

REGIONAL TRANSIT ISSUE PAPER

Agenda Item No.	Board Meeting Date	Open/Closed Session	Information/Action Item	Issue Date
7	09/08/14	Open	Action	08/26/14

Subject: Approving Sacramento Regional Transit District's Title VI Analysis of the Blue Line to Cosumnes River College Light Rail Extension

ISSUE

Whether or Not to Approve Sacramento Regional Transit District's Title VI Equity Analysis of the Blue Line to Cosumnes River College Light Rail Extension.

RECOMMENDED ACTION

Adopt Resolution No. 14-09-_____, Approving Sacramento Regional Transit District's Title VI Equity Analysis of the Blue Line to Cosumnes River College Light Rail Extension.

FISCAL IMPACT

None.

DISCUSSION

The Federal Transit Administration (FTA) requires a Title VI equity analysis prior to the beginning of revenue service for any New Starts funded project. In accordance with this requirement, staff has prepared a Title VI analysis of the Blue Line to Cosumnes River College (CRC) light rail extension, which is currently under construction and is scheduled to begin revenue service in September 2015 (Exhibit A).

The purpose of a Title VI equity analysis is to determine if major service changes will result in unintentional discrimination against minority or low-income populations. The analysis is prepared according to a methodology developed with public involvement by RT in accordance with FTA guidelines. Service improvements, such as the Blue Line extension, may still have discriminatory effects if minority or low-income populations receive a reduction in total benefits relative to non-minority/non-minority populations. The attached analysis finds, however, that this will not be the case. In fact, the project is expected to result in a substantial increase in benefits to minority and low-income populations relative to non-minority/non-low-income populations.

At this time, no major bus changes are planned to accompany the light rail extension (except for necessary adjustments to bus/rail connection timing). If major bus service changes are made coincident with the beginning of revenue service, staff will amend this analysis to include the overall result of bus and light rail changes.

Staff recommends the Board adopt the attached resolution approving RT's Title VI analysis of the Blue Line to CRC light rail extension. A copy of the resolution will be provided to FTA following approval, in accordance with RT policy.

Approved:

Presented:

Final 9/2/14

General Manager/CEO

AGM of Planning & Transit System Development

J:\Board Meeting Documents\2014\15 September 8, 2014\Blue Line to CRC.Title VI.IP.doc

RESOLUTION NO. 14-09-_____

Adopted by the Board of Directors of the Sacramento Regional Transit District on this date:

September 8, 2014

**APPROVING SACRAMENTO REGIONAL TRANSIT DISTRICT'S TITLE VI
EQUITY ANALYSIS OF THE BLUE LINE TO COSUMNES RIVER COLLEGE
LIGHT RAIL EXTENSION**

WHEREAS, the Sacramento Regional Transit District (RT) is a recipient of financial assistance from the Federal Transit Administration (FTA) and is thereby subject to Title VI of the Civil Rights Act of 1964 and the United States Department of Transportation's (DOT's) implementing regulations; and

WHEREAS, in accordance with DOT's implementing regulations, the Board of Directors adopted written procedures consistent with FTA guidance for evaluating, prior to implementation, any and all service changes that exceed RT's major service change threshold, to determine whether those changes will have a discriminatory impact based on race, color, or national origin, set forth in Resolution 13-08-0124; and

WHEREAS, FTA guidance specifies that transit providers that have implemented or will implement a New Starts capital project shall conduct a service and fare equity analysis six months prior to the beginning of revenue operations; and

WHEREAS, on December 27, 2012, RT executed a Full Funding Grant Agreement under the FTA's New Starts program for construction of the Blue Line to Cosumnes River College light rail extension, which is currently under construction, and which is expected to begin revenue service in September 2015; and

WHEREAS, staff has prepared a service equity analysis in accordance with RT's written procedures; and

WHEREAS, no fare changes are being implemented as a result of the Blue Line to Cosumnes River College project.

**BE IT HEREBY RESOLVED BY THE BOARD OF DIRECTORS OF THE
SACRAMENTO REGIONAL TRANSIT DISTRICT AS FOLLOWS:**

THAT, the Board of Directors has reviewed, is aware of, and approves the equity analysis for the Blue Line to Cosumnes River College light rail extension project as set forth in Exhibit A; and

THAT, the Board of Directors finds that the Blue Line to Cosumnes River College light rail extension will not result in any disparate impacts on minority populations or any disproportionate burdens on low-income populations, as defined in Resolution 13-08-0124.

PHILLIP R. SERNA, Chair

A T T E S T:

MICHAEL R. WILEY, Secretary

By: _____
Cindy Brooks, Assistant Secretary

DATE: August 26, 2014
TO: File
FROM: James Drake, Service Planner JD
SUBJ: Title VI Equity Analysis of the Blue Line to CRC light rail extension

Pursuant to RT's major service change policy and in accordance with federal Title VI requirements, the purpose of this memorandum is to identify and document any potential Title VI issues related to the Blue Line to CRC light rail extension, which RT is expected to begin operating in September 2015.¹

Based on the minority and low-income composition of expected riders, this analysis finds that there will be no disparate impacts or disproportionate burdens as a result of the project, as shown in the attached worksheet on Page 10.

Project Background

In 2013, RT began construction on the South Sacramento Corridor Phase 2 light rail extension project, otherwise known as the Blue Line to CRC light rail extension. The Blue Line to CRC light rail extension is an extension of RT's Blue Line light rail service which currently runs from Watt I-80 light rail station to Meadowview light rail station.

Blue Line service currently operates on weekdays with 15 minute peak and midday headways from 4:16 a.m. to 12:47 a.m., on Saturdays with 30 minute headways from 4:29 a.m. to 12:32 a.m., and on Sundays with 30 minute headways from 5:02 a.m. to 10:32 p.m. A map and weekday schedule for the extension are available on Pages 5-7.

Title VI Requirements

This memorandum is intended to satisfy the requirements set forth in FTA Circular 4702.1B, Chapter IV, Section 7. Under this section, as a New Starts project, the Blue Line extension is required to undergo a Title VI service equity analysis prior to the commencement of revenue service, which is expected in September 2015.²

FTA also requires a fare equity analysis of any fare changes that accompany a New Starts project; however, there will be no such changes.

¹ RT's major service change policy is stated in Resolution 13-08-0125. The Federal Transit Administration's (FTA's) guidance related to Title VI of the Civil Rights Act of 1964 and Executive Order 12898 is specified in FTA Circular 4702.1B, which was published and which became effective on October 1, 2012.

² RT is required to conduct a service equity analysis prior to implementing any major service change. RT policy defines all light rail extensions as major service changes. So even if FTA did not explicitly require a service equity analysis for the Blue Line extension as a New Starts project, an equity analysis would still be required under RT policy.

Land acquisition and construction impacts of this project were evaluated in RT's June 2011 Supplemental Final Environmental Impact Statement/Environmental Impact Report, which was included in RT's Title VI program update, approved May 12, 2014.

Bus Service Changes

RT's first South Line extension in 2003 was accompanied by numerous changes to bus service. If RT introduces any bus changes at the same time as the CRC extension begins revenue service, these changes would need to be evaluated in combination with the light rail extension; however, no such changes are planned.³

If RT's bus service plans change so that any changes in level of service are undertaken coincident with the beginning of revenue service for the CRC extension, this analysis will be updated to reflect the effects of the combined bus and light rail changes. If major service changes are made to RT's bus network after the beginning of revenue service, those will be covered in a future Title VI analysis.

The remainder of this memorandum consists of a Title VI service equity analysis of the Blue Line to CRC light rail extension. Maps of the RT service area indicating heavy concentrations of minority and low-income populations have been provided on Pages 8 and 9.

Methodology

Per RT policy, a Title VI equity analysis quantifies the net benefits or adverse impacts of a project and to compare the demographics of the project beneficiaries (or impacted populations) with the demographics of RT's overall ridership. Impacts are assumed to result from changes in the level of service, which are quantified in terms of vehicle revenue miles (or train miles, in the case of light rail). The Blue Line extension consists strictly of benefits, i.e., it consists strictly of service level increases, with no service level reductions; however, it is possible for a strictly beneficial project to have a discriminatory effect if non-minority or non-low-income populations receive a disproportionate share of

³ As the project map shows, the alignment of the CRC extension is not redundant with any bus service. The east/west segment along Cosumnes River Boulevard will run parallel to Route 56 on Mack Road; however there will be approximately one mile route spacing between the two routes. Based on heavy local ridership along Mack Road on Route 56, there is no expectation that service levels should be reduced on Route 56. RT staff expects that the CRC extension will capture some riders from Route 56; however, this is expected to have a beneficial outcome, as the primary problems with Route 56 are currently overcrowding and schedule adherence due to excessive ridership. Route 5 on Valley Hi Drive also runs parallel to the light rail extension for approximately one mile; however, the overall function of the route is unchanged by the light rail extension. Prior to 2005, RT operated a number of long-distance express buses from Elk Grove to Downtown Sacramento; however, these routes have been operated by the City of Elk Grove since the formation of their e-Tran service in 2005, with no involvement from RT, and are therefore beyond the scope of RT's Title VI requirements. Numerous bus routes will undergo schedule adjustments as a result of the CRC extension to ensure well-timed connections with trains and other buses; however, these types of changes do not amount to changes in level of service and are categorically excluded from service equity analyses, per RT's Service and Fare Change Policies.

the benefits. It is therefore the objective of the analysis to determine whether or not the Blue Line extension confers benefits in a discriminatory manner.

On-Board Survey Data

In April 2013, an on-board passenger survey was conducted aboard RT buses and light rail trains. Passengers on randomly selected trips on all RT bus and light rail routes completed a self-administered questionnaire on various rider characteristics.⁴

A total of 1,003 passengers on the Blue Line were surveyed, of which 307 passengers provided a home zip code in areas likely to indicate South Line use, i.e., residence in South Sacramento or Elk Grove.⁵ The study assumes these respondents are representative of future riders of the Blue Line to CRC extension. Valid responses were received for 273 passengers with regard to income and household size. Valid responses were received from 296 passengers with regard to ethnicity.

Minority Ridership

FTA defines a minority person as anyone who is American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, or Native Hawaiian or other Pacific Islander.

Based on 2013 on-board survey results, 81.1 percent of riders on the Blue Line to CRC extension are expected to be minority persons.⁶ RT's baseline data has shown that for the overall fixed-route system, an estimated 69.0 percent of passengers are minority persons, according to the same methodology.

RT's Service and Fare Change Policies specify that for a major service change, an aggregate adverse difference exceeding 15 percent constitutes a potential disparate impact⁷. Since the Blue Line to CRC extension is expected to have a greater rate of minority ridership than RT's overall system, *there are no potential disparate impacts from implementing the Blue Line to CRC light rail extension*. In fact, the Blue Line to CRC extension will result in a significant net benefit to minority populations in RT's service area.

⁴ Existing passenger demographics were used instead of household demographics for three reasons. First, barring any major differences in demographics between households in the existing service area and households in the new service area

⁵ Zip codes included 95624, 95757-58, 95817-20, 95822-24, 95828-29, 95831-32.

⁶ 240 of 296 responses.

⁷ Resolution 13-08-0125 adopted August 26, 2013.

Low-Income Ridership

FTA defines a low-income person as a person whose household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines. The HHS definition varies by year and household size. For the purpose of this analysis, RT's 2013 on-board survey used HHS poverty guidelines from 2013. Survey participants were asked their household size and their household income from a list of ranges. For the purposes of these calculations, the participant's income was assumed to be the midpoint of the range selected.⁸

Based on RT's 2013 on-board survey, 60.1 percent of riders on the Blue Line to CRC extension are expected to be low-income persons⁹. For the overall RT system, 53.0 percent of riders were found to be low-income, according to the same methodology.

RT's Service and Fare Change Policies specify that for a major service change, an aggregate adverse difference exceeding 15 percent constitutes a potential disparate impact. Since the Blue Line to CRC extension is expected to have a greater rate of low-income ridership than RT's overall system, *there are no potential disparate impacts from implementing the Blue Line to CRC light rail extension*. In fact, the Blue Line to CRC extension amounts to a significant net benefit to low-income populations in RT's service area.

Conclusions

Based on the analysis set forth above, staff finds that implementation of the Blue Line to CRC light rail extension will not cause any disparate impacts on minority populations or disproportionate burdens on low-income populations.

The attached Service Change Equity Analysis worksheet includes a summary of key statistics.

c: RoseMary Covington, AGM of Planning & Transit System Development
Sarah Poe, Assistant Planner

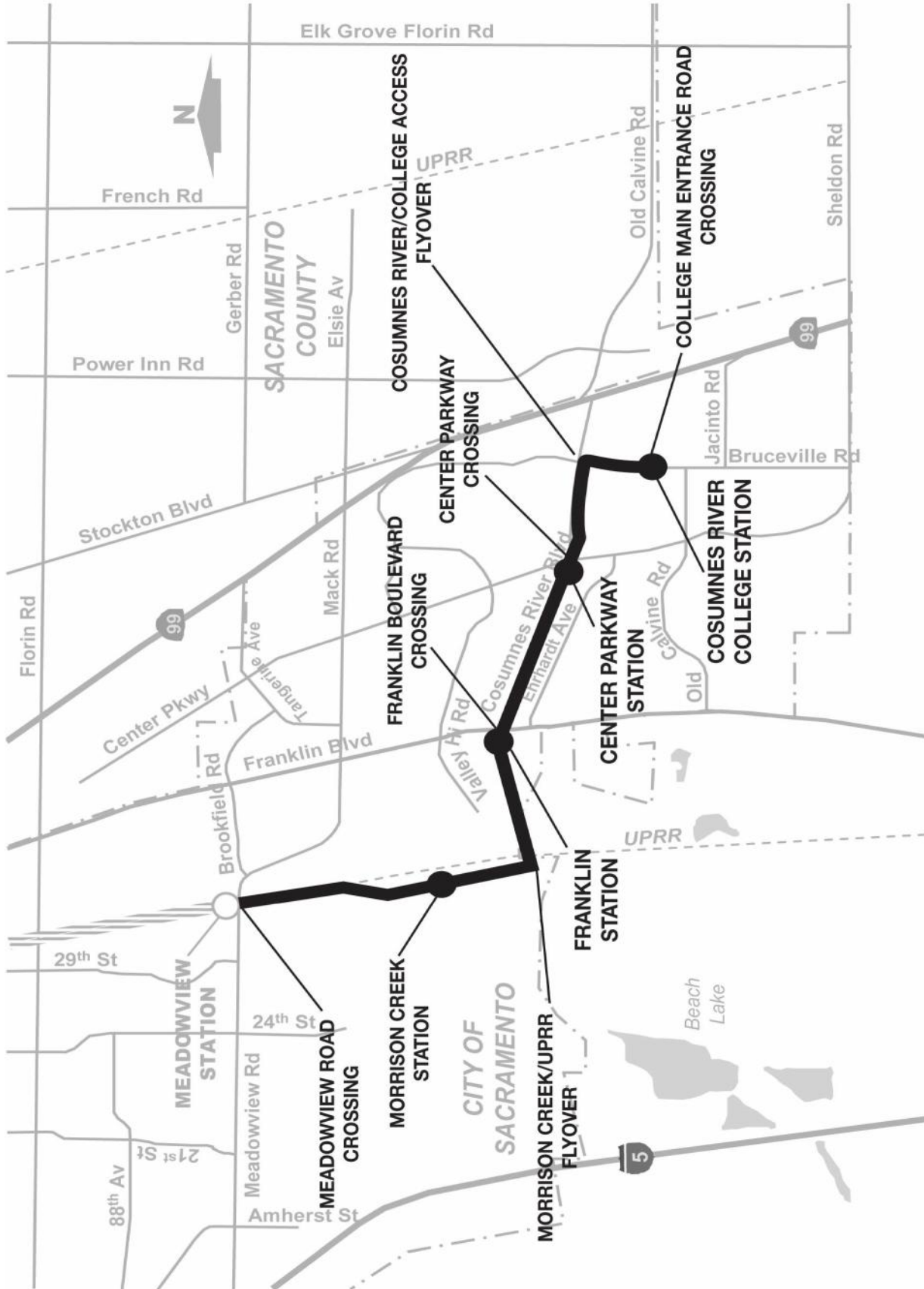
⁸ For example, if a passenger selected a household income range of \$25,000 to \$35,000, that passenger's income was assumed to be \$30,000 for the purposes of this analysis.

⁹ 164 of 273 valid responses.

Passenger Demographics

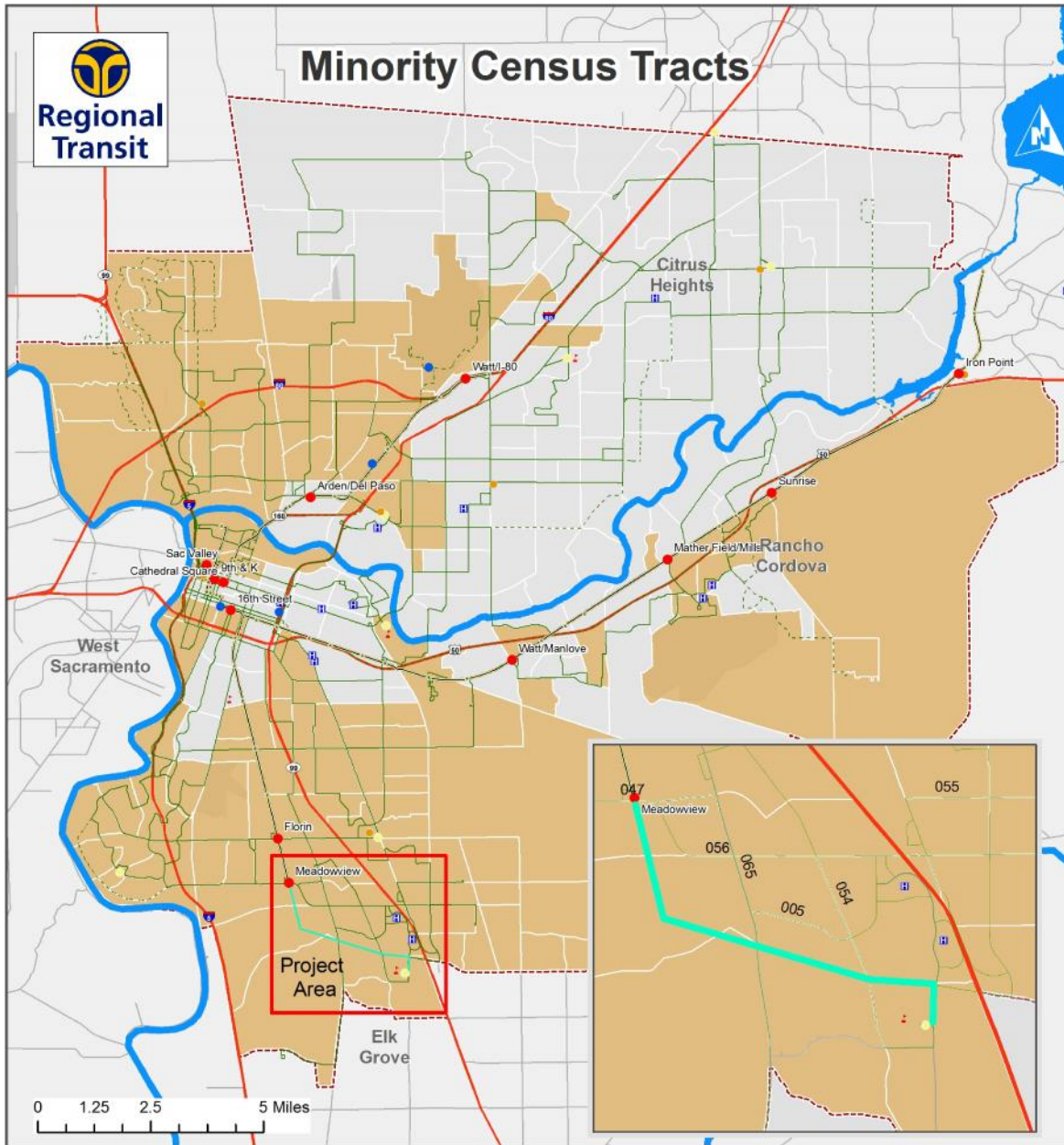
	Blue Line to CRC Extension	RT System
Minority Persons	81.1%	69.0%
Low-Income Persons	60.1%	53.0%

Source: 2013 On-Board Survey



DRAFT LIGHT RAIL TIMETABLE											WEEKDAYS	Effective: 9/4/15	
CONSUMERS RIVER COLLEGE BOUND													
TRN #	WATT/80	MARC	PLATF	ARDN	ALK FLT	ST ROSE	16TH	CITY COL	FLOR	MDW	FRANK	CRC	Trn #
1	Depart Swanston @ 3:53			3:57	4:05	4:11	4:19	4:27	4:34	4:36	4:42	4:47	1
2	Depart Swanston @ 4:12			4:16	4:24	4:30	4:38	4:46	4:53	4:55	5:01	5:06	2
3	Depart Swanston @ 4:27			4:31	4:39	4:45	4:53	5:01	5:08	5:10	5:16	5:21	3
4	Depart Swanston @ 4:42			4:46	4:54	5:00	5:08	5:16	5:23	5:25	5:31	5:36	4
5	Depart Swanston @ 4:57			5:01	5:09	5:15	5:23	5:31	5:38	5:40	5:46	5:51	5
6	5:03	5:09	5:10	5:16	5:24	5:30	5:38	5:46	5:53	5:55	6:01	6:06	6
7	5:18	5:24	5:25	5:31	5:39	5:45	5:53	6:01	6:08	6:10	6:16	6:21	7
8	5:33	5:39	5:40	5:46	5:54	6:00	6:08	6:16	6:23	6:25	6:31	6:36	8
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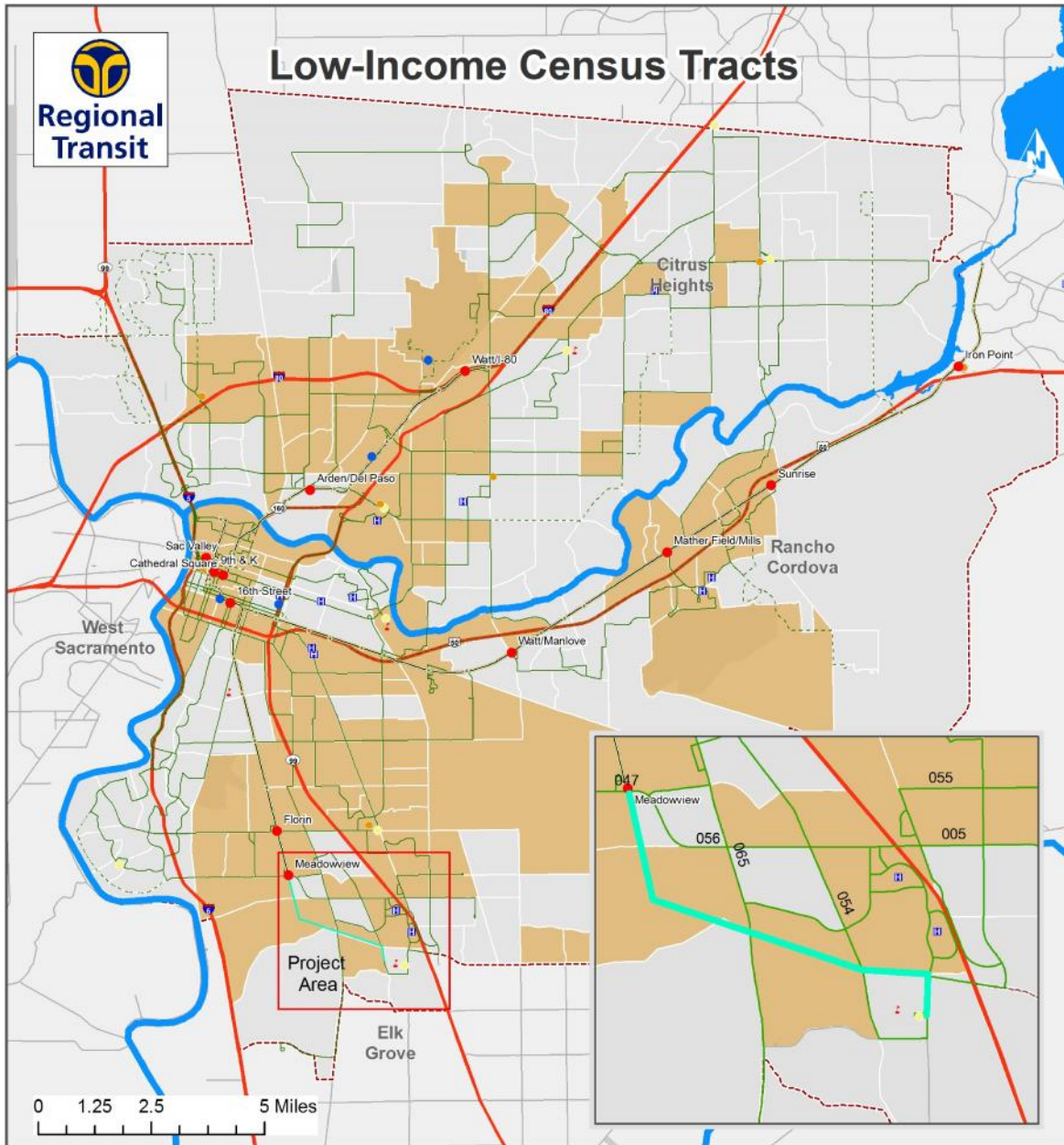
DRAFT LIGHT RAIL TIMETABLE													WEEKDAYS	Effective: 9/4/15
WATT/80 BOUND														
TRN #	CRC	FRANK	MDW	FLOR	CITY COL	16TH	ST ROSE	ALK FLT	ARDN	PLATF	MARC	WATT/80	TRN #	
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Service Area	Hospitals
Light Rail	College/University
Bus Routes	Major Shopping Centers
Peak-Only Bus Routes	
Light Rail Stations	
Transit Center	
RT Facility	
Proposed CC Stations	

Service Area = 437 sq mi*
Service Area Population = 1,138,076
Population Minority = 581,172
Shaded Census Tracts exceed 51.1% minority

Source: US Census Bureau, American Community Survey 2007-2011
*Service Area includes City of Citrus Heights at 14.23 sq mi



Service Area	Hospitals	<p>Service Area = 437 sq mi*</p> <p>Service Area Population = 1,138,076</p> <p>Population Low-Income = 184,720</p> <p>Shaded Census Tracts exceed 16.4% low-income**</p>
Light Rail	College/University	
Bus Routes	Major Shopping Centers	
Peak-Only Bus Routes		
Light Rail Stations		
Transit Center		
RT Facility		
Proposed CC Stations		

Source: US Census Bureau, American Community Survey 2007-2011
 *Service Area includes City of Citrus Heights at 14.23 sq mi
 **Percent low-income is computed using a total population of only 1,124,238 for which Low Income is actually determined.



Service and Fare Change Policies
Appendix E - Service Change Equity Analysis Template

Project Title/Description Blue Line to CRC Light Rail Extension
September 2015

CURRENT SYSTEM STATISTICS

RT Average Weekday Ridership: 94,522 Source: FY2013 NTD
Bus and Light Rail

Minority Ridership: 65,220 69.0 % (A1)

Low-Income Ridership: 50,097 53.0 % (B1)
Household income less than \$30,000

Data Source for Demographics: 2013 On-Board Survey
Ex: 2010 On-Board Survey

SERVICE CHANGE IMPACTS

Data Source for Demographics: 2013 On-Board Survey
Ex: 2010 On-Board Survey
(should match above)

Net Revenue Miles: All Riders: 180,551
Train Revenue Miles
Annualized

Minority: 146,246 81.1 % (A2)

Low-Income: 108,330 60.1 % (B2)

Disparate Impact: Yes No Is there an adverse disparity between A1 and A2 exceeding RT's 15 percent threshold of statistical significance? If yes, then the change may be implemented only if (1) a substantial legitimate justification has been prepared in written form and (2) there are no alternatives that would have a less disparate impact on minority riders but would still accomplish RT's legitimate program goals.

Disproportionate Burden: Yes No Is there an adverse disparity between B1 and B2 exceeding RT's 15 percent threshold of statistical significance? If yes, then RT must take steps to avoid, minimize, or mitigate impacts where practicable and must also describe alternatives available to low-income passengers affected.


Prepared by

6-24-14
Date

James A. Drake
Reviewed by

7/14/14
Date