

THIS PRINT COVERS CALENDAR ITEM NO.: 11b

**SAN FRANCISCO
MUNICIPAL TRANSPORTATION AGENCY**

DIVISION: Transit

BRIEF DESCRIPTION:

Approving the SFMTA’s Title VI Service Equity Analysis of the Central Subway Project (Phase 2 of the T Third Street Line Light Rail Transit Project), required by the Federal Transit Administration for New Starts Projects, which found the Central Subway Project had no disparate impact on communities of color or disproportionate burden on low-income communities under Title VI of the Civil Rights Act of 1964.

SUMMARY:

- The Central Subway Project (Project) includes a 1.7-mile extension of the T Third Street Line and will run from the 4th Street Caltrain Station along a Fourth/Stockton alignment to Chinatown, providing a direct transit link between Visitacion Valley, Bayview, and Mission Bay to South of Market, Union Square, Downtown and Chinatown.
- The largest source of funding for the Project is provided by the Federal Transit Administration’s (FTA’s) New Starts program.
- FTA Circular 4702.1B requires that a Title VI service and fare equity analysis be conducted for New Starts projects six months prior to the beginning of revenue operations, whether or not the proposed changes meet the transit provider’s criteria for a “major service change,” as defined below.
- FTA Circular 4702.1B requires that proposed changes to lines running parallel or connecting to the New Starts Project also be examined. Service changes to lines parallel or connecting to the T Third Street Line that would have the same implementation date as the Project are continuing to be refined and will be examined upon finalization.
- As the Project does not include a fare change, no fare equity analysis is required.
- A previous Title VI service equity analysis of the Project was approved as part of SFMTA Board Resolution No. 180320-047 on March 20, 2018. An updated Title VI analysis was conducted in April 2022 in anticipation of the Project’s planned start of revenue service in Fall 2022 and uses 2016-2020 American Community Survey 5-Year Estimates data, the most recently available U.S. Census data.

ENCLOSURES:

1. SFMTA Board Resolution
2. Title VI Service Equity Analysis of the Central Subway Project
3. <https://www.sfmta.com/reports/central-subway-final-seis-seir>
4. <https://archives.sfmta.com/cms/cmta/documents/2008%20Resolutions/08-19-08-08-150.pdf>

APPROVALS:

DATE

DIRECTOR 

June 16, 2022

SECRETARY 

June 16, 2022

ASSIGNED SFMTAB CALENDAR DATE: June 21, 2022

PURPOSE

Approving the SFMTA’s Title VI Service Equity Analysis of the Central Subway Project (Phase 2 of the T Third Street Line Light Rail Transit Project), required by the Federal Transit Administration for New Starts Projects, which found the Central Subway Project had no disparate impact on communities of color or disproportionate burden on low-income communities under Title VI of the Civil Rights Act of 1964.

STRATEGIC PLAN GOALS AND TRANSIT FIRST POLICY PRINCIPLES

This action supports the following SFMTA Strategic Plan Goals:

- Goal 1: Identify and reduce disproportionate outcomes and resolve past harm towards marginalized communities.
- Goal 5: Deliver reliable and equitable transportation services.
- Goal 6: Eliminate pollution and greenhouse gas emissions by increasing use of transit, walking and bicycling.
- Goal 7: Build stronger relationships with stakeholders.

This item addresses the following San Francisco Transit-First Policy Principles:

1. To ensure quality of life and economic health in San Francisco, the primary objective of the transportation system must be the safe and efficient movement of people and goods.
2. Public transit, including taxis and vanpools, is an economically and environmentally sound alternative to transportation by individual automobiles. Within San Francisco, travel by public transit, by bicycle and on foot must be an attractive alternative to travel by private automobile.
9. The ability of the City and County to reduce traffic congestion depends on the adequacy of regional public transportation. The City and County shall promote the use of regional mass transit and the continued development of an integrated, reliable, regional public transportation system.

DESCRIPTION

The Central Subway Project (Project) is Phase 2 of the SFMTA’s T Third Street Line Light Rail Transit Project. The Project includes a 1.7-mile extension of the T Third Street Line along a Fourth/Stockton alignment and will run from the 4th Street Caltrain Station to Chinatown, providing a direct transit link between Visitacion Valley, Bayview, and Mission Bay to South of Market, Union Square, Downtown and Chinatown. Four new stations are being constructed as part of the Project. These include an at-grade station at 4th and Brannan streets and three underground stations: Yerba Buena/Moscone Center (YBM) Station, Union Square/Market Street (UMS) Station, and Chinatown/Rose Pak (CTS) Station.

Currently, the T Third Line is interlined with the K Ingleside Line as the KT Ingleside/Third Line. In the southbound direction, the T Third Line travels from West Portal to the Embarcadero, Mission Bay, Dogpatch, Third Street, and the Bayview District before terminating at Bayshore/Sunnydale in Visitacion Valley. In the northbound direction, the T Third travels from Bayshore/Sunnydale and

terminates at the Embarcadero. There it becomes the K Ingleside Line, continues in the Market Street subway to West Portal, and terminates at Balboa Park Station.

When the Project opens for revenue service – currently planned for Fall 2022 – the T Third Line will no longer be interlined with the K Ingleside Line. Instead, the T Third Line will commence at its northern terminal, a subway station in Chinatown at Stockton/Washington, and then run underground below Stockton Street, continue underground below 4th Street before emerging at street level at 4th/Bryant, and continue at street level through the 4th/King intersection. At the southern leg of the 4th/King intersection, the T Third alignment will connect to its existing alignment, which traverses to the existing southern terminal at Bayshore/Sunnydale.

FTA Circular 4702.1B (Title VI Circular) requires that proposed changes to lines running parallel or connecting to the New Starts Project also be examined. Service changes to lines parallel or connecting to the T Third Street Line that would have the same implementation date as the Project are continuing to be refined and will be examined upon finalization.

TITLE VI SERVICE EQUITY ANALYSIS

As a federally funded agency, the SFMTA must comply with Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color or national origin in programs and activities receiving Federal financial assistance. Title VI Circular requires a transit agency's governing board to adopt a Title VI Program, and, as a part of the Program, the following policies related to fare and service changes: Major Service Change Policy, Disparate Impact Policy, and Disproportionate Burden Policy.

The SFMTA's Major Service Change Policy defines a major service change as a change in transit service that would be in effect for more than a 12-month period, and that would consist of any of the following criteria:

- *A schedule change (or series of changes) resulting in a system-wide change in annual revenue hours of five percent or more implemented at one time or over a rolling 24-month period;*
- *A schedule change on a route with 25 or more one-way trips per day resulting in:*
 - *Adding or eliminating a route;*
 - *A change in annual revenue hours on the route of 25 percent or more;*
 - *A change in the daily span of service on the route of three hours or more; or*
 - *A change in route-miles of 25 percent or more, where the route moves more than a quarter mile.*

Corridors served by multiple routes will be evaluated based on combined revenue hours, daily span of service, and/or route-miles.
- *The implementation of a New Start, Small Start, or other new fixed guideway capital project, regardless of whether the proposed changes to existing service meet any of the criteria for a service change described above.*

Specifically for New Starts projects, the Title VI Circular requires that a Title VI service equity analysis be conducted six months prior to the beginning of revenue operations, whether or not the proposed changes to existing service rise to the level of a “major service change,” as defined by the

transit provider. In response to this Title VI Circular requirement, the SFMTA has prepared an analysis comparing the current T Third Line service to the service to be implemented with the Project in order to determine whether the Project is expected to result in a disparate impact on communities of color or a disproportionate burden on low-income populations. FTA Circular 4702.1B requires that proposed changes to lines running parallel or connecting to the New Starts Project also be examined. Service changes to lines parallel or connecting to the T Third Street Line that would have the same implementation date as the Project are continuing to be refined and will be examined upon finalization.

The Title VI Circular also calls for a fare equity analysis for any fares that will change as a result of the capital project. As the Project does not include a fare change, no fare equity analysis is required.

Under the SFMTA's Disparate Impact Policy in its Title VI Program, service changes are considered to have a disparate impact on communities of color if:

- the changes meet the Agency's major service change criteria, and
- the proportion of people of color in the population impacted by the service changes is eight or more percentage points higher for service decreases (or lower for service increases) than the respective proportion in the citywide population.

Under the SFMTA's Disproportionate Burden Policy in its Title VI Program, service changes are considered to have a disproportionate burden on individuals living in low-income households if:

- the changes meet the Agency's major service change criteria, and
- the proportion of individuals living in low-income households in the population impacted by the service changes is eight or more percentage points higher for service decreases (or lower for service increases) than the respective proportion in the citywide population.

The Title VI analysis revealed the following:

- Among the population considered to be impacted by the T Third route segment elimination (a service decrease), the proportion of people of color and the proportion of individuals living in low-income households were found to not be eight or more percentage points higher than the respective proportions among the citywide population.
- Among the population considered to be impacted by the T Third route segment addition (a service increase), the proportion of people of color and the proportion of individuals living in low-income households were found to not be eight or more percentage points lower than the respective proportions among the citywide population.

In summary, the Title VI analysis found that the Project does not result in a disparate impact or disproportionate burden. See table below.

Summary of Findings for Service Equity Analysis

Service Change	Impacted Population ¹ (Within 0.25 Miles of a Stop)	People of Color		Living in Low-Income Households	
		% People of Color ¹	Difference from Citywide Proportion People of Color	% Low-income ¹	Difference from Citywide Proportion Low-Income
Service Decrease <i>T Third Route Segment Elimination</i>	55,949	59%	-1	25%	+5
Service Increase <i>T Third Route Segment Addition</i>	26,683	75%	+15	43%	+23
Citywide Population ¹		60%		20%	
Disparate Impact?			No		
Disproportionate Burden?					No

Notes: ¹ Data Source: U.S. Census Bureau 2016-2020 American Community Survey 5-year Estimates

STAKEHOLDER ENGAGEMENT

Pursuant to Title VI of the Civil Rights Act of 1964 and its implementing regulations, as well as state and local laws, the SFMTA takes responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of the SFMTA’s programs and activities for individuals, regardless of race, color or national origin, including level of English proficiency. Given the diversity of San Francisco and of Muni ridership, the SFMTA is particularly committed to disseminating information that is accessible to individuals who may have a limited ability to read, write or speak English.

The Project, including the T Third Line Fourth/Stockton alignment and the four new stations, has been in construction for several years. Throughout the Project, the SFMTA has employed an extensive multilingual campaign to engage stakeholders and solicit feedback. Multiple elements of the Project have been informed and influenced by community feedback as part of the environmental review phase, as well as during the design and construction phases.

Community outreach and participation occurred as part of the Project’s public scoping, locally preferred alternatives development, and environmental analysis. Volume I of the Central Subway Final Supplemental Environmental Impact Statement / Supplemental Environmental Impact Report (Final Central Subway SEIS/SEIR) includes a summary of public comments received during the 2005 Project scoping process, a list of over 100 community outreach presentations and briefings that were held, and an overall summary of the stakeholder engagement. Volume II of this document contains all public comments received on the Draft Supplemental Environmental Impact Statement/Supplemental Environmental Impact Report (Draft SEIS/SEIR) prepared for the Project and the responses to those comments.

The following excerpt from Volume I of the Final Central Subway SEIS/SEIR describes the overall community engagement process:

As noted in Section 4.2.5 and Chapter 11.0, an extensive community participation effort was undertaken to provide information to the public and solicit input during the development of the Project alternatives. This effort will continue through the Project implementation phase. Not only have over 100 presentations been made to neighborhood groups, community and business organizations, and individual stakeholders, but printed materials have been made available in Chinese and Spanish as well as English. The Central Subway telephone information line provides responses in English, Chinese, and Spanish.

Community meetings have been held in each of the neighborhood areas surrounding proposed stations and Project alternatives have been refined based on community input to ensure that community concerns are addressed. The breadth and depth of community outreach has ensured equal access to the process regardless of income level or ethnicity to ensure the Project is consistent with Environmental Justice objectives.

Once the environmental review documents were completed and approved, public outreach focused on design, early construction, utility relocation, construction impacts, and important Project milestones. Communications channels have included: multilingual public information materials, such as fliers, postcards, signage, brochures and newsletters; blast emails; a dedicated bilingual public information officer assigned to the Project; virtual and in-person community meetings with merchants and residents with simultaneous interpretation; engagement with community-based organizations; and, as needed bilingual street ambassadors deployed along the Project alignment to help disseminate critical Project information. The SFMTA also utilized multilingual media, both print and broadcast, to keep the community and other stakeholders informed of important Project milestones and construction impacts.

In addition, one of the key elements of the ongoing community engagement effort throughout the implementation of the Project has been the consistent meetings with the Central Subway Community Advisory Group (CAG). The SFMTA established a CAG for the Project early in the planning process to gather input on the identification and selection of design options for the Third Street Light Rail Project and to help select the options to carry forward for environmental review. The CAG consists of representatives from neighborhoods along the entire Third Street Light Rail Project alignment: Visitation Valley, Bayview/Hunters Point, Mission Bay/Potrero Hill, South of Market, Downtown, Union Square and Chinatown. The diverse membership brings to the table citywide, neighborhood, environmental, transportation, commuter, historical and planning interests. As the Project has progressed, the CAG has continued to provide opportunities to engage with the local community, and to receive input and feedback at key milestones.

ALTERNATIVES CONSIDERED

Alternatives for the alignment of the Central Subway Project, Phase 2 of the SFMTA's T Third Street Line Light Rail Transit Project, were analyzed as part of the development of the Central Subway SEIS/SEIR described in the Environmental Review section below.

FUNDING IMPACT

The Title VI Service Equity Analysis of the Project has no funding impact.

ENVIRONMENTAL REVIEW

The Central Subway SEIS/SEIR evaluated the environmental impacts of the Project. On August 7, 2008, the San Francisco Planning Commission certified the Final SEIR (Case No. 1996.281E). On August 19, 2008, the SFMTA Board of Directors approved Resolution 08-150, adopting Central Subway Project Alternative 3B as the Locally Preferred Alternative, the CEQA Findings, Statement of Overriding Considerations, and the Mitigation Monitoring and Reporting Plan.

In November 2008, the Federal Transit Administration issued a Record of Decision for the Central Subway Project, determining that the requirements of the National Environmental Policy Act had been met through the Final EIS document and process.

Approval of the Title VI Service Equity Analysis for the Project would not cause new significant impacts not identified in the Central Subway SEIS/SEIR or result in a substantial increase in the severity of previously identified significant impacts, and no new mitigation measures would be necessary to reduce significant impacts.

The Central Subway SEIS/SEIR is on file with the SFMTA Board of Directors, may be found in the records at <https://www.sfmta.com/reports/central-subway-final-seisseir> or at the Planning Department at 49 South Van Ness Avenue, Suite 1400, in San Francisco, and is incorporated herein by reference.

OTHER APPROVALS

The City Attorney's Office has reviewed this calendar item.

RECOMMENDATION

That the SFMTA Board approve the SFMTA's Title VI Service Equity Analysis of the Central Subway Project (Phase 2 of the T Third Street Line Light Rail Transit Project), required by the Federal Transit Administration for New Starts Projects, which found the Central Subway Project had no disparate impact on communities of color or disproportionate burden on low-income communities under Title VI of the Civil Rights Act of 1964.

SAN FRANCISCO
MUNICIPAL TRANSPORTATION AGENCY
BOARD OF DIRECTORS

RESOLUTION No. _____

WHEREAS, The Central Subway Project, Phase 2 of the SFMTA's T Third Street Line Light Rail Transit Project (Project), is currently expected to begin revenue operations in Fall 2022; and,

WHEREAS, The largest source of funding for the Central Subway Project is provided by the Federal Transit Administration's (FTA's) New Starts program; and,

WHEREAS, FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," requires that a Title VI service and fare equity analysis be conducted for New Starts projects six months prior to the beginning of revenue service operations, whether or not the proposed changes to existing service rise to the level of a "major service change," as defined by the transit provider; and,

WHEREAS, FTA Circular 4702.1B requires that proposed changes to lines running parallel or connecting to the New Starts Project also be examined and service changes to lines parallel or connecting to the T Third Street Line that would have the same implementation date as the Project are continuing to be refined and will be examined upon finalization; and,

WHEREAS, the Project does not include a fare change, and therefore, a fare equity analysis is not required; and,

WHEREAS, A previous Title VI service equity analysis of the Project was approved as part of SFMTA Board Resolution No. 180320-047 on March 20, 2018; and,

WHEREAS, An updated Title VI analysis was conducted in April 2022 in anticipation of the Project's planned start of revenue service in Fall 2022 and uses 2016-2020 American Community Survey 5-Year Estimates data, the most recently available U.S. Census data; and,

WHEREAS, The SFMTA analyzed the impacts of the Project on communities of color and customers from low-income households and found that the Project does not result in a disparate impact on communities of color or a disproportionate burden on low-income communities under Title VI of the Civil Rights Act of 1964; and,

WHEREAS, Throughout the Project, the SFMTA has employed an extensive multilingual campaign to engage stakeholders and solicit feedback, and multiple elements of the Project have been informed and influenced by community feedback as part of the environmental review phase, as well as during the design and construction phases; and,

WHEREAS, The Central Subway Final Supplemental Environmental Impact Statement / Supplemental Environmental Impact Report (Central Subway SEIS/SEIR) evaluated the environmental impacts of the Central Subway Project; and,

WHEREAS, On August 7, 2008, the San Francisco Planning Commission certified the Final SEIR (Case No. 1996.281E), and on August 19, 2008, the SFMTA Board of Directors approved Resolution 08-150, adopting Central Subway Project Alternative 3B as the Locally Preferred Alternative, the CEQA Findings, Statement of Overriding Considerations, and the Mitigation Monitoring and Reporting Plan; and,

WHEREAS, In November 2008, the Federal Transit Administration issued a Record of Decision for the Central Subway Project, determining that the requirements of the National Environmental Policy Act had been met through the Final EIS document and process; and,

WHEREAS, Approval of the Title VI Service Equity Analysis for the Project would not cause new significant impacts not identified in the Central Subway SEIS/SEIR or result in a substantial increase in the severity of previously identified significant impacts, and no new mitigation measures would be necessary to reduce significant impacts; and,

WHEREAS, The Central Subway SEIS/SEIR is on file with the SFMTA Board of Directors, may be found in the records at <https://www.sfmta.com/reports/central-subway-final-seisseir> or at the Planning Department at 49 South Van Ness Avenue, Suite 1400 in San Francisco, and is incorporated herein by reference; now, therefore, be it

RESOLVED, That the SFMTA Board has reviewed and considered the Central Subway SEIS/SEIR and record as a whole, and finds that the Central Subway SEIS/SEIR is adequate for the Board's use as the decision-making body for the Title VI-related action taken herein, and incorporates the CEQA findings by this reference as though set forth in this Resolution; and be it further

RESOLVED, That the SFMTA Board approves the SFMTA's Title VI Service Equity Analysis of the Central Subway Project (Phase 2 of the T Third Street Line Light Rail Transit Project), required by the Federal Transit Administration for New Starts Projects, which found the Central Subway Project had no disparate impact on communities of color or disproportionate burden on low-income communities under Title VI of the Civil Rights Act of 1964.

I certify that the foregoing resolution was adopted by the San Francisco Municipal Transportation Agency Board of Directors at its meeting of June 21, 2022.

Secretary to the Board of Directors
San Francisco Municipal Transportation Agency

Enclosure 2

**TITLE VI
SERVICE EQUITY
ANALYSIS**

Central Subway Project

April 2022

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I. Background

A. Title VI Overview

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." 42 U.S.C. Section 2000d.

Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients" (Title VI Circular), provides guidance to transit agencies serving large urbanized areas and requires that these agencies "evaluate, prior to implementation, any and all service changes that exceed the transit provider's major service change threshold, as well as all fare changes, to determine whether those changes will have a discriminatory impact based on race, color, or national origin" (Title VI Circular, Page IV-11).

The Central Subway Project (Project) is Phase 2 of the Third Street Light Rail Project. In 2008, the Federal Transit Administration (FTA) approved a Record of Decision (ROD) to finalize the environmental process under the National Environmental Policy Act (NEPA). This was a prelude to the Project receiving federal assistance (full funding grant agreement) pursuant to the New Starts process. 49 U.S. Code § 5309. As part of the NEPA review in 2008, Alternative 3B (Fourth Stockton Alignment) was chosen as the locally preferred alternative (LPA).

For New Starts projects, the Title VI Circular requires that a Title VI service equity analysis be conducted six months prior to the beginning of revenue operations, whether or not the proposed changes to existing service rise to the level of a "major service change," as defined by the transit provider. This Title VI analysis for the Project is included herein. The Title VI Circular requires that proposed changes to lines running parallel or connecting to the New Starts Project also be examined. Service changes to lines parallel or connecting to the T Third Street Line that would have the same implementation date as the Project are continuing to be refined and will be examined upon finalization.

A fare equity analysis is also required for any fares that will change as a result of the capital project. No fares will change due to the Project; therefore, a fare equity analysis is not required.

In response to the Title VI Circular requirement, the SFMTA has prepared an analysis comparing the current T Third Line service to the service to be implemented with the Project in order to determine whether the Project will result in a disparate impact on communities of color or a disproportionate burden on low-income populations.

The SFMTA is required to submit the final service equity analysis to the SFMTA Board of Directors for its consideration, awareness and approval and will provide a copy of the Board resolution to the FTA as documentation. This analysis will be forwarded to the SFMTA Board of Directors for review and public comment on June 21, 2022, responding to the reporting requirements contained in FTA Circular 4702.1B.

B. SFMTA and the Central Subway Project Title VI Analysis

The SFMTA, a department of the City and County of San Francisco, was established by voter proposition in 1999. One of the SFMTA’s primary responsibilities is operating the San Francisco Municipal Railway, known universally as “Muni.” Muni is the largest transit system in the Bay Area, and before the COVID-19 pandemic, served over 700,000 passenger boardings per day and over 220 million customers a year. The Muni fleet includes historic streetcars, renewable biodiesel and electric hybrid buses and electric trolley coaches, light rail vehicles, paratransit cabs and vans, and the world-famous cable cars. Muni provides one of the highest levels of service per capita. Prior to the pandemic, the service consisted of 63 bus routes, seven light rail lines, two historic streetcar lines, and three cable car lines. Muni also connects to other Bay Area public transit systems, such as BART, AC Transit, Golden Gate Transit and Ferries, SamTrans, and Caltrain.

This Title VI Analysis includes:

- SFMTA’s Board-approved Title VI-related policies and definitions, including the Agency’s Major Service Change, Disparate Impact and Disproportionate Burden Policies.
- The methodology used for this service equity analysis.
- A description of the T Third Street Fourth/Stockton alignment resulting from the Central Subway Project.
- The results of the service equity analysis.
- A description of the public outreach and engagement efforts to seek public comment on the Project.

II. SFMTA’s Title VI-related Policies, Definitions

On October 1, 2012, the FTA issued an updated Title VI Circular, which requires a transit agency’s governing board to adopt the following policies related to fare and service changes:

- Major Service Change Definition – establishes a definition for a major service change, which provides the basis for determining when a service equity analysis needs to be conducted.
- Disparate Impact and Disproportionate Burden Policies – establishes thresholds to determine when proposed major service changes or fare changes would adversely affect communities of color and/or low-income populations and when alternatives need to be considered or impacts mitigated.

In response to the Title VI Circular, the SFMTA developed Major Service Change, Disparate Impact and Disproportionate Burden Policies, which were approved by the SFMTA Board of Directors on August 20, 2013, after an extensive multilingual public outreach process. Outreach included two public workshops, five presentations to the SFMTA Board and committees, and outreach to approximately 30 community-based organizations and transportation advocates with broad perspective among communities of color and low-income communities.

The following definitions and policies were used to conduct this Title VI service equity analysis: People and Communities of Color/Minority Populations, Low-income Populations, Major Service Change Policy, Disparate Impact Policy, Disproportionate Burden Policy, and Adverse Effect.

C. People and Communities of Color / Minority Populations

The Title VI Circular includes the following race and ethnicity identities in its definition for those who are considered “minority persons” and members of “minority populations”: American Indian and Alaska Native, Asian, Black or African American, Hispanic or Latino, or Native Hawaiian or other Pacific Islander. For the purpose of this Title VI analysis, the SFMTA considers individuals to be a person of color if they self-identify as any race/ethnicity other than White, Not Hispanic or Latino. Individuals who self-identify as Multi-Racial including White, are also considered to be a person of color.

D. Low-income Populations

The SFMTA defines low-income individuals as those whose total household income is below 200% of the federal poverty level per household size. This definition of low-income households matches SFMTA’s criteria for Lifeline Muni passes for low-income households in San Francisco. To be consistent with the use of 2020 American Community Survey data for the service equity analysis, Table 1 shows the 2020 household incomes that meet the 200% Federal poverty level threshold for different household sizes.

Table 1: 2020 Poverty Designations by Household Size

Household Size	Poverty Guideline	200% of Poverty Guideline
1	\$12,760	\$25,520
2	\$17,240	\$34,480
3	\$21,720	\$43,440
4	\$26,200	\$52,400
5	\$30,680	\$61,360
6	\$35,160	\$70,320
7+ add for each additional household member	+\$4,480	+\$8,960

E. Major Service Change Policy

The SFMTA has developed a policy that defines a Major Service Change as a change in transit service that would be in effect for more than a 12-month period, and that would consist of any of the following criteria:

- *A schedule change (or series of changes) resulting in a system-wide change in annual revenue hours of five percent or more implemented at one time or over a rolling 24-month period;*
- *A schedule change on a route with 25 or more one-way trips per day resulting in:

 - *Adding or eliminating a route;*
 - *A change in annual revenue hours on the route of 25 percent or more;*
 - *A change in the daily span of service on the route of three hours or more; or*
 - *A change in route-miles of 25 percent or more, where the route moves more than a quarter mile.**

- Corridors served by multiple routes will be evaluated based on combined revenue hours, daily span of service, and/or route-miles.*
- *The implementation of a New Start, Small Start, or other new fixed guideway capital project, regardless of whether the proposed changes to existing service meet any of the criteria for a service change described above.*

F. Disparate Impact Policy

The SFMTA's Disparate Impact Policy is:

Disparate Impact Policy determines the point ("threshold") when adverse effects of fare or service changes are borne disparately by minority populations. Under this policy, a fare change, or package of changes, or major service change, or package of changes, will be deemed to have a disparate impact on minority populations if the difference between the percentage of the minority population impacted by the changes and the percentage of the minority population system-wide is eight percentage points or more. Packages of major service changes across multiple routes will be evaluated cumulatively and packages of fare increases across multiple fare instruments will be evaluated cumulatively.

G. Disproportionate Burden Policy

The SFMTA's Disproportionate Burden Policy is:

Disproportionate Burden Policy determines the point when adverse effects of fare or service changes are borne disproportionately by low-income populations. Under this policy, a fare change, or package of changes, or major service change, or package of changes, will be deemed to have a disproportionate burden on low-income populations if the difference between the percentage of the low-income population impacted by the changes and the percentage of the low-income population system-wide is eight percentage points or more. Packages of major service changes across multiple routes will be evaluated cumulatively and packages of fare increases across multiple fare instruments will be evaluated cumulatively.

H. Adverse Effect

In addition to defining policies relating to Major Service Changes, Disparate Impact, and Disproportionate Burden, the SFMTA also must define when an adverse effect may be found. According to the Title VI Circular, "an adverse effect is measured by the change between the existing and proposed service levels that would be deemed significant." For this analysis, an adverse effect may be deemed significant if it is in accordance with the SFMTA's Major Service Change definition and it negatively impacts communities of color and/or low-income populations.

An adverse effect may be found if any one of the following occur:

- *A system-wide change (or series of changes) in annual revenue hours of five percent or more proposed at one time or over a rolling 24-month period;*
- *A route is added or eliminated;*
- *Annual revenue hours on a route are changed by 25 percent or more;*

- *The daily span of service on the route is changed three hours or more; or*
- *Route-miles are changed 25 percent or more, where the route moves more than a quarter mile.*

And

- *The proposed changes negatively impact minority and low-income populations.*

Corridors served by multiple routes will be evaluated based on combined revenue hours, daily span of service, and/or route-miles.

It should be noted that Title VI also requires that positive changes, such as fare reductions and major service improvements, be evaluated for their effect on communities of color and low-income communities. The SFMTA separately evaluates positive impact proposals and negative impact proposals.

III. Methodology for Service Equity Analysis

The Title VI Circular requires that a service equity analysis be conducted for service changes that meet the criteria in the transit agency's Major Service Change Policy.

Specific to New Starts Projects, the Title VI Circular requires that a service equity analysis be conducted six months prior to the beginning of revenue operations, whether or not the proposed changes to existing service as a result of the project rise to the level of a "major service change," as defined by the transit provider. This requirement, which guides the service equity analysis included herein, reads as follows on page IV-21 of the Title VI Circular:

Transit providers that have implemented or will implement a New Start, Small Start, or other new fixed guideway capital project shall conduct a service and fare equity analysis. The service and fare equity analysis will be conducted six months prior to the beginning of revenue operations, whether or not the proposed changes to existing service rise to the level of 'major service change' as defined by the transit provider. All proposed changes to parallel or connecting service will be examined. If the entity that builds the project is different from the transit provider that will operate the project, the transit provider operating the project shall conduct the analysis. The service equity analysis shall include a comparative analysis of service levels pre-and post- the New Starts/Small Starts/new fixed guideway capital project. The analysis shall be depicted in tabular format and shall determine whether the service changes proposed (including both reductions and increases) due to the capital project will result in a disparate impact on minority populations. The transit provider shall also conduct a fare equity analysis for any and all fares that will change as a result of the capital project.

In response to this requirement, the SFMTA has prepared an analysis comparing the current service to the service to be implemented with the Project in order to determine whether the Project is expected to result in a disparate impact on communities of color or a disproportionate burden on low-income populations. The Project's T Third Street Line Fourth/Stockton Alignment is described in Section IV below.

As mentioned above, since the SFMTA is not changing fares related to the opening of the Project, a Title VI fare equity analysis is not required.

The SFMTA typically relies on customer on-board survey data for service change analyses by using the route's ridership demographics. However, since the Project introduces a new route segment with no existing ridership data for comparison, U.S. Census data, specifically, the 2016-2020 American Community Survey 5-Year Estimates (2020 ACS) data (the most recently available Census data), are used to determine the population that is impacted by the change. The impacted population is considered to be the population that lives within the service area of the route segments experiencing a change. The service area for each route segment is defined to be the areas within a quarter mile of the stops along the impacted route segment.

Race/ethnicity and household income data from the 2020 ACS at the census block group level are used in conjunction with the quarter-mile buffer from each of the route's impacted stops. For every block group that is at least partly within the quarter-mile buffer, the percentage of the block group that is within the quarter-mile buffer is applied to the population and demographic data for the entire block group. The result is considered the number of individuals within the block group who are served by the route and thus comprise the impacted population for the major service change occurring along that route. The identified proportions for the impacted population are then compared to the corresponding proportions for the overall population of San Francisco. This comparison is used to determine if the service changes are found to result in a disparate impact on San Francisco's communities of color or a disproportionate burden on San Francisco's low-income population.

In the 2020 ACS, 60% of San Francisco residents self-identified as a person of color and 20% of residents reported that they live in a low-income household (a household living at less than 200% of the Federal poverty level).

Based on the SFMTA's Disparate Impact Policy and Disproportionate Burden Policy, the comparisons of the proportions for the impacted population to San Francisco's overall population of San Francisco are then used to determine if each category of major service changes is found to have an impact.

A disparate impact is found for:

- Service decreases - if people of color comprise a proportion of the impacted population that is eight or more percentage points higher than the proportion of the citywide population
- Service increases - if people of color comprise a proportion of the impacted population that is eight or more percentage points lower than the proportion of the citywide population

A disproportionate burden is found for:

- Service decreases - if those in a low-income household comprise a proportion of the impacted population that is eight or more percentage points higher than the proportion of the citywide population
- Service increases - if those in a low-income household comprise a proportion of the impacted population that is eight or more percentage points lower than the proportion of the citywide population

IV. T Third Street Fourth/Stockton Alignment Resulting from Central Subway Project

As mentioned above, the Central Subway Project is Phase 2 of the Third Street Light Rail Transit Project. Phase 1 of the Project delivered a 5.4-mile light rail line, the Muni Metro T Third, from the San Mateo County border to the Caltrain station at Fourth and King Streets. This alignment opened in April 2007.

Currently, the T Third Line is interlined with the K Ingleside Line as the KT Ingleside/Third Line. In the southbound direction, the T Third Line travels from West Portal to the Embarcadero, Mission Bay, Dogpatch, Third Street, and the Bayview District before terminating at Bayshore/Sunnydale in Visitacion Valley. In the northbound direction, the T Third Street travels from Bayshore/Sunnydale and terminates at the Embarcadero. There it becomes the K Ingleside Line, continues in the Market Street subway to West Portal, and terminates at Balboa Park Station.

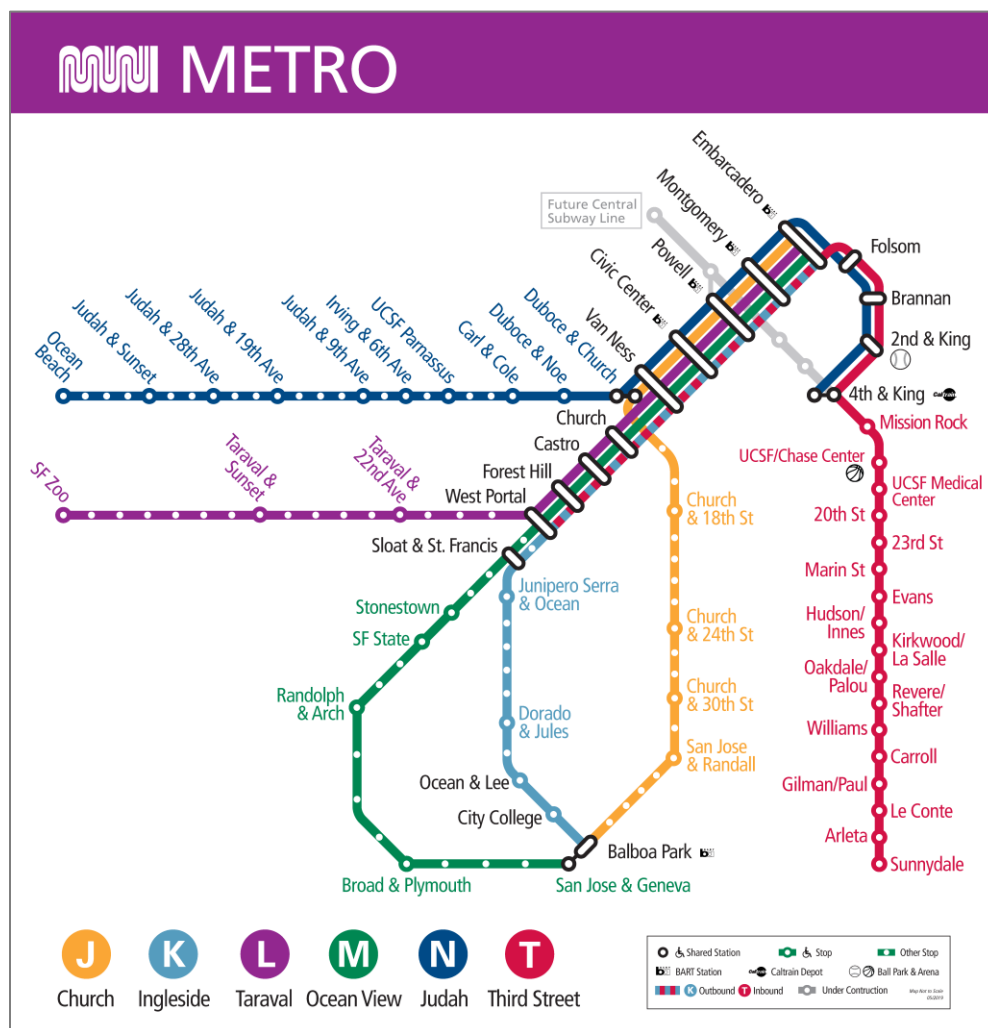
When the Project's T Third Line Fourth/Stockton Alignment opens for revenue service – currently planned for Fall 2022 – the T Third Street will no longer be interlined with the K Ingleside Line. Instead, the T Third Line will be realigned to commence at its northern terminal, a subway station in Chinatown at Stockton/Washington, and then run underground below Stockton Street, continue underground below 4th Street before emerging at street level at 4th/Bryant, and continue at street level through the 4th/King intersection.¹ At the southern leg of the 4th/King intersection, the T Third alignment will connect to its existing alignment, which traverses to the existing southern terminal at Bayshore/Sunnydale. There will also be four new stations along the new 1.7-mile route segment: a street level station at Fourth and Brannan Streets and three subway stations at Yerba Buena/Moscone, Union Square/Market Street, and Chinatown/Rose Pak.

Service changes to lines parallel or connecting to the T Third Street Line that would have the same implementation date as the Project are continuing to be refined and will be examined upon finalization.

Figure 1 shows the future Central Subway alignment with the Muni Metro system map as of early 2020, prior to the COVID-19 pandemic. Figure 2 is a more detailed map of the Central Subway Project area that shows the new T Third Line alignment and the four new stations (three subway and one surface).

¹ This is the LPA in the Final EIS/EIR (Alternative 3B) discussed above.

Figure 1: Muni Metro Map as of Early 2020 & Future T Third Street Alignment



- Notes: 1. This map shows the early 2020 (prior to the COVID-19 pandemic) Muni Metro lines.
 2. The future T Third alignment is shown in grey and labeled as "Future Central Subway Line".

Figure 2: Central Subway Project Map



Note: The Central Subway Project is Phase 2 of the T Third Street Line Light Rail Transit Project.

V. Service Equity Analysis

As described above, specifically for New Starts Projects, the Title VI Circular requires that a service equity analysis be conducted six months prior to the beginning of revenue operations, whether or not the proposed changes to existing service rise to the level of a “major service change,” as defined by the transit provider. In response to this requirement, this analysis aims to determine whether the following elements of the Project’s T Third Street Line Fourth/Stockton Alignment are expected to result in a disparate impact on communities of color or a disproportionate burden on low-income populations:

- A. Route Segment Elimination (Service Decrease)
- B. Route Segment Addition (Service Increase)

A. Route Segment Elimination (Service Decrease)

The T Third Street Fourth/Stockton alignment resulting from the Project, and the service changes to parallel and connecting lines, are described above. The current segment of the T Third Line that will be eliminated by the Project is the segment from West Portal Station to the Caltrain Station at the 4th/King intersection.

This route segment elimination and the populations considered to be impacted by this change are summarized in Table 2 and are shown in the maps in Figure 3 and Figure 4. Figure 3 also shows the Census Block groups where people of color make up a larger proportion than in the city's overall population. Figure 4 also shows the Census Block groups where people living in low-income households make up a larger proportion than in the city's overall population.

People of color make up 59% of the impacted population. Since this proportion is not eight or more percentage points higher than the proportion of the citywide population of people of color (60%), the route segment elimination does not result in a disparate impact.

People living in low-income households make up 25% of the impacted population. Since this proportion is not eight or more percentage points higher than the proportion of the citywide population living in low-income households (20%), the route segment elimination does not result in a disproportionate burden.

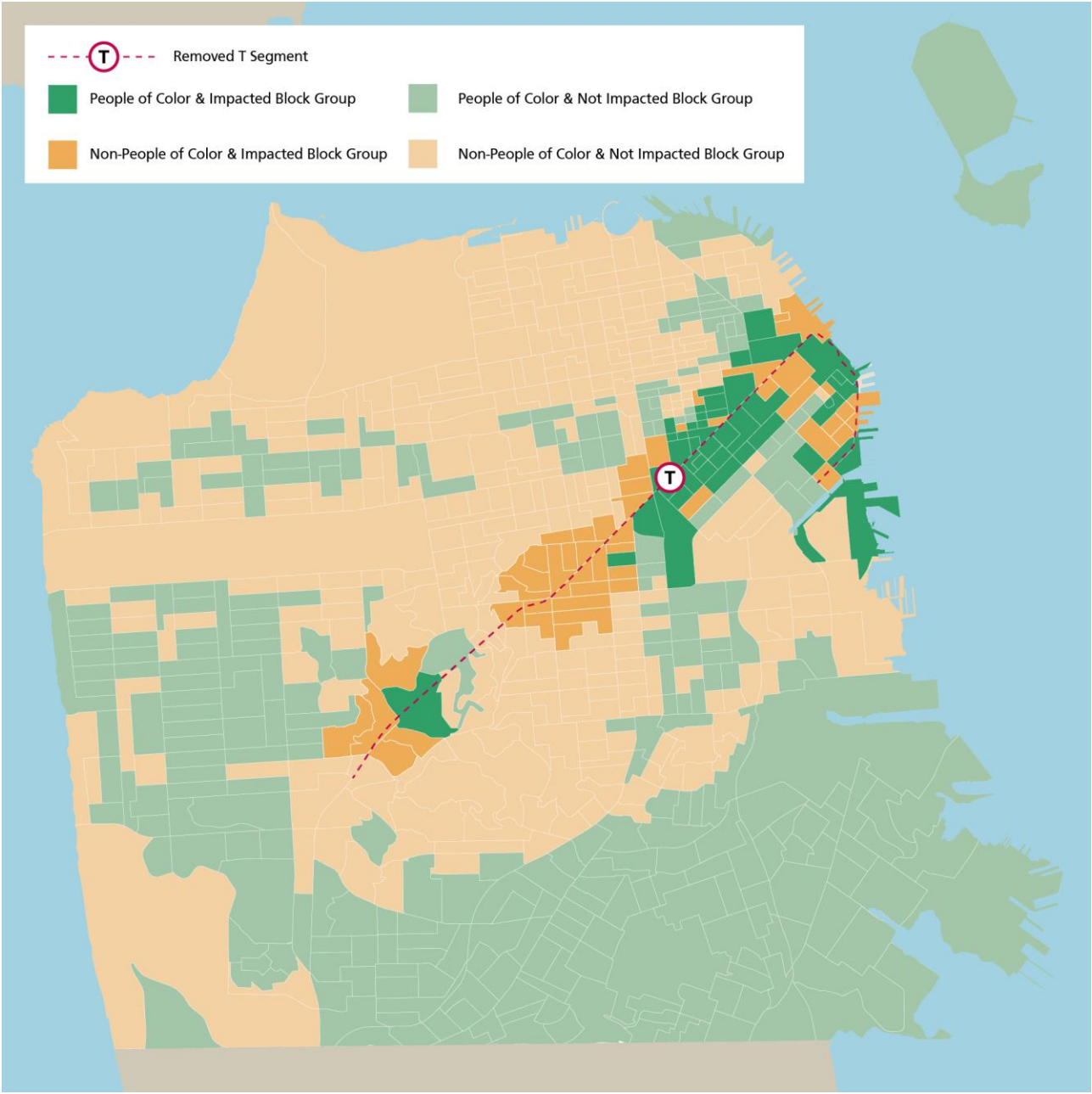
Table 2: Route Segment Elimination Summary

Route		Route-Miles % Change ²	Impacted Population (Within 0.25 Miles of a Stop)	% People of Color ¹	% Low-income ¹
T	Third Street Removed Segment - (West Portal Station to 4th/King Station)	-45%	55,949	59%	25%
Total Impacted Population (within 0.25 Miles) ¹			55,949	59%	25%
Citywide Population ¹				60%	20%
Difference in Percentage Points				-1	+5
Disparate Impact? (Difference of 8 or more percentage points <u>higher</u> for service <u>decreases</u> ?)				No	
Disproportionate Burden? (Difference of 8 or more percentage points <u>higher</u> for service <u>decreases</u> ?)					No

Notes: ¹ Data Source: U.S. Census Bureau 2016-2020 ACS 5-year Estimates

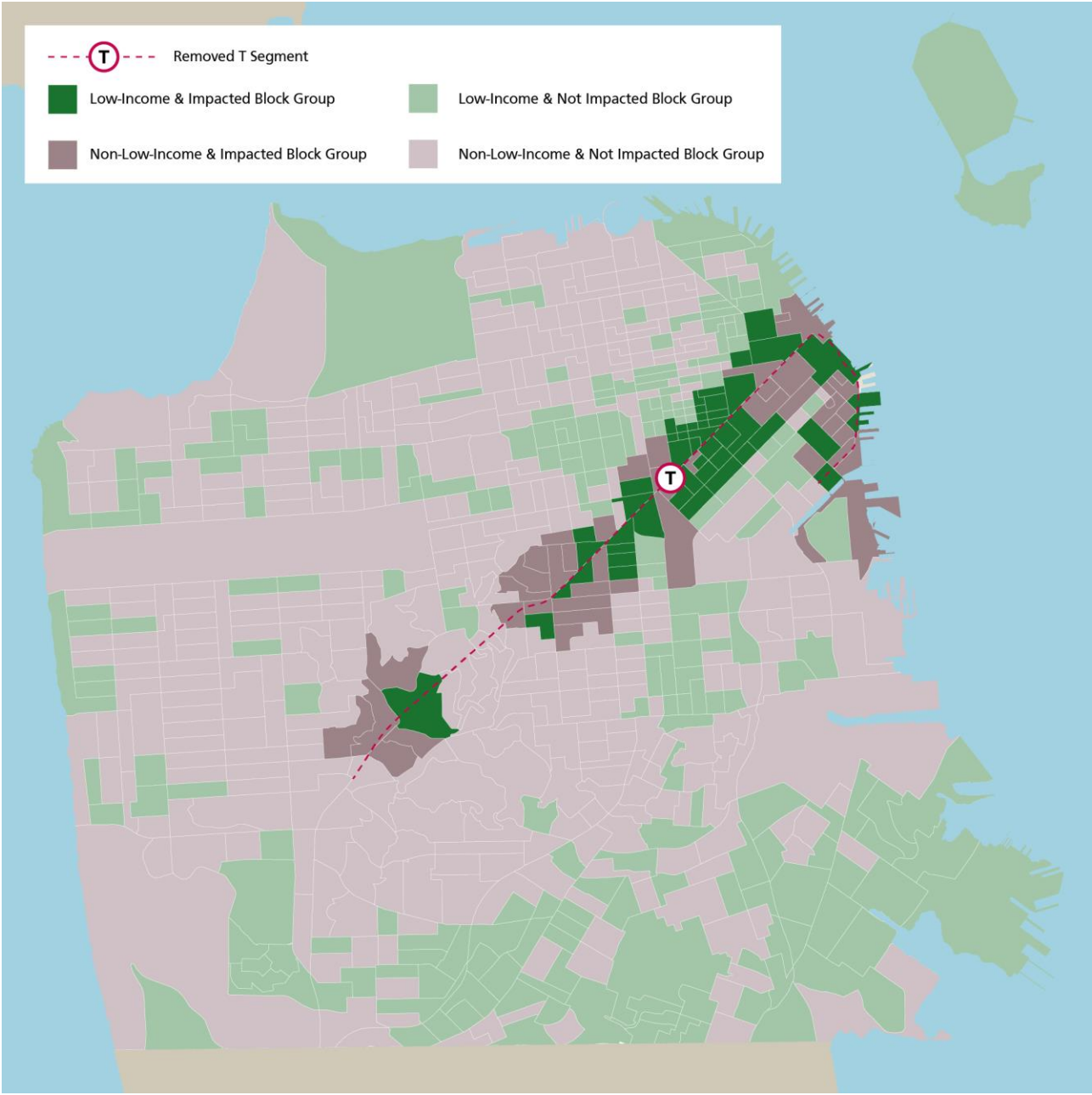
² As described above, specifically for New Starts Projects, the Title VI Circular requires that a Title VI service equity analysis be conducted six months prior to the beginning of revenue operations, whether or not the proposed changes to existing service rise to the level of a "major service change," as defined by the transit provider. The route miles percent change is therefore provided as a reference only.

Figure 3: Route Segment Elimination – Analysis of Impact on People of Color



- Notes:
- **People of Color Block Group:** Census Block Group where people of color make up an equal or greater proportion than in the city’s overall population (60%)
 - **Impacted Block Group:** Census Block Group where at least some residents live within the service area (0.25 miles) of an impacted transit stop

Figure 4: Route Segment Elimination - Analysis of Impact on Low-income Population



- Notes:
- **Low-Income Block Group:** Census Block Group where those living in low-income households make up an equal or greater proportion than in the city’s overall population (20%)
 - **Impacted Block Group:** Census Block Group where at least some residents live within the service area (0.25 miles) of an impacted transit stop

B. Route Segment Addition (Service Increase)

As described above, when the T Third Street Line is re-routed to serve the Central Subway, it will run from 4th Street and King Street to the new Chinatown/Rose Pak Station. This is the segment considered to be the added T Third Street route segment.

This route segment addition and the populations considered to be impacted by this change are summarized in Table 3 and are shown in the maps in Figure 5 and Figure 6. Figure 5 also shows the Census Block groups where people of color make up a larger proportion than in the city's overall population. Figure 6 also shows the Census Block groups where people living in low-income households make up a larger proportion than in the city's overall population.

People of color make up 75% of the impacted population. Since this proportion is not eight or more percentage points lower than the proportion of the citywide population of people of color (60%), the route segment addition does not result in a disparate impact.

People living in low-income households make up 43% of the impacted population. Since this proportion is not eight or more percentage points lower than the proportion of the citywide population living in low-income households (20%), the route segment addition does not result in a disproportionate burden.

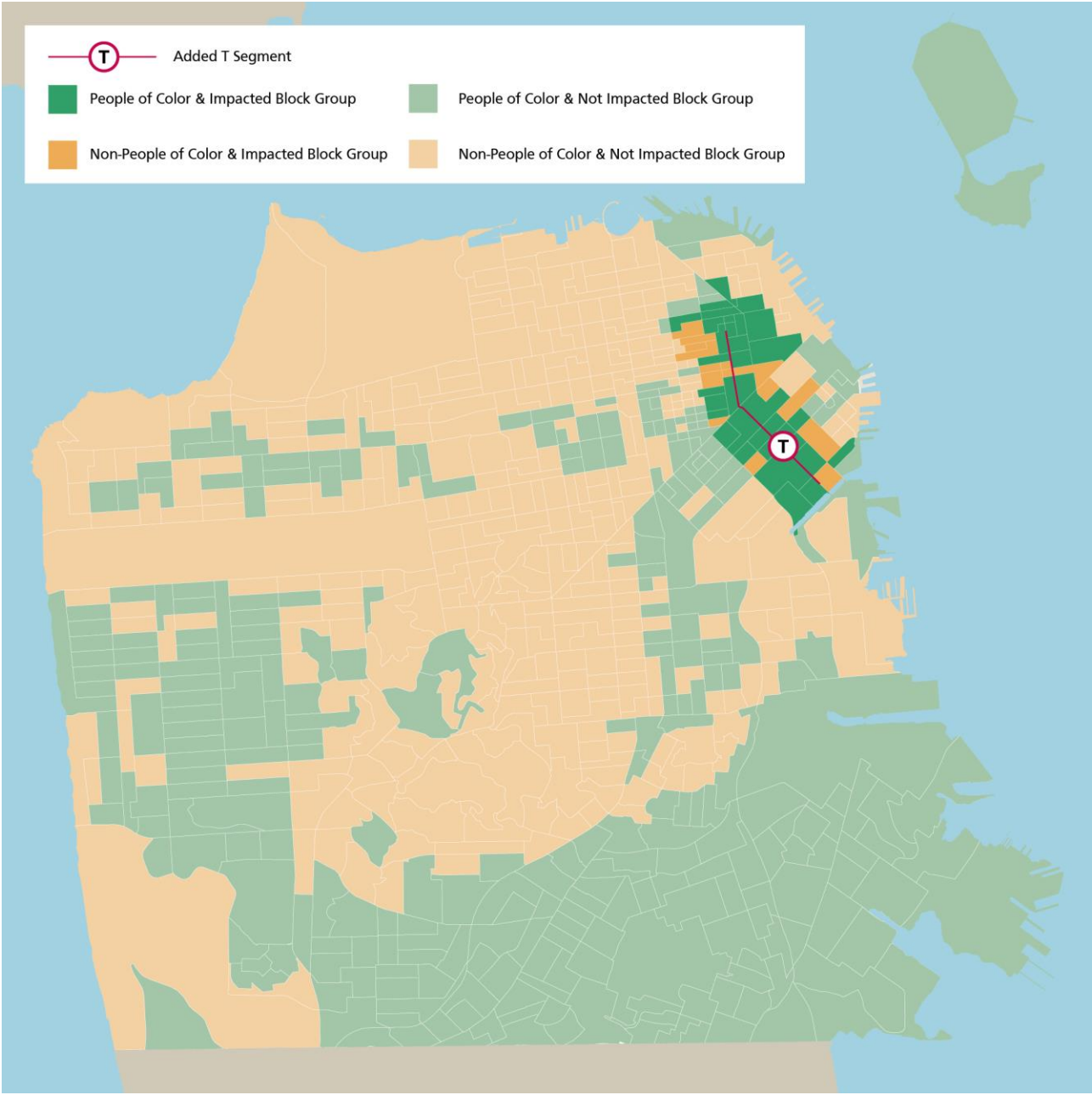
Table 3: Route Segment Addition Summary

Route		Route-Miles % Change	Impacted Population (Within 0.25 Miles of a Stop)	% People of Color ¹	% Low-income ¹
T	Third Street Added Segment (Chinatown/Rose Pak Station to 4th/King Station)	²	26,683	75%	43%
Total Impacted Population (within 0.25 Miles) ^{1,3}			26,683	75%	43%
Citywide Population ¹				60%	20%
Difference in Percentage Points				+15	+23
Disparate Impact? (Difference of 8 or more percentage points <u>lower</u> for service <u>increases</u> ?)				No	
Disproportionate Burden? (Difference of 8 or more percentage points <u>lower</u> for service <u>increases</u> ?)					No

Notes: ¹ Data Source: U.S. Census Bureau 2016-2020 ACS 5-year Estimates

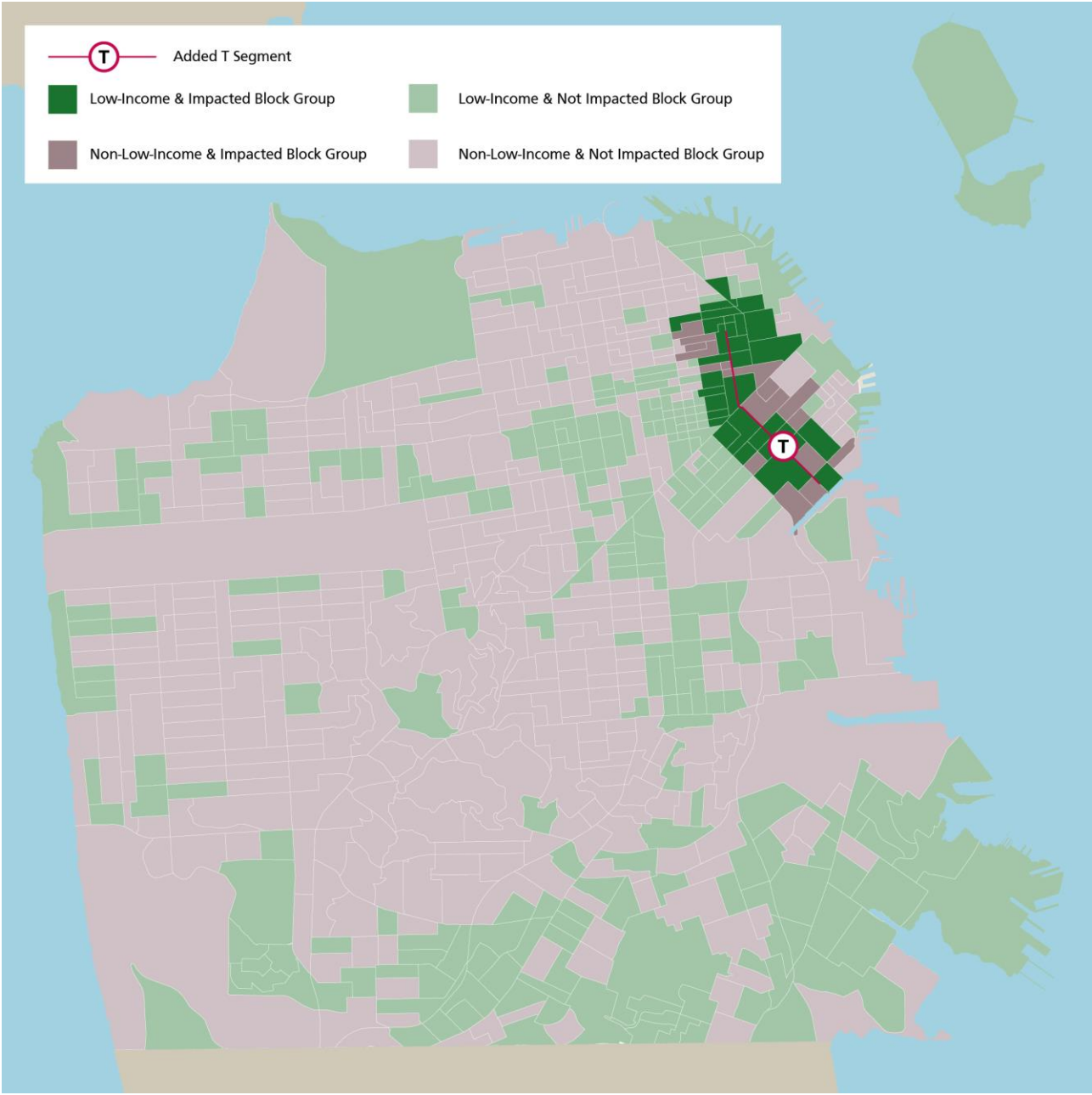
² For this route there is a segment suspension in addition to a segment addition. The cumulative percent change in route-miles is negative (noting a service decrease) and is thus shown with the route segment suspensions. See Table 2 for the cumulative percent change. Note that the route miles percent change is provided as a reference only since specifically for New Starts Projects the Title VI Circular requires that a service equity analysis be conducted six months prior to the beginning of revenue operations, whether or not the proposed changes to existing service rise to the level of a "major service change."

Figure 5: Route Segment Addition – Analysis of Impact on People of Color



- Notes:
- **People of Color Block Group:** Census Block Group where people of color make up an equal or greater proportion than in the city’s overall population (60%)
 - **Impacted Block Group:** Census Block Group where at least some residents live within the service area (0.25 miles) of an impacted transit stop

Figure 6: Route Segment Addition – Analysis of Impact on Low-income Population



- Notes:
- **Low-Income Block Group:** Census Block Group where those living in low-income households make up an equal or greater proportion than in the city’s overall population (20%)
 - **Impacted Block Group:** Census Block Group where at least some residents live within the service area (0.25 miles) of an impacted transit stop

C. Summary Analysis and Findings

Among the population considered to be impacted by the T Third route segment elimination (a service decrease), the proportion of people of color and the proportion of individuals living in low-income households were found not to be eight or more percentage points higher than the respective proportions among the citywide population.

Among the population considered to be impacted by the T Third route segment addition (a service increase), the proportion of people of color and the proportion of individuals living in low-income households were found not to be eight or more percentage points lower than the respective proportions among the citywide population.

These results indicate that no disparate impact or disproportionate burden was found. These findings are summarized in Table 4.

Table 4: Summary of Findings for Service Equity Analysis

Service Change	Impacted Population ¹ (Within 0.25 Miles of a Stop)	People of Color		Living in Low-Income Households	
		% People of Color ¹	Difference from Citywide Proportion People of Color	% Low-income ¹	Difference from Citywide Proportion Low-Income
Service Decrease <i>T Third Street Route Segment Elimination</i>	55,949	59%	-1	25%	+5
Service Increase <i>T Third Street Route Segment Addition</i>	26,683	75%	+15	43%	+23
Citywide Population ¹		60%		20%	
Disparate Impact?			No		
Disproportionate Burden?					No

Notes: ¹ Data Source: U.S. Census Bureau 2016-2020 ACS 5-year Estimates

VI. Outreach Summary

Pursuant to Title VI of the Civil Rights Act of 1964 and its implementing regulations, as well as state and local laws, the SFMTA takes responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of the SFMTA's programs and activities for individuals, regardless of race, color or national origin, including level of English proficiency. Given the diversity of San Francisco and of Muni ridership, the SFMTA is particularly committed to disseminating information that is accessible to individuals who may have a limited ability to read, write or speak English.

The Project, including the T Third Street Line Fourth/Stockton alignment and the four new stations, has been in construction for several years. Throughout the Project, the SFMTA has employed an extensive multilingual campaign to engage stakeholders and solicit feedback. Multiple elements of

the Project have been informed and influenced by community feedback as part of the environmental review phase, as well as during the design and construction phases.

Community outreach and participation occurred as part of the Project's public scoping, locally preferred alternatives development, and environmental analysis. Volume I of the Central Subway Final Supplemental Environmental Impact Statement / Supplemental Environmental Impact Report (Final Central Subway SEIS/SEIR) includes a summary of public comments received during the 2005 Project scoping process, a list of over 100 community outreach presentations and briefings that were held, and an overall summary of the stakeholder engagement. Volume II of this document contains all public comments received on the Draft Supplemental Environmental Impact Statement/Supplemental Environmental Impact Report (Draft SEIS/SEIR) prepared for the Project and the responses to those comments.

The following excerpt from Volume I of the Final Central Subway SEIS/SEIR describes the overall community engagement process:

As noted in Section 4.2.5 and Chapter 11.0, an extensive community participation effort was undertaken to provide information to the public and solicit input during the development of the Project alternatives. This effort will continue through the Project implementation phase. Not only have over 100 presentations been made to neighborhood groups, community and business organizations, and individual stakeholders, but printed materials have been made available in Chinese and Spanish as well as English. The Central Subway telephone information line provides responses in English, Chinese, and Spanish.

Community meetings have been held in each of the neighborhood areas surrounding proposed stations and Project alternatives have been refined based on community input to ensure that community concerns are addressed. The breadth and depth of community outreach has ensured equal access to the process regardless of income level or ethnicity to ensure the Project is consistent with Environmental Justice objectives.

Once the environmental review documents were completed and approved, public outreach focused on design, early construction, utility relocation, construction impacts, and important Project milestones. Communications channels have included: multilingual public information materials, such as fliers, postcards, signage, brochures and newsletters; blast emails; a dedicated bilingual public information officer assigned to the Project; virtual and in-person community meetings with merchants and residents with simultaneous interpretation; engagement with community-based organizations; and, as needed bilingual street ambassadors deployed along the Project alignment to help disseminate critical Project information. The SFMTA also utilized multilingual media, both print and broadcast, to keep the community and other stakeholders informed of important Project milestones and construction impacts.

In addition, one of the key elements of the ongoing community engagement effort throughout the implementation of the Project has been the consistent meetings with the Central Subway Community Advisory Group (CAG). The SFMTA established a CAG for the Project early in the planning process to gather input on the identification and selection of design options for the Third

Street Light Rail Project and to help select the options to carry forward for environmental review. The CAG consists of representatives from neighborhoods along the entire Third Street Light Rail Project alignment: Visitation Valley, Bayview/Hunters Point, Mission Bay/Potrero Hill, South of Market, Downtown, Union Square and Chinatown. The diverse membership brings to the table citywide, neighborhood, environmental, transportation, commuter, historical and planning interests. As the Project has progressed, the CAG has continued to provide opportunities to engage with the local community, and to receive input and feedback at key milestones.

VII. Summary

Based on the Title VI Service Equity Analysis conducted, the T Third Street Line Fourth/Stockton Alignment resulting from the Central Subway Project and was not found to disparately impact communities of color or disproportionately burden low-income populations.