Appendix H: Equity Analyses

- 1. Title VI Fare Equity Analysis: Causeway Connection Free Ride Program (October 2020)
- 2. On-Board Single Ride Fare, On-Board Discount Single Ride Fare, and Elk Grove only fares (December 2021)
- 3. September 2022 Service Changes (May 2022)
- 4. April 2023 Service Changes (January 2023)



STAFF REPORT

Agenda Item 2.11

DATE: October 26, 2020

TO: Sacramento Regional Transit Board of Directors

FROM: Laura Ham, VP, Planning and Engineering

SUBJ: APPROVING A TITLE VI FARE EQUITY ANALYSIS FOR THE

UNIVERSITY OF CALIFORNIA, DAVIS IDENTIFICATION CARD FOR

THE CAUSEWAY CONNECTION

RECOMMENDATION

Adopt the Attached Resolution.

RESULT OF RECOMMENDED ACTION

The attached Resolution would approve a Title VI fare equity analysis for the University of California, Davis (UC Davis) Graduate Student and Employee Identification Cards (ID) as valid fare on Route 138, the Causeway Connection intercity express bus service between UC Davis campuses in Davis and Sacramento. The UC Davis Graduate Student and Employee IDs are already being used in this manner on a temporary basis. The attached Resolution is required to continue this program beyond a six-month promotional period.

FISCAL IMPACT

There would be no fiscal impact from adopting the Title VI Fare Equity Analysis proposed in the Resolution.

DISCUSSION

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.

Prior to any fare changes being approved permanently, the Board of Directors must approve the findings of a Title VI fare equity analysis. Prior to approving a 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; members of the public be invited to comment; and Staff and the Board of Directors take public comments into consideration. In accordance with these requirements, SacRT published a draft analysis on September 18, 2020 and notified the public of the opportunity to provide public comments. See Attachment 1 for copies of the public notice and public comment.

Background

On May 4, 2020, SacRT launched the new Causeway Connection Route 138, an intercity express bus between Sacramento and Davis. The Causeway Connection is operated jointly with the Yolo County Transportation District (YCTD). Approximately half of operating costs are covered by UC Davis. The remaining operating costs are primarily covered by a Congestion Mitigation and Air Quality (CMAQ) grant awarded for the multi-agency project. Funding for new electric buses was provided to SacRT and YCTD by Electrify America (EA) as part of the project.

Original Plan - The new Causeway Connection service itself, including a Title VI service equity analysis, was approved by the SacRT Board of Directors on December 9, 2019, following a 30-day public review. At that time, a Title VI fare equity analysis was also approved for a fare change to allow the UC Davis undergraduate ID to be recognized as valid fare media on the Causeway Connection service, subject to execution of an operating subsidy agreement. At that time, it was anticipated that UC Davis employees and graduate students would purchase SacRT fare media through normal channels, with a subsidy provided by UC Davis, and that UC Davis would receive a credit for a portion of the fare revenues received by SacRT and YCTD from such purchases.

Revised Plan - On March 23, 2020, the SacRT Board approved the addition of the UC Davis graduate and employee ID as valid fare media on the Causeway Connection service, subject to the same condition of execution of the operating subsidy MOU. This fare change took effect on May 4, 2020, with the beginning of the Causeway Connection service and has been treated as a six-month demonstration project. The project partners desire to continue the UC Davis ID fare program beyond the six-month demonstration period. To do so requires approval of a Title VI fare change analysis, which is the effect of the attached resolution.

Summary of Analysis

As discussed in the full analysis (Exhibit A) recognizing the UC Davis ID as fare media provides a significant discount to the rider (i.e., allowing the holder to ride without payment) to a group of riders that has limited minority and low-income representation. Although this population is a small fraction of overall SacRT ridership, the analysis finds that recognizing the UC Davis ID as fare media for employees and graduate students results in a potential disparate impact to minority populations and a potential disproportionate burden to low-income populations.

This finding does 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>Alternatives</u> – When the Causeway Connection service was being planned, the partners agreed that UC Davis would pay approximately half the operating cost of the service, net of fare revenue. The partners intended to allow only the undergraduate student ID as fare media. Graduate students and employees would have been required to purchase other valid fare media, with UC Davis proposing to subsidize a portion of employee fare purchases.

However, this proposal presented logistical difficulties with implementation, as it would be difficult to distinguish Causeway Connection fare purchases from purchases of SacRT or YCTD fare media for use on other services since the same fare media is generally used on all services. UC Davis does not have the budgetary resources to provide a transit subsidy for all YCTD or SacRT services.

Under the approach implemented in May, SacRT honors the UC Davis ID as a valid fare on the Causeway Connection and UC Davis pays the gross operating cost, without deduction of fare revenue. This achieves the intended approximate 50 percent cost share for UC Davis. At the same time, it increases ridership, by reducing the cost for most employees from \$35 per month to zero. SacRT does not receive any less revenue than was intended, i.e., the service remains 100 percent funded by UC Davis and the CMAQ grant, except for a small match that SacRT committed separately for more frequent service.

The analysis also examines alternative approaches where UC Davis ID holders would be required to paya small fee for their passes to avoid the statistically significant disparate impact/disproportionate burden. However, while that approach would result in a clear negative financial impact to all groups of Causeway Connection riders (including the estimated 40% who are minority and 5.7% that are low-income), it offers no corresponding increased financial benefit to SacRT because, under the terms of the MOU, the UC Davis operating subsidy would simply be reduced to reflect the fare revenue. Therefore, increasing the cost for Causeway Connection riders harms those who are minority or low-income riders of the service and potentially dissuades them from riding, while not providing any overall benefit to users of the remainder of the SacRT service. The analysis therefore finds that the proposed change (i.e., continuation of the existing demonstration program) is both justifiable, in the interest of maximizing ridership and reducing the cost to the individual to ride, at no cost to SacRT, as well as offering the maximum benefit for disadvantaged populations.

<u>Justification</u> – The "program goal" of the CMAQ operating assistance being used for the Causeway Connection is to help start up viable new transportation services that can demonstrate air quality benefits and eventually cover costs as much as possible. Other funding sources should supplement and ultimately replace CMAQ funds for operating assistance, as these projects no longer represent additional, net air quality benefits but have become part of the baseline transportation network. Allowing the UC Davis graduate and employee IDs to be recognized during this start up period will build a ridership base that increases the likelihood of continued viability of the service beyond the funded period and also increases the likelihood that UC Davis will remain a funding partner beyond the 3-year period.

The Title VI merits of the new fare therefore rest on the merits of the Causeway Connection service itself. The SacRT Board of Directors resolved on December 9, 2019, that there was a substantial legitimate justification for the service, because (1) the only alternative was to abort the entire service, which was fully-funded, and (2) that the Causeway Connection effectively migrated funding from a private, closed-door service exclusively for UC Davis affiliates to an open-door public transit service, providing benefits to the population at large that would not exist without the service.

Attachment 1 Public Notice and Public Comment

Public Notices





SacRT Seeking Comments on Title VI Fare Equity Analysis

Click Here to Read the Report

The Sacramento Regional Transit District is seeking comments on a transit fare analysis, prepared in accordance with Title VI of the Civil Rights Act of 1964. The report is available for review at sacrt.com. It includes an analysis of a free ride program for affiliates of the University of California, Davis for use on the Causeway Connection intercity express bus route.

Please address comments to:

SacRT Planning Dept. Attn: James Drake P.O. Box 2110 Sacramento, CA 95812-2110

Phone:

SacRT Customer Advocacy Dept (916) 557-4545

Email:

customeradvocacy@sacrt.com

All comments will be provided to the SacRT Board of Directors prior to approval of the final analysis. The deadline for written comments to be included in the board packet is October 19, 2020. All comments will be provided to the SacRT Board of Directors at their regular meeting scheduled for October 26, 2020 at 5:30 p.m. Members of the public may also provide written comments to the SacRT Board of Directors meeting via SacRT's

board clerk on the day of the meeting; however, comments submitted this way will are limited to 250 words and will not be printed in the agenda item. Please visit sacrt.com for more information on board meeting accommodations for the COVID-19 pandemic.

Please visit sacrt.com to review fare changes for SacRT.

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Attachment 1 Rack Cards

Front Back

Regional Transit Title VI Fare Analysis Available for 30-Day Review The Sacramento Regional Transit District is seeking comments on a transit fare analysis, prepared in accordance with Title VI of the Civil Rights Act of 1964. The report is available for review at sacrt. com. It includes an analysis of a free ride program for affiliates of the University of California, Davis for use on the Causeway Connection intercity express bus route. All comments will be provided to the SacRT Board of Directors prior to approval of the final analysis. The deadline for written comments to be included in the board packet is October 19, 2020. All comments will be provided to the SacRT Board of Directors at their regular meeting scheduled for October 26, 2020 at 5:30 p.m. Members of the public may also provide written comments to the SacRT Board of Directors meeting via SacRT's board clerk on the day of the meeting; however, comments submitted this way will are limited to 250 words and will not be printed in the agenda item. Please visit sacrt.com for more information on board meeting accommodations for the COVID-19 pandemic. Please visit sacrt.com to review fare changes for SacRT.



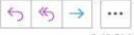
Attachment 1

Public Notices

Next Stop News - October 2020



Sacramento Regional Transit District <devra@sacrt.ccsend.com



3;46 PM

To James Drake

(1) You forwarded this message on 9/30/2020 4:51 PM.

SacRT Seeking Comments on Title VI Fare Equity Analysis

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Please address comments to:

SacRT Planning Dept. Attn: James Drake P.O. Box 2110 Sacramento, CA 95812-2110

Phone:

Comments: 916-557-4545

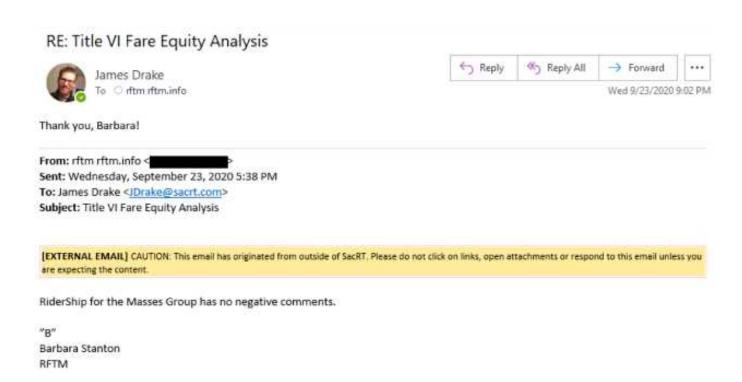
Language Assistance: 916-557-4545

Email:

customeradvocacy@sacrt.com

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Attachment 1 Public Comment



would have a less disparate impact on minority riders but would still accomplish SacRT's legitimate program goals; and

THAT, the Board of Directors therefore finds that there is a substantial legitimate justification and no viable alternatives to continue acceptance of a current University of California, Davis graduate student identification card or a current University of California, Davis employee ID bearing the name and likeness of the individual presenting as a valid Fare Equivalent on the Causeway Connection fixed-route bus service.

STEVE HANSEN, Chair

ATTEST:

HENRY LI, Secretary

Cindy Brooks, Assistant Secretary



Title VI Fare Equity Analysis Causeway Connection Free Ride Program

October 26, 2020

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- 2. Project Description
- 3. Title VI Requirements
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- 7. Results of Changes
- 8. Findings
- 9. Justification, Alternatives, and Mitigation

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- 3. Existing Low-Income Average Fare
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- 7. Percent Change in Systemwide Average Fare
- 8. Potential Disparate Impacts and/or Disproportionate Burdens

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 4, 2020, SacRT launched a new route, Route 138, the Causeway Connection, an intercity express bus between Sacramento and Davis. The Causeway Connection is operated jointly with the Yolo County Transportation District (Yolobus). Approximately half of operating costs are covered by the University of California – Davis (UCD). The remaining operating costs are primarily covered by a Congestion Mitigation and Air Quality (CMAQ) grant awarded for the multi-agency project. New electric buses were also provided to SacRT and Yolobus by Electrify America (EA) as part of the project. The agreement between the project partners included a pass program for UCD affiliates. The Title VI ramifications of the pass program are the subject of this report.

<u>Original Plan</u> - The new Causeway Connection service itself, including a Title VI service equity analysis, was approved by the SacRT Board of Directors on December 9, 2019, following a 30-day public review. At that time, a Title VI fare equity analysis was also approved for a fare change to allow UCD undergraduate students to ride for free. UCD was also expected at that time, to pay part of the out-of-pocket cost for UCD employees and graduate students to purchase ordinary SacRT fare media.

Revised Plan - On March 23, 2020, the SacRT Board approved a change to the original fare change. Under the new plan, free riding privileges on the Causeway Connection would be extended to all UC Davis ID holders, i.e., undergraduates, graduate students, and employees. This fare change took effect on May 4, 2020 with the beginning of the Causeway Connection service and has been treated as a six-month demonstration project. The project partners desire to continue the UC Davis ID fare program for the life of the three-year agreement for the Causeway Connection service. To do so requires passage of a Title VI fare change analysis which is the subject of this draft report.

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.³

Prior to any fare changes being approved permanently, the Board of Directors must approve the findings of a Title VI fare equity analysis. Prior to approving a Title VI fare equity analysis, SacRT policy requires that a draft analysis of the proposed changes (this report) 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 is publishing this draft analysis and intends to present a final version, including the comments received, to the SacRT Board of Directors on October 26, 2020.

³ See FTA Circular 4702.1B, Chapter IV, Section 7 and RT Fare Change Policies (Resolution No. 15-11-0129).

4. Definitions

<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, or mixed race.

<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. Survey participants were asked their household size and their household income from a list of ranges. For the purposes of this survey, the participant's income is assumed to be the midpoint of the range selected.⁴



⁴ For example, if a passenger selected a household income range of \$25,000 to \$35,000, that passenger's income was assumed to be \$30,000 for the purposes of this analysis.

5. Baseline Data

<u>Census Data</u> – Based on Census data, the SacRT service area is 53.2 percent minority and 20.1 percent low-income. This data is used for the sake of context, but transit riders make up a small, non-representative fraction of the overall population, so it is not directly relevant to most Title VI service or fare equity analyses.

On-Board Survey – SacRT customers are estimated to be 72.3 percent minority and 55.8 percent low-income. This data comes from a statistically valid passenger survey conducted in April 2013 covering all bus and light rail routes. Although this data is somewhat outdated, it is still the best available data on actual customers. SacRT was in the process of updating this survey in March 2020; however, surveying had to be suspended due to the outbreak of COVID-19, so 2013 survey data continues to be the most recent data.

Figure 1
Existing SacRT Demographics

	SacRT	SacRT
	Service Area	Customers
Minority	53.2%	72.3%
Low-Income	20.1%	55.8%

<u>Fare Survey</u> – On an annual basis, SacRT conducts a passenger fare survey. This survey does not require questionnaires; SacRT surveyors merely inspect passenger fares at the time of boarding. This provides ridership volumes for each fare type. Combined with the 2013 survey data, this allows SacRT to estimate the average fare for minority and low-income populations, which is the key statistic for Title VI analyses.

Because of the COVID-19 pandemic, the most recent fare survey data is from early 2019. Those survey responses have been projected over pre-COVID ridership totals to estimate what the average fare would have been without the major changes to ridership from COVID. The actual impacts to ridership from COVID cannot be known until it is safe to resume surveying, so SacRT believes this is the most reasonable analysis.

Figure 2
Existing Minority Average Fare

	Fare Revenue	Passenger Boardings	Average Fare
Minority	\$19,593,175	15,768,345	\$1.24
Non-Minority	\$8,995,491	6,741,462	\$1.33
Total	\$28,588,666	22,509,807	\$1.27

Minority riders currently pay an average of \$1.24 per boarding, compared to \$1.33 for non-minority riders.

Figure 3
Existing Low-Income Average Fare

	Fare Revenue	Passenger Boardings	Average Fare
Low Income	\$13,854,614	11,295,467	\$1.23
Non-Low Income	\$14,734,052	11,214,340	\$1.31
Total	\$28,588,666	22,509,807	\$1.27

Low-income riders pay an average of \$1.23 per boarding compared to \$1.31 for non-low-income riders.

6. Demographics of New Fare Type

<u>Prior Analysis</u> – For the Title VI analysis of the Causeway Connection service, SacRT used data from UCD on its students and employees, which were 23.7 percent minority and 36.4 percent low-income. For the fare program, as envisioned at the time, data on the UCD undergraduate population was used indicating undergraduates were 72.0 percent minority and 58.7 percent low-income.

As discussed above, census data was not applicable to the analysis, because transit riders make up a small, non-representative fraction of the overall population. This is especially so for an intercity express route, such as the Causeway Connection, which is likely to attract riders from an unusually broad geographic area (e.g., Solano County residents driving to Davis to catch the bus the rest of the way into Sacramento).

<u>Special Survey</u> – Due to the shortcomings of the existing data, SacRT intended to conduct an inperson passenger survey on the Causeway Connection during the six-month promotional period for the new UC Davis ID fare type; however, the COVID pandemic prevented SacRT from conducting an in-person survey. As an alternative, SacRT conducted this survey electronically.

Many Causeway Connection riders (or likely future riders) were known to be former riders of a former UCD-operated intercampus shuttle. Multiple mailing lists were available to reach these customers, including a UCD-maintained mailing list of approximately 400-500 persons and a ridermaintained mailing list of similar size. Using these channels, an online survey was conducted in August 2020 which captured over 200 responses.

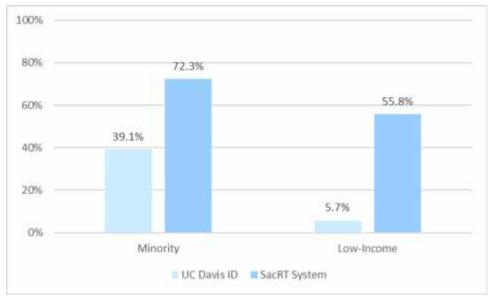
The online survey found that likely users⁵ of the UC Davis ID free ride program are 39.1 percent minority and 5.7 percent low-income, both well below SacRT system averages of 72.3 percent and 55.8 percent.

SacRT Title VI Program Update - 2023

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⁵ Likely users of the UC Davis ID are considered to be respondents indicating they have already ridden or plan to ride the Causeway Connection when it ramps up to full service and that have identified that they are UC Davis affiliates with a UC Davis ID card. There were 174 such respondents.





<u>Utilization</u> – Boardings on the UC Davis ID are estimated at 127,000 per year, 63,500 on SacRT. All such riders would pay zero out of pocket cost to ride. Of those riders, an estimated 24,816 would be minority riders and 3,649 would be low-income riders.

Figure 5
Ridership Using UC Davis ID

	Percent	Boardings
Minority	39.1%	24,816
Non-Minority	60.9%	38,684
	100.0%	63,500
	Percent	Boardings
Low Income	5.7%	3,649
Non-Low Income	94.3%	59,851
	100.0%	63,500

Figure 6
Change in Systemwide Average Fare

Minority	Fare <u>Revenue</u>	<u>Boardings</u>	Average <u>Fare</u>
Existing	\$19,593,175	15,768,345	\$1.24
Additional	\$0	24,816	\$0.00
New	\$19,593,175	15,793,161	\$1.24
	Fare		Average
Non-Minority	Revenue	<u>Boardings</u>	<u>Fare</u>
Existing	\$8,995,491	6,741,462	\$1.33
Additional	\$0	38,684	\$0.00
New	\$8,995,491	6,780,146	\$1.33
	Fare		Average
Low Income	<u>Revenue</u>	<u>Boardings</u>	<u>Fare</u>
Existing	\$13,854,614	11,295,467	\$1.23
Additional	\$0	3,659	\$0.00
New	\$13,854,614	11,299,116	\$1.23
	_		
Non-Low Income	Fare <u>Revenue</u>	Boardings	Average <u>Fare</u>
Existing	\$14,734,052	11,214,340	\$1.31
Additional	\$0	59,851	\$0.00
New	\$14,734,052	11,274,191	\$1.31

7. Results of Changes

The UC Davis ID provides a significant discount (i.e., allowing the user to ride for free) to a group of riders that is very low in minority and low-income representation but that is overall a small part of SacRT ridership.

Because of the small number of users, the systemwide average fare would decrease by less than \$0.01 for each demographic group. However, there are notable differences in the percent change by demographic group. Title VI impacts are determined by comparing these percent changes.

Figure 7
Percent Change in Systemwide Average Fare

Rider Type	Existing	Proposed	Change	% Change
Minority	\$1.243	\$1.241	(\$0.002	-0.16%
Non-Minority	\$1.334	\$1.327	(\$0.008)	-0.57%
Low-Income	\$1.227	\$1.226	(\$0.000)	-0.03%
Non-Low-Income	\$1.314	\$1.307	(\$0.007)	-0.53%

For a fare reduction, the goal is for the average fare to decrease as much or more for minority populations as for non-minority populations. This is not the case, as non-minority riders would pay 0.57 percent less, compared to only 0.16 percent less for minority populations.

The goal is also for the average fare for low-income populations to decrease as much or more as for non-low-income populations. This is also not the case, as non-low-income populations would pay 0.53 percent less, compared to only 0.03 percent less for low-income populations.

The statistical significance of these results is discussed in the next section.

8. Findings

SacRT uses 20 percent as a threshold for statistical significance. The difference in the percent change in the average fare for non-minority riders (0.57 percent) and minority riders (0.16 percent) is both adverse and exceeds 20 percent; therefore, there may be potential disparate impacts (DI) to minority populations from the new fare.

Figure 8

Potential Disparate Impacts and/or Disproportionate Burdens

a. Percent decrease in non-minority avg fare	-0.57%
b. Threshold of statistical significance (80% * a)	-0.46%
c. Percent decrease in minority avg fare	-0.16%
d. Do fares decrease more for non-minority populations? ($a < c$)	Yes
e. Is there evidence of a potential disparate impact (c > b)	Yes
f. Percent decrease in non-low-income avg fare	-0.53%
g. Threshold of statistical significance (80% * f)	-0.42%
h. Percent decrease in low-income avg fare	-0.03%
i. Do fares decrease more for non-low-income populations? ($f < h$)	Yes
j. Is there evidence of a potential disproportionate burden? ($h > g$)	Yes

The difference in the percent change in the average fare for non-low income riders (0.53 percent) and low-income riders (0.03 percent) is also adverse and exceeds 20 percent; therefore, there may be potential disproportionate burdens (DB) on low-income populations from the new fare.

9. Justification, Alternatives, and Mitigation

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>Alternatives</u> – When the Causeway Connection service was being planned, the partners agreed that UCD would pay approximately half the operating cost of the service, net of fare revenue. The partners intended to allow free rides for undergraduate students only. Graduate students and employees would also have been required to pay the ordinary fare, with UCD paying for a portion of employee fare purchases.

The partners later realized that this obligated UCD to subsidize the purchase of an *unlimited* number of passes. Not all of the sales revenue from the passes could justifiably be credited back to UCD against their bill for operating support, because the passes would be valid on the entire SacRT system. The original plan therefore committed UCD to potentially have to overspend its total intended commitment of approximately half of net operating costs.

To protect UCD from cost overruns, the partners conceived a new approach, which is what this report analyzes. Under the new approach, SacRT simply honors the UC Davis ID as a valid fare on the Causeway Connection. This achieves the intended approximate 50 percent cost share for UCD. At the same time, it increases ridership, by reducing the cost for most employees from \$35 per month to zero. SacRT does not receive any less revenue than was intended, i.e., the service remains 100 percent funded by others, except for a small match that SacRT had committed separately.

<u>Justification</u> – If SacRT were to discontinue the UC Davis ID pass program and require a regular fare from UCD employees and graduate students, putting aside the likely ridership loss, SacRT would collect more fare revenue, but operating support from UCD would decrease commensurately. Therefore, there would be financial advantage to SacRT; however, assuming UCD fulfilled its pledge subsidize passes for employees and graduate students, this would likely result in a significant cost overrun for UCD. This could jeopardize UCD's willingness and ability to remain a funding partner.

The Title VI merits of the new fare therefore rest on the merits of the Causeway Connection service itself. The SacRT Board of Directors resolved on December 9, 2019 that there was a substantial legitimate justification for the service, because (1) the only alternative was to abort the entire project, which was fully-funded, and (2) that the Causeway Connection effectively migrated funding from a private, closed-door service exclusively for UCD affiliates to an opendoor public transit service, providing benefits to the population at large that would not exist without the project.

On this basis, SacRT believes that there is a substantial legitimate justification for the new UC Davis ID fare type.



Title VI Fare Equity Analysis Elk Grove and Cal ITP Fares

December 13, 2021

RESOLUTION NO. 21-12-0131

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

December 13, 2021

APPROVING A TITLE VI FARE EQUITY ANALYSIS

WHEREAS, the Board of Directors desires to make permanent multiple fare changes, previously approved on a temporary basis of no more than six months, including an On-Board Single Ride Fare, On-Board Discount Single Ride Fare, and a number of Elk Grove only fares; and

WHEREAS, a Title VI fare equity analysis of the proposed fare changes has been prepared, was made available for public review on November 10, 2021 for a 30-day comment period, and was publicized in accordance with SacRT's Fare Change Policy (Resolution No. 15-11-0129); and

WHEREAS, the Title VI fare equity analysis found potential disparate impacts to minority populations from creating new fare types for Elk Grove transit service; and

WHEREAS, the Title VI fare equity analysis found no potential disparate impacts to minority populations from creating the On-Board Single Ride Fare or On-Board Discount Single Ride Fare and no potential disproportionate burdens to low-income populations from any of the proposed fare changes, but did find a potential disparate impact to minority populations from the creation of the several Elk Grove transit fares;

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

THAT, the Board of Directors is aware of, and has reviewed the Title VI equity analysis and has reviewed and taken into consideration public comments about the analysis; and

THAT, the Board of Directors has considered alternatives to the proposed fare change and found that none of the considered alternatives would have a less disparate impact on minority riders but still accomplish SacRT's legitimate program goals, as described in the Title VI equity analysis; and

THAT, the Board of Directors therefore finds that there is a substantial legitimate justification to implement the proposed fare changes as specified in the Title VI equity analysis; and

THAT the Board of Directors approves the Title VI equity analysis set forth in Exhibit ${\sf A}.$

STEVE MILLER, Chair

ATTEST:

HENRY LI, Secretary

Tahetha Smith Assistant Secretary

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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 two fare changes:

<u>Elk Grove Fares</u> - On July 1 2021, SacRT assumed ownership and management of transit service (eTran) formerly owned and managed by the City of Elk Grove (City), by way of the City's annexation into SacRT.

While the fares for the eTran service were left unchanged, an amendment to the SacRT fare structure was required to add new fare types and pricing not previously offered by SacRT, which was done by action of the Board of Directors on June 14, 2021, to be implemented on July 1, 2021. Under a transfer agreement in place between the City and SacRT prior to annexation, many of SacRT's fare types were already accepted for eTran service (single fare, daily pass, monthly pass, group passes). The fares that were temporarily adopted by the SacRT Board in June 2021 are generally fare types that were not duplicated by the SacRT fare structure (for instance, a pass valid for 31 days rather than SacRT "Monthly Pass" that is valid for a specified calendar month), as well as some fares that are nominally lower than the SacRT fares but are only valid on specified former eTran routes (commuter routes to downtown Sacramento and service operating primarily within the City of Elk Grove). For instance, an "Elk Grove Daily Pass" purchased for \$6.00 is valid only for eTran service, while a "Daily Pass" purchased for \$7.00 provides access to all SacRT services and modes, as well as access services provided by the Yolo County Transportation District. Since all SacRT fare types are also accepted, a patron using eTran service can choose the fare type that best meets their needs.

While not "new" for the service, the fare types were a "change" for SacRT. FTA Title VI Circular 4702.1B requires a fare equity analysis for all "fare changes" lasting longer than six months. SacRT intends to continue these fare types.

On-Board Light Rail Single Ride Fare – On June 29, 2021, SacRT introduced a new fare as part of a test of integrated statewide electronic ticketing, led by the California Integrated Travel Project (Cal-ITP). As a testing partner, SacRT installed contactless card reader devices in several of its light rail trains and began accepting payment of a transit fare through these devices, beginning with the Green Line, on June 29, 2021, and expanding to all light rail lines on September 1, 2021. Only one pricing option is currently available through this mechanism: a 90-minute light rail-only fare priced at \$2.50 and available to the general public; however, the Board also temporarily approved an On-Board Light Rail Discount Single Ride Fare of \$1.25. Purchase is made via a contactless device placed on each light rail vehicle which can read credit cards and smart phones. SacRT intends to continue the \$2.50 fare at least beyond the 6-month period ending December 28, 2021 and therefore must prepare a Title VI analysis of that fare. SacRT has not yet determined if or when the \$1.25 On-Board Light Rail Discount Single Ride Fare will be implemented, but this analysis also examines that fare type.

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.⁶

Prior to any fare changes being approved permanently, the Board of Directors must approve the findings of a Title VI fare equity analysis. Prior to the Board of Directors approving a Title VI fare equity analysis, SacRT policy requires that: a draft analysis of the proposed changes (this report) be made available for a 30-day public review period; members of the public be invited to comment; and staff and the Board of Directors take public comments into consideration. In accordance with these requirements, SacRT published a draft analysis on November 10, 2021, and is presenting this final version, including comments received, to the SacRT Board of Directors on December 13, 2021.

4. Definitions

<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, or mixed race.

<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. 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.⁷

5. Baseline Data

<u>Census Data</u> – Based on Census data, the SacRT service area is 55.3 percent minority and 14.6 percent low-income. This data is used for the sake of context, but transit riders make up a small, non-representative fraction of the overall population, so it is not directly relevant to most Title VI service or fare equity analyses.

On-Board Survey – Without consideration of the new service area added by the Elk Grove annexation, SacRT customers are estimated to be 72.3 percent minority and 55.8 percent low-income. This data comes from a statistically valid passenger survey conducted in April 2013 covering all bus and light rail routes. Although this data is somewhat outdated, it is still the best available data on actual customers. SacRT was in the process of updating this survey in March 2020; however, surveying had to be suspended due to the outbreak of COVID-19, so 2013 survey data continues to be the most recent data. The eTran riders were included in the 2013 survey as a separate group and their composition is discussed in Section 6 below.

⁶ See FTA Circular 4702.1B, Chapter IV, Section 7 and RT Fare Change Policies (Resolution No. 15-11-0129).

⁷ 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.

<u>Fare Survey</u> – On an annual basis, SacRT conducts a passenger fare survey, which provides ridership volumes for each fare type. Combined with the 2013 survey data, this allows SacRT to estimate the average fare for minority and low-income populations, which is the key statistic for Title VI analyses.

Because of the COVID-19 pandemic, the most recent fare survey data is from early 2019. Those survey responses have been projected over pre-COVID ridership totals to estimate what the average fare would have been without the major changes to ridership from COVID. The actual impacts to customer demographics from COVID cannot be known until it is safe to resume surveying. Until that time, SacRT believes this is the most reasonable way to approximate the demographic composition of SacRT's ridership by fare type paid.

Figure 1
Existing SacRT Demographics

Y		
	SacRT	SacRT
	Service Area	Customers
Minority	55.3%	72.3%
Low-Income	14.6%	55.8%

SacRT Service Area demographics computed November 2021. SacRT Customer demographics based on 2013 on-board survey, excluding Folsom and Elk Grove.

Figure 2
Existing Minority Average Fare

	Fare Revenue	Passenger Boardings	Average Fare
Minority	\$19,593,175	15,768,345	\$1.24
Non-Minority	\$8,995,491	6,741,462	\$1.33
Total	\$28,588,666	22,509,807	\$1.27

Minority riders currently pay an average of \$1.24 per boarding, compared to \$1.33 for non-minority riders.

Figure 3
Existing Low-Income Average Fare

	Fare Revenue	Passenger Boardings	Average Fare
Low Income	\$13,854,614	11,295,467	\$1.23
Non-Low Income	\$14,734,052	11,214,340	\$1.31
Total	\$28,588,666	22,509,807	\$1.27

Low-income riders pay an average of \$1.23 per boarding compared to \$1.31 for non-low-income riders.

6. Demographics of New Fare Types

<u>Elk Grove Fares</u> – Although splits are not available by fare type, the 2013 on-board survey included eTran service and found that eTran riders were 81 percent minority and 25 percent low-income. This makes eTran riders slightly more likely than all SacRT customers to be minority, but about half as likely to be low-income, as shown in Figure 4.

Figure 4
Elk Grove and SacRT Customer Demographics

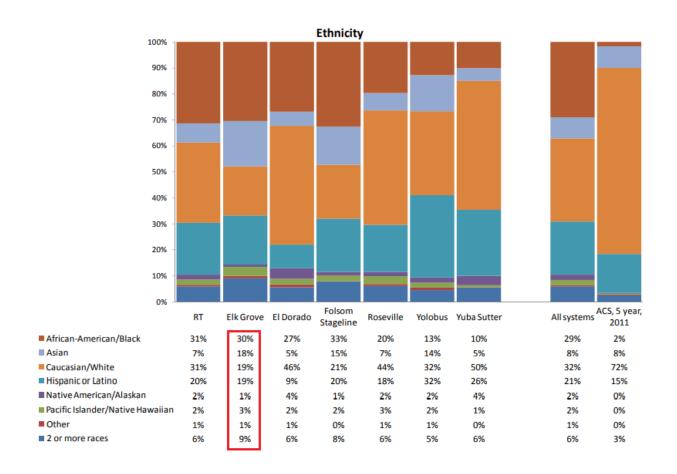
	Minority	Low-Income
Elk Grove Customers	81%	25%
SacRT Customers (2013 Survey)	69%	55%
SacRT Customers (2019 Survey)	72.3%	55.8%

On-Board Light Rail Single Ride Fare – Demographics are not known, however, staff has assumed that users of the On-Board Light Rail Single Ride Fare would be demographically similar to existing users of the single ride light rail ticket, which is identical in pricing and similar in use cases. Users of that ticket are 48.7 percent minority and 5.5 percent low-income. These are among the lowest minority and low-income splits for any fare type (since this fare type requires possession of a contactless credit card, it is logical to assume that, if anything, these users are even less likely to be minority or low-income, but that hasn't been validated). Demographics of the On-Board Light Rail Discount Single Ride Fare may likewise be comparable to users of the existing discount single ride ticket, who are 45.5 percent minority and 30.0 percent low-income, both below SacRT averages, although not as extreme for the low-income category.

Figure 5
Light Rail Single Ride User Demographics

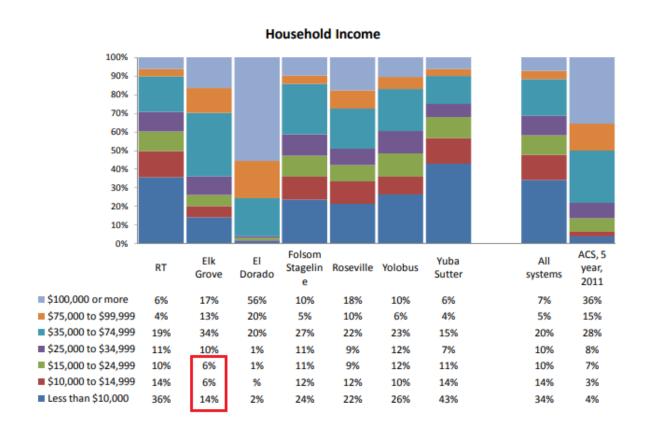
	Minority	Low-Income
Single Ride Light Rail Ticket		
Assumed to be similar to	48.7%	5.5%
On-Board Light Rail Single Ride Fare		
Discount Single Ride Light Rail Ticket		
Assumed to be similar to	45.5%	30.0%
On-Board Light Rail Discount Single Ride Fare		

Figure 6



Source: On-Board Survey (2013)

Figure 7



Source: On-Board Survey (2013)

Figure 8

Poverty Level Analysis for All Systems								
	Which system was respondent riding when surveyed?							
Poverty level income estimate - uses mid point in income ranges from Q20	RT	Elk Grove	El Dorado	Folsom Stageline	Roseville	Yolobus	Yuba Sutter	Results for all seven systems combined
Poverty: Less than \$10,000, any household size, one or more persons	37%	14%	2%	24%	22%	27%	44%	35%
Poverty: \$10 to \$14,999 (mid point \$12,500) & HH size 2 or more persons	11%	6%	0%	11%	7%	8%	10%	11%
Poverty: \$15 to \$24,999 (mid point \$20,000) & HH includes 4 or more persons	4%	3%	0%	5%	2%	5%	5%	4%
Poverty: \$25-\$34,999 (mid point \$30,000) & HH includes 6 or more persons	1%	2%	0%	2%	1%	1%	1%	1%
Poverty: \$35,000 to \$44,999 (mid point \$40,000) & HH includes 9 or more persons	0%	0%	0%	0%	0%	0%	0%	0%
Above poverty: \$10 to \$14,999 (midpoint \$12,500) & HH includes only one person	2%	0%	0%	1%	5%	2%	3%	2%
Above poverty: \$15-\$24,999 (mid point \$20,000) & HH includes 3 or fewer persons	6%	2%	1%	7%	6%	7%	6%	6%
Above poverty: \$25-\$34,999 (mid point \$30,000) & HH includes 5 or fewer persons	9%	8%	1%	9%	7%	10%	6%	9%
Above poverty: \$35-\$44,999 (mid point \$40,000), & HH includes fewer than 9 persons	7%	7%	6%	7%	5%	8%	4%	7%
Above poverty: \$45-\$54,999 (mid point \$50,000), no HH size criterion	6%	10%	5%	7%	5%	8%	4%	6%
Above poverty: \$55-\$74,999 (mid point \$65,000), no HH size criterion	7%	16%	10%	14%	12%	6%	7%	7%
Above poverty: \$75-\$99,999 (mid point \$\$87,500), no HH size criterion	4%	13%	20%	5%	10%	7%	4%	5%
Above poverty: \$100,000 or more, no HH size criterion	6%	17%	56%	10%	18%	11%	6%	7%
Total percent below poverty level income	53%	25%	2%	42%	32%	41%	60%	51%
Total percent above poverty level income	47%	73%	99%	60%	68%	59%	40%	49%

Source: On-Board Survey (2013)

7. Analysis and Findings

<u>Elk Grove Fares</u> – Splits are not available for the various Elk Grove fare types; however, it is known from the 2013 On-Board Survey that overall, eTran riders were 81 percent minority and 19 percent low-income. Total ridership and fare revenue is also known for eTran service, and has been used for the sake of analysis of the Elk Grove fares. Although the base fare for eTran and for SacRT's Elk Grove service is \$2.25, lower than the basic SacRT fare of \$2.50, due to fewer discount programs, the aggregate average fare for eTran was \$1.57, higher than the systemwide SacRT average fare of \$1.27. Therefore, creation of the Elk Grove fare types will be expected to increase the SacRT average fare. Inferences can also be made about how SacRT's minority and low-income splits will change.

Figure 9
Minority Splits for Elk Grove Fares

	Percent of Boardings	Fare Revenue	Passenger Boardings
Minority	81.0%	\$931,576	594,938
Non-Minority	19.0%	\$218,518	139,553
Total	100.0%	\$1,150,094	734,491

Figure 10

Low-Income Splits for Elk Grove Fares

	Percent of Boardings	Fare Revenue	Passenger Boardings
Low-Income	25.0%	\$287,524	183,623
Non-Low-Income	75.0%	\$862,571	550,868
Total	100.0%	\$1,150,094	734,491

Figure 11
Change to Systemwide Statistics
From Elk Grove Fares

Fare Revenue	Boardings	Average Fare
\$19,593,175	15,768,345	\$1.243
\$931,576	594,938	\$1.566
\$20,524,751	16,363,283	\$1.254
n/a	n/a	\$0.011
n/a	n/a	0.885%
Fare Revenue	Boardings	Average Fare
\$8,995,491	6,741,462	\$1.334
\$218,518	139,553	\$1.566
\$9,214,009	6,881,015	\$1.339
n/a	n/a	\$0.005
n/a	n/a	0.375%
Fare Revenue	Boardings	Average Fare
\$13,854,614	11,295,467	\$1.227
\$287,524	183,623	\$1.566
\$14,142,138	11,479,090	\$1.232
n/a	n/a	\$0.005
n/a	n/a	0.407%
Fare Revenue	Boardings	Average Fare
\$14,734,052	11,214,340	\$1.314
\$862,571	550,868	\$1.566
\$15,596,623	11,765,208	\$1.326
n/a	n/a	\$0.012
n/a	n/a	0.913%
	\$19,593,175 \$931,576 \$20,524,751 n/a n/a Fare Revenue \$8,995,491 \$218,518 \$9,214,009 n/a n/a Fare Revenue \$13,854,614 \$287,524 \$14,142,138 n/a n/a Fare Revenue \$14,734,052 \$862,571 \$15,596,623 n/a	\$19,593,175

As shown in Figures 9, 10, and 11, addition of the Elk Grove fares would likely increase SacRT's average fare systemwide, and for all minority and low-income splits. However, because of the demographics of Elk Grove fare users, it will increase more for minority populations and for non-low-income populations, as summarized Figure 12.

Figure 12

Percent Change in Systemwide Average Fare

From Elk Grove Fares

Rider Type	Existing	Proposed	Change	% Change
Minority	\$1.243	\$1.254	\$0.011	0.885%
Non-Minority	\$1.334	\$1.339	\$0.005	0.375%
Low-Income	\$1.227	\$1.232	\$0.005	0.407%
Non-Low-Income	\$1.314	\$1.326	\$0.012	0.913%

SacRT uses a threshold of 20 percent to determine statistical significance for disparate impact analysis (e.g., does the minority fare increase by more than 20% more than the non-minority fare increase). As shown in Figure 13, the increase in the minority average fare would be statistically significant. Therefore, there is a potential disparate impact on minority populations from adding the Elk Grove fare types. Because the low-income fare would increase less than the non-low-income fare, there is no potential disproportionate burden on low-income populations.

Figure 13

Potential Disparate Impacts and/or Disproportionate Burdens

From Elk Grove Fares

a. Percent increase in non-minority avg fare	0.375%
b. Threshold of statistical significance (120% * a)	0.450%
c. Percent increase in minority avg fare	0.885%
d. Do fares increase more for minority populations? (c > a)	Yes
e. Is there evidence of a potential disparate impact (c > b)	Yes
f. Percent increase in non-low-income avg fare	0.913%
g. Threshold of statistical significance (120% * f)	1.096%
h. Percent increase in low-income avg fare	0.407%
i. Do fares increase more for low-income populations? (h > f)	No
j. Is there evidence of a potential disproportionate burden? (h > g)	No

On-Board Light Rail Single Ride Fare – Ridership on the On-Board Light Rail Single Ride Fare has averaged 10.5 boardings per day since September 1, 2021, on pace for 3,833 per year. Minority, non-minority, low-income, and non-low-income splits are presented in Figures 14 and 15.

Figure 14
Minority Splits for On-Board Light Rail Single Ride Fare

	Percent of Boardings	Fare Revenue	Passenger Boardings
Minority	48.7%	\$4,667	1,867
Non-Minority	51.3%	\$4,916	1,966
Total	100.0%	\$9,583	3,833

Figure 15
Low-Income Splits for On-Board Light Rail Single Ride Fare

	Percent of Boardings	Fare Revenue	Passenger Boardings	
Low-Income	Low-Income 5.5%		211	
Non-Low-Income	94.5%	\$9,055	3,622	
Total	100.0%	\$9,583	3,833	

Figure 16
Change to Systemwide Statistics
From On-Board Light Rail Single Ride Fare

Minority	Fare Revenue	Boardings	Average Fare
Before	\$19,593,175	15,768,345	\$1.243
New Boardings	\$4,667	1,867	\$2.500
After	\$19,597,842	15,770,212	\$1.243
Change in Avg Fare	n/a	n/a	\$0.000
% Change in Avg Fare	n/a	n/a	0.000%
Non-Minority	Fare Revenue	Boardings	Average Fare
Before	\$8,995,491	6,741,462	\$1.334
New Boardings	\$4,916	1,966	\$2.500
After	\$9,000,407	6,743,428	\$1.335
Change in Avg Fare	n/a	n/a	\$0.001
% Change in Avg Fare	n/a	n/a	0.075%
Low-Income	Fare Revenue	Boardings	Average Fare
Before	\$13,854,614	11,295,467	\$1.227
New Boardings	\$527	211	\$2.500
After	\$13,855,141	11,295,678	\$1.227
Change in Avg Fare	n/a	n/a	\$0.000
% Change in Avg Fare	n/a	n/a	0.000%
Non-Low-Income	Fare Revenue	Boardings	Average Fare
Before	\$14,734,052	11,214,340	\$1.314
New Boardings	\$9,055	3,622	\$2.500
After	\$14,743,107	11,217,962	\$1.314
Change in Avg Fare	n/a	n/a	\$0.000
% Change in Avg Fare	n/a	n/a	0.000%

Since the On-Board Light Rail Single Ride Fare of \$2.50 is greater than the systemwide average fare of \$1.27 and all the minority and low-income splits, disproportionate use of it by any group will tend to increase the average fare for that group. Assuming users of the On-Board Light Rail Single Ride Fare most closely resemble the users of the single ride light rail ticket, this will tend to disproportionately raise the average fare for non-minority and non-low-income riders and thus have no Title VI impacts.

As shown in Figure 16, using these assumptions, and after rounding to a tenth of a cent, the impacts of the On-Board Light Rail Single Ride Fare are too minor to have a measurable numerical impact on any systemwide average fare splits, except for raising the non-minority fare. Without rounding, the non-low-income fare would also increase more than the low-income fare. This supports the supposition that the effects of the new fare are both minor, and to the extent that they are relevant, that they would be more adverse to non-minority and non-low-income populations.

Note also that the On-Board Light Rail Single Ride Fare is not an increase nor a replacement of an existing fare type, so in practice, it is unlikely to be used by anyone other than experimentally (presumably by a customer who could afford to do so) or as a convenient substitute for the equally-priced single ride ticket.

No ridership data exists for the On-Board Light Rail Discount Single Ride Fare because it has not been enabled yet; however, similar logic applies: its introduction is not accompanied by elimination or increase of any fare types. It also does not confer any new favorable pricing for anyone who would not already be qualified for such a discount.

Altogether, this analysis finds that the On-Board Light Rail Single Ride Fare, as currently priced, and the On-Board Light Rail Discount Single Ride Fare, if priced the same as SacRT's discount fare (currently \$1.25), would result in *no disparate impacts on minority populations* and *no disproportionate burdens on low-income populations*.

8. Justification, Alternatives, and Mitigation

Facially, creation of the Elk Grove fare types would not appear to be discriminatory, because all pricing was kept unchanged in the transition of transit services from the City of Elk Grove to SacRT. The purpose of the quantitative Title VI analysis is to help avoid unintentional discrimination. In this case, the analysis yields a potentially unexpected result: although Elk Grove fares are *lower priced* than comparable SacRT fares, Elk Grove riders typically *pay more* out of pocket, apparently due to lower use of discount fare types. Because Elk Grove riders are disproportionately minority, the quantitative analysis suggests that there may be a *potential* disparate impact. This does 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 minority riders, where practicable.

<u>Alternatives</u> – SacRT's negotiated annexation of City of Elk Grove transit services mandated that SacRT maintain the pre-existing fare structure for Elk Grove transit services until at least December 31, 2021, which is also the end of the six-month period where a fare change may be considered temporary and exempt from Title VI. This analysis is therefore concerned only with whether it would be discriminatory to continue the Elk Grove fares as-is beyond that date. The Elk Grove fares consist of several different fare types (e.g., single ride, daily pass, monthly pass) so countless alternatives are theoretically possible (although demographic data is not currently available for each specific type, limiting SacRT's ability to compare Title VI impacts).

The simplest alternative would be to rescind the creation of all Elk Grove fares. Such a "no project" scenario would actually be *more* adverse to minority populations: If the Elk Grove fares did not exist, then Elk Grove riders who are not eligible for a discount would have to pay the ordinary SacRT fare of \$2.50 for a single ride or \$100 for a monthly pass. Since this is more than the \$2.25 single fare or \$80 Local monthly pass under the Elk Grove fare structure, this would *increase* any impact on minority populations. The "no project" alternative would therefore be *worse* from a Title VI standpoint than the proposed action, i.e., the creation/maintenance of special Elk Grove fares.

It is important to observe that the quantitative approach to this Title VI analysis is useful for detecting unintentional biases, but it may not comprehensively and definitively determine whether a proposed action is discriminatory because it looks at the issue from only one of several possible and reasonable standpoints. The formal quantitative analysis has been prepared from the standpoint of how *SacRT's* average fare splits would change and has found that SacRT's average fare would increase more for minority than non-minority populations. However, from the standpoint of *purchasing customers*, the proposed action would not seem discriminatory, because it would have *no effect*. Pricing has been left entirely unchanged from what it was under the City of Elk Grove. No customer has or would experience a change in pricing from continuing Elk Grove fares as they are. The average fare paid by the *affected customers* would not change from the "before" to the "after" condition, because pricing is unchanged.

<u>Justification</u> – As discussed above, Elk Grove fares are *lower priced* than SacRT fares, but the average fare paid is *higher* due apparently to *less use of discount fare types*. This in turn is likely due to Elk Grove ridership being over half from commuter bus routes, which typically skew toward non-discount fare types (i.e., commuter routes typically have fewer student, senior, and

disabled riders). Commuter bus routes, such as the Elk Grove commuter buses to Downtown Sacramento, are also typically considered higher-value or premium service, due to longer average trip length and replacement of a higher-cost automobile trip. This implies that Elk Grove riders, who are above-average minority, do indeed tend to pay an above-average fare, but it is to some extent justifiable, because a great proportion of them are paying that fare to ride higher-value commuter bus service.

It should also be kept in mind that Elk Grove transit fares are already *lower* than SacRT fares at only \$2.25 for a single ride (compared to \$2.50 for SacRT) with similarly lower pricing for comparable multi-ride passes. Elk Grove riders also have the option of a \$80 local-only monthly pass. While Elk Grove riders may in fact be paying more on average, it is not for lack of fair pricing. Essentially, every full-priced fare option is priced equal to or lower than its SacRT equivalent. Elk Grove riders just happen to be more likely to pay the full fare, rather than the discount fare (i.e., because overall, they have a lower percentage of senior, disabled, and student riders). Notably, this is not because of more restrictive eligibility rules. Eligibility rules for discount fare types are the same or more inclusive for Elk Grove fares (e.g., for both SacRT and Elk Grove service, the age for senior eligibility is age 62, disability certification follows the same rules, and TK-12 students ride for free).

Lastly, as discussed above, from the perspective of Elk Grove customers, the fare is *not changing*.

Overall, even though Elk Grove riders are paying a slightly higher average fare than SacRT riders and even though they tend to be more minority, the suggestion that this is discriminatory would appear to rest mostly on evidence that is somewhat or largely inapplicable. When alternatives and seemingly more applicable analytical standpoints are taken into consideration, the proposed action appears to have a substantial, legitimate justification.

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RESOLUTION NO. 2022-05-045

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

May 9, 2022

APPROVING A TITLE VI SERVICE EQUITY ANALYSIS AND ADOPTING SERVICE CHANGES FOR SEPTEMBER 2022 AND FUTURE SERVICE

WHEREAS, SacRT is considering major service changes, as defined in Resolution 15-12-0137, planned for implementation on or around September 2022, as described and except as noted in Exhibit A; and,

WHEREAS, a draft service plan, including a Title VI service equity analysis of the proposed changes has been prepared, made available for a 30-day public review and comment period, publicized in accordance with SacRT policy on major service changes; and,

WHEREAS, the Title VI service equity analysis found that there might be potential disproportionate burdens to low-income populations from adopting the proposed service changes because the proposed new service is expected to be disproportionately used by non-low-income populations;

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

THAT, the Board of Directors has reviewed and approved the Title VI service equity analysis set forth in Exhibit A and has reviewed and taken into consideration all public comments related to the proposed changes and the Title VI service equity analysis; and.

THAT, the potential disproportionate burden to low-income populations is the result of improving or introducing service that would be fully paid for by others and that without these changes, the remainder of the proposed service changes would not result in a potential disproportionate burden to low-income populations; and,

THAT, recognizing this determination, the Board of Directors finds that there is a substantial legitimate justification to implement the service changes as proposed;

THAT, the changes to Route 177 made on August 30, 2021 are hereby approved to become permanent, pending written approval by City of Rancho Cordova, as described in Exhibit A; and,

THAT, the proposed changes to Route 138 are hereby approved, and the General Manager/CEO is hereby authorized to implement such changes on or around September 2022, pending approval by the Yolo County Transportation District, as described in Exhibit A; and,

THAT, the proposed changes to Route E110 are hereby approved, and the General Manager/CEO is hereby authorized to implement such changes on or around September 2022, pending execution of a cost-sharing agreement with Sky River Casino to fully fund the direct operating cost of the additional service, as described in Exhibit A; and,

THAT, the proposed new route, tentatively referred to as Route E37, is hereby approved and the General Manager/CEO is hereby authorized to implement the new route, with a start date depending on vehicle acquisition, pending execution of a cost-sharing agreement with UC Davis Health, to fully fund the direct operating cost and any capital cost of the new service, as described in Exhibit A; and,

THAT, the remainder of the proposed service changes set forth in Exhibit A are hereby approved, and the General Manager/CEO is hereby authorized to implement such changes effective on or around September 2022, as described in Exhibit A.

DocuSigned by:

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STEVE MILLER, Chair

ATTEST:

HENRY LI, Secretary

Docusigned by:

Tabella Smith

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Tabetha Smith, Assistant Secretary

Sacramento **Regional Transit**

September 2022 Service Changes Final Plan and Title VI Equity Analysis

Presented to the SacRT Board of Directors
May 9, 2022

Overview

SacRT's major service change policy requires a 30-day public review and Title VI service equity analysis before approving any major service changes. The following report presents proposed changes broadly categorized as follows:

Service Restorations – Restoring bus service that was designated for temporary suspension beginning on April 3, 2022 (see below for extended discussion on temporary suspensions)

Permanent Elimination – Making permanent a small subset of originally temporary suspensions of certain routes and trips beginning on April 3, 2022

SRTP Implementation – Implementing changes to service as set forth in SacRT's Short Range Transit Plan, or other minor changes requested by customers or recommended by staff

Contract Service – Analyzing changes approved earlier on a temporary basis (i.e., improvements to the Rancho CordoVan) or being considered for the future (i.e., a new commuter route from Elk Grove to UC Davis Health and additional weekend service to the future Sky River Casino)

Temporary Suspensions

In March 2022, SacRT announced temporary suspensions of all or part of several bus routes throughout the system, to address a shortage in bus operators which has been resulting in systemwide reliability problems. By suspending approximately 3 percent of bus service, SacRT sought to better allow customers to plan around system outages, rather than be subject to random and unplanned outages.

Factors - Suspensions were spread throughout the system, to avoid targeting a single area or type of service. For example, several commuter bus routes, trunk line service on Florin Road, and Route 142 service to Sacramento International Airport were all included as suspensions.

Example 1:

In the case of Florin Road service, the route in question is a high-ridership route (i.e., Route 81) however, it was felt that lengthening frequency from 15 to 30 minutes would be less impactful than lengthening headways from 30 to 60 minutes on a lower frequency route (or eliminating a low-frequency route altogether).

Example 2:

Frequency on Route 142 to the airport was reduced from 30 to 60 minutes, which is understandably less convenient; however, staff felt that by conserving some resources on airport service, less lifeline service would have to be suspended.

Example 3:

Suspensions to commuter bus service were made with reluctance, given that the COVID-19 pandemic appeared to be subsiding and many office workers were returning to work; however, compared to student riders and transit-dependent riders, commuter ridership has had the most extreme ridership loss and has been the last and slowest ridership type to rebound. Teleworking seems likely to permanently reduce commuter ridership going forward, so it was felt that reductions to commuter bus service should be suspended as well, especially where an alternative route might be available, even if the alternative route might have a longer route or more stops.

Public Review - The April suspensions were approved on relatively short notice, without a 30-day public review, on the basis that they were considered temporary, lasting no more than twelve months, and as such did not constitute major service changes under SacRT policy. This was justified on the basis that expeditiousness was required to address a problem that was both immediate and temporary. This report analyzes those suspensions; however, the plan itself calls for most (although not all) of them to be reversed in September.

Equity - As discussed in the Title VI section of this report, if Route 142 and several commuter bus routes had not been included among the suspensions, the impacts of the suspensions would have fallen disproportionately on disadvantaged populations.

Permanent Eliminations

Certain trips on Routes 23, 82, and 86 that were suspended in April 2022 were designated for permanent elimination in this plan. In general, the selected trips are trips that were previously added to the schedule to augment capacity but that are not considered necessary under current circumstances, with ridership having decreased from the COVID-19 pandemic. Supplemental trips such as these often consume an outsize share of resources (e.g., an additional bus may have to pull out each day just to operate a single peak-hour trip). Trips like these should therefore only be operated when they are genuinely needed for capacity reasons. If ridership returns to prior levels, these trips could be restored.

SRTP Implementation

Throughout 2021 and over the past few months, SacRT has been updating its Short Range Transit Plan. The public comment period for the Draft SRTP recently closed and the final version is being presented to the SacRT Board in a separate agenda item but on the same agenda as this service change plan. The SRTP provides a higher-level look at potential service improvements over the next five years and a forum for stakeholders to evaluate options, costs, and priorities. Staff evaluated potential improvements from the Draft SRTP and recommended a subset of them for implementation in September 2022. Due to SacRT's ongoing shortage of bus operators, Staff has kept the magnitude of changes relatively modest. Staff has also prioritized improvements to evening span of service (rather than additional daytime trips) to avoid incrementing the peak vehicle requirement, until more of SacRT's bus fleet is replaced with newer vehicles.

Contract Service

Four routes in this service plan are already operated or would potentially be operated with support from an outside party under a cost-sharing agreement, covering SacRT's operating costs.

Title VI and Approval

SacRT policy requires a Title VI service equity analysis prior to adopting major service changes. That analysis can be found in Section II. Staff anticipates presenting a final plan, a final Title VI analysis, and all public comments to the SacRT Board on May 9, 2022 for potential approval.

Section I

Service Plan

#1 Greenback

Description – Add one evening trip on Saturday leaving Watt/I-80 light rail station at 9:36 pm..

Discussion – Addition of this trip would close a 60-minute gap in service and was identified in SacRT's Draft Short Range Transit Plan as a priority to promote interconnectivity and reduce travel times across the network. Route 1 is a major route with connections to the Blue Line and Routes 21, 23, 25, 26, 82, 84, and 93.

Evening service improvements are also being prioritized at this time (e.g., over peak-hour improvements) to avoid incrementing SacRT's daily vehicle requirement.

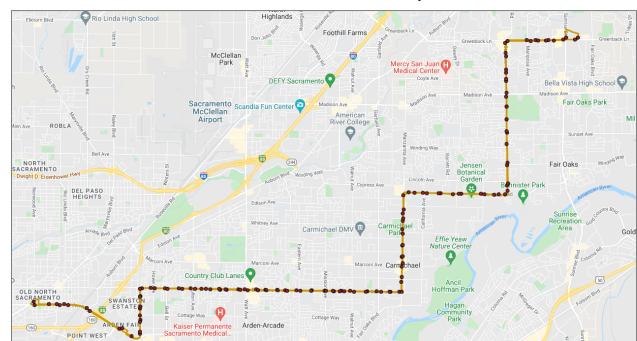
Fiscal Impact - Operating cost for the new trip is estimated at **\$5,103** per year, before fare revenue.

#23 El Camino

Description - Make permanent the suspension of eight short trips suspended in April 2022 due to low ridership and to conserve resources.

Background – These eight trips were added in September 2019 as part of the SacRT Forward project. The purpose, at the time, was to begin upgrading Route 23 to 15-minute frequency during the times of highest ridership. They do not operate the entire length of the route, but instead, run only from Arden/Del Paso light rail station to Watt Avenue, which is the busiest segment of the route. These eight trips were designated for suspension in April 2022. This change would make that suspension permanent. If/when ridership on the route returns to pre-pandemic levels, these trips could and should then be restored.

Fiscal Impact - Operating savings for this improvement are estimated at \$124,959 per year, excluding fare revenue.



#23 El Camino Map

Route 23 runs from Arden/Del Paso light rail station to Sunrise Mall, primarily via El Camino Ave., Fair Oaks Blvd., San Juan Ave, and Greenback Lane.

#26 Fulton

Description – Add three evening trips on weekdays including trips from University/65th Street light rail station at 8:47 and 9:47 pm and from Watt Ave and Elverta Road at 8:53 pm.

Discussion – Addition of these trips would close several 60-minute gaps in service and was identified in SacRT's Draft Short Range Transit Plan as a priority to promote interconnectivity and reduce travel times across the network. Route 26 is a major route with connections to the Blue Line, Gold Line, and Routes 1, 13, 19, 23, 25, 38, 81, 82, 84, and 87.

Evening service improvements are also being prioritized at this time (e.g., over peak-hour improvements) to avoid incrementing SacRT's daily vehicle requirement.

Fiscal Impact - Operating cost for the new trips is estimated at **\$82,265** per year, before fare revenue.

#23 El Camino Monday to Friday Schedule Suspended Trips for Permanent Elimination

Sunrise Mall	Watt Ave	Arden Del Paso	Arden Del Paso	Watt Ave	Sunrise Mall
5:15a	5:45a	6:08a	6:23a	6:44a	7:20a
5:45a	6:15a	6:38a	6:53a	7:17a	7:57a
6:15a	6:45a	7:08a	7:23a	7:47a	8:27a
6:43a	7:15a	7:38a	7:53a	8:15a	8:52a
7:08a	7:44a	8:08a	8:23a	8:45a	9:22a
7:38a	8:14a	8:38a	8:53a	9:15a	9:52a
8:08a	8:44a	9:08a	9:23a	9:45a	10:22a
8:38a	9:14a	9:38a	9:53a	10:15a	10:52a
9:08a	9:44a	10:08a	10:23a	10:46a	11:25a
9:38a	10:14a	10:38a	10:53a	11:16a	11:55a
10:08a	10:44a	11:08a	11:23a	11:46a	12:25p
10:35a	11:13a	11:38a	11:53a	12:18p	12:58p
11:05a	11:43a	12:08p	12:23p	12:48p	1:28p
11:35a	12:13p	12:38p	12:53p	1:18p	1:58p
12:05p	12:43p	1:08p	1:23p	1:48p	2:28p
12:35p	1:13p	1:38p	1:53p	2:20p	3:00p
1:04p	1:42p	2:08p	2:23p	2:50p	3:30p
1:34p	2:12p	2:38p	2:53p	3:20p	4:00p
2:03p	2:41p	3:07p	3:23p	3:50p	4:30p
2:30p	3:08p	3:34p	3:38p	4:05p	
	3:25p	3:51p	3:53p	4:20p	5:00p
3:01p	3:42p	4:08p	4:08p	4:35p	_
3:18p	3:57p	4:23p	4:23p	4:50p	5:30p
	4:11p	4:34p	4:39p	5:06p	
3:48p	4:27p	4:53p	4:53p	5:20p	6:00p
	4:41p	5:04p	5:08p	5:35p	
4:18p	4:57p	5:23p	5:23p	5:50p	6:30p
	5:11p	5:34p	5:39p	6:06p	
4:48p	5:27p	5:53p	5:53p	6:16p	6:52p
5:08p	5:43p	6:08p	6:23p	6:46p	7:22p
5:41p	6:16p	6:41p	6:53p	7:14p	7:48p

	6:11p	6:44p	7:07p	7:23p	7:44p	8:18p	
	6:41p	7:14p	7:37p	7:53p	8:14p	8:48p	
_	7:15p	7:46p	8:07p	8:23p	8:42p	9:12p	
	7:45p	8:16p	8:37p	8:53p	9:12p	9:42p	
	8:15p	8:46p	9:07p	9:23p	9:42p	10:12p	
	8:45p	9:16p	9:37p	9:53p	10:12p	10:42p	
	9:15p	9:46p	10:07p	10:23p	10:42p	11:12p	

The trips shown in red would be permanently eliminated Includes westbound trips from Watt Avenue at 4:11, 4:41, and 5:11 pm

Includes eastbound trips from Arden/Del Paso at 3:38, 4:08, 4:39, 5:08, and 5:39 pm Remaining trip times may be shifted to maintain even 30-minute frequency on remainder of the route

#30 J Street

Description – Add a morning trip beginning at CSUS around 5:31 am and arriving at Sacramento Valley Station around 5:54 am (to connect with the 6:10 am Capitol Corridor train and allow earlier travel to Sacramento International Airport). Add evening trips from CSUS at 6:57 and 7:57 pm and from Sacramento Valley Station at 7:39 and 8:39 pm to improve evening headways from 60 to 30 minutes (and to also provide better connections from Capitol Corridor trains arriving at 8:09 and 9:15 pm).

Background – In 2019, as part of the SacRT Forward project, frequency on Route 30 was reduced during the midday period from 15 to 30 minutes. At the same time, Route 38 was realigned from P/Q Streets to J/L Streets, sharing the corridor with Route 30, and providing a combined 15-minute frequency. Route 30 retained its own independent 15-minute frequency during busier peak hours. Reduction of frequency on Route 30 has been one of the less popular changes from SacRT Forward, with many operators and customers complaining that the simplicity of 15-minute frequency on Route 30 was essential to its usefulness. As a shorter-distance route, 30-minute frequency can struggle to compete against other short-distance modes such as ride-share.

SacRT's Short Range Transit Plan identified restoration of 15-minute daytime frequency on Route 30 as a high priority; however, at \$918,820 per year, it is a very expensive improvement. SacRT has also been experiencing vehicle shortages with the aging of its fleet. Although replacement vehicles will be arriving over the next year, for these reasons combined staff recommends at this time prioritizing just some of the evening service on Route 30, where existing frequency is 60 minutes, plus one morning trip. These changes are lower in cost and do not require additional vehicles. Improving to 15-minute frequency all-day would require an estimated two new vehicles each day.

Equity – Route 30 skews very low for low-income ridership, so major improvements to Route 30, without improvements to lower-income routes elsewhere (or reductions to other higher-income routes) might also contribute significantly to the service changes being unintentionally discriminatory, as discussed in more detail in the Title VI equity analysis section. For this reason, a smaller change to Route 30 is recommended at this time, rather than the entire 15-minute frequency improvement.

Fiscal Impact – Operating cost for the five new trips recommended is estimated at \$109,340 per year, before fare revenue.

#30 J Street
Proposed Schedule
Monday to Friday

CSUS	L & 29th	Sac Valley	Sac Valley	J & 28th	CSUS
5:31a	5:42a	5:54a	6:09a	6:24a	6:35a
5:56a	6:07a	6:19a	6:39a	6:55a	7:07a
6:26a	6:37a	6:49a	7:09a	7:25a	7:37a
6:56a	7:07a	7:19a	7:25a	7:41a	7:53a
7:26a	7:38a	7:52a	7:39a	7:55a	8:07a
7:56a	8:08a	8:22a	7:55a	8:11a	8:23a
8:26a	8:38a	8:52a	8:09a	8:25a	8:37a
8:56a	9:08a	9:22a	8:25a	8:41a	8:53a
9:26a	9:38a	9:52a	8:39a	8:55a	9:08a
9:56a	10:08a	10:22a	9:09a	9:25a	9:38a
10:26a	10:38a	10:52a	9:39a	9:55a	10:08a
10:56a	11:09a	11:25a	10:09a	10:25a	10:38a
11:25a	11:38a	11:54a	10:39a	10:56a	11:10a
11:55a	12:08p	12:24p	11:09a	11:26a	11:40a
12:25p	12:38p	12:54p	11:39a	11:56a	12:10p
12:55p	1:08p	1:24p	12:09p	12:26p	12:40p
1:25p	1:38p	1:54p	12:39p	12:56p	1:10p
1:55p	2:08p	2:24p	1:09p	1:26p	1:40p
2:25p	2:38p	2:54p	1:39p	1:56p	2:10p
2:40p	2:53p	3:09p	2:09p	2:26p	2:40p
2:55p	3:08p	3:24p	2:39p	2:56p	3:10p
3:10p	3:23p	3:39p	3:09p	3:27p	3:41p
3:25p	3:38p	3:54p	3:39p	3:57p	4:11p
3:40p	3:53p	4:09p	4:09p	4:27p	4:41p
3:55p	4:08p	4:24p	4:25p	4:43p	4:57p
4:10p	4:23p	4:39p	4:39p	4:57p	5:11p
4:25p	4:38p	4:54p	4:55p	5:12p	5:27p
4:40p	4:53p	5:09p	5:09p	5:26p	5:41p
4:56p	5:09p	5:22p	5:25p	5:41p	5:53p

	5:26p	5:37p	5:52p	5:39p	5:55p	6:07p
•	5:56p	6:07p	6:22p	6:09p	6:25p	6:37p
	6:26p	6:37p	6:52p	6:39p	6:53p	7:03p
	6:57p	7:06p	7:18p	7:09p	7:23p	7:33p
	7:27p	7:36p	7:48p	7:39p	7:53p	8:03p
	7:57p	8:06p	8:18p	8:09p	8:23p	8:33p
	8:27p	8:36p	8:48p	8:39p	8:53p	9:03p
	9:27p	9:36p	9:48p	9:09p	9:23p	9:33p

New trips (shown in blue) from CSUS at 5:31 am, 6:57 pm, and 7:57 pm

New trips (shown in blue) from Sacramento Valley Station at 7:39 pm and 8:39 pm

Draft schedule subject to change

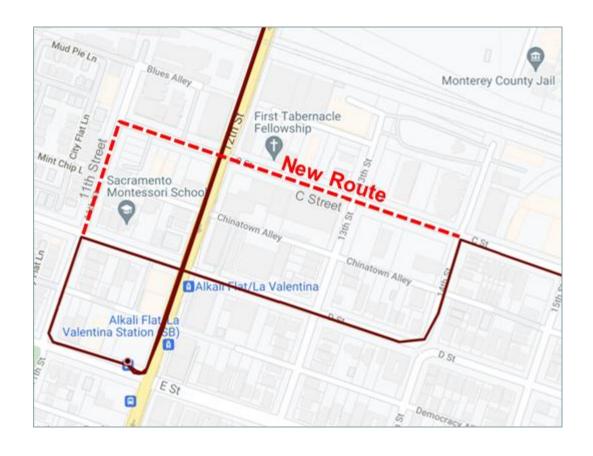
#33 Dos Rios

Description – Realign the route from D Street to C Street, via 11th Street.

Background – This routing reduces two turns from the existing route and moves Route 33 from a residential street (i.e., D Street) to a more commercial corridor (i.e., C Street) partly in response to noise complaints from residents of C Street. This does not affect any bus stops and should have no effect on ridership.

Fiscal Impact – None. This is a cost-neutral change.

#33 Dos Rios Changes to Route Map



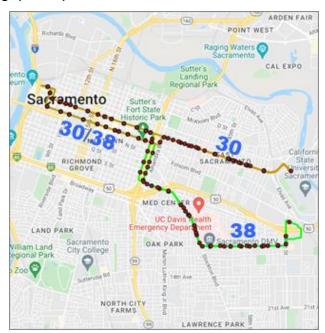
#38 Tahoe Park

Description - Adjust departure times from Sacramento Valley Station to improve spacing with Route 30 and improve transfers to Route 68.

Background – During the midday period, Route 30 and 38 both have 30-minute frequency and are scheduled 15 minutes apart on the shared J/L Street corridor. However, during peak hours, when Route 30 has 15-minute frequency, Route 38 trips are scheduled at the same time, or just a minute or two apart. This proposal would shift Route 38 times ahead by a few minutes, during times when its schedule is to close to that of Route 30.

Objectives – This change will reduce incidents of Route 30 and 38 buses arriving at J Street stops at the same time and queuing into the street. It will also reduce incidents of Route 38 arriving at the same time as Route 68 on 29th Street, where the two routes coincidentally have similar arrival times. By shifting Route 38 earlier, it may take pressure off Route 30, which tends to have more riders, and add riders to Route 38, which tends to have fewer riders. It will also tend to provide more schedule cushion for riders making the transfer from Route 38 outbound from downtown to Route 68, which continues to Oak Park, South Sacramento, and ultimately Cosumnes River College.

Schedule Constraints – Due to connections with light rail at Sacramento Valley Station, 29th Street, and University/65th Street, the Route 38 schedule should not be shifted excessively. Likewise, a major shift in the Route 38 schedule during peak hours (when Route 30 has 15-minute frequency) would create an irregular gap in trips at the time of the transition to midday hours.



#51 Stockton/Broadway

Description – Add four evening trips on Saturdays including trips from downtown Sacramento at 7:38, 8:38, and 9:38 pm and from Florin Towne Centre at 8:44 pm.

Add six evening trips on Sundays and Holidays and shift trip start times so that buses leave downtown Sacramento at approximately 7:12, 7:42, 8:12, 8:42, 9:12, and 9:42 pm and so that buses leave Florin Towne Centre at approximately 6:54, 7:24, 7:54, 8:24, and 8:54 pm.

Discussion – Addition of these trips would close several gaps in service of 45 to 60 minutes and lengthen the service day so the last bus from downtown would change from an 8:30 pm departure to a 9:42 pm departure. These changes were identified in SacRT's Draft Short Range Transit Plan as a priority to promote interconnectivity and reduce travel times across the network. Route 51 is a major route with connections to the Routes 38, 61, 67, 68, and 81, as well as numerous bus routes and light rail in downtown Sacramento.

Evening service improvements are also being prioritized at this time (e.g., over peak-hour improvements) to avoid incrementing SacRT's daily vehicle requirement.

Fiscal Impact - Operating cost for the new trips is estimated at \$66,538 per year, before fare revenue.

#81 Florin

Description - Restore all trips that were temporarily suspended in April 2022, restoring frequency to 15 minutes throughout the day on weekdays.

Add two evening trips on Saturdays beginning at University/65th Street light rail station at 9:13 pm and at Florin Road and Riverside Blvd at 9:18 pm.

Add six evening trips on Sundays and Holidays beginning at University/65th Street at 7:43, 8:43, and 9:13 pm and from Florin Road and Riverside Blvd at 6:48, 7:48, and 8:48 pm.

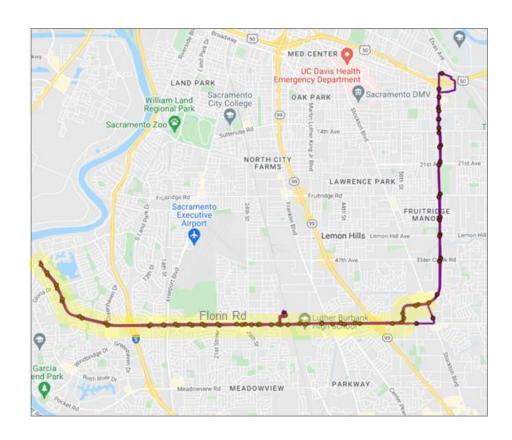
Background – Route 81 weekday service runs every 15 minutes on Florin Road during the day and every 30 minutes on 65th Street and through the evening on the entire route. In response to a major shortage in bus operators, service on Florin Road was reduced to every 30 minutes in April 2022, from approximately 5:34 am to 2:31 pm. This change would reverse that temporary measure.

Weekend trips would then be added to close several gaps in service of 60 minutes and lengthen the Sunday/Holiday service day by one hour. These changes were identified in SacRT's Draft Short Range Transit Plan as a priority to promote interconnectivity and reduce travel times across the network. Route 81 is a major route with connections to the Blue Line and Gold Line and Routes 26, 38, 51, 61, 62, 67, 68, 82, and 87.

Equity – Route 81 serves disproportionately high minority and low-income populations, so if the April 2022 suspensions were made permanent (i.e., not reversed) it could contribute to the overall package of changes having a disparate impact on disadvantaged populations.

Fiscal Impact – There is no budget impact from reversing temporary suspension of service since the original suspension was itself not treated as a budget reduction. Operating cost for the new trips is estimated at \$59,958 per year, before fare revenue.

#81 Florin Route Map With Florin Road Segment Highlighted



#82 Northrop/Morse

Description - Make permanent the April 2022 suspension of one morning trip beginning at 7:32 am due to low ridership and to conserve resources.

Background – The 7:02 and 7:32 am trips were added several years ago to augment the ordinary 30-minute headway schedule during busy peak hours. Neither trip is well-used, but the 7:02 am trip backs up a heavily used 6:43 am trip. The 7:32 am trip has fairly low ridership, and its elimination would free an entire bus for redeployment elsewhere.

Fiscal Impact - Operating savings for this improvement are estimated at \$32,281 per year, excluding fare revenue. Because of how this trip is scheduled, as a special trip, augmenting the baseline 30-minute headways on the route, elimination of this single trip would free an entire morning bus.

#82 Northrop/Morse Average Daily Ridership on Outbound Morning Trips

Departure	Ridership
6:13a	7
6:43a	34
7:02a	12
7:16a	10
7:32a	8
7:43a	14
8:13a	13
8:43a	11
9:13a	10
9:43a	11
6:13p	8
6:43p	6

The 7:32 am trip would be eliminated.

#86 Grand

Description - Make permanent the April 2022 suspension of two morning trips beginning at 6:47 and 7:17 am due to low ridership and to conserve resources.

Background - These trips were added several years ago to augment the normal 30-minute frequency into downtown on Route 86, due to full buses at that time. Since the COVID-19 pandemic, commuter hour ridership has been slow to recover. If/when ridership rebounds on the normal 30-minute headway trips, these trips could and should be restored.

Fiscal Impact - Operating savings for this improvement are estimated at \$66,645 per year, excluding fare revenue.

#86 Grand
Average Daily Ridership
on Inbound Morning Trips

Departure	Ridership			
5:32a	5			
6:02a	7			
6:32a	11			
6:47a	7			
7:02a	8			
7:17a	8			
7:32a	8			
8:02a	10			
8:32a	9			

The 6:47 and 7:17 am trips would be eliminated.

#93 Hillsdale

Description - Add one morning trip beginning at 7:04 am and arriving Watt/I-80 light rail at 7:37 am to close a 60-minute gap in inbound morning trips.

Discussion – The new trip would connects with a Blue Line train departing at 7:48 am and arriving downtown at 8:16 am (at 7th & Capitol). This would fill an irregular gap of approximately 60 minutes during the morning peak (the rest of the route has 30-minute headways during the day).

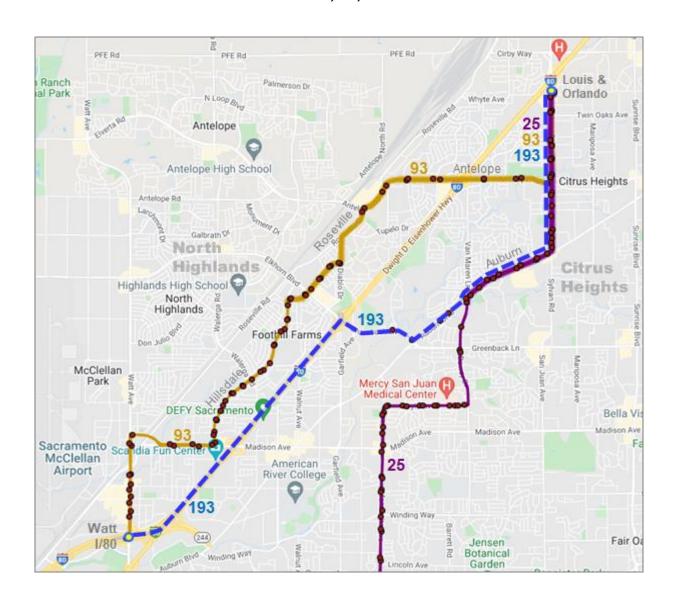
Background – Before 2019, Route 93 operated in a shared corridor with Route 193 on Auburn Blvd., in Citrus Heights. The SacRT Forward new bus network realigned Route 93 from Auburn Blvd. to the west side of Interstate 80, to provide new coverage to previously unserved parts of North Highlands. The former Route 93 service on Auburn Blvd. was covered by Route 25, which was itself realigned. Route 93 may have been missing a peak-hour trip from the pre-SacRT Forward days, when riders destined for Watt/I-80 station would have had peak-hour options on Route 193. The absence of a 7:04 am inbound trip on Route 93 post-SacRT Forward may have been an oversight.

#93 Hillsdale
Average Daily Ridership
on Inbound Morning Trips

Departure	Ridership		
5:43a	8		
6:38a	12		
7:04a	new trip		
7:32a	7		
8:04a	6		
8:34a	6		
9:04a	5		
9:34a	6		

A 7:04 am trip would be created, filling an approximate 60-minute gap in service

Routes 25, 93, and 193



#107 Land Park Express

Description - Restore all trips that were temporarily suspended in April 2022.

Background - Route 107 provides peak-hour commuter service from the South Land Park area to Downtown Sacramento consisting of three morning and three evening trips. In response to a major shortage in bus operators, this service was entirely suspended in April 2022. This proposal would reverse that suspension.

The COVID-19 pandemic reduced ridership on SacRT commuter bus routes by an average of 90 percent, compared to 70 percent for the overall system. Route 107 was selected as a route for April suspension due partly to low ridership and partly due to availability of reasonable alternatives, such as Routes 62 or 106. Route 107 notably picks up only in South Land Park and Pocket/Greenhaven, getting on Interstate 5 at 43rd Avenue.

Before the pandemic, there was enough demand for commuter service to downtown to justify a bus picking up only in these specific areas. In other words, a bus could be filled from these areas alone, so it was justifiable to run Route 107 non-stop from there to downtown, without any stops north of 43rd Avenue. Post-pandemic, with commuter ridership struggling, it was felt that Routes 102 and 106 made more sense to retain than Route 107. Although Routes 102 and 106 also run only during peak hours (i.e., commuter service) they use local streets all the way to downtown, serving approximately 60 percent more potential riders than their freeway express counterparts. Staff felt that if some service had to be suspended that coverage should be prioritized. With the pandemic hopefully subsiding and operator availability hopefully returning to normal, Staff believes these trips should be restored in September 2022, to provide attractive options to a re-emerging commuter market.

Equity – Route 107 and most of SacRT's commuter routes have very low rates of low-income ridership. For this reason, these routes should not be disproportionately excluded from systemwide reductions and should not be excessively prioritized for restoration or improvement.

Fiscal Impact – There is no budget impact from reversing temporary suspension of service since the original suspension was itself not treated as a budget reduction.

#134 McKinley Commuter

Description - Restore all trips temporarily suspended in April 2022. Also, realign the route to 53rd Street (Sutter Village) from Pala Way, Coloma Way, and part of F Street and realign the route to McKinley Blvd., Elvas Ave., and 45th Street from Meister Way, Aiken Way, and Brand Way.

Background - Route 134 provides peak-hour commuter service from the East Sacramento to downtown. In response to a major shortage in bus operators, this service was entirely suspended in April 2022, except for two trips heavily used by students, many coming from River Park, who would have no feasible alternative route. This proposal would reverse that suspension.

The COVID-19 pandemic reduced ridership on SacRT commuter bus routes by an average of 90 percent, compared to 70 percent for the overall system. Route 134 was selected as a route for April suspension due partly to low ridership and partly due to availability of reasonable alternatives, such as Route 30.

Timing – The route changes to Elvas Avenue, from Meister Way, is contingent on and will not take effect until construction of a new bus stop on eastbound McKinley Boulevard near Meister Way (across from Compton's Market) which itself depends on securing space on private property to build an ADA-compliant bus stop pad.

Equity – Route 134 and most of SacRT's commuter routes have very low rates of low-income ridership. For this reason, these routes should not be disproportionately excluded from systemwide reductions and should not be excessively prioritized for restoration or improvement.

Fiscal Impact – There is no budget impact from reversing temporary suspension of service since the original suspension was itself not treated as a budget reduction.

#134 McKinley Commuter



Route 134 would be realigned in East Sacramento to have fewer turns and operate on fewer narrow streets

#138 Causeway Connection

Description – Add one morning round trip and one afternoon round trip. One of the round trips would be operated by SacRT. The other round trip would be operated by Yolobus. Other adjustments may be made to running times, to account for increased traffic on Interstate 80 between Sacramento and Davis.

Background – The Causeway Connection is jointly operated by SacRT and Yolobus according to an agreement that also includes the provision of operating subsidy from the University of California, Davis. The service is also supported by a Congestion Mitigation and Air Quality (CMAQ) grant, which provides an approximate 1-to-1 match with the UC Davis contribution to fully fund operations and maintenance. Although an amendment is not needed to alter service levels, these changes would be contingent upon written concurrence from both Yolobus and UC Davis, which is anticipated.

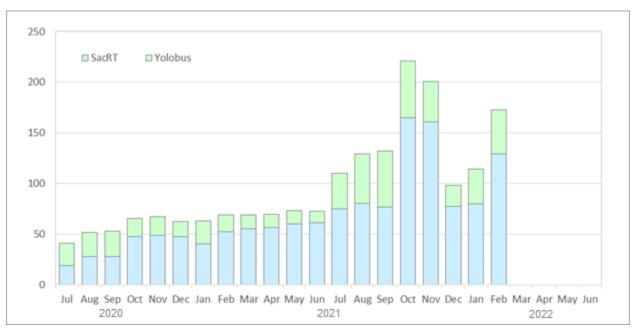
Justification - The three-party agreement for the Causeway Connection funded and obligated SacRT and Yolobus to operated 22 round trips per weekday. Due to the COVID-19 pandemic, the parties agreed to reduce service levels. The route was introduced with just peak-hour service, which was later increased to the current basic hourly all-day service levels with a total of 15 round trips. This proposal would increase service levels to 17 round trips of the originally planned 22 round trips.

Ridership – Ridership on the Causeway Connection began growing significantly in Fall 2021. Prior to that, ridership was primarily from commuters to Sacramento. With on-campus activities returning to normal in Davis, ridership to Davis has grown. Total ridership in February 2022 averaged 175 boardings per day.

Productivity - Because it is relatively long route without seat turnover, productivity is still less than 6 boardings per revenue hour, which is very low compared to other SacRT fixed-route service; however, operating subsidy from UC Davis and the CMAQ grant make productivity less important. Although the lack of seat turnover prevents boardings from hour from being very high, capacity utilization is relatively strong, with many trips approaching or exceeding 20 passengers.

Bicycle Capacity – One of the most common complaints on the Causeway Connection has been lack of bicycle capacity. Bicycle capacity on the electric bus fleet, which was paid for by Electrify America as part of the Volkswagen emissions scandal settlement, is limited to a standard front-mounted triple bike rack. SacRT and Yolobus have explored other options for increasing bicycle capacity per bus, but do not believe there are any feasible options. Adding peak-hour trips is one of the only ways to increase bicycle capacity per hour and reduce pass-ups due to full bike racks.

#138 Causeway Connection Average Daily Boardings by Month



Stakeholder Workshop – Under the three-party agreement for the Causeway Connection, the parties must periodically host workshops with the riders to discuss the service. The next of these workshops was held on April 27, and provided an opportunity to share ridership data and take input from customers on the ideal times for new trips to be added.

Equity – The Causeway Connection is 45 percent below average for minority ridership and 17 percent below average for low-income ridership; however, operating and maintenance costs are fully subsidized, so new service on the Causeway Connection would not actually deprive disadvantaged groups of benefits they might otherwise receive.

Fiscal Impact – There is no fiscal impact to this change because additional costs will be paid for by UC Davis and by increased claims of supporting CMAQ funds. It would require an additional peak vehicle in operation; however, the Causeway Connection has its own branded fleet, which is sufficient to meet this need.

Contingency – For this route, the SacRT Board is being asked merely to authorize the change. Yolobus and UC Davis must both agree before the change could be made.

#138 Causeway Connection Average Daily Boardings by Trip Eastbound to Sacramento

Begin	Sep 21	Oct 21	Nov 21	Dec 21	Jan 22	Feb 22
6:07a	4	1	1	0	2	1
7:07a	12	15	16	11	9	11
8:07a	5	0	1	0	1	2
9:10a	5	10	10	6	7	8
10:10a	3	4	5	2	6	10
11:10a	6	0	0	0	3	2
12:10p	3	8	8	2	3	8
1:10p	4	10	4	2	2	3
2:10p	4	11	9	3	3	7
3:10p	4	7	4	3	3	4
4:10p	5	19	16	7	6	13
5:10p	3	6	4	2	3	5
6:10p	4	12	11	4	5	8
7:10p	3	0	1	0	3	1
8:10p	1	3	3	3	2	2

Westbound to Davis

6:20a	6	8	7	5	3	5
7:10a	3	0	0	0	2	0
8:10a	13	20	19	5	8	15
9:10a	4	13	13	4	4	9
10:10a	7	2	1	0	4	2
11:10a	3	9	9	3	3	6
12:10p	3	2	0	1	5	3
1:10p	3	5	5	2	3	5
2:10p	9	19	15	7	6	18
3:10p	2	8	9	6	5	7
4:10p	2	5	4	3	2	1
5:20p	8	19	18	13	12	13
6:20p	2	3	3	1	1	0

7:20p	1	2	2	1	2	3
8:20p	1	1	3	1	0	0

#142 Airport

Description - Restore all trips temporarily suspended in April 2022.

Background – Route 142 provides seven day a week service between downtown Sacramento and Sacramento International Airport, running every 30 minutes. In response to a major shortage in bus operators, frequency was temporarily reduced to every 60 minutes, effective in April 2022. This proposal would reverse that action, effective August 28, 2022.

Yolobus – Service to the airport is also provided once an hour by Yolobus Route 42. At times, SacRT has shifted its schedule to come in between Yolobus trips. This remains SacRT's preferred scheduling policy and it is especially important when frequency on Route 142 is longer (e.g., 60 minutes) however, it is not always possible. The April 2022 suspensions of service were made on an emergency basis, bypassing several steps in the ordinary process of preparing and bidding work shifts for operators. Consequently, SacRT was unable to make adjustments to trip times. SacRT was merely able to choose certain trips to suspend.

With the proposed restoration of 30-minute frequency on Route 142 in September, the ability to integrate schedules with Yolobus would be reduced: A route with 30-minute frequency cannot be timed with a route with 60-minute frequency to achieve even spacing both with itself and with the other route. At 30-minute frequency, the need for even spacing between the two routes is also somewhat reduced.

Yolobus has for several months been planning revisions to the schedule for Route 42 that would vary the arrival times in Downtown Sacramento and vary the frequency between trips. While these changes may make sense overall for Route 42, they will increase the difficulty of SacRT Route 42 having even spacing between Route 42 trips, or for such a solution to be coherent or desirable. SacRT will however continue to coordinate with Yolobus to achieve an optimal—if not ideal—solution to schedule integration.

Equity – Route 142 has very low rates of low-income ridership. For this reason, it should not be disproportionately excluded from systemwide reductions and should not be excessively prioritized for restoration or improvement.

Fiscal Impact – There is no budget impact from reversing temporary suspension of service, the original suspensions were themselves not treated as budget reductions.

#177 Rancho CordoVan Villages

Description – Make permanent the September 2021 addition of midday service on Route 177, including new trips approximately every 15 minutes from 9:24 am to 3:21 pm.

Background – Prior to the 2019 SacRT Forward project, fixed-route bus service was provided to the Zinfandel/Data Drive area of Rancho Cordova by both Route 74 and the Route 177. Route 74 provided hourly service on an east/west alignment, from Sunrise light rail station to Mather Field/Mills station. Route 177, which is funded by the City of Rancho Cordova, provided north/south service shuttling between the City Hall area and the Zinfandel light rail station.

These two routes were partly redundant during peak hours when Route 177 operated. Since Route 177 had stronger ridership per day and per vehicle hour, with the SacRT Forward project, Route 74 was eliminated, with its resources reallocated partly to improve weekend service on other Rancho Cordova routes. Elimination of Route 74, however, left a gap in transit service during the midday, when Route 177 did not operate.

In 2021, SacRT and City of Rancho Cordova staff collaborated to amend the agreement for Rancho CordoVan service adding midday service on Route 177, to fill this gap. The new midday service took effect on August 30, 2021. Like the rest of the CordoVan service, the new midday service was paid for by the City of Rancho Cordova, form a growing property-based revenue stream.

Demonstration Period – Under the amendment, the Route 177 midday service was approved temporarily for a maximum of twelve months. To be made permanent, SacRT must approve a Title VI service equity analysis for the new service (see the Title VI section of this report) and the City of Rancho Cordova must notify SacRT of its intent to make permanent the midday service prior to May 31, 2022. Unless both of these conditions occur, the midday service would be discontinued, effective July 1, 2022.

Ridership – Prior to the pandemic, average daily ridership on Route 177 was 140 boardings. Ridership dropped to approximately 44 daily boardings with the pandemic. The 18 new midday round trips began in September 2022. Ridership has since grown modestly to approximately 65 boardings per day. Approximately 9 boardings per day are being made on the midday service. The remainder of the growth is from existing trips. Some of that growth may have been enabled by the presence of midday trips. But it may also have arisen because of other factors, such as commuters returning to work in person. At 65 boardings per day, Route 177 is currently averaging 4.9 boardings per revenue vehicle hour.

Alternatives – For the sake of comparison SmaRT Ride service in Rancho Cordova currently averages 116 boardings per day over 24 revenue vehicle hours for productivity of 4.8 boardings per revenue hour. This is notable for being not only one of the most productive SmaRT Ride zones, but for being remarkably high productivity figures for demand response service as a mode, industry-wide. If the parties are dissatisfied with the performance of Route 177, the route could conceivably be eliminated and the funds reallocated to expand SmaRT Ride to the Zinfandel/Data Drive area. The pros and cons of such a change are discussed more below.

#177 Rancho CordoVan Villages Average Daily Boardings

	2019	2020	2021	2022
Jan	105	139	37	65
Feb	106	144	40	65
Mar	117	99	42	
Apr	112	47	38	
May	140	39	35	
Jun	126	42	48	
Jul	126	56	45	
Aug	133	42	46	
Sep	142	51	51	
Oct	146	48	40	
Nov	150	52	60	
Dec	139	37	57	

Capacity – As noted above, boardings per hour for SmaRT Ride are very similar to Route 177 at approximately 4.8. However, as also noted above, Route 177 averaged 140 boardings before the pandemic on only approximately 7.3 revenue hours per day, for productivity of 19.2 boardings per revenue hour. Fixed-route as a mode has much greater capacity than demand response service such as SmaRT Ride, where 4.8 boardings per hour may approach capacity.

Budgetary Control – With demand response service such as SmaRT Ride, costs can be more difficult to control than on fixed-route service. On SmaRT Ride, increasing ridership tends to impact wait times much more than on fixed-route service. Wait times on SmaRT Ride can typically only be reduced by increasing expenditures.

Connection Timing – SmaRT Ride would likely be a more flexible and effective way to serve the Zinfandel/Data Drive area for *intracity* transportation (i.e., movement to and from a large variety of points *within* Rancho Cordova). However, as a replacement for Route 177 (i.e., as a first/last mile shuttle to and from light rail) it might not function as satisfactorily, because of its greater variability in arrival and travel times.

#177 Rancho CordoVan Villages Plus Nearby Routes and SmarRT Ride



Example:

An everyday commuter to or from light rail can typically count on Route 177 being timed with every train, on the same schedule every day without the need to make reservations. The same traveler, using SmaRT Ride, would have to book a trip every day in both directions and be subject to the availability of a SmaRT Ride bus at that time. For persons making work trips, this level of variability may not be acceptable.

Zone Hours – If only the midday service on Route 177 was replaced with SmaRT Ride, that would provide only a single bus available for 6 hours to serve the Zinfandel area south of US-50. This might be difficult to present to a customer in the app and difficult to administer.

Example 1:

A user of the app is accustomed to seeing a polygon on a map, indicating the boundaries of the SmaRT Ride zone. If travel to or from certain parts of the zone are allowed only during certain hours (i.e., the midday) then the zone boundaries would effectively change throughout the day. This could be confusing to many users.

Example 2:

Marketing materials for SmaRT Ride typically portray a simple map with the zone boundaries and key points. Addition of smaller sub-zones with limited hours increases the complexity of the materials and difficulty of understanding.

Example 3:

Zones that vary in size by time of day have not been implemented by SacRT and its microtransit software provider. Technical issues could arise complicating implementation, troubleshooting, training, etc.

For the reasons above, it might be advisable to replace Route 177 with SmaRT Ride only as an entire all-day replacement. However, that would be subject to the concerns above (i.e., that existing Route 177 riders may be displeased with SmaRT Ride as a way to quickly and reliably shuttle to and from light rail).

Pilot Status – SmaRT Ride is currently funded by a grant from the Sacramento Transportation Authority, which expires on June 30, 2023. Permanent funding has been pursued, but not yet secured. It may be better to wait for permanent funding before any move to convert Rancho CordoVan service into SmaRT Ride service.

Commuters – With the COVID-19 pandemic appearing to diminish, many office workers returning to work, and gas prices surging, it might make sense to maintain Route 177 as-is, as a service more geared toward commuters, at this time.

Equity – Separate from the debate between fixed-route CordoVan service and SmaRT Ride, Route 177 itself has a very low percent of low-income riders. Additional expenditures on the route could be construed as overserving non-disadvantaged areas; however, SacRT has historically contended that the City's operating subsidy mitigates any such concerns. In other words, since SacRT recovers its costs for the CordoVan, no disadvantaged populations would forego any benefits they would otherwise receive, from increasing service on Route 177.

#193 Auburn Commuter

Description - Restore all trips temporarily suspended in April 2022.

Background - Route 193 provides peak-hour commuter express service between the Louis & Orlando transfer point and the Watt/I-80 light rail station consisting of four morning and four evening trips. In response to a major shortage in bus operators, this service was entirely suspended in April 2022. This proposal would reverse that suspension.

The COVID-19 pandemic reduced ridership on SacRT commuter bus routes by an average of 90 percent, compared to 70 percent for the overall system. Route 193 was selected as a route for April suspension due partly to low ridership and partly due to availability of possible alternatives, such as Routes 25 or 93, or driving to the Watt/I-80 park-and-ride lot.

Equity – Route 193 and most of SacRT's commuter routes have very low rates of low-income ridership. For this reason, these routes should not be disproportionately excluded from systemwide reductions and should not be excessively prioritized for restoration or improvement.

Fiscal Impact – There is no budget impact from reversing temporary suspension of service since the original suspension was itself not treated as a budget reduction.

#E37 UC Davis Health Elk Grove Express

Description - Introduce a new commuter express route from Elk Grove to UC Davis Health on Stockton Blvd, with six morning and six afternoon trips, with UC Davis Health providing operating funding.

Route - The new route would begin in the vicinity of Whitelock Road and Bruceville Road in Elk Grove, and pick up along Bruceville Road and Laguna Boulevard, before stopping at the Sheldon Road park-and-ride lot and then travelling non-stop via State Route 99 to UC Davis Health on Stockton Blvd, with a stop at Stockton Blvd. and Broadway to serve other nearby employers.

Schedule – The route would take approximately 25 minutes to get from Laguna Blvd. and Bruceville Road to UCDH, with morning arrivals every 30 minutes from 6:15 to 8:45 am and afternoon departures every 30 minutes from 4:15 to 6:45 pm.

Cost-Sharing - This potential new route is subject to completion of a cost-sharing agreement with UC Davis Health whereby UCDH would cover the direct cost of operations and maintenance as well as a new fleet of four shuttle buses.

Timing – Assuming an agreement finalized by July 2022 and eighteen months to select, procure, manufacture, and deliver four new buses, implementation is currently anticipated for January 2024.

Public Review - As a new service, this route requires a Title VI service equity analysis and 30-day public review and is being presented in this report to allow for the review to occur prior to finalization of a cost-sharing agreement, which would itself be contingent upon SacRT Board approval of the planned new service and its accompanying Title VI analysis. See the Title VI section of this report for more information.

Route Number – The route name and the number E37 are both subject to change. The letter "E" signifies that the route would be operated out of SacRT's Elk Grove division (although with a SacRT branded bus). The number 37 was chosen because it does not duplicate any existing routes and because it matches a former route serving Tahoe Park, near UCDH.

Equity – Demographics of the UCDH Elk Grove Express are not known, but assumed to be similar to existing Elk Grove commuter express routes, which have a high percentage of minority riders but a very low percentage of low-income riders. Accordingly, addition of this new service might be a concern if it were being self-funded by SacRT out of ordinary operating revenues (and a Title VI analysis would facially show a potential disproportionate burden). However, a full operating subsidy for the service would be viewed by Staff and recommended to the SacRT Board as a substantial, legitimate justification for introducing the service. See the Title VI section for more information.

Fiscal Impact – No net budget impact is expected from this service. Estimated direct operating costs of \$411,733 per year for the first year would be reimbursed by UC Davis Health. The capital cost for four new shuttle buses would also be covered by UC Davis Health at an estimated value of \$200,000 per bus or \$800,000 total. Fares would be retained by SacRT to help cover indirect/administrative costs.

#E37 UCDH Elk Grove Express Draft Timetable

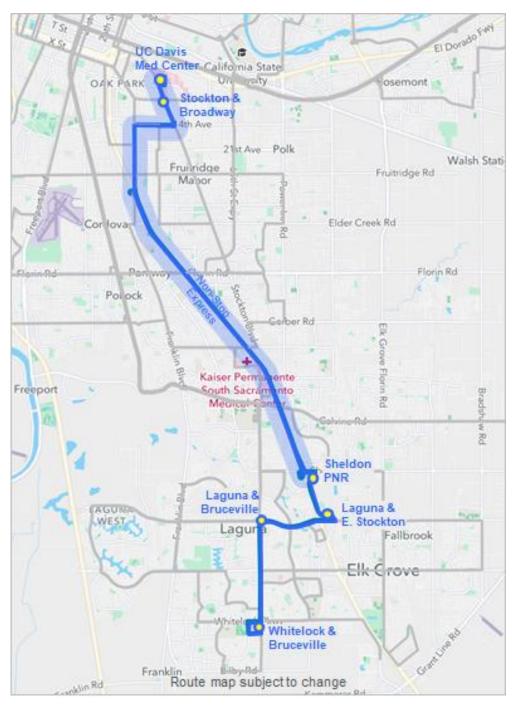
Subject to change

Whitelock	Laguna	E. Stockton	Sheldon	UCDMC
Bruceville	Bruceville	Bond	PNR	Arrive
			Arrive	
5:42a	5:48a	5:54a	5:55a	6:15a
6:12a	6:18a	6:24a	6:25a	6:45a
6:42a	6:48a	6:54a	6:55a	7:15a
7:06a	7:12a	7:18a	7:19a	7:45a
7:33a	7:39a	7:45a	7:46a	8:15a
8:08a	8:14a	8:20a	8:21a	8:45a
UCDMC	Sheldon	E. Stockton	Bruceville	Bruceville
Depart	PNR	Bond	Laguna	Whitelock
	Arrive			
4:15p	4:45p	4:47p	4:57p	5:07p
4:45p	5:14p	5:16p	5:26p	5:36p
5:15p	5:44p	5:46p	5:56p	6:06p
5:45p	6:09p	6:11p	6:21p	6:31p
6:15p	6:36p	6:38p	6:48p	6:58p
6:45p	7:05p	7:07p	7:17p	7:27p

Service to operate Monday to Friday except holidays

#E37 UCDH Elk Grove Express Conceptual Route Map

Subject to change



The new shuttle would connect residents of Elk Grove with UC Davis Health via a non-stop express along State Route 99.

#E110 Elk Grove Promenade

Description - Extend current route approximately 0.5 miles from Kaiser Medical Center to the planned Sky River Casino. Potentially also add Saturday trips and Sunday/Holiday service, pending completion of a cost-sharing agreement with the casino for service augmentation.

Casino Access – Sky River Casino is set to open this fall. To provide convenient access to the casino, SacRT Staff has been working with casino personnel to assure an operable route and curb space for full-size transit buses with convenient pedestrian access direct to a casino public entrance.

Service Augmentation – Currently Route E110 operates every 30 minutes on weekdays and every 60 minutes on Saturdays, with no service after 5:27 pm on Saturdays. These service levels predate SacRT's assumption of Elk Grove transit service and reflect funding and service levels in Elk Grove in place at the time of Elk Grove's annexation into SacRT on July 1, 2021.

These service levels are below-standard for SacRT, as established in the SacRT Forward project (where 7 days of service, service until at least 7:00 pm, and preferably better than 60-minute frequency were made a priority on all local routes). SacRT's Short Range Transit Plan has also identified a need for improved weekend service in both Elk Grove and Folsom. However, funding for these improvements (totaling over \$1.6 million per year in operating cost) has not yet been secured, and due to the lower ridership potential for weekend service in suburban communities, may not be SacRT's most urgent priority.

Accordingly, SacRT has sought to partner with Sky River Casino to subsidize the incremental increase in operating cost to provide more adequate weekend service on Route E110. Discussions are ongoing and have been constructive.

Schedule – Although the details are still under negotiation and subject to change, Staff is proposing to add trips on Saturday to achieve 30-minute frequency throughout the day and to extend evening hours to 9:51 pm. Sunday and holiday service would also be added on the same schedule, to achieve seven-day service with 30-minute frequency.

Cost-Sharing – As currently proposed by SacRT and being discussed, Sky River Casino would cover the incremental direct operating cost. There would be no need for new vehicles.

Timing – Both parties would ideally like any new augmented service to be ready when the casino opens this fall. In any event, the route extension will take effect this fall, to provide front-door access for transit riders.

Paratransit - SacRT already provides e-Van paratransit services on Sundays; however, the addition of Route E110 service on holidays would add a requirement to add e-Tran service on holidays, at least within 0.75 miles of Route E110. This cost would be covered by SacRT.

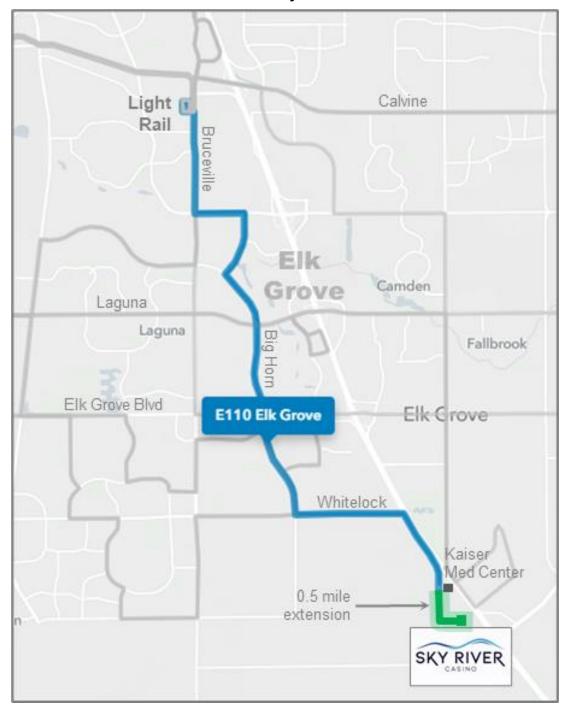
Fare Revenue – Increased fare revenue would help SacRT cover not only the ADA complementary paratransit requirements on holidays but also the overhead costs of adding dispatchers and supervisors on Sundays and holidays, which are currently unstaffed in Elk Grove.

Public Review – As an increase in service of more than 15 percent on Saturdays and an entirely new service day on Sundays and Holidays, under SacRT's major service change policy, service augmentation requires a Title VI service equity analysis and 30-day public review and is being presented in this report to allow for such review to occur prior to finalization of a cost-sharing agreement, which would itself be contingent upon SacRT board approval of the planned new

service and its accompanying Title VI analysis. See the Title VI section of this report for more information.

Fiscal Impact – No net budget impact is expected from extending the route or from augmenting service levels. The 0.5-mile extension can be operated without additional resources. The direct cost of augmented service levels (\$330,724 for the first year) would be reimbursed by Sky River Casino. Fares would help cover indirect/administrative costs and seven additional days per year of e-Van paratransit service.

#E110 Elk Grove Promenade Extension to Sky River Casino



Section II

Title VI Service Equity Analysis

Purpose of Title VI Analysis

Pursuant to SacRT's major service change policy and in accordance with federal Title VI civil rights requirements on non-discrimination, the purpose of this analysis is to quantitatively assess proposed service changes, identify and document whether the proposed changes would facially result in potential disparate impacts on minority populations or disproportionate burdens on low-income populations (DI/DB) and determine whether SacRT may proceed with the changes.⁸

Project Description

SacRT is currently considering several service changes, including the following:

Service Restorations – Routes 81, 102, 107, 134, 142, and 193 all had partial or entire suspensions of service beginning in April 2022 and approved without a Title VI analysis as temporary changes lasting no more than twelve months. SacRT is proposing to restore these services in Fall 2022.

Permanent Elimination – Routes 23, 82, and 86 had partial service suspensions in April 2022. SacRT is proposing to make permanent these suspensions.

SRTP Implementation – Changes are proposed to Routes 1, 26, 30, 33, 51, 81, 93, and 134 either as prescribed in SacRT's Short Range Transit Plan, or as developed on a standalone basis as a matter of routine system adjustments.

Contract Service – SacRT is proposing new or increased service to four contract services.

The service changes being considered are described in more detail in Section I of this report, a draft version of which was made available online at sacrt.com during a 30-day public review period beginning March 30, 2022.

⁸ 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.

Title VI Requirements

Under SacRT's major service change policy, creation of new routes and changes to more than 15 percent of a route are considered major service changes that require a Title VI service change equity analysis. Although not required, minor changes proposed to other routes have been included in this analysis as well.

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.

SacRT published a draft version of this plan for public review on March 30, 2022 and is now presenting a revised and final version of this report to the SacRT Board of Directors to seek approval for the service changes (contingent on completion of outside agreements, in the case of the contract service).

Definitions

Minority Definition - 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, or mixed race.

Low-Income Definition - 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. SacRT surveys typically ask about household income as a multiple-choice question with several ranges. SacRT treats all responses of \$25,000 or less as low-income. This approximates HHS guidelines and is a reasonable way to compare poverty rates from one route to another. ⁹

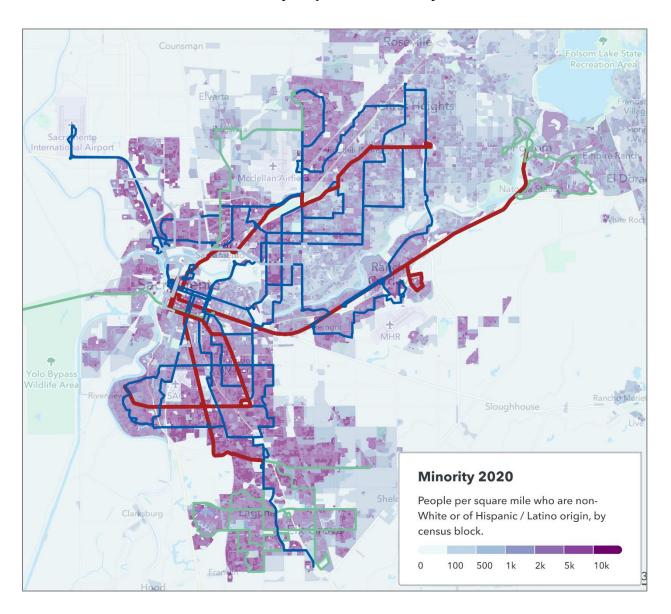
Baseline Data

Census Data – Based on Census data, the SacRT service area is 59 percent minority and 15 percent low-income. This data is presented for the sake of context; however, transit riders make up a small, non-representative fraction of the overall population, so service area statistics are not directly relevant to most Title VI service or fare equity analyses. Minority and low-income areas are shown on the maps on the following two pages.

⁹ For 2022, the poverty threshold is \$27,750 for a family of four in the 48 contiguous states.

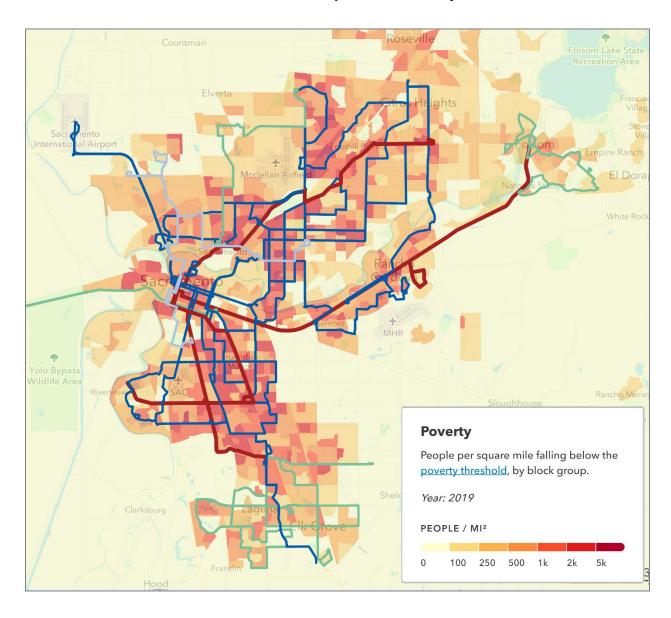
¹⁰ Computed in Remix software platform based on Census 2020 data and reflecting SacRT's annexed service area, effective July 1, 2022, following Elk Grove's annexation into the SacRT district.

Minority Population Density



Source: 2020 Census, prepared using Remix software

Low-Income Population Density



Source: 2019 American Community Survey, prepared using Remix software

Passenger Surveys – SacRT customers are estimated to be 69.0 percent minority and 53.0 percent low-income. Systemwide customer demographics are from a 2013 passenger survey, which was the most recent complete passenger demographic survey. An update was in progress in 2020 but was interrupted by the COVID-19 pandemic. For most individual bus routes, passenger survey data from 2015 and 2020 exists and was used to provide more up-to-date statistics, where possible. ¹¹

Existing SacRT Demographics

	Service Area	Actual Customers
Minority	59%	69.0%
Low-Income	15%	53.0%
Source:	2020 Census	2013 Passenger Surveys

Minority/Low-Income Routes – Passenger surveys are also used to estimate the minority and low-income splits of ridership for each route. Routes serving more than 69.0 percent minority riders are considered minority routes. Routes that are notable for below average minority ridership include Routes 134, 138, and 193. Routes with a very high percentage of minority riders include Routes 82 and E110.

Routes serving more than 53.0 percent low-income riders are considered low-income routes. Routes that are notable for below average low-income ridership include Routes 30, 38, 107, 134, 138, 142, 177, 193, E110, and potential new Route E37. Routes with a very high percentage of low-income riders include Route 33, 82, and 93.

Revenue Miles – Level of service is measured in revenue miles throughout this analysis. In other words, if changes are proposed on two different routes, revenue miles are used to weigh the magnitude of the two changes. Revenue miles are preferred for this analysis over revenue hours, because they better account for quality of service (i.e., they give greater relative weight to higher-speed services such as freeway express routes). ¹²

¹¹ The 2020 passenger survey was completed on the fixed-route bus system, but not on SacRT's light rail system.

¹² One revenue miles represents a bus in revenue service for one miles. Revenue hours represent a bus in revenue service for one hour. Revenue hours are a common transit industry proxy for operating cost.

Demographics of Affected Routes

Route	Name	Percent Minority	Percent Low Income	Minority	Low-Income
1	Greenback	60.7%	64.2%	No	Yes
23	El Camino	52.6%	56.5%	No	Yes
26	Fulton	71.0%	70.0%	Yes	Yes
30	J Street	67.7%	35.2%	No	No
33	Dos Rios	52.6%	94.7%	No	Yes
38	Tahoe Park	52.9%	41.2%	No	No
51	Stockton/Broadway	80.2%	57.3%	Yes	Yes
81	Florin	74.6%	62.9%	Yes	Yes
82	Northrop/Morse	84.1%	85.7%	Yes	Yes
86	Grand	79.2%	50.0%	Yes	No
93	Hillsdale	60.9%	70.0%	No	Yes
107	Land Park Express	62.5%	11.1%	No	No
134	McKinley Commuter	43.8%	0.0%	No	No
138	Causeway Connection	23.7%	36.4%	No	No
142	Airport	66.7%	21.1%	No	No
177	Rancho Cordovan	72.7%	21.9%	Yes	No
193	Auburn Commuter	25.0%	12.5%	No	No
E37	Elk Grove/UCDH Commuter	71.8%	5.3%	Yes	No
E110	Elk Grove Local	0.0%	0.0%	No	No
	SacRT System	69.0%	53.0%		

April 2022 Suspensions

Prior to analyzing new changes being considered, this report examines temporary suspensions made in April 2022. The April 2022 suspensions included entire or partial suspensions of service on Routes 23, 81, 82, 86, 107, 134, 142, and 193.

Under SacRT policy, a Title VI analysis was not required to make these suspensions; however, they may last no more than 12 months without undergoing a Title VI analysis. Although SacRT is proposing to undo most suspensions in September 2022, all suspensions have been analyzed, as a matter of due diligence, of transparency, and to maximize the SacRT Board's freedom to act. Table 1 (see Appendix) illustrates that the April 2022 suspensions were made equitably.

Minority Impacts - SacRT's ridership is 69.0 percent minority and minority populations constituted only 64.5 percent of the population on the suspended service.

Low-Income Impacts - SacRT's ridership is 53.0 percent low-income and low-income populations constituted only 30.4 percent of the population on the suspended service.

Inclusion of non-minority, non-low-income routes such as Routes 107, 134, 142, and 193 contributed to making this reduction equitable (i.e., assuring that the burden did not fall disproportionately on a route such as Route 81 which is a minority and low-income route).

Partial Permanent Eliminations

Effective in Fall 2022, SacRT is proposing to completely restore approximately 90 percent of the service suspended in April 2022 but make permanent the suspension of certain trips on Routes 23, 82, and 86. See Table 2 for details.

Minority Impacts – The service that would be eliminated would be 65.2 percent minority, which is less than the 69.0 percent minority share of systemwide ridership. This would therefore be favorable from a Title VI perspective.

Low-Income Impacts - The service that would be eliminated would be 59.5 percent low-income, which is more than the 53.0 percent low-income share of systemwide ridership. However, the difference does not exceed SacRT's 15 percent threshold of statistical significance.

The analysis above evaluates the April 2022 suspensions and proposed September 2022 permanent eliminations, for the sake of reference and transparency; however, what the SacRT Board of Directors must consider is the cumulative impact of all proposed changes.

All Proposed Changes

The entire package of proposed changes was evaluated in aggregate (see Table 3). In total, the proposed changes would result in a net increase in service.

Minority Impacts - Minority populations would receive 70.8 percent of the benefit, which is more than their 69.0 percent representation among SacRT ridership. This would be favorable from a Title VI perspective.

Low-Income Impacts - Low-income populations would receive 31.4 percent of the benefit, which is less than their 53.0 percent representation among SacRT ridership. This difference exceeds 15 percent, so it is considered both adverse and statistically significant.

This analysis shows that the entire package of changes might result in low-income populations not receiving an equitable share of the benefits; however, contract service weighs heavily in this analysis. There may be a substantial legitimate justification for the overall proposal if there is

substantial legitimate justification for the contract service and if the non-contract service alone lacks any potential disparate impacts.

Contract Service

The proposed changes include four existing or potential contract services (i.e., with UC Davis, the City of Rancho Cordova, UC Davis Health, and Sky River Casino).

Demographics – Minority populations are significantly underrepresented on the Causeway Connection and low-income populations are (or would be) significantly underrepresented on the Causeway Connection, Rancho CordoVan, and UCDH Elk Grove Express.

Title VI Profile of Contract Service

Route	Partner	Percent Minority	Minority Route?	Statistically Significant	Percent Low- Income	Low- Income Route?	Statistically Significant
138 Causeway Connection	UC Davis	23.7%	No	Yes	36.4%	No	Yes
177 Rancho CordoVan	City of Rancho Cordova	66.7%	No	No	30.0%	No	Yes
E37 UCDH Elk Grove Express	UC Davis Health (potential)	71.8%	Yes	n/a	5.3%	No	Yes
E110 Elk Grove Promenade	Sky River Casino (potential)	82.0%	Yes	n/a	62.3%	Yes	n/a
Benchmark: SacRT S	ystemwide Ridership	69.0%			53.0%		

Impacts – Based on the underrepresentation of disadvantaged populations, there are potential disparate impacts from implementing improvements on: (1) the Causeway Connection, (2) the Rancho CordoVan, and (3) the proposed new UCDH Elk Grove Shuttle (i.e., because disadvantaged populations would not receive an equitable share of the benefits). However, there is a substantial legitimate justification for proceeding with each service change: These services would use funding that is available only for this specific purpose. Moreover, that funding would cover all SacRT's costs for the improvements.

Non-Contract Service

The remaining non-contract service changes were analyzed in aggregate (see Table 4). Overall, these changes would increase SacRT service levels but only slightly, e.g. less than 0.1 percent.

Minority Impacts - Minority populations would receive 92.1 percent of the benefit, which is more than their 69.0 percent representation among SacRT ridership. This would be favorable from a Title VI perspective.

Low-Income Impacts – Low-income populations would receive 45.8 percent of the benefit, which is 7.2 percent less than their 53.0 percent representation among SacRT ridership; however, the difference does not exceed SacRT's 15 percent threshold of statistical significance.

Excluding the four contract services, the proposed changes would be slightly less favorable to low-income populations, but not statistically significant. This slightly adverse outcome might be partially mitigated as well by the fact that minority populations would disproportionately benefit from the changes.

Summary of Title VI Effects

Analysis	Benefit or Reduction?	Magnitude (Revenue Miles)	Percent Minority	Title VI Favorable	Statistically Significant	Percent Low-Income	Title VI Favorable	Statistically Significant
April 2022 Suspensions	Reduction	-291,121	64.5%	Favorable	n/a	30.4%	Favorable	n/a
Permanent Eliminations	Reduction	-19,864	65.2%	Favorable	n/a	59.5%	Not Favorable	No
All Proposed Changes	Net Benefit	+117,326	70.8%	Favorable	n/a	31.4%	Not Favorable	Yes
Non-Contract Service Changes	Net Benefit	+6,037	92.1%	Favorable	n/a	45.8%	Not Favorable	No
Benchmark: SacRT Systemwide Ridership			69.0%			53.0%		

Summary

The temporary service suspensions implemented in April 2022 were made equitably, i.e., although they were adverse to all groups, they did not result in any disparate impacts or disproportionate burdens. On a standalone basis, permanently eliminating approximately 10 percent of the service suspended in April 2022, as proposed, would have an above average impact on low-income populations, but it would not be statistically significant. These two analyses are not essential to the proposed action, however. The controlling analysis, with respect to SacRT's ability to proceed, is the cumulative effects of all proposed changes.

Cumulative Effects — Cumulatively, all proposed changes would result in a potential disproportionate burden on low-income populations (i.e., because they would not receive an equitable share of the benefits); however, this result is heavily influenced by three contract services with below-average low-income ridership. On a standalone basis, each of those three contract services appear to have a substantial legitimate justification, because their costs are covered by funds that are available only for those specific purposes. Collectively, the non-contract services would not have any potential disparate impacts or disproportionate burdens.

Justification - Since the cumulative analysis of all proposed changes shows a potential disproportionate burden on low-income populations, before SacRT may proceed, the SacRT Board must find that there is a substantial legitimate justification.

Staff believes a substantial legitimate justification exists for the overall package, because (1) the contract services that are unfavorable from a Title VI perspective have substantial legitimate justifications and (2) the remaining non-contract service changes would not have any potential disparate impacts or disproportionate burdens.

Next Steps – This draft Title VI service equity analysis is being made available for a 30-day public review and comment period beginning on March 30, 2022. SacRT intends to present to the SacRT Board of Directors a revised and final equity analysis as well as all public comments received on May 9, 2022. Staff anticipates then providing a recommendation to the SacRT Board to review and consider the comments, to accept and approve the final service equity analysis, and to approve the service changes themselves. ¹³

¹³ The proposed changes to contract service would still depend on partner agreements.

Appendix

Title VI Data Tables

Table 1
Impact of April 2022 Changes

All figures annualized

					<u>Minority</u>			<u>Low-Income</u>	
Route	Name	Proposed Change	Change in Revenue Miles	Percent Minority	Minority Impact	Non Minority Impact	Percent Low Income	Low Income Impact	Non Low Income Impact
23	El Camino	Suspend 8 trips	-11,044	52.6%	-5,813	-5,231	56.5%	-6,242	-4,802
81	Florin	Reduce frequency	-60,147	74.6%	-44,886	-15,261	62.9%	-37,835	-22,313
82	Northrop/Morse	Suspend 1 trip	-3,270	84.1%	-2,750	-520	85.7%	-2,803	-467
86	Grand	Suspend 2 trips	-5,550	79.2%	-4,394	-1,156	50.0%	-2,775	-2,775
107	Land Park Express	Suspend all trips	-15,850	62.5%	-9,906	-5,944	11.1%	-1,761	-14,089
134	McKinley Commuter	Suspend all trips, except two	-11,441	43.8%	-5,005	-6,435	0.0%	0	-11,441
142	Airport	Reduce frequency	-165,816	66.7%	-110,544	-55,272	21.1%	-34,909	-130,907
193	Auburn Commuter	Suspend all trips	-18,004	25.0%	-4,501	-13,503	12.5%	-2,250	-15,753

Total Changes	-291,121	64.5%	-187,798	-103,323	30.4%	-88,575	-202,546

Benchmark: SacRT System	69.0%	53.0%
Difference	-4.5%	-22.6%
Title VI Favorable?	Yes	Yes
Statistically Significant?	n/a	No
Disparate Impact/Disproportionate Burden?	No	No

Assumes all changes made permanent

Note: SacRT is proposing to undo most (not all) of these changes, effective on or around September 2022

This analysis has been prepared for reference, or in event that the SacRT board elects not to undo these changes as proposed

Table 2
Impact of Partial Permanent Eliminations

All figures annualized

			<u>Minority</u>				<u>Low-Income</u>			
Route	Name	Proposed Change	Change in Revenue Miles	Percent Minority	Minority Impact	Non Minority Impact	Percent Low Income	Low Income Impact	Non Low Income Impact	
23	El Camino	Permanently eliminate 8 trips	-11,044	52.6%	-5,813	-5,231	56.5%	-6,242	-4,802	
81	Florin	Restore all trips suspended April 2022	0	74.6%	0	0	62.9%	0	0	
82	Northrop/Morse	Permanently eliminate 1 tip	-3,270	84.1%	-2,750	-520	85.7%	-2,803	-467	
86	Grand	Permanently eliminate 2 trips	-5,550	79.2%	-4,394	-1,156	50.0%	-2,775	-2,775	
107	Land Park Express	Restore all trips suspended April 2022	0	62.5%	0	0	11.1%	0	0	
134	McKinley Commuter	Restore all trips suspended April 2022	0	43.8%	0	0	0.0%	0	0	
142	Airport	Restore all trips suspended April 2022	0	66.7%	0	0	21.1%	0	0	
193	Auburn Commuter	Restore all trips suspended April 2022	0	25.0%	0	0	12.5%	0	0	

Total Changes	-19,864	65.2%	-12,956	-6,908	59.5%	-11,820	-8,044
Benchmark: SacRT System		69.0%			53.0%		
Difference		-3.8%			6.5%		
Title VI Favorable?		Yes			No		
Statistically Significant?		n/a			No		
Disparate Impact/Disproportionate Burden?		No			No		

Effective in Fall 2022, SacRT is proposing to restore 90 percent of service suspended in April 2022

Suspensions of specific trips on Routes 23, 82, and 86 would be made permanent

Restored service is represented a zero change in service levels

Table 3
Impact of All Proposed Service Changes
All figures annualized

Minority Low-Income Change in Minority Revenue Percent Non Minority Percent Low Low Income Non Low **Proposed Change** Miles Route Name Minority Impact Impact Income Impact Income Impact 1 Greenback Add 1 trip on Saturday evening 433 60.7% 263 170 64.2% 278 155 56.5% 23 El Camino Permanently eliminate 8 trips -11,044 52.6% -5,813 -5,231 -6,242 -4,802 26 **Fulton** Add 3 weekday evening trips 5,436 71.0% 3,860 1,576 70.0% 3,805 1,631 30 J Street Add 5 weekday trips 7,198 67.7% 4,873 2,326 35.2% 2,533 4,666 33 Dos Rios Minor route adjustmnet 0 n/a n/a n/a n/a n/a n/a 38 Tahoe Park Schedule adjustments 0 n/a n/a n/a n/a n/a n/a 51 Stockton/Broadway Add 4 trips Saturday evenings 1,835 80.2% 1,471 363 57.3% 1,051 783 51 Stockton/Broadway Add 6 trips on Sunday/Holiday evenings 3,121 80.2% 2,503 618 57.3% 1,333 1,789 81 1,165 74.6% 869 296 62.9% 733 432 Florin Add 2 trips on Saturday evenings 62.9% 1,593 81 Florin Add 6 trips on Sunday/Holiday evenings 4,295 74.6% 3,205 1,090 2,702 0 74.6% 0 0 62.9% 0 0 81 Florin Restore all trips suspended April 2022 82 Northrop/Morse Permanently eliminate 1 trip -3,270 84.1% -2,750 -520 85.7% -2,803 -467 86 Grand Permanently eliminate 2 trips -5,550 79.2% -4,394 -1,156 50.0% -2,775 -2.775 93 Hillsdale Add 1 trip 2,418 60.9% 1,472 946 70.0% 1,693 725 107 Land Park Express Restore all trips suspended April 2022 0 62.5% 0 0 11.1% 0 0 0.0% 134 **McKinley Commuter** Restore all trips suspended April 2022 0 43.8% 0 0 0 0 138 10,922 23.7% 2,589 8,333 36.4% 3,976 6,946 **Causeway Connection** Add 2 trips 142 Airport Restore all trips suspended April 2022 0 66.7% 0 0 21.1% 0 177 Rancho Cordovan Permanently approve midday service 16,527 66.7% 11,018 5,509 30.0% 4,958 11,569 193 **Auburn Commuter** Restore all trips suspended April 2022 0 25.0% 0 0 12.5% 0 0 Elk Grove/UCDH Shuttle 47,549 2,524 E37 New commuter route 71.8% 34,138 13,411 5.3% 45,025

SacRT Title VI Program Update - 2023

E110	Elk Grove Promenade	Additional weekend service	36,291	82.0%	29,768	6,523	62.3%	22,602	13,689
		Total Changes	117,326	70.8%	83,072	34,254	31.4%	36,822	80,504
		Benchmark: SacRT System		69.0%			53.0%		
		Difference		1.8%			-21.6%		
		Favorable?		Yes			No		
		Statistically Significant?		n/a			Yes		
		Disparate Impact/Disproportionate Burden?		No			Yes		

Restored service is represented a zero change in service levels

Table 4
Impact of Non-Contract Service Changes
All figures annualized

					<u>Minority</u>			<u>Low-Income</u>	
Route	Name	Proposed Change	Change in Revenue Miles Po	ercent Minority	Minority Impact	Non Minority Impact	Percent Low Income	Low Income Impact	Non Low Income Impact
1	Greenback	Add 1 trip on Saturday evening	433	60.7%	263	170	64.2%	278	155
23	El Camino	Permanently eliminate 8 trips	-11,044	52.6%	-5,813	-5,231	56.5%	-6,242	-4,802
26	Fulton	Add 3 weekday evening trips	5,436	71.0%	3,860	1,576	70.0%	3,805	1,631
30	J Street	Add 5 trips	7,198	67.7%	4,873	2,326	35.2%	2,533	4,666
33	Dos Rios	Minor route adjustmnet	0	n/a	n/a	n/a	n/a	n/a	n/a
38	Tahoe Park	Schedule adjustments	0	n/a	n/a	n/a	n/a	n/a	n/a
51	Stockton/Broadway	Add 4 trips on Saturday evenings	1,835	80.2%	1,471	363	57.3%	1,051	783
51	Stockton/Broadway	Add 6 trips on Sunday/Holiday evenings	3,121	80.2%	2,503	618	57.3%	1,789	1,333
81	Florin	Add 2 trips on Saturday evenings	1,165	74.6%	869	296	62.9%	733	432
81	Florin	Add 6 trips on Sunday/Holiday evenings	4,295	74.6%	3,205	1,090	62.9%	2,702	1,593
81	Florin	Restore all trips suspended April 2022	0	74.6%	0	0	62.9%	0	0
82	Northrop/Morse	Permanently eliminate 1 trip	-3,270	84.1%	-2,750	-520	85.7%	-2,803	-467
86	Grand	Permanently eliminate 2 trips	-5,550	79.2%	-4,394	-1,156	50.0%	-2,775	-2,775
93	Hillsdale	Add 1 trip	2,418	60.9%	1,472	946	70.0%	1,693	725
107	Land Park Express	Restore all trips suspended April 2022	0	62.5%	0	0	11.1%	0	0
134	McKinley Commuter	Restore all trips suspended April 2022	0	43.8%	0	0	0.0%	0	0
142	Airport	Restore all trips suspended April 2022	0	66.7%	0	0	21.1%	0	0
193	Auburn Commuter	Restore all trips suspended April 2022	0	25.0%	0	0	12.5%	0	0
		Total Changes	6,037	92.1%	5,560	477	45.8%	2,763	3,274

Benchmark: SacRT System	69.0%	53.0%
Difference	23.1%	-7.2%
Favorable?	Yes	No
Statistically Significant?	n/a	No
Disparate Impact/Disproportionate Burden?	No	No

Restored service is represented a zero change in service levels



Service Changes for 2023 Final Plan and Title VI Equity Analysis

January 23, 2023

Overview

SacRT is currently considering major service changes on several bus routes, as discussed in this Final Plan and Title VI Equity Analysis, which has been divided into two parts:

- Part I: Fixed-Route Service Changes discusses continuation of suspensions on five SacRT bus routes (Routes 81, 107, 134, 142, and 193); and
- Part II: Title VI Service Equity Analysis analyzes the changes in Part I, in accordance with the Title VI provisions of SacRT's major service change policy.

Public Review

In accordance with SacRT's major service change policy, a draft version of this was made available to the public via sacrt.com on Friday, December 16, 2022. Comments were taken through Monday, January 16, 2023 and have been included in the agenda item that would review and approve this report and the proposed changes therein, which is to be presented to the SacRT Board of Directors on Monday, January 23, 2023, for approval.

Part I

Fixed-Route Service Changes

Background

In April 2022, SacRT temporarily suspended all or part of Routes 23, 81, 82, 86, 107, 134, 142, and 193 to address a shortage in bus operators which had been resulting in systemwide reliability problems. By suspending approximately 3 percent of bus service, SacRT sought to better allow customers to plan around system outages, rather than be subject to unplanned trip cancellations.

The April suspensions were approved without a 30-day public review, on the basis that they were considered temporary, lasting no more than twelve months, and therefore did not constitute major service changes under SacRT policy. On May 9, 2022, after the changes had taken effect, SacRT presented and the SacRT Board of Directors approved a restoration plan to take effect in September 2022, including a Title VI service equity analysis and a 30-day public review.

The approved restoration plan called for:

- (1) Full restoration of service on Routes 81, 107, 134, 142, and 193.
- (2) Permanent elimination of a total of eight trips on Route 23, one trip on Route 82, two trips on Route 86 due to underutilization or redundancy with similarly timed trips.
- (3) Minor improvements to Routes 1, 26, 30, 51, 81, 93, and 138, mostly in the form of additional weekend or evening trips.
- (4) A minor adjustment to the routing of Route 33.
- (5) Finalization of required approvals to make permanent midday service on Route 177 (funded by the City of Rancho Cordova).
- (6) Authorization to proceed with plans for a new commuter express Route E37 from Elk Grove to the UC Davis Medical Center.
- (7) A minor extension to Route E110.

This plan was approved by the SacRT Board, but the service restoration and minor improvements (Items 1 and 3) were never implemented, because hiring and training of new bus operators over Summer 2022 was not sufficient to alleviate the operator shortage.

Under SacRT policy, the suspensions in effect on Routes 81, 107, 134, 142, and 193 must end in April 2022, at the end of their 12-month temporary period, unless the Board takes action to continue suspension. In other words, service must be restored on those five routes, unless there is Board action.

Proposed Changes

Proposal – SacRT is proposing to keep in place all suspensions currently in effect.

Fiscal Impact – There is no fiscal impact from the proposed action.

Justification – Although SacRT's financial position has been much improved over the past years, without the passage of a new local measure, with significant Smart Ride funding ending on June 30, 2023, with one-time stimulus funding coming to an end over the next two years, and with operator availability continuing to be insufficient for expansion, Staff believes that service levels should remain at current levels.

Alternatives - To restore all five routes to full service would increase annual operating cost by approximately \$2.0 million. Staff also evaluated an alternative plan where service would be fully restored on Routes 81 and 142, partly restored on Route 193, and kept as-is on Routes 107 and 134. That plan would have increased annual operating cost by approximately \$1.67 million.

Equity – As shown in Part II, the Title VI service equity analysis, there are no likely disparate impacts to minority populations nor disproportionate burdens to low-income populations from making these suspensions permanent. Route 81 is the only of the five routes with above average minority and low-income ridership. The adverse effects of keeping Route 81 partially suspended are offset by Route 142. Route 142 has a very low fraction of minority and low-income riders, so keeping it partially suspended offsets what would otherwise be adverse effects from keeping Route 81 suspended.

Suspended Routes

#81 Florin

Proposal - Normal weekday service levels for Route 81 are every 30 minutes on 65th Street and every 15 minutes on Florin Road. Currently, frequency on Florin Road has been reduced to only every 30 minutes during the mid-morning period. Staff recommends keeping the current service level.

Fiscal Impact – Fully restoring service on Route 81 would add approximately 22.2 revenue hours of service per day, on weekdays only, at a cost of approximately \$700,000 per year. It does not require any additional peak buses, but would require approximately four additional operators (three in service each day, plus one spare operator to cover absences).

Equity – Route 81 is above average for both minority and low-income ridership and traverses several disadvantaged communities along Florin Road. Keeping Route 81 suspended is not favorable from a Title VI standpoint, but the effects are offset by keeping Route 142 partially suspended, as shown in Part II.

Justification – Although it serves a disadvantaged community, and although frequent service is desirable and valuable on a major corridor such as Florin Road, Staff believes the frequency reduction on Route 81 has been an effective and minimally impactful way to significantly reduce cost and operator requirement. Staff reviewed data on passenger loads and spoke with field supervisors and concluded that some buses have heavy loads around morning school trips, but there have been few if any cases of full buses. The times around which the passenger loads are heavy are also times when there happen to be 15-minute headways, so in the event of a full bus, the wait is not a full 30 minutes. Apart from school times, passenger loads have not approached capacity.

#107 South Land Park Express

Proposal – Staff recommends continued suspension of all three morning trips (6:09, 6:39, and 7:09 am) and all three afternoon trips (4:15, 4:45, and 5:15 pm) on Route 107.

Justification - Ridership recovery from the pandemic has been poorest on commuter routes such as Route 107. Prior to suspension in April 2022, the six trips on Route 107 were averaging just 3 boardings each.

Equity - Riders on Route 107 are disproportionately higher-income and are more likely to own a car, less likely to be reliant on transit, and possibly more likely to be able to work from home. While restoration of Route 107 might help achieve environmental benefits by reducing automobile commuting, it is less likely to achieve equity goals of prioritizing service to disadvantaged communities.

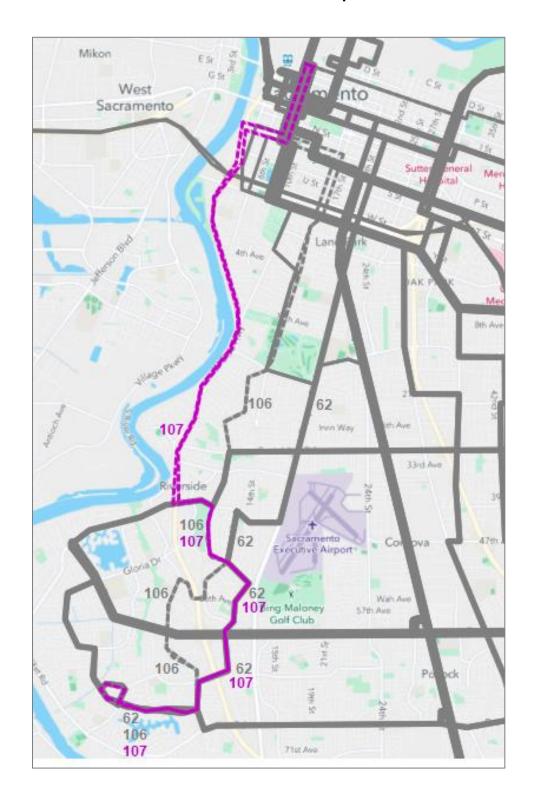
Alternatives - Route 62 already has departures from the same starting point (Pocket Transit Center) at 6:11, 6:41, and 7:11 am and from downtown at 4:10, 4:40, and 5:10 pm; the two routes serve almost the exact same bus stops. Route 106 also has departures from Pocket Transit Center at 7:13 am and from downtown at 4:07 and 5:07 pm and covers many of the same stops as Route 107, including the few stops on Route 107 that are not covered by Route 62.

The main purpose of Route 107 was to offer a faster, more direct non-stop express route to downtown than Route 62, by picking up riders only in Pocket/Greenhaven, then bypassing Land Park via Interstate 5. This was justified before the pandemic, when the Pocket/Greenhaven area alone generated enough commuters to fill a bus, and there was sufficient demand to fill an entire bus in Pocket/Greenhaven and then express it to downtown via the freeway. With COVID-related changes to commute patterns, that is no longer the case.

Ridership on the 6:11, 6:41, and 7:11 am Route 62 trips to downtown averages 4, 13, and 14. If or when ridership begins to exceed 20 to 25 passengers on these trips, then Staff recommends revisiting the restoration of Route 107 service, especially if those riders are largely from the Pocket/Greenhaven segment of the route.

Fiscal Impact – No changes are being proposed to Route 107 at this time. If it was fully restored, Route 107 would amount to only 3.1 revenue hours per day; however, restoring it could increase SacRT's vehicle requirement by up to three buses and require up to six additional operators.

#107 South Land Park Express



#134 McKinley Commuter

Proposal – Staff recommends continuing existing suspensions on Route 134. Full service for the route includes three morning trips (beginning at 6:03, 7:03, and 8:03 am) and four afternoon trips (beginning at 2:30, 3:20, 4:20, and 5:20 pm). Currently, only the 7:03 am and 2:30 pm trips are being operated.

Justification – The 7:03 am and 2:30 pm trips are averaging 25 and 18 boardings per day, respectively, and are used primarily by Sutter Middle School students. The remaining trips, which are currently suspended, serve downtown commuters and were averaging only 4 daily riders per trip before suspension in April 2022.

Equity - Route 134 has the lowest percent of low-income riders in the SacRT system. The route primarily serves East Sacramento, which is a higher-income community, so riders are more likely to own a car, less likely to rely on transit, and possibly more likely to be able to work from home. While restoration of Route 134 might help achieve environmental benefits by reducing automobile commuting, it is less likely to benefit disadvantaged communities.

Alternatives - Route 30 is not as convenient for Route 134 riders but may be a viable alternative for at least some Route 134 riders.

Fiscal Impact – No changes are being proposed to Route 134 at this time, but if it was fully restored, the five additional trips on Route 134 would add 4.0 revenue hours per day to the schedule. SacRT's vehicle requirement would likely increase by zero to two buses. SacRT's operator requirement would likely increase by three operators.

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#134 McKinley Commuter

#142 Airport

Proposal – Currently, Route 142 is operating once an hour. Prior to April 2022, the service was operating at 30-minute frequency all day, from approximately 4:45 am to 11:29 pm. Staff recommends keeping the current service levels.

Fiscal Impact – Fully restoring service on Route 142 would add approximately 18.5 revenue hours of service per day, seven days a week, at a cost of approximately \$840,000 per year. It would increase the daily vehicle requirement by one bus and increase the operator requirement by an estimated five operators (four to cover the daily work, plus one spare operator to cover absences).

Equity – Ridership on Route 142 does not tend to be from disadvantaged populations. Keeping Route 142 partially suspended is important as long as Route 81 is also suspended, because it offsets would otherwise be potential disproportionate burdens on low-income populations, as shown in Part II.

Justification – Although Route 142 enjoys considerable public support and is the first or only interaction many Sacramento residents and visitors have with SacRT, Staff believes the frequency reduction on Route 142 has been an effective and minimally impactful way to significantly reduce cost and operator requirement. Although 30 minutes is a more useful frequency for an airport bus, airport travelers tend to be higher income, with other options for getting to/from the airport. An hourly airport bus, while not ideal, provides a basic link for persons for whom parking or taking a taxi or ride share to the airport is cost prohibitive. Route 142 is also not a strong performer financially for SacRT, with a cost per passenger of approximately \$21 (approximately double the average for SacRT Bus overall).

Schedule Adjustments – Earlier in 2022, Yolobus altered the schedule of its Route 42 (its bus to the airport) in a way that has been less useful in tandem with Route 142. Previously, Routes 42 and 142 were both on uniform hourly headways, and trips were slotted evenly between one another to achieve even 30-minute headways between the two routes. In Fall 2022, Yolobus redesigned Route 42 to run more frequently during busy times, and less frequently during off-hours. This has resulted in uneven spacing between Routes 42 and 142, with some buses often just a few minutes apart. With the Route 42 schedule no longer adhering to uniform frequency, it is not possible for an hourly Route 142 to slot evenly between the Route 42; however, Staff will work with Yolobus, and if any revisions to its schedule for Route 42 are considered, Staff will endeavor to coordinate schedules as best as possible.

#193 Auburn Commuter

Proposal – Normal service levels on Route 193 are four morning trips and four afternoon trips between Citrus Heights and the Watt/I-80 light rail station, running non-stop on the freeway from Greenback Lane. Currently, all eight trips are suspended. Staff recommends keeping existing service levels in place as-is.

Fiscal Impact – Restoring all eight trips on Route 193 would add approximately 2.9 revenue hours of service per day, on weekdays, at a cost of approximately \$180,000 per year. It would increase the daily vehicle requirement by at least two buses and increase the operator requirement by an estimated four operators.

Justification – Prior to suspension, ridership on the suspended trips averaged only 3 daily boardings each.

Equity – Ridership on Route 193 is only 25.0 percent minority and only 12.5 percent low-income, both of which are well below SacRT's systemwide average. The low fraction of low-income riders suggests that Route 193 riders are more likely to own a car, less likely to rely on transit, and possibly more able to work from home.

Summary

SacRT is proposing to keep in place all suspensions currently in effect. To restore all five routes to full service would increase annual operating cost by approximately \$2.0 million. An affirmative action of the Board is required to continue these suspensions beyond April 2, 2023, as recommended in this plan. Prior to taking such an action, SacRT must prepare a Title VI analysis (Part II of this report), make it available for 30-day public review, and collect and consider public comments on the plan and the analysis. This report is planned for public release on December 16, 2022. Staff intends to present a revised final version of this plan to the SacRT Board at its regular meeting of January 23, 2023.

Part II

Title VI Service Equity Analysis

Purpose of Title VI Analysis

Pursuant to SacRT's major service change policy and in accordance with federal Title VI civil rights requirements on non-discrimination, the purpose of this analysis is to quantitatively assess proposed service changes, identify and document whether the proposed changes would facially result in potential disparate impacts on minority populations or disproportionate burdens on low-income populations (DI/DB) and determine whether SacRT may proceed with the changes.¹⁴

Proposed Changes

Continuation of Suspensions – Routes 81, 107, 134, 142, and 193 had partial or entire suspensions of service beginning on April 3, 2022. Several other routes also had partial suspensions at that time, which were made permanent by the SacRT Board on May 9, 2022; however, the service reductions implemented on these five routes were never approved, other than on a temporary twelve-month basis, beginning April 3, 2022. SacRT is proposing to continue these suspensions indefinitely, beyond April 2, 2023, in the hopes of restoring them at a future date. To continue the service reductions beyond April 2, 2023, as proposed, this Title VI analysis is required.

Public Review

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.

A draft analysis was made available on sacrt.com for public comment from December 16, 2022 through January 16, 2023. All comments have been included in the agenda item for this final report, for presentation to the SacRT Board on January 23, 2023.

Definitions

Minority Definition - 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, or mixed race.

Low-Income Definition - 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. SacRT surveys typically ask about household income as a multiple-choice question with several ranges. SacRT treats all responses of \$25,000 or less as low-income. This approximates HHS guidelines and is a reasonable way to compare poverty rates from one route to another. ¹⁶

¹⁴ 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.

¹⁵ On May 9, 2022, the SacRT Board approved a plan to fully restore service on those routes, effective September 2022; however, that plan was not implemented, due to SacRT's operator shortage unexpectedly remaining severe into Fall 2022.

¹⁶ For 2022, the poverty threshold is \$27,750 for a family of four in the 48 contiguous states.

Baseline Data

Census Data – Based on Census data, the SacRT service area is 59 percent minority and 15 percent low-income.¹⁷ This data is presented for the sake of context; however, transit riders make up a small, non-representative fraction of the overall population, so service area statistics are not directly relevant to most Title VI service or fare equity analyses. Minority and low-income areas are shown on the maps on the following two pages.

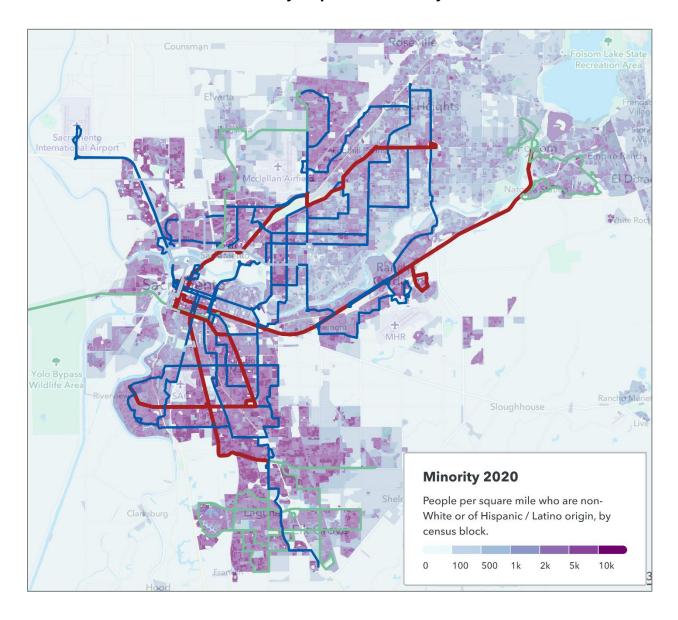
Passenger Surveys – SacRT customers are estimated to be 69.0 percent minority and 53.0 percent low-income. Systemwide customer demographics are from a 2013 passenger survey, which was the most recent complete passenger demographic survey. An update was in progress in 2020, was interrupted by the COVID-19 pandemic, and was recently resumed; however, completion is not expected until January 2023. For most individual bus routes, passenger survey data from 2015 and 2020 exists and was used to provide more up-to-date statistics, where possible.

Existing SacRT Demographics

	Service Area	Actual Customers
Minority	59%	69.0%
Low-Income	15%	53.0%
Source:	2020 Census	2013 Passenger Surveys

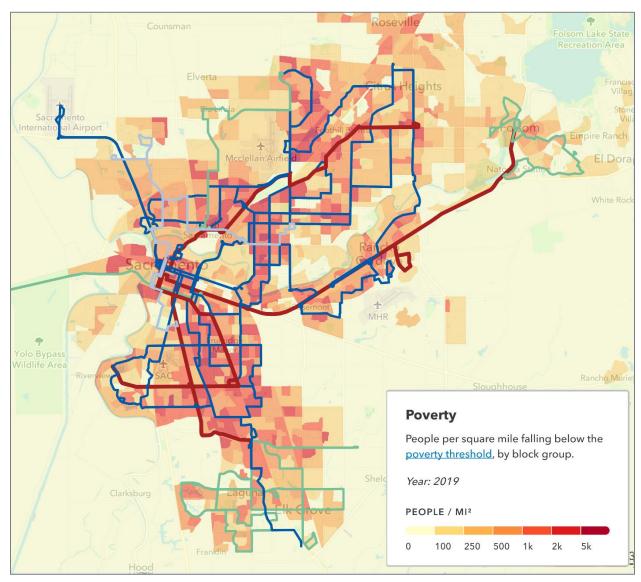
¹⁷ Computed in Remix software platform based on Census 2020 data and reflecting SacRT's annexed service area, effective July 1, 2022, following Elk Grove's annexation into the SacRT district.

Minority Population Density



Source: 2020 Census, prepared using Remix software

Low-Income Population Density



Source: 2019 American Community Survey, prepared using Remix software

Minority/Low-Income Routes – Passenger surveys are also used to estimate the minority and low-income splits of ridership for each route. Routes serving more than 69.0 percent minority riders are considered minority routes. Routes serving more than 53.0 percent low-income riders are considered low-income routes.

Revenue Miles – Level of service is measured in revenue miles throughout this analysis. In other words, if changes are proposed on two different routes, revenue miles are used to weigh the magnitude of the two changes. Revenue miles are preferred for this analysis over revenue hours, because they better account for quality of service (i.e., they give greater relative weight to higher-speed services such as freeway express routes). ¹⁸

Demographics of Affected Routes

Route	Name	Percent Minority	Percent Low Income	Minority	Low-Income
81	Florin	74.6%	62.9%	Yes	Yes
107	Land Park Express	62.5%	11.1%	No	No
134	McKinley Commuter	43.8%	0.0%	No	No
142	Airport	66.7%	21.1%	No	No
193	Auburn Commuter	25.0%	12.5%	No	No
	SacRT System	69.0%	53.0%		

¹⁸ One revenue mile represents a bus in revenue service for one mile. Revenue hours represent a bus in revenue service for one hour. Revenue hours are a common transit industry proxy for operating cost.

Minority Results

SacRT is proposing to make permanent complete or partial suspensions on five routes, amounting to a reduction of 272,280 revenue miles per year. Approximately 64.5 percent of the reduction would affect minority populations; however, minority riders make up approximately 69.0 percent of SacRT's ridership, so minority populations would bear slightly less than their share of the burden.

Since Route 81 is a minority route and makes up approximately 22 percent of the reduction, it is important that the other four routes—none of which are minority routes—are included in the proposal.

Conclusion - There would not be a disparate impact to minority populations from the proposed changes.

Route	Names	Percent Minority	Change in Revenue Miles	Minority Revenue Miles	Non-Minority Revenue Miles
81	Florin	74.6%	-61,039	-45,535	-15,504
107	Land Park Express	62.5%	-15,850	-9,906	-5,944
134	McKinley Commuter	43.8%	-11,441	-5,011	-6,430
142	Airport	66.7%	-165,947	-110,687	-55,260
193	Auburn Commuter	25.0%	-18,004	-4,501	-13,503
	All Changes	64.5%	-272,280	-175,640	-96,640
-	SacRT System	69.0%			

Low-Income Results

SacRT is proposing to make permanent complete or partial suspensions on five routes, amounting to a reduction of 272,280 revenue miles per year. Approximately 28.4 percent of the reduction would affect low-income populations. This is significantly below SacRT's systemwide average of 53.0 percent low-income riders, so low-income populations would bear considerably less than their share of the burden.

Route 81 riders are 62.9 percent low-income, and Route 81 makes up 22 percent of the reduction, but this adverse effect on low-income populations is more than offset by Route 142, which makes up 60 percent of the reduction and has ridership that is only 21.1 percent low-income.

Conclusion - There would not be a disproportionate burden to low-income populations from the proposed changes.

Low-Income Results

Route	Name	Percent Low- Income	Change in Revenue Miles	Low-Income Revenue Miles	Non-Low-Income Revenue Miles
81	Florin	62.9%	-61,039	-38,393	-22,645
107	Land Park Express	11.1%	-15,850	-1,759	-14,090
134	McKinley Commuter	0.0%	-11,441	0	-11,441
142	Airport	21.1%	-165,947	-35,015	-130,932
193	Auburn Commuter	12.5%	-18,004	-2,250	-15,753
	All Changes	28.4%	-272,280	-77,418	-194,862
	SacRT System	53.0%			

Summary

In April 2022, SacRT implemented complete or partial reductions in service on several bus routes without public review or a Title VI equity analysis, on a temporary basis of no more than twelve months. In May 2022, the SacRT Board approved a publicly reviewed Title VI analysis of a plan to restore service on several of those routes and to make minor reductions on several of those routes permanent; however, five of the routes (Routes 81, 107, 134, 142, and 193) planned to be restored to full service in September 2022 were not actually changed at that time. Instead, they remained fully or partially suspended. SacRT is now considering extending the existing service reductions on these routes beyond the original twelve-month period indefinitely. Based on this Title VI service equity analysis, the proposed action would be unlikely to result in a disparate impact to minority populations or a disproportionate burden to low-income populations.

Next Steps – A draft version of this Title VI service equity analysis was made available for a 30-day public review and comment period beginning on December 16, 2022. This revised and final equity analysis, as well as all public comments, are hereby presented to the SacRT Board of Directors at its regular meeting January 23, 2023. Staff recommends that the SacRT Board review and consider the comments, accept and approve the final service equity analysis, and adopt the service changes.