REGIONAL TRANSIT ISSUE PAPER

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Agenda	Board Meeting	Open/Closed	Information/Action	Issue
Item No.	Date	Session	Item	Date
10	03/13/17	Open	Action	03/03/17

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Subject: Approving a Title VI Fare Equity Analysis

<u>ISSUE</u>

Whether or not to approve a Title VI fare equity analysis for multiple fares changes.

RECOMMENDED ACTION

Adopt Resolution No. 17-03-_____ Approving a Title VI Fare Equity Analysis.

FISCAL IMPACT

None.

DISCUSSION

Pursuant to RT's fare change policy and in accordance with Federal Title VI civil rights requirements, RT is required to conduct a Title VI fare equity analysis prior to implementing any fare change (with some exceptions, including promotional fare programs lasting up to six months). The purpose of a Title VI fare equity analysis is to identify and document any potential disparate impacts on minority populations or disproportionate burdens on low-income populations resulting from changes to RT's fare structure. Prior to a fare change proposal being implemented beyond the six-month pilot period: a draft Title VI fare equity analysis of the proposed changes must be made available for a 30-day public review period; members must of the public must be invited to comment; staff and the Board of Directors are required to take public comments into consideration; and the Board must approve the findings.

Over the course of 2016 and early 2017, RT implemented multiple fare changes on a pilot basis, including: (1) a mobile fare app; (2) a group fare for special events; and (3) a round trip fare for special events. In addition, RT is considering expanded eligibility for student discounts. In accordance with Title VI requirements, a draft Title VI fare equity analysis was published on RT's web site on January 27, 2017 for a 30-day public review. A total of twelve comments were received and have been included in Attachment 1 for the Board's consideration. The analysis found that there would be no potential disparate impacts nor any potential disproportionate burdens from implementing the fare changes.

Approval of the analysis would make the special event group fare and round trip fare permanent and would allow the RT Board to adopt the expanded rules for student eligibility. It would also cure RT's delay in performing a Title VI equity analysis for its mobile ticketing platform. Mobile ticketing was launched on January 3, 2016, as a six-month pilot. However, to maintain continuity for the launch of the Golden 1 Center and to avoid customer confusion, the program was extended. Staff recommends the Board approve the analysis.

Approved:

Presented:

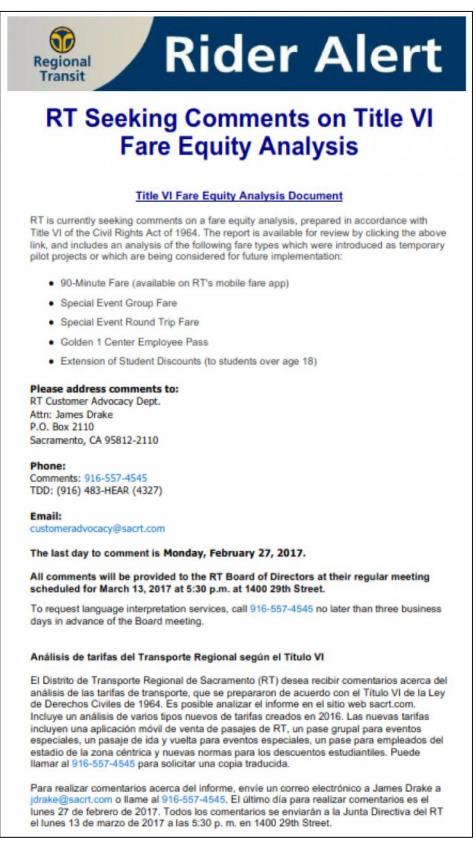
Principal Planner (Acting) J:Board Meeting Documents/2017/04 March 13, 2017/Title VI New Fares 2016 - IP.doc

Public Notice Examples and Customer Comments

RT Web Site



Rider Alert Email



Rider Alert Email

地區運輸 (Regional Transit) 第六章票價分析

薩克拉門托地區運輸局(RT)正在對一項根據《1964年民權法》第六章编寫的交通票價分析 進行徵求意見。您可以查陸 sacrt.com.查看分析報告,報告對 2016年新制定的幾種票價類型 進行了分析。新的票價涉及 RT 移動售票應用 app、特殊事項的團體通行、特殊事項的往返 票、市中心新建球館的員工通行以及學生折扣的新規定。您可以撥打 916-557-4545 請求獲得 譯本。

 苗將評價意見傳送至電子郵箱jdrake@sacrt.com,或撥打 916-557-4545 進行評價。評價就止 時間: 2017 年 2 月 27 日星期一。所有的評價意見將於 2017 年 3 月 13 日下午 5:30 提交 RT 董事會, 损交地點位於第 29 街 1400 號。

Kev Caij Tsheb Mus Los Hauv Cheeb Tsam Title VI Txheeb Xyuas Cov Nqi Tsheb

Nroog Sacramento Li Kev Caij Tsheb Mus Los Hauv Cheeb Tsam (RT) tab tom nrhiav cov lus taw qhia ntawm kev txheeb xyuas cov nqi tsheb mus los, npaj raws li Title VI ntawm Tsab Cai Pej Xeem Cov Cai xyoo 1964. Muaj cov ntawv teev num rau tshuaj xyuas ntawm sacr.com. Nws suav nrog cov ntaub ntawv txheeb xyuas ntawm ntau hom nqi tsheb tshiab uas tau tsim tawm xyoo 2016. Cov nqi tsheb tshiab no suav nrog RT cov app muag pib tsheb ntawm tes, hla ua pab pawg rau cov koom txoos tshwj xeeb, cov pib mus los rau cov koom txoos tshwj xeeb, cov neeg ua haujiwm hauv nroog, thiab cov cai tshiab txo nqi rau cov tub ntxhais kawm. Daim ntawv theej kev caij tsheb mus los muaj raws li thov tuaj uas yog hu rau 916-557-4545.

Txhawm rau muab cov lus taw qhia txog tsab ntawv teev num, xa email rau James Drake ntawm jdrake@sacrt.com lossis hu rau 916-557-4545. Hnub kawg ntawm kev muab lus taw qhia yog Hnub Monday, Lub Ob Hli 27 2017. Txhua cov lus taw qhia yuav raug muab xa rau RT Pab Pawg Thawj Coj hnub Monday, Lub Peb Hli 13, 2017 thaum 5:30 teev tsaus ntuj ntawm 1400 29th Street.

Анализ тарифов Regional Transit согласно разделу VI Закона о гражданских правах

Sacramento Regional Transit District (RT) предлагает прокомментировать анализ тарифов на проезд, подготовленный согласно разделу VI Закона о гражданских правах 1964 г. Отчет можно просмотреть на веб-сайте sacrt.com. В отчете представлен анализ нескольких новых видов тарифов, введенных в 2016 г. В частности, рассматривается мобильное приложение RT для покупки билетов, групповой проездной для специальных мероприятий, билет в оба конца для специальных мероприятий, преездной работника до стадиона в центре и новые правила льготного проезда для учащихся. Переведенный экземпляр анализа можно получить по запросу, позвонив по номеру 916-557-4545.

Чтобы прокомментировать отчет, отправьте письмо на имя Джеймса Дрейка (James Drake) по адресу jdrake@sacrt.comили позвоните по номеру 916-557-4545. Комментарии можно оставлять до 27 февраля 2017 г. (понедельник) включительно. Все комментарии будут переданы совету директоров RT 13 марта 2017 г. в 17:30 по адресу 1400 29th Street.

Phân tích Vé Tựa đề VI Dịch vụ Vận tải Khu vực

Sở Vận tải Khu vực Sacramento (RT) đang tìm kiếm các nhận xét để chuẩn bị phân tích vé dịch vụ vận tải theo Tựa đề VI của Đạo luật Dân quyền 1964. Bảo cáo có sẵn cho quý vị có thể xem lại trên sacrt.com. Bảo cáo bao gồm phân tích một vài loại vé mới được xác định vào năm 2016. Các loại vé mới bao gồm ứng dụng mua vé di động, vé nhóm cho sự kiện đặc biệt, vé khứ hồi cho sự kiện đặc biệt, vé nhân viên tới sân vận động trung tâm và quy tắc giảm giá vé sinh viên mới. Quý vị có thể yêu cầu bản dịch về bảo cáo phân tích vé bằng cách gọi điện cho 916-557-4545.

Để nhận xét về báo cáo, hãy gửi email cho James Drake tại địa chỉ email jdrake@sacrt.com hoặc gọi điện thoại cho số 916-557-4545. Ngày cuối cùng để nhận xét là thứ Hai, ngày 27 tháng 2 năm 2017. Tất cả nhận xét sẽ được gửi cho Ban Giám đốc RT vào thứ Hai, ngày 13 tháng 3 năm 2017 lúc 17:30 tại địa chỉ 1400 29th Street.

Sacramento Regional Transit District, 1400 29th Street, Sacramento, CA 95816

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Brochures Page 1 of 2



RT Seeking Comments on Title VI Fare Equity Analysis

RT is currently seeking comments on a fare equity analysis, prepared in accordance with Title VI of the Civil Rights Act of 1964. The report is available for review by clicking the above link, and includes an analysis of the following fare types which were introduced as temporary pilot projects or which are being considered for future implementation:

- 90-Minute Fare (available on RT's mobile fare app)
- Special Event Group Fare
- Special Event Round Trip Fare
- Golden 1 Center Employee Pass
- Extension of Student Discounts (to students over age 18)

Please address comments to:

RT Customer Advocacy Dept. Attn: James Drake • P.O. Box 2110 Sacramento, CA 95812-2110

Phone:

Comments: (916) 557-4545 TDD: (916) 483-HEAR (4327)

Email:

customeradvocacy@sacrt.com

The last day to comment is Monday, February 27, 2017.

All comments will be provided to the RT Board of Directors at their regular meeting scheduled for March 13, 2017 at 5:30 p.m. at 1400 29th St.

(continued)

To request language interpretation services, call 916-557-4545 no later than three business days in advance of the Board meeting.

Análisis de tarifas del Transporte Regional según el Título VI

El Distrito de Transporte Regional de Sacramento (RT) desea recibir comentarios acerca del análisis de las tarifas de transporte, que se prepararon de acuerdo con el Titulo VI de la Ley de Derechos Civiles de 1964. Es posible analizar el informe en el sitlo web sacrt.com. Incluye un análisis de varios tipos nuevos de tarifas creados en 2016. Las nuevas tarifas incluyen una aplicación móvil de venta de pasajes de RT, un pase grupal para eventos especiales, un pasaje de ida y vuelta para eventos especiales, un pase para empleados del estadio de la zona céntrica y nuevas normas para los descuentos estudiantiles. Puede llamar al 916-557-4545 para solicitar una copia traducida.

Para realizar comentarios acerca del informe, envíe un correo electrónico a James Drake a jdrake@sacrt.com o llame al 916-557-4545. El último día para realizar comentarios es el lunes 27 de febrero de 2017. Todos los comentarios se enviarán a la Junta Directiva del RT el lunes 13 de marzo de 2017 a las 5:30 p.m. en 1400 29th Street.

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Brochures Page 2 of 2

проездной работника до стадиона в центре и новые правила льготного проезда для учащихся. Переведенный экземпляр анализа можно получить по запросу, позвонив по номеру 916-557-4545.

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地區運輸(Regional Transit)第六章票價分析

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請將評價意見傳送至電子郵箱 jdrake@sacrt.com ,或撥打 916-557-4545 進行評價。評價截止時 間:2017 年 2 月 27 日星期一,所有的評價意見 將於 2017 年 3 月 13 日下午 5:30 提交 RT 董 事會,提交地點位於第 29 街 1400 號。

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Txhawm rau muab cov lus taw qhia txog tsab ntawv taev num, xa email rau James Drake ntawm jdrake@sacrt.com lossis hu rau 916-557-4545. Hnub kawg ntawm kev muab lus taw qhia yog Hnub Monday, Lub Ob Hli 27 2017. Txhua cov lus taw qhia yuav raug muab xa rau RT Pab Pawg Thawj Coj hnub Monday, Lub Peb Hli 13, 2017 thaum 5:30 teev tsaus ntuj ntawm 1400 29th Street.

TITLE VI FARE	EQUITY	ANALYSIS
PUBLIC	COMME	NTS

Feedback ID	Date Received	First Name	Last Name	Incident/Details
#37731	2/9/17	Geneva	Kraus	I support the future implementation of all the temporary pilot projects listed as part of the regular SacRt fare offerings. Any way to expand ridership is a good thing in my opinion, especially when it encourages visitors to use mass transit, plus supports local employees and students. I would point out (althought I am sure you all have thought of this!) that visitors need to be made aware of mass transit options when they are planning their trip; for instance, some sort of notification on the Golden 1 Center website, or a similar venue. It is encouraging to see SacRT partnering with downtown business to provide transportation to employees. I would love to see similar outreach to other smaller downtown businesses as a way to reduce vehicle congestion during the work week.
#37732	2/9/17	Julie	Bauer	I do not agree that Golden One Center attendees should receive discount fares, or special treatment/ freebies / entertainment.
#37734	2/9/17	Carolyn	Ferrero	I would like to comment on the student discounts for people over 18, a lot of young people are only working part-time while attending college and have a limited income by that. If a student - of any age - could show that they are enrolled in school (high school or college), a discount should be given to them.

TITLE VI FARE EQUITY ANALYSIS PUBLIC COMMENTS

Feedback	Date	First		In eident/Dataila
ID	Received	Name	Last Name	Incident/Details
#38102	2/24/17	Barbara	Stanton	Barbara Stanton of Ridership for the Masses - We do have a comment regarding the Title VI Fare Equity Analysis. The bottom line is, The Mobile Fare App does not favor low income people and puts them at a disadvantage.
#38122	2/27/17	Dan	Allison	 90-Minute Fare (available on RT's mobile fare app) Support 90-minute fare, but it needs to work the same on ConnectCard as mobile app, which it does not. The separation of bus and light rail in ConnectCard discriminates against people who transfer between light rail and bus, offering a service to users of the mobile app, who have smart phones, but not to users of the ConnectCard. Special Event Group Fare This fare was designed for higher income riders attending Golden 1 events. Unless it is extended to families using any part of the system at any time, it discriminates against lower income people by offering discounts to higher income people. Family fares should be offered system-wide. Special Event Round Trip Fare Golden 1 Center Employee Pass Extension of Student Discounts (to students over age 18) Support.

TITLE VI FARE EQUITY ANALYSIS PUBLIC COMMENTS

Feedback	Date	First	Last Name	Incident/Details
ID	Received	Name		
#38123	2/27/17	Elizabeth	Kazemi-Asl	To Whom it May Concern, With regard to the 90-minute fair payable by my phone: <u>I love it!</u> <u>I would not be able to get around without</u> <u>it!</u> As a disabled senior living in San Francisco, until about a year ago, I had grown accustomed to riding for FREE. When I moved to Sacramento I'm afraid I was a bit shocked by the cost of getting around. It's one of the more expensive aspects of living in this city. Operators here do not give transfers as they do in so many other cities and buying a daily pass every time I leave my home would be cost prohibitive. I <u>enthusiastically</u> urge you to continue this program! It gives me my <u>mobility!</u> Some of your operators aren't quite comfortable with the system yet. I think it would be a good idea to do a few more reviews with them to make sure everyone is at ease using it. Certain operators insist on prolonged examination of my phone, as if there were something suspicious going on. They don't seem to realize that when the ticket <u>expires</u> it just disappears. The website seems to be a tad slow, and because my phone is also slow, it sometimes takes over a minute to load the ticket. I'm hoping this will change over time. Aside from that, I wouldn't change a thing! I'm sure that most of your riders are too distracted by everyday life to take the time to write. Based on my conversations with other riders, regarding the e-ticket, many have expressed curiosity, and several of the people I see often, have switch from cash to buying tickets on their on their phones. After all, many of us have difficulty coming up with exact change, but, we almost always have our phones!
Mobility Advisory Council	3/2/17	Pam	Flohr	Will new arena fares be permanent?
Mobility Advisory Council	3/2/17	Gene	Lozano	Can 90 minute fare be for all fare types? RT needs transfers brought back.

TITLE VI FARE EQUITY ANALYSIS PUBLIC COMMENTS

Feedback ID	Date Received	First Name	Last Name	Incident/Details
Mobility Advisory Council	3/2/17	Helen	O'Connell	90 minute fare should be universal, not just for smart phone. Fare evasion is surprisingly high on RT. Analysis should be done differently to better assess equity.
Mobility Advisory Council	3/2/17	Patti	Johnson	If people are total use the iphone and android, sometimes it acts up as they rely on siri and the other phone assistant. It makes it difficult if a person is total and sometimes siri doesn't come up on iphone and the technology goes blank in certain areas and that would be a disadvantage for people who are total. Availability of the app is certainly an issue.
Mobility Advisory Council	3/2/17	Alan	Ruzich	Can fare vending machines back up a mobile phone fare that malfunctions?
Mobility Advisory Council	3/2/17	Jeffery	Tardaguila	Where did demographics come from? What is dollar value of impacts?

RESOLUTION NO. 17-03-____

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

March 13, 2017

APPROVING A TITLE VI FARE EQUITY ANALYSIS

WHEREAS, Federal Title VI civil rights regulations and RT policy require a fare equity analysis be prepared, reviewed, and approved by the RT Board prior to implementation of any fare changes; and

WHEREAS, on January 27, 2017, a draft Title VI fare change equity analysis was published on RT's web site for a 30-day public comment period; and

WHEREAS, the Board of Directors has received and taken into consideration all public comments; and

WHEREAS, the draft Title VI civil rights analysis found that there would be no potential disparate impacts on minority populations and that there would be no potential disproportionate burdens on low-income populations from implementing the fare changes that were analyzed.

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

THAT, the Board has reviewed, is aware of, and approves the Title VI fare change equity analysis (Exhibit A); and

THAT, the Board finds that there would be no potential disparate impacts on minority populations from implementing the fare change; and

THAT, the Board finds that there would be no potential disproportionate burdens on low-income populations from implementing the fare changes: (1) 90-minute mobile fare; (2) Special Event Group fare; (3) Round trip fare; and (4) expanded eligibility for student discounts.

ANDREW J. MORIN, Chair

ATTEST:

HENRY LI, Secretary

Exhibit A



Title VI Fare Equity Analysis

March 13, 2017

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1. Purpose of Analysis

Pursuant to RT's fare change policy and in accordance with Federal Title VI civil rights requirements, the purpose of this analysis is to identify and document any potential disparate impacts on minority populations or disproportionate burdens on low-income populations resulting from changes to RT's fare structure.

2. Project Description

This analysis covers multiple fare changes:

- <u>90-Minute Mobile Fare</u> On January 3, 2016, RT introduced a 90-minute ticket available only on RT's mobile ticketing app. The 90-minute ticket is priced the same as RT's traditional single ride fare (i.e., \$2.75 for the general public and \$1.35 for discount-eligible riders); however, it entitles the user to unlimited bus and light rail rides during the 90-minute activation period.¹
- Special Event Group Fare On August 22, 2016, RT authorized, on a temporary six-month basis, a new Special Event Group Fare that allows groups of up to four persons to make unlimited rides for one day when travelling together on the bus and light rail system. The group fare is valid only on days of major events at the Golden 1 Center and only with valid Golden 1 Center tickets to that event. The pass is priced at \$14.00.
- 3. <u>Round-Trip Fare</u> On October 24, 2016, RT introduced, on a temporary sixmonth trial basis, a round trip fare. The round trip fare is priced at \$5.50, which is equal to two single fares. The round trip fare is available only on light rail and only from RT's newer Parkeon fare vending machines. The round trip fare allows same-day cash users to pre-purchase a return fare, to reduce customer wait time at ticket machines after major Golden 1 Center events. The round trip fare is valid only with a valid Golden 1 Center event ticket. On November 14, 2016, the fare structure was amended to allow a \$2.70 version of the round trip fare for customers eligible for RT discount fares (i.e., students, seniors, and disabled).
- 4. <u>Expanded Eligibility for Student Discounts</u> On January 9, 2017, staff briefed the RT Board on a potential change to eligibility rules for student discounts. Currently, to qualify for a student discount, a rider must be age 18 or younger and enrolled in a K-12 school. Under the potential changes, RT would extend the student discount to students of any age enrolled in a K-12 school.

¹ RT's traditional light rail single ride tickets actually allow unlimited boardings on light rail during a 90minute period; however, no such privilege existed for bus riders prior to the mobile fare app.



<u>Golden 1 Employee Fare</u> – On September 26, 2016, the Board authorized RT to enter into a one-year agreement, to expire on September 30, 2017, providing for the acceptance by RT of Golden 1 Center employee badges, and those of other nearby downtown employers, as valid bus and light rail fare, on select routes to/from the Golden 1 Center, on the day of major events at the Golden 1 Center in exchange for a \$500,000 payment from the City of Sacramento to RT. This program has been in effect on a pilot basis since that time; however, the contract has not been executed. In January 2017, RT and City staff began negotiating changes in program terms. When the new program terms are finalized, RT will perform a Title VI analysis on the program, which will need to be approved prior to executing the contract and making the changes permanent.

3. Title VI Requirements

RT is required to conduct a Title VI fare equity analysis prior to implementing any fare change, with some exceptions, including promotional free-ride days and promotional fare programs lasting up to six months.² A fare change proposal and a draft Title VI fare equity analysis of the proposed changes (this document) must be made available for a 30-day public review period, members must of the public must be invited to comment, and staff and the Board of Directors are required to take public comments into consideration. Prior to the changes being implemented, the Board must approve the findings of a final Title VI fare equity analysis. In accordance with these requirements, this document will be published on RT's web site and RT will provide notice to customers of the opportunity to provide comments.

4. Data and Methodology

<u>On-Board Survey</u> - In April 2013, an on-board passenger survey was conducted on RT buses and light rail trains. Passengers on randomly selected trips on all RT routes completed a self-administered questionnaire. In accordance with FTA guidance, when possible, equity analyses are based on demographic estimates of actual riders. These on-board survey responses therefore form the basis of the analysis below.

<u>Fare Survey</u> - On an annual basis, RT conducts a passenger fare survey. This survey provides ridership figures for each fare type, including multi-ride passes, and is used to compute an average fare per boarding for each fare type.

<u>Special Surveys</u> – In the case of new fare types, RT may use special surveys or research to estimate minority and/or low-income utilization rates.

² See FTA Circular 4702.1B, Chapter IV, Section 7 and RT Fare Change Policies (Resolution No. 15-11-0129).



<u>Analysis</u> - Using the demographic data from the 2013 on-board survey, RT can estimate the percent minority and the percent low-income utilization of each fare type. This data is combined with the average fare per boarding for each fare type from the annual fare survey. RT can then estimate overall average fare splits for minority versus non-minority and low-income versus non-low-income riders.

<u>Findings</u> - Potential disparate impacts (and disproportionate burdens) from fare changes are determined by comparing the rate of change of the average fare for all minority riders to that for non-minority riders. RT's Title VI goal is for the percent increase in average fare for minority populations to be less than or equal to that for non-minority populations in the case of a net fare increase and equal or greater to that for non-minority populations in the case of a net fare decrease. A disparate impact may exist if there is a statistically significant deficiency from this goal. RT defines a deficiency as statistically significant if the rates of change differ by more than 20 percent.

<u>Minority Definition</u> - 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.

<u>Low-Income Definition</u> - 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 used HHS poverty guidelines from 2013.³ Survey participants were asked their household size and their household income from a list of ranges. For the purposes of this survey, the participant's income is assumed to be the midpoint of the range selected.⁴

³ Although newer HHS statistics are available, the 2013 statistics were the newest statistics available at the time that the statistical analysis was performed on the 2013 on-board survey data. RT's baseline demographic statistical data is typically refreshed during the process of preparing the triennial Title VI update report, which was last updated in 2014 and which will be updated and submitted to FTA in 2017.

⁴ 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.



Figure 1 Baseline Statistics Annual Ridership and Fare Revenue

	Face			
Fare Category	Value	Revenue	Boardings	Avg Fare
Single Cash - Bus	\$2.75	\$2,271,919	828,060	\$2.74
Single Ticket - Bus	\$2.75	\$245,535	89,492	\$2.74
Single Cash - Rail	\$2.75	\$1,407,823	919,650	\$1.53
Single Ticket - Rail	\$2.75	\$1,207,546	788,820	\$1.53
Disc Single Cash - Bus	\$1.35	\$704,823	505,729	\$1.39
Disc Single Tkt - Bus	\$1.35	\$44,278	31,771	\$1.39
Disc Single Cash - Rail	\$1.35	\$214,671	209,137	\$1.03
Disc Single Tkt - Rail	\$1.35	\$191,130	186,202	\$1.03
Daily Pass	\$7.00	\$4,673,933	3,206,186	\$1.46
Disc Daily Pass	\$3.50	\$2,328,169	2,052,586	\$1.13
Monthly Pass	\$110.00	\$9,216,730	3,405,157	\$2.71
Semi-Monthly Pass	\$60.00	\$405,689	241,984	\$1.68
Student Semi-Monthly	\$27.50	\$826,801	627,009	\$1.32
Senr/Disb Monthly/Semi	\$55.00	\$2,049,549	2,594,541	\$0.79
Super Senior Monthly Pass	\$42.00	\$25,737	34,474	\$0.75
Los Rios		\$2,154,066	3,553,518	\$0.61
CSUS		\$1,136,171	875,461	\$1.30
DHA		\$2,060,848	1,348,485	\$1.53
Fare Evader		\$0	1,263,163	\$0.00
Child		\$0	652,878	\$0.00
Lifetime		\$0	249,911	\$0.00
Other Boardings		\$0	335,786	\$0.00
		\$31,165,419	24,000,000	\$1.30

Breakdowns are based on estimates of each fare category made for RT's July 2016 fare change, projected to reflect final budgeted totals for ridership and fare revenue for Fiscal Year 2017. Fare revenue figures for each fare type include an allocation of approximately \$1.2 million net payment out to other transit agencies pursuant to RT's transfer agreements. Ridership splits are based on RT's FY 2015 Fare Survey, with adjustments to account for expected elasticity-based changes due to RT's July 2016 fare increase.



5. Baseline Data

Figures 3 and 4 provide breakdowns of existing fare utilization by fare type and minority/low-income status. As shown in Figures 3 and 4, minority and low-income riders currently pay a lower fare to ride the RT system, on average, than the general population.

Figure 2 Baseline Minority Ridership Statistics

	Fare Rev	Fare Revenue		Boardings		
	Amount	%	Amount	%	Fare	
Minority	\$20,433,104	65.6%	16,142,675	67.3%	\$1.27	
Non-Minority	\$10,732,315	34.4%	7,857,325	32.7%	\$1.37	
All Riders	\$31,165,419	100.0%	24,000,000	100.0%	\$1.30	

Minority riders make up an estimated 67.3 percent of RT fixed-route ridership and pay an estimated 65.6 percent of fares, paying an estimated average fare of \$1.27 per boarding. Non-minority riders make up an estimated 32.7 percent of ridership and pay an estimated 34.4 percent of fares, paying an average of \$1.37 per boarding. See Appendix A for details.

Figure 3 Baseline Low-Income Ridership Statistics

	Fare Rev	enue	Boardin	gs	Avg.
	Amount	%	Amount	%	Fare
Low-Income	\$13,758,439	44.1%	11,481,763	47.8%	\$1.20
Non-Low-Income	\$17,406,980	55.9%	12,518,237	52.2%	\$1.39
All Riders	\$31,165,419	100.0%	24,000,000	100.0%	\$1.30

Low-income riders make up an estimated 47.8 percent of RT fixed-route ridership and pay an estimated 44.1 percent of fares, paying an estimated average fare of \$1.20 per boarding. Non-low-income riders make up an estimated 52.2 percent of ridership and pay an estimated 55.9 percent of fares, paying an average of \$1.39 per boarding. See Appendix A for details.



6. Demographics of New Fares

All of the potential new fare types have below-average minority and low-income utilization rates compared to the RT system (which averages 67.3 and 47.8 percent, respectively), except for the extension of student discounts, which are heavily used by minority and low-income customers.

	% Minority	% Low- Income	Minority/ Low-Income Fare Type?
Special Event Group Fare	41.4%	9.1%	No
Mobile Single (90m)	67.2%	43.7%	No
Mobile Disc Single (90m)	67.2%	43.7%	No
Round Trip \$5.50	41.4%	9.1%	No
Disc Round Trip \$2.70	41.4%	9.1%	No
Extended Student Discounts	87.0%	63.8%	Both
New Fares (total)	65.4%	41.0%	No
RT System (baseline)	67.3%	47.8%	n/a

Figure 4 Minority and Low-Income Use of New Fare Types

Minority and low-income splits for the special event group fare and the round trip tickets are assumed to equal overall splits for Golden 1/Kings game attendees and are based on a survey of Kings game attendees conducted December 20, 2016.

Mobile fare demographics are based on passenger surveys conducted 2015-16.

G1 employee pass demographics are based on surveys of pass holders conducted November 10, 2016.

See Appendix B for details.

Utilization rates for the new fares combined are expected to be 65.4 percent minority and 41.0 percent low-income.

7. Sales and Ridership Forecasts

Based on existing data, all of the new fare types combined are expected to total \$577,662 in sales and 353,096 boarding passengers per year. The most heavily-used type is expected to be the mobile single fare at \$433,901 in sales per year. The remaining fare types are each expected to total less than \$50,000 in sales per year.

Fare Change	Minority/ Low-Income Fare Type?	Fare Revenue	Boardings	Avg Fare
Special Event Group Fare	No	\$25,000	11,200	\$2.23
Mobile Single (90m)	No	\$433,901	264,758	\$1.64
Mobile Disc Single (90m)	No	\$44,237	54,985	\$0.80
Round Trip \$5.50	No	\$46,693	16,979	\$2.75
Disc Round Trip \$2.70	No	\$11,166	8,273	\$1.35
Extended Student Discounts	Both	\$16,665	13,422	\$1.24
New Fares (total)	No	\$577,662	353,096	\$1.56
RT System (baseline)	n/a	\$31,165,419	24,000,000	\$1.30

Figure 5 Sales and Ridership Forecasts for New Fare Types

The average fare per boarding passenger for most of the new fare type exceeds RT's existing systemwide average of \$1.30; however, all of the new fare types still represent discounts compared to what the passenger *would have paid* before the new fare type.

8. Net Sales and Ridership Impacts

All the new fares are relatively minor discount programs. Most users of these new fares would have ridden RT even if the new fare had not been created, but would have paid a higher fare. None of the new fare types are expected to affect sales by more than \$15,000 or ridership by more than 11,000 boardings, net of what the customers would have paid before introduction of the new fare.

Figure 6 Expected Change in Sales From Old to New Fare Types

	Using	Using		
New Fare Type	Old Fares	New Fare	Change	% Change
Special Event Group Fare	\$25,760	\$25,000	(\$760)	-3.0%
Mobile Single (90m)	\$448,676	\$433,901	(\$14,776)	-3.3%
Mobile Disc Single (90m)	\$56,824	\$44,237	(\$12,587)	-22.2%
Round Trip \$5.50	\$47,831	\$46,693	(\$1,138)	-2.4%
Disc Round Trip \$2.70	\$11,463	\$11,166	(\$296)	-2.6%
Extended Student Discounts	\$17,190	\$16,665	(\$525)	-3.1%
Total	\$607,745	\$577,662	-\$30,083	-4.9%

Figure 7 Expected Change in Boardings From Old to New Fare Types

	Using	Using		
New Fare Type	Old Fares	New Fare	Change	% Change
Special Event Group Fare	11,056	11,200	144	1.3%
Mobile Single (90m)	254,704	264,758	10,054	3.9%
Mobile Disc Single (90m)	49,092	54,985	5,893	12.0%
Round Trip \$5.50	16,815	16,979	165	1.0%
Disc Round Trip \$2.70	8,187	8,273	87	1.1%
Extended Student Discounts	13,243	13,422	179	1.4%
Total	353,096	369,618	16,522	4.7%



9. Impact on Average Fare

Each of the new fare types reduces the cost to ride for its users, compared to what they paid before the new type existed. For example, users of the 90-Minute Mobile Single fare are expected to have paid \$1.76 before the fare was created, using a combination of single bus fares, single rail fares (which are useable for multiple light rail boardings) and daily passes. Using the new mobile fare, they are expected to pay slightly less per boarding at \$1.64.

New Fare Type	Using Old Fares	Using New Fare	Change	% Change	Minority/ Low-Income Type?
Special Event Group Fare	\$2.31	\$2.23	-\$0.08	-3%	No
Mobile Single (90m)	\$1.76	\$1.64	-\$0.12	-7%	No
Mobile Disc Single (90m)	\$1.16	\$0.80	-\$0.35	-30%	No
Round Trip \$5.50	\$2.84	\$2.75	-\$0.09	-3%	No
Disc Round Trip \$2.70	\$1.40	\$1.35	-\$0.05	-4%	No
Extended Student Discounts	\$1.30	\$1.24	-\$0.06	-4%	Both

Figure 8 Expected Change in Average Fare For Users of New Fare Types

All the new fares confer benefits upon their users in the form of a lower cost to ride. The new student discounts are the only new fare type that has above-average utilization by minority and low-income populations, so it is the only change that is expected to be positive from a Title VI standpoint.

Whether or not these changes create a potential disparate impact/disproportionate burden depends on the impact to RT's *systemwide* average fare splits.

10. Systemwide Average Fare Impacts

The total effect of the potential fare changes has negligible impact on RT's systemwide average fare of \$1.30. Nor does it significantly alter minority and non-minority splits. The average fare per boarding for minority populations will decrease from \$1.27 to \$1.26. The average fare per boarding for non-minority populations will decrease from \$1.37 to \$1.36.

Figure 9 Systemwide Average Fare Minority/Non-Minority Splits Before and After Fare Changes

	Fare R	evenue	Board	Avg. Fare		
	Before	After	Before	After	Before	After
Minority	\$20,433,104	\$20,413,359	16,142,675	16,153,707	\$1.27	\$1.26
Non-Minority	\$10,732,315	\$10,721,978	7,857,325	7,862,816	\$1.37	\$1.36
All Riders	\$31,165,419	\$31,135,336	24,000,000	24,016,522	\$1.30	\$1.30

The effects of the potential fare changes combined are expected to be negligible on low-income and non-low-income populations. Low-income populations will still continue to pay an average of \$1.20 per boarding. Non-low-income populations will still continue to pay an average of \$1.39 per boarding.

Figure 10 Systemwide Average Fare Low-Income/Non-Low-Income Splits Before and After Fare Changes

	Fare R	evenue	Board	Avg. Fare		
	Before	After	Before	After	Before	After
Low-Income	\$13,758,439	\$13,745,960	11,481,763	11,488,874	\$1.20	\$1.20
Non-LI	\$17,406,980	\$17,389,376	12,518,237	12,527,648	\$1.39	\$1.39
All Riders	\$31,165,419	\$31,135,336	24,000,000	24,016,522	\$1.30	\$1.30



11. Comparison of Impacts

The proposed changes would reduce the average fare by approximately \$0.002 for minority, non-minority, low-income, non-low-income, and RT's overall ridership. No rider category is expected to have its average fare change by more than 0.18 percent.⁵

	Existing	Proposed	Change	% Change
All Riders	\$1.299	\$1.296	-\$0.002	-0.17%
Minority Riders	\$1.266	\$1.264	-\$0.002	-0.16%
Non-Minority Riders	\$1.366	\$1.364	-\$0.002	-0.17%
Low-Income Riders	\$1.198	\$1.196	-\$0.002	-0.15%
Non-Low-Income Riders	\$1.391	\$1.388	-\$0.002	-0.18%

Figure 11 Projected Change in Average Fare Minority and Low-Income Splits

Minority and low-income riders currently pay lower fares, on average, than the general population, and would continue to do so under the proposed changes. The rate of decrease, which is no more than 0.18 percent for any group, is slightly greater for non-minority and non-low-income populations.

⁵ For the sake of comparison, RT's July 1, 2016 fare increase was projected to increase the average fare for minority and low-income populations by approximately 14 percent.



12. Findings

Potential disparate impacts to minority populations are determined by comparing the *rate of change* of the average fare for all minority riders to that for non-minority riders. An adverse difference exceeding 20 percent is considered significant. The same analysis is conducted for low-income populations to determine potential disproportionate burdens.

Figure 12 Determination of Potential Disparate Impacts and/or Disproportionate Burdens

For All New Fares Combined

 a. Percent decrease in non-minority avg fare b. Threshold of statistical significance (80% * a) c. Percent decrease in minority avg fare d. Do fares decrease more for non-minority populations? (a < c) e. Is there evidence of a potential disparate impact (c > b) 	-0.17% -0.13% -0.16% Yes No
 f. Percent decrease in non-low-income avg fare g. Threshold of statistical significance (80% * f) h. Percent decrease in low-income avg fare i. Do fares decrease more for non-low-income populations? (f < h) j. Is there evidence of a potential disproportionate burden? (h > g) 	-0.18% -0.14% -0.15% Yes No

Per RT policy and FTA guidance, the impact of multiple fare changes are considered in aggregate to determine their combined effect.

All the new fares combined are expected to reduce the average fare per boarding slightly more for non-minority than for minority populations; however, the difference is not statistically significant. Therefore, this analysis finds *that there are no potential disparate impacts on minority populations as a result of the proposed fare changes.*

All the new fares combined are expected to reduce the average fare per boarding slightly more for non-low-income than for low-income populations; however, the difference is not statistically significant. Therefore, this analysis finds *that there are no potential disproportionate burdens on low-income populations as a result of the proposed fare changes.*

Appendices



Title VI Fare Equity Analysis March 13, 2017

Appendix A Demographic Details

Figure 13 Baseline Minority Ridership Details

	Face					Minority Riders	6	Ν	Ion-Minority Ride	ers
Fare Category	Value	Revenue	Boardings	Avg Fare	% Split	Revenue	Boardings	% Split	Revenue	Boardings
1 Single Cash - Bus	\$2.75	\$2,271,919	828,060	\$2.74	66.0%	\$1,499,467	546,519	34.0%	\$772,453	281,540
2 Single Ticket - Bus	\$2.75	\$245,535	89,492	\$2.74	57.0%	\$139,955	51,010	43.0%	\$105,580	38,481
3 Single Cash - Rail	\$2.75	\$1,407,823	919,650	\$1.53	64.0%	\$901,007	588,576	36.0%	\$506,816	331,074
4 Single Ticket - Rail	\$2.75	\$1,207,546	788,820	\$1.53	48.7%	\$588,075	384,156	51.3%	\$619,471	404,665
5 Disc Single Cash - Bus	\$1.35	\$704,823	505,729	\$1.39	72.3%	\$509,587	365,642	27.7%	\$195,236	140,087
6 Disc Single Tkt - Bus	\$1.35	\$44,278	31,771	\$1.39	74.5%	\$32,987	23,669	25.5%	\$11,291	8,102
7 Disc Single Cash - Rail	\$1.35	\$214,671	209,137	\$1.03	71.4%	\$153,275	149,324	28.6%	\$61,396	59,813
8 Disc Single Tkt - Rail	\$1.35	\$191,130	186,202	\$1.03	45.5%	\$86,964	84,722	54.5%	\$104,166	101,480
9 Daily Pass	\$7.00	\$4,673,933	3,206,186	\$1.46	75.5%	\$3,528,819	2,420,671	24.5%	\$1,145,114	785,516
10 Disc Daily Pass	\$3.50	\$2,328,169	2,052,586	\$1.13	75.2%	\$1,750,783	1,543,544	24.8%	\$577,386	509,041
11 Monthly Pass	\$110.00	\$9,216,730	3,405,157	\$2.71	58.5%	\$5,391,787	1,992,017	41.5%	\$3,824,943	1,413,140
12 Semi-Monthly Pass	\$60.00	\$405,689	241,984	\$1.68	72.7%	\$294,936	175,922	27.3%	\$110,753	66,062
13 Student Semi-Monthly	\$27.50	\$826,801	627,009	\$1.32	87.0%	\$719,317	545,498	13.0%	\$107,484	81,511
14 Senr/Disb Monthly/Semi	\$55.00	\$2,049,549	2,594,541	\$0.79	46.0%	\$942,793	1,193,489	54.0%	\$1,106,757	1,401,052
15 Super Senior Monthly Pass	\$42.00	\$25,737	34,474	\$0.75	46.0%	\$11,839	15,858	54.0%	\$13,898	18,616
16 Los Rios		\$2,154,066	3,553,518	\$0.61	77.0%	\$1,658,631	2,736,209	23.0%	\$495,435	817,309
17 CSUS		\$1,136,171	875,461	\$1.30	74.3%	\$844,175	650,467	25.7%	\$291,996	224,993
18 DHA		\$2,060,848	1,348,485	\$1.53	66.9%	\$1,378,707	902,137	33.1%	\$682,141	446,349
19 Fare Evader		\$0	1,263,163	\$0.00	76.8%	\$0	970,109	23.2%	\$0	293,054
20 Child		\$0	652,878	\$0.00	69.0%	\$0	450,486	31.0%	\$0	202,392
21 Lifetime		\$0	249,911	\$0.00	48.4%	\$0	120,957	51.6%	\$0	128,954
22 Other Boardings		\$0	335,786	\$0.00	69.0%	\$0	231,692	31.0%	\$0	104,094
		\$31,165,419	24,000,000	\$1.30		\$20,433,104	16,142,675		\$10,732,315	7,857,325

Minority/non-minority splits are based on RT's 2013 On-Board Survey. Student fare types tend to have high minority utilization rates (e.g., 87 percent of student semi-monthly pass boardings are made by minority populations). Seniors and disabled fare types tend to have low minority utilization rates (e.g., 46 percent of boardings using a senior/disabled sticker are made by minority populations). Minority utilization of the Super Senior pass is assumed to be the same as for Senior/Disabled Monthly/Semi stickers. Child and Other categories are assumed to match the systemwide average.



Title VI Fare Equity Analysis March 13, 2017

> Appendix A Demographic Details

Figure 14 Baseline Low-Income Ridership Details

	Face				1	Low-Income Rid	ers	No	n-Low-Income R	liders
Fare Category	Value	Revenue	Boardings	Avg Fare	% Split	Revenue	Boardings	% Split	Revenue	Boardings
1 Single Cash - Bus	\$2.75	\$2,271,919	828,060	\$2.74	46.8%	\$1,063,857	387,750	53.2%	\$1,208,063	440,310
2 Single Ticket - Bus	\$2.75	\$245,535	89,492	\$2.74	7.2%	\$17,792	6,485	92.8%	\$227,743	83,007
3 Single Cash - Rail	\$2.75	\$1,407,823	919,650	\$1.53	43.3%	\$609,234	397,977	56.7%	\$798,590	521,673
4 Single Ticket - Rail	\$2.75	\$1,207,546	788,820	\$1.53	5.5%	\$66,167	43,223	94.5%	\$1,141,379	745,597
5 Disc Single Cash - Bus	\$1.35	\$704,823	505,729	\$1.39	52.8%	\$372,359	267,178	47.2%	\$332,464	238,551
6 Disc Single Tkt - Bus	\$1.35	\$44,278	31,771	\$1.39	40.0%	\$17,711	12,708	60.0%	\$26,567	19,062
7 Disc Single Cash - Rail	\$1.35	\$214,671	209,137	\$1.03	44.3%	\$95,069	92,618	55.7%	\$119,602	116,519
8 Disc Single Tkt - Rail	\$1.35	\$191,130	186,202	\$1.03	30.0%	\$57,339	55,861	70.0%	\$133,791	130,342
9 Daily Pass	\$7.00	\$4,673,933	3,206,186	\$1.46	59.6%	\$2,784,523	1,910,105	40.4%	\$1,889,410	1,296,082
10 Disc Daily Pass	\$3.50	\$2,328,169	2,052,586	\$1.13	60.7%	\$1,413,140	1,245,868	39.3%	\$915,029	806,717
11 Monthly Pass	\$110.00	\$9,216,730	3,405,157	\$2.71	26.4%	\$2,436,133	900,039	73.6%	\$6,780,597	2,505,118
12 Semi-Monthly Pass	\$60.00	\$405,689	241,984	\$1.68	44.6%	\$180,915	107,912	55.4%	\$224,774	134,072
13 Student Semi-Monthly	\$27.50	\$826,801	627,009	\$1.32	63.8%	\$527,791	400,254	36.2%	\$299,010	226,756
14 Senr/Disb Monthly/Semi	\$55.00	\$2,049,549	2,594,541	\$0.79	41.9%	\$857,886	1,086,005	58.1%	\$1,191,663	1,508,536
15 Super Senior Monthly Pass	\$42.00	\$25,737	34,474	\$0.75	41.9%	\$10,773	14,430	58.1%	\$14,964	20,044
16 Los Rios		\$2,154,066	3,553,518	\$0.61	57.8%	\$1,245,912	2,055,355	42.2%	\$908,155	1,498,164
17 CSUS		\$1,136,171	875,461	\$1.30	48.4%	\$549,877	423,700	51.6%	\$586,294	451,761
18 DHA		\$2,060,848	1,348,485	\$1.53	70.5%	\$1,451,961	950,069	29.5%	\$608,887	398,416
19 Fare Evader		\$0	1,263,163	\$0.00	43.8%	\$0	552,634	56.3%	\$0	710,529
20 Child		\$0	652,878	\$0.00	53.0%	\$0	346,026	47.0%	\$0	306,853
21 Lifetime		\$0	249,911	\$0.00	19.0%	\$0	47,602	81.0%	\$0	202,309
22 Other Boardings		\$0	335,786	\$0.00	53.0%	\$0	177,966	47.0%	\$0	157,819
		\$31,165,419	24,000,000	\$1.30		\$13,758,439	11,481,763		\$17,406,980	12,518,237

Low-income/non-low-income splits are based on RT's 2013 On-Board Survey. Low-income utilization rate is highest at 70.5 percent for the DHA pass, which provides free rides to persons on general assistance through an agreement with the Sacramento County Department of Human Assistance. Low-income utilization is lowest at 5.5 percent for the single prepaid ticket used on light rail. Prepayment tends to be an option only for customers with more regular income and therefore to skew away from low-income populations. Low-income utilization of the Super Senior pass is assumed to be the same as for Senior/Disabled Monthly/Semi stickers. Child and Other categories are assumed to match the systemwide average.



Appendix B Special Survey Results

Mobile Fare App Demographics

For the purposes of this Title VI analysis, users of the mobile fare app were assumed to be 67.2 percent minority and 43.7 percent low-income, based on passenger surveys conducted by RT. Availability of the mobile fare app to low-income customers was a particular concern. Use of the mobile fare app requires both a smart phone and a credit/debit card.

<u>Smart Phone Ownership</u> - A 2013 survey of 12,000 RT passengers found that 58 percent of low-income riders and 63 percent of non-low-income riders reported owning smartphones. With the growth of the smart phone market, an informal survey of 782 RT riders conducted in 2015-16 found that smart phone ownership had grown to 70 percent of low-income persons and 85 percent of non-low-income persons.

<u>Credit/Debit Card Ownership</u> - While smart phone use is relatively high among lowincome and non-low-income populations, credit/debit card use exhibits greater differences between groups. The same 2015-16 survey found that only 38 percent of low-income riders have both a smart phone and a credit/debit card; whereas 66 percent of non-low-income riders have both.

	Yes	No	Responses	% Yes	% No
Low Income	165	271	436	38%	62%
Non-LI	213	111	324	66%	34%
Responses	378	382	760	50%	50%
% Low-Income	44%	71%	57%		
% Non-LI	56%	29%	43%		

Figure 15 RT 2015-16 Passenger Survey Do You Own a Smart Phone and a Credit/Debit Card?

For the purposes of the Title VI analysis, the key figure was that persons who both own a smart phone and who own a credit/debit card are 43.7 percent low-income (and 56.3 percent non-low-income).

Smart phone and credit/debit card use did not exhibit significant differences in minority/non-minority utilization rate. Approximately 48 percent of minority and 50 percent of non-minority populations reported having both a smart phone and a credit/debit card.



Appendix B Special Survey Results

Golden 1 Employee Pass

Questionnaires were issued to riders of the Golden 1 employee shuttle on November 10, 2016. Ridership averages between 325 and 360 boardings each way per event. Surveys were completed by 64 riders for a 20 percent sampling rate. The survey found that 58 percent of riders are minorities (compared to 67 percent for the RT system) and that 27 percent of riders are low-income (compared to 48 percent for the RT system).

Users of the G1 Employee Pass pay zero out-of-pocket costs; however, RT collects \$500,000 per year for the program. At an estimated 283,200 boardings per year, RT expects to collect \$1.76 per passenger boarding, which is well above RT's systemwide average. From the standpoint of the passenger, the program amounts to a major discount (i.e., a free ride). However, from the standpoint of RT's cost recovery, it is among the higher per-passenger fares that RT collects.

For the sake of Title VI analysis, RT considers the fare collected by RT rather than the fare paid out-of-pocket by the customer. This is consistent with how RT treats the DHA pass, an unlimited-ride pass provided for free to persons on general assistance, paid for on their behalf by the Sacramento County Department of Human Assistance. It is also consistent with how RT treats regular tickets and monthly passes that are partially paid by an employer (e.g., State of California).



Appendix B Special Survey Results

Golden 1 Center Guests

The Special Event Group Fare and Round Trip Fare both have very low utilization because they are available and useable only on days of major events at the Golden 1 Center for event attendees. In order to estimate user demographics, a special survey was conducted on December 20, 2016 of 133 customers boarding RT light rail trains after a Sacramento Kings game.

This survey found that Kings attendees were 41.4 percent minority and 9.1 percent lowincome. Because there are very few low-income attendees, discount programs aimed at attendees tend to be poor from a Title VI standpoint; however, because total ridership is expected to be fewer than 500 riders per year for the Special Event Group Fare, and fewer than 300 boardings per year using the two Round Trip Fares combined, and because the savings per boarding are estimated at only \$0.08 for the Special Event Group Fare and only \$0.09 and \$0.05 for the full price and discount Round Trip Fares, when analyzed in aggregate (per RT policy and FTA guidance), the effects are very minimal, if not negligible. Accordingly, RT's analysis found there would not be any potential disproportionate burdens on low-income populations.

