



# 2019 Greater Dayton RTA Title VI Analysis Final Report

Prepared for the Greater Dayton Regional Transit  
Authority (RTA)

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### Appendix A: Passenger Listed Starting and Ending Points (Origin & Destination Data)

# 2019 GDRTA TITLE VI ANALYSIS

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## INTRODUCTION

As a recipient of the U.S. Department of Transportation Federal Transit Administration (FTA) funding (49 USC Section 5307 Urbanized Area Formula Program), the Greater Dayton Regional Transit Authority (RTA) must comply with Title VI regulations. The Title VI regulation requirements are included in 49 CFR Section 21.9(b) Title VI Regulations and in the Federal Transit Administration (FTA) Circular 4702.1B (“Circular”) Title VI Requirements and Guidelines for Federal Transit Administration Recipients. The Circular “provide(s) recipients of FTA financial assistance with guidance and instructions necessary to carry out the U.S. Department of Transportation’s (DOT) Title VI regulations and to integrate into their programs and activities considerations expressed in the Department’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons (70 FR 74087, December 14, 2005).”

Title VI compliance prohibits discrimination in any Federally-assisted program on the basis of race, color or national origin.

As part of its annual compliance efforts, RTA contracted with RLS & Associates, Inc. (RLS) to collect and analyze racial, ethnic and income data by surveying a sample of RTA passengers. RLS then compared the results to demographic conditions in the service area and previously conducted Title VI surveys. This report summarizes the results of the recent survey and demographic data analysis efforts completed as part of the RTA Title VI Procedure Update and Service Evaluation. The data contained in this report demonstrates the extent to which members of minority and non-minority groups and low-income individuals benefit from the RTA transportation services.

In addition to passenger surveys, RLS prepared demographic and service profile maps and charts using data from the 2018 American Community Survey (ACS) five-year estimates (2014-2018). This data will assist in determining whether RTA’s service is equally available to minority, low-income and Limited English Proficient (LEP) populations residing within the RTA service area.

This program covers RTA directly operated services. RTA does not does not have any subrecipients.

## RTA RIDER SURVEY METHODOLOGY

Surveyors under the supervision of RLS conducted a rider intercept survey of RTA passengers from October 2019 to December 2019. Each surveyor was trained on the purpose of the survey, Title VI, and the quality of the data being collected. The survey was administered identically throughout the entire RTA service area to ensure equitable sampling.

The goal of the semi-random sampling plan was to ensure that stops and routes were visited at a random time, while obtaining at least 1,000 completed surveys from the RTA stops/routes. At the conclusion of data collection, RLS collected a total of 1,170 surveys.

The majority of the survey time was spent on board buses, and was supplemented by surveys collected at major RTA stops (Wright Stop Plaza). A +/- 20% confidence interval was established for the entire RTA service area. Each route was also given a target quota for each day of week, but that might not have been attained for all of RTA's routes. All of RTA's routes were surveyed every day (weekday, Saturday, and Sunday) and different times of day. The total number of surveys needed in 2019 was projected to be lower than the 2016 survey due to lower RTA ridership. Exhibit 1 lists the total number of surveys collected for each route.

**Exhibit 1: Surveys Collected by Route**

<b>RTA Routes</b>	
<b>Route</b>	<b>Number of Surveys Completed</b>
Route 1	74
Route 2	66
Route 3	2
Route 4	70
Route 5	0
Route 7	102
Route 8	131
Route 9	109
Route 11	17
Route 12	62
Route 14	35
Route 16	92
Route 17	64
Route 18	53
Route 19	53
Route 22	20
Route 23	7
Route 24	39
Route X5	12
Route 34	8
Route 43	1
Flyer	38
Route 64	2
Route 65	2
Route 66	2
Multiple	56
Blanks	57
<b>Total:</b>	<b>1174</b>

## **INTERVIEWER TRAINING AND DATA COLLECTION**

RLS used its employees and independent contractors to assist with the survey collection.

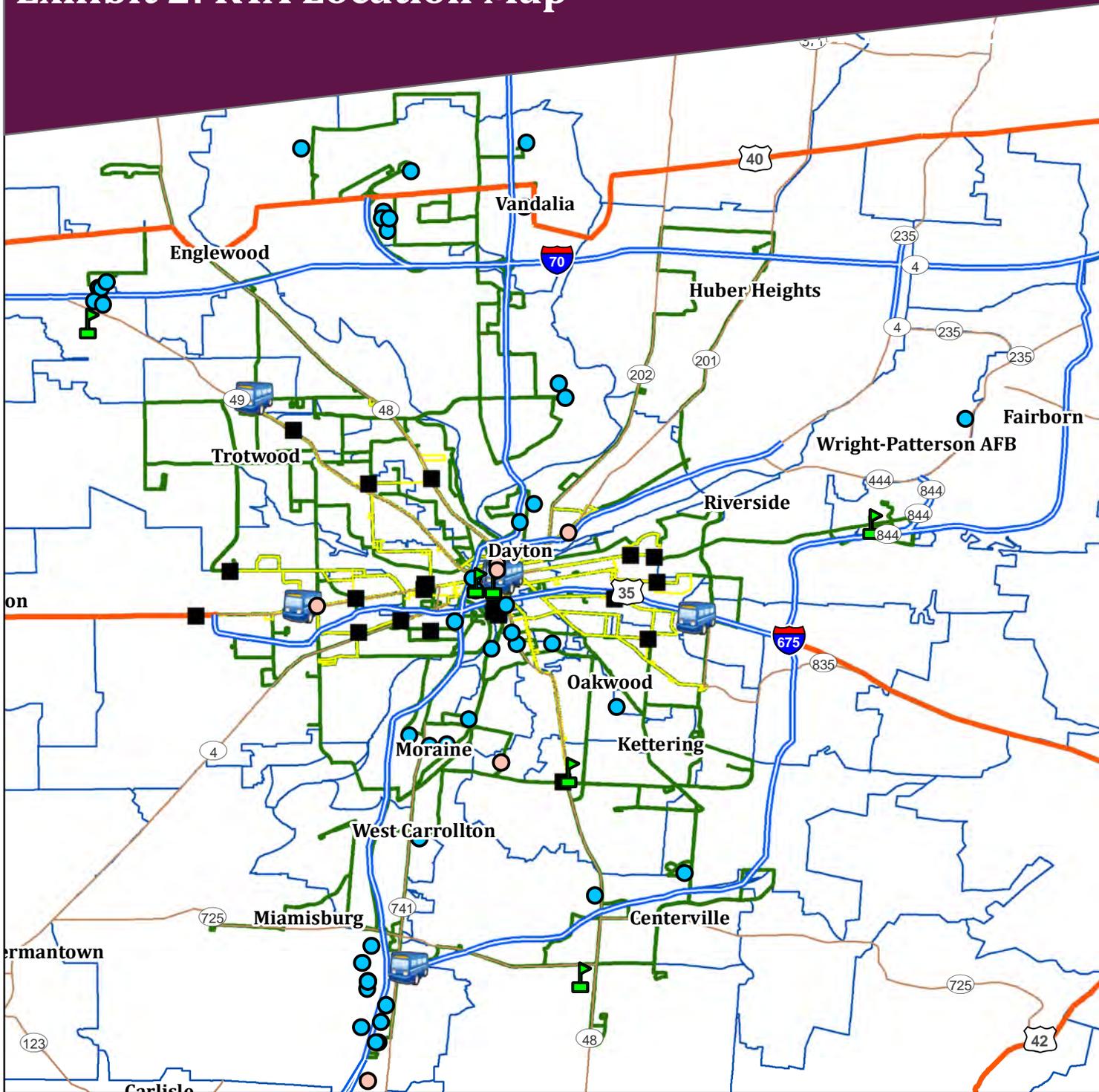
The RLS Project Manager conducted a training session with all surveyors to explain the purpose of the survey, to review it and to address any questions. The training process included a session for the participants to ask one another questions related to the survey instrument in order to expose all interviewers to as many potential respondents' questions as possible.

To conduct the survey, interviewers approached passengers who had boarded a bus, were waiting to board a bus at a bus stop, or those who had just stepped off of an RTA bus. To ensure input from the entire RTA service area, surveyors interviewed passengers on each RTA route. Response rates were high on routes 1, 2, 7, 8, 9, and 16. Response rates were considerably lower on routes 3, 5, 23, 34, 64, 65, and 66 during the times surveyors were onboard the bus.

## **BASELINE**

Exhibit 2 is a location map of Dayton, Ohio with roads, cities, RTA facilities, RTA routes and stops, and major employers. Zip codes are overlaid on the base map because the respondents' zip codes were used to determine the approximate geographic location where he or she lives in the RTA service area.

# Exhibit 2: RTA Location Map



## RTA Title VI Analysis

### Industry

-  Education
-  Employer
-  Healthcare Provider
-  RTA Hubs
-  RTA Facilities (includes substations)
-  Limited Access
-  Highway
-  Major Road
-  Trolley Lines
-  Routes
-  Zip Codes



## **SURVEY INSTRUMENT**

The survey instrument was designed to collect information based on race, color, national origin, income, English proficiency and travel patterns of riders. Questions were based on the Federal Transit Administration (FTA) recommendations in FTA Circular 4702.1B. Information collected included:

- ◆ Demographics of riders (including age, race, national origin, gender, income base, and zip code);
- ◆ English proficiency of non-minority, minority, and low-income riders;
- ◆ Purpose of trips by non-minority, minority, and low-income riders;
- ◆ Frequency of use by non-minority, minority, and low-income riders;
- ◆ Trip originations and destinations of non-minority, minority, and low-income riders;
- ◆ Auto availability by non-minority, minority, and low-income riders;
- ◆ Typical number of transfers by non-minority, minority, and low-income riders;
- ◆ Main mode of transportation for work and non-work trips for non-minority, minority, and low-income riders;
- ◆ Peak hour trip travel times of non-minority, minority, and low-income riders;
- ◆ Total trip cost and method of fare payment by non-minority, minority, and low-income riders; and,
- ◆ Awareness and satisfaction of RTA's services by non-minority, minority, and low-income riders.

The surveys were available in three accessible formats, printed on double-sided cardstock paper with English on one side and Spanish on the opposite side, and were available in large print upon request. Respondents were provided with a pencil and a survey. All riders were asked to complete the survey while waiting to board the bus, while on the bus with the surveyor, or after de-boarding the bus. It was requested that passengers complete only one survey. Surveyors were available to answer questions and/or provide clarification. If a rider was unable to read or understand the information, the surveyor read the questions and wrote the answers accordingly. Each surveyor collected completed surveys from passengers and submitted them to the RLS supervisor at the end of the survey period. The surveys were organized based on the number received from each stop or route and the time day when the respondent submitted the survey. Completed surveys were counted at the end of each shift to ensure an even distribution throughout the service area. The standardized English survey questionnaire is provided as Exhibit 3 and the Spanish formatted survey is provided as Exhibit 4.



**RTA would like to know about you and how you use the bus!**

- What is the route number, your starting point, and your ending point of the bus you will be taking today (nearest intersection or address)?** Route # \_\_\_\_\_  
Starting Street/Cross Street Name: \_\_\_\_\_  
  
Ending Street/Cross Street Name: \_\_\_\_\_
- Typically, how often do you ride an RTA Bus?**  
(a) Few times Monthly (b) Few times Weekly (c) Daily
- Which days do you usually ride the RTA??**  
(a) Daily (b) Monday (c) Tuesday (d) Wednesday (e) Thursday (f) Friday (g) Saturday (h) Sunday
- What is your main purpose in using the bus for this trip? (Please select one)**  
(a) Work (b) School (Middle or High School) (c) Shopping (d) Social Service (e) Social Visit (f) Doctor or Medical Visit (g) College (h) Other \_\_\_\_\_
- About how long will your trip take, including getting to the bus stop, waiting for any transfer bus you may use, riding on the bus, and getting from the bus to your final destination?**  
Minutes: \_\_\_\_\_
- How far did you come to get to the bus stop for this bus?**  
(a) Less than 1 Block (b) 1-2 Blocks (c) 3-4 Blocks (d) 5-6 Blocks (e) More Than 6 Blocks
- How many separate buses do you have to use to make this one-way trip to where you are going now?**  
(a) 1 Bus (b) 2 Buses (c) 3 or More
- What time of day did you begin this trip?**  
(a) 4:00-6:30AM (b) 6:30-9:00AM (c) 9:00-11:00AM (d) 11:00AM-1:00PM (e) 1:00-3:00PM (f) 3:00-5:00PM (g) 5:00-6:30PM (h) 6:30-10:00PM (i) 10:00PM-2:00AM

- How will you pay your fare on this bus today?**  
(a) Cash (b) 31-Day Pass (c) 7-Day Pass (d) Day Pass (e) Reduced Day pass (f) Reduced 31-Day Pass (g) Red/Gray Pass
- Where did you purchase your pass?**  
(a) Bus (b) Ticket Vending Machine (c) Wright Stop Plaza Outlet (d) Other retail location
- Would you be comfortable using a reloadable fare card to pay your fare?**  
(a) Yes (b) No
- Besides your current trip will you go to any other destinations today using an RTA bus?**  
(a) No (b) 1 Other (c) 2 Other (d) 3 or More Destinations
- Which applies to you, are you presently?**  
(a) Employed for pay outside your home (b) Employed for pay in your home (c) Student (d) Homemaker (e) Retired (f) Unemployed (g) Other: \_\_\_\_\_
- How many automobiles are in your household?**  
(a) 0 (b) 1 (c) 2 (d) 3 or More
- How many licensed drivers are in your household?**  
(a) 0 (b) 1 (c) 2 (d) 3 or More
- Which is your main mode of transportation for work and non-work trips?**  

<b><u>Work (Select One)</u></b>		<b><u>Non-work (Select One)</u></b>	
(a) Drive Alone	(b) Carpool	(a) Drive Alone	(b) Carpool
(c) RTA	(d) Bicycle	(c) RTA	(d) Bicycle
(e) Walk	(f) Do not Commute	(e) Walk	(f) Do not Commute
- How old are you?** \_\_\_\_\_ Years old
- What is the zip code at your home?** Zip: \_\_\_\_\_
- Gender?** (a) Female (b) Male (c) Transgender (d) Other (e) Prefer not to disclose
- How many people (adults and children) live in your house?**  
(a) 1 (b) 2 (c) 3 (d) 4 (e) 5 (f) 6 (g) 7 or more

- What is your household's annual income?**  
(a) Less than \$15,000 (b) \$15,000-\$24,999 (c) \$25,000-\$34,999 (d) \$35,000-\$74,999 (e) \$75,000-\$99,999 (f) \$100,000-\$149,999 (g) \$150,000-\$199,999 (h) More than \$200,000
- Do you consider yourself: (If more than one group applies to you, please circle all that apply.)**  
(a) White (b) African American/Black (c) Hispanic (d) Asian (e) Native American Indian (f) Multiple Race (g) Other: \_\_\_\_\_
- In which Country were you born (i.e., USA, China)?** \_\_\_\_\_
- Do you speak or understand English?**  
(a) Very Well (b) Not Well (c) Not At All

**How do you rate RTA service?** ↻ Needs Improvement → Very Good ↻

25.Frequency of service	1	2	3	4	5
26.Cleanliness of the buses	1	2	3	4	5
27.Connections between buses	1	2	3	4	5
28.Safety and security at stops	1	2	3	4	5
29.Safety and security on bus	1	2	3	4	5
30.Buses running on time	1	2	3	4	5
31.Time service ends in evening	1	2	3	4	5
32.Distance to stop from home	1	2	3	4	5
33.Shelters at stops	1	2	3	4	5
34.The price to ride	1	2	3	4	5
35.Convenience of schedules	1	2	3	4	5
36.Driving skills of bus operator	1	2	3	4	5
37.Helpfulness of drivers	1	2	3	4	5
38.Helpfulness of phone staff	1	2	3	4	5
39.Helpfulness of Ambassadors	1	2	3	4	5
40.Bus routes go where needed	1	2	3	4	5
41.Overall RTA service	1	2	3	4	5

- Do you have cell phone access?** (a) Yes (b) No
- Do you use any of these smartphone apps or services?**  
(a) No, I don't use any (b) Google Maps (c) Transit App (d) Moovit (e) Real time text messaging



**¡A RTA le gustaría saber sobre usted y cómo usa el autobús!**

- ¿Cuál es el número de ruta, su punto de partida y su punto final del autobús que tomará hoy (intersección o dirección más cercana)? Ruta # \_\_\_\_\_  
Calle de inicio/Nombre de calle que cruza: \_\_\_\_\_  
Calle final/Nombre de calle que cruza: \_\_\_\_\_
- Por lo general, ¿con qué frecuencia viaja en un autobús RTA?  
(a) Pocas veces al mes (b) Pocas veces por semana (c) Diario
- ¿Qué días sueles viajar en el RTA?  
(a) Diario (b) Lunes (c) Martes (d) Miércoles (e) Jueves (f) Viernes (g) Sábado (h) Domingo
- ¿Cuál es su propósito principal al usar el autobús para este viaje? (Por favor, seleccione uno)  
(a) Trabajo (b) Escuela (secundaria o preparatoria) (c) Compras (d) Servicio Social (e) Visita Social (f) Doctor o Visita Médica (g) Colegio (h) Otro \_\_\_\_\_
- ¿Aproximadamente cuánto tiempo tomará su viaje, incluyendo llegar a la parada del autobús, esperar cualquier autobús de transferencia que pueda usar, viajar en el autobús y llegar del autobús a su destino final? Minutos: \_\_\_\_\_
- ¿Qué tan lejos viajaste para llegar a la parada de este autobús?  
(a) Menos de una cuadra (b) 1-2 cuadras (c) 3-4 cuadras (d) 5-6 cuadras (e) Más de 6 cuadras
- ¿Cuántos autobuses separados tienes que usar para hacer este viaje de ida a donde vas ahora?  
(a) 1 autobús (b) 2 autobuses (c) 3 o más
- ¿A qué hora del día comenzaste este viaje?  
(a) 4:00-6:30AM (b) 6:30-9:00AM (c) 9:00-11:00AM (d) 11:00AM-1:00PM (e) 1:00-3:00PM (f) 3:00-5:00PM (g) 5:00-6:30PM (h) 6:30-10:00PM (i) 10:00PM-2:00AM

- ¿Cómo pagará su tarifa en este autobús hoy?  
(a) Efectivo (b) Pase de 31-Días (c) Pase de 7-Días (d) Pase de Día (e) Pase de Día Reducido (f) 31-Días Reducido (g) Pase Rojo/Gris
- ¿Dónde compraste tu pase?  
(a) Autobús (b) Máquina expendedora de boletos (c) Wright Stop Plaza Outlet (d) Otro punto de venta
- ¿Se sentiría cómodo usando una tarjeta de tarifa recargable para pagar su tarifa?  
(a) Si (b) No
- Además de su viaje actual, ¿irá a otros destinos hoy usando un autobús RTA?  
(a) No (b) Uno más (c) Dos más (d) 3 o más destinos
- Que aplica a usted, ¿está usted actualmente?  
(a) Empleado por paga fuera de su hogar (b) Empleado por paga en su hogar (c) Estudiante (d) Amo/a de casa (e) Jubilado/a (f) Desempleado/a (g) Otro: \_\_\_\_\_
- ¿Cuántos automóviles hay en su hogar?  
(a) 0 (b) 1 (c) 2 (d) 3 o más
- ¿Cuántos conductores con licencia hay en su hogar?  
(a) 0 (b) 1 (c) 2 (d) 3 o más
- ¿Cuál es su principal medio de transporte para viajes laborales y no laborales?  
**Laborales (Seleccione uno)** (a) Viaja solo/a (b) RTA (c) Comparte viaje (d) Bicicleta (e) Camina  
**No Laborales (Seleccione uno)** (a) Viaja solo/a (b) RTA (c) Comparte viaje (d) Bicicleta (e) Camina (f) No viaja
- ¿Cuántos años tienes? \_\_\_\_\_ Años
- ¿Cuál es el código postal en su casa? Código: \_\_\_\_\_
- ¿Género? (a) Femenino (b) Masculino (c) Transgénero (d) Otro (e) Prefiero no revelar
- ¿Cuántas personas (adultos y niños) viven en su casa?  
(a) 1 (b) 2 (c) 3 (d) 4 (e) 5 (f) 6 (g) 7 o más

- ¿Cuál es el ingreso anual de su hogar?  
(a) Menos de \$15,000 (b) \$15,000 - \$24,999 (c) \$25,000 - \$34,999 (d) \$35,000 - \$74,999 (e) \$75,000 - \$99,999 (f) \$100,000 - \$149,999 (g) \$150,000 - \$199,999 (h) Más de \$200,000
- ¿Se considera usted mismo? (Si se le aplica más de un grupo, marque todos los que correspondan)  
(a) Blanco (b) Afroamericano/Negro (c) Hispano (d) Asiático (e) Indio Nativo Americano (f) Raza múltiple (g) Otro: \_\_\_\_\_
- ¿En qué país nació (es decir, EE. UU., China)? \_\_\_\_\_
- ¿Hablas o entiendes inglés?  
(a) Muy bien (b) No muy bien (c) En absoluto

**¿Cómo califica el servicio RTA?** ↻ Necesita Mejorar **Muy Bien** ↻

25. Frecuencia de servicio	1	2	3	4	5
26. Limpieza de los autobuses	1	2	3	4	5
27. Conexiones entre autobuses	1	2	3	4	5
28. Seguridad en las paradas	1	2	3	4	5
29. Seguridad en el autobús	1	2	3	4	5
30. Autobuses viajan a tiempo	1	2	3	4	5
31. Servicio termina en la noche	1	2	3	4	5
32. Distancia a parada de casa	1	2	3	4	5
33. Refugios en paradas	1	2	3	4	5
34. El precio para viajar	1	2	3	4	5
35. Conveniencia de horarios	1	2	3	4	5
36. Cómo maneja el conductor	1	2	3	4	5
37. Lo servicial de los conductores	1	2	3	4	5
38. Lo servicial por telefono	1	2	3	4	5
39. Lo servicial de embajadores	1	2	3	4	5
40. A donde van rutas de autobús	1	2	3	4	5
41. Servicio general de RTA	1	2	3	4	5

- ¿Tiene acceso a teléfono celular? (a) Si (b) No
- ¿Usas estas aplicaciones o servicios para teléfonos inteligentes?  
(a) No, no uso ninguno (b) Google Maps (c) Aplicación de Transito (d) Moovit (e) Mensajes de texto en tiempo real

Surveys were coded by the bus stop or route where they were collected and the results were entered into a database for analysis. Survey responses were analyzed on the basis of the respondent's race, income level, home zip code, as well as the origin and destination of each trip.

## **RTA TRANSIT PROFILE**

The RTA system encompasses a large geographic area which includes Montgomery County and a few surrounding areas in Greene County (Wright Patterson Air Force Base, Beavercreek, and Fairborn). As indicated previously in this report, the results of the RTA Title VI Analysis will demonstrate the extent and availability of RTA service to minority, non-minority, low-income, and Limited English Proficient (LEP) populations residing within the service area. The following sections provide a description of the results and findings.

The first section includes a description of the overall characteristics of RTA passengers. This description includes predominant demographic characteristics, trip making, and travel patterns. The information gathered from the survey is compared to the 2018 American Community Survey (ACS) Five-Year Estimates for Montgomery County. Comparisons of survey data with the information found in the census data are a test of the confidence level of the survey results. The analysis concludes with a comparison of the quality of service by minority and non-minority survey respondents.

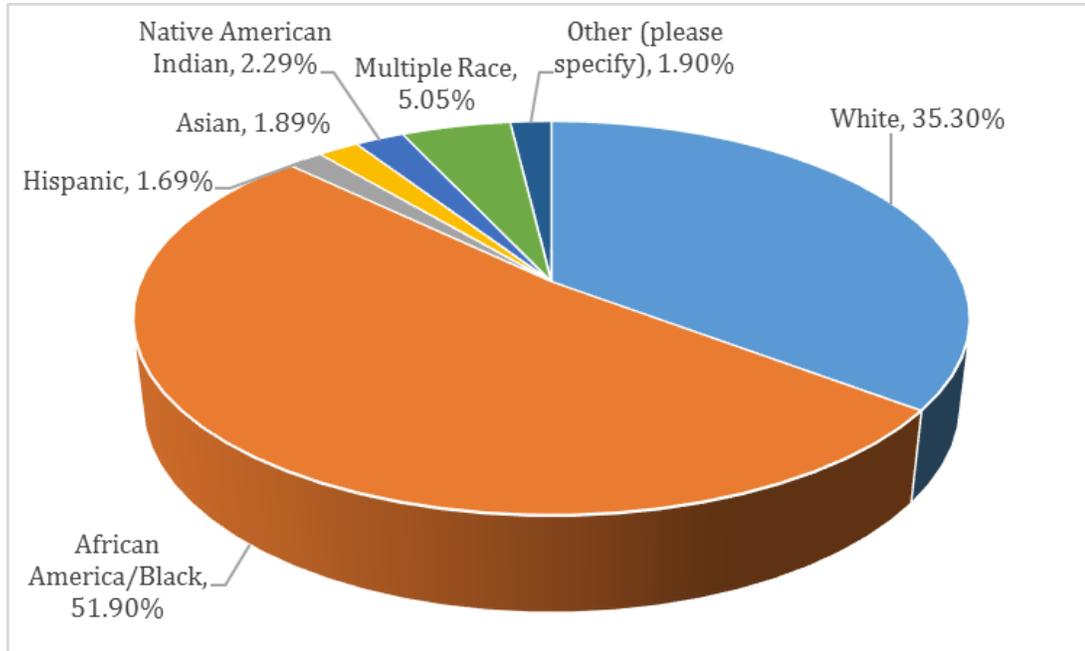
### **Race**

As shown in Exhibit 5, approximately 65 percent of RTA riders who participated in the survey are minorities, and 35 percent are considered to be non-minority. African Americans make up the largest portion of the minority survey respondents (51.90 percent). Multiple races make up the next highest percentage of minority respondents, at 5.05 percent.

When comparing these results to the Title VI survey conducted in 2016, the race distribution of RTA riders is nearly identical. There were slightly more "other" and "Asian" respondents and slightly fewer "Multiple Race" and "White alone" respondents in 2019 as compared to 2016.

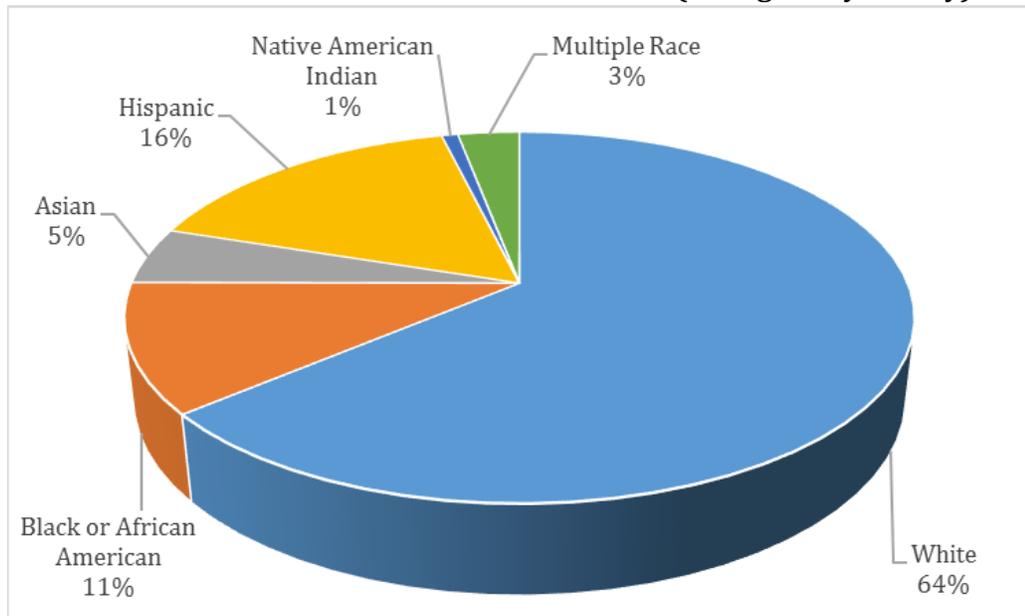
When compared to the population of Montgomery County, RTA passengers' race distribution has notable differences from the survey sample. According to the 2018 ACS Five-Year Estimates for Montgomery County, the population of Montgomery County is 532,331 persons. The population is 72 percent non-minority and 28 percent minority. Black or African Americans make up the largest portion of the minority population at approximately 13 percent. The balance of the minority population is relatively equal between Asians, Hispanics, and those describing themselves as Multi-racial. Exhibit 6 depicts the race distribution of Montgomery County.

**Exhibit 5: Race Distribution of Survey Respondents**



Source: RLS & Associates, Inc. Surveys: October – December 2019

**Exhibit 6: Race Distribution of RTA's Service Area (Montgomery County)**



Source: 2018 American Community Survey (ACS) Five-Year Estimates

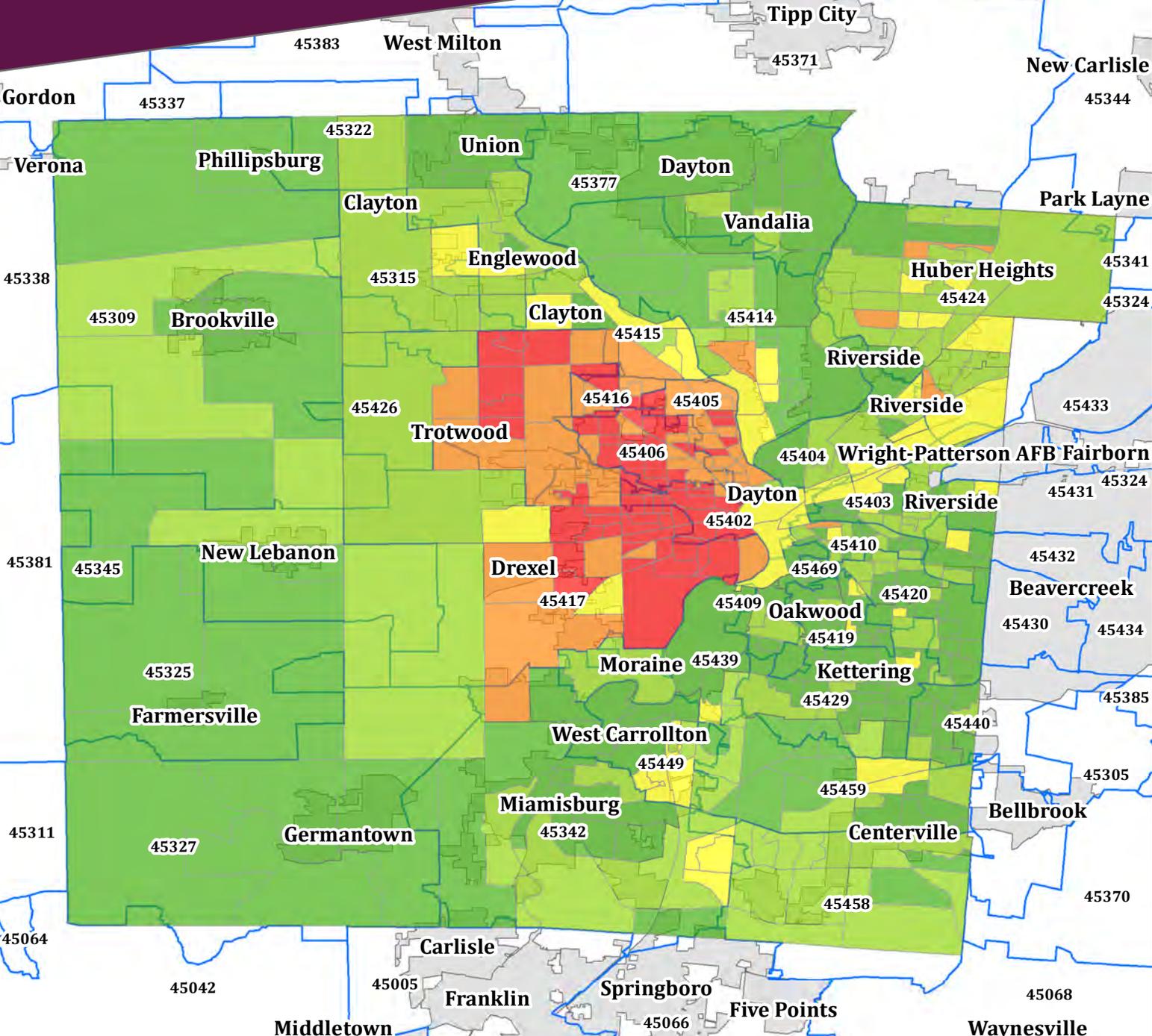
To provide a second layer of demographic analysis, the entire service area was analyzed at the census block group level to determine population percentage by race. Exhibits 7 and 8 illustrate the percent of minority and non-minority individuals in each Montgomery County census tract. Zip code boundaries overlaid on the census block groups helps to visualize the locations of minority and non-

minority populations. As depicted in Exhibit 7, the highest concentrations of minority individuals reside in the 45417, 45402, 45426, 45405, 45416, and 45406 zip codes. These zip codes are located to the west and northwest of the downtown Dayton census block groups in the cities of Dayton and Trotwood. Block groups with 87 percent or more minority residents are located around US Hwy 35, south of Salem Avenue and west of Interstate 75. The census blocks with the highest percentage of non-minority residents (more than 89 percent) are located around the cities of Brookville, New Lebanon, Farmersville, Germantown, Miamisburg, Phillipsburg, Oakwood, Englewood, Kettering, Centerville, and Vandalia as depicted in Exhibit 8.

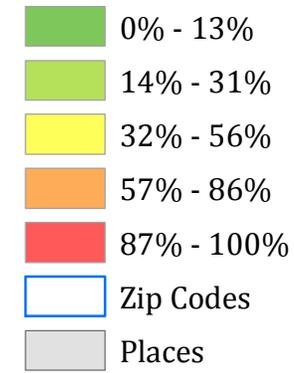
Exhibits 9 and 10 illustrate the distribution of respondents by the predominant race of his or her zip code of residence. The majority of minority survey respondents lived in the same zip codes as those depicted in Exhibit 7, Minority Population by block group. The zip codes with the highest number of minority respondents were located in the western section of the Dayton metro area (45417, 45406, 45405, and 45402). The highest concentration of non-minority survey respondents was within the 45402 and 45310 zip codes. The 45406, 45417, 45420, 45404, 45403, and 45424 zip codes had between 14 and 23 survey responses.

# Exhibit 7: Percentage Minority by Block Groups

## Greater Dayton RTA Title VI Analysis



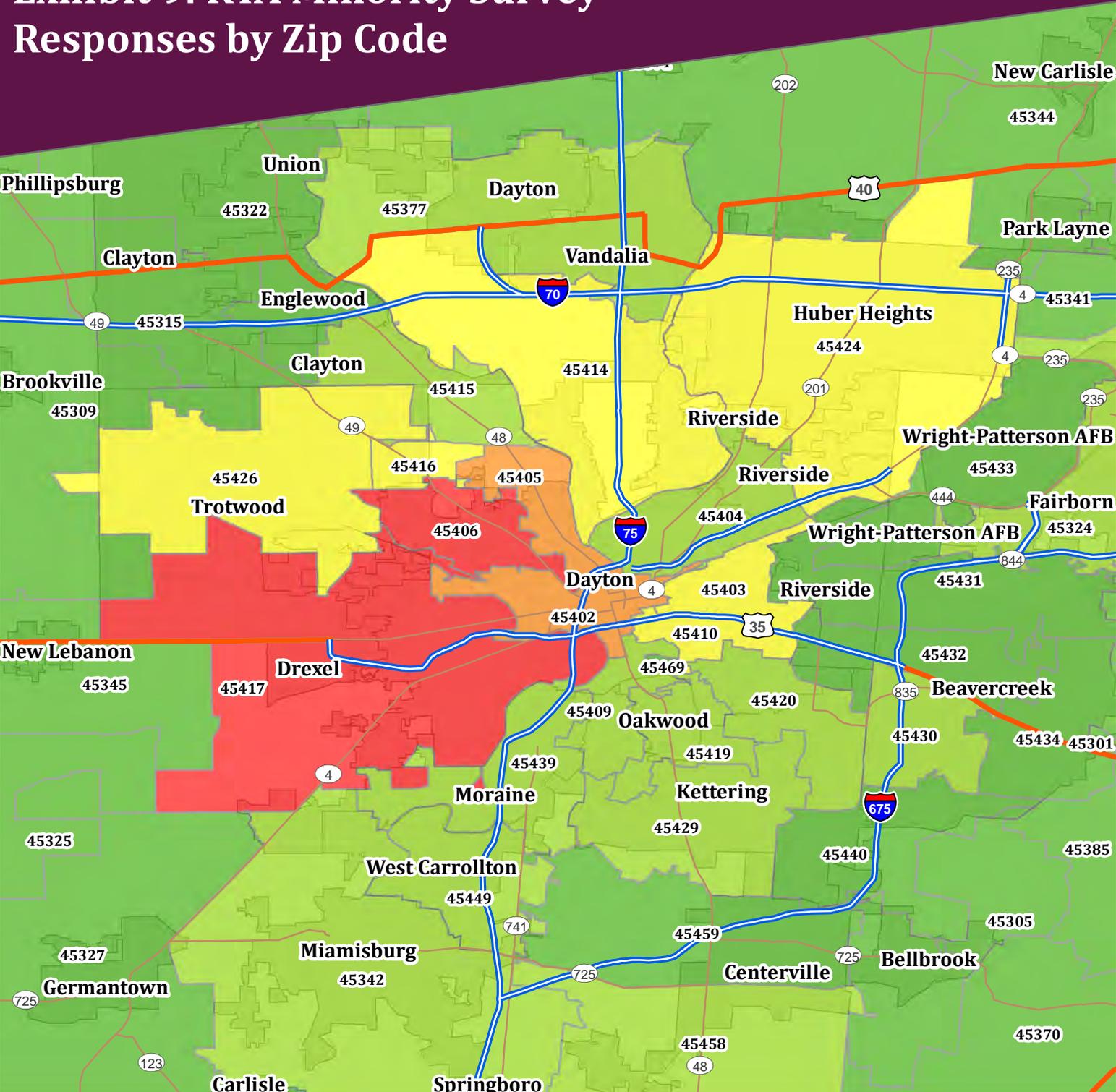
### Percent Minority





# Exhibit 9: RTA Minority Survey Responses by Zip Code

## Greater Dayton RTA Title VI Analysis



- Limited Access
- Highway
- Major Road

- Minority Responses**
- 0 - 3
  - 4 - 13
  - 14 - 32
  - 33 - 63
  - 64 - 99
  - Places



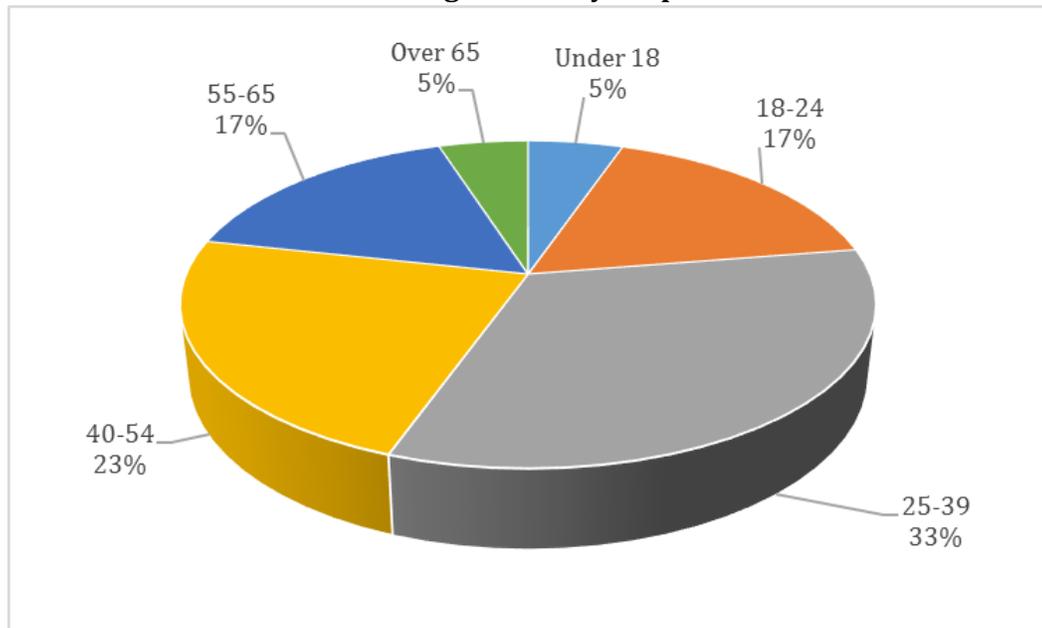


## Age

Exhibit 11 depicts the age groups of RTA passengers that were included in the survey sample. Over 33 percent of passengers reported their age to be between 25 and 39 years. The second largest age group is the 40 to 54 year olds, who make up approximately 23 percent of the total survey respondents. The smallest age groups of riders who reported an age were those under 18 and over 65; making up about five (5) percent of the total passengers surveyed, respectively.

When comparing these results to the Title VI survey conducted in 2016, the age groups of RTA riders are similar. In 2019 there were slightly more survey respondents who were age 25-39 (33 percent) as compared to 2016 (29 percent).

**Exhibit 11: Age of Survey Respondents**

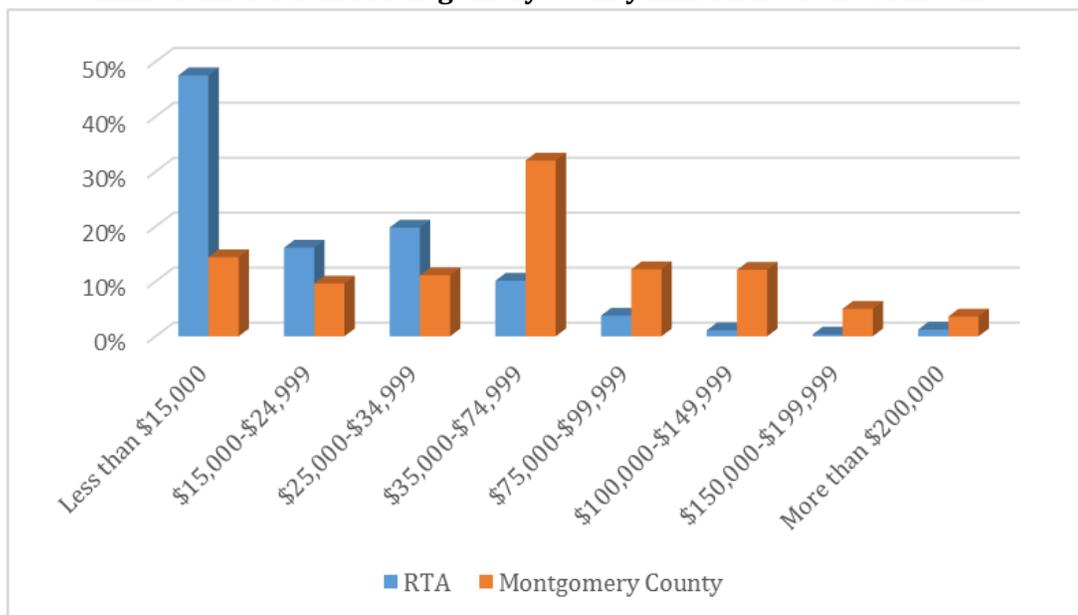


Source: RLS & Associates, Inc. Surveys: October – December 2019

## Household Income

As part of the survey, RTA passengers were asked to provide their household income. Household income is the combined total income for all individuals living in the household. The survey responses were compared to the 2018 ACS Five-Year Estimates for Montgomery County. The greatest number of RTA passengers reported a yearly household income of less than \$15,000. This overwhelming segment of passengers accounted for 39 percent of the total survey respondents. According to the 2018 ACS Five-Year Estimates for Montgomery County, the median annual household income for Montgomery county residents is \$50,838. Just more than five (5) percent of RTA passengers reported earning more than \$75,000 per year, compared to 32.9 percent for the Montgomery County population reporting the same. Exhibit 12 compares the RTA survey respondents' annual household income and the 2018 ACS Five-Year Estimates for Montgomery County.

**Exhibit 12: RTA and Montgomery County Annual Household Income**

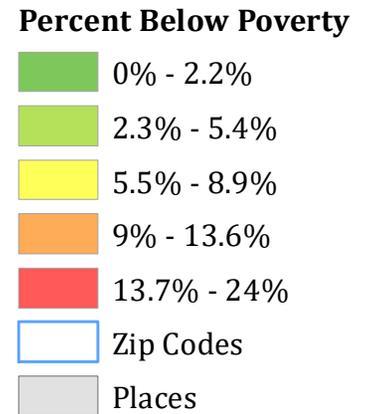
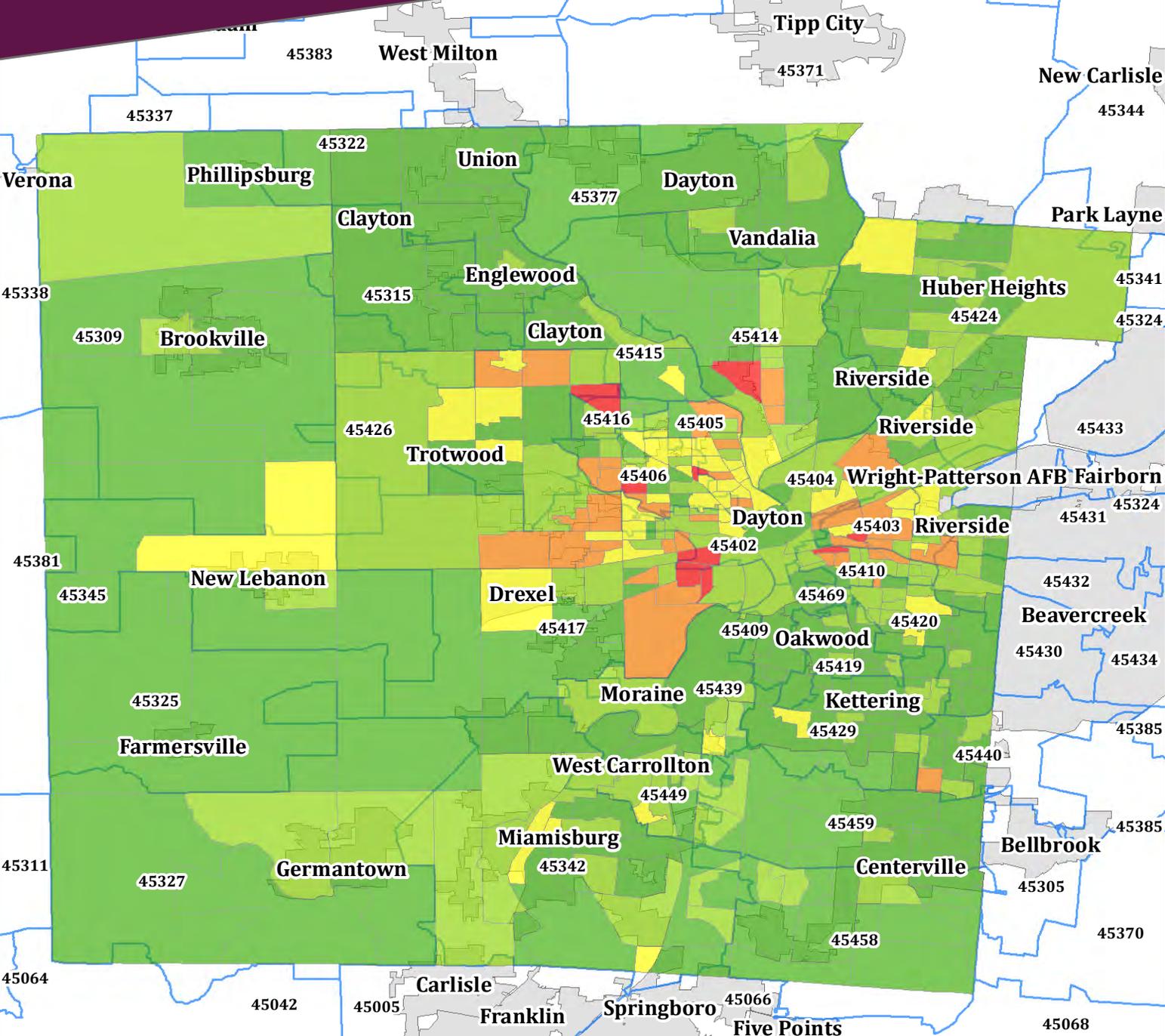


Source: RLS & Associates, Inc. Surveys: October - December 2019  
 Source: 2018 American Community Survey (ACS) Five-Year Estimates

Exhibit 13 provides a visual representation of locations within the RTA service area of household incomes below the poverty level. The area was analyzed using 2018 ACS Five-Year Estimates for Montgomery County at the census block group level. The block groups that are colored in red and portion of those colored in orange have poverty levels above the State of Ohio’s average household poverty level (13.7 percent). The census block groups with the highest concentration of poverty levels are located in and directly around the City of Dayton.

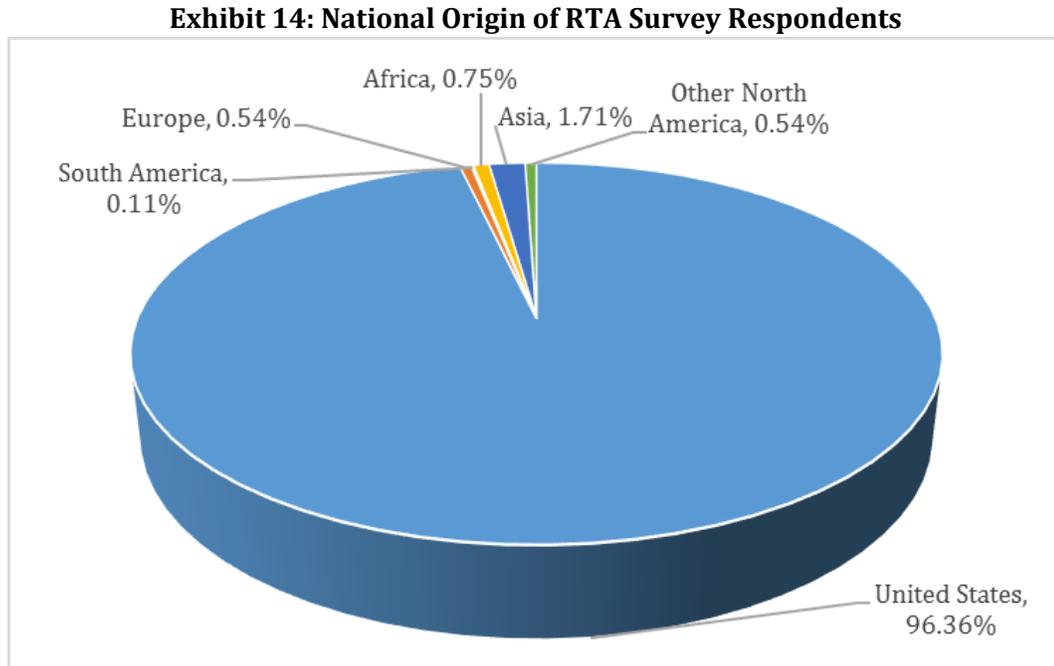
# Exhibit 13: Percent of Households Below Poverty by Block Groups

## Greater Dayton RTA Title VI Analysis



## **National Origin**

RTA passengers were asked to indicate their place of birth for the purpose of measuring nation of origin. The majority of respondents, 96.36 percent, reported a national origin of the United States. Other responses included a national origin of a country in North America (other than the United States), Asia, Africa, South America or Europe. Only 3.65 percent of RTA survey respondents constituted the non-United States origin groups. Exhibit 14 depicts the national origin of survey respondents.

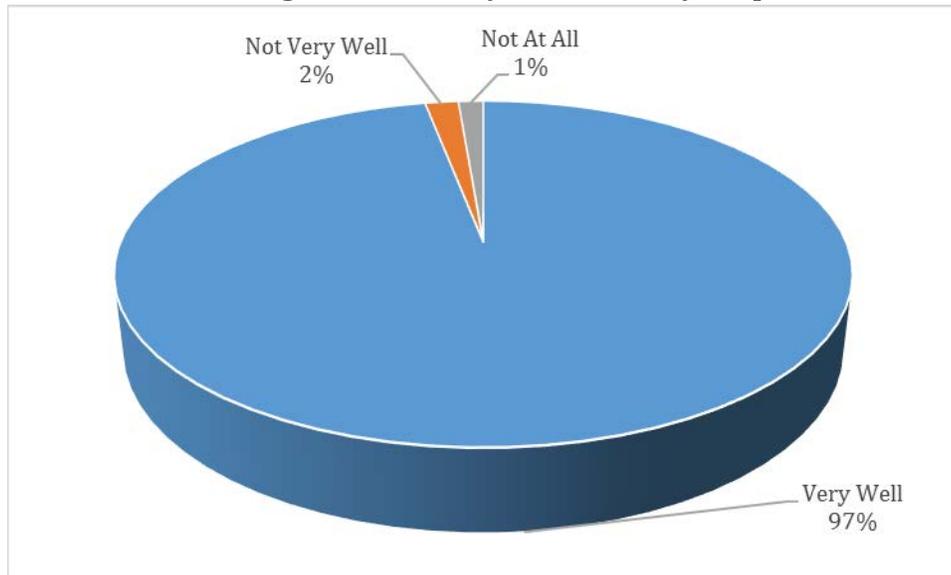


Source: RLS & Associates, Inc. Surveys: October – December 2019

## **Limited English Proficiency (LEP)**

RTA passengers were asked to provide information about their English proficiency. Surveyors had copies of the survey in an accessible format for individuals who could not answer in English but could answer in Spanish. Nearly all of the respondents indicated they speak English very well. Three (3) percent of respondents reported speaking English “not well” or “not at all.” Exhibit 15 depicts the percentage of LEP passengers.

### Exhibit 15: English Proficiency of RTA Survey Respondents



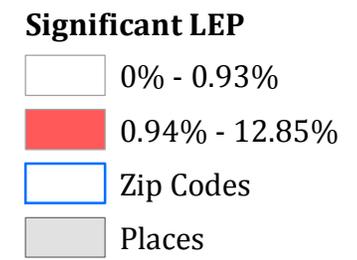
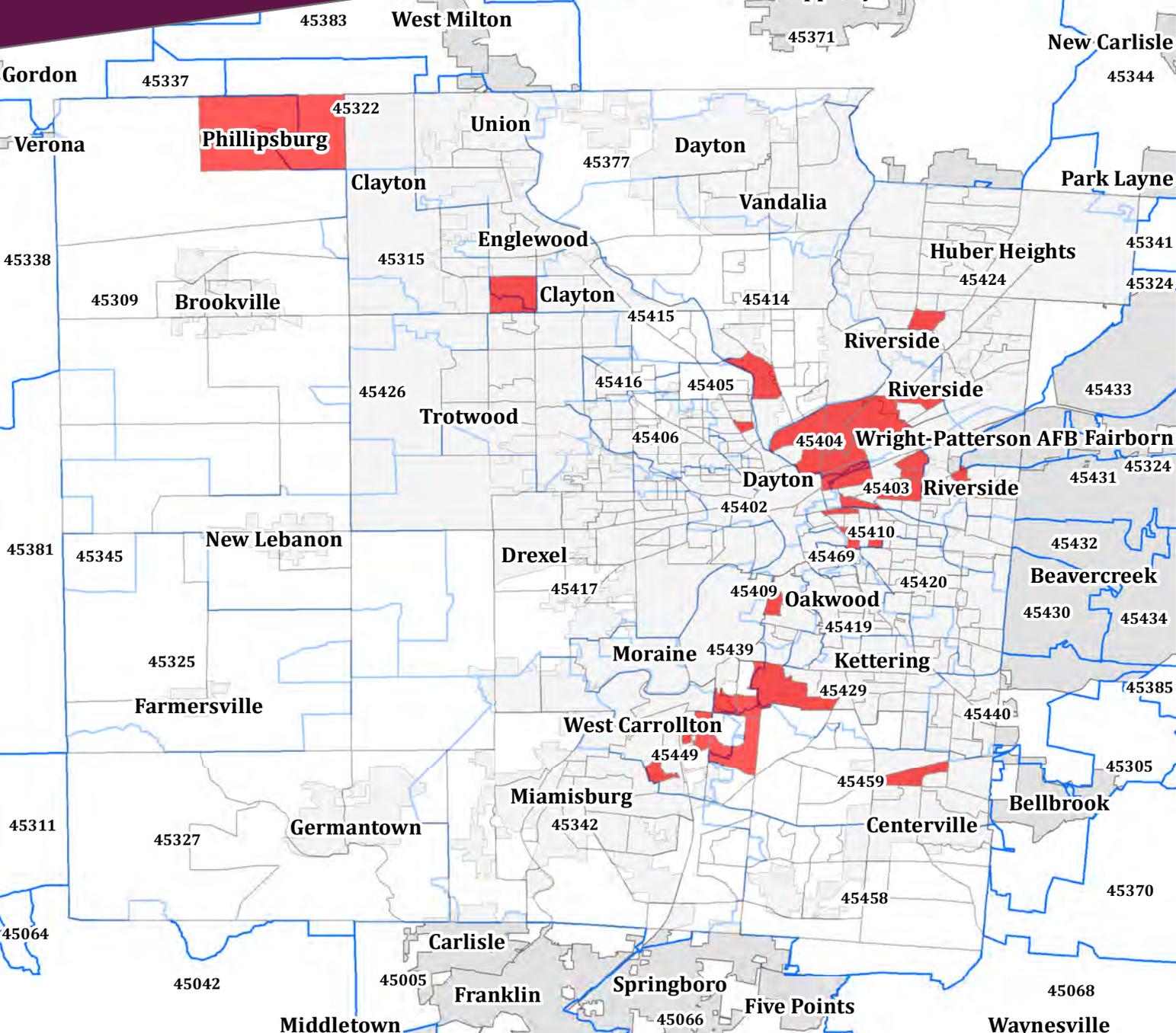
Source: RLS & Associates, Inc. Surveys: October – December 2019

The entire service area was analyzed at the census block group level to determine population densities by Limited English Proficiency (LEP). To provide a second layer of demographic analysis, Exhibit 16 illustrates the block groups located in the RTA service area that have percentage LEP residents higher than the Montgomery County average (0.93 percent). Zip code boundaries, obtained using the 2018 U.S. Census ACS Five-Year Estimates, were overlaid on the census block groups to help visualize the locations of LEP populations. According to the data there are 27 block groups that have LEP population percentages above the county average of 0.93 percent. These block groups are generally located around northeast Dayton, Phillipsburg, Clayton, West Carrollton, and Riverside.

Exhibit 17 illustrates distribution of survey respondents by zip code who indicated having Limited English Proficiency. The zip codes with the highest number of reported LEP passengers are 45417 and 45410. This is similar to 2016 when just the 45417 zip code had the highest amount of LEP responses. The second highest LEP zip code, 45402, is located in downtown Dayton. Other zip codes that reported LEP residents are 45403, 45406, 45414, 45415, 45424, and 45439.

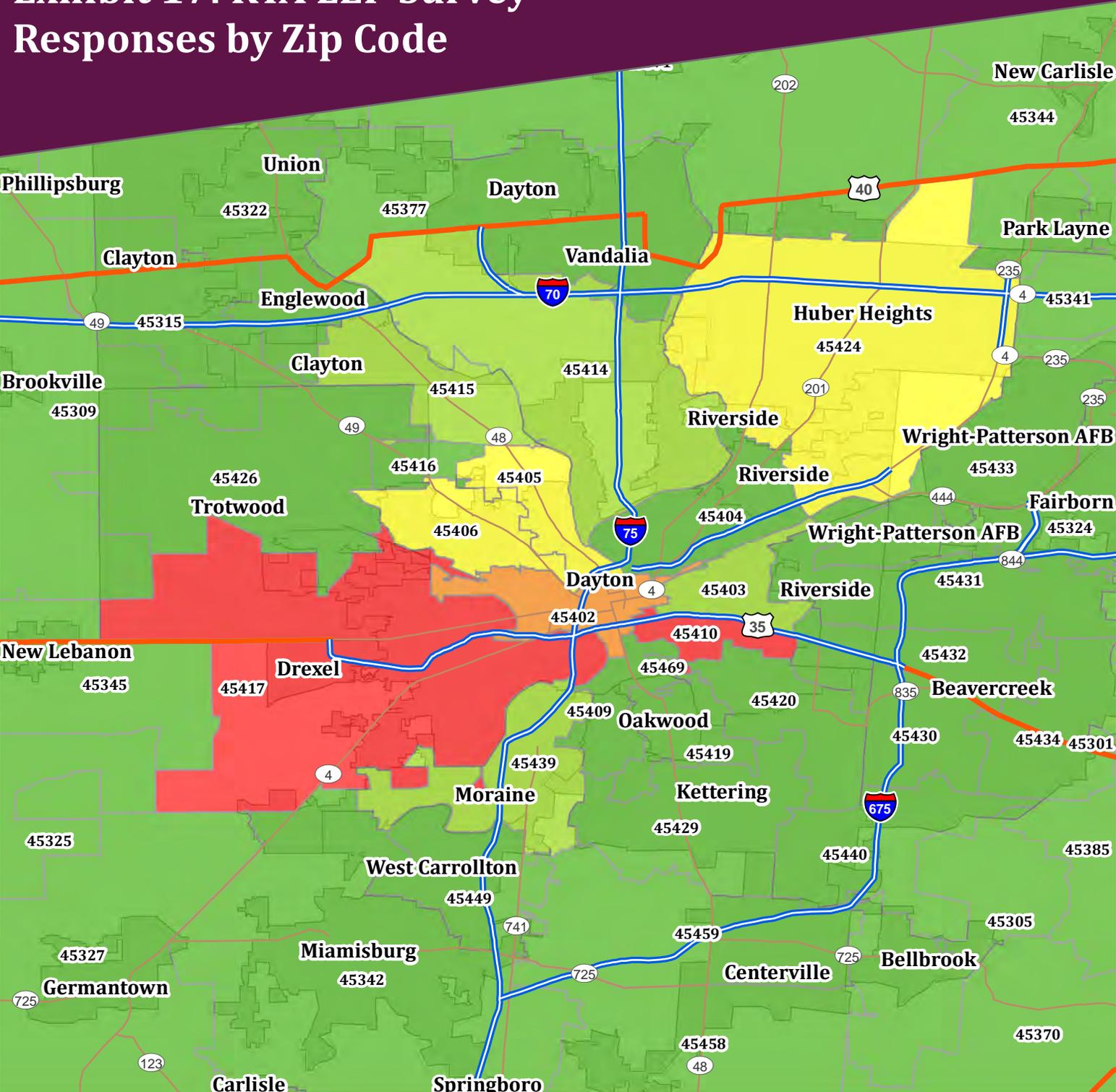
# Exhibit 16: Significant LEP Population by Block Groups

## Greater Dayton RTA Title VI Analysis



# Exhibit 17: RTA LEP Survey Responses by Zip Code

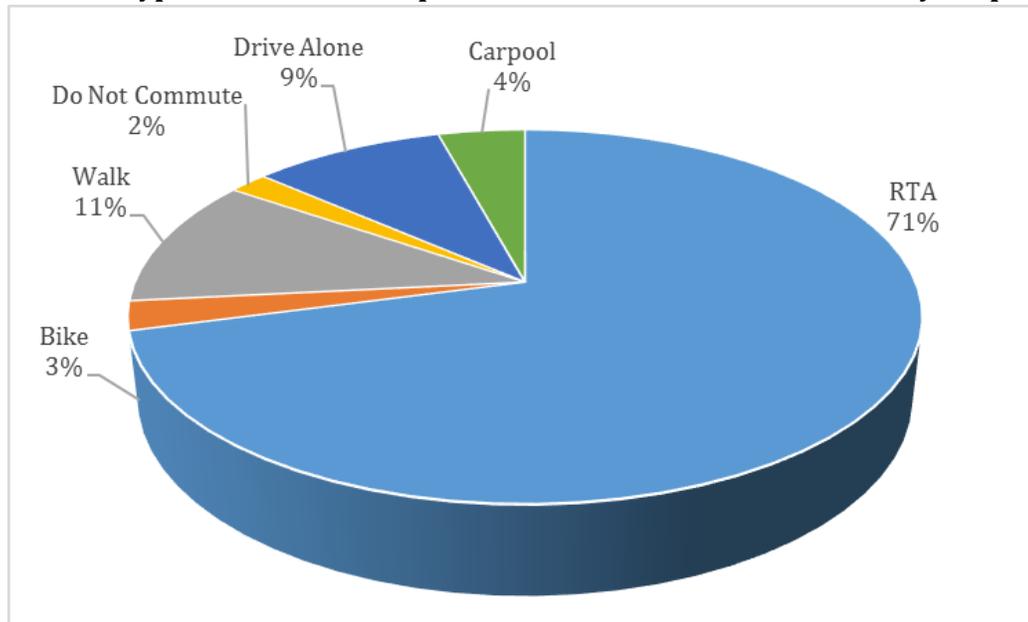
## Greater Dayton RTA Title VI Analysis



## **Mode of Transportation**

Passengers were asked about their typical mode of transportation to and from work. The vast majority of RTA survey respondents (71 percent), use RTA as their main mode of transportation to and from work. Nine (9) percent of respondents typically drive alone. A combined 17 percent of respondents reported walking to and from work, carpooling, or indicated that they do not commute. Three (3) percent of respondents commuted to work using a bicycle as their main mode of transportation. Exhibit 18 depicts the mode of transportation that respondents typically use to get to and from work.

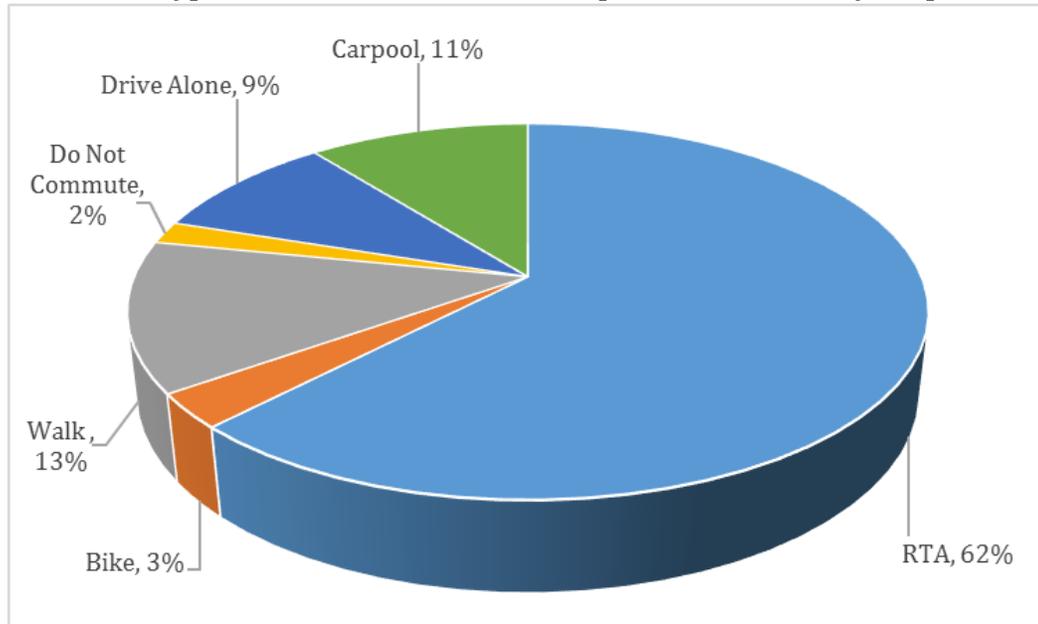
**Exhibit 18: Typical Mode of Transportation to and from Work for Survey Respondents**



Source: RLS & Associates, Inc. Surveys: October – December 2019

Passengers were also asked what their main mode of transportation was for all non-work related needs. Exhibit 19 displays the percentages of modes of travel for all non-work related needs. At 62 percent, the largest percentage of people surveyed use RTA for all non-work related transportation. The second highest percentage, at 13 percent, included people who walk. The smallest group was the two (2) percent who do not commute for non-work activities.

### Exhibit 19: Typical Non-Work Mode of Transportation for Survey Respondents



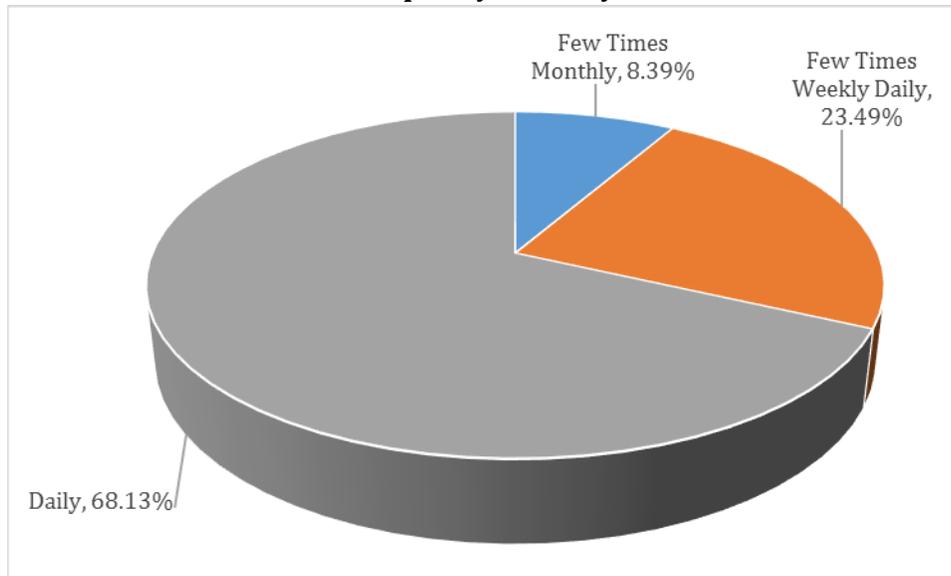
Source: RLS & Associates, Inc. Surveys: October – December 2019

### **Frequency of Use**

Exhibit 20 depicts the frequency of use by RTA passengers. Sixty-eight (68) percent of the respondents use RTA services on a daily basis. Another 23 percent use the service on a weekly basis, and 8 percent of RTA passengers reported using the service on a monthly basis (about one to three trips per month). When comparing these results to the 2016 survey, slightly more passengers are riding on a daily basis, 68 percent compared to 67 percent, while fewer passengers are riding less frequently (few times weekly and monthly).

Most of the individuals using the services on a daily basis were traveling to or from work (59 percent) and having to take more than two buses (68 percent). Those passengers who said they rode on a weekly basis were less likely to be going to work (44 percent), but more likely to be going on shopping trips (14 percent). Passengers who ride on a monthly basis were even less likely to be traveling to work (41 percent) but were more likely to be traveling to doctor or medical visits (12 percent).

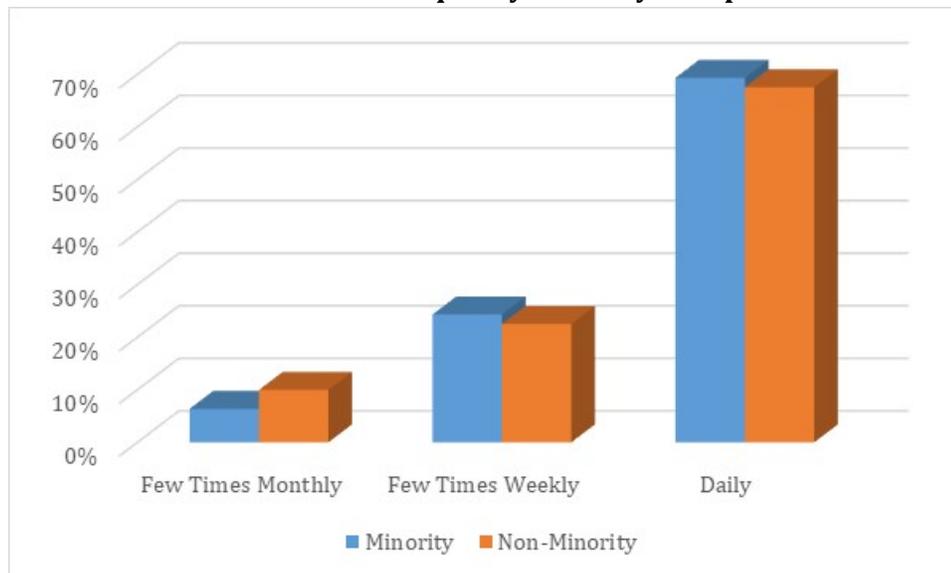
### Exhibit 20: Frequency of use by RTA Riders



Source: RLS & Associates, Inc. Surveys: October – December 2019

There are slightly fewer non-minority individuals who reported using the service on a daily basis. Likewise, slightly fewer non-minority individuals use RTA on a weekly basis. Among the non-minority passengers, 67 percent are daily riders; this is compared to 69 percent of minority passengers. See Exhibit 21 for a depiction of the frequency of use by group.

### Exhibit 21: Frequency of Use by Group



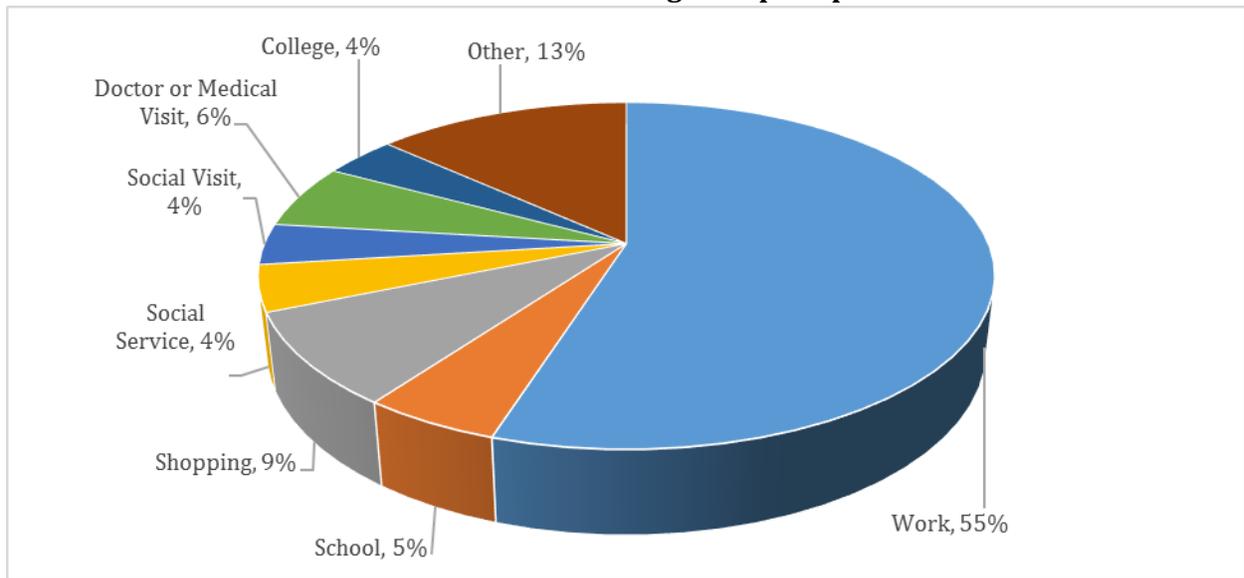
Source: RLS & Associates, Inc. Surveys: October – December 2019

## **Trip Purpose**

Fifty-five (55) percent of RTA survey respondents use the bus to travel to or from work; the highest reported trip purpose. The second highest trip purpose is “other” at 13 percent. Some of the “other” trips included, church, bank, library, and job seeking. Four percent, the smallest portion of survey respondents, are traveling to or from college, social services, and social visits. Exhibit 22 depicts the survey responses by trip purpose.

The survey results were then compared to the 2016 Title VI to show consistency. Fifty-four (54) percent of respondents in 2016 stated they were going to work, while the second highest response rate was 11 percent who were going shopping or “other”. “Other” trips rose from 11 percent in 2016 to 13 percent in 2019. The difference in results can most likely be attributed to the time of year and locations surveys were collected. Surveying was done closer to the end of the calendar year, and fewer surveys were collected at Wright Stop Plaza. The remaining categories had similar results.

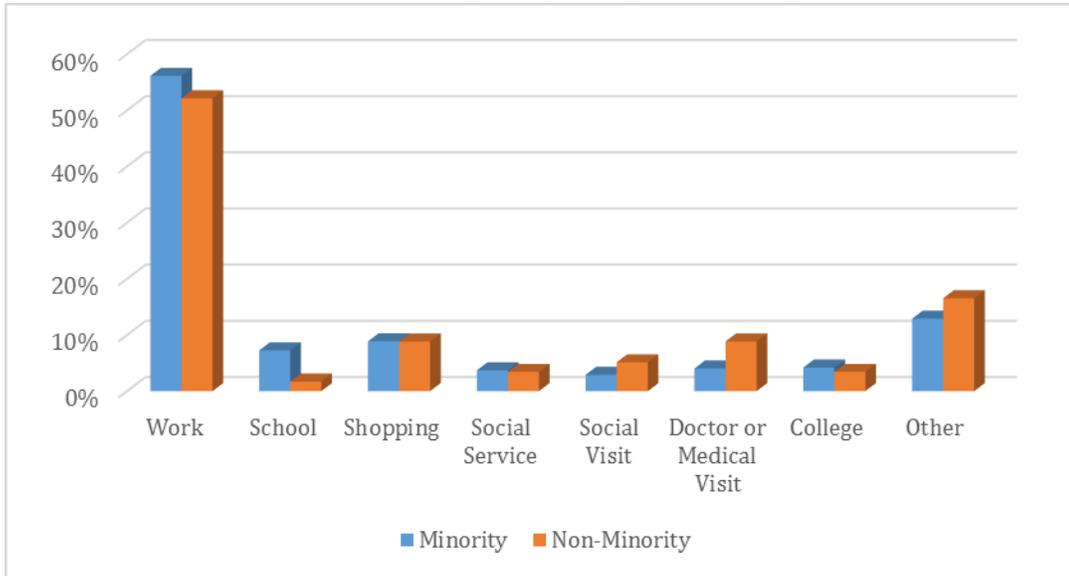
**Exhibit 22: RTA Passenger Trip Purpose**



Source: RLS & Associates, Inc. Surveys: October – December 2019

In both user groups, work was the most common trip purpose, being so for 56 percent of minority respondents and 52 percent of non-minority respondents. School trips showed the most discrepancy between minority and non-minority passengers. Minorities were more likely to be going to school than non-minority individuals. Specifically, school was the main trip purpose for seven (7) percent of the minority respondents and two (2) percent for non-minority respondents. The second largest gap between user groups was doctor or medical visits. Nine (9) percent of non-minority riders stated they were going to doctors or medical visits, while only four (4) percent of minority riders were going to the doctors or other medical related appointment. Survey data by user group and trip purpose is summarized in Exhibit 23.

**Exhibit 23: Trip Purpose by User Group**



Source: RLS & Associates, Inc. Surveys: October – December 2019

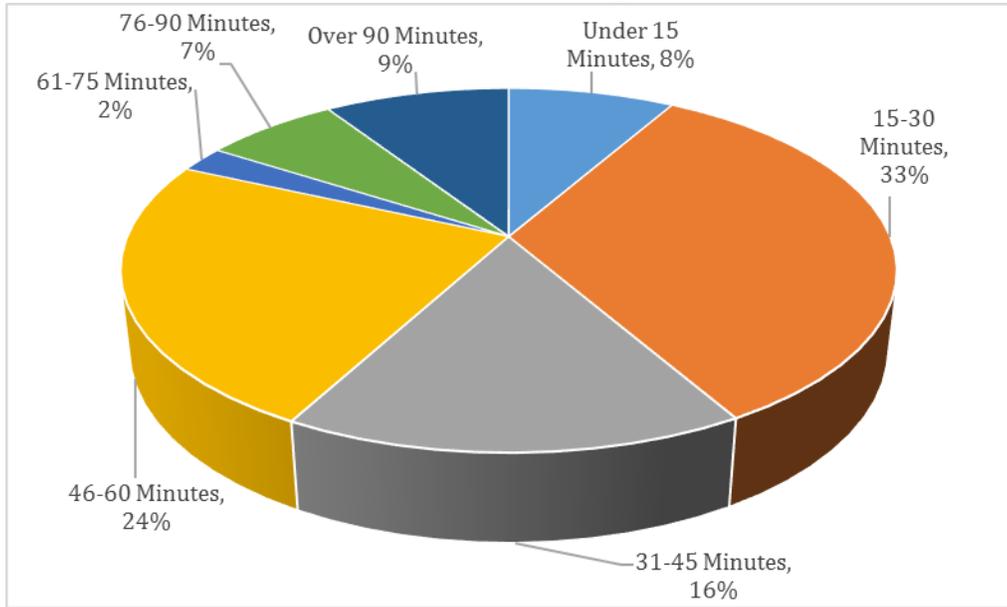
### **Average Trip Time**

As illustrated in Exhibit 24, the largest percentage (33 percent) of passengers surveyed claim an average trip length between 15-30 minutes. The second largest percentage (24 percent) indicated they ride for an average of 46-60 minutes each trip. The overall average trip length for RTA survey respondents was a little over 50 minutes.

There are a couple significant differences between minority and non-minority trip times. Minorities are more likely to have a trip that takes less than 45 minutes while non-minorities are more likely to have trips that take longer than 45 minutes. The average trip time for minorities was 45 minutes while it took non-minorities almost 59 minutes for each trip. Exhibit 25 depicts the length of trip times by user group.

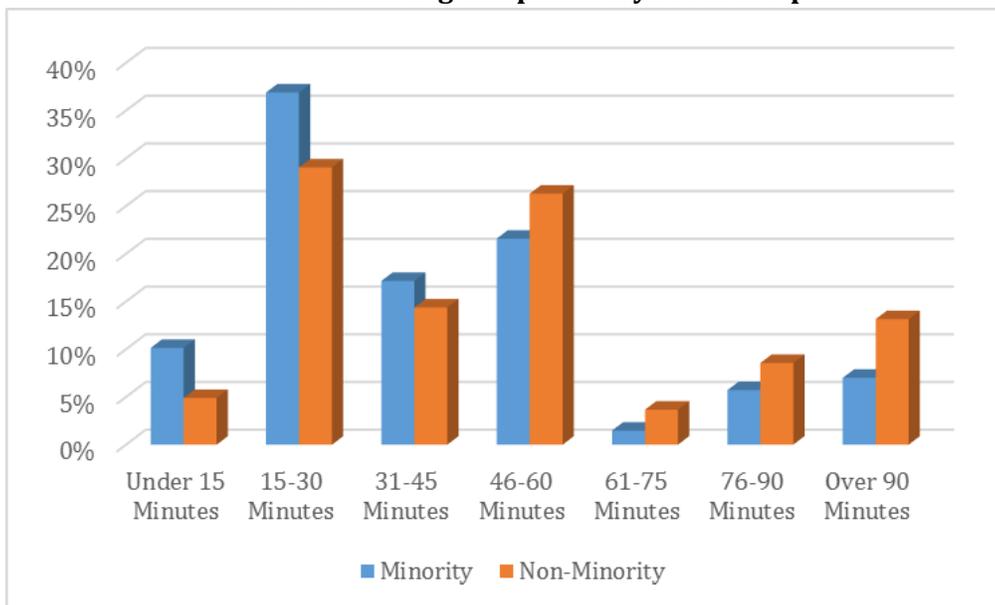
In comparison to the 2016 survey results, trips took more time. In 2016, 60 percent of trips took less than 45 minutes; while in 2019, 57 percent of trips took less than 45 minutes. Longer trip times can be attributed to fewer routes being run than in 2016. This can be seen in the increase in bus transfers from 2016 to 2019.

**Exhibit 24: Travel Time from Origin to Destination**



Source: RLS & Associates, Inc. Surveys: October – December 2019

**Exhibit 25: Average Trip Time by User Group**



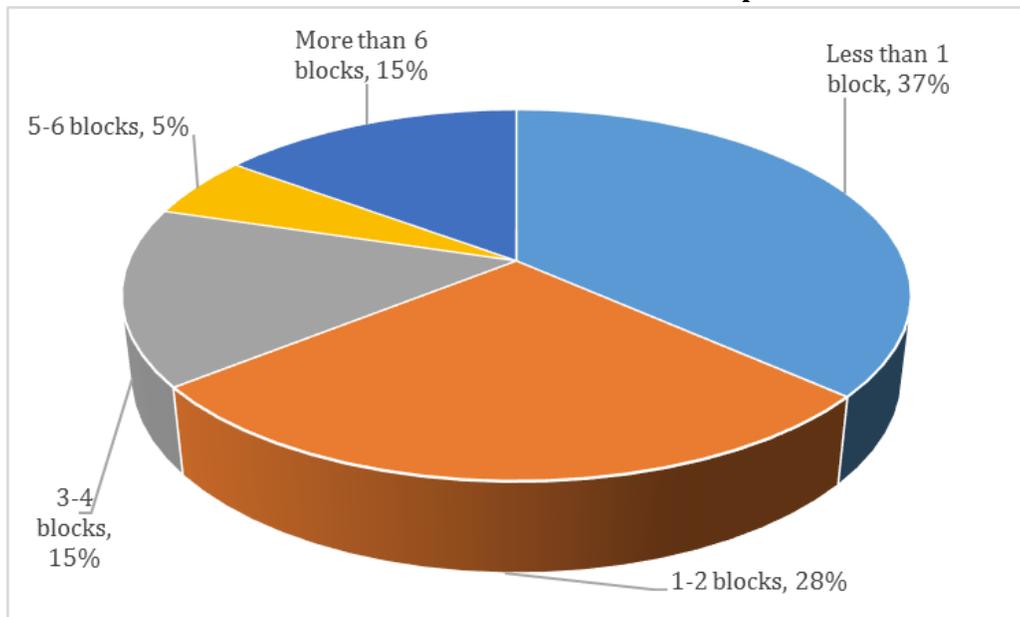
Source: RLS & Associates, Inc. Surveys: October – December 2019

## **Distance to Bus Stop**

Exhibit 26 illustrates the distance to the nearest bus stop for all survey respondents. Thirty-seven (37) percent of survey respondents reported traveling less than one block to the nearest RTA bus stop. Conversely, 15 percent of passengers had to travel more than six blocks to get to the nearest bus stop. The remaining survey respondents reported various distances between one and six blocks.

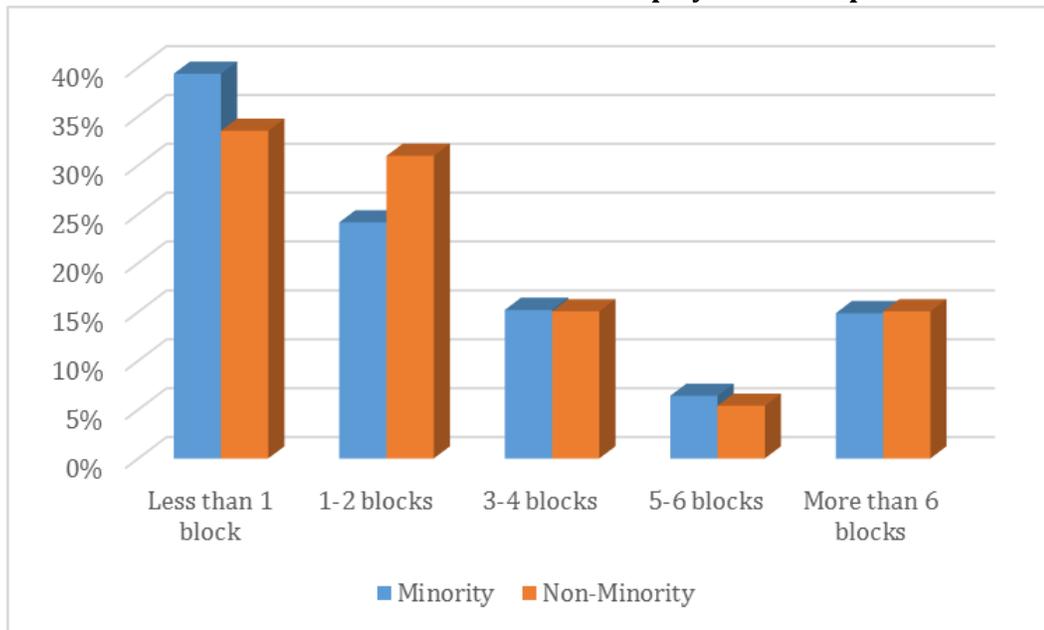
Exhibit 27 depicts the distance to the bus stop by user group. Over 39 percent of minority respondents travel a distance of less than one block to their bus stop whereas only 34 percent of non-minority passengers had the same distance to travel. This then results in non-minority passengers having to travel 1-2 blocks at a higher percentage than minority passengers. Both groups were nearly even with the bus stop distances being between three or more blocks from their homes. Compared to the 2016 Title VI survey, the distance to stop results are similar, except those who travel 1-2 blocks to the stop, were the discrepancy between minority and non-minority passengers is greater in 2019. This could be attributed to fewer routes and fewer stops than the RTA previously had in 2016.

**Exhibit 26: Overall Distance to Stop**



Source: RLS & Associates, Inc. Surveys: October – December 2019

**Exhibit 27: Distance to the Bus Stop by User Group**



Source: RLS & Associates, Inc. Surveys: October – December 2019

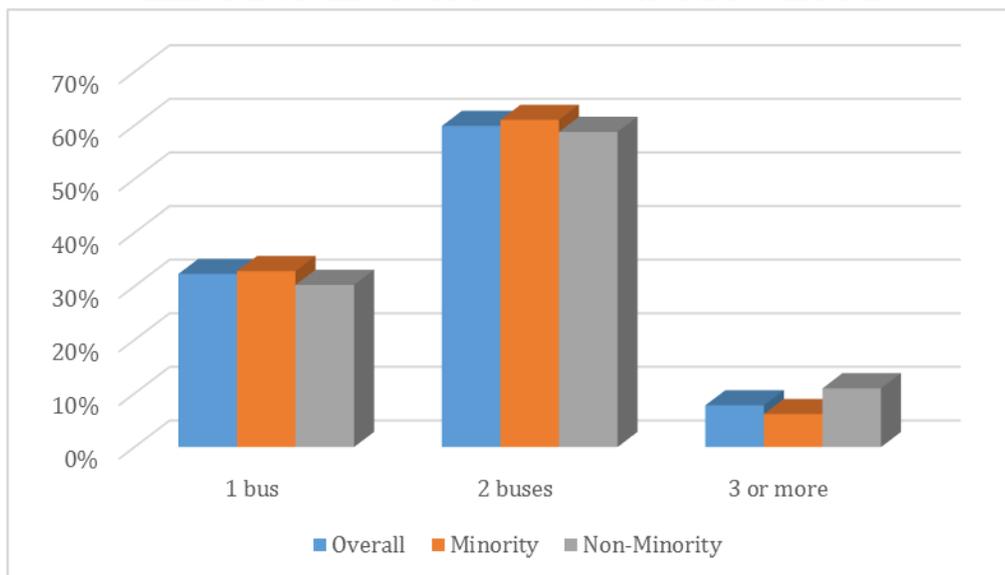
### **Transfers**

The use of more than one bus to reach a passenger’s destination means that either a transfer is involved or the passenger has more than one destination. Over 68 percent of RTA riders who participated in the survey use two or more buses to get to their final destination. This means that over two thirds of RTA passengers must make at least one transfer. Fewer than 32 percent of passengers take one bus to arrive at their destinations.

The number of minority riders that use two buses on their trip constitutes 61 percent of the minority ridership. This is very similar to non-minority riders who use two buses 59 percent of the time. The largest difference between minority and non-minority riders is the use of three or more buses. Six (6) percent of minority riders use three or more buses to reach their destination. while a little more than 11 percent of non-minority riders use three or more buses.

Most routes operate to Wright Stop Plaza where a passenger traveling across town can transfer to the second bus. There were slight differences in the amount of transfers needed for minority and non-minority riders. A higher percentage of minority riders (33 percent) could complete most trips using one bus as compared to non-minority riders (30 percent). More non-minority riders (70 percent) need to make at least one transfer as compared to minority riders (67 percent). Exhibit 28 depicts the number of buses used to reach the final destination by user group.

**Exhibit 28: Number of Buses Used to Reach Destination**

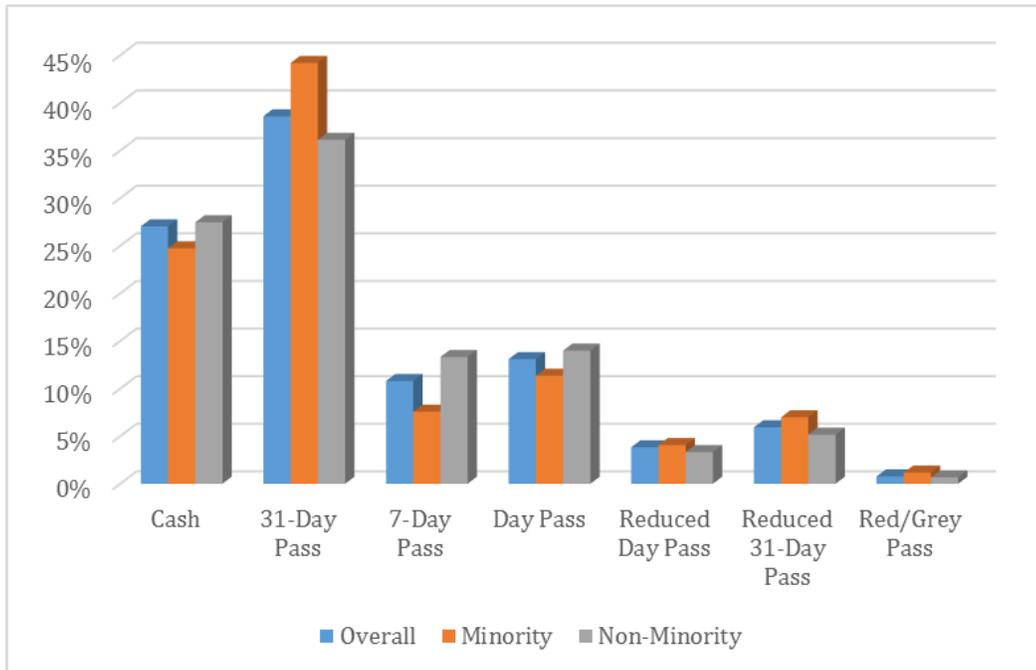


Source: RLS & Associates, Inc. Surveys: October – December 2019

### **Fare Payment**

A 31-Day Pass is the most common form of fare payment used by RTA passengers, at over 39 percent. Both minority and non-minority user groups reported using similar fare mediums. More minority riders reported paying with a 31-Day Pass (44 percent), compared to 36 percent of non-minority passengers. Exhibit 29 depicts the fare medium used.

**Exhibit 29: Fare Medium Used**



Source: RLS & Associates, Inc. Surveys: October – December 2019

Exhibit 30 shows a cross-tabulation between income level and fare medium used. For all of the income categories except more than \$200,000, 31-Day Pass was the most used form of payment. Cash was the second most commonly used fare medium by all income levels, except \$150,000-\$199,999, where the 7-Day Pass was the second most commonly used fare medium.

**Exhibit 30: Fare Medium by Income Level**

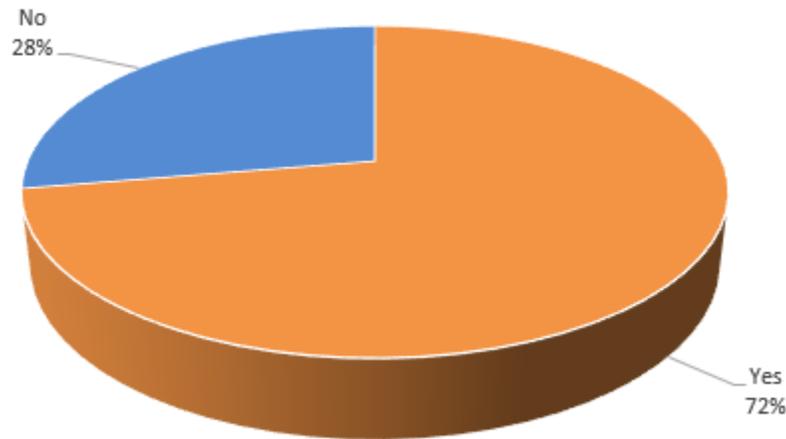
Income Category	Cash	31-Day Pass	7-Day Pass	Day Pass	Reduced Day Pass	Reduced 31-Day Pass	Red/Grey Pass
Less than \$15,000	30%	38%	9%	11%	4%	7%	1%
\$15,000-\$24,999	21%	41%	16%	11%	5%	5%	1%
\$25,000-\$34,999	25%	34%	16%	17%	3%	5%	0%
\$35,000-\$74,999	22%	42%	11%	11%	2%	8%	3%
\$75,000-\$99,999	29%	48%	6%	10%	3%	3%	0%
\$100,000-\$149,999	20%	20%	20%	40%	0%	0%	0%
\$150,000-\$199,999	33%	0%	67%	0%	0%	0%	0%
More than \$200,000	50%	20%	0%	10%	10%	10%	0%

Source: RLS & Associates, Inc. Surveys: October – December 2019

## **Reloadable Fare Card**

Exhibit 31 shows how many RTA passengers, who responded to the survey, were willing to use reloadable fare cards. Almost three-quarters of the respondents (72 percent) stated that they would be willing to use the reloadable cards, which would replace the disposable cards currently used.

**Exhibit 31: RTA Customers Willing to use Reloadable Fare Cards**

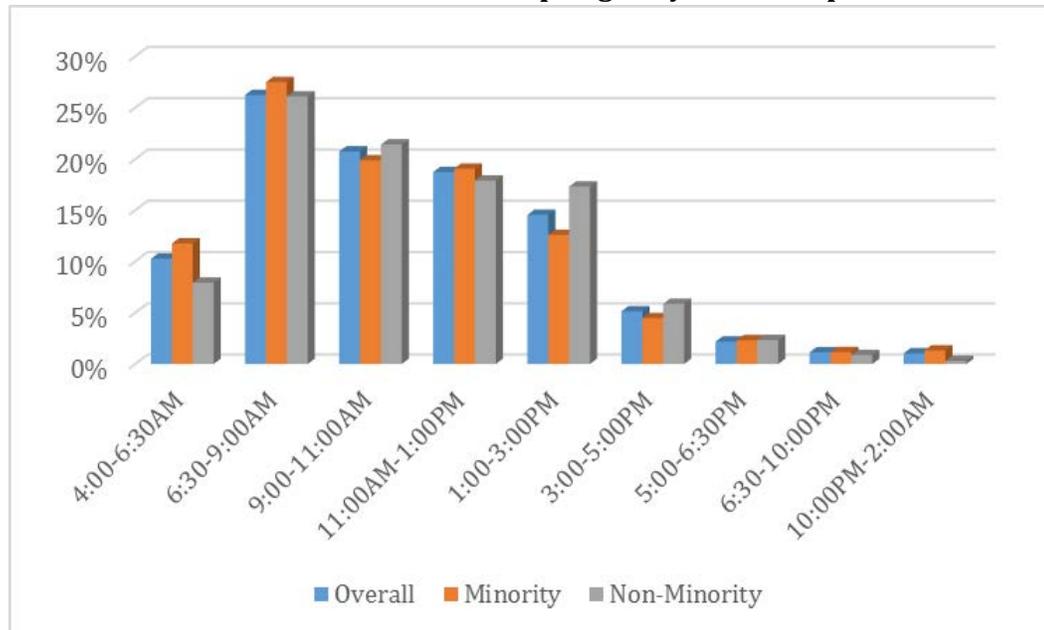


Source: RLS & Associates, Inc. Surveys: October – December 2019

## **Time of Travel**

The survey was conducted during peak and non-peak hours and on every day of the week. The survey results show that the respondents were more likely to begin their trip between 6:30 AM and 11:00 AM. Results of the survey reveal that the time of travel among minority and non-minority riders, and the overall results, are consistent. The one significant difference in the time of day respondents started their trip was the 1:00 PM to 3:00 PM time slot. Nearly 17 percent of non-minority respondents started their trip between 1:00 PM and 3:00 PM while only 13 percent of minority respondents started their trip at that time. Minorities were then more likely to start their trip between 4:00 AM and 6:30 AM as compared to non-minorities. Exhibit 32 depicts the time passengers began their bus trips. The graph is divided into non-minority, minority, and all passengers.

**Exhibit 32: Time the Trip Began by User Group**



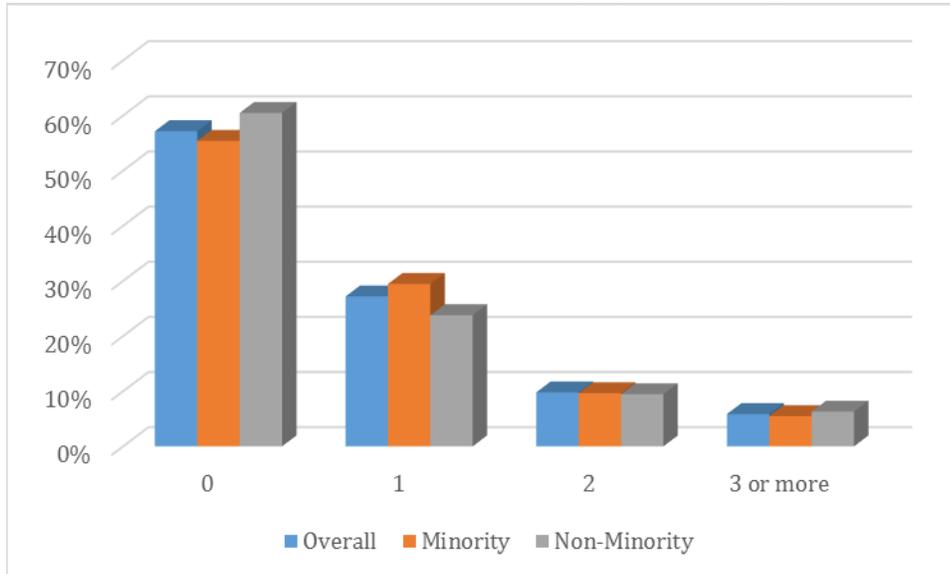
Source: RLS & Associates, Inc. Surveys: October – December 2019

**Vehicle Availability**

Exhibit 33 depicts the availability of vehicles per household. The majority of passengers reported having no available vehicles; this category made up 57 percent of the total responses. This represents a 10 percent decrease over the 2016 survey. Twenty-seven (27) percent reported having one vehicle available for their household. Sixteen (16) percent reported two or more vehicles available. With the decrease in zero vehicle households, one, two, and three or more vehicles households increased from the 2016 survey results.

Exhibit 33 also depicts the availability of vehicles per household by user group. A slightly higher percentage (60 percent) of non-minorities had zero vehicles available as compared to minority survey respondents (55 percent). Slightly more minority households have vehicles available as compared to non-minorities.

**Exhibit 33: Vehicle Availability by User Group**

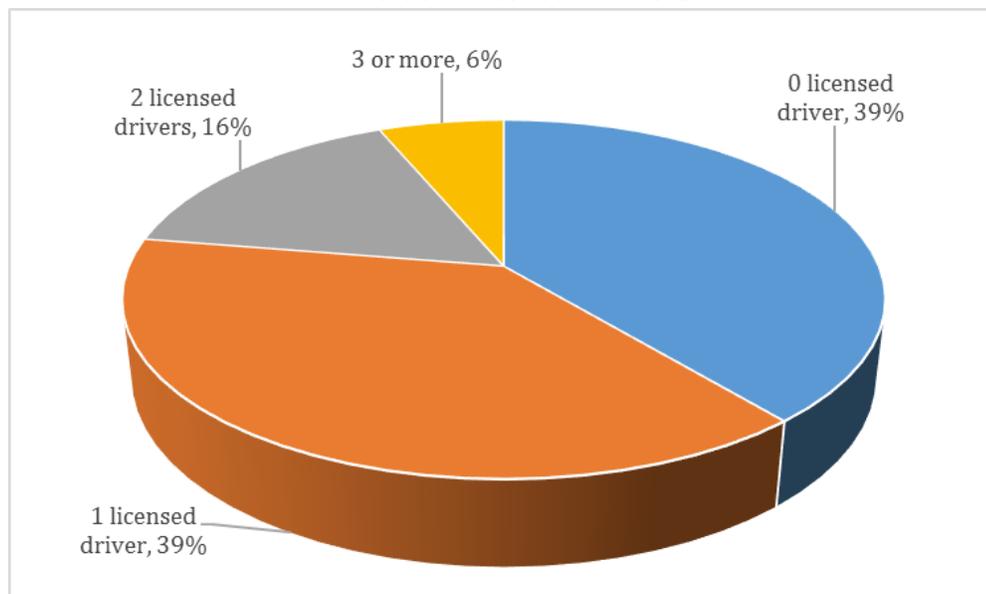


Source: RLS & Associates, Inc. Surveys: October – December 2019

**Licensed Drivers**

As a follow up question to vehicles available at their household, survey respondents were also asked to report how many licensed drivers were living in their household. Exhibit 34 shows that even though most surveyed households did not have cars (57 percent) only 39 percent did not have any licensed drivers in their household. That means 61 percent of survey respondents have a household member with a valid driver’s license.

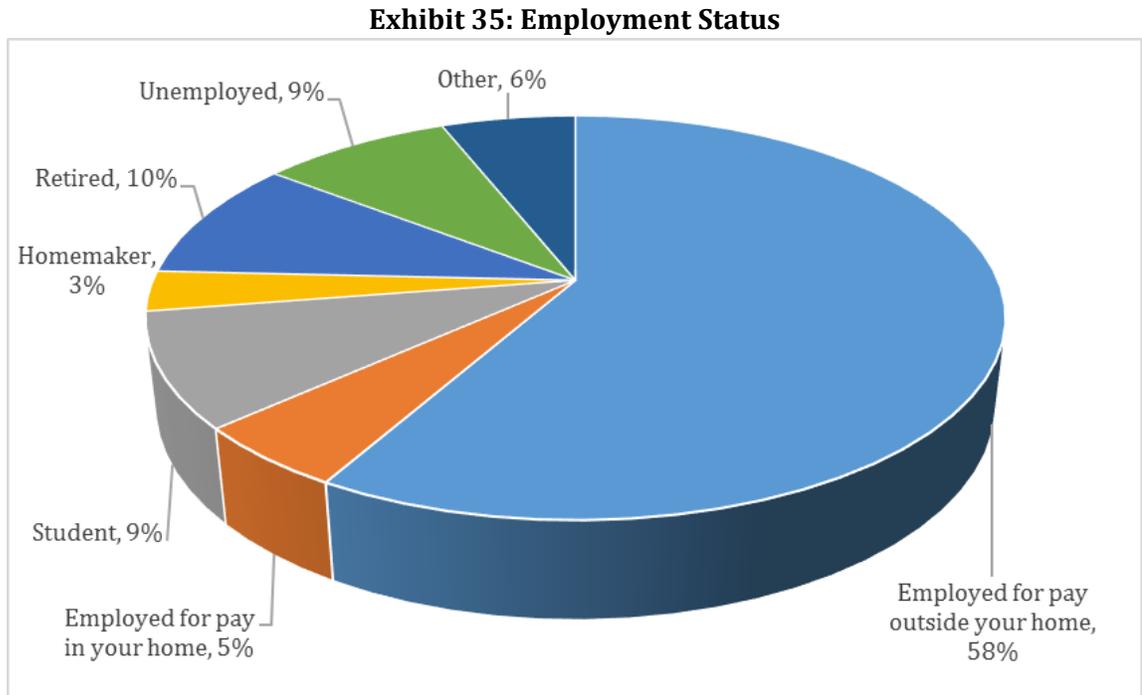
**Exhibit 34: Licensed Drivers**



Source: RLS & Associates, Inc. Surveys: October – December 2019

## **Employment Status**

To better understand who is riding RTA buses, respondents were asked to provide their employment status. Over 58 percent of RTA respondents were employed for pay outside their home. The next highest response was from those passengers that were retired (10 percent). Exhibit 35 depicts the breakdown of employment status for RTA passengers.



Source: RLS & Associates, Inc. Surveys: October – December 2019

## **Origins and Destinations**

Another way for the RTA to continue to ensure equitable services is to understand the travel patterns of its riders. For this purpose, survey respondents were asked to provide the starting and ending point for their current trip. Some of the frequent responses included:

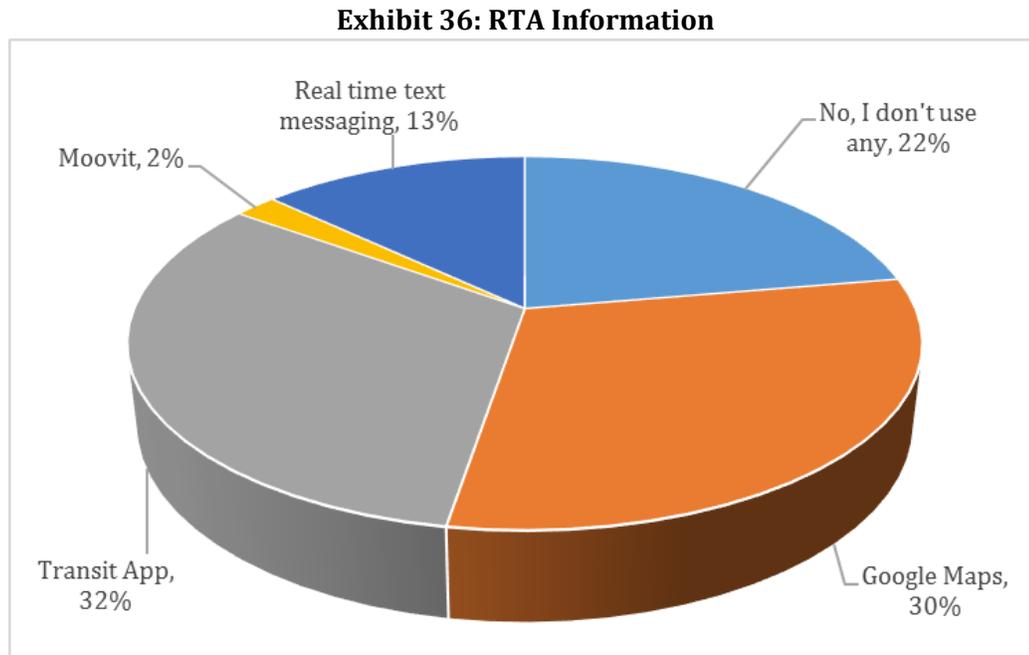
- ◆ Downtown
- ◆ Germantown
- ◆ Gettysburg Ave.
- ◆ Main St.
- ◆ Northwest Hub
- ◆ Salem Ave.
- ◆ South Hub
- ◆ Westtown Hub
- ◆ Wilmington Pike

- ◆ Wright Stop Plaza

Appendix A lists all of the starting and ending points listed by survey respondents.

**RTA Information**

Respondents were asked if they use any smartphone apps or services that provide RTA information. Exhibit 36 illustrates that the most used smartphone service was the Transit App, closely followed by Google Maps and those who don't use any smartphone apps or services. This question wasn't asked during the 2016 survey, thus no comparisons can be made.

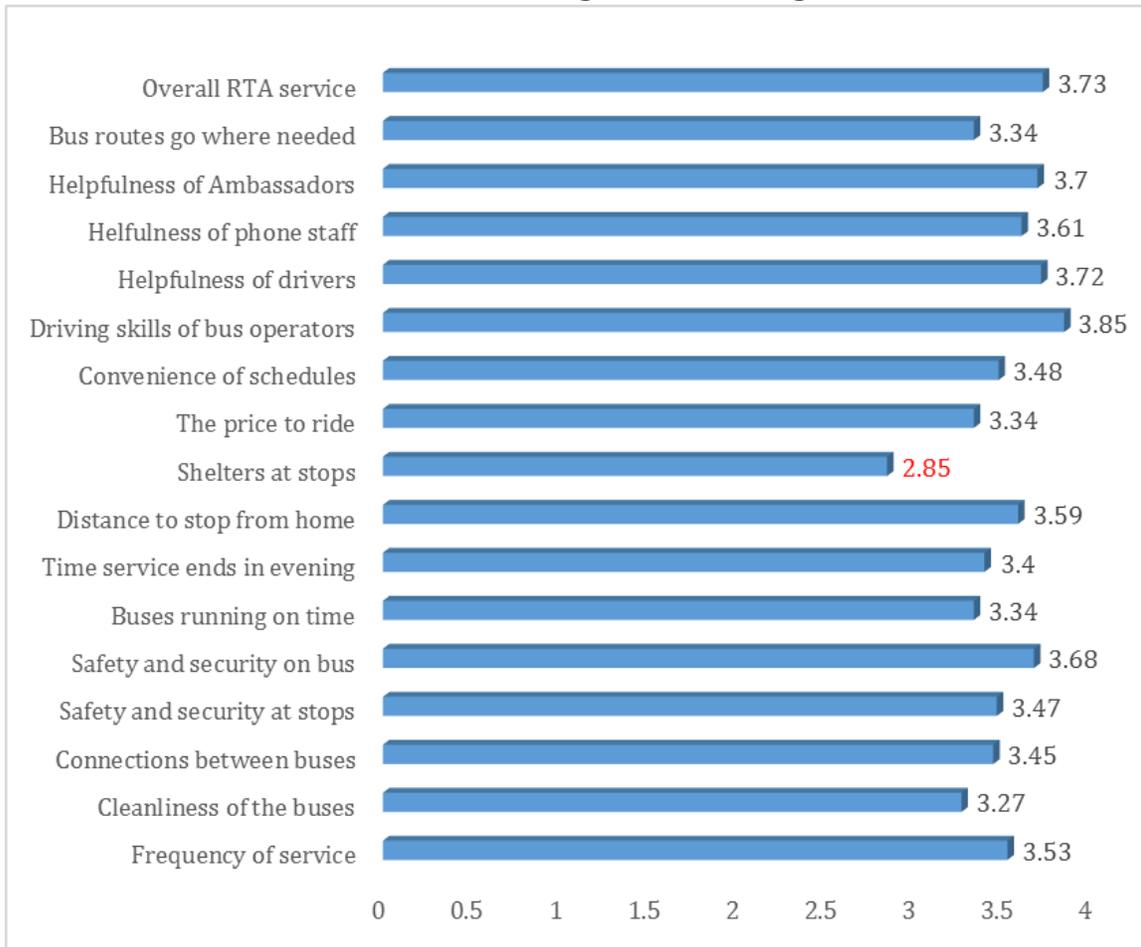


Source: RLS & Associates, Inc. Surveys: October – December 2019

**SERVICE RATINGS**

Passengers were asked to rate 17 different aspects of the RTA service on a scale of one through five, with five being the highest. Average scores were then calculated for each service category. Results are summarized in Exhibit 37. Overall, passengers were most satisfied with the driving skills of the bus operators. The next highest average service ratings was the helpfulness of the drivers. Shelters at stops was overwhelmingly rated the lowest with an average rating of 2.85. The cleanliness of the buses was also rated low with an average score of 3.27. The biggest difference between the survey results in 2016 and 2019 is the passengers rating for the bus routes going where needed. In 2019, the bus routes going where needed had an average rating of 3.34 while in 2016 the bus routes going where needed had an average rating of 3.76.

**Exhibit 37: Average Service Rating**

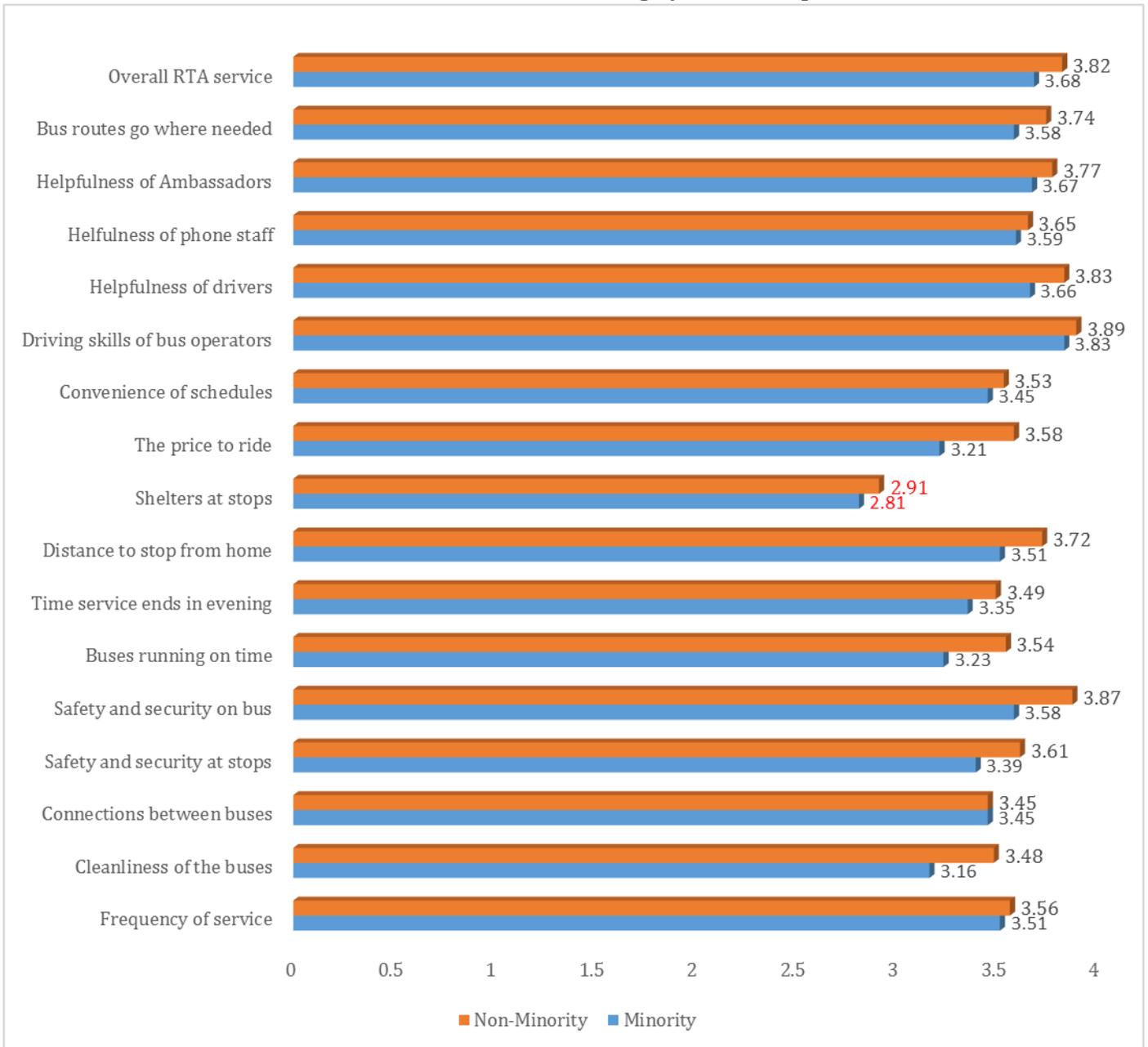


Source: RLS & Associates, Inc. Surveys: October – December 2019

**Service Rating by User Group**

Exhibit 38 compares the ratings from the survey responses of each rider group. The orange column represents the non-minority user group and the blue column represents the minority user group. Non-minority and minority riders reported being most satisfied with the driving skills of the bus operators. Minority and non-minority groups ranked shelters at stops the lowest. The price to ride, Cleanliness of the buses, and buses running on time were the three categories that minorities and non-minorities rated significantly different. In all three cases minorities on average ranked the categories lower than non-minorities.

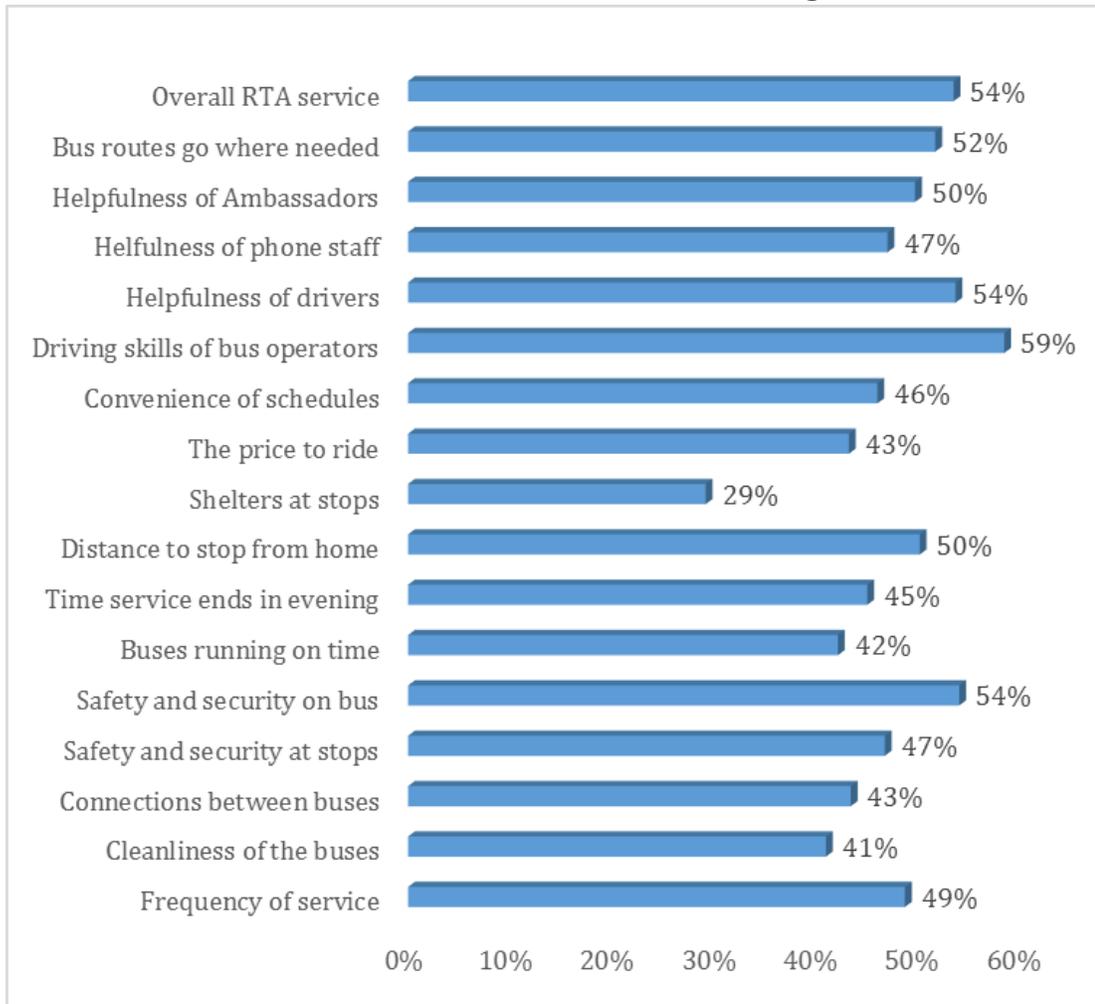
**Exhibit 38: Service Rating by User-Group**



Source: RLS & Associates, Inc. Surveys: October – December 2019

Exhibit 39 illustrates the percentage of survey respondents who scored a “4” or “5” (good to very good) in each of the service categories. The categories that scored above a “good” rating by more than 50 percent of the survey respondents include *Driving skills of bus operators*, *Helpfulness of drivers*, *Safety and security on bus*, *Overall RTA service*, *Bus routes go where needed*, *Helpfulness of Ambassadors*, and *Distance to stop from home*. Of these categories, the greatest number of respondents reported being “very satisfied” with the driving skills of the bus operator. Buses running on time and shelters at stops were the lowest rated from survey respondents.

### Exhibit 39: Good to Excellent Service Ratings



Source: RLS & Associates, Inc. Surveys: October – December 2019

## CONCLUSIONS

The survey described herein was completed to document the Greater Dayton Regional Transit Authority’s (RTA) compliance with the requirements of the Title VI Regulations, outlined in FTA Circular 4702.1B. These standards are required for all public transportation providers with a population of 200,000 or greater receiving Federal Transit Administration (FTA) funding under 49 U.S.C. 5307 (Urbanized Area Formula Program).

RTA contracted with RLS & Associates, Inc. to collect and analyze racial and ethnic data showing the extent to which members of minority groups are beneficiaries of RTA services. To gather this data, RLS staff members, along with independent contractors, conducted a rider survey of RTA passengers during the months of October, November, and December 2019. The intercept mode survey was conducted at Wright Stop Plaza, and on all routes throughout the RTA service area. Careful consideration was given to target minority, non-minority, and low-income locations during core

service hours (6:30 AM to 9:00 AM as well as 3:30 PM to 6:30 PM) on weekdays and weekends. The majority of the surveys were collected while riding all of the RTA routes. Some of the surveys were collected at Wright Stop Plaza. Because many RTA passengers transfer at Wright Stop Plaza, this method ensured that riders from the entire service area were provided an opportunity to participate in the survey. When it was determined that certain areas of the community were not connected to transit centers, surveyors boarded routes in those locations (whether city or county) and conducted on-board surveys of passengers as they boarded the bus. Those passengers were asked to return the finished survey when exiting the bus.

Following the completion of the surveys, RLS carefully analyzed the data collected and determined that RTA offers service to all populations, specifically including minority, non-minority, LEP, and low-income populations. This service is offered without regard to race, color, or national origin and is, therefore, in compliance with the Title VI and Environmental Justice regulations.

To document these findings, RLS prepared demographic and service profile maps, which are included in this report. The maps were prepared using Geographic Information System (GIS) technology. A base map of RTA's service area is included as Exhibit 2. This map includes cities, major streets and highways, all RTA routes, RTA facilities, major employers, and zip codes. Exhibits 7 and 8 are demographic maps that shade those census block groups where minority and non-minority individuals reside. Exhibits 9 and 10 depict the distribution of minority and non-minority residents throughout the RTA service area, as reported in the survey. Exhibit 16 depicts the census block groups of Limited English Proficient (LEP) individuals throughout Montgomery County. Exhibit 17 depicts the zip codes of LEP survey respondents.

The surveys showed several interesting patterns about travel and transfers. Respondents were asked how many buses they had to ride in order to reach their intended destination. Sixty-seven (67) percent of minority riders and 70 percent of non-minority riders stated they needed to make at least one transfer. This leads to more minorities being able to take one bus (33 percent) compared to non-minorities (30 percent). When indicating how long their trip took from origin to destination, minority and non-minority responses differed. Over 26 percent of non-minority passengers stated their trip took more than 60 minutes while only 14 percent of minority passengers stated their trip took that long. The longer trips times for non-minorities can be attributed to the distance they have to walk to reach their closes bus stop. Sixty-six (66) percent of non-minorities have to walk more than one (1) block to their closes stop, while 61 percent of minorities have to walk the same distance. Among other variables, such as route length, ridership numbers on a bus, and frequent stops, most trip times can be attributed to the amount of transfers a rider needs to make in order to reach their intended destination. Based on survey results it can be inferred that non-minorities are making fewer transfers but are riding on routes for longer times due to route length and access to stops.

RLS distributed the RTA passenger survey as depicted in Exhibit 3 and 4, as part of the Title VI and Environmental Justice data collection process. The team collected data on race, color, national origin, income, and travel patterns of RTA passengers. The Exhibits of this report depict the results of the survey and passenger responses. RLS collected data above and beyond the requirement of FTA

Circular 4702.1B. This additional information can be used to judge the quality of service as it relates to minority and non-minority individuals and people with low-incomes.

The final section of this report summarizes the passengers' opinions of the RTA services as collected during the survey. This analysis includes questions such as general satisfaction with the system, value for fare paid, length and frequency of service, helpfulness of the staff, cleanliness of the buses, convenience, and safety. One service area this year rated higher than previous years' surveys. The rating of buses running on time rose in 2019 from an average rating of 3.27 in 2016 to 3.34. Both minority and non-minority user groups reported similarities in the service ratings but non-minorities rated the services higher in every category except connections between buses, where the rating was the same.

## DEMOGRAPHIC ANALYSIS

# Demographics

Along with the included demographic information provided in Exhibits 6 (race), 7 (minority), 8 (non-minority), 12 (annual household income), 13 (below poverty), and 16 (LEP), more in-depth demographic maps were developed. Exhibit 40 shows the census block groups in Montgomery County that have significantly high levels (above the service area average) of households below the poverty level. The total number of households below the poverty level were divided by the total household population for whom poverty status is determined. The census block groups highlighted in red indicate percentages of poverty populations above the County average. Most block groups with high percentages are located in and around the cities of Dayton, Drexel, Trotwood, Northridge, Miamisburg, New Lebanon, Englewood, and Riverside.

Exhibit 41 illustrates the census block groups in Montgomery County that have significantly high levels of minority persons. The minority population was divided by the total population of each census block group to derive the minority population percentage. The block groups highlighted in red indicate percentages of minority population above the County average. Almost all of the census block groups with high minority levels are west of Interstate 75 in the cities of Dayton and Trotwood. Pockets of high minority population percentages were found in the City of Riverside and in Jefferson Township.

Exhibit 42 combines the information provided in Exhibits 40 and 41. Significantly high minority block groups are highlighted in green while significantly high low-income block groups are highlighted in red. The block groups that have both high levels of minority and low-income populations are shown in brown. Most of the areas with significantly higher percentages of minority population also have significantly higher percentages of people living below the poverty level. Trotwood and West Dayton indicate the highest overlap in minority and low-income populations.

The U.S. Census Bureau reported in 2018 that there were 223,894 total households in Montgomery County. Exhibit 43 illustrates the percentage of households with zero vehicles available by Census block group that are higher than the County average. Areas having a density of households with zero vehicles available were concentrated in the City of Dayton, but also found throughout the County. These areas had zero vehicle rates of over 5.3 percent.

By evaluating the results of the demographic analysis, it appears that RTA is providing impartial and equitable fares and services to all user groups. Additionally, based on the evaluation of the opinions of survey respondents, RTA appears to be in compliance with Title VI of the Civil Rights Act and Environmental Justice regulations.

# Exhibit 40: Significant Low-Income by Block Groups

## Greater Dayton RTA Title VI Analysis

### Major Employers

#### Industry

-  Education
-  Employer
-  Healthcare Provider
-  RTA Hubs

 RTA Facilities (includes substations)

 Limited Access

 Highway

 Major Road

 Trolley Lines

 Routes

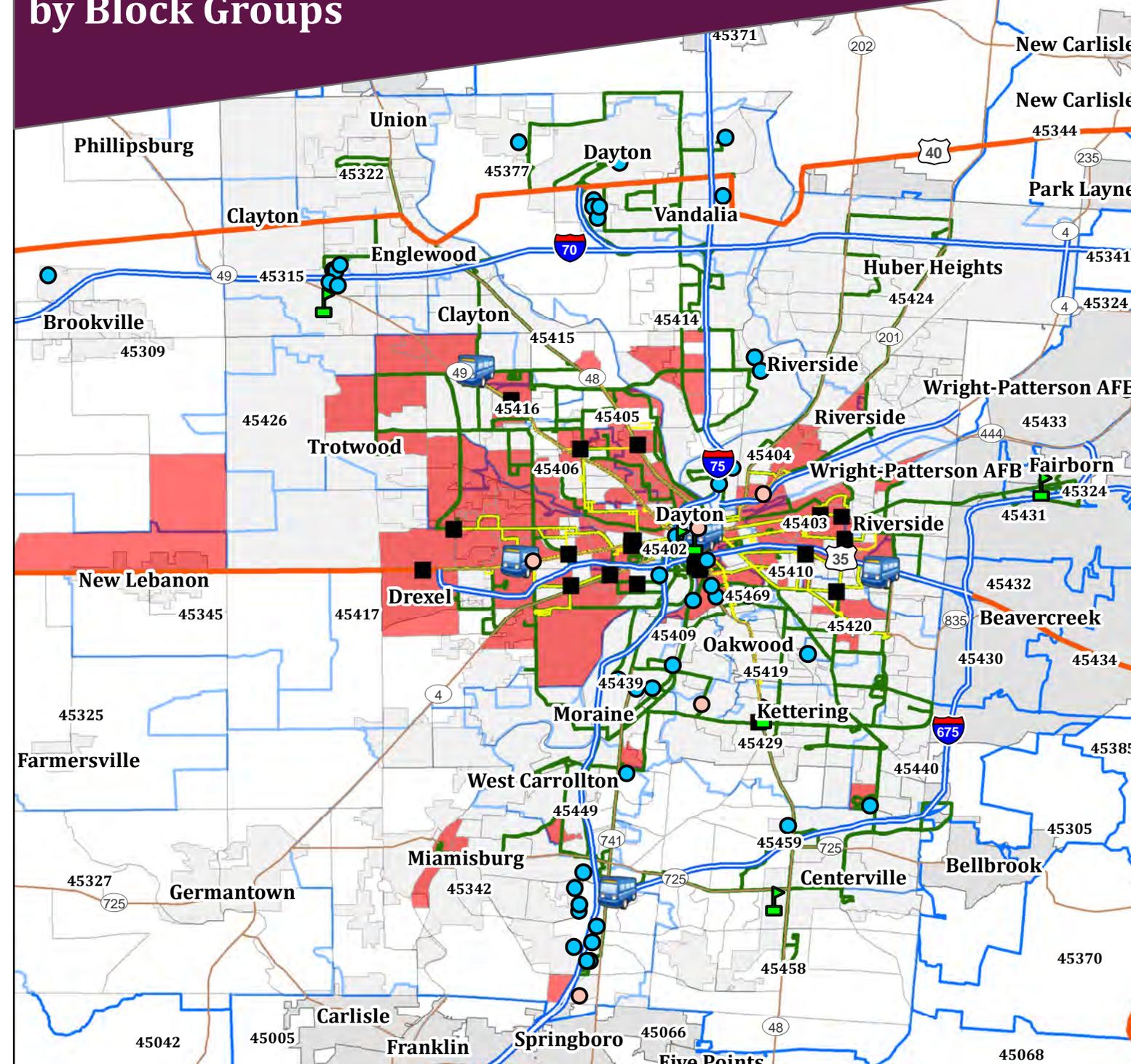
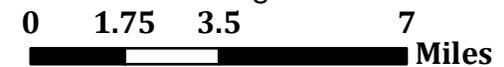
### Significant Low-Income

 0% - 16.2%

 16.3% - 84.6%

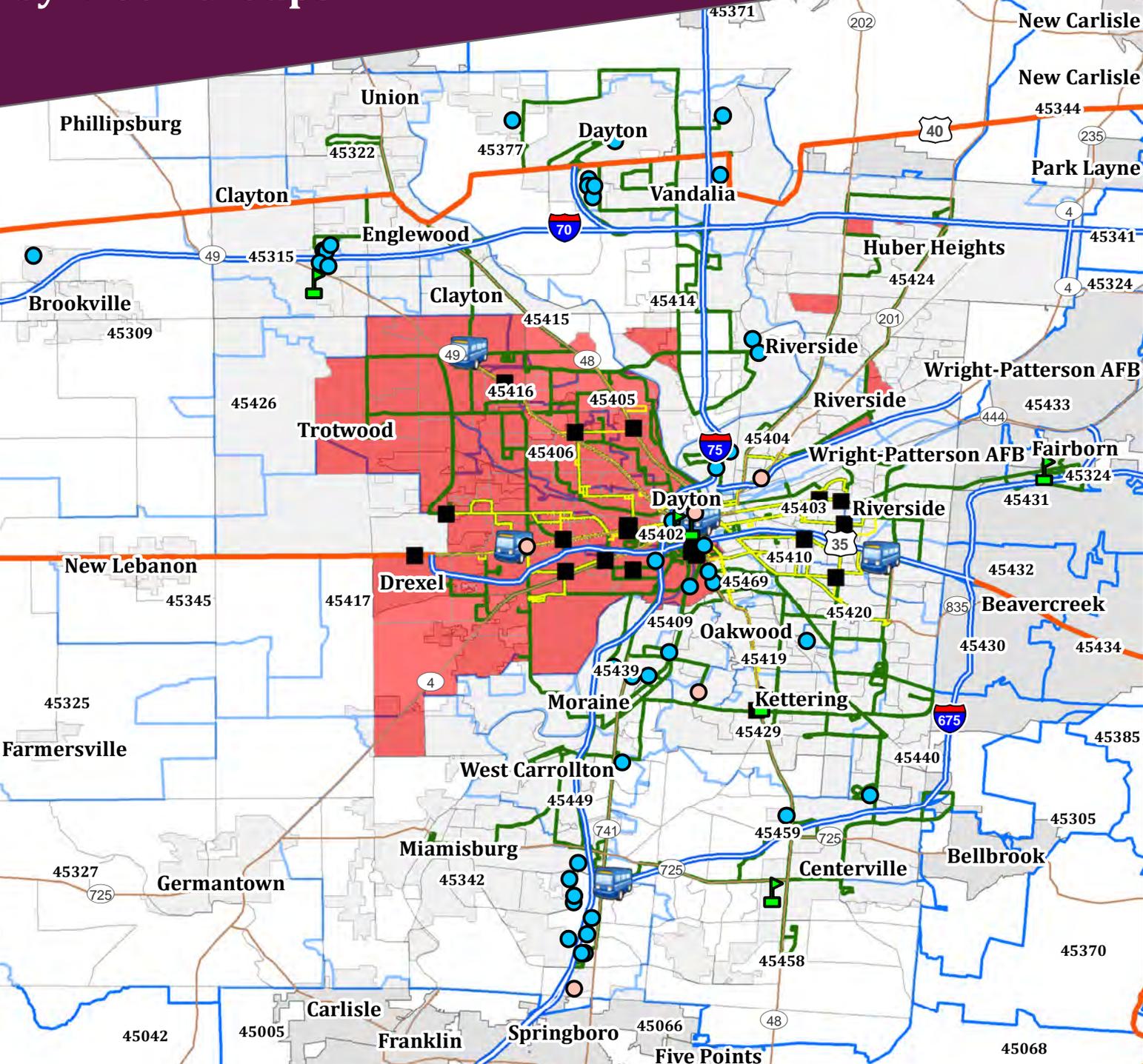
 Zip Codes

 Places



# Exhibit 41: Significant Minority Population by Block Groups

## Greater Dayton RTA Title VI Analysis



**Major Employers**

**Industry**

- Education
- Employer
- Healthcare Provider
- RTA Hubs
- RTA Facilities (includes substations)

**Significant Minority**

- 0% - 31.1%
- 31.2% - 100%
- Zip Codes
- Places

**Transportation Infrastructure**

- Limited Access
- Highway
- Major Road
- Trolley Lines
- Routes

**Scale and Orientation**

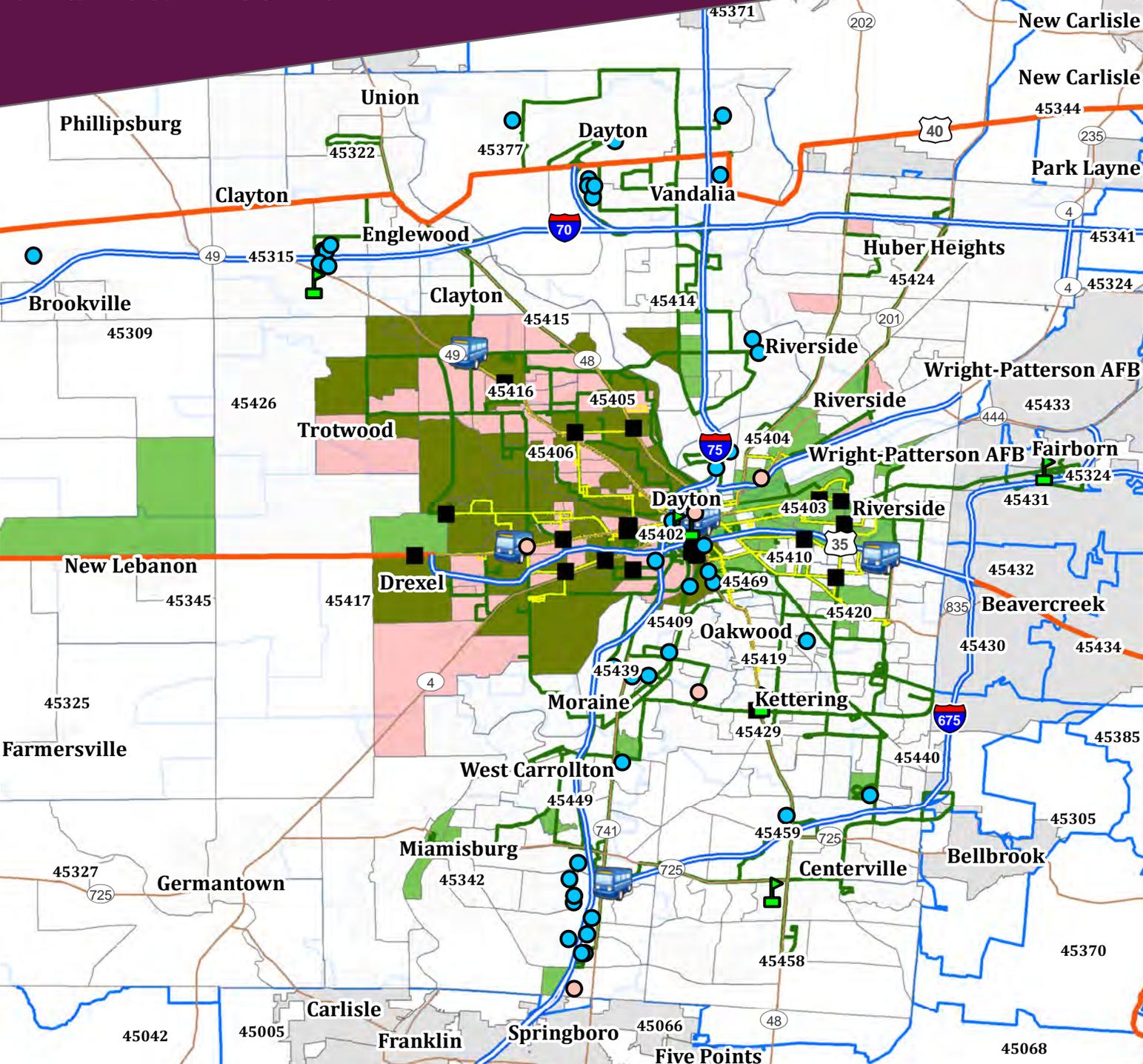
0 1.75 3.5 7 Miles

North arrow showing N, S, E, W directions.

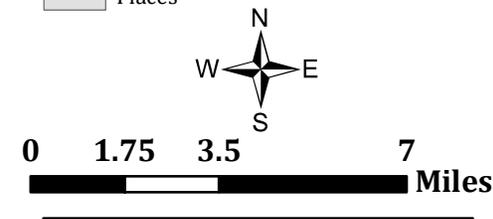


# Exhibit 42: Significant Minority Population and Low-Income

## Greater Dayton RTA Title VI Analysis

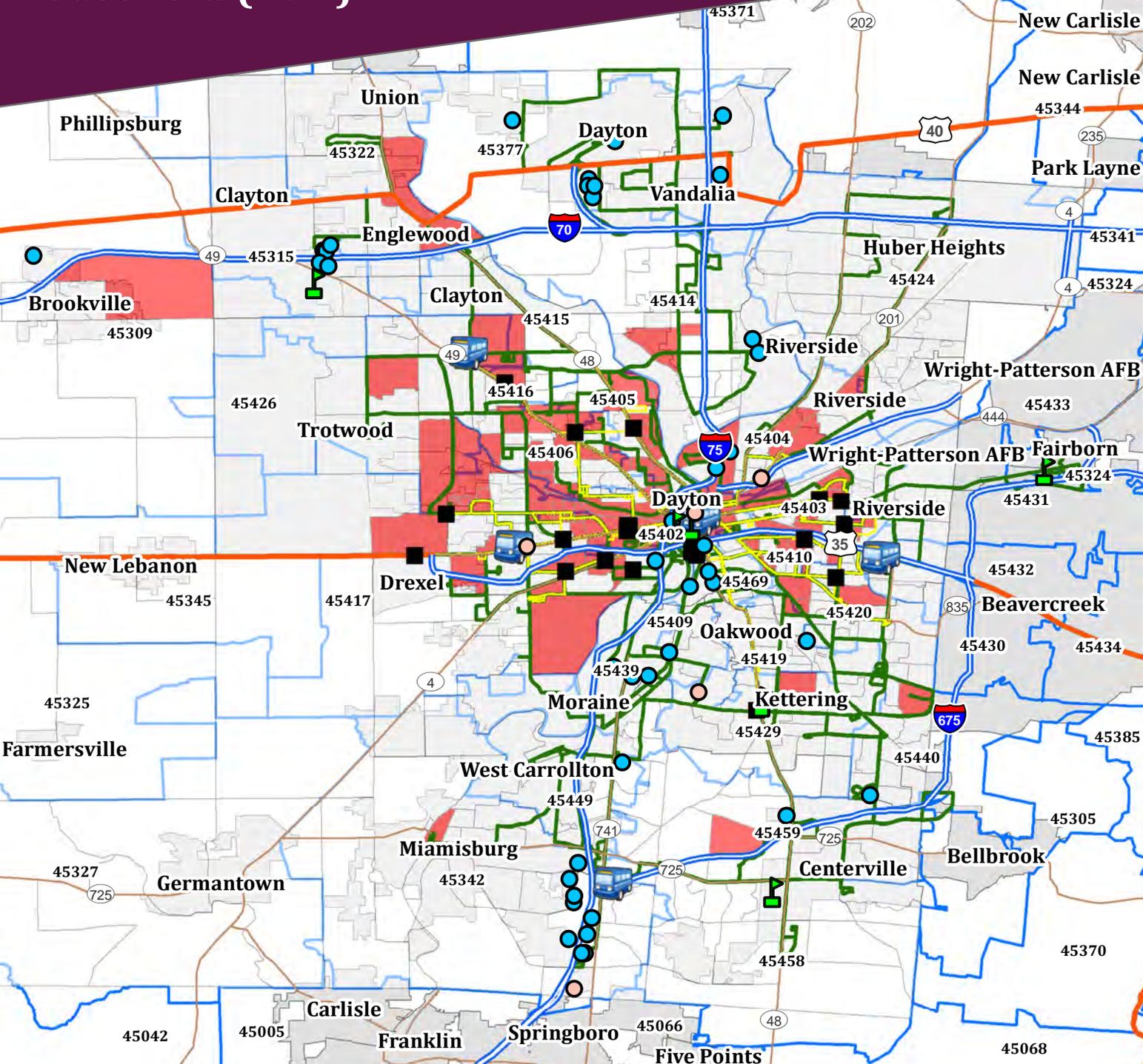


- Major Employers**
- Education (Green flag icon)
  - Employer (Blue circle icon)
  - Healthcare Provider (Red circle icon)
- RTA Hubs**
- RTA Hubs (Blue square icon)
- RTA Facilities (includes substations)**
- RTA Facilities (includes substations) (Black square icon)
- Transportation Infrastructure**
- Limited Access (Blue line icon)
  - Highway (Orange line icon)
  - Major Road (Brown line icon)
  - Trolley Lines (Yellow line icon)
  - Routes (Green line icon)
- Significant Low-Income**
- 0% - 16.2% (White square icon)
  - 16.3% - 84.6% (Green square icon)
- Significant Minority**
- 0% - 31.1% (White square icon)
  - 31.2% - 100% (Red square icon)
- Other**
- Significant Minority & Low-Income (Dark Green square icon)
  - Zip Codes (Blue outline icon)
  - Places (Grey square icon)



# Exhibit 43: Significant Zero Vehicle Household (ZVH) Household (ZVH)

## Greater Dayton RTA Title VI Analysis



**Major Employers Industry**

- Education
- Employer
- Healthcare Provider
- RTA Hubs
- RTA Facilities (includes substations)

**Significant ZVH**

- 0% - 5.2%
- 5.3% - 42.2%
- Zip Codes
- Places

**Map Features Legend:**

- Limited Access
- Highway
- Major Road
- Trolley Lines
- Routes

**Scale:** 0 1.75 3.5 7 Miles

**North Arrow:** N, S, E, W



## **POLICY AND PROCEDURE REVIEW**

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### **AMENITIES**

In order to fulfill Title VI regulations, RTA must create a database of maps to visually represent where RTA amenities and RTA funded amenities are located. Exhibit 44 is a follow-up to Exhibit 1 of this report. Exhibit 44 shows RTA hubs, facilities, bus shelters, benches, lighting, and trash receptacles overlaid on a base map that shows areas of significantly high concentrations of low-income and minority population levels.

Exhibit 45 displays transit facilities that were recently replaced, improved, or are scheduled for an updated in the next five years. The facilities that were improved were 600 Longworth St, 601 Longworth Bus Garage, 901 S. Ludlow St., Wright Stop Plaza, Eastown Hub, Northwest Hub, South Hub and Westown Hub.

### **EVALUATION OF TRANSIT SERVICE**

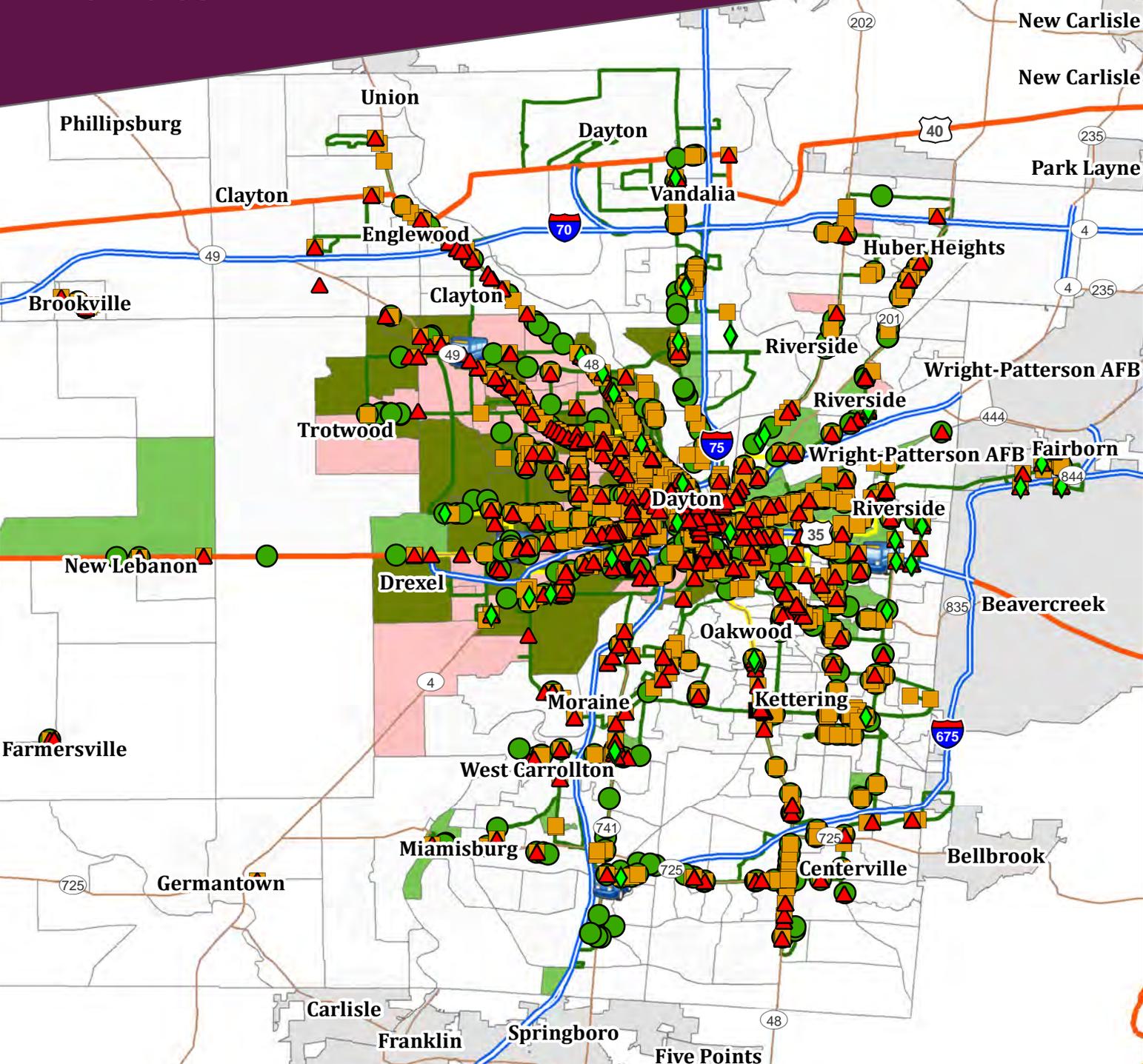
As a part of the scope of work, RLS was asked to evaluate RTA routes to determine which routes were minority or non-minority by service mode. By using demographic data, RLS grouped routes by service mode and minority or non-minority. Routes were designated as minority if at least 1/3 of the revenue miles were located in a Census block group where the percentage of minority population exceeded the average for the entire RTA service area.

<b>Route Type</b>	<b>Minority</b>	<b>Non-Minority</b>
Suburban	14, 16, 18, 19	11, 17
Local	1, 2, 4, 7, 8, 9, 12, 22	3, 5
Feeder	64, 65	66
Express	-	43, X5
Crosstown	24, 34	23
Circulator	-	Flyer

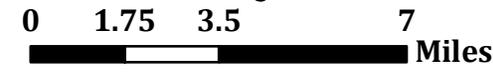
Source: 2018 American Community Survey (ACS) Five-Year Estimates,  
RLS & Associates, Inc., & Greater Dayton RTA

# Exhibit 44: Greater Dayton RTA Amenities

## Greater Dayton RTA Title VI Analysis

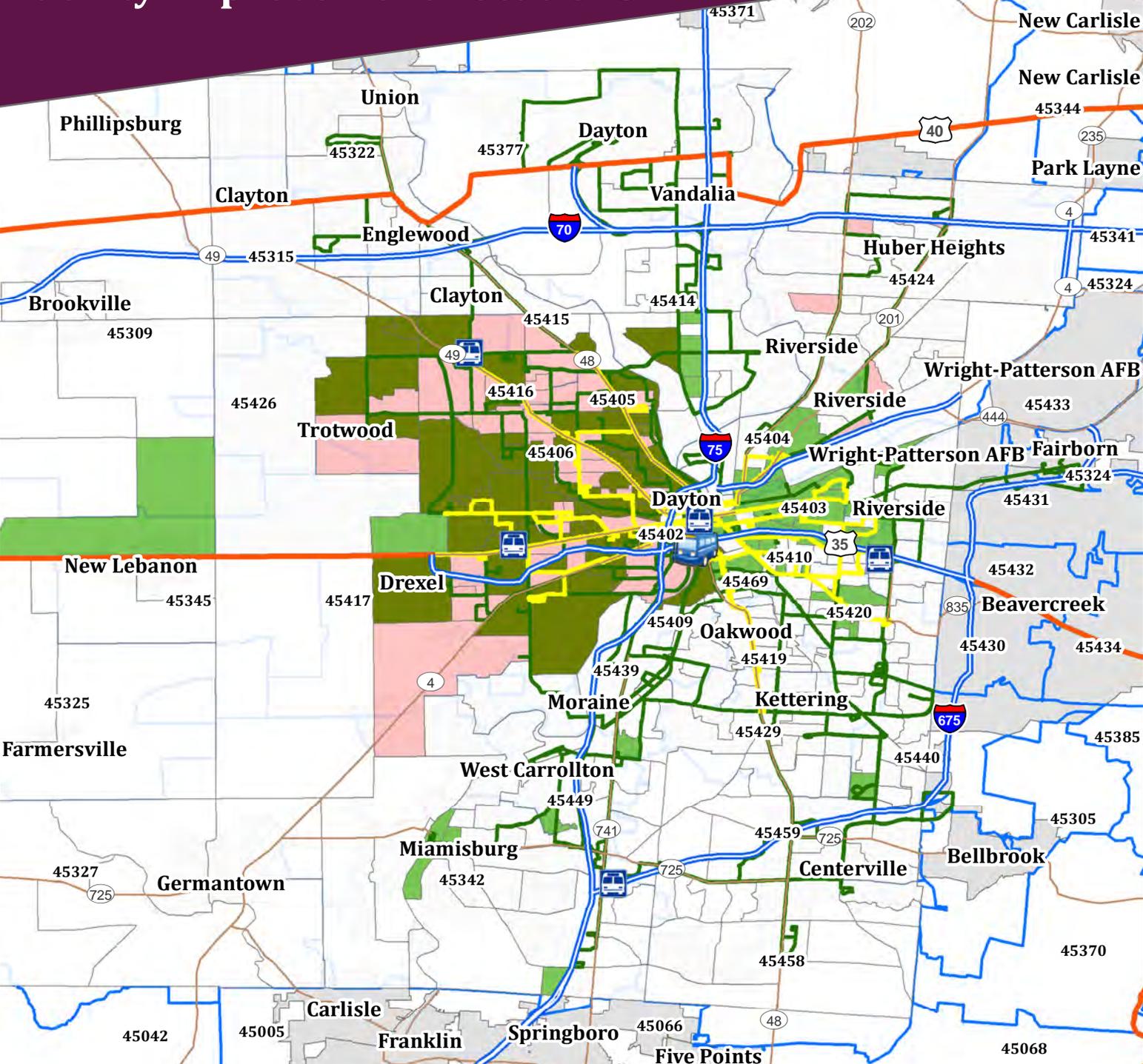


- Lighting
  - Shelter
  - Garbage
  - Bench
  - RTA Hubs
  - RTA Facilities (includes substations)
  - Limited Access
  - Highway
  - Major Road
  - Trolley Lines
  - Routes
- Significant Low-Income**
- 0% - 16.2%
  - 16.3% - 84.6%
- Significant Minority**
- 0% - 31.1%
  - 31.2% - 100%
- Significant Minority & Low-Income**
- Significant Minority & Low-Income
  - Places



# Exhibit 45: RTA Recent Amenity & Facility Improvement Locations

## Greater Dayton RTA Title VI Analysis



**Improved Facilities**

**Facility Type**

- RTA Facility
- Transit Hub
- Limited Access
- Highway
- Major Road
- Trolley Lines
- Routes

**Significant Low-Income**

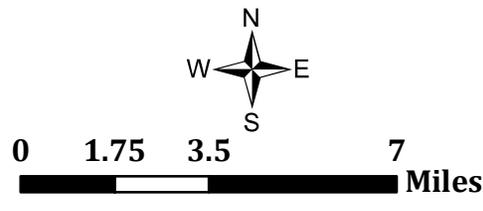
- 0% - 16.2%
- 16.3% - 84.6%

**Significant Minority**

- 0% - 31.1%
- 31.2% - 100%
- Significant Minority & Low-Income

**Other Symbols**

- Zip Codes
- Places



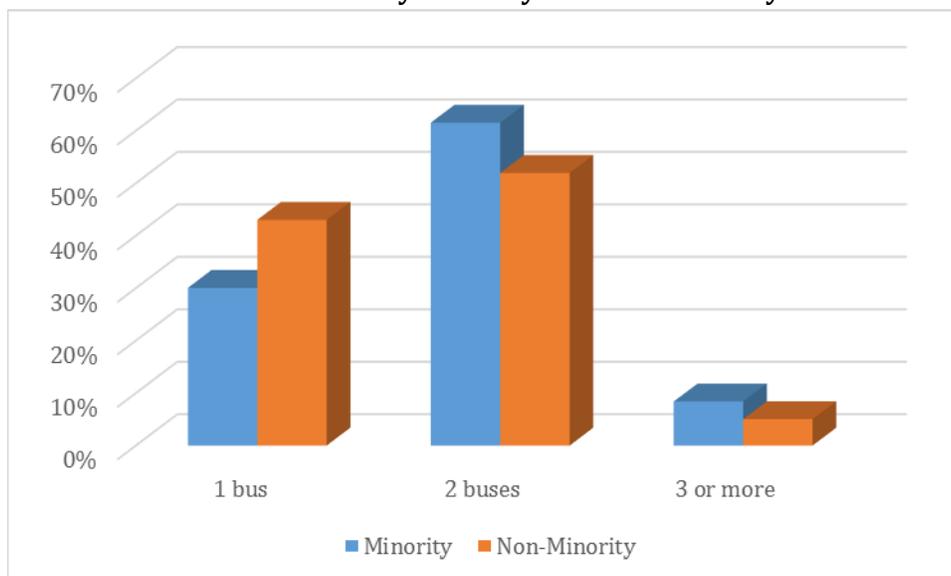
## **Survey Results, Minority Routes vs. Non-Minority Routes**

Survey results were broken up into minority routes or non-minority routes. The following graphs compare the results of certain questions from passengers riding on predominantly minority or non-minority routes to represent any inequalities in transit services.

### **Transfers**

Passengers were asked how many separate buses they would have to take to get to their destination. The results show passengers on minority routes were more likely to make a transfer as compared to passengers on non-minority routes. This coincides with the results in Exhibit 28 when comparing minority and non-minority riders. Exhibit 46 gives a visual representation of the results.

**Exhibit 46: Transfers by Minority and Non-Minority Routes**

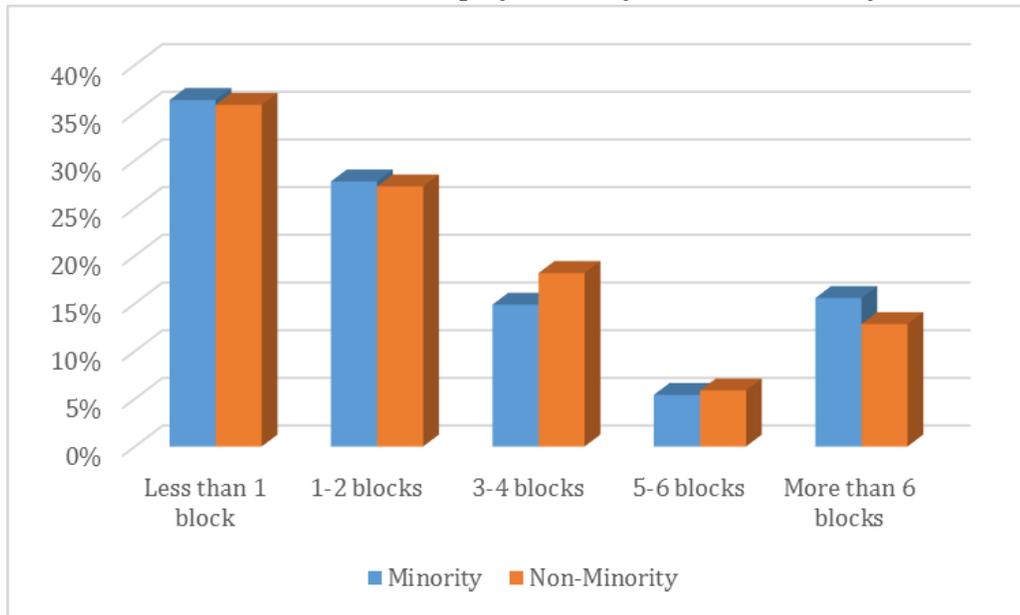


Source: RLS & Associates, Inc. Surveys: October – December 2019

### **Distance to Bus Stop**

Exhibit 47 depicts the distance traveled to the bus stop by RTA passengers. When comparing distances walked to reach the bus stop, minority and non-minority route riders had similar distances to walk with walking 3 or more blocks. Slightly more minority route riders had to walk less than one block (1.5 percent more), while more non-minority route riders had to walk 3-4 blocks (3.3 percent more).

**Exhibit 47: Distance to Bus Stop by Minority and Non-Minority Routes**

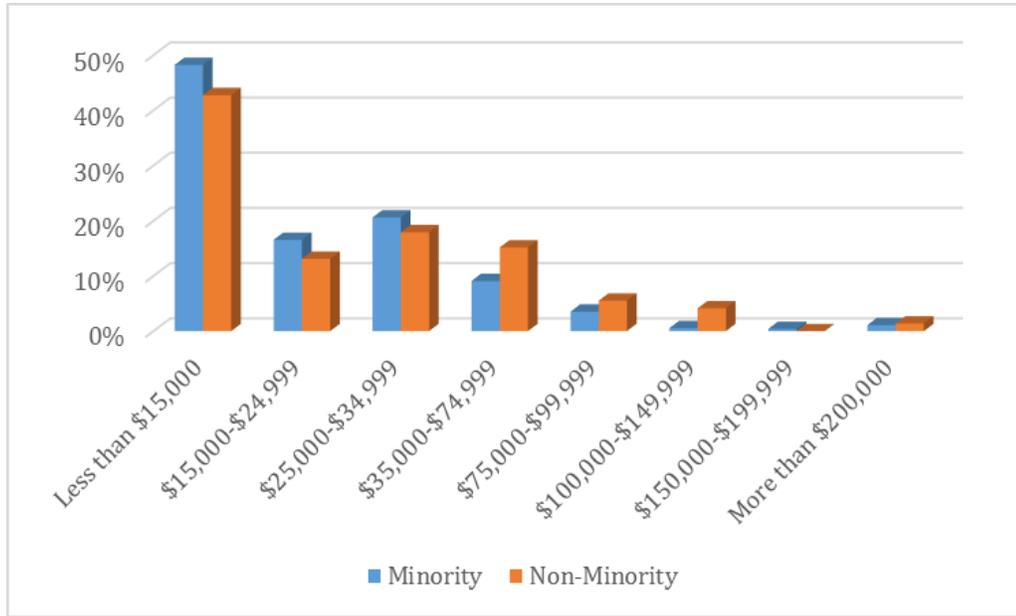


Source: RLS & Associates, Inc. Surveys: October – December 2019

**Income Level**

RTA passengers were asked what their household annual income was for the past year. Exhibit 48 compares the income levels of minority and non-minority route passengers. More minority route riders stated their household income was less than \$15,000 (48.2 percent) as compared to non-minority route riders (42.8 percent). The remaining income level categories were similar for both minority and non-minority route riders.

**Exhibit 48: Income Level by Minority and Non-Minority Routes**

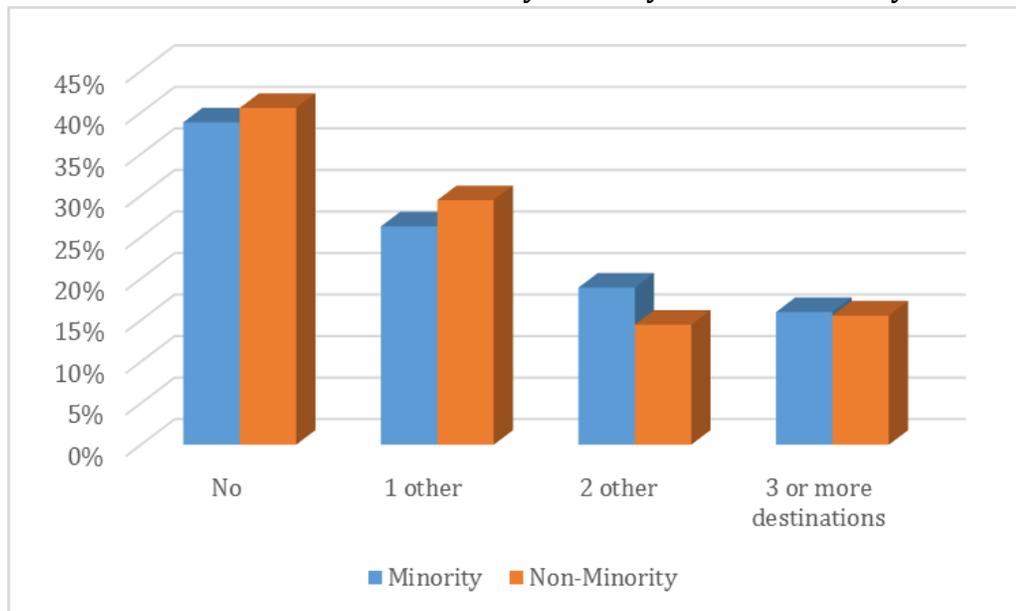


Source: RLS & Associates, Inc. Surveys: October – December 2019

**Number of Destinations**

Exhibit 49 depicts the riders who were going to use RTA for trips other than the one for which they were surveyed. Non-minority bus route riders were more likely to be using the bus for only the surveyed trip than minority route riders. Minority riders were slightly more likely to be going to two (2) or more destinations during the day they were surveyed.

**Exhibit 49: Number of Destinations by Minority and Non-Minority Routes**

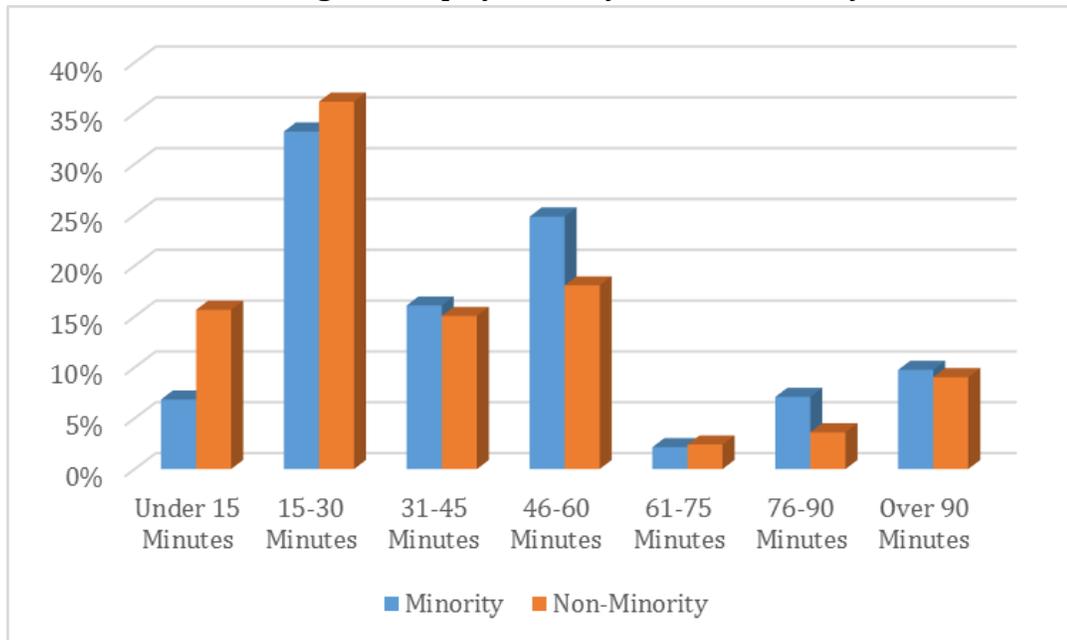


Source: RLS & Associates, Inc. Surveys: October – December 2019

### **Length of Trip**

Passengers were asked how long their entire trip took from leaving the house to arriving at their destination. Exhibit 50 shows how minority and non-minority route riders responded. Non-minority route riders (36.1 percent) were more likely to take 15 to 30 minutes as compared to minority route riders (33.2 percent). Minority route riders were more likely to take 46 to 60 minutes compared to non-minority route riders.

**Exhibit 50: Length of Trip by Minority and Non-Minority Routes**

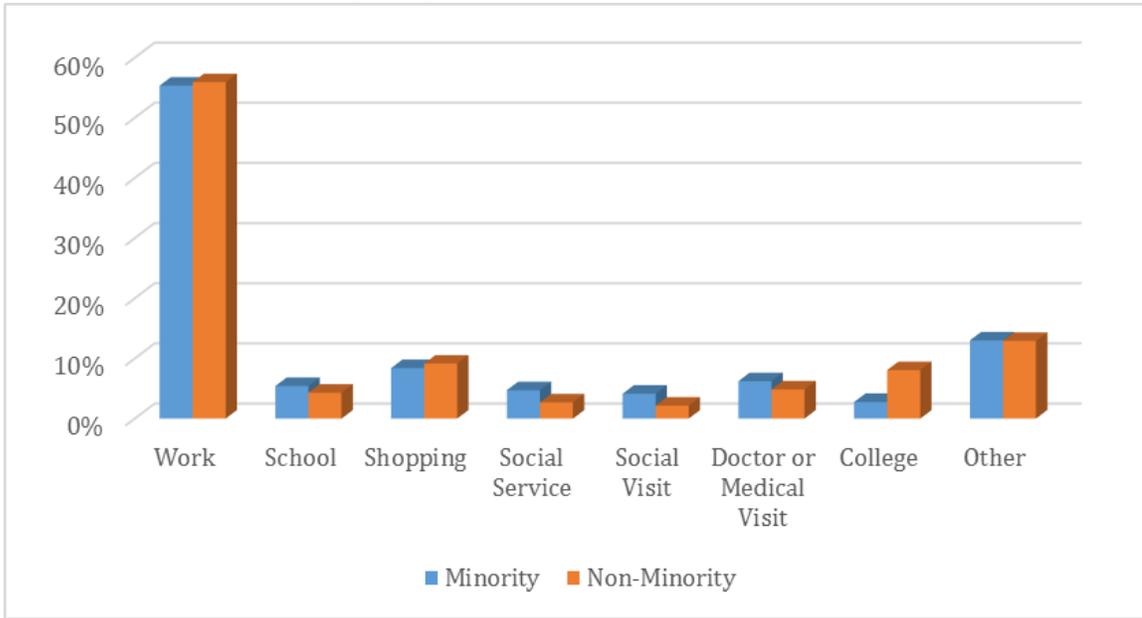


Source: RLS & Associates, Inc. Surveys: October – December 2019

### **Trip Purpose**

Riders on minority and non-minority routes had similar, but slightly different purposes when riding the bus. Work was the highest trip purpose between both types of routes with non-minority routes having a slightly higher percentage of riders going to work. Minority route riders were also slightly more likely to be going to doctor or medical visits than non-minority route riders. Exhibit 51 below depicts trip purpose by route type.

**Exhibit 51: Trip Purpose by Minority and Non-Minority Routes**

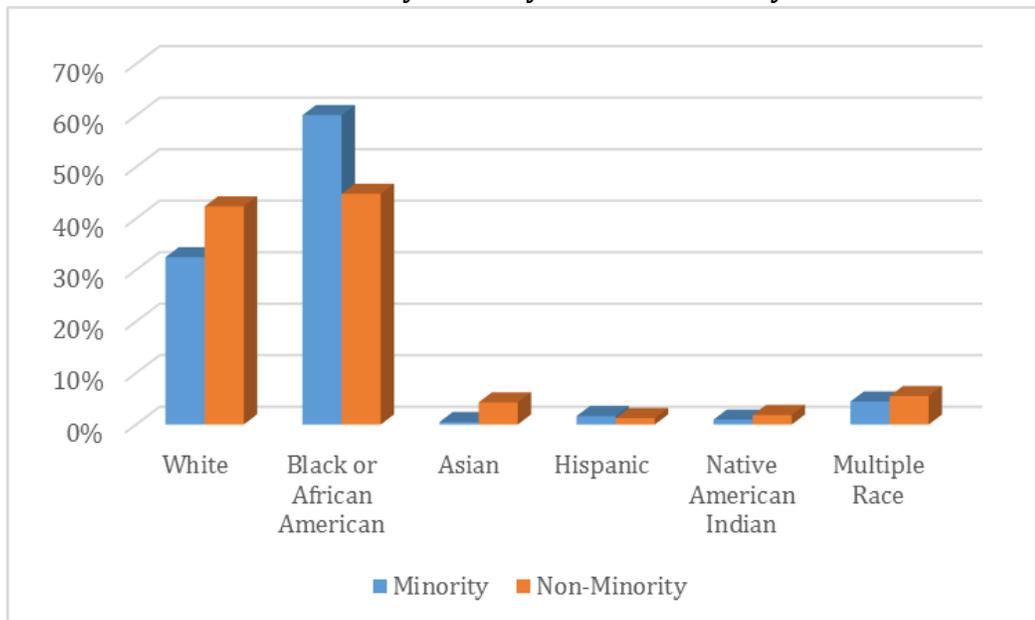


Source: RLS & Associates, Inc. Surveys: October – December 2019

**Race**

Exhibit 52 depicts the racial breakdown for minority and non-minority routes. Minority populations make up 67.5 percent of minority route survey respondents. The majority of minority riders on minority routes were African American/Black (60.1 percent). Non-minority populations made up 42.3 percent of non-minority route survey respondents.

**Exhibit 52: Race by Minority and Non-Minority Routes**

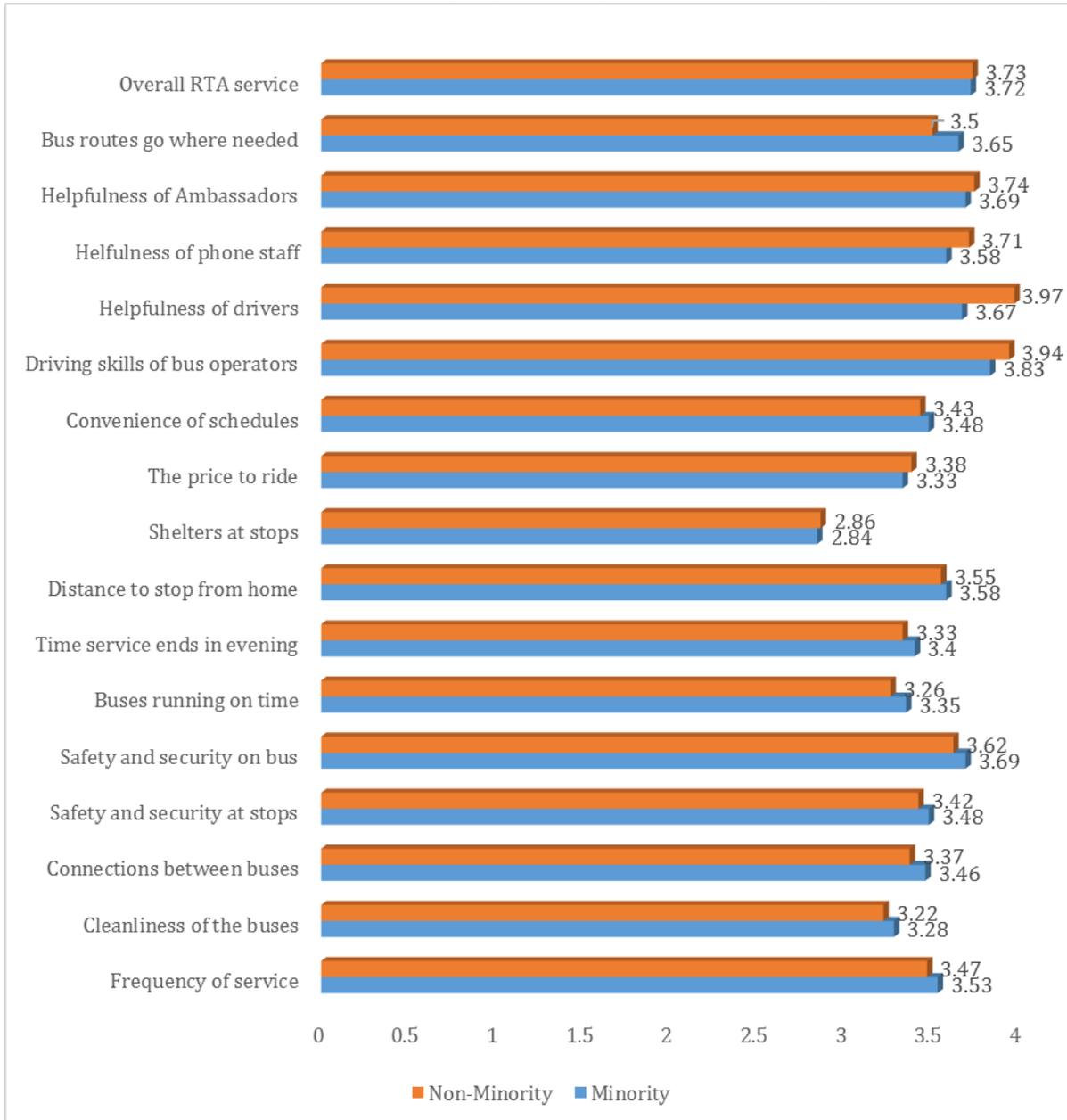


Source: RLS & Associates, Inc. Surveys: October – December 2019

**Service Ratings**

Surveyed passengers were asked to rate 17 different RTA services on a scale of 1 (needs improvement) to 5 (very good). These results were then broken up into minority and non-minority routes. The highest rated service for minority route riders was driving skills of bus operators and the highest rated service for non-minority route riders was helpfulness of drivers. Both minority and non-minority route riders felt shelters at stops needed the most improvement. Exhibit 53 shows the average rating for each of the different services.

**Exhibit 53: Service Ratings by Minority and Non-Minority Routes**



Source: RLS & Associates, Inc. Surveys: October – December 2019

## MONITORING OF RTA SERVICE STANDARDS

Per the scope of work provided by RTA, RLS compared each of RTA's minority and non-minority routes against RTA's service standards and policies by service mode. Survey results and RTA data are broken down by service mode and minority or non-minority route in the following paragraphs and exhibits.

### Frequency of Service

Exhibit 54 depicts the average rating by service mode for minority and non-minority route passengers. Based on the respondents perceived frequency of service, minority crosstown service riders felt the frequency of service was well below average. Given the nature of the service being provided, and budget constraints, these low ratings are to be expected. Minority feeder route passengers rated frequency of service the highest. This could be attributed to the fact that minority feeder routes are geared towards seniors who are less likely to have other transportation options and therefore may place a higher degree of value on service provided by the RTA.

**Exhibit 54: Frequency of Service**

Type of Service	Average Rating
Overall	3.49
Minority Routes	3.50
Local (1, 2, 4, 7, 8, 9, 12, 22)	3.57
Suburban (14, 16, 18, 19)	3.47
Crosstown (24, 34)	3.43
Feeder (64, 65)	4.67
Non-Minority Routes	3.50
Local (3, 5)	3.50
Suburban (11, 17)	3.36
Crosstown (23)	3.83
Express (43, X5)	3.00
Circulator (Flyer)	4.10
Feeder (66)	5.00

Source: RLS & Associates, Inc. Surveys: October – December 2019

Exhibit 55 is a breakdown by service mode of vehicle headways. The longer headway times for minority routes can be attributed to the lack of minority express routes. The only express routes are considered non-minority routes and have much lower headways, making the non-minority headways lower overall than minority headways. Headway information is not available for most minority and non-minority feeder routes because only one, two, or three trips are run per time period.

### Exhibit 55: Vehicle Headways

Type of Service	Average Weekday Headways				Average Saturday Headways		Average Sunday Headways	
	AM Peak	Base	PM Peak	Night	Base	Night	Base	Night
Overall	27	37.5	27.5	73.4	63.4	75.3	75.5	83
+/-20% Variance	21.6 - 32.4	30 - 45	22 - 33	58.7 - 88	50.7 - 76.1	60.3 - 90.4	60.4 - 90.6	66.4 - 99.6
Minority Routes	26.9	39.4	29.6	79.3	63.6	81.8	79.6	82.3
Local (1, 2, 4, 7, 8, 9, 12, 22)	24.1	32.3	24.8	75	42.5	75	70	75
Suburban (14, 16, 18, 19)	35	65	35	100	100	100	100	100
Crosstown (24, 34)	47.5	55	52.5	55	75	72.5	72.5	72.5
Feeder (64, 65)	1	1	1	N/A	N/A	N/A	N/A	N/A
Non-Minority Routes	27.1	33.6	23.9	59.5	68.7	57.2	57.7	87.5
Local (3, 5)	1	1	1	N/A	N/A	N/A	N/A	N/A
Suburban (11, 17)	47.5	62.5	47.5	100	100	100	100	100
Crosstown (23)	70	70	70	70	N/A	N/A	N/A	N/A
Express (43, X5)	33	31	18.5	38.5	25.5	38	36.5	75
Circulator (Flyer)	10	10	10	10	N/A	10	N/A	N/A
Feeder (66)	1	1	1	N/A	N/A	N/A	N/A	N/A

(Averages are in Minutes)

Source: GDRTA, 2019

### **Vehicle Load**

Exhibit 56 depicts the average load factor for minority and non-minority routes, according to the RTA's data on routes from September 2019. Percentages shown in the exhibit reflect the average amount of seats filled for the given time frame. On average, minority routes have higher load factors than non-minority routes. However, non-minority routes do fall outside of the +/-20% variance used for disparate impact.

### Exhibit 56: Average Vehicle Load Factor

Type of Service	Average Load Factor
System (2019)	62.77%
+/-20% Variance	50.22% - 75.33%
Minority Routes	70.99%
Non-Minority Routes	48.16%

Source: GDRTA, 2019

## **Transfers**

Exhibit 57 depicts the average rating by service mode for minority and non-minority route passengers making connections between buses (transfers). Based on the respondents perceived ability to transfer to other buses, non-minority suburban service riders rated the connections between buses was well below average. Suburban services on non-minority routes have the longest wait between buses. Minority and non-minority feeder route passengers rated frequency of service the highest. This could be attributed to the fact that feeder routes passengers do not make as many transfers as other passengers surveyed.

**Exhibit 57: Connections Between Buses**

<b>Type of Service</b>	<b>Average Rating</b>
Overall	3.45
Minority Routes	3.46
Local (1, 2, 4, 7, 8, 9, 12, 22)	3.68
Suburban (14, 16, 18, 19)	3.47
Crosstown (24, 34)	3.31
Feeder (64, 65)	4.33
Non-Minority Routes	3.37
Local (3, 5)	3.50
Suburban (11, 17)	3.16
Crosstown (23)	3.67
Express (43, X5)	3.23
Circulator (Flyer)	4.13
Feeder (66)	5.00

Source: RLS & Associates, Inc. Surveys: October – December 2019

Exhibit 58 represents the average number of buses needed for survey respondents to get their destination. Passengers of the Flyer needed the least number of buses to get to their destination, while non-minority feeder route passengers, on average, had to take the highest number of buses to reach their destination (2.00 buses). The high number of buses needed on route 66 can be attributed to low survey results.

**Exhibit 58: How Many Separate Buses Needed**

<b>Type of Service</b>	<b>Average # of Buses</b>
Overall	1.75
+/-20% Variance	1.40 - 2.11
Minority Routes	1.78
Local (1, 2, 4, 7, 8, 9, 12, 22)	1.81
Suburban (14, 16, 18, 19)	1.67
Crosstown (24, 34)	1.82
Feeder (64, 65)	1.75
Non-Minority Routes	1.62
Local (3, 5)	1.50
Suburban (11, 17)	1.62
Crosstown (23)	1.67
Express (43, X5)	1.75
Circulator (Flyer)	1.20
Feeder (66)	2.00

Source: RLS & Associates, Inc. Surveys: October – December 2019

**On-Time Performance**

Survey respondents were asked to rate buses running on time. Non-minority local bus route passengers’ average rating for buses running on time was 2.50. Non-minority Crosstown and Feeder route passengers were highly satisfied with on-time performance and rated service with an average score of 3.95 and 5.00 respectively. Exhibit 59 below depicts the average rating for on-time performance by service mode.

**Exhibit 59: Buses Running On Time**

<b>Type of Service</b>	<b>Average Rating</b>
Overall	3.34
<b>Minority Routes</b>	<b>3.25</b>
Local (1, 2, 4, 7, 8, 9, 12, 22)	3.37
Suburban (14, 16, 18, 19)	3.30
Crosstown (24, 34)	3.44
Feeder (64, 65)	3.67
<b>Non-Minority Routes</b>	<b>3.26</b>
Local (3, 5)	2.50
Suburban (11, 17)	3.03
Crosstown (23)	4.17
Express (43, X5)	3.38
Circulator (Flyer)	3.88
Feeder (66)	5.00

Source: RLS & Associates, Inc. Surveys: October - December 2019

Exhibit 60 represents RTA routes on-time performance by service mode. The overall on-time performance for RTA routes from September - December 2019 was 78.49 percent. Non-minority routes had a slightly higher on-time performance with less late arrivals as compared to minority routes. Minority feeder routes (Routes 64 and 65) had the lowest on-time performance of all minority routes, at 49.6 percent, while non-minority feeder routes (66) had the lowest for non-minority routes, at 51.1 percent.

**Exhibit 60: Percent On-Time**

Type of Service	Average Percent On-Time		
	Early	On-Time	Late
Overall	5%	78.49%	16.51%
+/-20% Variance	4% - 6%	94.19% - 62.79%	19.81% - 13.21%
Minority Routes	4.96%	78.52%	16.51%
Local (1, 2, 4, 7, 8, 9, 12, 22)	3.78%	82.36%	13.85%
Suburban (14, 16, 18, 19)	3.20%	80.68%	16.13%
Crosstown (24, 34)	2.65%	87.75%	9.55%
Feeder (64, 65)	15.55%	49.60%	34.85%
Non-Minority Routes	5.30%	81.66%	13.03%
Local (3, 5)	5.85%	85.55%	8.60%
Suburban (11, 17)	2.80%	86.55%	10.65%
Crosstown (23)	2.20%	86.40%	11.30%
Express (43, X5)	4.05%	82.10%	13.85%
Circulator (Flyer)	1.80%	89.00%	9.20%
Feeder (66)	18.30%	51.10%	30.60%

Source: GDRTA, 2019

## CONCLUSION

Shelters at stops (lack thereof and condition of) had the lowest rating from both minority and non-minority route riders. The ratings may be low, but based on the amenities shown in Exhibit 44, and the improvements planned in Exhibit 45, RTA is working to remedy the issues surrounding bus shelters.

Another low rated category was buses running on time. Non-minority local route passengers rated buses running on time the lowest category surveyed by a significant margin as compared to the other service modes. Non-minority local routes (Routes 3 and 5) should be analyzed for opportunities to improve on-time performance as well as non-minority suburban routes (11 and 17). While these two service mode types had on-time performance rated significantly lower than other categories, these two modes had overall on-time performances higher than the RTA system-wide average on-time percentage of 78.49 percent.

Survey analysis showed that almost 70 percent of minority route passengers had to take two or more buses to get to their final destination during their surveyed trip. This was over ten percent higher than the percent of non-minority route passengers who had to take two or more buses during their surveyed trip (57 percent). However, when rating RTA services, minority route passengers rated relevant categories, such as 'bus routes going where needed' and 'connections between buses', higher than those who were non-minority route passengers.

Following the completion of the analysis/review of the passenger surveys and RTA's policies and procedures, RLS determined that RTA offers equitable service to all populations, specifically including minority, non-minority, LEP, and low-income populations. This service is offered without regard to race, color, or national origin and is, therefore, in compliance with the Title VI and Environmental Justice regulations.



<b>Type:</b> Policy	<b>Number:</b> 1
<b>Department:</b> Customer and Business Development	
<b>Focus:</b> Customer Amenity Program	
<b>Document History</b> Approved: 9/2/1999 Effective: 9/2/1999 Revisions: 4/2/1996, 9/2/1999, 6/15/2008, 7/1/2008, 9/4/2008, 9/3/2013, 8/1/2017	<b>Pages:</b> 1 of 2
<b>Chief Executive Officer Signature:</b> 	<b>Date:</b> 8/1/2017

#### GENERAL DESCRIPTION

The Greater Dayton Regional Transit Authority (RTA) recognizes the importance of customer amenities in providing comfortable and quality service to system users as well as attracting new riders. This program will place shelters, benches, trash receptacles, schedule holders, concrete pads, bus pads and bus stop signs at bus stops. RTA will maintain an accurate inventory of all passenger amenities.

#### POLICY STATEMENT

Periodically, the RTA will evaluate its amenity program for the acquisition and placement of amenities. Funding, actual ridership counts and operational characteristics at bus stops will be used in determining the appropriate amenity. Amenities will be placed according to the following criteria.

**Bus Signage:** Each bus stop will be clearly marked with a bus stop sign. Most signs display the route number(s) and name of route(s), which serve that bus stop.

**Concrete Pads:** Bus stops which have boardings of (20) or more passengers per day can be provided with a concrete pad.

**Benches:** Bus stops which have boardings of (20) or more passengers per day can be provided with a bench. Benches will only be placed on existing concrete pads or in conjunction with the installation of a new pad.

**Shelters:** Bus stops that have boardings of (40) or more passengers per day can be provided an open shelter. If an enclosed shelter is desired, the request must be submitted by a political jurisdiction through the Community Grants Program.

Trash Receptacles: Bus stops that have a RTA shelter will be provided with a trash receptacle. At bus stops without a shelter, a trash receptacle will be installed if a request has been made, the bus stop has boardings of (20) or more passengers per day and, the jurisdiction, business, or property owner agrees to empty the receptacle weekly. RTA Planning Department will document new agreements for emptying trash receptacles.

Bus Pads: New layover locations will be inspected for any necessary concrete bus support, dependent upon the conditions and layout of the roadbed, which it will operate.

Schedule Information: Bus stops where it is deemed necessary to provide clearer scheduling information, may be eligible for a schedule holder, system map, or digital sign equipment

Lighting: Bus stops that do not provide adequate lighting will be programmed for a solar light at locations where physically possible to place.

Park-n-Rides: RTA will seek locations along RTA routes where RTA customers can park their automobiles and conveniently board a bus.

Special Considerations: In placing or relocating customer amenities, the following will also be given consideration: traffic patterns affecting vehicle operations and/or public safety, the location of other near-by amenities, the affect on cost of maintaining amenities, RTA identity in rural areas, the span of time between buses (frequency of service), and local ordinances or regulations governing the location and placement of amenities.

Special consideration for additional amenities will be given to bus stops located near senior housing, senior centers, independent/assisted living centers, hospitals or other senior/health-related facilities. New transit-friendly developments where ridership is expected but not as yet determined will also receive the same consideration.

The placement of amenities will be distributed equitably across the system to ensure Title VI requirements are met. An analysis of the placement of amenities will take place at least every three years and will be implemented by mapping existing and planned amenities and facilities to evaluate equal distribution. The maps will be included as part of RTA's Title VI Program.

### PROGRAM CRITERIA

To effectively implement the RTA Amenity Program program, ridership counts and operational characteristics at bus stops will be monitored to determine which stops warrant shelters, benches, and other amenities. The Executive Director reserves the right to determine the placement of customer amenities beyond this program upon rational examination of the benefits to the community and/or RTA operations. It will be the goal of the RTA to provide amenities to the riding public wherever possible, within the Board-approved budget and operating policies of the RTA. In addition, the RTA will continue to encourage participation in the annual RTA Community Grant Program. This program awards approximately \$200,000 per year for jurisdictions within the RTA service area for transit-related improvements, including customer amenities, over and beyond those, which the RTA can provide.



<b>Type:</b> Policy	<b>Number:</b> 2
<b>Department:</b> Customer and Business Development	
<b>Focus:</b> Major Service and Fare Change	
<b>Document History</b> Approved: 9/2/2013 Effective: 9/2/2013 Revisions: 8/19/2019	<b>Pages:</b> 1 of 3
<b>Chief Executive Officer Signature:</b> 	<b>Date:</b> 8/19/2019

### **GENERAL DESCRIPTION**

In compliance with applicable Federal Requirements under Title VI of the Civil Rights Act of 1964, including 49 CFR Section 21 and FTA Circular C 4702.1B, the RTA's is updating its definition of a major service and fare change to is a Board of Trustees approved policy. from the previous public hearing practice in the Planning Service Standards Manual. The major service and fare change policy will be used to determine what constitutes a major service change or fare change, and qualifies for a service equity analysis. The RTA will follow the Public Outreach and Participation Process when these occur. All completed analyses will be placed in the Title VI program and submitted to the FTA every three years.

### **POLICY STATEMENT**

A major change of service or fare is defined as:

- Any change in service (adding or reducing) resulting in a 25 percent or greater change in the number of transit miles;
- Any change in service resulting in a 25 percent or greater change in the number of transit revenue vehicle miles of a route computed on a daily basis for the day of the week for which the change is made;
- The accumulation of changes on a route in a fiscal year adding up to 25 percent;
- Any headway adjustments of 5 minutes or more during peak hour service and 15 minutes or more during non-peak hour service;
- A temporary addition of service of less than 12 months qualifies for an exemption but will be required to undergo a service equity analysis after this time if it meets the definition of a major service change; and
- Any fare change increase.

The Chief Customer and Business Development Officer will be responsible for ensuring compliance with this policy.

## **Public Outreach and Participation Process**

The Greater Dayton RTA complies with Federal Transit Law 49 United States Code (USC) Chapter 53, Section 5307 (d)(1)(I) by developing a locally written process for soliciting and considering public comment before raising a fare or carrying out a major service reduction. In addition, the following public outreach and participation plan meets the requirements of U.S. DOT Order 5610.2(a), Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, FTA C 4703.1 Environmental Justice.

The RTA employs several means to communicate to the general public regarding the activities it performs including LEP (limited-English proficient) and minority populations. The communication activities may focus in different mediums depending on the program or population affected. These include but are not limited to:

### **Public Information and Notifications**

RTA publishes notices, brochures and tables regarding RTA proposals or programs, including how the public can obtain information and make comments, where meetings are to take place, and other applicable information. The notices for public input are posted 30 days in advance so the public has time to consider proposals and make comments. The notice methods include:

- Press releases to local and state media
- Customer newsletters (print and email)
- E-mail blasts and alerts via text or e-mail
- Website links and articles
- On bus advertising with interior cards, exterior bus banners, onboard enunciator, and TV monitors on partial bus fleet
- Rack cards/"take ones" placed on the bus and racks throughout RTA transit centers
- Transit Center posters and brochures
- Spanish translation services and translated materials including fare media signs, day and family pass rack cards, system map information, bus hailer kits, translation assistance cards, critical notifications and forms such as Title VI notice and application forms
- Radio, television or newspaper ads considering stations and publications that serve LEP and minority populations

### **Meeting Locations**

RTA meets with the public in locations that have convenient access to transit and are centrally located so that anyone in its service area can attend meetings and receive information about any RTA activities that will impact them, especially LEP and minority populations. Meetings are held at several different times of the day for easier access. All public meeting locations will be accessible to those with disabilities. If notified five (5) days prior to the meeting, language or hearing interpreters will be made available.

## **Public Meeting Forums**

On critical issues such as major service changes and all fare changes, RTA conducts public meetings that utilize one-on-one interviews with customers. RTA staff will prepare proposals in sufficient detail and make available prior to the meeting for interested individuals. If the proposal involves service changes, maps are made available. Since each customer can be affected differently than another customer, obtaining comments this way allows for an individualized response to an individual need. RTA staff will conduct personal interviews and transcribe oral comments if written comments are not possible. Meetings will have sign-up sheets available and if no one is in attendance, staff will wait for 10 minutes and then announce the reason for the meeting, a statement that no one is in attendance and close the meeting. Customers are also able to leave audio messages on an advertised phone number prior to the advertised deadline for public feedback and the comments are transcribed for RTA's analysis along with all public feedback received. The public comments are presented at Board of Trustee Committee meetings so that they are part of the decision making process.

## **Priority Boards**

Dayton's priority board system links representatives from each sector within city limits to City Hall. To keep the priority boards informed, RTA's planning staff members attend meetings to discuss ongoing activities and future plans. These visits also provide opportunities for neighborhood groups to provide feedback and share concerns they may have about RTA.

## **Website**

RTA's website provides round-the-clock information on the transit system, including fare structures, route schedules and maps. Any changes in service, such as weather anomalies, traffic reroutes, or holiday hours, are made available on the site. RTA press releases and customer newsletters are published on the site. The site has Google Translation software for on demand translation to Spanish. RSS messages can be sent to customer phones for immediate service alerts when they sign-up for the service.

Customers also may apply on line to become a member of RTA's Customer Advocacy Group, which reports directly to the RTA Management staff. This council is representative of both minority and non-minority groups.

## **Community Events**

RTA staff members regularly participate in community events that are not specific to public transit such as ethnic festivals, arts and music events, or events that promote a specific community or district. RTA staffers man a display booth and provide information on public transit activities and review customer feedback.

### **Wright Stop Plaza**

When RTA wants to advise the public of specific projects that will have a direct impact on riders, RTA staff will conduct personal interviews at the major downtown transit center and transcribe oral comments or assist customers with computer surveys to receive customer input.

### **Outreach to Community Groups**

The RTA meets with community groups such as LEAD (Leadership for Equality and Action in Dayton) and social service agencies to listen to community concerns on the effects of fare changes to low income and minority populations. RTA has associations with the Latino Family Advocacy Program at East End Community Services (EECS), Sinclair Community College, WSU, Montgomery County, and the City of Dayton, all of which assist LEP persons.

### **Jurisdictional Meetings**

RTA conducts an extensive outreach program with jurisdictions and throughout its service area. Over 30 Meetings annual are conducted to gather meaningful feedback on current transit needs issues, offer information about the services RTA provides, and enhance relationships with our stakeholders.



<b>Type:</b> Policy	<b>Number:</b> 3
<b>Department:</b> Customer and Business Development	
<b>Focus:</b> Vehicle Assignment	
<b>Document History</b> Approved: 9/3/2013 Effective: 9/3/2013 Revisions 8/8/2017	<b>Pages:</b> 1 of 1
<b>Chief Executive Officer Signature:</b> 	<b>Date:</b> 8/8/2017

**VEHICLE ASSIGNMENT  
RTA OPERATING POLICY**

**GENERAL DESCRIPTION**

In compliance with applicable Federal Requirements under Title VI of the Civil Rights Act of 1964, including 49 CFR Section 21 and FTA Circular FTA C 4702.1B, the Greater Dayton RTA is updating its vehicle assignment process to a Board of Trustees approved policy and amending the process to include the assignment of APC vehicles. The policy will ensure that vehicles are assigned in an equitable manner without regard to race, color or national origin.

**POLICY STATEMENT**

1. RTA assigns vehicles randomly every day to ensure a fair and equitable distribution of vehicles throughout the service area.
2. When assigning vehicles, RTA takes into consideration routes that have higher ridership, specific needs and the topography that limits the use of certain size vehicles.
3. As RTA is one of the fewest transit systems that have a fleet of electric trolley buses, some routes are limited to this vehicle mode except in situations that might interfere with their operation.

The Directors of Customer and Business Development and Maintenance will be responsible for ensuring compliance with this policy.



<b>Type:</b> Policy	<b>Number:</b> 4
<b>Department:</b> Customer and Business Development	
<b>Focus:</b> Disparate Impact Policy	
<b>Document History</b> Approved: 9/3/2013 Effective: 9/3/2013 Revisions: 8/8/2017	<b>Pages:</b> 1 of 3
<b>Chief Executive Officer Signature:</b> 	<b>Date:</b> 8/8/2017

### GENERAL DESCRIPTION

In compliance with applicable Federal Requirements under Title VI of the Civil Rights Act of 1964, including 49 CFR Section 21 and FTA Circular FTA C 4702.1B, the RTA is establishing a Disparate Impact Policy. The Federal Transit Administration (FTA) requires that recipients of FTA funding prepare and submit service equity analyses for proposed major service changes (defined in the RTA's Major Service Change Policy). The purpose of this policy is to establish a threshold which identifies when adverse effects of major service change are borne disproportionately by minority populations.

FTA Circular 4702.1B, defines Disparate Impact as "a neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin".

### POLICY STATEMENT

RTA has established its disparate impact threshold to be at the statistically significant level of 20 percent or greater of the population that could possibly be affected by the service or fare change. Therefore, should the impact of any major service change require a minority population to bear adverse effects of 20 percent or greater than those adverse effects borne by the non-minority population; that impact will be deemed disparate. Justification for the selected comparison population will be provided in each individual scenario. The threshold will be applied uniformly to all modes of service operated by the RTA.

The Disparate Impact Policy applies to RTA service standards established for all modes of service. Those standards include the following:

- Vehicle Load;
- Vehicle Headway (Frequency);
- Route Directness;
- Route Variations;
- Transfers;
- On-time Performance; and,
- Service Availability.

The procedure for monitoring disparate impact is described in the RTA Monitoring Plan. If the RTA finds a disparate impact when applying the 20 percent threshold to the cumulative proposed changes, it will consider modifying the proposed changes in order to avoid, minimize, or mitigate the disparate impacts of the proposed changes. RTA will exercise the same threshold and procedures to reanalyze the modified proposed changes to determine whether the modifications actually removed the potential disparate impacts of the changes.

If RTA does not alter the proposed service changes despite the potential disparate impact on minority populations, or if it finds, even after the revisions, that minority riders will continue to bear a disproportionate share of the proposed service change, RTA will implement the service change only if the following criteria apply:

There is a substantial legitimate justification for the proposed service change, and RTA can show that, after examining alternatives, there are no alternatives that would have a less disparate impact on minority riders but would still accomplish the legitimate program goals.

**Resources for Comparison of Service or Fare Changes**

RTA will include a justification for the selected comparison population of people in the protected class that could be adversely affected by the service or fare change and the proportion of people not in the protected class. The selected populations will be based on the intended service or fare change. The following matrix outlines the comparison populations to be applied by service or fare change option.

*Table 1: Comparison Population by Service or Fare Change*

<b>Service Changes</b>	<b>Comparison of Ridership of Affected Route and System-wide Ridership</b>	<b>Comparison of Population of the Service Area and the Census Block Groups, Zip Code, or TAZ Served by the Affected Routes</b>
Headway Changes	Yes	No
Eliminating a Route	Yes	Yes
Increasing Service to Existing Service Area	Yes	No
New Service or Service Expansion	No	Yes
Fare Change	Yes	No

## **Comparison for Multiple Service or Fare Changes**

RTA will use one comparison population (either ridership or population) when proposing major service changes that involve more than one of the categories noted in Table 1. RTA will use a comparison of ridership from minority, non-minority, and low-income riders for proposed changes that would increase or decrease fares on the entire system, or on certain modes, or by fare payment or fare media.

When ridership data is utilized for comparison, RTA will analyze any available information generated from surveys to determine the minority and non-minority population ridership of the affected route(s) and the minority and non-minority ridership of the entire system.

When adequate ridership data is not available, or if RTA is uncertain as to which population to use for comparison purposes, RTA will contact the FTA regional office for technical assistance.

## **Public Comment Opportunity**

RTA shall provide a meaningful opportunity for public comment on any proposed mitigation measures, including less discriminatory alternatives that may be available. The public comment or Public Hearing Process is defined in the RTA Public Engagement Process.

The Director of Planning/Marketing will be responsible for ensuring compliance with this policy.



<b>Type:</b> Policy	<b>Number:</b> 5
<b>Department:</b> Customer and Business Development	
<b>Focus:</b> Environmental Justice Disproportionate Burden	
<b>Document History</b> Approved: 9/3/2013 Effective: 9/3/2013 Revisions: 8/8/2017	<b>Pages:</b> 1 of 2
<b>Chief Executive Officer Signature:</b> 	<b>Date:</b> 8/8/2017

### GENERAL DESCRIPTION

The RTA establishes this Disproportionate Burden Policy in compliance with applicable Federal Environmental Justice requirements under Executive Order 12898 and FTA Circular 4702.1B. The Federal Transit Administration (FTA) requires that recipients of FTA funding evaluate proposed major service changes to determine whether low-income populations will bear a disproportionate burden of the changes. The purpose of this policy is to establish a threshold for determining when adverse effects of service changes are borne disproportionately by low-income populations.

The disproportionate burden threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by low-income populations as compared to impacts borne by non-low-income populations. The threshold will be applied uniformly, regardless of mode.

A “disproportionate burden” is defined by FTA Circular 4702.1B as a neutral policy or practice that disproportionately affects low-income population’s more than non-low-income populations.

For the purposes of this policy, “low-income population” is defined as having a median household income that is at or below 150% of the Department of Health and Human Services Poverty Guidelines.

### POLICY STATEMENT

The RTA has established its Disproportionate Burden threshold to be at the level of 20 percent or greater of the population that could possibly be affected by the major service change. Therefore, should the impact of any major service change require a low-income population to bear adverse effects of 20 percent or greater than those adverse effects borne by the non-low-income population, that impact will be deemed disproportionate. The threshold will be applied uniformly to all modes of service operated by the RTA.

The Policy applies to RTA service standards established for all modes of service. Those standards include the following:

- Vehicle Load;
- Vehicle Headway (Frequency);
- Route Directness;
- Transfers;
- On-time Performance; and,
- Service Availability.

If the RTA finds a disproportionate burden on identified low-income populations when applying the 20 percent threshold, it will consider modifying the proposed changes in order to avoid, minimize, or mitigate the disproportionate burden of the proposed changes. The RTA will exercise the same threshold and procedures to reanalyze the modified proposed changes to determine whether the modifications actually removed the potential disproportionate burden of the changes.

If the RTA does not alter the proposed service changes despite the potential disproportionate burden on low-income populations, or if it finds, even after the revisions, that the low-income population will continue to bear a disproportionate share of the proposed major service change or fare change, the RTA will implement the change only if the following criteria apply:

- 1) There is a substantial legitimate justification for the proposed major service change, and
- 2) The RTA can show that, after examining alternatives, there are no alternatives that would reduce the disproportionate burden on the low-income population but would still accomplish the legitimate program goals.

### **Resources for Comparison of Service or Fare Changes**

The RTA will include a justification for the selected comparison dataset for use in low-income population service equity analysis. The RTA will use the same comparison population data in low-income population service equity analyses as it uses for minority population service equity analyses.

### **Public Comment Opportunity**

RTA shall provide a meaningful opportunity for public comment on any proposed mitigation measures, including less discriminatory alternatives that may be available. The public comment or Public Hearing Process is defined in RTA Public Engagement Process.

The Director of Planning/Marketing will be responsible for ensuring compliance with this policy.



<b>Type:</b> Policy	<b>Number:</b> 6
<b>Department:</b> Customer and Business Development	
<b>Focus:</b> Major Service Change and Fare Equity	
<b>Document History</b> Approved: 9/3/2013 Effective: 9/3/2013 Revisions: 8/8/2017	<b>Pages:</b> 1 of 3
<b>Chief Executive Officer Signature:</b> 	<b>Date:</b> 8/8/2017

#### GENERAL DESCRIPTION

The RTA establishes this Title VI Major Service Change and Fare Equity Analysis Policy in compliance with applicable Federal requirements under Title VI of the Civil Rights Act of 1964, including 49 CFR Section 21, as well as Environmental Justice requirements under Executive Order 12898 and FTA Circular 4702.1B.

The Federal Transit Administration (FTA) requires that recipients of FTA funding evaluate the effects of major service changes and all fare changes on minority and low-income populations.

A “minority population” is defined in FTA Circular 4702.1B as any population of minority persons identifiable by race, color, or national origin. A “low-income” population is defined as having a median household income at or below 150% of the Department of Health and Human Services Poverty Guidelines.

For the purposes of this policy, “low-income population” is defined as having a median household income that is at or below 150% of the Department of Health and Human Services Poverty Guidelines.

This policy incorporates by reference the percentage thresholds for disparate impact and disproportionate burden from the RTA’s Title VI Disparate Impact Policy and Environmental Justice Disproportionate Burden Policy.

## **POLICY STATEMENT**

### **Fare Equity Analysis**

For the proposed changes that would increase or decrease the fares on the entire system, or on any mode, or by fare payment type or fare media, the RTA shall analyze any available information generated from annual ridership surveys indicating whether minority and/or low-income riders are disproportionately more likely to use the mode of service, payment type, or payment media that would be subject to the fare change. The RTA will describe the techniques and/or technologies used to collect data for analysis in its documentation of application of the Monitoring Procedure. (It is noted that Census data will not be effective for fare change analysis, since it is impossible to know, based on Census data, what fare media people are using.)

The RTA will conduct the following steps in accordance with this policy:

- 1) Determine the number and percent of overall riders, minority, and low-income users of each fare media being changed;
- 2) Review current fares vs. proposed fare change;
- 3) Compare the statistical percentage differences for each particular fare media between minority users and overall users; and
- 4) Compare the statistical percentage differences for each particular fare media between low-income users and overall users.

Should a proposed change result in a disparate impact on the basis of race, color, or national origin, the RTA will consider modifications to the proposed changes that avoid, minimize, or mitigate the disparate impact of the change. If the RTA finds a potential disparate impact and then modifies the proposed changes to avoid, minimize, or mitigate potential disparate impacts, the RTA will reanalyze the proposed changes to determine whether the modifications actually removed the potential disparate impacts of the changes.

If the RTA chooses not to alter the proposed fare changes despite the disparate impact on minority ridership, or if RTA finds, even after the revisions, that minority riders will continue to bear a disproportionate share of the proposed fare change, RTA may implement the fare change only if:

- 1) RTA has a substantial justification for the proposed change, and
- 2) RTA can show that there are no alternatives that would have a less disparate impact on minority riders but would still accomplish RTA's legitimate program goals.

If the RTA finds that low-income populations will bear a disproportionate burden of the proposed fare change, RTA will consider modifying the proposed changes to avoid, minimize, or mitigate the disproportionate burden of the change. The RTA will describe alternatives available to low-income populations affected by the fare changes

## **Exceptions**

In accordance with FTA Title VI Circular 4702.1B, the RTA will not require a fare equity analysis when the following exceptions apply:

- 1) “Spare the air days” or other when the RTA or local municipality has declared that all passengers ride free.
- 2) Temporary fare reductions that are mitigating measures for other actions (i.e., construction activities).
- 3) Promotional fare reductions lasting less than six months.

## **Public Comment Opportunity**

The RTA shall provide a meaningful opportunity for public comment on any proposed mitigation measures, including less discriminatory alternatives that may be available. The public comment or Public Hearing Process is defined in the RTA Public Engagement Process.

The Director of Planning and Marketing will be responsible for ensuring compliance with this policy.



<b>Type:</b> Procedure	<b>Number:</b> 4
<b>Department:</b> Customer and Business Development	
<b>Focus:</b> Title VI and Environmental Justice Service Monitoring Procedures	
<b>Document History</b> Approved: 9/3/2013 Effective: 9/3/2013 Revisions: 7/2017, 5/2023	<b>Pages:</b> 1 of 6
<b>Chief Executive Officer Signature:</b> 	<b>Date:</b> 5/9/2023

### **GENERAL DESCRIPTION**

The RTA’s Title VI and Environmental Justice Service Monitoring Procedures sets forth the criteria and steps necessary for the RTA’s consideration of service equity for existing services. The RTA will apply the Title VI and Environmental Justice Service Monitoring Procedures to ensure that there is no disparate impact to minority and non-minority service areas. Before implementing fare changes, the RTA will apply the appropriate procedures to ensure that there is no disproportionate burden borne by minority and/or low-income individuals.

The procedures outlined in this document correspond to the RTA’s Disparate Impact Policy.

The Chief Customer and Business Development Officer will be responsible for ensuring compliance with this procedure.

### **PROCEDURE STATEMENT**

#### **Monitoring Vehicle Load**

When measuring the Disparate Impact by minority and non-minority routes in terms of vehicle load, the RTA will apply vehicle load data samples to its service standards to obtain a sample of services in each of the respective demographic areas. A one week sample will be used and compared on a semi-annual basis. Table 1 outlines the comparison process.

The load factor is defined as “the number of passengers on board a vehicle divided by the number of seats available at a maximum load point.” The RTA’s Vehicle Loading Standards are outlined in the RTA Service Standards Manual. Per the Manual, if the load standard is exceeded for any 60-minute period, RTA staff will evaluate the potential for improving the service frequency. If the load is exceeded but not sustained for 60-minutes, the RTA will evaluate the possibility of adjusting schedule times to focus on more service before and after the overloaded trip.



## Monitoring On-Time Performance

The RTA vehicle is considered “on-time” when its departure is zero to five minutes after the scheduled time at the specified timepoint. A vehicle is scheduled late when it arrives five minutes and one second after the scheduled time at the specified timepoint. The on-time performance goal is 90 percent.

The RTA will measure on-time performance by mode and minority/non-minority routes. The Schedule Adherence By Route – Summary for each month will be used as that dataset for Table 3 which outlines the analysis requirements by route.

*Table 3: Comparison Table for On-Time Performance*

Type of Service	Average Percent On-Time		
	Early	On-Time	Late
Overall			
+/-20% Variance			
<b>Minority Routes</b>			
Local			
Suburban			
Crosstown			
Express			
Rural			
Feeder			
<b>Non-Minority Routes</b>			
Local			
Suburban			
Crosstown			
Express			
Rural			
Feeder			

## Monitoring the Impact of Changes to Route Directness

The RTA Service Standards Manual defines the system’s Route Directness Standards. As stated in the Manual, when a deviation exists or is being considered, the gain in convenience to those passengers who are boarding or alighting during the deviation must be balanced against the additional travel time for the passengers traveling through. The RTA will compare the Route Directness Standards on existing routes when a deviation is planned that will impact minority, non-minority, and low-income population of the TAZ or zip- code area served by the new deviation. The impact on the population will be compared against the additional travel time for minority, non-minority, and low-income passengers who are traveling through on the route.

## Monitoring Transfers and Connections Between Buses

Excessive transfers and/or extensive wait time when waiting for a second bus can discourage passengers from using the bus because of the inconvenience and added travel time from origin to destination. The RTA will use passenger surveys to monitor the number of buses used to get from origin to destination for services in minority and non-minority areas. It will also apply survey results to monitor passenger satisfaction with the connection-time between buses. When a route serving a minority area exceeds the system-wide average for transfers, the RTA will seek to design and implement service changes to reduce the number of transfers necessary for those passengers. A sample of ridership will be used to measure the transfers required by passengers. Tables 4 and 5 illustrate the comparison table to be applied.

*Table 4: Comparison of Transfers Required by Route*

<b>Type of Service</b>	<b>Average Number of Buses to Destination</b>
Overall	
+/-20% Variance	
<b>Minority Routes</b>	
Local	
Suburban	
Crosstown	
Express	
Rural	
Feeder	
<b>Non-Minority Routes</b>	
Local	
Suburban	
Crosstown	
Express	
Rural	
Feeder	

*Table 5: Comparison of Connections Between Buses*

<b>Type of Service</b>	<b>Average Passenger Rating</b>
Overall	
<b>Minority Routes</b>	
Local	
Suburban	
Crosstown	
Express	
Rural	
Feeder	
<b>Non-Minority Routes</b>	
Local	
Suburban	
Crosstown	
Express	
Rural	
Feeder	

**Monitoring the Impact of Fare Changes**

For proposed changes to fares on the entire system, or on certain modes, or by fare payment type or fare media, the RTA will analyze any available information generated from ridership surveys indicating whether minority and/or low-income riders are disproportionately more likely to use the mode of service, payment type, or payment media that would be subject to fare change. An example of the process taken for monitoring the impact of fare changes is provided in the Fare Equity Analysis Policy.

**Monitoring Vehicle Assignment**

The RTA will use the following procedure to monitor the Vehicle Assignment Policy. RTA will use Table 6 that analyzes each service type for average date of purchase, and average age of buses used. These averages will be determined using a sample for a given week.

*Table 6: Comparison Table for Vehicle Assignment*

<b>Type of Service</b>	<b>Average Date of Purchase</b>	<b>Average Age of Buses</b>
Overall		
+/-20% Variance		
<b>Minority Routes</b>		
Local		
Suburban		
Crosstown		
Express		
Rural		
Feeder		
<b>Non-Minority Routes</b>		
Local		
Suburban		
Crosstown		
Express		
Rural		
Feeder		

**Monitoring Service Availability**

As a way to monitor service availability, RTA will use the map “RTA Routes Demographic Analysis” provided by the Miami Valley Regional Planning Commission (MVRPC) until a new Decennial Census becomes available. RTA will continue to use geographic information system (GIS) and Census data to monitor the percentage of minority, Hispanic, and elderly populations that live within ¼ and ½ mile of RTA routes.



<b>Type:</b> Procedure	<b>Number:</b> 7
<b>Department:</b> Customer and Business Development	
<b>Focus:</b> Title VI Program	
<b>Document History</b> Approved: 8/1998 Effective: 8/1998 Revisions: 11/2008, 9/3/2013, 5/2023	<b>Pages:</b> 1 of 4
<b>Chief Executive Officer Signature:</b> 	<b>Date:</b> 5/9/2023

GENERAL DESCRIPTION

This establishes accepted procedures for developing and maintaining local standards in compliance with Title VI. These procedures establish internal guidelines for making determinations of compliance with Title VI as a part of the local decision making process and continuing project management and contract management responsibilities.

These procedures will apply to the RTA Planning and Service Development Department when conducting a compliance assessment and monitoring service performance. A full compliance assessment will take place when major service changes take place; and fare change; every three years; or when new census data is available.

It is the responsibility of the Planning and Service Development Department to conduct the compliance assessment.

PROCEDURE STATEMENT

Approvals

Every compliance assessment must be submitted to the Federal Transit Administration (FTA) for approval every three years. FTA will determine the exact date when another Title VI compliance assessment must be conducted. The Title VI program must be submitted to the Transit Award Management System (TrAMS) no fewer than 60 days prior to expiration of the Title VI Program.

**Conducting an Assessment**

Based on FTA Circular C4702.1B 10/1/12.

## **General Reporting Requirements**

- The provision of an annual Title VI Certification and Assurance as part of the RTA's annual Certification and Assurance submission to FTA.
- The development of Title VI complaint procedures and complaint form.
- The preparation and maintenance of a list of any active investigations by entities other than FTA, lawsuits, or complaints naming RTA and/or any sub-recipients that allege discrimination on the basis of race, color, or national origin. This information should be available from Human Resources.
- The provision of access to individuals that are Limited English Proficient (LEP) by the development of a Language Implementation Plan or other meaningful access.
- A requirement to notify beneficiaries of protection under Title VI.
- A requirement to provide additional information upon request.
- A requirement to prepare and submit a Title VI program.
- An analysis of site location of facilities and their impact on low-income and minority populations. This does not include shelters, transit stations or power substations as these are evaluated under different sections or processes.
- The promotion of inclusive public participation.
- Minority representation on planning and advisory bodies.

## **Program-Specific Requirements for Recipients Serving Large Urbanized Areas**

- Requirement to collect demographic data of service area and prepare service profile maps and charts after each decennial census and prior to proposed service reductions or eliminations.
- RTA will also collect survey information on customer demographics and travel patterns.
- This survey should be conducted using the rider intercept mode of operation in which riders of the RTA are questioned while either waiting for the bus or disembarking from the bus. RTA will employ FTA approved survey sample sizes, data expansion procedures and data collection methods suitable to RTA's service to obtain representative samples.
  - 1) The actual survey must include, but not necessarily be limited to, the following information.

- a) Demographics of RTA Riders:
    - Age
    - Race
    - Gender
    - National Origin
    - Income (range)
    - Address (including zip code)
    - English Proficiency
  - b) Frequency of use by non-minority/minority riders.
  - c) Purpose of trips by non-minority/minority riders.
  - d) Trip originations and destinations of non-minority/minority riders.
  - e) Peak hour trip travel times and trip mileage of non-minority/minority riders.
  - f) Awareness and satisfaction of RTA's services by non-minority/minority riders.
  - g) Total trip cost and method of fare payment by non-minority/minority riders.
  - h) Routes used during survey including transfers of non-minority/minority riders.
- Requirement to set and monitor quantitative system-wide service standards below for each fixed route mode of service (local, express, etc.)
    - 1) Vehicle Load
    - 2) Vehicle headway
    - 3) On-time performance
    - 4) Service availability
  - Requirement to set and monitor system-wide service policies to guard against service design and operational policies that have disparate impacts. Report any action taken after evaluation and provide documentation of Board awareness and approval. These include the following:
    - 1) Vehicle assignment process
    - 2) Distribution of transit amenities
  - Provide description of the public engagement process for setting the major service change policy and disparate impact policy and provide documentation of Board awareness and approval.
  - Report results of equity analysis for major service changes and/or fare changes implemented since last Title VI program submission and documentation of awareness and approval by the Board.
  - Requirement to monitor transit service standards and policies at minimum once every three years.
    - 1) Each route will be determined to be minority or non-minority per the FTA definition and a sample of routes from all modes of service provided will be evaluated against the service standard or policy.

- 2) If any route does not meet the standards, staff will analyze reasons and take steps to reduce the potential effects.
- 3) The disparate impact policy will be applied to the results of the monitoring activities.
- 4) Staff will report monitoring results to the Board and any action taken after evaluation and provide documentation of Board awareness and approval of monitoring results as well as the results in the Title VI program.

## Appendix A: Passenger Listed Starting and Ending Points (Origin & Destination Data)



## GDRTA Survey 2019

**What is the route number, your starting point, and your ending point of the bus you will be taking today (nearest intersection or address)?**

Answer Choices	Responses	
Route #	98.33%	1119
Starting Street Name	73.99%	842
Ending Street Name	67.05%	763
	<b>Answered</b>	<b>1138</b>
	<b>Skipped</b>	<b>32</b>

Respondents	Route #	Starting Street Name	Ending Street Name
1	34		
2	34		
3	34	needmore	north dixie
4	34	union road	needmore
5	9	gettysburg	germantown
6	16	wilmington	rezair
7	8	ridge avenue and riverside	northwest library
8	8		
9	8	westown hub	main street
10	8	westown hub	main street
11	7	third street	north main
12	7	westown hub	siebenthaler
13	7	nottingham	main and third
14	7	stewart	byers
15	7	abbey and third	downtown
16	7	riverside	2542 main street
17	7	main and philadelphia	wright stop plaza
18	7	main	main
19	7	illegible	bruce
20	7	main and helena	
21	7	stewart and main	north main and turner
22	9	stewart and germantown	main and third
23	7	wyoming and virginia	virginia and wyoming
24	7	apple	wright stop plaza
25	7	wyoming and brown	wright stop plaza
26	18	brandt pike	
27	4	oakridge	mia
28	7		
29	7	3rd	brown

30	24		
31	7	north main street	shadyside
32	16	main	apple and main
33	16	mansfield and kirkland	
34	16	wilmington and east dorothy lane	riverside and helena
35	16	ridge and riverside	old riverside
36	16	north main street	meijer
37	7	Nottingham	riverside
38	16		
39	9		
40	16	riverside	
41	16	ridge and riverview	riverside
42	16	wilmington avenue	nordale
43	16		edwin/wilkeson
44	16	wilmington and patterson	
45	9		
46	8	lakeview	downtown
47	9	germantown and liscom	g/l
48	9	nicholas road	kenbrook drive
49	9	liscum	needmore
50	9	germantown	
51	9	nicholas and stolz	wright stop
52	9	campbell	
53	9	1019 south euclid	euclid
54	1	east third	irving
55	1	brooklyn and third	wright stop plaza
56	1	third and iona	wright stop plaza
57	1	3rd and iona	wright stop
58	19	gettysburg	2
59	24	gettysburg and free pike	westown hub
60	24	gettysburg and holyoke	gettysburg and hoover
61	19	south hub	
62	19	edwin c mores	downtown
63	19	bowie and lasalle	
64	19	lyons ridge	hub
65	19	cobble circle	741
66	19		
67	17		

68	17	shroyer	hadley
69	17o	congress park	south hub
70	17	Main and Stewart	Stroop and Shroyer
71	17	Irving / Brown	
72	17	Paragon road	South Hub
73	8		
74	8	Cornell Dr	Wright Stop Plaza
75	8	Wright Stop Plaza	Salem + Klepenger
76	2	Burkhart	Wright Stop Plaza
77	8	Salem	Salem
78	8		
79	8		
80	8	Germantown	Paul Laurence Dunbary
81	4		
82	8	Northwest Hub	Westtown Hub
83	9	Lakeview	Germantown
84	8		
85	8		
86	8		
87	8		
88	8		Wright Stop Plaza
89	8	Salem	Salem
90	8	Wright Stop Plaza	Salem
91	8		Wright Stop Plaza
92	8	Salem	Salem
93	8		
94	8	Main Street	Salem
95	8	Riverview Terrace	Riverview Terrace
96	8	Salem + Plymouth	Salem + Plymouth
97	4	Hoover + Miller	Wright Stop Plaza
98	8	Salem + Delaware	Delaware
99	8	Northwest Hub	Salem
100	4	Gettysburg	Wright Stop Plaza
101	24	Gettysburg Ave.	Woodman + Dorthy Lane
102	4	Eastown Hub	Wright Stop Plaza
103	4	Westtown Hub	Eastown Hub
104	2,8	Shiloh	Broadway
105	2		
106	2	Broadway	Northwest hub
107	2	Sebinthalar	North West Hub
108	14-2	Salem	Cotalda
109	2		Rosedale/ Lexington

110	2		
111	2		
112	4	316 Parrot St	Wright Stop
113	4	Kammer	Easttown
114	4	Gettysburg	Linden
115	4	Main St	Linden
116	8	Main Street	Lenden st
117	4		
118	2	Burhard and woodman	Huffman seminary
119	2	Garfield/ 5th	Wright Stop
120	2	5 hight	Wright Stop
121	14	Malvern	Burns
122	14	Main st	Brown st
123	14	South Hub	Main
124	7		
125	14		
126	14	Wright Stop	548 Spring Valley
127	14	Farhills at wood	
128	14	Rehn	Bradstrut
129	14	227 Ernst	Riverside
130	8,9, 1	Germentown	Downtown
131	2	Drexel Iona	Fairfield commone
132	18	Dixe/ Marconi	Downtown Hub
133	18	741 S pixie	Wright Stop Hub
134	18	Patterson	Troy Pike
135	18	Central Henike	bus hub
136	9	Riverview	Wright Stop Plaza
137	18	MSB Central	Main
138	18	Wright Stop Plaza	Alex Bell at dixie
139	18	Jamar	Central, heinks
140	18	Central	
141	18		
142	18	Phildia	
143	19		Harshman and valley
144	18	Main	
145	8		
146	18	Wright Stop	Kettering Blvd
147	18		
148	18	Main	
149	1	W Third	Downtown
150	18		
151	18	Old Troy	Ketterring Dr
152	18	Troy St	Springborg rd

153	19	Camb/ Alex Bell	Main/Third
154	12/11	Grafton/Five Oak	Radio/Blackwood
155	12	Fairview	Wheatley to Hub
156	8	Westown	Walbash
157	12	Five Oaks/ Coraffon	Hillcrest / Auburn
158	12	Delaware ave	Salem
159	8	Salem Grand	Salem Grand
160	12	Fairview	Third St
161	12	Walbush/Fairview	Wright Stop
162	12		
163	12	Delaware	Wright Stop Plaza
164	12	Richmond	Wright Shop Plaza
165	7	Why mon wri	
166	7	Mumma	nottingham
167	7	Main St	Main St
168	7	fairview	hub
169	7	Main St	Germantown
170	8	Main St	hoover ave
171	7	Main St	Fairview
172	X5	75	78
173	X5	Main St	Dayton Mall
174	2 and X5	5th and findby	Hub
175	X5	Helvo	Hub
176	X5	helvo	Hub
177	9	Germantown/ Gettysburg	Germantown/Gettysbu rg
178	7	Helena St	Vincent St
179	All	All	All
180	4		
181	8	3rd/ Main Street	Wolf Rd
182	8	Da Bass	Telecris plasma
183	8	Main Street	Main Street
184	8	Salem and cornett	Northwest Hub
185	8	Salem/catalpa	northwest plaza
186	9	Evansville	Northwest Hub
187	8	Worthwest	U6
188	8		
189	8	Denlinger	WSP
190	8	Jefferson St	S Alex Rd
191	8	Benton/ Salem	VA
192	8	Salem	Lakeview
193	9,24,22,8	Gettysburg	Gettysburg
194	16	Marshall Rd	
195	8	Salem	Geramanfown

196	8		
197	8		
198	9	Stewart + Broadway	Hillcrest
199	19	Brandt Pike	Taylorville
200	12		
201	12	Catalpa	Catalpa
202	X5	Dayton Mall	Wright Stop Plaza
203	11	Eastown Hub	Wright Stop Plaza
204	X5	Wright Stop Plaza	
205	X5	Kings Ridge	Wright Stop Plaza
206	X5	Dollar Tree	Wright Stop Plaza
207	2	Motel 6	Wright Stop Plaza
208	2	Main + 3rd	
209	18		
210	2		
211	9		
212	2	Broadway	Huffman
213	7		
214	7	Kingston	Wright Stop Plaza
215	7	White Allen	Missouri
216	7		
217	7	Wyoming	
218	11		
219	4		
220	66		
221	64		
222	7		
223	8	Salem	4th + Perry
224	65		
225	65		
226	8	Lakeview	Dearborn
227	8	Philadelphia	Germantown + Lakeview
228	8		
229	66		
230	8	VA	Wright Stop Plaza
231	8	Germantown	Salem
232	8	Lakeview	Clifton
233	64		
234	7	Wright Stop Plaza	Philadelphia
235	14		
236	7		
237	19		
238	7	Delaware	Main

239	7		
240	7	Vincent + Main	Main + Hudson
241	7		
242	7		
243	7	N. Main	Ludlow
244	7	Main	Wright Stop Plaza
245	7	Main	Wright Stop Plaza
246	7	Macy	Main
247	7		
248	7	Main + Hillcrest	Wright Stop Plaza
249	7	Hillcrest	Wright Stop Plaza
250	7	Main + Hillcrest	Wright Stop Plaza
251	7	Main	Wright Stop Plaza
252	12	Fairview	Wright Stop Plaza
253	12		
254	12	Wheatly	Santa Clara
255	12		
256	12		
257	12		
258	12		
259	12		
260	12		
261	12	Catapla + Sunnyview	
262	12	Wright Stop Plaza	Fairview
263	8	Salem	Salem
264	14		
265	14	Wright Stop Plaza	Salem
266	14		
267	14	Germantown	Union
268	14		
269	14	Olive	3rd
270	14	Salmon	Wright Stop Plaza
271	4	Xenia Ave	Ludlow
272	18	Wright Stop Plaza	Ludlow
273	18	Delaware	Dorothy Lane
274	8	Germantown	Euclid
275	8	Mound Street	Main Street
276	8	Mound	Main
277	9		
278	9	West Hub	Wright Stop
279	9		
280	9		
281	9		

282	9		
283	14	Brown	Derlinger
284	Flyer		
285	Flyer		
286	1		
287	Flyer		
288	Flyer		
289	Flyer		
290	7		
291	12	Brown	
292	12	Wayne	Wayne
293	12	Wayne	Medford
294	12		
295	12	5th Street	
296	Flyer	Brown and Stewart	Main and 3rd
297	4	Kilmer	Brown
298	14	Hillcrest	Hillcrest
299	4	Third Street	Xenia
300	12		
301	8	Westown Hub	Third & Main
302	9	Main & 3rd	Same
303	9	Kipling and Cornell	Wright Stop
304	14	Olive and Main	Brown
305	Flyer		5th Street
306	Flyer	Premier Health	
307	Flyer		
308	Flyer	Brown and Wyoming	Main and 3rd
309	9		
310	8	Huber	Burwood
311	1, 22	Colonel Glenn	Troy
312	Flyer		
313	Flyer		
314	1	Third & Smithville	Third & Smithville
315	1	Third & Smithville	West Town Plaza
316	14	48 & Franklin	Monument YMCA
317	9	Woodcrest	Wright Stop
318	1	Third Street	Wright State
319	9	Kipling	Otterbien
320	9		
321	4	Wright Stop Plaza	Zente (survey 1560)
322	9	Nicholas	Wright Stop
323	9		
324	9		
325	9	Gettysburg	Wright Stop

326		19 - Valley	1 - Hub
327	9	Nicholas	Job Center
328	9		
329	4	Third & Perry	James H McGee
330	9	Nicholas	McArthur
331	4	Third & Main	Third Y JH McGee
332	4		
333	4	Kammer	Maine
334	9	Hoover	Nicholas
335	9		
336	14	Parkfield & Crundu	Crundu & Parkfield
337	9		
338	9		
339	9	Wright Plaza	Stewart
340	18	Wright Stop Plaza	1st Central Street
341	9	Iowa	Meredith
342	9	Stewart	Wright Stop
343	1	Pentagon Blvd	Wright Stop Plaza
344	19	Edwin C Moses	Cincinnati
345	9	Stolz	Main Street
346	7	Wright Stop Plaza	
347	9	Wright Stop	Riverview
348	9		
349	9		
350	9	Kings Highway	St. Elizabeth Place
351	9	Gettysburg	Wright Stop
352	1	Wright Stop Plaza	Library
353	11	Woodman and Linden	Stroop and Marshall
354	8		
355	11		
356	1, 2	3rd Y Sperling	East Town Hub
357	Flyer	Burns Ave	Monument
358	1 & 7	Student Union	Wright Stop Plaza
359	Flyer		
360	1	Wright State	3rd & Main
361	1	Wright	Third Street
362		Pentagon Blvd	Byers Road
363	18	Wright Stop	Moraine
364	22	Gettysburg	Main and Stout
365	1		
366	Flyer		
367	18		
368	1	Airway & Woodman	3rd & Iona

369	Flyer	Main and 2nd	Brown and Stewart
370	12	Krebs	Downtown
371	12	Fairview	Patterson
372	12	(can't read- survey 1326)	
373	12	Patterson	Hub
374	12	Catalpa & Riverview	Wayne
375	Flyer		
376	12	3rd	Dorothy Lane
377	Flyer	Brown	Monument
378	12	Wayne Ave	
379	Flyer	Brown	Main Street
380	9	Prescott	Downtown
381	9	Miami Chaple	Alwildy
382	9	Kipling	
383	12	West Main Street	The Greene
384	2	Huffman and Smithville	
385	12	Fairview & Catalpa	Stroop & Glengarry
386	Flyer	Brown	4th and Main
387	Flyer	5th Street	Main Street
388	1		
389	Flyer	2nd Street	Main Street
390	1, 12	3rd & Hedges	Wilmington & Patterson
391	Flyer	Stewart	2nd Street
392	Flyer		Premier Health
393	1		Downtown Hub
394	Flyer	UD	Oregon
395	9		
396	9	Louella	Maine
397	7	3rd & Main	Wyoming
398	7	Main & 3rd	
399	7	Watervilet	Main
400	7	Creighton	Germantown
401	7	Watervilet & Nill	Main & Cliff
402	14	Far Hills	Dorothy Lane
403	9 & 7	Stewart & Danner	Patterson & Woodman
404	7	Wyoming	Downtown
405	1		Pentagon Commons
406	1		Pentagon Commons
407	1	E 3rd & Quentin	Wright Point

408	12	Patterson & ? (survey 1327)	
409	1	3640 Colonel Glenn Hwy	Walrmt - Pentagon Blvd
410	11, 1, 22,17	Radio & Blackwood	
411	11 & 24	Woodman	Stroop
412	24 & 1	South Main	Project Cure
413	24		
414	24		725
415	24		
416	24	(can't read it. Survey #0981)	
417	24		
418	24	741 & Cobblegate	741 & Cobblegate
419	24		
420	24		
421	8 & 24	Germantown & Lakeview	Salem & Manhattan
422	24	3rd Street	Rt 741
423	24		
424	19	4th & Ludlow	Kingsridge
425	19	South Hub	Moraine & Ohio
426	19		
427	19		
428	9	Lauella	Maine
429	Flyer	Brown Street	Main Street
430	Flyer	Brown and Stewart	6th and Jefferson
431	Flyer		
432	Flyer	Salem	
433	Flyer	First/St. Clair	Jefferson
434	Flyer		
435	Flyer		Premier
436	Flyer	1st/St. Clair	Warren/Burns
437	Flyer	Oregon	UD
438	Flyer		
439	7	Main Street	Brown Street
440	Flyer	E 6th St	Brown
441	8	Salem and Annapolis	Edwin C Moses and Cincinnati
442	8	Wright Stop	Westtown
443	11 & 12	Lenora & Stroop	Downtown
444	8	Salem and Philadelphia	Dorthy Lane
445	17		

446	17		
447	23	725 & Lyons	Dorothy & Woodmen
448	8	Central	Salem
449	23	Miegers	Dorothy & Woodman
450	23		
451	23	Cleveland	Whipp & Bigger
452	8	Salem and Catalpa	Congress Park
453	8		
454		Honeybee	Brown Street
455		Honeybee	Brown Street
456	4	Summit Square	Downtown
457	4		
458	4	Kramer & Grmont	Anna & Kramer
459		Elison St	Patterson
460	8	Salem	Downtown
461	4	Catalpa & Philadelphia	Linden & Smith
462	8	Salem	Downtown
463	4		
464	7	Main and Hillcrest	Wright Stop Plaza
465	4 & 17	Jones & Bainbridge	Xenia & Steele
466	2	Northwest Hub	Linden
467	12	Richmond & Soaks	East Town Hub
468	4	Xenia	Linden
469	2		
470	2		
471	4	Hoover	Miller
472	2		
473	4		
474	2		
475	4	Hearthstone	Sinclair
476	4		
477	4		Downtown
478	4	Linden & Smithville	Wright Stop
479	4		Downtown
480	4		Westown Hub
481	4	Linden Ave	
482	4	Linden	Westown Hub
483	8	Keowee	Hoover
484	4	Eastown Hub	Wright Plaza
485	4-7	Linden - Main	Main
486	4	Westown Hub	Eastown Hub

487	4	Santa Cruz	Downtown
488	4	3rd	Westown Hub
489	4		
490	4	Santa Cruz	Downtown
491	4	Kramer	Linder
492		Xenia Ave	East 3rd Street
493	4	Walton & Oakridge	Salem
494		220 Way Ave	East Way
495	8	Salem/Falmouth	Hoover
496	8	Germantown	Danner
497	7	Point View	Point View
498	4		
499	2	Huffman	Hoover Ave
500	3	Third St.	Brooklyn
501	9		
502	9		
503	9	Main	
504	7		
505	7	Wright Stop Plaza	N Main St
506	18	Leo and Roy	
507	7		
508	9		
509	7		
510	7	Main St	Main St.
511		Parkwood	Parkwood
512	7		
513	7	Wyoming Street	Woodman Drive
514	7		
515	7	Castlewood	Brown Street
516	7		
517	7		
518	7	Downtown	Main
519	7		
520	7	Main and Burton	Main and Shoopmill
521	8	Salem	Shiloh
522	7	Jefferson Transit Center	Apple St
523	7		
524	9	Germantown	Downtown
525	9	Job Center	Wright Stop
526	9		
527	9	Broadway	
528	9		
529	9	Wright Stop	

530	9		
531	4	Westtown hub	Easttown hub
532	4	Easttown hub	Wright stop plaza
533	24	Gettysburg	Woodman and dorothy
534	4	Gettysburg	Downtown
535	8	Northwest	Salem
536	8	Salem	Delaware
537	4	Hoover/miller	Downtown
538	8	Salem/plymouth	Salem/Plymouth
539	8	Rivertown	
540		Main st	Salem
541	8		
542	8	Salem	Salem
543	8	Burkhart	Hub
544	8	Hub	Salem
545	8	Salem	Salem
546	8		Downtown
547		Salem	
548	8		
549	8 and 17		
550	8	Salem/catalpa	725/mcewen
551	9	Lakeview	Germantown
552	8	Nw hub	Westtown hub
553	4	Kammer	Mcnary
554	8	Germantown	Paul Laurence dunbary
555	8		
556	8	Salem	Salem
557	2	Burkhart	Hub
558	8	Hub	Salem/klepenger
559	8	Cornell	Downtown
560	4	Salem/Hillcrest	
561	2	broadway	
562	2	broadway	
563	2	huffman	
564	2		
565	2		
566	2		
567	4		
568	4	xenia / st. paul	woodmen
569	1, 23	st. dawl	woodman
570	1		
571	19	alex bell	lamme rd

572	19	downtown	main st
573	19		
574	19	edwin c	valley
575	19	edwing	valley
576	11	downtown	
577	19	17 dayton strug	
578	19	3076	
579	19		
580	19	kingsridge dr	e dorothy lane
581	19		
582	24	pinnacle	south hub
583	19	8601 lyonsburg	
584	19		
585	19	walmart	wright stop plaza
586	19	brit pike	
587	19	harshman rd	harshman rd
588	18, 17	brandt pike	shroyer rd
589	19	harshman	downtown
590	19, 18	walley	springboro pike
591	19	childrens hospital	
592	9		
593	9	miami chapel	specialty
594	8		
595	4		
596	2		fifth st
597	19	brandt	nebraska
598	8	parkway / salem ave	fifth st / oregon distric
599	22		
600	x5	south	
601	17, 19	north main st / wright stop plaza	downtown / dryden rd
602	17		
603	17	wright stop plaza	keowee st 1316
604	1		
605	1		
606	1		
607	12	dorothy lane	fairview ave
608	1	downtown	finley
609	1		
610	18	troy st	heid st
611	18	troy / warner	phillips / arbor
612	18	wright	dorothy / s dixie
613	2	lexington	third st

614	18	3rd st	brandt pike
615	17	north dixie	
616	18	harshmanville	taylorsville
617	19	beatrice / harshman	old trop pike
618	18	brandt	hub
619	18	taylorsville / harmansville	stroop road
620	18	buffort	wright stop plaza
621	18	giles	
622	18	harshmanville / tybersville	hub
623	4	linden ave	santa cruz
624	18		
625	18	downtown	dorthy lane
626	4	linden ave	santa cruz
627	18	hub	south community
628	18	brant	first
629	17, 19		
630	12	wright stop plaza	woodman dr
631	12		
632	12		
633	8, 14		
634	12	farrer	farrer
635	12	downtown	dorothy lane
636	12	lenora	lenora
637	12	downtown	jefferson
638	18		
639	18		
640	18		
641	18		
642	8	almond village	w third
643	4		
644	4	xenia	steel
645	4	smithville	
646	4		
647	8	malvern	westtown hub
648	4	smithville	xenia
649	4	smithville / linden	saalem / princeton
650	2, 8		
651	2		
652	2		
653	1	e third / findlay	e third / findlay
654	2	downtown	downtown
655	2, 18	henry st / 5th	kettering blvd

656	9		
657	2	wright stop plaza	5th / high
658	2		
659	4	hoover	gettysurg
660	14		
661	2	lexington / kumler	third / main
662	2	shiloh springs	philadelphia dr
663	2	northwest hub	
664	2, 1	phil / cornell	3rd / anna
665	2	meadale	hoovex / lilac
666	2	shiloh / biddison	wright stop plaza
667	2	northwest hub	eastown hub
668	2	lexington	euclid
669	2	huffman	hollier
670	2	huffman	wolf
671	2	huffman	wolf / turner
672	2	huffman	huffman
673	2	huffman	huffman
674	2	smithville / huffman	huffman
675	17	wright stop plaza	huffman / shedborre
676	17	david	
677	17	wright stop plaza	alex bell
678	17	main / franklin	shroyer / stroop
679	12	fairview / rustic	4th
680	17	patterson rd	
681	17	wright stop plaza	shroyer
682	x5	third / jefferson	spring valley pike
683	17	south hub	washton village dr
684	7	Patterson	Main
685	17	patterson / shroyer	irving / brown
686	17	south hub	wright stop plaza
687	17	wright stop plaza	southwest hub
688	16	marky / main	motel 6 in englewood
689	18, 16	king richard	smith / hoke
690	16	wilmington	rt 48
691	16	wilmington ave	wright stop plaza
692	16	composite	ryburn
693	16	wilmington	ud stewart
694	16	dorothy	westown
695	16	dawnwood	wright stop plaza
696	16	meijer / englewood	costco / feedwire
697	16	union / wgner	bigger / rhan
698	16	wilmington	old riverside dr

699	16	riverside dr	eastown
700	16	riverside	parkwood
701	16	helena / riverside	wilmington / roslyn
702	16	mary ave	wilmington / clyo
703	16		
704	16	huffman	wilmington
705	8	germantown	germantown
706	2	burkhart / casler	casler
707	16	main st	clyo
708	16	wright stop plaza	wright stop plaza
709	16		
710	16	wilmington / devon	clyo / mvrthus
711	16	wiles / dorothy	clyo
712	16	wilmington	clyo
713	16	downtown	dyo / murphy
714	16	wilmington	wilmington
715	16, 22	wilmington	dixie
716	16	colfax	martz / burkhardt
717	8		
718	16	nordale	main
719	16	wilmington / devon	main st
720	16	tanks bar 3535	wayne ave
721	16	old riverside	n main 8200 block
722	16	riverside	meijer 48
723	16	woolery lane	plaza
724	11		
725	16	rierside	hub
726	16	660 S Main St	N Main St / Philadelphia
727	X5		
728	X6		
729	34		
730	34		
731	18		
732	18		
733	18		
734	18		
735	17		
736	17		
737	17		
738	17		
739	17		
740	17, 22	dixie	
741	17	dixieer	dixie

742	17	stanley	millar
743	17	stanley	millar
744	17	york commons	dixie
745	17	n dixie	wright stop plaza
746	17	inritional red	n dixie dr
747	17	dixie	jefferson se
748	17	dixie / needmore	wright stop plaza
749	17	wright stop plaza	sr 725 / lyons
750	17	helena / stanley	
751	17	linden ave	south hub
752	17		
753	17	5th / main	stroop / shroyer
754	17	shroyer / hadley	powagon tavan
755	17	far hills / whip	stroop / lane
756	19	stroop / cordell	south hub
757	17	725	shroyer / winden
758	12, 17	wayne ave	725 / southwest
759	12	12	
760	17	shroyer	shroyer
761	12		
762	15	south hub	
763	11	stroop / wagner	stroop / wagner
764	11	marshall	
765	14	olive rd	olive rd
766	14	3715 shiloh springs	olive
767	14	salem / grand	shilog springs rd
768	14	Freepike / Olive	Freepike / Feb
769	14	trotwood / Broadway	northwest hub
770	14	northwest	downtown
771	14	coronodo / marion	w third st
772	24	meijer	meijer
773	14, 24	shiloh sprins rod	north main st
774	24	northwest hub	cornell
775	24	meijer	south hub
776	24	northwest hub	south hub
777	24		
778	24	gettysburg	westtown
779	24	westown hub	dayton mall
780	1	dexen ave	3rd
781	1	gettysburg/ third	
782	24		sellers
783	24	sellers	downtown
784	24		
785	17	south hub	n dixie

786	24	alex / indian trail	preshr plaza ct 31
787	24	prestige lane	741 / kingsridge
788	24	mallwoods	gettysburg
789	23	741 / Franklin	Parby
790	24	Beechgrove	Project Cure
791	24	VA Hospital	Westown
792	24	Germantown	Gettysburg
793	24		
794	24		
795	14	Main / Stuckart	Wright Stop Plaza
796	19	Hayshman	Hub
797	12	Wheatly / Santaclara	Elizabeth Place
798	8	Salem	Salem
799	14		
800	14		
801	23	Franklin	48
802	14	Northwest Hub	Wright Stop Plaza
803	17	2nd / St. Clair	Wittershared / Shroyer
804	17	Irving / Linwood	
805	17	Wright Stop Plaza	Shroyer / East
806	17	Wright Stop Hub	East Dorothy / Shroyer
807	17	Main / Wayne	Wayne
808	17	Write Stop Plaza	Peach Orchard
809	1		
810	17	Hub	Raha / Far Hills
811	9	Oxford / Tennesony	Keowee
812	17	Needmore / Pitie	Dayton Mall
813	17	Paragon	Shroyer / Far Hills
814	1	Wright Stop Plaza	
815	1	Glen / Zinc	3rd / Felt
816	1	3rd / Hedges	3rd / Main
817	1	Westown	Westown
818	16	Basswood	Westown Hub
819	1	Wright Stop Plaza	West 3rd / Iona
820	11		
821	1		
822	17		Shroyer / Patteron
823	1	Community / Troy	Eastong Shopping Center
824	2	Lexington Rosedale	Fairborn
825	1	Write Stop Plaza	Paramount
826	1		

827	1	Third / Infirmary	Third / Miller
828	1		
829	1, 22, 17	Dixie	Wright State
830	1	Wright Stop Plaza	Millet Hall - Wright State University
831	8	Lakeview / Burwood	Wilmington / Feedwire
832	8	Clement	Wright Stop
833	8	Lakeview / Demut	Wright Stop Plaza
834	8	Lakeview	
835	1	3rd	
836	4, 18	Patterns	Back Patterns
837	1		
838	1		
839	1		
840	1, 12	Third / Hedges	Woodman / Dorothy
841	1	Pimler	Keowee
842	1	3rd / Irwin	
843	1	Third	Sperling
844	22	Mens Shelter	Downtown
845	17	Wright Stop Plaza	Millet Ln
846	1		
847	1		
848	1		
849	1	East / West	East / West
850	1	3rd / Findaly	Hub
851	14	Farhills	Downtown
852	1	Wayne Ave	Downtown
853	1		
854	7		
855	7	Wyoming / Alassau	725 / 741
856	7		
857	9		
858	9		
859	9		
860	9, 22, 19, 14, 1	Job Center	
861	9		
862	2	Huffman	Downtown
863	2	Wright / Huffman	Wright Stop Plaza
864	2		
865	2	Spinning	Wright Stop Plaza
866	2	Burhardt / Dodge	5th / Patterson
867	2		
868	2	5th	Huffman Ave

869	2	Shedborne	Burkardt
870	19	Wright Stop Plaza	
871	XS	Southhub	Southhub
872	12	Fairview	Catalpa
873	12	Wright Stop Plaza	Tennco
874	1	Germantown	Wright Stop Plaza
875	8		
876	8	Riverview	
877	8	Salem	
878	8	holt	
879	8	Riverview	Salem
880	8	Denlinger	Wright Stop Plaza
881	8, 7, 34	Webster	Main
882	8		
883	8	Needmore	Salem
884	8	Salem / Wabash	Salem / Fairport
885	8		
886	8		
887	8	Salem	Wright Stop / Free Pike
888	8, 17		
889	8	Salem / Catalpa	Wright Stop Plaza
890	8		Stuart
891	8	Benson	Downtown
892	8		
893	8	Salem	Hub
894	8	Salem / Catalpa	Loop Center
895	8	Salem / Catalpa	Wright Stop Plaza
896		#601 Xenia	
897	8, 2	Lakeview	Northwest Hub
898	8	Westtown	Northwest Hub
899	8	Salem / Plymouth	Salem / Plymouth
900	8	Salem	Philedalphie
901	8	Salem	Northwest hub
902	7	North Main / Hillcrest	Wayne / Waterville
903		Main	Appell
904		4367 Parkway / Dr appnts	
905	7		
906	7	Chewy	Epworth / Wyoming
907	1	3rd / van lear	
908	18	patterson	patterson
909	11	mcarthur	westtown
910	1	main / third	210 N main st.

911	1	wright stop plaza	
912	4	hoovers	downtown
913	18	delaware	dorthy lane
914	7	wright stop	northwest hub
915	2	lexington	wright stop
916	22	1717 banker place	wright stop plaza
917	7	wyoming casino	
918	22	rta bus hub	miller lane
919	22	Forest Grand	wright stop
920	22		
921	23	southhub	
922	19		
923	19	Eckley	bus hub
924	19		
925	19	dryden and northlawn	elmhurst and midway
926	18	chambersburg and troy	
927	19	alex bell and student	wright stop
928	17	lyons @ 725	Kingsridge @ 725
929	17	wright plaza	south hub
930	11	Main & Burns	Stroop & Wilmington
931	16	Wayne	Wilmington
932	11	East Third and Huffman	Far Hills and Stroop
933	11	Woodman & Stroop	Wright Stop Plaza
934	11	Meijer	Wright Stop Plaza
935	11	Stroop	Meijer
936	3	Wayne	Downtown Hub
937	11	Stroop/Shroyer	Wright Plaza
938	2	Spinning	Shilohspring
939	16		HUB
940	12		
941	9	Edwin C Moses	Main St
942	9	Oxford & Tenn	Harriet street and Cinn street
943	9	Stewart	Downtown
944	9	Danner & Stewart	Sholtz
945	9	Blairwood	Vanguard
946	9	VA	Northwest Hub
947	9	VA	Germantown
948	9	St Elizabeth Place	James H McGee
949	9	Germantown & Gettysburg	Same

950	9	Job Center	Third Street
951	16-9-16-23	Wright State Meijer	725 & McEwen
952	24	Sellers & Vance	Sellers & Vance
953	9	Germantown	
954	9	Klepinger	Main Street
955		Fairview	??
956	1	E Third	E Third
957	9	Wright Stop	Edwin C & Cincinnatti
958	9	Lexington	
959	9	Otterbein/Kipling	Job Cener
960	9	Kiepling	Cornell
961		N Gettysburg Ave	Shadow Lawn Ave
962	9		
963	9	St James Arlene	Wright Stop Plaza
964	9	Arlene	Downtown
965	9	Arlene Ave	
966	18		
967	17	Alkaline Springs	
968	18/9	Troy and Chaple	Chaple
969	1		
970	17	Wright Stop Plaza	Paragon Road
971	17	Main and 5th	Shroyer and East
972	17	Wright Stop	E Dorothy and Shroyer
973	17	Wright Stop	Franklin & Main
974	19	Lyons Road	Edwin C Moses
975	19 & 14		
976	19	Alexbell	Five Oaks
977	19	Harshman	Harshman
978	19	3rd	Brandt
979	8	Germantown	
980	16 and 19	Wilmington/Brownleigh	Wal-Mart
981	19/17	Shulle and Townbridge	Dixie and Cloverdale
982	19	Meijer/Executive Blvd	Downtown
983	18/19	Benjamin Court	Power Road
984	18/19	Merily Way	Wright Stop Plaza
985	19	Brandt/Chambersburg	Monument/Main
986	19/17/12	Brandt Pike	Shroyer Road
987	19	Powell	Main

988	14	Harshman	Wright Stop Plaza
989		Harshman	South Hub
990	22	Jefferson	Wilkinson
991	22		
992	22	Racino	
993	22		
994	17	Dixie	
995	16	Wilmington	Downtown
996	22	York Commons	Wright Stop Plaza
997	22	North Dixie	Needmore
998	22	Needmore & Payne	Job Center
999	22 and 12	North Dixie & Needmore	Woodman Drive
1000	17	Webster and Herbert	Downtown
1001	9	Hub	McArthur
1002	12 and 17	Wayne & Utah	725 & Southwind
1003	19	Brant	Nebraska
1004	8	5th & Ludlow	Wright Stop Plaza
1005	8,14,9	Salem and Reiverview	Salem and Edgemont
1006	9	Prescott	
1007	7, 1, 8, 16		Nottingham
1008	1	Wright State	
1009	1		
1010	22	Wright Plaza	
1011	22	Town Plaza	
1012	22		
1013	22		
1014	1	Downtown Hub	Third and Liscum
1015	18/24	1st	Lions Ridge
1016	24/18	Gtown.Gettysburg	3010 Kettering
1017	24	741	
1018	2/34/24	Gettysburg	Northwest Hub
1019	24	Gettysburg	Free Pike
1020	12	Forrer & hazel	Northwest Hub
1021	12	Woodman	Hub
1022	34	Biddisun	Shiloh Springs
1023	56	oak	3rd
1024	56		
1025	8	Salem	Salem
1026	16	Kettering Square	Renna
1027	9	Oxford	Tennyson
1028	4	Guenther & Hoover	
1029	12	Wright Stop Plaza	Wayne & Anderson

1030	34	Needmore	Dixie
1031	22		
1032	16	Citation	Wilmington
1033	16		
1034	16	Bigger & David	Old Riverside & Wampler
1035	16		
1036	16	Wilmington Pike	HUB
1037	16/1		
1038	16		Main Street
1039	16	Brown & Stewart	Brown & Stewart
1040	22	Gettysburg	Wright stop plaza
1041		Redwood	
1042	18	Homeview Drive	Homeview Drive
1043	7	Union Ren Walker	Union Taywood
1044	16	Kroger	Downtown
1045	16		
1046	16	Meijer	6200 N Main
1047	16		
1048	9		
1049	9	McArthur	Whipp and Bigger
1050	9		
1051	9		
1052	9	Derby	Blairwood
1053	9		
1054	9		
1055	1/12/24/4		
1056		St E Hospital	Richmond Ave
1057	1/9/2	3rd Downtown	Downtown/Job Center
1058	9	Nocholas	Almore
1059	19		
1060	16		
1061	16	Rydale	Wright Stop Plaza
1062	16	Riverside 7 Bruce	Downtown
1063	2		
1064	16	Riverside/Beechwood	Downtown Hub
1065	16/18	Riverside	Old Troy
1066	16/17	Parkwood/Riverside	Dixie/Needmore
1067	16	Wilmington	Wilmington & composite
1068	16	Wilmington	Downtown
1069	8	Salem and Wabash	HUB

1070	16	Wright Stop Plaza	Whipp and Brainard
1071	16	Devon	Hub
1072	16	Wright Stop Plaza	Montgomery Square & Renee
1073	16	Apple St	Patterson
1074	16	Wilmington Ave	Patterson
1075	16	Nordale	Nordale
1076	16	Wilmington	Wayne
1077	16	Wilmington	Wayne
1078	16	Forrer	Wilmington
1079	16	Wilmington	Wilmington
1080	16	Wilmington at Meijer	Wright Stop Plaza
1081	16	Wilmington and Brownleigh	Patterson
1082	16	Wilmington	Patterson
1083	16	Wilmington & Patterson	Wright Stop Plaza
1084	16	Wilmington	Downtown
1085	16	Wilmington & Devern	Brown & Stewart
1086	16	Brownleigh	Wilmington
1087	9		
1088	16	Hillcrest	Jefferson
1089	7	Santa Clara	Ridge
1090	16	Wright Stop Plaza	Helena & Riverside
1091	8	Salem	
1092	16	Main Stop	Englewood
1093	16		
1094	11	Blackwood and Radio	
1095	12		
1096	16		
1097	1	Quentin	Hoover
1098	12	Dorothy Lane	Wright Stop Plaza
1099	12	4 South Main	Community Drive 7 Troy Pike
1100	12	downtown	5th Street
1101	12		
1102	19	Crisis Care	Downtown
1103	24	Alex and Kingsridge	Kingsridge and Lyons
1104	7	Main & Philadelphia	Main & Parkwood
1105	16	Rt 48 & Turner	N Main Street
1106	7	Babbitt	

1107	7	Main	Main
1108	7	Phillips and Wyoming	Main
1109	7	Apple & Main	Main
1110	7	Apple Street	Apple Street
1111	7		
1112	7	Wayne	Downtown
1113	7	Waterviliet	Wright Stop Plaza
1114	7		
1115	7	N Main and Helena	Wright Stop
1116	7		
1117	7		
1118	7	Wyoming & Creighton	Wright Stop Plaza
1119	7	Wyoming & Craig	Wright Stop Plaza
1120	7	Wayne	Woodman & Patterson
1121		Salem Ave	3rd @ James H
1122	16	Riverside and Bruce	Wilmington Betz Crossing
1123	12	Grand & First	
1124	X5	Wright Stop Plaza	Byers Road
1125	4	Nassau & Xenia	
1126	2	Valerie Arms Drive	South Hub
1127	1	Third Street	Downtown Hub
1128	4	Wright Stop	EastTown Plaza
1129	1	Student Union	Student Union
1130	1	Third and Irwin	Main and Great Miami
1131	1	Sperling	SR 48
1132	2	3rd	Downtown
1133	1	Colonel Glenn/Grange hall	Third Street
1134	1	Quentin Ave	
1135	1	Quentin	Hoover
1136	18	Taylorville	Job Center
1137	9	downtown	VA
1138	8	wright stop plaza	