



# Title VI Analysis

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## Route 910

Prepared by the Metropolitan Transit System  
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## Executive Summary

The San Diego Metropolitan Transit System (MTS) is proposing to make Route 910 permanent. Route 910 is an overnight express bus service that operates between the San Ysidro Transit Center (at the U.S.-Mexico border) and Santa Fe Depot in downtown San Diego. It provides limited-stop service for late-night workers and travelers, running approximately every 30 minutes from 12:30 a.m. to 5:00 a.m. Route 910 mirrors the UC San Diego Blue Line during the overnight hours, when the Trolley cannot operate due to freight train operations.

Since Route 910 was approved as a pilot project only, converting it to a permanent route is considered a major service change under MTS Policy 42.5B, and as a result, the FTA requires the execution of this Title VI analysis (FTA C 4702.1B). The Title VI analysis found no disparate impacts or disproportionate burdens to minority or low-income populations.

## Title VI

Title VI is a federal statute and provides that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. The purpose of this analysis is to ensure that MTS is in compliance with those Title VI requirements. MTS has followed the Federal Transit Administration (FTA) guidelines, published in FTA Circular 4702.1B on October 1, 2012.

The critical elements of this analysis involve a determination of whether or not disparate impacts to minority populations or disproportionate burdens to low-income populations would result from the change. As defined in MTS Policy 42:

*A disparate impact is found when there is a difference in adverse effects between minority and non-minority populations such that: the adversely affected population is 10 percent or greater minority than the total MTS service area average; or, the benefitting population is 10 percent or more non-minority than the total MTS service area average.*

*A disproportionate burden is found when there is a difference in adverse effects between low-income and non-low-income populations such that: the adversely affected population is 10 percent or more "low-income" than the total MTS service area average; or, the benefitting population is 10 percent or greater "non-low-income" by percentage of total population than the total MTS service area average.*

The FTA guidelines allow transit agencies to use either ridership or population as a basis to determine disparate impacts and disproportionate burdens. Whichever basis is selected should be used throughout the analysis. MTS has selected population as the basis to ensure consistency with past analyses.

The analysis compares the population in Census block groups affected by the proposed change (defined as within 1/4 mile of an affected route) with the population in the service area. The data source is the 2019-2023 5-year estimates from the American Community Survey.

The definitions of disparate impact and disproportionate burden included in MTS Policy 42 (see above) are used in this analysis. This analysis uses the definition of low-income persons included in FTA Circular 4702.1B. The Circular encourages recipients to use a locally-developed threshold for low-income persons that are "at least as inclusive as the Department of Health and Human Services (HHS) poverty guidelines." This analysis defines low-income persons as individuals whose household income is at or below 200 percent of the poverty level as defined by the United States Census Bureau (and is consistent with SANDAG methodology).

The formats provided in Tables 1 and 2 in Appendix K of FTA Circular 4702.1B are used to present the results of the analysis, as recommended by the FTA.

## Route 910 Title VI

### *Qualification as Major Service Change*

The definition of a major service change, as used within MTS Policy 42, was developed with public input as part of a public engagement process during June 2013 when MTS held a public hearing to solicit feedback from stakeholders. Policy 42 was updated in 2016. According to the policy, MTS will conduct a Title VI analysis on any of the following changes before a final implementation decision is made:

- A change that is greater than 25 percent of a route's weekly in-service miles or hours.
- An increase or reduction in the average weekly span-of service of more than 25 percent.
- The implementation of a new route or the discontinuation of an existing route.
- A routing change that affects more than 25 percent of a route's Directional Route Miles and more than 25 percent of the route's bus stops.

Route 910 was created to mirror the UC San Diego Blue Line Trolley during overnight hours, when the Trolley cannot operate due to freight operations. MTS received funding via state Senate Bill 125 grants to allow the launch of the pilot route in January 2025. Because this change will implement a new permanent service, it qualifies under MTS Policy 42 as a major service change.

### *Definition of Low-income and Minority Groups*

As mentioned above, FTA Circular 4702.1B encourages recipients to use a locally developed threshold for low-income person that is “at least as inclusive as the HHS poverty guidelines.” In coordination with SANDAG, MTS defines a low-income person as an individual whose household income is at or below 200 percent of the poverty level as defined by the United States Census Bureau. The FTA defines minority persons as the following: American Indian and Alaska Native, Asian, African American, Hispanic or Latino, and Native Hawaiian or other Pacific Islander.

### *Disparate Impact and Disproportionate Burden to Minority and Low-Income Populations*

This analysis considers the percentage of minority and low-income persons in each census block group that the route serves. MTS Policy 42.6b uses the phrase, “disparate impact,” when speaking of minorities, and the phrase, “disproportionate burden,” when speaking of low-income impacts. This report uses these phrases to differentiate the two. Both are defined as follows:

A **disparate impact** is found when there is a difference in adverse effects between minority and non-minority populations such that: the adversely affected population is 10 percent or greater minority by percentage of total population than the total MTS service area average; or, the benefiting population is 10 percent or more non-minority than the total MTS service area average. *For example, if the total MTS service area average is 55% minority, then a proposed service change that adversely affects a population that is 65% minority or greater would be defined as a disparate impact.* If MTS chooses to implement a proposed major service change despite a finding of a disparate impact, MTS may only do so if there is a substantial justification for the change, and there are no alternatives that would have a less disparate impact and still accomplish the goals of the change (MTS Policy 42.6b).

A **disproportionate burden** is found when there is a difference in adverse effects between low-income and non-low-income populations such that: the adversely affected population is 10 percent or more “low-income” than the total MTS service area average; or, the benefitting population is 10 percent or greater “non-low-income” by percentage of total population than the total MTS service area average. *For example, if the total MTS service area average is 20% “low-income,” then a proposed service change that benefits a population that is 90% or greater “non-low-income” would be defined as a disproportionate burden.* If MTS chooses to implement a proposed change despite a finding of disproportionate burden, MTS may only do so if steps are taken to avoid or minimize impacts where practicable, and MTS provides a description of alternatives available to affected low-income populations (MTS Policy 42.6b).

### *Route 910 Disparate Impact and Disproportionate Burden Analysis*

Figure 1 shows low-income population and minority census block groups in the general area.

**Figure 1: Route 910 MTS Low-Income Analysis and Minority Populations**

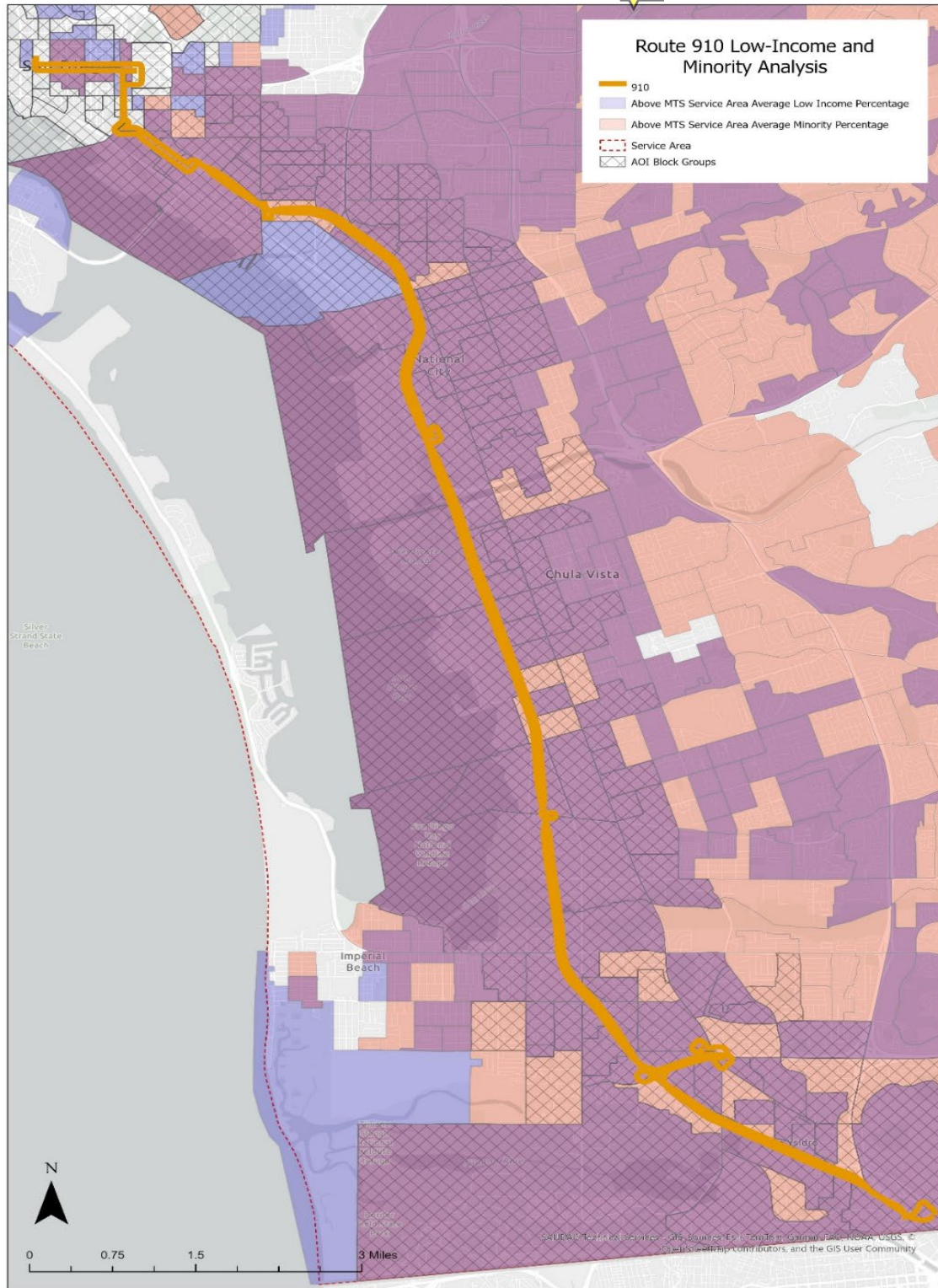


Table 1 shows the total MTS service area averages for minority and low-income populations, based on the data from the 2023 American Community Survey 5-year estimates, 2019-2023:

**Table 1: Service Area Averages**

Population	Service Area Average
Minority	59.2%
Low-income	24.3%

Table 2 presents minority and low-income population data within the MTS service area compared to minority and low-income population data for census block groups affected by proposed route changes.

**Table 2: Census Block Group Data of MTS Service Area and Route 910 Area**

	# of Census Block Groups	Block Group Population (Income Surveys)	Low-Income Population	% Low Income	Block Group Population (Race & Ethnicity Surveys)	Minority Population	% Minority
MTS Service Area Average	1,539	2,271,479	551,613	24.3%	2,334,375	1,381,911	59.2%
Route 910	157	231,943	87,927	37.9%	244,798	199,397	81.5%

The Route 910 service area includes a substantially higher proportion of minority and low-income populations compared to the MTS service area average. Approximately 81.5 percent of the population within the Route 910 block groups identifies as minority, compared to 59.2 percent systemwide. Approximately 37.9 percent of residents are low-income, compared to 24.3 percent systemwide.

As a result, Route 910 is classified as both a minority and low-income route for Title VI purposes. Since Route 910 is a benefit to the surrounding communities, and the surrounding communities are minority and low-income, implementation of Route 910 would not result in a disproportionate burden or disparate impacts to low-income and minority populations.