

TITLE VI SITE EQUITY ANALYSIS

ADOPTED: _____



City of Delano
Delano Area
Rapid Transit
(DART)

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Section 1 | Background

The City of Delano operates a public transit program marketed as Delano Area Rapid Transit (DART). DART provides service within city limits through four fixed routes and a demand-response (Dial-A-Ride) service that also serves unincorporated areas of Kern County immediately adjacent to Delano. Service is currently provided Monday through Friday from 7:00 a.m. to 5:00 p.m., and on Saturday from 8:30 a.m. to 4:00 p.m.

Section 2 | Study Purpose/Description

The City of Delano currently maintains a fleet of 19 transit vehicles: two sedans, six minivans, two small cutaways (≤ 25 ft), and nine larger cutaways (>25 ft). The City does not expect to significantly expand its fleet, anticipating only one to three expansion vehicles across the next 20 years.

The City currently has gasoline, diesel, and CNG fueling at its Corporation Yard. It does not utilize external vendors. The City would like to have gasoline, diesel, and CNG fueling as well as battery-electric charging capabilities at a dedicated transit maintenance facility.

Transit vehicles are currently stored at the Corporation Yard. However, there is no dedicated parking space for transit vehicles. As a result, there is insufficient parking space for the transit fleet. Therefore, transit vehicles must be continuously shifted around in order to have parking. Nor is there sufficient space to accommodate any fleet expansion.

The current maintenance facility (Corporation Yard) is located two miles from the transit center. There are no dedicated maintenance bays, although two “general use” bays are usually available for transit work. While there is no dedicated mechanic, the City has one mechanic who typically works on transit vehicles.

Currently, the City outsources transit fleet maintenance and repairs with respect to tires, A/C service, maintenance on CNG pumps, heavy chassis work, and vehicle suspension. It would like to be able to provide tires, heavy chassis work, and all A/C maintenance and repairs in-house, but is currently unable to do so given space, facility, and/or equipment constraints.

Administrative offices for the City’s transit program are located at the transit center. All administrative activities take place there, except for fleet maintenance and fueling (which occur at the Corporation Yard). The transit center features 2,700 square feet of administrative space and provides work space for a staff of 16 (transit manager, transit supervisor, lead driver, 10 drivers, two dispatchers, and one maintenance staffer). No non-transit functions currently operate from this location.

Transit management’s primary concern regarding the current administrative space is not only that it is unable to accommodate future growth, but that it is already insufficient for the City’s needs. The transit

center was never intended to serve as the primary operations and administrative facility. The current space allocation arrangement also negatively impacts the customer experience as well.

Management's primary concerns about the Corporation Yard include a lack of dedicated space for transit vehicle storage, lack of space to accommodate the planned battery-electric fleet charging infrastructure, lack of space for dedicated transit maintenance staff, and the inability to provide a full range of maintenance services due to a lack of space and/or equipment. As with the administrative space, it is already insufficient, and this will become more problematic as the City's transit programs continue to develop.

There also is no current training space. Drivers need to train, and the current arrangement requires drivers to train on the street in active traffic.

With Delano's population forecast to increase 35 percent between 2017 and 2042, the likelihood of needing to expand many of the City's programs is high. Even if the Transit program saw little to no growth, increased population would ultimately result in a need for greater resources for other programs served by the Corporation Yard, such as police cars, fire trucks, garbage trucks, street maintenance vehicles, etc. Therefore, relocating Transit to a dedicated facility would not only provide Transit with ample space to operate and grow, but would free up the space it formerly occupied at the Corporation Yard for other programs.

In addition, a very active rail line is located between the Corporation Yard and the transit center, and all crossings are at-grade. Depending on activity on the rail line, this can directly impact transit service on-time performance while also increasing vehicle deadhead time and (potentially) transit program operating cost. If activity on the rail line continues to increase (as is forecast), it is likely to have a greater impact on transit service delivery.

Section 3 | Title VI Compliance

The City of Delano is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its transit services on the basis of race, color, or national origin as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B. Further, Title 49 CFR Section 21.5(b)(3) states, "In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part." Finally, Title 49 CFR Part, 21, Appendix C, Section 3(iv) provides that, "The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color or national origin."

The City of Delano's current Title VI Non-Discrimination Policy and complaint procedure/complaint form are available online at www.cityofdelano.org/564/Title-6-Policy.

The City is required to conduct a Title VI site equity analysis to demonstrate that the facility site is selected without regard to race, color, or national origin. Per guidance in the Title VI circular, this analysis must:

- Include outreach to persons potentially impacted by the siting of the facility,
- Compare impacts of various siting alternatives,
- Determine if cumulative adverse impacts might result due to the presence of other facilities with similar impacts in the area, and
- Occur before the selection of the preferred site.

Section 4 | Site Selection Process

The City is currently considering a site located at 2727 West Industry Road in Delano. The site is owned by the City and is the former Delano Modified Community Correction Facility (MCCF). It is a six-acre lot with 60,000 square feet roofed and 18,000 square feet of open concrete courtyards. The facility includes a central administration building and two dormitory buildings, each of which includes an enclosed courtyard. The former MCCF site is located four miles from the transit center. There is no active rail line between this site and the transit center.

Exhibit 1 Location of Existing and Proposed Transit Facilities

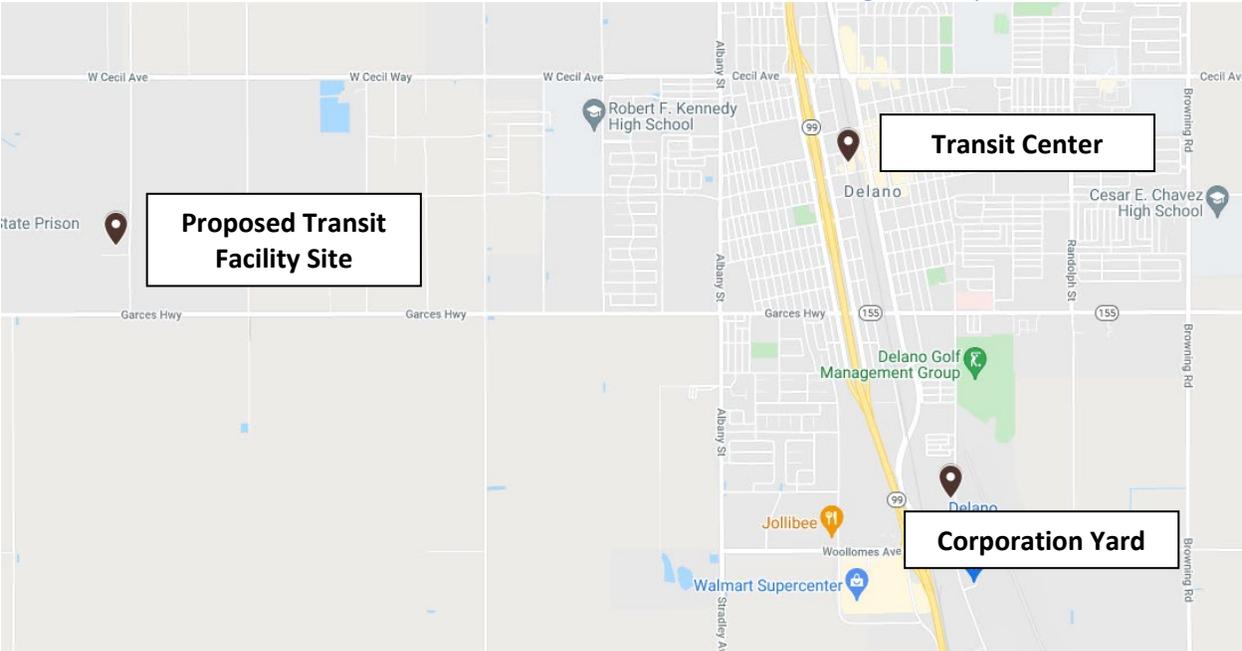


Exhibit 2 Ariel View of Proposed Location



Key facility features

In order for a potential dedicated transit maintenance facility to effectively meet the needs of the City's transit program across the next 20 years, it will need to include the following features upon full build-out:

1. Effective allocation of space within the property – 50 percent for vehicle storage and circulation, 25 percent for employee parking, and 25 percent for building space.¹ (Ideally, there would also be sufficient space to conduct driver “behind-the-wheel” training activities.)
2. Two maintenance bays sized appropriately for current and future fleet vehicles.
3. At least one in-ground or portable lift.
4. Other fleet maintenance work areas and appropriate equipment.
5. Tire shop and tire storage.
6. Parts room/storage.
7. Maintenance offices (with space for records storage).
8. Security fencing, access gates, and lighting.
9. Break room with kitchen.
10. Transit administration/operations offices.
11. Computer room and file storage.
12. Dispatch office.

¹ “A How-To Guide for Maintenance Facility Design,” *Fleet Maintenance*, by David A. Kolman, 11 July 2017. <https://www.fleetmaintenance.com/shop-operations/shop-management/article/20864422/howto-guide-to-maintenance-facility-design>

13. Money room.
14. Conference/training room.
15. Restrooms/locker rooms.
16. Reception area.
17. Fueling stations (gas, diesel, CNG, and battery-electric charging).
18. Fuel storage and/or generation (above-ground).
19. Utility area/bus wash.

At least one of the existing structures would likely need to be demolished to provide sufficient space for the fleet fueling infrastructure (storage tanks, pumps, battery-electric vehicle charging, etc.). From a site layout perspective, it would make the most sense to retain the central administration building and remove the east dormitory building so as to create sufficient space for the desired fueling infrastructure. The west dormitory building could also be demolished at a later date, or be excluded from the project altogether and used for another purpose.

Section 5 | Benefits and Burdens Analysis

The City of Delano reviewed the benefits and burdens of the proposed site as well as the current Corporation Yard to determine any impacts that might adversely affect the community. In summary, while there are many benefits to the existing location, there are also a number of burdens, including its proximity to a residential community, cumulative adverse effects (both air quality and noise) from other similar businesses, and the inability of the current site to accommodate any future growth. While the proposed site is further from the transit center and would require rehabilitation or demolition/construction, the neighboring properties are agricultural, industrial, or City-owned (such as the water treatment plan). It would also provide ample room for vehicle storage and future growth.

Exhibit 3 Location Benefits and Burdens

Benefits/Positive Impacts	Burdens/Adverse Impacts
<i>Current location (City Corporation Yard; 725 S. Lexington St.)</i>	
Existing maintenance facility	Close proximity to mobile home park immediately to the north
Existing fueling facility	Cumulative adverse effect due to other City vehicles and airport (air quality and noise) operating in close proximity
Most neighboring properties are similarly zoned (industrial/commercial)	Increase in traffic along Lexington with larger fleet
Good access to transportation corridors	Active rail line between location and transit center/service area
City-owned property	Limited vehicle storage capacity/no opportunity for growth
Approximately 1.7 miles from transit center	
<i>Proposed location (2727 W. Industry Rd.)</i>	
Neighboring properties are primarily industrial in nature; no residential	Would require demolition or rehabilitation of existing building and construction
Access to transit center/service area not impacted by rail line	Approximately 4 miles from transit center
Ample vehicle storage capacity/room for growth	
Good access to transportation corridors	
City-owned land	

Section 6 | Alternative Equity Analysis and Cumulative Impacts

Delano is a majority-minority community. Non-white residents comprise 41.9 percent of the population, while individuals identifying as Hispanic or Latino comprise 76.9 percent. As such, any impacts on the community as a whole have a comparable impact on minority communities. In addition, at least 39 percent of households in Delano are considered low- or lower-income (defined as less than 80 percent of the local average median income (AMI). The distribution of low-income households within Delano is shown in Exhibit 5. The proposed site has considerably less impact on low-income communities than the existing site.

Exhibit 4 Demographic Data

Race/Ethnicity	Number	Percentage
Total population	52,821	100.0%
White only	30,692	58.1%
Non-white or more than one race	22,129	41.9%
Hispanic/Latino of any race	40,606	76.9%
Total households	11,444	100.0%
Local average median income (AMI)	\$47,042	
80% of AMI for Delano	\$37,634	
Households with income <\$35,000	4,463	39.0%

Source: American Community Survey 2015-2020 5-year estimates.

Exhibit 5 Distribution of Low-Income Population

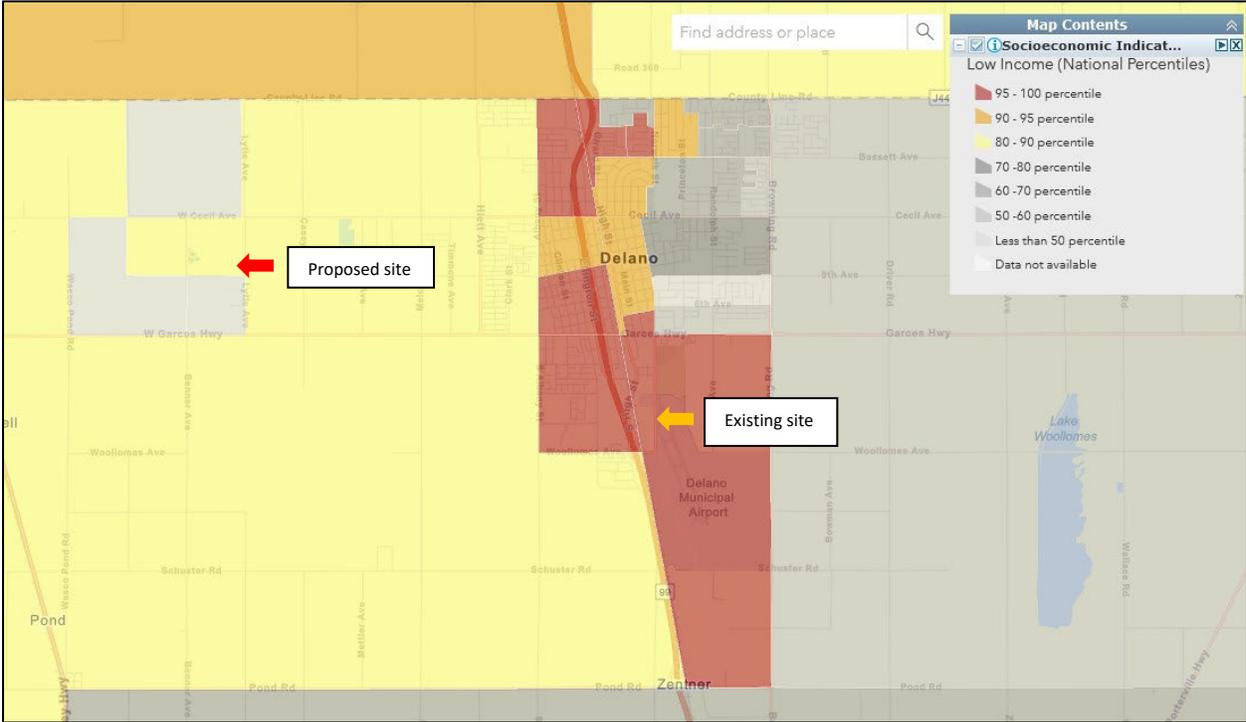


Exhibit 6 Equity Impact Comparison

Impact Criteria	Existing Site	Proposed Site
Who would be impacted by selecting this site?	Nearby businesses Nearby residential	Nearby businesses Nearby utilities
Will selecting this site require displacement of residents or businesses?	No	No
What other similar facilities are nearby?	Tractor company, veterinary hospital, electric vehicle charging station, mobile home park, airport, chemical manufacturer, self-storage facility	Machine shop, water treatment plant, agriculture

According to the 2020 Decennial Census, there is no resident population of the census block group in which the proposed site is located. There is a population of approximately 1,600 in the census block group where the existing site is currently located. As such, the proposed site would have less impact on residents and businesses as well as less cumulative impact from surrounding industrial facilities. As such, the alternative equity analysis found there were no adverse or cumulative impacts per the Title VI regulations.

Section 7 | Community Outreach

Prior to development of the Site Equity Analysis, the City of Delano reached out to property owners in close proximity to the proposed location at 2727 West Industry Road via mail. The letter invited property owners to submit comments regarding the change in usage. **No responses or comments were received.**

The draft Site Equity Analysis was published in draft format in June 2022, and a 30-day review period was established. During that review period, the draft Analysis was made available on the City’s transit website. A formal notice of public hearing was published in the City’s newspaper of record (*Bakersfield Californian*) and notices were posted onboard transit vehicles, via social media, and on the City’s transit website.

A public hearing will be held on July 18, 2022, at the regular meeting of the Delano City Council. *Any public comments received during the public review period or during the public hearing will be detailed below.*

Section 8 | Conclusion

The location at 2727 West Industry Road was selected for the City's transit maintenance and operations facility without regard to race, color, or national origin. An evaluation of the demographics of the site (as compared to the existing location) shows no disparate impact will occur through selection of this site. This is based on the fact there is no residential population within proximity to the site. There is also no cumulative impact from the proposed site, as the number of businesses is extremely small and none provide the same type of services. Therefore, the conclusion from this Title VI Site Equity Analysis is that there is no apparent disparate impact for the proposed location at 2727 West Industry Road.