

Title VI Equity Analysis

Facility Site Selection

Custer County: Miles City, MT

January 31, 2023

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Background and Project Description

Since its inception in spring of 2019, Custer County Transit continues to operate out of borrowed office space at the Eastern Montana Event Center outside of the city limits and located on the far west side of the community. This location is a few miles from most of the medical facilities and grocery shopping areas (the two biggest demands for rides). The Transits fleet of 5 vehicles (3 vans and 2 ADA compliant buses) are parked outside the event center parking lot when not in use. In early FY22 the county commissioners approved the construction of a Transit addition adjacent to the new Custer County Firehall. The Transit wing is designed as a 50 x 80 extension to house the Custer County Transit. This wing expansion would be equipped with an office, ADA bathrooms, and this wing will be ADA accessible. Custer County is allotting 43,260 square feet of land (1 acre) for the Custer County Transit Office proper, with an additional space for access on the East and West side of the planned south wing addition in addition to room for public and employee parking. This space will be totally dedicated to Custer County Transit and will provide totally new office space for Transit employees, a shared wash bay for its vehicles, and an enclosed climate-controlled bay to park all Transit vehicles inside. The parking bay is a welcome addition for the Transit vehicles as it will help lower vehicle maintenance issues due to the extreme heat/cold temperature shifts through the fiscal year.

Custer County Transit had a major increase in rides between the 1st quarter of FY23 with around 200 rides a week to the 2nd quarters stats of over 300 rides a week. Despite the large increase in passengers Custer County Transit has also experienced a major increase in declines between these two quarters

from 60 declined rides a month for the 1st quarter to over 120 declines for the 2nd quarter. The Transit has also seen a major increase of rider requests during the 2nd quarter of FY23 due to harsh winter weather conditions including severe sub-zero temperature drops. These conditions caused havoc not only by incapacitating individuals' personal vehicles due to the cold, but the weather also influenced many Transit rider's decision not to drive due to poor road conditions.

Vehicle breakdowns during 2nd quarter FY23 (repair costs of over \$10K) and the subsequent maintenance downtime that followed have affected the local ride declines which then in turn sparked multiple canceled trips to Billings. The transit has experienced various issues with its two high-mileage Dodge vans and at one point having major oil leakage on both vans due to a common manufacturing flaw of a plastic part(s) affected by the constant heat/cold fluctuations from being parked outside in an austere environment for nearly 3 years. One of the Dodge vans sustained an internal catastrophic failure of its transmission towards the middle of the FY23's 2nd quarter. That vehicle was incapacitated and unable to be driven for almost three weeks while awaiting transmission replacement and dropped Transit van availability from 3 vans to 2. Around the same time the Transit also had multiple problems with its ADA compliant Ford Cutaway bus. This wheelchair capable vehicle has been down for over two months due to intermittent issues with the fuel management system to include the vehicles the wheelchair lift. Both of these issues were aggravated by cold weather. That particular vehicle issue prompted the transit to reach out to The Powder River Transit in Broadus Montana to borrow a wheelchair complaint vehicle to compensate for rides during the repair process.

With the constant fluctuating and rising construction costs between labor and building materials, Custer County now finds itself short of around \$100K short to finish the Transit addition. To properly get the Transit operating in its proposed office space, capital grant funds of around \$6K are also required to furnish the new additions Transit office space.

Public Involvement

Current and only public involvement includes the Custer County Transit Advisory Board members who meet quarterly and give input/feedback on the construction process. The primary lead for the construction process has been the Custer County Commissioners and the team managing the architecture and contractors' team.

Study Purpose

The Custer County Commissioners have shown their overwhelming support for the operation and success of the Custer County Transit project. When the donations and contributions fall short of the operational expenses the Custer County Commissioners have funded the program. They are dedicated to providing this service to the Custer County Community. In regards to the matching funds required for construction of the south wing expansion project of the Custer County Fire Hall for the Custer County Transit system, the Custer County Commissioners will through In-Kind match of the land value as well as capital expenditures that will make up the shortfall between donation and contributions from the community to the project to meet the required match for this capital improvement.

Title VI Compliance-

Custer County 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 Federal Transit Administration (FTA) Circular 4702.1.B.

Title 49 CFR Section 21.9(b)(3) states, "In determining the site of 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 9 CFR part 21, Appendix C, Section (3)(iv) provides, "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."

Montana Department of Transportation's Office of Civil Rights is required to conduct a Title VI equity analysis to ensure the location is selected without regard to race, color, or national origin. Per guidance in the circular, this 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; and
- Occur before the selection of the preferred site.

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

Site Selection Process

The Custer County Commissioners have built a County Fire Hall centrally located just north of the Pine Hills Correctional Facility. This is on property already owned by Custer County. The building plan was designed to be expanded, one wing to the north and one wing to the south. The Custer County Commission had the foresight to plan the expansion to include Custer County Transit. The south wing is designed as a 50 x 80 extension to house the Custer County Transit.

200 N Haynes Ave

Miles City, Mt 59301

Community Outreach

Currently there is no ongoing community outreach in reference to the Custer County Transit addition build.

Benefits and Burdens Analysis

The initial estimates for the south wing expansion were within \$625,000 mainly due to low steel costs, however steel prices experienced a large increase with additional increases expected. The current estimate should be within \$887,000 (includes price of land). This wing expansion would be equipped with an office, ADA bathrooms, parking bays for 4 possibly 5 vehicles, this wing will be ADA accessible. Custer County is allotting 43,260 square feet of land (1 acre) for the Custer County Transit Office proper, with an additional space for access on the East and West side of the planned south wing addition in addition to room for public and employee parking. Current valuation of the 1-acre commercial lot out of the flood plain according to Dawn Bolejak Broker/owner of Hardesty & Associates RE based on previous sales is \$62,000.

Table 1: Benefits & Burdens

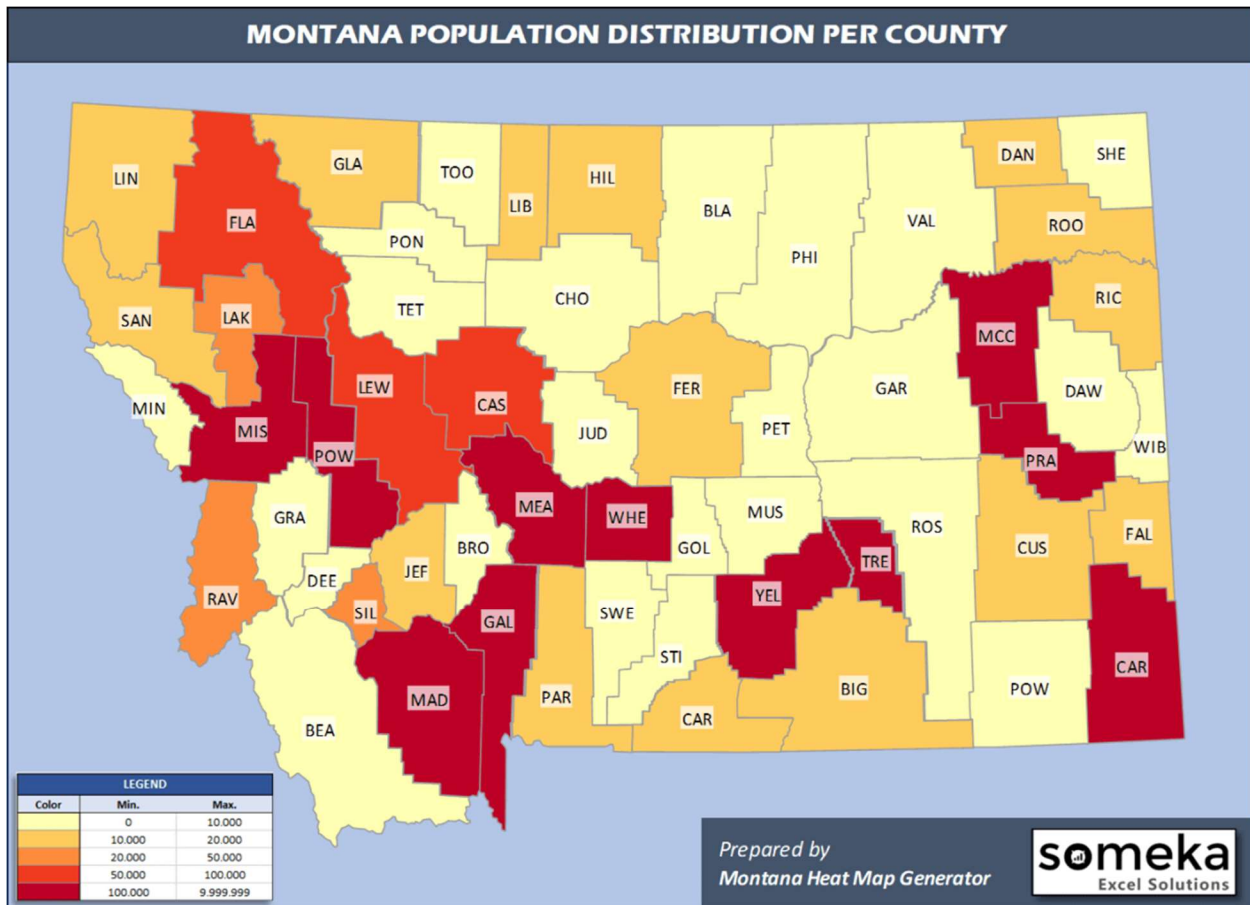
Site	Benefits/Positive Impacts	Burdens/Adverse Impacts
Custer County (Miles City) 200 n Haynes Miles City, Mt 59301	Custer County already owned the land. Pre construction took into factor in a new transit facility.	I do not see any burdens associated with this site.

Site Location Map

Custer County Transit

200 N Haynes

Miles City, Mt 59301



Population Estimates July, 2020 of Custer County Montana = 11,863

Alternatives Equity Analysis and Cumulative Impacts

While location, size, price, and other criteria were used to select the candidate sites, MDT analyzed demographics to ensure the site selection would have no disparate impact due to race, color, or national origin. MDT looked at U.S. Census Tract Block Groups 1 of the existing sites compared to demographics for the City of Miles City as a whole. Miles City has such a small service area that wherever they build, the comparison to the demographic data will be identical.

Table 2: Demographic Data

	Custer County Transit 200 N Haynes Miles City, Mt 59301 Block Group 2, Census Tract 962000, Custer County, Montana	
Total Population		8,432
White %		88.8%
Non-White %		10.2%
Percentage under Poverty Line		12.5%
Median Income (Households)		\$59,578.00
LEP %	0%	0%

Source: Data from U.S. Census 2020 Survey 5 Year Estimates

Conclusions

The location identified and evaluated for consideration for a new Custer County Transit Bus barn, Operations, and Maintenance Facility was selected without regard to race, color, or national origin. An evaluation of the poverty rate, minority population rate (non-white), and LEP rate for the site showed no adverse impacts. This site is in a block group 1.