

To: Board of Directors

Date: 3/10/2020

From: Melody Reeb, Manager of Planning

Reviewed by:



SUBJECT: Continuation of Monument Free Program and Approval of Title VI Fare Equity Analysis

Background:

At the February 2019 Board meeting, the Board approved a pilot program to subsidize fares on weekday Routes 11, 14, and 16. These routes serve low-income communities along the Monument Corridor and connect from Concord BART to various destinations in Martinez, Pleasant Hill, and Walnut Creek. Below is a description of the routes and areas served:

- **Route 11:** Concord BART – Oak Grove Rd – Treat Blvd – Pleasant Hill BART
- **Route 14:** Concord BART – Monument Blvd – Pleasant Hill BART – Walnut Creek BART
- **Route 16:** Concord BART – Monument Blvd – Gregory Ln – Alhambra Ave – Contra Costa Regional Medical Center – Martinez Amtrak

County Connection began offering free fares on these routes on July 1, 2019. The program is being funded by a grant through California's Low Carbon Transit Operations Program (LCTOP).

The goal of the pilot was to increase ridership and make transit more accessible and affordable, particularly to low-income communities along the Monument Corridor. Over the first six months of the pilot, average daily ridership on Routes 11, 14, and 16 increased 54.6% compared to the same period the prior year. Given the program's success, staff is proposing to continue the program, as long as funding remains available through LCTOP or another similar funding source. At the February 2020 Board meeting, the Board approved an additional allocation of LCTOP funding for the program during Fiscal Year 2019-2020. The program is subject to termination if funding becomes unavailable in the future.

Title VI Requirement:

As a federal grant recipient, the County Connection is required to maintain and provide to the Federal Transit Administration (FTA) information on its compliance with Title VI of the Civil Rights Act of 1964 (Title VI), which prohibits discrimination on the basis of race, color, and national origin by recipients of federal financial assistance. The FTA further requires that

recipients of FTA financial assistance conduct an analysis on all fare changes to assess the impacts of those changes on low-income and minority populations. As the free fare program will reduce the fares on the affected routes, implementation of the program is a fare change requiring an equity analysis under the FTA's Title VI regulations.

Analysis:

As a reduction in fare is a benefit, the relevant disparate impact analysis examines the allocation of benefits from the fare reduction among minority riders on the affected routes relative to their share of the ridership as a whole. Similarly, the relevant disproportionate burden analysis examines the allocation of benefits from the fare reduction among low-income riders on the affected routes relative to their share of the ridership as a whole.

Based on onboard survey data from October 2019, 56.1% of all County Connection riders identify as minority, and 44.4% are considered low-income. On the three routes that would be free under the Monument Free Program, 58.9% of riders identify as minority and 43.2% are low-income.

	% Minority	% Low-Income
Route 11	58.3%	41.7%
Route 14	65.8%	59.0%
Route 16	51.5%	25.0%
Monument Free Program Total	58.9%	43.2%
Systemwide	56.1%	44.4%
Difference from Systemwide	2.8%	-1.2%

There is no disparate impact on minority riders from the implementation of the Monument Free Program. The routes that benefit from the program have a slightly higher minority ridership (58.9%) than the system as a whole (56.1%) by a margin of 2.8%.

There is also no disproportionate burden on low-income riders from the implementation of the Monument Free Program. The usage of the affected routes by low-income riders is slightly lower (43.2%) than their share of the ridership on the system as a whole (44.4%). However, the differential of 1.2% is well within the 20% threshold set forth in the disproportionate burden policy.

Public Outreach:

As part of the initial pilot, staff launched a bilingual marketing campaign to inform riders of the new program. This included notices and “Take One” information cards on vehicles, posters distributed to community partners, information on County Connection’s website, and social media posts. Staff also conducted over 30 outreach events at community based organizations, including Monument Crisis Center, Monument Impact, senior centers throughout Concord and Martinez, and schools, as well as in-person outreach at major bus stops and BART stations.

In February 2020, staff began additional outreach to receive public comment on the proposed continuation of the pilot program. A public hearing has been scheduled for March 19, 2020 preceding the Board of Directors meeting at County Connection offices in Concord. The public was also able to submit written comments via mail, email, and online through County Connection’s website.

As of March 12, 2020, a total of 29 comments were received: 23 comments were in favor of continuing the program, and 4 comments were opposed or suggested modifications to the program, such as charging a nominal fare. Two (2) comments either took no position or were unrelated to the proposal. A summary of written comments is included as an attachment. These comments, as well as those received at the public hearing, will be included in the final Title VI report, which will be presented to the Federal Transit Administration.

Financial Implications:

LCTOP funds will be used to subsidize fares on Routes 11, 14, and 16 as part of this program.

Recommendation:

The MP&L Committee and staff recommend the Board approve the continuation of the program, as long as funds are available through LCTOP or another similar funding source, and that the Board review and approve the attached Title VI Fare Equity Analysis. The analysis has been reviewed by legal counsel, and the public outreach section will be updated upon completion of the scheduled public hearing.

Action Requested:

The MP&L Committee and staff request Board approval of Resolution 2020-017.

Attachments:

Attachment 1: Title VI Fare Equity Analysis
Attachment 2: Summary of Public Comments