

**DATE:** May 11, 2020

**TO:** Sacramento Regional Transit Board of Directors

**FROM:** Laura Ham, VP, Planning and Engineering

**SUBJ:** APPROVING SACRAMENTO REGIONAL TRANSIT DISTRICT'S TITLE VI PROGRAM UPDATE

#### RECOMMENDATION

Adopt the Attached Resolution.

#### **RESULT OF RECOMMENDED ACTION**

The result of this action is that the Board will approve SacRT's Title VI Program Update and maintain its compliance with the Federal Transit Administration's ("FTA") grant requirements.

#### FISCAL IMPACT

None.

#### DISCUSSION

As a condition of the Sacramento Regional Transit District's (SacRT) grant agreements with the Federal Transit Administration (FTA) and SacRT's annual certifications and assurances made to the FTA, SacRT is required to submit evidence to the FTA on a triennial basis documenting SacRT's compliance with requirements set forth in FTA Circular 4702.1B on Title VI of the Civil Rights Act of 1964, which states, in Section 601:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

SacRT's Title VI program expires on July 31, 2020. An updated, Board-approved program is due to FTA no later than June 1, 2020.

On April 1, 2020, SacRT released a draft report for public review (Exhibit A). The draft report was posted to SacRT's web site and publicized via SacRT's social media outlets, passenger newsletter, posters in SacRT bus and light rail vehicles, and via email announcements, with notices in six different languages in addition to English. The 30-day review and comment period will conclude on April 30, 2020. Examples of outreach, and comments received during the comment period have been included in Attachment 1.

#### Changes Since Last Update

Language Assistance Plan (LAP) –SacRT will update its translation policy to a tiered approach, similar to other larger systems. This approach groups documents and activities into three different tiers, and identifies the languages that need to be translated within each tier. See Appendix C for more information.

<u>Demographic Ridership Data</u> – In early 2020, SacRT began surveying its customers to provide the required demographic data for the Title VI Program Update, as well as other planning and analysis processes which require rider information. The COVID-19 outbreak interrupted that process, and on-board surveys had to be delayed. The results will be submitted to FTA as an amendment once the surveying and analysis can be completed. Appendix F is included as a placeholder for the results. FTA has authorized this approach for SacRT, in light of the COVID-19 pandemic.

<u>Service Monitoring</u> – SacRT's updated Service Monitoring evaluation found that there may be potential disparities in bus on-time performance between low-income and non low-income routes for weekend services. To address these potential disparities, SacRT will need to improve on-time performance on at least two deficient Saturday routes (Routes 11, 51, 58, 81, and/or 93) and at least one deficient Sunday route (Route 23, 56, 88, or 93). Note that FTA's service monitoring process requires an analysis of only routes where minorities comprise the majority in the service area; however, SacRT voluntarily follows the same process for routes that serve areas that are predominantly low-income. While federal policy does not require corrective action, for potential disparate impacts of this nature, this will be addressed in accordance with SacRT policy. See Appendix G for more information.

<u>Equity Analyses</u> – Since SacRT's last Title VI program update, SacRT has made three major service changes and five fare changes, each of which underwent a Title VI equity analysis, including:

April 2020 service changes
Causeway Connection Bus Service (fare and service)
Student Pass Program
2019 Fare Equity Analysis
September 2019 SacRT Forward service changes
Student Pass Fare Equity Analysis
2017 Fare Equity Analysis

The equity analysis for each of these changes is included in Appendix H.

#### Recommendations

Staff recommends the Board adopt the attached Resolution approving SacRT's Title VI program. Following Board approval, staff will transmit the report to FTA no later than the June 1, 2020 deadline.

## Attachment 1

## **Public Outreach and Comments**

### SacRT Website

	HOME	SCHEDULES & SERVICES	▼ FARES ▼ T
SacRT TITLE VI			
		itle VI Policy and Prog	ram Opdate
TITLE VI - PUBLIC R	EVIEW		
SacRT Seeking Public Com	ments on Title VI Program		
SacRT is currently updating	its Title VI civil rights program,	which documents SacRT's complia	ance with Federal non-
		t in the "Title VI Information" section	on below. SacRT is
accepting public comments	through April 30, 2020.		
Coments:			
SacRT Planning Dept.			
Attn: Sarah Poe			
P.O. Box 2110 Sacramento, C	CA 95812-2110		
Phone:			
SacRT Customer Advocacy D	Dept		
(916) 557-4545			
TDD: (916) 483-HEAR (4327)			
Email: spoe@sacrt.com			
Select this link to print a			
TITLE VI COMPLAINT FORM			
第六條款申訴表格			
Daim Ntawv Tsis Txaus Siab	VI		
ਟਾਇਟਲ VI ਿਸ਼ਕਾਇਤ ਫਾਰਮ			
Форма для подачи жалобь	и на основании раздела VI		
Formulario de queja del Títu	ılo VI		
Đơn Khiếu nại Tựa đề VI			
2020 SacRT Title VI Program	n & Assorted Attachments		
Title VI Program Report & Ap	pendices		
Program Update	Appendix A	Appendix B	Appendix C
Appendix D	Appendix E	Appendix F	Appendix G
		Appendix J /	Appendix K

## Title VI Update Available for Review and Comments

SacRT is currently updating its Title VI civil rights program, which documents SacRT's compliance with Federal non-discrimination requirements. Please visit sacrt.com to review the draft report. SacRT is accepting public comments through Thursday, April 30.

## Title VI Comments:

## SacRT Planning Dept

Attn: Sarah Poe P.O. Box 2110 Sacramento, CA 95812-2110 916-557-4545 spoe@sacrt.com

#### **Rider Alert E-mail**



## SacRT Seeking Public Comments on Title VI Program

SacRT is currently updating its Title VI civil rights program, which documents SacRT's compliance with Federal non-discrimination requirements. Please visit <u>sacrt.com</u> to review the draft report. SacRT is accepting public comments through April 30, 2020.

#### Comments:

SacRT Planning Dept Attn: Sarah Poe P.O. Box 2110 Sacramento, CA 95812-2110

Phone: SacRT Customer Advocacy Dept. (916) 557-4545 TDD: (916) 483-HEAR (4327)

Email: spoe@sacrt.com

#### SacRT solicita comentarios del público sobre el Programa del Título VI

SacRT se encuentra en este momento actualizando su programa de derechos civiles en virtud del Título VI, que documenta el cumplimiento de SacRT de los requisitos federales contra la discriminación. Visite <u>sacrt.com</u> para conocer el borrador del informe. SacRT acepta comentarios del público hasta el día 30 de abril de 2020.

Comentarios: SacRT Planning Dept (Departamento de planificación de SacRT) A la atención de: Sarah Poe P.O. Box 2110 Sacramento, CA 95812-2110

Teléfono: SacRT Customer Advocacy Dept. (Departamento de Defensa del Usuario de SacRT) (916) 557-4545

Correo electrónico: spoe@sacrt.com

## SacRT就Title VI 公民权利计划征集公众意见

SacRT 目前正在更新其Title VI公民权利计划,该计划记录了SacRT 遵守联邦非歧视要求的 情況。请访问<u>sacrt.com</u>查看报告草案。SacRT公众意见徵集截止日期為 2020年4月30日。

意見徵集: SacRT规划部 收件人:Sarah Poe 郵政信箱 2110 Sacramento, CA 95812-2110

电话: SacRT客户支持部 (916) 557-4545 TDD: (916) 483-HEAR (4327)

電子郵箱: <u>spoe@sacrt.com</u>

#### SacRT в поисках общественных комментариев к программе Title VI

В настоящее время SacRT обновляет свою программу по гражданским правам Title VI, которая документирует соответствие SacRT федеральным требованиям по недопущению дискриминации. Пожалуйста, посетите сайт <u>sacrt.com</u> для ознакомления с проектом доклада. SacRT принимает публичные комментарии до 30 апреля 2020 года.

Комментарии: Отдел планирования SacRT Кому: Sarah Poe Почтовый ящик (P.O.) 2110 Sacramento, CA 95812-2110

Телефон: Отдел по защите клиентов SacRT (916) 557-4545 Телекоммуникационное устройство для глухих (TDD): (916) 483-HEAR (4327)

Электронная почта: spoe@sacrt.com

#### SacRT Đề nghị Công chúng Cho nhận xét về Chương trình Tiêu đề VI

SacRT hiện đang cập nhật chương trình quyền dân sự Tiêu đề VI của mình, trong đó cung cấp tư liệu về việc tuân thủ của SacRT với các yêu cầu không phân biệt đối xử của Liên bang. Vui lòng truy cập sacrt.com để xem xét báo cáo dự thảo. SacRT đang tiếp nhận ý kiến công chúng cho đến hết ngày 30/04/2020. <u>sacrt.com</u>

Nhận xét gửi về: Phòng Kế hoạch SacRT Người nhận: Sarah Poe Hộp thư bưu điện: 2110 Sacramento, CA 95812-2110

Điện thoại: Phòng Vận động Khách hàng của SacRT (916) 557-4545 Thiết Bị Dành Cho Người Điếc: (916) 483-NGHE (4327)

E-mail: spoe@sacrt.com

## SacRT Tab Tom Nrhiav Zej Tsoom Sawv Daws Li Lus Qhia Tswv Yim nyob rau Lub Khoos Kas Tshooj VI

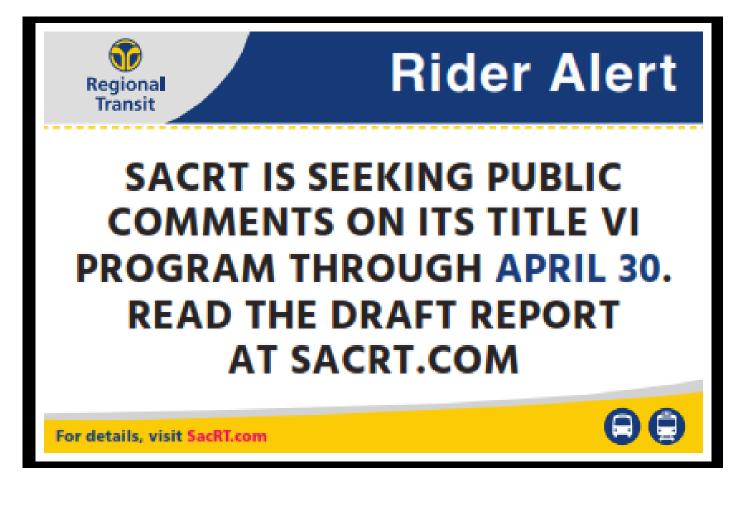
SacRT tab tom hloov kho nws lub khoos kas Tshooj VI txog pej xeem cov cai, qhov uas muaj cov ntaub ntawv uas SacRT yuav tau ua raws nrog rau Tsoom Fwv cov cai tsis pub muaj-kev ntxub ntxaug. Thov mus saib <u>sacrt.com</u> los tshab xyuas txog daim qauv ntawv tshaj tawm. SacRT yuav lees txais zej tsoom sawv daws cov lus qhia tswv yim mus kom txog Lub Plaub Hlis Ntuj Tim 30, 2020.

Cov Lus Qhia Tswv Yim: SacRT Planning Dept Attn: Sarah Poe P.O. Box 2110 Sacramento, CA 95812-2110

Xov Tooj: SacRT Chav Hauj Lwm Pab Txhawb Tub Lag Luam: (916) 557-4545 TDD: (916) 483-HEAR (4327)

Email: spoe@sacrt.com

**Mini Posters** 



## **Public Comments**

NAME	DATE	COMMENT	RESPONSE
Margie Donovan Feedback #86107	04/04/20	Please email me a copy of the draft document. If it is available in a non PDF format, I Would appreciate getting text or Word. I Am blind and use a screen reader, and most PDF documents are not accessible.	Thank you for contacting Regional Transit. Here is the Title VI Report and appendices in a Word document. Please let me know if you need anything else.
Glenda Marsh Feedback #	04/29/20	I found the 2020 Title VI Program report very informative and I learned a lot about SacRT's ridership demographics and required service standards and how various partners are so important for serving transit users. My comment on the report relates more to how the loss of ridership and temporary service cut back will affect meeting the service levels and thresholds required under Title VI and discussed in the report. For example, on-time performance for Saturday and Sunday service did not meet standard with "potential disparities found between low - income and non low -income routes." The report notes that "while federal policy does not require corrective action, this will be addressed in accordance with SacRT	Thank you for your comment regarding the Title VI Program Update. In accordance with SacRT policy and past practice, SacRT will develop a corrective action plan to address the deficiencies in on-time performance noted in the report. The first step of the corrective action plan will be to assess the problem in more detail. On-time performance problems are often but not always related to the schedule. Other factors may include operator behavior or road construction, so it is important to understand the root causes. Because the bus network was redesigned in September 2019, data before that time is of questionable validity, so we may wait to acquire more data and see if the problem persists. Since mid-March, schedule adherence has also been much better across the board,

m th d e in a g s p o h in H l e p in m p p o l s P l r a B	policy." I would like to hear nore about SacRT's policy hat addresses these lisparities and what can be expected to be done. Will mproving this performance, and restoring service levels in general during COVID 19 service recovery, be postponed due to reduction of operations budget, and for now long will restoration and mprovements be postponed? How will maintaining service evels under Title VI be prioritized over other service mplementation to ensure ninority and low-income populations will served promptly at the first opportunity? Is this something the Title VI Program addresses and if not, request that this question be aised at an upcoming SacRT Board meeting as an informational item. Thank you,	due to reduced traffic from the COVID-19 shelter in place orders, so data from mid- March on will also be of questionable validity. COVID 19 has caused major disruptions and we will have to have time to examine and address this further. At this point we aren't sure if budget issues will have impacts on service levels. It is too soon to tell. We are working on a service restoration plan to get us back to 100% as soon as we can. Thanks again for your comment.

#### RESOLUTION NO. 20-05-0024

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

May 11, 2020

#### APPROVING SACRAMENTO REGIONAL TRANSIT DISTRICT'S TITLE VI PROGRAM UPDATE

WHEREAS, the Sacramento Regional Transit District (SacRT) is required by the Federal Transit Administration (FTA) as a condition of Federal assistance to update its program for compliance with Title VI of the Civil Rights Act of 1964; and

WHEREAS, SacRT's existing Title VI Program will expire on July 31, 2020; and

WHEREAS, in early 2020 SacRT began conducting an on-board passenger survey to gather demographic ridership data to be included in the Title VI Program Update; and

WHEREAS, due to the COVID-19 pandemic, SacRT halted its on-board passenger survey; and

WHEREAS, SacRT intends to complete its on-board passenger survey once at a later date and will add the results as part of an amendment to the Title VI Program Update; and

WHEREAS, the Federal Transit Administration ("FTA") has authorized the postponement of the passenger survey and has granted SacRT permission to complete the process at a later date and submit its findings through an amendment to the Title VI Program Update; and

WHEREAS, the draft Title VI Program Update was publicized on SacRT's web site, in SacRT's passenger newsletter, in SacRT bus and light rail vehicles, and via email announcements; and

WHEREAS, comments were accepted from members of the public for a period exceeding 30 calendar days; and

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 of all equity analyses for major service and fare changes as set forth in Appendix H of Exhibit A; and

THAT, the Board of Directors has reviewed, is aware of, and approves the Service Monitoring report set forth in Appendix G of Exhibit A; and

THAT, the Board of Directors hereby approves the overall Title VI Program Update as set forth in Exhibit A.

STEVE HANSEN, Chair

ATTEST:

HENRY LI, Secretary

By:

Cindy Brooks, Assistant Secretary



April 1, 2020

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#### Appendices

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- Appendix B List of Title VI Complaints
- Appendix C Public Participation Plan
- Appendix D Language Assistance Plan
- Appendix E Construction Projects
- Appendix F Customer Demographics
- Appendix G Service Monitoring Report
- Appendix H Equity Analyses
- Appendix I Service Standards
- Appendix J Service Change Policy
- Appendix K Fare Change Policy

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## 1 Introduction

### 1.1 SacRT Profile

The Sacramento Regional Transit District (SacRT) began operation on April 1, 1973, with the acquisition of the Sacramento Transit Authority. In 1971, California legislation allocated sales tax money for local and statewide transit service, and created the organizational framework for SacRT pursuant to the Sacramento Regional Transit District Act.

An 11-member Board of Directors is responsible for governing SacRT. The Board is comprised of four members of the Sacramento City Council, three members of the Sacramento County Board of Supervisors, one member of the Rancho Cordova City Council, one member of the Citrus Heights City Council, one member of the Folsom City Council and one member of the Elk Grove City Council. The Board is responsible, among other things, for approving contracts, planning service and capital projects, passing ordinances, adopting the budget, appointing committees and hiring both SacRT's General Manager/Chief Executive Officer (GM/CEO) and Chief Counsel. SacRT's GM/CEO is responsible for carrying out the policies and ordinances of the Board, for overseeing SacRT's day-to-day operations, and for appointing the executive management of the various divisions.

SacRT provides bus and light rail service 365 days a year. Annual ridership has steadily increased on both the bus and light rail systems from 14 million passengers in 1987, when light rail operations began, to 21 million passengers in the fiscal year ended June 30, 2019. SacRT's entire bus and light rail system is accessible to the disabled community. Additionally, through a contract with Paratransit, Inc., SacRT provides origin-to-destination transportation service (in accordance with the Americans with Disabilities Act of 1990) for people that are unable to use fixed-route service.

#### *1.2 Requirements and Guidance*

As a condition of SacRT's grant agreement with the Federal Transit Administration (FTA) and SacRT's annual certifications and assurances made to the FTA, SacRT is required to submit evidence to the FTA on a triennial basis documenting SacRT's compliance with requirements set forth in FTA Circular 4702.1B on Title VI of the Civil Rights Act of 1964, which states, in Section 601:

No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

There are two Presidential Executive Orders that place further emphasis upon the Title VI protections of race and national origin.

Executive Order #12898 ("Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations") directs federal agencies to develop strategies to

address disproportionately high and adverse human health or environmental effects of their programs on minority and low-income populations.

Executive Order # 13166 ("*Improving Access To Services For Persons With Limited English Proficiency*") directs federal agencies to evaluate services provided and implement a system that ensures that persons with Limited English Proficiency are able to meaningfully access the services provided consistent with and without unduly burdening the fundamental mission of each federal agency. Additionally, each federal agency shall ensure that recipients of federal financial assistance provide meaningful access to their Limited-English-Proficiency applicants and beneficiaries.

Circular 4703.1 went into effect on August 15, 2012 to provide recipients of FTA financial assistance with guidance to incorporate environmental justice principles into plans, projects, and activities that receive funding from FTA.

Circular 4702.1B went into effect on October 1, 2012 to assist grantees in complying with Title VI of the Civil Rights Act of 1964. The purpose of this Circular is to provide recipients of FTA financial assistance with instructions and guidance necessary to carry out the U.S. Department of Transportation's Title VI regulations (49 CFR part 21).

#### 1.3 Checklist of Requirements

SacRT is required to submit the following information to FTA as part of the Title VI Program. SacRT subrecipients shall submit the information below to SacRT on a schedule to be determined by SacRT.

- Title VI Notice to the Public
- Title VI Complaint Procedure
- □ Title VI Complaint Form
- List of Transit-Related Title VI Investigations, complaints, and lawsuits
- Public Participation Plan
- □ Language Assistance Plan
- Table of Non-Elected Committees and Councils
- □ Subrecipient Monitoring
- Title VI Equity Analyses (Facilities, Service, and/or Fare)
- Board Resolution Approving Title VI Program
- □ Service Standards
- □ Service Policies
- Demographic and Service Profile Maps/Charts
- Demographic Ridership & Travel Patterns (collected by surveys)
- Service Monitoring (including Board Approval)

## 2 General Requirements

#### 2.1 Notice to the Public

*Requirement:* All recipients must provide a copy of the recipient's Title VI notice to the public that indicates the recipient complies with Title VI, and informing members of the public of the protections against discrimination afforded to them by Title VI, as well as a list of locations where the notice is posted.

*Response:* SacRT publicizes its Title VI notice in all buses and trains and online at www.sacrt.com. A copy of the Title VI notice has been provided in Appendix A. The notices are translated as outlined in the Language Assistance Plan in Appendix D.

#### 2.2 Complaint Procedures and Form

*Requirement:* All recipients must provide a copy of instructions to the public regarding how to file a Title VI discrimination complaint, including a copy of the complaint form.

*Response:* A procedure for filing a formal Title VI discrimination complaint can be found online at <u>www.sacrt.com/aboutrt/rttitlevi.aspx</u> and may also be obtained by contacting SacRT's Customer Advocacy Department. All complaints of a Title VI nature made through SacRT's ordinary complaints process (through SacRT's Customer Advocacy Department by phone, mail, email, or web form) are also flagged as Title VI complaints.

Once a complaint is submitted, SacRT will acknowledge receipt of the complaint within seven days. A final, written determination of the outcome of the complaint will occur no later than 30 working days of receipt. If the complaint is not substantiated, the complainant is also advised of his or her right to appeal.

The complaint form and procedure are included in Appendix A. The complaint form and procedure are translated as outlined in the Language Assistance Plan in Appendix D.

#### 2.3 Investigations, Complaints, and Lawsuits

*Requirement:* All recipients must provide a list of any public transportation-related Title VI investigations, complaints, or lawsuits filed with the recipient since the time of the last submission.

*Response: SacRT* flags any complaints made to SacRT's Customer Advocacy Department that may be related to Title VI, regardless of whether or not the complainant mentioned Title VI. At the time of preparation of this report, SacRT reviewed complaints filed during the past three-year period (2017 - 2020) and identified seven (7) Title VI-related complaints. All complaints were investigated and closed, as shown in Appendix B. No Title VI lawsuits were filed during the same period.

#### 2.4 Public Participation Plan

*Requirement:* All recipients must provide a Public Participation Plan that includes an outreach strategy for public engagement, such as a description of activities requiring outreach, methods of communication, strategies for in-person engagement, and identification of fully-accessible venues, as well as a summary of outreach efforts made since the last Title VI program submission.

Response: SacRT's Public Participation Plan (PPP) has been included as Appendix C.

#### 2.5 Language Assistance Plan

*Requirement:* All recipients are required to provide a Language Assistance Plan, which specifies policies and procedures for providing language assistance to Limited English Proficiency (LEP) populations, in accordance with U.S. Department of Transportation LEP Guidance.

Response: SacRT's Language Assistance Plan (LAP) has been included as Appendix D.

#### 2.6 Committee and Council Composition

*Requirement:* Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees and a description of efforts made to encourage the participation of minorities on such committees or councils.

*Response:* SacRT has one applicable body, the Mobility Advisory Council (MAC), which was established in 2005. The MAC is made up of seventeen members. Nine seats are designated for affiliates or representatives of agencies or organizations providing services or advocacy for persons with disabilities and/or older adults; these members are nominated to MAC by the designated agency or organization and confirmed by the SacRT General Manager/CEO. Eight seats are designated for at-large members, of which four are designated for representatives of older adults and four are designated for representatives of persons with disabilities; these members are selected by an interview panel and confirmed by the SacRT GM/CEO.

#### Advisory Body Composition

	White/ Caucasian	Hispanic/ Latino	Black/African American	Asian American/ Pacific Islander	Native American/ Alaska Native
SacRT's Service Area	48.9%	21.7%	10.2%	13.3%	0.6%
MAC Members	100%	0%	0%	0%	0%

Table 1. Mobility Advisory Committee Composition

As of the preparation of this report, there were three at-large vacancies and five organizational vacancies on the MAC. It has proved challenging in general to recruit viable members. SacRT does its best to ensure a diverse MAC, reflecting representation between seniors and those with varying types of disabilities, as well as minority representation. The MAC's 2020 Work Plan makes this recruitment effort a priority, and interest has been cultivated recently with several agencies and individuals to assist the MAC with this goal.

#### 2.7 Subrecipient Monitoring

*Requirement:* Primary recipients shall include a description of how the agency monitors its subrecipients for compliance with Title VI, and a schedule of subrecipient Title VI Program submissions. When a subrecipient is also a direct recipient of FTA funds, then that entity reports directly to FTA and the primary recipient is not responsible for monitoring compliance of that subrecipient.

*Response:* SacRT passes through federal funds from FTA to 11 subrecipient agencies, five of which are also direct FTA recipients and therefore report federal compliance activities directly to FTA. In accordance with SacRT's annual certifications and assurances, SacRT monitors subrecipient compliance with applicable federal rules and regulations, including Title VI for all non-direct FTA recipients.

Subrecipient Title VI program status is as follows:

Agency	Status	Comments
City of Sacramento	Expired	Expired 2019; awaiting submittal
City of Folsom	Pending	Expires 2020; awaiting submittal
City of Citrus Heights	Pending	Expires 2020; awaiting submittal
City of Placerville	Approved	Expires 2021
Paratransit, Inc.	Approved	Expires 2021
El Dorado Transit	Approved	Expires 2023

Table 2. Subrecipient Monitoring Status

In order to ensure that SacRT and its subrecipients are in compliance with the Title VI requirements, SacRT has developed a Subrecipient Monitoring Plan to manage and direct proper monitoring efforts. The monitoring plan contains elements including, but not limited to:

- Monitoring Frequency and Type
- Documentation and Analysis
- Periodic Monitoring (Audits)
- Reporting Structure
- Templates and Checklists
- Tracking Records

#### 2.8 Construction Projects

*Requirement:* If the recipient has chosen the location for a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.

*Response:* There have been no construction projects requiring a Title VI equity analysis during the three-year period of this analysis (2017 – 2020).

#### 2.9 Board Approval

*Requirement:* A copy of board meeting minutes, resolution, or other appropriate documentation showing the Board of Directors reviewed and approved the Title VI program must be included.

*Response:* This Title VI Program update document will be made available for 30-day public review on April 1, 2020 and will be presented to the SacRT Board of Directors for review and approval on May 11, 2020. A copy of the resolution approving this document will be furnished to FTA, as required.

## 3 Requirements of Transit Providers

The requirements in this section apply only to providers of fixed-route public transportation. FTA exempts small agencies from many of the transit-specific requirements; because SacRT operates 50 or more fixed-route vehicles in peak service and in an Urbanized Zone Area (UZA) of 200,000 or more in population, SacRT is subject to the full set of requirements in FTA Circular 4702.1B, Chapter IV, as follows.

#### 3.1 System-wide Service Standards and Service Policies

*Requirement:* All fixed-route providers must submit system-wide service standards and systemwide service policies. FTA requires quantitative standards for all fixed-route modes of operation for each of six categories: (1) passenger loading, (2) vehicle headways, (3) on-time performance, (4) service availability, i.e., coverage, (5) vehicle assignment, and (6) stop/station amenities. *Response: SacRT*'s Service Standards were adopted by the SacRT Board on August 26, 2013, as Resolution 13-08-0124 after an extended public review process that began in February 2013. A complete copy of these Service Standards has been provided as Appendix I.

#### 3.2 Demographic Maps and Charts

*Requirement:* Transit providers that operate 50 or more fixed-route vehicles in peak service and are located in an UZA of 200,000 or more in population shall include a demographic analysis of the transit provider's service area. This shall include demographic maps and charts completed since submission of the last Title VI program that contains demographic information and service profiles.

*Response:* Demographic maps and charts meeting FTA specifications were incorporated into SacRT's Service Monitoring Report, found in Appendix G.

#### 3.3 Demographic Ridership Data

*Requirement:* Transit providers that operate 50 or more fixed-route vehicles in peak service and are located in an UZA of 200,000 or more in population shall include data regarding customer demographics and travel patterns collected from passenger surveys.

*Response:* In Winter 2020, SacRT began surveying its customers in order to provide the required information for the Title VI Program Update, as well as other planning and analysis processes which require rider information. The outbreak of coronavirus, also known as COVID-19, interrupted that process, and on-board surveys had to be delayed. Appendix F is included in this Title VI Program as a placeholder for the results. They will be submitted to FTA as an amendment once the surveying and analysis is completed.

#### *3.4 Service Monitoring Report*

*Requirement:* Transit providers that operate 50 or more fixed-route vehicles in peak service and are located in an UZA of 200,000 or more in population shall include results of their program to monitor the performance of their transit system relative to their system-wide service standards and service policies not less than every three years, including evidence that the Board was aware of the results and approved the analysis.

*Response:* A Title VI Service Monitoring report, prepared in accordance with FTA Circular 4702.1B, is included in this report as Appendix G for review and approval by the SacRT Board.

#### 3.5 Major Service Change Policy

*Requirement:* Transit providers that operate 50 or more fixed-route vehicles in peak service and are located in an UZA of 200,000 or more in population shall include a description of the public engagement process for setting the major service change policy, disparate impact policy, and disproportionate burden policy, as well as a copy of Board meeting minutes or a resolution demonstrating the Board's consideration, awareness, and approval of the major service change policy and disparate impact policy.

*Response: SacRT*'s Service and Fare Change Policies were revised and restated in 2013 to bring SacRT into full compliance with the guidance set forth in FTA Circular 4702.1B. SacRT's Service and Fare Change Policies were developed in conjunction with SacRT's Service Standards, so that public engagement efforts could be combined.

In 2015, SacRT updated and restated its Fare Change Policy as a standalone document, and, accordingly, restated its Service Change Policy as a standalone document; however, there were no changes to SacRT's Major Service Change, Disparate Impact, or Disproportionate Burden definitions, and there have been no changes since the last Title VI Program.

The Service Change Policy, which includes the Major Service Change, Disparate Impact, and Disproportionate Burden Policies, is found in Appendix J, and the Fare Change Policy is in Appendix K.

#### 3.6 Service and Fare Equity Analyses

*Requirements:* Transit providers that operate 50 or more fixed-route vehicles in peak service and are located in an UZA of 200,000 or more in population shall include results of equity analyses for any major service changes and/or fare changes implemented since the last Title VI Program submission, as well as a copy of Board meeting minutes or a resolution demonstrating the Board's consideration, awareness, and approval of the equity analysis for any service or fare changes.

*Response:* Since SacRT's last Title VI program update, SacRT has undertaken seven equity analyses (see Appendix H):

Project	Analysis Type
Title VI Fare Equity Analysis (November 2017)	Fare
Student Pass Fare Equity Analysis (June 2018)	Fare
SacRT Forward Service Equity Analysis (February 2019)	Service
Title VI Fare Equity Analysis (February 2019)	Fare
Title VI Fare Equity Analysis Student Pass Program (July 2019)	Fare
Title VI Service and Fare Equity Analysis for Causeway Connection (October 2019)	Fare/Service
Title VI Service Change Equity Analysis for April 2020 Service Changes (November 2019)	Service

Table 3. Service and Fare Equity Analyses

# Appendix A

# Notice the Public, Complaint Procedures, and Form



Title VI Program Update 2020

Appendix A - Notice to the Public, Complaint Prodedures, and Form



#### **Title VI Public Notice**

Title VI of the Civil Rights Act of 1964 requires that "No person in the United States shall. on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

Any person who believes he or she has been discriminated against by RT may file a signed written complaint with RT within 180 days of the date of alleged discrimination either by:

#### Mail

Sacramento Regional Transit District Customer Advocacy Department PO Box 2110 Sacramento, CA 95812-2110

In Person Sacramento Regional Transit District Customer Advocacy Department 1221 R Street Sacramento, CA 95811

#### Общественное уведомление согласно Раздела VI

Раздел VI Закона о гражданских правах от 1964 года требует, что «ни один человек в Соединенных Штатах по мотивам расы, цвета кожи или национального происхождения не может быть отстранен от участия, от получения льгот или подвергаться дискриминации при проведении какой-либо программы или деятельности, которые получают финансирование из федерального бюджета».

Любой человек, который считает, что он подвергся дискриминации со стороны транспортного агентства Sacramento Regional Transit (RT), может подать в агентство письменную жалобу. Жалобу следует подавать в течение 180 дней с момента предполагаемой дискриминации

#### письменно по адресу:

Sacramento Regional Transit District Customer Advocacy Department P.O. Box 2110 Sacramento, CA 95812-2110

лично по адресу

Sacramento Regional Transit District Customer Advocacy Department 1221 R Street Sacramento, CA 95811

#### Công Bố về Tiêu Đề VI

Tiêu đề VI của Đạo Luật Dân Quyền năm 1964 đòi hỏi rằng "Không có người nào ở Hoa Kỳ, trên căn bản chủng tộc, màu da, hoặc nguồn gốc quốc gia, bị ngăn cản tham gia, bị từ chối phúc lợi, hoặc bị phân biệt đối xử theo bất cứ chương trình hay sinh hoạt nào được chính phủ liên bang tài trợ".

Bất cứ người nào tin rằng họ đã bị phân biệt đối xử bởi cơ quan RT, có thể nộp đơn khiếu nại bằng văn bản có chữ ký, gởi tới cơ quan RT trong vòng 180 ngày, kể từ ngày cáo buộc bị phân biệt đối xử, bằng một trong hai cách:

#### Thư Bưu Điên

Sacramento Regional Transit District Customer Advocacy Department P.O. Box 2110 Sacramento, CA 95812-2110

#### Hiên diên tai chỗ

Sacramento Regional Transit District Customer Advocacy Department 1221 R Street Sacramento, CA 95811

#### **Convocatoria Pública Título VI**

El Título VI de la Lev de Derechos Civiles de 1964 estipula que "Ninguna persona en los Estados Unidos deberá, por motivos de raza, color, o país de origen, ser excluida de participar en, ser negado los beneficios de, o ser sujeto a discriminación bajo cualquier programa o actividad que reciba asistencia financiera federal.

Cualquier persona que crea que él o ella ha sido discriminada por RT puede presentar una queja por escrito y firmada a RT en un plazo de 180 días siguientes a la fecha de la supuesta discriminación, ya sea por:

#### Correo

Sacramento Regional Transit District Customer Advocacy Department P.O. Box 2110 Sacramento, CA 95812-2110

#### En Persona

Distrito de Tránsito Regional de Sacramento Departamento de Apoyo al Cliente 1221 R Street Sacramento, CA 95811

#### 第六條 公告

1964年民權法案第六條規定, "在美國, 任何接受聯邦政府財政資助的項目或活動都不得 以種族, 膚色或國籍等任何理由, 排除任何人參與、或剝奪其權益或使人受到⊠視。

如有任何人認為他或🛛受到RT (區域交通局)的🖾視,都可在事發之日起的180天之內向 RT提交親筆簽字的書面申訴:

郵寄 Sacramento Regional Transit District Customer Advocacy Department P.O. Box 2110 Sacramento, CA 95812-2110

ਕਸਟਮਰ ਐਡਵੋਕੇਸੀ ਡਪਾਰਟਮੇਂਟ ਪੀ.ਓ. ਬਾਕਸ 2110

ਸੇਕਰਾਮੇਂਟੋ, ਸੀ ਏ-95812-2110

親自褫交 薩克拉門托區域交通局 客戶服務部 R街1221號,二樓 薩克拉門托, 郵編號: CA 95811

#### ਸਰਿਲੇਖ VI ਪਬਲਕਿ ਨੋਟਸਿ

1964 ਦੇ ਸਵਿਲ ਰਾਈਟਸ ਐਕਟ ਦੇ ਸਰਿਲੇਖ VI ਦੀ ਲੋਤ ਹੈ, ਕੀ "ਸੰਯੁਕਤ ਰਾਜ ਅਮਰੀਕਾ ਵੀਂਚ ਕਸਿੀ ਵੀ ਵਅਿਕਤੀ ਨੂੰ, ਨਸਲ, ਰੰਗ, ਜਾਂ ਰਾਸਟਰੀ ਮੂਲ ਦੇ ਆਧਾਰ ਤੇ ਫੇਡਰਲ ਵੀਤੀ ਸਹਾਇਤਾ ਪ੍ਰਰਾਪਤ ਕਰਨ ਵੀਂਚ ਹਸਿਾ ਲੈਣ ਤੋਂ ਕੱਢਣਾ, ਲਾਭ ਤੋਂ ਮਨਾਹੀ, ਜਾਂ ਕਸਿ ਵੀ ਪਰੋਗਰਾਮ ਜਾਂ ਸਰਗਰਮੀ ਦੇ ਅਧੀਨ ਵਤਿਕਰੇ ਦਾ ਸਕਿਾਰ ਨਹੀ ਕੀਤਾ ਜਾਵੇ।

ਕੋਈ ਵੀ ਵਅਿਕਤੀ ਜੋ ਵਸਿਵਾਸ ਕਰਦਾ ਹੈ ਉਸ ਨਾਲ RT ਦੁਆਰਾ ਵਤਿਕਰਾ ਕੀਤਾ ਗੀਆ ਹੈ ਵਤਿਕਰਾ ਕਰਨ ਦੀ ਤਰੀਕ ਦੇ 45 ਦਨਿ ਦੇ ਅੰਦਰ RT ਨਾਲ ਦਸਤਖਤ ਕੀਤੇ ਲਖਿਤੀ ਸਕਿਾਇਤ ਦਾਇਰ ਕਰ ਸਕਦਾ ਹੈ। ਜਾਂ ਤੇ

ਵਅਿਕਤੀਗਤ ਵਾੱਚ ਸੇਕਰਾਮੋਟੋ ਰੀਜਨਲ ਟ੍ਰਾਂਸਟਿ ਡਸਿਟ੍ਰਕਿਟ ਕਸਟਮਰ ਐਡਵੋਕੇਸੀ ਡਪਿਾਰਟਮੋਟ 1221 ਆੂਰ.ਸਟ੍ਰੀਟ ... ਸੇਕਰਾਮੇਂਟੋ ਰੀਜਨਲ ਟ੍ਰਾਂਸਟਿ ਡਸਿਟ੍ਰਕਿਟ ਸੇਕਰਾਮੇਂਟੋ, ਸੀ ਏੰ-95811

#### Nge VI Tsab Ntawy Faj Seem Rau Pej Xeem Huab Hwm

Nge VI ntawm Pej Xeem Huab Hwm Txoj Cai hauv 1964 txwv kom "Tsis kheev muaj ib tug tib neeg hauv Teb Chaws Asmeskas raug cais tawm, tsis kam muab kev pab rau, los yog raug kev ntxub ntxaug los ntawm tej kev pab los yog tes dej num uas tau nyiaj txiag txhawb los ntawm tsoom fwv teb chaws vim yog nws haiv neeg, cev nqaij daim tawv txawy xim los yog nws yug txawy lwm teb chaws tuaj.

Txhua tus tib neeg uas ntseeg tias nws raug kev ntxub ntxaug los ntawm RT ua tau tsab ntawy tsis txaus siab txog RT ua ntej 180 hnub txij li hnub iab liam muaj kev ntxub ntxaug los ntawm ib txoj kev nram no:

#### Xa Ntawy

Sacramento Regional Transit District Customer Advocacy Department P.O. Box 2110 Sacramento, CA 95812-2110

#### Qhia Tim Ntsej Tim Muag Sacramento Regional Transit District

Customer Advocacy Department 1221 R Street Sacramento, CA 95811

#### 916-557-4545 • sacrt.com



Online Notice: http://www.sacrt.com/aboutrt/rttitlevi.aspx

### Sacramento Regional Transit District Title VI Policy and Program Update

#### TITLE VI - PUBLIC REVIEW

#### TITLE VI INFORMATION

#### WHERE TO FILE A WRITTEN COMPLAINT?

By Mail

Sacramento Regional Transit District P.O.Box 2110 Sacramento, CA 95812 In Person

Sacramento Regional Transit District 1221 R Street Sacramento, CA 95811

#### HOW WILL THE COMPLAINANT BE NOTIFIED OF THE OUTCOME OF THE COMPLAINT?

SacRT will send a final written determination letter to the complainant. In a letter notifying complainant that the complaint is not substantiated, the complainant will also be advised of his or her right to appeal and the appeal process within seven calendar days of receipt. Every effort will be made to respond to the Title VI complaints within 30 working days of receipt, if not sooner.

If you need more information on SacRT's Title VI policy or assistance in filing a Title VI complaint, please call RT's Customer Advocacy Department at 916-557-4545.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following office:

Federal Transit Administration, Region IX Office of Civil Rights 201 Mission Street, Suite 1650 San Francisco, CA 94105-1839



#### Online Notice: http://www.sacrt.com/aboutrt/rttitlevi.aspx

#### HOW WILL THE COMPLAINANT BE NOTIFIED OF THE OUTCOME OF THE COMPLAINT?

SacRT will send a final written determination letter to the complainant. In a letter notifying complainant that the complaint is not substantiated, the complainant will also be advised of his or her right to appeal and the appeal process within seven calendar days of receipt. Every effort will be made to respond to the Title VI complaints within 30 working days of receipt, if not sooner.

If you need more information on SacRT's Title VI policy or assistance in filing a Title VI complaint, please call RT's Customer Advocacy Department at 916-557-4545.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following office:

Federal Transit Administration, Region IX Office of Civil Rights 201 Mission Street, Suite 1650 San Francisco, CA 94105-1839

If you need more information in the SacRT Title VI policy, help with the classification of a Title VI complaint, or a document translated into a language other than English, please call 916-557-4545.

Si necesita más información sobre la política del Título VI de SacRT, ayuda con la clasificación de la queja del Título VI o traducir un documento en un idioma distinto del inglés, llame al 916-557-4545.

Для получения дополнительной информации о политике SacRT в отношении раздела VI, помощи в классификации жалобы на основании раздела VI или переводе документа с английского на другой язык обращайтесь по номеру 916-557-4545.

如果您需要更多有關 SacRT 第六條款政策的資料,需要協助就第六條款申訴分類,或需要將文件翻譯成英文以外的語言,請撥打916-557-4545

Yog tias koj xav tau cov ntaub ntawv ntxiv nyob rau hauv tsab cai SacRT Title VI, xav tau kev pab txheeb xyuas qhov kev tsis txaus siab Title VI, lossis kom muab cov ntaub ntawv txhais ua lwm hom lus uas tsis yog lus Askiv, thov hu rau 916-557-4545.

Nếu bạn cần thêm thông tin về chính sách Tựa đề VI SacRT, trợ giúp phân loại khiếu nại theo Tựa đề VI, hoặc tài liệu được dịch ra ngôn ngữ khác ngoài tiếng Anh, hãy gọi 916-557-4545.



Complaint Form: http://www.sacrt.com/documents/titleVI/Title\_VI\_Complaint\_Form.pdf

#### Title VI Complaint Form

Title VI of the 1964 Civil Rights Act requires that "No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

The following information is necessary to assist us in processing your complaint. Should you require any assistance in completing this form, please let us know.

Complete and return this form to the Customer Advocacy Department, P.O. Box 2110, Sacramento, CA 95812 or in person 1221 R Street, Sacramento, CA 95811.

1.	Complainant's Name:		
2.	Address:		
3.	City:	_State:	Zip Code:
4.	Contact Number:	Cell Home _	_Work
5.	Person discriminated against (i	f someone other tha	an the complainant):
	Name:		
	Address:		
	City:	_State:	Zip Code:
6.	Which of the following best des took place? Was it because of		ou believe the discrimination
6.	•		ou believe the discrimination
6.	took place? Was it because of		ou believe the discrimination
6.	took place? Was it because of a. Race:		ou believe the discrimination
	took place? Was it because of a. Race: b. Color:	your:	



Complaint Form: http://www.sacrt.com/documents/titleVI/Title\_VI\_Complaint\_Form.pdf

8. In your own words, describe the alleged discrimination. Explain what happened and whom you believe was responsible. Please use the back of this form if additional space is required. 9. Have you filed this complaint with any federal, state, or local agency; or with any federal or state court? Yes \_\_\_\_\_ No \_\_\_\_\_ If yes, check each that applies: Federal Agency \_\_\_\_ Federal Court \_\_\_\_ State Agency \_\_\_\_ State Court Local Agency 10. Please provide information about a contact person at the agency/court where the complaint was filed. Name Address: \_\_\_\_\_ City: \_\_\_\_\_ State: Zip Code: Phone Number: 11. Please sign below. You may attach any written materials or other information That you think is relevant to your complaint.

Complainant's Signature

Date

# Appendix B

# List of Complaints

#### **Title VI Complaints**

#### January 1, 2017 – December 31, 2019

Note: All complaints related to racial discrimination are flagged by SacRT as Title VI regardless of whether or not complainant self-identified the complaint as a Title VI matter.

Feedback #	Date Received	Description of Incident	Status	Outcome
39120	03/29/2017	Complainant felt like the lack of security officers at the light rail stations were a Title VI concern.	Closed 03/30/2017	The complainants concerns were documented in our database and a response was sent regarding the security measures that were taking place related to SacRT.
39171	03/30/2017	Complainant reported that they had a concern that the makeup of the MAC Committee (Mobility Advisory Committee) is lacking Hispanic/Latino representation.	Closed 03/31/2017	Patron received a response that outlined the recruitment process and that the Recruitment for MAC members has been an on-going struggle, even past mailings to specific targeted groups have not produced the desired result. RT is continually looking for diverse candidates that represent our ridership of Seniors and patrons with disabilities. In this context, we are not only looking for diversity in ethnicities, but also representation of both seniors and individuals with disabilities as well as representation amongst the sexes. Within the



## Title VI Program Update 2020 Appendix B - List of Complaints

Feedback #	Date Received	Description of Incident	Status	Outcome
				disabled representation, we are additionally attempting to have representation of people with various types of disabilities such as mobility, hearing, visual and cognitive.
39660	04/17/2017	Complainant sent an email regarding his suggestion that: operators who speak a language other than English should be paid a differential.	Closed 04/17/2017	Replied via email response letting the patron know that their feedback was received, logged and would be shared with our Board of Director's and Customer Advocacy Department.
58124	07/23/2018	Complainant states that she was checked for fare on 07/20/18 and two other times by a Transit Officer and each time she was asked off the train to tap because her card did not have a valid tap. Feels as though she is being targeted because of the color of her skin.	Closed 08/17/2018	Patron was contacted via phone and it was discovered that she had not been "tapping" her card; therefore, the Transit Agent was following the policy (ask passenger to tap card). Customer appreciated the education. A brochure was mailed out with further instructions on how to use the Connect Card. No further contact has been received on this matter.
66410	02/25/2019	As a disabled senior, the drivers rarely wait till we sit before taking off. There is a substantial lack of telling boarding passengers to wait	Closed 02/25/2019	A letter was sent (via email) to complainant. The letter provided clarity to areas like Priority Seating, spotter



## Title VI Program Update 2020 Appendix B - List of Complaints

– Feedback #	Date	Description of Incident	Status	Outcome
	Received			
		till we deboard. Sudden		program, stop/starts
		starts and sudden stops are		before passenger takes a
		chronic. Another problem		seat, and mobility device
		drivers do not comply with		securement. Also
		senior/disabled seating		provided the direct
		Often times I Board the bus		contact information so
		with all senior/disabled		complainant can report
		seating filled by non disabled		specific situations
		or senior passengers. Start		when/if they are
		Appealing more to the White		observed. Advised the
		collar worker who doesn't		patron that the
		need public transport More		comments would be
		authority to drivers should be		included in the Title VI
		given to throw disruptive		plan/public feedback.
		passengers off the bus Finally		
		STOP criminalizing the poor		
		and homeless in front of god		
		and everyone by taking		
		fingerprints and photo. I also		
		notice that there is possible		
		violations of Title 6 by having		
		your agents on the light rail		
		only check AFTER the state		
		worker have already		
		unboarded the trains.		
		Tremendous inequity		
71668	06/19/2019	Complainant had questions	Closed	A response letter was
. 1000		and feedback related to the	2.0000	sent to the patron. The
		free student pass program.	07/18/2019	letter explained that
				SacRT was working with
				local schools. Also,
				thanked the complainant
				for the feedback and that
				it would be included in
				the public feedback.
	3/4/2020	The Blue Line consistently is	Closed	A response letter was
	5, 1, 2020	late or does not have enough		sent to the complainant.
		ate of does not have enough		sent to the complainant.



## Title VI Program Update 2020 Appendix B - List of Complaints

Feedback #	Date Received	Description of Incident	Status	Outcome
		cars to accommodate seating for all passengers or both. RT's target for on-time performance is 97% or plus. RT's vehicle assignment for the Blue Line is not consistent with its own policy, resulting in disparate impact. The standees on the trains at peak hours is dangerous and again, results in disparate impact.	03/17/2020	The letter explained that there was no evidence of on-time performance difference between the Blue Line and the Gold Line, and that passengers needing to stand during peak periods is common in the transit industry. Finally, it was noted that SacRT is pursuing funding to upgrade the rolling stock on its light rail lines to replace the aging vehicles.

Appendix C

**Public Participation Plan** 

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# 1 PURPOSE AND NEED FOR PUBLIC PARTICIPATION PLAN

As a public agency, the Sacramento Regional Transit District (SacRT) is obligated to proactively communicate information about its services, fares, and projects to its riders, member communities, and the general public. SacRT must also provide convenient ways for the public to participate in transit planning processes. The purpose of this Public Participation Plan is to explain how SacRT will do that. This section describes SacRT's services and communities served; explains the purpose and need for this plan; and describes the process of developing and adopting it.

## 1.1 Purpose and Need for this Plan

The purpose of this plan is to describe the information and public participation processes involved in the planning and delivery of SacRT's services and projects.

The need for this plan stems from SacRT's role as a public agency and recipient of federal transportation funds. SacRT must ensure that the benefits of its services are available as fairly as possible to all residents of member communities—and in a manner that reflects the values of these communities. In addition, SacRT needs to make sure its services are available equitably to all persons who are members of classes of individuals protected by federal and state laws.

To assure the stability and maximization of federal and institutional funding, SacRT must fulfill all relevant legal obligations for public participation for transit agencies that receive federal transportation funds, which require that there be locally developed processes to solicit and consider public comments before making any changes in fares, major changes in service, and/or capital project development.

## **1.2 Federal Protections**

To fulfill the purpose and needs described above, SacRT has prepared this plan consistent with the requirements of Title VI of the Civil Rights Act of 1964 and related statutes and regulations. Title VI prohibits discrimination in federally assisted programs and requires that "No person in the United States shall on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." The key objectives of Title VI that are relevant to this plan are to:

- Ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner.
- Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin.
- Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

Related federal nondiscrimination laws administered by the Federal Highway Administration, the Federal Transit Administration, or both prohibit discrimination on the basis of age, sex, and ability. Additionally, SacRT provides meaningful access to its programs, services, and activities to individuals with limited English proficiency, in compliance with US Department of Transportation policy and guidance on federal Executive Order 13166.

# **2** ACTIVITIES THAT INVOLVE PUBLIC PARTICIPATION

One of the key foundational pillars of the Title VI program is the assurance of community input into the transit decision-making process. The purpose of public participation is to offer early, continuous, and meaningful opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions. SacRT recognizes there are many different types of activities that require public participation and strives to use the strategies and procedures that are best-suited to each situation and type of information that need to be communicated to customers and the public.

Activities that require public participation fall into three broad categories:

- 1. Activities that require formal public hearings;
- 2. Activities that involve the SacRT Advisory Board and Subcommittees;
- 3. Activities that involve public processes of other agencies.

These outreach efforts are tailored to the specific needs of the audiences and the goals of the feedback activity, as outlined in Section 3.

## 2.1 Activities that Require Formal Public Hearings

There are eleven types of activities for which SacRT is required to conduct formal public participation which are outlined in Section 2 of the SacRT Service Change Policy. Minor service changes can be authorized by SacRT's General Manager/CEO and major service changes require a public hearing, a Title VI equity analysis and approval by the SacRT Board.

## 2.2 Activities that Involve the SacRT Advisory Board and Subcommittees

It is the policy of the Board of Directors of the Sacramento Regional Transit District to encourage participation in the meetings of the Board of Directors. At each open meeting, members of the public are provided with an opportunity to directly address the Board on items of interest to the

public that are within the subject matter jurisdiction of the Board of Directors.

The Regional Transit Board of Directors Meeting is videotaped. A replay of this meeting can be seen on Metrocable Channel 14 and is webcasted at <u>www.sacmetrocable.tv</u>. Any person(s) requiring accessible formats of the agenda or assisted listening devices/sign language interpreters should contact the Clerk of the Board at (916) 556-0456 or TDD (916) 483-4327 at least 72 business hours in advance of the Board Meeting.

Copies of staff reports or other written documentation relating to each item of business referred to on the agenda are on SacRT's website, on file with the Clerk to the Board of Directors of the Sacramento Regional Transit District, and are available for public inspection at 1400 29th Street, Sacramento, California. Transit access is available via the 29th Street Light Rail Station, and local buses # 30, 38, 67, and 68. Any person who has any questions concerning any agenda item may call the Clerk to the Board of Sacramento Regional Transit District.

The meetings of the SacRT Advisory Board are a regular venue for public participation. There are regularly scheduled 24 meetings per year, and time for public comment is reserved at each meeting. For participation in capital, financial, and service planning, SacRT encourages public attendance at these meetings, as well as those of the Advisory Board's Financial, Paratransit, and Route Planning subcommittees. The dates, times and locations of all these meetings are posted on <u>www.sacrt.com/services/sacrtcalendar.aspx</u>.

SacRT Advisory Board members function as liaisons to their respective communities, sharing information with residents, local officials, and municipal agencies; board members also share comments from the SacRT customers, officials, businesses, and other constituents of their communities.

## 2.3 Activities that Involve Public Processes of Other Agencies

SacRT also participates in the public participation processes held by other agencies that pertain to plans and projects of the SacRT, thereby offering additional opportunities for public participation of people who wish to learn about and comment on SacRT services and projects.

## 2.3.1 Mobility Advisory Council

The SacRT Mobility Advisory Council (MAC) meets the first Thursday of every month at 2:30 p.m. in the Regional Transit Auditorium at 1400 29th Street, Sacramento. Transit access is available via the 29th Street Light Rail Station, and local buses # 30, 38, 67, and 68. Meeting agendas are presented as live-text screen readable PDF documents (Note: Agenda PDFs are generally available approximately one week before meeting date). Persons may contact SacRT's Accessible Services Department at (916) 557-4685 or TDD (916) 557-4686 to find more information about the Mobility Advisory Council.

## 2.3.2 Unmet Transit Needs

In accordance with the California Transportation Development Act (TDA), SacRT participates in official Unmet Transit Needs hearings for the portions of Sacramento County served by SacRT, which are coordinated by and the responsibility of the Sacramento Area Council of Governments (SACOG). The purpose of the hearings is to officially solicit, assess, and document unmet transit

needs, as a condition of certain state funding programs under the TDA.

Notices for Unmet Transit Needs hearings are prepared by SACOG in Spanish and English and distributed by SacRT in all buses and light rail vehicles. Hearings are held in public at 1400 29th Street, Sacramento and presided over by one member of the SACOG board of directors. SacRT's role is to field technical questions about existing and upcoming service from members of the public and to furnish a staff member to serve on the Social Service Technical Advisory Committee, which is charged with officially assessing the reported unmet needs. (Note: To arrange with SACOG for non-English language or sign language interpreters, please call (916) 321-9000 or TDD access (916) 321-9550 at least 72 hours prior to the meeting). Paratransit service is also available for riders with qualifying disabilities, and meetings are accessible to people with disabilities. Transit access is provided by local bus routes 30, 38, 67, 68 and Gold Line.

## **3 PUBLIC PARTICIPATION STRATEGIES AND METHODS**

SacRT is committed to monitoring and tracking its public participation activities and sharing results in a transparent way. SacRT continues to modify its public participation activities over time, based on feedback and direction provided by community members and by setting and evaluating performance measurements for public participation. Along with providing information, SacRT lets participants know how they can stay informed about SacRT activities, including webbased information, project information, and surveys. Low-income and minority communities within SacRT's service area are identified geographically using the most recent census data available from the U.S. Census Bureau.

This section describes the public participation strategies and methods are that are available to SacRT. These are selected and implemented on the best judgment of SacRT staff and Advisory Board members with respect to the criteria above. SacRT utilizes strategies recommended by community members for a specific neighborhood or population group. SacRT also recognizes that public participation can be a fluid process, and that outreach measures may be added or altered depending on the scale of a proposal's impact and changes in the level of public interest.

## 3.1 SacRT Customer Service and Marketing

SacRT's Marketing and Communication division is responsible for ensuring project information, including changes to major projects, service changes, fare changes, new service implementation, service headway changes, and route detours, is conveyed to the public. Responsibilities of the division include the following:

- Developing and maintaining positive and effective communication with the community and various levels of government that interface with or impact the development of programs and operations at SacRT;
- Paid advertising with local media outlets, including minority-focused media, to air public service announcements and messages to make customers aware of SacRT services and ways to contact the authority;
- Public events to coordinate with individuals, institutions, and organizations to introduce new services, support existing services, vehicles, facilities, customer conveniences, and

organizational milestones;

- Providing opportunities for public participation through alternative means other than written communication, such as personal interview or use of audio or video recording devices to capture oral comments;
- Using locations, facilities, and meeting times that are convenient and accessible to lowincome and minority communities;
- Developing comprehensive communication plans that ensure the delivery of information on SacRT's programs and activities through alternative means. This includes, but is not limited to, translation of vital information into other languages, alternative formats for individuals with disabilities, and the use of communication strategies outside of advertising in the largest circulation newspaper.

## **3.2 Notices on Vehicles**

Postings of special printed participation activities are produced by SacRT and are available in multiple languages to ensure compliance with the Language Assistance Plan. Public notices include brochures, flyers, and posters. Brochures are used to provide more content and serve as an information source, whereas posters are designed to publicize activities and highlight key information such as date, time and location of the activity. These materials are distributed systemwide and/or in targeted areas. They are also available at SacRT light rail stations, as passenger bulletins and notices placed on train seats.

In addition, the SacRT Bus and Light Rail timetable book provides basic information in languages other than English as outlined in the Language Assistance Plan, including information on fares, telephone information, SacRT's Customer Service and Sales Center, and basic information on how to ride SacRT buses and light rail trains. A general statement on how to obtain telephone information in multiple languages is listed on individual pocket timetables, which is listed as, "For route, schedule and fare information, call 916-321-BUSS (2877) or visit www.sacrt.com." Printed pocket timetables are also available on buses and light rail trains, at the SacRT Customer Service and Sales Center, and are distributed to libraries, schools, colleges and other high-traffic destinations.

SacRT utilizes international symbols (pictograms) in its signage in order to communicate with non-English-speaking customers, as well as customers who are unable to read written language. Pictograms were incorporated into signage beginning in 2013.

#### Figure 1. Local Bus Advertisement



# Inscríbase en ConnectTransitCard.com

## 3.3 Internet Communication

The SacRT's website (<u>www.sacrt.com</u>) is the agency's primary channel for public information and participation. All relevant news and information about bus schedules, paratransit services, planning projects, agency governance, compliance with regulations, employment opportunities, vital documents related to service benefits, and many other topics are posted on this website. Importantly, the monthly "Next Stop Newsletter" page (found at <u>http://www.sacrt.com/apps/next-stop-news/</u>) is available on the agency's web page and includes ticket fare information, rider discounts for special events, and current and/or upcoming service changes.

SacRT also uses these social media services to communicate with bus riders:

- Facebook (<u>facebook.com/SacramentoRT</u>)
- Twitter (<u>twitter.com/RideSacRT</u>)
- Instagram (Instagram.com/RideSacRT)

The information above is also available online at SacRT's website through a series of links at the bottom of the page, one for each language.

## 3.4 Media

SacRT has multiple partnerships across cultural and linguistic groups in its service area. For example, SacRT has partnered with Crossings TV, a local television station offering multi-cultural programming, to assist with outreach at major community events, specifically Russian, Chinese, Vietnamese and Hmong celebrations. In 2014, SacRT developed "how to ride" TV commercials for Russian, Chinese, Vietnamese and Hmong viewers for broadcast on Crossings TV. In 2015, SacRT established a partnership with the Russian American Media Group to assist with outreach to the Slavic communities. The partnership extended to community events, such as the International Kids Day celebration, as well as print publications distributed throughout the

Sacramento region. More information on multi-lingual outreach efforts can be found in the Language Assistance Plan.

In addition, SacRT provides public notices in local schools, public libraries and community centers in areas where service changes are occurring, including route-level outreach. The media relations involve a various levels of outreach methods, which include:

- Press releases;
- Community calendar listings in newspapers, community newsletters, email lists, websites, and other media;
- Reciprocal sponsorships with radio, TV and internet media outlets;
- Making public information available in easy-to-understand formats;
- Public media (including local minority and non-English newspapers, radio stations, and television stations);
- Posters, display boards, and flyers;
- Fact sheets;
- Brochures;
- Public service announcements;
- Mailing and email lists;
- Information stands at local events.

#### Figure 2. Social Media Public Outreach



## 3.5 Public Meetings

Public meetings are critical to public participation. SacRT holds many types of public meetings, including:

- Formal meetings with specific agendas;
- Informal workshops;
- Open houses where members of the public may speak individually or in groups with SacRT staff;
- Media events that provide a setting for SacRT representatives to speak directly with members of the public;
- Public hearings that are required by the SacRT Public Hearing Policy;
- Public comment time at all SacRT Advisory Board meetings.

SacRT holds all its public gatherings in facilities that are accessible for people with disabilities and, wherever possible, near a bus route. SacRT typically reviews demographic information about area where the meeting is to be held to decide when notices should be translated into languages other than English.

## 3.6 Accessibility and Public Engagement

When choosing the location for a community event, SacRT staff consider a number of factors to ensure that the location is easy to get to and accessible for those who wish to attend and participate. All community events should be located within a project's affected community or study area and be accessible by public transit when available. The location must also be accessible to participants with disabilities and compliant with State and Federal accessibility regulations. In order to achieve this, SacRT considers several factors before choosing a meeting location. Some of these requirements include, but are not limited to:

- Accessible Parking;
- Accessible Entrances;
- Accessible Restrooms;
- Accessible Meeting Room;
- Space and Signage for Foreign Language Interpreters;
- Adjustable Microphones and Podiums.

Beyond ensuring that a public meeting is physically accessible, other accommodations are also considered. When the public has an accessibility or language accommodation request, they can make their request through a designated SacRT contact person, which should always be listed on any community event notice or flyer. Examples of specific accommodations that can be provided to individuals in order to allow them to meaningfully participate in a community event include the following:

- Documents in Alternative Formats (large print, electronic, braille or audible);
- Translated Documents;
- Assistive Listening Devices;
- Closed Captioning;
- American Sign Language (ASL) Interpreters;
- Foreign Language Interpreters.

## 3.7 Surveys

SacRT actively solicits public participation through reoccurring surveys of customers and the regional travel market throughout the year. These include:

- Bus rider customer satisfaction surveys;
- Bus rider route-specific surveys;

- Paratransit van riders satisfaction surveys;
- Paratransit van riders service-specific surveys;
- Non-transit rider market surveys.

## 3.8 Participating in Meetings Held by Other Community Groups

SacRT has partnered with community groups to extend its reach regarding service and fare change and help partner with organizations to provide information that is of interest to groups they represent. Participation activities are publicized in local community newsletters, flyers and other publications. SacRT provides text and, as appropriate, photos or maps that an organization can adopt for inclusion in its own publication. If needed, SacRT has provided translated text. In addition, SacRT maintains communications with community partners, so it is aware of publication schedules and key communication activities.

## 3.8.1 See Track? Think Train! Awareness Campaign

In March 2015, SacRT in partnership with Operation Lifesaver (OL) launched a light rail safety campaign that emphasized pedestrian and motorist safety around tracks. "See Tracks? Think Train!"





"See Tracks? Think Train!" is a simple message originated by OL, but one that can save lives. It is SacRT's goal to eliminate incidents by using education and outreach to remind the public of the proper behavior to stay safe. The campaign included the distribution of print materials in English, Spanish and Hmong. Campaign messages focused on the danger of distractions near tracks and in stations, and the

importance of respecting warning signs and signals. The "See Tracks? Think Train!" campaign was initially focused in the south Sacramento community, which has a high concentration of Spanish and Hmong speaking residents, in preparation for the start of the Blue Line to Cosumnes River College light rail extension service. Information was distributed in English, Spanish and Hmong.

### 3.8.2 Community Outreach Partnership – City Year Sacramento

City Year is a national organization that is focused on fighting the national dropout crisis through the use of volunteers and sponsors. SacRT provides monthly transit passes for volunteers in exchange for promotion of SacRT services and programs.

City Year volunteers are committed to serving as tutors, mentors and role models in schools to help low income and at-risk students stay on track to graduate from high school. City Year enlists the help of full-time volunteers (age 17 through 24) that are committed to the program for 10 months (during the traditional school year) to serve as positive role models in the community and schools.

Most volunteers are from outside the Sacramento area and depend on public transit during their 10month stay. City Year AmeriCorps volunteers serve as transit ambassadors and raise awareness of transit-related programs and projects to elementary, middle and high school students at seven Sacramento City Unified School District schools with high populations of limited-English- speaking students.

Father Keith B. Kenny K-8 School Languages Spoken: Chinese, Hmong and Spanish

Fern Bacon Middle School Languages Spoken: Hmong and Spanish

Leataata Floyd Elementary Languages Spoken: Chinese, Hmong, Spanish and Vietnamese

Oak Park Preparatory Academy Languages Spoken: Hmong and Spanish

Oak Ridge Elementary Languages Spoken: Hmong and Spanish

Rosa Parks K-8 School Languages Spoken: Hmong, Russian, Spanish and Vietnamese

Sacramento Charter High School Languages Spoken: Spanish

### 3.8.3 Community Outreach Partnership – Crossings TV and Russian American Media Group

SacRT has partnered with Crossings TV, a local television station offering multi-cultural programming, to assist with outreach at major community events, specifically Russian, Chinese, Vietnamese and Hmong celebrations. In 2014, SacRT developed "how to ride" TV commercials for Russian, Chinese, Vietnamese and Hmong viewers for broadcast on Crossings TV. In 2015, SacRT established a partnership with the Russian American Media Group to assist with outreach to the Slavic communities. The partnership extended to community events, such as the International Kids Day celebration, as well

as print publications distributed throughout the Sacramento region.

### 3.8.4 SacRT Leadership in Minority Organizations

Members of SacRT's Executive Management Team hold positions on the Board of Directors for the following major ethnic organizations:

Organization	SacRT Representative
Sacramento Asian Pacific Chamber of Commerce	CEO/General Manager
Sacramento Hispanic Chamber of Commerce	Deputy Chief Counsel
Sacramento Black Chamber of Commerce	Special Assistant to the General Manager/CEO's Office

Through involvement and sponsorship of these organizations, SacRT is better able to communicate and network with these minority communities regarding SacRT's services and initiatives, as well as the rights of their members under Title VI.

## **4 SUMMARY OF OUTREACH EFFORTS**

Since the 2017 Public Participation Plan, outreach activities have included:

- Community Events/Sponsorships
- MLK March and Expo
- Tet Festival
- Chinese New Year Celebration
- Sacramento Valley Station Renovations Grand Opening
- Black Expo
- Cesar Chavez March
- Laurel Ruff Transition School
- Healthy Kids Day
- Senior Health Faire
- Family Safety and Health Expo
- Essence of Chinese Food Culture
- Earth Day
- Taco Festival
- Rancho Cordova July Fourth
- Greater Urban League
- Elk Grove Multi-Cultural Festival
- Festival Latino
- Black Heritage Month
- Marketing/Outreach Campaigns
- Connect Card
- Re-Imagine Watt/I-80

- PaRT of Life (ridership increase campaign)
- SmaRT Ride
- Folsom Late Night Service
- We HeaRT You (fare and service improvements campaign)
- Free parking at Park-and-Ride Lots
- Get on Board Day
- SacRT Forward (bus network redesign)
- Causeway Connection (UC Davis service expansion)
- Holiday Bus Fundraiser
- Stakeholder Meetings at SacRT Offices
- Unmet Transit Needs rider meetings
- Transit Center customer outreach
- On-board rider outreach

In addition to community events, SacRT participates in hundreds of pop-up events each year throughout its service area to share vital information with customers and the public. In 2019, SacRT hired a group of temporary employees, creating a "street team" to ride buses and light rail trains to share service information.

# Appendix D

# Language Assistance Plan

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Updated April 1, 2020

Pursuant to Title VI of the Civil Rights Act of 1964, DOT's implementing regulations, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, Aug. 11, 2000), Federal Transit Administration (FTA) funding recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who have Limited-English Proficiency (LEP).

SacRT provides essential mobility for LEP persons. SacRT therefore takes steps to ensure access to the benefits, services, information and other important portions of SacRT programs and activities for LEP populations. This Language Assistance Plan (LAP) includes a Four Factor analysis, which is used to determine the language assistance needs from the public and capability of SacRT to meet them. This plan works in concert with the SacRT Public Participation Plan (PPP), which allows all persons to effectively participate in SacRT's decision-making process. Combined with this LAP, these plans constitute SacRT's official policy and evidence of compliance with FTA directives on language assistance and public participation.

## Four Factor Analysis

In order to best ensure the most meaningful access to SacRT programs, services, and activities for LEP populations, SacRT conducted a Four Factor Analysis in 2017, as suggested in the federal guidance to assist with LAP program development. This report updates the 2017 report.

The updated analysis began in the winter of 2020 with research and data collection from multiple sources, and continued with telephone and staff interviews, as well as surveying efforts conducted in February and March 2020. The following four factors have been utilized in language access planning throughout the development of the LEP program, also known as a Language Assistance Plan:

**Factor 1 -** Estimate the number or proportion of LEP persons served or encountered in the eligible service population.

**Factor 2 -** Assess the frequency with which LEP persons come in contact with SacRT programs, activities or services.

**Factor 3 -** Assess the importance to LEP Persons of SacRT's programs, activities and services.

**Factor 4 -** Evaluate the resources available to SacRT and overall cost to provide LEP assistance.

## FACTOR 1

Estimate the number or proportion of LEP persons served or encountered in the eligible service population.

The guidance states: "the greater the number or proportion of LEP persons from a particular language group served or encountered in the eligible service population, the more likely language services are needed."

SacRT has utilized the following data sources to obtain information in determining the most common languages spoken in the SacRT service area by LEP persons:

- US Census Bureau's 2011-2015 American Community Survey (ACS)
- California Department of Education

FTA describes limited English proficiency as having a limited ability to read, write, speak, or understand English. Data from the 2011–15 ACS five-year estimates were used to analyze the number of LEP persons living in Sacramento County. The US Census table, "Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over" was used to estimate the number of LEP people for all census tracts within the county. To calculate the number of people with limited English proficiency, the counts of people who self-reported to speak English less than "very well" were summed.

The total LEP population in Sacramento County is 185,903 people, or approximately 13.6 percent of the total population above the age of five. The largest single group of LEP persons is composed of Spanish speakers, which represent 37.7% of the LEP population of the service area; approximately 72,108 people in Sacramento County area are limited-English Spanish speakers. The top five language groups (Table 1) of LEP persons within the service area make up 69.3% percent of the total LEP population.

Language Spoken at Home	Persons	Percent of Total Population	Percent of LEP Population
Spanish or Spanish Creole	72,018	5.3%	38.7%
Chinese	21,025	1.5%	11.3%
Vietnamese	13,133	1.0%	7.1%
Russian	12,989	1.0%	7.0%
Hmong	9,586	0.7%	5.2%

Table 1. People in the SacRT Service Area Who Speak English Less than "Very Well" at Home

Source: U.S. Census Bureau, 2011 to 2015 American Survey Community 5-Year estimates

USDOT "safe harbor" guidance from FTA C 4702.1B states that a recipient of FTA funds should provide "written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered." The total population age 5 years and older estimated by the 2011 to 2015 ACS for Sacramento County area is 1,366,795. Table 6 shows 22 languages with more than 1,000 estimated LEP persons. Overall, the ACS 5-year data reported 88 different languages spoken in the service area.

Language	LEP	Population	Percent	of	Total
	Estimate		Populatio	n	
Spanish or Spanish Creole	72,018		5.3%		
Chinese	21,025		1.5%		
Vietnamese	13,133		1.0%		
Russian	12,989		1.0%		
Hmong	9,586		0.7%		
Tagalog	8,795		0.6%		
Other Indic languages	7,816		0.6%		
Other Slavic languages	6,184		0.5%		
Other Asian languages	4,223		0.3%		
Hindi	4,082		0.3%		
Korean	3,177		0.2%		
Other Pacific Island languages	2,565		0.2%		
Other Indo-European languages	2,462		0.2%		
Persian	2,319		0.2%		
Arabic	2,254		0.2%		
Laotian	2,054		0.2%		
Japanese	1,743		0.1%		
Armenian	1,467		0.1%		
African languages	1,349		0.1%		
Mon-Khmer, Cambodian	1,194		0.1%		
Other Languages	5,468		0.4%		
Total	185,903		13.6%		

### Table 2. Safe Harbor Languages

Source: U.S. Census Bureau, 2011 to 2015 American Survey Community 5-Year estimates

In addition to the ACS 2011-2015 five-year estimates, the Factor 1 analysis considered language data from the California Department of Education (CDE) English Language Learners Database (ELL). The state's ELL Database is another tool for identifying concentrations of potential LEP populations based on recent public school enrollment data.

This data includes statistics on the language spoken at home by students who are English learners for primary and secondary school students ranging from kindergarten to high school. It is assumed that if children are identified as speaking a language other than English and are considered "English Learners," then their parents or adult guardians are likely to speak the same language at home. This dataset can be helpful in determining concentrations of the population speaking a similar language.

The CDE reported a 2018 to 2019 enrollment of 499,327 students within the 375 primary and secondary schools in Sacramento County. Table 3 shows the breakdown for the languages with more than 1,000 English learners. The CDE language Census data reported 62 separate languages spoken by students in the service area.

Language	Total ELL Students	Percent of Total	
Spanish	20,757		49.5%
Russian	3,105		7.4%
Hmong	2,776		6.6%
Chinese*	1,796		4.3%
Farsi (Persian)	1,453		3.5%
Vietnamese	1,319		3.1%
Arabic	1,224		2.9%
Pashto	1,139		2.7%
All Others	7,133		17.0%
Total	41,903		100%

Table 3. English Language Learners in Sacramento County K-12 Schools

Source: Language Census Data - 2018-19 School Year, California Department of Education. \*Mandarin and Cantonese have been combined into "Chinese" for comparability with U.S. Census Bureau data.

ACS data was mapped to provide a geographic representation of where concentrations of LEP persons live and to show what languages are spoken at home in those areas. Figure 1 shows the percentage of LEP persons by census tract, regardless of the language spoken at home.

To identify locations containing large concentrations of LEP individuals that belong to the top five language groups, each language group was mapped with the ACS data as well as the ELL data by school and language. These maps are depicted in Figure 2 through Figure 6.

Spanish speaking populations reside in many Sacramento area neighborhoods, including South Sacramento centered on Franklin Boulevard between 12th Avenue and Mack Road, Oak Park, Stockton Boulevard, North Highlands, Foothill Farms, Rancho Cordova, Natomas, Del Paso Heights and Northgate.

Chinese-speaking populations include both Mandarin and Cantonese languages. A large number of Chinese-speaking LEPs reside in and around South Sacramento, between Stockton Boulevard and Power Inn Road and the Greenhaven-Pocket area.

Many Russian speaking neighborhoods are located near Greenback Lane, Auburn, Antelope Road, and North Highlands.

Sacramento's largest Vietnamese population is located in South Sacramento. This community includes a two-mile stretch between Fruitridge Road and Florin Road on Stockton Boulevard.

The Hmong population in Sacramento County is among the largest in the country, along with the City of Fresno. A majority of the Hmong community is located in South Sacramento near or along Meadowview Road, Mack Road, and Detroit Boulevard. Susan B. Anthony Elementary School, which is located on Detroit Boulevard, is home to the only Hmong dual-language immersion program on the West Coast.

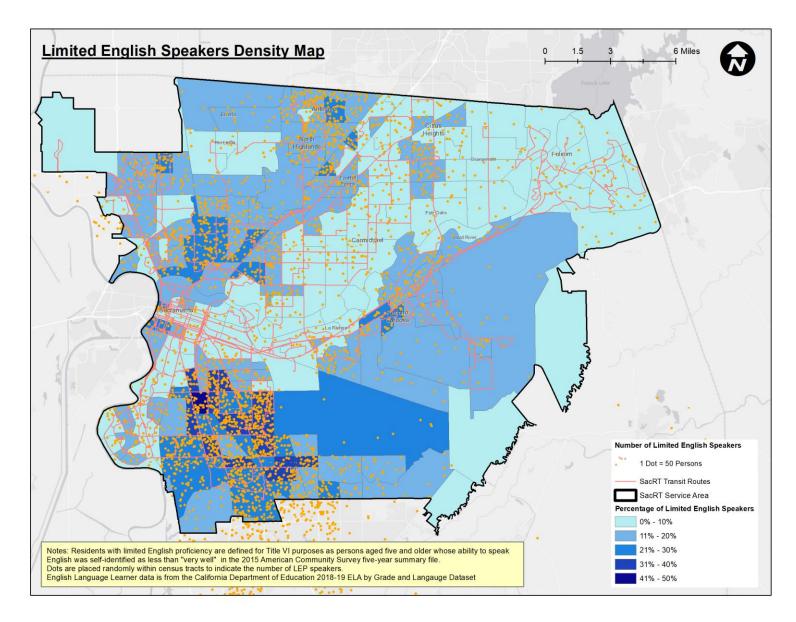


Figure 1. Limited English Speakers Density Map

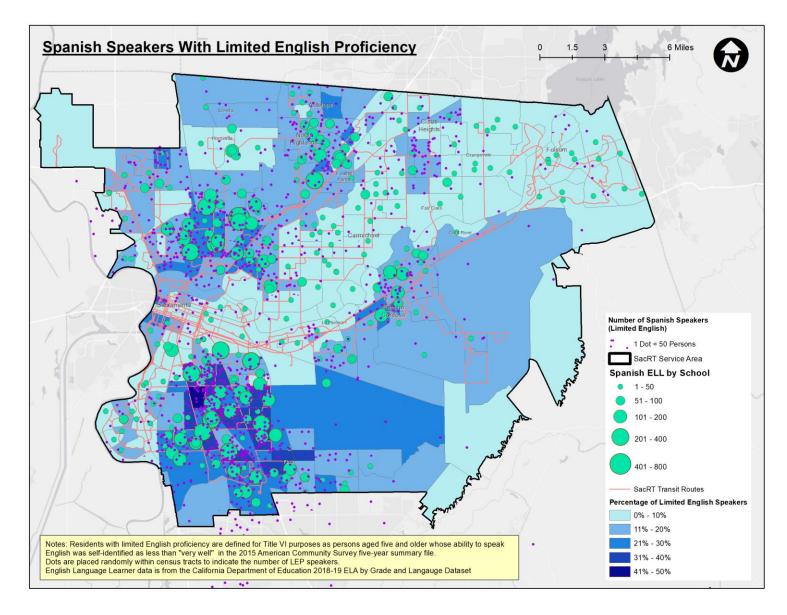


Figure 2. Spanish Speakers with Limited English Proficiency

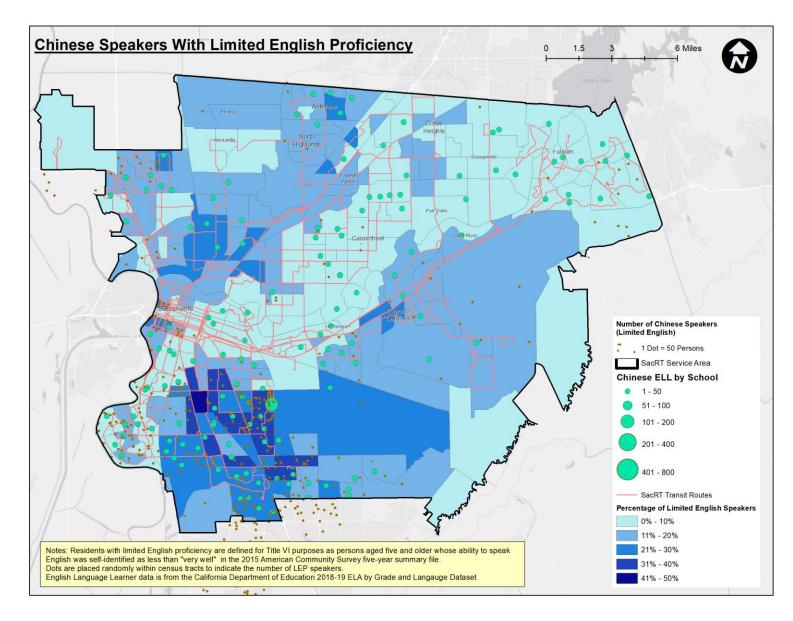


Figure 3. Chinese Speakers with Limited English Proficiency

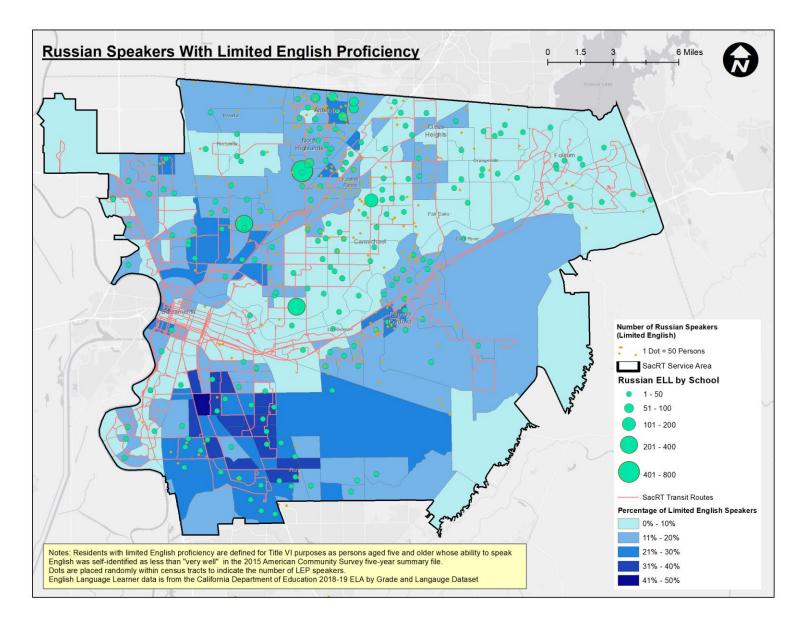


Figure 4. Russian Speakers with Limited English Proficiency

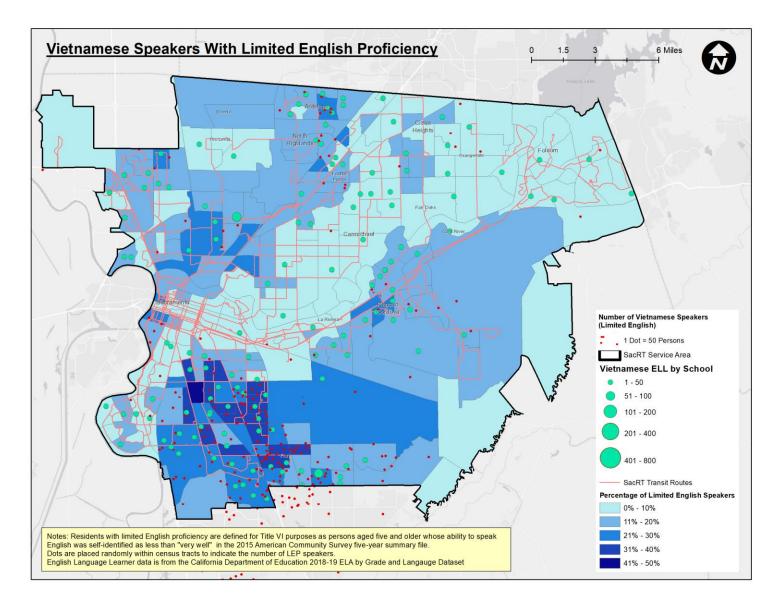


Figure 5. Vietnamese Speakers with Limited English Proficiency

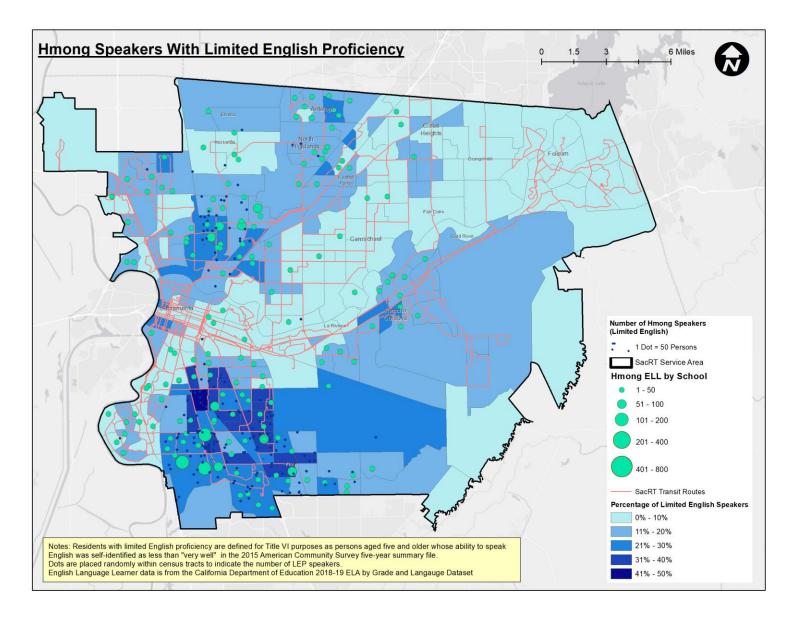


Figure 6. Hmong Speakers with Limited English Proficiency

## FACTOR 2:

The frequency with which LEP persons come in contact with SacRT programs, activities or services.

SacRT has utilized the following data sources to obtain information in determining the frequency in which LEP persons come in contact with SacRT programs, activities, and services, and the importance to LEP persons of SacRT's program, activities, and services:

- SacRT On-Board Survey data
- SacRT Operator Survey data
- SacRT Customer Service Representative Survey data
- Language Interpretation Service Statistics
- Community organizations serving LEP constituents

## SacRT On-Board Survey data

The on-board survey was suspended due to COVID-19 concerns. This section will be updated once the survey is able to be completed.

## SacRT Operator Survey data

To obtain information about SacRT's LEP passengers, staff provided an optional survey for operators in March 2020. The survey was designed to collect information pertaining to SacRT's LEP passengers directly from the first point of contact. Seventy-Six percent of operators reported having contact with LEP individuals daily with the most common languages being Spanish, Russian, Arabic and Chinese. Approximately half of the operators reported that it is difficult to communicate with LEP passengers, while the other half indicated that it was easy. On a scale of 1 to 10, with 1 being not difficult at all and 10 being very difficult, operators showed an average score of 5.75 in the difficulty of communicating with LEP passengers compared to other issues they face.

According to the survey, the most common questions asked by LEP individuals are regarding how to get to a location, which stop corresponds to their destination, and fares. Operators communicate in various ways with these individuals depending on the question asked. For questions regarding fares they point to the fare signage; maps and diagrams are used to show them how to get to their location; and operators alert LEP passengers when they arrive at their desired stop. Sixty-two percent of operators did indicate that they ask other passengers on board to help translate when possible.

The top five routes reported by SacRT bus operators that serve a large number of LEP passengers include:

- Route 23 El Camino
- Route 25 Marconi
- Route 51 Stockton/Broadway
- Routes 67/68 Franklin/44th Street/MLK
- Route 81 Florin/65th Street

## SacRT Customer Service Representative Survey data

In addition to SacRT operator feedback, the SacRT Customer Service Representatives (CSRs) were also provided with an optional survey about the importance of SacRT's programs, activities and services to LEP persons.

Approximately 60% of the CSRs have at least daily contact with a LEP passenger. During these telephone contacts, the most common languages they are asked to have translated include Russian, Spanish and Hindi.

## Language Interpretation Service Statistics

When translation is requested through the call-center, SacRT's CSRs utilize a third-party telephone interpretation service called TeleLanguage. Through this service, the CSR's are able to provide route, fare, and schedule information to LEP callers, as well as assist them in booking rides for SmaRT Ride (the on-demand curb-to-curb shuttle service). In addition to TeleLanguage there are CSRs who are fluent in Spanish

Between January 2017 and December 2019, the CSR's have taken 482 calls, a 62% increase from the previous three-year period, using the TeleLanguage phone service. This includes 8 new languages that were requested, and four that were requested previously but not during this period. The following information is a breakdown of the total number of calls by language:

Language	TeleLanguage Usage	Change from Previous Plan
SPANISH	451	+156
CANTONESE	78	+45
RUSSIAN	58	+7
MANDARIN	46	-4
VIETNAMESE	42	+19
ARABIC	20	+7
FARSI	4	-1
KOREAN	4	+1
DARI	3	+2
CHINESE TOISANESE	2	+2
LAO	2	-1
PORTUGUESE	2	-1
ALBANIAN	1	+1
ARMENIAN	1	+1
CAMBODIAN	1	+1
HINDI	1	+1
HMONG	1	0
ILOCANO (Filipino)	1	+1
POLISH	1	+1
UKRANIAN	1	+1
URDU	1	0

### Table 4. Language Line Use by Language

When translation is requested in advance (72 hours or more) of an in-person outreach event, SacRT utilize a third-party translator through their business contract with Carmazzi.

## FACTOR 3:

## The importance to LEP Persons of SacRT's program, activities and services

In order to understand the importance of SacRT's programs, activities, and services, nine telephone interviews were conducted in March 2020 with members of community organizations that serve LEP constituents. To supplement the interviews, a questionnaire was sent out to 24 additional community groups serving LEP individuals, and two responses were received. The agencies that were contacted and/or participated provide services including, but not limited to, translation and interpretation services, immigration services, refugee resettlement, foreign-language media, adult English as a second language classes, etc.

Interviewees and those filling out the questionnaire were asked about the LEP populations they serve, including languages spoken; trends in age, education, and economic status; areas of familiarity; popular destinations and neighborhoods; as well as where the demand for public transit services exists. Participating agencies include:

## Opening Doors, Inc.:

Opening Doors provides refugee resettlement, immigration legal services, support for survivors of human trafficking, English language development, and economic development services to the Spanish, Tagalog, Mandarin, Urdu, Pashto and Darispeaking communities of Sacramento.

## Slavic Assistance Center:

The Slavic Assistance Center serves the Russian and Ukrainian-speaking communities. They help with social services and communicate to their members via a newsletter, social media, online collaboration and productivity platforms, and networking events.

## Slavic Community Center of Sacramento:

Slavic social services and cultural orientation by providing Russian and Ukrainian individuals information on education options; immigration services; document preparation; financial and educational assistance and support; citizenship classes and applications; and translation and interpretation services.

## La Familia Counseling Center (LFCC):

LFCC has served the Sacramento Spanish speaking community for over 47 years and has extensive experience connecting with unserved and underserved populations. They have established themselves as a trusted community partner by providing free high-quality services in five key areas: Education and Youth development, Early Childhood Family Support, Behavioral Health, Health Navigation Services and Employment Services

### Organization 1:

Organization 1 serves the Arabic, Cantonese, Mandarin, Russian, Spanish, Vietnamese, Pashto, Turkish, Farsi, and Urdu speaking communities. They help with education and English learning and communicate to their members via social media and in-person small group tutoring.

### Southeast Asian Assistance Center (SAAC):

SAAC is a non-profit that provides interpretive services to different county social assistance agencies and other agencies that have a need for these services. They currently serve the Vietnamese, Hmong, Spanish, Chinese dialects (Cantonese, Mandarin), Russian, Punjabi, Hindi, Urdu, Mien, Pashto, Dari, and Farsi speaking communities.

### California Hispanic Resource Council (CHRC):

CHRC provides consumer fraud awareness programs, immigration and naturalization assistance, as well as referrals to other organizations or governmental agencies. CHRC mostly serves the Spanish-speaking community.

### Crossings TV:

Provides locally-oriented, produced and marketed multi-cultural programming and content in Hmong, Mandarin, Cantonese, Vietnamese, Tagalog, Japanese, Hindi, Punjabi, and Russian efficiently linking its targeted audiences and commercial, non-commercial and governmental entities.

### Asian Resources Inc. (ARI):

ARI services include ESL classes, financial literary/education, career readiness workshops, youth programs, senior social programs, VITA tax, citizenship classes, expungement clinics, job placement, enrollment into CalFresh, Medical and Covered CA, and translation/interpretation services. ARI services a variety of language communities including Chinese, Vietnamese, Hmong, Mien, Laos, Thai, Tagalog, Spanish, Urdu, Hindi, Panjabi, Russian, Dari, Farsi, Pashto, Turkish, and Ukrainian

## Afisha Media Group:

Afisha Media Group is the leading trusted source of information for the Russian and Ukrainian immigrant community. They publish Afisha Magazine, Diaspora Newspaper, and run the Radio Ethno.fm (87.7) 24hr. radio station that shares news and government announcements.

### Arab Community Center for Integration Services (ACCIS):

Formally a project under One World for Love and Peace, ACCIS provides referral services to newly arrived Arab immigrants and refugees as well as youth and women community programs to the Arabic-speaking community.

From these interviews and surveys, staff was able to identify specific communities of the service area and match them to bus routes and rail stations to provide more focused outreach when and

where it is needed. The interview results demonstrate how SacRT can customize the assistance approach for each LEP group by having identified the LEP groups and how frequently they come in contact with SacRT programs, activities, and/or services. Table 5 provides a summary for each organization contacted, the languages they serve, LEP populations, transit usage and the best way to communicate with LEP populations. Table 6 is a summary by language group outlining where these population groups live and the best way to communicate.

#### Table 5. Outreach Summary

Organization	Languages Served	English Proficiency	Where LEP Groups Live	SacRT Usage	Best ways to communicate
Opening Doors	Spanish, Tagalog, Mandarin, Urdu, Pashto and Dari	40-50% of clients have poor English language skills	Oak Park, Elk Grove, Rancho Cordova, Carmichael and Arden-Arcade.	25% use transit frequently. Due to rising rent prices, many are moving further away where the rent is more affordable. This contributes to longer transit commutes and more frequent bus transfers, which are often confusing and scary for LEP people. As a result, more people, are likely to rideshare. There is also limited familiarity with bus schedules and fares, not being able to purchase daily passes at a greater number of locations can be a barrier for people who are not likely to ride transit often.	Paper materials available, verbal announcements
Crossings TV	Hmong, Mandarin, Cantonese, Vietnamese, Tagalog, Japanese, Hindi, Punjabi, and Russian	Unknown	Little Saigon, Elk Grove	Unknown	CBO outreach, community festivals and events

Organization	Languages Served	English Proficiency	Where LEP Groups Live	SacRT Usage	Best ways to communicate
Southeast Asian Assistance Center	Vietnamese, Hmong, Spanish, Chinese dialects (Cantonese, Mandarin), Russian, Punjabi, Hindi, Urdu, Mien, Pashto, Dari, and Farsi	90-95% of clients have poor English language skills	Unknown	Unknown	Unknown
Asian Resources Inc	Chinese, Vietnamese, Hmong, Mien, Laos, Thai, Tagalog, Spanish, Urdu, Hindi, Panjabi, Russian, Dari, Farsi, Pashto, Turkish, Ukrainian	65% rely on ARI for language assistance	South Sacramento, Citrus Heights, Arden Arcade and Oak Park	40% of ARI's clients use transit frequently. ARI has SacRT route and schedule information on their community wall for members to use, and estimates that 20 members use these materials per week.	Educating them in- language about the benefits of public transit, how easy it is to use and demonstrating how to use it, and discounted pricing.

Organization	Languages Served	English Proficiency	Where LEP Groups Live	SacRT Usage	Best ways to communicate
California Hispanic Resource Council	Spanish	30% of clients having poor English language skills.	Natomas, South Sacramento, North Sacramento, and North Highlands	Roughly 5-10% of these clients tend to ride transit frequently. This is because routes are limited, stops are often far from the clients' final destination, and wait times, especially for the bus, are very long. Unfamiliarity with the SacRT system also plays a determining role. As a result, many folks would rather walk, bike, or get a ride from someone that they know.	Spanish-speaking staff or volunteers, and through word of mouth
La Familia Counseling Center	Spanish	70% of community members are not fluent in English	South Sacramento, Galt, Citrus Heights and North Sacramento	Unknown	Bilingual flyers and video explanations offered in peoples' native languages. Cultural/language- specific tv and radio station announcements are also effective.
Afisha Media Group	Russian and Ukrainian	Unknown	West Sacramento, Rancho Cordova, Carmichael, and Citrus Heights	1-2%, Most simply do not understand how the system works and are not sure where to go to get the right information.	Facebook, community events

Organization	Languages Served	English Proficiency	Where LEP Groups Live	SacRT Usage	Best ways to communicate
Arab Community Center for Integration Services	Arabic	60% of members have poor English language ability	Fulton Avenue, the area near American River College (particularly the apartment complexes on Myrtle Avenue), and Natomas	30% of ACCIS members use transit frequently, but over the last 3 years, most members have focused on car ownership since many have a difficult time accessing the right information and understanding the routes.	In-person informational sessions, community events, flyers, Facebook posts, distributing through school, and individual texts
Slavic Community Center of Sacramento	Russian	70% of clients have poor English language skills	Throughout the Sacramento area	Less than 1% of clients use transit.	Russian radio, booklets and other print materials, information in the Diaspora newspaper, and postings to their website and social media account
Slavic Assistance Center	Russian and Ukrainian	50% of their members have a limited understanding of English	Unknown	50% of the organization's members use transit, and the biggest barrier to transit is difficulty understanding the system.	Newsletter, social media, online collaboration and productivity platforms, and networking events
Organization 1	Arabic, Cantonese, Mandarin, Russian, Spanish, Vietnamese, Pashto, Turkish, Farsi, and Urdu	50% of their members have a limited understanding of English	Unknown	25% of the organization's members use transit frequently, and most of them are elementary school students who are too young to make their own transportation decisions.	One-on-one communication

#### Table 6. LEP Summary by Language

Language	Where Individuals Reside	Best Ways to Communicate
Spanish	Natomas, South Sacramento, North Sacramento, Citrus Heights, Oak Park, Galt, Elk Grove, Rancho Cordova, Carmichael, Arden-Arcade and North Highlands	In-person (one-on-one), word-of-mouth, flyers, videos/TV, Radio
Russian	West Sacramento, Rancho Cordova, Carmichael, and Citrus Heights	Organization newsletters, social media, radio, In- person (one-on-one), TV, and community events
Vietnamese	Little Saigon (i.e., Stockton Blvd, between Fruitridge and Florin)	In-person (one-on-one), TV, Community Events
Chinese	Citrus Heights, South Sacramento, Oak Park, Rancho Cordova, Carmichael and Arden- Arcade	
Arabic	Fulton Ave, Myrtle Ave, Natomas	In-person (one-on-one), community events, flyers, social media, through the school system, texting

### FACTOR 4:

Evaluate the resources available to SacRT and overall cost to provide LEP assistance.

SacRT's Fiscal Year 2019 operating budget totals \$169 million. SacRT's total budget for Marketing and Communications was \$1 million, including labor, materials, and expenses. Language assistance impacts SacRT's budget in the following ways:

- Costs of translation into six languages
- Costs for live telephone interpretation services
- Costs for interpreters at Board meetings and hearings, when requested
- Additional printing costs for key documents
- Additional administrative and training costs
- Additional costs for outreach labor and materials for potentially impactful construction projects in LEP areas

Direct costs for written translation, telephone interpretation, and in-person interpretation for public meetings total \$4,000 between fiscal year 2017 and 2019. Since 2017, SacRT staff has been providing key documents for customers in English and six additional languages:

- Spanish
- Chinese
- Vietnamese
- Russian
- Hmong
- Punjabi

### Implementation Plan for Language Assistance

This section describes SacRT's current and future plans for providing language assistance to LEP persons.

#### Identifying LEP Persons Who Need Language Assistance

"Agencies would be well advised to ask LEP persons whether they are aware of the types of language assistance the agency provides, which of these forms are most beneficial, and what, if any, additional language assistance measures would be most beneficial." (DOT LEP Guidance Section V(4)).

The Four Factor analysis showed that there is frequent contact between LEP individuals and SacRT personnel. Language line calls, outreach interviews, the customer survey, and the employee survey all show a high degree of contact between persons with limited English proficiency and SacRT. Based on the feedback received throughout the extensive outreach and research effort conducted as part of this update, it is clear that LEP customers are able to get information about SacRT services and programs and that language barriers are not strong inhibitors to accessing services. To ensure that LEP customers can continue to get information

on SacRT services and programs, SacRT will continue to undertake the current translation activities and begin using a tiered approach (commonly used by other large systems such as BART) to determine thresholds for language translation. At each Title VI Program Update, SacRT will reevaluate thresholds based on its LEP tracking data so that it corresponds to the language groups frequently encountered within the tiered approach. In addition to language translations, SacRT will continue to use pictograms on all wayfinding signage.

### Providing Language Assistance

This section describes the current and future services that SacRT provides for enhancing the access of its system to LEP persons.

#### Existing LEP Programs and Services

The following is a summary of the language assistance, programs, and services currently provided in addition to the bilingual customer service staff and operators. Several of the documents have a statement on how to obtain information printed in each language stating, "For route, schedule and fare information, call 916-321-BUSS (2877)." For document examples please see the Appendix A to the Title VI Program Update.

,	
Document/Program	Current Translation
TeleLanguage	Over 20 languages
Public Hearing Notices	Spanish, Russian, Chinese, Hmong,
	Vietnamese and Punjabi
Title VI Notice on Bus, Light Rail, SmaRT Ride, and Paratransit Vehicles	Spanish, Russian, Chinese, Hmong, Vietnamese and Punjabi
Title VI Notice on Web Site	Spanish, Russian, Chinese, Hmong, and Vietnamese
Title VI Complaint Form on Web Site	Spanish, Russian, Chinese, Hmong, Vietnamese, and Punjabi
Public Notices Regarding Fare Change Proposals	Spanish, Russian, Chinese, Hmong, Vietnamese, and Punjabi
Public Notices Regarding Service Change Proposals	Spanish, Russian, Chinese, Hmong, Vietnamese, and Punjabi
Passenger Origin/Destination and Demographic Surveys	Spanish, Russian, Chinese, Hmong, Vietnamese, and Punjabi
Public notice regarding upcoming service change	Spanish, Russian, Chinese, Hmong, Vietnamese and Punjabi
Potentially impactful construction project information	Varies based on LEP population in vicinity
Printed Pocket Timetables with statement on how to obtain information	Spanish, Russian, Chinese, Hmong, Vietnamese, and Punjabi.
How to Ride Guide with statement on how to obtain information	Spanish, Russian, Chinese, Hmong, Vietnamese, and Punjabi
Station Wayfinding	Pictograms and Braille
Ticket Vending Machine Menus	Spanish
SacRT Web Site	Google Translation available in over 100 languages

Table 7. Existing/Prior Translation as Documented in the 2017 LAP Update

Document/Program	Current Translation
Connect Card Web Site	Google Translation available in over 100 languages
Connect Card Brochure	Spanish
Safety Campaign	Varies based on LEP population in vicinity
Promotional Campaigns	Spanish and additional languages based on LEP population in vicinity of service being promoted
Neighborhood Targeted TV Commercial	Varies based on LEP population in vicinity
Community Partnerships	City Year, Crossing TV, Russian American Media Group, Asian Resources, Latino Roundtable, Sacramento Asian Chamber, Sacramento Hispanic Chamber

SacRT uses the partnerships with LEP organizations as a network to send out toolkits with user information, and disseminate information at the organizations' locations and through social media. Recently, SacRT has worked with Spanish language TV and radio broadcast organizations to create commercials promoting new routes and services.

In accordance with the tiered process for document translation, SacRT will make the following changes as outlined below. The tiered approach changes current practices so that Tier 2 documents will now be translated into Arabic and no longer translated into Punjabi. Tier 3 documents (Vital Documents) will now be translated into nine additional languages.

#### Tier 1- Limited Communications Media

Tier 1 languages include all languages that meet one of the follow criteria: 1) More than 5% of the total population identified in the census as not speaking English well; 2) Contains at least 25% of ELL students. The narrow selection of languages in this tier recognizes limitations inherent in the communications media used, such as space constraints. The only Tier 1 Language is Spanish. The following documents are Tier 1 documents:

- Fare information decal on bus farebox
- Ticket vending machine
- Connect Card brochure
- Promotional campaigns

#### Tier 2 – Title VI Activities and Outreach

Tier 2 languages include tier 1 languages, plus any additional language that utilizes the TeleLanguage service at least once a month or has been identified through the customer survey or staff surveys as having frequent contact. The translation criteria for this tier recognizes constraints in agency resources for extensive translation. Tier 2 languages are Spanish, Arabic, Chinese, Vietnamese, Russian, and Hmong. The following documents are Tier 2 documents:

- Public hearing notices
- Public notices regarding fare change proposals
- Public notices regarding service change proposals
- Passenger origin/destination and demographic surveys
- Printed pocket timetables
- How to Ride Guide
- Neighborhood targeted TV commercial

#### Tier 3 – Vital Documents

Tier 3 includes all 14 specific Safe Harbor Languages listed in Table 2. Tier 3 languages are Spanish, Arabic, Chinese, Vietnamese, Russian, Hmong, Tagalog, Hindi, Korean, Persian, Laotian, Japanese, Armenian, and Mon-Khmer. The following documents are Tier 3 documents:

- Title VI Notice on Bus, Light Rail, SmaRT Ride, and Paratransit Vehicles
- Title VI Notice on Website
- Title VI Complaint Form on Website

#### Tier 3 – Targeted

On a case-by-case basis for construction projects and route-specific changes, SacRT, at its discretion, will translate documents into additional languages if the nature of the document and the character of the document's target audience justify additional translation. Additional languages will be determined by the frequency of encounters with language groups. If SacRT lacks data on encounters, additional languages may be determined by demographic data and USDOT guidelines on language translation. The following documents are Tier 3 targeted documents:

- Potentially impactful construction project information
- Safety campaigns
- Promotional campaigns
- "We Speak Your Language" stickers

#### Tier 4 – Technology-Dependent

In many cases, technology has allowed for affordable, easy translation into multiple languages. In these instances, SacRT will continue to use these services for translation as allowed by the technology. Changes in the affordability, ease, or availability of the technology could result in a change in translation activities. The documents/programs are as follows:

- TeleLanguage Service
- Connect Card Website
- SacRT Website

To better serve the LEP populations, SacRT will seek to work with mobile app developers who can support multi-lingual phone apps. To assist operators with LEP customers, "We Speak Your Language" stickers will be developed and place on board each vehicle. Drivers will be instructed

to point to the sticker to communicate with LEP passengers. The sticker will have instructions in all safe harbor languages on how to obtain route, schedule and fare information. Effective immediately public notices regarding pending major route closures (over 200 boardings per day) will be translated into the languages of LEP population groups in the vicinity of the closure.

### Training Staff

SacRT's existing staff training for better serving LEP transit customers includes:

- For the Transit Ambassador (ticket inspectors) training, SacRT trains employees to deal with hearing-impaired passengers with pen and paper. For LEP passengers, SacRT communicates via a translation app on district-issued smartphones. All new Ambassadors have 40 hours of classroom training where they learn about managing difficult/uncooperative passengers and LEP passengers. They also have 80 hours of in-the-field training where they apply the techniques learned in the classroom.
- New bus operators undergo 48 hours of classroom training and 20 hours of behind-the-wheel training, during which time, as part of their overall customer service curriculum, they are instructed on language assistance, customers with disabilities, sensitivity training, etc. If an operator encounters a customer with Limited English Proficiency (LEP) experiencing difficulty using the system, they are trained to use common-sense methods to assist the customer and to look for visual cues that might indicate the nature of the question, especially if it is regarding frequent topics of confusion. (Ex: A customer gesturing toward his/her wallet is likely confused about the fare. Hesitancy to board the bus in the first place may indicate uncertainty regarding the bus's destination and/or stops.) Practical measures are encouraged, including enlisting the assistance of other passengers who may speak the same language, referring to printed information on the fare structure displayed on the farebox, stating some of the key streets or destinations that the bus will serve (e.g., "Arden Mall"), or giving the customer the number for Customer Service, which can render assistance in any language.
- Current bus operators are instructed in an ongoing basis in "Passenger Assistance Trainings" with techniques that cover various communications strategies, such as hand signals. Many drivers are bilingual and able to communicate with LEP passengers. There are also multilingual staff available to assist drivers during business hours, and all drivers are instructed to call into dispatch if additional assistance is needed.
- Newly hired Customer Service Representatives go through a minimum of two weeks of training in the Customer Service Center. Over the course of their training, they meet with Supervisors/Managers for an overview and basic training on systems, procedures, and customer service expectations. During this time, they learn where to locate the number for our language interpretation service, how to access it, and which codes to use when prompted. Additionally, much of their training consists of observations and hands-on experience with SacRT current staff at their desks in the Call Center or at the registers in the Sales Center. During this side-by-side training and mentoring, new hires are able to see how interpretation calls are handled first-hand before they try them on their own.
- Newly hired van drivers go through "Passenger Assistance Training" where they are trained in techniques to communicate with individuals who do not speak English, as well as those with speech impediments, hearing- or visually-impaired, lip readers, developmentally

disabled, or epileptic. Throughout the course of the training drivers receive hands-on training with passengers covering a variety of scenarios. Correct visual leads or hand gestures (pointing for a direction, use of the stairs, use of the lift, how are you paying) are often used in training and many are universal for any language. All drivers are trained to call into dispatch if they need additional assistance where there is staff on call 7 days a week.

### Providing Notice to LEP Persons

USDOT LEP guidance states: "Once an agency has decided, based on the four factors, that it will provide language service, it is important that the recipient notify LEP persons of services available free of charge. Recipients should provide this notice in languages LEP persons can understand."

SacRT currently provides notification through the public using the methods outlined in the Public Participation Plan.

### Monitoring and Updating the LEP Plan

SacRT has designated the Marketing Department to provide oversight and coordination of the implementation of this Language Assistance Plan. The Marketing Department fulfills most of the duties specified in the LAP, with the Customer Satisfaction Department and Operations also playing key roles. The Planning Department coordinates SacRT's triennial program updates, including demographic analysis and stakeholder interviews. Every three years, SacRT will review the effectiveness of the LAP using strategies that may include, but are not limited to the following:

- Solicit direct feedback from community organizations by distributing a questionnaire or holding focus group sessions on communicating with LEP individuals;
- Assess the demographic composition of Sacramento County using the most current census and California Department of Education data, and regularly update;
- Conduct internal monitoring and random spot checks of LEP services;
- Measure the actual frequency of contact by LEP persons by collecting information from TeleLanguage usage, CSR interviews, and operator surveys.

Appendix E

**Construction Projects** 

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Construction Projects Updated April 1, 2020

There were no construction projects requiring a Title VI Equity Analysis during the three-year period of this Program.

Appendix F

**Customer Demographics** 

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**Customer Demographics** 

Updated April 1, 2020

Due to the outbreak of Covid-19, customer surveying was halted until such time as it is safe to resume. An amended version of this Program will be submitted after surveying is completed and the analysis undertaken.



# Title VI Service Monitoring Report

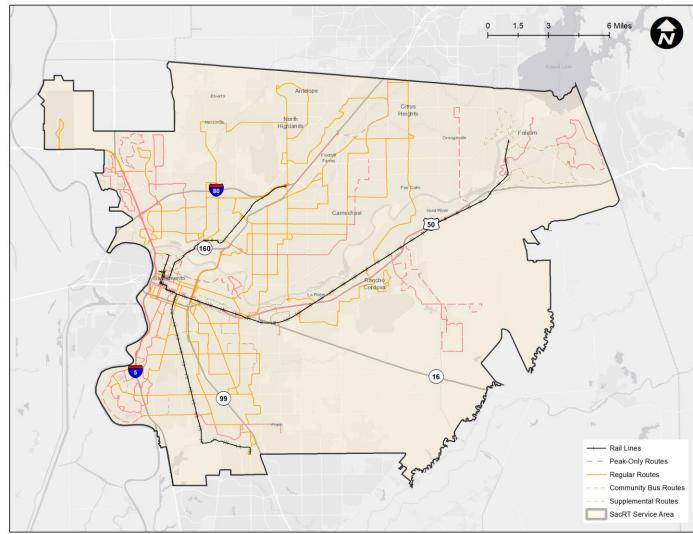
April 1, 2020

# **Purpose and Requirements**

- Required once every three years by FTA as part of SacRT's Title VI Civil Rights Program
- SacRT must evaluate all fixed-route modes against six mandatory service standards
- Analysis identifies potential disparate impacts to minority populations or low-income populations
- SacRT must choose a representative sample of routes<sup>1</sup>
- SacRT's Service Standards recommend including all routes, except for contract service, supplemental service, special event service, demonstration projects, etc.
- SacRT Board is required to review and approve findings
- If disparate impacts exist, SacRT is required to take corrective action to remedy the disparities to the greatest extent possible

# **Summary of 2020 Standards Evaluation**

Standards	Evaluation
Vehicle Loading	No disparate impacts
Service Headway/ Productivity	No disparate impacts
On-Time Performance	Potential disparities between low-income and non low-income routes for Saturday and Sunday services
Service Availability	No disparate impacts
Amenity Distribution	No disparate impacts
Vehicle Assignment	No disparate impacts



## Service Area Map

- Service Area: 397 sq mi
- Transit Routes: 65 bus routes & 3 rail lines

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- 28 Regular bus routes
- 20 Peak-only routes
- 2 Community bus routes
  - 15 Supplemental routes
- Population: 1,270,719

Source: January SacRT 2020 GTFS, ACS 2017 Five-Year Estimates

# **Major Destinations**

### **Hospitals:**

- 1. Mercy San Juan Hospital
- 2. Methodist Hospital of Sacramento
- 3. Mercy General Hospital
- 4. Sutter General Hospital
- 5. UC Davis Medical Center
- 6. Sacramento VA Medical Center VA Northern California Health Care System
- 7. Kaiser Permanente Rancho Cordova Medical Offices
- 8. Kaiser Permanente Sacramento Medical Center and Medical Offices
- 9. Kaiser Permanente Point West Medical Offices
- 10.Kaiser Permanente South Sacramento Medical Center

### **University and Colleges:**

- 1. California State University, Sacramento
- 2. UC Davis
- 3. University of San Francisco Sacramento Campus
- 4. American River College
- 5. American River College Natomas
- 6. Cosumnes River College
- 7. Sacramento City College

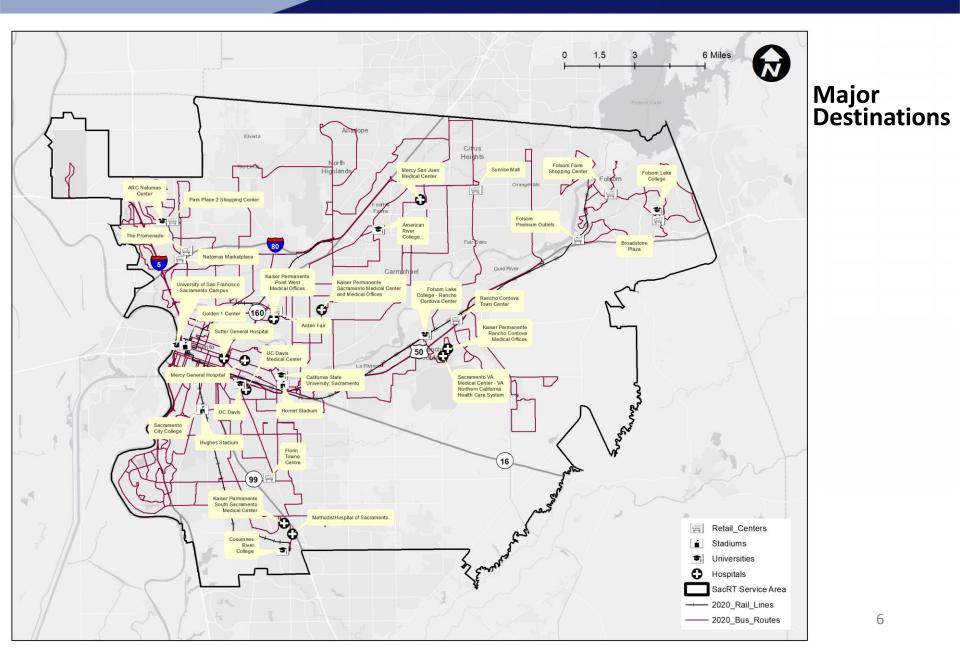
- 8. Folsom Lake College
- 9. Folsom Lake College Rancho Cordova Center

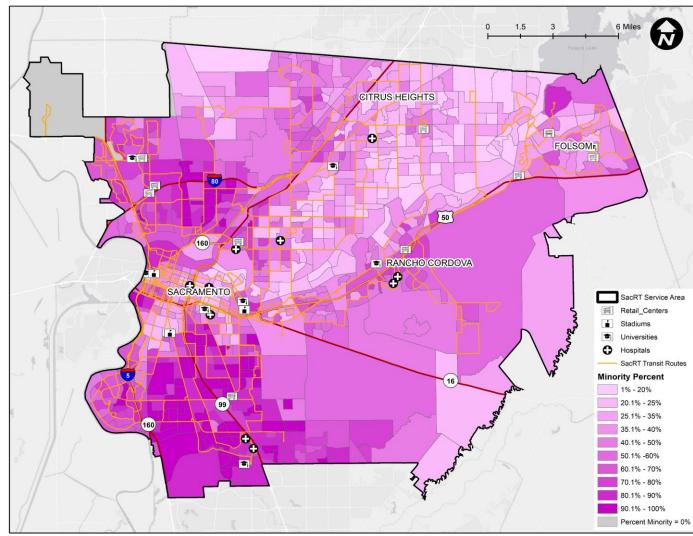
### Arena and Stadiums:

- 1. Hughes Stadium
- 2. Hornet Stadium
- 3. Beaver Stadium

### **Shopping Malls and Centers:**

- 1. The Promenade
- 2. Sunrise Mall (Marketplace At Birdcage)
- 3. Park Place 2 Shopping Center
- 4. Arden Fair
- 5. Florin Towne Center
- 6. Rancho Cordova Town Center (Zinfandel Plaza)
- 7. Broadstone Plaza
- 8. Palladio Parkway & Broadstone Pointe
- 9. Natomas Marketplace
- **10.Folsom Premium Outlets**
- 11. Folsom Faire Shopping Center

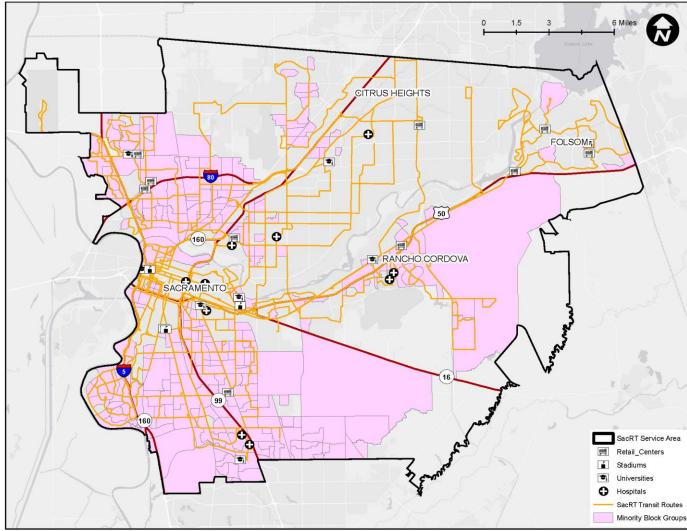




## Percent Minority Map

- Service Area: 397 sq mi
- Population: 1,270,719
- Minority Population: 678,827

Source: January SacRT 2020 GTFS, ACS 2017 Five-Year Estimates



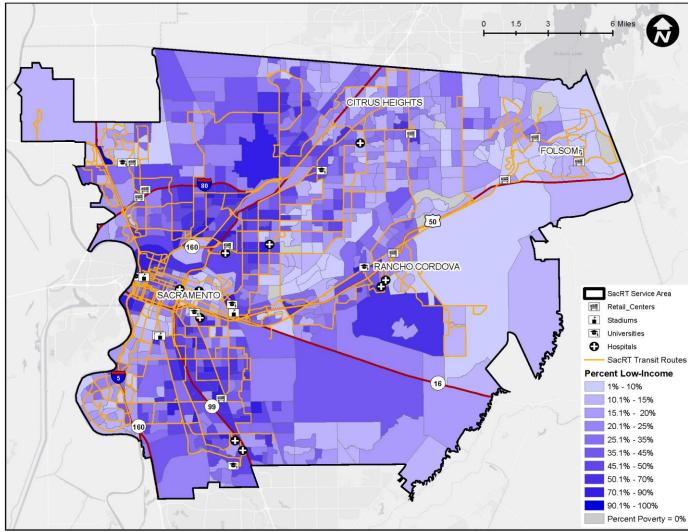
## **Minority Area Map**

- Service Area: 397 sq mi
- Population: 1,270,719
- Minority Population: 678,827

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Minority Block Groups are defined as block groups that exceed 53.4% minority population which is the service area's average

Source: January SacRT 2020 GTFS, ACS 2017 Five-Year Estimates



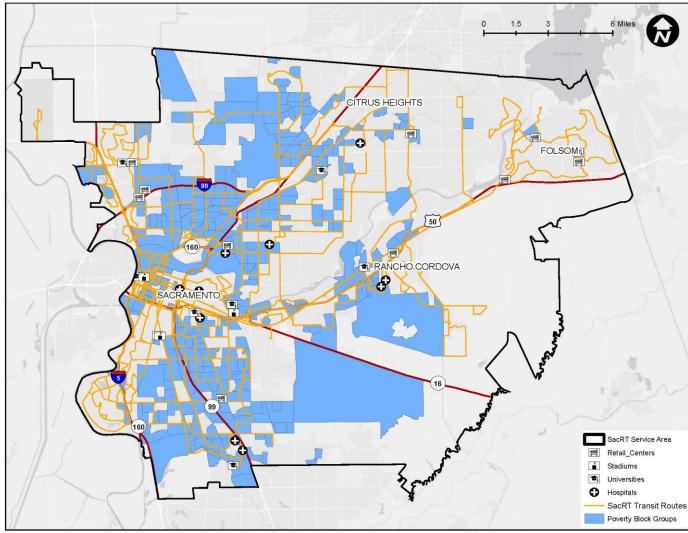
## Percent Low-income Map

- Service Area: 397 sq mi
- Population: 1,252,965<sup>1</sup>
- Low-income Population: 353,591

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1) Total population counts for Minority and Low-Income slightly different due to 2017 ACS Five-Year tables used.

Source: January SacRT 2020 GTFS, ACS 2017 Five-Year Estimates



## Low-income Area Map

- Service Area: 397 sq mi
- Population: 1,252,965<sup>1</sup>
- Low-income Population: 353,591
- Low-income Block Groups are defined as block groups that exceed 28.2% lowincome, which is the service area's average

1) Total population counts for Minority and Low-Income slightly different due to 2017 ACS Five-Year tables used.

Source: January SacRT 2020 GTFS, ACS 2017 Five-Year Estimates



# **Definitions**

- FTA's service monitoring process focuses on "minority routes"
- 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
- FTA defines a minority area as a block group where the percent of minority residents exceeds the average for local transit agency's (SacRT's) service area
- FTA defines a "minority route" as a route where more than 1/3 of the route's miles go through a minority area. 43 of 65 SacRT bus routes are minority routes
- SacRT voluntarily follows same process for low-income routes. 48 of 65 SacRT bus routes are low-income routes
- 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
- A statistically significant disparate impact is determined if a deficiency exceeds 15 percentage points, as defined in the SacRT Service Change Policy

Route	Name	Minority	Low- Income	Route	Name	Minority	Low- Income
1	GREENBACK	No	Yes	113	NORTH MARKET COMMUTER	Yes	Yes
11	NATOMAS/LAND PARK	Yes	Yes	129	ARDEN COMMUTER	No	Yes
13	NATOMAS/ARDEN	Yes	Yes	134	MCKINLEY COMMUTER	No	No
15	DEL PASO HEIGHTS	Yes	Yes	142	INTERNATIONAL	Yes	No
19	RIO LINDA	Yes	Yes	161	BELVEDERE	No	No
21	SUNRISE	No	No	170	JIBE EASTSIDE	Yes	Yes
23	EL CAMINO	No	Yes	171	JIBE WESTSIDE	Yes	Yes
25	MARCONI	No	Yes	172	JIBE CENTRAL	Yes	No
26	FULTON	No	Yes	174	JIBE SOUTHWEST	Yes	Yes
30	J STREET	No	Yes	175	CORDOVAN - ANATOLIA-SUNRIDGE	Yes	No
33	DOS RIOS	Yes	Yes	176	CORDOVAN - ANATOLIA-KAVALA RANCH	Yes	No
38	TAHOE PARK	No	Yes	177	CORDOVAN - VILLAGES	Yes	No
51	STOCKTON/BROADWAY	Yes	Yes	193	AUBURN COMMUTER	No	No
51X	W/X	Yes	Yes	205	FRUITRIDGE RD - FREEPORT BLVD	Yes	Yes
56	MEADOWVIEW	Yes	Yes	206	12TH AVE - SUTTERVILLE RD	Yes	Yes
61	FRUITRIDGE	Yes	Yes	210	LA RIVIERA DR	No	Yes
62	FREEPORT	Yes	No	211	COLLEGE GREENS	No	Yes
67	FRANKLIN	Yes	Yes	212	14TH AVE - 21ST AVE	No	Yes
68	OAK PARK	Yes	Yes	213	FRUITRIDGE RD - STOCKTON BLVD	Yes	Yes
72	ROSEMONT	Yes	Yes	214	BROADWAY - STOCKTON BLVD	Yes	Yes
75	MATHER	Yes	Yes	226	POCKET RD - RIVERSIDE BLVD	Yes	Yes
81	FLORIN	No	Yes	227	SOUTH LAND PARK - GREENHAVEN DR	Yes	Yes
82	NORTHROP/MORSE	No	Yes	228	GLORIA DR - RUSH RIVER DR	Yes	Yes
84	WATT	Yes	Yes	246	MEADOWVIEW - GREENHAVEN	Yes	Yes
86	GRAND	Yes	Yes	247	21ST ST - FLORIN RD	Yes	Yes
87	HOWE	Yes	Yes	248	MEADOWVIEW RD - RUSH RIVER DR	Yes	No
88	WEST EL CAMINO	Yes	Yes	252	FREEPORT - FRUITRIDGE - ML KING	Yes	Yes
93	HILLSDALE	No	Yes	255	LA RIVIERA - COLLEGE GREENS	No	Yes
102	RIVERSIDE COMMUTER	Yes	No	10F	FSL	No	No
103	RIVERSIDE EXPRESS	Yes	No	20F	FSL	No	No
105	ELSIE	Yes	Yes	30F	FSL	No	No
106	LAND PARK COMMUTER	Yes	No	Blue	MEADOWVIEW - WATT/I-80	Yes	Yes
107	SOUTH LAND PARK EXPRESS	Yes	Yes	Gold	DOWNTOWN - FOLSOM	Yes	Yes
109	HAZEL EXPRESS	No	Yes	Green	13TH - RICHARDS/TOWNSHIP 9	Yes	Yes

## Minority and Low-income Routes

- The population of SacRT's service area is
  - 53.4 percent minority
  - 28.2 percent low-income
- 43 of 65 bus routes are minority routes (66.2%)
- 48 of 65 bus routes are low-income routes (73.8%)
- All three light rail lines are lowincome routes and minority routes
- Supplemental service (200-series routes) and commuter bus service (33 and 10F) are not included in the service standards analysis

**Capacity By Vehicle Type** 

# **Vehicle Loading Standards**

 SacRT considers a route to be overloaded if 25 percent or more of one-way vehicle trips are overloaded. For example, an hourly route with 32 one-way vehicle trips per day and 8 or more trips that are over capacity is considered to exceed the standard.

Vehicle Type	Seated	Standing	Total	Load Factor
40ft Low-Floor Bus (Orion)	38	28	66	1.7
40ft Low-Floor Bus (Orion)	34	31	65	1.9
40ft Low-Floor Bus (Gillig)	34	31	65	1.9
27.5ft Cutaway Bus	22	2	24	1.1
32ft Cutaway Bus	30	2	32	1.1
Folsom 25ft Bus	12	0	12	1
Folsom 32 ft Bus	25	2	27	1.1
Light Rail	100 per light rail vehicle			

# Vehicle Loading - Weekdays (M-F)

Route	Name	Weekday Daily Trips	% Overld	Minority	Low-Income
1	GREENBACK	123	0%	No	Yes
11	NATOMAS/LAND PARK	48	0%	Yes	Yes
13	NATOMAS/ARDEN	40	0%	Yes	Yes
15	DEL PASO HEIGHTS	56	0%	Yes	Yes
19	RIO LINDA	29	0%	Yes	Yes
21	SUNRISE	66	0%	No	No
23	EL CAMINO	76	0%	No	Yes
25	MARCONI	60	0%	No	Yes
26	FULTON	63	0%	No	Yes
30	J STREET	69	0%	No	Yes
38	TAHOE PARK	59	0%	No	Yes
51	STOCKTON/BROADWAY	124	0%	Yes	Yes
56	MEADOWVIEW	66	0%	Yes	Yes
61	FRUITRIDGE	58	0%	Yes	Yes
62	FREEPORT	60	0%	Yes	No
67	FRANKLIN	66	0%	Yes	Yes
68	OAK PARK	66	0%	Yes	Yes
72	ROSEMONT	62	0%	Yes	Yes
75	MATHER	54	0%	Yes	Yes
81	FLORIN	119	0%	No	Yes
82	NORTHROP/MORSE	69	0%	No	Yes
84	WATT	62	0%	Yes	Yes
86	GRAND	65	0%	Yes	Yes
87	HOWE	61	0%	Yes	Yes
88	WEST EL CAMINO	58	0%	Yes	Yes
93	HILLSDALE	55	0%	No	Yes
142	INTERNATIONAL	64	0%	Yes	No

Source: SacRT January 2020 Note: 51X service is not included

- 27 bus routes evaluated
- Peak-Only routes evaluated separately
- All routes meet standard (if 25% or more of trips exceed capacity then the route is overloaded)
- No disparate impact

#### Assumptions

- Regular bus routes overload threshold: 66
- Cutaway routes overload threshold : 32
- Folsom's routes overload threshold : 12
- Trips without vehicle loading data were excluded

# Vehicle Loading - Saturday

Route	Name	Saturday Daily Trips	% Overld	Minority	Low-Income
1	GREENBACK	63	0%	No	Yes
11	NATOMAS/LAND PARK	35	0%	Yes	Yes
13	NATOMAS/ARDEN	37	0%	Yes	Yes
15	DEL PASO HEIGHTS	52	0%	Yes	Yes
19	RIO LINDA	24	0%	Yes	Yes
21	SUNRISE	39	0%	No	No
23	EL CAMINO	54	0%	No	Yes
25	MARCONI	36	0%	No	Yes
26	FULTON	48	0%	No	Yes
30	J STREET	30	0%	No	Yes
38	TAHOE PARK	29	0%	No	Yes
51	STOCKTON/BROADWAY	73	0%	Yes	Yes
56	MEADOWVIEW	55	0%	Yes	Yes
61	FRUITRIDGE	34	0%	Yes	Yes
62	FREEPORT	29	0%	Yes	No
67	FRANKLIN	49	0%	Yes	Yes
68	OAK PARK	51	0%	Yes	Yes
72	ROSEMONT	27	0%	Yes	Yes
75	MATHER	26	0%	Yes	Yes
81	FLORIN	60	0%	No	Yes
82	NORTHROP/MORSE	38	0%	No	Yes
84	WATT	51	0%	Yes	Yes
86	GRAND	38	0%	Yes	Yes
87	HOWE	38	0%	Yes	Yes
88	WEST EL CAMINO	40	0%	Yes	Yes
93	HILLSDALE	35	0%	No	Yes
142	INTERNATIONAL	61	0%	Yes	No

- 27 bus routes evaluated
- Peak-Only routes evaluated separately
- All routes meet standard (if 25% or more of trips exceed capacity then the route is overloaded)
- <u>No disparate impact</u>

Source: SacRT January 2020

# Vehicle Loading - Sunday

Route	Name	Sunday Daily Trips	% Overld	Minority	Low-Income
1	GREENBACK	59	0%	No	Yes
11	NATOMAS/LAND PARK	35	0%	Yes	Yes
13	NATOMAS/ARDEN	31	0%	Yes	Yes
15	DEL PASO HEIGHTS	32	0%	Yes	Yes
19	RIO LINDA	24	0%	Yes	Yes
21	SUNRISE	29	0%	No	No
23	EL CAMINO	35	0%	No	Yes
25	MARCONI	26	0%	No	Yes
26	FULTON	25	0%	No	Yes
30	J STREET	30	0%	No	Yes
38	TAHOE PARK	29	0%	No	Yes
51	STOCKTON/BROADWAY	66	0%	Yes	Yes
56	MEADOWVIEW	35	0%	Yes	Yes
61	FRUITRIDGE	32	0%	Yes	Yes
62	FREEPORT	29	0%	Yes	No
67	FRANKLIN	29	0%	Yes	Yes
68	OAK PARK	29	0%	Yes	Yes
72	ROSEMONT	26	0%	Yes	Yes
75	MATHER	26	0%	Yes	Yes
81	FLORIN	49	0%	No	Yes
82	NORTHROP/MORSE	34	0%	No	Yes
84	WATT	27	0%	Yes	Yes
86	GRAND	33	0%	Yes	Yes
87	HOWE	36	0%	Yes	Yes
88	WEST EL CAMINO	35	0%	Yes	Yes
93	HILLSDALE	26	0%	No	Yes
142	INTERNATIONAL	43	0%	Yes	No

Source: SacRT January 2020

- 27 bus routes evaluated
- Peak-Only routes evaluated separately
- All routes meet standard (if 25% or more of trips exceed capacity then the route is overloaded)
- No disparate impact

# Vehicle Loading - Peak-Only Service

Route	Name	Weekday Daily Trips	% Overld	Minority	Low-Income
102	RIVERSIDE COMMUTER	11	0%	Yes	No
103	RIVERSIDE EXPRESS	8	0%	Yes	No
105	ELSIE	2	0%	Yes	Yes
106	LAND PARK COMMUTER	5	0%	Yes	No
107	SOUTH LAND PARK EXPRESS	6	0%	Yes	Yes
109	HAZEL EXPRESS	4	0%	No	Yes
113	NORTH MARKET COMMUTER	7	0%	Yes	Yes
129	ARDEN COMMUTER	4	0%	No	Yes
134	MCKINLEY COMMUTER	7	0%	No	No
161	BELVEDERE	2	0%	No	No
171	JIBE WESTSIDE	7	0%	Yes	Yes
175	CORDOVAN - ANATOLIA-SUNRIDGE	14	0%	Yes	No
176	CORDOVAN - ANATOLIA-KAVALA RANCH	14	0%	Yes	No
177	CORDOVAN - VILLAGES	55	0%	Yes	No
193	AUBURN COMMUTER	8	0%	No	No
20F	FSL	1	0%	No	No
172	JIBE CENTRAL	8	13%	Yes	No
174	JIBE SOUTHWEST	6	17%	Yes	Yes
170	JIBE EASTSIDE	10	20%	Yes	Yes

- 19 bus routes evaluated
- All routes meet standard (if 25% or more of trips exceed capacity then the route is overloaded)
- No disparate impact

Source: SacRT January 2020

Note: 30F service is not included

# Vehicle Loading – Light Rail

Line	Service	Daily Trips	% Overld	Minority	Low-Income
Blue	Weekday	134	0%	Yes	Yes
	Saturday	230	0%	Yes	Yes
	Sunday	279	0%	Yes	Yes
Gold	Weekday	135	0%	Yes	Yes
	Saturday	230	0%	Yes	Yes
	Sunday	282	0%	Yes	Yes
Green	Weekday	60	0%	Yes	Yes

Source: SacRT January 2020

- Three light rail lines with weekday service; two with weekend service.
- All routes meet standard (if 25% or more of trips exceed capacity then the route is overloaded)
- <u>No disparate impact</u>

# **Headway/Productivity Standards**

- Light rail runs at 15- or 30-minute headways.
- Regular bus routes connecting with light rail usually run at multiples of 15-minute headways to facilitate transferring.
- Regular headways should not exceed 60-minutes on any trunk or branch line.
- Headways on Peak-Only routes are based on passenger loads and are adjusted to match school bell times, shift changes, etc., except for light rail feeders, which should be timed around the light rail schedule.
- In areas where headways are 30- to 60-minutes, parallel routes should generally be spaced approximately one mile apart and additional resources should be used to improve headways before adding new routes or branches at closer distances.
- Headways should be improved on routes exceeding the maximum productivity standard.
- Headways should be lengthened on routes below minimum productivity, but not longer than 60 minutes.

	Productivity Standards			
Service Type	Minimum		Maximum	
Regular Weekday Bus Service	20	boardings per hour	40	boardings per hour
Saturday Bus Service	15	boardings per hour	35	boardings per hour
Sunday/Holiday Bus Service	15	boardings per hour	35	boardings per hour
Commuter Bus Service	15	boardings per hour	30	boardings per hour
Peak-Only Light Rail Feeder	15	boardings per trip	34	boardings per trip
Peak-Only Downtown Express	25	boardings per trip	34	boardings per trip
Supplemental Service	25	boardings per trip	62	max load
Light Rail – Weekdays	85	boardings per train hr	400	max load
Light Rail – Weekends	65	boardings per train hr	400	max load
Contract Service	Varies	cost per passenger	Varies	cost per passenger

# **Productivity** – Weekdays (M-F)

Route #	Boardings/ Hour	Standard Met	Minority	Low-Income
1	17.9	Yes	No	Yes
11	18.2	Yes	Yes	Yes
13	17.0	Yes	Yes	Yes
15	26.3	Yes	Yes	Yes
19	13.3	Yes	Yes	Yes
21	19.9	Yes	No	No
23	19.9	Yes	No	Yes
25	18.4	Yes	No	Yes
26	20.0	Yes	No	Yes
30	30.0	Yes	No	Yes
38	12.9	Yes	No	Yes
51	25.6	Yes	Yes	Yes
56	17.0	Yes	Yes	Yes
61	14.6	Yes	Yes	Yes
62	15.0	Yes	Yes	No
67	17.3	Yes	Yes	Yes
68	18.7	Yes	Yes	Yes
72	29.6	Yes	Yes	Yes
75	14.8	Yes	Yes	Yes
81	29.2	Yes	No	Yes
82	20.4	Yes	No	Yes
84	17.7	Yes	Yes	Yes
86	19.8	Yes	Yes	Yes
87	26.4	Yes	Yes	Yes
88	18.6	Yes	Yes	Yes
93	21.9	Yes	No	Yes
142	5.2	Yes	Yes	No

*Source: SacRT January 2020 Note: 51X service is not included* 

- 27 regular weekday routes
- The standard for regular weekday service is from 20-40 boardings per hour
- The purpose of the Title VI analysis is to ensure that minority and low-income routes are not over capacity or running too infrequently compared to non-min/LI routes. All routes are below maximum standard.
- No disparate impact

# **Productivity** - Saturday

Route #	Boardings/ Hour	Standard Met	Minority	Low-Income
1	17.9	Yes	No	Yes
11	12.7	Yes	Yes	Yes
13	11.2	Yes	Yes	Yes
15	17.0	Yes	Yes	Yes
19	8.6	Yes	Yes	Yes
21	13.3	Yes	No	No
23	17.5	Yes	No	Yes
25	15.5	Yes	No	Yes
26	11.6	Yes	No	Yes
30	18.1	Yes	No	Yes
38	10.5	Yes	No	Yes
51	25.3	Yes	Yes	Yes
56	9.2	Yes	Yes	Yes
61	10.3	Yes	Yes	Yes
62	8.9	Yes	Yes	No
67	12.6	Yes	Yes	Yes
68	13.5	Yes	Yes	Yes
72	14.5	Yes	Yes	Yes
75	12.5	Yes	Yes	Yes
81	20.7	Yes	No	Yes
82	12.3	Yes	No	Yes
84	12.3	Yes	Yes	Yes
86	15.3	Yes	Yes	Yes
87	18.1	Yes	Yes	Yes
88	11.8	Yes	Yes	Yes
93	15.5	Yes	No	Yes
142	4.0	Yes	Yes	No

Source: SacRT January 2020

- 27 regular Saturday routes
- The standard for regular weekday service is from 15-35 boardings per hour
- The purpose of the Title VI analysis is to ensure that minority and low-income routes are not over capacity or running too infrequently compared to non-min/LI routes. All routes are below maximum standard.
- No disparate impact

# **Productivity** - Sunday

Route #	Boardings/ Hour	Standard Met	Minority	Low-Income
1	14.3	Yes	No	Yes
11	8.7	Yes	Yes	Yes
13	10.0	Yes	Yes	Yes
15	12.9	Yes	Yes	Yes
19	6.2	Yes	Yes	Yes
21	13.3	Yes	No	No
23	18.3	Yes	No	Yes
25	11.8	Yes	No	Yes
26	11.3	Yes	No	Yes
30	12.1	Yes	No	Yes
38	7.9	Yes	No	Yes
51	18.5	Yes	Yes	Yes
56	10.6	Yes	Yes	Yes
61	8.1	Yes	Yes	Yes
62	5.6	Yes	Yes	No
67	12.9	Yes	Yes	Yes
68	14.6	Yes	Yes	Yes
72	11.4	Yes	Yes	Yes
75	8.7	Yes	Yes	Yes
81	16.7	Yes	No	Yes
82	9.4	Yes	No	Yes
84	11.7	Yes	Yes	Yes
86	12.2	Yes	Yes	Yes
87	12.9	Yes	Yes	Yes
88	11.9	Yes	Yes	Yes
93	14.7	Yes	No	Yes
142	2.2	Yes	Yes	No

Source: SacRT January 2020

- 27 regular Sunday routes
- The standard for regular weekday service is from 15-35 boardings per hour
- The purpose of the Title VI analysis is to ensure that minority and low-income routes are not over capacity or running too infrequently compared to non-min/LI routes. All routes are below maximum standard.
- No disparate impact

## **Productivity** – Peak-Only Services

Route #	Boardings/ Hour	Standard Met	Minority	Low-Income
102	22.1	Yes	Yes	No
103	25.0	Yes	Yes	No
105	26.1	Yes	Yes	Yes
106	25.2	Yes	Yes	No
107	22.8	Yes	Yes	Yes
109	25.1	Yes	No	Yes
113	9.0	Yes	Yes	Yes
129	29.5	Yes	No	Yes
134	21.8	Yes	No	No
161	7.5	Yes	No	No
170	21.6	Yes	Yes	Yes
171	14.9	Yes	Yes	Yes
172	20.3	Yes	Yes	No
174	14.4	Yes	Yes	Yes
175	4.4	Yes	Yes	No
176	4.3	Yes	Yes	No
177	19.6	Yes	Yes	No
193	9.4	Yes	No	No
20F	6.0	Yes	No	No

Source: SacRT January 2020

Note: 30F service is not included

19 Peak-Only routes

- The standard for Peak-Only routes are between 25 to 34 boardings per trip for downtown expresses and 15 to 34 boardings per trip for light rail feeders
- The purpose of the Title VI analysis is to ensure that minority and low-income routes are not over capacity or running too infrequently compared to non-minority/non low-income routes. All routes are below maximum standard.

No disparate impact

# **Productivity** - Light Rail

Line	Service Day	Boardings per Train Hour	Standard Met	Minority	Low-Income
Blue	Weekday	128	Yes	Yes	Yes
Gold	Weekday	128	Yes	Yes	Yes
Green	Weekday	38	Yes	Yes	Yes
Blue	Saturday	62	Yes	Yes	Yes
Gold	Saturday	61	Yes	Yes	Yes
Blue	Sunday	50	Yes	Yes	Yes
Gold	Sunday	52	Yes	Yes	Yes

Source: SacRT January 2020

- The standard for light rails is 85-400 boardings per train hour for weekday service and 60-400 boardings per train hour for weekend service
- The purpose of the Title VI analysis is to ensure that minority and low-income routes are not over capacity or running too infrequently compared to non-minority/non low-income routes. The light rail system is below maximum standard.
- No disparate impact

# **On-Time Performance Standards**

- SacRT's target is for the bus system to be 85 percent on-time or better. Individual routes are expected to be within one standard deviation of 85 percent on-time or better.
- For Title VI purposes, all routes are expected to be within one standard deviation of the actual systemwide average or better.
- On-time performance for SacRT's light rail system is measured at the starting point of each trip.
- Trains are considered on-time if they depart 0 to 5 minutes late. SacRT's target is for the light rail system to be 97 percent on-time or better.

# **On-Time Performance** – Weekdays (M-F)

Route	Name	On-Time (Weekday)	Standard Met	Minority	Low- Income
15	DEL PASO HEIGHTS	91%	Yes	Yes	Yes
86	GRAND	90%	Yes	Yes	Yes
1	GREENBACK	89%	Yes	No	Yes
75	MATHER	88%	Yes	Yes	Yes
72	ROSEMONT	88%	Yes	Yes	Yes
30	J STREET	87%	Yes	No	Yes
88	WEST EL CAMINO	83%	Yes	Yes	Yes
87	HOWE	83%	Yes	Yes	Yes
84	WATT	82%	Yes	Yes	Yes
142	INTERNATIONAL	81%	Yes	Yes	No
19	RIO LINDA	81%	Yes	Yes	Yes
81	FLORIN	80%	Yes	No	Yes
61	FRUITRIDGE	80%	Yes	Yes	Yes
23	EL CAMINO	80%	Yes	No	Yes
25	MARCONI	80%	Yes	No	Yes
38	TAHOE PARK	79%	Yes	No	Yes
67	FRANKLIN	79%	Yes	Yes	Yes
82	NORTHROP/MORSE	79%	Yes	No	Yes
51	STOCKTON/BROADWAY	79%	Yes	Yes	Yes
56	MEADOWVIEW	79%	Yes	Yes	Yes
26	FULTON	78%	Yes	No	Yes
62	FREEPORT	77%	Yes	Yes	No
21	SUNRISE	77%	Yes	No	No
13	NATOMAS/ARDEN	74%	Yes	Yes	Yes
68	OAK PARK	72%	Yes	Yes	Yes
93	HILLSDALE	61%	No	No	Yes
11	NATOMAS/LAND PARK	58%	No	Yes	Yes

Source: SacRT January 2020 Note: 51X service is not included

- 27 Weekday routes are evaluated
- System goal is 85 percent on-time
- Actual system average is 79.6 percent
- Title VI goal is to equal or exceed 71.9 percent (within one standard deviation of actuals)
- 2 routes are below standard
- No disparate impact

	Meet the standard	Fail the standard	Total	% Failed
Minority	16	1	17	6%
Non- minority	9	1	10	10%
Low- income	22	2	24	8%
Non Low- income	3	0	3	0%

# **On-Time Performance** - Saturday

Route	Name	On-Time (Saturday)	Standard Met	Minority	Low-Income
142	INTERNATIONAL	92.0%	Yes	Yes	No
15	DEL PASO HEIGHTS	91.7%	Yes	Yes	Yes
21	SUNRISE	91.1%	Yes	No	No
72	ROSEMONT	89.7%	Yes	Yes	Yes
75	MATHER	88.5%	Yes	Yes	Yes
25	MARCONI	88.4%	Yes	No	Yes
56	MEADOWVIEW	86.7%	Yes	Yes	Yes
62	FREEPORT	86.6%	Yes	Yes	No
26	FULTON	86.4%	Yes	No	Yes
13	NATOMAS/ARDEN	85.0%	Yes	Yes	Yes
84	WATT	84.8%	Yes	Yes	Yes
30	J STREET	84.3%	Yes	No	Yes
38	TAHOE PARK	84.2%	Yes	No	Yes
1	GREENBACK	83.5%	Yes	No	Yes
87	HOWE	83.2%	Yes	Yes	Yes
86	GRAND	82.9%	Yes	Yes	Yes
88	WEST EL CAMINO	82.5%	Yes	Yes	Yes
82	NORTHROP/MORSE	82.2%	Yes	No	Yes
23	EL CAMINO	81.3%	Yes	No	Yes
19	RIO LINDA	80.0%	Yes	Yes	Yes
61	FRUITRIDGE	77.4%	Yes	Yes	Yes
67	FRANKLIN	77.0%	Yes	Yes	Yes
93	HILLSDALE	76.0%	No	No	Yes
81	FLORIN	75.6%	No	No	Yes
51	STOCKTON/BROADWAY	73.4%	No	Yes	Yes
68	OAK PARK	72.7%	No	Yes	Yes
11	NATOMAS/LAND PARK	64.7%	No	Yes	Yes

Source: SacRT January 2020

- 27 Saturday routes are evaluated
- System goal is 85 percent on-time
- Actual system average is 82.7 percent
- Title VI goal is to equal or exceed 76.2 percent
  - Within one standard deviation of actuals
- 5 routes are below standard
- 3 of 5 deficient routes are minority routes
- All deficient routes are low-income routes
- <u>Potential disparities found</u> between lowincome and non low-income routes. While federal policy does not require corrective action, this will be addressed in accordance with SacRT policy.
- Improving service so that two additional lowincome routes meet the standard would correct the disparity.

		Meet the standard	Fail the standard	Total	% Failed
	Minority	14	3	17	18%
	Non-				
	minority	8	2	10	20%
	Low-				
	income	20	5	25	20%
	Non Low-				
1	income	2	0	2	0%

# **On-Time Performance** - Sunday

Route	Name	On-Time (Sunday)	Standard Met	Minority	Low-Income
30	J STREET	95.9%	Yes	No	Yes
86	GRAND	93.8%	Yes	Yes	Yes
38	TAHOE PARK	91.8%	Yes	No	Yes
25	MARCONI	90.1%	Yes	No	Yes
21	SUNRISE	90.0%	Yes	No	No
87	HOWE	89.7%	Yes	Yes	Yes
72	ROSEMONT	89.6%	Yes	Yes	Yes
142	INTERNATIONAL	89.3%	Yes	Yes	No
75	MATHER	88.4%	Yes	Yes	Yes
13	NATOMAS/ARDEN	88.1%	Yes	Yes	Yes
1	GREENBACK	88.0%	Yes	No	Yes
81	FLORIN	87.8%	Yes	No	Yes
19	RIO LINDA	87.4%	Yes	Yes	Yes
84	WATT	86.4%	Yes	Yes	Yes
15	DEL PASO HEIGHTS	85.6%	Yes	Yes	Yes
26	FULTON	85.4%	Yes	No	Yes
82	NORTHROP/MORSE	81.9%	Yes	No	Yes
62	FREEPORT	80.9%	Yes	Yes	No
61	FRUITRIDGE	80.7%	Yes	Yes	Yes
68	OAK PARK	80.6%	Yes	Yes	Yes
51	STOCKTON/BROADWAY	76.7%	Yes	Yes	Yes
67	FRANKLIN	76.0%	Yes	Yes	Yes
11	NATOMAS/LAND PARK	75.2%	Yes	Yes	Yes
23	EL CAMINO	69.9%	No	No	Yes
56	MEADOWVIEW	69.9%	No	Yes	Yes
93	HILLSDALE	66.9%	No	No	Yes
88	WEST EL CAMINO	65.8%	No	Yes	Yes

Source: SacRT January 2020

- 27 Sunday routes are evaluated
- System goal is 85 percent on-time
- Actual system average is 83.4 percent
- Title VI goal is to equal or exceed 75.1 percent
  - Within one standard deviation of actuals
- 4 routes are below standard
- 2 of 4 deficient routes are minority routes
- All deficient routes are low-income routes
- <u>Potential disparities found</u> between lowincome and non low-income routes. While federal policy does not require corrective action, this will be addressed in accordance with SacRT policy.
- Improving service so that one additional lowincome route meets the standard would correct the disparity

	Meet the standard	Fail the standard	Total	% Failed
Minority	15	2	17	12%
Non-				
minority	8	2	10	20%
Low-				
income	20	4	24	17%
Non Low-				
income	3	0	3	0%

# **On-Time Performance** – Peak-Only Services

Route	Name	On-Time (Peak-Only)	Standard Met	Minority	Low- Income
113	NORTH MARKET COMMUTER	95%	Yes	Yes	Yes
176	CORDOVAN - ANATOLIA-KAVALA RANCH	88%	Yes	Yes	No
193	AUBURN COMMUTER	88%	Yes	No	No
161	BELVEDERE	84%	Yes	No	No
177	CORDOVAN - VILLAGES	84%	Yes	Yes	No
174	JIBE SOUTHWEST	75%	Yes	Yes	Yes
105	ELSIE	68%	Yes	Yes	Yes
171	JIBE WESTSIDE	68%	Yes	Yes	Yes
102	RIVERSIDE COMMUTER	68%	Yes	Yes	No
175	CORDOVAN - ANATOLIA-SUNRIDGE	66%	Yes	Yes	No
107	SOUTH LAND PARK EXPRESS	66%	Yes	Yes	Yes
129	ARDEN COMMUTER	63%	Yes	No	Yes
172	JIBE CENTRAL	62%	Yes	Yes	No
134	MCKINLEY COMMUTER	61%	Yes	No	No
103	RIVERSIDE EXPRESS	60%	Yes	Yes	No
170	JIBE EASTSIDE	59%	Yes	Yes	Yes
106	LAND PARK COMMUTER	55%	Yes	Yes	No
109	HAZEL EXPRESS	51%	No	No	Yes
20F	FSL	31%	No	No	No

Source: SacRT January 2020 Note: 30F service is not included

- 19 Peak-Only routes
- System goal is 85 percent on-time
- Actual system average is 68 percent
- Title VI goal is to equal or exceed 52.8 percent
  - Within one standard deviation of actuals
- 2 routes are below standard
- 1 of 2 deficient routes is a low-income route
- <u>No disparate impact</u>

	Meet the standard	Fail the standard	Total	% Failed
Minority	13	0	13	0%
Non-				
minority	4	2	6	33%
Low-				
income	7	1	8	13%
Non Low-				
income	10	1	11	9%

# **On-Time Performance** - Light Rail

2019	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	2019 Average
Blue	92.6%	96.7%	96.7%	93.4%	96.1%	96.3%	95.4%	95.0%	94.8%	96.2%	97.2%	97.9%	95.7%
Gold	94.1%	97.7%	97.4%	92.8%	94.3%	95.9%	95.6%	96.2%	96.4%	94.7%	95.9%	97.4%	95.7%
Green	91.5%	91.0%	93.8%	87.3%	90.5%	98.9%	90.1%	91.7%	91.2%	93.3%	77.1%	84.0%	90.0%
Systemwide	92.7%	95.1%	96.0%	91.2%	93.6%	97.0%	93.7%	94.3%	94.1%	94.7%	90.1%	93.1%	93.8%

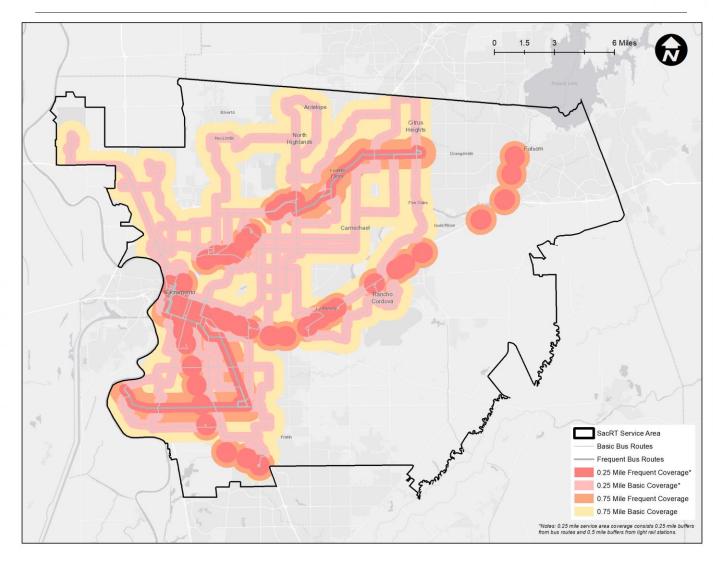
Source: SacRT 2019

- SacRT's target is for the light rail system to be 97 percent on-time or better
- All light rail lines are minority and low-income routes, making comparison to non-minority and non low-income routes not possible
- Light rail on-time performance generally exceeds on-time performance of bus routes
- <u>No evidence of disparate impact</u>

# **Service Coverage Standards**

- Four standards (shown below)
- 3/4-mile distance used for complementary ADA paratransit and National Transit Database reporting
- 1/4-mile from bus route and 1/2-mile from light rail stations identified by FTA as typical walking distances to transit
- Frequent service means 15-minute or better headways: Blue and Gold line, Route 1, Route 51, part of Route 81, and Route 177

Distance	Basic Local Service	High Frequency Service		
0.75 miles from bus routes	85% of population	20% of population		
0.75 miles from rail stations		20% of population		
0.25 miles from bus routes	E00/ of population	10% of population		
0.50 miles from rail stations	50% of population			



Service Area Coverage Map Excluding Supplemental services, CBS, and Peak-Only services

	Total Pop (Min)	Minority	Non Minority	Total Pop (LI) <sup>1</sup>	Low- Income	Non Low- Income	
Total Population	1,270,719	678,827	591,892	1,252,965	353,591	899,374	
Area (sq. miles)	397						
% of Pop. Group to Total							
Service Area Pop.		53.4%	47.6%		28.2%	72.8%	
3/4 Mile Basic Coverage							
	Total Pop (Min)				Low-	Non Low-	
	within 3/4 Mile	Minority <sup>2</sup>	Non Minority	Total Pop (LI) <sup>1</sup>	Income	Income	
Total Population	974,784	536,813	437,971	963,893	303,569	660,324	
Area (sq. miles)	193						
% of Pop. within 3/4 Mile							
Compared to Total		79.1%	74%		85.9%	73.4%	
3/4 Mile Frequent Coverage	•						
	Total Pop (Min)				Low-	Non Low-	
	within 3/4 Mile	Minority	Non Minority	Total Pop (LI) <sup>1</sup>	Income	Income	
Total Population	406,961	241,524	165,437	400,219	137,473	262,746	
Area (sq. miles)	78						
% of Pop. within 3/4 Mile							
Compared to Total		35.6%	28.0%		38.9%	29.2%	
1/4 Mile Basic Coverage							
	Total Pop (Min) within 1/4 Mile	Minority	Non Minority	Total Pop (LI) <sup>1</sup>	Low- Income	Non Low- Income	
Total Population	548,307	308,422	239,885	540,121	184,928	355,193	
Area (sq. miles)	98						
% of Pop. within 1/4 Mile							
Compared to Total		45.4%	40.5%		52.3%	39.5%	
1/4 Mile Frequent Coverage							
	Total Pop (Min)				Low-	Non Low-	
	within 1/4 Mile	Minority	Non Minority		Income	Income	
Total Population	198,733	115,843	82,890	194,470	68,920	125,550	
Area (sq. miles)	39						
% of Pop. within 1/4 Mile							
Compared to Total		17.1% Income sligh	14%		19.5%	14%	

Calculations assume that population is distributed evenly in a block group; the proportion of the block group area inside the buffer is used to estimate the population inside the buffer.

Source: ACS 2017 Five-Year Estimates

- Basic local service 0.75 mile coverage and basic local service 0.25 mile coverage don't meet the standard
- Other coverages meet the standard
  - Difference between minority and non-minority areas, and low-income and non lowincome areas, do not exceed 15% threshold
- No disparate impact

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### **Coverage Standard**

0.75 miles from bus routes85% of population20% of population0.75 miles from rail stationspopulationpopulation0.25 miles from bus routes50% of 10% of10% of	Distance	Basic Local Service	High Frequency Service
0.75 miles from rail stationspopulation population0.25 miles from bus	0.75 miles from bus		
stations       0.25 miles from bus	routes	85% of	20% of
0.25 miles from bus	0.75 miles from rail	population	population
	stations		
routes 50% of 10% of	0.25 miles from bus		
1001CES 50/001 10/001	routes	50% of	10% of
0.50 miles from rail population population	0.50 miles from rail	population	population
stations	stations		

# **Vehicle Assignment Evaluation**

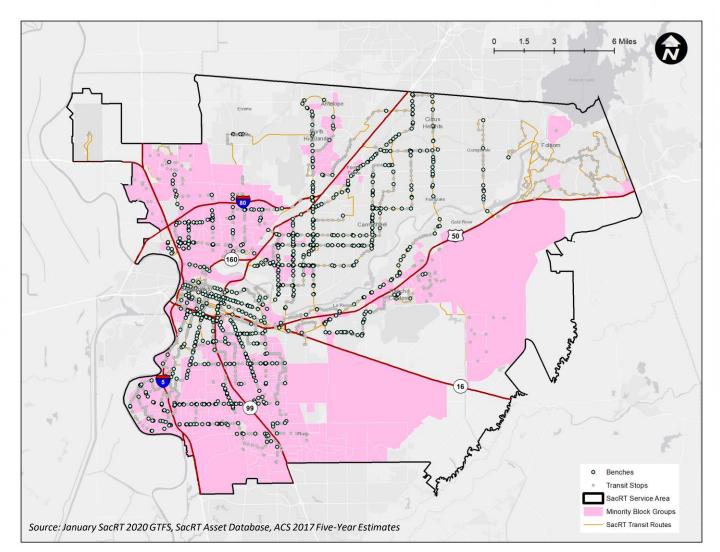
- SacRT assigns vehicles with the goal of providing equitable benefits to minority and low-income populations.
- Vehicle conditions are tracked in SacRT's Transit Asset Management Plan. Rolling stock that exceeds its useful life is documented and replaced as resources are available.
- All vehicles are regularly rotated between routes throughout the SacRT's system and service area. Analysis has verified no biases in distribution of newer vehicles, and therefore finds <u>no evidence of discrimination</u> against minority and low-income populations.

# **Amenities Distribution Standards**

- SacRT's Title VI goal is for the percentage of bus stops equipped with benches/shelters in minority/low-income block groups to be no more than 15% lower than the percentage of bus stops in non-minority/non low-income block groups.
- If the difference between minority/low-income and non-minority/non lowincome amenity distribution exceeds the threshold, the disparate impact will be considered statistically significant and corrective action will be taken.
- For example, if 50% of bus stops in non-minority/non low-income block groups are equipped with benches, then at least 42.5% of bus stops in minority/low-income block groups must have benches in order to meet the Title VI Goal.



### Minority Census Block Groups - Bus Benches





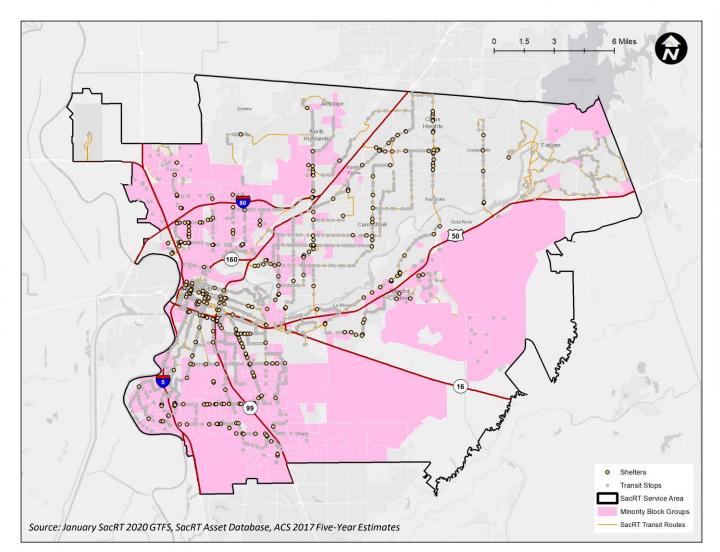
Minority Census Block Groups - Bus Benches

- 2,771 stops in SacRT service area, 857 are equipped with benches
- Just over 29% within the minority block groups have benches
- Minority stops are less likely to be equipped with benches
- Disparate impact threshold is 27.5% for minority block groups
- No disparate impact

	Total Stops	Stops with Benches	% with Benches
Minority	1,184	344	29.1%
Non-Minority	1,587	513	32.3%
Total	2,771	857	30.9%



### Minority Census Block Groups – Bus Shelters





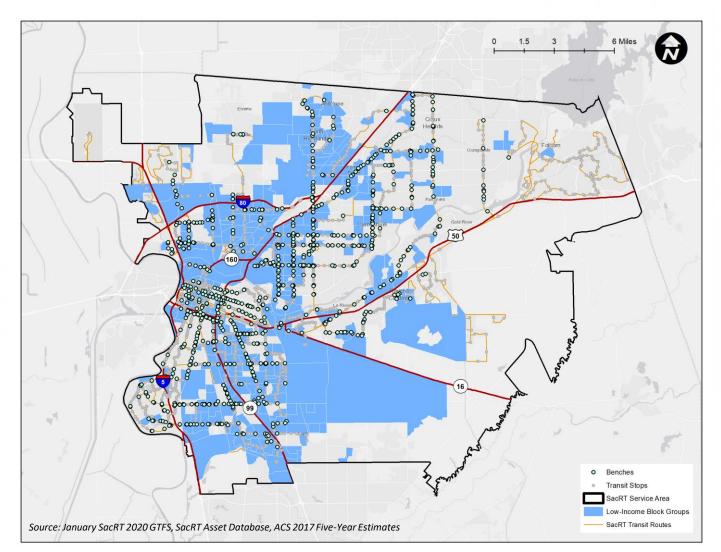
Minority Census Block Groups - Bus Shelters

- 2,771 stops in SacRT service area, 332 are equipped with shelters
- Just over 12% within minority block group have shelters
- Minority stops are more likely to be equipped with shelters
- Disparate impact threshold is 9.9% for minority block groups
- No disparate impact

	Total Stops	Stops with Shelters	% with Shelters
Minority	1,184	146	12.3%
Non-Minority	1,587	186	11.7%
Total	2,771	332	12.0%



### Low-Income Census Block Groups - Bus Benches



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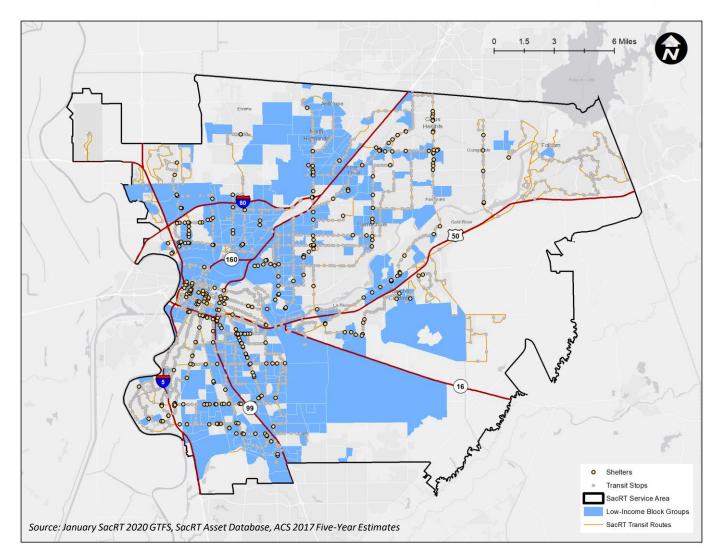
Low-Income Census Block Groups - Bus Benches

- 2,771 stops in SacRT service area, 857 are equipped with benches
- Just over 1/3 stops within the low-income block groups have benches
- Low-Income stops are more likely to be equipped with benches
- Disparate impact threshold is 23.7% for low-income block groups
- No disparate impact

	Total Stops	Stops with Benches	% with Benches
Low-Income	1,182	414	35.0%
Non Low-Income	1,589	443	27.9%
Total	2,771	857	30.9%



### Low-Income Census Blocks Group – Bus Shelters



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Low-Income Census Block Groups – Bus Shelters

- 2,771 stops in SacRT service area, 332 are equipped with shelters
- Just over 14% within the low-income block groups have shelters
- Low-income stops are more likely to be equipped with shelters
- Disparate impact threshold is 8.4% for low-income block groups
- No disparate impact

	Total Stops	Stops with Shelters	% with Shelters
Low-Income	1,182	175	14.8%
Non Low-Income	1,589	157	9.9%
Total	2,771	332	12.0%



### Transit Amenity Distribution Light Rail Stations

• Amenities for light rail stations are distributed according to estimated ridership. Older stations may have been built to more limited SacRT standards. Improvements are programmed as part of SacRT's long-range capital program, as funding permits, to bring them into compliance with SacRT design standards regarding the following amenities:

a) Shelters	j) Information display cases
b) Mini-High Shelters	k) Dynamic Message Signs
c) Drinking fountains	l) Fare Vending Machines
d) Seating (main platform)	m) Smart Card Addfare Machines
e) Seating (mini-high platform)	n) Smart Card Tap Devices
f) Trash receptacles	o) Elevators
g) Recycling receptacles	p) Tree shading
h) Bicycles racks	q) Artwork

 SacRT's Title VI goal is to improve stations located in minority and low-income areas to meet SacRT design standards in line with the goal stated above. <u>No disparate impact is</u> <u>found</u> in the assignment of amenities.

**Bicycle lockers** 

i)

### Transit Amenity Distribution Light Rail Stations

STATION	Platfo	rm Shelter	Mini-H	ligh Shelter	STATION	Platfo	orm S	Shelter	Mini-Hig	gh Shelter
STATION	IB	OB	IB	OB	STATION	IB		OB	IB	OB
12th & I Street	-	Y	-	Y	CRC		Y			Y
13th Street	Y	Ν	Y	Y	Florin	Y		Y	Y	Y
16th Street	Ν	Y	Y	Y	Fruitridge <sup>2</sup>		Y		Y	Y
23rd Street	Y	Ν	N	Ν	Franklin		Y			Υ
29th Street <sup>4</sup>	Y	Y	Y	Y	Glenn <sup>3</sup>		Y		Y	Y
39th Street	Y	Y	Y	Y	Globe <sup>2</sup>		Y		N	Y
47th Avenue	Y	Y	Y	Y	Hazel <sup>3</sup>		Y		Y	Y
48th Street	Y	Y	Y	Y	Historic Folsom <sup>3</sup>		Y		Y	Ν
4th Ave/Wayne Hultgren	Y	Y	Y	Y	Iron Point <sup>3</sup>		Y		Y	Y
59th Street	Y	Ν	N	N	Marconi/Arcade	Y		Ν	N	Ν
7th & Capitol	Ν	-	N	-	Mather Field/Mills	Y		Y	Y	Y
7th & I/County Center	Y	-	Y	-	Meadowview	Y		Y	Y	Y
7th & Richards/Township 9	Y	Y	Y	Y	Power Inn	Y		Y	Y	Y
8th & Capitol	Y	-	N	-	Roseville Road <sup>3</sup>		Y		N	Y
8th & H/County Center	-	Y	-	Y	Royal Oaks	Y		Y	Y	Y
8th & K	-	Ν	-	Y	Sacramento Valley <sup>3</sup>		Y		Y	Y
8th & O <sup>1</sup>	Ν	Ν	N	Ν	9th & K Street <sup>1</sup>	-		Ν	-	Ν
Alkali Flat/La Valentina <sup>2</sup>		Υ	Y	Y	Starfire	Y		Ν	N	Ν
Archives Plaza <sup>1</sup>	Ν	Ν	N	Ν	Sunrise	Y		Y	Y	Y
Arden/Del Paso	Y	Y	Y	Y	Swanston	Y		Ν	Y	Y
Broadway	Y	Y	Y	Y	Tiber	Y		Y	Y	Y
Butterfield	Y	Y	Y	Y	University/65th Street	Y		Ν	N	Ν
Cathedral Square <sup>1</sup>	Ν	Ν	N	Ν	Watt/I-80		Y		Y	Ν
Center Parkway		Υ		Y	Watt/I-80 West		Y		N	Ν
City College	Y	Y	Y	Y	Watt/Manlove	Y		Y	Y	Y
College Greens	Y	Y	Y	Y	Zinfandel	Y		Y	Y	Y
Cordova Town Center	Y	Y	Y	Y						

1. Station is considered a Transit Mall

2. Station has a center platform that serve both the inbound and outbound direction

3. Station situated along single track providing one platform shelter shared by both the inbound and outbound direction

4. 29th Street station is located under a freeway overpass functioning as a shelter



# Conclusion

- SacRT will correct the disparity found in on-time performance for low-income routes on Saturdays by improving service so that at least two additional low-income routes meet the standard. This will reduce the disparity between low-income and non low-income routes to below the 15% threshold.
- SacRT will correct the disparity found in on-time performance for low-income routes on Sundays by improving service so that at least one additional low-income route meets the standard. This will reduce the disparity between low-income and non low-income routes to below the 15% threshold.
- No disparate impacts found in the other service monitoring areas.

# Appendix H

# **Equity Analyses**

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# 2019 Title VI Fare Equity Analysis Student Pass Program



Title VI Fare Equity Analysis Student Pass Program

Final Draft

July 18, 2019

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#### 1. Purpose of Analysis

Pursuant to SacRT'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 SacRT's fare structure.

### 2. Project Description

On May 13, 2019, SacRT staff presented a discussion to the Board of Directors regarding a new initiative to build Student ridership. The initiative is intended to be revenue neutral for SacRT and funded primarily by the City of Sacramento, allowing all grade TK-12 students who either go to school within the City limits of Sacramento, or reside within the City limits but attend a school outside the City's boundaries to ride SacRT's services for free with a School ID and special sticker.

#### 3. Title VI Requirements

SacRT 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 reductions lasting up to six months.<sup>1</sup> Once the funding is secured, Staff intends to seek approval from the SacRT Board for a funding agreement with the City under which SacRT would agree to create a new group pass type for students meeting the eligibility criteria, subject to Board approval of the Title VI analysis. The proposed change to the Student fares for TK-12 students residing or attending school in the City of Sacramento would be implemented in Fall 2019.

Prior to any fare changes being approved permanently, the Board of Directors must approve the findings of a final Title VI fare equity analysis. Prior to approving a final Title VI fare equity analysis, SacRT policy requires that a draft analysis of the proposed changes be made available for a 30-day public review period, that members of the public be invited to comment, and that staff and the Board of Directors take public comments into consideration. In accordance with these requirements, SacRT accepted comments on the draft analysis beginning June 5, 2019 through July 6, 2019. Staff intends to present a final version of the report, including the comments received, to the Board of Directors in August 2019.

<sup>&</sup>lt;sup>1</sup> See FTA Circular 4702.1B, Chapter IV, Section 7 and RT Fare Change Policies (Resolution No. 15-11-0129).

#### 4. Data and Methodology

<u>On-Board Survey</u> – In April 2013, an on-board passenger survey was conducted on SacRT buses and light rail trains. Passengers on randomly selected trips on all SacRT 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, SacRT 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, SacRT may use special surveys or research to estimate minority and/or low-income utilization rates.

<u>Analysis</u> - Using the demographic data from the 2013 on-board survey, SacRT can estimate the percentage that minority and low-income populations utilize each fare type. This data is combined with the average fare per boarding for each fare type from the annual fare survey. SacRT 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 to minority populations, and disproportionate burdens to low-income populations, 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 and the rate of change of the average fare for all low-income riders to that for non-low-income rides, respectively. SacRT's Title VI goal is for the percent increase in average fare for minority or low-income populations to be less than or equal to that for non-minority or non-low-income populations in the case of a net fare increase and equal or greater to that for non-minority or non-low-income populations in the case of a net fare decrease. A disparate impact or disproportionate burden may exist if there is a statistically significant deficiency from this goal. SacRT 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, SacRT used HHS poverty guidelines from 2013.<sup>2</sup> Survey

<sup>&</sup>lt;sup>2</sup> 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

# Regional Transit

Title VI Fare Equity Analysis July 18, 2019

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.<sup>3</sup>

## 5. Baseline Data

Based on Fiscal Year 2018 budget, SacRT will average \$1.45 in fare revenue per passenger boarding. These figures include 184,194 boardings made by children under age five, and 272,391 boardings made by riders in other minor categories for which SacRT has no demographic data. Excluding these categories, and excluding the \$2.3 million deduction for transfer agreement reimbursements to other agencies, (and other adjustments), SacRT collected \$27,276,233 in fares, and 20,004,417 passenger boardings for an average fare of \$1.36 for riders with known demographic data. These figures are used as a baseline for the remainder of this analysis.

#### Figure 1 Baseline Minority Ridership Statistics – FY 2018

	Fare Reve	nue	Boardir	Average	
	Amount	%	Amount	%	Fare
Minority Non-Minority Subtotal	\$20,049,580 <u>\$9,554,720</u> \$29,604,300	67.7% <u>32.3%</u> 100.0%	13,793,474 <u>6,210,943</u> 20,004,417	69.0% <u>31.0%</u> 100.0%	\$1.45 \$1.54 \$1.48
Non-Classified Total	<u>(\$2,328,067)</u> \$27,276,233		<u>456,585</u> 20,004,417		\$1.36
rola	φ21,210,233		20,004,417		φ1.30

Non-classified boardings are already excluded from the Minority splits

Minority riders make up an estimated 69 percent of SacRT ridership and pay an estimated 67.7 percent of fares. They pay an average of \$1.45 per boarding, compared to \$1.54 for non-minority riders.

is typically refreshed during the process of preparing the triennial Title VI update report, which was last updated in 2017.

<sup>&</sup>lt;sup>3</sup> 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 2 Baseline Low-Income Ridership Statistics – FY 2018

	Fare Rev	venue	Boardir	Average		
	Amount %		Amount %		Fare	
Low-Income Non-Low-Income Subtotal	\$14,026,852 <u>\$15,577,448</u> \$29,604,300	47.4% <u>52.6%</u> 100.0%	9,865,321 <u>10,139,096</u> 20,004,417	49.3% <u>50.7%</u> 100.0%	\$1.42 \$1.54 \$1.48	
Non-Classified	<u>(\$2,328,067)</u>		<u>456,585</u>			
Total	\$27,276,233		20,004,417		\$1.36	

Non-classified boardings are already excluded from the Low-income splits

Low-income riders make up an estimated 49.3 percent of SacRT fixed-route ridership and pay an estimated 47.4 percent of fares. They pay an average of \$1.42 per boarding compared to \$1.54 for non-low-income riders.

Baseline fare revenue, passenger boardings, and average fares for Fiscal Year 2018 are provided for each major fare type in Figure 3.

# **Regional Transit**

Title VI Fare Equity Analysis July 18, 2019

# Figure 3 Ridership and Fare Revenue By Fare Type – FY 2018

Fare Type	Face Value	Fare Revenue	Boardings	Average Fare
Single Cash - Bus	¢0.75	\$1,518,222	552 081	<b>ድጋ 75</b>
Single Ticket - Bus	\$2.75 \$2.75	\$525,094	552,081 190,943	\$2.75 \$2.75
Single Cash - Rail	\$2.75 \$2.75	\$1,150,006	886,802	\$1.30
Single Ticket - Rail	\$2.75	\$970,822	579,740	\$1.67
Disc Single Cash - Bus	\$1.35	\$590,553	437,447	\$1.35
Disc Single Tkt - Bus	\$1.35	\$39,083	28,950	\$1.35
Disc Single Cash - Rail	\$1.35	\$500,965	362,097	\$1.38
Disc Single Tkt - Rail	\$1.35	\$49,900	50,519	\$0.99
Daily Pass	\$7.00	\$4,352,702	3,484,916	\$1.25
Disc Daily Pass	\$3.50	\$2,292,374	1,347,126	\$1.70
Monthly Pass	\$110.00	\$6,075,025	2,659,595	\$2.28
Semi-Monthly Pass	\$60.00	\$167,340	66,822	\$2.50
Student Semi-Monthly	\$27.50	\$421,523	752,027	\$0.56
Senr/Disb Monthly/Semi	\$55.00	\$1,161,260	1,189,291	\$0.98
Los Rios		\$2,306,659	1,433,005	\$1.61
CSUS		\$822,386	770,931	\$1.07
DHA		\$2,035,200	1,002,671	\$2.03
Fare Evader		\$0	433,827	\$0.00
Child		\$0	184,194	\$0.00
Lifetime		\$0	88,385	\$0.00
Mobile Single	\$2.75	\$533,588	402,032	\$1.33
Mobile Daily	\$7.00	\$145,810	206,767	\$0.71
Mobile Disc Single	\$1.35	\$61,704	81,130	\$0.76
Mobile Disc Daily	\$3.50	\$39,106	29,995	\$1.30
Connect Card		\$3,844,978	2,967,318	\$1.30
Other Boardings		\$0	272,391	\$0.00
Subtotal		\$29,604,300	20,461,002	\$1.45
Child/Other Boardings		\$0	456,585	\$0.00
Transfer Agreements		پو (\$869,977)	450,585 n/a	,50.00 n∕a
Difference Between Model/Actuals		(\$1,458,090)	n/a	n/a n/a
Total		\$27,276,233	20,004,417	\$1.36

# 6. Demographics of New Fare Type

SacRT surveys show that student demographics are typically considered low-income and high-minority. Users of the Student Monthly and Semi-Monthly Pass (K-12 students), would represent users of the new free fares under the Student Pass Program, which are 87.0% percent minority and 63.8% percent low-income, both well above systemwide averages. Based on this analysis, the Student Pass Program for City of Sacramento students and residents that attend school in the City boundaries is expected to have greater minority and low-income utilization than the overall SacRT system, which has 69.0 percent minority and 49.3 percent low-income utilization.

Fare Type	% Minority	% Low- Income	Minority/ Low- Income Fare Type
Student Pass Program	87.0%	63.8%	Yes
RT System (Baseline)	69.0%	49.3%	

Figure 4 Minority and Low-Income Use

# 7. Change in Sales and Ridership Forecast

A recent analysis of SacRT fare revenues found that students either attending a K-12 school, or living within the City of Sacramento boundaries contribute approximately \$1,000,000 annually. The City of Sacramento is prepared to support this initiative by offsetting the fare revenue loss resulting from the implementation of the Student Pass Program. The new group pass type will be distributed through the eligible schools in the form of a sticker to be placed directly onto the school ID card belonging to the student. The new group pass type will not be sold for purchase; therefore, there is no anticipated sales increase.

Staff is estimating that approximately 100,000 students will be eligible to participate in the Student Pass Program; however, participation is assumed to be less likely for younger students (K – 5<sup>th</sup> grade), so the number of eligible students in this analysis include grades 6<sup>th</sup> through 12<sup>th</sup> only. To determine the ridership impact, existing offerings that are in place for CSUS and Los Rios Community College District were considered, since they are similar in nature. At approximately 39.52 boardings per student, ridership is projected to increase to 2,128,185, which is approximately 1,103,106 more boardings per year than current student ridership.

**Regional Transit** Title VI Fare Equity Analysis July 18, 2019

# 8. Results and Impacts

This analysis includes impacts from the new Student Pass Program, in aggregate with the recent fare structure changes that were included in a previous equity analysis conducted in March 2019.

### Figure 5 Student Pass Program Ridership Forecast

Fare Type	Minority/ Low-Income Fare Type	Fare Revenue	Boardings	Average Fare
Student Pass Program	Yes	\$1,000,000	1,103,106	\$0.91
Baseline - SacRT System		\$27,276,233	20,004,417	\$1.36

The average fare for the Student Pass Program is expected to be \$0.91 per boarding, approximately 33 percent less than SacRT's baseline systemwide average of \$1.36.

# 9. Systemwide Average Fare Impacts

### Figure 6 Impact of Student Pass Program On Systemwide Minority Average Fare

	Fare Revenue		Boardir	Average	
	Amount	%	Amount	%	Fare
Minority	\$19,593,175	68.5%	15,768,345	70.1%	\$1.24
Non-Minority	<u>\$8,995,491</u>	<u>31.5%</u>	<u>6,741,462</u>	<u>29.9%</u>	\$1.33
		100.0			
Subtotal	\$28,588,666	%	22,509,807	100.0%	\$1.27
New Oleasified					
Non-Classified	<u>(\$2,906,544)</u>		<u>456,585</u>		
Total	\$25,682,122		22,509,807		\$1.14
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Non-classified boardings are already excluded from the Minority splits

The new minority average fare is \$1.24, and is lower than the baseline minority average fare, which was \$1.45. Non-minority average fare also decreased, from \$1.54 to \$1.33.

# **Regional Transit** Title VI Fare Equity Analysis July 18, 2019

Under the Student Pass Program change, minority riders would continue to pay less per boarding (\$1.24) than non-minority riders (\$1.33).

#### Figure 7 Impact of Student Pass Program On Systemwide Low-Income Average Fare

	Fare Revenue		Boardir	Average	
	Amount	%	Amount	%	Fare
Low-Income Non-Low-Income Subtotal Non-Classified	\$13,854,614 <u>\$14,734,052</u> \$28,588,666 <u>(\$2,906,544)</u>	48.5% <u>51.5%</u> 100.0 %	11,295,467 <u>11,214,340</u> 22,509,807 <u>456,585</u>	50.2% <u>49.8%</u> 100.0%	\$1.23 \$1.31 \$1.27
Total	\$25,682,122		22,509,807		\$1.14

Non-classified boardings are already excluded from the LI splits

The low-income average fare is \$1.23, and is lower than the baseline low-income average fare, which was \$1.42. Non-low-income average fare also decreased, from \$1.54 to \$1.31. Under the Student Pass Program change, low-income riders would continue to pay less per boarding (\$1.23) than non-low-income riders (\$1.31).

# **10. Comparison of Impacts**

Compared to baseline expectations, minority, non-minority, low-income, and non-low-income riders would all see a reduction in average fare.

#### Figure 8 Change in Average Fare Minority and Low-Income Splits

Rider Type	Existing	Proposed	Change	% Change
All	\$1.48	\$1.27	-\$0.21	-14.18%
Minority	\$1.45	\$1.24	-\$0.21	-14.52%
Non-Minority	\$1.54	\$1.33	-\$0.20	-13.26%
Low-Income	\$1.42	\$1.23	-\$0.20	-13.73%
Non-Low-Income	\$1.54	\$1.31	-\$0.22	-14.48%

# 11. 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 9 Determination of Potential Disparate Impacts and/or Disproportionate Burdens

#### Figure 12 - Disparate Impacts/Disproportionate Burdens

<ul> <li>a. Percent decrease in non-minority avg fare</li> <li>b. Threshold of statistical significance (80% * a)</li> <li>c. Percent decrease in minority avg fare</li> <li>d. Do fares decrease more for non-minority populations? (a &lt; c)</li> <li>e. Is there evidence of a potential disparate impact (c &gt; b)</li> </ul>	-13.26% -10.61% -14.52% No No
f. Percent decrease in non-low-income avg fare	-14.48%
g. Threshold of statistical significance ( 80% * f )	-11.59%
h. Percent decrease in low-income avg fare	-13.73%
i. Do fares decrease more for non-low-income populations? ( f < h )	Yes
j. Is there evidence of a potential disproportionate burden? ( $h > g$ )	No

Based on these results, this analysis finds that the fare changes do not cause any disparate impacts on minority populations, nor do they cause any disproportionate burdens on low-income populations.

# Title VI Service Change Equity Analysis for April 2020 Service Changes



Title VI Service Change Equity Analysis for April 2020 Service Changes

FINAL

November 18, 2019

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# 1. Purpose of Analysis

Pursuant to RT's major service 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 (DI/DB) resulting from service changes planned for April 2020.<sup>1</sup>

# 2. Project Description

SacRT is planning for several service changes on a variety of routes, as summarized in Figure 1. Changes marked as "Major" require a Title VI analysis, a 30-day public review, and Board approval.<sup>2</sup> Changes that are not designated as "Major" do not require public review, but have included in the list for informational purposes.

Route	Major	Description		
11 Natomas/ City College	No	Schedule adjustments for reliability.		
21 Sunrise	No	On weekdays, add a southbound trip beginning at Sunrise Mall at 5:41 am.		
30 J/L Streets	Yes	Restore Saturday headways to every 30 minutes.		
38 Tahoe Park	Yes	Reroute to 29th/30th Streets, T St, and Stockton Blvd (from J/L Street to 39th St.) Adjust schedules to balance passenger loads with Route 30.		
51X Golden 1	No <sup>3</sup>	Route 51X will cease to be an everyday weekday route and will run only on days of major events at the Golden 1 Center.		

#### Figure 1 Proposed Changes

<sup>&</sup>lt;sup>1</sup> SacRT's major service change policy is stated in Resolution No. 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.

<sup>&</sup>lt;sup>2</sup> Creation or elimination of routes or changes to 15 percent or more of a route are generally the threshold for a service change being considered "major." See Resolution No. 13-08-0125 for details.

<sup>&</sup>lt;sup>3</sup> Route 51X is special event service (for the Golden 1 Center). Creation, elimination, or changes to special event service are not considered major service changes.

**Regional Transit** Title VI Service Change Analysis for April 2020 Service Changes November 18, 2019

# Figure 1, cont. Proposed Changes

Route	Major	Description	
56 Meadowview	No	Schedule adjustments for reliability.	
<del>68</del> <del>Oak Park</del>	No	Reroute to Steiner Drive, Sky Parkway, and 65th Street (along prior Route 68 alignment) from 47th Ave to Stockton Blvd. Reroute to Chandler Drive and Lindale Drive from Stockton Blvd to Palmer House Rd.	
75 Rancho Cordova	Yes	Split route into two routes at Mather Field/Mills station. Service to Mather and Kaiser will remain Route 75. Service to/from Butterfield Station will become Route 78.	
78 Butterfield Shuttle	Yes	New route created from part of former Route 75. Route will run from Mather Field/Mills station to Butterfield station via Folsom Blvd. Days, hours, and number of trips will remain the same as on existing Route 75.	
82 Northrop/ Morse	No	Reroute to Mission Ave and Engle Road from Whitney Ave to Walnut Ave.	
93 Hillsdale	No	Reroute to Diablo Dr from Andrea Blvd to Roseville Road.	
142 Airport	Yes	New service from Downtown Sacramento to Sacramento International Airport via I-5 from approximately 3:25 am to 11:35 pm, seven days a week. One SacRT bus per hour will run in each direction, in between existing Yolobus service, for two total buses per hour on 30-minute headways. During morning and afternoon peaks, SacRT will run two buses per hour, for three total buses per hour on 20-minute headways. <b>The start date for this service is contingent upon vehicle availability, but may be as early as January 2020.</b>	

Title VI Service Change Analysis for April 2020 Service Changes November 18, 2019

## 3. Title VI Requirements

Under SacRT's major service change policy, initiation of major service changes requires a Title VI service change equity analysis. SacRT policy requires Title VI analyses be made available for a 30-day public review and comment period, that the SacRT Board of Directors and staff review public comments and take them into consideration, and that the SacRT Board of Directors approve a final equity analysis prior to adoption of major service changes. In accordance with these requirements, a draft version of this report was made available for public review on October 14, 2019.



Title VI Service Change Analysis for April 2020 Service Changes November 18, 2019

### 4. Existing Conditions

Based on Census data, the SacRT service area is 53.2 percent minority<sup>4</sup> and 20.1 percent low-income.<sup>5</sup> Figures 3 and 4 illustrate minority and low-income population density in the SacRT service area. Based on passenger surveys, prior to the major changes for SacRT Forward in September 2019, actual SacRT ridership is 69.0 percent minority and 47.8 percent low-income.<sup>6</sup> Based on how service levels changed on particular routes, staff estimated that with the SacRT Forward changes now in effect, SacRT ridership is now 72.3 percent minority and 55.8 percent low-income.

	Service Area	Actual Customers (Post SacRT Forward)
Minority	53.2%	72.3%
Low-Income	20.1%	55.8%

#### Figure 2 Existing SacRT Demographics

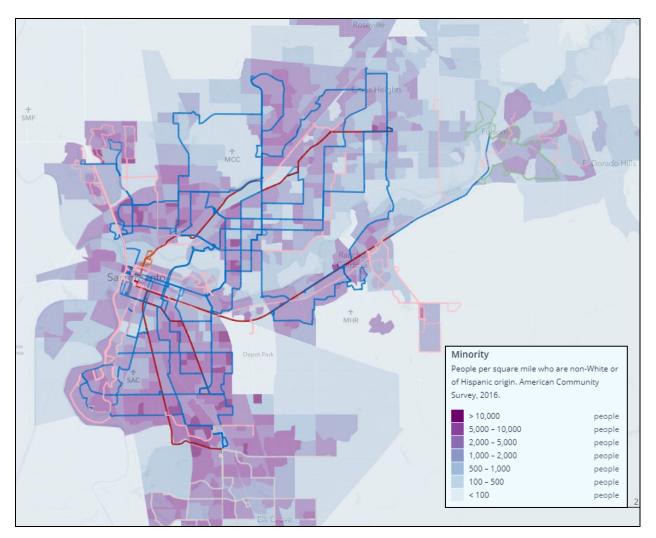
<sup>&</sup>lt;sup>4</sup> FTA defines a minority person as anyone who is American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, or Native Hawaiian or other Pacific Islander.

<sup>&</sup>lt;sup>5</sup> 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, SacRT 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 this survey, the participant's income is assumed to be the midpoint of the range selected. 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.

<sup>&</sup>lt;sup>6</sup> In April 2013, an on-board passenger survey was conducted aboard SacRT buses and light rail trains. Passengers on randomly selected trips on all SacRT routes completed a self-administered questionnaire on various rider characteristics, including minority and low-income status. An updated survey is planned for 2020.

# Title VI Service Change Analysis for April 2020 Service Changes November 18, 2019

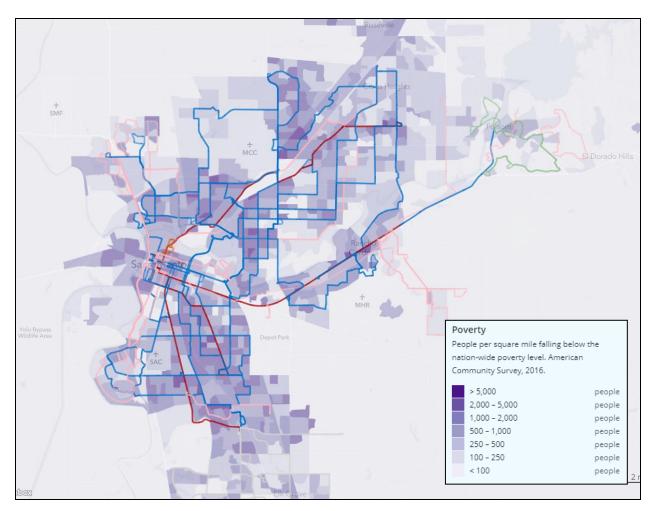
Figure 3 Minority Population Density



Source: 2017 American Community Survey, 5-year data set (2013-2017) Prepared using Remix software

Title VI Service Change Analysis for April 2020 Service Changes November 18, 2019

Figure 4 Low-Income Population Density



Source: 2017 American Community Survey, 5-year data set (2013-2017) Prepared using Remix software

Title VI Service Change Analysis for April 2020 Service Changes November 18, 2019

### 5. Potential Impacts

Of the twelve changes listed in Figure 1, only five are considered major service changes. Of those five, only two have measureable changes in level of service. The other four technically meet the definition of a major service change, but do not actually have any measureable impacts.

Route	Major Change	Net Change in Revenue Miles	Analysis Required
11	No	No	No
21	No	Yes	No
30	Yes	Yes	Yes
38	Yes	No	No
51X	No	Yes	No
56	No	No	No
68	No	No	No
75	Yes	No	No
78	Yes	No	No
82	No	No	No
93	No	No	No
142	Yes	Yes	Yes

### Figure 5 Title VI Requirements by Route

The changes to Routes 38 are cost-neutral realignments of the routes from one street to different nearby streets. No other changes are being proposed to the level of service itself. While the ridership may differ slightly as a consequence of operating on a different street, the precision of passenger survey data and Census Bureau data is not sufficient to make a determination.

Route 75 is merely being split into two routes (with the new route being Route 78), with no changes to the number of trips, stops, hours, or frequency of service on either of the resulting two routes, so while it technically meets the definition of a major service change, in substance there will not be any Title VI ramifications.

Based on the discussion above, the changes proposed to Route 30 and the creation of Route 142 are the only two changes with potential Title VI consequences.

Title VI Service Change Analysis for April 2020 Service Changes November 18, 2019

<u>Route 30</u> – Ridership on Route 30 on weekends is 59.3 percent minority and 60.0 percent low-income. The percent minority is lower than the SacRT systemwide average, but does not exceed the 15 percent threshold of statistical significance. The percent low-income exceeds the SacRT systemwide average. *Therefore, there would not be any disparate impacts on minority populations nor any disproportionate burdens on low-income populations from the proposed changes to Route 30.* 

	Route 30 (Weekends)	SacRT System (Post SacRT Forward)
Minority	59.3%	72.3%
Low-Income	60.0%	55.8%

### Figure 6 Route 30 Weekend Demographics

<u>Route 142</u> – As an airport service, Route 142 would cater to two primary rider types: (1) airport travelers, and (2) airport employees; however, demographics of the route's actual ridership are not known. For the purposes of Title VI compliance, SacRT will need to conditionally approve this route as a temporary service, survey the ridership, prepare an equity analysis, and either approve or eliminate the route permanently within one year.

Title VI Service and Fare Equity Analysis for Causeway Connection Bus Service



Title VI Service and Fare Equity Analysis for Causeway Connection Bus Service

DRAFT

October 14, 2019

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# 1. Purpose of Analysis

Pursuant to RT's major service 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 (DI/DB) resulting from initiation of the service and related changes to the SacRT fare structure.<sup>1</sup>

# 2. Project Description

The University of California, Davis (UCD) currently runs an hourly shuttle bus between the UCD main campus in Davis and the UC Davis Medical Center (Med Center) in Sacramento. The shuttle operates Monday through Friday on hourly headways, is funded by UCD, and is operated by a private carrier.

Over the past year, staff from SacRT, UCD, the Yolo County Transportation District (YCTD), the City of Sacramento, Electrify America (EA), and the Sacramento Area Council of Governments (SACOG) have been developing a plan to change the service from being a private, closed-door intercampus shuttle to being an open-door public intercity express service with stops in Downtown Sacramento and Davis, using a new all-electric bus fleet. Under the proposed plan, ownership of the fleet and operation of the service would be split 50/50 between SacRT and YCTD.

The fleet will consist of 12 full-size Proterra Catalyst E2 battery-electric buses. Six buses will be owned by SacRT, six by YCTD. Overnight charging will take place at SacRT and at Yolobus yards. In-service charging will also be available at the Med Center terminal and at Mondavi Center terminal in Davis. The fleet and charging infrastructure is being paid for, purchased, and constructed by EA with the assistance of SacRT and YCTD, pursuant to the Volkswagen settlement with the California Air Resources Board (CARB), as approved by the SacRT Board on February 25, 2019. Buses will be 40-foot low-floor transit buses with 30 seats, two wheelchair spaces, three bicycle racks, free WiFi, and USB charging ports at all seats.

<u>Operating Cost</u> – The gross annual operating cost of the new service is estimated at \$1,620,000. For the three year term of the Memorandum of Understanding (MOU), CMAQ funds would pay half the operating cost, net of fares. The remainder of the \$1,620,000 budgeted operating cost, minus fare revenue, would be paid by UCD.

<sup>&</sup>lt;sup>1</sup> RT's major service change policy is stated in Resolution No. 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.

**Transit** Draft Title VI Service and Fare Equity Analysis For Causeway Connection Bus Service October 14, 2019

Figure 1 Example 40-Foot Proterra Catalyst E2



<u>Service Description</u> – The new service would take effect on April 6, 2020 and operate Monday through Friday every hour from approximately 6:00 am to 7:00 pm with 20-30 minute frequency during morning and afternoon peak hours. It is expected to have three stops in Davis and approximately three stops in Sacramento. Travel times will be approximately 45 minutes from end to end, consistent with the existing service.

<u>Fare Structure</u> – SacRT fares would be in effect (i.e., \$2.50 base fare, \$1.25 discount fare, \$100 monthly passes, free for TK-12 students) and Connect Card and Zip Pass would both be accepted. Like many major employers, UCD is planning on subsidizing employee pass purchases, reducing the out-of-pocket price to \$35 per month. (This would be a reduction in out-of-pocket price from the existing \$45 monthly pass for the shuttle.) UCD undergraduate student ID cards would be valid for unlimited rides on the service, but not on other SacRT routes.

<u>Marketing and Customer Information</u> – The new service will be rebranded as the "Causeway Connection" and jointly operated by SacRT and YCTD. UCD will maintain a central web page for the service. To create a seamless customer experience, (1) both agencies will use the same route number, (2) timetables will show trips operated by either agency, and (3) customers will be directed to a single third party app which will integrate both operators' real-time vehicle location data.

<u>Approval Authority</u> - As proposed, the Causeway Connection would become a service of both SacRT and YCTD. The SacRT Board would acquire the authority to make alterations to the service and/or fare structure, subject to SacRT's major service change and fare change policies; however, SacRT would agree to synchronize changes with YCTD and conform to the approximate service description set forth in the three-party MOU.

## 3. Title VI Requirements

Under SacRT's major service change policy, initiation of this new route is considered a major service change and requires a Title VI service change equity analysis. The SacRT fare structure would also be amended to include the UC Davis Undergraduate Student ID as a valid group fare for customers boarding the Causeway Connection. This change requires a Title VI fare equity analysis. These two analyses have been combined into this single document.

SacRT policy requires Title VI analyses be made available for a 30-day public review and comment period, that the SacRT Board of Directors and staff review public comments and take them into consideration, and that the SacRT Board of Directors approve a final equity analysis prior to adoption of major service changes or amendment of the fare structure.

SacRT plans to present a revised and final version of this report to the SacRT Board of Directors on November 18, 2019 and seek approval at that time of the new service, the fare changes, and the MOU with YCTD and UCD.



## 4. Existing Conditions

Based on Census data, the SacRT service area is 53.2 percent minority<sup>2</sup> and 20.1 percent low-income.<sup>3</sup> Figures 3 and 4 illustrate minority and low-income population density in the SacRT service area. Based on passenger surveys, prior to the major changes for SacRT Forward in September 2019, actual SacRT ridership is 69.0 percent minority and 47.8 percent low-income.<sup>4</sup> Based on how service levels changed on particular routes, staff estimated that with the SacRT Forward changes now in effect, SacRT ridership is now 72.3 percent minority and 55.8 percent low-income.

	Service Area	Actual Customers (Post SacRT Forward)
Minority	53.2%	72.3%
Low-Income	20.1%	55.8%

#### Figure 2 Existing SacRT Demographics

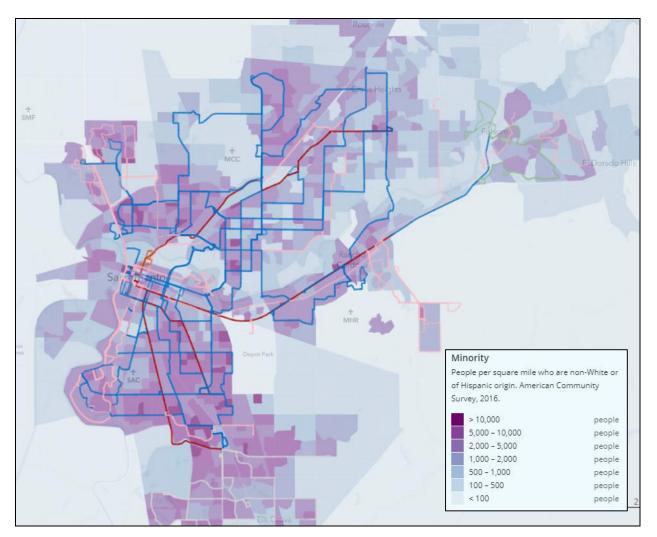
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<sup>&</sup>lt;sup>4</sup> In April 2013, an on-board passenger survey was conducted aboard SacRT buses and light rail trains. Passengers on randomly selected trips on all SacRT routes completed a self-administered questionnaire on various rider characteristics, including minority and low-income status. An updated survey is planned for 2020.

#### **Regional Transit** Draft Title VI Service and Fare Equity Analysis For Causeway Connection Bus Service October 14, 2019

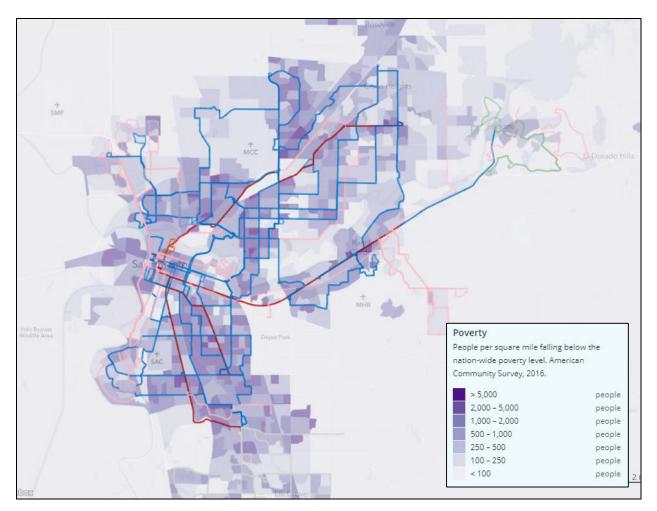
Figure 3 Minority Population Density



Source: 2017 American Community Survey, 5-year data set (2013-2017) Prepared using Remix software

#### **Regional Transit** Draft Title VI Service and Fare Equity Analysis For Causeway Connection Bus Service October 14, 2019

Figure 4 Low-Income Population Density



Source: 2017 American Community Survey, 5-year data set (2013-2017) Prepared using Remix software

# 5. Impacts of New Service

Based on employee and student data furnished by UCD, and passenger survey data on existing shuttle rider affiliations, existing shuttle riders are estimated to be approximately 23.7 percent minority and 36.4 percent low-income. While ridership on the new Causeway Connection will differ, the demographics of the existing riders are believed to be a reasonable indicator of what demographics of the new service's riders would be.

Existing SacRT customers are 72.3 percent minority, compared to only 23.7 percent for existing shuttle riders, a difference exceeding SacRT's 15 percent threshold of statistical significance; therefore, *there may be potential disparate impacts (DI) to minority populations from the new service.* 

Existing SacRT customers are 55.8 percent low-income, compared to only 36.4 percent for existing shuttle riders, a difference exceeding SacRT's 15 percent threshold of statistical significance; therefore, *there may be potential disproportionate burdens (DB) on low-income populations from the new service.* 

	Existing SacRT Customers	Existing Shuttle Riders
Minority	72.3%	23.7%
Low-Income	55.8%	36.4%

Figure 5 Demographic Comparison for Service Change

The above findings of potential DI/DBs do not prohibit SacRT from implementing the proposed changes; however, before doing so, the SacRT Board must declare a "substantial legitimate justification" for the changes, show that there are no alternatives that would have a less disparate impact on minority riders, and take steps to avoid, minimize, or mitigate impacts to low-income riders, where practicable.

<u>Justification</u> - Justification for the changes can be found when the context of the changes is considered. From the standpoint of SacRT alone, the project would add new service that would disproportionately serve non-minority and non-low-income populations; however, from the standpoint of the partnership collectively, and from the standpoint of actual beneficiaries, the project would essentially turn an existing private,

closed-door shuttle into public transportation, open to the general public. Therefore, in substance (and contrary to the *prima facie* numerical analysis) the results of the project will actually result in a clear *benefit* to minority and low-income populations compared to the status quo.

It should also be noted that the service becoming public transportation would also trigger a requirement for complementary paratransit service to persons with disabilities, under the Americans With Disabilities Act, which must be fulfilled by the operating agencies (i.e., SacRT and YCTD). SacRT customers eligible for ADA paratransit are estimated to be 82.0 percent minority and 74.6 percent low-income, both well above SacRT fixed-route system averages

<u>Alternatives</u> - With respect to alternatives and/or the avoidance, minimization, or mitigation of impacts, the relevant fact is that the project is not a unilateral action by SacRT and it is not funded from SacRT's unrestricted funds. On the contrary, capital costs are being covered by a purpose-restricted settlement (i.e., via Electrify America) and operating costs would be covered by a purpose-restricted grant (a Federal Congestion Mitigation and Air Quality grant) and by UCD, at its discretion. Because there is no net capital or operating cost to SacRT's only realistic alternative to proceeding with the project as negotiated would be, a no-action scenario, which would be of no benefit to minority/low-income populations whatsoever.

#### **Transit** Draft Title VI Service and Fare Equity Analysis For Causeway Connection Bus Service October 14, 2019

Figure 6 Catchment Area of New Service



The Causeway Connection is planned to have stops at: (1) the Mondavi Center, (2) Downtown Davis, (3) East Davis (near Target), (4) Downtown Sacramento (near P and 7th Streets), Midtown Sacramento (near P and 30th Street), and (6) at the Med Center.

# 6. Impacts of Fare Change

Under the proposal, UCD undergraduate students would be allowed to make unlimited rides on the Causeway Connection using their student ID cards, which would be considered a new fare type for SacRT, requiring an equity analysis. Users of this fare type would be conferred a benefit by being allowed to ride for free. These users would be UCD undergraduates, who as a group, have much different demographics than existing shuttle riders overall. Undergraduates are estimated to be 72.0 percent minority and 58.7 percent low-income.<sup>6</sup>

Systemwide SacRT ridership is 72.3 percent minority, so the new fare type would have 0.3 percent lower minority utilization; however, differences of less than 15 percent are not considered statistically significant. Therefore, *there are no potential disparate impacts to minority populations from creating this new fare type.* 

Systemwide SacRT ridership is 55.8 percent low-income, so the new fare type would have 2.9 percent greater low-income utilization. Therefore, *there are no potential disproportionate burdens on low-income populations from creating this new fare type.* 

	Existing SacRT Riders	UC Davis Undergraduates
Minority	72.3%	72.0%
Low-Income	55.8%	58.7%

Figure 7 Demographic Comparison for Fare Change

Sources: UC Davis Common Data Set 2018-2019

<sup>&</sup>lt;sup>6</sup> Pell Grant eligibility was used as a proxy for low-income status and was taken, along with ethnicity, from the UC Davis Common Data Set report for 2018-2019, available at *https://aggiedata.ucdavis.edu*.

# Title VI Equity Analysis for Fare Changes



Title VI Equity Analysis for Fare Changes

DRAFT

February 22, 2019

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# 1. Purpose of Analysis

Pursuant to SacRT'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 SacRT's fare structure.

# 2. Project Description

This analysis covers the following fare changes to the current fare structure.

- 1. <u>Fare Reduction</u> On August 27, 2018, SacRT authorized changes to the fare structure, on a temporary six-month basis beginning October 1, 2018, including:
  - a. Reduction of the Single Ride Fare, from \$2.75 to \$2.50
  - b. Reduction of the Discount Single Ride Fare, from \$1.35 to \$1.25
  - c. Reduction of the Monthly Pass, from \$110.00 to \$100
  - d. Reduction of the Semi-Monthly Pass, from \$60.00 to \$50
  - e. Reduction of the Senior/Disabled Monthly Sticker, from \$55.00 to \$50.00
  - f. Reduction of the Senior/Disabled Semi-Monthly Sticker, from \$30.00 to \$25.00
  - g. Reduction of the Super Senior Monthly Sticker, from \$42.00 to \$40.00

As part of this fare change, SacRT's single ride fare for complementary ADA paratransit was also reduced from \$5.50 to \$5.00; however, Federal guidance does not require an analysis of paratransit service or fare changes as part of Title VI civil rights compliance.

- <u>Transfer Fare</u> In addition to the fare structure changes listed above, SacRT also authorized the creation of a cash transfer fare priced at \$0.25 with a 90-minute, single-ride transfer privilege
- 3. Los Rios Pass Program Changes On October 22, 2018, SacRT authorized changes to the Los Rios college pass program, to take effect on January 1, 2019, pending approval of a final version of this Title VI fare equity analysis. Under the current program, students enrolled in three units or fewer are ineligible for the full semester unlimited ride pass, but may purchase individual month passes at a discounted price. The proposed changes would eliminate the monthly pass option under the Los Rios program, and instead, students enrolled in three units or fewer would be eligible for the full semester unlimited ride pass that the remainder of the student body is eligible for.
- 4. <u>Folsom-Only Fares</u> On January 28, 2019, SacRT authorized changes to the fare structure, adding Folsom-only fares for Seniors (55+) on fixed-route service, as well as Folsom Dial-A-Ride fares on a temporary six-month basis, beginning

on February 4, 2019. Dial-a-ride fares are excluded from this fare equity analysis as they apply only to demand-response service, which is exempt from a fare equity analysis. Folsom-only fares discussed in this analysis include:

- a. Folsom Senior Monthly Pass, \$50.00 (Connect Card only)
- b. Folsom Senior Discount Single Ride, \$1.25
- c. Folsom Senior Discount Daily Pass, \$3.50

#### 3. Title VI Requirements

SacRT 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 reductions lasting up to six months.<sup>1</sup>

Prior to any fare changes being approved permanently, the Board of Directors must approve the findings of a final Title VI fare equity analysis. Prior to approving a final Title VI fare equity analysis, SacRT policy requires that a draft analysis of the proposed changes be made available for a 30-day public review period, that members of the public be invited to comment, and that staff and the Board of Directors take public comments into consideration. In accordance with these requirements, this document will be published on SacRT's web site and SacRT will provide notice to customers of the opportunity to provide comments.

The fare structure changes which took effect on October 1, 2018 on a temporary basis will automatically be rescinded on March 31, 2019, unless the SacRT Board approves a final version of this Title VI fare equity analysis in accordance with its Title VI policy, and approves a resolution making the fare changes permanent.

The proposed changes to the Los Rios pass program require both the approval of the SacRT Board and amendments to the contract between SacRT and the Los Rios Community College District. On October 22, 2018, a contract amendment between the two parties was presented to the SacRT Board and authorized for approval, pending approval of a final version of this Title VI fare equity analysis.

The fare structure changes which took effect on February 4, 2019 on a temporary basis will automatically be rescinded on August 3, 2019, unless the SacRT Board approves a final version of this Title VI fare equity analysis in accordance with its Title VI policy, and approves a resolution making the fare changes permanent.

<sup>&</sup>lt;sup>1</sup> See FTA Circular 4702.1B, Chapter IV, Section 7 and RT Fare Change Policies (Resolution No. 15-11-0129).

## 4. Data and Methodology

<u>On-Board Survey</u> – In April 2013, an on-board passenger survey was conducted on SacRT buses and light rail trains. Passengers on randomly selected trips on all SacRT 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, SacRT 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, SacRT may use special surveys or research to estimate minority and/or low-income utilization rates.

<u>Analysis</u> - Using the demographic data from the 2013 on-board survey, SacRT can estimate the percentage that minority and low-income populations utilize each fare type. This data is combined with the average fare per boarding for each fare type from the annual fare survey. SacRT 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 to minority populations, and disproportionate burdens to low-income populations, 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 and the rate of change of the average fare for all low-income riders to that for non-low-income rides, respectively. SacRT's Title VI goal is for the percent increase in average fare for minority or low-income populations to be less than or equal to that for non-minority or greater to that for non-minority or non-low-income populations in the case of a net fare increase and equal or greater to that for non-minority or non-low-income populations in the case of a net fare increase and equal statistically significant deficiency from this goal. SacRT 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, SacRT used HHS poverty guidelines from 2013.<sup>2</sup> Survey

<sup>&</sup>lt;sup>2</sup> 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 2017.

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.<sup>3</sup>

#### 5. Baseline Data

Based on Fiscal Year 2018 budget, SacRT will average \$1.45 in fare revenue per passenger boarding. These figures include 184,194 boardings made by children under age five, and 272,391 boardings made by riders in other minor categories for which SacRT has no demographic data. Excluding these categories, and excluding the \$2.3 million deduction for transfer agreement reimbursements to other agencies, (and other adjustments), SacRT collected \$27,276,233 in fares, and 20,004,417 passenger boardings for an average fare of \$1.36 for riders with known demographic data. These figures are used as a baseline for the remainder of this analysis.

Figure 1 Baseline Minority Ridership Statistics – FY 2018

	Fare Reve	Fare Revenue Boardings		Average	
	Amount	%	Amount %		Fare
Minority Non-Minority Subtotal	\$20,049,580 <u>\$9,554,720</u> \$29,604,300	67.7% <u>32.3%</u> 100.0%	13,793,474 <u>6,210,943</u> 20,004,417	69.0% <u>31.0%</u> 100.0%	\$1.45 \$1.54 \$1.48
Non-Classified	<u>(\$2,328,067)</u>		<u>456,585</u>		
Total	\$27,276,233		20,004,417		\$1.36

Non-classified boardings are already excluded from the Minority splits

Minority riders make up an estimated 69 percent of SacRT ridership and pay an estimated 67.7 percent of fares. They pay an average of \$1.45 per boarding, compared to \$1.54 for non-minority riders.

<sup>&</sup>lt;sup>3</sup> 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.

	Fare Revenue		Boardi	Average	
	Amount	%	Amount	%	Fare
Low-Income Non-Low-Income Subtotal	\$14,026,852 <u>\$15,577,448</u> \$29,604,300	47.4% <u>52.6%</u> 100.0%	9,865,321 <u>10,139,096</u> 20,004,417	49.3% <u>50.7%</u> 100.0%	\$1.42 \$1.54 \$1.48
Non-Classified	<u>(\$2,328,067)</u>		<u>456,585</u>		
Total	\$27,276,233		20,004,417		\$1.36

#### Figure 2 Baseline Low-Income Ridership Statistics – FY 2018

Non-classified boardings are already excluded from the Low-income splits

Low-income riders make up an estimated 49.3 percent of SacRT fixed-route ridership and pay an estimated 47.4 percent of fares. They pay an average of \$1.42 per boarding compared to \$1.54 for non-low-income riders.

Baseline fare revenue, passenger boardings, and average fares for Fiscal Year 2018 are provided for each major fare type in Figure 3.

Fare Type	Face Value	Fare Revenue	Boardings	Average Fare
Single Cash - Bus	\$2.75	\$1,518,222	552,081	\$2.75
Single Ticket - Bus	\$2.75	\$525,094	190,943	\$2.75 \$2.75
Single Cash - Rail	\$2.75	\$1,150,006	886,802	\$1.30
Single Ticket - Rail	\$2.75	\$970,822	579,740	\$1.67
Disc Single Cash - Bus	\$1.35	\$590,553	437,447	\$1.35
Disc Single Tkt - Bus	\$1.35	\$39,083	28,950	\$1.35
Disc Single Cash - Rail	\$1.35	\$500,965	362,097	\$1.38
Disc Single Tkt - Rail	\$1.35	\$49,900	50,519	\$0.99
Daily Pass	\$7.00	\$4,352,702	3,484,916	\$1.25
Disc Daily Pass	\$3.50	\$2,292,374	1,347,126	\$1.70
Monthly Pass	\$110.00	\$6,075,025	2,659,595	\$2.28
Semi-Monthly Pass	\$60.00	\$167,340	66,822	\$2.50
Student Semi-Monthly	\$27.50	\$421,523	752,027	\$0.56
Senr/Disb Monthly/Semi	\$55.00	\$1,161,260	1,189,291	\$0.98
Los Rios		\$2,306,659	1,433,005	\$1.61
CSUS		\$822,386	770,931	\$1.07
DHA		\$2,035,200	1,002,671	\$2.03
Fare Evader		\$0	433,827	\$0.00
Child		\$0	184,194	\$0.00
Lifetime		\$0	88,385	\$0.00
Mobile Single	\$2.75	\$533,588	402,032	\$1.33
Mobile Daily	\$7.00	\$145,810	206,767	\$0.71
Mobile Disc Single	\$1.35	\$61,704	81,130	\$0.76
Mobile Disc Daily	\$3.50	\$39,106	29,995	\$1.30
Connect Card		\$3,844,978	2,967,318	\$1.30
Other Boardings		\$0	272,391	\$0.00
Subtotal		\$29,604,300	20,461,002	\$1.45
Child/Other Boardings		\$0	456,585	\$0.00
Transfer Agreements		(\$869,977)	n/a	n/a
Difference Between Model/Actuals		(\$1,458,090)	n/a	n/a
Total		\$27,276,233	20,004,417	\$1.36

# Figure 3 Ridership and Fare Revenue By Fare Type – FY 2018

## 6. Demographics of Existing Fares and New Fares

Users of the reduced fare types are drawn entirely from existing Basic and Discount single ride and monthly pass users. Transfer ticket users are drawn entirely from existing Basic and Discount single ride and daily pass users; therefore, demographics for transfer ticket users are being represented in this analysis by Basic and Discount single ride and daily pass users.

Demographics for Folsom fare users are unknown; however, the Folsom-only fare types apply only to senior riders, which have been defined as 55 years of age and over. Therefore, Folsom-only fares are being represented in this analysis by SacRT's senior rider demographics. The Folsom Senior Monthly Pass fare type will be reflected by SacRT's Senior/Disabled Monthly/Semi-Monthly Pass users. The Folsom Senior Discount Single Ride fare type will be reflected by a combination of SacRT's discounted single ride fares on bus. The Folsom Senior Discount Daily Pass fare type will be reflected by a combination of SacRT's discounted daily pass fares.

	% Minority	% Low- Income	Minority/ Low- Income Fare Type
Reduced Fares & Transfers:			
Single Cash - Bus	66.0%	46.8%	No
Single Ticket - Bus	57.0%	7.2%	No
Single Cash - Rail	64.0%	43.3%	No
Single Ticket - Rail	48.7%	5.5%	No
Disc Single Cash - Bus	72.3%	52.8%	Yes
Disc Single Tkt - Bus	74.5%	40.0%	Yes
Disc Single Cash - Rail	71.4%	44.3%	Yes
Disc Single Tkt - Rail	45.5%	30.0%	No
Daily Pass	75.5%	59.6%	Yes
Disc Daily Pass	75.2%	60.7%	Yes
Monthly Pass	58.5%	26.4%	No
Semi-Monthly Pass	72.7%	44.6%	Yes
Senior/Disabled Monthly/Semi	46.0%	41.9%	No
Los Rios:	77.0%	57.8%	Yes
Folsom-Only Fares:	46.0%	41.9%	No
Folsom Senior Monthly Pass (55+)	46.0%	41.9%	No
Folsom Senior Discount Single Ride (55+)	71.3%	45.5%	Yes
Folsom Senior Discount Daily Pass (55+)	71.2%	52.2%	Yes
RT System (Baseline)	67.4%	48.2%	

#### Figure 4 Minority and Low-Income Use

Based on this analysis, the Discount Single cash fares on bus and rail, the Discount Single ticket on bus, the Daily and Discount Daily Pass, and the Semi-Monthly Pass

fares are expected to have greater minority utilization than the overall SacRT system, which has 67.4 percent minority utilization. The new Folsom-only single and daily fares for seniors are also expected to have greater minority utilization.

Based on this analysis, the Discount Single cash fare on bus, the Daily and Discount Daily Pass, and the new Folsom-only Daily Pass for seniors are expected to have greater low-income utilization than the overall SacRT system, which has 48.2 percent low-income utilization.

Additionally, the Los Rios changes are expected to have greater minority and low-income utilization than the overall SacRT system.

#### 7. Results and Impacts

The changes to the fare structure that are included in this analysis have been proposed as ridership building initiatives. The proposed fare reductions temporarily lower the single ride and monthly pass fares to levels prior to the fare increase that was imposed in July 2016. Staff anticipates a 6-month net cost of approximately \$594,676 in fare revenue from lowering fares, and annual boardings are expected to increase approximately 342,000. The reintroduction of a \$0.25 transfer allows riders to make a single transfer as they were able to do so before the elimination of them in 2009. Staff anticipates a 6-month net cost of approximately \$273,970 in fare revenue from reintroducing transfers, and annual boardings are expected to increase approximately 216,000.

Renegotiating the Los Rios contract allows Los Rios students a free transit pass for every semester they are enrolled, with no minimum number of units. Staff anticipates an increase of \$140,000 in fare revenue, and approximately 840,000 annual boardings.

The addition of Folsom-only fares are expected to have a small impact to fare revenue and boardings, with an expected \$3,181 increase in fare revenue, and an additional 4,284 boardings from seniors on Folsom's fixed-route bus service.

#### 8. Net Sales and Ridership Impacts

Based on this fare equity analysis, most of the fare categories will decrease in fare revenue, and increase in boardings, which was the goal of SacRT's ridership initiatives. The Los Rios pass changes will actually increase both fare revenue and boardings, as well as the new Folsom-only fares. Fare revenue and boardings for each impacted fare type, and average fares are shown in Figure 5.

Fare Type	Minority/Low- Income Fare Type	Fare Revenue	Boardings	Average Fare
Reduced Fares & Transfers				
Single Cash - Bus	No	\$1,307,195	594,093	\$2.20
Single Ticket - Bus	No	\$452,108	205,473	\$2.20
Single Cash - Rail	No	\$990,160	954,286	\$1.04
Single Ticket - Rail	No	\$835,882	623,857	\$1.34
Disc Single Cash - Bus	Yes	\$508,469	470,736	\$1.08
Disc Single Tkt - Bus	Yes	\$33,651	31,153	\$1.08
Disc Single Cash - Rail	Yes	\$431,333	389,652	\$1.11
Disc Single Tkt - Rail	No	\$42,964	54,363	\$0.79
Daily Pass	Yes	\$4,153,780	3,579,952	\$1.16
Discount Daily Pass	Yes	\$2,187,611	1,383,863	\$1.58
Monthly Pass	No	\$5,508,255	2,789,456	\$1.97
Semi-Monthly Pass	Yes	\$151,728	70,085	\$2.16
Senior/Disabled Monthly/Semi	No	\$1,052,920	1,247,361	\$0.84
Los Rios	Yes	\$2,446,659	2,273,005	\$1.08
Folsom	No	\$3,181	4,284	\$0.74
Subtotal - New fares		\$20,105,894	14,671,618	\$1.37
Baseline - SacRT System		\$27,276,233	20,004,417	\$1.36

Figure 5 Sales and Ridership Impacts for Affected/New Fare Types

Fare Type	Before	After	Change
Reduced Fares & Transfers:			
Single Cash - Bus	\$1,518,222	\$1,307,195	(\$211,027)
Single Ticket - Bus	\$525,094	\$452,108	(\$72,986)
Single Cash - Rail	\$1,150,006	\$990,160	(\$159,846)
Single Ticket - Rail	\$970,822	\$835,882	(\$134,940)
Disc Single Cash - Bus	\$590,553	\$508,469	(\$82,084)
Disc Single Tkt - Bus	\$39,083	\$33,651	(\$5,432)
Disc Single Cash - Rail	\$500,965	\$431,333	(\$69,632)
Disc Single Tkt - Rail	\$49,900	\$42,964	(\$6,936)
Daily Pass	\$4,352,702	\$4,153,780	(\$198,922)
Disc Daily Pass	\$2,292,374	\$2,187,611	(\$104,763)
Monthly Pass	\$6,075,025	\$5,508,255	(\$566,770)
Semi-Monthly Pass	\$167,340	\$151,728	(\$15,612)
Sen/Disabled Monthly/Semi	\$1,161,260	\$1,052,920	(\$108,340)
Los Rios:	\$2,306,659	\$2,446,659	\$140,000
Folsom:	\$0	\$3,181	\$3,181
Total	\$21,700,005	\$20,105,894	(\$1,594,111)

Figure 6 Expected Change in Fare Revenue

The cumulative impact of the fare reduction, transfers, changes to the Los Rios pass and new Folsom-only fares result in a fare revenue cost of approximately \$1.6 million annually.

Figure 7 Expected Change in Boardings

Fare Type	Before	After	Change
Reduced Fares & Transfers:			
Single Cash - Bus	552,081	594,093	42,012
Single Ticket - Bus	190,943	205,473	14,530
Single Cash - Rail	886,802	954,286	67,484
Single Ticket - Rail	579,740	623,857	44,117
Disc Single Cash - Bus	437,447	470,736	33,289
Disc Single Tkt - Bus	28,950	31,153	2,203
Disc Single Cash - Rail	362,097	389,652	27,555
Disc Single Tkt - Rail	50,519	54,363	3,844
Daily Pass	3,484,916	3,579,952	95,036
Disc Daily Pass	1,347,126	1,383,863	36,737
Monthly Pass	2,659,595	2,789,456	129,861
Semi-Monthly Pass	66,822	70,085	3,263
Sen/Disabled Monthly/Semi	1,189,291	1,247,361	58,070
Los Rios:	1,433,005	2,273,005	840,000
Folsom:	0	4,284	4,284
Total	13,269,334	14,671,618	1,402,284

The cumulative impact of the fare reduction, transfers, changes to the Los Rios pass and new Folsom-only fares result in an increase of approximately 1.4 million boardings annually.

#### 9. Impact on Average Fares

All of the impacted fare categories will see a reduction in the average fare. The average fare for single ride fares will decrease by approximately 20%, and the daily pass fares will decrease by approximately 7%. The monthly pass fares will decrease by approximately 14%, and the average fare for the Los Rios pass will decrease by approximately 33%.

New Fare Type	Old Average Fare	New Average Fare	Change	% Change	Minority/Low- Income Type?
Single Cash - Bus	\$2.75	\$2.20	(\$0.55)	-20%	No
Single Ticket - Bus	\$2.75	\$2.20	(\$0.55)	-20%	No
Single Cash - Rail	\$1.30	\$1.04	(\$0.26)	-20%	No
Single Ticket - Rail	\$1.67	\$1.34	(\$0.33)	-20%	No
Disc Single Cash - Bus	\$1.35	\$1.08	(\$0.27)	-20%	Yes
Disc Single Tkt - Bus	\$1.35	\$1.08	(\$0.27)	-20%	Yes
Disc Single Cash - Rail	\$1.38	\$1.11	(\$0.28)	-20%	Yes
Disc Single Tkt - Rail	\$0.99	\$0.79	(\$0.20)	-20%	No
Daily Pass	\$1.25	\$1.16	(\$0.09)	-7%	Yes
Disc Daily Pass	\$1.70	\$1.58	(\$0.12)	-7%	Yes
Monthly Pass	\$2.28	\$1.97	(\$0.31)	-14%	No
Semi-Monthly Pass	\$2.50	\$2.16	(\$0.34)	-14%	Yes
Sen/Disabled Monthly/Semi	\$0.98	\$0.84	(\$0.13)	-14%	No
Los Rios:	\$1.61	\$1.08	(\$0.53)	-33%	Yes
Folsom:	\$0.00	\$0.74	\$0.74	N/A	No

#### Figure 8 Change in Average Fare

# **10. System wide Average Fare Impacts**

	Fare Revenue		Boardir	Boardings		
	Amount	%	Amount %		Average Fare	
Minority Non-Minority Subtotal	\$19,089,900 <u>\$8,920,289</u> \$28,010,189	68.2% <u>31.8%</u> 100.0%	14,808,643 <u>6,598,058</u> 21,406,701	69.2% <u>30.8%</u> 100.0%	\$1.29 \$1.35 \$1.31	
Non-Classified	<u>(\$2,328,067)</u>		<u>456,585</u>			
Total	\$25,682,122		21,406,701		\$1.20	

#### Figure 9 Impact of Fare Changes On Systemwide Minority Average Fare

Non-classified boardings are already excluded from the Minority splits

The new minority average fare is \$1.29, and is lower than the baseline minority average fare, which was \$1.45. Non-minority average fare also decreased, from \$1.54 to \$1.35. Under the fare changes included in this analysis, minority riders would continue to pay less per boarding (\$1.29) than non-minority riders (\$1.35).

#### Figure 10 Impact of Fare Changes On Systemwide Low-Income Average Fare

	Fare Revenue		Boardir	Boardings		
	Amount	%	Amount	%	Fare	
Low-Income Non-Low-Income Subtotal	\$13,485,341 <u>\$14,524,848</u> \$28,010,189	48.1% <u>51.9%</u> 100.0%	10,591,296 <u>10,815,405</u> 21,406,701	49.5% <u>50.5%</u> 100.0%	\$1.27 \$1.34 \$1.31	
Non-Classified	<u>(\$2,328,067)</u>		<u>456,585</u>			
Total	\$25,682,122		21,406,701		\$1.20	

Non-classified boardings are already excluded from the LI splits

The low-income average fare is \$1.27, and is lower than the baseline low-income average fare, which was \$1.42. Non-low-income average fare also decreased, from

\$1.54 to \$1.34. Under the fare changes included in this analysis, low-income riders would continue to pay less per boarding (\$1.27) than non-low-income riders (\$1.34).

#### **11. Comparison of Impacts**

Compared to baseline expectations, minority, non-minority, low-income, and non-low-income riders would all see a reduction in average fare.

Rider Type	Existing	Proposed	Change	% Change
All	\$1.48	\$1.31	-\$0.17	-11.58%
Minority	\$1.45	\$1.29	-\$0.16	-11.31%
Non-Minority	\$1.54	\$1.35	-\$0.19	-12.12%
Low-Income	\$1.42	\$1.27	-\$0.15	-10.45%
Non-Low-Income	\$1.54	\$1.34	-\$0.19	-12.59%

#### Figure 11 Change in Average Fare Minority/Low-Income Splits

## 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

<ul> <li>a. Percent decrease in non-minority avg fare</li> <li>b. Threshold of statistical significance (80% * a)</li> <li>c. Percent decrease in minority avg fare</li> <li>d. Do fares decrease more for non-minority populations? (a &lt; c)</li> </ul>	-12.12% -9.69% -11.31% Yes
e. Is there evidence of a potential disparate impact ( $c > b$ )	No
f. Percent decrease in non-low-income avg fare g. Threshold of statistical significance(80% * f)	-12.59% -10.07%
h. Percent decrease in low-income avg fare	-10.45%
i. Do fares decrease more for non-low-income populations? ( f < h )	Yes
j. Is there evidence of a potential disproportionate burden? ( $h > g$ )	No

Based on these results, this analysis finds that the fare changes do not cause any disparate impacts on minority populations, nor do they cause any disproportionate burdens on low-income populations.

# 2018 Title VI Fare Equity Analysis



Title VI Fare Equity Analysis

June 11, 2018

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EXNIDIT A

#### 1. Purpose of Analysis

Pursuant to SacRT'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 SacRT's fare structure.

A draft of this analysis was released on May 1, 2018 for a 30-day public review.

#### 2. Project Description

On December 11, 2017, SacRT authorized, on a temporary six-month basis, a reduction in the price of the Student Semi-Monthly Pass from \$27.50 to \$10.00. The fare changes were implemented on January 1, 2018, and were authorized to continue through June 30, 2018.

On January 22, 2018, SacRT made two additional amendments to the fare structure relating to student fares. The first amendment allowed for the sale of a Student Monthly Pass on electronic media (i.e., a full month pass), and the second was to amend the fare structure to permit school ID cards to serve as verification of eligibility for student fare types.

#### 3. Title VI Requirements

SacRT 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 reductions lasting up to six months.<sup>1</sup> The proposed change to the Student Semi-Monthly Pass was implemented on January 1, 2018 for a six-month pilot ending on June 30, 2018. Staff is seeking approval from the SacRT Board to make this change permanent.

Prior to any fare changes being approved permanently, the Board of Directors must approve the findings of a final Title VI fare equity analysis. Prior to approving a final Title VI fare equity analysis, SacRT policy requires that a draft analysis of the proposed changes be made available for a 30-day public review period, that members of the public be invited to comment, and that staff and the Board of Directors take public comments into consideration. In accordance with these requirements, a draft version of this report was published on SacRT's web site on May 1, 2018, with comments received through May 30, 2018.

<sup>&</sup>lt;sup>1</sup> See FTA Circular 4702.1B, Chapter IV, Section 7 and RT Fare Change Policies (Resolution No. 15-11-0129).

EXNIDIT A

#### 4. Data and Methodology

<u>On-Board Survey</u> – In April 2013, an on-board passenger survey was conducted on SacRT buses and light rail trains. Passengers on randomly selected trips on all SacRT 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, SacRT 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, SacRT may use special surveys or research to estimate minority and/or low-income utilization rates.

<u>Analysis</u> - Using the demographic data from the 2013 on-board survey, SacRT can estimate the percentage that minority and low-income populations utilize each fare type. This data is combined with the average fare per boarding for each fare type from the annual fare survey. SacRT 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 to minority populations, and disproportionate burdens to low-income populations, 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 and the rate of change of the average fare for all low-income riders to that for non-low-income rides, respectively. SacRT's Title VI goal is for the percent increase in average fare for minority or low-income populations to be less than or equal to that for non-minority or non-low-income populations in the case of a net fare increase and equal or greater to that for non-minority or non-low-income populations in the case of a net fare increase and equal statistically significant deficiency from this goal. SacRT 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, SacRT used HHS poverty guidelines from 2013.<sup>2</sup> Survey

<sup>&</sup>lt;sup>2</sup> 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

# Title VI Fare Equity Analysis June 11, 2018

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.<sup>3</sup>

#### 5. Baseline Data

Based on Fiscal Year 2019 budget forecasts, SacRT expects to collect \$28,122,210 in fares over 19,416,000 passenger boardings for an average fare of \$1.45 per passenger boarding. These figures include adjustments for transfer agreement reimbursements to other agencies, boardings made by children under age five, and boardings made by riders in other minor categories for which SacRT has no demographic data. These figures are used as a baseline for the remainder of this analysis.

#### Figure 1 Baseline Minority Ridership Statistics – FY 2019

	Fare Reve	nue	Boardings		Average
	Amount	%	Amount	%	Fare
Minority	\$18,383,857	65.4%	12,459,454	64.2%	\$1.48
Non-Minority	\$9,738,353	34.6%	6,956,546	35.8%	\$1.40
All Riders	\$28,122,210	100.0%	19,416,000	100.0%	\$1.45

Minority riders make up an estimated 64.2 percent of SacRT ridership and pay an estimated 65.4 percent of fares. They pay an average of \$1.48 per boarding, compared to \$1.40 for non-minority riders.

#### Figure 2 Baseline Low-Income Ridership Statistics – FY 2019

	Fare Revenue		Boarding	Average	
	Amount	%	Amount	%	Fare
Low-Income	\$12,152,973	43.2%	8,486,853	43.7%	\$1.43
Non-Low-Income	\$15,969,237	56.8%	10,929,147	56.3%	\$1.46
All Riders	\$28,122,210	100.0%	19,416,000	100.0%	\$1.45

is typically refreshed during the process of preparing the triennial Title VI update report, which was last updated in 2017.

<sup>3</sup> 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.

EXNIDIT A

**Regional Transit** Title VI Fare Equity Analysis June 11, 2018

Low-income riders make up an estimated 43.7 percent of SacRT fixed-route ridership and pay an estimated 43.2 percent of fares. They pay an average of \$1.43 per boarding compared to \$1.46 for non-low-income riders.

Baseline fare revenue, passenger boardings, and average fare forecasts for Fiscal Year 2019 are provided for each major fare type in Figure 3.



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# Transit Regional Transit

Title VI Fare Equity Analysis June 11, 2018

# Figure 3 Ridership and Fare Revenue By Fare Type – FY 2019 Forecasts (Baseline)

Fare Type	Face Value	Fare Revenue	Boardings	Average Fare
Single Cash - Bus	\$2.75	\$1,765,598	643,722	\$2.74
Single Ticket - Bus	\$2.75	\$539,864	196,830	\$2.74
Single Cash - Rail	\$2.75	\$1,167,789	870,503	\$1.34
Single Ticket - Rail	\$2.75	\$1,030,581	715,848	\$1.44
Disc Single Cash - Bus	\$1.35	\$514,990	382,476	\$1.35
Disc Single Tkt - Bus	\$1.35	\$45,922	34,106	\$1.35
Disc Single Cash - Rail	\$1.35	\$410,731	367,560	\$1.12
Disc Single Tkt - Rail	\$1.35	\$29,089	194,860	\$0.15
Daily Pass	\$7.00	\$3,285,124	2,858,283	\$1.15
Disc Daily Pass	\$3.50	\$1,944,753	1,241,008	\$1.57
Monthly Pass	\$110.00	\$7,998,196	3,581,533	\$2.23
Semi-Monthly Pass	\$60.00	\$215,729	131,815	\$1.64
Student Semi-Monthly	\$27.50	\$649,526	691,287	\$0.94
Senr/Disb Monthly/Semi	\$55.00	\$1,786,306	1,687,229	\$1.06
Los Rios	+	\$2,005,890	1,475,135	\$1.36
CSUS		\$916,822	832,367	\$1.10
DHA		\$1,688,049	790,590	\$2.14
Fare Evader		\$0	605,955	\$0.00
Child		\$0	372,045	\$0.00
Lifetime		\$0	94,224	\$0.00
Mobile Single	\$2.75	\$399,205	181,164	\$2.20
Mobile Daily	\$7.00	\$38,676	71,892	\$0.54
Mobile Disc Single	\$1.35	\$103,559	41,770	\$2.48
Mobile Disc Daily	\$3.50	\$25,734	14,889	\$1.73
G1 Employee Pass		\$500,000	283,200	\$1.77
Round Trip (Special Event)	\$5.50	\$46,693	16,979	\$2.75
Round Trip (Discount Spec Event)	\$2.75	\$11,166	8,273	\$1.35
Daily Best Fare - Full	\$7.00	\$143,458	96,180	\$1.49
Daily Best Fare - Disc	\$3.50	\$26,957	24,312	\$1.11
90m Ticket - Full	\$2.75	\$703,165	479,082	\$1.47
90m Ticket - Disc	\$1.35	\$128,639	120,899	\$1.06
Other Boardings		\$0	309,982	
Total		\$28,122,210	19,416,000	\$1.45

#### 6. Demographics of Fare Change

SacRT surveys show that student demographics are typically considered low-income and high-minority. Users of the Student Semi-Monthly Pass are 87.0% percent minority and 63.8% percent low-income, both well above systemwide averages.

Based on this analysis, the fare changes are expected to have greater minority and lowincome utilization than the overall SacRT system, which has 64.2 percent minority and 43.7 percent low-income utilization.

Fare Type	% Minority	% Low- Income	Minority/ Low-Income Fare Type
Student Semi-Monthly Pass	87.0%	63.8%	Yes
SacRT System (Baseline)	64.2%	43.7%	

Figure 4 Minority and Low-Income Use

#### 7. Results and Impacts

Based on actual and projected sales data for the first three months of the changes (i.e., from January 1, 2018 through March 31, 2018), revenues are projected to decrease by \$190,622 per year for FY 2019; however, boardings are expected to increase by 207,386 per year.

#### Figure 5 Student Monthly/Semi-Monthly Pass Sales and Ridership Forecasts

Fare Type	Face Value	Minority/Low- Income Fare Type	Fare Revenue	Boardings	Average Fare
Baseline FY 2019 (No changes)	\$27.50	Yes	\$649,526	691,287	\$0.94
Projected Changes			(\$190,622)	207,386	
Proposed FY 2019 Totals	\$10.00/ \$20.00	Yes	\$458,904	898,673	\$0.51

The average fare for the affected customers is expected to be \$0.51 per boarding, approximately 65 percent less than SacRT's existing systemwide average of \$1.45.

#### 8. Systemwide Average Fare Impacts

If the proposed changes are approved, SacRT is expected to average \$1.42 in fare revenue per passenger boarding for Fiscal Year 2019, a reduction of \$0.03 from the baseline estimate of \$1.45.

#### Figure 6 Systemwide Average Fare by Minority Status With Proposed Fare Change

	Fare Revenue		Boardings	<u>Avg. Fare</u>	
	Amount	%	Amount	%	
Minority	\$18,218,016	65.2%	12,639,880	64.4%	\$1.44
Non-Minority	\$9,713,572	34.8%	6,983,506	35.6%	\$1.39
All Riders	\$27,931,588	100.0%	19,623,386	100.0%	\$1.42

Under the proposed change, minority riders would pay slightly more per boarding (\$1.44) than non-minority riders (\$1.39); however this is already the case and the proposed change would reduce this difference.

#### Figure 7 Systemwide Average Fare by Low-Income Status With Proposed Fare Change

	Fare Revenue		Boardings	<u>Avg. Fare</u>	
	Amount	%	Amount	%	
Low-Income	\$12,031,289	43.1%	8,619,238	43.9%	\$1.40
Non-Low-Income	\$15,900,300	56.9%	11,004,148	56.1%	\$1.44
All Riders	\$27,931,588	100.0%	19,623,386	100.0%	\$1.42

Under the proposed change, low-income riders would pay slightly less per boarding (\$1.40) than non-low-income riders (\$1.44).

#### 9. Comparison of Impacts

Compared to existing conditions, all riders would see a reduction in average fare; however, minority and low-income riders would experience a greater reduction than

non-minority and non-low-income riders. In other words, this change would be beneficial to both minority and low-income populations.

#### Figure 8 Projected Change in Average Fare Minority and Low-Income Splits

Rider Type	Existing	Proposed	Change	% Change
All	\$1.45	\$1.42	-\$0.03	-2.11%
Minority	\$1.48	\$1.44	-\$0.04	-2.78%
Non-Minority	\$1.40	\$1.39	-\$0.01	-0.72%
Low-Income	\$1.43	\$1.40	-\$0.03	-2.14%
Non-Low-Income	\$1.46	\$1.44	-\$0.02	-1.39%

#### 10. 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 9 Determination of Potential Disparate Impacts and/or Disproportionate Burdens

a. Percent decrease in non-minority avg fare	-0.72%
b. Threshold of statistical significance(80% * a)	-0.58%
c. Percent decrease in minority avg fare	-2.78%
d. Do fares decrease more for non-minority populations? ( a < c )	No
e. Is there evidence of a potential disparate impact ( c > b )	No
f. Percent decrease in non-low-income avg fare	-1.39%
g. Threshold of statistical significance(80% * f)	-1.11%
h. Percent decrease in low-income avg fare	-2.14%
i. Do fares decrease more for non-low-income populations? ( f < h )	No
j. Is there evidence of a potential disproportionate burden? ( $h > g$ )	No

The fare change is expected to benefit minority populations more than non-minority populations; therefore, this analysis finds *that there are no potential disparate impacts on minority populations as a result of the proposed fare changes.* 

EXNIDIT A

# **Regional Transit**

Title VI Fare Equity Analysis June 11, 2018

The fare change is also expected to benefit low-income populations more than non-lowincome populations; therefore, this analysis finds *that there are no potential disproportionate burdens on low-income populations as a result of the proposed fare changes.* 

# Title VI Equity Analysis for Service Changes Proposed for 2019



Title VI Equity Analysis for Service Changes Proposed for 2019

REVISED

February 18, 2019



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# 1. Purpose of Analysis

Pursuant to RT's major service 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 a variety of service changes proposed to take effect throughout 2019 and potentially 2020.<sup>1</sup>

# 2. Project Description

This analysis encompasses two separate service change projects:

- Changes to potentially all of SacRT's bus routes, and potential changes to light rail schedules, as part of the **SacRT Forward** project
- Improvement of **weekend light rail headways** from 30 to 15 minutes, which took effect on a temporary basis on January 6, 2019

The potential changes from the SacRT Forward project are intended for implementation beginning June 16, 2019, but due to the large number of changes, implementation could potentially take effect in phases throughout the remainder of 2019 and early 2020. Details on the project are available at sacrt.com.

The light rail headway improvements took effect on January 6, 2019, and would be made permanent with adoption of a final Title VI analysis. This analysis will focus first on the more complicated SacRT Forward project, then cover the light rail headway improvements in Section 8.

#### 3. Title VI Requirements

SacRT policy requires a draft Title VI service change equity analysis be made available for a 30-day public review and comment, that the SacRT Board of Directors and staff review public comments and take them into consideration, and that the SacRT Board of Directors approve a final equity analysis prior to adoption of major service changes. A draft version of this report was published on January 18, 2019.

This version reflects revisions made to the SacRT Forward plan published on or about February 18, 2019 and is intended to serve as the final analysis of the project for purposes of satisfying Title VI approval requirements.

<sup>&</sup>lt;sup>1</sup> RT's major service change policy is stated in Resolution No. 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.

Demographics of Existing Routes									
Route	Percent Minority	Percent Low- Income	Route	Percent Minority	Percent Low- Income	Route	Percent Minority	Percent Low- Income	
1	62.4%	58.7%	28	50.7%	29.5%	68	83.3%	64.6%	
2	76.8%	28.4%	29	26.1%	10.8%	72	70.9%	55.9%	
3	68.8%	4.7%	30	58.9%	37.2%	74	73.7%	40.6%	
5	90.1%	62.3%	33	70.4%	91.7%	75	60.9%	64.7%	
6	75.8%	33.0%	34	50.0%	25.7%	80	67.9%	58.7%	
7	63.2%	0.0%	38	69.4%	43.4%	81	86.1%	58.2%	
11	80.5%	35.2%	47	85.7%	68.8%	82	65.8%	53.8%	
13	74.5%	57.5%	51	78.5%	61.1%	84	65.1%	54.6%	
15	74.7%	66.9%	54	85.7%	57.7%	86	82.5%	50.2%	
19	67.6%	52.9%	55	87.9%	67.3%	87	73.1%	63.8%	
21	61.9%	49.8%	56	90.9%	62.2%	88	69.9%	44.8%	
22	69.4%	55.6%	61	80.2%	50.9%	93	73.3%	62.4%	
23	62.5%	64.1%	62	71.1%	51.3%	95	47.3%	48.8%	
24	61.4%	38.2%	65	88.8%	54.9%	103	30.8%	8.3%	
25	56.6%	54.1%	67	80.4%	64.8%	109	37.5%	11.8%	
26	76.2%	67.5%							

# Figure 1 Demographics of Existing Routes

# Figure 2 Demographics of Proposed Routes

Route	Percent Minority	Percent Low- Income	Route	Percent Minority	Percent Low-Income	Route	Percent Minority	Percent Low- Income
1	62.4%	58.7%	56	90.9%	62.2%	88	69.9%	44.8%
11	80.5%	35.2%	61	80.2%	50.9%	93	73.3%	62.4%
13	74.5%	57.5%	62	71.1%	51.3%	102	76.8%	28.4%
15	74.7%	66.9%	67	80.4%	64.8%	103	68.8%	4.7%
19	67.6%	52.9%	68	83.3%	64.6%	105	90.1%	62.3%
21	61.9%	49.8%	72	70.9%	55.9%	106	75.8%	33.0%
23	62.5%	64.1%	75	60.9%	64.7%	107	63.2%	0.0%
25	56.6%	54.1%	81	86.1%	58.2%	109	37.5%	11.8%
26	76.2%	67.5%	82	65.8%	53.8%	129	26.1%	10.8%
30	58.9%	37.2%	84	65.1%	54.6%	134	50.0%	25.7%
33	70.4%	91.7%	86	82.5%	50.2%	161	80.2%	50.9%
38	69.4%	43.4%	87	73.1%	63.8%	193	30.8%	8.3%
51	78.5%	61.1%						

# 4. Data and Methodology

In April 2013, an on-board passenger survey was conducted aboard SacRT buses and light rail trains. Passengers on randomly selected trips on all SacRT routes completed a self-administered questionnaire on various rider characteristics. Figures 1 and 2 provide the demographics of each route, existing and proposed, based on these surveys. For new or majorly altered routes, a benchmark route was chosen from the existing system.

For this analysis, revenue miles are used as an indicator of level of service. The analysis considers the distribution of service for the existing and proposed system. For the purpose of the SacRT Forward project and this analysis, 46 regular fixed-route bus routes were considered to be part of the existing system. This excludes supplemental/seasonal bus routes (typically operated to address overcrowding due to school ridership) and contract service (i.e., service paid for by third parties and operated by SacRT through a service agreement).

Route	Weekday	Saturday	Sun/Hol	Annual	_	Route	Weekday	Saturday	Sun/Hol	Annual
1	1,008	550	525	315,554		51	1,095	602	441	335,449
2	284	0	0	72,093		54	300	142	0	83,664
3	97	0	0	24,729		55	413	151	127	120,377
5	194	0	0	49,304		56	618	515	253	198,622
6	286	0	0	72,735		61	338	0	0	85,951
7	62	0	0	15,850		62	630	304	0	175,697
11	384	243	0	110,154		65	399	0	0	101,417
13	209	0	0	53,150		67	708	342	342	217,863
15	631	319	285	193,721		68	681	329	329	209,352
19	608	419	419	200,998		72	430	162	155	126,664
21	882	444	339	267,052		74	143	0	0	36,347
22	131	0	0	33,335		75	74	58	58	25,318
23	1,054	873	461	340,236		80	578	487	386	194,883
24	133	0	0	33,823		81	1,122	669	323	338,933
25	608	293	0	169,771		82	870	408	368	263,789
26	579	179	171	166,461		84	443	295	0	127,908
28	353	0	0	89,573		86	669	307	230	199,546
29	63	0	0	16,093		87	385	203	147	117,104
30	583	266	141	170,187		88	450	198	198	136,293
33	91	0	0	23,114		93	554	222	222	165,430
34	214	0	0	54,397		95	159	0	0	40,315
38	239	206	164	81,093		103	71	0	0	18,004
47	142	0	0	36,058		109	97	0	0	24,557

# Figure 3 Existing Revenue Miles Per Route

Figure 4
Proposed Revenue Miles Per Route

Route	Weekday	Saturday	Sun/Hol	Annual	Route	Weekday	Saturday	Sun/Hol	Annual
1	1,013	531	498	314,205	75	335	141	141	100,844
11	627	499	499	214,619	81	1,215	683	592	378,872
13	567	484	484	197,827	82	922	540	500	291,768
15	356	331	229	121,171	84	1,018	776	418	323,586
19	403	346	346	140,872	86	677	448	382	217,899
21	856	506	363	265,056	87	421	287	245	136,253
23	1,184	1,001	600	388,161	88	459	309	271	148,718
25	957	574	383	295,560	93	582	339	233	179,125
26	874	745	401	284,351	102	105	0	0	26,772
30	389	144	135	114,292	103	97	0	0	24,740
33	109	0	0	27,603	105	13	0	0	3,190
38	408	201	147	122,867	106	68	0	0	17,336
51	1,104	671	653	353,800	107	62	0	0	15,850
56	581	536	340	195,426	109	97	0	0	24,597
61	795	483	483	255,572	129	64	0	0	16,139
62	667	323	301	204,104	134	66	0	0	16,695
67	965	797	429	311,885	161	3	0	0	864
68	1,074	887	477	347,104	193	71	0	0	17,993

Figure 3 shows the revenue miles per day and year for the 46 routes in the project, which total 5,932,965 revenue miles per year. Revenue miles would total 6,225,570 per year for the proposed system, as shown in Figure 4.



# 5. Effect on Minority Populations

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. Figure 5 shows minority population density within the SacRT service area.



Figure 5 Minority Population Density

Based on the demographic composition of the ridership of the 46 existing routes in the project, 4,281,802 revenue miles per year (72.2 percent) benefit minority populations and 1,651,163 revenue miles per year (27.8 percent) benefit non-minority populations.

Under the proposed system, of the 6,225,570 revenue miles in the project, 4,498,794 revenue miles per year (72.3 percent) would benefit minority populations and 1,726,776 revenue miles (27.7 percent) would benefit non-minority populations.

# Figure 6 Existing Minority Revenue Miles by Route

Route	Revenue Miles Per Year	Percent Minority	Minority Revenue Miles	Non-Minority Revenue Miles
1	315,554	62.4%	196,950	118,605
2	72,093	76.8%	55,357	16,736
3	24,729	68.8%	17,001	7,728
5	49,304	90.1%	44,443	4,861
6	72,735	75.8%	55,103	17,633
7	15,850	63.2%	10,010	5,839
11	110,154	80.5%	88,721	21,433
13	53,150	74.5%	39,591	13,559
15	193,721	74.7%	144,781	48,940
19	200,998	67.6%	135,935	65,063
21	267,052	61.9%	165,187	101,865
22	33,335	69.4%	23,130	10,205
23	340,236	62.5%	212,494	127,742
24	33,823	61.4%	20,777	13,046
25	169,771	56.6%	96,153	73,617
26	166,461	76.2%	126,876	39,585
28	89,573	50.7%	45,436	44,137
29	16,093	26.1%	4,198	11,895
30	170,187	58.9%	100,312	69,875
33	23,114	70.4%	16,265	6,849
34	54,397	50.0%	27,198	27,198
38	81,093	69.4%	56,288	24,805
47	36,058	85.7%	30,907	5,151
51	335,449	78.5%	263,309	72,140
54	83,664	85.7%	71,712	11,952
55	120,377	87.9%	105,805	14,572
56	198,622	90.9%	180,615	18,007
61	85,951	80.2%	68,892	17,059
62	175,697	71.1%	125,002	50,695
65	101,417	88.8%	90,034	11,384
67	217,863	80.4%	175,180	42,683
68	209,352	83.3%	174,460	34,892
72	126,664	70.9%	89,856	36,808
74	36,347	73.7%	26,782	9,565
74	25,318	60.9%	15,411	9,907
80	194,883	67.9%	132,401	62,482
81	338,933	86.1%	291,797	47,136
82	263,789	65.8%	173,596	90,192
84	127,908	65.1%	83,251	44,658
	199,546	82.5%	164,716	34,830
86 97				
87	117,104	73.1%	85,553	31,551
88	136,293	69.9% 72.2%	95,290	41,003
93 05	165,430	73.3%	121,221	44,210
95	40,315	47.3%	19,058	21,257
103	18,004	30.8%	5,540	12,464
109 Tatal	24,557	37.5%	9,209	15,348
Total	5,932,965	72.2%	4,281,802	1,651,163

# Figure 7 Proposed Minority Revenue Miles by Route

Route	Revenue Miles Per Year	Percent Minority	Minority Revenue Miles	Non-Minority Revenue Miles
1	314,205	62.4%	196,107	118,098
11	214,619	80.5%	172,861	41,758
13	197,827	74.5%	147,361	50,466
15	121,171	74.7%	90,559	30,612
19	140,872	67.6%	95,272	45,600
21	265,056	61.9%	163,952	101,104
23	388,161	62.5%	242,425	145,735
25	295,560	56.6%	167,397	128,163
26	284,351	76.2%	216,731	67,620
30	114,292	58.9%	67,366	46,926
33	27,603	70.4%	19,425	8,179
38	122,867	69.4%	85,284	37,583
51	353,800	78.5%	277,714	76,086
56	195,426	90.9%	177,709	17,717
61	255,572	80.2%	204,847	50,724
62	204,104	71.1%	145,213	58,892
67	311,885	80.4%	250,781	61,104
68	347,104	83.3%	289,253	57,851
72	129,854	70.9%	92,119	37,735
75	100,844	60.9%	61,383	39,461
81	378,872	86.1%	326,181	52,691
82	291,768	65.8%	192,009	99,759
84	323,586	65.1%	210,610	112,976
86	217,899	82.5%	179,866	38,033
87	136,253	73.1%	99,543	36,711
88	148,718	69.9%	103,976	44,741
93	179,125	73.3%	131,255	47,870
102	26,772	76.8%	20,557	6,215
103	24,740	68.8%	17,008	7,731
105	3,190	90.1%	2,876	315
106	17,336	75.8%	13,133	4,203
107	15,850	63.2%	10,010	5,839
109	24,597	37.5%	9,224	15,373
129	16,139	26.1%	4,210	11,929
134	16,695	50.0%	8,348	8,348
161	864	80.2%	692	171
193	17,993	30.8%	5,536	12,457
Total	6,225,570	72.3%	4,498,794	1,726,776

# 6. Effect on Low-Income Populations

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. 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.<sup>2</sup> Figure 8 shows low-income population density within the SacRT service area.

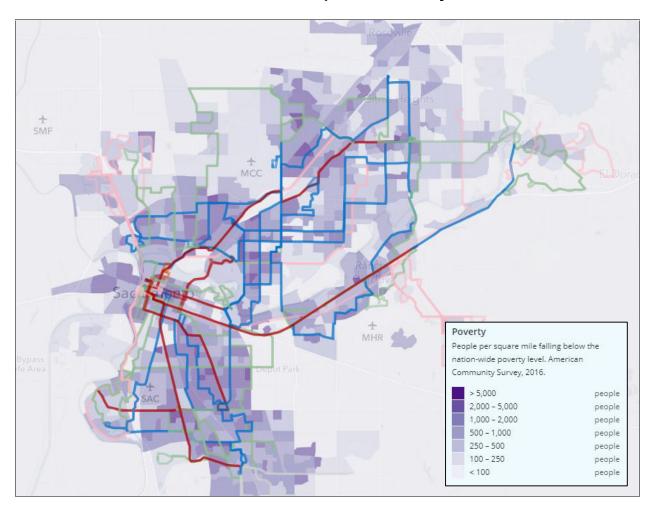


Figure 8 Low-Income Population Density

 $<sup>^2</sup>$  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.

# Regional Transit

Revised Title VI Service Equity Analysis February 18, 2019

# Figure 9 Existing Low-Income Revenue Miles by Route

Route	Revenue Miles Per Year	Percent Low-Income	Low-Income Revenue Miles	Non-Low-Income Revenue Miles
1	315,554	58.7%	185,326	130,229
2	72,093	28.4%	20,481	51,612
3	24,729	4.7%	1,164	23,566
5	49,304	62.3%	30,699	18,605
6	72,735	33.0%	24,034	48,701
7	15,850	0.0%	24,034	15,850
11	110,154	35.2%	38,779	71,375
13	53,150	57.5%	30,546	22,604
15	193,721	66.9%	129,650	64,071
13	200,998	52.9%	106,325	94,673
21		49.8%		
21	267,052	49.8% 55.6%	132,985	134,067 14,816
22	33,335		18,519	
	340,236	64.1%	218,211	122,026
24	33,823	38.2%	12,914	20,909
25	169,771	54.1%	91,886	77,884
26	166,461	67.5%	112,444	54,017
28	89,573	29.5%	26,431	63,142
29	16,093	10.8%	1,733	14,360
30	170,187	37.2%	63,281	106,906
33	23,114	91.7%	21,188	1,926
34	54,397	25.7%	13,988	40,409
38	81,093	43.4%	35,211	45,881
47	36,058	68.8%	24,790	11,268
51	335,449	61.1%	205,072	130,377
54	83,664	57.7%	48,286	35,378
55	120,377	67.3%	80,994	39,383
56	198,622	62.2%	123,451	75,171
61	85,951	50.9%	43,743	42,208
62	175,697	51.3%	90,101	85,596
65	101,417	54.9%	55,656	45,761
67	217,863	64.8%	141,151	76,712
68	209,352	64.6%	135,245	74,107
72	126,664	55.9%	70,743	55,921
74	36,347	40.6%	14,750	21,598
75	25,318	64.7%	16,382	8,936
80	194,883	58.7%	114,388	80,495
81	338,933	58.2%	197,174	141,759
82	263,789	53.8%	141,959	121,830
84	127,908	54.6%	69,824	58,084
86	199,546	50.2%	100,205	99,341
87	117,104	63.8%	74,694	42,411
88	136,293	44.8%	61,097	75,196
93	165,430	62.4%	103,293	62,137
95	40,315	48.8%	19,689	20,626
103	18,004	8.3%	1,500	16,503
109	24,557	11.8%	2,889	21,668
Total	5,932,965	54.8%	3,252,870	2,680,095
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# **Regional Transit** ed Title VI Service Equity An

Revised Title VI Service Equity Analysis February 18, 2019

# Figure 10 Proposed Low-Income Revenue Miles by Route

Route	Revenue Miles Per Year	Percent Low-Income	Low-Income Revenue Miles	Non-Low-Income Revenue Miles
1	314,205	58.7%	184,533	129,672
11	214,619	35.2%	75,555	139,065
13	197,827	57.5%	113,693	84,133
15	121,171	66.9%	81,095	40,076
19	140,872	52.9%	74,519	66,353
21	265,056	49.8%	131,992	133,065
23	388,161	64.1%	248,947	139,214
25	295,560	54.1%	159,968	135,592
26	284,351	67.5%	192,078	92,273
30	114,292	37.2%	42,497	71,795
33	27,603	91.7%	25,303	2,300
38	122,867	43.4%	53,350	69,517
51	353,800	61.1%	216,291	137,509
56	195,426	62.2%	121,465	73,961
61	255,572	50.9%	130,068	125,504
62	204,104	51.3%	104,669	99,435
67	311,885	64.8%	202,066	109,819
68	347,104	64.6%	224,235	122,869
72	129,854	55.9%	72,525	57,329
75	100,844	64.7%	65,252	35,592
81	378,872	58.2%	220,408	158,463
82	291,768	53.8%	157,016	134,752
84	323,586	54.6%	176,644	146,943
86	217,899	50.2%	109,421	108,478
87	136,253	63.8%	86,908	49,346
88	148,718	44.8%	66,666	82,051
93	179,125	62.4%	111,844	67,281
102	26,772	28.4%	7,606	19,166
103	24,740	4.7%	1,164	23,575
105	3,190	62.3%	1,986	1,204
106	17,336	33.0%	5,728	11,607
107	15,850	0.0%	0	15,850
109	24,597	11.8%	2,894	21,704
129	16,139	10.8%	1,738	14,401
134	16,695	25.7%	4,293	12,402
161	864	50.9%	440	424
193	17,993	8.3%	1,499	16,494
Total	6,225,570	55.8%	3,476,357	2,749,213

Based on the demographic composition of the ridership of the 46 existing routes in the project, 3,252,870 revenue miles per year (54.8 percent) benefit low-income populations and 2,680,870 revenue miles per year (45.2 percent) benefit non-low-income populations.

Under the proposed system, of the 6,225,570 revenue miles in the project, 3,476,357 revenue miles per year (55.8 percent) would benefit low-income populations and 2,749,213 revenue miles (44.2 percent) would benefit non-low-income populations.

# 7. Impacts of SacRT Forward Project

As proposed, the SacRT Forward project would redistribute service in a way that would result in a slight increase in the percent of that service that benefits both minority and low-income populations. The percent of revenue miles available to minority riders would increase from 72.2 to 72.3 percent. The percent of service available to low-income riders would increase from 54.8 to 55.8 percent.

	Percent Minority	Percent Low-Income
Existing	72.2%	54.8%
Proposed	72.3%	55.8%

# Figure 11 Summary of Impacts

Based on these results, this analysis finds that *the proposed changes would result in no disparate impacts to minority populations and no disproportionate burdens on low- income populations.* 

# 8. Impacts of Light Rail Headway Improvements

The weekend light rail headway improvements implemented on January 6, 2019 have been evaluated separately from the SacRT Forward project. The headway improvements affected both the Blue Line and the Gold Line. Blue Line weekend ridership is substantially higher percentage minority (81.6 percent) and low-income (65.7 percent) than the SacRT system 69.0 percent and 53.0 percent, respectively); however, Gold Line weekend ridership is slightly lower percentage minority (66.1 percent) and low-income (51.3 percent) than the SacRT system.

Light Rail Rider Demographics							
	Percent Minority	Percent Low-Income					
Blue Line Weekend Ridership	81.6%	65.7%					
Gold Line Weekend Ridership	66.1%	51.3%					
SacRT Systemwide Ridership	69.0%	53.0%					

# Figure 12 Light Rail Rider Demographics

The headway improvements add 76,609 revenue miles to the Blue Line and 56,989 revenue miles to the Gold Line per year. After factoring in the demographic composition of these two lines, the new revenue mileage added to the system is 75.0 percent minority and 59.6 percent low-income, both of which exceed the existing systemwide average. *Therefore, these changes would result in no disparate impacts to minority populations and no disproportionate burdens to low-income populations.* 

Figure 13 Demographics of New Light Rail Service

	New Revenue Miles Per Year	% Minority Ridership	Minority Revenue Miles	% Low-Income Ridership	Low-Income Revenue Miles
Blue Line	76,609	81.6%	62,513	65.7%	50,332
Gold Line	56,989	66.1%	37,670	51.3%	29,235
Total	133,598	75.0%	100,183	59.6%	79,568

FTA Title VI guidance recommends taking multiple service changes into consideration in aggregate. Because both the light rail headway improvements and the SacRT Forward changes are positive to minority and low-income populations with respect to Title VI, this report also finds that *in aggregate, the proposed changes would result in no disparate impacts to minority populations and no disproportionate burdens to lowincome populations.* 

# 2017 Title VI Fare Equity Analysis



Title VI Fare Equity Analysis

November 13, 2017

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# 1. Purpose of Analysis

Pursuant to SacRT'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 SacRT's fare structure.

A draft of this analysis was released on August 1, 2017 for a 30-day public review. On October 5, 2017, a revised draft was issued, which included (1) analysis of an additional fare change (Student Intern Passes), (2) discussion on availability of Connect Cards and reloading capabilities, and (3) updated figures to reflect SacRT's Fiscal Year 2018 budget.

# 2. Project Description

This analysis covers three fare changes:

- <u>Daily Best Connect Card Fare (Daily Best Fare)</u> On March 13, 2017, SacRT authorized, on a temporary six-month basis, a Daily Best Fare for Connect Card users, ensuring that riders who board three or more times using Connect Card pay no more than the daily fare amount (i.e., while preventing them from paying a higher-than-necessary cost to travel). The Daily Best Fare was made broadly available on June 15, 2017, the date the Connect Card system was publicly launched. The Daily Best Fare charges a full fare amount (\$2.75, or \$1.35 discount fare) for the first and second boarding of the day. If the rider chooses to board SacRT a third time during the same service day, the Connect Card system will automatically adjust the fare amount charged to ensure the total daily fare paid by the cardholder does not exceed the price of SacRT's daily pass (\$7.00 or \$3.50 discount fare).
- <u>90-Minute Connect Card Fare (90-Minute Fare)</u> On April 24, 2017, SacRT authorized, on a temporary six-month basis, a 90-Minute Fare for Connect Card users. The 90-Minute Fare was made broadly available on June 15, 2017, the date the Connect Card system was publicly launched. The 90-minute fare is priced the same as SacRT's traditional single ride fare (i.e., \$2.75, or \$1.35 discount fare); however, it entitles the user to unlimited bus and light rail rides during the 90-minute activation period.<sup>1</sup>
- 3. <u>Student Intern Passes</u> On June 15, 2017, SacRT began issuing unlimited ride passes on the Connect Card for high school students participating in the 1,000-Strong internship program through the City of Sacramento. These passes were

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

given away for free to qualifying students, with a maximum of 1,000 students in the program. The pass program was initially established with a six-month duration, but SacRT expects that it will be extended for a second year.

# 3. Title VI Requirements

SacRT 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 reductions lasting up to six months.<sup>2</sup> All three of the proposed changes were implemented on June 15, 2017 for a six-month pilot, with final approval contingent on approval of a Title VI fare equity analysis. December 15, 2017, is therefore the deadline to approve the equity analysis.

Prior to any fare changes being approved permanently, the Board of Directors must approve the findings of a final Title VI fare equity analysis. Prior to approving a final Title VI fare equity analysis, SacRT policy requires that a draft analysis of the proposed changes be made available for a 30-day public review period, that members of the public be invited to comment, and that staff and the Board of Directors take public comments into consideration. In accordance with these requirements, a draft version of this report was published on SacRT's web site on August 1, 2017, which was revised on October 5, 2017, with comment accepted through November 6, 2017.

#### 4. Data and Methodology

<u>On-Board Survey</u> – In April 2013, an on-board passenger survey was conducted on SacRT buses and light rail trains. Passengers on randomly selected trips on all SacRT 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, SacRT 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, SacRT may use special surveys or research to estimate minority and/or low-income utilization rates.

<u>Analysis</u> - Using the demographic data from the 2013 on-board survey, SacRT can estimate the percentage that minority and low-income populations utilize each fare type. This data is combined with the average fare per boarding for each fare type from the

<sup>&</sup>lt;sup>2</sup> See FTA Circular 4702.1B, Chapter IV, Section 7 and RT Fare Change Policies (Resolution No. 15-11-0129).

annual fare survey. SacRT 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 to minority populations, and disproportionate burdens to low-income populations, 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 and the rate of change of the average fare for all low-income riders to that for non-low-income rides, respectively. SacRT's Title VI goal is for the percent increase in average fare for minority or low-income populations to be less than or equal to that for non-minority or non-low-income populations in the case of a net fare increase and equal or greater to that for non-minority or non-low-income populations in the case of a net fare increase and equal statistically significant deficiency from this goal. SacRT 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, SacRT used HHS poverty guidelines from 2013.<sup>3</sup> 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.<sup>4</sup>

#### 5. Baseline Data

Based on Fiscal Year 2018 budget forecasts, SacRT will average \$1.46 in fare revenue per passenger boarding. These figures include a \$1 million deduction for transfer agreement reimbursements to other agencies, 509,768 boardings made by children under age five, and 283,200 boardings made by riders in other minor categories for which SacRT has no demographic data. Excluding these categories, SacRT expects to collect \$31,571,633 in fares over 20,107,397 passenger boardings for an average fare of \$1.57 for riders with known demographic data. These figures are used as a baseline for the remainder of this analysis.

<sup>&</sup>lt;sup>3</sup> 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 2017.

<sup>&</sup>lt;sup>4</sup> 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 Minority Ridership Statistics – FY 2018

	Fare Revenue		Boarding	Boardings		
	Amount	%	Amount	%	Fare	
Minority Non-Minority Subtotal	\$20,527,245 <u>\$11,044,388</u> \$31,571,633	65.0% <u>35.0%</u> 100.0%	13,411,914 <u>6,695,483</u> 20,107,397	66.7% <u>33.3%</u> 100.0%	\$1.53 \$1.65 \$1.57	
Non-Classified	<u>(\$1,000,000)</u>		<u>892,603</u>			
Total	\$30,571,633		21,000,000		\$1.46	

Minority riders make up an estimated 66.7 percent of SacRT ridership and pay an estimated 65.0 percent of fares. They pay an average of \$1.53 per boarding, compared to \$1.65 for non-minority riders. Low-income riders make up an estimated 46.1 percent of SacRT fixed-route ridership and pay an estimated 42.7 percent of fares. They pay an average of \$1.45 per boarding compared to \$1.67 for non-low-income riders.

#### Figure 2 Baseline Low-Income Ridership Statistics – FY 2018

	Fare Revenue		Boardings	Boardings		
	Amount	%	Amount	%	Fare	
Low-Income Non-Low-Income Subtotal	\$13,468,942 <u>\$18,102,691</u> \$31,571,633	42.7% <u>57.3%</u> 100.0%	9,271,211 <u>10,836,186</u> 20,107,397	46.1% <u>53.9%</u> 100.0%	\$1.45 \$1.67 \$1.57	
Non-Classified	<u>(\$1,000,000)</u>		<u>892,603</u>			
Total	\$30,571,633		21,000,000		\$1.46	

Baseline fare revenue, passenger boardings, and average fare forecasts for Fiscal Year 2018 are provided for each major fare type in Figure 3.

# Figure 3 Ridership and Fare Revenue By Fare Type – FY 2018 Forecasts

Fare Type	Face Value	Fare Revenue	Boardings	Average Fare
Single Cash - Bus	\$2.75	\$1,847,906	671,966	\$2.75
Single Ticket - Bus	\$2.75	\$498,374	181,227	\$2.75
Single Cash - Rail	\$2.75	\$1,191,770	619,239	\$1.92
Single Ticket - Rail	\$2.75	\$1,559,516	810,318	\$1.92
Disc Single Cash - Bus	\$1.35	\$620,635	459,730	\$1.35
Disc Single Tkt - Bus	\$1.35	\$109,675	81,241	\$1.35
Disc Single Cash - Rail	\$1.35	\$155,494	140,318	\$1.11
Disc Single Tkt - Rail	\$1.35	\$203,506	183,644	\$1.11
Daily Pass	\$7.00	\$4,837,000	3,102,596	\$1.56
Disc Daily Pass	\$3.50	\$1,882,045	1,665,238	\$1.13
Monthly Pass	\$110.00	\$9,327,817	3,478,742	\$2.68
Semi-Monthly Pass	\$60.00	\$312,454	140,158	\$2.23
Student Semi-Monthly	\$27.50	\$755,239	691,002	\$1.09
Senr/Disb Monthly/Semi	\$55.00	\$1,964,881	2,090,447	\$0.94
Los Rios		\$2,300,000	2,713,635	\$0.85
CSUS		\$822,387	735,249	\$1.12
DHA		\$1,936,200	858,033	\$2.26
Fare Evader		\$0	608,018	\$0.00
Lifetime		\$0	163,675	\$0.00
Mobile Single	\$2.75	\$482,183	250,540	\$1.92
Mobile Daily	\$7.00	\$123,116	79,088	\$1.56
Mobile Disc Single	\$1.35	\$50,792	45,835	\$1.11
Mobile Disc Daily	\$3.50	\$32,785	29,008	\$1.13
G1 Employee Pass		\$500,000	283,200	\$1.77
Round Trip (Special Event)	\$5.50	\$46,693	16,979	\$2.75
Round Trip (Discount Spec Event)	\$2.75	\$11,166	8,273	\$1.35
Subtotal		\$31,571,633	20,107,397	\$1.57
Child		\$0	509,768	\$0.00
Other Boardings		\$0	382,835	\$0.00
Transfer Agreements		(\$1,000,000)	n/a	n/a
Total		\$30,571,633	21,000,000	\$1.46

# 6. Demographics of New Fares

Due to the recent launch of the Connect Card, demographic data on cardholders would likely be skewed toward participants in the voluntary "soft launch" program, who likely do not represent the average Connect Card user once the card is more widely distributed. For this analysis, staff has therefore used demographics from existing users of traditional fares who are expected to convert to Connect Card, in lieu of data collected directly from Connect Card users.

Users of the new Daily Best Fare are expected to be drawn entirely from existing daily pass users, which are 75.5 percent minority and 59.6 percent low-income (with similar figures for the discount daily pass). Users of the 90-Minute Fare are expected to be drawn largely from existing daily pass users, but also from existing single ride and monthly pass users. Based on expected use of the 90-Minute Fare by each of these groups, users of the 90-Minute Fare are expected to be 72.5 percent minority and 53.8 percent low-income. The discount 90-Minute Fare is expected to have similar minority utilization but slightly higher low-income utilization at 58.5 percent. Demographics for the Student Intern Pass are assumed to match those for existing student semi-monthly pass users, which are 87.0 percent minority and 63.8 percent low-income, both well above systemwide averages.

Based on this analysis, all five new fare types are expected to have greater minority and low-income utilization than the overall SacRT system, which has 66.7 percent minority and 46.1 percent low-income utilization.

Fare Type	% Minority	% Low- Income	Minority/ Low-Income Fare Type
Daily Best Fare - Full Daily Best Fare - Disc 90m Ticket Connect Card - Full 90m Ticket Connect Card - Disc Student Intern Pass	75.5% 75.2% 72.5% 72.6% 87.0%	59.6% 60.7% 53.8% 58.5% 63.8%	Yes Yes Yes Yes Yes
SacRT System (Baseline)	66.7%	46.1%	

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

# 7. Sales and Ridership Forecasts

Based on projections of existing sales data for the new fare types collected during the six-month Connect Card pilot period and available at the time of preparation of this report, all of the new fare types combined are expected to total \$1,002,219 in sales and 743,158 boarding passengers per year. The most heavily-used type is expected to be the full-priced 90-Minute Fare, at \$703,165 in sales per year.

Fare Type	Minority/Low -Income Fare Type	Fare Revenue	Boardings	Average Fare
Daily Best Fare - Full	Yes	\$143,458	96,180	\$1.49
Daily Best Fare - Disc	Yes	\$26,957	24,312	\$1.11
90-Minute Fare - Full	Yes	\$703,165	479,082	\$1.47
90-Minute Fare - Disc	Yes	\$128,639	120,899	\$1.06
Student Intern Pass	Yes	\$0	22,684	\$0.00
Subtotal - New fares	Yes	\$1,002,219	743,158	\$1.35
Baseline - SacRT System	n/a	\$31,571,633	20,107,397	\$1.57

Figure 5 Sales and Ridership Forecasts for New Fare Types

Collectively, the average fare for the new fare types is expected to be \$1.35 per boarding, approximately 14 percent less than SacRT's existing systemwide average of \$1.57.

Daily Best Fare ridership is expected to come primarily from existing users of SacRT's prepaid daily passes. Approximately 15 percent of existing daily pass boardings are made using a prepaid pass (with the remainder being purchased at the time of boarding from the bus farebox or a light rail fare vending machine). SacRT expects that all existing prepaid daily pass users will become Connect Card users, due to retirement of the existing prepaid daily passes, but that only approximately 20 percent will continue to use a daily pass, in the form of the Daily Best Fare, with the remaining 80 percent taking advantage of the new 90-Minute Fare to make multiple-seat rides at a lower out-of-pocket price.<sup>5</sup>

<sup>&</sup>lt;sup>5</sup> For example, a rider making a round trip using two buses each direction would formerly pay \$7.00 for a daily pass and would, under the proposed change, be allowed to pay \$2.75 in each direction for two 90-Minute Tickets, paying a total of \$5.50 for his/her round trip, saving \$1.50.

Fare Type	Before	After	Change
Existing Fares			
Single Cash - Bus	\$1,847,906	\$1,838,043	(\$9,863)
Single Ticket - Bus	\$498,374	\$495,714	(\$2,660)
Single Cash - Rail	\$1,191,770	\$1,182,681	(\$9,089)
Single Ticket - Rail	\$1,559,516	\$1,547,623	(\$11,893)
Disc Single Cash - Bus	\$620,635	\$617,323	(\$3,312)
Disc Single Tkt - Bus	\$109,675	\$109,089	(\$585)
Disc Single Cash - Rail	\$155,494	\$154,483	(\$1,011)
Disc Single Tkt - Rail	\$203,506	\$202,183	(\$1,323)
Daily Pass	\$4,837,000	\$3,910,397	(\$926,603)
Disc Daily Pass	\$1,882,045	\$1,711,576	(\$170,469)
Monthly Pass	\$9,327,817	\$9,191,661	(\$136,156)
Semi-Monthly Pass	\$312,454	\$303,477	(\$8,977)
Student Semi-Monthly	\$755,239	\$726,389	(\$28,850)
Senr/Disb Monthly/Semi	\$1,964,881	\$1,952,608	(\$12,273)
New Fares			
Daily Best Fare - Full	\$0	\$143,458	\$143,458
Daily Best Fare - Disc	\$0	\$26,957	\$26,957
90-Minute Fare - Full	\$0	\$703,165	\$703,165
90-Minute Fare - Disc	\$0	\$128,639	\$128,639
Student Intern Pass	\$0	\$0	\$0
Total	\$25,266,312	\$24,945,467	(\$320,845)

# Figure 6 Expected Change in Sales

Ridership on the 90-Minute Fare is expected to come from multiple sources. The largest single source is expected to be existing prepaid daily pass users who find the 90-Minute Fare more advantageous than a Daily Pass; however, a small fraction of Monthly Pass users are also expected to transition to 90-Minute Fares in cases where they provide a better value.

Customers regularly making a two-seat ride and riding between fifteen and twenty days per month are likely to convert from a Monthly Pass to the 90-Minute Fare. Customers regularly making a two-seat ride but riding fewer than fifteen days per month are also likely to convert to the 90-Minute Fare, but from a Daily Pass rather than a Monthly Pass.

A small number of riders are also assumed to occasionally be making a two-seat ride *without* a return trip on transit, and therefore paying \$5.50 for their one-way journey (i.e.,

paying the \$2.75 single fare twice). The 90-Minute Fare would allow these riders to avoid paying their second single fare of \$2.75, allowing them to achieve a 50 percent savings on their out-of-pocket cost to take transit.

Ridership on the Student Intern Pass is based on three months of actual use statistics. As of September 2017, approximately 500 passes have been distributed and approximately 215 have been used at least once.

# 8. Net Sales and Ridership Impacts

The new 90-Minute Fare and Daily Best Fare types primarily impact Daily Pass users, with a small impact on Monthly Pass users. For this analysis, net sales and ridership impacts are estimated by assuming a Connect Card adoption rate, as well as assumed conversion rates from existing pass users to the new fare types. The tables below provide details on the changes that are expected to occur to each existing and new fare categories.

Fare Type	Before	After	Change
Existing Fare Types			
Single Cash - Bus	671,966	668,606	(3,360)
Single Ticket - Bus	181,227	180,321	(906)
Single Cash - Rail	619,239	616,143	(3,096)
Single Ticket - Rail	810,318	806,267	(4,052)
Disc Single Cash - Bus	459,730	457,431	(2,299)
Disc Single Tkt - Bus	81,241	80,834	(406)
Disc Single Cash - Rail	140,318	139,617	(702)
Disc Single Tkt - Rail	183,644	182,726	(918)
Daily Pass	3,102,596	2,621,693	(480,902)
Disc Daily Pass	1,665,238	1,543,675	(121,562)
Monthly Pass	3,478,742	3,409,167	(69,575)
Semi-Monthly Pass	140,158	135,953	(4,205)
Student Semi-Monthly	691,002	664,863	(26,139)
Senr/Disb Monthly/Semi	2,090,447	2,079,995	(10,452)
New Fare Types			
Daily Best Fare - Full	0	96,180	96,180
Daily Best Fare - Disc	0	24,312	24,312
90-Minute Fare - Full	0	479,082	479,082
90-Minute Fare - Disc	0	120,899	120,899
Student Intern Ticket	0	22,684	22,684
Total	14,315,864	14,330,448	14,584

#### Figure 7 Expected Change in Boardings

# 9. Impact on Average Fare

Users of the Daily Best Fare, who are expected to consist entirely of current Daily Pass users, will not see any change in their average fare per boarding. Users of the 90-Minute Fare are expected to come from a variety of existing fare types with an overall average fare of \$2.05 per boarding. These riders are expected to experience a \$0.67 reduction (33 percent) in their average fare per boarding to \$1.38. Discount 90-Minute Fare users are expected to see a similar 31 percent reduction in average fare. Users of the Student Intern Pass will see a 100 percent reduction in average fare, since they will be riding for free.

New Fare Type	Old Average Fare	New Average Fare	Change	% Change	Minority/ Low-Income Type?
Daily Best Fare - Full	\$1.49	\$1.49	\$0.00	0%	Yes
Daily Best Fare - Disc	\$1.11	\$1.11	\$0.00	0%	Yes
90-Minute Fare - Full	\$2.05	\$1.38	-\$0.67	-33%	Yes
90-Minute Fare - Disc	\$1.44	\$1.00	-\$0.44	-31%	Yes
Student Intern Pass	\$1.09	\$0.00	-\$1.09	-100%	Yes

#### Figure 8 Changes in Average Fare For Users of New Fare Types

All five proposed fare types are expected to have greater than average minority and low-income utilization and users of all five types are expected to benefit from or be unaffected by the proposed fare changes.

# **10. Systemwide Average Fare Impacts**

If the proposed changes are approved, SacRT is expected to average \$1.44 in fare revenue per passenger boarding for Fiscal Year 2018, a reduction of \$0.02 from the baseline estimate of \$1.46. For categories with known demographic data, where the existing average fare is \$1.57, the proposed average fare would decrease to \$1.55 per boarding.

#### Figure 9 Impact of New Fares On Systemwide Minority Average Fare

	Fare Revenue		Boardings	Boardings		
	Amount	%	Amount	%	Fare	
Minority Non-Minority Subtotal	\$20,290,847 <u>\$10,959,941</u> \$31,250,789	64.9% <u>35.1%</u> 100.0%	13,422,496 <u>6,699,485</u> 20,121,981	66.7% <u>33.3%</u> 100.0%	\$1.51 \$1.64 \$1.55	
Non-Classified	<u>-\$1,000,000</u>		<u>892,603</u>			
Total	\$30,250,789		21,014,584		\$1.44	

Under the proposed changes, minority riders would continue to pay less per boarding (\$1.51) than non-minority riders (\$1.64).

Figure 10 Impact of New Fares On Systemwide Low-Income Average Fare

	Fare Revenue		Boardings	Boardings		
	Amount	%	Amount	%	Average Fare	
Low-Income Non-Low-Income Subtotal	\$13,292,852 <u>\$17,957,936</u> \$31,250,789	42.6% <u>57.5%</u> 100.0%	9,279,309 <u>10,842,672</u> 20,121,981	46.1% <u>53.9%</u> 100.0%	\$1.43 \$1.66 \$1.55	
Non-Classified	<u>-\$1,000,000</u>		<u>892,603</u>			
Total	\$30,250,789		21,014,584		\$1.44	

Low-income riders would also continue to pay less (\$1.43) than non-low-income riders (\$1.66).

# **11. Comparison of Impacts**

Compared to baseline expectations, minority, non-minority, low-income, and non-lowincome riders would all see a reduction in average fare; however, the reduction would be greater for minority populations than for non-minority populations and the reduction would be greater for low-income populations than from non-low-income populations.

Rider Type	Existing	Proposed	Change	% Change
All	\$1.570	\$1.553	-\$0.017	-1.088%
Minority	\$1.531	\$1.512	-\$0.019	-1.230%
Non-Minority	\$1.650	\$1.636	-\$0.014	-0.824%
Low-Income	\$1.453	\$1.433	-\$0.020	-1.394%
Non-Low-Income	\$1.671	\$1.656	-\$0.014	-0.859%

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



# 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

a. Percent decrease in non-minority avg fare	-0.82%
b. Threshold of statistical significance(80% * a)	-0.66%
c. Percent decrease in minority avg fare	-1.23%
d. Do fares decrease more for non-minority populations? ( a < c )	No
e. Is there evidence of a potential disparate impact ( $c > b$ )	No
f. Percent decrease in non-low-income avg fare	-0.86%
g. Threshold of statistical significance ( 80% * f )	-0.69%
h. Percent decrease in low-income avg fare	-1.39%

i. Do fares decrease more for non-low-income populations? (f < h) No j. Is there evidence of a potential disproportionate burden? (h > g) No

Per SacRT 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 benefit minority populations more than nonminority populations; 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 also expected to benefit low-income populations more than non-low-income populations; therefore, this analysis finds *that there are no potential disproportionate burdens on low-income populations as a result of the proposed fare changes.* 

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# Introduction

This appendix discusses availability of the Connect Card and compares Connect Card availability to that of traditional paper media fare types. Connect Card offers benefits to users compared to traditional paper media, in particular, a 90-minute unlimited ride fare. Because this fare type is not available on traditional paper media, it is important that Connect Card be available to minority and low-income populations. This appendix examines the availability of Connect Card and traditional paper media through SacRT's sales outlets, as well as by mail, telephone, internet orders, and other means. This appendix also reviews efforts by SacRT to reduce language barriers to Connect Card use.

# Sales Outlets

Approximately two thirds of SacRT's fare revenue comes from pre-paid sales at nearly 180 outlets, with the remaining third coming from same-day sales on the bus and light rail system. In addition to these sales outlets, SacRT also receives a small amount of fare revenue through individual mail/telephone orders.

Of SacRT's 180 outlets, 145 are major employers, high schools, or similar entities that sell SacRT fare media to private groups of customers (Corporate Accounts). The remaining 35 outlets are open to the general public, e.g., through retailers such as Raley's and Bel Air stores (Retail Outlet or Outlets), although four are located outside of Sacramento County, and primarily cater to customers of other transit agencies that honor SacRT tickets and passes. Retail Outlets are the primary concern of this analysis.

#### Traditional Paper Media Retail Outlets

Traditional paper fare media is currently sold at thirteen Retail Outlet locations in Sacramento County, as shown in the table below and on the map in Figure A-1. These Retail Outlets consist primarily of small retailers, grocery stores, and government offices that sell tickets and passes to the public.

Historically, Raley's and Bel Air supermarkets had been outlets for SacRT fare media; however, prior to the launch of the Connect Card system in June of 2017, SacRT was notified by Raley's/Bel-Air that they intended to discontinue sales of paper fare products at their locations, due to increasing concern with inventory risk and the monthly reconciliation process of paper fare media. Loss of the Raley's and Bel Air locations reduced the number of traditional paper media sales outlets by fourteen.

# **Transit** Draft Title VI Fare Equity Analysis

Draft Title VI Fare Equity Analysis November 13, 2017 Appendix A – Connect Card Availability

Name	Address
City of Citrus Heights	6360 Fountain Square Drive
City of Davis Recreation Dept	23 Russell Boulevard (Davis)
City of Elk Grove	8401 Laguna Palms Way
City of Rancho Cordova	2729 Prospect Park Drive
E&S Check Cashing	1810 Del Paso Boulevard
Fast & Easy	2101 El Camino Avenue
Just Send It Postal	7889 Lichen Drive
Just Send It Postal	7909 Walerga Road #112
Punjab International	2238 Florin Road
Rancho Check Cashing	10248 Mills Station Road
RT Customer Service Center	1225 R Street
Sacramento Natural Foods Co-op	2820 R Street
Save Mart	9160 Elk Grove Florin Road
SMUD	6301 S Street
Woodland City Hall Utilities Dept	300 1st Street (Woodland)
Yolo County Transportation District	350 Industrial Way (Woodland)

# Traditional Paper Media Retail Sales Outlets

\* Outlet location outside of Sacramento County

# **Connect Card Retail Outlets**

Connect Cards are currently sold and/or reloaded at eighteen Retail Outlet locations within Sacramento County, as shown in the table below and on the map in Figure A-2. Each of these locations accepts cash, a credit/debit card, or a check as a method of payment. Fourteen of the locations consist of Raley's or Bel Air supermarkets. Although Raley's/Bel Air opted to discontinue sales of traditional paper SacRT media, SacRT staff was successful in negotiating for Raley's/Bel Air to sell and reload Connect Cards, which alleviates the inventory risk and monthly paper work that prompted Raley's/Bel Air to discontinue paper media sales.

Compared to traditional paper media outlets, Connect Card outlets include fewer small retailers, because SacRT has thus far focused on enlisting larger chains (such as Raley's/Bel Air) as Connect Card outlets, to maximize Connect Card availability throughout the region. Raley's/Bel Air is the first major chain to be established as a Connect Card outlet. Staff is now pursuing other partnerships to enlarge the network of Connect Card outlets.

# Transit Regional Transit

Draft Title VI Fare Equity Analysis November 13, 2017 Appendix A – Connect Card Availability

Name	Address	
Bel Air	1540 West El Camino Avenue	
Bel Air	6231 Fruitridge Road	
Bel Air	7465 Rush River Drive #200	
Bel Air	4320 Arden Way	
Bel Air	4005 Manzanita Avenue	
Bel Air	2155 Golden Centre Lane	
Bel Air	5100 Laguna Boulevard	
Bel Air	8425 Elk Grove Florin Road	
Bel Air *	1039 Sunrise Boulevard (Roseville)	
Bel Air	7901 Walerga Road	
Bel Air	2760 East Bidwell Street	
Bel Air	1301 Florin Road	
City of Elk Grove	8401 Laguna Palms Way	
City of Folsom	50 Natoma St	
El Dorado Transit *	6565 Commerce Way (Diamond Springs)	
North Natomas TMA	1918 Del Paso Road #100	
Placer County Transit *	11432 F Ave., Building 420A (Auburn)	
Raley's	8391 Folsom Boulevard	
Raley's	4900 Elk Grove Boulevard	
Raley's	25025 Blue Ravine Road	
Roseville Transit *	316 Vernon St, Suite 150 (Roseville)	
RT Customer Service Center	1225 R Street	
South County Transit *	140 Enterprise Ct., Suite B (Galt)	
Yolo County Transportation District *	350 Industrial Way (Woodland)	
Yuba-Sutter Transit *	2100 B Street (Marysville)	

# Connect Card Retail Sales Outlets

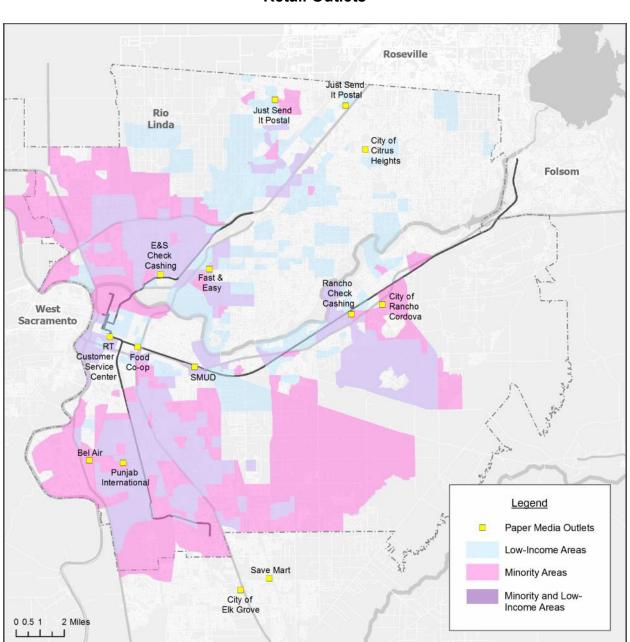
\* Outlet location outside of Sacramento County

# Geographic Distribution of Retail Outlets

Figures A-1 and A-2 show the locations of traditional paper media outlets and Connect Card outlets on a map of Sacramento's service area and nearby areas. Each map includes an overlay indicating minority and low-income areas. Retail Outlets are spread out geographically throughout the SacRT service area, including minority and non-minority neighborhoods as well as low-income and non-low-income neighborhoods. One additional benefit that Connect Card Retail Outlet locations provide is that 100 percent of all SacRT fare types are available for sale at these locations as well as the transit fare media of other participating Connect Card agencies. In contrast, many of paper media outlets sell only a subset of SacRT's traditional paper media products.

# **Regional Transit**

Draft Title VI Fare Equity Analysis November 13, 2017 Appendix A – Connect Card Availability



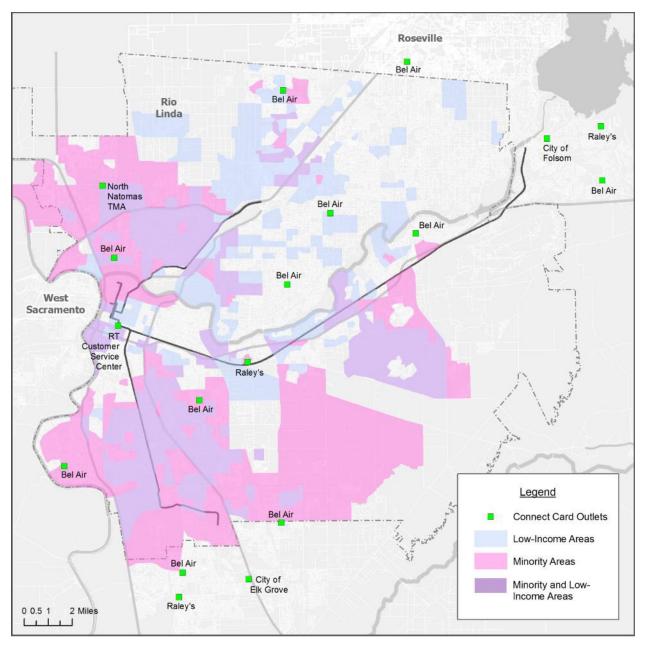
SacRT currently has thirteen Retail Outlets that sell traditional paper media within Sacramento County. An additional three paper media Retail Outlets exist outside Sacramento County. Demographic overlays are for the SacRT service area only.

Figure A-1 Traditional Paper Media Retail Outlets

# **Regional Transit**

Draft Title VI Fare Equity Analysis November 13, 2017 Appendix A – Connect Card Availability





SacRT currently has eighteen Retail Outlets that sell or reload Connect Cards within Sacramento County. An additional seven Connect Card outlets are located outside Sacramento County, including one in Roseville, which appears on the map. Demographic overlays are for the SacRT service area only.

#### Corporate Account Network

One of the long-term goals of the Connect Card project is to transition 100 percent of Corporate Account sales from paper fare media to Connect Card. This process has been under way throughout 2017 and will continue gradually, as organizations are ready to transition. SacRT staff has reached out to virtually all of our Corporate Accounts and has offered training to them as they prepare to transition. Additionally, SacRT hosted two open houses in May where approximately 50 organizations went through a training and question-and-answer session. At this point, staff has transitioned approximately 10-15 percent of Corporate Accounts from paper fares to Connect Card.

#### Mail/Telephone/Online Orders

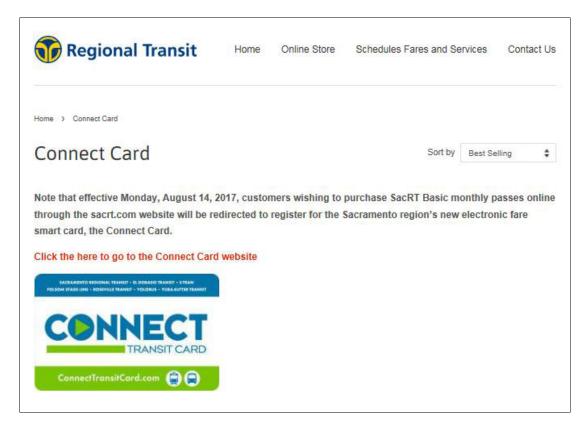
In Fiscal Year 2017, SacRT sold over \$250,000 in fare revenue through mail, telephone, and online sales channels. Although this is the preferred sales channel for some SacRT customers, this amount represents less than 1 percent of total fare revenue.

SacRT has begun transitioning online sales from paper fare media to Connect Card through a voluntary process by notifying customers of the new system through the mail. Beginning in August of 2017, SacRT began redirecting basic monthly pass purchasers to the Connect Card website. SacRT intends to transition online discount sticker sales to Connect Card as well, but additional work is needed because discount fare types on the Connect Card require a photo of the customer. Staff will be modifying the Connect Card website to allow for discount applications to be filed online in an effort to simplify the application process for our customers.

In addition to online sales, SacRT has also begun transitioning mail and telephone orders from paper fare media to Connect Card. Customers have been notified by mail of the new system and transition timeline. After a to-be-determined cut-over point, customers ordering fare media by mail or telephone will be mailed a Connect Card instead of paper fare media. For these customers, no change to the ordering process will be visible. The only change these customers will experience is that instead of receiving a paper pass or sticker in the mail, they will receive a pre-loaded Connect Card (along with instructions for use, reload, etc.). This will have the effect of gradually increasing availability of Connect Card as well.

#### **Regional Transit** Draft Title VI Fare Equity Analysis November 13, 2017 Appendix A – Connect Card Availability

# **Online Store Screenshot**



# **Connect Card Transition Plan**

SacRT has a five-step plan for expanding Connect Card availability to the general public:

- 1. Raley's/Bel-Air
- 2. Remaining Retail Outlets
- 3. New Retail Outlets
- 4. New light rail fare vending machines
- 5. Further expansion through Connect Card upgrades

The first step was to target Raley's/Bel-Air for Connect Card sales, for two significant reasons. First, SacRT would have entirely lost Raley's/Bel-Air as an account had they not transitioned from paper media to Connect Card, as explained above. Second, the fourteen Raley's/Bel-Air locations provided SacRT with the quickest way to achieve a large network of outlets, as no other retail partner currently has more than two sales locations.

Steps 2 and 3 of the transition plan will occur concurrently. Step 2 is to work with remaining Retail Outlet locations to bring Connect Card sales online one at a time. Step 3 is to enlist new Retail Outlets that can offer multiple locations. Staff has been in contact with multiple retail chains that could improve geographic coverage within the SacRT service area.

SacRT has also begun working on Step 4. A potential funding source has been identified that would allow SacRT to replace approximately 60 of its 110 light rail Fare Vending Machines. These new machines would allow for the distribution and reloading of Connect Cards directly on the light rail platform, dramatically improving the availability of the Connect Card. It would also facilitate the loading of small amounts of cash onto a card, for customers who lack the ability or inclination to load large dollar amounts in advance.

During Step 5, SacRT will investigate changes to the business model for Connect Card that could make it possible for Connect Cards to be distributed and reloaded virtually anywhere (e.g., like a restaurant gift card).



#### Connect Card Spanish Language Car Card

# Language Assistance

In order to maximize accessibility to the Connect Card and promote its use by Limited English Proficiency (LEP) populations, SacRT is undertaking several additional efforts.

First, interior car cards have been translated into Spanish and will be installed in buses and trains. Second, brochures on the Connect Card have also been translated into Spanish, and will be circulated in the fleet and at special events. Finally, the Connect Card vendor has been engaged to embed Google Translate service into the Connect Card web site, which will provide translation into over 80 languages.

# Regional Transit

Draft Title VI Fare Equity Analysis November 13, 2017 Appendix A – Connect Card Availability

#### Connect Card Spanish Language Brochure



El programa de cuentas corporativas de Connect Card permite que los empleadores: Ofrezcan subsidios y pases para el transporte pública como beneficio para los empleados.

- Usen una gestión simple de cuentas en línea
- Configuren una carga automática para los pases mensuales y el valor en electivo.
- pades mensuales y el valor en eticavo, 6 Recibion uno única factará mensual combinada de todas las agencias regionales de transporte público. 5 es beneficien de las deducciones de nómina antes de impuestos.

Para obtener más información sobre el programa de cuentos corporativos de Connect Card, envie un correo electrónico a corpraleveliconnectransiticard.com o llame al (916) 321-2877.

# Si ve que la pantella se pone roja y escucha un tono de alta fracuencia, no tiene una turila vidida de tenancer público, y a apoyo la tarjete o la Connec Carti se bloque o datió. Si no debe por qui no functiona su Connec Card, debe por qui no functiona y Connec Card a Connec Carti al 1916;321,2877 o deligan a Centro de altanción a la clante de alguno agencia participante de transporte público.

CÓMO ENTENDER LOS LECTORES DE TARJETAS

De l'Arabetras Liste para viajar: cuando apoye y mantenga la tarjeta contre el punto amarillo, veró que la pantalía se toma verde o amarilla (según el tipo de tarjeta) e secuchará un pritido de confirmación cuando se acepte el pago.

CÓMO USAR SU TARJETA Connect Card usa una tecnología de tarjeta inteligente para almacenar los pases y el valor en electivo. Las Connect Cards pueden recorgarse y reutilizarse, por lo que no debe tirañas. No doble la tarjeta ni la perfore, y o esto puede dañarla.

Consultar el saldo de valor en efectivo
Informar la pérdida/el robo de su tarjeta y solicitar un reemplazo

Estas beneficios están disponibles únicamente para los titulares de tarjetos registradas. Para registrares en línea, ingrese en Convectinantificará com. Si colífica para una tarjeto con descuento, debe dingines d'Cartor de atención al cliente de alguno agencia participante de transporte público y presentar evidencias de su elegibilidad.

No puede dividir un pago y pagar una parte con el valor en efectivo de la Connect Card y atra parte con efectivo que tenga a mano.

#### PASE DIARIO

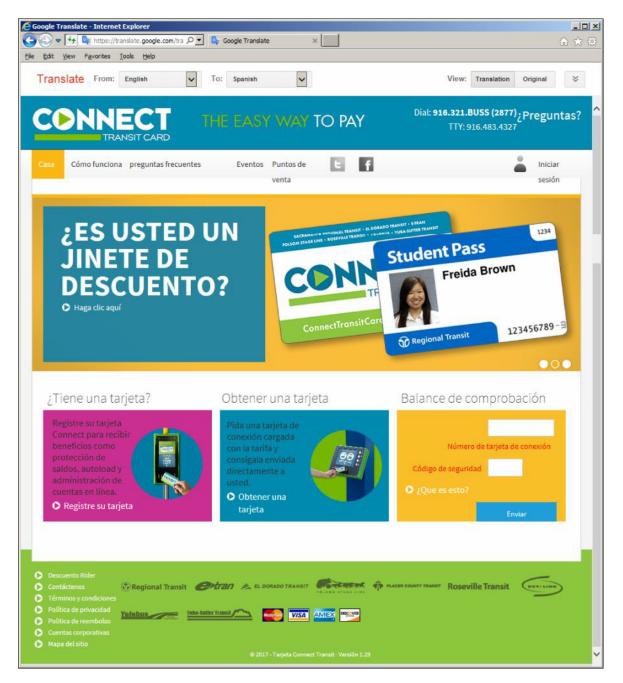
Passo butario Puede padrie al operador del autobús, al subirse o presionar el botan Pasa diario del lactor de Connect Card del ferrocarti ligero antes de apoyar la tarjeta, que la cargue un pasa diario en la Connect Card, vélide en las agencias participantes de transporte público.

Puede comprar un pase diario con el saldo en valor en efectivo de la Connect Card.

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#### Example Google-Translated Spanish Language Connect Card Web Site



SacRT is working with the Connect Card vendor to embed Google Translate into the Connect Card web site, allowing free instant translation.

Appendix I

**Service Standards** 

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#### RESOLUTION NO. 13-08-0124

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

#### August 26, 2013

#### REPEALING AND RESTATING SACRAMENTO REGIONAL TRANSIT DISTRICT SERVICE STANDARDS

WHEREAS draft Service Standards were released on RT's web site for public review on February 28, 2013, with revisions released on July 1, 2013; and

WHEREAS the draft Service Standards were publicized on RT's web site, in RT's passenger newsletter, in RT bus and light rail vehicles, at major stops and stations, via email announcements, and in traditional newspapers; and;

WHEREAS key materials were translated and provided in five major non-English languages widely spoken by persons with Limited English Proficiency residing in RT's service area and likely to use RT's service; and;

WHEREAS comments were accepted from members of the public for a period exceeding 30 calendar days, for both the initial and revised drafts, including public hearings held before the RT Board of Directors on March 25, 2013 and on July 22, 2013; and

WHEREAS the Board of Directors has considered the Service Standards set forth in Exhibit A, has considered public comments, and is aware of RT's requirements under Title VI of the Civil Rights Act of 1964 with regards to service standards and policies;

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

THAT, Resolution 01-09-0193 is hereby repealed; and

THAT, the Board of Directors of the Sacramento Regional Transit District hereby adopts Service Standards as set forth in Exhibit A.

PATRICK HUME, Chair

ATTEST:

MICHAEL R. WILEY, Secretary

By 607 Cindy Brooks, Assistant Secretar

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Exhibit A



Service Standards

August 26, 2013

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Service Standards

# **1. INTRODUCTION**

It is the policy of the Sacramento Regional Transit District (RT) to provide quality service to all customers regardless of race, color, national origin, or income. This document establishes service standards and related policies for RT's fixed-route transit service.<sup>1</sup> In addition to serving as a guide for staff and stakeholders, this document is intended to satisfy Title VI of the Civil Rights Act of 1964, Executive Order 12898, and related civil rights laws, which help assure that RT's services are provided in a non-discriminatory manner, specifically with regards to minority populations and low-income populations.

The Federal Transit Administration (FTA) requires RT to establish the following four service standards and two service policies:<sup>2</sup>

- Vehicle Loading Standards
- Productivity Standards (Headway Standard)
- On-Time Performance Standards
- Service Area Coverage Standards
- Vehicle Assignment Policy
- Transit Amenity Distribution Policy

Title VI requires RT, at least every three years, to prepare a Service Monitoring report that evaluates the fixed-route transit system against RT's service standards and policies on a route-by-route basis, broken down by minority and non-minority routes. Although not a Title VI requirement, RT includes low-income populations in this analysis as well.

This document also sets forth guidelines for RT's quarterly performance monitoring program, which was recommended by RT's 2012 TransitRenewal study and which provides a regular process for improving the productivity of RT's system.

### 2. TITLE VI SERVICE MONITORING

#### Requirements

At least once every three years, RT is required to prepare a Title VI Service Monitoring report that evaluates the fixed-route transit system against RT's service standards on a route-by-route basis, broken down by minority and non-minority routes.<sup>3</sup> RT is required to have a policy for identifying and correcting disparate impacts on minority populations and to submit to FTA a copy of the resolution verifying the RT Board's consideration,

<sup>&</sup>lt;sup>1</sup> This document does not cover RT's complementary paratransit service.

<sup>&</sup>lt;sup>2</sup> See FTA Circular 4702.1B, Chapter 4, Section 4. Service policies, as defined in the FTA circular, differ slightly from service standards; however, both are treated identically under the Title VI Service Monitoring program and are meant to be developed and enforced as part of a single program. For the sake of clarity and brevity, this document normally refers to service standards and service policies collectively as simply service standards.

<sup>&</sup>lt;sup>3</sup> See FTA Circular 4702.1B, Chapter 4, Section 6.



Service Standards

awareness, and approval of the report's findings. Although not a Title VI requirement, RT addresses disproportionate burdens on low-income populations in this process as well.

The provisions of this document pertain to the regular monitoring of RT's service and may also prompt changes in RT's service. However, Title VI and federal Environmental Justice law also require RT to prepare an equity assessment prior to adopting any major changes to service or to the fare structure.<sup>4</sup> This process is discussed in RT's Service and Fare Change Policies document.

#### Minority and Low-Income Definitions

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.<sup>5</sup>

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 2012, poverty guidelines ranged from \$11,170 for a single-person household to \$38,890 for a household of eight. The poverty guideline for a household of four was \$23,050. FTA encourages transit agencies to use a locally-developed threshold for low-income status, provided that the threshold is at least as inclusive as the HHS poverty guidelines. Since survey data does not always include household size or exact household income, RT will, when necessary, define low-income status according to the poverty guideline for a household of four, rounded up to the nearest bracket boundary. For example, if household income is known in \$15,000 increments, RT will consider household income less than \$30,000 to be low-income.<sup>6</sup>

#### Data and Methodology

FTA defines a minority route as a route that has at least one-third of its total revenue mileage in a census block group with a percentage of minority population that exceeds the percentage of minority population in the transit service area. RT uses demographic data from the U.S. Census Bureau's American Community Survey to make this determination, although passenger surveys may be used instead for express buses and other routes where the demographics of the actual ridership may not match the area that is travelled through.

<sup>&</sup>lt;sup>4</sup> See RT's Service and Fare Change Policies.

<sup>&</sup>lt;sup>5</sup> See FTA Circular 4702.1B, Chapter 1, Section 5.

<sup>&</sup>lt;sup>6</sup> See FTA Circular 4702.1B, Chapter 1, Section 5.



FTA recommends a Title VI Service Monitoring analysis be conducted on a sample of routes, which must include minority and non-minority routes. Although no numerical requirement exists, FTA guidance notes that the greater the sample size, the more reliable the results. In accordance with these guidelines, RT will usually include all regular routes in the sample, with the exception of demonstration projects, supplemental routes, contract service, special service, etc.

#### Report Findings

As described above, RT prepares a Title VI Service Monitoring report at least once every three years. The Title VI Service Monitoring compares all fixed-route service to RT's service standards and policies, as set forth in this document, analyzes why any deficiencies exist, and suggests remedies. If any standards are found to be outdated or inappropriate, staff will also include an analysis and recommendations for revision. Staff will present the Service Monitoring report to the RT Board for consideration and approval, at which time the Board may also determine, based upon the report's findings, that a disparate impact on minority populations exists, in which case RT will take corrective action to remedy the disparities to the greatest extent possible.<sup>7</sup>

Since service improvements are not always financially feasible, RT is not required to add service in response to a disparate impact; however, if the RT Board determines that a disparate impact exists, RT will investigate cost-neutral ways to remedy the disparate impact. If such a condition exists, RT will also assure that if major service increases are proposed,<sup>8</sup> that the major service increases will improve overall service levels to minority populations relative to RT's overall ridership. This requirement will remain in effect until the RT Board determines that the disparate impact has been corrected, or until adoption of the next major service change, whichever comes first.

As part of RT's Title VI program, RT will provide FTA with a copy of the Board resolution affirming consideration, awareness, and approval of the Service Monitoring report, as well as a discussion of any disparate impacts and actions taken to remedy the disparities.<sup>9</sup>

Although not a Title VI requirement, RT includes disproportionate burdens on low-income populations in this process as well.

### 3. VEHICLE LOADING STANDARDS

RT collects ridership data on all bus and light rail routes, including the passenger load at the maximum load point of the trip. Vehicle loading standards are set forth below and

<sup>&</sup>lt;sup>7</sup> See FTA Circular 4702.1B, Chapter 4, Section 6.

<sup>&</sup>lt;sup>8</sup> Major service changes are defined in RT's Service and Fare Change Policies, per Title VI requirements.

<sup>&</sup>lt;sup>9</sup> See FTA Circular 4702.1B, Chapter 4, Section 6.



generally range from a load factor of 1.0 to 2.0 based upon the number of seats and interior floor space of the vehicle.<sup>10</sup> Load factors are generally lower for RT's smaller buses as they tend to have narrower aisleways and fewer places to stand.

Vehicle Type	Seated	Standing	Total	Load Factor
40ft Low-Floor Bus	34	26	60	1.8
25ft Cutaway Bus	12	5	17	1.4
27ft Cutaway Bus	16	6	22	1.4
28ft Body-on-Chassis Bus	21	8	29	1.4
32ft Cutaway Bus	30	10	40	1.3
80ft Siemens Light Rail Vehicle	64	64	128	2.0
84ft CAF Light Rail Vehicle	64	64	128	2.0
88.5ft UTDC Light Rail Vehicle	67	67	134	2.0
Other Vehicle Types	Determined as Needed			

# Vehicle Loading Standards

RT considers a route to be overloaded if 25 percent or more of one-way vehicle trips are regularly overloaded. For example, for an hourly route with 32 one-way vehicle trips per day, if 8 or more trips are overloaded, then the route is considered overloaded.

### 4. PRODUCTIVITY / HEADWAY STANDARDS

RT bases bus and light rail headways on both policy and productivity. Due to the importance of light rail in RT's system, bus headways are often based around light rail headways. Headway policies are as follows:

- Light rail runs at 15 or 30 minute headways
- Regular bus routes connecting with light rail usually run at multiples of 15 minute headways to facilitate transferring
- Regular headways should not exceed 60 minutes on any trunk or branch line
- Headways on peak-only routes are based on passenger loads and are adjusted to match school bell times, shift changes, etc., except for light rail feeders, which should be timed around the light rail schedule
- In areas where headways are 30 to 60 minutes, parallel routes should generally be spaced approximately one mile apart and additional resources should be used to improve headways before adding new routes or branches at closer distances

<sup>&</sup>lt;sup>10</sup> The loading factor is the ratio of total passenger capacity to seats.



Headway adjustments are based primarily upon productivity. Bus routes exceeding RT's maximum productivity standards are recommended for service increases while corrective action is recommended for routes that fail to meet RT's minimum productivity standards.

Sorvice Type	Productivity Standards			
Service Type	Mini	mum	Maxi	mum
Regular Weekday Bus Service	20	boardings per hour	40	boardings per hour
Saturday Bus Service	15	boardings per hour	35	boardings per hour
Sunday/Holiday Bus Service	15	boardings per hour	35	boardings per hour
Community Bus Service	15	boardings per hour	30	boardings per hour
Peak-Only Light Rail Feeder	15	boardings per trip	34	boardings per trip
Peak-Only Downtown Express	25	boardings per trip	34	boardings per trip
Supplemental Service	25	boardings per trip	62	max load
Light Rail – Weekdays	85	boardings per train hr	400	max load
Light Rail – Weekends	65	boardings per train hr	400	max load
Contract Service	Varies	cost per passenger	Varies	cost per passenger

# **RT Productivity Standards**

All productivity standards that are stated in terms of boardings per revenue hour can also be stated in terms of an equivalent cost per passenger boarding, which varies from year-to-year according to RT's hourly per-vehicle operating costs. RT evaluates contract service according to the equivalent cost per passenger standards for Community Bus Service, less the operating subsidy.<sup>11</sup>

#### 5. ON-TIME PERFORMANCE STANDARD

On-time performance for RT's bus system is measured at time points. A bus is considered on-time if it leaves its time point between 0 and 5 minutes late. For the last time point on each trip, the arrival time is used instead of the leave time.

RT's target is for the bus system to be 85 percent on-time or better. Individual routes are expected to be within one standard deviation of 85 percent on-time or better. For Title VI purposes, all routes are expected to be within one standard deviation of the actual systemwide average or better. Deviations from this goal are investigated to determine if there is a disparate impact on minority routes. This process is repeated for low-income routes.

<sup>&</sup>lt;sup>11</sup> Service levels for contract service operated by RT are subject to the terms of the service agreement.



On-time performance for RT's light rail system is measured at the starting point of each trip. Trains are considered on-time if they depart 0 to 5 minutes late. RT's target is for the light rail system to be 97 percent on-time or better. Individual light rail routes are also expected to be 97 percent on-time or better. Statistically significant deficiencies are investigated to determine if there is a disparate impact on minority or low-income passengers.

#### 6. SERVICE AREA COVERAGE STANDARD

RT is authorized to serve the area within the Urban Services Boundary (USB) of Sacramento County, as well as portions of Yolo and Placer Counties. Yolo and Placer County, having elected to provide their own transit service, are currently served by locally based transit operators, as are the cities of Folsom, Elk Grove, Galt, and Rancho Murieta within Sacramento County. RT remains the official service provider for the area within Sacramento's USB, less the City of Folsom and the City of Elk Grove.<sup>12</sup>

While RT is the transit agency responsible for service to the aforementioned area, RT only provides service to a subset of this area. The table below specifies standards for actual coverage of RT's service area, at two different walk distances. Three-quarters of a mile is the standard walk distance used by both the Americans with Disabilities Act as well as FTA's National Transit Database to define a transit agency's coverage. For the purposes of estimating likely transit riders, however, FTA suggests that transit agencies assume walk distances of a quarter mile for bus routes and a half mile for light rail stations.

#### **Service Coverage Standards**

Distance	Basic Local Service	High Frequency Service
0.75 miles from bus routes 0.75 miles from rail stations	85% of population	20% of population
0.25 miles from bus routes 0.50 miles from rail stations	50% of population	10% of population

<sup>&</sup>lt;sup>12</sup> The City of Folsom and the City of Elk Grove provide their own local transit service. A small portion of the City of Folsom is still part of RT's service area, specifically, the area within three quarters of a mile of RT's light rail stations. A small portion of the City of Elk Grove is still part of RT's service area as well, specifically, the area within three quarters of a mile of Route 65.



Basic local service refers to regular all-day weekday bus and light rail service on regular headways. It excludes express buses and other peak-only routes. High frequency service is considered to be service with headways of 15 minutes or better.<sup>13</sup>

# 7. VEHICLE ASSIGNMENT POLICY

In order to assure that vehicles are not assigned in a discriminatory fashion, FTA requires transit agencies to have a written policy specifying how vehicles are assigned to routes.

#### Bus Assignment

Prior to each operator signup, a baseline vehicle schedule is prepared for the upcoming signup period. Low-mileage vehicles are usually assigned to higher-mileage routes, so as to equalize mileage on vehicles of the same age. Certain routes may be designated to have buses with special equipment, e.g., branded or wrapped vehicles, signal prioritization equipment, or data terminals that are used for route deviations. Higher-performing vehicle types may, at the discretion of RT's Operations Division management, be assigned to blocks with more schedule adherence problems.<sup>14</sup> On a daily basis, RT's Maintenance Department makes adjustments to the baseline vehicle schedule according to maintenance needs.

For RT's Title VI Service Monitoring report, RT calculates the average vehicle age for each route, and aggregates this data into an average vehicle age for all minority routes, which is compared to that for RT's overall system, to determine if a disparate impact exists.<sup>15</sup>

#### Light Rail Vehicle Assignment

All RT light rail vehicles are air-conditioned, have high floors, have similar seating and standing capacities, and are dispatched from the same yard and maintenance facility. Train consists on the Blue Line and Gold Line can be and often are composed of mixed vehicle types for various reasons, including service and maintenance scheduling, voltage requirements, and performance. The Green Line uses a specially wrapped light rail vehicle.

For RT's Title VI Service Monitoring report, RT estimates the average vehicle age for each route.<sup>16</sup> These findings are presented, along with the percent minority ridership for each route, to determine if a disparate impact exists.

<sup>&</sup>lt;sup>13</sup> See RT's 2009 TransitAction Plan for long-range coverage goals.

<sup>&</sup>lt;sup>14</sup> For example, newer vehicles with better acceleration may be assigned to routes with frequent stops.

<sup>&</sup>lt;sup>15</sup> This figure is weighted by the number of trips operated on each route by each vehicle.

<sup>&</sup>lt;sup>16</sup> This estimate is based on known vehicle assignments from randomly chosen route checks.



# 8. TRANSIT AMENITY DISTRIBUTION POLICY

#### Bus Stops

Locations for advertisement-supported shelters and benches are suggested by RT's contractor. RT also has numerous non-advertisement-supported shelters and benches that are located according to a number of criteria. Once a desired location is decided upon, RT determines if the desired location is feasible. All amenity installations must comply with local building codes, as well as with the Americans with Disabilities Act and Title 24 of the California Construction Code. Shelters also require an electrical connection for lighting. When a desired amenity location is not feasible, RT works with the applicable city or county to make necessary improvements.

Signage at all bus stops includes the route number, days of operation, a stop identification number, and a telephone number for more information. System maps are provided at all bus stop shelters. Route-specific maps and schedules are not normally provided at RT bus stops, although they are available at some bus stops where they were originally installed on a demonstration basis. Trash cans are installed by RT according to perceived need.

New benches and shelters paid for by RT are located according to a number of factors including, but not limited to, the following:

- Average daily boardings at the stop
- Prevalence of disabled passengers
- Presence or absence of amenities in the nearby area (e.g., shelter, trash cans, seating, lighting, etc.)
- Cost for additional curb, gutter, street, or sidewalk improvements
- Financial assistance from local jurisdictions, business improvement districts, etc.
- Minimum ridership of 40 daily boardings for shelters
- Title VI compliance goals

RT maintains a database of all bus stops, including benches and shelters. Using GIS software, RT compares this data to census data on service area demographics. RT's Title VI goal is for the percent of bus stops in minority areas equipped with benches to equal or exceed that for RT's overall service area. If a deficiency is found requiring corrective action, then, where the aforementioned ADA and other siting rules allow, RT will install non-ad-supported benches to correct the deficiency. If ADA or other siting rules prevent RT from adding benches where desired, RT will notify the applicable city or county. This process is repeated for shelters.



#### **Light Rail Stations**

Amenities for light rail stations are distributed according to estimated ridership. Older stations may have been built to more limited standards. Improvements are programmed as part of RT's long-range capital program, as funding permits, to bring them into compliance with the following standards.

a) Shelters: Minimum area of 3 sq. ft. per weekday peak hour passenger in each direction, excluding No shelters provided at mini-high shelters. transit malls. b) Mini-High Shelters: Must cover mini-high platform (used by mobilityimpaired passengers to board trains) if shelters are provided at the main platform. c) Drinking fountains: 1 per platform, except for island stations. An additional drinking fountain may be provided at a bus transfer center (with at least 3 bus stops) where the bus stops are not contiguous with the light rail platforms. Minimum of 12 linear feet (LF) of seating on d) Seating (main platform): each main platform. Additional seating of 0.2 LF per weekday peak hour passenger in each direction. 1 seat or bench at each mini-high platform. e) Seating (mini-high platform): f) Trash receptacles: Based on size of station, number of riders, and observed need. g) Recycling receptacles: Not currently provided. May be added in the same quantities as trash receptacles, once RT begins a recycling program. h) Bicycle racks: 1 rack (5-bike capacity) per station for new stations. Added or removed based on observed demand and use. i) Bicycle lockers: Initially provided based on estimated usage. Lockers may be added or removed later based on demand. Note that RT provides lockers to customers only by rental agreement, so demand is precisely known. i) Information display cases: (For maps, Schedules. and How-To-Ride Guides) 1 four-sided display case per platform direction of travel. Additional two-sided display cases may be provided at each bus transfer center platform (with at least 2 bus stops) where the bus stops are not contiguous with the light rail platforms. Electronic signage may substitute for traditional displays.



<ul><li>k) Dynamic Message Signs:</li><li>I) Fare Vending Machines:</li></ul>	2 per platform at new and existing major stations Goal of 2 per station, except very low ridership stations. Additional FVMs may be provided at platforms with very high ticket purchases (more than 1,000 average daily weekday boardings per platform).
m) Smart Card Addfare Machines: (when implemented)	1 per station at major stations. Additional FVMs may be provided at platforms with very high ticket purchases (more than 1,000 average daily weekday boardings per platform). Smart Card implementation expected to begin in 2013.
n) Smart Card Tap Devices: (when implemented)	Minimum 1 per platform. 2 per platform for most stations and 3 per platform for larger stations with heavy ridership or numerous well-used entrances
o) Elevators:	Provided when vertical distance of travel is greater than 16', unless replaced by a code- compliant ramp
p) Tree shading:	As needed to provide 50% shade coverage of platform and parking lots at maturity (15 years), or as close as possible to that goal while meeting other station design criteria. Removed on a case-by-case basis for safety/security purposes.
q) Artwork:	1 art commission per station, except at sidewalk stations/malls.

For purposes of this policy, a center platform is considered 1 platform whether it serves one or two tracks. RT's Title VI goal is to meet the above-stated goals for seating and shelter. If, during the Service Monitoring process, RT is found deficient in this goal with respect to minority or low-income areas, RT will incorporate Title VI status into its capital development process to correct the deficiency.

### 9. PERFORMANCE MONITORING

RT's 2012 TransitRenewal study recommended the establishment of quantitative productivity standards and a quarterly evaluation process for RT's fixed-route bus system. RT's quarterly ridership report compares each bus route's productivity to RT's productivity standards, set forth in Section 4 of this document. Bus routes that do not meet RT's productivity standards are added to a watch list and corrective action may be recommended by staff, if applicable. New bus routes that do not meet RT's productivity standards are automatically discontinued, according to RT's route sunset process.<sup>17</sup>

<sup>&</sup>lt;sup>17</sup> See RT's Service and Fare Change Policies for more information on RT's route sunset process.



Corrective action for low-productivity routes may include the following:

a) Marketing Campaigns	Example activities include email blasts, press releases, newsletters, notices in vehicles, at major bus stops, and at light rail stations, fliers and handouts, promotional events, etc.
b) Route/Schedule Adjustments	Examples include changes to headways, span of service, alignment, connection timing, and/or route/schedule adjustments to nearby routes to shift riders from one route to another; RT will not, as a practice, operate headways longer than 60 minutes
c) Conversion to Smaller Bus	RT will assess the feasibility and savings from conversion of a full-size bus route to use a smaller bus <sup>18</sup>
d) Cost-Sharing	RT may pursue a cost-sharing agreement with nearby businesses, jurisdictions, or other organizations to reduce the net cost per passenger to a level equivalent to or exceeding RT's minimum productivity standards

#### **Ridership Reporting Program**

Quarterly ridership reports are supplemented on a periodic basis with special in-depth reports. RT's overall ridership reporting program is summarized as follows:

a) Key Performance Report <sup>19</sup>	Mode-level ridership data, including total ridership, boardings per revenue hour, farebox recovery, cost per passenger, on-time performance, complaints, vehicle reliability, fare evasion, etc.; includes comparison to budget goals, and comparison to previous year
b) Quarterly Ridership Report	Route-level ridership data, including average daily ridership, boardings per revenue hour, farebox recovery, cost per passenger, and comparison to previous year; per TransitRenewal guidelines, boardings per revenue hour and cost per passenger are compared against productivity standards (see Section 2 of this report);
c) Year-End Report	Supplement to Quarterly Ridership Report, usually updated after the close of the fiscal year

<sup>&</sup>lt;sup>18</sup> This option may be constrained by RT's collective bargaining agreement with the operators' union.

<sup>&</sup>lt;sup>19</sup> The Key Performance Report is prepared by RT's Finance and Community/Government Affairs Departments and contains Key Performance Indicators (KPIs) for all RT departments. Ridership statistics are the KPI for RT's Planning Department and make up only one part of the overall report.



	examining longer term trends at the system, mode, route, and/or stop/segment level
d) Fare Survey Report	Supplement to Quarterly Ridership Report,
	usually issued after the close of the fiscal year,
	examining ridership by fare category, comparison
a) Title )// Convice Manitoring	of ridership to sales, and historical trends
e) Title VI Service Monitoring	Supplement to Quarterly Ridership Report,
	issued at least once every three years; as
	required by Title VI; evaluates all bus and light
	rail routes against service standards to assure
	that minority and low-income populations are
f) On Deard Current Depart	receiving equitable service levels/quality
f) On-Board Survey Report	Prepared at least once every five years per Title VI requirements: captures detailed
	Title VI requirements; captures detailed information about passengers, including actual
	origins and destinations, trip purpose, ethnicity,
	household income, transferring patterns, and
	other data
g) Route Profiles	Supplement to Quarterly Ridership Report,
g, nodio i romoo	issued at least once every five years, usually
	after a new on-board survey has been completed
	or new census data has been released; provides
	route map, historical narrative, demographics of
	service area and actual passengers, historical
	ridership trends, etc.

Appendix J

**Service Change Policy** 

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#### **RESOLUTION NO. 15-12-**\_\_0137

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

December 14, 2015

### **REPEALING AND RESTATING RESOLUTION NO. 13-08-0125, REPEALING AND RESTATING SACRAMENTO REGIONAL TRANSIT DISTRICT'S SERVICE AND** FARE CHANGE POLICIES, AND ADOPTING A NEW SERVICE CHANGE POLICY

WHEREAS, Resolution No. 13-08-0125 established Service and Fare Change Policies for the Sacramento Regional Transit District; and

WHEREAS, Resolution No. 15-11-0129 established a Fare Change Policy for the Sacramento Regional Transit District, superseding the fare change provisions of Resolution No. 13-08-0125; and

WHEREAS, this resolution has come before the Board as an open session agenda item of a regular meeting properly noticed in accordance with the Ralph M. Brown Act; and

WHEREAS, the Board of Directors of the Sacramento Regional Transit District has taken into consideration public comments on the proposed resolution.

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

THAT, Resolution No. 13-08-0125 is hereby repealed; and

THAT, the Board of Directors of the Sacramento Regional Transit District hereby adopts a new Service Change Policy as set forth in Exhibit A.

SCHENIRER Chair

ATTEST:

MICHAEL R. WILEY, Secretary

Indy Burla Jy Brooks, Assistant Secretary Bv:

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Exhibit A



Service Change Policy

December 14, 2015

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Service Change Policy

# 1. INTRODUCTION

It is the policy of the Sacramento Regional Transit District (RT) to provide quality service to all customers regardless of race, color, national origin, or income. This document establishes RT policy and describes several policies and procedures relating to fixed-route service changes.

This document is intended to satisfy Title VI of the Civil Rights Act of 1964, Executive Order 12898, and related federal civil rights laws, which help ensure that RT's services are provided in a non-discriminatory manner, specifically with regards to minority populations and low-income populations. This document also provides guidelines for meeting the requirements of the California Environmental Quality Act (CEQA) as they relate to service changes.

Title VI requires RT to adopt a numerical standard defining what constitutes a major service change. This definition and policy is discussed in Section 2. RT's 2012 TransitRenewal study also established a sunset clause for new routes which is incorporated in Section 3. Section 4 describes RT's public involvement process for major service changes.

Prior to adopting major service changes, Title VI and federal environmental justice regulations require RT to prepare an equity analysis to determine if the proposed changes are likely to result in adverse and disparate impacts (DI) on minority populations and/or disproportionate burdens (DB) on low-income populations. These definitions and policies are set forth in Section 5. Section 6 discusses their application.

Section 7 discusses RT's requirements under CEQA as they relate to service changes.

### 2. MAJOR SERVICE CHANGE DEFINITION

RT categorizes service changes as either minor or major according to their size and likely impact. Minor service changes can be authorized by RT's General Manager/CEO. Major service changes require a public hearing (discussed in Section 4 of this document), a Title VI equity analysis (discussed in Sections 5 and 6 of this document) and approval by the RT Board.

A major service change is defined as follows:

- Creation of any new bus route exceeding 150 daily revenue miles; or
- Creation of any new light rail route or extension of any existing light rail routes; or
- Any change to an existing bus or light rail route that affects more than 15 percent of daily revenue miles



Any service change that does not meet the criteria for a major service change is considered a minor service change. Additionally, the following exceptional cases are considered minor service changes:

- Automatic elimination of a bus route according to RT's route sunset process set forth in Section 3 of this document (RT will, however, notify riders prior to the effective date)
- RT Board action to temporarily exempt a bus route from RT's route sunset process
- Schedule adjustments (RT will, however, notify riders prior to the effective date)
- Creation, alteration, or elimination of a supplemental route<sup>1</sup>
- Emergency changes made to respond to natural or man-made disasters or to a state of fiscal emergency
- Creation, alteration, or elimination of temporary or demonstration service lasting one year or less
- Creation, alteration, or elimination of special event service (RT Board approval may be necessary for certain aspects of the service, e.g., acceptance of event tickets as fare media)
- Adjustments made to major service changes after Board approval but prior to the effective date that would otherwise be considered minor changes

If an Environmental Impact Report (EIR) or an Environmental Impact Statement (EIS) has been prepared for a project, the EIR/EIS review and approval process is considered to satisfy all review and approval requirements for a major service change, with the exception of the Title VI equity analysis, which is still required if the project meets the definition of a major service change. FTA explicitly requires a Title VI equity analysis be approved by the RT Board prior to the beginning of revenue service for any project funded by the FTA's New Starts program.

Contract service operated by RT and included in vehicle hour and mile reporting to FTA's National Transit Database is considered RT service for purposes of this policy. Any changes to such service that meet RT's major service change definition are subject to RT's Title VI requirements, public hearing requirements, and approval requirements.

All revenue mile calculations made for the purpose of classifying the service change must include the cumulative impact from service changes implemented in the twelve months preceding the effective date of the proposed new changes. Light rail revenue miles are counted at the level of entire trains rather than individual light rail vehicles.

<sup>&</sup>lt;sup>1</sup> Supplemental routes are peak-only routes that are designed to accommodate heavy passenger volumes that would otherwise overload RT's regular routes. Supplemental routes usually operate only seasonally and often must be adjusted on short notice to respond to changing demand conditions.



Service Change Policy

#### 3. ROUTE SUNSET PROCESS

RT's TransitRenewal study set forth a "sunset clause" whereby newly-created fixedroute bus routes must meet RT's productivity standards within two years of implementation.<sup>2</sup> This sunset clause, as an element of TransitRenewal, was accepted by the RT Board as a guideline for future service development, and has been incorporated here as RT policy. Pursuant to this policy, RT reviews route productivity on a quarterly basis, maintains a "watch list" of deficient bus routes, and makes annual recommendations to improve productivity.

If a new bus route fails to meet RT's productivity standards within two years of operation, RT will initiate an automatic elimination process (sunset elimination) that consists of the following steps:

- Staff advises the RT Board of the pending route elimination during a meeting of the Board of Directors.<sup>3</sup>
- Through a motion or a resolution, the RT Board may temporarily exempt the route in question from RT's route sunset process. See Appendix A for an example.
- Absent any Board action, staff will (1) determine an appropriate date for elimination,<sup>4</sup> (2) notify riders of the route's pending elimination and alternative routes, if applicable, and (3) identify areas where resources could be redeployed.

Although a route elimination would ordinarily be considered a major service change, since new routes are implemented with an understanding of RT's sunset clause, elimination of a route through RT's route sunset process is considered a minor service change. It will therefore be exempt from RT's public hearing and equity analysis requirements, and all other requirements that apply only to major service changes. As noted above, RT will notify riders prior to the route's actual elimination.

### 4. PUBLIC INVOLVEMENT

To assure meaningful public involvement, especially from minority and low-income populations, Title VI requires RT to develop a Public Participation Plan. The provisions of this section are intended to summarize RT's public involvement program as it relates to service changes.<sup>5</sup>

<sup>&</sup>lt;sup>2</sup> RT's productivity standards are set forth in RT's Service Standards document.

<sup>&</sup>lt;sup>3</sup> Previous productivity reports and watch list reports may be referenced or provided to document the failure of the route to meet RT's productivity standards.

<sup>&</sup>lt;sup>4</sup> As an example, RT may want to eliminate the route when other major changes are being made, so that outreach efforts can be consolidated, printed materials will be up-to-date, etc.

<sup>&</sup>lt;sup>5</sup> The Public Participation Plan will be adopted separately. This section is intended to be only a summary.



#### Public Review

A public hearing and a 30-day public review period are required prior to the adoption of major service changes. Staff will make a plan of the proposed changes as well as a draft Title VI service change equity analysis publicly available. Prior to adoption of any proposed changes, staff will consider and summarize all comments and make any necessary revisions to the service change proposal and Title VI service change equity analysis. The Board will consider the public comments prior to adoption of the changes and the final equity analysis.

#### Public Notice

On or before the beginning of the comment period, RT will distribute a notice to riders and members of the public on the materials available for review, including:

- A title, a one or two sentence description of the proposed changes, and a statement that RT is seeking public comments
- Notice of documents available for review (e.g., draft service plan, Title VI equity analysis, and/or CEQA documents)
- All routes that may be changed, listed by number, or, in the case of light rail lines, by name (e.g., Blue Line)
- The final date and time to submit comments
- The date, time, and location of the hearing and transit routes serving the location
- Contact information and where to find additional information

RT will post the notice on RT's web site in English as well as any non-English languages determined by RT policy on language assistance.<sup>6</sup> RT will also display the notice in RT vehicles, at major stops and stations, to applicable mailing list subscribers, and in RT's monthly newsletter, if time permits. RT may notify riders through press releases or through social media. At least one presentation will typically be made to RT's Mobility Advisory Council. RT staff may also make presentations at the meetings of other interested organizations and groups.

#### Language Assistance

If requested, and given sufficiently advance notice (usually 3 business days or more), RT will provide an interpreter (including sign language) at the public hearing. RT's Language Line service also provides interpretation services over the phone for patrons calling for additional information, to make comments, or to arrange interpretation services at the public hearing.

<sup>&</sup>lt;sup>6</sup> In addition to a Public Participation Plan, Title VI requires RT to develop a Language Assistance Plan (LAP), which will be adopted separately. The provisions of this section are intended to be only a summary of RT language assistance policy specifically related to service changes.



5. EQUITY ANALYSIS – GENERAL

#### Requirements

Prior to adopting major service changes, Title VI and federal environmental justice regulations require RT to prepare an equity analysis to determine if the proposed changes are likely to result in disparate impacts (DI) on minority populations or disproportionate burdens (DB) on low-income populations.<sup>7</sup> RT's DI and DB definitions must measure adverse effects on passengers and must be developed with public engagement.

#### **Disparate Impacts**

Title VI requires RT to analyze proposed major service changes to identify any possible DI on minority populations.<sup>8</sup> If a statistically significant adverse effect on minority populations is found to be likely, Title VI requires RT to provide a substantial legitimate justification, including a finding that there are no alternatives that would have a less disparate impact on minority riders but would still accomplish RT's legitimate program goals, before adopting the changes.<sup>9</sup>

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

#### Disproportionate Burdens

Executive Order 12898 on Environmental Justice requires RT to analyze major proposed service changes to determine if they are likely to result in a disproportionate burden on low-income populations.<sup>10</sup> A finding of disproportionate burden requires RT to take steps to avoid, minimize, or mitigate impacts where practicable<sup>11</sup> and to describe alternatives available to low-income passengers affected by the changes.<sup>12</sup>

<sup>&</sup>lt;sup>7</sup> Due to the similarity of the DI and DB processes and definitions, both requirements are usually satisfied with a single equity analysis that addresses both requirements.

<sup>&</sup>lt;sup>8</sup> A disparate impact is defined as a facially neutral policy or practice that disproportionately affects minority populations where the policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect. (See FTA Circular 4702.1B, Chapter 1, Section 5.)

<sup>&</sup>lt;sup>9</sup> See FTA Circular 4702.1B, Chapter 4, Section 7.

<sup>&</sup>lt;sup>10</sup> A disproportionate burden is defined as a neutral policy or practice that disproportionately affects lowincome populations more than non-low-income populations. (See FTA Circular 4702.1B, Chapter 1, Section 5.)

<sup>&</sup>lt;sup>11</sup> See FTA Ćircular 4702.1B, Chapter 1, Section 5.

<sup>&</sup>lt;sup>12</sup> See FTA Circular 4702.1B, Chapter 4, Section 7g.



#### Service Change Policy

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 (DHHS) poverty guidelines.<sup>13</sup> The DHHS definition varies by year and household size. For 2015, DHHS poverty guidelines ranged from \$11,770 for a single-person household to \$40,890 for a household of eight. The poverty guidelines for a household of four were \$24,250.

FTA encourages transit agencies to use a locally-developed threshold for low-income status, provided that the threshold is at least as inclusive as the DHHS poverty guidelines. Since survey data often excludes household size and rarely includes exact household income, RT will, when necessary, define low-income status according to the poverty guideline for a household of four, rounded up to the nearest bracket boundary. For example, if household income data was available in \$15,000 brackets, and the DHHS poverty guideline for a household of four persons was \$24,250, then RT would round up the poverty guideline to \$30,000, so that any person reporting household income less than \$30,000 would be considered low-income.

#### Data Sources

In accordance with FTA guidance, when feasible, RT will use data from on-board passenger surveys for Title VI equity analyses. For service changes, if sufficient on-board survey data is not available or deemed unreliable, RT may substitute demographic data on the service area of the affected routes.

When using service area data, RT uses data from the U.S. Census Bureau's most recent five-year American Community Survey aggregated at the level of census tracts. Using Geographic Information Systems (GIS) software, RT computes a population estimate (broken down by minority and low-income status) for each affected route and for the overall RT system. As recommended by FTA, RT will usually assume a walk distance of a quarter mile from bus routes and a half mile from light rail stations.

For major proposed service changes, in addition to the above calculations, RT will prepare maps showing the potentially affected routes overlaid on a demographic map of the service area.

<sup>&</sup>lt;sup>13</sup> See FTA Circular 4702.1B, Chapter 1, Section 5.



6. SERVICE CHANGE EQUITY ANALYSIS

#### Requirements

As discussed in Section 5 of this document, RT is required to conduct an equity analysis prior to adopting major service changes. Title VI requires RT to establish a locally-developed definition for determining DI/DB on minority/low-income populations, including thresholds for statistical significance.

#### **Definitions and Methodology**

RT uses revenue miles to objectively quantify the effects of service changes. When major service changes are proposed, RT computes the change in revenue miles for minority populations at the route level and in aggregate. This is compared to the minority percentage of RT's overall ridership.

RT's Title VI goal is for minority populations to receive at least their share of the benefits in the case of a net service increase, and no more than their share of the adverse effects, in the case of net service reductions. A potential DI may exist if there is a statistically significant deficiency from this goal. RT defines a deficiency as statistically significant if it exceeds 15 percentage points.

*Example:* Assume that RT's overall ridership is 55 percent minority and that RT proposed a major service increase. Minority populations would be expected to consume 55 percent of the new service, measured in revenue miles. Deviations from this goal exceeding 15 percentage points would be considered statistically significant. Therefore, if minority populations received *less than* 40 percent of the benefits, this would constitute a potential DI.

If a potential DI on minority populations exists, then the service 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 DI on minority riders but would still accomplish RT's legitimate program goals.<sup>14</sup>

DBs on low-income populations are determined in like fashion, with the threshold of statistical significance also being 15 percentage points. If a potential DB on low-income populations exists, then RT must take steps to avoid, minimize, or mitigate impacts where practicable.<sup>15</sup>

A sample cover sheet summarizing all key findings for a service change equity analysis has been provided as Appendix B.

<sup>&</sup>lt;sup>14</sup> FTA Circular 4702.1B, Chapter 4, Section 7a1f.

<sup>&</sup>lt;sup>15</sup> FTA Circular 4702.1B, Chapter 4, Section 7a2g.



Service Change Policy

### 7. ENVIRONMENTAL REQUIREMENTS

California law statutorily exempts the restoration, increasing, or inception of transit service on any rail, street, or highway rights-of-way that are already in use for vehicular travel from requirements under the California Environmental Quality Act (CEQA).<sup>16</sup> If RT declares a state of fiscal emergency, then transit service reductions are also statutorily exempt.<sup>17</sup> These exemptions do not extinguish any requirements for Federal project (e.g., New Starts rail expansions) under the National Environmental Policy Act (NEPA).

For any major service changes that RT determines are non-exempt, RT will prepare an Initial Study according to state CEQA guidelines to determine if the changes are likely to have significant effects on the environment.

If the Initial Study finds that there would be no significant effects, the RT Board may adopt a Negative Declaration (ND) affirming this finding. If the Initial Study finds that there would be potentially significant effects but that they can be avoided or mitigated, a Mitigated Negative Declaration (MND) may be adopted. If the Initial Study finds that there would be one or more significant effects which cannot be avoided or mitigated, an Environmental Impact Report (EIR) is required.<sup>18</sup>

A ND/MND consists of a one-page project summary and declaration that is attached to the front of the Initial Study, both of which must be approved by the RT Board prior to adoption of the major service changes.<sup>19</sup>

#### **Public Review**

CEQA requires a public review and comment period of at least 20 calendar days for an Initial Study prior to adoption of a ND/MND. RT accepts comments by phone, mail, email, or testimony before the RT Board.

CEQA also requires RT to file a Notice of Intent with Sacramento County at least 20 calendar days prior to adoption of a ND/MND. If the Initial Study finds that there are no effects on biological resources, then a No Effect Determination waiver must also be requested from the California Department of Fish and Wildlife (DFW).<sup>20</sup>

Upon adoption of a ND, MND, or EIR, RT files a Notice of Determination with Sacramento County within five business days.

<sup>&</sup>lt;sup>16</sup> See California Public Resources Code, Section 21080(b)(10).

<sup>&</sup>lt;sup>17</sup> See California Public Resources Code, Section 21080.32.

<sup>&</sup>lt;sup>18</sup> Most transit service changes that are not statutorily exempt will require only a ND or MND. It would be unusual to find an EIR necessary for transit service changes.

<sup>&</sup>lt;sup>19</sup> The ND/MND will customarily be part of the same agenda item as the service changes.

<sup>&</sup>lt;sup>20</sup> DFW charges a higher administrative fee for a No Effect Determination waiver if it is not requested prior to the filling of the Notice of Intent with Sacramento County.



Service Change Policy

If a service change, major or minor, is determined by the RT General Manger/CEO, or his/her designee, to be exempt from CEQA, a Notice of Exemption may be filed with Sacramento County.



Service Change Policy Appendix A - Example Route Sunset Exemption

### RESOLUTION NO. YY-MM-\_\_\_\_

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

Month DD, YYYY

### TEMPORARILY EXEMPTING ROUTE X FROM SACRAMENTO REGIONAL TRANSIT DISTRICT'S SUNSET CLAUSE

WHEREAS, Route X is designated to be eliminated, pursuant to Section 3 of Regional Transit's Service Change Policy; and

WHEREAS, the Board of Directors finds that special circumstances justify that Route X be temporarily exempted from this policy.

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

THAT, Route X shall be exempt from the sunset clause provisions of Section 3 of Regional Transit's Service Change Policy for a period of \_\_\_\_\_\_.

[CHAIR'S NAME], Chair

ATTEST:

[GENERAL MANAGER], Secretary

By:

[BOARD CLERK], Assistant Secretary



Service Change Policy Appendix B – Service Change Equity Analysis Template

Project Title/Description				
			CURRENT SYSTEM STATISTICS	
RT Average Weekday Ridership: Bus and Light Rail				
Minority Ridership:				% (A1)
Low-Income Ridership: Household income less than \$30,000				% (B1)
Data Source for Demographics: Ex: 2010 On-Board Survey				
			SERVICE CHANGE IMPACTS	
Data Source for Demographics: Ex: 2010 On-Board Survey (should match above)				
Net Revenue Miles: Annualized	All Riders:			
	Minority:			% (A2)
Low-Income:		icome:		% (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:  Ves 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	Date
			Reviewed by	Date

Appendix K

**Fare Change Policy** 

RESOLUTION NO. 15-11- 0129

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

### November 9, 2015

# APPROVING FARE CHANGE POLICY

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

THAT, the Fare Change Policy set forth in Exhibit D is hereby adopted.

CHENIRER, Chair JAYIS

ATTEST:

MICHAEL R. WILEY, Secretary

Cindy Brooks, Assistant Secretary By:

Exhibit D

# FARE CHANGE POLICY

Sacramento Regional Transit District

Policy Date: 11/09/15

# Sacramento Regional Transit District Fare Change Policy

### I. Introduction

The purpose of the Fare Change Policy (Policy) of the Sacramento Regional Transit District (RT) is to establish guidelines for planning and implementing fare changes. This Fare Change Policy confirms the commitment of the RT Board of Directors (Board) to adhere to sound financial management practices, including prudent planning and management of fares and associated revenues, financial capacity and customer interests. RT's fare policies and procedures are subject to and limited by the applicable provisions of State and Federal law, and funding regulations.

This Fare Change Policy is intended to work in concert with other RT fiscal responsibility policies, including farebox recovery, comprehensive reserves, and fiscal sustainability.

### II. Fare Change Policy Objectives

The primary objectives of RT's fare change activities are to:

- Support long term financial planning, by providing a predictable and consistent fare change practice, resulting in sustainable transit services to the public.
- Provide sufficient fare revenues to meet, in conjunction with other available operating and capital funds: customer service needs; local match for capital; fiscal obligations (including debt); and grant requirements each and every year.
- Consider changes in customer income and ability to pay, approximating general pay and benefit increases, providing customers greater predictability of modest fare changes to ease personal budgeting.
- Consider the costs of competing modes of transportation (e.g., mileage and parking costs of automobiles), and other factors valued by potential customers of transit.
- Maximize ridership while meeting financial requirements and other RT goals.
- Support attainment of farebox recovery targets in a consistent and predictable manner; while providing transit services below cost to the public.
- Consider equity and affordability for disadvantaged populations, discounting strategy for target populations and the ability to attract new riders.
- Comply with applicable laws and funding regulations, including Federal Title VI and California funding regulations which set minimum farebox recovery standards.

### III. Scope and Authority

This Policy governs the planning, adoption and execution of all fare changes. The Board retains control over all final fare change decisions. Staff will consistently plan for fare changes, analyze fare change options that meet revenue needs and other goals, gain public input, make recommendations to the Board, and implement the decisions of the Board. Staff will also include planned changes to the average fare in the long-term financial plan supported by RT's Financial Forecasting Model every other year.

### IV. Context for the Fare Change Policy

Generally speaking, RT's costs increase as a result of inflationary pressures each year. RT will continue to practice sound fiscal stewardship and pursue cost savings initiatives to slow the rate of cost growth, as indicated in the fiscal sustainability policy. Most of RT's revenues do not increase automatically with inflation, and require adjustment to maintain purchasing power and support RT's operations.

Transit rider income also tends to grow over time through wage and salary growth, as well as through indexed government benefit levels (e.g., social security, welfare, unemployment, disability). The Average Wage Index (AWI) tracks wage and salary growth and the consumer price index for wage earners (CPI-W) drive government benefit levels. The two numbers are generally quite close, each ranging between -1 percent and 4.5 percent annually over the prior decade.

The overall intent of this policy is to plan for a series of routine, modest fare increases every other year. Small, regular fare increases offer many benefits. Riders will become aware that transit prices, like other costs, increase routinely and they can plan for those changes. The smaller increases made possible by more frequent fare changes are easier to absorb in consumer budgets, whose income also generally increases modestly. Lending institutions and credit rating agencies base RT's credit risk in part on fare revenue trends, and executing a policy of routine, modest increases provides the steady, predictable revenue stream that financial analysts' value. Grant making organizations require local match and sometimes local reserves, and farebox revenues are a significant revenue source for such purposes. A series of modest, predictable fare increases provides the opportunity to fund local match to maximize grant revenue. RT needs a steady, predictable income stream to plan, provide, and sustain quality services; fares represent RT's largest source of controllable income.

### V. Approach to Fare Change Planning

Staff will plan a fare change every two years, based on the criteria set out below, and will include this intent in the long-term financial plan, budget documents, grant applications (as appropriate), short-range service plans, and public communications and marketing materials.

Determining whether and by how much to increase the average fare every two years will have three components. First, the average fare will be adjusted for inflation, considering federal indices like CPI-W for urban areas and AWI, as well as changes to RT's cost per passenger boarding, over the two-year period between fare changes.

Second, RT will make appropriate adjustments to the average fare to at least meet legal and regulatory requirements for farebox recovery. Third, if RT's Board has adopted a goal to change the farebox recovery ratio within an associated timeframe (as specified in the Farebox Recovery Policy), RT will make additional adjustments to the average fare to achieve that goal. Note that if no average fare increase is needed to meet all three components, RT's Board may decide to forgo a fare change during that period, or change the structure while holding the average fare constant.

Long-term financial planning uses a percentage change to the average fare and system-wide average elasticity to estimate ridership and revenue. Planning and implementing a fare change requires looking at the fare structure and how individual fare elements might or might not change to achieve the new average fare. Fare elasticity (which measures how different rider groups expand and contract as a result of fare changes) varies by rider group and fare payment method used. For example, longer trips are less elastic than shorter trips, peak period trips are less elastic than off-peak trips, and work trips are less elastic than non-work trips. Staff will use changes to the fare structure to maximize ridership while meeting the fare revenue goal. Staff will seek to develop a mix of fare structure adjustments based on, but not limited to, the following considerations:

- Price of transit services relative to other modes
- Differential pricing (e.g., distance based, type of service, zone, time based)
- Discount strategy (e.g., how many and how deep discounts should be by market sector; compliance with federal regulations; potential discount support from other agencies, civic organizations and foundations)
- Ratio of the average fare per passenger to the nominal base fare (as an indication of the overall level of discounting, including fare evasion)
- Bulk/loyalty pricing (e.g., monthly, weekly, daily passes; high cash loads on the Connect Card<sup>®</sup> or other reloadable payment device)
- Convenience pricing (e.g., round-trip and one-way fares; transfers; day passes)
- Transfer and joint fare agreements with other operators
- Partner support (e.g., employee transit benefits, embedded fares in venue tickets, social service ticket subsidies)
- Ease of understanding (e.g., passenger comprehension of fare options and privileges)
- Ease of payment (e.g., coinage multiples, credit/debit, currency and coins)
- Ease of enforcement (e.g., ability to determine and enforce appropriate fare payment, and minimize fraud and theft of service)
- Administrative and implementation considerations (e.g., media stock and delivery costs and lead times, ticket expiration dates, machine reprogramming costs and constraints, costs for printing and signage, cash handling and credit card processing fees)
- Equity among demographic groups (e.g., determination based on review relative to Title VI of the Civil Rights Act of 1964).

### VI. Public Involvement

Prior to request for Board adoption, staff will schedule, conduct outreach, and solicit public input in accordance with RT's Public Participation Plan. RT's outreach effort will include a 30-day comment period on the proposed changes and the accompanying federally required Title VI fare equity analysis. Prior to holding the public meetings, RT will prepare and distribute a notice to riders and members of the public.

The public notice must include:

- A title and brief description of the proposed changes and a statement that RT is seeking public comments.
- Notice of documents available for review (e.g., draft fare structure proposal(s), Title VI equity analysis, and/or environmental documents).
- The date, time, and location of the public meeting(s) and transit routes serving the location.
- Contact information and where to find additional information.
- The final date and time to submit comments.

RT will post the notice on RT's web site and will accept comments on the proposed fare changes for at least 30 calendar days. The notice will be posted in English as well as any non-English languages determined by RT policy on language assistance. RT will also provide information on the hearing in RT vehicles, at major stops and stations, to applicable mailing list subscribers, and in RT's monthly newsletter, Next Stop News, if time permits. RT may also notify riders through press releases or through social media.

Upon request, and given advanced notice of at least 3 business days, RT will provide an interpreter (including sign language) at the public meeting. RT's Language Line service also provides interpretation services over the phone for patrons calling for additional information, to make comments, or to arrange interpretation services at the public hearing.

Comments received through the public meeting(s) and comment period will be analyzed, evaluated, and reported to the Board. Changes may be made to the recommended fare structure and pricing, and/or additional options considered as a result of public input.

### VII. Compliance with Regulations

In adopting fare changes, RT will comply with all relevant laws and regulations governing fares, discounts, and farebox recovery. Among these are:

- Federal Title VI of the Civil Rights Act of 1964 and Executive Order 12898, addressing equity
- The California Transportation Development Act, as amended (primarily those provisions addressing farebox recovery)

- Federal funding guidelines addressing fare discounts
- Sacramento Area Council of Governments (SACOG) funding requirements addressing fare discounts.

RT's process for conducting a fare equity analysis to comply with Title VI and Executive Order 12898 with respect to fare changes is set out in Appendix A, Fare Equity Analysis.

#### VIII. Implementation of Fare Changes

Given the intended frequency of fare changes, staff must examine how and where fare levels are posted and communicated. The intent is to clearly convey current fare levels and plans for routine, modest changes, efficiently. In addition to posting fares on ticket vending machines, staff will post current fares on-line and guide customers to that site in marketing and communications materials. Staff will likewise strive to minimize the administrative burden and cost of changing fare media, by leveraging technology solutions like mobile phone and smart card payment mechanisms.

### IX. Outcome Reporting

Actual revenue results sometimes vary from plans and projections, and staff will routinely report fare revenue results versus the plan to the Board of Directors. At minimum, such performance results will include average fare per passenger, farebox recovery, total ridership, and total fare revenue, all versus the long-term financial plan (shows compounding impact of differences between planned and actual fare revenues) and the current year budget. When appropriate, staff will recommend changes for Board consideration at mid-year and annual budget reviews.

### APPENDIX A

### FARE EQUITY ANALYSIS

#### Requirements

Under Title VI and Executive Order 12898 RT is required to conduct an equity analysis prior to the adoption of fare changes (including fare reductions), with the exception of Spare the Air days, temporary fare reductions that are mitigating measures for other actions, and promotional fare reductions lasting no more than six months. Paratransit and dial-a-ride fares are also outside the scope of FTA's Title VI fare equity analysis program. Title VI and the Executive Order require RT to establish a locally-developed definition for determining disparate impacts/disproportionate burdens (DI/DB) on minority/low-income populations, including a threshold for statistical significance.

#### **Disparate Impacts**

If a statistically significant adverse effect on minority populations is found to be likely, under Title VI RT must provide a substantial legitimate justification, including a finding that there are no alternatives that would have a less disparate impact on minority riders but would still accomplish RT's legitimate program goals, before adopting the changes.

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

#### Disproportionate Burdens

Executive Order 12898 on Environmental Justice requires RT to analyze proposed changes to the fare structure to determine if they are likely to result in a disproportionate burden on low-income populations. A finding of disproportionate burden requires RT to take steps to avoid, minimize, or mitigate impacts where practicable and to describe alternatives available to low-income passengers affected by the changes.

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 2012, poverty guidelines ranged from \$11,170 for a single-person household to \$38,890 for a household of eight. The poverty guidelines for a household of four were \$23,050.

FTA encourages transit agencies to use a locally-developed threshold for low-income status, provided that the threshold is at least as inclusive as the HHS poverty guidelines. Since survey data does not always include household size or exact household income, RT shall, when necessary, define low-income status according to the poverty guideline for a household of four, rounded up to the nearest bracket

boundary. For example, if household income data is available in \$15,000 brackets, RT will consider household income less than \$30,000 to be low-income.

### **Definitions and Methodology**

RT uses two different surveys to capture information on fare payment. First, an annual fare survey provides an estimate of ridership by mode and fare type, both in absolute and percent terms. Second, at least once every five years, RT conducts an on-board passenger survey that includes fare type, ethnicity, and household income.

When a fare change is proposed, RT uses data from the annual fare survey to determine ridership by fare type, media type, and mode (bus or light rail). Using data from the on-board survey, this data is further split into subsets for minority and low-income riders. RT then prepares a table comparing all fare categories to one another, including percent use by minority and low-income populations, and the proposed percent increase in fare.

Disparate impacts from fare changes are determined by comparing the average fare for all minority riders (aggregated over all fare types) 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. In the case of a net fare decrease, the goal is for the percentage decrease in average fare for minority populations to be equal to or greater than that for non-minority populations. 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.

As an example, assume an increase is proposed to RT's single, daily, and monthly fares. RT's analysis finds that the rate of increase to the overall average fare for nonminority populations is likely to be 10 percent. Differences exceeding 2 percent (20 percent of 10 percent) are considered statistically significant. Therefore, if the rate of increase in overall average fare for minority populations exceeds 12 percent, there may be a potential disparate impact.

If a potential disparate impact on minority populations exists, then the fare change may be implemented only if (1) a 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 burdens on low-income populations are determined in like fashion. If a potential disproportionate burden on low-income riders exists then RT must take steps to avoid, minimize, or mitigate impacts where practicable and must also describe alternatives to low-income passengers affected by the fare change.

### **Review and Approval**

The Title VI fare equity analysis must be approved by the RT Board prior to adoption of any fare change, except as exempted above. Upon adoption of the equity analysis and the fare change, RT will retain records documenting the RT Board's consideration, awareness, and approval of the Title VI equity analysis.