

# Memorandum

**DATE:** December 24, 2025  
**TO:** City of Victoria / Victoria MPO  
**CC:**  
**FROM:** ATG | DCCM  
**RE:** Service Impartiality Analysis

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## Introduction

In compliance with the [FTA Circular 4702.1B: Title VI Requirements](#), this analysis examines the proposed new transit routes for any potential disproportionate burden or disparate impact on Title VI populations. The following describes disproportionate burden and disparate impact according to the Federal Transit Administration (FTA).

“**Disproportionate burden** refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable” (FTA C 4702.1B, Chap. I-2).

“**Disparate impact** refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient’s policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin” (FTA C 4702.1B, Chap. I-2).

## Methodology

The following analysis is a comparison of demographic factors based on the quarter-mile walkshed of both the old and proposed routes. As the current routes have a quarter-mile walkshed covering around 14.2 square miles, and the proposed route walkshed covers around 12.8 square miles, there is an overall decrease in the total population within the walkshed.<sup>1</sup> The following analysis assesses whether this reduction disproportionately affects certain demographic groups.

The FTA does not specify the threshold of percent change which constitutes disparate impact but defers to local policies. For this analysis, the 80% rule is used as a general measure for disproportionate burden and disparate impact. This means that the disparity between the decrease in access between minority and non-minority and between low-income and non-low income must not exceed a level where the affected group experiences a loss greater than 120% of, or retains access at less than 80% of, the rate of the comparison group.

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<sup>1</sup> Walksheds in this analysis used are based on the quarter-mile buffer around the linear bus routes.

Census data was manually apportioned to the walkshed areas to estimate populations within walking distance of the existing and proposed routes.

All data was derived from the 2023 ACS 5-year estimates. The following ACS tables were joined by block group for this analysis:

- Low-Income - B17101
- Racial Minority - B02001
- Limited English Proficiency - B16004

## Analysis

Figure 1 shows the existing routes and their quarter-mile walkshed used in the analysis. Figure 2 shows the proposed new routes and their corresponding walkshed. The general changes to transit service include:

- Addition of service along N Main St in the west from the proposed Purple Route.
- Removal of service along John Stockbauer Dr east of Leary Ln from the former Gold Route.
- Removal of service along Port Lavaca Dr and Lova Dr from the former Teal Route.

Figures 3 through 8 display census data for the impacted block groups by demographic factor, comparing the existing and proposed walksheds.



Figure 2: Proposed Walkshed

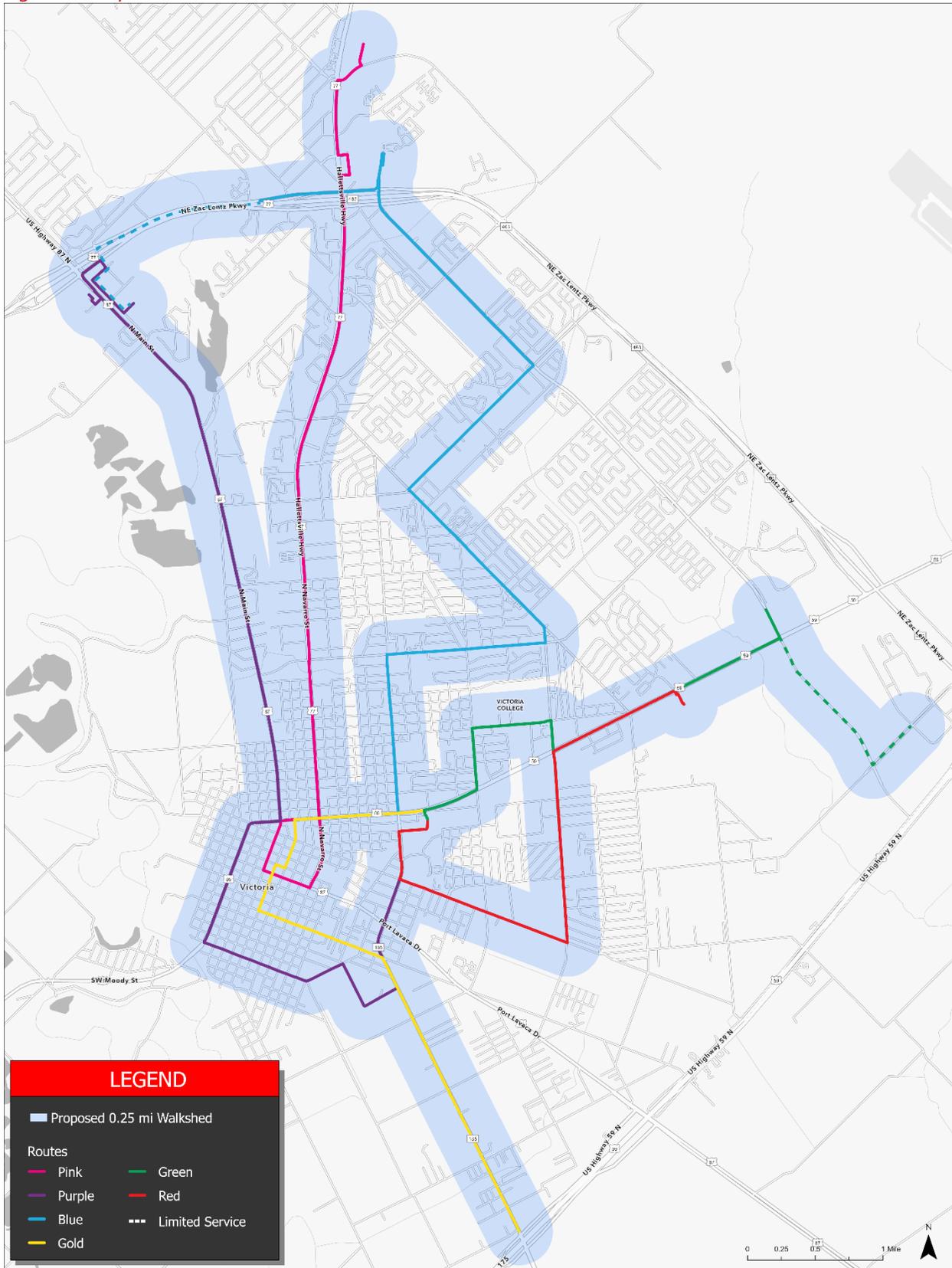


Figure 3: Existing Routes and Low-Income Population

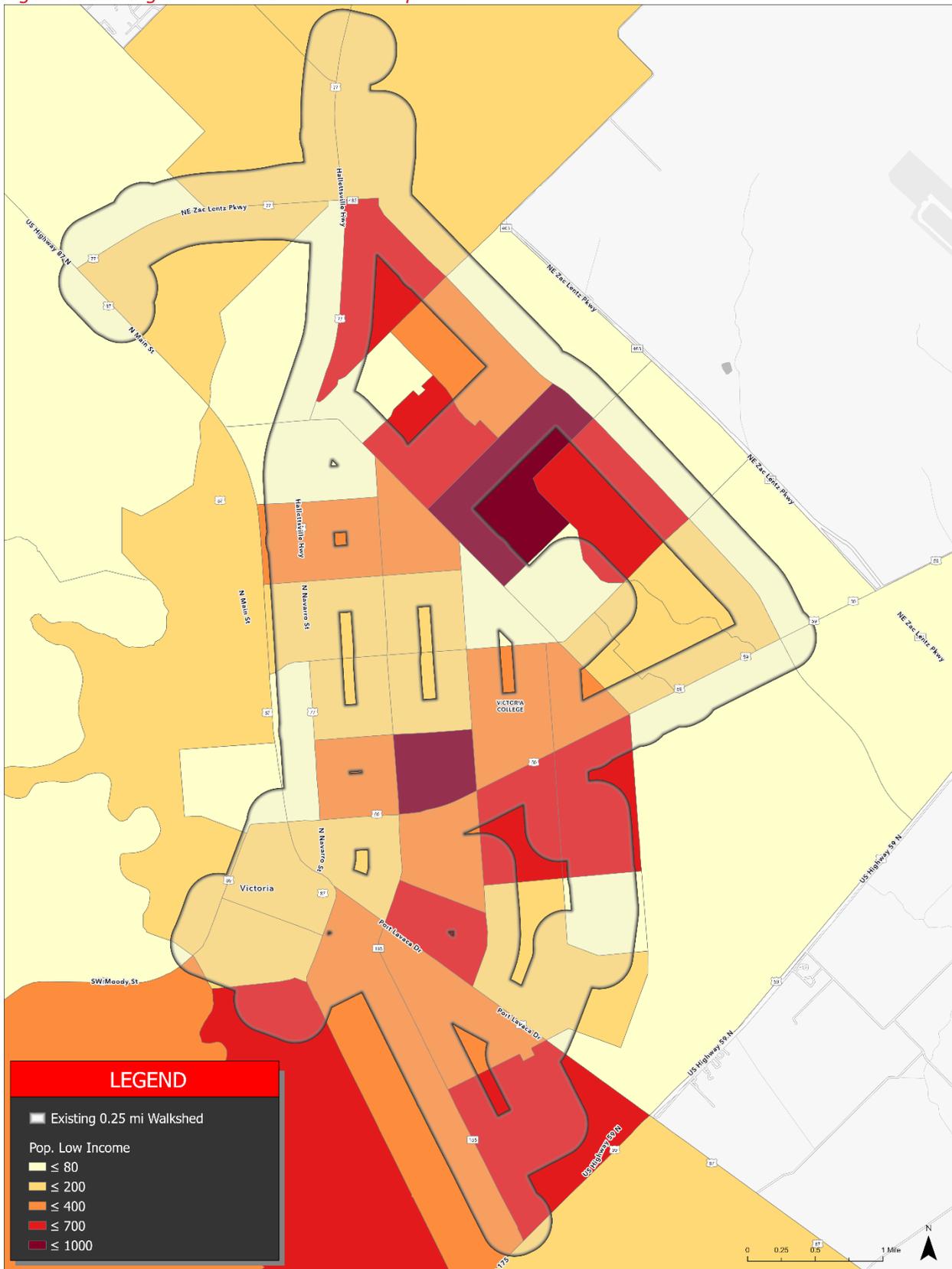


Figure 4: Proposed Routes and Low-Income Population

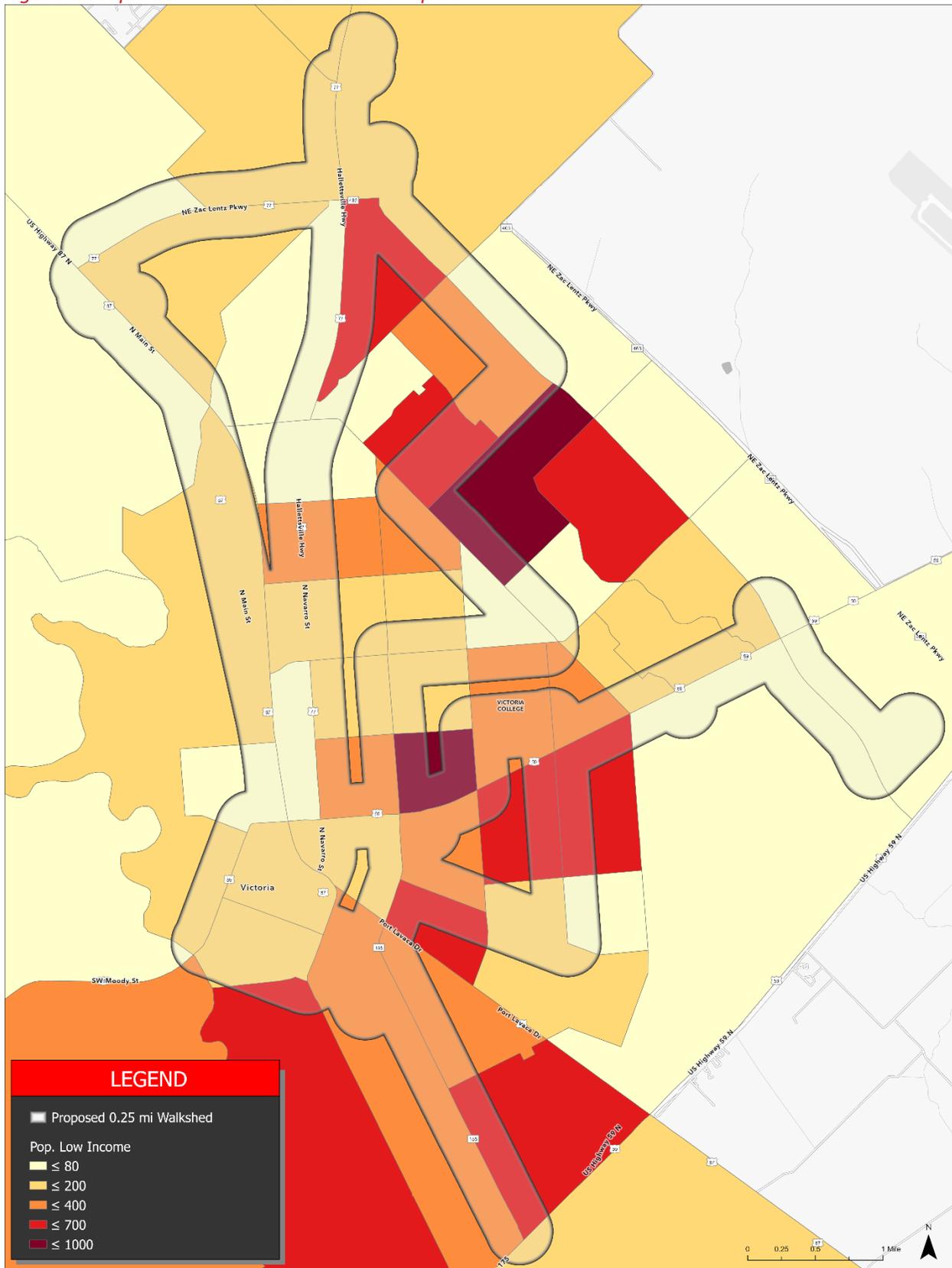


Figure 5: Existing Routes and Racial Minority Population

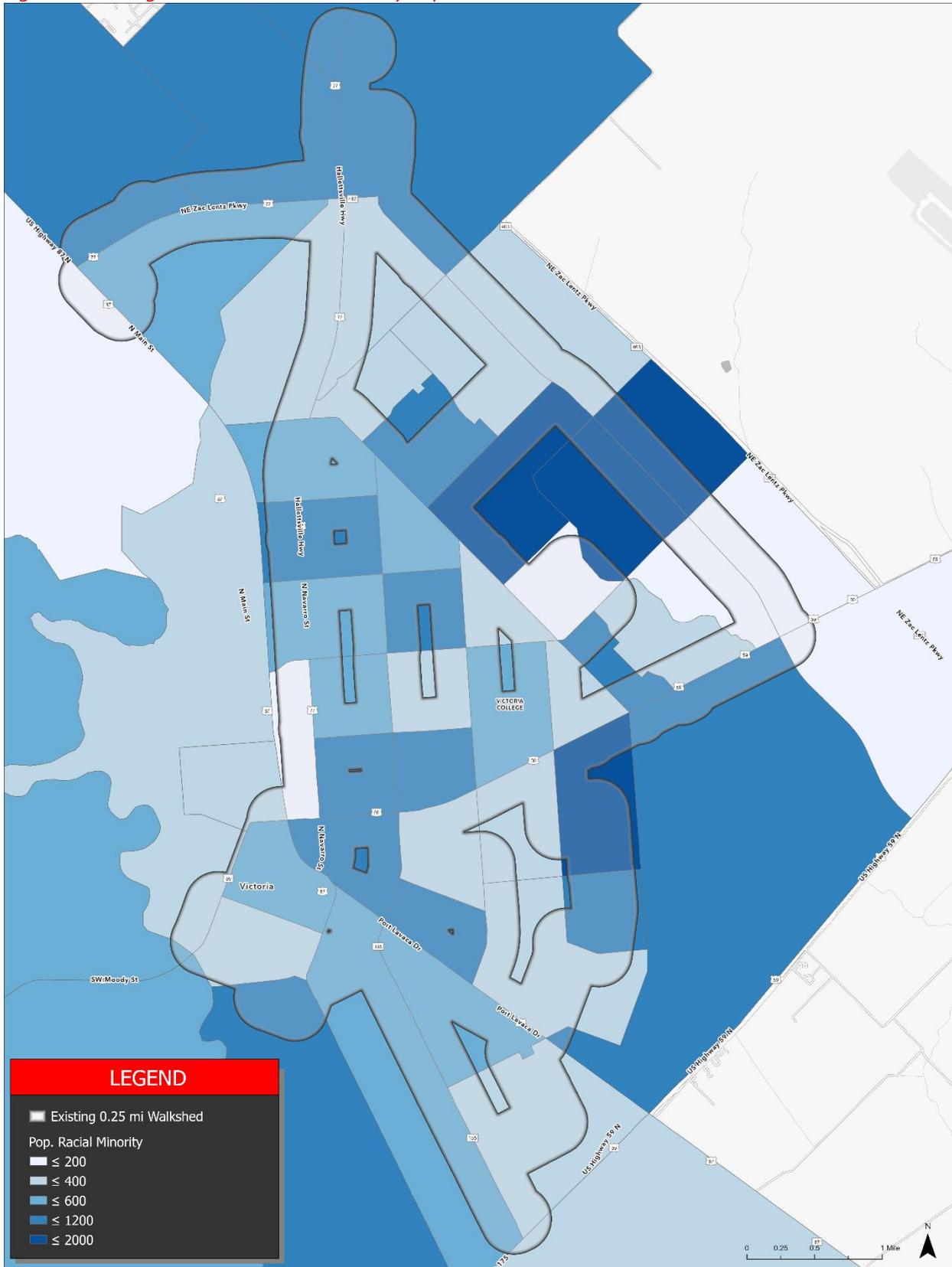


Figure 6: Proposed Routes and Racial Minority Population

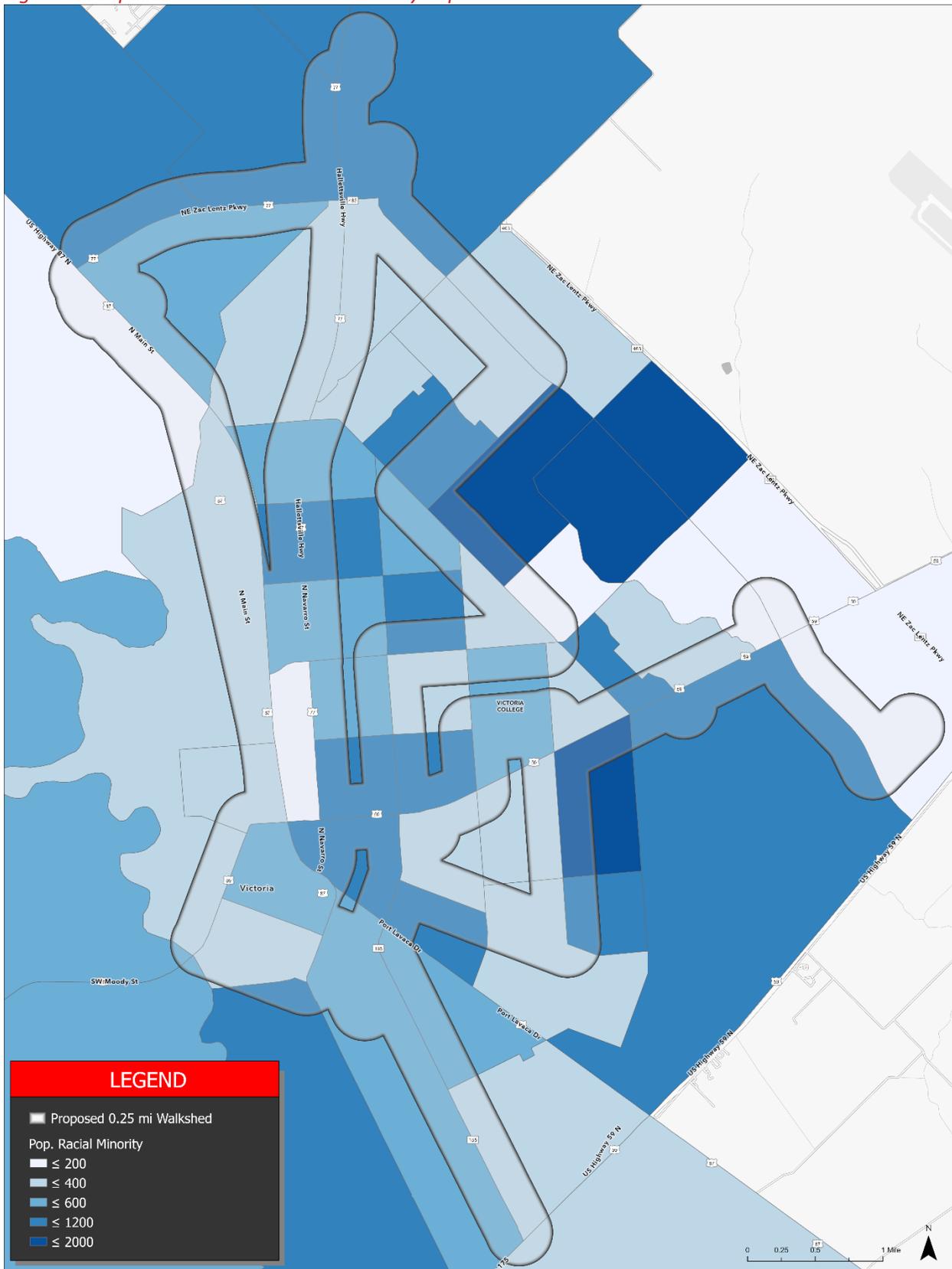


Figure 7: Existing Routes and LEP Population

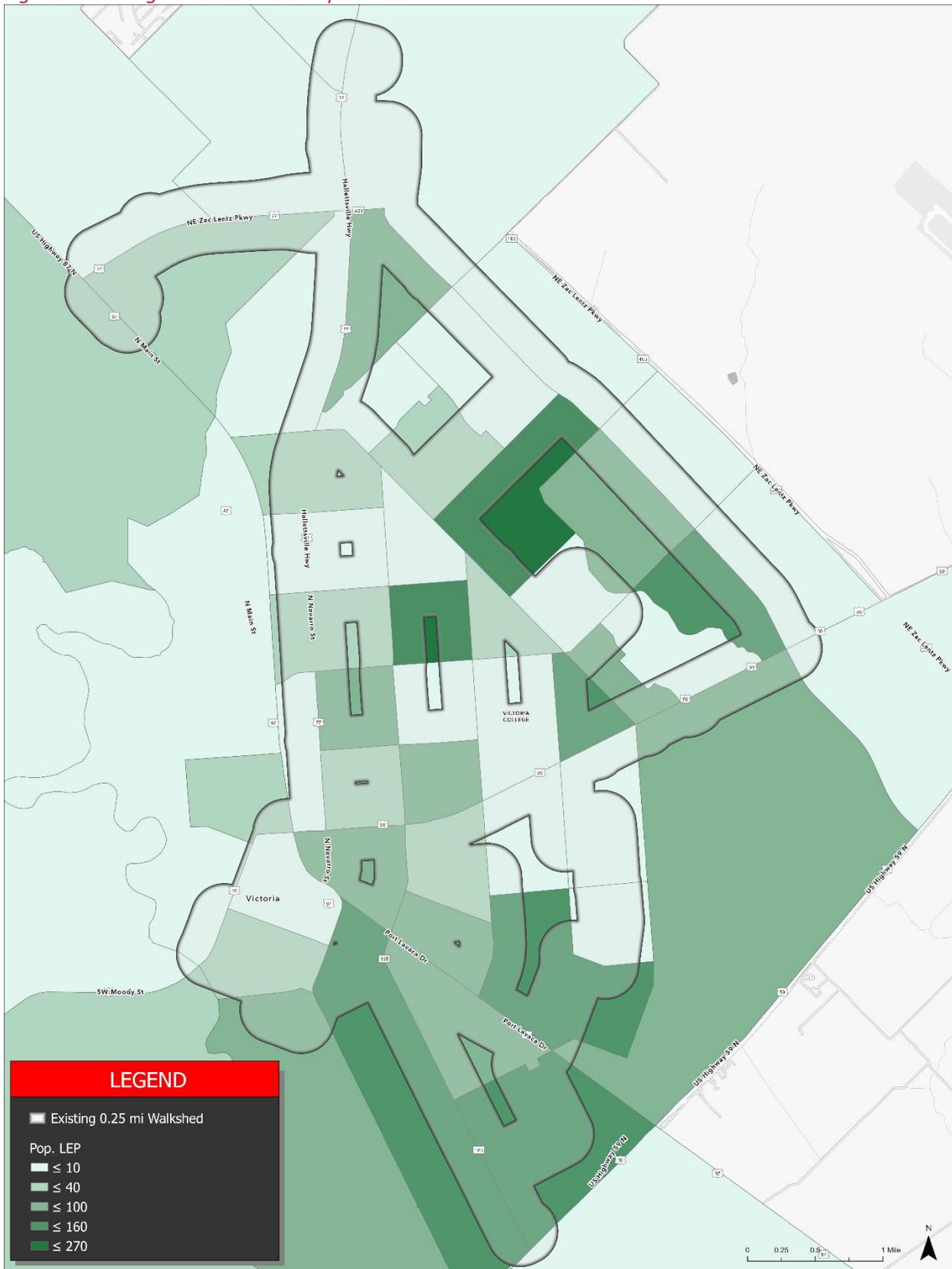
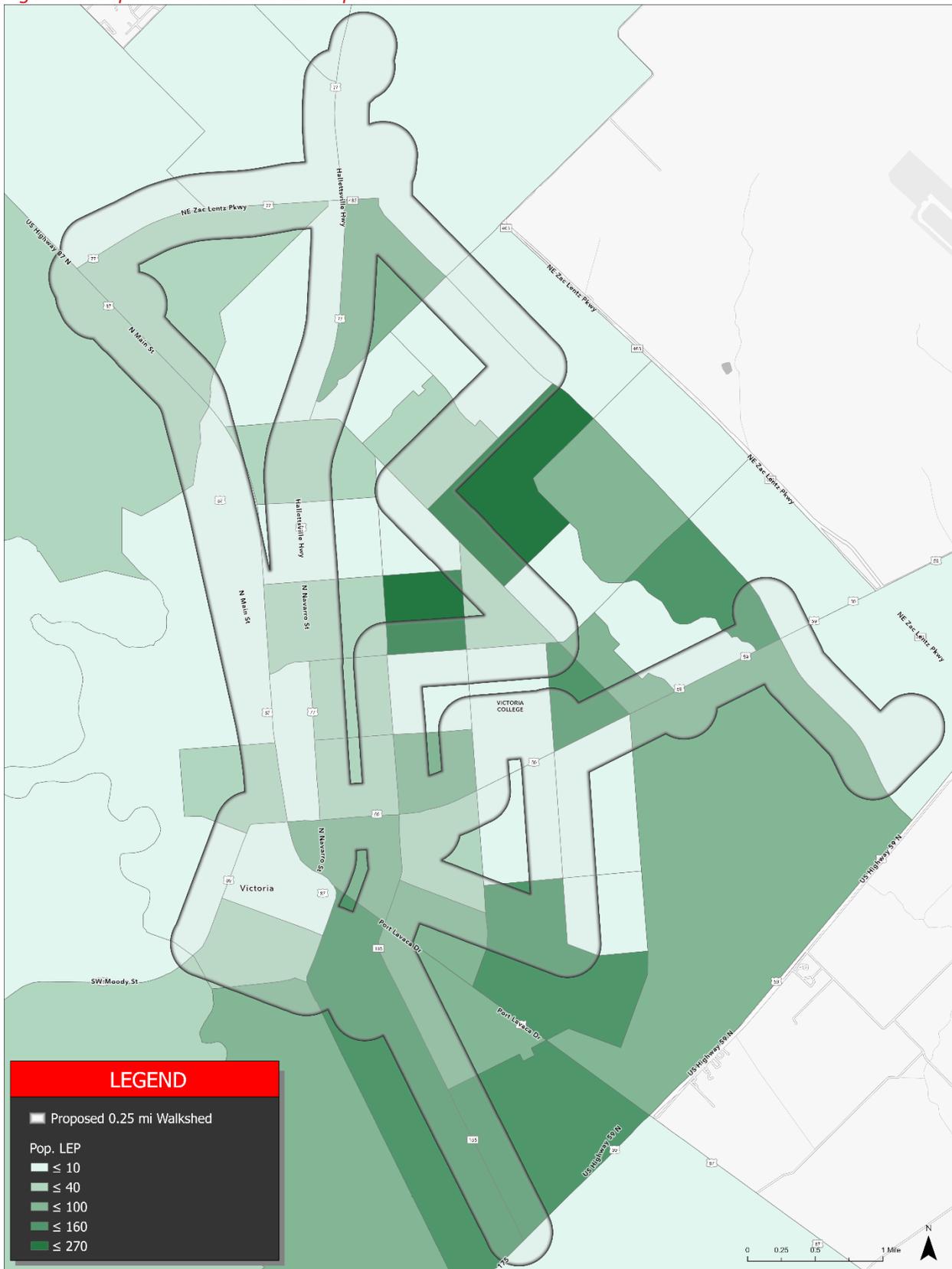


Figure 8: Proposed Routes and LEP Population



## Results

Table 1 shows the population estimates by target group within both the existing and the proposed walkshed.

As expected, all categories decreased in the proposed walkshed due to its smaller geographic area, with reductions between 24–32%.

To evaluate potential disproportionate impacts, the impact ratio was calculated by dividing the percentage retained of each target group by that of its non-target counterpart. **A ratio below 0.8 would indicate a disparate impact. All ratios were above this threshold, showing that target populations were not disproportionately affected.**

*Table 1: Population Decrease by Walkshed and Target Group*

Population Estimates						
	Low Income	Non-Low Income	Racial Minority	Non-Racial Minority	LEP	Non LEP
Existing Walkshed	8,223	29,709	18,268	21,126	1,267	35,280
Proposed Walkshed	6,249	20,987	13,083	15,302	862	25,460
% Decrease	24%	29%	28%	28%	32%	28%
% Retained	76%	71%	72%	72%	68%	72%
<b>Impact Ratio</b>	<b>1.07</b>		<b>1.00</b>		<b>.95</b>	