



Title VI Equity Analysis

Operations and Maintenance Facility

Des Moines
Area Regional
Transit Authority

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November 25, 2020



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Background and Project Description

The Des Moines Area Regional Transit Authority (DART) is the largest public transit agency in Iowa. DART serves 12 member governments, including: Altoona, Ankeny, Bondurant, Clive, Des Moines, Grimes, Johnston, Pleasant Hill, Unincorporated Polk County, Urbandale, West Des Moines and Windsor Heights. DART was formed in 2006 and operates a family of transportation services in the Greater Des Moines region, connecting people to jobs, medical appointments, shopping, entertainment and more. DART maintains a fleet of more than 260 vehicles to provide four different services: Fixed Route (including 19 Local Routes, 7 Express Routes, 2 Shuttles and 1 Mobility on Demand zone), RideShare vanpools, Paratransit and On Call. The population of Des Moines is approximately 200,000 and the regional metro service area has a population of approximately 580,000. DART provides approximately 4.5 million unlinked trips each year.

The DART Way (DW) facility was constructed in 1977 to accommodate operations, maintenance, storage and administrative functions for the newly created transit authority MTA. An antiquated maintenance garage and the addition of two more buildings for bus storage and wellness have resulted in a site that is severely constrained



and inefficient to operate. The DW campus lies in a flood plain adjacent to the Raccoon River and has been subject to numerous major and minor flooding events.

The DW facility has expanded over the years and now consists of four main buildings completed between 1977 and 2010, totaling over 137,000 square feet and sitting on 12 acres of land. Due to space limitations, most of the administrative staff were moved to DART Central Station in 2012. The campus buildings, size and age are listed as follows: Operations and Maintenance Building 48,000 sq. ft., 1977; Bus Barn 55,000 sq. ft., 1977; Paratransit Barn & Wellness Center 19,000 sq. ft., 2001; and the South Barn 15,000 sq. ft., 2010. A wetland basin and storm water retention pond occupy eight acres to the west but building on the site is restricted. The land was recently sold to the City of Des Moines for a regional storm water system. The entire DW site is severely constrained geographically, with no feasible method of reconfiguration or expansion.

DART employed an A&E firm to complete a facility assessment in 2018 for the property. The existing facility presents many disadvantages and safety challenges.

- There is overall facility and system deterioration due to frequent flooding in the past, especially in the tunnel system that runs underneath the buildings.
- Staff must continually manage water pumps to keep the facility operational. This is especially important as DART is called upon for emergency evacuations for regional emergencies, such as the 2018 flash flooding incidents.
- The facility's electrical service and associated infrastructure is beyond its useful life and needs to be replaced and significantly upgraded to support DART's desired electric bus fleet.
- The existing paint booth is too small to accommodate a full bus, which means that vehicles must be dismantled, and individual panels carried into the booth to be painted. This is an extremely inefficient use of resources.
- The service lane creates a safety hazard as it is in the middle of the facility with no clear sight lines and forces staff to cross ice-covered pavement from the bus wash during the winter months, posing a significant safety risk.
- The construction of the original storage barn stymies logic in the excessive use of doors. As a result of this design, 68 doors are required to house 100 buses. These doors are extremely narrow and require the operator to fold in the mirrors upon entrance or exit, which poses a significant safety risk.
- The storage barn will need to be replaced in its entirety in order to accommodate new technology buses due to height restrictions. Anything taller than a standard diesel bus will not fit in the original storage barn. DART's hybrid electric buses are currently stored in the small storage addition completed in 2010. DART's battery electric buses that will arrive in spring 2020 will be stored in the Paratransit barn, which is a pole barn and will need to be replaced as well in the next 10 years.
- The developer who owns the land directly east of DART is also the same developer to the west who is building more than 1,700 residential units adjacent to the DW



facility. DART is essentially landlocked with no room to improve the efficiency of the facility or for necessary growth.

- As discussed above, the entire DW Facility lies in a flood plain and the facility has experienced flooding on numerous occasions. In 1993, the entire facility was under water and over the past several years the DW facility has experienced several water events on a lesser scale. Most recently, the Midwest had one of the wettest years on record in 2018, and as a result, DART was a FEMA recipient for flash flooding and electrical surges that damaged the DW facility.

Considering the need for significant investment to bring DW into a state of good repair, the operational limitations of the site, the site's location next to the river and the frequency of flooding, DART's A&E firm recommends that the agency construct an expanded facility on an appropriately sized site, rather than spend in excess of \$35 million needed in repairs over the next 10-20 years to remain at the existing property and still fail to mitigate the operational and environmental constraints.

As part of the feasibility study, five (5) potential sites were identified that could meet DART and the community's current and future needs. Privately owned sites for sale were not identified at this time and the existing site at 1100 DART Way was identified as a potential site if adjacent property is acquired.

Study Purpose

As part of the assessing of potential sites, DART intends to acquire real estate. Numerous sites have been investigated, and one site in particular at E25th Street and Maury Street in Des Moines has risen to the top.

The purpose of this Title VI Equity Analysis is to analyze potential sites for a new facility to discuss the balance of factors that went into site selection and demonstrate that a preferred location was selected without regard to race, color, or national origin. The study also compares the equity impacts of all of the sites:

1. West of Fleur – Multiple parcels are owned by the City of Des Moines with adjacent parcels privately owned. Publicly and privately-owned parcels may have to be combined to make a workable site geometry. The site and adjacent roadways are prone to frequent flooding making access difficult.
2. E 15th St. and Maury St. – Multiple parcels are owned by the City of Des Moines with adjacent parcels privately owned. Publicly and privately-owned parcels may have to be combined to make a workable site geometry. Maury St. divides the site into two parts and the facilities would have to be split on both sides of the street, reducing functionality and safety.
3. 1100 DART Way (Existing Facility) – Property is owned by DART. Property adjacent to the site is quickly transitioning into neighborhoods and multi-family residential. Additional land would have to be acquired to accommodate operational needs.



4. E 25th St. and Maury St. – Property is currently owned by the Des Moines Wastewater Reclamation Authority and the City of Des Moines. This site is the preferred location due to its size, availability, and proximity to downtown Des Moines.
5. E 30th St. and Maury St. – The property is privately owned and would have to be purchased. There is a high level of ambiguity of availability, cost, and condition of the site.

Per FTA 4702.1B, Title VI Equity Analyses for the location of facilities must occur in the planning stage before a preferred site has been selected. Sites have been evaluated and ranked as part of the DART facility site assessment process.

Title VI Compliance

DART 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.

DART 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 person 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 and Assessment Process

DART undertook a formal “New Facility Needs Assessment and Programming” which established base criteria for the site search by the project team. This assessment would



accommodate DART's current and future needs. Based upon the criteria, the team established that a new facility would need a minimum of 20 acres, with a maximum of 25 acres.

Proximity to DART Central Station is also an important criterion that guided the initial process of identifying potential sites for further consideration.

Site Identification Process

Initial Site Identification Criteria:

- Size: 20 – 25 acres of contiguous land
- Publicly or privately owned
- Single or multiple parcels that could be combined into single parcel
- Proximity to DART Central Station (less than 4 miles to minimize deadhead costs)

The project team contacted City of Des Moines staff and local real estate professionals for assistance in identifying sites that met the Initial Site Identification Criteria. Privately owned sites for sale could not be identified at this time. Five potential sites were identified. Race, color, and national origin were not considered during the identification or evaluation of potential sites.

In addition to the Initial Site Identification Criteria, the project team established additional criteria to guide and inform the search process for a site.

The additional criteria are:

- Proximity to DART Central Station
- Ease of access, traffic, surrounding roadway conditions
- Neighborhood compatibility
- Environmental Impact
- Site configuration: (3:1 rectangle is best)
- Acquisition Cost
- Development Cost
- On Bus Route (current or planned)
- Utility condition
- Flood Plain and site drainage
- Geotechnical conditions
- Sustainable Design and Operation opportunities

Based on these factors, the site at E 25th Street and Maury Street in Des Moines was identified as the preferred location for the new Operations and Maintenance facility.

Benefits and Burdens Analysis

DART reviewed the benefits and burdens of each of the potential locations to determine the impact of a new facility. There are various benefits and burdens to each location



reviewed. None of the potential sites require displacement of residences, but some of them do neighbor existing residential housing. Some of the potential sites do have structures that would potentially have to be demolished.

Site	Benefits/Positive Impacts	Burdens/Adverse Impacts
West of Fleur / 2201 George Flagg Pkwy.	<ul style="list-style-type: none"> • Close proximity to downtown transit center (DART Central Station) 	<ul style="list-style-type: none"> • Site is in a flood plain • Main access road (Fleur Dr.) floods frequently
E. 15 th St. and Maury St.	<ul style="list-style-type: none"> • Compatible with surrounding areas 	<ul style="list-style-type: none"> • Site configuration is not ideal; facility would have to be on 2 sides of an existing street • Near residential neighborhood
1100 DART Way (Existing Facility)	<ul style="list-style-type: none"> • Close proximity to downtown transit center (DART Central Station) • Currently owned by DART 	<ul style="list-style-type: none"> • Site is in a flood plain • Site is landlocked and facing neighboring developmental pressures • Site currently has many operational challenges
E. 25 th St. and Maury St.	<ul style="list-style-type: none"> • Compatible with surrounding areas • Property is owned by Wastewater Reclamation Authority and acquisition would be smooth • Potential bus service to facility and neighboring residential area 	<ul style="list-style-type: none"> • 2 structures currently on property that would need to be demolished • Near residential neighborhood
E. 30 th St. and Maury St.	<ul style="list-style-type: none"> • Compatible with surrounding areas • Potential bus service to facility and neighboring residential area 	<ul style="list-style-type: none"> • Existing private business with structures on site • Unknown site conditions • Near residential neighborhood

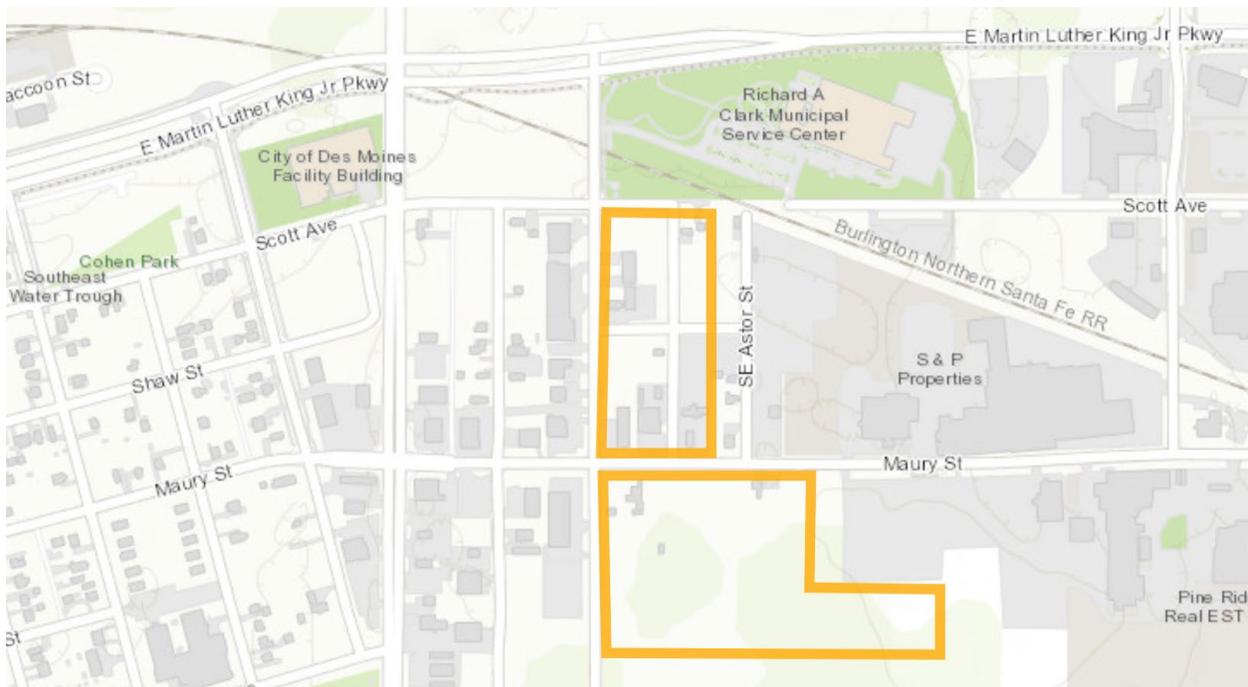


Site Location Maps

2201 George Flagg Pkwy – (Site 1)

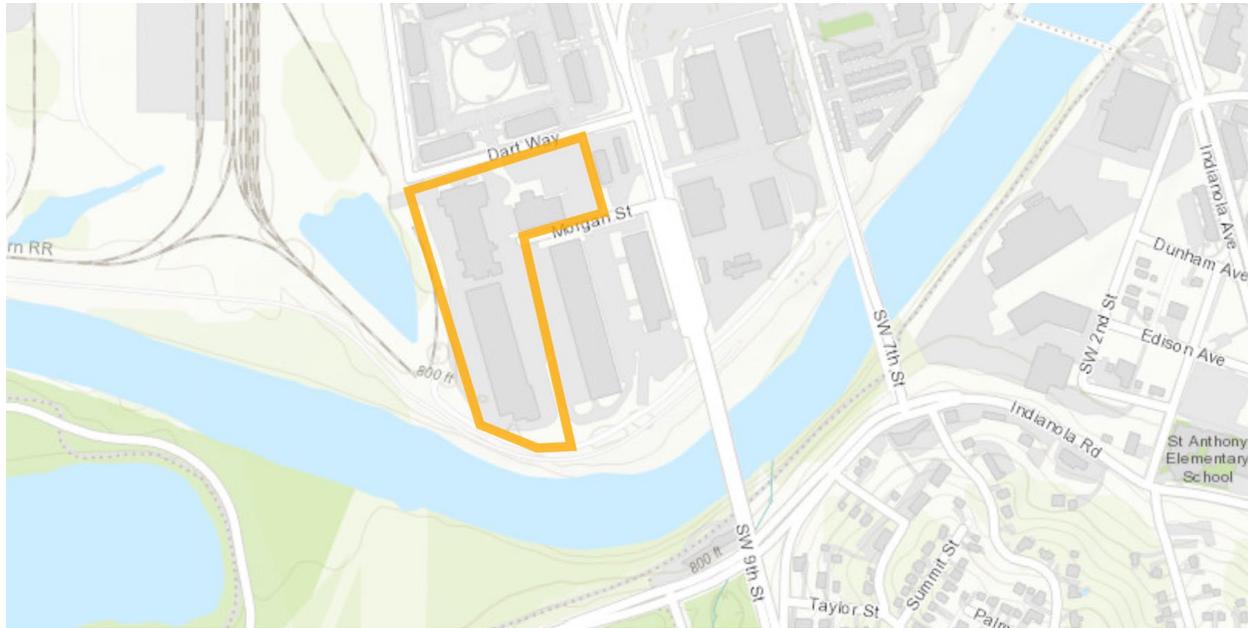


603 SE 15th St – (Site 2)





1100 DART Way – (Site 3)

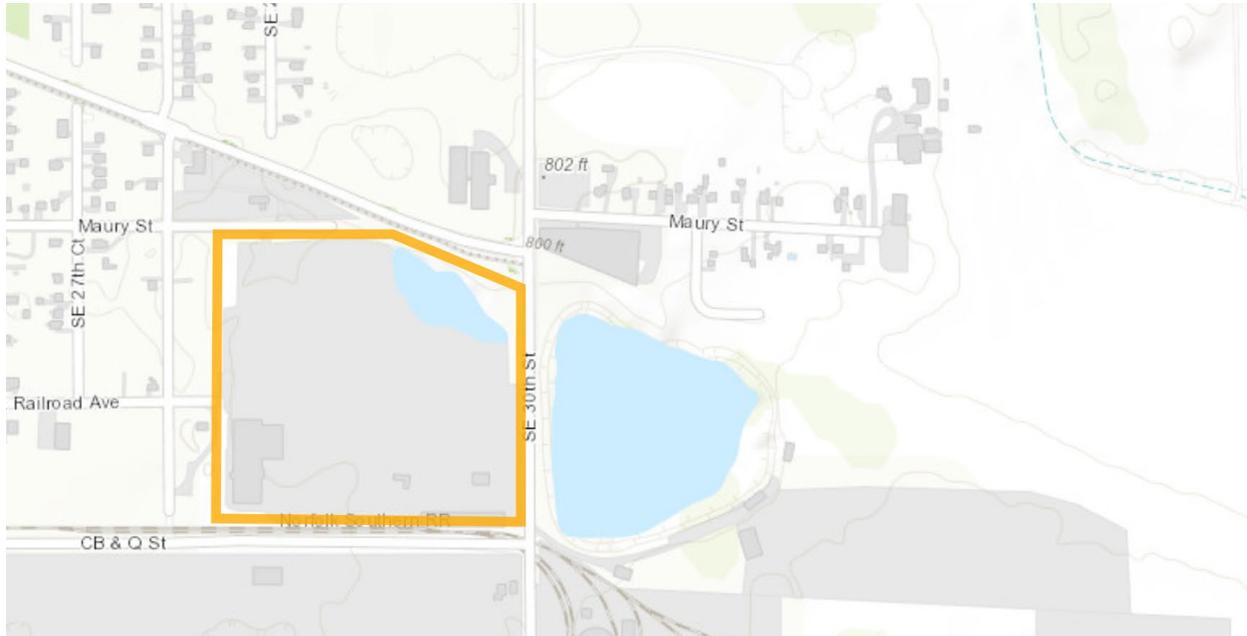


2501 Maury St – (Site 4)





2825 Maury St – (Site 5)





Alternatives Equity Analysis

Below is a comparison of various demographic factors for the Census block group that each candidate site is located within. The demographics for Polk County as a whole are listed in the right-most column and highlighted in green. Any corresponding demographic statistic for a candidate site that is 5 percentage points or more greater than Polk County as a whole is highlighted in yellow. A 5% threshold was used for consistency with DART's Disparate Impact and Disproportionate Burden policies.

	2201 George Flagg Pkwy Block Group 191530040011, Census Tract 40.01	603 SE 15th St Block Group 191530052003, Census Tract 52	1100 DART Way Block Group 191530051004, Census Tract 51	2501 Maury St Block Group 191530053001, Census Tract 53	2825 Maury St Block Group 191530053001, Census Tract 53	Polk County
Total Population	4,769	3,063	6,156	2,526	2,526	474,274
White	2,688	1,101	3,552	1,349	1,349	370,282
Non-White	2,081	1,962	2,604	1,177	1,177	103,992
Non-White %	43.6%	64.1%	42.3%	46.6%	46.6%	21.9%
Population under Poverty Line	1,198	903	1,083	320	320	51,725
Percentage under Poverty Line	26.7%	29.9%	17.9%	12.8%	12.8%	11.1%
Median Income (Household)	\$47,471	\$32,433	\$31,052	\$41,477	\$41,477	\$67,432
LEP %	8.1%	21.0%	9.8%	8.6%	8.6%	6.2%

Every candidate location for DART's new maintenance facility is located within a census block group with a non-white population that is significantly higher than the non-white population of Polk County as a whole. Three out of five candidate locations are in census block groups with a significantly higher proportion of households with incomes below the poverty line compared to Polk County as a whole. One candidate location is within a census block group with a significantly higher proportion of households with limited English proficiency compared to Polk County as a whole.

This analysis demonstrates that while the preferred site at E 25th St. and Maury St. has a significantly higher proportion of non-white residents living nearby, that would also be true of every other candidate location.



These findings are likely due to the general demographics of the area best suited for the Operations and Maintenance facility. The population of the City of Des Moines, and in particular of the areas in proximity to downtown that are zoned appropriately, generally have a higher proportion of minority and low income residents compared to Polk County as a whole.

Cumulative Impacts Analysis

Below is a discussion of the potential cumulative impacts of each proposed site.

- **2201 George Flagg Pkwy:** This location is adjacent to light industrial land uses as well as regionally significant open space.
- **603 SE 15th St:** This location is adjacent to light industrial, residential, and commercial land uses.
- **1100 DART Way:** This is the location of the existing DART maintenance facility. It is surrounded by residential, retail and light industrial land uses. There is a significant amount of housing being built on nearby parcels, which will likely lead to increased traffic on some streets used to access the site.
- **2501 Maury St:** This location is adjacent to residential, light industrial, and automotive land uses.
- **2825 Maury St:** This location is adjacent to residential, light industrial, and automotive land uses.

All of the proposed locations are in areas that are not densely populated. The existing light industrial and automotive uses do not significantly contribute to decreased air quality or contribute to high levels of traffic. The addition of a DART maintenance facility to any of the above locations would not contribute to significant cumulative impacts.

Community Outreach

The DART Commission has discussed the general need for a new maintenance facility and a funding plan on several occasions in publicly accessible and properly noticed meetings and workshops. DART also conducted targeted outreach to residents and business owners near the preferred location of the new O&M facility consistent with DART's Public Participation Plan. The objectives of the public outreach was to inform and solicit feedback from those who might possibly be impacted by the construction and operation of the proposed facility.

Specifically, residents and businesses within 1 mile radius of the site of the proposed facility site at E 25th St. and Maury St. were sent a letter which explained the background on the project, details on how the site could be repurposed to fit DART's needs, and some renderings of what the facility could look like and how buses would arrive at and leave the site. This letter also invited residents to provide input on the proposed project by:

- visiting DART's website and completing a short online survey,
- calling DART Customer Service, or
- attending one of two socially distanced, events at the proposed site on Oct. 12, 2020 and Oct. 15, 2020.



This letter was sent to all addresses in the area in both English and Spanish because the area has a large number of Spanish speaking households. In addition, it was noticed that several homes in the area were rental properties, so DART staff secured a list of property owners' addresses for the region and sent the letters to them as well.

The information in the letter was also shared on the DART website, along with a link to an online survey. This way, residents unable to attend the meeting would be able to learn more online and provide direct feedback through the survey.

Along with promoting the small in-person meetings through the letter, the events were also promoted through three, yard signs (1 large barn sign, 2 typical yard sign) which were installed at the site approximately 5 days before the first meeting. At the events, a small number of DART staff were on site with a table and materials to share more information about the proposed project and collect direct feedback about the site. All attendees were asked to complete a print version of the online survey, and their responses were entered into the survey so that all responses could be combined for comparison.

Public Input Received

DART received six survey responses completed both online and in-person and general comments from two individuals who called and spoke with DART Customer service. The feedback is enclosed, and includes the following highlights:

- 3 people expressed interest in community space inside the building
- 2 people expressed interest in a community garden
- Several expressed concern regarding general traffic in the area and were pleased the buses would be traveling on Maury Street.

In response to this feedback, DART is considering project design elements that could help the facility better fit into the character of the neighborhood and meet local needs, including:

- Allowing for community use of meeting space in the new facility
- Internal bus circulation between washing, fueling and bus storage areas

These elements are included in the preliminary design of the facility, but the ultimate design and function of the facility will depend on cost and other factors.

Conclusions and Substantial Legitimate Justification

The preferred new location for DART's operations and maintenance facility has a higher proportion of non-white residents living nearby compared to Polk County as a whole. This could result in a disparate impact to minority residents.



An evaluation of the poverty rate, minority population rate (non-white), and LEP rate for the five sites that were considered for the new facility showed that each site under consideration would have one or more impacts on disadvantaged communities. The preferred site would potentially disproportionately impact minority households, but not low-income or LEP households.

While there may be additional sites in the region that meet some of the selection criteria for a successful operations and maintenance facility, given the demographics of the area any additional sites of the size, zoning, availability and proximity to downtown needed would likely have similar impacts to minority and low-income communities as those studied.

In conclusion, DART believes that there is substantial legitimate justification for the selection of the site at E 25th St. and Maury St. for its new operations and maintenance facility for the following reasons:

- The preferred site meets the site selection criteria, including parcel size, availability, proximity to downtown and roadway access.
- There was not an alternative site identified that would avoid locating the new operations and maintenance facility in proximity to higher than average populations of non-white residents, likely due to demographic and land use characteristics of the region.
- The preferred site avoids disproportionately burdening low-income populations, since other candidate locations had higher concentrations of families experiencing poverty living nearby.
- Design elements have been identified in response to concerns and requests from the community, including the potential for community use of a meeting room and internal bus circulation.
- The location of the operations and maintenance facility could result in new revenue bus service to the neighborhood, which would be an asset for local residents.