



Capital District Transportation Authority



FLEX Guilderland Title VI Service Equity Analysis

April 2025

For more information, contact the CDTA Title VI Officer at Titlevi@cdta.org

Table of Contents

Introduction	3
Summary of Service Changes.....	4
FLEX Colonie/Guilderland/Latham.....	4
FLEX Guilderland	5
Route #117.....	6
CDTA Title VI Policies	7
Major Service Change and Fare Change Policy.....	7
Analysis Procedure.....	7
Adverse Effects	8
Disparate Impact Policy	8
Disproportionate Burden Policy.....	8
Service Equity Analysis Process.....	9
Policy for the Soliciting of Public Comment.....	9
Analysis of Proposed Service Changes.....	11
Disparate Impact and Disproportionate Burden Determination.....	12
Public Engagement.....	13
Appendix A	14
Quarter Mile Hexes Gaining or Losing Service – Weekdays	14
Quarter Mile Hexes Gaining or Losing Service – Saturdays	15
Quarter Mile Hexes Gaining or Losing Service –Sundays	16
Map of Minority and Low-Income Census Tracts Affected by Service Change	17
Map of Minority and Low-Income Quarter Mile Hexagons Affected by Service Change.....	18
Appendix B	19
CDTA Board of Directors Approval of Service Change Analysis	19
Appendix C	20
CDTA Board of Directors Approval of Title VI Program	20

Introduction

The Capital District Transportation Authority (CDTA) has prepared this Title VI Service Equity Analysis to ensure compliance with FTA Circular C 4702.1B dated October 1, 2012, and to implement the FLEX Guilderland plan in a fair and equitable manner.

CDTA receives federal financial assistance to provide transit service. Federal funding is received in accordance with Chapter 53 of Title 49 of United States Code, as amended by the FAST act. As a recipient of federal funds, CDTA complies with the Regulations relative to nondiscrimination in federally assisted programs of the Department of Transportation, Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time. Title VI prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. Accordingly, CDTA is committed to the following:

1. Ensure that the level and quality of transit service is provided without regard to race, color, or national origin;
2. Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations;
3. Promote the full and fair participation of all affected populations in transit decision making;
4. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations;
5. Ensure meaningful access to programs and activities by persons with limited English proficiency.

Because the plan described in this analysis constitutes a major service change, it has triggered this service equity analysis.

Summary of Service Changes

CDTA received feedback from customers indicating general dissatisfaction with FLEX microtransit service in the Colonie/Guilderland/Latham (CGL) zone. Of primary concern were the long wait times for a pickup. CDTA concluded that this zone is too popular and too large to function as a microtransit zone. CDTA used the origin/destination data from FLEX to plan a replacement for the FLEX CGL zone. Those planned changes are summarized below.

FLEX Colonie/Guilderland/Latham

The current FLEX CGL zone will be discontinued. This zone serves approximately 13 square miles including points outside of the main polygon such as Latham Farms and Collins Circle at UAlbany.

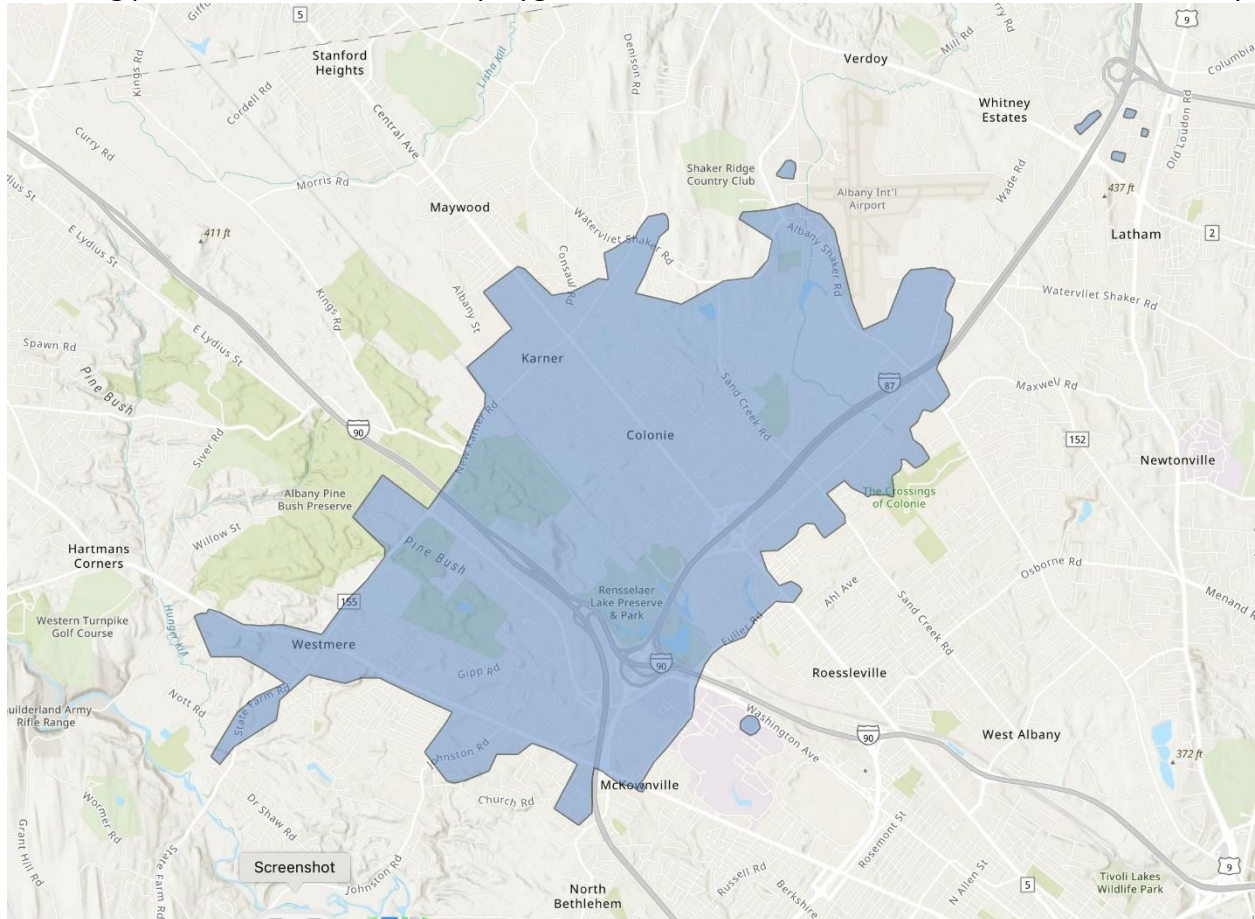


Figure 1: FLEX CGL Zone

FLEX Guilderland

CDTA will begin operation of FLEX Guilderland in May, 2025. The proposed microtransit zone will include point-to-point service in a 3.6 square mile area including Crossgates Mall, Crossgates Commons, and areas mainly to the west in the town of Guilderland.

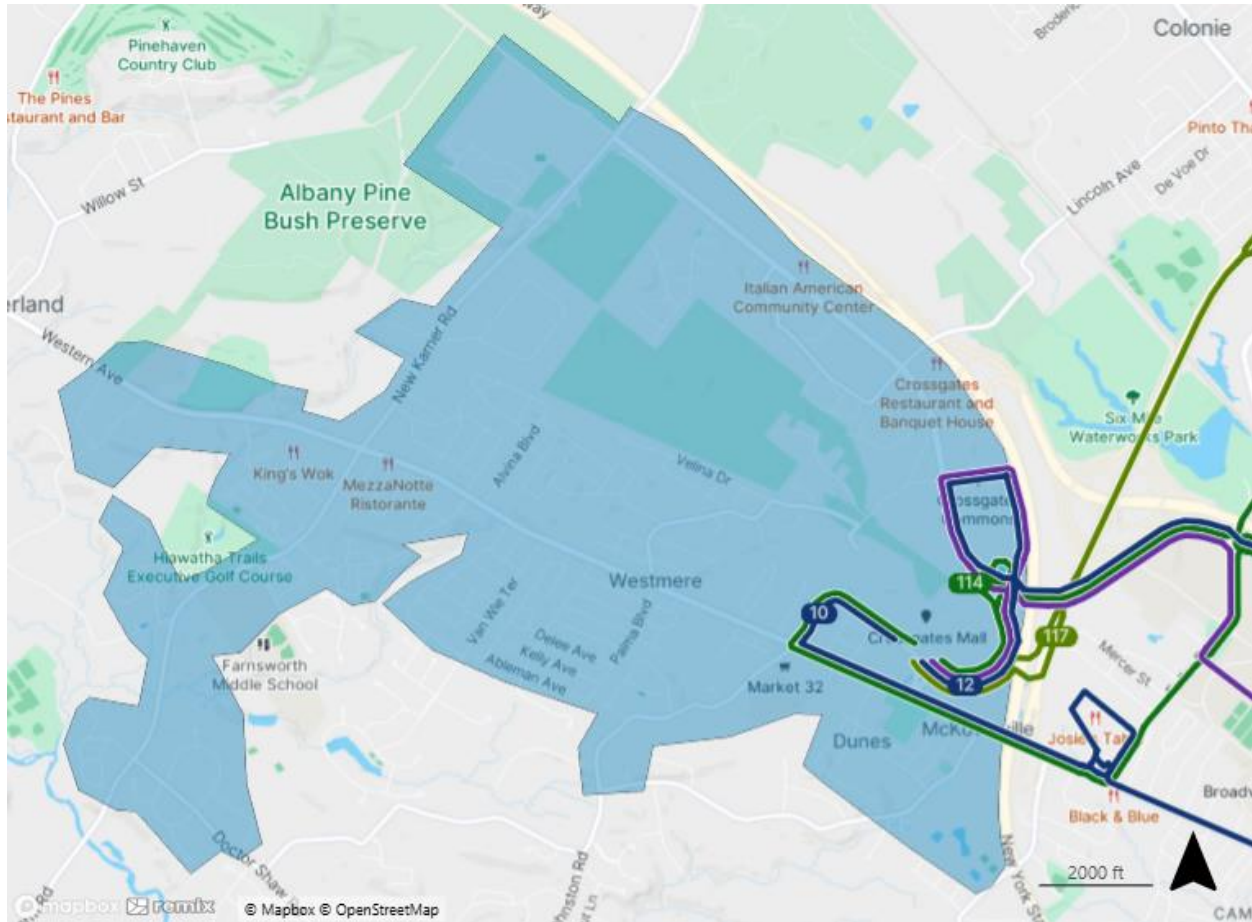


Figure 2: FLEX Guilderland (blue shaded area) and fixed route connections at Crossgates Mall.

The area is the same as the Guilderland segment of the former CGL zone. Riders will be able to ride FLEX to Crossgates Mall or Crossgates Commons and transfer to CDTA fixed route service to complete their trips.

FLEX Guilderland will operate from (approximately) 6:00 AM to 10:45 PM on weekdays and Saturdays and 10:00 AM to 6:00 PM on Sundays, which is the same as the current FLEX Colonie/Guilderland/Latham zone.

Route #117

To properly cover the areas no longer served by FLEX, Route #117 will begin running seven days a week with 30 minute headways during the week (up from 90) and 40 to 45 minutes on weekends (up from one trip on Sundays). This should allow enough frequency for Guilderland residents to pair trips on FLEX with Route #117 to cover the trips they are currently taking with FLEX.

The geography of Route #117 will also change. To speed up connections between Crossgates Mall, Colonie Station, and Wolf Road, Route #117 will now drive on I-87 from Crossgates Mall to Wolf Road. Route #117 will also be extended to Troy Schenectady Road, in order to facilitate transfers to Route #370.

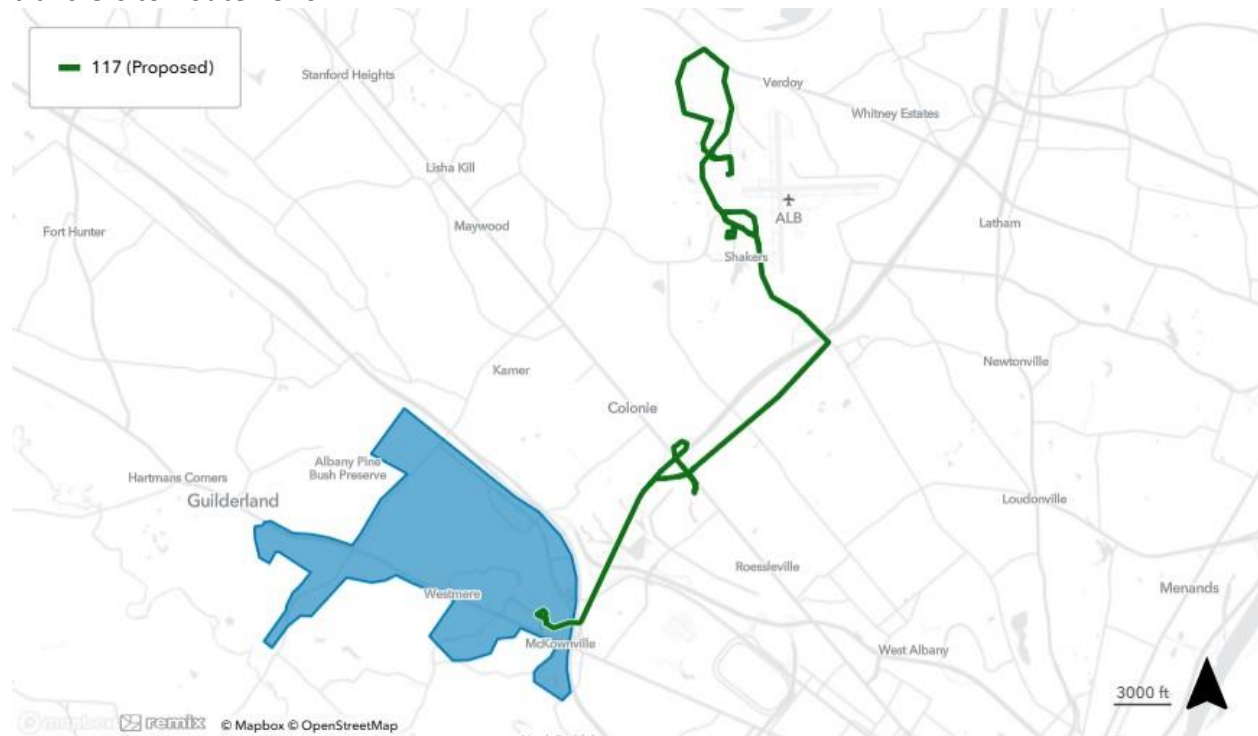


Figure 3: FLEX Guilderland and planned new routing of Route #117.

CDTA Title VI Policies

This section will describe CDTA's definitions and Title VI policies that will be applied in this Service Equity Analysis. These policies have been developed with input from the public as part of CDTA's three-year Title VI program, in accordance with FTA Circular 4702.1B.

Major Service Change and Fare Change Policy

Major Service Changes are defined as service changes that satisfy any of the following criteria:

- Add or eliminate more than 15.0% of CDTA system revenue hours.
- Add or eliminate more than 50.0% of the revenue hours of a trunk route, BusPlus route, or any other route that exceeds 10,000 annual revenue hours.

Exceptions to these criteria include:

- A temporary addition of service that lasts up to 12 months, including elimination thereof;
- Any route operating seasonally;
- Any shopping route;
- Rerouting due to circumstances beyond CDTA's control, including but not limited to road and/or lane closures, emergency service road blocks, flooding or roadway debris, or lack of winter maintenance including plowing, salting, and sanding that may lead to unsafe driving conditions.

A fare change is defined as an alteration to the price of any CDTA fare product, including both fare increases and fare decreases.

Any major service change or fare change shall "trigger" a service or fare equity analysis that requires approval by the CDTA Board of Directors.

The CDTA Board of Director's consideration, awareness and approval of the major service change and fare change policy is included in its resolution adopting the Title VI Program. That resolution can be found in Appendix C.

Because the FLEX Colonie/Guilderland/Latham zone operates roughly 27,000 annual revenue hours, and because the zone is mostly being eliminated, this plan is a major service change and has triggered this service equity analysis.

Analysis Procedure

1. CDTA will evaluate and analyze proposed major service changes and fare changes, in accordance with FTA Circular 4702.1B.

2. CDTA will evaluate the impacts of all service changes cumulatively when there is more than one route being affected in a major service change.
3. CDTA will use a mix of American Community Survey (ACS) block group and census tract data to evaluate and analyze major service changes and fare changes. This data will be analyzed in GIS software. CDTA will not use Remix's Title VI analysis tool in this case, since it cannot be used for microtransit.
4. CDTA will measure the impacts of service and fare changes on minority riders, to determine whether minority riders are bearing a disparate impact from the change between the existing service/fare and the proposed service/fare.
5. CDTA will measure the burdens of service and fare changes on low-income riders to determine when low-income riders are bearing a disproportionate burden of the change between the existing service/fare and the proposed service/fare.
6. At the conclusion of CDTA's analysis, if CDTA finds a disparate impact on the basis of race, color, or national origin, CDTA will analyze alternatives to mitigate any potential adverse effects of major service changes or fare changes with a disparate impact on minority riders.
7. If CDTA finds a disproportionate burden on low-income riders, CDTA will analyze alternatives to mitigate any potential adverse effects of major service changes or fare changes with this disproportionate burden.

Adverse Effects

CDTA has defined adverse effects as decreases to the level of service and/or the quality/presence of transit infrastructure, which are not offset and mitigated by corresponding improvements to the same factors. Level of service is determined by a quantitative evaluation of service spans, headways, and travel times, while quality of infrastructure is determined by a qualitative evaluation of waiting areas, pedestrian facilities, and traffic infrastructure.

Disparate Impact Policy

CDTA has defined disparate impacts as occurring when more than **30.0%** of the population bearing adverse effects belongs to minority groups.

This policy is designed to reflect populations that meaningfully exceed the service area average of 18.4% minority.

The CDTA Board of Director's consideration, awareness and approval of the Disparate Impact policy is included in its resolution adopting the Title VI Program. That resolution can be found in Appendix C.

Disproportionate Burden Policy

CDTA has defined disproportionate burdens as occurring when more than **20.0%** of the population bearing adverse effects belongs to low-income groups.

This policy is designed to reflect populations that meaningfully exceed the service area average of 10.4% low-income individuals.

The CDTA Board of Director's consideration, awareness and approval of the Disproportionate Burden policy is included in its resolution adopting the Title VI Program. That resolution can be found in Appendix C.

Service Equity Analysis Process

When conducting a service equity analysis, CDTA will work with Remix, using their Title VI Engine to generate a Title VI analysis of the service change. Remix's Title VI Engine calculates whether the change is an increase or decrease in service by multiplying the number of bus trips by the number of potential riders for each component of the service change. It then calculates the low income and minority percentages of that population. If the change is a decrease in service and the affected population is more than 30.0% minority, then the change is potentially a Disparate Impact. If it is a decrease of service and the affected population is more than 20.0% low income, then the change is potentially a Disproportionate Burden. If the service change is an increase in service, CDTA will ensure resources are not unfairly redistributed from protected communities to unprotected ones, which could indicate a disparate impact or disproportionate burden. In the case of a potential disparate impact or disproportionate burden, CDTA will then look into alternatives.

Policy for the Soliciting of Public Comment

If a major service change is planned, or a change in fares is proposed, the CDTA Board of Directors will authorize formal solicitation of public comment. A notice of the proposed change(s) will be published on buses, on the CDTA website, on CDTA social media, in relevant CDTA newsletters and distributed to existing community email lists. Such published notices will include the date, time and location of any public hearings or meetings, as well as information on how to attend the meeting virtually, if applicable. Not sooner than thirty days after the notices are published and posted at least one public hearing or meeting shall be held. Special promotional fares are not included in the requirements of this section.

CDTA will translate the abovementioned outreach materials, as well as materials used during public meetings, into, and provide translation services for, the language of any LEP language group as specified in the Language Assistance Plan upon request. When public comment is sought from a community in which the Language Assistance Plan identified a significant LEP population, all materials will be provided in English and Spanish by default.

A report of all public comments received and any responses will be provided to the Board of Directors. Recommended changes in the proposal as a result of public comment may also be presented. Following completion of this process, the Board of Directors may authorize the implementation of the changes or

may direct other action. Final public notice of major changes in service or any changes in the fare structure will be given via the methods stated above.

Analysis of Proposed Service Changes

Determining the change in CDTA's resources is relatively straightforward. This service change is a service decrease in terms of revenue hours of approximately 2,841 annual revenue hours.

Change	Net Annual Revenue Hours
Remove FLEX CGL	-~27,000
Add FLEX Guilderland	+~13,000
Remove old Route #117	-~4,290
Add new Route #117	+~15,449

However, determining the impact upon riders and disparate impact and disproportionate burden requires a little more creativity than past service equity analyses. Because of the differences between microtransit and fixed route service both in the meaning of one hour of service, and in their relationship to geography and service area, we decided instead to look at this change in terms of the average number of vehicles a place would see in a given weekday, Saturday, or Sunday. Because microtransit does not serve all people along a line or all locations within its zone equally, but instead serves people at specific points based upon requests, we chose to calculate the number of vehicles actually observed on a given day (Weekday, Saturday, or Sunday) at a given location within the analysis area. We used quarter mile hexagons instead of census tracts for our analysis geography, since a quarter mile is generally how far we assume someone is willing to walk to get to a bus stop. Each FLEX pickup and dropoff was counted as one vehicle observation for that hexagon, to be considered equal to one trip of a fixed route vehicle to that same hexagon. An average # of daily vehicles was calculated from this for each hexagon, for each day type. A total service gained or lost over a year is calculated by multiplying each day type by the number performed in fiscal year 2025 (254 weekdays, 52 Saturdays, 59 Sundays). Each hexagon is also joined with census tract information to determine its Title VI protection status. In the case where a hexagon overlaps with multiple census tracts, the percent poverty and percent minority of that hex was determined based upon all connecting census tracts. By this method, we determined each hexagon's Title VI protection status and whether it will experience a service increase or decrease.

Maps of places gaining or losing service are available in the Appendix.

Disparate Impact and Disproportionate Burden Determination

Using the above method, we estimate the following demographics of places gaining service and of placing losing service:

Places	Percent Minority	Percent Low Income
Gaining Service – Weekday	23%	9%
Losing Service – Weekday	25%	8%
Gaining Service – Saturday	23%	9%
Losing Service – Saturday	25%	8%
Gaining Service – Sunday	22%	9%
Losing Service - Sunday	25%	8%
Gaining Service Overall	23%	9%
Losing Service Overall	25%	8%

No area, whether gaining service or losing, or by any type of day, goes past the threshold for disparate impact (>30% minority) or disproportionate burden (>20% low income). Because of this, CDTA determines that this plan **does not create a disparate impact or disproportionate burden**.

Public Engagement

In order to fulfill CDTA's Title VI Program, CDTA conducted a public engagement meeting at Guilderland Public Library on 4/21/2025 to receive public input on this plan. The public was notified of the plan on April 7, 2025. The public was also notified of where to send comments and questions. An option to attend the meeting virtually was also provided. Approximately 27 people attended the meeting, including 7 people who attended virtually. CDTA received comments from 16 different people by email. The main themes of the public feedback were:

1. Request for more service at Albany County Jail and the SHIP Program
2. Request for service on Watervliet Shaker Road for BOCES students
3. A preference for FLEX's higher level of accessibility for people carrying heavy loads or people with disabilities
4. Concern over increased travel times, mainly due to transfers
5. Request for earlier service to get to work by 7 AM in Guilderland
6. Concern over loss of service on Fuller Road and Old Niskayuna Road
7. Many comments asked that we not reduce the FLEX area

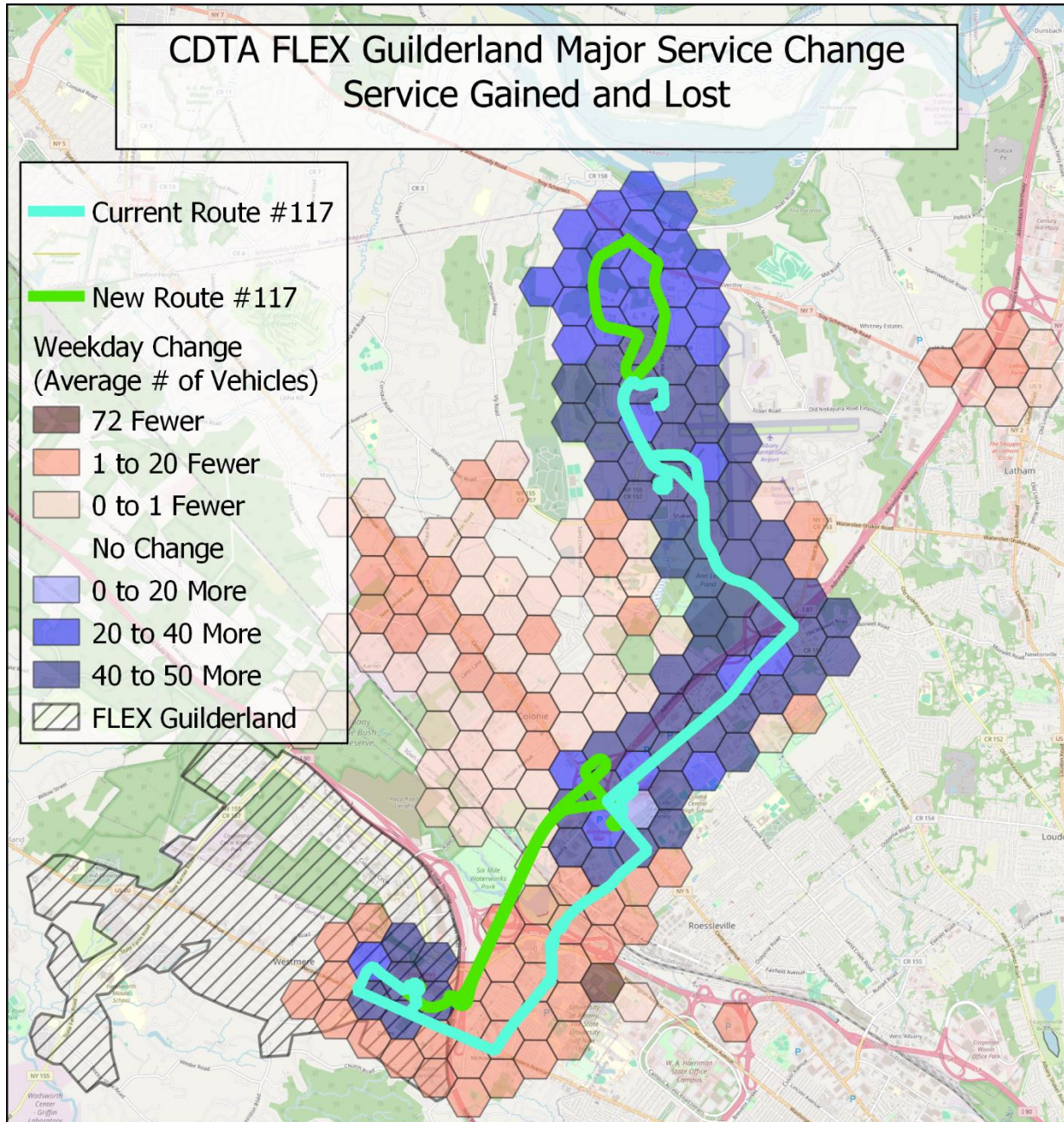
Because of this feedback, CDTA recommended to the board to make two changes:

1. Add a southbound trip on Route #117 at 5:30 AM to cover early commutes
2. Add two deviations on Route #117 to Albany County Jail

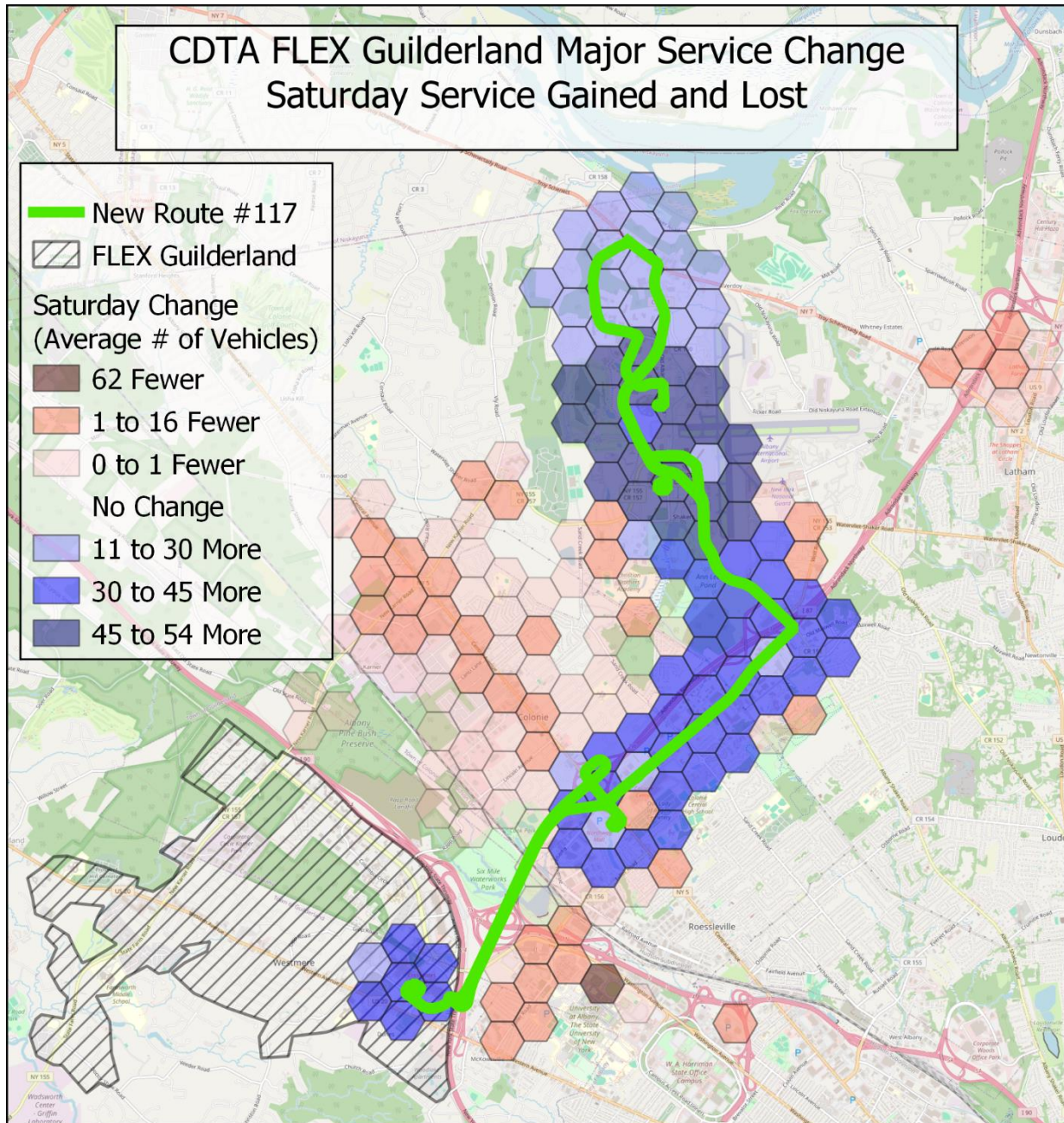
The board's resolution approving the analysis and the final plan is provided in Appendix C.

Appendix A

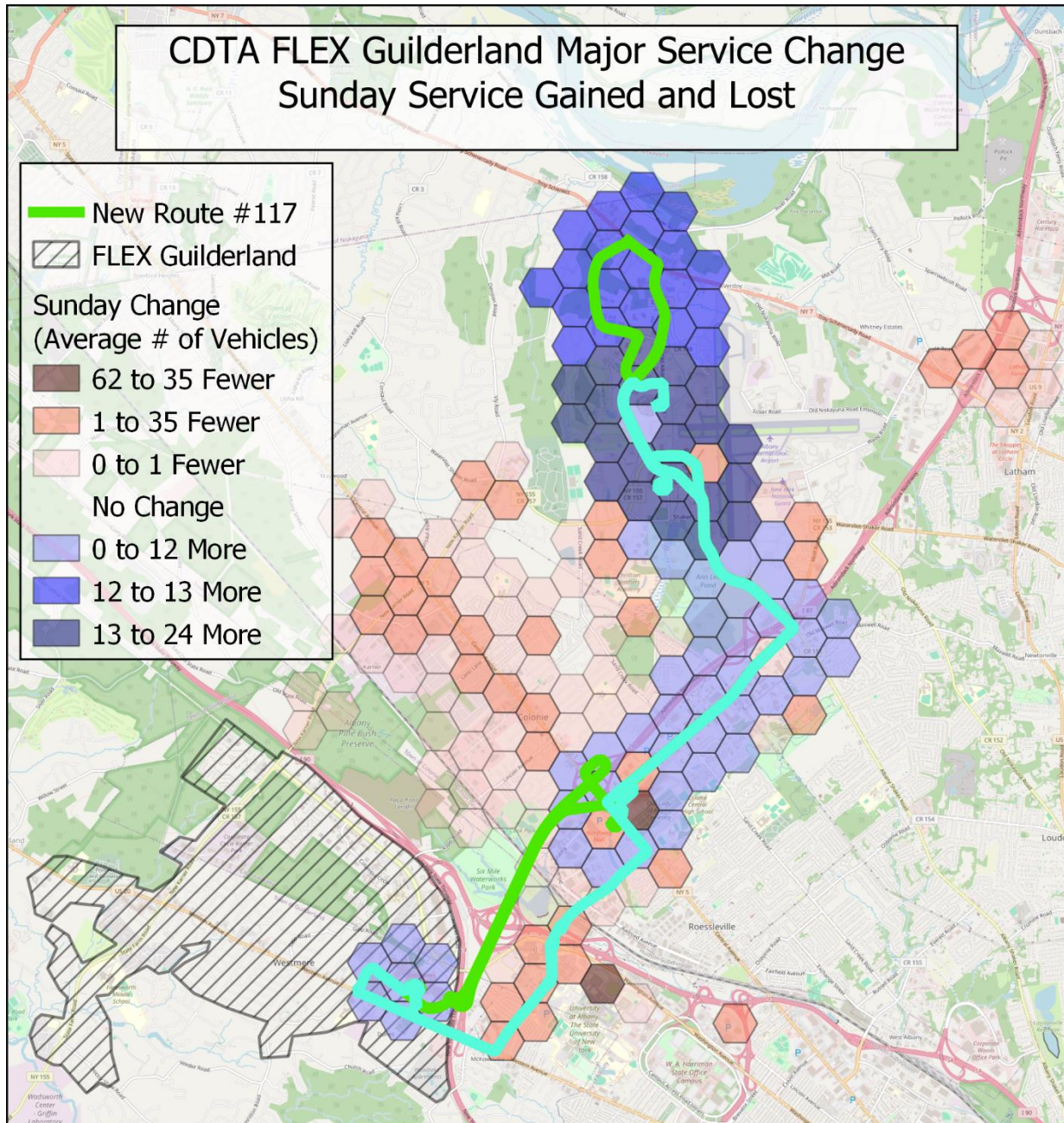
Quarter Mile Hexes Gaining or Losing Service – Weekdays



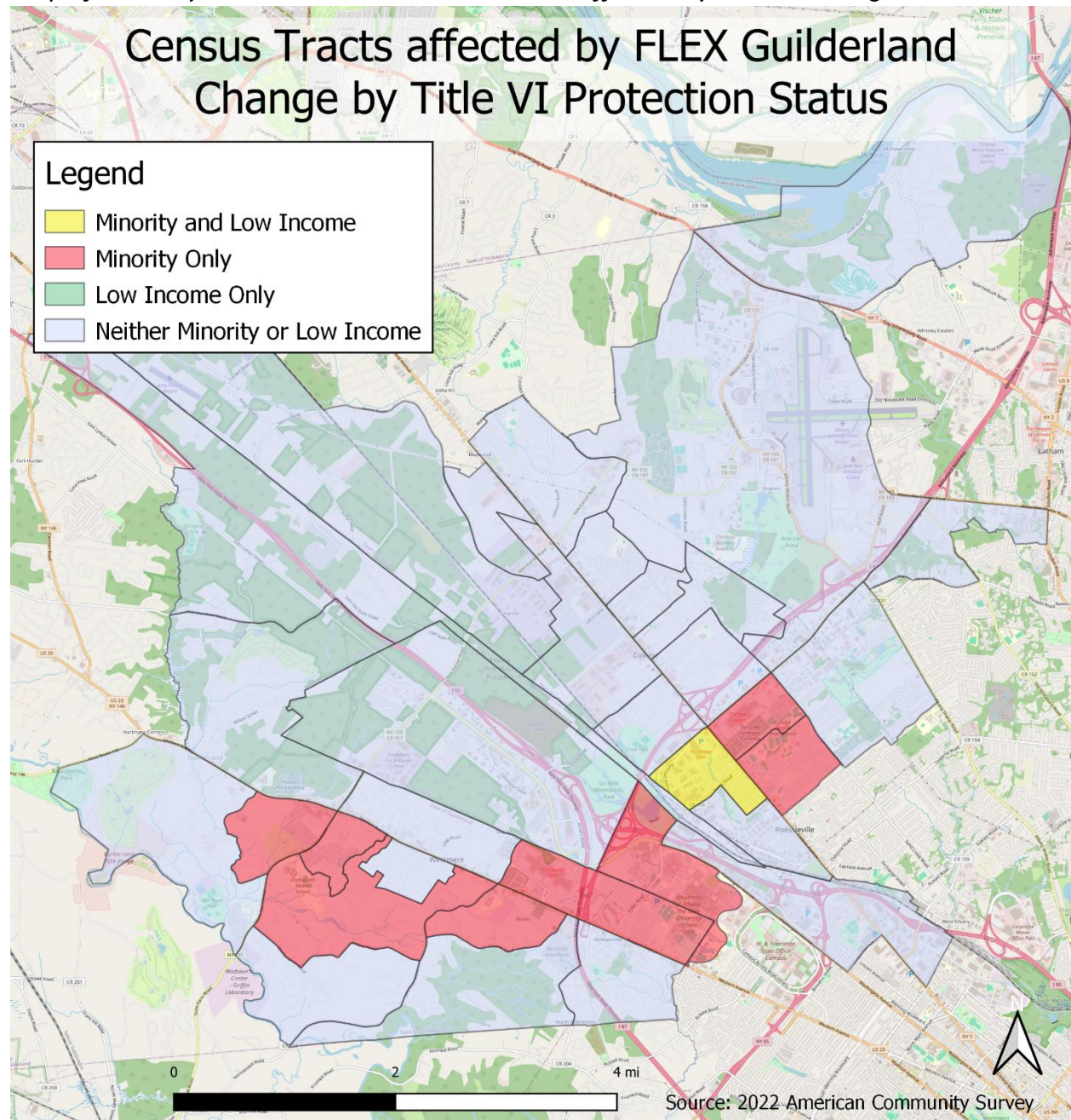
Quarter Mile Hexes Gaining or Losing Service – Saturdays



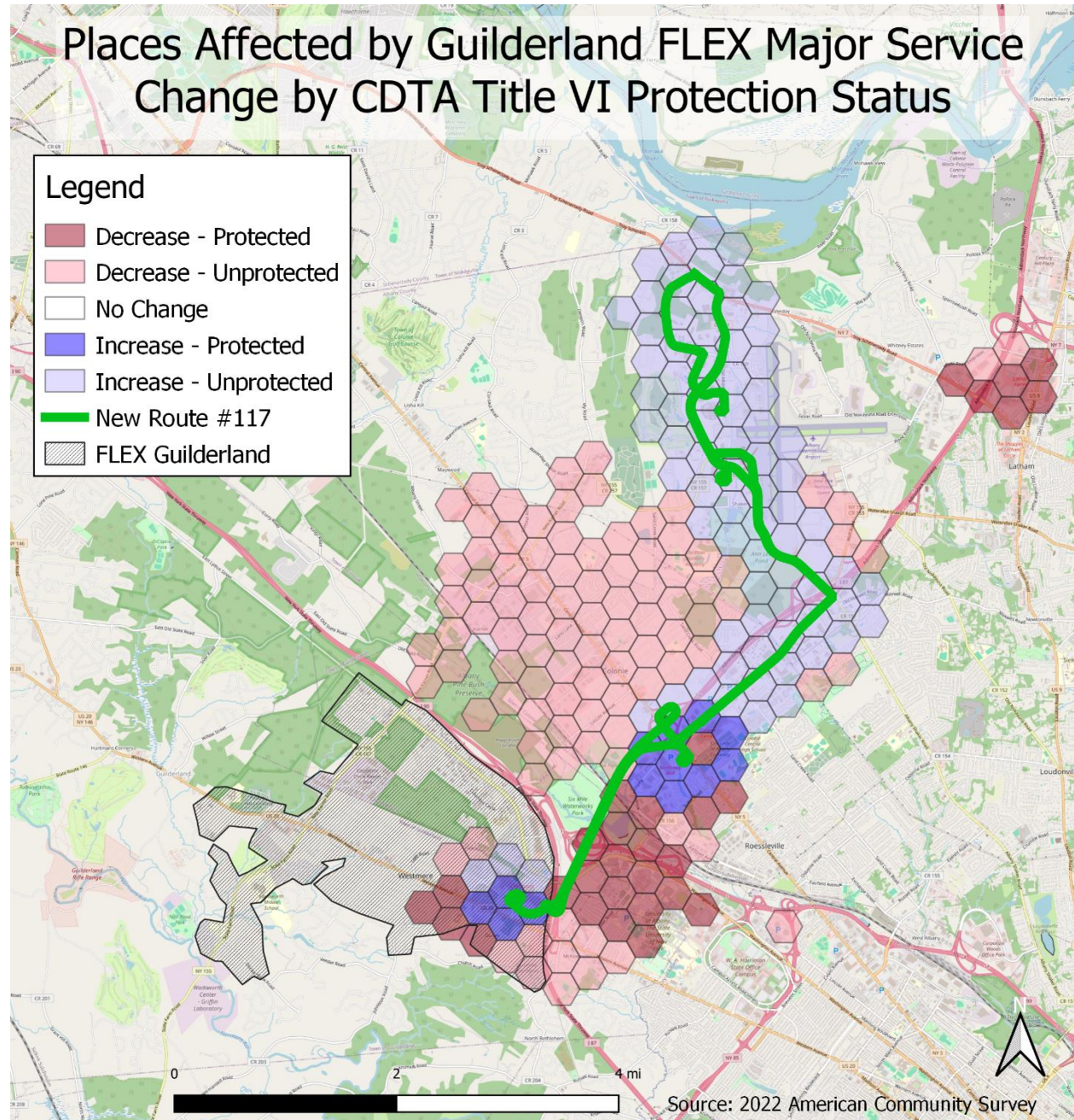
Quarter Mile Hexes Gaining or Losing Service –Sundays



Map of Minority and Low-Income Census Tracts Affected by Service Change



Map of Minority and Low-Income Quarter Mile Hexagons Affected by Service Change



Appendix B

CDTA Board of Directors Approval of Service Change Analysis

CAPITAL DISTRICT TRANSPORTATION AUTHORITY

RESOLUTION NO. 20 - 2025

Approval of Title VI Analysis for FLEX Service Changes

WHEREAS, the Capital District Transportation Authority (the “Authority”) is authorized by New York Public Authorities Law Section 1305 to formulate action plans and make any necessary amendments, including modification of routes and schedules, and

WHEREAS, the Authority currently operates FLEX on-demand transit service in the Capital Region, and

WHEREAS, the Authority now desires to modify FLEX service to include point-to-point service in certain areas, designed to make the service more efficient and to reduce customer wait times, and

WHEREAS, according to the Authority’s Title VI program, major service changes require a service/fare equity analysis, and

WHEREAS, the proposed changes exceed the threshold for being considered a “major service change”, and

WHEREAS, a public meeting regarding the proposed changes has been held, and comments were solicited and reviewed, and

WHEREAS, the Authority now desires to adopt the service changes, as attached, to be effective as of May 25, 2025.

NOW, THEREFORE, IT IS RESOLVED AS FOLLOWS:

1. The Authority adopts the annexed description of major service changes.
2. Authority staff is hereby authorized to make the service changes effective as of May 25, 2025.
3. This Resolution shall take effect immediately.

CERTIFICATION

The undersigned, duly qualified and acting as Secretary of the Capital District Transportation Authority, certifies that the foregoing is a true and correct copy of a resolution adopted at a legally convened meeting of the Capital District Transportation Authority held on 30th day of April, 2025.

Dated: April 30, 2025


Jaelyn L. Falotico, Secretary

Appendix C

CDTA Board of Directors Approval of Title VI Program

CAPITAL DISTRICT TRANSPORTATION AUTHORITY RESOLUTION No. 16 - 2025

Approve 2025-2028 Title VI Program

WHEREAS, the Capital District Transportation Authority (Authority) is charged with providing transit services within the Capital District Transportation District, and

WHEREAS, the Authority is subject to a number of state and federal statutes and regulations, including those found at 42 U.S.C. §2000 *et seq.* and 49 C.F.R. 21, and is further subject to the oversight of the United States Federal Transit Administration, and

WHEREAS, the Authority is required to develop and approve a comprehensive Title VI Program, to be submitted to the Federal Transit Administration for review every three years, and

WHEREAS, the Authority has reviewed and updated the Title VI Program, and after extensive review and discussion, now recommends the approval and submission of the 2025-2028 Title VI Program to the Federal Transit Administration.

NOW, THEREFORE, IT IS RESOLVED AS FOLLOWS:

1. The Authority hereby approves the 2025-2028 Title VI Program and directs its submission to the Federal Transit Administration.
2. This Resolution will not require any significant direct expenditure of public funds or result in any revenue.
3. This Resolution shall take effect immediately.

CERTIFICATION

The undersigned, duly qualified and acting as Secretary of the Capital District Transportation Authority, certifies that the foregoing is a true and correct copy of a resolution adopted at a legally convened meeting of the Capital District Transportation Authority held on the 26th day of March, 2025.

Dated: March 26, 2025


Michael J. Criscione, Vice-Chairman