HONOLULU CITY COUNCIL

KE KANIHELA O KE KALANA O HONOLULU

CITY AND COUNTY OF HONOLULU

No. 25-110

RESOLUTION

APPROVING THE DEPARTMENT OF TRANSPORTATION SERVICES' 2025 PUBLIC TRANSIT TITLE VI PROGRAM PURSUANT TO THE REQUIREMENTS AND GUIDELINES OF THE FEDERAL TRANSIT ADMINISTRATION'S TITLE VI CIRCULAR 4702.1.B.

WHEREAS, Title VI of the Civil Rights Act of 1964 (42 U.S.C. §2000d et seq.) prohibits discrimination on the basis of race, color, and national origin for recipients of federal financial assistance; and

WHEREAS, the Department of Transportation Services (DTS), as a recipient of Federal Transit Administration (FTA) financial assistance for the public transit system, must prepare and submit to the FTA a Title VI Program that is compliant with the requirements and guidelines of the FTA's Title VI Circular 4702.1.B (Circular); and

WHEREAS, the DTS prepared the attached 2025 Public Transit Title VI Program in compliance with the requirements and guidelines of the Circular and reported that the DTS provides public transit service in conformance with Title VI legislation that prohibits discrimination on the basis of race, color, and national origin; and

WHEREAS, the 2025 Public Transit Title VI Program must be approved by the City's governing entity, the Honolulu City Council, prior to submission to the FTA pursuant to the Circular's requirements and guidelines for fixed route transit providers; now, therefore,

BE IT RESOLVED by the Council of the City and County of Honolulu that the DTS' 2025 Public Transit Title VI Program, attached hereto and, by reference, made a part hereof, be approved; and

BE IT FURTHER RESOLVED that the DTS Director may make minor or editing changes to the DTS' 2025 Public Transit Title VI Program, attached hereto, provided that no substantial additions or deletions are made; and

HONOLULU CITY COUNCIL

KE KANIHELA O KE KALANA O HONOLULU

CITY AND COUNTY OF HONOLULU

No. 25-110

RESOLUTION

BE IT FINALLY RESOLVED that a copy of this resolution be transmitted to the DTS Director at 711 Kapi'olani Boulevard, Suite 1600, Honolulu, Hawai'i 96813.

INTRODUCED BY:

(br)

DATE OF INTRODUCTION:

APR 8 2025

Honolulu, Hawai'i

Councilmembers

2025
Public Transit Title VI Program
City and County of Honolulu
Department of Transportation Services

DRAFT

Questions/Comments

Phone: 808-768-8368
Email: thebusstop@honolulu.gov

2025 Public Transit Title VI Program

Introduction

The City and County of Honolulu (City) Department of Transportation Services (DTS) is responsible for providing fixed-route, i.e.TheBus, Skyline (rail line), and complementary ADA paratransit (TheHandi-Van) service for the island of Oahu. TheBus and TheHandi-Van are operated and maintained by Oahu Transit Services, Inc. (OTS), a private, not for profit management firm under contract with DTS. Skyline started revenue service on June 30, 2023, and its first segment consisted of nine stations between East Kapolei and Aloha Stadium. The second segment consists of four stations between Aloha Stadium and Middle Street, and is anticipated to start in late 2025. While Skyline is operated by DTS, the Honolulu Authority for Rapid Transportation (HART) is responsible for the planning and construction of the rail transit system, and its contractor by Hitachi Rail Honolulu JV, a private, for-profit firm which operates and maintains the system.

As of January 2025, TheBus operates 114 routes serving the major regions on the island of Oahu: Windward (Kahuku to Makapuu), Leeward (Makaha to Waipahu), Central Oahu (North Shore to Mililani) and the primary urban corridor (Pearl City to East Honolulu). The 114 routes are categorized into four (4) modes of service operating at various times throughout the week: Rapid Bus (limited stop), Trunk, Circulator, and Peak Hour Express. In this Title VI program report, 121 Routes (which includes discontinued or renumbered routes) are covered.

Title VI (TVI), codified at 42 U.S.C §2000d et seq., was enacted as part of the landmark Civil Rights Act of 1964 prohibiting discrimination against a broad range of protected classes, including race, color, and national origin in programs and activities receiving federal financial assistance. As a recipient of federal grant funds, DTS certifies to the Federal Transit Administration (FTA), upon execution of a master grant agreement and accompanying assurances and certifications, that public transit services are provided in compliance with Civil Rights legislation.

Recipients of FTA grants are required to prepare and submit a report every three (3) years to document that public transit services are provided in a nondiscriminatory manner. The 2025 Public Transit TVI Program report is due to the FTA by June 1, 2025. The requirements for preparing this TVI Program report are outlined in Chapters 3 & 4, “FTA TVI Circular C 4702.1B (Circular)”.

Part I of this report addresses the Circular’s general requirements in Chapter 3 that are applicable to all FTA grantees. These requirements include: Program Contents, Public Notice, Complaint Procedures/Form, Investigations/Complaints/Lawsuits, Public Participation Plan/Process, Language Services for Limited English Proficient (LEP) Persons, Minority Representation on Planning/Advisory Boards, Subrecipient Assistance/Monitoring, Facility Site/Location Selection, and Approval by Governing Entity.

Part II of this report addresses the Circular’s Chapter 4 requirements that are applicable to fixed route transit providers who operate 50 or more fixed route vehicles in peak service and located in an urbanized area of 200k or more in population. The requirements include: Program Contents, System-Wide Service Standards/Policies, Demographic Data, Transit Service Monitoring, and Evaluation of Service/Fare Changes. The transit service monitoring report documents TheBus service performance for all 114 routes against the system-wide service standards and policies to identify disparities between routes serving minority and nonminority populations. (Attachment 7)

The impacts of the pandemic emergency significantly decreased system-wide ridership; at the onset in early 2020 ridership dropped to approximately 40% of pre-pandemic levels and now, four years since the start of the pandemic, ridership has rebounded slightly to approximately 65% of pre-pandemic levels. TheBus routes/schedules continue to be evaluated/adjusted to address the changes in ridership, service demand/productivity, operating costs, and resource/budget allocations.

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I. GENERAL REQUIREMENTS AND GUIDELINES FOR ALL FTA RECIPIENTS

Section 1: Requirement to Notify Beneficiaries of Protection Under Title VI

Title 49 CFR Section 21.9(b) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, recipients shall disseminate this information to the public by posting a Title VI notice on the agency's website and in public areas of the agency's office(s), including the reception desk, meeting rooms, etc. Recipients should also post Title VI notices at stations, stops, and/or on transit vehicles. The notices shall be translated into languages other than English, as needed and consistent with the DOT LEP Guidance and the recipient's language assistance plan.

The Title VI (TVI) Notice to the Public is posted at the following locations.

- Department of Transportation Services, Transportation Mobility Division, 12th Floor reception area.
- Oahu Transit Services: TheBus Customer Service Office, TheBus Pass Office.
- TheHandi-Van Eligibility Center.
- Car cards within fixed route public transit vehicles.
- Websites:
    - City & County of Honolulu Department of Transportation Services

      https://www8.honolulu.gov/dts/title-vi/

    - Oahu Transit Services: TheBus and TheHandi-Van

      http://www.thebus.org/AboutTheBus/TitleVI.asp

      http://www.thebus.org/thehandivan/TitleVI.asp

The TVI Notice is also mailed out in all TheHandi-Van Eligibility Center recertification and new applicant packages.

The TVI Notice is shown on pages 6 and 7.

Notifying the Public of Rights Under Title VI

The City and County of Honolulu

The City and County of Honolulu 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 she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City and County of Honolulu.

For more information on the City and County of Honolulu's civil rights program, and the procedures to file a complaint, contact 808-768-8368; email thebusstop@honolulu.gov; or visit our administrative office at 711 Kapiolani Boulevard, 12th Floor, Honolulu, Hawaii 96813. For more information, visit https://www8.honolulu.gov/dts/title-vi/

If information is needed in another language, call 808-768 8368.

- 如需此信息的其他语言版本, 请致电808-768-8368.
- Ika e auchea epwe kawor awewen poraus non kapasen ew fonu, kokori 808-768-8368.
- No masapul ti impormasion iti sabali a lengguahe, awagan ti 808-768-8368.
- 他の言語での情報が必要でしたら808-768-8371までお電話ください.
- Kung kinakailangan ang impormasyon sa ibang wika, tumawag sa 808-768-8368.



Department of Transportation Services

TheHandi-Van

Notifying the Public of Rights Under Title VI

The City and County of Honolulu

- The City and County of Honolulu 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 she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City and County of Honolulu.
- For more information on the City and County of Honolulu's civil rights program, and the procedures to file a complaint, contact (808) 768-8300; email handivan@honolulu.gov; or visit our administrative office at 711 Kapiolani Boulevard, 12th Floor, Honolulu, Hawaii 96813. For more information, visit https://www.honolulu.gov/dts/aboutus/transportation-mobility/183-site-dts-cat/1883-thebus-non-discrimination-title-vi-policy.html.
- If information is needed in another language, call (808) 768-8300.
    - 如需此信息的其他语言版本, 请致电 (808) 768-8300.
    - Ika e auchea epwe kawor awewen poraus non kapasen ew fonu, kokori (808) 768-8300.
    - No masapul ti impormasion iti sabali a lengguahe, awagan ti (808) 768-8300.
    - 他の言語での情報が必要でしたら (808) 768-8300 までお電話ください.
    - Kung kinakailangan ang impormasyon sa ibang wika, tumawag sa (808) 768-8300.

The TVI Car Card is shown below.

THIS PUBLIC TRANSIT SYSTEM DOES NOT DISCRIMINATE BASED ON RACE, COLOR, OR NATIONAL ORIGIN AND ENSURES TRANSPORTATION EQUITY FOR ALL COMMUNITIES REGARDLESS OF INCOME LEVEL.

该公共交通系统不应基于种族、肤色或国家原籍进行歧视，并保证所有社区无论收入水平均享有公平的交通运输。

ESAP WOR NIFINIFIN NGENI ARMAS WON EI SEIN MUUN REN NEO, ONUWEN INIS, IKA CHON IA PWE EPWE CHON ANONOU FENFENI MOKUTUN SAI NGENI KOMUNITY MEINISIN INAMOW IKA ESE NONOFONGON MONI NON.

Daytoy a Sistema ti Pangpubliko a Transportasion ket saan a mangidumduma gapu iti puli, kolor ti kudil, wenno naggapuan a pagilian ken siguraduenna iti patas a serbisio ti transportasion para iti amin a komunidad uray no ania ti level ti sueldo.

公共交通機関は人種、肌の色、国籍によって差別をすることはありません。また収入のレベルにかかわらず、どの地域社会にも交通機関の利用機会が公平にあることを保証します。

Ang Public Transit System na ito ay hindi nandidiskrimina batay sa lahi, kulay, o bansang pinagmulan at sinisiguro ang karampatang transportasyon para sa lahat ng mga komunidad anuman ang antas ng kita.

Questions/Complaints 问题/投诉 **KAPAS EIS/MET KE OPUT** Saludsod/Reklamo 質問／苦情 **Mga Tanong/Mga Reklamo**
(808) 768-8374 thebusstop@honolulu.gov www.honolulu.gov/dts www.thebus.org Paid for by the taxpayers of the City & County of Honolulu

Section 2: Requirement to Develop Title VI Complaint Procedures and Complaint Form

In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), all recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. FTA requires direct and primary recipients to report information regarding their complaint procedures in their Title VI Programs in order for FTA to determine compliance with DOT's Title VI regulations.

In addition to developing complaint procedures, recipients must also develop a Title VI complaint form, and the form and procedure for filing a complaint shall be available on the recipient's website.

The TVI Complaint Procedures and Form are on the following websites:

- City & County of Honolulu Department of Transportation Services (DTS)

  https://www4.honolulu.gov/docushare/dsweb/View/Collection-13230

- Oahu Transit Services (OTS): TheBus and TheHandi-Van

  http://www.thebus.org/AboutTheBus/TitleVI.asp

  http://www.thebus.org/thehandivan/TitleVI.asp

Complaint Forms (Attachment 1) are available at the following locations and in the languages identified in the Limited English Proficient (LEP) Plan (Attachment 3).

- Download from DTS and OTS websites listed above.
- Through mail or email by calling DTS at (808)768-8368, or emailing TheBusStop@honolulu.gov or handivan@honolulu.gov
- In-person at:
  DTS (711 Kapiolani Boulevard, 12th Floor)
  OTS TheBus Customer Service Office (811 Middle St.)
  OTS TheBus Pass Office (Kalihi Transit Ctr, Middle St. at Kamehameha Hwy.)
  TheHandi-Van Eligibility Center (1100 Ward Ave., Suite 835)

The Complaint Process displayed below has been extracted from the official DTS website: https://www8.honolulu.gov/dts/title-vi/

Title VI Non-Discrimination Policy

The City and County of Honolulu, Department of Transportation Services (DTS), as a recipient of Federal funds, has certified and provided assurances that it, and Oahu Transit Services, Inc. (OTS), the non-profit corporation contracted by DTS to provide TheBus and TheHandi-Van services, will fully comply with Title VI of the Civil Rights Act of 1964. DTS, and OTS, are committed to ensuring that no person using public transit services is discriminated against on the basis of race, color, or national origin, particularly in the following service areas:

- Scheduling
- Quality of service
- Frequency of service
- Age and quality of vehicles assigned to routes
- Transit amenities serving different routes
- Location of routes

Title VI Notice

The City and County of Honolulu operates its programs and services without regard to race, color, and nation origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint with the City and County of Honolulu.

TheBus Title VI Notice Downloads:

- English (32KB DOC)
- Chinese (中文) (42KB DOC)
- Japanese (日本語) (41KB DOC)
- Ilokano (42KB DOC)
- Tagalog (42KB DOC)
- Chuukese (Kapasen Chuuk) (47KB DOC)

TheHandi-Van Title VI Notice Downloads:

- English (655KB DOC)
- Chinese (中文) (671KB DOC)
- Japanese (日本語) (670KB DOC)
- Ilokano (670KB DOC)
- Tagalog (671KB DOC)
- Chuukese (Kapasen Chuuk) (671KB DOC)

What is Title VI

Title VI of the Civil Rights Act of 1964 prohibits discrimination in programs and activities receiving Federal financial assistance on the basis of race, color, or national origin.

The City and County of Honolulu, Department of Transportation Services (DTS), and the non-profit corporation it has contracted to provide fixed route services, "TheBus," and paratransit services, "TheHandi-Van," are committed to ensuring that no person is discriminated against while using TheBus or TheHandi-Van as prohibited by Title VI of the Civil Rights Act of 1964.

Title VI protections have been extended via two Presidential Executive Orders to Environmental Justice, which also protects persons of low income, and Limited English Proficiency.

Who can complain

Anyone who believes that she or he has been discriminated against while using TheBus or TheHandi-Van may file a Title VI complaint with DTS.

How to file a Title VI discrimination complaint

If a person believes she or he has been discriminated against in using TheBus or TheHandi-Van, they may file a signed, written complaint within one hundred eighty (180) days of the date of alleged discrimination. Complaints should provide the following information:

- Complainant's name, address, and contact information (telephone number, email address, etc.)
- How, when, where, and why the complainant believes he or she was discriminated against
- Location, names, and contact information of any witnesses

File the complaint in writing with DTS, Transportation Mobility Division at:

Bus Service and Operations
Transportation Mobility Division
Department of Transportation Services
City & County of Honolulu
711 Kapiolani Boulevard, 12th Floor
Honolulu, Hawaii 96813

Email: TheBusStop@honolulu.gov
Phone: (808) 768-8368

Paratransit Service and Operations
Transportation Mobility Division
Department of Transportation Services
City & County of Honolulu
711 Kapiolani Boulevard, 12th Floor
Honolulu, Hawaii 96813

Email: handivan@honolulu.gov
Phone: (808) 768-8300

If the complainant is unable to write a complaint, DTS will provide assistance.

Printable Complaint Form Downloads:
https://www4.honolulu.gov/docushare/dsweb/View/Collection-13230

In addition to the Title VI complaint process at DTS, a complainant may also file a Title VI complaint with an external entity, such as:

- U.S. Department of Transportation
  Federal Transit Administration
  Office of Civil Rights, Region IX
  201 Mission Street, Suite 1650
  San Francisco, California 94105-1839

- Other agency, Federal or state

- A court, Federal or state

If a complaint is filed with both DTS and an external entity, the external complaint will supersede the DTS complaint and DTS' complaint procedures will be suspended until the external entity produces its findings.

How DTS handles complaints

Complaints that allege discrimination while using TheBus or TheHandi-Van services, provided by DTS, through OTS, will be recorded in the Discrimination Complaint Log and immediately assigned a complaint number by DTS, Transportation Mobility Division.

DTS will review the Title VI complaint and will provide appropriate assistance to complainants, including those who have Limited English proficiency (LEP).

DTS will investigate a formal Title VI complaint within ten (10) working days of receiving the complaint. Based upon all of the information received, DTS will prepare a draft written response, subject to review by the City & County of Honolulu's Corporation Counsel.

DTS will contact the complainant in writing within fifteen (15) working days for additional information, if needed, to investigate the complaint. If the complainant fails to provide the requested information by a certain date, the complaint could be administratively closed.

Corporation Counsel will determine if the complaint may be administratively closed after the draft is written, or if a final written response is needed. If a final written response is needed, DTS will send the response to the complainant and advise the complainant of his or her right to file a complaint externally.

The complainant also will be advised of his or her right to appeal the response to Federal and state authorities as appropriate. DTS will diligently attempt to respond to a complaint within sixty (60) working days of its receipt by DTS, unless it was also filed with an outside agency, as noted above.

How DTS notifies a complainant of the outcome

DTS will send a final written response to the complainant and advise the complainant of his or her right to file a complaint externally. DTS will diligently attempt to respond to complaints within sixty (60) workdays of its receipt.

Section 3: Requirement to Record and Report Transit-Related Title VI Investigations, Complaints, and Lawsuits

In order to comply with the requirements of 49 CFR Section 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by the entities other than FTA; lawsuits; and complaints naming the recipient. This list shall include the date that the investigation, lawsuit, or complaint was filed; summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to, the investigation, lawsuit, or complaint.

The table below lists DTS' and OTS' Title VI investigations, complaints, and lawsuits for the period May 2022 to January 2025.

Title VI Log: Investigations, Complaints, and Lawsuits				
	Date	**Grounds of Complaint**	**Status**	**Action(s) Taken**
Investigations				
2022-015	05/4/2022	Race	Submitted to HCRC for Review	Pending
2022-016	05/4/2022	Race	Submitted to HCRC for review	Pending
2022-026	05/25/2022	Race	Refereed to City Corporation Counsel	Pending
2023-021	01/27/2023	Race	Closed	No Cause
Complaints				
2022-021	05/12/2022	Race	Closed	Reported to HPD
2023-026	02/03/2023	Race	Closed	Employee advised
2023-070	03/06/2023	Race	Invalid	Closed
2023-103	04/06/2023	Race	Invalid	Closed
2023-160	05/18/2023	Race	Invalid	Closed
2023-191	06/1/2023	Race	Invalid	Closed
2023-310	10/4/2023	Race	Invalid	Closed
2024-189	04/17/2024	Race	Closed	Employee disciplined
2024-213	04/15/2024	National Origin	Invalid	Closed
Lawsuits				
None				

EEOC: Equal Employment Opportunity Commission
Hawaii Civil Rights Commission: HCRC

Section 4: Promoting Inclusive Public Participation

The content and considerations of Title VI, the Executive Order on LEP, and the DOT LEP Guidance shall be integrated into each recipient's established public participation plan, which explicitly describes the proactive strategies, procedures, and desired outcomes that underpin the recipient's public participation activities. Efforts to involve minority and LEP populations in public participation activities can include both comprehensive measures, such as placing notices at all transit stations, stops, and vehicles, as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in a recipient's decision-making process.

Promoting inclusive public participation for TheBus service changes is accomplished through DTS Transportation Mobility Division (TMD) Public Participation Standard Operating Procedure (SOP) No. 7-1.19. Attachment 2 includes SOP 7-1.19 and the list of outreach activities for the last three (3) years (2022, 2023, 2024) since the 2022 Title VI Program.

Outreach measures for the 2025 Public Transit TVI Program*, include the following:

- Honolulu City Council
  - Presentation at the Council Transportation Committee Meeting.
  - Presentation to individual Councilmembers upon request.
  - Adoption at the Honolulu City Council Meeting.

- Neighborhood Boards
  - Distribution to the 33 Boards for dissemination to the community.
  - Presentation at Board meetings made upon request.

- Committee for Accessible Transportation
  - Distribution to committee members.
  - Presentation made upon request.

- Electronic Information
  - Posted to the DTS and OTS TheBus & TheHandi-Van websites.

- Other Means/Methods
  - Coordination with other Agencies.
  - Screen reader format for persons with low vision upon request.
  - Mail or email upon request.

*Public feedback on the 2025 Public Transit TVI Program is shown in Attachment 2.

Section 5: Requirement to Provide Meaningful Access to Limited English Proficient Persons

Consistent with Title VI of the Civil Rights Act of 1964, DOT's implementing regulations, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, Aug. 11, 2000), recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited English proficient (LEP). The recipient shall develop an assistance plan to address the identified needs of the LEP population(s) it services.

DTS is committed to providing meaningful access to its services by Limited English Proficient (LEP) persons. The 2025 LEP Plan was updated in January 2025 and identifies appropriate language assistance measures needed to improve access to public transit services by LEP persons.

DTS utilizes contracted phone interpretation services (over 100 languages) and translates vital documents in the languages identified in the LEP Plan; translation in other languages may be provided to the maximum extent feasible and on a case-by-case basis.

Language assistance training is provided to all frontline transit staff during new hire classes and refresher training sessions.

A copy of the updated LEP Plan is shown in Attachment 3.

Section 6: Minority Representation on Planning and Advisory Bodies

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, "deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program." Recipients that have transit-related, nonelected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

DTS is not involved in the selection of members for the following committees or boards and is thus excluded from providing a racial breakdown table and description of efforts made to encourage participation of minorities on such committees:

The Honolulu City Council (Council) - the City's approving body and its nine members are elected; The Rate Commission and Committee for Accessible Transportation (CAT)- are two (2) DTS advisory committees that are comprised of non-elected members. The Honolulu Authority for Rapid Transit (HART) is a semi-autonomous City agency and subrecipient of DTS' FTA grant funding.

Rate Commission: The seven (7) Rate Commission members are non-elected volunteer members. Three (3) members are appointed by the mayor. Three (3) members are appointed by the Council. The Rate Commission Chair is nominated by the Mayor and confirmed by the Council. Although not required, the current 2024 rate commission board has elected to share their racial background as such: White (2), Asian-Pacific Islander (3), Two or more races (1), and one vacant position.

CAT: The CAT is comprised of representatives from the 12 agencies listed below and two (2) At Large members:

- Access to Independence
- Adult Day Centers of Hawaii
- Catholic Charities Hawai'i
- Easterseals Hawaii
- Hawaii Disability Rights Center
- Ho'opono Services for the Blind
- KOKUA Program: University of Hawaii Manoa
- Lanakila Pacific
- State Department of Health
- Disability and Communication Access Board
- Oahu Metropolitan Planning Organization
- Oahu Transit Services, Inc.
- Ms. Charlotte Townsend (1st At Large member)
- Mr. Donald Sakamoto (2nd At Large member)

HART: The current HART Board of Directors consists of twelve (12) non-elected, volunteer members. Three (3) members are appointed by the Mayor, three (3) members are

appointed by the City Council, three (3) members are Ex Officios, and two (2) members are appointed by the State Legislature, one member (1) is appointed by the HART Board.

Section 7: Monitoring Subrecipients

In accordance with 49 CFR 21.9(b), and to ensure that subrecipients are complying with the DOT Title VI regulations, primary recipients must monitor their subrecipients for compliance with the regulations. Importantly, if a subrecipient is not in compliance with the Title VI requirements, then the primary recipient is not in compliance.

In order to ensure subrecipients are in compliance with TVI requirements, subrecipients may develop their own TVI program or follow DTS' Public Transit TVI program. DTS will assist all subrecipients with Title VI compliance as necessary and appropriate.

Subrecipients who develop their own TVI program must submit it to DTS for compliance review every three years.

DTS monitors all subrecipients for TVI compliance on an annual basis through on-site visits, communication, and review of relevant records, documents, and website content. Subrecipients are notified of monitoring results within 30 days of the monitoring completion date. If a subrecipient is determined to be non-compliant, deficiencies must be corrected within 30, 60, or 90 days of the monitoring completion date. DTS will issue a notice that corrective actions have been satisfactorily completed within 30 days of the completion date.

A copy of DTS-TMD's TVI Oversight of Subrecipients, Lessees, and Third Party Contactors policies, procedures, and monitoring checklists can be found at Attachment 4.

Section 8: Determination of Site or Location of Facilities

The recipient shall complete a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. Facilities include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. Facilities do not include bus shelters and transit stations, power substations, etc. are evaluated during project development of the NEPA process.

There are no proposed projects in the site selection planning stage.

A copy of DTS-TMD's Determination of Site or Location of Facilities policies and procedures can be found at Attachment 5.

Section 9: Approval of the TVI Program by Governing Entity

The recipient must provide a copy of board meeting minutes, resolutions, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved by the Title VI Program. The approval must occur prior to submission to the FTA.

DTS will submit the 2025 Public Transit Title VI Program to the Honolulu City Council for approval through its Transportation Committee, where it needs to be recommended for approval and transmitted to full Council vote.

II. REQUIREMENTS AND GUIDELINES FOR FIXED ROUTE TRANSIT PROVIDERS

Section 10: Requirement to Set System-wide Service Standards

This requirement applies to all fixed route providers of public transportation service. Appendix C to 49 CFR part 21 provides in Section (3)(iii) that "*no person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of service of transportation service furnished as a part of the project on the basis of race, color, or national origin. Frequency of service, age, and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes may not be determined on the basis of race, color, or national origin."

System-Wide Service Standards:

- Vehicle Load for each mode for each time period
- Vehicle Headway for each mode for each time period
- On-time Performance for each mode for each time period
- Service Availability

TheBus Service Modes:

- Rapid Bus (Limited Stop) Routes
- Trunk Routes
- Circulator Routes
- Peak Hour Express Routes

TheBus Service Time Periods:

- Weekday:
    - Early Morning (12am - 6am)
    - AM Peak (6am - 9am)
    - Base (9am - 2pm)
    - PM Peak (2pm - 6pm)
    - Night (6pm - 12am)

- Weekend All Day

Vehicle Load

For most of the time, TheBus services operate with sufficient frequency to provide every passenger with a seat. However, during the heaviest travel times or locations, passengers will experience standing loads. During these periods, DTS strives to provide sufficient service so that passengers are reasonably comfortable.

The purpose of the vehicle load standard is to define the levels of crowding that are acceptable by mode and time period. DTS defines vehicle load factor as the ratio of passengers on board to the number of seats on a vehicle. There are a number of different types of vehicles in the TheBus fleet at any given time, and the fleet changes over time. Hence, the actual seating capacity and maximum number of passengers allowed by the comfort standards for each mode changes periodically.

The DTS will measure the passenger miles that experiences overcrowded conditions during each time period. The DTS standard is that no more than 10% of annual passenger miles shall exceed the vehicle load factor standard for overcrowding. DTS will evaluate routes that do not meet the 10% standard to address overcrowding.

Maximum vehicle load factors for all modes and periods are defined in the following table.

Maximum Vehicle Load Factor Standard					
	Weekday				**Weekend**
Service Mode	**AM Peak (1st bus – 9am)**	**Base (9am – 2pm)**	**PM Peak (2pm – 6pm)**	**Night (6pm – last bus)**	**All Day**
Rapid Bus	1.4	1.2	1.4	1.2	1.2
Trunk	1.4	1.2	1.4	1.2	1.2
Circulator	1.4	1.2	1.4	1.2	1.2
Peak Hour Express	1.2	NA	1.2	NA	1.2

Vehicle Headway

Vehicle headway is defined as amount of time between two vehicles traveling in the same direction on the same route. Scheduling headway across service modes and time periods is affected by the following factors, including but not limited to: ridership, route length, traffic congestion/conditions, population density, demand generators, and budget constraints.

There is no headway standard for Peak Hour Express; headway is scheduled to meet demand.

Vehicle Headway Standard (in minutes)					
	Weekday				
Service Mode	AM Peak (1st bus – am)	Base (9am – 2pm)	PM Peak (2pm – 6pm)	Night (6pm – last bus)	Weekend All Day
Rapid Bus	15-30	15-40	10-30	15-50	20-60
Trunk	10-60	10-60	10-50	20-60	20-60
Circulator	20-60	20-60	20-60	30-60	30-60
Peak Hour Express	D	NA	D	D	D

D: As appropriate to meet demand

On-Time Performance

The average measure of runs completed as scheduled.

- On-time is measured as 2 minutes early to 5 minutes late of scheduled arrival and departure times.
- Early is greater than 2 minutes of the scheduled departure time.
- Late is greater than 5 minutes of the scheduled arrival time.

The Standard for all service modes is 80%.

Service Availability

A general measure of the distribution of routes within an agency's service area.

Standard:
Route availability within a ½ mile radius for 80% of the population.

Section 11: Requirement to Set System-wide Service Policies

Policies must include:

- ***Distribution of transit amenities for each mode***
- ***Vehicle assignment for each mode***

Distribution of Transit Amenities

Items of comfort, convenience, and safety, such as seating, shelter, trash receptacles, and lighting. Policy:

- All amenities shall comply with ADA Accessibility Guidelines (ADAAG)
- Installation at stops along bus routes are typically based on number of passenger boardings, number of routes served, transfer point, headways, and space requirements.

Amenities	Stop Characteristics for Distribution
Shelter	Transfer points, two or more bus routes, headways >40 minutes, average to high proportion of passenger boardings in relation to route ridership
Bench	Transfer points, two or more bus routes, headways >30 minutes, average proportion of passenger boardings in relation to route ridership
Trash Receptacle	Transfer points, two or more bus routes, headways >15 minutes, medium to high proportion of passenger boardings in relation to route ridership and/or adjacent to trash receptacle use generator(s).
Lighting	Lighting is typically provided by the existing street light infrastructure.
Provision of Information	As needed and appropriate

Vehicle Assignment

Process by which transit vehicles are assigned to routes. All buses are wheelchair accessible and equipped with bike racks. Low floor buses have ramps and high floor buses have lifts. Policy:

- Vehicles assignments are typically based on the operating characteristics of the route such as ridership, service mode, and roadway conditions (narrow, steep, tight turns).
- 60-foot buses are assigned to Rapid Bus, high ridership, or long-distance routes.
- 40-foot buses to trunk/circulator routes/peak hour express.
- 30/35-foot buses to circulator/community access routes where ridership complements vehicle capacity and routes with streets that are narrow, steep, or have tight turns.
- High floor buses (HF), while no longer manufactured and older in age, have a greater seating capacity than low floor buses and are equipped with a wheelchair lift instead of a ramp. They are assigned to routes with unimproved right-of-ways where lifts are more conducive, to routes that serve areas prone to ponding/flooding conditions, and to routes where ridership is a little too high to be adequately accommodated by a low floor bus. There are only nine HF buses in service and they are projected to be phased out by June 2025.
- Assignment of electric buses are based on route time/distance and location of charging stations.

Section 12: Requirement to Collect and Report Demographic Data

Title 49 CFR 21.9 (b) states that recipients "should have available for the Secretary racial and ethnic data showing the extent to which members of minority groups are beneficiaries of programs receiving Federal financial assistance." FTA requires transit providers to prepare the following maps and charts:

Demographic data for Maps 1 – 4 and Figures 1 - 2 are made from the Remix transportation planning software that has been embedded with GIS shape files and data from the United States Census Bureau, 2020 Decennial Census.

For the purpose of this report, these maps are reduced samples of the full large scale maps available at DTS and contain only the details that were visible at the reduced scale.

- Map 1 Base Service Area: Base map of the service area that overlays Census block groups, with bus facilities, transit centers, park-and-rides, and bus routes.

- Map 2 Title VI Areas: Demographic map that plots the bus routes shown in the base service area and shades those Census block groups where the percentage of the total minority population residing in these areas exceeds the average percentage of minority populations for the service area as a whole.

- Map 3 Environmental Justice Areas: Demographic map that plots the bus routes shown in the base service area and shades those Census block groups where the percentage of the total low income population residing in these areas exceeds the average percentage of low income populations for the service area as a whole.

- Map 4 Title VI & Environmental Justice Areas: Demographic map that plots the bus routes shown in the base service area and combines the Title VI and Environmental Justice areas shown in Maps 2 and 3. Shaded areas indicate minority, low income, and a combination of minority and low income Census block groups.

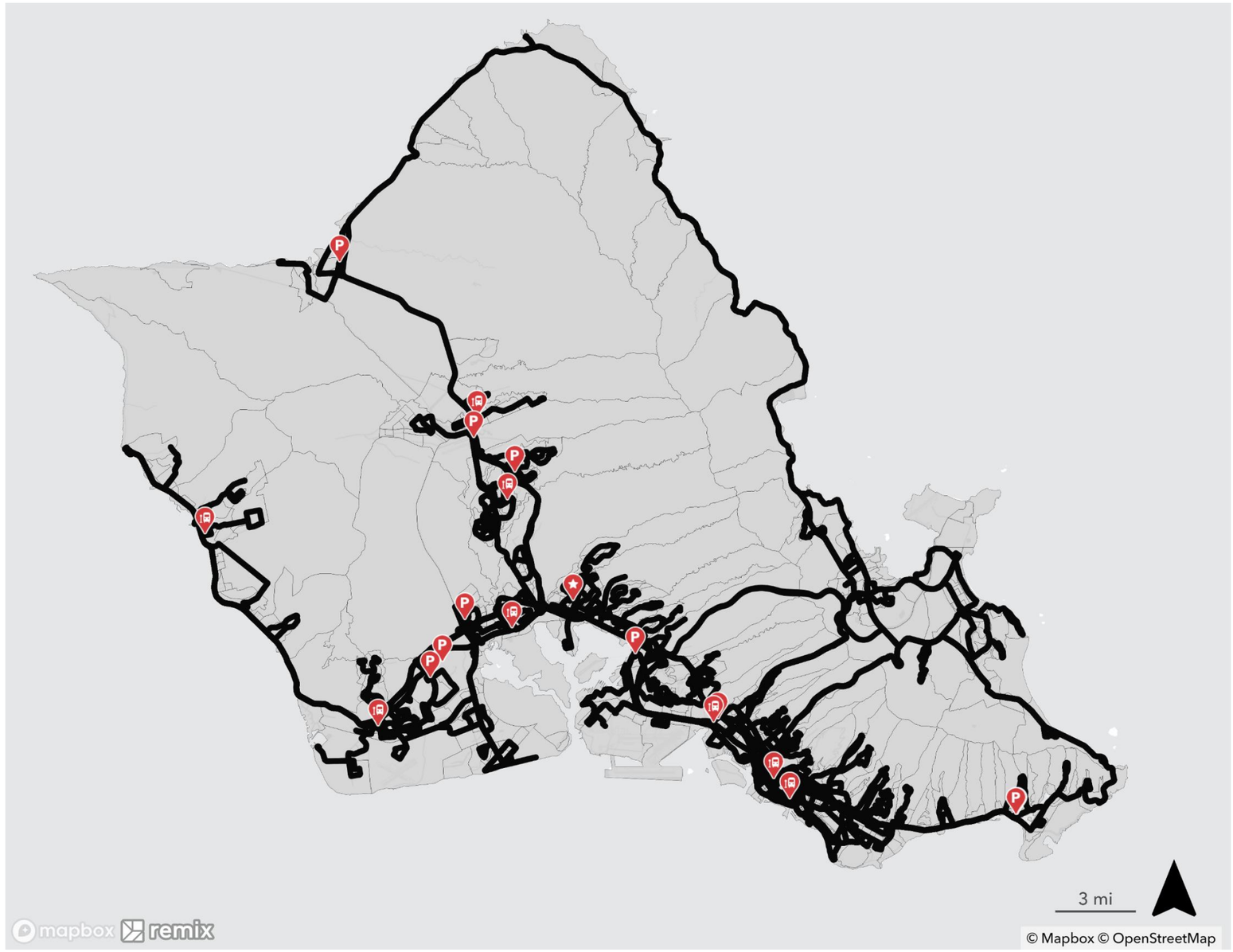
The following are also included:

- Link to individual route maps: http://www.thebus.org/Route/Routes.asp

- Figure 1 showing the ethnic group breakdown of Honolulu based on data from the US Census Bureau 2020 Decennial Census.

- Figure 2 listing the 114 bus route service areas and the percentage of TVI/EJ populations in the service area.

Map 1: Base Service Area



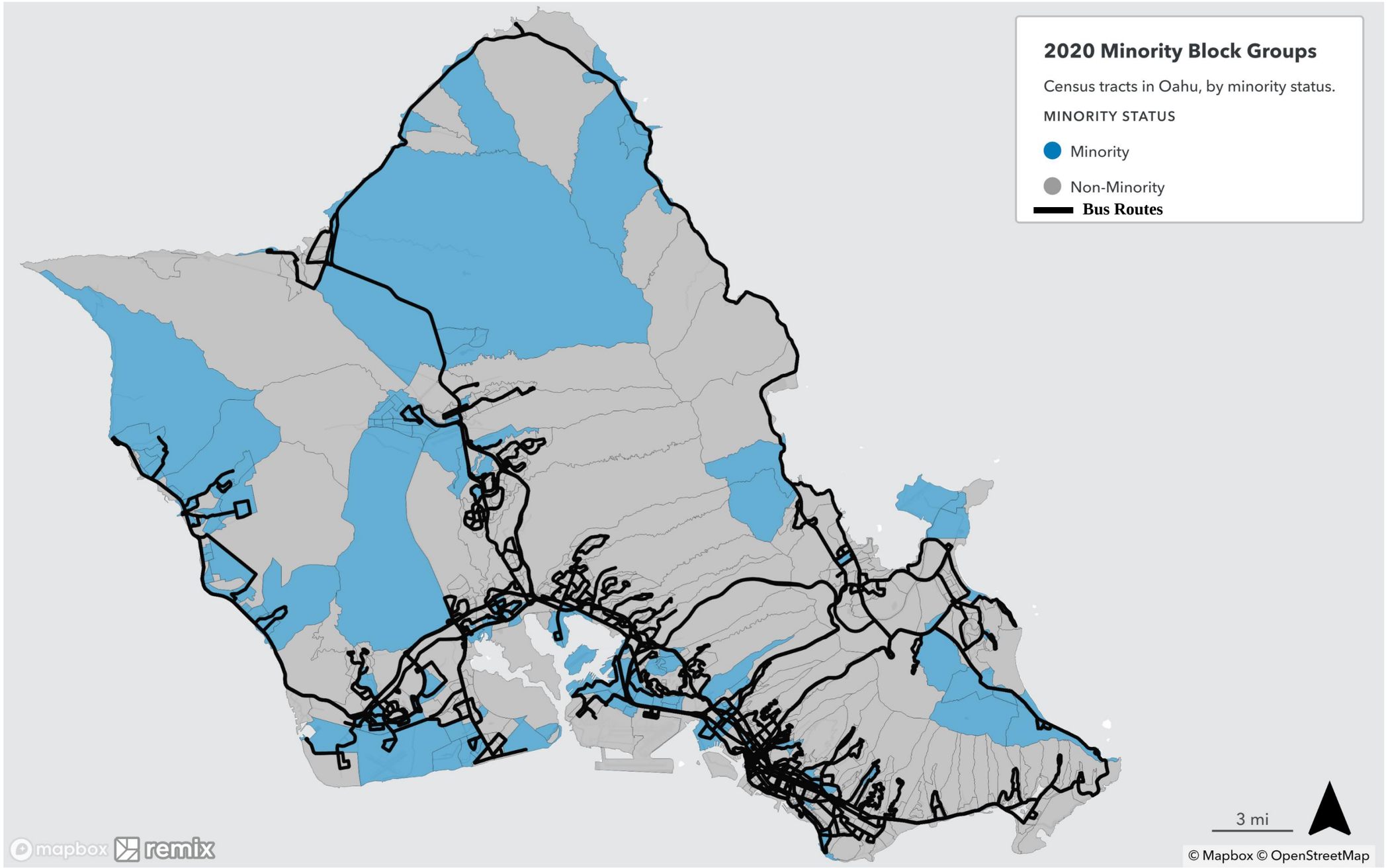
Oahu Bus Facilities -2024

All Bus Facilities, Transit Centers, and Park and Rides in Oahu

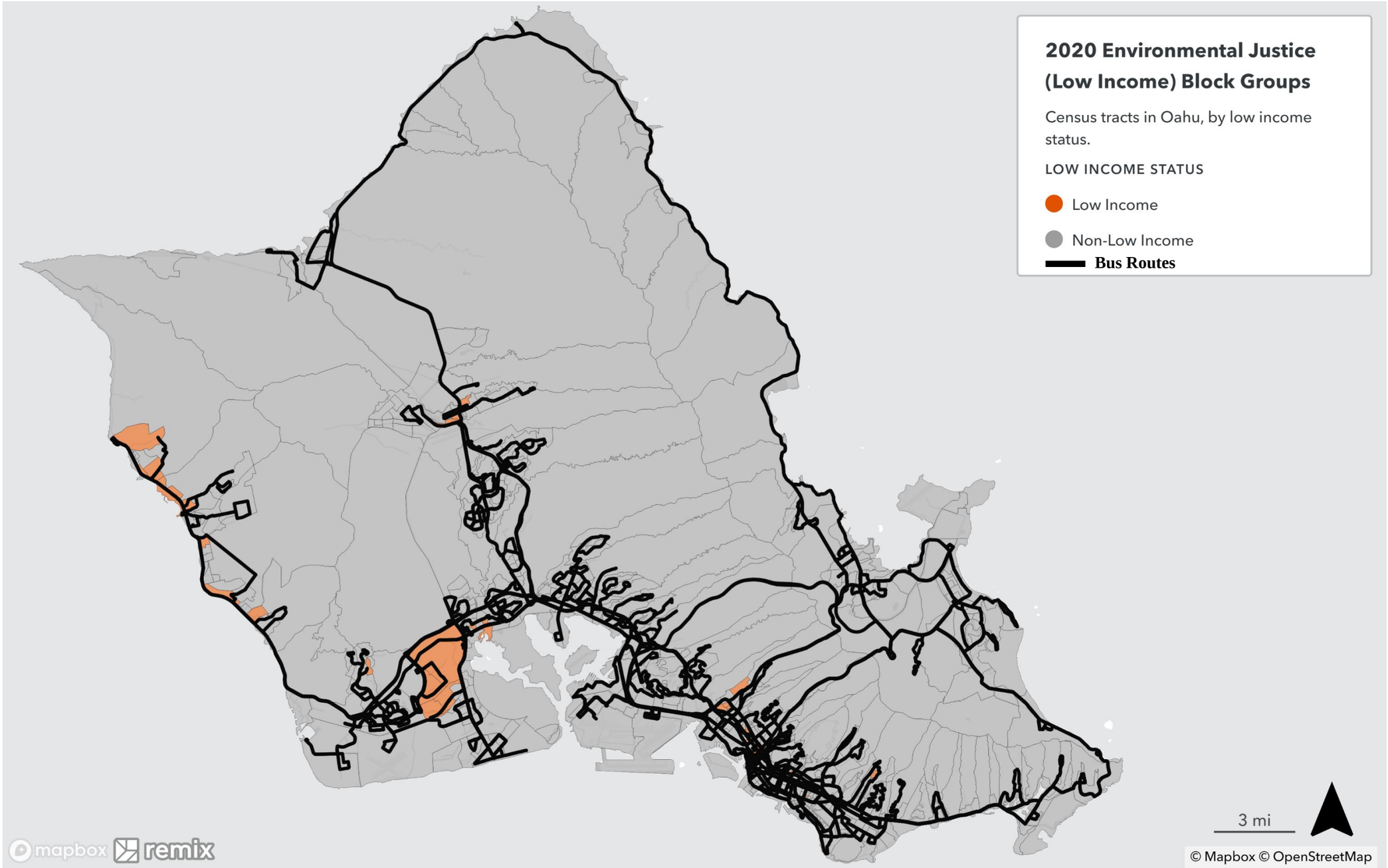
- Alapai Transit Center
- Ala Moana Center Bus stops
- Hawaii Kai Transit Center
- Kalihi Transit Center
- Kapolei Transit Center
- Wahiawa Transit Center
- Waipahu Transit Center
- Waianae Transit Center
- Mililani Transit Center
- Haleiwa
- Honouliuli - Ho'opili
- Halawa- Aloha Stadium
- Hawaii Kai
- Keone'ae - UH West O'ahu
- Mililani
- Wahiawa
- Royal Kunia
- Kalihi-Palama Bus Facility
- Pearl City Bus Facility

Bus Routes

Map 2: Title VI Areas



Map 3: Environmental Justice Areas



Map 4: Title VI and Environmental Justice Areas

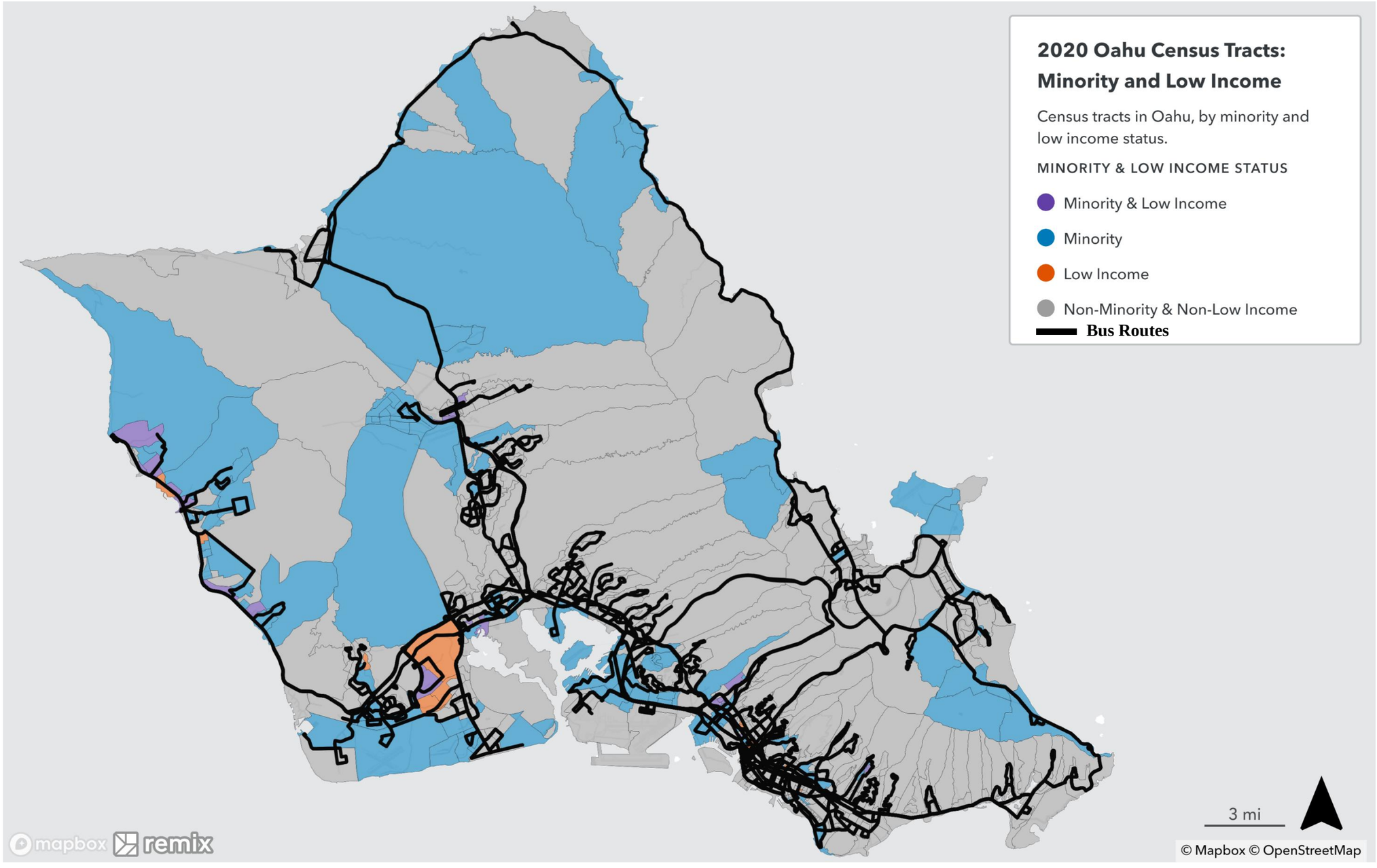
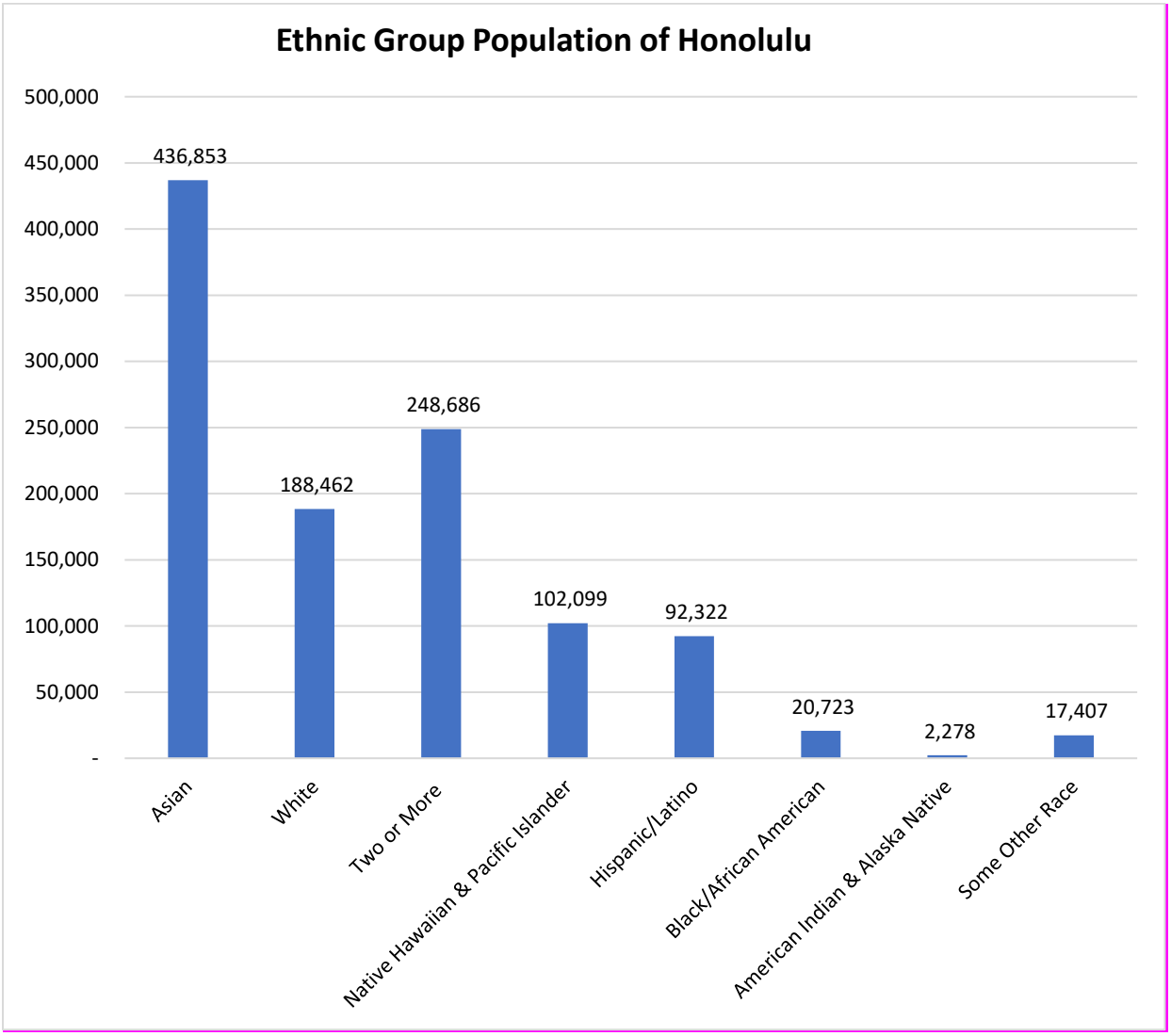


Figure 1
Ethnic Breakdown



(Source: United States Census Bureau, 2020 Decennial Census)

As of 2020, Honolulu had a population of about 1.02 million. The ethnic breakdown, based on U.S. Census categories were:

- Asian: 436,853
- White: 188,462
- Two or More Races: 248,686
- Native Hawaiian & Pacific Islander: 102,099
- Hispanic/Latino: 92,322
- Black/African American: 20,723
- American Indian & Alaska Native: 2,278
- Some Other Race: 17,407

Figure 2
Bus Route Summary*: Proportion of TVI/EJ Served Populations
(Title VI/EJ Routes Shaded)

Route (Service Area)	% TVI/EJ in Service Area	Route (Service Area)	% TVI/EJ in Service Area	Route (Service Area)	% TVI/EJ in Service Area	Route (Service Area)	% TVI/EJ in Service Area
1	12	54	6	99	17	532	1
1L	11	60	14	102	2	533	1
2	11	61	28	121	5	535	3
2L	11	65	2	122	4	541	2
3	5	66	4	151	13	542	1
4	3	67	6	200	3	544	0
5	2	69	12	234	0	545	0
6	4	80	3	301	23	551	5
7	16	81	22	302	23	552	7
8	2	82	4	303	20	651	2
9	11	83	11	306	47	671	0
9s	7	84	8	307	51	672	0
10	27	84A	8	401	48	673	0
11	8	85	16	402	39	674	0
13	11	86	17	403	46	A	6
14	2	87	3	411	11	C	27
123	3	88	17	413	16	E	9
18	1	88A	14	414	8	PH1	36
20	11	89	11	415	16	PH2	6
23	0	90	8	416	23	PH3	11
24	0	91	7	432	31	PH4	5
32	9	91A	9	433	25	PH6	10
40	25	92	11	444	26	PH7	7
41	9	93	27	461	13	PH8	21
42	14	94	12	501	1	W1	11
43	29	95	15	503	3	W2	16
44	8	96	10	504	0	W3	19
46	18	96A	12	511	32		
51	13	97	9	512	22		
52	16	98	9	521	0		
53	6	98A	8	531	0		

(Source: The Oahu Metropolitan Planning Organization Title VI and Environmental Justice Populations by Block Group, 2020.)

Figure 2 above displays the bus routes and the proportion of the service area (within a ½ mile radius of a bus route) designated as TVI/EJ. Of 120 routes*, 9 routes (highlighted) are identified as TVI/EJ and 111 routes as non TVI/EJ. Routes were identified as TVI/EJ routes based on a ½ mile radius that the route served. 29% is used as the minimum level for designating routes as TVI/EJ because it is the mean percentage of all TVI/EJ populations within a ½ mile radius among the routes.

*Includes routes that have been previously discontinued and modified within the years of 2022-2024, the years after the last completed Title VI program report was completed.

ROSTER OF BUS ROUTES from 2022-2025 **Effective 08/18/24**

Route No.	KALIHI DIVISION ROUTE NAME	Route No.	PEARL CITY DIVISION ROUTE NAME
PH4	Kailua-Kahaluu-Pearl Harbor	A	City Express! A
PH6	Hawaii Kai-Pearl Harbor	C	Country Express! C
PH8	Pearl Harbor-Aloha Stadium	E	Country Express! E
W3	Kalihi via School Street Express	PH1	Waianae Coast-Pearl Harbor
1	Kalihi-Kahala	PH2	Mililani Town-Pearl Harbor
1L	Halawa-Hawaii Kai	PH3	Wahiawa Heights-Pearl Harbor
2	School-Waikiki-Kahala	PH7	Ewa Beach-Pearl Harbor
2L	*Kalihi-Waikiki-Kahala Limited*	W2	Waipahu via Paiwa Express
3	Kaimuki-Salt Lake	20	Waikiki-Aloha Stadium
4	Nuuanu-Punahou-McCully	40	Honolulu-Makaha
5	Ala Moana-Manoa	41	Kapolei-Ewa Beach
6	Pauoa-Woodlawn	42	Ewa Beach-Waikiki
7	Kalihi Valley-Kahala	43	Waipahu-Waiawa
8	Makiki-Ala Moana-Waikiki	44	Waipahu-Ewa Beach
9	Kaimuki-Pearl Harbor	46	Kapolei Commons-UH West Oahu
9s*	Palolo Valley	51	Honolulu-Wahiawa
10	Kalihi-Alewa Heights	52	Honolulu-Mililani-Haleiwa
11	Makalapa-Halawa-Aiea Heights	53	Honolulu-Pacific Palisades
13	Liliha-Waikiki-University	84	Mililani Express-North
14	St. Louis-Maunalani	88	Kahaluu-Ahuimanu Express
18	University-Ala Moana	88A	North Shore Express
24	Kapahulu – Aina Haina	90	Pearl City Express
23	Kahala-Sea Life Park	92	Makakilo City Express
32	Kalihi Transit Center-Foster Village-Pearlridge	93	Waianae Coast Express-CBD
61	Kalihi-Kaneohe-Aikahi	95	Kapolei Homesteads Express
66	Downtown-Kailua-Aikahi	96	Waipio Gentry Express
67	Honolulu-Kailua-Waimanalo	99	Wahiawa-Mililani-Waipahu-Kapolei
69	Kaneohe-Waimanalo-Sea Life	401	Waianae Valley
80	Hawaii Kai Park & Ride Express	402	Lualualei Homestead
82	Hawaii Kai Park & Ride Express	403	Nanakuli-Maili-Waianae
83	Wahiawa Town Express	411	Makakilo Heights
84A	Mililani Express-South	413	Campbell Industrial Park
85	Windward Express-Kaneohe	414	Palahia-Makakilo-Kapolei
86	Windward Express-Haiku	415	Kapolei Transit Center-Kalaeloa
87	Windward Express-Kailua	416	Kapolei Circulator
89	Waimanalo-Kailua Express	432	East-West Waipahu
97	Village Park Express	433	Waipahu-Waikele Shopping Center
98	Wahiawa-Mililani Park & Ride	444*	Hoaeae-Village Park-Royal Kunia
98A	Wahiawa-Mililani Transit	461	Makakilo-Palahia-UH West Oahu
102	Makiki via Keeaumoku	501	Mililani Mauka
121	Nuuanu-Alapai Transit Center	503	Mililani-Launani Valley
122	Punchbowl-Alapai Transit Center	504	Mililani South
123	Papakolea-Pacific Heights	511	Wahiawa-Schofield
151	*Chinatown-Kuakini-Kauluwela*	512	Wahiawa-Whitmore
200	Kapiolani Park-Palolo Valley	521	Waialua-Haleiwa
234	Kahala Mall-Waialae Nui	531	Manana-Pearl Highlands
301	Tripler-Kalihi Transit Center	532	Momilani-Pearl Highlands
302	Moanalua Valley-Kalihi Transit Center	533	Pacific Palisades
303	Hickam-Aiport-Kalihi Transit Center	535	Pearl City Peninsula-Pearl Highlands
306	Kahauiki Village	541	Wailuna-Pearlridge
307	*Kamehameha IV Rd-Kalihi Transit Center*	542	Royal Summit-Newtown-Pearlridge

551	Aiea Heights-Aloha Stadium	544	Upper Pearlridge-Pearlridge
552	Halawa Heights-Aloha Stadium	545	Pali Momi-Koauka-Pearlridge
651	Puohala-Windward City		
671	Kailua-Lanikai		
672	Kailua-Maunawili		
673	Kailua-Enchanted Lake		
674	Kailua-Aikahi		
KALIHI AND PEARL CITY DIVISION			
W1	Waipahu via Farrington	91	Ewa Beach Express
54	Honolulu-Pearl City	91A*	Ewa Gentry Express
60	Honolulu-Kaneohe-Haleiwa	94	Villages of Kapolei Express
65	Honolulu-Kaneohe-Ahuimanu	96A*	Paiwa-Waikele Express
81	Waipahu Express		

Discontinued

* Renumbered and/or restructured: Rt 9s was restructured and renumbered to Rt 200; Rt 434 was renumbered to Rt 444; Rt 101 was renumbered to 91A; Rt 103 was renumbered to 96A.

Italic = Reinstated or new route

Section 13: Demographic Ridership and Travel Patterns

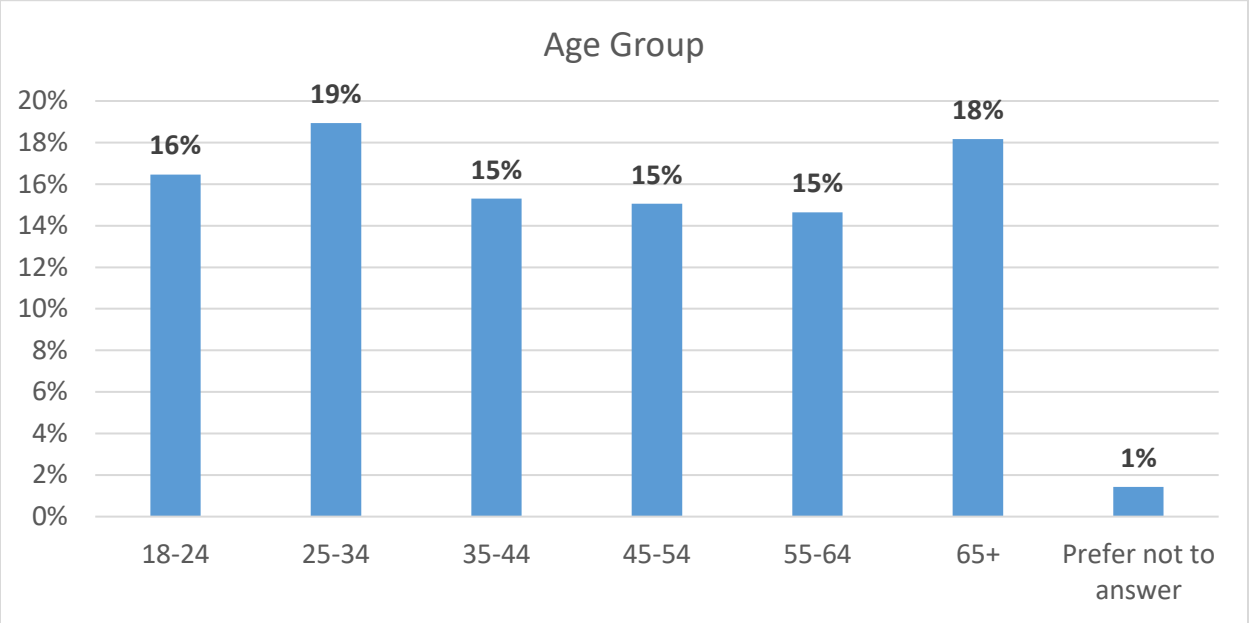
Fixed route providers shall collect information on the race, color, national origin, English proficiency, language spoken at home, household income and travel patterns of their riders using customer surveys. Transit providers shall use this information to develop a demographic profile comparing minority riders and non-minority riders, and trips taken by minority riders and non-minority riders. Demographic information shall also be collected on fare usage by fare type amongst minority users in low-income users, in order to assist with fare equity analyses.

The information in this section is collected from the Honolulu Transit Comprehensive Operations Analysis Task 1 On-Board Survey, Cambridge Systematics, conducted from August 2021 – January 2022 on TheBus.

Results can be seen in Figures 3 - 16.

- Figure 3: Age
- Figure 4: Gender
- Figure 5: Ethnicity
- Figure 6: Household Size
- Figure 7: Annual Household Income
- Figure 8: Employment Status
- Figure 9: Ability to Speak English
- Figure 10: Other Languages Spoken at Home
- Figure 11a: Trip Payment, Payment Method
- Figure 11b: Trip Payment, Fare Type
- Figure 11c: Trip Payment, Pass Type
- Figure 12: Trip Origin
- Figure 13: Trip Destination
- Figure 14: Available Alternative Vehicles
- Figure 15: Driver's License Status
- Figure 16: Resident Status

Figure 3: Age

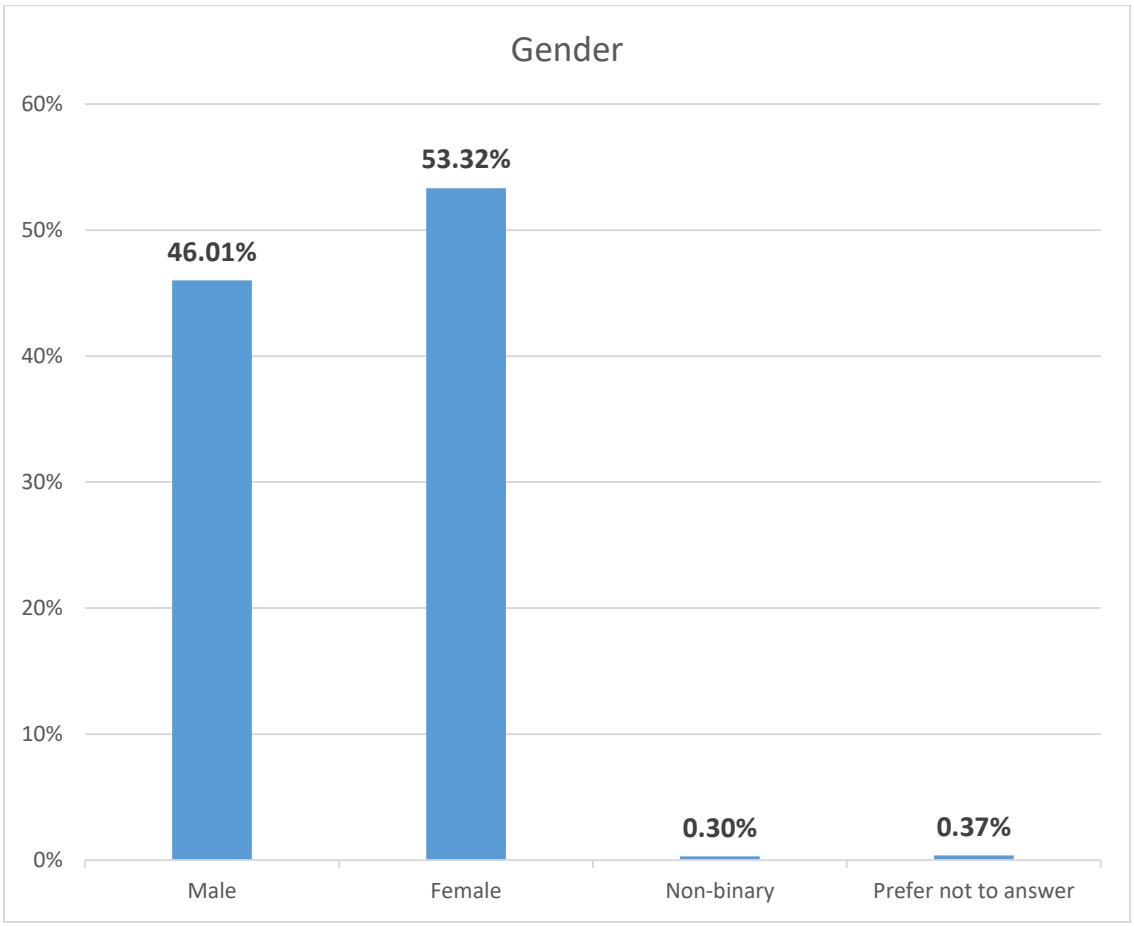


(Source: Honolulu Transit Comprehensive Operations Analysis Task 1 On-Board Survey, Cambridge Systematics, August, 2021)

Statistics for the range of age groups that use the bus are comparable, with the largest group being the 25-34 years old and tied for smallest age group are riders in the 35-44, 45-54, and 55-64 years old ranges.

- 19%: 25 - 34 years old
- 18%: 65+ years old
- 16%: 18 - 24 years old
- 15%: 35 – 44 years old
- 15%: 45 – 54 years old
- 15%: 55 – 64 years old
- 1%: Prefer not to answer

Figure 4: Gender

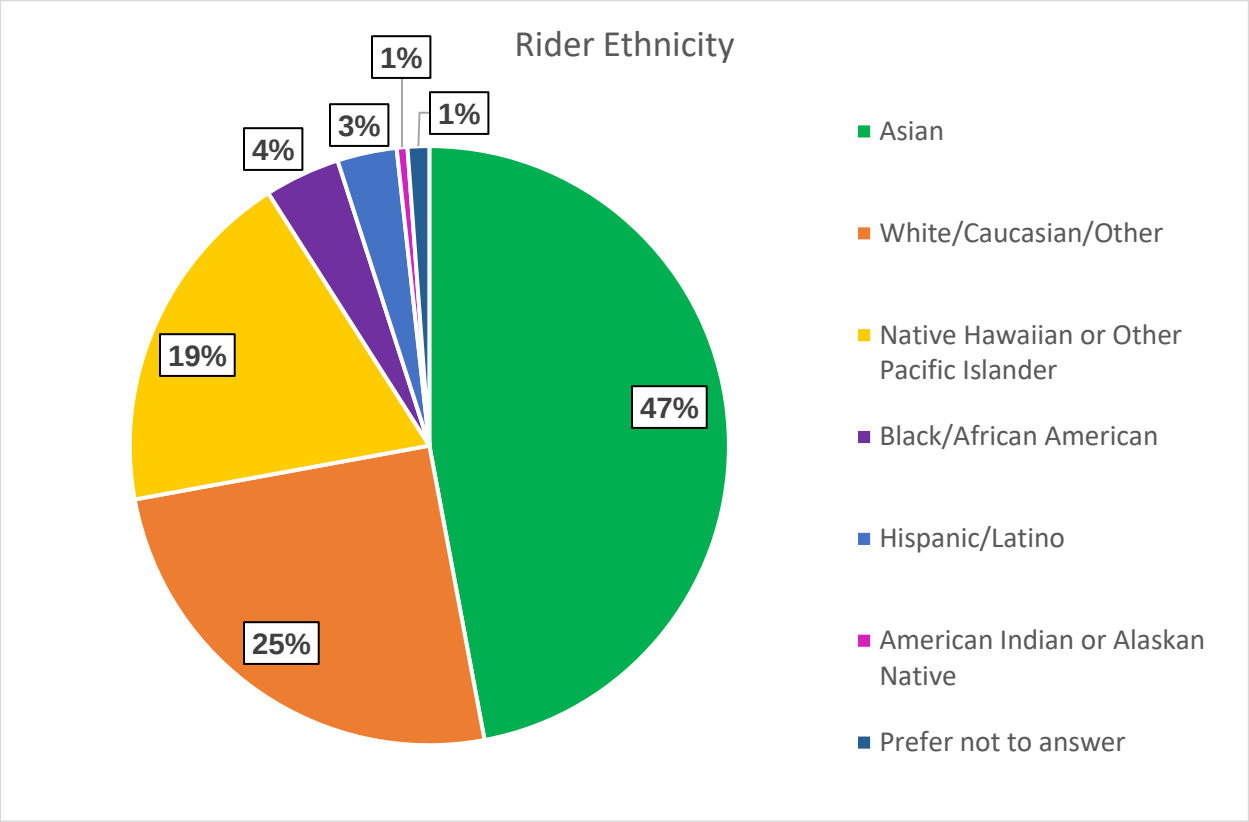


(Source: Honolulu Transit Comprehensive Operations Analysis Task 1 On-Board Survey, Cambridge Systematics, August, 2021)

Ridership is comparable between genders, with approximately 7% more females than males.

- Female: 53.32%
- Male: 46.01%
- Non-Binary: 0.30%
- Prefer not to answer: 0.37%

Figure 5: Ethnicity

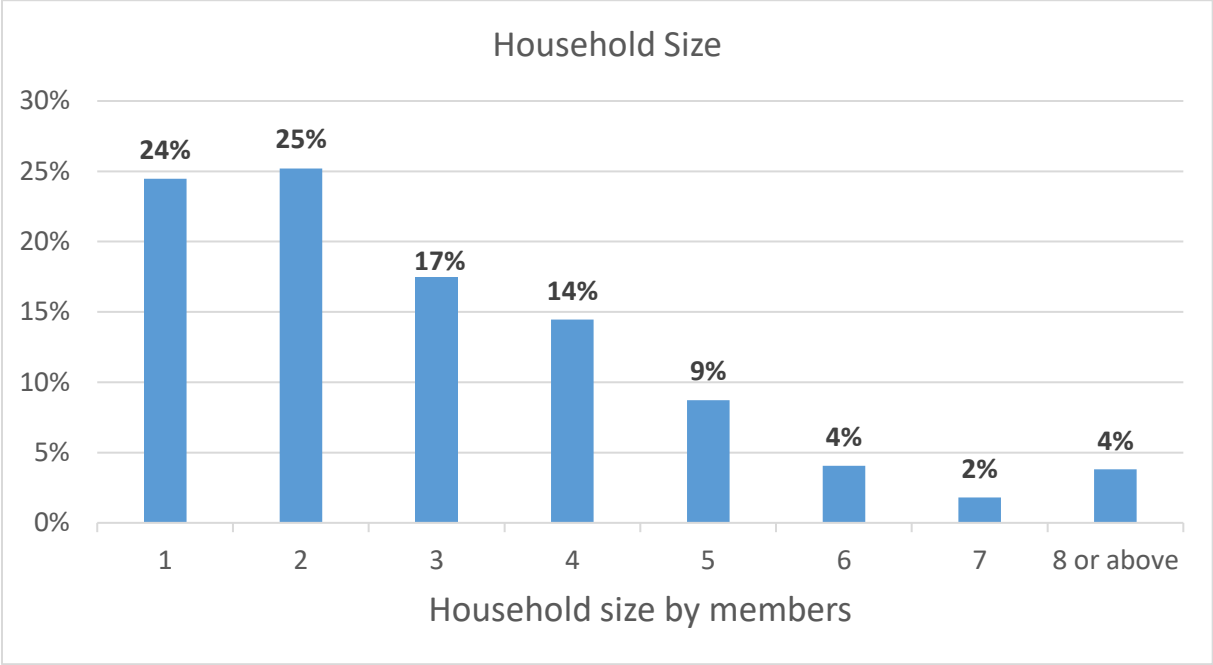


(Source: Honolulu Transit Comprehensive Operations Analysis Task 1 On-Board Survey, Cambridge Systematics, August, 2021)

There is a diversity of ethnicities in Honolulu. Among TheBus ridership, the three predominant groups are Asians, Caucasians, and Native Hawaiian/Other Pacific Islanders.

- 47%: Asian
- 25%: White/Caucasian/Other
- 19%: Native Hawaiian or Other Pacific Islander
- 4%: Black/African American
- 3%: Hispanic/Latino
- 1%: American Indian or Alaskan Native
- 1%: Prefer not to answer

Figure 6: Household Size

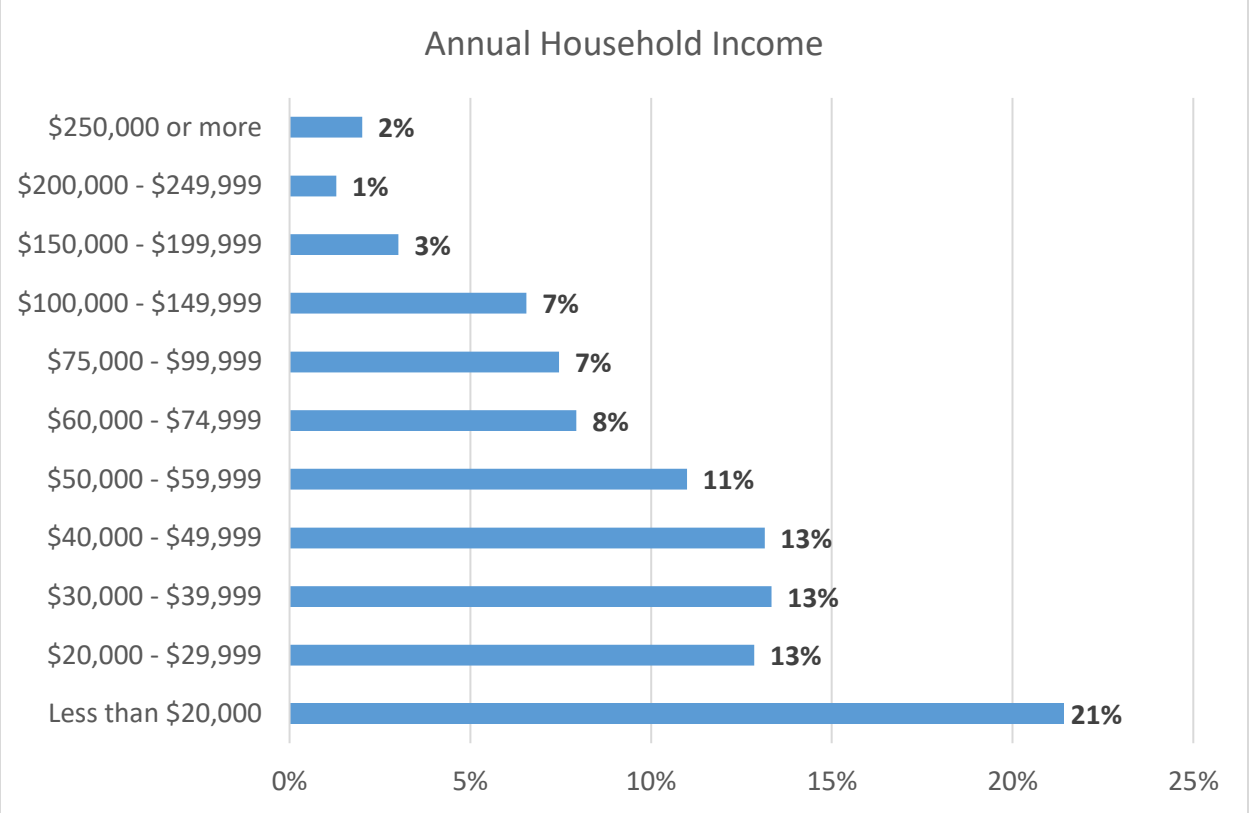


(Source: Honolulu Transit Comprehensive Operations Analysis Task 1 On-Board Survey, Cambridge Systematics, August, 2021)

The household size of most bus riders is comprised of one to two members.

- 25%: 2 household members
- 24%: 1 household member
- 17%: 3 household members
- 14%: 4 household members
- 9%: 5 household members
- 4%: 6 household members
- 4%: 8 or more household members
- 2%: 7 household members

Figure 7: Annual Household Income

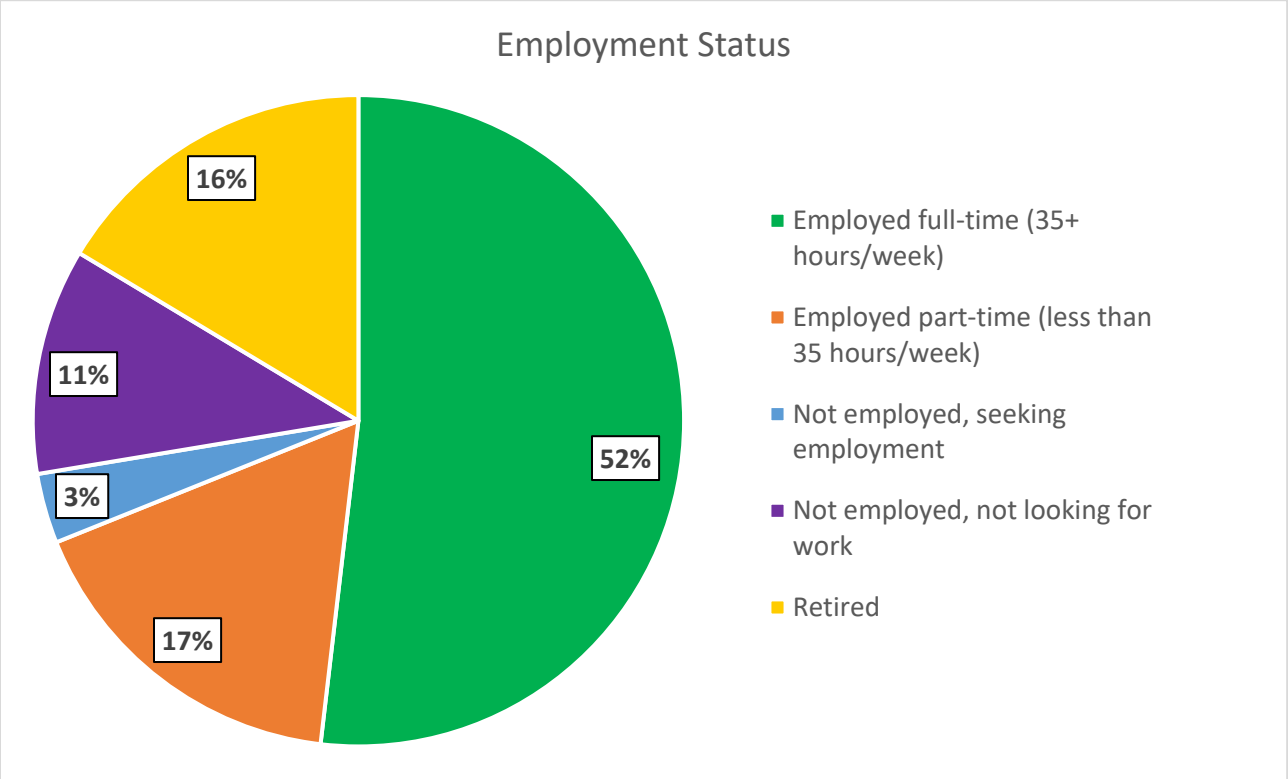


(Source: Honolulu Transit Comprehensive Operations Analysis Task 1 On-Board Survey, Cambridge Systematics, August, 2021)

71% of TheBus ridership has a household income of less than $60,000 with 21% making less than $20,000.

- 21%: Less than $20,000
- 13%: $20,000 - $29,999
- 13%: $30,000 - $39,999
- 13%: $40,000 - $49,999
- 11%: $50,000 - $59,999
- 8%: $60,000 - $74,999
- 7%: $75,000 - $99,999
- 7%: $100,000 - $149,999
- 3%: $150,000 - $199,999
- 2%: $250,000 or more
- 1%: $200,000 - $249,999

Figure 8: Employment Status

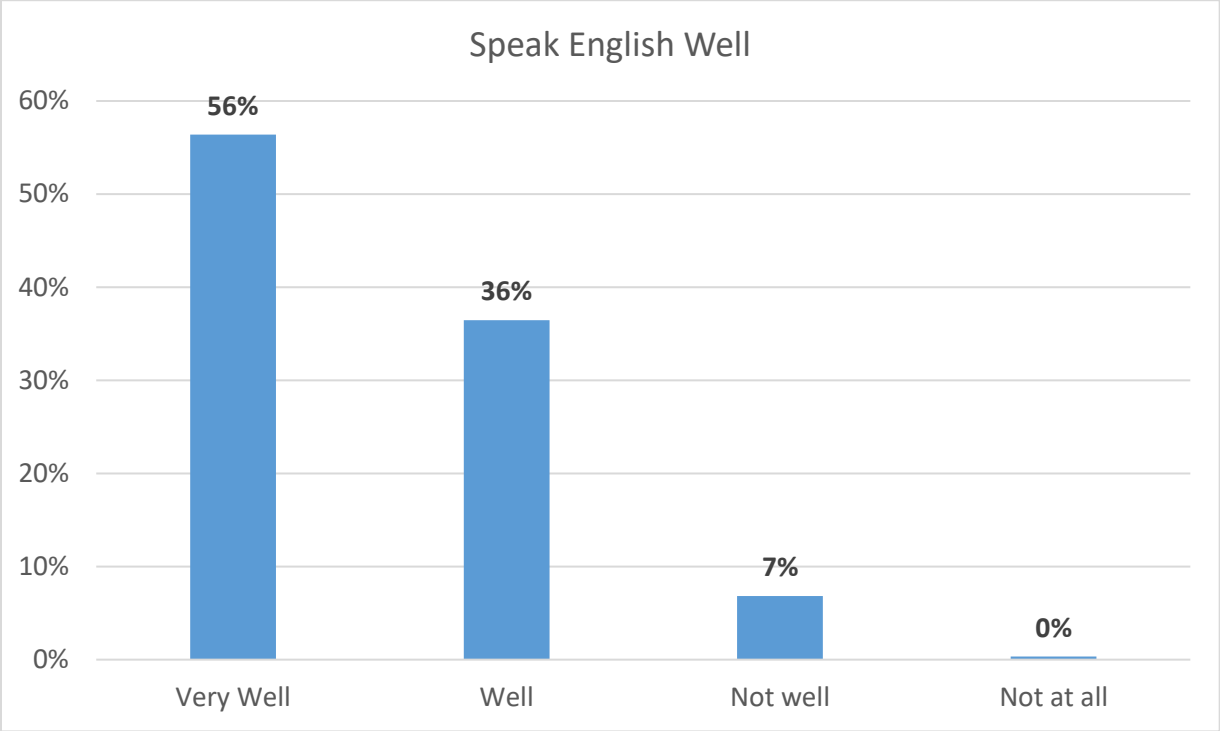


(Source: Honolulu Transit Comprehensive Operations Analysis Task 1 On-Board Survey, Cambridge Systematics, August, 2021)

Approximately half of TheBus ridership are employed full-time. Approximately one third of TheBus ridership are retired and employed part-time.

- 52%: Employed full-time (35+ hours/week)
- 17%: Employed part-time (less than 35 hours/week)
- 16%: Retired
- 11%: Not employed, not looking for work
- 3%: Not employed, seeking employment

Figure 9: Ability to Speak English

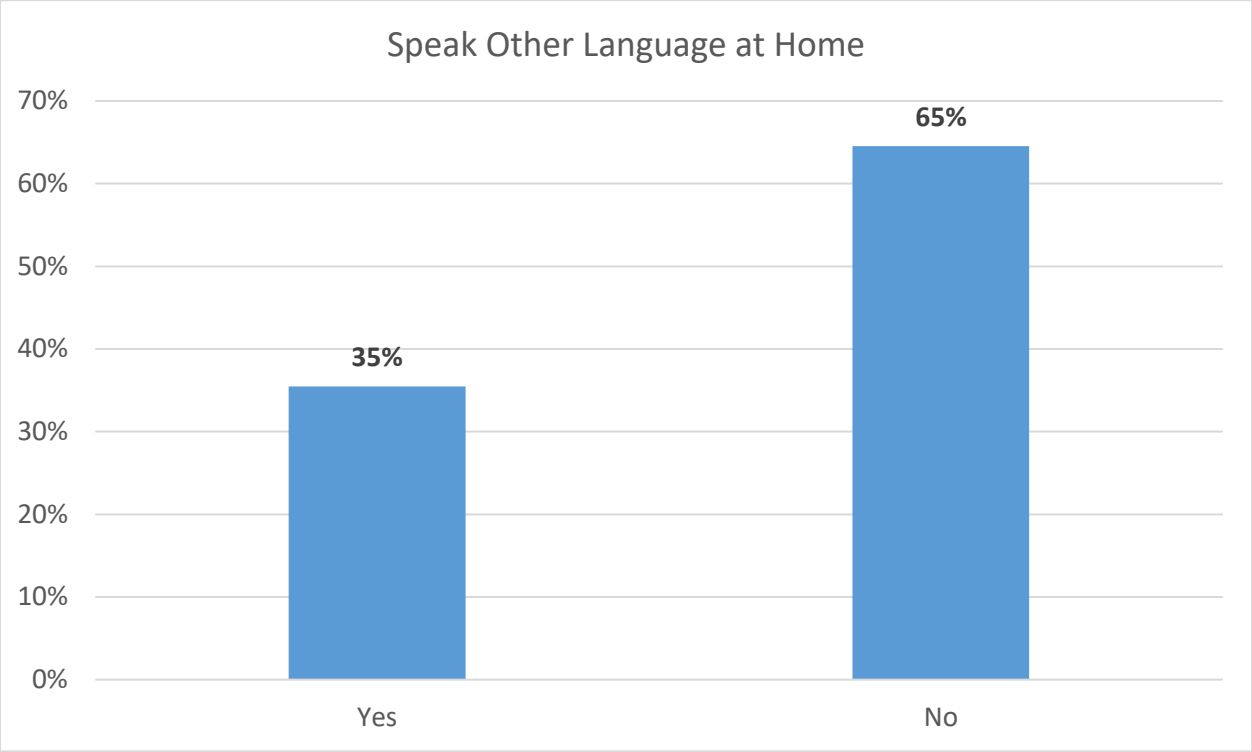


(Source: Honolulu Transit Comprehensive Operations Analysis Task 1 On-Board Survey, Cambridge Systematics, August, 2021)

Majority of bus riders speak English well.

- 56%: Very well
- 36%: Well
- 7%: Not well
- <1%: Not at all

Figure 10: Other Languages Spoken at Home

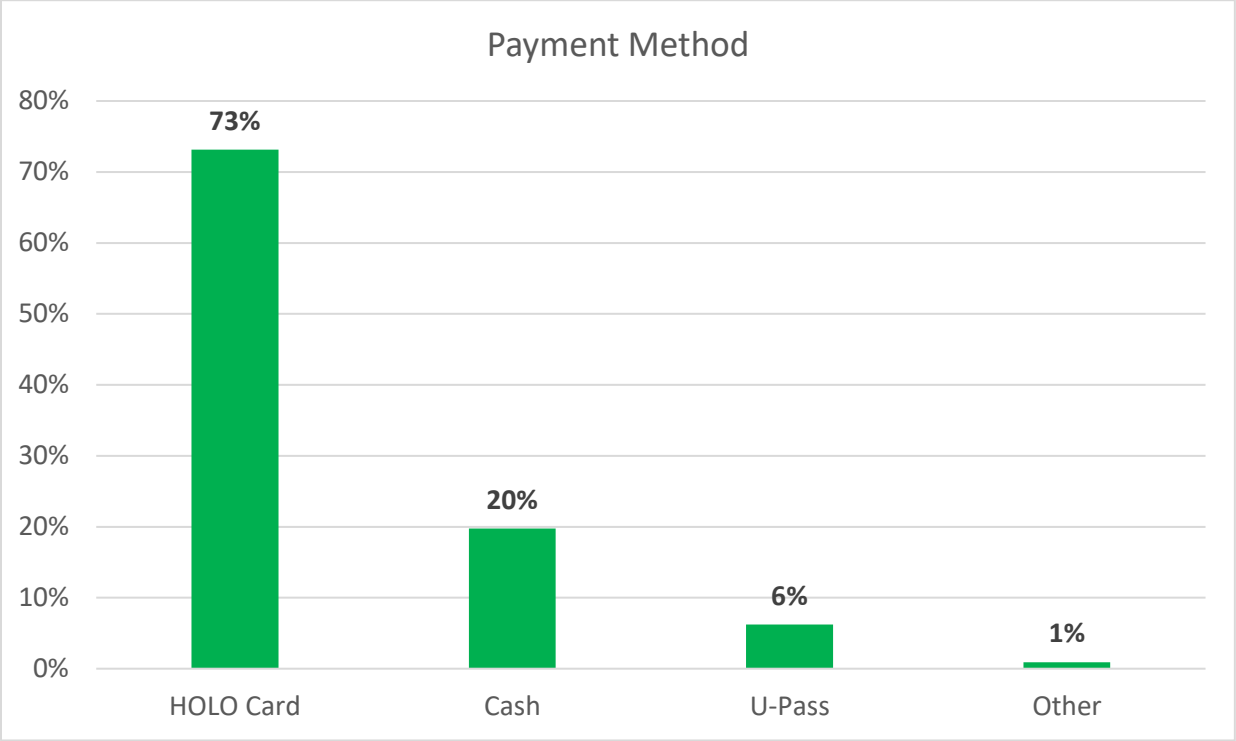


(Source: Honolulu Transit Comprehensive Operations Analysis Task 1 On-Board Survey, Cambridge Systematics, August, 2021)

Two thirds of TheBus ridership speak English at home.

- 65%: No
- 35%: Yes

Figure 11(a): Trip Payment, Payment Method

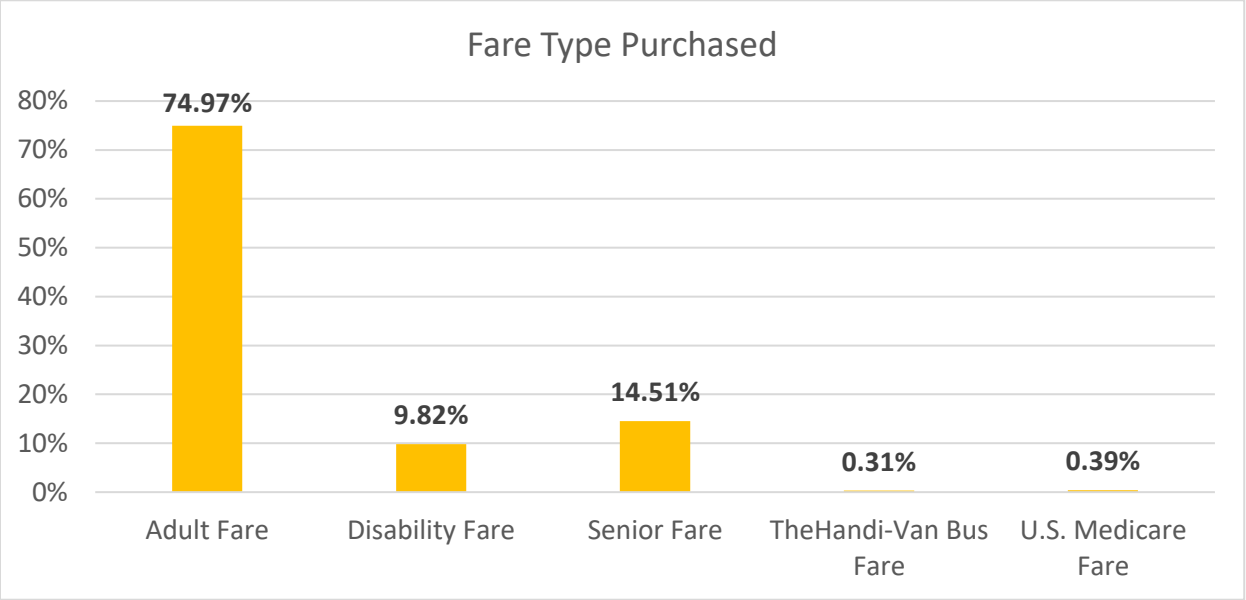


(Source: Honolulu Transit Comprehensive Operations Analysis Task 1 On-Board Survey, Cambridge Systematics, August, 2021)

The most frequently used method of payment is the HOLO card, and second is Cash at 20% of our ridership.

- 73%: HOLO Card
- 20%: Cash
- 6%: U-Pass
- 1%: Other

Figure 11(b): Trip Payment, Fare Type

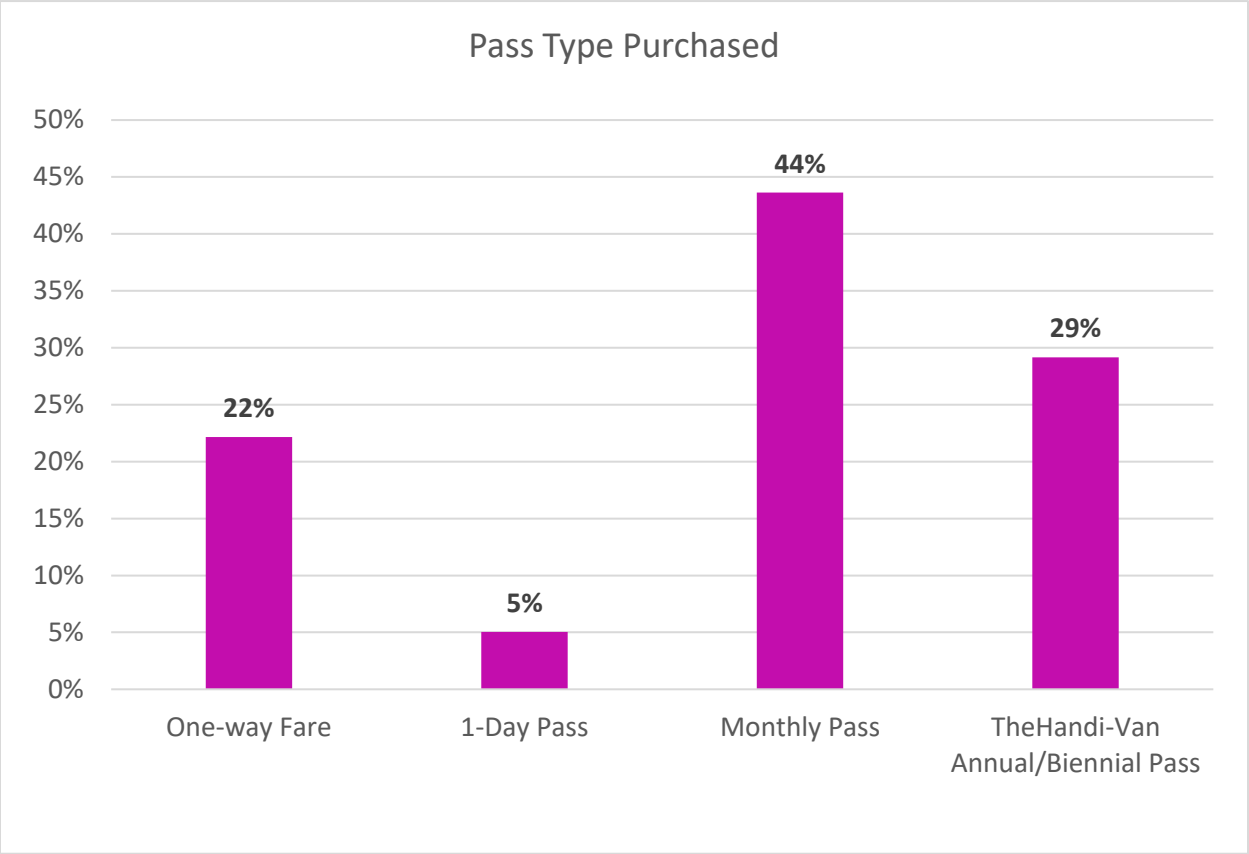


(Source: Honolulu Transit Comprehensive Operations Analysis Task 1 On-Board Survey, Cambridge Systematics, August, 2021)

Approximately 75% of TheBus riders purchase Adult Fares, whereas the second most purchased fare is the Senior Fare, amounting to 14% of TheBus ridership.

- 74.97%: Adult Fare
- 14.51%: Senior Fare
- 9.82%: Disability Fare
- 0.39%: U.S. Medicare Fare
- 0.31%: TheHandi-Van Bus Fare

Figure 11(c): Trip Payment, Pass Type

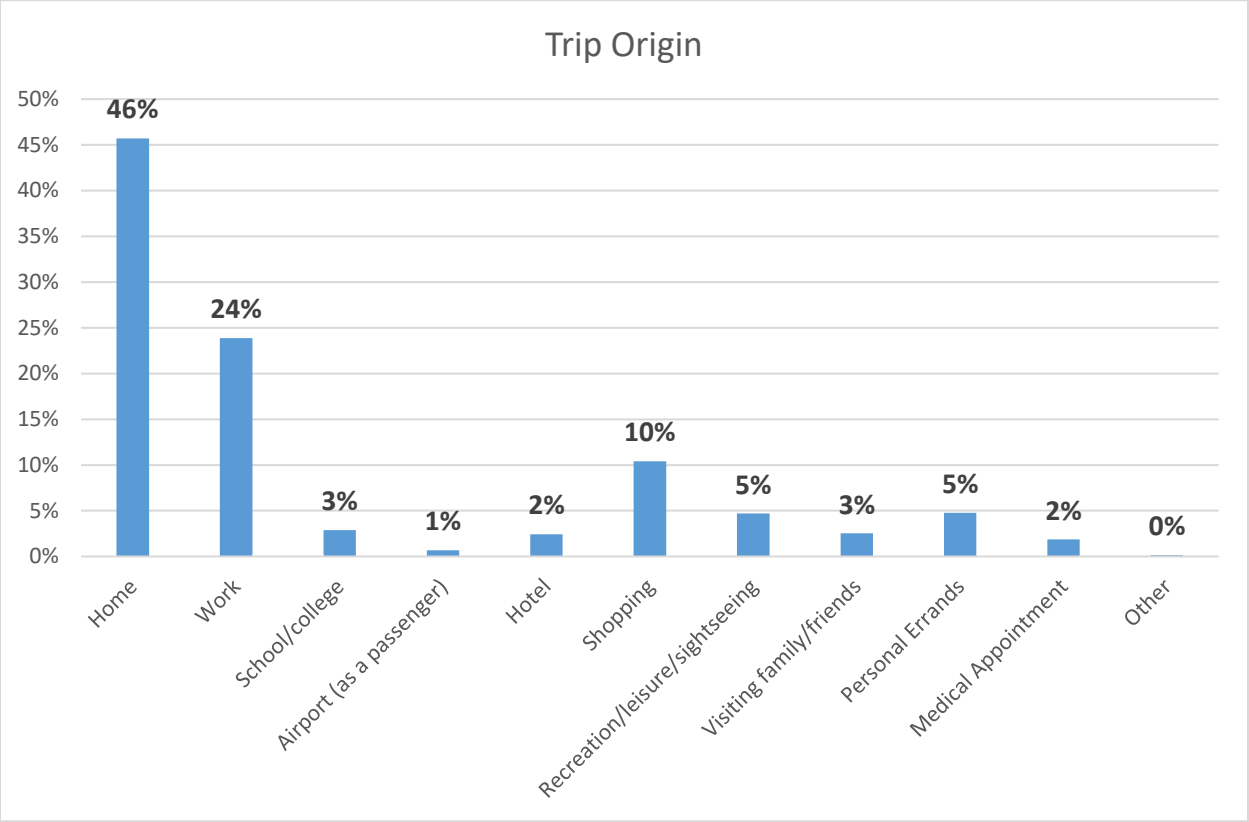


Source: Honolulu Transit Comprehensive Operations Analysis Task 1 On-Board Survey, Cambridge Systematics, August, 2021)

The most commonly purchased Pass Type is the Monthly Pass, and the least commonly purchased is the 1-Day Pass.

- 44%: Monthly Pass
- 29%: TheHandi-Van Annual/Biennial Pass
- 22%: One-way Fare
- 5%: 1-Day Pass

Figure 12: Trip Origin

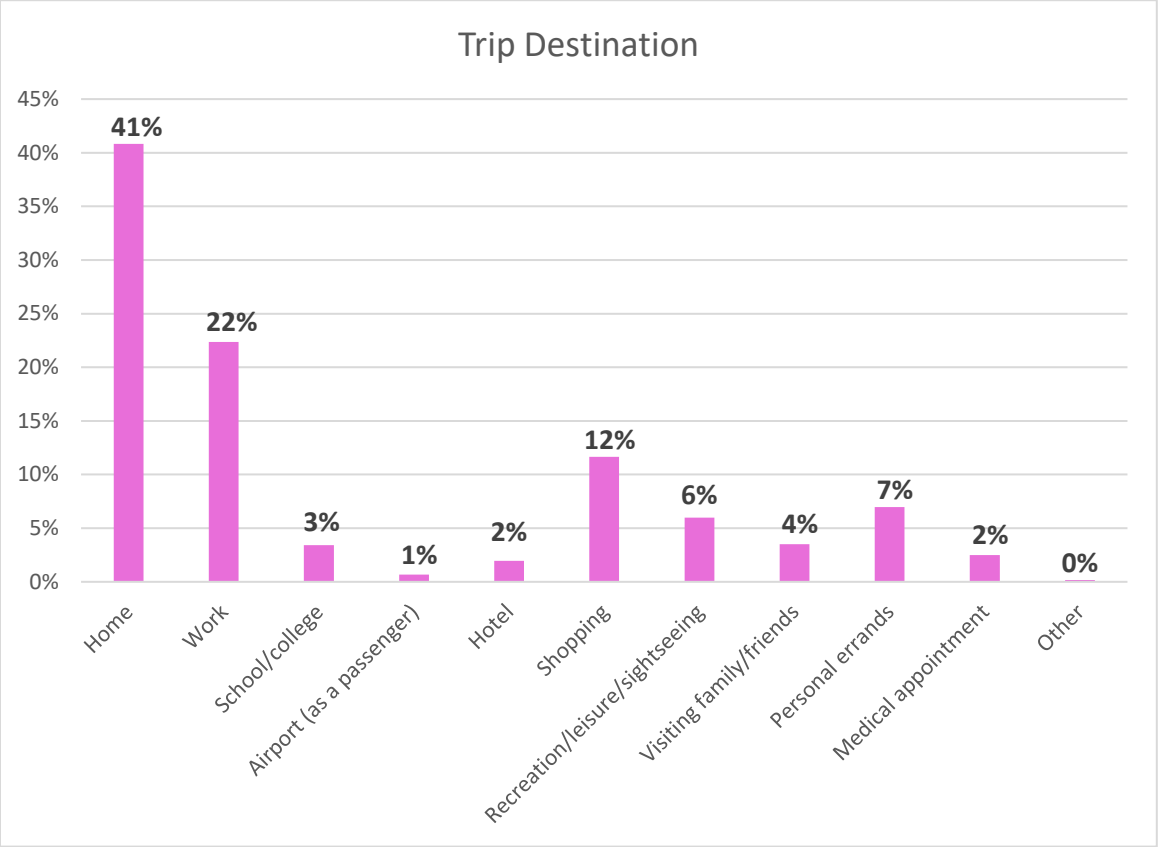


(Source: Honolulu Transit Comprehensive Operations Analysis Task 1 On-Board Survey, Cambridge Systematics, August, 2021)

Majority of those surveyed responded that they were catching the bus from home, the next largest group of riders were coming from work.

- 46%: Home
- 24%: Work
- 10%: Shopping
- 5%: Recreation/leisure/sightseeing
- 5%: Personal Errands
- 3%: School/college
- 3%: Visiting family/friends
- 2%: Hotel
- 2%: Medical Appointment
- 1%: Airport (as a passenger)
- <1%: Other

Figure 13: Purpose of Trip

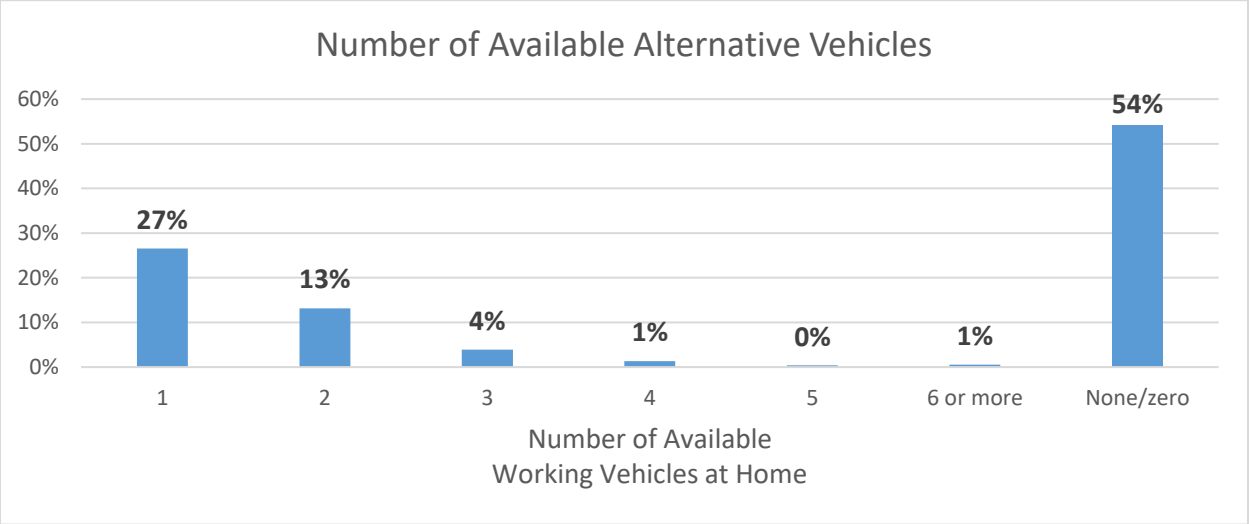


(Source: Honolulu Transit Comprehensive Operations Analysis Task 1 On-Board Survey, Cambridge Systematics, August, 2021)

Majority of TheBus riders utilize TheBus to travel between home and work.

- 41%: Home
- 22%: Work
- 12%: Shopping
- 7%: Personal errands
- 6%: Recreation/leisure/sightseeing
- 4%: Visiting family/friends
- 3%: School/college
- 2%: Hotel
- 2%: Medical apppointment
- 1%: Airport (as a passenger)
- <1%: Other

Figure 14: Available Alternative Vehicles

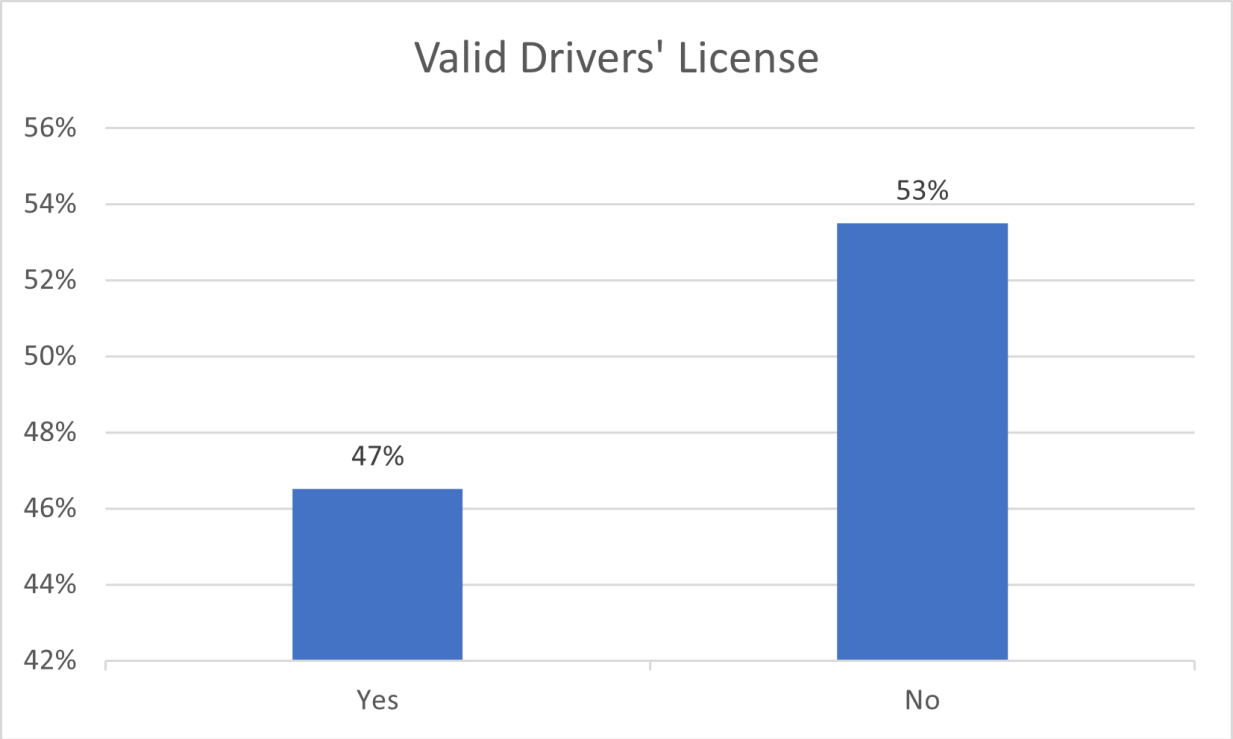


(Source: Honolulu Transit Comprehensive Operations Analysis Task 1 On-Board Survey, Cambridge Systematics, August, 2021)

Majority of TheBus riders do not have an available working vehicle at home, while 27% of TheBus ridership have 1 working vehicle available at home.

- 54%: None/Zero
- 27%: 1
- 13%: 2
- 4%: 3
- 1%: 4
- 1%: 6 or more
- 0%: 5

Figure 15: Driver's License Status

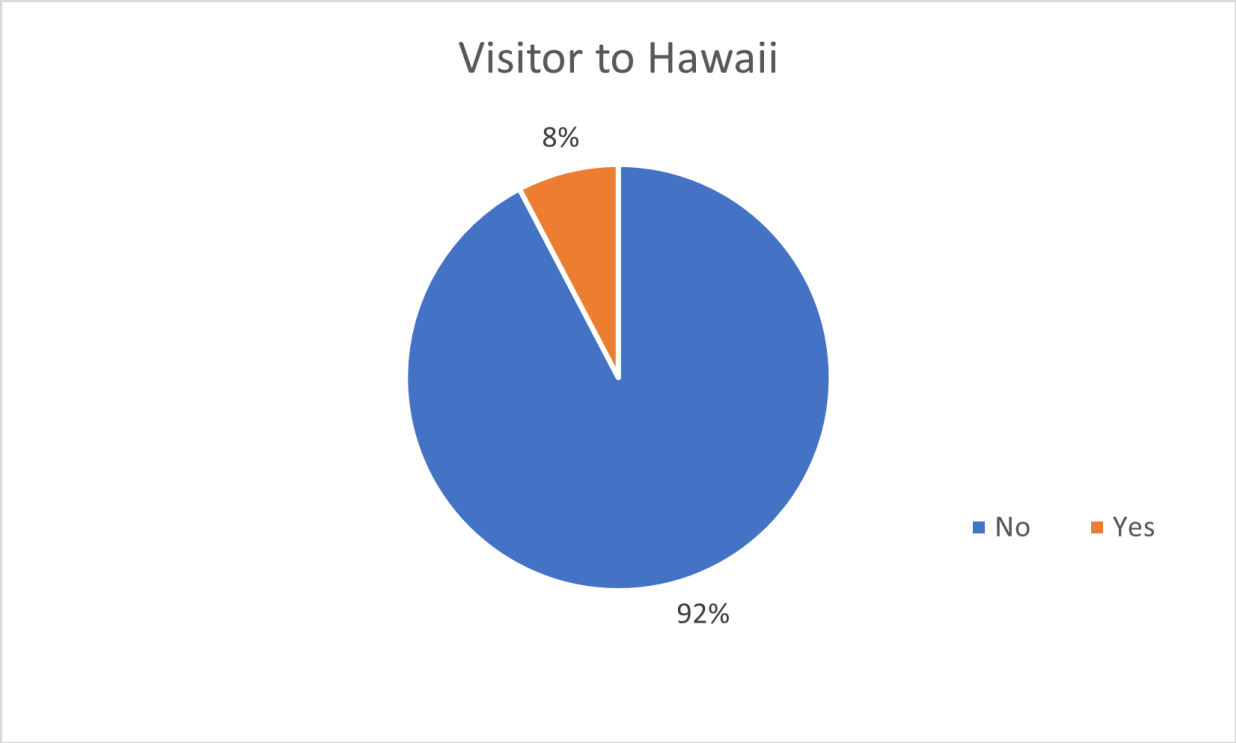


(Source: Honolulu Transit Comprehensive Operations Analysis Task 1 On-Board Survey, Cambridge Systematics, August, 2021)

53% of TheBus ridership does not have a valid drivers' license.

- Driver's License: 47%
- No Driver's License: 53%

Figure 16: Resident Status



(Source: Honolulu Transit Comprehensive Operations Analysis Task 1 On-Board Survey, Cambridge Systematics, August, 2021)

TheBus is mainly utilized by Hawaii residents with visitors making up only 8% of our ridership.

- Resident: 92%
- Visitor: 8%

Section 14: Requirement to Monitor Transit Service

In order to ensure compliance with DOT's Title VI regulations, FTA requires transit agencies to monitor the performance of their transit system relative to their system-wide service standards and service policies (i.e. vehicle load, vehicle assignment, transit amenities, etc.) no less than every three years. Agencies shall submit the results of the monitoring program as well as documentation (e.g., a resolution, copy of meeting minutes, or similar documentation) to verify the Board's consideration, awareness, and approval of the monitoring results to the FTA every three years as part of the Title VI Program.

The System-wide Service Standards & Policies Monitoring Report was compiled using 2024 data. (Please see Attachment 7 for full report and data)

Summary of Findings

The results of TheBus service performance for all 120 routes are summarized below. Nine (9) routes (highlighted) are identified as TVI/EJ and 111 routes as non TVI/EJ. Overall, public transit services are provided in a comparable/non-discriminatory manner to TVI/EJ and non TVI/EJ populations. Improving service performance for all routes is an ongoing work in progress.

Although the results identified schedule adherence as a major concern, it is a system-wide issue for a majority of the routes and does not disproportionately affect TVI/EJ routes. Routes that do not meet the service standards and policies identified in this report are monitored/evaluated for further analysis to redistribute/adjust service and/or implement other mitigation measures that align with current service levels and budget constraints.

System-wide Service Standards:

- Vehicle Load: OTS has a variety of vehicles with different loads and capacities. Although post-pandemic ridership levels are about 65% of its pre-pandemic levels, there are routes that experience heavier levels of overcrowding because of ridership demands.

- Vehicle Headway: After the pandemic's impact on ridership levels, revenue, and resource/budget allocations, there have been efforts to adjust affected scheduled headways for all service modes, and depending on the route's profile/service area/ridership levels, headways for routes in the same service mode category can vary. Therefore, the scheduled headway standard is expressed as a range and the headways for the majority of routes fall within the established range. Routes with non-conforming scheduled headways are evaluated and adjusted to the maximum extent feasible. Alignment with the headway standard is affected by ridership and budget constraints.

- On-time performance: The majority of routes do not meet the on-time performance standard of 80% for all their scheduled time periods, except for six Peak Express routes, ten Circulator Routes, and one Rapid Bus. Out of the nine Title VI routes, only three met the on-time performance standard. Besides road/lane closures/detours and rail construction along a major bus corridor, other external/operating factors that contribute to service delays include traffic accidents and passenger issues such as fare, mask, non-service animal enforcement. Non-performing routes are monitored/evaluated to identify factors affecting on-time performance for mitigation purposes, such as insufficient running times or long-term construction projects.

- Service availability: The standard that a bus route is within a ½ mile radius for 80% of the population was met for TVI/EJ (99%) and non-TVI/EJ (99.8%) populations.

Service Policies:

- Transit amenities: Overall, the distribution of transit amenities are comparable between the TVI/EJ and non-TVI/EJ routes considering how few TVI/EJ routes there are:

  33% of bus stops along TVI/EJ routes have shelters.
  42% of bus stops along non-TVI/EJ routes have shelters.
  62% of bus stops along TVI/EJ routes have benches.
  66% of bus stops along non-TVI/EJ routes have benches.
  35% of bus stops along TVI/EJ routes have trash containers.
  44% of bus stops along non-TVI/EJ routes have trash containers.

- Vehicle assignment: Overall, vehicle assignment for TVI/EJ and non TVI/EJ routes are comparable.

Average fleet age:	11.78 years
Average TVI/EJ age:	11.07 years
Average non TVI/EJ age:	11.92 years

Section 15: Requirement to Evaluate Service and Fare Changes

In order to ensure compliance with DOT's Title VI regulations, FTA requires transit agencies to develop written procedures to evaluate, prior to implementation, any and all service changes that exceed the transit provider's major service change threshold, as well as all fare changes, to determine whether those changes will have a discriminatory impact based on race, color, or national origin. The written procedures and results of service and/or fare equity analyses shall be included in the transit provider's Title VI Program as well as documentation (e.g., a resolution, copy of meeting minutes, or similar documentation) to verify the Board's consideration, awareness, and approval of the analysis results to the FTA every three years as part of the Title VI Program.

DTS-TMD's Major Service and Fare Change Policy can be found at attachment 8. DTS' service equity analyses are contained in Attachment 9.

Post-June 2022

- Route U1 New Route (2022) and Route U1 Elimination (2023)
- Route 416 Reroute (2022)
- 2022 July Fare increase

2023

- 2023 Low Income Fare Program Change
- Route E Reroute
- Route 52 Reroute
- Route 2/2L Restructure
- Route 121 Elimination and Route 151 New Route
- Route 122 Segment Elimination
- Route 416 Segment Elimination and Reroute (2023)
- Route 434 Renumber and Restructure
- Route 433 Reroute
- BRIP routes:
    - Route C Restructure
    - Route 46 New Route
    - Route 461 New Route
    - Route 44 Restructure
    - Route 53 weekends only, replaced by New Route 533
    - Route 73 Elimination and replaced by New Routes 531, 532, 535
    - Route 71 replaced by New Routes 542, 544, 541, 545
    - Route A Restructure
    - Route 1L Restructure
    - Route 20 Restructure
    - Route 74 Elimination and replaced by New Routes 551, 552
    - Route PH8 New Route

2024

- Route 9 Elimination / Route 7 Restructure / Route 307 New Route
- Route 9s Restructure/ Route 20 Segment Elimination / Route 200 New Route
- Route 10 / Route 41 / Route123 Service Reduction
- Route 1L Reroute
- Route 11 Elimination
- Route 43 Restructure and Route 432 Elimination
- Route 303 Segment Elimination
- Route 18 Elimination
- Route 24 Elimination
- Route 23 Segment Elimination and Route Extension

2025

- Route 41 / Route 44 / Route 415 / Route 461 Restructure and Route 47 New Route
- 2025 July Fare increase

Attachment 1

Complaint Form

DEPARTMENT OF TRANSPORTATION SERVICES
KA ʻOIHANA LAWELAWE ʻŌHUA
CITY AND COUNTY OF HONOLULU
711 KAPIʻOLANI BOULEVARD, SUITE 1600
HONOLULU, HAWAIʻI 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

COMPLAINT FORM

Information/Instruction

The City and County of Honolulu, Department of Transportation Services, and Oahu Transit Services are committed to ensuring that no person is discriminated against while using TheBus or TheHandi-Van services as prohibited by **Title VI, Civil Rights Act, 1964**. "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."

Please provide the following information necessary in order to process your complaint. Assistance is available upon request, TheBus (808) 768-8368 and TheHandi-Van (808) 768-8300. Complete this form and mail or deliver to: City and County of Honolulu, Department of Transportation Services, Transportation Mobility Division, 711 Kapiʻolani Boulevard, Suite 1600, Honolulu, HI 96813.

Section I

Name of Complainant: _____

Address: _____

Telephone (Home): _____ Telephone (Work): _____

Electronic Mail Address: _____

Accessible Format Requirements?

☐ Large Print ☐ Audio Tape ☐ TDD Other: _____

Section II

Are you filing this complaint on your own behalf? ☐ Yes ☐ No

If you answered "yes" to this question, go to **Section III**.

If not, please supply your name and relationship to the person for whom you are complaining: _____

Please explain why you have filed for a third party: _____

_____

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. ☐ Yes ☐ No

Section III

I believe the discrimination I experienced was based on (check all that apply):

☐ Race ☐ Color ☐ National Origin

Date of Alleged Discrimination (Month, Day, Year): _____

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use additional sheets. _____

_____

_____

_____

Section IV

Have you previously filed a complaint with this agency? ☐ Yes ☐ No

Section V

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? ☐ Yes ☐ No

If yes, check all that apply and list names:

☐ Federal Agency: _____ ☐ State Agency: _____
☐ Federal Court: _____ ☐ Local Agency: _____
☐ State Court: _____

Please provide information about a contact person at the agency/court where the complaint was filed.

Name: _____

Title: _____ Telephone: _____

Agency: _____

Address: _____

Section VI

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

Attachment 2

Public Participation Plan
and
Public Outreach Activities List

CHAPTER: Transportation Mobility Division	INDEX CODE: 7-1.19
CATEGORY: Administration	PAGE 1 of 5
SUBJECT: Public Participation for Changes in Public Transit Policies, Programs, Projects, Service, and Operations	Amendment: 2 Approved by: DTS Director Wes Frysztacki
REFERENCES: FTA C 4702.IB, Title VI Requirements & Guidelines for Federal Transit Administration (FTA) Recipients (or current version); Comprehensive Review Guide for Triennial and State Management Reviews (current FY)	Effective/Approval Date: April 2, 2019

PURPOSE

To establish policies and procedures when planning and implementing changes in public transit policies, programs, projects, plans, services and operations (collectively referred to as "Changes"); and to identify methods for early, inclusive, and continuous public participation when informing the public of proposed plans or advising the public of implementation of proposed "Changes". Public participation policies and engagement activities are applicable to all subrecipients, contractors, and lessees.

POLICIES

TMD shall:

1. Effectively engage all stakeholders, including but not limited to minority, low income, limited English proficient (LEP), and disabled populations, in public participation activities.

2. Ensure that public information and participation are provided as early as may be feasible and in a nondiscriminatory manner.

3. Promote full and fair participation in the public transit decision-making process for all potentially affected communities without regard to race, color or national origin.

4. Ensure meaningful access to public transit-related programs, plans, activities, and information by minority, low income, LEP, and disabled populations.

5. Evaluate and determine the most effective method(s) for informing and involving the public during the planning/decision-making process and implementation phase.

DEFINITIONS

For the purposes of this section:

1. "Changes" include but are not limited to the following:
    a. Policies affecting service, operations, programs.

b. Service levels affecting headway, frequency, availability, coverage area, hours, miles, span of service, hours of operation.
c. Fare policy, pricing, and media.
d. Service additions, extensions, or removals whether temporary or not.
e. Establishing, relocating, or removing bus stops.
f. Programs, plans, or projects affecting communities or ridership.

2. TMD will evaluate and designate "Changes" as major or minor. Major changes will generally affect system-wide/regional populations and significantly impact service usage by the established ridership in a large service area, and includes major service changes defined in Standard Operating Procedure No. 7-1.13 "DTS Major Service & Fare Change Policy and Disparate Impact & Disproportionate Burden Policies" (Amendment 2). Minor changes will generally affect operations or service over a smaller, specific area, community, or neighborhood, and have minimal impact to service usage by the established ridership.

3. Fixed Route ridership is defined as unlinked passenger trips and Paratransit ridership is defined as "active paratransit riders" who are currently eligible to use the City's special transit service, TheHandi-Van, and who have taken at least two (2) one-way trips in the past two (2) years.

4. Suspended, altered, or special services instituted during emergency situations shall be exempt from these procedures.

PROCEDURES

1. Public Information and Solicitation of Public Comment

During the planning phase, the public/ridership shall be informed of proposed major changes and their feedback and comments shall be solicited using the following method(s). The public comment period shall continue for sixty (60) days or more, as appropriate and feasible.

a. Neighborhood Boards

Neighborhood Boards, the City's mechanism to ensure and involve public participation in the decision-making process of government that affects communities, will be notified of proposals affecting their neighborhoods.

i. During the planning phase, information of proposed major changes will be transmitted to the Neighborhood Board Chair, fifteen (15) days or more, prior to the scheduled monthly meeting date and prior to the start of the public comment period, as appropriate and feasible.
ii. Presentations will be made upon request by the Neighborhood Board Chair.
iii. Information transmitted to the Neighborhood Board Chair will include the Mayor's Neighborhood Board Representative.
iv. Brochures, flyers, pamphlets, or other handouts will be provided to the Mayor's Neighborhood Board Representative for distribution at Neighborhood Board meetings.

b. Public Information Meetings

Public information meetings are another method to inform the public and solicit comments for inclusive public participation of proposed major changes, as appropriate and feasible.

i. The ridership (fixed route or paratransit) and/or the public will be notified of the public information meeting, fifteen (15) days or more, prior to the scheduled meeting date and start of the public comment period.
ii. Public information meetings may be scheduled for minor changes, as appropriate and feasible.

c. Public Hearing
During the planning phase, as appropriate and feasible, a public hearing may be convened when considering proposed major changes involving a large service area(s) or a comprehensive/complex issue(s). All public hearings shall be conducted in accordance with Hawaii Revised Statutes, Chapter 91, including:
i. Publishing public notices in a publication of general circulation, thirty (30) days or more, prior to the public hearing and start of the public comment period, that describe the proposed major changes, and the time and place of the public hearing.
ii. Have copies of the published notice and minutes of the public hearing available for public inspection.

d. Community/Business Organizations
Upon request during the planning phase, TMD will make informational presentations regarding proposed major changes to affected community/business organizations, either separately or in conjunction with presentations at Neighborhood Boards or at public information meetings, as appropriate and feasible.

e. Community Events
Upon request during the planning phase, TMD will participate in existing community events and be present to provide informational material, answer questions, and solicit comments regarding proposed major changes. Informational materials may include fliers, brochures, and surveys containing maps, charts, illustrations, photographs, table-top displays, and other graphics, as appropriate and feasible.

f. Public Transit Ridership (fixed route or paratransit)
During the planning phase:
i. Information to inform and solicit feedback for proposed major changes from the affected ridership will be posted at transit facilities, bus stops, on-board transit vehicles through mail-outs, and on DTS/OTS websites, as appropriate and feasible, prior to the start of the public comment period.
ii. For in-person communication to inform and solicit feedback for proposed major changes from the affected ridership, TMD will distribute informational material/surveys at transit facilities, major bus stops, and on-board transit vehicles, as appropriate and feasible, prior to the start of the public comment period.
iii. This section may apply to proposed minor changes, as appropriate and feasible.

g. Surveys
Surveys will be conducted during the planning phase for proposed major changes and may be conducted for proposed minor changes. Survey methods include but are not limited to:
i. Survey Monkey conducted online.
ii. Printed or verbal survey conducted in-person or distributed at transit facilities, bus stops, and on-board transit vehicles.
iii. Printed survey distributed at meetings and through the mail.

iv. All surveys will include a designated survey phone line.

2. Advance Notification for Implementation of Changes

Advance notification for implementation of major changes proposed in the planning phase and other changes to service or operations that impact the established ridership and its habits/usage of public transit includes, but is not limited to the following methods, with a goal of as much advance notice as practical.

The content of all notices will include relevant information, such as description of changes, dates, maps, other graphics, and contact information for public comment and inquiry (phone number and email/office address).

a. Neighborhood Boards
Notice will be provided to affected Neighborhood Boards, fifteen (15) days or more, prior to the implementation date and the scheduled monthly meeting, as appropriate and feasible.
   i. Presentations will be made upon request by the Neighborhood Board Chair.
   ii. Information transmitted to the Neighborhood Board Chair will also be provided to the Mayor's Neighborhood Board Representative.
   iii. Rider alerts or other handouts will be provided to the Mayor's Neighborhood Board Representative for distribution at Neighborhood Board meetings.

b. City Council
Notice will be provided to Councilmembers representing the affected City Council District, fifteen (15) days or more, prior to the implementation date, as appropriate and feasible.

c. Posted Notices, Car Cards
Notices will be posted at relevant locations; such as transit facilities, bus stops, on-board transit vehicles; fifteen (15) days or more, prior to the implementation date, as appropriate and feasible.

d. Fliers, Pamphlets. Brochures
Notices will be distributed, fifteen (15) days or more, prior to the implementation date, as appropriate and feasible.
   i. Distribution on-board transit vehicles.
   ii. Distribution at transit facilities, bus stops.
   iii. Mailings to ridership, residents, businesses, organizations, agencies.

e. Website Notice
Notices will be posted on the OTS and DTS websites, fifteen (15) days or more, prior to the implementation date, as appropriate and feasible.

f. Press Release
For media release to the public via newspaper, radio, and television; one (1) day or more, prior to the implementation date, as appropriate and feasible.

g. Purchased Advertising

Notice will be published in a publication of general circulation and/or publications targeted to specific areas, organizations, or groups, seven (7) days or more, prior to the implementation date, as appropriate and feasible.

3. Engaging Minority, Low-income, LEP, and Disabled Populations

Staff shall engage and consider the needs and input of minority, low income, LEP, and disabled populations (MLLD) by providing opportunities for meaningful participation, regardless of race, color or national origin, disabilities, or language barriers. Practices will include, but not limited to the following:

a. Provide reasonable or special accommodations based on the need, as appropriate and feasible, for example, interpreters or screen reader format for persons with low vision.
b. Conduct meetings at varied times of day and locations that are convenient and accessible to encourage participation.
c. Train staff to be alert to and anticipate the needs of LEP participants at meetings and workshops.
d. Make available different meeting sizes and formats upon request.
e. Network/coordinate with community-based organizations, social service agencies, and other community groups to specifically reach out to MLLD members and distribute information.
f. Have vital documents translated in identified languages and available on request.
g. Include information on meeting notices on how to request special assistance.

4. Record of Public Participation for Proposed Changes

Documentation of public participation and a record of solicited comments, include but are not limited to the following:

a. Correspondence (i.e. letters, email)
b. Meeting agendas and minutes (i.e. Neighborhood Board, Community Association)
c. Public Hearing meeting minutes
d. Telephone call log
e. Memos for the file (Walk-in, telephone)

Public Outreach Activities List

2022 to February 2025

Acronyms:

CM:	Council Member
HDOT:	Hawaii Department of Transportation
NB:	Neighborhood Board
BRIP:	Bus-Rail Integration Plan
UHM:	University of Hawaii Manoa

ROUTE/STOP	2022 CHANGES	PUBLIC OUTREACH
Rt 2L	Reinstated Rt 2L and extended routing	Notification to CM Waters, CM Fukunaga, CM Say, CM Cordero
		Notification to Waialae-Kahala NB 3, Kaimuki NB 4, Diamond Head-Kapahulu-St Louis NB 5, McCully-Moiliili NB 8, Waikiki NB 9, Maikiki-Tantalus NB 10, Ala Moana-Kakaako NB 11, Downtown-Chinatown NB 13, Liliha-Puunui-Alewa NB 14, Kalihi-Palama NB 15, Kalihi Valley NB 16, Aliamanu-Salt Lake NB 18
		Riders Alerts posted at affected bus stops
		Notice on TheBus website
Rt 306	Implemented Rt 306 (pilot)	Notification to CM Waters, CM Fukunaga, CM Say, and CM Cordero
		Notification to Waialae-Kahala NB 3, Kaimuki NB 4, Diamond Head-Kapahulu-St Louis NB 5, McCully-Moiliili NB 8, Waikiki NB 9, Maikiki-Tantalus NB 10, Ala Moana-Kakaako NB 11, Downtown-Chinatown NB 13, Liliha-Puunui-Alewa NB 14, Kalihi-Palama NB 15, Kalihi Valley NB 16, Aliamanu-Salt Lake NB 18
		Riders Alerts posted at affected bus stops
		Notice on TheBus website
Rt E	Re-routed Rt E	Notification to CM Waters, CM Elefante, CM Fukunaga, CM Say, and CM Tulba
		Notification to Diamond Head-Kapahulu-St Louis NB 5, Waikiki NB 9, Ala Moana-Kakaako NB 11, Downtown-Chinatown NB 13, Waipahu NB 22, Ewa NB 23
		Riders Alerts posted at affected bus stops
		Notice on TheBus website
Rt U1 Rt U1 (cont.)	Implemented Rt U1 (pilot)	Notification to CM Waters, CM Dos Santos-Tam, and CM Say

		Notification to Kaimuki NB 4, Diamond Head-Kapahulu-St. Louis Heights NB 5, Palolo NB 6, Manoa, McCully/Moiliili NB 8, Makiki NB 10, Ala Moana-Kakaako NB 11, Downtown-Chinatown NB 13
		Riders Alerts posted at affected bus stops
		Notice on TheBus website
Rts 81, 85, 86, 87, 88, 89, 90, 91, 91A, 92, 93, 96, 97, W1, & W2	Added trips	Notification to CM Waters, CM Dos Santos-Tam, CM Say, CM Tupola, CM Kiaaina, CM Fukunaga, CM Cordero, CM Elefante, and CM Tulba
		Notification to all NBs
		Riders Alerts posted at affected bus stops
		Notice on TheBus website
Rt 415	Reinstated base-period service	Notification to CM Tupola
		Rider Alert posted at affected stops
		Notice posted on TheBus website
		Notification to Makakilo-Kapolei-Honokai Hale NB 34
Rt 416	Re-routed Rt 416	Notification to CM Tupola
		Rider Alert posted at affected stops
		Notice posted on TheBus website
		Notification to Makakilo-Kapolei-Honokai Hale NB 34

ROUTE/STOP	2023 SERVICE CHANGES	PUBLIC OUTREACH
Rt U1	Discontinued Rt U1	Notification to CM Waters, CM Dos Santos-Tam, and CM Say
		Notification to Kaimuki NB 4, Diamond Head-Kapahulu-St. Louis Heights NB 5, Palolo NB 6, Manoa, McCully/Moiliili NB 8, Makiki NB 10, Ala Moana-Kakaako NB 11, Downtown-Chinatown NB 13
		Rider Alerts posted at affected bus stops
		Notice on TheBus website
BRIP Implementation	Modified routes: Rts A, C, 1L, 20, 40, 44, & 416 Established routes: Rts 46, 461, 531, 532, 533, 535, 541, 542, 544, 545, 551, 552, & PH8 Discontinued routes: Rts 71 & 73	Ewa Town Hall meeting, Waipahu Town Hall meeting, Joint Base Pearl Harbor Hickam Town Hall meeting, Pearl City Town Hall meeting
		Notification to all CMs and NBs
		Presentations at Kalihi Valley NB 16, Aliamanu-Salt Lake NB 18, Aiea NB 20, Pearl City NB 21, Waipahu NB 22, Ewa NB 23, Makakilo-Kapolei-Honokai Hale NB 34
		Rider Alerts posted at affected bus stops
		TheBus-Skyline System maps and site/route specific rider alerts handed out to affected riders at transit centers/major stops/transfer points and onboard affected routes.
		Notices mailed to properties fronting new bus stops
		Rider Alerts/Notices/Maps posted on TheBus and DTS websites
		Press release
Rts 2 & 2L	Rt 2: extended select trips, shortened select trips Rt 2L: re-routed	Notification to Kuliouou-Kalani Iki NB 2, Waialae-Kahala NB 3, Kaimuki NB 4, Diamond Head-Kapahulu-St Louis Hts. NB 5, Nuuanu-Punchbowl NB 12, Downtown-Chinatown NB 13, Kalihi-Palama NB 15, Aliamanu-Salt Lake-Foster Village NB 18, Aiea NB 20, Waipahu NB 22, Ewa NB 23, NB 24 Waianae Coast NB 24; Mililani-Waipio-Melemanu NB 25, Wahiawa-Whitmore Village NB 26, Kahaluu NB 29, Kaneohe NB 30, Kailua NB 31, Makakilo-Kapolei-Honokai Hale NB 34, Mililani Mauka-Launani Valley NB 35, Nanakuli-Maili NB 36
		Notification to CM Waters, CM Dos Santos-Tam, CM Tupola, CM Weyer, CM Kiaaina, CM Say, CM Cordero, CM Okimoto, and CM Tulba

		Rider Alerts posted at affected stops
		Notice posted on TheBus website
Rt 121	Discontinued Rt 121	Notification to Kuliouou-Kalani Iki NB 2, Waialae-Kahala NB 3, Kaimuki NB 4, Diamond Head-Kapahulu-St Louis Hts. NB 5, Nuuanu-Punchbowl NB 12, Downtown-Chinatown NB 13, Kalihi-Palama NB 15, Aliamanu-Salt Lake-Foster Village NB 18, Aiea NB 20, Waipahu NB 22, Ewa NB 23, NB 24 Waianae Coast NB 24; Mililani-Waipio-Melemanu NB 25, Wahiawa-Whitmore Village NB 26, Kahaluu NB 29; Kaneohe NB 30, Kailua NB 31, Makakilo-Kapolei-Honokai Hale NB 34, Mililani Mauka-Launani Valley NB 35, Nanakuli-Maili NB 36
		Notification to CM Waters, CM Dos Santos-Tam, CM Tupola, CM Weyer, CM Kiaaina, CM Say, CM Cordero, CM Okimoto, and CM Tulba
		Rider Alerts posted at affected stops
		Notice posted on TheBus website
		Letters mailed to residents in the surrounding area where service was discontinued
Rt 122	Re-routed Rt 122	Notification to Kuliouou-Kalani Iki NB 2, Waialae-Kahala NB 3, Kaimuki NB 4, Diamond Head-Kapahulu-St Louis Hts. NB 5, Nuuanu/Punchbowl NB 12, Downtown-Chinatown NB 13, Kalihi-Palama NB 15, Aliamanu-Salt Lake-Foster Village NB 18, Aiea NB 20, Waipahu NB 22, Ewa NB 23, NB 24 Waianae Coast NB 24; Mililani-Waipio-Melemanu NB 25, Wahiawa-Whitmore Village NB 26, Kahaluu NB 29; Kaneohe NB 30, Kailua NB 31, Makakilo-Kapolei-Honokai Hale NB 34, Mililani Mauka-Launani Valley NB 35, Nanakuli-Maili NB 36
		Notification to CM Waters, CM Dos Santos-Tam, CM Tupola, CM Weyer, CM Kiaaina, CM Say, CM Cordero, CM Okimoto, and CM Tulba
		Rider Alerts posted at affected bus stops
		Notice on TheBus website
Rt 151	Established Rt 151	Notification to Downtown/Chinatown Neighborhood Board NB 13, Liliha/Puunuui/Alewa/Kamehameha Heights Neighborhood Board NB 14, Waipahu Neighborhood Board NB 22
		Notification to CM Waters, CM Dos Santos-

		Tam, CM Okimoto and CM Tulba
		Rider Alerts posted at affected stops and emailed/delivered to hospitals and senior apartments along the new route
		Notice posted on TheBus website
		Letters to businesses fronting new bus stops
Rt 416	Re-routed Rt 416	Notification to Kuliouou-Kalani Iki NB 2, Waialae-Kahala NB 3, Kaimuki NB 4, Diamond Head-Kapahulu-St Louis Hts. NB 5, Nuuanu/Punchbowl NB 12, Downtown-Chinatown NB 13, Kalihi-Palama NB 15, Aliamanu-Salt Lake-Foster Village NB 18, Aiea NB 20, Waipahu NB 22, Ewa NB 23, NB 24 Waianae Coast NB 24; Mililani-Waipio-Melemanu NB 25, Wahiawa-Whitmore Village NB 26, Kahaluu NB 29; Kaneohe NB 30, Kailua NB 31, Makakilo-Kapolei-Honokai Hale NB 34, Mililani Mauka-Launani Valley NB 35, Nanakuli-Maili NB 36
		Notification to CM Waters, CM Dos Santos-Tam, CM Tupola, CM Weyer, CM Kiaaina, CM Say, CM Cordero, CM Okimoto, and CM Tulba
		Rider Alerts posted at affected bus stops
		Notice on TheBus website
Rt 434	Renumbered Rt 434 to Rt 444 and re-routed Rt 444	Notification to Kuliouou-Kalani Iki NB 2, Waialae-Kahala NB 3, Kaimuki NB 4, Diamond Head-Kapahulu-St Louis Hts. NB 5, Nuuanu/Punchbowl NB 12, Downtown-Chinatown NB 13, Kalihi-Palama NB 15, Aliamanu-Salt Lake-Foster Village NB 18, Aiea NB 20, Waipahu NB 22, Ewa NB 23, NB 24 Waianae Coast NB 24; Mililani-Waipio-Melemanu NB 25, Wahiawa-Whitmore Village NB 26, Kahaluu NB 29; Kaneohe NB 30, Kailua NB 31, Makakilo-Kapolei-Honokai Hale NB 34, Mililani Mauka-Launani Valley NB 35, Nanakuli-Maili NB 36
		Notification to CM Waters, CM Dos Santos-Tam, CM Tupola, CM Weyer, CM Kiaaina, CM Say, CM Cordero, CM Okimoto, and CM Tulba
		Rider Alerts posted at affected bus stops
		Notice on TheBus website
Rt 433	Re-routed Rt 433	Notification to Downtown/Chinatown Neighborhood Board NB 13, Liliha/Puunui/Alewa/Kamehameha Heights Neighborhood Board NB 14, Waipahu

		Neighborhood Board NB 22
		Notification to CM Waters, CM Dos Santos-Tam, CM Okimoto and CM Tulba
		Rider Alert posted at affected stops
		Notice posted on TheBus website

ROUTE/STOP	2024 SERVICE CHANGES	PUBLIC OUTREACH
Rt 10	Discontinued supplemental PM trips	Makiki NB 10, Ala Moana-Kakaako NB 11, Nuuanu-Punchbowl NB 12, Downtown-Chinatown NB 13, Liliha-Puunui-Alewa-Kamehameha Heights NB 14, Kalihi-Palama NB 15, Kalihi Valley NB 16, Aiea NB 20, Pearl City NB 21, Waipahu NB 22, Ewa NB 23, Mililani-Waipio NB 25, Wahiawa-Whitmore Village NB 26, North Shore NB 27, Koolauloa NB 28, Kahaluu NB 29, Kaneohe NB 30, Makakilo-Kapolei-Honokai Hale NB 34
		Notification to all CMs
		Rider Alert posted at affected stops
		Notification to Kawananakoa Middle School
		Notice posted on TheBus website
Rt 41	Modified supplemental AM trips	Makiki NB 10, Ala Moana-Kakaako NB 11, Nuuanu-Punchbowl NB 12, Downtown-Chinatown NB 13, Liliha-Puunui-Alewa-Kamehameha Heights NB 14, Kalihi-Palama NB 15, Kalihi Valley NB 16, Aiea NB 20, Pearl City NB 21, Waipahu NB 22, Ewa NB 23, Mililani-Waipio NB 25, Wahiawa-Whitmore Village NB 26, North Shore NB 27, Koolauloa NB 28, Kahaluu NB 29, Kaneohe NB 30, Makakilo-Kapolei-Honokai Hale NB 34
		Notification to all CMs
		Rider Alert posted at affected stops
		Notice posted on TheBus website
Rt 123	Discontinued supplemental AM trips	Makiki NB 10, Ala Moana-Kakaako NB 11, Nuuanu-Punchbowl NB 12, Downtown-Chinatown NB 13, Liliha-Puunui-Alewa-Kamehameha Heights NB 14, Kalihi-Palama NB 15, Kalihi Valley NB 16, Aiea NB 20, Pearl City NB 21, Waipahu NB 22, Ewa NB 23, Mililani-Waipio NB 25, Wahiawa-Whitmore Village NB 26, North Shore NB 27, Koolauloa NB 28, Kahaluu NB 29, Kaneohe NB 30, Makakilo-Kapolei-Honokai Hale NB 34

		Notification to all CMs
		Rider Alert posted at affected stops
		Notice posted on TheBus website
Rt 1L	Re-routed Rt 1L	Notice to Hawaii Kai NB 1, Kuliouou-Kalani Iki NB 2, Waialae-Kahala NB 3, Kaimuki NB 4, Diamond Head-Kapahulu-St. Louis Heights NB 5, Palolo NB 6, McCully-Moiliili NB 8, Makiki NB 10, Ala Moana-Kakaako NB 11, Downtown-Chinatown NB 13, Kalihi-Palama NB 15, Aliamanu/Salt Lake/Foster Village NB 18, Aiea NB 20, Waipahu NB 22, Ewa NB 23, Makakilo-Kapolei-Honokai Hale NB 34
		Notification to CM Waters, CM Say, CM Dos Santos-Tam, CM Cordero, CM Okimoto, and CM Tulba
		Rider Alert posted at affected stops
		Notice posted on TheBus website
Rts 11, 551, 552	Rt 11: discontinued Rts 551, 552: increased frequency, expanded span of service	Notice to Hawaii Kai NB 1, Kuliouou-Kalani Iki NB 2, Waialae-Kahala NB 3, Kaimuki NB 4, Diamond Head-Kapahulu-St. Louis Heights NB 5, Palolo NB 6, McCully-Moiliili NB 8, Makiki NB 10, Ala Moana-Kakaako NB 11, Downtown-Chinatown NB 13, Kalihi-Palama NB 15, Aliamanu/Salt Lake/Foster Village NB 18, Aiea NB 20, Waipahu NB 22, Ewa NB 23, Makakilo-Kapolei-Honokai Hale NB 34
		Notification to CM Waters, CM Say, CM Dos Santos-Tam, CM Cordero, CM Okimoto, and CM Tulba
		Rider Alert posted at affected stops
		Notice posted on TheBus website
Rts 43 & 432	Rt 432: discontinued Rt 43: discontinued a segment and increased frequency	Notice to Hawaii Kai NB 1, Kuliouou-Kalani Iki NB 2, Waialae-Kahala NB 3, Kaimuki NB 4, Diamond Head-Kapahulu-St. Louis Heights NB 5, Palolo NB 6, McCully-Moiliili NB 8, Makiki NB 10, Ala Moana-Kakaako NB 11, Downtown-Chinatown NB 13, Kalihi-Palama NB 15, Aliamanu/Salt Lake/Foster Village NB 18, Aiea NB 20, Waipahu NB 22, Ewa NB 23, Makakilo-Kapolei-Honokai Hale NB 34
		Notification to CM Waters, CM Say, CM Dos Santos-Tam, CM Cordero, CM Okimoto, and CM Tulba
		Rider Alert posted at affected stops
		Notice posted on TheBus website
Rt 46	Discontinued select AM trips	Notice to Hawaii Kai NB 1, Kuliouou-Kalani Iki NB 2, Waialae-Kahala NB 3, Kaimuki NB 4, Diamond Head-Kapahulu-St. Louis Heights

		NB 5, Palolo NB 6, McCully-Moiliili NB 8, Makiki NB 10, Ala Moana-Kakaako NB 11, Downtown-Chinatown NB 13, Kalihi-Palama NB 15, Aliamanu/Salt Lake/Foster Village NB 18, Aiea NB 20, Waipahu NB 22, Ewa NB 23, Makakilo-Kapolei-Honokai Hale NB 34
		Notification to CM Waters, CM Say, CM Dos Santos-Tam, CM Cordero, CM Okimoto, and CM Tulba
		Rider Alert posted at affected stops
		Notice posted on TheBus website
Rt 303	Re-routed Rt 303 and reduced frequency	Notice to Hawaii Kai NB 1, Kuliouou-Kalani Iki NB 2, Waialae-Kahala NB 3, Kaimuki NB 4, Diamond Head-Kapahulu-St. Louis Heights NB 5, Palolo NB 6, McCully-Moiliili NB 8, Makiki NB 10, Ala Moana-Kakaako NB 11, Downtown-Chinatown NB 13, Kalihi-Palama NB 15, Aliamanu/Salt Lake/Foster Village NB 18, Aiea NB 20, Waipahu NB 22, Ewa NB 23, Makakilo-Kapolei-Honokai Hale NB 34
		Notification to CM Waters, CM Say, CM Dos Santos-Tam, CM Cordero, CM Okimoto, and CM Tulba
		Rider Alert posted at affected stops
		Notice posted on TheBus website
Rts 7, 9, 307	Rt 7: restructured Rt 9: discontinued Rt 307: established	Hawaii Kai NB 1, Kuliouou-Kalani Iki NB 2, Waialae-Kahala NB 3, Kaimuki NB 4, Diamond Head-Kapahulu-St Louis NB 5, Palolo NB 6, Manoa NB 7, McCully-Moiliili NB 8, Waikiki NB 9, Makiki-Tantalus NB 10, Ala Moana-Kakaako NB 11, Downtown-Chinatown NB 13, Liliha-Alewa NB 14, Kalihi-Palama NB 15, Kalihi Valley NB 16, Aliamanu-Salt Lake NB 18, Aiea NB 20, Waimanalo NB 32
		Notification to CM Waters, CM Dos Santos-Tam, CM Kiaaina, CM Say, and CM Cordero
		Rider Alert posted at affected stops
		Notice posted on TheBus website
Rts 9s, 20, 200	Rt 9s: renumbered to Rt 200 Rt 20: discontinued a segment Rt 200: extended routing	Hawaii Kai NB 1, Kuliouou-Kalani Iki NB 2, Waialae-Kahala NB 3, Kaimuki NB 4, Diamond Head-Kapahulu-St Louis NB 5, Palolo NB 6, Manoa NB 7, McCully-Moiliili NB 8, Waikiki NB 9, Makiki-Tantalus NB 10, Ala Moana-Kakaako NB 11, Downtown-Chinatown NB 13, Liliha-Alewa NB 14, Kalihi-Palama NB 15, Kalihi Valley NB 16, Aliamanu-Salt Lake NB 18, Aiea NB 20, Waimanalo NB 32

		Presentations to Kuliouou-Kalani Iki NB 2, Waialae-Kahala NB 3, Kaimuki NB 4, Diamond Head-Kapahulu-St Louis NB 5, Palolo NB 6, Manoa NB 7, Waikiki NB 9, Makiki-Tantalus NB 10, Ala Moana-Kakaako NB 11, Kalihi-Palama NB 15, and Kalihi Valley NB 16
		Notification to CM Waters, CM Dos Santos-Tam, CM Kiaaina, CM Say, and CM Cordero
		Rider Alert posted at affected stops
		Notice posted on TheBus website
Rt 18	Discontinued Rt 18	Hawaii Kai NB 1, Kuliouou-Kalani Iki NB 2, Waialae-Kahala NB 3, Kaimuki NB 4, Diamond Head-Kapahulu-St Louis NB 5, Palolo NB 6, Manoa NB 7, McCully-Moiliili NB 8, Waikiki NB 9, Makiki-Tantalus NB 10, Ala Moana-Kakaako NB 11, Downtown-Chinatown NB 13, Liliha-Alewa NB 14, Kalihi-Palama NB 15, Kalihi Valley NB 16, Aliamanu-Salt Lake NB 18, Aiea NB 20, Waimanalo NB 32
		Presentations to Kuliouou-Kalani Iki NB 2, Waialae-Kahala NB 3, Kaimuki NB 4, Diamond Head-Kapahulu-St Louis NB 5, Palolo NB 6, Manoa NB 7, Waikiki NB 9, Makiki-Tantalus NB 10, Ala Moana-Kakaako NB 11, Kalihi-Palama NB 15, and Kalihi Valley NB 16
		Notification to CM Waters, CM Dos Santos-Tam, CM Kiaaina, CM Say, and CM Cordero
		Rider Alert posted at affected stops
		Notice posted on TheBus website
Rts 23 & 24	Rt 23: re-routed Rt 24: discontinued	Hawaii Kai NB 1, Kuliouou-Kalani Iki NB 2, Waialae-Kahala NB 3, Kaimuki NB 4, Diamond Head-Kapahulu-St Louis NB 5, Palolo NB 6, Manoa NB 7, McCully-Moiliili NB 8, Waikiki NB 9, Makiki-Tantalus NB 10, Ala Moana-Kakaako NB 11, Downtown-Chinatown NB 13, Liliha-Alewa NB 14, Kalihi-Palama NB 15, Kalihi Valley NB 16, Aliamanu-Salt Lake NB 18, Aiea NB 20, Waimanalo NB 32
		Presentations to Kuliouou-Kalani Iki NB 2, Waialae-Kahala NB 3, Kaimuki NB 4, Diamond Head-Kapahulu-St Louis NB 5, Palolo NB 6, Manoa NB 7, Waikiki NB 9, Makiki-Tantalus NB 10, Ala Moana-Kakaako NB 11, Kalihi-Palama NB 15, Kalihi Valley NB 16
		Notification to CM Waters, CM Dos Santos-Tam, CM Kiaaina, CM Say, and CM Cordero
		Rider Alert posted at affected stops
		Notice posted on TheBus website

ROUTE/STOP	2025 PLANNED SERVICE CHANGES	PUBLIC OUTREACH
Rts 41, 44, 47, 415, 461	Rts 41, 44, 415, 416: restructured Rt 47: established	Notification and presentations at Ewa NB 23, Makakilo-Kapolei-Honokai Hale NB 34
		Notification to CM Waters, CM Cordero, CM Tupola, and CM Tulba
		Conducted 2 surveys (initial and follow-up survey)

Public Outreach Activities for
2025 Public Transit Title VI Program

The Title VI Program will be emailed to all Neighborhood Boards. Presentations will be made as requested.

Attachment 3

Limited English Proficient Plan
(LEP Plan)

Updated January 2025

City and County of Honolulu
Department of Transportation Services
Public Transit Division

Limited English Proficient Plan
(LEP Plan)

Updated January 2025

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I. Introduction

The Department of Transportation Services (DTS) of the City and County of Honolulu and its contracted operator of public transit services, O'ahu Transit Services, Inc. (OTS) are committed to providing meaningful access to all patrons and users of Honolulu's public transit system who are Limited English Proficient (LEP).

The January 2025 LEP Plan (Plan) revision updates the 2022 LEP Plan developed in accordance with the Federal Transit Administration (FTA) Circular FTA C 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients dated October 1, 2012 (Circular). The Plan identifies the prevalent languages of LEP persons likely to be public transit users and specifies the types of language assistance services that DTS provides. DTS and OTS are committed to providing language assistance services for all LEP transit users to the maximum extent feasible.

II. Definition of a Limited English Proficient Person

The Circular defines an LEP person as a person for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S, Census that they speak English less than very well, not well, or not at all. Hawaii Revised Statute Section 321-C-2 defines LEP person as "an individual who, on account of national origin, does not speak English as the person's primary language and who self identifies as having a limited ability to read, write, speak, or understand the English language".

III. Elements of the LEP Plan

This section contains the essential elements prescribed under the Circular. DTS, OTS, and subrecipients who do not develop their own plans are responsible for implementing this LEP plan.

a. Four Factor Analysis (FFA) Results

Using the Honolulu Transit Comprehensive Operations Analysis Task 1 On-Board Survey, Cambridge Systematics, conducted on-board from August 2021 – January of 2022, the FFA identified the proportion of LEP persons who self-identified as not speaking English well. The survey also focused on rider demographics, travel patterns, ability to speak English well, and fare usage. There were approximately 5388 possible survey participants.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.

The Survey was used to identify LEP individuals that use DTS public transit services. The person who is being surveyed has the option of doing the survey in their preferred language that was offered or in English. One of the questions asked was for those personally who speak a language other than English at

home, participants were asked how well they spoke English. According to the data, roughly 8% do not speak English well and not at all. See Table 1 below:

Table 1: Survey Question: How well do you speak English?	
Speak English Very well	56%
Speak English well	36%
Speak English not well	7%
Not at all	<1%
Total	100%

Of the people who do not speak English well and not at all, the four (4) languages most frequently spoken are: (see Table 2 below)

- Tagalog/Ilocano (Filipino) (41%)
- Japanese (24.6%)
- Chuukese (Micronesian) (12.7%)
- Other (see Table 2 below) (11.2%)
- Chinese (Cantonese and Mandarin included) (10.5%)

Table 2

Languages	**Number of people surveyed on Random Fixed Routes**	**Total**	**Percentage**
Chinese	14		10.45%
Japanese	33		24.63%
Ilokano	30		22.39%
Tagalog	25		18.66%
Chuukese (Kapasen Chuuk)	17		12.69%
Other(s) listed below :	15		11.19%
French (2)		134	100.00%
Korean (4)			
Nelain (1)			
Laotian (1)			
Spanish (2)			
Thai (1)			
FSM (1)			
Samoan (1)			
Vietnamese (1)			
Palauan (1)			

Factor 2: The frequency with which LEP persons come into contact with the program.

According to Oahu Transit Services' ridership and performance statistics (conducted weekly throughout the year), average pre-pandemic weekday boardings were about 188,000. However, the period of 2022 – 2025 (the years after the advent of the COVID-19 pandemic) saw only about 72% recovery to pre-pandemic levels. This equates to about 135,360 average weekday boardings. Using a ratio of 134 LEP persons surveyed to 5,388 (the total number of survey participants), we can estimate of the total number of LEP persons that ride TheBus on an average weekday. This amount is about 3,366 LEP persons per average weekday.

134 LEP surveyed	3,366 avg. LEP weekday boardings
5,388 total surveyed	135,360 total avg. weekday boardings

Applying the percentages in Factor 1 to the 3,366 LEP persons, the prevalent languages of the people who do not speak English well that board on an average weekday are:

- Tagalog/Ilocano (Filipino) (≈41%) 1,380 LEP persons
- Japanese (≈24.6%) 828 LEP persons
- Chuukese (Micronesian) (≈12.7%) 427 LEP persons
- Other (see Table 2 below) (≈11.2%) 376 LEP persons
- Chinese (≈10.5%) 353 LEP persons

Under the Safe Harbor Provision, LEP obligations include languages that constitute 5% or 1,000 persons, whichever is less of the people (3,366) who may use or have contact with public transit services and who do not speak English well. The 5% threshold is 168 persons.

Tagalog/Ilocano, Japanese, Chuukese, and Chinese would be considered for appropriate outreach (interpretation and translation of documents) in these respective languages. Other languages that are under the "Other" category (listed in table 2) do not have any single language that meets the threshold of 5% or 168 persons and thus do not require appropriate outreach.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives.

Public transportation is a vital service for many people who are unable to drive for various reasons and those who do not have access to personal vehicles. They depend on the public transit system to take them to where they need to go for work, school, shopping, medical, recreation, and visiting friends and families. Therefore, providing language assistance for LEP public transit users is an important service to ensure they are able to understand how to use the public

transit system to their advantage and benefit. The Survey conducted showed considerable demographic profiles of LEP persons taking TheBus. These profiles are factors in considering the nature of how they may rely on the bus for in their daily lives.

According to the Survey's data for LEP persons:

- Ethnicity: 98% are not white
- Annual Household Income: 43% of LEPs make less than $100K annually*
- Employment Status: 63% Employed
- Bus Alternative (vehicle): 63% do not own a vehicle in their household
- Driver's License Status: 75% do not have a driver's license

*While 55% refuse to answer or do not know, median household income in Honolulu County is $90,704 according to 2021 American Community Survey. Keep in mind income is a sensitive topic to discuss and share.

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

DTS' annual operating budget includes funding for the costs of services available for LEP outreach:

- Phone interpretation services: Professional phone interpretation services
- Translation services: Professional translation services
- Printing: Vital documents in identified languages
- Signage: In identified languages as applicable and necessary
- Advertisement: Notices in identified language publications as applicable and necessary
- Consultants: Professional services contracted as applicable and necessary to meet LEP requirements
- Other available resources:
    - Phone interpretation services: In-house staff, other government & non-profit agencies.
    - Partnering with other State, County, and non-profit agencies to provide transit information to the LEP community (i.e. State Office of Language Access).
    - Translation services: In-house staff, other government & non-profit agencies.

b. Description of Language Assistance Services

- **Types of Language Services Available**

  Bus Information, Bus Customer Service, and Bus Pass Offices; Handi-Van Reservations; and Handi-Van Eligibility Center all utilize an interpreter service vendor to provide services to non-English speaking customers. These include Pacific Interpreters (primary) and Corporate Translation Services (CTS) Language Links (secondary).

- **How Staff Can Obtain These Services**

  All service staff members have access to the interpreter vendor telephone numbers and codes.

- **Responding to LEP Callers**

  1. Ascertain if the caller has any English comprehension to use simplified English.
  2. If unable to use simplified English, ascertain the country of origin and/or language dialect to utilize in-house interpreter resources.
  3. If unable to identify language or no in-house resource, call the interpreter vendor to provide language assistance via three-way conversation, LEP caller, staff member, and interpreter.

- **Responding to Written Communication from LEP Persons**

  1. Identify language and ascertain if there are in-house staff for that language. OTS currently has Ilocano, Tagalog, Japanese, and Chinese, written and spoken language proficient employees.
  2. If no in-house staff, use translation vendor.

- **Responding to In-Person Contact with LEP Persons**

  1. Identify language with language poster or cards.
  2. Call interpreter vendor to provide language assistance via two-way conversation if no in-house resource.

- **Ensuring Competency of Interpreters and Translation**

  1. Vendors are selected from the State of Hawaii Price and Vendor List Contracts. There is a screening and credentialing process for interpreter vendors.
  2. OTS in-house staff is experienced with years of service.
  3. Other agency resources are the Consulates and State Office of Language Access.

- **Documents Considered Essential for Translation**

  DTS considers the following vital documents essential for translation.

  TheBus documents include:

  - Notifying the Public of Rights Under Title VI notice
  - Non-Discrimination and ADA Complaint Forms
  - "You Have Rights" car card referencing Title VI and Environmental Justice
  - Lost and Found Notification
  - Annual Bus Pass Application
  - Senior Citizen Bus Pass Application
  - Senior Citizen Annual Bus Pass Renewal Application
  - Person with a Disability Bus Pass Application
  - Request for Refund/Exchange/Adjustment
  - Bus Pass Subsidy Program Application

  TheHandi-Van documents include:

  - Notifying the Public of Rights Under Title VI notice
  - Non-Discrimination and ADA Complaint Forms
  - Rider's Guide
  - Eligibility Information Brochure

  All documents are translated in languages identified in the FFA and are available in hard copy, electronic format, or can be requested via email (thebustop@honolulu.gov), telephone (768-8368), or in person at DTS or TheBus Pass/Customer Service Offices.

- **Subrecipient Monitoring**

  DTS staff monitors its subrecipients on an annual basis to ensure compliance with FTA LEP requirements through on-site visits and desk reviews of requested documents and records.

c. Providing Notice to LEP Persons of Assistance

DTS and OTS communicate with LEP populations by posting notices/signs, online information, and outreach documents in languages identified in the FFA; and networking with community-based organizations and social service agencies.

A car card onboard buses in FFA required languages provides LEP riders with contact information on obtaining interpreter services for bus information.

TheHandi-Van Eligibility Center communicates with LEP populations by posting signs in its office and through outreach documents.

d. Monitoring and Updating the Plan

Monitoring and updating the Plan will be conducted during the 3-year interval preceding the Title VI Program submission year to FTA in accordance with the FTA Circular. DTS will review and assess Plan applicability, availability of resources (staff, partner agencies, funding), LEP population needs, complaint logs, the most current data (i.e. Census/American Community Survey/State Databook), and relevant surveys/studies to complete Plan updates.

e. Description of How the Recipient Trains the Employees to Provide Language Assistance

DTS and OTS incorporate an LEP presentation into operators' new hire training and refresher training for correct handling of LEP riders and their safety. All other relevant frontline employees are required to view the LEP training materials on an annual basis to ensure they possess the knowledge and skills required to provide timely and reasonable language assistance to the LEP population. Training information includes: DTS LEP Plan, local demographic LEP population data, Hawaii Language Access Law background, printed LEP population vital documents/materials, and handling requests in foreign languages.

TheHandi-Van Eligibility Center provides both initial and annual refresher training for all relevant employees that is focused on customer service and to ensure they possess the knowledge and skills required to provide timely and reasonable language assistance to the LEP population.

Attachment 4

Title VI Oversight of Subrecipients, Lessees, and Third Party Contactors Policies and Procedures

CHAPTER: Transportation Mobility Division	INDEX CODE: 7-1.10
CATEGORY: Administration	**PAGE 1 of 2**
SUBJECT: **FTA Title VI Oversight of Subrecipients, Lessees, and Third Party Contractors**	**Amendment 1:** **Approved by: DTS Director Wes Frysztacki**
REFERENCES: 49 CFR Part 21 Nondiscrimination in Federally Assisted Programs of the Department of Transportation –Effectuation of Title VI of the Civil Rights Act of 1964; FTA C 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration (FTA) Recipients (or current version); Comprehensive Review Guide for Triennial and State Management Reviews (current FY version)	Effective/Approval Date: January 10, 2019

PURPOSE

To establish oversight and monitoring procedures to ensure that subrecipients, lessees, and contractors (collectively referred to as "subrecipients") are complying with the U.S. Department of Transportation Title VI (TVI) regulations as referenced above.

As the primary recipient of FTA financial assistance, the Department of Transportation Services (DTS) Transportation Mobility Division (TMD) must monitor their subrecipients for compliance with TVI regulations. Subrecipients have the option to develop their own TVI Program or adopt the DTS-TMD TVI Program. If a subrecipient is not in compliance with TVI requirements, then DTS-TMD is also not in compliance.

All subrecipients must include the needs of minorities, low-income, and limited-English proficient (LEP) populations in planning activities; and assure that minorities, low-income, and LEP populations are not being denied the benefits of or excluded from participation in their programs.

DTS-TMD shall have the sole responsibility for determining if subrecipients are in compliance with TVI regulations and requirements, including TVI oversight of subrecipients' contractors by subrecipients, if applicable.

PROCEDURES

In order to ensure the primary recipient and subrecipient are in compliance with TVI regulations and requirements, DTS-TMD shall adhere to the following procedures.

1. Title VI Program Submission. Subrecipients that develop their own TVI Programs must submit it to DTS-TMD for compliance review.
    - New subrecipients shall submit their TVI Program for review within 90 days of the effective date of their subrecipient agreement.
    - Existing subrecipients shall submit TVI Programs for review every three years by September 30th.
    - DTS-TMD will complete the compliance review and notify the subrecipient of the results within 90 days of the TVI Program submission date.

- Deficiencies are addressed in Section 4. Corrective Actions.

2. Provide Assistance to Subrecipients. DTS-TMD will assist all subrecipients with TVI compliance as necessary and appropriate, including TVI program contents, general reporting reqirements, ans other information/data related to the minority, low-income, and LEP populations that participate in the subrecipient's programs and activities.

3. Subrecipient Monitoring and Oversight. DTS-TMD will monitor all subrecipients for TVI compliance. Monitoring and oversight activities include but are not limited to: on-site visits, review of relevant records/documents/data/website, interviews, phone/email communication.

- DTS-TMD will monitor subrecipients on an Annual basis.
- Oversight of TVI general requirements will be conducted using Public Transit Title VI Program Compliance Oversight Monitoring Form-Section 1 General Requirements (12/1/18 or current version).
- DTS-TMD will notify the subrecipient of the results within 30 days of the monitoring completion date.
- Deficiencies are addressed in Section 4. Corrective Actions.

4. Corrective Actions. Effective compliance with Title VI regulations and requirements requires DTS-TMD to take prompt action to achieve voluntary compliance by its subrecipients in all instances in which deficiencies are found. If a subrecipient is determined to be non-compliant:

- DTS-TMD will offer assistance as necessary to correct the deficiencies.
- Deficiencies shall be corrected within 30, 60, or 90 days (depending on the corrective action) of the notification date of deficiencies.
- DTS-TMD will issue a notice that corrective actions have been satisfactorily completed within 30 days of the completion date.

Attachments:
Title VI Program Oversight Monitoring Form: General Requirements
Title VI Program Oversight Monitoring Form: Fixed Route Service Requirements

Public Transit Title VI Program Compliance
Oversight Monitoring Form (12/01/18)

Applicability: As a direct and primary recipient of Federal Transit Administration (FTA) funds, the Department of Transportation Services (DTS) is responsible for ensuring that entities receiving FTA financial assistance through DTS comply with FTA's
Title VI (TVI) regulations and requirements. *References: FTA Circular 4702.1B, Comprehensive Review Guide for Triennial Reviews (current FY).*

Requirement: DTS must monitor their subrecipients/contractors for compliance with TVI regulations and requirements. *Reference: DTS Standard Operating Procedure 7-1.10 FTA Title VI Program Oversight.*

Monitoring Date: _____ Last Monitoring Date: _____

Agency: _____ Address: _____

POC: _____ Phone: _____ Email:_____

Conducted by: _____

DTS Public Transit Title VI Program Section 1: General Requirements

I. Title VI Program
[ ] Compliant
[ ] Agency follows DTS Public Transit TVI Program.
[ ] Agency TVI Program.
[ ] Agency's TVI Program has been approved by DTS.
[ ] A copy of the most current TVI Program is available on the agency website.
[ ] Not Compliant
Corrective Actions:
_____
_____
_____

II. Title VI Notice to the Public
[ ] Compliant
[ ] Locations where the notice is posted:
[ ] Reception area [ ] Transit vehicles [ ] Transit facilities
[ ] Meeting rooms [ ] Other: _____
[ ] Not Compliant
Corrective Actions:
_____
_____
_____

III. Title VI Complaint Procedures (*Instructions on how to file a Title VI complaint)*
[ ] Compliant
[ ] Procedures to request additional information on the recipient's TVI obligations.
[ ] Procedures to file a TVI discrimination complaint against the recipient.
[ ] Available on the agency website.
[ ] Translated into languages identified in the most current Language Assistance Plan (LAP).
[ ] Not Compliant

Corrective Actions:

_____

_____

_____

IV. Title VI Complaint Form

[ ] Compliant

[ ] Available on the agency website.

[ ] Translated into languages identified in the most current LAP.

[ ] Not Compliant

Corrective Actions:

_____

_____

_____

V. List of transit-related Title VI investigations, complaints, and lawsuits

[ ] Compliant

[ ] Procedures for investigating and tracking TVI complaints filed against agency.

[ ] Reports complaints and investigations on an annual basis.

[ ] Reports lawsuits immediately upon occurrence.

[ ] Not Compliant

Corrective Actions:

_____

_____

_____

VI. Public Participation Plan (PPP)

[ ] Compliant

[ ] Agency follows DTS Public Transit PPP.

[ ] Agency PPP.

[ ] Agency's PPP has been approved by DTS.

[ ] PPP efforts made since the last monitoring date _____.

[ ] List of upcoming activities subject to PPP since last monitoring date.

[ ] PPP is available on the agency's website.

[ ] Not Compliant

Corrective Actions:

_____

_____

_____

VII. Language Assistance Plan (LAP)

[ ] Compliant

[ ] Agency follows DTS Public Transit LAP.

[ ] Agency LAP.

[ ] Agency's LAP has been approved by DTS.

[ ] Four Factor Analysis.

[ ] Monitored and last updated on _____.

[ ] Language assistance services.

[ ] Limited English Proficient (LEP) persons notification of language assistance.

[ ] Vital documents translated.

[ ] Oral interpretation services available.

[ ] Employees trained to provide timely and reasonable language assistance.

[ ] LAP is available on the agency's website.

[ ] Not Compliant
Corrective Actions:

_____

_____

_____

VIII. Monitoring of entities receiving FTA financial assistance through DTS (TVI requirements flow down to all third party contractors and their contracts at every tier.)

[ ] Compliant
- [ ] Agency list of third party contracts with/without flow down of FTA funds since last monitoring date _____.
- [ ] Third party contractors receiving flow down of FTA funds from Agency.
- [ ] Agency documentation of TVI monitoring and contractor compliance with TVI requirements and regulations.

[ ] Not Compliant
Corrective Actions:

_____

_____

_____

IX. Transit Facility Equity Analysis

[ ] Compliant
- [ ] Agency constructed or plans to construct a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., since the last Public Transit TVI Program submission to FTA on _____.
- [ ] Equity analysis approved by DTS.
- [ ] Equity analysis not applicable. Reason _____.

[ ] Not Compliant
Corrective Actions:

_____

_____

_____

[ ] NA

X. Board Approval and Board Minority Representation

[ ] Compliant
- [ ] Agency Board approval.
- [ ] Table depicting racial breakdown of non-elected Board members.

[ ] Not Compliant
Corrective Actions:

_____

[ ] NA

Public Transit Title VI Program Compliance
Oversight Monitoring Form (12/01/18)

Applicability: As a direct and primary recipient of Federal Transit Administration (FTA) funds, the Department of Transportation Services (DTS) is responsible for ensuring that entities receiving FTA financial assistance through DTS comply with FTA's
Title VI (TVI) regulations and requirements. *Reference: Comprehensive Review Guide for Triennial Reviews (current FY).*

Requirement: DTS must monitor their subrecipients/contractors for compliance with TVI regulations and requirements. *References: FTA Circular 4702.1B; DTS Standard Operating Procedure 7-1.10 FTA Title VI Program Oversight.*

Monitoring Date: _____ Last Monitoring Date: _____

Agency: _____ Address: _____

POC: _____ Phone: _____ Email:_____

Conducted by: _____

DTS Public Transit Title VI Program Section 2: Fixed Route Service Requirements

I. System-wide Service Standards for Each Mode
- [ ] Compliant
  - [ ] Vehicle load.
  - [ ] Vehicle headway.
  - [ ] On-time performance.
  - [ ] Service availability.
- [ ] Not Compliant
  Corrective Actions:
  _____
  _____
  _____

II. System-wide Service Policies
- [ ] Compliant
  - [ ] Transit amenities.
  - [ ] Vehicle assignment.
- [ ] Not Compliant
  Corrective Actions:
  _____
  _____
  _____

III. Demographic and Service Profile

[ ] Compliant
- [ ] Base service area.
- [ ] Title VI areas.
- [ ] Environmental Justice areas.
- [ ] Title VI and Environmental Justice areas.

[ ] Not Compliant

Corrective Actions:

_____
_____
_____

IV. Demographic Ridership and Travel Patterns

[ ] Compliant

[ ] Not Compliant

Corrective Actions:

_____
_____
_____

V. Service and Fare Changes

[ ] Compliant
- [ ] Public engagement process.

[ ] Not Compliant

Corrective Actions:

_____
_____
_____

VI. Monitoring Program and Report

[ ] Compliant

[ ] Not Compliant

Corrective Actions:

_____
_____
_____

Attachment 5

Determination of Site or Location of Facilities Policy and Procedures

CHAPTER: Transportation Mobility Division	INDEX CODE: 7-5.13
CATEGORY: Facilities and Equipment	PAGE 1 of 271
SUBJECT: Determination of Site or Location of Facilities	Approved By: DTS Director Wes Frysztacki
REFERENCES: FTA C 4702.IB, Title VI Requirements & Guidelines for Federal Transit Administration (ETA) Recipients (or current version); Comprehensive Review Guide for Triennial and State Management Reviews (current FY)	Effective/Approval Date: April 2, 2019

PURPOSE

To establish procedures for selecting sites for constructing transit facilities.

PROCEDURES

1. Facilities included in this SOP include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. For purposes of this requirement, "facilities" does not include bus shelters, as these are transit amenities, nor does it include transit stations, power substations, etc.

2. Site evaluation will be based on the following criteria:

    a. Level of need.
    b. Impact to surrounding properties.
    c. Accessibility to bus and handi-van routes.
    d. Impact to existing infrastructure.
    e. Environmental impact.
    f. Terrain constraints.
    g. Traffic impact.
    h. Size of property to accommodate the project requirements.
    i. Adequacy of existing utilities (i.e. sewer, water, drainage, fire protection, electricity, etc.).
    j. Flood zone impact.
    k. Obtain the necessary approvals for facility construction.
    l. DTS Director's approval.
    m. Conform to the objectives of FTA's Title VI Program, as set forth in ETA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients." The determination of site or location of facilities shall conform to Title 49 CFR Section 21 .9(b)(3).

3. When evaluating locations of facilities:

    a. Give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result.
    b. Analysis should be done at the Census tract or block group, where appropriate, to ensure that proper perspective is given to localized impacts.

c. If it is determined that the location of the project will result in a disparate impact on the basis of race, color, or national origin, the project may only be located in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. It must be shown how both elements are met. In order to make this showing, 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.
d. Conduct outreach to persons potentially impacted by the siting of facilities.
e. A site determination or location of facilities Title VI analysis shall be completed prior to selection of the preferred site.

Attachment 6

Honolulu City Council Approval

Awaiting approval (placeholder)

Attachment 7

Monitoring Report
System-wide Service Standards & Policies

Monitoring of System-Wide Service Standards & Policies

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Overview

Federal Transit Administration (FTA) C 4702.1B Circular (Circular) Chapter 4 requires all transit providers that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area of 200,000 or more in population to include information about service standards and policies for each specific fixed route mode of service provided to ensure service design and operational practices do not result in discrimination on the basis of race/color/national origin (TVI), or low-income status (EJ). In accordance with the Circular guidelines, system-wide service standards address vehicle load, headway, on-time performance, service availability; and system-wide service policies include transit amenities and vehicle assignment.

Routes identified as TVI/EJ are from 2020 Census block data from the Oahu Metropolitan Planning Organization's "Title VI/Environmental Justice Populations by Block Group" ArcGIS Map: https://arcg.is/0y19u4 .

Census block groups were identified as TVI/EJ if the minority and/or low-income percentage in that Census block group was greater than the mean percentage (29%) of minority and/or low-income for the system (within a ½ mile radius of a bus route). Routes that exceed the mean TVI/EJ population among all routes are designated as TVI/EJ routes. The mean is based on the total TVI/EJ percentage within a ½ mile radius of all routes divided by the total number of routes. See Figure 1.

TheBus routes/schedules continue to be evaluated/adjusted to address the changes in ridership, service demand/productivity, operating costs, and resource/budget allotments.

Findings

The results of TheBus service performance for all 121 routes are summarized below. Nine (9) routes (highlighted) are identified as TVI/EJ and 112 routes as non TVI/EJ. Overall, public transit services are provided in a comparable/non-discriminatory manner to TVI/EJ and non TVI/EJ populations. Improving service performance for all routes is an ongoing work in progress.

Although the results identified schedule adherence as a major concern, it is a system-wide issue for a majority of the routes and does not disproportionately affect TVI/EJ routes. Routes that do not meet the service standards and policies identified in this report are monitored/evaluated for further analysis to redistribute/adjust service and/or implement other mitigation measures that align with current service levels and budget constraints.

System-wide Service Standards:

- Vehicle Load: OTS has a variety of vehicles with different loads and capacities. Although post-pandemic ridership levels are about 65% of its pre-pandemic levels, there are routes that experience heavier levels of overcrowding because of ridership demands.

- Vehicle Headway: After the pandemic's impact on ridership levels, revenue, and resource/budget allocations, there have been efforts to adjust affected scheduled headways for all service modes, and depending on the route's profile/service area/ridership levels, headways for routes in the same service mode category can vary. Therefore, the scheduled headway standard is expressed as a range and the headways for the majority of routes fall within the established range. Routes with non-conforming scheduled headways are evaluated and adjusted to the maximum extent feasible. Alignment with the headway standard is affected by ridership and budget constraints.

- On-time performance: The majority of routes do not meet the on-time performance standard of 80% for all their scheduled time periods, except for six Peak Express routes, ten Circulator Routes, and one Rapid Bus. Out of the nine Title VI routes, only three met the on-time performance standard. Besides road/lane closures/detours and rail construction along a major bus corridor, other external/operating factors that contribute to service delays include traffic accidents and passenger issues such as fare, mask, non-service animal enforcement. Non-performing routes are monitored/evaluated to identify factors affecting on-time performance for mitigation purposes, such as insufficient running times or long-term construction projects.

- Service availability: The standard that a bus route is within a ½ mile radius for 80% of the population was met for TVI/EJ (99%) and non-TVI/EJ (99.8%) populations.

Service Policies:

- Transit amenities: Overall, the distribution of transit amenities are comparable between the TVI/EJ and non-TVI/EJ routes considering how few TVI/EJ routes there are:

  33% of bus stops along TVI/EJ routes have shelters.
  42% of bus stops along non-TVI/EJ routes have shelters.
  62% of bus stops along TVI/EJ routes have benches.
  66% of bus stops along non-TVI/EJ routes have benches.
  35% of bus stops along TVI/EJ routes have trash containers.
  44% of bus stops along non-TVI/EJ routes have trash containers.

- Vehicle assignment: Overall, vehicle assignment for TVI/EJ and non TVI/EJ routes are comparable.

Average fleet age:	11.78 years
Average TVI/EJ age:	11.07 years
Average non TVI/EJ age:	11.92 years

Route Description and Time Schedules

Current Individual route maps and time schedules can be viewed by visiting the OTS website: http://www.thebus.org/route/routes.asp.

Hard copies of maps and schedules are available at all Satellite City Halls, DTS, and TheBus Pass Office or mailed on request by calling (808) 768-8371 or emailing thebustop@honolulu.gov.

Figure 1
Bus Route Summary*: Proportion of TVI/EJ Served Populations
(Title VI/EJ Routes Shaded)

Route (Service Area)	% TVI/EJ in Service Area	Route (Service Area)	% TVI/EJ in Service Area	Route (Service Area)	% TVI/EJ in Service Area	Route (Service Area)	% TVI/EJ in Service Area
1	12	54	6	99	17	532	1
1L	11	60	14	102	2	533	1
2	11	61	28	121	5	535	3
2L	11	65	2	122	4	541	2
3	5	66	4	151	13	542	1
4	3	67	6	200	3	544	0
5	2	69	12	234	0	545	0
6	4	80	3	301	23	551	5
7	16	81	22	302	23	552	7
8	2	82	4	303	20	651	2
9	11	83	11	306	47	671	0
9s	7	84	8	307	51	672	0
10	27	84A	8	401	48	673	0
11	8	85	16	402	39	674	0
13	11	86	17	403	46	A	6
14	2	87	3	411	11	C	27
123	3	88	17	413	16	E	9
18	1	88A	14	414	8	PH1	36
20	11	89	11	415	16	PH2	6
23	0	90	8	416	23	PH3	11
24	0	91	7	432	31	PH4	5
32	9	91A	9	433	25	PH6	10
40	25	92	11	444	26	PH7	7
41	9	93	27	461	13	PH8	21
42	14	94	12	501	1	W1	11
43	29	95	15	503	3	W2	16
44	8	96	10	504	0	W3	19
46	18	96A	12	511	32		
51	13	97	9	512	22		
52	16	98	9	521	0		
53	6	98A	8	531	0		

(Source: The Oahu Metropolitan Planning Organization Title VI and Environmental Justice Populations by Block Group, 2020.)

Figure 2 above displays the bus routes and the proportion of the service area (within a ½ mile radius of a bus route) designated as TVI/EJ. Of 120 routes*, 9 routes (highlighted) are identified as TVI/EJ and 111 routes as non TVI/EJ. Routes were identified as TVI/EJ routes based on a ½ mile radius that the route served. 29% is used as the minimum level for designating routes as TVI/EJ because it is the mean percentage of all TVI/EJ populations within a ½ mile radius among the routes.

*Includes routes that have been previously discontinued and modified within the years of 2022-2024, the years after the last completed Title VI program report was completed.

Figure 2
Route Names

ROSTER OF BUS ROUTES from 2022-2025 **Effective 08/18/24**

Route No.	KALIHI DIVISION ROUTE NAME	Route No.	PEARL CITY DIVISION ROUTE NAME
PH4	Kailua-Kahaluu-Pearl Harbor	A	City Express! A
PH6	Hawaii Kai-Pearl Harbor	C	Country Express! C
PH8	Pearl Harbor-Aloha Stadium	E	Country Express! E
W3	Kalihi via School Street Express	PH1	Waianae Coast-Pearl Harbor
1	Kalihi-Kahala	PH2	Mililani Town-Pearl Harbor
1L	Halawa-Hawaii Kai	PH3	Wahiawa Heights-Pearl Harbor
2	School-Waikiki-Kahala	PH7	Ewa Beach-Pearl Harbor
2L	*Kalihi-Waikiki-Kahala Limited*	W2	Waipahu via Paiwa Express
3	Kaimuki-Salt Lake	20	Waikiki-Aloha Stadium
4	Nuuanu-Punahou-McCully	40	Honolulu-Makaha
5	Ala Moana-Manoa	41	Kapolei-Ewa Beach
6	Pauoa-Woodlawn	42	Ewa Beach-Waikiki
7	Kalihi Valley-Kahala	43	Waipahu-Waiawa
8	Makiki-Ala Moana-Waikiki	44	Waipahu-Ewa Beach
9	Kaimuki-Pearl Harbor	46	Kapolei Commons-UH West Oahu
9s*	Palolo Valley	51	Honolulu-Wahiawa
10	Kalihi-Alewa Heights	52	Honolulu-Mililani-Haleiwa
11	Makalapa-Halawa-Aiea Heights	53	Honolulu-Pacific Palisades
13	Liliha-Waikiki-University	84	Mililani Express-North
14	St. Louis-Maunalani	88	Kahaluu-Ahuimanu Express
18	University-Ala Moana	88A	North Shore Express
24	Kapahulu – Aina Haina	90	Pearl City Express
23	Kahala-Sea Life Park	92	Makakilo City Express
32	Kalihi Transit Center-Foster Village-Pearlridge	93	Waianae Coast Express-CBD
61	Kalihi-Kaneohe-Aikahi	95	Kapolei Homesteads Express
66	Downtown-Kailua-Aikahi	96	Waipio Gentry Express
67	Honolulu-Kailua-Waimanalo	99	Wahiawa-Mililani-Waipahu-Kapolei
69	Kaneohe-Waimanalo-Sea Life	401	Waianae Valley
80	Hawaii Kai Park & Ride Express	402	Lualualei Homestead
82	Hawaii Kai Park & Ride Express	403	Nanakuli-Maili-Waianae
83	Wahiawa Town Express	411	Makakilo Heights
84A	Mililani Express-South	413	Campbell Industrial Park
85	Windward Express-Kaneohe	414	Palahia-Makakilo-Kapolei
86	Windward Express-Haiku	415	Kapolei Transit Center-Kalaeloa
87	Windward Express-Kailua	416	Kapolei Circulator
89	Waimanalo-Kailua Express	432	East-West Waipahu
97	Village Park Express	433	Waipahu-Waikele Shopping Center
98	Wahiawa-Mililani Park & Ride	444*	Hoaeae-Village Park-Royal Kunia
98A	Wahiawa-Mililani Transit	461	Makakilo-Palahia-UH West Oahu
102	Makiki via Keeaumoku	501	Mililani Mauka
121	Nuuanu-Alapai Transit Center	503	Mililani-Launani Valley
122	Punchbowl-Alapai Transit Center	504	Mililani South
123	Papakolea-Pacific Heights	511	Wahiawa-Schofield
151	*Chinatown-Kuakini-Kauluwela*	512	Wahiawa-Whitmore
200	Kapiolani Park-Palolo Valley	521	Waialua-Haleiwa
234	Kahala Mall-Waialae Nui	531	Manana-Pearl Highlands
301	Tripler-Kalihi Transit Center	532	Momilani-Pearl Highlands

302	Moanalua Valley-Kalihi Transit Center	533	Pacific Palisades
303	Hickam-Aiport-Kalihi Transit Center	535	Pearl City Peninsula-Pearl Highlands
306	Kahauiki Village	541	Wailuna-Pearlridge
307	*Kamehameha IV Rd-Kalihi Transit Center*	542	Royal Summit-Newtown-Pearlridge
551	Aiea Heights-Aloha Stadium	544	Upper Pearlridge-Pearlridge
552	Halawa Heights-Aloha Stadium	545	Pali Momi-Koauka-Pearlridge
651	Puohala-Windward City		
671	Kailua-Lanikai		
672	Kailua-Maunawili		
673	Kailua-Enchanted Lake		
674	Kailua-Aikahi		
KALIHI AND PEARL CITY DIVISION			
W1	Waipahu via Farrington	91	Ewa Beach Express
54	Honolulu-Pearl City	91A*	Ewa Gentry Express
60	Honolulu-Kaneohe-Haleiwa	94	Villages of Kapolei Express
65	Honolulu-Kaneohe-Ahuimanu	96A*	Paiwa-Waikele Express
81	Waipahu Express		

Discontinued

* Renumbered and/or restructured: Rt 9s was restructured and renumbered to Rt 200; Rt 434 was renumbered to Rt 444; Rt 101 was renumbered to Rt 91A; Rt 103 was renumbered to Rt 96A.

Italic = Reinstated or new route

Service Standards

A. Vehicle Loads

The purpose of the vehicle load standard is to define the comfort levels of crowding that are acceptable by mode and time period. DTS defines vehicle load factor as the ratio of passengers on board to the number of seats on a vehicle. There are a number of different types of vehicles in the TheBus fleet at any given time, and the fleet changes over time. Hence, the actual seating capacity and maximum number of passengers allowed by the comfort standards for each mode changes periodically.

DTS measures the passenger travel time (i.e., passenger hours) that experiences overcrowded conditions during each time period. The DTS standard is that no more than 10% of annual passenger travel time shall exceed the vehicle load factor standard for overcrowding. DTS evaluates routes that do not meet the 10% standard to address overcrowding.

Maximum vehicle load factors for all modes and periods are defined in the following table.

Maximum Vehicle Load Factor Standard					
	Weekday				Weekend
Service Mode	AM Peak (1st bus – 9am)	Base (9am – 2pm)	PM Peak (2pm – 6pm)	Night (6pm – last bus)	All Day
Rapid Bus	1.4	1.2	1.4	1.2	1.2
Trunk	1.4	1.2	1.4	1.2	1.2
Circulator	1.4	1.2	1.4	1.2	1.2
Peak Hour Express	1.2	NA	1.2	NA	1.2

TheBus fleet is comprised of vehicles differing in size and models. Routes are assigned vehicles in accordance with the Vehicle Assignment Policy. The maximum load standards for vehicle sizes with models that vary in seated capacity have been averaged to account for the difference:

Vehicle Size	No. of Models	No of Seats	Avg No. of Seats	1.2 Max Capacity	1.4 Max Capacity
30 feet	2	26	26	31	36
35 feet	3	30-35	33	39	46
40 feet high floor	1	45	45	54	63
40 feet low floor	16	36-38	37	44	51
60 feet	11	52-58	56	67	78

The vehicle load tables below show the percentage of sampled passenger hours that exceeded the maximum load factor standard per route for each service mode. TVI/EJ routes are noted with red font.

Rapid Bus Routes:
There are three (3) Rapid Bus routes: Zero (0) TVI/EJ, and three (3) non TVI/EJ route.

Rapid Bus					
Vehicle Load Standard	**1.4**	**1.2**	**1.4**	**1.2**	**1.2**
Route	**AM Peak (1st bus-9am)**	**Base (9am-2pm)**	**PM Peak (2pm-6pm)**	**Night (6pm-last bus)**	**Weekend (all day)**
A	0.9%	0.8%	0.8%	0.0%	0.0%
C	0.1%	0.0%	0.1%	0.0%	0.1%
E	0.2%	0.3%	0.2%	0.2%	2.1%

Trunk Routes:
There are 26 trunk routes: one (1) TVI/EJ routes, (25) non TVI/EJ routes.

Trunk					
Vehicle Load Standard	**1.4**	**1.2**	**1.4**	**1.2**	**1.2**
Route	**AM Peak (1st bus-9am)**	**Base (9am-2pm)**	**PM Peak (2pm-6pm)**	**Night (6pm-last bus)**	**Weekend (all day)**
1	0.1%	0.3%	0.1%	0.0%	0.0%
1L	0.2%	0.4%	0.2%	0.1%	0.2%
2	0.3%	0.4%	0.0%	0.0%	0.0%
2L	0.2%	0.1%	0.1%	0.1%	0.1%
3	0.0%	0.1%	0.0%	0.0%	0.0%
4	0.2%	0.0%	0.6%	0.6%	0.5%
6	0.2%	0.1%	0.2%	0.0%	0.1%
7	0.0%	0.1%	0.1%	0.0%	0.0%
9	0.0%	0.0%	0.0%	N/A	N/A
13	0.3%	1.3%	0.2%	0.1%	0.2%
20	0.1%	0.7%	0.1%	0.0%	0.1%
23	0.3%	0.3%	0.0%	0.0%	0.0%
40	0.3%	0.7%	0.0%	0.0%	0.2%
42	0.1%	0.8%	0.0%	0.0%	0.3%
43	0.0%	0.3%	0.4%	0.0%	0.2%
51	0.1%	0.2%	0.0%	0.0%	0.0%
52	0.1%	0.0%	0.1%	0.0%	0.1%
53	0.0%	0.0%	0.5%	N/A	N/A
54	0.0%	0.0%	0.5%	0.0%	0.0%
60	0.1%	0.3%	0.0%	0.0%	0.0%
61	0.0%	0.0%	0.1%	0.0%	0.0%
65	0.0%	0.0%	0.1%	0.0%	0.1%
66	0.0%	0.0%	0.1%	0.0%	0.0%
67	0.0%	0.3%	0.0%	0.0%	0.0%
69	0.0%	0.0%	0.0%	0.0%	0.0%

Circulator Routes:
There are 56 circulator routes: Seven (7) TVI/EJ routes, (49) non TVI/EJ routes.

Circulator					
Vehicle Load Standard	**1.4**	**1.2**	**1.4**	**1.2**	**1.2**
Route	**AM Peak (1st bus-9am)**	**Base (9am-2pm)**	**PM Peak (2pm-6pm)**	**Night (6pm-last bus)**	**Weekend (all day)**
5	0.0%	0.0%	0.0%	0.0%	0.0%
8	0.1%	0.2%	0.9%	0.1%	0.1%
9s	0.0%	0.0%	0.0%	0.0%	0.0%
10	0.0%	0.0%	0.0%	0.0%	0.1%
11	0.0%	N/A	0.0%	0.0%	0.0%
14	0.0%	0.1%	0.3%	0.0%	0.0%
18	0.0%	0.0%	0.0%	0.0%	0.0%
24	0.0%	0.0%	0.0%	0.0%	0.0%
32	0.0%	0.0%	0.0%	0.0%	0.0%
41	0.0%	0.0%	0.0%	0.0%	0.0%
44	0.0%	0.0%	0.0%	0.0%	0.0%
46	0.0%	N/A	0.0%	N/A	N/A
102	0.0%	0.0%	0.0%	0.0%	0.0%
121	0.0%	0.0%	0.0%	0.0%	0.0%
122	0.0%	0.0%	0.0%	0.0%	0.0%
123	0.0%	0.0%	0.0%	0.0%	0.0%
151	0.0%	0.0%	0.0%	0.0%	0.0%
200	0.0%	N/A	0.0%	N/A	N/A
234	0.0%	0.0%	0.1%	0.0%	0.0%
301	0.0%	0.0%	1.5%	0.0%	0.0%
302	0.0%	0.0%	0.0%	0.0%	0.0%
303	0.0%	0.0%	0.1%	0.0%	0.0%
306	0.0%	0.3%	0.8%	0.0%	0.0%
307	0.0%	0.0%	0.2%	0.0%	0.0%
401	0.0%	0.0%	0.0%	0.0%	0.0%
402	0.0%	0.0%	0.0%	0.0%	0.0%
403	0.0%	0.7%	3.2%	0.0%	0.0%
411	0.0%	0.0%	0.0%	0.0%	0.1%
413	0.0%	N/A	0.0%	0.0%	0.0%
414	0.0%	0.0%	0.0%	0.0%	0.0%
415	0.0%	0.0%	0.0%	0.0%	0.0%
433	0.0%	0.1%	0.3%	0.0%	0.0%
444	0.0%	0.0%	0.0%	0.0%	0.0%
461	0.0%	0.0%	0.1%	0.0%	0.0%
501	0.0%	0.0%	1.5%	0.0%	0.0%
503	0.0%	0.0%	0.0%	0.0%	0.0%
504	0.0%	0.0%	0.0%	0.0%	0.0%

Circulator (continued)					
Vehicle Load Standard	**1.4**	**1.2**	**1.4**	**1.2**	**1.2**
Route	**AM Peak (1st bus-9am)**	**Base (9am-2pm)**	**PM Peak (2pm-6pm)**	**Night (6pm-last bus)**	**Weekend (all day)**
511	3.6%	0.4%	5.8%	0.0%	0.0%
512	0.0%	0.0%	0.0%	0.0%	0.0%
521	0.0%	0.0%	0.0%	0.0%	0.0%
531	0.0%	0.0%	0.0%	0.0%	0.0%
532	0.1%	0.3%	1.3%	0.0%	0.0%
533	N/A	N/A	N/A	N/A	0.0%
535	0.0%	0.0%	0.0%	0.0%	0.0%
541	0.0%	0.0%	0.0%	0.0%	0.0%
542	0.0%	0.0%	0.0%	0.0%	0.0%
544	0.0%	0.0%	0.0%	0.0%	0.0%
545	0.0%	0.0%	0.0%	0.0%	0.0%
551	0.0%	0.1%	0.0%	0.0%	0.0%
552	0.0%	0.0%	0.0%	0.0%	0.0%
651	0.0%	0.0%	0.0%	0.0%	0.0%
671	0.0%	0.0%	0.0%	0.0%	0.0%
672	0.0%	0.0%	0.0%	0.0%	0.0%
673	0.0%	0.0%	0.0%	0.0%	0.0%
674	0.0%	0.0%	0.0%	0.0%	0.0%

Peak Express Routes:
There are 36 Peak Express routes: one (1) TVI/EJ routes, (35) non TV/EJ routes.

Peak Express					
Vehicle Load Standard	**1.2**	**NA**	**1.2**	**NA**	**1.2**
Route	**AM Peak (1st bus-9am)**	**Base (9am-2pm)**	**PM Peak (2pm-6pm)**	**Night (6pm-last bus)**	**Weekend (all day)**
80	0.0%		0.0%	N/A	N/A
81	0.3%		0.0%	N/A	N/A
82	0.0%		0.0%	N/A	N/A
83	0.0%		0.0%	N/A	N/A
84	0.0%		0.0%	N/A	N/A
84A	0.0%		0.0%	N/A	N/A
85	0.0%		0.0%	N/A	N/A
86	0.0%		0.0%	N/A	N/A
87	0.0%		0.0%	N/A	N/A
88	0.0%		0.0%	N/A	N/A
88A	0.0%		0.0%	0.0%	N/A
89	0.0%		0.0%	N/A	N/A
90	0.0%		0.0%	N/A	N/A
91	0.0%		0.2%	N/A	N/A
91A	0.0%		0.0%	N/A	N/A
92	0.0%		0.0%	N/A	N/A
93	0.0%		0.0%	0.0%	N/A
94	0.0%		0.0%	N/A	N/A
95	0.0%		0.0%	N/A	N/A
96	0.0%		0.0%	N/A	N/A
96A	0.2%		0.0%	N/A	N/A
97	0.0%		0.0%	N/A	N/A
98	0.0%		0.0%	N/A	N/A
98A	0.0%		0.0%	N/A	N/A
99	0.0%		0.0%	N/A	N/A
PH1	0.0%		0.0%	N/A	N/A
PH2	0.0%		0.0%	N/A	N/A
PH3	0.0%		0.0%	N/A	N/A
PH4	0.0%		0.0%	N/A	N/A
PH6	0.0%		0.0%	N/A	N/A
PH7	0.0%		0.0%	N/A	N/A
PH8	0.0%		0.0%	N/A	N/A
W1	0.8%		1.9%	N/A	2.1%
W2	0.2%		0.0%	N/A	0.0%
W3	0.3%		0.1%	N/A	0.5%

B. Vehicle Headways

Vehicle headway is defined as amount of time between two vehicles traveling in the same direction on the same route. Scheduling headway across service modes and time periods is affected by the following factors, including but not limited to: ridership, route length, traffic congestion/conditions, population density, demand generators, and budget constraints.

There is no headway standard for Peak Hour Express; headway is scheduled to meet demand.

Vehicle Headway Standard (in minutes)					
	Weekday				Weekend
Service Mode	AM Peak (1st bus – am)	Base (9am – 2pm)	PM Peak (2pm – 6pm)	Night (6pm – last bus)	All Day
Rapid Bus	15-30	15-40	10-30	15-50	20-60
Trunk	10-60	10-60	10-50	20-60	20-60
Circulator	20-60	20-60	20-60	30-60	30-60
Peak Hour Express	D	NA	D	D	D

D: As appropriate to meet demand

Vehicle headways for bus routes are detailed in the following tables according to time periods (AM/PM Peak, Base, Night, Weekend) and service modes (Rapid Bus, Trunk, Circulator, Peak Hour Express). If there is only a single trip, there is no headway. TVI/EJ routes are highlighted in red. DTS reviews routes with non-conforming scheduled headways and adjusts accordingly to ensure general conformance to the vehicle headway standard. There are some routes that may not adhere to the general standard as they may be exceptions affected by the factors mentioned previously.

Rapid Bus: There are three (3) routes: Zero (0) TVI/EJ; three (3) non TVI/EJ.

Rapid Bus					
Standard (minutes)	15-30	15-40	10-30	15-50	20-50
Route	AM Peak (1st bus – 9am)	Base (9am – 2pm)	PM Peak (2pm – 6pm)	Night (6pm – last bus)	Weekend All Day
A	12	15	10	15	20
C	32	28	30	42	33
E	26	31	29	34	60

Trunk: There are 26 routes: One (1) TVI/EJ; (25) non TVI/EJ.

Trunk					
Standard (minutes)	**10-60**	**10-60**	**10-50**	**20-60**	**20-60**
Route	**AM Peak (1st bus – 9am)**	**Base (9am – 2pm)**	**PM Peak (2pm – 6pm)**	**Night (6pm – last bus)**	**Weekend All Day**
1	11	10	10	24	23
1L	27	29	30	30	17
2	15	16	12	21	17
3	14	15	13	30	26
4	27	25	22	40	34
6	24	25	25	31	34
7	17	28	20	37	37
9	34	45	43	42	47
11	60	60	62	112	63
13	18	15	15	34	21
20	22	24	24	27	29
23	63	62	48	62	58
40	23	27	27	22	29
42	25	30	32	32	30
43	21	20	20	21	30
51	16	27	29	37	29
52	33	30	30	48	41
53	57	66	35	55	N/A
54	23	29	27	55	36
60	24	29	30	62	39
61	27	30	26	53	48
65	32	60	46	67	59
66	28	30	26	57	47
67	25	29	27	56	39
69	55	60	51	58	61

Circulator: There are 56 routes: Seven (7) TVI/EJ; (49) non TVI/EJ.

Circulator					
Standard (minutes)	**20-60**	**20-60**	**20-60**	**30-60**	**30-60**
Route	**AM Peak (1st bus – 9am)**	**Base (9am – 2pm)**	**PM Peak (2pm – 6pm)**	**Night (6pm – last bus)**	**Weekend All Day**
5	48	55	55	50	52
8	22	20	20	20	20
9S	31	30	30	30	30
10	60	76	59	68	69
14	21	29	23	26	29
18	74	65	68	66	50
24	55	66	59	34	54
32	59	60	63	57	58
41	49	61	40	58	61
44	56	66	56	79	68
46	10	10	10	10	10
102	32	33	33	32	29
121	60	60	60	60	N/A
122	30	30	30	30	30
123	60	60	40	58	59
151	30	30	30	30	30
200	30	30	30	30	30
234	One Trip	N/A	One Trip	N/A	N/A
301	36	40	40	40	29
302	36	N/A	One Trip	N/A	N/A
303	60	60	64	64	59
306	60	N/A	60	One Trip	40
307	38	40	44	43	40
401	60	66	65	58	61
402	60	66	65	57	61
403	60	66	64	57	61
411	45	60	45	51	57
413	29	N/A	37	N/A	N/A
414	40	42	45	40	42
415	30	30	32	One Trip	60
416	60	60	60	57	60
432	16	18	17	18	19
433	41	34	30	56	49
444	30	30	26	39	39

Circulator (continued)					
Standard (minutes)	**20-60**	**20-60**	**20-60**	**30-60**	**30-60**
Route	**AM Peak (1st bus – 9am)**	**Base (9am – 2pm)**	**PM Peak (2pm – 6pm)**	**Night (6pm – last bus)**	**Weekend All Day**
461	60	60	60	60	60
501	35	47	50	44	59
503	57	60	54	60	58
504	51	50	50	50	51
511	70	72	74	51	60
512	68	74	75	200	45
521	53	60	60	One Trip	45
531	60	60	60	60	59
532	60	60	52	60	60
533	N/A	N/A	N/A	N/A	61
535	57	60	60	60	58
541	60	60	60	56	58
542	59	60	60	59	59
544	60	60	60	60	60
545	60	60	60	58	59
551	30	30	30	30	30
552	30	30	30	30	30
651	35	40	40	42	39
671	34	36	36	36	39
672	62	56	61	56	64
673	38	38	40	35	44
674	62	56	60	55	64

Peak Express: There are 35 routes: One (1) TVI/EJ; (34) non TV/EJ.

Peak Express					
Standard (minutes)	**Demand**	**NA**	**Demand**	**Demand**	**Demand**
Route	**AM Peak (1st bus – 9am)**	**Base (9am – 2pm)**	**PM Peak (2pm – 6pm)**	**Night (6pm – last bus)**	**Weekend All Day**
80	42		55		
81	16		21		
82	30		One Trip		
83	28		23		
84	60		60		
84A	60		90		
85	19		One Trip		
86	20		30		
87	14		29		
88	25		One Trip		
88A	32		40	36	
89	38		40		
90	30		30		
91	21		23		
91A	23		30		
92	15		45		
93	17		25	One Trip	
94	16		45		
95	39		70		
96	30		40		
96A	20		25		
97	17		30		
98	45		60		
98A	40		40		
99	90		60		
PH1	One Trip		One Trip		
PH2	One Trip		One Trip		
PH3	One Trip		One Trip		
PH4	One Trip		One Trip		
PH6	One Trip		One Trip		
PH7	One Trip		One Trip		
PH8	6		4		
W1	12		13		13
W2	20		25		28
W3	30		30		30

C. On-Time Performance

The average measure of runs completed as scheduled:

- On-time is measured as 2 minutes early to 5 minutes late of scheduled arrival and departure times.
- Early is greater than 2 minutes of the scheduled departure time.
- Late is greater than 5 minutes of the scheduled arrival time.

The Standard for all service modes is 80%.

On-time performance for bus routes are detailed in the following tables according to service modes and periods (Early Morning, AM Peak, Base, PM Peak, Night, and weekends-All Day). TVI/EJ routes are highlighted in red.

Rapid Bus: There are three (3) routes: zero (0) TVI/EJ; three (3) non TVI/EJ routes. DTS will evaluate non-conforming routes with additional analysis/monitoring to identify factors affecting on-time performance for mitigation purposes.

Rapid Bus						
Standard	**80%**	**80%**	**80%**	**80%**	**80%**	**80%**
Route	**Early Morning (12am – 6am)**	**AM Peak (6am – 9am)**	**Base (9am – 2pm)**	**PM Peak (2pm – 6pm)**	**Night (6pm-12am)**	**Weekend All Day**
A	91%	81%	89%	81%	90%	88%
C	83%	50%	61%	52%	69%	82%
E	92%	60%	60%	46%	73%	74%

Trunk: There are 26 routes: One (1) TVI/EJ routes; (25) non TVI/EJ routes. DTS will evaluate non-conforming routes with additional analysis/monitoring to identify factors affecting on-time performance for mitigation purposes.

Trunk						
Standard	**80%**	**80%**	**80%**	**80%**	**80%**	**80%**
Route	**Early Morning (12am – 6am)**	**AM Peak (6am – 9am)**	**Base (9am – 2pm)**	**PM Peak (2pm – 6pm)**	**Night (6pm-12am)**	**Weekend All Day**
1	77%	53%	61%	50%	60%	70%
1L	72%	54%	79%	69%	68%	85%
2	75%	50%	47%	51%	64%	70%
2L	N/A	75%	66%	67%	74%	N/A
3	82%	61%	66%	57%	61%	71%
4	71%	56%	54%	59%	58%	70%
6	96%	81%	71%	59%	70%	65%
7	81%	58%	47%	42%	67%	71%
9	95%	67%	61%	63%	76%	71%
11	N/A	79%	77%	59%	75%	75%
13	82%	63%	68%	60%	78%	71%
20	65%	62%	47%	60%	62%	51%
23	95%	74%	85%	73%	72%	68%
40	75%	49%	58%	54%	61%	68%
42	65%	52%	54%	58%	56%	57%
43	63%	43%	49%	29%	68%	60%
51	89%	75%	78%	64%	63%	80%
52	92%	74%	77%	56%	66%	80%
53	65%	55%	67%	62%	67%	N/A
54	86%	67%	74%	60%	83%	77%
60	79%	81%	65%	65%	71%	64%
61	87%	76%	75%	68%	75%	72%
65	89%	72%	70%	74%	77%	80%
66	81%	73%	75%	75%	77%	78%
67	85%	78%	75%	69%	76%	76%
69	N/A	87%	79%	76%	82%	81%

Circulator: There are 56 routes: seven (7) TVI/EJ routes; (49) non TVI/EJ routes. DTS will evaluate non-conforming routes with additional analysis/monitoring to identify factors affecting on-time performance for mitigation purposes.

Circulator						
Standard	**80%**	**80%**	**80%**	**80%**	**80%**	**80%**
Route	**Early Morning (12am – 6am)**	**AM Peak (6am – 9am)**	**Base (9am – 2pm)**	**PM Peak (2pm – 6pm)**	**Night (6pm-12am)**	**Weekend All Day**
5	95%	86%	88%	81%	85%	93%
8	88%	76%	71%	63%	66%	61%
9s	84%	81%	93%	92%	91%	87%
10	94%	69%	40%	36%	78%	86%
14	85%	80%	74%	81%	73%	72%
18	N/A	81%	76%	43%	51%	65%
24	N/A	76%	75%	46%	44%	64%
32	8%	54%	71%	62%	73%	84%
41	95%	76%	87%	83%	82%	83%
44	77%	70%	84%	73%	85%	80%
46	97%	85%	81%	66%	91%	87%
102	N/A	90%	82%	57%	79%	66%
121	84%	79%	82%	76%	78%	81%
122	69%	72%	72%	79%	83%	93%
123	92%	64%	69%	48%	55%	82%
151	94%	49%	15%	34%	66%	81%
200	84%	51%	71%	48%	68%	73%
234	N/A	93%	N/A	53%	N/A	N/A
301	77%	75%	67%	66%	60%	85%
302	100%	79%	N/A	85%	85%	N/A
303	91%	59%	67%	63%	83%	77%
306	76%	75%	N/A	51%	84%	78%
307	90%	62%	68%	36%	60%	90%
401	98%	95%	94%	98%	90%	96%
402	80%	89%	76%	86%	69%	77%
403	94%	75%	74%	78%	87%	77%
411	96%	85%	95%	79%	94%	91%
413	57%	65%	N/A	79%	N/A	N/A
414	86%	80%	82%	73%	78%	77%
415	98%	85%	91%	84%	100%	93%
416	100%	85%	97%	86%	96%	94%
432	85%	89%	97%	92%	90%	84%
433	59%	43%	76%	47%	66%	82%

Circulator (continued)						
Standard	**80%**	**80%**	**80%**	**80%**	**80%**	**80%**
Route	**Early Morning (12am – 6am)**	**AM Peak (6am – 9am)**	**Base (9am – 2pm)**	**PM Peak (2pm – 6pm)**	**Night (6pm-12am)**	**Weekend All Day**
444	69%	86%	81%	70%	56%	73%
461	98%	97%	92%	88%	91%	84%
501	90%	90%	90%	79%	79%	85%
503	97%	93%	89%	91%	88%	91%
504	91%	97%	93%	79%	90%	84%
511	53%	53%	69%	58%	69%	76%
512	95%	59%	75%	49%	75%	90%
521	N/A	98%	97%	98%	97%	92%
531	81%	75%	73%	54%	71%	74%
532	90%	74%	73%	52%	64%	78%
533	N/A	N/A	N/A	N/A	N/A	82%
535	98%	88%	85%	84%	84%	81%
541	79%	80%	73%	67%	64%	75%
542	86%	70%	90%	91%	94%	75%
544	81%	92%	86%	93%	91%	80%
545	66%	75%	71%	66%	69%	69%
551	84%	89%	90%	85%	86%	79%
552	94%	98%	97%	81%	90%	71%
651	85%	53%	61%	55%	66%	71%
671	N/A	52%	48%	79%	93%	80%
672	N/A	71%	66%	68%	71%	77%
673	70%	86%	61%	35%	77%	78%
674	N/A	80%	76%	84%	77%	71%

Peak Express: There are 35 routes: one (1) TVI/EJ routes; (34) non TV/EJ routes. DTS will evaluate non-conforming routes with additional analysis/monitoring to identify factors affecting on-time performance for mitigation purposes.

Peak Express						
Standard	**80%**	**80%**	**80%**	**80%**	**80%**	**80%**
Route	**Early Morning (12am – 6am)**	**AM Peak (6am – 9am)**	**Base (9am – 2pm)**	**PM Peak (2pm – 6pm)**	**Night (6pm-12am)**	**Weekend All Day**
80	N/A	71%	N/A	93%	90%	N/A
81	89%	67%	N/A	81%	85%	N/A
82	100%	100%	N/A	88%	N/A	N/A
83	83%	67%	N/A	67%	46%	N/A
84	97%	100%	N/A	64%	75%	N/A
84A	68%	98%	N/A	74%	90%	N/A
85	N/A	85%	N/A	68%	N/A	N/A
86	N/A	93%	N/A	77%	N/A	N/A
87	N/A	83%	N/A	83%	N/A	N/A
88	N/A	81%	N/A	82%	N/A	N/A
88A	70%	73%	N/A	30%	35%	N/A
89	100%	98%	N/A	92%	N/A	N/A
90	N/A	94%	N/A	80%	N/A	N/A
91	80%	63%	N/A	78%	40%	N/A
91A	85%	74%	N/A	73%	75%	N/A
92	100%	86%	N/A	76%	72%	N/A
93	80%	66%	N/A	84%	81%	N/A
94	93%	85%	N/A	78%	74%	N/A
95	100%	86%	N/A	85%	70%	N/A
96	100%	98%	N/A	68%	79%	N/A
96A	88%	95%	N/A	76%	N/A	N/A
97	89%	97%	N/A	72%	85%	N/A
98	97%	90%	N/A	56%	80%	N/A
98A	97%	89%	N/A	58%	75%	N/A
99	75%	96%	N/A	74%	85%	N/A
W1	57%	68%	N/A	74%	70%	47%
W2	92%	96%	N/A	50%	N/A	78%
W3	100%	91%	N/A	59%	N/A	75%
PH1	98%	N/A	N/A	81%	N/A	N/A
PH2	96%	93%	N/A	75%	N/A	N/A
PH3	89%	85%	N/A	83%	N/A	N/A
PH4	93%	89%	N/A	65%	N/A	N/A

Peak Express (continued)						
Standard	**80%**	**80%**	**80%**	**80%**	**80%**	**80%**
Route	**Early Morning (12am – 6am)**	**AM Peak (6am – 9am)**	**Base (9am – 2pm)**	**PM Peak (2pm – 6pm)**	**Night (6pm-12am)**	**Weekend All Day**
PH6	66%	N/A	N/A	78%	N/A	N/A
PH7	90%	91%	N/A	85%	N/A	N/A
PH8	94%	90%	N/A	84%	N/A	N/A

D. Service Availability

A general measure of the distribution of routes within an agency's service area.

Standard:
Route availability within a ½ mile radius for 80% of the population.

Service availability for bus routes are detailed in the following table:

Service Availability (within a ½ mile radius of a bus route)						
Category	**Over ½ mile**	**Within ½ mile**	**Total**	**Over ½ mile**	**Within ½ mile**	**Total**
Non-TVI/EJ	2,000	886,100	888,100	0.2%	99.8%	100%
TVI/EJ	1,900	190,000	191,900	1%	99%	100%
Total	**3,900**	**1,076,100**	**1,080,000**	**0.3%**	**99.6%**	**100%**

Source: 2020 Census Data

99% of TVI/EJ and 99.8% of non-TVI/EJ residents are within the ½ mile radius of a bus route. Overall, 99.6% of all residents are within the ½ mile radius of a bus route.

Service Policies

A. Transit Amenities

Items of comfort, convenience, and safety (seating, shelter, trash receptacles, lighting).

Policy:

- All amenities shall comply with ADA Accessibility Guidelines (ADAAG)
- Installation at stops along bus routes are based on number of passenger boardings, number of routes served, transfer point, headways, and space requirements.

Amenities	Stop Characteristics for Distribution
Shelter	Transfer points, two or more bus routes, headways >40 minutes, average to high proportion of passenger boardings in relation to route ridership
Bench	Transfer points, two or more bus routes, headways >30 minutes, average proportion of passenger boardings in relation to route ridership
Trash Receptacle	Transfer points, two or more bus routes, headways >15 minutes, medium to high proportion of passenger boardings in relation to route ridership and/or adjacent to trash receptacle use generator(s)
Provision of Information	As needed and appropriate

Trash receptacles, shelters, benches, and lighting were tallied for each stop along a single route. Transit amenity distribution averages for TVI/EJ and non-TVI/EJ routes for each mode are detailed in the following tables. Service area may be a factor in determining the quantity of amenities along each route. TVI/EJ routes are highlighted in red.

Rapid Bus: There are three (3) routes: Zero TVI/EJ; three (3) non TVI/EJ routes

Rapid Bus						
Route	No. of Stops	Trash Receptacle (%)	Shelters (%)	Benches (%)	Shelter Lighting (%)	Street Lighting (%)
A	40	88	88	90	8	80
C	134	71	61	80	2	88
E	61	85	74	89	5	79

Trunk: There are 26 routes: One (1) TVI/EJ routes; (25) non TVI/EJ routes. Compared to other Trunk routes, the distribution of amenities is comparable between the TVI/EJ route and non TVI/EJ routes.

Trunk						
Route	No. of Stops	Trash Receptacle (%)	Shelters (%)	Benches (%)	Shelter Lighting (%)	Street Lighting (%)
1	219	54	44	76	3	95
1L	207	43	32	68	1	95
2	144	78	63	93	4	93
2L	76	72	62	92	4	92
3	120	71	63	85	4	88
4	94	61	52	86	1	84
6	131	47	47	78	3	91
7	179	52	46	74	1	85
9	201	65	61	77	3	75
11	116	28	33	59	1	67
13	144	69	63	94	3	90
20	122	75	73	93	2	86
23	119	21	16	60	1	87
40	324	58	56	77	2	86
42	234	78	72	94	3	89
43	66	27	32	76	0	98
51	229	69	63	83	5	93
52	160	82	77	94	6	94
53	107	55	57	88	2	95
54	148	32	43	68	1	97
60	381	35	33	69	2	93
61	115	47	42	76	1	96
65	108	59	64	81	3	94
66	79	51	58	87	0	90
67	136	52	51	79	3	92
69	89	48	38	75	1	92

Circulator: There are 56 routes: seven (7) TVI/EJ routes; (49) non TVI/EJ routes. Compared to other Circulator routes, the distribution of amenities is comparable between the TVI/EJ and non TVI/EJ routes.

Circulator						
Route	No. of Stops	Trash Receptacle (%)	Shelters (%)	Benches (%)	Shelter Lighting (%)	Street Lighting (%)
5	61	31	30	56	3	92
8	50	74	64	86	0	84
9s	31	32	32	84	0	90
10	127	16	13	38	0	93
14	172	27	23	52	0	95
18	56	68	54	93	2	91
24	87	43	39	70	1	80
32	95	29	25	53	1	80
41	64	41	33	81	0	73
44	117	26	31	59	0	87
46	30	43	30	70	0	83
102	24	38	42	83	4	92
121	70	40	46	73	1	67
122	22	64	50	82	5	68
123	105	9	10	34	1	90
151	21	43	43	57	0	52
200	74	41	38	72	0	77
234	31	29	19	29	0	100
301	34	18	26	32	6	74
302	26	23	19	27	4	65
303	52	40	46	50	4	50
306	29	34	31	69	7	76
307	43	58	44	74	2	74
401	55	16	20	36	0	91
402	39	10	8	49	0	79
403	80	14	15	35	0	75
411	57	28	21	74	0	91
413	25	24	16	28	0	84
414	32	19	19	53	0	100
415	10	50	40	60	0	60
416	41	20	20	22	2	54
432	62	26	34	81	2	97
433	58	47	52	72	2	100
444	27	67	48	74	0	96

461	42	31	26	67	0	95
501	34	21	21	38	3	100
503	45	20	18	31	2	98
504	40	5	10	18	3	100
511	28	71	64	93	18	100
512	36	39	42	83	11	100
521	50	30	32	66	2	78
531	23	22	13	48	0	70
532	31	23	19	48	0	74
533	50	24	30	76	0	96
535	26	15	23	58	0	8
541	40	15	33	58	0	73
542	44	16	18	30	2	91
544	31	10	3	23	0	87
545	8	50	38	63	0	38
551	36	8	14	50	0	97
552	26	8	15	46	0	85
651	44	34	25	57	0	98
671	32	28	22	41	0	97
672	40	30	23	33	0	85
673	42	29	24	50	0	93
674	18	17	22	28	6	89

Peak Express: There are 35 routes: One (1) TVI/EJ routes; (34) non TV/EJ routes. Compared to other Peak Express Routes, the distribution of amenities is comparable between the TVI/EJ route and non TVI/EJ routes.

Peak Express						
Route	No. of Stops	Trash Receptacle (%)	Shelters (%)	Benches (%)	Shelter Lighting (%)	Street Lighting (%)
80	122	34	20	52	2	97
81	81	42	47	83	2	98
82	82	30	27	57	5	95
83	147	52	49	73	5	90
84	71	51	52	55	4	96
84A	69	58	59	65	6	97
83	147	52	49	73	5	90
84	71	51	52	55	4	96
84A	69	58	59	65	6	97
85	85	46	47	75	2	96
86	47	77	70	91	4	94
87	83	40	31	59	4	86
88	49	45	45	71	4	96
88A	436	42	40	75	3	92
89	70	50	44	79	4	90
90	69	45	54	72	3	97
91	56	82	80	93	4	88
91A	59	53	51	68	3	97
92	51	47	43	80	4	88
93	146	55	51	68	1	82
94	45	56	51	69	4	91
95	52	52	48	58	6	92
96	36	67	67	81	6	94
96A	30	83	83	83	7	93
97	32	81	66	75	6	94
98	46	65	67	78	4	96
98A	46	87	89	96	9	96
99	90	61	60	74	9	94
W1	72	76	69	93	1	92
W2	44	45	34	84	0	98
W3	43	77	49	86	5	93
PH1	73	52	49	66	0	85
PH2	79	23	27	30	0	92
PH3	102	56	45	63	5	95

Peak Express (continued)						
Route	No. of Stops	Trash Receptacle (%)	Shelters (%)	Benches (%)	Shelter Lighting (%)	Street Lighting (%)
PH4	81	35	41	57	1	89
PH6	129	34	21	55	1	95
PH7	54	63	61	74	0	81
PH8	25	36	44	48	0	68

B. Vehicle Assignment

Transit vehicles are assigned to routes not based off the profile of riders or communities, but rather their assignments are based on the operating characteristics of the routes such as ridership, mode of service, and roadway conditions (narrow, steep, tight turns). Thus, the vehicle capabilities are considered carefully. Typically, 60-foot buses are assigned to Rapid Bus, high ridership, or long-distance routes; 40-foot buses to trunk and circulator routes; and 30/35-foot buses to circulator/community access routes, routes with narrow or steep streets/tight turns, and routes with less ridership. Vehicle assignments are subject to change throughout the year depending on operations, maintenance, modification of routes, technological needs, and other factors. All buses are wheelchair accessible and equipped with bike racks.

Electric buses are limited by its proximity to charging station. Currently, TheBus fleet only has 40-foot buses that are used within its Kalihi bus facility (the only facility with charging stations as of 2025) and are limited to selected routes based off charging time, distances and other factors. Because of these limitations, electric buses are used on routes that are assigned to this facility. They are fairly recent with newer models (2020 and newer) procured.

High floor (HF) buses are no longer manufactured and OTS no longer purchases them anymore (the last being procured in 2003). There are only nine HF buses in service and they are projected to be phased out by June 2025. While older in age, HF buses are equipped with lifts and have greater seating capacity than newer low floor buses; and are generally assigned to routes with the following characteristics:

- High ridership routes with segments that are unable to accommodate 60-foot buses.
- Unimproved right-of-ways where lifts are more conducive.
- Areas prone to ponding or flooding conditions.
- Long distance routes where the seating capacity of low floor buses is insufficient to accommodate the ridership.
- The routes that occasionally may use but are not limited to the nine remainder HF buses are Routes 93, A, 40, C, 42, PH3, & Ph7 (non-TVI/EJ routes).

A comparison of vehicle size, number of vehicles, and age from the August 2024 vehicle assignment log for TVI/EJ and non-TVI/EJ routes for each mode are detailed in the following tables below. TVI/EJ routes are highlighted in red. A range of vehicle ages for each route (keep in mind some routes are interlined or are discontinued and may show “N/A” on this list to avoid double counting) are used instead of averages in these tables because a variety of different models and their model year are interchanged with different routes. For estimates, an average was calculated from the sum of the total number of vehicles for each model year and the total number of years (broke down in months) A summary of the results are as follows:

Average fleet age:	11.78 years
Average TVI/EJ:	11.07 years
Average Non-TVI/EJ:	11.92 years

Rapid Bus: There are three (3) routes: Zero (0) TVI/EJ; three (3) non TVI/EJ routes. 60-foot vehicles are generally assigned to Rapid Bus routes because they have high ridership, connect outlying suburban areas to the primary urban core, and operate on heavily traveled corridors frequently throughout the day. 60-foot vehicles are no longer assigned to Route C due to the weight limitations of the Makaha Stream Bridge; this may be why the age range seems significantly older.

Rapid Bus			
Route	**Vehicle Size (ft)**	**No of Vehicles**	**Age Range (Years)**
A	40/60	51/8	2-21
C	40	36	10-21
E	40/60	2/31	2-21

Trunk: There are 26 routes: (1) TVI/EJ routes; (25) non TVI/EJ routes. 40-foot vehicles are typically assigned to Trunk routes, with 60-foot vehicles augmenting routes with high ridership and operating on heavily traveled corridors.

Trunk			
Route	**Vehicle Size (ft)**	**No of Vehicles**	**Age Range (Years)**
1	40/60	27/34	2-21
1L	40/60	5/39	2-21
2	40/60	1/62	2-21
2L	40/60	2/14	2-21
3	40	49	2-21
4	40	21	2-21
6	40	24	2-21
7	40	14	2-21
9	40	28	2-21
11	40	N/A	2-21
13	40	48	2-21
20	60	38	2-15
23	40	15	2-21
40	40/60	75/1	2-21
42	40/60	3/52	2-21
43	40	12	10-21
51	40	35	10-21
52	40	25	10-21
53	40	17	10-21
54	40	9	10-21
60	40	29	10-21
61	40	44	2-21
65	40	6	2-21
66	40	4	2-21
67	40	42	2-21
69	40	2	1-2

Circulator: There are 56 routes: Seven (7) TVI/EJ routes; (49) non TVI/EJ routes. 30, 35, and 40-foot vehicles are generally assigned to Circulator routes which travel through neighborhoods. Assignments are based upon ridership, roadway conditions, and time/distance. Note, "N/A" are attributed to being interlined or the route was discontinued.

Circulator			
Route	Vehicle Size (ft)	No of Vehicles	Age Range (Years)
5	40	4	2-21
8	40	20	2-21
9s	40	4	2-21
10	30/35	4/6	3-14
14	35	8	3-14
18	40	4	2-21
24	40	4	2-21
32	35	8	3-14
41	40	12	14-21
44	40	14	14-21
46	40	19	14-21
102	N/A	N/A	N/A
121	N/A	N/A	N/A
122	35	4	3-14
123	N/A	N/A	N/A
151	35	4	3-14
200	N/A	N/A	N/A
234	35/30	N/A	N/A
301	40	4	2-21
302	40	1	2-21
303	40	4	2-21
306	N/A	N/A	N/A
307	N/A	N/A	N/A
401	N/A	N/A	N/A
402	N/A	N/A	N/A
403	40	8	14-21
411	35	4	12
413	40	3	14-21
414	35	4	12
415	40	4	14-21
416	35	4	12
432	N/A	N/A	N/A
433	40	8	14-21
444	40	5	14-21

Circulator			
Route	Vehicle Size (ft)	No of Vehicles	Age Range (Years)
461	40	4	14-21
501	40	7	14-21
503	30	5	8
504	40	4	14-21
511	40	4	14-21
512	N/A	N/A	N/A
521	40	5	14-21
531	N/A	N/A	N/A
532	35/40	5	14-21
533	N/A	N/A	N/A
535	35	4	12
541	30	4	8
542	35	5	12
544	N/A	N/A	N/A
545	N/A	N/A	N/A
551	30	8	4
552	N/A	N/A	N/A
651	40	4	2-21
671	40	4	2-21
672	35	4	3-14
673	40	4	2-21
674	N/A	N/A	N/A

Peak Express: There are 35 routes: one (1) TVI/EJ routes; (34) non TV/EJ routes. 40-foot vehicles are generally assigned to Peak Express routes, with the exception of routes 81, 91, 91A, 97, W1 and W3 which are also assigned 60-foot vehicles due to higher ridership than other Peak Express routes.

Peak Express			
Route	**Vehicle Size (ft)**	**No of Vehicles**	**Age Range (Years)**
80	40	4	2-21
81	40/60	3/4	2-21
82	40	1	2-21
83	40	9	2-21
84	40	2	14-21
84A	40	2	2-21
85	40	3	2-21
86	40	4	2-21
87	40	5	2-21
88	40	4	14-21
88A	N/A	N/A	N/A
89	40	4	2-21
90	40	2	14-21
91	60	7	2-15
91A	60	3	2-15
92	40	2	14-21
93	40	12	14-21
94	40	4	14-21
95	40	5	14-21
96	40	2	14-21
96A	40	1	14-21
97	40/60	5/1	2-21
98	40	2	2-21
98A	40	4	2-21
99	40	1	14-21
W1	60	5	5-17
W2	N/A	N/A	N/A
W3	60	1	5-17
PH1	N/A	N/A	N/A
PH2	N/A	N/A	N/A
PH3	N/A	N/A	N/A
PH4	40	2	2-21
PH6	40	2	2-21
PH7	N/A	N/A	N/A
PH8	40	2	2-21

End of Attachment 7

Attachment 8

Major Service and Fare Change Policy and Disparate Impact & Disproportionate Burden Policies

CHAPTER: Transportation Mobility Division	INDEX CODE: 7-1.13
CATEGORY: Administration	**PAGE 1 of 4**
SUBJECT: **DTS Major Service and Fare Change Policy, Disparate Impact, and Disproportionate Burden Policies**	**Approved By: DTS Director Wes Frysztacki**
REFERENCES: Federal Transit Administration (FTA) C 4702.1B Title VI Requirements & Guidelines for FTA Recipients (or current version); FTA Comprehensive Review Guide for Triennial and State Management Reviews (current FY version)	**EFFECTIVE DATE:** **April 2, 2019**

PURPOSE: To establish policies and procedures to evaluate all major service and fare changes as required under the FTA Title VI (TVI) Circular 4702.1B and any subsequent revisions thereto. In order to comply with FTA requirements, DTS-TMD is required to develop and adopt Major Service Change, Fare Change, Disparate Impact, and Disproportionate Burden Policies and Procedures to evaluate the impact on minority and low-income populations.

POLICIES:

The DTS-TMD shall conduct service and fare equity analyses during the planning process to determine whether the adverse effects of major planned changes will have a disparate impact on minority populations on the basis of race, color, or national origin and/or a disproportionate burden on low-income populations. Adverse effects of major changes are measured by the change between existing and proposed service/fare levels that would be deemed significant, including but not limited to new service, reductions in trips/service hours, increases in fares/headways, and elimination of routes/route segments/bus stops.

1. Major Service Change Policy

   All "major" service changes will require a Service Equity Analysis for Title VI purposes during the planning process prior to implementation. Service change proposals that do not meet the criteria for "major" will be subject to an appropriate level of public review and comment. The combined effect of two or more service changes affecting the same route or community within a twelve month period or over four successive quarters and exceeds the disparate impact/disproportionate burden thresholds established in Item Nos. 3 and 4 below will be subject to a service equity analysis.

   The following are considered "major" service changes:

   - Establishing new routes when the population within a ½ mile radius of the proposed route exceeds 25% of the service area population (Census blocks).
   - Changing service levels (ie: trips, service hours/miles, span of service, headways) for existing routes when ridership of the affected route exceeds 10% of system-wide ridership.
   - Eliminating route(s) when the affected ridership is greater than ten (10) passengers and the percentage of affected ridership exceeds 10% of system-wide ridership. (No major service change will be considered if similar alternate service is available on another existing route.)

- Eliminating route segments when the affected ridership of the eliminated segment exceeds 10% of the route's total ridership.
- Temporary service addition or change lasting longer than twelve months.

The following service changes are not considered "major" and do not require Service Equity Analyses: Special event service, routing changes due to construction or other road closures, and special service operated during emergencies.

2. Fare Change Policy
   All fare changes (increase, decrease), except the following, will require a Fare Equity Analysis for Title VI purposes during the planning process and prior to implementation.
   - Special event, such as instances when fare-free has been declared for all passengers.
   - Temporary fare reductions that are mitigating measures for other actions, such as construction activities closing a segment of a rail system for a period of time, requiring passengers to alter their travel patterns. A reduced fare for these passengers is a mitigating measure.
   - Promotional fare reductions lasting less than six (6) months.

3. Disparate Impact Policy
   As defined by FTA:
   "Disparate impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks substantial legitimate justification and where 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.

   The policy shall establish a threshold for determining when adverse effects of fare/service changes are borne disproportionately by minority populations. The disparate impact defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by minority populations compared to impacts borne by non-minority populations. The disparate impact threshold must be applied uniformly… and cannot be altered until the next Title VI Program submission."

   DTS-TMD determines disparate impact when adverse effects of major service and/or fare changes disproportionately affects minority populations based on race, color, or national origin more than non-minority populations.

   A "disparate impact" occurs when the threshold for determining adverse effects of planned changes on minority populations exceeds a 10% difference between the proportion of the total minority and non-minority population or ridership and the proportion of the affected minority and non-minority population or ridership.

4. Disproportionate Burden Policy
   As defined by FTA in Circular 4702.1B:

"Disproportionate burden refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate where practicable.

The policy shall establish a threshold for determining when adverse effects of service or fare changes are borne disproportionately by low-income populations. The disproportionate burden threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by low-income populations as compared to impacts borne by non-low-income populations. The disproportionate burden threshold must be applied uniformly… and cannot be altered until the next Title VI Program submission."

DTS-TMD determines disproportionate burden when adverse effects of major service and/or fare changes disproportionately affects low-income populations more than non-low-income populations.

A "disproportionate burden" occurs when the threshold for determining adverse effects of planned changes on low-income populations exceeds a 10% difference between the proportion of the total low-income and non-low-income population or ridership and the proportion of the affected low-income and non-low-income population or ridership.

PROCEDURES:

1. Six months prior to approving or implementing any planned changes, DTS-TMD will evaluate the impacts of the change(s) on minority and/or low-income populations by conducting a service and/or fare equity analysis to determine if the adverse effects have a disparate impact or disproportionate burden. For service equity analyses, minority and low- income populations within ½ mile radius of the affected service area are determined using the most current available Census block group data. The fare equity analysis will use fare media data from ridership surveys conducted within the previous 5-year period.

2. Proposed service changes are submitted to DTS-TMD Service Review Committee for review and approval. Service changes are typically implemented on a quarterly basis in March, June, August, and December.

3. If the equity analysis determines that there is no disparate impact to the affected minority population and/or no disproportionate burden to the affected low-income population, DTS-TMD will continue the planning/implementation process of the proposed change. The process will include coordination with council member(s) from the district(s) affected by change(s) and presentation to the public for comments. Results will included in the TVI Program submitted to FTA every three years.

4. If the equity analysis determines that there is a disparate impact to the affected minority population and/or a disproportionate burden to the affected low-income

population, DTS-TMD will review/revise planned changes to avoid, minimize, or mitigate such impacts and conduct another equity analysis on the revised changes to determine that the revised changes do not disproportionately affect minority and/or low-income populations more than non-minority and/or non-low-income populations. Potential adverse effects to minority and/or low-income populations include but not limited to: service changes that reduce service (i.e. eliminate route(s) or segments of routes, remove trips on a route, change span of service), change the frequency of service (i.e. headway), or fare increases.

5. If DTS-TMD chooses not to alter the proposed changes despite the potential disparate impact and/or a disproportionate burden on minority/low-income populations, or if DTS-TMD finds, even after revisions, that minority/low-income riders will continue to bear a disproportionate share of the proposed changes, the change may be implemented only if:
    1. there is a substantial legitimate justification for the proposed change, **and**
2. it can be demonstrated that there are no alternatives that would have a less disparate impact on minority/low-income riders but would still accomplish legitimate program goals. In order to make this choice, DTS-TMD must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on minorities/low-income riders, and then implement the least discriminatory alternative.

PUBLIC ENGAGEMENT PROCESS:

See Public Participation for Changes in Public Transit Policy, Programs, Projects, Service, and Operations procedures (Index Code: 7-1.19) for identifying methods of engaging the public in the decision making process for any transportation plan, program, or activity. This applies when implementing major and minor service changes, fare changes, construction, development of policy thresholds, procedures, any future revision(s) or amendments(s), and is applicable to all sub-recipients.

Attachment 9

Major Service and Fare Change Equity Analyses

Post-June 2022

- Route U1 New Route (2022) and Route U1 Elimination (2023)
- Route 416 Reroute (2022)
- 2022 July Fare increase

2023

- 2023 Low Income Fare Program Change
- Route E Reroute
- Route 52 Reroute
- Route 2/2L Restructure
- Route 121 Elimination and Route 151 New Route
- Route 122 Segment Elimination
- Route 416 Segment Elimination and Reroute (2023)
- Route 434 Renumber and Restructure
- Route 433 Reroute
- BRIP routes:
    - Route C Restructure
    - Route 46 New Route
    - Route 461 New Route
    - Route 44 Restructure
    - Route 53 weekends only, replaced by New Route 533
    - Route 73 Elimination and replaced by New Routes 531, 532, 535
    - Route 71 replaced by New Routes 542, 544, 541, 545
    - Route A Restructure
    - Route 1L Restructure
    - Route 20 Restructure
    - Route 74 Elimination and replaced by New Routes 551, 552
    - Route PH8 New Route

2024

- Route 9 Elimination / Route 7 Restructure / Route 307 New Route
- Route 9s Restructure/ Route 20 Segment Elimination / Route 200 New Route
- Route 10 / Route 41 / Route123 Service Reduction
- Route 1L Reroute
- Route 11 Elimination
- Route 43 Restructure and Route 432 Elimination
- Route 303 Segment Elimination
- Route 18 Elimination
- Route 24 Elimination
- Route 23 Segment Elimination and Route Extension

2025

- Route 41 / Route 44 / Route 415 / Route 461 Restructure and Route 47 New Route
- 2025 July Fare increase

Post-June 2022

Department of Transportation Services (DTS)
Transportation Mobility Division Title VI Program
Service Equity Analysis Report
Route(s): U1 Campus Connector Express (Pilot) (2022)
U1 Campus Connector Express (Pilot Elimination) (2023)
Change(s): Establishing New Route and Elimination

Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. DTS' 2022 Public Transit Title VI Program identifies the policies and procedures used to determine whether service change proposals are considered "major" and to evaluate the impact of major service changes on minority and low income populations.

Background

This Report combines the initial proposal of establishing Route U1 (2022) and its proposed elimination (2023).

Route U1 connects island wide Express routes in Downtown to University of Hawaii at Manoa (UH) and Kapiolani Community College (KCC) by providing "Limited Stop" service. The communities it travels through include the areas of Downtown, Makiki, Moiliili, and Kaimuki. It operates on school days only.

The main goals of implementing this route are to test out a service that connects UH with KCC and downtown. In connecting these major destinations, there is also a secondary objective of connecting nearby educational institutions that are on route to them also.

After half a year of implementation, Route U1 is proposed to be eliminated due to low ridership in contrast to other alternative routes that more or less provide similar service.

These alternative routes are

- Route 3 Kaimuki/ Salt Lake
- Route 4 Nuuanu/Punahou/McCully
- Route 9 Kaimuki/Pearl Harbor
- Route A City Express! Waipahu/ Kalihi/ University of Hawaii Manoa

Keeping U1 would result in redundancy and is therefore recommended for elimination.

Proposed Changes

- Establish Route U1 (2022)
- Eliminate entire Route U1 service (2023)

Major Service Change Criteria

Based on the "Establishing New Routes" criteria for new bus service (Route U1) the proposed changes are considered a "major" service change requiring a Service Equity Analysis.

"Establishing new routes when the population within a ½ mile radius of the proposed route exceeds 25% of the service area population (Census blocks)."

Census blocks 2020	
Service Area Population:	149,108
New Route U1 population within ½ mile radius:	110,700 = 74%

Based on the following criteria, the proposal to discontinue Route U1 does not meet the criteria for a "major" service change, and therefore, does not trigger the requirement for a Service Equity Analysis.

> "Eliminating route(s) when the affected ridership is greater than ten (10) passengers and the percentage of affected ridership exceeds 10% of system-wide ridership. (No major service change will be considered if similar alternate service is available on another existing route.)"

Annual ridership FY 2022	
System-wide:	34,753,527
Route U1:	11,410 (3.3%)

Public Outreach Activities

Public outreach and participation are important components when planning service changes. Riders/public are encouraged to provide comments and suggestions via email, phone call, voicemail, and the website portal. Point of contact information is provided on all notifications to provide the public with various options to voice their comments. To elicit feedback on the proposed changes, the following outreach methods are utilized.

- Notification email and copies of Rider Notices to Honolulu City Council Members whose districts are affected by the proposals and the Transportation Committee Chair.
- Notification email and copies of Rider Notices to the Neighborhood Boards affected by the proposals. (Presentation to be made upon request)
- Onboard interaction with riders on the proposed changes.
- Media Notifications by DTS Public Information Specialist. (i.e. Press Release, Twitter, Instagram).
- Rider Notices posted at affected bus stops along affected routes.
- Onboard notification and distribution of Rider Notices by bus operators of affected routes.
- Distribution of Rider Notices to selected developments, businesses, facilities, residents, etc. affected by the proposals.

- Notifications on TheBus.org website and linked to the DTS website.
- Notification email and copies of Rider Notices are provided to the Department of Human Services/Division of Vocational Rehabilitation/Hoopono Services for the Blind for distribution and are in a format on the website to use low sight features.
- Informational material on the website are available in a format to use the translation feature. Translation of notices into a required language(s) will be provided on request, unless the service area's neighborhood board/bus drivers indicate that translated notices are needed for the limited English population.

Title VI Policies and Definitions

DTS' Title VI Program contains the policies and procedures to determine if service changes are considered "major" and to evaluate the impact of major service changes to minority and low income populations.

Major Service Change Policy: Eliminating a route segment is defined as major service change that requires DTS to perform a service equity analysis during the planning phase prior to implementation.

Disparate Impact Policy: DTS determines the occurrence of a disparate impact when adverse effects of a major service change disproportionately affects minority populations by more than 10% based on the difference between the proportion of the total minority and non-minority populations in the total service area and the proportion of the affected minority and non-minority populations within the affected service area, a ½ mile radius of the route.

Disproportionate Burden Policy: DTS determines the occurrence of a disproportionate burden when adverse effects of a major service change disproportionately affects low income populations by more than 10% based on the difference between the proportion of the total low income and non-low income populations in the total service area and the proportion of the affected low income and non-low income populations within the affected service area, a ½ mile radius of the route.

Analysis Framework

Methodology: Title VI Population data by Census Block Groups retrieved from the Oahu Metropolitan Planning Organization (OMPO) and Route data from Remix were used to determine:

- Minority/non-minority and low income/non-low-income proportion of the total service area population in the Census block groups served by Route U1
- Minority/non-minority and low income/non-low-income proportion of the affected service area population located within a ½ mile radius of the existing Routes or new route(s)

The differences between the minority proportions and low-income proportions were calculated to determine disparate impact on minority populations and disproportionate burden on low-income populations. Differences exceeding 10% indicate that the major service change affected minority populations disparately and low-income populations disproportionately.

Table 1: Census Block Group Minority Populations – Proposed

Route	Total Service Area			Affected Service Area			% Difference	Disparate
	Affected Population	Minority Population	% Minority	Affected Population	Minority Population	% Minority	Total-Affected Service Areas	Impact >10%
U1	149,108	1,316	0.9%	110,700	700	0.8%	0.1%	NO

Table 2: Census Block Group Low Income Populations – Proposed

Route	Total Service Area			Affected Service Area			% Difference	Disparate
	Affected Population	Low Income Population	% Low Income	Affected Population	Low Income Population	% Low Income	Total-Affected Service Areas	Impact >10%
U1	149,108	1,695	1%	110,700	2,100	2%	-1%	NO

Maps: (see Attachment 1)
Affected census block groups with minority and low income area block groups.

Assessing Impacts

Disparate Impact: The minority Census block group populations for the Routes' total service and affected service areas are shown in Table 1.

The proposed service changes to Route U1 do not exceed the disparate impact policy threshold of 10% for the affected service areas as noted below:

- The minority population difference for Route U1 between the total service area and affected service area is 0.1%.

Disproportionate Burden: The low income Census block group populations for the Routes' total service and affected service areas are shown in Table 2.

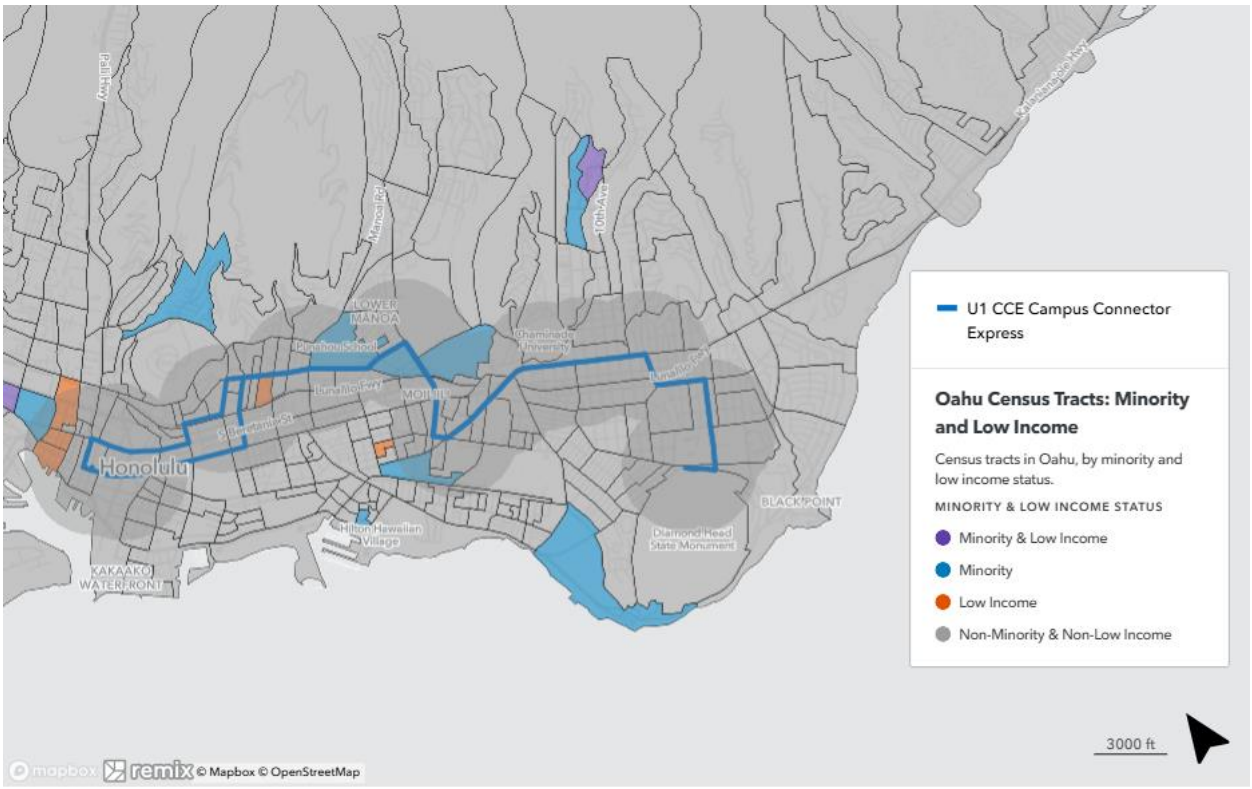
The proposed service changes to Routes U1 do not exceed the disproportionate burden policy threshold of 10% for the affected service area as noted below:

- The low income population difference for Route U1 between the total service area and affected service area is -1%.

Service Equity Analysis

Based on the thresholds established in the DTS Major Service & Fare Change Policy and Disparate Impact & Disproportionate Burden Policies, the proposed new Route U1 do not disproportionately affect minority and low income populations, and can be implemented as proposed.

Attachment 1:



Department of Transportation Services (DTS)
Transportation Mobility Division Title VI Program
Service Equity Analysis Report
Route(s): 416 Kapolei Circulator (2022)
Change(s): Reroute

Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. DTS' 2022 Public Transit Title VI Program identifies the policies and procedures used to determine whether service change proposals are considered "major" and to evaluate the impact of major service changes on minority and low income populations.

This analyzes a proposed reroute of Route 416 to reestablish service on Wakea St.

Background

The Route 416 (Kapolei Circulator) purpose is to service between the Kapolei town center on Kamokila Blvd and Keahumoa Pkwy along the East Kapolei Rail Station. With rail projected to opening in the near future, this circulator connects the key transit corridors that extends eastward toward Honolulu with shopping centers (i.e. Ka Makana Alii) and Kapolei's town center.

The main goal of the proposed reroute is to reestablish service on Wakea St that was previously discontinued in 2021 because of the need to service the Mehana at Kapolei community. Wakea St is a prominent area ideal for public transit, and a new turn restriction will be implemented at Kamaaha Ave and Kapolei Pkwy intersection which necessitates this routing modification. No other routing or service for this route will be discontinued.

Proposed Changes

- Re-establish bus service on Wakea St by westbound route (via right Kapolei Pkwy on Kamaaha Ave and left to Wakea St, continuing route on Kamaaha Ave and Kapolei Pkwy) and eastbound route (via left on Kapolei Pkwy, right to Wakea St, right on Kapolei Pkwy and back left to Kamaaha Ave).
- Re-establish Bus Stop #4585 (Wakea St + Kuou St) and Bus Stop #4582 (Wakea St + Kuou St).

Major Service Change Criteria

Based on the "Temporary service addition or change lasting longer than twelve months" criteria for Route 416 the proposed changes are subjected to a service equity analysis.

Public Outreach Activities

Public outreach and participation are important components when planning service changes. Riders/public are encouraged to provide comments and suggestions via email, phone call, voicemail, and the website portal. Point of contact information is provided on all notifications to provide the public with various options to voice their comments. To elicit feedback on the proposed changes, the following outreach methods are utilized.

- Notification email and copies of Rider Notices to Honolulu City Council Members whose districts are affected by the proposals and the Transportation Committee Chair.
- Notification email and copies of Rider Notices to the Neighborhood Boards affected by the proposals. (Presentation to be made upon request)
- Onboard interaction with riders on the proposed changes.
- Media Notifications by DTS Public Information Specialist. (i.e. Press Release, Twitter, Instagram).
- Rider Notices posted at affected bus stops along affected routes.
- Onboard notification and distribution of Rider Notices by bus operators of affected routes.
- Distribution of Rider Notices to selected developments, businesses, facilities, residents, etc. affected by the proposals.
- Notifications on TheBus.org website and linked to the DTS website.
- Notification email and copies of Rider Notices are provided to the Department of Human Services/Division of Vocational Rehabilitation/Hoopono Services for the Blind for distribution and are in a format on the website to use low sight features.
- Informational material on the website are available in a format to use the translation feature. Translation of notices into a required language(s) will be provided on request, unless the service area's neighborhood board/bus drivers indicate that translated notices are needed for the limited English population.

Title VI Policies and Definitions

DTS' Title VI Program contains the policies and procedures to determine if service changes are considered "major" and to evaluate the impact of major service changes to minority and low income populations.

Major Service Change Policy: Eliminating a route segment is defined as major service change that requires DTS to perform a service equity analysis during the planning phase prior to implementation.

Disparate Impact Policy: DTS determines the occurrence of a disparate impact when adverse effects of a major service change disproportionately affects minority populations by more than 10% based on the difference between the proportion of the total minority and non-minority populations in the total service area and the proportion of the affected minority and non-minority populations within the affected service area, a ½ mile radius of the route.

Disproportionate Burden Policy: DTS determines the occurrence of a disproportionate burden when adverse effects of a major service change disproportionately affects low income populations by more than 10% based on the difference between the proportion of the total low income and non-low income populations in the total service area and the proportion of the affected low income and non-low income populations within the affected service area, a ½ mile radius of the route.

Analysis Framework

Methodology: Title VI Population data by Census Block Groups retrieved from the Oahu Metropolitan Planning Organization (OMPO) and Route data from Remix were used to determine:

- Minority/non-minority and low income/non-low income proportion of the total service area population in the Census block groups served by the existing Route 416
- Minority/non-minority and low income/non-low income proportion of the affected service area population located within a ½ mile radius of the existing Routes or new route(s)

The differences between the minority proportions and low income proportions were calculated to determine disparate impact on minority populations and disproportionate burden on low income populations. Differences exceeding 10% indicate that the major service change affected minority populations disparately and low income populations disproportionately.

Table 1: Census Block Group Minority Populations – Existing

	Total Service Area			Affected Service Area			% Difference	Disparate
Route	Affected Population	Minority Population	% Minority	Affected Population	Minority Population	% Minority	Total-Affected Service Areas	Impact >10%
416	39,551	4,964	13%	23,300	4,000	17%	-4%	NO

Table 2: Census Block Group Low Income Populations – Existing

	Total Service Area			Affected Service Area				
Route	Affected Population	Low Income Population	% Low Income	Affected Population	Low Income Population	% Low Income	% Difference Total-Affected Service Areas	Disparate Impact >10%
416	39,551	1,767	4.5%	23,300	1,000	4%	0.5%	NO

Table 3: Census Block Group Minority Populations – Proposed

	Total Service Area			Affected Service Area			% Difference	Disparate
Route	Affected Population	Minority Population	% Minority	Affected Population	Minority Population	% Minority	Total-Affected Service Areas	Impact >10%
416	39,551	4,964	13%	23,400	4,000	17%	-4%	NO

Table 4: Census Block Group Low Income Populations – Proposed

	Total Service Area			Affected Service Area				
Route	Affected Population	Low Income Population	% Low Income	Affected Population	Low Income Population	% Low Income	% Difference Total-Affected Service Areas	Disparate Impact >10%
416	39,551	1,767	4.5%	23,400	1,000	4%	0.5%	NO

Maps: (see Attachment 1)
Affected census block groups with minority and low income area block groups.

Assessing Impacts

Disparate Impact: The minority Census block group populations for the Routes' total service and affected service areas are shown in Table 1 and Table 3 above.

The proposed service changes to Routes 416 do not exceed the disparate impact policy threshold of 10% for the affected service areas as noted below:

- The minority population difference for Route 416 between the total service area and affected service area are -4% (existing) and -4% (proposed)

Disproportionate Burden: The low income Census block group populations for the Routes' total service and affected service areas are shown in Table 2 and Table 4 above.

The proposed service changes to Routes 416 do not exceed the disproportionate burden policy threshold of 10% for the affected service area as noted below:

- The low income population difference for Route 416 between the total service area and affected service area are 0.5% (existing) and 0.5% (proposed)

Service Equity Analysis

Based on the thresholds established in the DTS Major Service & Fare Change Policy and Disparate Impact & Disproportionate Burden Policies, the proposed service changes to Route 416 do not disproportionately affect minority and low income populations, and can be implemented as proposed.

Attachment 1:


416 Kapolei Circulator
416-Proposed Kapolei Circulator
Oahu Census Tracts: Minority and Low Income
Census tracts in Oahu, by minority and low income status.
MINORITY & LOW INCOME STATUS
Minority & Low Income
Minority
Low Income
Non-Minority & Non-Low Income
University of Hawaii at West Oahu
Ewa Villages
EWA GENTRY
Kapolei
WEST KAPOLEI
Kapolei Pkwy
Kalaeloa Blvd
3000 ft
mapbox
remix
© Mapbox © OpenStreetMap

Department of Transportation Services (DTS)
Transportation Mobility Division Title VI Program
Fare Change Equity Analysis Report
July 2022 Fare Increase
Change(s): Fare Increase

Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. This analysis was conducted in compliance with Federal Transit Administration (FTA) Circular 4702.1B, which requires any FTA recipient providing 50 or more fixed route vehicles in peak service located in an urbanized area and serving a population of 200,000 or greater to evaluate any fare changes at the planning and programming stages to determine whether those changes have a disparate impact on minority populations and disproportionate burden on low income populations.

This report is the fare equity analysis of the proposed fare increases to adult, one-day, youth, senior, and disability passes; and adult cash single fare. Proposed Implementation is scheduled for July 1, 2022.

FTA Circular 4702.1B requires transit providers to analyze ridership data in order to determine whether a potential Disparate Impact or Disproportionate Burden is likely to occur as a result of the provider's proposed fare changes. Circular 4702.1B states that transit provider shall conduct the analysis in the following manner:

1. Determine the number and percent of users of each fare media being changed;
2. Review fares before the change and after the change;
3. Compare the differences for each particular fare media between minority users and overall users; and
4. Compare the differences for each particular fare media between low-income users and overall users.

Background

The Honolulu City Council (Council) sets public transit fare rates by amending the Revised Ordinances of Honolulu (ROH), Chapter 13. Public Transit, Article 2. Island Wide Fare Structure, Section 13-2.(b) Fare Structure Table. In January 2001, Council Resolution No. 00-29 CD-1 was passed and established a policy on funding the operating cost of the City and County of Honolulu (City) bus system. According to Resolution No. 00-29 CD-1, bus fares were adjusted so the fare box recovery ratio did not fall below 27% nor exceed 33%.

In 2019, with Council Resolution 19-10 the recommended fare box recovery policy was changed from 27%-33% to 25%-30%. In fiscal year (FY) 2020 fare box recovery was expected to be 24.04% but the COVID-19 pandemic caused severe service disruptions starting in March 2020. Plummeting ridership continued to follow suit when in FY 2021, the fare box recovery reached 11.45%.

The Honolulu Rate Commission was established in 2017, following a recommendation from the Honolulu Charter Commission. The purpose of the Rate Commission is to review the fares, fees, rates, tolls and other charges for the use of any and all modes of the multimodal municipal transportation system. The Rate Commission recommends adjustments, such that the revenues derived from fares, in conjunction with any other revenues allocated to the multimodal municipal transportation system, is sufficient or as nearly sufficient as possible, to support the operation and maintenance of the multimodal municipal transportation system. In making recommendations on fares, fees, rates, tolls and other charges, the Rate Commission may also consider factors such as transportation equity, accessibility, sustainability, availability, and effect on ridership. (Revised Charter of Honolulu, Section 6-1705)

Bus fares have not changed since the 2018 fare increase. The 2018 fare increases had been proposed in early March 2017 the Mayor's City FY18 operating budget submission to Council to mitigate anticipated fare revenue shortfalls in DTS' FY18 operating budget. It affected adult, one-day, youth, senior, and disability fares and passes. The fare saw a 10% increase for Adult single and day fare, roughly 17% increases for both adult and youth monthly passes, and 20% increase for senior and disability monthly passes. During the public engagement process, these proposed increases met few comments/oppositions on the bus fare increase and instead were mostly focused on the proposed para-transit fare increase. Cutting some bus service to decrease bus operating expense (previously done in 2012 in lieu of fare increases had caused public outcry) was an alternative to the fare increase proposed to the public. DTS in coordination with the City Department of Budget and Fiscal services (BFS) chose to increase bus fares instead of cutting bus service as bus fares had not increased since 2010 and past public opposition to the bus service cuts in 2012.

Throughout 2021, the Rate Commission recommended fare structure and increased rates with Council, amongst the lost of ridership for TheBus and rising fuel/labor/parts costs during the Pandemic. In July 2021, HOLO cards (cashless and reloadable fare card) became the new standard with paper transfers being phased out. This made it easier to track transfers (free and unlimited for 2.5 hours) and it also introduced fare capping for HOLO card users (cash is still accepted but no transfers will be given). HOLO cards were introduced in 2018 and were free. However, a one-time $2 fee for all new/replacement cards is being proposed.

Although increases to para-transit fares are also proposed, a fare equity analysis is not required for fare changes to demand /response service and is not included in this report.

Proposed Changes

- Single Adult ride fare increase from $2.75 to **$3.**
- Daily maximum Adult capped fare (the most someone would pay for a day) increase from $5.50 to **$7.50**.
- Adult monthly pass/capped fare increase from $70 to **$80**.
- Youth (6-17 years old) single ride fare increase from $1.25 to **$1.50**.
- Daily maximum Youth capped fare increase from $2.50 to **$3.75**.
- Youth monthly pass/capped fare increase from $35 to **$40**.
- Senior and Disabled single ride fare increase from $1 to **$1.25** (capped fare from

$2 to **$3**); monthly (from $6 to **$20**); and annual (from $35 to **$45**)
- $2 fee for all new/replacement HOLO cards

Public Engagement Process

October 2021:
During a Rate Commission meeting, Director Morton reviewed DTS ideas for modernizing the fare structure system and policies:

- It should be equitable, fair, convenient to pay, and easy to understand.
- Timing of fare changes should be regular and small rather than irregular and large.
- Strive to make fares on bus, rail and Handi-van the same
- There should be a hiatus on "fare box recovery" until service builds up post-pandemic and until rail comes into town.
- Higher discounts should apply only to residents.
- Fare capping is simple and equitable and provides a good deal to customers
- Annual fares should be phased out. Monthly caps provide best value and simplifies accounting for the city.
- Incentivize use of HOLO card with lower pricing for users. Prepare for use of contactless credit/debit cards in lieu of HOLO cards.
- Move to a cashless system
- Address Title VI responsibilities through a low-income fare program
- Retain current DTS authority to negotiate certain flexible programs such as for universities, institutions, promotional fates, and suspension of fares.
- Further discussion on peer comparisons, continued over from the previous meeting with additional information supplied by DTS. Commissioner Burke felt for TheBus, there is no comparison since Honolulu provides such superb service to the community; ridership vastly exceeds that in other areas.
- Discussion about charging for the HOLO card: existing ordinance allows a charge of up to $5.00 per card as of July 1, 2022. Director Morton does not expect to charge that much. Commissioners were uncomfortable with this charge. Director Morton said they are trying to close the gap between those out and those in use to reduce waste. One possibility is to charge only after one free card is issued.
- The department spends $4.5 million per year on the HOLO program.
- Commissioner Armentrout asked about taxi vouchers for same day service as recommended two years ago. Denver is a good example of this working. The Director Morton responded that they are looking at micro-transit, which is on-demand, app-based program similar to Uber.
- Commissioners gave their reactions to other of Director Morton's proposals: extending low income eligibility to students eligible for free lunch; and other low-income eligibility.
- In a public comment, a commentor said that it would be wonderful to have HOLO card on Handi-van and to get away from cash. He asked if coupons could be loaded onto the HOLO card. He shared the concern about the same day taxi program which has not moved in over two years, but has been recommended by others. He strongly favors the satisfaction survey.

Note: The public is able to provide testimony and participate in Rate Commission meetings. Full minutes of Rate Commission meetings are available for public view here: https://www4.honolulu.gov/docushare/dsweb/View/Collection-2800

December 2021:

This Rate Commission meeting focused on the seven fare policies being proposed by DTS. If approved, they would go into effect July 1, 2022 along with previously approved fare increases (delayed implementation due to COVID).

A. Residency requirements
    - Deeply discounted fares for seniors, disabled, and low-income are restricted to residents.
    - Non-residents fares for seniors, disabled, Medicare would be $1.50 per trip, $3.00 per day, and $40 per month.
B. Low income fare
    - Fare for low income TheHandi-Van riders would be $2.00
    - This would increase if regular fares increase (beyond $4.00) and would be set at half the regular fare price.
C. Low income eligibility
    - Currently set at 30% area median income.
    - Add to that: Proof of SSI eligibility (only for an individual); or, eligibility for the DOE Free School Lunch/School Bus Program (Households).
D. Free transfer between TheHandi-Van and Fixed Route
E. Seven-day fare
    - Implement a seven (7)-day fare of $28.80 using the HOLO card, or $14.40 for those eligible for the deeply discounted fare.
F. Agency Trips
    - Fee of $4.00 per trip for coupons sold only at OTS Bus Pass Office.
G. Proposed Fare Schedule for FY 23 (starting July 1, 2022)
    - The proposed schedule simplifies by creating three categories of fares:
        i. Full Fare and Reduced Fare (Youth and out-of-state Seniors/Medicare/Disabled)
        ii. Deeply Discounted (resident Seniors/Disabled)
        iii. The fare table for three years of increases combines fare increases already authorized by either Ordinance 89 or Ordinance 87 (shown in green) as well as new changes being proposed by DTS.

During public input, a member of the public stated that there still needs to be the ability to pay in cash, in case the system crashes. He reiterated previous urgings for a taxi voucher program. Bryan Mick, DCAB, supports the taxi voucher program (same day rides) be launched. He stated the $1.5 million cap on appropriations for low-income subsidy fares is too low.

January 2022:

At Mission Memorial Auditorium:

Fare testimony will begin until the end of February before potential for decision making on policy recommendations. Some public testimony was received in advance of the Rate Commission.

February 2022:

Fare testimony continued on the multiple fare proposals by DTS. Proposals were circulated to Neighborhood Boards, DTS website, and to the newspaper so there had been a fair amount of publicity announcing the taking of testimony. It is the Chair of the Rate Commission intention to move to decision making after receiving input.

Title VI Policies

DTS' Title VI Program contains the policies and procedures to determine if the proposed fare changes will have a disparate impact to minority populations and disproportionate burden to low income populations.

Fare Change Policy: All fare changes (increase or decrease) requires DTS to perform a fare equity analysis during the planning process prior to approval/adoption by Council and subsequent implementation.

Disparate Impact Policy: DTS determines disparate impact when adverse effects of a fare change disproportionately affects minority populations more than non-minority populations.

NOTE: Because this is a fare change that would affect the entire transit network, a disparate impact would affect total minority and non-minority populations entirely regardless of service area.

Disproportionate Burden Policy: DTS determines disproportionate burden when adverse effects of a fare change disproportionately affects low income populations more than non-low income populations.

NOTE: Because this is a fare change that would affect the entire transit network, a disproportionate burden would affect total minority and non-minority populations entirely regardless of service area.

Procedures: If the equity analysis determines that there is no disparate impact to the affected minority population and/or no disproportionate burden to the affected low-income population, DTS-TMD will continue the planning/implementation process of the proposed change. The process will include coordination with council member(s) from the district(s) affected by change(s) and presentation to the public for comments. Results will included in the TVI Program submitted to FTA every three years.

If the equity analysis determines that there is a disparate impact to the affected minority population and/or a disproportionate burden to the affected low-income population, DTS-TMD will review/revise planned changes to avoid, minimize, or mitigate such impacts and conduct another equity analysis on the revised changes to determine that the revised changes do not disproportionately affect minority and/or low-income populations more than non-minority and/or non-low-income populations. Potential adverse effects to minority and/or low-income populations include but not limited to: service changes that reduce service (i.e. eliminate route(s) or segments of routes,

remove trips on a route, change span of service), change the frequency of service (i.e. headway), or fare increases.

If DTS-TMD chooses not to alter the proposed changes despite the potential disparate impact and/or a disproportionate burden on minority/low-income populations, or if DTS-TMD finds, even after revisions, that minority/low-income riders will continue to bear a disproportionate share of the proposed changes, the change may be implemented only if:

1. there is a substantial legitimate justification for the proposed change, and
2. it can be demonstrated that there are no alternatives that would have a less disparate impact on minority/low-income riders but would still accomplish legitimate program goals. In order to make this choice, DTS-TMD must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on minorities/low-income riders, and then implement the least discriminatory alternative.

Analysis Framework

1. Determine the number and percent of users of each fare media being changed

Methodology: Using the Honolulu Transit Comprehensive Operations Analysis Task 1 On-Board Survey, Cambridge Systematics conducted on-board surveys from August 2021 – January 2022. Using this survey, DTS was able to identify fare media usage by group according to their fare type (Table 1). The survey samples are a representative sample of total overall ridership on all fixed routes and is random. Survey participants that were low-income were identified by the income level they selected on the survey (this data uses 2021 Federal poverty income guidelines for Hawaii to identify low-income levels) whereas minority were what they identified by the subgroup ethnicity they selected. There were approximately 5388 possible survey participants. The data reflects only those who answered the survey questions regarding fare usage. Youth were not surveyed* and is thus omitted from this analysis. Changes to annual were not covered as no annual passes were collected for those surveyed.

The “Usage by Group” in Table 1 represents the number of participants with selected usage. The “Usage by Percentage,” represents the percentage from the total of each fare type column.

*Surveying youth (younger than 18 years old) is difficult because it requires consent from an adult.

Table 1: Fare Media Usage

	Usage by Group			Usage by Percentage		
Fare Type	Low-income	Minority	Overall	Low-income	Minority	Overall
Adult	314	905	314	32.6%	33%	51.6%
Youth	N/A	N/A	N/A	N/A	N/A	N/A
Senior	6	37	12	0.6%	1.3%	2%
Disability	4	15	2	0.4%	0.5%	0.3%
Adult Monthly	558	1738	263	57.9%	63.3%	43.2%
Youth Monthly	N/A	N/A	N/A	N/A	N/A	N/A
Senior Monthly	62	16	13	6.4%	0.6%	2.1%
Disability Monthly	20	35	5	2.1%	1.3%	0.8%
Total	964	2746	609	100%	100%	100%

The highlighted in Table 1 shows the greater impacts a fare change would have for a specific group based off their percentage of fare media usage.

- For adult fare (that includes single fare and one-day fare), it would affect the overall riders more.
- For senior fare (that includes single fare and one-day fare), it would affect overall riders more.
- For disability fare (that includes single fare and one-day fare), it would affect both low-income and minority riders more but all three categories are negligible when considering their low usage and relative similar numbers.
- For adult monthly fare, it would affect both low-income and minority riders more
- For senior monthly fare, it would affect low-income more.
- For disability monthly fare, it would affect both low-income and minority riders more.

2. Review fares before the change and after the change

The proposed fare structure increases were determined by the Rate Commission and discussed with City Council with consideration to rising costs, farebox recovery, fare caps, and integration of the future Honolulu Rail System for operation*.

*The Rate Commission is aiming to keep the same fare rate for future rail operations and TheBus for bus-rail integration to ease transfers.

Table 2: Fare Changes Before and After

	Cost		Change	
Fare Type	Existing (2018)	Proposed (2022)	Absolute	%
Adult	$2.75	$3.00	$0.25	9%
Youth	$1.25	$1.50	$0.25	20%
Senior	$1.00	$1.25	$0.25	25%
Disability	$1.00	$1.25	$0.25	25%
Adult Monthly	$70.00	$80.00	$10.00	14%
Youth Monthly	$35.00	$40.00	$5.00	14%
Senior Monthly	$6.00	$20.00	$14.00	233%
Disability Monthly	$6.00	$20.00	$14.00	233%
HOLO card fee	Free	$2.00	$2.00	N/A
Total				

3. Compare the differences for each particular fare media between minority users and overall users

Table 3: Difference Between Minority and Overall Users

	Absolute Value *(the number of participants with selected usage)*		Percent *(from the total of each fare type column)*		Difference (Minority-Overall)
Fare Type	Minority	Overall	Minority	Overall	%
Adult	905	314	33%	51.6%	-18.6%
Youth	N/A	N/A	N/A	N/A	N/A
Senior	37	12	1.3%	2%	-0.7%
Disability	15	2	0.5%	0.3%	0.2%
Adult Monthly	1738	263	63.3%	43.2%	20.1%
Youth Monthly	N/A	N/A	N/A	N/A	N/A
Senior Monthly	16	13	0.6%	2.1%	-1.5%
Disability Monthly	35	5	1.3%	0.8%	0.5%
Total	2746	609	100%	100%	-

Looking at the “Difference” in Table 3, Disability (0.2%), Adult Monthly (20.1%), and Disability Monthly fares (0.5%) will have more minority populations by percentage impacted by the fare changes.

4. Compare the differences for each particular fare media between low-income users and overall users.

Table 4: Difference Between Low-income and Overall Users

	Absolute Value *(the number of participants with selected usage)*		Percent *(from the total of each fare type column)*		Difference (Low-income-Overall)
Fare Type	Low-income	Overall	Low-income	Overall	%
Adult	314	314	32.6%	51.6%	-19%
Youth	N/A	N/A	N/A	N/A	N/A
Senior	6	12	0.6%	2%	-1.4%
Disability	4	2	0.4%	0.3%	0.1%
Adult Monthly	558	263	57.9%	43.2%	14.7%
Youth Monthly	N/A	N/A	N/A	N/A	N/A
Senior Monthly	62	13	6.4%	2.1%	4.3%
Disability Monthly	20	5	2.1%	0.8%	1.3%
Total	964	609	100%	100%	-

Looking at the “Difference” in Table 4, Disability (0.1%), Adult Monthly (14.7%), Senior Monthly (4.3%), and Disability Monthly (1.3%) fares will have more low-income populations by percentage impacted by the fare changes.

Assessing Impacts

Using the survey sample to represent the total ridership, increasing fares will affect low income and minority riders more than overall riders in regards to their usage of the different fare media. Table 5 shows the fare change in relation to the amount the total number low-income or minority riders will have to pay compared to overall riders. It also shows that fare media sales are made up of mostly low income (24.2%) and minority (65.2%) riders compared to overall riders (10.6%).

Disparate Impact and Disproportionate Burden: Based on the survey and the analysis from the numbers presented, both a disparate impact and disproportionate burden exists, particularly for the change in Adult Monthly fares (the difference of 20.1% for minority riders (Table 3) and 14.7% for low-income riders (Table 4) in comparison with overall riders.

Table 5: Usage and Average Fare Change

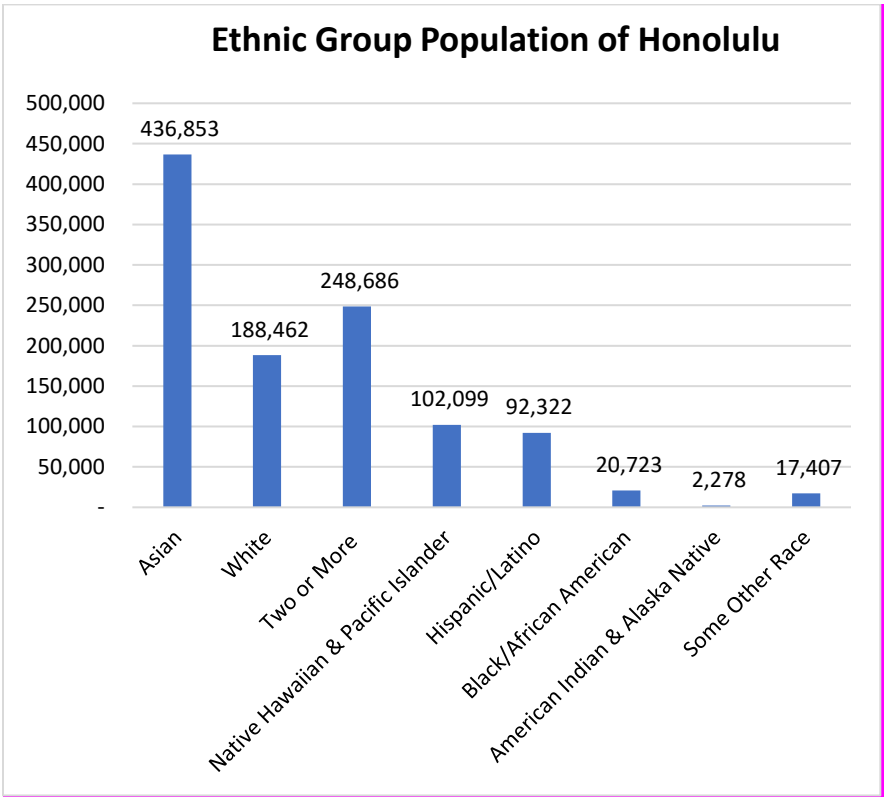
	Usage by Group			Average Fare Change				
Fare Type	Low-income	Minority	Overall	Fare Change %	Fare Change $	Low-income	Minority	Overall
Adult	314	905	314	9%	$0.25	$78.50	$226.25	$78.50
Youth	N/A	N/A	N/A	20%	$0.25	N/A	N/A	N/A
Senior	6	37	12	25%	$0.25	$1.50	$9.25	$3
Disability	4	15	2	25%	$0.25	$1	$3.75	$.50
Adult Monthly	558	1738	263	14%	$10.00	$5580	$17380	$2630
Youth Monthly	N/A	N/A	N/A	14%	$5.00	N/A	N/A	N/A
Senior Monthly	62	16	13	233%	$14.00	$868	$224	$182
Disability Monthly	20	35	5	233%	$14.00	$280	$490	$70
Total						$6809	$18333.25	$2965.50
Average						$1134.83	$3055.54	$494.25
Percentage of fare media sales						24.2%	65.2%	10.6%

Fare Equity Analysis: Because there is a disparate impact and disproportionate burden, mitigation efforts, minimizing fare increases, or not raising fares are possible decisions to considered. Some alternatives are listed below:

- Increase fare on some media (e.g. increase fare on all fare media except for Adult monthly)
- Incremental fare increases
- Not raising fares and consider other options in farebox recovery

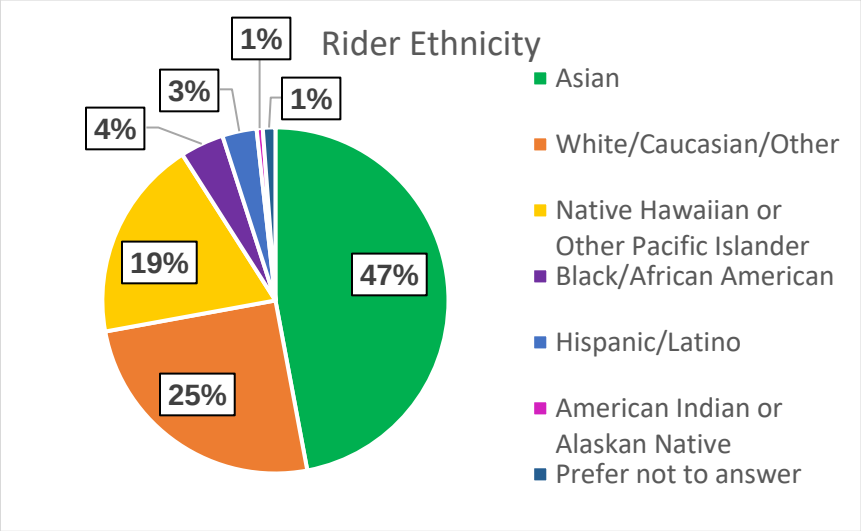
Because fare increases are reviewed by the Rate Commission and ultimately approved by Council, they will have to decide on whether a fare increase is still justifiable. There is existing consideration to low income groups that mitigates low income impacts (the City and County of Honolulu's Bus Pass Subsidy Program established by the Revised Ordinances of Honolulu (ROH) §13-2.10 since November 2004). According to the 2020 U.S. Census (see graph 1), majority of Honolulu’s population fall within a minority group. As such, minority groups will always be disproportionately affected. The on-board survey used for this fare analysis also collected the ethnicities of TheBus riders (see graph 2) and show a direct correlation with the ethnic group populations in Honolulu.

Graph 1:



(Source: United States Census Bureau, 2020 Decennial Census)

Graph 2:



(Source: Honolulu Transit Comprehensive Operations Analysis Task 1 On-Board Survey, Cambridge Systematics, August, 2021)

2023

Department of Transportation Services (DTS)
Transportation Mobility Division Title VI Program
Fare Change Equity Analysis Report
2023 Low Income Fare Program Changes
Change(s): Fare Changes

Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. This analysis was conducted in compliance with Federal Transit Administration (FTA) Circular 4702.1B, which requires any FTA recipient providing 50 or more fixed route vehicles in peak service located in an urbanized area and serving a population of 200,000 or greater to evaluate any fare changes at the planning and programming stages to determine whether those changes have a disparate impact on minority populations and disproportionate burden on low income populations.

This report is the fare equity analysis of the proposed changes to the Bus Pass Subsidy Program (BPSP) established in November 2004, in accordance with the Revised Ordinances of Honolulu (ROH) Section 13-2.10. The BPSP is proposed to be replaced in January 2023, with a new low income reduced fare program, which will be managed by the City's Department of Community Services, and will have a new fare structure.

FTA Circular 4702.1B requires transit providers to analyze ridership data in order to determine whether a potential Disparate Impact or Disproportionate Burden is likely to occur as a result of the provider's proposed fare changes. Circular 4702.1B states that transit provider shall:

1. Determine the number and percent of users of each fare media being changed;
2. Review fares before the change and after the change;
3. Compare the differences for each particular fare media between minority users and overall users; and
4. Compare the differences for each particular fare media between low-income users and overall users.

Background

The Honolulu City Council (Council) sets public transit fare rates by amending the Revised Ordinances of Honolulu (ROH), Chapter 13. Public Transit, Article 2. Island Wide Fare Structure, Section 13-2.(b) Fare Structure Table. In January 2001, Council Resolution No. 00-29 CD-1 was passed and established a policy on funding the operating cost of the City and County of Honolulu (City) bus system. According to Resolution No. 00-29 CD-1, bus fares were adjusted so the fare box recovery ratio did not fall below 27% nor exceed 33%.

In 2019, with Council Resolution 19-10 changed the recommended fare box recovery policy from 27%-33% to 25%-30%. In fiscal year (FY) 2020, fare box recovery was expected to be 24.04% but the COVID-19 pandemic caused severe service disruptions starting in March 2020. In FY 2021, the fare box recovery was 11.45%.

The Honolulu Rate Commission was established in 2017, following a recommendation from the Honolulu Charter Commission. The purpose of the Rate Commission is to review the fares, fees, rates, tolls and other charges for the use of any and all modes of the multimodal municipal transportation system. The Rate Commission recommends adjustments, such that the revenues derived from fares, in conjunction with any other revenues allocated to the multimodal municipal transportation system, is sufficient or as nearly sufficient as possible, to support the operation and maintenance of the multimodal municipal transportation system. In making recommendations on fares, fees, rates, tolls and other charges, the Rate Commission may also consider factors such as transportation equity, accessibility, sustainability, availability, and effect on ridership. (Revised Charter of Honolulu, Section 6-1705)

In 2021, the Rate Commission recommended a new fare structure and increased rates to Council due to the loss of ridership for TheBus and rising fuel/labor/parts costs during the Pandemic. In July 2021, HOLO cards (cashless and reloadable fare card) became the new standard with paper transfers being phased out. This made it easier to track transfers (free and unlimited for 2.5 hours) and also introduced fare capping for HOLO card users (cash is still accepted but no transfers will be given). HOLO cards were introduced in 2018 and were free until July 2022, which is when a one-time $2 fee was implemented for all new/replacement cards.

This new low income reduced fare program* proposes to replace the 2004 Bus Pass Subsidy Program and will have new requirements and a modified fare structure. Although decreases to para-transit fares are also proposed, a fare equity analysis is not required for fare changes to demand /response service and is not included in this report.

*Bill 53 (2022) will amend ROH § 13-2.10 text and procedures to allow individuals who have received eligibility letter from the Social Security Administration for benefits under the Supplemental Security Income program to be eligible for the reduced fare and other individuals who meet household incomes under US Department of Housing and Urban Development guidelines and qualify through an application process through the City's Department of Community Services.

Proposed Changes

- Low income – Reduced fare will now be a standard charge that includes both low income adult and youth.
- Discontinue the current Bus Pass Subsidy program which provides a $10 voucher to use towards an Adult Monthly pass ($70 after voucher) and $6.50 voucher to use towards a Youth Monthly pass ($33.50 after voucher).
- Proposed fares: eligible individuals (Adult/Youth) with Low Income Reduced Fare HOLO cards will be able to pay the below fare structure depending on their circumstances:
    - Single ride fare: $1.25 (HOLO card provides free transfers within 2.5 hours of the initial tap using the same card – No free transfers for cash fare)
    - Daily maximum capped fare: $3.00
    - Monthly maximum capped fare: $20.00
    - Prepaid annual fare for eligibility period: $45.00
- Annual fare capping discontinued

Public Engagement Process

September 2022
Bill first introduced to City Council; public could comment and attend hearing.

October 2022
Public hearing noticed published on Honolulu Star Advertiser newspaper.

November 2022
Public was notified through news media of the proposed changes.

December 2022
Final reading notice was published in Honolulu Star Advertiser newspaper.

Title VI Policies

DTS' Title VI Program contains the policies and procedures to determine if the proposed fare changes will have a disparate impact to minority populations and disproportionate burden to low income populations.

Fare Change Policy: All fare changes (increase or decrease) requires DTS to perform a fare equity analysis during the planning process prior to approval/adoption by Council and subsequent implementation.

Disparate Impact Policy: DTS determines disparate impact when adverse effects of a fare change disproportionately affects minority populations more than non-minority populations.

NOTE: Because this is a fare change that would affect all bus routes, a disparate impact would affect total minority and non-minority populations entirely regardless of service area.

Disproportionate Burden Policy: DTS determines disproportionate burden when adverse effects of a fare change disproportionately affects low income populations more than non-low income populations.

NOTE: Because this is a fare change that would affect all bus routes, a disproportionate burden would affect total minority and non-minority populations entirely regardless of service area.

Procedures: If the equity analysis determines that there is no disparate impact to the affected minority population and/or no disproportionate burden to the affected low-income population, DTS-TMD will continue the planning/implementation process of the proposed change. The process will include coordination with council member(s) from the district(s) affected by change(s) and presentation to the public for comments. Results will included in the TVI Program submitted to FTA every three years.

If the equity analysis determines that there is a disparate impact to the affected minority population and/or a disproportionate burden to the affected low-income population, DTS-TMD will review/revise planned changes to avoid, minimize, or mitigate such impacts and conduct another equity analysis on the revised changes to determine that the revised changes do not disproportionately affect minority and/or low-income populations more than non-minority and/or non-low-income populations. Potential adverse effects to minority and/or low-income populations include but not limited to: service changes that reduce service (i.e. eliminate route(s) or segments of routes, remove trips on a route, change span of service), change the frequency of service (i.e. headway), or fare increases.

If DTS-TMD chooses not to alter the proposed changes despite the potential disparate impact and/or a disproportionate burden on minority/low-income populations, or if DTS-TMD finds, even after revisions, that minority/low-income riders will continue to bear a disproportionate share of the proposed changes, the change may be implemented only if:

3. there is a substantial legitimate justification for the proposed change, and
4. it can be demonstrated that there are no alternatives that would have a less disparate impact on minority/low-income riders but would still accomplish legitimate program goals. In order to make this choice, DTS-TMD must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on minorities/low-income riders, and then implement the least discriminatory alternative.

Analysis Framework

1. Determine the number and percent of users of each fare media being changed

Methodology: Using the Honolulu Transit Comprehensive Operations Analysis Task 1 On-Board Survey, Cambridge Systematics conducted on-board surveys from August 2021 – January 2022. Using this survey, DTS was able to identify fare media usage by group according to fare type (Table 1). The survey samples are a representative sample of total overall ridership on all fixed routes and is random. Survey participants that were low-income were identified by the income level they selected on the survey (this data uses 2021 Federal poverty income guidelines for Hawaii to identify low-income levels) whereas minority were what they identified by the subgroup ethnicity they selected. There were approximately 5388 possible survey participants. The data reflects only those who answered the survey questions regarding fare usage. Youth were not surveyed* and is thus omitted from this analysis. Changes to annual passes were not covered as no annual passes were collected for those surveyed.

The “Usage by Group” in Table 1 represents the number of participants with selected usage. The “Usage by Percentage,” represents the percentage from the total of each fare type column.

*Surveying youth (younger than 18 years old) is difficult because it requires consent from an adult.

Table 1: Fare Media Usage

	Usage by Group	Usage by Percentage

Fare Type	Low-income	Minority	Overall	Low-income	Minority	Overall
Adult	314	905	314	36%	34.2%	54.4%
Youth	N/A	N/A	N/A	N/A	N/A	N/A
Adult Monthly	558	1738	263	64%	65.8%	45.6%
Youth Monthly	N/A	N/A	N/A	N/A	N/A	N/A
Total	872	2643	577	100%	100%	100%

The highlighted in Table 1 shows the greater impacts a fare change would have for a specific group based off their percentage of fare media usage.

- For adult fare (that includes single fare and one-day fare), it would affect the overall riders more.
- For adult monthly fare, it would affect both low-income and minority riders more
- This means that any changes to adult monthly fares would have a significant impact.

2. Review fares before the change and after the change

The proposed fare increases were determined by the Rate Commission and discussed with City Council with consideration to rising costs, farebox recovery, fare caps, and integration of the future Honolulu Rail System*.

*The Rate Commission is aiming to keep the same fare rate for future rail operations and TheBus for bus-rail integration to ease transfers.

Table 2: Fare Changes Before and After

	Cost		Change	
Fare Type	Existing Low Income Rate (July 2022-present)	Proposed Low Income Rate (2023)	Absolute	%
Adult	$3.00	$1.25	-$1.75	-58.3%
Youth	$1.50	$1.25	-$0.25	-16.6%
Adult Monthly	$70.00*	$20.00	-$50.00	-71.4%
Youth Monthly	$33.50*	$20.00	-$13.50	-40.3%
HOLO card fee	$2.00	$2.00	$0.00	N/A
Total				

*The rate after the voucher redemption.

3. Compare the differences for each particular fare media between minority users and overall users

Table 3: Difference Between Minority and Overall Users

	Absolute Value *(the number of participants with selected usage)*		Percent *(from the total of each fare type column)*		Difference (Minority-Overall)
Fare Type	Minority	Overall	Minority	Overall	%
Adult	905	314	34.2%	54.4%	-20.2%
Youth	N/A	N/A	N/A	N/A	N/A
Adult Monthly	1738	263	65.8%	45.6%	20.2%
Youth Monthly	N/A	N/A	N/A	N/A	N/A
Total	2643	577	100%	100%	-

Looking at the “Difference” in Table 3, Adult Monthly fares (20.2%) will have more minority populations by percentage impacted by the fare changes.

4. Compare the differences for each particular fare media between low-income users and overall users.

Table 4: Difference Between Low-income and Overall Users

	Absolute Value *(the number of participants with selected usage)*		Percent *(from the total of each fare type column)*		Difference (Low-income-Overall)
Fare Type	Low-income	Overall	Low-income	Overall	%
Adult	314	314	36%	54.4%	-18.4%
Youth	N/A	N/A	N/A	N/A	N/A
Adult Monthly	558	263	64%	45.6%	18.4%
Youth Monthly	N/A	N/A	N/A	N/A	N/A
Total	872	577	100%	100%	-

Looking at the “Difference” in Table 4, Adult Monthly (18.4%) fares will have more low-income populations by percentage impacted by the fare changes.

Assessing Impacts

Using the survey sample to represent the total ridership, decreasing or increasing fares would affect both low income and minority riders more in regards to their usage of the different fare media. Thus, the greater the usage of a fare type by a group, the more impact a fare change would have in comparison to another group that don't purchase it at much. Table 5 shows the fare change in relation to the amount the total number low income or minority riders will have to pay compared to overall riders. It also shows that fare media sales are made up of mostly low income (21.7%) and minority (67.1%) riders among the three groups.

Disparate Impact and Disproportionate Burden: Based on the survey and the analysis from the numbers presented, both a disparate impact and disproportionate burden exists for the change in Adult Monthly fares (the difference of 20.2% for minority riders (Table 3) and 18.4% for low-income riders (Table 4) in comparison with overall riders.

Table 5: Usage and Average Fare Change

	Usage by Group			Average Fare Change				
Fare Type	Low-income	Minority	Overall	Fare Change %	Fare Change $	Low-income	Minority	Overall
Adult	314	905	314	-58.3%	-$1.75	-$549.50	-$1583.75	-$549.50
Youth	N/A	N/A	N/A	-16.6%	-$0.25	N/A	N/A	N/A
Adult Monthly	558	1738	263	-71.4%	-$50.00	-$27900	-$86900	-$13150
Youth Monthly	N/A	N/A	N/A	-40.3%	-$13.50	N/A	N/A	N/A
Total						-$28449.50	-$88483.75	-$13699.50
Average						-$14224.75	-$44241.88	-$6849.75
Percentage of fare media sales						21.8%	67.7%	10.5%

Fare Equity Analysis: Even though there is a disparate impact and disproportionate burden, this is mitigated by the fact that this new program will decrease fares and is beneficial for low income riders.

Because fare increases and decreases are reviewed by the Rate Commission and ultimately approved by Council, alternatives to these proposed adjustments are determined by them.

Department of Transportation Services (DTS)
Transportation Mobility Division Title VI Program
Service Equity Analysis Report
Route(s): E CountryExpress! Ewa Beach – Waipahu – Waikiki (2023)
Change(s): Reroute

Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. DTS' 2022 Public Transit Title VI Program identifies the policies and procedures used to determine whether service change proposals are considered "major" and to evaluate the impact of major service changes on minority and low income populations.

This report focuses on eastbound routing changes made to the Route E, specifically where the Route E serves the Ala Moana Shopping Center (AMC) area.

Background

The Route E is a rapid bus service that connects the communities of Ewa Beach, Waipahu, Downtown, Ala Moana-Kakaako, and Waikiki. Being a rapid bus service and covering a wide area, it is crucial for its service to be more frequent, reliable, and have limited stops. This means its routing should cover high capacity transit corridors, as well as areas where riders are likely to visit and have the means of accommodating the high volume of bus vehicles. The stops along AMC are one of the major areas where the Route E services. Recent construction on Kona St closed access to traffic and necessitated a detour. In its present routing, going through Kona St also means staying on Kapiolani Blvd and turning into AMC, mauka side of the mall, and eventually leaving Kona Street from Atkinson Dr. to get to Waikiki on Ala Moana Blvd. A Route E detour was required by having the Route E turn from Kapiolani Blvd to Kamakee St and then staying on Ala Moana Blvd, serving the bus stop on the makai side of AMC, which is the same side of AMC that is currently being served by westbound Route E. This detour covers the same area but requires riders traveling eastbound to utilize the makai side of AMC instead of the mauka side of AMC. To keep service consistent, it is recommended that after the construction on Kona St is completed, the eastbound detour segment be made permanent.

Proposed Changes

- The current Ala Moana Blvd eastbound detour will be retained as its permanent routing
- Route E traveling eastbound will no longer serve AMC on Kona St and Mahukona St. Instead it will serve AMC from Ala Moana Blvd. New bus stops will be established on Kamakee St to serve the Kakaako area.
- Discontinue eastbound Route E service at bus stops along Kona St and Mahukona St.
- Establish new eastbound Route E bus stops along Kamakee St and Ala Moana Blvd.

Major Service Change Criteria

Based on the following criteria, the proposal to eliminate the portion of Route E does not meet the criteria for a "major" service change, and therefore, does NOT trigger the requirement for a Service Equity Analysis.

"Eliminating route segments when the affected ridership of the eliminated segment exceeds 10% of the route's total ridership."

Annual ridership FY 2022:

Route E:	998,101
Eliminated segment:	27,457
Affected ridership:	3%

Public Outreach Activities

Public outreach and participation are important components when planning service changes. Riders/public are encouraged to provide comments and suggestions via email, phone call, voicemail, and the website portal. Point of contact information is provided on all notifications to provide the public with various options to voice their comments. To elicit feedback on the proposed changes, the following outreach methods are utilized.

- Notification email and copies of Rider Notices to Honolulu City Council Members whose districts are affected by the proposals and the Transportation Committee Chair.
- Notification email and copies of Rider Notices to the Neighborhood Boards affected by the proposals. (Presentation to be made upon request)
- Onboard interaction with riders on the proposed changes.
- Media Notifications by DTS Public Information Specialist. (i.e. Press Release, Twitter, Instagram).
- Rider Notices posted at affected bus stops along affected routes.
- Onboard notification and distribution of Rider Notices by bus operators of affected routes.
- Distribution of Rider Notices to selected developments, businesses, facilities, residents, etc. affected by the proposals.
- Notifications on TheBus.org website and linked to the DTS website.
- Notification email and copies of Rider Notices are provided to the Department of Human Services/Division of Vocational Rehabilitation/Hoopono Services for the Blind for distribution and are in a format on the website to use low sight features. Informational material on the website are available in a format to use the translation feature. Translation of notices into a required language(s) will be provided on request, unless the service area's neighborhood board/bus drivers indicate that translated notices are needed for the limited English population.

Department of Transportation Services (DTS)
Transportation Mobility Division Title VI Program
Service Equity Analysis Report
Route: 52 Honolulu – Mililani – Haleiwa (2023)

Changes: Reroute

Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. DTS' 2022 Public Transit Title VI Program identifies the policies and procedures used to determine whether service change proposals are considered "major" and to evaluate the impact of major service changes on minority and low income populations.

Background

Route 52 Honolulu – Mililani – Haleiwa links Ala Moana Shopping Center through downtown, Kalihi, and then travels non-stop on the H1 West highway until it transitions into the H-2 North highway toward Mililani. Exiting on Meheula Pkwy to serve the Mililani Mauka community, it travels to the Mililani Park & Ride, serves Mililani High School, and then continues north on Kamehameha Hwy toward the Wahiawa Transit Center. From the Wahiawa Transit Center, it continues further north to serve the Haleiwa community and terminates at Haleiwa Beach Park.

The proposed change should improve transfers between Route 60 Honolulu-Kaneohe-Haleiwa and Route 52 in Haleiwa. Having the Route 52 terminate at Weed Circle provides riders coming from the Route 52 heading Haleiwa bound more opportunity to receive service from Route 60 at Weed Circle. This would require the Route 52 to turn back after reaching Haleiwa Beach Park and service a Route 60 bus stop at Weed Circle before proceeding back southbound on its route back to town.

Proposed Changes

- Route 52 will no longer terminate at Haleiwa Beach Park and will instead terminate at Weed Circle
- New Bus Stop #2206 (Weed Circle + Kaukonahua Rd)

Major Service Change Criteria

"Temporary service addition or change lasting longer than twelve months."

Based on the "Temporary Service Addition" criteria for new bus service (Route 52) the proposed changes are considered a "major" service change requiring a Service Equity Analysis.

Public Outreach Activities

Public outreach and participation are important components when planning service changes. Riders/public are encouraged to provide comments and suggestions via email, phone call, voicemail, and the website portal. Point of contact information is

provided on all notifications to provide the public with various options to voice their comments. To elicit feedback on the proposed changes, the following outreach methods are utilized.

- Notification email and copies of Rider Notices to Honolulu City Council Members whose districts are affected by the proposals and the Transportation Committee Chair.
- Notification email and copies of Rider Notices to the Neighborhood Boards affected by the proposals. (Presentation to be made upon request)
- Onboard interaction with riders on the proposed changes.
- Media Notifications by DTS Public Information Specialist. (i.e. Press Release, Twitter, Instagram).
- Rider Notices posted at affected bus stops along affected routes.
- Onboard notification and distribution of Rider Notices by bus operators of affected routes.
- Distribution of Rider Notices to selected developments, businesses, facilities, residents, etc. affected by the proposals.
- Notifications on TheBus.org website and linked to the DTS website.
- Notification email and copies of Rider Notices are provided to the Department of Human Services/Division of Vocational Rehabilitation/Hoopono Services for the Blind for distribution and are in a format on the website to use low sight features.
- Informational materials on the website are available in a format to use the translation feature. Translation of notices into a required language(s) will be provided on request, unless the service area's neighborhood board/bus drivers indicate that translated notices are needed for the limited English population.

Title VI Policies and Definitions

DTS' Title VI Program contains the policies and procedures to determine if service changes are considered "major" and to evaluate the impact of major service changes to minority and low income populations.

Major Service Change Policy: Eliminating a route segment is defined as major service change that requires DTS to perform a service equity analysis during the planning phase prior to implementation.

Disparate Impact Policy: DTS determines the occurrence of a disparate impact when adverse effects of a major service change disproportionately affects minority populations by more than 10% based on the difference between the proportion of the total minority and non-minority populations in the total service area and the proportion of the affected minority and non-minority populations within the affected service area, a ½ mile radius of the route.

Disproportionate Burden Policy: DTS determines the occurrence of a disproportionate burden when adverse effects of a major service change

disproportionately affects low income populations by more than 10% based on the difference between the proportion of the total low income and non-low income populations in the total service area and the proportion of the affected low income and non-low income populations within the affected service area, a ½ mile radius of the route.

Analysis Framework

Methodology: Title VI Population data by Census Block Groups retrieved from the Oahu Metropolitan Planning Organization (OMPO) and Route data from Remix were used to determine:

- Minority/non-minority and low income/non-low-income proportion of the total service area population in the Census block groups served by the existing Route 52
- Minority/non-minority and low income/non-low-income proportion of the affected service area population located within a ½ mile radius of the existing Routes or new route(s)

The differences between the minority proportions and low-income proportions were calculated to determine disparate impact on minority populations and disproportionate burden on low-income populations. Differences exceeding 10% indicate that the major service change affected minority populations disparately and low-income populations disproportionately.

Table 1: Census Block Group Minority Populations – Existing

	Total Service Area			Affected Service Area			% Difference	Disparate
Route	Affected Population	Minority Population	% Minority	Affected Population	Minority Population	% Minority	Total-Affected Service Areas	Impact >10%
52	162,401	17,971	11%	114,100	14,100	12%	-1%	NO

Table 2: Census Block Group Low Income Populations – Existing

	Total Service Area			Affected Service Area				
Route	Affected Population	Low Income Population	% Low Income	Affected Population	Low Income Population	% Low Income	% Difference Total-Affected Service Areas	Disparate Impact >10%
52	162,401	4,533	3%	114,100	3,700	3%	0%	NO

Table 3: Census Block Group Minority Populations – Proposed

	Total Service Area			Affected Service Area			% Difference	Disparate
Route	Affected Population	Minority Population	% Minority	Affected Population	Minority Population	% Minority	Total-Affected Service Areas	Impact >10%
52	162,401	17,971	11%	114,300	14,100	12%	-1%	NO

Table 4: Census Block Group Low Income Populations – Proposed

	Total Service Area			Affected Service Area				
Route	Affected Population	Low Income Population	% Low Income	Affected Population	Low Income Population	% Low Income	% Difference Total-Affected Service Areas	Disparate Impact >10%
52	162,401	4,533	3%	114,300	3,700	3%	0%	NO

Maps: (see Attachment 1)

Affected census block groups with minority and low income area block groups.

Assessing Impacts

Disparate Impact: The minority Census block group populations for the Routes' total service and affected service areas are shown in Table 1 and Table 3 above.

The proposed service changes to Route 52 do not exceed the disparate impact policy threshold of 10% for the affected service areas as noted below:

- The minority population difference for Route 52 between the total service area and affected service area are -1% (existing) and -1% (proposed)

Disproportionate Burden: The low income Census block group populations for the Routes' total service and affected service areas are shown in Table 2 and Table 4 above.

The proposed service changes to Route 52 do not exceed the disproportionate burden policy threshold of 10% for the affected service area as noted below:

- The low income population difference for Route 52 between the total service area and affected service area are 0% (existing) and 0% (proposed)

Service Equity Analysis

Based on the thresholds established in the DTS Major Service & Fare Change Policy and Disparate Impact & Disproportionate Burden Policies, the proposed service changes to Route 52 do not disproportionately affect minority and low income populations, and can be implemented as proposed.

Attachment 1:



Department of Transportation Services (DTS)
Transportation Mobility Division Title VI Program
Service Equity Analysis Report
Route(s): 2 School-Waikiki-Kapiolani Community College (2023)
2L Kalihi-Waikiki-Kahala Limited (2023)
Change(s): Restructure

Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. DTS' 2022 Public Transit Title VI Program identifies the policies and procedures used to determine whether service change proposals are considered "major" and to evaluate the impact of major service changes on minority (TVI) and low income (EJ) populations.

Background

Trunk Route 2 is the most heavily utilized route in the City's bus system, providing service between Kalihi Transit Center, Central Business District (CBD), Waikiki, and Kapiolani Community College in Kaimuki. Route 2L provides "limited stop" service between Kalihi Transit Center, CBD, Waikiki and Kahala Mall. Ridership for both the Route 2 and Route 2L is high from the Kalihi Transit Center on the west end of the route to Waikiki; however, ridership is marginal east of Waikiki.

Proposed Changes

Route 2 Middle-School-Waikiki
DTS proposes that for two trips per hour will extend further east to Kahala Mall. All remaining trips will turnaround at Monsarrat/Paki Ave, which is approximately 2.5 miles short of its regular route.

Route 2L Kalihi-Waikiki-Kahala Limited
DTS proposes to discontinue the Monsarrat Ave segment and provide direct service to Kahala Mall from Waikiki, discontinuing service to Kapiolani Park.

Major Service Change Criteria

Route 2: Based on the following criteria, the proposed service level change will trigger the requirement for a Service Equity Analysis.

"Temporary service addition or change lasting longer than twelve months"

"Changing service levels (ie: trips, service hours/miles, span of service, headways) for existing routes when ridership of the affected route exceeds 10% of system-wide ridership"

Annual ridership FY 2022
System-wide: 34,753,527
Route 2: 4,021,986 (12%)

Route 2L: Based on the following criteria, the proposed route segment elimination would not trigger the requirement for a Service Equity Analysis.

"Eliminating route segments when the affected ridership of the eliminated segment exceeds 10% of the route's total ridership."

Annual ridership FY 2022:	
Route 2L:	100,179
Eliminated segment:	1,423
Affected ridership:	(1.4 %)

Public Outreach Activities

Public outreach and participation are important components when planning service changes. Riders/public are encouraged to provide comments and suggestions via email, phone call, voicemail, and the website portal. Point of contact information is provided on all notifications to provide the public with various options to voice their comments. To elicit feedback on the proposed changes, the following outreach methods are utilized.

- Notification email and copies of Rider Notices to Honolulu City Council Members whose districts are affected by the proposals and the Transportation Committee Chair.
- Notification email and copies of Rider Notices to the Neighborhood Boards affected by the proposals. (Presentation to be made upon request)
- Onboard interaction with riders on the proposed changes.
- Media Notifications by DTS Public Information Specialist. (i.e. Press Release, Twitter, Instagram).
- Rider Notices posted at affected bus stops along affected routes.
- Onboard notification and distribution of Rider Notices by bus operators of affected routes.
- Distribution of Rider Notices to selected developments, businesses, facilities, residents, etc. affected by the proposals.
- Notifications on TheBus.org website and linked to the DTS website.
- Notification email and copies of Rider Notices are provided to the Department of Human Services/Division of Vocational Rehabilitation/Hoopono Services for the Blind for distribution and are in a format on the website to use low sight features.
- Informational material on the website are available in a format to use the translation feature. Translation of notices into a required language(s) will be provided on request, unless the service area's neighborhood board/bus drivers indicate that translated notices are needed for the limited English population.

Title VI Policies and Definitions

DTS' Title VI Program contains the policies and procedures to determine if service changes are considered "major" and to evaluate the impact of major service changes to minority and low income populations.

Major Service Change Policy: Eliminating a route segment is defined as major service change that requires DTS to perform a service equity analysis during the planning phase prior to implementation.

Disparate Impact Policy: DTS determines the occurrence of a disparate impact when adverse effects of a major service change disproportionately affects minority populations by more than 10% based on the difference between the proportion of the total minority and non-minority populations in the total service area and the proportion of the affected minority and non-minority populations within the affected service area, a ½ mile radius of the route.

Disproportionate Burden Policy: DTS determines the occurrence of a disproportionate burden when adverse effects of a major service change disproportionately affects low income populations by more than 10% based on the difference between the proportion of the total low income and non-low income populations in the total service area and the proportion of the affected low income and non-low income populations within the affected service area, a ½ mile radius of the route.

Analysis Framework

Methodology: Title VI Population data by Census Block Groups retrieved from the Oahu Metropolitan Planning Organization (OMPO) and Route data from Remix were used to determine:

- Minority/non-minority and low income/non-low-income proportion of the total service area population in the Census block groups served by the existing Route 2 and 2L
- Minority/non-minority and low income/non-low-income proportion of the affected service area population located within a ½ mile radius of the existing Routes or new route(s)

The differences between the minority proportions and low-income proportions were calculated to determine disparate impact on minority populations and disproportionate burden on low-income populations. Differences exceeding 10% indicate that the major service change affected minority populations disparately and low-income populations disproportionately.

Table 1: Census Block Group Minority Populations – Existing

	Total Service Area			Affected Service Area			% Difference	Disparate
Route	Affected Population	Minority Population	% Minority	Affected Population	Minority Population	% Minority	Total-Affected Service Areas	Impact >10%
2	197,966	13,397	7%	175,700	14,800	8%	-1%	NO
2L	197,966	13,397	7%	172,500	14,200	8%	-1%	NO

Table 2: Census Block Group Low Income Populations – Existing

Route	Total Service Area			Affected Service Area			% Difference	Disparate
	Affected Population	Low Income Population	% Low Income	Affected Population	Low Income Population	% Low Income	Total-Affected Service Areas	Impact >10%
2	197,966	3,576	2%	175,700	5,900	3%	-1%	NO
2L	197,966	3,576	2%	172,500	5,900	3%	-1%	NO

Table 3: Census Block Group Minority Populations – Proposed

Route	Total Service Area			Affected Service Area			% Difference	Disparate
	Affected Population	Minority Population	% Minority	Affected Population	Minority Population	% Minority	Total-Affected Service Areas	Impact >10%
2	215,676	13,397	6%	184,000	14,800	8%	-2%	NO
2L	222,956	18,273	8%	178,900	14,200	8%	0%	NO

Table 4: Census Block Group Low Income Populations – Proposed

Route	Total Service Area			Affected Service Area			% Difference	Disparate
	Affected Population	Low Income Population	% Low Income	Affected Population	Low Income Population	% Low Income	Total-Affected Service Areas	Impact >10%
2	215,676	3,576	2%	184,000	5,900	3%	-1%	NO
2L	222,956	6,912	3%	178,900	5,900	3%	0%	NO

Required Maps: (see Attachment 1)
Affected census block groups with minority and low income area block groups.

Assessing Impacts

Disparate Impact: The minority Census block group populations for the Routes' total service and affected service areas are shown in Table 1 and Table 3 above.

The proposed service changes to Routes 2 and 2L do not exceed the disparate impact policy threshold of 10% for the affected service areas as noted below:

- The minority population difference for Route 2 between the total service area and affected service area are -1% (existing) and -2% (proposed)
- The minority population difference for Route 2L between the total service area and affected service area are -1% (existing) and 0% (proposed)

Disproportionate Burden: The low income Census block group populations for the Routes' total service and affected service areas are shown in Table 2 and Table 4 above.

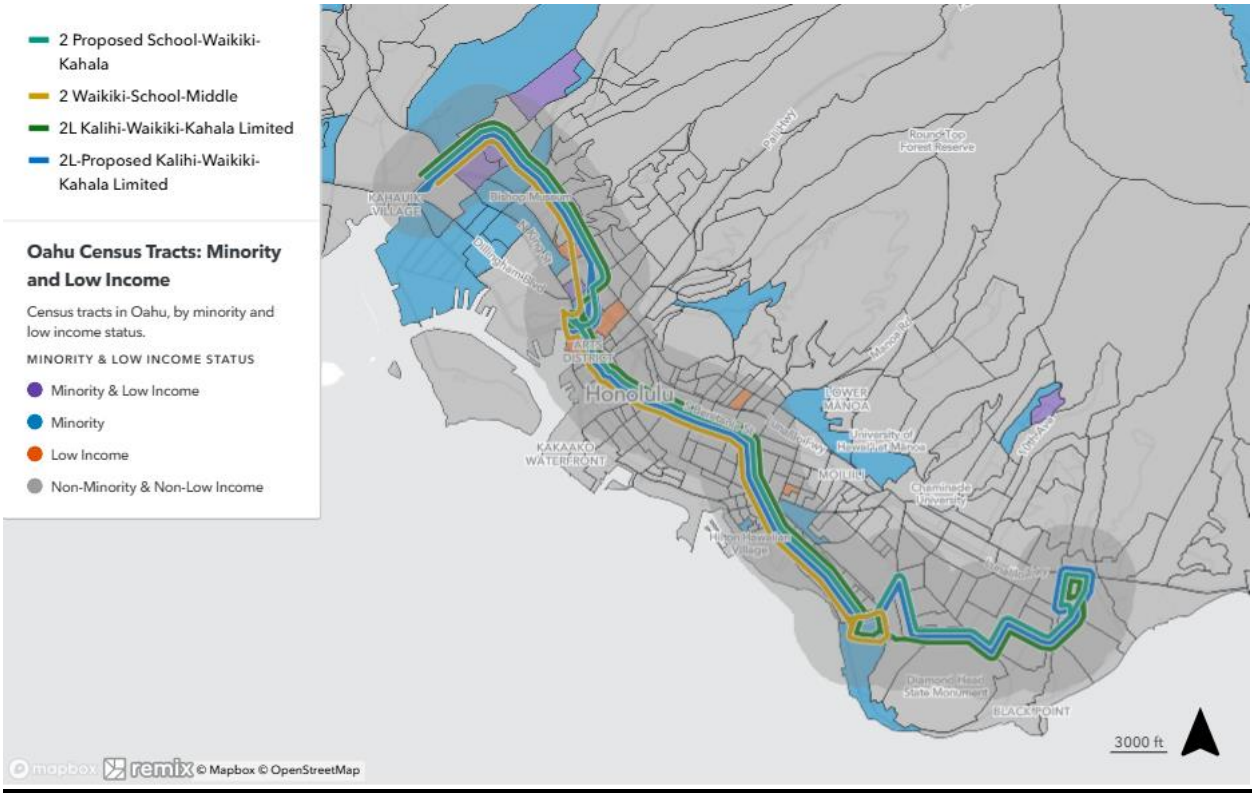
The proposed service changes to Routes 2 and 2L do not exceed the disproportionate burden policy threshold of 10% for the affected service area as noted below:

- The low income population difference for Route 2 between the total service area and affected service area are -1% (existing) and -1% (proposed)
- The low income population difference for Route 2L between the total service area and affected service area are -1% (existing) and 0% (proposed)

Service Equity Analysis

Based on the thresholds established in the DTS Major Service & Fare Change Policy and Disparate Impact & Disproportionate Burden Policies, the proposed service changes to Route 2 and 2L do not disproportionately affect minority and low income populations, and can be implemented as proposed.

Attachment 1:



Department of Transportation Services (DTS)
Transportation Mobility Division Title VI Program
Service Equity Analysis Report
Local Route(s): 121 Nuuanu-Alapai Transit Center (2023)
151 Chinatown-Kuakini-Kauluwela (2023)
Change(s): Discontinuing and Establishing New Route

Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. DTS' 2022 Public Transit Title VI Program identifies the policies and procedures used to determine whether service change proposals are considered "major" and to evaluate the impact of major service changes on minority (TVI) and low income (EJ) populations.

The discontinuation of TheBus Route 121 is being proposed so DTS may redistribute resources and establish New Route 151, which will serve a dense area of Honolulu that includes social services, senior housing, commercial centers, and medical facilities.

Background

Route 121 is a Circulator that transports riders from upper Nuuanu to the Alapai Transit Center via Pali Hwy and Nuuanu Ave. The negligible ridership on the unique segment along Old Pali Rd and route redundancy for the remainder of this route spanning from lower Nuuanu to Alapai Transit Center is the basis for the proposed discontinuation of Route 121.

The new Route 151 will service the areas of Chinatown/Downtown and the surrounding communities in the Liliha area and utilize the major artery roads of Pali Hwy/Bishop St and Liliha St. These areas contain many senior residents and a dense population of minorities, in addition to the commercial areas that are frequently visited.

Major Service Change Criteria

Based on the following criteria, the proposal to discontinue Route 121 does not meet the criteria for a "major" service change, and therefore, does not trigger the requirement for a Service Equity Analysis.

> "Eliminating route(s) when the affected ridership is greater than ten (10) passengers and the percentage of affected ridership exceeds 10% of system-wide ridership. (No major service change will be considered if similar alternate service is available on another existing route.)"

Annual ridership FY 2022	
System-wide:	34,753,527
Route 121:	89,650 (0.2%)

Based on the "Establishing New Routes" criteria, the proposed New Route 151 is considered a major service change and does require a Service Equity Analysis.

"Establishing new routes when the population within a ½ mile radius of the proposed route exceeds 25% of the service area population (Census blocks)."

Census blocks 2020	
Service area population:	55,118
Route 151 population within ½ mile radius:	39,000 (70.7%)

Proposed Changes

- Route 121 (Nuuanu-Alapai Transit Center): Discontinue route. To maximize service delivery and conform to service demands, we propose to transfer the service hours from the Route 121 to the "New" Route 151.
- "New" Route 151 (Chinatown-Kuakini-Kauluwela) will be a new Circulator servicing social services buildings for Harry & Jeanette Weinberg Foundation, Aloha United Way and Salvation Army; several senior housing complexes and high rises, single family/apartment buildings, and rental housing complexes; and medical facilities including Kuakini Medical Center, Rehabilitation Hospital of the Pacific, Lanakila Center for the Blind, and Queen's Medical building.

Public Outreach Activities

Public outreach and participation are important components when planning service changes. Riders/public are encouraged to provide comments and suggestions via email, phone call, voicemail, and the website portal. Point of contact information is provided on all notifications to provide the public with various options to voice their comments. To elicit feedback on the proposed changes, the following outreach methods are utilized.

- Notification email and copies of Rider Notices to Honolulu City Council Members whose districts are affected by the proposals and the Transportation Committee Chair.
- Notification email and copies of Rider Notices to the Neighborhood Boards affected by the proposals. (Presentation to be made upon request)
- Phone notifications and copies of Rider Notices emailed to all affected schools on the proposed discontinued route.
- Rider Notices posted at affected bus stops along affected routes.
- Onboard notification and distribution of Rider Notices by bus operators of affected routes.
- Notifications on TheBus.org website and linked to the DTS website.
- Rider Notices mailed to residents affected by the segment of the Route 121 that will no longer have bus service.
- New Route 151 Rider Notices were delivered to the Kuakini Medical Center, Rehabilitation Hospital of the Pacific, Aloha United Way, Salvation Army, and Halewaiolu Senior Residences.

Title VI Policies and Definitions

Major Service Change Policy: All "major" service changes require a Service Equity Analysis for Title VI purposes during the planning process and prior to implementation.
Disparate Impact Policy: DTS determines the occurrence of a disparate impact when adverse effects of a major service change disproportionately affect minority populations by more than 10% based on the difference between the proportion of the total minority and non-minority populations in the total service area and the proportion of the affected minority and non-minority populations within the affected service area, a ½ mile radius of the route.

Disproportionate Burden Policy: DTS determines the occurrence of a disproportionate burden when adverse effects of a major service change disproportionately affect low-income populations by more than 10% based on the difference between the proportion of the total low income and non-low-income populations in the total service area and the proportion of the affected low income and non-low income populations within the affected service area, a ½ mile radius of the route.

Analysis Framework

Methodology: Title VI Population data by Census Block Groups retrieved from the Oahu Metropolitan Planning Organization (OMPO) and Route data from Remix were used to determine:

- Minority/non-minority and low income/non-low-income proportion of the total service area population in the Census block groups proposed to be served by "New" Route 151.
- Minority/non-minority and low income/non-low-income proportion of the affected service area population located within a ½ mile radius of the proposed "New" Route 151.

The differences between the minority proportions and low-income proportions were calculated to determine disparate impact on minority populations and disproportionate burden on low-income populations. Differences exceeding 10% indicate that the major service change affected minority populations disparately and low-income populations disproportionately.

Data Tables:

Table 1: Census Block Group Minority Populations – Proposed Route 151

	Total Service Area			Affected Service Area			% Difference	Disparate
Route	Affected Population	Minority Population	% Minority	Affected Population	Minority Population	% Minority	Total-Affected Service Areas	Impact/ Burden >10%
151	55,118	5066	9.2%	39,000	2800	7.2%	2%	No

Table 2: Census Block Group Low Income Populations – Proposed Route 151

	Total Service Area			Affected Service Area				
Route	Affected Population	Low Income Population	% Low Income	Affected Population	Low Income Population	% Low Income	% Difference Total-Affected Service Areas	Disparate Impact/ Burden >10%
151	55,118	2421	4.4%	39,000	2300	5.9%	1.5%	No

Maps: (see Attachment 1)
Affected census block groups with minority and low income area block groups.

Assessing Impacts

Disparate Impact: The minority Census block group populations for total service and affected service areas of the proposed "New" Route 151 is shown in Table 1 above. The effects of the service changes do not exceed the disparate impact policy threshold of 10%.

> "New" Route 151: The minority population in the affected service area is 2% less than the minority population in the total service area.

Disproportionate Burden: Table 2 shows the low-income Census block group populations for total service and affected service areas of the proposed "New" Route 151. The effects of the service changes do not exceed the disproportionate burden policy threshold of 10%.

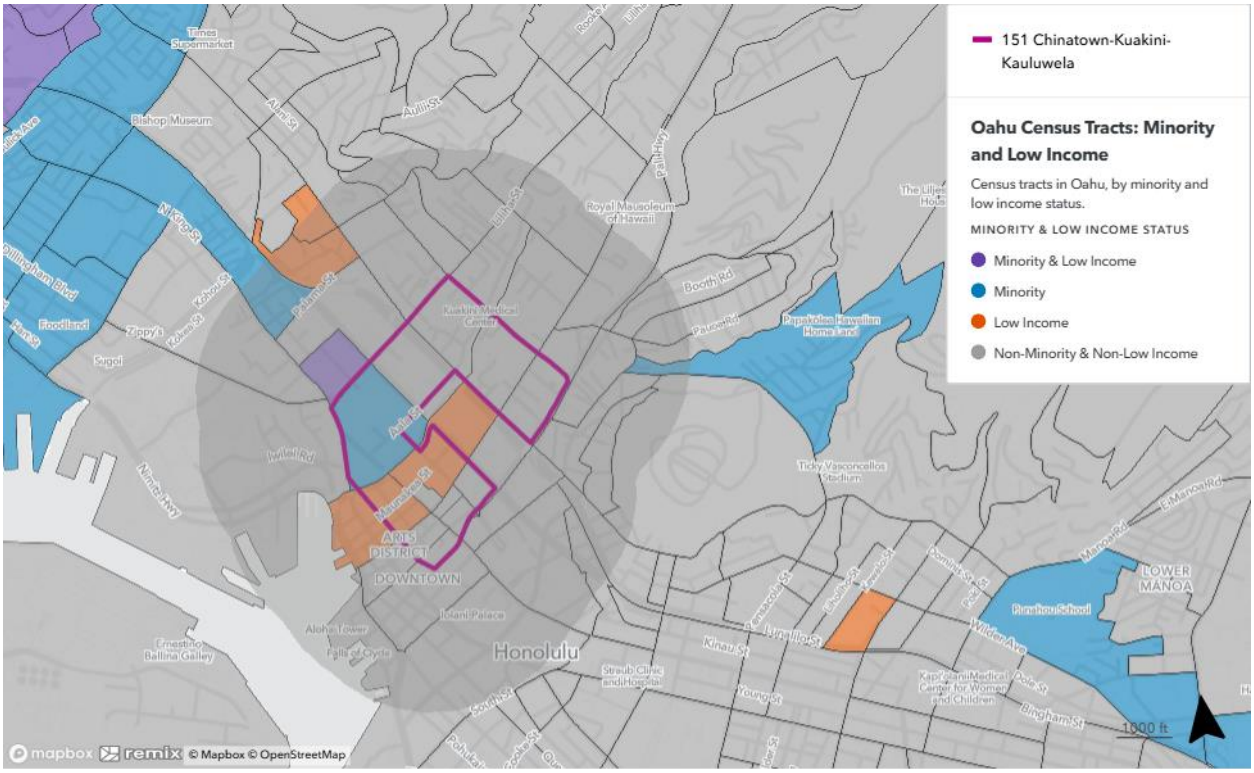
> "New" Route 151: The low-income population in the affected service area is 1.5% more than the low-income population in the total service area.

Service Equity Analysis

Based on the thresholds established in the Major Service & Fare Change Policy and Disparate Impact & Disproportionate Burden Policies, the proposed service changes will NOT disproportionately affect minority and low-income populations, and can be implemented as proposed.

The "New" Route 151 will provide bus service to Minority and Low-Income areas that currently do not have bus service. "New" Route 151 will provide transit-dependent ridership with direct access to medical facilities, senior housing, social services, and commercial centers.

Attachment 1:



Department of Transportation Services (DTS)
Transportation Mobility Division Title VI Program
Service Equity Analysis Report
Local Route(s): 122 Punchbowl-Alapai Transit Center (2023)
Change(s): Segment Elimination

Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. DTS' 2022 Public Transit Title VI Program identifies the policies and procedures used to determine whether service change proposals are considered "major" and to evaluate the impact of major service changes on minority (TVI) and low income (EJ) populations.

TheBus Route 122 service change proposes to eliminate the Vineyard Boulevard and Punchbowl Street segments in order to improve on-time performance and service efficiency.

Background

Route 122 is a short Circulator whose On Time Performance is approximately 50%. Our observations and investigations found that the reason for its habitual lateness is severe traffic congestion in the vicinity of Vineyard Boulevard and Punchbowl Street. The bus stops located within this bottleneck area have the lowest on/offs compared to the stops along the rest of the route.

Proposed Changes

DTS proposes to reroute the Route 122 and eliminate the segments where ridership is lowest and traffic congestion is heaviest in order to improve the route's on-time performance and provide more efficient service for majority of the ridership.

Major Service Change Criteria

Based on the following criteria, the proposal to change the routing of Route 122 does not meet the criteria for a "major" service change, and therefore, does not trigger the requirement for a Service Equity Analysis.

> "Eliminating route segments when the affected ridership of the eliminated segment exceeds 10% of the route's total ridership."

Annual ridership FY 2023

Route 122:	74,181
Route 122 Eliminated Segment:	2,512 (3.4%)

Public Outreach Activities

Public outreach and participation are important components when planning service changes. Riders/public are encouraged to provide comments and suggestions via email, phone call, voicemail, and the website portal. Point of contact information is

provided on all notifications to provide the public with various options to voice their comments. To elicit feedback on the proposed changes, the following outreach methods are utilized.

- Notification email and copies of Rider Notices to Honolulu City Council Members whose districts are affected by the proposals and the Transportation Committee Chair.
- Notification email and copies of Rider Notices to the Neighborhood Boards affected by the proposals. (Presentation to be made upon request)
- Phone notifications and copies of Rider Notices emailed to all affected schools on the proposed discontinued route.
- Rider Notices posted at affected bus stops along affected routes.
- Onboard notification and distribution of Rider Notices by bus operators of affected routes.
- Notifications on TheBus.org website and linked to the DTS website.
- Rider Notices mailed to residents affected by the segment of the route that will no longer have bus service.

Department of Transportation Services (DTS)
Transportation Mobility Division Title VI Program
Service Equity Analysis Report
Local Route(s): 416 Kapolei Circulator (2023)
Change(s): Segment Elimination and Reroute

Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. DTS' 2022 Public Transit Title VI Program identifies the policies and procedures used to determine whether service change proposals are considered "major" and to evaluate the impact of major service changes on minority (TVI) and low income (EJ) populations.

The restructure of Route 416 is being proposed to extend circulatory service further east to a newly developed, non-bus service area.

Background

Route 416 provides east-west service for the full length of Kapolei, bringing ridership to the Kapolei Transit Center from Kapolei Commons in the west and the Kroc Center in the east. However, in recent years the city of Kapolei has expanded further east with Hoopili, a new residential development. Hoopili is located just outside of our bus service area, east of the Kroc Center and adjacent to three new rail stations: Kualakai East Kapolei Skyline Station, Keoneae UH West Oahu Skyline Station, and Honouliuli Hoopili Skyline Station. With Hoopili's new roadway network, housing open for habitation, and Skyline operating and open to the public, DTS proposes to implement bus service in the area.

Proposed Changes

Transfer service of the segment from Kapolei Commons to Kapolei Transit Center to existing Route 46, and extend Route 416 service east of Kroc Center into the Hoopili community. The modified Route 416 will provide circulator service for Hoopili residents to access Skyline stations and the Kapolei Transit Center.

Major Service Change Criteria

"Changing service levels (ie: trips, service hours/miles, span of service, headways) for existing routes when ridership of the affected route exceeds 10% of system-wide ridership."

Annual ridership FY 2023	
System-wide:	38,992,508
Route 416 Eliminated segment:	81,751 (0.2%)

This proposal does not meet the criteria for a "major" service change, and therefore, does not trigger the requirement for a Service Equity Analysis.

Public Outreach Activities

Public outreach and participation are important components when planning service changes. Riders/public are encouraged to provide comments and suggestions via email, phone call, voicemail, and the website portal. Point of contact information is provided on all notifications to provide the public with various options to voice their comments. To elicit feedback on the proposed changes, the following outreach methods are utilized.

- Notification email and copies of Rider Notices to Honolulu City Council Members whose districts are affected by the proposals and the Transportation Committee Chair.
- Notification email and copies of Rider Notices to the Neighborhood Boards affected by the proposals. (Presentation to be made upon request)
- Onboard interaction with riders on the proposed changes.
- Media Notifications by DTS Public Information Specialist. (i.e. Press Release, Twitter, Instagram).
- Rider Notices posted at affected bus stops along affected routes.
- Onboard notification and distribution of Rider Notices by bus operators of affected routes.
- Distribution of Rider Notices to selected developments, businesses, facilities, residents, etc. affected by the proposals.
- Notifications on TheBus.org website and linked to the DTS website.
- Informational material on the website are available in a format to use the translation feature. Translation of notices into a required language(s) will be provided on request, unless the service area's neighborhood board/bus drivers indicate that translated notices are needed for the limited English population.

Department of Transportation Services (DTS)
Transportation Mobility Division Title VI Program
Service Equity Analysis Report
Local Route(s): 434 Waipahu/Village Park (2023)
444 Hoaeae/Village Park-Royal Kunia
Change(s): Renumber and Restructure

Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. DTS' 2022 Public Transit Title VI Program identifies the policies and procedures used to determine whether service change proposals are considered "major" and to evaluate the impact of major service changes on minority (TVI) and low income (EJ) populations.

The restructuring and renumbering of Route 434 (Waipahu/Village Park) is being proposed to minimize route redundancy and improve service connections.

Background

Circulator Route 434 (Waipahu/Village Park) operates between Village Park on the west end and Waipahu Transit Center on the east end, providing service along major bus corridors in between, including Paiwa Street and Farrington Highway. Existing alternate bus service along these corridors connects bus riders to the Waipahu Transit Center, a major transfer point. The recently opened rail system will provide additional service on the segment of Route 434 between Waipahu Transit Center and the Hoaeae West Loch Skyline Station.

The main goals of restructuring Route 434 are:

- Minimize route redundancy and transfer the service hours to provide more frequent service on other routes
- Provide better circulator service by directly connecting ridership to Hoaeae West Loch Skyline Station, another major transfer point, and increasing service frequency to every 30 minutes.

Proposed Changes

- Restructure Route 434. The current route alignment duplicates existing TheBus Routes 40, 42, 99, A, E, and W1 from the Waipahu Transit Center on Hikimoe Street to Hoaeae Rail Station on Farrington Highway; furthermore, this segment is also supplemented by the recently opened rail service. Between the H-1 freeway offramp to the Waipahu Transit Center, Route 434's alignment duplicates Route E.

- Renumber Route 434 to the New Route 444. It will provide circulator service to Village Park and extend into Royal Kunia – an area currently receiving only peak service from Route 97 Village Park Express, providing both communities with direct connection to the Hoaeae Rail Station. This would eliminate the Farrington

Highway, Waipahu Transit Center, Mokuola Street, Puko Street, and Paiwa Street segments.

Major Service Change Criteria

"Eliminating route(s) when the affected ridership is greater than ten (10) passengers and the percentage of affected ridership exceeds 10% of system-wide ridership. (No major service change will be considered if similar alternate service is available on another existing route.)"

Annual Ridership FY 2022	
System-wide:	34,753,527
Route 434:	212,400 (0.6%)

All proposals do not meet the criteria for a "major" service change and do not trigger the requirement for a Service Equity Analysis.

Public Outreach Activities

Public outreach and participation are important components when planning service changes. Riders/public are encouraged to provide comments and suggestions via email, phone call, voicemail, and the website portal. Point of contact information is provided on all notifications to provide the public with various options to voice their comments. To elicit feedback on the proposed changes, the following outreach methods are utilized.

- Notification email and copies of Rider Notices to Honolulu City Council Members whose districts are affected by the proposals and the Transportation Committee Chair.
- Notification email and copies of Rider Notices to the Neighborhood Boards affected by the proposals. (Presentation to be made upon request)
- Onboard interaction with riders on the proposed changes.
- Media Notifications by DTS Public Information Specialist. (i.e. Press Release, Twitter, Instagram).
- Rider Notices posted at affected bus stops along affected routes.
- Onboard notification and distribution of Rider Notices by bus operators of affected routes.
- Distribution of Rider Notices to selected developments, businesses, facilities, residents, etc. affected by the proposals.
- Notifications on TheBus.org website and linked to the DTS website.
- Notification email and copies of Rider Notices are provided to the Department of Human Services/Division of Vocational Rehabilitation/Hoopono Services for the Blind for distribution and are in a format on the website to use low sight features.

Informational materials on the website are available in a format to use the translation feature. Translation of notices into a required language(s) will be provided on request, unless the service area's neighborhood board/bus drivers indicate that translated notices are needed for the limited English population.

Department of Transportation Services (DTS)
Transportation Mobility Division Title VI Program
Service Equity Analysis Report
Local Route(s): 433 Waipahu-Waikele Shopping Center (2023)
Change(s): Reroute

Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. DTS' 2022 Public Transit Title VI Program identifies the policies and procedures used to determine whether service change proposals are considered "major" and to evaluate the impact of major service changes on minority (TVI) and low income (EJ) populations.

TheBus Route 433 Waipahu-Waikele Shopping Center service change proposes to eliminate the Paiwa Road segment and reroute buses through residential areas of Waikele and Waipahu.

Background

Route 433 operates 30 minute service between Waipahu Transit Center and the Waipio community via Waikele and Waipio Shopping Centers.

Proposed Changes

DTS proposes to reroute the 433 Waipahu-Waikele Shopping Center and eliminate the Paiwa St segment, where there are no bus stops, to serve the Waikele community, Waikele Elementary School, and residential streets in Waipahu.

Major Service Change Criteria

Based on the following criteria, the proposal to change the routing of Route 433 does not meet the criteria for a "major" service change, and therefore, does not trigger the requirement for a Service Equity Analysis.

> "Eliminating route segments when the affected ridership of the eliminated segment exceeds 10% of the route's total ridership."

Annual ridership FY 2023	
Route 433:	247,141
Route 433 Eliminated Segment:	0 (0%)

Public Outreach Activities

Public outreach and participation are important components when planning service changes. Riders/public are encouraged to provide comments and suggestions via email, phone call, voicemail, and the website portal. Point of contact information is provided on all notifications to provide the public with various options to voice their comments. To elicit feedback on the proposed changes, the following outreach methods are utilized.

- Notification email and copies of Rider Notices to Honolulu City Council Members whose districts are affected by the proposals and the Transportation Committee Chair.
- Notification email and copies of Rider Notices to the Neighborhood Boards affected by the proposals. (Presentation to be made upon request)
- Phone notifications and copies of Rider Notices emailed to all affected schools on the proposed discontinued route.
- Rider Notices posted at affected bus stops along affected routes.
- Onboard notification and distribution of Rider Notices by bus operators of affected routes.
- Notifications on TheBus.org website and linked to the DTS website.
- Rider Notices mailed to residents affected by the segment of the route that will no longer have bus service.

Department of Transportation Services (DTS)
Transportation Mobility Division Title VI Program
Service Equity Analysis Report
Route(s): Bus Rail Integration Plan (2023)

A	**City Express! (Waipahu-UH Manoa)**
C	**Country Express! (Makaha-Honolulu)**
PH8	**Pearl Harbor-Aloha Stadium Express**
1L	**Hawaii Kai-Kalihi**
20	**Waikiki-Airport-Pearlridge**
44	**Waipahu-Ewa Beach**
46	**Kapolei Commons-UH West Oahu**
53	**Pacific Palisades-Pearl Highlands**
71	**Pearlridge-Newtown**
73	**Leeward Community College**
74	**Aiea-Halawa Heights**
461	**Makakilo-UH West Oahu**
531	**Pearl Highlands-Manana**
532	**Pearl Highlands-Momilani**
533	**Pacific Palisades-Kuala**
535	**Pearl Highlands-PC Penninsula**
541	**Wailuna-Pearlridge**
542	**Newtown-Royal Summit-Pearlridge**
544	**Upper Pearlridge-Pearlridge**
545	**Koauka Lp-Pearlridge**
551	**Aiea Heights-Aloha Stadium**
552	**Halawa Heights-Aloha Stadium**

Change(s): Restructure and Establish New Routes

Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. DTS' 2022 Public Transit Title VI Program identifies the policies and procedures used to determine whether service change proposals are considered "major" and to evaluate the impact of major service changes on minority and low income populations.

In anticipation of the opening of Honolulu's first phase of the rail transit line, "Skyline," The Department of Transportation Services (DTS), The Honolulu Authority of Rapid Transit (HART) and Oahu Transit Services (OTS) designed and coordinated a Bus Rail Integration Plan (BRIP). The BRIP proposes new circulator bus routes and a restructure of existing routes in order to:

- Connect communities on the west side of Oahu to Skyline stations with as much ease and convenience as possible to encourage the use of Skyline as an alternate mode of transportation.
- Reallocate resources to improve service in neighborhoods dependent on public transit, particularly Waipahu, Ewa, Ewa Beach, and Kapolei.
- Provide fast and frequent service between Aloha Stadium Station (the Skyline station located furthest east in this first phase) and high demand destinations such as Downtown Honolulu and UH Manoa.

This report is the service equity analysis of the route restructuring DTS is proposing for TheBus Routes A, C, 1L, 20, 44, 53, 71, 73, 74, as well as the proposed new and/or replacement routes such as Routes: PH8, 46, 461, 531, 532, 533, 535, 541, 542, 544, 545, 551, and 552. These modifications are scheduled for implementation in July 2023, in conjunction with opening of the first phase of Skyline service between East Kapolei Station and Aloha Stadium Station.

Background

Presently without Skyline, communities utilize major trunk routes and rapid routes such as Routes A and C to commute from the western side of Oahu. With the growing communities over the years and Kapolei having developed into a “second city,” bus service is affected by severe congestion on the H-1 freeway. With anticipation of Skyline becoming operational, DTS proposes to restructure a number of bus routes to integrate them more efficiently and reducing redundant service by eliminating segments of major trunk routes. By doing so, bus service will be a major connector to rail stations and support the multi-modal transportation system.

Proposed Changes

- Segment Eliminations for Route A CityExpress!, Route C Country Express!, 44, & 20
- Discontinued routes (with transfer of service): 71, 73, 74
- Replacement routes: 531, 532, 533, 535, 542, 544, 551, & 552
- New Routes: 46, 461, PH8, 541, 545
- Restructured route: 1L (extended)
- Renumbered route: 53 (weekends only)

Because of the complexity and large-scale overhaul of the various routes for this planned BRIP, a table containing all the proposed changes has been constructed to outline the scope of work and the details of each change.

Guidance for BRIP table:

NOTE: Each Route corresponds to a rail station it is primarily serving but not limited to. A “New Route Number” is referring to a route that may be replaced or renumbered. If it is not replaced or renumbered, it will retain its current route number as such.

Common Acronyms Used:

EB = East Bound Bus

WB = West Bound Bus

TC = Transit Center

PC = Pearl City

UH = University of Hawaii

LCC = Leward Community College

Mauka = Mountain direction / side

Makai = Ocean direction / side

JBPHH = Joint Base Pearl Harbor-Hickam

	Current Route Number	New Route Number	Updated Service Areas	Discontinued Service Areas	New Service Areas
East Kapolei / UH West Oahu Stations	C	C	CountryExpress! (Makaha-Kapolei-Honolulu)	Makakilo Dr between H1 Freeway-Farrington Hwy Fort Barrett Rd between Farrington Hwy -Kamaaha Ave. Kapolei TC- but will covered by new stop on Wakea St. Kamokila Blvd between Uluohia St-Kapolei Pkwy will be served by Rt 46. Kapolei Pkwy between Kamokila Blvd-Kalaeloa Blvd will be served by Rt 46.	Kualakai Pkwy Kapolei Pkwy between Kualakai Pkwy-Wakea St Wakea St
	N/A	46	Kapolei Commons-UH West Oahu	None	Kapolei Commons, Kapolei Civic Center District, Villages of Kapolei, Ka Makana Alii, East Kapolei Station, UH West Oahu Station Kapolei Pkwy, Kamokila Blvd, Manawai St, Kamaaha Ave, Kapolei Pkwy, Kualakai Pkwy, Hoomohala Ave.
	N/A	461	Makakilo-UH West Oahu	None	Makakilo (Palahia), Villages of Kapolei, Ka Makana Alii, East Kapolei Station, UH West Oahu Station Kalemakapii St, Limukele St, Iliohe St, Palahia St, Makakilo Dr, Farrington Hwy, Kealanani Ave, Kamaaha Ave, Kapolei Pkwy, Kualakai Pkwy, Hoomohala Ave.
	99	99	Wahiawa-Mililani-Waipahu-Kapolei Express	UH West Oahu bus stop (#667)	UH West Oahu Station via Kualakai Pkwy, Hoomohala Ave

	Current Route Number	New Route Number	Updated Service Areas	Discontinued Service Areas	New Service Areas
West Loch Station	44	44	Waipahu-Ewa Beach	Leoku St. Waipahu St. Leolua St.	West Loch Station

	Current Route Number	New Route Number	Updated Service Areas	Discontinued Service Areas	New Service Areas
Pearl Highlands Station	53 (weekends only) replaced by:	533 (weekends only)	Pacific Palisades-Pearl Highlands	None	Pearl Highlands Station
	73 replaced by:	531	Manana-Pearl Highlands	PC Cultural Center, Komo Mai Dr (EB only) between Waimano Home Rd-Hoomoana St, Waimano Home Rd (mauka bound) between Kuala St/Moanalua Rd-Kuahaka St will be served by Rt 53 on weekdays or 533 on weekends. Waiawa Rd, Ala Ike St, LCC	Hoolaulea St between Waimano Home Rd-Hoomoana St, Hoomoana St between Hoolaulea-Komo Mai, Komo Mai Dr (WB Only) between Hoolaulea St-Waimano Home Rd Hoolaulea St (mauka bound) between Waimano Home Rd-Komo Mai Dr Pearl Highlands Station
		532	Momilani-Pearl Highlands		
		535	Pearl City Penninsula-Pearl Highlands		

	Current Route Number	New Route Number	Updated Service Areas	Discontinued Service Areas	New Service Areas
Pearlridge Station	71 replaced by:	542	Newtown-Royal Summit-Pearlridge	Komo Mai Dr (WB) between Nahele St-Kaahumanu St Kaahumanu St (makai bound) between Komo Mai Dr-Moanalua Rd will be served by Rt 541.	2-way service on Kaahele St between Komo Mai Dr-Moanalua Rd 2-way service on Moanalua Rd between Kaahele St-Kaahumanu St Pearlridge Station
		544	Upper Pearlridge-Pearlridge	None	None
		541	Wailuna (Kaahumanu St)-Pearlridge	None	Kaahumanu St Hookanike St between Hoomalu St-Kaahumanu St Noelani St between Hoomalu St-Kaahumanu St Pearlridge Station
		545	Koauka Lp-Pearlridge	None	Pali Momi St Koauka St Koauka Lp Pearlridge Station

	A	A	CityExpress! (Pearlridge-UH Manoa)	N King St between Liliha St-Kalihi TC Kamehameha Hwy between Kaonohi St-Waimano Home Rd Farrington Hwy between Waiawa Rd-Leoku St Waipahu TC Leoku St Leolua St	Kaonohi St (makai bound) between Moanalua Rd-Kamehameha Hwy Moanalua Rd (WB) between Pali Momi/Koauka St-Kaonohi St Pali Momi St (mauka bound) Aloha Stadium Station Vineyard Blvd at Liliha St N King St + N Beretania St Pearlridge Station
*	Current Route Number	New Route Number	Updated Service Areas	Discontinued Service Areas	New Service Areas

***Pearlridge Station** – continued

	Current Route Number	New Route Number	Updated Service Areas	Discontinued Service Areas	New Service Areas
Aloha Stadium Station	1L	1L	Hawaii Kai-Kalihi-Aloha Stadium	None	Pukoloa St Ala Ilima St between Ala Lilikoi St-Ala Napunani St Salt Lake Blvd between Ala Lilikoi St-Aloha Stadium Aloha Stadium Station
	20	20	Waikiki-Aloha Stadium	Kamehameha Hwy between Salt Lake Blvd-Kaonohi St Kaonohi St (mauka bound) between Kamehameha Hwy-Moanalua Rd Moanalua Rd (EB) between Kaonohi St-Pali Momi St Pali Momi St (makai bound)	Moanalua Rd (WB) between Aiea Heights Dr-Kaamilo St Kaamilo St (mauka bound) between Moanalua Rd-Aiea Heights Dr Aloha Stadium Station
	74 replaced by:	551	Aiea Heights-Aloha Stadium	Aiea Heights Dr (mauka bound) between Moanalua Rd-Kaamilo St	Kaamilo St (mauka bound) between Kahuapaani St-Aliipoe Dr Moanalua Rd (WB)between Aiea Heights Dr-Kaamilo St Aloha Stadium Station
		552	Halawa Heights-Aloha Stadium	Kahuapaani/Halawa Heights (mauka bound) between Ulune St-Aliipoe Dr	Ulune St (mauka bound) between Kahuapaani St-Aliipoe Dr Aliipoe Dr (mauka bound) Aloha Stadium Station
		PH8	Pearl Harbor-Aloha Stadium Express	None	JBPHH

Major Service Change Criteria

- Segment Eliminations for Routes A CityExpress!, C Country Express!, 20, 44
- Discontinued routes (with transfer of service): 73, 71, 74
- New routes: 46, 461, PH8
- Service changes: 1L (extended); 533, 531, 532, 535, 542, 544, 541, 545, 551, 552 absorb service of discontinued routes

Based on the following criteria, the proposal to eliminate segments of Route A CityExpress!, Route C Country Express!, and Route 44 meets the criteria for a "major" service change, and therefore, does trigger the requirement for a Service Equity Analysis.

"Eliminating route segments when the affected ridership of the eliminated segment exceeds 10% of the route's total ridership."

Annual ridership FY 2023:

Route A:	1,881,243
Eliminated segment:	426,749
Affected ridership:	22.7%

Annual ridership FY 2023:

Route C:	986,780
Eliminated segment:	178,437
Affected ridership:	18%

Annual ridership FY 2023:

Route 44:	94,522
Eliminated segment:	26,996
Affected ridership:	28.6%

Moreover, based on the same criteria, the proposal to eliminate a segment of Route 20 does not meet the criteria for "major" service change and does not trigger the requirement for a Service Equity Analysis.

Annual ridership FY 2023:

Route 20:	1,739,010
Eliminated segment:	48,302
Affected ridership:	2.8%

Based on the following criteria, the proposal to discontinue Routes 71, 73, and 74 does not meet the criteria for a "major" service change, and therefore, does NOT trigger the requirement for a Service Equity Analysis.

"Eliminating route(s) when the affected ridership is greater than ten (10) passengers and the percentage of affected ridership exceeds 10% of system-wide ridership. (No major service change will be considered if similar alternate service is available on another existing route.)

Annual ridership FY 2023:

Route 71:	11,994
System-wide:	38,992,508
Affected ridership:	0.03%
Similar alternate services available include:	Routes 542, 544

Annual ridership FY 2023:

Route 73:	52,888
System-wide:	38,992,508
Affected ridership:	0.1%
Similar alternate services available include:	Routes 531, 532, 535

Annual ridership FY 2023:

Route 74:	8,742
System-wide:	38,992,508
Affected ridership:	0.02%
Similar alternate services available include:	Routes 551, 552

Based on the "Establishing New Routes" criteria for new bus service, the proposed changes are considered a "major" service change requiring a Service Equity Analysis.

"Establishing new routes when the population within a ½ mile radius of the proposed route exceeds 25% of the service area population (Census blocks)."

New routes: PH8, 46, 461, 541, and 545

Census blocks 2020

Service Area Population:	36,800
Route 46 population within ½ mile radius:	20,700 = 56%

Census blocks 2020

Service Area Population:	51,200
Route 461 population within ½ mile radius:	36,200 = 71%

Census blocks 2020
Service Area Population: 20,000
Route PH8 population within ½ mile radius: 15,200 = 76%

Census blocks 2020
Service Area Population: 33,900
Route 541 population within ½ mile radius: 24,400 = 72%

Census blocks 2020
Service Area Population: 30,100
Route 545 population within ½ mile radius: 13,700 = 46%

Based on the "changing service levels" criteria, Route 53 (weekends only) does NOT trigger the requirement for a Service Equity Analysis. It also has alternate service available.

"Changing service levels for existing routes when ridership of the affected route exceeds 10% of system-wide ridership."

Annual ridership FY 2023:
Route 53 (weekends only): 287,989
System-wide: 38,992,508
Affected ridership: 0.7 %
Similar alternate services available include: Route 533

Based on the "service additions" criteria, the proposal to add service areas to Route 1L does trigger the requirement for a Service Equity Analysis.

Public Engagement Process

For this proposed restructure intended to begin in July 2023, in conjunction with Skyline opening, all proposed modifications affecting riders of the modified route will be notified in a number of ways. DTS' efforts to engage minority, low income, and Limited English Proficient (LEP) riders will include posting English, Ilocano, and Tagalog Rider Alert notices at affected bus stops, posting car cards on all buses, and conducting on-board distribution of notices, brochures, and maps.

A further breakdown of what will be done / or has been done is simplified below:

- Ewa Town Hall meeting, Waipahu Town Hall meeting, Joint Base Pearl Harbor Hickam Town Hall meeting, Pearl City Town Hall meeting
- Notification to all CMs and NBs of affected routes
- Presentations at Kalihi Valley NB 16, Aliamanu-Salt Lake NB 18, Aiea NB 20, Pearl City NB 21, Waipahu NB 22, Ewa NB 23, Makakilo-Kapolei-Honokai Hale NB 34
- All changes and notices posted on TheBus and DTS websites.

- Press Release
- DTS and OTS social media platforms (e.g. Facebook, Twitter, etc.)

Title VI Policies and Definitions

DTS' Title VI Program contains the policies and procedures to determine if service changes are considered "major" and to evaluate the impact of major service changes to minority and low income populations.

Major Service Change Policy: Eliminating a route segment is defined as major service change that requires DTS to perform a service equity analysis during the planning phase prior to implementation.

Disparate Impact Policy: DTS determines the occurrence of a disparate impact when adverse effects of a major service change disproportionately affects minority populations by more than 10% based on the difference between the proportion of the total minority and non-minority populations in the total service area and the proportion of the affected minority and non-minority populations within the affected service area, a ½ mile radius of the route.

Disproportionate Burden Policy: DTS determines the occurrence of a disproportionate burden when adverse effects of a major service change disproportionately affects low income populations by more than 10% based on the difference between the proportion of the total low income and non-low income populations in the total service area and the proportion of the affected low income and non-low income populations within the affected service area, a ½ mile radius of the route.

Analysis Framework

Methodology: Title VI Population data by Census Block Groups retrieved from the Oahu Metropolitan Planning Organization (OMPO) and Route data from Remix were used to determine:

- Minority/non-minority and low income/non-low-income proportion of the total service area population in the Census block groups served by the existing Route A, C, 1L, 44 and new Routes 46, 461, 541, 545, and PH8.
- Minority/non-minority and low income/non-low-income proportion of the affected service area population located within a ½ mile radius of the existing Routes or new route(s)

The differences between the minority proportions and low-income proportions were calculated to determine disparate impact on minority populations and disproportionate burden on low-income populations. Differences exceeding 10% indicate that the major service change affected minority populations disparately and low-income populations disproportionately.

Table 1: Census Block Group Minority Populations – Existing

Route	Total Service Area			Affected Service Area			% Difference	Disparate
	Affected Population	Minority Population	% Minority	Affected Population	Minority Population	% Minority	Total-Affected Service Areas	Impact >10%
A	249,967	34,541	13.8%	195,300	30,900	15.8%	-2%	NO
C	169,531	34,090	20.1%	114,400	23,600	20.6%	-0.5%	NO
1L	243,644	18,763	7.8%	189,200	16,600	8.8%	-1%	NO
44	98,523	9,287	9.4%	75,000	4,300	5.7%	3.7%	NO

Table 2: Census Block Group Low Income Populations – Existing

Route	Total Service Area			Affected Service Area			% Difference	Disparate
	Affected Population	Low Income Population	% Low Income	Affected Population	Low Income Population	% Low Income	Total-Affected Service Areas	Impact >10%
A	249,967	5,723	22.9%	195,300	5,800	29.7%	-6.8%	NO
C	169,531	8,799	5.2%	114,400	7,000	6.1%	-0.9%	NO
1L	243,644	5,673	2.3%	189,200	4,900	2.6%	-0.3%	NO
44	98,523	2,636	2.7%	75,000	1,600	2.1%	0.6%	NO

Table 3: Census Block Group Minority Populations – Proposed

Route	Total Service Area			Affected Service Area			% Difference	Disparate
	Affected Population	Minority Population	% Minority	Affected Population	Minority Population	% Minority	Total-Affected Service Areas	Impact >10%
A	165,913	6,206	3.7%	128,200	4,800	3.7%	0%	NO
C	180,800	36,200	20%	126,400	26,800	21.2%	-1.2%	NO
1L	292,990	22,003	7.5%	225,200	18,700	8%	-0.5%	NO
44	94,667	9,287	10%	73,100	4,600	6.3%	3.7%	NO
46	36,800	4,964	13.5%	20,700	3,500	17%	-3.5%	NO
461	51,200	5,359	10.5%	36,200	3,400	9.4%	1.1%	NO
541	33,900	600	1.7%	24,400	400	1.6%	0.1%	NO
545	30,100	2,200	7.3	13,700	60	0.4%	6.9%	NO
PH8	20,000	2,635	13%	15,200	3,200	21%	-8%	NO

Table 4: Census Block Group Low Income Populations – Proposed

Route	Total Service Area			Affected Service Area			% Difference	Disparate
	Affected Population	Low Income Population	% Low Income	Affected Population	Low Income Population	% Low Income	Total-Affected Service Areas	Impact >10%
A	165,913	2,254	1.4%	128,200	2,700	2.1%	-0.7%	NO
C	180,800	9,800	5.4%	126,400	7,500	6%	-0.6%	NO
1L	292,990	5,673	2%	225,200	4,900	2%	0%	NO
44	94,667	2,636	2.8%	73,100	1,700	2.3%	0.5%	NO
46	36,800	1,767	5%	20,700	500	2.4%	2.6%	NO
461	51,200	2,359	4.6%	36,200	1,100	3%	1.6%	NO
541	33,900	0	0%	24,400	0	0%	0%	NO
545	30,100	0	0%	13,700	0	0%	0%	NO
PH8	20,000	0	0%	15,200	0	0%	0%	NO

Maps: (see Attachment 1)
Affected census block groups with minority and low income area block groups – all proposed route changes.

Assessing Impacts

Disparate Impact: The minority Census block group populations for the Routes' total service and affected service areas are shown in Table 1 and Table 3 above.

The proposed service changes to Routes A, C, 1L, 44 and new Routes 46, 461, 541, 545, PH8, do not exceed the disparate impact policy threshold of 10% for the affected service areas as noted below:

- The minority population difference for Route A between the total service area and affected service area are -2% (existing) and 0% (proposed).
- The minority population difference for Route C between the total service area and affected service area are -0.5% (existing) and -1.2% (proposed).
- The minority population difference for Route 1L between the total service area and affected service area are -1% (existing) and -0.5% (proposed).
- The minority population difference for Route 44 between the total service area and affected service area are 3.7% (existing) and 3.7% (proposed).
- The minority population difference for Route 46 between the total service area and affected service area is -3.5% (proposed) – new route.
- The minority population difference for Route 461 between the total service area and affected service area is 1.1% (proposed) – new route.
- The minority population difference for Route 541 between the total service area and affected service area is 0.1% (proposed) – new route.
- The minority population difference for Route 545 between the total service area and affected service area is 6.9% (proposed) – new route.
- The minority population difference for Route PH8 between the total service area and affected service area is -8% (proposed) – new route.

Disproportionate Burden: The low income Census block group populations for the Routes' total service and affected service areas are shown in Table 2 and Table 4 above.

The proposed service changes to Routes A, C, 1L, 44 and new Routes 46, 461, 541, 545, PH8, do not exceed the disproportionate burden policy threshold of 10% for the affected service area as noted below:

- The low income population difference for Route A between the total service area and affected service area are -6.8% (existing) and -0.7% (proposed).
- The low income population difference for Route C between the total service area and affected service area are -0.9% (existing) and -0.6% (proposed).
- The low income population difference for Route 1L between the total service area and affected service area are -0.3% (existing) and 0% (proposed).
- The low income population difference for Route 44 between the total service area and affected service area are 0.6% (existing) and 0.5% (proposed).

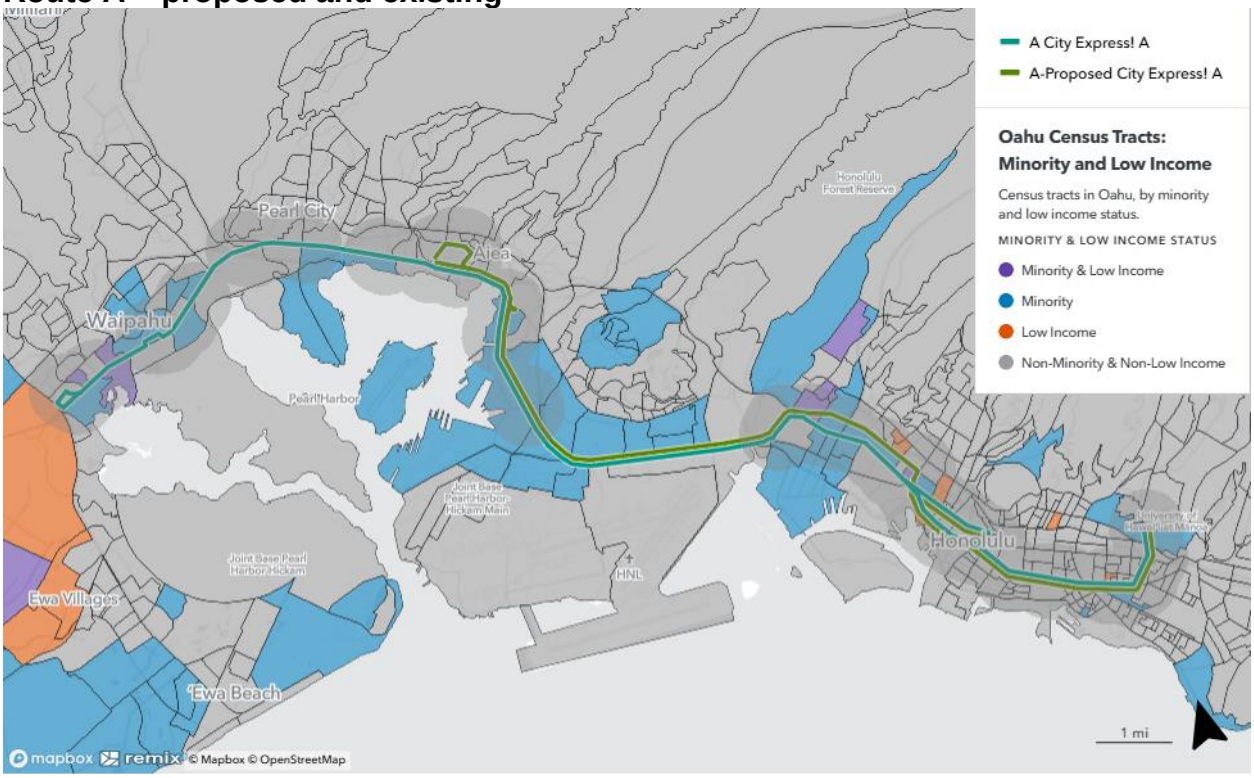
- The low income population difference for Route 46 between the total service area and affected service area is 2.6% (proposed) – new route.
- The low income population difference for Route 461 between the total service area and affected service area is 1.6% (proposed) – new route.
- The low income population difference for Route 541 between the total service area and affected service area is 0% (proposed) – new route.
- The low income population difference for Route 545 between the total service area and affected service area is 0% (proposed) – new route.
- The low income population difference for Route PH8 between the total service area and affected service area is 0% (proposed) – new route.

Service Equity Analysis

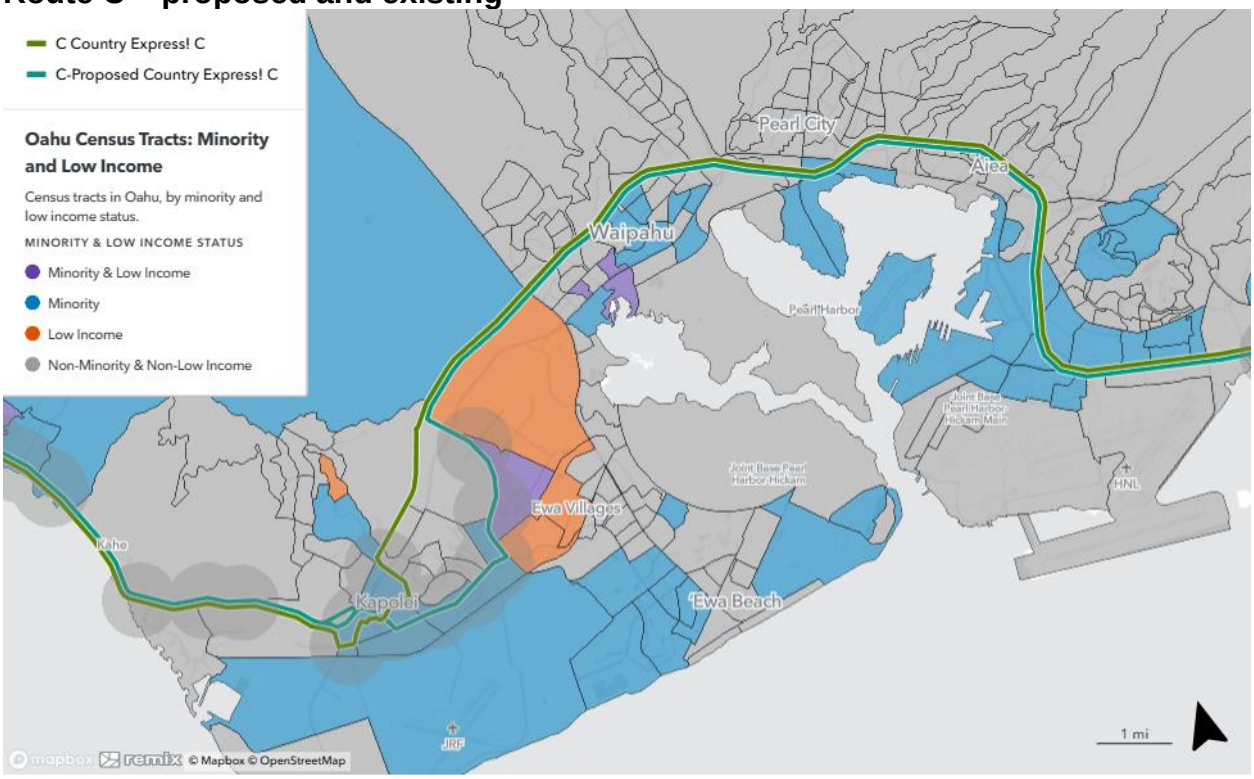
Based on the thresholds established in the DTS Major Service & Fare Change Policy and Disparate Impact & Disproportionate Burden Policies, the proposed service changes to Route A, C, 1L, 44, and all new proposed routes do not disproportionately affect minority and low income populations, and can be implemented as proposed.

Attachment 1:

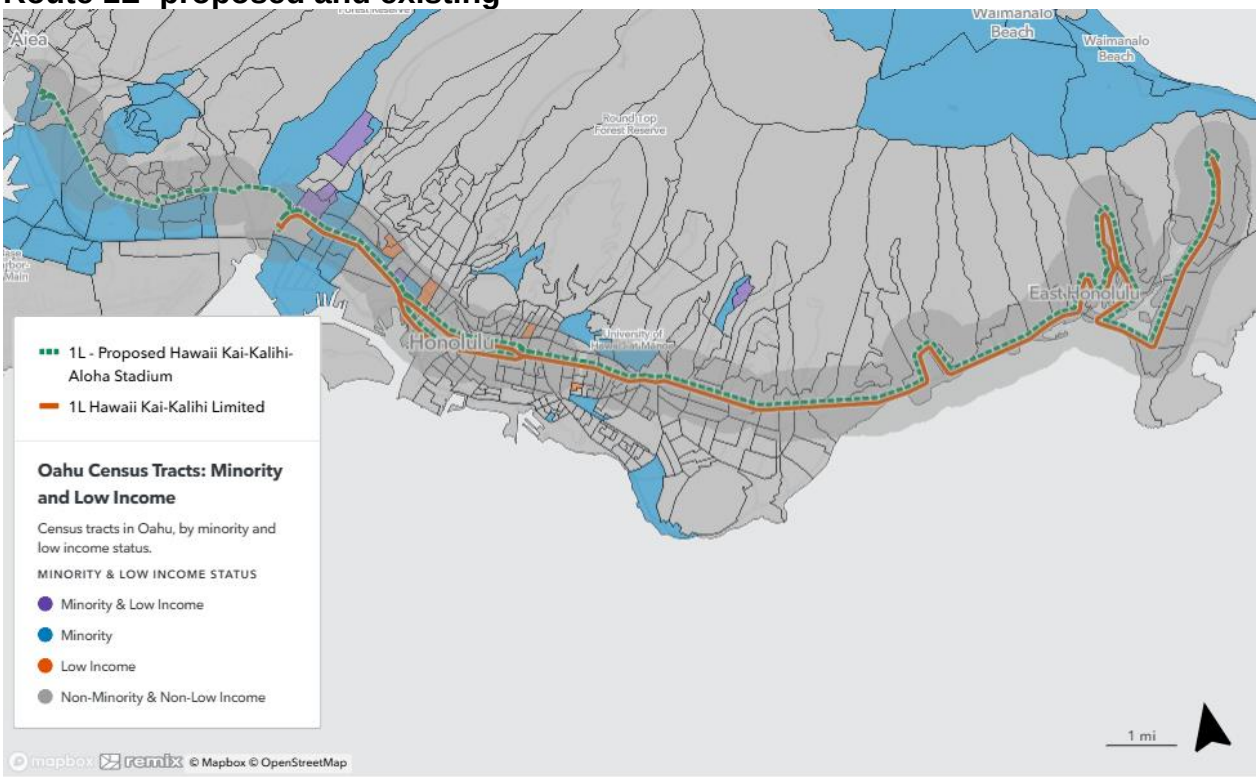
Route A – proposed and existing



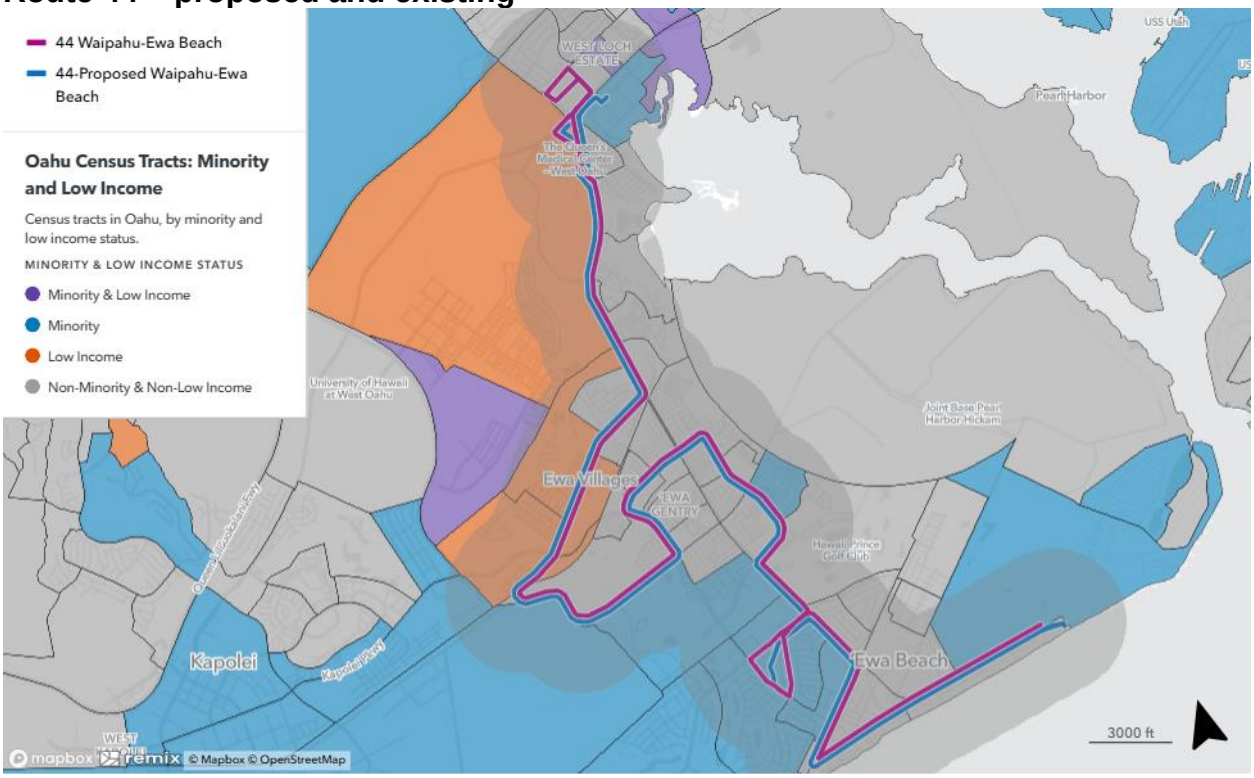
Route C – proposed and existing



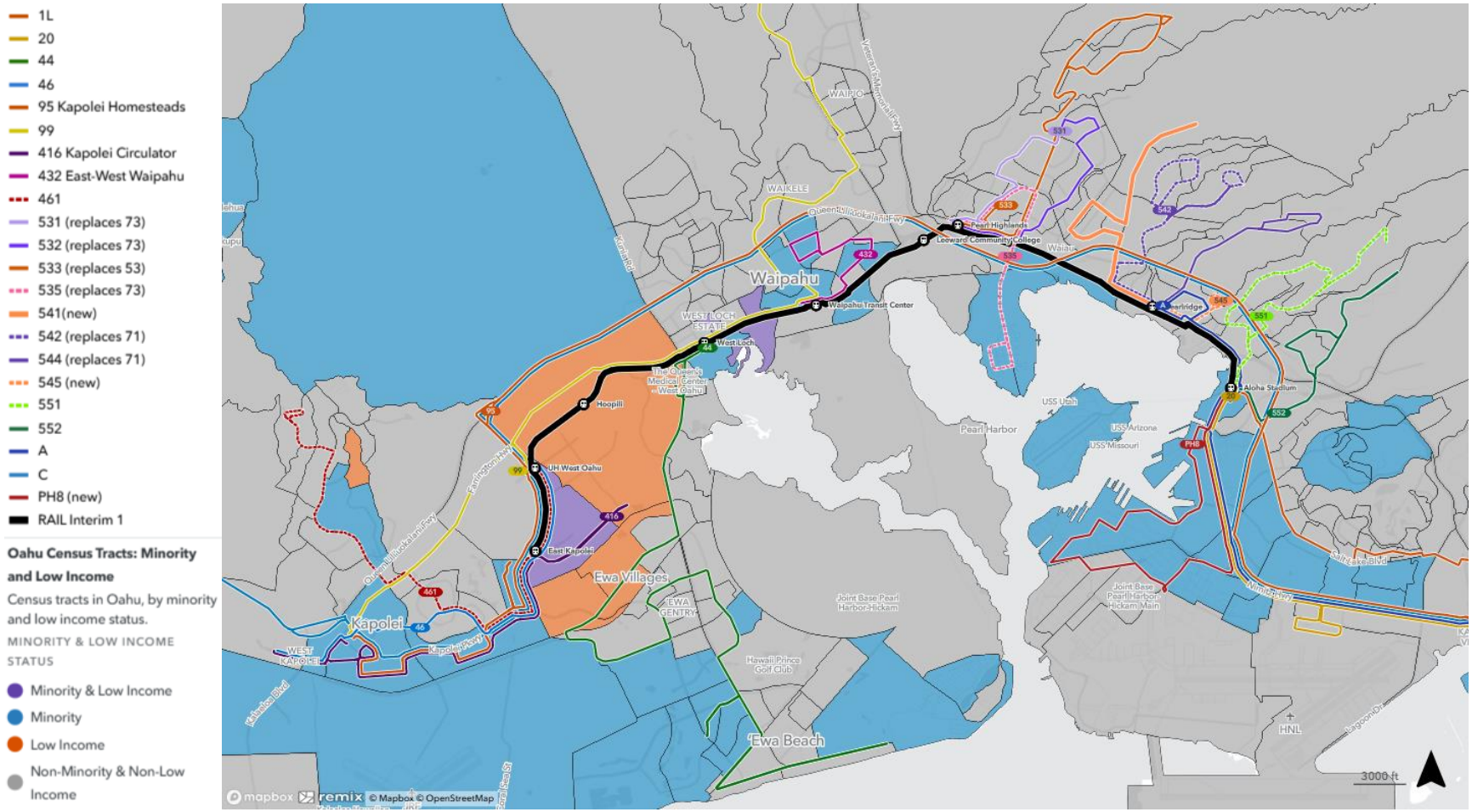
Route 1L- proposed and existing



Route 44 – proposed and existing



All BRIP routes for rail interim opening



2024

Department of Transportation Services (DTS)
Transportation Mobility Division Title VI Program
Service Equity Analysis Report
Local Route(s): 9 Kaimuki-Pearl Harbor (2024)
7 Kalihi Valley (2024)
New Route 307 Kamehameha IV-Kalihi Transit Center (2024)
Change(s): Elimination and Restructure and Establishing New Route

Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. DTS' 2022 Public Transit Title VI Program identifies the policies and procedures used to determine whether service change proposals are considered "major" and to evaluate the impact of major service changes on minority (TVI) and low income (EJ) populations.

Background

Route 9 (Kaimuki-Pearl Harbor) is a trunk route that operates between two anchor points, Pearl Harbor on the west end and Kapiolani Community College on the east end; providing service along major bus corridors in between, including Dillingham Boulevard, Hotel Street, and Kapiolani Boulevard. Existing alternate bus service along these corridors connects bus riders to Chinatown, Downtown Honolulu, Ala Moana Shopping Center, and Kaimuki. The forthcoming second interim opening of the rail system will provide additional service on the segment of Route 9 between Kalihi Transit Center and Pearl Harbor via Dillingham Boulevard, Kamehameha Highway and Nimitz Highway.

Route 7 (Kalihi Valley) is a heavily used Circulator that operates in the Kalihi area and connects riders from Kalihi Valley and Kalihi Valley Homes to local destinations such as Kamehameha Shopping Center and Farrington High School via Kalihi Street and Kamehameha IV Road. Route 7 also brings ridership to major transfer points on North King Street so they may catch Route 1 or Route 1L out of Kalihi either westbound to Kalihi Transit Center or eastbound to Kaimuki.

The main goals of restructuring Route 7 and discontinuing Route 9 are:

- Minimize route redundancy and transfer the service hours to provide more frequent service on other routes
- Provide a direct connection between Kalihi, Chinatown, Downtown, Ala Moana Shopping Center and Kahala Mall
- Provide better circulator service by directly connecting ridership to Kalihi Transit Center and maintaining same service frequency

Proposed Changes

- Route 7: Transfer the Kalena Drive and Kamehameha IV Road segment to the New Route 307; extend service in the eastbound direction from Kalihi Valley to

Kahala Mall providing direct connections to Downtown Honolulu, Victoria Ward Centres, Ala Moana Shopping Center, and Kaimuki. During Peak Service, we propose to have Route 7 service the Kalihi Street segment between North King Street and Dillingham Boulevard in addition to Route 61; however, during Base Service, the Kalihi Street segment will be serviced only by Route 61.

- Route 9: Discontinue route. Route 9's alignment duplicates existing Routes 40, 42, and 51 between Pearl Harbor and the west end of Chinatown. Between the west end of Chinatown and Ala Moana Shopping Center, Route 9's alignment duplicates Routes 3 and 13. Lastly, we propose that Route 9 service from Ala Moana Shopping Center to Kaimuki via Kapiolani Boulevard and Waialae Avenue be transferred to the restructured Route 7.
- New Route 307 will connect ridership from the Kalena Drive and Kamehameha IV Road segment to the Kalihi Transit Center, while providing new service to a portion of Gulick Avenue.

Major Service Change Criteria

Based on the following criteria, both proposals do not meet the criteria for a "major" service change as detailed below and therefore, do not trigger the requirement for a Service Equity Analysis.

> "Eliminating route(s) when the affected ridership is greater than ten (10) passengers and the percentage of affected ridership exceeds 10% of system-wide ridership. (No major service change will be considered if similar alternate service is available on another existing route.)"
>
> Annual ridership FY 2023
> System-wide: 38,992,508
> Route 9: 818,312 (2.1%)
>
> "Changing service levels (ie: trips, service hours/miles, span of service, headways) for existing routes when ridership of the affected route exceeds 10% of system-wide ridership."
>
> Annual Ridership FY 2023
> System-wide: 38,992,508
> Route 7: 474,609 (1.2%)

Public Outreach Activities

Public outreach and participation are important components when planning service changes. Riders/public are encouraged to provide comments and suggestions via email, phone call, voicemail, and the website portal. Point of contact information is provided on all notifications to provide the public with various options to voice their comments. To elicit feedback on the proposed changes, the following outreach methods are utilized.

- Notification email and copies of Rider Notices to Honolulu City Council Members whose districts are affected by the proposals and the Transportation Committee Chair.
- Notification email and copies of Rider Notices to the Neighborhood Boards affected by the proposals.
- Presentations were given to affected Neighborhood Boards.
- Onboard interaction with riders on the proposed changes.
- Media Notifications by DTS Public Information Specialist. (i.e. Press Release, Twitter, Instagram).
- Rider Notices posted at affected bus stops along affected routes.
- Onboard notification and distribution of Rider Notices by bus operators of affected routes.
- Distribution of Rider Notices to selected developments, businesses, facilities, residents, etc. affected by the proposals.
- Notifications on TheBus.org website and linked to the DTS website.
- Notification email and copies of Rider Notices are provided to the Department of Human Services/Division of Vocational Rehabilitation/Hoopono Services for the Blind for distribution and are in a format on the website to use low sight features.
- Informational material on the website are available in a format to use the translation feature. Translation of notices into a required language(s) will be provided on request, unless the service area's neighborhood board/bus drivers indicate that translated notices are needed for the limited English population.

Department of Transportation Services (DTS)
Transportation Mobility Division Title VI Program
Service Equity Analysis Report

Route(s):	**9s Palolo Valley**	**(2024)**
	20 Waikiki – Aloha Stadium	**(2024)**
	200 Kapiolani Park – Palolo Valley	**(2024)**

Change(s): Restructure, Segment Elimination, and New Route

Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. DTS' 2022 Public Transit Title VI Program identifies the policies and procedures used to determine whether service change proposals are considered "major" and to evaluate the impact of major service changes on minority (TVI) and low income (EJ) populations.

Background

Route 9s provides a circulator service between Palolo Valley, a densely populated neighborhood, and Waialae Avenue, a major bus corridor.

Route 20 is a trunk route that provides service between Waikiki and Aloha Stadium. Route 20 is most heavily used between the airport and Waikiki, with the highest concentration of on/offs in the Waikiki Special District. In contrast, Route 20's ridership east of Waikiki in the vicinity of Kapiolani Park is low, and could be more appropriately served by a circulator.

In an effort to improve service for dense communities by connecting them to trunk routes and pedestrian generators, we propose to renumber Route 9s to New Route 200, and expand its service area to Kaimuki, and the Kapahulu-Diamond Head area, which includes the Kapiolani Park loop segment of Route 20.

Proposed Changes

- Renumber Route 9s to New Route 200
- Transfer the Kapiolani Park loop segment of Route 20 to New Route 200
- Extend New Route 200 service to connect ridership from Palolo Valley, Kaimuki, and Kapahulu-Diamond Head to larger trunk routes on major bus corridors such as Kapiolani Boulvard and Waialae Avenue; furthermore, communities would have direct access to major attractors such as Kapiolani Park, the Honolulu Zoo, Kapiolani Community College (KCC), Kaimuki High School, and Market City Shopping Center

Major Service Change Criteria

"Eliminating route(s) when the affected ridership is greater than ten (10) passengers and the percentage of affected ridership exceeds 10% of system-wide ridership. (No

major service change will be considered if similar alternate service is available on another existing route.)"

Annual ridership FY 2023	
System-wide:	38,992,508
Route 9s:	211,609 (0.5%)

"Changing service levels (ie: trips, service hours/miles, span of service, headways) for existing routes when ridership of the affected route exceeds 10% of system-wide ridership."

Annual Ridership FY 2023	
System-wide:	38,992,508
Route 20:	1,739,010 (4.5%)

All proposals do not meet the criteria for a "major" service change as detailed above and therefore, does not trigger the requirement for a Service Equity Analysis.

Public Outreach Activities

Public outreach and participation are important components when planning service changes. Riders/public are encouraged to provide comments and suggestions via email, phone call, voicemail, and the website portal. Point of contact information is provided on all notifications to provide the public with various options to voice their comments. To elicit feedback on the proposed changes, the following outreach methods are utilized.

- Notification email and copies of Rider Notices to Honolulu City Council Members whose districts are affected by the proposals and the Transportation Committee Chair.
- Notification email and copies of Rider Notices to the Neighborhood Boards affected by the proposals.
- Presentations were given to affected Neighborhood Boards.
- Onboard interaction with riders on the proposed changes.
- Media Notifications by DTS Public Information Specialist. (i.e. Press Release, Twitter, Instagram).
- Rider Notices posted at affected bus stops along affected routes.
- Onboard notification and distribution of Rider Notices by bus operators of affected routes.
- Distribution of Rider Notices to selected developments, businesses, facilities, residents, etc. affected by the proposals.
- Notifications on TheBus.org website and linked to the DTS website.
- Notification email and copies of Rider Notices are provided to the Department of Human Services/Division of Vocational Rehabilitation/Hoopono Services for the Blind for distribution and are in a format on the website to use low sight features. Informational material on the website is available in a format to use the translation feature. Translation of notices into required language(s) will be provided on request, unless the service area's neighborhood board/bus

drivers indicate that translated notices are needed for the limited English population.

Department of Transportation Services (DTS)
Transportation Mobility Division Title VI Program
Service Equity Analysis Report

Route(s):	**10 Kalihi-Alewa Heights**	**(2024)**
	41 Kapolei-Ewa Beach	**(2024)**
	123 Papakolea-Pacific Heights	**(2024)**

Change(s): Service Reduction

Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. DTS' 2022 Public Transit Title VI Program identifies the policies and procedures used to determine whether service change proposals are considered "major" and to evaluate the impact of major service changes on minority (TVI) and low income (EJ) populations.

Background

Ridership continues to recover in 2024 and is still approximately 33 percent lower than pre-pandemic level. To address the decrease in ridership levels, TheBus routes/schedules are being evaluated and adjusted to address excessively underutilized service. Proposals include adjustments to span of service, headways, trips and routing.

Proposed Changes

- Route 10 (Kalihi-Alewa Heights): Discontinue the additional afternoon trip variant due to negligable ridership. Reduce the additional afternoon trip variant from three trips to one.
- Route 41 (Kapolei-Ewa Beach): Discontinue the eastbound morning additional trip due to negligible ridership. Add a westbound morning trip.
- Route 123 (Papakolea-Pacific Heights): Discontinue the additional morning trip due to negligible ridership.

Major Service Change Criteria

Based on the following criteria, the proposal to discontinue additional trips on Route 10 Kalihi-Alewa Heights, Route 41 Kapolei-Ewa Beach, and Route 123 Papakolea-Pacific Heights does not meet the criteria for a "major" service change, and therefore, does not trigger the requirement for a Service Equity Analysis.

> "Changing service levels (ie: trips, service hours/miles, span of service, headways) for existing routes when ridership of the affected route exceeds 10% of system-wide ridership"

Annual ridership FY 2023	
System-wide:	38,992,508
Route 10:	107,800 (0.27%)

Annual ridership FY 2023

System-wide:	38,992,508
Route 41:	195,391 (0.50%)

Annual ridership FY 2023

System-wide:	38,992,508
Route 123:	101,806 (0.26%)

Public Outreach Activities

Public outreach and participation are important components when planning service changes. Riders/public are encouraged to provide comments and suggestions via email, phone call, voicemail, and the website portal. Point of contact information is provided on all notifications to provide the public with various options to voice their comments. To elicit feedback on the proposed changes, the following outreach methods are utilized.

- Notification email and copies of Rider Notices to Honolulu City Council Members whose districts are affected by the proposals and the Transportation Committee Chair.
- Notification email and copies of Rider Notices to the Neighborhood Boards affected by the proposals. (Presentation to be made upon request)
- Phone notifications and copies of Rider Notices emailed and mailed to all affected schools on the proposed discontinued route.
- Rider Notices posted at affected bus stops along affected routes.
- Onboard notification and distribution of Rider Notices by bus operators of affected routes.
- Notifications on TheBus.org website and linked to the DTS website.

Department of Transportation Services (DTS)
Transportation Mobility Division Title VI Program
Service Equity Analysis Report
Route(s): 1L Halawa - Hawaii Kai (2024)
Change(s): Reroute

Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. DTS' 2022 Public Transit Title VI Program identifies the policies and procedures used to determine whether service change proposals are considered "major" and to evaluate the impact of major service changes on minority and low income populations.

Background

Route 1L (Halawa – Hawaii Kai) is a trunk route that provides limited stop service between the Halawa Aloha Stadium Skyline Station and Kahala Mall. Local service is provided east of Kahala Mall. The route provides access to key destinations including several high schools, Kalihi and Alapai Transit Centers, major event venues Aloha Stadium and the Neal Blaisdell Center, and Kahala Mall.

Proposed Changes

In Salt Lake, a suburb west of Kalihi Transit Center, buses are routed through residential areas and give ridership access to local shopping centers and grocery stores. We propose to:

- Reroute Route 1L to establish additional service to an area of Salt Lake containing destinations such as the Navy Exchange Mall (NEX) and Moanalua Shopping Center.
- Discontinue Route 1L service on Salt Lake Boulevard between Bougainville Drive and Ala Lilikoi Street.
- Implement local service west of Kalihi Center.

Major Service Change Criteria

Based on the following criteria, both proposals do not meet the criteria for a "major" service change as detailed below and therefore, do not trigger the requirement for a Service Equity Analysis.

> "Changing service levels (ie: trips, service hours/miles, span of service, headways) for existing routes when ridership of the affected route exceeds 10% of system-wide ridership."

Annual Ridership FY 2024	
System-wide:	41,052,559
Route 1L:	1,072,863 (2.6%)

Public Outreach Activities

Public outreach and participation are important components when planning service changes. Riders/public are encouraged to provide comments and suggestions via email, phone call, voicemail, and the website portal. Point of contact information is provided on all notifications to provide the public with various options to voice their comments. To elicit feedback on the proposed changes, the following outreach methods are utilized.

- Notification email and copies of Rider Notices to Honolulu City Council Members whose districts are affected by the proposals and the Transportation Committee Chair.
- Notification email and copies of Rider Notices to the Neighborhood Boards affected by the proposals. (Presentation to be made upon request)
- Onboard interaction with riders on the proposed changes.
- Media Notifications by DTS Public Information Specialist. (i.e. Press Release, Twitter, Instagram).
- Rider Notices posted at affected bus stops along affected routes.
- Onboard notification and distribution of Rider Notices by bus operators of affected routes.
- Distribution of Rider Notices to selected developments, businesses, facilities, residents, etc. affected by the proposals.
- Notifications on TheBus.org website and linked to the DTS website.
- Notification email and copies of Rider Notices are provided to the Department of Human Services/Division of Vocational Rehabilitation/Hoopono Services for the Blind for distribution and are in a format on the website to use low sight features.
- Informational material on the website are available in a format to use the translation feature. Translation of notices into a required language(s) will be provided on request, unless the service area's neighborhood board/bus drivers indicate that translated notices are needed for the limited English population.

Department of Transportation Services (DTS)
Transportation Mobility Division Title VI Program
Service Equity Analysis Report
Route(s): 11 Makalapa-Halawa-Aiea Heights (2024)

Change(s): Elimination

Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. DTS' 2022 Public Transit Title VI Program identifies the policies and procedures used to determine whether service change proposals are considered "major" and to evaluate the impact of major service changes on minority (TVI) and low income (EJ) populations.

Background

Route 11 connects residential areas in Aiea and Halawa to key destinations such as local schools, shopping centers and the Alapai Transit Center in Downtown Honolulu. Route 11 is an underperforming route with the highest average daily offs is 13, fronting a high school, and 13 ons fronting the Pearlridge Shopping Mall.

We propose to discontinue Route 11, and transfer its service areas to circulator routes 551 Aiea Heights-Aloha Stadium, and 552 Halawa Heights-Aloha Stadium. Riders may use the circulators to reach Halawa Aloha Stadium Skyline Station, then transfer to Route A, which provides frequent service, to continue eastbound to Downtown Honolulu. We also propose to increase the frequency of Routes 551 and 552 to offset the discontinuation of Route 11.

Proposed Changes

- Discontinue Route 11 Makalapa-Halawa-Aiea Heights.
- Transfer Route 11 service in Aiea Heights and Pearlridge to Route 551.
- Transfer Route 11 service in Halawa Heights and Makalapa to Route 552.
- Increased frequency of Routes 551 and 552.

Major Service Change Criteria

"Eliminating route(s) when the affected ridership is greater than ten (10) passengers and the percentage of affected ridership exceeds 10% of system-wide ridership. (No major service change will be considered if similar alternate service is available on another existing route.)"

Annual ridership FY 2024	
System-wide:	41,052,559
Route 11:	147,595 (0.3%)

All proposals do not meet the criteria for a “major” service change as detailed below and therefore, do not trigger the requirement for a Service Equity Analysis.

Public Outreach Activities

Public outreach and participation are important components when planning service changes. Riders/public are encouraged to provide comments and suggestions via email, phone call, voicemail, and the website portal. Point of contact information is provided on all notifications to provide the public with various options to voice their comments. To elicit feedback on the proposed changes, the following outreach methods are utilized.

- Notification email and copies of Rider Notices to Honolulu City Council Members whose districts are affected by the proposals and the Transportation Committee Chair.
- Notification email and copies of Rider Notices to the Neighborhood Boards affected by the proposals. (Presentation to be made upon request)
- Onboard interaction with riders on the proposed changes.
- Media Notifications by DTS Public Information Specialist. (i.e. Press Release, Twitter, Instagram).
- Rider Notices posted at affected bus stops along affected routes.
- Onboard notification and distribution of Rider Notices by bus operators of affected routes.
- Distribution of Rider Notices to selected developments, businesses, facilities, residents, etc. affected by the proposals.
- Notifications on TheBus.org website and linked to the DTS website.
- Notification email and copies of Rider Notices are provided to the Department of Human Services/Division of Vocational Rehabilitation/Hoopono Services for the Blind for distribution and are in a format on the website to use low sight features.
- Informational material on the website are available in a format to use the translation feature. Translation of notices into a required language(s) will be provided on request, unless the service area’s neighborhood board/bus drivers indicate that translated notices are needed for the limited English population.

Department of Transportation Services (DTS)
Transportation Mobility Division Title VI Program
Service Equity Analysis Report
Route(s): 43 Waipahu-Honolulu-Alapai Transit Center (2024)
432 East-West Waipahu (2024)
Change(s): Restructure and Elimination

Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. DTS' 2019 Public Transit Title VI Program identifies the policies and procedures used to determine whether service change proposals are considered "major" and to evaluate the impact of major service changes on minority and low income populations.

Background

Route 43 (Waipahu-Honolulu-Alapai Transit Center) is a trunk route that operates 30 minute service between West Loch Skyline Station in Waipahu and the Alapai Transit Center in Downtown Honolulu. Overall, the route maintains a steady average of 32 boardings per trip, with the heaviest trip times corresponding with Waipahu High School students commuting to and from school.

Route 432 (East-West Waipahu) is a circulator route that services the Waipahu community, including several elementary schools, shopping centers, transit centers and Waipahu High School.

The routing for Routes 43 and 432 are the same within Waipahu and are redundant.

Proposed Changes

In an effort to provide ridership with more frequent and on-time service, better connections to Skyline, and reduce route redundancy, we propose to:

- Discontinue Route 432
- Restructure the Route 43 to eliminate service to Honolulu
- Increase Route 43 span of service from 7am – 7pm to 4:30am – 2am
- Reduce Route 43 headways from 30 minutes to 20 minutes

Major Service Change Criteria

Based on the following criteria, the elimination of Route 432 does not trigger the requirement for Service Equity Analysis.

> "Eliminating route(s) when the affected ridership is greater than ten (10) passengers and the percentage of affected ridership exceeds 10% of system-wide ridership. (No major service change will be considered if similar alternate service is available on another existing route.)"

Annual ridership FY 2023	
System-wide:	38,992,508
Route 432:	299,001
Affected Ridership:	0.78%

Based on the following criteria, the increased span of service and reduced headway times does not trigger the requirement for a Service Equity Analysis.

> "Changing service levels for existing routes when ridership of the affected route exceeds 10% of system-wide ridership."

Annual ridership FY 2023	
System-wide:	38,992,508
Route 43:	333,740 (0.86%)

Based on the following criteria, the proposal to eliminate the Honolulu segment of Route 43 is considered a major service change and does require a Service Equity Analysis.

> "Eliminating route segments when the affected ridership of the eliminated segment exceeds 10% of the route's total ridership."

Annual ridership FY 2023:	
Route 43:	333,740
Eliminated segment:	186,125
Affected ridership:	55.8%

Public Outreach Activities

Public outreach and participation are important components when planning service changes. Riders/public are encouraged to provide comments and suggestions via email, phone call, voicemail, and the website portal. Point of contact information is provided on all notifications to provide the public with various options to voice their comments. To elicit feedback on the proposed changes, the following outreach methods are utilized.

- Notification email and copies of Rider Notices to Honolulu City Council Members whose districts are affected by the proposals and the Transportation Committee Chair.
- Notification email and copies of Rider Notices to the Waipahu Neighborhood Board.
- A presentation was given to the Waipahu Neighborhood Board.
- Onboard interaction with riders on the proposed changes.
- Media Notifications by DTS Public Information Specialist. (i.e. Press Release, Twitter, Instagram).
- Rider Notices posted at affected bus stops along affected routes.
- Onboard notification and distribution of Rider Notices by bus operators of affected routes.

- Distribution of Rider Notices to selected developments, businesses, facilities, residents, etc. affected by the proposals.
- Notifications on TheBus.org website and linked to the DTS website.
- Notification email and copies of Rider Notices are provided to the Department of Human Services/Division of Vocational Rehabilitation/Hoopono Services for the Blind for distribution and are in a format on the website to use low sight features.
- Informational material on the website are available in a format to use the translation feature. Translation of notices into a required language(s) will be provided on request, unless the service area's neighborhood board/bus drivers indicate that translated notices are needed for the limited English population.

Title VI Policies and Definitions

DTS' Title VI Program contains the policies and procedures to determine if service changes are considered "major" and to evaluate the impact of major service changes to minority and low income populations.

Major Service Change Policy: Eliminating a route segment is defined as major service change that requires DTS to perform a service equity analysis during the planning phase prior to implementation.

Disparate Impact Policy: DTS determines the occurrence of a disparate impact when adverse effects of a major service change disproportionately affects minority populations by more than 10% based on the difference between the proportion of the total minority and non-minority populations in the total service area and the proportion of the affected minority and non-minority populations within the affected service area, a ½ mile radius of the route.

Disproportionate Burden Policy: DTS determines the occurrence of a disproportionate burden when adverse effects of a major service change disproportionately affects low income populations by more than 10% based on the difference between the proportion of the total low income and non-low income populations in the total service area and the proportion of the affected low income and non-low income populations within the affected service area, a ½ mile radius of the route.

Analysis Framework

Methodology: Title VI Population data by Census Block Groups retrieved from the Oahu Metropolitan Planning Organization (OMPO) and Route data from Remix were used to determine:

- Minority/non-minority and low income/non-low income proportion of the total service area population in the Census block groups served by the existing Route 43.

- Minority/non-minority and low income/non-low income proportion of the affected service area population located within a ½ mile radius of the existing Routes or new route(s).

The differences between the minority proportions and low-income proportions were calculated to determine disparate impact on minority populations and disproportionate burden on low-income populations. Differences exceeding 10% indicate that the major service change affected minority populations disparately and low-income populations disproportionately.

Table 1: Census Block Group Minority Populations – Existing

	Total Service Area			Affected Service Area			% Difference	Disparate
Route	Affected Population	Minority Population	% Minority	Affected Population	Minority Population	% Minority	Total-Affected Service Areas	Impact >10%
43	154,901	27,455	18%	116,700	27,600	24%	-6%	NO

Table 2: Census Block Group Low Income Populations – Existing

	Total Service Area			Affected Service Area				
Route	Affected Population	Low Income Population	% Low Income	Affected Population	Low Income Population	% Low Income	% Difference Total-Affected Service Areas	Disparate Impact >10%
43	154,901	4,206	3%	116,700	3,900	3%	0%	NO

Table 3: Census Block Group Minority Populations – Proposed

	Total Service Area			Affected Service Area			% Difference	Disparate
Route	Affected Population	Minority Population	% Minority	Affected Population	Minority Population	% Minority	Total-Affected Service Areas	Impact >10%
43	70,169	15,239	22%	52,700	14,400	27%	-5%	NO

Table 4: Census Block Group Low Income Populations – Proposed

	Total Service Area			Affected Service Area				
Route	Affected Population	Low Income Population	% Low Income	Affected Population	Low Income Population	% Low Income	% Difference Total-Affected Service Areas	Disparate Impact >10%
43	70,169	1,667	2%	52,700	1,300	2.5%	-0.5%	NO

Maps: (see Attachment 1)
Affected census block groups with minority and low income area block groups.

Assessing Impacts

Disparate Impact: The minority Census block group populations for the Routes' total service and affected service areas are shown in Table 1 and Table 3 above.

The proposed service changes to Routes 43 does not exceed the disparate impact policy threshold of 10% for the affected service areas as noted below:

- The minority population difference for Route 43 between the total service area and affected service area are -6% (existing) and -5% (proposed)

Disproportionate Burden: The low income Census block group populations for the Routes' total service and affected service areas are shown in Table 2 and Table 4 above.

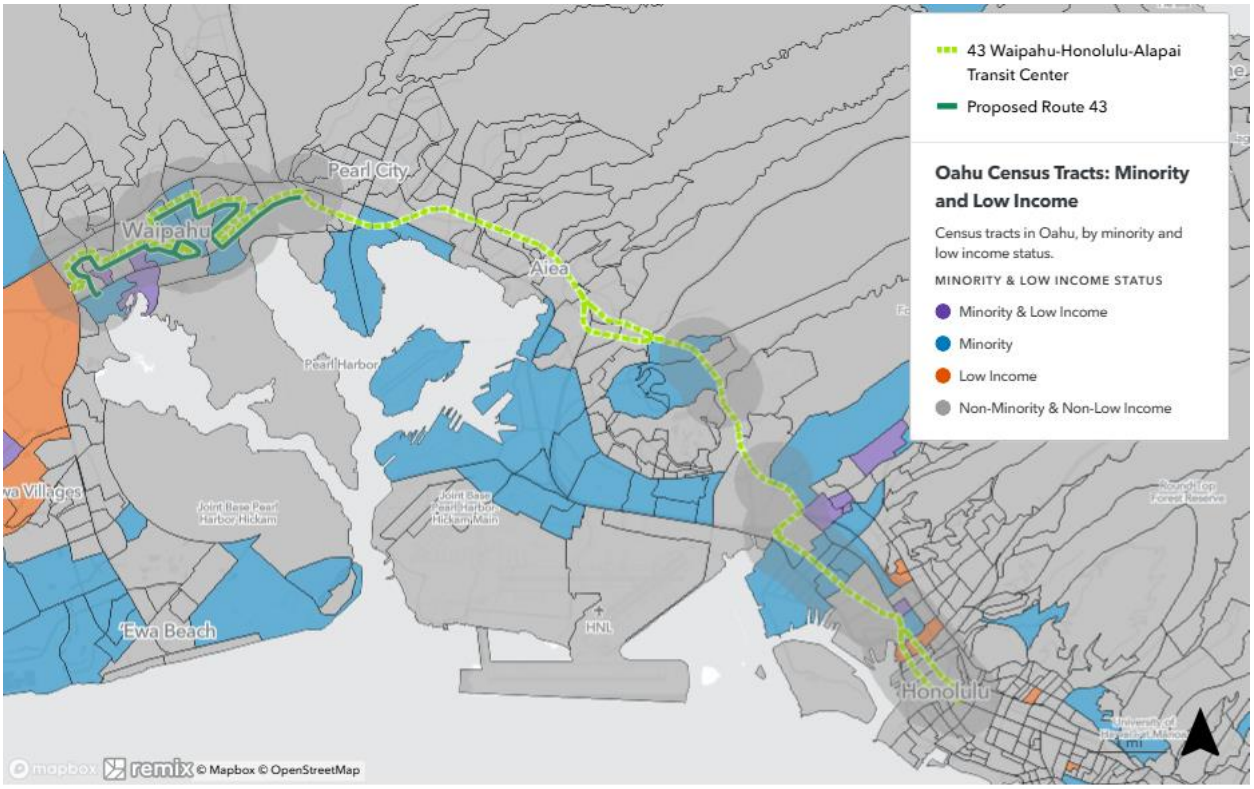
The proposed service changes to Route 43 do not exceed the disproportionate burden policy threshold of 10% for the affected service area as noted below:

- The low income population difference for Route 43 between the total service area and affected service area are 0% (existing) and -0.5% (proposed)

Service Equity Analysis

Based on the thresholds established in the DTS Major Service & Fare Change Policy and Disparate Impact & Disproportionate Burden Policies, the proposed service changes to Route 43 do not disproportionately affect minority and low income populations, and can be implemented as proposed.

Attachment 1:



Department of Transportation Services (DTS)
Transportation Mobility Division Title VI Program
Service Equity Analysis Report
Route(s): 303 Hickam-Airport-Kalihi Transit Center (2024)
Change(s): Segment Elimination

Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. DTS' 2022 Public Transit Title VI Program identifies the policies and procedures used to determine whether service change proposals are considered "major" and to evaluate the impact of major service changes on minority and low income populations.

Background

Route 303 provides hourly circulator service between Joint Base Pearl Harbor-Hickam (JBPHH), the airport, and Kalihi Transit Center. Ridership on this route is negligible, averaging approximately 0.3% of the system's ridership total. Accessing JBPHH requires security clearance and traffic queues are prevalent when entering.

Route 303's normal routing accessed JBPHH via Kuntz Gate and served Elliot Street and Kuntz Avenue. However, the military closed Kuntz Gate and a detour of Route 303 was necessitated. Serving both Kuntz Avenue and Elliot Street requires Kuntz Gate to be open. As such, service on Elliot Street has been discontinued. Route 303's detour route only serves Kuntz Avenue and requires the bus to turn around upon reaching Kuntz Gate. Route 303 has been serving Kuntz Avenue this way in both directions, which causes a significant time penalty. According to JBPHH, there are no plans to re-open Kuntz Gate.

Proposed Changes

We propose to:

- Reduce the frequency from 40 minutes to 60 minutes.
- Discontinue the Elliott Street and Kuntz Avenue segment.
- Modify route to continue on Nimitz Highway and enter JBPHH via O'Malley Boulevard.

Major Service Change Criteria

Based on the following criteria, the proposal to reduce the frequency of Route 303 and discontinue the Elliott Street and Kuntz Avenue segment is considered a major service change and does require a Service Equity Analysis.

> "Changing service levels for existing routes when ridership of the affected route exceeds 10% of system-wide ridership."

Annual ridership FY 2023:

System-wide:	38,992,508
Route 303:	133,792
Affected ridership:	0.3%

"Eliminating route segments when the affected ridership of the eliminated segment exceeds 10% of the route's total ridership."

Annual ridership FY 2023:

Route 303:	133,792
Eliminated segment:	24,388
Affected ridership:	18.2%

Public Outreach Activities

Public outreach and participation are important components when planning service changes. Riders/public are encouraged to provide comments and suggestions via email, phone call, voicemail, and the website portal. Point of contact information is provided on all notifications to provide the public with various options to voice their comments. To elicit feedback on the proposed changes, the following outreach methods are utilized.

- Notification email and copies of Rider Notices to Honolulu City Council Members whose districts are affected by the proposals and the Transportation Committee Chair.
- Notification email and copies of Rider Notices to the Neighborhood Boards affected by the proposals. (Presentation to be made upon request)
- Onboard interaction with riders on the proposed changes.
- Media Notifications by DTS Public Information Specialist. (i.e. Press Release, Twitter, Instagram).
- Rider Notices posted at affected bus stops.
- Onboard notification and distribution of Rider Notices by bus operators of affected routes.
- Distribution of Rider Notices to JBPHH.
- Notifications on TheBus.org website and linked to the DTS website.
- Notification email and copies of Rider Notices are provided to the Department of Human Services/Division of Vocational Rehabilitation/Hoopono Services for the Blind for distribution and are in a format on the website to use low sight features. Informational material on the website are available in a format to use the translation feature. Translation of notices into required language(s) will be provided on request, unless the service area's neighborhood board/bus drivers indicate that translated notices are needed for the limited English population.

Title VI Policies and Definitions

DTS' Title VI Program contains the policies and procedures to determine if service changes are considered "major" and to evaluate the impact of major service changes to minority and low income populations.

Major Service Change Policy: Eliminating a route segment is defined as major service change that requires DTS to perform a service equity analysis during the planning phase prior to implementation.

Disparate Impact Policy: DTS determines the occurrence of a disparate impact when adverse effects of a major service change disproportionately affects minority populations by more than 10% based on the difference between the proportion of the total minority and non-minority populations in the total service area and the proportion of the affected minority and non-minority populations within the affected service area, a ½ mile radius of the route.

Disproportionate Burden Policy: DTS determines the occurrence of a disproportionate burden when adverse effects of a major service change disproportionately affects low income populations by more than 10% based on the difference between the proportion of the total low income and non-low income populations in the total service area and the proportion of the affected low income and non-low income populations within the affected service area, a ½ mile radius of the route.

Analysis Framework

Methodology: Title VI Population data by Census Block Groups retrieved from the Oahu Metropolitan Planning Organization (OMPO) and Route data from Remix were used to determine:

- Minority/non-minority and low income/non-low-income proportion of the total service area population in the Census block groups served by the existing Route 303
- Minority/non-minority and low income/non-low-income proportion of the affected service area population located within a ½ mile radius of the existing Routes or new route(s)

The differences between the minority proportions and low-income proportions were calculated to determine disparate impact on minority populations and disproportionate burden on low-income populations. Differences exceeding 10% indicate that the major service change affected minority populations disparately and low-income populations disproportionately.

Table 1: Census Block Group Minority Populations – Existing

	Total Service Area			Affected Service Area			% Difference	Disparate
Route	Affected Population	Minority Population	% Minority	Affected Population	Minority Population	% Minority	Total-Affected Service Areas	Impact >10%
303	32,567	8,036	25%	15,200	2,700	18%	7%	NO

Table 2: Census Block Group Low Income Populations – Existing

Route	Total Service Area			Affected Service Area			% Difference	Disparate
	Affected Population	Low Income Population	% Low Income	Affected Population	Low Income Population	% Low Income	Total-Affected Service Areas	Impact >10%
303	32,567	886	3%	15,200	300	2%	1%	NO

Table 3: Census Block Group Minority Populations – Proposed

Route	Total Service Area			Affected Service Area			% Difference	Disparate
	Affected Population	Minority Population	% Minority	Affected Population	Minority Population	% Minority	Total-Affected Service Areas	Impact >10%
303	35,875	8,036	22%	15,800	2,800	18%	4%	NO

Table 4: Census Block Group Low Income Populations – Proposed

Route	Total Service Area			Affected Service Area			% Difference	Disparate
	Affected Population	Low Income Population	% Low Income	Affected Population	Low Income Population	% Low Income	Total-Affected Service Areas	Impact >10%
303	35,875	886	2.5%	15,800	300	2%	0.5%	NO

Maps: (see Attachment 1)
Affected census block groups with minority and low income area block groups.

Assessing Impacts

Disparate Impact: The minority Census block group populations for the Routes' total service and affected service areas are shown in Table 1 and Table 3 above.

The proposed service changes to Route 303 do not exceed the disparate impact policy threshold of 10% for the affected service areas as noted below:

- The minority population difference for Route 303 between the total service area and affected service area are 7% (existing) and 4% (proposed)

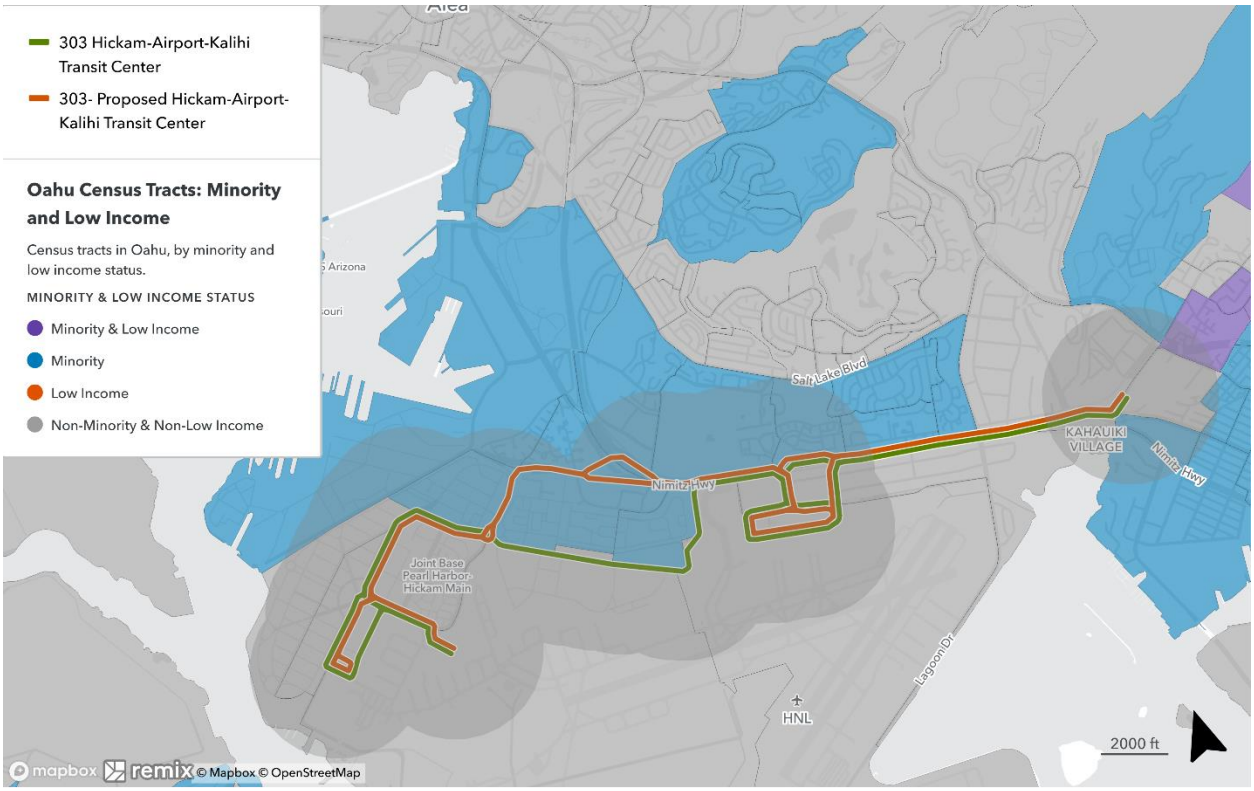
Disproportionate Burden: The low income Census block group populations for the Routes' total service and affected service areas are shown in Table 2 and Table 4 above.
The proposed service changes to Route 303 do not exceed the disproportionate burden policy threshold of 10% for the affected service area as noted below:

- The low income population difference for Route 303 between the total service area and affected service area are 1% (existing) and 0.5% (proposed)

Service Equity Analysis

Based on the thresholds established in the DTS Major Service & Fare Change Policy and Disparate Impact & Disproportionate Burden Policies, the proposed service changes to Route 303 do not disproportionately affect minority and low income populations, and can be implemented as proposed.

Attachment 1:



Department of Transportation Services (DTS)
Transportation Mobility Division Title VI Program
Service Equity Analysis Report
Route(s): 18 Kapahulu - University - Ala Moana (2024)
Change(s): Elimination

Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. DTS' 2022 Public Transit Title VI Program identifies the policies and procedures used to determine whether service change proposals are considered "major" and to evaluate the impact of major service changes on minority (TVI) and low income (EJ) populations.

Background

TheBus Route 18 operates hourly service between Ala Moana Shopping Center, the University of Hawaii at Manoa (UHM), and Kaimuki. With many service alternatives between Ala Moana Shopping Center and UHM, Route 18 is one of many supplementary routes that serve those destinations and the areas between them. Route 18 ridership is also low overall compared to other similar routes in the area. In an effort to reduce redundancies in TheBus transit network and reallocate resources to areas that are in need of more service, Route 18 is proposed to be permanently discontinued.

Proposed Changes

- Route 18 Elimination

Major Service Change Criteria

Based on the following criteria, the proposal to eliminate Route 18 does not meet the criteria for a "major" service change, and therefore, does not trigger the requirement for a Service Equity Analysis.

> "Eliminating routes when the affected ridership is greater than ten (10) passengers and the percentage of affected ridership exceeds 10% of system wide ridership (No major service change will be considered if similar alternate service is available on another existing route)."

Annual ridership FY 2023:	
System-wide:	38,992,508
Route 18:	157,379
Affected ridership:	0.4%

Alternate routes:

- Routes 13 & 14: between Kapahulu Shopping Center - St Louis Dr/Chaminade University
- Route 13: between Kapahulu Shopping Center - UH Manoa/Dole St/University Ave

- Route 4: between UH Manoa/University Ave - Wilder Ave/Pensacola St
- Route 102: between Wilder Ave/Keeaumoku St – Ala Moana Center
- Route 8: between Wilder Ave/Pensacola St – Ala Moana Center

Public Outreach Activities

Public outreach and participation are important components when implementing service changes. Riders/public are encouraged to provide comments and suggestions via email, phone call, voicemail, and the website portal. Point of contact information is provided on all notifications to provide the public with various options to voice their comments. Public outreach activities for Route 18 included:

- Notification email and copies of the Rider Notice to Honolulu City Council Members whose district are affected by the change and the Transportation Committee Chair.
- Notification email and copies of the Rider Notice to the Neighborhood Boards affected by the proposals.
- Presentations conducted at Neighborhood Boards affected by the proposals
- Rider notices posted at the affected bus stops along Route 18
- Onboard notification and distribution of Rider Notices by Route 18 Bus operators
- Notifications on TheBus.org website and linked to the DTS website
- Media notifications by DTS Public Information Specialist. (i.e. Press Release & social media platforms). Informational material on the website is available in a format to use the translation feature. Translation of notices into required language(s) will be provided on request, unless the service area's neighborhood board/bus operators indicate that translated notices are needed for the limited English population.

Department of Transportation Services (DTS)
Transportation Mobility Division Title VI Program
Service Equity Analysis Report
Route(s): 24 Kapahulu – Aina Haina (2024)
Change(s): Elimination

Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. DTS' 2022 Public Transit Title VI Program identifies the policies and procedures used to determine whether service change proposals are considered "major" and to evaluate the impact of major service changes on minority (TVI) and low income (EJ) populations.

Background

TheBus Route 24 operates hourly service between Kapahulu Ave in Kaimuki, the Honolulu Zoo, Kapiolani Community College (KCC) via Diamond Head Rd, Kahala Mall, and then to the Aina Haina community from Kalanianaole Hwy.

The purpose of Route 24 is to connect the Aina Haina community to trunk routes and other destinations. Route 24 has low ridership overall. It also shares similar routing with other bus routes that can fulfil similar roles with regards to its primary destinations previously mentioned. In an effort to reduce redundancies in TheBus transit network, optimize current similar routes, and reallocate resources to areas that are in need of more service, Route 24 is be proposed to be permanently discontinued.

Proposed Changes

- Route 24 Elimination

Major Service Change Criteria

Based on the following criteria, the proposal to eliminate Route 24 does not meet the criteria for a "major" service change, and therefore, does not trigger the requirement for a Service Equity Analysis.

> "Eliminating routes when the affected ridership is greater than ten (10) passengers and the percentage of affected ridership exceeds 10% of system wide ridership (No major service change will be considered if similar alternate service is available on another existing route)."

Annual ridership FY 2023:	
System-wide:	38,992,508
Route 24:	94,522
Affected Ridership:	0.2%

Alternate Routes:

- Proposed restructure of Route 23 (Kahala Mall - Sea Life Park) will serve Aina Haina and Kahala Mall.
- Route 2/2L services Kahala Mall, Kapiolani Community College, and Honolulu Zoo.
- Route 13 services Honolulu Zoo and the Kapahulu community.

Public Outreach Activities

Public outreach and participation are important components when implementing service changes. Riders/public are encouraged to provide comments and suggestions via email, phone call, voicemail, and the website portal. Point of contact information is provided on all notifications to provide the public with various options to voice their comments. Public outreach activities for Route 24 included:

- Notification email and copies of the Rider Notice to Honolulu City Council Members whose district are affected by the change and the Transportation Committee Chair.
- Notification email and copies of the Rider Notice to the Neighborhood Boards affected by the proposals.
- Presentations conducted to Neighborhood Boards affected by the proposals
- Rider notices posted at the affected bus stops along Route 24
- Onboard notification and distribution of Rider Notices by Route 24 Bus operators
- Notifications on TheBus.org website and linked to the DTS website
- Media notifications by DTS Public Information Specialist. (i.e. Press Release & social media platforms). Informational material on the website is available in a format to use the translation feature. Translation of notices into required language(s) will be provided on request, unless the service area's neighborhood board/bus operators indicate that translated notices are needed for the limited English population.

Department of Transportation Services (DTS)
Transportation Mobility Division Title VI Program
Service Equity Analysis Report
Route(s) 23 Ala Moana – Sea Life Park (2024)
Change(s): Segment Elimination and Route Extension

Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. DTS' 2022 Public Transit Title VI Program identifies the policies and procedures used to determine whether service change proposals are considered "major" and to evaluate the impact of major service changes on minority (TVI) and low income (EJ) populations.

Background

Route 23 is an hourly trunk service that provides service to riders traveling between Ala Moana, Waikiki, Kapiolani Community College (KCC), Kahala Mall, Hawaii Kai, and Sea Life Park. It also serves the Kalama Valley community in Hawaii Kai.

The purpose of Route 23 is to connect Kalama Valley and Hawaii kai to the urban core of Honolulu. The heaviest ridership is between Ala Moana Shopping Center and Kahala Mall, and is already supplemented with other routes that are more frequent.

Proposed Changes

The segment between Ala Moana Shopping Center and Kahala Mall will be eliminated and the segment along Kalanianaole Hwy between W Hind Drive and E Hind Drive will be eliminated. Route 23 will be rerouted to serve the Aina Haina community. The remainder of the route will remain unchanged.

Proposed Route 23

- No longer services Ala Moana, Waikiki, Kapahulu, Diamond Head, Kapiolani Community College, Kaimuki, and some areas of Kahala.
- New service segments: E Hind Drive, Hind luka Drive, Ani Street, Hao Street, Nohu Street, and W Hind Drive.

The proposed modifications to the proposed Route 23 will provide:

- Improved connectivity between suburban communities and main arterial roadways
- Less redundant service
- More reliable and predictable service
- New Service Area:
    - Aina Haina

Major Service Change Criteria

Based on the "Eliminating Route Segments" criteria, the proposed changes to the "old" Route 23 is considered a "major" service change requiring a Service Equity Analysis.

> "Eliminating route segments when the affected ridership of the eliminated segment exceeds 10% of the route's total ridership"

Annual ridership FY 2023:	
Route 23:	484,463
Eliminated Segments:	280,619
Affected ridership:	58%

Public Outreach Activities

Public outreach and participation are important components when implementing service changes. Riders/public are encouraged to provide comments and suggestions via email, phone call, voicemail, and the website portal. Point of contact information is provided on all notifications to provide the public with various options to voice their comments. Public outreach activities for Proposed Route 23 included:

- Notification email and copies of the Rider Notice to Honolulu City Council members whose districts are affected by the change and the Transportation Committee Chair.
- Notification email and copies of the Rider Notice to the Neighborhood Boards affected by the proposals.
- Presentations conducted to Neighborhood Boards affected by the proposals.
- Rider notices posted at the affected bus stops along Route 23.
- Onboard notification and distribution of Rider Notices by Route 23 bus operators.
- Notifications on TheBus.org website and linked to the DTS website.
- Media notifications by DTS Public Information Specialist. (i.e. Press Release & social media platforms).
- Informational material on the website is available in a format to use the translation feature. Translation of notices into required language(s) will be provided on request, unless the service area's neighborhood board/bus operators indicate that translated notices are needed for the limited English population.

Title VI Policies and Definitions

Major Service Change Policy: All "major" service changes require a Service Equity Analysis for Title VI purposes during the planning process and prior to implementation.
Disparate Impact Policy: DTS determines the occurrence of disparate impact when adverse effects of a major service change disproportionately affect minority populations by more than 10% based on the difference between the proportion of the total minority and non-minority populations within the affected service area, a ½ mile radius of the route.
Disproportionate Burden Policy: DTS determines the occurrence of a disproportionate burden when adverse effects of a major service change

disproportionately affect low income populations by more than 10% based on the difference between the proportion of the total income and non-low income populations in the total service area and the proportion of the affected low income and non-low income populations within the affected service area, a ½ mile radius of the route.

Analysis Framework

Methodology: Title VI Population data by Census Block Groups retrieved from the Oahu Metropolitan Planning Organization (OMPO) and Route data from Remix were used to determine:

- Minority/non-minority and low income/non-low income proportion of the total service area population in the Census block groups served by the existing Route 23
- Minority/non-minority and low income/non low income proportion of the affected service area population located within a ½ mile radius of the existing Route 23

The differences between the minority proportions and low income proportions were calculated to determine disparate impact on minority populations and disproportionate burden on low income populations. Differences exceeding 10% indicate that the major service change affected minority populations disparately and low income populations disproportionately.

Table 1: Census Block Group Minority Populations – Existing Route 23

	Total Service Area			Affected Service Area			% Difference Total-Affected Service Areas	Disparate Impact/Burden >10%
Route	Affected Population	Minority Population	% Minority	Affected Population	Minority Population	% Minority		
23	137,773	1575	1.1	94,800	270	1.7	0.6	No

Table 2: Census Block Group Low Income Populations – Existing Route 23

	Total Service Area			Affected Service Area			% Difference Total-Affected Service Areas	Disparate Impact/Burden >10%
Route	Affected Population	Low Income Population	% Low Income	Affected Population	Low Income Population	% Low Income		
23	137,773	468	0.03	94,800	3	0.003	0.027	No

Table 3: Census Block Group Minority Populations – Proposed Route 23

	Total Service Area			Affected Service Area			% Difference Total-Affected Service Areas	Disparate Impact/Burden >10%
Route	Affected Population	Minority Population	% Minority	Affected Population	Minority Population	% Minority		
23	66,846	1503	2.2	36,300	200	0.6	1.6	No

Table 4: Census Block Group Low Income Populations – Proposed Route 23

	Total Service Area			Affected Service Area			% Difference Total-Affected Service Areas	Disparate Impact/Burden >10%
Route	Affected Population	Low Income Population	% Low Income	Affected Population	Low Income Population	% Low Income		
23	66,846	0	0	36,300	0	0	0	No

Maps: (see Attachment 1)
Affected census block groups with minority and low income area block groups.

Assessing Impacts

Disparate Impact: The Minority Census block group populations for total service and affected service areas of the existing Route 23 are shown in Table 1 above and Table 3 shows the minority Census block group populations for total service and affected services of the proposed Route 23. The effects of the service changes do not exceed the disparate impact policy threshold of 10%.

- Existing Route 23: The minority population in the affected service area is 0.6% more than the minority population in the total service area.
- Proposed Route 23: The minority population in the affected service area is 1.6% less than the minority population in the total service area.

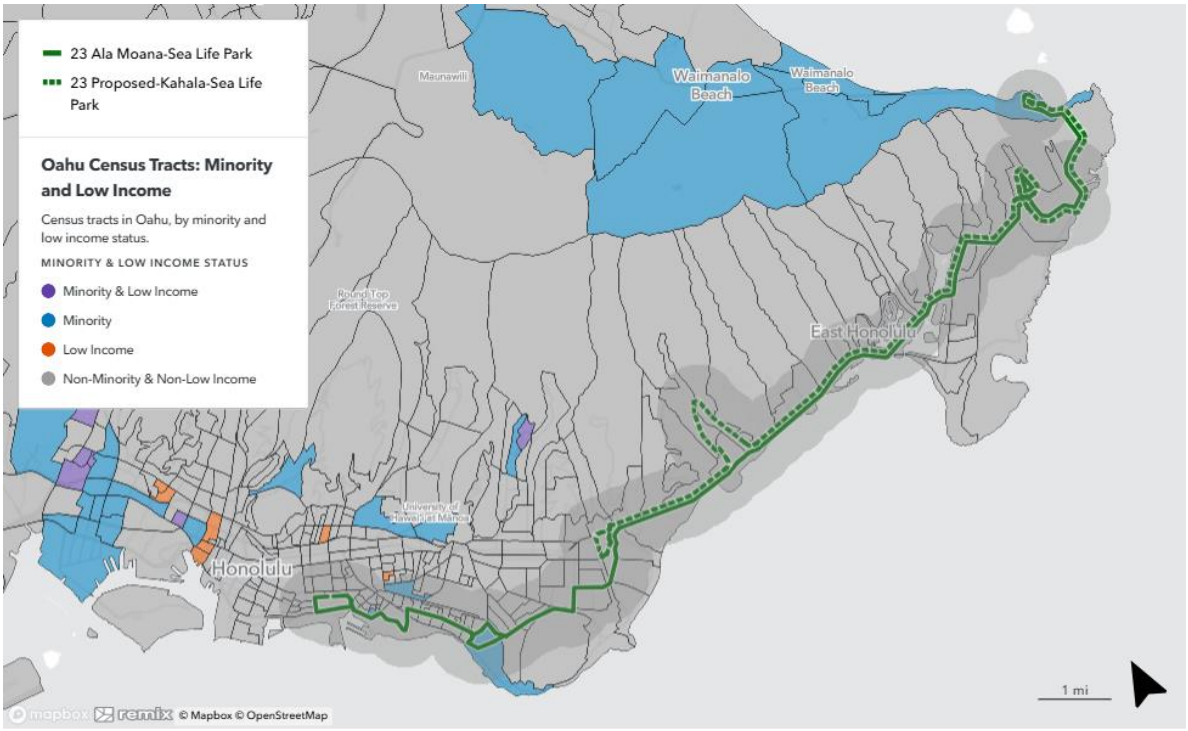
Disproportionate Burden: The low-income Census block group populations for total service and affected service areas of the existing Route 23 are shown in Table 2 and Table 4 shows the low-income Census block group populations for total service and affected service areas of the proposed Route 23. The effects of the service changes do not exceed the disproportionate burden policy threshold of 10%.

- Existing Route 23: The low-income population in the affected service area has a 0.027% less than the low-income population in the total service area.
- Proposed Route 23: The low-income population in the affected service area has a 0% difference than the low-income population in the total service area.

Service Equity Analysis

Based on the thresholds established in the Major Service & Fare Change Policy and Disparate Impact & Disproportionate Burden Policies, the proposed service changes do not disproportionately affect minority and low income populations, and can be implemented as proposed.

Attachment 1:



2025

Department of Transportation Services (DTS)
Transportation Mobility Division Title VI Program
Service Equity Analysis Report

Route(s):	**41 Kapolei-Ewa Beach**	**(2025)**
	44 Waipahu-Ewa Beach	**(2025)**
	415 Kapolei Transit Center-Kalaeloa	**(2025)**
	461 Makakilo-Palahia-UH West Oahu	**(2025)**
	New 47 UH West Oahu-Ewa Beach	**(2025)**

Change(s): Restructuring Routes and Establishing New Route

Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. DTS' 2022 Public Transit Title VI Program identifies the policies and procedures used to determine whether service change proposals are considered "major" and to evaluate the impact of major service changes on minority and low income populations.

Segment 1 of Skyline service started in June 2023. Skyline is operational between Kualakai East Kapolei Station and Hālawa Aloha Stadium Station. TheBus routes will continue to play an integral role of connecting Kapolei, Makakilo, and Ewa Beach communities to Skyline stations. Segment 2 of Skyline, which consists of the Honolulu International Airport (Airport), Joint Base Pearl Harbor Hickam (JBPHH), Lagoon Drive, and Middle Street Transit Center Skyline Stations is tentatively scheduled to be operational in late 2025. To facilitate the use of Skyline, bus service on the western side of Oahu plays a crucial role in the future transit network in Honolulu.

This report is the service equity analysis of the route restructures DTS is proposing for TheBus Routes 41, 44, 415, and 461; and establishment of New Route 47.

Background

With the development of commercial and residential communities in Kapolei and Ewa, a restructure of the bus routes in those areas is overdue. This effort helps facilitate the continuous development of Kapolei to be the "Second City" on Oahu. Skyline is another destination that attracts people who use transit to commute to/from Kapolei.

The main goals of restructuring bus routes in Kapolei, Makakilo, and Ewa Beach are to connect old and new communities to destinations such as Ewa Transit Center, Kapolei Transit Center, Skyline, Ka Makana Alii Shopping Center, and Kapolei Commons Shopping Center; and provide new service to communities and schools via roadways recently dedicated to the City such as Kapolei Pkwy.

Proposed Changes

Route 41 Kapolei-Ewa Beach

Route 41 provides service between Kapolei Transit Center and Ewa Beach Transit Center. Its existing service briefly serves Farrington Hwy, then transitions to local residential areas along Kealanani Ave and Kamaaha Ave then circling around Kapolei

Pkwy and Kamokuiki Street (near the Ka Makana Alii Shopping Center) on its way down to Franklin D. Roosevelt (FDR) Ave and Geiger Rd toward Ft Weaver Rd into Ewa Beach. The modified Route 41 will no longer serve Farrington Hwy, Kealanani Ave and Kamaaha Ave, but instead will serve Kamokila Blvd toward FDR Ave and Ka Makana Alii Shopping Center. Upon the conditional permission from the mall, bus access will be granted to provide service within the mall's parking lot. Route 41 will then utilize Kapolei Pkwy upon its exit from the mall and provide service through Ewa Beach and the southern segment of Ft Weaver Rd like the existing Route 41. Geiger Rd and a majority of Ft Weaver Rd will no longer be served. Geiger Rd has low ridership and Ft Weaver Rd has other bus routes that riders can use. As a tradeoff, due to increased demand, Kapolei Pkwy will be utilized.

Route 44 Waipahu-Ewa Beach

Route 44 provides service between Waipahu and Ewa Beach via major arterial roads such as Fort Weaver Road, Renton Rd, and Geiger Rd. Bus service is then distributed throughout local roads that wrap back to Ft Weaver until it makes a return the other direction once it reaches the end of Ft Weaver. With this restructure, Route 44 will provide service between Waipahu and the Keoneae UH West Oahu (UH WEST) Skyline Station via Renton Rd and Ka Makana Alii Shopping Center. New Route 47 will cover most of the existing Route 44 in Ewa Beach but will connect to UH WEST instead.

Route 415 Kapolei Transit Center-Kalaeloa

Route 415 provides service between the Kapolei Transit Center and Kalaeloa utilizing Ft Barrette Rd as the connecting road. The modified Route 415 will be expanded and will travel on arterial roads like Kamokila Blvd, FDR Ave, and Kapolei Pkwy. The modified Route 415 will operate in a one-way, counter clockwise loop and will also serve the Villages of Kapolei community before returning to the Kapolei Transit Center.

Route 461 Makakilo-Palahia-UH West Oahu

Route 461 provides service for Makakilo residents to connect them to UH WEST via Kealanani Ave, Kamaaha Ave, Kapolei Pkwy, and Kualakai Pkwy. The modified Route 461 will continue on Farrington Hwy from Makakilo Dr, which will provide a more direct connection with UH WEST. The Villages of Kapolei segment will be disconnected from the modified Route 461 and will be served by the modified Route 415.

New Route 47 UH West Oahu-Ewa Beach

The New Route 47 will be a modified version of the existing Route 44. The restructured Route 44 will provide service between UH WEST and Waipahu. New Route 47 will absorb the Ewa Beach portion of the existing Route 44 but it will connect to UH WEST instead of Waipahu.

Major Service Change Criteria

Based on the following criteria, the proposal to eliminate segments of Route 41 and Route 461 does meets the criteria for a "major" service change, and therefore, triggers the requirement for a Service Equity Analysis.

> "Eliminating route segments when the affected ridership of the eliminated segment exceeds 10% of the route's total ridership."

Annual ridership FY 2024:

Route 41:	179,808
Eliminated segment:	101,896
Affected ridership:	57%

Annual ridership July 2024 (Opened):

Route 461:	55,840
Eliminated segment:	15,756
Affected ridership:	28%

Based on the following criteria, the proposal to eliminate segments of Route 44 and Route 415, does not meet the criteria for a "major" service change, and therefore, did NOT trigger the requirement for a Service Equity Analysis.

> "Eliminating route segments when the affected ridership of the eliminated segment exceeds 10% of the route's total ridership."

Annual ridership FY 2024:

Route 44:	193,150
Eliminated segment:	9,850
Affected ridership:	5%

Annual ridership FY 2024:

Route 415:	92,554
Eliminated segment:	4,702
Affected ridership:	5%

Based on the "Establishing New Routes" criteria for new bus service (Route 47) the proposed changes are considered a "major" service change requiring a Service Equity Analysis.

> "Establishing new routes when the population within a ½ mile radius of the proposed route exceeds 25% of the service area population (Census blocks)."

Census blocks 2020

Service Area Population:	81,492
New Route 47 population within ½ mile radius:	59,300 = 73%

Public Engagement Process

Public outreach and participation are important components when implementing service changes. Riders/public are encouraged to provide comments and suggestions via email, phone call, voicemail, and the website portal. Point of contact information is provided on all notifications to provide the public with various options to voice their comments. Public outreach activities for Proposed Ewa-Kapolei-Makakilo Restructure included:

- Notification email and copies of the Survey and Rider Notice to Honolulu City Council members whose districts are affected by the change and the Transportation Committee Chair.
- Notification email and copies of the Survey and Rider Notice to the Ewa and Kapolei/Makakilo/Honokai Hale Neighborhood Boards.
- Presentations conducted at the Ewa and Kapolei/Makakilo/Honokai Hale Neighborhood Boards.
- Rider notices posted at the affected bus stops.
- Notifications on TheBus.org website and linked to the DTS website.
- Informational material on the website is available in a format to use the translation feature. Translation of notices into required language(s) will be provided on request, unless the service area's neighborhood board/bus operators indicate that translated notices are needed for the limited English population.

Title VI Policies and Definitions

DTS' Title VI Program contains the policies and procedures to determine if service changes are considered "major" and to evaluate the impact of major service changes to minority and low income populations.

Major Service Change Policy: Eliminating a route segment is defined as major service change that requires DTS to perform a service equity analysis during the planning phase prior to implementation.

Disparate Impact Policy: DTS determines the occurrence of a disparate impact when adverse effects of a major service change disproportionately affects minority populations by more than 10% based on the difference between the proportion of the total minority and non-minority populations in the total service area and the proportion of the affected minority and non-minority populations within the affected service area, a ½ mile radius of the route.

Disproportionate Burden Policy: DTS determines the occurrence of a disproportionate burden when adverse effects of a major service change disproportionately affects low income populations by more than 10% based on the difference between the proportion of the total low income and non-low income populations in the total service area and the proportion of the affected low income and non-low income populations within the affected service area, a ½ mile radius of the route.

Analysis Framework

Methodology: Title VI Population data by Census Block Groups retrieved from the Oahu Metropolitan Planning Organization (OMPO) and Route data from Remix were used to determine:

- Minority/non-minority and low income/non-low-income proportion of the total service area population in the Census block groups served by the existing Route

41 and 461, and new route 47

- Minority/non-minority and low income/non-low-income proportion of the affected service area population located within a ½ mile radius of the existing Routes or new route(s)

The differences between the minority proportions and low-income proportions were calculated to determine disparate impact on minority populations and disproportionate burden on low-income populations. Differences exceeding 10% indicate that the major service change affected minority populations disparately and low-income populations disproportionately.

Table 1: Census Block Group Minority Populations – Existing

	Total Service Area			Affected Service Area			% Difference	Disparate
Route	Affected Population	Minority Population	% Minority	Affected Population	Minority Population	% Minority	Total-Affected Service Areas	Impact >10%
41	87,910	7,757	9%	57,400	4,600	8%	1%	NO
461	50,195	5,359	11%	34,200	3,400	10%	1%	NO

Table 2: Census Block Group Low Income Populations – Existing

	Total Service Area			Affected Service Area				
Route	Affected Population	Low Income Population	% Low Income	Affected Population	Low Income Population	% Low Income	% Difference Total-Affected Service Areas	Disparate Impact >10%
41	87,910	1,467	2%	57,400	300	0.5%	1.5%	NO
461	50,195	1,702	3%	34,200	1,100	3%	0%	NO

Table 3: Census Block Group Minority Populations – Proposed

	Total Service Area			Affected Service Area			% Difference	Disparate
Route	Affected Population	Minority Population	% Minority	Affected Population	Minority Population	% Minority	Total-Affected Service Areas	Impact >10%
41	84,335	8,219	10%	53,300	5,000	9%	1%	NO
461	34,800	2,300	7%	22,400	800	4%	3%	NO
47	81,492	7,505	9%	59,300	4,500	8%	1%	NO

Table 4: Census Block Group Low Income Populations – Proposed

	Total Service Area			Affected Service Area				
Route	Affected Population	Low Income Population	% Low Income	Affected Population	Low Income Population	% Low Income	% Difference Total-Affected Service Areas	Disparate Impact >10%
41	84,335	1,467	2%	53,300	700	1%	1%	NO
461	34,800	1,300	4%	22,400	700	3%	1%	NO
47	81,492	1,767	2%	59,300	1,000	2%	0%	NO

Maps: (see Attachment 1)

Affected census block groups with minority and low income area block groups.

Assessing Impacts

Disparate Impact: The minority Census block group populations for the Routes' total service and affected service areas are shown in Table 1 and Table 3 above.

The proposed service changes to Routes 41 and 461, and establishment of New Route 47 do not exceed the disparate impact policy threshold of 10% for the affected service areas as noted below:

- The minority population difference for Route 41 between the total service area and affected service area are 1% (existing) and 1% (proposed)
- The minority population difference for Route 461 between the total service area and affected service area are 1% (existing) and 3% (proposed)
- The minority population difference for Route 47 between the total service area and affected service area is 1% (proposed) – new route.

Disproportionate Burden: The low income Census block group populations for the Routes' total service and affected service areas are shown in Table 2 and Table 4 above.

The proposed service changes to Routes 41 and 461, and establishment of New Route 47 do not exceed the disproportionate burden policy threshold of 10% for the affected service area as noted below:

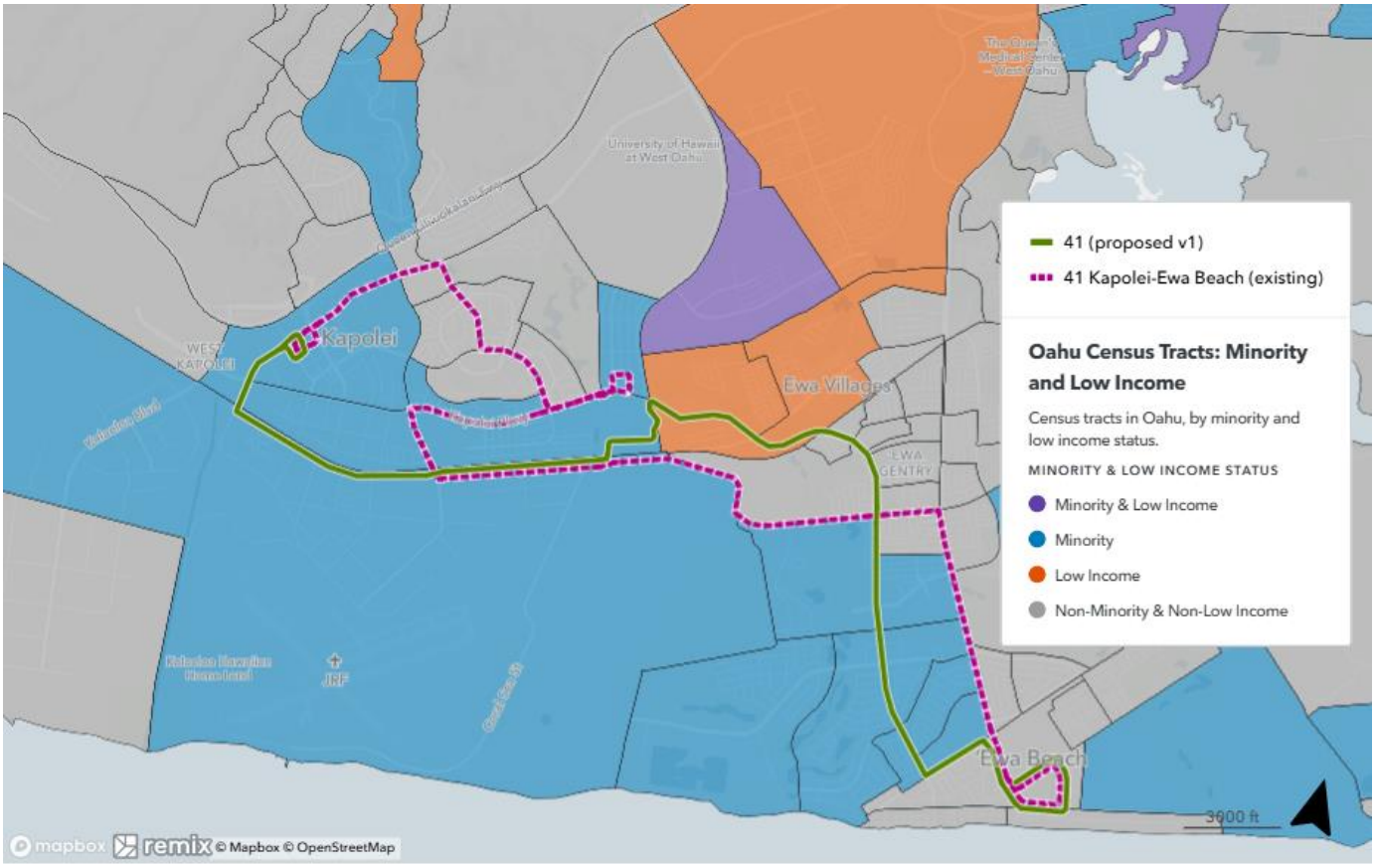
- The low income population difference for Route 41 between the total service area and affected service area are 1.5% (existing) and 1% (proposed)
- The low income population difference for Route 461 between the total service area and affected service area are 0% (existing) and 1% (proposed)
- The low income population difference for Route 47 between the total service area and affected service area is 0% (proposed) – new route.

Service Equity Analysis

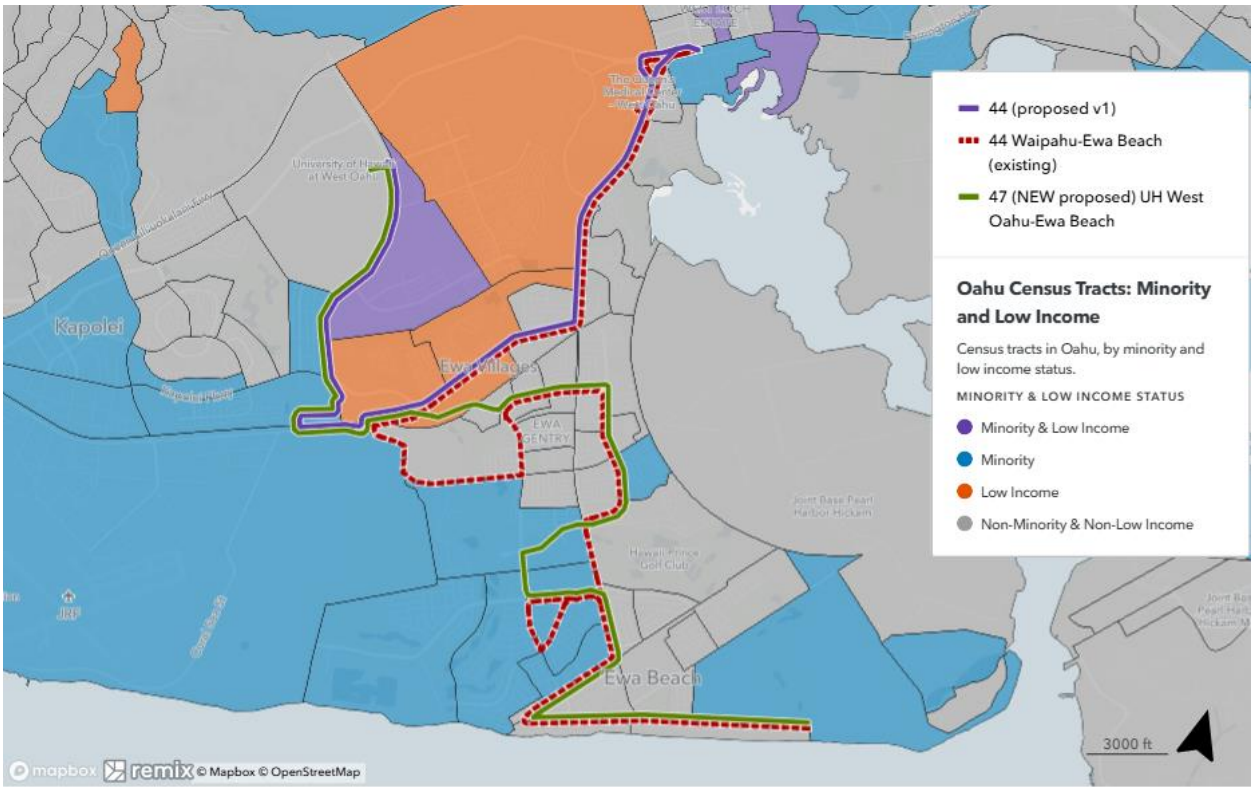
Based on the thresholds established in the DTS Major Service & Fare Change Policy and Disparate Impact & Disproportionate Burden Policies, the proposed service changes to Routes 41 and 461, and establishment New Route 47 do not disproportionately affect minority and low income populations, and can be implemented as proposed.

Attachment 1:

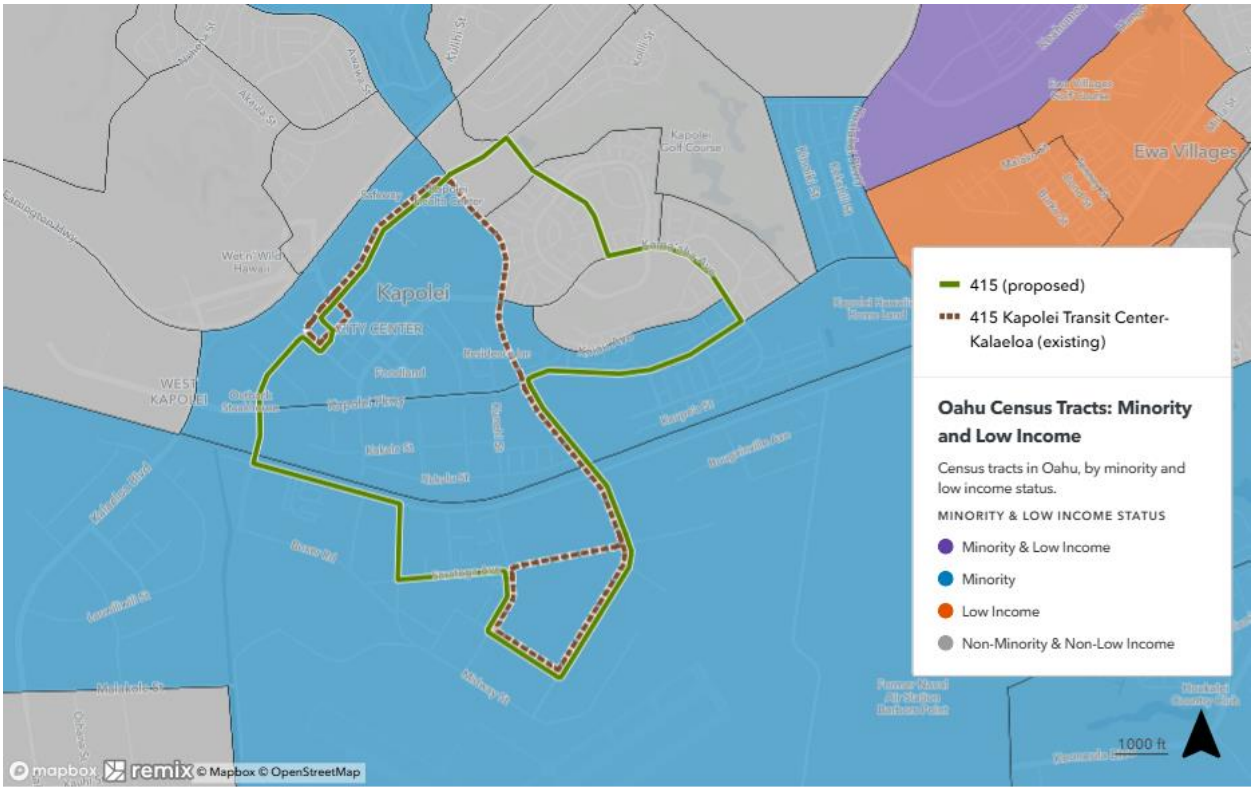
Route 41- proposed and existing



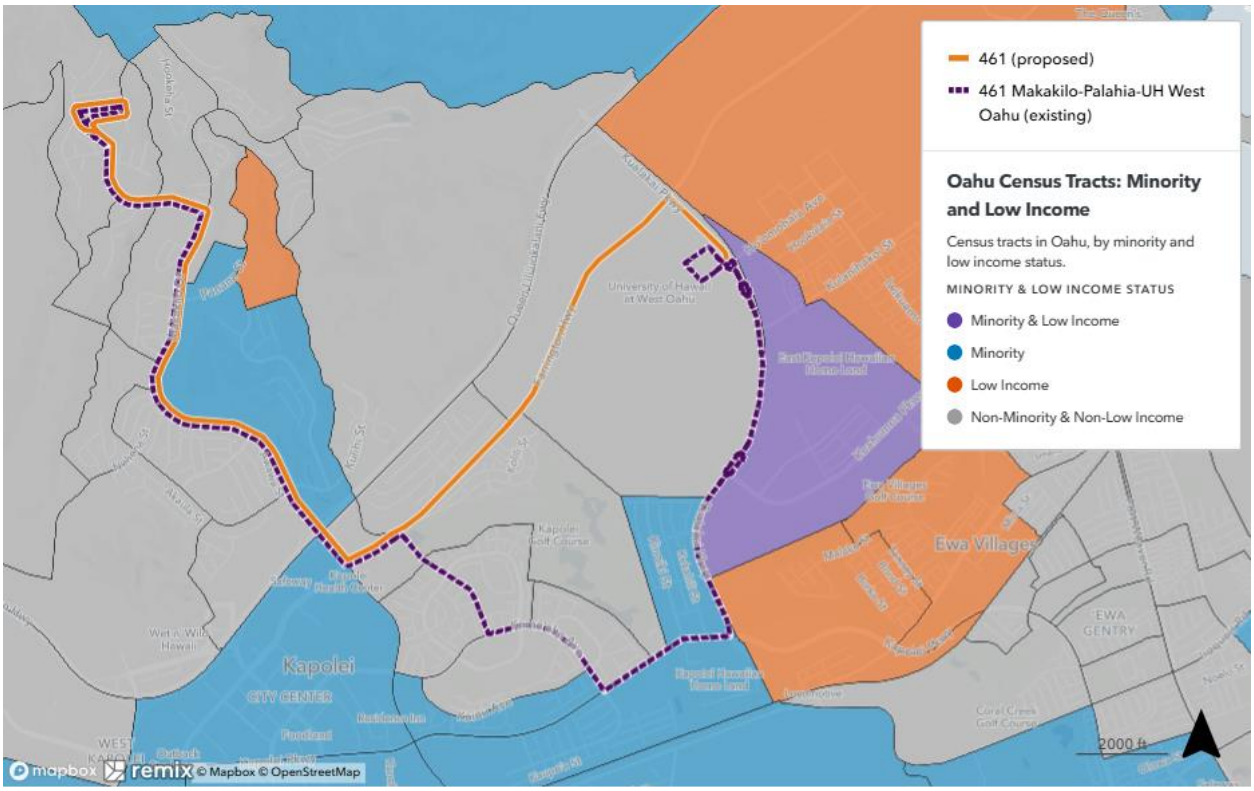
Route 44 – proposed and existing and New Route 47- proposed



Route 415 – proposed and existing



Route 461 – proposed and existing



Department of Transportation Services (DTS)
Transportation Mobility Division Title VI Program
Fare Change Equity Analysis Report
July 2025 Fare Increase
Change(s): Fare Increase

Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. This analysis was conducted in compliance with Federal Transit Administration (FTA) Circular 4702.1B, which requires any FTA recipient providing 50 or more fixed route vehicles in peak service located in an urbanized area and serving a population of 200,000 or greater to evaluate any fare changes at the planning and programming stages to determine whether those changes have a disparate impact on minority populations and disproportionate burden on low income populations.

This report is the fare equity analysis of the proposed fare increases to adult, one-day, youth, senior, and disability passes; and adult cash single fare. Proposed implementation is scheduled for 2025.

FTA Circular 4702.1B requires transit providers to analyze ridership data in order to determine whether a potential Disparate Impact or Disproportionate Burden is likely to occur as a result of the provider's proposed fare changes. Circular 4702.1B states that transit provider shall conduct the analysis in the following manner:

1. Determine the number and percent of users of each fare media being changed;
2. Review fares before the change and after the change;
3. Compare the differences for each particular fare media between minority users and overall users; and
4. Compare the differences for each particular fare media between low-income users and overall users.

Background

The Honolulu City Council (Council) sets public transit fare rates by amending the Revised Ordinances of Honolulu (ROH), Chapter 15B: Public Transit, Article 2: Island Wide Fare Structure, Section 15B-2.1(b) Fare Structure Table. In January 2001, Council Resolution No. 00-29 CD-1 was passed and established a policy on funding the operating cost of the City and County of Honolulu (City) bus system. According to Resolution No. 00-29 CD-1, bus fares were adjusted so the fare box recovery ratio did not fall below 27% nor exceed 33%.

In 2019, with Council Resolution 19-10 the recommended fare box recovery policy was changed from 27%-33% to 25%-30%. In fiscal year (FY) 2020 fare box recovery was expected to be 24.04% but the COVID-19 pandemic caused severe service disruptions starting in March 2020. Plummeting ridership continued to follow suit when in FY 2021, the fare box recovery reached 11.45%.

The Honolulu Rate Commission was established in 2017, following a recommendation from the Honolulu Charter Commission. The purpose of the Rate Commission is to review the fares, fees, rates, tolls and other charges for the use of any and all modes of the multimodal municipal transportation system. The Rate Commission recommends adjustments, such that the revenues derived from fares, in conjunction with any other revenues allocated to the multimodal municipal transportation system, is sufficient or as nearly sufficient as possible, to support the operation and maintenance of the multimodal municipal transportation system. In making recommendations on fares, fees, rates, tolls and other charges, the Rate Commission may also consider factors such as transportation equity, accessibility, sustainability, availability, and effect on ridership. (Revised Charter of Honolulu, Section 6-1705)

The last fare change was in July 2022. With the rising cost of operating transit, which includes gas, salaries, and etc., raising fares are being proposed.

A proposed change is adding a $0.25 surcharge for all cash payments aboard the bus. The intention of having a surcharge for cash payments is to incentivize HOLO card use for efficient fare collection and the gradual elimination of cash collection. The cash collection process is another increasing cost on the whole transit system that may one day cost more than what is received from cash fares.

Although an increase to the para-transit fare is also proposed, but a fare equity analysis is not required for fare changes to demand /response service and is not included in this report.

Proposed Changes

- Cash fares will include $0.25 surcharge; no charge for HOLO card use.
- Increases in monthly pass fares for Adults (from $80 to **$90**) and Youth (from $40 to **$45**).
- Increase reduced fare* (low income, Senior, and Disability) for single ride from $1.25 to **$1.50**.
- Increase reduced fare annual pass from $45 to **$50**.
- Increase 7-day pass cost from $35 to **$40.**
- Eliminate the $1.5 million budget cap for the low-income fare program.
- There are no proposed changes to single fares for Adult and Youth HOLO card users.

  *Those eligible individuals with Low Income (applied and deemed qualified through the City's Department of Community Services (DCS) Low Income Transit Fare Program) are classified under "reduced fares" category.

Public Engagement Process

Note: The public is able to provide testimony and participate in Rate Commission meetings. Full minutes of Rate Commission meetings are available for public view here: https://www4.honolulu.gov/docushare/dsweb/View/Collection-2800

October 2024:

The Rate Commission inquired whether the public had testimony of the Annual Review of Fares, Fees, Rates, Tolls and Other Charges after discussion and presentation of the rising costs, fare structure, and intentions for the fare proposals.

November 2024:

Rate Commission held testimony for its meeting and have collected 19 pieces of testimony prior to the meeting and read the names of those who submitted written comments. The commission would consider the testimony received as they formulate their recommendations to DTS, the Mayor and the City Council.

A public service announcement was advertised on DTS website, new channels, and newspaper for input on recommended policy changes.

December 2024:

Rate Commission invites more public comment and testimony on proposed policy changes. A public service announcement was advertised on DTS website, new channels, and newspaper for input on recommended policy changes.

January 2025:

Rate Commission continued to review public testimonies and recommendations on its proposed fare structure

February 2025:

Rate Commission invites more public comment and testimony on any proposed policy changes. A public service announcement is announced on February 6, 2025. The Commission will also be accepting in-person testimony at community meetings on the following dates and times at these locations:

Monday, February 10, 2025 at 7:30 p.m. Kapolei Hale, 1000 Ulu‘ōhi‘a Street, Conference Rooms A&B
Tuesday, February 11, 2025 at 6:30 p.m. Kapālama Hale, 925 Dillingham Boulevard, Room 277
Thursday, February 13, 2025 at 6:30 p.m. Kāne‘ohe District Park, 45-660 Kea‘ahala Road, Meeting Room 2

Title VI Policies

DTS’ Title VI Program contains the policies and procedures to determine if the proposed fare changes will have a disparate impact to minority populations and disproportionate burden to low income populations.

Fare Change Policy: All fare changes (increase or decrease) requires DTS to perform a fare equity analysis during the planning process prior to approval/adoption by Council and subsequent implementation.

Disparate Impact Policy: DTS determines disparate impact when adverse effects of a fare change disproportionately affects minority populations more than non-minority populations.

NOTE: Because this is a fare change that would affect all bus routes, a disparate impact would affect total minority and non-minority populations entirely regardless of service area.

Disproportionate Burden Policy: DTS determines disproportionate burden when adverse effects of a fare change disproportionately affects low income populations more than non-low income populations.

NOTE: Because this is a fare change that would affect all bus routes, a disproportionate burden would affect total minority and non-minority populations entirely regardless of service area.

Procedures: If the equity analysis determines that there is no disparate impact to the affected minority population and/or no disproportionate burden to the affected low-income population, DTS-TMD will continue the planning/implementation process of the proposed change. The process will include coordination with council member(s) from the district(s) affected by change(s) and presentation to the public for comments. Results will included in the TVI Program submitted to FTA every three years.

If the equity analysis determines that there is a disparate impact to the affected minority population and/or a disproportionate burden to the affected low-income population, DTS-TMD will review/revise planned changes to avoid, minimize, or mitigate such impacts and conduct another equity analysis on the revised changes to determine that the revised changes do not disproportionately affect minority and/or low-income populations more than non-minority and/or non-low-income populations. Potential adverse effects to minority and/or low-income populations include but not limited to: service changes that reduce service (i.e. eliminate route(s) or segments of routes, remove trips on a route, change span of service), change the frequency of service (i.e. headway), or fare increases.

If DTS-TMD chooses not to alter the proposed changes despite the potential disparate impact and/or a disproportionate burden on minority/low-income populations, or if DTS-TMD finds, even after revisions, that minority/low-income riders will continue to bear a disproportionate share of the proposed changes, the change may be implemented only if:

1. there is a substantial legitimate justification for the proposed change, and
2. it can be demonstrated that there are no alternatives that would have a less disparate impact on minority/low-income riders but would still accomplish legitimate program goals. In order to make this choice, DTS-TMD must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on minorities/low-income riders, and

then implement the least discriminatory alternative.

Analysis Framework

1. Determine the number and percent of users of each fare media being changed

Methodology: Using the Honolulu Transit Comprehensive Operations Analysis Task 1 On-Board Survey, Cambridge Systematics conducted on-board surveys between August 2021 – January 2022. Using the survey, DTS was able to identify fare media usage by group according to fare type (Table 1). The survey samples are a representative sample of total overall ridership on all fixed routes and is random. Survey participants that were low-income were identified by the income level they selected on the survey (this data uses 2021 Federal poverty income guidelines for Hawaii to identify low income levels) whereas minority were what they identified by the subgroup ethnicity they selected. There were approximately 5388 possible survey participants. The data reflects only those who answered the survey questions regarding fare usage. Youth were not surveyed and is thus omitted from this analysis. Changes to annual and 7-day passes were not covered as no annual and 7-day passes were collected for those surveyed. City's DCS's Low Income Transit Fare Program pass holders were also not surveyed and will not be covered in this analysis.

The "Usage by Group" in Table 1 represents the number of participants with selected usage. The "Usage by Percentage," represents the percentage from the total of each fare type column.

*Surveying youth (younger than 18 years old) is difficult because it requires consent from an adult.

Table 1: Fare Media Usage

	Usage by Group			Usage by Percentage		
Fare Type	Low-income	Minority	Overall	Low-income	Minority	Overall
Adult	314	905	314	26.2%	25.9%	34%
Youth	N/A	N/A	N/A	N/A	N/A	N/A
Senior	6	37	12	0.5%	1.1%	1.3%
Disability	4	15	2	0.3%	0.4%	0.22%
Adult Monthly	558	1738	263	46.5%	49.7%	28.5%
Youth Monthly	N/A	N/A	N/A	N/A	N/A	N/A
Senior Monthly	62	16	13	5.2%	0.45%	1.4%
Disability Monthly	20	35	5	1.7%	1%	0.54%
Cash (all types)	235	750	314	19.6%	21.45%	34%
Total	1199	3496	923	100%	100%	100%

The highlighted in Table 1 shows the greater impacts a fare change would have for a specific group based off their percentage of fare media usage.

- For adult fare (that includes single fare and one-day fare), it would affect the overall riders more.
- For senior fare (that includes single fare and one-day fare), it would affect overall riders more.
- For disability fare (that includes single fare and one-day fare), it would affect both low-income and minority riders more but all three categories are negligible when considering their low usage and relative similar numbers.
- For adult monthly fare, it would affect both low income and minority riders more
- For senior monthly fare, it would affect low income more.
- For disability monthly fare, it would affect both low income and minority riders more.
- For Cash fares, it would affect overall more.

2. Review fares before the change and after the change

The proposed fare structure increases is determined by the Rate Commission and discussed with City Council with consideration to rising costs, farebox recovery, fare caps, and integration of the future Honolulu Rail System for operation*.

*The Rate Commission is aiming to keep the same fare rate for Skyline and TheBus for bus-rail integration to ease transfers.

Table 2: Fare Changes Before and After

	Cost		Change	
Fare Type	Existing (2022)	Proposed (2025)	Absolute	%
Adult	$3.00	$3.00	$0.00	0%
Youth	$1.50	$1.50	$0.00	0%
Senior (reduced fare)	$1.25	$1.50	$0.25	20%
Disability (reduced fare)	$1.25	$1.50	$0.25	20%
Adult Monthly	$80.00	$90.00	$10.00	12.5%
Youth Monthly	$40.00	$45.00	$5.00	12.5%
Senior Monthly	$20.00	$20.00	$0.00	0%
Disability Monthly	$20.00	$20.00	$0.00	0%
HOLO card fee	$2.00	$2.00	$0.00	0%
Cash* surcharge	$0	$0.25	$0.25	N/A

*Cash fares are currently the same with HOLO card fares according to fare type but will include a cash surcharge for this proposal.

3. Compare the differences for each particular fare media between minority users and overall users

Table 3: Difference Between Minority and Overall Users

	Absolute Value *(the number of participants with selected usage)*		Percent *(from the total of each fare type column)*		Difference (Minority-Overall)
Fare Type	Minority	Overall	Minority	Overall	%
Adult	905	314	25.9%	34%	-8.1%
Youth	N/A	N/A	N/A	N/A	N/A
Senior	37	12	1.1%	1.3%	-0.2%
Disability	15	2	0.4%	0.22%	0.18%
Adult Monthly	1738	263	49.7%	28.5%	21.2%
Youth Monthly	N/A	N/A	N/A	N/A	N/A
Senior Monthly	16	13	0.45%	1.4%	-0.95
Disability Monthly	35	5	1%	0.54%	0.46
Cash (all types)	750	314	21.45%	34%	-12.55
Total	3496	923	100%	100%	

Looking at the “Difference” in Table 3, Disability (0.18%), Adult Monthly (21.2%), and Disability Monthly fares (0.46%) will have more minority populations by percentage impacted by the fare changes.

4. Compare the differences for each particular fare media between low-income users and overall users.

Table 4: Difference Between Low-income and Overall Users

	Absolute Value *(the number of participants with selected usage)*		Percent *(from the total of each fare type column)*		Difference (Low-income-Overall)
Fare Type	Low-income	Overall	Low-income	Overall	%
Adult	314	314	26.2%	34%	-7.8%
Youth	N/A	N/A	N/A	N/A	N/A
Senior	6	12	0.5%	1.3%	-0.8%
Disability	4	2	0.3%	0.22%	0.08%
Adult Monthly	558	263	46.5%	28.5%	18%
Youth Monthly	N/A	N/A	N/A	N/A	N/A
Senior Monthly	62	13	5.2%	1.4%	3.8%
Disability Monthly	20	5	1.7%	0.54%	1.16%
Cash (all types)	235	314	19.6%	34%	-14.4%
Total	1199	923	100%	100%	

Looking at the “Difference” in Table 4, Disability (0.08%), Adult Monthly (18%), Senior Monthly (3.8%), and Disability Monthly (1.16%) fares will have more low-income populations by percentage impacted by the fare changes.

Assessing Impacts

Using the survey sample to represent the total ridership, increasing fares will affect both low income and minority riders more in regards to their usage of the different fare media. Thus, the greater the usage of a fare type by a group, the more impact a fare change would have in comparison to another group that does not use it as much. Table 5 shows the fare change in relation to the amount the total number low-income or minority riders will have to pay compared to overall riders. It also shows that fare media sales are made up of mostly low income (21.4%) and minority (68.3%) riders among the three groups.

Disparate Impact and Disproportionate Burden: Based on the survey and the analysis from the numbers presented, both a disparate impact and disproportionate burden exists, particularly for the change in Adult Monthly fares (the difference of 21.2% for minority riders (Table 3) and 18% for low income riders (Table 4) in comparison with overall riders.

Table 5: Usage and Average Fare Change

	Usage by Group			Average Fare Change				
Fare Type	Low-income	Minority	Overall	Fare Change %	Fare Change $	Low-income	Minority	Overall
Adult	314	905	314	0%	$0.00	$0	$0	$0
Youth	N/A	N/A	N/A	0%	$0.00	N/A	N/A	N/A
Senior (reduced fare)	6	37	12	20%	$0.25	$1.50	$9.25	$3.00
Disability (reduced fare)	4	15	2	20%	$0.25	$1.00	$3.75	$0.50
Adult Monthly	558	1738	263	12.5%	$10.00	$5580	$17830	$2630
Youth Monthly	N/A	N/A	N/A	12.5%	$5.00	N/A	N/A	N/A
Senior Monthly	62	16	13	0%	$0.00	$0	$0	$0
Disability Monthly	20	35	5	0%	$0.00	$0	$0	$0
Cash (all types)	235	750	314	8-20%*	$0.25	$58.75	$187.50	$78.50
Total						$5641.25	$18030.25	$2712
Average						$805.90	$2575.75	$387.43
Percentage of fare media sales						21.4%	68.3%	10.3%

*Depending on fare type

Fare Equity Analysis: Because there is a disparate impact and disproportionate burden, mitigation efforts, minimizing fare increases, or not raising fares should be considered.

Because fare increases are reviewed by the Rate Commission and ultimately approved by Council, they will decide if a fare increase is still justifiable. Furthermore, there is also a proposed elimination of the $1.5 million budget cap for the low income fare program to consider. This decision might help low income groups user in the long run as the budget could be increased from the initial budget cap amount, and potentially help delay future low income fare increases because of additional funding for the program.

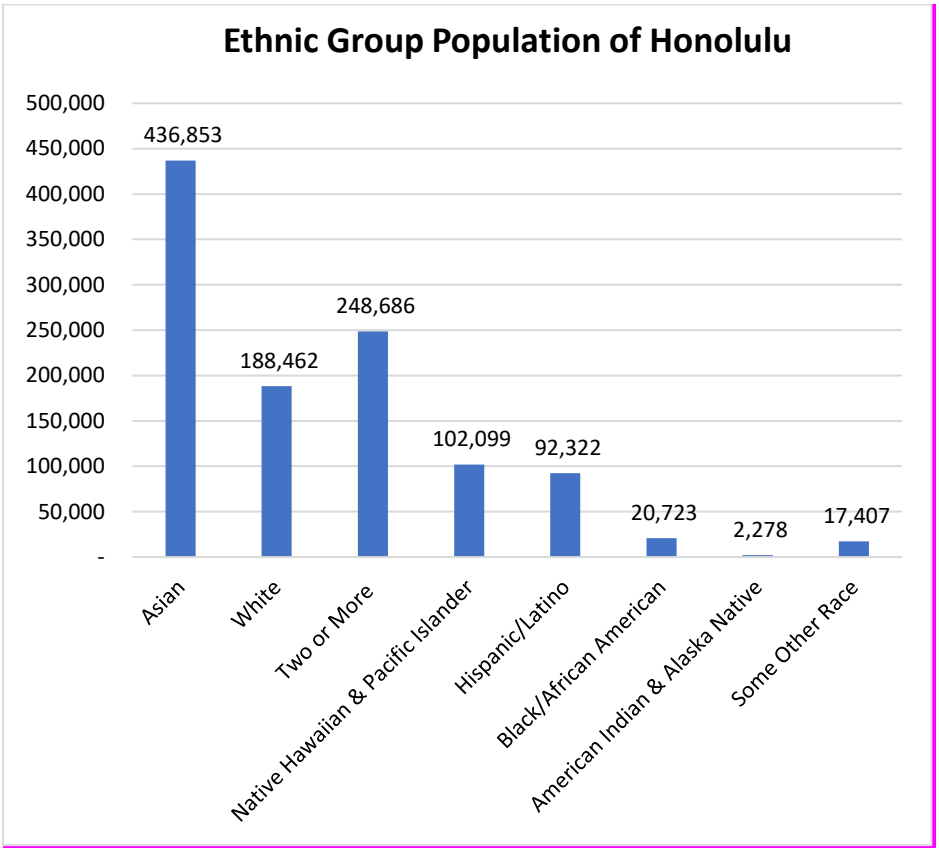
For minority groups, consider that the population of Honolulu are from majority minority groups (see graph 1) and any fare increases will affect minority riders regardless. The on-board survey used for this fare analysis also collected the different ethnic groups that

ride TheBus (see graph 2) and thus confirms that most bus riders reflect the population of Honolulu in correlation.

In Fiscal Year 2024, the total HOLO sales revenue is $37.7 million. Bus cash revenue is $11.5 million, which equates to cash sales to approximately 23% of the total annual bus fare revenues (before costs). With HOLO card transactions being more prevalent, there is a trend of declining cash sales. This would give basis to having a cashless system if the cash collection process proves to be more expensive than accepting cash payments. We see that in Table 3 & 4, overall riders pay with cash more than minority or low income riders. Therefore, there is no disparate impact and disproportionate burden for the cash surcharge. Furthermore, with regards to methods of payments for trips, the same survey also has data that showed that cash payments made up of only 20% of payments made by riders (see graph 3).

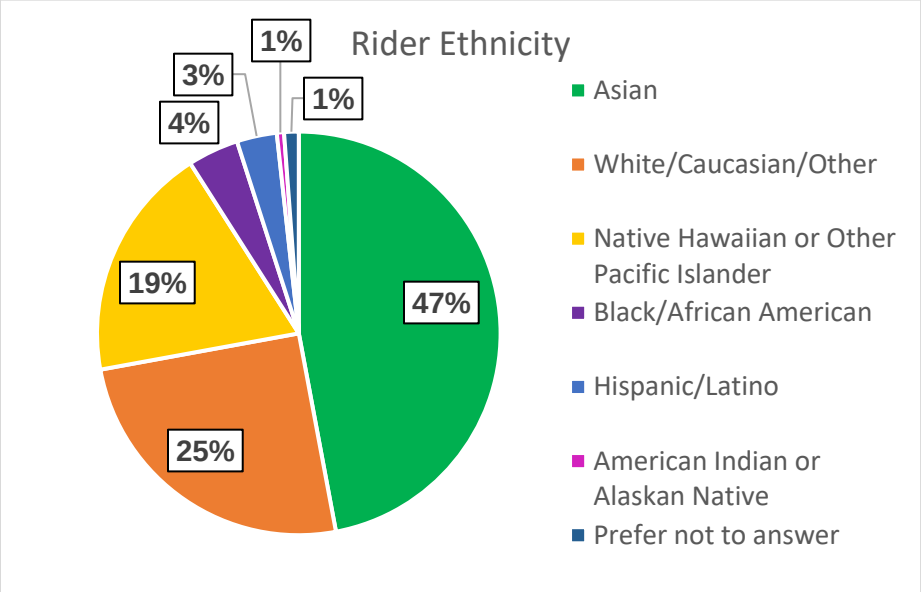
Although charging a cash surcharge may raise equity issues, this is already a ubiquitous concern that affect all transit agencies that have considered removing cash as a payment option. Because the standard HOLO cards require no bank accounts or any other form of documentations before purchase, and that attaining or reloading one is possible through many locations (local residents may reload HOLO cards at local convenient stores and supermarkets) with cash, the impact can be considered low. Paying with cash can be thought of as an extra charge for convenience. However, paying with cash itself may not be convenient considering the added factor of sorting through and attaining the accurate amount of change – riders should pay in exact change for their fares, as no change is conducted on TheBus.

Graph 1:



(Source: United States Census Bureau, 2020 Decennial Census)

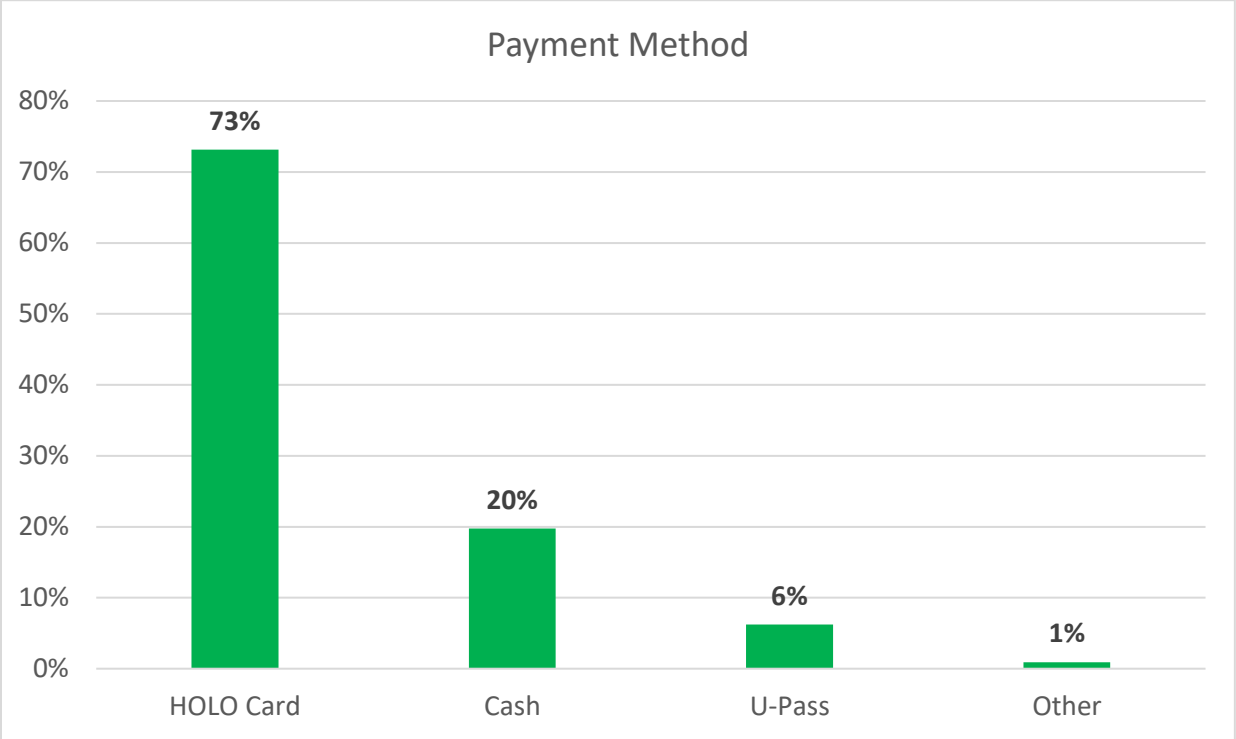
Graph 2:



(Source: Honolulu Transit Comprehensive Operations Analysis Task 1 On-Board Survey, Cambridge Systematics, August, 2021)

Graph 3:

Figure 11(a): Trip Payment, Payment Method



(Source: Honolulu Transit Comprehensive Operations Analysis Task 1 On-Board Survey, Cambridge Systematics, August, 2021) NOTE: U-Pass are passes issued to college students.

End of Attachment 9

CITY COUNCIL
CITY AND COUNTY OF HONOLULU
HONOLULU, HAWAII

CERTIFICATE

RESOLUTION 25-110

Introduced: 04/08/25 By: TOMMY WATERS - BY REQUEST Committee: PLANNING, INFRASTRUCTURE & TRANSPORTATION (PI&T)

Title: APPROVING THE DEPARTMENT OF TRANSPORTATION SERVICES' 2025 PUBLIC TRANSIT TITLE VI PROGRAM PURSUANT TO THE REQUIREMENTS AND GUIDELINES OF THE FEDERAL TRANSIT ADMINISTRATION'S TITLE VI CIRCULAR 4702.1.B.

Voting Legend: * = Aye w/Reservations

04/08/25	INTRO	Introduced.
04/30/25	PI&T	Reported out for adoption. CR-163 4 AYES: CORDERO, DOS SANTOS-TAM, OKIMOTO, WEYER 1 ABSENT: TUPOLA
05/14/25	CCL	Committee report and Resolution were adopted. 9 AYES: CORDERO, DOS SANTOS-TAM, KIA'ĀINA, NISHIMOTO, OKIMOTO, TULBA, TUPOLA, WATERS, WEYER

I hereby certify that the above is a true record of action by the Council of the City and County of Honolulu on this RESOLUTION.

for GLEN I. TAKAHASHI, CITY CLERK

TOMMY WATERS, CHAIR AND PRESIDING OFFICER