



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

DRAFT

October 14, 2019

(this page intentionally left blank)

CONTENTS

1. Purpose of Analysis.....	1
2. Project Description	1
3. Title VI Requirements.....	3
4. Existing Conditions.....	4
5. Impacts of New Service.....	7
6. Impacts of Fare Change	10

FIGURES

1. Example 40-Foot Proterra Catalyst E2.....	2
2. Existing SacRT Demographics.....	4
3. Minority Population Density	5
4. Low-Income Population Density	6
5. Demographic Comparison for Service Change	7
6. Catchment Area of New Service	9
7. Demographic Comparison for Fare Change.....	10

(this page intentionally left blank)

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.¹

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.

Operating Cost – 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.

¹ 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.

Figure 1
Example 40-Foot Proterra Catalyst E2



Service Description – 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.

Fare Structure – 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.

Marketing and Customer Information – 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.

Approval Authority - 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 minority² and 20.1 percent low-income.³ 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.⁴ 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.

Figure 2
Existing SacRT Demographics

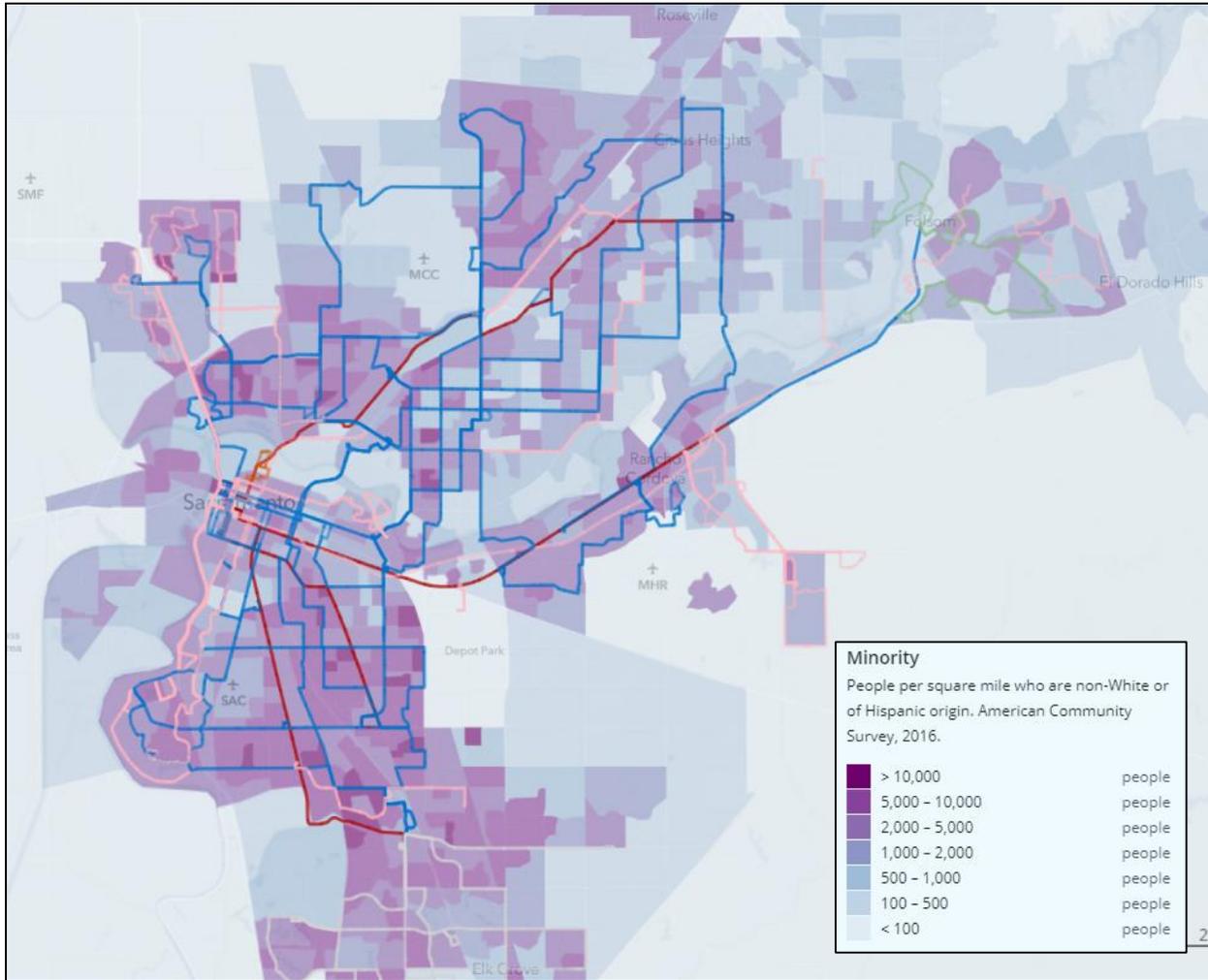
	Service Area	Actual Customers (Post SacRT Forward)
Minority	53.2%	72.3%
Low-Income	20.1%	55.8%

² 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.

³ 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. 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.

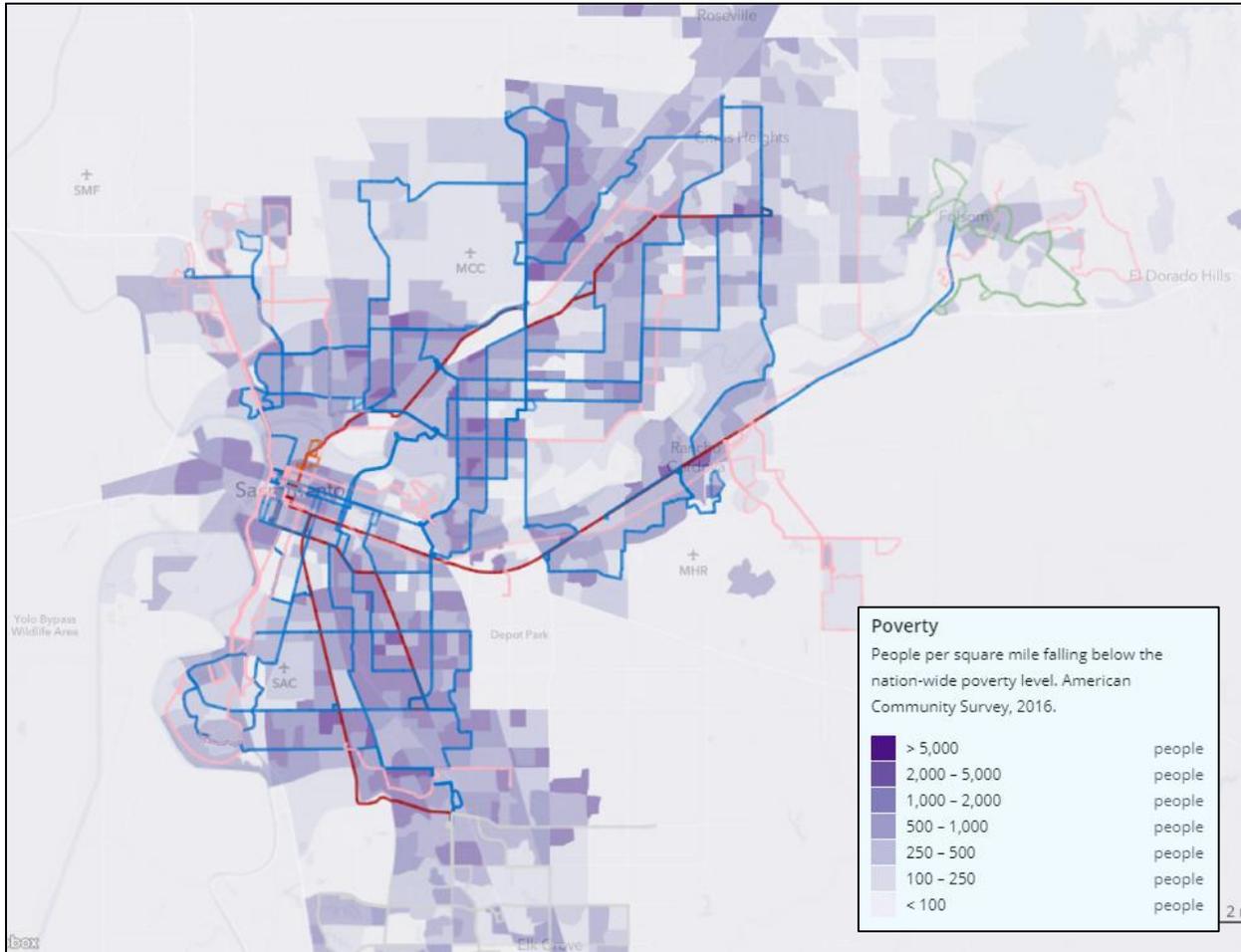
⁴ In April 2013, an on-board passenger survey was conducted aboard SacRT buses and light rail trains. Passengers on randomly selected trips on all SacRT routes completed a self-administered questionnaire on various rider characteristics, including minority and low-income status. An updated survey is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

Figure 3
Minority Population Density



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

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.*

**Figure 5
 Demographic Comparison for Service Change**

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

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.

Justification - 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

Alternatives - 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, and because of the specific restrictions on the various funding sources, 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.

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.⁶

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.*

Figure 7
Demographic Comparison for Fare Change

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

Sources:
UC Davis Common Data Set 2018-2019

⁶ 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>.