



## Detroit Department of Transportation

### January 2024 Service Change Equity Analysis

#### Governing Official Signature

The Federal Transit Administration mandates that all primary recipients of federal funding complete an equity analysis whenever the agency undergoes a major service change. The Detroit Department of Transportation (DDOT) defines a major service change as: a 20 percent or greater change to revenue hours and/or revenue miles on any one route; the shifting, shortening, or lengthening of a route alignment by more than 0.2 miles; adding or eliminating route; and a change in service days, service span more than two hours, or in headway greater than 15 minutes.

The Title VI equity analysis compares the proposed January service changes to the previously scheduled service. Based on DDOT's Major Service Change definition, it was found that only route 9 Jefferson has undergone a major service change due to the implementation of BRT.

Because 9 Jefferson is considered a minority and low-income route, the service analysis found no disparate impact or disproportionate burden on minority or low-income communities.

DDOT's Title VI Service Change Equity Analysis for January 2024 Service Changes has been submitted to the Director for consideration, awareness, and approval.

G. Michael Staley

Interim Executive Director of Transit

City of Detroit

Date

## Introduction

The Federal Transit Administration (FTA) requires transit agencies that receive federal funding to monitor their systems to ensure equitably distributed services in compliance with Title VI of the Civil Rights Act of 1964. To certify performance compliance, an equity analysis on major service changes is required to determine any disparate impact on minority populations or disproportionate burden on low-income populations.

The Detroit Department of Transportation (DDOT) defines a major service change as a modification meeting one or more of the following conditions:

- New coverage area that is more than 0.2 miles from the original route.
- A new route (excluding numbering/rebranding).
- An elimination of a route (excluding numbering/rebranding).
- An extension or shortening of a route by 0.2 miles or more.
- A 20 percent or greater change in revenue miles or hours.
- A change in service days on a route.
- A change in service span on a route greater than 2 hours.
- A change in headway greater than 15 minutes.

For DDOT's January 2024 service change, no routes were added or eliminated, nor were any geographically changed, but revenue hours and miles were altered. Therefore, an equity analysis must be performed. This document outlines the methodology used to determine impact on vulnerable populations and summarizes the results of the January 2024 service change.

## Methodology

### 1: Identify Routes Receiving a Major Service Change

Because revenue hours and miles were altered on several routes, the percent change of each must be identified. Current and new revenue hours and miles for each route were gathered and the percent difference of each was calculated. Table 1 below shows the percent change in weekly revenue hours and miles for each route, and whether a route is classified as minority or low-income based on its percentage through minority and low-income tracts (covered in Step 2). Between July 2023 and January 2024, only Route 9 Jefferson has experienced a major service change (due to the implementation of Bus Rapid Transit).

*Table 1: Revenue Hour and Mile Changes by Route and Route Classification*

Route	Weekly Change in		Major Service Change	Minority Route	Low-Income Route
	Hours	Miles			
1 Vernor	0.00%	0.00%	NO	NO	YES
2 Michigan	0.00%	0.00%	NO	YES	YES
3 Grand River	1.59%	1.52%	NO	YES	YES
4 Woodward	0.00%	0.00%	NO	YES	YES
5 Van Dyke-Lafayette	0.00%	0.00%	NO	YES	YES

Route	Weekly Change in		Major Service Change	Minority	Low-Income
	Hours	Miles		Route	Route
6 Gratiot	0.00%	0.00%	NO	YES	YES
7 Seven Mile	2.00%	1.88%	NO	YES	YES
8 Warren	0.00%	0.00%	NO	YES	YES
9 Jefferson	77.60%	77.25%	YES	YES	YES
10 Greenfield	0.00%	0.00%	NO	YES	YES
11 Clairmount	0.00%	0.00%	NO	YES	YES
12 Conant	0.00%	0.00%	NO	YES	YES
13 Conner	4.52%	4.55%	NO	YES	YES
15 Chicago-Davison	2.82%	2.63%	NO	YES	YES
16 Dexter	3.67%	3.42%	NO	YES	YES
17 Eight Mile	0.00%	0.00%	NO	YES	YES
18 Fenkell	1.77%	1.85%	NO	YES	YES
19 Fort	4.34%	4.31%	NO	NO	YES
23 Hamilton	0.00%	0.00%	NO	YES	YES
27 Joy	4.40%	4.46%	NO	YES	YES
29 Linwood	0.00%	0.00%	NO	YES	YES
30 Livernois	0.00%	0.00%	NO	YES	YES
31 Mack	0.00%	0.00%	NO	YES	YES
32 McNichols	0.00%	0.00%	NO	YES	YES
38 Plymouth	0.00%	0.00%	NO	YES	YES
39 Puritan	0.00%	0.00%	NO	YES	YES
40 Russell	0.00%	0.00%	NO	YES	YES
41 Schaefer	0.00%	0.00%	NO	YES	YES
42 Mid-City Loop	0.00%	0.00%	NO	YES	YES
43 Schoolcraft	0.00%	0.00%	NO	YES	YES
46 Southfield	0.00%	0.00%	NO	YES	YES
47 Tireman	0.00%	0.00%	NO	YES	YES
52 Chene	0.00%	0.00%	NO	YES	YES
54 Wyoming	0.00%	0.00%	NO	YES	YES
60 Evergreen	0.61%	0.69%	NO	YES	YES
67 Cadillac-Harper	3.02%	3.01%	NO	YES	YES
68 Chalmers	0.00%	0.00%	NO	YES	YES

## 2: Identify Routes Serving Minority and Low-Income Populations

To determine if the service changes affect vulnerable populations, routes that serve above-the-average-threshold minority and low-income tracts need to be identified. Several steps are taken to determine these routes:

- The service area must be defined.* The DDOT service area is currently defined as tracts within one half-mile of all DDOT bus routes.

- b. *Minority and Low-Income Populations must be defined.* DDOT utilizes U.S. Census Bureau data as reported by American Community Survey (ACS). 2021 ACS data was used for this analysis. All citizens not defined under the “white only” race/ethnicity classification are considered minority. Households reported below the federal poverty line are considered low-income.
- c. *Determine the Service Area Averages for Low-Income and Minority Populations.* The service area’s minority population and low-income population are divided by the total population to find the system’s average for each. 68 percent of the DDOT service area population was calculated as minority and 24 percent as low-income. These are the thresholds.
- d. *Map Service Area Tracts Above or Below the Threshold.* The percentage of minority and low-income populations for each individual service area tract are calculated and compared to the service area averages. The tracts are then mapped on the basis of minority vs. non-minority (see Figure 1 below), and low-income vs. higher-income (see Figure 2 below).

Figure 1: Title VI Classified Minority Tracts and DDOT Service Routes

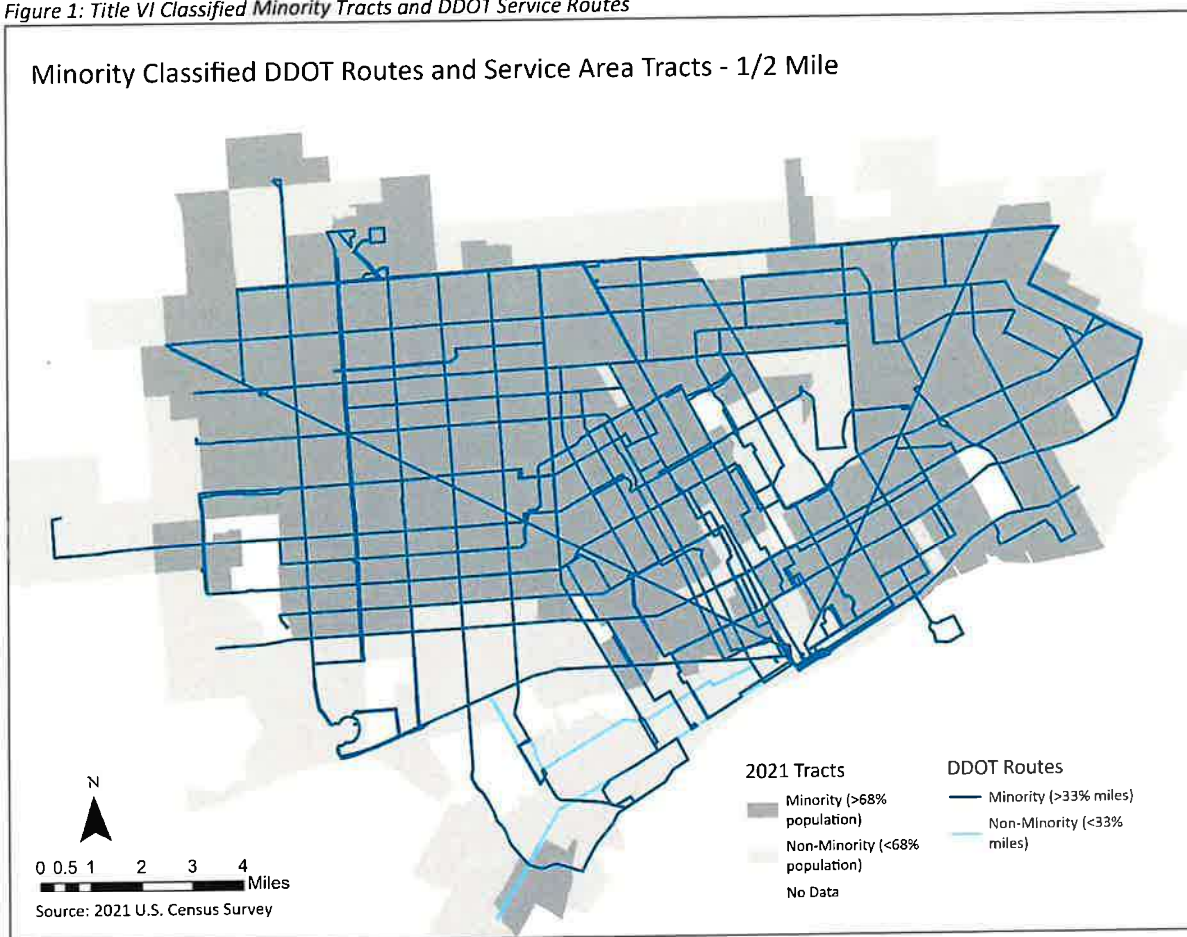
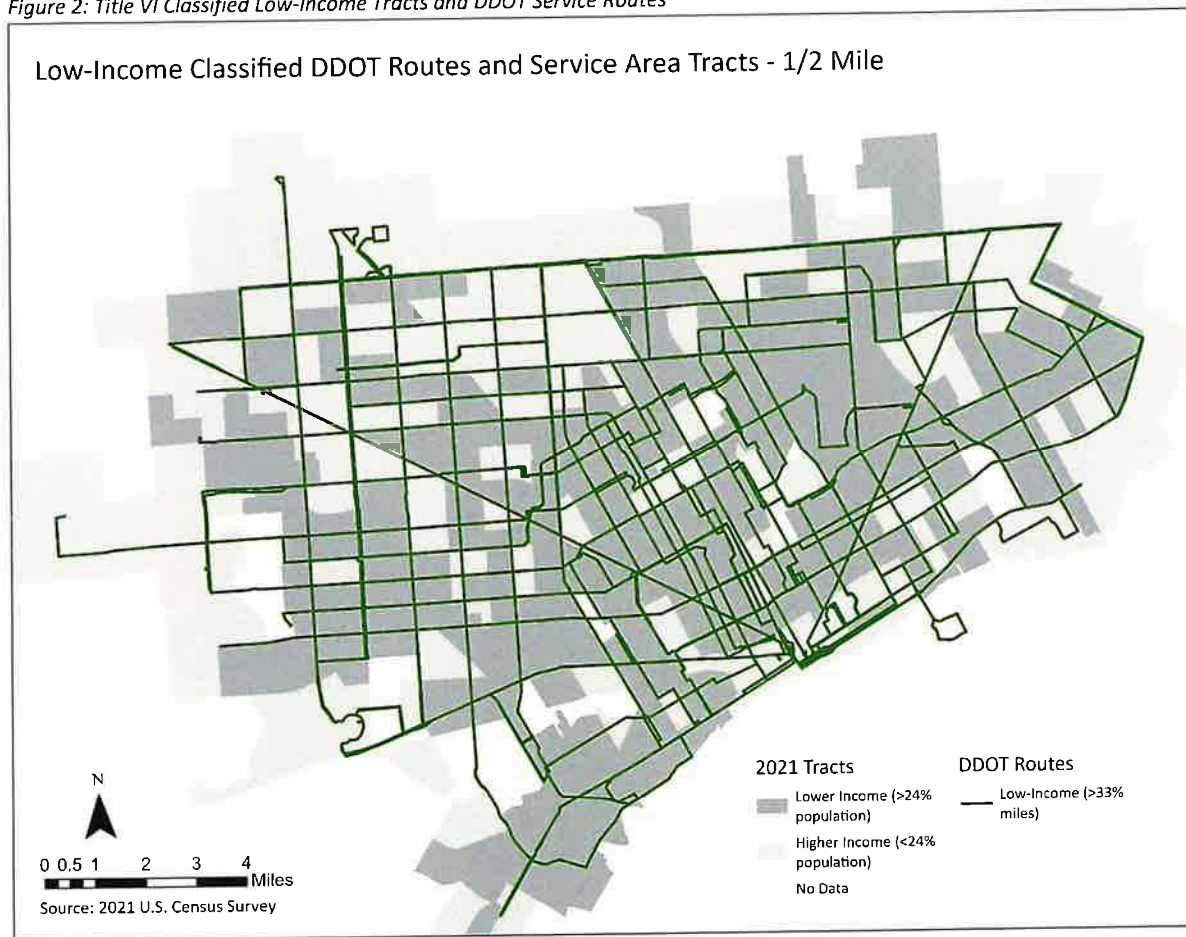




Figure 2: Title VI Classified Low-Income Tracts and DDOT Service Routes



- e. *Identify the Minority and Low-Income Bus Routes.* The service area maps are then used to determine which DDOT bus routes travel through at least 33 percent minority or low-income classified tracts. Those that do are considered minority or low-income routes, respectively. Minority and low-income tracts are distributed throughout the service area, therefore all but two routes serve greater than a third minority tracts, and all serve more than a third low-income tracts. Route classifications are shown above in Figure 1 and Figure 2 and referenced back in Table 1. The percentage of each route's miles through minority and low-income tracts can be found in Table 2 below.

Table 2: DDOT Minority and Low-Income Route Percentages and Classifications

Route	Total Length	In Minority Tracts			In Low Income Tracts		
		Length	%	Is Minority	Length	%	Is Low-Income
1 Vernor	17.11	4.20	24.56%	No	15.16	88.62%	Yes
2 Michigan	21.13	8.79	41.59%	Yes	16.67	78.91%	Yes
3 Grand River	29.51	27.79	94.15%	Yes	27.10	91.82%	Yes
4 Woodward	17.68	16.89	95.51%	Yes	16.89	95.51%	Yes
5 Van Dyke-Lafayette	22.69	21.02	92.65%	Yes	21.02	92.65%	Yes
6 Gratiot	21.07	19.20	91.13%	Yes	17.65	83.79%	Yes

Route	Total Length	In Minority Tracts			In Low Income Tracts		
		Length	%	Is Minority	Length	%	Is Low-Income
7 Seven Mile	39.84	39.84	100.00%	Yes	35.01	87.87%	Yes
8 Warren	40.36	36.88	91.37%	Yes	40.36	100.00%	Yes
9 Jefferson	14.89	12.77	85.77%	Yes	12.77	85.77%	Yes
10 Greenfield	26.12	19.05	72.94%	Yes	21.96	84.06%	Yes
11 Clairmount	30.61	29.11	95.10%	Yes	30.61	100.00%	Yes
12 Conant	23.84	21.33	89.46%	Yes	22.10	92.69%	Yes
13 Conner	16.13	16.13	100.00%	Yes	16.13	100.00%	Yes
15 Chicago-Davison	25.81	25.81	100.00%	Yes	25.81	100.00%	Yes
16 Dexter	37.66	36.63	97.25%	Yes	34.86	92.56%	Yes
17 Eight Mile	48.30	48.30	100.00%	Yes	38.58	79.87%	Yes
18 Fenkell	30.33	30.33	100.00%	Yes	30.33	100.00%	Yes
19 Fort	16.80	5.32	31.64%	No	14.82	88.20%	Yes
23 Hamilton	22.53	22.53	100.00%	Yes	22.53	100.00%	Yes
27 Joy	31.64	26.50	83.77%	Yes	26.54	83.89%	Yes
29 Linwood	20.00	17.78	88.87%	Yes	17.78	88.87%	Yes
30 Livernois	29.72	22.06	74.24%	Yes	25.67	86.39%	Yes
31 Mack	22.19	22.13	99.70%	Yes	22.13	99.70%	Yes
32 McNichols	48.37	48.37	100.00%	Yes	48.37	100.00%	Yes
38 Plymouth	41.85	36.39	86.95%	Yes	32.63	77.97%	Yes
39 Puritan	14.72	14.72	100.00%	Yes	14.72	100.00%	Yes
40 Russell	28.16	26.29	93.38%	Yes	26.29	93.38%	Yes
41 Schaefer	27.64	19.11	69.14%	Yes	25.57	92.53%	Yes
42 Mid-City Loop	12.68	12.68	100.00%	Yes	12.68	100.00%	Yes
43 Schoolcraft	23.17	23.17	100.00%	Yes	20.77	89.64%	Yes
46 Southfield	24.96	19.62	78.59%	Yes	20.14	80.67%	Yes
47 Tireman	23.52	23.52	100.00%	Yes	23.52	100.00%	Yes
52 Chene	25.38	21.17	83.41%	Yes	23.71	93.43%	Yes
54 Wyoming	31.09	19.35	62.21%	Yes	26.40	84.89%	Yes
60 Evergreen	23.45	19.35	82.52%	Yes	16.77	71.54%	Yes
67 Cadillac-Harper	25.71	23.78	92.47%	Yes	23.78	92.47%	Yes
68 Chalmers	18.65	18.65	100.00%	Yes	18.47	99.06%	Yes

Source: DDOT Service Development and Scheduling Division, November 2023

### 3: Determine Disparate Impact or Disproportionate Burden

After classifying changing routes, the benefits and/or disadvantages on vulnerable populations must be identified. DDOT's Title VI policy states, "A major service change to the bus system will be deemed to have a disparate impact/disproportionate burden if 20 percent or more of the affected service falls in tracts with minority/low-income populations higher than the DDOT service area average" and, "The impact on these vulnerable populations should be no less than 20 percent of the impact on non-

vulnerable populations.” Table 3 below shows the hour and mile comparisons between route classifications. Overall, minority and low-income routes are seeing an increase of over 75 percent of their original revenue hours and revenue miles, while non-minority and higher-income routes will see no changes.

*Table 3: Major Service Change Impacts by Route Classifications*

Major Service Change Route Classifications	Weekly Change in Revenue	
	Hours	Miles
All Routes	77.60%	77.25%
Minority Routes	77.60%	77.25%
Non-Minority Routes	0%	0%
Low-Income Routes	77.60%	77.25%
Higher-Income Routes	0%	0%

## Discussion

As the only route receiving a major service change, Route 9 Jefferson, is classified as a minority and a low-income route, non-minority and higher-income routes are not affected in any way. The large increase in revenue hours and miles creates a positive impact on both vulnerable populations according to DDOT’s Title VI policy standards. Therefore, there is no disparate impact on minority populations or disproportionate burden on low-income populations and no further evaluation is necessary.

## Public Engagement

DDOT held a virtual Notice of Public Hearing on November 16, 2023 to notify participants of and receive feedback on the January service changes. DDOT also accepted comments via post and email until December 15, 2023. All comments were reviewed and taken into consideration for the plan. Prior to the November Notice of Public Hearing event, the January service changes were available for viewing on the DDOT website and social media platforms, and flyers providing information on the changes were distributed to the public at DDOT transit facilities and other relevant locations.

### Online Public Comments

**Roland Lawrence:** My suggestion and comment on the - Public Hearing for Proposed DDOT Service Changes: There needs to be multiple interconnection buses which should help make using public transportation more manageable and attractive.

### Virtual Public Meeting Comments

**Thomas Yazbeck:** I don't want to raise my hand, but I appreciate the January service changes and praise DDOT for being bold & imaginative with Jefferson. I'm confident that you guys can make this work!

**Lisa Franklin:** Please consider our children.

**Renard Monczunski (he/him):** Hi, my name is Renard Monczunski. I'm a resident of the city of Detroit and represent the Detroit People's Platform Transit Justice Team. I want to be on record as a representative transit team to say that these changes in January, while are encouraging, and it sounds like this is part of the first part of the DDOT Reimagined being implemented, we want DDOT to continue to be very vocal and transparent with the public as they continue to implement DDOT Reimagined, and I do think that the changes on the Jefferson, and especially with Dexter, which I personally use are helpful. I don't see how the Fenkell bus, beginning 45 minutes frequency at the start of weekday, then after 8am, is going to be helpful when the Fenkell bus doesn't show up in the first part of the schedule, anyway, and it's late. So, I'm not sure how that's going to work out. Of course, I'm going to speak in support of the peak period trips for routes 3, 7, 13, 15, 19, 27, 60, 67. Those are some neglected routes. However, I just want to be on record to say this, too. I don't see how any of these time frequencies are going to be promised when you're short over a hundred drivers, and what is changing between now and December that we probably don't know about that you're able to promise this frequency. I'm not sure if this is a good timing for this because earlier this year, you guaranteed Dexter 20-minute headways, and you couldn't even accomplish that. So my question is, how are you going to be able to accomplish these service changes for January, when you don't have enough drivers? I just don't understand that. And then, with the Jefferson number 9, I really think those changes are positive. I just want to bring attention to these bus islands and the double-lane bike lanes. I've seen cars driving through those, so we need to consider the safety of our passengers in the system. Thank you.

**Michael Cunningham:** I am in agreement with Mr. Renard Monczunski, y'all don't have enough drivers. How can you all promise this? This is not good time to do this. I'm out in the field all over the city. These improvements are greatly needed but you don't have the bus drivers right now. How is it possible?

**Lukas Lasecki:** I'm a resident of Farmington Hills, and a regular DDOT rider. To begin, I'd like to express my support for these service improvements. It will absolutely be helpful to have these additional frequencies. I do have a couple of concerns. For one, the bulk of what was said about peak period additional trips. I think that wording is sort of vague and doesn't really accurately describe what's being done here. Peak period additional trips on Evergreen could mean it's being bumped up to every 20 minutes or every 15 minutes, even every 10, at certain times. But you just say we're throwing more buses at this route, doesn't really give us much information about when or how many, or what impact that's going to have on service.



And I'd like to echo as well the concerns of the prior two commenters that we don't really have much of an assurance that you will be able to fulfill these changes since you're already struggling with the operator shortage to fulfill the service you're already promising. If you're able to make this work in practice, it will absolutely be great, but it's going to be concerning if you're promising additional service that you're not able to deliver on. And my final concern that I'd like to raise is, as much as the Jefferson amenities will be nice, I feel like it may be better to prioritize restoring basic amenities to other places rather than improving amenities that already exist on Jefferson. Probably more than half of DDOT stops are not accessible to disabled riders, which is a massive problem that needs to be addressed and isn't sufficiently being addressed. On Greenfield, most of the stops don't have benches or shelters. Basic amenities to some places need to be addressed before really good amenities become a priority. Thank you for your time.

**James Sobolewski:** I'm a resident of Detroit. I would speak in support of the frequency, the improvements. I definitely share the concerns with the other commenters. In that it's very important to prioritize reliability in the schedule. So, we need to make sure that what we're promising out there to the public is what's being delivered, and that comes with having the adequate number of drivers. So I'm looking forward that. One specific note on Jefferson. So, I commonly and I have observed a number of other riders doing this as well, the Maryland stop that actually passes Alter in Grosse Pointe is a big transfer point between the DDOT system and the SMART system. I know the diagram that was shown here looks like that's maintained, and the bus will actually make that U-turn where it has the layover on Jefferson and Maryland, but I want to be on record to saying I would like to see that transfer point and that stop at Maryland maintained. So people that who are either continuing on SMART system or getting off in Grosse Pointe can continue to do that.

**Rochella Stewart:** Good evening, everyone. My name is Rochelle Stewart. I'm with the transit justice team. It is greatly appreciated that the Grand River would have more routes, and Dexter, but we're at a time where it's wintertime and we really don't have enough shelters that's protecting the elderly and ADA community that's out there. And even the students. It's been said, students are not getting home on time, not arriving at school on time. People are losing jobs. Please if you're going to put this into play, hopefully, like everybody is saying, we have enough drivers... which we don't have at this time. Hopefully, by January, we can. But I can't see that happening in less than 2 months but if it is possible this will be something that will be greatly appreciated. The passengers need it. They're waiting too long. Some of the other routes need to be updated and get more frequency, too. Hopefully we can get this done. DDOT had promised a lot of things. This seemed like it's kind of far stretched to happen in January, but I'm hoping they can and thank you for considering these routes, to add more to it, more frequency, but I'm going to wait to see and please put some more shelters up, because people are standing out there with no protection from the snow, the rain, the coldness of this winter. Thank you. And you have a blessed evening.

**Alan Rosetto:** My name is Alan Rosetto. I'm a handicapped individual that uses an electric wheelchair to travel around the city and I've only been here for a couple of years. I spent most of my first couple of years in a nursing home and doing rehabilitation and now I'm out and using DDOT services quite a bit. I was also using MetroLift quite a bit until my wheelchair was actually damaged by one of their drivers, and I had to send it in and not have my chair for a full month while it was repaired. So, I started using DDOT busing system and I'm finding several issues with that. A lot of it is with the drivers themselves. They'll pull up to a stop and they'll explain to me that their bus is too full, and I can clearly see inside of

the bus, through the windows that the bus is half full, less than half full. There may be people in the seats that are used for seniors and handicapped equipment, and they actually get up and they'll lift the seats up for the driver and move to the back, and the driver will still explain that his bus is too full, go sit down in his seat and drive away. This has happened on more than one occasion. I've also had issues where the equipment didn't work properly. Whether the driver was not using it correctly or it was damaged in some way I don't know, but the lift wouldn't come down and I wasn't able to get on the bus then. I've missed 6 doctors' appointments this year alone because of drivers not wanting to pick me up or just driving right by me or because routes were cancelled because they didn't have a driver for that particular time for me. It's beginning to get really frustrating. I had a specialist for multiple sclerosis that I was supposed to see, and now I have to pay \$75 if I want to get an appointment with that doctor because I missed the appointment that I had with them.

**Claire Nowak-Boyd** (she/her): I am Claire Nowak-Boyd and I'll just say I agree with basically all the other commenters that I'm really excited to see new service. It was really great to hear the words "service changes" and read the announcement and go, "Oh, oh, it's the good kind like." It's awesome to see you grow. I share everyone else's concern about DDOT's ability to run this service when there continues to be severely insufficient driver pay to have enough drivers to make the buses show up so that you know everyone else can get to their job. It's a long-term thing and I'll also say just again, I see the changes you guys are trying to make and the actions you try to take, but there just seems to be really chronic problems with DDOT's treatment of wheelchair users, whether it's even letting them on board, as that commenter noted. Make sure that bus stops are not parked in... People who need transit the most, need it to actually work and be accessible to them. So thanks as always for listening to us.

**Lisa Franklin**: Yes, good evening. This is Lisa Franklin from Warriors on Wheels and I'm just really sorry that that happened to the gentleman who was a wheelchair user. I see all of the changes that you all are proposing and that seems like an awful lot of resources and money going into Jefferson, which just travels down the waterfront, down Jefferson, and I'd like to see more done to some of the routes and service that go down through the neighborhoods. Woodward, Dexter, Greenfield, all of those routes that need attention for the people in the neighborhoods. Now we've talked for at length about training the drivers and I think that some of those resources can go into making sure that the drivers understand the ridership and the needs of the ridership. There used to be a time where if a wheelchair user was left out at the bus stop, that the driver was supposed to call in to dispatch to let them know that. A person that needs transportation and is a power wheelchair user, a manual wheelchair user, on a walker, on a cane and is left behind – dispatch should know about that, and departments should know about that. So again those changes on Jefferson, I love to see any type of changes, but I think that some of those resources could be put into the neighborhoods.

**Marguerite Maddox**: My comment would be the Dexter and the Crosstown and the Greenfield and Southfield and Evergreen and the Jefferson is nice, but what about all the other buses because I... main bus lines Woodward, Gratiot, all of them, but why not like Lisa said, we need to find other resources.