



2020 TITLE VI DOCUMENTATION
FOR THE
FEDERAL TRANSIT ADMINISTRATION

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Contact: Maxwell Dillivan, AICP
Senior Planner
The Rapid (Interurban Transit Partnership)
Email: mdillivan@ridetherapid.org
Phone: (616) 774-1159

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SECTION I. INTRODUCTION

Title VI of the Civil Rights Act of 1964 ensures that “no person in the United States shall, on the basis of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” The Rapid is fully committed to the Title VI Assurance policies set forth by the Department of Transportation. These objectives work to ensure that FTA-assisted benefits and related services are made available and are equitably distributed without regard to race, color, or national origin. It is critical for The Rapid to maintain compliance with FTA Title VI policies to qualify for Federal funding.

The Interurban Transit Partnership, known as The Rapid, is the public transportation provider for the metropolitan Grand Rapids region. It is organized and operates under Michigan Public Act 196 of 1986. The activities of The Rapid are overseen by a 15-member board of directors that represents the six municipalities in The Rapid’s service area: East Grand Rapids, Grand Rapids, Grandville, Kentwood, Walker, and Wyoming. The ITP board is comprised of individuals who are selected to serve as a member of the board by the mayors of each of the six member cities. Further, membership of all official sub-committees of ITP are chosen by the board.

SECTION II. DATA COLLECTION AND REPORTING REQUIREMENTS

A. Civil Rights Complaints

There are no active lawsuits naming the Interurban Transit Partnership-The Rapid that alleges discrimination on the basis of race, color, or national origin with respect to service or other transit benefits.

B. Pending Grant Applications

There will be three FY 2021 Applications when the federal apportionments are released. These include:

- Section 5307
- CMAQ
- Section 5339

C. Civil Rights Compliance Reviews

The FTA conducted a Triennial Review of The Rapid in September 2019 and found the agency was in compliance except for one (1) finding which involved providing Title VI Rights Notices displayed in Spanish at all locates the notices are places. This finding has since been addressed.

D. DOT Title VI Assurance

The Rapid is fully committed to the DOT's Title VI Assurance policies.

E. Title VI Submittal

The Rapid's 2017 Title VI report was submitted to the FTA in December 2017 and is set to expire in January 2021. The 2020 Title VI report, once approved by the FTA, will be valid from January 31, 2021 to January 31, 2024.

F. Construction Projects

The Rapid has worked on several construction projects since 2017:

- Construction of a Light Maintenance and Storage Facility at 851 Freeman Ave SW. This project was completed in August 2020. The facility was constructed to

store, maintain, and refuel Laker Line vehicles for the Laker Line Bus Rapid Transit (BRT) service. The project received a Categorical Exclusion (CE) under NEPA in February 2017. A facility site equity analysis was determined to be unnecessary as the site was previously undeveloped (vacant) where no residents or businesses were displaced. The CE as authorized by the FTA cites “impacts of the project are not expected to be high and adverse” and “issues with compliance with FTA Circular 4703.1 are not anticipated.”

- Construction of 20 bus rapid transit platforms along the Laker Line route alignment in tandem with the Laker Line BRT project.
- Reconstruction of the Facilities Department Building at 700 Butterworth Ave SW. This effort included the demolition of the existing structure on the site and the construction of a new office building and more adequate, covered parking areas for equipment and vehicles. Reconstruction of the Butterworth facility did not increase the footprint of the former facility which had existed on the site previously, and therefore, a facility site equity analysis was not required. This project concluded in the Fall of 2022.

SECTION III. TITLE VI NOTIFICATION AND MONITORING

A. Public Notification of Title VI Rights

The Rapid uses a number of methods to ensure the public knows its Title VI rights. The following information appears on The Rapid's webpage, is displayed at our Information Center, on the bus transfer station platforms, and on all Rapid buses:

Notification of Non-Discrimination

The Rapid fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. The Rapid operates without regard to race, color, national origin. Any person who believes him/herself, or any specific class of persons, to be subject to discrimination prohibited by Title VI may by him/herself or by representative file a written complaint with The Rapid. A complaint must be filed no later than 180 days after the date of the alleged discrimination and contain the following information:

- Name, address, and phone number of the Complainant
- Name, address, phone number and relationship of Representative to Complainant (if applicable)
- Basis of complaint (i.e., race, color, national origin)
- Date of alleged discriminatory act(s)
- Date complaint received by the MPO
- A statement of the complaint, including specific details, relevant facts and documentation.

To request additional information about The Rapid's Title VI obligations, please contact our Title VI Coordinator by mail or email:

Mail
Attn: Title VI Coordinator
Planning Department
300 Ellsworth SW
Grand Rapids, MI 49503

Email
titlevi@ridetherapid.org

B. Response to Title VI Complaints

The following is The Rapid's official policy for response to Title VI complaints:

If The Rapid receives a Title VI complaint as described in the Notification of Non-Discrimination, the following process will be followed:

Within fifteen (15) days, The Rapid shall confirm receipt of the complaint and inform the Complainant of the investigation process. Within sixty (60) days—should the complaint have merit—The Rapid shall commence an investigation of the allegation(s). The purpose of an investigation is to determine whether there is a reason to believe that a failure to comply with Title VI of the Civil Rights Act of 1964 has occurred. In addition, The Rapid will render a recommendation for action in a report of findings or resolution. Within ninety (90) days, The Rapid will notify the Complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the Complainant of his/her right to file a formal complaint with the Federal Transit Administration (FTA) Title VI Coordinator if they are dissatisfied with the final decision rendered by The Rapid. The Rapid maintains a log of all Title VI complaints received.

If a probable cause of a discriminatory practice based on race, color, or national origin is found to exist, The Rapid shall endeavor to eliminate said practice by means of a Remedial Action Plan. The Remedial Plan shall include: a list of all corrective actions accepted by the agency; a description of how the corrective action will be implemented; and a written assurance that the agency will implement the accepted corrective action in the manner discussed in the plan. Where attempts to resolve the complaint fail, the complainant shall be notified in writing of his or her right to submit the complaint to the Federal Transit Administration as cited in FTA C4702.1A.

C. Sub-Recipients and Title VI Monitoring

The Rapid has no sub-recipients under Title VI monitoring.

SECTION IV. PUBLIC OUTREACH AND LIMITED ENGLISH PROFICIENCY (LEP) OUTREACH

The DOT Guidance outlines four factors recipients should apply to the various kinds of contracts they have with the public to assess language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity, or service provided by the recipient to the LEP Community.
4. The resources available to The Rapid and overall cost.

This plan uses the recommended four-factor analysis of an individualized assessment considering the four factors outlined above. Each of the following factors is examined to determine the level and extent of language assistance measures required to sufficiently ensure meaningful access to The Rapid services and activities that may affect their quality of life.

For monitoring purposes, the Language Assistance Plan (LAP) as included in this section is reviewed and updated every three years concurrently with the update to the Title VI Plan. The LAP is reviewed for compliance with updated FTA rules and guidelines, to mirror internal Rapid policies and procedures, and to consider effectiveness of strategies.

A. Factor 1: The Proportion, Numbers and Distribution of LEP Persons

Census, State, and Local Population Data

The Rapid's primary service area includes the cities of East Grand Rapids, Grand Rapids, Grandville, Kentwood, Walker, and Wyoming which constitute nearly the entirety of the Grand Rapids Urbanized Area (UA). According to the American Community Survey, there are over 6,000 limited English-speaking households in the Grand Rapids area, or 2.7% of all households in the urbanized area. Given the metro region's recent history of highly-active faith-based refugee re-settlement service organizations, the Grand Rapids area includes a wide variety of distinct language groups originating from all over the world, especially within the City of Kentwood. Of these limited English-speaking households, Spanish-speaking households comprise almost half of Limited English Proficiency households in the service area. Further, all six member communities of The Rapid have Spanish as the largest LEP group. Several neighborhoods within the service area feature a majority-Spanish speaking population, including Southwest Grand Rapids near Grandville and Clyde Park

avenues. The table below details the language groups spoken in The Rapid's primary service area.

Table 1 - Detailed Household Language Spoken by Household Limited English Speaking Status (2018)

	Grand Rapids Urbanized Area	
	Households	Percent
Total Population	231,533	100.0%
English only	201,011	86.8%
Spanish	16,213	7.0%
Limited English-speaking household	2,983	1.3%
Not a limited English-speaking household	13,230	5.7%
French, Haitian, or Cajun	1,019	0.4%
Limited English-speaking household	119	0.1%
Not a limited English-speaking household	900	0.4%
German or other West Germanic languages	1,448	0.6%
Limited English-speaking household	87	0.0%
Not a limited English-speaking household	1,361	0.6%
Russian, Polish, or other Slavic languages	1,439	0.6%
Limited English-speaking household	69	0.0%
Not a limited English-speaking household	1,370	0.6%
Other Indo-European languages	2,051	0.9%
Limited English-speaking household	212	0.1%
Not a limited English-speaking household	1,839	0.8%
Korean	295	0.1%
Limited English-speaking household	169	0.1%
Not a limited English-speaking household	126	0.1%
Chinese (incl. Mandarin, Cantonese)	770	0.3%
Limited English-speaking household	148	0.1%
Not a limited English-speaking household	622	0.3%
Vietnamese	1,526	0.7%
Limited English-speaking household	827	0.4%
Not a limited English-speaking household	699	0.3%
Tagalog (incl. Filipino)	387	0.2%
Limited English-speaking household	42	0.0%
Not a limited English-speaking household	345	0.1%
Other Asian and Pacific Island languages	1,322	0.6%
Limited English-speaking household	572	0.2%
Not a limited English-speaking household	750	0.3%
Arabic	819	0.4%
Limited English-speaking household	0	0.0%
Not a limited English-speaking household	819	0.4%
Other and unspecified languages	3,233	1.4%

Limited English-speaking household	991	0.4%
Not a limited English-speaking household	2,242	1.0%
Total non-English-speaking households	30,522	13.2%
Limited English-speaking household	6,219	2.7%
Not a limited English-speaking household	24,303	10.5%

Source: 2018 American Community Survey 1-Year Estimates (Table B16002)

Overall, people with Limited English Proficiency make up 16.8% of our service area population, with Spanish-speaking people making up the most significant proportion of this population, representing 10.5% of the total population. Vietnamese speaking people make up 1.4% of the population (0.7% of households) and no other language group makes up more than 1% of the service area population.

Available data from the 2018 American Community Survey estimates indicates the number of people and households with Limited English Proficiency has increased slightly since 2015.

Table 2 - Summary of LEP population among The Rapid's Charter Member Communities (2018)

	E. Grand Rapids	Grand Rapids	Grandville	Kentwood	Walker	Wyoming
Population 5 years and over	10,867	183,087	14,736	47,689	23,077	69,747
Speak only English	95.8%	83.9%	92.8%	76.2%	94.8%	78.1%
Speak a language other than English	4.2%	16.1%	7.2%	23.8%	5.2%	21.9%
Spanish or Spanish Creole	1.4%	10.9%	5.4%	6.6%	2.3%	17.2%
Other Indo-European languages	2.3%	1.9%	0.8%	7.7%	1.3%	1.4%
Asian and Pacific Island languages	0.5%	1.6%	1.0%	6.6%	1.0%	3.1%
Other languages	0.1%	1.6%	0.0%	2.9%	0.6%	0.2%

Source: 2018 American Community Survey 5-Year Estimates (Table S1601)

B. Factor 2: Frequency of Contact with LEP Individuals

Experience with LEP Persons

The Rapid has offices accessible to the public and therefore accessible to LEP individuals. Additionally, the board meets monthly and will host public hearings or input meetings as needed, all of which are open to the public and could potentially involve LEP individuals. Given the amount of LEP individuals as displayed in Table 1 (above), the probability of The Rapid's employees to encounter an LEP individual is high.

Utilization of available services by LEP individuals varies. Translation and Travel Training services are implemented upon request. The Language Line is frequently used, mostly for Spanish translation, with somewhat frequent request for Arabic, Bosnian, and Vietnamese. For example, from October 1, 2018 through September 30, 2020 Language Line received 1,549 calls: 6 translations for Vietnamese, 1 for Swahili, 1 for Arabic, 2 for Somali, 7 for Kinyarwanda, 5 for Albanian, 5 for Farsi, 3 for Dari, 1 for Hebrew, and 1,518 for Spanish. Language Line is available for all callers to The Rapid, and is used primarily by our Special Services department and the Information Center line.

C. Factor 3: The Nature and Importance of the Program, Activity, or Service to LEP

The Rapid provides two main services that are very important to people with Limited English Proficiency:

- Fixed Route bus service
- Door to door paratransit service

If limited English becomes a barrier to accessing these primary services, people will not have the mobility necessary to access what our community has to offer, including jobs, healthcare, shopping, recreation and social opportunities. Specific barriers that could arise because of limited English are:

- Difficulty reading and interpreting route schedules and maps
- Fare systems
- Rules for riding the bus and utilizing our other facilities
- Information on how to ride the systems
- Difficulties scheduling door-to-door paratransit service.
- Determining how to file complaints/suggestions/commendations

Community Organizations and Relationships

Historically, The Rapid (ITP) has worked closely with a variety of community organizations in our service area that work directly with Limited English Proficiency populations. Because these organizations provide critical services to LEP persons beyond transportation, their guidance is integral to the continuing improvement of our existing LEP services. We have implemented a number of their suggestions including holding bus trainings with translators and the Language Line. We will continue to dialogue with them to improve access for people with limited English proficiency.

Review of Programs, Activities, and Services

We have a fully integrated Language Line service in our call centers that can accommodate translations for up to 57 languages. Call center staff are trained to utilize the Language Line service in situations where English language proficiency is lacking. When newly-hired employees in the call center are brought on, they are given instructions of how and when to use the language line service. A copy of The Rapid's training manual for Language Line is included in Attachment 9. Usage of the Language Line service is evaluated by the Special Services Department on an on-going basis to monitor and evaluate effectiveness of the service. The Rapid also offers correspondence using Google Translate as needed. In addition, the Language Line service availability is highlighted on The Rapid's website in the Title VI section. All documents available on The Rapid's website and schedules may be translated to multiple languages using built-in browser settings. These documents include timetables, planning documents, Title VI notices, etc. Further, all physical Title VI notifications are posted in English and Spanish.

The Rapid offers Bus 101 trainings and familiarizations as requested with agencies and schools working with LEP populations, as well as the Clinica Santa Maria (Mercy Health) social workers and outreach personnel and Hispanic Center to offer information and resources, including a 'train the trainer' familiarization trip. Travel Training utilizes on-going contracted translation services with The Hispanic Center of West Michigan.

Our Travel Training department also has an ongoing relationship with the KISD (Kent Intermediate School District's) two locations in the city's northeast end and in Wyoming to the southwest. These schools work with adult learners in ESL. This gives the LEP adult learners an overview of The Rapid's service and intercity travel including Amtrak and the Indian Trails buses at this hub.

Interpreters are provided for our paratransit evaluation 'In Person Assessments'. Availability of one-on-one Travel Training or group familiarization trips with interpreters for businesses and community partners.

In addition to transit familiarization trips, our existing services include one-on-one travel training with a Rapid staff member and a contracted translator, a "field-trip" program performed by request during which a translator and a Rapid staff member will take a group on an introductory/learning ride as requested by partner agencies and churches, and our Language Line service.

Our Communications department has all important service-impacting messages translated from English to Spanish, including recorded audio translation (for on-bus announcements) and translated written materials (examples include public hearing

announcements, on-bus rules and conduct, and more). Additionally, our Communications department is prioritizing adding Spanish to new external facing campaigns and increasing ad buys with media outlets that have a primarily Spanish speaking audience.

All employees who are primarily in contact with the public (information center staff, paratransit call takers, and travel trainers) receive training about the availability of LEP services and how they are to utilize these services properly so that we may communicate with customers regardless of the language they speak.

D. Factor 4: Resources Available to The Rapid and Overall Costs

Inventory, Additional Needs, and Budget Analysis

The main costs associated with our current LEP services include our Language Line service and our contracted translation services. These services account for approximately \$14,300 worth of costs annually (\$13,800 for Language Line Services, \$500 for contracted services from the Hispanic Center of Western Michigan). In addition, our Travel Trainer/ADA Administrator (Sarah Green) is the main coordinator of our various transit orientation programs. Their staff time contributes to the cost of providing LEP services. Our Communications department budgets \$5,000 (per year) for English to Spanish translation services (through Michelle Jokisch Polo).

E. Current Practices and Future LEP Activities

Community Organization and Information Review; Direct Consultation with LEP Persons

Our interactions with the various community organizations previously mentioned serve as the basis of our continuing adaptation of LEP services to best serve LEP persons. Many of our partnerships with these organizations are long standing, so our LEP services and programming reflect on-going input and review from our partners.

Currently, we do not have an official program in place to consult directly with the LEP persons we serve to gauge satisfaction with our current services or identify unmet needs. We will continue to consult with the West Michigan Hispanic Chamber of Commerce and other allies to find ways to increase the reach of our LEP services, as well as working to develop a method to solicit direct input and feedback from the LEP persons that we serve.

Depending on the results of these two efforts, we will identify new program needs and/or adjust current programming to reflect any deficiencies in service.

SECTION V. DEMOGRAPHIC DATA

A. Introduction to Demographic Data

The Rapid's service area includes a six-city region of southwest Kent County in which a variety of fixed-route and demand-response services such as GO!Bus are offered. The six cities forming the Interurban Transit Partnership comprise the majority of its service area, including route extensions into the townships of Alpine, Byron, Gaines, Cascade, and Plainfield. The service area also extends into Ottawa County's Allendale Township and Tallmadge Township as part of its contracted service with Grand Valley State University and northern Kent County to the cities of Cedar Springs and Big Rapids as part of its contracted service with Ferris State University. Please note that the population data used in this report includes the primary service area of The Rapid: the cities of East Grand Rapids, Grand Rapids, Grandville, Kentwood, Walker, and Wyoming (Kent County) and portions of the townships of Alpine, Byron, Gaines, Cascade, and Plainfield (Kent County).

B. Minority and Poverty Population by Route

Table 3 illustrates total population, minority population, and population in poverty by route within $\frac{1}{4}$ a mile of stops for each bus route within The Rapid's fixed route network. Nearly all Rapid fixed route services provide service to high poverty areas where 20% or more of the local population is at or below the federal poverty threshold. The primary exception to this are the two fixed routes which exclusively operate in industrial zones, Route 27 Airport Industrial and Route 33 Walker Industrial. Several routes, including routes 1, 2, 3, 4, 10, 24, and Silver Line provide service to areas where more than half of the local population is non-white.

Table 3 – Minority and Poverty Populations within ¼ Mile of Stops by Route

Route	Population Served	Population in Poverty	Percent in Poverty	Minority Population	Percent Minority
Silver Line	15,053	4,427	30.3	8,569	56.9
Route 1 Division / Madison	22,910	5,284	24.0	13,567	59.2
Route 2 Kalamazoo	27,302	5,200	19.8	14,752	54.0
Route 3 Wyoming / Rivertown	22,200	3,552	17.1	11,801	53.2
Route 4 Eastern	30,748	5,973	21.3	15,959	51.9
Route 5 Wealthy / Woodland	22,371	3,439	15.9	8,415	37.6
Route 6 Eastown / Woodland	22,596	3,403	17.2	4,845	21.4
Route 7 West Leonard	16,785	3,290	20.0	4,721	28.1
Route 8 Prairie / Rivertown	20,210	3,247	17.3	9,598	47.5
Route 9 Alpine	15,624	3,381	24.7	5,645	36.1
Route 10 Clyde Park	19,843	3,840	21.4	11,532	58.1
Route 11 Plainfield	14,544	3,243	22.6	4,538	31.2
Route 12 Westside	13,256	1,943	19.9	3,949	29.8
Route 13 Michigan / Fuller	17,054	3,281	21.2	5,174	30.3
Route 14 East Fulton	14,690	2,548	20.8	4,368	29.7
Route 15 East Leonard	15,263	3,443	26.0	5,069	33.2
Route 24 Burton	30,072	5,062	18.4	15,478	51.5
Route 27 Airport Industrial	3,176	298	8.8	1,113	35.0
Route 28 West 28th	16,786	2,463	14.8	5,843	34.8
Route 29 East 28th	3,999	490	14.4	1,257	31.4
Route 33 Walker Industrial	3,218	256	7.8	585	18.2
Route 44 44th Street	21,572	2,414	11.2	8,729	40.5
System Total	389,272	70,477	18.1	165,507	42.5

Source: 2020 American Community Survey 5-Year Estimates

C. Service Equity Analysis

The Rapid provides equitable service across its service area to all minority groups. Appendices 1 and 2 demonstrate a high concentration of bus routes in most of the census tracts with high minority population and high concentrations of people in poverty. This is borne out by Table 4, which analyzes the distribution of minority population in the service area against transit ridership and bus frequency.

Table 4 – Analysis of Minority and Poverty Populations and Transit Service Levels

Route	Percent in Poverty	Percent Minority	Annual Ridership	% of Ridership	Peak Frequency
Silver Line	30.3	56.9	452,131	12.1	15 mins
Route 1 Division / Madison	24.0	59.2	299,136	8.0	30 mins
Route 2 Kalamazoo	19.8	54.0	321,197	8.6	15 mins
Route 3 Wyoming / Rivertown	17.1	53.2	109,678	2.9	30 mins
Route 4 Eastern	21.3	51.9	279,495	7.5	15 mins
Route 5 Wealthy / Woodland	15.9	37.6	103,249	2.8	30 mins
Route 6 Eastown / Woodland	17.2	21.4	167,941	4.5	30 mins
Route 7 West Leonard	20.0	28.1	123,173	3.3	30 mins
Route 8 Prairie / Rivertown	17.3	47.5	139,982	3.7	30 mins
Route 9 Alpine	24.7	36.1	324,794	8.7	15 mins
Route 10 Clyde Park	21.4	58.1	160,542	4.3	30 mins
Route 11 Plainfield	22.6	31.2	187,204	5.0	15 mins
Route 12 Westside	19.9	29.8	150,372	4.0	30 mins
Route 13 Michigan/Fuller	21.2	30.3	104,027	2.8	30 mins
Route 14 East Fulton	20.8	29.7	74,371	2.0	30 mins
Route 15 East Leonard	26.0	33.2	174,931	4.7	30 mins
Route 24 Burton	18.4	51.5	112,021	3.0	30 mins
Route 27 Airport Industrial	8.8	35.0	38,600	1.0	30 mins
Route 28 West 28th	14.8	34.8	196,449	5.2	15 mins
Route 29 East 28th	14.4	31.4	65,193	1.7	30 mins
Route 33 Walker Industrial	7.8	18.2	n/a	n/a	60 mins
Route 44 44th Street	11.2	40.5	160,913	4.3	30 mins
System Total	18.1	42.5	3,745,399	100.0	

Source: 2020 American Community Survey 5-Year Estimates; Rapid FY 22 Ridership Data

Several of The Rapid's 15-minute peak service routes coincide with high minority and low-income areas. For instance, the Division Avenue corridor receives 15-minute all day service (6am – 6pm) on weekdays via Silver Line and 30-minute all day service on Route 1 with a total of 11 vehicles serving the corridor throughout the day. Silver Line serves a population that is 30.3% low-income and 56.9% minority within a quarter mile of stops along its route, the highest in the system. Further, the Silver Line BRT is The Rapid's flagship route with its highest level of service and stop amenities. Route 10 Clyde Park is one notable exception; however, coupled with Route 3, the majority of the high minority and low-income populations along the alignment (primarily the Grandville Avenue/Cesar Chavez corridor) receive 15-minute all day service on weekdays. Route 2 Kalamazoo and Route 4 Eastern also serve high minority/low income populations with 15-minute all day service (6am – 6pm) on weekdays.

Finally, it is worth noting the vast majority of our service has access to adequate transit service. Using transit planning software, Remix, it was found that 92% of the residents in our primary service area live within ½ mile a fixed route bus line.

SECTION VI. SERVICE STANDARDS AND POLICIES

A. Vehicle Load

Vehicle load factor for The Rapid route system is monitored on an ongoing basis. The method used to monitor this activity includes passenger sampling, analysis of ridership data, and use of driver feedback. Since the outbreak of coronavirus in West Michigan around mid-March, overcrowding has been imperative to monitor and control. While ridership decreased drastically during this time period, service levels were reduced correspondingly in order to preserve agency operating resources. Capacity limitations of 15 persons maximum on board per vehicle were instituted system-wide between March and August 2020 in order to allow for proper distancing and reduce likelihood of coronavirus transmission. Additional “shadow” vehicles were dispatched when operators reported vehicles were at capacity limits. Capacity limits were relaxed in late August 2020 when service levels were increased and the number of additional “shadow” vehicles necessary had remained at zero for several weeks. With increased capacity and reduced ridership levels, overcrowding has not been an issue on any route.

In the case where overcrowding consistently occurs on a particular route, The Rapid examines frequency improvements, schedule changes, or enhanced transit modes such as BRT, and brings these suggestions forth to The Rapid’s Board of Directors who provide final approval on major route changes or investments.

The vehicle load factor (ratio of peak hour seats available compared to peak hour boardings) is illustrated below in Table 5. Figures represent weekday service.

Table 5 – Vehicle Load Factor

Route	Peak Hour	Frequency	Peak Hour Vehicles	Capacity	Ridership at Peak Hour	Load Factor
Silver Line	4:00-4:59 pm	15	6	240	126	0.53
Route 1 Division / Madison	3:00-3:59 pm	30	4.5	180	91	0.51
Route 2 Kalamazoo	3:00-3:59 pm	15	6	240	123	0.51
Route 3 Wyoming / Rivertown	3:00-3:59 pm	30	3	120	46	0.39
Route 4 Eastern	3:00-3:59 pm	15	7	280	146	0.52
Route 5 Wealthy / Woodland	4:00-4:59 pm	30	3	120	47	0.40
Route 6 Eastown / Woodland	3:00-3:59 pm	30	3	120	56	0.47
Route 7 West Leonard	3:00-3:59 pm	30	2.5	100	72	0.72
Route 8 Prairie / Rivertown	3:00-3:59 pm	30	3	120	50	0.42
Route 9 Alpine	3:00-3:59 pm	15	5	200	125	0.62
Route 10 Clyde Park	3:00-3:59 pm	30	3	120	68	0.57
Route 11 Plainfield	3:00-3:59 pm	15	5	200	97	0.48

Route	Peak Hour	Frequency	Peak Hour Vehicles	Capacity	Ridership at Peak Hour	Load Factor
Route 12 West Fulton	7:00-7:59 am	30	2.5	100	84	0.84
Route 13 Michigan / Fuller	3:00-3:59 pm	30	2.5	100	49	0.49
Route 14 East Fulton	3:00-3:59 pm	30	2	80	42	0.52
Route 15 East Leonard	3:00-3:59 pm	30	2.5	100	81	0.81
Route 24 Burton	2:00-2:59 pm	30	4	160	58	0.36
Route 27 Airport Industrial	3:00-3:59 pm	30	1	40	24	0.60
Route 28 West 28th	3:00-3:59 pm	15	6	240	83	0.34
Route 29 East 28th	3:00-3:59 pm	30	1	40	25	0.62
Route 33 Walker Industrial	n/a	60	1	40	n/a	n/a
Route 44 44th Street	3:00-3:59 pm	30	4	160	69	0.43
				3,100	1,563	0.50

The Rapid regularly monitors vehicle load factors. If a route has a load factor greater than 1.0, the route is flagged for close monitoring. Routes with load factors of greater than 1.5 warrant actions taken to address the issue. Since the pandemic, issues of full buses or overcrowding are very rare. Essentially, the only route which experiences this phenomenon is Route 12 Westside which serves students at Union High School. Other routes with higher load factors include Route 7, Route 9, Route 10, and Route 15. Route 9 features 15 minute service at peak to address potential overcrowding issues, though this occurrence is very rare. Route 15 also serves high school students but instances of overcrowding have been non-existent.

If a route's load factor reaches less than 0.50, Rapid Planning staff monitors the situation, and if the load factors fall below 0.30, measures to address this issue will be taken, such as cutting service or modifying existing service. Routes 3 and 24 currently have very low load factors just above 0.30. Route 3 is coupled with Route 10 through the Grandville Ave/Cesar Chavez Ave corridor which contributes to its reduced load factor. Route 24 is one of The Rapid's longest routes in terms of mileage, and in order to maintain 30-minute frequency (deemed to be the minimum acceptable peak frequency for a route of this nature), four vehicles are required. In turn, this causes lower vehicle loads as ridership is dispersed throughout the four vehicles.

B. Vehicle Headways

As of December 2022, six routes provide 15-minute service or greater during weekday peak hours. These routes are the Silver Line, Route 2 Kalamazoo, Route 4 Eastern, Route 9 Alpine, Route 11 Plainfield, and Route 28 28th Street. The rest of the system operates every 30 minutes during weekday service. Table 6 illustrates vehicle headways by route.

Table 6 – Vehicle Headways by Route and Time

Route	Weekday AM/PM	Weekday Midday	Weekday Evening	Saturday Morning	Saturday Midday	Saturday Evening	Sunday
Silver Line	15	15	30	30	30	30	30
Route 1 Division / Madison	30	30	30	30	30	30	30
Route 2 Kalamazoo	15	15	30	60	30	60	30
Route 3 Wyoming / Rivertown	30	30	60	60	60	60	60
Route 4 Eastern	15	15	30	60	30	60	60
Route 5 Wealthy / Woodland	30	30	60	60	60	60	
Route 6 Eastown / Woodland	30	30	30	60	30	60	60
Route 7 West Leonard	30	30	60	60	60	60	60
Route 8 Prairie / Rivertown	30	30	60	60	60	60	60
Route 9 Alpine	15	15	30	60	30	60	60
Route 10 Clyde Park	30	30	60	60	60	60	60
Route 11 Plainfield	15	15	30	60	30	60	60
Route 12 Westside	30	30	60	60	60	60	
Route 13 Michigan / Fuller	30	60	60	60	60	60	
Route 14 East Fulton	30	60	60	60	60	60	
Route 15 East Leonard	30	30	60	60	60	60	60
Route 24 Burton	30	30	60	60	60	60	
Route 27 Woodland / Airport	30	60	60				
Route 28 West 28 th	15	15	30	60	30	60	60
Route 29 East 28 th	30	30	60	60	60	60	60
Route 33 Walker Industrial	60						
Route 44 44th Street	30	30	60	60	60	60	60

Note:

Weekday AM/PM: 6:15 AM - 8:45 AM and 3:15 PM – 6:45 PM

Weekday Midday: 8:45 AM – 3:15 PM

Weekday Evening: 6:45 PM – 10:00 PM

Saturday Morning: 6:00 AM - 9:30 AM

Saturday Midday: 9:30 AM - 5:00 PM

Saturday Evening: 5:00 PM - 10:00 PM

Sunday: 7:00 AM - 7:00 PM

C. On-Time Performance

The Rapid maintains a standard of 90.0% on-time with for the fixed-routes system which is measured on an ongoing basis and reported on a quarterly basis. The standard is based on real-time vehicle information from all its fixed route buses, as opposed to random time checks completed by road supervisors, which was the former method. This has provided a much more comprehensive picture of how well the system is adhering to posted schedules. Various obstacles such as inclement weather, construction, and traffic delays occasionally hinder the overall performance of the system. “On-time” is defined as being less than five (5) minutes late and zero (0) minutes early. Table 7 illustrates the on-time performance by quarter since FY 2020.

Table 7 – Fixed-Route On-Time Performance Summary

Quarter	Months	On-Time Performance
FY 2020 1st Quarter	Oct-Dec	81.9%
FY 2020 2nd Quarter	Jan-Mar	88.7%
FY 2020 3rd Quarter	Apr-Jun	90.0%
FY 2020 4 th Quarter	Jul-Sep	93.9%
FY 2021 1st Quarter	Oct-Dec	95.2%
FY 2021 2nd Quarter	Jan-Mar	95.3%
FY 2021 3rd Quarter	Apr-Jun	93.4%
FY 2021 4th Quarter	Jul-Sep	88.4%
FY 2022 1st Quarter	Oct-Dec	89.2%
FY 2022 2nd Quarter	Jan-Mar	91.0%
FY 2022 3rd Quarter	Apr-Jun	87.9%
FY 2022 4 th Quarter	Jul-Sep	85.8%
	Average	90.0%

D. Distribution of Transit Amenities

Passenger shelters are generally located at stops that demonstrate at least forty boardings per operating day. On occasion, The Rapid will locate at shelter at stops with less passenger activity that demonstrate a need such as locations near senior housing, sizable disabled population, grocery stores, or in locations where a partnering entity or jurisdiction helps pay for a new shelter and its installation. Currently, The Rapid has 1,600 bus stops. All The Rapid routes have bus stop signs at intervals of one-tenth to one-quarter of a mile. In addition, all the stops in the system contain information panels that illustrate route schedules and maps. Furthermore, The Rapid has installed 153 benches and 112 shelters at various stops throughout the system

based on boardings per day, transfer locations, proximity to senior or disabled populations, and key destinations such as grocery stores, medical facilities, and schools.

In 2019, The Rapid, in partnership with the City of Grand Rapids Mobile GR and Parking Services Department, embarked on an initiative to improve the bus stop waiting environment at transit stops throughout the city of Grand Rapids. This initiative, referred to as the “Bus Stop Improvement Program,” has resulted in installations of several benches, transit shelters, waste receptacles, and other stop amenities to improve passenger waiting experiences. On the heels of the successful installation of the initial set of improvements through 2021, subsequent phases of improvements are planned in order to meet the original goals of the Bus Stop Improvement Program. This program is expected to continue through 2024.

E. Service Availability

The Rapid’s Accessibility Policy is based on the premise that a route is accessible for the general public if the person must travel no more than 2,000 feet (approximately a five-minute walk) to get to the nearest bus stop. In addition, all of The Rapid’s fixed-routes are accompanied by its GO!Bus demand-response paratransit service, available to all residents of The Rapid’s six-city service area who cannot access the fixed route buses as defined by the Americans With Disabilities Act. The Rapid also offers its PASS service, which is a demand response service which can be used by anyone living in The Rapid’s six-city service area. The PASS service is available to destinations more than $\frac{3}{4}$ of a mile from a Rapid fixed route bus line and will take riders from their origin/destination to the nearest bus line, to ensure that all areas of our six-city service area are accessible by public transportation. Lastly, The Rapid launched its mobility on-demand microtransit service in January 2022. The service is available in industrial zones in Walker and Kentwood. Riders can request trips calling in or using a smartphone app. Trips must begin and end within the defined geographic zone.

F. Vehicle Assignment

The Rapid has a fixed-route fleet size of 162 wheelchair-accessible buses. All The Rapid’s regular fixed route buses are forty feet in length and are able to seat approximately 40 people. The Rapid also operates the City of Grand Rapids’ Downtown Area Shuttle (DASH) which is operated with 29- and 35-foot vehicles. DASH vehicles are capable of seating between 30-35 passengers. Buses are predominately assigned based on route ridership with the exception of specific buses allocated to bus rapid transit (BRT) routes (i.e., Silver Line and Laker Line) and two vehicles dedicated for long-distance highway travel between Grand Rapids and Big Rapids contracted with Ferris State University (Route 100). Occasionally other considerations such as bus availability, narrow streets, excessive curbage or operational factors

influence how buses are assigned to particular routes; however, vehicles are predominantly assigned to routes at random. In addition, all fixed buses are equipped with automated passenger counters (APCs). Table 8 details The Rapid's fleet as of December 2022.

Table 8 – Vehicle Inventory

Number in Fleet	Length	Year Manufactured	Company	Model	Fuel	Notes
5	40'	2009	GILLIG	Low Floor	Diesel	
11	40'	2011	GILLIG	Low Floor	Diesel	
5	29'	2011	GILLIG	Low Floor	Diesel	DASH
21	40'	2012	GILLIG	Low Floor	Diesel	
10	40'	2013	GILLIG	Low Floor	Diesel	
10	40'	2014	GILLIG	BRT Plus	Hybrid-Electric	Silver Line
1	40'	2016	GILLIG	Low Floor	CNG	
5	35'	2017	GILLIG	Low Floor	CNG	DASH
27	40'	2017	GILLIG	Low Floor	CNG	
20	40'	2018	GILLIG	Low Floor	CNG	
2	60'	2019	NEW FLYER	XN60'	CNG	Laker Line
4	35'	2019	GILLIG	Low Floor	CNG	DASH
10	40'	2020	GILLIG	Low Floor	CNG	
14	60'	2020	NEW FLYER	XN60'	CNG	Laker Line

G. Transit Security

The Rapid utilizes various tools to maximize transit security and the safety of passengers. The Rapid employs a full time Security Manager and eight full time Fare Enforcement Officers. The Rapid has 24 hour security at its Rapid Central Station facility and contracts with local law enforcement for assistance during busy times at the station. Furthermore, Central Station is equipped with video surveillance and all buses are equipped with video and audio surveillance. Security and Fare Enforcement Officers are equipped with body-worn cameras that are worn during their shift. The Rapid also exercises a policy of reporting any and all suspicious persons and activities. In addition, all operators and staff have gone through security training programs and emergency response protocols.

SECTION VII. TITLE VI MONITORING POLICIES

A. Overview of The Rapid's Monitoring Policies

There are three primary tools that The Rapid uses to monitor service. These three tools are monthly ridership and productivity reports, quarterly report cards, and Geographic Information Systems (GIS) technology.

The Ridership and Productivity Report is presented to The Rapid Board each month. This report measures route performance based on passengers per mile, passengers per hour, farebox recovery percentage, and ridership. The culmination of this information determines route effectiveness and efficiency and is a tool used by staff and The Rapid Board to establish planning policy.

Report Cards to the community are presented to The Rapid Board and made available to the public on a quarterly basis (every three months). The report card is designed to measure service quality and safety by reporting system productivity (ridership), safety (accidents per 100,000 miles), customer service (complaints per 100,000 passengers, on time performance, and cost effectiveness (cost per passenger). This report is posted on The Rapid's web site and is given to the local media.

The Rapid Planning staff use Geographical Information Systems (GIS), on-board survey data, and farebox data, passenger surveys and the Remix planning tool to gather and monitor data and ridership patterns for the fixed-route system. Internally, The Rapid's Route and Service Planning Committee uses this data to evaluate and adapt service where necessary. The Rapid uses U.S. Census, LEHD, and BLS data to analyze recent and upcoming route changes and/or enhancements for our current fixed route services.

As of October 2020, The Rapid is undergoing a comprehensive operational analysis (COA) colloquially referred to as *Mobility for All*. Mobility for All is a planning process that explores practical, achievable ways The Rapid can improve its transit network. The final recommendations of the plan will be "cost-neutral" utilizing existing resources to increase system ridership, productivity, and implement new services to better serve the six-city region. More information on the plan at therapidmobilityforall.com.

B. Monitoring Service Quality Using Ridership Surveys

The Rapid conducts statistically significant onboard surveys every two years. The Rapid will use the information gleaned from these surveys to monitor service to quality to Title VI protected classes.

The surveys identify individuals who identify themselves as a member of a minority group and/or in a low-income bracket. The Rapid will analyze these responses to see determine if there are significantly differing responses between different demographic groups, whether minority or income. Questions analyzed will include those that deal with customer satisfaction with the services The Rapid offers, including those dealing with wait times, schedule adherence, and overall satisfaction with The Rapid's services.

If there is a greater than 20% response difference identified for a protected demographic, The Rapid will look at the responses and take corrective action to address the disparity.

C. Continual Assessment of Compliance by the Grantee

In order to allow for ongoing compliance assessments, The Rapid will take the following actions:

- To the extent feasible, the procedure and practices listed in this text will be monitored for assessment and compliance on a quarterly or annual basis.
- The Rapid, through its Route and Service Planning Committee, will monitor new and existing service to assure compliance with Title VI requirements.
- The Rapid will take action to address Title VI deficiencies raised by official reviews.

The Rapid conducts statistically significant onboard surveys every two years. The Rapid will use the information gleaned from these surveys to monitor service to quality to Title VI protected classes.

The surveys identify individuals who identify themselves as a member of a minority groups and/or in low-income brackets. The Rapid will analyze these responses to see determine if there are significantly differing responses between different demographic groups, whether minority or income. Questions analyzed will include those that deal with customer satisfaction with the services The Rapid offers, including those dealing with wait times, schedule adherence, and overall satisfaction with The Rapid's services.

If there is a greater than 20% response difference identified for a certain demographic, The Rapid will look at the responses and take corrective action to address the disparity.

The Rapid has had no Title VI complaints in the past three years that have resulted in the need for corrective actions.

SECTION VIII. CHANGES IN SERVICE FEATURES AND FARE LEVELS

A. Public Outreach Overview

At The Rapid, we utilize a variety of methods to continually communicate with and inform the public we serve. English is the most spoken language in our region followed by Spanish. To ensure that the public is able to engage with us, we translate all public outreach materials to Spanish and utilize interpreter services such as Language Line.

1. The Rapid's Website (<http://ridetherapid.org>)

The Rapid's website is an informational hub for our customers and the public at large. All pertinent information for passengers and taxpayers can be found on our website. Most importantly, we utilize this website to notify passengers and the public about pertinent information as needed. The Rapid's website meets ADA accessibility guidelines and features Google Translate, which supports the translation of the website to more than 100 languages.

2. Social Media

Our social media platforms (Facebook, Twitter, Instagram, LinkedIn, YouTube, etc.) are places where passengers can find relevant information, real-time customer service, and an engagement communication space.

3. Interior Bus Information

The Rapid utilizes internal bus information racks, located behind the bus operator, to notify passengers of detours, rider alerts and other relevant details. When needed, interior bus advertisement space is also used for general outreach to the public regarding information notices.

4. Rider and Public Surveys

Periodically, The Rapid surveys riders, and the general public, to gain information and feedback about who is using the service, overall perceptions of The Rapid, and desired service changes.

5. Public Events

The Rapid routinely attends various events throughout the six-city service area to engage with the public and answer questions, as well as share information. We attend everything from senior fairs to chamber of commerce meetings.

6. Alerts

The Rapid utilizes digital rider alerts that notify passengers of route and service alerts, as well as other important information that pertains to utilizing The Rapid. Riders can sign up to receive these alerts via text message or email.

7. Email Newsletter

An email newsletter is utilized for various important notifications and public outreach.

8. Public Meetings

When necessary for route and service planning or other important topics, The Rapid utilizes public information meetings or public hearings to gain public feedback and assess needs.

9. News Media

The Rapid routinely works with local news media to notify the public of important information impacting the service.

10. Partnerships

Organizational and business partnerships are a key aspect of public outreach. For example, The Rapid often partners with organizations like Disability Advocates of Kent County to educate and spread awareness about specific route and planning needs, gain feedback and improve our system.

B. Threshold for Major Service Changes

The Rapid's established threshold for a "major" service change is as follows:

If 25% or greater of either the vehicle revenue miles or the passenger miles on one of The Rapid's routes is to be affected by a service change, this constitutes a Major Service Change for The Rapid and public hearings must be held.

C. The Rapid's Disparate Impact and Disproportionate Burden Policy

The Rapid Board adopted a Disparate Impact and Disproportionate Burden Policy in February 2014. The preparation for this policy included a rider survey indicating fare types used by demographic. This policy dictates that low income and minority populations will not bear a disparate impact or disproportionate burden of any fare or service changes that The Rapid makes. A copy of the policy can be found in Appendix 5.

D. The Rapid's New Facility Construction Outreach Process

For all new construction projects, The Rapid fully undergoes the FTA environmental review process. This includes analyzing all disproportionate social impacts of the proposed project to vulnerable populations and an environmental justice review. In addition, The Rapid conducts public outreach to gain community input regarding any proposed construction projects, the level of the outreach depending on the size of the project and potential community impacts. This includes outreach to Title VI populations to ensure their voice is heard as part of the public process.

E. Changes in Service Levels

Since the last Title VI Plan was adopted in December 2017, The Rapid has had numerous significant changes in service levels to its fixed route system, all occurring since March 2020 in response to the COVID-19 pandemic. These major service changes are known to be exempt from necessitating a required service analysis. When the coronavirus pandemic appeared in West Michigan in mid-March, ridership levels began to decrease drastically, dropping as low as 90% from the previous year. Further, state-mandated "shelter-in-place" orders were given by the Governor to discourage travel and transmission of the virus. With ridership and general travel throughout the region unprecedentedly low, a modified weekend service was introduced on March 24th. This service suspended eight of the system's lowest ridership/least productive routes as well as Route 19 (a jointly-funded route with external partners Spectrum Health and the City of Grand Rapids) due to funding issues. Span of service was reduced to 7am to 7pm on all routes Monday through Sunday as only the most essential service was chosen to operate on an hourly basis. By late April, several routes experiencing capacity issues (1, 2, 4, 9, and 28) were increased to 30-minute service; however, the same nine routes remained suspended and spans of service remained between 7am to 7pm.

On May 26th, a reduced Summer service was implemented as ridership began to increase to approximately 40% from the same time period during the previous year. Spans of service were increased to 5:30am to 10:30pm on weekdays for all routes, and regular weekend hours and spans of service were reintroduced. Routes previously

suspended were reintroduced into service at hourly frequency (with the exception of Route 19 and contracted services which remained suspended). Several routes with higher ridership, including Silver Line, Route 1, Route 2, Route 4, Route 9, and Route 28, were operated at 15-minute frequency in order to provide proper distancing opportunity with 15-person on-board capacity limitations still enforced.

The Summer service remained in effect until August 31st which saw all routes operating at hourly service upgraded to half-hour frequency and the cessation of on-board capacity limits. Route 1 returned to half hour weekday frequency as it had operated prior to the pandemic.

While several service changes were implemented in relatively rapid succession, it was recognized that the changes were temporary to respond to effects of the COVID-19 pandemic. The comprehensive operational analysis (COA) continued along throughout the pandemic, and at such time that the recommendations of the COA are adopted in early 2021, the appropriate public hearings and disparate impact, disproportionate burden (DIDB) analyses were to be conducted on all proposed route changes in order to make them permanent and ensure protected populations are not disproportionately impacted. A Title VI report was produced at the conclusion of the project with the goal of ascertaining if service changes created a disparate impact on minority populations across the service area or a disproportionate burden on individuals and families living below the poverty line. The DIDB analysis utilized American Community Survey data on race and income available through the US Census Bureau. The resulting analysis demonstrated no disparate impact or disproportionate burden was created.

F. Changes in Fare Levels

Smart Card

The Rapid has been working to implement electronic fare media (colloquially referred to as the Wave Card) since 2017. The electronic fare media included adoption of a fare-capping system (see table below) adopted by The Rapid's Board of Directors in May 2017 and implemented in 2018. Prior to adoption and implementation, Rapid staff conducted a robust public outreach campaign regarding proposed fare structure changes. Throughout April 2017, Rapid staff solicited feedback from numerous sources, including social media, email, phone, written, as well as seven public meetings. Materials for social media, email, and notifications were made available in both English and Spanish.

Given that fare levels were not affected as part of the implementation of the smart card program, it was determined the program did not constitute a major fare change given that it was only fare media options that were being added.

An internal equitable accessibility analysis was conducted in a series of phases as part of the implementation of the Wave Card. The first phase confirmed that the distribution network where passengers could acquire Wave Cards was adequate. It was found that distribution network for Wave Cards superseded that of the paper ticket distribution network and further provided enhanced opportunities for lower-income and minority populations to access the fare card. The distribution network of retail sites was field-verified to ensure the passes were available as advertised. Appendix 10 of this report contains the results of this accessibility analysis. Further, this first phase included the promotion and distribution of the card where Wave Cards for a brief period were made available at no cost. Passengers had the opportunity to come to Rapid Central Station and register a Wave Card in their name for free. Finally, the second phase of the equity analysis involved the issue of the elimination of cash fare transfers, cessation of selling and accepting paper tickets, and the elimination of change cards for cash fare. Analysis of these factors determined no DIDB issues were present given the fact Wave Cards were widely available with increased access compared to traditional fare media and thus a fare equity analysis was unwarranted.

Finally, proposed Wave Card-related fare changes went forward to the public through a public hearing.

Table 9 – Adopted Wave Card Fare Capping Structure

Categories	Cash Fare or Cap Increment	10 Ride	31 day	7 day	1 day
Adult	\$1.75	-----	\$47.00	\$16.00	\$3.50
Youth	\$1.25	-----	\$33.75	\$11.25	\$2.50
Reduced	\$0.85	-----	\$30.00	\$10.50	\$2.25
Partner/ Student	\$1.25	-----	-----	\$11.25	-----

Restoring Fares within Silver Line Downtown Fare Free Zone and on Route 19

Silver Line

In September 2016, The Rapid Board approved a 10-month pilot program for the implementation of a fare-free zone for the Silver Line BRT in downtown Grand Rapids (Central Station to Wealthy Street). The fare revenue was agreed upon to be fully reimbursed to The Rapid by the City of Grand Rapids Mobile GR Department and approved by the City of Grand Rapids City Commission. This pilot program was extended annually. However, with the increase of DASH frequencies in August 2018 (7-8 minutes headways all day), changes in mobility patterns in downtown Grand Rapids, and the cost increase of the DASH service contract in 2019, the sponsored fare-free downtown Silver Line became partially redundant (due to increased DASH service) and no longer financially feasible for Mobile GR (due to DASH cost increases).

Route 19

In May 2018, The Rapid Board authorized the approval to execute a contract with Spectrum Health and the City of Grand Rapids for funding to significantly enhance Route 19 with realignment and increased all-day frequencies. This agreement included a provision that all Spectrum employees can ride the entire fixed-route system fare-free, and a provision from Mobile GR that Route 19 becomes fare-free to all riders. Route 19 had seen significant increases in ridership since the implementation of this enhanced service, and the vast majority of riders are Spectrum employees along the corridor to their park-and-ride lot on Plymouth Ave. However, due to an array of unintended ridership outcomes by providing fare-free service, a large number of concerns emerged from the City of Grand Rapids, Spectrum Health, and other partners. It was determined that concluding the fare free service was the preferred alternative to proceed.

Public Outreach

Staff hosted an array of public input opportunities including:

- Four (4) public meetings on July 1st and July 8th,
- Two (2) Facebook Live Q&A sessions
- Provided email, phone, and mail options for comment, and interacted heavily on social media.

Overall, staff received minimal concerns for the implementation of fares and all public interaction was documented. The Rapid worked collaboratively to communicate this change and provide relevant information and education about resources available to riders by:

- Providing high-visibility notice on buses of the changes to ease the transition on our riders
- Working very closely with transportation staff to mitigate customer service issues as they arise
- Direct coordination with our partner agencies to specifically focus on any potential negative impacts to our most vulnerable riders.

Title VI Analysis

Demographic passenger surveys were completed on the downtown Silver Line and Route 19 in early March 2020. In discussions with FTA officials, The Rapid confirmed that widespread public communication of this change, coupled with connections to resources for transit fare assistance for any negatively impacted riders, will suffice as mitigation for any impacts of this change. This determination by FTA officials was predicated on the fact that the no-fare nature of the services were returning to the base fares applied throughout the entire fixed route system. This change to Silver Line and Route 19 occurred during the COVID-19 pandemic and was primarily the result of the funding sources for both no-fare services being eliminated, as well as the suspension of Route 19 per the request of Spectrum Health, the primary contract partner for the route, as opposed to a Rapid-led decision.