



ROCHESTER  
GENESEE REGIONAL  
TRANSPORTATION  
AUTHORITY

## TITLE VI PROGRAM PLAN, 2023 – 2026

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VERSION 6

OWNER: GENERAL COUNSEL

APPROVED BY THE RGRTA BOARD OF COMMISSIONERS MAY 04, 2023

SUBMITTED TO THE FTS (TRAMS) ON JUNE 01, 2023

EFFECTIVE AS OF AUGUST 01, 2023

NEXT SUBMISSION DUE DATE IS JUNE 01, 2026

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## 1.0. Organizational Overview

The Rochester-Genesee Regional Transportation Authority (“RGRTA” or “the Authority” or “we/us/our”) is a public benefit corporation and component unit of the State of New York (NYS). Created in 1969 by an act of the State Legislature, the Authority is charged with the continuance, further development, and improvement of public transportation and other related services within the Genesee/Finger Lakes region.

Fifteen commissioners govern RGRTA. Commissioners are recommended by their applicable local governing bodies, nominated by the NYS Governor, and confirmed by the NYS Senate. RGRTA management has no control over the appointments. Monroe County recommends four commissioners; the City of Rochester recommends three commissioners, and the rest of the member counties recommend one commissioner each. On November 3, 2022, CEO Bill Carpenter announced his retirement by the end of June 2023 to the RGRTA Board of Commissioners. The Board passed a resolution authorizing the search for the next CEO of RTS. On December 15, 2022, the RGRTA Board of Commissioners voted to appoint Deputy CEO Miguel Velázquez as CEO of RTS effective January 1, 2023.

RGRTA has nine operating subsidiaries. Membership in the Authority has grown to eight counties with a total land area of 4,350 square miles and a service area population of nearly 1.2 million.

### **RGRTA Snapshot**

*2022 Ridership:* 8,099,254

*2021 Ridership:* 7,778,388

*Number of Buses:* 401

*Number of Employees:* 1,000+

*Service Area Population:* 1,196,531

*Annual Miles:* 10,118,209

*Counties Served:* Genesee, Livingston, Monroe, Ontario, Orleans, Seneca, Wayne, and Wyoming

*Subsidiaries:* Regional Transit Service, Inc. (RTS), RTS Access (Lift Line), RTS Genesee (BBS), RTS Livingston (LATS), RTS Ontario (CATS), RTS Orleans (OTS), RTS Seneca (STS), RTS Wayne (WATS), RTS Wyoming (WYTS)

Details and descriptions of RGRTA’s current business structure are in the Comprehensive Strategic Plans published annually on <https://myrts.com/About-Us/Plan-Performance>.

### 1.1. Regional Transit Service, Inc. (RTS) in Monroe County

The Regional Transit Service, Inc. (“RTS” and “we/us/our”) is the largest subsidiary of RGRTA, operates in Monroe County, and is a recipient of Section 5307 funding. In 2017, we began a two-year process to plan a frequent bus network design to streamline schedules, frequencies, and routes. Named “Reimagine RTS,” the new design included fixed-routes in a frequent network, fixed-routes in a local network, and mobility solutions to provide demand responsive transit in suburban areas.

Reimagine RTS was scheduled to launch on June 29, 2020 but was postponed due to disruptions from the COVID-19 pandemic. The fixed route service continued to operate using the “old” network from April 2020 through May 16, 2021. The new bus network launched on May 17, 2021. We branded the new fixed route service “RTS Connect.” RTS Connect runs in Monroe County’s Rochester urban core and has the following features:

1. 31 fixed routes that run north to south and from east to west; and



2. 100 regularly scheduled fixed routes available to the public but designed to accommodate the needs of urban school students and personnel; and
3. Four service tiers; and
4. Two levels of service frequency.

The RTS Connect fleet has 198 vehicles including 20 battery electric buses. The vehicles consist of 40-foot buses and 60-foot articulated buses that are stored and maintained at the RTS campus located at 1372 East Main Street in Rochester NY, 14609.

Most of RTS Connect service is oriented around the RTS Transit Center, located at 60 Saint Paul Street on Mortimer Street, which functions as a central terminal to facilitate interlining. The facility is fully enclosed, climate controlled, has 30 bus bays, and can handle up to 100 buses an hour.

We branded the new demand responsive service “RTS On Demand.” RTS On Demand runs in suburban areas and has the following features:

1. Curb-to-curb trips reserved by request in seven suburban geographic areas (On Demand Zones); and
2. Smaller vehicles assigned to operate within an On Demand Zone; and
3. Ten Connection Hubs that allow customers to travel within an On Demand Zone and access the fixed route system or paratransit service area.

The RTS On Demand fleet has 25 vehicles (high-headroom vans and low-floor buses). The fleet is stored and maintained at the RTS campus.

RTS Access provides ADA complementary paratransit service in Monroe County and is a recipient of Section 5307 funds. RTS Access provides service to the required complementary paratransit service area; and three levels of supplemental service which extend coverage beyond what is required; and subscription service. RTS Access operates during the same hours as fixed-route service. RTS Access has a default curb-to-curb mode of service but will make reasonable modifications when requested to provide assistance beyond the curb (“door-to-door”).

RTS Access operates 53 vehicles, which are stored and maintained at a separate facility located at 588 Trabold Road in the Town of Gates.

### **1.2. Rural Subsidiaries in Surrounding Counties**

RTS Genesee, RTS Livingston, RTS Ontario, RTS Orleans, RTS Seneca, RTS Wayne, and RTS Wyoming all provide route deviation service in the rural counties and are recipients of Section 5311 funds. Route deviation service runs on established routes with designated stops. The bus may deviate from the route to serve points within three-quarters of a mile of the route, providing curb-to-curb service. After deviating, the bus will return to the point where it left the route. All service is curb-to-curb for areas open to the public within the service area. Customers reserve route deviation trips in advance and pay a premium fare. Fleet sizes vary for each subsidiary, ranging from eight to 42 small buses. Facilities are located in each county.

### **1.3. Corresponding Exhibit**

Additional details about the organization are available in [Exhibit 01: Organizational Overview](#).

## **2.0. Requirements for Title VI Compliance**

As a recipient of federal financial assistance, RGRTA is required to comply with federal nondiscrimination laws and regulations, including Title VI of the Civil Rights Act of 1964 (“Title VI”), which provides that *“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.” (Title VI Statute, 42 U.S.C § 2000d).*

RGRTA prepared this 2023-2026 Title VI Program Plan (“Plan”) in accordance with FTA Circular 4702.1B, dated October 12, 2012. It reports the evidence of RGRTA’s compliance with Title VI during the 2020-2023 period. The Plan contains materials and data RGRTA will use to comply with the General Requirements and the Requirements for Fixed Route Transit Providers under Title VI for the period of June 1, 2023 to June 1, 2026. With the application of its Plan, RGRTA will demonstrate compliance by:

1. Preventing the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations; and
2. Ensuring that the level and quality of transit service is provided without regard to race, color, or national origin; and
3. Promoting the full and fair participation of all affected populations in transit decision making; and
4. Identifying and addressing, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations; and
5. Ensuring meaningful access to programs and activities by persons with Limited English Proficiency.

### **3.0. General Requirements**

#### **3.1. Title VI Assurances**

For FTA Fiscal Years 2021, 2022, and 2023, the RGRTA Chief Executive Officer and Attorney (General Counsel) authorized the Certifications and Assurances for RGRTA. The signed documents are filed through RGRTA’s account with the Transit Awards Management System (TrAMS).

##### **3.1.A. Corresponding Exhibit**

The complete and signed Certifications and Assurances documents are in [Exhibit 02: Certifications and Assurances](#).

#### **3.2. Updating the Program and Submitting the Plan**

We do not have a Civil Rights Department or Title VI Coordinator in our organization. We share responsibility for carrying out Title VI requirements across the following departments: Legal Affairs; Maintenance; Transportation Services; RTS Access Scheduling; Engineering, Facilities, & Capital Projects; Service Planning; Communications & Customer Engagement; Customer Service; People, Performance, & Development. Specific roles contributing to the Plan’s content include:

- |  |  |   |
|--|--|---|
| – Business Analyst II                        | – Director of Communications & Customer Engagement | – Director of Scheduling                              |
| – Chief Diversity Officer                    | – Director of Engineering & Facilities Management  | – Director of Service Planning                        |
| – Chief Executive Officer                    | – Director of Paratransit Services                 | – General Counsel                                     |
| – Chief Financial Officer                    | – Director of Regional Operations                  | – Policies, Procedures, & Technical Documents Manager |
| – Chief Operating Officer                    |  | – Public Information Officer                          |
| – Customer Relationship Marketing Specialist |  | – Transportation Planner II                           |

We will submit our Plan to the FTA through TrAMS on June 1, 2023. Upon expiration of our 2020-2023 Plan on July 31, 2023, we will commence the activities outlined in the 2023-2026 Plan.

### Summarized Timeline of Program Submissions June 2017 to May 2023

<b>June 1, 2017</b>	RGRTA submits the 2017-2020 Plan to the FTA through TrAMS.
<b>June 27, 2019</b>	The Board approves the resolution to authorize the System Re-Design implementation plan. The new network is scheduled to launch June 29, 2020.
<b>August 19, 2019</b>	RGRTA receives a formal letter of concurrence from the FTA Civil Rights Officer Region II Luis Rodriguez and the Title VI Review Assessment confirming the Authority's program status as <i>Concur</i> . The Review Assessment identified <b>six</b> insufficient items that required correction.
<b>January 01, 2020 to February 29, 2020</b>	RGRTA sets a launch date of June 29, 2020 for "Reimagine RTS" – the new network with RTS Connect fixed route service and RTS On Demand demand responsive service in Monroe County.
<b>March 27, 2020</b>	RGRTA postpones the launch for "Reimagine RTS" due to disruptions in staff recruitment and training, customer education and outreach, and equipment supply chains due to COVID-19.
<b>April 13, 2020</b>	Responding to the COVID-19 pandemic consumes the company resources allocated to updating the Title VI Program Plan. RTS applies for a waiver. The FTA Civil Rights Officer for Region II approves a one-time extension of the submission deadline to October 01, 2020.
<b>May 01, 2020 to August 31, 2020</b>	RTS updates the Title VI Program Plan for the 2020-2023 period, including corrections to the six Insufficient Items identified in the 2019 Title VI Review Assessment.
<b>September 30, 2020</b>	RGRTA submits the 2020-2023 Plan to the FTA through TrAMS. FTA Civil Rights Officer Region II Luis Rodriguez requests additional material showing public participation in setting equity thresholds.
<b>November 05, 2020</b>	RGRTA Board of Commissioners approves Resolution 42-2020 to adopt and implement the 2020-2023 Title VI Program Plan. RGRTA uploads the resolution to TrAMS and supplemental exhibits from the 2014 (2015) submission and the 2017 submission that show public participation in setting equity thresholds.
<b>January 08, 2021</b>	RGRTA receives a formal letter of concurrence from the FTA Civil Rights Officer Region II Luis Rodriguez and the Title VI Review Assessment confirming the Authority's program status as <i>Concur</i> . <b>No</b> items are insufficient.
<b>May 17, 2021</b>	RGRTA launches the new Reimagine RTS system, with a new fixed route network and a demand responsive microtransit service.
<b>September 07-13, 2021</b>	RGRTA Board of Commissioners approve a resolution to make temporary emergency changes to the RTS Connect system. On September 13, 2021, RTS changes seven Frequent service routes from 15-minute service to 30-minute service on weekdays from 6am to 6pm. The changes allow RTS to support the Rochester City School District with additional service during a bus driver shortage.
<b>June 07-15, 2022</b>	Virtual site visit from the CDI/DCI Joint Venture Reviewer and Technical Program Manager to conduct the FY 2022 Triennial Review (US DOT FTA Region 2).
<b>August 02, 2022</b>	US DOT FTA Region 2 issues its Final Report on the RGRTA FY 2022 Triennial Review. No deficiencies are found with the FTA requirements for Title VI.
<b>May 04, 2023</b>	RGRTA Board of Commissioners approve Resolution RGRTA 17-2023 to adopt and implement the 2023-2026 Title VI Program Plan.

#### 3.2.A. Title VI Program Review Assessment

FTA Civil Rights Officer Region II Luis Rodriguez provided RGRTA with a Title VI Program Review Assessment as part of the concurrence letter for the 2017-2020 Plan. The assessment identified six insufficient items that required correction. The items were addressed and corrected in the 2020-2023 Plan. No deficiencies were found during FTA's review of the plan, as confirmed in the January 08, 2021, concurrence letter. Further, during the 2022 Triennial Review of RGRTA's compliance with Title VI, the Reviewers and FTA Region 2 representatives found no deficiencies.

#### 3.2.B. Corresponding Exhibit

The signed Board resolutions and FTA letters on the status of our program (Concurrence Letters) are in [Exhibit 03: Program Submission and Approval](#).

### 3.3. Notifying Beneficiaries of Protection under Title VI

During the 2020-2023 period, quarterly emails reminded the Customer Relationship Marketing Specialist to display the Title VI Notice on the digital monitors placed at each gate in the RTS Transit Center Concourse in English and Spanish. Of all the areas where the notice is available, the RTS Transit Center has the broadest ability to reach RTS Connect customers, second only to the [www.myrts.com](http://www.myrts.com) website.

In June 2022, we updated the notices to emphasize how people can request information about RGRTA's civil rights program or obligations under Title VI.

Updated Text	Method Provided
<p>To request information about RGRTA's civil rights program or obligations under Title VI, please:</p> <ul style="list-style-type: none"> <li>• Call Customer Service at (585) 288-1700</li> <li>• Use <a href="http://myRTS.com/contact-us">myRTS.com/contact-us</a></li> <li>• Visit the Administration Office at 1372 East Main Street, Rochester, NY (business hours are Monday through Friday, 8:00 AM to 5:00 PM)</li> </ul> <p>Para solicitar información sobre el programa de derechos civiles de RGRTA o las obligaciones conforme al Título VI, por favor, realice cualquiera de los siguientes pasos:</p> <ul style="list-style-type: none"> <li>• Llamar al Servicio al cliente al teléfono (585) 288-1700</li> <li>• Utilizar <a href="http://myRTS.com/contact-us">myRTS.com/contact-us</a></li> <li>• Visitar la oficina de Administración en 1372 East Main Street, Rochester, NY (el horario de atención es de lunes a viernes, de 8:00 a. m. a 5:00 p. m.)</li> </ul>	<ol style="list-style-type: none"> <li>1. Public website page at <a href="https://www.myrts.com/titleVI">https://www.myrts.com/titleVI</a> in English with a PDF available in Spanish for U.S.</li> <li>2. Bilingual flyers posted at the RTS Administration Building main lobby reception desk, the RTS Transit Center Customer Information Desks, and in each RTS Regional location.</li> <li>3. Bilingual notices included in the RTS Access paratransit eligibility certification packets sent to eligible people.</li> </ol>
<p>For information about RGRTA's civil rights program or Title VI, call (585) 288-1700 or use <a href="http://myRTS.com/contact-us">myRTS.com/contact-us</a>.</p> <p>Para solicitar información sobre el programa de derechos civiles de RGRTA o el Título VI, llamar al (585) 288-1700 o utilizar <a href="http://myRTS.com/contact-us">myRTS.com/contact-us</a>.</p>	<ol style="list-style-type: none"> <li>1. Digital display monitors at the RTS Transit Center (shown at a minimum every quarter).</li> <li>2. Rail cards displayed on fixed-route bus fleet (RTS Connect).</li> </ol>

#### 3.3.A. Notification Tasks Planned for 2023-2026

- ☐ Identify solutions for providing the updated information onboard vehicles for RTS On Demand, RTS Access, and RTS Regionals. The vehicles have limited space occupied by existing required decals.
- ☐ Revise the bilingual Title VI decals in the standard decal package installed on new RTS Connect fixed route vehicles (including new electric buses) to include the updated information.

#### 3.3.B. Corresponding Exhibit

Examples of notifications provided to the public during the 2017-2020 and 2020-2023 program periods are in [Exhibit 04: Examples of Notices to the Public](#).

### 3.4. Procedures for Filing, Investigating, and Tracking Title VI Complaints

There were no substantive updates to the process, procedure, or forms during 2020-2023. After RGRTA hired a Chief Diversity Officer, the Legal Affairs Department began communicating with the Chief Diversity, Equity, and Inclusion Officer (DEI) about complaints alleging discrimination.

During 2020-2023, we sent biannual reminders to Managers and Supervisors of Customer Service, Schedulers (Paratransit), Transportation Specialists, Radio Controllers, and Road Supervisors. The reminders identified the complaint process and gave instructions for responding to complaints.

### **3.4.A. Complaint Procedure Tasks Planned for 2023-2026**

- ☐ Determine whether there is a formalized role for the Chief DEI Officer in the Title VI Complaints process and procedures.

### **3.4.B. Corresponding Exhibit**

The complaint procedures, instructions, and forms are in [Exhibit 05: Title VI Complaints, Forms, and Procedures](#).

## **3.5. Reporting Investigations, Complaints, and Lawsuits**

RGRTA maintains a list of transit-related Title VI complaints, lawsuits, or investigations in accordance with 49 CFR §21.9(b). Two Title VI Complaints were filed during the program period of 2020-2023.

1. Mr. Barrington Price expressed a complaint on November 04, 2020, in a phone call to Customer Service alleging discrimination on the basis of race. After being notified of his rights under Title VI, Mr. Price filed a Title VI Complaint with the Legal Affairs Department on or around November 20, 2020. The investigation did not find a violation of the provisions of Title VI of the Civil Rights Act of 1964. Mr. Price was notified of the actions taken and the findings in a written letter dated March 21, 2021.
2. Ms. Andrea Desius filed a complaint with New York State Division of Human Rights (“Division”) on August 02, 2022. The Legal Affairs Department received a Notice of Charge of Discrimination and Verified Complaint from the Division (10218890) on August 08, 2022, through USPS mail (letter dated August 03, 2022). We responded to the attorney and Senior Claims Examiner in exchanges that occurred from August 17 to August 23. RGRTA formally responded to the charge through defense counsel. On March 08, 2022, the Division issued a determination letter. After investigation and following opportunity for review of the related information and evidence, the Division determined there is NO PROBABLE CAUSE to believe that RGRTA has engaged or is engaging in the discriminatory practice complained of. The complaint was ordered dismissed and the file closed.

### **3.5.A. Corresponding Exhibit**

Details about transit-related Title VI complaints, active investigations conducted by entities other than FTA, and lawsuits are in [Exhibit 06: Title VI Investigations](#).

## **3.6. Promoting Inclusive Public Participation**

We have the goal to provide public transportation that meets the needs of the community. We use a Public Participation Plan to promote two-way communication, foster transparency, and encourage community input. The Public Participation Plan provides opportunities for public comment as required by law; opportunities for public and stakeholder input during project planning; and opportunities for the inclusion of minority, low-income, and Limited English Proficient (LEP) populations through public workshops and information meetings. We update the Public Participation Plan as needed or at least triennially in conjunction with the Title VI Program Plan. It fulfills the following requirements:

- a. 49 USC Section 5307(c)—develop programs and projects with public participation; and
- b. 49 USC Section 5307(d)(1)(I)— a locally developed process to consider public comment before raising a fare or carrying out a major reduction in transportation service; and
- c. NYS Public Authorities Law—hold a public hearing for establishing or changing fares, tolls, rentals, rates, charges, or other fees for the transportation of passengers.

### **3.6.A. Public Participation Plan 2023-2026**

The Public Participation Plan for 2023-2026 has the following updates:



1. **Section 2.0 RGRTA's Business Profile.** We replaced highly specific details about ridership, fleet size, and employees with a general description of RGRTA.
2. **Section 3.0 Language Assistance.** We included the most recent LEP data and language assistance practices.
3. **Section 5.0 Public Participation.** We updated our mission statement.
4. **Section 6.1 Public Outreach.** We specifically state that we will engage in public outreach to persons potentially impacted by the siting of facilities.
5. **Section 8.3 Comment Cards.** We added details about the comment cards.

We submitted the Public Participation Plan to the Board of Commissioners for approval on May 04, 2023.

### **3.6.B. Summary of Transit Service Public Participation and Outreach Activities 2020-2023**

#### **Public Outreach for Changes to Title VI Program Policies**

We did not change the Major Service Change policy, Disparate Impact policy, or Disproportionate Burden policy during the period of 2023-2023, nor are changes proposed for 2023-2026.

#### **Public Outreach for Official Re-Imagine RTS Launch**

From April 05, 2021 to May 17, 2021, RTS ran an extensive advertising campaign and deployed Train-the-Trainer workshops to promote and prepare the public for the launch of the new RTS Connect and RTS On Demand services. From May 17 to May 23, trained Ambassadors equipped with education resources were at the RTS Transit Center and 10 Connection Hubs to assist customers through the change.

#### **Public Outreach Summary**

- Nearly 1400 ambassador hours worked.
- Ambassadors at Connection Hubs all day May 17 and May 18
- Ambassadors at Connection Hubs May 19 through May 23 during peak times
- 03-23-21 Train-the-Trainer session held from 12:00 PM to 1:30 PM via Zoom, with 40 minutes of overview information and 30 minutes of questions and answers. Participants from over 40 organizations attended. The session was recorded and distributed to those unavailable to attend live.
- 04-27-21 Customer Information Session held via Zoom 5:30 PM to 6:30 PM  
<https://youtu.be/VulFGGaU7j0>

#### **Advertising Summary**

- From April 05 to May 17, 2021, the following advertising components were used.
 

– TV	– Gas pump ads
– Radio, Spotify, Pandora	– Transit bus wraps (external) and internal rail cards
– Posters	– Bus shelter wraps and posters
– Digital and social media	– Transit Center digital monitors at each gate
– Billboards	
– Email and text messages	

#### **Education Summary**

- From March 01 to March 31, 2021, employees were educated about the new routes, the On Demand Zones, and how to assist customers.
- Train-The-Trainer materials included an RTS Go playlist [All About RTS Go - YouTube](#), bilingual brochures on RTS On Demand, a **bilingual** “Enjoy the Ride Guide,” a **bilingual** key of old routes to the new equivalent routes, and a **bilingual** brochure on how to use RTS Go to pay fare
- Reimagine RTS overview video posted online <https://youtu.be/1czCc7gxe2l>

**Train-the-Trainer Participation**

Train-the-Trainer Participants for Reimagine RTS Launch, 03-23-21 from 12:00 PM to 1:30 PM via Zoom	
<ol style="list-style-type: none"> <li>1. Action for a Better Community <a href="https://www.abcinfo.org/">https://www.abcinfo.org/</a></li> <li>2. Anthony L. Jordan Health Center <a href="https://jordanhealth.org/locations/">https://jordanhealth.org/locations/</a></li> <li>3. Baden Street Settlement <a href="https://badenstreet.org/">https://badenstreet.org/</a></li> <li>4. Catholic Charities Family and Community Services <a href="https://ww2.fcscharities.org/">https://ww2.fcscharities.org/</a></li> <li>5. Center for Disability Rights <a href="https://cdrnys.org/">https://cdrnys.org/</a></li> <li>6. Compeer Rochester <a href="https://www.compeerrochester.org/">https://www.compeerrochester.org/</a></li> <li>7. Coordinated Care Services, Inc. <a href="https://www.ccsi.org/">https://www.ccsi.org/</a></li> <li>8. Episcopal Senior Life Communities <a href="https://episcopalseniorlife.org/">https://episcopalseniorlife.org/</a></li> <li>9. Flower City Group <a href="https://flowercitygroup.com/">https://flowercitygroup.com/</a></li> <li>10. Finger Lakes Performing Provider System <a href="https://flpps.org/">https://flpps.org/</a></li> <li>11. Foodlink &amp; Curbside Market <a href="https://foodlinkny.org/program/curbside-market/">https://foodlinkny.org/program/curbside-market/</a></li> <li>12. Genesee/Finger Lakes Regional Planning Council <a href="https://gflrpc.org/">https://gflrpc.org/</a></li> <li>13. Genesee Transportation Council Metropolitan Planning Organization <a href="https://www.gtcmopo.org/">https://www.gtcmopo.org/</a></li> <li>14. Heritage Christian Services <a href="https://heritagechristianservices.org/">https://heritagechristianservices.org/</a></li> <li>15. Holy Childhood <a href="https://holychildhood.org/">https://holychildhood.org/</a></li> <li>16. Ibero-American Action League <a href="https://www.ibero.org/">https://www.ibero.org/</a></li> <li>17. Ibero-American Development Corporation <a href="http://iadconline.org/">http://iadconline.org/</a></li> <li>18. Isaac Training &amp; Education Center <a href="https://itctraining.com/">https://itctraining.com/</a></li> <li>19. Monroe County Library System <a href="https://libraryweb.org/">https://libraryweb.org/</a></li> <li>20. LiDestri Food and Drink <a href="https://lidedstrifoodanddrink.com/">https://lidedstrifoodanddrink.com/</a></li> <li>21. Monroe 2-Orleans BOCES <a href="https://www.monroe2boces.org/">https://www.monroe2boces.org/</a></li> <li>22. Monroe County, NY <a href="https://www.monroecounty.gov/">https://www.monroecounty.gov/</a></li> <li>23. Nazareth University, formerly Nazareth College <a href="https://www2.naz.edu/">https://www2.naz.edu/</a></li> <li>24. New York State Office of Children and Family Services <a href="https://ocfs.ny.gov/main/">https://ocfs.ny.gov/main/</a></li> <li>25. New York State Office of Mental Health <a href="https://omh.ny.gov/">https://omh.ny.gov/</a></li> </ol>	<ol style="list-style-type: none"> <li>26. Person Centered Housing Options, Inc. <a href="https://pcho.org/">https://pcho.org/</a></li> <li>27. Planned Parenthood of Central + Western NY <a href="https://www.plannedparenthood.org/planned-parenthood-central-western-new-york">https://www.plannedparenthood.org/planned-parenthood-central-western-new-york</a></li> <li>28. Remedy Staffing, Rochester Branch <a href="https://www.remedystaffing.com/">https://www.remedystaffing.com/</a></li> <li>29. Rochester Institute of Technology <a href="https://www.rit.edu/">https://www.rit.edu/</a></li> <li>30. Rochester Regional Health, <a href="https://www.rochesterregional.org/">https://www.rochesterregional.org/</a></li> <li>31. Rochester Rehabilitation <a href="https://www.rochesterrehab.org/">https://www.rochesterrehab.org/</a></li> <li>32. Rochester Works <a href="https://rochesterworks.org/">https://rochesterworks.org/</a></li> <li>33. Roman Catholic Diocese of Rochester <a href="https://www.dor.org/">https://www.dor.org/</a></li> <li>34. Salvation Army of Rochester NY <a href="https://easternusa.salvationarmy.org/empire/rochester/">https://easternusa.salvationarmy.org/empire/rochester/</a></li> <li>35. Self-Advocacy Association of New York State, Inc. <a href="https://sanys.org/sanys.org">https://sanys.org/sanys.org</a></li> <li>36. St. Joe's House of Hospitality <a href="http://www.saintjoeshouse.org/blog/">http://www.saintjoeshouse.org/blog/</a></li> <li>37. St. Joseph's Neighborhood Center <a href="https://www.sjncenter.org/">https://www.sjncenter.org/</a></li> <li>38. SUNY Brockport <a href="https://www2.brockport.edu/about/">https://www2.brockport.edu/about/</a></li> <li>39. The Center for Youth <a href="https://www.centerforyouth.net/">https://www.centerforyouth.net/</a></li> <li>40. The Council of Agency Executives <a href="https://www.agencyexecutives.com/">https://www.agencyexecutives.com/</a></li> <li>41. University of Rochester Medical Center <a href="https://www.urmc.rochester.edu/">https://www.urmc.rochester.edu/</a></li> <li>42. Villa of Hope <a href="https://www.villaofohope.org/">https://www.villaofohope.org/</a></li> <li>43. Visit Rochester New York <a href="https://www.visitrochester.com/">https://www.visitrochester.com/</a></li> <li>44. Volunteers of America Upstate New York <a href="https://www.voaupny.org/">https://www.voaupny.org/</a></li> <li>45. Veterans Outreach Center <a href="https://veteransoutreachcenter.org/">https://veteransoutreachcenter.org/</a></li> </ol>

**Customer Open Houses on Service Changes, Technology Changes, and Recruitment**

RTS held seven In-Person Customer Open House events between August 2021 and March 2023. We hold most Open Houses on advertised dates from Noon to 1:00 PM and 5:00 PM to 6:00 PM at the RTS Transit Center—the main interlining station for most RTS Connect fixed routes. The enclosed concourse provides a comfortable, temperature-controlled environment. We advertise the topics, date, time, and place at least two weeks prior before the Open House.

We provide an American Sign Language interpreter and bilingual RTS staff (Spanish/English). RTS staff provide information, take comments, and answer questions. Customers can relay their comments verbally by speaking with the staff at the Open House or calling Customer Service.

We did not hold in-person Customer Open Houses from January 2020 to July 2021 due to the COVID-19 pandemic.

We communicate the Customer Open House details using:

- Notices on digital monitors inside the RTS Transit Center
- Posters on all RTS Connect buses
- Notices posted on the [www.myRTS.com](http://www.myRTS.com) homepage, the [www.myRTS.com](http://www.myRTS.com) Event page, and RTS Facebook, Instagram and Twitter accounts
- Text messages to enrolled customers
- Email newsletters to enrolled customers

Open House Date	Topics	Language Assistance
8/26/2021 Noon to 1:00 PM 5:00 PM to 6:00 PM RTS Transit Center	<b><u>Service Changes Proposed for September 06, 2021</u></b> Change Route 18 Chili to 30-minute frequency as a Local route and remove service on Jet View Drive due to low ridership Add 1 weekend trip to 18 Chili Add new Route 23 West Ave./Airport to provide additional service to mitigate change to 18 Chili Add new 71 Public Market Special Add new 98 Lexington Commuter Replace 93 Webster Commuter with On Demand service in Webster On Demand Zone Replace 94 Brockport Commuter with On Demand service in Brockport On Demand Zone Replace 95 Eastview Commuter with On Demand service in Pittsford On Demand Zone <b><u>Questions + Comments</u></b> RTS Access Questions General Questions + Answers	ASL Interpreter from Sign Language Connection, Inc. Spanish-speaking RTS Staff at the event
12/15/2021 Noon to 1:00 PM 5:00 PM to 6:00 PM RTS Transit Center	<b><u>Service Changes Proposed for Jan 3, 2022</u></b> Return 15-minute frequency to Routes 8 East Main + 16 Genesee Extend weekday service to midnight in Lexington On Demand Zone Add one additional AM trip to Route 98 Lexington Commuter Eliminate Route 90 Avon/Rush Commuter	ASL Interpreter from Sign Language Connection, Inc. Spanish-speaking RTS Staff at the event



Open House Date	Topics	Language Assistance
	<p>Expand the Webster On Demand Zone to reach the Webster Recreation Center</p> <p>Eliminate the 2nd AM and 1st PM trips from the Route 92 Hilton/Hamlin Commuter</p> <p>Minor timing changes to Routes 21 Dewey + 98 Commuter at the Eastman Connection Hub</p> <p>Minor pattern changes to Routes 21 Dewey, 15 Plymouth, + 3 Joseph</p> <p><b><u>Questions + Comments</u></b></p> <p>RTS Access Questions</p> <p>General Questions + Answers</p>	
<p><b>3/23/2022</b>  <b>Noon to 1:00 PM</b>  <b>5:00 PM to 6:00 PM</b>  <b>RTS Transit Center</b></p>	<p><b><u>Service Changes Proposed for April 4, 2022</u></b></p> <p>Pause the Route 42 Lyell/Upper Falls Crosstown</p> <p>Combine Route 96 St. John Fisher Commuter with 91 Newark-Lyons Commuter; new 91 Newark-Lyons will make the same stops as the current 96 and 91 and include flag stops.</p> <p>Expand Irondequoit On Demand Zone to include Rochester General Hospital and Joseph C Wilson Health Center</p> <p><b><u>Technology + Equipment</u></b></p> <p>Update RTS Transit Center bus gate assignments (April 4, 2022)</p> <p><b><u>Recruitment</u></b></p> <p>Job Postings (including bus operators)</p> <p><b><u>Questions + Comments</u></b></p> <p>RTS Access Questions</p> <p>General Questions + Answers</p>	<p>ASL Interpreter from Sign Language Connection, Inc.</p> <p>Spanish-speaking RTS Staff at the event</p>
<p><b>6/14/2022</b>  <b>Noon to 1:00 PM</b>  <b>5:00 PM to 6:00 PM</b>  <b>RTS Transit Center</b></p>	<p><b><u>Service Changes Proposed for June 27, 2022</u></b></p> <p>New schedules go into effect</p> <p>Expand Lexington On Demand Zone to include Canalside Business Center</p> <p><b><u>Technology + Equipment</u></b></p> <p>RTS Go contactless fare media/system</p> <p><b><u>Recruitment</u></b></p> <p>Job Postings (including bus operators)</p> <p><b><u>Questions + Comments</u></b></p> <p>RTS Access Questions</p> <p>General Questions + Answers</p>	<p>ASL Interpreter from Sign Language Connection, Inc.</p> <p>Spanish-speaking RTS Staff at the event</p>
<p><b>8/24/2022</b>  <b>Noon to 1:00 PM</b>  <b>5:00 PM to 6:00 PM</b>  <b>RTS Transit Center</b></p>	<p><b><u>Service Changes Proposed for September 05, 2022</u></b></p> <p>Add Route 24 Bay to replace Route 71 Public Market Special</p> <p>Minor pattern changes to Routes 5 Portland + 10 Park</p> <p><b><u>Technology + Equipment</u></b></p> <p>Via software platform coming to On Demand</p> <p>RTS Go with VanillaDirect</p> <p><b><u>Recruitment</u></b></p> <p>Job Positions (including bus operators)</p> <p><b><u>Questions + Comments</u></b></p> <p>RTS Access Questions</p> <p>General Questions + Answers</p>	<p>ASL Interpreter from Sign Language Connection, Inc.</p> <p>Spanish-speaking RTS Staff at the event</p>

Open House Date	Topics	Language Assistance
<b>12/13/2022</b> <b>Noon to 1:00 PM</b> <b>5:00 PM to 6:00 PM</b> <b>RTS Transit Center</b>	<u><b>Technology + Equipment</b></u> Transit app with RTS On Demand integration RTS Go with VanillaDirect Q'Straint Quantum Demo <u><b>Recruitment</b></u> Job Positions (including bus operators) <u><b>Questions + Comments</b></u> RTS Access Questions General Questions + Answers	ASL Interpreter from Sign Language Connection, Inc. Spanish-speaking RTS Staff at the event
<b>03/08/2023</b> <b>5:30 PM</b> <b>RGRTA Headquarters</b> <b>Zoom</b>	<u><b>Meet the New CEO</b></u> Meet Miguel Velazquez and ask questions <u><b>Awareness of timing changes effective April 03, 2023</b></u> Minor adjustments to existing routes <u><b>Technology + Equipment</b></u> RTS Go with VanillaDirect <u><b>Recruitment</b></u> Job Positions (including bus operators) <u><b>Questions + Comments</b></u> RTS Access Questions General Questions + Answers	ASL Interpreter from Sign Language Connection, Inc. Spanish-speaking RTS Staff at the event

**Service Change Communication, Participation, and Outreach**

The major service changes we report in subsection 4.6 Major Service Change Equity Analyses Report on page 42 were discussed during Open Houses. We communicated the emergency changes due to the Rochester City School District bus driver shortage through digital messages. We also communicated service changes using the following methods.

- Recorded webinar overviews of service updates
  - April 2022 Service Updates <https://youtu.be/xYBVSEBG1kE>
  - September 2021 Service Updates [https://youtu.be/ygp0\\_QHwqSU](https://youtu.be/ygp0_QHwqSU)
- Train-the-Trainer kits for organizations
- Updated system map posters at RTS Transit Center
- Notices on digital monitors at each bus gate in the RTS Transit Center
- Email details in the Customer Newsletter to all customers with subscriptions
- Onboard bus posters
- Transit App/Google maps notifications
- Social media notifications through RTS Facebook, Instagram, and Twitter accounts
- Text messages to all enrolled customers

**Other Communication + Outreach Campaigns**

During the week of September 06, 2021, the Rochester City School District requested help to overcome its shortage of bus drivers. Within days, the RGRTA Board of Commissioners passed an emergency resolution to increase headway on RTS Connect Frequent routes and reallocate resources to assist the district with additional service. The changes occurred so rapidly that the bulk of communication and outreach occurred through the following channels.

- Notices on digital monitors at every gate in the RTS Transit Center
- Customer Service Representatives
- Website updates [www.myrts.com](http://www.myrts.com)
- Social media posts on RTS Facebook, Instagram, and Twitter accounts
- Text messages to all enrolled customers
- Emailed newsletter to all enrolled customers

We communicated the following information.

1. RTS is making changes to the RTS Connect system to help RCSD overcome its shortage of bus drivers and get students back to school.
2. We will change seven of our 15-minute routes to 30-minute routes.
3. These changes are temporary and once they are in place, we will assess when we can reinstate the 15-minute frequency on the impacted routes, which are:
  - 3 Joseph
  - 4 Hudson
  - 5 Portland
  - 8 East Main
  - 11 Monroe
  - 16 Genesee
  - 22 Lake
4. These changes go into effect on Monday, September 13.
  - Please view schedules or use the trip planner or Transit app.
  - Contact Customer Service at 585-288-1700, [myRTS.com/contact-us](http://myRTS.com/contact-us), or visit an RTS Transit Center info desk.

### **3.6.C. Community Engagement**

We maintain a regular presence among community groups and organizations including social services agencies, disability advocacy groups, organizations providing services to refugees, organizations providing support for low-income populations, and older adults. The Rochester-Monroe Anti-Poverty Initiative (“RMAPI”) is a multi-sector community collaborative established in 2015 in response to the exceptionally high poverty rates in the city of Rochester. We work with the RMAPI Transportation Subgroup on initiatives for improving transportation to meet the mobility needs of people living in poverty, with a particular focus on access to jobs. We attend meetings, provide updates and conduct training for neighborhood associations and community groups (Train-the-Trainer events), especially when a service change is likely to create confusion or disruption for one or more community areas.

### **3.6.D. Corresponding Exhibit**

The Public Participation Plan and list of community organizations that provide input are in [Exhibit 07: Public Participation](#).

### **3.7. Meaningful Access for Limited English Proficient Persons (“LEP”)**

We maintain a Limited English Proficiency Language Assistance Plan (“LEP LAP”) for the purpose of taking reasonable steps to provide meaningful access for LEP individuals to our benefits, information, activities, and services.

We created a “Ridership by Company” table to identify LEP exposure. The table combines American Community Survey data (“ACS”) and quarterly Customer Survey data with the census tracts served in each county. We rely on the table to perform the LEP LAP four-factor analysis, from which we determine:

- The number or proportion of LEP persons eligible to be served or likely to be encountered; and
- The frequency of contact with LEP persons; and

- The importance of our programs, activities, and services to LEP persons; and
- The resources available for LEP outreach and the associated costs.

LEP exposure is less than 5% across the service area. The dominant language is Spanish. RTS and RTS Access are likely to serve LEP persons overall. High percentages of Spanish-speaking LEP persons are also in the Public Use Microdata Area (PUMA) counties where RTS Genesee, RTS Orleans, RTS Livingston, RTS Wyoming, RTS Seneca, RTS Wayne operate.

The LEP LAP describes our implementation activities, including:

- Ongoing assessment of the need for LEP resources and services; and
- Methods of providing language assistance; and
- Outreach techniques; and
- Staff training; and
- Monitoring and updating the program; and
- Budgeting for language assistance services and resources.

### **3.7.A. Corresponding Exhibit**

The complete Limited English Proficiency Language Assistance Plan is available in [Exhibit 08: LEP Language Assistance Program](#).

### **3.8. Non-Elected Committees and Councils**

RGRTA has a non-elected RTS Access Paratransit Appeals Committee. The purpose of the Committee is to review and issue decisions on appeals about an eligibility determination or service suspension.

### **3.9. Minority Representation on Planning and Advisory Bodies**

Committee	Status	African American	Hispanic	Caucasian
RTS Access Appeals Committee (Paratransit)	Active 3 Members	33.3% 1 person	0%	66.6% 2 people

RTS Access develops a pool of Paratransit Appeals Committee members (“Committee”). RTS Access may recruit members from any source that RGRTA deems appropriate so long as the individuals selected are not involved in the RTS Access initial determination processes for eligibility or for service suspension.

RGRTA Executive Management continues to discuss the creation of a citizen advisory committee on public transportation and a separate one for paratransit. If such committees are created, Executive Management will write letters to and personally engage community groups and partnerships to request participant members.

### **3.10. Providing Assistance to Subrecipients and Monitoring Subrecipients**

RGRTA **does not** have subrecipients.

### **3.11. Determination of Site or Location of Facilities**

We are committed to selecting facility locations without regard to race, color, or national origin. We will complete an equity analysis when determining the site or location of facilities, including but not limited to storage, maintenance, and operations centers, that involve land acquisition or the displacement of residents or businesses. Such analyses shall occur at the census tract level and compare the impacts of alternative sites. We will consider nearby facilities to determine potential cumulative adverse impacts.

If the project’s location would result in a disparate impact based on race, color, or national origin, we will only proceed with the project if there is substantial legitimate justification for doing so and no viable alternative locations that would have a less disparate impact. In cases where other options exist, we will

implement the least discriminatory alternative and demonstrate how these conditions are met. We will engage in outreach to potentially impacted persons during the site selection process. The following planned facility projects shall require Title VI equity analyses during site selection.

1. New facility for RTS Access paratransit operations, including bus maintenance and storage.
2. New RTS Monroe Zero-Emission Depot to support a zero-emission bus fleet by 2035.
3. New RTS Seneca facility with bus storage, administrative offices, and bus wash area.
4. New RTS Genesee facility with bus storage, administrative offices, and bus wash area.
5. New RTS Wayne facility with bus storage, administrative offices, bus wash area, and electric vehicle charging station.

### 3.11.A. RTS Access Paratransit Operations Facility

RTS Access operates a paratransit service in Rochester, NY, with an annual ridership of 198,640 and a fleet of 53 buses. The fleet includes 20-foot and 22-foot buses such as the Phoenix Type IA E350 Ford. Its facility, located on 588 Trabold Road, is over 30 years old, undersized, and in a state of disrepair. In 2018, an architecture and engineering firm conducted a feasibility analysis and recommended relocating to an alternative facility or identifying a new site. A new RTS Access facility would require approximately 5 to 6 acres of land and 65,000 square feet of new building. A local real estate professional helped to identify thirty-nine potential sites with enough acreage. After applying site selection criteria, seven sites were viable for further evaluation. RTS Access ranked the seven sites according to size, cost rating, presence of a facility/building, traffic disruption, main thoroughfare access, and the calculated center of paratransit vehicle operation (number of non-revenue miles and hours). The scores left four potential sites for selection.

Site A: 1500-1600 Lexington Avenue, Census Tract 141.04

Site B: 898 Buffalo Road, Census Tract 143.02

Site C: 350 Buell Road, Census Tract 144

Site D: 28 Paul Road, Census Tract 146.02

RTS Access reviewed each site for impacts that might affect the community adversely. In summary, there would be no displacement of residents or businesses at the four locations considered for site selection. The Title VI equity analysis results are as follows.

Current site: 588 Trabold Road Rochester, NY 1462, Census Tract 28453

	<b>Site A 1500-1600 Lexington Ave. Census Tract 141.04</b>	<b>Site B 898 Buffalo Rd. Census Tract 143.02</b>	<b>Site C 350 Buell Rd. Census Tract 144</b>	<b>Site D 28 Paul Rd. Census Tract 146.02</b>	<b>Monroe County</b>
<b>Total Population</b>	3649	5035	4810	4455	<b>744,248</b>
<b>White</b>	3291	4173	3795	3719	<b>560,874</b>
<b>Non-White</b>	358	862	1015	736	<b>183,374</b>
<b>Non-White %</b>	9.8%	17.1%	21.1%	16.5%	<b>24.6%</b>
<b>Population under Poverty Line</b>	460	290	383	628	<b>105,226</b>
<b>Percentage under Poverty Line</b>	12.6%	5.8%	8.0%	14.1%	<b>14.6%</b>

	<b>Site A 1500-1600 Lexington Ave. Census Tract 141.04</b>	<b>Site B 898 Buffalo Rd. Census Tract 143.02</b>	<b>Site C 350 Buell Rd. Census Tract 144</b>	<b>Site D 28 Paul Rd. Census Tract 146.02</b>	<b>Monroe County</b>
<b>Median Income (Households)</b>	\$42,832	\$37,825	\$40,069	\$37,685	\$57,479
<b>LEP %</b>	5.3%	4.8%	1.9%	2.3%	4.0%
<b>Disparate Impact &gt; +/- 20%</b>	NO	NO	NO	NO	
<b>Disproportionate Burden &gt; +/- 20%</b>	NO	NO	NO	NO	

RTS Access used ACS Census Tract data and compared the four sites with the averages for Monroe County. RTS Access also applied the threshold criteria set forth in the Disparate Impact and Disproportionate Burden policies for RTS.

All the locations were under the Monroe County averages for Non-White % and Percentage Under Poverty Line. The LEP % for Site A 1500-1600 Lexington Avenue is 5.3% which is higher than the Monroe County average (4.0%).

No location triggered the thresholds for Disparate Impact or Disproportionate Burden. RTS Access determined that Site A 1500-1600 Lexington Avenue would be the first choice for public outreach and further analysis.

RTS Access conducted outreach in April and May 2022 and received comments that were mostly positive. The outreach revealed a nearby residential population located less than one mile away from the site. One of the residents voiced concern about the project. The occupants will not be displaced from their homes or neighborhoods. RTS Access determined the most equitable approach would be to engage residents in closest proximity to the site. RTS Access performed an equity analysis on the residential area.

	<b>1500-1600 Lexington Ave. Census Tract 141.04</b>	<b>Polaris, Planet, Parkedge, Emerson, Stenson Streets   Christopher Crt.   Mt. Read Blvd Census Tract 88.01</b>	<b>Monroe County</b>
<b>Total Population</b>	3649	6004	744,248
<b>White</b>	3291	1575	560,874
<b>Non-White</b>	358	4429	183,374
<b>Non-White %</b>	9.8%	73.77%	24.6%
<b>Population under Poverty Line</b>	460	1654	105,226
<b>Percentage under Poverty Line</b>	12.6%	27.55%	14.6%
<b>Median Income (Households)</b>	\$42,832	\$35,325	\$57,479
<b>LEP %</b>	5.3%	4.60%	4.0%
<b>Disparate Impact &gt; +/- 20%</b>	NO	YES	
<b>Disproportionate Burden &gt; +/- 20%</b>	NO	YES	

RTS Access used ACS Census Tract data for Site A 1500-1600 Lexington Avenue and the nearby residential streets (Polaris, Parkedge, Emerson, and Stenson Streets; Christopher Court; Mount Read Boulevard) and



compared the data with the averages for Monroe County.

The Non-White % and Percentage Under Poverty Line for the residential area (Census Tract 88.01) are significantly higher than Site A (Census Tract 141.04) and the Monroe County Averages. The LEP % for Site A (5.3%) is higher than the residential area in Census Tract 88.01 (4.60%) and the Monroe County average (4.0%).

We concluded that the residents of Census Tract 88.01 are vulnerable to Disparate Impact and Disproportionate Burden, and the RTS Access facility could create cumulative adverse impact.

We scheduled public outreach activities specifically for nearby businesses, stakeholders, and the residents in Census Tract 88.01 from February 15, 2023 to May 31, 2023. We will use the resulting input to determine whether there are adverse impacts to mitigate and whether examination of alternate options or options with the least discriminatory impact is necessary.

The outreach activities included direct meetings with the principal of Edison Career & Technology High School ("Edison Tech"), a letter mailed to the residents in Census Tract 88.01, a recorded presentation posted to [www.myrts.com](http://www.myrts.com) with captioning, and a request for comments (local newspaper, the RTS website, and social media). We advertised and held an in-person Public Information Meeting at the Edison Tech school, which is an accessible location within walking distance of the residential area, on April 19, 2023 at 6:00 PM.

After we collect and evaluate community input, we will apply the input to the planning process. We will continue to proceed with an Environmental Assessment (NEPA) and ultimately decide whether to acquire the property. If the project will proceed, RTS Access will continue to engage the neighboring residents, nearby businesses, and stakeholders; and, broaden outreach to RTS Access customers, organizations that provide services to paratransit users, and local officials. A report of the equity analysis results and a schedule of public participation activities are available in Exhibit 09: Facility Site Reports.

### **3.11.B. RTS Zero-Emission Depot**

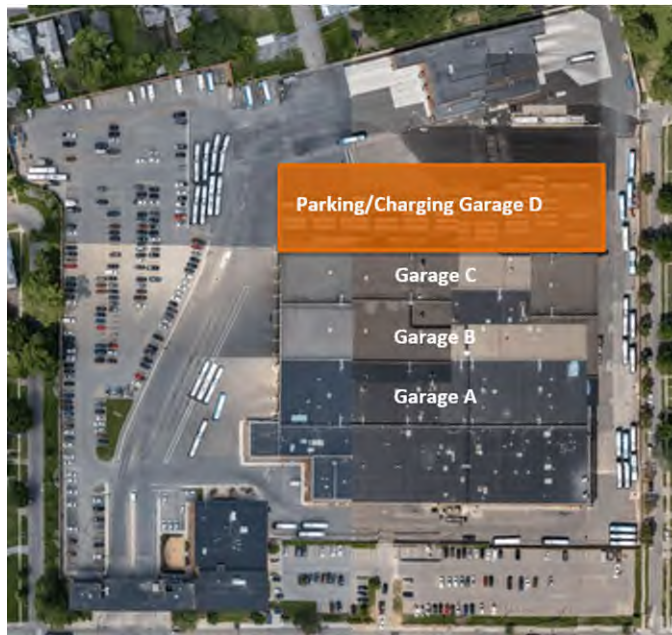
The RTS campus is located at 1372 East Main Street, Rochester NY 14609 (Monroe County). The campus is approximately ±19.3-acres and contains facilities for administrative, maintenance, and operation staff; and vehicle maintenance, fueling or charging, cleaning, and storage. It functions as the RGRTA headquarters.

The RTS Connect fleet has 198 vehicles including 20 electric battery buses. The vehicles consist of 40-foot buses and 60-foot articulated buses from manufacturers such as New Flyer, Nova, and Gillig. The RTS On Demand fleet has 26 small vehicles. We store and maintain both fleets at the RTS facility. RTS Bus Operators (other than those who are in-field reliefs) and Small Vehicle Operators report to the campus to receive their vehicle assignments. Vehicles travel from the campus to the RTS Transit Center or other start of the line locations for AM/PM pull-outs or to a designated start location in an On Demand Zone. At the end of the service day, all revenue vehicles return to the campus for cleaning, maintenance, storage, and preparation for the next service day.

We are working toward the goal of a 25% zero-emission bus fleet by 2025 and a 100% zero-emission bus fleet by 2035 for RTS Connect. While we have charging infrastructure to support 20 electric buses, we cannot accommodate additional capacity. We will need an additional facility to support a fleet that is entirely zero-emission. A new Zero-Emission Depot facility ("Depot") would store and charge or fuel zero-emission vehicles (electric and hydrogen fuel-cell).

Our current maintenance garage and bus parking garages can store 60% of the fleet: we refer to these facilities as Garages A, B, and C. We park the rest of the fleet outside. The Depot could be built directly adjoining Garage C. Following our naming convention, it would be referred to as "Garage D." The Depot will

require 68,393 square feet to allow up to 80 buses to be stored inside. At the time of this submission, we have not identified other site locations.



*Aerial photograph of the RTS Operations Building and garages showing proposed location for the Depot (“Garage D”)*

Residential neighborhoods surround the RTS campus. We performed an equity analysis to compare the current RTS campus location with the residential areas. The comparison used ACS census data for two Census Tracts (57 and 59), 52 street addresses, and the census data for Monroe County. We also applied the equity thresholds in place for major service changes and fare changes.

The tables of analysis results are in Exhibit 09: Facility Site Reports.

All the residential addresses showed Disparate Impact according to our equity thresholds and compared with Monroe County data. Most addresses showed Disproportionate Burden (37 out of 52) according to our equity threshold. All addresses have higher percentages under the poverty line when compared against Monroe County data.

There are no facilities with similar impacts in the area.

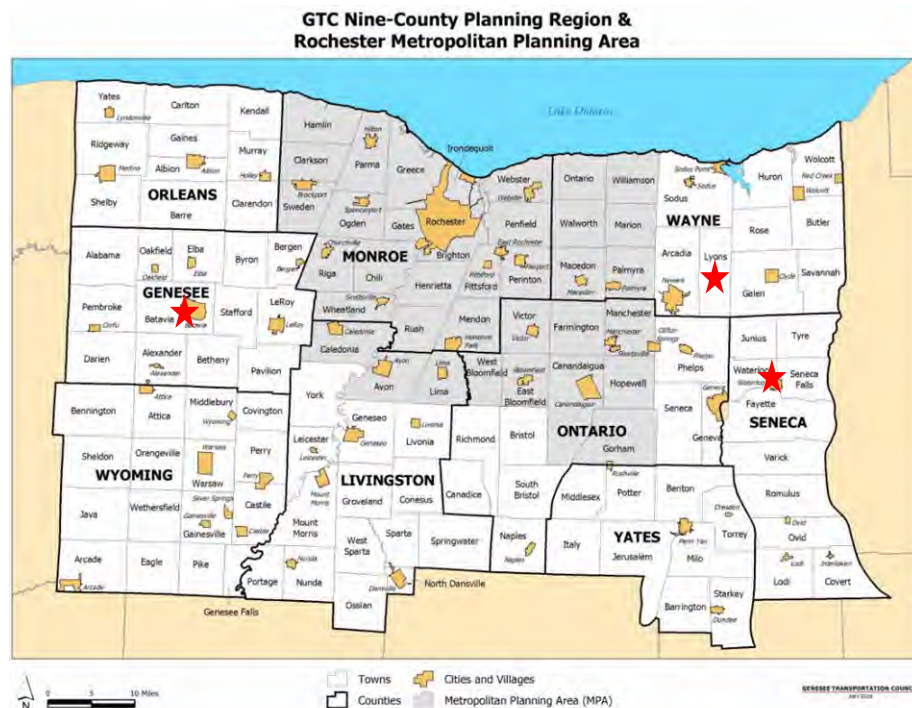
In compliance with Title 49 CFR Section 21.9(b)(3), RTS will proceed with the following activities during the 2023-2026 program period:

- Engage in outreach to persons potentially impacted by siting the Depot at 1372 East Main Street;
- Understand what the adverse impacts, if any, exist from the location;
- Identify and analyze site location alternatives to determine whether those alternatives would have less of a disparate impact;
- Evaluate whether there is a substantial legitimate justification for locating the project at 1372 East Main Street.

### **3.11.C. RTS Regional Facilities**

One of our guiding principles for Regional facilities is to co-locate them with their respective County Department of Public Works. This approach provides opportunities to share fueling infrastructure, maintenance resources, and office space. We are currently working on facility projects for RTS Genesee, RTS Seneca, and RTS Wayne.





County of an RTS Regional company with a planned facility project.

### **RTS Genesee Operations Facility**

RTS Genesee provides service on four deviated routes and Dial-A-Ride service in Genesee County. The company has an annual ridership of 22,298, a fleet of 12 buses, 16 employees, and a service area population of 57,280. The fleet includes 25-foot, 26-foot, and 32-foot buses such as the Phoenix Ford E450 Type III or Aerolite El Dorado IC Diesel.

RTS Genesee operates under a lease agreement on an adjacent site owned by Genesee County, which is shared with the County Highway Department and the County Department of Weights and Measures. RTS Genesee administrative employees use a shared office in the County Highway Department facility located on 153 Cedar Street in the Town of Batavia. We have a contract with Genesee County to maintain and fuel the RTS Genesee bus fleet.

A separate building on the property functions as a storage area for the RTS Genesee buses ("bus barn"). The bus barn is open-sided and cannot fit the entire fleet. It lacks a fire suppression system/fire alarm system. Bus Operators require additional time to defrost and clear the buses during winter months. The unpaved area and bus barn are in a flood zone.

RGRTA proposes to acquire a site where it can build a new facility to completely shelter the entire RTS Genesee fleet. The new facility would include administrative office space, bus storage and a vehicle wash area. The goals are to keep the buses secure, extend their longevity, retain a better state of repair, and eliminate idling and defrosting/snow removal in winter. Further, the new facility should be outside of a flood zone and eliminate the need for Operators to walk on an unpaved gravel surface to reach their buses. The new facility would not include maintenance or fueling infrastructure. The proximity of the new facility would consider the need to continue using the Genesee County's services and facilities for bus fueling and maintenance.

A new RTS Genesee facility would require 2.5 acres of land to support a 14,000 square foot building. We evaluated nearby areas and worked with Genesee County Industrial Development to identify six potential sites that were at least 2.5 acres.

Site A: Cedar St, Batavia, NY 14020 Census Tract 9510 (street address is unknown, it is near 153 Cedar St.)

Site B: West Saile Rd & Call Parkway Batavia, NY 14020 Census Tract 9504.01

Site C: 4868 East Saile Drive Batavia, NY 14020 Census Tract 9504.01

Site D: 5158 East Main St Road Batavia NY 14020 Census Tract 9504.02

Site E: Elicott St Road Batavia NY 14020 Census Tract 9504.02

Site F: Ag Park Dr W Batavia NY 14020 Census Tract 9504.02

There would be no displacement of residents or businesses at the six locations considered for site selection. The Title VI equity analysis compares potential sites against the RTS equity thresholds for major service changes/fare changes, as well as against the averages for Genesee County, using ACS data.

Current site: 153 Cedar St, Batavia, NY 14020, Census Tract 9510

	<b>Site A Cedar St.</b>	<b>Site B W. Saile Rd.</b>	<b>Site C E. Saile Dr.</b>	<b>Site D Elicott St.</b>	<b>Site E 5158 E. Main St.</b>	<b>Site F Ag Park Dr</b>	<b>Genesee County</b>
<b>Total Population</b>	2558	2835	2835	3508	3508	3508	<b>58387</b>
<b>White</b>	2117	2785	2785	3498	3498	3498	<b>53271</b>
<b>Non-White</b>	411	50	50	10	10	10	<b>5116</b>
<b>Non-White %</b>	17.2%	1.8%	1.8%	0.3%	0.3%	0.3%	<b>8.8%</b>
<b>Population under Poverty Line</b>	716	283	283	161	161	161	<b>5977</b>
<b>Percentage under Poverty Line</b>	28.0%	10.0%	10.0%	4.6%	4.6%	4.6%	<b>10.4%</b>
<b>Median Income (Households)</b>	\$28,420	\$30,288	\$30,288	\$37,179	\$37,179	\$37,179	<b>\$33,386</b>
<b>LEP %</b>	1.2%	0.0%	0.0%	0.0%	0.0%	0.0%	<b>0.7%</b>
<b>Disparate Impact greater than +/- 20 percent?</b>	YES	NO	NO	NO	NO	NO	
<b>Disproportionate Burden greater than +/- 20 percent?</b>	YES	NO	NO	NO	NO	NO	

Site B, Site C, Site D, Site E, and Site F have Non-White % and Percentage Under Poverty Line numbers below the Genesee County averages of 8.8% and 10.4%. Their LEP % is 0.0% compared to the Genesee County average of 0.7%.

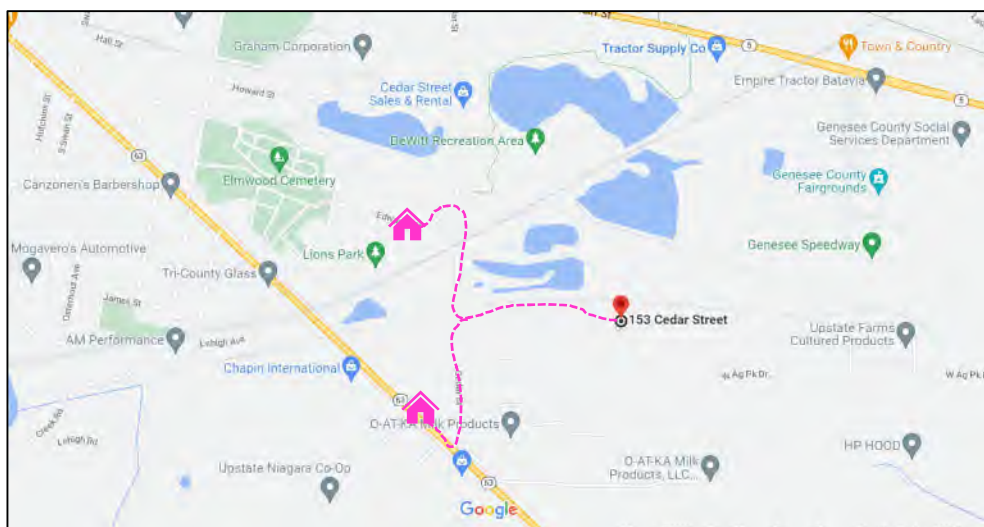
Site E and Site F are no longer viable options. We removed Site E (5158 East Main Street) from the list because it had the highest upfront cost. Another entity purchased Site F Ag Park Drive during our evaluation.

Sites B and C do not trigger the thresholds for Disparate Impact or Disproportionate Burden. Each site is over four miles away from the County Highway Department. Employees and fleet vehicles would need to travel between the County Highway Department for fueling and maintenance. Site D Elicott Street Road is roughly a mile from the County Highway Department and has no Disparate Impact or Disproportionate Burden. Areas along Elicott Street Road that are of interest are primarily agricultural and used for row crops.

Potential Site	Distance from 153 Cedar Street Genesee County Highway Department
<b>Site A: Cedar Street, near 153 Cedar Street</b>	No significant distance
<b>Site B: W. Saile Rd &amp; Call Parkway Batavia, NY 14020</b>	4.5 miles, one-way
<b>Site C: 4868 East Saile Drive Batavia, NY 14020</b>	4.3 miles, one-way
<b>Site D: Elicott St Road Batavia NY 14020</b>	1 mile approximately, one-way

Site A would not require fueling or maintenance infrastructure in the new facility or add travel time for fueling and maintenance at the County building. The results for Site A show significantly higher percentages of minority and low-income populations compared with the County average. The Non-White % is 17.2% compared to Genesee County's 8.8%, the Percentage Under Poverty Line is 28.0% compared to Genesee County's 10.4%, and the LEP % is 1.2% compared to Genesee County's 0.7%. Site A triggered the thresholds for Disparate Impact and Disproportionate Burden. However, Site A is located nearly on the border between Census Tracts 9510 and 9504.02.

Residential and business areas begin nearly  $\frac{3}{4}$  of a mile from Site A (153 Cedar Street) and are in the northwest and southwest of Census Tract 9510. The property to the north and east of Site A is primarily industrial (dairy factories) and recreational (fairgrounds, speedway).



*Areas to the east and north of Cedar Street (Site A) are recreational and industrial (dairy factories) with no residences. The nearest residences are nearly  $\frac{3}{4}$  of a mile to the west, with the density of residential areas increasing to the northwest.*

We will conduct additional evaluation, analysis, and outreach to understand the specific adverse impacts Site A could have on the population in Census Tract 9510.

In compliance with Title 49 CFR Section 21.9(b)(3), RGRTA will proceed with the following activities during the 2023-2026 program period:

- Engage in outreach to persons potentially impacted by the siting of facilities at Site A;
- Understand what the adverse impacts of Site A are;
- Evaluate whether there is a substantial legitimate justification for locating the project at Site A rather than Sites B, C, or D.

#### **RTS Seneca Operations Facility**

RTS Seneca provides service on three deviated routes and Dial-A-Ride service in Seneca County. The company has an annual ridership of 29,682, a fleet of 8 buses, 14 employees, and a service area population of 34,016. The fleet includes 25-foot and 32-foot buses such as the Phoenix Ford E450 Type III and Aerolite El Dorado IC Diesel.

RTS Seneca currently operates from the Seneca County Office Building located at 1 DiPronio Drive

Waterloo, NY 13165. Administrative employees work from a small office inside the County Building. During summer months, they park the buses in the parking lot near the Social Services Building. During the fall, winter, and spring months, the parking lot accumulates standing water and ice. During these periods, they park the buses in the Bonadent Drive parking lot 0.3 miles away. RTS Seneca organizes all vehicle repairs through an arrangement with RTS Ontario.

The goal for RTS Seneca is to consolidate administrative operations and sheltered bus storage on a dedicated site. We determined that achieving the goal will require relocating RTS Seneca's operations from the County building to a new facility. The proposed facility includes property acquisition and construction of a pre-engineered single story steel structure for bus storage, administrative office space, bus washing and employee support space (e.g., break room). The project will include parking and circulation space outdoors, fencing, sidewalks, lighting, landscaping, utilities, stormwater management, and sanitary sewage connection. We evaluated nearby areas and identified three potential sites that were at least 1.8 acres.

Site A: 23 Thurber Drive Waterloo, NY 13165 Census Tract 9505

Site B: 31 Thurber Drive Waterloo, NY 13165 (Former Seneca Health Facility) Census Tract 9505

Site C: 2465 Bonadent Drive, Waterloo, NY 13165 Census Tract 9504

RTS Seneca reviewed each site for impacts that might adversely affect the community. None of the locations will displace residents or businesses. The Title VI equity analysis compared the potential sites against our equity thresholds for major service changes/fare changes, and against the averages for Seneca County, using ACS data.

Current site: 1 DiPronio Drive Waterloo, NY 13165 Census Tract 9505

	<b>Site A 23 Thurber Drive</b>	<b>Site B 31 Thurber Drive</b>	<b>Site C 2465 Bonadent Drive</b>	<b>Seneca County</b>
<b>Total Population</b>	3738	3738	2545	33900
<b>White</b>	3348	3348	2317	30411
<b>Non-White</b>	390	390	228	3489
<b>Non-White %</b>	10.4%	10.4%	9.0%	10.3%
<b>Population under Poverty Line</b>	406	406	295	3688
<b>Percentage under Poverty Line</b>	11.6%	11.6%	11.6%	11.9%
<b>Median Income (Households)</b>	\$28,777	\$28,777	\$29,775	\$32,575
<b>LEP %</b>	1.0%	1.0%	2.5%	0.8%
<b>Disparate Impact greater than +/- 20 percent?</b>	NO	NO	NO	
<b>Disproportionate Burden greater than +/- 20 percent?</b>	NO	NO	NO	

None of the sites triggered the thresholds for Disparate Impact or Disproportionate Burden. Sites A and B have a slightly higher Non-White % than the County average (10.4% compared to 10.3%). All three sites have higher percentages of LEP populations than the County average of 0.8%, with Site C the highest at 2.5%. All three sites are slightly under the County percentage for low-income (11.6% compared to 11.9%).

The area near Site A is a medium density commercial/ business park area with a residential neighborhood located to the northwest. Property users in the surrounding vicinity include a Walmart Supercenter, hotels, restaurants, Seneca County municipal buildings, and several health-related institutional campuses. Most properties have landscaped setbacks and/or are surrounded by parking lots.

Access to Site A would be from Thurber Drive, a two-lane two-way road. The project would relocate existing bus operations from the County office building on DiPronio Drive about ¼ mile from the project site but would not result in any substantial changes to traffic patterns or introduce any new operations or traffic to



the area. The RTS Seneca fleet typically leaves the site between 6 AM and 8 AM to begin their routes and return between 5 PM and 7 PM and we do not anticipate that this level of operations will change.

RGRTA engaged Environmental Design & Research, Landscape Architecture, Engineering, & Environmental Services, D.P.C. (EDR) to conduct an Archaeological Survey of Site A. The survey determined that no archaeological sites or historic structures are located within limits of proposed ground disturbance for the project. RGRTA selected Site A as the project location based on its alignment with Title VI and NEPA requirements and the ability to negotiate a purchase agreement with Seneca County.

On November 4, 2021, RGRTA fulfilled its obligation to comply with the New York State Environmental Quality Review Act ("SEQR") by establishing itself as the lead agency and issuing a negative declaration with respect to the proposed project and the location site of 23 Thurber Drive.

On November 04, 2021, the RGRTA Board of Commissioners authorized the purchase of 1.8 acres of land located at the intersection of Thurber Drive and DiPronio Drive in the Village of Waterloo, Seneca County, NY. The land acquisition was funded with Federal (80%), New York State (10%) and Authority (10%) funds.

The purchase completed on January 31, 2022. The site design was approved on January 20, 2023. Bidding preparations are underway for construction services.

#### **RTS Wayne Operations Facility**

RTS Wayne provides service on 10 deviated routes and Dial-A-Ride service in Wayne County. The company has an annual ridership of 73,946, a fleet of 42 buses, 61 employees, and a service area population of 89,918. The fleet includes 25-foot, 30-foot, and 32-foot buses such as the Phoenix Ford E450 Type III, Aerolite El Dorado IC Diesel, Aerotech El Dorado International Type VI, and AeroElite El Dorado International Type VI.

RTS Wayne is co-located at 7227 State Route 31 Lyons, NY 14489 with the Wayne County Highway Department Facilities. The co-location provides RTS Wayne with office space, outdoor parking for 42 buses, and maintenance services. In 2021, Wayne County Highway Department Officials began analyzing the site for future County construction projects. The County Officials asked us whether they would need to allocate space for RTS Wayne to construct bus garages at the 7227 State Route 31 location. RGRTA determined that RTS Wayne would need a bus storage barn capable of housing 42 buses, one bus wash bay, and significant expansion of the administrative office. These improvements require more space than the Wayne County Highway Department can reasonably allocate. RGRTA is presently searching for potential site locations but has no sites for evaluation as of this program submission.

#### **3.11.D. Corresponding Exhibit**

The report on the determination of sites for facility projects is available in [Exhibit 09: Facility Site Reports](#).

### **4.0. Requirements for RTS Fixed Route**

As mentioned in the Organizational Overview, RGRTA has ten business units. Of those ten, only RTS in Monroe County provides fixed route service (RTS Connect).

#### **4.1. Quantitative Standards for Monitoring the Level of RTS Fixed Route Service**

In accordance with the requirements of 49 CFR Part 21.5, RTS applies system-wide quantitative standards to ensure that it does not discriminate against any individual, on any basis, with regard to routing, scheduling, quality of service, frequency of service, age and quality of vehicles assigned on routes, quality of stations serving different routes, or the location of routes.

RGRTA's *Title VI Program Policies for Service Changes & Service Monitoring on RTS Fixed Routes* contains the materials required for fixed route providers in FTA Circular 4702.1B. These materials are the Service Standards, the Service Policies, and the three equity policies: Major Service Change Policy, Disparate Impact

Policy, and Disproportionate Burden Policy. We review the document at least triennially or as needed.

The 2017-2020 version of *Title VI Program Policies for Service Changes & Service Monitoring on RTS Fixed Routes* remained in effect until the Reimagine RTS system went live. The 2020-2023 version went into effect May 17, 2021. It contained details that resulted from the public participation that occurred during the planning for Reimagine RTS.

During the 2020 to 2023 program period, there were no changes to the Major Service Change Policy, Disparate Impact Policy, and Disproportionate Burden Policy. We made no changes to the equity policies during our triennial review for the 2023-2026 version.

If we make substantive changes to any of our equity policies, we will follow our process for public participation. We will present the changes during Public Information Meetings and through pre-recorded presentations on the website. We will advertise the meetings and changes through newspaper notices, website notices, social media posts, text messages, email newsletters, and radio. We may also hold a public hearing to solicit comments. We will solicit public comments for a defined period. We will review and respond to all comments at the conclusion of the comment period. If the public input prompts us to make more changes to the policies, we will summarize the changes in the responses. We will provide a summary to the Board of Commissioners for final approval.

The 2023-2026 *Title VI Program Policies for Service Changes & Service Monitoring on RTS Fixed Routes* contains minor corrections to typography, syntax, and word choice.

1. **Section 5.0 Title VI Service Monitoring.** We added a paragraph and demographic map to explain why the majority of RTS fixed routes meet the criteria for Minority Customer Routes.
2. **Subsection 5.2.C. RTS Fixed Route Service Types and Allocation.** We removed the specific number of Core routes because this could change over time. We removed specific route names and numbers from the descriptions for the Crosstown, Suburban, and Commuter service types.

The 2023-2026 version will be submitted as part of the Plan submission to the Board of Commissioners for approval on May 04, 2023. It will go into effect at the start of the 2023-2026 Plan period (August 01, 2023).

The 2023-2026 *Title VI Program Policies for Service Changes & Service Monitoring on RTS Fixed Routes* will be available for ongoing public access and public comment at <https://www.myrts.com/titleVI>.

Customers can issue comments by calling Customer Service or using the online Contact Us form <https://rts.secure.force.com/RTSContactUs>. Customers concerned that the service design and operation practices do not match the standards and policies or that the policies themselves result in discrimination on the basis of race, color, or national origin can contact RGRTA through the above methods.

#### **4.1.A. Corresponding Exhibit**

The full document *Title VI Program Policies for Service Changes & Service Monitoring on RTS Fixed Routes* is available in [Exhibit 10: System-Wide Standards and Policies](#).

#### **4.2. Collect and Report Demographic Data**

RTS uses the following resources, methods, and tools to collect data on ridership, travel patterns, and demographics: Business Intelligence and Enterprise Data Warehouse tools, on-board bus technologies, scheduling software, U.S. census data – particularly American Community Survey data sets, geographic information mapping systems (ArcGIS), and quarterly on-board Customer Surveys.

**Ridership and Travel Patterns**

<b>Collection Tools</b>	On-board bus systems: CAD/AVL, automatic passenger counter (APC), fare collection technology
<b>Reporting Method</b>	We use statistical methods to evaluate and present the data in a meaningful and accurate format. We use business intelligence and enterprise data warehouse tools to collect ridership data, concentrating on the number of customers in a bus at any given time and providing the following information: Date, Time, Schedule, Company, Vehicle, Employee, Stop, Run, Route, Block, Trip, and Pattern.
<b>Exhibit</b>	Exhibit 11: Demographic Data <ul style="list-style-type: none"> <li>Ridership Data by Each Fixed Route</li> <li>Ridership Data by Stop Type on Weekdays, Saturdays, and Sundays (Travel Patterns)</li> </ul>

**Demographics**

Collection Tools	ACS 2016-2020 5-year set, the 2020 Census Redistricting data set, ACS 2017-2021 5-year estimates, GIS technology	
Reporting Method	We use GIS to locate the populations most likely to rely on transit and to identify where those populations need to travel. The inputs include spatial data (shapefiles, coordinates, addresses) and datasets (ridership, route traces, bus stop locations, service areas, and data from the City, County, State, other governmental agencies, and the U.S. Census Bureau). The outputs are demographic and service profile maps. We apply the data to our Title VI equity analyses for major service changes, fare changes, and facility site locations and our 4-factor analysis for the LEP LAP.	
Exhibits	Exhibit 08: LEP Language Assistance Program	
	Exhibit 09: Facility Site Reports	
	Exhibit 11: Demographic Data	
	<ul style="list-style-type: none"><li>RTS Fixed Route Network System Map</li><li>Above Average Minority Population by Census Tract</li><li>Above Average Minority Population and Fixed Transit Facilities</li><li>Above Average Minority Population and Connection Hubs</li></ul>	<ul style="list-style-type: none"><li>Above Average Poverty by Census Tract</li><li>Above Average Low-Income Population and Fixed Transit Facilities</li><li>Above Average Low-Income Population and Connection Hubs</li><li>Fixed Transit Facilities Recently or Scheduled to be Replaced</li></ul>
	Exhibit 13: Major Service Change Reports	
Collection Tools	Quarterly Onboard Customer Surveys	
Reporting Method	We have contracted with a vendor since 2010 to conduct on-board customer surveys each quarter for fixed route service. The quarterly survey period is referred to as a “wave.” A sample population of 400 to 500 RTS customers participate in each wave. The surveys include questions about income level, racial identity, and language. Our vendor has conducted 49 survey waves and 24,511 face-to-face onboard interviews to date. The vendor conducts the interviews, collects the responses, tabulates the responses, and provides reports to RTS. We use the data to measure customer satisfaction in the quarterly TOPS measurement. We also apply the data to our Title VI equity analyses for major service changes, fare changes, and facility site locations and the 4-factor analysis for our LEP LAP.	
Exhibit	Exhibit 11: Demographic Data	
Collection Tools	Annual American Bus Benchmarking Group Survey	
Reporting Method	RGRTA is a member of the American Bus Benchmarking Group (ABBG), a confidential forum for mid-sized bus organizations in America to learn from each other by comparing performance, sharing experiences, and identifying best practices. ABBG has been conducting nationwide transit customer surveys with member agencies since 2009. RGRTA has participated during the last few years. The most recent survey was March 28 – May 1, 2022, and the next survey is scheduled for spring 2023. ABBG provides the survey and collects the responses. We put the surveys on our website and at kiosks in the RTS Transit Center. The surveys are available in Spanish and English. ABBG provides us with a report of broader trends and supplies specific data in charts, appendices, or through visualization tools. The data offers another view of demographic and customer satisfaction information.	

#### 4.2.A. Corresponding Exhibit

The following items are available in [Exhibit 11: Demographic Data](#).

1. Tables
  - a. Ridership Data by Each Fixed Route
  - b. Ridership Data by Stop Type on Weekdays, Saturdays, and Sundays (Travel Patterns)
  - c. Minority Census Tracts in RTS Fixed Route Service Area
  - d. Low-Income Census Tracts in RTS Fixed Route Service Area
2. Maps
  - a. RTS Fixed Route Network System Map
    - 1) Above Average Minority Population by Census Tract
    - 2) Above Average Minority Population and Fixed Transit Facilities
    - 3) Above Average Poverty by Census Tract
    - 4) Above Average Low-Income Population and Fixed Transit Facilities
  - b. Fixed Transit Facilities Recently or Scheduled to be Replaced
  - c. RTS On Demand Zones and Connection Hub Map
    - 1) Above Average Minority Population and Connection Hubs
    - 2) Above Average Low-Income Population and Connection Hubs
3. Survey Report Samples
  - a. RTS Onboard Customer Survey Questions, Wave 49
  - b. Level7 Onboard Customer Survey reports (November 2022)\*

*\*The reports are abbreviated to reflect a sample of the material and reduce the page count of the exhibit. We can provide the reports in their entirety upon request.*

#### 4.3. Service Performance Monitoring

We hold monthly Service Monitoring Meetings that include most of the Leadership across the organization. The team reviews performance data from the month prior, examines trends, and discusses potential changes to service. The team examines currently operating frequent, local, suburban, crosstown, and commuter fixed routes as well as RTS On Demand performance by zone.



*Service Monitoring does not include the Neighborhood Direct Service (NDS) routes. NDS routes are regularly scheduled Core routes available to the public but designed to accommodate the needs of school students and personnel.*

The Service Monitoring Meetings provide a forum to monitor the performance of non-minority and minority routes, and to conduct minority transit route comparisons. We conducted a minority transit route comparison and reported it during the July 20, 2022, Service Monitoring Meeting.

We conducted the analysis in compliance with the FTA requirement to monitor our fixed route transit system relative to our system-wide service standards and service policies (*Title VI Program Policies for Service Changes & Service Monitoring on RTS Fixed Routes*) not less than every three years.

We undertake these periodic monitoring activities to compare the level of service provided to predominantly minority areas with the level of service provided to predominantly non-minority areas and verify that the result of our policies and decision-making is equitable.

We report the results of the monitoring program to the Board of Commissioners for their review and acceptance no less than every three years and prior to a major Title VI Program Plan submission to the FTA.



★ *We have experienced persistent bus driver shortages since September 2021. The shortages affected the frequency (headway) for Routes 3, 4, 5, 8, 11, 16, and 22. The issue is still present and continues to affect Routes 3, 4, 5, 11, and 22. All the affected routes are Minority Routes. More details about the shortages and the impacts are provided in subsections 4.4 Challenges in Service Monitoring, Service Delivery, and Service Quality and 4.6 Major Service Changes with Equity Impacts and Mitigations.*

★ *The bus driver shortage creates a discriminatory pattern for vehicle headway when Minority Routes are classified as Frequent Service. No equitable alternatives exist without a larger available workforce. RTS has increased efforts to hire Bus Operators, including advertising and holding “job fair” events. We will decrease headways on the affected Minority Customer Routes when enough Bus Operators are available, with priority for those with highest customer demand.*

The July 2022 analysis found no discriminatory patterns for vehicle load, vehicle headway\*, on time performance, vehicle assignment, service availability, or distribution of transit amenities (bus shelters).

\*Where the routes have been recategorized from Frequent to Local service.

#### 4.3.A. Methodology and Data Sources

The Minority Customer Route service performance monitoring includes the following steps:

1. We use the Minority Customer Route definition to implement this monitoring program. We select a sample of minority and non-minority routes from all fixed route service. The sample includes routes that provide service to predominantly minority areas and non-minority areas.
2. We compare actual service data to the established service policies and standards.
3. For cases in which the observed service for any route exceeds or fails to meet the standard or policy, depending on the metric measured, we analyze why the discrepancies exist, and take steps to reduce the potential effects. We apply the Disparate Impact policy to the results of the monitoring activities to determine whether disparate impacts exist.

★ *As mentioned, the bus driver shortage is an example of a cause for discrepancy that is taking significant time to remedy.*

4. If we determine that our prior decisions resulted in a disparate impact on the basis of race, color, or national origin, we will take corrective action to remedy the disparities to the greatest extent possible. We will discuss in the Title VI Program these disparate impacts and actions taken or planned to remedy the disparities.

★ *Refer to 4.4 Challenges in Service Monitoring, Service Delivery, and Service Quality and 4.6 Major Service Change Equity Analyses Report for discussions of actions planned to remedy the headway (frequency) disparities.*

The service performance monitoring comparison applied the service standards and policies from the 2020-2023 Title VI Program Policies for Service Changes & Service Monitoring on RTS Fixed Routes. The service types (service tiers) compared were:

- a. Core Routes: The Core route network operates between the RTS Transit Center and one or more peripheral end points located in the City or in adjacent suburban towns having urban density characteristics (greater than 3,600 persons per square mile). Core routes operate at high frequencies, generally provide all-day service, and operate on weekends. There are two products: Frequent and Local. Core routes with Frequent service travel along major mixed-use corridors with transfer points to other routes and provide 15-minute frequency on weekdays from 6AM-6PM. Core routes with Local service travel to the RTS Transit Center and to the end of the line within corridors. They run with 30-minute frequency on weekdays from 6AM-6PM. The Local service routes also connect to the Frequent network.

- b. **Crosstown/Suburban:** Crosstown routes connect communities without traveling downtown to the RTS Transit Center. These routes connect with other routes that do travel to the RTS Transit Center. Suburban routes are fixed routes that serve a specific suburban area but do not serve the RTS Transit Center. A suburban fixed route may have reduced frequency due to lower demand than an urban fixed route.
- c. **Commuter:** Commuter service means fixed route bus service, characterized by service that runs predominantly in one direction during peak periods, limited stops, and routes of extended length, usually between the central business district and outlying suburbs. The commuter service transports customers to Connection Hubs, where they can transfer to fixed route service.
- d. **Special:** Special routes are designed to serve a specific, popular destination with high demand. An example is the Route 70 Seabreeze, which travels to the Seabreeze Amusement Park. Special routes can also be Seasonal.
- e. **Seasonal:** Seasonal routes operate during a set time. An example is the Route 70 Seabreeze, which operates during the months that the Seabreeze Amusement Park is open for business.

The service performance monitoring comparison for Minority Customer Routes and Non-Minority Customer Routes used data collected from the quarterly Onboard Customer Surveys up to February 2022 (Wave 46), ACS data, and the data for ridership, vehicle load, vehicle headway, vehicle assignment (average age of vehicle), on time performance, bus shelters, and bus stops from quartile one of fiscal year 2022-2023.

On Time Performance (OTP) is measured and reported for the Transit Organization Performance Scorecard (TOPS). TOPS goals are set annually and reported quarterly to the Board of Commissioners and employees.

#### **4.3.B. Service Performance Monitoring Results**

The following tables assess the performance of service on minority and non-minority routes for each of the RTS fixed route Title VI service standards and service policies. The standards and policies that must be monitored are:

- Vehicle Load
- Vehicle Headway
- On-Time Performance
- Service Accessibility
- Vehicle Assignment
- Distribution of Transit Amenities (bus shelters)

Definitions relevant to the service monitoring process are as follows.

- a. *Adverse Effect* shall be related to changes in transit service and shall be measured by the changes between the existing and proposed service levels that are deemed significant. Both reductions and additions in service levels may be deemed adverse depending on the degree of “disparate impact.”
- b. *Disparate Impact* shall mean a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where (i) the recipient’s policy or practice lacks a substantial legitimate justification; and where (ii) there exists one or more alternatives that would service the same legitimate objectives, but with less disproportionate effect on the basis of race, color, or national origin.
- c. *Minority Customers* shall mean RTS customers identifying as any of the groups identified through the RTS fixed route customer surveys or citing a place other than the United States as nation of origin. The groups include Black or African American, Asian, American Indian/Alaskan Native, Hispanic or Latino or Spanish, or Middle Eastern.
- d. *Minority Customer Routes* shall mean those RTS routes that have at least one-third of the revenue miles located in Census block groups where the minority population percentage exceeds the average minority population percentage in the service area. RGRTA may adjust this classification

if route specific ridership data shows that ridership characteristics do not reflect the characteristics of the census blocks through which the route travels.

#### Number of Minority and Non-Minority Routes Comparison

Minority Customer Routes have at least one-third of the revenue miles located in Census block groups where the minority population percentage exceeds the average minority population percentage in the service area. We may classify the route as Minority if our demographic data (Onboard Customer Survey) shows the minority ridership for a route is  $\geq 50\%$ .

#### July 2022 Results—Number of Minority Routes and Non-Minority Routes

We evaluated 32 fixed routes operating at the time of the analysis.	
Minority Routes	26 based on minority % of Census block. Insufficient data to adjust for % of minority ridership. Routes 3, 4, 5, 11, and 22 all have reduced service (Frequency changed from 15-minutes to 30-minutes) due to bus operator shortages. Route 42 has been paused
Non-Minority Routes	6 routes total. There were 2 Local Core Routes, 1 Suburban Route, and 3 Commuter Routes.

#### July 2022 Results—Minority and Non-Minority Routes By Service Type

Service Type (Tier)	Minority Routes	Non-Minority Routes
Core Local	20	2
Core Frequent	3*	0
Suburban	0	1
Special	2	0
Commuter	1	3

*\*A bus operator shortage caused 5 routes to be moved from the Core Frequent tier to the Core Local tier. Under circumstances with enough bus operator staffing, there would be a total of 8 Core Frequent Minority Routes. Details about the bus operator shortage and impact to the routes are in 4.4 Challenges in Service Monitoring, Service Delivery, and Service Quality.*

#### Vehicle Load Comparison

The 2020-2023 load standard determines the minimum and maximum number of customers that RTS service can carry, based on the vehicle's seating capacity and specific to each route service type. RTS aggregates customer counts in half-hour increments for Core Frequent and Local routes. RTS bases load calculations on the peak period's maximum load average for all trips in each direction.

RTS plans its service capacity at 120% of seated capacity, while following the federal crush capacity rule of 150%. For commuter routes, RTS aims to keep the load to a maximum of 100% of seated capacity when operationally feasible. RTS excludes loads below 80% seated capacity as they will not trigger a disparity. In terms of monitoring service levels, there is no disparity for vehicle load when the calculated percentage is less than 20% of the system average or 20% below the system average. These situations indicate that fewer people are on the buses, leaving more empty seats.

#### July 2022 Results—Weekday Peak Load

	Minority	Non-Minority
Core Frequent	9.1	N/A
Core Local	9.9	10.9
Suburban	N/A	6.7
Special	1.0	N/A
Commuter	2.0	5.3
RGRTA finds no discriminatory patterns in the Weekday Peak load factors.		

July 2022 Results—Weekday Off-Peak Load

	Minority	Non-Minority
Core Frequent	8.2	N/A
Core Local	7.9	8.1
Suburban	N/A	3.8
Special	1.3	N/A
Commuter	N/A	2.2
RGRTA finds no discriminatory patterns in the Weekday Off-Peak load factors.		

July 2022 Results—Weekend Load

	Minority	Non-Minority
Core Frequent	8.8	N/A
Core Local	7.8	7.8
Suburban	N/A	1.4
Special	3.4	N/A
Commuter	N/A	N/A
RGRTA finds no discriminatory patterns in the Weekend load factors.		

Headway Comparison

We determine frequency of service by the ridership on each RTS route and performance measures such as on-time performance and pass-up frequency. Routes are required to meet a minimum headway to provide a convenient and effective service for customers.

	Weekdays		Weekends and Holidays	
	Early Morning 5 AM – 6 AM Evening 6 PM – Midnight	Daytime 6 AM – 6 PM	Early Morning 6 AM – 7 AM Evening 6 PM – Midnight	Daytime 7 AM – 6 PM
Core Frequent Network	30 minutes	15 minutes	60 minutes	30 minutes
Core Local Network	60 minutes	30 minutes	60 minutes	60 minutes
Suburban	120 minutes	120 minutes	120 minutes	120 minutes
Seasonal*	60 minutes	30 minutes	60 minutes	60 minutes
Crosstown	60 minutes	30 minutes	60 minutes	60 minutes
Commuter	6 Trips (maximum)	N/A	N/A	N/A

*\*The Seasonal route is a Suburban service type with the same frequency as the Core Local Network.*

The minimum headways established above are the minimum service levels only. The maximum headways shall be determined by the ridership and other performance measures. RTS Connect fixed route service does not have traditional peak and off-peak periods. The closest conceptual “peak” service time is Daytime (6:00 AM to 6:00 PM). As a result, the Early Morning (5:00 AM to 6:00 AM or 6:00 AM to 7:00 AM) and Evening (6:00 PM to Midnight) periods would be equivalent to off-peak service times. The headway for each route shall be driven by these established service times.

Weekend and Holiday service runs Saturdays, Sundays, and major holidays (New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day). All other holidays shall operate on the normal schedule for that day of the week.

July 2022 Results—Headway

The service tiers (types) all contain Minority Routes except Suburban.		
	Frequent	Overall
Minority Route Tiers	100%	81%
RGRTA finds no discriminatory patterns in the headway. *		

*\*As explained in 4.4 Challenges in Service Monitoring, Service Delivery, and Service Quality and 4.6 Major Service Change Equity Analyses Report, the bus operator shortage resulting in moving five Core Frequent Minority routes to the Local service tier. For the Minority Route Comparison conducted in July 2022, the routes were evaluated in the tiers they were assigned to at that time.*

### **Service Availability Comparison**

Access to the transit system is expressed in terms of the travel time required for a customer to get from their point of origin to the nearest bus stop. An individual is generally regarded to have good access to the transit system if the nearest stop is no more than 5 minutes travel time from the point of origin. RTS strives to employ a route structure such that 95% of all residents living in areas of urban density (greater than 3,600 persons per square mile) are afforded walk-on access to the bus and 95% of all residents of suburban areas are afforded automobile access to the bus.

In terms of distance, walk-on access is available to persons residing within ¼ mile of a bus route (5 minutes at 3 mph average walking speed). Auto access is available to persons living up to 2 ½ miles from a route (5 minutes at 30 mph average driving speed). In terms of bus stops, persons living in areas of urban density are afforded at least 4 bus stops per mile and persons living in suburban areas are afforded bus stops not more than 2 miles apart.

### **July 2022 Results**

The standard is that 95% of all residents living in areas of urban density (greater than 3,600 persons per square mile) are afforded walk-on access to the bus, and 95% of all residents of suburban areas are afforded automobile access to the bus.						
	Urban Density			Suburban Density		
	Pop.* within 0.25 Miles of Service	Total Pop.*	% of Pop.* with System Access	Pop.* within 0.25 Miles of Service	Total Pop.*	% of Pop.* with System Access
<b>Minority Service Availability</b>	104830	125480	83.5%	60681	70339	86.3%
<b>Non-Minority Service Availability</b>	56975	85675	66.5%	265939	338941	78.5%
* Population by census tract RGRTA finds no discriminatory patterns in service availability.						

### **Distribution of Transit Amenities**

RGRTA will allow and distribute amenities at selected bus stops and shelters throughout the RTS fixed route service area on an as-needed basis. Amenities may include ATIS signs, bus shelters, benches, trash bins, bike racks, map display, special lighting, or any items or services that would not normally be found at a typical bus stop.

ATIS signs are installed at bus stops where there is a minimum of 200 boardings per day, and shelters (including benches) are installed where there is a minimum of 50 boardings per day. Other amenities are installed on an as-needed basis and may be influenced by other factors such as business partner contributions, new development, and/or the level of other types of traffic. Existing shelters needing replacement will be replaced provided there is a minimum of 25 boardings per day and there have not been three or more incidents of vandalism with a six-month period.

RTS contracts the installation and maintenance of shelters. The Service Planning Department manages the location and upkeep of shelters and other amenities. This data is stored in a Bus Stop Manager Database and the Trapeze system. Amenities may be installed by entities other than RTS. In these cases, the entity that has purchased and installed those amenities shall be responsible for their upkeep and removal, should that become necessary. RTS shall assume no responsibility for such amenities.

RTS installed Connection Hubs throughout the service area at key network convergence points and outer network areas where customers may transfer between multiple fixed route routes or connect to RTS On

Demand to reach their destinations. Connection Hubs have specific types of shelters and amenities.

**July 2022 Results**

The standard is to install bus shelters (including benches) at bus stops where there is a minimum of 50 boardings per day.			
Amenities	# Serving Minority Routes	Total #	% Serving Minority Customer Routes
Bus Shelters	118	147	80%
Connection Hubs	8	10	80%
RGRTA finds no discriminatory patterns in the distribution of bus shelters, including benches.			

**Vehicle Assignment**

The standard is for vehicles to serve specific routes based on the needs of that route, rather than on vehicle attributes such as age, model, or size. However, for the purposes of the performance monitoring, the average age of a vehicle (AAV) is an acceptable indicator of parity.

**July 2022 Results**

	AAV Minority	AAV Non-Minority
Core Frequent	9	N/A
Core Local	9	9
Suburban	N/A	9
Special	6	N/A
Commuter	2	5
RGRTA finds no discriminatory patterns in the vehicle assignment.		

**On Time Performance**

A bus is on time if it does not depart from a time point more than 2 minutes earlier or 5 minutes after the scheduled arrival time.

**July 2022 Results**

The On Time Performance (OTP) goal for fiscal year 2022-2023 was 91.85% for all RTS fixed route service.		
	Average OTP of All Minority Routes	Average OTP of All Non-Minority Routes
Core Frequent	92.87%	N/A
Core Local	91.22%	92.11%
Suburban	N/A	87.27%
Special	70.14%	N/A
Commuter	78.00%	81.34%
RGRTA finds no discriminatory patterns in the relative on-time performance of Minority Routes versus Non-Minority Routes.		

**4.3.C. Transit Organization Performance Scorecard (TOPS)**

All business units are expected to adhere to a set of performance metrics and goals. The scores for these metrics are compiled and reported in the Transit Organization Performance Scorecard (TOPS). All the TOPS measures must be approved by the Board for each upcoming fiscal year. Results are reported to the Board and employees quarterly. The four performance indices are: Financial Performance, Customer Satisfaction, Service Performance, and Employee Engagement. Each index has a success indicator. The success indicator for the Service Performance Index (SPI) is On-Time Performance (OTP).

**4.3.D. Corresponding Exhibit**

[Exhibit 12: Service Monitoring](#) contains the Minority Route Performance Metrics Worksheet, a Q1 2022 Minority Route Comparison spreadsheet with the data used to evaluate performance according to the service standards and service policies criteria (vehicle load, headway, OTP, etc.), and the presentation provided to the Service Monitoring Team on July 20, 2022.



#### 4.4. Challenges in Service Monitoring, Service Delivery, and Service Quality

RTS Connect has three service products: frequent, local, commuter, and Neighborhood Direct Service.

	<b>Frequent</b>	<b>Local</b>	<b>Commuter</b>	<b>Neighborhood Direct Service</b>
<b>Description</b>	Service along major mixed-use corridors with transfer points to other routes	Travel to the RTS Transit Center and to the end of the line within corridors; connect to the Frequent network	Peak time commuter trips connecting outlying areas to the fixed route system	NDS routes are regularly scheduled fixed routes available to the public and travel to various schools in the urban core of Rochester. The urban core has above average minority populations. The service is subsidized by the Rochester City School District.
<b>Service Span</b>	All day 5 AM to midnight	All day 5 AM to midnight	AM/PM Peak	6 AM to 9 AM and 2 PM to 5 PM
<b>Frequency</b>	Every 15 minutes Weekdays 6 AM to 6 PM	Every 30 minutes Weekdays 6 AM to 6 PM	1 to 2 trips per day in each direction	2 trips weekdays when school is in session
<b>Stop Spacing</b>	1/4 to 1/3 mile	1/4 mile	As Needed	As Needed
<b>Vehicles</b>	Standard and/or articulated buses	Standard buses	Small buses and/or standard buses	Standard and/or articulated buses

On September 03, 2021, a bus driver shortage led the Rochester City School District and local and State leaders to ask RTS for assistance. If we reallocated fixed route resources to run a higher number of Neighborhood Direct Service (NDS) routes, students could still attend school in person.

We reasoned that increasing headway has less impact to customers than eliminating Frequent or Local routes. We consider the national workforce shortage in front-line jobs—such as Bus Operators—as an outcome of the COVID-19 pandemic and classified the increased headway as an emergency measure. The RGRTA Board of Commissioners approved an emergency resolution (RGRTA 38-2021) to temporarily change the headways on seven Frequent routes and increase NDS routes to support the District.

On September 13, 2021, RTS Connect increased the headway on seven Frequent service routes to 30-minutes on weekdays from 6:00 AM to 6:00 PM. One Frequent service route continued to operate at 15-minute frequency. We notified customers about the change through [www.myrts.com](http://www.myrts.com), a recorded presentation, social media postings, notices at the Transit Center, and the customer newsletter. We anticipated the situation to be temporary. However, Bus Operator shortages continue to impact RTS Connect service frequency. As of May 2023, five of the routes still operate at 30-minute frequency.

<u><b>September 06, 2021</b></u>	<u><b>September 13, 2021</b></u>	<u><b>January 03, 2022</b></u>	<u><b>May 31, 2023</b></u>
8 Frequent service routes	1 Frequent service route 7 routes w/increased headway	3 Frequent service routes 5 routes w/increased headway	3 Frequent service routes 5 routes w/increased headway

The increased headway creates a Major Service Change on six of the seven routes. Route 11 Monroe does not trigger the criteria for a Major Service Change.

<b>Route</b>	<b>Sep-21</b>	<b>Emer. Sept.</b>	<b>% Change</b>
3	39.9	24.02	-40%
4	43.5	26.17	-40%

Route	Sep-21	Emer. Sept.	% Change
5	51.5	31.73	-38%
8	47.62	28.63	-40%
11	61.77	53.2	-14%
16	48.58	29.33	-40%
22	58.58	42.87	-27%

All six routes exceed the equity threshold for Disproportionate Burden. Five routes exceed the equity threshold for Disparate Impact.

Route	Percent Minority	Percent Low-Income
3	87.2%	43.5%
4	75.0%	40.3%
5	67.6%	31.4%
8	43.9%	25.6%
16	65.4%	35.6%
22	64.3%	30.8%

*Thresholds for Disparate Impact/Disproportionate Burden (120% of service area average): 45.9% minority, 22.7% low-income. All major service changes exceed both thresholds except Route 8, which has Disproportionate Burden only.*

The increased headway **and** equity impact remain for the following routes as of May 31, 2023.

Route	Percent Minority	Percent Low-Income
3	87.2%	43.5%
4	75.0%	40.3%
5	67.6%	31.4%
22	64.3%	30.8%

Along with making an equity mitigation unlikely, the workforce shortage makes RTS Connect more vulnerable to cutting service situationally (too few Bus Operators available for required work). We use a process to guide where service cuts may occur. Commuter and NDS routes are excluded from cuts.

Our intent is to spread trip cuts across the routes. Cutting a few trips from each route reduces the likelihood that a customer is left stranded without an option. Trip cuts are more likely to occur between the morning hours 5:30 AM to 9:30 AM, since that is the period when fewest Bus Operators are available.

We track the level of RTS Bus Operator staffing monthly. Many variables factor into staffing predictions. The current data shows that RTS Connect needs at least 30 additional Bus Operators before it can operate Routes 3, 4, 5, 8, and 22 as Frequent service. Despite assertive recruitment campaigns, RTS has been unable to attain the necessary pool of Bus Operators. The change in NYS CDL Road test requirements has decreased the pass rate for Bus Operator trainees, creating an additional obstacle to attaining the necessary workforce pool. RTS does not expect to mitigate the equity impacts before June 01, 2023. Recruitment, training classes, and attrition will dictate when we have enough Bus Operators to mitigate the increased headway impacts. We will augment efforts to secure funding levels necessary to hire and train more Bus Operators to restore headways to 15-minute frequency as quickly as possible.

#### 4.5. Service and Fare Change Evaluation

RGRTA's *Title VI Program Policies for Service Changes & Service Monitoring* on RTS Fixed Routes contains the materials required for fixed route providers in FTA Circular 4702.1B. These materials are the Service Standards, the Service Policies, and the three equity policies: Major Service Change Policy, Disparate Impact Policy, and Disproportionate Burden Policy. The document is reviewed triennially or as needed.

During the 2020 to 2023 program period, there were no changes to the Major Service Change Policy,



Disparate Impact Policy, and Disproportionate Burden Policy. During the triennial review of the equity policies, no changes were made for the 2023-2026 version.

The equity policies are as follows.

#### **4.5.A. Major Service Change Policy**

Major Service Change shall mean a change or changes in any RTS fixed route other than a subsidized route extension, an experimental route, or a Neighborhood Direct Service route that either changes the number of service hours operated on a route by 25% or more; OR changes the length of the route structure by 25% or more. Route structure refers to the section out of a route based on map coverage rather than based on vehicle miles.

All Major Service Changes and fare changes to RTS fixed routes are subject to a Title VI Equity Analysis prior to approval by the RGRTA Board of Commissioners.

1. The Title VI Equity Analysis shall evaluate Disparate Impact, Disproportionate Burden, Level of Service, and Quality of Service for affected RTS fixed routes.
2. The Title VI Equity Analysis completed for a Major Service Change or fare change must be presented to the RGRTA Board of Commissioners and included in the RGRTA Title VI Program Plan with a record of action taken by the Board.

#### **4.5.B. Disparate Impact Policy**

Any time a Major Service Change or fare change to one or more RTS fixed routes poses a difference in Adverse Effect on Minority Customers versus non-minority customers greater than  $\pm 20\%$  above or below the system average for Minority Customers, the change shall be deemed to have a Disparate Impact.

The 20% threshold shall be based on analyses of RTS customer demographic data and an evaluation of the standard deviation of the route level statistics as compared to the system average. RGRTA excludes subsidized routes from this policy, since RGRTA will not provide such service unless a third party will pay for the service.

In the event the proposed action has a negative impact that affects Minority Customers more than non-minority customers with a disparity that exceeds the adopted Disparate Impact Threshold, or that benefits non-minority customers more than Minority Customers with a disparity that exceeds the adopted Disparate Impact Threshold, RGRTA must evaluate whether there is an alternative that has a more equitable impact.

Otherwise, RGRTA must take measures to mitigate the impact of the proposed action on the affected Minority Customers and demonstrate that both a legitimate business purpose cannot otherwise be accomplished and that the proposed change is the least discriminatory alternative.

##### **Details about the Threshold**

The threshold of 20% was arrived at by first identifying the percentage of wholly or partially minority customers utilizing each route in the system (during a one-year period, based on four quarterly surveys) and then comparing those values to the percentage of wholly or partially minority customers throughout the system. We observed the standard deviation of these variances. Statistical significance was deemed to be  $\alpha = 0.10$  for a 1-tail test (giving us a z-score of 1.282). The standard deviation of the observed variances was 15.7%, giving us a threshold percentage of  $\pm 20.1\%$ . For simplicity, we have standardized this to 20%.

#### **4.5.C. Disproportionate Burden Policy**

Any time a Major Service Change or fare change to one or more RTS fixed routes poses a difference in Adverse Effect on a Low-Income Population versus a non-low-income population of  $\pm 20\%$  above or below

the system average for Low-Income Customers, it shall be deemed to have a Disproportionate Burden.

The 20% threshold shall be based on analyses of RTS customer demographic data and an evaluation of the standard deviation of the route level statistics as compared to the system average.

RGRTA excludes subsidized routes from this policy, since RGRTA will not provide such service unless a third party will pay for the service.

In the event the proposed action has a negative impact that affects Low-Income Customers more than non-low-income customers with a burden that exceeds the adopted Disproportionate Burden Threshold, or that benefits non-low-income customers more than Low-Income Customers with a burden that exceeds the adopted Disproportionate Burden Threshold, RGRTA must evaluate whether there is an alternative that has a more equitable impact.

Otherwise, RGRTA must take measures to mitigate the impact of the proposed action on the affected Low-Income Customers and demonstrate that a legitimate business purpose cannot otherwise be accomplished and that the proposed change is the least discriminatory alternative.

**Details about the Threshold**

The threshold of 20% was arrived at by first identifying the percentage of customers with household incomes below \$15,000 annually utilizing each route in the system (during a one-year period, based on four quarterly surveys) and then comparing those values to the percentage of customers with household incomes below \$15,000 annually throughout the system. We observed the standard deviation of these variances. Statistical significance was deemed to be  $\alpha = 0.10$  for a 1-tail test (giving us a z-score of 1.282). The standard deviation of the observed variances was 15.3%, giving us a threshold percentage of  $\pm 19.6\%$ . For simplicity, we have standardized this to 20%.

**4.5.D. Public Participation for Setting Title VI Policies**

We have not changed the Major Service Change Policy, Disparate Impact Policy, or Disparate Impact Policy substantively since the 2017-2020 program submission. The public participation activities for those policy changes consisted of a period of solicitation of public comment from April 03 to April 21, 2017. During this period, we accepted comments from the public via [www.myrts.com/Contact-us](http://www.myrts.com/Contact-us) and within the forum of two Public Information Sessions.

A preview of the proposed changes to the Title VI Program Plan, including the equity policies, was posted on <http://www.myrts.com/titleVI> on April 03, 2017. The preview outlined the upcoming Public Information Sessions, the ways people could participate, and the proposed changes. We promoted Public Information Sessions from April 03 through April 20, 2017, using the following channels:

1. RTS Customer E-newsletter: Distributed April 12, 2017, via email to 5,189 subscribers.
2. Postings on the myRTS.com Homepage
3. Posters onboard the RTS bus fleet
4. Messages displayed on the Digital Display Monitors at the gates in the RTS Transit Center
5. Facebook and Twitter posts
6. Text message notification to 241 subscribers

We held two Public Information Sessions at the RGRTA Administration Building, 1372 East Main Street Rochester NY 14609:

- April 18, 2017, from 5:30 – 6:30 pm
- April 20, 2017, from 11:00 am – 12:00 pm

Public transportation to the meeting location was available through the RTS bus system. A certified

American Sign Language Interpreter was present at both sessions, although no deaf persons or persons with hearing loss attended. Each session was attended by one member of the public. The attendees were offered comment cards and were asked to sign-in. Each session included a PowerPoint presentation of the requirements of the Title VI Program and our proposed changes for 2017-2020 led by General Counsel, the Public Information Officer, and the Supervisor of Marketing and Communications. Attendees were given ample time for questions and comments. While comments from any member of the public were accepted until April 21, 2017, RTS received none beyond those offered during the sessions. The comments and concerns were not specific to the proposed Title VI Program Plan, 2017-2020.

We will provide Exhibit 7.B from the 2017-2020 Title VI Program Plan Submission to the Region 2 Civil Rights Officer or another FTA official upon request.

There are no revisions to the Major Service Change Policy, Disparate Impact Policy, and Disproportionate Burden Policy in the *2023-2026 Title VI Program Policies for Service Changes & Service Monitoring on RTS Fixed Routes*. As a result, the policies did not go for public comment through Public Information Sessions or a public hearing. The document will be posted on the <https://www.myrts.com/titleVI>, making it available for ongoing public comment via the Contact Us online form or by calling Customer Service.

#### **4.5.E. Service And Fare Equity (SAFE) Analyses**

Service and fare equity analyses occur prior to the implementation of a major service change or a fare change to determine whether the change will have a disparate impact on the basis of race, color, or national origin or create a disproportionate burden on the basis of low income. RGRTA shall:

- Use ridership as the comparison population and compare the ridership of the affected routes with the ridership of the system.
- Use ridership data from customer surveys and ACS census data to compare income levels and identify populations affected by changes to the fare structure.

The departments initiating the changes (service, fare, both) shall engage the Business Analyst\* to perform the analyses. Whenever a minority population is present, the Business Analyst will apply the Disparate Impact Analysis. Whenever a low-income population is present, the Business Analyst will apply the Disproportionate Burden Analysis.

<b>Population</b>	<b>Equity Analysis to Use</b>
<b>Minority Only</b>	Disparate Impact
<b>Minority that is also Low Income</b>	Disparate Impact
<b>Low-Income Only</b>	Disproportionate Burden

The department responsible for proposing the change shall put the equity analyses results in a Title VI Evaluation Memo. The results are reported to the General Counsel, the Policies, Procedures and Technical Documents Manager\*, the Department Director, and the CEO.

*\*Or whatever job function is most appropriate. The Business Analyst function currently compiles data on past service performance and analyzes the potential impact of future service recommendations. The Policies, Procedures, and Technical Documents Manager currently compiles the material required to report on Title VI compliance.*

If there are no adverse impacts, the CEO includes the results in a report to the Board of Commissioners and the responsible department(s) will proceed with implementing the change. If the results indicate adverse effects to minority populations or low-income populations, the Department Director:

1. Works with supporting departments to identify strategies for reducing, mitigating, or eliminating the adverse effect; and

2. Integrates adjustments to the proposed change; and
3. Engages the Business Analyst to perform another analysis to confirm that:
  - The adjustments do not introduce new adverse effect; and
  - The adjustments address the original adverse effect (reduce, mitigate, or eliminate).
4. The Business Analyst reports the results of the analyses to the General Counsel, the Policies, Procedures and Technical Documents Manager, Department Director, and CEO.
5. If the adverse impacts are resolved, the CEO includes the results in a monthly report to the Board of Commissioners for review. Upon the Board's acceptance of the CEO report, the responsible department(s) will proceed with implementing the proposed service change or fare change.
6. If the adverse impacts persist, the CEO engages the Executive Management Team members and Leadership Team members to identify alternatives or supporting evidence.

#### **4.5.F. Evaluation Procedures**

RTS shall follow the directives and apply the thresholds and definitions found in the Major Service Change Policy, Disparate Impact Policy, and Disproportionate Burden Policy.

##### **Service Change Evaluation**

1. The Service Planning Department uses performance data from the monthly service monitoring metrics worksheet to identify whether one or more fixed routes require corrective action. External factors such as the need for NDS routes, major road construction projects, a safety hazard, or a specific community need may result in changes to existing routes or the creation of new routes. Changes are defined and proposed during the Monthly Service Monitoring Team meetings.
2. The Transportation Planner II applies the Major Service Change criteria to determine whether a proposed service change meets the defined threshold to trigger the required equity analyses. When a proposed service change fits the criteria for a Major Service Change, the Transportation Planner II and Business Analyst II perform the appropriate equity analysis using ridership and demographic data from the Onboard Customer Survey, affected census tracts, and ACS survey data.
3. When the analysis shows adverse effect (disparate impact, disproportionate burden), the Service Planning department propose mitigations. The Business Analyst II completes a service equity analysis on the mitigation to determine whether it addresses the adverse effects or introduces new adverse effects. The Transportation Planner II prepares a Title VI Evaluation Memo.
4. The Communications and Customer Engagement Department organizes communication materials and events, such as Open Houses, to educate and seek feedback.
5. The CEO notifies the Board of Commissioners about the service changes, impacts, and mitigations through the CEO Report prepared for monthly Board meetings. The Board's acceptance of the report is indicated in the meeting minutes.

##### **Fare Change Evaluation**

1. Departments under Finance and the Executive Management team may use financial data, data on available funding, and revenue data to determine the need for a change to a fare amount. The same group may evaluate Customer Survey data, benchmarking information (ABBG), and community input to determine the need for a change to fare media.
2. If Finance proposes a fare amount or fare media change, Finance shall notify Legal Affairs and the Business Analyst II. The departments shall perform an equity analysis that includes the following steps.

- a. Determine the number and percent of users of each fare media or fare amount, based on information from RTS Onboard Customer Surveys. Specifically, data on annual income level, occupational status (employment), trip transfers, frequency level for riding the bus, and payment method used, and racial/ethnic identity.
  - b. Utilize current and historical ridership data gathered from Automatic People Counters and the Customer Surveys onboard the buses.
  - c. Review fares before and after the proposed change.
  - d. Compare fare payment by ridership group for fare media usage variation among low-income riders, minority riders, and overall ridership.
  - e. Compare fare payment patterns for minority versus non-minority and low-income versus higher-income riders.
  - f. Compare impacts of the change on minority customers to impacts on overall customers.
  - g. Compare impacts of the change on low-income customers to impacts on overall customers.
  - h. Determine whether there will be a disparate impact on minority customers.
  - i. Determine whether there will be a disproportionate burden on low-income customers.
3. The results will be collectively reported to and reviewed by the departments and Executive Management.
4. If there appears to be a disparate impact, the team will analyze alternatives that would have a less disparate impact on minority customers, while still accomplishing the program goals for the fare change.
5. If there appears to be a disproportionate burden, the team will identify steps RGRTA will take to avoid, minimize, or mitigate impacts where practicable, and/or describe alternatives available to those affected by the fare change.
6. The team will analyze any alternative transit modes, fare payment types, or fare media available for people affected by the fare change. The analysis will also:
  - a. Compare fares paid by the proposed changes with fares that would be paid through available alternatives.
  - b. Show whether vendors that distribute/sell the fare media are located in areas that would be convenient to impacted populations.
7. If the team determines that a disparate impact exists and RGRTA will make the fare changes despite these impacts, RGRTA must clearly demonstrate a substantial legitimate justification for the proposed fare changes; and clearly demonstrate that RGRTA analyzed alternatives to determine whether the proposed fare changes are the least discriminatory alternative.
8. If the team determines a disparate impact or a disproportionate burden, they must explore alternatives and mitigation, including the timing of implementing the fare change, providing discounts on passes to social service agencies that serve the impacted populations, and other alternatives as appropriate.
9. The team prepares a final report. The Communications and Customer Engagement Department organizes communication materials and events, such as Open Houses, to educate and seek feedback and a public hearing when necessary.
10. The CEO notifies the Board of Commissioners about the fare changes, impacts, and mitigations through the CEO Report prepared for monthly Board meetings. The Board's acceptance of the report is indicated in the meeting minutes.



## 4.6. Major Service Change Equity Analyses Report

During the 2017-2020 period, the Reimagine RTS system redesign was an unequivocal Major Service Change. RGRTA engaged the contracted vendor Transportation Management & Design, Inc. (“TMD”) to conduct a service equity analysis for Disparate Impact and Disproportionate Burden. TMD did so in August 2018 and found no disparities. As adjustments were made due to public participation, RGRTA engaged the internal Business Analyst to perform a second Major Service Change Equity Analysis. The second analysis occurred in January 2019 and found no disparities. The full equity analysis report went before the Board of Commissioners for their consideration, awareness, and approval on November 05, 2020. The *2018 Reimagine RTS Service Equity Analysis with 2019 Addendum and the Final Recommendation Report* were submitted to the FTA in the 2020-2023 Title VI Program Plan on October 1, 2020. The launch of the new system was postponed until May 17, 2021, due to the COVID-19 pandemic.

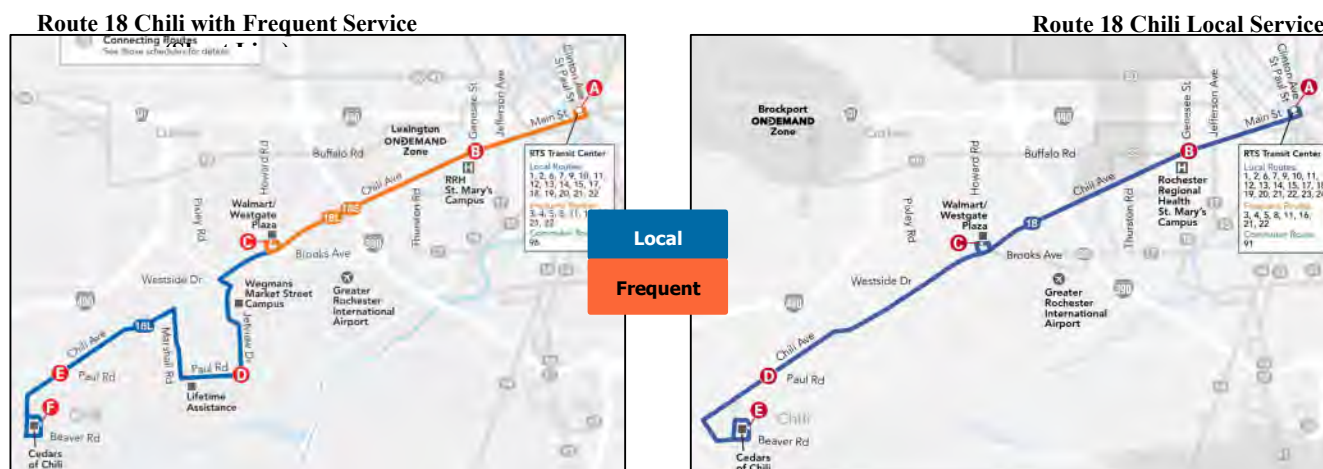
Since the Major Service Change equity analyses for Reimagine RTS were submitted to the FTA in October 2020, the report is not included in this program submission. We will provide the report, if necessary, upon the request of the Region 2 Civil Rights Officer or another FTA official.

The following equity analyses were performed for Major Service Changes occurring after the May 17, 2021, launch of Reimagine RTS. The analyses occurred for Major Service Changes to the RTS Connect fixed route system from September 06, 2021 to January 02, 2023, which demonstrated Disparate Impact and Disproportionate Burden. RGRTA provided a report of the changes to the Board of Commissioners on May 04, 2023. The corresponding exhibit to this section includes all Title VI Evaluation Memos prepared since the last submission.

### 4.6.A. Major Service Changes with Equity Impacts and Mitigations

#### Changing the 18 Chili Short Line Frequent Route to a Local Route

The 18 Chili has a “short line” Frequent service portion and a “long line” Local service portion. The Local service provided 30-minute frequency 6am-6pm weekdays and served Walmart/Westgate Plaza to Cedars of Chili Apartments. The Frequent service provided 15-minute frequency 6am-6pm weekdays Downtown to Walmart/Westgate Plaza. The Frequent service to Jetview Drive had low ridership, with on- and off-boardings averaging 0.35 customers per trip. Removing the short line Frequent service portion would provide Local service on the entire route. The Jetview Drive portion was removed, all in-bound trips were shifted, and one weekend trip was added. The modified 18 Chili serves the RTS Transit Center, Rochester Housing Authority, RRH St. Mary’s Hospital, Walmart on Chili Ave, Chili-Paul Plaza, and Cedars of Chili Apartments.





Major Service Change	Minority Route	Equity Impacts	Mitigation	Date Effective
Yes	Yes	Disparate Impact and Disproportionate Burden	Yes. Add new Local route 23 West Avenue/Airport.	09/06/2021

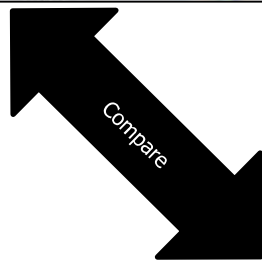
**Mitigation for Changing Frequent portion of 18 Chili to Local Service**

A new Route 23 West Ave/Airport covers West Ave, Genesee Park Blvd, the Airport loop, the Wegmans Distribution Center, and the Chili Av. Walmart. Route 23 West Ave/Airport provides Local service 7 days a week with 30-minute frequency 6am-6pm weekdays. Route 23 provides additional service options along West Main and to Chili Walmart. The route serves Tops – West Avenue, Danforth Community Center, Rochester International Airport, Wegmans Distribution Center, and Walmart – Chili Avenue. A portion of the 23 West Ave/Airport travels into the Lexington On Demand zone.

*Route 23 West Avenue / Airport Local*



*Route 18 Chili Local*



**Increasing Headway on Frequent Routes 3 Joseph Avenue, 4 Hudson Avenue, 5 Portland Avenue, 8 East Main Street, 16 Genesee Street, and 22 Lake Avenue**

An emergency measure was approved by the Board of Commissioners (Resolution RGRTA 38-2021) to increase the headway from 15-minutes to 30-minutes from 6:00 AM to 6:00 PM weekdays, which makes the routes behave like Local routes. The change in revenue hours is due to discontinuing 15-minute service and implementing 30-minute headway. There is no change or reduction in routing. The change was considered temporary and due to workforce shortages resulting from the COVID-19 pandemic. The change allowed RTS to reallocate resources to provide increased NDS routes to assist Rochester City School District in transporting students to schools within the urban core of Rochester.

Major Service Change	Minority Route	Equity Impacts	Mitigation	Dates Effective
Yes	Yes, all routes.	Disparate Impact: 3 Joseph, 4 Hudson, 5 Portland, 16 Genesee, and 22 Lake Disproportionate Burden: 3 Joseph, 4 Hudson, 5 Portland, 8 East Main Street, 16 Genesee, and 22 Lake	No equitable alternatives exist without a larger available workforce. RTS has increased efforts to hire Bus Operators, including advertising and holding “job fair” events. We will decrease headways on affected Minority Customer Routes when enough Bus Operators are available, with priority for those with highest customer demand.	09/13/2021 to 01/02/2022

**Updates**

15-minute frequency was restored to 16 Genesee and 8 East Main on 01/03/2022. The analysis becomes as follows.

Major Service Change	Minority Route	Equity Impacts	Mitigation	Dates Effective
Yes	Yes, all routes.	Disparate Impact and Disproportionate Burden: 3 Joseph, 4 Hudson, 5 Portland, and 22 Lake	No equitable alternatives exist without a larger available workforce. RTS has increased efforts to hire Bus Operators, including advertising and holding “job fair” events. We will decrease headways on affected Minority Customer Routes when enough Bus Operators are available, with priority for those with highest customer demand.	01/03/2022 to present

**Mitigation for Increased Headways on Routes 3, 4, 5, and 22**

RTS tracks the level of Bus Operator staffing monthly. RTS Connect needs at least 30 additional Bus Operators before it can operate Routes 3, 4, 5, and 22 as Frequent service. Despite assertive recruitment campaigns, RTS has been unable to attain the necessary pool of Bus Operators. The change in NYS CDL Road test requirements has decreased the pass rate for Bus Operator trainees, creating an additional obstacle to attaining the necessary workforce pool. RTS does not expect to mitigate the equity impacts before June 01, 2023. Recruitment, trainee pass rates, and attrition will dictate when RTS has enough Bus Operators to mitigate the increased headway impacts.

RTS will augment efforts to secure funding levels necessary to hire and train more Bus Operators to restore headways to 15-minute frequency as quickly as possible.

**Discontinue 71 Public Market Special**

The route was added to the system September 06, 2021, to serve the Rochester Public Market on Thursdays from 9:00 AM to 12:30 PM and Saturdays from 8:00 AM to 12:30 PM. During the one year it was active, the route proved to be popular. Customers voiced frustration that the route did not serve more than the Public

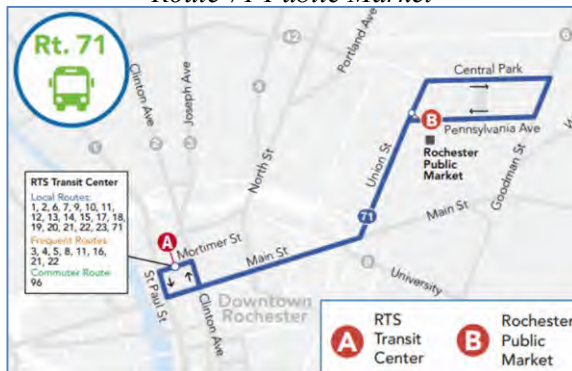
Market, indicating demand for service with more coverage and more stops. The route will be replaced with Local Route 24 Bay Street.

Major Service Change	Minority Route	Equity Impacts	Mitigation	Date Effective
Yes	Yes	Disparate Impact and Disproportionate Burden	Yes. A new Local route (24 Bay Street) which serves the Public Market and provides additional service coverage will mitigate the equity impacts.	09/05/2022

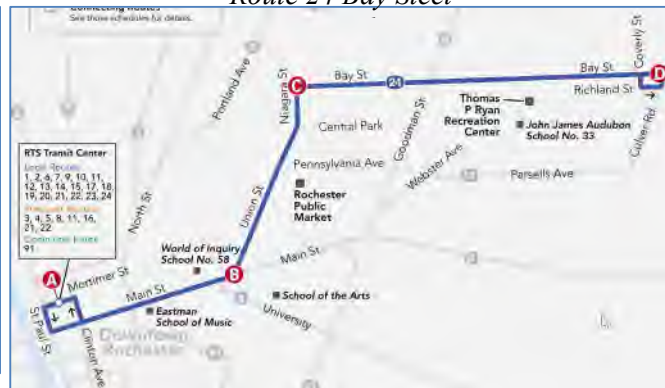
#### **New Local Route 24 Bay Street**

The new route provides Local service that travels to the Rochester Public Market during the days and times when the Market is open, and provides service to Eastman School of Music, World of Inquiry School #58, Thomas P. Ryan Recreation Center, and John James Audubon School #33 weekdays 5:00 AM to Midnight and weekends 6:00 AM to Midnight. The route travels from the RTS Transit Center > Main Street & Kenilworth Terrace > Bay Street & Niagara Street > Bay Street & Culver Road. As a Local service route, the 24 Bay Street has bus stops spaced every ¼ mile along the route, is served by standard 40-foot buses, and has 30-minute frequency weekdays from 6:00 AM to 6:00 PM. The new route mitigates the equity impacts of discontinuing the 71 Public Market Special. A comparison of the two routes is shown below.

*Route 71 Public Market*



*Route 24 Bay Street*



#### **Discontinue 98 Lexington Commuter Route**

The performance of the 98 Lexington Commuter route was evaluated monthly and consistently showed low ridership, with several months of data showing ridership well below 75% Commuter Average. The ridership in November 2022 was at -21% compared with -10% ridership in November 2021, showing a persistent declining trend.

Major Service Change	Minority Route	Equity Impacts	Mitigation	Date Effective
Yes	Yes	Disparate Impact and Disproportionate Burden	Yes. Add one more vehicle to the fleet serving the Lexington On Demand Zone to increase capacity from 5:00 AM to 8:00 AM during weekdays. The 98 Lexington route ran within the Lexington On Demand Zone. Commuters can use the On Demand service to reach the same destinations served by the 98 Lexington.	01/02/2023

**Mitigation for Discontinuing 98 Lexington**

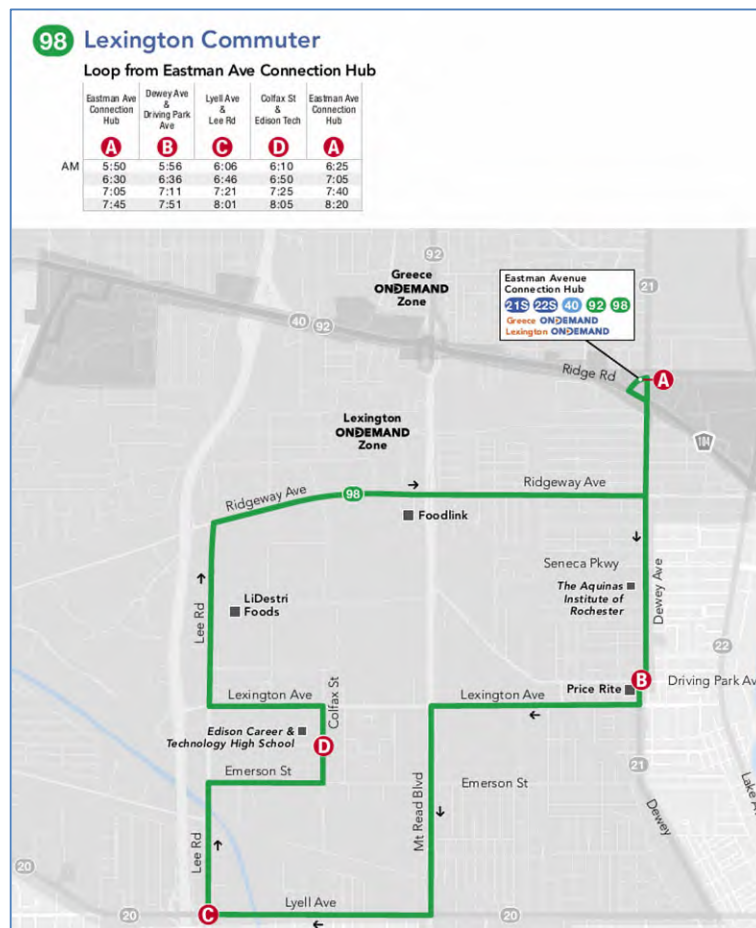
The 98 Lexington Commuter:

- Travels within the Lexington On Demand Zone, serving Eastman Avenue Connection Hub, Edison Tech High School, and LiDestri Foods; and
- Runs four morning trips during weekdays;
- Operates 5:50 AM to 8:20 AM; and
- Costs \$1 (or \$0.50 reduced fare) per trip; and
- Begins and ends at the Eastman Avenue Connection Hub within the Lexington On Demand Zone.

**RTS On Demand service in the Lexington On Demand Zone**

- Is available for the commuter destinations during the same days and times that the 98 Lexington is available; and
- Costs \$1 (or \$0.50 reduced fare) per trip to travel to or from the East Avenue Connection Hub.

Adding another vehicle to the On Demand fleet during the 5:00 AM to 8:00 AM window when the commuter trips occur should increase capacity to meet the customer demand indicated by the ridership on the 98 Lexington fixed route. Disparate Impact is mitigated because the same geographic area, destinations, and timeframes are served by the On Demand service. Disproportionate Burden is mitigated because the fare amount does not change for commuters switching from fixed route to demand responsive.





**4.6.B. Corresponding Exhibit**

The Title VI Evaluation Memos for service changes are available in [Exhibit 13: Major Service Change Reports](#).

**4.7. Fare Changes**

When the Board of Commissioners approved the Reimagine RTS Service Plan on June 27, 2019, it approved a fare change to provide reduced fare to Persons with Disabilities and Persons age 65+ during the entire transit day, rather than just during non-peak hours. It also approved free fare for Military Veterans. The fare changes were planned to go into effect with the original start of Reimagine RTS on June 29, 2020. The fare changes originated from public participation input during the 2017-2018 public participation process and were presented during the public hearing for Reimagine RTS.

Additionally, in 2018 the Information Technology Department proposed a fare technology and fare media change to integrate account-based ticketing ("RTS Go"). The change would allow customers to use mobile technology (smart phones) and reloadable smart cards as fare media and allow customers to set up fare accounts to which they could add value using credit/debit cards or cash. The Board of Commissioners approved the development of RTS Go fare technology on September 06, 2018 but the change did not go into effect until July 15, 2020 after a fare equity analysis was conducted and approved.

On March 19, 2020, the Board approved temporary elimination of fares on all services, including fixed route, to promote safety during the COVID-19 pandemic. RTS resumed collecting fares in July 2020 using the RTS Go technology.

In response to COVID-19 and in an effort to make front-door boarding and fare payment quicker and safer for customers and Bus Operators, RTS performed a fare equity analysis to determine what impacts may exist prior to implementing the fare technology change. A Disproportionate Burden was identified for low-income customers. As a result, RGRTA identified mitigations to reduce the adverse impact to low-income customers. On June 25, 2020, the Chief Operating Officer presented the fare changes, and the equity impacts of the RTS Go system implementation as part of the monthly CEO Report to the Board of Commissioners. The presentation identified the disproportionate burden to low-income customers who do not have access to a credit card or bank account and the mitigations to reduce adverse impact during the RTS Go implementation. The Board raised no concerns or questions regarding the planned mitigations. As a result, the new fare technology and media went into effect on July 15, 2020, along with the reduced fare and Military Veteran fare changes. The RTS Go Fare Equity Analysis Report was approved by Board of Commissioners during the November 05, 2020 Board meeting and submitted to the FTA with the Title VI Program Plan 2020-2023 on October 01, 2020.

There were no changes to fare amounts or fare media during the 2020-2023 period. We did enact further adjustments to the fare collection system to make fare capping, purchasing fare media, and reloading fare media more equitable for populations without access to a credit card or bank account.

1. Around August 15, 2022, we announced to customers that we had partnered with VanillaDirect, a retail network that allows people to reload their RTS Go account at 99 stores across Monroe County. People can add funds to RTS Go at stores like Walmart, Family Dollar, and 7Eleven.
2. In February 2023, we partnered with 99 retail stores to sell RTS Go cards in the stores (in kiosks along with other types of loadable cards or gift cards).

The ability to purchase an RTS Go card at a local store makes the smartcard available for a larger population, who previously had to purchase the cards at a Ticket Vending Machine located at the RTS Transit Center or at the RTS main campus on 1372 East Main Street, Rochester NY 14609. Further, now the cards allow people to reload them in a similar network of 99 retail stores. The change allows people who normally use

cash for transactions and may not have access to a credit card account or bank account, to purchase and reload their cards at accessible locations using cash. Having the RTS Go card gives customers the benefit of fare capping, which is not available if each trip is paid for onboard the bus with cash.

Broadening the availability of the RTS Go Cards and providing options for people to reload the cards with cash at a retailer extends the benefit of fare capping to more customers.





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## EXHIBITS

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# Exhibit 01: Organizational Overview

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## BUSINESS STRUCTURE

The Rochester Genesee Regional Transportation Authority (RGRTA) is a public benefit corporation and a component unit of the State of New York. Created in 1969 by an act of the State Legislature, the Authority is charged with the continuance, further development, and improvement of public transportation and other related services within the Genesee/Finger Lakes region. Since 1969, membership in the Authority has grown to eight counties with a total land area of 4,350 square miles and a population of approximately 1.2 million. Current member counties include Genesee, Livingston, Monroe, Ontario, Orleans, Seneca, Wayne, and Wyoming.

RGRTA's services encompass urban, suburban, and rural areas, as well as complementary paratransit service in compliance with the Americans with Disabilities Act (ADA).



### The Authority is comprised of 11 separately incorporated business units:

1. Rochester Genesee Regional Transportation Authority (RGRTA)
2. Regional Transit Service, Inc. (RTS)
3. RTS Access (Lift Line, Inc.)
4. RTS Genesee (Batavia Bus Service, Inc.)
5. RTS Livingston (Livingston Area Transportation Service, Inc.)
6. RTS Ontario (County Area Transit Service, Inc.)
7. RTS Orleans (Orleans Transit Service, Inc.)
8. RTS Seneca (Seneca Transit Service, Inc.)
9. RTS Wayne (Wayne Area Transportation Service, Inc.)
10. RTS Wyoming (Wyoming Transit Service, Inc.)
11. Genesee Transportation Council Staff, Inc. (GTCS)

### RGRTA Snapshot\*

**2022 Ridership:** 8,099,254

**No. of Buses:** 401

**No. of Employees:** 1,000+

**Service Area Population:** 1,196,531

**Annual Miles:** 10,118,209

**Counties Served:** Genesee, Livingston, Monroe, Ontario, Orleans, Seneca, Wayne, Wyoming

**RTS**

The largest subsidiary of the Authority, providing 31 fixed routes throughout Monroe County and into adjoining counties.

**Created in 1969**

<b>2022 Ridership:</b>	7,544,441
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<b>No. of Buses:</b>	223
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<b>No. of Employees:</b>	674
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<b>Service Area Population:</b>	755,160
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**RTS LIVINGSTON**

Provides service on four deviated routes and Dial-A-Ride service.

**Joined RGRTA in 1986**

<b>2022 Ridership:</b>	74,250
------------------------	--------

<b>No. of Buses:</b>	19
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<b>No. of Employees:</b>	26
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<b>Service Area Population:</b>	62,914
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**RTS SENECA**

Provides service on three deviated routes and Dial-A-Ride service.

**Joined RGRTA in 2004**

<b>2022 Ridership:</b>	37,195
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<b>No. of Buses:</b>	8
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<b>No. of Employees:</b>	14
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<b>Service Area Population:</b>	34,016
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**RTS ACCESS**

Provides paratransit service within Monroe County in accordance with the Americans with Disabilities Act (ADA) to eligible customers.

**Created in 1985**

<b>2022 Ridership:</b>	160,270
------------------------	---------

<b>No. of Buses:</b>	53
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<b>No. of Employees:</b>	120
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<b>Service Area Population:</b>	755,160
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**RTS ONTARIO**

Provides service on seven deviated routes and Dial-A-Ride service.

**Joined RGRTA in 2014**

<b>2022 Ridership:</b>	133,731
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<b>No. of Buses:</b>	21
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<b>No. of Employees:</b>	38
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<b>Service Area Population:</b>	109,777
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**RTS WAYNE**

Provides service on 10 deviated routes and Dial-A-Ride service.

**Joined RGRTA in 1980**

<b>2022 Ridership:</b>	88,904
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<b>No. of Buses:</b>	42
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<b>No. of Employees:</b>	61
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<b>Service Area Population:</b>	89,918
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**RTS GENESEE**

Provides service on four deviated routes and Dial-A-Ride service.

**Joined RGRTA in 1971**

<b>2022 Ridership:</b>	26,299
------------------------	--------

<b>No. of Buses:</b>	12
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<b>No. of Employees:</b>	16
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<b>Service Area Population:</b>	57,280
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**RTS ORLEANS**

Provides service on four deviated routes and Dial-A-Ride service.

**Joined RGRTA in 2003**

<b>2022 Ridership:</b>	23,183
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<b>No. of Buses:</b>	6
----------------------	---

<b>No. of Employees:</b>	13
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<b>Service Area Population:</b>	40,352
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**RTS WYOMING**

Provides service on seven deviated routes.

**Joined RGRTA in 1993**

<b>2022 Ridership:</b>	46,604
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<b>No. of Buses:</b>	18
----------------------	----

<b>No. of Employees:</b>	19
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<b>Service Area Population:</b>	40,305
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## BOARD OF COMMISSIONERS & GOVERNANCE STRUCTURE

A sixteen-member Board of Commissioners\* establishes policy and sets direction for the management of the Authority. The Commissioners are residents of the member counties who have been recommended by their respective local governing bodies, appointed by the Governor of New York State, and confirmed by the New York State Senate. Board membership is apportioned among the member counties based in accordance with the Authority's enabling legislation. Current membership is as follows: City of Rochester: three; Monroe County: four\*\*; and one member each from Genesee\*\*\*, Livingston, Ontario, Orleans, Seneca, Wayne, and Wyoming counties. The Authority has separate legal standing from each of the member counties.

The Board of Commissioners schedules at least one meeting each month that is open to the public. All public meetings of the Board are recorded and streamed live for viewing on the Authority's website: [myRTS.com](https://myRTS.com).

\*Included on the Board of Commissioners is a representative of the ATU and a representative of transit dependent & paratransit customers.

\*\*Of the four seats representing Monroe County one is currently vacant.

\*\*\*The Genesee County seat is currently vacant.

## COMMITTEES

*Four standing committees assist the RGRTA Board of Commissioners in carrying out its duties.*

### GOVERNANCE COMMITTEE

- Reviews corporate governance trends and keeps the Board of Commissioners informed of current best governance practices
- Updates the Authority's corporate governance principles and practices when necessary
- Formulates and proposes to the full Board for adoption, policies that promote honest and ethical conduct by Authority Commissioners, officers, and employees

### AUDIT COMMITTEE

- Represents and assists the Board of Commissioners in its general oversight of the Authority's accounting and financial reporting processes, audits of the financial statements, and internal control functions
- Has direct responsibility for engagement, communication, and oversight of the independent audit function

### COMPENSATION COMMITTEE

- Discharges the Board's responsibility related to compensation of the Authority's executive officers and other employees
- Oversees the Authority's succession planning program, and assists in relating Authority performance to executive and employee compensation

### FINANCE/INVESTMENT COMMITTEE

- Represents and assists the Board in its general oversight of the Authority's borrowing and investment activities
- Formulates investment policy of the Authority, monitors the system of internal controls with respect to the investment policy, and reviews any independent audits of the investment program

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The Board of Commissioners schedules at least one meeting each month that is open to the public. All public meetings of the Board are recorded and streamed live for viewing on the Authority's website: [myRTS.com](https://myRTS.com).

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#### **WILLIAM ANSBROW**

*City of Rochester, Appointed in 2017*

CFO, Mary Cariola Children's Center, Inc. • CFO (retired), Rochester City School District  
 • Former Budget Director, City of Rochester • Graduate of Indiana University, Masters of Public Finance • Graduate of Canisius College, B.S.

#### **Community Service:**

*Board Member, Rochester Children's Scholarship Fund*

**JAMES BENSLEY***Orleans County, Appointed in 2019*

Orleans County Department of Planning and Development Director • Orleans County Recycling Coordinator • Orleans County Salary Review Committee • Lecturer (adjunct), Buffalo State College • Graduate of Virginia Polytechnic Institute and State University • Masters of Urban and Regional Planning • Graduate of Buffalo State College, B.S.

**Community Service:**

*Member, American Institute of Certified Planners; Member, Genesee/Finger Lakes Regional Planning Council; Board Member, County Agricultural and Farmland Protection; Leadership Orleans Participant*

**HEATHER BIRD***Non-Voting Member, Appointed in 2022*

President, National Federation of the Blind of New York State, Inc., Rochester Chapter • President, New York Association of Guide Dog Users • Secretary, New York Parents of Blind Children • Board Member, Alumnus, National Federation of the Blind of New York State, Inc., The Seeing Eye

**Community Service:**

*BELL Coordinator; National Organization of Blind Veterans; National Organization of Parents of Blind Children; Past Member, Board of the National Association of Guide Dog Users*

**SUSANNE CARLOCK***Livingston County, Appointed in 2021*

Director, Livingston County Office for the Aging • Former CEO, The Community Place of Greater Rochester, Inc. • Graduate of SUNY Geneseo and Keuka College

**Community Service:**

*Board Member, Association on Aging in New York; Board Member, Livingston County Emergency Food and Shelter Program; Former Board Member, Genesee Valley Health Partnership; Livingston County Worker United Way Campaign Committee Member*

**JACQUES CHAPMAN***ATU Local 282, Appointed in 2018*

International Vice President, Amalgamated Transit Union • Former President, ATU Local 282 • Former RTS Bus Operator • Past Executive Board Member, ATU Local 282

**Community Service:**

*Past Recording Secretary, ATU New York State Legislative Conference Board; Our Streets Transit Coalition; Executive Board, WIT Federal Credit Union*

**MICHAEL P. JANKOWSKI***Wayne County, Appointed in 2004*

Wayne County Clerk • Graduate of St. John Fisher College and the National Academy for Paralegal Studies, Inc.

**Community Service:**

*Member, New York State County Clerks Association; 2008 Chairman, Wayne County United Way Campaign; Board of Directors, Newark-Wayne Community Hospital; Board of Directors, Wayne County Action Program*


**DONALD E. JEFFRIES, BOARD CHAIRMAN**

*Monroe County, Appointed in 2016*

President and CEO of Visit Rochester • Graduate of St. John Fisher College

**Community Service:**

*Trustee, St. John Fisher College; Director, Monroe Community College Foundation; Director, Rochester Area Crime Stoppers; Director, Seneca Waterways Council Boy Scouts of America; Commissioner, Brighton Fire District; Member, Brighton Fire Department; Director, Rochester Riverside Convention Center; Director, New York State Hospitality and Tourism Board; President, New York State Destination Management Association; President, ROC2025 Leadership Group; Rochester Rotary; Director, 911 Operating Practices Board*


**JERDINE JOHNSON, BOARD SECRETARY**

*City of Rochester, Appointed in 2017*

Manager of Energy Conservation and Deputy Commissioner • Department of Environmental Services at the City of Rochester (retired) • Former Executive Director, Eastside Community Center • Former Executive Director, North East Block Club • Graduate of the Pratt Institute, Masters of Urban and Regional Planning • Graduate of Florida A&M University, B.S.

**Community Service:**

*Past President, National Associations of Negro Business and Professional Women; Sergeant at Arms, Rochester Downtown Rotary; Treasurer, Statewide Neighborhood Preservation Coalition; Past Member, Goodwill of the Finger Lakes Board of Directors*


**RICHARD D. KOSMERL, BOARD TREASURER**

*Wyoming County, Appointed in 2016*

North American Director of Quality, Plant Manager, Division President, General Manager, and Executive Vice President, Prestolite Electric Inc. (retired)

**Community Service:**

*President, Wyoming County Community Health System Board of Managers; Past Board of Directors and Board VP, Community Action for Wyoming County; Member, Village and Town of Arcade Planning Board; Past Trustee and Mayor, Village of Arcade; Former member of curriculum advisory boards for Business Management and Microelectronic Engineering at Genesee Community College and Rochester Institute of Technology, respectively*


**WILLIAM P. MCDONALD**

*City of Rochester, Appointed in 2017*

Mobility Management Consultant with a focus on transportation services for older adults and persons with disabilities (current) • United Way of Greater Rochester and the Finger Lakes: Strategic Initiatives Coordinator/Program Officer (former) • Executive Director, Medical Motor Service of Rochester and Monroe County, Inc., Retired • Monroe County Office for the Aging program administrator • Graduate of SUNY Brockport, Masters of Public Administration • Graduate of University of Detroit, B.A.

**Community Service:**

*Board Member and Past President, Community Transportation Association of America; Board Member and Chair, Coordinated Transportation Solutions; Board Member, University of Rochester Medicine Home Care*

**LAURIE OLTRAMARI***Genesee County, Appointed in 2022*

Sr. Library Clerk for Genesee Community College (GCC) • Former Executive and Assistant Director, Batavia Business Improvement District (BID) • Graduate of SUNY Geneseo • Graduate of University at Buffalo – Masters of Architecture with a Concentration in Urban Design • Graduate Assistant for Instituto Monteverde, Costa Rica

**Community Service:**

*Former President, Genesee County COVID-19 Vaccination Clinic; Landmark Society of Genesee County*

**TERRENCE RICE, PE***Monroe County, Appointed in 2021*

Sr. Managing Engineer for Barton & Loguidice • Monroe County Director of Transportation (retired) • Graduate of Clarkson University

**Community Service:**

*Fellow – Institute of Transportation Engineers (ITE); Member, American Public Works Association; Member and Committee Chair, New York State Highway Superintendents Association; Member, Legends Golf & Country Club Golf Committee; Member, St. John of Rochester Buildings & Grounds Committee; Past President, Treasurer, and Legislative Committee Chair, New York State County Highway Superintendents Association; Past Chair, District 1 ITE; Past Chair, St. John of Rochester Parish Council*

**JUDITH AHLFELD SEIL***Monroe County, Appointed in 2021*

First Vice President, Five Star Bank, Credit Manager • Executive Director, Monroe County Planning and Development (retired) • Graduate of Leadership Rochester • Graduate of Nazareth College

**Community Service:**

*Dress for Success; Former Board Member of YWCA, Ronald McDonald House, Visit Rochester, and Greater Rochester Enterprise*

**EDWARD W. WHITE***Seneca County, Appointed in 2006*

Court Attorney, New York State Supreme Court Seventh Judicial District • Graduate of the University of Toledo

**Community Service:**

*Former Junius Town Justice; Former Member, Court Facilities Capital Review Board*

**BRIAN H. YOUNG, BOARD VICE-CHAIR***Ontario County, Appointed in 2021*

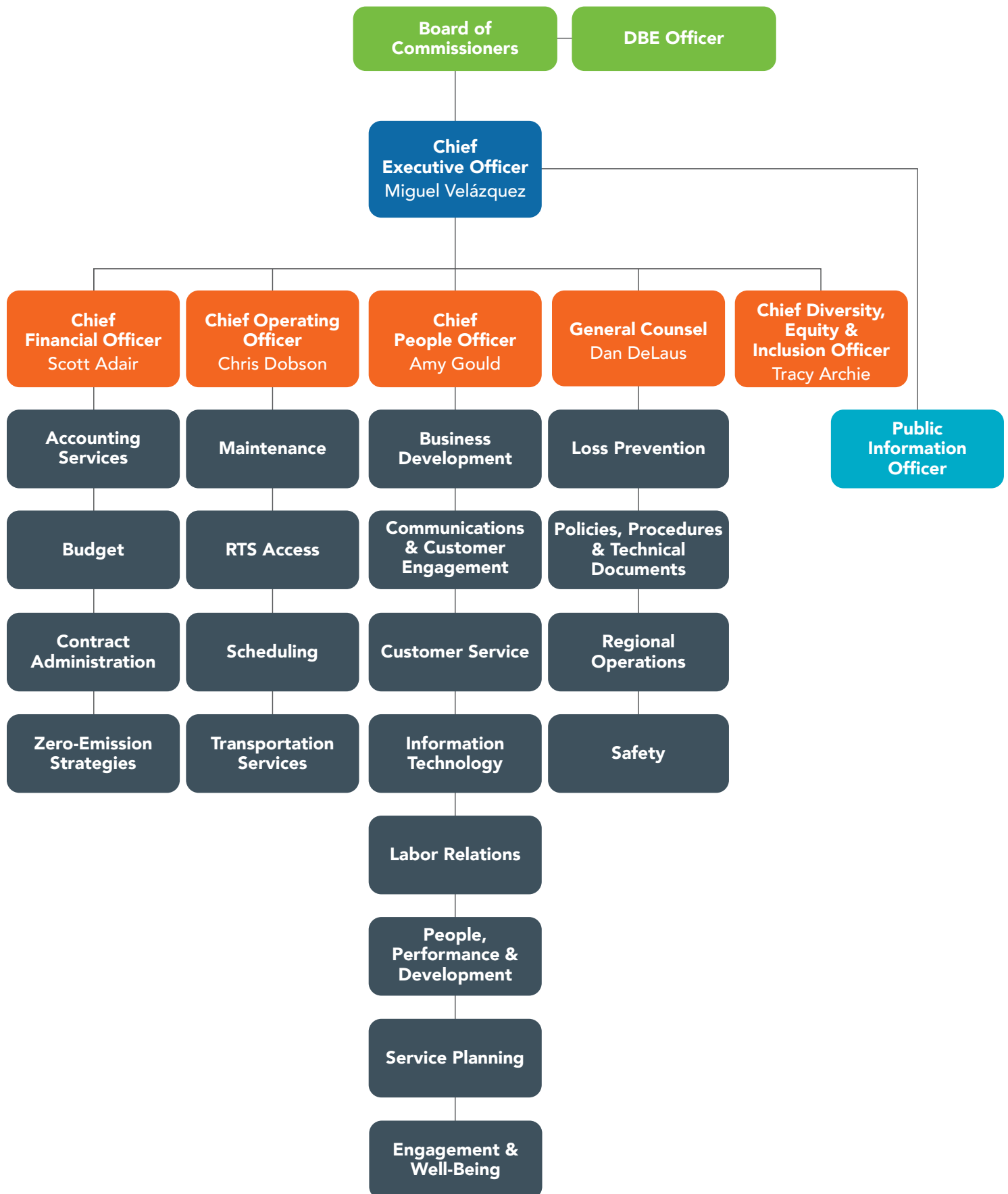
B. Young Enterprises, Owner • Deputy County Administrator (retired), Ontario County • Former Director of Workforce Development, Ontario County • Graduate of St. John Fisher College

**Community Service:**

*Board Member, Ontario County Traffic Safety; Former Member, Sonnenberg Gardens and Mansion Board of Trustees; Former Member and Chairman, Board of Directors, Finger Lakes Addictions Counseling & Referral Agency (FLACRA); Former Co-Chair, Finger Lakes Community College Campus Community Coalition Business*



# ORGANIZATIONAL STRUCTURE







An Update From Bill Carpenter

# The CEO Connection

Thursday, November 3, 2022

To the RTS Team,

At today's meeting of the RGRTA Board of Commissioners, I announced that I will retire as CEO of Regional Transit Service (RTS) by the end of June 2023. Immediately following my announcement, the Board passed a resolution authorizing the search for the next CEO of RTS. As part of the resolution, the Board made the decision to begin the search process by prioritizing an internal search. At the end of that process, the Board will either appoint a new candidate as CEO or expand the search to include external candidates.

Until they conclude their search and name a new CEO, we will continue operating under the executive team structure I announced in January when Miguel Velazquez was promoted to Deputy CEO. We will be sure to keep you informed throughout the process.

In the meantime, please know that it has been a privilege to serve you for the past 12 years, including 11 years as your Chief Executive Officer. You are the most dedicated and hardest-working group of public servants I have ever worked with. We did a lot of good work together. We built new facilities for RTS Monroe and Orleans, and are in the design process for RTS Access, Genesee, Seneca, Wayne, and Wyoming. We built and opened the RTS Transit Center. We redesigned our routes and services throughout the entire service area. We implemented new mobility options like RTS On Demand. We have become industry leaders through our zero-emission efforts. We have won numerous local, state, and national awards including the ETHIE Award for our ethical approach to employee culture. And we increased diversity among our supervisors and managers, as well as the Leadership and Executive Management Teams, with more work to be done. No matter what project or obstacle we faced, you showed what public service truly looks like by living the RTS Way and bringing to life our values. For that I will always be grateful.

While it is too soon to say goodbye, I will do my best to thank each of you in person in the coming months. If for some reason I am unable to achieve that goal, please know that I appreciate you, I respect you, and I thank you! I am grateful for everything you have done for me personally and professionally, and for everything you continue to do for our community.

With admiration and appreciation,

Bill Carpenter  
Chief Executive Officer



myRTS.com

December 15, 2022

To the RTS team,

It is my privilege to write on behalf of the Rochester Genesee Regional Transportation Authority (RGRTA) Board of Commissioners to inform you that at a special meeting earlier today, we voted to appoint Deputy CEO Miguel Velázquez as the next CEO of RTS starting January 1, 2023.

As many of you know, Miguel is a long-time member of the RTS team. He started here in 1999 as a member of the Information Technology team and worked his way up to Chief Information Officer, Chief Operating Officer, and Deputy CEO before being named as CEO. During his 23 years, Miguel has successfully overseen significant, innovative projects such as the transformation of the Authority's information systems, the construction and opening of the award-winning RTS Transit Center, and the design, planning and implementation of Reimagine RTS, the transit system redesign.

Miguel's experience, knowledge, and passion for RTS and our industry make him the perfect person to lead the organization into the future. The Board and I congratulate Miguel on this well-earned appointment and look forward to continuing the great work we are doing together.

If you have any questions about the Board's decision or the process we went through to reach this decision please see your supervisor.

Sincerely,

A handwritten signature in black ink that reads "Don Jeffries". The signature is written in a cursive, flowing style.

Don Jeffries  
Chairman  
RGRTA Board of Commissioners

#### Commissioners

##### Monroe County

Donald Jeffries  
*Chairman*

Terrence Rice  
Judith Ahlfeld Seil

##### City of Rochester

William J. Ansbrow  
Jerdine Johnson  
*Secretary*

William P. McDonald

##### Genesee County

Laurie Oltramari

##### Livingston County

Susanne Carlock

##### Ontario County

Brian H. Young  
*Vice Chairman*

##### Orleans County

James Bensley

##### Seneca County

Edward W. White

##### Wayne County

Michael P. Jankowski

##### Wyoming County

Richard Kosmerl  
*Treasurer*

##### ATU Local 282

Jacques Chapman

##### Non-Voting Member

Heather Bird

## EXHIBITS

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# Exhibit 02: Certifications and Assurances

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## Certifications and Assurances

Fiscal Year 2023

# **FEDERAL FISCAL YEAR 2023 CERTIFICATIONS AND ASSURANCES FOR FTA ASSISTANCE PROGRAMS**

(Signature pages alternate to providing Certifications and Assurances in TrAMS.)

Name of Applicant: Rochester Genesee Regional Transportation Authority

The Applicant certifies to the applicable provisions of all categories: *(check here)* \_\_\_\_\_.

Or,

The Applicant certifies to the applicable provisions of the categories it has selected:

Category	Certification
01 Certifications and Assurances Required of Every Applicant	<u>X</u>
02 Public Transportation Agency Safety Plans	<u>X</u>
03 Tax Liability and Felony Convictions	<u>X</u>
04 Lobbying	<u>X</u>
05 Private Sector Protections	<u>X</u>
06 Transit Asset Management Plan	<u>X</u>
07 Rolling Stock Buy America Reviews and Bus Testing	<u>X</u>
08 Urbanized Area Formula Grants Program	<u>X</u>
09 Formula Grants for Rural Areas	<u>X</u>
10 Fixed Guideway Capital Investment Grants and the Expedited Project Delivery for Capital Investment Grants Pilot Program	_____
11 Grants for Buses and Bus Facilities and Low or No Emission Vehicle Deployment Grant Programs	<u>X</u>

## Certifications and Assurances

Fiscal Year 2023

12 Enhanced Mobility of Seniors and Individuals with Disabilities Programs

X

13 State of Good Repair Grants

X

14 Infrastructure Finance Programs

X

15 Alcohol and Controlled Substances Testing

X

16 Rail Safety Training and Oversight

17 Demand Responsive Service

X

18 Interest and Financing Costs

X

19 Cybersecurity Certification for Rail Rolling Stock and Operations

20 Tribal Transit Programs

21 Emergency Relief Program

X**CERTIFICATIONS AND ASSURANCES SIGNATURE PAGE****AFFIRMATION OF APPLICANT**Name of the Applicant: Rochester Genesee Regional Transportation Authority

BY SIGNING BELOW, on behalf of the Applicant, I declare that it has duly authorized me to make these Certifications and Assurances and bind its compliance. Thus, it agrees to comply with all federal laws, regulations, and requirements, follow applicable federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its Authorized Representative makes to the Federal Transit Administration (FTA) in the federal fiscal year, irrespective of whether the individual that acted on his or her Applicant's behalf continues to represent it.

The Certifications and Assurances the Applicant selects apply to each Award for which it now seeks, or may later seek federal assistance to be awarded by FTA during the federal fiscal year.

The Applicant affirms the truthfulness and accuracy of the Certifications and Assurances it has selected in the statements submitted with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. § 3801 *et seq.*, and implementing U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR part 31, apply to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. § 1001 apply to any certification, assurance, or submission made in connection with a federal public transportation program authorized by 49 U.S.C. chapter 53 or any other statute



## Certifications and Assurances

Fiscal Year 2023

In signing this document, I declare under penalties of perjury that the foregoing Certifications and Assurances, and any other statements made by me on behalf of the Applicant are true and accurate.

Signature

Date:

Name Miguel Velazquez

Authorized Representative of Applicant

## AFFIRMATION OF APPLICANT'S ATTORNEY

For (Name of Applicant): Rochester Genesee Regional Transportation Authority

As the undersigned Attorney for the above-named Applicant, I hereby affirm to the Applicant that it has authority under state, local, or tribal government law, as applicable, to make and comply with the Certifications and Assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the Certifications and Assurances have been legally made and constitute legal and binding obligations on it.

I further affirm that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these Certifications and Assurances, or of the performance of its FTA assisted Award.

Signature

Date:

Name Dan DeLaus

Attorney for Applicant

*Each Applicant for federal assistance to be awarded by FTA must provide an Affirmation of Applicant's Attorney pertaining to the Applicant's legal capacity. The Applicant may enter its electronic signature in lieu of the Attorney's signature within TrAMS, provided the Applicant has on file and uploaded to TrAMS this hard-copy Affirmation, signed by the attorney and dated this federal fiscal year.*

## Certifications and Assurances

Fiscal Year 2022

# FEDERAL FISCAL YEAR 2022 CERTIFICATIONS AND ASSURANCES FOR FTA ASSISTANCE PROGRAMS

(Signature pages alternate to providing Certifications and Assurances in TrAMS.)

Name of Applicant Rochester Genesee Regional Transportation Authority

The Applicant certifies to the applicable provisions of all categories' (*check here*)           .

*Or,*

The Applicant certifies to the applicable provisions of the categories it has selected:

Category	Certification
01 Certifications and Assurances Required of Every Applicant	<u>X</u>
02 Public Transportation Agency Safety Plans	<u>X</u>
03 Tax Liability and Felony Convictions	<u>X</u>
04 Lobbying	<u>X</u>
05 Private Sector Protections	<u>X</u>
06 Transit Asset Management Plan	<u>X</u>
07 Rolling Stock Buy America Reviews and Bus Testing	<u>X</u>
08 Urbanized Area Formula Grants Program	<u>X</u>
09 Formula Grants for Rural Areas	<u>X</u>
10 Fixed Guideway Capital Investment Grants and the Expedited Project Delivery for Capital Investment Grants Pilot Program	<u>          </u>
11 Grants for Buses and Bus Facilities and Low or No Emission Vehicle Deployment Grant Programs	<u>X</u>

## Certifications and Assurances

Fiscal Year 2022

12 Enhanced Mobility of Seniors and Individuals with Disabilities Programs

X

13 State of Good Repair Grants

X

14 Infrastructure Finance Programs

15 Alcohol and Controlled Substances Testing

X

16 Rail Safety Training and Oversight

17 Demand Responsive Service

X

18 Interest and Financing Costs

X

19 Cybersecurity Certification for Rail Rolling Stock and Operations

20 Tribal Transit Programs

21 Emergency Relief Program

X

**CERTIFICATIONS AND ASSURANCES SIGNATURE PAGE****AFFIRMATION OF APPLICANT**

Name of the Applicant: Rochester Genesee Regional Transportation Authority

BY SIGNING BELOW, on behalf of the Applicant, I declare that it has duly authorized me to make these Certifications and Assurances and bind its compliance. Thus, it agrees to comply with all federal laws, regulations, and requirements, follow applicable federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its Authorized Representative makes to the Federal Transit Administration (FTA) in the federal fiscal year, irrespective of whether the individual that acted on his or her Applicant's behalf continues to represent it.

The Certifications and Assurances the Applicant selects apply to each Award for which it now seeks, or may later seek federal assistance to be awarded by FTA during the federal fiscal year.

The Applicant affirms the truthfulness and accuracy of the Certifications and Assurances it has selected in the statements submitted with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. § 3801 *et seq.*, and implementing U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR part 31, apply to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. § 1001 apply to any certification, assurance, or submission made in connection with a federal public transportation program authorized by 49 U.S.C. chapter 53 or any other statute

## Certifications and Assurances

Fiscal Year 2022

In signing this document, I declare under penalties of perjury that the foregoing Certifications and Assurances, and any other statements made by me on behalf of the Applicant are true and accurate.

Signature  Date: 2/7/22  
 Name William C. Carpenter Authorized Representative of Applicant

## AFFIRMATION OF APPLICANT'S ATTORNEY

For (Name of Applicant): Rochester Genesee Regional Transportation Authority

As the undersigned Attorney for the above-named Applicant, I hereby affirm to the Applicant that it has authority under state, local, or tribal government law, as applicable, to make and comply with the Certifications and Assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the Certifications and Assurances have been legally made and constitute legal and binding obligations on it.

I further affirm that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these Certifications and Assurances, or of the performance of its FTA assisted Award.

Signature  Date: 2/7/22  
 Name Dan DeLaus Attorney for Applicant

*Each Applicant for federal assistance to be awarded by FTA must provide an Affirmation of Applicant's Attorney pertaining to the Applicant's legal capacity. The Applicant may enter its electronic signature in lieu of the Attorney's signature within TrAMS provided the Applicant has on file and uploaded to TrAMS this hard-copy Affirmation, signed by the attorney and dated this federal fiscal year.*

Certifications and Assurances

Fiscal Year 2021

### FEDERAL FISCAL YEAR 2021 CERTIFICATIONS AND ASSURANCES FOR FTA ASSISTANCE PROGRAMS

(Signature pages alternate to providing Certifications and Assurances in TrAMS.)

Name of Applicant: Rochester Genesee Regional Transportation Authority

The Applicant certifies to the applicable provisions of categories 01–21. \_\_\_\_\_

*Or,*

The Applicant certifies to the applicable provisions of the categories it has selected:

Category	Certification
01 Certifications and Assurances Required of Every Applicant	<u>X</u>
02 Public Transportation Agency Safety Plans	<u>X</u>
03 Tax Liability and Felony Convictions	<u>X</u>
04 Lobbying	<u>X</u>
05 Private Sector Protections	<u>X</u>
06 Transit Asset Management Plan	<u>X</u>
07 Rolling Stock Buy America Reviews and Bus Testing	<u>X</u>
08 Urbanized Area Formula Grants Program	<u>X</u>
09 Formula Grants for Rural Areas	<u>X</u>
10 Fixed Guideway Capital Investment Grants and the Expedited Project Delivery for Capital Investment Grants Pilot Program	_____
11 Grants for Buses and Bus Facilities and Low or No Emission Vehicle Deployment Grant Programs	<u>X</u>

## Certifications and Assurances

Fiscal Year 2021

12	Enhanced Mobility of Seniors and Individuals with Disabilities Programs	<u>                    </u>
		<u>          X          </u>
13	State of Good Repair Grants	<u>                    </u>
		<u>          X          </u>
14	Infrastructure Finance Programs	<u>                    </u>
15	Alcohol and Controlled Substances Testing	<u>                    </u>
		<u>          X          </u>
16	Rail Safety Training and Oversight	<u>                    </u>
17	Demand Responsive Service	<u>                    </u>
		<u>          X          </u>
18	Interest and Financing Costs	<u>                    </u>
		<u>          X          </u>
19	Construction Hiring Preferences	<u>                    </u>
		<u>          X          </u>
20	Cybersecurity Certification for Rail Rolling Stock and Operations	<u>                    </u>
21	Tribal Transit Programs	<u>                    </u>

**FEDERAL FISCAL YEAR 2021 FTA CERTIFICATIONS AND ASSURANCES SIGNATURE****PAGE**

(Required of all Applicants for federal assistance to be awarded by FTA in FY 2021)

**AFFIRMATION OF APPLICANT**Name of the Applicant: Rochester Genesee Regional Transportation Authority

BY SIGNING BELOW, on behalf of the Applicant, I declare that it has duly authorized me to make these Certifications and Assurances and bind its compliance. Thus, it agrees to comply with all federal laws, regulations, and requirements, follow applicable federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its Authorized Representative makes to the Federal Transit Administration (FTA) in federal fiscal year 2021, irrespective of whether the individual that acted on his or her Applicant's behalf continues to represent it.

FTA intends that the Certifications and Assurances the Applicant selects on the other side of this document should apply to each Award for which it now seeks, or may later seek federal assistance to be awarded during federal fiscal year 2021.

The Applicant affirms the truthfulness and accuracy of the Certifications and Assurances it has selected in the statements submitted with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. § 3801 *et seq.*, and implementing U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR part 31, apply to any certification, assurance or submission made to



## Certifications and Assurances

Fiscal Year 2021

FTA. The criminal provisions of 18 U.S.C. § 1001 apply to any certification, assurance, or submission made in connection with a federal public transportation program authorized by 49 U.S.C. chapter 53 or any other statute

In signing this document, I declare under penalties of perjury that the foregoing Certifications and Assurances, and any other statements made by me on behalf of the Applicant are true and accurate.

Signature \_\_\_\_\_

Date: 2/3/21Name William C. Carpenter

Authorized Representative of Applicant

## AFFIRMATION OF APPLICANT'S ATTORNEY

For (Name of Applicant): Rochester Genesee Regional Transportation Authority

As the undersigned Attorney for the above-named Applicant, I hereby affirm to the Applicant that it has authority under state, local, or tribal government law, as applicable, to make and comply with the Certifications and Assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the Certifications and Assurances have been legally made and constitute legal and binding obligations on it.

I further affirm that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these Certifications and Assurances, or of the performance of its FTA assisted Award.

Signature \_\_\_\_\_

Date: 2/3/21Name Dan DeLaus

Attorney for Applicant

*Each Applicant for federal assistance to be awarded by FTA must provide an Affirmation of Applicant's Attorney pertaining to the Applicant's legal capacity. The Applicant may enter its electronic signature in lieu of the Attorney's signature within TrAMS, provided the Applicant has on file and uploaded to TrAMS this hard-copy Affirmation, signed by the attorney and dated this federal fiscal year.*

## EXHIBITS

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# Exhibit 03: Program Submission and Approval

## Exhibit 03 Program Submission and Approval Table of Contents

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**QUARTERLY BOARD MEETING OF RGRTA AND ITS SUBSIDIARIES**  
**THURSDAY, MAY 4, 2023 ♦ 12:00 PM – 2:00 PM**  
**1372 EAST MAIN STREET – BOARD ROOM**  
**ROCHESTER, NY 14609**

**A. ROLL CALL AND DETERMINATION OF QUORUM****DONALD JEFFRIES, CHAIRMAN**

1. Pledge of Allegiance
2. Adoption of the Agenda

**B. APPROVE MINUTES AND ACCEPTANCE OF REPORTS****DONALD JEFFRIES, CHAIRMAN**

1. RGRTA Finance/Investment Committee Meeting of April 6, 2023
2. RGRTA Regular Board Meeting Minutes of April 6, 2023

**C. CHIEF EXECUTIVE REPORT****MIGUEL VELÁZQUEZ, CEO**

1. TOPS Report
  - a. Financial Sustainability
  - b. Customer Satisfaction
  - c. Service Quality
  - d. Employee Engagement
2. Comprehensive Plan Initiatives Update
3. RTS Way – Employee Recognition
4. Other Updates

**D. PROPOSED RESOLUTION**

- **RGRTA 16-2023**, Resolution Authorizing the Award of a Contract for the Construction of the RTS Seneca Bus Facility, **David Belaskas, Director of Engineering & Facilities Management**
- **RGRTA 17-2023**, Resolution to Adopt and Approve the 2023-2026 Title VI Program Plan, **Daniel DeLaus, General Counsel**

**E. CONSENT RESOLUTIONS**

- **RGRTA 18-2023**, Resolution Authorizing the Award of a Contract for Special Inspection Services for the Hylan Drive Connection Hub, the RTS Wyoming Bus Facility, and the RTS Seneca Bus Facility, **David Belaskas, Director of Engineering & Facilities Management**
- **RGRTA 19-2023**, Resolution Authorizing the Disposal of Assets, **Scott Adair, Chief Financial Officer**
- **RGRTA 20-2023**, Resolution Authorizing a Collective Bargaining Agreement between RTS Access and the Teamsters, Local 118, **Daniel DeLaus, General Counsel**
- **GTCS 1-2023**, Resolution Authorizing GTCS, Inc. to Execute a Contract for Professional Services to be rendered to the Genesee Transportation Council for the Ontario County Freight Rail Corridor Development: Area 2, **James Stack, Executive Director GTCS**

**F. CALENDAR****G. ADJOURNMENT****DONALD JEFFRIES, CHAIRMAN**



**ROCHESTER  
GENESEE REGIONAL  
TRANSPORTATION  
AUTHORITY**

## BOARD OF COMMISSIONERS AGENDA ITEM COVER SHEET

<b>Board Meeting Date:</b>	May 4, 2023
<b>Presenter:</b>	Daniel DeLaus
<b>Subject:</b>	Resolution to Adopt and Approve the 2023-2026 Title VI Program Plan
<b>Background:</b>	<p>Title VI of the Civil Rights Act of 1964 is a Federal law that prohibits recipients of Federal funding from discriminating against people based on their race, color, or national origin. As recipients of Federal funding, the Authority is bound to follow the mandates of Title VI.</p> <p>In order to ensure compliance with Title VI, the Federal Transit Administration (FTA) requires recipients to submit, for FTA approval, a Title VI Program Plan (the Plan) at a minimum every three years. The Plan delineates how a recipient intends to operate in compliance with Title VI during that period of time.</p> <p>The Plan includes a Public Participation process, a Compliant process, and a Language Assistance process. In addition, equity analyses are required for Facility Site Selection and Major Service Change along with Minority route comparison reporting and notification on rights under Title VI.</p> <p>The Plan identified the areas of Facility Site Selection, Minority Route Comparison and Major Service Change that additional mitigation efforts are necessary. These efforts to be undertaken in the future include monitoring of bus operator staffing, public participation of site locations, and notifications of proposed service changes. The plan's sections on Language Assistance and Complaint Components will continue with no change from the prior plan.</p>
<b>Financial Impact:</b>	The Authority's 2023-2024 Operating Budget provides funding for the Title VI Program Plan. Future Authority Operating Budgets will provide funding for the Title VI Program Plan.
<b>Recommendation:</b>	That the Board of Commissioners approve the 2023-2026 Title VI Program Plan in the form submitted that includes mitigation efforts in Facility Site Selection, Minority Route Comparison and Major Service Changes.

Our Promise: RTS makes it easy to enjoy your journey.





**Resolution: RGRTA 17-2023****RESOLUTION TO ADOPT AND APPROVE THE 2023-2026 TITLE VI PROGRAM PLAN**

WHEREAS, the Rochester Genesee Regional Transportation Authority (the "Authority") is a recipient of Federal funding and thus required to abide by Title VI of the Civil Rights Law of 1964 and the regulations which implement that statute; and

WHEREAS, the Federal Transit Administration requires recipients to submit a Title VI Program Plan every three years; and

WHEREAS, the Authority has prepared a proposed 2023-2026 Title VI Program Plan; and

WHEREAS, the Authority has undertaken equity analyses for the determination of Facility Site Selection for possible facilities and Major Service Change since the submission of the previous Plan and has proposed mitigation to address the disparate impact of these areas;

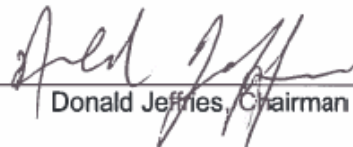
NOW, THEREFORE, BE IT RESOLVED, the Authority's proposed 2023-2026 Title VI Program Plan is hereby adopted and approved; and

BE IT FURTHER RESOLVED, that the Facility Site Equity Analyses, Major Service Change Equity Analyses, Service Monitoring Analyses; along with the proposed steps for increased public participation and mitigations address the disparate impact on minority populations; and

BE IT FURTHER RESOLVED that the Chief Executive Officer or his designee is hereby authorized, empowered and directed, for and on behalf of the Authority, to perform any and all actions and to execute any and all documents on behalf of the Authority as they may deem necessary, appropriate or advisable to carry out the intent and purposes of the foregoing resolutions.

**CERTIFICATION**

The undersigned hereby certifies that the above is an excerpt from the Minutes of a Quarterly Meeting of the Rochester-Genesee Regional Transportation Authority, which was held on May 04, 2023 and that the Resolution is still in full force and effect.

  
Donald Jeffries, Chairman

Date: May 04, 2023  
Rochester, New York



# **Title VI Program Plan 2023-2026**

**RGRTA 17-2023**

*Presented by Daniel DeLaus, General Counsel*

**RGRTA**

## Agenda

- Refresher on Title VI
- Activities Reported and Planned
  - Public Participation process
  - Language Assistance process
  - Complaint process
  - Notice to Public on Rights Under Title VI
  - Facility Site Selection equity analyses
  - Minority Route Comparison report
  - Major Service Change equity analyses
- Recommendation

## Refresher on Title VI

Title VI of the Civil Rights Act of 1964 is a law where

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

RGRTA

## Activities

Component	Reported 2020-2023 Activities	Planned 2023-2026 Activities
Public Participation	Summary of outreach for the May 2021 launch of Reimagine RTS. Summary of Open Houses throughout 2021 – 2023 to educate and seek comment on service changes, new technology, and job recruitment.	Use Open Houses and Public Information sessions to communicate proposed service changes and solicit comment; and, notify affected neighborhoods about facility projects, obtain comments, and form advisory bodies to engage during the planning process.
Language Assistance	Spanish-speaking LEP populations are most likely to use RGRTA services. Our investment in telephonic interpreting services increased.	Continue to track LEP populations and provide telephonic interpreting, translation of vital documents, and in-person interpreting.
Complaints	We followed our procedures and investigated two Title VI complaints. In both cases, no discriminatory practices or behaviors were found.	Continue to adhere to our Complaint and Investigation practices. Continue to educate staff about the process to follow when a customer alleges discrimination.
Notice to Public	Updated language in our Title VI notices on the website, in all location flyers, the digital monitors at the RTS Transit Center, and rail cards onboard RTS Connect buses.	Update decals on all existing and new vehicles.

## Activities

Component	Reported 2020-2023 Activities	Planned 2023-2026 Activities
Facility Site Selection	Report of the equity analyses performed for the possible sites for the RTS Access, Zero-Emission Depot, RTS Genesee, RTS Seneca, and RTS Wayne facilities.	Engage in strong public participation to understand and mitigate disparate impacts for populations affected. Evaluate whether alternate viable locations exist. Determine whether there is legitimate justification for using a site with disparate impact.
Minority Route Comparison	No discriminatory patterns found. However, the bus operator shortage creates disparity for frequency on Routes 3, 4, 5, and 22.	Continue to track bus operator staffing monthly. Return affected routes to 15-minute frequency when staffing allows. Affected routes will be prioritized by customer demand.
Major Service Change	Report of the major service changes to the fixed route system since May 2021 as well as mitigations for those which trigger disparate impact and disproportionate burden.	Improve the alignment of proposed changes, equity analyses, public participation, Board notification, and implementation. Continue to track bus operator staffing monthly as the mitigation for route frequency depends on the available pool of bus operators.

## Recommendation

That the Board of Commissioners approve the 2023-2026 Title VI Program Plan in the form submitted that includes mitigation efforts in Facility Site Selection, Minority Route Comparison and Major Service Changes.





U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION II  
New Jersey  
New York

One Bowling Green  
Room 429  
New York, NY 10004-1415  
212-668-2170  
212-668-2136 (fax)

August 2, 2022

Mr. Donald Jeffries  
Chairman, Board of Directors  
Rochester Genesee Regional Transportation Authority (RGRTA)  
1372 East Main Street  
Rochester, NY 14609

**Re: Federal Transit Administration (FTA) Fiscal Year 2022 Triennial Review – Final Report**

Dear Mr. Jeffries:

I am pleased to provide you with a copy of this FTA report as required by 49 U.S.C. Chapter 53 and other Federal requirements. The enclosed final report documents the FTA's Triennial Review of the Rochester Genesee Regional Transportation Authority (RGRTA) of Rochester, New York. Although not an audit, the Triennial Review is the FTA's assessment of RGRTA's compliance with Federal requirements, determined by examining a sample of award management and program implementation practices. As such, the Triennial Review is not intended as, nor does it constitute, a comprehensive and final review of compliance with award requirements.

Due to the Coronavirus 2019 (COVID-19) Public Health Emergency, a virtual site visit was conducted for this Triennial Review. In addition, the review was expanded to address RGRTA's compliance with the administrative relief and flexibilities FTA granted and the requirements of the COVID-19 Relief funds received through the Coronavirus Aid, Relief, and Economic Security (CARES) Act, Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA) of 2021, and the American Rescue Plan (ARP) Act of 2021.

The Triennial Review focused on RGRTA's compliance in 23 areas. **No deficiencies were found with the FTA requirements in any of these areas.**

### **Regulations and Guidance**

As RGRTA moves forward with its transit program, the FTA would like to provide a look-ahead for future oversight activities related to new and/or updated requirements, below.

#### **Cybersecurity Certification for Rail Rolling Stock and Operations**

In FY2020, the National Defense Authorization Act for Fiscal Year 2020, Pub. L. 116-92, §7613 promulgated the addition of U.S.C. Section 5323(v). This new requirement instructs recipients that operate rail fixed guideway public transportation systems to certify to FTA that it established

Mr. Jeffries

Federal Transit Administration (FTA) Fiscal Year 2022 Triennial Review – Final Report

Page 2

a process to develop, maintain, and execute a written plan for identifying and reducing cybersecurity risks. Recipients are to use the approach described in the voluntary standards and best practices developed by the National Institute of Standards and Technology (NIST) and the Secretary of Homeland Security in consultation and coordination with various stakeholders. Recipients are to also identify hardware and software it determines should be tested and analyzed by a third party to mitigate cybersecurity risk

For the FY2022 review cycle, FTA is deploying a “soft launch” in determining, if and how, recipients are developing their plan for identifying and reducing cybersecurity risks. Recipients are to certify in TrAMS by correctly completing Category 20 of the Annual Certifications and Assurances to indicate their compliance with this requirement. For the FY2025 review cycle, this requirement will be reviewed for full compliance.

For additional information about the cybersecurity framework, visit the NIST’s website at: <https://www.nist.gov/cyberframework/framework>.

Thank you for your cooperation and assistance during this Triennial Review. If you need any technical assistance or have any questions, please do not hesitate to contact Ms. Veronica Pelt, FTA Program Manager at 212-668-2184 or [veronica.pelt@dot.gov](mailto:veronica.pelt@dot.gov).

Sincerely,

 Stephen Goodman  
Regional Administrator

Enclosure

cc: William Carpenter, RGRTA (via email); Eric Farr, RGRTA (via email); Cheryl Nieskes, RGRTA (via email); Scott Adair, RGRTA (via email); Darreyl Davis, FTA (via email); Rosie Luperena, FTA (via email); Veronica Pelt, FTA (via email); John Caruolo, CDI/DCI Joint Venture (via email); Kathleen Beck, CDI/DCI Joint Venture (via email)

# **FINAL REPORT**

## **FISCAL YEAR 2022 TRIENNIAL REVIEW** of

**Rochester Genesee Regional Transportation Authority  
(RGRTA)  
Rochester, New York  
ID: 1797**

*Performed for:*

**U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL TRANSIT ADMINISTRATION  
REGION 2**

*Prepared By:*

***CDI/DCI Joint Venture***

**Scoping Meeting: March 10, 2022  
Site Visit Date: June 7-15, 2022  
Draft Report Date: July 12, 2022  
Final Report Date: August 2, 2022**

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## I. Executive Summary

This report documents the Federal Transit Administration's (FTA) Triennial Review of the Rochester Genesee Regional Transportation Authority (RGRTA) of Rochester, New York. The FTA wants to ensure that awards are administered in accordance with the requirements of Federal public transportation law 49 U.S.C. Chapter 53. The review was performed by CDI/DCI Joint Venture. During the site visit, administrative and statutory requirements were discussed, and documents were reviewed.

Due to the Coronavirus 2019 (COVID-19) Public Health Emergency, a virtual site visit was conducted for this Triennial Review. In addition, the review was expanded to address RGRTA's compliance with the administrative relief and flexibilities FTA granted and the requirements of the COVID-19 Relief funds received through the Coronavirus Aid, Relief, and Economic Security (CARES) Act, Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA) of 2021, and the American Rescue Plan (ARP) Act of 2021. RGRTA was also requested to share if and/or how it suspended, deviated from, or significantly updated or altered its transit program due to the public health emergency.

The Triennial Review focused on RGRTA's compliance in 23 areas. Deficiencies related to the COVID-19 Relief funds have been clearly identified as part of the deficiency description in the respective review area.

No deficiencies were found with the FTA requirement in any of these areas.



state's overall policies and procedures. When applied to Federal procurements, those policies and procedures must still be compliant with all Federal requirements as applied to non-state recipients. The flexibility afforded by 2 CFR Part 200 should not be misconstrued as absolving a state from Federal requirements. For example, the FTA does not require each State DOT to have policies and procedures separate from the state education department.

Finding: During this Triennial Review of RGRTA, no deficiencies were found with the FTA requirements for Procurement.

## 10. Disadvantaged Business Enterprise (DBE)

Basic Requirement: Recipients must comply with 49 CFR Part 26 to ensure nondiscrimination in the award and administration of USDOT assisted contracts. Recipients also must create a level playing field on which DBEs can compete fairly for USDOT assisted contracts.

Finding: During this Triennial Review of RGRTA, no deficiencies were found with the USDOT requirements for DBE.

## 11. Title VI

Basic Requirement: The recipient must ensure that no person shall, on the grounds of race, color, or national origin, be excluded from participating in, or be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal financial assistance without regard to whether specific projects or services are federally funded. The recipient must ensure that all transit services and related benefits are distributed in an equitable manner.

Finding: During this Triennial Review of RGRTA, no deficiencies During this Triennial Review of RGRTA, no deficiencies were found with the FTA requirements for Title VI.

## 12. Americans with Disabilities Act (ADA) – General

Basic Requirement: Titles II and III of the Americans with Disabilities Act of 1990 provide that no entity shall discriminate against an individual with a disability in connection with the provision of transportation service. The law sets forth specific requirements for vehicle and facility accessibility and the provision of service, including complementary paratransit service.

Finding: During this Triennial Review of RGRTA, no deficiencies were found with the USDOT requirements for ADA – General.

## 13. ADA – Complementary Paratransit

Basic Requirement: Under 49 CFR 37.121(a), each public entity operating a fixed-route system shall provide paratransit or other special service to individuals with disabilities that is comparable to the level of service provided to individuals without disabilities who use the fixed-route system.

## V. Summary of Findings

Review Area	Finding	Deficiency Code(s)	Corrective Action(s)	Response Due Date(s)	Date Closed
1. Legal	ND				
2. Financial Management and Capacity	ND				
3. Technical Capacity – Award Management	ND				
4. Technical Capacity – Program Management and Subrecipient Oversight	NA				
5. Technical Capacity – Project Management	ND				
6. Transit Asset Management	ND				
7. Satisfactory Continuing Control	ND				
8. Maintenance	ND				
9. Procurement	ND				
10. Disadvantaged Business Enterprise	ND				
11. Title VI	ND				
12. Americans with Disabilities Act (ADA) – General	ND				
13. ADA – Complementary Paratransit	ND				
14. Equal Employment Opportunity	ND				
15. School Bus	ND				
16. Charter Bus	ND				
17. Drug-Free Workplace	ND				
18. Drug and Alcohol Program	ND				
19. Section 5307 Program Requirements	ND				

## VI. Attendees

Name	Title	Phone Number	E-mail Address
<b><i>RGRTA</i></b>			
Bill Carpenter	Chief Executive Officer	585-654-0607	bcarpenter@myrts.com
Miguel Velazquez	Deputy Chief Executive Officer	585-654-0257	mvalazquez@myrts.com
Scott Adair	Chief Financial Officer	585-654-0230	sadair@myrts.com
Dan DeLaus	General Counsel	585-654-0771	ddelaus@myrts.com
Cheryl Nieskes	Grants Administrator	585-654-0290	cnieskes@myrts.com
Miranda Heyward	Director of Accounting Services	585-654-0247	mheyward@myrts.com
Eric Farr	Manager of Capital Planning	585-654-0234	efarr@myrts.com
Brian Fredricks	Senior Accountant	585-654-0280	bfredricks@myrts.com
Justin Feasel	Manager of Purchasing & Project Management	585-654-0263	jfeasel@myrts.com
Dawn Sywulski	Manager of Contracts Administration	585-654-0603	dsywulski@myrts.com
Sara Molyneux	Policies, Procedures, Technical Documents Manager	585-654-0241	smolyneux@myrts.com
William Korth	Vice President of Zero-Emission Strategies	585-654-0689	wkorth@myrts.com
Dave Belaskas	Director of Engineering	585-654-0658	dbelaskas@myrts.com
Krystle Hall	Director of People Performance & Development	585-654-0708	khall@myrts.com
James Mott	Director of Paratransit Services	585-654-0744	jmott@myrts.com
Amy Gould	Chief People Officer	585-654-0684	agould@myrts.com
Lea Goodness	Director of Scheduling	585-654-0704	lgoodness@myrts.com
Bonnie Maguire	Director of Business Development	585-654-0659	bmaguire@myrts.com
Dave Masten	Manager of Loss Prevention	585-654-0261	dmasten@myrts.com
Jason Palvino	System Safety Manager	585-654-0662	jpalvino@myrts.com
Chris Dobson	Vice President of Transportation Services	585-654-0627	cdobson@myrts.com
<b><i>FTA</i></b>			
Stephen Goodman	Regional Administrator	212-668-2170	stephen.goodman@dot.gov
Michael Culotta	Deputy Regional Administrator	212-668-2170	michael.culotta@dot.gov

Veronica Pelt	Program Manager	212-668-2184	veronica.pelt@dot.gov
Lynn Bailey	Regional Civil Rights Officer	215-656-7121	lynn.bailey@dot.gov
Darreyl Davis	Director, Office of Operations & Program Management	212-668-2186	darreyl.davis@dot.gov
Rosie Luperena	Program Manager	212-668-2185	r.luperena@dot.gov
Jonathan Howard	Program Manager	212-824-2421	j.howard@dot.gov
Sheldon Soleyn	General Engineer	212-668-1771	sheldon.soleyn@dot.gov
<b><i>CDI/DCI Joint Venture</i></b>			
John R. Caruolo	Reviewer	610-716-2673	jcaruolo@aol.com
Kathleen Beck	Technical Program Manager	540-429-0585	beck_km@outlook.com



U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION 2  
New York & New Jersey

One Bowling Green, Room 428  
New York, NY 10004

January 8, 2021

Dan DeLaus  
Rochester-Genesee Regional Transportation Authority, Recipient ID: 1797  
1372 East Main St.  
Rochester, NY 14609

Re: Triennial Title VI Program Update

Dear Dan DeLaus,

The Federal Transit Administration (FTA) has received and reviewed Rochester-Genesee Regional Transportation Authority's initial Title VI program submitted on 9/30/2020. This Title VI program will be effective August 1, 2020 - July 31, 2023. The Department of Transportation (DOT) requires recipients of DOT funds to demonstrate compliance with Title VI of the Civil Rights Act of 1964 through regular compliance reports. The Federal Transit Administration's (FTA) Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients" sets forth the information that should be included in these updates, and requires they be submitted as Title VI programs every three years.

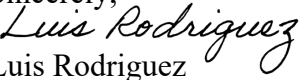
FTA's review of your Title VI program considered all elements required by the Department of Transportation regulations found at 49 CFR Part 21, as outlined in Circular 4702.1B. The Review Assessment attached to this letter identifies the specific areas reviewed, any concerns, and relevant reviewer comments. To assure you are implementing Title VI program requirements in accordance with the regulations, you must promptly address and correct any concerns identified with a "no" in the Review Assessment. Your program status is now *Concur*. Your next triennial Title VI program submission is due to FTA on June 1, 2023. Please retain documentation as needed to demonstrate the corrections noted have been addressed. FTA typically verifies corrections have been made and implemented at the next oversight opportunity, but can request this information at any time.

Your Title VI program demonstrates your agency has the procedures and resources to ensure public transportation services are provided in a nondiscriminatory manner, as required by Title VI of the Civil Rights Act of 1964. FTA's review and concurrence on a Title VI program does not relieve recipients from the requirements and responsibilities outlined in Circular 4702.1B or of the DOT Title VI regulation at 49 CFR Part 21. You must properly implement your program to ensure nondiscriminatory service, including full and fair participation in public transportation decision-making, and meaningful access to transit-related programs and activities by persons with limited English proficiency. If you use contractors or have subrecipients, you must monitor their compliance with Title VI. You can find these monitoring responsibilities in Chapter 2,

Section 6 (Contractors) and Chapter 3, Section 12 (Subrecipients) in the FTA Title VI Circular. As a basic requirement for Title VI compliance, you must develop a language assistance plan (LAP). Your LAP must include a Four Factor Analysis—you can find information on this analysis in Chapter 3, Section 6 of the FTA Title VI Circular. If you believe that your agency only serves an English-speaking population, you still must complete a Four Factor analysis to demonstrate this.

Prior to implementing any major service changes or any fare change, transit agencies operating more than 50 vehicles in large urbanized areas must complete an equity analysis, and submit it for board review and approval. You can find more information on Service and Fare Equity (SAFE) Analyses in Chapter 4, Section 7 of the FTA Title VI Circular. Large transit agencies must also collect and report demographic data, including data gathered through rider surveys, and monitor transit service relative to system-wide service standards and service policies. If you need technical assistance with your SAFE Analysis, please contact your Regional Civil Rights Officer.

FTA is committed to providing technical assistance to help correct your Title VI program and to implement your program consistent with the regulations and guidance. In order to preserve paper, we are issuing this letter electronically via email and it is attached to your profile in TrAMS. Please do not hesitate to contact me directly at 212-668-2324 or at [l.a.rodriguez@dot.gov](mailto:l.a.rodriguez@dot.gov) if you have any questions.

Sincerely,  
  
Luis Rodriguez  
Civil Rights Officer, Region 2

cc: Stephen Goodman, FTA Region 2, Regional Administrator  
Monica McCallum, FTA Civil Rights, Director of Regional Operations



## **Title VI Program Review Assessment:**

Items below identified as “YES” are included in the Title VI program review, and no changes are needed. Items identified as “NO” were not included or were insufficient and must be corrected. Carefully address all insufficient items, as indicated in this review letter, to ensure you are implementing your Title VI program in accordance with the regulations.

### **Chapter 3: GENERAL REQUIREMENTS AND GUIDELINES**

Does the program submission include appropriate documentation demonstrating that the transit board of directors has approved the Title VI program? *Yes*

#### **Public Notice**

Does the submission include a copy of the public notice informing the public of the protections against discrimination afforded to them under Title VI? *Yes*

Is there a list of public locations where the notice is posted? *Yes*

Did you verify the notice is posted on the agency’s website and in public areas of the agency’s offices? *Yes*

Does the public notice include how to request additional information on your Title VI obligations? *Yes*

Does the public notice include how to file a complaint? *Yes*

#### **Complaint Procedures**

Did you include the (internal to the agency) procedures for investigating and tracking Title VI complaints filed against them? *Yes*

Did you include the instructions it gives to members of the public about how to file a Title VI discrimination complaint? *Yes*

Are the procedures for filing a Title VI discrimination complaint available on the agency website? *Yes*

#### **Complaint Form**

Does the program include a copy of the complaint form that specifies the three classes protected by Title VI (race, color, and national origin)? *Yes*

Is the complaint form available on the agency’s website? *Yes*

Did you include 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/or complaints naming the recipient? *N/A - no complaints received*

### **Public Participation Plan**

Did you include a Public Participation Plan that describes the proactive strategies, procedures, and desired outcomes of public participation activities? *Yes*

Does the Public Participation Plan include information on how the grantee considers the needs of, and engages minority and LEP populations in public participation activities? *Yes*

Did you summarize the public outreach and involvement activities undertaken in the last 3 years? *Yes*

### **Board Selections**

Did you select members to transit-related, non-elected planning boards, advisory councils or committees? *Yes*

If you select members, did you provide a table with a racial breakdown of the membership of those boards, councils, or committees? *Yes*

Did you describe how they encourage minorities to participate on these boards, councils, and committees? *Yes*

### **Subrecipient**

Does the program indicate if you have subrecipients? *No - No subrecipients*

If you have subrecipients, did you provide the monitoring procedures and/or efforts you use to ensure subrecipients comply with Title VI? *Not Included*

Did you describe the process used to provide assistance to subrecipients, when needed? *Not Included*

### **LEP Four-Factor Analysis & Plan**

Did you include a Language Assistance Plan? *Yes*

Does the Language Assistance Plan include a Four-Factor Analysis that determines the appropriate level of LEP assistance and outreach efforts needed? *Yes*

Did your Language Assistance Plan NOT include something? *Not Included*

## Facility Site Equity Analysis

Did you identify a site or location for a new facility (excluding bus shelters) or construct a facility during the period covered by your program? *No*

Did you complete and submit an equity analysis conducted during the planning stage for all projects requiring land acquisition and the displacement of persons from their residences and businesses? *Not Included*

Did the site analysis include outreach to persons potentially impacted by the siting of facilities? *Not Included*

Did the site analysis compare the equity impacts of alternative locations prior to selecting the preferred site? *Not Included*

Did you give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result? *Not Included*

Did you determine that the location of the project will result in a disparate impact on the basis of race, color, or national origin? *Not Included*

Did you provide a substantial legitimate justification for the project location? To do so, you must demonstrate that either 1) no alternative locations are available, or 2) any alternative locations, if identified, would result in the same or more disparate impact on the basis of race, color, or national origin. *Not Included*

## Chapter 4: FIXED ROUTE TRANSIT PROVIDER REQUIREMENTS

### Service Standards

Did you include your service standards and policies for each specific fixed route mode of service you provide? *Yes*

Which service standards, if any, are NOT included? *No service standards were missing from the submission*

### Service Policies

Are the current service policies included? *Yes*

Is there a description of how service policies are adopted to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin? *Yes*

Which service policies, if any, are NOT included? *None - All service policies are included*

## **Large Urbanized Fixed Route Requirements**

### **Demographic Data**

Are demographic and service profile maps and charts (demographic data) included? *Yes*

Is the demographic data current as of the most recent decennial census or American Community Survey? *Yes*

Does the program include a description of how demographic data is prepared prior to proposed service reductions or eliminations? *Yes*

Does the demographic data include a base map of the transit service area? *Yes*

Does the base map include overlays of the required data? *Yes*

Do the demographic maps appropriately identify areas where the minority population exceeds that of the service area as a whole? *Yes*

Do the demographic maps appropriately identify areas where the low-income population exceeds that of the service area as a whole? *Yes*

### **Ridership Surveys**

Do you collect demographic ridership and travel patterns using customer surveys? *Yes*

Which requirements of the ridership and travel pattern surveys are NOT met, if any? *Not Included*

### **Monitoring**

Do you include the results of monitoring service standards and policies? *Yes*

Which required transit monitoring methods are NOT included, if any? *Not Included*

### **SAFE Analysis**

Did you include the written policies and procedures for your service and fare equity analyses process? *Yes*

What required service and fare equity analysis policies or procedures are missing, if any? *A description of the public engagement process used for setting the Major Service Change*

*policy Disparate Impact policy and Disproportionate Burden policy (Additional document was upload to TrAMS)*

*No required policies and/or procedures were missing from the submission*

Did you identify any service and/or fare equity analyses from the last 3 years? *Yes*

Did you include the results of the service and/or fare equity analyses conducted in the last 3 years? *Yes*

If there were service and/or fare equity analyses conducted in the last 3 years, what required documentation is NOT included, if any? *No documentation elements were missing from the submission*

**FTA Reviewer Comments:**

*Verify the public participation for SAFE policies was uploaded to TrAMS before sending letter. (Additional documentation uploaded to TrAMS on 11/5/20)*

**Also, please visit the FTA Civil Rights webpage for more information:**

<https://www.transit.dot.gov/title6>



**ROCHESTER  
GENESEE REGIONAL  
TRANSPORTATION  
AUTHORITY**

## BOARD OF COMMISSIONERS AGENDA ITEM COVER SHEET

Board Meeting Date:	November 5, 2020
Presenter:	Daniel DeLaus
Subject:	Resolution to Adopt and Approve the 2020-2023 Title VI Program Plan
Background:	<p>Title VI of the Civil Rights Act of 1964 is a Federal statute which prohibits recipients of Federal funding from discriminating against persons based upon their race, color or national origin. As recipients of Federal funding, the Authority is bound to follow the mandates of Title VI.</p> <p>In order to ensure compliance with Title VI, the Federal Transit Administration (FTA) requires recipients to submit, for FTA approval, a Title VI Program Plan (the Plan) at a minimum every three years. The Plan delineates how a recipient intends to operate in compliance with Title VI during that period of time.</p> <p>The Plan requires a Public Participation Process, a Complaint process and a Limited English Proficient Language Assistance Process. In addition, policies for service monitoring and /or major service/fare changes must be documented in the Plan.</p> <p>The Authority updated the Plan to reflect the activities from the Reimagine RTS project. Reimagine RTS is a major service change and as a result, the plan includes a Major Service Change Equity Analysis. The Plan also reflects the changes from implementing the new fare technology for RTS Go (mobile ticketing) and as a result, the plan includes a Fare Equity Analysis.</p> <p>The Major Service Change Equity Analysis resulted in the conclusion that Reimagine RTS would not result in disparities for customers protected under Title VI.</p> <p>The Fare Equity Analysis revealed a disproportionate burden for low-income customers lacking bank accounts or credit cards. As a result, the Authority identified and implemented mitigating actions including development of a Smart Card media tool which will allow customers to continue using cash while having reloadable fare media.</p>



**Our Promise: RTS makes it easy to enjoy your journey.**

Title VI Program Plan June 2023-2026, Version 6



	<p>The Plan requires service monitoring and evaluations of Minority Routes at least once every three years to ensure that routes serving persons protected under Title VI have comparable levels of service and quality of service to those not protected under Title VI. The Authority's Minority Route Comparison Report found no discriminatory patterns in the levels of service and quality of service on its Minority Routes.</p> <p>The Authority performs a four-factor analysis to determine its exposure and interactions with Limited English Proficient (LEP) populations. Spanish-speaking LEP customers continue to represent the largest population using Authority services. As a result, the Authority will continue to provide Spanish telephonic interpreter services, Spanish translation of vital documents, and in-person Spanish interpreter service, barring financial hardship.</p>
Financial Impact:	The Authority's 2020-2021 Operating Budget provides funding for the Title VI Program Plan. Future Authority Operating Budgets will provide funding for the Title VI Program Plan.
Recommendation:	That the 2020-2023 Title VI Program Plan be approved in the form submitted to the Board of Commissioners.



**Resolution: RGRTA 42-2020****RESOLUTION TO ADOPT AND APPROVE THE 2020-2023 TITLE VI PROGRAM PLAN**

WHEREAS, the Rochester-Genesee Regional Transportation Authority is a recipient of Federal funding and thus required to abide by Title VI of the Civil Rights Law of 1964 and the regulations which implement that statute; and

WHEREAS, the Federal Transit Agency requires recipients to submit a Title VI Program Plan every three years; and

WHEREAS, Authority staff have prepared a proposed 2020-2023 Title VI Program Plan; and

WHEREAS, Authority staff have undertaken a Fare Equity analysis for a Fare media change (RTS Go, mobile ticketing) which has occurred since the submission of the last Authority Title VI Program Plan and staff have proposed mitigation efforts to address the disparate impact after the Equity analysis; and

NOW, THEREFORE, BE IT RESOLVED, the Authority's proposed 2020-2023 Title VI Program Plan is hereby adopted and approved; and

BE IT FURTHER RESOLVED that The Fare Equity analysis undertaken for the RTS Go mobile ticketing project is hereby acknowledged and approved, along with the proposed mitigation steps to address the disparate impact on low income customers; and

BE IT FURTHER RESOLVED that the Chief Executive Officer or his designee are hereby authorized, empowered and directed, for and on behalf of the authority, to perform any and all actions and to execute any and all documents on behalf of the Authority as they may deem necessary, appropriate or advisable to carry out the intent and purposes of the foregoing resolutions.

**CERTIFICATION**

The undersigned hereby certifies that the above is an excerpt from the Minutes of a Quarterly Meeting of the Rochester-Genesee Regional Transportation Authority, which was held on November 5, 2020 and that the Resolution is still in full force and effect.

  
\_\_\_\_\_  
Donald Jeffries, Chairman

Date: November 5, 2020  
Rochester, New York



# Title VI Program Plan 2020-2023

November 6, 2020



## Agenda

- What is Title VI?
- Key components
  - Program Narrative
  - Major Service Equity Analysis
  - Fare Equity Analysis
  - Service Performance Monitoring
  - Public Participation Plan
- Recommendation

The logo for RGRTA (Regional Growth and Revitalization Trust Authority) is displayed. It consists of the letters "RGRTA" in a bold, white, sans-serif font, centered within a blue rectangular box with rounded corners and a slight 3D effect.

## What is Title VI?

- Title VI of the Civil Rights Act of 1964 is a law where
  - “No person in the United States shall, on the grounds of **race, color, or national origin**, be excluded from participation in, be denied benefits of, or be subjected to discrimination under any program or activity receiving **Federal financial assistance**.”



## Changes in 2020-2023 Plan

Component	Change from prior plan
Program Narrative	Describes Reimagine RTS, addresses insufficiencies, and describes operational impact (COVID-19).
Equity Analyses (Service, Fare & Service performance monitoring)	Service Equity: Reimagine RTS resulted in no disparities for those covered by Title VI. Fare Equity: Title VI covered customers were disproportionately impacted; mitigations implemented by allowing cash to still be used. Service Performance Monitoring: No discriminatory patterns in level or quality of minority routes.
Limited English Proficiency Assistance	Continue providing translations and interpreters for Spanish speaking customers our largest population.
Public Participation Plan	Updated company info, removed post cards, and clarified public hearing section.





## Recommendation

**The 2020-2023 Title VI Program Plan be approved in the form submitted to the Board of Commissioners.**

**The Board authorizes the Authority to forward the Program Plan to the FTA for final concurrence.**



U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION 2  
New York & New Jersey

One Bowling Green, Room 428  
New York, NY 10004

August 19, 2019

Daniel DeLaus, General Counsel  
Rochester Genesee Regional Transportation Authority, Recipient ID: 1797  
1372 East Main St.  
Rochester, NY 14609

Re: Triennial Title VI Program Update

Dear Daniel DeLaus, General Counsel,

The Federal Transit Administration (FTA) has received and reviewed Rochester Genesee Regional Transportation Authority's Title VI program submitted on 6/1/2019. This Title VI program will be effective August 1, 2017 - July 31, 2020. The Department of Transportation (DOT) requires recipients of DOT funds to demonstrate compliance with Title VI of the Civil Rights Act of 1964 through regular compliance reports. The Federal Transit Administration's (FTA) Circular 4702.1B, "Title VI Program Guidelines for Federal Transit Administration Grantees" sets forth the information that should be included in these updates, and requires they be submitted as Title VI Programs submitted every three years.

FTA's review of your Title VI program considered all elements required by the Department of Transportation regulations found at 49 C.F.R. § 21, as outlined in Circular 4702.1B. The Review Assessment attached to this letter identifies the specific areas reviewed, any concerns, and relevant reviewer comments. To assure you are implementing Title VI program requirements in accordance with the regulations, you must promptly address and correct any concerns identified with a "no" in the Review Assessment. Your program status is now *Concur*. Your next triennial Title VI program submission is due to FTA on June 1, 2020. Please retain documentation as needed to demonstrate the corrections noted have been addressed. FTA typically verifies corrections have been made and implemented at the next oversight opportunity, but can request this information at any time.


Your Title VI program demonstrates your agency has the procedures and resources to ensure public transportation services are provided in a nondiscriminatory manner, as required by Title VI of the Civil Rights Act of 1964. FTA's review and concurrence on a Title VI program does not relieve recipients from the requirements and responsibilities outlined in Circular 4702.1B or of the DOT Title VI regulation at 49 CFR part 21. You must properly implement your program to ensure nondiscriminatory service, including full and fair participation in public transportation decision-making, and meaningful access to transit-related programs and activities by persons with limited English proficiency. If you use contractors or have subrecipients, you must monitor their compliance with Title VI. You can find these monitoring responsibilities in Chapter 2,



Section 6 (Contractors) and Chapter 3, Section 12 (Subrecipients) in the FTA Title VI Circular. As a basic requirement for Title VI compliance, you must develop a language assistance plan (LAP). Your LAP must include a Four Factor Analysis—you can find information on this analysis in Chapter 3, Section 6 of the FTA Title VI Circular. If you believe that your agency only serves an English-speaking population, you still must complete a Four Factor Analysis to demonstrate this.

Prior to implementing any major service changes or any fare change, transit agencies operating more than 50 vehicles in large urbanized areas must complete an equity analysis, and submit it for board review and approval. You can find more information on SAFE Analyses in Chapter 4, Section 7 of the FTA Title VI Circular. Large transit agencies must also collect and report demographic data, including data gathered through rider surveys, and monitor transit service relative to system-wide service standards and service policies. If you need technical assistance with you Service and Fare Equity (SAFE) Analysis, please contact your Regional Civil Rights Officer.

FTA is committed to providing technical assistance to help correct your Title VI program and to implement your program consistent with the regulations and guidance. In order to preserve paper, we are issuing this letter electronically via email and it is attached to your profile in TrAMS. Please do not hesitate to contact me directly at 212-668-2324 or at [l.a.rodriguez@dot.gov](mailto:l.a.rodriguez@dot.gov) if you have any questions.

Sincerely,  
  
Luis Rodriguez/s/  
Civil Rights Officer, Region 2

cc: Stephen Goodman, FTA Region 2, Regional Administrator  
Monica McCallum, FTA Civil Rights, Director of Regional Operations

## **Title VI Program Review Assessment:**

Items below identified as “YES” are included in the Title VI program review, and no changes are needed. Items identified as “NO” were not included or were insufficient and must be corrected. Carefully address all insufficient items, as indicated in this review letter, to ensure you are implementing your Title VI program in accordance with the regulations.

### **Chapter 3: GENERAL REQUIREMENTS AND GUIDELINES**

Does the program submission include appropriate documentation demonstrating that the transit board of directors has approved the Title VI program? *Yes*

#### **Public Notice**

Does the submission include a copy of the public notice informing the public of the protections against discrimination afforded to them under Title VI? *Yes*

Is there a list of public locations where the notice is posted? *Yes*

Did you verify the notice is posted on the agency’s website and in public areas of the agency’s offices? *Yes*

Does the public notice include how to request additional information on your Title VI obligations? *Yes*

Does the public notice include how to file a complaint? *Yes*

#### **Complaint Procedures**

Did you include the (internal to the agency) procedures for investigating and tracking Title VI complaints filed against them? *Yes*

Did you include the instructions it gives to members of the public about how to file a Title VI discrimination complaint? *Yes*

Are the procedures for filing a Title VI discrimination complaint available on the agency website? *Yes*

#### **Complaint Form**

Does the program include a copy of the complaint form that specifies the three classes protected by Title VI (race, color, and national origin)? *Yes*

Is the complaint form available on the agency’s website? *Yes*

Did you include 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/or complaints naming the recipient? *N/A - no complaints received*

### Public Participation Plan

Did you include a Public Participation Plan that describes the proactive strategies, procedures, and desired outcomes of public participation activities? *Yes*

Does the Public Participation Plan include information on how the grantee considers the needs of, and engages minority and LEP populations in public participation activities? *Yes*



Did you summarize the public outreach and involvement activities undertaken in the last 3 years? *No*

### Board Selections

Did you select members to transit-related, non-elected planning boards, advisory councils or committees? *Yes*

If you select members, did you provide a table with a racial breakdown of the membership of those boards, councils, or committees? *Yes*



Did you describe how they encourage minorities to participate on these boards, councils, and committees? *No*

### Subrecipient



Does the program indicate if you have subrecipients? *No - Program does not indicate if there are subrecipients*

If you have subrecipients, did you provide the monitoring procedures and/or efforts you use to ensure subrecipients comply with Title VI? *Not Included*

Did you describe the process used to provide assistance to subrecipients, when needed? *Not Included*

### LEP Four-Factor Analysis & Plan

Did you include a Language Assistance Plan? *Yes*

Does the Language Assistance Plan include a Four-Factor Analysis that determines the appropriate level of LEP assistance and outreach efforts needed? *Yes*

Did your Language Assistance Plan NOT include something? *Not Included*

## Facility Site Equity Analysis



Did you identify a site or location for a new facility (excluding bus shelters) or construct a facility during the period covered by your program? *No*

Did you complete and submit an equity analysis conducted during the planning stage for all projects requiring land acquisition and the displacement of persons from their residences and businesses? *Not Included*

Did the site analysis include outreach to persons potentially impacted by the siting of facilities? *Not Included*

Did the site analysis compare the equity impacts of alternative locations prior to selecting the preferred site? *Not Included*

Did you give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result? *Not Included*

Did you determine that the location of the project will result in a disparate impact on the basis of race, color, or national origin? *Not Included*

Did you provide a substantial legitimate justification for the project location? To do so, you must demonstrate that either 1) no alternative locations are available, or 2) any alternative locations, if identified, would result in the same or more disparate impact on the basis of race, color, or national origin. *Not Included*

## Chapter 4: FIXED ROUTE TRANSIT PROVIDER REQUIREMENTS

### Service Standards

Did you include your service standards and policies for each specific fixed route mode of service you provide? *Yes*

Which service standards, if any, are NOT included? *No service standards were missing from the submission*

### Service Policies

Are the current service policies included? *Yes*



Is there a description of how service policies are adopted to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin? *No*

Which service policies, if any, are NOT included? *Not Included*

## **Large Urbanized Fixed Route Requirements**

### **Demographic Data**

Are demographic and service profile maps and charts (demographic data) included? *Yes*

Is the demographic data current as of the most recent decennial census or American Community Survey? *Yes*

Does the program include a description of how demographic data is prepared prior to proposed service reductions or eliminations? *Yes*

Does the demographic data include a base map of the transit service area? *Yes*

Does the base map include overlays of the required data? *Yes*

Do the demographic maps appropriately identify areas where the minority population exceeds that of the service area as a whole? *Yes*

Do the demographic maps appropriately identify areas where the low-income population exceeds that of the service area as a whole? *Yes*

### **Ridership Surveys**

Do you collect demographic ridership and travel patterns using customer surveys? *Yes*

Which requirements of the ridership and travel pattern surveys are NOT met, if any? *Not Included*

### **Monitoring**

Do you include the results of monitoring service standards and policies? *Yes*

Which required transit monitoring methods are NOT included, if any? *A board resolution - copy of meeting minutes - or similar documentation as evidence of the board or governing entity or official's consideration awareness and approval of the monitoring results.*

## SAFE Analysis

Did you include the written policies and procedures for your service and fare equity analyses process? *Yes*

What required service and fare equity analysis policies or procedures are missing, if any? *No required policies and/or procedures were missing from the submission*

Did you identify any service and/or fare equity analyses from the last 3 years? *Yes*

Did you include the results of the service and/or fare equity analyses conducted in the last 3 years? *Yes*

If there were service and/or fare equity analyses conducted in the last 3 years, what required documentation is NOT included, if any? *No documentation elements were missing from the submission*

### FTA Reviewer Comments:

*Dan, Thank you for providing additional clarification on the fare changes to the Dial-A-Ride and Route Deviation services.*

**Also, please visit the FTA Civil Rights webpage for more information:**

<https://www.transit.dot.gov/title6>



**ROCHESTER  
GENESEE REGIONAL  
TRANSPORTATION  
AUTHORITY**

**BOARD OF COMMISSIONERS  
AGENDA ITEM COVER SHEET**

Board Meeting Date:	May 4, 2017
Presenter:	Daniel DeLaus
Subject:	2017-2020 Title VI Program Plan
Background:	<p>Title VI of the Civil Rights Act of 1964 is a Federal statute which prohibits recipients of Federal funding from discriminating against persons based upon their race, color or national origin. As recipients of Federal funding, RGRTA and its operational subsidiaries are bound to follow the mandates of Title VI.</p> <p>In order to ensure compliance with Title VI, the Federal Transit Administration (FTA) requires recipients to submit, for FTA approval, a Title VI Program Plan every three years. This Plan delineates how a recipient intends to operate in compliance with Title VI during that period of time.</p> <p>The major components of the Plan are a Public Participation Plan, Service Standards and Policies, a Major Service Change Policy, an Equity Analysis Process for any Major Service Changes, a Title VI Complaint process and a Limited English Proficient Language Assistance Plan.</p> <p>Staff is recommending changes to the Major Service Change Policy and the Equity Analysis Process.</p> <p>The Authority has had one Major Service Change since the last Program Plan was submitted and is recommending approval of the Equity Analysis that was undertaken for that.</p> <p>Public Information Sessions on the proposed Plan were held here at RGRTA on April 18, 2017 and April 20, 2017.</p>
Financial Impact:	The Authority's 2017-2018 Operating Budget provides funding for the Title VI Program Plan. Future Authority Operating Budgets will provide funding for the Title VI Program Plan.
Recommendation:	That the 2017-2020 Title VI Program Plan be approved in the form submitted to the Board of Commissioners.

Our Promise: RTS makes it easy to enjoy your journey.





**Resolution: RGRTA 30-2017****ADOPTING THE 2017-2020 TITLE VI PROGRAM PLAN**

WHEREAS, the Rochester-Genesee Regional Transportation Authority is a recipient of Federal funding and thus required to abide by Title VI of the Civil Rights Law of 1964 and the regulations which implement that statute; and

WHEREAS, the Federal Transit Agency requires recipients to submit a Title VI Program Plan every three years; and

WHEREAS, Authority staff have prepared a proposed 2017-2020 Title VI Program Plan; and

WHEREAS, Authority staff have undertaken an Equity Analysis for the Major Service Change which occurred since the submission of the last Title VI Program Plan;

NOW, THEREFORE, BE IT RESOLVED by the Authority that:

1. The Authority's 2017-2020 Title VI Program Plan in the form submitted to this Board is hereby adopted and approved for submission to FTA and implementation.
2. The Equity analysis undertaken for the Major Service Change on Route 16 is hereby acknowledged and approved.
3. The Chief Executive Officer or his designee is hereby authorized, empowered and directed, for and on behalf of the Authority, to perform any and all actions and to execute any and all documents on behalf of the Authority as may be deemed necessary, appropriate or advisable to carry out the intent and purposes of the foregoing resolution.

**CERTIFICATION**

The undersigned hereby certifies that the above is an excerpt from the Minutes of a Quarterly Meeting of the Rochester Genesee Regional Transportation Authority, which was held on May 4, 2017 and that the Resolution is still in full force and effect.



Geoffrey Astles, Chairman

Date: May 4, 2017  
Rochester, New York



RGRTA

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# Title VI Program Plan 2017-2020

May 04, 2017

The logo for the Regional Growth and Rural Transit Authority (RGRTA) is displayed. It consists of the letters "RGRTA" in a white, bold, sans-serif font, set against a dark blue rectangular background with a slight gradient and a thin white border.

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## Agenda

- ☐ What is Title VI & What Does it Mean to RGRTA?
- ☐ Key Components of the Program Plan
- ☐ Key Changes We Propose
- ☐ Route 16 Crosstown
- ☐ Recommendation



RGRTA

## Title VI and RGRTA

### ☐ Title VI of the Civil Rights Act of 1964 is a law where

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

### ☐ We use a Title VI Program Plan to ensure compliance

### ☐ We update it every 3 years

- Realign with changes in population & ridership
- Expires in July 2017

### ☐ Requires Board Approval and FTA Acceptance



## Key Components of the Program Plan

### ☐ General Requirements

- Notification of Rights
- Complaint Process
- Limited English Proficiency Assistance
- Public Participation Process

### ☐ Fixed Route Requirements

- Policies for Service Monitoring
- Policies for Major Service Changes
- Board Approval of Equity Analyses



## Public Information Sessions

### Information Sessions Title VI Policy

Learn more about updates  
being made to RGRTA's Title VI Policy.

**RGRTA  
Administration Building  
1372 E. Main St., Rochester**

**-Session A-  
Tuesday, April 18  
from 5:30 - 6:30pm**

**-Session B-  
Thursday, April 20  
from 11am - Noon**

*Information presented will be the same at both sessions*

For alternative language assistance, please call 585-268-1700 at least three days prior to the session you plan to attend.

Can't attend? Provide feedback by calling 585-268-1700 or visiting myRTA.org

Part of the Title VI program for Title VI, RGRTA is committed to providing language assistance to non-English speaking residents.

### Enjoy the Ride.

**Information Sessions  
Title VI Program Plan**

[Learn about our Title VI Program Plan for 2017-2020.](#)

Two sessions, both held at the RGRTA Administration Building, 1372 E. Main St., Rochester

- Tuesday, April 18 from 5:30 - 6:30pm
- Thursday, April 20 from 11am - Noon

**Sorry? Not Sorry**

If you shop at the Henrietta Wegmans, you may have noticed a brand new bus shelter standing tall along Hylan Drive.

The glass and steel shelter sits on a concrete pad (transit speak for "paved bus stop area") and provides customers a place to rest and stay protected from the elements while they wait for the bus. RTS had been working on adding a shelter to the stop (Hylan and Wegmans, ID 1785) for more than a year when, in late 2019, it received attention after being named "Sorriest Bus Stop in America."



[Enjoy the Ride blog](#)



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### INFO SESSION

Join us for a free information session on Tuesday, April 18, 5:30-6:30pm and Thursday, April 20, 11am-noon at the RGRTA Administration Building, 1372 E. Main St., Rochester.

[Click here to register.](#)

**April 18 and April 20**


 RGRTA

## Key Changes We Propose

Program Plan Component	Proposed Change
Notification of Rights	Updating bus decals & posters
Complaint Process	Revised generic process to achieve consistency & relevance
LEP Language Assistance	<ul style="list-style-type: none"> <li>• Bi-lingual decals for RTS (English / Spanish)</li> <li>• Bi-lingual complaint Instructions (English / Spanish)</li> <li>• Operator awareness in serving LEP individuals</li> </ul>
Public Participation Plan	Updated to reflect current practices and technology
Service Monitoring Policies	Updated to reflect current practices & reduce confusion Definition of Minority Route
Service Change Policies	Definition of Major Service Change Equity Analyses Thresholds



The logo for RGRTA (Riverside-Greyhound Regional Transit Authority) is displayed. It consists of the letters "RGRTA" in a white, bold, sans-serif font, set against a dark blue rectangular background with rounded corners. A thin green horizontal line is positioned directly beneath the blue rectangle.**RGRTA**

## Service Monitoring Policies

2014-2017 RGRTA System-Wide Standards and Policies	2017-2020 Title VI Program Policies for Service Changes & Service Monitoring on RTS Fixed Routes
RTS Service Standards	Title VI Service Monitoring
Minority Customer Route undefined	Minority Customer Route defined
RTS Service Standards included OTP for RTS and OTP for Regionals	Criteria for Level of Service Removed OTP from section because it is a quality measure

The logo for RGRTA (Riverside-Greenville Regional Transit Authority) is displayed. It consists of the letters "RGRTA" in a white, bold, sans-serif font, set against a dark blue rectangular background with a thin green border at the bottom.

## Service Monitoring Policies

2014-2017 RGRTA System-Wide Standards and Policies	2017-2020 Title VI Program Policies for Service Changes & Service Monitoring on RTS Fixed Routes
<b>RTS Service Policies</b> <ul style="list-style-type: none"><li>• Bus Assignments</li><li>• Service Allocation and Distribution</li><li>• RTS Distribution of Amenities</li><li>• RGRTA Subsidiary Service Policies for Bus Assignments and Amenities</li></ul>	<b>Criteria for Quality of Service</b> <ul style="list-style-type: none"><li>• Updated to reflect current route types, amenity distribution</li><li>• Moved OTP to this section</li><li>• Focused on RTS Monroe, not subsidiaries</li></ul>

The logo for RGRTA (Riverside-Glenview Regional Transit Authority) is displayed in white text on a dark blue rectangular background. The background of the slide features a blurred image of a road with white lane markings receding into the distance.

## Service Change Policies

2014-2017 Major Service Change	2017-2020 Major Service Change
A change or changes in any route other than a subsidized route extension, an experimental route, or an express transfer service route that (i) changes the number of service hours operated on a route by 25% or more; (ii) changes the length of a route by 25% or more; or (iii) effects more than 10 customers, on average, per trip.	A change or changes in any route other than a subsidized route extension, an experimental route, or an express transfer service route that <b>either</b> changes the number of service hours operated on a route by 25% or more; <b>OR</b> changes the length of the route <b>structure</b> by 25% or more. <b>Route structure refers to the length of a route based on map coverage rather than based on vehicle miles.</b>

The logo for the Regional Growth and Recovery Transportation Authority (RGRTA) is displayed. It consists of the letters "RGRTA" in a white, bold, sans-serif font, set against a dark blue rectangular background with rounded corners. The logo is positioned on the left side of the slide, above a horizontal line.

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## Service Change Policies

### Equity Analyses Thresholds

If there is a **Major Service Change**, we conduct **2 equity analyses** and present the results to the Board.

1– Disparate Impact	2 – Disproportionate Burden
Unfair impact to people of <b>color</b> .	Unfair impact to people of <b>low income</b> .

The logo for the Regional Government of the Republic of the Philippines (RGRTA) is displayed. It consists of the letters "RGRTA" in a bold, white, sans-serif font, set against a dark blue rectangular background with a thin green border.

## Service Change Policies

2014-2017 Disparate Impact Threshold	2017-2020 Disparate Impact Threshold
Any time a major service or fare change poses a difference in adverse effect on a minority population versus a non-minority population of plus or minus 25% it shall be deemed to have a disparate impact.	Any time a Major Service Change or fare change <b>to one or more RTS fixed routes</b> poses a difference in Adverse Effect on Minority <b>Customers</b> versus non-minority customers greater than <b>±20% above or below the system average for Minority Customers</b> , the change shall be deemed to have a Disparate Impact.

The logo for the Regional Government of the Republic of the Philippines (RGRTA) is displayed. It consists of the letters "RGRTA" in a bold, white, sans-serif font, set against a dark blue rectangular background with a thin green border at the bottom.

## Service Change Policies

2014-2017 Disproportionate Burden Threshold	2017-2020 Disproportionate Burden Threshold
Any time a major service or fare change poses a difference in adverse effect on a low income population versus a non-low-income population of plus or minus 25% it shall be deemed to have a disproportionate burden.	Any time a Major Service Change or fare change <b>to one or more RTS fixed routes</b> poses a difference in Adverse Effect on a Low-Income Population versus a non-low-income population of <b>±20% above or below the system average for Low-Income Customers</b> , it shall be deemed to have a Disproportionate Burden.



The logo for the Regional Growth and Resource Transfer Authority (RGRTA) is displayed. It consists of the letters "RGRTA" in a white, bold, sans-serif font, set against a dark blue rectangular background with a thin yellow border.

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## If Equity Analysis Shows Disparity

- ☐ Take measures to mitigate the impact of the proposed action
- ☐ Demonstrate that both a legitimate business purpose cannot otherwise be accomplished; and
- ☐ The proposed change is the least discriminatory alternative





## Route 16 Service Change

- ☐ Extends all trips on Route 16 Crosstown from Foodlink to LiDestri on Lee Road
- ☐ Route structure increase of 35.77%
- ☐ Per 2014-2017 criteria, equity analysis shows no disparate impact or disproportionate burden

	Minority	<\$15k	<\$25k	<\$50k
System	68.1%	44.0%	68.0%	81.0%
Route 16	64.5%	35.5%	61.3%	77.4%
Difference	-3.6%	-8.5%	-6.7%	-3.6%
% Difference	-5.3%	-19.4%	-9.9%	-4.4%



## Recommendations

- ☐ The Board approves the 2017-2020 Title VI Program Plan in the form submitted to the Board on May 04, 2017.
- ☐ The Board approves the results of the Disparate Impact and Disproportionate Burden equity analyses on the major service change to Route 16 in the form submitted to the Board on May 04, 2017.

## EXHIBITS

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# Exhibit 04: Examples of Notices to the Public

## Exhibit 04 Notice to the Public Table of Contents

Title VI Notices to the Public During Program Period 2020-2023 .....	136
Title VI Notices to the Public During Program Period 2017-2020 .....	141

## Title VI Notices to the Public During Program Period 2020-2023

All notices from 2017-2020 program period continued during the 2020-2023 period. Additional text was added which states how people can request information about RGRTA's civil rights program or obligations under Title VI. The following examples show the updated notices.

(1) Updated [www.myrts.com/titlevi](http://www.myrts.com/titlevi) notice.

(2) Updated Large Print Spanish notice is a linked PDF on [www.myrts.com/titlevi](http://www.myrts.com/titlevi).

I am traveling in **MONROE** Change Text Size: A A A

[Home](#) > [About Us](#) > [Policies and Procedures](#) > [Title VI Program Plan](#)

## Title VI Program Plan

### Title VI Standards & Policies

[Download the Title VI Standards & Policies for 2020-2023](#)

**Public Information Concerning Title VI of the Civil Rights Act of 1964, as Amended**

RGRTA, as a recipient of federal funding, gives public notice of its policy to fully comply with Title VI of the Civil Rights Act of 1964 and all related laws and statutes.

No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any RTS program or activity, as provided by Title VI of the Civil Rights Act of 1964 and as amended.

RGRTA operates its programs without regard to race, color, or national origin.

To request information about RGRTA's civil rights program or obligations under Title VI, please:

- Call Customer Service at (585) 288-1700
- Use [myRTS.com/contact-us](http://myRTS.com/contact-us)
- Visit the Administration Office at 1372 East Main Street, Rochester, NY (business hours are Monday through Friday, 8:00 AM to 5:00 PM)

Any person who believes that he or she has individually, or as a member of any specific class of persons, been excluded from participation in, been denied the benefits of, or otherwise subjected to discrimination under any RGRTA service, program, or activity, and believes the discrimination is based upon race, color, or national origin has the right to file a Title VI complaint with RGRTA.

All complaints must be filed in writing with the RGRTA Legal Department within 180 days of the alleged discriminatory act or occurrence. Complaint forms may be obtained through the following contacts:

- (585) 288-1700
- [myRTS.com/contact-us](http://myRTS.com/contact-us)

In addition to the Title VI process at RGRTA, Title VI complaints may be filed with the Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

[En Español.](#)

**Our Board of Commissioners**  
[Board of Commissioners Meetings](#)  
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[On Demand \(Monroe\)](#)  
[Dial-A-Ride \(Regional\)](#)  
[Complementary Paratransit \(Monroe\)](#)  
[Policies and Procedures](#)  
[Title VI Program Plan](#)  
[App Policies](#)  
[RTS Go Mitigation](#)



(2) Continued - Large Print Spanish version available as a linked PDF on [www.myrts.com/titlevi](http://www.myrts.com/titlevi).

## Title VI Program Plan

### Title VI Standards & Policies

Download the Title VI Standards & Policies for 2020-2023

#### Public Information Concerning Title VI of the Civil Rights Act of 1964, as Amended

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RGRTA operates its programs without regard to race, color, or national origin.

To request information about RGRTA's civil rights program or obligations under Title VI, please:

- Call Customer Service at (585) 288-1700
- Use [myRTS.com/contact-us](http://myRTS.com/contact-us)
- Visit the Administration Office at 1372 East Main Street, Rochester, NY (business hours are Monday through Friday, 8:00 AM to 5:00 PM)

Any person who believes that he or she has individually, or as a member of any specific class of persons, been excluded from participation in, been denied the benefits of, or otherwise subjected to discrimination under any RGRTA service, program, or activity, and believes the discrimination is based upon race, color, or national origin has the right to file a Title VI complaint with RGRTA.

All complaints must be filed in writing with the RGRTA Legal Department within 180 days of the alleged discriminatory act or occurrence. Complaint forms may be obtained through the following contacts:

- (585) 288-1700
- [myRTS.com/contact-us](http://myRTS.com/contact-us)

In addition to the Title VI process at RGRTA, Title VI complaints may be filed with the Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC.

En Español.

2

### Aviso para el público sobre los derechos de conformidad con el Título VI

RGRTA, como receptor de fondos federales, da aviso público de su política de cumplir plenamente con el Título VI de la Ley de Derechos Civiles de 1964 y todas las leyes y estatutos relacionados.

Según lo dispuesto por el Título VI de la Ley de Derechos Civiles de 1964 y sus enmiendas, ninguna persona en los Estados Unidos será excluida de participar en ningún programa o actividad de RTS por motivos de raza, color u origen nacional, ni se le negarán los beneficios de dichos programas y actividades, así como tampoco será sometida a discriminación en ninguno de los mencionados.

RGRTA opera sus programas sin distinción de raza, color u origen nacional.

Para solicitar información sobre el programa de derechos civiles de RGRTA o las obligaciones conforme al Título VI, por favor, realice cualquiera de los siguientes pasos:

- Llamar al Servicio al cliente al teléfono (585) 288-1700, o
- Utilizar [myRTS.com/contact-us](http://myRTS.com/contact-us), o
- Visitar la oficina de Administración en 1372 East Main Street, Rochester, NY (el horario de atención es de lunes a viernes, de 8:00 a. m. a 5:00 p. m.)

Cualquier persona que crea haber sido, individualmente o como miembro de cualquier grupo específico de personas, excluida de participar en cualquier servicio, programa o

actividad de RGRTA, o que le hayan sido negado los beneficios de dichos servicios, programas o actividades o que, de otra manera haya sido sujeto de discriminación en relación con cualesquiera de estos, y además cree que la discriminación se basa en la raza, el color o el origen nacional tiene el derecho de presentar una queja de conformidad con el Título VI ante RGRTA.

Todas las quejas deben presentarse por escrito ante el Departamento de Asuntos Legales de RGRTA dentro de los 180 días posteriores al supuesto acto u ocurrencia discriminatorios. Los formularios de queja se pueden obtener a través de los siguientes contactos:

(585) 288-1700

[myRTS.com/titleVI](http://myRTS.com/titleVI)

[myRTS.com/contact-us](http://myRTS.com/contact-us)

Además del proceso respecto del Título VI en RGRTA, las quejas relacionadas con del Título VI se pueden presentar ante la Oficina de Derechos Civiles de la Administración Federal de Tránsito (Federal Transit Administration, Office of Civil Rights), 1200 New Jersey Avenue SE, Washington, DC 20590.

- (3) Interior card ("rail card") posted inside fixed route 40 ft. and 60 ft. buses.
- (4) Message displayed on digital monitors at every gate in the RTS Transit Center.

3



REGIONAL TRANSIT SERVICE

For information about RGRTA's civil rights program or Title VI,  
call (585) 288-1700 or use [myRTS.com/contact-us](https://myRTS.com/contact-us).

Para solicitar información sobre el programa de derechos  
civiles de RGRTA o el Título VI, llame al (585) 288-1700  
o utilice [myRTS.com/contact-us](https://myRTS.com/contact-us).

4

**For information about RGRTA's civil rights program or Title VI,  
call (585) 288-1700 or use [myRTS.com/contact-us](https://myRTS.com/contact-us).**

**Para solicitar información sobre el programa de derechos  
civiles de RGRTA o el Título VI, llame al (585) 288-1700 o  
utilice [myRTS.com/contact-us](https://myRTS.com/contact-us).**



REGIONAL TRANSIT SERVICE


*Note: Decals from the 2017-2020 period are onboard all vehicles for all subsidiaries. A process for replacing the decals to include the updated text will be developed and implemented during the 2023-2026 program period. A sample of the 2017-2020 decal is on page 6 of this exhibit.*



(5) Updated notice posted lobby/reception area in 1372 East Main RTS Administration Building and Customer Info Desks at the RTS Transit Center (sample shows update, not full text).

(6) Updated notices included with RTS Access paratransit eligibility certification communication (sample shows update, not full text.) Large print version (not shown) was also updated.

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**REGIONAL TRANSIT SERVICE**

January 2023

**Notice to the Public of Rights Under Title VI**  
 RGRTA, as a recipient of federal funding, gives public notice of its policy to fully comply with Title VI of the Civil Rights Act of 1964 and all related laws and statutes.

No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any RTS program or activity, as provided by Title VI of the Civil Rights Act of 1964 and as amended.

RGRTA operates its programs without regard to race, color, or national origin.

To request information about RGRTA's civil rights program or obligations under Title VI, please:

- Call Customer Service at (585) 288-1700
- Use [myRTS.com/contact-us](http://myRTS.com/contact-us)
- Visit the Administration Office at 1372 East Main Street, Rochester, NY (business hours are Monday through Friday, 8:00 AM to 5:00 PM)

Any person who believes that he or she has individually, or as a member of any specific class of persons, been excluded from participation in, been denied the benefits of, or otherwise subjected to discrimination under any RGRTA service, program, or activity, must believe the discrimination is based

**Título VI Aviso al Público de la Ley de Derechos**  
 RGRTA como recipiente de fondos federales da aviso al público sobre su política para asegurar la conformidad de Título VI de la Ley de Derechos Civiles de 1964 y cada ley o estatuto relacionado.

Ninguna persona en los Estados Unidos por causa de su raza, color, o origen nacional sea excluida de participar en, ser negada los beneficios de, o ser de otra manera sujeta a la discriminación bajo cualquier programa o actividad que recibe asistencia financiera federal conforme a lo dispuesto por el Título VI de la Ley de Derechos Civiles de 1964 con todas sus modificaciones.


RGRTA conduce sus programas sin considerar raza, color, ni origen nacional.

Para solicitar información sobre el programa de derechos civiles de RGRTA o las obligaciones conforme al Título VI, por favor, realice cualquiera de los siguientes pasos:

- Llamar al Servicio al cliente al teléfono (585) 288-1700
- Utilizar [myRTS.com/contact-us](http://myRTS.com/contact-us)
- Visitar la oficina de Administración en 1372 East Main Street, Rochester, NY (el horario de atención es de lunes a viernes, de 8:00 a. m. a 5:00 p. m.)

Cada persona que crea haber sido individualmente, o por ser miembro de una clase específica de personas,

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**ACCESS**

January 2023

**Notice to the Public of Rights Under Title VI**  
 RGRTA, as a recipient of federal funding, gives public notice of its policy to fully comply with Title VI of the Civil Rights Act of 1964 and all related laws and statutes.

No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any RTS program or activity, as provided by Title VI of the Civil Rights Act of 1964 and as amended.

RGRTA operates its programs without regard to race, color, or national origin.

To request information about RGRTA's civil rights program or obligations under Title VI, please:

- Call Customer Service at (585) 288-1700
- Use [myRTS.com/contact-us](http://myRTS.com/contact-us)
- Visit the Administration Office at 1372 East Main Street, Rochester, NY (business hours are Monday through Friday, 8:00 AM to 5:00 PM)

Any person who believes that he or she has

**Título VI Aviso al Público de la Ley de Derechos**  
 RGRTA como recipiente de fondos federales da aviso al público sobre su política para asegurar la conformidad de Título VI de la Ley de Derechos Civiles de 1964 y cada ley o estatuto relacionado.

Ninguna persona en los Estados Unidos por causa de su raza, color, o origen nacional sea excluida de participar en, ser negada los beneficios de, o ser de otra manera sujeta a la discriminación bajo cualquier programa o actividad que recibe asistencia financiera federal conforme a lo dispuesto por el Título VI de la Ley de Derechos Civiles de 1964 con todas sus modificaciones.

RGRTA conduce sus programas sin considerar raza, color, ni origen nacional.

Para solicitar información sobre el programa de derechos civiles de RGRTA o las obligaciones conforme al Título VI, por favor, realice cualquiera de los siguientes pasos:


- Llamar al Servicio al cliente al teléfono (585) 288-1700
- Utilizar [myRTS.com/contact-us](http://myRTS.com/contact-us)
- Visitar la oficina de Administración en 1372 East Main Street, Rochester, NY (el horario de atención es de lunes a viernes, de 8:00 a. m. a 5:00 p. m.)

Cada persona que crea haber sido individualmente, o por ser miembro de una clase específica de personas,



(7) Updated notices posted at Regional RTS offices (sample showing update, not full text.) All Regional offices have an updated notice but the samples included here show RTS Ontario, RTS Orleans, RTS Wayne.

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January 2023

**Notice to the Public of Rights Under Title VI**

RGRTA, as a recipient of federal funding, gives public notice of its policy to fully comply with Title VI of the Civil Rights Act of 1964 and all related laws and statutes.

No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any RTS program or activity, as provided by Title VI of the Civil Rights Act of 1964 and as amended.

RGRTA operates its programs without regard to race, color, or national origin.

To request information about RGRTA's civil rights program or obligations under Title VI, please:

- Call Customer Service at (585) 288-1700
- Use [myRTS.com/contact-us](https://myRTS.com/contact-us)
- Visit the Administration Office at 1372 East Main Street, Rochester, NY (business hours are Monday through Friday, 8:00 AM to 5:00 PM)

Any person who believes that he or she has individually, or as a member of any specific class of persons, been excluded from participation in, been denied the benefits of, or otherwise subjected to discrimination under any RGRTA service, program, activity, and believes the discrimination is based on race, color, or national origin has the right to file

**Título VI Aviso al Público de la Ley de Derechos**


RGRTA como recipiente de fondos federales da aviso al público sobre su política para asegurar la conformidad de Título VI de la Ley de Derechos Civiles de 1964 y cada ley o estatuto relacionado.

Ninguna persona en los Estados Unidos por causa de su raza, color, o origen nacional sea excluida de participar en, ser negada los beneficios de, o ser de otra manera sujeta a la discriminación bajo cualquier programa o actividad que recibe asistencia financiera federal conforme a lo dispuesto por el Título VI de la Ley de Derechos Civiles de 1964 con todas sus modificaciones.

RGRTA conduce sus programas sin considerar raza, color, ni origen nacional.

Para solicitar información sobre el programa de derechos civiles de RGRTA o las obligaciones conforme al Título VI, por favor, realice cualquiera de los siguientes pasos:

- Llamar al Servicio al cliente al teléfono (585) 288-1700



January 2023

**Notice to the Public of Rights Under Title VI**

RGRTA, as a recipient of federal funding, gives public notice of its policy to fully comply with Title VI of the Civil Rights Act of 1964 and all related laws and statutes.

No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any RTS program or activity, as provided by Title VI of the Civil Rights Act of 1964 and as amended.

RGRTA operates its programs without regard to race, color, or national origin.

To request information about RGRTA's civil rights program or obligations under Title VI, please:

- Call Customer Service at (585) 288-1700

**Título VI Aviso al Público de la Ley de Derechos**

RGRTA como recipiente de fondos federales da aviso al público sobre su política para asegurar la conformidad de Título VI de la Ley de Derechos Civiles de 1964 y cada ley o estatuto relacionado.


Ninguna persona en los Estados Unidos por causa de su raza, color, o origen nacional sea excluida de participar en, ser negada los beneficios de, o ser de otra manera sujeta a la discriminación bajo cualquier programa o actividad que recibe asistencia financiera federal conforme a lo dispuesto por el Título VI de la Ley de Derechos Civiles de 1964 con todas sus modificaciones.

RGRTA conduce sus programas sin considerar raza, color, ni origen nacional.

Para solicitar información sobre el programa de derechos civiles de RGRTA o las obligaciones conforme al Título VI, por favor, realice cualquiera de los siguientes pasos:

- Llamar al Servicio al cliente al teléfono (585) 288-1700
- Utilizar [myRTS.com/contact-us](https://myRTS.com/contact-us)
- Visitar la oficina de Administración en 1372 East Main Street, Rochester, NY (el horario de atención es de lunes a viernes, de 8:00 a. m. a 5:00 p. m.)

Cada persona que crea haber sido individualmente, o



January 2023

**Notice to the Public of Rights Under Title VI**

RGRTA, as a recipient of federal funding, gives public notice of its policy to fully comply with Title VI of the Civil Rights Act of 1964 and all related laws and statutes.

No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any RTS program or activity, as provided by Title VI of the Civil Rights Act of 1964 and as amended.

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- Call Customer Service at (585) 288-1700
- Use [myRTS.com/contact-us](https://myRTS.com/contact-us)
- Visit the Administration Office at 1372 East Main Street, Rochester, NY (business hours are Monday through Friday, 8:00 AM to 5:00 PM)

Any person who believes that he or she has individually, or as a member of any specific class of persons, been excluded from participation in, been denied the benefits of, or otherwise subjected to discrimination under any RGRTA service, program, or activity, and believes the discrimination is based upon

**Título VI Aviso al Público de la Ley de Derechos**

RGRTA como recipiente de fondos federales da aviso al público sobre su política para asegurar la conformidad de Título VI de la Ley de Derechos Civiles de 1964 y cada ley o estatuto relacionado.

Ninguna persona en los Estados Unidos por causa de su raza, color, o origen nacional sea excluida de participar en, ser negada los beneficios de, o ser de otra manera sujeta a la discriminación bajo cualquier programa o actividad que recibe asistencia financiera federal conforme a lo dispuesto por el Título VI de la Ley de Derechos Civiles de 1964 con todas sus modificaciones.

RGRTA conduce sus programas sin considerar raza, color, ni origen nacional.

Para solicitar información sobre el programa de derechos civiles de RGRTA o las obligaciones conforme al Título VI, por favor, realice cualquiera de los siguientes pasos:

- Llamar al Servicio al cliente al teléfono (585) 288-1700
- Utilizar [myRTS.com/contact-us](https://myRTS.com/contact-us)
- Visitar la oficina de Administración en 1372 East Main Street, Rochester, NY (el horario de atención es de lunes a viernes, de 8:00 a. m. a 5:00 p. m.)


Cada persona que crea haber sido individualmente, o



## Title VI Notices to the Public During Program Period 2017-2020

- (1) Bilingual flyer for posting in public locations such as the lobby/reception area in 1372 East Main and Customer Info Desks at the RTS Transit Center. The quality of the Spanish translation was improved in 2018.
- (2) Bilingual decal installed on all RGRTA vehicle fleets for all subsidiaries and part of the decal package for any new vehicle.

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**Notice to the Public of Rights Under Title VI**  
RGRTA, as a recipient of federal funding, gives public notice of its policy to fully comply with Title VI of the Civil Rights Act of 1964 and all related laws and statutes.

No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any RTS program or activity, as provided by Title VI of the Civil Rights Act of 1964 and as amended.

RGRTA operates its programs without regard to race, color, or national origin.

Any person who believes that he or she has individually, or as a member of any specific class of persons, been excluded from participation in, been denied the benefits of, or otherwise subjected to discrimination under any RGRTA service, program, or activity, and believes the discrimination is based upon race, color, or national origin has the right to file a Title VI complaint with RGRTA.

All complaints must be filed in writing with the RGRTA Legal Department within 180 days of the alleged discriminatory act or occurrence. Complaint forms may be obtained through the following contacts:

- (585) 288-1700
- [myRTS.com/TitleVI](http://myRTS.com/TitleVI)
- [myRTS.com/contact-us](mailto:myRTS.com/contact-us)

In addition to the Title VI process at RGRTA, Title VI complaints may be filed with the Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

**Aviso para el público sobre los derechos de conformidad con el Título VI**  
RGRTA, como receptor de fondos federales, da aviso público de su política de cumplir plenamente con el Título VI de la Ley de Derechos Civiles de 1964 y todas las leyes y estatutos relacionados.

Según lo dispuesto por el Título VI de la Ley de Derechos Civiles de 1964 y sus enmiendas, ninguna persona en los Estados Unidos será excluida de participar en ningún programa o actividad de RTS por motivos de raza, color u origen nacional, ni se le negarán los beneficios de dichos programas y actividades, así como tampoco será sometida a discriminación en ninguno de los mencionados.

RGRTA opera sus programas sin distinción de raza, color u origen nacional.

Cualquier persona que crea haber sido, individualmente o como miembro de cualquier grupo específico de personas, excluida de participar en cualquier servicio, programa o actividad de RGRTA, o que le hayan sido negado los beneficios de dichos servicios, programas o actividades o que, de otra manera haya sido sujeto de discriminación en relación con cualquiera de estos, y además cree que la discriminación se basa en la raza, el color o el origen nacional tiene el derecho de presentar una queja de conformidad con el Título VI ante RGRTA.

Todas las quejas deben presentarse por escrito ante el Departamento de Asuntos Legales de RGRTA dentro de los 180 días posteriores al supuesto acto u ocurrencia discriminatorios. Los formularios de queja se pueden obtener a través de los siguientes contactos:

- (585) 288-1700
- [myRTS.com/TitleVI](http://myRTS.com/TitleVI)
- [myRTS.com/contact-us](mailto:myRTS.com/contact-us)

Además del proceso respecto del Título VI en RGRTA, las quejas relacionadas con el Título VI se pueden presentar ante la Oficina de Derechos Civiles de la Administración Federal de Tránsito (Federal Transit Administration, Office of Civil Rights), 1200 New Jersey Avenue SE, Washington, DC 20590.

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### Title VI Notice Regional Transit Service

RTS operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

Any person who believes he or she has experienced any unlawful discriminatory practice under Title VI, may file a written complaint with the RGRTA Legal Department within 180 of the alleged discriminatory act.

To learn about Title VI or the procedures for filing a complaint visit [www.myRTS.com/TitleVI](http://www.myRTS.com/TitleVI)

Call 585-288-1700 or use [www.myRTS.com/contact-us](http://www.myRTS.com/contact-us) to request language assistance or an accessible format.

Complaints may also be filed with the Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

### Título VI Aviso Regional Transit Service

RTS opera sus programas y servicios sin distinción de raza, color y origen nacional, de conformidad con el Título VI del Acta de Derechos Civiles.

Cualquier persona que cree que él / ella ha experimentado cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja ante RTS.

Para obtener más información sobre el programa de RGRTA los derechos civiles, los procedimientos para presentar una queja, y el proceso de respuesta:

- Llame al 585-288-1700
- Visite [www.myRTS.com/contact-us](http://www.myRTS.com/contact-us)
- O visite [www.myRTS.com/TitleVI](http://www.myRTS.com/TitleVI)

Las quejas también podrán ser presentadas directamente ante la Administración Federal de Tránsito poniéndose en contacto con la Oficina de Derechos Civiles, 1200 New Jersey Ave., NW, Washington, DC 20590.

Si se necesita información en otro idioma, por favor llamen al 585-288-1700.

(3) Large print (18 point font) notices in English and Spanish for low-vision applicants for paratransit eligibility and paratransit eligible RTS Access customers.

(4) Abbreviated notice posted on all RTS Transit Center digital monitors at every busway gate. The message appears in English and in Spanish and is displayed every quarter.

3

**Notice to the Public of Rights Under Title VI**

RGRTA, as a recipient of federal funding, gives public notice of its policy to fully comply with Title VI of the Civil Rights Act of 1964 and all related laws and statutes.

No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any RTS program or activity, as provided by Title VI of the Civil Rights Act of 1964 and as amended.

RGRTA operates its programs without regard to race, color, or national origin. Any person who believes that he or she has individually, or as a member of any specific class of persons, been excluded from participation in, been denied the benefits of, or otherwise subjected to discrimination under any RGRTA service, program, or activity, and believes the discrimination is based upon race, color, or national origin has the right to file a Title VI complaint with RGRTA.

All complaints must be filed in writing with the RGRTA Legal Department within 180 days of the alleged discriminatory act or occurrence. Complaint forms may be obtained through the following contacts: (585) 288-1700, [myRTS.com/TitleVI](http://myRTS.com/TitleVI), or [myRTS.com/contact-us](http://myRTS.com/contact-us).

In addition to the Title VI process at RGRTA, Title VI complaints may be filed with the Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

**Título VI Aviso al Público de la Ley de Derechos**

RGRTA como recipiente de fondos federales da aviso al público sobre su política para asegurar la conformidad de Título VI de la Ley de Derechos Civiles de 1964 y cada ley o estatuto relacionado. Ninguna persona en los Estados Unidos por causa de su raza, color, o origen nacional sea excluida de participar en, ser negada los beneficios de, o ser de otra manera sujeta a la discriminación bajo cualquier programa o actividad que recibe asistencia financiera federal conforme a lo dispuesto por el Título VI de la Ley de Derechos Civiles de 1964 con todas sus modificaciones.

RGRTA conduce sus programas sin considerar raza, color, ni origen nacional. Cada persona que crea haber sido individualmente, o por ser miembro de una clase específica de personas, sea excluida de participar en, ser negada los beneficios de, o ser de otra manera sujeta a la discriminación bajo cualquier servicio de RGRTA, programa o actividad, y crea que la discriminación está basada en raza, color o origen nacional, tiene el derecho de hacer una queja de protección Título VI con RGRTA. Cada queja debe ser escrita y presentada al Departamento Legal de RGRTA dentro de 180 días desde el día del acto discriminatorio supuesto o incidente como sigue. Se encuentra las aplicaciones por los contactos abajo: (585) 288-1700, [myRTS.com/TitleVI](http://myRTS.com/TitleVI), o [myRTS.com/contact-us](http://myRTS.com/contact-us). Además del proceso Título VI por RGRTA, se puede enviar quejas con la administración de tránsito federal por correo directamente a: FTA, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

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**RTS opera sus programas y servicios sin distinción de raza, color y origen nacional, de conformidad con el Título VI del Acta de Derechos Civiles. Para obtener más información visite [www.myRTS.com/TitleVI](http://www.myRTS.com/TitleVI).**



(5) Notice available on <https://www.myrts.com/TitleVI> with a link for Spanish. If a person clicks “En Español” a large print translated document in Spanish is available for download/display.

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#### Public Information Concerning Title VI of the Civil Rights Act of 1964, as Amended

RGRTA, as a recipient of federal funding, gives public notice of its policy to fully comply with Title VI of the Civil Rights Act of 1964 and all related laws and statutes.

No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any RTS program or activity, as provided by Title VI of the Civil Rights Act of 1964 and as amended.

RGRTA operates its programs without regard to race, color, or national origin.

Any person who believes that he or she has individually, or as a member of any specific class of persons, been excluded from participation in, been denied the benefits of, or otherwise subjected to discrimination under any RGRTA service, program, or activity, and believes the discrimination is based upon race, color, or national origin has the right to file a Title VI complaint with RGRTA.

All complaints must be filed in writing with the RGRTA Legal Department within 180 days of the alleged discriminatory act or occurrence. Complaint forms may be obtained through the following contacts:

- (585) 288-1700
- [myRTS.com/contact-us](https://www.myrts.com/contact-us)

In addition to the Title VI process at RGRTA, Title VI complaints may be filed with the Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

En Español.

Aviso para el público sobre los derechos de conformidad con el Título VI

RGRTA, como receptor de fondos federales, da aviso público de su política de cumplir plenamente con el Título VI de la Ley de Derechos Civiles de 1964 y todas las leyes y estatutos relacionados.

Según lo dispuesto por el Título VI de la Ley de Derechos Civiles de 1964 y sus enmiendas, ninguna persona en los Estados Unidos será excluida de participar en ningún programa o actividad de RTS por motivos de raza, color u origen nacional, ni se le negarán los beneficios de dichos programas y actividades, así como tampoco será sometida a discriminación en ninguno de los mencionados.

RGRTA opera sus programas sin distinción de raza, color u origen nacional.

Cualquier persona que crea haber sido, individualmente o como miembro de cualquier grupo específico de personas, excluida de participar en cualquier servicio, programa o actividad de RGRTA, o que le hayan sido negado los beneficios de dichos servicios, programas o actividades o que, de otra manera haya sido sujeto de discriminación en relación con cualesquiera de estos, y además cree que la discriminación se basa en la raza, el color o el origen nacional tiene el derecho de presentar una queja de conformidad con el Título VI ante RGRTA.

Todas las quejas deben presentarse por escrito ante el Departamento de Asuntos Legales de RGRTA dentro de los

180 días posteriores al supuesto acto u ocurrencia discriminatorios. Los formularios de queja se pueden obtener a través de los siguientes contactos:

- (585) 288-1700
- [myRTS.com/TitleVI](https://www.myrts.com/TitleVI)
- [myRTS.com/contact-us](https://www.myrts.com/contact-us)

Además del proceso respecto del Título VI en RGRTA, las quejas relacionadas con el Título VI se pueden presentar ante la Oficina de Derechos Civiles de la Administración Federal de Tránsito (Federal Transit Administration, Office of Civil Rights), 1200 New Jersey Avenue SE, Washington, DC 20590.

(6) Samples of bilingual notices branded for each subsidiary. Every subsidiary is reminded periodically to ensure the flyer is posted in customer-facing areas in their offices. The regional subsidiaries are RTS Genesee, Livingston, Ontario, Orleans, Seneca, Wayne, and Wyoming.

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### Notice to the Public of Rights Under Title VI

RGRTA, as a recipient of federal funding, gives public notice of its policy to fully comply with Title VI of the Civil Rights Act of 1964 and all related laws and statutes.

No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any RTS program or activity, as provided by Title VI of the Civil Rights Act of 1964 and as amended.

RGRTA operates its programs without regard to race, color, or national origin.

Any person who believes that he or she has individually, or as a member of any specific class of persons, been excluded from participation in, been denied the benefits of, or otherwise subjected to discrimination under any RGRTA service, program, or activity, and believes the discrimination is based upon race, color, or national origin has the right to file a Title VI complaint with RGRTA.

All complaints must be filed in writing with the RGRTA Legal Department within 180 days of the alleged discriminatory act or occurrence. Complaint forms may be obtained through the following contacts:

- (585) 288-1700
- [myRTS.com/rtbvi](mailto:myRTS.com/rtbvi)
- [myRTS.com/contact-us](mailto:myRTS.com/contact-us)

In addition to the Title VI process at RGRTA, Title VI complaints may be filed with the Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.



### Titulo VI Aviso al Público de la Ley de Derechos

RGRTA como receptante de fondos federales da aviso al público sobre su política para asegurar la conformidad de Título VI de la Ley de Derechos Civiles de 1964 y cada ley o estatuto relacionado.

Ninguna persona en los Estados Unidos por causa de su raza, color, o origen nacional sea excluida de participar en, se deniegue los beneficios de, o sea de otra manera sujeta a la discriminación bajo cualquier programa o actividad que reciba asistencia financiera federal conforme a lo dispuesto por el Título VI de la Ley de Derechos Civiles de 1964 con todas sus modificaciones.

RGRTA conduce sus programas sin considerar raza, color, ni origen nacional.

Cada persona que crea haber sido individualmente, o por ser miembro de una clase específica de personas, sea excluida de participar en, se negada los beneficios de, o sea de otra manera sujeta a la discriminación bajo cualquier programa o actividad, y crea que la discriminación está basada en raza, color o origen nacional, tiene el derecho de hacer una queja de protección Título VI con RGRTA.

Cada queja debe ser escrita y presentada al Departamento Legal de RGRTA dentro de 180 días desde el día del acto discriminatorio, supuesto o incidente como sigue. Se encuentra las aplicaciones por los contactos abajo.

- (585) 288-1700
- [myRTS.com/rtbvi](mailto:myRTS.com/rtbvi)
- [myRTS.com/contact-us](mailto:myRTS.com/contact-us)

Además del proceso Título VI por RGRTA, se puede enviar quejas con la administración de tránsito federal por correo directamente a: Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.



### Notice to the Public of Rights Under Title VI

RGRTA, as a recipient of federal funding, gives public notice of its policy to fully comply with Title VI of the Civil Rights Act of 1964 and all related laws and statutes.

No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any RTS program or activity, as provided by Title VI of the Civil Rights Act of 1964 and as amended.

RGRTA operates its programs without regard to race, color, or national origin.

Any person who believes that he or she has individually, or as a member of any specific class of persons, been excluded from participation in, been denied the benefits of, or otherwise subjected to discrimination under any RGRTA service, program, or activity, and believes the discrimination is based upon race, color, or national origin has the right to file a Title VI complaint with RGRTA.

All complaints must be filed in writing with the RGRTA Legal Department within 180 days of the alleged discriminatory act or occurrence. Complaint forms may be obtained through the following contacts:

- (585) 288-1700
- [myRTS.com/rtbvi](mailto:myRTS.com/rtbvi)
- [myRTS.com/contact-us](mailto:myRTS.com/contact-us)

In addition to the Title VI process at RGRTA, Title VI complaints may be filed with the Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.



### Titulo VI Aviso al Público de la Ley de Derechos

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Ninguna persona en los Estados Unidos por causa de su raza, color, o origen nacional sea excluida de participar en, se deniegue los beneficios de, o sea de otra manera sujeta a la discriminación bajo cualquier programa o actividad que reciba asistencia financiera federal conforme a lo dispuesto por el Título VI de la Ley de Derechos Civiles de 1964 con todas sus modificaciones.

RGRTA conduce sus programas sin considerar raza, color, ni origen nacional.

Cada persona que crea haber sido individualmente, o por ser miembro de una clase específica de personas, sea excluida de participar en, se negada los beneficios de, o sea de otra manera sujeta a la discriminación bajo cualquier programa o actividad, y crea que la discriminación está basada en raza, color o origen nacional, tiene el derecho de hacer una queja de protección Título VI con RGRTA.

Cada queja debe ser escrita y presentada al Departamento Legal de RGRTA dentro de 180 días desde el día del acto discriminatorio, supuesto o incidente como sigue. Se encuentra las aplicaciones por los contactos abajo.

- (585) 288-1700
- [myRTS.com/rtbvi](mailto:myRTS.com/rtbvi)
- [myRTS.com/contact-us](mailto:myRTS.com/contact-us)

Además del proceso Título VI por RGRTA, se puede enviar quejas con la administración de tránsito federal por correo directamente a: Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.



## EXHIBITS

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# Exhibit 05: Title VI Complaints, Forms, and Procedures

## Exhibit 05 Complaint Procedures, Summaries, & Forms Table of Contents

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## TITLE VI COMPLAINTS PROCEDURE

Version: 2

Next Review: 10/01/2021

Effective: 10/01/2020

Approved by: Dan DeLaus (Chief Legal Counsel)

Owner: Policies, Procedures,  
Technical Documents Manager

Printed or downloaded copies are for reference only. Find the most current version in the policy management system (PPM). Go to the intraweb and click Policies and Procedures.

### 1.0. Title VI Complaints

Any person or entity may make a complaint for discrimination based on race, color, or national origin, by filing a complaint in writing within 180 days of the alleged discriminatory act.

All complaints must be made in writing on a copy of the RGRTA Title VI Complaint Form, or as a typed or handwritten letter, or as a typed transcribed summary.

A copy of the RGRTA Title VI Complaint Form may be obtained as follows:

- Download it from the Authority website.
- Send a request for it through the online Contact Us interface.
- Call (585) 288-1700 and ask Customer Service to send it to the appropriate email or mailing address.

A typed or handwritten complaint letter must include:

1. Name, address, and telephone number of complaining party; and
2. Name, address of the person or agency alleged to have engaged in a discriminatory act; and
3. A description on how, why and when the discrimination occurred, including as much background as possible about the allegations; and
4. The signature of the complaining party.

A complainant can call Customer Service during business hours and ask to speak with the Manager of Loss Prevention in order to make a Title VI complaint. The complainant will be informed that the conversation will be recorded. The Manager of Loss Prevention will make use of a recorded telephone line for the purpose of accuracy. The complainant will provide the allegations over the telephone and the Manager of Loss Prevention will write out the allegations. The Manager of Loss Prevention will take notes to obtain:

1. The name, address, and telephone number of complaining party; and
2. The name, address of the person or agency alleged to have engaged in a discriminatory act; and
3. A description on how, why and when the discrimination occurred, including as much background as possible about the allegations.

The Manager of Loss Prevention may use the notes to fill out a copy of the RGRTA Title VI Complaint form or use the notes to create a typed transcribed summary letter. The Manager of Loss Prevention will send the completed form or summary to the complainant. The complainant must review the form/summary for accuracy, provide his/her signature, and file the written complaint. A complainant's failure to sign the written Title VI Complaint and file the Title VI Complaint will result in the administrative closure of the complaint.

#### 1.1. Limited English Proficiency (LEP) Assistance

The RGRTA Title VI Complaint Form is available in Spanish and can be downloaded from the Authority website. Complainants can call (585) 288-1700 to request a form translated into another language.

RGRTA provides free Language Line Personal Interpreter Services to allow LEP complainants to communicate with a Customer Service Representative or the Manager of Loss Prevention during business hours.

Complainants can call (585) 288-1700 to request translation. The translator will convey information between the complainant and the Customer Service Representative and/or the Manager of Loss Prevention.

#### 1.2. Disability-related Assistance

RGRTA will work with persons with disabilities to provide appropriate assistance. For example, the complaint may be filed on a computer disk, by audio tape, or in Braille. If complaints are filed in formats such as audio tape or computer disk, the complainant must sign a transcribed summary before Legal Affairs can proceed with the investigation. If the complainant is unable to write and cannot have someone write out the complaint or cannot tape it, the Manager of Loss Prevention or designee may need to write out the allegations provided over the telephone by the complainant and send the complaint to him or her for signature.

The Manager of Loss Prevention may make use of a recorded telephone line for the purpose of accuracy; in such instances, the complainant will be informed that the conversation will be recorded. Legal Affairs will ask



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the complainant in what format he/she would like the material sent; generally, the material will be sent in the same format it was received. The complainant must review the form/summary for accuracy, provide his/her signature, and file the written complaint.

### 2.0. Filing the Written Title VI Complaint

Complainants can file their written and signed Title VI Complaints through USPS mail, electronically through the Authority website, or in person.

USPS Mail	Electronically Through the Website	In Person
RGRTA Legal Affairs 1372 East Main Street Rochester NY 14609	<ol style="list-style-type: none"> <li>1. Scan the written, signed complaint.</li> <li>2. Save the file in PDF format.</li> <li>3. Go to <a href="http://www.myrts.com/Contact-Us">http://www.myrts.com/Contact-Us</a>.</li> <li>4. Complete the online form.</li> <li>5. Click "Submit with Attachment"</li> <li>6. Upload the PDF file of the complaint.</li> <li>7. Click "Save/Close."</li> </ol>	During business hours, a person can deliver the written, signed complaint to a Customer Service Representative at the front desk in the lobby of 1372 East Main Street, Rochester NY 14609 or at the Customer Information Desk at the RTS Transit Center at 60 St. Paul Street, Rochester NY 14604.

A person can also file a Title VI Complaint directly with the Federal Transit Administration, at the FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

Should a complaint be filed with RGRTA and an external entity simultaneously, the external complaint will supersede the RGRTA complaint and RGRTA's complaint procedures will be suspended pending the external entity's findings.

### 3.0. How RGRTA Will Respond When a Written Title VI Complaint is Filed with RGRTA

RGRTA will investigate any written Title VI Complaint filed within 180 days of the alleged discriminatory act alleging discrimination because of race, color, or national origin. If a complaint is not brought in this period or does not allege discrimination based on race, color, or national origin, RGRTA will advise the complaining party that the Authority will close the complaint.

Once RGRTA Legal Affairs receives a written, signed Title VI Complaint, the Manager of Loss Prevention will review the complaint and, within 15 working days, send a letter to the complainant. The letter will acknowledge the complaint and either commence an investigation or close the matter.

RGRTA will make every effort to investigate a complaint within 60 days. If a specific investigation requires more time, the Manager of Loss Prevention or designee will provide a revised timeframe in subsequent correspondence with the complainant.

In investigating or attempting to resolve the complaint, the Manager of Loss Prevention or another designee in Legal Affairs may contact the complainant for a meeting, interview, or additional information. The Manager of Loss Prevention or designee will work with the complainant to obtain necessary details using the method that is most appropriate for the complainant (i.e. phone, email, written letter, etc.).

A complainant's failure to provide the requested information or participate in a meeting or interview (or failure to provide contact information) will result in the administrative closure of the complaint.

The complainant has 10 business days from the date of any request by the Manager of Loss Prevention to provide the requested information or to participate in the investigation. If the requested information is not received within that period, the complaint will be closed.

After the investigation is completed, the Manager of Loss Prevention will issue a written report summarizing the investigation and will make findings and recommendations for corrective action, if any and as appropriate. Issuance of this report will also close the complaint and investigation.



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### 4.0. How a Complainant May Appeal the Determination

Anyone wishing to appeal the findings, conclusions, or recommendations in the Manager of Loss Prevention's report may do so by submitting a letter setting forth the reasons why the determination is invalid or improper and requesting an independent review by the RGRТА Chief Executive Officer or designee within 15 days of receipt of the report. The CEO will issue a letter either confirming the Manager of Loss Prevention's findings or notifying the complainant of further investigation within 30 business days of receipt of the appeal. The CEO's review is final and binding.

### 5.0. Records, Non-Retaliation, and the Freedom of Information Act

Records of all written, signed, and complete Title VI Complaints and associated investigations are retained by RGRТА's Legal Affairs Department, subject to applicable retention policies and public disclosure requirements and/or exemptions. RGRТА will submit records of written, signed, and complete Title VI Complaints and associated investigations every three years to the Federal Transportation Administration to review as part of RGRТА's Title VI Program Plan. The List of Transit-Related Title VI Complaints, Investigations, & Lawsuits is available as a template form to fill in with the pertinent information as necessary throughout 2017-2020.

No person or entity will suffer retaliation or reprisal by RGRТА as a result of filing a Title VI discrimination Complaint or as a result of participating in an investigation of a complaint. Any person who believes that they have suffered retaliation as a result of making a Title VI Complaint or participating in any such investigation may make a complaint in accordance with this process.

Under the Freedom of Information Act, it may be necessary to release a written Title VI Complaint and related correspondence and records upon request. In the event of such a request, RGRТА will seek to protect—to the extent provided by law—personal information, which if released, could constitute an unwarranted invasion of privacy.

### 6.0. Excluded Items

RGRТА does not consider any of the following items to be Title VI Complaints, unless the item contains a signed cover letter specifically asking that RGRТА take action concerning the allegations:

- Anonymous complaints; or
- Oral complaints; or
- Newspaper articles; or
- Inquiries seeking advice or information; or
- Courtesy copies of court pleadings; or
- Courtesy copies of internal grievances; or
- Courtesy copies of complaints addressed to other local, State, or Federal agencies.

RGRТА will not proceed with or continue a complaint investigation and attempts at resolution of an allegation under the following circumstances:

1. The complaint is so insubstantial or replete with incoherent statements that it cannot be considered factual.
2. The complaint is a continuation of a pattern of previously filed complaints involving the same or similar allegations against the same recipient or other recipients repeatedly found factually or legally insubstantial.
3. The same allegations and issues of the complaint have been addressed in a recently closed complaint or compliance review.
4. The information from the complainant lacks sufficient detail to proceed with complaint resolution.
5. The ability to complete the investigation is substantially impaired by the complainant's or injured party's refusal to cooperate.
6. The death of the complainant or injured party makes it impossible to investigate the allegations fully, or forecloses the possibility of relief.
7. A complaint involving a priority issue, because of its scope, may require a massive amount of investigative resources. RGRТА may consider treating such a complaint as a compliance review.



## TITLE VI COMPLAINTS PROCEDURE

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8. RGRTA determines that a compliance review is the most effective means of addressing multiple individual complaints against RGRTA or its subsidiaries.
9. The complaint allegations are foreclosed by previous decisions by Federal courts, the Department of Justice, or RGRTA policy determinations.
10. Litigation has been filed raising the same allegations. Such cases may be refiled within 60 days following termination of the proceeding if there has been no decision on the merits or settlement of the complaint allegations.
11. The same complaint allegations have been filed with another Federal, State, or local agency, or through a RGRTA's internal grievance procedures, including due process proceedings, and RGRTA is likely to provide the complainant with a comparable resolution process. The complainant should re-file within 60 days of the completion of the other agency's action.
12. RGRTA obtains information that the complaint allegation is moot and there are no class allegations.

### 7.0. Internal Directives and Guidance

#### 7.1. Customer Relationship Management

A member of the public can provide feedback to RGRTA in person, by phone, through an online form on the Website, or through social media. The RTS Customer Service Representative (CSR) creates a case entry in the Customer Relationship Management system. The case entry will include Name, Contact Information, Date/Time of the Incident, Location of the Incident, Service Area, Badge Number of the Bus Operator, Case Origin (Phone, Voicemail, or Web), Route Number, and Description.

If the description includes a complaint related to race, color, or national origin, the CSR will escalate the case to Legal Affairs. The Manager of Loss Prevention will review the case entry, extract the necessary information, and close the case in the Customer Relationship Management system. The Manager of Loss Prevention will contact the complainant and administer civil rights protocols as appropriate, such as informing the complainant about the means of writing a Title VI Complaint and the methods of filing a written Title VI Complaint.

#### 7.2. Title VI Complaint Investigation and Resolution Process

Legal Affairs evaluates Title VI Complaints received no more than 180 days after the alleged incident. The Manager of Loss Prevention or designee will investigate complaints of being excluded from participation in, or denied the benefits of, RGRTA transit services on the basis of race, color or national origin, as protected by Title VI of the Civil Rights Act of 1964, when such complaints are complete (i.e. provide necessary information and signature). A complete Title VI Complaint includes the following information:

1. A signed, written explanation of what has happened; and
2. A way to contact the complainant; and
3. The basis of the complaint, i.e., identification of the person or group, including the race, sex, or other appropriate identification, injured by the alleged discrimination; and
4. Identification of the person or agency alleged to have discriminated; and
5. Sufficient information to understand the facts that led the complainant to believe that discrimination has occurred and when the discrimination took place; and
6. Any information related to transit service in connection with the alleged incident, such as the route traveled, the direction traveled, time of day, date, location, bus stop ID number, and bus number.

The Manager of Loss Prevention or designee will perform the investigation, which will involve these steps:

- a. Identify the specific practice or service involved in the alleged discrimination.
- b. Collect evidence in an investigation file.
- c. Prepare, finalize, and send the report.





## TITLE VI COMPLAINTS PROCEDURE

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Effective: 10/01/2020

Approved by: Dan DeLaus (Chief Legal Counsel)

### A. Identify the Specific Practice or Service Involved in the Alleged Discrimination

The Manager of Loss Prevention or designee will identify the specific practice or service involved in the alleged discrimination. Even if discriminatory intent cannot be ascertained, identify the practice, procedure, policy, or service that is alleged to have a disparate effect on one or more members of a certain protected class.

Generally, during the investigation, the Manager of Loss Prevention or designee is looking for allegations of one or more of the following on a covered basis:

- 1) Any difference in the quality, quantity, or manner in which a service or benefit is provided; or
- 2) Segregation in any part of a program or separate treatment in any manner; or
- 3) Restriction in the enjoyment of any advantages, privileges, or other benefits that are provided by the program; or
- 4) Different standards or requirements for participation or entry; or
- 5) Separate treatment in any manner related to receipt of services or benefits; or
- 6) Failure to provide information or services in languages other than English where a significant number or proportion of potential beneficiaries are of limited English-speaking ability; or
- 7) Failure to adequately advise person(s) in the eligible population of the existence of services or benefits; or
- 8) Use of criteria or methods of administration that would defeat or substantially impair the accomplishment of program objectives or would affect members of a protected group disproportionately.

### B. Collect Evidence in an Investigation File

The Manager of Loss Prevention or designee will collect reliable, relevant, material evidence with regard to disparate treatment and disparate impact and retain the material in an investigation file. The investigation activities may involve interviews, review of video recorded by cameras on buses or in the Transit Center, and review of any relevant documents.

### C. Prepare, Finalize, and Send the Report

The Manager of Loss Prevention or designee will prepare an investigative report to present the facts collected during the investigation, identify the supporting material, identify the allegations, and present an analysis of the relevance of the facts to the allegations. The Manager of Loss Prevention or designee will submit the investigative report to the General Counsel. The General Counsel will determine whether there is evidence of a Title VI violation or a finding of discrimination under Title VI based on the analysis, and recommend corrective and/or remedial action as appropriate. The Manager of Loss Prevention or designee will include the determination and recommendations in the report, send the report to the complainant, and close the complaint.

### 7.3. Other Personnel and Resources

While Legal Affairs holds primary responsibility for investigating a Title VI Complaint, the process may involve personnel from the RGRTA Executive Management staff, Human Resources staff, Operations staff, and Legal Affairs staff. Legal Affairs may use the following resources while investigating a Title VI Complaint.

- a. External General Counsel (Susan Lent, [slent@akingump.com](mailto:slent@akingump.com))
- b. <https://www.dot.ny.gov/divisions/policy-and-strategy/public-transportation/civilrights/title-vi>
- c. FTA Civil Rights & Accessibility  
(<http://ftawebprod.fta.dot.gov/ContactUsTool/Public/NewRequest.aspx>)
- d. Title VI Regulations 49 CFR Part 21
- e. Title VI Circular FTA C 4702.1B

## Summary of Title VI Notice and Complaint Process

**Public Notice of RGRTA's Compliance with Title VI of the Civil Rights Act of 1964 and all Related Laws and Statutes**

No person shall be excluded from participation in, or denied the benefits of, RGRTA transit services based on race, color, or national origin as protected by Title VI. For information about our Title VI practices, visit [www.myRTS.com/TitleVI](http://www.myRTS.com/TitleVI) or call (585) 288-1700. If you believe you have experienced any unlawful discrimination under Title VI while using our public transportation service, you have the right to file a written Title VI Complaint with the RGRTA Legal Department or the Federal Transit Administration Office of Civil Rights.

**Filing a Title VI Complaint with the RGRTA Legal Department**

Title VI Complaints must be in writing, signed, and filed with the RGRTA Legal Department within 180 days of the incident. Legal will accept signed, completed RGRTA Title VI Complaint Forms, signed letters, or signed transcribed summaries. For a copy of the RGRTA Title VI Complaint Form, you may:

- Download it from [www.myRTS.com/TitleVI](http://www.myRTS.com/TitleVI).
- Send a request for the form through the online "Contact Us" interface.
- Call (585) 288-1700 and ask Customer Service to send it to your email or mailing address.

A typed or handwritten complaint letter must include:

- Your name, address, and phone number;
- Name and address of the person alleged to have engaged in a discriminatory act; and
- A description, including as much background as possible about the allegations; and
- Your signature.

**What If I Am Unable to Write a Title VI Complaint?**

- Call (585) 288-1700 during business hours.
- If you need to communicate in another language, ask for a Language Line interpreter.
- Say that you want to make a Title VI Complaint verbally and need to be transferred to the Legal Department.
- If you reach voicemail, please say your name, phone number, and that you want to make a Title VI Complaint.
- Please notify Legal if you have a disability and require a specific format to file your Title VI Complaint.
- Legal will speak with you, record information, and provide a completed Title VI Complaint form or a transcribed summary for your review and signature.
- You are responsible for filing your signed complaint with the RGRTA Legal Department within 180 days of the incident.

**How Do I File the Title VI Complaint with RGRTA?**

You can file your Title VI Complaints through the mail, electronically through the RTS website, or in person.

USPS Mail	Electronically Through the Website	In Person During Business Hours
RGRTA Legal Affairs 1372 East Main Street Rochester NY 14609	<ul style="list-style-type: none"> <li>• Scan the written, signed complaint.</li> <li>• Save the file in PDF format.</li> <li>• Go to <a href="http://www.myrts.com/Contact-Us">http://www.myrts.com/Contact-Us</a>.</li> <li>• Complete the online form.</li> <li>• Click "Submit with Attachment"</li> <li>• Upload the PDF file of the complaint.</li> <li>• Click "Save/Close."</li> </ul>	Deliver your written, signed complaint to <ul style="list-style-type: none"> <li>• Lobby Front Desk at 1372 East Main Street, Rochester NY 14609</li> </ul> OR <ul style="list-style-type: none"> <li>• Customer Information Desk at the RTS Transit Center at 60 St. Paul Street, Rochester NY 14604</li> </ul>

**How Will RGRTA Handle a Title VI Complaint?**

Legal will review any written, signed Title VI Complaint received through the filing process. In 15 business days, we will notify you whether we are starting an investigation or closing the matter.

If we are investigating the Title VI Complaint, we will aim to do so within 60 days. We will notify you if we require more time. We may contact you for information and will seek to use the most appropriate method of communication (phone, email, written letter, or meeting).

### Summary of Title VI Notice and Complaint Process

You will have 10 business days from the date of our request to provide the information. If we do not receive it within that period, we will close your complaint and notify you about the closure through a letter.

Following the investigation, we will issue a written report to you containing any findings and appropriate recommendations. Issuance of the report will close the complaint and investigation.

### What if I Disagree with the Report?

You may appeal the findings, conclusions, or recommendations of the report within 15 days of receipt of the report. Send your appeal letter to RGRTA Chief Executive Officer at 1372 East Main Street, Rochester NY. Your letter must request an independent review of your Title VI Complaint by the CEO and describe the reasons why you believe the original determination to be invalid or improper.

Within 30 days of receiving your appeal, the CEO will issue a letter either confirming the findings or notifying you of further investigation. The CEO's review is final and binding.

### Records, Non-Retaliation, and the Freedom of Information Act

Records of all written, signed, and complete Title VI Complaints and associated investigations will be retained by RGRTA's Legal Department, subject to applicable retention policies and public disclosure requirements and/or exemptions. We will submit records of written, signed, and complete Title VI Complaints and associated investigations every three years to the Federal Transportation Administration to review as part of RGRTA's Title VI Program Plan. No one will suffer retaliation or reprisal by RGRTA for filing a Title VI Complaint or for participating in the investigation of Title VI Complaint. Any person who believes that they suffered retaliation for making a Title VI Complaint or participating in any such investigation may make a complaint in accordance with this process.

Under the Freedom of Information Act, it may be necessary to release a written Title VI Complaint, related correspondence, and records upon request. In the event of such a request, RGRTA will seek to protect—to the extent provided by law—personal information, which if released, could constitute an unwarranted invasion of privacy.

### Excluded Items

RGRTA does not consider any of the following items to be Title VI Complaints, unless the item contains a signed cover letter specifically asking that RGRTA take action concerning the allegations:

- Anonymous complaints; or
- Oral complaints; or
- Newspaper articles; or
- Inquiries seeking advice or information; or
- Courtesy copies of court pleadings, internal grievances, or complaints addressed to other local, State, or Federal agencies.

RGRTA will not proceed with or continue a Title VI Complaint investigation under the following circumstances:

- The complaint is so insubstantial or replete with incoherent statements that it cannot be considered factual.
- The complaint is a continuation of a pattern of previously filed complaints involving the same or similar allegations against the same recipient or other recipients repeatedly found factually or legally insubstantial.
- The same allegations and issues of the complaint have been addressed in a recently closed complaint or compliance review.
- The information from the complainant lacks sufficient detail to proceed with complaint resolution.
- The ability to complete the investigation is substantially impaired by the complainant's refusal to cooperate.
- The death of the complainant makes it impossible to investigate the allegations fully.
- A complaint involving a priority issue, because of its scope, may require a massive amount of investigative resources. RGRTA may consider treating such a complaint as a compliance review.
- RGRTA determines that a compliance review is the most effective means of addressing multiple individual complaints against RGRTA or its subsidiaries.
- The complaint allegations are foreclosed by previous decisions by Federal courts, the Department of Justice, or RGRTA policy determinations.
- Litigation has been filed raising the same allegations. Such cases may be refiled within 60 days following termination of the proceeding if there has been no decision on the merits or settlement of the complaint allegations.

**Summary of Title VI Notice and Complaint Process**

- The same complaint allegations have been filed with another Federal, State, or local agency, or through a RGRTA's internal grievance procedures, including due process proceedings, and RGRTA is likely to provide the complainant with a comparable resolution process. The complainant should re-file within 60 days of the completion of the other agency's action.
- RGRTA obtains information that the complaint allegation is moot and there are no class allegations.

**Filing a Title VI Complaint with the FTA**

In addition to the Title VI process at RGRTA, Title VI Complaints may be filed with the Federal Transit Administration, Office of Civil Rights at 1200 New Jersey Avenue SE, Washington, DC 20590.

## Summary of Title VI Notice and Complaint Process

RGRTA will not proceed with or continue a complaint investigation and attempts at resolution of an allegation under the following circumstances:

1. The complaint is so insubstantial or replete with incoherent statements that it cannot be considered factual.
2. The complaint is a continuation of a pattern of previously filed complaints involving the same or similar allegations against the same recipient or other recipients repeatedly found factually or legally insubstantial.
  1. The same allegations and issues of the complaint have been addressed in a recently closed complaint or compliance review.
  2. The information from the complainant lacks sufficient detail to proceed with complaint resolution.
  3. The ability to complete the investigation is substantially impaired by the complainant's or injured party's refusal to cooperate.
  4. The death of the complainant or injured party makes it impossible to investigate the allegations fully, or forecloses the possibility of relief.
  5. A complaint involving a priority issue, because of its scope, may require a massive amount of investigative resources. RGRTA may consider treating such a complaint as a compliance review.
  6. RGRTA determines that a compliance review is the most effective means of addressing multiple individual complaints against RGRTA or its subsidiaries.
  7. The complaint allegations are foreclosed by previous decisions by Federal courts, the Department of Justice, or RGRTA policy determinations.
  8. Litigation has been filed raising the same allegations. Such cases may be refiled within 60 days following termination of the proceeding if there has been no decision on the merits or settlement of the complaint allegations.
  9. The same complaint allegations have been filed with another Federal, State, or local agency, or through a RGRTA's internal grievance procedures, including due process proceedings, and RGRTA is likely to provide the complainant with a comparable resolution process. The complainant should re-file within 60 days of the completion of the other agency's action.
10. RGRTA obtains information that the complaint allegation is moot and there are no class allegations.

## Resumen de aviso y proceso de queja sobre el Título VI

### **Aviso público del cumplimiento de RGRTA con el Título VI de la Ley de Derechos Civiles de 1964 y todas las leyes y estatutos relacionados**

Ninguna persona podrá ser excluida de la participación ni se le podrán denegar los beneficios de los servicios de transporte público de RGRTA en función de su raza, color u origen nacional, en virtud de las protecciones estipuladas en el Título VI. Para obtener información sobre nuestras prácticas relacionadas con el Título VI, visite <https://www.myrts.com/titleVI> o llame al (585) 288-1700. Si cree que ha sido víctima de una discriminación ilegal en virtud del Título VI al utilizar nuestro servicio de transporte público, tiene derecho a presentar una queja por escrito respecto del Título VI ante el Departamento de Asuntos Legales de RGRTA o ante la Oficina de Derechos Civiles de la Administración Federal de Transporte.

### **Cómo presentar una queja respecto del Título VI ante el Departamento de Asuntos Legales de RGRTA**

Las quejas respecto del Título VI deben presentarse por escrito y firmadas ante el Departamento de Asuntos Legales de RGRTA dentro de los 180 días posteriores al incidente. Asuntos Legales aceptará formularios de queja de RGRTA respecto del Título VI firmados y completos, cartas firmadas o resúmenes transcritos firmados. Para obtener una copia del formulario de queja de RGRTA respecto del Título VI, puede:



## Resumen de aviso y proceso de queja sobre el Título VI

- Descargarlo de <https://www.myrts.com/titleVI>.
- Enviar un pedido del formulario a través de la interfaz en línea "[Contact Us](#)" ([Contáctenos](#)).
- Llamar al (585) 288-1700 y solicitar al Servicio al cliente que se lo envíe a su correo electrónico o correo postal.

Las cartas de queja, sean manuscritas o impresas, deben incluir lo siguiente:

- Su nombre, dirección y número de teléfono;
- Nombre y dirección de la persona que supuestamente participó en un acto discriminatorio; y
- Una descripción, que incluya la mayor cantidad de detalles posible sobre las denuncias; y
- Su firma.

### **¿Qué sucede si no puedo escribir una queja respecto del Título VI?**

- Llame al (585) 288-1700 durante el horario comercial.
- Si necesita comunicarse en otro idioma, solicite un intérprete de Language Line.
- Diga que desea presentar verbalmente una queja respecto del Título VI y que necesita que se lo/a transfiera con el Departamento de Asuntos Legales.

## Resumen de aviso y proceso de queja sobre el Título VI

- Si se comunica con el correo de voz, indique su nombre, número de teléfono y explique que desea presentar una queja respecto del Título VI.
- Notifique a Asuntos Legales si tiene una discapacidad y requiere un formato específico para presentar su queja respecto del Título VI.
- Asuntos Legales hablará con usted, registrará la información y le proporcionará un formulario de queja respecto del Título VI completo o un resumen transcrito para su revisión y firma.
- Usted es responsable de presentar su queja firmada ante el Departamento de Asuntos Legales de RGRTA dentro de los 180 días posteriores al incidente.

### ¿Cómo presento la queja respecto del Título VI ante RGRTA?

Puede presentar sus quejas respecto del Título VI a través del correo postal, electrónicamente a través del sitio web de RTS o en persona.

Correo USPS	Electrónicamente a través del sitio web	En persona durante el horario comercial
Departamento de Asuntos Legales de RGRTA 1372 East	<ul style="list-style-type: none"> <li>• Escanee la queja escrita y firmada.</li> <li>• Guarde el archivo en formato PDF.</li> <li>• Vaya a <a href="https://rts.secure.force.com/RTSContactUs">https://rts.secure.force.com/RTSContactUs</a>.</li> <li>• Complete el formulario en línea.</li> </ul>	Entregue su queja escrita y firmada en <ul style="list-style-type: none"> <li>• el Mostrador de recepción central, en 1372 East Main</li> </ul>

## Resumen de aviso y proceso de queja sobre el Título VI

Correo USPS	Electrónicamente a través del sitio web	En persona durante el horario comercial
Main Street Rochester, NY 14609	<ul style="list-style-type: none"> <li>Haga clic en "Submit with Attachment" (Enviar con archivo adjunto)</li> <li>Cargue el archivo de la queja en formato PDF.</li> <li>Haga clic en "Save/Close" (Guardar/Cerrar).</li> </ul>	Street, Rochester NY 14609 O en <ul style="list-style-type: none"> <li>el Mostrador del Servicio de información al cliente de RTS Transit Center en 60 St. Paul Street, Rochester NY 14604</li> </ul>

### ¿Cómo maneja RGRTA las quejas respecto del Título VI?

Asuntos Legales revisará todas las quejas escritas y firmadas respecto del Título VI recibidas a través del proceso de presentación. En 15 días hábiles, le notificaremos si iniciaremos una investigación o si cerraremos el caso.

Si decidimos proceder a investigar la queja respecto del Título VI, intentaremos hacerlo en un plazo de 60 días. Le avisaremos si necesitamos más tiempo. Es posible que nos contactemos con usted para obtener información y trataremos

## Resumen de aviso y proceso de queja sobre el Título VI

de utilizar el método de comunicación más apropiado (teléfono, correo electrónico, carta escrita o reunión).

Tendrá 10 días hábiles desde la fecha de nuestra solicitud para proporcionar la información. Si no la recibimos dentro de ese período, cerraremos su queja y le notificaremos sobre el cierre a través de una carta.

Después de la investigación, le enviaremos un informe por escrito con las conclusiones y las recomendaciones correspondientes. La emisión del informe obrará como cierre de la queja y la investigación.

### **¿Qué sucede si no estoy de acuerdo con el informe?**

Puede apelar las conclusiones, las definiciones o las recomendaciones del informe dentro de los 15 días posteriores a la recepción del informe. Envíe su carta de apelación al Director ejecutivo de RGRTA, a 1372 East Main Street, Rochester NY. Su carta debe solicitar una revisión independiente de su queja respecto del Título VI por parte del Director ejecutivo, y debe describir las razones por las que considera que la determinación original no es válida o es improcedente.

Dentro de los 30 días posteriores a la recepción de su apelación, el Director ejecutivo emitirá una carta ya sea confirmando las conclusiones o notificándole sobre una investigación posterior. La revisión del Director ejecutivo es definitiva y vinculante.

## Resumen de aviso y proceso de queja sobre el Título VI

### **Registros, represalias y la Ley de Libertad de Información**

El Departamento de Asuntos Legales de RGRTA retendrá los registros de todas las quejas respecto del Título VI escritas, firmadas y completas, y las investigaciones relacionadas, sujeto a las políticas de retención aplicables y a los requisitos y/o exenciones de divulgación pública. Cada tres años, enviaremos registros de las quejas respecto del Título VI escritas, firmadas y completas y las investigaciones asociadas a la Administración Federal de Transporte para que las revise como parte del Plan de Programa del Título VI de RGRTA.

Nadie sufrirá represalias o castigos por parte de RGRTA por presentar una queja respecto del Título VI o por participar en la investigación de una queja respecto del Título VI. Cualquier persona que crea que sufrió represalias por presentar una queja respecto del Título VI o por participar en una investigación de este tipo puede presentar una queja de conformidad con este proceso.

En virtud de la Ley de Libertad de Información, es posible que sea necesario divulgar una queja escrita respecto del Título VI, correspondencia relacionada y registros a pedido. En el caso de tal solicitud, RGRTA tratará de proteger, en la medida en que lo permita la ley, la información personal que, de ser divulgada, podría constituir una invasión injustificada de la privacidad.

## Resumen de aviso y proceso de queja sobre el Título VI

### **Elementos excluidos**

RGRTA no considera que ninguno de los siguientes elementos constituyan quejas respecto del Título VI, a menos que el elemento contenga una carta de presentación firmada específicamente solicitando que RGRTA tome medidas con respecto a las denuncias:

- Quejas anónimas; o
- Quejas verbales; o
- Artículos en el periódico; o
- Consultas que buscan consejos o información; o
- Copias de cortesía de actuaciones de un tribunal, reclamos internos o quejas dirigidas a otras agencias locales, estatales o federales.

RGRTA no continuará ni procederá con una investigación de quejas respecto del Título VI en las siguientes circunstancias:

- La queja es tan vaga o está tan llena de afirmaciones incoherentes que no puede considerarse objetiva.
- La queja es una continuación de un patrón de quejas presentadas anteriormente que implican las mismas denuncias o alegatos similares contra el mismo destinatario u otros destinatarios, que se determinan repetidamente como insustanciales objetiva o legalmente.



## Resumen de aviso y proceso de queja sobre el Título VI

- Las mismas denuncias y problemas de la queja ya se han abordado en una queja o una revisión de cumplimiento recientemente cerrada.
- La información de quien formula la queja carece de detalles suficientes como para proceder con la resolución de la queja.
- La capacidad de completar la investigación se ve sustancialmente afectada porque quien presenta la queja se rehúsa a cooperar.
- La muerte de la persona que presenta la queja hace que sea imposible investigar las denuncias plenamente.
- Las quejas que, por su alcance, involucren un tema prioritario pueden requerir una gran cantidad de recursos de investigación. RGRTA puede considerar tratar dichas quejas como una revisión de cumplimiento.
- RGRTA determina que una revisión de cumplimiento es el medio más eficaz para abordar múltiples quejas individuales contra RGRTA o sus subsidiarias.
- Las denuncias de las quejas quedan anuladas por decisiones anteriores de los tribunales federales, el Departamento de Justicia o las determinaciones de políticas de RGRTA.
- Se ha presentado un litigio que postulaba las mismas denuncias. Es posible volver a presentar estos casos dentro de los 60 días posteriores a la

## Resumen de aviso y proceso de queja sobre el Título VI

finalización del proceso legal si no se ha tomado una decisión sobre los méritos ni se han resuelto las denuncias de la queja.

- Ya se han presentado las mismas denuncias de la queja ante otra agencia federal, estatal o local, o mediante los procedimientos internos de reclamos de RGRTA, incluidos los procedimientos de debido proceso, y existe la probabilidad de que RGRTA le proporcione a quien presenta la queja un proceso de resolución comparable. La persona que presenta la queja debe volver a presentarla dentro de los 60 días posteriores a la finalización de la acción de la otra agencia.
- Se le informa a RGRTA que la denuncia de la queja es discutible y que hay denuncias grupales.

### **Cómo presentar una queja respecto del Título VI ante la FTA**

Además del proceso del Título VI ante RGRTA, es posible presentar una queja respecto del Título VI ante la Oficina de Derechos Civiles de la Administración Federal de Transporte, en 1200 New Jersey Avenue SE, Washington, DC 20590. RGRTA no continuará ni procederá con la investigación de una queja ni con los intentos por arribar a una resolución de una denuncia en las siguientes circunstancias:

## Resumen de aviso y proceso de queja sobre el Título VI

1. La queja es tan vaga o está tan llena de afirmaciones incoherentes que no puede considerarse objetiva.
2. La queja es una continuación de un patrón de quejas presentadas anteriormente que implican las mismas denuncias o alegatos similares contra el mismo destinatario u otros destinatarios, que se determinan repetidamente como insustanciales objetiva o legalmente.
3. Las mismas denuncias y problemas de la queja ya se han abordado en una queja o una revisión de cumplimiento recientemente cerrada.
4. La información de quien formula la queja carece de detalles suficientes como para proceder con la resolución de la queja.
5. La capacidad de completar la investigación se ve sustancialmente afectada porque quien presenta la queja o la víctima del incidente se rehúsa a cooperar.
6. La muerte de la persona que presentó la queja o de la víctima del incidente hace que sea imposible investigar plenamente las acusaciones, o anula la posibilidad de una compensación.

## Resumen de aviso y proceso de queja sobre el Título VI

7. Las quejas que, por su alcance, involucren un tema prioritario pueden requerir una gran cantidad de recursos de investigación. RGRTA puede considerar tratar dichas quejas como una revisión de cumplimiento.
8. RGRTA determina que una revisión de cumplimiento es el medio más eficaz para abordar múltiples quejas individuales contra RGRTA o sus subsidiarias.
9. Las denuncias de las quejas quedan anuladas por decisiones anteriores de los tribunales federales, el Departamento de Justicia o las determinaciones de políticas de RGRTA.
10. Se ha presentado un litigio que postulaba las mismas denuncias. Es posible volver a presentar estos casos dentro de los 60 días posteriores a la finalización del proceso legal si no se ha tomado una decisión sobre los méritos ni se han resuelto las denuncias de la queja.
11. Ya se han presentado las mismas denuncias de la queja ante otra agencia federal, estatal o local, o mediante los procedimientos internos de reclamos de RGRTA, incluidos los procedimientos de debido proceso, y existe la probabilidad de que RGRTA le proporcione a quien presenta la queja un proceso de resolución comparable. La persona que presenta la

## Resumen de aviso y proceso de queja sobre el Título VI

queja debe volver a presentarla dentro de los 60 días posteriores a la finalización de la acción de la otra agencia.

12. Se le informa a RGRТА que la denuncia de la queja es discutible y que hay denuncias grupales.



## TITLE VI COMPLAINT FORM

**If assistance is needed in another language, please call 585.288.1700.  
Si necesita información en otro idioma, por favor llame al 585-288-1700.**

### Section 1

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone (Home): \_\_\_\_\_ Telephone (Work): \_\_\_\_\_

Electronic Mail Address: \_\_\_\_\_

Accessible Format Requirements? ☐ Large Print ☐ Audio Tape  
☐ TDD ☐ Other \_\_\_\_\_

### Section 2

Are you filing this complaint on your own behalf? ☐ Yes ☐ No

If you answer YES, go to Section 3.

If you answer NO, complete Section 2.

Supply the name of the third party and your relationship to the third party.

Name: \_\_\_\_\_ Relationship: \_\_\_\_\_

Why you are filing a complaint for a third party? \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Did you obtain the permission of the aggrieved party to file on his/her behalf? ☐ Yes ☐ No





I believe the discrimination I experienced was based on (check all that apply): ☐ Race ☐ Color ☐ National Origin

Transit Service (choose one):

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
RTS	RTS Access	RTS Geneseo	RTS Livingston	RTS Ontario	RTS Orleans	RTS Wayne	RTS Wyoming

Direction of Travel: \_\_\_\_\_ Location of Incident: \_\_\_\_\_

[illegible]

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## TITLE VI COMPLAINT FORM

### Section 4

Have you previously filed a Title VI complaint with this agency? ☐ Yes ☐ No

### Section 5

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal agency or State court? ☐ Yes ☐ No

If you answer YES, check all that apply:

☐ Federal Court ☐ State Agency ☐ State Court ☐ Local Agency

Please provide a contact person at the agency/court where the complaint was filed.

Name	Title	Agency
Address: _____		
Telephone: _____		

### Section 6

Name of agency complaint is against: \_\_\_\_\_

Contact person: \_\_\_\_\_

Title: \_\_\_\_\_

Telephone: \_\_\_\_\_

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

### Signature and Date Required Below

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

### File the Title VI Complaint within 180 Days of the Incident

USPS Mail	Electronically Through the Website	In Person During Business Hours
RGRTA Legal Affairs 1372 East Main Street Rochester NY 14609	<ol style="list-style-type: none"> <li>1. Scan the written, signed complaint.</li> <li>2. Save the file in PDF format.</li> <li>3. Go to <a href="http://www.myrts.com/Contact-Us">http://www.myrts.com/Contact-Us</a>.</li> <li>4. Complete the online form.</li> <li>5. Click "Submit with Attachment"</li> <li>6. Upload the PDF file of the complaint.</li> <li>7. Click "Save/Close."</li> </ol>	Deliver your written, signed complaint to:  Lobby Front Desk 1372 East Main Street, Rochester NY 14609 OR Customer Information Desk RTS Transit Center 60 St. Paul Street, Rochester NY 14604



## TÍTULO VI: FORMULARIO DE QUEJAS

Versión: 1  
Fecha de vigencia:  
05/27/2015

Enviar por correo a: RGRTA  
Legal Affairs Department  
1372 East Main Street  
Rochester, NY 14609

**Si necesita ayuda en otro idioma, por favor llame al 585.288.1700.**  
**If assistance is needed in another language, please call 585-288-1700.**

### Sección 1

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

Dirección: \_\_\_\_\_

Teléfono (casa): \_\_\_\_\_ Teléfono (trabajo): \_\_\_\_\_

Dirección de correo electrónico: \_\_\_\_\_

¿Requisitos de formato de acceso? ☐ Letra grande ☐ Cinta de audio  
☐ TDD ☐ Otro \_\_\_\_\_

### Sección 2

¿Está presentando esta queja en su propio nombre? ☐ Sí ☐ No

Si su respuesta es afirmativa, vaya a la Sección 3.

Si su respuesta es negativa, vaya a la Sección 2.

Proporcione el nombre de la tercera parte y su relación con esta.

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

¿Por qué está presentando una queja por una tercera parte? \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

¿Obtuvo usted permiso de la parte agraviada para presentar la queja en su nombre? ☐ Sí ☐ No



1372 East Main Street  
Rochester, NY 14609

Creo que la discriminación que experimenté estuvo basada en (marque todo lo que corresponda):

Fecha de la presunta discriminación (mes, día, año):

- Lo qué sucedió;
- La razón por la que cree que fue discriminado(a); y
- Describa todas las personas que estuvieron involucradas.

[illegible]

- El nombre e información de contacto de la persona (o personas) que lo discriminaron (si lo sabe); y
- Los nombres e información de contacto de los testigos.

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## TÍTULO VI: FORMULARIO DE QUEJAS

Versión: 1  
Fecha de vigencia:  
05/27/2015

Enviar por correo a:

RGRTA  
Legal Affairs Department

1372 East Main Street  
Rochester, NY 14609

### Sección 4

¿Ha presentado usted previamente una queja del Título VI con ☐ Sí ☐ No

### Sección 5

¿Ha presentado esta queja con cualquier otra agencia federal, estatal o local, o con algún tribunal federal o estatal? ☐ Sí ☐ No

Si su respuesta es afirmativa, marque todo lo que corresponda:

☐ Tribunal federal ☐ Agencia estatal ☐ Tribunal estatal ☐ Agencia local

Por favor, proporcione información sobre una persona de contacto en la agencia / tribunal donde se presentó la denuncia.

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

Cargo: \_\_\_\_\_

Agencia: \_\_\_\_\_

Dirección: \_\_\_\_\_

Teléfono: \_\_\_\_\_

### Sección 6

Nombre de la agencia contra la cual se presenta la queja: \_\_\_\_\_

Persona de contacto: \_\_\_\_\_

Cargo: \_\_\_\_\_

Teléfono: \_\_\_\_\_

Puede adjuntar cualquier material escrito u otra información que usted crea que sea relevante para su queja.

### Se debe firmar y fechar a continuación

Firma: \_\_\_\_\_ Fecha: \_\_\_\_\_

Por favor, presente este formulario personalmente en la dirección de abajo, o envíelo por correo a

**RGRTA Legal Affairs Department**  
**1372 East Main Street**  
**Rochester, NY 14609**

## EXHIBITS

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# Exhibit 06: Title VI Investigations



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**LIST OF TRANSIT-RELATED TITLE VI COMPLAINTS, INVESTIGATIONS, & LAWSUITS**

Version: 2

Effective: 10/01/2020

Owner: Policies, Procedures, Technical Documents Manager

*Printed or downloaded copies are for reference only. Find the most current version in the policy management system (PPM). Go to the intraweb and click Policies and Procedures.*

## Purpose

In order to comply with the reporting requirements of 49 CFR Section 21.9(b), RGRTA must prepare and maintain a list of any of the following that allege discrimination based on race, color, or national origin:

1. Complaints naming RGRTA or any of its subsidiaries; and
2. Active investigations conducted by entities other than FTA; and
3. Lawsuits.

For every complaint, investigation, or lawsuit the entry shall include the date it was filed, a summary of the allegation(s), the status, and RGRTA's response or final findings. This list shall be included in the Title VI Program Plan submitted to FTA every three years. This list shall be maintained by the Manager of Loss Prevention, or designee, in accordance with the Title VI Complaints Procedure.

Each entry shall be in chronological order from newest to oldest.

## 2020-2023 Program Period

RGRTA is reporting the following:

- One Title VI Complaint filed directly from a customer naming RTS (fixed route); and
- One Investigation currently in progress by the Division of Human Rights naming RTS Ontario.

**RGRTA LIST OF TRANSIT-RELATED TITLE VI COMPLAINTS, INVESTIGATIONS, & LAWSUITS**

Version: 2

Effective: 10/01/2020

Owner: Policies, Procedures, Technical Documents Manager

Printed or downloaded copies are for reference only. Find the most current version in the policy management system (PPM). Go to the intraweb and click Policies and Procedures.

**1.0. Complaints**

1.1. Incident date 11/04/2020. Complaint date 11/05/2020 and CRM Case Number 0008093 | Bus Operator Earl Roberson and Customer Barrington Price.

Basis	Summary	Status	Response/Final Findings
<div><input checked="" type="checkbox"/> Race</div> <div><input type="checkbox"/> Color</div> <div><input type="checkbox"/> National Origin</div>	<div><u>COMPANY</u></div> <div><input type="checkbox"/> RGRTA <input checked="" type="checkbox"/> RTS <input type="checkbox"/> RTS Access <input type="checkbox"/> RTS Genesee <input type="checkbox"/> RTS Livingston</div> <div><input type="checkbox"/> RTS Ontario <input type="checkbox"/> RTS Orleans <input type="checkbox"/> RTS Wayne <input type="checkbox"/> RTS Wyoming</div> <div><u>LOCATION</u></div> <div>Bus Number: 1409   Route Number: 8 Chili   Block Number: 140</div> <div>RTS Bus Number 1409 servicing Route 8 Chili on Block 140 at Bus Stop# 5739 [Chili Walmart]. Assigned Badge is 3430 [Earl Roberson].</div> <div>RTS Transit Center, 60 St Paul St, Rochester, NY 14604</div> <div><u>ALLEGED DISCRIMINATION</u></div> <div>Complaining party: Barrington Price, an RTS customer.</div> <div>Earl Roberson, an RTS Bus Operator, is alleged to have discriminated.</div> <div>Allegations: Barrington Price stated that he boarded at Chili Walmart and inserted 5 dimes for a senior pass. The coins jammed in the farebox. Barrington Price alleged that Earl Roberson called him a racial slur, used abusive language and expletives, and refused to give him a pass. Bus 1409 transports Barrington Price from the Chili Walmart to the RTS Transit Center. At the RTS Transit Center, Barrington Price speaks with a Supervisor on duty. The Supervisor gave Barrington Price a pass and told him to file a complaint. Barrington Price called Customer Service and verbally relayed his complaint.</div> <div>The potential disparate impact of the alleged discrimination: 1) customer unable to access service due to denial of a pass; and 2) customer deterred from using service due to racist verbal abuse.</div>	<div><input type="checkbox"/> Active</div> <div><input checked="" type="checkbox"/> Closed</div> <div><u>RESPONSE (Timeline of Actions)</u></div> <div>11/05/20 through 03/31/21, the Authority communicates with Barrington Price and conducts the investigation. On 04/01/21, the investigation and complaint were closed.</div> <div><u>FINAL FINDINGS</u></div> <div>Results of investigation did not demonstrate violation of Title VI of Civil Rights Act of 1964.</div> <div>Legal Affairs interviewed Earl Roberson, listened to recorded audio, watched video recorded onboard the bus, and reviewed the findings with Earl Roberson’s manager. Review of the recordings and transcript revealed no evidence of the slur or abusive language. Earl Roberson gave Barrington Price an All-Day Pass, which allowed Barrington Price unlimited trips for the day. Barrington Price received the trip he paid for (\$0.50 one-way trip fare for Senior Citizen) to the RTS Transit Center. Barrington Price was not denied service on the basis of his race, color, or national origin.</div> <div>Legal Affairs concluded that an improvement for both customers and Bus Operators would be to increase the time-out period programmed on the fareboxes. This complaint did not result in investigations conducted by entities other than the FTA (Investigations). This complaint did not result in a lawsuit (Lawsuits).</div>	

**LIST OF TRANSIT-RELATED TITLE VI COMPLAINTS, INVESTIGATIONS, & LAWSUITS**

Version: 2

Effective: 10/01/2020

Owner: Policies, Procedures, Technical Documents Manager

*Printed or downloaded copies are for reference only. Find the most current version in the policy management system (PPM). Go to the intraweb and click Policies and Procedures.***A. Details Regarding the Response to Barrington Price's Complaint (Case Number 0008093)**

**11/05/20:** Customer Service logs complaint and escalates to Legal Affairs. Manager of Loss Prevention contacts Barrington Price to explain the process of filing a Title VI complaint. Manager of Loss Prevention mails a letter acknowledging Barrington Price's request to file a written Title VI complaint along with a Title VI Complaint Form. The correspondence includes a postage paid envelope and instructions for returning the form. Manager of Loss Prevention commences preliminary investigation activities.

**11/09/20 – 11/18/20:** The Manager of Loss Prevention reviews the onboard bus video recording of the incident.

**11/20/20:** Legal Affairs receives completed Title VI Complaint form from Barrington Price.

**12/01/20:** Legal Affairs mails an acknowledgement letter to Barrington Price confirming receipt of his formal completed Title VI Complaint form. Manager of Loss Prevention commences formal investigation.

**12/22/21:** Manager of Loss Prevention and Director of Service Delivery interview Earl Roberson.

**02/16/21:** Authority mails Notification letter to Barrington Price communicating that the investigation had concluded and that RTS would provide a final letter with the findings.

**03/18/21:** Legal Affairs reviews the results of the video transcript, the in-person interview with Earl Roberson, and the details of the complaint. Legal Affairs concludes that no discrimination on the basis of race occurred.

**03/31/21:** Authority mails final letter Barrington Price summarizing the findings and concluding the investigation.

**04/01/21:** Authority closes the investigation and complaint.

**RGRTA LIST OF TRANSIT-RELATED TITLE VI COMPLAINTS, INVESTIGATIONS, & LAWSUITS**

Version: 2

Effective: 10/01/2020

Owner: Policies, Procedures, Technical Documents Manager

Printed or downloaded copies are for reference only. Find the most current version in the policy management system (PPM). Go to the intraweb and click Policies and Procedures.

**2.0. Investigations****2.1. August 02, 2022 and New York State Division of Human Rights**

Basis	Summary	Status Response/Final Findings
<input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Color <input type="checkbox"/> National Origin	<p><u>COMPANY</u></p> <p><input type="checkbox"/> RGRTA <input type="checkbox"/> RTS <input type="checkbox"/> RTS Access <input type="checkbox"/> RTS Genesee</p> <p><input type="checkbox"/> RTS Livingston <input type="checkbox"/> RTS Ontario <input checked="" type="checkbox"/> RTS Orleans <input type="checkbox"/> RTS Wayne</p> <p><input type="checkbox"/> RTS Wyoming</p> <p><u>LOCATION</u></p> <p>4 Canandaigua-Geneva (Routes 5 &amp; 20)</p> <p>Route 255 Canandaigua-Geneva (Routes 21 &amp; 96) Shortsville flag stop</p> <p><u>ALLEGED DISCRIMINATION</u></p> <p>Complaining party: Andrea Desius, an RTS Ontario customer.</p> <p>RTS Ontario Bus Operator and Transportation Specialist are alleged to have discriminated.</p> <p>Allegations: The Complainant, Andrea L. Desius alleges that on or about August 1, 2022 she was waiting for the RTS Ontario bus at a flag stop and the RTS Bus Operator passed her up / refused to provide service. The Complainant alleges she contacted the local RTS Ontario office and was informed that the bus was too far down the road to return to the requested flag stop location. The Complainant alleges discriminatory treatment by RTS based on her race and gender. Andrea Desius filed a complaint with New York State Division of Human Rights ("Division") on August 02, 2022. RGRTA Legal Affairs received a Notice of Charge of Discrimination and Verified Complaint from the Division (10218890) dated August 03, 2022, on August 08, 2022 through USPS mail.</p> <p>The potential disparate impact of the alleged discrimination is that the customer was denied access to service on basis of race and gender.</p>	<p><input checked="" type="checkbox"/> Active  <input type="checkbox"/> Closed</p> <p><u>RESPONSE (Timeline of Actions)</u></p> <p>The Authority's preliminary investigation which included analysis of bus video surveillance suggests that the Bus Operator may have been distracted by a customer asking the Bus Operator a question right at the moment that the Complainant was attempting to flag down the bus.</p> <p>The Authority has retained Harris Beach, PLLC to formally respond to the charge and defend the case.</p> <p>On August 24, 2022, RGRTA formally responded to the charge, through defense counsel, and awaits the determination to be made by the Division. If there is a probable cause finding, then RGRTA will be ordered to appear at a hearing before an Administrative Law Judge.</p> <p>On March 08, 2032, the Division issued a determination letter of NO PROBABLE CAUSE.</p> <p><u>FINAL FINDINGS</u></p> <p>After investigation and following opportunity for review of the related information and evidence, the Division determined there is NO PROBABLE CAUSE to believe that RGRTA has engaged or is engaging in the discriminatory practice complained of. The complaint was ordered dismissed and the file closed.</p>

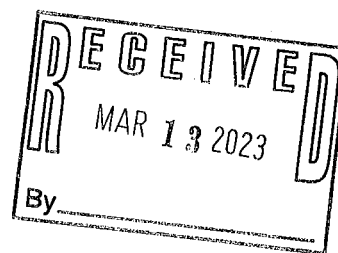
### 3.0. Lawsuits

There are no lawsuits to report for the program period of 2020-2023.





**Division of  
Human Rights**



NEW YORK STATE  
DIVISION OF HUMAN RIGHTS

NEW YORK STATE DIVISION OF  
HUMAN RIGHTS on the Complaint of

ANDREA L. DESIUS,

Complainant,

v.

ROCHESTER GENESEE REGIONAL  
TRANSPORTATION AUTHORITY,

Respondent.

DETERMINATION AND  
ORDER AFTER  
INVESTIGATION

Case No.  
10218890

On 8/2/2022, Andrea L. Desius filed a complaint with the New York State Division of Human Rights ("Division") charging the above-named respondent with an unlawful discriminatory practice relating to public accommodation because of sex, race/color in violation of N.Y. Exec. Law, art. 15 (Human Rights Law).

After investigation, and following opportunity for review of related information and evidence by the named parties, the Division has determined that there is NO PROBABLE CAUSE to believe that the respondent has engaged in or is engaging in the unlawful discriminatory practice complained of. This determination is based on the following:

Investigation did not disclose sufficient evidence to support the allegations of unlawful discrimination that are contained in the complaint. Investigation showed Complainant was attempting to flag down Respondent's bus along a route in Shortsville, NY, but the bus did not stop, and passed Complainant by. Though Complainant speculates that she was denied access to Respondent's public accommodation because of her race and/or sex, investigation did not disclose evidence in support of such a nexus. Review of camera footage from the bus at the time of the incident supported Respondent's claim that the driver was not aware of Complainant's presence when he failed to stop for her, and also disclosed that two of the individuals riding on the bus prior to the driver's passing Complainant appeared to be female and African-American, respectively. There is insufficient evidence to support a conclusion Complainant was denied

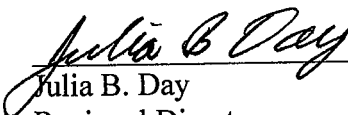
access to Respondent's public accommodation on the basis of her race and/or sex. Therefore, there is no probable cause to support the allegations of the complaint.

The complaint is therefore ordered dismissed and the file is closed.

PLEASE TAKE NOTICE that any party to this proceeding may appeal this Determination to the New York State Supreme Court in the County wherein the alleged unlawful discriminatory practice took place by filing directly with such court a Notice of Petition and Petition within sixty (60) days after service of this Determination. A copy of this Notice and Petition must also be served on all parties including General Counsel, State Division of Human Rights, One Fordham Plaza, 4th Floor, Bronx, New York 10458. DO NOT FILE THE ORIGINAL NOTICE AND PETITION WITH THE STATE DIVISION OF HUMAN RIGHTS.

Dated: **MAR 08 2023**  
Rochester, New York

STATE DIVISION OF HUMAN RIGHTS

By:   
Julia B. Day  
Regional Director

## EXHIBITS

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# Exhibit 07: Public Participation

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## PUBLIC PARTICIPATION PLAN, 2023-2026

### BOARD APPROVED POLICY

Version: 4

Effective: 05/05/2023

Next Review: Triennial or Substantive Change  
Owner: Governance Committee

Printed or downloaded copies are for reference only.

### 1.0 Purpose

This plan documents the public involvement process and procedures of the Rochester Genesee Regional Transportation Authority (RGRTA). If requested, a Spanish translation of this plan will be provided. Those who are blind or have low vision may request a large font format or braille version of the plan. Additionally, the plan is available on the RGRTA website at [www.myRTS.com](http://www.myRTS.com).

### 2.0 RGRTA's Business Profile

RGRTA is a public benefit corporation and a component unit of the State of New York. Created in 1969 by an act of the State Legislature, the Authority is charged with the continuance, further development, and improvement of public transportation and other related services within the Genesee/Finger Lakes region. Current member counties include Genesee, Livingston, Monroe, Ontario, Orleans, Seneca, Wayne, and Wyoming. RGRTA's services encompass urban, suburban, and rural areas, as well as complementary paratransit service in compliance with the Americans with Disabilities Act (ADA).

RGRTA is comprised of nine subsidiary transportation service companies, the largest of which is Regional Transit Service ("RTS"). RTS provides fixed route and demand response service in Monroe County. One of these subsidiaries, RTS Access, provides comparable complementary paratransit service in Monroe County.

### 3.0 Language Assistance

The most recent survey data gathered by our paid market research consultant indicates that between 30% to 40% of respondents believe the use of English makes it difficult to navigate the transit system. This Public Participation Plan encourages community involvement while providing language assistance for Limited English Proficient customers. According to the analysis in our Limited English Proficient Language Assistance Program, LEP exposure is less than 5% across the service area. The dominant language is Spanish. The resources available to RGRTA are bilingual personnel, professional interpreting, translation, and transcription services. RGRTA regularly provides in-person Spanish translators during public information meetings and provides written notices in English and Spanish. Technologies for purchasing fare are available in English and Spanish. Our Customer Service Representatives have access to telephonic live interpreters to assist customers whose primary language is not English.

### 4.0 Americans with Disabilities Act (ADA)

The Americans with Disabilities Act (ADA) of 1990 encourages the involvement of people with disabilities in the development and improvement of transportation and paratransit services. In accordance with ADA guidelines, all meetings conducted by RGRTA take place in locations that are accessible to persons with mobility limitations.

When necessary to ensure effective communication, auxiliary aids and services are furnished to allow a person with a disability to participate, unless an undue burden or fundamental alteration would result. "Auxiliary aids" include such services or devices as qualified interpreters, assistive listening headsets, television captioning, and decoders, telecommunication devices for deaf persons (TDDs), videotext displays, readers taped text, embossed braille materials, and large print materials. RGRTA public meeting notices specify that special accommodations will be provided upon request.

### 5.0 Public Participation

The mission of RGRTA is to provide vital, safe, and sustainable transportation services that connect the community and promote a better quality of life. To achieve this mission, it is incumbent upon the Authority to



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TRANSPORTATION  
AUTHORITY

## PUBLIC PARTICIPATION PLAN, 2020-2023

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provide an affordable and accessible, high quality transportation service to the constituents of its service area. Essential to creating transportation service that meets these fundamental transportation needs is an open, responsible organization that provides clear and timely messaging about services, is transparent in process, and encourages input through an inclusive involvement process. This open communication and involvement is expressed unequivocally to all customers as well as to community leaders and transit stakeholders from the business, social services, and institutional sectors.

To ensure that citizen input occurs on a regular basis, public meetings are scheduled routinely and in the event of special projects. The advent of new technologies has afforded RGRTA the opportunity to interact with and seek involvement from members of its service area more broadly than in the past. Social media, texting, and email are invaluable tools for soliciting input about the needs and desires of the community, thereby allowing the Authority to gather public input to tailor programs and initiatives to serve the citizens in the area.

#### **5.1. Social Media, Email and Text Outreach**

RGRTA uses social media, text messages, and email newsletters to interact with individuals, groups, businesses, and strategic partners to improve customer satisfaction. Social media and direct email communication is used as a method of public participation as well as information sharing and gathering.

#### **5.2. Public Website**

RGRTA provides transparency into the organization through the posting of minutes and other governance related documents on its website ([www.myRTS.com](http://www.myRTS.com)). The website is also utilized for customer outreach and includes an interactive route planner, a "Special Projects and Route Planning" section and comment submission capabilities.

The website provides basic information about RGRTA, including the most up to date information regarding fares, schedules, events, programs, and news. All public workshops, information meetings, and hearings are advertised on the RGRTA website. The website is also used as a medium in which customers and the public can provide comments during a study.

#### **5.3. Digital & Newspaper Advertisements, and News Releases**

To solicit participation, these media are used to advertise changes in fares and service, as well as the meetings and hearings associated with such changes. These mediums are also used to advertise and disseminate information about RGRTA that at times may be strictly informational only and may not require public participation.

#### **5.4. Meetings**

Public information meetings are valuable for offering information, gathering community input, raising community awareness, and for developing trust and a sense of partnership with the community. For RGRTA, public information meetings are held in the following formats: neighborhood meetings, public meetings, public hearings, open houses, and informal community meetings.

##### **5.4.A. Neighborhood Meetings**

These meetings are intended to offer information and gather input from residents living directly around the RGRTA campus in the City of Rochester. The Authority has fostered a strong relationship with the Beechwood Neighborhood Coalition, the North East Main Neighbors United, and the East Main Street Business Association.

RGRTA often provides slides and image boards to illustrate topics of discussion. Participants are encouraged to ask questions of RGRTA staff members in attendance. Questions are answered during the meeting or, when needed, in-depth answers are provided as a follow up to the meeting. All customer and community feedback





## PUBLIC PARTICIPATION PLAN, 2020-2023

### BOARD APPROVED POLICY

are entered into our Customer Relationship Management (CRM) tool.

Neighborhood meetings are advertised by the neighborhood association via email to its membership as well as on its website. RGRTA also mentions its attendance at neighborhood meetings on its social media outlets.

#### 5.4.B. Public Meetings

Notices for public meetings are advertised on the RGRTA website, and via other social media outlets, as well as in buses, on bus shelters and community bulletin board locations in the service area where the meeting is scheduled to take place. Targeted customers may be sent an email, text, or direct mail communication regarding information meetings thought to be of particular interest to them. For example, a meeting seeking to provide information to and receive input from the paratransit community would be promoted by sending email or direct mail communication to all registered paratransit customers in addition to the general postings in the community and on the Authority website and Facebook and Twitter page.

##### 1. PUBLIC LISTENING/INFORMATION SESSIONS

The sessions are held at handicap accessible facilities at varying times during the day to accommodate the schedules of those interested in attending. Meetings are facilitated by members of the RGRTA Service Planning Department along with staff from the Communications & Marketing Department and other relevant staff members as appropriate for the issue at hand.

Public Information Sessions typically include an American Sign Language Interpreter. If attendees request the presence of one or more language interpreters, or request other auxiliary aids, those are provided as well.

##### 2. PUBLIC MEETING PRESENTING DRAFT ALTERNATIVES

As routes are revised, customer input is collected and incorporated where possible. A public meeting is held for presenting draft route adjustment alternatives. These meetings are held at an accessible facility. Public meetings presenting draft alternatives are facilitated by members of the RGRTA Service Planning Department along with staff from the Communications & Marketing and Customer Service Departments and other relevant staff members as appropriate for the issue at hand.

##### 3. PUBLIC NOTIFICATION OF FINAL RECOMMENDATIONS

If a recommended route adjustment does not require a public hearing, final recommendations are posted on RGRTA's website along with a timetable for implementation.

#### 5.4.C. Public Hearings

If a formal public hearing is required, a presentation will be made that provides information about the need and purpose of the proposal being presented.

Members of the public are invited to register to speak at the hearing or to submit written comments. The presentation will also be posted on the Authority's website and the public will be able to submit written comment for at least 3 days following the hearing.

Basic questions regarding the proposal may be addressed during the hearing at the discretion of the presenter; however, detailed questions will be answered in writing and posted on the Authority's website within a reasonable amount of time after the close of the public comment period. These questions and answers will be made a part of the official transcript of the proceeding. Public hearings are facilitated by staff from the Communications & Marketing Department along with members of the Service Planning Department, other relevant staff and a member, or members, of the Executive Management Team.



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## PUBLIC PARTICIPATION PLAN, 2020-2023

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These meetings are advertised as public hearing notices in the local daily newspaper, the *Democrat and Chronicle*, as well as on the RGRTA website, via social media posts, signage on buses, news releases issued to local media outlets, and invitations to customers and special groups. When prudent, paid public hearing notices will also run in the community newspapers prevalent to the affected town or village. Paid advertisements include contact information about the availability of language assistance.

All attendees are asked to register their attendance regardless of whether they have asked to speak. RGRTA will provide all attendees with a comment card for their use. Public hearings are recorded by a stenographer so that the meeting, along with all written commentary, questions, and answers are recorded and made a part of the public record. The entire record of the hearing is presented to the RGRTA Board of Commissioners before a decision is made on the proposal.

RGRTA will provide a report of all public comments received, RGRTA's responses to the comments, and any recommended changes in the proposal because of public comment to the Board of Commissioners. The report will be posted to the website. The Board of Commissioners may authorize the implementation of the changes or may direct other action.

#### 5.4.D. Open House – RTS/Paratransit

These meetings are intended to offer information and gather input from customers and community stakeholders about RTS service. They are held on a quarterly basis in various accessible locations around the RTS service area and are typically facilitated by members of the Communications & Marketing Department, the Customer Service Department, and a member or members of the Executive Management and Leadership Teams. Some RTS Open Houses have a scheduled topic for discussion that is publicized before the meeting and others are conducted as an open forum to address any issues that members of the public bring forth. RGRTA will track the customer feedback received during the open houses in our Customer Relationship Management System and customers are contacted, if they indicate they would like a follow up regarding their concern or question within 1 week after the open house is held. Future consideration may be given to host these "open forum" meetings virtually in an on-line chat format to allow even greater public participation.

#### 5.4.E. Informal Community Meetings

These meetings are held at the request of specific community groups who take on the responsibility of advertising the meeting and inviting the participants. RGRTA personnel make every effort to provide complete, accurate, and timely information at these opportunities. Questions asked and concerns raised that cannot be resolved at the meeting will be resolved afterward and the resolution communicated to those in attendance, either in written form by the project manager or at a follow-up meeting. Meeting organizers are encouraged to inform RGRTA meeting planners of the need for language assistance service prior to the meeting so that arrangements can be made. Some of the meetings of this nature are held to gain public input, while others are organized to provide instruction on how to ride the bus.

### 5.5. Regional Customers

In addition to RTS and RTS Access, RGRTA is comprised of seven regional transportation subsidiaries. They are RTS Genesee, RTS Livingston, RTS Ontario, RTS Orleans, RTS Seneca, RTS Wayne, and RTS Wyoming. RGRTA provides information to and seeks commentary from customers residing in the communities serviced by these transit subsidiaries utilizing the same methods employed by RTS. In addition, regional bus schedules printed in Spanish (paper and electronic format) are made available in those regions with a high Hispanic population, as are bus shelter schedule information posters. A "How to Enjoy the Ride Guide" (paper format) is also distributed by the regional subsidiaries.



## PUBLIC PARTICIPATION PLAN, 2020-2023

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### 6.0 Equity Impact or Fare Changes

RGRTA undertakes a public participation and outreach process for

1. Major service changes determined to have disparate impact; or
2. Major service changes determined to have disproportionate burden; or
3. Fare changes.

This process includes public outreach, solicitation of public comment, and may include public hearing(s).

RGRTA will translate materials into, and provide translation services for, the language of any LEP language group as specified in the Language Assistance Plan.

Special promotional fares are not included in the requirements of this section.

#### 6.1. Public Outreach

RGRTA posts information and accepts comments regarding the proposed changes in person (written or verbal), on its website, and via the USPS mail. RGRTA will:

- a. Hold multiple public information meetings in affected communities;
- b. Hold stakeholder group meetings; and
- c. Present changes to elected government officials.

RGRTA will consider the population likely to be affected and the resources available to determine how best to enhance participation by affected minority, low-income, and/or LEP persons. The purpose of these efforts is to include minority, low-income, and LEP populations in the planning stages.

If RGRTA is evaluating the site or location of facilities including—but not limited to—storage facilities, maintenance facilities, or operations centers, RGRTA shall engage in public outreach to persons potentially impacted by the siting of facilities.

#### 6.2. Soliciting of Public Comment

RGRTA will disseminate information, solicit public comment, and respond to public comment on transit service and fare changes to the extent reasonable and practical.

Fare changes or major service changes are submitted to the RGRTA Board of Commissioners upon an initial round of public discussion.

#### 6.3. Public Hearing

Anytime RGRTA conducts a public hearing, the RGRTA Board of Commissioners will authorize formal solicitation of public commentary. RGRTA will conduct public hearings for situations including, but not limited to, a major service change found to have either a disparate impact or a disproportionate burden, or a proposed fare change.

RGRTA will publish a notice of the proposed change(s) in newspapers of general circulation and, if applicable, in newspapers oriented to the specific groups or communities affected and in buses. Such published notices will include the date, time, and location of any public hearings. Not sooner than 30 days after the notices are published and posted at least one public hearing shall be held.

RGRTA will provide a report of all public comments received, RGRTA's responses to the comments, and any recommended changes in the proposal because of public comment to the Board of Commissioners. The Board may authorize the implementation of 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 via the methods stated above.



## PUBLIC PARTICIPATION PLAN, 2020-2023

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## 7.0 Proposed Minor Route/Schedule Changes or Route Overhaul Projects

### 7.1. Route Overhaul Projects

RGRTA's Service Planning Department will hold two or three Public Listening/Information Sessions to get initial input from customers about the route. Communications & Marketing will notify the media about the sessions and publicize the sessions through social media, on buses, email, and text messages. Communications & Marketing solicits public input through all its communication channels: social media, online, phone, and in person. Then, the Service Planning Department will hold two to three Public Meetings Presenting Draft Alternatives to show proposals and get feedback. Finalized route overhaul changes are posted on the website and communication through the Communications & Marketing Department during regular quarterly schedule change communications.

### 7.2. Minor Route and Schedule changes

Except when impossible because of an emergency condition, advance notice of not less than two weeks 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 elected officials representing any affected local government entity.

## 8.0 Additional Participation Tools

### 8.1. Language Line

In order to be responsive to the language needs of its constituency, RGRTA has established a Language Line account, which provides the Authority with reliable and swift access to telephonic interpreter services in more than 100 languages.

### 8.2. Spanish Bus Schedules

All RTS Route schedules are complemented with Spanish language translations, when requested by customers.

### 8.3. Comment Cards

Comment Cards are used to solicit customer input on specific complaints, suggestions, compliments, and questions. Comment forms are available at the RTS Transit Center Info Desks and during public information sessions/open houses. We encourage people to use [www.myRTS.com/contact-us](http://www.myRTS.com/contact-us) for specific complaints, suggestions, compliments, and questions. This is in addition to encouraging customers to contact customer service by phone or visiting an RTS transit Center info desk. No matter how the customer feedback is shared, it is logged and tracked within the Customer Relationship Management (CRM) system.

### 8.4. TTY

The RGRTA Customer Service Department provides a TTY line for customers who are deaf or hard-of-hearing.

### 8.5. Braille

RGRTA utilizes a braille translation service for customers who require braille transcription files. These are provided upon request.

### 8.6. Large Print Brochures / myRTS.com Font Size & Screen Reader

Large print format is available upon request for materials. The [www.myRTS.com](http://www.myRTS.com) font size can be enlarged and is compatible with online screen readers to assist customers with low-vision or vision loss.

## Community Engagement List

This is a list of groups, organizations, and companies who engage with RTS and RTS Access—providing input and often participating in Train-the-Trainer events.

1. Action for a Better Community <https://www.abcinfo.org/>
2. American Council of the Blind <https://www.acb.org/>
3. American Federation of the Blind – Rochester Chapter <https://nfbny.org/rochester>
4. Anthony L. Jordan Health Center <https://jordanhealth.org/locations/>
5. ArcWorks <https://arcworksrochester.org/>
6. Baden Street Settlement <https://badenstreet.org/>
7. Beechwood Neighborhood Coalition <http://www.beechwood14609.com/>
8. Center for Disability Rights <https://cdrnys.org/>
9. Continuing Developmental Services, Inc., CDS Life Transitions, CDS Monarch <https://cdslifetransitions.org/cds-monarch/>
10. Catholic Charities Family and Community Services <https://ww2.fcscharities.org/>
11. City of Rochester <https://www.cityofrochester.gov/>
12. Community Design Center Rochester <https://cdcrochester.org/index.html>
13. Community Resource Collaborative <https://commresourcecollab.org/>
14. Compeer Rochester <https://www.compeerrochester.org/>
15. Connected Communities (EMMA and Beechwood neighborhoods) <https://www.connectedcommunitiesroc.org/about>
16. Coordinated Care Services, Inc. <https://www.ccsi.org/>
17. Family Service Communities Danforth Towers <https://fscrochester.org/danforth-towers-apartments>
18. Edison Career and Technology High School <https://www.rcsdk12.org/edison>
19. Episcopal Senior Life Communities <https://episcopalseniorlife.org/>
20. E.R.A.S.E. (Eliminating Racism & Seeking Equity) <https://erasenow.org/>
21. Flower City Group <https://flowercitygroup.com/>
22. Finger Lakes Performing Provider System <https://flpps.org/>
23. Foodlink & Curbside Market <https://foodlinkny.org/program/curbside-market/>
24. Friendly Home <https://www.friendlyseniorliving.org/friendly-home/>
25. Genesee/Finger Lakes Regional Planning Council <https://gflrpc.org/>
26. Genesee Transportation Council Metropolitan Planning Organization <https://www.gtcmppo.org/>
27. Guiding Eyes for the Blind <https://www.guidingeyes.org/>
28. Goodwill of the Finger Lakes <https://www.goodwillfingerlakes.org/>
29. Heritage Christian Services <https://heritagechristianservices.org/>
30. Holy Childhood <https://holychildhood.org/>
31. Henrietta Senior Center <https://www.henrietta.org/community/page/senior-center>
32. Ibero-American Action League <https://www.iberro.org/>
33. Ibero-American Development Corporation <http://iadconline.org/>
34. Isaac Training & Education Center <https://itctraining.com/>

35. Monroe County Library System <https://libraryweb.org/>
36. LiDestri Food and Drink <https://lidedstrifoodanddrink.com/>
37. Lifespan <https://www.lifespan-roch.org/>
38. Lifetime Assistance, Inc. <https://www.lifetimeassistance.org/>
39. Matthews Closet <https://www.matthewscloset.org/>
40. Monroe 2-Orleans BOCES <https://www.monroe2boces.org/Default.aspx>
41. Monroe Community Hospital <https://www.monroehosp.org/>
42. Monroe County, NY <https://www.monroecounty.gov/>
43. Monroe Housing Collaborative, Keller Park Apartments  
<https://www.monroehousingcollaborative.org/keeler-park-apartments/>
44. Monroe One Educational Service (Monroe One BOCES) <https://www.monroe.edu/monroe>
45. Nazareth University, formerly Nazareth College <https://www2.naz.edu/>
46. New York State Education Department <http://www.nysed.gov/>
47. New York State Office of Children and Family Services <https://ocfs.ny.gov/main/>
48. New York State Office of Mental Health <https://omh.ny.gov/>
49. Office of Adult and Career Education Services (OACES), a division of the Rochester City School District  
<https://oaces.net/>
50. PathStone Corporation <https://pathstone.org/>
51. Person Centered Housing Options, Inc. <https://pcho.org/>
52. Pittsford Rotary Club <https://www.pittsfordrotaryclub.org/>
53. Planned Parenthood of Central and Western NY <https://www.plannedparenthood.org/planned-parenthood-central-western-new-york>
54. Reconnect Rochester <https://reconnectrochester.org/>,
55. Regional Center for Independent Living (RCIL) <https://www.rcil.org/>
56. Remedy Staffing, Rochester Branch <https://www.remedystaffing.com/locations/rochester-ny/81518-7754>
57. Rochester City School District <https://www.rcsdk12.org/>
58. Rochester Educational Opportunity Center (REOC) <https://reoc.brockport.edu/>
59. Rochester Institute of Technology <https://www.rit.edu/>
60. Rochester-Monroe Anti-Poverty Initiative <https://endingpovertynow.org/>
61. Rochester Refugee Resettlement Services <https://www.rochesterrefugeeservices.org/>
62. Rochester Regional Health, <https://www.rochesterregional.org/>
63. Rochester Rehabilitation <https://www.rochesterrehab.org/>
64. Rochester Spinal Association <https://www.rochesterspinalassociation.org/>
65. Rochester Works <https://rochesterworks.org/>
66. Roman Catholic Diocese of Rochester <https://www.dor.org/>
67. Rotary Club of Pittsford <https://www.pittsfordrotaryclub.org/>
68. Salvation Army of Rochester NY <https://easternusa.salvationarmy.org/empire/rochester/>
69. Self-Advocacy Association of New York State, Inc. <https://sanys.org/>
70. Shire at Culverton Adult Home <http://www.shireseniorliving.com/sjncenter.org>



71. St. Joe's House of Hospitality <http://www.saintjoeshouse.org/blog/>
72. St. Joseph's Neighborhood Center <https://www.sjncenter.org/>
73. Star Bridge <https://www.starbridgeinc.org/>
74. SUNY Brockport <https://www2.brockport.edu/about/>
75. The Arc of Monroe <https://arcmonroe.org/>
76. The Center for Youth <https://www.centerforyouth.net/>
77. The Council of Agency Executives <https://www.agencyexecutives.com/>
78. Thomas P. Ryan Recreation Center <https://www.cityofrochester.gov/ryancenter/>
79. Town of Irondequoit New York <https://www.irondequoit.org/>
80. University of Rochester Medical Center <https://www.urmc.rochester.edu/>
81. Villa of Hope <https://www.villaofhope.org/>
82. Visit Rochester New York <https://www.visitrochester.com/>
83. Volunteers of America Upstate New York <https://www.voaupny.org/>
84. Veterans Outreach Center <https://veteransoutreachcenter.org/>
85. Webster Public Library <https://www.websterlibrary.org/>
86. Willow Domestic Violence Center <https://willowcenterny.org/>

## EXHIBITS

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# Exhibit 08: LEP Language Assistance Program



# LIMITED ENGLISH PROFICIENCY LANGUAGE ASSISTANCE PLAN, 2023 – 2026

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VERSION 5

APPROVED BY DANIEL DELAUS, GENERAL COUNSEL

DATE SUBMITTED TO FTA (TRAMS) 06/01/2023

EFFECTIVE 06/01/2023

OWNER POLICIES, PROCEDURES, TECHNICAL  
DOCUMENTS MANAGER

NEXT SUBMISSION DUE 06/01/2026

PRINTED OR DOWNLOADED COPIES ARE FOR REFERENCE ONLY.

THE MOST CURRENT VERSION OF THE SOURCE DOCUMENT RESIDES ON THE RTS INTRAWEB UNDER  
POLICIES AND PROCEDURES IN POLICY MANAGER [HTTP://POLICYMANAGER/DEFAULT.ASPX](http://POLICYMANAGER/DEFAULT.ASPX).

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## 1.0 Introduction

This Language Assistance Plan ("LAP") addresses the Rochester Genesee Regional Transportation Authority's (RGRTA) responsibilities as a recipient of Federal financial assistance regarding the needs of individuals with limited English language skills. RGRTA prepared its LAP in accordance with the following:

- Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin; and
- Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency" which indicates that differing treatment based upon a person's inability to speak, read, write, or understand English is a type of national origin discrimination.

Limited English proficient ("LEP") persons do not speak English as their primary language and have limited ability to read, speak, write, or understand English. RGRTA conducts the U.S. DOT four-factor LEP analysis and uses the



## LANGUAGE ASSISTANCE PROGRAM: FOUR-FACTOR ANALYSIS 2023 RESULTS

resulting conclusions to identify reasonable steps for providing language assistance to LEP persons who wish to access its services.

### 1.1. Department Activities

<b>Transportation Services</b>	<ul style="list-style-type: none"> <li>Analyze ridership and customer survey data, and American Community Census (ACS) data.</li> <li>Update the Four Factor Analysis.</li> </ul>
<b>Customer &amp; Community Engagement</b>	<ul style="list-style-type: none"> <li>Recommend outreach and assistance opportunities.</li> <li>Engage community organizations connected to LEP populations for input.</li> </ul>
<b>Communications</b>	<ul style="list-style-type: none"> <li>Apply language assistance tactics defined in the Public Participation Plan and Language Assistance Plan.</li> <li>Fund language assistance activities and materials (budget).</li> </ul>
<b>Legal Affairs</b>	<ul style="list-style-type: none"> <li>Update the Language Assistance Plan.</li> <li>Communicate the Language Assistance Plan internally.</li> <li>Submit the plan triennially to the FTA with the Title VI Program Plan.</li> <li>Fund vital document translation/transcription (budget).</li> </ul>
<b>Customer Service</b>	Use telephonic interpreter service when serving LEP customers.
<b>Customer-facing Employees (Operators, Road Supervisors)</b>	Use the language assistance card to help the customer access telephonic interpreter services.

### 1.2. Summary of 2023-2026 Plan

Conclusions	Steps
<ul style="list-style-type: none"> <li>LEP exposure is 3.82% across the service area. The dominant language is Spanish.</li> <li>Higher percentages of Spanish speaking LEP persons are in the PUMA counties where RTS Genesee, RTS Orleans, RTS, RTS Access, RTS Ontario operate.</li> <li>RGRTA rates the frequency with which LEP persons encounter its services as being on the higher end of Occasional (41-60%).</li> <li>On-time arrival and route coverage are the most important service factors.</li> <li>The resources available to RGRTA are bilingual personnel, professional interpreting, translation, and transcription services. The overall cost to provide LEP assistance was \$14,987.99 for 2020-2023.</li> </ul>	<ul style="list-style-type: none"> <li>Continue to train staff to use telephonic interpreters. Continue to educate staff on interacting with LEP persons.</li> <li>Identify solutions to mitigate or eliminate the difficulties LEP customers experience while navigating the system.</li> <li>Explore other interpretive technologies and services.</li> </ul>

## 2.0 Four-Factor Analysis 2023 Results

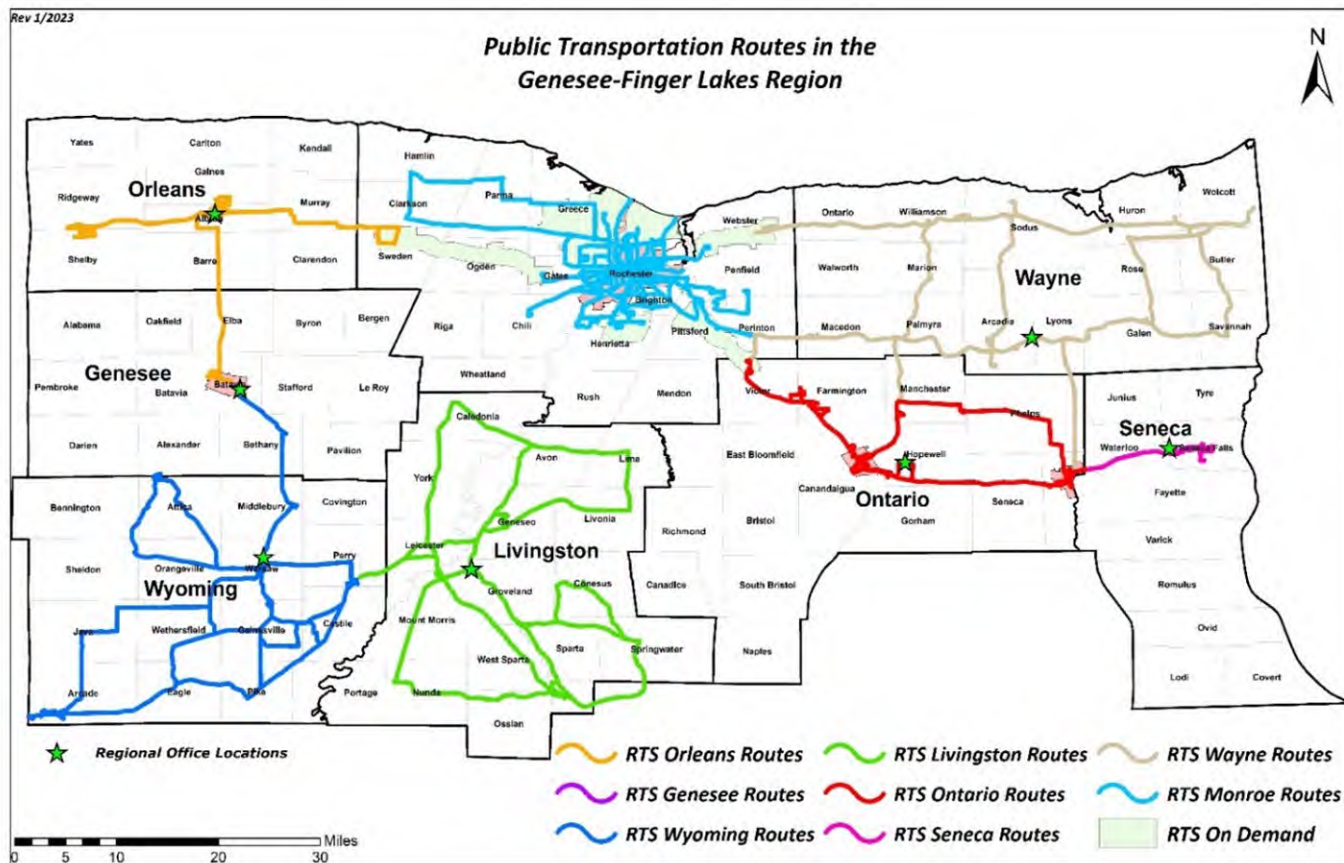
Spanish is the language spoken by the highest number of LEP persons. RGRTA's language assistance resources will focus on providing the following information in Spanish: trip-planning, civil rights protected under Title VI, service updates, and RTS Go fare payment, and eligibility materials regarding certification (paratransit).

**1. The number or proportion of LEP persons in the service area who may be served by or are likely to encounter an Authority program, activity, or service.**

## LANGUAGE ASSISTANCE PROGRAM: FOUR-FACTOR ANALYSIS 2023 RESULTS

### 2.1. LEP Exposure for RGRTA

RGRTA is a public benefit corporation, which includes nine separate business units serving Genesee, Livingston, Monroe, Ontario, Orleans, Seneca, Wayne, and Wyoming counties in the Genesee-Finger Lakes Region of Western New York (Genesee Valley, Region 4). RGRTA's services encompass urban, suburban, and rural areas.



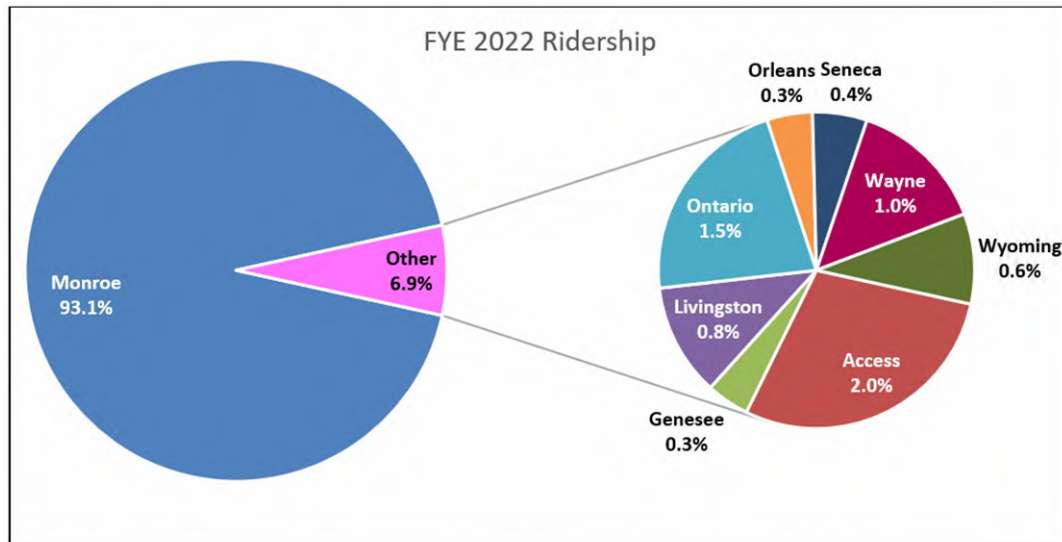
In Monroe County, Regional Transit Service (RTS) provides fixed route service and demand responsive service. RTS Access provides complementary paratransit. The remaining business units ("Regionals") provide route deviation and Dial-a-Ride bus service.



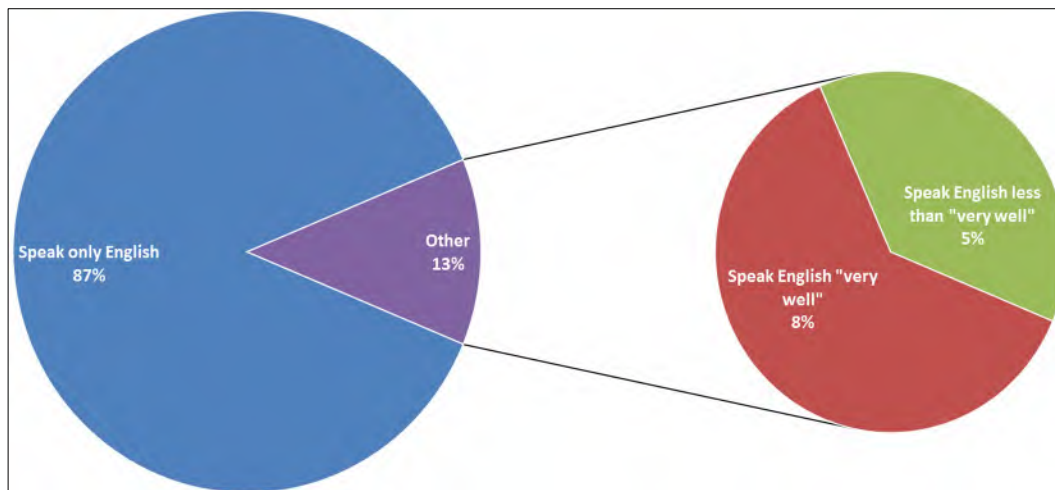


## LANGUAGE ASSISTANCE PROGRAM: FOUR-FACTOR ANALYSIS 2023 RESULTS

RGRTA used 2021-2022 ridership data to and 2017-2021 ACS data to analyze LEP exposure across RGRTA. Combined ridership for the entire service area for fiscal year 2021-22 was 8,099,254 in a service area population of 1,196,531. The ACS tracks 138 languages or language groups in the RGRTA service area, reports the number of non-English speakers within a PUMA, and divides that population into those who speak English “very well”, “well”, “not well”, and “not at all.” For purposes of its analysis, RGRTA makes the following assumptions: 1) the margin of error is 0%; and 2) all speakers who did not respond “very well” are LEP individuals.



2020-2023 Ridership by Company

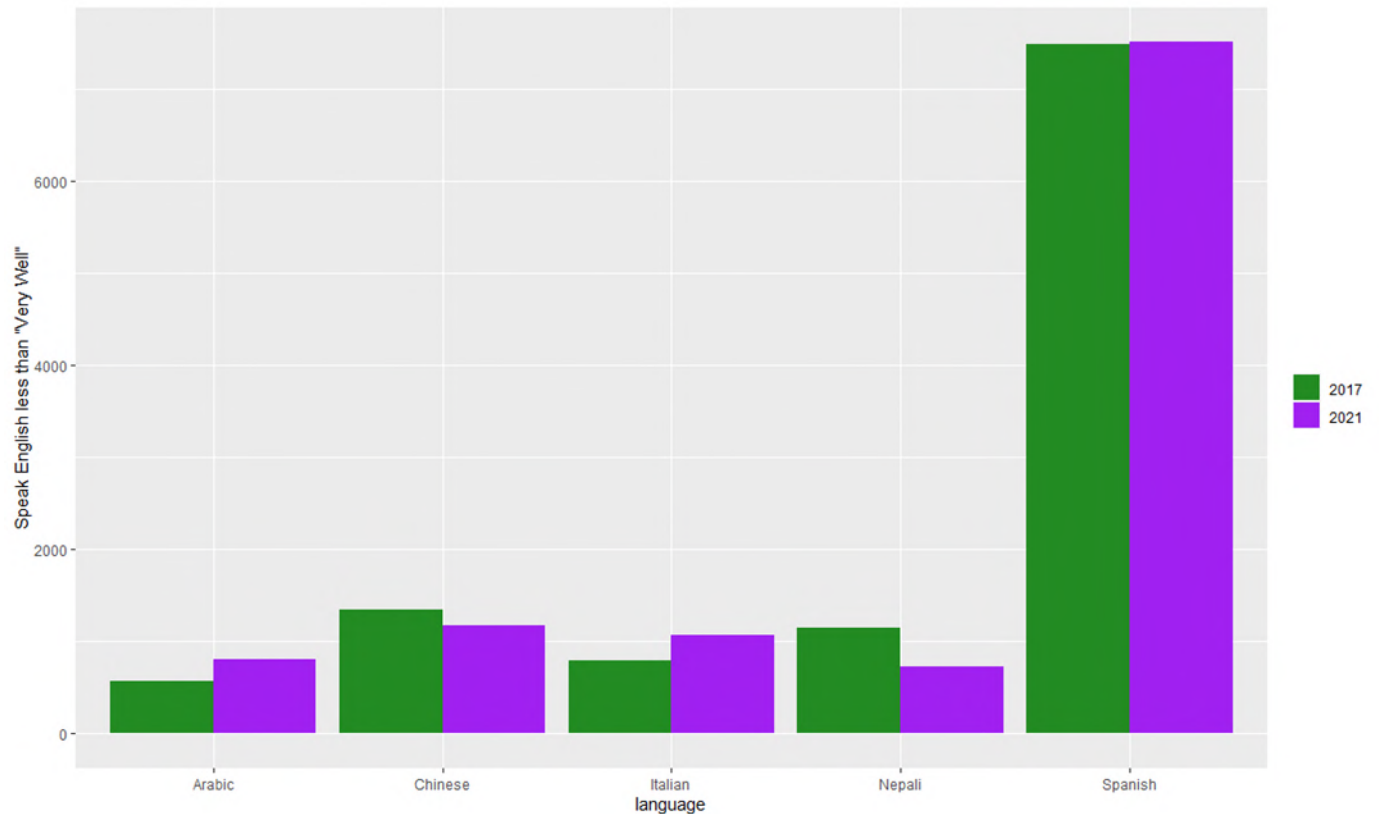


Ridership by English Proficiency



## LANGUAGE ASSISTANCE PROGRAM: FOUR-FACTOR ANALYSIS 2023 RESULTS

Comparison of LEP Populations in 2017 and 2021 by Language



For this segment of the analysis, the conclusions are:

- Individuals speaking English “less than very well” do not exceed 5% across RGRTA or within any specific county in RGRTA’s service region.
- The largest concentrations of LEP persons are in Monroe County and potentially interact with RTS (fixed route) or RTS Access (paratransit).
- The five languages spoken by the largest numbers of LEP persons are Spanish, Chinese, Nepali, Italian, and Arabic. When the numbers are **combined**, the languages represent 28,700 LEP individuals in the entire RGRTA service area (**2.35% of the service area population**).
- Generally, LEP speakers of Nepali decreased and LEP speakers of Arabic and Italian increased.

Significant Increase ↑	Moderate Increase ↑	Moderate Decrease ↓	Significant Decrease ↓
	<ul style="list-style-type: none"> <li>Italian</li> <li>Arabic</li> </ul>	<ul style="list-style-type: none"> <li>Chinese</li> </ul>	<ul style="list-style-type: none"> <li>Nepali</li> </ul>



## LANGUAGE ASSISTANCE PROGRAM: FOUR-FACTOR ANALYSIS 2023 RESULTS

### 2.2. LEP Exposure for Each County Served by an RGRTA Business Unit

Each business unit serves a specific county and spans multiple census tracts. RTS provides fixed route service in Monroe County across 151 census tracts. RTS engages a third-party vendor to conduct a Customer Survey (sometimes called the *Ridership Tracker*) on routes that are representative of the fixed route system. The vendor uses a questionnaire to perform in-person interviews onboard the RTS Connect buses and compiles the results to show trends. Every three months, the vendor interviews between 500 and 600 customers. The results of the Customer Survey data for the last 3 years (Waves 38-49) include the responses to “What is the primary language spoken in your home?” and “Does use of English language pose a difficulty in navigating the RTS system?” The results supplement the analysis for RTS regarding LEP exposure.

Survey Wave	# of Participants	English at Home	Spanish at Home	Difficulty Due to Language
38	520	91%	8%	12%
39	535	89%	8%	23%
40	516	89%	6%	18%
41	511	93%	5%	21%
42	509	89%	6%	16%
43	516	87%	8%	21%
44	523	88%	8%	20%
45	520	88%	8%	16%
46	515	87%	10%	22%
47	531	91%	10%	21%
48	513	91%	8%	31%
49	528	90%	8%	40%

The data shows a rough trend. Two out of ten customers have difficulty navigating the existing fixed route system because of language. Recent surveys also show a trend of English speakers reporting issues with the use of English on the bus system. While such people are definitionally not LEP persons, their needs should still be considered in efforts to make the service linguistically accessible. For this segment of the analysis, the conclusions are, that when evaluated by language, the largest segments of the LEP populations in each **county** speak Spanish. In each **PUMA**, the largest percentages of the Spanish-speaking populations are served by the following subsidiaries: RTS Genesee/Orleans, RTS/RTS Access, and RTS Ontario.

Language	Genesee/Orleans	Livingston/Wyoming	Monroe	Ontario/Yates	Seneca/Wayne
Spanish	1,112	636	15,461	1,355	967
Chinese	168	157	1,920	132	137
Nepali	0	0	2,412	0	0
Italian	16	0	1,828	174	170
Arabic	6	63	1,845	105	14

#### Most Common Languages for 2021 – Populations for Each County

PUMA	Business Unit	LEP Population	% of LEP Population Who Speak Spanish
Genesee/Orleans	RTS Genesee / RTS Orleans	1,703	65.3%
Livingston/Wyoming	RTS Livingston / RTS Wyoming	1,724	36.9%
Seneca/Wayne	RTS Seneca / RTS Wayne	2,919	33.1%
Monroe	RTS / RTS Access	36,851	41.9%
Ontario/Yates	RTS Ontario	3,410	39.7%

#### LEP Populations Across PUMA and Business Units with Percentage of Spanish Speaking LEP



## LANGUAGE ASSISTANCE PROGRAM: FOUR-FACTOR ANALYSIS 2023 RESULTS

- A. Among all the business units, RTS/RTS Access has greatest exposure to LEP individuals. Almost all LEP speakers of Spanish, Chinese, Nepali, Italian, and Arabic reside in the RTS service area.
- B. There is a notable number of LEP individuals speaking Pennsylvania German in the Ontario/Yates PUMA. These individuals are members of the large Old Order Mennonite community in Yates County, which is not served by RGRTA and thus excluded from the analysis. However, there is a rising number of LEP individuals speaking Pennsylvania German in the Seneca/Wayne PUMA. If the population continues to increase significantly, RGRTA will include the population in the LEP exposure evaluation.
- C. The compiled Customer Survey results indicate:
  1. When asked “What is the primary language spoken in your home?” participants answered English (89%), Spanish (8%) and 6% split among Italian, Chinese, Hindi-Urdu, Vietnamese, or Other. Some participants did not answer the question (3%).  
*Note: “What is the primary language spoken in your home?” is a multiple response question; as a result, the total percentages do not equal 100%.*
  2. When asked “Does use of English language pose a difficulty in navigating the RTS system?” participants answered “No” 56% of the time, answered “Yes” 32% of the time, and 12% did not answer the question.

### 2. The frequency with which LEP persons encounter RGRTA programs, activities, or services.

#### 2.3. Frequency (Probability) of Occurrence

Modes of interacting with RGRTA programs, activities, and services include:

- A. Face-to-face Informal (Operators, RTS Transit Center staff)
- B. Face-to-face Formal (In-person surveys and open houses)
- C. Telephone (Customer Service, RTS Access Schedulers/Dispatchers)
- D. Website
- E. Written materials (digital and printed)
- F. *Transit* app (trip reservations, RTS Go fare purchases, trip planning) and *RTS Access Ride Request* app
- G. Machines (farebox, ticket vending machine)
- H. Signs (bus stop signs, onboard bus, digital monitors at the RTS Transit Center busway gates)
- I. Social media and SMS (Twitter, Facebook, text messages)

Based on tracked interactions, RGRTA will use the following scale to rate the frequency with which LEP persons encounter its programs, activities, or services.

<b>Frequent</b>	91-100% likely to occur
<b>Likely</b>	61-90% likely to occur
<b>Occasional</b>	41-60% likely to occur
<b>Seldom</b>	11-40% likely to occur
<b>Unlikely</b>	0-10% likely to occur

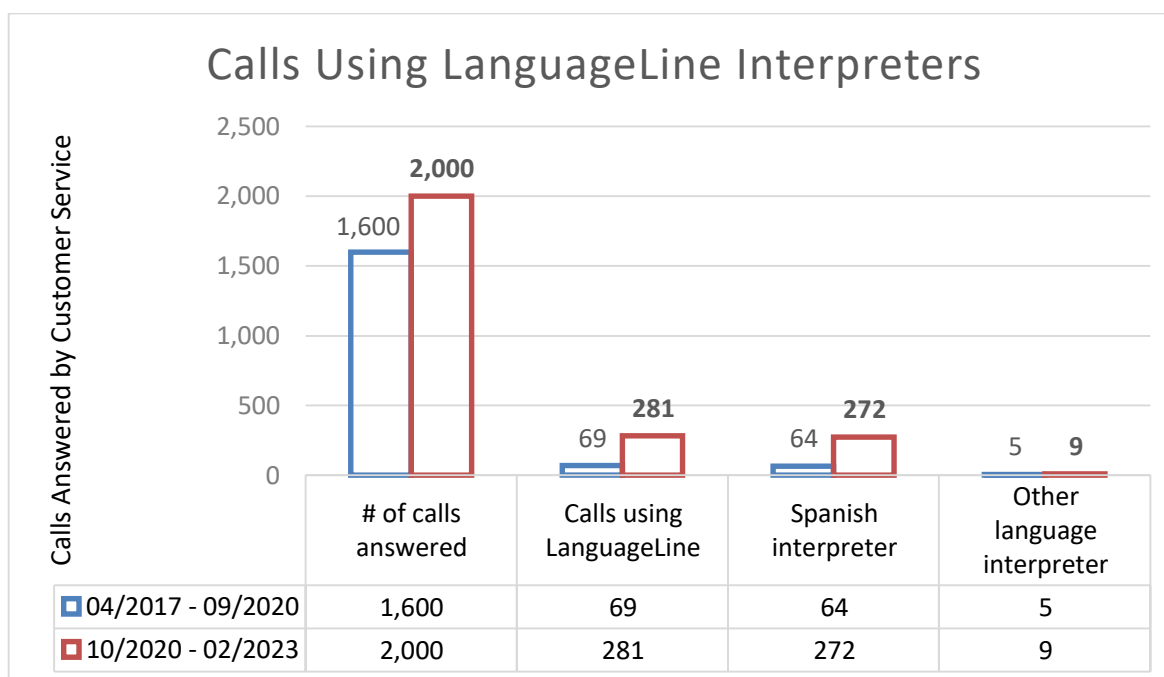
#### 2.4. Encounters with RTS

##### 2.4.A. Tracked Telephone Interaction

Customer Service Representatives use a telephone interpreter service (LanguageLine® PhoneSM) when LEP customers call with questions. The invoices from this service show the following information.



## LANGUAGE ASSISTANCE PROGRAM: FOUR-FACTOR ANALYSIS 2023 RESULTS



Possible reasons for the significant increase in calls requiring language assistance between the 2017-2020 reporting period and the 2020-2023 reporting period include:

- Shifts in ridership during the pandemic.
- Implementation of the new transit system in May 2021.
- Consistent efforts to train Customer Service Representatives to use LanguageLine® PhoneSM.

### 2.4.B. Tracked Face-to-Face Interaction (Informal)

RTS Operators contact Radio Control when a customer needs language assistance. Radio Controllers log these instances in the CAD/AVL application (OrbCAD) under “LEP Issue.” The incident entries remain in a report for 12 months. From July 2020 to December 2022, no LEP events or requests were logged. It is possible that Operators are requesting Road Supervisors, using the Contact Us business cards, or directing LEP customers to RTS Transit Center staff.

RTS has a small number of Spanish-speaking Operators, Road Supervisors, and Customer Service Representatives. This staff does not report their interactions with Spanish-speaking LEP customers.

### 2.4.C. Tracked Face-to-Face Interaction (Formal)

The Customer Survey vendor supplies personnel to interview customers across RTS fixed routes every three months. The questionnaire is in English, and the personnel do not necessarily speak a language other than English. These factors may limit LEP participation.

The results of the Customer Survey data for the last 3 years (Waves 38-49) include the responses to “What is the primary language spoken in your home?” and “How often do you ride the bus?” Those who did not indicate English is their primary language tended to ride less frequently than those who did.

	Frequency of Riding the Bus				
	5+ days per week	3-4 days per week	1-2 days per week	< 1x weekly, but > 1x monthly	Once a month or less
<i>Indicated English is their primary language (only those responding)</i>	63.97%	21.81%	8.31%	2.98%	2.93%



## LANGUAGE ASSISTANCE PROGRAM: FOUR-FACTOR ANALYSIS 2023 RESULTS

<i>Did not indicate that English is their primary language (only those responding)</i>	60.14%	21.71%	5.07%	7.97%	5.10%
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Throughout 2020-2023, RGRTA provided interpreter (ASL, Spanish) at seven Customer Open Houses. The open houses covered proposed service changes, technology improvements, and recruited for jobs at RTS.

Date	Event	Provider
8/26/2021	Customer Open House at the RTS Transit Center	Sign Language Connection  Spanish-speaking RTS staff
12/15/2021	Customer Open House at the RTS Transit Center	
03/23/2022	Customer Open House at the RTS Transit Center	
06/14/2022	Customer Open House at the RTS Transit Center	
08/24/2022	Customer Open House at the RTS Transit Center	
12/13/2022	Customer Open House at the RTS Transit Center	
03/08/2023	Customer Open House at the RTS Headquarters and on Zoom	

### 2.4.D. Tracked Machine Interactions

RTS has five ticket vending machines (TVM) for purchasing bus fare media. Four VenTek NextGen TVMs are located at the RTS Transit Center at 60 Saint Paul Street, and one is located at 1372 East Main Street in lobby of the Administration building. All machines have an option to select Spanish language audio and digital display. RTS does not yet have an accurate method for tracking how often users select the Spanish option.

### 2.4.E. Tracked Requests for Translated Written Materials

In 2021, RTS provided an “Enjoy the Ride Guide” brochure, a list of “old routes to new routes” and an RTS Go brochure in Spanish for the launch of the new transit system (Reimagine RTS). These materials were distributed to over 40 organizations that participated in “Train-the-Trainer” events, but it is unknown how many Spanish versions the organizations distributed by request. One paratransit customer requested their written eligibility determination letter in Spanish in 2022.

### 2.4.F. Tracked Survey Interactions

The quarterly RTS Connect onboard Customer Survey from the last 3 years provides a sample size of 6,237 participants. Consistently, an average of 7.75% of those participants speak Spanish at home (or 40 people per survey wave).

From March 28 to May 1, 2022, the American Bus Benchmarking Group (ABBG) conducted a customer survey in addition to the onboard RTS Customer Survey. The American Bus Benchmarking Group is a consortium of medium sized bus agencies in North America that benchmark performance and share best practices for fixed route and paratransit services. The survey was provided electronically on self-serve kiosks at the RTS Transit Center and online through a link on [www.myRTS.com](http://www.myRTS.com). The survey was available in English and Spanish. A total of 706 people participated in the survey.

## 2.5. Encounters with Regional Business Units

Each Regional has route-deviated and/or demand responsive (Dial-a-Ride) routes with schedules that do not change frequently. Most bus schedules are translated to Spanish and posted on [www.myrts.com](http://www.myrts.com).

Regional Property	Spanish Schedules	Details
RTS Genesee	0	Schedules not translated <a href="https://www.myrts.com/Maps-Schedules/RTS-Genesee">https://www.myrts.com/Maps-Schedules/RTS-Genesee</a>
RTS Livingston	2	Updated in 2020 & 2017 <a href="https://www.myrts.com/Livingston/Schedules">https://www.myrts.com/Livingston/Schedules</a>





## LANGUAGE ASSISTANCE PROGRAM: FOUR-FACTOR ANALYSIS 2023 RESULTS

Regional Property	Spanish Schedules	Details
RTS Ontario	7	Updated in 2022, 2021, & 2018 <a href="https://www.myrts.com/Ontario/Maps-and-Schedules">https://www.myrts.com/Ontario/Maps-and-Schedules</a>
RTS Orleans	2	Updated in 2021 & 2017 <a href="https://www.myrts.com/Orleans/Schedules">https://www.myrts.com/Orleans/Schedules</a>
RTS Seneca	1	Updated in 2022 <a href="https://www.myrts.com/Seneca/Schedules">https://www.myrts.com/Seneca/Schedules</a>
RTS Wayne	5	Updated in 2021 & 2018 <a href="https://www.myrts.com/Wayne/Schedules">https://www.myrts.com/Wayne/Schedules</a>
RTS Wyoming	4	Updated in 2022 & 2021 <a href="https://www.myrts.com/Wyoming/Schedules">https://www.myrts.com/Wyoming/Schedules</a>

### 2.6. Frequency with Which LEP Persons Encounter RGRTA Services

For this segment of the analysis, RGRTA's suppositions are as follows:

- A. Based on the Customer Survey demographic results, ACS PUMA data, and the number of Spanish-speaking personnel, the LEP persons most likely to interact with RGRTA services speak Spanish.
- B. Based on the LEP populations located in RGRTA service areas, RTS Genesee / RTS Orleans, RTS / RTS Access, and RTS Ontario have the highest potential to interact with Spanish-speaking LEP populations.
- C. Many LEP interactions are not tracked, such as conversations between Spanish-speaking staff and Spanish-speaking LEP customers.
- D. Based on the available tracked interactions, RGRTA rates frequency with which LEP persons encounter its services as Occasional (41-60%).

### 3. The nature and importance of programs, activities, or services provided by RGRTA to the LEP population.

Exhibit B—RTS Customer Survey Results provides supporting evidence for the third part of the analysis. In the absence of data that is contrary or more robust, RGRTA will consider these results as reflective of the nature and importance of its services to LEP persons.

- **Nature of Activities/Service:** According to the Customer Survey results, most people use RTS fixed route service because they do not have a car.
- **Importance of Activities/Service:** On-time performance (ability to reach destinations on time, such as a job or appointment), route coverage (availability of bus service to destinations throughout the area) and bus frequency (headway times of every 15 minutes or every 30 minutes).

### 4. The resources available to RGRTA and overall cost to provide LEP assistance.

#### 2.7. Bilingual Personnel

RGRTA has 79 bilingual personnel. Most speak English and Spanish dialects. Other languages are represented, including dialects of Chinese, Arabic, Indo-Aryan, Turkic, and Indo-European languages. Most of the personnel work at RTS or RTS Access in Monroe County. Two Bus Operators and one Bus Washer work in Ontario County.

50 Bus Operators and Small Vehicle Operators*	1 Manager of Transit Center Operations
3 Road Supervisors	1 Customer Relationship Marketing Specialist
2 Customer Service Representatives	1 Data Scientist/Business Intelligence Developer
3 Bus Washers	1 Supervisor of Employee Well-being & Engagement
5 Radio Controllers	1 Director of Paratransit Services
4 Vehicle Technicians	1 Administrative Assistant, RTS Access
1 Chief Executive Officer	1 RTS Access Scheduler
1 Human Resources Specialist	1 RTS Access Dispatcher
1 Garage Supervisor	1 RTS Access Purchasing Clerk

\*estimated

**RGRTA****LANGUAGE ASSISTANCE PROGRAM: FOUR-FACTOR ANALYSIS 2023 RESULTS**

While the Spanish/English bilingual staff may act as a resource for LEP customers, they were not hired based on their ability to speak Spanish. As a result, their compensation does not factor into the cost of LEP assistance.

## 2.8. Professional Telephonic Interpreting Service

RGRTA uses LanguageLine® PhoneSM Interpreting, which allows staff to connect with an interpreter when an LEP person calls RTS Customer Service, RTS Legal Affairs, RTS Access Scheduling/Dispatch, or any subsidiary company's main office.

From June 2017 to September 2020, RTS Customer Service used LanguageLine® for 64 calls in Spanish, 1 call in Hungarian, 1 call in Somali, and 3 calls in Haitian Creole at a cost of \$2,875.60.

From October 2020 to February 2023, the usage and cost increased dramatically to 272 calls in Spanish, 1 call in Arabic, 4 calls in Vietnamese, 1 call in Dari, and 3 calls in Mandarin Chinese at a cost of \$11,629.97.

Instructions for accessing LanguageLine are provided to all relevant personnel. RTS Connect and RTS On Demand Operators carry "Contact Us" cards to provide assistance to literate LEP individuals during business hours. If more assistance is needed, the Operator can request a Road Supervisor.



Road Supervisors are given cards with instructions for using LanguageLine®.





## LANGUAGE ASSISTANCE PROGRAM: FOUR-FACTOR ANALYSIS 2023 RESULTS

### 2.9. Professional Translation Service

RGRTA uses the local agency Language Intelligence® <http://www.languageintelligence.com/services/translation-services/> to provide professional translation for printed documents. From 2020-2023, Language Intelligence translated the material for three customer-facing documents from English to Spanish for the United States (a general form of Spanish that covers multiple locales without sounding localized for a specific population). According to the Director of Client Services at Language Intelligence, a mix of Mexican, Puerto Rican, and Latin American Spanish speakers live in the Rochester area. The translation rate for Spanish is \$0.22/word. The cost per word decreases over time due to the company's use of translation memory technology.

From 2020-2023, the following vital documents were translated to support LEP persons who can read Spanish.

- Notice to the Public of Rights Under Title VI (poster format, interior card, online, vehicle decals)  
*Updated in 2022 to include instructions on how to request information about our obligations under Title VI.*
- 2021 Revised Application for Paratransit Eligibility Certification
- Application for Temporary Paratransit Eligibility
- Renewal for All-Trip Paratransit Eligibility Certification
- RTS On Demand Guide
- RTS On Demand Quick Guide
- 21 Maps and Bus Schedules for Subsidiaries  
*RTS Livingston (2), RTS Ontario (7), RTS Orleans (2), RTS Seneca (1), RTS Wayne (5), and RTS Wyoming (4)*

**Due to the number of fixed routes (32) and quarterly schedule changes, RTS fixed route bus schedules are offered in English and will be translated upon request. During the program period, none of the fixed route schedules were requested in another language.**

#### 2.9.A. Spanish Materials for RTS Go Fare System

RTS used the local agency Language Intelligence to translate the mitigation plan.

- [RTS Go Fare System: Mitigations for Low-Income Customers](#)
- [https://myrts.com/Portals/0/Documents/Board/Audit%20Committee/RTS%20Go%20Mitigation%20Text%20es\\_US.pdf?ver=2020-06-25-150412-760](https://myrts.com/Portals/0/Documents/Board/Audit%20Committee/RTS%20Go%20Mitigation%20Text%20es_US.pdf?ver=2020-06-25-150412-760)

RTS directed the vendor for the mobile ticketing technology (Masabi) to provide customer-facing material in Spanish.

- <https://myrts.com/RTS-Go> > <https://myrts.com/Portals/0/RTS-How-to-Posterboard-V6-Spanish.pdf>
- The VenTek NextGen ticket vending machines at the RTS Transit Center and at the RTS Administration Building (RGRTA Headquarters) include a language option for Spanish.

### 2.10. Machine Translation

The text on the [www.myrts.com](http://www.myrts.com) website is available in other languages through individually initiated machine translation of website content.

Machine translation is available for most web browsers. The free Microsoft Translator App is available through the Window Store, the Apple Store, Google Play, and Amazon. It works with the following platforms, apps, and browsers.

Platform	App	Browser
Android	Phones, Tablets, Kindle Fire tablets, Chromebooks	Chrome, Firefox



## LANGUAGE ASSISTANCE PROGRAM: FOUR-FACTOR ANALYSIS 2023 RESULTS

Platform	App	Browser
iOS	iPhone, iPad	Safari, Chrome, Firefox (text input only; no speech)
Windows 10	PC, Mobile, Surface Hub, HoloLens	PC: Chrome, Edge, Firefox

The settings in Google Chrome allow people to select specific languages to translate. After picking Spanish as a language, the readers can right-click on any page and select **Translate to español**. For LEP persons with limited literacy can apply language assistive technology to speak the text. Google has an extension called GoogleVox.

Machine translation is also available on Android and Apple smart devices (smartphones, pads). When users modify the language setting on their device, the setting changes the language shown in apps like the *Transit* app. Customers use the *Transit* app to get trip information, reserve On Demand trips, or manage their RTS Go fare account.

The RTS Community Engagement Manager includes the topic of using technology settings on smart devices as a talking point in training sessions with community outreach partners.

The following recorded videos and webinars provide language options and closed captioning through the captioning function on YouTube.

Item	Date
Schedule changes preview video (available in CC and multiple language translations via captions) Posted to myRTS.com, shared via email & social media. Link: <a href="https://youtu.be/ygp0_QHwqSU">https://youtu.be/ygp0_QHwqSU</a>	8/13/2021
Schedule changes preview video (available in CC and multiple language translations via captions) Posted to myRTS.com, shared via email & social media <a href="https://www.youtube.com/watch?v=xYBVSEBG1kE">https://www.youtube.com/watch?v=xYBVSEBG1kE</a>	3/15/22
Reimagine RTS Launch webinar (available in CC and multiple language translations via captions) Posted to myRTS.com, via email & social media <a href="https://www.youtube.com/watch?v=VuIFGGaU7j0">https://www.youtube.com/watch?v=VuIFGGaU7j0</a> <i>This session was held online so people could learn more about the new system without having to worry about COVID-19. All the information covered in the webinar was available on myRTS.com and in print at the RTS Transit Center in English and Spanish.</i>	4/27/21
How to request a trip with RTS On Demand/Via account video (available in CC and multiple language translations via captions) Posted to myRTS.com, via email & social media <a href="https://youtu.be/hqpUGJsz5A8">https://youtu.be/hqpUGJsz5A8</a>	9/21/22
How to ride 101 video (available in CC and multiple language translations via captions) Posted to myRTS.com, via email & social media <a href="https://youtu.be/SuOWkvYOqw0">https://youtu.be/SuOWkvYOqw0</a>	8/3/22

### 2.11. In-person Interpreting

RTS engaged the services of Sign Language Connection to provide ASL interpreters at in-person Customer Open Houses. Spanish-speaking staff provided Spanish interpretation as needed (RTS Customer Relationship Marketing Specialist).





## LANGUAGE ASSISTANCE PROGRAM: CONCLUSIONS

### 2.12. Braille Transcriptions

Braille is vital to literacy for the blind. RGRTA has adopted the practice of treating braille as another form of language assistance for customers. RGRTA will engage braille transcription vendors (Metrolina Association for the Blind and BrailleWorks) to create electronic files compatible with embosser machines. RGRTA distributes the electronic files to local organizations with onsite embossers, such as the Association for the Blind and Visually Impaired and the Rochester Chapter of the National Federation of the Blind. The organizations can emboss documents in braille coded English. This allows braille readers as well as primary advocates to access the information and relay it to other individuals who may not read braille. RGRTA procured did not procure braille transcriptions during the 2020-2023 program period.

### 2.13. Resources and Overall Costs

The resources available to RGRTA include bilingual personnel, professional telephonic interpreting services, and professional translation (print) or interpreting (in-person) services.

From 2014-2017, RGRTA spent \$6106.68 on professional on-demand phone interpreting and professional translation of vital documents. The majority of this spend was to provide LEP assistance in Spanish.

From 2017-2020, RGRTA spent at least \$34,417.27 on professional telephonic interpreting services, translation services, in-person interpreting services, and braille transcription. The increase was due to the educational materials provided during the public participation and planning of Reimagine RTS.

From 2020-2023, RGRTA spent at least \$14,987.99 on professional telephonic interpreting services, translation services, in-person interpreting services. Most of the cost is from increased usage of LanguageLine®.

## 3.0 Conclusions

No one LEP population exceeds 5% in the RGRTA service area. LEP Spanish-speakers in the entire Monroe County population (over 700K in the RTS service area) comprise the largest LEP population at 2.0%. RGRTA is aware of customers who may read Spanish and engages in efforts to provide Spanish vital documents. The entire RGRTA service area contains enough LEP Spanish-speakers to justify directing resources toward proactive assistance for Spanish speakers. RGRTA will monitor variances in the populations speaking Spanish, Chinese, Nepali, Italian, and Arabic. RGRTA will work with its Customer Survey vendor (Level7) to investigate ways of accessing specific data regarding the LEP customers, particularly those who are Spanish speaking and experience difficulty navigating the current system. As RGRTA continues to build internal solutions for gathering and analyzing data, the departments involved in analyzing language assistance activities will consider the following questions:

- “What can improve the ability of LEP customers to navigate the system?”
- “Which LEP populations in the area use public transit with high frequency?”
- “What is the literacy level of LEP Spanish-speakers in the RGRTA service areas?”
- “How can we provide information to LEP Spanish-speakers more effectively? What do they want to know?”

## 4.0 Plan Outline for 2023-2026

### 4.1. Ongoing Assessment of the Need for LEP Resources and Services

Every three years, the results of the most current four-factor analysis will be shared with Communications, Customer & Community Engagement, Service Planning, and Transportation Services. The Legal Affairs and Communications departments will meet biennially in November and May to evaluate language assistance tasks.

### 4.2. Ways of Providing Language Assistance

RGRTA will continue the following practices:

1. The RTS website [www.myrts.com](http://www.myrts.com) notifies customers that they may call (585) 288-1700 for assistance in Spanish (“Para atención en Español, por favor llamar al (585) 288-1700”);



## LANGUAGE ASSISTANCE PROGRAM: PLAN OUTLINE FOR 2023-2026

2. The RTS website [www.myrts.com](http://www.myrts.com) includes a section about LanguageLine Personal Interpreter Services, and explains that it is a free service for non-English speakers to communicate with RTS Customer Service Representatives and RTS Access Schedulers. Visitors are instructed to call 585-288-1700 for RTS or 585-244-8330 for RTS Access;
3. When the services of an interpreter are needed, staff will attempt to determine what languages are required and engage professional interpreter services, particularly for ASL and languages other than Spanish. When appropriate, Spanish-speaking RTS staff will provide interpretation support.
4. Due to the proportion of Spanish-speaking LEP persons in the service area who may be served by or are likely to encounter an RGRTA program, activity, or service, RGRTA will take the measures described for the vital documents listed below.

### 4.2.A. Title VI Complaints

1. Complaint form in Spanish and English (available for download [www.myRTS.com](http://www.myRTS.com))
2. Summary of complaint process in Spanish and English (available for download [www.myRTS.com](http://www.myRTS.com))
3. Message on the website that explains how people can request language assistance (translation or interpreter) ([www.myRTS.com](http://www.myRTS.com))
4. Title VI Notice to the Public in Spanish and English
  - a. Poster on Bulletin Board in 1372 East Main Street, Administration Building lobby
  - b. Poster by Customer Information Desks at the RTS Transit Center, 60 St. Paul Street
  - c. Decals on the interior of all buses
  - d. Message on digital display monitors at the RTS Transit Center concourse gates on a quarterly basis in Spanish and English

### 4.2.B. Paratransit Eligibility

1. Application for Paratransit Eligibility Certification in Spanish and English (available for download [www.myRTS.com](http://www.myRTS.com))
2. Message on the website that explains how people can request language assistance (translation or interpreter) ([www.myRTS.com](http://www.myRTS.com))
  - a. If Spanish or another language is requested during the application process, the corresponding Eligibility Determination Letter will be provided in that language, as well as any further communication regarding eligibility including the appeal process.

### 4.2.C. Bus Schedules

All RTS Monroe schedules include the following statement “We are happy to provide schedules in other languages. Please call RTS at 585-288-1700.” If such a request is received, RTS will engage the services of its local translation agency, Language Intelligence to provide the requested translation in a reasonable time. Schedules RTS Livingston, RTS Ontario, RTS Orleans, RTS Seneca, RTS Wayne, and RTS Wyoming will continue to be provided in Spanish and English (available for download on [www.myRTS.com](http://www.myRTS.com)). RTS Genesee schedules will be flagged for Spanish translation during 2023.

### 4.2.D. Public Participation

Meetings notices shall offer language assistance upon request. Interpreters require 3 days advance notice. If the event is designed to educate customers about the transit system or to gather input about language assistance, in-person language interpreters will be available.

### 4.2.E. Notices About Schedule Changes, Route Overhauls, or Service Changes

Notices shall be provided in Spanish and English; for more detailed or complex changes, the Spanish notice shall direct customers to call 585-288-1700 for assistance. A message shall be posted on the page that





## LANGUAGE ASSISTANCE PROGRAM: PLAN OUTLINE FOR 2023-2026

explains how people can request language assistance (translation or interpreter) ([www.myRTS.com](http://www.myRTS.com)).

### 4.3. Outreach Techniques

The Customer Survey data for Waves 38 to 49 shows that roughly two out of ten customers have difficulty navigating the existing fixed route system because of language.

RTS could request that its survey vendor (Level7) extract specific data points. For example, if the average totals show that 32% of participants answer “Yes” to the question “Does use of English language pose a difficulty in navigating the RTS system?” RTS could request the vendor to provide a report that identifies how that same 32% answers the question “What is the primary language in your home?”

For those participants who select a language other than English, the report would show the trends for responses to the following questions:

- “What zip code do you live in?”
- “How often do you ride the bus?”
- “How long have you been using RTS service?”

The goal is to assist RTS in learning more about the LEP populations it is currently interacting with and improving their ability to navigate the system.

Understanding zip code areas could help Customer and Community Engagement to identify local organizations connected with LEP populations and conduct tailored outreach to better understand the difficulties and learn what the customers’ needs are.

### 4.4. Staff Training

Every May and November, Customer Support Representatives, RTS Access Schedulers, and Regional Managers will receive reminders and refreshers on the following topics:

1. Using Language Line telephone interpreter services.
2. Materials available in Spanish and where to locate them.

The Regional Managers will be provided the instructions for using LanguageLine® and reminded that telephonic interpreter services are available to assist them in supporting LEP customers at any of the subsidiary locations.

Legal Affairs will recommend that Workforce Development periodically cover the topic of interacting with LEP customers during Operator in-service training.

### 4.5. Monitoring & Updating the Limited English Proficiency & Language Assistance Program

Legal Affairs coordinate revisions to the LAP as required by the FTA based on the four-factor analysis; or when data from the ACS is updated; or they become aware of an increased population or increased need.

Updates will consider the following:

- |   |   |
|---|---|
| 1. The number of tracked interactions with LEP persons.                                     | 6. Whether RGRTA’s financial resources are sufficient to fund desirable language assistance resources.        |
| 2. How the needs of LEP persons have been addressed.  | 7. Whether RGRTA complied with the goals of this LAP.   |
| 3. The current LEP population in the service area.  | 8. Whether complaints have been received concerning the RGRTA’s failure to meet the needs of LEP individuals. |
| 4. Whether the need for translation services or publication of vital documents has changed. |   |
| 5. Whether local language assistance programs have sufficiently met the need.               |   |



## **LANGUAGE ASSISTANCE PROGRAM: DISSEMINATION OF RGRTA'S LIMITED ENGLISH PROFICIENCY LANGUAGE ASSISTANCE PLAN**

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### **4.6. Budget**

For 2023-2024, Customer Service has budgeted \$12,000 for LanguageLine® PhoneSM services and Legal Affairs has budgeted \$12,000 for language translations and braille transcriptions. In-person ASL and other language interpreters' costs are covered as part of the Communications budget for public engagement activities.

### **5.0 Dissemination of RGRTA's Limited English Proficiency Language Assistance Plan**

The LAP will be posted on the company Intranet in the Policies and Procedures system. The LAP will be included with RGRTA's Title VI Program Plan and submitted to the FTA every three years. RGRTA's commitment to provide language assistance upon request will be posted on its public website [www.myRTS.com](http://www.myRTS.com).



**LANGUAGE ASSISTANCE PROGRAM: DISSEMINATION OF RGRTA'S LIMITED ENGLISH PROFICIENCY  
LANGUAGE ASSISTANCE PLAN**

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EXHIBITS

EXHIBIT A— LEP POPULATION DATA .....21

EXHIBIT B— RTS CUSTOMER SURVEY RESULTS .....27

EXHIBIT C— SAMPLES OF SPANISH TRANSLATIONS.....55

## EXHIBITS

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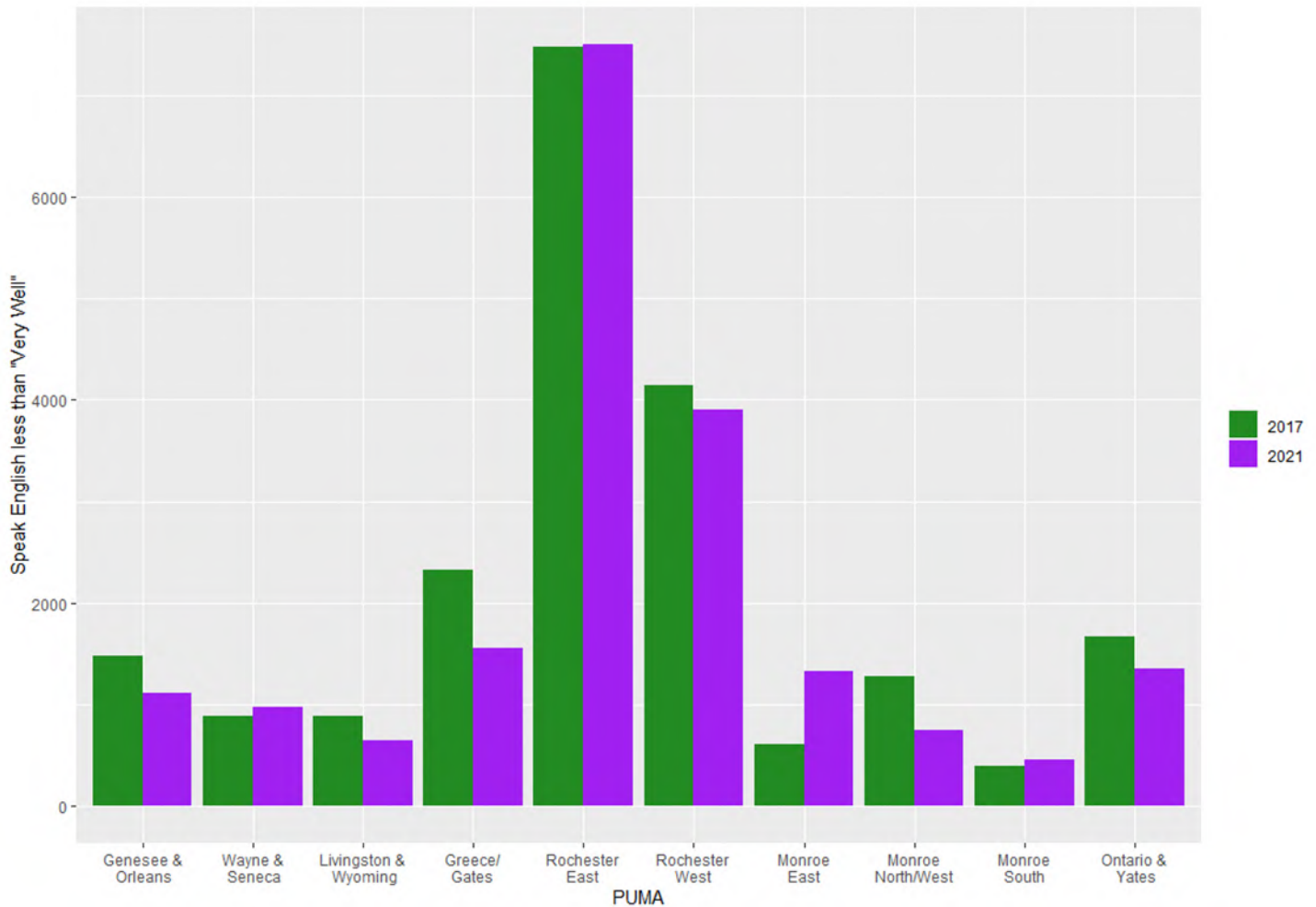
# Exhibit A—LEP Population Data

## RGRTA LAP EXHIBIT A—LEP POPULATION DATA

This Exhibit to the RGRTA Limited English Proficiency Language Assistance Plan, 2023-2026 shows the population changes for LEP speakers in the RGRTA service area by comparing ACS 5-year data from 2021 with ACS 5-year data from 2017.

### 1.0. Spanish Speaking Populations

LEP Spanish speakers decreased in Monroe County overall, with much of that change being in the Greece/Gates PUMA. The Genesee & Orleans and Ontario & Yates PUMAs also had decreases in LEP Spanish speakers.

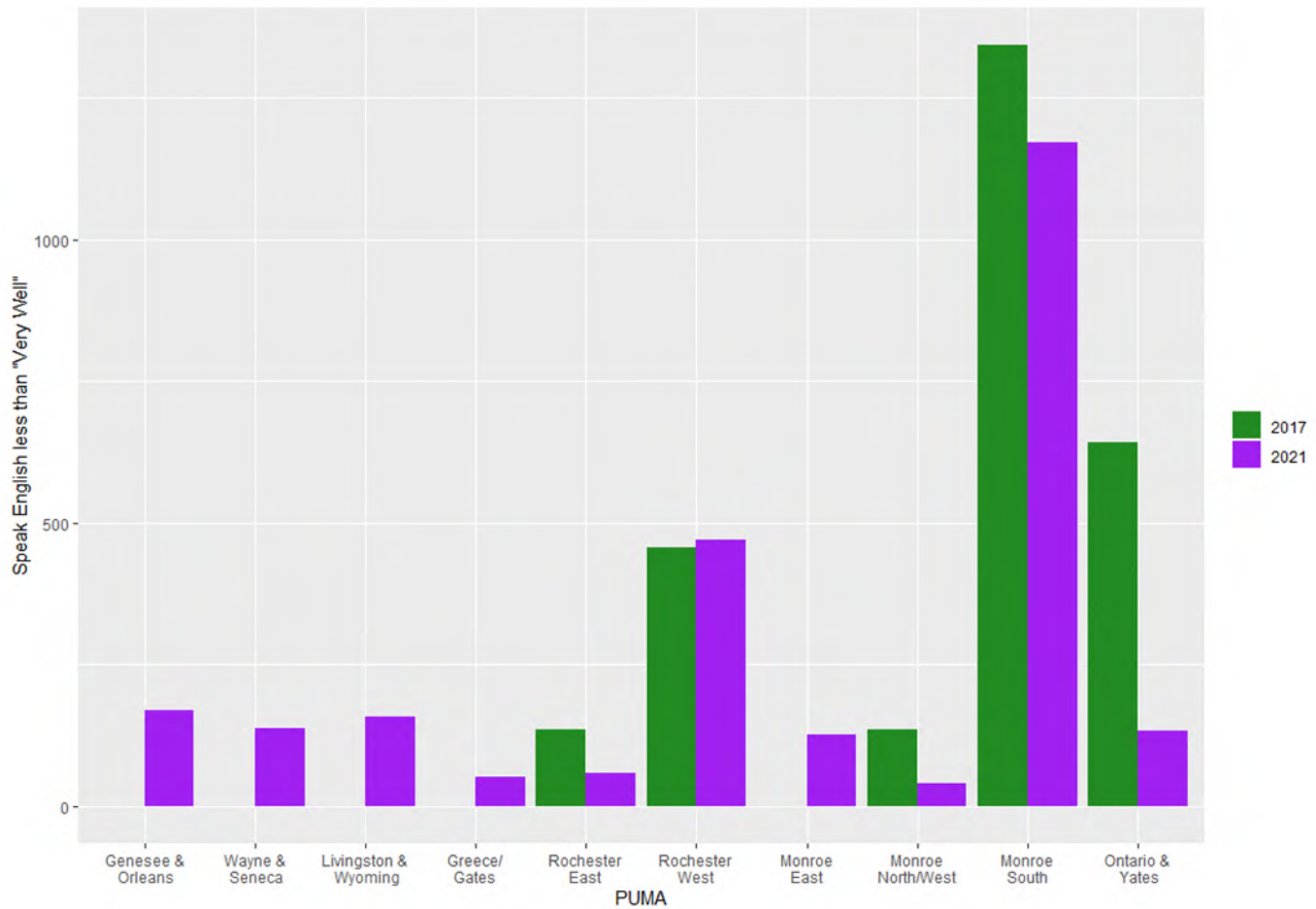




## RGRTA LAP EXHIBIT A—LEP POPULATION DATA

### 2.0. Chinese Speaking Populations

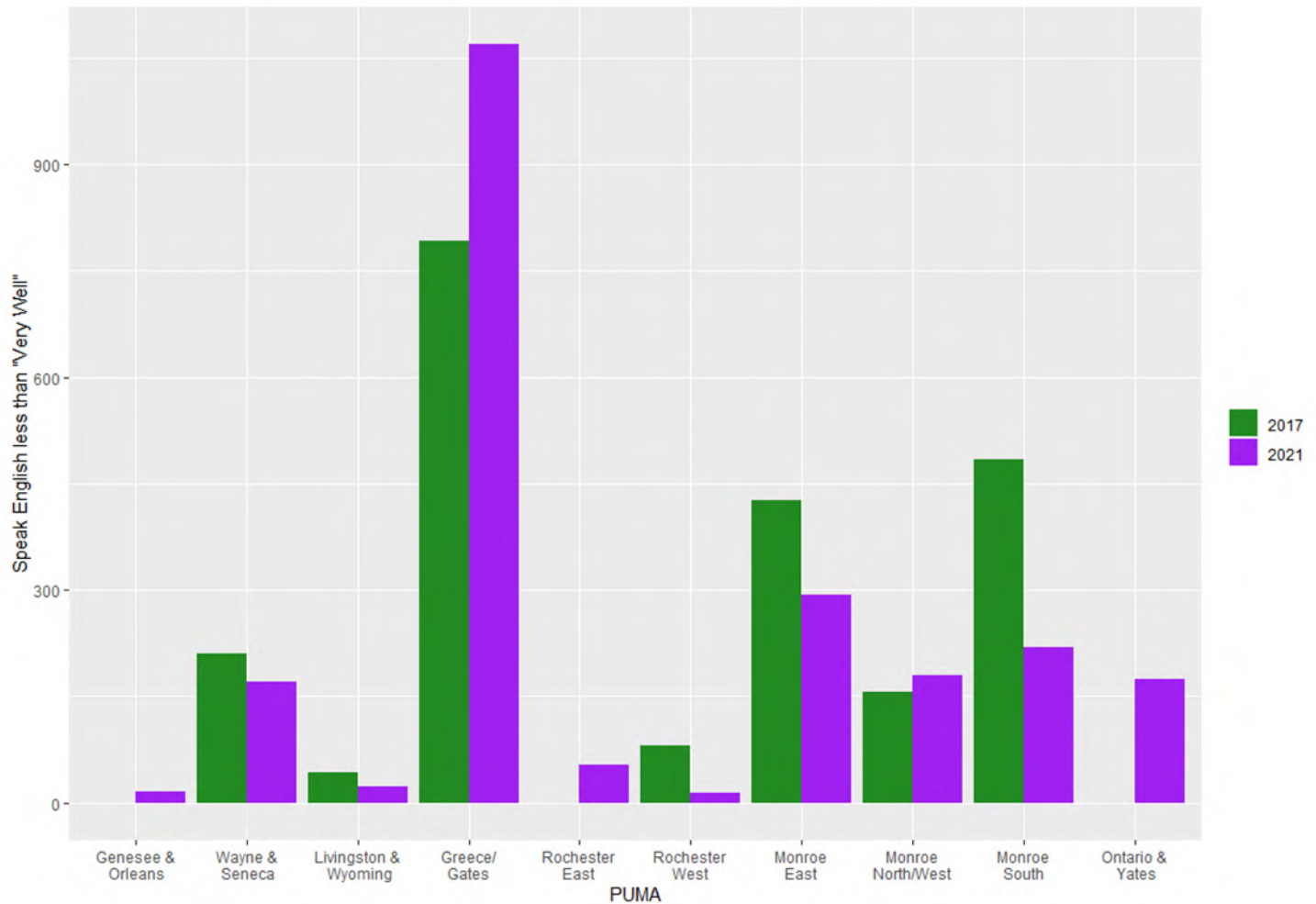
LEP Chinese speakers decreased in Monroe County, with the Monroe South PUMA responsible for most of the decline. There was a large decrease in the Ontario/Yates PUMA.



## RGRTA LAP EXHIBIT A—LEP POPULATION DATA

### 3.0. Italian Speaking Populations

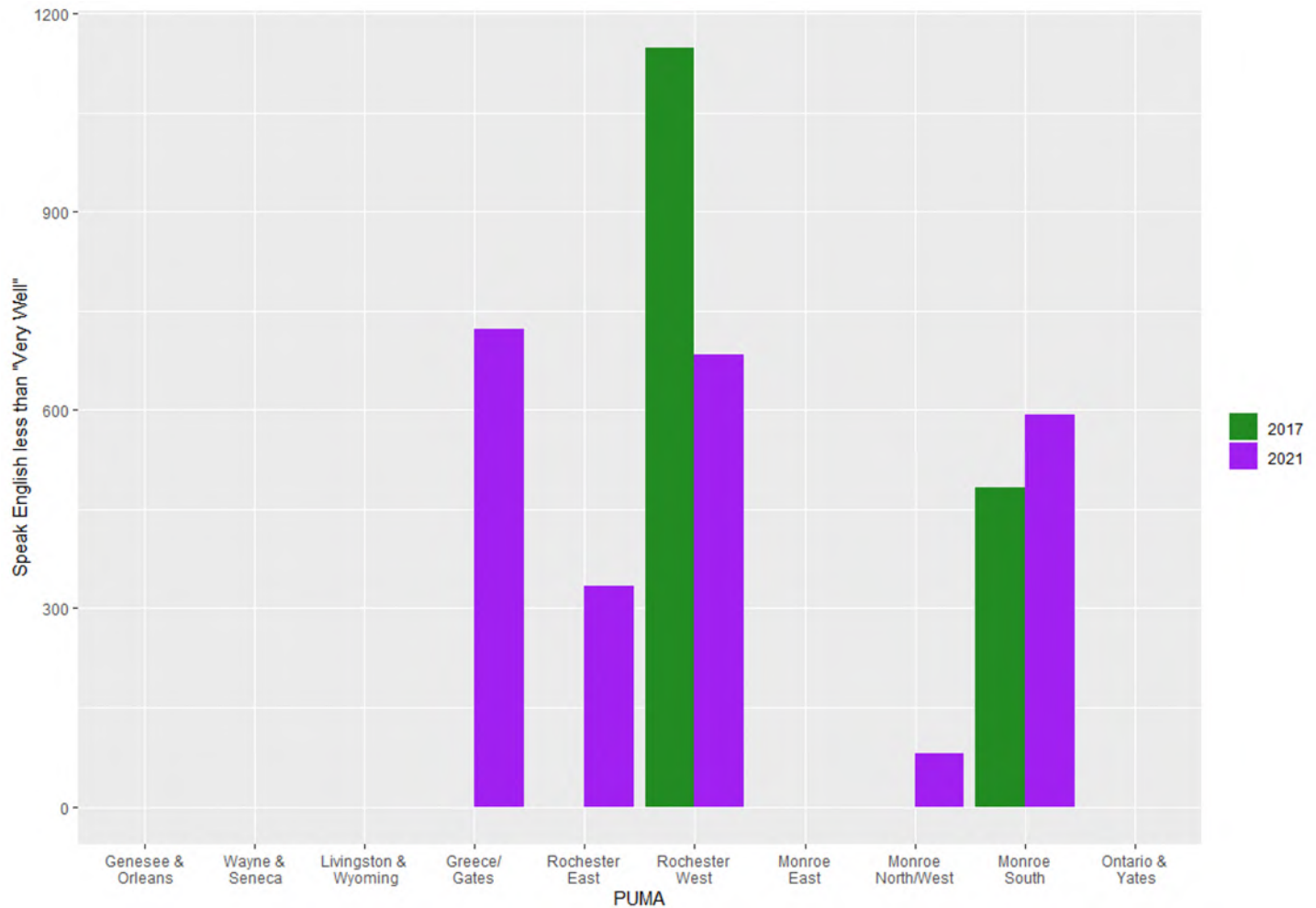
LEP Italian speakers decreased in Monroe County, particularly in the Monroe East and Monroe South PUMAs. There was a notable increase in the Greece/Gates PUMA. LEP Italian speakers also increased in the Ontario & Yates PUMA.



## RGRTA LAP EXHIBIT A—LEP POPULATION DATA

### 4.0. Nepali Speaking Populations

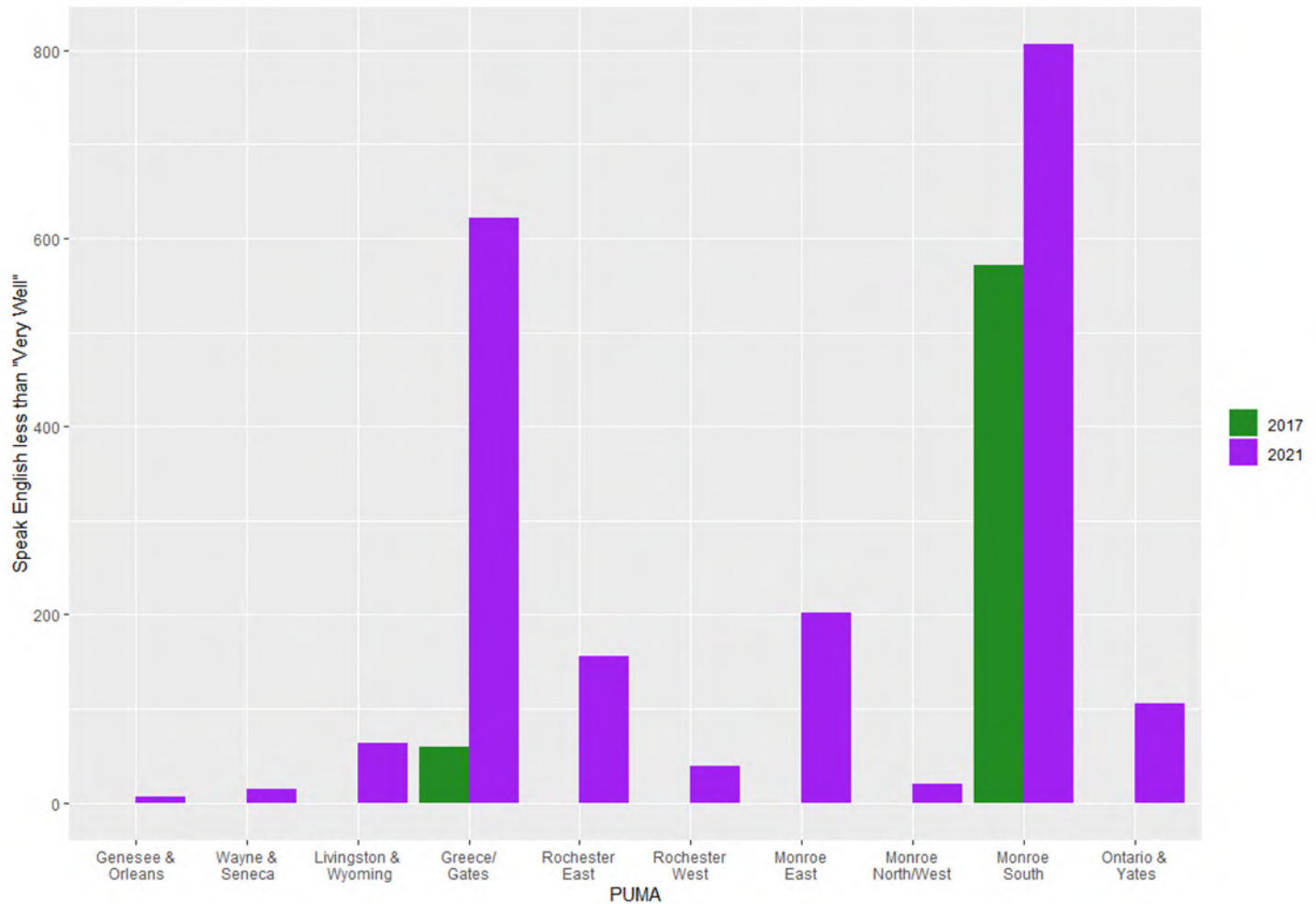
LEP Nepali speakers are only found in Monroe County. This population has grown overall, with much of the growth coming in the Greece/Gates and Rochester East PUMAs. There has been a decrease in the Rochester West PUMA.



## RGRTA LAP EXHIBIT A—LEP POPULATION DATA

### 5.0. Arabic Speaking Populations

LEP Arabic speakers have increased in Monroe County, primarily in the Greece/Gates PUMA. The Monroe South, Monroe East, and Rochester East PUMAs have also seen notable increases.



## EXHIBITS

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# Exhibit B—RTS Customer Survey Results





13) Based on your experience over the last 3 months, how strongly do you agree with the following statements  
(1=Strongly Disagree, 10=Strongly Agree).

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When RTS makes changes to its service, I trust those changes will help me.	①	②	③	④	⑤	⑥	⑦	⑧	⑨	⑩
RTS's priority is improving transportation for the entire Rochester community.	①	②	③	④	⑤	⑥	⑦	⑧	⑨	⑩
RTS acknowledges my input when I give it.	①	②	③	④	⑤	⑥	⑦	⑧	⑨	⑩
RTS seeks out my opinion before making changes that affect me.	①	②	③	④	⑤	⑥	⑦	⑧	⑨	⑩
This survey is helping to improve RTS.	①	②	③	④	⑤	⑥	⑦	⑧	⑨	⑩
RTS is always looking for new ways to improve public transit for the community.	①	②	③	④	⑤	⑥	⑦	⑧	⑨	⑩

14) What aspects of service and/or performance do you think RTS needs to improve upon?

15) What are your pronouns? ☐ He/Him ☐ She/Her ☐ Them/They  
☐ Prefer not to say ☐ I identify as: \_\_\_\_\_

16) What is your age? \_\_\_\_\_

17) Racially/ethnically, how do you identify? **(Check all that apply)**

- ☐ Asian ☐ American Indian/Alaskan Native  
☐ Hispanic/Latin ☐ Black or African American  
☐ White ☐ West Indian/Caribbean  
☐ Middle Eastern ☐ Other \_\_\_\_\_

18) What is the primary language spoken in your home?

- ☐ English ☐ Italian ☐ Spanish  
☐ Chinese ☐ Vietnamese ☐ Hindu-Urdu  
☐ Other \_\_\_\_\_

19) What zip code do you live in? \_\_\_\_\_

20) Does use of the English language pose a difficulty in navigating the RTS system? **(Check all that apply)**

- ☐ Yes **(Reading)** ☐ Yes **(Speaking)** ☐ No

21) Do you have a condition that makes transportation difficult for you? ☐ Yes ☐ No

22) What is your total annual income level?

- ☐ Under \$15K ☐ \$25K - \$50K ☐ Above \$75K  
☐ \$15K - \$25K ☐ \$50K - \$75K

23) What is your occupational status?

- ☐ Employed Full-time ☐ Employed Part-time  
☐ Self-employed ☐ Unemployed  
☐ Student (Full-time) ☐ Student (Part-time)  
☐ Contract ☐ Other \_\_\_\_\_  
☐ None of the above

24) Are you currently a member of student/staff/faculty at any of the following institutions?

- ☐ SUNY Brockport ☐ St. John Fischer  
☐ MCC - Brighton ☐ U of R - Eastman  
☐ MCC - Downtown ☐ U of R - Medical/Mid-Campus  
☐ Nazareth College ☐ U of R - River Campus  
☐ RIT ☐ U of R - South Campus  
☐ Other \_\_\_\_\_ ☐ None of the above

25) Including yourself, how many people live in your household?

- ☐ 1 ☐ 3 ☐ 5  
☐ 2 ☐ 4 ☐ 6+

26) How many motor vehicles (cars, vans, trucks, motorcycles) in your household are available for you to use?

- ☐ 1 ☐ 3 ☐ 5+  
☐ 2 ☐ 4 ☐ None

27) How long are you on the bus for this trip? (In minutes)

- ☐ Less than 5 ☐ 5-10 ☐ 10-15  
☐ 15-20 ☐ 20-25 ☐ 25+

28) Does your fixed route require a transfer?

- ☐ Yes between fixed routes  
☐ Yes, between fixed route and On Demand  
☐ No

29) How often do you ride the bus?

- ☐ 5+ days per week ☐ Once a month or less  
☐ 3-4 days per week ☐ Less than once a week, but more  
☐ 1-2 days per week than once a month

30) How long have you been using RTS service?

- ☐ Less than 3 months ☐ 1-5 years  
☐ 3-6 months ☐ More than 5 years  
☐ 6 months – 1 year

31) Have you used RTS Go?

- ☐ No, I have never heard of RTS Go ☐ Yes, RTS Go mobile  
☐ No, but I have heard of RTS Go ☐ Yes, RTS Go card

32) Have you used any of the following of RTS's service offerings over the past 3 months? **(Check all that apply)**

- ☐ RTS On Demand ☐ Transit app  
☐ HOPR (Bike/Scooter Share) ☐ RTS Access  
☐ Text Alerts ☐ None of the above

33) For this trip, what payment method did you use?

- ☐ \$1.00 Cash Fare ☐ Senior/Disabled Cash  
☐ All-Day Pass ☐ Senior/Disabled All-Day Pass  
☐ Stored Value Pass ☐ Senior/Disabled 31 Day Pass  
☐ 31 Day Pass ☐ RTS Go mobile (Transit App)  
☐ RTS Go Card

34) Why are you on the bus for this trip?

- ☐ Work ☐ Shopping  
☐ Appointments ☐ Entertainment  
☐ School ☐ Other \_\_\_\_\_

Please provide us your name and phone number in case we need to re-contact you.

Name: \_\_\_\_\_ Email: \_\_\_\_\_ Phone/Mobile Number: \_\_\_\_\_

**Optional:** Please let us know if you would like to sign up for RTS News via Email or SMS/Text Messages (You can unsubscribe at any time)

☐ Email

☐ SMS/Text



# RGRTA Bus Ridership Survey Report

## Wave 49 (November 2022)

# Background

For 11 years, the RGRTA has been conducting quarterly ridership surveys of its riders (note that the May 2020 study was cancelled due to the COVID 19 pandemic).

## New for Wave 49:

- Q4 (Why do you ride RTS?) was changed to select all that apply.
  - Also, “I enjoy riding RTS” & “I don’t have to ask for rides” were added to the list of response options.
- Reimagine RTS questions were added back to the survey.
- Gender identity question responses changed to pronouns.
- Response options for which part of the English language causes trouble were made more explicit to include Reading and Speaking.
- A new question about employment status was added.
- A new question about local colleges was added.
- A new question about the reason for the current trip was added.
- Questions about the use of RTS technologies and services were re-added.

# Methodology

- Respondents were surveyed on 27 separate routes.
- Data was collected from October 26th – 29th, 2022. Surveys were collected in 4 different dayparts (weekday AM commute, midday, weekday PM commute, and weekend).
- A total of 528 surveys were completed, including 1 in Spanish. The overall results have a margin of sampling error of + or – 4.2% at the .95 level of confidence.
- Sample sizes were based on the percentage of the overall riders in the survey period and applied to the desired number of completes:
  - A minimum of 5 and maximum of 48 completed surveys per route.
  - This allows for minimal weighting as well as adequate coverage.

# Demographics

- New for w49 the gender question was updated so that respondents selected a pronoun rather than male or female.
- Between w48 and w49 there was a 4% increase in individuals identifying as neither He/Him (male, w48) or She/Her (female, w48).
- Riders identifying as He/Him (male, w48) decreased 10% from the prior wave.

- A minor change in w49, respondents were asked to identify which aspect of the English language gave them trouble (Reading, Speaking, or both) while navigating the RTS system.
- 40% responded that their difficulty with at least one aspect of the English language was an issue when navigating the system.

- New for w49, respondents were asked to identify their employment status.
- 52% were employed full or part-time, self-employed or contract workers.
- 14% of respondents were students (64% full-time, 36% part-time).
- 27% either worked at or attended area colleges.

# Usage Metrics

- For w49, respondents were asked the reason for their current bus trip. 75% were riding for work, school or appointments.
- A minor change from w48, respondents were able to select “Don’t have to ask for rides”(42%) and “I enjoy riding RTS” (32%) as reasons for riding the bus.

- Bus frequency (8.7), route coverage (8.6) and on-time arrival (8.6) were rated as the most important aspects of riding the bus.
- Respondents were also asked about transfers (added in w49 as part of the annual requirement). 54% said that their trip required a transfer.

- Respondents were asked which of RTS’s service offerings they had used in the past. The Transit App (34%) and RTS On Demand (27%) were most popular. 31% said that they had not used any additional services.



# Usage Metrics

- Added back for w49, respondents were asked about Relmagine RTS.
- Respondents selected RTS On Demand and More Frequent Rides as the most helpful updates for them.
- 60% said Relmagine has made their RTS experience Somewhat to Much Better.

- 59% of respondents said that because of changes resulting from Relmagine, they have increased the number of rides they take.
- Additionally, 74% of respondents said that Arrival times have improved the most and 34% felt that Departure Times improved the most.

- Loyalty (8.8) remains steady over the past 10 waves.
- 50% of respondents rode the bus for 15+ minutes.
- There was a 5% increase in the number of riders that have been riding RTS for 5 or more years.

**Implication:** 60% of respondents believe that Relmagine has improved their experience, mostly by improving arrival times, bus frequency and the addition of RTS On Demand. Last wave, 18% of respondents had never heard of RTS Go – in w49 that number has increased to 29%. There was a 5% increase in respondents from outside of the Greater Rochester Area which may be causing the drop in awareness.

Title VI Program Plan June 2023-2026, Version 6

# RTS Performance Metrics

- Overall Satisfaction with RTS did not change in w49 (8.2).
- Cleanliness (7.7) and Crowding (7.9) were the lowest rated performance attributes. While Ease of Entering/Exiting Buses (8.5) was the highest rated.

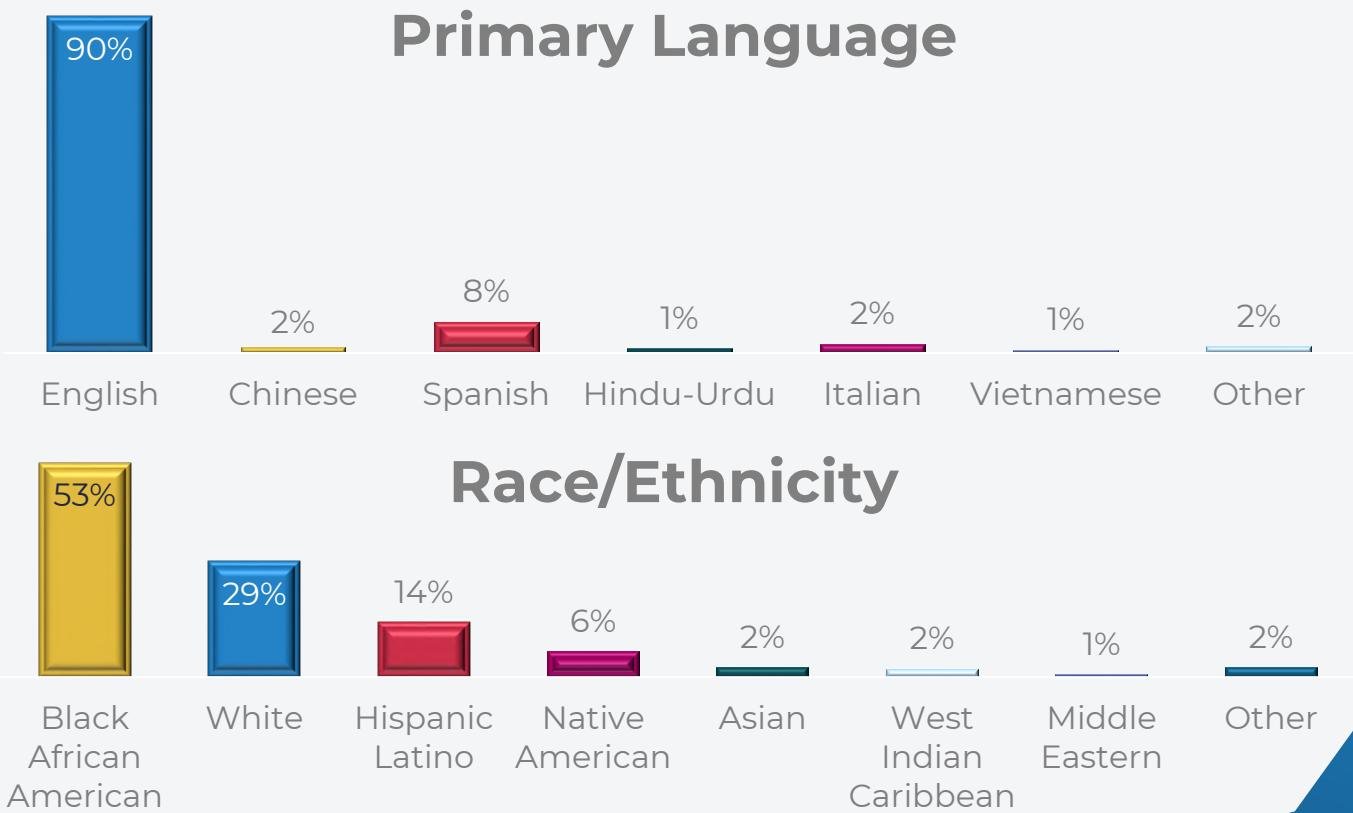
- Ratings for On-time Arrival expectations increased to 8.2 from 7.7 in w48.
- Riders who use text alerts (8.5) and riders who do not use any additional services (8.6) gave the highest ratings for On-time Arrival meeting expectations.

• Scores for Bus Frequency, Crowding, Safety and Cleanliness all increased from w48.		
<u>Attribute</u>	<u>w48</u>	<u>w49</u>
Frequency:	7.6	8.1
Crowding:	7.3	7.9
Safety:	7.8	8.1
Cleanliness:	7.4	7.7

**Implication:** For w49 there has been an improvement in arrival time scores meeting expectations. Although Cleanliness and Crowding were the lowest rated performance attributes, each received its highest rating since w41 (Cleanliness - 7.9) and w42 (Crowding – 7.6).

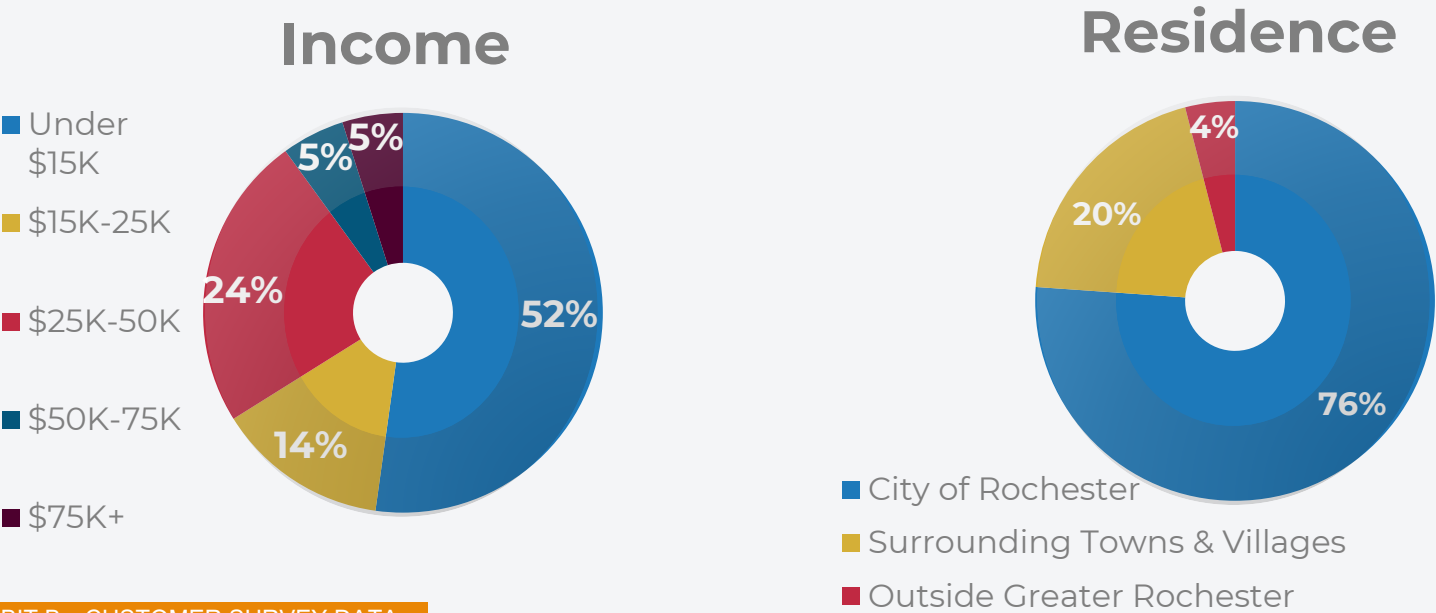
# Race/Ethnicity + Language

- There was a 3% increase in riders identifying as Hispanic compared to the previous wave.
- Riders identifying as Native American or Alaskan Native increased by 4% from the previous wave.



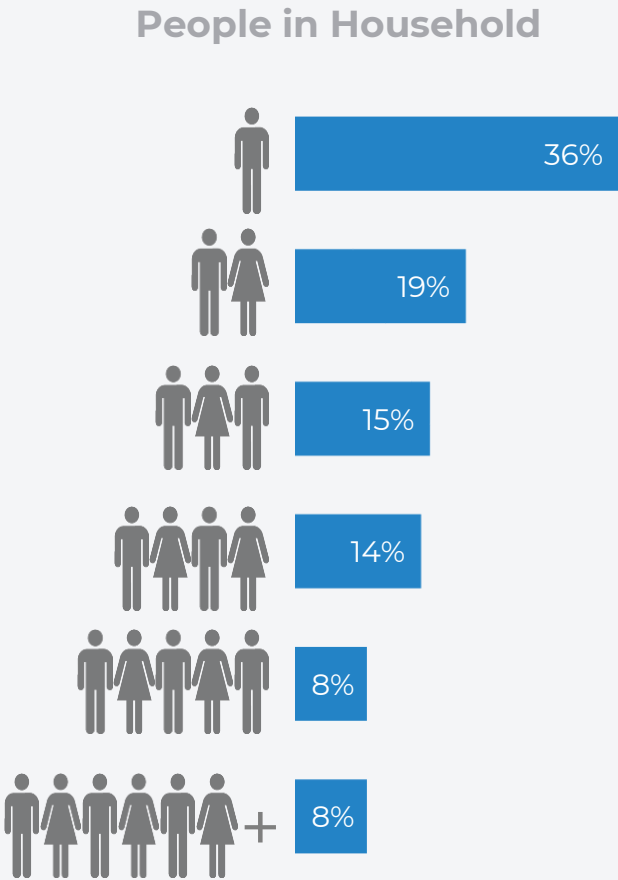
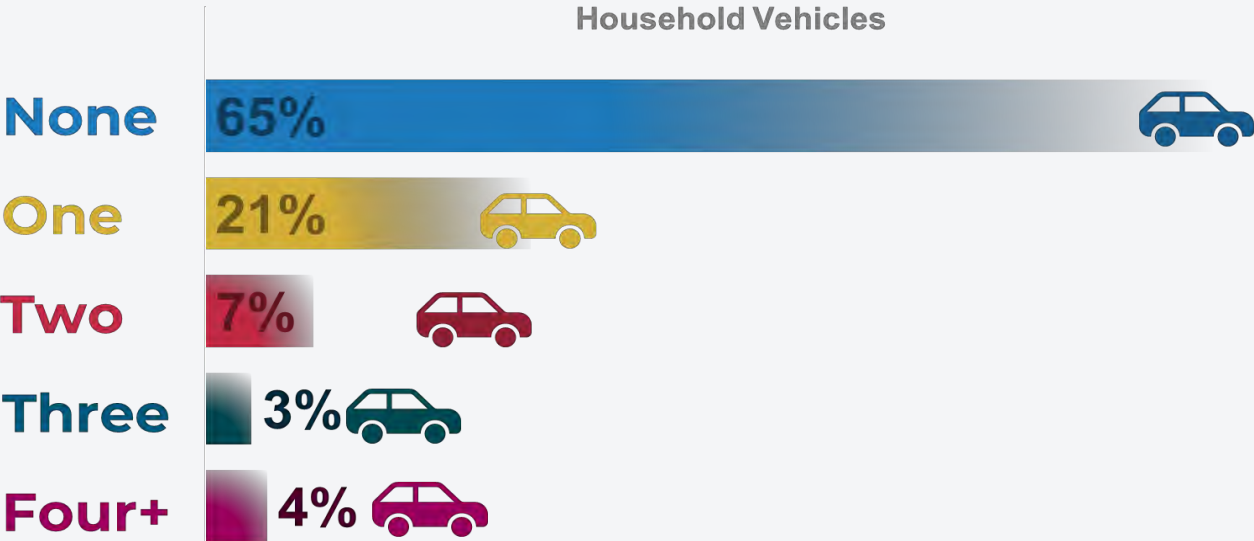
# Income & Residency

- People taking the survey that reside outside of the City of Rochester (based on zip code) increased by 5% from the previous wave.



# Household Members & Vehicles

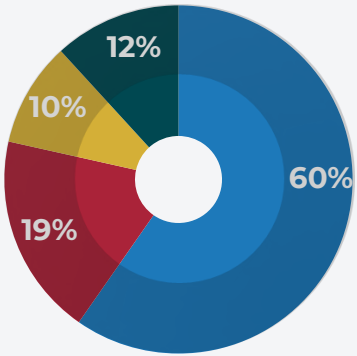
- Respondents without access to a vehicle increased from 57% in w48 to 65% in the current wave.
- 3-person households dropped 7% from the prior wave.



# Accessibility

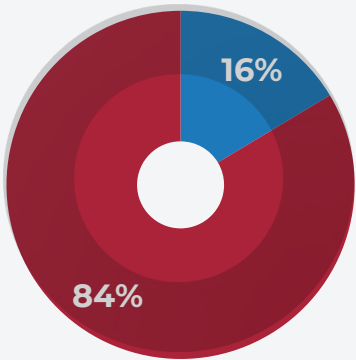
- New for Wave 49, respondents were asked about the specific aspects of English they might have difficulty with.
  - 41% of respondents believe the use of English makes it difficult to navigate RTS. This is up 10% from the prior wave.
- Respondents with conditions that make transportation difficult decreased by 5% from the previous wave.

Difficulty w/  
English



■ None ■ Reading ■ Speaking ■ Both

Transportation  
Difficulties

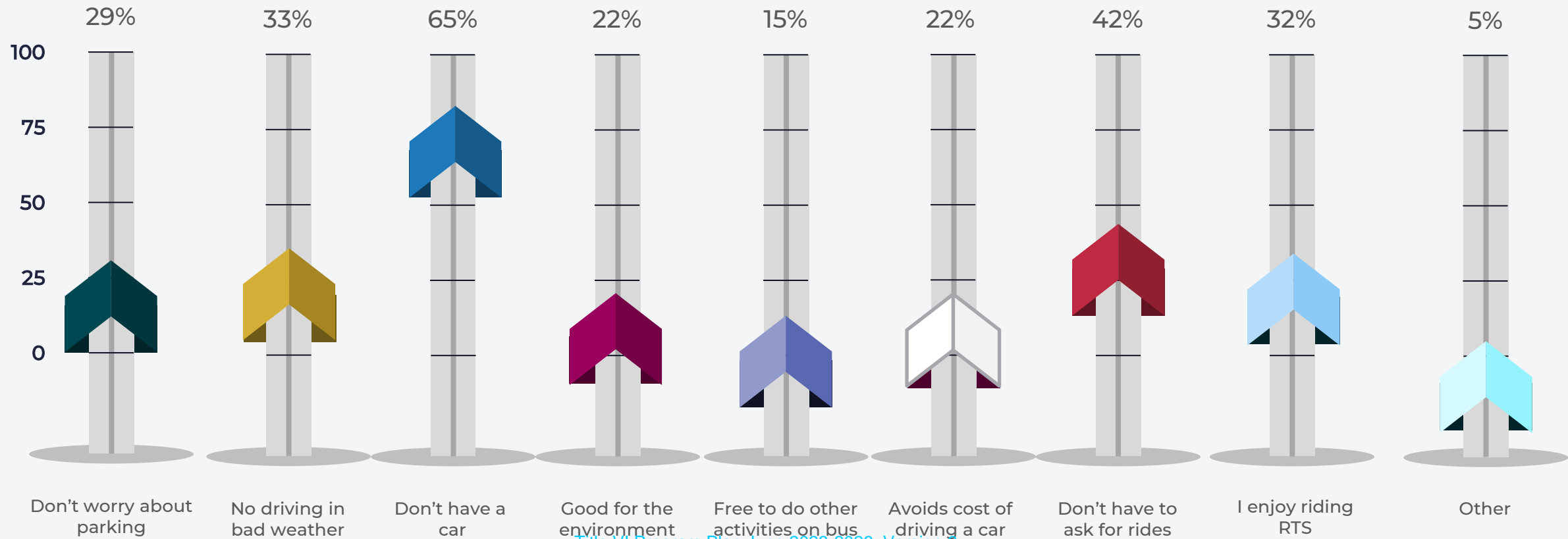


■ Yes ■ No



# Reasons for Riding

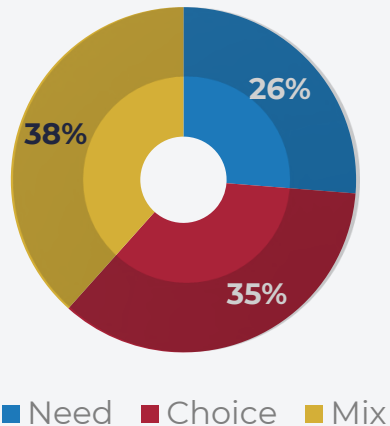
- “I enjoy riding RTS” and “Don’t have to ask for rides” were newly added reasons for riding RTS in w49.
- “Don’t have a car” dropped 10%, “Avoids cost of driving a car” dropped 8% from w47, which was the last time reasons for riding was measured in this way.



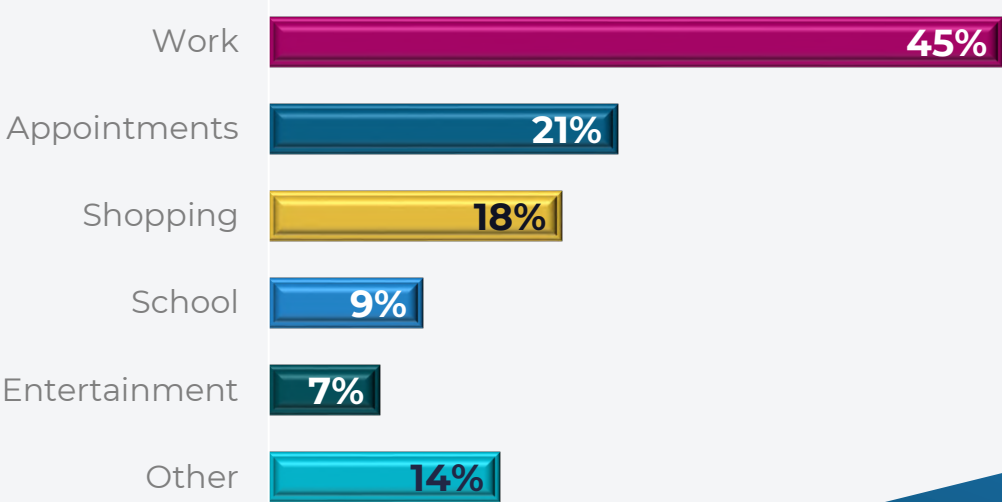
# Reasons for Riding

- Compared to w47, ridership based on Need is down 15% while Choice ridership has increased 12%.
- The decrease in need-based riding could potentially be due to the decrease of riders without access to a car.

Need, Choice, Mix

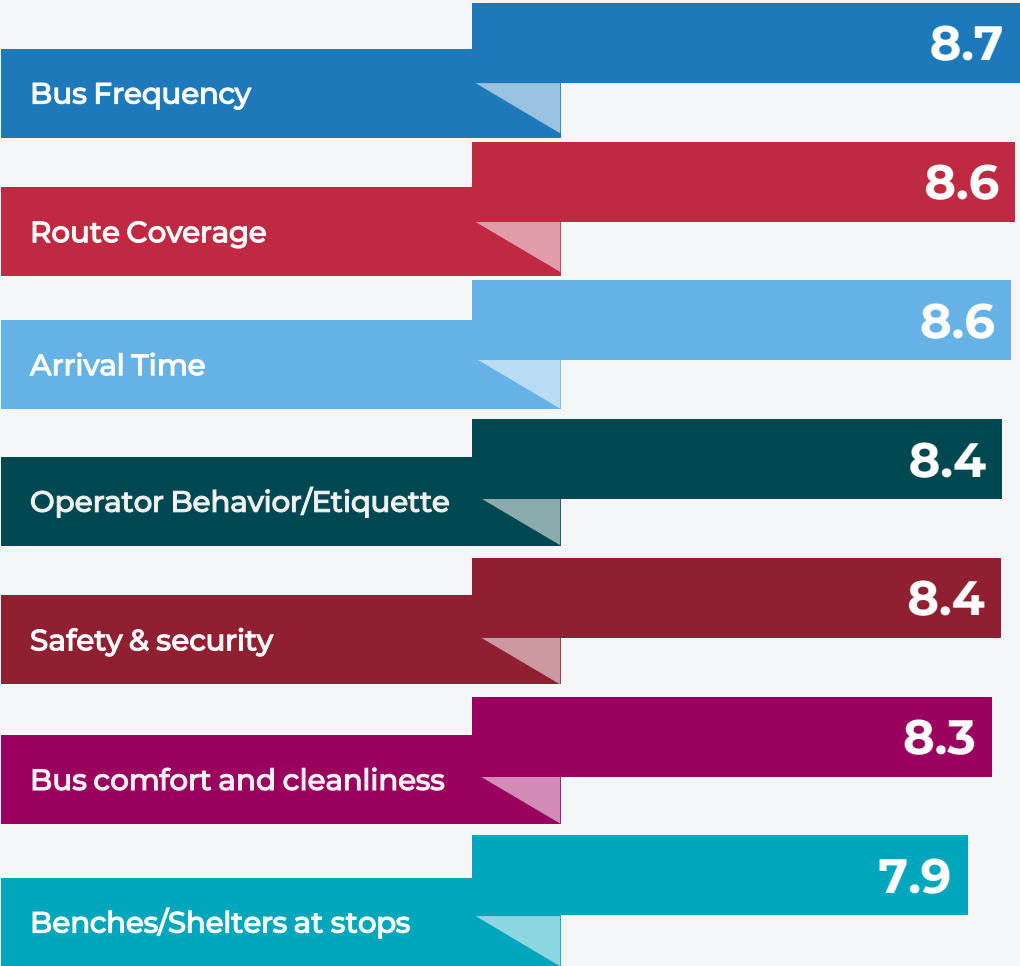


Purpose of Today's Trip



# Most Important

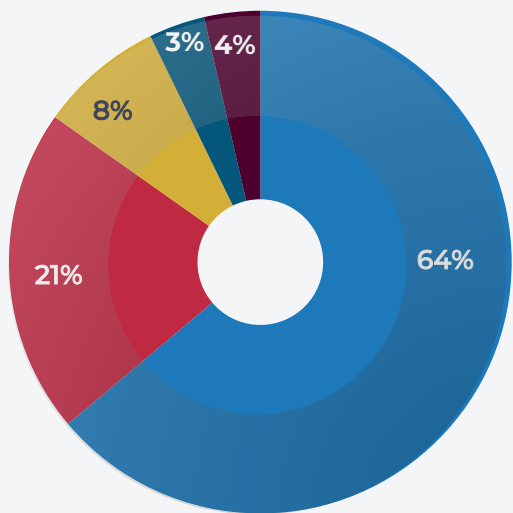
- Bus Frequency, Route Coverage and Arrival Time were rated the three most important aspects of riding the bus.



# Frequency + Tenure

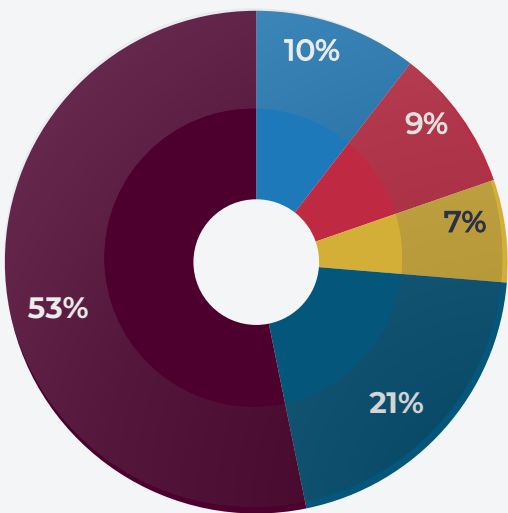
- Representation of the most tenured riders is up 5% from the previous wave.

Ride Frequency



■ 5+                      ■ 3-4x /wk                      ■ 1-2x /wk  
■ <1/wk, >1/m                      ■ <once a month

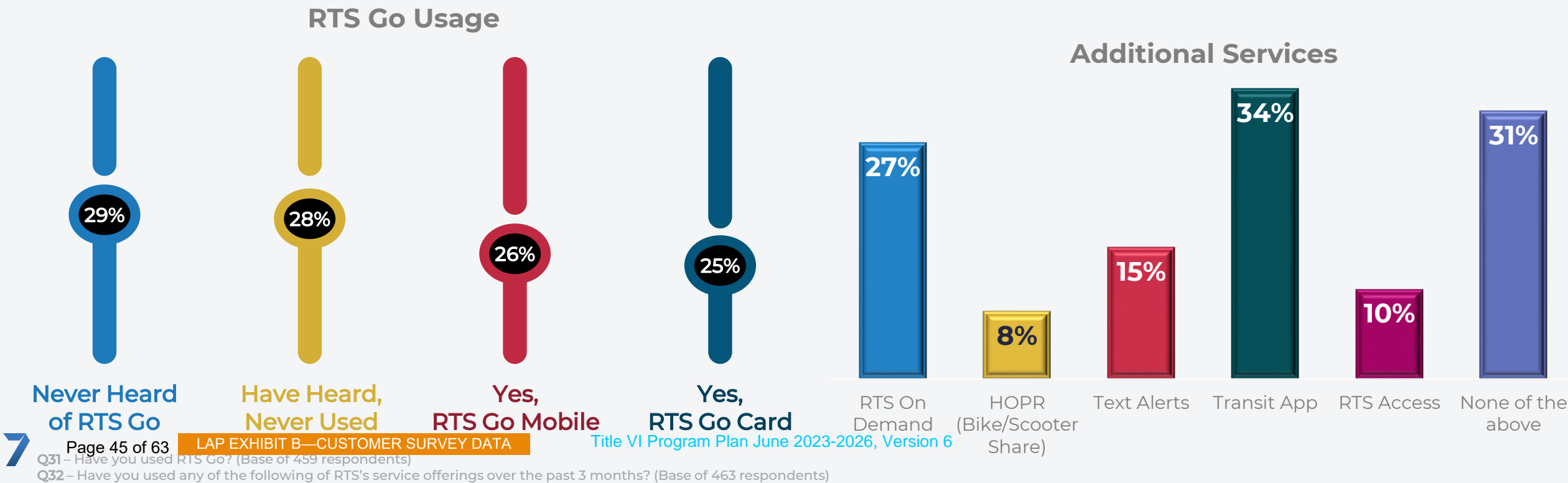
Tenure



■ < 3 months                      ■ 3-6 months                      ■ 6-12 months  
■ 1-5 yrs                      ■ 5+ yrs

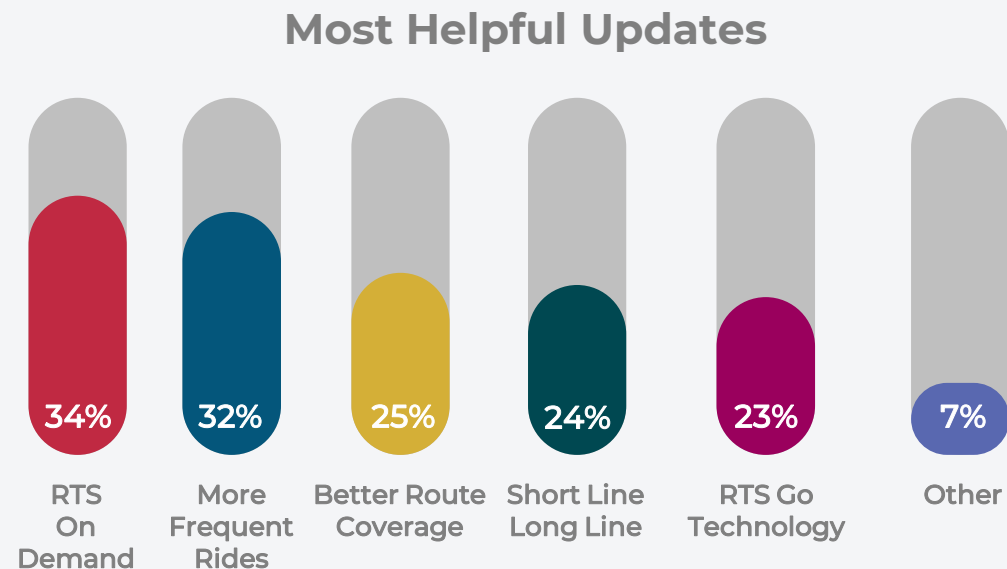
# RTS Go and Other Service Offerings

- New for Wave 49 respondents were asked if they have used any of the additional RTS service offerings.
  - Transit App (34%) and RTS On Demand (27%) were the most popular services used.
- Compared to w48, there was an 11% drop in awareness of RTS Go.

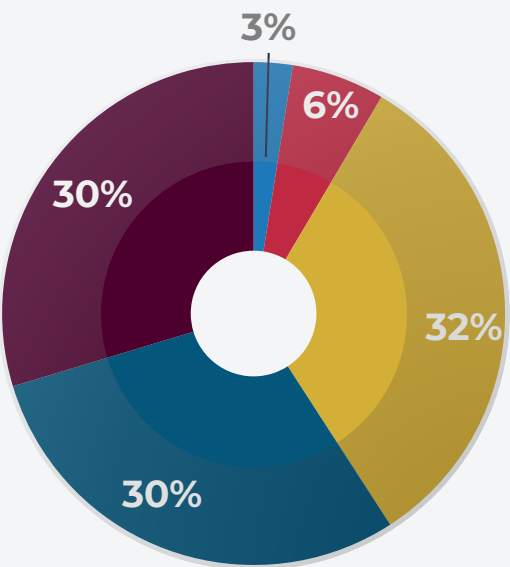


# ReImagine RTS

- RTS On Demand (34%) and More Frequent Rides (32%) are rated as the most beneficial aspects of ReImagine RTS.
- 60% of respondents find the ReImagine RTS experience to be Somewhat (30%) or Much (30%) Better than before ReImagine was launched.



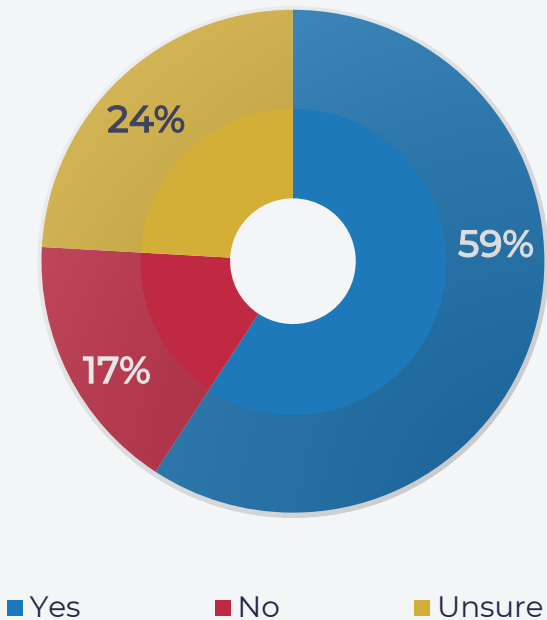
**ReImagine Experience**



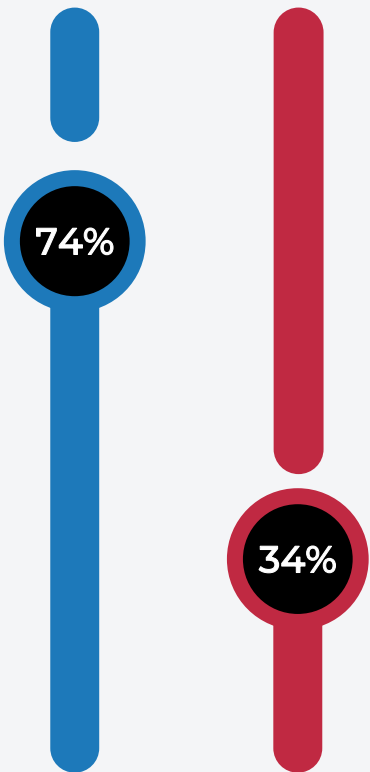
■ Much Worse  
■ Somewhat Worse  
■ Neutral  
■ Somewhat Better  
■ Much Better

# Relmagine RTS (cont.)

Do you Ride More?



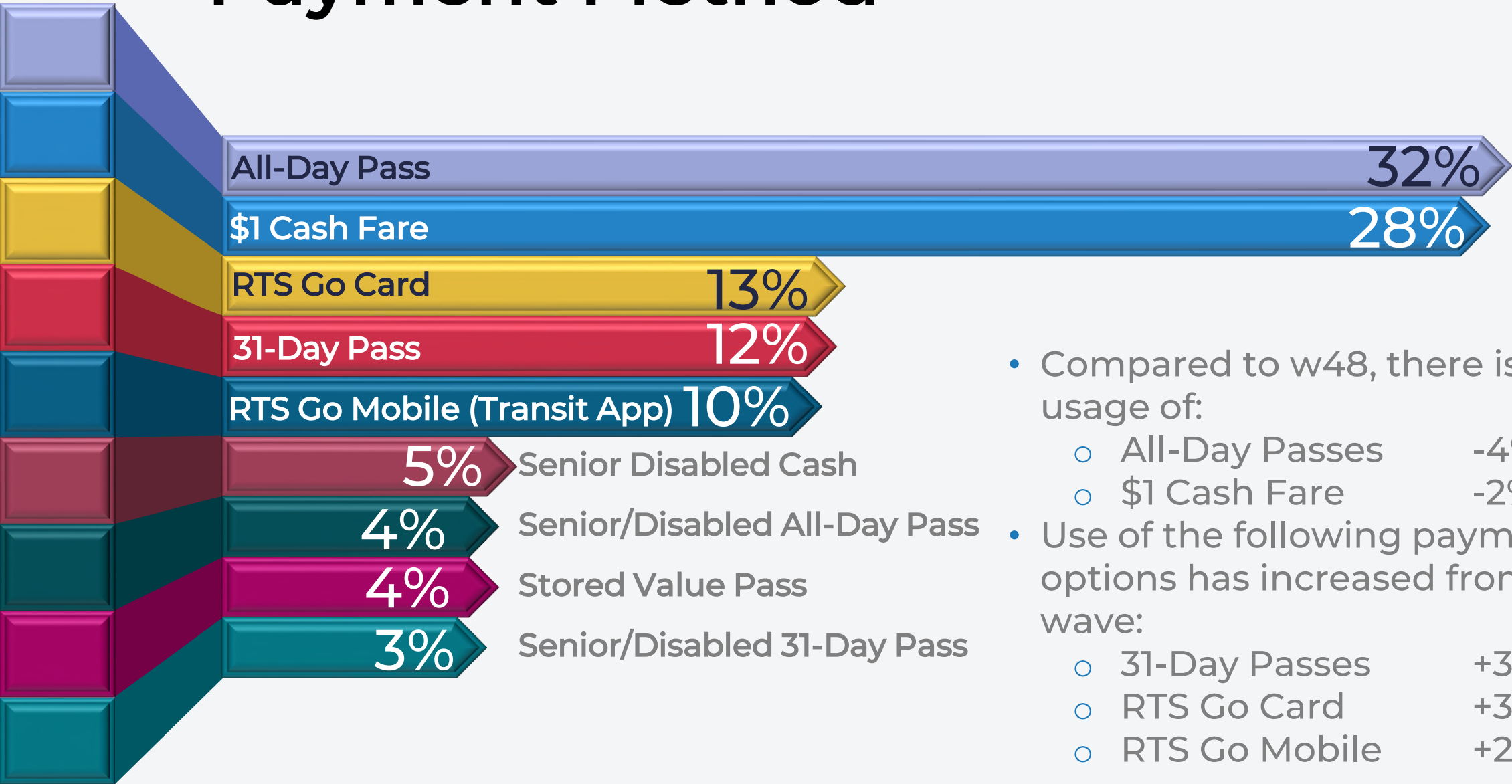
Most Improved



- 59% of respondents believe that changes resulting from Relmagine RTS has led to them to ride more frequently.
- The increased frequency of buses has improved arrival times the most, according to respondents.



# Payment Method



- Compared to w48, there is declining usage of:
  - All-Day Passes -4%
  - \$1 Cash Fare -2%
- Use of the following payment options has increased from the prior wave:
  - 31-Day Passes +3%
  - RTS Go Card +3%
  - RTS Go Mobile +2%

## EXHIBITS

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# Exhibit C—Samples of Spanish Translations

## Samples of Spanish Translations During Program Period 2023-2026

(1) Translated interior card posted inside all RTS Connect buses to supplement onboard decals (shown below). All vehicle decals will be updated with the additional sentence and replaced in 2023-2024.

1


**REGIONAL TRANSIT SERVICE**

For information about RGRTA's civil rights program or Title VI, call (585) 288-1700 or use [myRTS.com/contact-us](http://myRTS.com/contact-us).

Para solicitar información sobre el programa de derechos civiles de RGRTA o el Título VI, llame al (585) 288-1700 o utilice [myRTS.com/contact-us](http://myRTS.com/contact-us).

### Title VI Notice Regional Transit Service

RTS operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

Any person who believes he or she has experienced any unlawful discriminatory practice under Title VI, may file a written complaint with the RGRTA Legal Department within 180 of the alleged discriminatory act.

To learn about Title VI or the procedures for filing a complaint visit [www.myRTS.com/TitleVI](http://www.myRTS.com/TitleVI)

Call 585-288-1700 or use [www.myRTS.com/contact-us](http://www.myRTS.com/contact-us) to request language assistance or an accessible format.

Complaints may also be filed with the Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

### Título VI Aviso Regional Transit Service

RTS opera sus programas y servicios sin distinción de raza, color y origen nacional, de conformidad con el Título VI del Acta de Derechos Civiles.

Cualquier persona que cree que él / ella ha experimentado cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja ante RTS.

Para obtener más información sobre el programa de RGRTA los derechos civiles, los procedimientos para presentar una queja, y el proceso de respuesta:

- Llame al 585-288-1700
- Visite [www.myRTS.com/contact-us](http://www.myRTS.com/contact-us)
- O visite [www.myRTS.com/TitleVI](http://www.myRTS.com/TitleVI)

Las quejas también podrán ser presentadas directamente ante la Administración Federal de Tránsito poniéndose en contacto con la Oficina de Derechos Civiles, 1200 New Jersey Ave., NW, Washington, DC 20590.

Si se necesita información en otro idioma, por favor llamen al 585-288-1700.



## (2) RTS Ontario route deviated schedule.

2

### Servicio de ruta

Ofrecemos servicio de ruta en todo el condado de Ontario. Tenga en cuenta que los paradas que se muestran en todas las rutas de RTS Ontario son solo las principales. Hay paradas adicionales a lo largo de la ruta.

### Tarifas de ruta (viaje de ida)

Adultos	\$1.00
Adultos mayores de 60 años	\$0.50
Niños con discapacidad	\$0.50
Faltas (menores de 5 años)	GRATIS
Acompañados por un adulto con pasaje	GRATIS
Veteranos	GRATIS

Los menores pueden usar un servicio adicional: servicio para Niños/Ontario. Con un pasaje adicional, los menores pueden usar el Condado como destino. Servicio Agency: 585-394-2250. 6:00 a.m. - 6:00 p.m. (Vespertino: 585-394-2250).

### Servicio de desvío de ruta

Ofrecemos servicio de desvío de ruta para viajes **dentro** del radio de 10 millas (servicio de ruta de la zona 1). Si una ley de las personas de naturaleza habitual, el desvío de ruta puede ser una buena opción para usted. Para reservar un viaje, llame a RTS Ontario durante el horario normal de atención al público entre 48 horas y una semana antes de la fecha de su viaje. Los reservas de los fines de semana y festivos deben hacerse antes de las 3:00 p.m. del viernes anterior.

### Servicio de desvío de ruta (viaje de ida)

\$2.00 (las tarifas por desvío no se aplican para el servicio de desvío de ruta).

### RTS Ontario conecta

Conectamos con RTS Wayne, RTS Seneca y RTS en el condado de Monroe. RTS Ontario se conecta con las condadas de Wayne, Seneca y Monroe a través del servicio con RTS. Para obtener información sobre el horario de conectividad regional, visite [myRTS.com](http://myRTS.com) o llame al 585-394-2250.

### Servicio Dial-A-Ride

Ofrecemos servicio Dial-A-Ride (pedido telefónico de transporte) para viajes fuera del radio de 10 millas del servicio de ruta de la zona 1. Para programar un servicio Dial-A-Ride, llame a la oficina de RTS Ontario de lunes a viernes de 9:00 a.m. a 3:00 p.m. con una anticipación de 48 horas antes de la fecha de su viaje. Cuando llame, le informaremos si su viaje está dentro o fuera de la zona 1 o 2.

### Tarifas de Dial-A-Ride (viaje de ida)

Dentro de la zona 1 y zona 2	\$9.00
Entre la zona 1 y zona 2	\$10.00

### Bonos económicos

Phoria: dinero correspondiente a un bono económico, disponible en cualquier autobús RTS Ontario. Los bonos económicos son válidos en las rutas RTS Seneca, RTS Livingston, RTS Orleans, RTS Seneca, RTS Wayne y RTS Wyoming. Para comenzar un viaje, el conductor debe alquilar el autobús y le garantizamos un bono económico.

### Bonos económicos

Bono económico de \$10	11 viajes
Bono económico de \$20	22 viajes

RTS 252  
IDIAS DE SEMANA

**RTS**  
REGIONAL  
TRANSIT  
SERVICE  
ONTARIO

### RTA 252 Canandaigua South

Disponible a partir del 6 de septiembre del 2022

## ¡Qué tenga un buen viaje!

En RTS Ontario, no solo deseamos llevarlo a su destino de forma segura y puntual. También queremos que tenga un viaje agradable. Por eso, ya sea que haya tomado nuestro servicio de ruta o nuestro servicio Dial-A-Ride, esperamos que disfrute del viaje.

2930 County Road 48  
Canandaigua, NY 14424

**585-394-2250**  
[myRTS.com](http://myRTS.com)

Para obtener más información, visite [myRTS.com](http://myRTS.com).

Palabra clave: enjoyRTS

Ruta 252 - Canandaigua Sur (lunes - viernes)												
Canandaigua Transit Hub/ 74 West Ave. Lot	6:30	7:30	8:30	9:30	10:30	11:30	12:30	2:30	3:30	4:30	5:30	6:30
Thompson Hospital	6:35	7:35	8:35	9:35	10:35	11:35	12:35	2:35	3:35	4:35	5:35	6:35
80 Parrish Street	6:38	7:38	8:38	9:38	10:38	11:38	12:38	2:38	3:38	4:38	5:38	6:38
Parkway Plaza	6:45	7:45	8:45	9:45	10:45	11:45	12:45	2:45	3:45	4:45	5:45	6:45
Wegmans	6:48	7:48	8:48	9:48	10:48	11:48	12:48	2:48	3:48	4:48	5:48	6:48
Roseland Plaza	6:51	7:51	8:51	9:51	10:51	11:51	12:51	2:51	3:51	4:51	5:51	6:51
FLCC Lakeshore Campus	6:55	7:55	8:55	9:55	10:55	11:55	12:55	2:55	3:55	4:55	5:55	6:55
Ontario County Complex	7:02	8:02	9:02	10:02	11:02	12:02	1:02	3:02	4:02	5:02	6:02	7:02
Walmart	7:11	8:11	9:11	10:11	11:11	12:11	1:11	3:11	4:11	5:11	6:11	7:11
Canandaigua Town Center Plaza	7:16	8:16	9:16	10:16	11:16	12:16	1:16	3:16	4:16	5:16	6:16	7:16
Saltonstall Road	7:20	8:20	9:20	10:20	11:20	12:20	1:20	3:20	4:20	5:20	6:20	7:20
Jefferson Square	7:21	8:21	9:21	10:21	11:21	12:21	1:21	3:21	4:21	5:21	6:21	7:21
Canandaigua Transit Hub/ 74 West Ave. Lot	7:30	8:30	9:30	10:30	11:30	12:30	1:30	3:30	4:30	5:30	6:30	7:30

Los horarios del servicio vespertino aparecen en negrita.

Hora de almuerzo: Ruta no funcionará entre las 1:30 p.m. - 2:30 p.m.



(3) Educational material on how to use the RTS Go fare system, posted on <https://myrts.com/RTS-Go>.

3



## Presentamos una forma más fácil de pagar por tus viajes: RTS Go!

Con RTS Go, solo pagarás por los viajes que realices:

¡Cuanto más viajes, más ahorrarás!

Nunca pagarás más de \$3 al día o \$56 al mes.

RTS Go está disponible en tu celular o con una tarjeta inteligente recargable.

1



transit

### RTS Go: celular

Puedes usar RTS Go desde tu celular en la Apple Store o Google Play. Busca el logotipo de RTS Go, crea una cuenta y agrega crédito. Luego, selecciona el logo de RTS Go en el código QR y valida en el validador de tarifas del autobús. ¡Y listo!

Valida tu celular aquí

2



### RTS Go: tarjeta o smart card

Las tarjetas inteligentes RTS Go se pueden comprar en las máquinas expendedoras de tarjetas inteligentes, agregar fondos y usarla. Cuando estés listo, toca con tu tarjeta RTS Go ubicada cerca del validador de tarifas del autobús con tu tarjeta. ¡Y listo!

Toca con tu tarjeta inteligente aquí



## ¿Por qué viajar con RTS Go?

### Ahorrar dinero

RTS Go permite la funcionalidad de pagar a la vez que viajas. Los límites tarifarios del sistema RTS Go son un máximo de \$3 al día, y tienen en cuenta la frecuencia de los viajes que realizas para asegurarse de que nunca gastes más de \$56 al mes.

### Compra tu boleto en cualquier lugar en cualquier momento

Puedes añadir crédito en cualquier lugar y en cualquier momento a través de tu celular inteligente o en línea.

### Prevención de pérdida de crédito (o fondos)

Siempre que registres tu cuenta, el crédito estará seguro (incluso si pierdes tu tarjeta o celular).

### Rápido embarque

Simplemente toca con la tarjeta RTS Go o escanea un boleto RTS Go Mobile (código QR) en los validadores RTS y espera a que se encienda la luz verde.

### Integrado con la aplicación Transit

RTS Go está integrado con la aplicación **Transit** para que puedas planificar tu viaje, consultar horarios en tiempo real y pagar tu viaje en un solo lugar.

### ¿Alguna pregunta?

Contáctanos en [myRTS.com/contact-us](https://myRTS.com/contact-us) o 585-288-1700

Powered by **justride**



## (4) Brochure explaining RTS On Demand.

4

**¿Necesita transporte?**

RTS On Demand puede llevarlo a cualquier lugar dentro de una de nuestras siete Zonas a demanda. Use RTS On Demand para el servicio de acera a acera, o para una conexión con el servicio RTS Connect y otras opciones de transporte en un nodo de conexión o en una parada de autobús.

**¿Tiene preguntas? ¡Contáctenos!**

**Sitio web:** myRTS.com/Contact-Us  
**Por teléfono:** (585) 288-1700  
 (Para atención en español, por favor llamar.)

**En persona:** Mostrador del Servicio de Información al Cliente en RTS Transit Center

**¡Acceda a todo RTS desde su teléfono!**

Descargue las aplicaciones RTS On Demand y Transit:

**ONDEMAND**

**Su transporte.  
A su manera.**

**Listos para cuando usted nos necesite**

El servicio RTS On Demand ayuda a los clientes a disfrutar de una experiencia más personalizada, flexible y confiable en áreas que no tienen servicio de transporte público de rutas fijas.

**Solicite su viaje de una de estas tres formas:**

- Utilice la aplicación RTS On Demand
- Visite myRTS.com
- Llame al Servicio al Cliente, al 585-288-1700

Puede hacer su reserva de RTS On Demand hasta 12 horas antes de su viaje y reservar para hasta 5 personas por vez. Todos los vehículos de RTS On Demand son accesibles según ADA y tienen portabicicletas.

Le rogamos que esté en su punto de recogida al menos 5 minutos antes de la hora de recogida programada. Los operadores lo recogerán de cualquiera de los lados de la calle, incluso si la calle limita con la zona a demanda, en un vehículo claramente señalado con el logotipo de RTS On Demand. Verifique siempre el número de matrícula que se le informó al realizar su reserva.

Lo sentimos, pero los operadores de RTS On Demand no pueden aceptar clientes que no hayan reservado un transporte a demanda.

**Qué debe llevar:**

- Límite a dos artículos de mano que quepan en su regazo o debajo del asiento.
- Se admiten los animales de servicio y las mascotas, siempre que se respeten las pautas. Lea más sobre adaptaciones razonables relacionadas con el servicio RTS On Demand en myRTS.com.



Los mapas detallados para cada zona a demanda están disponibles en myRTS.com o en RTS Transit Center.

**Zonas y horarios del servicio RTS On Demand:**

<b>Brockport</b>	De lunes a viernes: Sábado: Domingo:	5:00 a. m. a 10:00 p. m. 6:00 a. m. a 10:00 p. m. 6:00 a. m. a 6:00 p. m.
<b>Greece</b>	De lunes a viernes: Sábado: Domingo:	5:00 a. m. a medianoche 6:00 a. m. a medianoche 6:00 a. m. a 10:00 p. m.
<b>Henrietta</b>	De lunes a viernes: Sábado: Domingo:	5:00 a. m. a medianoche 6:00 a. m. a medianoche 6:00 a. m. a 10:00 p. m.
<b>Irondequoit</b>	De lunes a viernes: Sábado: Domingo:	5:00 a. m. a 10:00 p. m. 6:00 a. m. a 10:00 p. m. 6:00 a. m. a 10:00 p. m.
<b>Lexington</b>	De lunes a viernes: Sábado: Domingo:	5:00 a. m. a 10:00 p. m. No hay servicio de fin de semana No hay servicio de fin de semana
<b>Pittsford/ Eastview</b>	De lunes a viernes: Sábado: Domingo:	5:00 a. m. a 10:00 p. m. 6:00 a. m. a 10:00 p. m. 6:00 a. m. a 6:00 p. m.
<b>Webster</b>	De lunes a viernes: Sábado: Domingo:	5:00 a. m. a 10:00 p. m. 6:00 a. m. a 10:00 p. m. 6:00 a. m. a 6:00 p. m.

**Para pagar su tarifa\***

- Use la RTS Go desde la aplicación móvil Transit
- Compre una tarjeta RTS Go
- Pague en efectivo: solo se admite el monto exacto. Los operadores del servicio On Demand no pueden entregar tarjetas de cambio.


\*Por favor, no deje propina a los operadores del servicio On Demand.

RTS On Demand (vigencia desde 5/17/21)	Hacia o desde la parada de autobús de RTS o el nodo de conexión	Acera a acera
<b>Adultos</b>	\$1.00/viaje	\$3.00/viaje
<b>Niños entre 6 y 11</b>	\$0.50/viaje	\$1.50/viaje
<b>Adultos mayores</b>		
<b>Personas con discapacidades</b>		
<b>Niños menores de 5</b>	Gratis	Gratis
<b>Clientes de RTS Access con credencial de identificación de Access</b>		
<b>Veteranos con credencial del Veterans Outreach Center</b>		



(5) Updated Title VI Notice that is posted at all office locations. Example shown is for RTS Genesee.

5


January 2023

**Notice to the Public of Rights Under Title VI**

RGRTA, as a recipient of federal funding, gives public notice of its policy to fully comply with Title VI of the Civil Rights Act of 1964 and all related laws and statutes.

No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any RTS program or activity, as provided by Title VI of the Civil Rights Act of 1964 and as amended.

RGRTA operates its programs without regard to race, color, or national origin.

To request information about RGRTA's civil rights program or obligations under Title VI, please:

- Call Customer Service at (585) 288-1700
- Use [myRTS.com/contact-us](https://myRTS.com/contact-us)
- Visit the Administration Office at 1372 East Main Street, Rochester, NY (business hours are Monday through Friday, 8:00 AM to 5:00 PM)

Any person who believes that he or she has individually, or as a member of any specific class of persons, been excluded from participation in, been denied the benefits of, or otherwise subjected to discrimination under any RGRTA service, program, or activity, and believes the discrimination is based upon race, color, or national origin has the right to file a Title VI complaint with RGRTA.

All complaints must be filed in writing with the RGRTA Legal Department within 180 days of the alleged discriminatory act or occurrence. Complaint forms may be obtained through the following contacts:

- (585) 288-1700
- [myRTS.com/titleVI](https://myRTS.com/titleVI)
- [myRTS.com/contact-us](https://myRTS.com/contact-us)

In addition to the Title VI process at RGRTA, Title VI complaints may be filed with the Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

**Título VI Aviso al Público de la Ley de Derechos**

RGRTA como recipiente de fondos federales da aviso al público sobre su política para asegurar la conformidad de Título VI de la Ley de Derechos Civiles de 1964 y cada ley o estatuto relacionado.

Ninguna persona en los Estados Unidos por causa de su raza, color, o origen nacional sea excluida de participar en, ser negada los beneficios de, o ser de otra manera sujeta a la discriminación bajo cualquier programa o actividad que recibe asistencia financiera federal conforme a lo dispuesto por el Título VI de la Ley de Derechos Civiles de 1964 con todas sus modificaciones.

RGRTA conduce sus programas sin considerar raza, color, ni origen nacional.

Para solicitar información sobre el programa de derechos civiles de RGRTA o las obligaciones conforme al Título VI, por favor, realice cualquiera de los siguientes pasos:

- Llamar al Servicio al cliente al teléfono (585) 288-1700
- Utilizar [myRTS.com/contact-us](https://myRTS.com/contact-us)
- Visitar la oficina de Administración en 1372 East Main Street, Rochester, NY (el horario de atención es de lunes a viernes, de 8:00 a. m. a 5:00 p. m.)

Cada persona que crea haber sido individualmente, o por ser miembro de una clase específica de personas, sea excluida de participar en, ser negada los beneficios de, o ser de otra manera sujeta a la discriminación bajo cualquier servicio de RGRTA, programa o actividad, y crea que la discriminación está basada en raza, color o origen nacional, tiene el derecho de hacer una queja de protección Título VI con RGRTA.

Cada queja debe ser escrita y presentada al Departamento Legal de RGRTA dentro de 180 días desde el día del acto discriminatorio supuesto o incidente como sigue. Se encuentra las aplicaciones por los contactos abajo:

- (585) 288-1700
- [myRTS.com/titleVI](https://myRTS.com/titleVI)
- [myRTS.com/contact-us](https://myRTS.com/contact-us)

Además del proceso Título VI por RGRTA, se puede enviar quejas con la administración de tránsito federal por correo directamente a: Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.



- (6) Bilingual decal posted inside all RGRTA vehicles with on-board cameras.
- (7) Bilingual Service Animal decal posted inside all RGRTA vehicles.
- (8) Bilingual Priority Seating decal posted inside all RTS fixed route buses.
- (9) Bilingual decal posted inside RTS fixed route buses.
- (10) Bilingual Seat Belt decal posted inside all RTS On Demand vans.

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**CE:** For your protection, there is ongoing video and audio recording of all customers and employees.

**AVISO:** Para su protección, hay grabación continua de video y audio de todos los clientes y empleados.

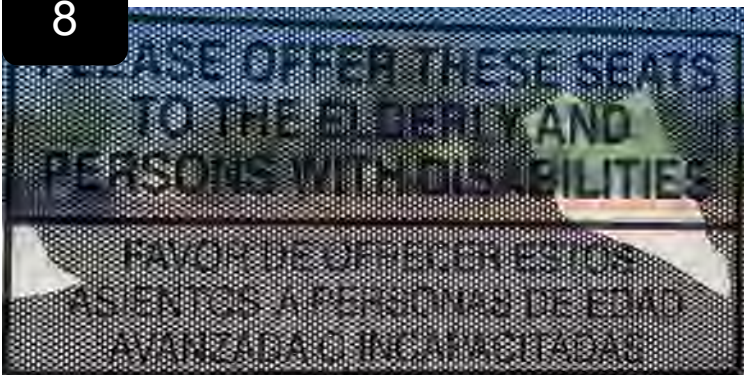
7

**SERVICE ANIMALS  
WELCOME**



**SE PERMITE EL INGRESO  
DE ANIMALES DE SERVICIO**

8



9



10



(11) RTS Go mitigations information posted on <https://myrts.com/Secondary-Nav/About-Us/Policies-and-Procedures/RTS-Go-Mitigation>.

11

About Us | Policies and Procedures | RTS Go Mitigation

## RTS Go Fare System: Mitigations for Low-Income Customers

En español (.pdf)

The Federal Transportation Administration (FTA) requires RTS to apply environmental justice criteria to the new RTS Go fare collection system. To achieve environmental justice, RTS seeks to reduce adverse effects for low-income customers.

### Sistema tarifario RTS Go: Mitigaciones para los clientes con bajos ingresos

La Administración Federal de Transporte (FTA) le exige a RTS que aplique criterios de justicia ecológica al nuevo sistema de cobranza de tarifas de RTS. Para lograr la justicia ecológica, RTS busca reducir los efectos adversos que tendrá la nueva modalidad sobre los clientes de bajos ingresos\* sin tarjetas de crédito ni cuentas bancarias a través de la implementación de las siguientes acciones: (1) educar a todos los clientes; (2) brindarles a todos los clientes cuatro opciones de pago en efectivo; (3) mantener las máquinas expendedoras de boletos en las mismas ubicaciones; (4) eximir del pago de cargos y (5) aceptar todos los tipos de pases hasta el 31 de diciembre de 2020.

1. **Estamos proporcionando materiales educativos.** Explicamos cómo usar efectivo para pagar la tarifa en el sistema RTS Go, cómo agregar montos en efectivo a una tarjeta RTS Go y cómo usar la tarjeta RTS Go para obtener la tarifa más barata. La tarjeta RTS Go funciona como un Pase ilimitado para todo el día luego de tres o más viajes realizados el mismo día. La información está disponible en myRTS.com, arriba de los autobuses, en el Boletín electrónico de novedades y en el RTS Transit Center.
2. **Estamos brindando cuatro opciones de pago en efectivo a los clientes.** Puede usar efectivo para:
  - Pagar por un viaje único en los dispositivos de pago de tarifas.
  - Comprar un Pase ilimitado para todo el día en un dispositivo de pago de tarifas.
  - Comprar un viaje único en una máquina expendedora de boletos.
  - Agregarle un monto a una tarjeta RTS Go a través de una máquina expendedora de boletos.
3. **Estamos manteniendo las máquinas expendedoras de boletos en las mismas ubicaciones.** Las máquinas permanecen en la recepción central de RTS Transit Center y del edificio de la administración de RTS.
4. **Estamos eximiendo del pago de cargos.** Una nueva tarjeta RTS Go incluye un cargo de \$2 por la tecnología de tarjeta inteligente. Eximiremos del pago de cargos desde el 15 de julio hasta el 31 de diciembre de 2020. Luego del 31 de diciembre de 2020, lo eximiremos del pago del cargo cuando compre una nueva tarjeta RTS Go y le cargue un monto de \$20 o más.
5. **Estamos aceptando todos los pases válidos hasta fin del año calendario.** Hasta el 31 de diciembre de 2020, puede continuar usando en el nuevo sistema las tarjetas Tap & Go! o On-Board Issue Change que ya tiene.

\* Los clientes con bajos ingresos tienen ingresos familiares que se encuentran por debajo de las pautas de la pobreza establecidas por el Departamento de Salud y Servicios Sociales (Department of Health and Human Services).



(12) RTS Access eligibility renewal form and RTS Access application for temporary certification.

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**RENOVACIÓN DE LA CERTIFICACIÓN DE ELEGIBILIDAD PARA TODOS LOS VIAJES EN EL SERVICIO DE TRANSPORTE PÚBLICO DE PARATRÁNSITO**

Nombre: \_\_\_\_\_ Fecha de nacimiento: \_\_\_\_\_  
 Números de teléfono: \_\_\_\_\_  
 Teléfono residencial: \_\_\_\_\_ Teléfono celular: \_\_\_\_\_  
 Correo electrónico: \_\_\_\_\_  
 Dirección: \_\_\_\_\_  
 Contacto de emergencia y relación con la persona de contacto: \_\_\_\_\_  
 Número(s) de teléfono: \_\_\_\_\_

1. Utilizo lo siguiente como asistente:

☐ Bastón  
☐ Caminador  
☐ Prótesis  
☐ Máquina de oxígeno o respirador portátiles

2. Describa cualquier cambio en su condición de discapacidad: \_\_\_\_\_

3. Debido a mi discapacidad, ¿necesito un formato alternativo? ☐ No ☐ Sí  
 En caso afirmativo, indique el formato: \_\_\_\_\_

4. ¿Desea que le enviemos información por correo electrónico?

☐ A mí, el solicitante ☐ A la persona de contacto

Nombre del designado: \_\_\_\_\_  
 Dirección del designado: \_\_\_\_\_  
 Correo electrónico del designado: \_\_\_\_\_

Firma del cliente o representante: \_\_\_\_\_

**Para programar su cita de renovación, seleccione la opción n.º 2.**


**ACCESS Solicitud de elegibilidad temporaria para el servicio de transporte público de paratransito**

Fecha: \_\_\_\_\_ Fecha de nacimiento: \_\_\_\_\_  
 Nombre: \_\_\_\_\_ Correo electrónico: \_\_\_\_\_  
 Número de teléfono residencial: \_\_\_\_\_ Número de teléfono móvil: \_\_\_\_\_  
 Dirección postal: \_\_\_\_\_

1. Solicito la certificación de elegibilidad temporaria para el servicio de transporte público de paratransito porque:

\_\_\_\_\_

2. Actualmente uso, o necesitaré usar, las siguientes asistencia para mi movilidad:

<input type="checkbox"/> Bastón	<input type="checkbox"/> Máquina de oxígeno portátil o respirador	<input type="checkbox"/> Asistente de cuidado personal
<input type="checkbox"/> Muletas	<input type="checkbox"/> Silla de ruedas manual	<input type="checkbox"/> Animal de servicio
<input type="checkbox"/> Caminador	<input type="checkbox"/> Silla de ruedas motorizada o carrito motorizado	<input type="checkbox"/> No corresponde
<input type="checkbox"/> Prótesis	<input type="checkbox"/> Silla de ruedas de 24 a 34 pulgadas de ancho	<input type="checkbox"/> Otra respuesta: _____

3. Firma del solicitante: \_\_\_\_\_

**Certificación de médico tratante**

Duración del tratamiento o la recuperación: \_\_\_\_\_

Nombre del médico tratante: \_\_\_\_\_

Número de certificación o número de licencia del estado de Nueva York: \_\_\_\_\_

Certifico (1) la veracidad del motivo por el que se solicita la elegibilidad temporaria y (2) que el solicitante no puede utilizar los servicios de autobús de ruta fija RTS durante el periodo de recuperación debido a esta discapacidad temporaria.

Firma del médico tratante: \_\_\_\_\_ Fecha: \_\_\_\_\_

Envíe el formulario completo por correo a: RTS Access, 1372 E. Main St. Rochester, NY 14609  
 O envíe el formulario completo por correo electrónico a: [access@myrts.com](mailto:access@myrts.com)

Formulario de elegibilidad temporaria para el servicio de transporte público de paratransito. Versión: 1.0. Fecha de vigencia: 01/01/2023

# Total Completes

Wave	Interviewing Dates	Total Completes	Wave	Interviewing Dates	Total Completes
Wave 1	September 16 – September 30, 2010	529	Wave 26	December 10 – December 15, 2016	540
Wave 2	December 8 – December 22, 2010	531	Wave 27	March 4 – March 9, 2017	522
Wave 3	March 14 – March 28, 2011	526	Wave 28	May 5 - May 11, 2017	535
Wave 4	June 3 – June 16, 2011	542	Wave 29	August 5 – August 9, 2017	503
Wave 5	August 17 – August 25, 2011	588	Wave 30	November 1 – November 5, 2017	547
Wave 6	December 5 – December 15, 2011	592	Wave 31	February 7 – February 11, 2018	517
Wave 7	March 7– March 19, 2012	545	Wave 32	April 25 - April 29, 2018	532
Wave 8	June 4 – June 15, 2012	575	Wave 33	August 1 – August 5, 2018	543
Wave 9	October 1 – October 14, 2012	403	Wave 34	November 14 – November 19, 2018	531
Wave 10	December 4 – December 21, 2012	557	Wave 35	February 6 – February 10, 2019	547
Wave 11	March 4 – March 17, 2013	117	Wave 36	May 7 – May 13, 2019	537
Wave 12	June 10 – June 26, 2013	408	Wave 37	August 15 – 19, 2019	494
Wave 13	September 18 – October 6, 2013	445	Wave 38	November 14 – November 18, 2019	520
Wave 14	December 3 – December 23, 2013	428	Wave 39	February 13 – 19, 2020	535
Wave 15	March 15 – March 22, 2014	432	Wave 40	August 13 – 17, 2020	516
Wave 16	June 21 – June 26, 2014	493	Wave 41	November 12 – November 16, 2020	511
Wave 17	September 13 – September 18, 2014	496	Wave 42	February 11 - February 15 2021	509
Wave 18	December 13 – December 18, 2014	500	Wave 43	June 17 – June 21 2021	516
Wave 19	March 14 – March 18, 2015	500	Wave 44	August 13 – August 16 2021	523
Wave 20	June 20 – June 24, 2015	493	Wave 45	October 21 – October 2021	520
Wave 21	September 19 – September 23, 2015	550	Wave 46	February 9 – February 12 2022	515
Wave 22	December 12 – December 16, 2015	551	Wave 47	May 18 – May 21, 2022	531
Wave 23	March 5 – March 10, 2016	546	Wave 48	August 18 – August 27, 2022	513
Wave 24	June 18 – June 22, 2016	547	Wave 49	November – November , 2022	528
Wave 25	September 24 – September 28, 2016	560			

- There are 528 completed surveys for Wave 49.
- A total of 24,511 face-to-face onboard interviews have been completed on RTS buses over the course of 49 waves.
- The individual counts by wave and fielding dates are shown in the table.

# Completes by Route

Route	Description	Surveys	Daypart
1	St. Paul	14	Weekday PM
2	North Clinton	13	Weekend
3	Joseph	18	Weekday AM
4	Hudson	32	Weekday Midday
5	Portland	19	Weekday PM
6	North Goodman	11	Weekend
7	Clifford/Empire	14	Weekday AM
8	East Main	39	Weekday Midday
9	University	9	Weekday PM
10	Park	13	Weekend
11	Monroe	25	Weekday AM
12	South Clinton	20	Weekday Midday
13	South Ave.	12	Weekday PM
14	Marketplace	21	Weekend
15	Plymouth	13	Weekday AM
16	Genesee	45	Weekday Midday
17	Jefferson/19 <sup>th</sup> Ward	15	Weekday PM
18	Chili	27	Weekend
19	Buffalo Rd.	16	Weekday AM
20	Lyell	48	Weekday Midday
21	Dewey	41	Weekday PM
22	Lake	22	Weekend
23	West Ave./Airport	12	Weekday AM
40	Ridge Crosstown	6	Weekday Midday
41	Culver/Goodman Crosstown	10	Weekday PM
50	Fairport/Penfield	8	Weekday Midday
96	St. Joh Fisher Express Commuter	5	Weekday AM

# Demographic Profile of Customers

	TOTAL 38-49	W49	W48	W47	W46	W45	W44	W43	W42	W41	W40	W39	W38
BASE	6237	528	513	531	515	520	523	516	509	511	516	535	520
He/Him	56%	47%	57%	55%	61%	55%	57%	57%	61%	57%	57%	59%	53%
She/Her	42%	44%	42%	44%	38%	44%	42%	41%	38%	42%	40%	40%	45%
They/Them	4%	4%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Prefer not to say	2%	6%	3%	3%	*	1%	3%	4%	2%	2%	1%	1%	1%
Other	1%	1%	1%	1%	1%	2%	1%	2%	1%	1%	1%		
<18	*	*	*	*	*	*	*	*	*	*	*	*	*
18 – 29	23%	27%	22%	22%	22%	24%	21%	20%	21%	24%	20%	26%	27%
30 – 39	18%	22%	18%	21%	18%	20%	18%	13%	17%	16%	15%	18%	18%
40 – 49	16%	16%	15%	20%	19%	17%	14%	15%	16%	16%	16%	15%	17%
50+	36%	35%	36%	37%	42%	39%	37%	39%	35%	33%	39%	34%	32%
Did not answer/ Refused	11%	20%	8%	15%	10%	9%	9%	13%	11%	7%	9%	8%	7%
Asian	2%	2%	2%	2%	1%	2%	2%	1%	2%	1%	2%	1%	2%
Hispanic/Latino	13%	14%	11%	13%	12%	18%	11%	13%	11%	11%	13%	-	-
White	30%	29%	31%	27%	31%	30%	29%	32%	27%	35%	33%	28%	29%
Middle Eastern	1%	1%	1%	2%	2%	1%	1%	1%	1%	1%	1%	1%	2%
American Indian/Alaskan	3%	6%	2%	3%	3%	3%	3%	3%	3%	4%	3%	3%	4%
Black/African American	51%	53%	54%	53%	52%	53%	51%	44%	53%	47%	46%	51%	50%
West Indian/ Caribbean	2%	2%	2%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Other	6%	2%	6%	2%	5%	4%	7%	5%	8%	4%	6%	4%	14%
Did not answer / Refused	4%	6%		3%	2%	3%	6%	6%	4%	4%	3%	3%	4%



# Demographic Profile of Customers

	TOTAL 38-49	W49	W48	W47	W46	W45	W44	W43	W42	W41	W40	W39	W38
BASE	6237	528	513	531	515	520	523	516	509	511	516	535	520
Chinese	1%	2%	1%	*	*	1%	*	1%	*	*	2%	1%	2%
English	89%	90%	91%	91%	87%	88%	88%	87%	89%	93%	89%	89%	91%
Italian	1%	2%	1%	*	*	*	1%	1%	1%	1%	*	1%	1%
Hindu-Urdu	1%	1%	1%	*	*	*	1%	1%	2%	1%	1%	*	*
Spanish	8%	8%	8%	10%	10%	8%	8%	8%	6%	5%	6%	8%	8%
Vietnamese	1%	1%	*	1%	1%	1%	1%	1%	1%	1%	*	1%	1%
Other	2%	2%	2%	2%	2%	1%	3%	2%	3%	1%	3%	2%	2%
Did not answer/ Refused	3%	7%	-	3%	1%	1%	4%	4%	3%	3%	4%	1%	2%
Difficulty w/ English - Yes	36%	40%	31%	-	-	-	-	-	-	-	-	-	-
Difficulty w/ English - No	64%	60%	69%	-	-	-	-	-	-	-	-	-	-
Did not answer/ Refused	12%	16%	7%	-	-	-	-	-	-	-	-	-	-
Condition - Yes	18%	16%	21%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Condition - No	82%	84%	79%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Did not answer/ Refused	12%	16%	7%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

# Demographic Profile of Customers

	TOTAL 38-49	W49	W48	W47	W46	W45	W44	W43	W42	W41	W40	W39	W38
BASE	6237	528	513	531	515	520	523	516	509	511	516	535	520
Under \$15K	48%	52%	48%	48%	52%	50%	47%	46%	50%	51%	45%	49%	44%
\$15K - \$25K	15%	14%	15%	14%	14%	12%	14%	15%	13%	21%	16%	16%	16%
\$25K - \$50K	23%	24%	28%	29%	23%	21%	21%	20%	22%	21%	21%	18%	25%
\$50K - \$75K	5%	5%	6%	5%	3%	4%	4%	4%	5%	5%	5%	4%	5%
Above \$75K	3%	5%	3%	3%	2%	2%	3%	3%	2%	2%	2%	4%	4%
Did not answer/ Refused	11%	14%	9%	11%	8%	11%	12%	12%	9%	13%	11%	9%	7%
Employed Full-Time	34%	34%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Employed Part-Time	18%	18%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Self-employed	6%	6%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Contract Employee	2%	2%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Unemployed	18%	18%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Student Full-time	9%	9%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Student Part-time	5%	5%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Other	8%	8%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
None of the above	7%	7%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Did not answer/Refused	9%	9%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

# Performance Metrics: Waves 38 - 49

	TOTAL 38-49	W49	W48	W47	W46	W45	W44	W43	W42	W41	W40	W39	W38
BASE	6237	528	513	531	515	520	523	516	509	511	516	535	520
PERFORMANCE													
Overall performance	8.0	8.2	8.2	7.6	8.0	7.5	8.1	7.9	8.0	8.2	8.2	8.0	7.9
Buses arrive on time	7.9	8.6	7.7	7.6	7.9	7.8	8.0	8.0	N/A	N/A	N/A	N/A	7.6
Bus cleanliness	7.5	7.7	7.4	7.4	N/A	N/A	N/A	N/A	7.3	7.9	7.8	N/A	6.9
Level of crowding on the bus	7.5	7.9	7.3	7.3	N/A	N/A	N/A	N/A	7.6	7.9	7.7	N/A	6.8
Bus comfort	7.8	8.0	7.7	7.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	7.6
Personal safety/security	8.1	8.1	7.8	-	N/A	N/A	N/A	N/A	8.0	8.4	8.1	N/A	N/A
Time spent riding on the bus.	8.2	8.2	-	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Bus Frequency.	7.9	8.1	7.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Route Coverage.	7.6	-	7.6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
OPERATORS													
Operator performance	7.9	N/A	7.7	7.7	7.9	7.7	8.3	8.1	N/A	N/A	N/A	N/A	N/A
Help finding answers	7.9	N/A	7.9	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Drivers deliver a smooth and safe ride to my destination.	8.5	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	8.5	N/A
Drivers greeted me with a smile when I got on the bus.	7.9	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	7.9	N/A
SYSTEM, TOOLS, & SERVICES													
Ease of buying fare	8.3	-	8.3	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ease of getting info from RTS	8.1	-	7.9	8.0	8.2	8.0	8.2	N/A	N/A	N/A	N/A	N/A	N/A
Ease of understanding which bus to board and where it goes.	8.1	-	7.8	8.0	8.2	8.1	8.6	N/A	N/A	N/A	N/A	N/A	N/A

## EXHIBITS

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# Exhibit 09: Facility Site Reports



## TITLE VI EQUITY ANALYSES FOR FACILITY SITE LOCATIONS

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## OVERVIEW

### 1.0. Background

The Rochester Genesee Regional Transportation Authority (“RGRTA” or “the Authority” or “we”) is a public benefit corporation and a component unit of the State of New York. The Authority is charged with the continuance, further development, and improvement of public transportation and other related services within the Genesee/Finger Lakes region. Membership in the Authority has grown to eight counties with a total land area of 4,350 square miles and population of approximately 1.2 million. Member counties include Genesee, Livingston, Monroe, Ontario, Orleans, Seneca, Wayne, and Wyoming. RGRTA oversees the daily operation of ten subsidiaries.

The following planned facility projects shall require Title VI equity analyses during site selection.

1. New facility for RTS Access paratransit operations, including bus maintenance and storage.
2. New Zero-Emission Depot to support a zero-emission RTS Connect bus fleet by 2035.
3. New RTS Seneca facility with bus storage, administrative offices, and bus wash area.
4. New RTS Genesee facility with bus storage, administrative offices, and bus wash area.
5. New RTS Wayne facility with bus storage, administrative offices, bus wash area, and electric vehicle charging station.

The subjects of this equity analysis report are RTS, RTS Access, RTS Genesee, RTS Seneca, and RTS Wayne.

County	Subsidiary	Service
Monroe	RTS (Regional Transit Service, Inc.)	Fixed route (RTS Connect) Demand responsive (RTS On Demand)
	RTS Access (Lift Line, Inc.)	Complementary paratransit
Genesee	RTS Genesee (Batavia Bus Service)	Route deviation Demand responsive (Dial-A-Ride)
Seneca	RTS Seneca (Seneca Transit Services)	
Wayne	RTS Wayne (Wayne Area Transportation Service, Inc.)	

### 2.0. Compliance with the Title VI Requirement for Facility Site Locations

We are committed to ensuring that no person is excluded from participation in, or denied the benefits of, its transit services based on race, color, or national origin as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B.

Title 49 CFR Section 21.5(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 of 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 that, "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."

The *RGRTA Major Service Change, Disparate Impact, and Disproportionate Burden* policies define thresholds to determine whether proposed major service changes or fare changes have a disparate impact on customers protected under Title VI (race, color, national origin) or impose a disproportionate burden on low-income customers. As these thresholds are well-defined, we applied them to our equity analysis for facilities as an indication of whether a facility will result in adverse effect on populations in the area of a site location.

## OVERVIEW

### 3.0. Methodology and Data Sources

Per guidance in the Title VI circular, the facility site equity analysis must:

- a. Include outreach to persons potentially impacted by the siting of the facility.
- b. Compare impacts of various siting alternatives.
- c. Determine if cumulative adverse impacts might result due to the presence of other facilities with similar impacts in the area.
- d. Occur before the selection of the preferred site.
- e. Implement the least discriminatory alternative if disparate impacts are identified.

Each facility site equity analysis includes the following steps:

1. Apply site selection criteria to each potential location and rate it with a score. Only sites with an acceptable score will move to the next stage of analysis.
2. Identify the populations in the census tract blocks of a potential site location: Ethnic and Racial Minority, Low-Income, and Limited English Proficient (LEP).
3. Compare populations of groups protected under Title VI with other groups.
4. Use ACS data at the census tract level for prospective locations.
5. Use ACS data for County census data.
6. Apply established equity % thresholds set in RGRTA's Disparate Impact and Disproportionate Burden policies to determine whether there is a disparate impact or disproportionate burden.

#### 3.1. Disparate Impact

If a proposed site is in a census tract block with a non-white population greater than 20% above the white population, the project is deemed to have a Disparate Impact.

- *Adverse Effect* shall relate to building a facility in a location and shall be measured by racial and ethnic minority populations as compared to white populations.
- *Racial and Ethnic Minority or Non-White* shall mean populations identifying as any of the groups identified through American Community Survey (ACS) census data as a member of one or more groups protected under Title VI.
- *Disparate Impact* shall mean a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where (i) the recipient's policy or practice lacks a substantial legitimate justification; and where (ii) there exists one or more alternatives that would service the same legitimate objectives, but with less disproportionate effect on the basis of race, color, or national origin.

#### 3.2. Disproportionate Burden

If a proposed site is in a census tract block with a Low-Income Population greater than 20% above a Non-Low-Income Population, the project is deemed to have a Disproportionate Burden.

- *Low-Income Population* shall mean an individual whose family income falls within the poverty guidelines, which are a simplified version of the federal poverty thresholds issued each year by the Department of Health and Human Services (HHS).
- *Disproportionate Burden* shall mean an adverse effect that places greater burden on a Low-Income Population versus other economic population groups.

## OVERVIEW

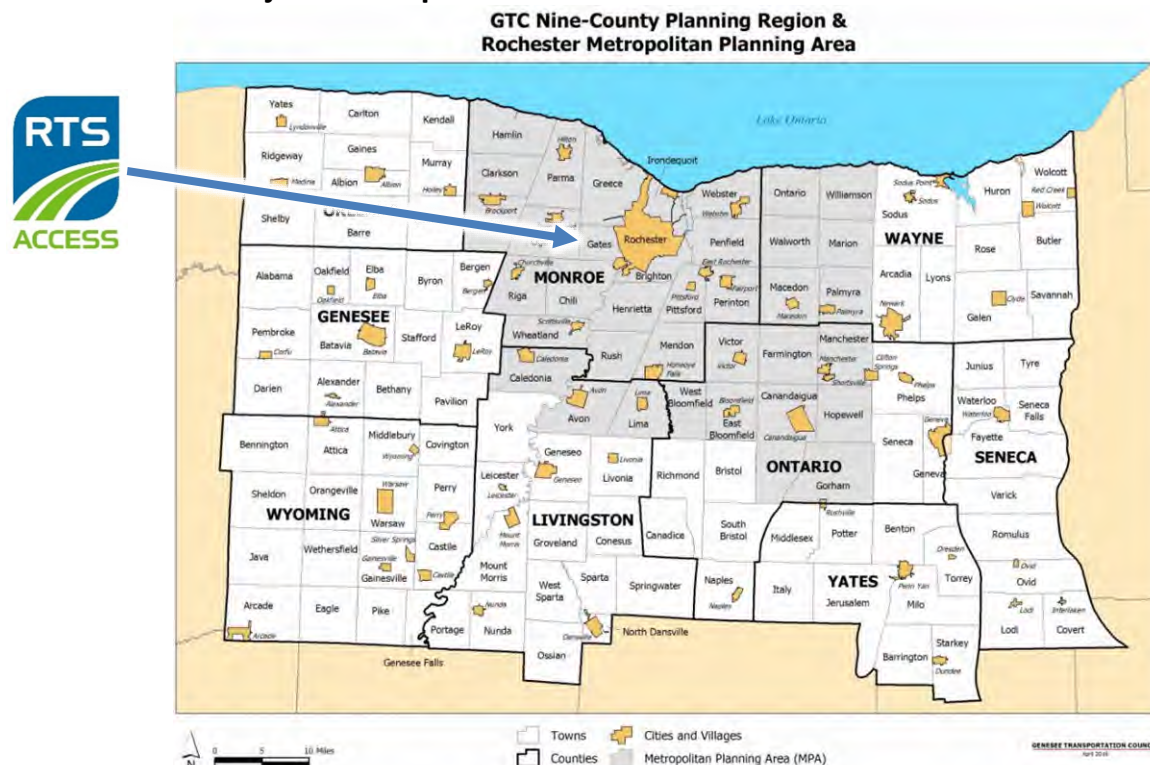
### 3.3. Site Selection Criteria

Potential sites were scored according to the following criteria.

<b>1. Current Ownership</b>	<input type="checkbox"/> Public or privately owned?
<b>2. Availability</b>	<input type="checkbox"/> Is the property owner willing to sell? <input type="checkbox"/> Is it a site that is immediately available?
<b>3. Cost of Acquisition</b>	<input type="checkbox"/> Total cost to acquire the property?
<b>4. Existing Zoning</b>	<input type="checkbox"/> Industrial zone preferred?
<b>5. Adjacent Land Use</b>	<input type="checkbox"/> Near residential neighborhood? <input type="checkbox"/> Neighborhood Impacts? <input type="checkbox"/> Provides efficiencies with an existing location?
<b>6. Utility Availability</b>	<input type="checkbox"/> Access to water, sewer, and fuel (Natural gas)?
<b>7. Major Street Access</b>	<input type="checkbox"/> Proximity to major highway?
<b>8. Environmental Impacts</b>	<input type="checkbox"/> Is environmental mitigation necessary? – Water Resources & Water Quality – Haz Materials/Brown Field – Floodplains – Farmlands – Wetlands – Areas of Critical Environmental Concern/Threatened & Endangered Species (ACEC/T&E) – Noise – Historic and Cultural Resources – Open Space [including Section 4(f) and Section 6(f)] – Environmental Justice (EJ)
<b>9. Local Traffic Impact</b>	<input type="checkbox"/> Will the project have adverse impacts on adjacent traffic patterns? <input type="checkbox"/> Will improvements be necessary to accommodate the project?
<b>10. Size</b>	<input type="checkbox"/> Is the parcel large enough to develop the facility with desired amenities? <input type="checkbox"/> Expansion? <input type="checkbox"/> Usable acreage
<b>11. Safety</b>	

# RTS ACCESS FACILITY SITE LOCATION REPORT

## 1.0. RTS Access Project Description



Service	Current Facility Location	Facility Problems	Proposed Solutions
Complementary paratransit	<ul style="list-style-type: none"> <li>588 Trabold Road Town of Gates.</li> <li>On approximately 3.19 acres.</li> </ul>	<ul style="list-style-type: none"> <li>30 years old and run down</li> <li>Undersized</li> <li>Flood zone</li> </ul>	<ul style="list-style-type: none"> <li>Relocate to alternative facility; or</li> <li>Identify a new site; would need 5 to 6 acres of land and 65,000 feet of new facility.</li> </ul>

- **Service:** RTS Access | Complementary paratransit
- **Current Facility Location:** 588 Trabold Road between Trabold and the I-490/NY-204 interchange ramp south of the CSX Transportation rail line in the Town of Gates. The facility is on 3.19 acres. The facility stores, maintains, and fuels the fleet of 20-foot and 22-foot buses. The property contains a bus storage building, an administrative and maintenance building, on site fueling operations and associated paved areas for parking and vehicle circulation. All RTS Access Bus Operators are assigned their work/vehicles and dispatched from the location. There is extremely limited space for mechanics, dispatchers, and the Operations Manager.
- **Problems:** The facility is 30 years old, undersized, in a state of significant disrepair despite ongoing maintenance, and in a flood zone. The facility lacks an appropriate location to conduct in-person functional assessments for eligibility certification. All functional assessments and eligibility interviews are done 10 miles away at RGRTA headquarters in the RTS Administrative Building located on 1372 East Main Street, Rochester NY. In 2018, conditions became egregiously overcrowded. All trip Schedulers, ADA Management, ADA Coordinators, and the Director of Paratransit Services moved into temporary spaces at RGRTA headquarters, where they currently remain.



## RTS ACCESS FACILITY SITE LOCATION REPORT



Figure 1—Top-down view of 588 Trabold Road and the RTS Access Facility

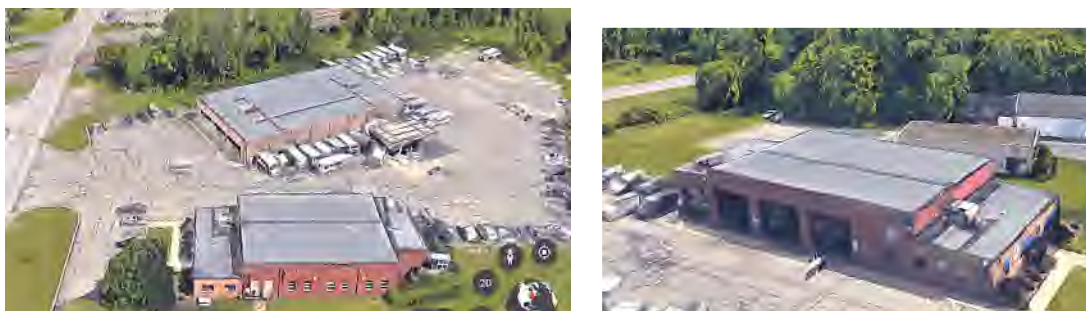


Figure 2—Additional views of the campus and the Administration/Maintenance building

In the winter of 2018, we retained an architecture, engineering, energy efficiency and construction management firm (“Wendel”) to conduct a Paratransit Demand Based Services and Facilities evaluation of the RTS Access facility. The objective was to identify the most suitable geographic and facility requirements to sustain paratransit services to the community for the next 20 years and beyond.

### 2.0. Site Identification

Wendel’s study proposed that a new RTS Access facility would require approximately 5 to 6 acres of land and 65,000 square feet of new building. We engaged a local real estate professional to identify available sites greater than four acres. Thirty-nine potential sites were identified. After applying the Site Selection Criteria, we determined that seven sites were viable for further evaluation. The seven sites were ranked based on size, cost rating, presence of a facility/building, traffic disruption, main thoroughfare access, and the calculated center of paratransit vehicle operation (number of non-revenue miles and hours). The scores left four potential sites.

We reviewed the sites for cumulative impacts that might adversely affect the communities. There would be no displacement of residents or businesses at the four locations considered for site selection: Site A—1500-1600 Lexington Avenue, Census Tract 141.04; Site B—898 Buffalo Road, Census Tract 143.02; Site C—350 Buell Road, Census Tract 144; and Site D—28 Paul Road, Census Tract 146.02.

## RTS ACCESS FACILITY SITE LOCATION REPORT

Site A—1500-1600 Lexington Avenue, Census Tract 141.04		
Who is impacted by selecting this site?	<ul style="list-style-type: none"><li>Approximately 250 residences less than 1 mile away</li><li>Edison Career &amp; Technology High School across the street</li></ul>	
Will selecting this site displace residents or businesses?	No	
List other similar facilities nearby (maintenance, storage, and operations)	<ul style="list-style-type: none"><li>Amazon Delivery Station</li><li>Acquest South Park Industrial Space (storage facility and parking lot) which houses a warehouse, tire wholesale warehouse, hardware store, brewery warehouse, metal fabricator, courier transportation service, a food manufacturer, truck and trailer repair shop, a logistics service, and a gasket manufacturer.</li><li>Ontario Bus Inc., school transportation service</li></ul>	
Site B—898 Buffalo Road, Census Tract 143.02		
Who is impacted by selecting this site?	<ul style="list-style-type: none"><li>Approximately 86 residences on Varian Lane and Dearcop Drive</li><li>Nearby businesses</li></ul>	
Will selecting this site displace residents or businesses?	No	
List other similar facilities nearby (maintenance, storage, and operations)	<ul style="list-style-type: none"><li>Construction, paving and asphalt companies.</li></ul>	
Site C—350 Buell Road, Census Tract 144		
Who is impacted by selecting this site?	Nearby businesses	
Will selecting this site displace residents or businesses?	No	
List other similar facilities nearby (maintenance, storage, and operations)	<ul style="list-style-type: none"><li>Bus Charter Company</li><li>Self-Storage Facility</li><li>Rental Car Companies</li><li>Rental Car Garage (mechanic/repairs)</li><li>Car Leasing Company</li></ul>	<ul style="list-style-type: none"><li>Airport Shuttle Parking Lots</li><li>Auto Parts Manufacturer</li><li>Metal Finisher</li><li>Greater Rochester International Airport</li></ul>
Site D—350 Buell Road, Census Tract 144		
Who is impacted by selecting this site?	Nearby businesses	
Will selecting this site displace residents or businesses?	No	
List other similar facilities nearby (maintenance, storage, and operations)	<ul style="list-style-type: none"><li>Tiffany Transportation Bus Charter service</li><li>Auto &amp; Heavy Truck Repair</li><li>Truck Parks Supplier</li><li>Industrial fluid mixer development lab</li></ul>	<ul style="list-style-type: none"><li>Towing Service</li><li>Tool Manufacturers</li><li>Machining for Automotive, Energy, Medical, Off Highway Vehicle, Oil &amp; Gas, and Rail</li><li>Custom Machined Parts Manufacturer</li></ul>

All locations have facilities related to maintenance, storage, or manufacturing nearby. The areas are typically industrial. However, Site A and Site B have nearby residential areas which could be impacted by the cumulative effect of bus traffic or emissions.



## RTS ACCESS FACILITY SITE LOCATION REPORT

(1) Lexington Site

(2a) Acquest Industrial Park

(2b) Ontario Bus Company,  
Amazon Delivery Station

(3) Residential area Census  
Tract 88.01

(4) Edison Career and  
Technology High School



Figure 3—Top-down view of the Lexington location with surrounding similar facilities, residential area, and Edison High School

We engaged an architecture, engineering, and construction management firm (“LaBella Associates”) to perform preliminary concept designs (30%) between August 2021 to December 2021. The diagrams and renderings assisted us with determining with greater precision what the operational flow could be like and the most efficient layout for the desired components.

In January 2022, we engaged an architecture, engineering, and construction management firm (“LaBella Associates”) to conduct a study to identify traffic-related impacts that would result from the 1500 Lexington Avenue site location. The study assumed a new RTS Access facility would accommodate 120 employees, 100 buses and up to 6 parking spaces for visitors. The study focused on 1500-1600 Lexington Avenue bounded by Lexington Avenue to the south and Fisher Street to the east. Lexington Avenue runs east-west and is classified as a Minor Arterial street with an Annual Average Daily Traffic (AADT) of 13,000 vehicles per day (2019 NYSDOT data). Fisher Street is a local road, used to access a warehouse in the rear. Colfax Street is a local road which runs south of Lexington Avenue and provides access to the Edison Technology High School and Emerson Street to the south. All roads in the study area are owned by the City of Rochester.

The study area solely included the signalized intersection of Lexington Avenue and Fisher Street/Colfax Street. The study used Tri-State Traffic Data to analyze traffic operation during the typical morning and afternoon peak commuter periods. The peak hours for analysis were determined to be 7:00-8:00 AM and 4:00-5:00 PM.

Vehicular trips to and from the proposed site were distributed onto the highway network using existing traffic characteristics and likely routes to destinations. Trips were assigned to the two site access points based on the type of driveway analyzed. Weekday RTS Access bus trip data was provided and analyzed to determine the number of employees and buses using the driveways during peak hours.

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## RTS ACCESS FACILITY SITE LOCATION REPORT

Analysis Hour	Leaving	Returning	In Service	Analysis Hour	Leaving	Returning	In Service
4 AM	4	0	4	3 PM	0	4	39
5 AM	15	0	19	4 PM	1	12	28
6 AM	4	0	23	5 PM	3	13	18
7 AM	6	0	29	6 PM	0	7	11
8 AM	8	4	33	7 PM	0	2	9
9 AM	5	4	34	8 PM	0	3	6
10 AM	5	10	29	9 PM	0	4	2
11 AM	1	3	27	10 PM	0	1	1
12 PM	7	5	29	11 PM	0	0	1
1 PM	15	4	40	12 AM	0	1	0
2 PM	4	1	43				

Figure 4—Data Table from Traffic Study showing projected peak bus trips.

The study projected the number of entering and exiting vehicle trips during the morning and afternoon peak hours. The study accounted for employees driving personal vehicles to and from work and driving revenue vehicles in service. The study assumed that the facility would have two driveways. Both driveways would originate from Fisher Street. One driveway would lead to an employee parking lot. The second driveway would be for RTS Access buses to travel to and from the storage and maintenance areas. An entering trip starts from Lexington Avenue and travels north-east onto Fisher Street. An exiting trip starts from Fisher Street and travels east-west on Lexington Avenue.

Analysis Hour	RTS Employee Driveway		RTS Bus Driveway	
	Entering Trips	Exiting Trips	Entering Trips	Exiting Trips
AM (7:00 - 8:00)	53	16	4	14
PM (4:00-5:00)	13	49	25	4

Figure 5—Data Table from Traffic Study summarizing entering/exiting vehicles during peak hours.

LaBella performed a capacity analysis of the studied intersections using traffic analysis software (“Synchro”). The capacity analysis uses Level of Service (LOS), which is an indication of the amount of delay a driver is likely to experience.

Level of Service is reported using six letters ranging from “A” to “F” that correspond with the average delay that a vehicle is expected to experience. Level of Service “A” indicates nearly free-flow operation with minimal delay, while Level of Service “F” indicates significant congestion and delay.

Level of Service	Signalized Intersection Control Delay per Vehicle (seconds)	Intersection	Approach	Turning Movement	Peak Hour	LOS (Delay) Existing	LOS (Delay) Background	LOS (Delay) Full Development
A	< 10	Lexington Ave & Fisher St/ Colfax St (Signalized)	Eastbound	Left	AM	A (8.8)	A (8.8)	A (8.6)
B	10 to 20				PM	A (5.5)	A (5.5)	A (5.2)
C	20 to 35		Thru/Right		AM	B (13.1)	B (13.2)	B (13.6)
D	35 to 55				PM	A (8.2)	A (8.3)	A (8.9)
E	55 to 80		Westbound	Left	AM	A (5.5)	A (6.0)	A (6.2)
F	> 80				PM	A (4.1)	A (4.2)	A (6.1)
			Thru/Right		AM	A (6.6)	A (6.7)	A (7.7)
					PM	A (7.1)	A (7.2)	B (10.1)
			Northbound	Left	AM	C (20.7)	C (21.1)	C (20.8)
					PM	B (17.6)	B (17.8)	B (19.1)
			Thru/Right		AM	B (19.4)	B (19.7)	B (19.2)
					PM	B (17.0)	B (17.2)	B (17.9)
			Southbound	Left/Thru/Right	AM	B (18.2)	B (18.5)	B (18.7)
					PM	B (17.5)	B (17.7)	C (20.8)
			Overall Intersection		AM	<b>B (11.5)</b>	<b>B (11.8)</b>	<b>B (12.1)</b>
					PM	<b>A (9.1)</b>	<b>A (9.2)</b>	<b>B (11.1)</b>

Figure 6—Data Table from Traffic Study summarizing anticipated Level of Service and Delays

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## RTS ACCESS FACILITY SITE LOCATION REPORT

Existing overall LOS is “B” during the AM peak hour and LOS “A” during the PM peak hour, and individual movements operate with LOS “C” or better during the morning and afternoon peak hours.

The conclusion from the traffic study is that operating the RTS Access fleet from the Lexington Avenue site would increase delay slightly during PM peak hours but would not create significant congestion and delay at any time.

Another cumulative impact to consider is air quality due to the number of industrial facilities. RTS Access currently uses gas/diesel buses but is following the path of RTS in the integration of electric buses. An environmental assessment or specific air quality study would provide more information about whether the presence of the RTS Access facility would significantly impact air quality.

### 3.0. Equity Analysis

In March 2022, we performed a Title VI Equity Analysis on the site locations.

Current Site: 588 Trabold Road, Rochester NY 14624 Census Tract 28453

	<b>Site A 1500-1600 Lexington Ave. Census Tract 141.04</b>	<b>Site B 898 Buffalo Rd. Census Tract 143.02</b>	<b>Site C 350 Buell Rd. Census Tract 144</b>	<b>Site D 28 Paul Rd. Census Tract 146.02</b>	<b>Monroe County</b>
<b>Total Population</b>	3649	5035	4810	4455	<b>744,248</b>
<b>White</b>	3291	4173	3795	3719	<b>560,874</b>
<b>Non-White</b>	358	862	1015	736	<b>183,374</b>
<b>Non-White %</b>	9.8%	17.1%	21.1%	16.5%	<b>24.6%</b>
<b>Population under Poverty Line</b>	460	290	383	628	<b>105,226</b>
<b>Percentage under Poverty Line</b>	12.6%	5.8%	8.0%	14.1%	<b>14.6%</b>
<b>Median Income (Households)</b>	\$42,832	\$37,825	\$40,069	\$37,685	<b>\$57,479</b>
<b>LEP %</b>	5.3%	4.8%	1.9%	2.3%	<b>4.0%</b>
<b>Disparate Impact &gt; +/- 20%</b>	NO	NO	NO	NO	
<b>Disproportionate Burden &gt; +/- 20%</b>	NO	NO	NO	NO	

No location triggers the thresholds for disparate impact or disproportionate burden. The Non-White % and Percentage Under the Poverty Line for each location are lower than the Monroe County average of 14.6%.

The poverty populations and percentages, and minority populations and percentages for all sites are below the county level statistics. Median household income for all sites is lower than the county average.

The LEP percentages for 350 Buell Road and 28 Paul Road are significantly lower than the county average, while the percentages for 1500 Lexington Avenue and 898 Buffalo Road are higher. Further examination of 1500 Lexington Avenue census tract LEP data showed that 60% of the LEP households speak an Indo-European language other than Spanish, and the remaining 40% speak an Asian or Pacific Island language. There were zero LEP households in that tract speaking Spanish or a language in the “Other” category.

While 898 Buffalo Road appears to have the lowest low-income/poverty population, it has the second highest non-white population. There are approximately 86 residences located near the site (Dearcop Drive

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## RTS ACCESS FACILITY SITE LOCATION REPORT

and Varian Lane). While 1500-1600 Lexington Avenue appears to have the lowest non-white population, it has the highest LEP population. There are approximately 250 residences located less than a mile from the site at Polaris, Planet, Parkedge, Emerson, and Stenson Streets, Christopher Crt., and Mt. Read Blvd in Census Tract 88.01.

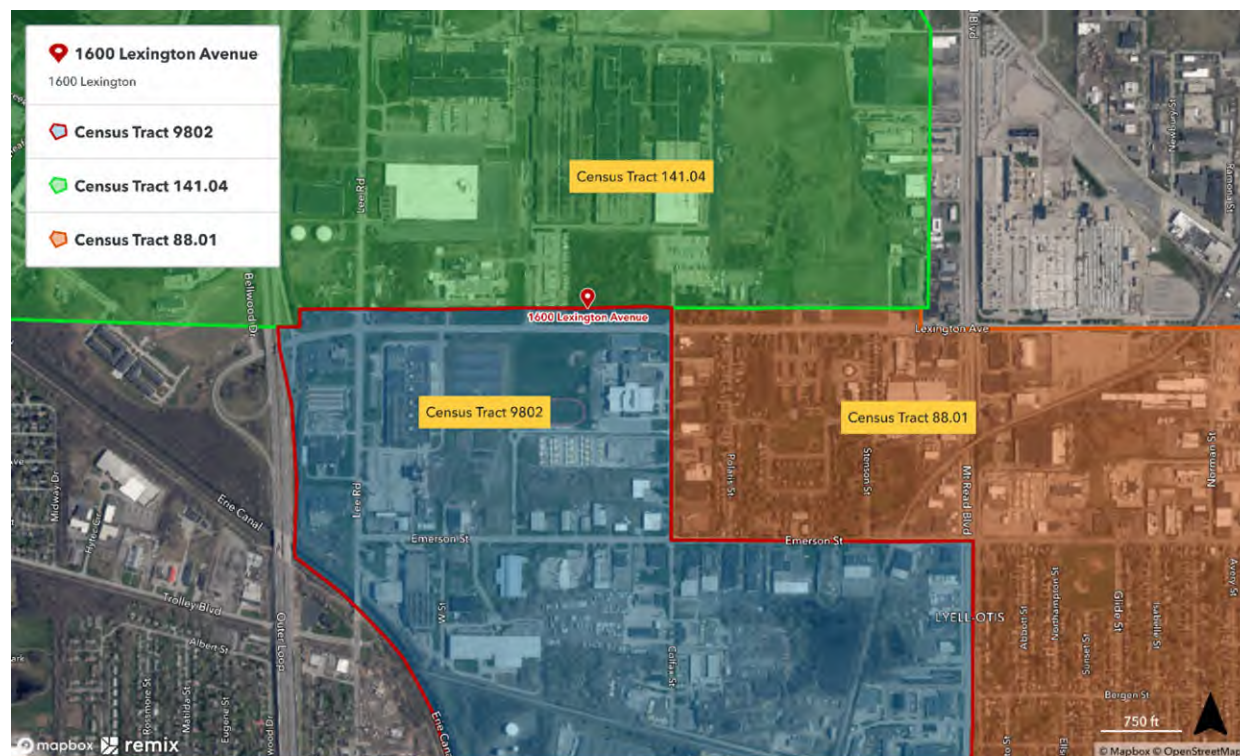


Figure 7—Census Tracts near 1500-1600 Lexington Avenue

Initial public outreach activities held from April to June 2022 yielded low response rates. However, a community resident voiced concerns about the potential to increase congestion near Census Tract 88.01 and noted that these neighborhoods have primarily minority residents. We conducted a second equity analysis in September 2022 which focused on the residential streets within Census Tract 88.01.

## RTS ACCESS FACILITY SITE LOCATION REPORT

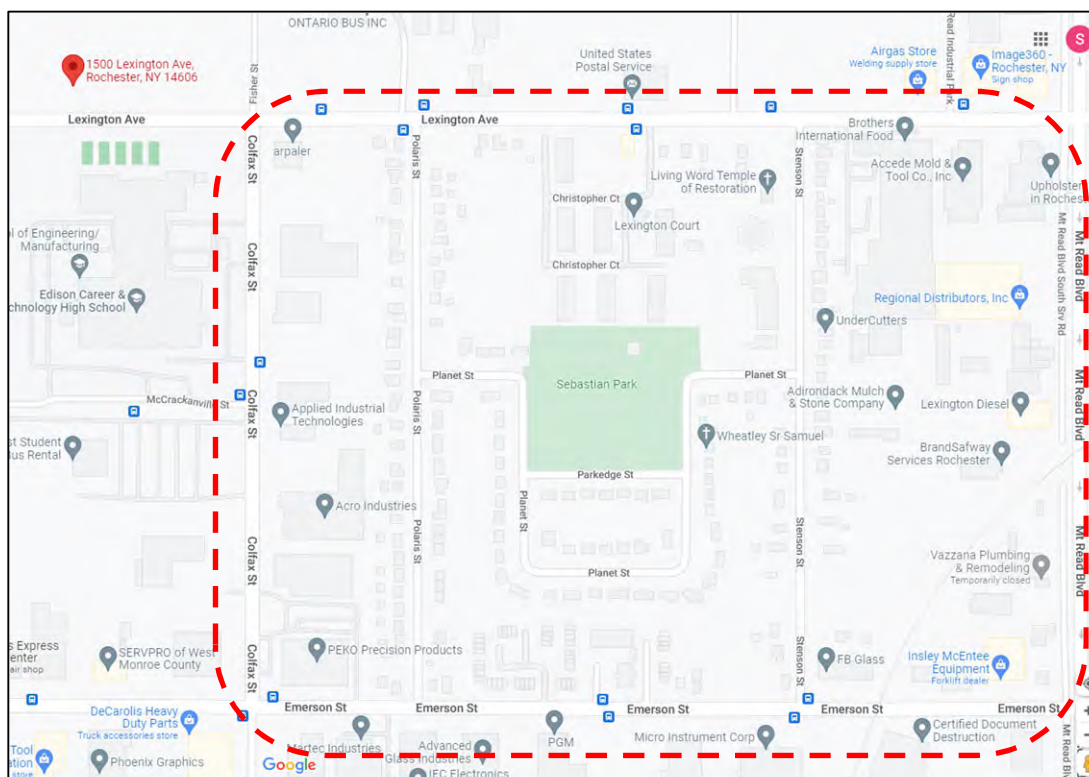


Figure 8—Census Tract 88.01 with approximately 250 residences located on Polaris Street, Planet Street, Parkedge Street, Christopher Ct., Emerson Street, Stenson Street, Mt. Read Blvd between Lexington and Emerson, and Colfax Street between Lexington and Emerson

	1500-1600 Lexington. Census Tract 141.04	Polaris, Planet, Parkedge, Emerson, Stenson Streets   Christopher Crt.   Mt. Read Blvd Census Tract 88.01	Monroe County
<b>Total Population</b>	3649	6004	<b>744,248</b>
<b>White</b>	3291	1575	<b>560,874</b>
<b>Non-White</b>	358	4429	<b>183,374</b>
<b>Non-White %</b>	9.8%	73.77%	<b>24.6%</b>
<b>Population under Poverty Line</b>	460	1654	<b>105,226</b>
<b>Percentage under Poverty Line</b>	12.6%	27.55%	<b>14.6%</b>
<b>Median Income (Households)</b>	\$42,832	\$35,325	<b>\$57,479</b>
<b>LEP %</b>	5.3%	4.60%	<b>4.0%</b>
<b>Disparate Impact &gt; +/- 20%</b>	NO	YES	
<b>Disproportionate Burden &gt; +/- 20%</b>	NO	YES	

The population in Census Tract 88.01 triggers the thresholds for Disparate Impact and Disproportionate Burden. The residential community has the potential for adverse effect from the siting of the RTS Access facility at 1500-1600 Lexington Avenue.

We began a second outreach effort aimed specifically at the residents of Census Tract 88.01 to better understand their concerns, identify specific impacts, and determine whether mitigations are available that address community concerns.

## RTS ACCESS FACILITY SITE LOCATION REPORT

### 4.0. Community Outreach

RGRTA conducted the first round of outreach from April to June 2022 to solicit input about siting the new facility at 1500-1600 Lexington Avenue through the following activities.

Activity	Outcome
Letter to Edison Career and Technology High School Principal soliciting comment	No response.
Letter mailed to RTS Access customers soliciting comment	6 responses. All responses were supportive of the project and positive.
Recorded "On Hold" message for customers calling RTS Access for information or trip reservations soliciting comment	Two customers asked questions specific to the facility and their service. Would the facility accommodate alternate fuel sources for the bus fleet? (Yes) Would applicants/customers be transported free of charge to the location for their in-person eligibility certification interviews or functional assessments? (Yes)
Recorded video presentation on <a href="http://www.myrts.com">www.myrts.com</a> soliciting comment	
Flyer onboard RTS Access buses soliciting comment	
Notices sent through social media and email to RTS Access customers with subscriptions soliciting comment	
Notice in the local newspaper Democrat and Chronicle soliciting comment	1 response. Community resident raised concern for impact to the minority population living in Census Tract 88.01 and the possibility of the facility adding to the traffic congestion caused by Edison High School and the Amazon Delivery Station facilities in the industrial park.

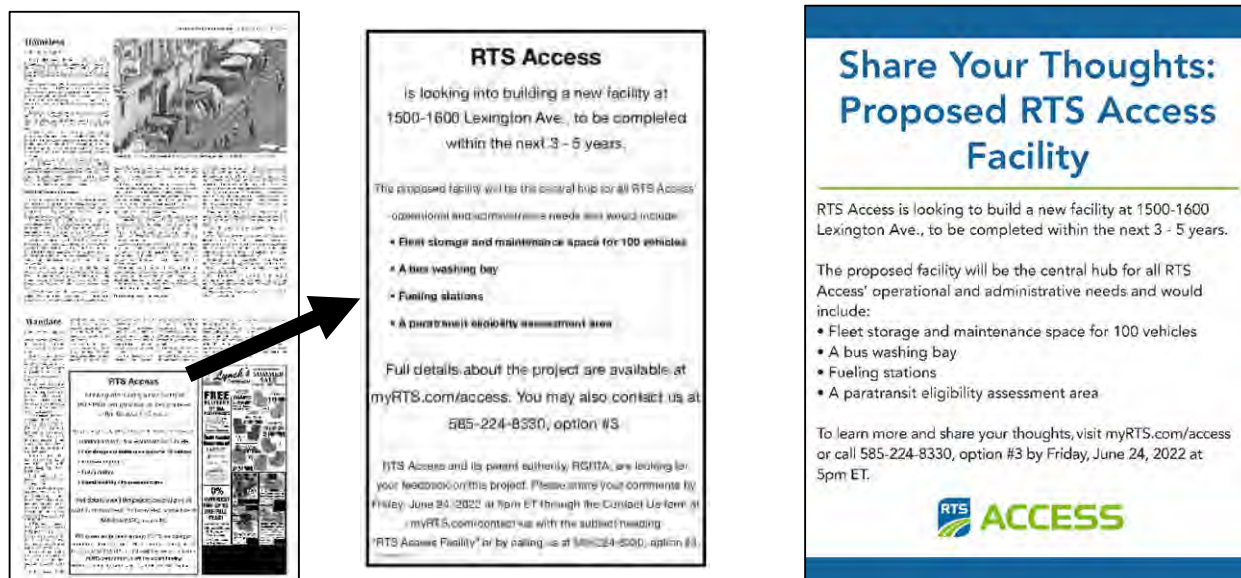


Figure 9—Notice in the June 12, 2022 issue of the Democrat And Chronicle Rochester Newspaper and an example of the Flyer poste onboard RTS Access buses in June soliciting comment



## RTS ACCESS FACILITY SITE LOCATION REPORT

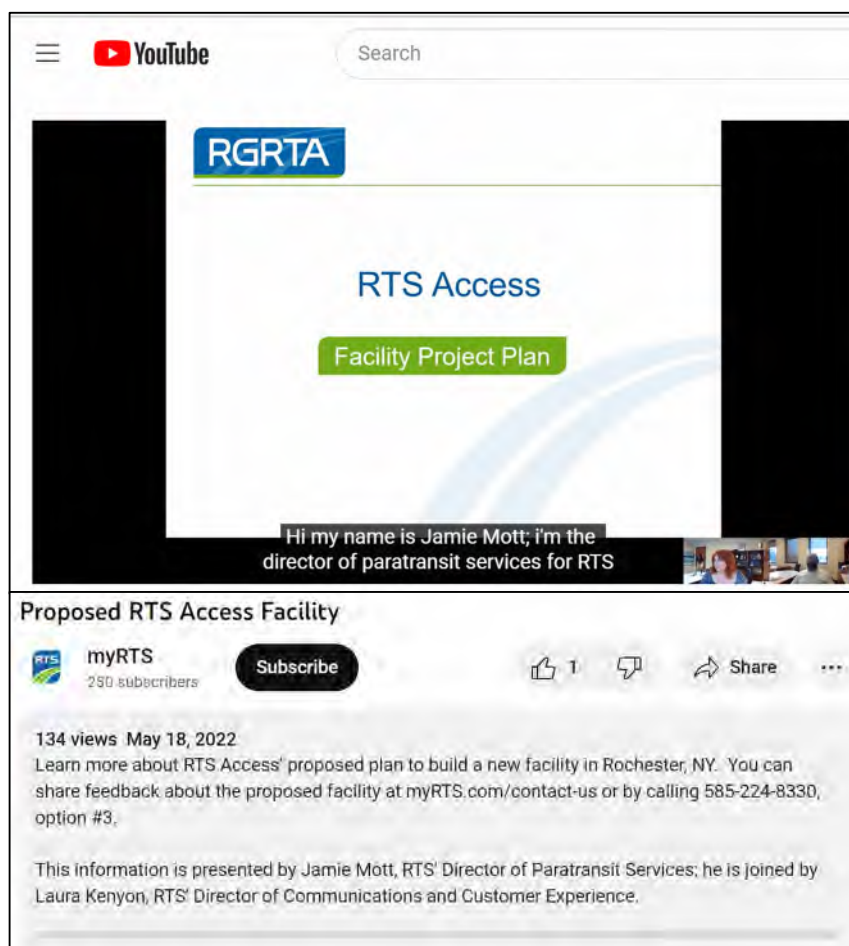


Figure 10—Screenshot of Recorded Presentation Explaining the Proposed RTS Access Facility and 1500 Lexington Site Location and Soliciting Comment, Prepared May 18, 2022, and posted on YouTube and [www.myrts.com](http://www.myrts.com)

After performing the second equity analysis to evaluate the effect on residents of Census Tract 88.01, we began planning a second comprehensive community outreach plan specifically to reach those residents. Efforts began in February and a full plan of activities is available as an addendum to this report (“Activity Tracker”). We made telephone calls and emails to connect with Edison Tech’s Principal Jacob Scott and initiated a collaborative relationship. Edison Tech permitted RTS Access to use their library to conduct a Public Information Session on April 19, 2023, at 6:00 PM. The location is close to the residents of Census Tract 88.01. On March 29, 2023, a direct mailing went to the 250 residents in Census Tract 88.01 to include them in the planning process of the RTS Access facility and solicit their input about using 1500-1600 Lexington Avenue as the location. The letter invited residents to the April 19 Public Information Session and described how residents could submit comments during the comment period of April 10 to May 12.

The event was advertised through social media, a notice in the Democrat and Chronicle, on the RTS website, flyers onboard buses, and through Edison Tech’s communication channels. Residents who could attend the event had the option to view a pre-recorded presentation on the RTS website and submit comments through the Contact Us online form or by calling RTS Customer Service.

A summary and timeline of activities follows.

## RTS ACCESS FACILITY SITE LOCATION REPORT

	Outreach Activity	Status	Due Date	Notes
1	Meeting between RGRTA CEO and Edison Tech High School contact	Done	02/15/2023	Principal Jacob Scott is collaborating in outreach.
2	Schedule date for Public Information Meeting	Done	02/20/2023	The session will occur on 04/19/2023 at the Edison Tech Library at 6:00 PM, The school is ADA accessible and near residents of Census Tract 88.01.
3	Determine comment period	Done	02/20/2023	The period will run from 04/10/2023 to 05/12/2023.
4	Updated communication with contacts for Ontario Bus	Done	03/02/2023	Phone calls and emails from General Counsel have gone to the General Manager at Ontario Bus, Inc. No reply as of yet.
5	Confirm the mail house can do a mass mailing to residents of Census Tract 88.01	Done	01/26/2023	Mailing house vendor will mail the letters to 250 residents at the addresses in Census Tract 88.01.
6	Update presentation for new audience	Done	03/24/2023	New material is drafted as of 03/02/2023.
7	Produce video of presentation and post on www.myrts.com	Done	03/27/2023	
8	Write letter for residents of Census Tract 88.01	Done	03/24/2023	Letter drafted as of 03/06/2023 and includes translated instructions on how to get language assistance in Spanish for U.S., Simplified Chinese, Vietnamese, and Tagalog.
9	Mass mailing to residents of Census Tract 88.01	Done	04/03/23	Mailed on 03/29/23.
10	<ul style="list-style-type: none"> <li>• Solicit comments.</li> <li>• Advertise public information meeting(s)</li> <li>• Send info to relevant lawmakers</li> </ul>	In progress	04/07/23 – 04/19/23	Request for comments posted on the website as of 03/27/23. Newspaper ad requesting comments ran in 04/16/23 issue of newspaper.
11	Hold public information meeting	Assigned	04/19/2023	Meeting is scheduled to occur at 6:00 PM at Edison Tech high school.
12	Collect comments; evaluate and respond	Assigned	04/10/2023 – 05/12/2023	

Conceptual design diagrams and renderings of what the facility could look like (LaBella, 2021, 2022) will be used in the recorded presentation and the presentation during the Public Information Session to help give residents a point of reference and stimulate dialogue. A transcriptionist will be present at the Public Information Session to capture the comments in writing. A Spanish-speaking RTS staff member and ASL interpreter will be present at the Public Information Session.

### 5.0. Site Determination

We do not have a site determination for the RTS Access facility. In compliance with Title 49 CFR Section 21.9(b)(3), RGRTA will proceed with the following activities during the 2023-2026 program period:

- Evaluate community input from the residential community in Census Tract 88.01;

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## RTS ACCESS FACILITY SITE LOCATION REPORT

- Engage in broader outreach with other stakeholders, RTS Access customers, and disability service providers and organizations;
- Understand what the adverse impacts, if any, exist from the location;
- Identify whether there are mitigations that would reduce or eliminate adverse impacts;
- Identify and analyze viable site location alternatives to determine whether those alternatives would have less of a disparate impact;
- Evaluate whether there is a substantial legitimate justification for locating the project at 1500-1600 Lexington Avenue.

# RTS ZERO-EMISSION DEPOT SITE LOCATION REPORT

## 1.0. RTS Zero-Emission Depot Project Description

GTC Nine-County Planning Region &  
Rochester Metropolitan Planning Area



Service	Current Facility Location	Facility Problems	Proposed Solutions
Fixed Route RTS Connect	<ul style="list-style-type: none"> <li>1372 East Main St., Rochester NY 14609</li> <li>On approximately ±19.3-acres</li> </ul>	Garage infrastructure cannot support 100% zero-emission bus fleet	Build a zero-emission depot onsite

- **Service:** RTS Connect | Fixed route
- **Current Facility Location:** 1372 East Main Street, Rochester NY 14609 in the urban core of Rochester in Monroe County. The RGRTA campus is surrounded by residential neighborhoods. The campus facilities are used to store, maintain, and fuel the fleet. The campus includes employee parking, bus parking and staging, bus garages, a maintenance facility, a service building for washing, cleaning, and fueling the buses, dispatch, break rooms, a wellness center, and administrative offices. The RTS Connect fleet has 198 vehicles including 20 electric battery buses. The vehicles consist of 40-foot buses and 60-foot articulated buses from manufacturers such as New Flyer, Nova, and Gillig. The RTS On Demand fleet has 26 small vehicles. We store and maintain both fleets at the RTS facility. RTS Bus Operators (other than those who are in-field reliefs) and Small Vehicle Operators report to the campus to receive their vehicle assignments. Vehicles travel from the campus to the RTS Transit Center or other start of the line locations for AM/PM pull-outs or to a designated start location in an On Demand Zone. At the end of the service day, all revenue vehicles return to the campus for cleaning, maintenance, storage, and preparation for the next service day.
- **Problems:** RTS is working toward a goal of a 25% zero-emission bus fleet by 2025 and 100% by 2035. RTS installed charging infrastructure into existing garages to support the 20 electric buses currently in its fleet. The infrastructure is “maxed out” in terms of charging capacity. RTS will need an additional facility to support a fleet that is entirely zero-emission. A new Zero-Emission Depot facility would store and fuel or charge zero-emission vehicles (hydrogen fuel-cell and electric battery).

## RTS ZERO-EMISSION DEPOT SITE LOCATION REPORT

Above Average Minority Population in the City of Rochester

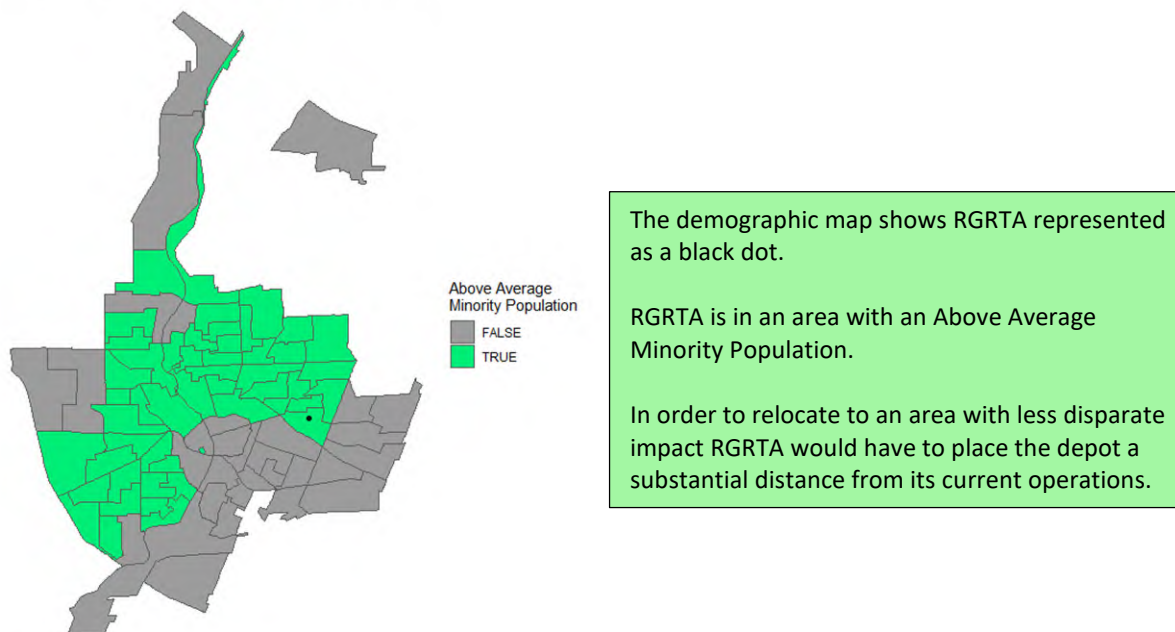


Figure 11—Demographic map showing RGRTA in the City of Rochester

### 2.0. Site Identification

In January 2020, the Governor of New York State called for the electrification of transit systems, requiring the five largest upstate and suburban transit agencies to electrify 25% of their fleets by 2025 and 100% by 2035. The transition to zero-emission technologies, where feasible, is essential to meeting New York State's climate targets, such as those laid out in the Climate Leadership and Community Protection Act (CLCPA). Full implementation of the Act will decarbonize the transportation sector and reduce overall statewide emissions 85% by 2050.

The New York Power Authority (NYPA) ordered the creation of Transit Bus Electrification Master Plans ("Master Plans") for the five largest upstate and suburban transit agencies.

In late 2021, Master Transit Plans were developed for Suffolk County, Westchester County, Capital District Transportation Authority, Rochester-Genesee Regional Transportation Authority (RGRTA), and Niagara Frontier Transportation Authority.

The RGRTA Master Plan was developed by a consultant team on behalf of NYPA, New York State Energy Research and Development Authority (NYSERDA), and the New York Department of Transportation (NYSDOT). The consultant team consisted of Energy and Environmental Economics, Black & Veatch, STV Inc., SCurve Strategies, and CalStart. The consultant team analyzed the 1372 East Main Street site to develop preliminary designs and cost estimates for the zero-emission vehicle depot.

The study estimated the capital investment at \$293.6 million and operating costs at reaching \$1.86 million/year by 2035. The costs and logistics are the primary reasons for focusing the site location at 1372 East Main Street, where significant infrastructure already exists. At the time of this submission, no other site locations have been evaluated. Funding is an ongoing concern in the progression of the zero-emission initiative.



## RTS ZERO-EMISSION DEPOT SITE LOCATION REPORT

From 2020 to the present, RGRTA has been using a small number of electric battery buses in its fleet. The usage has given RGRTA valuable experience with the technology and a clear understanding of its benefits and limitations. RGRTA is subsequently piloting and evaluating a hydrogen fuel cell bus.

The Zero-Emission Depot could be built adjoining the existing Garage C. Following the alphabetical naming convention for the garages, it would be referred to as “Garage D.” The garage will require 68,393 square feet to allow up to 80 buses to be stored inside.



Figure 12—Aerial photograph of the RGRTA Headquarters at 1372 East Main Street, Rochester NY with the three existing garages labeled and the proposed location for the new zero-emission depot (“Garage D”)



Figure 13—Aerial photograph of the RTS Operations Building and garages, showing the locations of the existing garages and the proposed location for the zero-emission depot (“Garage D”)

Title VI Program Plan June 2023-2026, Version 6



## RTS ZERO-EMISSION DEPOT SITE LOCATION REPORT

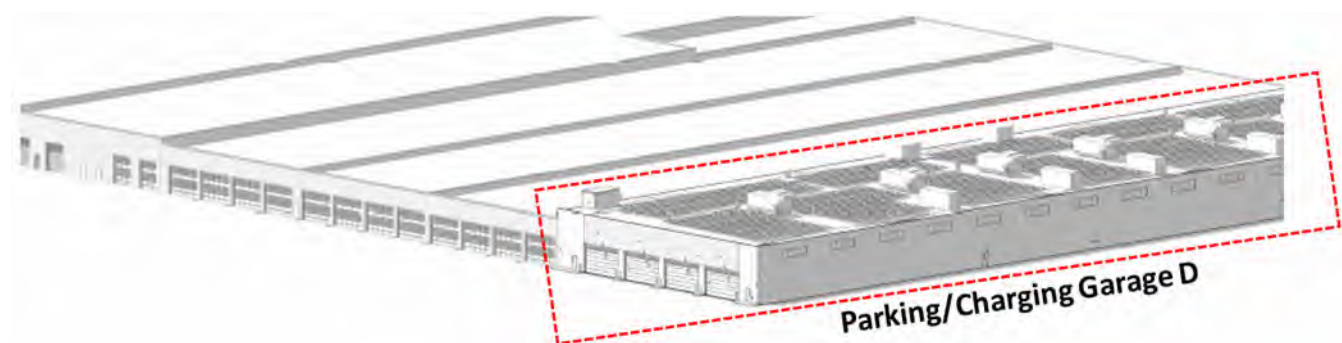


Figure 14—A conceptual rendering of Garage D integrated with the existing garages

The RGRTA campus is surrounded by residential neighborhoods. Other nearby businesses are small corner shops, food chains, restaurants, retailers, a bottle recycling location, a driving school, and East High School (about 2 miles east). Adding the Zero-Emission Depot to the RGRTA campus would create cumulative impact to the degree that there are already garages, buses, and maintenance facilities on the site. Simultaneously, a growing zero-emission fleet would decrease CO<sub>2</sub> emissions at the location and around the urban core of the city over time, resulting in a cumulative benefit.

The residential streets nearest the existing Garages A-C and, potentially, Garage D would include Federal Street, Cedarwood Terrace, and Fraser Street.

### 3.0. Equity Analysis

In October 2022, we performed an equity analysis on the census tracts surrounding the RGRTA campus, Census Tracts 57 and 59.

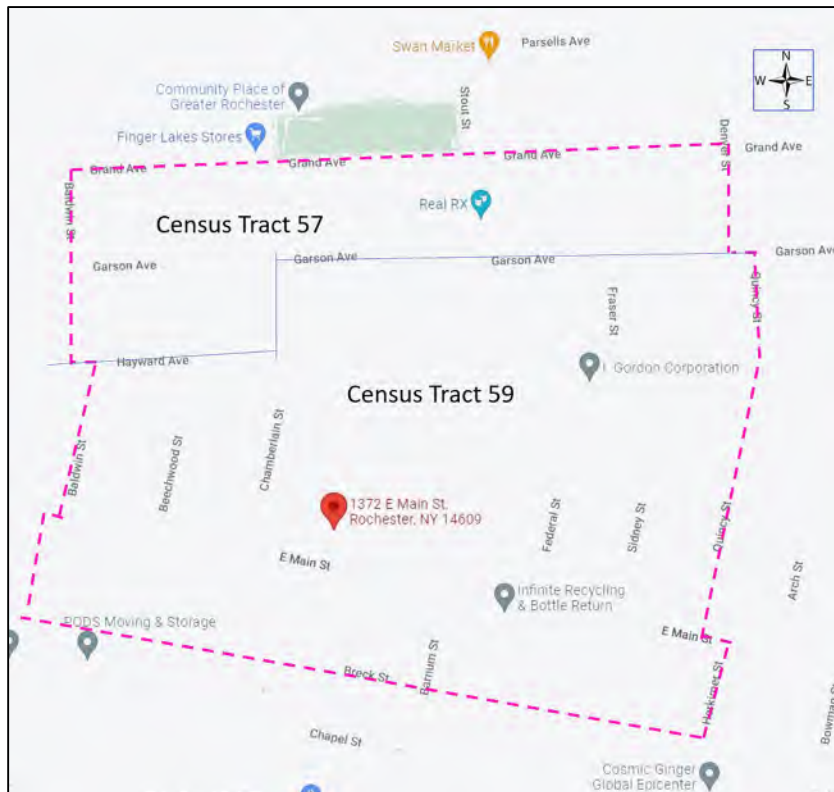


Figure 15—Census Tracts 57 and 59 with residences on East Main, Chamberlain, Hayward, Baldwin, Beechwood, Breck, Cedarwood, Denver, Federal, Fraser, Garson, Grand, Herkimer, Mustard, Palmer, Quincy, Sidney, and Stout

Title VI Program Plan June 2023-2026, Version 6

## RTS ZERO-EMISSION DEPOT SITE LOCATION REPORT

All addresses showed Disparate Impact according to the RGRTA equity thresholds and compared against Monroe County data. Most addresses showed Disproportionate Burden (37 out of 52) according to the RGRTA equity thresholds. All addresses have higher percentages under the poverty line when compared against Monroe County data.

	Monroe County	1372-1398 East Main Street	1404 East Main Street	1408 East Main Street	1414 East Main Street	1420 East Main Street	1424 East Main Street	1426 East Main Street	1430-1436 East Main Street
Is this RGRTA property?		yes	yes	yes	yes	yes	yes	yes	yes
Census Tract		Tract 59	Tract 59	Tract 59	Tract 59	Tract 59	Tract 59	Tract 59	Tract 59
Total population	744,248	1625	1625	1625	1625	1625	1625	1625	1625
White	560,874	248	248	248	248	248	248	248	248
Non-white	183,374	1377	1377	1377	1377	1377	1377	1377	1377
Non-White %	24.60%	85%	85%	85%	85%	85%	85%	85%	85%
Population under Poverty Line	105,226	538	538	538	538	538	538	538	538
Percentage under Poverty Line	14.60%	33%	33%	33%	33%	33%	33%	33%	33%
Median Income (Households)	\$57,479	\$30,380.00	\$30,380.00	\$30,380.00	\$30,380.00	\$30,380.00	\$30,380.00	\$30,380.00	\$30,380.00
Limited English Proficient population percent?	4.00%	9.10%	9.10%	9.10%	9.10%	9.10%	9.10%	9.10%	9.10%
Disparate Impact greater than +/- 20 percent?		Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Disproportionate Burden greater than +/- 20 percent?		Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

Figure 16—Equity Analysis Table 1 of 8

	Monroe County	1372-1398 East Main Street	1442-1444 East Main Street	1446-1448 East Main Street	1454-1460 East Main Street	1466 East Main Street	1470 East Main Street	1476 East Main Street	36-38 Chamberlain Street
Is this RGRTA property?		yes	yes	yes	yes	yes	yes	yes	yes
Census Tract		Tract 59	Tract 59	Tract 59	Tract 59	Tract 59	Tract 59	Tract 59	Tract 59
Total population	744,248	1625	1625	1625	1625	1625	1625	1625	1625
White	560,874	248	248	248	248	248	248	248	248
Non-white	183,374	1377	1377	1377	1377	1377	1377	1377	1377
Non-White %	24.60%	85%	85%	85%	85%	85%	85%	85%	85%
Population under Poverty Line	105,226	538	538	538	538	538	538	538	538
Percentage under Poverty Line	14.60%	33%	33%	33%	33%	33%	33%	33%	33%
Median Income (Households)	\$57,479	\$30,380.00	\$30,380.00	\$30,380.00	\$30,380.00	\$30,380.00	\$30,380.00	\$30,380.00	\$30,380.00
Limited English Proficient population percent?	4.00%	9.10%	9.10%	9.10%	9.10%	9.10%	9.10%	9.10%	9.10%
Disparate Impact greater than +/- 20 percent?		Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Disproportionate Burden greater than +/- 20 percent?		Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

Figure 17—Equity Analysis Table 2 of 8



## RTS ZERO-EMISSION DEPOT SITE LOCATION REPORT

	Monroe County	1372-1398 East Main Street	42 Chamberlain Street	46 Chamberlain Street	58 Chamberlain Street	60 Chamberlain Street	62 Chamberlain Street	66-68 Chamberlain Street
Is this RGRTA property?		yes	yes	yes	yes	yes	yes	yes
Census Tract		Tract 59	Tract 59	Tract 59	Tract 59	Tract 59	Tract 59	Tract 59
Total population	744,248	1625	1625	1625	1625	1625	1625	1625
White	560,874	248	248	248	248	248	248	248
Non-white	183,374	1377	1377	1377	1377	1377	1377	1377
Non-White %	24.60%	85%	85%	85%	85%	85%	85%	85%
Population under Poverty Line	105,226	538	538	538	538	538	538	538
Percentage under Poverty Line	14.60%	33%	33%	33%	33%	33%	33%	33%
Median Income (Households)	\$57,479	\$30,380.00	\$30,380.00	\$30,380.00	\$30,380.00	\$30,380.00	\$30,380.00	\$30,380.00
Limited English Proficient population percent?	4.00%	9.10%	9.10%	9.10%	9.10%	9.10%	9.10%	9.10%
Disparate Impact greater than +/- 20 percent?		Yes	Yes	Yes	Yes	Yes	Yes	Yes
Disproportionate Burden greater than +/- 20 percent?		Yes	Yes	Yes	Yes	Yes	Yes	Yes

Figure 18—Equity Analysis Table 3 of 8

	Monroe County	1372-1398 East Main Street	104-106 Chamberlain Street	580-582 Hayward Avenue	586 Hayward Avenue	587-589 Hayward Avenue	592 Hayward Avenue	591-593 Hayward Avenue	596 Hayward Avenue
Is this RGRTA property?		yes	yes	yes	yes	yes	yes	yes	yes
Census Tract		Tract 59	Tract 59	Tract 57	Tract 57	Tract 59	Tract 57	Tract 59	Tract 57
Total population	744,248	1625	1625	1920	1920	1625	1920	1625	1920
White	560,874	248	248	235	235	248	235	248	235
Non-white	183,374	1377	1377	1685	1685	1377	1685	1377	1685
Non-White %	24.60%	85%	85%	88%	88%	85%	88%	85%	88%
Population under Poverty	105,226	538	538	429	429	538	429	538	429
Percentage under Poverty Line	14.60%	33%	33%	22%	22%	33%	22%	33%	22%
Median Income (Households)	\$57,479	\$30,380.00	\$30,380.00	\$43,616.00	\$43,616.00	\$30,380.00	\$43,616.00	\$30,380.00	\$43,616.00
Limited English Proficient population percent?	4.00%	9.10%	9.10%	3.60%	3.60%	9.10%	3.60%	9.10%	3.60%
Disparate Impact greater than +/- 20 percent?		Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Disproportionate Burden greater than +/- 20 percent?		Yes	Yes	No*	No*	Yes	No*	Yes	No*

Figure 19—Equity Analysis Table 4 of 8

\*The location did not trigger Disproportionate Burden under the policy threshold but has a higher percentage compared to the County average

	Monroe County	1372-1398 East Main Street	597 Hayward Avenue	601 Hayward Avenue	602 Hayward Avenue	603-605 Hayward Avenue	608 Hayward Avenue	614 Hayward Avenue	618 Hayward Avenue
Is this RGRTA property?		yes	yes	yes	yes	yes	yes	yes	yes
Census Tract		Tract 59	Tract 59	Tract 59	Tract 57	Tract 59	Tract 57	Tract 57	Tract 57
Total population	744,248	1625	1625	1625	1920	1625	1920	1920	1920
White	560,874	248	248	248	235	248	235	235	235
Non-white	183,374	1377	1377	1377	1685	1377	1685	1685	1685
Non-White %	24.60%	85%	85%	85%	88%	85%	88%	88%	88%
Population under Poverty Line	105,226	538	538	538	429	538	429	429	429
Percentage under Poverty Line	14.60%	33%	33%	33%	22%	33%	22%	22%	22%
Median Income (Households)	\$57,479	\$30,380.00	\$30,380.00	\$30,380.00	\$43,616.00	\$30,380.00	\$43,616.00	\$43,616.00	\$43,616.00
Limited English Proficient population percent?	4.00%	9.10%	9.10%	9.10%	3.60%	9.10%	3.60%	3.60%	3.60%
Disparate Impact greater than +/- 20 percent?		Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Disproportionate Burden greater than +/- 20 percent?		Yes	Yes	Yes	No*	Yes	No*	No*	No*

Figure 20—Equity Analysis Table 5 of 8

\*The location did not trigger Disproportionate Burden under the policy threshold but has a higher percentage compared to the County average



## RTS ZERO-EMISSION DEPOT SITE LOCATION REPORT

	Monroe County	1372-1398 East Main Street	630 Hayward Avenue	Baldwin Street	Beechwood Street	Breck Street	Cedarwood Terrace	Chamberlain Street	Denver Street
Is this RGRTA property?		yes	yes						
Census Tract		Tract 59	Tract 57	Tract 57	Tract 59	Tract 59	Tract 59	Tract 59	Tract 57
Total population	744,248	1625	1920	1920	1625	1625	1625	1625	1920
White	560,874	248	235	235	248	248	248	248	235
Non-white	183,374	1377	1685	1685	1377	1377	1377	1377	1685
Non-White %	24.60%	85%	88%	88%	85%	85%	85%	85%	88%
Population under Poverty Line	105,226	538	429	429	538	538	538	538	429
Percentage under Poverty Line	14.60%	33%	22%	22%	33%	33%	33%	33%	22%
Median Income (Households)	\$57,479	\$30,380.00	\$43,616.00	\$43,616.00	\$30,380.00	\$30,380.00	\$30,380.00	\$30,380.00	\$43,616.00
Limited English Proficient population percent?	4.00%	9.10%	3.60%	3.60%	9.10%	9.10%	9.10%	9.10%	3.60%
Disparate Impact greater than +/- 20 percent?		Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Disproportionate Burden greater than +/- 20 percent?		Yes	No*	No*	Yes	Yes	Yes	Yes	No*

Figure 21—Equity Analysis Table 6 of 8; Cedarwood Terrace is near the existing garages

\*The location did not trigger Disproportionate Burden under the policy threshold but has a higher percentage compared to the County average

	Monroe County	1372-1398 East Main Street	Federal Street	Fraser Street	Garson Avenue	Grand Avenue	Hayward Avenue	Herkimer Street	Mustard Street
Is this RGRTA property?		yes							
Census Tract		Tract 59	Tract 59	Tract 59	Tract 57	Tract 57	Tract 57	Tract 59	Tract 59
Total population	744,248	1625	1625	1625	1920	1920	1920	1625	1625
White	560,874	248	248	248	235	235	235	248	248
Non-white	183,374	1377	1377	1377	1685	1685	1685	1377	1377
Non-White %	24.60%	85%	85%	85%	88%	88%	88%	85%	85%
Population under Poverty Line	105,226	538	538	538	429	429	429	538	538
Percentage under Poverty Line	14.60%	33%	33%	33%	22%	22%	22%	33%	33%
Median Income (Households)	\$57,479	\$30,380.00	\$30,380.00	\$30,380.00	\$43,616.00	\$43,616.00	\$43,616.00	\$30,380.00	\$30,380.00
Limited English Proficient population percent?	4.00%	9.10%	9.10%	9.10%	3.60%	3.60%	3.60%	9.10%	9.10%
Disparate Impact greater than +/- 20 percent?		Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Disproportionate Burden greater than +/- 20 percent?		Yes	Yes	Yes	No*	No*	No*	Yes	Yes

Figure 22—Equity Analysis Table 7 of 8

\*The location did not trigger Disproportionate Burden under the policy threshold but has a higher percentage compared to the County average

	Monroe County	1372-1398 East Main Street	Palmer Street	Quincy Street	Sidney Street	Stout Street
Is this RGRTA property?		yes				
Census Tract		Tract 59	Tract 59	Tract 59	Tract 59	Tract 57
Total population	744,248	1625	1625	1625	1625	1920
White	560,874	248	248	248	248	235
Non-white	183,374	1377	1377	1377	1377	1685
Non-White %	24.60%	85%	85%	85%	85%	88%
Population under Poverty Line	105,226	538	538	538	538	429
Percentage under Poverty Line	14.60%	33%	33%	33%	33%	22%
Median Income (Households)	\$57,479	\$30,380.00	\$30,380.00	\$30,380.00	\$30,380.00	\$43,616.00
Limited English Proficient population percent?	4.00%	9.10%	9.10%	9.10%	9.10%	3.60%
Disparate Impact greater than +/- 20 percent?		Yes	Yes	Yes	Yes	Yes
Disproportionate Burden greater than +/- 20 percent?		Yes	Yes	Yes	Yes	No*

Figure 23—Equity Analysis Table 9 of 8

\*The location did not trigger Disproportionate Burden under the policy threshold but has a higher percentage compared to the County average

## RTS ZERO-EMISSION DEPOT SITE LOCATION REPORT

The presence of significant Disparate Impact and Disproportionate Burden indicates that using the existing campus at 1372 East Main Street would require a substantial legitimate justification for locating the project there, and evidence that there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin.

### 4.0. Community Outreach

The Transit Master Plan identified the following key local and state-wide stakeholders to engage in planning zero-emission transit fleets.

- |  |  |
|--|--|
| 1. Genesee Transportation Council        | 16. Gillig                                     |
| 2. Greater Rochester Chamber of Commerce | 17. Greenlots                                  |
| 3. Greater Rochester Clean Cities        | 18. Jobs to Move America                       |
| 4. Reconnect Rochester                   | 19. National Federation of the Blind New York  |
| 5. Rochester Gas & Electric              | 20. Natural Resources Defense Council (NRDC)   |
| 6. Rochester Institute of Technology     | 21. New Flyer                                  |
| 7. Small Business Council of Rochester   | 22. New York State Association of Counties     |
| 8. University of Rochester               | 23. New York League of Conservation Voters     |
| 9. American Public Transit Association   | 24. New York Public Transit Association        |
| 10. Business Council of New York State   | 25. New York State Public Employees Federation |
| 11. BYD Motors                           | 26. Nova Bus                                   |
| 12. ChargePoint                          | 27. NY Renews                                  |
| 13. EarthJustice                         | 28. Proterra                                   |
| 14. Environmental Advocates of New York  | 29. Tri-State Transportation Campaign          |
| 15. EV Connect                           |  |

In compliance with Title VI, if RGRTA has substantial legitimate justification for locating the Garage D facility onsite at the 1372 East Main Street campus and cannot identify alternative appropriate site locations with less Disparate Impact, the community engagement must also include the community members of the residential areas analyzed in Census Tract 57 and 59.

RGRTA is currently holding discussions with members of the Beechwood Neighborhood Coalition Board. The Coalition is a volunteer neighborhood group working to enhance the Beechwood neighborhood. The Beechwood neighborhood encompasses the residential areas in Census Tracts 57 and 59.

Outreach with the Beechwood Neighborhood Coalition should, at a minimum, involve educational workshops and public information sessions. Meetings should be advertised through direct mailing to residents, contact with Beechwood Board members, public notices onboard buses, notices in the newspaper and social media. There should be ongoing opportunities for comment and input into the planning process.

### 5.0. Site Determination

By transitioning to a fully zero-emission bus fleet, RTS will save about 12,400 metric tons (“tonnes”) of CO<sub>2</sub> emissions each year. At the time of this submission, RGRTA does not have alternate sites identified with less or no disparate impact. Using a site location located any significant distance from 1372 East Main Street will prevent RGRTA from maximizing its existing infrastructure, and from retaining any service and cost

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## RTS ZERO-EMISSION DEPOT SITE LOCATION REPORT

efficiencies gained by keeping maintenance employees, dispatchers, Bus Operators, and management in close proximity.

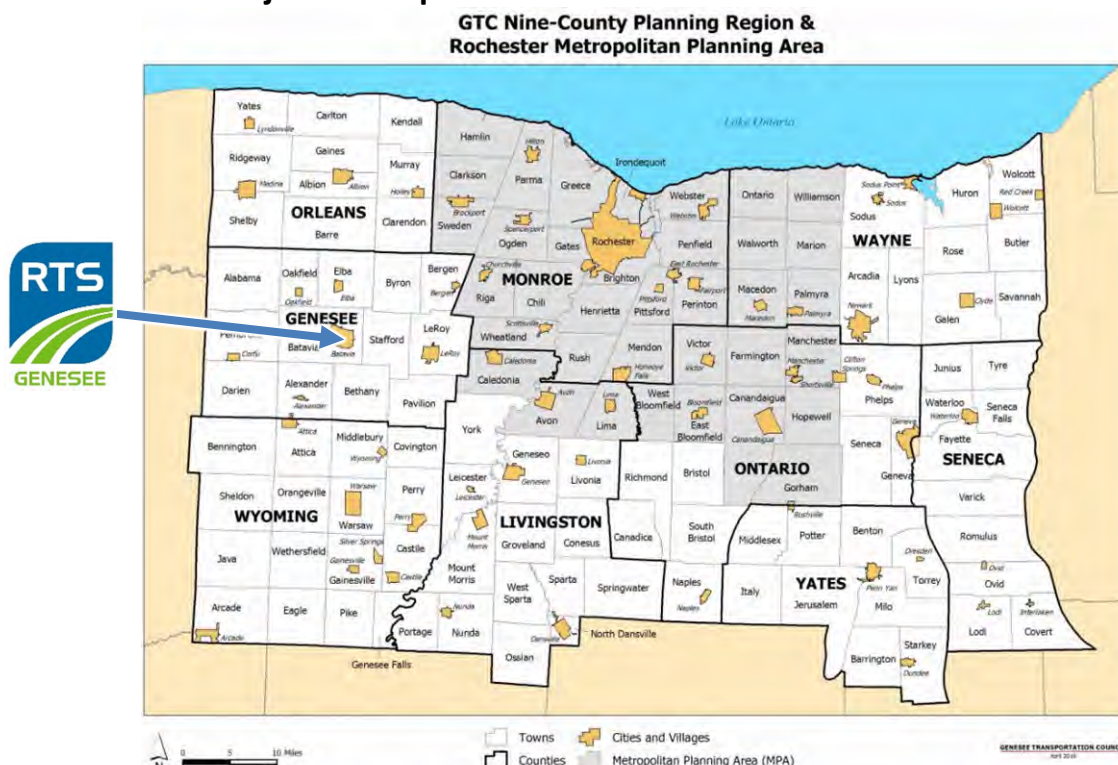
In compliance with Title 49 CFR Section 21.9(b)(3), RGRTA will proceed with the following activities during the 2023-2026 program period:

- Continue to build on the relationship with the Beechwood Neighborhood Coalition to engage residents in the planning process;
- Evaluate input from the Beechwood Neighborhood residents, especially those in Census Tracts 57 and 59;
- Understand what the adverse impacts, if any, exist from the location;
- Identify whether there are mitigations that would reduce or eliminate adverse impacts;
- Identify and analyze viable site location alternatives to determine whether those alternatives would have less of a disparate impact;
- Evaluate whether there is a substantial legitimate justification for locating the project at 1372 East Main Street, Rochester NY 14609.



# RTS GENESEE FACILITY SITE LOCATION REPORT

## 1.0. RTS Genesee Project Description



Service	Current Facility Location	Facility Problems	Proposed Solutions
Route Deviation Dial-A-Ride Genesee County	153 Cedar Street in the Town of Batavia County Highway Department facility	Inadequate open-sided "bus barn" that does not fit the entire fleet. Unpaved gravel area Located in a flood zone	Build a new facility to completely shelter the entire RTS Genesee fleet. The new facility would be 14,000 square feet and require 2.5 acres of land.

- **Service:** RTS Genesee | Route Deviation and Dial-Ride
- **Current Facility Location:** RTS Genesee currently operates under a lease agreement on an adjacent site owned by Genesee County, which is shared with the County Highway Department and the County Department of Weights and Measures. RTS Genesee administrative employees (management, transportation specialists) use a shared office in the County Highway Department facility located on 153 Cedar Street in the Town of Batavia. RGRTA has a contract with Genesee County to maintain and fuel the RTS Genesee bus fleet of 12 buses (25-foot, 26-foot, 32-foot).
- **Problems:** A separate building on the property acts as a storage area for the RTS Genesee buses ("bus barn"). The bus barn is open-sided and cannot fit the entire fleet. It lacks a fire suppression system/fire alarm system. Bus Operators must enter the County Building to obtain their work assignments, exit the building, and then walk outside to a bus in the parking lot, or continue from the parking lot onto an unpaved area to the bus barn. The buses stored outside require additional time to clear snow/ice during winter months. The unpaved area and bus barn are in a flood zone.

## RTS GENESEE FACILITY SITE LOCATION REPORT



RTS Seneca operates from the Genesee County Highway Department facility at 153 Cedar Street.

The administrative staff uses a small space inside the building.

The bus fleet are partially stored in a “barn” located on an unpaved area (gravel) on the property.

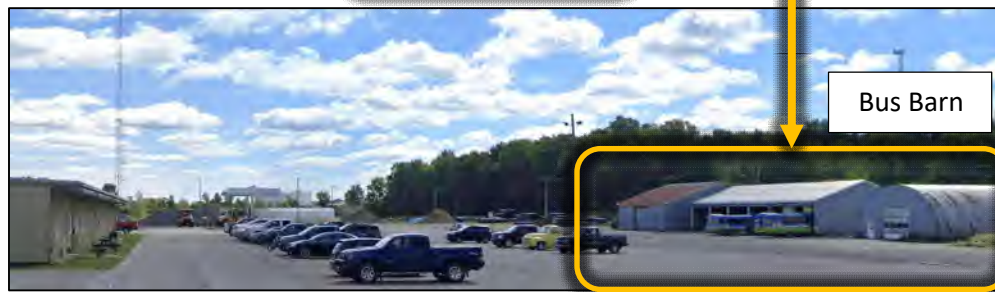


Figure 24—RTS Genesee facility at 153 Cedar Street

### 2.0. Site Identification

RGRTA proposed that a new RTS Genesee facility would require approximately 2.5 acres of land to support a 14,000 square foot building. The new facility would include administrative office space, bus storage and a vehicle wash area. The new facility would not include maintenance or fueling infrastructure. The proximity of the new facility would consider the need to continue using the Genesee County’s services and facilities for bus fueling and maintenance. RGRTA worked with the Genesee County Industrial Development agency to identify available sites that were at least 2.5 acres. After applying the Site Selection Criteria, we identified six potential site locations. We reviewed the sites for cumulative impacts that might adversely affect the communities. There would be no displacement of residents at the six locations considered for site selection.

Site A—Cedar St, Batavia, NY 14020 Census Tract 9510 (street address is unknown, it is near 153 Cedar St.)

Site B—W. Saile Rd & Call Parkway Batavia, NY 14020 Census Tract 9504.01

Site C—4868 East Saile Drive Batavia, NY 14020 Census Tract 9504.01

Site D—5158 E Main St Road Batavia NY 14020 Census Tract 9504.02

Site E—Elicott St Road Batavia NY 14020 Census Tract 9504.02

Site F—Ag Park Dr W Batavia NY 14020 Census Tract 9504.02

**Site A— Cedar St, Batavia, NY 14020 Census Tract 9510 (street address is unknown, it is near 153 Cedar St)**

Who is impacted by selecting this site?

There are no residences nearby, but the location is close to the Genesee County Highway Department. The closest business is O-AT-KA Milk Products, LLC. The site very close to an industrial area. Residential and business areas become denser to the northwest, about 1.25 miles away.

Title VI Program Plan June 2023-2026, Version 6

## RTS GENESEE FACILITY SITE LOCATION REPORT

<b>Site A— Cedar St, Batavia, NY 14020 Census Tract 9510 (street address is unknown, it is near 153 Cedar St)</b>	
Will selecting this site displace residents or businesses?	No
List other similar facilities nearby (maintenance, storage, and operations)	<ul style="list-style-type: none"> <li>• Genesee County Highway Department</li> <li>• Genesee County Fairgrounds</li> <li>• Genesee County Speedway</li> </ul>
<b>Site B—W. Saile Rd &amp; Call Parkway Batavia, NY 14020 Census Tract 9504.01</b>	
Who is impacted by selecting this site?	Possibly the NYS Police
Will selecting this site displace residents or businesses?	No
List other similar facilities nearby (maintenance, storage, and operations)	<ul style="list-style-type: none"> <li>• New York State Police - Troop A Headquarters</li> <li>• Monroe Tractor Batavia</li> <li>• Parmenter Tire, Auto, &amp; Truck Service</li> <li>• Landpro Equipment (tractor dealer)</li> <li>• W. Saile Drive Self Storage</li> <li>• SCP Distributors LLC (pool supply and equipment distributors)</li> </ul>
<b>Site C—4868 East Saile Drive Batavia, NY 14020 Census Tract 9504.01</b>	
Who is impacted by selecting this site?	No apparent parties are impacted.
Will selecting this site displace residents or businesses?	No
List other similar facilities nearby (maintenance, storage, and operations)	There are no facilities nearby related to transit/vehicle maintenance, storage, or operations.
<b>Site D—Elicott St Road Batavia NY 14020 Census Tract 9504.02</b>	
Who is impacted by selecting this site?	No apparent parties are impacted.
Will selecting this site displace residents or businesses?	No
List other similar facilities nearby (maintenance, storage, and operations)	<ul style="list-style-type: none"> <li>• Genesee County Airport</li> <li>• Diesel Works, Inc.</li> <li>• Ditch Witch Mid-States Service Center</li> <li>• L&amp;M Specialty Fabrication</li> <li>• Roofing contractor</li> </ul>
<b>Site E—5158 E Main St Road Batavia NY 14020 Census Tract 9504.02</b>	
Who is impacted by selecting this site?	There is a residential area nearby.
Will selecting this site displace residents or businesses?	No
List other similar facilities nearby (maintenance, storage, and operations)	No other similar facilities.
<b>Site F—Ag Park Dr W Batavia NY 14020 Census Tract 9504.02</b>	
Who is impacted by selecting this site?	There are no apparent parties impacted.
Will selecting this site displace residents or businesses?	No
List other similar facilities nearby (maintenance, storage, and operations)	<ul style="list-style-type: none"> <li>• Genesee County Highway Department</li> <li>• Genesee County Fairgrounds</li> <li>• Genesee County Speedway</li> <li>• Upstate Farms Cultured Products</li> <li>• O-AT-KA Milk Products, LLC</li> </ul>



## RTS GENESEE FACILITY SITE LOCATION REPORT

**Site A—Existing location and new location located behind the Genesee County Highway Department Census Tract 9510**

**Site B—W. Saile Rd & Call Parkway  
Batavia, NY 14020 Census Tract 9504.01**

**Site C—4868 East Saile Drive Batavia,  
NY 14020 Census Tract 9504.01**

**Site D—Elicott St Road Batavia NY  
14020 Census Tract 9504.02**

**Site E—5158 E Main St Road Batavia  
NY 14020 Census Tract 9504.02**

**Site F—Ag Park Dr W Batavia NY  
14020 Census Tract 9504.02**



Figure 25—Potential Site Locations for the New RTS Genesee Facility

### 3.0. Equity Analysis

We conducted a Title VI equity analyses on January 24, 2023.

	Site A Cedar St. Tract 9510	Site B W. Saile Rd. Tract 9504.01	Site C E. Saile Dr. Tract 9504.01	Site D Elicott St. Rd. Tract 9504.02	Site E 5158 E. Main St. Tract 9504.02	Site F Ag Park Dr Tract 9504.02	Genesee County
<b>Total Population</b>	2558	2835	2835	3508	3508	3508	<b>58387</b>
<b>White</b>	2117	2785	2785	3498	3498	3498	<b>53271</b>
<b>Non-White</b>	411	50	50	10	10	10	<b>5116</b>
<b>Non-White %</b>	17.2%	1.8%	1.8%	0.3%	0.3%	0.3%	<b>8.8%</b>
<b>Population under Poverty Line</b>	716	283	283	161	161	161	<b>5977</b>
<b>Percentage under Poverty Line</b>	28.0%	10.0%	10.0%	4.6%	4.6%	4.6%	<b>10.4%</b>
<b>Median Income (Households)</b>	\$28,420	\$30,288	\$30,288	\$37,179	\$37,179	\$37,179	<b>\$33,386</b>
<b>LEP %</b>	1.2%	0.0%	0.0%	0.0%	0.0%	0.0%	<b>0.7%</b>
<b>Disparate Impact greater than +/- 20 percent?</b>	YES	NO	NO	NO	NO	NO	
<b>Disproportionate Burden greater than +/- 20 percent?</b>	YES	NO	NO	NO	NO	NO	

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## RTS GENESEE FACILITY SITE LOCATION REPORT

Cost per acre and the highest upfront cost eliminated Site E (5158 E. Main Street) from the list.

Site F Ag Park Dr W Batavia NY 14020 Census Tract 9504.02 was considered an ideal choice because it was near the County Highway Department at 153 Cedar Street, had no impact on traffic, and caused no disparate impact. However, the property was sold during RGRTA's evaluation and is no longer available as a potential site.

Site A is located directly behind the County Highway Department and would not add distance greater than what currently exists. Site A would not require fueling or maintenance infrastructure in the new facility or add travel time for fueling and maintenance at the County building.



Figure 26—Current site at 153 Cedar Street and proximity to Site A

Sites B, C, and D add distance that employees and fleet vehicles would need to travel between the County Highway Department for fueling and maintenance. Sites B and C would either add non-revenue service travel time for fueling and service or require the inclusion of maintenance and fueling infrastructure in the design, adding to the overall impact and cost of the project.

Potential Site	Distance from 153 Cedar Street Genesee County Highway Department
Site A: Cedar Street	No significant distance
Site B: W. Saile Rd & Call Parkway Batavia, NY 14020	4.5 miles, one-way
Site C: 4868 East Saile Drive Batavia, NY 14020	4.3 miles, one-way
Site D: Elicott St Road Batavia NY 14020	1 mile (approximately), one-way

## RTS GENESEE FACILITY SITE LOCATION REPORT

Site A (behind 153 Cedar Street) is an unusual location due to its close proximity to the border between Census Tract 9510 and 9504.02.

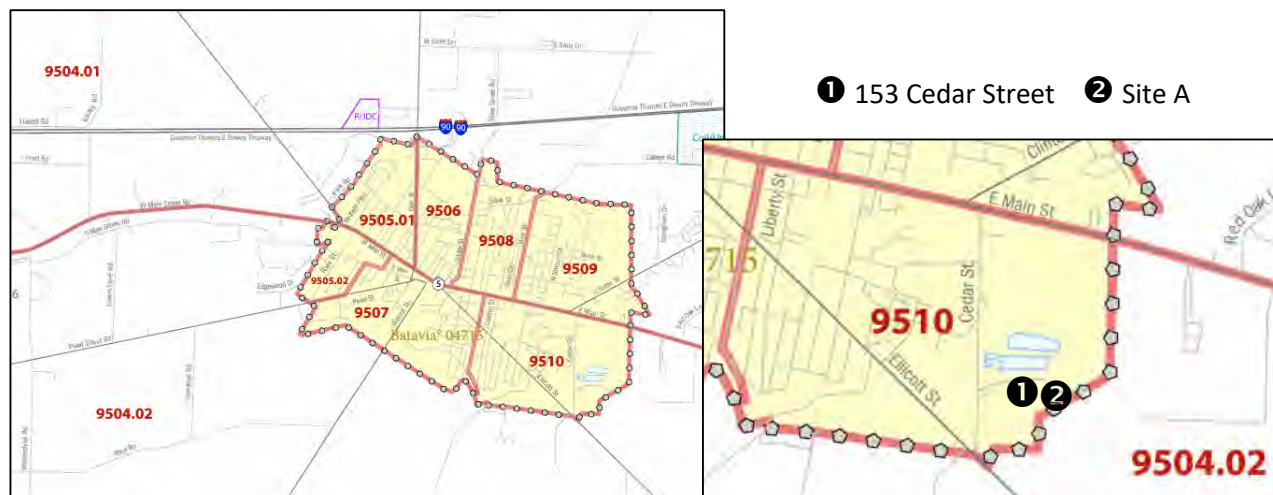


Figure 27—Portion of 2020 CENSUS - CENSUS TRACT REFERENCE MAP: Genesee County, NY showing the proximity of 153 Cedar Street and Site A to the boundary between Census Tract 9510 and 9504.02

The proximity of 153 Cedar Street and Site A to Census Tract 9504.02 is noteworthy because the locations do not appear to be near populated areas. The residential and business areas in Tract 9510 are approximately 1.25 miles west / northwest of the sites. Census Tract 9510 covers an area within the Town of Batavia that is more densely populated than the majority of the Census Tracts in the County, which may explain the significant difference in Non-White populations in 9510 compared to 9504.02.

### 4.0. Community Outreach

At present, we have not initiated community outreach efforts towards the populations in Census Tract 9510. A recommended action would be for RGRTA to form a Genesee Community Advisory body to engage in the planning process. Engaging the community in a dialogue about the proposed relocation of the bus barn, which could be situated approximately 1150 feet away from its current location and nearly on the boundary of Census Tract 9504.02, would be a constructive topic to pursue. Specifically, we intend to solicit feedback from the community about the adverse effects they anticipate experiencing because of this relocation and any concerns they may have. This engagement with the community would be an opportunity to gather valuable input and better understand the impact of the bus barn relocation on the local population.

### 5.0. Site Determination

RGRTA has not finalized a site location (acquired property). On September 22, 2022, the RGRTA Board of Commissioners authorized the award of a contract to a professional engineering and design service (LiRo Engineers) to complete a 30% design, specifications, and cost estimate in order to construct a new bus facility including office space for RTS Genesee. In compliance with Title 49 CFR Section 21.9(b)(3), RGRTA will proceed with the following activities during the 2023-2026 program period:

- Evaluate community input from the residential community and local officials in Census Tract 9510;
- Understand what the adverse impacts, if any, exist from the location;
- Identify whether there are mitigations that would reduce or eliminate adverse impacts;
- Analyze site location alternatives (Site D, Elicott Street Road) which have less disparate impact;
- Evaluate whether there is a substantial legitimate justification for locating the project at Site A near 153 Cedar Street.



# RTS SENECA FACILITY SITE LOCATION REPORT

## 1.0. RTS Seneca Project Description

GTC Nine-County Planning Region &  
Rochester Metropolitan Planning Area



Service	Current Facility Location	Facility Problems	Proposed Solutions
Route Deviation Dial-A-Ride Seneca County	1 DiPronio Drive Waterloo, NY 13165 in the Seneca County Office Building	<ul style="list-style-type: none"> <li>Shared office in the County Building.</li> <li>Buses stored outdoors (no shelter) in parking lot.</li> <li>Parking lot has standing water and ice seasonally.</li> <li>Insufficient bus washing equipment.</li> </ul>	Identify a new site to build a 13,600 square foot facility with sheltered bus storage, consolidated administrative office space, and bus washing area.

- **Service:** RTS Seneca | Route Deviation and Dial-A-Ride
- **Current Facility Location:** RTS Seneca currently operates from the Seneca County Office Building located at 1 DiPronio Drive Waterloo, NY 13165. The service has a fleet of eight 22-foot and 32-foot buses and 14 employees. The location provides a point of administration and dispatch and outdoor bus storage. Preventative maintenance and repairs are done through an arrangement with RTS Ontario at that location. Bus Operators fuel the buses at local gas stations.
- **Problems:** Administrative employees work in a small office inside the County Building. The buses are parked outdoors in the County Building's parking lot during the summer months. However, the lot has problems with standing water and ice during the fall, winter, and spring months. As a stopgap solution, the buses are parked in the parking lot near the Seneca County Office for the Aging located at 2465 Bonadent Dr, Waterloo, NY 13165 during seasonal rain and freezing temperatures. The location is 0.3 miles away from the Seneca County Building. Bus Operators must enter the County Building and go to the administrative office to get their daily work assignment, then exit the building and walk to their bus or drive their personal vehicle to the Bonadent parking lot to get their bus. During the summer months, Seneca County provides access to an outdoor hose which the Bus Operators use to wash the exterior of the buses. During the winter, the hose is unavailable. Bus Operators fuel the

## RTS SENECA FACILITY SITE LOCATION REPORT

buses at local gas stations. All repairs noted during vehicle inspections or preventative maintenance are done through an arrangement with RTS Ontario, using their facilities and employees.

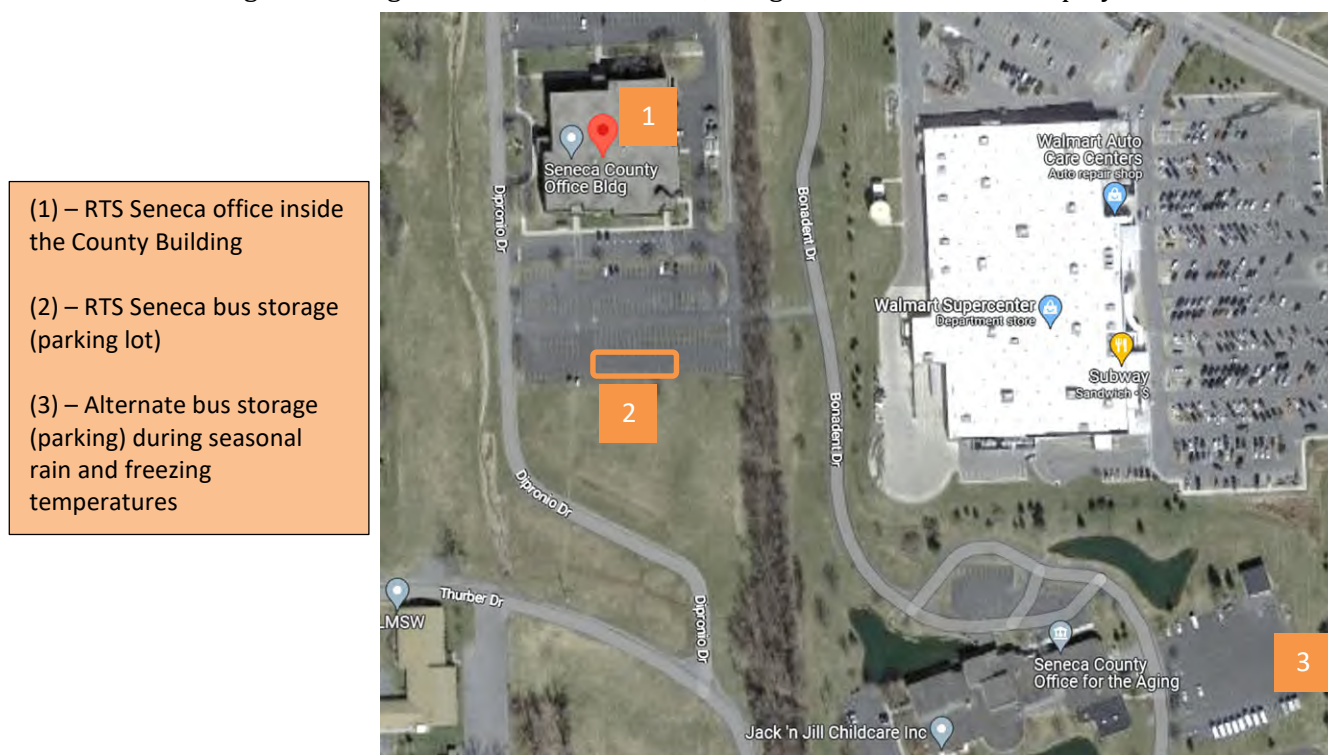


Figure 28—Existing site location for RTS Seneca

Discussions about the need to relocate to an improved facility or to a new facility have been ongoing for many years (2016). At various points, RGRTA did get input from several architecture and engineering firms about the acreage, square footage, and building components best suited to provide sheltered storage for the buses and consolidate administrative operations on a dedicated site.

RGRTA determined that a new RTS Seneca bus facility would require property acquisition of at least 1.8 acres. The facility would include:

- Construction of a pre-engineered single story steel structure for bus storage, administrative office space, bus washing area, and support space (e.g., break room);
- Parking and circulation space outdoors and fencing;
- Sidewalks, lighting, landscaping, utilities, stormwater management, and sanitary sewage connection.

### 2.0. Site Identification

RGRTA internally evaluated nearby areas for available sites that were at least 1.8 acres and able to accommodate a 13,000 square foot facility. After applying the Site Selection Criteria, we identified three site locations. We reviewed the sites for cumulative impacts that might adversely affect the communities. There would be no displacement of residents at the three locations considered for site selection: Site A—23 Thurber Drive Waterloo, NY 13165 Census Tract 9505; Site B—31 Thurber Drive Waterloo, NY 13165 Census Tract 9505; Site C—2465 Bonadent Drive, Waterloo, NY 13165 Census Tract 9504. Site B would require acquisition of the property at 17 Thurber Drive (previously LifeCare Medical Associates which was up for sale and purchased by HMI Mechanical Systems). Site C would require using the existing County facility (Seneca County Health Department, Seneca County Office for the Aging) for the administrative and employee support space.

## RTS SENECA FACILITY SITE LOCATION REPORT

Site A—23 Thurber Drive Waterloo, NY 13165 Census Tract 9505	
Who is impacted by selecting this site?	Seneca County Health Department   Community Counseling Center of Seneca County, which includes the following services: Mental Health Clinic; Youth Counseling Services; Alcoholism Treatment Program.
Will selecting this site displace residents or businesses?	No
List other similar facilities nearby (maintenance, storage, and operations)	There are no facilities nearby related to transit/vehicle maintenance, storage, or operations. There is a domestic HVAC and plumbing business (HMI Mechanical Systems). There is a residential area that begins 1,056 feet away from the site on Carlton Road, which connects to Thurber Drive and Dipronio Drive. The Seneca County Office for the Aging building is nearby and a Walmart Supercenter with an auto repair shop is also nearby.
Site B—31 Thurber Drive Waterloo, NY 13165 Census Tract 9505	
Who is impacted by selecting this site?	<ul style="list-style-type: none"> <li>▪ Approximately 7 residences on Thurber Drive</li> <li>▪ A domestic HVAC and plumbing business (HMI Mechanical Systems, previously LifeCare Medical Associates).</li> </ul>
Will selecting this site displace residents or businesses?	No
List other similar facilities nearby (maintenance, storage, and operations)	There are no facilities nearby related to transit/vehicle maintenance, storage, or operations. The Seneca County Office for the Aging building is nearby and a Walmart Supercenter with an auto repair shop is also nearby.
Site C—2465 Bonadent Drive. Waterloo, NY 13165 Census Tract 9504	
Who is impacted by selecting this site?	Seneca County Office for the Aging and Seneca County Health Department
Will selecting this site displace residents or businesses?	No
List other similar facilities nearby (maintenance, storage, and operations)	There are no facilities nearby related to transit/vehicle maintenance, storage, or operations. The Seneca County Office for the Aging and Seneca County Health Department are at the location. A Walmart Supercenter with an auto repair shop is directly behind the property.



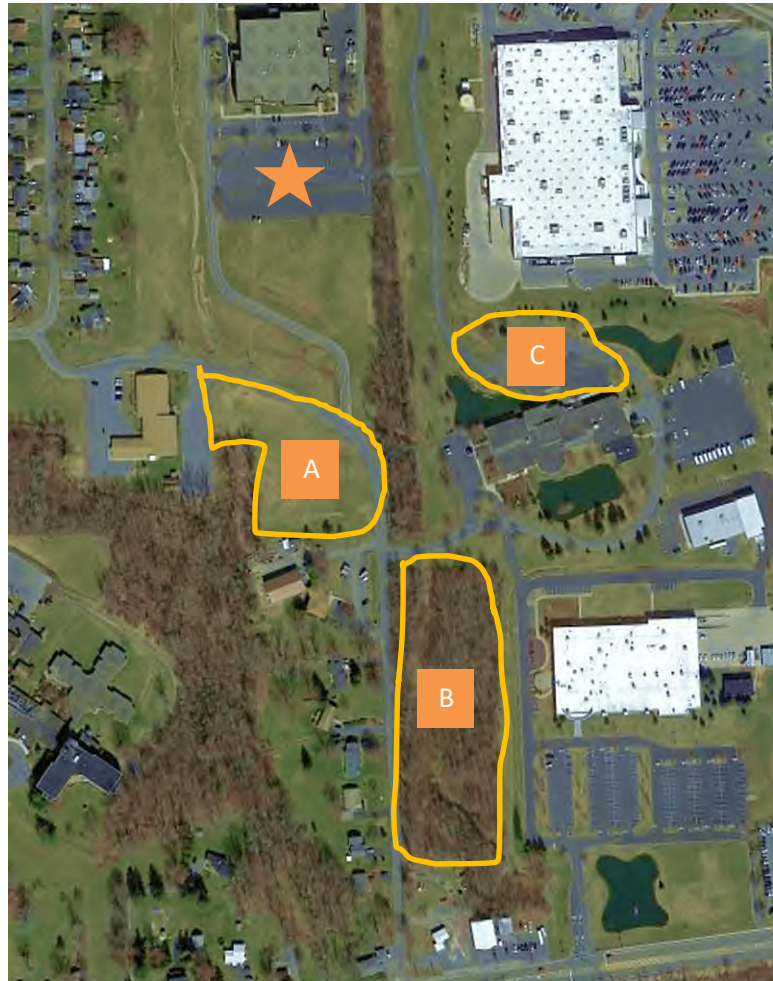
## RTS SENECA FACILITY SITE LOCATION REPORT

\* — Existing RTS Seneca office inside the County Building

**Site A – 23 Thurber Drive Waterloo, NY  
13165 Census Tract 9505**

**Site B – 31 Thurber Drive Waterloo, NY  
13165 Census Tract 9505**

**Site C — 2465 Bonadent Drive,  
Waterloo, NY 13165 Census Tract 9504**



Site B would have required acquisition of a business building 17 Thurber Drive. During 1992 through 2013 the building was used variously by an appraiser, a church, and a medical office. The property was sold to HMI Mechanical Systems sometime in 2016. Site C was considered because Seneca County was consolidating some of its offices and suggested that RTS Seneca could make use of the building and space. The outcome would have been similar to the existing location, with the possibility of constructing an enclosed shelter to store the fleet.

We engaged Watts Architectural & Engineering Firm to complete a Phase I Environmental Site Assessment of Site A in September 2016. We worked with architecture and engineering firms to develop preliminary designs. The property for Site A was owned by Seneca County. However, changes in Seneca County management during 2018-2019 halted the planning process for a period.

## RTS SENECA FACILITY SITE LOCATION REPORT

### 3.0. Equity Analysis

We conducted a Title VI equity analysis on January 24, 2023.

Current site: 1 DiPronio Drive Waterloo, NY 13165 Census Tract 9505

	Site A 23 Thurber Drive	Site B 31 Thurber Drive	Site C 2465 Bonadent Drive	Seneca County
<b>Total Population</b>	3738	3738	2545	33900
<b>White</b>	3348	3348	2317	30411
<b>Non-White</b>	390	390	228	3489
<b>Non-White %</b>	10.4%	10.4%	9.0%	10.3%
<b>Population under Poverty Line</b>	406	406	295	3688
<b>Percentage under Poverty Line</b>	11.6%	11.6%	11.6%	11.9%
<b>Median Income (Households)</b>	\$28,777	\$28,777	\$29,775	\$32,575
<b>LEP %</b>	1.0%	1.0%	2.5%	0.8%
<b>Disparate Impact greater than +/- 20 percent?</b>	NO	NO	NO	
<b>Disproportionate Burden greater than +/- 20 percent?</b>	NO	NO	NO	

None of the sites trigger the thresholds for disparate impact or disproportionate burden. Sites A and B have a slightly higher Non-White % than the County average (10.4% compared to 10.3%). All three sites have higher percentages of LEP populations than the County average of 0.8%, with Site C the highest at 2.5%. All three sites are slightly under the County percentage for low-income (11.6% compared to 11.9%).

Further evaluation of Site A (23 Thurber Drive) provided the following information:

- County-owned and vacant; and
- Acquisition would not result in the displacement or relocation of any individuals or businesses; and
- Location is a mixed-use area with significant development over the past 20-30 years consisting of institutional, commercial, and residential properties.

The area in vicinity of the Site A is a medium density commercial/ business park area with a residential neighborhood located to the northwest. Property users in the surrounding vicinity include a Walmart Supercenter, a hotel (Quality Inn), numerous restaurants, Seneca County municipal buildings (Department of Motor vehicles, Clerk, Health Department), and several health-related institutional campuses (Finger Lakes Health, Seneca Nursing & Rehabilitation Center). Most properties have either significant landscaped setbacks and/or are surrounded by parking lots.

Access to Site A would be from Thurber Drive, a two-lane two-way road. The project would relocate existing bus operations from the County office building on DiPronio Drive about ¼ mile from the project site but would not result in any substantial changes to traffic patterns or introduce any new operations or traffic to the area. The RTS Seneca fleet typically leaves the site between 6 AM and 8 AM and returns between 5 PM and 7 PM. This level of operations would not change because of the project. In addition to the bus garages, the project would also include approximately 20 automobile parking spaces, which would adequately accommodate site operations.

## RTS SENECA FACILITY SITE LOCATION REPORT

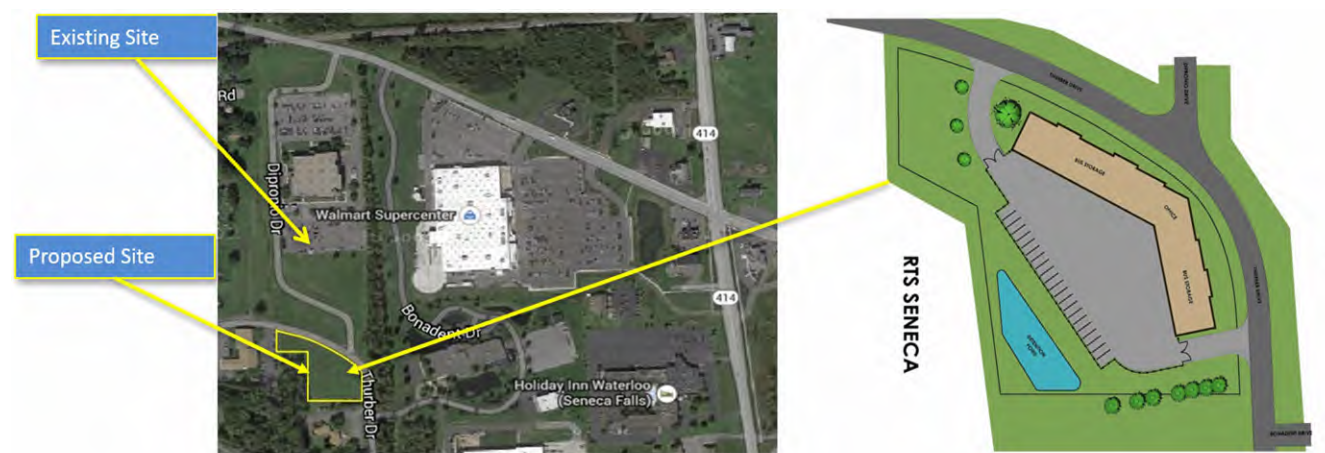


Figure 29—Site A 23 Thurber Drive with Conceptual Diagram

### 4.0. Community Outreach

During August 2021, we engaged in communication with the following offices:

- U.S. Army Corps of Engineers
- U.S. Fish and Wildlife Service
- New York State Department of Environmental Conservation
- New York State Historic Preservation Office
- Seneca County
- Seneca County Planning Board
- Seneca County Board of Supervisors
- Seneca County Highway Department
- Village of Waterloo
- Zoning Board of Appeals
- Department of Public Works
- Town Supervisor

### 5.0. Site Determination

RGRТА engaged Environmental Design & Research, Landscape Architecture, Engineering, & Environmental Services, D.P.C. (EDR) to conduct an Archaeological Survey of Site A. The survey determined that no archaeological sites or historic structures are located within limits of proposed ground disturbance for the project. On August 5, 2021, the RGRТА Board of Commissioners authorized the Authority to award a contract for professional design services and construction administration (Passero Associates, DPC).

On November 4, 2021, the Authority fulfilled its obligation to comply with the New York State Environmental Quality Review Act ("SEQR") by establishing itself as the lead agency and issuing a negative declaration with respect to the proposed project and the location site of 23 Thurber Drive. On November 04, 2021, the RGRТА Board of Commissioners authorized the Authority to enter into a Purchase and Sale Agreement with Seneca County to purchase the 1.8 acres of land located at the intersection of Thurber Drive and DiPronio Drive in the Village of Waterloo, Seneca County, NY. The land acquisition was funded with Federal (80%), New York State (10%) and Authority (10%) funds.



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## RTS SENECA FACILITY SITE LOCATION REPORT

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*Figure 30—Rendering of new RTS Seneca facility.*

On December 16, 2021, the Seneca County Board of Supervisors authorized and directed the sale of the County Owned 1.790 Acre Parcel on Thurber Drive to RGRTA. The land purchase was completed on January 31, 2022. The site design was approved on January 20, 2023. Bidding preparations are underway for construction services.

While 23 Thurber Drive (Site A) has no disparate impact, we did not follow the Title VI analysis sequence for the determination, since the environmental review, design, and land purchase occurred before the Title VI analysis. We attribute this deficiency of process to lack of knowledge and experience, and not aligning communication or milestones between the Engineering and Legal Affairs departments. It has taken some time to understand how SEQR and NEPA requirements differ from Title VI site determination requirements and how to integrate the steps into an overall capital project timeline and process. We are working to improve the process and are applying the learning to the RTS Access facility, Zero-Emission Depot, RTS Genesee, and RTS Wayne facility projects.

# RTS WAYNE FACILITY SITE LOCATION REPORT

## 1.0. RTS Wayne Project Description

GTC Nine-County Planning Region &  
Rochester Metropolitan Planning Area



Service	Current Facility Location	Facility Problems	Proposed Solutions
Route Deviation Dial-A-Ride Wayne County	<ul style="list-style-type: none"> <li>7227 State Route 31 Lyons, NY 14489</li> <li>Wayne County Highway Department Facilities</li> </ul>	<ul style="list-style-type: none"> <li>Limited space</li> <li>Limited privacy for 1:1 meetings or conference calls</li> <li>No space to hold a company meeting</li> <li>Property is not large enough to expand current office</li> <li>Limited space to build new bus barns</li> <li>Buses are stored outdoors in a parking lot</li> <li>Small administrative space</li> </ul>	<ul style="list-style-type: none"> <li>Relocate to a new site</li> <li>Build a new facility</li> <li>Use existing location and build new facility</li> </ul>

RTS Wayne provides service on 10 deviated routes and Dial-A-Ride service in Wayne County. The company has an annual ridership of 73,946, a fleet of 42 buses, 61 employees, and a service area population of 89,918. The fleet includes 25-foot, 30-foot, and 32-foot buses such as the Phoenix Ford E450 Type III, Aerolite El Dorado IC Diesel, Aerotech El Dorado International Type VI, and AeroElite El Dorado International Type VI.

RTS Wayne is co-located at 7227 State Route 31 Lyons, NY 14489 at the Wayne County Highway Department Facilities. The co-location provides RTS Wayne with office space, outdoor parking for 42 buses, and maintenance services. In 2021, Wayne County Highway Department Officials began analyzing the site for future County construction projects. The County Officials asked RTS Wayne whether space would need to be allocated for the construction of bus garages to be co-located at the 7227 State Route 31 location.

## RTS WAYNE FACILITY SITE LOCATION REPORT



Figure 31—Aerial view of Wayne County Highway Department, where RTS Wayne is co-located.

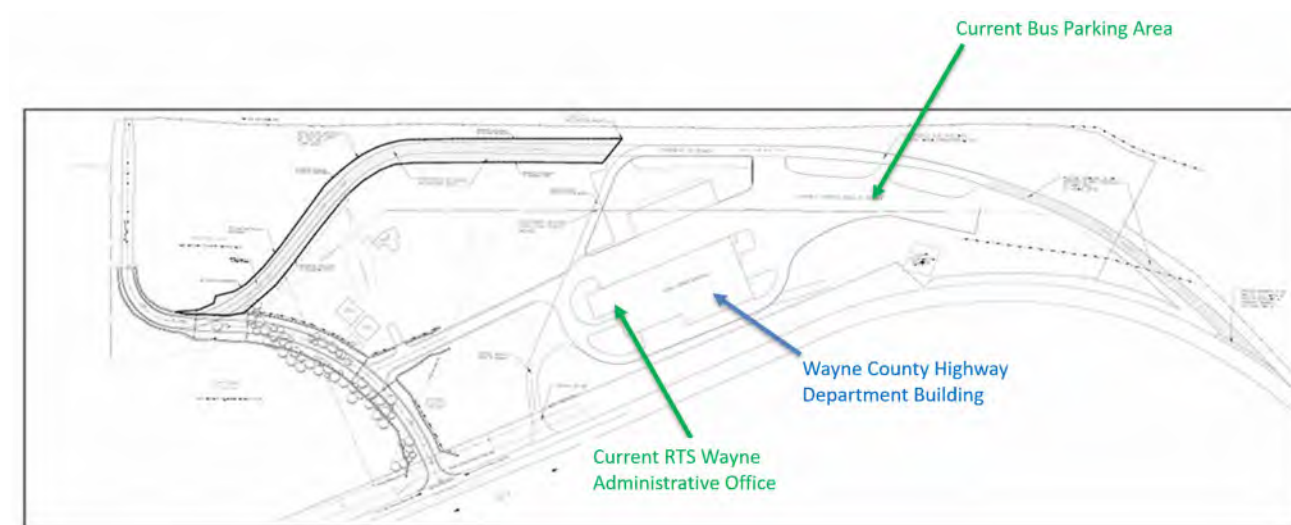


Figure 32—Diagram of RTS Wayne's office and bus parking

### 2.0. Site Identification

Continuing to co-locate a facility at the Wayne County Highway Building area provides RTS Wayne with access to the County's fueling and maintenance services.

On June 24, 2021, the RGRTA Board of Commissioners authorized award of a contract to a professional engineering and design service firm ("Passero Associates") to complete a 30% design for a proposed RTS Wayne Bus facility adjacent to the existing bus parking lot at the Wayne County Highway Department.

### 3.0. Equity Analysis

We conducted an equity analysis of the Wayne County Highway location in March 2023.

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## RTS WAYNE FACILITY SITE LOCATION REPORT

	7227 State Route 31 Lyons, NY 14489 (Tract 210)	Wayne County
Total Population	6,121	91,283
White	5,510	79,230
Non-White	611	12,053
Non-White %	10.0%	13.2%
Population under Poverty Line	622	10,127
Percentage under Poverty Line	10.2%	11.1%
Median Income (Households)	\$59,575	\$64,152
LEP %	4.2%	0.9%
Disparate Impact greater than +/- 20 percent?	NO	
Disproportionate Burden greater than +/- 20 percent?	NO	

Co-locating at the 7227 State Route site would not trigger the thresholds for Disparate Impact or Disproportionate Burden. The Non-White % and Percentage Under the Poverty Line are lower than the County averages (13.2% and 11.1%).

### 4.0. Site Determination

In reviewing the offer from Wayne County and the Passero design proposal, the Authority determined that RTS Wayne would need space for 4-5 bus storage barns, 1 bus wash bay, and expansion of office space. The office space should have space for a dedicated meeting room, a larger break room, multiple office areas, and an improved record retention area.

We concluded that RTS Wayne's overall needs for vehicle storage and office space will be greater than what the County can provide without significant impact to their operation.

As a result, RGRTA is searching for additional site locations.

In compliance with Title 49 CFR Section 21.9(b)(3), RGRTA will proceed with the following activities during the 2023-2026 program period:

- Identify potential sites and conduct a Title VI equity analysis to compare the equity impacts of siting alternatives (at the census tract level);
- Analyze other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result;
- Conduct outreach to persons potentially impacted by the siting of facilities;
- Understand what the adverse impacts, if any, exist from the location;
- Identify whether there are mitigations that would reduce or eliminate adverse impacts;
- If disparate impact exists, analyze site location alternatives which have the least disparate impact;
- Evaluate whether there is a substantial legitimate justification for locating the project in a location with disparate impact, if such a situation arises.

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## **ADDENDUM**

The “Activity Tracker” for the RTS Access Facility Site Public Participation and Outreach activities is included as an addendum to the report.

The Activity Tracker describes the public outreach that occurred in April-June 2022 and activities that occurred or were planned to occur during February-May 2023.

### **New RTS Access Facility Title VI Public Participation Activity Tracker Calendar Year 2023**



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## ADDENDUM

### 1.0. Key Methods

RTS Access/RGRTA will invite audiences to **learn** more about this project by:

1. Visiting [myRTS.com/access](https://myRTS.com/access) and viewing a recorded presentation [provide new video]
2. Attending a stakeholder meeting
3. Attending one or more Public Information Meetings
4. Contacting RTS Access at 585-224-8330, option #3.

RTS Access/RGRTA will **solicit comment** from the target audiences by:

1. Having time in the Public Information Meeting agenda dedicated to receiving questions and comments.
2. Asking stakeholders to provide comments during in-person meetings.
3. Providing comment cards/forms at the stakeholder/Public Information Meetings.
4. Publishing a notice soliciting comment in the Democrat & Chronicle.
5. Letters mailed to the neighborhood residents of Census Tract 88.01.
6. Putting instructions in on the TC Monitors to leave comments using the Comment Cards at the Transit Center or through the Contact Us form at [myRTS.com/contact-us](https://myRTS.com/contact-us) with the subject heading “RTS Access Facility.”
7. Putting instructions in newsletters, social media posts, and on the website to send in comments through the Contact Us form at [myRTS.com/contact-us](https://myRTS.com/contact-us) with the subject heading “RTS Access Facility.”
8. Putting instructions in newsletters, social media posts, and on the website to leave a comment by calling RTS Access at 585-224-8330, option #3.



## ADDENDUM

### 2.0. Project Schedule

Selection of 1500-1600 Lexington Ave. as the location for a new RTS Access facility.

<i>Capital Project Task</i>	<i>Actual Date</i>	<i>Estimated Date</i>
Preliminary Design Complete	<b>February 2022</b>	
Complete Environmental Review		<b>FEBRUARY 2023</b>
Title VI Equity Analysis Complete	<b>January 2023</b>	
Public Participation Activities Complete		<b>FEBRUARY 2023 – AUGUST 2023</b>
Purchase Property		<b>TBD</b>
Final Design Complete		<b>TBD</b>
Construction Start		<b>TBD</b>
Construction Complete		<b>DECEMBER 2025</b>

### 3.0. Activities for 2023

Project leaders anticipate they will make an offer to purchase the 1500-1600 Lexington Ave. property by Q1 FY24.

The Title VI Program Plan submission is due to the FTA by June 01, 2023. The Title VI Program Plan will report any activities either completed or anticipated to be completed by May 31, 2023. This Tracker will prioritize those tasks that are most feasible and likely to complete by May 31, 2023.

It is likely that additional activities and tasks beyond May 31, 2023 will be necessary. The timelines can be adapted to occur after June 01, 2023 but would ideally conclude **before** the property purchase is completed. If it is not possible to conclude the activities before purchasing the property, an acceptable compromise is to prioritize the completion of public participation activities to complete as soon as is possible after the purchase and before further design or construction activities start.

#### 3.1. What This Tracker Does Not Cover

This tracker tool does not cover the tasks for broader communications with employees or outreach/promotion to RTS Access customers, the disability community, or community organizations. While important, these are not activities necessary for Title VI, are not covered in this document, and may be managed and tracked elsewhere.

#### 3.2. Activity Schedule

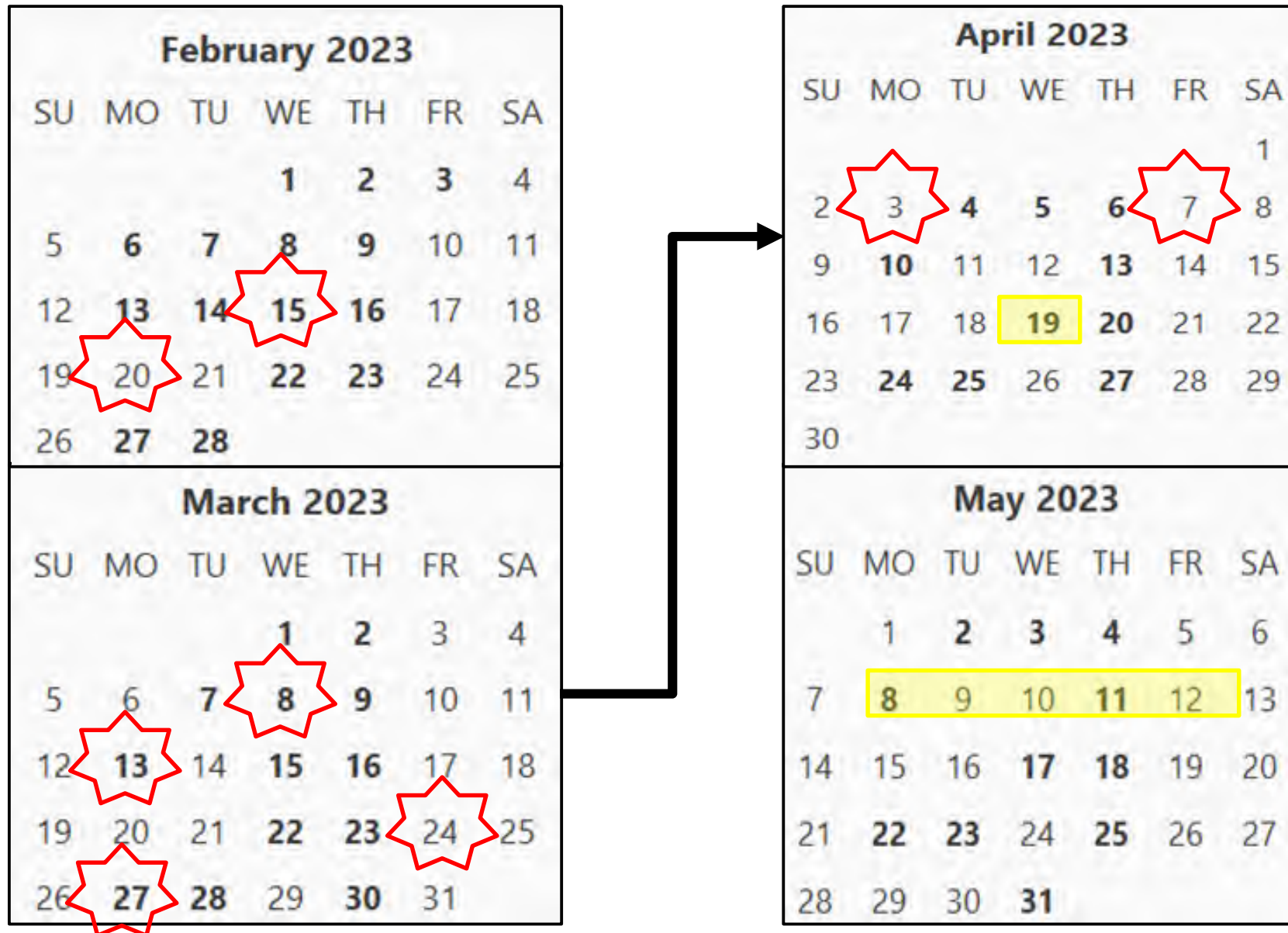
The high priority activities should complete on or before May 31, 2023. High priorities are in **red**.

[Title VI Program Plan June 2023-2026, Version 6](#)

## ADDENDUM

	Task	Due	Responsible	Dependencies
1.	Meeting between RGRTA CEO and Edison Tech High School contact	Done	Miguel Velazquez	Miguel's availability
2.	Schedule date(s) for Public Information Meeting(s)	Done	Laura Kenyon, Jamie Mott	Item 1
3.	Determine comment period	Done	Dan DeLaus, Sara Molyneux	Item 2 w/ consideration on item 9
4.	Updated communication with contacts for Ontario Bus	Done	Jamie Mott, Tom Brede, Laura Kenyon	Items 2 and 3
5.	Confirm the mail house can do a mass mailing to residents of census tract 88.01	Done	Laura Kenyon	
6.	Update PPT presentation for new audience	Done	Laura Kenyon, Jamie Mott, Sara Molyneux	Items 2 and 3
7.	Produce video of presentation and post on <a href="http://www.myrts.com">www.myrts.com</a>	Done	Laura Kenyon, Aracelis Perez-Diaz	Item 6
8.	Prepare letter for residents of census tract 88.01	Done	Jamie Mott, Laura Kenyon	Items 2, 3, and 6
9.	Mass mailing to residents of census tract 88.01	Done	Laura Kenyon	Item 8
10.	Solicit comments / Advertise public information meeting(s) Send info to relevant lawmakers + ask if want to share	03/27/23 – 04/19/23	Laura Kenyon, Aracelis Perez-Diaz, Tom Brede	Item 8
11.	<b>Hold public information meeting and collect comments</b>	April 19 <sup>th</sup> – May 12 <sup>th</sup>	Jamie Mott, Dave Belaskas, Dan DeLaus, Sara Molyneux, Miguel Velazquez, Tom Brede, Laura Kenyon	Items 1-10
12.	Invite Agency Contacts to a Public Information Meeting (Zoom)	TBD	Jamie Mott	
13.	Collect, review, organize, and summarize all comments	TBD	Cheryl Nieskes, Sara Molyneux	Items 11 and 3
14.	Update elected/appointed officials	TBD	Tom Brede, Miguel Velazquez Jamie Mott	
15.	Responses to people who commented	TBD	Sara Molyneux, Laura Kenyon Jamie Mott, Dan DeLaus	Completion of item 13
16.	Outreach to RTS Access + Disability Community + Census Tract 141.01 population if necessary (info meeting, comments)	TBD	Laura Kenyon, Jamie Mott, Tom Brede	

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**ADDENDUM**

## ADDENDUM

### 3.3. Activity Tracker

#### 7. ~~Meeting or conversation - CEO and Edison Tech Superintendent~~

Priority	Status	Due Date	Audience	Responsible	Notes
<b>High</b>	<i>DONE</i>	02/15/2023	Edison Tech	Miguel Velazquez	Miguel emailed Jacob Scott on 01/27/23 with request to respond to items listed below by 02/15/23.

Subtasks Necessary to Complete Activity	Done	Notes
Schedule or hold conversation	✓	Miguel sent email to Jacob Scott on 01/27/23
Give background as necessary and obtain input on the project	✓	Does Edison Tech support the project? Do they have concerns/comments?
Ask to use Edison Tech auditorium for Public Information Meeting(s)	✓	Yes
Identify dates when the auditorium can be used	✓	April and May
Identify school communication channels we could use deploy notice of meeting	✓	Would they post the description and date on their school online calendar, digital signs (if they have), in communications to parents and employees, school board?
<b>ADA accessible meeting space with seats for at least 50, tech to project from a laptop and, depending on the size of the space, a microphone for the presenter(s) and audience questions.</b>  Chair and small desk for a stenographer (if we go the route), a chair for an ASL interpreter near the front of the room, and a 4-6 ft table with chairs for RTS staff to welcome people and sign them in	✓	Jacob Scott provided Building Permit

## ADDENDUM

### 8. ~~Schedule date(s) for Public Information Meeting(s)~~

Priority	Status	Due Date	Audience	Responsible	Notes
<b>High</b>	<i>DONE</i>	02/20/23	Stakeholders, residents, customers	Laura Kenyon Jamie Mott	April 19 <sup>th</sup>

Subtasks Necessary to Complete Activity	Done	Notes
Completion of item 1		
If Edison Tech auditorium not available, selection of alt place	✓	Not necessary – Edison Tech is available

### 9. ~~Determine comment period~~

Priority	Status	Due Date	Audience	Responsible	Notes
<b>High</b>	<i>DONE</i>	02/20/23	Stakeholders, residents, customers	Dan DeLaus Sara Molyneux	April 10 <sup>th</sup> – May 12 <sup>th</sup>  4 weeks recommended based on letter mailing and the Pub Info dates (could be 6 weeks)

Subtasks Necessary to Complete Activity	Done	Notes
Item 2 w/ consideration on item 9		
Discuss what is fair / reasonable for an end date (we have different start dates for residents versus meeting attendees)	✓	5 weeks if the letters mail out April 3, then the “start” is April 10 <sup>th</sup>

### 10. ~~Updated communication with Ontario Bus Company~~

Priority	Status	Due Date	Audience	Responsible	Notes
<b>High</b>	<i>CLOSED</i>	03/02/2023	Ontario Bus, Inc.	Jamie Mott Dan DeLaus	Called General Manager on March 01 but did not make contact. Sent an email to General

**ADDENDUM**

Priority	Status	Due Date	Audience	Responsible	Notes
					Manager on March 03, 2023 – again, no response.

Subtasks Necessary to Complete Activity	Done	Notes
Identify best contact	✓	Ontario Bus, Inc.   1410 Lexington Ave. Rochester, NY 14606   <a href="https://ontariobus.us/about-us/">https://ontariobus.us/about-us/</a>
Call	✓	Laurie Wilken scheduled Dan DeLaus and Jamie Mott to call Ontario Bus Company March 01, 2023

~~11. Confirm that the mail house can perform a mass mailing to residents of census tract 88.01~~

Priority	Status	Due Date	Audience		Responsible	Notes
<b>High</b>	<i>DONE</i>	01/26/23	Residents of streets listed for tract 88.01		Laura Kenyon	

Subtasks Necessary to Complete Activity	Done	Notes
Inquire on what mail house needs	✓	Area within major streets and street names
Confirm what the mail house can do	✓	Can do multiple mailings (mailing list), 250 people. Send letter and they will print, stuff, address, mail
Identify lead-time	✓	3 weeks ahead of event

~~12. Update PPT presentation~~

Priority	Status	Due Date	Audience	Responsible	Notes
<b>High</b>	<i>DONE</i>	03/24/2023	Residents' tract 88.01	Laura Kenyon Jamie Mott	Completed 03/24/23



## ADDENDUM

Subtasks Necessary to Complete Activity	Done	Notes
Outline of new slides and script	✓	Done – group discussion on 02/24/2023
Explain RTS Access serves disability community	✓	Done – Laura’s drafted ppt 03/02/2023
Explain benefits to eligible customers (improves quality of life)	✓	Done – Laura’s drafted ppt 03/02/2023
Show bus type, current and future fleet size	✓	Done – Laura’s drafted ppt 03/02/2023
Identify number of employees onsite daily	✓	Jamie to update numbers
Show the layout, explain operation features (wash buses, fuel buses, maintain buses, store buses, dispatch)	✓	Jamie to provide details in the drafted ppt
Show the traffic pattern	✓	Jamie to provide details in the drafted ppt
Explain peak times	✓	Jamie to provide details in the drafted ppt
Emphasize that we want to hear from people and how to provide comments	✓	Done – Laura’s drafted ppt 03/02/2023
Look for upcoming notices & public information meeting	✓	Done – Laura’s drafted ppt 03/02/2023

### 13. ~~Produce video of presentation with Spanish captions and close captioning and post on [www.myrts.com](http://www.myrts.com)~~

Priority	Status	Due Date	Audience	Responsible	Notes
<b>High</b>	<i>DONE</i>	03/27/23	Residents of tract 88.01	Laura Kenyon Aracelis Perez-Diaz Jamie Mott	Time to conduct the recorded presentation

Subtasks Necessary to Complete Activity

Done

Notes

**ADDENDUM**

Completion of item 6	✓	
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14. ~~Prepare letter for residents of census tract 88.01~~

Priority	Status	Due Date	Audience	Responsible	Notes
<b>High</b>	<i>DONE</i>	03/24/2023	Residents of streets listed for tract 88.01	Jamie Mott Laura Kenyon	Completed on 03/24/23

Subtasks Necessary to Complete Activity	Done	Notes
Explain the purpose, benefit to disability community, and key operating facts (# buses, bus types, peak hours, traffic pattern)	✓	Includes instructions on how to get assistance in Spanish, Chinese, Vietnamese, Tagalog
Invite to watch video and give the location of the video online (web address)	✓	Depends on item 7
Invite to attend Public Information Meeting(s) & provide date(s) and location(s) and provide comments	✓	Depends on items 2, 3, and 6
Invite to send comments via Contact Us	✓	
Provide comment period	✓	Depends on item 3

## 15. Mass mailing to residents of census tract 88.01

Priority	Status	Due Date	Audience	Responsible	Notes
<b>High</b>	<i>DONE</i>	04/03/23	Residents of tract 88.01	Laura Kenyon	Mailed out 03/29/23

Subtasks Necessary to Complete Activity	Done	Notes
Completion of item 8		

## ADDENDUM

Confirmation on when we want residents to receive letter	✓	Week of April 3
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### 16. Solicit comments / Advertise public information meeting(s)

Priority	Status	Due Date	Audience	Responsible	Notes
<b>High</b>	<i>Assigned</i>	03/27/23 – 04/16/23	Stakeholders, residents, customers	Laura Kenyon Aracelis Perez-Diaz	Video is on the website, posters are on RTS buses, letters are mailed out as of 03/29/23.

Subtasks Necessary to Complete Activity	Done	Notes
Instruct people on how to title their comment if using Contact Us	✓	
Instruct CSRs on how to categorize and escalate comments in CRM	✓	
Website	✓	
Social media post		
Transit Center slide	✓	
Democrat & Chronicle notice	✓	
Flyers on buses	✓	
Email to customers (RTS Access) and agency contacts		Clarify that RTS Access customers / disability community will have other opportunities to learn and comment; this is primarily for nearby neighborhoods
Blurb in newsletter		

**ADDENDUM**

Edison Tech channels		Electronic signs, website, notices that go to parents/teachers
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**17. Hold public information meeting and collect comments**

Priority	Status	Due Date	Audience	Responsible	Notes
<b>High</b>	<i>Assigned</i>	April 19th	Stakeholders, residents, customers	Jamie Mott Dave Belaskas Dan DeLaus Sara Molyneux Miguel Velazquez Tom Brede Laura Kenyon	Stenographer or court reporter to record comments  Comment period will run until May 12 <sup>th</sup>

Subtasks Necessary to Complete Activity	Done	Notes
Book transcriptionist		
Book ASL or Spanish interpreter	✓	ASL interpreter is booked; Spanish-speaking RTS staff will be present
Prepare road signs to direct people where to park		
People to direct participants to auditorium		
Road supervisor for event		
Knowledge of AV set up and assistance for running it		
Include a good chunk of time on the agenda dedicated just to allowing people to comment		
Sheets with names and addresses (so we can identify commenters)		
Sign in sheets for other participants (so we can identify commenters)		

## ADDENDUM

Subtasks Necessary to Complete Activity	Done	Notes
<p><b>We will need an ADA accessible meeting space with seats for at least 50, tech to project from a laptop and, depending on the size of the space, a microphone for the presenter(s) and audience questions.</b></p> <p>We will also need a chair and small desk for a transcriptionist (if we go the route), a chair for an ASL interpreter near the front of the room, and a 4-6 ft table with chairs for RTS staff to welcome people and sign them in</p>	✓	Edison Tech library is accessible and has adequate space and technology

### 18. Host an Information Meeting for Agency Contacts (Zoom)

Priority	Status	Due Date	Audience	Responsible	Notes
Low	<i>Assigned</i>	TBD	Agency contacts	Jamie Mott	Explain status and that more outreach will be coming

Subtasks Necessary to Complete Activity	Done	Notes
Invite agency contacts		
Determine date/location/format		

### 19. Collect, organize, review, and summarize comments

Priority	Status	Due Date	Audience	Responsible	Notes
Medium	<i>Assigned</i>	TBD	Agency contacts	Cheryl Nieskes Sara Molyneux	Get all comments from various channels

Subtasks Necessary to Complete Activity	Done	Notes
Get comments from CRM		Cheryl and Laura
Get comments recorded by stenographer		Cheryl and Laura

**ADDENDUM**

Subtasks Necessary to Complete Activity	Done	Notes
Get comments from Comment Cards		Cheryl and Laura
Get comments that may have gone directly to Jamie, Michele, Tom, or Miguel by phone		Cheryl
Provide all comments to Sara for summarization		Cheryl
Prepare a summary of key concerns and items for response		Sara

## 20. Update elected/appointed officials

Priority	Status	Due Date	Audience	Responsible	Notes
Medium	<i>Assigned</i>	TBD	Elected or appointed officials	Tom Brede Miguel Velazquez Jamie Mott Dan DeLaus	Overview of public response and status of the project

Subtasks Necessary to Complete Activity	Done	Notes
Commissioner Heather Bird or entire Board		
Jose Peo, Northwest District, Rochester City Council		
Mayor, County Executive		
Assembly member Josh Jensen, Senator Jeremy Cooney		
Robert Colby, District 20, Monroe County Legislature		
Congressional Delegation staff		



## ADDENDUM

### 21. Prepare responses to those who commented

Priority	Status	Due Date	Audience	Responsible	Notes
Medium	<i>Assigned</i>	TBD	Participants who provided concerns / unanswered questions	Sara Molyneux Laura Kenyon Jamie Mott Dan DeLaus	

Subtasks Necessary to Complete Activity	Done	Notes
Identify persons whose comments or questions were not already addressed in the context of the public info meeting or phone call		
Draft a collective letter or individual letters?		

### 22. Prepare outreach/public information meeting for disability community, RTS Access customers

Priority	Status	Due Date	Audience	Responsible	Notes
Medium	<i>Assigned</i>	TBD	Agency contacts	Laura Kenyon Jamie Mott Dan DeLaus	

Subtasks Necessary to Complete Activity	Done	Notes

## ADDENDUM

### 4.0. Goals, Equity Analysis, Audiences, and Key Messages

#### 4.1. Goals

1. Comply with FTA Title VI requirements for public participation, input from impacted groups, and outreach:
  - Promote awareness and understanding of the proposed location & construction of a new RTS Access facility at 1500 - 1600 Lexington Ave.
  - Provide stakeholders and neighborhood residents an opportunity to give feedback.
2. Highlight RTS Access as a vital, safe, and sustainable transportation services provider that connects the **disability** community and promotes a better quality of life.

#### 4.2. Title VI Equity Analysis

The population living less than 1 mile from 1500 Lexington has a significantly higher population of Non-White persons. The population under the poverty line is slightly lower than the City of Rochester but significantly higher than Monroe County. While the site location passes the equity test compared to other locations, the test shows potential impact and burden for people living near the new facility. Per requirements, we must educate the residents about the project and engage them to provide input, so that we can address concerns, if any.

Title VI Equity Analysis January 2023	1500 Lexington Ave. Census Tract 141.04	Polaris, Planet, Parkedge, Emerson, Stenson Streets   Christopher Crt.   Mt. Read Blvd Census Tract 88.01	City of Rochester	Monroe County Census Tract
<b>Total Population</b>	3649	6004	211100	757332
<b>White</b>	3291	1575	80616	559371
<b>Non-White</b>	358	4429	130484	197961
<b>Non-White %</b>	9.8%	73.77%	61.8%	26.1%
<b>Population under Poverty Line</b>	460	1654	59464	99940
<b>Percentage under Poverty Line</b>	12.6%	27.55%	29.3%	13.7%
<b>Median Income (Households)</b>	\$42,832	\$35,325	\$41,980	\$34,964
<b>LEP %</b>	5.3%	4.60%	6.7%	3.4%
<b>Disparate Impact &gt; +/- 20%?</b>	NO	YES		
<b>Disproportionate Burden &gt; +/- 20%?</b>	NO	YES		

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## ADDENDUM

### 4.3. Critical Target Audiences

1. Community stakeholders
2. Nearby neighborhood residents
3. Current RTS Access customers

#### Community Stakeholders

Businesses & Schools	Agency Contacts/Disability Organizations	Elected or Appointed Officials
<ol style="list-style-type: none"> <li>1. Edison Tech HS, Jacob Scott</li> <li>2. Ontario Bus, Victoria Yuzbasheva</li> </ol>	<ol style="list-style-type: none"> <li>3. Monroe County Long Term Care Council</li> <li>4. Lifetime Assistance, Marianne Thomas, Ernie Haywood</li> <li>5. Heritage Christian Services, Marianne Durrant</li> <li>6. Rochester Spinal Association, Chris Hilderbrant</li> <li>7. Lifespan, Ann Cook, Neeci Packard</li> <li>8. Center for Disability Rights NY</li> <li>9. ARC Monroe</li> <li>10. Goodwill Fingerlakes, Jennifer Lake</li> <li>11. CDS Monarch, Chad Williams</li> <li>12. Residential Center for Independent Living</li> <li>13. NYS Ed, Jennifer Geiger</li> <li>14. Monroe Hospital, Jacqueline Langberg</li> <li>15. Episcopal Senior Life, Rebecca Hurysz</li> </ol> <p>Marianne Thomas &lt;marianne.thomas@lifetimeassistance.org&gt;; Marianne Durrant &lt;mdurrant@HeritageChristianServices.org&gt;; Chris Hilderbrant &lt;childerbrant@rochesterspinalassociation.org&gt;; Ann Cook &lt;amcook@lifespan-roch.org&gt;; Neeci Packard &lt;NPackard@lifespan-roch.org&gt;; rapayton@cdrnys.org; wdavis@rcil.org; cromig@arcmonroe.org; Ernie Haywood &lt;ernie.haywood@lifetimeassistance.org&gt;; Jennifer Lake &lt;jlake@goodwillfingerlakes.org&gt;; Chad.williams@cdsmonarch.org; Jennifer</p>	<ol style="list-style-type: none"> <li>16. Heather Bird, RGRTA board member</li> <li>17. Jose Peo, Northwest District, Rochester City Council</li> <li>18. Rochester City Council/Mayor</li> <li>19. County Executive</li> <li>20. Assembly member Josh Jensen</li> <li>21. Senator Jeremy Cooney</li> <li>22. Robert Colby, District 20, Monroe County Legislature</li> <li>23. Congressional Delegation staff</li> </ol>

## ADDENDUM

	Geiger <Jennifer.Geiger@nysed.gov>; JacquelineLangberg@monroehosp.org; Rebecca Hurysz <rhurysz@episcopalseniorlife.org>	
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### Neighborhood Residents

Residents in census tract 88.01 who live on the streets less than 1 mile away from the site.

<ul style="list-style-type: none"> <li>• Polaris Street</li> <li>• Planet Street</li> <li>• Parkedge Street</li> <li>• Christopher Ct.</li> </ul>	<ul style="list-style-type: none"> <li>• Emerson Street</li> <li>• Stenson Street</li> <li>• Mt. Read Blvd between Lexington and Emerson</li> <li>• Colfax Street between Lexington and Emerson</li> </ul>
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### 4.4. Key Message Points

- A. RTS Access provides ADA complementary paratransit to eligible persons with disabilities. RTS Access allows eligible riders to reserve and schedule trips that are curb-to-curb in the Monroe County paratransit service area. The customers served may have one or more conditions that prevent them from being able to use RTS Connect all or some of the time: mobility disability, cognitive disability, sensory disability (Blind, low-vision, Deaf, low-hearing). The service is vital for the eligible customers to travel to their jobs, get medical care, do shopping, engage with friends and family, reach day treatment programs, attend faith services, and more. RTS Access service is required by FTA law and complies with ADA requirements under the FTA for paratransit. The population reliant on this service is growing, demand is growing, and RTS Access needs the ability to meet the demand.
- B. RTS Access proposes construction of a new facility at 1500-1600 Lexington Ave to be completed within the next 3 – 5 years. The proposed facility will be the central hub for all RTS Access' operational and administrative needs, and is expected to include:
  - Fleet storage and maintenance space for 100 vehicles
  - A bus washing bay
  - Fueling stations
  - A paratransit eligibility assessment area

## ADDENDUM

### 4.5. Applicable Criteria from the RGRTA Public Participation Plan 2020-2023

This Tracker identifies activities in accordance with our official public participation plan. Excerpts from the plan are shown here.

Page 5	Pages 2 - 3
<p><b>6.1 Public Outreach</b></p> <p>RGRTA posts information and accepts comments regarding the proposed changes in person (written or verbal), on its website, and via the USPS mail.</p> <p>RGRTA will:</p> <ul style="list-style-type: none"> <li>• Hold multiple public information meetings in affected communities;</li> <li>• Hold stakeholder group meetings; and</li> <li>• Present changes to elected government officials.</li> </ul> <p>RGRTA will consider the population likely to be affected and the resources available to determine how best to enhance participation by affected minority, low-income, and/or LEP persons. The purpose of these efforts is to include minority, low-income, and LEP populations in the planning stages.</p>	<p><b>5.4.B. Public Meetings</b></p> <p>Notices for public meetings are advertised on the RGRTA website, and via other social media outlets, as well as in buses, on bus shelters and community bulletin board locations in the service area where the meeting is scheduled to take place. Targeted customers may be sent an email, text, or direct mail communication regarding information meetings thought to be of particular interest to them. For example, a meeting seeking to provide information to and receive input from the paratransit community would be promoted by sending email or direct mail communication to all registered paratransit customers in addition to the general postings in the community and on the Authority website and Facebook and Twitter page.</p> <p><b>PUBLIC LISTENING/INFORMATION SESSIONS</b></p> <p>The sessions are held at handicap accessible facilities at varying times during the day to accommodate the schedules of those interested in attending. Meetings are facilitated by members of the RGRTA Service Planning Department along with staff from the Communications &amp; Marketing Department</p>

## ADDENDUM

and other relevant staff members as appropriate for the issue at hand.

Public Information Sessions typically include an American Sign Language Interpreter. If attendees request the presence of one or more language interpreters, or request other auxiliary aids, those are provided as well.

### 5.0. Samples of Content to Use In Deliverables

1. [Letter to Customers](#)

2. Website

Proposed RTS Access Facility video May 18, 2022 <https://youtu.be/T3F7YRb9wVo>

RTS Access is looking into building a new facility at 1500-1600 Lexington Ave., to be completed within the next 3 - 5 years.

The proposed facility will be the central hub for all RTS Access' operational and administrative needs and would include:

- Fleet storage and maintenance space for 100 vehicles
- A bus washing bay
- Fueling stations
- A paratransit eligibility assessment area

RTS Access and its parent authority, RGRTA, are looking for your feedback on this project. Please share your comments by [DATE] 2023 at 5pm ET through the Contact Us form at [myRTS.com/contact-us](https://myRTS.com/contact-us) with the subject heading "RTS Access Facility" or by calling us at 585-224-8330, option #3.

3. Bus Flyer

Share Your Thoughts: Proposed RTS Access Facility

RTS Access is looking into building a new facility at 1500-1600 Lexington Ave., to be completed within the next 3 - 5 years.

The proposed facility will be the central hub for all RTS Access' operational and administrative needs and would include:

Fleet storage and maintenance space for 100 vehicles

A bus washing bay

Fueling stations

A paratransit eligibility assessment area

To learn more and share your thoughts, visit [myRTS.com/access](https://myRTS.com/access), or call 585-224-8330, option #3 by [DATE], 2023 at 5pm ET.

4. D&C ad



## ADDENDUM

RTS Access is looking into building a new facility at 1500-1600 Lexington Ave., to be completed within the next 3 - 5 years. The proposed facility will be the central hub for all RTS Access' operational and administrative needs and would include:

Fleet storage and maintenance space for 100 vehicles

- A bus washing bay
- Fueling stations
- A paratransit eligibility assessment area

Full details about the project are available at [myRTS.com/access](https://myRTS.com/access). You may also contact us at 585-224-8330, option #3.

RTS Access and its parent authority, RGRTA, are looking for your feedback on this project. Please share your comments by [DATE] 2023 at 5pm ET through the Contact Us form at [myRTS.com/contact-us](https://myRTS.com/contact-us) with the subject heading "RTS Access Facility" or by calling us at 585-224-8330, option #3.

### 5. TC Slide

Share Your Thoughts: Proposed RTS Access Facility

[myRTS.com/Access](https://myRTS.com/Access)

Comment Cards at the Info Desk

### 6. Social Media

{Video link}

Learn more and share your thoughts on our proposed RTS Access facility.

## 6.0. Tactics Completed in 2022

During May and June of 2022, the team delivered materials to notify audiences and solicit input. The audiences were RTS Access Employees, RTS Access Customers, Agency Contacts, Community Members, and Stakeholders Edison Tech High School and Ontario Bus. We were unable to get a business contact for the Amazon Distribution site slated to occupy 1200 Lexington Avenue, so it is unlikely that a letter was mailed. Most of the work centered on external tactics for customers and community members. Minimal comments were received, with one from a community member and the rest from RTS Access customers. RTS Access customer comments were generally positive. The community member, Patricia Gavin, is a resident in census tract 88.01 who raised concerns about discriminatory impacts to residents. No responses were received from the stakeholders. The purchase price for the property increased. Public participation efforts were paused while project leaders sought alternative locations or purchasing options (July 2022 – December 2022).

### 1. Internal Tactics for Employees

Task	Audience	Responsible	Target Delivery Date	Status
Info memo for RTS Access staff	RTS Access Employees	Laura Kenyon Jamie Mott	Week of 5/16/22	Done 05/18/22

## ADDENDUM

### 2. External Tactics For Customers, Agency Contacts, Community Members

Task	Audience	Responsible	Target Delivery Date	Status
<b>Letter</b>	RTS Access Customers	Laura Kenyon	Week of 5/23/22	Done
	Agency Contacts	Jamie Mott		05/19/22
<b>On Hold message (RTS Access phone line)</b>	RTS Access Customers	Laura Kenyon	Week of 5/23/22	Done
	Agency Contacts	Jamie Mott		5/18/22
<b>Facility plan PPT presentation to use in Teams video</b>	RTS Access Customers	Jamie Mott	5/13/22	Done
	Agency Contacts			5/16/22
	Community Members			
<b>Teams video presenting construction plan posted to website with key message info</b>	RTS Access Customers	Laura Kenyon	5/16/22	Done
	Agency Contacts	Jamie Mott		5/18/22
	Community Members			
<b>Social media</b>	RTS Access Customers	Laura Kenyon	5/16/22	Done
	Agency Contacts	Aracelis Perez-Diaz		5/18/22
	Community Members			
<b>Democrat &amp; Chronical notice soliciting comments</b>	Public	Laura Kenyon	6/12/22	Done 6/12/22
<b>TC monitor slides</b>	RTS / RTS Access Customers @ TC	Laura Kenyon Aracelis Perez-Diaz	Week of 5/30/22	Done 5/30/22 – 06/03/22
<b>RTS Access bus posters</b>	RTS Access Customers	Aracelis Perez-Diaz Jamie Mott	Week of 5/23/22	Done 5/18/22 – 06/03/22

## ADDENDUM

### 3. External Tactics For Stakeholders

Task	Audience	Responsible	Target Delivery Date	Status
Letter from Bill Carpenter	Stakeholders/ businesses near proposed construction site <ul style="list-style-type: none"> <li>Edison Tech High School</li> <li>Ontario Bus</li> <li>Amazon Distribution*</li> </ul>	Tom Brede Jamie Mott	Week of 5/23/22	Letters for Edison Tech and Ontario Bus Done Mid-June

*\*Unable to confirm that a correct business contact; unlikely that a letter was sent*

## EXHIBITS

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# Exhibit 10: System-Wide Standards and Policies

## Exhibit 10 System-Wide Standards & Policies Table of Contents

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## TITLE VI PROGRAM POLICIES FOR SERVICE CHANGES & SERVICE MONITORING ON RTS FIXED ROUTES 2023 -2026

### BOARD APPROVED POLICY

Version: 4

Approved by Board of Commissioners on May 04, 2023

Next Review: Triennially or Substantive Change

Printed or downloaded copies are for reference only.  
For current versions go to the intraweb and click Policies and Procedures.

### 1.0 Title VI Program Policies

In accordance with the Federal Transit Administration's ("FTA") Title VI Circular 4702.1B effective October 1, 2012, Rochester Genesee Regional Transportation Authority ("RGRTA" or "the Authority") sets forth the following policies for RTS fixed routes to demonstrate compliance under Title VI of the Civil Rights Act of 1964:

- Major Service Change Policy, Disparate Impact Policy, and Disproportionate Burden Policy
- Monitoring Criteria for the Level of Service and Quality of Service

### 2.0 Definitions

- **Adverse Effect** shall be related to changes in transit service and shall be measured by the changes between the existing and proposed service levels that are deemed significant. Both reductions and additions in service levels may be deemed adverse depending on the degree of "disparate impact."
- **Authority** and **RGRTA** each mean the Rochester Genesee Regional Transportation Authority and its wholly controlled subsidiaries (RTS, RTS Access, RTS Genesee, RTS Livingston, RTS Ontario, RTS Orleans, RTS Seneca, RTS Wayne, and RTS Wyoming).
- **Disparate Impact** shall mean a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where (i) the recipient's policy or practice lacks a substantial legitimate justification; and where (ii) there exists one or more alternatives that would service the same legitimate objectives, but with less disproportionate effect on the basis of race color or national origin.
- **Disproportionate Burden** shall mean an adverse effect that places greater burden on a Low-Income Population versus other economic population groups.
- **Low-Income Customer** shall mean an individual whose family income falls within the poverty guidelines, which are a simplified version of the federal poverty thresholds issued each year by the Department of Health and Human Services (HHS).
- **Low-Income Population** shall mean any readily identifiable group of Low-Income Customers who live in geographic proximity.
- **Major Service Change** shall mean a change or changes in any route other than a subsidized route extension, an experimental route, or an express transfer service route that either changes the number of service hours operated on a route by 25% or more; OR changes the length of the route structure by 25% or more. Route structure refers to the length of a route based on map coverage rather than based on vehicle miles.
- **Minority Customers** shall mean RTS customers identifying as any of the groups identified through the RTS fixed route customer surveys or citing a place other than the United States as nation of origin. The groups include Black or African American, Asian, American Indian/Alaskan Native, Hispanic or Latino or Spanish, or Middle Eastern.
- **Minority Customer Routes** shall mean those RTS routes that have at least one-third of the revenue miles located in Census block groups where the minority population percentage exceeds the average minority population percentage in the service area. RGRTA may adjust this classification if route-specific ridership data shows that ridership characteristics do not reflect the characteristics of the census blocks through which the route travels.
- **Minority Population** shall mean any readily identifiable group of "minority customers" who live in geographic proximity.
- **Route Extension** shall mean a spur off the trunk line of a route designed to transport customers to a specific





## TITLE VI PROGRAM POLICIES FOR SERVICE CHANGES & SERVICE MONITORING ON RTS FIXED ROUTES 2023 -2026

### BOARD APPROVED POLICY

location not serviced by the trunk line. A route extension may or may not be created through a subsidy agreement with a strategic business partner.

- **RTS Connect:** shall mean the customer facing brand name for the fixed route bus service RTS provides in Monroe County.
- **RTS On Demand:** shall mean the customer facing brand name for the demand responsive transit service RTS provides in Monroe County in specific geographic locations designated as On Demand Zones.

### 3.0 Major Service Change Policy

Major Service Change shall mean a change or changes in any RTS fixed route other than a subsidized route extension, an experimental route, or an express transfer service route that either changes the number of service hours operated on a route by 25% or more; OR changes the length of the route structure by 25% or more. Route structure refers to the section out of a route based on map coverage rather than based on vehicle miles.

All Major Service Changes and fare changes to RTS fixed routes are subject to a Title VI Equity Analysis prior to approval by the RGRTA Board of Commissioners.

1. The Title VI Equity Analysis shall evaluate Disparate Impact, Disproportionate Burden, Level of Service, and Quality of Service for affected RTS fixed routes.
2. The Title VI Equity Analysis completed for a Major Service Change or fare change must be presented to the RGRTA Board of Commissioners and included in the RGRTA Title VI Program Plan with a record of action taken by the Board.

### 4.0 Title VI Equity Analyses

#### 4.1. Disparate Impact Policy

Any time a Major Service Change or fare change to one or more RTS fixed routes poses a difference in Adverse Effect on Minority Customers versus non-minority customers greater than  $\pm 20\%$  above or below the system average for Minority Customers, the change shall be deemed to have a Disparate Impact.

The 20% threshold shall be based on analyses of RTS customer demographic data and an evaluation of the standard deviation of the route level statistics as compared to the system average. RGRTA excludes subsidized routes from this policy, since RGRTA will not provide such service unless a third party will pay for the service.

In the event the proposed action has a negative impact that affects Minority Customers more than non-minority customers with a disparity that exceeds the adopted Disparate Impact Threshold, or that benefits non-minority customers more than Minority Customers with a disparity that exceeds the adopted Disparate Impact Threshold, RGRTA must evaluate whether there is an alternative that has a more equitable impact.

Otherwise, RGRTA must take measures to mitigate the impact of the proposed action on the affected Minority Customers and demonstrate that both a legitimate business purpose cannot otherwise be accomplished and that the proposed change is the least discriminatory alternative.

#### 4.1.A. Details about the Threshold

The threshold of 20% was arrived at by first identifying the percentage of wholly or partially minority customers utilizing each route in the system (during a one (1) year period, based on (4) quarterly surveys) and then comparing those values to the percentage of wholly or partially minority customers throughout the system. We observed the standard deviation of these variances. Statistical significance was deemed to be  $\alpha = 0.10$  for a 1-tail test (giving us a z-score of 1.282). The standard deviation of the observed variances was 15.7%, giving us a threshold percentage of  $\pm 20.1\%$ . For simplicity, we have standardized this to 20%.



## TITLE VI PROGRAM POLICIES FOR SERVICE CHANGES & SERVICE MONITORING ON RTS FIXED ROUTES 2023 -2026

### BOARD APPROVED POLICY

#### 4.2. Disproportionate Burden Policy

Any time a Major Service Change or fare change to one or more RTS fixed routes poses a difference in Adverse Effect on a Low-Income Population versus a non-low-income population of  $\pm 20\%$  above or below the system average for Low-Income Customers, it shall be deemed to have a Disproportionate Burden.

The 20% threshold shall be based on analyses of RTS customer demographic data and an evaluation of the standard deviation of the route level statistics as compared to the system average.

RGRTA excludes subsidized routes from this policy, since RGRTA will not provide such service unless a third party will pay for the service.

In the event the proposed action has a negative impact that affects Low-Income Customers more than non-low-income customers with a burden that exceeds the adopted Disproportionate Burden Threshold, or that benefits non-low-income customers more than Low-Income Customers with a burden that exceeds the adopted Disproportionate Burden Threshold, RGRTA must evaluate whether there is an alternative that has a more equitable impact.

Otherwise, RGRTA must take measures to mitigate the impact of the proposed action on the affected Low-Income Customers and demonstrate that a legitimate business purpose cannot otherwise be accomplished and that the proposed change is the least discriminatory alternative.

##### 4.2.A. Details about the Threshold

The threshold of 20% was arrived at by first identifying the percentage of customers with household incomes below \$15,000 annually utilizing each route in the system (during a one (1) year period, based on (4) quarterly surveys) and then comparing those values to the percentage of customers with household incomes below \$15,000 annually throughout the system. We observed the standard deviation of these variances. Statistical significance was deemed to be  $\alpha = 0.10$  for a 1-tail test (giving us a z-score of 1.282). The standard deviation of the observed variances was 15.3%, giving us a threshold percentage of  $\pm 19.6\%$ . For simplicity, we have standardized this to 20%.

#### 5.0 Title VI Service Monitoring

RGRTA shall monitor the performance of the Minority Customer routes versus non-minority customer routes within the RTS fixed route system, relative to the system-wide criteria defined for the level of service and quality of service on the fixed routes.

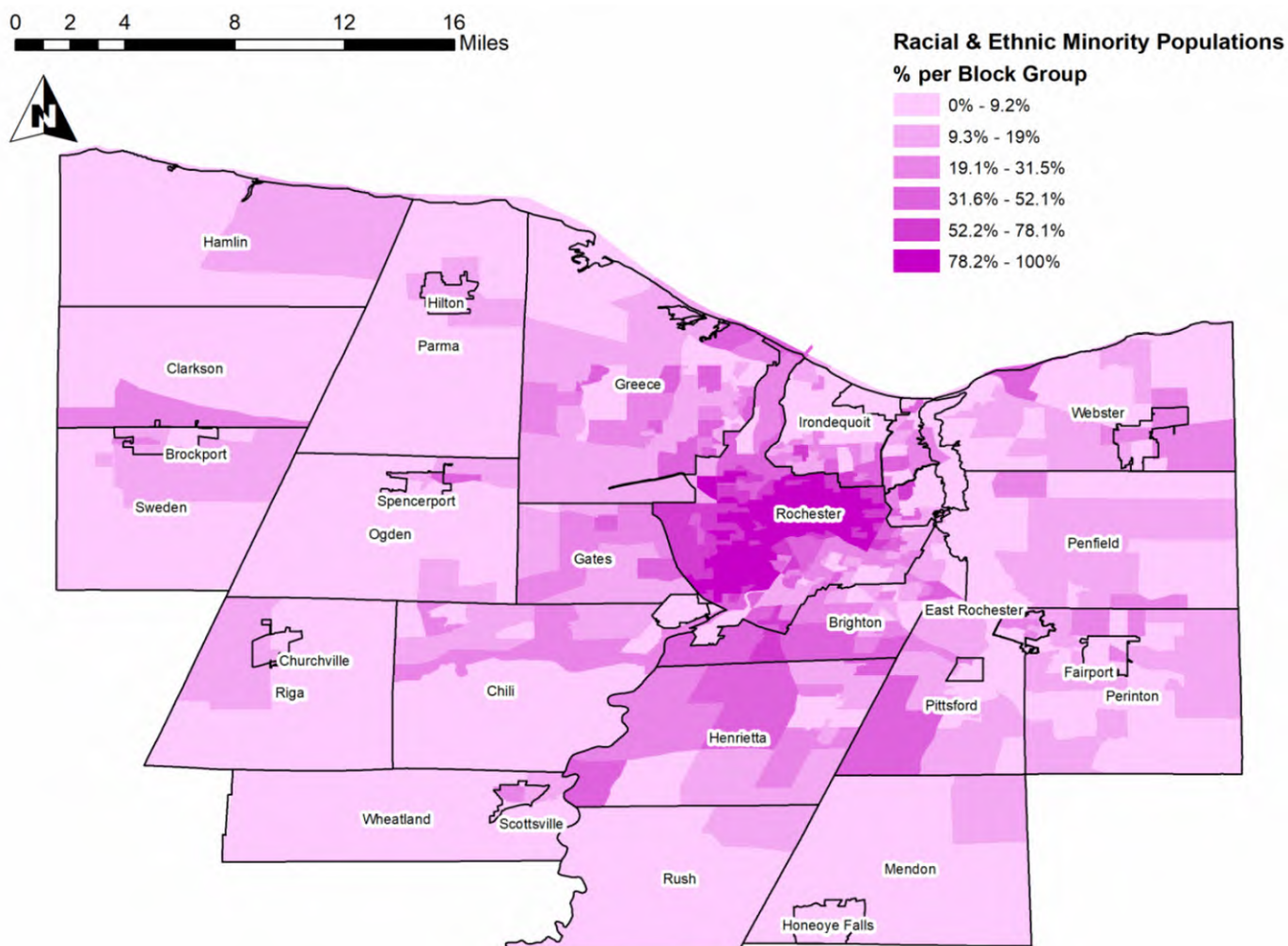
The history of the Rochester area includes the practice of redlining, which concentrated populations by African American, Foreign-born White, and Native-born White into geographic locations. The locations coded red and labeled "Hazardous" were in the city center and immediately surrounded by a second area coded yellow and labeled "Definitely Declining." A map of Rochester from 1935 with data from 1940 provides a visual representation. <https://dsl.richmond.edu/panorama/redlining/#loc=13/43.223/-77.61&city=rochester-ny>. As a result, the city center became, and remains, the area with the highest populations of people protected under Title VI according to race, color, and national origin. Additionally, the history of Rochester also includes the legacy of employers such as Eastman Kodak, Bausch and Lomb, and Xerox – all also located in the city center. The structuring of the RTS fixed bus routes originally served the populations both living and working in the city center, all in Census blocks where the minority population percentage exceeds the average minority population percentage in the service area. Due to this history, the **majority** of the fixed routes in the RTS system continue to qualify as Minority Customer Routes, even after the system was restructured during the Reimagine RTS project to create RTS Connect fixed route service. (This interactive RTS system map shows the structure as of September 2021

<http://www.google.com/maps/d/u/0/edit?mid=1ap3a4RNTDz4svoQ5PCvFnDTMU6M6fztC&usp=sharing>).

## TITLE VI PROGRAM POLICIES FOR SERVICE CHANGES & SERVICE MONITORING ON RTS FIXED ROUTES 2023 -2026

### BOARD APPROVED POLICY

Demographic data reveals that the Core of the service area continues to be where the populations who identify as racial and ethnic minorities are heavily concentrated.



*Distribution of percent of racial and ethnic minority populations per Census block group in Monroe County. Dataset from the US Census Bureau, Table B03002: Hispanic or Latino Origin by Race (ACS 2018 5-Year Estimates) data.census.gov, accessed April 21, 2020. Data for minority population was found in the "Hispanic or Latino Origin by Race" dataset from the US Census. All the categories of race and ethnicity except "Not Hispanic or Latino: white alone" were aggregated for each Census block group to find the total number of minority population.*

#### 5.1. Criteria for Level of Service

This section shall set forth the criteria designed to ensure the level of service on RTS fixed routes is comparable on Minority Customer Routes and non-minority customer routes.

##### 5.1.A. Vehicle Load

The load condition defines the minimum and maximum customer occupancy level for service operated by RTS. The load standard is expressed as a percentage of the number of customers compared to the vehicle seating capacity. Load conditions are defined individually for each of the route classifications in the system. Load calculations are based on aggregations of customer counts by half-hour period for Core Frequent and Local routes. Load calculations are based on the average of the maximum load for all trips in a given direction during a peak time period.



## TITLE VI PROGRAM POLICIES FOR SERVICE CHANGES & SERVICE MONITORING ON RTS FIXED ROUTES 2023 -2026

### BOARD APPROVED POLICY

RTS uses a service planning capacity of 120% of seated capacity on all routes while strictly abiding by the federal crush capacity of 150% of seated capacity. For routes identified as commuter service, based on the FTA definition, we strive to limit the load to 100% of seated capacity whenever it is operationally feasible. RTS will exclude vehicle loads less than 80% seated capacity because they will not trigger a disparity. In terms of monitoring the level of service, there is no disparity for vehicle load when the calculated percentage is *less than* 20% of the system average or 20% *below* the system average; as this simply shows there are fewer people on the buses and more empty seats.

#### 5.1.B. Headway

The frequency of service for each RTS route shall be determined by the ridership on each route, and the ability to meet other performance measures, such as on-time performance and pass-up frequency. Routes are required to meet a minimum headway to provide a convenient and effective service for customers.

	Weekdays		Weekends and Holidays	
	Early Morning 5 AM – 6 AM Evening 6 PM – Midnight	Daytime 6 AM – 6 PM	Early Morning 6 AM – 7 AM Evening 6 PM – Midnight	Daytime 7 AM – 6 PM
Core Frequent Network	30 minutes	15 minutes	60 minutes	30 minutes
Core Local Network	60 minutes	30 minutes	60 minutes	60 minutes
Suburban	120 minutes	120 minutes	120 minutes	120 minutes
Seasonal*	60 minutes	30 minutes	60 minutes	60 minutes
Crosstown	60 minutes	30 minutes	60 minutes	60 minutes
Commuter	6 Trips (maximum)	N/A	N/A	N/A

\*The Seasonal route is a Suburban service type with the same frequency as the Core Local Network.

The minimum headways established above are the minimum service levels only. The maximum headways shall be determined by the ridership and other performance measures. Routes that do not have sufficient ridership to sustain the minimum headway will be subject to route analysis and observation by the Planning Department, Scheduling Department, and the Service Development Committee. The redesigned service does not have traditional peak and off-peak periods. The closest conceptual “peak” service time is Daytime (6:00 AM to 6:00 PM). As a result, the Early Morning (5:00 AM to 6:00 AM or 6:00 AM to 7:00 AM) and Evening (6:00 PM to Midnight) periods would be equivalent to off-peak service times. The headway for each route shall be driven by these established service times.

Weekend and Holiday service runs Saturdays, Sundays, and major holidays (New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day). All other holidays shall operate on the normal schedule for that day of the week.

In very limited instances and with as much public notice as possible, changes/additions/revisions to these headway standards may be made to accommodate temporary operational requirements or special events.

#### 5.1.C. Service Availability

Access to the transit system is expressed in terms of the travel time required for a customer to get from his/her point of origin to the nearest bus stop. An individual is generally regarded to have good access to the transit system if the nearest stop is no more than 5 minutes travel time from the point of origin. RTS strives to employ a route structure such that 95% of all residents living in areas of urban density (greater than 3,600 persons per square mile) are afforded walk-on access to the bus and 95% of all residents of suburban areas are afforded automobile access to the bus.

In terms of distance, walk-on access is available to persons residing within ¼ mile of a bus route (5 minutes at 3 mph average walking speed). Auto access is available to persons living up to 2 ½ miles from a route (5 minutes at 30 mph average driving speed). In terms of bus stops, persons living in areas of urban density are afforded at least 4 bus stops per mile and persons living in suburban areas are afforded bus stops not more than 2 miles apart.





## TITLE VI PROGRAM POLICIES FOR SERVICE CHANGES & SERVICE MONITORING ON RTS FIXED ROUTES 2023 -2026

### BOARD APPROVED POLICY

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#### 5.1.D. On-Time Performance

RGRTA has established standards for on-time performance that will enable the Authority to maintain a reasonable, high-quality service. RGRTA's on-time performance indicator is designed to provide quality service and provides bus operators with realistic performance goals as defined in the most current Comprehensive Plan.

For the purposes of calculating on-time performance, a bus will be considered on time if the arrival time at a time point falls within a certain range of the scheduled time. RTS fixed route service currently uses the following range: *A bus will be considered on-time if it arrives at a time point between 2:00 (two minutes and zero seconds) early, and 5:00 (five minutes and zero seconds) of the scheduled arrival time.* If the arrival time at a time point falls outside of this range, the bus will then be considered late or early, depending on which side of the range it falls on.

RTS will strive to maintain reasonable on-time performance standards. The on-time performance range set forth in the Comprehensive Plan shall be considered a minimum only.

#### 5.2. Criteria for Quality of Service

This section shall set forth the criteria designed to ensure the quality of service on RTS fixed routes is comparable on Minority Customer Routes and non-minority customer routes.

**Note: The Authority considers On Time Performance as a measure of service quality. However, the FTA Circular 4702.1B identifies on time performance as a Service Policy requirement. As a result, on time performance appears in this document under Service Standards rather than under the Service Policies to monitor quality of service.**

#### 5.2.A. Distribution of RTS Amenities

RGRTA will allow and distribute amenities at selected bus stops and shelters throughout the RTS fixed route service area on an as-needed basis. Amenities may include ATIS signs, bus shelters, benches, trash bins, bike racks, map display, special lighting, or any items or services that would not normally be found at a typical bus stop.

ATIS signs are installed at bus stops where there is a minimum of 200 boardings per day, and shelters (including benches) are installed where there is a minimum of 50 boardings per day. Other amenities are installed on an as-needed basis and may be influenced by other factors such as business partner contributions, new development, and/or the level of other types of traffic. Existing shelters needing replacement will be replaced provided there is a minimum of 25 boardings per day and there have not been three or more incidents of vandalism with a six-month period.

RTS contracts the installation and maintenance of shelters. The Planning Department manages the location and upkeep of shelters and other amenities. This data is stored in a Bus Stop Manager Database and the Trapeze system. Amenities may be installed by entities other than RTS. In these cases, the entity that has purchased and installed those amenities shall be responsible for their upkeep and removal, should that become necessary. RTS shall assume no responsibility for such amenities.

The redesigned fixed route system places emphasis on network connections and an improvement in overall customer mobility. This includes both stronger connections between fixed routes and the integration of demand response service in the On Demand Zones with the core fixed-route transit network. To facilitate these various connections, RTS installed Connection Hubs throughout the service area at key network convergence points and outer network areas where customers may transfer between multiple fixed route routes or connect to demand responsive service to reach their destinations. Specific types of shelters and



## TITLE VI PROGRAM POLICIES FOR SERVICE CHANGES & SERVICE MONITORING ON RTS FIXED ROUTES 2023 -2026

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amenities are provided at the Connection Hubs.

#### 5.2.B. *Vehicle Assignment*

RTS buses are not assigned to specific communities within the RTS service area based on vehicle age or size but rather to serve specific blocks of work that call for them based on the needs of that block. Blocks can be associated with different routes. RTS fixed routes transfer in the RTS Transit Center, which allows the use of the same bus and/or Bus Operator on more than one route (interlining). Interlining has the effect of randomizing which bus make/year will drive the fixed routes during service. Many of the routes and runs serve multiple communities with diverse populations. Buses are distributed widely across the fixed route service area rather than assigned to specific routes. Given RTS's strict maintenance standards, age does not serve as a viable proxy for diminished quality. RTS bus assignments encompass the activities and procedures carried out in the Scheduling Department, Maintenance Department, and Operations Department.

RTS electric battery buses differ from diesel buses because they have distance/range constraints that vary according to the outside temperature and the capacity of the onboard ESS (Energy Storage System). As electric buses are added to the fleet, Scheduling and Maintenance will identify blocks that can support battery electric buses based on the number of miles and the anticipated temperatures during the period when a schedule will be in place ("pick"). The number of blocks identified for electric bus assignments will significantly exceed the number of available electric buses to ensure electric buses are deployed as broadly as possible within their range limitations.

1. **Scheduling Department:** After determining the service schedule, the Scheduling Department identifies desired bus categories for each block based on trip demands and the block's travel distance from the RTS property. This assignment happens in the Trapeze FX software and is limited to a simple statement of necessity; it does not include the actual assignment of a bus category, bus series, or bus number. A secondary Scheduling Department bus assignment process happens with the distribution of a Bus Assignment document via e-mail from the Maintenance Department. The Bus Assignment document is used to coordinate daily bus/block assignments.
2. **Maintenance Department:** Buses are grouped into the same bus categories used by the Scheduling Department. Buses are assigned to blocks throughout the day. Blocks that begin before approximately 1 PM (morning blocks) are assigned buses in the Maintenance Department by the Train Out group. Train Out utilizes the directives that come from the Scheduling Department to assign buses to blocks based on desired bus categories. When there are no buses in the block's desired bus category, available buses from other categories can be used based on priority. Additionally, there is an "Auto-Assign" feature in Trapeze Ops that will automatically assign buses to blocks following the same set of rules as the manual assignment process.
3. **Operations Department:** After approximately 8 AM (afternoon blocks), Dispatchers assign buses in the Operations Department using the same process as the Train Out group. Occasionally, Dispatchers and Garage Supervisors may alter the bus type assignments due to lack of availability.

#### 5.2.C. *RTS Fixed Route Service Types and Allocation*

Services are allocated as outlined below, with the concentration of transit service happening within the Rochester City limits. All service will be monitored at a route level for ridership, on-time performance, cost recovery, pass-ups, and maximum load. If any route does not meet standards for the service type, the schedule will be adjusted to improve that measure, or the route may be reworked, or as a last resort, the route may be eliminated.

1. **Core Routes:** The Core route network operates between the RTS Transit Center and one or more peripheral end points located in the City or in adjacent suburban towns having urban density





## TITLE VI PROGRAM POLICIES FOR SERVICE CHANGES & SERVICE MONITORING ON RTS FIXED ROUTES 2023 -2026

### BOARD APPROVED POLICY

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characteristics (greater than 3,600 persons per square mile). Core routes are characteristically full-service routes. They operate at high frequencies, generally provide all-day service, and operate on weekends. An urban route does not operate in express mode. Short Line trips provide increased frequency for part of a route with high ridership. Long Line Trips travel longer distances. There are four routes with this combination of Short Line and Long Line trips. Routes that either include a Short Line trip or have a structure that allows high frequency are in the Frequent Network. The Frequent Network has nine routes and one corridor. Routes in the Core tier also transport students to various schools in the urban core of Rochester, such as the Rochester City School district. These routes are referred to as Neighborhood District Service routes (NDS). NDS are regularly scheduled Core routes that are available to the public but are designed or modified to accommodate the needs of school students and personnel. Factors such as student enrollment can cause the number of schools and resulting number of NDS routes to fluctuate from year to year.

2. **Crosstown/Suburban:** Crosstown routes connect communities without traveling downtown. While these routes do not serve the RTS Transit Center, they do connect with routes that go to the RTS Transit Center. Suburban routes are fixed routes that serve a specific suburban area but do not serve the RTS Transit Center. A suburban fixed route may have reduced frequency due to lower demand than an urban fixed route.
3. **Commuter:** Commuter service means fixed route bus service, characterized by service that runs predominantly in one direction during peak periods, limited stops, and routes of extended length, usually between the central business district and outlying suburbs. The commuter service transports customers to Connection Hubs, where they can transfer to fixed route service. These routes will provide service for customers commuting to and from work during the morning and evening commute times between these suburban areas and Downtown Rochester.
4. **Subsidized:** Subsidized service is paid for by business partners with RTS to fill a specific transportation need for that business or institution. Subsidized service is open to the public. The total number of subsidized routes may vary over time.
5. **Experimental Routes:** Experimental routes are designated by RGRTA at the time of creation as being “experimental” if they are developed to test the viability of a new route structure. In no case will an “experimental” route remain experimental for more than 12 months.

## EXHIBITS

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# Exhibit 11: Demographic Data

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# Tables

Ridership Data by Each Fixed Route

Ridership Data by Stop Type on Weekdays, Saturdays, and Sundays (Travel Patterns)

Minority Census Tracts in RTS Fixed Route Service Area

Low-Income Census Tracts in RTS Fixed Route Service Area, 2023

	A	B	C	D	E	F	G
3	Average of ons			Week Starting	transit_date_time		
4				3/06/2023	3/13/2023	3/20/2023	3/27/2023
5	current_route_direction	start_time					
6	1	Inbound	5:15:00 AM	8.6	5.4	9.5	6
7	1	Inbound	5:35:00 AM	12	10.5	11.8	10.5
8	1	Inbound	6:25:00 AM	9.4	16.8	15	9
9	1	Inbound	6:55:00 AM	20.5	14.6	14.8	15
10	1	Inbound	7:25:00 AM	15.25	12.6	19.5	14.5
11	1	Inbound	7:55:00 AM	13.2	11.6	22.75	17
12	1	Inbound	8:25:00 AM	23.2	21	16.8	16
13	1	Inbound	8:55:00 AM	20.33333333	16.5	12.75	19.5
14	1	Inbound	9:25:00 AM	16.5	15.5	16.2	10.5
15	1	Inbound	9:55:00 AM	13.8	14.6	15.75	22
16	1	Inbound	10:25:00 AM	22.25	20.2	17.5	15
17	1	Inbound	10:55:00 AM	12.5	21.8	16	24
18	1	Inbound	11:25:00 AM	19.6	15	19	14.5
19	1	Inbound	11:55:00 AM	51	44.5	43.8	38
20	1	Inbound	12:25:00 PM	24	18.8	21.2	18
21	1	Inbound	12:55:00 PM	12.2	12.4	17.5	20
22	1	Inbound	1:25:00 PM	17	13	19.33333333	
23	1	Inbound	1:55:00 PM			22.6	21.5
24	1	Inbound	2:25:00 PM	15.75	20.5	24.6	31.5
25	1	Inbound	2:55:00 PM	19	24.2	35.5	23.5
26	1	Inbound	3:25:00 PM	29.8	30.5	30.2	30.5
27	1	Inbound	3:55:00 PM	13	15.4	14.6	12.5
28	1	Inbound	4:25:00 PM	9.33333333	12.5	13.6	14
29	1	Inbound	4:55:00 PM	11	11.75	58.2	11
30	1	Inbound	5:25:00 PM	8.4	6.75	10.75	4
31	1	Inbound	5:55:00 PM	10.25	7.25	13.4	7
32	1	Inbound	6:25:00 PM	8	7	6.4	6.5
33	1	Inbound	7:25:00 PM	12.75	12	12.25	9.5
34	1	Inbound	8:25:00 PM	5	8.5	8.4	11
35	1	Inbound	9:25:00 PM	3.25	7.25	2.6	4.5
36	1	Inbound	11:25:00 PM	2.75	4.2	4.5	12
37	1	Inbound	10:25:00 PM	1	2	3.25	4.5
38	1	Outbound	5:15:00 AM	1.2	0.666666667	1.6	2
39	1	Outbound	6:00:00 AM	2.6	4	4	7
40	1	Outbound	6:30:00 AM	2	2.8	3.2	1
41	1	Outbound	7:00:00 AM	3.25	5.2	5.25	4.5
42	1	Outbound	7:30:00 AM	14.25	15	12.2	6.5
43	1	Outbound	8:00:00 AM	14.5	5	11.2	9
44	1	Outbound	8:30:00 AM	27	21.5	20.4	18
45	1	Outbound	9:00:00 AM	37	43.5	32.6	42
46	1	Outbound	9:30:00 AM	23.8	26.2	24.6	20
47	1	Outbound	10:00:00 AM	22.75	18	24.25	20
48	1	Outbound	10:30:00 AM	7.5	14.8	16.8	13
49	1	Outbound	11:00:00 AM	19.4	16	19.2	17.5
50	1	Outbound	11:30:00 AM	10.5	9.75	7.8	9
51	1	Outbound	12:00:00 PM	17.75	11.8	18.2	17
52	1	Outbound	12:30:00 PM	16.5	18.8	17	21
53	1	Outbound	1:00:00 PM	11	11	13.66666667	
54	1	Outbound	1:30:00 PM			17.8	11.5
55	1	Outbound	2:00:00 PM	12	19.75	18.2	22.5
56	1	Outbound	2:30:00 PM	11	11.2	16	14
57	1	Outbound	3:00:00 PM	16.4	15.25	19	20

	A	B	C	D	E	F	G
3	Average of ons			Week Starting	transit_date_time		
4				3/06/2023	3/13/2023	3/20/2023	3/27/2023
5	current_route_direction	start_time					
58	1	Outbound	3:30:00 PM	16.75	18.6	18.2	27.5
59	1	Outbound	4:00:00 PM	17.66666667	14	17.2	12
60	1	Outbound	4:30:00 PM	16	14.25	20.6	19
61	1	Outbound	5:00:00 PM	14.8	12.5	26	10
62	1	Outbound	5:30:00 PM	12	14.75	9.4	10
63	1	Outbound	6:00:00 PM	11.25	11	8	16
64	1	Outbound	7:00:00 PM	13.75	18.75	21.25	19.5
65	1	Outbound	8:00:00 PM	8.8	10.75	14.6	21
66	1	Outbound	10:00:00 PM	6	6.6	8.5	8
67	1	Outbound	9:00:00 PM	7.5	12	8.4	8
68	1	Outbound	12:00:00 AM	4.6	6.4	6	7
69	1	Outbound	11:00:00 PM	9.75	10.4	7.75	5
70	3	Inbound	5:27:00 AM	11.2	10.2	8.4	9.5
71	3	Inbound	5:57:00 AM	13.5	11.75	12.6	10
72	3	Inbound	6:27:00 AM	12.2	9.8	12.4	13
73	3	Inbound	7:57:00 AM	27.2	19	18	21.5
74	3	Inbound	8:27:00 AM	26.4	20.6	24.25	15
75	3	Inbound	9:27:00 AM	14.5	14.4	19.5	13.5
76	3	Inbound	10:27:00 AM	25.2	19.4	18.4	18.5
77	3	Inbound	10:57:00 AM	24.2	18.6	26.5	23
78	3	Inbound	11:27:00 AM	12.75	13.25	19.6	18
79	3	Inbound	11:57:00 AM	19.6	14.8	20.8	14
80	3	Inbound	12:57:00 PM	23.6	19.25	17.4	18.5
81	3	Inbound	1:57:00 PM	22.5	19.4	21.4	14
82	3	Inbound	2:27:00 PM	15.5	16.2	22.75	15.5
83	3	Inbound	2:57:00 PM	21.75	15.5	17.2	112
84	3	Inbound	3:27:00 PM	23.33333333	14	18.33333333	
85	3	Inbound	3:57:00 PM	25.2	26.4	29.2	16
86	3	Inbound	4:27:00 PM	18.75	24.6	22	20
87	3	Inbound	4:57:00 PM	15.5	19.2	18.5	17
88	3	Inbound	5:57:00 PM	13.8	12.4	15.5	16
89	3	Inbound	6:57:00 PM	7.75	10.4	11.2	12
90	3	Inbound	8:27:00 PM	8	12.5	10.5	7
91	3	Inbound	9:57:00 PM	6.333333333	5.75	9.2	4
92	3	Inbound	7:27:00 AM	19	22	21	18
93	3	Inbound	8:57:00 AM	15.8	19	26	
94	3	Inbound	8:57:00 PM	6.666666667	6.5	5.8	6.5
95	3	Inbound	6:57:00 AM	20	19.2	26.4	31
96	3	Inbound	9:57:00 AM	21.8	19.5	17.6	19
97	3	Inbound	12:27:00 PM	22.75	27.75	25.25	19
98	3	Inbound	1:27:00 PM	15.66666667	22.6	32.5	12.5
99	3	Inbound	5:27:00 PM	13.8	10	13	12
100	3	Inbound	6:27:00 PM	8.25	9	8.75	8.5
101	3	Inbound	7:27:00 PM	9.6	8.6	9	16
102	3	Inbound	9:27:00 PM	6	8.666666667	10	12
103	3	Inbound	10:27:00 PM	4.2	4	4.4	3.5
104	3	Inbound	10:57:00 PM	4.5	3.5	3.75	1
105	3	Inbound	11:27:00 PM	3.6	4.333333333	1	3
106	3	Inbound	7:57:00 PM	7	12.25	11.6	12.5
107	3	Outbound	5:30:00 AM	1.75	1.6	1	1.5
108	3	Outbound	6:00:00 AM	5	4.4	6.2	8
109	3	Outbound	6:30:00 AM	10	7.2	8	6



	A	B	C	D	E	F	G
3	Average of ons			Week Starting	transit_date_time		
4				3/06/2023	3/13/2023	3/20/2023	3/27/2023
5	current_route_direction	start_time					
110	3	Outbound	7:00:00 AM	9.25	7.5	8.6	10
111	3	Outbound	7:30:00 AM	8.6	7.2	3.5	11
112	3	Outbound	8:00:00 AM	8.6	5.4	9.25	5.5
113	3	Outbound	8:30:00 AM	17.8	10.6	8.75	
114	3	Outbound	9:00:00 AM	17.25	15.6	17.75	15.5
115	3	Outbound	9:30:00 AM	19	19	18.2	16.5
116	3	Outbound	10:00:00 AM	15.6	12.6	11.2	20
117	3	Outbound	10:30:00 AM	9.6	15.8	15.5	18
118	3	Outbound	11:00:00 AM	18	16.75	16.8	18
119	3	Outbound	11:30:00 AM	20	17	15	16
120	3	Outbound	12:00:00 PM	15.75	17.25	22	13.5
121	3	Outbound	12:30:00 PM	15.4	24.75	17.4	14.5
122	3	Outbound	1:00:00 PM	22	12.4	16.25	16.5
123	3	Outbound	1:30:00 PM	12.5	20	26	21
124	3	Outbound	2:00:00 PM	18	21.8	19	26
125	3	Outbound	2:30:00 PM	30	19.5	24.4	25
126	3	Outbound	3:00:00 PM	28.66666667	20	25	
127	3	Outbound	3:30:00 PM	24	28.2	27.4	30.5
128	3	Outbound	4:00:00 PM	21.75	28.6	31	15.5
129	3	Outbound	4:30:00 PM	26.25	21.6	28.25	29.5
130	3	Outbound	5:00:00 PM	16.2	18.33333333	9	19
131	3	Outbound	5:30:00 PM	13.6	18	17.5	16
132	3	Outbound	6:00:00 PM	22.25	21.75	16	23.5
133	3	Outbound	6:30:00 PM	8	11.8	14.8	8.5
134	3	Outbound	7:00:00 PM	16.2	19.8	16	15
135	3	Outbound	7:30:00 PM	12.33333333	14	11.8	12
136	3	Outbound	8:00:00 PM	15	14.66666667	13.25	12
137	3	Outbound	8:30:00 PM	3.666666667	4	5.4	8.5
138	3	Outbound	10:00:00 PM	11.4	11.5	10.6	10
139	3	Outbound	10:30:00 PM	4.75	4.6	6.5	8.5
140	3	Outbound	9:00:00 PM	12	13	17.66666667	11
141	3	Outbound	11:30:00 PM	3	5.25	5	5
142	3	Outbound	12:00:00 AM	4.2	8	10.33333333	
143	3	Outbound	11:00:00 PM	5	8	10	5
144	3	Outbound	9:30:00 PM	11	7.25	6.4	13
145	4	Inbound	5:27:00 AM	10.2	14	10.4	10
146	4	Inbound	5:57:00 AM	10.75	8.8	12.4	8.5
147	4	Inbound	6:27:00 AM	10.8	10.4	15.6	12.5
148	4	Inbound	6:55:00 AM		8		
149	4	Inbound	7:57:00 AM	16	17	15.6	26.5
150	4	Inbound	8:27:00 AM	14.75	19.66666667	15.6	22
151	4	Inbound	9:27:00 AM	19	17	19.8	22
152	4	Inbound	10:27:00 AM	21	9	16	
153	4	Inbound	10:57:00 AM	19.4	19.4	16.5	8
154	4	Inbound	11:27:00 AM	16.75	20	17.4	48
155	4	Inbound	11:57:00 AM	19.75	16	19.6	14
156	4	Inbound	12:57:00 PM	18.8	19.6	15	15
157	4	Inbound	1:57:00 PM	19.4	20.6	22.4	28
158	4	Inbound	2:27:00 PM	38.33333333	27	19.25	14
159	4	Inbound	2:57:00 PM	23.6	32.25	34.6	23.5
160	4	Inbound	3:27:00 PM	18	17.6	20.75	33
161	4	Inbound	3:57:00 PM	21.33333333	29.5	18.75	16

	A	B	C	D	E	F	G
3	Average of ons			Week Starting	transit_date_time		
4				3/06/2023	3/13/2023	3/20/2023	3/27/2023
5	current_route	direction	start_time				
162	4	Inbound	4:27:00 PM	18.8	27.2	25.5	10
163	4	Inbound	4:57:00 PM	14.75	30	13.75	17
164	4	Inbound	5:57:00 PM	7.5	17.66666667	20.25	21.5
165	4	Inbound	6:57:00 PM	7	6.8	8	5
166	4	Inbound	8:27:00 PM	8	7.75	6.8	10
167	4	Inbound	9:18:00 PM			2	
168	4	Inbound	9:57:00 PM	5	5.4	4.8	2.5
169	4	Inbound	7:27:00 AM	19.8	15.8	17.5	13.5
170	4	Inbound	8:57:00 AM	15.2	17.8	17.8	29
171	4	Inbound	8:57:00 PM	14.6	11.6	7	13
172	4	Inbound	6:57:00 AM	19.6	17.2	18.8	15
173	4	Inbound	9:57:00 AM	17.75	14	12.6	23
174	4	Inbound	12:27:00 PM	20	19.75	22.6	21
175	4	Inbound	1:27:00 PM	23	19	22.25	17
176	4	Inbound	5:27:00 PM	15.2	18.8	22.25	14
177	4	Inbound	6:27:00 PM	6.5	7	10	11
178	4	Inbound	7:27:00 PM	8.5	8.6	15.5	12
179	4	Inbound	9:27:00 PM	6	5.4	8.5	8
180	4	Inbound	10:27:00 PM	4.5	3.6	3.6	6.5
181	4	Inbound	10:57:00 PM	2	1.333333333	1.5	5
182	4	Inbound	11:27:00 PM	4	3.5	2.5	4
183	4	Inbound	7:57:00 PM	7	6	8	6
184	4	Outbound	5:00:00 AM	2.6	2.25	1.5	1.5
185	4	Outbound	5:30:00 AM	2	3.2	2.2	1
186	4	Outbound	6:00:00 AM	5.6	8.4	3.6	0.5
187	4	Outbound	6:30:00 AM	6.5	8	5.2	8
188	4	Outbound	7:00:00 AM	12.8	11	11	13
189	4	Outbound	7:30:00 AM	16.8	12.6	12.25	11
190	4	Outbound	8:00:00 AM	16.2	12.4	16.4	6
191	4	Outbound	8:30:00 AM	18	15.4	11.25	16
192	4	Outbound	9:00:00 AM	25.66666667	12.5	17.4	20
193	4	Outbound	9:30:00 AM	24.25	17.6	20.6	22
194	4	Outbound	10:00:00 AM	22	20	15	
195	4	Outbound	10:30:00 AM	11.4	12.6	11.25	14
196	4	Outbound	11:00:00 AM	21	21	20.8	1
197	4	Outbound	11:30:00 AM	14	15.8	16.4	18
198	4	Outbound	12:00:00 PM	19.8	16.5	13.5	14
199	4	Outbound	12:30:00 PM	18.6	16.6	19.33333333	25.5
200	4	Outbound	1:00:00 PM	23.8	22	21.75	18.5
201	4	Outbound	1:30:00 PM	22.2	19.2	25.6	27
202	4	Outbound	2:00:00 PM	19.66666667	11.5	19	10
203	4	Outbound	2:30:00 PM	21	23	22	18
204	4	Outbound	3:00:00 PM	25	23.8	27.5	26
205	4	Outbound	3:30:00 PM	18.75	25.5	28.25	3
206	4	Outbound	4:00:00 PM	9	18.5	29.5	23
207	4	Outbound	4:30:00 PM	18.5	19.8	19.25	22
208	4	Outbound	5:00:00 PM	15.2	13.6	15.5	22
209	4	Outbound	5:30:00 PM	15.25	12	16.75	19.5
210	4	Outbound	6:00:00 PM	14.25	17.4	14.8	16
211	4	Outbound	6:30:00 PM	11.5	13.4	14.5	19
212	4	Outbound	7:00:00 PM	12.25	14	14	13
213	4	Outbound	7:30:00 PM	8.2	8	8.5	8.5

	A	B	C	D	E	F	G
3	Average of ons			Week Starting	transit_date_time		
4				3/06/2023	3/13/2023	3/20/2023	3/27/2023
5	current_route	direction	start_time				
214	4	Outbound	8:00:00 PM	6.2	12.25	7.6	10
215	4	Outbound	8:30:00 PM	6.4	7	8.8	5
216	4	Outbound	10:00:00 PM	6	7.2	6.2	5
217	4	Outbound	10:30:00 PM	6.666666667	5	4.2	3.5
218	4	Outbound	9:00:00 PM	6.25	7.6	7.75	7
219	4	Outbound	11:30:00 PM	3.333333333	5.333333333	4	4
220	4	Outbound	12:00:00 AM	4.6	6.25	8.25	6
221	4	Outbound	11:00:00 PM	4.6	4.75	4.5	7
222	4	Outbound	9:30:00 PM	4	6	5.5	6.5
223	6	Inbound	5:00:00 AM	5.8	6.2	7.5	6
224	6	Inbound	5:27:00 AM	19.25	14.2	15.5	17
225	6	Inbound	6:27:00 AM	24.6	18.2	18.4	16
226	6	Inbound	6:55:00 AM	15	12.6	15.8	14
227	6	Inbound	7:28:00 AM	18	8.6	16	10
228	6	Inbound	8:27:00 AM	14.2	11.5	13.8	23
229	6	Inbound	9:27:00 AM	16.4	14.6	17.4	20.5
230	6	Inbound	10:27:00 AM	14.2	20.8	22.6	10
231	6	Inbound	10:57:00 AM			17.75	19
232	6	Inbound	11:27:00 AM	9	10.75	11.8	14.5
233	6	Inbound	11:57:00 AM	23.6	13.8	13.33333333	22
234	6	Inbound	12:57:00 PM	21.5	18.6	15.6	14.5
235	6	Inbound	1:57:00 PM	16	13.2	12.25	17
236	6	Inbound	2:27:00 PM	13.5	24.8	15	14.5
237	6	Inbound	2:55:00 PM	12.66666667	13.25	15.4	16
238	6	Inbound	3:27:00 PM	30	18.25	16.5	9
239	6	Inbound	3:57:00 PM	13.25	10.25	12	
240	6	Inbound	4:04:00 PM			31	
241	6	Inbound	4:27:00 PM	17.6	13	15.25	7
242	6	Inbound	4:57:00 PM	5	15.66666667	12.6	6
243	6	Inbound	5:57:00 PM	7.25	8	9.75	13
244	6	Inbound	8:27:00 PM	5.25	6.4	8.6	7.5
245	6	Inbound	8:57:00 AM	14.8	8.4	15.2	18
246	6	Inbound	9:57:00 AM	118.25	117.8	16.8	16
247	6	Inbound	12:27:00 PM	13.6	12	14.8	10
248	6	Inbound	1:27:00 PM	12.2	13	16.2	11
249	6	Inbound	5:27:00 PM	17.4	10.2	10.8	12.5
250	6	Inbound	6:27:00 PM	7.4	8.666666667	7.666666667	11
251	6	Inbound	7:27:00 PM	8.8	10.4	11	9
252	6	Inbound	9:27:00 PM	7.4	6.8	4	6.5
253	6	Inbound	10:27:00 PM	6.2	7.25	3.6	1
254	6	Inbound	11:27:00 PM	5.4	5.6	4.75	4.5
255	6	Inbound	7:58:00 AM	18.4	14.2	15.8	13
256	6	Outbound	5:00:00 AM	2.5	1.2	2.25	1
257	6	Outbound	6:00:00 AM	3.6	3.4	4.6	3
258	6	Outbound	6:30:00 AM	4.2	5	6	5
259	6	Outbound	7:00:00 AM	12.66666667	12.6	13.8	17
260	6	Outbound	7:30:00 AM	12.6	11	13.8	12
261	6	Outbound	8:00:00 AM	11	7	11.75	8.5
262	6	Outbound	8:30:00 AM	12.66666667	8	8.6	10.5
263	6	Outbound	9:00:00 AM	13.6	10	10.75	17.5
264	6	Outbound	9:30:00 AM	14.8	7.2	12.2	5
265	6	Outbound	10:00:00 AM	3.8	6.6	9.2	7

	A	B	C	D	E	F	G
3	Average of ons			Week Starting	transit_date_time		
4				3/06/2023	3/13/2023	3/20/2023	3/27/2023
5	current_route_direction	start_time					
266	6	Outbound	10:30:00 AM	17	2	15.8	7.5
267	6	Outbound	11:00:00 AM	9	9.75	6.8	10.5
268	6	Outbound	11:30:00 AM	11.4	7.4	10.33333333	14.5
269	6	Outbound	12:00:00 PM	8.4	10.4	13.8	14.5
270	6	Outbound	12:30:00 PM	14	14	11.2	19.5
271	6	Outbound	1:00:00 PM	14.2	11	13	11
272	6	Outbound	1:30:00 PM	9.8	9.8	8.5	11
273	6	Outbound	2:00:00 PM	13.5	14.2	11	12
274	6	Outbound	2:30:00 PM	14.66666667	12.25	14.6	16
275	6	Outbound	3:00:00 PM	16.25	13.25	19.5	24.5
276	6	Outbound	3:30:00 PM	17.5	19	15	
277	6	Outbound	4:00:00 PM	21	13.33333333	21	17
278	6	Outbound	4:30:00 PM	28.33333333	20	15.2	22
279	6	Outbound	5:00:00 PM	19.6	10.2	14.8	11.5
280	6	Outbound	5:30:00 PM	14	13.6	19.25	14.5
281	6	Outbound	6:00:00 PM	12	11.4	10.25	14
282	6	Outbound	7:00:00 PM	11	12.8	13.6	9.5
283	6	Outbound	8:00:00 PM	8.75	10.8	12	5.5
284	6	Outbound	10:00:00 PM	5.4	6.75	8	13
285	6	Outbound	9:00:00 PM	6	10	11.5	7.5
286	6	Outbound	12:00:00 AM	4.2	7.75	5.75	5.5
287	6	Outbound	11:00:00 PM	6.4	6.25	5.66666667	7
288	8	Inbound	5:00:00 AM	4	3	4.25	4.5
289	8	Inbound	5:27:00 AM	11.25	10.2	10	9
290	8	Inbound	5:57:00 AM	8.25	9.4	13.8	18
291	8	Inbound	6:27:00 AM	13	12.6	13.4	19
292	8	Inbound	6:42:00 AM	9.25	8.4	8.6	5
293	8	Inbound	7:42:00 AM	7.2	7.2	6.2	7
294	8	Inbound	7:57:00 AM	10	7	9.6	11.5
295	8	Inbound	8:27:00 AM	16	11.8	16.25	18
296	8	Inbound	8:42:00 AM	6.8	9.4	6.66666667	7
297	8	Inbound	9:12:00 AM	10.2	8.4	10.6	40
298	8	Inbound	9:27:00 AM	18.8	22.25	18.8	15
299	8	Inbound	10:12:00 AM	13.25	11	18	17.5
300	8	Inbound	10:27:00 AM	11.6	11.5	8.25	11.5
301	8	Inbound	10:40:00 AM	6.5	13.5	5.4	8
302	8	Inbound	10:57:00 AM	8.8	17.6	17.6	23
303	8	Inbound	11:10:00 AM	6.4	7	4.25	8
304	8	Inbound	11:27:00 AM	9.2	10.2	10.5	11
305	8	Inbound	11:40:00 AM	5.2	6.2	4.6	5.5
306	8	Inbound	11:57:00 AM			7.2	8.5
307	8	Inbound	12:10:00 PM	5	4	3.66666667	
308	8	Inbound	12:40:00 PM	5	5.25	8.4	8.5
309	8	Inbound	12:57:00 PM	7.8	8.4	9.75	12.5
310	8	Inbound	1:10:00 PM	8.4	9.2	9.6	9
311	8	Inbound	1:40:00 PM	7.33333333	8.2	12	6.5
312	8	Inbound	1:57:00 PM	14.66666667	13.4	18.4	13
313	8	Inbound	2:10:00 PM	7.75	5.6	30.8	16.5
314	8	Inbound	2:27:00 PM	10.8	12	12.5	7
315	8	Inbound	2:40:00 PM	9.25	13.8	15.5	11
316	8	Inbound	2:57:00 PM	13.2	10.8	30.5	12
317	8	Inbound	3:12:00 PM	13.4	7.33333333	9.5	11.5

	A	B	C	D	E	F	G
3	Average of ons			Week Starting	transit_date_time		
4				3/06/2023	3/13/2023	3/20/2023	3/27/2023
5	current_route_direction	start_time					
318	8	Inbound	3:27:00 PM	12.75	15.8	16	27.5
319	8	Inbound	3:40:00 PM	15.75	16	14.2	16
320	8	Inbound	3:57:00 PM	26	13	15	14.5
321	8	Inbound	4:10:00 PM	10.8	9.2	10.75	7.5
322	8	Inbound	4:27:00 PM	12	15.8	14	14.5
323	8	Inbound	4:40:00 PM	11	8.6	8.5	15
324	8	Inbound	4:57:00 PM	11.25	15.75	14.6	
325	8	Inbound	5:10:00 PM	14	7.2	8	12
326	8	Inbound	5:42:00 PM	5.25	12.2	9.6	7
327	8	Inbound	5:57:00 PM	4.5	9.333333333	18.2	30
328	8	Inbound	6:12:00 PM	5.666666667	7	11.4	9.5
329	8	Inbound	6:57:00 PM	7.4	11.25	8.5	6
330	8	Inbound	8:27:00 PM	6.4	9.8	6.5	8
331	8	Inbound	9:57:00 PM	2	2.6	3	1
332	8	Inbound	7:27:00 AM	9.8	7.2	8.4	14.5
333	8	Inbound	8:57:00 AM	21.6	10.4	15.5	16.5
334	8	Inbound	8:57:00 PM	4.25	6.4	4.6	1
335	8	Inbound	8:12:00 AM	6.5	11.2	5.6	6.5
336	8	Inbound	6:57:00 AM	6.2	4.4	8.5	8
337	8	Inbound	9:57:00 AM	9	11.8	12.4	15
338	8	Inbound	12:27:00 PM	11.2	15.5	15.8	17
339	8	Inbound	1:27:00 PM	12.8	11.2	18.2	7.5
340	8	Inbound	5:27:00 PM	9.8	13	16.25	18
341	8	Inbound	6:27:00 PM	12.2	16.2	13.2	24.5
342	8	Inbound	7:27:00 PM	5.4	9.6	7	4.5
343	8	Inbound	9:27:00 PM	6.4	5.4	7	3
344	8	Inbound	10:27:00 PM	7.6	6	3.5	6
345	8	Inbound	10:57:00 PM	0	1.25	1.6	0.5
346	8	Inbound	11:27:00 PM	3	3	2	0.5
347	8	Inbound	7:57:00 PM	4.8	6.6	4.6	7
348	8	Inbound	7:12:00 AM	7	5.25	4	3
349	8	Inbound	9:42:00 AM	7.25	7.4	8.2	4
350	8	Outbound	5:30:00 AM	3.25	4.2	1.6	0
351	8	Outbound	6:00:00 AM	13	9.2	12.8	13
352	8	Outbound	6:15:00 AM	2	2	1.8	1
353	8	Outbound	6:30:00 AM	4	3.6	3.5	1
354	8	Outbound	6:45:00 AM	5	4.8	6.4	5
355	8	Outbound	7:00:00 AM	5.4	5.8	6.8	6
356	8	Outbound	7:15:00 AM	5.4	4.6	3.4	6
357	8	Outbound	7:30:00 AM	15.6	12.6	12.4	13.5
358	8	Outbound	7:45:00 AM	13.2	14.4	14.6	6
359	8	Outbound	8:00:00 AM	16.6	10.6	13.75	13
360	8	Outbound	8:15:00 AM	10	8.6	5.333333333	9.5
361	8	Outbound	8:30:00 AM	6.4	8.6	12	15
362	8	Outbound	8:45:00 AM	9.2	10.6	11.2	6
363	8	Outbound	9:00:00 AM	10	12.25	11	6.5
364	8	Outbound	9:15:00 AM	10.75	12	8.8	11
365	8	Outbound	9:30:00 AM	12	13	19.4	11.5
366	8	Outbound	9:45:00 AM	17.75	15.75	15	21.5
367	8	Outbound	10:00:00 AM	22.4	28.33333333	27.25	17
368	8	Outbound	10:15:00 AM	14.75	13	13	20
369	8	Outbound	10:30:00 AM	11.8	15	11.2	12.5

	A	B	C	D	E	F	G
3	Average of ons			Week Starting	transit_date_time		
4				3/06/2023	3/13/2023	3/20/2023	3/27/2023
5	current_route_direction	start_time					
370	8	Outbound	10:45:00 AM	10.8	13	16	8.5
371	8	Outbound	11:00:00 AM	10.8	5	28.4	20
372	8	Outbound	11:15:00 AM	7.2	6.8	8.6	3.5
373	8	Outbound	11:30:00 AM			5.75	7.5
374	8	Outbound	11:45:00 AM	6	5	3	
375	8	Outbound	12:00:00 PM	8.8	7.25	8	6
376	8	Outbound	12:15:00 PM	6.333333333	2.5	6.6	13.5
377	8	Outbound	12:30:00 PM	10	6.2	7.75	8
378	8	Outbound	12:45:00 PM	4.2	7.4	10.2	9.5
379	8	Outbound	1:00:00 PM	12.8	16	19.8	16
380	8	Outbound	1:15:00 PM	12.33333333	7.2	12.5	11.5
381	8	Outbound	1:30:00 PM	4	9.4	11.8	12.5
382	8	Outbound	1:45:00 PM	7.2	9.4	8.2	4
383	8	Outbound	2:00:00 PM	12.4	15.8	14	17.5
384	8	Outbound	2:15:00 PM	11.5	12.75	8.333333333	1
385	8	Outbound	2:30:00 PM	9.6	6.6	9.5	6.5
386	8	Outbound	2:45:00 PM	13.2	6.666666667	9.25	7.5
387	8	Outbound	3:00:00 PM	13	6.2	7.75	11.5
388	8	Outbound	3:15:00 PM	10	9.6	13.2	13
389	8	Outbound	3:30:00 PM	18.4	19	15.5	18.5
390	8	Outbound	3:45:00 PM	14.8	14.2	19.5	20
391	8	Outbound	4:00:00 PM	9.333333333	17.4	17.25	19
392	8	Outbound	4:15:00 PM	11.4	10.6	10	9
393	8	Outbound	4:30:00 PM	12	5.5	11.4	
394	8	Outbound	4:45:00 PM	11.2	8.2	8.8	13
395	8	Outbound	5:00:00 PM	15	14.666666667	8.5	20
396	8	Outbound	5:15:00 PM	4.25	7.6	7	12
397	8	Outbound	5:30:00 PM	13.5	11	11.8	14
398	8	Outbound	5:45:00 PM	8.666666667	7	9	2.5
399	8	Outbound	6:00:00 PM	12.5	11	11.4	9.5
400	8	Outbound	6:30:00 PM	16	14.25	13	11
401	8	Outbound	7:00:00 PM	9.8	4.4	16	8
402	8	Outbound	7:30:00 PM	11.6	11.4	7.4	6
403	8	Outbound	8:00:00 PM	9.2	8.6	9.25	11
404	8	Outbound	8:30:00 PM	13	10.4	9.2	8
405	8	Outbound	10:00:00 PM	5.6	5.4	6.25	8.5
406	8	Outbound	10:30:00 PM	7.333333333	11	8.2	10.5
407	8	Outbound	9:00:00 PM	7.6	6.6	9.5	7
408	8	Outbound	11:30:00 PM	5.333333333	8.4	5	9.5
409	8	Outbound	12:00:00 AM	33.5	4	1.75	4
410	8	Outbound	11:00:00 PM	9.4	5.25	5.5	6.5
411	8	Outbound	9:30:00 PM	7	7.75	10.75	10
412	9	Inbound	6:37:00 AM	13.5	10.5	10	11
413	9	Inbound	7:37:00 AM	5	10.33333333	7.6	7
414	9	Inbound	8:07:00 AM	7.6	9.75	7	6.5
415	9	Inbound	8:37:00 AM	7.4	6.6	11.75	9
416	9	Inbound	9:07:00 AM	6	6.2	4.4	7.5
417	9	Inbound	9:37:00 AM	6.4	3.75	7.8	4
418	9	Inbound	10:07:00 AM	4	5.5	5	3
419	9	Inbound	11:37:00 AM	9	5.25	3.5	3.5
420	9	Inbound	12:37:00 PM	14.33333333	8.6	8.5	9.5
421	9	Inbound	1:07:00 PM	11.25	7	3.8	3.5



	A	B	C	D	E	F	G
3	Average of ons			Week Starting	transit_date_time		
4				3/06/2023	3/13/2023	3/20/2023	3/27/2023
5	current_route_direction	start_time					
422	9	Inbound	1:37:00 PM	7.2	5.666666667	4.75	7.5
423	9	Inbound	2:07:00 PM	8.5	7	8.8	10
424	9	Inbound	2:37:00 PM	10.6	16.5	11	10.5
425	9	Inbound	3:12:00 PM	22.33333333	18	21	20.5
426	9	Inbound	4:07:00 PM	13	14.2	16	13
427	9	Inbound	5:37:00 PM	5.5	5.75	5.6	5.5
428	9	Inbound	6:07:00 PM	6	6.8	3.2	2
429	9	Inbound	6:57:00 PM	7.6	10.2	7.8	8
430	9	Inbound	9:57:00 PM	4	4	2.2	5
431	9	Inbound	8:57:00 PM	4.4	4.6	3.666666667	5.5
432	9	Inbound	10:57:00 PM	6	3.666666667	4	5.5
433	9	Inbound	7:57:00 PM	5	5.2	15.2	5
434	9	Inbound	5:37:00 AM	15.2	16.25	16.8	12
435	9	Inbound	7:07:00 AM	3.8	5	4.75	4.5
436	9	Inbound	10:37:00 AM	3.333333333	3.25	6.8	3.5
437	9	Inbound	11:07:00 AM	4.4	4	6	5
438	9	Inbound	12:07:00 PM	7.6	5.5	4.6	3.5
439	9	Inbound	4:37:00 PM	13.2	10.66666667	25.66666667	4
440	9	Inbound	5:07:00 PM	16.2	6.4	8.333333333	8.5
441	9	Inbound	3:37:00 PM	7.666666667	12	11.2	4
442	9	Inbound	3:42:00 PM			1	
443	9	Outbound	5:15:00 AM	1.2	1.25	2	1.5
444	9	Outbound	6:15:00 AM	13.2	14.8	12.75	16
445	9	Outbound	6:45:00 AM	37.6	29.8	38.5	37.5
446	9	Outbound	7:15:00 AM	13.8	11.2	10.4	16
447	9	Outbound	7:45:00 AM	11.6	10.5	12.4	5
448	9	Outbound	8:15:00 AM	6.333333333	14.25	14	10.5
449	9	Outbound	8:45:00 AM	9.2	12.2	10.2	12
450	9	Outbound	9:15:00 AM	6.6	7.5	4.2	3.5
451	9	Outbound	9:45:00 AM	8.666666667	7.75	8	6.5
452	9	Outbound	10:15:00 AM	2.2	3.4	4.4	1
453	9	Outbound	10:45:00 AM	10	9.4	10	9
454	9	Outbound	11:15:00 AM	7	5.75	6	5
455	9	Outbound	11:45:00 AM	5	7.75	3.6	5
456	9	Outbound	12:15:00 PM	5.333333333	4.6	6	2.5
457	9	Outbound	12:45:00 PM	6.75	7.4	5.8	4
458	9	Outbound	1:15:00 PM	9	3.333333333	6	4.5
459	9	Outbound	1:45:00 PM	9.5	12	7.6	11
460	9	Outbound	2:15:00 PM	6.8	7.75	7.4	6
461	9	Outbound	2:45:00 PM	9.4	10.33333333	6.666666667	4
462	9	Outbound	3:15:00 PM	11.33333333	13.5	10.4	8
463	9	Outbound	3:45:00 PM	11.75	8.4	7.5	10
464	9	Outbound	4:15:00 PM	8.2	8.8	9.4	9
465	9	Outbound	4:45:00 PM	8.8	9.4	10.66666667	8.5
466	9	Outbound	5:15:00 PM	14.75	4.75	7.6	12.5
467	9	Outbound	5:45:00 PM	5.75	5.8	5.6	2
468	9	Outbound	6:30:00 PM	10.66666667	8.6	6.2	16
469	9	Outbound	7:30:00 PM	3.75	7	6.2	7.5
470	9	Outbound	8:30:00 PM	8.75	5.6	6	8
471	9	Outbound	10:30:00 PM	6.6	7	5.25	7.5
472	9	Outbound	11:30:00 PM	4.6	3	2.8	2
473	9	Outbound	9:30:00 PM	5.4	4	3	6.5

	A	B	C	D	E	F	G
3	Average of ons			Week Starting	transit_date_time		
4				3/06/2023	3/13/2023	3/20/2023	3/27/2023
5	current_route_direction	start_time					
474	10	Inbound	5:28:00 AM	13.25	17	17	15
475	10	Inbound	6:28:00 AM	14	9.4	11.2	19
476	10	Inbound	6:58:00 AM	11.5	11.2	10	7
477	10	Inbound	7:28:00 AM	14.8	14.4	10.4	18
478	10	Inbound	8:28:00 AM	21	18	18.6	20.5
479	10	Inbound	8:58:00 AM	19.6	14.6	14.66666667	11.5
480	10	Inbound	9:28:00 AM	12	10	23.4	13
481	10	Inbound	9:58:00 AM	10.4	13	10.8	8
482	10	Inbound	10:28:00 AM	13.2	9	18.2	11
483	10	Inbound	10:58:00 AM	12	10.8	12.25	11.5
484	10	Inbound	11:28:00 AM	14.5	13.75	13.5	13.5
485	10	Inbound	12:28:00 PM	10	11	10	1
486	10	Inbound	12:58:00 PM	21.6	17.2	21	13
487	10	Inbound	1:28:00 PM	30.2	31.33333333	14	9
488	10	Inbound	1:58:00 PM	16.4	13.8	16.66666667	15
489	10	Inbound	2:28:00 PM	19	20.8	18.4	21
490	10	Inbound	2:58:00 PM	37.4	36.2	20	19
491	10	Inbound	3:58:00 PM	15.2	16.8	16.66666667	22
492	10	Inbound	4:28:00 PM	12.75	15.4	16.5	14
493	10	Inbound	4:58:00 PM	18.2	16.8	14.4	15
494	10	Inbound	5:28:00 PM	8.25	13.8	9.75	9.5
495	10	Inbound	5:58:00 PM	11.75	8.6	13	14
496	10	Inbound	6:28:00 PM	8.4	12	9.5	7
497	10	Inbound	8:28:00 PM	7.5	7.5	11	8
498	10	Inbound	3:28:00 PM	20.25	13	19	24.5
499	10	Inbound	7:28:00 PM	11	15.5	12	7.5
500	10	Inbound	7:58:00 AM	10.2	13.6	9.8	13
501	10	Inbound	11:58:00 AM	11.4	10.4	16	24
502	10	Inbound	10:28:00 PM	6.2	4	6.5	7
503	10	Inbound	11:28:00 PM	1.75	3.4	4	4
504	10	Inbound	9:28:00 PM	11.66666667	12.6	13	12
505	10	Outbound	6:00:00 AM	14.4	18.2	15.8	24
506	10	Outbound	6:30:00 AM	11.5	11.8	14.25	14
507	10	Outbound	7:00:00 AM	12.6	11	13.2	18
508	10	Outbound	7:30:00 AM	11.8	12	11.8	12.5
509	10	Outbound	8:00:00 AM	13.2	12.8	16	8.5
510	10	Outbound	8:30:00 AM	12.8	14.4	16	25
511	10	Outbound	9:00:00 AM	12.4	10.66666667	4.2	13
512	10	Outbound	9:30:00 AM	11	10.8	12.8	9
513	10	Outbound	10:00:00 AM	9.4	8.8	10.6	7.5
514	10	Outbound	10:30:00 AM	18.2	7.8	19.25	14.5
515	10	Outbound	11:00:00 AM	16	14.75	12.25	16.5
516	10	Outbound	11:30:00 AM	15.8	8.8	17.5	8
517	10	Outbound	12:00:00 PM	14	13.25	16.75	
518	10	Outbound	12:30:00 PM	17	22.5	15.2	21.5
519	10	Outbound	1:00:00 PM	15.25	11	6	10
520	10	Outbound	1:30:00 PM	16	14.4	20.33333333	18
521	10	Outbound	2:00:00 PM	10.8	11.2	8.6	14
522	10	Outbound	2:30:00 PM	15.8	14.6	18.8	20
523	10	Outbound	3:00:00 PM	10.5	12.6	14.25	12.5
524	10	Outbound	3:30:00 PM	18.8	18.4	20.33333333	17
525	10	Outbound	4:00:00 PM	16.25	18.2	16.25	14.5

	A	B	C	D	E	F	G
3	Average of ons			Week Starting	transit_date_time		
4				3/06/2023	3/13/2023	3/20/2023	3/27/2023
5	current_route_direction	start_time					
526	10	Outbound	4:30:00 PM	12.2	6.6	6	17
527	10	Outbound	5:00:00 PM	14.25	10.8	14.5	15.5
528	10	Outbound	5:30:00 PM	12.25	11.4	8.75	13
529	10	Outbound	6:00:00 PM	7.8	14	17	12
530	10	Outbound	7:00:00 PM	15	9.25	8.75	18.5
531	10	Outbound	8:00:00 PM	11.75	9	7.666666667	7
532	10	Outbound	10:00:00 PM	6	8.4	8	9.5
533	10	Outbound	9:00:00 PM	9	10.2	8.5	8
534	10	Outbound	12:00:00 AM	15		13	
535	10	Outbound	11:00:00 PM	5.5	6.2	4.25	5
536	13	Inbound	5:10:00 AM	5.4	7.6	6	5
537	13	Inbound	6:10:00 AM	5.6	5.8	10	2
538	13	Inbound	6:37:00 AM	11.8	9.25	9.4	18.5
539	13	Inbound	7:37:00 AM	14.2	14.8	17.8	12
540	13	Inbound	8:07:00 AM	13.2	12.75	10	9
541	13	Inbound	8:37:00 AM	25	29.6	13.8	12
542	13	Inbound	9:08:00 AM	19.4	19.25	18.6	19
543	13	Inbound	10:08:00 AM	22.8	109	90.5	29
544	13	Inbound	10:38:00 AM	16.4	12.4	16.8	16.5
545	13	Inbound	11:08:00 AM	23.8	26.4	19.75	18.5
546	13	Inbound	11:38:00 AM	12.6	18.25	15.8	19.5
547	13	Inbound	12:08:00 PM	18.2	23.75	15	22.5
548	13	Inbound	1:08:00 PM	14.25	14.8	13.6	18
549	13	Inbound	1:38:00 PM	15.5	20.6	23.5	0
550	13	Inbound	2:08:00 PM	23.2	20.8	22	25
551	13	Inbound	2:38:00 PM	22.6	24.66666667	28.8	39
552	13	Inbound	3:07:00 PM	22	24.75	21	25
553	13	Inbound	4:07:00 PM	17.8	18.8	17.6	18
554	13	Inbound	5:08:00 PM	14	19	15.8	18
555	13	Inbound	5:38:00 PM	16.6	10	5.4	13.5
556	13	Inbound	6:38:00 PM	8.25	9.2	9	5
557	13	Inbound	7:31:00 PM	9.6	8.75	10.8	8.5
558	13	Inbound	8:31:00 PM	11.8	10.66666667	12	7
559	13	Inbound	9:38:00 AM	15	15	14.4	11
560	13	Inbound	7:07:00 AM	10.4	12.2	15	9.5
561	13	Inbound	4:37:00 PM	15	11.8	12.25	15.5
562	13	Inbound	12:38:00 PM	21	13.6	67.25	16
563	13	Inbound	3:37:00 PM	27	25.75	27.25	26.5
564	13	Inbound	6:08:00 PM	8.4	7.4	7.25	8.5
565	13	Inbound	9:31:00 PM	6.75	5.75	9.5	8
566	13	Inbound	10:31:00 PM	9.2	10.25	10.66666667	7.5
567	13	Inbound	11:31:00 PM	7	4.75	7.333333333	5
568	13	Outbound	5:30:00 AM	4.4	6	4.4	3.5
569	13	Outbound	6:00:00 AM	8.4	11.5	13.2	12.5
570	13	Outbound	6:30:00 AM	8.4	14	11.5	13
571	13	Outbound	7:00:00 AM	18.4	17	12	14
572	13	Outbound	7:30:00 AM	15.2	26.5	23.8	22.5
573	13	Outbound	8:00:00 AM	26.8	31	26.8	30
574	13	Outbound	8:30:00 AM	21.6	20	22	23.5
575	13	Outbound	9:00:00 AM	23.8	14.6	22.8	18
576	13	Outbound	9:30:00 AM	12.6	6.75	16	12.5
577	13	Outbound	10:00:00 AM	26.2	20.8	19.6	23

	A	B	C	D	E	F	G
3	Average of ons			Week Starting	transit_date_time		
4				3/06/2023	3/13/2023	3/20/2023	3/27/2023
5	current_route_direction	start_time					
578	13	Outbound	10:30:00 AM	22.2	19.2	25	30
579	13	Outbound	11:00:00 AM	13	13.2	14	15
580	13	Outbound	11:30:00 AM	14.4	13.5	17.75	11
581	13	Outbound	12:00:00 PM	19.2	15	14.5	13.5
582	13	Outbound	12:30:00 PM	14.25	16	13	20
583	13	Outbound	1:00:00 PM	18.75	16.4	16.5	0
584	13	Outbound	1:30:00 PM	21.2	19.4	16	33
585	13	Outbound	2:00:00 PM	13.8	13.33333333	11.6	9.5
586	13	Outbound	2:30:00 PM	18.2	13	20.25	16
587	13	Outbound	3:00:00 PM	14.6	11.5	15.5	17.5
588	13	Outbound	3:30:00 PM	19.4	13.2	16.6	14
589	13	Outbound	4:00:00 PM	15.25	17.2	11.75	16
590	13	Outbound	4:30:00 PM	13.2	16.6	16.4	15
591	13	Outbound	5:00:00 PM	11	13.5	12.8	13.5
592	13	Outbound	5:30:00 PM	11.4	14	10.25	15
593	13	Outbound	6:00:00 PM	8.25	8.2	9.4	8.5
594	13	Outbound	7:00:00 PM	8.4	8.75	8.6	9.5
595	13	Outbound	8:00:00 PM	16.4	11	17	6
596	13	Outbound	10:00:00 PM	5.8	5	7.333333333	10.5
597	13	Outbound	9:00:00 PM	9.75	11.5	8.75	5
598	13	Outbound	12:00:00 AM	4.5	7.333333333	4.4	4
599	13	Outbound	11:00:00 PM	4.2	5	9	2.5
600	14	Inbound	6:28:00 AM	12.6	11.2	13.4	21.5
601	14	Inbound	7:08:00 AM	13.2	13.4	12.4	11.5
602	14	Inbound	7:38:00 AM	18	22.5	10.75	16
603	14	Inbound	8:08:00 AM	12.6	12.2	14.8	14.5
604	14	Inbound	9:08:00 AM	8	12	14.4	13
605	14	Inbound	10:08:00 AM	14.6	10.4	13	14.5
606	14	Inbound	10:38:00 AM	30.2	12.6	14.2	16
607	14	Inbound	11:08:00 AM	14.6	13.6	15.75	16
608	14	Inbound	11:38:00 AM	12	15.4	22.8	10
609	14	Inbound	12:08:00 PM	15	14.25	13.6	17
610	14	Inbound	1:08:00 PM	19.8	24.33333333	19	15
611	14	Inbound	1:38:00 PM	23.2	18	16.4	24.5
612	14	Inbound	2:08:00 PM	34.4	27.8	26.75	37.5
613	14	Inbound	2:38:00 PM	31.8	35.6	32.4	30
614	14	Inbound	3:08:00 PM	28.5	36.75	26.8	28
615	14	Inbound	3:38:00 PM	28.8	26.8	35.66666667	36.5
616	14	Inbound	4:08:00 PM	42.6	39	32.6	23
617	14	Inbound	4:38:00 PM	32.5	27.25	33	27
618	14	Inbound	5:08:00 PM	28.4	27.6	28.6	40
619	14	Inbound	5:38:00 PM	17	20.66666667	22.2	14
620	14	Inbound	6:38:00 PM	17.8	30.25	15.25	12
621	14	Inbound	7:08:00 PM	16.6	16.25	19.8	12
622	14	Inbound	11:19:00 PM	11	11.75	11	5
623	14	Inbound	9:19:00 PM	31	28.8	27	19
624	14	Inbound	8:38:00 AM	15.6	14	13.25	13
625	14	Inbound	9:38:00 AM	12.5	61.6	17.4	10
626	14	Inbound	12:38:00 PM	12	19.5	18	16
627	14	Inbound	6:08:00 PM	19.6	20.2	22.66666667	21.5
628	14	Inbound	8:16:00 PM	26	28.5	35.5	32
629	14	Inbound	10:19:00 PM	25.2	22.2	24.4	19.5

	A	B	C	D	E	F	G
3	Average of ons			Week Starting	transit_date_time		
4				3/06/2023	3/13/2023	3/20/2023	3/27/2023
5	current_route_direction	start_time					
630	14	Outbound	5:45:00 AM	19.4	19	21	24
631	14	Outbound	6:15:00 AM	23.6	26.8	25.2	20.5
632	14	Outbound	6:45:00 AM	22	15.5	14.75	24
633	14	Outbound	7:15:00 AM	18.6	28.4	25.4	40
634	14	Outbound	7:45:00 AM	24	15	21	26.5
635	14	Outbound	8:15:00 AM	24	27.6	30.8	40.5
636	14	Outbound	8:45:00 AM	31.2	27	31.6	27.5
637	14	Outbound	9:15:00 AM	25.4	27.2	25.75	23.5
638	14	Outbound	9:45:00 AM	28.4	24.8	24.2	26.5
639	14	Outbound	10:15:00 AM	39.4	36	25.25	33
640	14	Outbound	10:45:00 AM	16.6	21	22.6	27
641	14	Outbound	11:15:00 AM	30.75	26.75	30.8	27.5
642	14	Outbound	11:45:00 AM	20.6	20.25	21.4	26
643	14	Outbound	12:15:00 PM	22.4	27.33333333	20	23.5
644	14	Outbound	12:45:00 PM	25.6	22.6	27.6	21.5
645	14	Outbound	1:15:00 PM	24.6	19.6	30.25	25.5
646	14	Outbound	1:45:00 PM	33.8	27	21.4	29
647	14	Outbound	2:02:00 PM				1
648	14	Outbound	2:15:00 PM	20.2	20	27	22
649	14	Outbound	2:45:00 PM	27.6	30.4	27.33333333	27.5
650	14	Outbound	3:15:00 PM	32.2	35.8	28.4	31.5
651	14	Outbound	3:45:00 PM	27.75	30.5	30.6	26.5
652	14	Outbound	4:15:00 PM	26.2	29	23.4	11
653	14	Outbound	4:45:00 PM	17.5	23.66666667	18.2	19.5
654	14	Outbound	5:15:00 PM	23.6	18.25	29.66666667	22
655	14	Outbound	5:45:00 PM	13.4	14.5	17.25	17
656	14	Outbound	6:15:00 PM	13.6	18.25	10.6	10
657	14	Outbound	6:45:00 PM	26	13.4	13.4	8
658	14	Outbound	7:30:00 PM	11.2	10.5	13	11
659	14	Outbound	8:30:00 PM	8	19.4	13.33333333	11.5
660	14	Outbound	10:30:00 PM	5.6	8	6	6
661	14	Outbound	11:30:00 PM	7.25	6.2	8.5	8
662	14	Outbound	9:30:00 PM	9.8	12.6	13.2	16.5
663	15	Inbound	5:27:00 AM	12.4	10.66666667	14.33333333	11
664	15	Inbound	6:00:00 AM		10		
665	15	Inbound	6:27:00 AM	13.4	17.6	13.4	15.5
666	15	Inbound	7:57:00 AM	12.6	9.6	14.5	13.5
667	15	Inbound	8:27:00 AM	15.66666667	10.25	11.8	17
668	15	Inbound	9:27:00 AM	10.2	7	11	9.5
669	15	Inbound	10:27:00 AM	8.2	8.25	10	16
670	15	Inbound	10:57:00 AM	8.66666667	8	10.2	7
671	15	Inbound	11:27:00 AM	8	9.4	17	5
672	15	Inbound	11:57:00 AM	7.5	7	6.6	4.5
673	15	Inbound	12:57:00 PM	14.8	30.75	7.66666667	9
674	15	Inbound	1:57:00 PM	16.6	18.6	16.4	20
675	15	Inbound	2:27:00 PM	8.6	6.6	8.2	6
676	15	Inbound	2:57:00 PM	14	7.8	11.33333333	13.5
677	15	Inbound	3:27:00 PM	16.25	12.75	18	12
678	15	Inbound	3:57:00 PM	10	9.8	11.6	10.5
679	15	Inbound	4:27:00 PM	14.75	9.25	15.5	12
680	15	Inbound	4:57:00 PM	24.4	12	5.66666667	8.5
681	15	Inbound	5:57:00 PM	12.2	8.4	4	4

	A	B	C	D	E	F	G
3	Average of ons			Week Starting	transit_date_time		
4				3/06/2023	3/13/2023	3/20/2023	3/27/2023
5	current_route_direction	start_time					
682	15	Inbound	8:27:00 PM	4.4	6.4	3.5	9
683	15	Inbound	7:27:00 AM	18.5	12.25	10.6	11
684	15	Inbound	8:57:00 AM	10.8	8.6	12	28
685	15	Inbound	6:57:00 AM	8.8	9.8	8.8	5
686	15	Inbound	9:57:00 AM	10.4	11.8	8.2	6
687	15	Inbound	12:27:00 PM	11.6	40.25	25.66666667	15
688	15	Inbound	1:27:00 PM	15.66666667	13.75	16.2	9
689	15	Inbound	5:27:00 PM	9.75	9.5	10.75	4
690	15	Inbound	6:27:00 PM	4.5	6	9.25	3.5
691	15	Inbound	7:27:00 PM	5.25	5.8	9	7
692	15	Inbound	9:27:00 PM	7	7.6	8.25	6
693	15	Inbound	10:27:00 PM	2.333333333	2.8	2.666666667	0
694	15	Inbound	11:27:00 PM	3.2	6.4	6	7.5
695	15	Outbound	6:00:00 AM	3.8	7	7.4	9.5
696	15	Outbound	6:30:00 AM	6.6	4.6	7.4	7
697	15	Outbound	7:00:00 AM	7.25	6	7.2	7
698	15	Outbound	7:30:00 AM		2	0	
699	15	Outbound	8:00:00 AM	9	11	6.4	10
700	15	Outbound	8:30:00 AM	3	2.8	3.6	7.5
701	15	Outbound	9:00:00 AM	6.666666667	7.25	8.8	5
702	15	Outbound	9:30:00 AM	10.75	7.2	9.666666667	7.5
703	15	Outbound	10:00:00 AM	8.8	9.8	11.75	8.5
704	15	Outbound	10:30:00 AM	8.4	7.8	7.75	6
705	15	Outbound	11:00:00 AM	12	9	5.6	14.5
706	15	Outbound	11:30:00 AM	8.75	8.6	9	12.5
707	15	Outbound	12:00:00 PM	8.2	10.4	9	10
708	15	Outbound	12:30:00 PM	6.8	7	8	9
709	15	Outbound	1:00:00 PM	17	15	16.25	14
710	15	Outbound	1:30:00 PM	10.8	8	10.75	9.5
711	15	Outbound	2:00:00 PM	9.5	8.8	27.4	14.5
712	15	Outbound	2:30:00 PM	11.33333333	11	9.4	12.5
713	15	Outbound	3:00:00 PM	18	13.25	17.2	11
714	15	Outbound	3:30:00 PM	7.25	13.8	9.4	14.5
715	15	Outbound	4:00:00 PM	12.5	15.5	18.75	14.5
716	15	Outbound	4:30:00 PM	13.8	12	16.33333333	17
717	15	Outbound	5:00:00 PM	13.5	13.2	11.66666667	8
718	15	Outbound	5:30:00 PM	11.8	11	11.5	20
719	15	Outbound	6:00:00 PM	13	11	11.4	6
720	15	Outbound	7:00:00 PM	17	12	19.8	13
721	15	Outbound	8:00:00 PM	7	10.4	6.5	11
722	15	Outbound	10:00:00 PM	9	9.8	10.25	10
723	15	Outbound	9:00:00 PM	12.5	13	10.6	9.5
724	15	Outbound	12:00:00 AM	3	3.666666667	2	18
725	15	Outbound	11:00:00 PM	3.2	3.75	3.4	5.5
726	16	Inbound	5:23:00 AM	7.25	5.2	6	6
727	16	Inbound	6:23:00 AM	18	29.75	28.2	21.5
728	16	Inbound	6:38:00 AM	13	12	9.2	11
729	16	Inbound	6:53:00 AM	13.75	10.2	10.8	10
730	16	Inbound	7:08:00 AM	13	8.2	10.6	12
731	16	Inbound	7:23:00 AM	13.75	11.2	9.8	9
732	16	Inbound	7:38:00 AM	10.4	8.4	10.66666667	9.5
733	16	Inbound	7:53:00 AM		12	20	



	A	B	C	D	E	F	G
3	Average of ons			Week Starting	transit_date_time		
4				3/06/2023	3/13/2023	3/20/2023	3/27/2023
5	current_route_direction	start_time					
734	16	Inbound	8:08:00 AM	7.6	11.8	10.2	15.5
735	16	Inbound	9:08:00 AM	10	9	30.6	14.5
736	16	Inbound	9:23:00 AM	13.33333333	15	14.6	10
737	16	Inbound	9:53:00 AM	19.75	9.6	13.33333333	16.5
738	16	Inbound	10:08:00 AM	14.2	14.66666667	13.5	9
739	16	Inbound	10:23:00 AM	16	12.4	15.25	16.5
740	16	Inbound	10:38:00 AM	10.2	11	14	12
741	16	Inbound	11:08:00 AM	9.4	13	8.333333333	7
742	16	Inbound	11:38:00 AM	6.333333333	8.5	10.75	10
743	16	Inbound	11:53:00 AM	14.4	19.4	10.6	87.5
744	16	Inbound	12:08:00 PM	14.25	9.6	19.75	13
745	16	Inbound	12:23:00 PM	19.5	10.25	21.75	8
746	16	Inbound	12:53:00 PM	16.2	17.4	11.4	14
747	16	Inbound	1:08:00 PM	6.2	6.666666667	16.33333333	18
748	16	Inbound	1:23:00 PM	15	10.2	9.25	15
749	16	Inbound	1:38:00 PM	8	9.75	7.4	2.5
750	16	Inbound	2:08:00 PM	15.5	14.6	12.25	12.5
751	16	Inbound	2:23:00 PM	26.25	26	27.75	29.5
752	16	Inbound	2:38:00 PM	19.75	18.75	15.75	16.5
753	16	Inbound	2:53:00 PM	23.33333333	21	26.4	27.5
754	16	Inbound	3:08:00 PM	17	16.4	19.5	18
755	16	Inbound	3:23:00 PM	24.4	24.8	19.4	34
756	16	Inbound	3:38:00 PM	14.4	8.4	23.5	17
757	16	Inbound	4:08:00 PM	15.6	16	14.6	16
758	16	Inbound	4:23:00 PM	22.4	16.5	16	26
759	16	Inbound	4:38:00 PM	15.33333333	13.25	19	12.5
760	16	Inbound	4:53:00 PM	17.75	16.2	24.6	16.5
761	16	Inbound	5:08:00 PM	14.8	15	9.4	21
762	16	Inbound	5:23:00 PM	9	8.2	18.25	10.5
763	16	Inbound	5:38:00 PM	3.333333333	9	10.8	6.5
764	16	Inbound	5:53:00 PM	8.4	7.4	7.25	4
765	16	Inbound	6:53:00 PM	7.333333333	6.25	8.4	5.5
766	16	Inbound	7:23:00 PM	10.2	10.33333333	9.5	8.5
767	16	Inbound	8:53:00 PM	3.5	6	9	7
768	16	Inbound	9:53:00 PM	6.25	6.5	5.8	6
769	16	Inbound	6:23:00 PM	5.25	5	5.8	8.5
770	16	Inbound	8:53:00 AM	18.2	17.6	17.4	15
771	16	Inbound	10:23:00 PM	6.75	6.6	7.25	1
772	16	Inbound	9:23:00 PM	9.25	10	10	12
773	16	Inbound	8:38:00 AM	12.5	14.8	11.2	13
774	16	Inbound	9:38:00 AM	10.6	8.4	9.5	9
775	16	Inbound	12:38:00 PM	48	12.25	14.2	15
776	16	Inbound	6:08:00 PM	5.2	3.75	4.6	6
777	16	Inbound	5:53:00 AM	17.4	15.8	17.75	15
778	16	Inbound	8:23:00 AM	18.5	14.5	13.4	13
779	16	Inbound	10:53:00 AM	19.2	15.2	18.25	16
780	16	Inbound	11:23:00 AM	19.4	15.5	19.6	13.5
781	16	Inbound	1:53:00 PM	14.6	15.8	15.5	20
782	16	Inbound	7:53:00 PM	9.25	7.6	11.6	8.5
783	16	Inbound	8:23:00 PM	12.2	9.2	8.6	11
784	16	Inbound	10:53:00 PM	10.6	13.25	8.25	8.5
785	16	Inbound	11:23:00 PM	7.8	7.75	5.4	5

	A	B	C	D	E	F	G
3	Average of ons			Week Starting	transit_date_time		
4				3/06/2023	3/13/2023	3/20/2023	3/27/2023
5	current_route_direction	start_time					
786	16	Inbound	3:53:00 PM	23.66666667	16.8	21.66666667	14.5
787	16	Outbound	5:30:00 AM	9.8	9.2	9.25	7
788	16	Outbound	6:00:00 AM	15	12.6	15	16.5
789	16	Outbound	6:15:00 AM	7	10.8	10.4	8
790	16	Outbound	6:30:00 AM	12	9.4	16	22
791	16	Outbound	6:45:00 AM	13.25	13.5	13.4	17
792	16	Outbound	7:00:00 AM	10.5	8.5	12.2	12
793	16	Outbound	7:15:00 AM	9.6	10.8	12.33333333	11
794	16	Outbound	7:30:00 AM	13.4	12.25	13.75	14.5
795	16	Outbound	7:45:00 AM	11	12.25	11.6	16
796	16	Outbound	8:00:00 AM	9.66666667	13.25	16.6	9
797	16	Outbound	8:15:00 AM	7.75	10.6	8.8	7
798	16	Outbound	8:30:00 AM	12.6	11.4	18	19
799	16	Outbound	8:45:00 AM	10.5	10	18	11.5
800	16	Outbound	9:00:00 AM	15	10.6	14.4	12
801	16	Outbound	9:15:00 AM	13.4	9.8	10.5	6.5
802	16	Outbound	9:30:00 AM	12.8	13.6	13.6	17
803	16	Outbound	9:45:00 AM	10.4	6	10.75	11
804	16	Outbound	10:00:00 AM	10.2	9.5	13.2	8.5
805	16	Outbound	10:15:00 AM	9.2	13	12.5	10
806	16	Outbound	10:30:00 AM	6.333333333	8.5	9	10.5
807	16	Outbound	10:45:00 AM	9.2	11.33333333	12.66666667	13
808	16	Outbound	11:00:00 AM	12.2	8.25	13.6	13
809	16	Outbound	11:15:00 AM	10.66666667	10.33333333	9.25	13.5
810	16	Outbound	11:30:00 AM	10.8	7	12.2	8
811	16	Outbound	11:45:00 AM	8.75	14.6	10.25	9.5
812	16	Outbound	12:00:00 PM	12.75	13.25	13.5	19.5
813	16	Outbound	12:15:00 PM	6.5	8.75	11.2	7.5
814	16	Outbound	12:30:00 PM	14.8	12	12.33333333	11.5
815	16	Outbound	12:45:00 PM	8	7	10.33333333	8
816	16	Outbound	1:00:00 PM	14	8.75	7.8	5
817	16	Outbound	1:15:00 PM	16.33333333	12.25	10.6	17.5
818	16	Outbound	1:30:00 PM	7	7.4	13.6	14
819	16	Outbound	1:45:00 PM	7.25	12	10.5	11
820	16	Outbound	2:00:00 PM	14.6	12	15	5
821	16	Outbound	2:15:00 PM	10.5	13.25	19.25	16.5
822	16	Outbound	2:30:00 PM	12	14	15.33333333	16.5
823	16	Outbound	2:45:00 PM	8.4	9.2	14.5	15
824	16	Outbound	3:00:00 PM	10	10.4	10.8	21
825	16	Outbound	3:15:00 PM	13	12.4	14	12.5
826	16	Outbound	3:30:00 PM	12	13	13.33333333	8
827	16	Outbound	3:45:00 PM	11.4	12.6	14.4	15
828	16	Outbound	4:00:00 PM	14.2	12	13	18
829	16	Outbound	4:15:00 PM	11.33333333	8	9.6	8.5
830	16	Outbound	4:30:00 PM	15.25	11.6	10.2	10.5
831	16	Outbound	4:45:00 PM	10.2	9.5	7.4	10
832	16	Outbound	5:00:00 PM	14	11	12.5	11
833	16	Outbound	5:15:00 PM	11.33333333	11.75	13	11.5
834	16	Outbound	5:30:00 PM	9.4	13.4	11.2	10
835	16	Outbound	5:45:00 PM	9.2	9.5	7.6	8
836	16	Outbound	6:00:00 PM	8.25	8.8	10.5	9
837	16	Outbound	6:30:00 PM	10.33333333	18.75	20.8	23

	A	B	C	D	E	F	G
3	Average of ons			Week Starting	transit_date_time		
4				3/06/2023	3/13/2023	3/20/2023	3/27/2023
5	current_route_direction	start_time					
838	16	Outbound	7:00:00 PM	11.2	13	19.75	24.5
839	16	Outbound	7:30:00 PM	17.25	15	13.8	19
840	16	Outbound	8:00:00 PM	8.8	8	11.4	8
841	16	Outbound	8:30:00 PM	11.33333333	9.2	14	11.5
842	16	Outbound	10:00:00 PM	10.25	10.6	9.5	17
843	16	Outbound	10:30:00 PM	8.6	10	10.25	5.5
844	16	Outbound	9:00:00 PM	8.5	7.6	7.25	10.5
845	16	Outbound	11:30:00 PM	6.2	8.333333333	8.5	6
846	16	Outbound	12:00:00 AM	23.8	5.75	3.75	6
847	16	Outbound	11:00:00 PM	5.2	7.6	4	4
848	16	Outbound	9:30:00 PM	9.75	16.8	10.2	13
849	19	Inbound	5:11:00 AM	9.5	8.75	8.2	7.5
850	19	Inbound	5:41:00 AM	13.6	12	15	16
851	19	Inbound	6:41:00 AM	21.2	23.8	20	27
852	19	Inbound	7:42:00 AM	12	9	10.4	10.5
853	19	Inbound	8:42:00 AM	7.75	13.6	9	5.5
854	19	Inbound	9:12:00 AM	10	6	6.5	
855	19	Inbound	10:12:00 AM	6.25	6.4	9.5	8
856	19	Inbound	10:42:00 AM	8.5	10.75	7.5	7.5
857	19	Inbound	11:42:00 AM	10.25	9.8	9.5	11
858	19	Inbound	12:42:00 PM	7.4	8	8.5	5.5
859	19	Inbound	1:12:00 PM	6.25	8.5	12.2	10
860	19	Inbound	1:41:00 PM	8.6	10.25	10.6	8.5
861	19	Inbound	2:12:00 PM	13.4	14.2	14.25	22
862	19	Inbound	2:42:00 PM	18.5	12.4	17.2	16.5
863	19	Inbound	3:12:00 PM	20	16.75	17.25	16.5
864	19	Inbound	4:12:00 PM	12.66666667	14.5	16.2	11
865	19	Inbound	4:42:00 PM	14.4	13.8	16.4	15
866	19	Inbound	5:12:00 PM	17.5	15.4	23	25.5
867	19	Inbound	5:42:00 PM	7	7.25	8	11.5
868	19	Inbound	6:12:00 PM	5.75	8.6	13.5	10
869	19	Inbound	6:40:00 PM	8.6	4	7	8
870	19	Inbound	7:41:00 PM	9	7.5	6.6	5
871	19	Inbound	8:40:00 PM	6.4	9.666666667	10.25	11
872	19	Inbound	8:12:00 AM	13	8.6	7.8	5
873	19	Inbound	7:12:00 AM	12.2	11	9.25	13
874	19	Inbound	9:42:00 AM	12.6	16.4	10.4	12.5
875	19	Inbound	11:12:00 AM	6.6	9	7.8	10
876	19	Inbound	12:12:00 PM	12.25	10.2	9.4	9
877	19	Inbound	3:42:00 PM	30	16	21.5	23.5
878	19	Inbound	9:40:00 PM	5.8	6	6.4	6
879	19	Inbound	10:40:00 PM	3	2.333333333	3	5.5
880	19	Outbound	5:00:00 AM	9.6	6.6	8.333333333	10
881	19	Outbound	6:00:00 AM	21	18	20.2	27.5
882	19	Outbound	6:30:00 AM	8	13.4	12.5	15.5
883	19	Outbound	7:00:00 AM	15.6	15.8	15.4	11.5
884	19	Outbound	7:30:00 AM	22.5	22.6	27.2	23
885	19	Outbound	8:00:00 AM	8.75	7	10.4	18
886	19	Outbound	8:30:00 AM		10	2	
887	19	Outbound	9:00:00 AM	4.6	2.8	5.8	3.5
888	19	Outbound	9:30:00 AM	6.5	8.6	11.25	11.5
889	19	Outbound	10:00:00 AM	9.25	27.4	14.5	13

	A	B	C	D	E	F	G
3	Average of ons			Week Starting	transit_date_time		
4				3/06/2023	3/13/2023	3/20/2023	3/27/2023
5	current_route_direction	start_time					
890	19	Outbound	10:30:00 AM	10.8	12	15.2	7.5
891	19	Outbound	11:00:00 AM	10.75	7.2	10.75	11.5
892	19	Outbound	11:30:00 AM	11	7.6	10.6	12
893	19	Outbound	12:00:00 PM	5.2	7.333333333	5.25	3
894	19	Outbound	12:30:00 PM	13.5	13.75	14.4	14
895	19	Outbound	1:00:00 PM	10.4	6.75	13.2	17.5
896	19	Outbound	1:30:00 PM	13.5	13.2	12.75	11
897	19	Outbound	2:00:00 PM	13.25	10	10.2	15
898	19	Outbound	2:30:00 PM	15	14	16.25	15
899	19	Outbound	3:00:00 PM	19.25	14	15.5	12
900	19	Outbound	3:30:00 PM	17.33333333	17.25	18.2	21
901	19	Outbound	4:00:00 PM	15	17.2	16.2	16
902	19	Outbound	4:30:00 PM	13	17	13.33333333	17.5
903	19	Outbound	5:00:00 PM	4.5	8	6.75	6
904	19	Outbound	5:30:00 PM	19.5	16.2	26	15
905	19	Outbound	6:00:00 PM	11.8	13.6	11	11
906	19	Outbound	7:00:00 PM	16.4	12.8	18.8	17.5
907	19	Outbound	8:00:00 PM	13	14.66666667	14.75	17
908	19	Outbound	10:00:00 PM	5.75	6.6	10	7
909	19	Outbound	9:00:00 PM	12.4	12.33333333	13.4	21
910	19	Outbound	12:00:00 AM	4	4.2	2.5	2
911	19	Outbound	11:00:00 PM	5	5.6	5	8
912	23	Inbound	5:08:00 AM	8.6	10.2	10	7
913	23	Inbound	6:08:00 AM	15.4	12.6	12.8	11.5
914	23	Inbound	6:53:00 AM	13	14	13.4	9
915	23	Inbound	7:23:00 AM	11.4	9.4	15.8	10
916	23	Inbound	7:53:00 AM	13.8	12	9.5	15
917	23	Inbound	9:23:00 AM	9.25	7.8	11.75	6
918	23	Inbound	9:53:00 AM	9.4	5	10.8	13
919	23	Inbound	10:23:00 AM	14.8	12.6	9.5	6.5
920	23	Inbound	11:53:00 AM	14.75	16.25	11.8	15
921	23	Inbound	12:23:00 PM	14.8	14	15.33333333	5.5
922	23	Inbound	12:53:00 PM	13.6	13.5	13	10
923	23	Inbound	1:23:00 PM	13.6	13	15.8	19
924	23	Inbound	2:23:00 PM	15.4	12.8	13.75	18.5
925	23	Inbound	2:53:00 PM	20.4	14.75	16.2	26
926	23	Inbound	3:23:00 PM	12.25	16.2	14.25	17
927	23	Inbound	4:23:00 PM	15.66666667	16.4	16.2	17
928	23	Inbound	4:53:00 PM	17.8	8.6	13.5	
929	23	Inbound	5:23:00 PM	13.2	10.2	8	10
930	23	Inbound	5:53:00 PM	32.75	11.4	12.8	21
931	23	Inbound	7:10:00 PM	7.75	9.4	7	10
932	23	Inbound	8:10:00 PM	7	11.8	13.75	5.5
933	23	Inbound	11:10:00 PM	8.75	8.75	9.8	9
934	23	Inbound	6:23:00 PM	10	8.333333333	8	6
935	23	Inbound	8:53:00 AM	11.8	9.25	16.4	10.5
936	23	Inbound	8:23:00 AM	15.4	12.8	12.8	15
937	23	Inbound	10:53:00 AM	10.5	10.2	7.25	8
938	23	Inbound	11:23:00 AM	12.25	13.2	13.6	9
939	23	Inbound	1:53:00 PM	8.4	15.8	12.4	12.5
940	23	Inbound	3:53:00 PM	17	18.75	17.2	14
941	23	Inbound	9:10:00 PM	8.6	11.33333333	11.5	8

	A	B	C	D	E	F	G
3	Average of ons			Week Starting	transit_date_time		
4				3/06/2023	3/13/2023	3/20/2023	3/27/2023
5	current_route_direction	start_time					
942	23	Inbound	10:10:00 PM	10	12.2	12.5	8.5
943	23	Outbound	5:30:00 AM	3.6	3.75	3.4	3
944	23	Outbound	6:15:00 AM	7.4	6.5	7.6	5.5
945	23	Outbound	6:45:00 AM	4.8	8.4	10.6	0
946	23	Outbound	7:15:00 AM	6.2	6.666666667	8	8
947	23	Outbound	7:45:00 AM	14.2	7.6	8.2	7.5
948	23	Outbound	8:15:00 AM	11	8	10.4	11
949	23	Outbound	8:45:00 AM	8.25	8.6	6.75	5
950	23	Outbound	9:15:00 AM	11.4	12	11	10
951	23	Outbound	9:45:00 AM	15	13.4	12.25	7.5
952	23	Outbound	10:15:00 AM	14	13	11.5	15
953	23	Outbound	10:45:00 AM	13	9.2	9.8	8
954	23	Outbound	11:15:00 AM	14.75	10.75	14.4	14
955	23	Outbound	11:45:00 AM	10.8	12.2	12.66666667	5
956	23	Outbound	12:15:00 PM	18.2	11.2	17	12
957	23	Outbound	12:45:00 PM	14	14.5	16.2	20
958	23	Outbound	1:15:00 PM	14.6	11	17.8	16.5
959	23	Outbound	1:45:00 PM	14	15.8	23.75	13.5
960	23	Outbound	2:15:00 PM	13.2	13.25	13.2	11
961	23	Outbound	2:45:00 PM	10.5	15	14	8
962	23	Outbound	3:15:00 PM	18.5	13.5	15.8	19
963	23	Outbound	3:45:00 PM	19	18.2	14.6	15.5
964	23	Outbound	4:15:00 PM	20.4	15.6	15.75	
965	23	Outbound	4:45:00 PM	12.6	16.8	9.5	13
966	23	Outbound	5:15:00 PM	10.25	10.2	15.6	20.5
967	23	Outbound	5:45:00 PM	11.8	10.66666667	12	10
968	23	Outbound	6:30:00 PM	14	19.4	18.4	17.5
969	23	Outbound	7:30:00 PM	12.4	15.2	9.5	13.5
970	23	Outbound	8:30:00 PM	12.4	11.33333333	10.5	1
971	23	Outbound	10:30:00 PM	10	6	8.6	9
972	23	Outbound	11:30:00 PM	9	8	6.25	4.5
973	23	Outbound	9:30:00 PM	10.5	9.4	7.6	10.5
974	23	Outbound	1:10:00 AM	15			
975	24	Inbound	5:12:00 AM	3.6	6	7.25	4
976	24	Inbound	6:22:00 AM	8.75	8	12	10
977	24	Inbound	6:52:00 AM	10.6	10.4	9.4	11.5
978	24	Inbound	7:22:00 AM	9.8	13.6	12.4	13.5
979	24	Inbound	7:52:00 AM	7.333333333	6.5	10.6	11
980	24	Inbound	8:52:00 AM	12	6.75	5.8	10.5
981	24	Inbound	9:52:00 AM	6	11.8	8.6	5
982	24	Inbound	10:22:00 AM	4.4	4	5	3.5
983	24	Inbound	10:52:00 AM	10.6	8.8	3.6	2
984	24	Inbound	11:22:00 AM	4	0	10.5	
985	24	Inbound	12:52:00 PM	4.666666667	8.4	3.333333333	6.5
986	24	Inbound	2:22:00 PM	5.8	5.666666667	3.75	13.5
987	24	Inbound	2:52:00 PM	19	5	4	5
988	24	Inbound	3:22:00 PM	3.75	4.6	6	6.5
989	24	Inbound	3:52:00 PM	2	5.25	1	4
990	24	Inbound	4:22:00 PM	4.8	5.25	6.4	3
991	24	Inbound	5:22:00 PM	4	2.5	3.4	8.5
992	24	Inbound	5:52:00 PM	4.2	2.6	6.25	8
993	24	Inbound	8:00:00 PM	3			

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3	Average of ons			Week Starting	transit_date_time		
4				3/06/2023	3/13/2023	3/20/2023	3/27/2023
5	current_route_direction	start_time					
994	24	Inbound	8:27:00 PM	1.6	1.4	3	0.5
995	24	Inbound	1:22:00 PM	5	5.4	7.4	9.5
996	24	Inbound	6:27:00 PM	2.5	2.5	11.5	4
997	24	Inbound	7:27:00 PM	3	3.666666667	8.666666667	13
998	24	Inbound	9:27:00 PM	2.4	1.5	37	1
999	24	Inbound	10:27:00 PM	1.25	3.4	2.5	3.5
1000	24	Inbound	11:27:00 PM	4.25	9.4	4.6	1.5
1001	24	Inbound	8:22:00 AM	8.2	5.25	10.6	6
1002	24	Inbound	9:22:00 AM	11	7	9	11.5
1003	24	Inbound	11:52:00 AM	6.666666667	10	7.8	4.5
1004	24	Inbound	12:22:00 PM	9.4	7.75	5	4
1005	24	Inbound	1:52:00 PM	5.75	5	4.25	8.5
1006	24	Inbound	4:52:00 PM	7.25	1.6	9.2	3
1007	24	Outbound	6:00:00 AM	3.75	2.8	3.25	2
1008	24	Outbound	6:30:00 AM	2.4	1.8	2.8	3
1009	24	Outbound	7:00:00 AM	2.8	2.6	3.4	6.5
1010	24	Outbound	7:30:00 AM	6.75	5	4	5
1011	24	Outbound	8:00:00 AM	3.8	4.75	4.8	6
1012	24	Outbound	8:30:00 AM	2	1.5	4.6	3
1013	24	Outbound	9:00:00 AM	3.6	5.4	3	2
1014	24	Outbound	9:30:00 AM	2.75	3	2.2	4.5
1015	24	Outbound	10:00:00 AM	6.6	7.2	6.2	5
1016	24	Outbound	10:30:00 AM	5	3.4	3.8	2.5
1017	24	Outbound	11:00:00 AM	0	3	4.5	
1018	24	Outbound	11:30:00 AM	5.666666667	5	4	8
1019	24	Outbound	12:00:00 PM	4.6	3.25	5.8	1.5
1020	24	Outbound	12:30:00 PM	5.333333333	5.4	7.333333333	7
1021	24	Outbound	1:00:00 PM	5.8	5.6	6.8	6
1022	24	Outbound	1:30:00 PM	7.75	6.5	4.75	6
1023	24	Outbound	2:00:00 PM	4.8	5	5.5	8.5
1024	24	Outbound	2:30:00 PM	3.8	5	4.4	1.5
1025	24	Outbound	3:00:00 PM	7.75	6.6	4.5	4
1026	24	Outbound	3:30:00 PM	7.333333333	8.5	9.2	19.5
1027	24	Outbound	4:00:00 PM	10.2	9	8	12
1028	24	Outbound	4:30:00 PM	9	7	7.6	10.5
1029	24	Outbound	5:00:00 PM	8.333333333	11	6.6	9.5
1030	24	Outbound	5:30:00 PM	5.6	7.4	8	2.5
1031	24	Outbound	6:00:00 PM	8.25	8.5	12.75	12
1032	24	Outbound	7:00:00 PM	9.2	3.333333333	11.33333333	6
1033	24	Outbound	8:00:00 PM	5.2	4.4	6	4
1034	24	Outbound	10:00:00 PM	9.25	5	6.25	5
1035	24	Outbound	9:00:00 PM	3.2	6.333333333	4.5	3
1036	24	Outbound	12:00:00 AM	4.6	7	5.4	2
1037	24	Outbound	11:00:00 PM	3.25	4	3.8	4
1038	24	Outbound	9:24:00 PM	1			
1039	40	Inbound	6:20:00 AM	5.25	6.2	6.6	12.5
1040	40	Inbound	6:50:00 AM	5.5	3.75	5.8	5.5
1041	40	Inbound	7:20:00 AM	4.25	4.25	3.8	4.5
1042	40	Inbound	7:50:00 AM	3	3	3.8	6
1043	40	Inbound	8:20:00 AM	5	3.2	4.2	5
1044	40	Inbound	8:50:00 AM	6.6	7.4	8	7.5
1045	40	Inbound	9:20:00 AM	2.8	2.6	5	3



	A	B	C	D	E	F	G
3	Average of ons			Week Starting	transit_date_time		
4				3/06/2023	3/13/2023	3/20/2023	3/27/2023
5	current_route_direction	start_time					
1046	40	Inbound	9:50:00 AM	5.25	2.25	6	3.5
1047	40	Inbound	10:20:00 AM	6.4	4.6	5	7
1048	40	Inbound	10:50:00 AM	4.2	5	4.75	9
1049	40	Inbound	11:20:00 AM		3.75	1.333333333	1
1050	40	Inbound	11:50:00 AM	7.75	3.2	7.5	8
1051	40	Inbound	12:20:00 PM	4.6	18	2.2	2
1052	40	Inbound	12:50:00 PM	7.6	8.2	9.8	9.5
1053	40	Inbound	1:20:00 PM	6.8	4.4	7.6	5
1054	40	Inbound	1:50:00 PM	5	6.6	10.8	6
1055	40	Inbound	2:20:00 PM	5.75	9.25	13.4	11.5
1056	40	Inbound	2:50:00 PM	8.2	9.8	11.6	9
1057	40	Inbound	3:20:00 PM	10.4	7.4	9.4	7
1058	40	Inbound	3:50:00 PM	5.6	10.4	8	11.5
1059	40	Inbound	4:20:00 PM	13.66666667	7	6.666666667	3
1060	40	Inbound	4:50:00 PM	4.75	12.25	6.8	10.5
1061	40	Inbound	5:20:00 PM	5.2	10.2	14	7
1062	40	Inbound	5:50:00 PM	4.6	5.75	5.75	8.5
1063	40	Inbound	6:20:00 PM	9.75	5.2	8	6
1064	40	Inbound	6:50:00 PM	8.5	5.6	8	7
1065	40	Inbound	7:20:00 PM	3.75	3.6	6.4	3
1066	40	Inbound	9:20:00 PM	4	5	5.4	5.5
1067	40	Inbound	11:20:00 PM	4.8	3	4.8	3
1068	40	Inbound	8:11:00 AM	1			
1069	40	Inbound	10:20:00 PM	3.2	2.8	2.2	6.5
1070	40	Inbound	8:20:00 PM	5.25	5	9.6	6.5
1071	40	Outbound	6:13:00 AM	3	3.25	4.4	2.5
1072	40	Outbound	6:43:00 AM	0.5	2.6	1.5	4
1073	40	Outbound	7:13:00 AM	4.2	2.8	5.8	1
1074	40	Outbound	7:43:00 AM	4.4	3.4	2.6	1
1075	40	Outbound	8:13:00 AM	7.5	4.25	5.4	4
1076	40	Outbound	8:43:00 AM	8.4	7.2	8	10.5
1077	40	Outbound	9:43:00 AM	5.2	2.4	3.8	2
1078	40	Outbound	10:13:00 AM	3.8	3.2	7	6
1079	40	Outbound	10:25:00 AM			2	
1080	40	Outbound	10:43:00 AM		4.25	6	2
1081	40	Outbound	11:43:00 AM	7	3.8	6	7
1082	40	Outbound	12:42:00 PM	3.75	6	4.2	2.5
1083	40	Outbound	1:12:00 PM	5.8	3.6	6.6	4.5
1084	40	Outbound	1:42:00 PM	5.2	6.4	5.25	4
1085	40	Outbound	2:12:00 PM		8.25	7	
1086	40	Outbound	2:42:00 PM	8.2	10.4	13	7
1087	40	Outbound	3:12:00 PM	11.2	10.25	10.25	10
1088	40	Outbound	4:12:00 PM	6.4	5.25	7.6	7
1089	40	Outbound	4:42:00 PM	8.25	10.6	9.2	11
1090	40	Outbound	5:12:00 PM	6	6.5	5.6	8
1091	40	Outbound	5:42:00 PM	5.4	5.4	7.8	5
1092	40	Outbound	6:13:00 PM	6	5	4.6	5
1093	40	Outbound	6:29:00 PM		36		
1094	40	Outbound	6:43:00 PM	3	4	4.6	6
1095	40	Outbound	9:52:00 PM	2	2.6	4	2
1096	40	Outbound	7:14:00 AM		1		
1097	40	Outbound	9:13:00 AM	5.5	5.25	6	7

	A	B	C	D	E	F	G
3	Average of ons			Week Starting	transit_date_time		
4				3/06/2023	3/13/2023	3/20/2023	3/27/2023
5	current_route_direction	start_time					
1098	40	Outbound	11:12:00 AM	5.2	3.2	5.4	6.5
1099	40	Outbound	12:12:00 PM	8.75	5.75	8	1.5
1100	40	Outbound	3:42:00 PM	10	8	10	4
1101	40	Outbound	8:52:00 PM	4.4	4.8	4	5.5
1102	40	Outbound	10:51:00 PM	2.2	3.4	2.2	1.5
1103	40	Outbound	11:51:00 PM	1.4	0.666666667	1.25	2
1104	40	Outbound	7:52:00 PM	3	4.25	4.8	7.5
1105	41	Inbound	5:00:00 AM	12.2	9.6	10	14
1106	41	Inbound	6:00:00 AM	19.5	18	16.2	16.5
1107	41	Inbound	6:05:00 AM	8.8	7.2	12	12.5
1108	41	Inbound	6:30:00 AM	16.4	18.2	24	17.5
1109	41	Inbound	7:00:00 AM	22.2	16.8	25	15
1110	41	Inbound	7:05:00 AM	7.5	6.2	8.2	10.5
1111	41	Inbound	7:30:00 AM	23.25	21	21.6	27
1112	41	Inbound	7:35:00 AM	10	7.4	10.75	6.5
1113	41	Inbound	8:00:00 AM	24	19.4	22.4	24
1114	41	Inbound	8:05:00 AM	9.2	7.8	9.2	6
1115	41	Inbound	8:30:00 AM	18.25	15.8	21.5	18
1116	41	Inbound	8:35:00 AM	9	7	7.4	12
1117	41	Inbound	9:00:00 AM	16.6	15	13.2	15.5
1118	41	Inbound	9:05:00 AM	5.5	3.8	6.8	8.5
1119	41	Inbound	9:30:00 AM	19.2	10.8	17.8	16.5
1120	41	Inbound	9:32:00 AM	5	4.8	3.5	2.5
1121	41	Inbound	10:00:00 AM	16.75	15.5	17.6	17.5
1122	41	Inbound	10:05:00 AM	9	5.8	7.4	9.5
1123	41	Inbound	10:30:00 AM	14	10.8	14.6	13.5
1124	41	Inbound	10:35:00 AM	8.6	5.6	9.4	11
1125	41	Inbound	11:00:00 AM	13.4	9.2	12.8	15
1126	41	Inbound	11:05:00 AM	9.5	5	7.2	8
1127	41	Inbound	11:30:00 AM	13.2	10.8	16.25	8
1128	41	Inbound	11:35:00 AM	10.5	11.6	8.2	5.5
1129	41	Inbound	12:00:00 PM		10.25	12	14
1130	41	Inbound	12:05:00 PM	10	10.4	12.2	13
1131	41	Inbound	12:30:00 PM	12.4	9	12.5	10.5
1132	41	Inbound	12:35:00 PM	9.4	9.8	9.75	7
1133	41	Inbound	1:00:00 PM	16	9	14.25	10.5
1134	41	Inbound	1:05:00 PM		8	9.5	
1135	41	Inbound	1:30:00 PM	12.2	15.4	15.8	22
1136	41	Inbound	1:35:00 PM	8.4	9.6	13.5	11.5
1137	41	Inbound	2:00:00 PM	12.6	8.25	11.4	6
1138	41	Inbound	2:05:00 PM	20.2	13.8	19.25	22.5
1139	41	Inbound	2:30:00 PM	12.5	12.4	16.8	17
1140	41	Inbound	2:35:00 PM	11.4	9.8	18.6	22
1141	41	Inbound	3:00:00 PM	15	19.75	17.8	16.5
1142	41	Inbound	3:05:00 PM	10.8	19.75	16.2	17
1143	41	Inbound	3:30:00 PM	14	13.4	13	13
1144	41	Inbound	3:35:00 PM	26.25	19.8	23.6	21
1145	41	Inbound	4:00:00 PM	16.6	16	14.4	12.5
1146	41	Inbound	4:05:00 PM	17.75	20.25	15	16.5
1147	41	Inbound	4:30:00 PM	15.8	15.4	15.6	10.5
1148	41	Inbound	4:35:00 PM	23.2	17.8	23.2	21.5
1149	41	Inbound	5:00:00 PM	10.75	11.6	13.33333333	16

	A	B	C	D	E	F	G
3	Average of ons			Week Starting	transit_date_time		
4				3/06/2023	3/13/2023	3/20/2023	3/27/2023
5	current_route	direction	start_time				
1150	41	Inbound	5:05:00 PM	24.6	16.8	25.2	22
1151	41	Inbound	5:30:00 PM	7	10	10.2	11
1152	41	Inbound	5:35:00 PM	13.4	15	20.4	18
1153	41	Inbound	6:00:00 PM	9.8	9	9.333333333	6.5
1154	41	Inbound	6:05:00 PM	12.25	18.2	20	7
1155	41	Inbound	6:35:00 PM	10.5	14.25	12.4	10.5
1156	41	Inbound	7:00:00 PM	9.8	13.5	10.25	12
1157	41	Inbound	8:00:00 PM	5.5	10.2	7.4	5
1158	41	Inbound	8:05:00 PM	17.6	15.25	21	13.5
1159	41	Inbound	10:00:00 PM	4.5	5	4.6	5
1160	41	Inbound	11:05:00 PM	15	12.8	6.25	11.5
1161	41	Inbound	9:05:00 PM	13.25	7	17.8	14
1162	41	Inbound	9:00:00 PM	6.6	7.5	8	9
1163	41	Inbound	11:00:00 PM	3.2	3.75	3.5	4
1164	41	Inbound	7:02:00 PM	12.6	10	12.33333333	11
1165	41	Inbound	10:05:00 PM	8.8	10.25	11.75	9

## Ridership Report by Stop Type

Stop Type	Avg Ons	Avg Offs
Apartments	399	365
Employment	190	232
Grocery	501	479
Hospital	156	88
Medical	319	426
Pharmacy	232	233
Residential Area	910	844
Retail	1026	911
School	1515	1303
Social Services	143	134

## Minority Census Tracts in RTS Fixed Route Service Area, 2023

Census Tract with Minority % Above County Average ☐

Label	Total	White	Non-White	Minority %	Minority Tract
Census Tract 9800, Monroe County, New York	0	0	0	NA	Yes
Census Tract 13, Monroe County, New York	1979	34	1945	98.3%	Yes
Census Tract 27, Monroe County, New York	1320	27	1293	98.0%	Yes
Census Tract 64, Monroe County, New York	2212	52	2160	97.6%	Yes
Census Tract 48, Monroe County, New York	2218	77	2141	96.5%	Yes
Census Tract 75, Monroe County, New York	2674	99	2575	96.3%	Yes
Census Tract 50, Monroe County, New York	1866	75	1791	96.0%	Yes
Census Tract 92, Monroe County, New York	1070	51	1019	95.2%	Yes
Census Tract 52, Monroe County, New York	1315	88	1227	93.3%	Yes
Census Tract 7, Monroe County, New York	1694	115	1579	93.2%	Yes
Census Tract 80, Monroe County, New York	2024	147	1877	92.7%	Yes
Census Tract 49, Monroe County, New York	2346	178	2168	92.4%	Yes
Census Tract 93.01, Monroe County, New York	2119	169	1950	92.0%	Yes
Census Tract 16, Monroe County, New York	2566	230	2336	91.0%	Yes
Census Tract 55, Monroe County, New York	1937	185	1752	90.4%	Yes
Census Tract 51, Monroe County, New York	1311	131	1180	90.0%	Yes
Census Tract 84, Monroe County, New York	3045	327	2718	89.3%	Yes
Census Tract 65, Monroe County, New York	1618	184	1434	88.6%	Yes
Census Tract 59, Monroe County, New York	1540	180	1360	88.3%	Yes
Census Tract 56, Monroe County, New York	2144	251	1893	88.3%	Yes
Census Tract 66, Monroe County, New York	2006	236	1770	88.2%	Yes
Census Tract 39, Monroe County, New York	1707	201	1506	88.2%	Yes
Census Tract 67, Monroe County, New York	3366	429	2937	87.3%	Yes
Census Tract 58, Monroe County, New York	4266	560	3706	86.9%	Yes
Census Tract 79, Monroe County, New York	1869	248	1621	86.7%	Yes
Census Tract 96.02, Monroe County, New York	1628	235	1393	85.6%	Yes
Census Tract 82, Monroe County, New York	3052	444	2608	85.5%	Yes
Census Tract 63, Monroe County, New York	3424	507	2917	85.2%	Yes
Census Tract 57, Monroe County, New York	1369	220	1149	83.9%	Yes
Census Tract 24, Monroe County, New York	3566	609	2957	82.9%	Yes
Census Tract 81, Monroe County, New York	4768	857	3911	82.0%	Yes
Census Tract 41, Monroe County, New York	1489	281	1208	81.1%	Yes
Census Tract 71, Monroe County, New York	3330	643	2687	80.7%	Yes
Census Tract 68, Monroe County, New York	2953	593	2360	79.9%	Yes
Census Tract 69, Monroe County, New York	1944	400	1544	79.4%	Yes
Census Tract 22, Monroe County, New York	3327	704	2623	78.8%	Yes
Census Tract 23, Monroe County, New York	4013	899	3114	77.6%	Yes
Census Tract 54, Monroe County, New York	3664	847	2817	76.9%	Yes


## Minority Census Tracts in RTS Fixed Route Service Area, 2023

Census Tract with Minority % Above County Average ☐

Label	Total	White	Non-White	Minority %	Minority Tract
Census Tract 47.02, Monroe County, New York	2566	601	1965	76.6%	Yes
Census Tract 21, Monroe County, New York	4570	1091	3479	76.1%	Yes
Census Tract 47.01, Monroe County, New York	2757	674	2083	75.6%	Yes
Census Tract 87.02, Monroe County, New York	1472	368	1104	75.0%	Yes
Census Tract 96.05, Monroe County, New York	3053	779	2274	74.5%	Yes
Census Tract 40, Monroe County, New York	1563	420	1143	73.1%	Yes
Census Tract 96.01, Monroe County, New York	1628	443	1185	72.8%	Yes
Census Tract 83.01, Monroe County, New York	4750	1300	3450	72.6%	Yes
Census Tract 2, Monroe County, New York	2136	610	1526	71.4%	Yes
Census Tract 62, Monroe County, New York	2686	913	1773	66.0%	Yes
Census Tract 19, Monroe County, New York	2897	1038	1859	64.2%	Yes
Census Tract 88.01, Monroe County, New York	6372	2335	4037	63.4%	Yes
Census Tract 20, Monroe County, New York	5267	1939	3328	63.2%	Yes
Census Tract 46.02, Monroe County, New York	1860	720	1140	61.3%	Yes
Census Tract 18, Monroe County, New York	4875	1999	2876	59.0%	Yes
Census Tract 38.06, Monroe County, New York	4905	2293	2612	53.3%	Yes
Census Tract 70, Monroe County, New York	2966	1488	1478	49.8%	Yes
Census Tract 32, Monroe County, New York	1816	980	836	46.0%	Yes
Census Tract 95, Monroe County, New York	3279	1804	1475	45.0%	Yes
Census Tract 33, Monroe County, New York	1575	901	674	42.8%	Yes
Census Tract 109.01, Monroe County, New York	4132	2370	1762	42.6%	Yes
Census Tract 130.05, Monroe County, New York	5136	2947	2189	42.6%	Yes
Census Tract 60, Monroe County, New York	3360	1991	1369	40.7%	Yes
Census Tract 143.01, Monroe County, New York	2760	1716	1044	37.8%	Yes
Census Tract 136.04, Monroe County, New York	6178	3859	2319	37.5%	Yes
Census Tract 94.01, Monroe County, New York	2096	1325	771	36.8%	Yes
Census Tract 130.06, Monroe County, New York	2353	1518	835	35.5%	
Census Tract 131.04, Monroe County, New York	4253	2753	1500	35.3%	
Census Tract 86, Monroe County, New York	4291	2780	1511	35.2%	
Census Tract 109.02, Monroe County, New York	3516	2295	1221	34.7%	
Census Tract 144, Monroe County, New York	5047	3310	1737	34.4%	
Census Tract 146.02, Monroe County, New York	5158	3405	1753	34.0%	
Census Tract 38.07, Monroe County, New York	4362	2961	1401	32.1%	
Census Tract 94.04, Monroe County, New York	295	201	94	31.9%	
Census Tract 30, Monroe County, New York	2247	1534	713	31.7%	
Census Tract 85, Monroe County, New York	3457	2361	1096	31.7%	
Census Tract 77, Monroe County, New York	2626	1798	828	31.5%	
Census Tract 106.02, Monroe County, New York	3981	2763	1218	30.6%	
Census Tract 131.01, Monroe County, New York	7153	5016	2137	29.9%	
Census Tract 131.03, Monroe County, New York	7013	4921	2092	29.8%	



## Minority Census Tracts in RTS Fixed Route Service Area, 2023

Census Tract with Minority % Above County Average 


Label	Total	White	Non-White	Minority %	Minority Tract
Census Tract 130.04, Monroe County, New York	5285	3715	1570	29.7%	
Census Tract 141.02, Monroe County, New York	3602	2545	1057	29.3%	
Census Tract 138, Monroe County, New York	5847	4153	1694	29.0%	
Census Tract 110, Monroe County, New York	4774	3465	1309	27.4%	
Census Tract 93.02, Monroe County, New York	2116	1546	570	26.9%	
Census Tract 130.03, Monroe County, New York	1472	1077	395	26.8%	
Census Tract 34, Monroe County, New York	2522	1847	675	26.8%	
Census Tract 94.02, Monroe County, New York	1600	1179	421	26.3%	
Census Tract 111, Monroe County, New York	4582	3404	1178	25.7%	
Census Tract 10, Monroe County, New York	3793	2819	974	25.7%	
Census Tract 136.01, Monroe County, New York	4101	3059	1042	25.4%	
Census Tract 36, Monroe County, New York	2762	2068	694	25.1%	
Census Tract 104, Monroe County, New York	5243	3933	1310	25.0%	
Census Tract 140.04, Monroe County, New York	4050	3044	1006	24.8%	
Census Tract 140.03, Monroe County, New York	4731	3582	1149	24.3%	
Census Tract 145.04, Monroe County, New York	5676	4321	1355	23.9%	
Census Tract 106.01, Monroe County, New York	2777	2118	659	23.7%	
Census Tract 128, Monroe County, New York	4583	3572	1011	22.1%	
Census Tract 76, Monroe County, New York	2879	2248	631	21.9%	
Census Tract 139.01, Monroe County, New York	4061	3175	886	21.8%	
Census Tract 127, Monroe County, New York	3815	2994	821	21.5%	
Census Tract 142.04, Monroe County, New York	2289	1800	489	21.4%	
Census Tract 120, Monroe County, New York	2623	2064	559	21.3%	
Census Tract 119.01, Monroe County, New York	5977	4718	1259	21.1%	
Census Tract 129, Monroe County, New York	5368	4238	1130	21.1%	
Census Tract 145.03, Monroe County, New York	3249	2572	677	20.8%	
Census Tract 140.01, Monroe County, New York	4991	3979	1012	20.3%	
Census Tract 116.05, Monroe County, New York	2172	1754	418	19.2%	
Census Tract 142.05, Monroe County, New York	3095	2504	591	19.1%	
Census Tract 152, Monroe County, New York	6872	5562	1310	19.1%	
Census Tract 141.03, Monroe County, New York	4442	3596	846	19.0%	
Census Tract 135.07, Monroe County, New York	6271	5078	1193	19.0%	
Census Tract 142.02, Monroe County, New York	7075	5758	1317	18.6%	
Census Tract 37, Monroe County, New York	2836	2328	508	17.9%	
Census Tract 137.02, Monroe County, New York	3885	3253	632	16.3%	
Census Tract 122.01, Monroe County, New York	6105	5131	974	16.0%	
Census Tract 125, Monroe County, New York	4312	3634	678	15.7%	
Census Tract 123.01, Monroe County, New York	5990	5070	920	15.4%	
Census Tract 116.03, Monroe County, New York	1199	1017	182	15.2%	
Census Tract 29, Monroe County, New York	4104	3505	599	14.6%	
Census Tract 141.04, Monroe County, New York	3802	3264	538	14.2%	
Census Tract 35, Monroe County, New York	1719	1492	227	13.2%	
Census Tract 122.02, Monroe County, New York	3722	3251	471	12.7%	

## Minority Census Tracts in RTS Fixed Route Service Area, 2023

Census Tract with Minority % Above County Average ☐


Label	Total	White	Non-White	Minority %	Minority Tract
Census Tract 61, Monroe County, New York	2200	1922	278	12.6%	
Census Tract 31.01, Monroe County, New York	2545	2234	311	12.2%	
Census Tract 78.01, Monroe County, New York	2467	2174	293	11.9%	
Census Tract 116.01, Monroe County, New York	5469	4858	611	11.2%	
Census Tract 117.12, Monroe County, New York	5343	4755	588	11.0%	
Census Tract 136.03, Monroe County, New York	5157	4599	558	10.8%	
Census Tract 117.08, Monroe County, New York	3612	3228	384	10.6%	
Census Tract 126, Monroe County, New York	4662	4182	480	10.3%	
Census Tract 78.02, Monroe County, New York	1576	1415	161	10.2%	
Census Tract 135.08, Monroe County, New York	4023	3614	409	10.2%	
Census Tract 103, Monroe County, New York	3990	3592	398	10.0%	
Census Tract 146.01, Monroe County, New York	5516	5009	507	9.2%	
Census Tract 117.07, Monroe County, New York	6866	6263	603	8.8%	
Census Tract 117.05, Monroe County, New York	2191	2000	191	8.7%	
Census Tract 116.04, Monroe County, New York	2699	2470	229	8.5%	
Census Tract 143.02, Monroe County, New York	5220	4818	402	7.7%	
Census Tract 117.11, Monroe County, New York	1821	1683	138	7.6%	
Census Tract 145.01, Monroe County, New York	5010	4670	340	6.8%	
Census Tract 148.05, Monroe County, New York	3397	3173	224	6.6%	
Census Tract 31.02, Monroe County, New York	2035	1903	132	6.5%	
Census Tract 119.04, Monroe County, New York	4153	3897	256	6.2%	
Census Tract 121, Monroe County, New York	3725	3510	215	5.8%	
Census Tract 115.03, Monroe County, New York	5498	5181	317	5.8%	
Census Tract 115.07, Monroe County, New York	4497	4240	257	5.7%	
Census Tract 118, Monroe County, New York	5487	5197	290	5.3%	
Census Tract 151.01, Monroe County, New York	4938	4684	254	5.1%	
Census Tract 105, Monroe County, New York	4462	4329	133	3.0%	
Census Tract 151.02, Monroe County, New York	3832	3736	96	2.5%	
Census Tract 148.02, Monroe County, New York	5625	5507	118	2.1%	
Census Tract 9802, Monroe County, New York	21	21	0	0.0%	

## Low-Income Census Tracts in RTS Fixed Route Service Area, 2023

Census Tract with Low Income % Above County Average 


Tract	Total	Low Income	Low Income %
Census Tract 9800, Monroe County, New York	0	0	NA
Census Tract 9802, Monroe County, New York	21	21	100.0%
Census Tract 49, Monroe County, New York	2329	1479	63.5%
Census Tract 65, Monroe County, New York	1618	1001	61.9%
Census Tract 92, Monroe County, New York	1070	639	59.7%
Census Tract 96.05, Monroe County, New York	3053	1683	55.1%
Census Tract 51, Monroe County, New York	1311	665	50.7%
Census Tract 2, Monroe County, New York	2131	1067	50.1%
Census Tract 87.02, Monroe County, New York	1472	734	49.9%
Census Tract 56, Monroe County, New York	2144	1050	49.0%
Census Tract 27, Monroe County, New York	1320	644	48.8%
Census Tract 16, Monroe County, New York	2526	1228	48.6%
Census Tract 96.02, Monroe County, New York	1614	765	47.4%
Census Tract 79, Monroe County, New York	1869	862	46.1%
Census Tract 55, Monroe County, New York	1859	836	45.0%
Census Tract 38.06, Monroe County, New York	3708	1652	44.6%
Census Tract 58, Monroe County, New York	4266	1895	44.4%
Census Tract 40, Monroe County, New York	1448	628	43.4%
Census Tract 50, Monroe County, New York	1854	803	43.3%
Census Tract 24, Monroe County, New York	3553	1504	42.3%
Census Tract 70, Monroe County, New York	2966	1242	41.9%
Census Tract 47.01, Monroe County, New York	2757	1152	41.8%
Census Tract 23, Monroe County, New York	3979	1637	41.1%
Census Tract 84, Monroe County, New York	3027	1242	41.0%
Census Tract 39, Monroe County, New York	1707	688	40.3%
Census Tract 41, Monroe County, New York	1489	578	38.8%
Census Tract 69, Monroe County, New York	1850	704	38.1%
Census Tract 33, Monroe County, New York	1575	598	38.0%
Census Tract 93.01, Monroe County, New York	2062	755	36.6%
Census Tract 96.01, Monroe County, New York	1628	592	36.4%
Census Tract 52, Monroe County, New York	1315	478	36.3%
Census Tract 95, Monroe County, New York	3224	1169	36.3%
Census Tract 71, Monroe County, New York	3330	1162	34.9%
Census Tract 13, Monroe County, New York	1968	679	34.5%
Census Tract 21, Monroe County, New York	4458	1519	34.1%
Census Tract 66, Monroe County, New York	2006	683	34.0%
Census Tract 80, Monroe County, New York	2024	688	34.0%
Census Tract 46.02, Monroe County, New York	1855	618	33.3%
Census Tract 19, Monroe County, New York	2897	956	33.0%
Census Tract 131.03, Monroe County, New York	2601	830	31.9%
Census Tract 7, Monroe County, New York	1694	540	31.9%
Census Tract 32, Monroe County, New York	1811	577	31.9%
Census Tract 48, Monroe County, New York	2205	689	31.2%
Census Tract 82, Monroe County, New York	3052	923	30.2%
Census Tract 88.01, Monroe County, New York	6368	1912	30.0%
Census Tract 67, Monroe County, New York	3366	998	29.6%
Census Tract 94.01, Monroe County, New York	1806	522	28.9%
Census Tract 22, Monroe County, New York	3206	879	27.4%
Census Tract 57, Monroe County, New York	1369	372	27.2%
Census Tract 81, Monroe County, New York	4642	1255	27.0%
Census Tract 30, Monroe County, New York	2223	586	26.4%

## Low-Income Census Tracts in RTS Fixed Route Service Area, 2023

Census Tract with Low Income % Above County Average 

Tract	Total	Low Income	Low Income %
Census Tract 59, Monroe County, New York	1540	404	26.2%
Census Tract 63, Monroe County, New York	3329	808	24.3%
Census Tract 109.02, Monroe County, New York	3516	837	23.8%
Census Tract 94.04, Monroe County, New York	295	69	23.4%
Census Tract 10, Monroe County, New York	3346	782	23.4%
Census Tract 20, Monroe County, New York	5251	1223	23.3%
Census Tract 83.01, Monroe County, New York	4737	1079	22.8%
Census Tract 131.04, Monroe County, New York	4247	964	22.7%
Census Tract 140.04, Monroe County, New York	4031	914	22.7%
Census Tract 75, Monroe County, New York	2674	592	22.1%
Census Tract 54, Monroe County, New York	3649	789	21.6%
Census Tract 93.02, Monroe County, New York	2116	440	20.8%
Census Tract 130.06, Monroe County, New York	2335	485	20.8%
Census Tract 85, Monroe County, New York	3256	666	20.5%
Census Tract 136.04, Monroe County, New York	6140	1243	20.2%
Census Tract 77, Monroe County, New York	2567	513	20.0%
Census Tract 138, Monroe County, New York	5847	1138	19.5%
Census Tract 34, Monroe County, New York	2512	467	18.6%
Census Tract 64, Monroe County, New York	2198	402	18.3%
Census Tract 47.02, Monroe County, New York	2565	465	18.1%
Census Tract 116.03, Monroe County, New York	1193	212	17.8%
Census Tract 68, Monroe County, New York	2929	512	17.5%
Census Tract 86, Monroe County, New York	4219	716	17.0%
Census Tract 141.02, Monroe County, New York	3602	572	15.9%
Census Tract 141.04, Monroe County, New York	3681	583	15.8%
Census Tract 31.02, Monroe County, New York	2035	315	15.5%
Census Tract 62, Monroe County, New York	2663	393	14.8%
Census Tract 94.02, Monroe County, New York	1600	235	14.7%
Census Tract 109.01, Monroe County, New York	3289	483	14.7%
Census Tract 106.01, Monroe County, New York	2746	389	14.2%
Census Tract 78.01, Monroe County, New York	2467	347	14.1%
Census Tract 151.02, Monroe County, New York	3832	527	13.8%
Census Tract 18, Monroe County, New York	4875	648	13.3%
Census Tract 29, Monroe County, New York	3965	499	12.6%
Census Tract 146.02, Monroe County, New York	5130	630	12.3%
Census Tract 60, Monroe County, New York	3360	412	12.3%
Census Tract 148.05, Monroe County, New York	3397	413	12.2%
Census Tract 137.02, Monroe County, New York	3861	469	12.1%
Census Tract 119.01, Monroe County, New York	5831	706	12.1%
Census Tract 130.05, Monroe County, New York	2927	354	12.1%
Census Tract 128, Monroe County, New York	4583	550	12.0%
Census Tract 104, Monroe County, New York	5231	605	11.6%
Census Tract 118, Monroe County, New York	5487	623	11.4%
Census Tract 116.05, Monroe County, New York	2122	233	11.0%
Census Tract 143.02, Monroe County, New York	5192	557	10.7%
Census Tract 120, Monroe County, New York	2569	270	10.5%
Census Tract 143.01, Monroe County, New York	2746	284	10.3%
Census Tract 152, Monroe County, New York	6587	673	10.2%
Census Tract 31.01, Monroe County, New York	2527	256	10.1%
Census Tract 125, Monroe County, New York	4312	432	10.0%
Census Tract 131.01, Monroe County, New York	7141	707	9.9%

## Low-Income Census Tracts in RTS Fixed Route Service Area, 2023

Census Tract with Low Income % Above County Average 

Tract	Total	Low Income	Low Income %
Census Tract 130.04, Monroe County, New York	5248	480	9.1%
Census Tract 61, Monroe County, New York	2200	183	8.3%
Census Tract 38.07, Monroe County, New York	1273	103	8.1%
Census Tract 121, Monroe County, New York	3725	301	8.1%
Census Tract 139.01, Monroe County, New York	4061	327	8.1%
Census Tract 36, Monroe County, New York	2762	220	8.0%
Census Tract 145.03, Monroe County, New York	3231	251	7.8%
Census Tract 106.02, Monroe County, New York	3930	297	7.6%
Census Tract 122.01, Monroe County, New York	3553	267	7.5%
Census Tract 126, Monroe County, New York	4481	318	7.1%
Census Tract 142.04, Monroe County, New York	2278	157	6.9%
Census Tract 144, Monroe County, New York	4926	330	6.7%
Census Tract 116.04, Monroe County, New York	2677	175	6.5%
Census Tract 105, Monroe County, New York	4462	290	6.5%
Census Tract 145.01, Monroe County, New York	5010	324	6.5%
Census Tract 111, Monroe County, New York	4582	293	6.4%
Census Tract 141.03, Monroe County, New York	4442	251	5.7%
Census Tract 136.01, Monroe County, New York	4083	230	5.6%
Census Tract 117.11, Monroe County, New York	1750	97	5.5%
Census Tract 135.07, Monroe County, New York	6262	344	5.5%
Census Tract 76, Monroe County, New York	2879	147	5.1%
Census Tract 117.12, Monroe County, New York	5281	269	5.1%
Census Tract 116.01, Monroe County, New York	5310	265	5.0%
Census Tract 140.03, Monroe County, New York	4696	231	4.9%
Census Tract 148.02, Monroe County, New York	5625	271	4.8%
Census Tract 151.01, Monroe County, New York	4887	223	4.6%
Census Tract 142.02, Monroe County, New York	7075	315	4.5%
Census Tract 140.01, Monroe County, New York	4991	210	4.2%
Census Tract 117.07, Monroe County, New York	6861	285	4.2%
Census Tract 136.03, Monroe County, New York	4890	203	4.2%
Census Tract 123.01, Monroe County, New York	5990	247	4.1%
Census Tract 129, Monroe County, New York	5319	210	3.9%
Census Tract 127, Monroe County, New York	3814	149	3.9%
Census Tract 37, Monroe County, New York	2680	102	3.8%
Census Tract 146.01, Monroe County, New York	5509	201	3.6%
Census Tract 78.02, Monroe County, New York	1576	56	3.6%
Census Tract 115.07, Monroe County, New York	4491	124	2.8%
Census Tract 103, Monroe County, New York	3988	108	2.7%
Census Tract 117.05, Monroe County, New York	2148	57	2.7%
Census Tract 110, Monroe County, New York	4725	124	2.6%
Census Tract 135.08, Monroe County, New York	4023	105	2.6%
Census Tract 119.04, Monroe County, New York	4153	108	2.6%
Census Tract 115.03, Monroe County, New York	5189	122	2.4%
Census Tract 142.05, Monroe County, New York	3094	64	2.1%
Census Tract 122.02, Monroe County, New York	3578	70	2.0%
Census Tract 145.04, Monroe County, New York	5676	101	1.8%
Census Tract 117.08, Monroe County, New York	3600	51	1.4%
Census Tract 35, Monroe County, New York	1073	13	1.2%

# Maps

## **RTS Fixed Route Network System Map**

- Above Average Minority Population by Census Tract
- Above Average Minority Population and Fixed Transit Facilities
- Above Average Poverty by Census Tract
- Above Average Low-Income Population and Fixed Transit Facilities

## **Fixed Transit Facilities Recently or Scheduled to be Replaced**

## **RTS On Demand Zones and Connection Hub Map**

- Above Average Minority Population and Connection Hubs
- Above Average Low-Income Population and Connection Hubs

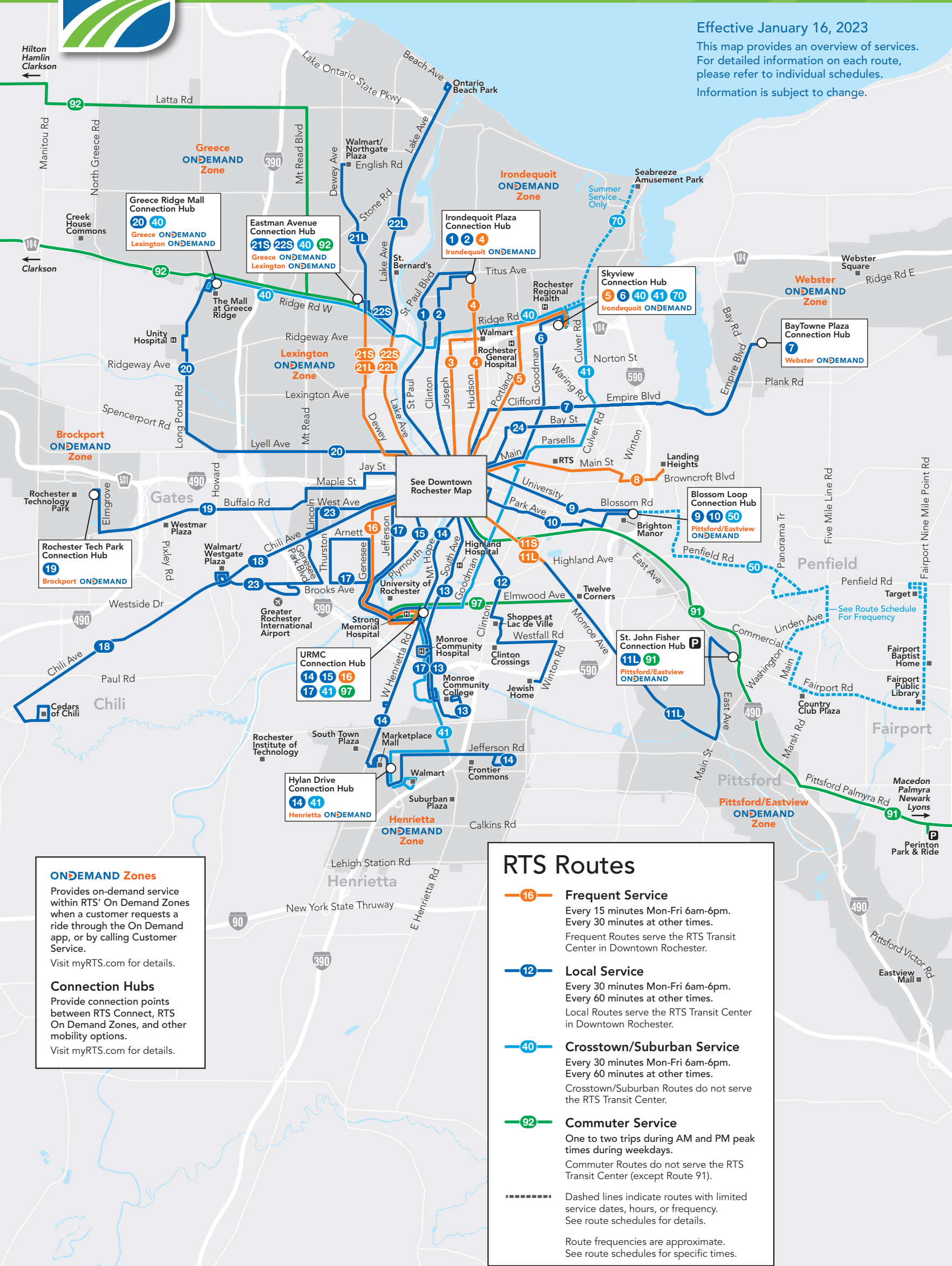




# System Map Monroe County

Effective January 16, 2023

This map provides an overview of services. For detailed information on each route, please refer to individual schedules. Information is subject to change.



**ONDEMAND Zones**  
Provides on-demand service within RTS' On Demand Zones when a customer requests a ride through the On Demand app, or by calling Customer Service.  
Visit [myRTS.com](http://myRTS.com) for details.

**Connection Hubs**  
Provide connection points between RTS Connect, RTS On Demand Zones, and other mobility options.  
Visit [myRTS.com](http://myRTS.com) for details.

### RTS Routes

- 16 Frequent Service**  
Every 15 minutes Mon-Fri 6am-6pm.  
Every 30 minutes at other times.  
Frequent Routes serve the RTS Transit Center in Downtown Rochester.
- 12 Local Service**  
Every 30 minutes Mon-Fri 6am-6pm.  
Every 60 minutes at other times.  
Local Routes serve the RTS Transit Center in Downtown Rochester.
- 40 Crosstown/Suburban Service**  
Every 30 minutes Mon-Fri 6am-6pm.  
Every 60 minutes at other times.  
Crosstown/Suburban Routes do not serve the RTS Transit Center.
- 92 Commuter Service**  
One to two trips during AM and PM peak times during weekdays.  
Commuter Routes do not serve the RTS Transit Center (except Route 91).

----- Dashed lines indicate routes with limited service dates, hours, or frequency. See route schedules for details.

Route frequencies are approximate. See route schedules for specific times.



Questions?

585-288-1700  
myRTS.com/Contact-Us  
Visit an RTS Transit Center Info Desk

Customer Service Hours  
RTS Call Center: 6am – 7pm, 7 days a week  
RTS Transit Center Service Desk:  
6am – 7pm, Mon – Fri  
8am – 5pm, Sat/Sun

Para atención en español, por favor llamar al (585) 288-1700

RTS Connect Fares

Frequent, Local, Crosstown/Suburban and Commuter Routes

Adults	\$1.00
Reduced Fares	\$ .50

RTS On Demand Fares

One ride within one On Demand Zone	Adult	Reduced Fares
to/from RTS bus stop or Connection Hub	\$1.00	\$ .50
Curb-to-Curb ride	\$3.00	\$1.50

Reduced Fares:  
• Children age 6 -11  
• Seniors age 65 and above  
• People with disabilities  
Customers receiving reduced fares may be asked to show a government-issued ID or Medicare card when boarding.

Unlimited Fares with RTS Go

RTS Connect routes and/or On Demand service. Must use RTS Go card or app (regular fare is applied until this maximum amount is reached).

All-Day	Adults	\$3.00
	Reduced Fares	\$1.50
31-Day	Adults	\$56
	Reduced Fares	\$28

Children

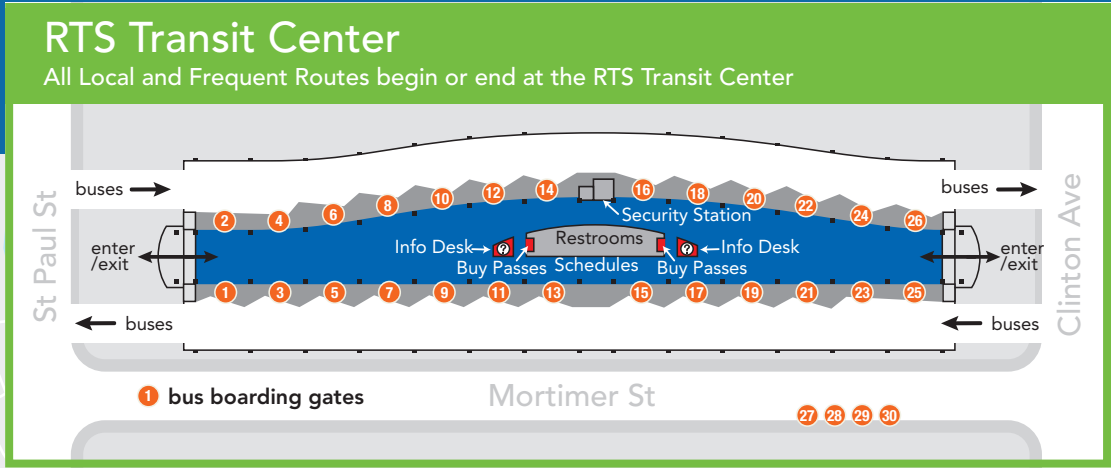
Children age 5 and under ride free (limit 3 per adult). Children age 10 and under must be accompanied by an adult.

Veterans

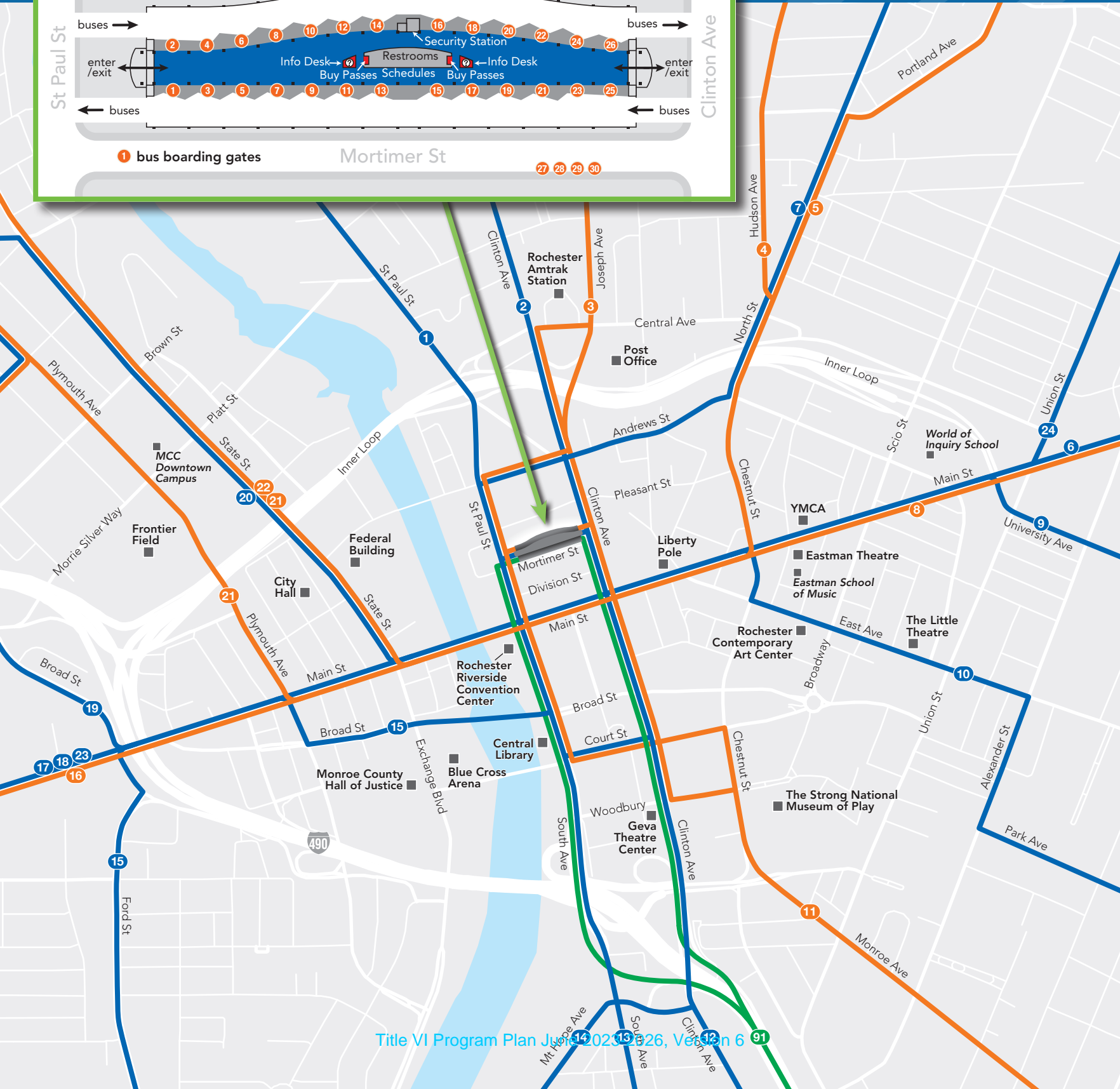
Veterans ride free on all RTS Connect routes and On Demand service. To receive free service, veterans are required to use the Veterans Outreach Center-issued bus pass. Visit vocroc.org/rtf for details.

RTS Access Customers

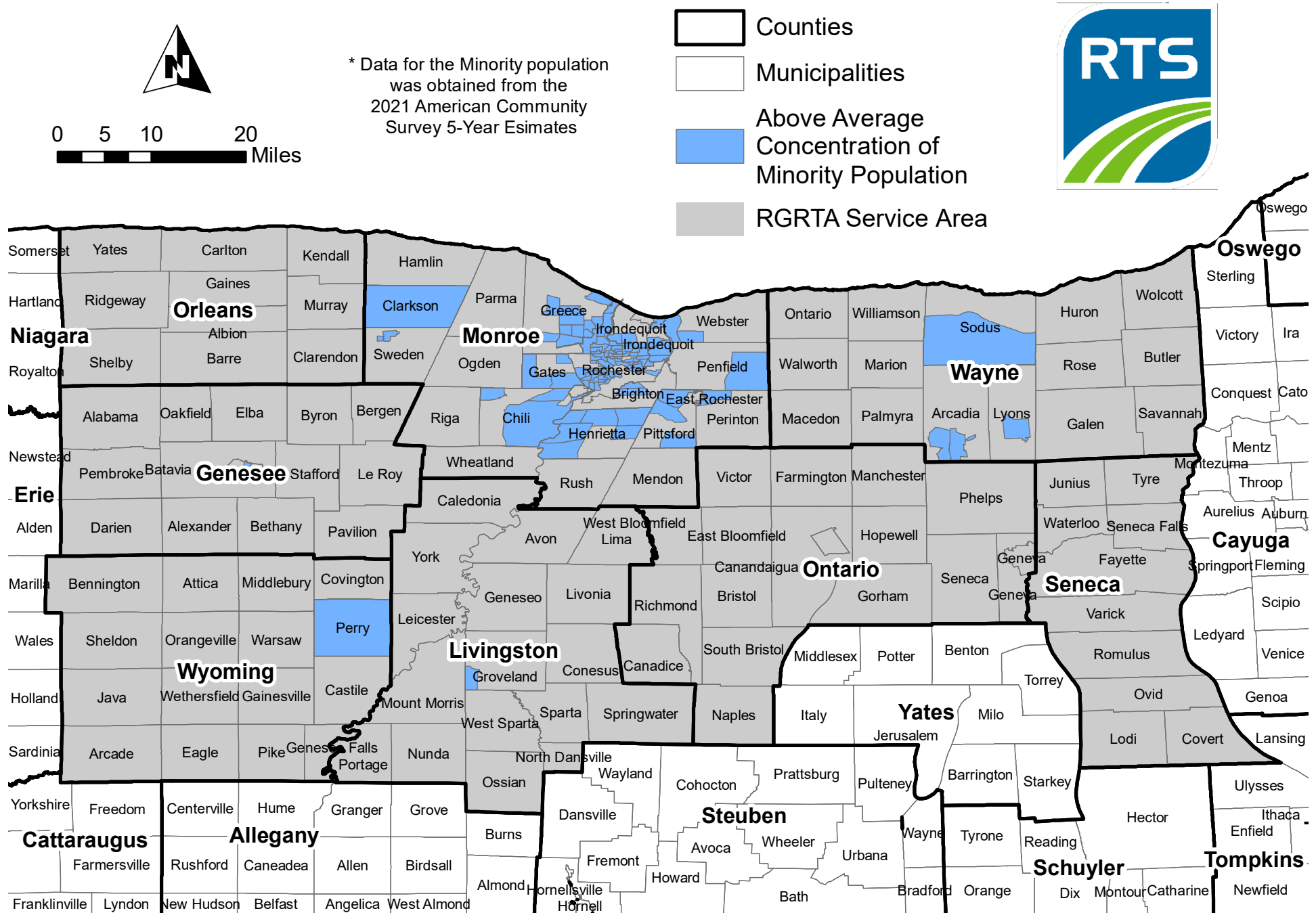
RTS Access customers ride free on all RTS Connect routes and On Demand service. RTS Access customers are required to show their RTS Access ID card.



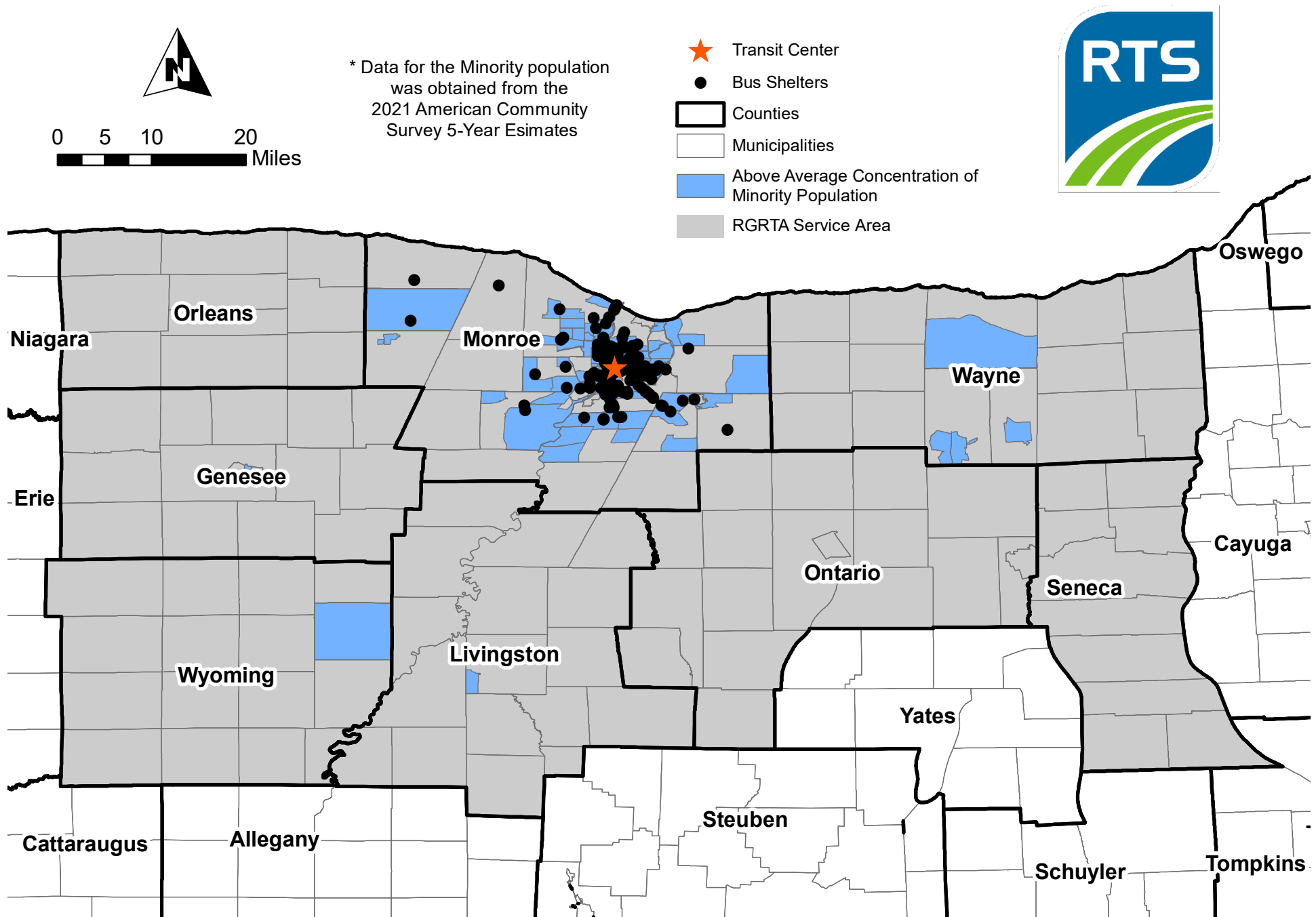
Downtown Rochester



# Above Average Minority Population by Census Tract\*

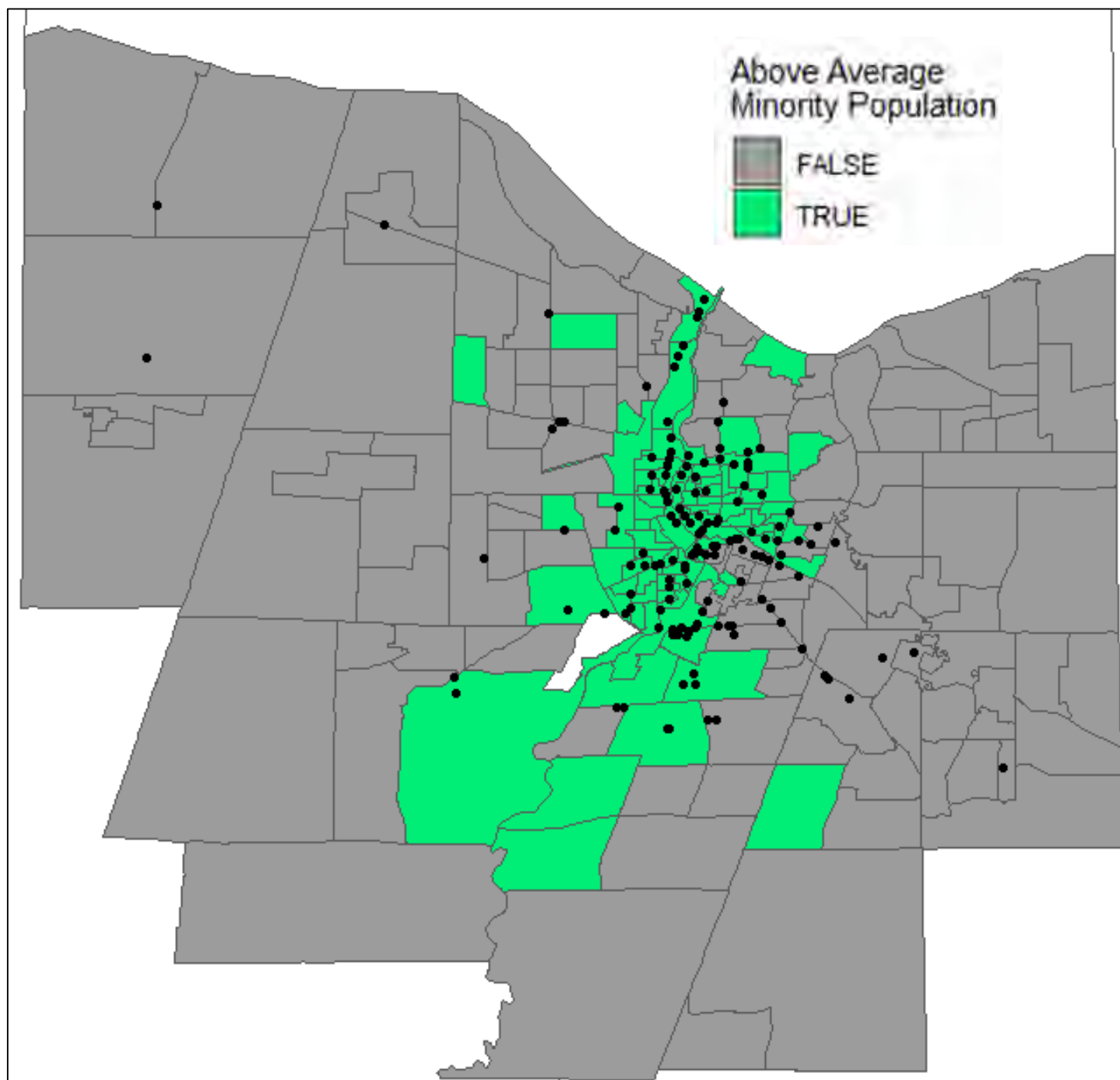


# Above Average Minority Population and Fixed Transit Facilities\*





## Above Average Minority Population and Fixed Transit Facilities





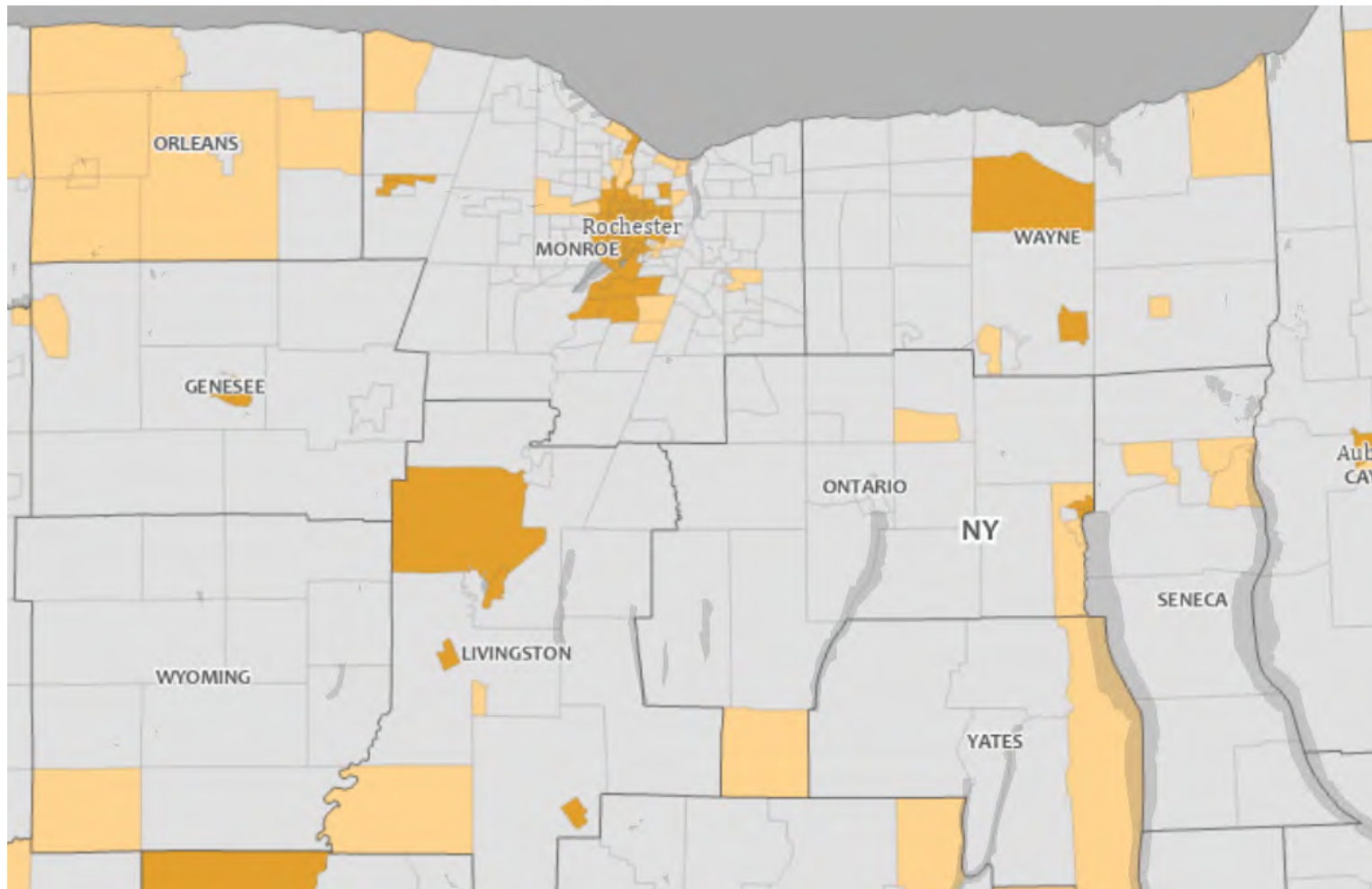
## Above Average Low-Income (Poverty) Population by Census Tract\*



\* Data for the Low-Income (Poverty) populations was obtained from the Census Poverty Status Viewer and is based on data from the 2015-2019 American Community Survey 5-Year Estimates

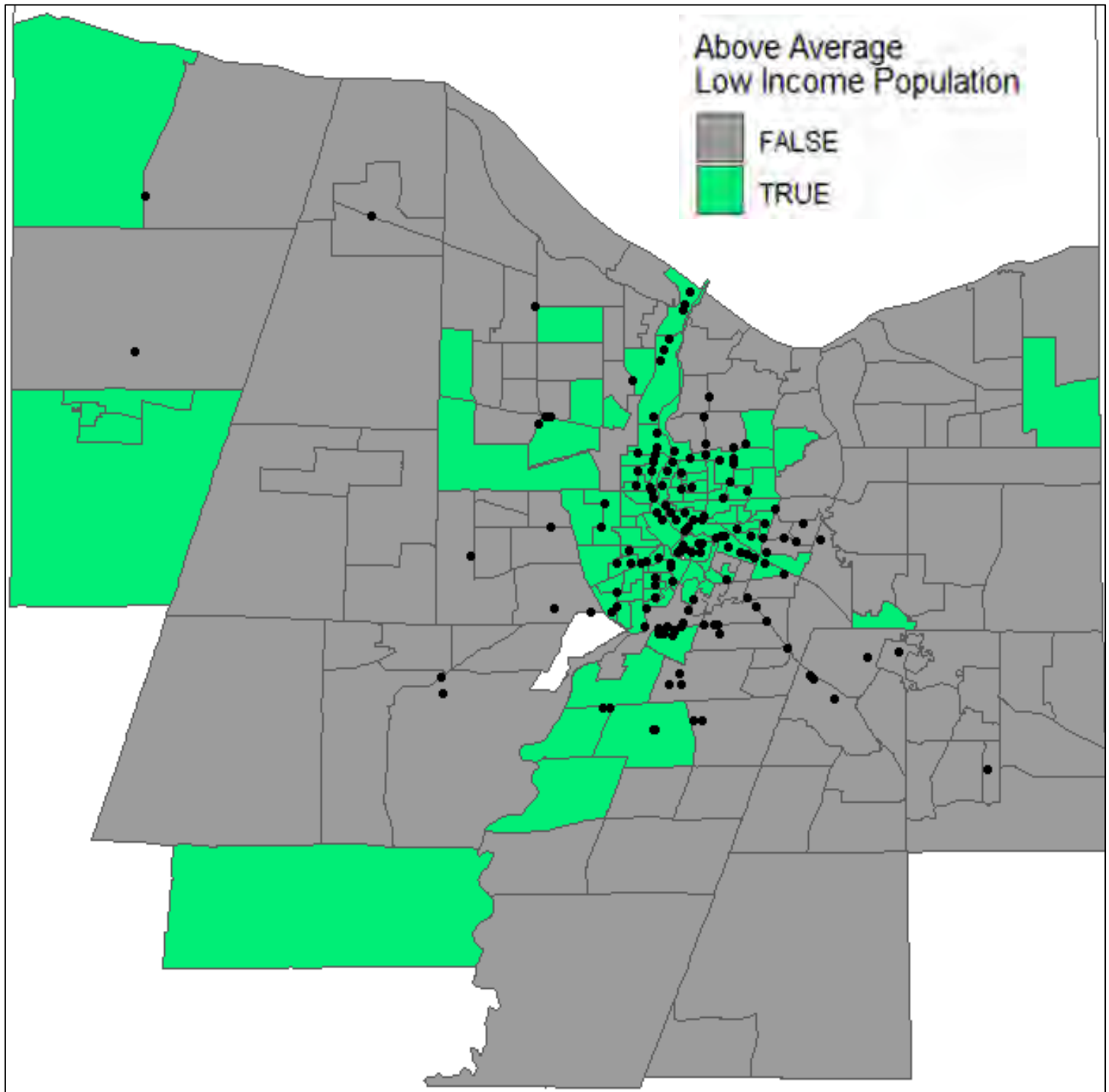
### Poverty Status

-  **High poverty area**  
20% of the population or more are below the poverty level
-  **Possible high poverty area**  
The confidence interval includes "20% of the population or more are below the poverty level," but the point estimate is lower than that threshold

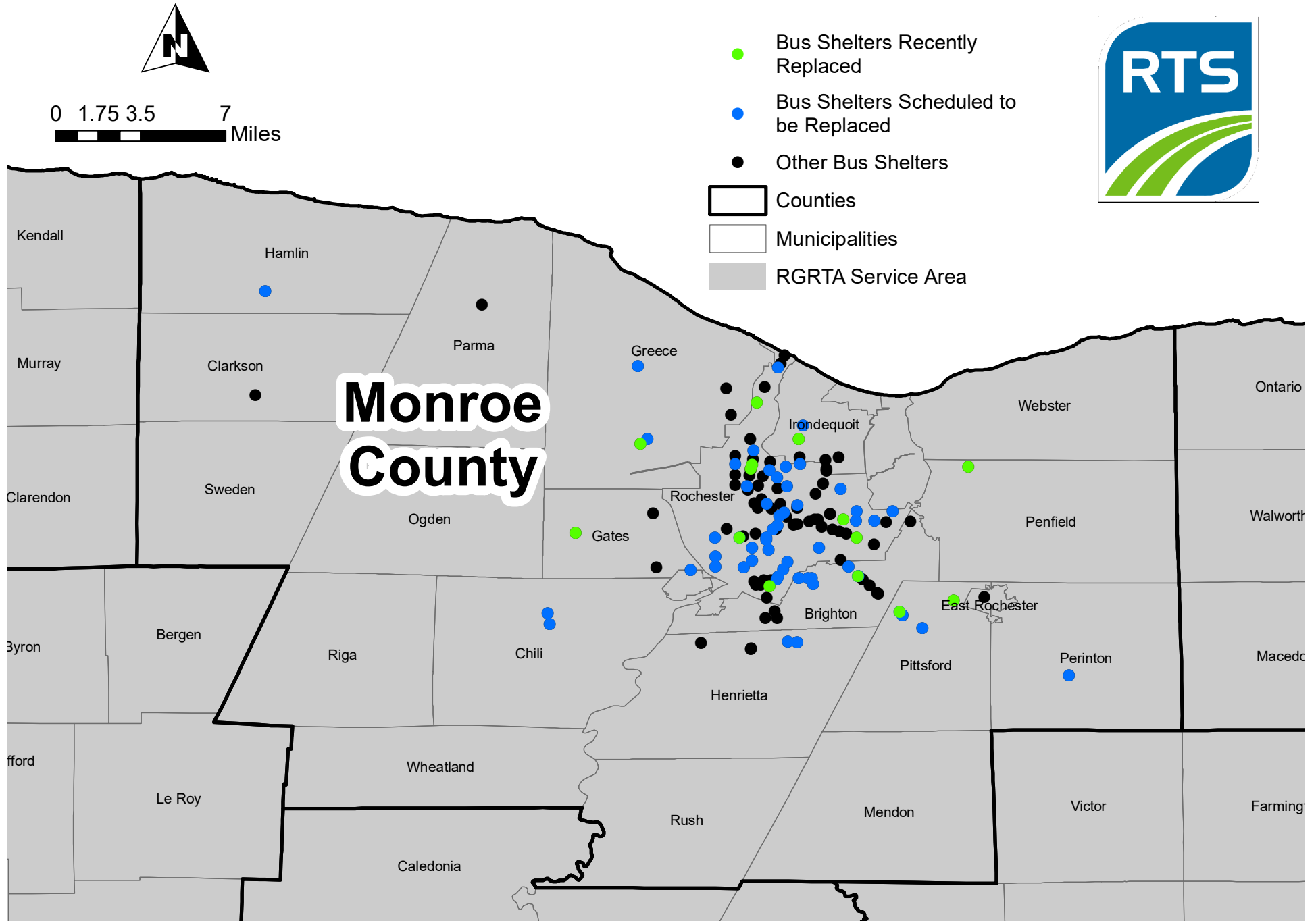




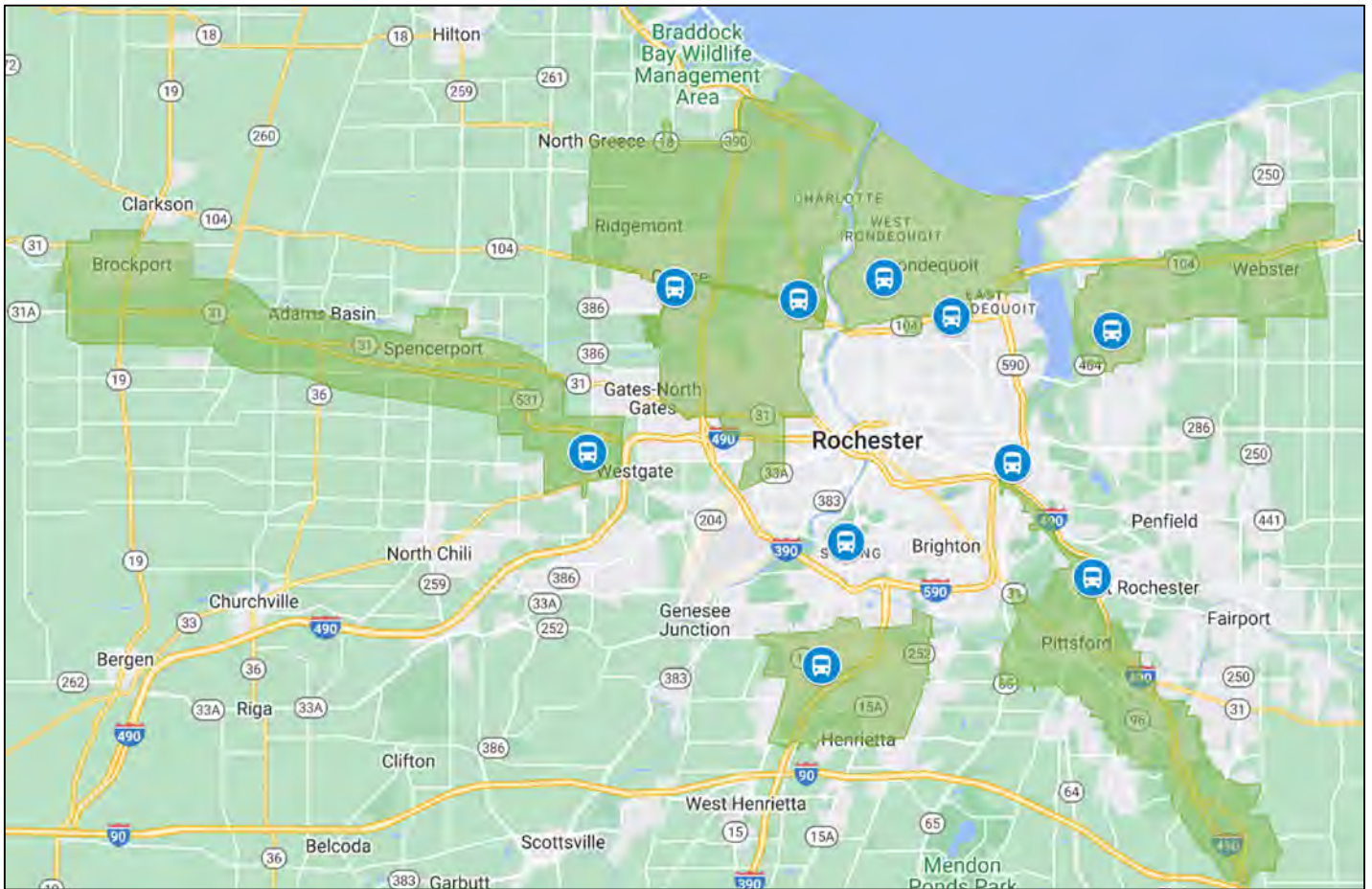
# Above Average Low-Income Population and Fixed Transit Facilities



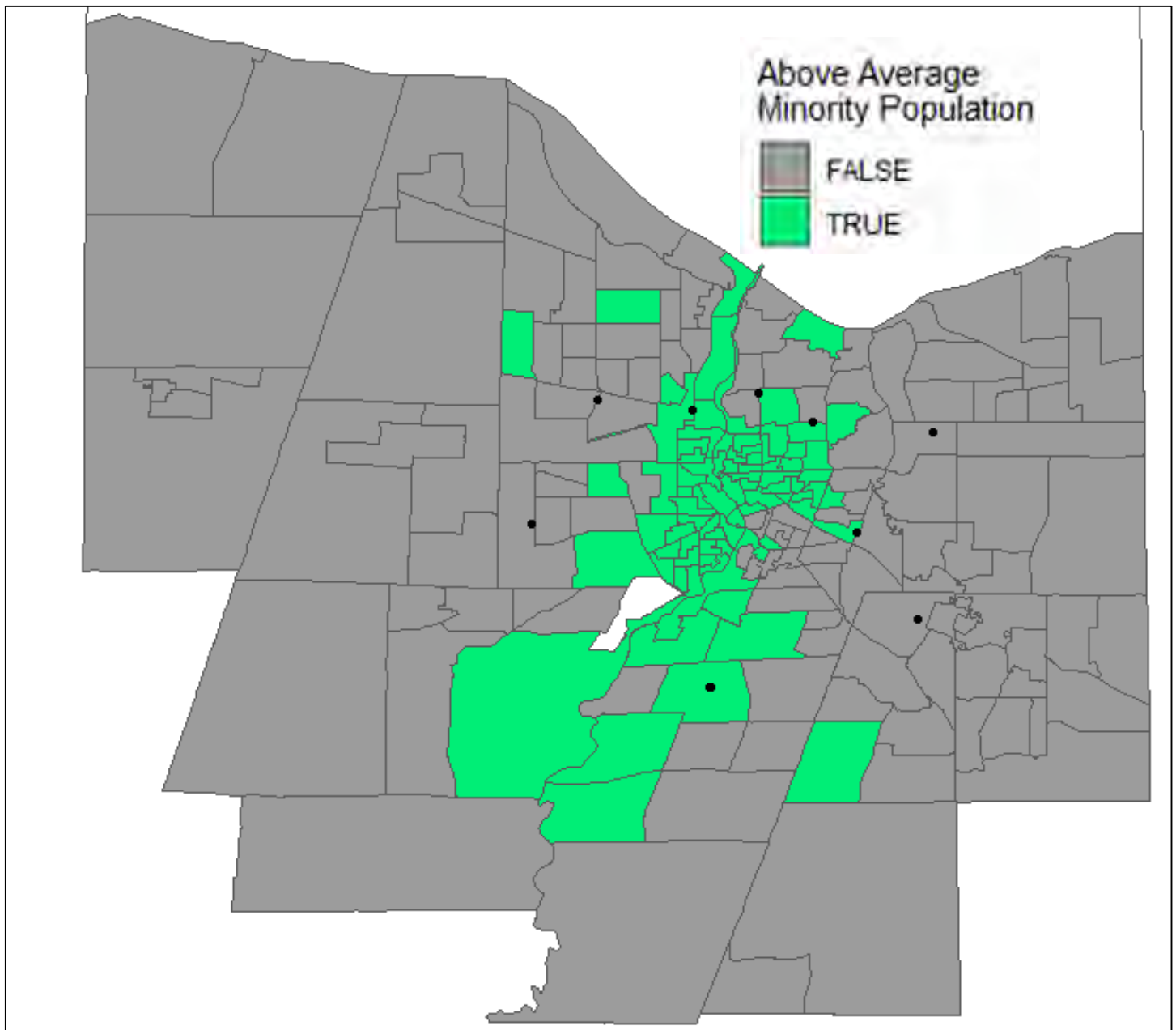
# Fixed Transit Facilities Recently or Scheduled to be Replaced



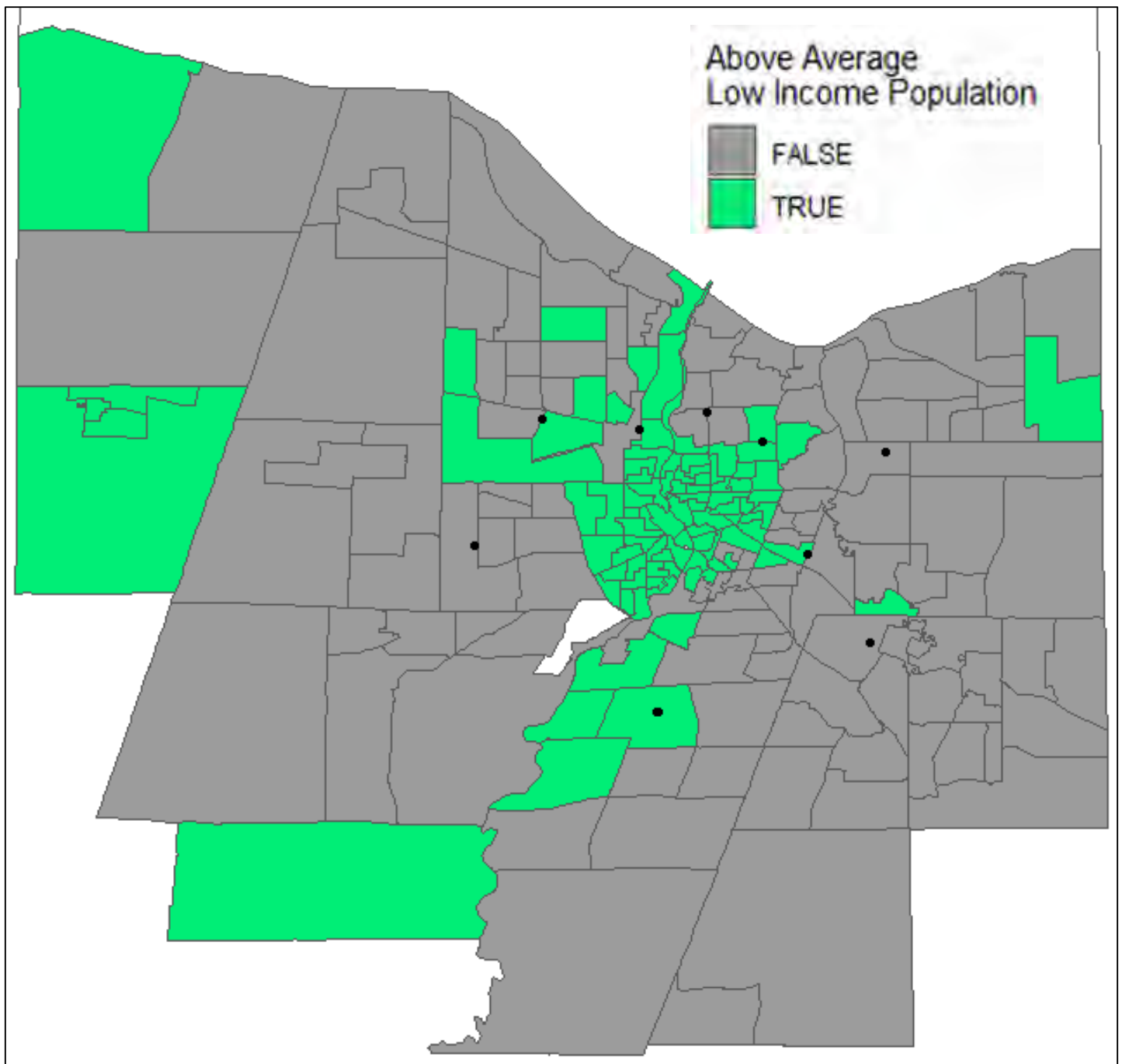
## RTS On Demand Zones and Connection Hubs



# Above Average Minority Population and Connection Hubs



# Above Average Low-Income Population and Connection Hubs



# Survey Report Samples

RTS Onboard Survey Questions, Wave 49

Level7 Onboard Customer Survey reports (November 2022)\*

ABBG customer survey reports (August 2022)\*

*\*The reports are abbreviated to reflect a sample of the material and reduce the page count of the exhibit. We can provide the reports in their entirety upon request.*



Route #: \_\_\_\_\_ Interviewer Initials: \_\_\_\_\_ Date: \_\_\_\_/\_\_\_\_/\_\_\_\_ Time: \_\_\_\_:\_\_\_\_ AM / PM

## Instructions

Please answer ALL questions on the front and back of this survey. Return the finished survey to the interviewer to receive a bus pass. Whether your input is positive or negative, it will be welcome and appreciated. Thank you for your participation!

- 1)** All things considered, how likely would you be to recommend riding the RTS bus to a friend or neighbor? Please circle one.
- |  |                   |   |   |   |   |   |   |   |   |   |    |                  |
|--|-------------------|---|---|---|---|---|---|---|---|---|----|------------------|
|  | Not at All Likely |   |   |   |   |   |   |   |   |   |    | Extremely Likely |
|  | 0                 | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 |                  |

- 2)** Please explain why you chose the number above.

- 3) Based on your experience of RTS over the last 3 months, how likely are you to continue using our service?
- Not at All Likely 1 2 3 4 5 6 7 8 9 10 Extremely Likely

- 4) Why do you ride RTS? (*Please check all that apply*)**

- ☐ Don't have to worry about parking      ☐ Don't have to worry about driving in bad weather      ☐ Don't have a car  
☐ It's good for the environment      ☐ Free to do other activities on bus      ☐ Avoids cost of driving car  
☐ Don't have to ask for rides      ☐ I enjoy riding RTS      ☐ Other \_\_\_\_\_

- 5) How important is RTS in your life?**
- Not at all important                      Extremely Important
- 1                      2                      3                      4                      5

- 6)** Rate how *important* the following aspects of a bus ride are to you (1=Not at all important, 10=Extremely Important).

Buses arrive on-time.	①	②	③	④	⑤	⑥	⑦	⑧	⑨	⑩
The buses I ride come to my stops often enough.	①	②	③	④	⑤	⑥	⑦	⑧	⑨	⑩
Buses can take me where I want to go when I want to get there.	①	②	③	④	⑤	⑥	⑦	⑧	⑨	⑩
Bus safety/security.	①	②	③	④	⑤	⑥	⑦	⑧	⑨	⑩
Benches/shelters at stops.	①	②	③	④	⑤	⑥	⑦	⑧	⑨	⑩
Bus Operator behavior/etiquette.	①	②	③	④	⑤	⑥	⑦	⑧	⑨	⑩
Bus comfort/cleanliness.	①	②	③	④	⑤	⑥	⑦	⑧	⑨	⑩

- 7) Based on a scale of 1 to 10, do arrival times meet your expectations?
- Not at all 1 2 3 4 5 6 7 8 9 10 Yes Definitely

- 8)** Based on your experience over the last 3 months, rate your *satisfaction* with RTS's **PERFORMANCE**: (1=Very Dissatisfied, 10=Very Satisfied).

Overall RTS Performance	①	②	③	④	⑤	⑥	⑦	⑧	⑨	⑩
Buses run often enough.	①	②	③	④	⑤	⑥	⑦	⑧	⑨	⑩
Ease of entering /exiting buses.	①	②	③	④	⑤	⑥	⑦	⑧	⑨	⑩
Level of crowding on the bus.	①	②	③	④	⑤	⑥	⑦	⑧	⑨	⑩
Bus cleanliness.	①	②	③	④	⑤	⑥	⑦	⑧	⑨	⑩
Bus comfort.	①	②	③	④	⑤	⑥	⑦	⑧	⑨	⑩
Personal safety/security while riding the bus.	①	②	③	④	⑤	⑥	⑦	⑧	⑨	⑩
Length of time spent riding on the bus.	①	②	③	④	⑤	⑥	⑦	⑧	⑨	⑩
Bus Operator behavior/etiquette.	①	②	③	④	⑤	⑥	⑦	⑧	⑨	⑩

- 9)** RTS updated its services in May 2021 with the launch of Reimagine RTS.

Which of the following updates is most helpful to you? (*Please select ONE*)

- ☐ RTS On Demand      ☐ RTS Go technology      ☐ More frequent rides
- ☐ Better route coverage      ☐ Short line/long line      ☐ Other

- 10)** Have the changes made through Reimagine RTS (ride frequency, personalized rides, route coverage, etc.) made your experience with RTS better or worse? **(Please select ONE)**

Much Worse      Somewhat Worse      Neutral      Somewhat Better      Much Better

- 11)** Do the changes made through Reimagine RTS allow you to ride RTS more frequently? ☐ Yes ☐ No ☐ Unsure

- 12)** With more frequent routes, which has improved most? ☐ Arrival Times ☐ Departure Times

13) Based on your experience over the last 3 months, how strongly do you agree with the following statements (1=Strongly Disagree, 10=Strongly Agree).

When RTS makes changes to its service, I trust those changes will help me.	①	②	③	④	⑤	⑥	⑦	⑧	⑨	⑩
RTS's priority is improving transportation for the entire Rochester community.	①	②	③	④	⑤	⑥	⑦	⑧	⑨	⑩
RTS acknowledges my input when I give it.	①	②	③	④	⑤	⑥	⑦	⑧	⑨	⑩
RTS seeks out my opinion before making changes that affect me.	①	②	③	④	⑤	⑥	⑦	⑧	⑨	⑩
This survey is helping to improve RTS.	①	②	③	④	⑤	⑥	⑦	⑧	⑨	⑩
RTS is always looking for new ways to improve public transit for the community.	①	②	③	④	⑤	⑥	⑦	⑧	⑨	⑩

14) What aspects of service and/or performance do you think RTS needs to improve upon?

15) What are your pronouns? ☐ He/Him ☐ She/Her ☐ Them/They  
☐ Prefer not to say ☐ I identify as: \_\_\_\_\_

16) What is your age? \_\_\_\_\_

17) Racially/ethnically, how do you identify? (Check all that apply)

- ☐ Asian ☐ American Indian/Alaskan Native  
☐ Hispanic/Latin ☐ Black or African American  
☐ White ☐ West Indian/Caribbean  
☐ Middle Eastern ☐ Other \_\_\_\_\_

18) What is the primary language spoken in your home?

- ☐ English ☐ Italian ☐ Spanish  
☐ Chinese ☐ Vietnamese ☐ Hindu-Urdu  
☐ Other \_\_\_\_\_

19) What zip code do you live in? \_\_\_\_\_

20) Does use of the English language pose a difficulty in navigating the RTS system? (Check all that apply)

- ☐ Yes (Reading) ☐ Yes (Speaking) ☐ No

21) Do you have a condition that makes transportation difficult for you? ☐ Yes ☐ No

22) What is your total annual income level?

- ☐ Under \$15K ☐ \$25K - \$50K ☐ Above \$75K  
☐ \$15K - \$25K ☐ \$50K - \$75K

23) What is your occupational status?

- ☐ Employed Full-time ☐ Employed Part-time  
☐ Self-employed ☐ Unemployed  
☐ Student (Full-time) ☐ Student (Part-time)  
☐ Contract ☐ Other \_\_\_\_\_  
☐ None of the above

24) Are you currently a member of student/staff/faculty at any of the following institutions?

- ☐ SUNY Brockport ☐ St. John Fischer  
☐ MCC - Brighton ☐ U of R - Eastman  
☐ MCC - Downtown ☐ U of R - Medical/Mid-Campus  
☐ Nazareth College ☐ U of R - River Campus  
☐ RIT ☐ U of R - South Campus  
☐ Other \_\_\_\_\_ ☐ None of the above

25) Including yourself, how many people live in your household?

- ☐ 1 ☐ 3 ☐ 5  
☐ 2 ☐ 4 ☐ 6+

26) How many motor vehicles (cars, vans, trucks, motorcycles) in your household are available for you to use?

- ☐ 1 ☐ 3 ☐ 5+  
☐ 2 ☐ 4 ☐ None

27) How long are you on the bus for this trip? (In minutes)

- ☐ Less than 5 ☐ 5-10 ☐ 10-15  
☐ 15-20 ☐ 20-25 ☐ 25+

28) Does your fixed route require a transfer?

- ☐ Yes between fixed routes  
☐ Yes, between fixed route and On Demand  
☐ No

29) How often do you ride the bus?

- ☐ 5+ days per week ☐ Once a month or less  
☐ 3-4 days per week ☐ Less than once a week, but more  
☐ 1-2 days per week than once a month

30) How long have you been using RTS service?

- ☐ Less than 3 months ☐ 1-5 years  
☐ 3-6 months ☐ More than 5 years  
☐ 6 months - 1 year

31) Have you used RTS Go?

- ☐ No, I have never heard of RTS Go ☐ Yes, RTS Go mobile  
☐ No, but I have heard of RTS Go ☐ Yes, RTS Go card

32) Have you used any of the following of RTS's service offerings over the past 3 months? (Check all that apply)

- ☐ RTS On Demand ☐ Transit app  
☐ HOPR (Bike/Scooter Share) ☐ RTS Access  
☐ Text Alerts ☐ None of the above

33) For this trip, what payment method did you use?

- ☐ \$1.00 Cash Fare ☐ Senior/Disabled Cash  
☐ All-Day Pass ☐ Senior/Disabled All-Day Pass  
☐ Stored Value Pass ☐ Senior/Disabled 31 Day Pass  
☐ 31 Day Pass ☐ RTS Go mobile (Transit App)  
☐ RTS Go Card

34) Why are you on the bus for this trip?

- ☐ Work ☐ Shopping  
☐ Appointments ☐ Entertainment  
☐ School ☐ Other \_\_\_\_\_

Please provide us your name and phone number in case we need to re-contact you.

Name: \_\_\_\_\_ Email: \_\_\_\_\_ Phone/Mobile Number: \_\_\_\_\_

**Optional:** Please let us know if you would like to sign up for RTS News via Email or SMS/Text Messages (You can unsubscribe at any time)

☐ Email ☐ SMS/Text



2

## Background

For 11 years, the RGRTA has been conducting quarterly ridership surveys of its riders (note that the May 2020 study was cancelled due to the COVID 19 pandemic).

New for Wave 49:

- Q4 (Why do you ride RTS?) was changed to select all that apply.
  - Also, “I enjoy riding RTS” & “I don’t have to ask for rides” were added to the list of response options.
- Reimagine RTS questions were added back to the survey.
- Gender identity question responses changed to pronouns.
- Response options for which part of the English language causes trouble were made more explicit to include Reading and Speaking.
- A new question about employment status was added.
- A new question about local colleges was added.
- A new question about the reason for the current trip was added.
- Questions about the use of RTS technologies and services were re-added.

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4

## Methodology

- Respondents were surveyed on 27 separate routes.
- Data was collected from October 26th – 29th, 2022. Surveys were collected in 4 different dayparts (weekday AM commute, midday, weekday PM commute, and weekend).
- A total of 528 surveys were completed, including 1 in Spanish. The overall results have a margin of sampling error of + or – 4.2% at the .95 level of confidence.
- Sample sizes were based on the percentage of the overall riders in the survey period and applied to the desired number of completes:
  - A minimum of 5 and maximum of 48 completed surveys per route.
  - This allows for minimal weighting as well as adequate coverage.

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## Key Learnings

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## Demographics

- New for w49 the gender question was updated so that respondents selected a pronoun rather than male or female.
- Between w48 and w49 there was a 4% increase in individuals identifying as neither He/Him (male, w48) or She/Her (female, w48).
- Riders identifying as He/Him (male, w48) decreased 10% from the prior wave.

- A minor change in w49, respondents were asked to identify which aspect of the English language gave them trouble (Reading, Speaking, or both) while navigating the RTS system.
- 40% responded that their difficulty with at least one aspect of the English language was an issue when navigating the system.

- New for w49, respondents were asked to identify their employment status.
- 52% were employed full or part-time, self-employed or contract workers.
- 14% of respondents were students (64% full-time, 36% part-time).
- 27% either worked at or attended area colleges.

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## Usage Metrics

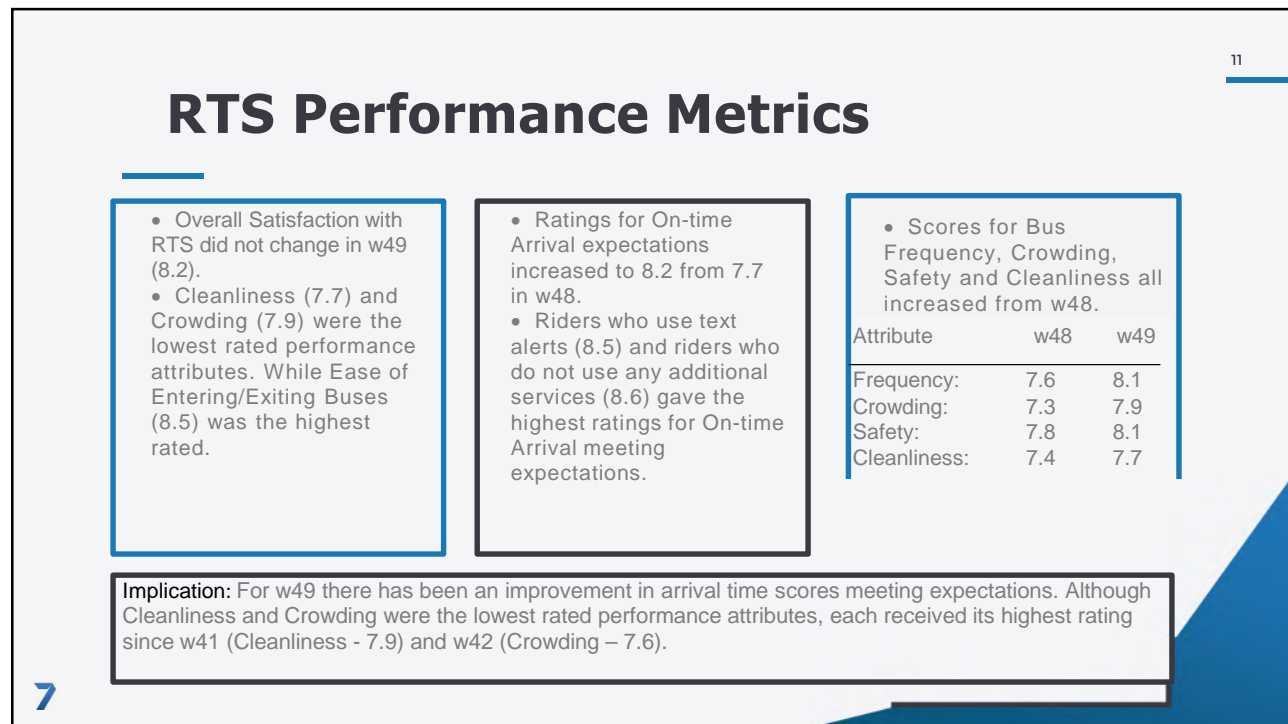
- Added back for w49, respondents were asked about Relmagine RTS.
- Respondents selected RTS On Demand and More Frequent Rides as the most helpful updates for them.
- 60% said Relmagine has made their RTS experience Somewhat to Much Better.

- 59% of respondents said that because of changes resulting from Relmagine, they have increased the number of rides they take.
- Additionally, 74% of respondents said that Arrival times have improved the most and 34% felt that Departure Times improved the most.

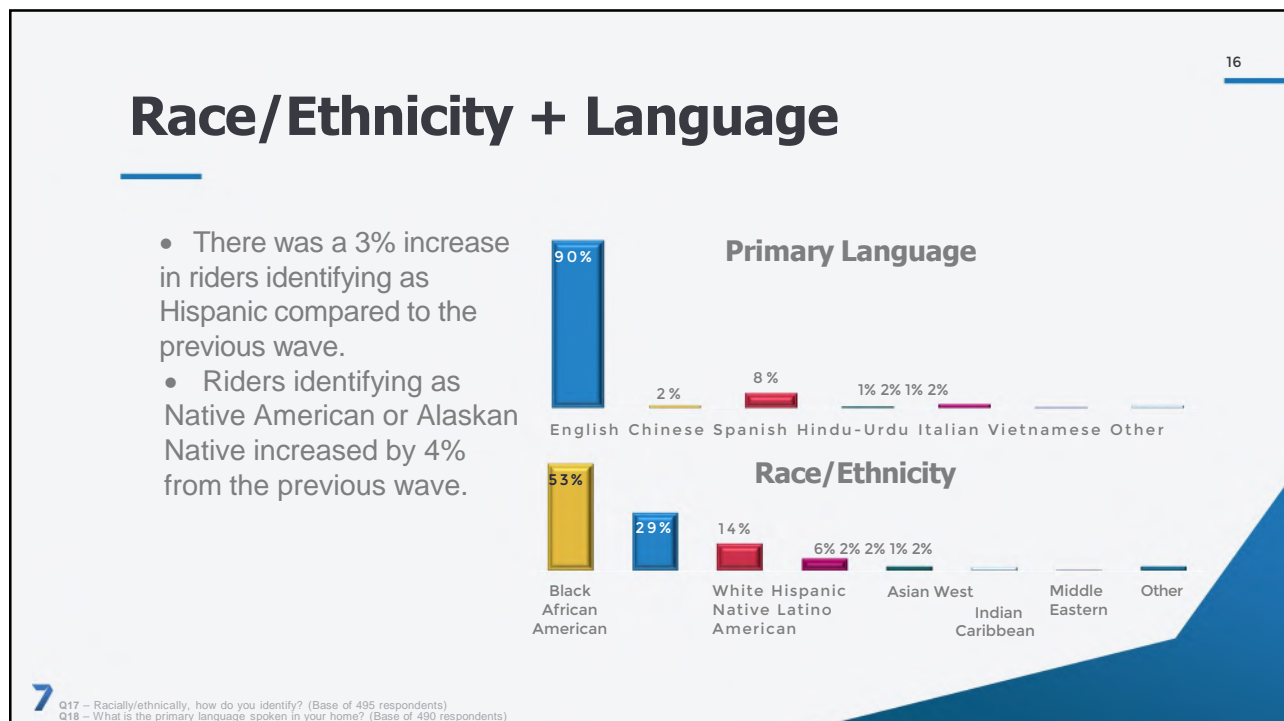
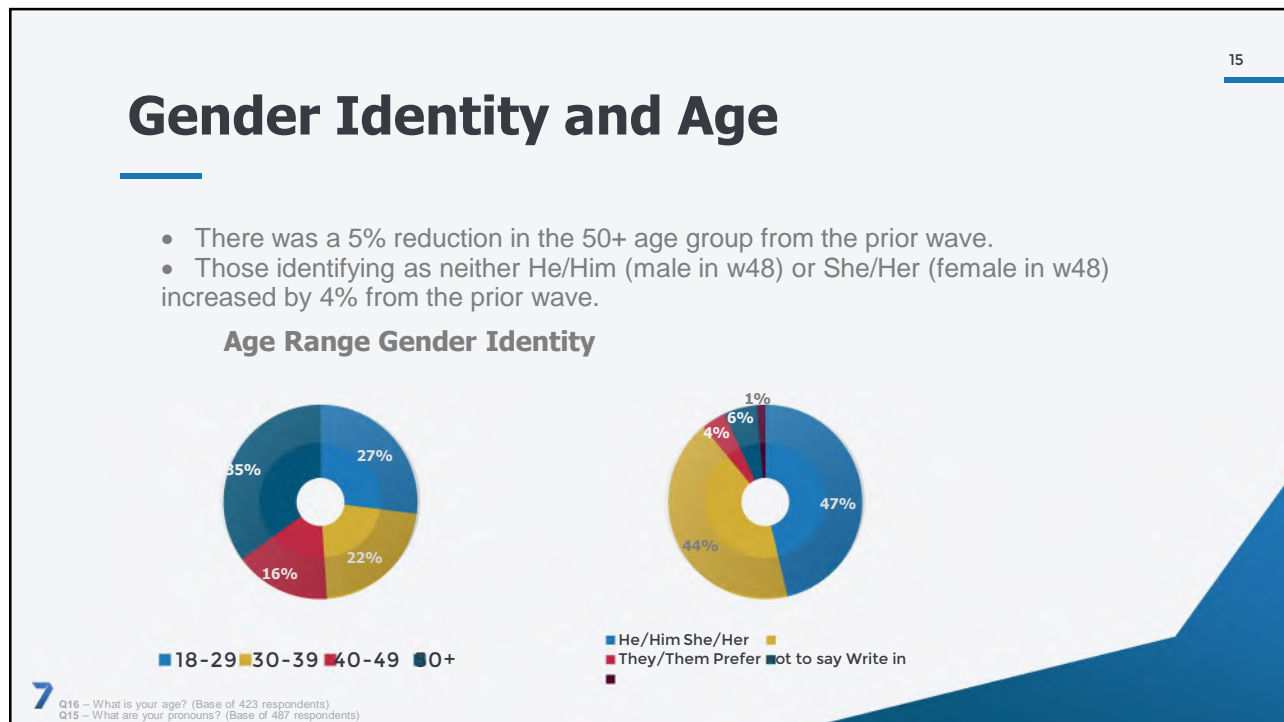
- Loyalty (8.8) remains steady over the past 10 waves.
- 50% of respondents rode the bus for 15+ minutes.
- There was a 5% increase in the number of riders that have been riding RTS for 5 or more years.

**Implication:** 60% of respondents believe that Relmagine has improved their experience, mostly by improving arrival times, bus frequency and the addition of RTS On Demand. Last wave, 18% of respondents had never heard of RTS Go – in w49 that number has increased to 29%. There was a 5% increase in respondents from outside of the Greater Rochester Area which may be causing the drop in awareness.

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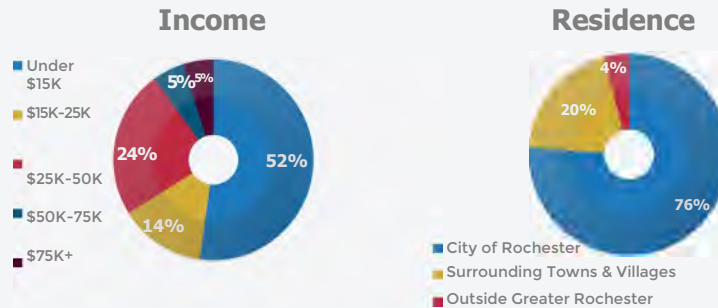




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## Income & Residency

- People taking the survey that reside outside of the City of Rochester (based on zip code) increased by 5% from the previous wave.



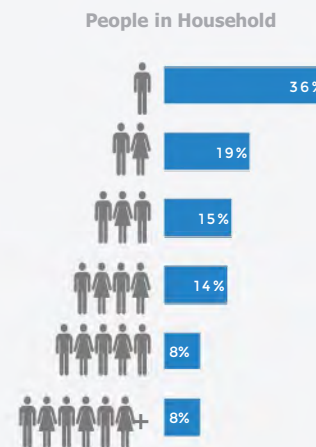
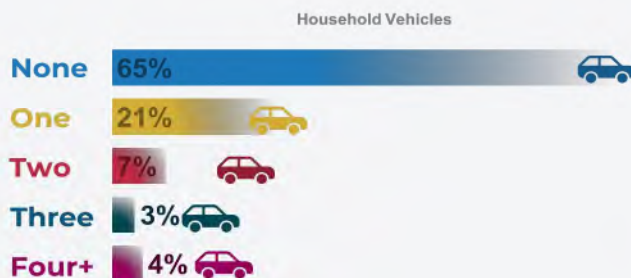
7

Q19 – What zip code do you live in? (Base of 420 respondents)  
 Q22 – What is your total annual income level? (Base of 452 respondents)

18

## Household Members & Vehicles

- Respondents without access to a vehicle increased from 57% in w48 to 65% in the current wave.
- 3-person households dropped 7% from the prior wave.



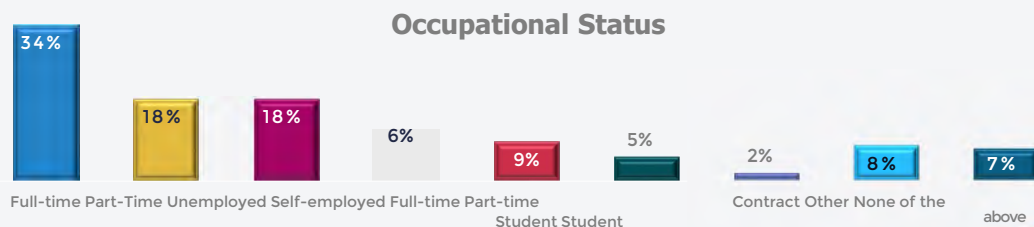
7

Q26 – How many motor vehicles (cars, vans, trucks, motorcycles) in your household are available for you to use? (Base of 478 respondents) Q25 – Including yourself, how many people live in your household? (Base of 474 respondents)

19

## Employment

- New for this wave, respondents were asked to identify their employment status.
- “Retired” as a write-in represented 60% of the “Other” category and 2% of the overall survey.
- “Disabled” or “Disability” represented the remaining 40% of the write-in category and 1.6% of the overall survey.



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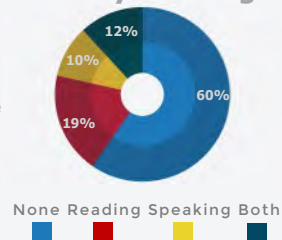
Q23 – What is your occupational status? (Base of 483 respondents)

21

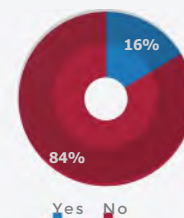
## Accessibility

- New for Wave 49, respondents were asked about the specific aspects of English they might have difficulty with.
  - 41% of respondents believe the use of English makes it difficult to navigate RTS. This is up 10% from the prior wave.
- Respondents with conditions that make transportation difficult decreased by 5% from the previous wave.

**Difficulty with English**



**Transportation Difficulties**



7

Q20 – Does use of the English language pose a difficulty in navigating the RTS system? (Base of 442 respondents)  
 Q21 – Do you have a condition that makes transportation difficult for you? (Base of 446 respondents)

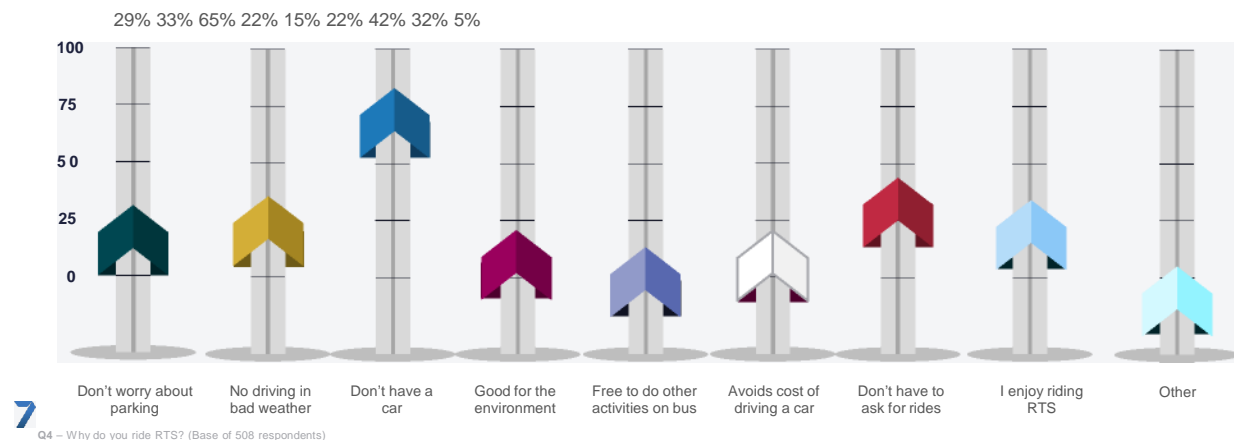
22

## RTS Usage Metrics

23

## Reasons for Riding

- “I enjoy riding RTS” and “Don’t have to ask for rides” were newly added reasons for riding RTS in w49.
- “Don’t have a car” dropped 10%, “Avoids cost of driving a car” dropped 8% from w47, which was the last time reasons for riding was measured in this way.

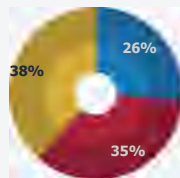


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## Reasons for Riding

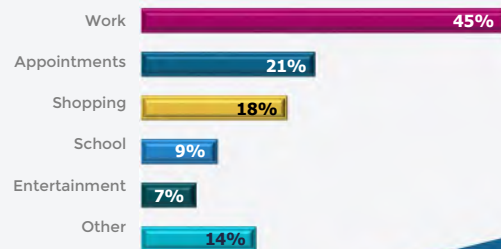
- Compared to w47, ridership based on Need is down 15% while Choice ridership has increased 12%.
- The decrease in need-based riding could potentially be due to the decrease of riders without access to a car.

**Need, Choice, Mix**



■ Need Choice Mix

**Purpose of Today's Trip**



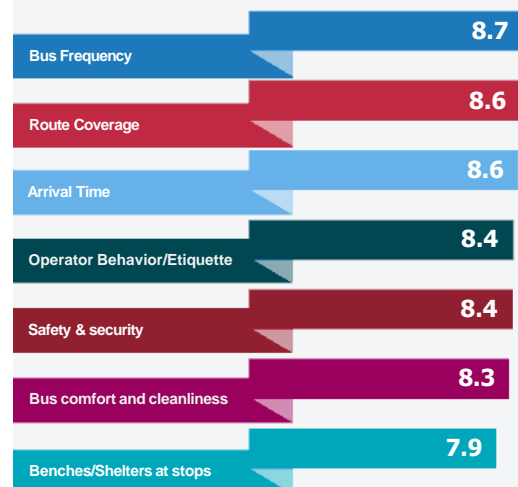
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Q4 – Why do you ride RTS? (Base of 508 respondents)  
Q34 – Why are you on the bus for this trip? (Base of 469 respondents)

25

## Most Important

- Bus Frequency, Route Coverage and Arrival Time were rated the three most important aspects of riding the bus.



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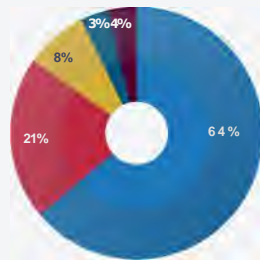
Q6 – Rate how important the following aspects of a bus ride are to you? (Base of 510 respondents)

26

## Frequency + Tenure

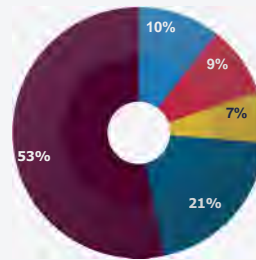
- Representation of the most tenured riders is up 5% from the previous wave.

**Ride Frequency**



■ 5+ 3-4x /wk 1-2x /wk  
■ <1/wk, >1/m <once a month

**Tenure**



■ < 3 months 3-6 months 6-12 months  
■ 1-5 yrs 5+ yrs

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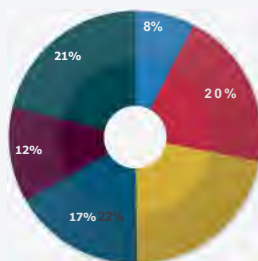
Q29 - How often do you ride the bus? (Base of 473 respondents)  
Q30 - How long have you been using RTS service? (Base of 468 respondents)

27

## Time on bus + Transfer

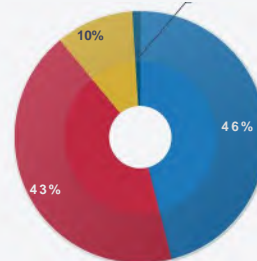
- 54% of riders surveyed said that their trip involved a transfer.
- The percentage of respondents that need to transfer is down 7% from the last time this question was asked in w44.

**Time on Bus**



■ <5 min 5-10 min 10-15 min  
■ 15-20 min 20-25 min 25+ min

**Transfers**



■ no yes - fixed routes  
■ yes - on demand yes - both

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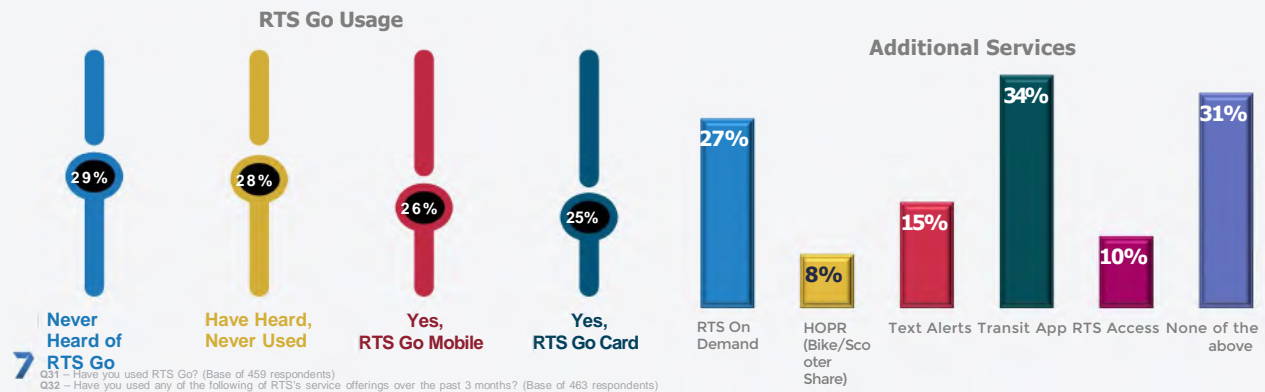
Q27 - How long are you on the bus for this trip? (Base of 465 respondents)  
Q28 - Does your fixed route require a transfer? (Base of 461 respondents)



28

## RTS Go and Other Service Offerings

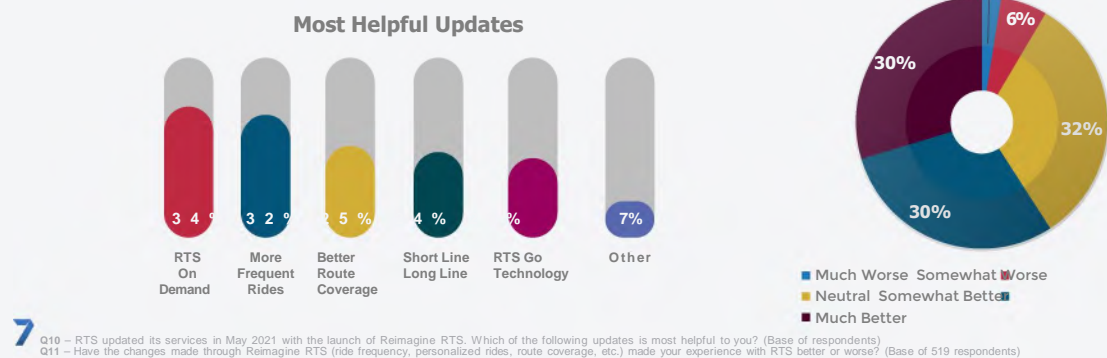
- New for Wave 49 respondents were asked if they have used any of the additional RTS service offerings.
  - Transit App (34%) and RTS On Demand (27%) were the most popular services used.
- Compared to w48, there was an 11% drop in awareness of RTS Go.

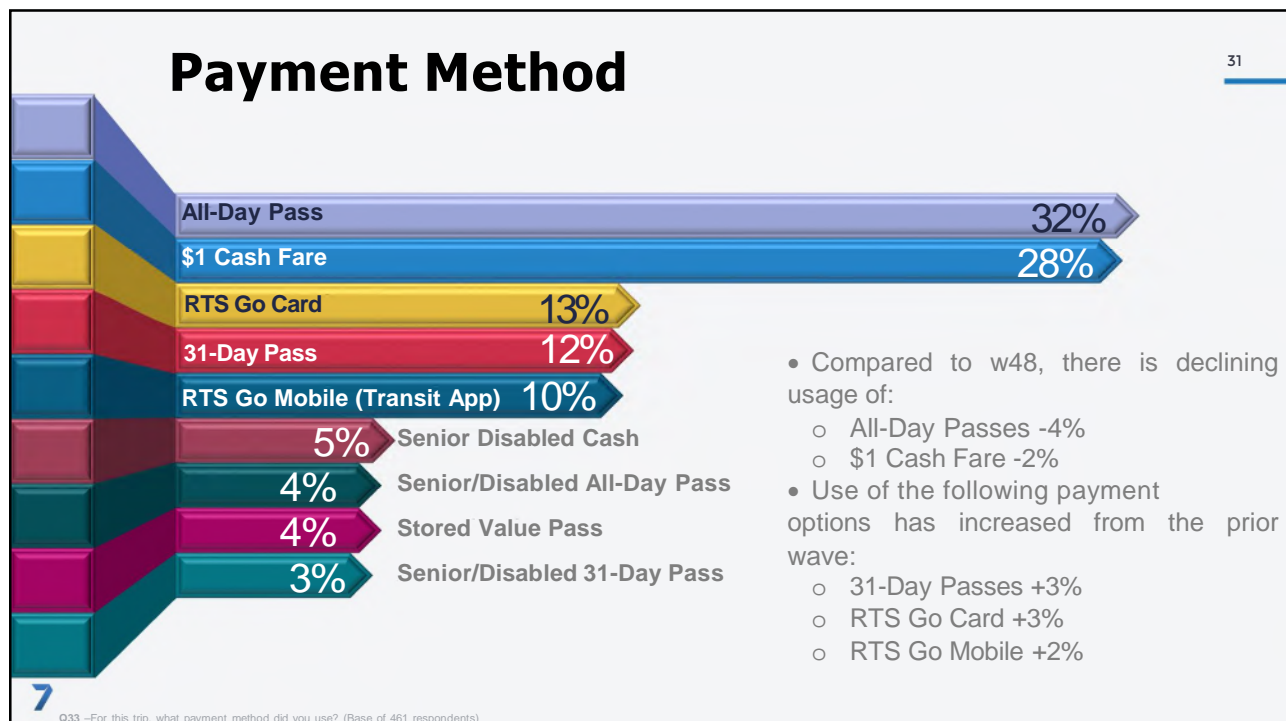
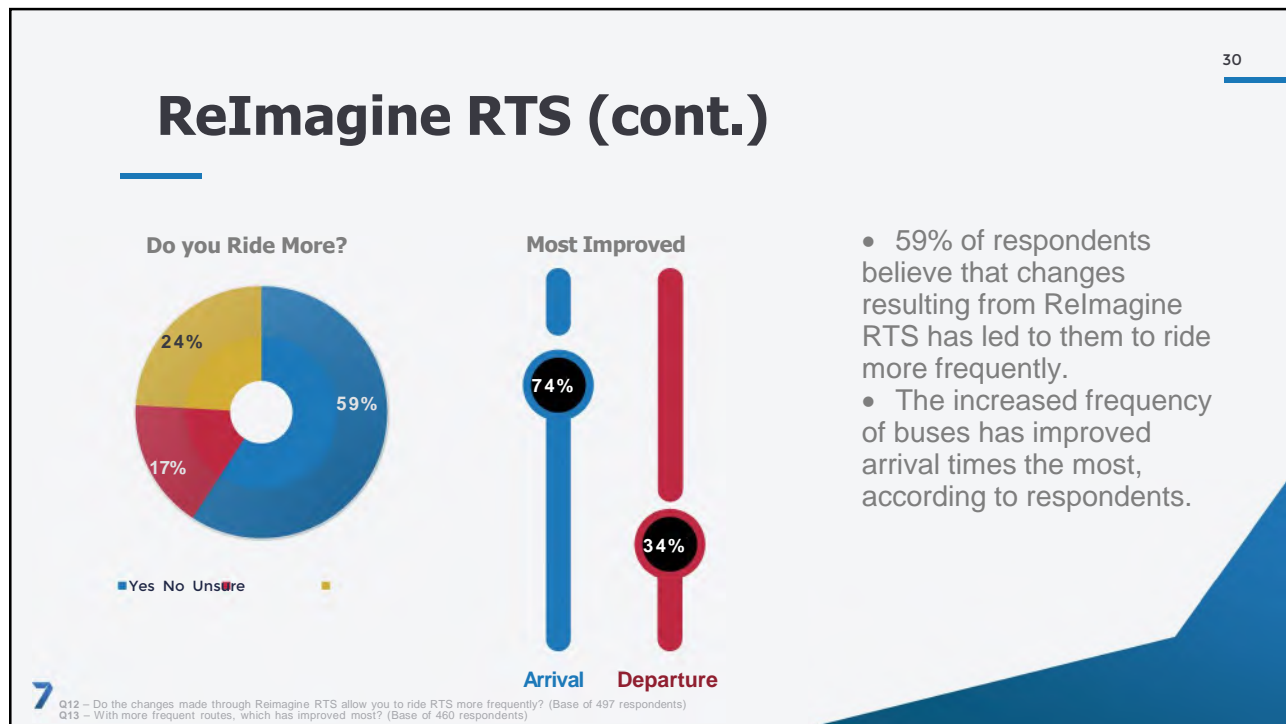


29

## ReImagine RTS

- RTS On Demand (34%) and More Frequent Rides (32%) are rated as the most beneficial aspects of ReImagine RTS.
- 60% of respondents find the ReImagine RTS experience to be Somewhat (30%) or Much (30%) Better than before ReImagine was launched.



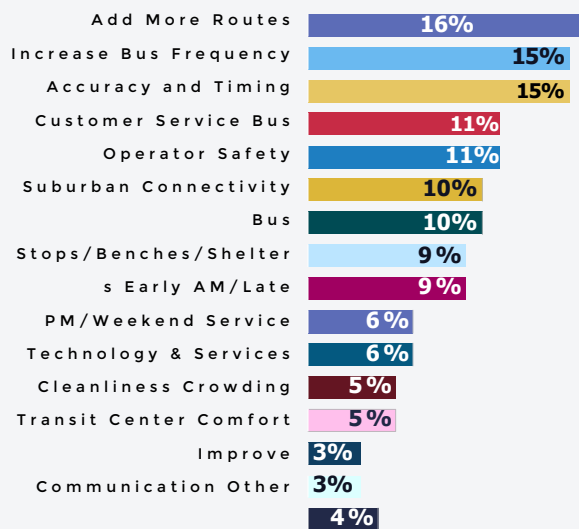


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## Improving Service

68

### Service Improvements



- The call for more routes increased from 9% in w48 to 16% in the current wave.
- Improving Accuracy and Timing increased by 5% from the prior wave.
  - Accuracy & Timing includes:
    - On-Time Arrivals/Departures
    - Better synchronization of timing for Arrivals/Departures when transferring
    - Reducing wait times at stops
- Comments about increasing the availability of suburban routes increased by 6% from the previous wave.

7

Q14 – What aspects of service and/or performance do you think RTS needs to improve upon? (Base of 218 respondents)

67

# Demographic Summary Data

71

## Total Completes

Total			Total		
Wave	Interviewing Dates	Completes	Wave	Interviewing Dates	Completes
Wave 1	September 16 – September 30, 2010	529	Wave 26	December 10 – December 15, 2016	540
Wave 2	December 8 – December 22, 2010	531	Wave 27	March 4 – March 9, 2017	522
Wave 3	March 14 – March 28, 2011	526	Wave 28	May 5 - May 11, 2017	535
Wave 4	June 3 – June 16, 2011	542	Wave 29	August 5 – August 9, 2017	503
Wave 5	August 17 – August 25, 2011	588	Wave 30	November 1 – November 5, 2017	547
Wave 6	December 5 – December 15, 2011	592	Wave 31	February 7 – February 11, 2018	517
Wave 7	March 7 – March 19, 2012	545	Wave 32	April 25 - April 29, 2018	532
Wave 8	June 4 – June 15, 2012	575	Wave 33	August 1 – August 5, 2018	543
Wave 9	October 1 – October 14, 2012	403	Wave 34	November 14 – November 19, 2018	531
Wave 10	December 4 – December 21, 2012	557	Wave 35	February 6 – February 10, 2019	547
Wave 11	March 4 – March 17, 2013	117	Wave 36	May 7 – May 13, 2019	537
Wave 12	June 10 – June 26, 2013	408	Wave 37	August 15 – 19, 2019	494
Wave 13	September 18 – October 6, 2013	445	Wave 38	November 14 – November 18, 2019	520
Wave 14	December 3 – December 23, 2013	428	Wave 39	February 13 – 19, 2020	535
Wave 15	March 15 – March 22, 2014	432	Wave 40	August 13 – 17, 2020	516
Wave 16	June 21 – June 26, 2014	493	Wave 41	November 12 – November 16, 2020	511
Wave 17	September 13 – September 18, 2014	496	Wave 42	February 11 - February 15 2021	509
Wave 18	December 13 – December 18, 2014	500	Wave 43	June 17 – June 21 2021	516
Wave 19	March 14 – March 18, 2015	500	Wave 44	August 13 – August 16 2021	523
Wave 20	June 20 – June 24, 2015	493	Wave 45	October 21 – October 2021	520
Wave 21	September 19 – September 23, 2015	550	Wave 46	February 9 – February 12 2022	515
Wave 22	December 12 – December 16, 2015	551	Wave 47	May 18 – May 21, 2022	531
Wave 23	March 5 – March 10, 2016	546	Wave 48	August 18 – August 27, 2022	513
Wave 24	June 18 – June 22, 2016	547	Wave 49	November – November , 2022	528
Wave 25	September 24 – September 28 2016	560			

- There are 528 completed surveys for Wave 49.
- A total of 24,511 face-to-face onboard interviews have been completed on RTS buses over the course of 49 waves.
- The individual counts by wave and fielding dates are shown in the table.

## Completes by Route

72

Route Description Surveys Daypart			
1	St. Paul	1 4	Weekday PM
2	North Clinton	1 3	Weekend
3	Joseph	1 8	Weekday AM
4	Hudson	3 2	Weekday Midday
5	Portland	1 9	Weekday PM
6	North Goodman	1 1	Weekend
7	Clifford/Empire	1 4	Weekday AM
8	East Main	3 9	Weekday Midday
9	University	9	Weekday PM
10	Park	1 3	Weekend
11	Monroe	2 5	Weekday AM
12	South Clinton	2 0	Weekday Midday
13	South Ave.	1 2	Weekday PM
14	Marketplace	2 1	Weekend
15	Plymouth	1 3	Weekday AM
16	Genesee	4 5	Weekday Midday
17	Jefferson/19 <sup>th</sup> Ward	1 5	Weekday PM
18	Chili	2 7	Weekend
19	Buffalo Rd.	1 6	Weekday AM
20	Lyell	4 8	Weekday Midday
21	Dewey	4 1	Weekday PM
22	Lake	2 2	Weekend
23	West Ave./Airport	1 2	Weekday AM
40	Ridge Crosstown	6	Weekday Midday
41	Culver/Goodman Crosstown	1 0	Weekday PM
50	Fairport/Penfield	8	Weekday Midday
51	St John Fisher Express Commuter		Weekday AM

7

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## Demographic Profile of Customers

	TOTAL 38-49	W49	W48	W47	W46	W45	W44	W43	W42	W41	W40	W39	W38
BASE	6237	528	513	531	515	520	523	516	509	511	516	535	520
Under \$15K	48%	52%	48%	48%	52%	50%	47%	46%	50%	51%	45%	49%	44%
\$15K - \$25K	15%	14%	15%	14%	14%	12%	14%	15%	13%	21%	16%	16%	16%
\$25K - \$50K	23%	24%	28%	29%	23%	21%	21%	20%	22%	21%	21%	18%	25%
\$50K - \$75K	5%	5%	6%	5%	3%	4%	4%	4%	5%	5%	5%	4%	5%
Above \$75K	3%	5%	3%	3%	2%	2%	3%	3%	2%	2%	2%	4%	4%
Did not answer/ Refused	11%	14%	9%	11%	8%	11%	12%	12%	9%	13%	11%	9%	7%
Employed Full-Time	34%	34%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Employed Part-Time	18%	18%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Self-employed	6%	6%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Contract Employee	2%	2%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Unemployed	18%	18%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Student Full-time	9%	9%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Student Part-time	5%	5%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Other	8%	8%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
None of the above	7%	7%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Did not answer/Refused	9%	9%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A



Demographic Profile of Customers														74
	TOTAL 38-49	W49	W48	W47	W46	W45	W44	W43	W42	W41	W40	W39	W38	
BASE	6237	528	513	531	515	520	523	516	509	511	516	535	520	
He/Him	56%	47%	57%	55%	61%	55%	57%	57%	61%	57%	57%	59%	53%	
She/Her	42%	44%	42%	44%	38%	44%	42%	41%	38%	42%	40%	40%	45%	
They/Them	4%	4%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Prefer not to say	2%	6%	3%	3%	*	1%	3%	4%	2%	2%	1%	1%	1%	
Other	1%	1%	1%	1%	1%	2%	1%	2%	1%	1%	1%			
<18	*	*	*	*	*	*	*	*	*	*	*	*	*	
18 - 29	23%	27%	22%	22%	22%	24%	21%	20%	21%	24%	20%	26%	27%	
30 - 39	18%	22%	18%	21%	18%	20%	18%	13%	17%	16%	15%	18%	18%	
40 - 49	16%	16%	15%	20%	19%	17%	14%	15%	16%	16%	16%	15%	17%	
50+	36%	35%	36%	37%	42%	39%	37%	39%	35%	33%	39%	34%	32%	
Did not answer/ Refused	11%	20%	8%	15%	10%	9%	9%	13%	11%	7%	9%	8%	7%	
Asian	2%	2%	2%	2%	1%	2%	2%	1%	2%	1%	2%	1%	2%	
Hispanic/Latino	13%	14%	11%	13%	12%	18%	11%	13%	11%	11%	13%	-	-	
White	30%	29%	31%	27%	31%	30%	29%	32%	27%	35%	33%	28%	29%	
Middle Eastern	1%	1%	1%	2%	2%	1%	1%	1%	1%	1%	1%	1%	2%	
American Indian/Alaskan	3%	6%	2%	3%	3%	3%	3%	3%	3%	4%	3%	3%	4%	
Black/African American	51%	53%	54%	53%	52%	53%	51%	44%	53%	47%	46%	51%	50%	
West Indian/ Caribbean	2%	2%	2%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Other	6%	2%	6%	2%	5%	4%	7%	5%	8%	4%	6%	4%	1%	
Did not answer / Refused	4%	6%		3%	2%	3%	6%	6%	4%	4%	3%	3%	4%	



## EXHIBITS

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# Exhibit 12: Service Monitoring

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RTS Connect - MONTH 2022

Metrics by route are shown below. Values are highlighted based on performance according to service standards for that service type. Values highlighted in green are high performing (125% or higher of product average), while values highlighted in orange are low-performing (74% or less or tier average). Values not highlighted are average-performing (75-124% of tier average).

Routes highlighted in purple are Non-Minority Routes. All other routes qualify as Minority Routes based on 2020 census data. Minority Routes are fixed routes with at least 1/3 revenue miles in Census block groups where the minority population exceeds the average minority population in the service area. - We may classify the route as Minority if our demographic data (survey) shows the ridership for a route is ≥ 50%.

Service Type	Route	Ridership	Service Hours	Boardings per Revenue Hour	Customers per Revenue Mile	% Hour with Customer	Farebox Recovery	Subsidy per Customer Boarding	On-Time Performance	Customer Load Factor	Customer Pass-Ups
Frequent	3 Joseph	23930	1031.7	34.59	3.19	67.06%			92.44%		0
	4 Hudson	26211	1169.48	35.51	2.94	63.12%			91.60%		0
	5 Portland	19766	1153.65	21.83	1.84	78.50%			88.36%		0
	8 East Main	22590	1113.13	27.50	2.42	73.79%			94.13%		0
	16 Genesee	24349	1096.08	29.27	2.41	75.91%			90.53%		0
	21 Dewey	44810	2428.38	24.94	2.16	73.99%			86.36%		0
	22 Lake	33892	1592.28	27.72	1.88	76.78%			82.93%		0
Local	1 St. Paul	19104	892.22	31.63	2.14	67.69%			94.11%		1
	2 North Clinton	17539	960.35	28.15	2.13	64.88%			92.77%		0
	6 North Goodman	18968	898.85	27.23	2.20	77.48%			94.29%		0
	7 Clifford/Empire	15319	872.75	20.64	1.21	85.04%			94.31%		0
	9 University	10981	809.77	22.42	1.85	60.49%			95.53%		1
	10 Park	17824	888.53	26.79	2.55	74.88%			95.19%		0
	11 Monroe	28654	1853.86	19.01	1.38	81.31%			93.33%		3
	12 South Clinton	13267	865.8	17.86	1.29	85.79%			93.21%		7
	13 South Ave	17714	1041.63	20.51	1.75	82.90%			89.31%		0
	14 Marketplace	29754	1475.12	23.90	1.80	84.40%			79.85%		0
	15 Plymouth	12295	860.22	18.37	1.54	77.79%			90.98%		0
	17 Jefferson/19th Ward	19766	1570.5	15.58	1.23	80.80%			88.93%		0
	18 Chili	23004	1278.67	21.46	1.42	83.82%			89.73%		0
	19 Buffalo Road	15275	1241.98	16.19	1.11	75.96%			93.81%		0

RTS On Demand - MONTH 2022

Service Type	Route	Ridership	Service Hours	Boardings per Revenue Hour	Customers per Revenue Mile	% Hour with Customer	Farebox Recovery	Subsidy per Customer Boarding	On-Time Performance	Customer Load Factor	Customer Pass-Ups
	20 Lyell	26319	1343.08	23.95	1.84	81.81%			89.50%		0
	23 West Ave/Airport	14759	1270.53	14.81	1.26	78.41%			88.23%		0
	40 Ridge Crosstown	7335	1002.03	9.07	0.57	80.74%			84.83%		0
	41 Culver/Goodman Crosstown	15688	1802.17	9.93	0.67	87.65%			83.87%		0
	42 Lyell/Upper Falls Crosstown	3585	878.18	5.87	0.39	69.56%			86.91%		0
Suburban	50 Fairport/Penfield	3997	595.43	8.75	0.54	76.68%			88.96%		0
Special	71 Public Market Special	292	39.5	14.24	1.82	51.90%			76.67%		0
Commuter	90 Avon/Rush Commuter		101.92			67.38%			46.52%		0
	91 Newark/Lyons Commuter		115.50			75.76%			84.91%		0
	92 Hilton/Hamlin Commuter		178.50			70.98%			73.45%		0
	96 St. John Fisher Express	272	35.00	16.89	0.57	46.00%					0
	97 Elmwood Commuter	496	108.85	9.08	0.58	50.16%			86.88%		0
	98 Lex Looper		51.45			71.43%					0

37 Fixed Routes (active and including NDS)

# Minority Routes

# Non-Minority Routes: # Commuter [ ], # Suburban [ ], and # Core [ ]

Route	Service Tier	Minority Status	Vehicle Age	OTP	Weekday Peak Load	Weekday Off-peak Load	Weekend Load	Headway	Frequent	Overall	
1 Local	Local	Minority	9	93.39 %	11.4	9.8	8.0	Minority Route Tiers	100%	81%	No Disparity
2 Local	Local	Minority	9	94.46 %	9.7	8.3	8.5				
3 Local	Local	Minority	*	95.85 %	12.0	8.8	7.6	Vehicle Age	Minority	Non-Minority	
4 Local	Local	Minority	*	92.55 %	10.8	7.9	7.8	Frequent	9	NA	NA
5 Local	Local	Minority	*	87.37 %	11.4	7.4	6.7	Local	9	9	No Disparity
6 Local	Local	Minority		89.54 %	10.4	8.3	7.7	Suburban	NA	9	NA
7 Local	Local	Minority		95.77 %	8.1	6.8	6.6	Special	6	NA	NA
8 Frequent	Minority		9	93.26 %	6.6	6.2	6.6	Commuter	2	5	No Disparity
9 Local	Local	Minority	9	96.24 %	7.3	5.4	5.5				
10 Local	Local	Non-Minority	9	92.72 %	9.6	8.1	8.5	OTP	Minority	Non-Minority	
11 Local	Local	Non-Minority	*	91.50 %	12.1	8.1	7.2	Frequent	92.87%	NA	NA
12 Local	Local	Minority		90.74 %	8.0	6.0	5.7	Local	91.22%	92.11%	No Disparity
13 Local	Local	Minority		93.31 %	10.7	8.4	6.9	Suburban	NA	87.27%	NA
14 Local	Local	Minority		86.59 %	11.2	9.7	13.1	Special	70.14%	NA	NA
15 Local	Local	Minority		96.19 %	7.2	6.1	5.8	Commuter	78.00%	81.34%	No Disparity
16 Frequent	Minority		9	94.72 %	8.3	7.0	6.3				
17 Local	Local	Minority	9	91.87 %	9.1	7.2	8.1	Weekday Peak Load	Minority	Non-Minority	
18 Local	Local	Minority	9	90.86 %	11.6	9.5	11.5	Frequent	9.1	NA	NA
19 Local	Local	Minority	9	93.12 %	9.3	7.5	5.7	Local	9.9	10.9	No Disparity
20 Local	Local	Minority	9	89.61 %	17.3	13.3	13.7	Suburban	NA	6.7	NA
21 Frequent	Minority		9	90.64 %	12.3	11.5	13.6	Special	1.0	NA	NA
22 Local	Local	Minority	*	88.85 %	15.9	11.5	10.1	Commuter	2.0	5.3	No Disparity
23 Local	Local	Minority	9	92.96 %	7.6	7.8	7.5				
40 Local	Local	Minority	9	84.69 %	3.4	3.1	3.4	Weekday Off-peak Load	Minority	Non-Minority	
41 Local	Local	Minority	9	80.38 %	6.3	5.3	6.0	Frequent	8.2	NA	NA
50 Suburban	Non-Minority		9	87.27 %	6.7	3.8	1.4	Local	7.9	8.1	No Disparity
70 Special	Minority		6	78.95 %	1.2	1.2	1.7	Suburban	NA	3.8	NA
71 Special	Minority		6	61.33 %	0.7	1.5	5.2	Special	1.3	NA	NA
91 Commuter	Non-Minority		4	62.44 %	4.7	2.8	NA	Commuter	NA	2.2	NA
92 Commuter	Non-Minority		6	81.59 %	3.9	1.7	NA				
97 Commuter	Non-Minority		6	100.00 %	7.5	NA	NA	Weekend Load	Minority	Non-Minority	
98 Commuter	Minority		2	78.00 %	2.0	NA	NA	Frequent	8.8	NA	NA
								Local	7.8	7.8	No Disparity
								Suburban	NA	1.4	NA
								Special	3.4	NA	NA
								Commuter	NA	NA	NA
* indicates route that has temporarily reduced service											




**REGIONAL TRANSIT SERVICE**

# Title VI Monitoring (Minority Routes)

Q1 2022

1



**REGIONAL TRANSIT SERVICE**


## Background on Minority Routes

- **Helps us to understand whether service routes are equitable under Title VI**
- **Minority Route definition**
  - Fixed route with at least 1/3 revenue miles in Census block groups where the minority population exceeds the average minority population in the service area.
  - We may classify the route as Minority if our demographic data (survey) shows the ridership for a route is  $\geq 50\%$ .

32 Fixed Routes (active, no NDS)	
26 Minority Routes	6 Non-Minority Routes
26 based on minority % of Census block	2 Core
Insufficient data to adjust for % of minority ridership	1 Suburban
Routes 3, 4, 5, and 22 all have reduced service	4 Commuter

2






REGIONAL TRANSIT SERVICE

## Background on Minority Routes

- We need to regularly monitor the Minority Routes for changes to the Level or Quality of service in relation to non-Minority routes.
- If the average service on minority routes (by service type) is 25%+ worse than non-minority routes, the route is demonstrating disparity.
  - We must evaluate factors contributing to the issue and mitigate those factors to bring the service to a more equitable level.

Level of Service	Quality of Service
<ul style="list-style-type: none"> <li>Vehicle Load</li> <li>Headway</li> </ul>	<ul style="list-style-type: none"> <li>Distribution of Amenities</li> <li>Vehicle Assignment</li> <li>Service Type/Allocation</li> <li>OTP</li> </ul>

3




REGIONAL TRANSIT SERVICE

## Data from Q1 2022

Q1 2022 Minority Route Comparison.pdf

No Disparities

4


**REGIONAL TRANSIT SERVICE**


## Amenities – April 2022

**11 Bus Stops Removed April 2022**

Route	Bus Stop Location
42	Bausch & St. Paul
42	Upper Falls & Clinton
42	Upper Falls & Clinton
42	Upper Falls & Joseph
42	Upper Falls & Joseph
42	Upper Falls & Hudson
42	Cleveland & North
42	Draper & Portland
42	Upper Falls & St. Paul
42	Smith & Vincent
42	Gates Plaza

**0 Bus Stops Added/Installed**  
**0 Bus Shelters Installed**  
**0 Bus Shelter Removed**

5


**REGIONAL TRANSIT SERVICE**

## Amenities – June 2022

- No changes to amenities**

6



REGIONAL TRANSIT SERVICE

## Considerations

- 4 of 5 routes at reduced service are Minority Routes (3, 4, 5, 22)
- Paused Route 42 is a Minority Route

Strategic Pillars 2021-22 FYE	Metric	Plan Goal	Actual 1st Quarter	Actual 2nd Quarter	Actual 3rd Quarter	Actual 4th Quarter	Actual FYE	Earned Points	Goal Points	Max Points	Min Points
Financial Performance Index	End of Year Net Income (Deficit) Projection	\$0.0	\$0.0	\$1,462.0	\$1,462.0	\$1,462.0	\$1,462.0	26.00	20.00	26.00	14.00
	Total FPI Score							26.0	20.0	26.0	14.0
Customer Service Index	Net Promoter Score - RTS	38%	36%	31%	33%	37%	34%	12.19	15.00	19.50	10.50
	Customer Satisfaction - RTS Access	95%	98%	98%	99%	98%	98%	1.49	1.25	1.63	0.88
	Customer Satisfaction - RTS Genesee	95%	100%	100%	100%	98%	100%	1.59	1.25	1.63	0.88
	Customer Satisfaction - RTS Livingston	95%	100%	100%	100%	100%	100%	1.63	1.25	1.63	0.88
	Customer Satisfaction - RTS Ontario	95%	98%	99%	95%	100%	98%	1.47	1.25	1.63	0.88
	Customer Satisfaction - RTS Orleans	95%	100%	97%	97%	100%	98%	1.51	1.25	1.63	0.88
	Customer Satisfaction - RTS Seneca	95%	100%	100%	100%	100%	100%	1.63	1.25	1.63	0.88
	Customer Satisfaction - RTS Wayne	95%	100%	100%	100%	100%	100%	1.63	1.25	1.63	0.88
	Customer Satisfaction - RTS Wyoming	95%	100%	100%	100%	100%	100%	1.63	1.25	1.63	0.88
	Customer Complaints - Timeliness	99%		99%	99%		99%	5.00	5.00	6.50	3.50
Total CSI Score								24.7	30.0	39.0	21.0
Service Performance Index	On-Time Performance - RTS	90.50%	91.07%	89.49%	89.30%	92.57%	90.61%	18.23	18.00	23.40	12.60
	On-Time Performance - RTS Access	95.00%	96.3%	96.2%	95.1%	96.2%	96.0%	4.38	4.00	5.20	2.80
	On-Time Performance - RTS Genesee	93.0%	96.7%	95.3%	95.3%	95.8%	95.8%	1.30	1.00	1.30	0.70
	On-Time Performance - RTS Livingston	90.0%	100.0%	100.0%	100.0%	100.0%	100.0%	1.30	1.00	1.30	0.70
	On-Time Performance - RTS Ontario	92.0%	97.1%	94.1%	94.2%	94.4%	95.0%	1.30	1.00	1.30	0.70
	On-Time Performance - RTS Orleans	95.5%	94.6%	93.9%	97.9%	99.0%	96.4%	1.10	1.00	1.30	0.70
	On-Time Performance - RTS Seneca	97.0%	100.0%	100.0%	100.0%	100.0%	100.0%	1.30	1.00	1.30	0.70
	On-Time Performance - RTS Wayne	96.0%	95.3%	99.4%	94.8%	98.7%	97.1%	1.16	1.00	1.30	0.70
	On-Time Performance - RTS Wyoming	96.0%	99.2%	97.0%	97.7%	96.1%	97.5%	1.30	1.00	1.30	0.70
	RTS On Demand Ride Fulfillment	85.0%		74.7%	75.6%	65.6%	72.0%	6.30	9.00	11.70	6.30
	RTS Access Booking Accuracy	95.0%		98.5%	99.8%	99.2%	99.2%	2.60	2.00	2.60	1.40
Total SPI Score								40.3	40.0	52.0	28.0
Employee Engagement Index	Employee Participation	27.5%		39.3%		33.4%	36.4%	-	-	-	-
	Employee Engaged Index	24.0%		38.0%		19.0%	28.5%	5.61	5.00	6.50	3.50
	Employee Satisfaction	4.0		4.2		4.1	4.2	5.51	5.00	6.50	3.50
	Total EEI Score							11.1	10.0	13.0	7.0
TOPS Score								102.1	100.0	130.0	70.0



# TOPS

## TRANSIT ORGANIZATION PERFORMANCE SCORECARD

		SCORE FYE
FPI	FINANCIAL PERFORMANCE INDEX	26.0
CSI	CUSTOMER SATISFACTION INDEX	24.7
SPI	SERVICE PERFORMANCE INDEX	40.3
EEI	EMPLOYEE ENGAGEMENT INDEX	11.1
TOTAL		102.1

Strategic Pillars 2022-23 FYE	Metric	Plan Goal	Actual 1st Quarter	Actual 2nd Quarter	Actual 3rd Quarter	Actual 4th Quarter	Actual FYE	Earned Points	Goal Points	Max Points	Min Points
Financial Performance Index	End of Year Net Income (Deficit) Projection	\$0.0	\$0.0	\$1,373.0	\$0.0	\$0.0	\$0.0	20.00	20.00	26.00	14.00
	Total FPI Score							20.0	20.0	26.0	14.0
Customer Service Index	Net Promoter Score - RTS	36%	34%	37%	34%	0%	26%	19.54	27.92	36.30	19.54
	Customer Satisfaction - RTS Access	95%	98%	97%	97%	0%	73%	0.18	0.26	0.34	0.18
	Customer Satisfaction - RTS Genesee	95%	100%	100%	99%	0%	75%	0.18	0.26	0.34	0.18
	Customer Satisfaction - RTS Livingston	95%	100%	100%	100%	0%	75%	0.18	0.26	0.34	0.18
	Customer Satisfaction - RTS Ontario	95%	97%	100%	100%	0%	74%	0.18	0.26	0.34	0.18
	Customer Satisfaction - RTS Orleans	95%	100%	92%	97%	0%	72%	0.18	0.26	0.34	0.18
	Customer Satisfaction - RTS Seneca	95%	100%	100%	98%	0%	75%	0.18	0.26	0.34	0.18
	Customer Satisfaction - RTS Wayne	95%	100%	97%	100%	0%	74%	0.18	0.26	0.34	0.18
	Customer Satisfaction - RTS Wyoming	95%	92%	100%	100%	0%	73%	0.18	0.26	0.34	0.18
	Total CSI Score							21.0	30.0	39.0	21.0
Service Performance Index	On-Time Performance - RTS	91.38%	92.50%	91.80%	92.30%	0.00%	69.15%	25.62	36.60	47.58	25.62
	Ride Fulfillment - OnDemand	72.5%	65.1%	63.4%	65.7%	0.0%	48.6%	0.42	0.60	0.78	0.42
	On-Time Performance - RTS Access	95.0%	96.8%	96.4%	96.1%	0.0%	72.3%	0.25	0.35	0.46	0.25
	On-Time Performance - RTS Genesee	94.0%	95.0%	94.0%	96.0%	0.0%	71.3%	0.25	0.35	0.46	0.25
	On-Time Performance - RTS Livingston	95.0%	100.0%	100.0%	100.0%	0.0%	75.0%	0.25	0.35	0.46	0.25
	On-Time Performance - RTS Ontario	93.0%	93.1%	92.9%	94.3%	0.0%	70.1%	0.25	0.35	0.46	0.25
	On-Time Performance - RTS Orleans	95.0%	96.1%	96.2%	97.9%	0.0%	72.6%	0.25	0.35	0.46	0.25
	On-Time Performance - RTS Seneca	97.0%	100.0%	99.6%	98.4%	0.0%	74.5%	0.25	0.35	0.46	0.25
	On-Time Performance - RTS Wayne	96.0%	98.8%	98.8%	98.4%	0.0%	74.0%	0.25	0.35	0.46	0.25
	On-Time Performance - RTS Wyoming	97.0%	96.2%	95.7%	95.8%	0.0%	71.9%	0.25	0.35	0.46	0.25
	Total SPI Score							28.0	40.0	52.0	28.0
Employee Engagement Index	Employee Participation (Not scored)	33.0%		41.6%		0.0%	20.8%				
	Employee Engaged Index	32.0%		23.2%		0.0%	11.6%	3.50	5.00	6.50	3.50
	Employee Satisfaction	4.0		4.0		-	2.0	3.50	5.00	6.50	3.50
	Total EEI Score							7.0	10.0	13.0	7.0
TOPS Score								76.0	100.0	130.0	70.0





# TOPS

## TRANSIT ORGANIZATION PERFORMANCE SCORECARD

		SCORE 4th Qtr.
FPI	FINANCIAL PERFORMANCE INDEX	20.0
CSI	CUSTOMER SATISFACTION INDEX	21.0
SPI	SERVICE PERFORMANCE INDEX	28.0
EEI	EMPLOYEE ENGAGEMENT INDEX	7.0
TOTAL		76.0

## EXHIBITS

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# Exhibit 13: Major Service Change Reports

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## MEMORANDUM

To: Miguel Velazquez  
From: Dan DeLaus, Sara Molyneux  
Cc: Scott Adair, Amy Gould  
Date: 02/15/23  
Re: Summary of Fixed Route Major Service Changes, Equity Impacts, and Mitigations – September 06, 2021, to January 02, 2023

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This memo lists the Major Service Changes with Equity Impacts implemented by RTS on fixed route service from September 06, 2021, to January 02, 2023. The Mitigations for each change are included, as required by the FTA Title VI requirements for fixed route systems.

### FTA Title VI Requirements

FTA C 402.1B circular, Chap. IV-16, pages 42 through 48

#### 1. Requirement to Evaluate Service and Fare Changes

Upon completion of a service or fare equity analysis, the transit provider shall brief its board of directors, top executive, or appropriate governing entity or official(s) responsible for policy decisions regarding the service and/or fare change(s) and the equity impacts of the service and/or fare change(s). The transit provider shall submit documentation such as a board resolution, copy of meeting minutes, or similar documentation with the Title VI Program as evidence of the board or governing entity or official's consideration, awareness, and approval of the analysis.

#### 2. Analysis of Modifications

If the transit provider finds potential disparate impacts and then modifies the proposed changes in order to avoid, minimize, or mitigate potential disparate impacts, the transit provider must reanalyze the proposed changes in order to determine whether the modifications actually removed the potential disparate impacts of the changes.

#### 3. Finding a Disparate Impact on the Basis of Race, Color, or National Origin

If a transit provider chooses not to alter the proposed service changes despite the potential disparate impact on minority populations, or if the transit provider finds, even after the revisions, that minority riders will continue to bear a disproportionate share of the proposed service change, the transit provider may implement the service change only if:

- a) the transit provider has a substantial legitimate justification for the proposed service change, and
- b) the transit provider can show that there are no alternatives that would have a less disparate impact on minority riders but would still accomplish the transit provider's legitimate program goals.

It is important to understand that in order to make this showing, the transit provider must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

#### 4. Examining Alternatives

If the transit provider determines that a proposed service change will have a disparate impact, the transit provider shall analyze the alternatives (identified in the second bullet above) to determine whether alternatives exist that would serve the same legitimate objectives but with less of a disparate effect on the basis of race, color, or national origin. The existence of such an alternative method of accomplishing the transit provider's substantial and legitimate interests demonstrates that the disparate effects can be avoided by adoption of the alternative methods without harming such interests. In addition, if evidence undermines the legitimacy of the transit provider's asserted justification - that is, that the justification is not supported by demonstrable evidence - the disparate effects will violate Title VI, as the lack of factual support will indicate that there is not a substantial legitimate justification for the disparate effects. At that point, the transit provider must revisit the service changes and make adjustments that will eliminate unnecessary disparate effects on populations defined by race, color, or national origin. Where disparate impacts are identified, the transit provider shall provide a meaningful opportunity for public comment on any proposed mitigation measures, including the less discriminatory alternatives that may be available.

#### Exceptions

The following are not considered Major Service Changes:

- Subsidized route extension (business partner)
- Experimental route
- Neighborhood Direct Service (NDS)
- Minor route change
- Minor timing change

#### Definitions

**Disparate Impact** shall mean a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where (i) the recipient's policy or practice lacks a substantial legitimate justification; and where (ii) there exists one or more alternatives that would service the same legitimate objectives, but with less disproportionate effect on the basis of race color or national origin.

**Disproportionate Burden** shall mean an adverse effect that places greater burden on a Low-Income Population versus other economic population groups.

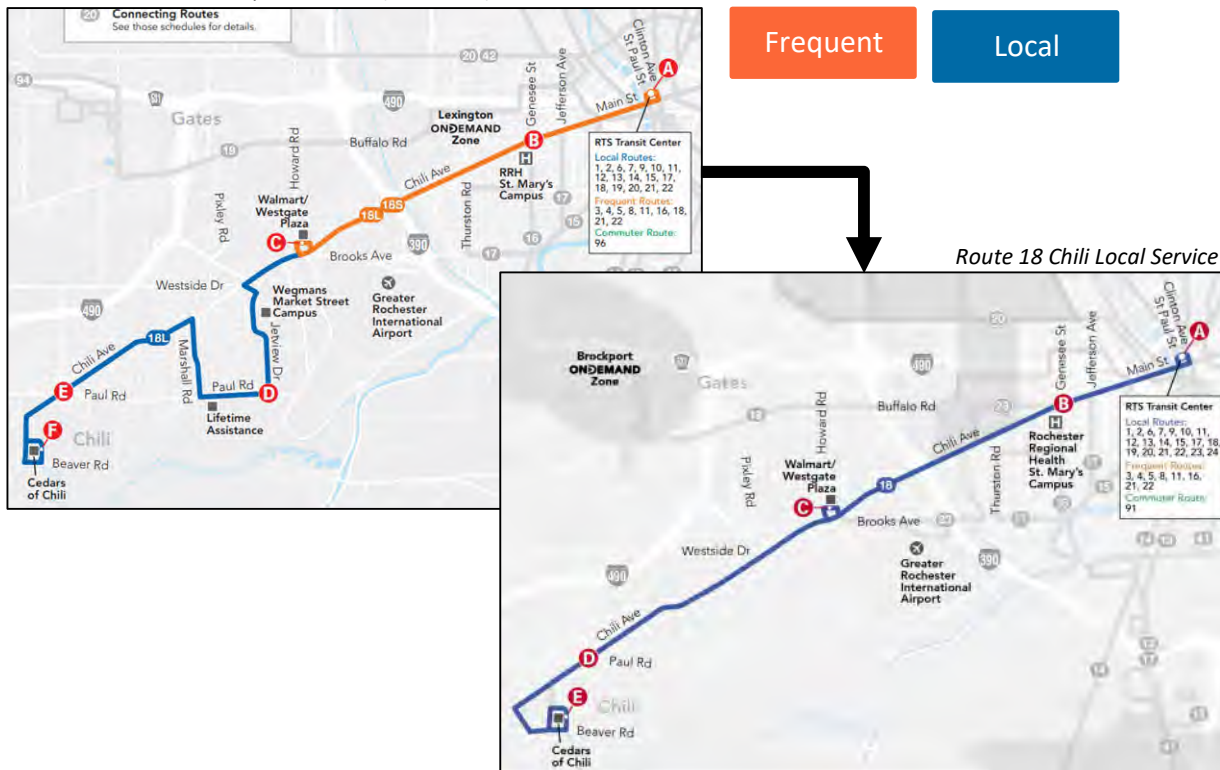
**Minority Customer Routes** shall mean those RTS routes that have at least one-third of the revenue miles located in Census block groups where the minority population percentage exceeds the average minority population percentage in the service area. RGRTA may adjust this classification if route-specific ridership data shows that ridership characteristics do not reflect the characteristics of the census blocks through which the route travels.

## Major Service Changes with Equity Impacts and Mitigations

### 1. Changing the 18 Chili Short Line Frequent Route to a Local Route

The 18 Chili has a “short line” Frequent service portion and a “long line” Local service portion. The Local service provided 30-minute frequency 6am-6pm weekdays and served Walmart/Westgate Plaza to Cedars of Chili. The Frequent service provided 15-minute frequency 6am-6pm weekdays Downtown to Walmart/Westgate Plaza. The Frequent service to Jetview Drive had low ridership, with on- and off- boardings averaging 0.35 customers per trip. Removing the short line Frequent service portion will provide Local service on the entire route. The Jetview Drive portion was removed, all in-bound trips were shifted, and one weekend trip was added. The modified 18 Chili serves the RTS Transit Center, Rochester Housing Authority, RRH St. Mary’s Hospital, Walmart - Chili Ave, Chili-Paul Plaza, and Cedars of Chili Apartments.

Route 18 Chili with Frequent Service (Short Line)

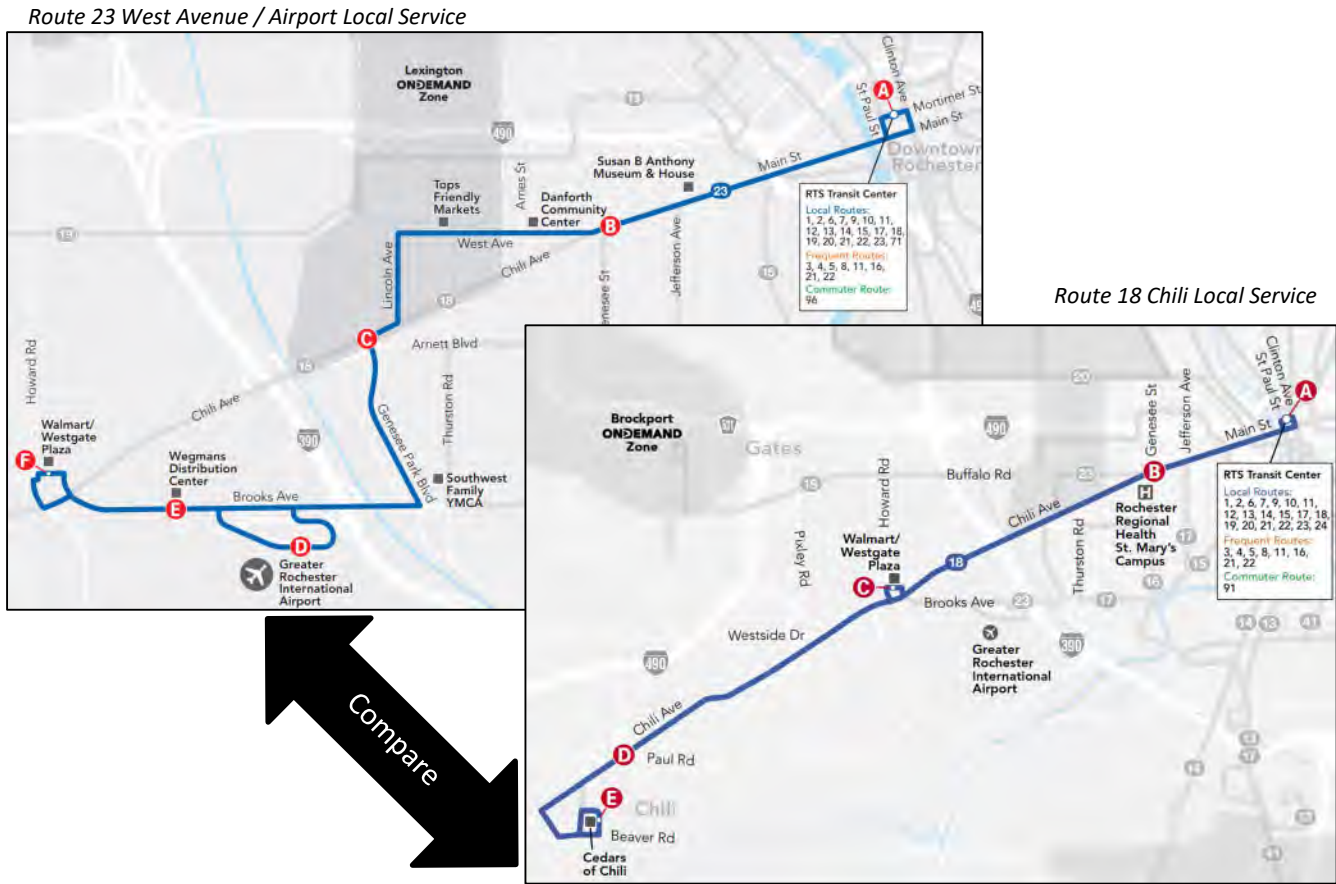


Major Service Change	Minority Route	Equity Impacts	Mitigation	Date Effective
Yes	Yes	Disparate Impact and Disproportionate Burden	Yes. Add new Local route 23 West Avenue/Airport.	09/06/2021

### Mitigation for Changing Frequent portion of 18 Chili to Local Service

A new Route 23 West Ave/Airport covers West Ave, Genesee Park Blvd, the Airport loop, the Wegmans Distribution Center, and the Chili Av. Walmart. 23 West Ave/Airport provides Local service 7 days a week 30-minute frequency 6am-6pm weekdays. The route 23 provides additional service options along West Main and to Chili Walmart. The route serves Tops – West Avenue, Danforth Community Center, Rochester International Airport, Wegmans Distribution Center, and Walmart – Chili Avenue. The portion of the 23 West Ave/Airport travels into the Lexington On Demand zone.





2. Increasing Headway on Frequent Routes 3 Joseph Avenue, 4 Hudson Avenue, 5 Portland Avenue, 8 East Main Street, 16 Genesee Street, and 22 Lake Avenue

An emergency measure approved by the Board of Commissioners (Resolution RGRTA 38-2021) to increase the headway from 15-minutes to 30-minutes from 6:00 AM to 6:00 PM weekdays, which makes the routes behave like Local routes. The change in revenue hours is due to discontinuing 15-minute service and implementing 30-minute headway. There is no change or reduction in routing. The change was considered temporary and due to workforce shortages resulting from the COVID-19 pandemic. The change allows RTS to reallocate resources to provide increased NDS routes to assist Rochester City School District in transporting students to schools within the urban core of Rochester.

Major Service Change	Minority Route	Equity Impacts	Mitigation	Dates Effective
Yes	Yes, all routes.	Disparate Impact: <ul style="list-style-type: none"><li>3 Joseph, 4 Hudson, 5 Portland, 16 Genesee, and 22 Lake</li></ul> Disproportionate Burden: <ul style="list-style-type: none"><li>All routes</li></ul>	No equitable alternatives exist without a larger available workforce. RTS has increased efforts to hire Bus Operators, including advertising and holding “job fair” events. We will decrease headways on routes when enough Bus Operators are available, with priority for those with high ridership and customer demand.	09/06/2021 to 01/02/2022

## Updates

15-minute frequency was restored to 16 Genesee and 8 East Main on 01/03/2022. The analysis becomes as follows.

Major Service Change	Minority Route	Equity Impacts	Mitigation	Dates Effective
Yes	Yes, all routes.	Disparate Impact and Disproportionate Burden: <ul style="list-style-type: none"> <li>3 Joseph, 4 Hudson, 5 Portland, and 22 Lake</li> </ul>	No equitable alternatives exist without a larger available workforce. RTS has increased efforts to hire Bus Operators, including advertising and holding “job fair” events. We will decrease headways on routes when enough Bus Operators are available, with priority for those with high ridership and customer demand.	01/03/2022 to present

### Mitigation for Increased Headways on Routes 3, 4, 5, and 22

RTS tracks the level of Bus Operator staffing monthly. RTS Connect needs 30 additional Bus Operators before it can operate Routes 3, 4, 5, 8, and 22 as Frequent service. Despite assertive recruitment campaigns, RTS has been unable to attain the necessary pool of Bus Operators. The change in NYS CDL Road test requirements has decreased the pass rate for Bus Operator trainees, creating an additional obstacle to attaining the necessary workforce pool. RTS does not expect to mitigate the equity impacts before June 01, 2023. Recruitment, trainee pass rates, and attrition will dictate when RTS has enough Bus Operators to mitigate the increased headway impacts.

RTS will augment efforts to secure funding levels necessary to hire and train more Bus Operators to restore headways to 15-minute frequency as quickly as possible.

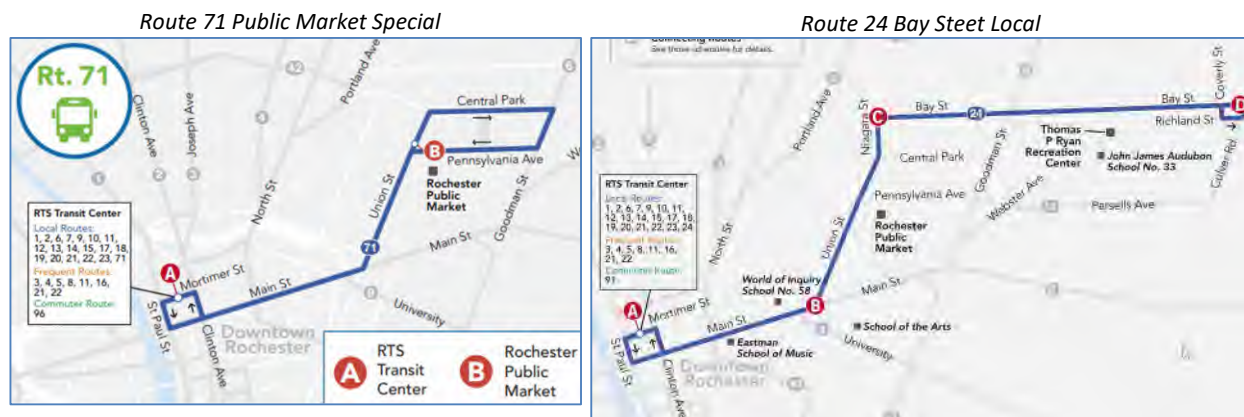
### 3. Discontinue 71 Public Market Special

The route was added to the system September 06, 2021, to serve the Rochester Public Market on Thursdays from 9:00 AM to 12:30 PM and Saturdays from 8:00 AM to 12:30 PM. During the one year it was active, the route proved to be popular. Customers voiced frustration that the route did not serve more than the Public Market, indicating demand for service with more coverage and more stops. The route will be replaced with Local Route 24 Bay Street.

Major Service Change	Minority Route	Equity Impacts	Mitigation	Date Effective
Yes	Yes	Disparate Impact and Disproportionate Burden	Yes. A new Local route (24 Bay Street) which serves the Public Market and provides additional service coverage will mitigate the equity impacts.	09/05/2022

### New Local Route 24 Bay Street

The new route provides Local service that travels to the Rochester Public Market during the days and times when the Market is open, and provides service to Eastman School of Music, World of Inquiry School #58, Thomas P. Ryan Recreation Center, and John James Audubon School #33 weekdays 5:00 AM to Midnight and weekends 6:00 AM to Midnight. The route travels from the RTS Transit Center > Main Street & Kenilworth Terrace > Bay Street & Niagara Street > Bay Street & Culver Road. As a Local service route, the 24 Bay Street has bus stops spaced every ¼ mile along the route, is served by standard 40-foot buses, and has 30-minute frequency weekdays from 6:00 AM to 6:00 PM. The new route mitigates the equity impacts of discontinuing the 71 Public Market Special. A comparison of the two routes is shown below.



#### 4. Discontinue 98 Lexington Commuter Route

The performance of the 98 Lexington Commuter route is evaluated monthly and consistently shows low ridership, with several months of data showing ridership well below 75% Commuter Average. The ridership in November 2022 was at -%21 compared with -10% ridership in November 2021, showing a persistent declining trend.

Major Service Change	Minority Route	Equity Impacts	Mitigation	Date Effective
Yes	Yes	Disparate Impact and Disproportionate Burden	Yes. Add one more vehicle to the fleet serving the Lexington On Demand Zone to increase capacity from 5:00 AM to 8:00 AM during weekdays. The 98 Lexington route ran within the Lexington On Demand Zone. Commuters can use the On Demand service to reach the same destinations served by the 98 Lexington.	01/02/2023

#### Mitigation for Discontinuing 98 Lexington

The 98 Lexington Commuter:

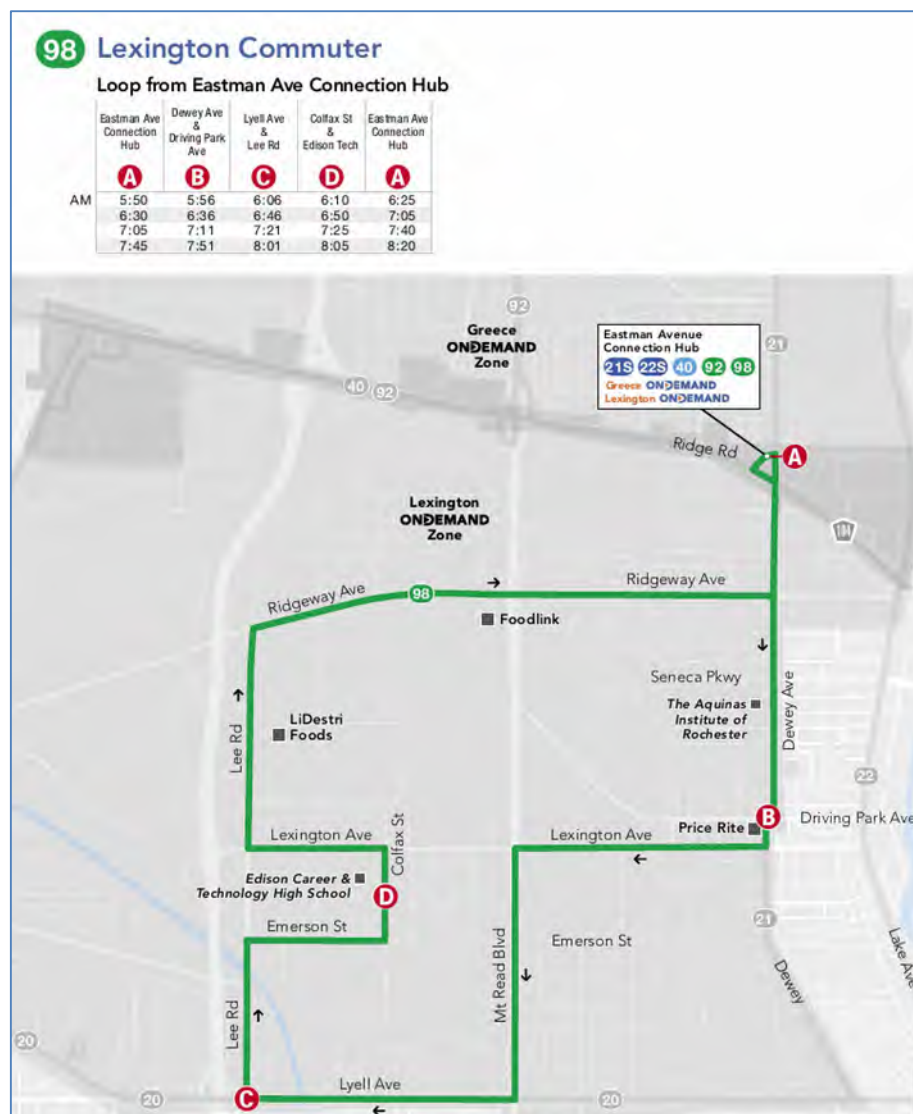
- Travels within the Lexington On Demand Zone, serving Eastman Avenue Connection Hub, Edison Tech High School, and LiDestri Foods; and
- Runs four morning trips during weekdays;
- Operates 5:50 AM to 8:20 AM; and
- Costs \$1 (or \$0.50 reduced fare) per trip; and
- Begins and ends at the Eastman Avenue Connection Hub within the Lexington On Demand Zone.

RTS On Demand service:

- Is available for the commuter destinations during the same days and times that the 98 Lexington is available; and
- Costs \$1 (or \$0.50 reduced fare) per trip to travel to or from the East Avenue Connection Hub.

Adding another vehicle to the On Demand fleet during the 5:00 AM to 8:00 AM window when the commuter trips occur should increase capacity to meet the customer demand indicated by the ridership on the 98 Lexington fixed route. Disparate Impact is mitigated because the same geographic area, destinations, and timeframes are served by the On Demand service.

Disproportionate Burden is mitigated because the fare amount does not change for commuters switching from fixed route to demand responsive.





## MEMORANDUM

To: Dan DeLaus  
From: Dan Kenyon  
Cc: Scott Adair, Julie Boasi, Lea Goodness, Amy Gould, Sara Molyneux  
Date: 12-28-2022  
Re: Major Service Change and Title VI Evaluation - **January 2023** Scheduling Period

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This memo lists any service changes implemented by RTS for the **January 2023** scheduling period and identifies any changes requiring Title VI analysis. These service changes go into effect on January 2, 2023.

The decision for any Title VI evaluation is based on guidelines provided in the “3.0 Major Service Change Policy” section of *TITLE VI PROGRAM POLICIES FOR SERVICE CHANGES & SERVICE MONITORING ON RTS FIXED ROUTES* (approved by the RGRTA Board in September 2020). All Major Service Changes and fare changes to RTS fixed routes are subject to a Title VI Equity Analysis prior to approval by the RGRTA Board of Commissioners.

### Major Service Change

A major service change either:

- Changes the number of service hours operated on any RTS fixed route by 25% or more; or
- Changes the length of the route structure by 25% or more. Route structure refers to the section out of a route based on map coverage rather than based on vehicle miles.

### Exceptions

The following are not considered major service changes:

- Subsidized route extension (business partner)
- Experimental route
- Neighborhood Direct Service (NDS)
- Minor route change
- Minor timing change

All the service changes were reviewed. The table below contains a determination as to whether the change constituted a major service change according to these Title VI guidelines. An impact assessment summary and equity analysis is provided for all major service changes.



## Service Changes Reviewed for January 2023

RTS Routes Number / Name	Potential Action	Exceptions?	25%+ Change in Hours?	25% Change in Length	Major Service Change?
<b>1 St Paul</b>	Remove operational detour at Irondequoit Plaza	Minor routing change	N/A	N/A	No
<b>2 North Clinton</b>	Remove operational detour at Irondequoit Plaza	Minor routing change	N/A	N/A	No
<b>3 Joseph</b>	Minor inbound shifts for blocking on weekdays & weekends	Minor timing change	N/A	N/A	No
<b>4 Hudson</b>	Remove operational detour at Irondequoit Plaza	Minor routing change	N/A	N/A	No
<b>5 Portland</b>	Minor timing adjustments	Minor timing change	N/A	N/A	No
<b>7 Clifford / Empire</b>	Minor inbound shifts for blocking purposes	Minor timing change	N/A	N/A	No
<b>8 East Main</b>	Minimal timing changes	Minor timing change	N/A	N/A	No
<b>9 University</b>	Minor inbound shifts for blocking purposes	Minor timing change	N/A	N/A	No
<b>11 Monroe</b>	Minimal timing changes	Minor timing change	N/A	N/A	No
<b>14 Marketplace</b>	Timing changes on weekdays & weekends	Minor timing change	N/A	N/A	No
<b>16 Genesee</b>	Minor timing changes	Minor timing change	N/A	N/A	No
<b>17 Jefferson / 19<sup>th</sup> Ward</b>	Minor timing changes	Minor timing change	N/A	N/A	No
<b>18 Chili</b>	Rerouted to service new Town Hall at end of line & minor timing changes	Minor timing & routing change	N/A	N/A	No
<b>19 Buffalo Rd.</b>	Minor timing changes	Minor timing change	N/A	N/A	No
<b>20 Lyell</b>	Minor timing changes	Minor timing change	N/A	N/A	No
<b>21 Dewey</b>	Minor timing changes	Minor timing change	N/A	N/A	No
<b>22 Lake</b>	Minor timing changes	Minor timing change	N/A	N/A	No



RTS Routes Number / Name	Potential Action	Exceptions?	25%+ Change in Hours?	25% Change in Length	Major Service Change?
<b>40 Ridge Crosstown</b>	Minor timing changes	Minor timing change	N/A	N/A	No
<b>41 Culver / Goodman Crosstown</b>	Minor timing changes	Minor timing change	N/A	N/A	No
<b>98 - Lexington Commuter</b>	Route discontinued. RTS to service area with On Demand	Major service change	<b>Yes (-100%)</b>	<b>Yes (-100%)</b>	<b>Yes</b>

## Impact Assessment Summary for Routes with Major Service Changes

RTS Route Number / Name	Percent Change in Revenue Hours	Percent Change in Route Miles	Impact Assessment Summary
<b>98 - Lexington Commuter</b>	-100%	-100%	Route discontinued. Area to be serviced with On Demand. See Equity Analysis below.

## Equity Analyses

Title VI Equity Analyses for routes with major service changes were conducted by the RTS Business Analyst II in accordance with the criteria and thresholds for *Disparate Impact* and *Disproportionate Burden* outlined in the Authority's [Title VI Program Policies for Service Changes and Service Monitoring on RTS Fixed Routes](#).

The resulting conclusions are as follows:

- The removal of **Route 98 - Lexington Commuter** does cause a disparate impact/disproportionate burden.
- **Route 98 - Lexington Commuter** currently operates in areas with 75% minority and 28% low-income populations, which are higher than the set criteria of 38% minority and 19% low income.
- RTS will provide On Demand service with an additional vehicle for this area, which mitigates the impact.

## Bus Stops and Bus Shelters

Below are **bus stops** installed and/or removed from service for the January 2023 scheduling period:

Installed	
Route(s)	Bus Stop Location
18	Chili & Chili Town Hall (Outbound)
18	Chili & Chili Town Hall (Inbound)

Removed			
Route(s)	Bus Stop Location	Route(s)	Bus Stop Location
98	Lexington & Norman	98	Lee & LiDestri
98	Emerson & W	98	Ridgeway & McLaughlin
98	Colfax & opp 575 Colfax	98	Ridgeway & Hollywood
98	Lexington & Kodak Distribution Ctr		

Below are **bus shelters** installed and/or removed from service for the January 2023 scheduling period:

Installed	
Route(s)	Bus Shelter Location
18	Chili & Wegman

Removed	
Route(s)	Bus Shelter Location
12	Rue De Ville & 121 Rue De Ville
13	South & Elmwood



## MEMORANDUM

To: Dan DeLaus  
From: Dan Kenyon  
Cc: Scott Adair, Julie Boasi, Lea Goodness, Amy Gould, Sara Molyneux  
Date: 3-28-2022  
Re: Major Service Change and Title VI Evaluation, **April 2022** Scheduling Period

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This memo lists any service changes implemented by RTS for the April 2022 scheduling period and identifies any changes requiring Title VI analysis. These service changes go into effect on April 4, 2022.

The decision for any Title VI evaluation is based on guidelines provided in the “3.0 Major Service Change Policy” section of *TITLE VI PROGRAM POLICIES FOR SERVICE CHANGES & SERVICE MONITORING ON RTS FIXED ROUTES* (approved by the RGRTA Board in September 2020). All Major Service Changes and fare changes to RTS fixed routes are subject to a Title VI Equity Analysis prior to approval by the RGRTA Board of Commissioners.

### Major Service Change

A major service change either:

- Changes the number of service hours operated on any RTS fixed route by 25% or more; or
- Changes the length of the route structure by 25% or more. Route structure refers to the section out of a route based on map coverage rather than based on vehicle miles.

### Exceptions

The following are not considered major service changes:

- Subsidized route extension (business partner)
- Experimental route
- Neighborhood Direct Service
- Minor route change
- Minor timing change

All the service changes were reviewed. The table below contains a determination as to whether the change constituted a major service change according to these Title VI guidelines.

## Service Changes Reviewed for April 2022

RTS Routes Number / Name	Potential Action	Exceptions?	25%+ Change in Hours?	25% Change in Length	Major Service Change?
<b>1</b> <b>St Paul</b>	Minor re-routing at end of line. Final destination TBD	Minor route change	N/A	N/A	No
<b>2</b> <b>North Clinton</b>	Minor re-routing at end of line. Final destination TBD	Minor route change	N/A	N/A	No
<b>4</b> <b>Hudson</b>	Minor re-routing at end of line. Final destination TBD	Minor route change	N/A	N/A	No
<b>7</b> <b>Clifford / Empire</b>	Timing changes	Minor timing change	N/A	N/A	No
<b>8</b> <b>East Main</b>	Timing changes	Minor timing change	N/A	N/A	No
<b>11</b> <b>Monroe</b>	Timing changes	Minor timing change	N/A	N/A	No
<b>12</b> <b>South Clinton</b>	Timing changes	Minor timing change	N/A	N/A	No
<b>14</b> <b>Marketplace</b>	Timing changes	Minor timing change	N/A	N/A	No
<b>17</b> <b>Jefferson / 19<sup>th</sup> Ward</b>	Timing changes	Minor timing change	N/A	N/A	No
<b>21</b> <b>Dewey</b>	Timing changes	Minor timing change	N/A	N/A	No
<b>41</b> <b>Culver / Goodman Crosstown</b>	Timing changes	Minor timing change	N/A	N/A	No
<b>42</b> <b>Lyell / Upper Falls Crosstown</b>	Route discontinued	Experimental*	N/A	N/A	No
<b>70</b> <b>Seabreeze - Seasonal</b>	Added seasonal route back. Runs from May 1 to September 30	Minor route change	N/A	N/A	No
<b>91</b> <b>Newark / Lyons Commuter</b>	Combined route with the 96 St John Fisher Express and made minor timing adjustments	Minor timing change. No change in route	N/A	N/A	No
<b>96</b> <b>St John Fisher Express</b>	Eliminated route. Combined route with the 91 Newark / Lyons Commuter	No change in route	N/A	N/A	No

\*In service less than 1 year

## Bus Stops and Bus Shelters

Below are **bus stops** installed and/or removed from service for the April 2022 scheduling period:

Installed / Added	
Route(s)	Bus Stop Location
N/A	NONE

Removed			
Route	Bus Stop Location	Route	Bus Stop Location
42	Bausch & St Paul	42	Cleveland & North
42	Upper Falls & Clinton	42	Draper & Portland
42	Upper Falls & Clinton	42	Upper Falls & St. Paul
42	Upper Falls & Joseph	42	Smith & Vincent
42	Upper Falls & Joseph	42	Gates Plaza
42	Upper Falls & Hudson		

Below are **bus shelters** installed and/or removed from service for the April 2022 scheduling period:

Installed	
Route(s)	Bus Shelter Location
N/A	NONE

Removed	
Route(s)	Bus Shelter Location
N/A	NONE



## MEMORANDUM

To: Dan DeLaus  
From: Dan Kenyon  
Cc: Scott Adair, Julie Boasi, Lea Goodness, Amy Gould, Sara Molyneux  
Date: 6-22-2022  
Re: Major Service Change and Title VI Evaluation, **June 2022** Scheduling Period

---

This memo lists any service changes implemented by RTS for the June 2022 scheduling period and identifies any changes requiring Title VI analysis. These service changes go into effect on June 27, 2022.

The decision for any Title VI evaluation is based on guidelines provided in the “3.0 Major Service Change Policy” section of *TITLE VI PROGRAM POLICIES FOR SERVICE CHANGES & SERVICE MONITORING ON RTS FIXED ROUTES* (approved by the RGRTA Board in September 2020). All Major Service Changes and fare changes to RTS fixed routes are subject to a Title VI Equity Analysis prior to approval by the RGRTA Board of Commissioners.

### Major Service Change

A major service change either:

- Changes the number of service hours operated on any RTS fixed route by 25% or more; or
- Changes the length of the route structure by 25% or more. Route structure refers to the section out of a route based on map coverage rather than based on vehicle miles.

### Exceptions

The following are not considered major service changes:

- Subsidized route extension (business partner)
- Experimental route
- Neighborhood Direct Service
- Minor route change
- Minor timing change

All the service changes were reviewed. The table below contains a determination as to whether the change constituted a major service change according to these Title VI guidelines. When necessary, an impact assessment summary is provided for all major service changes.



## Service Changes Reviewed for June 2022

RTS Routes Number / Name	Potential Action	Exceptions?	25%+ Change in Hours?	25% Change in Length	Major Service Change?
<b>2</b> <b>North Clinton</b>	Removed RCSD deviation for the summer	Minor route change	N/A	N/A	No
<b>5</b> <b>Portland</b>	Removed RCSD deviation for the summer	Minor route change	N/A	N/A	No
<b>6</b> <b>Goodman</b>	Removed RCSD deviation for the summer	Minor route change	N/A	N/A	No
<b>8</b> <b>East Main</b>	Timing changes	Minor timing change	N/A	N/A	No
<b>9</b> <b>University</b>	Removed RCSD deviation for the summer	Minor route change	N/A	N/A	No
<b>14</b> <b>Marketplace</b>	Timing changes	Minor timing change	N/A	N/A	No
<b>22</b> <b>Lake</b>	Timing changes	Minor timing change	N/A	N/A	No
<b>40</b> <b>Ridge Crosstown</b>	Timing changes	Minor timing change	N/A	N/A	No
<b>50</b> <b>Fairport - Penfield</b>	Timing changes	Minor timing change	N/A	N/A	No

## Bus Stops and Bus Shelters

Below are **bus stops** installed and/or removed from service for the June 2022 scheduling period:

Installed / Added	
Route(s)	Bus Stop Location
N/A	NONE

Removed	
Route	Bus Stop Location
N/A	NONE

Below are **bus shelters** installed and/or removed from service for the June 2022 scheduling period:

Installed / Added	
Route(s)	Bus Shelter Location
N/A	NONE

Removed	
Route(s)	Bus Shelter Location
22 - Lake	Lake & Latta



## MEMORANDUM

To: Dan DeLaus  
From: Dan Kenyon  
Cc: Scott Adair, Julie Boasi, Lea Goodness, Amy Gould, Sara Molyneux  
Date: 8-31-2022  
Re: Major Service Change and Title VI Evaluation, **September 2022** Scheduling Period

---

This memo lists any service changes implemented by RTS for the September 2022 scheduling period and identifies any changes requiring Title VI analysis. These service changes go into effect on September 5, 2022.

The decision for any Title VI evaluation is based on guidelines provided in the “3.0 Major Service Change Policy” section of *TITLE VI PROGRAM POLICIES FOR SERVICE CHANGES & SERVICE MONITORING ON RTS FIXED ROUTES* (approved by the RGRTA Board in September 2020). All Major Service Changes and fare changes to RTS fixed routes are subject to a Title VI Equity Analysis prior to approval by the RGRTA Board of Commissioners.

### Major Service Change

A major service change either:

- Changes the number of service hours operated on any RTS fixed route by 25% or more; or
- Changes the length of the route structure by 25% or more. Route structure refers to the section out of a route based on map coverage rather than based on vehicle miles.

### Exceptions

The following are not considered major service changes:

- Subsidized route extension (business partner)
- Experimental route
- Neighborhood Direct Service (NDS)
- Minor route change
- Minor timing change

All the service changes were reviewed. The table below contains a determination as to whether the change constituted a major service change according to these Title VI guidelines. An impact assessment summary and equity analysis is provided for all major service changes.

## Service Changes Reviewed for September 2022

RTS Routes Number / Name	Potential Action	Exceptions?	25%+ Change in Hours?	25% Change in Length	Major Service Change?
<b>1 St Paul</b>	Shifted IB trips on weekdays (for blocking)	Minor timing change	N/A	N/A	No
<b>2 North Clinton</b>	Added RCSD Cooper Loop deviation and minor timing changes	Minor route & timing change	N/A	N/A	No
<b>3 Joseph</b>	Added RCSD Cooper Loop deviation and minor timing changes	Minor route & timing change	N/A	N/A	No
<b>4 Hudson</b>	Added one 6:55 AM IB trip	Minor timing change	N/A	N/A	No
<b>5 Portland</b>	Re-routed via Culver, 104 Service Rd. Re-timed all weekday and weekends. Added trip to Bishop Kearney HS	Minor route & timing change	N/A	N/A	No
<b>6 North Goodman</b>	Added trips for Bishop Kearney High School	Minor route & timing change	N/A	N/A	No
<b>7 Clifford / Empire</b>	Shifted IB trips on weekdays (for blocking)	Minor timing change	N/A	N/A	No
<b>8 East Main</b>	Minimal timing changes	Minor timing change	N/A	N/A	No
<b>9 University</b>	Shifted IB trips on weekdays (for blocking). Added Mercy High School trips	Minor route & timing change	N/A	N/A	No
<b>10 Park</b>	Re-routed via Main St to East Ave	Minor route change	N/A	N/A	No
<b>11 Monroe</b>	OTP timing changes weekdays & weekends	Minor timing change	N/A	N/A	No
<b>13 South Ave.</b>	Shifted trips to alternate with <u>Route 14</u> at (Artic) gate on weekdays & weekends	Minor timing change	N/A	N/A	No
<b>14 Marketplace</b>	Shifted trips to alternate with <u>Route 13</u> at (Artic) gate on weekdays & weekends	Minor timing change	N/A	N/A	No
<b>16 Genesee</b>	Minor timing changes. Added a 6:45 AM OB trip on weekends	Minor timing change	N/A	N/A	No
<b>17 Jefferson / 19<sup>th</sup> Ward</b>	OTP changes on weekdays and weekends	Minor timing change	N/A	N/A	No
<b>18 Chili</b>	Shifted trips for blocking weekday and weekends	Minor timing change	N/A	N/A	No
<b>19 Buffalo Rd.</b>	OTP changes on weekdays and weekends	Minor timing change	N/A	N/A	No

RTS Routes Number / Name	Potential Action	Exceptions?	25%+ Change in Hours?	25% Change in Length	Major Service Change?
<b>20 Lyell</b>	Minor timing changes	Minor timing change	N/A	N/A	No
<b>21 Dewey</b>	Minor shifts for blocking	Minor timing change	N/A	N/A	No
<b>22 Lake</b>	Minor timing changes & shifted late night trips to make lineup. Added 6AM weekend OB trip.	Minor timing change	N/A	N/A	No
<b>23 West Ave. / Airport</b>	Shifted trips for blocking	Minor timing change	N/A	N/A	No
<b>24 Bay St.</b>	Added New Route	N/A	Yes +100%	Yes +100%	Yes
<b>40 Ridge Crosstown</b>	Time shifts for blocking and for OTP	Minor timing change	N/A	N/A	No
<b>41 Culver / Goodman Crosstown</b>	OTP changes on weekdays and weekends	Minor timing change	N/A	N/A	No
<b>50 Fairport / Penfield</b>	Minor timing changes	Minor timing change	N/A	N/A	No
<b>70 Seabreeze - Seasonal</b>	Minor timing changes, runs until Sept 30	Minor timing change	N/A	N/A	No
<b>71 Public Market Special</b>	Discontinued route	N/A	Yes (-100%)	Yes (-100%)	Yes
<b>91 - Newark / Lyons Commuter</b>	OTP changes	Minor timing change	N/A	N/A	No
<b>92 - Hilton / Hamlin Commuter</b>	OTP changes	Minor timing change	N/A	N/A	No
<b>97 - Elmwood Commuter</b>	OTP changes	Minor timing change	N/A	N/A	No

## Impact Assessment Summary for Routes with Major Service Changes

RTS Route Number / Name	Percent Change in Revenue Hours	Percent Change in Route Miles	Impact Assessment Summary
<b>24 - Bay St.</b>	+100%	+100%	New Route. Service improvement.
<b>71 - Public Market Special</b>	-100%	-100%	Route discontinued due to the addition of new Route 24. Service improvement. See Equity Analysis below.

## Equity Analyses

Title VI Equity Analyses for routes with major service changes were conducted by the RTS Business Analyst II in accordance with the criteria and thresholds for *Disparate Impact* and *Disproportionate Burden* outlined in the Authority's [Title VI Program Policies for Service Changes and Service Monitoring on RTS Fixed Routes](#).

The resulting conclusions are as follows:

- The removal of **Route 71 - Public Market Special** does cause a disparate impact/disproportionate burden; however, the addition of **Route 24 - Bay St.** entirely mitigates it.
- **Route 71** currently serves areas with 66.9% minority and 41.4% low-income populations.
- The addition of **Route 24** will serve an area with 74.9% minority and 37.9% low-income populations and will provide more frequent service available in areas formerly served by **Route 71**.



## Bus Stops and Bus Shelters

Below are **bus stops** installed and/or removed from service for the September 2022 scheduling period:

Installed / Added	
Route(s)	Bus Stop Location
N/A	NONE

Removed	
Route(s)	Bus Stop Location
N/A	NONE

Below are **bus shelters** installed and/or removed from service for the September 2022 scheduling period:

Installed	
Route(s)	Bus Shelter Location
N/A	NONE

Removed	
Route(s)	Bus Shelter Location
2 - North Clinton	Clinton & Bloomingdale (Hickey Freeman)



## MEMORANDUM

To: Dan DeLaus  
From: Dan Kenyon  
Cc: Julie Boasi, Lea Goodness, Sara Molyneux, Miguel Velazquez  
Date: 12-14-2021  
Re: Major Service Change and Title VI Evaluation, **January 2022** Scheduling Period

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This memo lists any service changes implemented by RTS for the January 2022 scheduling period and identifies any changes requiring Title VI analysis. These service changes go into effect on January 3, 2022.

The decision for any Title VI evaluation is based on guidelines provided in the "3.0 Major Service Change Policy" section of *TITLE VI PROGRAM POLICIES FOR SERVICE CHANGES & SERVICE MONITORING ON RTS FIXED ROUTES* (approved by the RGRTA Board in September 2020). All Major Service Changes and fare changes to RTS fixed routes are subject to a Title VI Equity Analysis prior to approval by the RGRTA Board of Commissioners.

### Major Service Change

A major service change either:

- Changes the number of service hours operated on any RTS fixed route by 25% or more; or
- Changes the length of the route structure by 25% or more. Route structure refers to the section out of a route based on map coverage rather than based on vehicle miles.

### Exceptions

The following are not considered major service changes:

- Subsidized route extension (business partner)
- Experimental route
- Neighborhood Direct Service
- Minor route change
- Minor timing change

All the service changes were reviewed. The tables below on pages 2 & 3 contain a determination as to whether the change constituted a major service change according to these Title VI guidelines. An impact assessment summary is provided for all major service changes on page 3.

## Service Changes Reviewed for January 2022

RTS Routes Number / Name	Potential Action	Exceptions?	25%+ Change in Hours?	25% Change in Length	Major Service Change?
<b>2</b> North Clinton	Timing changes	Minor timing change	N/A	N/A	No
<b>3</b> Joseph	Rerouted OB end of line to connect with 4 - Hudson; Timing changes	Minor route & timing change	N/A	N/A	No
<b>5</b> Portland	Timing changes	Minor timing change	N/A	N/A	No
<b>7</b> Clifford / Empire	Timing changes	Minor timing change	N/A	N/A	No
<b>8</b> East Main	Added back 15-minute frequent service	N/A	Yes (+66%)	N/A	Yes
<b>11</b> Monroe	Added trippers for Pittsford Mendon school service	Business Partner	N/A	N/A	No
<b>13</b> South Avenue	Timing changes	Minor timing change	N/A	N/A	No
<b>14</b> Marketplace	Timing changes	Minor timing change	N/A	N/A	No
<b>15</b> Plymouth	Rerouted IB & OB to connect with routes on W. Main Street; Timing changes	Minor route & timing change	N/A	N/A	No
<b>16</b> Genesee	Added back 15-minute frequent service; Timing changes	N/A	Yes (+66%)	N/A	Yes
<b>17</b> Jefferson / 19 <sup>th</sup> Ward	Timing changes	Minor timing change	N/A	N/A	No
<b>18</b> Chili	Timing changes	Minor timing change	N/A	N/A	No
<b>19</b> Buffalo Road	Timing changes	Minor timing change	N/A	N/A	No
<b>20</b> Lyell	Timing changes	Minor timing change	N/A	N/A	No
<b>21</b> Dewey	Rerouted OB via Plymouth to Lyell & IB State to Main; Started first IB trip w/long line; Timing changes	Minor route & timing changes	N/A	N/A	No
<b>22</b> Lake	Timing changes	Minor timing change	N/A	N/A	No
<b>23</b> West Ave. / Airport	Timing changes	Minor timing change	N/A	N/A	No

RTS Routes Number / Name	Potential Action	Exceptions?	25%+ Change in Hours?	25% Change in Length	Major Service Change?
<b>40</b> Ridge Crosstown	Timing changes	Minor timing change	N/A	N/A	No
<b>41</b> Culver / Goodman Crosstown	Timing changes	Minor timing change	N/A	N/A	No
<b>74</b> Tiger East End Express	Decreased from two buses to one	Business Partner	N/A	N/A	No
<b>90</b> Avon / Rush Commuter	Discontinued route	N/A	Yes (-100%)	Yes (-100%)	Yes
<b>91</b> Newark / Lyons Commuter	Timing shifts	Minor timing change	N/A	N/A	No
<b>92</b> Hilton / Hamlin Commuter	Eliminated one AM & one PM trip	N/A	Yes -50%	N/A	Yes
<b>97</b> Elmwood Commuter	Timing changes	Minor timing change	N/A	N/A	No
<b>98</b> Lexington Commuter	Added one trip; Timing changes	N/A	Yes (+33%)	N/A	Yes

### Impact Assessment Summary for Routes with Major Service Changes

RTS Route Number / Name	Percent Minority*	Percent Low-Income*	Impact Assessment Summary
<b>8 East Main</b>	N/A	N/A	Service Improvement. No impact.
<b>16 Genesee</b>	N/A	N/A	Service Improvement. No impact.
<b>90</b> Avon / Rush Commuter	23%	9%	Route discontinued due to poor performance. Service reductions do not trigger disparate impacts or disproportionate burdens.
<b>92</b> Hilton / Hamlin Commuter	19%	13%	Two of four total trips discontinued due to poor performance. Service reductions do not trigger disparate impacts or disproportionate burdens.
<b>98</b> Lexington Commuter	N/A	N/A	Service Improvement. No impact.

## Equity Analyses

Title VI Equity Analyses for routes with major service changes were conducted by the RTS Business Analyst II in accordance with the criteria and thresholds for *Disparate Impact* and *Disproportionate Burden* outlined in the Authority's [Title VI Program Policies for Service Changes and Service Monitoring on RTS Fixed Routes](#).

The resulting conclusions are as follows:

- Service Area is 38% minority, 19% low income
- Route 90: 23% minority, 9% low income
- Route 92: 19% minority, 13% low income

The service reductions do not trigger disparate impacts or disproportionate burdens as both routes in question have minority and low-income populations below that of the service area as a whole.

## Bus Stops and Bus Shelters

Below are **bus stops** installed and/or removed from service for the January 2022 scheduling period:

Installed / Added	
Route(s)	Bus Stop Location
5,6,40,41,70	Skyview Senior Housing

Removed			
Route	Bus Stop Location	Route	Bus Stop Location
21	Smith & Oak	90	Rochester & Gale
21	Oak & Jay	90	Rochester & Main
21	Saratoga & Smith	90	Rochester & Main
90	E Henrietta & 2500 E Henrietta	90	Rochester & Ziegler
90	E Henrietta & 5000 E Henrietta	90	Routes 5 & 20 & Harper Park
90	E Henrietta & Erie Station	90	Routes 5 & 20 & Harper Park
90	E Henrietta & Erie Station	90	Routes 5 & 20 & Lakeville
90	E Henrietta & Lehigh Station	90	Routes 5 & 20 & Route 15
90	E Henrietta & Lehigh Station	90	Spring & Sackett
90	E Henrietta & Palamino	90	E Henrietta & Route 251
90	E Henrietta & Ward Hill	90	Main St & Pine Trail (Honeoye Falls)
90	E Henrietta & Ward Hill	90	11 E Main - Avon

90	Genesee & Avon Village Hall	90	7277 W Main - Lima
90	Monroe & 12 Monroe	90	Rush Park & Ride
90	Monroe & 13 Monroe	90	Main St. & opp Pine Trail (Honeoye Falls)
90	Monroe & Maplewood	90	E Henrietta & Wedgewood West Apts.
90	Monroe & Maplewood	90	E Henrietta & 2535 E Henrietta
90	Rochester & 1613 Rochester	90	Route 251 & E. Henrietta
90	Rochester & Gale		

Below are **bus shelters** installed and/or removed from service for the January 2022 scheduling period:

Installed	
Route(s)	Bus Shelter Location
21,22,40,92,98	Eastman Connection Hub

Removed	
Route(s)	Bus Shelter Location
Not on a current route	Farmington & Winton
Not on a current route	St Paul & Thomas
Not on a current route	Hall of Justice





## MEMORANDUM

To: Dan DeLaus  
From: Dan Kenyon  
Cc: Miguel Velazquez, Lea Goodness, Julie Boasi, Sara Molyneux  
Date: 3-25-2021  
Re: Major Service Change and Title VI Evaluation, **April 2021** Scheduling Period

---

This memo lists any service changes implemented by RTS for the April 2021 scheduling period and identifies any changes requiring Title VI analysis. These service changes go into effect on April 5, 2021.

The decision for any Title VI evaluation is based on guidelines provided in the “3.0 Major Service Change Policy” section of *TITLE VI PROGRAM POLICIES FOR SERVICE CHANGES & SERVICE MONITORING ON RTS FIXED ROUTES* (adopted by the RGRTA Board in May 2017). All Major Service Changes and fare changes to RTS fixed routes are subject to a Title VI Equity Analysis prior to approval by the RGRTA Board of Commissioners.

### Major Service Change

A major service change either:

- Changes the number of service hours operated on any RTS fixed route by 25% or more; or
- Changes the length of the route structure by 25% or more. Route structure refers to the section out of a route based on map coverage rather than based on vehicle miles.

### Exceptions

The following are not considered major service changes:

- Subsidized route extension (business partner)
- Experimental route
- Express transfer service
- Minor route change
- Minor timing change

All of the service changes were reviewed. The table below contains a determination as to whether the change constituted a major service change according to these Title VI guidelines.

## Service Changes Reviewed for April 2021

Route(s)	Potential Action	Exceptions?	25%+ Change in Hours?	25% Change in Length	Major Service Change?
53	Removed service to: VA Note: VA was relocated to Henrietta	Business Partner	N/A	N/A	No

Additional notes since the previous Major Service Change and Title VI Evaluation Memo:

- The following bus stops were physically installed/removed for the April 2021 scheduling period:

Installed / Added	
Route	Bus Stop Location
84	Eastview Mall Sears entrance relocated to Entrance 3

Removed	
Route	Bus Stop Location
	NONE

- The following bus shelters were physically installed/removed for the April 2021 scheduling period:

Installed	
Route(s)	Bus Shelter Location
	NONE

Removed	
Route(s)	Bus Shelter Location
	NONE



## MEMORANDUM

To: Dan DeLaus  
From: Dan Kenyon  
Cc: Miguel Velazquez, Lea Goodness, Julie Boasi, Sara Molyneux  
Date: 5-10-2021  
Re: Major Service Change and Title VI Evaluation, **May 2021 - Reimagine RTS** Scheduling Period

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This memo lists any service changes implemented by RTS for the May 2021 - Reimagine RTS scheduling period which is in lieu of the typical June 2021 scheduling period. The memo identifies any changes requiring Title VI analysis. These service changes go into effect on May 17, 2021.

The decision for any Title VI evaluation is based on guidelines provided in the “3.0 Major Service Change Policy” section of *TITLE VI PROGRAM POLICIES FOR SERVICE CHANGES & SERVICE MONITORING ON RTS FIXED ROUTES* (adopted by the RGRTA Board in May 2017). All Major Service Changes and fare changes to RTS fixed routes are subject to a Title VI Equity Analysis prior to approval by the RGRTA Board of Commissioners.

### Major Service Change

A major service change either:

- Changes the number of service hours operated on any RTS fixed route by 25% or more; or
- Changes the length of the route structure by 25% or more. Route structure refers to the section out of a route based on map coverage rather than based on vehicle miles.

### Exceptions

The following are not considered major service changes:

- Subsidized route extension (business partner)
- Experimental route
- Express transfer service
- Minor route change
- Minor timing change

The “Reimagine RTS Title VI Service Equity Analysis” was performed by 3<sup>rd</sup> party vendor Transportation Management & Design, Inc. (TMD) in August 2018 using the criteria defined in the “Title VI Program Policies for Service Changes and Service Monitoring on RTS Fixed Routes, Effective 5/17/2017” and data from the 2016 American Community Survey (ACS) 5-year estimates, the 2017 RTS Origin-Destination survey, and the 2017 HHS federal poverty guideline.

All the service changes were reviewed. The following tables on pages 2 and 3 contain a determination as to whether the change constituted a major service change according to these Title VI guidelines.

## Service Changes Reviewed for May 2021 (Reimagine RTS)

### Determination of Major Service Changes by Service Hours and Route Length

Route	Existing Revenue Hours	Proposed Revenue Hours	Change (Proposed - Existing)	Percent Change	Existing Route Length In Miles	Proposed Route Length in Miles	Change (Proposed - Existing)	Percent Change	Major Service Change: Yes or No?
1 - Lake	51.50	56.87	5.37	10%	8.1	8.2	0.1	1%	No
3 - Lyell (+ New Lyell - Upper Falls CT)	51.40	67.57	16.17	31%	7.4	13.6	6.2	84%	Yes
4 - Genesee	30.97	49.98	19.01	61%	4.7	4.7	0.0	0%	Yes
6 - Jefferson Ave	25.92		-25.92	-100%	5.4		-5.4	-100%	Yes
8 - Chili	30.12	62.23	32.11	107%	9.6	9.6	0.0	0%	Yes
9 - Jay/Maple	25.55	36.48	10.93	43%	6.5	9.2	2.7	42%	Yes
10 - Dewey	39.30	71.75	32.45	83%	13.1	7.5	-5.6	-43%	Yes
11 - (New Culver Rd CT)		52.27	52.27	100%		12.7	12.7	100%	Yes
13 - Edison	12.60		-12.60	-100%	5.7		-5.7	-100%	Yes
14 - Ridge Rd (New Ridge Rd CT)	19.30	36.80	17.50	91%	9.9	8.7	-1.2	-12%	Yes
15 - Latta	19.10		-19.10	-100%	12.3		-12.3	-100%	Yes
16 - Crosstown/Driving Park/Emerson	16.28		-16.28	-100%	8.2		-8.2	-100%	Yes
19 - Plymouth	28.60	26.52	-2.08	-7%	6.7	4.7	-2.0	-30%	Yes
23 - Jefferson Rd	25.45		-25.45	-100%	10.5		-10.5	-100%	Yes
24 - Marketplace Mall/RIT	25.87	39.88	14.01	54%	9.2	9.1	-0.1	-1%	Yes
25 - Thurston/MCC	28.27	35	6.73	24%	9.1	9.6	0.5	5%	No
28 - Genesee Park/Strong	30.18		-30.18	-100%	6.5		-6.5	-100%	Yes
31 - Park Ave	21.08	22.13	1.05	5%	3.6	3.5	-0.1	-3%	No
33 - Goodman	27.53	23.58	-3.95	-14%	6.3	4.4	-1.9	-30%	Yes
34 - Hudson	35.63	45.48	9.85	28%	4.5	4.0	-0.5	-11%	Yes
35 - St. Paul	39.03	22.50	-16.53	-42%	7.8	5.0	-2.8	-36%	Yes
36 - Clifford Ave	24.05		-24.05	-100%	4.7		-4.7	-100%	Yes
37 - Clinton	29.02	22.62	-6.40	-22%	4.9	4.9	0.0	0%	No
38 - East Main	32.00	38.68	6.68	21%	4.1	3.3	-0.8	-20%	No
39 - Bay/Webster Ave	15.35		-15.35	-100%	4.5		-4.5	-100%	Yes
40 - Portland	44.22	52.65	8.43	19%	7.4	3.2	-4.2	-57%	Yes

**Determination of Major Service Changes by Service Hours and Route Length (cont.)**

Route	Existing Revenue Hours	Proposed Revenue Hours	Change (Proposed - Existing)	Percent Change	Existing Route Length in Miles	Proposed Route Length in Miles	Change (Proposed - Existing)	Percent Change	Major Service Change: Yes or No?
(New Seabreeze Seasonal)		13.52	13.52	100%		4.2	4.2	100%	Yes
41 - Joseph Ave	17.97	42.97	25.00	139%	3.5	3.4	-0.1	-3%	Yes
42 - Parsells	22.08		-22.08	-100%	4.6		-4.6	-100%	Yes
45 - South Ave	27.72	22.03	-5.69	-21%	5.0	4.5	-0.5	-10%	No
47 - Monroe	43.35	49.65	6.30	15%	7.4	5.4	-2.0	-27%	Yes
48 - University	33.83	18.20	-15.63	-46%	5.8	3.4	-2.4	-41%	Yes
51 - S. Clinton	11.17	20.48	9.31	83%	4.0	3.8	-0.2	-5%	Yes
53 - S. Goodman	13.60		-13.60	-100%	6.1		-6.1	-100%	Yes
57 - East Ave	8.03		-8.03	-100%	8.3		-8.3	-100%	Yes
81 - East Rochester - Fairport	22.68	15.77	-6.91	-30%	16.6	11.9	-4.7	-28%	Yes
82 - Penfield	7.15		-7.15	-100%	10.7		-10.7	-100%	Yes
83 - Calkins Rd	8.12		-8.12	-100%	8.9		-8.9	-100%	Yes
84 - Perinton/Eastview	12.38		-12.38	-100%	16.6		-16.6	-100%	Yes
101 - Avon/Rush Park & Ride	4.95		-4.95	-100%	28.4		-28.4	-100%	Yes
102 - Newark/Lyons	4.92		-4.92	-100%	39.1		-39.1	-100%	Yes
103 - Webster	15.22	26.27	11.05	73%	14.9	7.4	-7.5	-50%	Yes
104 - Brockport	18.72		-18.72	-100%	22.3		-22.3	-100%	Yes
106 - Hilton/Hamlin/Clarkson	6.08		-6.08	-100%	31.2		-31.2	-100%	Yes
124 - Marketplace ROC-it	8.98		-8.98	-100%	5.9		-5.9	-100%	Yes
134 - Hudson ROC-it	5.67		-5.67	-100%	4.3		-4.3	-100%	Yes
145 - South Ave ROC-it	12.05		-12.05	-100%	5.4		-5.4	-100%	Yes
150 - Dewey ROC-it	26.05		-26.05	-100%	7.3		-7.3	-100%	Yes
163 - Lyell ROC-it	10.07		-10.07	-100%	8.4		-8.4	-100%	Yes
<b>Total/Sum of All Routes</b>	<b>1,069.11</b>	<b>971.88</b>	<b>-97.23</b>	<b>-9%</b>	<b>445.4</b>	<b>169.9</b>	<b>-275.5</b>	<b>-62%</b>	<b>--</b>

With the necessary data an assessment step was completed to evaluate the impacts to ensure adverse effects are not being distributed unfairly. A demographic summary of routes with major service changes is provided in the following tables on pages 4 through 6 (Impact Assessment).

Routes where the service change represents a service improvement for a route with above average minority and/or low-income population and/or ridership are highlighted in grey. As these represent an improvement, no further analysis is required. Routes with below average minority and/or low-income population and/or ridership that are undergoing service reductions also do not trigger any service equity concerns and are highlighted in grey.

**Impact Assessment by Route (pages 4-6)**

Route Name	Percent Change in Revenue Hours	Percent Change in Route Miles	Minority Population Living within ½ mile of Route (ACS)	Low-Income Population Living within ½ mile of Route (ACS)	Minority Share of Ridership (2017 O-D Survey)	Low- Income Share of Ridership (2017 O-D Survey)	Impact Assessment
3 - Lyell	31%	84%	52%	29%	71%	73%	Service Improvement. No mitigating efforts required.
4 - Genesee	61%	0%	72%	31%	88%	81%	Service Improvement. No mitigating efforts required.
6 - Jefferson Ave	-100%	-100%	72%	32%	92%	73%	See “Mitigation Considerations” following the table.
8 - Chili	107%	0%	58%	26%	81%	75%	Service Improvement. No mitigating efforts required.
9 - Jay/Maple	43%	42%	60%	33%	84%	62%	Service Improvement. No mitigating efforts required.
10 - Dewey	83%	-43%	42%	25%	75%	79%	Net service improvement. No mitigating efforts required.
13 - Edison	-100%	-100%	71%	38%	89%	67%	See “Mitigation Considerations” following the table.
14 - Ridge Rd	91%	-12%	53%	28%	75%	64%	Service Improvement. No mitigating efforts required.
15 - Latta	-100%	-100%	38%	24%	54%	80%	See “Mitigation Considerations” following the table.
16 - Crosstown/Driving Park/Emerson	-100%	-100%	70%	37%	84%	77%	See “Mitigation Considerations” following the table.
19 - Plymouth	-7%	-30%	64%	31%	79%	66%	See “Mitigation Considerations” following the table.
23 - Jefferson Rd	-100%	-100%	43%	22%	70%	72%	See “Mitigation Considerations” following the table.
24 - Marketplace Mall/RIT	54%	-1%	44%	23%	79%	70%	Net service improvement. No mitigating efforts required.
28 - Genesee Park/Strong	-100%	-100%	68%	30%	87%	67%	See “Mitigation Considerations” following the table.
33 - Goodman	-14%	-30%	58%	26%	80%	75%	See “Mitigation Considerations” following the table.
34 - Hudson	28%	-11%	70%	37%	85%	76%	Net service improvement. No mitigating efforts required.
35 - St. Paul	-42%	-36%	51%	28%	72%	74%	See “Mitigation Considerations” following the table.



Route Name	Percent Change in Revenue Hours	Percent Change in Route Miles	Minority Population Living within ½ mile of Route (ACS)	Low-Income Population Living within ½ mile of Route (ACS)	Minority Share of Ridership (2017 O-D Survey)	Low- Income Share of Ridership (2017 O-D Survey)	Impact Assessment
36 - Clifford Ave	-100%	-100%	73%	34%	89%	75%	See “Mitigation Considerations” following the table.
39 - Bay/Webster Ave	-100%	-100%	68%	35%	78%	77%	See “Mitigation Considerations” following the table.
40 - Portland	19%	-57%	62%	29%	78%	71%	See “Mitigation Considerations” following the table.
41 - Joseph Ave	139%	-3%	81%	42%	83%	71%	Net service improvement. No mitigating efforts required.
42 - Parsells	-100%	-100%	50%	26%	74%	78%	See “Mitigation Considerations” following the table.
47 - Monroe	15%	-27%	24%	15%	63%	72%	Service reduction on route with below- average Minority and Low-Income populations does not trigger any equity concerns. No mitigating efforts required.
51 - S. Clinton	83%	-5%	34%	21%	79%	53%	See “Mitigation Considerations” following the table.
53 - S. Goodman	-100%	-100%	36%	22%	65%	57%	See “Mitigation Considerations” following the table.
57 - East Ave	-100%	-100%	25%	16%	58%	64%	Service reduction on route with below-average Minority population and below- average Minority ridership does not trigger any equity concerns. No mitigating efforts required.
81 - East Rochester - Fairport	-30%	-28%	22%	17%	55%	56%	Service reduction on route with below- average Minority population and below- average Minority and Low-Income ridership does not trigger any equity concerns. No mitigating efforts required.
82 - Penfield	-100%	-100%	25%	18%	26%	20%	Service reduction on route with below- average Minority population. Minority ridership does not trigger any equity concerns. No mitigating efforts required.
84 – Perinton/Eastview	-100%	-100%	22%	16%	49%	55%	Service reduction on route with below- average Minority population. Minority ridership does not trigger any equity concerns. No mitigating efforts required.

101 - Avon/Rush Park & Ride	-100%	-100%	34%	20%	44%	23%	Service reduction on route with below- average Minority and Low-Income ridership does not trigger any equity concerns. No mitigating efforts required.
102 - Newark/Lyons	-100%	-100%	24%	20%	34%	36%	Service reduction on route with below- average Minority population and below- average Minority and Low-Income ridership does not trigger any equity concerns. No mitigating efforts required.
103 - Webster	73%	-50%	39%	22%	70%	51%	See “Mitigation Considerations” following the table.
104 - Brockport	-100%	-100%	37%	23%	66%	59%	See “Mitigation Considerations” following the table.
106 - Hilton/Hamlin/Clarkson	-100%	-100%	35%	20%	9%	31%	Service reduction on route with below- average Minority and Low-Income ridership does not trigger any equity concerns. No mitigating efforts required.
124 - Marketplace ROC-it	-100%	-100%	48%	26%	79%	72%	See “Mitigation Considerations” following the table.
134 - Hudson ROC-it	-100%	-100%	71%	39%	77%	85%	See “Mitigation Considerations” following the table.
145 - South Ave ROC-it	-100%	-100%	41%	23%	78%	77%	See “Mitigation Considerations” following the table.
150 - Dewey ROC-it	-100%	-100%	53%	31%	68%	76%	See “Mitigation Considerations” following the table.
163 - Lyell ROC-it	-100%	-100%	54%	31%	53%	74%	See “Mitigation Considerations” following the table.

### Impact Assessment and Mitigation Considerations:

**Route 6:** The route along Jefferson Ave is the only route with minority ridership more than 20 percent above average where service will be reduced, however service will be provided by alternate routes. Route 6 was discontinued due to low ridership along large stretches of the route and at the airport, however, segments of the route with significant ridership were incorporated into other routes as part of the comprehensive consolidation and streamlining in this area. Ford St. will now be served by Route 19, and Jefferson Ave. and Brooks Ave. will now be served by Route 25. The remainder of the Route 6 service area is mostly within the quarter-mile walkshed of other proposed routes. (“Mostly” because the part of the route near the airport is a less dense area with few destinations and not well-suited to transit. Other portions of the route are within the proposed system walkshed.) *Thus, no mitigating actions are needed.*

**Route 13:** This route is being discontinued due to poor performance. The route's strength was the Edison High School stop, for which school service will continue to be provided. Additionally, though this route has more than 20 percent above average minority and low-income population, it does not support minority or low-income ridership more than 20 percent above average. *Thus, no mitigating actions are needed.*

**Route 15:** This route is being discontinued due to poor performance. Service is still provided to areas along this route through Route 1 and 10. Though this route has more than 20 percent above average low-income population, low-income ridership is not more than 20 percent above average. Furthermore, minority ridership is more than 20 percent below the average. *Thus, no mitigating actions are needed.*

**Route 16:** The area served by this route will be served by a Community Mobility Zone in lieu of fixed route service. Route 16 does not have strong enough performance to warrant the resources required to continue fixed route service. Additionally, though this route has more than 20 percent above average minority and low-income population, it does not have minority or low-income ridership more than 20 percent above average. *Thus, no mitigating actions are needed.*

**Route 19:** The 30 percent decrease in route miles for Route 19 was part of a comprehensive consolidation and streamlining of routes serving this area, thus alternative route options are available. Route 19 also serves the RTS Transit Center, which offers connections to several other routes. Additionally, though this route has more than 20 percent above average minority and low-income population, it does not support minority or low-income ridership more than 20 percent above average. *Thus, no mitigating actions are needed.*

**Route 23:** The Jefferson Rd. route was discontinued as part of the route rationalization process. Areas with substantial ridership along this route will be served by alternative routes, including Route 24 serving Marketplace Mall and Routes 11 (new Culver Rd Crosstown), 45, and 25 serving MCC. Though this route has above average minority and low-income population, it does not support minority or low-income ridership more than 20 percent above average. *Thus, no mitigating actions are needed.*

**Route 28:** Discontinuation of the Genesee Park/Strong route was part of a service rationalization process in this area. It provides a redundant network connection that overlapped with other, higher performing routes (ex: Route 8 – Chili). The service area of this route will either be directly served by another route or fall within an acceptable walk distance of service. Additionally, though this route has above average minority and low-income population, it does not support minority or low-income ridership more than 20 percent above average. *Thus, no mitigating actions are needed.*

**Route 33:** Alignment changes to the Goodman route decreased total route miles by 30 percent. To improve route performance and more strategically invest resources, the St. Ann's deviation and route segment north of Ridge Rd. were eliminated due to low ridership. Service to Irondequoit Plaza is still provided through alternative routes. Additionally, though this route has

above average minority and low-income population, it does not support minority or low-income ridership more than 20 percent above average. *Thus, no mitigating actions are needed.*

**Route 35:** The reduction of service hours and route miles for the St. Paul route is a result of route simplification. The route was simplified to one pattern and will terminate at Irondequoit Plaza. Areas north of Irondequoit Plaza were eliminated due to low ridership. Additionally, though this route has above average minority and low-income population, it does not support minority or low-income ridership more than 20 percent above average. *Thus, no mitigating actions are needed.*

**Route 36:** The Clifford route was consolidated with Route 103 as part of the rationalization and restructuring process. The area served by this alignment will be served by Route 103 and Route 11, the new Culver Rd Crosstown. Additionally, though this route has above average minority and low-income population, it does not support minority or low-income ridership more than 20 percent above average. *Thus, no mitigating actions are needed.*

**Route 39:** This route will be discontinued due to low ridership and productivity. Service alternatives will include Route 33 and Route 11, the new Culver Rd Crosstown. Additionally, though this route has above average minority and low-income population, it does not support minority or low-income ridership more than 20 percent above average. *Thus, no mitigating actions are needed.*

**Route 40 / Seabreeze Seasonal:** Route 40 has the second-highest ridership in the RTS system and was truncated to provide frequent service on the productive portion of the route and remove deviations/segments that were less productive: the St. Ann's deviation and route segment north of Ridge Rd. However, the Seabreeze Amusement Park will be served by a seasonal route between Memorial Day and Labor Day, running from the amusement park to the Ridge Rd. hub, where connections to several routes are available. *Thus, no further mitigating actions are needed.*

**Route 42:** Service will be discontinued on Route 42 due to poor performance. Current Parsells customers will be served by Route 103 and Route 11, the new Culver Rd Crosstown. Additionally, though this route has above average minority and low-income population, it does not support minority or low-income ridership more than 20 percent above average. *Thus, no mitigating actions are needed.*

**Route 51:** The S. Clinton route alignment has been simplified and service hours increased as part of the broader tier rationalization process. Low-income ridership of this route is more than 20 percent below average. Minority and low-income populations are within the 20 percent of average range. Service improvement to this route was not at the expense of reduction to routes with more than 20 percent above average low-income ridership and was necessary to create an effective network. *Thus, no mitigating actions are needed.*

**Route 53:** Discontinuation of the S. Goodman route was a result of low ridership and productivity. Though the geography of this route has a low-income concentration more than 20 percent above average, it's low-income ridership is more than 20 percent below average. In other words, even though there is a concentration of low-income people living near this route, they are not using it. The intent of the network plan is that route alternatives 51 and 11 will

better serve this area by connecting people to higher-demand destinations. *Thus, no mitigating actions are needed.*

**Route 103:** The alignment of the Webster route was simplified as part of a broader network simplification process and the service hours increased as part of the service tier rationalization process. The changes created a net service improvement. This route has above average low-income population but below average low-income ridership. Similar to Route 53, changes have been made to this route with the intent of better connecting the surrounding neighborhood with more direct service and improved frequency. This route is included here because it has below-average low-income ridership but is not considered a low-income route because it has above average low-income population. *Thus, no mitigating actions are needed.*

**Route 104:** The Brockport route was discontinued due to low ridership and productivity. Alternative service between the RTS Transit Center and Rochester Tech Park will be provided by Route 9 and Brockport will be served by a Community Mobility Zone. Additionally, though this route has above average low-income population, it does not support minority or low-income ridership more than 20 percent above average. *Thus, no mitigating actions are needed.*

**Routes 124, 134, 145, 150, and 163:** Part of Reimagine RTS was a service tier rationalization that resulted in the consolidation of ROC-it routes into frequent or local routes. So, though these routes are “discontinued,” the customers served by these routes will still be served by Routes 24, 34, 45, 10, and 3, respectively. *Thus, no mitigating actions are needed.*

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**In Summary,** Reimagine RTS is intended to focus investment into a well-connected network that effectively serves the region’s needs. To accomplish this goal, each route was analyzed and adjusted to maximize efficiency and provide the best service possible. Changes made to most routes were significant enough to constitute major service changes, requiring Title VI service equity analysis. The Title VI analysis finds that the proposed network does not create unequitable service through the service changes. Service reductions are distributed fairly across minority and/or low-income routes and non-minority and/or non-low-income routes. Route 6 (Jefferson Ave.) was the only route that qualified as creating a potential disparate impact. Reimagine RTS has incorporated service to that area through other routes in the proposed network in order to mitigate the impact. No further mitigation was required or recommended prior to adoption and implementation.

**It is worth noting** that a second analysis was completed by the RTS Business Analyst in January 2019 utilizing the same methodology with policies, survey data, poverty guidelines, and the 2017 ACS 5-year estimates. The second analysis did not reveal any additional routes that met the thresholds of minority or low-income population or ridership. As a result, RTS concluded that TMD’s findings remain valid when utilizing the most up to date data available.

Additional information regarding Reimagine RTS and Title VI is also referenced in the RGRTA Title VI Program Plan 2020-2023.

**Additional notes** since the previous Major Service Change and Title VI Evaluation Memo:

As a direct result of Reimagine RTS, a total of 916 bus stops were removed from route segments that were discontinued and a total of 110 bus stops were added for new route sections.

Bus stops that were discontinued for the May 2021 - Reimagine RTS scheduling period are listed in the document titled “Bus Stops to be Removed and Added for Reimagine RTS (May 2021)”, which is provided as an addendum to this memo.

As a direct result of Reimagine RTS, a total of 24 shelters were removed from route segments that were discontinued and 2 shelters were installed to service new multiple connecting routes.

The following list is for bus shelters that were installed and removed for the May 2021 – Reimagine RTS scheduling period:

Installed	
Route(s)	Bus Shelter Location
5,6,40,41,70	Skyview Connection Hub (2)

Removed	
Route(s)	Bus Shelter Location
51, 53	Monroe Developmental Center
10, 15	Dewey & Latta
10, 15	Affinity Orchard Place
24	Park Point North
35	Summerville Loop
40	Culver & E. Ridge
33	Kings Hwy & Bishop Kearney
31, 57	St John Fisher Lot M
1	411 Beach @ The Shore Winds
34	Carter @ Wilson Health Ctr
38	Farmington & Winton
6, 28	Genesee Park & Brooks



28	West & Hancock
35	St Paul & Thomas
33	Kings Hwy & Parker
39, 42	Bay & Culver (@ Rite Aid)
19	Fitzhugh Pl & Fitzhugh
48	Humboldt & Brookfield
48	Humboldt & 104 Humboldt (near Culver)
81, 82, 84, 101, 102, 103	Hall of Justice
23, 24, 50	Crittenden & E Squire (Rustic Village)
13	Emerson & Mt Read
45	Norfolk & Lattimore
84	Bushnell's Basin Park & Ride



## MEMORANDUM

To: Dan DeLaus  
From: Dan Kenyon  
Cc: Miguel Velazquez, Lea Goodness, Julie Boasi, Sara Molyneux  
Date: 9-1-2021  
Re: Major Service Change and Title VI Evaluation, **September 2021** Scheduling Period

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This memo lists any service changes implemented by RTS for the September 2021 scheduling period and identifies any changes requiring Title VI analysis. These service changes go into effect on September 6, 2021.

The decision for any Title VI evaluation is based on guidelines provided in the “3.0 Major Service Change Policy” section of *TITLE VI PROGRAM POLICIES FOR SERVICE CHANGES & SERVICE MONITORING ON RTS FIXED ROUTES* (approved by the RGRTA Board in September 2020). All Major Service Changes and fare changes to RTS fixed routes are subject to a Title VI Equity Analysis prior to approval by the RGRTA Board of Commissioners.

### Major Service Change

A major service change either:

- Changes the number of service hours operated on any RTS fixed route by 25% or more; or
- Changes the length of the route structure by 25% or more. Route structure refers to the section out of a route based on map coverage rather than based on vehicle miles.

### Exceptions

The following are not considered major service changes:

- Subsidized route extension (business partner)
- Experimental route
- Express transfer service
- Minor route change
- Minor timing change

All of the service changes were reviewed. The tables below (pages 2-3) contain a determination as to whether the change constituted a major service change according to these Title VI guidelines. An impact assessment summary is provided for all major service changes on page 4.

## Service Changes Reviewed for September 2021

Route(s)	Potential Action	Exceptions?	25%+ Change in Hours?	25% Change in Length	Major Service Change?
<b>1</b> <b>St Paul</b>	Added 1 weekday trip	Minor route & timing change	N/A	N/A	No
<b>2</b> <b>North Clinton</b>	Added 1 weekday / weekend trip	Minor route & timing change	N/A	N/A	No
<b>3</b> <b>Joseph</b>	Added 1 weekend trip	Minor route & timing change	N/A	N/A	No
<b>4</b> <b>Hudson</b>	Added 1 weekend trip & trip time adjustment	Minor route & timing change	N/A	N/A	No
<b>5</b> <b>Portland</b>	Added 1 weekend trip & trip time adjustment	Minor route & timing change	N/A	N/A	No
<b>6</b> <b>North Goodman</b>	Added 1 weekday trip & weekend trip time adjustments	Minor route & timing change	N/A	N/A	No
<b>7</b> <b>Clifford / Empire</b>	Added 1 weekend trip	Minor route & timing change	N/A	N/A	No
<b>8</b> <b>East Main</b>	Added 1 weekday / weekend trip & trip time adjustment	Minor route & timing change	N/A	N/A	No
<b>9</b> <b>University</b>	Timing changes	Minor route & timing change	N/A	N/A	No
<b>10</b> <b>Park</b>	Added & removed 1 weekend trip & weekday timing adjustments	Minor route & timing change	N/A	N/A	No
<b>11</b> <b>Monroe</b>	Added 1 weekend trip & shifted last trip from short line to long line	Minor route & timing change	N/A	N/A	No
<b>13</b> <b>South Avenue</b>	Departure timing changes for weekdays and weekends. Removed 1 weekend trip	Minor route & timing change	N/A	N/A	No
<b>14</b> <b>Marketplace</b>	Departure timing changes for weekdays and weekends	Minor route & timing change	N/A	N/A	No
<b>15</b> <b>Plymouth</b>	Added 1 weekend trip & timing changes	Minor route & timing change	N/A	N/A	No
<b>16</b> <b>Genesee</b>	Added 1 weekend trip	Minor route & timing change	N/A	N/A	No
<b>17</b> <b>Jefferson / 19<sup>th</sup> Ward</b>	Time shifts due to rerouting around Brooks, Thurston, Arnett and Genesee	Minor route & timing change	N/A	N/A	No
<b>18</b> <b>Chili</b>	Removed the short line, 18 Chili is now a local route. Removed Jet View Drive due to low ridership. Shifted all IB trips. Added 1 weekend trip	N/A	Yes (-42%)	No	Yes

Route(s)	Potential Action	Exceptions?	25%+ Change in Hours?	25% Change in Length	Major Service Change?
<b>19 Buffalo Road</b>	Added 1 weekday / weekend trip	Minor route & timing change	N/A	N/A	No
<b>20 Lyell</b>	Added 1 weekday / weekend trip	Minor route & timing change	N/A	N/A	No
<b>21 Dewey</b>	Re-routed to Eastman Hub. Timing shifts/changes. Added 1 weekend trip	Minor route & timing change	N/A	N/A	No
<b>22 Lake</b>	Added 1 weekday / weekend trip. Time shifting for late night trips	Minor route & timing change	N/A	N/A	No
<b>23 West Ave. / Airport</b>	<b>Added New Route</b>	N/A	Yes +100%	Yes +100%	Yes
<b>40 Ridge Crosstown</b>	Weekend timing shifts / changes	Minor route & timing change	N/A	N/A	No
<b>41 Culver / Goodman Crosstown</b>	Weekend timing shifts / changes	Minor route & timing change	N/A	N/A	No
<b>42 Lyell/Upper Falls Crosstown</b>	Timing shifts / changes	Minor route & timing change	N/A	N/A	No
<b>50 Fairport / Penfield</b>	Re-routed, added/removed stops on Blossom, Landing, Winton and East. Timing shifts / changes	Minor route & timing change	N/A	N/A	No
<b>70 Seabreeze Seasonal</b>	Seasonal route ends on Sept. 30 <sup>th</sup> .	N/A	N/A	N/A	No
<b>71 Public Market Special</b>	<b>Added New Route</b>	N/A	Yes +100%	Yes +100%	Yes
<b>74 Tiger East End Express</b>	Start seasonal route (Friday/Saturday only)	Business Partner	N/A	N/A	No
<b>90 Avon / Rush Commuter</b>	Timing shifts / changes	Minor route & timing change	N/A	N/A	No
<b>91 Newark / Lyons Commuter</b>	Timing shifts / changes	Minor route & timing change	N/A	N/A	No
<b>93 Webster Commuter</b>	<b>Discontinued Route</b>	N/A	Yes -100%	Yes -100%	Yes
<b>94 Brockport Commuter</b>	<b>Discontinued Route</b>	N/A	Yes -100%	Yes -100%	Yes
<b>95 Eastview Commuter</b>	<b>Discontinued Route</b>	N/A	Yes -100%	Yes -100%	Yes
<b>97 Elmwood Commuter</b>	Added 1 weekday trip	Minor route & timing change	N/A	N/A	No
<b>98 Lexington Commuter</b>	<b>Added New Route</b>	N/A	Yes +100%	Yes +100%	Yes

### Impact Assessment Summary for RTS Routes with Major Service Changes

Route Name	Percent Change in Revenue Hours	Percent Change in Route Miles	Impact Assessment Summary
<b>18 Chili</b>	-42%	-19%	Change in revenue hours is primarily due to removal of the Chili Short Line. Service on Jet View Drive was discontinued due to low or no ridership. New Route 23 provides additional service options along West Main and to Chili Walmart. No mitigating actions necessary.
<b>23 West Ave. / Airport</b>	+100%	+100%	New Route. Service Improvement. No mitigating actions necessary.
<b>71 Public Market Special</b>	+100%	+100%	New Route. Service Improvement. No mitigating actions necessary.
<b>93 Webster Commuter</b>	-100%	-100%	Route discontinued due to poor performance. The area will still be served by an On Demand Zone in lieu of fixed route service. No mitigating actions necessary.
<b>94 Brockport Commuter</b>	-100%	-100%	Route discontinued due to poor performance. The area will still be served by an On Demand Zone in lieu of fixed route service. No mitigating actions necessary.
<b>95 Eastview Commuter</b>	-100%	-100%	Route discontinued due to poor performance. The area will still be served by an On Demand Zone in lieu of fixed route service. No mitigating actions necessary.
<b>98 Lexington Commuter</b>	+100%	+100%	New Route. Service Improvement. No mitigating actions necessary.

Additional notes since the previous Major Service Change and Title VI Evaluation Memo:

The following bus stops were added or removed from service for the September 2021 scheduling period:

Installed / Added	
Route	Bus Stop Location
N/A	NONE

Removed			
Route	Bus Stop Location	Route	Bus Stop Location
18	Wegmans Market & Chili	94	6460 Brockport-Spencerport
18	Wegmans Market & Jetview	94	Brockport-Spencerport & Walmart
18	Jetview & 49 Jetview	94	Brockport-Spencerport & Owens
18	Jetview & Paul	94	5747 Brockport-Spencerport
18	Paul & Ironstone	94	Brockport-Spencerport & Sweden Walker
18	Marshall & 884 Marshall	94	5370 Brockport-Spencerport
18	Marshall & Sunderland	94	Brockport-Spencerport & Salmon Creek
18	Marshall & Chili	94	Brockport-Spencerport & Hubbell
18	Marshall & Chili	93	Empire & 1998 Empire
18	Marshall opp Waltham	93	Empire & Empire Park
18	Marshall & opp Sunderland	93	Empire & Gravel
18	Marshall & Paul	93	Ridge & 664 Ridge
18	Paul & Trade	93	Ridge & 755 Ridge
18	Jetview & 2 Jetview	93	Ridge & Five Mile Line
18	Jetview & 50 Jetview	93	Ridge & Webster High Sch
18	Jetview & Wegmans Market	93	Ridge & Webster Square
18	Wegmans Market & Chili	93	Ridge & Shoecraft
50	East & Winton	93	Ridge & Webster Commons
50	East & Grosvenor	93	Ridge & Jackson
50	East & Pelham	93	Ridge & 173 Ridge
50	East & Clover	93	Ridge & Corning Park
50	Penfield & East	93	Ridge & South
50	East & 2430 East	93	Ridge & Curtice Park
50	East & Pelham	93	Ridge & Phillips
50	East & 2157 East	93	Krieger & 101-170 Krieger
50	East & Winton	93	Krieger & 201-222 Krieger
94	Elmgrove & 880 Elmgrove	93	Krieger & 601-629 Krieger
94	Brockport-Spencerport & Hubbell	93	Krieger & 801-829 Krieger
94	Brockport-Spencerport & Salmon Creek	93	Krieger & 1001-1019 Krieger



94	5370 Brockport-Spencerport	93	Ridge & Baker
94	Brockport-Spencerport & Sweden Walker	93	Ridge & Dunning
94	5747 Brockport-Spencerport	93	Ridge & North
94	Brockport-Spencerport & Owens	93	Ridge & Corning Park
94	Brockport-Spencerport & Transit	93	Ridge & Sherwood
94	Brockport-Spencerport & Lake Rd	93	Ridge & Rachel
94	Lake & Crestview Brockport	93	Ridge & Webster Rural Cemetery
94	Lake & Sweden Ln Brockport	93	Ridge & Webster Commons
94	Main & Hillcrest Brockport	93	Ridge & Shoecraft
94	Main & Fair Brockport	93	Webster Square & Blossoms
94	Monroe & Main Brockport	93	Ridge & Aldi's & CVS
94	Monroe & Kenyon Brockport	93	Ridge & Five Mile Line
94	Holley & 180 Holley	93	Ridge & 768 Ridge
94	Holley & Commencement	93	Ridge & 671 Ridge
94	Commencement & Brockport HS	93	Empire & 2180 Empire
94	Brockport Park & Ride	93	Empire & Webster Manor
94	Commencement & Brockport HS	93	Empire & Midland
94	Holley & Commencement	95	Pittsford Victor & Woodcliff
94	Holley & 180 Holley	95	Pittsford Victor & Mosley
94	Monroe & Kenyon Brockport	95	Route 96 & Eastview Commons Ent
94	Monroe & Utica Brockport	95	Eastview Mall Entrance 3
94	Monroe & Main Brockport	95	Eastview Park & Ride
94	Main & Adams - Brockport	95	Pittsford Victor & opp Commons
94	Main & Centennial - Brockport	95	Pittsford Victor & Moseley
94	Lake & Ellis - Brockport	95	Pittsford Victor & Woodcliff
94	Lake & Wegmans Brockport		

The following bus shelters were installed or removed from service for the September 2021 scheduling period:

Installed	
Route(s)	Bus Shelter Location
N/A	NONE

Removed	
Route(s)	Bus Shelter Location
N/A	NONE



## MEMORANDUM

To: Dan DeLaus  
From: Dan Kenyon  
Cc: Miguel Velazquez, Lea Goodness, Julie Boasi, Sara Molyneux  
Date: 9-7-2021  
Re: Major Service Change and Title VI Evaluation, **Emergency September 2021** Scheduling Period

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This memo lists any service changes implemented by RTS for the Emergency September 2021 scheduling period and identifies any changes requiring Title VI analysis. The memo is in addition to the regular September 2021 scheduling period. These service changes go into effect on September 13, 2021.

The decision for any Title VI evaluation is based on guidelines provided in the “3.0 Major Service Change Policy” section of *TITLE VI PROGRAM POLICIES FOR SERVICE CHANGES & SERVICE MONITORING ON RTS FIXED ROUTES* (approved by the RGRTA Board in September 2020). All Major Service Changes and fare changes to RTS fixed routes are subject to a Title VI Equity Analysis prior to approval by the RGRTA Board of Commissioners.

### Major Service Change

A major service change either:

- Changes the number of service hours operated on any RTS fixed route by 25% or more; or
- Changes the length of the route structure by 25% or more. Route structure refers to the section out of a route based on map coverage rather than based on vehicle miles.

### Exceptions

The following are not considered major service changes:

- Subsidized route extension (business partner)
- Experimental route
- Express transfer service
- Minor route change
- Minor timing change

All the service changes were reviewed. Table 1 below contains a determination as to whether the change constituted a major service change according to these Title VI guidelines. An impact assessment summary is provided for all major service changes in Table 2.

**Table 1: Service Changes Reviewed for Emergency September 2021**

Route(s)	Potential Action	Exceptions?	25%+ Change in Hours?	25% Change in Length	Major Service Change?
<b>3 Joseph</b>	Increased headway from 15' to 30' from 6am to 6pm	None	Yes (-40%)	N/A	Yes
<b>4 Hudson</b>	Increased headway from 15' to 30' from 6am to 6pm	None	Yes (-40%)	N/A	Yes
<b>5 Portland</b>	Increased headway from 15' to 30' from 6am to 6pm	None	Yes (-38%)	N/A	Yes
<b>8 East Main</b>	Increased headway from 15' to 30' from 6am to 6pm	None	Yes (-40%)	N/A	Yes
<b>11 Monroe</b>	Increased headway from 15' to 30' from 6am to 6pm	None	No (-14%)	N/A	No
<b>16 Genesee</b>	Increased headway from 15' to 30' from 6am to 6pm	None	Yes (-40%)	N/A	Yes
<b>22 Lake</b>	Increased headway from 15' to 30' from 6am to 6pm	None	Yes (-27%)	N/A	Yes

**Table 2: Impact Assessment Summary for RTS Routes with Major Service Changes**

Route(s)	Percent Change in Revenue Hours	Percent Change in Route Miles	Impact Assessment Summary
<b>3 - Joseph</b>	-40%	N/A	Change in revenue hours is due to discontinuing 15-minute service and implementing 30-minute headway. No change or reduction in routing. FTA agrees this change is considered temporary and is due to the COVID crisis. No mitigation is necessary.
<b>4 - Hudson</b>	-40%	N/A	Change in revenue hours is due to discontinuing 15-minute service and implementing 30-minute headway. No change or reduction in routing. FTA agrees this change is considered temporary and is due to the COVID crisis. No mitigation is necessary.
<b>5 - Portland</b>	-38%	N/A	Change in revenue hours is due to discontinuing 15-minute service and implementing 30-minute headway. No change or reduction in routing. FTA agrees this change is considered temporary and is due to the COVID crisis. No mitigation is necessary.
<b>8 - East Main</b>	-40%	N/A	Change in revenue hours is due to discontinuing 15-minute service and implementing 30-minute headway. No change or reduction in routing. FTA agrees this change is considered temporary and is due to the COVID crisis. No mitigation is necessary.

<b>16 - Genesee</b>	<b>-40%</b>	N/A	Change in revenue hours is due to discontinuing 15-minute service and implementing 30-minute headway. No change or reduction in routing. FTA agrees this change is considered temporary and is due to the COVID crisis. No mitigation is necessary.
<b>22 - Lake</b>	<b>-27%</b>	N/A	Change in revenue hours is due to discontinuing 15-minute service and implementing 30-minute headway. Minor change in routing as Short Line segment was removed. FTA agrees this change is considered temporary and is due to the COVID crisis. No mitigation is necessary.

Additional notes since the previous Major Service Change and Title VI Evaluation Memo:

1. The following **bus stops** were installed and/or removed from service for the Emergency September 2021 scheduling period:

Installed	
Route(s)	Bus Stop Location
N/A	NONE

Removed	
Route(s)	Bus Stop Location
N/A	NONE

2. The following **bus shelters** were installed and/or removed from service for the Emergency September 2021 scheduling period:

Installed	
Route(s)	Bus Shelter Location
N/A	NONE

Removed	
Route(s)	Bus Shelter Location
N/A	NONE



## MEMORANDUM

To: Dan DeLaus  
From: Dan Kenyon  
Cc: Miguel Velazquez, Lea Goodness, Julie Boasi, Sara Molyneux  
Date: 3-25-20  
Re: Major Service Change and Title VI Evaluation, **April 2020** Scheduling Period

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This memo lists any service changes implemented by RTS for the April 2020 scheduling period and identifies any changes requiring Title VI analysis. These service changes go into effect on April 6, 2020.

The decision for any Title VI evaluation is based on guidelines provided in the “3.0 Major Service Change Policy” section of *TITLE VI PROGRAM POLICIES FOR SERVICE CHANGES & SERVICE MONITORING ON RTS FIXED ROUTES* (adopted by the RGRTA Board in May 2017). All Major Service Changes and fare changes to RTS fixed routes are subject to a Title VI Equity Analysis prior to approval by the RGRTA Board of Commissioners.

### Major Service Change

A major service change either:

- Changes the number of service hours operated on any RTS fixed route by 25% or more; or
- Changes the length of the route structure by 25% or more. Route structure refers to the section out of a route based on map coverage rather than based on vehicle miles.

### Exceptions

The following are not considered major service changes:

- Subsidized route extension (business partner)
- Experimental route
- Express transfer service
- Minor route change
- Minor timing change

All of the service changes were reviewed. The table below contains a determination as to whether the change constituted a major service change according to these Title VI guidelines.

## Service Changes Reviewed for April 2020

Route	Potential Action	Exceptions?	25%+ Change in Hours?	25% Change in Length	Major Service Change?
All Routes	No Minor or Major Service Changes	N/A	N/A	N/A	N/A

Additional notes since the previous Major Service Change and Title VI Evaluation Memo:

- The following bus stops were physically installed/removed for the April 2020 scheduling period:

Installed / Added	
Route	Bus Stop Location
74	RIT S Lot
74	RIT Crossroads

Removed	
Route	Bus Stop Location
74	Andrews & Tyler

- The following bus shelters were physically installed/removed for the April 2020 scheduling period:

Installed	
Routes	Bus Shelter Location
	NONE

Removed	
Route	Bus Shelter Location
	NONE





## MEMORANDUM

To: Dan DeLaus  
From: Dan Kenyon  
Cc: Miguel Velazquez, Lea Goodness, Julie Boasi, Sara Molyneux  
Date: 6-27-20  
Re: Major Service Change and Title VI Evaluation, **June 2020** Scheduling Period

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This memo lists any service changes implemented by RTS for the June 2020 scheduling period and identifies any changes requiring Title VI analysis. These service changes go into effect on June 29, 2020.

The decision for any Title VI evaluation is based on guidelines provided in the “3.0 Major Service Change Policy” section of *TITLE VI PROGRAM POLICIES FOR SERVICE CHANGES & SERVICE MONITORING ON RTS FIXED ROUTES* (adopted by the RGRTA Board in May 2017). All Major Service Changes and fare changes to RTS fixed routes are subject to a Title VI Equity Analysis prior to approval by the RGRTA Board of Commissioners.

### Major Service Change

A major service change either:

- Changes the number of service hours operated on any RTS fixed route by 25% or more; or
- Changes the length of the route structure by 25% or more. Route structure refers to the section out of a route based on map coverage rather than based on vehicle miles.

### Exceptions

The following are not considered major service changes:

- Subsidized route extension (business partner)
- Experimental route
- Express transfer service
- Minor route change
- Minor timing change

All of the service changes were reviewed. The table below contains a determination as to whether the change constituted a major service change according to these Title VI guidelines.

## Service Changes Reviewed for June 2020

Route	Potential Action	Exceptions?	25%+ Change in Hours?	25% Change in Length	Major Service Change?
All Routes	No Minor or Major Service Changes	N/A	N/A	N/A	N/A

Additional notes since the previous Major Service Change and Title VI Evaluation Memo:

- The following bus stops were physically installed/removed for the **June 2020** scheduling period:

Installed / Added	
Route	Bus Stop Location
	NONE

Removed	
Route	Bus Stop Location
	NONE

- The following bus shelters were physically installed/removed for the **June 2020** scheduling period:

Installed	
Routes	Bus Shelter Location
	NONE

Removed	
Route	Bus Shelter Location
	NONE



## MEMORANDUM

To: Dan DeLaus  
From: Dan Kenyon  
Cc: Miguel Velazquez, Lea Goodness, Julie Boasi, Sara Molyneux  
Date: 8-31-20  
Re: Major Service Change and Title VI Evaluation, **September 2020** Scheduling Period

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This memo lists any service changes implemented by RTS for the September 2020 scheduling period and identifies any changes requiring Title VI analysis. These service changes go into effect on September 7, 2020.

The decision for any Title VI evaluation is based on guidelines provided in the “3.0 Major Service Change Policy” section of *TITLE VI PROGRAM POLICIES FOR SERVICE CHANGES & SERVICE MONITORING ON RTS FIXED ROUTES* (adopted by the RGRTA Board in May 2017). All Major Service Changes and fare changes to RTS fixed routes are subject to a Title VI Equity Analysis prior to approval by the RGRTA Board of Commissioners.

### Major Service Change

A major service change either:

- Changes the number of service hours operated on any RTS fixed route by 25% or more; or
- Changes the length of the route structure by 25% or more. Route structure refers to the section out of a route based on map coverage rather than based on vehicle miles.

### Exceptions

The following are not considered major service changes:

- Subsidized route extension (business partner)
- Experimental route
- Express transfer service
- Minor route change
- Minor timing change

All of the service changes were reviewed. The table below contains a determination as to whether the change constituted a major service change according to these Title VI guidelines.

## Service Changes Reviewed for September 2020

Route(s)	Potential Action	Exceptions?	25%+ Change in Hours?	25% Change in Length	Major Service Change?
1	Trip time adjustment	Minor timing change	N/A	N/A	No
3	Removed service to: <u>Greece Community Education (Alcott Rd.)</u> <u>Hildebrandt Hospice</u>	Business Partners	N/A	N/A	No
5	Route discontinued to: <u>Monroe Community College (MCC)</u>	Business Partner	N/A	N/A	No
8	Removed weekday service to: <u>QCI Direct (Home Trends)</u>	Business Partner	N/A	N/A	No
23	Removed weekday service to: <u>Lifetime Care</u>	Business Partner	N/A	N/A	No
24	Trip time adjustment	Minor timing change	N/A	N/A	No
33	Added back pull-in trips to: Bishop Kearney HS	Minor route & timing change	N/A	N/A	No
35	Added back trip to: Cooper Loop	Minor route & timing change	N/A	N/A	No
37	Added back trips to: Cooper Loop & Fieldhouse	Minor route & timing change	N/A	N/A	No
38	Added back pull-in trips to: Mercy HS	Minor route & timing change	N/A	N/A	No
40	Added back pull-in trips to: Bishop Kearney HS	Minor route & timing change	N/A	N/A	No
42	Removed service to: <u>Hill Haven</u>	Business Partner	N/A	N/A	No
47	Added back trips to: Pittsford Mendon HS and Pittsford Sutherland HS	Minor route & timing change	N/A	N/A	No
59	Route discontinued to: <u>Monroe Community College (MCC)</u>	Business Partner	N/A	N/A	No
81	Removed weekday service to: <u>Monroe BOCES (Fairport)</u>	Business Partner	N/A	N/A	No
650 thru 657 (8 Routes Total)	Added back trips to: <u>Vertus Charter School</u>	Business Partner	N/A	N/A	No

Additional notes since the previous Major Service Change and Title VI Evaluation Memo:

1. The following bus stops were physically installed/removed for the September 2020 scheduling period:

Installed / Added	
Route	Bus Stop Location
	NONE

Removed	
Route	Bus Stop Location
	NONE

2. The following bus shelters were physically installed/removed for the September 2020 scheduling period:

Installed	
Route(s)	Bus Shelter Location
1	Beach & Estes
40	Portland & Clifford
37	N Clinton & Central
10	Dewey & De Neve
31,38,48,81,82	Blossom Loop
9	Rochester Tech Park Bldg. 1

Removed	
Route	Bus Shelter Location
	NONE



## MEMORANDUM

To: Dan DeLaus  
From: Dan Kenyon  
Cc: Miguel Velazquez, Lea Goodness, Julie Boasi, Sara Molyneux  
Date: 11-23-2020  
Re: Major Service Change and Title VI Evaluation, **Emergency December 2020** Scheduling Period

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This memo lists any service changes implemented by RTS for the Emergency December 2020 scheduling period and identifies any changes requiring Title VI analysis. These service changes go into effect on November 30, 2020. As a note, the Emergency December 2020 scheduling period is in lieu of a January 2021 scheduling period.

The decision for any Title VI evaluation is based on guidelines provided in the “3.0 Major Service Change Policy” section of *TITLE VI PROGRAM POLICIES FOR SERVICE CHANGES & SERVICE MONITORING ON RTS FIXED ROUTES* (adopted by the RGRTA Board in May 2017). All Major Service Changes and fare changes to RTS fixed routes are subject to a Title VI Equity Analysis prior to approval by the RGRTA Board of Commissioners.

### Major Service Change

A major service change either:

- Changes the number of service hours operated on any RTS fixed route by 25% or more; or
- Changes the length of the route structure by 25% or more. Route structure refers to the section out of a route based on map coverage rather than based on vehicle miles.

### Exceptions

The following are not considered major service changes:

- Subsidized route extension (business partner)
- Experimental route
- Express transfer service
- Minor route change
- Minor timing change

All of the service changes were reviewed. The table below contains a determination as to whether the change constituted a major service change according to these Title VI guidelines.



## Service Changes Reviewed for (Emergency) December 2020

Route(s)	Potential Action	Exceptions?	25%+ Change in Hours?	25% Change in Length	Major Service Change?
9	Removed service to: <u>Open Door Mission</u>	Business Partner	N/A	N/A	No

Additional notes since the previous Major Service Change and Title VI Evaluation Memo:

- The following bus stops were physically installed/removed for the Emergency December 2020 scheduling period:

Installed / Added	
Route	Bus Stop Location
	NONE

Removed	
Route	Bus Stop Location
9	Coldwater and opp. 250 Coldwater

- The following bus shelters were physically installed/removed for the Emergency December 2020 scheduling period:

Installed	
Route(s)	Bus Shelter Location
14 & 40	Portland & Buell

Removed	
Route(s)	Bus Shelter Location
14 & 40	Portland & St Ann's
47 & 103	Court & Chestnut
1	Lake & Boxart

*Major Service Change and Title VI Evaluation – January, 2020 Scheduling Period*

## MEMORANDUM

To: Dan DeLaus  
From: Dan Kenyon  
Cc: Miguel Velazquez, Lea Goodness, Julie Boasi, Sara Molyneux  
Date: 12-17-19  
Re: Major Service Change and Title VI Evaluation, **January 2020** Scheduling Period

---

This memo lists any service changes implemented by RTS for the January 2020 scheduling period and identifies any changes requiring Title VI analysis. These service changes go into effect on January 6, 2020.

The decision for any Title VI evaluation is based on guidelines provided in the “3.0 Major Service Change Policy” section of *TITLE VI PROGRAM POLICIES FOR SERVICE CHANGES & SERVICE MONITORING ON RTS FIXED ROUTES* (adopted by the RGRTA Board in May 2017). All Major Service Changes and fare changes to RTS fixed routes are subject to a Title VI Equity Analysis prior to approval by the RGRTA Board of Commissioners.

### Major Service Change

A major service change either:

- Changes the number of service hours operated on any RTS fixed route by 25% or more; or
- Changes the length of the route structure by 25% or more. Route structure refers to the section out of a route based on map coverage rather than based on vehicle miles.

### Exceptions

The following are not considered major service changes:

- Subsidized route extension (business partner)
- Experimental route
- Express transfer service
- Minor route change
- Minor timing change

All of the service changes were reviewed. The table below contains a determination as to whether the change constituted a major service change according to these Title VI guidelines.

## Major Service Change and Title VI Evaluation – January, 2020 Scheduling Period

## Service Changes Reviewed for January 2020

Route	Potential Action	Exceptions?	25%+ Change in Hours?	25% Change in Length	Major Service Change?
23 Jefferson Rd	Time changes on trips.	Minor timing change	N/A	N/A	No
24 Marketplace	Time changes on trips.	Minor timing change	N/A	N/A	No
37 North Clinton	Time changes on trips.	Minor timing change	N/A	N/A	No
47 Monroe	Time changes on trips.	Minor timing change	N/A	N/A	No
81 Fairport	Time changes on trips.	Minor timing change	N/A	N/A	No
82 Penfield	Time changes on trips.	Minor timing change	N/A	N/A	No
150 Dewey ROC-it	Time changes on trips.	Minor timing change	N/A	N/A	No

Additional notes since the last quarterly report:

- The following bus stops were physically installed/removed for the January 2020 scheduling period:

Installed	
Route	Bus Stop Location
83	VA – Calkins Rd.

Removed	
Route	Bus Stop Location
	NONE

- The following bus shelters were physically installed/removed for the January 2020 scheduling period:

Installed	
Routes	Bus Shelter Location
10 & 15 & 150	Dewey and Maiden
Removed	
Route	Bus Shelter Location
	NONE