

City of Fresno Department of Transportation/Fresno Area Express 2025-2026 Service Changes



### Title VI Service Equity Analysis

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## Table of Contents

Overview
Relevant Policies
Proposed Changes
New Route 297
Summary of Public Participation & Outreach
Service Equity Analysis
Data Sources10
American Community Survey10
2024 FAX On-Board Survey10
Major Service Change Analysis12
Geographic/Population Analysis12
Ridership Analysis13
Mitigation Measures
Appendix
Appendix A15

# Overview

In compliance with Title VI of the Civil Rights Act of 1964, the Federal Transit Administration (FTA) requires all transit agencies that receive federal funding to monitor the performance of their systems, ensuring services are made available and/or distributed equitably. One component of ensuring compliance is performing an equity analysis for all fare changes and any major service changes to determine its impact on minority (race, color, or national origin) and low-income populations.

The City of Fresno's department of Transportation operates and administers Fresno Area Express (FAX) which is the primary fixed-route transit operator in Fresno, California. FAX has proposed changes to five of its routes and is introducing a new route, Route 29.

This Title VI analysis will:

- Determine whether the proposed route changes constitute a major service change or not,
- Evaluate how any major service changes may impact low-income and minority populations, and
- Identify strategies to avoid, minimize, or mitigate any disproportionate burdens, disparate impacts, or any potentially negative outcomes.

## **Relevant Policies**

This FAX service equity analysis was completed in accordance with FTA regulations outlined in FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients." The circular requires this analysis to ensure or minimize any disparate impact on minority populations or disproportionate burden on low-income populations.

#### **Disparate Impact Definition**

Refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks 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. (FTA C 4702.1B, Chap. I-2)

#### Disproportionate Burden Definition

Refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable. (FTA C 4702.1B, Chap. I-2)

Each transit agency is responsible for establishing a threshold for what constitutes a "major" service change as well as what differential is considered a disparate impact or disproportionate burden.

#### Major Service Change

In 2022, FAX completed its Triennial Title VI Program. Per FAX's Title VI policy, a major service change is any service change that:

- Adds or removes 25 percent or more of revenue miles on any route, or
- Adds or removes 25 percent or more of revenue hours on any route.

#### **Disparate Impact Policy**

A disparate impact exists if a major service change, fare change, or fare media change requires a minority population to bear adverse effects by 20 percent or more than the adverse effects borne by the general population in the affected area.

#### **Disproportionate Burden Policy**

A disproportionate burden exists if a major service change, fare change, or fare media change requires a low-income population to bear adverse effects by 20 percent or more than the adverse effects borne by the general population in the affected area.

FAX has also recently completed four other Title VI analyses, including for a series of service changes in 2020, an analysis of a fare reduction in 2021, an analysis of a pilot program consisting of free fares for Reduced Fare passengers subsidized by Kaiser in 2022, an analysis of reduced fares for students in 2022 and an analysis of service improvements in 2023. This Title VI analysis will apply Title VI policies in a manner consistent with these earlier analyses.

# **Proposed Changes**

FAX is continually evaluating its service to improve the level of service offered to customers. FAX has proposed changes to five routes and is introducing a new route, Route 29. Table 1**Error! Reference source not found.** summarizes the proposed service changes. Map 1 and Map 2 show FAX's network before and after the proposed changes, respectively.



Route	Description of Revised Service	Origin and Destination of Revised Serviced
Route 1 – FAX Q	Evening service increased to 30 minutes from 60 minutes Weekdays and Saturdays	No change
Route 9 - Shaw	Evening service increased to 30 minutes from 60 minutes Weekdays and Saturdays	No change
Route 28 Department of Social Services/Manchester/ West Fresno	Evening service increased to 30 minutes from 60 minutes Weekdays and Saturdays	No change
Route 29 – Church Ave	New service along Church Avenue from Walnut Ave to Fowler Ave	From S Walnut Ave and E Cesar Chavez Blvd to E Jensen Ave and S Fowler Ave
Route 32 – Fresno St	Evening service increased to 30 minutes from 60 minutes Weekdays and Saturdays	No change
Route 38 - Cedar	Evening service increased to every to every 30 minutes from 60 minutes on Weekdays and Saturdays. Route alignment in the evenings will extend from Shaw Ave to River Park Shopping Center. Route 38 will also no longer deviate to serve Hilton Center and will continue on Walnut.	Evenings service will extend from Shaw Ave and Cedar Ave north to the River Park Shopping Center.





Map 2 - Fresno Area Express Proposed Network



### New Route 29

Route 29 will launch with a temporary alignment during High-Speed Rail construction along Golden State Boulevard. During this interim period, buses will detour from Church Avenue to operate along Jensen Avenue between Golden State Boulevard and Cedar Avenue. Once High-Speed Rail construction is complete, Route 29 will transition to its final alignment, which will operate exclusively along Church Avenue with no deviation to Jensen Avenue. Map 3 shows the proposed initial and final alignments of Route 29. Both alignments were evaluated.



Map 3 - Proposed Route, Final and Detour Alignments

# Summary of Public Participation & Outreach

In May 2025, FAX launched a comprehensive public outreach campaign to inform the community about the upcoming launch of Route 29 (Church Ave.) and the expansion of night service hours for Routes 1, 9, 28, 32, and 38. This expansion includes a route extension for Route 38 from Shaw Ave. to River Park.

The outreach effort featured nine events: two virtual sessions, five informal pop-up events at bus stops along Church Ave. and key transit centers, and two workshops held at schools located at opposite ends of Church Ave.

Each event provided a range of educational materials at interactive stations to encourage community engagement. Maps highlighted both the High-Speed Rail detour and the future alignments for Route 29, as well as the proposed changes to the night service for Routes 1, 9, 28, 32, and 38. Attendees had the opportunity to provide feedback, identify key destinations such as their homes, and work on interactive maps. All feedback collected from the community was positive, with no requests for modifications.

Information about the proposed changes, including Route 29 and the extended night service, was prominently displayed on the FAX website. Flyers, available in both English and Spanish, were distributed through mail, in-person at events, inside FAX buses, on social media, and via the FAX newsletter. Appendix A contains all the public outreach materials produced for these proposed service changes.

Event Dates were as follows:

5/5 Church & Chestnut	9:00 – 10:30 AM (Pop <b>Up</b> )
5/6 Cedar & Ventura	7:00 – 8:30 AM (Pop <b>Up</b> )
5/6 Manchester Transit Center	10:30 – 12:00 PM (Pop <b>Up</b> )
5/7 Courthouse Park	8:30 – 10:00 AM (Pop <b>Up</b> )
5/8 Church & Elm	8:30 – 10:00 AM (Pop <b>Up</b> )
5/13 West Fresno Center	4:30-8:00 PM (Outreach <i>Event</i> )
5/15 Sequoia Elementary	5:00-8:00 PM (Outreach <i>Event</i> )
5/29 Zoom Meeting	10:30-11:30 AM (Virtual <b>Event</b> )
5/29 Zoom Meeting	6:30-7:30 PM (Virtual <b>Event</b> )

## Service Equity Analysis

The service equity analysis has three key parts:

- 1. First, proposed service changes are analyzed to determine if those changes meet the major service change threshold as defined by FAX's Title VI policy.
- 2. If any of the proposed service changes meet the major service change threshold, then the proposed route changes are analyzed to determine if those changes create a disparate impact or disproportionate burden according to FAX's Title VI policy.
- 3. If a disparate impact or disproportionate burden is found, then mitigation measures will be recommended for the proposed service changes so that they no longer create a disparate impact or disproportionate burden.

Figure 1illustrates FAX's service equity analysis process. Because of the combination of proposed changes, FAX determined that analyzing all proposed changes, regardless of whether they meet policy thresholds, would provide consistent information for the decision-making process related to the proposed network changes.





As outlined in the FTA Circular, transit agencies should analyze available data for the general population (U.S. Census or American Community Survey data) or data specific to system ridership (survey data). To provide the most comprehensive findings, both population and ridership data were analyzed and are summarized in this document. (Care was taken not to "mix and match" in comparative analysis—always comparing ridership to ridership and population to population, as noted in FTA C 4702.1B, Chap. IV-15.)

### **Data Sources**

### American Community Survey

2023 ACS five-year estimates provide census block group-level population data for the geographybased analysis.

- C17002: Ratio of Income to Poverty Level in the Past 12 Months
- B03002: Hispanic or Latino Origin by Race

FAX defines low-income as at or below 150 percent of the federal poverty line. Individuals who reported in the ACS that their income over the previous 12 months fell below 150 percent of the federal poverty line were defined as low-income for the geographic analysis.

For purposes of this analysis, the following origin by race categories are defined as minority:

- Black or African American alone
- American Indian or Alaska Native alone
- Asian alone
- Native Hawaiian or Other Pacific Islander alone
- Hispanic or Latino
- "Other" race alone
- Two or more races

#### 2024 FAX On-Board Survey

The following questions from the 2024 FAX On-Board Survey were analyzed for the service equity analysis:

- Route: Which bus route was the respondent riding.
- **Ethnicity:** What race and/or ethnicity did the respondent identify as. The choices were:
  - o Hispanic
  - o White/Caucasian
  - o African American/Black
  - Asian/Southeast Asian
  - o American Indian
  - Pacific Islander
  - o Middle Easterner
  - o Mixed Ethnicities
  - o Other
  - Don't Know/Refused

- Household Income: Reported income of respondent's household. Choices were:
  - o Less than \$10,000
  - o \$10,000 \$19,999
  - o **\$20,000 \$29,999**
  - o **\$30,000 \$39,999**
  - o **\$40,000 \$49,999**
  - o **\$50,000 \$59,999**
  - o **\$60,000 \$74,999**
  - o **\$75,000 \$99,999**
  - o \$100,000 or more
  - o Refused

All respondents who indicated a race/ethnicity other than White/Caucasian were considered a minority for purposes of this analysis. If a respondent indicated more than one race/ethnicity, they were considered a minority. Furthermore, if a respondent indicated "other," they were considered a minority. Records where the respondent did not answer the race/ethnicity question were excluded from the disparate impact analysis, as their minority status could not be determined.

FAX's definition of low-income is any person whose median household income is at or below 150 percent of the federal poverty line. The federal poverty guidelines issued by the U.S. Department of Health and Human Services were used as the basis for determining low-income status. The 2024 On-Board Survey did not ask participants about the number of persons in their family or household, so this analysis assumes that respondents had a household the size of an average Fresno County household, three persons. The average household size was compared with the average household size found in the 2022 survey which did ask participants for household size, which was also three, which leads us to believe that that was an appropriate assumption to make. Using the average household size of three, a participant was considered in poverty if they responded that their income was less than \$39,999.

Persons in Family/Household	Poverty Guideline	150% of Poverty Guideline
1	\$15,650	\$23,475
2	\$21,150	\$31,725
3	\$26,650	\$39,975
4	\$32,150	\$48,225
5	\$37,650	\$56,475
6	\$43,150	\$64,725
7	\$48,650	\$72,975
8	\$54,150	\$81,225

Table 2 - 2025 Poverty Guidelines for the 48 Contiguous States and D.C.

## Major Service Change Analysis

The first step in determining if the proposed service changes would cause a disparate impact or disproportionate burden is determining which proposed changes, if any, constitute a major service change under FAX's policy. To do so, revenue miles and revenue hours were compared for each route in the existing and proposed network in Table 3. Routes with a 25 percent or greater change in revenue miles or revenue hours from the existing network to the proposed network are considered a major service change.

Route	Revei	Revenue Hours (Annual)		Revenue Miles (Annual)			Major
	Existing	Proposed	Percent Change	Existing	Proposed	Percent Change	Change?
1	69,625	71,939	3.3%	766,439	787,021	2.7%	No
9	31,623	32,327	2.2%	326,939	339,346	3.8%	No
28	36,647	37,855	3.3%	381,413	391,670	2.7%	No
29 (Detour)	-	14,232	100.0%	-	194,118	100.0%	Yes
29 (Final)	-	13,271	100.0%	-	176,373	100.0%	Yes
32	27,998	28,450	1.6%	272,867	276,016	1.2%	No
38	50,266	51,270	2.0%	621,577	628,099	1.0%	No

Only the introduction of Route 29 is classified as a major service change. Increases in evening frequencies of Routes 1, 9, 28, 32 and 38 increase annual revenue hours and revenue miles below the major service change threshold and do not require further analysis for disparate impacts or disproportionate burden.

The introduction of Route 29 is classified as a major service change and must be analyzed to determine if the introduction of this route poses a disparate impact on minority populations or a disproportionate burden on low-income populations.

## Geographic/Population Analysis

This analysis evaluates the proposed Route 29 service change—the only major service change planned—against Title VI requirements to ensure equitable service provision across demographic groups. We assess potential disparate impacts on minority populations and disproportionate burdens on low-income populations by comparing demographics within the proposed service area to systemwide averages.

This analysis examines populations residing within a half-mile radius of proposed Route 29 compared to the overall system service area. Following FAX's Title VI policy, a finding of disparate impact or disproportionate burden occurs when the difference between the route-level and system-level demographic percentages exceeds 20 percent.

The percentage of minority residents served by proposed Route 29 is 16 percent higher than the system average (see Table 4). Since Route 29 would serve a greater proportion of minority populations than the system average, no disparate impact is identified for this service change.

Route	Total Population within 1/2 Mile	Percent Minority	Difference	Disparate Impact
29 - Detour	37,600	91%	+16%	No
29 - Final	37,800	91%	+16%	No
Systemwide	518,700	75%		

The percentage of low-income households within the Route 29 service area is five percent higher than the system average for both the Final and Detour routing (see Table 5). As with minority populations, Route 29 would serve a greater proportion of low-income households than the system average, resulting in no disproportionate burden associated with this service change.

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Table 5 - Overall and Population	at or Under 150% of Federal	Poverty Level within	1/2 Mile of Proposed Service

Route	Total Population within 1/2 Mile	Percent Low Income	Difference	Disproportionate Burden
29 - Detour	37,600	40%	+5%	No
29 - Final	37,800	40%	+5%	No
Systemwide	518,700	35%		

### **Ridership Analysis**

While the proposed service changes for Routes 1,9, 28, 32, and 38 do not meet the threshold for "major service changes" under Title VI guidelines, we conducted additional assessment to understand impacts on existing riders. We analyzed data from the 2024 FAX On-Board Survey to evaluate how the proposed evening frequency increases would affect actual transit users, not just potential riders within the service area.

Of the five routes receiving proposed frequency improvements, Routes 1, 9, and 32 serve populations with above-average minority ridership. The remaining two routes serve populations with minority ridership at or below system average. Since all changes involve service increases, they represent a benefit to all affected riders.

Route	Percentage Minority	System Avg % Difference	Route Classification
1	78.8%	4.71%	Minority
9	78.3%	4.23%	Minority
28	63.4%	-10.69%	Non-Minority
32	87.0%	12.85%	Minority
38	71.1%	-2.97%	Non-Minority
Total	74.1%		

Table 6 - Minority Ridership Share by Routes with Proposed Service Changes

Of the five routes receiving proposed frequency improvements, only Route 9 doesn't serve populations with above-average system low-income ridership. Since all changes involve service increase, they represent a benefit to all affected riders.

Table 7 - Low-Income Ridership Share by Routes with Proposed Service Changes

Route	Percent Poverty	System Average Difference	<b>Route Classification</b>
1	84.7%	2.0%	Low-Income
9	58.3%	-24.4%	Non-Low-Income
28	95.1%	12.4%	Low-Income
32	91.3%	8.5%	Low-Income
38	85.6%	2.8%	Low-Income
Total	82.8%		

## **Mitigation Measures**

No mitigation measures are necessary in implementing the proposed service changes. The proposed Route 29 service change provides net positive benefits to minority and low-income populations, with no findings of disparate impact or disproportionate burden according to FAX's established thresholds. The changes in revenue hours and revenue miles associated with increases in evening frequency are not considered major service changes since they did not meet FAX's 25% change threshold and are not required to be analyzed for equity impacts.

# Appendix A: Community Outreach Materials

#### Figure 2: Flyer for May Workshops

Route 29 and Night Service Changes: Workshop Flyer and Mailer in English & Spanish. Mailer sent via US Mail. Flyer posted on social media, Buses and handed out at Pop-up Events.



Figure 3: Social Media Posts for May Workshops

Route 29 and Night Service Changes: Virtual Workshop Reminders Posted to social media.





### Figure 4: Outreach Maps



### Route 29 & Night Service Changes Workshop Materials



