

Title VI Equity Analysis

*Southern Brazoria County Transit Administrative and
Maintenance Facility*

December 2017



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Background and Project Description

The Gulf Coast Center (GCC) transit program, Connect Transit, has grown significantly in the past decade with the addition of fixed route bus services, Americans with Disabilities Act (ADA) paratransit services and commuter services to their previously operating demand response services. Connect Transit began fixed route services in 2010 in Brazoria County and established administrative offices at the existing Gulf Coast Center clinic in Angleton. Vehicles are stored in the open parking lot behind the building with no security. Maintenance and fueling is contracted to several contractors around the county.

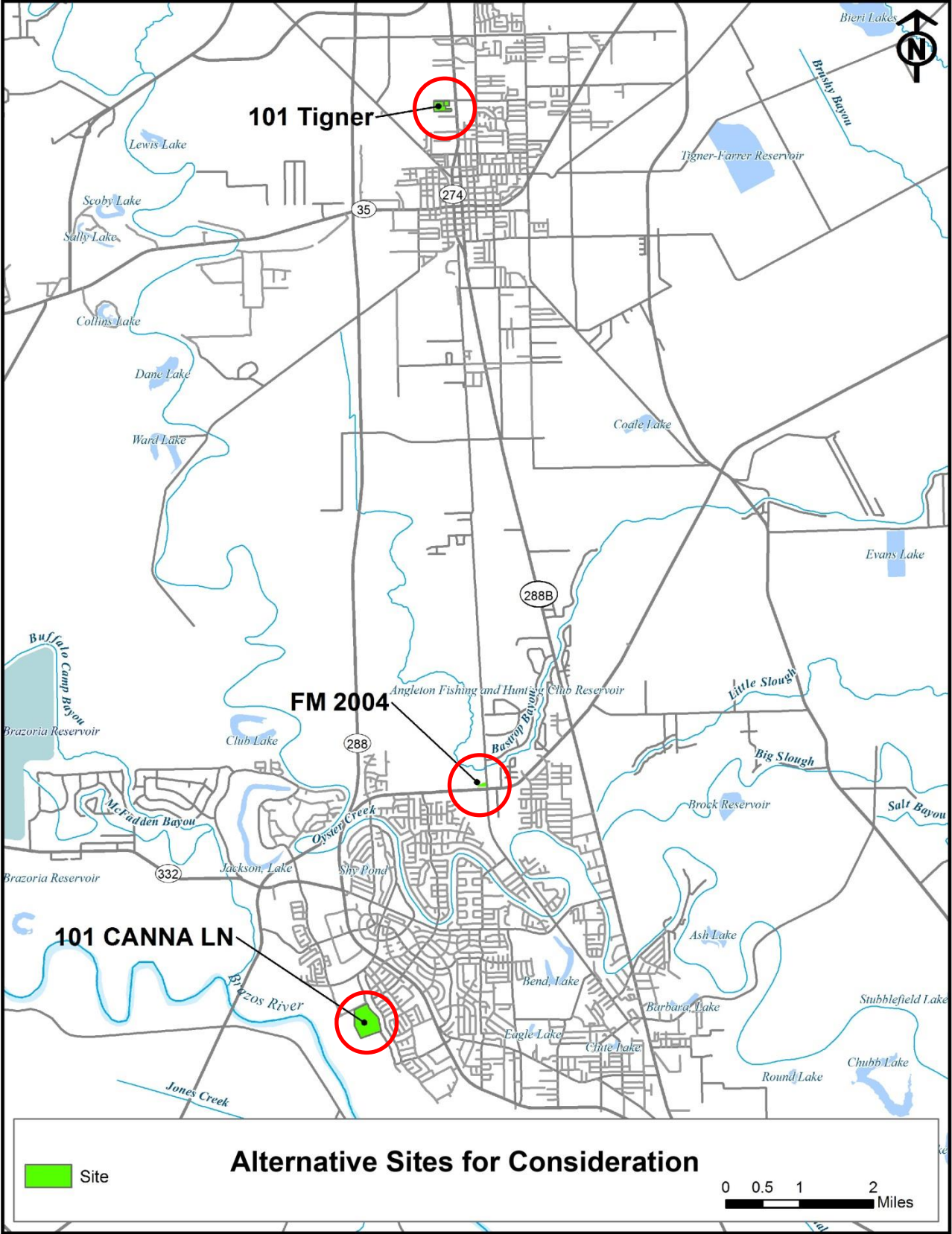
Connect Transit has outgrown their space at the clinic and needs an independent space to house administrative staff for Southern Brazoria County Transit (SBCT) and to provide a consolidated location for maintaining and cleaning the fleet. The City of Lake Jackson has recently offered to provide maintenance services for SBCT vehicles at their Dean Morgan Services Center, as well as space to build the administrative facility, other maintenance-related facilities, and bus storage yard on land available within the services center.

Study Purpose

The SBCT facilities require the acquisition or long-term lease of approximately one acre of property. The purpose of this study is to analyze the top three locations identified in the site selection analysis to ensure that the alternatives and final selected location were selected without regard to race, color, or national origin. This study also compares the equity impacts of the three alternatives. The following three candidate sites were evaluated for use by Gulf Coast Center/Connect Transit:

- 101 Tigner – up to 14 acres available in, and the adjacent area of, the current SBCT administrative offices/clinic location in Angleton
- 101 Canna – up to 59.7 acres available at the City of Lake Jackson Dean Morgan Services Center
- FM 2004 – up to 3.6 acres available for purchase off of FM 2004 and Old Angleton Road in Lake Jackson

As per the Federal Transit Administration (FTA) requirements in Circular 4703.1, Title VI equity analyses for the location of facilities must occur in the planning stage before a preferred site has been selected. Sites will be evaluated and ranked as part of the site selection analysis. The Title VI analysis represents just one of the criteria used in the evaluation.



Title VI Compliance Requirements

Gulf Coast Center/Connect Transit is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its transit services on the basis of race, color, or national origin, as protected by Title VI in FTA Circular 4702.1.B.

Title 49 CFR Section 21.5(b)(3) states, "In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part." Title 49 CFR Part 21, Appendix C, Section 3(iv) provides that "The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin."

Gulf Coast Center/Connect Transit is required to conduct a Title VI equity analysis to demonstrate that the facility is selected without regard to race, color, or national origin. Per guidance in the circular, the analysis must:

- Include outreach to persons potentially impacted by the siting of the facility
- Compare impacts of various siting alternatives
- Determine if cumulative adverse impacts might result due to the presence of other facilities with similar impacts in the area
- Occur before the selection of the preferred site

If disparate impacts are identified, the least discriminatory alternative must be implemented.

Site Selection Process

The new SBCT Administrative Facility and Bus Storage Yard must meet several important criteria:

- Deadhead Analysis indicating fewer wasted daily miles of travel by the fleet
- Environmental Conditions
- Surrounding Land Use
- Traffic Impacts
- Utility Availability and Drainage Ease
- Parcel Size (approximately one acre)
- Expansion Potential
- Historical Significance

- Availability and Ownership
- Site Equity Analysis
- Cost to Acquire

Connect Transit studied potential geographic locations and reviewed available properties that would have the adequate space for both the facility and storage yard and minimize the deadhead to existing bus routes. Connect Transit considered its current property and the City’s Dean Morgan Services Center, as well as other parcels in Lake Jackson.

Connect Transit conducted research of available properties in Lake Jackson currently for sale in the right geographic area and meeting the minimum criteria for the site selection. Two properties were identified that were currently owned by Gulf Coast Center in part or proposed to be donated, Connect Transit filtered through properties based on size and price.

No neighborhood in Lake Jackson was disqualified from the selection process. Race, color, and national origin of residents were not considered during the identification or evaluation of potential sites.

Benefits and Burdens Analysis

Connect Transit reviewed benefits and burdens of each site to determine any impacts that might adversely affect the community. There would be no displacement of residents or business at any of the three sites considered in this site selection. Each site has some residential properties within the surrounding area, but none immediately touching. However, there is some concern for adequately mitigating noise and traffic impacts.

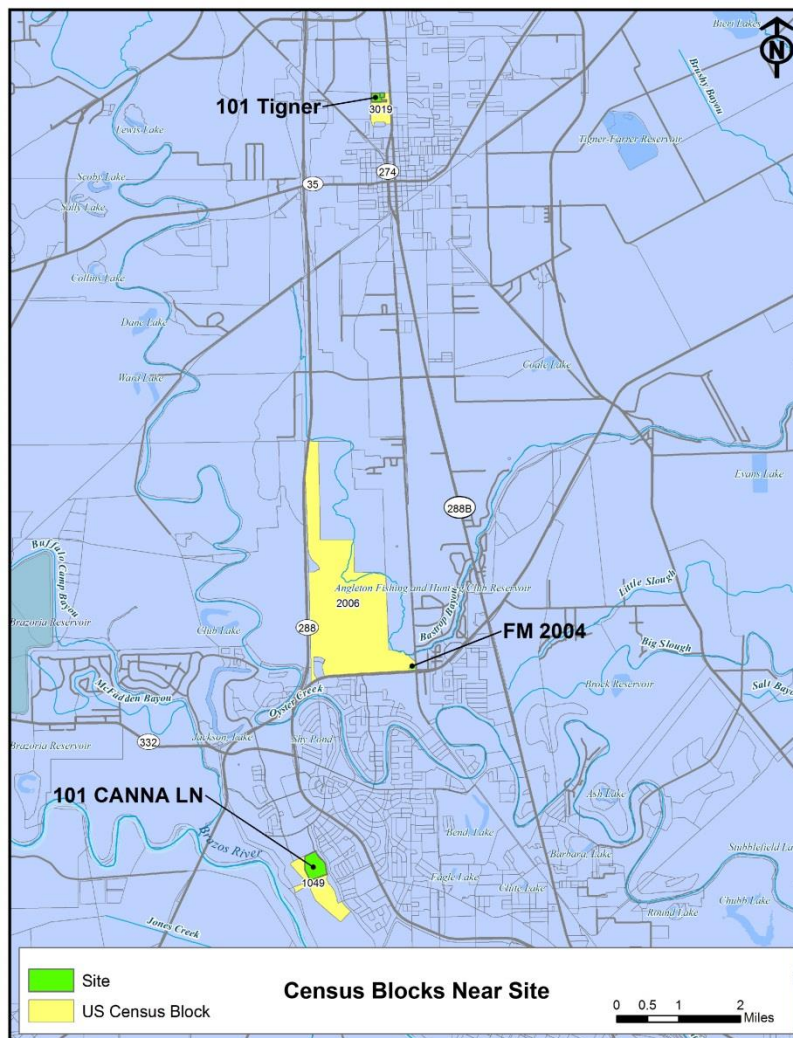
Table 1: Benefits and Burdens

<i>Benefits/Positive Impacts</i>	<i>Burdens/Adverse Impacts</i>
<i>101 Tigner</i>	
<ul style="list-style-type: none"> • Current location of staff and vehicle storage • Access to transportation corridors (FM 288B) 	<ul style="list-style-type: none"> • Significant deadhead to the routes • Residential properties consideration
<i>101 Canna</i>	
<ul style="list-style-type: none"> • On-site maintenance facility already constructed • Similar use of facilities currently operating on property • Significant property buffer surrounding potential location of bus storage yard • Reduced deadhead to the routes 	<ul style="list-style-type: none"> • Residential properties consideration
<i>FM 2004</i>	
<ul style="list-style-type: none"> • Centrally located for public access 	<ul style="list-style-type: none"> • Residential properties consideration

- Reduced deadhead to the routes
- Centrally located for public access and access to transportation corridors (FM 288B)

Alternatives Equity Analysis and Cumulative Impacts

While location, size, price, and other criteria were used to select the three candidate properties, Connect Transit analyzed demographics to ensure the site selection would have no disparate impact due to race, color, or national origin. Connect Transit looked at U.S. Census Tracts Block Groups of each property, which provide a larger snapshot of the surrounding areas' characteristics. As a comparison, Connect Transit reviewed similar demographics for Brazoria County as a whole since sites are in multiple cities within the county.



In Brazoria County according to the 2011-2015 American Community Survey 5-Year Estimates and 2016 American Community Survey 1-Year Estimates, 9.2% of individuals over the age of five have limited English proficiency, with 7.1% speaking Spanish at home; 25.3% of the population is not “White;” 9.6% of the population is below the poverty level; and the median income is \$69,749.

Table 2: Demographic Data

	101 Tigner	101 Canna	FM 2004	Brazoria County
	Block Group 3, Census Tract 6621	Block Group 1, Census Tract 6634	Block Group 2, Census Tract 6636	
Total Population	2,816	2,921	1,119	331,741
White	2,008	2,270	991	247,806
Non-White	808	651	128	83,935
Non-White Percentage	28.7%	22.3%	11.4%	25.3%
Population under Poverty Line	15	0	0	32,885
Percentage under Poverty Line	2.2%	0.0%	0.0%	9.6%
Median Income (Households)	\$69,390	\$84,750	\$97,143	\$69,749
Limited English Proficiency Percentage	4.6%	8.3%	0.0%	9.2%

Source: Data from U.S. Census Bureau 2011-2015 American Community Survey 5-Year Estimates, 2016 American Community Survey 1-Year Estimates.

Table 3: Equity Impact Comparison

	101 Tigner	101 Canna	FM 2004
Who would be impacted by selecting this site?	Not applicable - Current Site	Nearby residences	Nearby residences
Will selecting this site require displacement of residents or businesses?	No	No	No
Listed other similar facilities nearby including maintenance, storage, operations, etc.	None	Services Center with maintenance facility (on same site location)	Storage facility across FM 2004

Community Outreach

A public meeting will be conducted on Monday, December 18, 2017, from 3:00 to 6:00 p.m. at Southern Brazoria Community Service Center at 101 Tigner, Angleton, Texas 77515.