

# Title VI Equity Analysis

StarTran Bus, Operations & Maintenance Relocation  
Site Selection

January 26, 2018



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## Background and Project Description

StarTran is a Division of the City of Lincoln, Nebraska that provides fixed-route bus and paratransit service within the 90 square mile city limits. The Lincoln Urbanized Area had a population of 258,379 people (2010 Census), which has grown to 272,996 in 2014 (Census 2014 est.). Lincoln is the State capital and home to the University of Nebraska. StarTran operates a fleet of 67 full-size coaches and 13 paratransit vans on 20 fixed routes, with ridership of 10,600 daily riders (2.36 million passenger trips in 2015). StarTran bus service operates weekdays (Monday through Friday), from 6 a.m. to 9 p.m. and on Saturdays from 6 a.m. to 7 p.m.

StarTran Administrative Offices, Bus Maintenance and Bus Garage are all located at 710 J Street. A 27,499 square foot storage garage is located at 7th & G Street. All 67 full sized buses and 13 paratransit vans including staff vehicles are housed at 710 J Street.

- Current facility was constructed in 1930 with additions built in 1990 and a bus maintenance expansion and garage built in 2010.
- Total square feet of current facility is approximately 200,000.
- In 2015 StarTran purchased 13 Compressed Natural Buses. Fueling for these buses is off site approximately 10 miles from bus garage.
- In 2016 StarTran applied for \$16,294,395 through FTA Bus and Bus Facilities Grant Program for design and construction of a Bus Maintenance and Storage facility.
- In 2016 StarTran applied for \$900,000 to construct a Renewable Fueling Gas station to be installed near the Lincoln Water and Wastewater System's Theresa Street treatment system.
- The West Haymarket commercial/residential development area which is less than a mile from StarTran's Bus Facility has been growing. New commercial and residential sites have developed within close proximity to StarTran.
- The 2015 Haymarket concept plan includes the site where StarTran currently is located as a potential commercial or residential site.

In April 2017 a feasibility study was initiated to:

1. Identify current and future bus maintenance, operations, and administrative facility needs
2. Identifies three (4) potential sites that meet the projected needs. (Note that StarTran has initially suggested that sites should be in Lincoln, Nebraska within boundaries of O Street to Cornhusker and 17th Street to 33rd Street.)
3. Considers how to integrate the new facility with the future production of biogas treatment and storage system from the City of Lincoln Waste Water Treatment Plant at 2400 Teresa Street.
4. Recommend a preferred site for acquisition by StarTran, based on prioritized site selection criteria.

### **Study Purpose**

Relocating to a new site will involve the acquisition of property. The purpose of this Title VI Equity Analysis is to analyze the top 4 preferred sites for a new StarTran Bus, Operations, and Maintenance Facility to ensure the locations were selected without regard to race, color, or national origin. This study also compares the equity impacts of the four sites:

1. 3301 West O Street – site is vacant and has no residents or businesses located on property. Site is next to Lancaster County Jail.
2. Portion of Waste Water Treatment Plant (2400 Theresa Street) - site is vacant and has no residents or businesses located on property.
3. 545 West O Street – Site has industrial buildings but no residents. The site was a former steel fabrication plant.
4. 1001 Sun Valley Boulevard – site has one abandoned housing structure and no businesses or residents on property.

Per FTA C 4702.1B, Title VI equity analyses for the location of facilities must occur in the planning stage before a preferred site has been selected. Sites have been evaluated and ranked as part of the StarTran Facility Relocation Feasibility Study process and the StarTran Advisory Board has been notified of top sites at an Advisory Board meeting on August 17, 2017.

## **Title VI Compliance**

StarTran is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B.

Title 49 CFR Section 21.9(b)(3) states, “In determining the site of location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part.” Title 9 CFR part 21, Appendix C, Section (3)(iv) provides, “The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin.”

StarTran is required to conduct a Title VI equity analysis to ensure the location is selected without regard to race, color, or national origin. Per guidance in the circular, this analysis must:

- Include outreach to persons potentially impacted by the siting of the facility;
- Compare impacts of various siting alternatives;
- Determine if cumulative adverse impacts might result due to the presence of other facilities with similar impacts in the area; and
- Occur before the selection of the preferred site.

If disparate impacts are identified, the least discriminatory alternative must be implemented.

## **Site Selection Process**

The site selection process started with identifying the space needs based on the fleet projections. Based on feedback from StarTran staff the site selection criteria were used to identify and evaluate potential sites for a new Administration, Operations, Maintenance, and Storage Facility that accommodates StarTran’s current and future needs (through 2050).

Site selection criteria were listed in the following categories.

- General Geographic Area
- Site Size and Configuration
- Cost
- Access Requirements
- General Site Requirements
- Existing Structure Remodeling Criteria

The site selection process started with identifying the space needs based on the fleet projections. Site selection criteria were then developed and provided to NAIFMA Realty, a local real estate firm, to identify candidate sites.

Thirteen sites were identified and an initial screening reduced the number of sites to seven sites, which were visited to observe existing conditions. During that process, six were eliminated from further

consideration and four additional sites were identified, leaving a total of five sites for further consideration. One of those sites was eliminated due to the discovery of an easement that made the site unsuitable resulting in four possible sites. Race, color, and national origin were not considered during the identification or evaluation of potential sites.

### **Community Outreach**

StarTran sought community input on the StarTran Facility Relocation Feasibility Study at the August 17, 2017 StarTran Advisory Board Meeting. At this public meeting StarTran staff presented the purpose and process of the study as well as the four candidate sites. Notification of this public meeting was made in the following ways:

1. Posted on StarTran website
2. Posted in the City/County Building meeting notices.
3. Email notification to stakeholders

During the course of the public comment period, one comment was received. A patron suggested concerns about down time in the event a bus breaks down and another bus able to replace it given the distances of the various proposed sites to current facility site. Using the Advisory Board public meeting is a strategy for public involvement as identified in StarTran's Public Participation Plan.

### **Benefits and Burdens Analysis**

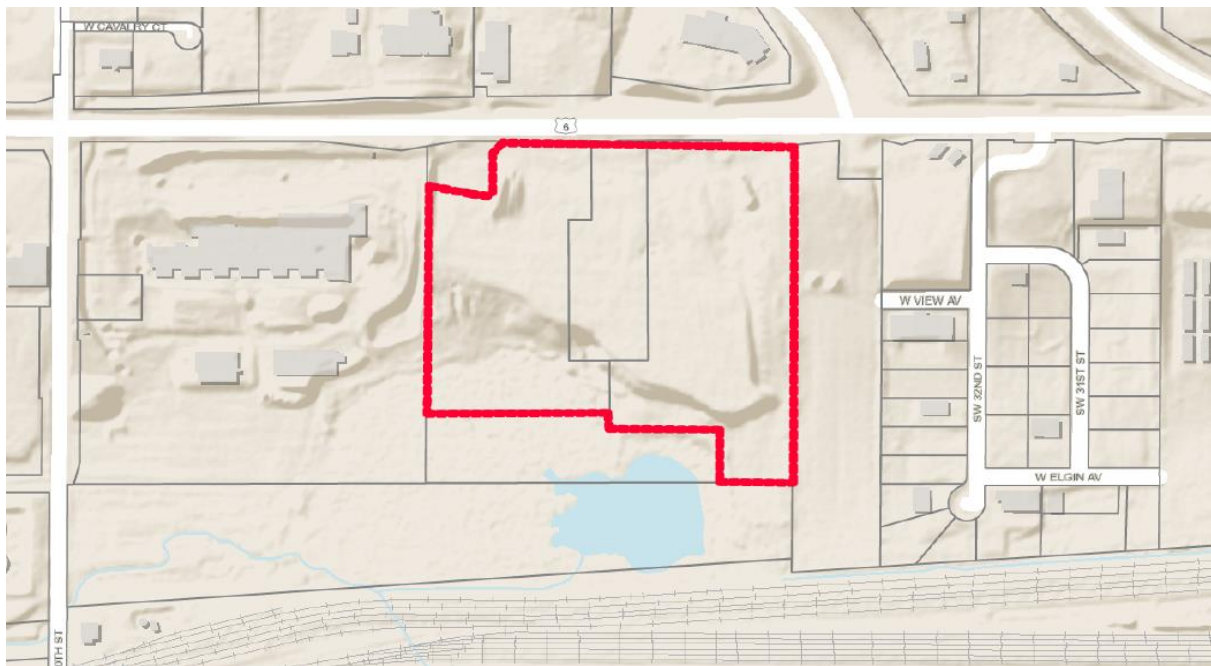
StarTran reviewed benefits and burdens of each site to determine any impacts that might adversely affect the community. There would be no displacement of residents or operating businesses at any of the four sites considered in this site selection. None of the sites have residential properties within the surrounding area, except the 2400 Theresa Street site which has a parcel of land north that is a mobile home housing area. Therefore, no persons are impacted by the siting of a facility.

Table 1: Benefits & Burdens

Site	Benefits/Positive Impacts	Burdens/Adverse Impacts
3301 West O Street	<ul style="list-style-type: none"> <li>- Low cost per acre</li> <li>- Excellent access downtown: minimal deadhead</li> </ul>	<ul style="list-style-type: none"> <li>- Adjacent to Lancaster County Department of Corrections which could create safety concerns.</li> </ul>
Waste Water Treatment Plant (2400 Theresa Street)	<ul style="list-style-type: none"> <li>- Compatible with surrounding area</li> </ul>	<ul style="list-style-type: none"> <li>- Residential Properties next to site</li> <li>- Adjacent to Waste Water Treatment Plant</li> <li>- Site in a flood plain</li> </ul>
545 West O Street	<ul style="list-style-type: none"> <li>- Excellent access downtown: minimal deadhead</li> </ul>	<ul style="list-style-type: none"> <li>- Existing buildings would need to be demolished</li> <li>- Site may have contamination that would need to be remediated</li> <li>- Site in a flood plain</li> </ul>
1001 Sun Valley Boulevard	<ul style="list-style-type: none"> <li>- Excellent access downtown: minimal deadhead</li> </ul>	<ul style="list-style-type: none"> <li>- Existing building would need to be demolished</li> <li>- Access to the site would be congested particularly during events</li> <li>- Site in a flood plain</li> </ul>

**Site Location Maps**

3301 West O Street



Waste Water Treatment Plant (2400 Theresa Street) – property is directly south of Waste Water Plant



545 West O Street



1001 Sun Valley Boulevard





## Alternatives Equity Analysis and Cumulative Impacts

While location, size, price and other criteria were used to select the candidate sites, StarTran analyzed demographics to ensure the site selection would have no disparate impact due to race, color, or national origin. StarTran looked at U.S. Census Tract Block Groups of each site and compared to demographics for the City of Lincoln as a whole.

Table 2: Demographic Data

	<b>3301 West O Street</b> Block Group 311090033021, Census Tract 33.02	<b>Waste Water Treatment Plant</b> (2400 Theresa Street) Block Group 311090030032, Census Tract 30.03	<b>545 West O Street</b> Block Group 311090034022, Census Tract 34.02	<b>1001 Sun Valley Boulevard</b> Block Group 311090033011, Census Tract 33.01	<b>City of Lincoln</b>
Total Population	4215	2094	2942	3048	273,018
White	3885	1780	2356	2753	234,285
Non-White	330	314	586	295	38,733
Non-White %	7.8%	15%	20%	10%	14.2%
Population under Poverty Line	61	164	98	346	16467
Percentage under Poverty Line	4.5%	22%	8.9%	28%	15.1%
Median Income (Households)	\$68,421	\$30,577	\$50,814	\$58,979	\$51,126
LEP %	3.0%	3.2%	2.6%	0.0%	3.1%

Source: Data from U.S. Census 2012-2016 American Community Survey 5 Year Estimates

## Conclusions

All locations identified and evaluated for consideration for a new StarTran Bus, Operations, and Maintenance Facility were selected without regard to race, color, or national origin.

An evaluation of the poverty rate, minority population rate (non-white), and LEP rate for the four sites showed no adverse impacts for the 3301 West O site. This site is located in a block group with lower averages than the City of Lincoln for minority, low-income and LEP populations. However, the other three sites showed possible adverse impact as the averages for minority, low-income and LEP were higher than City of Lincoln average. The yellow highlighted percentages show how the proposed sites compare to the percentage of the City of Lincoln (green highlighted). Although none of the proposed sites have residents or businesses on the properties the 3301 West O Site should be considered as a candidate for relocation of bus, maintenance and operations facility as this site showed no adverse impacts.

