are you submitting this shelter request on behalf of a business/organization? *

Yes

No

Submit

Service Design Guidelines & Delivery Standards, 2021 Revision

Service Design Guidelines & Delivery Standards

2021 Revision



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Executive Summary

NFTA Metro's Service Design Guidelines and Delivery Standards, approved by the NFTA Board of Commissioners on March 25, 2021, provides a framework for transit network design and operation. This framework is derived from a commitment to NFTA Metro's mission and vision for regional coordination and enhanced quality of life through the application of public transportation.

This document has four main sections:

- The **Introduction** defines the service area and establishes service tiers for transit operation, separating the most important core services from the supporting services. A quick guide to understanding the document is included in this section.
- **Service Design Guidelines** establish general principles to guide staff in designing new and existing routes. For example, bus routes should be simple and direct; bus stop spacing should be context sensitive; and shelters, pedestrian connectivity, and bicycle infrastructure are crucial elements of a successful transit network. Equity is an important consideration in route design, and NFTA Metro's five-factor Transit Need Index provides a framework for evaluating the equitable distribution of service to the communities with the highest need for public transportation accessibility. Service design guidelines provide an aspiration for the transit service NFTA Metro should provide
- **Service Delivery Standards** establish the framework for determining service tiers and define evaluation metrics and other aspects of service operation. This section explains operational standards such as service hours of operation, frequency, defined peak and off-peak time periods, service productivity and capacity of transit vehicles. Some of these standards are delineated by service tier, while others are universal systemwide.
- In **Service Evaluation Process**, a procedure is established for how each service route is evaluated, and how service is changed. The evaluation is a six-step process that uses route and aggregate service tier statistics to determine performance. Low or high performance may lead to changes to operations or modification of service tier. Significant changes require the nine-step service change process, which has public outreach and board approval requirements.

After the major sections, there are **Frequently Asked Questions** (FAQs) that may answer common queries the reader may have about NFTA Metro service planning and operation.

This document has been written to be readable by the public while being applied internally. For any transit terminology that may not be familiar to the reader, a glossary of transit terms has been included in the **Appendix**.

1. Introduction

1.1 Background

What is NFTA Metro?

Niagara Frontier Transit Metro System, Inc. (**NFTA Metro**) is the state-granted public authority that coordinates and operates surface public transportation (also known as transit, or public transit) for the counties of Erie and Niagara in western New York state. NFTA Metro manages and operates Metro Bus, Metro Rail, and PAL (Paratransit Access Line) services for the community.

NFTA Metro is a division of the Niagara Frontier Transportation Authority (NFTA) that is responsible for air and surface transportation in Erie and Niagara counties.

What are service design guidelines and delivery standards?

Service design guidelines and delivery standards are policies adopted by NFTA Metro to 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 or reduction of current service. The NFTA Board of Commissioners (hereafter “NFTA Board”) initially approved service standards in 1992, reaffirmed them again in 1995 and revised them last in 2012. This document contains service design guidelines and delivery standards based on current best practices of the transit industry and the conditions of the Buffalo-Niagara region’s transportation needs.

Why do we establish service standards?

Service standards allow NFTA Metro to meet key principles and framework that reflect the mission and vision of NFTA Metro.

Mission

Enhance the quality of life of residents and visitors by providing the highest level of safe, clean, affordable, responsive, and reliable public transportation through a coordinated and convenient bus and rail system.

Vision

Support the effective coordination and partnership with public and private entities in continuously improving transportation services to promote regional growth.



1.2 Service Overview

Service area

The service area of NFTA Metro is defined as Erie and Niagara Counties in New York State, including the Cities of Buffalo, Niagara Falls, Lackawanna, North Tonawanda, Lockport and Tonawanda.

Service tier definitions and standards

Metro Rail and Metro Bus are transit services provided by NFTA Metro. It is important to distinguish between the various existing and planned services to allow for the prioritization of service to areas of high ridership while allowing appropriate geographic connectivity.

SERVICE TIERS

CORE SERVICES

Tiers most important to maintaining regional transportation ridership and connectivity

METRO RAIL



A light rail line that operates in conjunction with the bus transit network

BUS RAPID TRANSIT



A high quality bus system that delivers fast, frequent, and high capacity service

FREQUENT



A primary route in a high-density municipality that has the highest ridership and demand

STANDARD



A route used to improve transit coverage in areas not serviced by frequent bus service, the objective of this service is to connect riders to frequent and higher levels of service

SUPPORTING SERVICES

Tiers that benefit regional transportation connectivity and efficiency

LIMITED STOP



A route variant that only services selected stops to reduce travel time for through-riding customers

SUBURBAN EXPRESS



A rush-hour bus route that serves downtown Buffalo to/from suburban park-and-rides or activity centers using highways

LOCAL EXPRESS



A faster variant of an existing bus route that follows the local route until near the City border, then uses highways to access downtown Buffalo

ON-DEMAND MICRO TRANSIT



A ride-hailing type of service that operates to increase coverage in an area not serviced by traditional fixed-route service

TROLLEY



A seasonal bus route that provides service as a circulator to promote connectivity of tourist destinations and hotel lodgings

1.3 Understanding this document

This document is written with the intent of informing internal entities, as well as educating the public. NFTA Metro will abide by the guidelines and standards set forth in this document to provide the necessary transportation service of the Buffalo-Niagara region. Members of the community and customers can understand the necessary steps taken to decide how service is provided by NFTA Metro by reading this document.

There are three major sections of this document: **Service Design Guidelines**, **Service Delivery Standards** and **Service Evaluation Process**.

Service Design Guidelines are general best practices for how the design of the transit network should look.

Service Delivery Standards provide a framework that is used to establish service tiers and performance metrics used to evaluate its operation of service.

The **Service Evaluation Process** is the procedure by which service performance metrics are measured, evaluated, and used to inform service planning decisions at NFTA Metro.

The last section of the document includes **Frequently Asked Questions**. These are common queries that NFTA Metro staff receive about the services provided.

Within this document are references to terms that may be unfamiliar to some readers. **Appendix A** is a glossary of terms that is used in this document and others released by NFTA Metro.

Up-to-date yearly analysis of the Transit Need Index and classification of service tiers can be found in the **Appendix**.

Other documents, laws or policies may be referenced in this document. These are colored and bolded for readers and look like this: **Referenced Document**. If the document is by NFTA Metro, it can be found on our website: <https://www.nfta.com/about/public-information>

NFTA Metro can be further contacted with any questions or comments.

Email us at info@nfta.com or visit our website.

2. Service Design Guidelines

2.1 What are service design guidelines?

Service design guidelines establish general principles to guide staff in how new and existing routes are designed. Additionally, transit supportive facilities, geographic coverage and equity factors are considered for route planning. Service design guidelines are not rigid standards and provide room for flexibility as much as funding and geographical contexts may allow. Service design guidelines provide an aspiration for the transit service NFTA Metro should provide.



2.2 Route design

Simple routes

Routes should be designed in an easy-to-understand and consistent way. Customers should be able to tell where the route goes. As much as is feasible, routes should remain on major arterials with good pedestrian connectivity. Routes should be designed to connect major activity centers.

Direct routes

Routes should be designed directly to and from major destinations without straying from major arterials to minimize passenger travel time.

Symmetrical routes

Routes should be designed to operate in an easy-to-understand and symmetrical pattern, servicing the same corridors in both directions.

Variations

When a route serving an area has the same start point but deviates course along its journey to serve other areas, this is known as a **variation**. Routes should not have more than 2 variations to allow for an easy-to-understand route network.

Coverage (transit access)

Fixed-route transit should be designed to serve areas with density, walkability, continuity, and linear routing. Some routes are designed for geographic service coverage and may not serve dense/walkable areas due to established car-centric land use and development but are necessary to maintain regional connectivity. The conflict between serving areas with high transit propensity and serving more land area is continual and can be the reason for routes operating in less dense areas.

Multimodal connections

Whenever possible, NFTA Metro routes should serve to connect multimodal forms of transportation.

This may include but is not limited to airports, train stations, intercity bus services, light rail, commuter rail, park-and-ride lots, car-share, and vanpool.

NFTA Metro routes should also serve key pedestrian areas and provide sufficient connection to bicycle facilities, bikeshare and other micro-mobility forms that can provide accessible means for first/last mile trips.

ROUTE DESIGN

DENSITY

Areas with more people going to and coming from destinations located near stops.



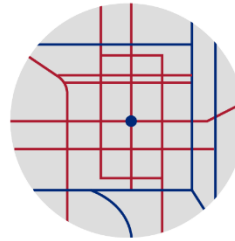
HIGH RIDERSHIP



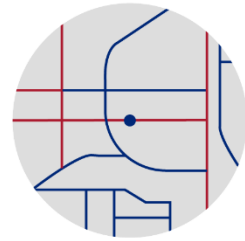
LOW RIDERSHIP

WALKABILITY

Areas with more sidewalks, safer street crossings, and a connected street grid.



HIGH RIDERSHIP



LOW RIDERSHIP

CONTINUITY

Routes that avoid traveling through long gaps of low-density development.



HIGH RIDERSHIP



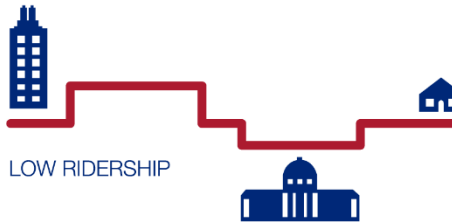
LOW RIDERSHIP

LINEARITY

Routes that run frequently and in straight lines with few deviations.



HIGH RIDERSHIP



LOW RIDERSHIP

Graphic Adapted from IndyGo (Indianapolis, IN)

2.3 Bus stops

Spacing

In most cases, NFTA Metro determines stop spacing by geography. Downtown Buffalo is the most dense, walkable, and accessible district of the service area. It also experiences the most traffic congestion, traffic lights, and highest number of transit transfers. For these reasons, stop spacing can be spread out to allow for riders to utilize alternative forms of transportation within Downtown, while also maintaining accessibility and efficiency of transit vehicles.

Higher-Density neighborhoods contain the most transit riders and have the highest residential density in the area. These areas are often served by more frequent bus routes that must maintain speed and time efficiency for transit to remain a viable transportation option. Higher-density municipalities have higher walkability and accessibility than lower-density municipalities. Therefore, they have less stops per mile than routes in less dense areas due to more potential for delay. Less stops allows the bus to move quickly through traffic at reliable time intervals.

In the outer-ring suburbs and rural areas of the service area, there are fewer riders and infrastructure is lacking for pedestrians. Because of these contextual features, it is important to be able to get as close to the destination as possible, requiring the highest stops per mile. However, speed efficiency is not lost due to a lower rate of ridership at these stops. The additional stops do not slow the buses and riders' time on-vehicle is not significantly affected.

Geographic Context Dependent Service	Suggested Average Spacing (stops per mile)
Downtown Buffalo	1,200 ft (4)
Higher-Density Municipality	950 ft (5)
Lower-Density Municipality	700 ft (7)
<i>Independent Services*</i>	
<i>Bus Rapid Transit</i>	$\frac{3}{4}$ mile (1-2)
<i>Limited Stop</i>	$\frac{3}{4}$ mile (1-2)
<i>Suburban Express</i>	Case-by-case
<i>Local Express</i>	Case-by-case

**Independent services are not geographically contextual in all cases and may have wider average stop spacing due to the nature of the service, despite their locations*

Downtown Buffalo is defined as Goodell St/Edward St in the north, Michigan Ave in the East, Elmwood Ave/Lower Terrace in the West, the Buffalo River and South Park Ave in the South.

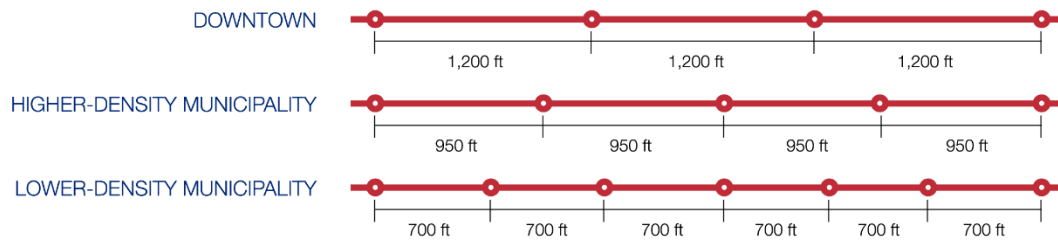
Higher-Density Municipality is defined as a municipality outside of Downtown Buffalo (see above) with significant population density (greater than 1,000 people per sq. mile), including some first-ring suburbs.

Lower-Density Municipality is defined as anywhere in Erie or Niagara County not found in the above geographies and/or has population density less than 1,000 per sq. mile.

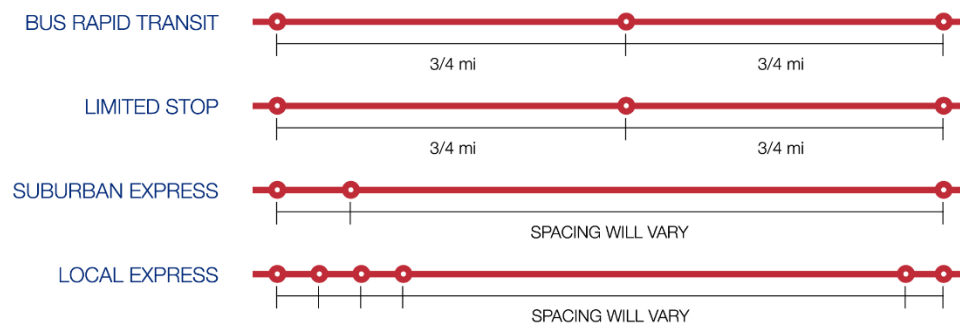
BUS STOP SPACING

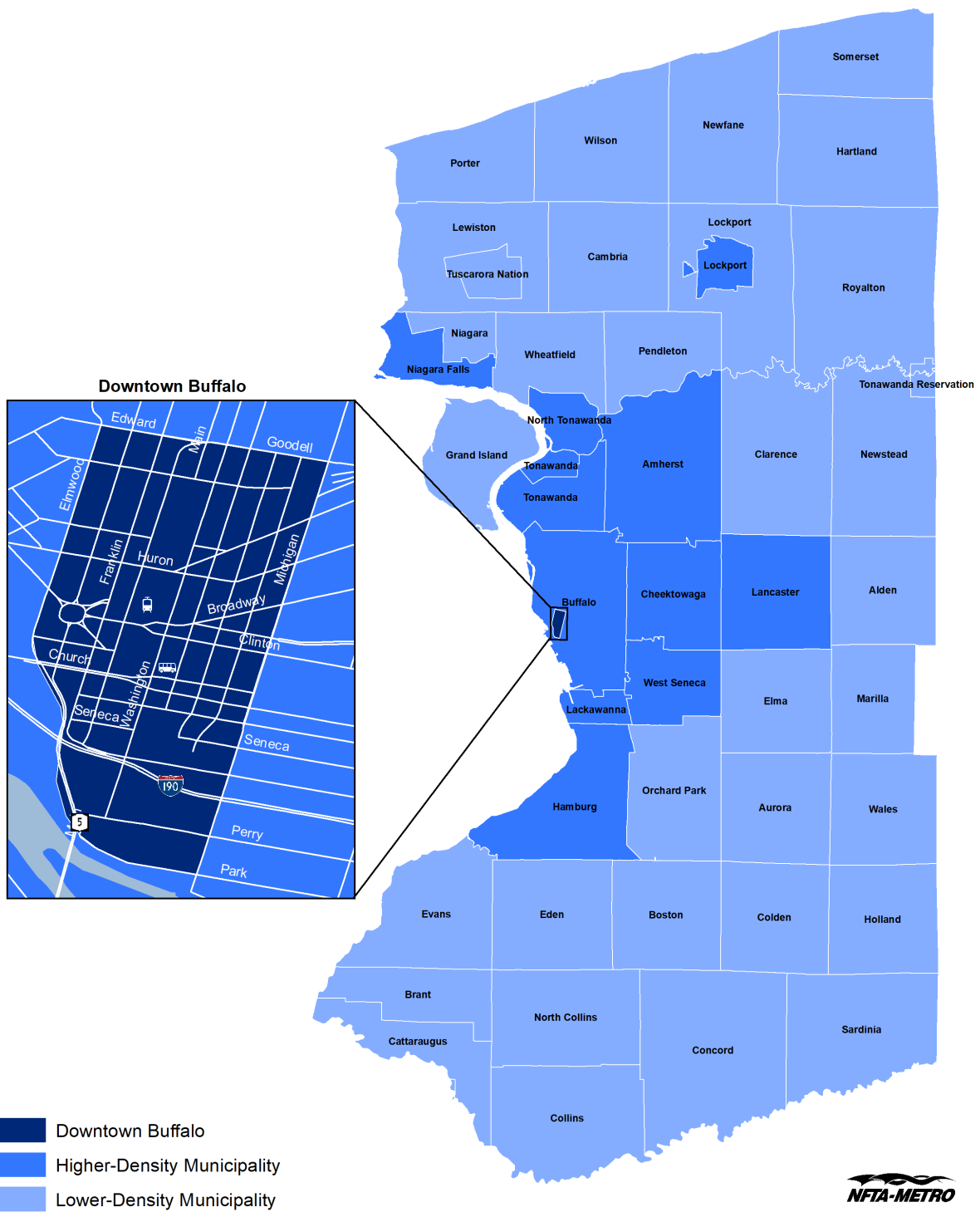
DISTANCE BETWEEN STOPS

GEOGRAPHIC CONTEXT DEPENDENT SERVICE



INDEPENDENT SERVICES





Bus stop design

Symmetrical location

Bus stops for inbound and outbound directions should be located within a visible and short walking distance of each other to ensure buses are serving the same geographic area both ways.

Pedestrian accessibility

Whenever possible, bus stops should be located on the curb of an ADA-accessible sidewalk. Bus stops should be supportive of pedestrian networks. They should be visible and accessible from both sides of the street.

Bus bulbs and boarding islands

Bus bulbs are curb extensions that align the bus stop with the outside of the parking lane. They help with the efficiency of the bus merging in and out of traffic and provide a visible cue for community members to board the bus. Bus bulbs can be at corners or mid-block.

Boarding islands are like bus bulbs but are separated by the sidewalk by a bicycle lane. Both infrastructure designs allow for a streamlined transit service with in-lane stops.

Bus bulbs and boarding islands should be in conjunction with high ridership stops on frequent routes.

Resurfacing, restriping, and road reconstruction projects provide key opportunities to incorporate transit safety and efficiency improvements into the streetscape. Ongoing coordination between transit agencies and City, State, and County departments of transportation is crucial.

Where to stop?

Buses can stop to the side of the street (pull-out stop) or in the travel lane (in-lane stop). The most appropriate place to stop depends on road geometry, local traffic situations and space. Passenger safety is always the first and most important consideration for where the bus will stop given its local context.

Pull-out stops

Pull-out stops have little impact on traffic if there is enough room for the bus to pull over completely. Often this is into the parking lane that is reserved for the bus to stop in. This is not compatible with bus bulbs or boarding islands. This allows the bus to come close to the pedestrian space for accessibility and safety.

In-lane stops

With an in-lane stop, the bus stops in the travel lane to let passengers off. This is preferable with bus bulbs and boarding islands. Otherwise, pull-out stops (see above) can be preferable to get riders closer to the pedestrian infrastructure.

Far-side stops

Far-side stops are where the bus stops after an intersection.

Near-side stops

Near-side stops are where the bus stops before an intersection.

Mid-block stops

Mid-block stops are where the bus stops in the middle of a block and not near an intersection.

Signalized and four-way stop intersections

Bus stops should be located after a signalized intersection (**far-side**) whenever possible. This makes for safer boarding and alighting for passengers and is more efficient.

Two-way stop intersections

Bus stops should be located before/at the stop sign (**near-side**) for two-way stops whenever possible.

Roundabouts

Bus stops should not be located within the travel lane of a roundabout whenever possible.

Transit supportive facilities

Transit centers

Transit centers are locations where multiple bus routes meet to provide a vital connection point for transferring between lines or modes. These should provide riders with a safe, well-lit, and comfortable climate-controlled place to wait and purchase fares. They should provide bicycle parking. Transit centers should allow for the transfer to bicycle, bike-share, and other alternative mode transportation, as well as great pedestrian access.

In the NFTA Metro transit network, primary transit centers are located at the Metropolitan Transportation Center in downtown Buffalo, as well as the Niagara Falls Transportation Center and Portage Road Transportation Center in Niagara Falls. Many of the Metro Rail stations also serve as transit centers, notably University Station, which has connections to eleven (11) bus routes.

Transit hubs

Transit hubs are locations where multiple bus routes meet to provide a vital connection point for bus transfers. Transit supportive entities should be available at transit hubs, such as shelters, benches, digital schedule signage or heating elements. They should provide bicycle parking. Transit centers should allow for the transfer to bicycle, bike-share, and other alternative mode transportation, as well as great pedestrian access.

Black Rock Riverside Transit Hub is an example of a transit hub in the NFTA Metro transit network.

Park-and-rides

Park-and-rides are designed to promote transit use for people living outside of the central city by allowing riders to drive or get dropped off to nearby lots to then ride transit. They may not be served by transit where they live, but this allows riders to utilize the cost-saving benefits of transit.

Park-and-ride lots should be well-lit with streetlights and have a place for riders to wait (shelter or bench). Park-and-ride lots should be clearly identified.

NFTA Metro operates numerous park-and-ride lots across the service area. Suburban Express and Local Express routes should serve these lots.

Transit supportive entities

Shelters

Bus shelters are important for customer comfort and safety, as they provide protection from the elements for passengers waiting to utilize the bus. There are currently 4,500 bus stops in the NFTA Metro network, with 250 shelters. Five percent of boarding locations within the network are served by a shelter.

NFTA Metro is committed to providing a comfortable experience and seeks to add additional shelters to provide better facilities to align more closely with peer agencies.

Large transit shelters should be provided at the highest ridership stops, whereas standard sized shelters are appropriate for less heavily utilized stops.



Bus shelters require significant capital and operating costs and are approved on a case-by-case basis. Providing shelters benefits current ridership, attracts new ridership and provides marketing and branding opportunities.

When adding new shelters, there are considerations that are measured when determining proper location. These include:

- Ridership (how many people board the bus in a location)
- Feasibility (space available for a shelter)
- Potential impact to adjacent properties (neighboring property owners' concerns)
- Visibility (whether the shelter can be seen by operators, vehicles and pedestrians; marketing opportunities)
- Geographic dispersion (distribution of shelters among bus routes and municipalities in the region, contributing to an equitable distribution)

NFTA Metro works with developers and other entities. Shelters provided by other parties may not be maintained by NFTA Metro or look similar to NFTA Metro's base shelter and are provided as a convenience.

Shelters are not permanent and may be moved at the discretion of NFTA Metro. Shelters at underperforming stops should be moved to better serve the highest ridership in the NFTA Metro transit network.

Seating

Seating at bus stops is provided by NFTA Metro and others with permission by owners of the right-of-way for the comfort and convenience of riders. It may be located in conjunction with a shelter, or unprotected. High ridership stops are good candidates for seating provided by NFTA Metro.

NFTA Metro works with its partners in municipalities and landowners to provide this convenience for the riding public.

Bicycle facilities

Bicycling can be used to complement and supplement transit services. Bicycling and transit support an affordable, equitable, sustainable, low-impact and community-friendly transportation journey. NFTA Metro strives to increase bicycle facilities to stops and transit supportive facilities.

All NFTA Metro buses have bike racks that can accommodate two bicycles on the front of the vehicle. Riders are permitted to bring bikes onto Metro Rail as well.

Bicycle parking in the form of permanent and secure bike racks should be provided at all transit centers, hubs, park-and-rides, and high ridership stops that contain a shelter and/or a bench.

NFTA Metro works with local municipalities, transportation agencies, bike-share companies, bike advocacy groups, landowners, and the community at-large to provide bicycle parking.

Signage

All NFTA Metro stops should display a sign showing the routes served and identify the Stop ID for wayfinding.

Other signage that may be seen at NFTA Metro stops includes digital real-time signage, informational signage, route change notices, and paid advertisement.

Wi-Fi

Wi-Fi is provided as a courtesy at some transit centers and on NFTA Metro buses. NFTA Metro is working to improve Wi-Fi access within the NFTA Metro network.

Real-time information

NFTA Metro is committed to keeping riders informed and connected with real-time information. NFTA Metro has chosen to integrate GTFS-R, an industry-standard real-time data format, into its operations.

GTFS-R allows for third-party developers to consume data distributed by NFTA Metro to inform riders of service changes, live bus locations and expected times of arrival adjusted to traffic conditions. Third-party developers typically integrate the data with trip planning to provide riders with a cohesive transit experience.



Riders can utilize some of the free applications listed at <http://metro.nfta.com>.

2.4 Infrastructure design

Pedestrian connectivity

NFTA Metro supports pedestrian connectivity to its transit centers, hubs, and stops. Whenever possible, roadway modifications to corridors with NFTA Metro routes should enhance pedestrian connectivity and safety. Coordination with municipalities and local transportation departments should encourage the development of a complete pedestrian network to link to transit.

Dedicated transit lanes and transitways

Dedicated transit lanes provide exclusive access for transit vehicles for either portions of the day, or full time. These provide transit vehicles with a clear path outside of most vehicular traffic and are often combined with stop infrastructure like bus bulbs or boarding islands. They are most effective in areas with high traffic delays and significant curbside activity. Dedicated transit lanes can be located along the curb, between travel lanes and a parking lane, or in the center of the street.

In some cases, exclusive transit-vehicle roads are needed. This is called a transitway. Vehicular traffic is physically separated from transit vehicles, which have exclusive use and are protected.

Dedicated transit lanes and transitways are integral to providing light rail, and bus rapid transit (BRT) service in urban areas. They also can improve efficiency of frequent bus service in congested areas.

NFTA Metro should work with local municipalities, and state and county departments of transportation to establish dedicated transit lane infrastructure for all modes and explore transitway options for future modes.

Transit lanes and transitways should be differentiated visually by using road paint. Bus lanes should be red, whereas bike lanes should be painted green. This should follow NYSDOT and USDOT guidelines and regulations.

Active transit signal priority (TSP)

Transit Signal Priority (TSP) modifies traffic signal timing or phasing when transit vehicles are present. This is done either conditionally for a late vehicle (where the light is held to allow the vehicle to catch up), or unconditionally where the signal will change upon any approaching transit vehicle. These are used to increase reliability and decrease travel time on implemented corridors. TSP is frequently combined with dedicated transit lanes for further efficiency.

Queue jump lanes

Queue jump lanes provide preference for buses at intersections, giving the bus a “head start” over other traffic. This combines active signal priority with bus lanes, where a bus will be given a green light to “jump” ahead of the vehicular traffic at the traffic light, allowing the bus to be in front of traffic. This technique reduces delay and is used in Bus Rapid Transit designs.

2.5 Essential considerations

Equity statement

NFTA acknowledges that transportation and mobility are connected to opportunity in the Buffalo-Niagara region. We are committed to providing public transit service that maximizes opportunity. We recognize that different neighborhoods have differing transit needs that are tied to income, poverty status, race/ethnicity, and automobile access.

This document guides staff in designing and evaluating transit service, as well as transit supportive infrastructure such as shelters and benches. One strategy NFTA Metro will use to hold itself accountable for how service changes affect the most vulnerable members of our community is to adopt a Transit Need Index within an equity framework, described below. This index will allow staff to understand how proposed changes may affect neighborhoods with a high transit need who may be most impacted (either positively or negatively) by service changes.

As a regional transportation leader, NFTA Metro will continue to work with partner agencies and local leadership to promote equity and opportunities for our community.

Accessible inclusion

NFTA Metro serves a diverse population with different transportation needs. It commits to ensuring accessibility is among the most important factors when determining how the transit network is designed. Design should be accessible, inclusive, universal, and promote safety. The transit network should be understandable by members of the community regardless of age or ability.



Title VI program

NFTA Metro is committed to following the provisions established by **Title VI of the Civil Rights Act of 1964** (42 U.S.C. 2000d et seq.). Title VI prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance, including the Federal Transit Administration (FTA). NFTA Metro submits a compliance report every three years as outlined by FTA regulations.

Public participation

NFTA Metro welcomes community input on its service and operation. NFTA Metro has adopted a blueprint for how the public can engage with staff and provide input to influence service modifications. NFTA Metro promotes the active engagement of traditionally underrepresented populations.

Americans with Disabilities Act (ADA)

All Metro bus and rail facilities and vehicles must be in compliance with the Americans with Disabilities Act (ADA) design standards.

Transit Need Index

NFTA Metro has developed a five-factor Transit Need Index based on demographic and employment information in accordance with industry best practices. The resulting maps highlight differing transit needs throughout Erie and Niagara Counties.

Data for the Transit Need Index is sourced from the United States Census Bureau American Community Survey (ACS) (using 5 year estimates) and Longitudinal Employer-Household Dynamics (LEHD) Origin-Destination Employment Statistics (LODES) on the block group level for Erie and Niagara Counties.

All data is sorted into quartiles, with each quartile representing 25% of census block groups. Quartiles are assigned values 1 through 4, depending on how that value indicates higher transit need. Block groups scoring a 4 have the most significant need for transit based on the demographic data.

The indexes for the five factors are then added up and again displayed in quartiles, representing Low, Medium-Low, Medium-High, or High Transit Need.

The Transit Need Index will be updated on an annual basis.

Origin data

Four demographic indexes are created using origin data, or data that tells where people who need transit are living.

Median Income Index

Median income is the middle-income value within the population of the block group. Lower median incomes indicate people who are more likely to need and utilize transit as a form of transportation.

This data is the only set that does not take density into account. This is because median is already a normalized value.

The 25% of block groups with the lowest median income are given a score of 4, while the highest are given a score of 1.

Minority (All but White-alone) Population Density Index

Racial and ethnic minorities are more likely to utilize transit in Erie and Niagara counties due to historical issues of segregation and suburbanization.

This factor utilizes block group minority population (all races/ethnicities that are not White-alone) and normalizes the data by the area of the block group in square miles. This allows NFTA Metro to identify concentrations of minority populations.

The 25% of block groups with the highest density of minority populations are given a score of 4, while the lowest are given a score of 1.

Economically Disadvantaged Households Density Index

Households that are at or below the federal poverty level for the Buffalo-Niagara region are “economically disadvantaged” and are more likely to require transit as a form of essential transportation.

This factor utilizes data for the number of households that falls at or below the federal poverty level, and then is normalized by the area of the block group in square miles to allow for staff to identify concentrations of disadvantaged residents.

The 25% of block groups with the highest disadvantaged households are given a score of 4, while the lowest are given a score of 1.

Zero Car Households Density Index

Households without access to an automobile are more likely to require transit as a form of essential transportation.

This factor utilizes data for the number of households without access to an automobile and is normalized by the area of the block group in square miles. This allows NFTA Metro staff to identify areas of concentrated households without access to a vehicle.

The 25% of block groups with the highest density of zero car households are given a score of 4, while the lowest are given a score of 1.

Destination data

One demographic index uses destination data, or common destinations for people who need transit.

Low Income Jobs Density Index

Residents who work low-income jobs are more likely to require transit to get to their place of employment. Low income jobs are jobs that pay \$1,250 a month or less according to the U.S. Census Bureau.

The data is combined at the block group level and normalized by area in square miles.

The 25% of block groups with the highest density of low-income jobs are given a score of 4, while the lowest are given a score of 1.

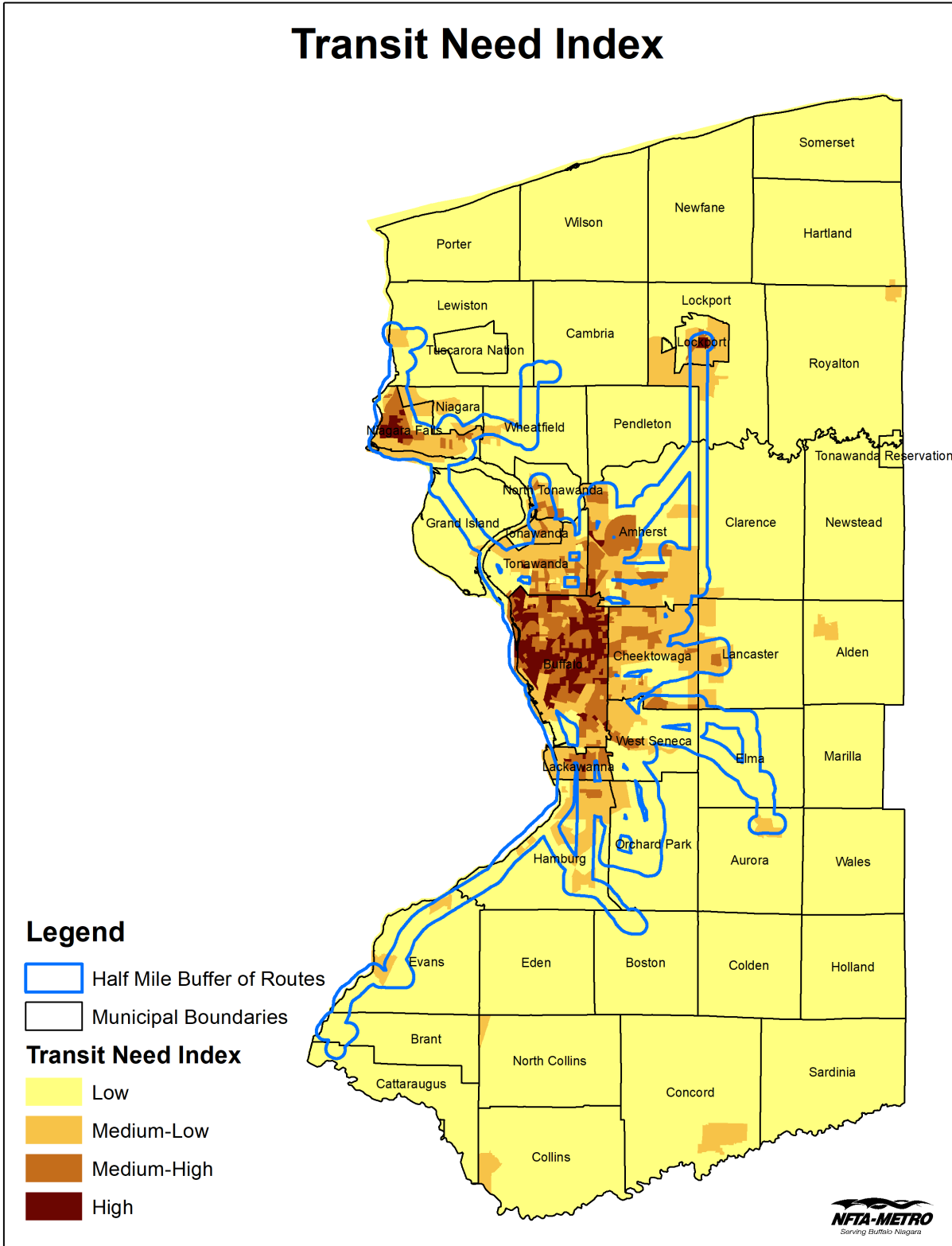
Finalized Transit Need Index

For all block groups, the total of each of the values scored for the five index factors are combined. The combined values are divided again into quartiles, representing roughly 25% of block groups each.

The 25% of block groups with the highest total values are considered "High Transit Need." The 25% of block groups with the lowest points are considered "Low Transit Need," with the middle 50% divided evenly into "Medium-Low" and "Medium-High" needs.

The appendix of this document contains the most recent complete Transit Need Index analysis.

Transit Need Index



2021 Transit Need Index Map

3. Service Delivery Standards

3.1 What are service delivery standards?

Service delivery standards provide a framework for establishing service tiers and defining metrics used to evaluate service performance. Service tier assignments are based on route performance, best practice and financial constraints.



3.2 Service hours/Span of service

What is it?

Service hours refer to the timespan and number of hours that NFTA Metro is operating vehicles across its various tiers.

Why is it important?

Service hours affect NFTA Metro’s availability to the rider. A longer span of service, with more service hours operated will allow the riding public to access transportation in more flexible ways. NFTA Metro must balance service availability with demand, while managing the cost of operation and maintenance of vehicles and facilities.



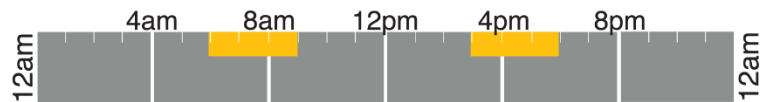
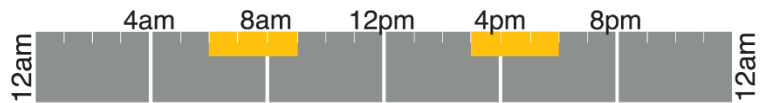
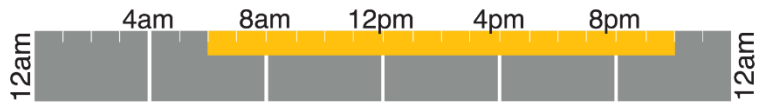
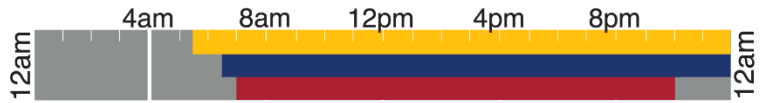
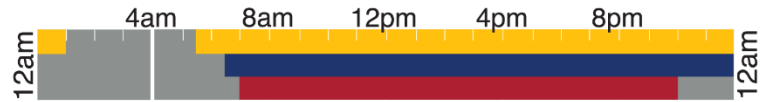
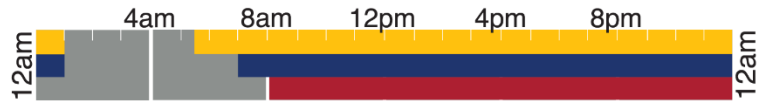
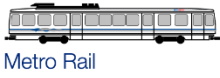
What can riders expect?

NFTA Metro operates service year-round, seven days a week, and up to 19 hours a day. Service hours may vary between and among service tiers, and route to route. By maintaining service span, NFTA Metro can be responsive to needs of transit dependent.

Ridership demand may determine a slightly altered service span on an individual route level.

<i>Service Tier</i>	<i>Weekday</i>	<i>Saturday</i>	<i>Sunday</i>
Metro Rail	5:30 AM – 1:00 AM	7:00 AM – 1:00 AM	8:00 AM – 12:00 AM
Bus Rapid Transit	5:30 AM – 1:00 AM	7:00 AM – 1:00 AM	8:00 AM – 12:00 AM
Frequent	5:30 AM – 1:00 AM	6:30 AM – 12:00 AM	7:00 AM – 10:00 PM
Standard	5:30 AM – 12:00 AM	6:30 AM – 12:00 AM	7:00 AM – 10:00 PM
Limited Stop	6:00 AM – 10:00 PM	None	None
Suburban Express	6:30 AM – 9:00 AM 4:00 PM – 6:30 PM	None	None
Local Express	6:30 AM – 9:00 AM 4:00 PM – 6:30 PM	None	None
On-Demand Microtransit	5:30 AM – 12:00 AM	TBD	TBD
Trolley (seasonal)	TBD	TBD	TBD

SERVICE SPAN



Graphic Adapted from MARTA (Atlanta, GA)

3.3 Service frequency

What is it?

Service frequency is the number of vehicles on a route within a time period, such as buses (or trips) per hour.

Why is it important?

Service frequency can determine how NFTA Metro customers use transit service, and how long they have to wait at stops and stations. Frequent routes allow riders to access transit without much need for planning ahead, adding flexibility and less door-to-door travel time. Less frequent routes may require riders to plan more to ride and wait longer for transfers.

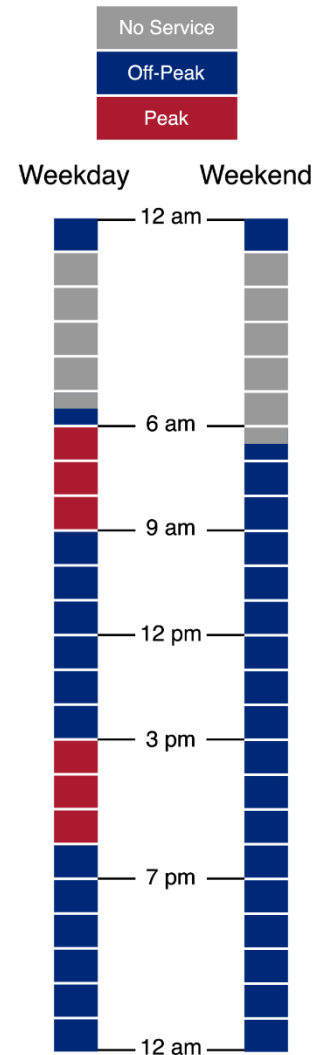
What can riders expect?

NFTA Metro provides transit service that balances regular, high-ridership service with routes designed to provide access to activity and job centers, medical services, educational facilities, and other key destinations throughout the Buffalo-Niagara area. For some routes, higher frequencies are offered during peak times to accommodate periods of high ridership, compared to nights and weekends.

Peak Hours are the hours that NFTA Metro experiences the highest demand for service and ridership. This is between 6:00 AM to 9:00 AM in the morning, and 3:00 PM to 6:00 PM in the evening. During these times, NFTA Metro provides frequent service to meet passenger demand.

Off-Peak Hours are those hours outside of the peak hours. NFTA Metro continues to provide service, however buses may not come as frequently because of lower ridership and demand at those times.

PEAK SERVICE HOURS



Graphic Adapted from MARTA (Atlanta, GA)

Ridership is a major factor in determining frequency for a particular route and service tier. High-ridership routes, like Metro Rail, Bus Rapid Transit and Frequent tiers will see the most frequent service in NFTA Metro’s network. Adjusting service frequency can be a useful tool for NFTA Metro to address other standards, and to reallocate service.

TRIPS PER HOUR (OFF PEAK)

BUSES PER HOUR

METRO RAIL every 15 minutes



BUS RAPID TRANSIT every 15 minutes



FREQUENT every 20 minutes



STANDARD every 60 minutes



Service Frequency Standards (headways)

<i>Core Service Tier</i>	<i>Peak</i>	<i>Off-Peak</i>
Metro Rail	10-12 min	15-20 min
Bus Rapid Transit	10-12 min	15-20 min
Frequent	10-15 min	20-30 min
Standard	30 min	60 min

3.4 On-time performance and service reliability

What is it?

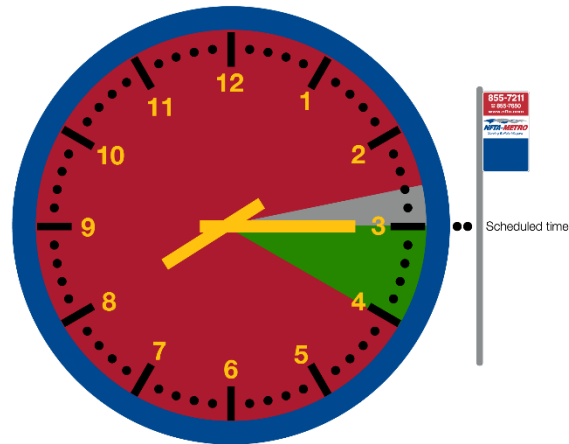
On-time performance is a measure of how frequently a transit vehicle arrives to its scheduled timepoints within the acceptable window of time.

NFTA Metro considers a service to be “on-time” if it departs from its scheduled stop up to two (2) minutes early, or up to five (5) minutes late from the designated time. Service reliability ensures that trips that are scheduled are serviced.

WHAT NFTA-METRO CONSIDERS “ON-TIME”

Why is it important?

On-time performance gives NFTA Metro riders confidence in transit reliability and in accordance with published timetables. This is especially important for routes with less service frequency. Lower on-time performance can cause significant delay in riders’ travel time and disrupt the daily schedule. Late transit service can cause riders to wait longer than expected outdoors, which can be most impactful in the winter months. It is important for NFTA Metro to provide the trips that it has scheduled.



What can riders expect?

Every effort will be made to ensure that all NFTA Metro vehicles operate on-time.

- To be in compliance with NFTA Metro’s service standards, 84% of transit vehicles must depart from a time point within the on-time range, or **higher than the previous year’s average on-time performance by service tier.**

NFTA Metro very rarely misses scheduled trips due to mechanical problems, or shortage of drivers or vehicles. System service cuts are monitored to ensure no routes or trips are disproportionately affected by service cuts.

- NFTA Metro maintains a minimum of 99% of all annual scheduled trips operating.

3.5 Service productivity

What is it?

Service productivity measures the efficiency of a bus route, which takes into account ridership and net costs associated with its operation.

Why is it important?

Service productivity is heavily considered when determining the operation of a transit route.

Highly productive routes serve more people and subsequently have the highest farebox recovery, or money paid for fares that offset the price of operating the bus. Routes that are highly productive will benefit as first preference for any upgrades to service.

What can riders expect?

NFTA Metro evaluates Core Services with a calculation of passengers per revenue hour. Passengers are counted by Automatic Passenger Counting (APC) devices installed onto all vehicles. Revenue hours are the number of hours that buses are operating on a route in a time period, such as day or year. Using passengers per revenue hour normalizes the data between routes of different lengths.

NFTA Metro evaluates Supporting Services with a calculation of passengers per trip, because within this category, ridership is less impacted by route length. A trip is each time a transit vehicle operates its full route in a single direction.

NFTA Metro also considers farebox recovery* to guide decisions and evaluate productivity. Farebox recovery can show how much a transit route is paying for itself, or what the net costs are. Routes that have high farebox recovery are considered productive.

*Farebox revenue is not the majority source of funding for any NFTA Metro routes.



3.6 Service capacity

What is it?

Service capacity is the number of riders that NFTA Metro vehicles can safely accommodate. Due to a varied set of vehicles with different capacities, NFTA Metro analyzes passenger loads on a service tier level. Passenger loads refer to the relationship (ratio) of the number of actual riders counted on those vehicles to the total capacity of the transit vehicle (how many can be comfortably seated). This is reported as a percentage, where 100% represents a full bus of seated riders. Percentages over 100% indicate that passengers may be expected to stand for a period of no longer than 15 minutes along the route of the vehicle. It is an industry-standard to provide passenger load guidelines over 100%.



Why is it important?

For the safety of riders and efficiency of the NFTA Metro network, decisions must be made on how many vehicles can serve a route in relationship to ridership. Given the natural budget constraints of public transit, NFTA Metro must balance the comfortability of riders with the amount of service it can provide.

What can riders expect?

NFTA Metro has identified the acceptable amount of passenger load to meet ridership demands for a given service tier. Riders can be expected to stand for up to 15 minutes of the duration of their trip without finding a seat. Routes that are consistently and significantly over-capacity may warrant larger capacity vehicles and/or higher service frequency to meet demand. During off-peak hours, riders may be more likely to sit for the duration of their trip.

- A typical 40-foot bus has a seated capacity (100%) of 38 passengers.
- A typical Metro Rail car has a capacity of 120 passengers; Metro Rail typically operates 3 cars per train.

Maximum Passenger Load Guidelines		
Route Type	Peak Hours	Off-Peak Hours
<i>Metro Rail</i>	150%	130%
<i>Bus Rapid Transit</i>	140%	120%
<i>Frequent</i>	140%	120%
<i>Standard</i>	120%	110%
<i>Limited Stop</i>	140%	120%
<i>Suburban Express</i>	100%	N/A
<i>Local Express</i>	100%	N/A
<i>On-Demand Microtransit</i>	100%	100%

4. Service Evaluation Process

4.1 Why do we evaluate or change service?

NFTA Metro operates on a budget like all public authorities and must make decisions that affect service. Public transportation services change due to changes in community needs, as well as available budget and operational feasibility.



4.2 How is service evaluated?

For all service evaluations, it is important to compare like-routes to each other. Therefore, NFTA Metro evaluates service tiers, as well as the individual routes. Service is evaluated at NFTA Metro annually and can change seasonally.

Step 1 – Average route statistics

To begin evaluation, data for each route is averaged by day type (weekday, Saturday and Sunday) for the entire year. For instance, daily ridership might vary depending on the time of year or day, but an average will allow the route to be compared to others.

Statistics Evaluated:

- **Average ridership**
- **Service productivity** (either average passengers/revenue hour, or average passengers/trip)
- **Average farebox recovery rate**
- **Average passenger load percentage**

Step 2 – Average tier statistics

Next, the collective average will be calculated from all of the routes that belong to a particular service tier, such as Frequent or Standard. This will allow for comparison among routes and create an average metric to compare the individual routes to.

Statistics Evaluated:

- **Average tier ridership**
- **Tier Service productivity** (either average passengers/revenue hour, or average passengers/trip)
- **Average tier farebox recovery rate**
- **Average tier passenger load percentage**

Step 3 – Sort routes within tiers and compare

During this comparison, routes will be sorted as above or below the service tier average statistic.

All of these sorted tiers will be compiled to analyze together.

Step 4 – Consider possible changes

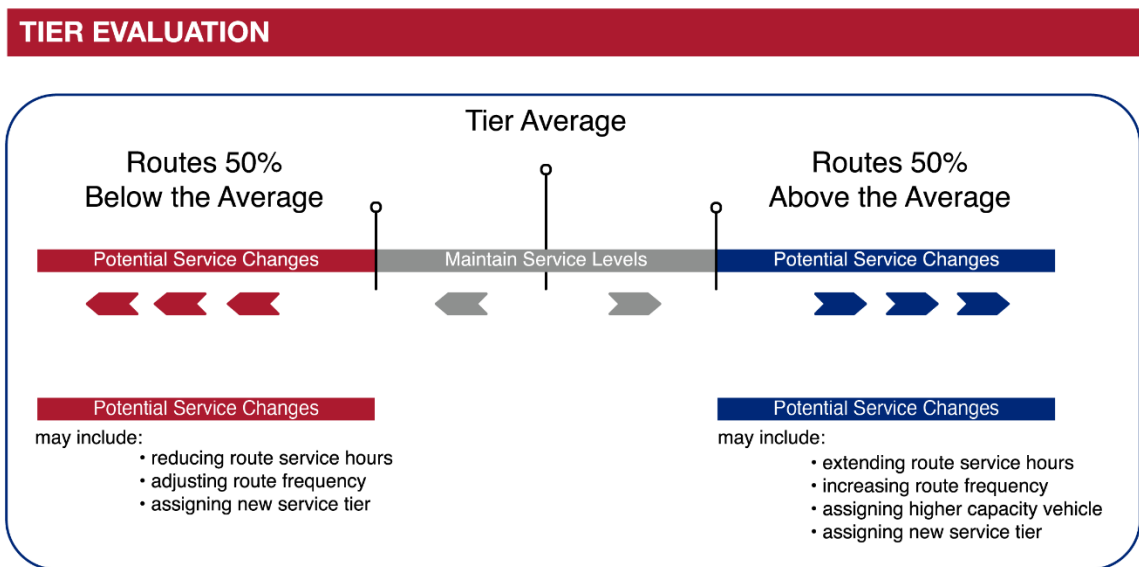
Routes are compiled and reviewed by NFTA Metro Service Planning staff further to understand how significant the deviation from the average is of a statistic for a route.

The 50% of routes that are **below the tier average** are considered underperforming and have the potential for service changes (route promotion and marketing, cuts, reduced hours, or possible reduction of service tier).

- Lowest 25% of routes in a tier are considered severely underperforming and are eligible for potential downgrade of service tier, service reduction or elimination

The 50% of routes that are **above the tier average** are high-performing and considered for potential service changes (extended hours, more frequency, or higher service tier).

Highest 25% of routes in a tier are considered for prioritization, investment, and tier upgrade.



Graphic Adapted from MARTA (Atlanta, GA)

Step 5 – Essential considerations

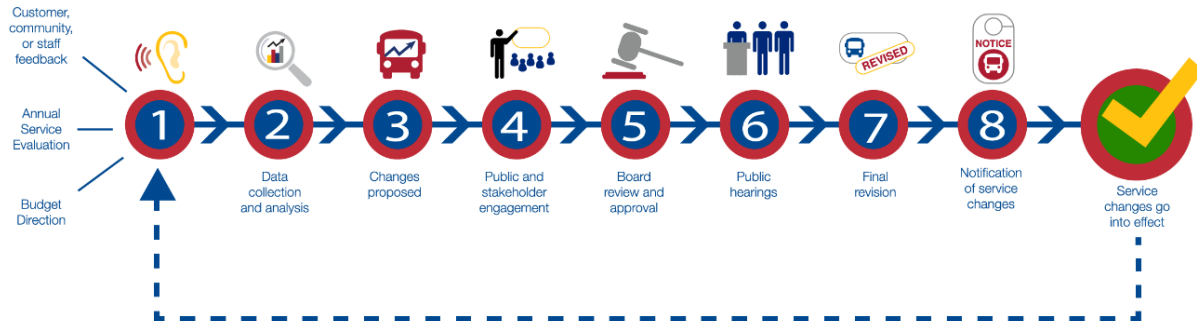
Statistics can tell a compelling story, but they are not always used as a determinant for change. Other factors are considered that may be impactful for the route. This includes things like equity and environmental concerns, as well as providing “lifeline” transportation for those who have no other options. Referral to the **Transit Need Index** occurs at this stage to determine if the change has an impact on communities with higher transit needs. If there is a potential detrimental impact on high-need communities, this may be an overriding factor to maintain service at current levels.

Step 6 – Finalize and implement changes

Some decisions majorly affect service and therefore require public outreach, public hearings and board approval. Other decisions that may slightly but not significantly alter a route or schedule can be done on a day-to-day basis by NFTA Metro staff at their discretion.

4.3 Service change process

SERVICE CHANGE PROCESS



Graphic Adapted from MARTA (Atlanta, GA)

4.4 Actions to improve ridership and productivity

NFTA Metro may take action to improve ridership and productivity on underperforming routes before routes are eliminated, such as:

- **Routing adjustments**, such as realignment or the discontinuation of unproductive segments of a route, or by reassigning its service tier.
- **Marketing and promotional strategies**, such as social media, a pop-up table at a local event, signage, leaflets, postcard mailings, and more. Furthermore, attracting ridership through local employers and the **Corporate Pass Program**
- **Operational adjustments**, including adjustments to the headways or frequency of service, the span of service, eliminating service at specific time periods or deleting specific trips.

4.5 New service proposals and cost recovery requirements

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, which are set by the average of a service tier. New service proposals are also considered based on any noticeable gaps in service to areas of High or Medium-High Transit Need in accordance to the Transit Need Index.

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.

4.6 Service reduction guidelines

Routes that perform below the tier average in evaluation statistics are underperforming. These underperforming routes are eligible for service and operational change. Changes may include trip cuts or reduction of revenue hours. Routes that are severely underperforming (in the bottom 25% of routes in their tier) may be downgraded to a lower service tier or eliminated. Considerations for equity using the Transit Need Index will be included in the decision process before route service reduction or elimination.

5. Frequently Asked Questions (FAQs)

Why can't a bus stop be located closer to my home or workplace?

Bus stops are located along route corridors. If there are more bus stops along a route the bus must stop more often, which slows down the bus and often makes bus trips longer for passengers. NFTA Metro must balance bus stop access and passenger convenience with the desire to keep the bus in motion and minimize travel time.

Why can't my bus route be changed to be closer to my home or workplace?

For transit to serve the greatest number of people while maintaining efficiency and value, bus routes need to be direct with limited deviation. NFTA Metro buses serve major roads and try to maintain a simple direction of travel. NFTA Metro is not able to make major bus route adjustments exclusively based on individual rider feedback.

Door-to-door bus service is neither financially viable nor operationally possible for NFTA Metro to provide. For qualified individuals with limited mobility, NFTA Metro offers *PAL Direct* paratransit service. Please contact PAL Customer Service or see our website for more information.

Why is my bus running late?

Traffic, road construction, crashes, and weather-related events may delay the arrival of your bus. A lot of passengers boarding at a stop, and frequent bus stops also may delay the bus. NFTA Metro has committed itself to provide on-time performance at an acceptable level determined by these service standards. Routes are continuously monitored and adjusted when consistent reliability issues are seen by NFTA Metro.

Why is my bus full or crowded?

High demand and ridership for bus service along a route can be the reason for a full bus. NFTA Metro monitors passenger load to determine options for regularly full buses, which may include adding more buses to a route, or using a transit vehicle with more capacity.

Why does my bus stop not have a shelter or a bench?

NFTA Metro does not have the financial resources to provide shelters and benches at every stop location. Shelters and benches require significant dedicated capital and operating expenses. Due to these limited resources, shelter locations are prioritized to serve as many riders as possible; stops may not have room in the public right-of-way (municipal-owned street space) for a shelter, as well. NFTA Metro continues to evaluate shelter proposals continuously.

Why don't buses run all the time?

NFTA Metro does not currently have demand for 24/7 service, so this is not a feasible option at this time. However, NFTA Metro is dedicated to operating routes to provide reliable service for most routes every day. If additional funding becomes available or ridership increases, service hours may be altered for individual routes first.

Why does my bus only arrive every hour?

NFTA Metro considers many of factors when determining how frequent a bus runs. These include existing ridership, proximity to employment generators, available resources, adjacent land use, and development context. These are evaluated on a continuous basis and may be adjusted seasonally.

Why is the bus so slow?

Buses operate on the same roads as cars. They are impacted by the same delays as a private vehicle, like traffic. We are dedicated to the safety of our riders. Buses must allow for passengers to board and disembark safely at stops.

Why is the bus running empty?

NFTA Metro buses may have fewer passengers on them when they are beginning or ending a trip, or when they are headed to and from the garage. NFTA Metro strives to provide regular service for those who need it most as a “lifeline” for those without other means of transportation.

Why aren't there buses out to rural areas?

It is important for NFTA Metro to serve the largest population as possible with limited available funds. Service is most impactful in areas with existing high ridership and/or transit supportive land use (concentrations of housing or jobs). In many cases, operating a route into rural and low-population density areas is not efficient or financially viable.

Why doesn't Metro Rail go to: the airport? The Tonawandas? The Southtowns? Niagara Falls? Etc.

NFTA Metro is exploring expansion options as they become reasonably economically and operationally viable. Due to a limited capital budget, increasingly competitive federal and state funding, and a lack of density and existing ridership, NFTA Metro is presently unable to provide fixed light-rail service to all communities within the service area.

Community members who wish to see public transit infrastructure expanded in their area are encouraged to contact their local municipal, county, state, and federal representatives to call for additional funding and resources to provide enhanced transit service. NFTA Metro is supported by your tax dollars, in addition to farebox revenue and corporate contracts.

Why are Metro Rail stops so far apart?

Fixed light rail service is only efficient when stations are located at least a half-mile apart from one another. Additional stations and stops would make travel time longer for riders and would make Metro Rail less efficient, and more expensive to operate.

Appendix

Appendix A – Glossary of Transit Terms

Alighting	To step off a vehicle, i.e. to disembark a bus or rail car
AM peak	The portion of the morning where the greatest level of ridership is experienced, and most frequent level of service is schedules
APC	Automatic Passenger Counter
Arrival time	Time a vehicle is scheduled to arrive at a time point
Automatic Passenger Counter	Electronic device that is installed on a transit vehicle to accurately record boarding and alighting data
Base period	Off-peak period between AM Peak and PM peak
Boarding	To enter a vehicle for the purpose of taking a ride from one location to another
Bus rapid transit	Also called a BRT, busway or transitway, is a bus-based public transport system designed to improve capacity and reliability relative to a conventional bus system. It typically operates on a fixed-route with designated right-of-way, limited stop and operates similarly to a light-rail or streetcar.
Bus stop	A place where passengers can board or alight a vehicle, indicated by a route sign
Commuter	A person who travels regularly
Commuter rail	Dedicated heavy rail that operates during peak periods from outlying suburbs to the city center during the week
Deboarding	(see alighting)
Departure time	Time a vehicle is scheduled to depart from a time point location
DOT	Department of Transportation
Express Bus	A bus that operates a portion of the local route with or without limited stops and also operates a portion of the route via thruway or expressway
Fare Box	Device used to accept paper, coins, swipe cards, or mobile fare payments
Fare Box recovery ratio	Measure of the proportion of operating expenses covered by passengers' fares divided by operating expenses
Fare structure	A system set up to determine how much is to be paid by various passengers using a transit vehicle
Fixed route	Service provided on a repetitive, fixed-schedule basis along a specific route with vehicles stopping to pick up and deliver passengers between specific locations
Frequency	How often trips operate
FTA	Federal Transit Administration (formerly UMTA)
Headway	Defined by the scheduled time interval between vehicles operating in the same direction on the same route (or bus frequency)
Heavy rail	Electric rail transit system with exclusive right-of-way and high volume of passengers
Inbound	Trips traveling towards the City Center or a major hub
Intermodal	Trips involving more than one mode of transportation (also: multimodal)
Light rail	Electric rail transit with light volume of traffic capacity compared to heavy rail. May be exclusive or shared right-of-way (e.x. NFTA Metro Rail) May be abbreviated to: LRT or LRRT
Load Factor	Ratio of passengers actually carried versus vehicle passenger capacity (also Passenger load)
Local	A bus that operates its entire route via local thoroughfares
Micromobility	Range of small, lightweight vehicles operating at low speeds (<25 mph) and driven by users personally.
Microtransit	Form of demand-responsive transport using flexible routing and/or flexible scheduling; operate in an area not along a
Multimodal	Seamless connectivity between different modes of transportation
NYSDOT	New York State Department of Transportation

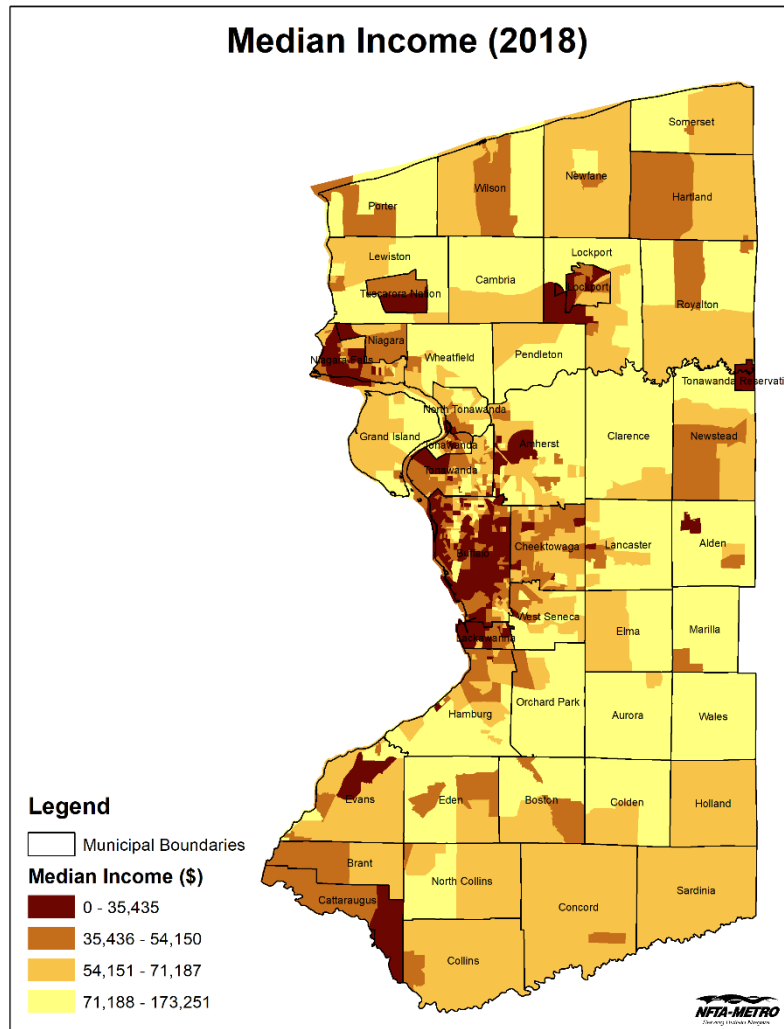
Off peak period	See base period
On-time performance	Percentage of time buses arrive at their time points at their scheduled times
Operating assistance	Financial assistance for transit operating systems, such aid may originate with federal, local or state governments
Operating costs	All costs involved with running a transit system
Outbound	Trips traveling away from the City Center or a major hub
Paratransit	Comparable transit service required by the ADA for qualified individuals with disabilities
Park & Ride/Park-and-ride	Designated parking areas for automobile drivers who then board transit vehicles from these locations
Peak period	Morning and afternoon time periods when transit riding is heaviest
PM peak	Afternoon portion where the greatest level of ridership is experienced, and most frequent level of service is scheduled
Rapid rail	See heavy rail
Reverse commute	Trips in opposite direction to the main flow of traffic (ex. Traveling from the city center to the suburbs during commuting hours)
Ridership	The total number of a passengers on a trip
Route	Fixed service consisting of start and end locations with time points in between, typically covering a specific area, destination, or major roadway
Service area	An agencies' operating area, consistent with ADA requirements
Shelter	A structure located near a bus stop to provide protection from the elements for the convenience of passengers
Shuttle	A vehicle that travels back and forth over a particular route, usually a short route that provides connections between transit centers, employment center, etc
Span of service	The hours of service a route operates from the first trip on a route to the last trip
Time point	Points along a route that indicate when a vehicle will be there
Transfer	A point or location where two or more routes come together at the same or similar times to afford passengers to make a connection
Transit center	Location where multiple routes intersect or layover, providing passengers with transfer opportunities
Trolley	A bus whose appearance replicates a trolley
Transfer center or point	A fixed location, where passengers interchange from one route or vehicle to another
Trip	The one-way operation of a vehicle between a starting time point and an ending time point, typically indicated by either inbound or outbound
USDOT	United States Department of Transportation
Variant	Leg or branch of a route that does not follow the main route path

This glossary has been adapted from NFTA Metro internal glossaries, and resources from the American Public Transportation Association (APTA).

Appendix B – Transit Need Index 2021

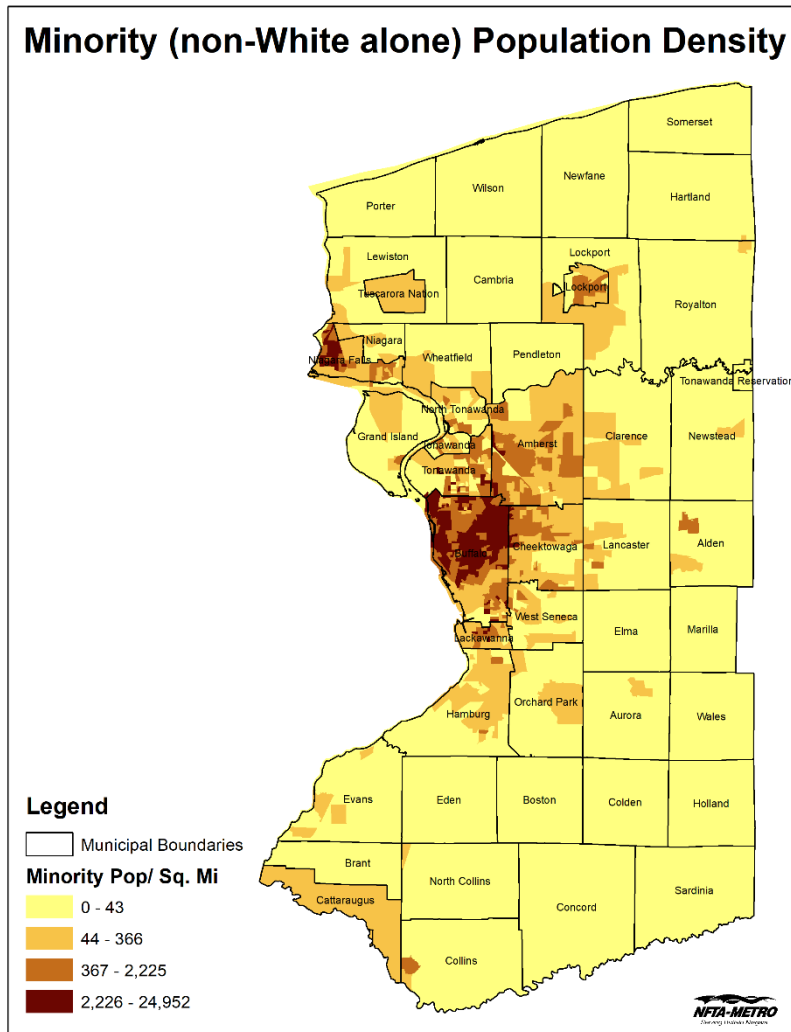
2021 Transit Need Index was created in January 2021 using Census data from 2018.

B1. Median Income



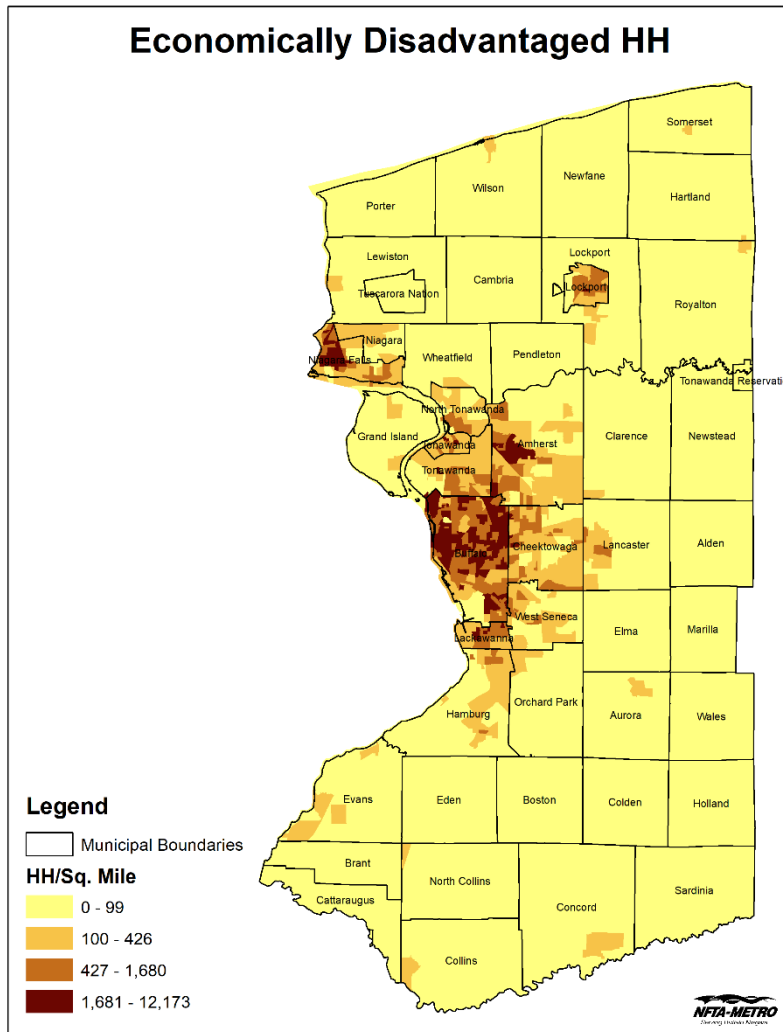
The census block groups with the lowest median incomes are located primarily in Buffalo (in the East and West Sides), Niagara Falls, Lockport, Lackawanna, parts of Tonawanda by the Niagara River, Amherst by University at Buffalo, Cheektowaga and some rural villages (Alden and Derby) and tribal reservations (Tuscarora, Tonawanda, and Cattaraugus). The highest median income block groups are in suburbs like Amherst, Clarence, Aurora, Orchard Park and Wheatfield, with some blocks within the West Side and North Buffalo.

B2. Minority (All but White-alone) Population Density



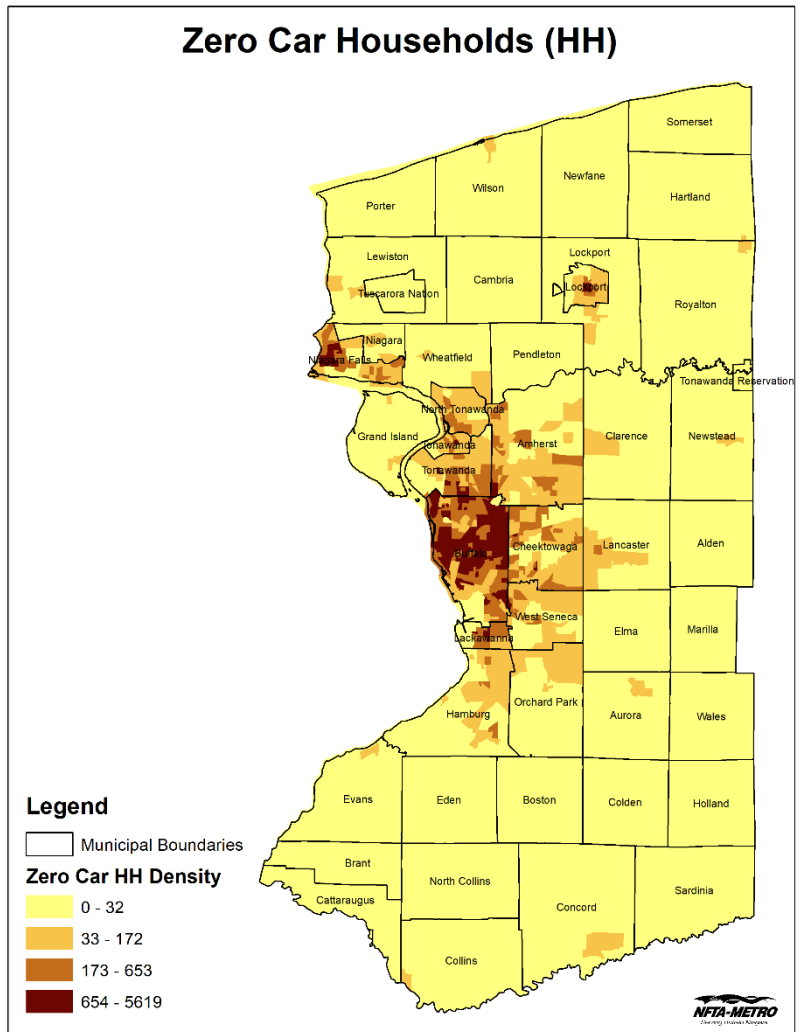
The census blocks with the highest density of minority populations are located primarily in Buffalo (West and East Side neighborhoods), Niagara Falls, Lockport (city), Lackawanna, Cheektowaga and Amherst. The census blocks with the lowest population density of minority populations are in suburban towns outside of the urban core.

B3. Economically Disadvantaged Households (HH) Density



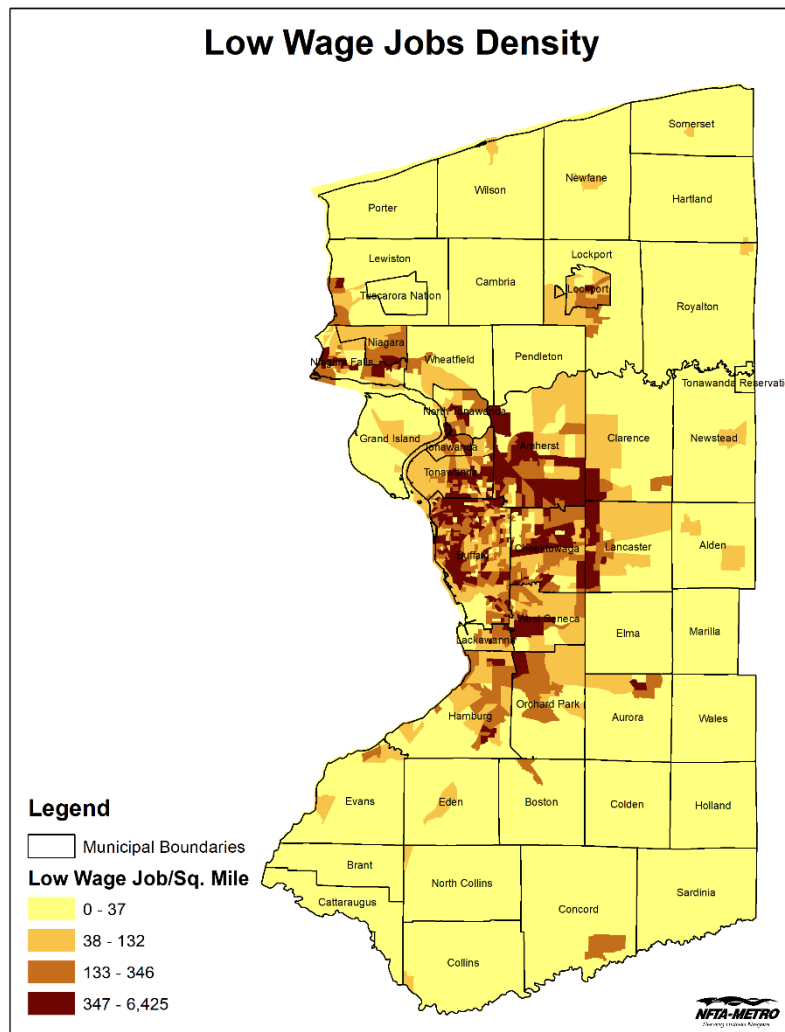
The census block groups with the highest density of economically disadvantaged households (HH) are in Buffalo (East and West Side, North and South Buffalo), Niagara Falls, Lackawanna and the University at Buffalo North Campus.

B4. Zero Car Households (HH) Density



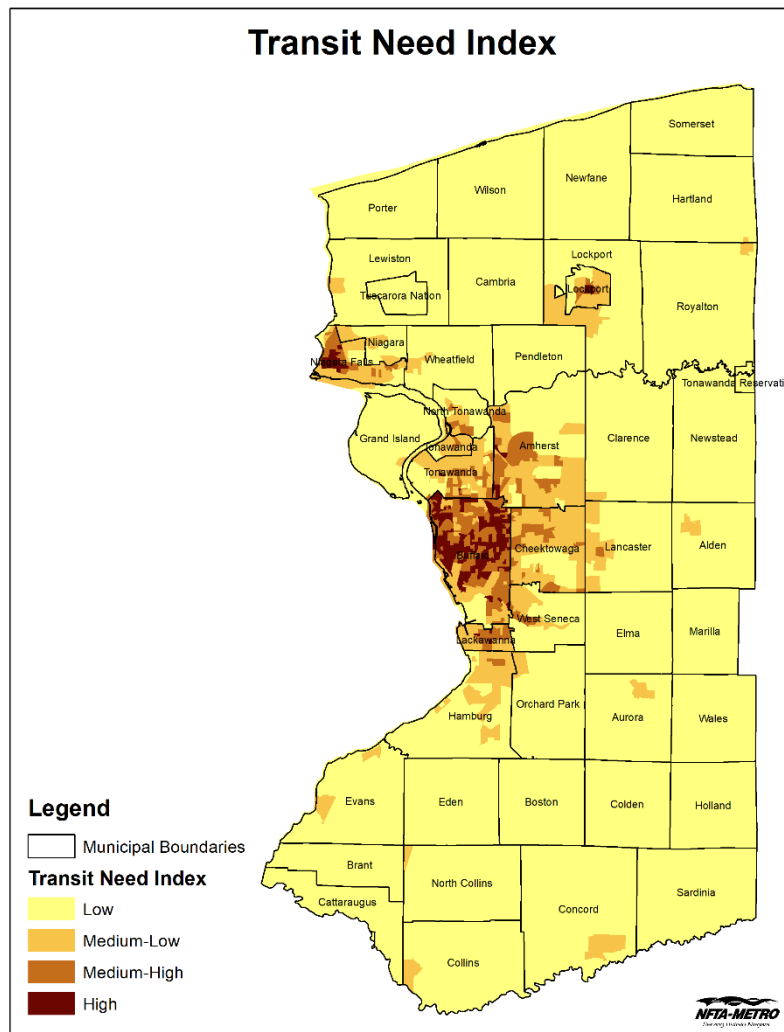
The census block groups with the highest concentration of households with zero cars are in the City of Buffalo (East and West Side neighborhoods), the City of Niagara Falls and the City of Lackawanna. The block groups with the lowest concentration are in the rural towns outside of the service area.

B5. Low Wage Jobs Concentration



The census blocks with the highest concentration of low wage jobs (<\$1,250 per month) are located in Buffalo (West Side, North and South Buffalo), Cheektowaga, Amherst, Clarence by Transit Road, Town and City of Tonawanda, West Seneca, Orchard Park by the McKinley Mall and Erie Community College South Campus, the Village of Hamburg, Niagara Falls and Town of Niagara near Niagara Falls Blvd, North Tonawanda by River Road, and downtown Lockport.

B6. Finalized Index



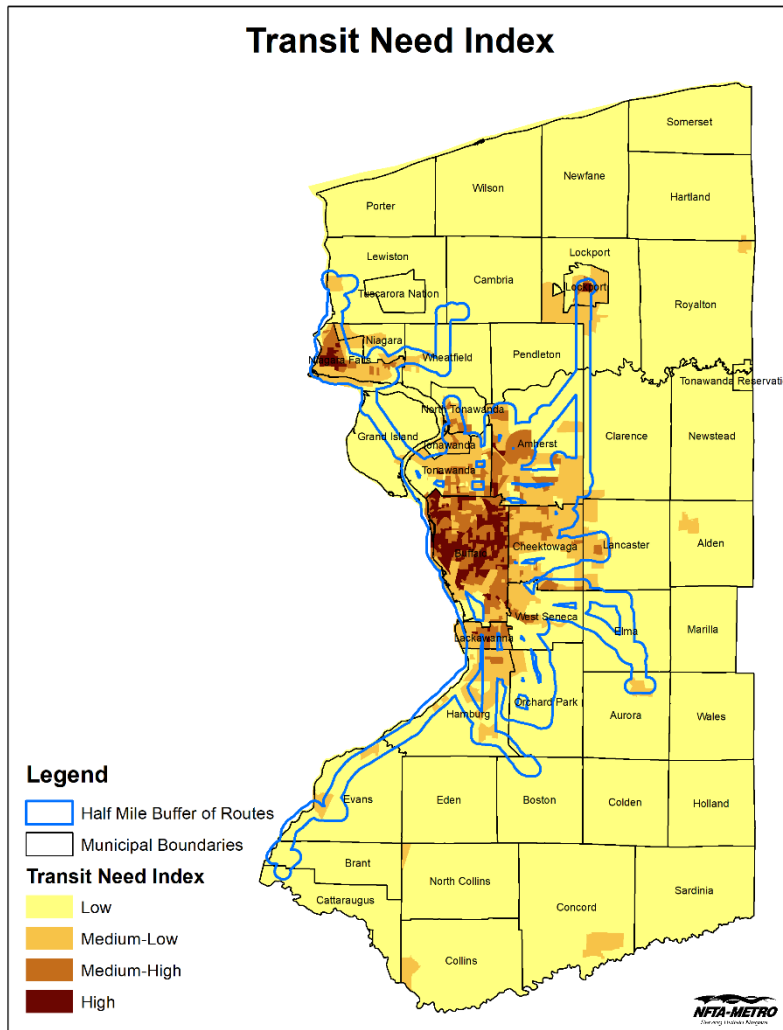
High Transit Need

- Buffalo (primarily East Side and West Side; areas in South and North Buffalo)
- Lackawanna (along South Park Ave)
- Lockport, City (Downtown)
- Niagara Falls (near Hyde Park)

Medium-High Transit Need

- Amherst
- Buffalo (areas in South and North Buffalo)
- Cheektowaga, near Walden/Airport
- Lackawanna
- Lancaster/Depew, Villages
- Orchard Park, near ECC/McKinley Mall
- Tonawanda, Town
- West Seneca surrounding Seneca St

B7. Finalized Transit Need Index with Service Area Overlay



This is the finalized Transit Need Index map with a half-mile buffer of NFTA Metro routes. This shows that NFTA Metro services the region's High and Medium-High Transit Need communities, as well as a majority of Medium-Low communities with its fixed-route bus service.

Appendix C - Current Service Tiers 2021

Core Services

Metro Rail - DL&W Station (*planned*) to University Station

Frequent

- 3 – Grant
- 5—Niagara Kenmore
- 12 – Utica
- 13—Kensington
- 19 – Bailey
- 20—Elmwood
- 23—Fillmore Hertel
- 24—Genesee
- 25—Delaware
- 26—Delavan
- 32—Amherst

Standard

- 1—William
- 2—Clinton
- 4—Broadway
- 6—Sycamore
- 8—Main
- 11—Colvin
- 14—Abbott
- 15—Seneca
- 16—South Park
- 18—Jefferson
- 22—Porter Best
- 34—Niagara Falls Blvd
- 35—Sheridan
- 40—Buffalo-Niagara Falls
- 42—Lackawanna
- 44—Lockport
- 46—Lancaster
- 47—Youngs Rd
- 48—Williamsville
- 49—Millard Suburban
- 50—Main Niagara
- 52—Hyde Park
- 55—Pine Ave

Supporting Services

Limited Stop

24L – Airport/Downtown Limited

Suburban Express

60—Niagara Falls

64—Lockport

66—Williamsville

67—Cleveland Hill

68—George Urban

69— Lancaster

70— East Aurora

72— Orchard Park

74 -- Hamburg

76 -- Lotus Bay

81 -- East Side

Local Express

24X—Genesee Express

Trolley

Niagara Falls Trolley (*seasonal*)

Acknowledgements

This document relied on precedence set by several innovative peer agencies including:

- American Public Transportation Association (APTA)
- COTA (Columbus, OH)
- IndyGo (Indianapolis, IN)
- King County Metro (Seattle, WA)
- LA Metro (Los Angeles, CA)
- MARTA (Atlanta, GA)
- National Association of City Transportation Officials (NACTO)
- Port Authority (Pittsburgh, PA)
- RTS (Rochester, NY)

NFTA Metro credits these peer agencies and organizations with providing inspiration and best-practices for various sections of this document.

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.

A. Demographic and Service Profile Maps and Charts

The most recent American Community Survey (ACS) data from 2018-2022 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 10.5.

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 Metro 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 Metro 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

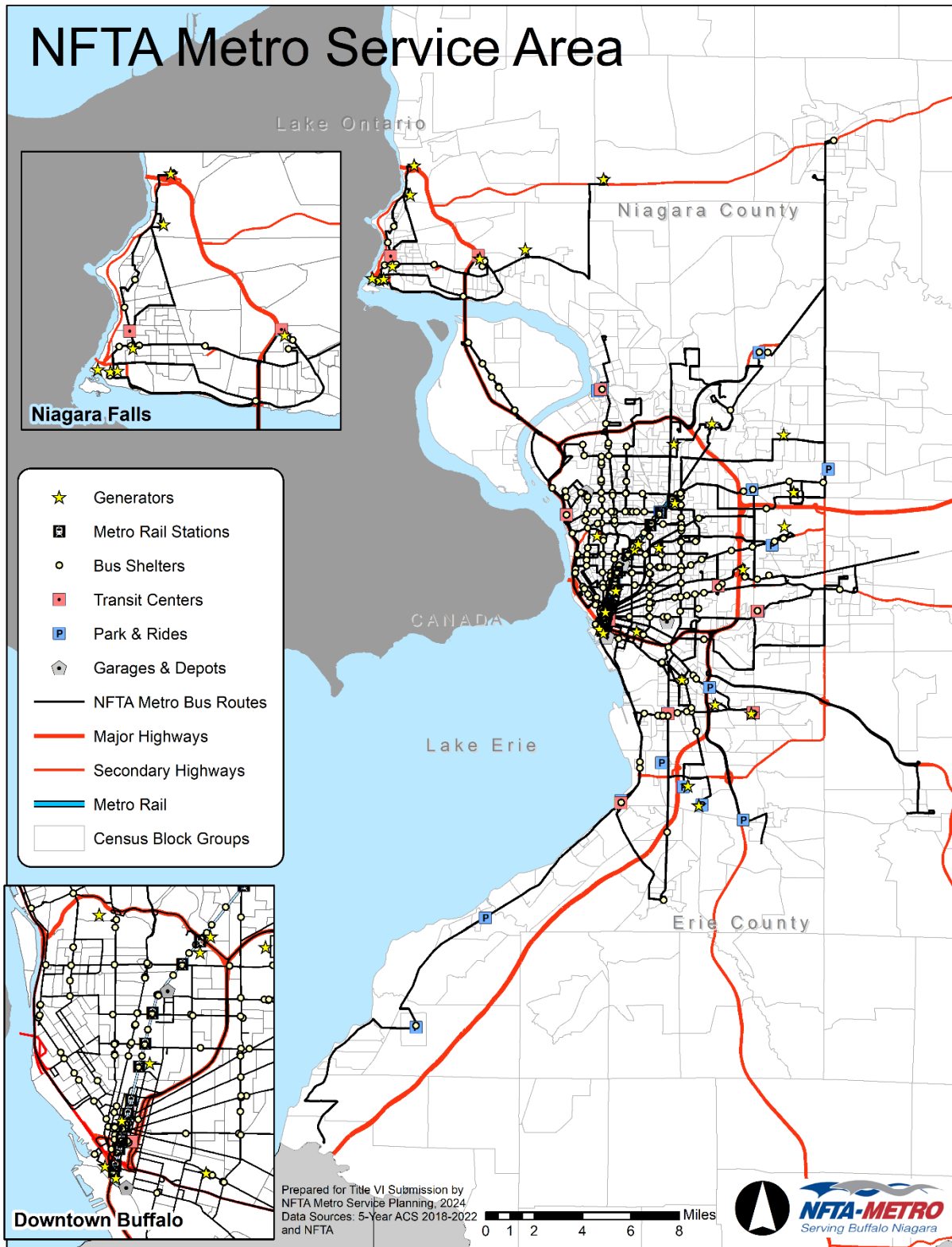
Using the Table “Race” (ID B02001), from the American Community Survey (ACS), minority population by census block group was determined by taking the total population of the census block group and subtracting the “White Alone” population. The remaining population, including “Black or African American 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 25.8%. Any census block groups with a minority percentage of 25.8% and above were considered minority census block groups, and any census block groups below 25.8% were not considered minority census block groups.

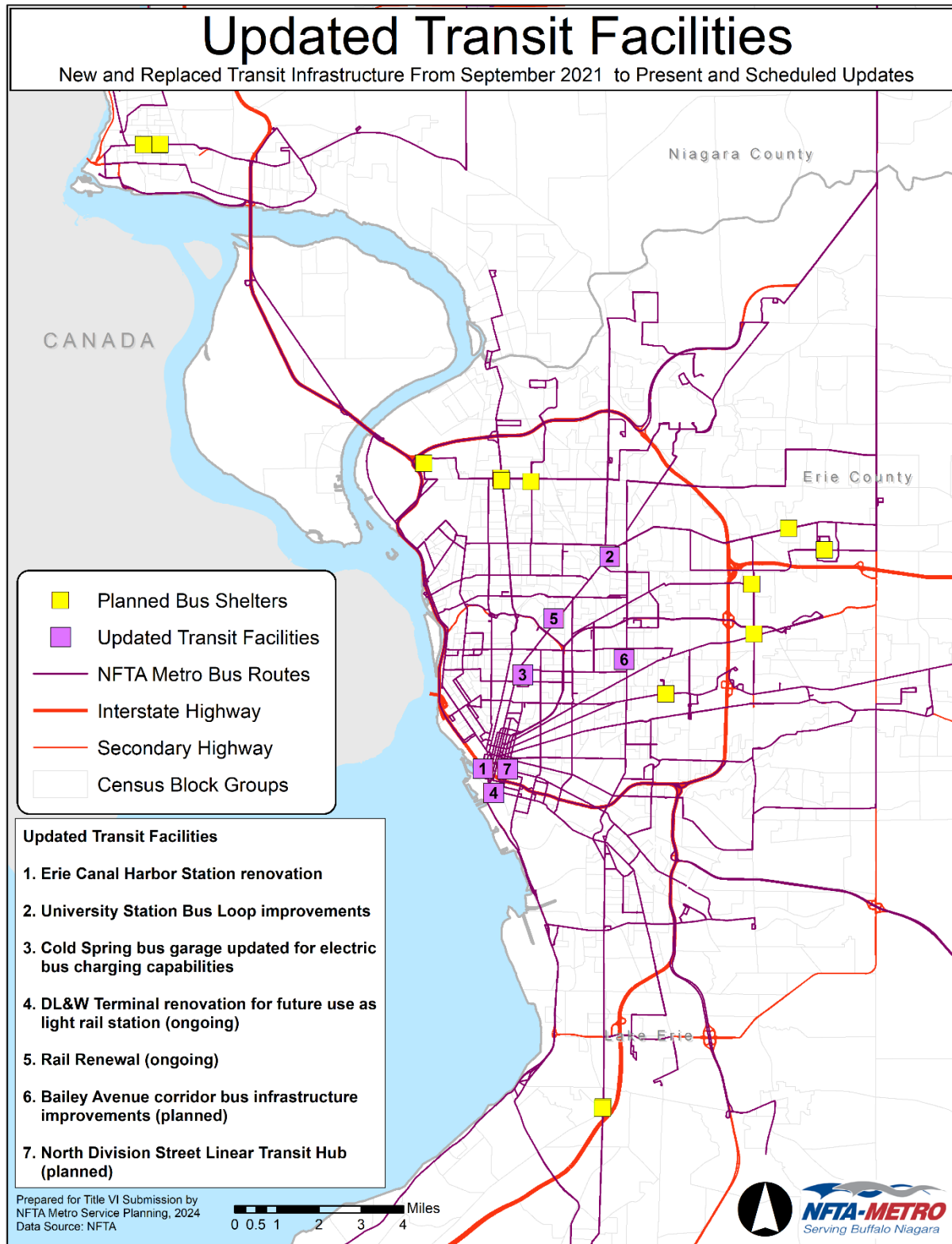
Low-Income Population

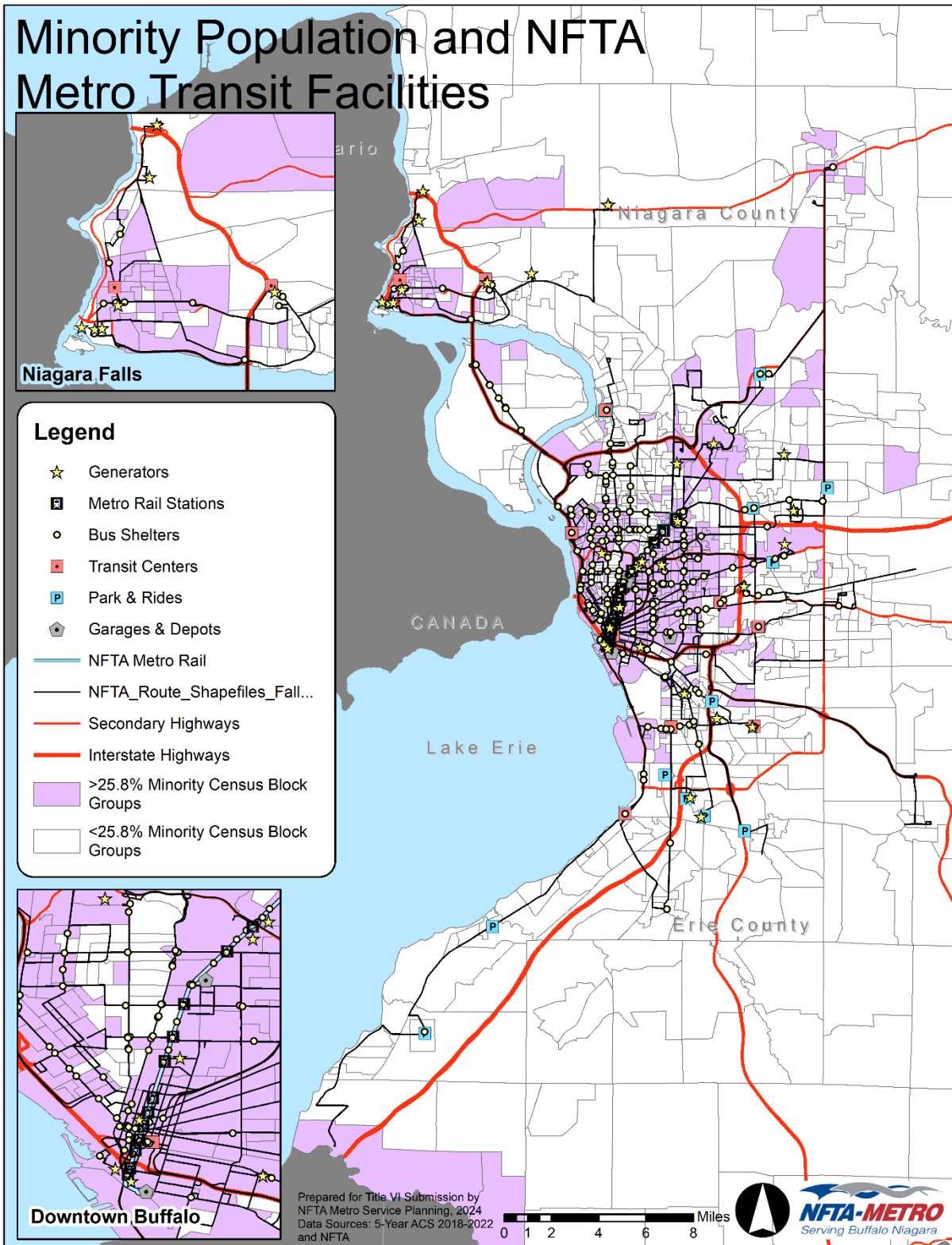
FTA Circular 4702.1B defines a low-income person as *“a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines.”* The Census measurement of poverty level is similar to the HHS poverty guidelines in that it sets a median household 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 Metro service area.

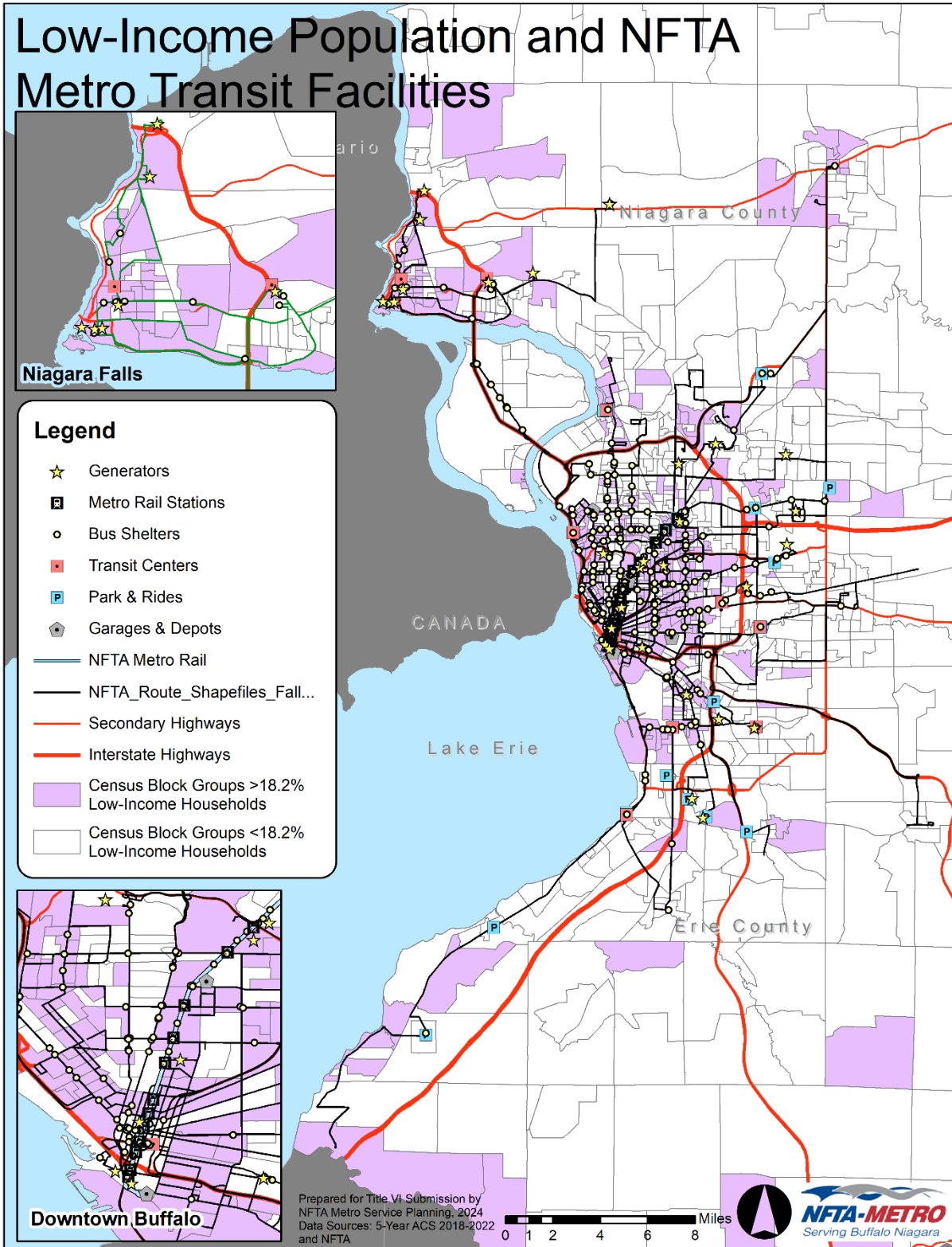
Using the Table “Poverty Status in the Past 12 Months by Household Type by Age of Householder” (ID B17017), low-income population percentage by census block group was determined by the proportion of households in the census block group where “income in the past 12 months is below poverty level” to the 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 18.2%. Any census block groups with a low-income percentage of 18.2% and above were considered minority census block groups, and any census block groups below 18.2% were not considered low-income census block groups.

Map 1 - NFTA Metro Service Area Base Map









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)

GBNRTC and NFTA are currently in the process of conducting the 2024 Onboard Survey. Surveying will be completed by the end of October 2024, with a final report in January 2025. For this report we will reference the 2021 Onboard Survey.

In 2021, NFTA and the Greater Buffalo-Niagara Transportation Council (GBNRTC) retained WBA Research and Foursquare ITP to conduct an origin/destination study of fixed-route bus 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 Spanish. 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 English and Spanish. There were 2,562 respondents to the survey, and the sample reflected a statistical accuracy of 90 percent and a +/-5 percent margin of error at the system level.

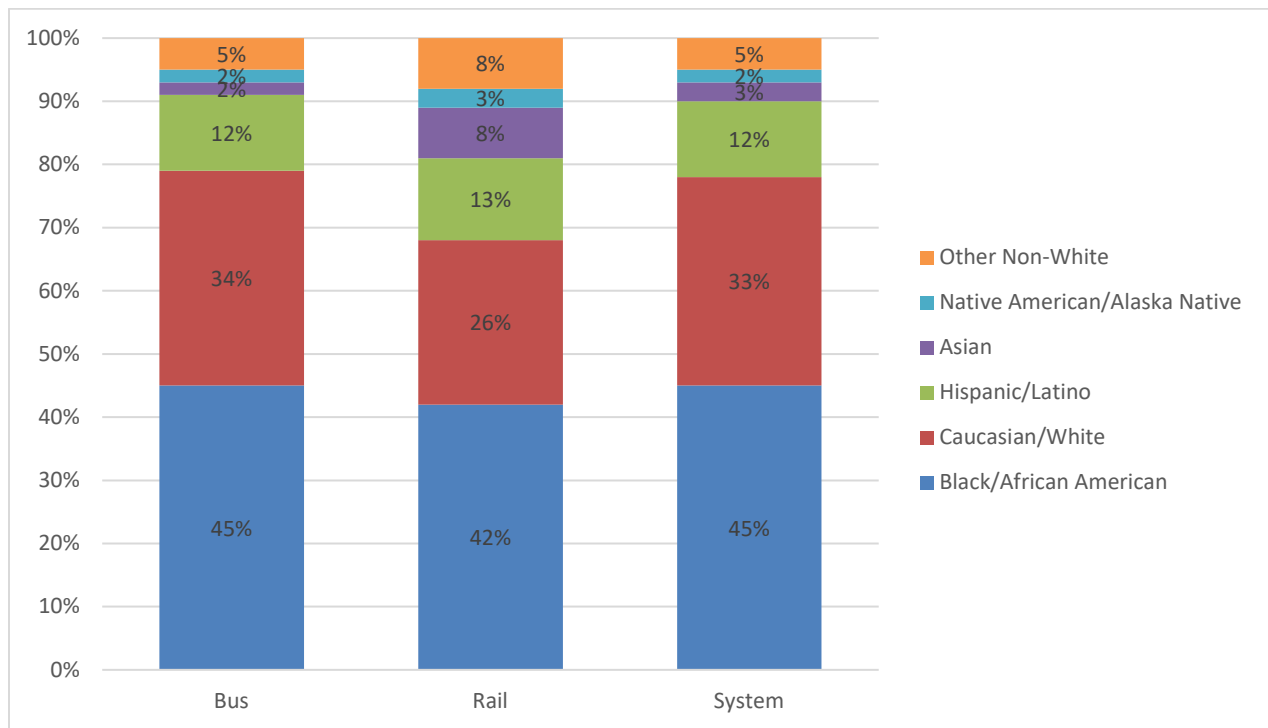
Minority Travel Patterns

“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 a third were Caucasian/White, and over ten percent were Hispanic/Latino. In total, minorities make up approximately 67 percent of NFTA Metro riders.

The following table highlights service area demographics from Census data in comparison to the NFTA Metro 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 Metro riders are Black/African-American, they make up only 12 percent of the service area’s population. Hispanic/Latino and Native American/Alaska Native populations are also more highly represented among NFTA Metro riders than in the total service area population. Based on the survey results, at least two thirds of riders on both bus and rail modes are minorities.

Race and Ethnicity	Bus	Rail	Systemwide Total	NFTA Service Area
Black or African American	45%	42%	45%	12%
Caucasian/White	34%	26%	33%	76%
Hispanic or Latino (of any race)	12%	13%	12%	5%
Native American/ Alaska Native	2%	3%	2%	<1%
Asian	2%	8%	3%	3%
Native Hawaiian or Pacific Islander	<1%	0%	<1%	<1%
Two or More Races	4%	6%	4%	2%
Other	1%	3%	2%	2%
Net: People of Color and/or Hispanic or Latino	66%	74%	67%	24%



The table below shows ridership by ethnicity by NFTA Metro route, excluding school and seasonal routes. Statistics for routes with fewer than fifty responses are not shown due to a higher margin of error. Of the routes shown, Route 13-Kensington (89%) and Route 26-Delavan (82%) have the highest percentage of minority riders. Route 25-Delaware (41%), Route 16-South Park (42%), and Route 15-Seneca (42%) have the lowest minority ridership.

Percentage by Race/Ethnicity							
Route	Asian	Black/African-American	Caucasian/White	Hispanic/Latino	Native American	Two or More	Other ⁶
1 William	*	*	*	*	*	*	*
2 Clinton	0%	39%	48%	9%	2%	2%	0%
3 Grant	2%	30%	33%	23%	4%	6%	1%
4 Broadway	*	*	*	*	*	*	*
5 Niagara	1%	41%	23%	23%	1%	9%	2%
6 Sycamore	5%	42%	29%	18%	3%	3%	0%
8 Main	0%	64%	19%	8%	2%	4%	4%
11 Colvin	0%	29%	50%	15%	0%	5%	2%
12 Utica	2%	65%	20%	7%	2%	4%	1%
13 Kensington	4%	79%	11%	4%	0%	0%	2%
14 Abbott	*	*	*	*	*	*	*
15 Seneca	0%	27%	58%	11%	0%	3%	1%
16 South Park/McKinley Mall	1%	12%	58%	19%	5%	3%	2%
18 Jefferson	*	*	*	*	*	*	*
19 Bailey	1%	63%	16%	14%	0%	5%	1%
20 Elmwood	0%	43%	43%	9%	3%	0%	1%
22 Porter/Best	*	*	*	*	*	*	*
23 Fillmore/Hertel	0%	47%	35%	13%	0%	5%	0%
24 Genesee	*	*	*	*	*	*	*
25 Delaware	0%	30%	59%	6%	1%	3%	1%
26 Delavan	2%	72%	18%	4%	0%	4%	2%
32 Amherst	5%	55%	23%	9%	1%	5%	3%
34 N. Falls Blvd.	5%	57%	25%	8%	2%	3%	0%
35 Sheridan	*	*	*	*	*	*	*
40 Grand Island	3%	41%	34%	14%	2%	3%	3%
42 Lackawanna	*	*	*	*	*	*	*
44 Lockport	*	*	*	*	*	*	*
46 Lancaster	*	*	*	*	*	*	*
47 Youngs Road	*	*	*	*	*	*	*
48 Williamsville	*	*	*	*	*	*	*
49 Millard Suburban	*	*	*	*	*	*	*
50 Main/Niagara	*	*	*	*	*	*	*
52 Hyde Park	*	*	*	*	*	*	*
55 Pine Avenue	*	*	*	*	*	*	*
60 Niagara Falls	*	*	*	*	*	*	*
61 Tonawanda	*	*	*	*	*	*	*
64 Lockport	*	*	*	*	*	*	*
66 Williamsville	*	*	*	*	*	*	*
67 Cleveland Hill	*	*	*	*	*	*	*
69 Alden	*	*	*	*	*	*	*
70 East Aurora	*	*	*	*	*	*	*
74 Boston	*	*	*	*	*	*	*
76 Lotus Bay	*	*	*	*	*	*	*
81 East Side	*	*	*	*	*	*	*
Metro Rail	8%	42%	26%	13%	3%	6%	3%

⁶: Other races/ethnicities includes Native Hawaiian or Pacific Islander and other self-reported races/ethnicities.

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

The data on the following page represents all riders who gave responses to fare type and ethnicity. Compared to system-wide percentages, minority riders are slightly more likely to use cash payment and slightly less likely to use monthly passes. Otherwise, fare type usage by minority riders is closely aligned with system-wide statistics. Minority customers are slightly less likely to purchase fares on a smartphone app or at a store outlet than White/Caucasian customers, and slightly more likely to purchase fares at a ticket vending machine.

Fare Type	White (Non-Hispanic)	People of Color and/or Hispanic	Systemwide Total
Cash	35%	40%	38%
Monthly pass	33%	22%	26%
Day pass	17%	17%	17%
Single trip ticket	4%	6%	5%
Student pass	1%	7%	5%
30-day pass	5%	4%	4%
7-day pass	2%	3%	3%
University pass	1%	1%	1%
Fare-free zone (rail only)	<1%	<1%	<1%
Paratransit/disability pass	<1%	<1%	<1%
Senior fare	<1%	<1%	<1%
Half fare pass	<1%	<1%	<1%
NFTA work pass	1%	0%	<1%
Other	1%	1%	1%

Fare Purchase Method	White	People of Color and/or Hispanic	Systemwide Total
On the bus	44%	44%	44%
Smart phone app	15%	13%	13%
Store outlet	14%	12%	13%
Ticket vending machine	9%	11%	10%
Online purchase	7%	6%	6%
NFTA cash office	4%	4%	4%
University	2%	4%	3%
High school	<1%	5%	3%
Employer / Metro Advantage	5%	2%	3%

Fare Type	White	People of Color and/or Hispanic	Systemwide Total
Full fare	80%	84%	83%
Senior/disabled/Medicare fare	20%	16%	17%

Fare Usage by Income

Almost two thirds of all survey respondents used one of two fare types – cash or monthly passes. As income level decreases, NFTA riders are more likely to use cash payment on the bus. Low-income riders are generally less likely to purchase tickets on smart phones or online compared to passengers with higher incomes. Passengers with incomes between \$5,000 and \$15,000 had the highest percentage of reduced fare payment of all income brackets.

Fare Type	System	< \$5,000	\$5,000 - \$9,999	\$10,000 - \$14,999	\$15,000 - \$24,999	\$25,000 - \$34,999	\$35,000 - \$49,999	\$50,000 - \$74,999	\$75,000 - \$99,999	\$100,000 or more
Cash		46%	43%	36%	38%	33%	36%	35%	31%	29%
Monthly Pass		22%	23%	28%	28%	27%	33%	30%	20%	17%
Day Pass		17%	22%	18%	19%	15%	15%	13%	5%	17%
Single Trip		4%	3%	4%	3%	9%	4%	8%	13%	15%
Student Pass		3%	3%	2%	2%	4%	3%	0%	17%	7%
30-Day Pass		5%	2%	6%	4%	4%	2%	7%	4%	6%
7-Day Pass		1%	3%	3%	4%	5%	2%	<1%	9%	0%
University Pass		1%	1%	1%	<1%	1%	1%	2%	0%	0%
Fare-Free (Rail)		1%	0%	0%	0%	0%	2%	0%	0%	0%
Paratransit Pass		0%	0%	0%	1%	0%	1%	0%	0%	0%
Senior Fare		<1%	<1%	0%	<1%	1%	0%	0%	0%	2%
Half Fare Pass		1%	0%	0%	0%	0%	0%	1%	0%	0%
NFTA Work Pass		0%	0%	0%	0%	<1%	0%	<1%	0%	6%
Other		0%	0%	1%	<1%	1%	0%	3%	0%	0%

Fare Purchase Method	System	< \$5,000	\$5,000 - \$9,999	\$10,000 - \$14,999	\$15,000 - \$24,999	\$25,000 - \$34,999	\$35,000 - \$49,999	\$50,000 - \$74,999	\$75,000 - \$99,999	\$100,000 or more
On the bus		47%	55%	42%	44%	36%	38%	37%	34%	31%
Smart phone app		7%	9%	15%	14%	20%	13%	15%	25%	25%
Store outlet		12%	9%	16%	13%	14%	14%	15%	3%	1%
Ticket vending machine		13%	8%	9%	11%	8%	14%	7%	0%	11%
Online Purchase		6%	3%	5%	7%	8%	6%	15%	12%	1%
NFTA Cash Office		4%	4%	4%	3%	3%	5%	5%	<1%	8%
University		3%	2%	3%	2%	5%	3%	2%	0%	6%
High School		3%	3%	2%	3%	3%	4%	3%	15%	12%
Employer / Metro Advantage		3%	3%	1%	3%	3%	4%	3%	15%	12%
Social Services		3%	5%	5%	2%	2%	1%	1%	0%	0%

Fare Type	System	< \$5,000	\$5,000 - \$9,999	\$10,000 - \$14,999	\$15,000 - \$24,999	\$25,000 - \$34,999	\$35,000 - \$49,999	\$50,000 - \$74,999	\$75,000 - \$99,999	\$100,000 or more
Full Fare		83%	73%	71%	80%	89%	89%	89%	100%	80%
Senior/Disabled /Medicare fare		17%	27%	29%	20%	11%	11%	11%	0%	20%

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 census block groups in the NFTA Metro service area was 25.8%. The total number of Census block groups that exceed the average minority population percentage is 330.

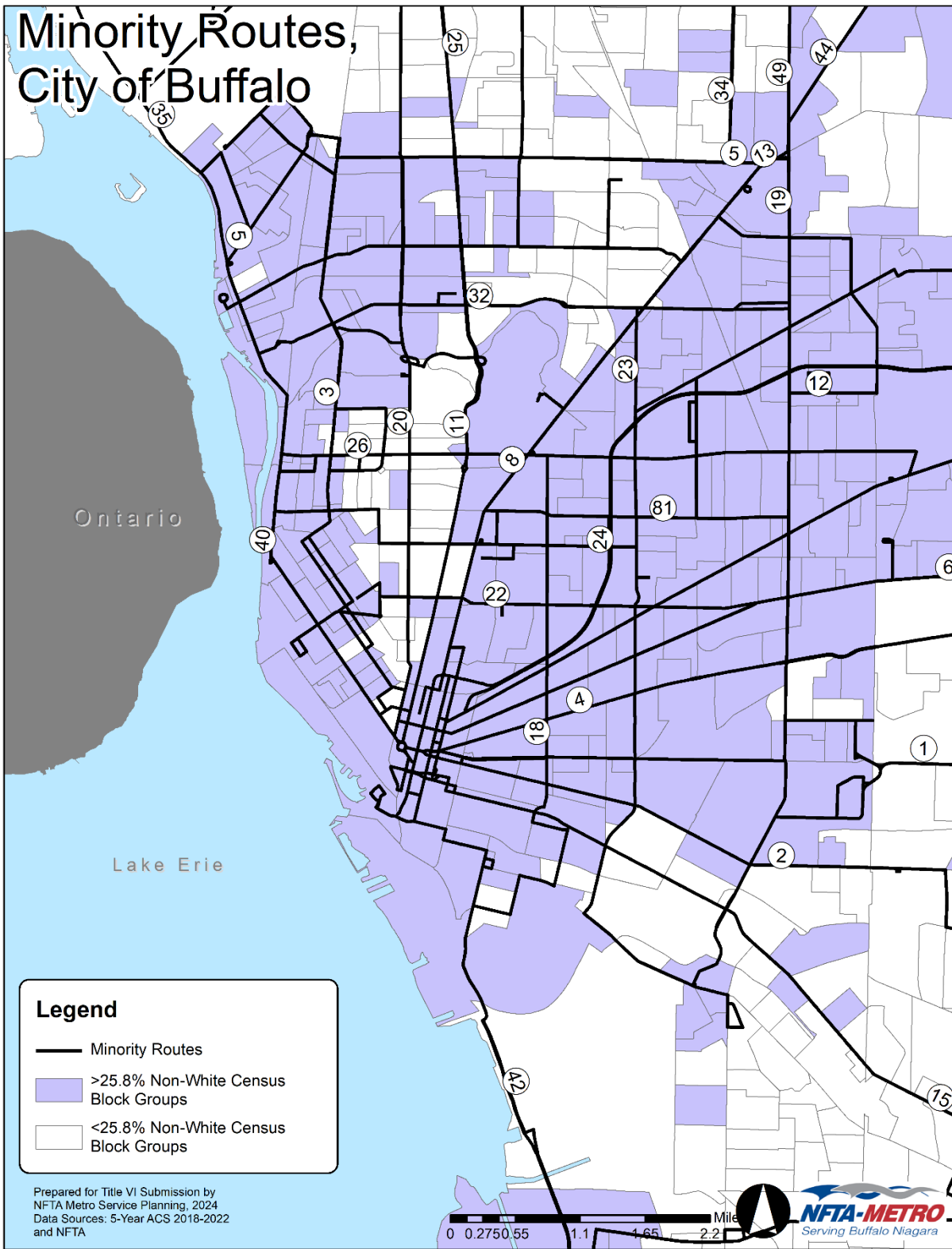
A GIS model was then created that calculates the percentage of revenue miles that fall within these census block groups for each route in the system. Any route whose percentage of revenue miles in minority census block groups exceeds 1/3 (33.3%) was given a minority route designation, with some exceptions. 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. Of the 54 routes in the NFTA Metro system, 30 routes (55%) are minority routes based on the definition above. This table is followed by two maps showing minority routes in the City of Buffalo and City of Niagara Falls respectively, as well as minority census blocks in each region.

All of the NFTA’s most frequent services – Metro Rail and Frequent bus routes – as well as a majority of Standard bus routes are minority routes. Trolley and School routes were designated as non-minority due to their seasonal nature, and many suburban express trips only operate in minority census block groups on highways to and from downtown.

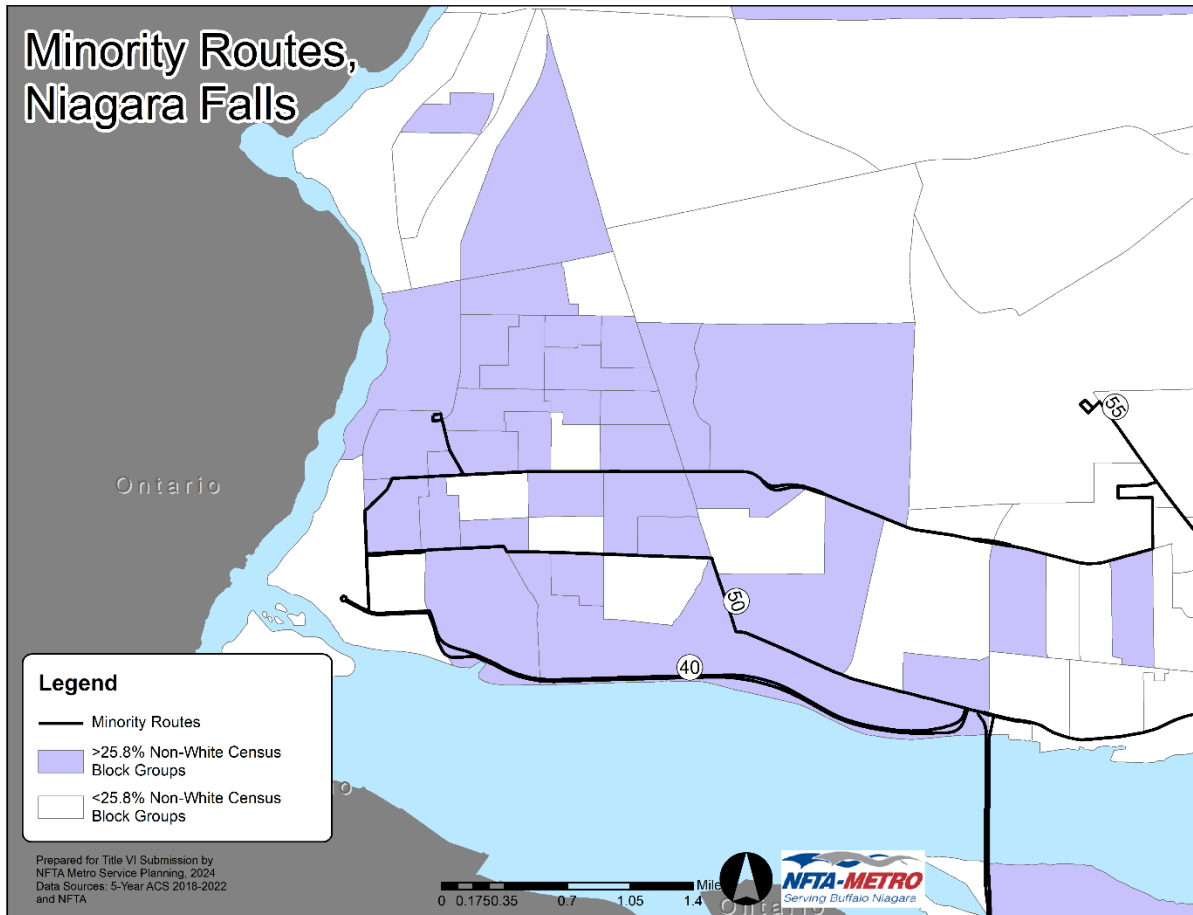
Route Number	Route Name	Route Type	Percent within Minority Block Groups	Minority Route designation	Explanation (if needed)
81	East Side Express	Express	100.00%	Minority	
13	Kensington	Frequent	99.99%	Minority	
12	Utica	Frequent	93.49%	Minority	
5	Niagara-Kenmore	Frequent	93.27%	Minority	
8	Main	Standard	92.55%	Minority	
145	Metro Rail	Metro Rail	92.50%	Minority	
19	Bailey	Frequent	89.10%	Minority	
3	Grant	Frequent	88.09%	Minority	
102	Bailey East	School	86.71%	Non-Minority	Seasonal Service - school route
24	Genesee	Frequent	85.64%	Minority	
18	Jefferson	Standard	84.96%	Minority	
4	Broadway	Standard	80.68%	Minority	
22	Porter-Best	Standard	76.58%	Minority	
26	Delavan	Frequent	75.83%	Minority	
110	West-North	School	74.20%	Non-Minority	Seasonal Service - school route
23	Fillmore-Hertel	Frequent	73.22%	Minority	
1	William	Standard	65.61%	Minority	
6	Sycamore	Standard	64.62%	Minority	
104	South-Central	School	63.49%	Non-Minority	Seasonal Service - school route
61	Tonawanda Express	Express	62.98%	Non-Minority	Suburban Express - few stops in Minority Area
111	South Michigan	School	55.12%	Non-Minority	Seasonal Service - school route
40	Buffalo-Niagara Falls	Standard	53.02%	Minority	
101	North-South	School	50.71%	Non-Minority	Seasonal Service - school route
35	Sheridan	Standard	50.02%	Minority	
32	Amherst	Frequent	49.37%	Minority	
55	Pine Avenue	Standard	47.10%	Minority	
155	Niagara Falls Trolley	Standard	46.32%	Non-Minority	Seasonal Service - Hotels to Downtown/Falls
11	Colvin	Standard	46.26%	Minority	
44	Lockport	Standard	45.73%	Minority	
60	Niagara Falls Express	Express	45.68%	Non-Minority	Suburban Express - few stops in Minority Area
106	South-Suburban	School	45.32%	Non-Minority	Seasonal Service - school route
66	Williamsville Express	Express	44.95%	Non-Minority	Suburban Express - few stops in Minority Area
20	Elmwood	Frequent	44.07%	Minority	
34	Niagara Falls Blvd	Standard	41.86%	Minority	
49	East Amherst	Standard	41.56%	Minority	
50	Main-Niagara	Standard	40.98%	Minority	
2	Clinton	Standard	36.07%	Minority	
15	Seneca	Standard	35.80%	Minority	
25	Delaware	Frequent	35.46%	Minority	
42	Lackawanna	Standard	33.99%	Minority	

74	Hamburg Express	Express	32.48%	Non-Minority	< 1/3 of Route in Minority Area
16	South Park	Standard	29.01%	Non-Minority	< 1/3 of Route in Minority Area
69	Lancaster Express	Express	28.58%	Non-Minority	< 1/3 of Route in Minority Area
52	North End Circulator	Standard	27.31%	Non-Minority	< 1/3 of Route in Minority Area
103	East-Suburban	School	26.00%	Non-Minority	< 1/3 of Route in Minority Area
14	Abbott	Standard	25.02%	Non-Minority	< 1/3 of Route in Minority Area
72	Orchard Park Express	Express	21.46%	Non-Minority	< 1/3 of Route in Minority Area
70	East Aurora Express	Express	20.44%	Non-Minority	< 1/3 of Route in Minority Area
76	Lakeshore Express	Express	17.90%	Non-Minority	< 1/3 of Route in Minority Area
48	Williamsville	Standard	15.07%	Non-Minority	< 1/3 of Route in Minority Area
47	Wehrle	Standard	13.80%	Non-Minority	< 1/3 of Route in Minority Area
77	Buffalo-Niagara Falls Express	Express	5.87%	Non-Minority	< 1/3 of Route in Minority Area
64	Lockport Express	Express	5.58%	Non-Minority	< 1/3 of Route in Minority Area
46	Lancaster	Standard	0.00%	Non-Minority	< 1/3 of Route in Minority Area
59	Niagara Falls Airport-NCCC	Standard	0.00%	Non-Minority	< 1/3 of Route in Minority Area

Minority Routes, City of Buffalo



Minority Routes, 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.

The table on the following page shows every NFTA route and how it performs based on the service guidelines. Cells in green meet the standards set in NFTA’s service guidelines, cells in orange do not meet the standards, and cells in grey represent periods when a route does not operate, or refers to data that is not collected.

The following sections describe the performance of NFTA Metro routes based each of the agency’s service standards and guidelines. Each section will begin with a brief explanation of the standard, a summary of analysis by route, and mitigating factors or next steps for unmet standards.

Route Number	Route Name	Route Type	Minority Route Designation	Vehicle Load (Peak)	Vehicle Load (Off-Peak)	Vehicle Headway (Peak)	Vehicle Headway (Off-Peak)	On-Time Performance	Bus Stop Spacing (ft)	Service Span - Weekday	Service Span - Saturday	Service Span - Sunday
1	William	Standard	Minority	23%	17%	30	30	83.0%	733	4:47 AM-10:37 PM	7:06 AM-10:33 PM	7:38 AM-8:32 PM
2	Clinton	Standard	Minority	22%	18%	30	30	83.1%	778	5:10 AM-11:43 PM	6:25 AM-11:09 PM	7:50 AM-9:09 PM
3	Grant	Frequent	Minority	35%	27%	15	20	84.0%	766	4:37 AM-1:17 AM	6:10 AM-1:06 AM	7:01 AM-11:35 PM
4	Broadway	Standard	Minority	25%	26%	20	30	83.7%	752	4:56 AM-12:34 AM	6:21 AM-11:52 PM	8:10 AM-12:02 AM
5	Niagara	Frequent	Minority	32%	28%	15	20	85.3%	745	4:43 AM-1:29 AM	6:00 AM-1:00 AM	7:00 AM-12:07 AM
6	Sycamore	Standard	Minority	24%	23%	25	30	80.4%	816	4:43 AM-1:17 AM	5:57 AM-12:12 AM	8:00 AM-11:45 PM
8	Main	Standard	Minority	19%	17%	30	30	81.8%	724	5:15 AM-11:49 PM	6:15 AM-10:31 PM	6:00 AM-9:47 PM
11	Colvin	Standard	Minority	24%	16%	30	60	85.3%	788	5:11 AM-10:45 PM	7:41 AM-7:02 PM	7:52 AM-7:23 PM
12	Utica	Frequent	Minority	31%	25%	15	20	76.9%	728	4:50 AM-1:21 AM	5:50 AM-12:51 AM	6:10 AM-11:50 PM
13	Kensington	Frequent	Minority	25%	20%	25	30	83.6%	807	4:55 AM-12:43 AM	5:40 AM-12:43 AM	7:45 AM-11:10 PM
14	Abbott	Standard	Non-Minority	20%	17%	25	30	83.9%	910	5:20 AM-12:33 AM	6:20 AM-12:28 AM	6:35 AM-10:47 PM
15	Seneca	Standard	Minority	24%	19%	25	30	88.9%	816	4:56 AM-12:45 AM	6:15 AM-12:25 AM	6:56 AM-9:36 PM
16	South Park	Standard	Non-Minority	37%	24%	25	30	79.9%	882	4:57 AM-1:01 AM	5:58 AM-11:47 PM	6:05 AM-11:17 PM
18	Jefferson	Standard	Minority	13%	12%	30	60	85.5%	732	5:50 AM-10:11 PM	8:00 AM-6:51 PM	8:15 AM-7:00 PM
19	Bailey	Frequent	Minority	33%	26%	15	20	85.5%	831	5:00 AM-1:05 AM	6:00 AM-12:10 AM	7:23 AM-10:52 PM
20	Elmwood	Frequent	Minority	34%	25%	15	20	83.3%	714	4:56 AM-12:46 AM	6:12 AM-12:56 AM	6:12 AM-11:39 PM
22	Porter/Best	Standard	Minority	22%	20%	25	60	81.6%	661	6:00 AM-10:19 PM	7:45 AM-7:58 PM	8:00 AM-7:12 PM
23	Fillmore/Hertel	Frequent	Minority	29%	26%	15	20	82.0%	776	5:00 AM-12:30 AM	6:00 AM-12:35 AM	7:50 AM-10:46 PM
24	Genesee	Frequent	Minority	20%	18%	20	30	83.1%	1,147	4:47 AM-12:30 AM	5:30 AM-1:00 AM	5:36 AM-12:30 AM
25	Delaware	Frequent	Minority	28%	24%	25	30	85.7%	771	5:05 AM-1:18 AM	6:15 AM-12:10 AM	7:18 AM-11:08 PM
26	Delavan	Frequent	Minority	26%	20%	25	30	84.4%	782	5:40 AM-11:11 PM	6:00 AM-8:38 PM	6:20 AM-8:45 PM
32	Amherst	Frequent	Minority	27%	24%	25	30	80.0%	898	5:35 AM-1:16 AM	7:05 AM-12:36 AM	7:40 AM-10:47 PM
34	N. Falls Blvd.	Standard	Minority	24%	26%	25	30	83.0%	1,050	5:56 AM-10:31 PM	8:02 AM-11:08 PM	8:13 AM-10:32 PM
35	Sheridan	Standard	Minority	15%	14%	45	60	82.6%	1,064	5:56 AM-10:33 PM	7:40 AM-8:02 PM	7:40 AM-8:04 PM
40	Grand Island	Standard	Minority	28%	23%	35	35	81.3%	1,323	5:03 AM-1:39 AM	5:34 AM-1:21 AM	6:00 AM-1:28 AM
42	Lackawanna	Standard	Non-Minority	18%	15%	55	75	81.5%	1,209	6:00 AM-12:17 AM	8:05 AM-10:43 PM	8:00 AM-8:50 PM
44	Lockport	Standard	Non-Minority	13%	13%	45	75	78.5%	1,482	5:30 AM-11:45 PM	6:25 AM-11:39 PM	6:25 AM-11:03 PM
46	Lancaster	Standard	Non-Minority	21%	19%	50	60	83.7%	1,525	5:34 AM-11:29 PM	8:35 AM-11:32 PM	8:54 AM-11:26 PM
47	Youngs Road	Standard	Non-Minority	12%	9%	45	120	79.3%	1,209	6:10 AM-11:35 PM		
48	Williamsville	Standard	Non-Minority	16%	15%	35	60	81.6%	977	5:55 AM-11:45 PM	8:10 AM-9:40 PM	8:10 AM-8:35 PM
49	Millard Suburban	Standard	Minority	17%	14%	80	90	80.6%	1,651	6:10 AM-5:56 PM		
50	Main/Niagara	Standard	Minority	14%	14%	50	60	80.8%	827	5:05 AM-12:22 AM	6:03 AM-11:55 PM	6:03 AM-11:56 PM
52	Hyde Park	Standard	Minority	12%	12%	60	120	81.9%	805	5:04 AM-11:05 PM	8:16 AM-5:17 PM	
55	Pine Avenue	Standard	Non-Minority	17%	18%	30	30	80.1%	1,056	5:07 AM-12:55 AM	6:36 AM-10:03 PM	8:05 AM-9:59 PM
60	Niagara Falls Express	Suburban Express	Non-Minority	13%		Peak Hours		68.6%	4,113	AM/PM Peaks		
61	Tonawanda Express	Suburban Express	Non-Minority	6%		Peak Hours		75.6%	2,904	AM/PM Peaks		
64	Lockport Express	Suburban Express	Non-Minority	12%		Peak Hours		62.5%	8,419	AM/PM Peaks		
66	Williamsville Express	Suburban Express	Non-Minority	11%		Peak Hours		62.3%	2,427	AM/PM Peaks		
67	Cleveland Hill Express	Suburban Express	Minority	12%		Peak Hours		62.0%	1,229	AM/PM Peaks		
69	Lancaster Express	Suburban Express	Non-Minority	15%		Peak Hours		72.1%	2,420	AM/PM Peaks		
70	East Aurora Express	Suburban Express	Non-Minority	8%		Peak Hours		74.4%	2,389	AM/PM Peaks		
72	Orchard Park Express	Suburban Express	Non-Minority	6%		Peak Hours		61.9%	4,167	AM/PM Peaks		
74	Boston Express	Suburban Express	Non-Minority	8%		Peak Hours		73.6%	1,641	AM/PM Peaks		
76	Lotus Bay Express	Suburban Express	Non-Minority	15%		Peak Hours		69.1%	2,158	AM/PM Peaks		
81	East Side Express	Suburban Express	Minority	8%		Peak Hours		81.7%	925	AM/PM Peaks		
101	No.-South	School	Non-Minority	63%		Peak Hours		No data - School	787	AM/PM Peaks		
102	Bailey	School	Non-Minority	50%		Peak Hours		No data - School	1,420	AM/PM Peaks		
103	E.-Suburban	School	Non-Minority	4%		Peak Hours		No data - School	1,324	AM/PM Peaks		
104	So. Central	School	Non-Minority	97%		Peak Hours		No data - School	856	AM/PM Peaks		
106	So.-Suburban	School	Non-Minority	42%		Peak Hours		No data - School	1,080	AM/PM Peaks		
110	West-North	School	Non-Minority	26%		Peak Hours		No data - School	710	AM/PM Peaks		
111	So.-Michigan	School	Non-Minority	16%		Peak Hours		No data - School	1,086	AM/PM Peaks		
145	Metro Rail	Metro Rail	Minority	5%	5%	12	15	92.3%	2,746	5:10 AM-12:48 AM	7:05 AM-12:49 AM	8:00 AM-11:49 PM
155	Niagara Falls Trolley	Standard	Non-Minority	13%	10%	60	60	78.4%	1,723	9:00 AM-12:46 AM	9:00 AM-12:46 AM	9:00 AM-12:46 AM

Service Coverage



Coverage refers to the geographic extent of fixed route transit service within NFTA Metro's service area. Transit systems are not able to provide transit service to every potential rider who needs or wants service; universal service would be prohibitively expensive. While transit planning best practice is to design transit service in areas with density, walkability, continuity, and linear routing, service to areas that do not have these characteristics is sometimes necessary to maintain access and connectivity in the region.

NFTA recognizes that different neighborhoods have differing transit needs that are tied to income, poverty status, race/ethnicity, and automobile access, and creates an annual Transit Need Index to identify where these needs exist. NFTA's Transit Need Index incorporates five factors – median income, minority population density, economically disadvantaged household density, zero car household density, and low-income job density. NFTA's service guidelines in chapter nine contain more details about how the Transit Need Index was developed. It is the agency's goal to provide service to areas determined to have a High or Medium-High transit need wherever possible.

The map on the following page categorizes all census block groups in the NFTA service area into four categories of transit need: Low, Medium-Low, Medium-High, and High. This is overlaid by a half-mile buffer of NFTA transit routes to show how well they serve areas with high transit need. All block groups with High or Medium-High transit need are within a half-mile or less of current NFTA service.





Equity Index

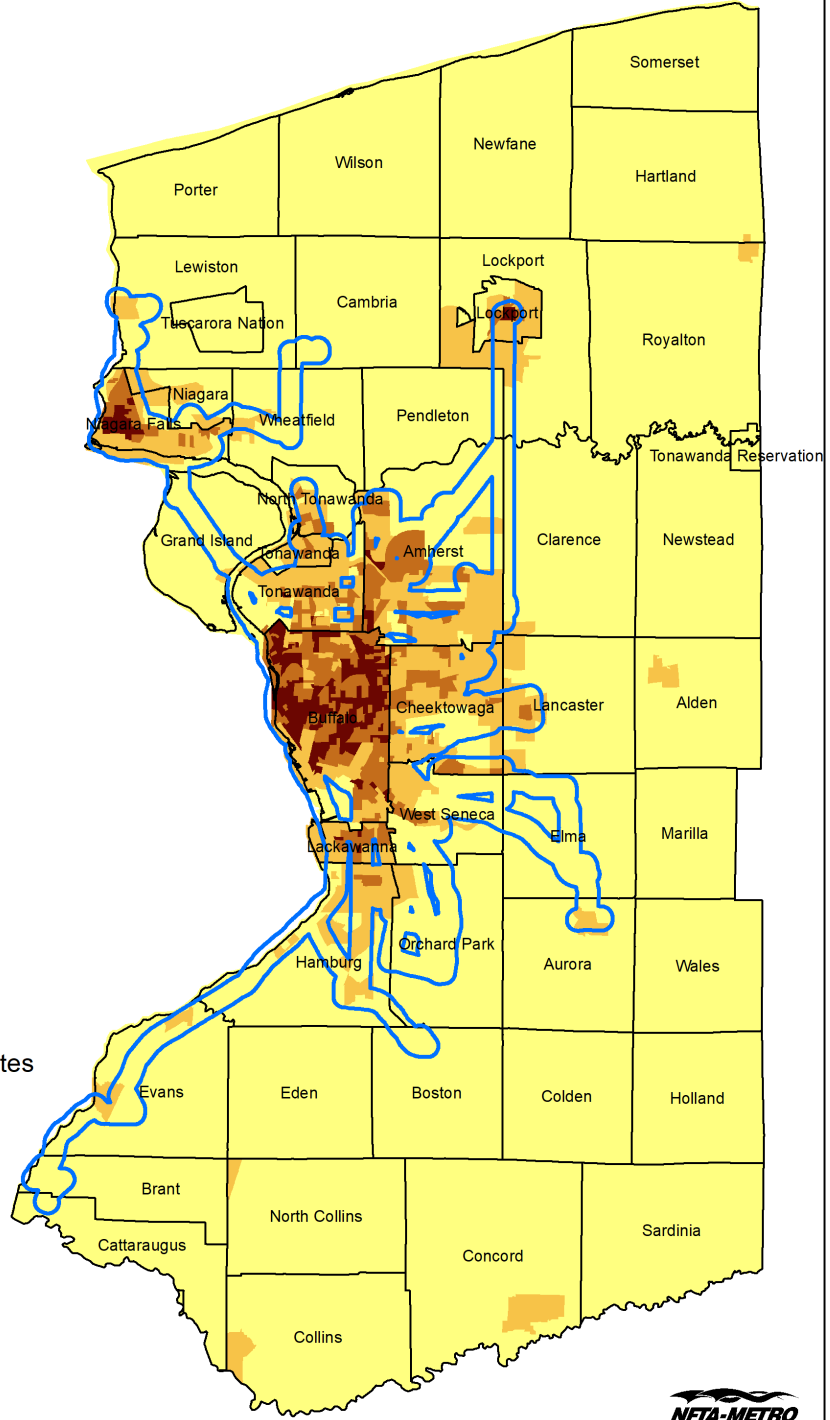
Legend

-  Half Mile Buffer of Routes
-  Municipal Boundaries

Equity Index

Transit Need

-  Low
-  Medium-Low
-  Medium-High
-  High



Service Capacity

Service capacity is the number of riders that NFTA Metro vehicles can safely accommodate. NFTA Metro has identified the acceptable amount of passenger load to meet ridership demands for a given service tier. Riders can be expected to stand for up to 15 minutes of the duration of their trip without finding a seat. Routes that are consistently and significantly over-capacity may warrant larger capacity vehicles and/or higher service frequency to meet demand. During off-peak hours, riders may be more likely to sit for the duration of their trip.

- A typical 40-foot bus has a seated capacity (100%) of 38 passengers.
- A typical Metro Rail car has a capacity of 120 passengers; Metro Rail typically operates 3 cars per train.

Maximum Passenger Load Guidelines

Route Type	Peak Hours	Off-Peak Hours
<i>Metro Rail</i>	150%	130%
<i>Bus Rapid Transit</i>	140%	120%
<i>Frequent</i>	140%	120%
<i>Standard</i>	120%	110%
<i>Limited Stop</i>	140%	120%
<i>Suburban Express</i>	100%	N/A
<i>Local Express</i>	100%	N/A
<i>On-Demand Microtransit</i>	100%	100%

Analysis of NFTA routes using automatic passenger counting (APC) data shows that every route has met service capacity guidelines for all service day types during the most recent complete schedule period (3/7/21-6/12/21).

Service Frequency

Service frequency is the number of vehicles on a route within a time period, such as buses (or trips) per hour. NFTA Metro provides transit service that balances regular, high-ridership service with routes designed to provide access to activity and job centers, medical services, educational facilities, and other key destinations throughout the Buffalo-Niagara area. For some routes, higher frequencies are offered during peak times to accommodate periods of high ridership, compared to nights and weekends.

Service Frequency Standards (headways)

Core Service Tier	Peak	Off-Peak
Metro Rail	10-12 min	15-20 min
Bus Rapid Transit	10-12 min	15-20 min
Frequent	10-15 min	20-30 min
Standard	30 min	60 min

A majority, but not all route frequencies currently meet NFTA standards. Ten minority routes and six non-minority routes have lower peak frequencies, while two minority routes and four non-minority routes have lower off-peak frequencies. Much of the ability to maintain near-normal service levels was due to minor adjustments of peak frequencies on high-frequency routes (most of which are minority

routes). As ridership moves toward pre-pandemic levels, NFTA will consider increasing frequencies on these routes to better match the service guidelines.

On-Time Performance

On-time performance is a measure of how frequently a transit vehicle arrives to its scheduled timepoints within the acceptable window of time. NFTA Metro considers a service to be “on-time” if it departs from its scheduled stop up to two (2) minutes early, or up to five (5) minutes late from the designated time. Service reliability ensures that trips that are scheduled are serviced.

- To be in compliance with NFTA Metro’s service standards, 84% of transit vehicles must depart from a time point within the on-time range, or **higher than the previous year’s average on-time performance by service tier.**

Analysis of on-time performance by route using CAD/AVL data from the 2020-2021 fiscal year shows that most routes did not meet the standards. Unpredictable ridership levels during the pandemic caused difficulties for operators maintaining scheduled times, which are based off of pre-pandemic ridership levels. NFTA scheduling staff adjusted running times of routes in late 2020 when ridership stabilized, which helped alleviate this issue somewhat. Of the ten routes that met the standard, nine are minority routes. Average on-time performance was 82.5% for minority routes and 74.8% for non-minority routes. On-time performance data for school routes is not gathered, as they may leave early from schools whenever the bus is full.

Stop Spacing

In most cases, NFTA Metro determines stop spacing by geography. Downtown Buffalo is the most dense, walkable, and accessible district of the service area. It also experiences the most traffic congestion, traffic lights, and highest number of transit transfers. For these reasons, stop spacing can be spread out to allow for riders to utilize alternative forms of transportation within Downtown, while also maintaining accessibility and efficiency of transit vehicles.

Higher-Density neighborhoods contain the most transit riders and have the highest residential density in the area. These areas are often served by more frequent bus routes that must maintain speed and time efficiency for transit to remain a viable transportation option. Higher-density municipalities have higher walkability and accessibility than lower-density municipalities. Therefore, they have fewer stops per mile than routes in less dense areas due to more potential for delay. Less stops allows the bus to move quickly through traffic at reliable time intervals.

In the outer-ring suburbs and rural areas of the service area, there are fewer riders and infrastructure is lacking for pedestrians. Because of these contextual features, it is important to be able to get as close to the destination as possible, requiring the highest stops per mile. However, speed efficiency is not lost due to a lower rate of ridership at these stops. The additional stops do not slow the buses and riders’ time on-vehicle is not significantly affected.

Geographic Context Dependent Service	Suggested Average Spacing (stops per mile)
Downtown Buffalo	1,200 ft (4)
Higher-Density Municipality	950 ft (5)
Lower-Density Municipality	700 ft (7)
Independent Services*	
<i>Bus Rapid Transit</i>	$\frac{3}{4}$ mile (1-2)
<i>Limited Stop</i>	$\frac{3}{4}$ mile (1-2)
<i>Suburban Express</i>	Case-by-case
<i>Local Express</i>	Case-by-case

**independent services are not geographically contextual in all cases and may have wider average stop spacing due to the nature of the service, despite their locations*

Since stop spacing is based on geography rather than service tier, it is difficult to assess on a route level whether standards are being met if it moves through different geography types. From an access standpoint, closer stops increase the likelihood that a route is within walking distance. All frequent routes – all of which are minority routes - and most standard routes have closer average stop spacing than the standard for “higher-density municipality”, which is where most minority census block groups are. NFTA Metro is currently undergoing a bus stop balancing effort to better match system stop spacing to its newly revised service standards. This will help optimize the relationship between the often opposing characteristics of stop distance and trip speed.

Service Span

Service hours refer to the timespan and number of hours that NFTA Metro is operating vehicles across its various tiers. NFTA Metro operates service year-round, seven days a week, and up to 19 hours a day. Service hours may vary between and among service tiers, and route to route. By maintaining service span, NFTA Metro can be responsive to needs of transit dependent.

Ridership demand may determine a slightly altered service span on an individual route level.

Service Tier	Weekday	Saturday	Sunday
Metro Rail	5:30 AM – 1:00 AM	7:00 AM – 1:00 AM	8:00 AM – 12:00 AM
Bus Rapid Transit	5:30 AM – 1:00 AM	7:00 AM – 1:00 AM	8:00 AM – 12:00 AM
Frequent	5:30 AM – 1:00 AM	6:30 AM – 12:00 AM	7:00 AM – 10:00 PM
Standard	5:30 AM – 12:00 AM	6:30 AM – 12:00 AM	7:00 AM – 10:00 PM
Limited Stop	6:00 AM – 10:00 PM	None	None
Suburban Express	6:30 AM – 9:00 AM	None	None
	4:00 PM – 6:30 PM		
Local Express	6:30 AM – 9:00 AM	None	None
	4:00 PM – 6:30 PM		
On-Demand	5:30 AM – 12:00 AM	TBD	TBD
Microtransit			
Trolley (seasonal)	TBD	TBD	TBD

Routes were found to meet the standard if they met or exceeded the specific service span in the table above, or if they met the duration requirement with slightly different start or end times than listed. Among routes that operate all day on weekdays, 67% of minority routes meet the standards, while only 33% of non-minority routes meet the standards. Minority routes also outperform non-minority routes in meeting these standards on Saturdays (60% compared to 22%) and Sundays (60% compared to 50%).

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.

We have found that after reviewing APC bus assignment data, minority routes are assigned newer buses more frequently than non-minority routes. In the most recent complete schedule period, the average bus age for minority route trips sampled by the APC system was 8.0, while the average for non-minority trips was 9.5. Of the thirty routes with the lowest average bus age, 21 were minority routes. Information on average age of bus assignment by route can be found in the table on the next page.

Frontier bus garage has many of the newest buses, as it is currently the only bus facility that has compressed natural gas (CNG) capabilities. Frontier garage operates all routes on weekends, further ensuring that all routes are assigned newer buses. Furthermore, Cold Spring garage operates the most minority routes and will be receiving the agency's first fleet of electric buses in 2022.

Route Number	Route Name	Route Type	Minority Route Designation	Average Bus Age
35	Sheridan	Standard	Minority	3.7
40	Grand Island	Standard	Minority	3.7
55	Pine Avenue	Standard	Non-Minority	3.7
50	Main/Niagara	Standard	Minority	3.7
5	Niagara	Frequent	Minority	4.0
3	Grant	Frequent	Minority	4.0
52	Hyde Park	Standard	Minority	4.0
60	Niagara Falls Express	Suburban Express	Non-Minority	4.0
20	Elmwood	Frequent	Minority	4.1
25	Delaware	Frequent	Minority	4.1
34	N. Falls Blvd.	Standard	Minority	4.3
110	West-North	School	Non-Minority	4.3
11	Colvin	Standard	Minority	4.4
61	Tonawanda Express	Suburban Express	Non-Minority	5.5
155	Niagara Falls Trolley	Standard	Non-Minority	9.1
64	Lockport Express	Suburban Express	Non-Minority	9.7
1	William	Standard	Minority	9.7
16	South Park	Standard	Non-Minority	9.8
2	Clinton	Standard	Minority	9.8
19	Bailey	Frequent	Minority	9.9
67	Cleveland Hill Express	Suburban Express	Minority	9.9
49	Millard Suburban	Standard	Minority	10.1
23	Fillmore/Hertel	Frequent	Minority	10.1
8	Main	Standard	Minority	10.1
44	Lockport	Standard	Non-Minority	10.2
24	Genesee	Frequent	Minority	10.2
47	Youngs Road	Standard	Non-Minority	10.2
4	Broadway	Standard	Minority	10.2
26	Delavan	Frequent	Minority	10.2
13	Kensington	Frequent	Minority	10.2
22	Porter/Best	Standard	Minority	10.2
14	Abbott	Standard	Non-Minority	10.3
46	Lancaster	Standard	Non-Minority	10.3
48	Williamsville	Standard	Non-Minority	10.5
69	Lancaster Express	Suburban Express	Non-Minority	10.5
32	Amherst	Frequent	Minority	10.5
74	Boston Express	Suburban Express	Non-Minority	10.6
81	East Side Express	Suburban Express	Minority	10.6
18	Jefferson	Standard	Minority	10.6
12	Utica	Frequent	Minority	10.6
42	Lackawanna	Standard	Non-Minority	10.7
6	Sycamore	Standard	Minority	10.8
76	Lotus Bay Express	Suburban Express	Non-Minority	10.9
66	Williamsville Express	Suburban Express	Non-Minority	10.9
15	Seneca	Standard	Minority	11.2
103	E.-Suburban	School	Non-Minority	11.3
72	Orchard Park Express	Suburban Express	Non-Minority	11.7
111	So.-Michigan	School	Non-Minority	11.8
106	So.-Suburban	School	Non-Minority	11.9
70	East Aurora Express	Suburban Express	Non-Minority	12.1
101	No.-South	School	Non-Minority	<i>Did not operate Spring 2021</i>
102	Bailey	School	Non-Minority	<i>Did not operate Spring 2021</i>
104	So. Central	School	Non-Minority	<i>Did not operate Spring 2021</i>

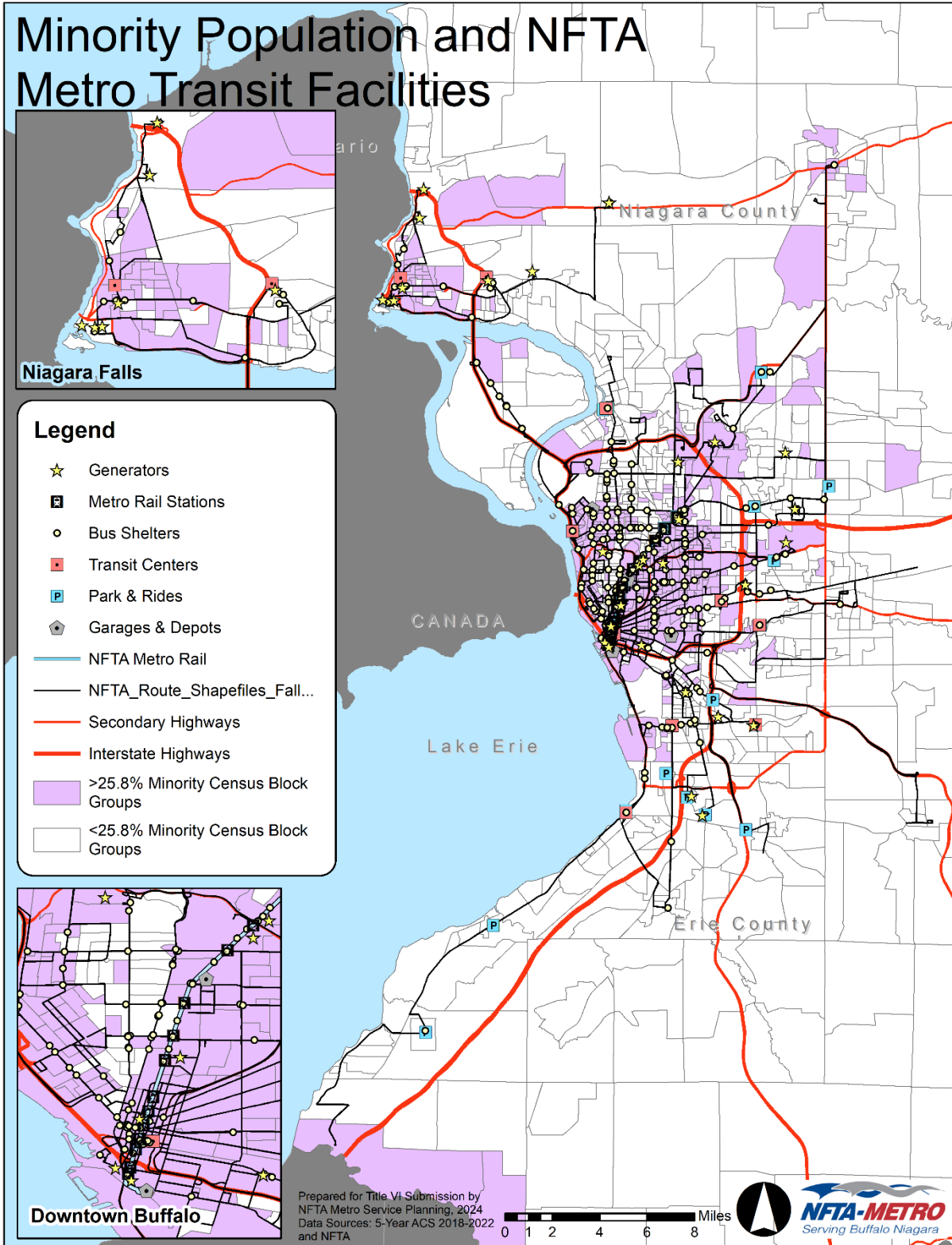
Transit Amenities

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

NFTA's Bus Shelter Placement Policy, adopted in 2007 is included in Chapter 9 of this submission. The goal of the policy is to locate shelters based on need and relevance. 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. The vast majority of shelters and transit centers are located within minority census block groups.

Minority Population and NFTA Metro Transit Facilities



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 4702.1, Chapter IV) for compliance assessment.

By using this methodology, Metro monitors and compares the performance of all its routes based on level of service and quality of service criteria. To facilitate this evaluation, Metro continues to collect data relating to its service standards, such as load factor, vehicle assignment, frequency, and on time performance. These analyses are conducted on a route-by-route basis, thus enabling a system-wide evaluation. The findings of these analyses are used to modify service delivery and 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 May 31, 2019.

On September 23, 2021, 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 Commissioners reviewed and authorized for submission this Title VI Program – 2021 Update.

Figure 15 - Results of the Monitoring Program

Route Type	Average Service Span - Weekday (hours)*	Average Service Frequency - Peak (mins)*	On-Time Performance	Average Stop Spacing (feet)	Average Age of Bus Assignment
Minority	18.7	28	82.50%	944	8
Non-Minority	18.3	41	74.80%	1,955	9.5

*All-day routes only

Board Authorization to Adopt and Submit the Program

Regular Meeting
September 23, 2021

SURFACE:

4. C. (3) Authorization to Adopt Title VI Update and Submission, Metro

RECOMMENDATION: Staff recommends that the Board authorize:

- (1) The adoption of the Niagara Frontier Transportation Authority (NFTA) Title VI Program - 2021 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, 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 - 2021 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 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 - 2021 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 - 2021 Update, in its entirety, in compliance with FTA Circular 4702.1B (October 1, 2012), promptly following the Board's authorization.

FUNDING: No funding required.

SURFACE 4. C. (3)

**Regular Meeting
September 23, 2021**

“RESOLVED, that the Board hereby authorizes the adoption of the Niagara Frontier Transportation Authority (NFTA) Title VI Program - 2021 Update as described above; and

BE IT FURTHER RESOLVED, that the Board hereby authorizes the submission of such updated program to the Federal Transit Administration (FTA);

BE IT FURTHER RESOLVED, that said Agreement shall include such additional terms, conditions and safeguards to the Authority as deemed appropriate by the General Counsel; and

BE IT FURTHER RESOLVED, that the Chief Financial Officer, be and he is hereby authorized to make payments under said Agreement upon certification by the Director, Public Transit, that such payments are in order.”

SURFACE 4. C. (3)

SURFACE:

4. C. (ii) Niagara Frontier Transportation Authority, Acceptance of Surface Transportation Resolutions 4. C. (3) and 4.C. (4)

The Executive Director advised that Items 4. C. (3) and 4.C. (4) have been discussed with the Board of Commissioners of the NFTA, and the Board is unanimously in favor of all subject Resolutions.

Whereupon, it was moved by Commissioner Persico, seconded by Commissioner Hicks, that the following Resolution be adopted:

“**RESOLVED**, that the Resolutions of the Niagara Frontier Transportation Authority, identified as numbers 4. C. (3) and 4.C. (4) and dated September 23, 2021 as set forth herein, be and hereby are accepted and approved in their entirety.

AYES: ROCHE, HUGHES, ANSARI, AUL, BAYNES, HICKS, PERSICO, TUCKER, WILCOX

NOES: NONE

ADOPTED

SURFACE 4. C. (ii)

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 September 2018 (document included in Chapter 4).

Service Changes

At the time of the 2021 Title VI submission, NFTA had planned but not implemented a series of permanent services changes that qualify as a major service change per our policy. NFTA implemented these permanent changes under the Bus Network Improvements initiative. This initiative was approved by the Board of Commissioners on September 23, 2021 and was implemented beginning in December 2021. The plan included 32 route changes, 17 of which constituted a “major service change.” To accompany the plan and be in compliance with Title VI, an analysis was completed and is provided below (this Title VI report was also included as part of the 2021 submission).

The proposed service changes occurred in both Erie and Niagara Counties. However, most of the discontinued routes were in less productive suburban or outlying areas. NFTA maintained service in the more productive, urban core network, where higher concentrations of minority and low-income populations reside. The analysis (embedded below) concluded that two of the 17 recommended major service changes (Routes 29 and 40) would cross the threshold for a disparate impact, and one (Route 40) would cross the threshold for disproportionate burden. NFTA identified mitigating factors that minimize the impacts these service reductions will have on minority and low-income populations. Former Route 29 riders still have access to transit service via Routes 8, 12, 13, 18, 22, 23, 24 and 26 and Metro Rail. For Route 40, half of weekday trips were converted to Route 77 trips, which provides faster trips for Route 40 riders traveling between downtown Buffalo and downtown Niagara Falls. Niagara Street also has high-frequency parallel Route 5 service. Of census block groups

that would have no parallel service beyond hourly Route 40 service (Grand Island and River Road), all are well below the threshold for disparate impact and disproportionate burden, and most are well below the system average.

In addition to the Route 29, the following major service changes were temporarily implemented by NFTA during the Covid-19 crisis (between the 2016 and 2019 Title VI submissions). These do not cross the threshold for a disparate impact or a disproportionate burden.

- Route 75 – express route eliminated due to low ridership
- Route 55B serving Williams Rd and Summit Business Park – variant eliminated due to low ridership
- Route 69A serving Alden, NY – variant eliminated due to low ridership
- Route 7 – eliminated due to low ridership
- Route 54 – eliminated due to low ridership
- Route 68 – express route eliminated due to low ridership
- Route 79 – express route eliminated due to low ridership

The below changes, which were approved in September 2021 and implemented between September 2021 and the end of 2022 went through the process required for a Major Service Change, including the Title VI analysis included below.

As described in the 2021 Title VI submission, public meetings and formal public hearings were held on these proposed changes, including:

- Public meeting - July 13, 2021, at 1:00 pm, Online Meeting
- Public meeting - July 15, 2021, at 5:30 pm, Online Meeting
- Public hearing – August 23, 2021 at 5:30 pm, Online Meeting
- Public hearing – August 24, 2021 at 5:30 pm at NFTA’s Metropolitan Transportation Center (181 Ellicott St, Buffalo NY 14203)
- Public hearing – August 25, 2021 at 5:30 pm at Portage Road Transportation Center (1162 Portage Rd, Niagara Falls NY 14301)

Fare Changes

On November 1, 2024, NFTA fully implemented the MetGo system, a new account based system. A Fare Equity Title VI analysis was conducted in 2016 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. A copy of this 2016 Fare Equity Title VI was included in the 2018 and 2021 Title VI reports and is also provided at the end of this chapter.

In addition to the fare changes approved in 2016, NFTA proposed three additional fare changes at this time that were approved by the Board of Commissioners in September 2021. This was included in the 2021 Title VI Analysis that is included below. Give then nature of these changes, there are no anticipated associated disparate impacts or disproportionate burdens.

2021 Bus Network Improvement Plan Title VI Service and Fare Analysis

2021 Bus Network Improvement Plan Title VI Service and Fare Analysis

July 2021



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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.” As a sub-recipient, NFTA Metro 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 *2021 Bus Network Improvement Plan* service and fare structure recommendations comply with Title VI requirements.

The *2021 Bus Network Improvement 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; and
- Identifying lower cost service delivery options

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 and fare structure 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 that identifies when the adverse effects of a major service change are borne disproportionately by minority or low-income populations, respectively.

Disparate Impact Policy

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

Under NFTA policy, twenty percent (20%) is the threshold above which an impact is deemed “a statistically significant disparity.” This means that if the difference between the low-income population percentage affected by the service or fare change and the low-income population percentage of the overall service area is greater than twenty percent (20%), 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 improve network reliability as well as improve performance to meet NFTA’s Service Standards Policies, the *2021 Bus Network Improvement Plan* proposes to restructure service to better serve current and future market demand and key destinations. The following chart illustrates the near term route level changes.

Table 1: Proposed Service Changes

No.	Route Name	Description
2	Clinton	Change B trip route terminus from closed banking office to a high-demand shopping destination. Introduce new variant to Appletree Business Park to serve new area on Union Road
7	Baynes-Richmond	Discontinue route
8	Main	Extend all trips to end at Main & Jersey Left to serve University Plaza and reduce layover congestion at University Station
11	Colvin	Extend all A trips from City Line to Boulevard Mall. Service new area along Brighton Road.
12	Utica	Change small section of routing from French and Kehr Streets to Fillmore Avenue and Ferry Street to improve safety for operation and customers
14	Abbott	Extend 14A trips to serve shopping and medical destinations on Orchard Park Road
18	Jefferson	Extend route to better serve Old First Ward
19	Bailey	Introduce Limited Stop service from 7am to 7pm to improve trip speed
25	Delaware	Introduce peak Limited Stop service from 7am-10am and 2pm-6pm to improve trip speed
29	Wohlers	Discontinue route
32	Amherst	Remove routing spur to Buffalo State to improve trip speed for passengers along Amherst Street
35	Sheridan	Shift routing into UB North to Sweet Home Road from Flint Road to serve new medical, residential, and hospitality generators
40	Buffalo-Niagara Falls	Allow open-door boarding on Niagara Street to improve customer experience. Shift to hourly service to accommodate new Route 77 express trips.
42	Lackawanna	Serve future industrial center on Dona Street
44	Lockport	Discontinue service to Weinburg Campus
46	Lancaster	Extend some trips to serve Amazon warehouse on Pavement Road
47	Youngs	Discontinue unproductive service to Buffalo Airport. New routing along Harlem Road, Wehrle Drive, and Transit Road to end at Eastern Hills Mall.
49	Millard Fillmore	New routing along Hopkins Road and Maple Road to end at Eastern Hills Mall.

No.	Route Name	Description
50	Main-Niagara	Preserve east-west routing, serve routing north of Portage Road Transportation with new Route 52. Discontinue variant serving Lewiston.
52	North End Circulator	Redesign as a community circulator and operate in a bidirectional loop with 45-minute frequency, rename North End Circulator
54	Military	Discontinue route
55	Pine Ave	Shorten route to serve the most productive section of the route along Pine Avenue between Portage Road Transportation Center and Niagara Falls Transportation Center. No longer service downtown or the Niagara Falls Airport. Service Niagara Falls Airport and NCCC with new route 59.
59	Airport-NCCC	New hourly route between NFTC and NCCC, with service to Niagara Falls Airport and new service to Vantage International Business Park
67	Cleveland Hill	Discontinue route
68	George Urban	Discontinue route
69	Lancaster	Discontinue variant to village of Alden; rename 69 Lancaster
70	East Aurora	Discontinue rural "A" Elma variant due to low ridership, consolidate to faster "C" trips on Thruway
72	Orchard Park	Update "A" trip routing to service the Village of Orchard Park and get directly on the Thruway. Discontinue "P" Variant.
74	Hamburg	Discontinue service to North Boston; service will end in Hamburg. More direct routing to downtown via the Skyway
75	West Seneca	Discontinue route
77	Downtown Buffalo – Downtown Niagara Falls	Introduce weekday hourly express service between downtown Buffalo and downtown Niagara Falls, staggered with local Route 40 trips. Routing entirely on Thruway except to serve Black Rock Riverside Transit Hub.
79	Tonawanda	Discontinue route

Major Service Changes

NFTA defines a “Major Service Change” as a reduction in vehicle revenue hours or service miles of 25 percent or more. Table 2 identifies the route changes 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	Discontinue route
Route 29	Wohlers	Discontinue route
Route 40	Buffalo-Niagara Falls	Shift to hourly service to accommodate new Route 77 express trips
Route 47	Youngs Road	Discontinue routing to Buffalo Airport
Route 49	Millard Fillmore Suburban	Discontinue routing on Sheridan Drive between Hopkins Road and Transit Road
Route 50	Main-Niagara	Discontinue routing north of Portage Road Transportation Center, to be served by Route 52; Discontinue Lewiston “A” Variant
Route 52	Hyde Park	Discontinue service on portions of Hyde Park, Centre, Main and Ontario as part of redesign to circulator model
Route 54	Military	Discontinue route
Route 55	Pine Avenue	Discontinue service to portions of Niagara Falls Blvd and Ward Rd; service to downtown Niagara Falls, NFIA, and NCCC to be served by other routes
Route 67	Cleveland Hill	Discontinue route
Route 68	George Urban	Discontinue route
Route 69	Alden	Discontinue service to Alden
Route 70	East Aurora	Discontinue “A” variant in Elma
Route 72	Orchard Park	Discontinue “A” and “P” variants
Route 74	Hamburg	Discontinue service to North Boston
Route 75	West Seneca	Discontinue route
Route 79	Tonawanda	Discontinue route

Service Equity Analysis

The service equity analysis was performed with Remix, a cloud-based transit planning software. Remix employs geospatial intersection of areas within ¼ mile of stops and census block groups to estimate demographic information. Service Planning staff used Remix to determine percentages of minority and low-income populations by route and for the entire bus network to determine the potential impacts of service changes. Maps 1 and 2 depict the proposed weekday network, current routes with proposed major service reductions, and their proximity to Title VI populations.

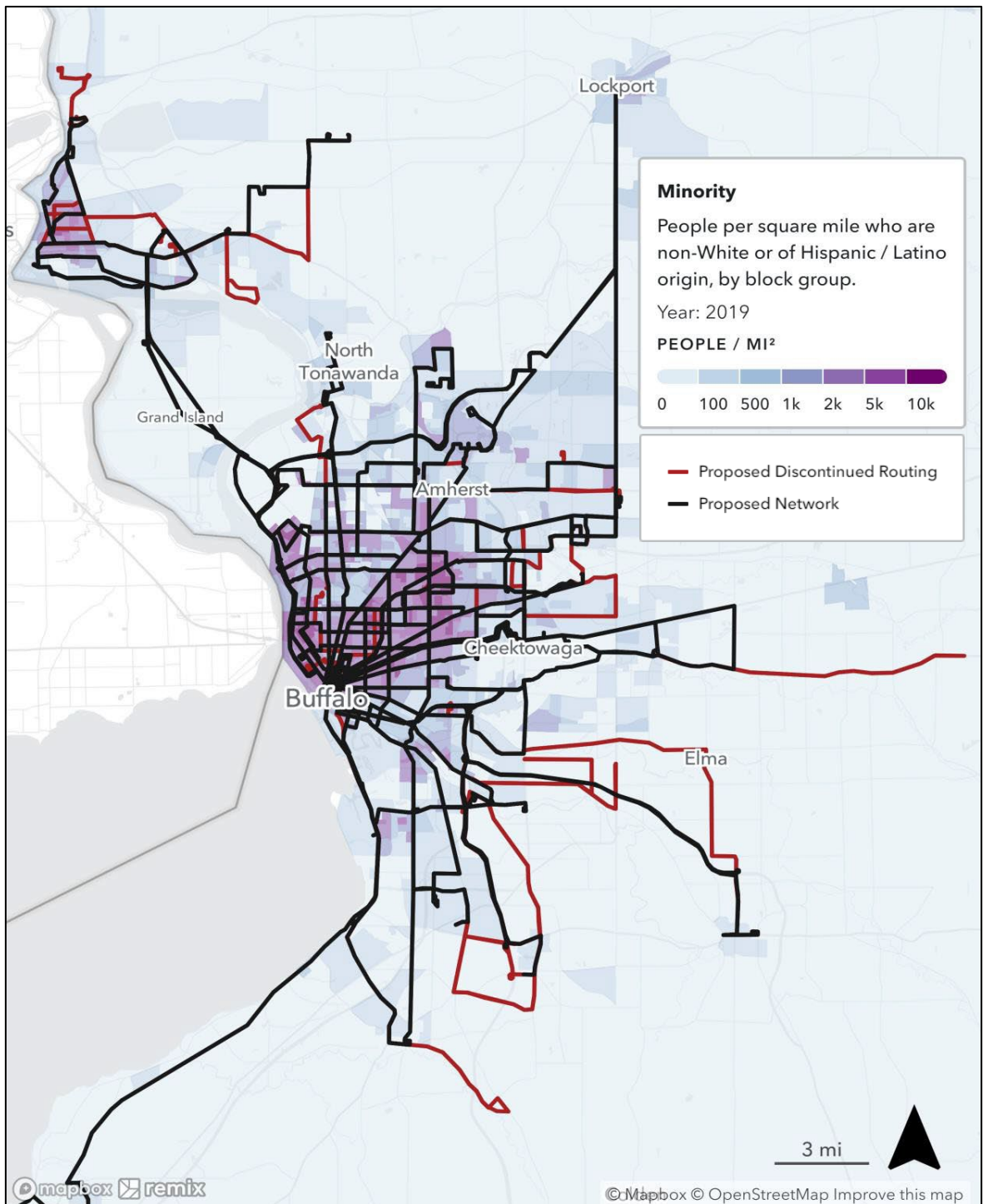
Table 3: Service Area Demographics

Demographics for Entire Bus Network	
Population Served	526,400
Minority Population Served	189,504
In-Poverty Population Served	110,544
Minority %	36%
Poverty %	21%

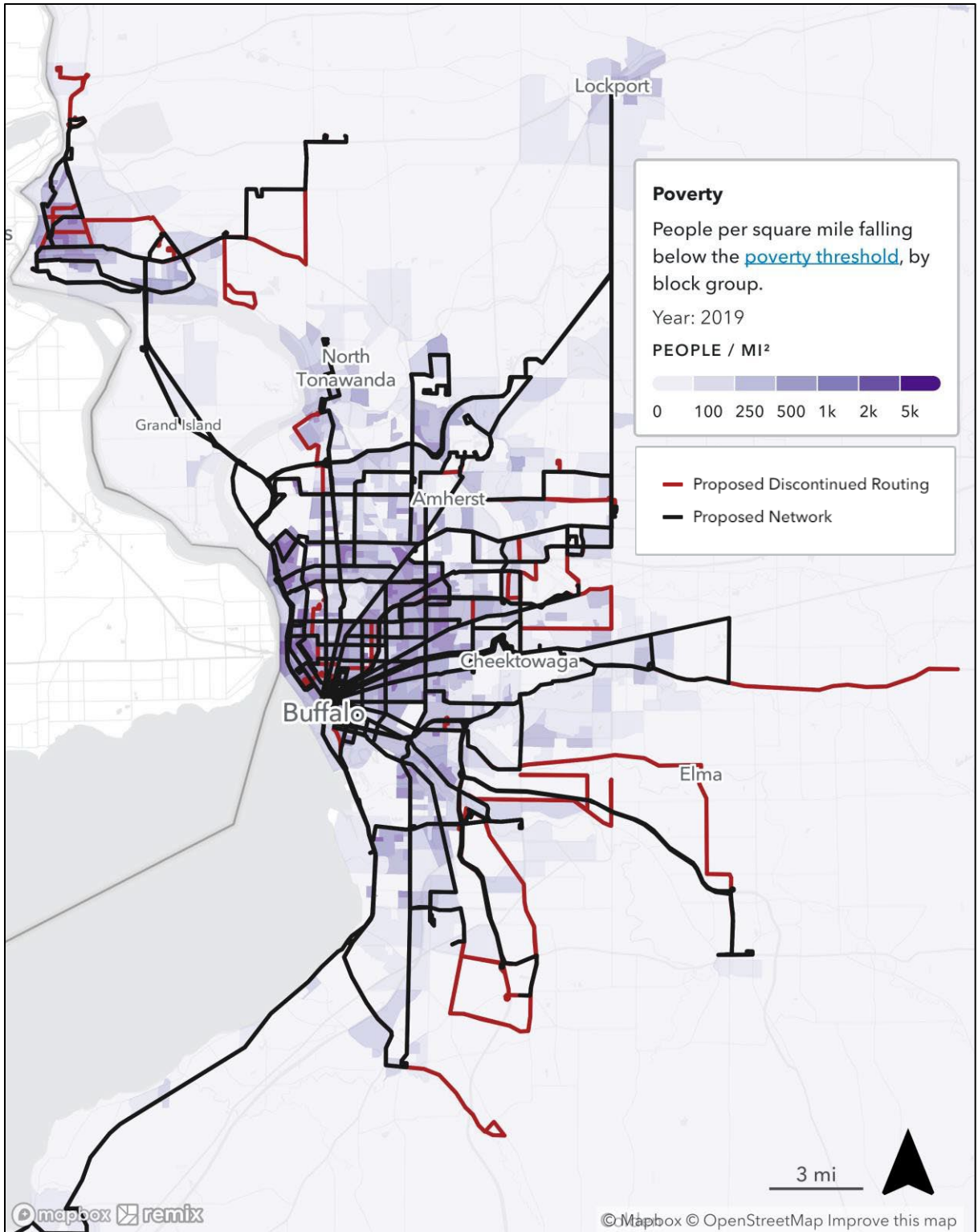
The proposed service changes occur in both Erie and Niagara Counties. However, most of the discontinued routes are located in less productive suburban or outlying areas. NFTA is maintaining service in the more productive, urban core network, where higher concentrations of minority and low-income populations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

The equity analysis analyzed demographic information from the US Census 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.

Map 1: Proposed Network and Census Block Groups by Density of Minority Residents



Map 2: Proposed Network and Census Block Groups by Density of Low-Income Residents



Route Demographics

The table below summarizes the demographic information for routes with proposed major service changes. 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 percentage points greater than the system as a whole. Of the total population served by the current NFTA Metro network, an estimated 36% are minority and 21% are in poverty. Therefore the threshold for disparate impact and disproportionate burden are 56% and 41% respectively.

Among these routes, Routes 29 and 40 cross the thresholds for a disparate impact, and Route 40 crosses the threshold for disproportionate burden, warranting additional review to determine possible service alternatives or mitigation measures.

For all the routes below combined, minority and in-poverty populations make up 34% and 20% of the total population respectively; both figures are below those for the system as a whole.

Table 4: Demographics for Routes with Major Service Changes – Census Data (Remix)

Route	Population	% Minority	% In Poverty
Route 7	22,900	40%	23%
Route 29	21,200	77%	33%
Route 40	25,800	60%	41%
Route 47	14,500	20%	11%
Route 49	17,800	30%	10%
Route 50	22,300	32%	29%
Route 52	18,400	44%	33%
Route 54	8,300	48%	39%
Route 55	18,300	32%	24%
Route 67	27,000	54%	21%
Route 68	17,700	26%	13%
Route 69	11,200	20%	15%
Route 70	13,400	17%	12%
Route 72	9,600	19%	12%
Route 74	14,500	29%	19%
Route 75	17,600	20%	16%
Route 79	24,900	28%	19%
All Routes with Major Service Changes	240,000	34%	20%

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. Routes **29** and **40** had service changes that could result in disparate impacts and disproportionate burdens based on census data.

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 5: Alternatives and Mitigation to Impacted Riders

Route	Mitigating Factor
Route 29	Despite operating in the dense urban core, Route 29 had the second lowest average weekday ridership among local routes in fiscal year 2020. Former Route 29 riders have access to alternate service within ¼ mile via Routes 8, 12, 13, 18, 22, 23, 24 and 26 and Metro Rail.
Route 40	Half of weekday trips would be converted to Route 77 trips, which would provide faster trips for all current Route 40 riders traveling between downtown Buffalo and downtown Niagara Falls. By instituting an open-door policy on Niagara Street, current Route 40 riders would have more freedom to travel in this section. Niagara Street also has high-frequency parallel Route 5 service. Of census block groups that would have no parallel service beyond hourly Route 40 service (Grand Island and River Road), all are well below the threshold for disparate impact and disproportionate burden, and most are well below the system average.

The impacts of major service reductions on minority and low income populations for Routes 29 and 40 will be mitigated by the fact that the majority of riders will still have access to service.

Proposed Fare Changes

NFTA Metro is also proposing some modifications to its fare structure, described below. Given the nature of the changes, there are no anticipated associated disparate impacts or disproportionate burdens.

Proposed Change	Description
<p>31-Day Capping</p>	<p>The approved 2016 fare equity analysis examined fare capping at a daily level. Capping the fare for 31-day rolling periods would extend the best value to users of our system regardless of their ability to pay \$75 upfront, assuring that all users are able to get the best value over a 31-day period. This will create more flexibility as passes do not need to be purchased upfront in order to get the highest value as a customer. As this modification is most beneficial for our most vulnerable customers, there are no foreseen disparate impacts or disproportionate burdens.</p>
<p>Elimination of Enhanced Express Surcharge</p>	<p>NFTA-Metro currently charges a surcharge of \$0.50 on all enhanced express trips. As a result of previous changes in our service delivery guidelines and delivery standards, we no longer have this category of trip. However, we continue to carry forward the surcharge on the 60 Niagara Falls Express and 64 Lockport Express routes. Eliminating the surcharge will create greater equity by standardizing the fare further. Additionally, it will move all express customers to the same fare, regardless of geography. It is not anticipated that eliminating the surcharge on these two routes will have a disproportionate burden or disparate impact.</p>
<p>Premium Fare</p>	<p>All current fixed route NFTA services are deemed to be either local or express and have the same fare structure. There are not currently any dedicated services for special events or seasonal destinations. The addition of premium services is being considered in the future and thus is included as part of the fare equity analysis, even though these services would not be part of the general schedule. A premium service may include access to a sporting event in a location and time not currently served by transit. In order to provide these service, NFTA-Metro is seeking to create a premium service charge of \$5 one-way. These fares are not expected to create disparate impacts or disproportionate burdens because they add new geographies and temporalities for service, while minority and low-income passengers may choose to access these services if they fit their overall needs.</p>

Public Outreach Activities

Upon adoption of the *2021 Bus Network Improvement Plan*, NFTA has conducted and continues 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's service hours or service miles. Given the discussion above, a number of services will fall under this threshold and therefore public hearings will be held.

Conclusion

NFTA has developed the *2021 Bus Network Improvement Plan* to improve core service and create a more sustainable network. The agency developed recommendations based on productivity and financial effectiveness, resulting in significant proposed changes to 31 routes. According to NFTA's Title VI policies, 17 routes would experience a "major service change." NFTA analyzed these changes and concluded 2 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 high levels of transit service. Many of the eliminated routes duplicated other services. Some of the savings from these changes will be reinvested in the core network, where transit can serve a higher number of passengers.

2016 Fare Equity Title VI Analysis

Fare Equity Title VI Analysis

July 2016



Prepared by:



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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. Sucharge 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.

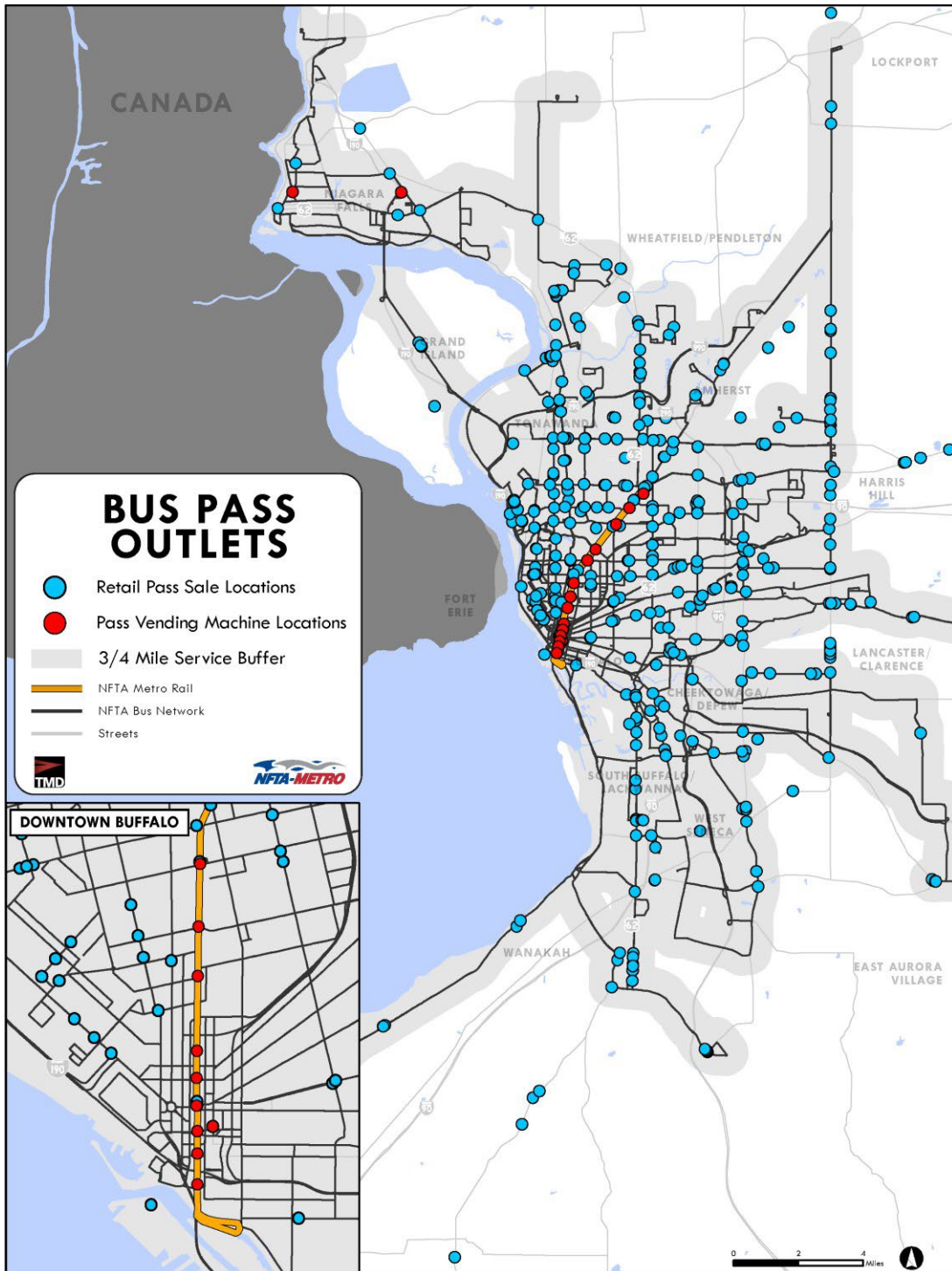
Table 6: Proposed Fare Structure and Points of Purchase

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 ¹		x	x	x	x
Monthly Pass ²		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

¹ Fare product must be loaded onto smart card or mobile device

² 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 levels³.

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 “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.

³ 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 ⁴						
Fare Type	Minority ⁵	Low Income ⁶	Total Riders ⁷	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%
Total	55,461	53,980	98,919	100%	100%	100%

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.

⁴ Based on weighted and expanded 2012 NFTA On-Board Survey

⁵ Passengers who identified a fare type and selected an ethnicity other than just “Caucasian/White”

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

⁷ 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 tracks 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.

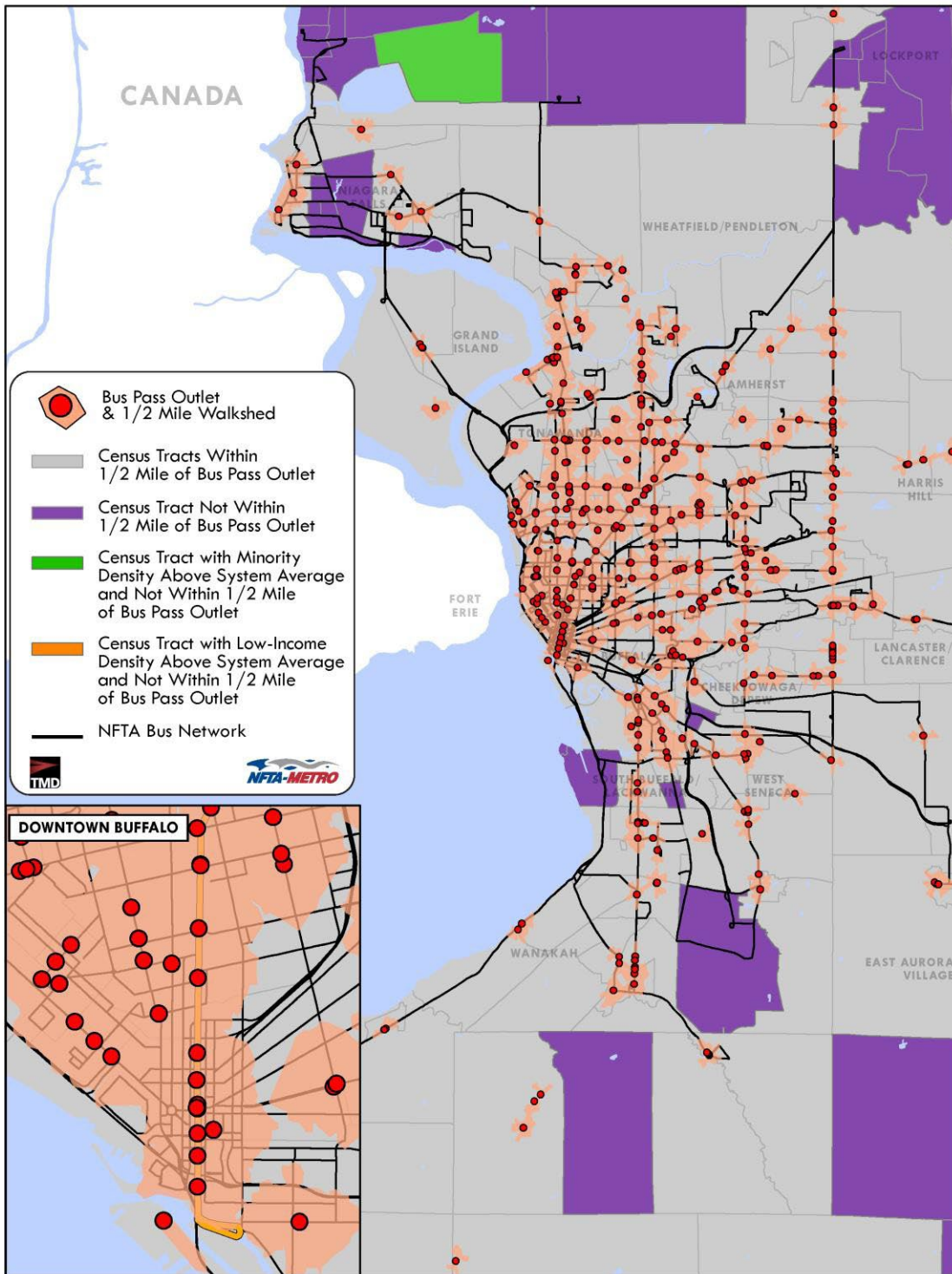
Passengers may incur a one-time fee for new or replacement smart cards. The cost of the fare media is \$2. Smart cards can be purchased at all NFTA Metro Rail Stations, transit centers, third party retail outlets, and NFTA Metro pass sales outlets. To encourage the use of smart cards during the initial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

are not expected to create disparate impacts or disproportionate burdens because they add to the existing set of options. Minority and low-income passengers can choose these new fares if the product fits their needs.

The new Rail Only 31-Day Pass should attract passengers who frequently use Metro Rail as their primary transit route. The current options for these higher volume rail passengers are the round trip rail passes or monthly passes. Table 13 below shows that the usage rates for these fares is similar across minority, low income, and total ridership. The introduction of the new rail only monthly pass should give rail passengers a more cost effective alternative than a general monthly pass.

Table 13: Monthly Pass and Round Trip Rail Passengers

Current Fare Usage by Group						
Fare Type	Minority	Low Income	Total Riders	Minority	Low Income	Total
Monthly Pass	16,478	17,429	31,708	30%	32%	32%
Round Trip Rail	286	305	796	1%	1%	1%

Impacts to Reduced Fare Passengers

Passengers who ride with a reduced fare will face similar changes under the new fare system. Smart cards and mobile ticketing will also be introduced to reduced fare passengers. NFTA will issue a Photo ID smart card to anyone who qualifies for a reduced fare. The Photo ID smart card can be used to pay for reduced fares and fare products. Once a senior/disabled reduced fare account is created, a mobile account can be activated on a smart phone for reduced fares.

Passengers will no longer be to purchase reduced fare day passes on board the bus. However, they will automatically be given the best value and upgraded to a reduced fare day pass after three or more trips in one day when using stored value. They can manage their stored value at a TVM, online, through a mobile application, or at a fare media retail outlet. This change does not result in a disparate impact or a disproportionate burden because the usage rates of reduced fare day passes is similar across low-income, minority, and total ridership.

Passengers who currently use a reduced fare seven-day passes will still be able purchase them at TVMs. They will also have the ability to get these passes online or through their mobile applications as well.

The proposed structure does not impact the current points of purchase for reduced fare monthly and 30-day pass users. Passengers will still be able to purchase passes online, at TVMs, and at retail outlets. They will now be able to purchase their pass using the mobile application as well.

Table 14: Reduced Fare Usage

Reduced Fare Usage by Group ⁸						
Fare Type	Minority ⁹	Low Income ¹⁰	Total ¹¹	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%
Total	4,929	6,683	9,984	100%	100%	100%

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.

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

⁸ Based on weighted and expanded 2012 NFTA On-Board Survey

⁹ Passengers who used “Senior/Disabled” fare, identified a fare type, and selected an ethnicity other than just “Caucasian/White”

¹⁰ Passengers who used “Senior/Disabled” fare, identified a fare type, and stated a household income less than \$24,999

¹¹ Passengers who used “Senior/Disabled” fare and identified a fare type

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	506	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	1,696	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%

Fare Equity Title VI Analysis

Census Tracts	Total Population	Minority Population	Population in Poverty	Percentage Minority	Percentage in Poverty
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%
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%

Fare Equity Title VI Analysis

Census Tracts	Total Population	Minority Population	Population in Poverty	Percentage Minority	Percentage in Poverty
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%
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%

Fare Equity Title VI Analysis

Census Tracts	Total Population	Minority Population	Population in Poverty	Percentage Minority	Percentage in Poverty
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%
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%

Fare Equity Title VI Analysis

Census Tracts	Total Population	Minority Population	Population in Poverty	Percentage Minority	Percentage in Poverty
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	7,643	1,446	271	19%	4%
36029017100	4,850	3,493	2,862	72%	59%
36029017200	2,007	387	424	19%	21%
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%

Fare Equity Title VI Analysis

Census Tracts	Total Population	Minority Population	Population in Poverty	Percentage Minority	Percentage in Poverty
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%
36029012800	2,563	163	316	6%	12%
36029012901	6,247	504	481	8%	8%
36029012902	3,571	61	152	2%	4%
36029013001	3,174	195	283	6%	9%
36029010804	4,047	555	193	14%	5%
36029010805	5,130	245	243	5%	5%
36029010807	5,245	621	438	12%	8%
36029010901	2,213	110	230	5%	10%
36029016900	3,893	1,306	457	34%	12%
36029017000	2,841	2,736	775	96%	27%
36029011000	1,900	299	409	16%	22%
36029011200	6,466	417	329	6%	5%
36029011300	5,309	710	425	13%	8%
36029011600	1,888	122	58	6%	3%
36029011700	4,163	132	373	3%	9%
36029011800	3,485	78	217	2%	6%
36029002702	2,790	2,417	1,408	87%	50%
36029002800	2,147	1,607	813	75%	38%
36029002900	2,269	1,779	956	78%	42%
36029003000	2,714	2,515	1,505	93%	55%
36029003100	1,877	1,814	783	97%	42%
36029003301	3,732	3,597	1,168	96%	31%
36029003302	3,655	3,488	1,392	95%	38%
36029003400	2,428	2,390	545	98%	22%
36029003500	3,011	2,986	1,346	99%	45%
36029003600	2,550	2,291	1,246	90%	49%
36029003901	1,006	997	390	99%	39%
36029012001	4,187	354	310	8%	7%
36029012002	3,501	183	101	5%	3%

Census Tracts	Total Population	Minority Population	Population in Poverty	Percentage Minority	Percentage in Poverty
36029012003	5,047	261	156	5%	3%
36029012300	3,081	570	632	19%	21%
36029012400	2,056	266	591	13%	29%
36029005700	2,497	1,304	731	52%	29%
36029005900	3,998	1,799	1,456	45%	36%
36029016400	2,837	2,038	939	72%	33%
36029010202	3,601	2,277	597	63%	17%
36029010201	2,899	983	291	34%	10%
36029016700	2,374	332	444	14%	19%
36029013300	3,675	450	161	12%	4%
36029009110	5,620	2,355	-	42%	0%
36029013201	5,966	345	624	6%	10%