

To: Board of Directors

Date: February 8, 2012

From: Laramie Bowron, Manager of Planning

Reviewed by:

---

## **SUBJECT: Title VI Update**

---

### **Summary of Issues:**

Every three years transit operators receiving Federal funding are required to complete a Title VI analysis to ensure that low-income and minority populations are not discriminated against in terms of the quality and frequency of service they receive. The availability of 2010 Census data allowed CCCTA an updated snapshot of their service area. Staff broke the data down by Census tracts and aggregated the data based on the all of the tracts touched within CCCTA's service area. According to the analysis CCCTA is providing either equal or superior service to low-income and minority populations that reside in CCCTA's service area. CCCTA serves 101 census tracts with minority populations making up 37.1% of CCCTA's service area. Census tracts within CCCTA's service area with a minority population greater than 37.1% were categorized as minority tracts. CCCTA provides 48.5% of its revenue hours to minority census tracts. The FTA requires Board approval of Title VI updates. The report and exhibits are attached to this memo.

Notable differences between 2000 and 2010 Census data include:

- Population of Service Area: Decreased by 3.6%
- Percent Minority Population: Increased by 14%
- Population Living Below Poverty Line: Increase from 4.6% to 5.7%

Since this report was presented at the February MP&L Committee Meeting, some minor, non-substantive edits were completed at Madeline Chun's request.

### **Action Requested:**

The MP&L Committee recommends the adoption of a resolution authorizing adopting the 2012 Title VI Report.

### **Financial Implications:**

None

### **Attachments:**

Title VI Update and Exhibits

# Central Contra Costa Transit Authority

## Concord, California

### Title VI Update

Date: January, 2012

Prepared by: Laramie Bowron, Manager of Planning

---

**Background:** The Central Contra Costa Transit Authority receives Federal financial assistance to provide transit services. Federal funding is received as FTA Section 5307 formula assistance and FTA Section 5309 capital assistance. CCCTA has a service area population estimated at 520,000 and is required to submit 'General and Program Specific Reporting Requirements' for a Title VI update. Title VI refers to Prohibitions Against Discrimination in Federal Programs.

#### I. Procedures, Policies, and Background

1. CCCTA is involved in several efforts to that enhance outreach and involvement of the low income, and minority communities:
  - CCCTA has a Transit Ambassadors program which trains people who are transit riders to provide help to other CCCTA passengers through information dissemination and one-on-one assistance negotiating the bus system.
  - CCCTA has continued its policy of conducting public hearings for fare changes and significant service changes. Spanish speaking staff is made available at public hearings. Locations and times of public hearings are designed to accommodate the transit dependent. A table of public hearings held since the previous Title VI update is provided as attachment-1.
  - CCCTA has Spanish speaking customer service staff that provides schedule information and complaint resolution. Attachment-2 shows the number of customer service calls received in Spanish during the 2011 calendar year.
  - CCCTA has a language translation service for phone calls and for web users.
2. A copy of the CCCTA Limited English Proficiency Plan is provided as attachment-3.

3. A copy of the agency procedures for tracking and investigating Title VI complaints is provided as attachment-4.
4. Since the last Title VI Update CCCTA has received 1 complaint. The complaint was received on November 28, 2011 and indicated that CCCTA had denied eligibility for paratransit service under the ADA based on discrimination of a disability. This claim was denied because it did not fall under the parameters of Title VI of the Civil Rights Act of 1964. It was deemed as an ADA complaint rather than a Title VI complaint and the complainant was advised on the appropriate way to file a complaint of discrimination based on a disability under the provisions of the ADA.
5. CCCTA currently includes information about its compliance with Title VI in the full Short Range Transit Plan updates. CCCTA has a public notice regarding CCCTA's Title VI policy on the agency's web page, system map and onboard poster.

The text of the CCCTA Title VI notice to the public is shown below:

*The Central Contra Costa Transit Authority (CCCTA) operates its services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with CCCTA. For more information on CCCTA's civil rights program, and the procedures to file a complaint, contact 925-676-1976; email [madrigal@cccta.org](mailto:madrigal@cccta.org); or visit our administrative office at 2477 Arnold Industrial Way, Concord, CA 94520. For more information, visit [www.cccta.org](http://www.cccta.org). If information is needed in another language, contact 925-676-1976.*

## II. Demographic Data:

CCCTA demographic and Service Profile Maps and Charts:

1. CCCTA has included a census tract map that shows fixed route transit service. See attachment-5.
2. CCCTA has included census tract maps that show concentrations of minority populations in our service area. See attachment-6.
3. CCCTA has included a census tract map that shows concentrations of low-income populations as defined as the percentage below the poverty level in our service area. See attachment-7.

4. CCCTA has included a chart of census tracts that show the numbers and percentages for each minority group in the service area. CCCTA serves 101 census tracts with minority populations making up 37.1% of CCCTA’s service area. Census tracts within CCCTA’s service area with a minority population greater than 37.1% were categorized as minority tracts. CCCTA provides 48.5% of its revenue hours to minority census tracts. All of the tracts served by CCCTA along with those that are minority tracts are provided in attachment-8.
  
5. CCCTA has included a chart of census tracts that show the numbers and percentages low income populations in the service area. CCCTA serves 101 census tracts with 5.7% of the population within CCCTA’s service area living below the poverty line. Census tracts within CCCTA’s service area with a poverty population greater than 5.7% were categorized as low income tracts. All of the tracts served by CCCTA along with those that are low income tracts are provided in attachment-9.

*Note: All population and demographic data is based on Census 2010 data.*

### III. Additional Demographic Data from Passenger Surveys:

#### Survey Information on Customer Demographics and Travel Patterns.

In addition to the data provided in the above section based on Census tract analysis CCCTA has also included the most recent Onboard Passenger Survey. A summary of demographic findings is provided below and the Final Report is attached in its entirety as Appendix A:

#### **CCCTA Data from the 2007 Onboard Passenger Survey – Transit Marketing LLC**

Race/Ethnicity	CCCTA
Total	1988
White	40%
Spanish/Hispanic/Latino	23%
Black/African American	13%
Asian	19%
American Indian or Alaska Native	2%
Other	3%

Income	
Total	1988
Under \$15,000	31%
\$15,000 to \$24,999	17%

\$25,000 to \$49,999	20%
\$50,000 to \$74,999	12%
\$75,000 to \$99,999	8%
\$100,000 or higher	12%

Survey Language	
Total	1988
English	85%
Spanish	15%

The Central Contra Costa Transit Authority will be conducting a detailed passenger demographic survey in 2012. Results of this survey will be provided in the next Title VI update.

#### IV. System-wide Service Standards:

This section outlines system-wide service standards adopted by CCCTA in order to comply with 49 CFR Section 21.5(b)(2) and (7).

Vehicle load and on-time performance attachments include both minority and non-minority routes. Minority routes are determined by the number of revenue miles within each census tract. A minority route has more than 33% of its revenue miles in minority tracts. CCCTA’s minority routes are documented in attachment-10.

##### (1) Vehicle load:

CCCTA has implemented a minimum vehicle load standard based on the level of ridership necessary to justify continued transit service on a route. The current load factor standard for CCCTA is 0.44 with a minimum of 0.38 during the AM peak period. Our most recent load factor data shows a system-wide average of 0.75. The average for routes designated as minority routes is 0.79, slightly higher than the 0.67 observed for non-minority routes. This indicates sufficient vehicle capacity on routes serving minority census tracts. The range in load factors is between 0.16 for Route 649 and 1.65 for Route 96X. These numbers are based on the max load experienced in the Winter 2011 period and the average number of seats on CCCTA’s fleet. This data is derived from an automatic passenger counting (APC) system that CCCTA has recently installed allowing for more accurate and consistent data reporting. CCCTA will adopt a vehicle load maximum standard of 1.25 for the peak period and 1.00 for the off peak as the current minimum load is used to justify current service levels. CCCTA will include this in the next update of goals, objectives and performance measures in the next Short Range Transit Plan update. The most recent load factor data using the new APC system is included as attachment-11.

##### (2) Vehicle headway:

Vehicle headway is the time interval between two vehicles traveling in the same direction on the same route. The current headways are a result of the budget and ridership. Headways were decreased on some routes to reflect budget cuts. The standards for vehicle headways had to be broken to balance the budget. The most frequent service is generally in areas with high concentrations of low income populations or minorities. Vehicle headways are directly related to the level of service and when CCCTA evaluated service distribution to minority tracts using ArcGIS software it exceeded the population share of minority tracts within CCCTA's service area (as seen in attachment 6). CCCTA will add vehicle headway standards in the next Short Range Transit Plan update. The proposed new standards (shown below) will be evaluated before adoption to make sure they do not result in redistribution of service that is detrimental to low income and minority communities.

Density	Service Type	Period	
		Peak	Off-Peak
Medium/High Density	Local	30-minute	60-minute
	Express	30-minute	
Low Density	Local	60-minute	
	Express	60-minute	

(3) On-time performance:

The CCCTA on-time performance standard is based on the departure time from timepoints, and is defined as on time to five minutes late. In the past data was collected by staff working in the field. The current service standard is 95% on time performance. CCCTA has recently installed an automatic passenger counting (APC) system in conjunction with Ridecheck software that can generate detailed on-time reports for all timepoints. The data quality of the new system is based on 100% sample of timepoints and stops and is being used for this Title VI report. The actual on-time performance observed during the Winter 2011 period is lower than the adopted standard and is more accurate as it is a much larger sample as it reflects data from all timepoints. Routes determined to be minority routes have a higher on-time performance than those routes not serving minority populations. A table showing on-time performance by route is included as attachment-11.

(4) Distribution of transit amenities:

Transit amenities often comfort and convenience to the general riding public. Most transit amenities in CCCTA's service area are installed and maintained by

an advertising company that contracts with the local municipalities and are not controlled by CCCTA. At this time there isn't a need for a CCCTA transit amenities standard as the local jurisdictions control shelters and benches. In FY12 CCCTA will be conducting a bus stop access improvement plan that will focus on upgrading CCCTA's bus stops in a manner that benefits the most riders. This plan will also look at existing bus stops that are in minority census tracts and will provide an evaluation of bus stop conditions and amenity projects that CCCTA will pursue in coordination with local jurisdictions.

(5) Service availability:

Service availability is a general measure of the distribution of routes within a transit district. CCCTA established service equity standards. The standard evaluates service levels measured as revenue hours of service provided in each community compared to each community's share of the population, employment, higher density housing, low income population, and senior, youth, and disabled population. The title of the policy is "Equity Methodology". The policy will be adopted by the board of directors as a part of an update of the Short Range Transit Plan in summer 2012. This evaluation found that current service levels (in revenue service hours) are in compliance with the policy. A copy of the policy is included with this report as attachment-12. In addition, CCCTA has evaluated service availability to minority census tracts using ArcGIS software to ensure service equity.

## V System-Wide Service Policies:

This section outlines all system-wide service policies adopted by CCCTA since the last submission.

(1) Vehicle assignment:

Title VI defines vehicle assignment as the process by which transit vehicles are placed into service on routes throughout the recipient's system. All routes operate out of one garage and there is not an issue of measuring vehicle age and quality by home garage. Bus assignment by route is a function of ridership levels (bus capacity), signage and design issues (express buses and replica trolleys), and route geometrics (turning capability). The quality of the CCCTA fleet is good and the average age is 7.6 years. All of the buses in the CCCTA fleet were built by Gillig. Nine of CCCTA's 121 fixed-route buses are hybrid diesel-electric with the remaining fleet being diesel powered. All buses include two wheelchair tie-downs and automatic passenger counters. Over 80 percent of the fleet is designed with low floors and wheelchair ramps and the rest are designed with high floors and wheelchair lifts. Bus type assignments by route are created with the goal of

providing equitable distribution of buses to meet Title VI goals. Vehicle age data is included in the following table:

<b>Fleet Age - January 2012</b>						
<b>Fixed Route</b>						
<b>#of Buses</b>	<b>Description</b>	<b>Series</b>	<b>Year in Service</b>	<b>Age of Fleet (Yrs)</b>	<b>Bus Years (Age multiplied by # of buses)</b>	
10	Heavy Duty bus - 40'	2000-2009	2000	12	120	
7	Heavy Duty bus - 30'	100-106	2001	11	77	
14	Heavy Duty bus - 40'	200-213	2002	10	140	
18	Heavy Duty bus - 30'	300-317	2002	10	180	
13	Heavy Duty bus - 35'	400-412	2002	10	130	
19	Heavy Duty bus - 40'	500-518	2002	10	190	<b>Average</b>
40	Heavy Duty bus - 40'	900-940	2010	2	80	<b>Age (Yrs)</b>
<b>121</b>					<b>917</b>	<b>7.6</b>

(2) Transit security:

Transit security measures have been undertaken to protect employees and the public against any intentional act or threat of violence or personal harm, either from a criminal or terrorist act. All buses in the CCCTA fleet are equipped with radios, silent alarms, and security cameras. The transit hubs CCCTA uses are generally under the control of BART stations or on private property. CCCTA has utilized funding for security improvements including improved vehicle camera systems, vehicle radio systems, and operations facility security enhancements to protect all of CCCTA's employees. At this time CCCTA doesn't need route or area specific transit security standards.

VI. Evaluation of Service and Fare Changes:

No fare or major service changes have taken place since the previous CCCTA Title VI Report.

VII. Monitoring Procedures and Results:

Attached are copies of the results from service monitoring, quality of service monitoring, demographic analysis, customer surveys.

- CCCTA has purchased Ridecheck plus software that increases the volume of data from the APC's and this enables better monitoring.



- CCCTA has integrated ridership and census data using ArcGIS that allows for census analysis of service equity. Reports on on-time performance, vehicle load, and service in census tracts are attached.

## VIII. Analysis of CCCTA Construction Projects

CCCTA currently has no on-going construction projects. The bus transfer facility called the Pacheco Transit Hub has been passed on to the Contra Costa Transit Authority for completion.

***Attachement 1 Public Hearing Log***

<b>CCCTA Public Hearing Log - 2011 -Present</b>	
<b>Hearing Description</b>	<b>Date</b>
Rt. 622 Public Hearing	December 14, 2011

## ***Attachment-2 2011 Spanish Calls***

### **Calendar Year 2011**

<u>Translated Calls</u>		<u>% that were Spanish</u>	<u>Total Calls Answered</u>
January	15	100	7372
February	11	100	6437
March	11	100	6631
April	35	97	7402
May	21	100	6428
June	13	85	6948
July	21	100	6440
August	18	100	8107
September	15	100	7301
October	12	100	6985
November	10	100	6750
December	18	100	6478
Total:	200	99%	83279

Overall Average of Translated Calls per Month

## **CCCTA Limited English Proficiency Plan January 2012**

### **Task 1: Identifying LEP Individuals Who Need Language Assistance**

CCCTA is using the 2010 U.S. Census to identify areas with high concentrations of limited English proficiency populations. CCCTA is also using data from the 2007 On-board passenger survey, the MTC regional onboard transit survey, and working relationships with nationhood and community organizations. In CCCTA's on-board survey conducted in the fall of 2007, 14% of the surveys were completed in Spanish. Language information from the Census is included as an attachment. The MTC 2006 Transit Passenger Demographic Survey indicated that 2.2% of the surveys were conducted in languages other than English or Spanish, with Mandarin being the second third most common language.

- 1. Data collected from the U.S. Census as well as state and local demographic data;*
- 2. Information gathered from community organizations that serve LEP persons;*
- 3. Information gathered from face-to-face meetings with LEP persons or from surveys of LEP persons;*
- 4. Information gathered from interviews with agency staff who typically come in contact with LEP persons;*
- 5. Information kept by the agency on past interactions with members of the public who are LEP.*

### **Task 2: Language Assistance Measures**

CCCTA currently has the following language assistance measures in place:

- CCCTA produces major customer information documents in both English and Spanish.
- All of the CCCTA web pages may be translated using online tools.
- Customer service staff is trained on how to use the telephone language line for over the phone translation services. This service is used on average 17 **times** per month with all of the calls in Spanish.
- CCCTA provides bilingual (Spanish speaking) staff at public hearings and neighborhood meetings.
- The Customer Service staff for both telephone and in person assistance includes bilingual (Spanish speaking) staff.

## Attachment 3

- All public timetables include a note in Spanish on how to use the language line to get transit information.
  - System maps and riders guides are printed in both English and Spanish.
1. *A list of what written and oral language assistance products and methods the agency has implemented and how agency staff can obtain those services;*
  2. *Instructions to customer service staff and other agency staff who regularly take phone calls from the general public on how to respond to an LEP caller. (Ideally, the call taker will be able to forward the caller to a language line or to an in-house interpreter who can provide assistance);*
  3. *Instructions to customer service staff and others who regularly respond to written communication from the public on how to respond to written communication from an LEP person. (Ideally, the agency staff person will be able to forward the correspondence to a translator who can translate the document into English and translate the agency's response into the native language);*
  4. *Instructions to vehicle operators, station managers, and others who regularly interact with the public on how to respond to an LEP customer;*
  5. *Policies on how the agency will ensure the competency of interpreters and translation services. Such policies could include the following provisions:*
    - *The agency will ask the interpreter or translator to demonstrate that he or she can communicate or translate information accurately in both English and the other language;*
    - *The agency will train the interpreter or translator in specialized terms and concepts associated with the agency's policies and activities;*
    - *The agency will instruct the interpreter or translator that he or she should not deviate into a role as counselor, legal advisor, or any other role aside from interpreting or translator;*
    - *The agency will ask the interpreter or translator to attest that he or she does not have a conflict of interest on the issues that they would be providing interpretation services.*

### **Task 3: Training Staff**

CCCTA Customer Service Staff and bus operators receive training on how to work with LEP customers as a part of their basic training.

## Attachment 3

*In this part of the language assistance plan, agencies should describe the training that is conducted to ensure that appropriate staff members know about LEP policies and procedures and are ready to provide assistance.*

### **Task 4: Providing Notice to LEP Persons**

#### **Task 4, Step 1: Inventory the existing public service announcements and community outreach the agency currently performs.**

CCCTA currently has the following LEP public service announcements and community outreach activities:

- CCCTA produces major customer information documents in both English and Spanish.
- All of the CCCTA web pages may be translated using online tools.
- CCCTA provides bilingual (Spanish speaking) staff at public hearings and neighborhood meetings.
- All public timetables include a note in Spanish on how to use the language line to get transit information.
- System maps and riders guides are printed in both English and Spanish.

*Transit agencies typically communicate to the public through one or more of the following methods:*

- *Signs and handouts available in vehicles and at stations*
- *Announcements in vehicles and at stations*
- *Agency websites*
- *Customer service lines*
- *Press releases*
- *Newspaper, radio, and television advertisements*
- *Announcements and community meetings.*
- *Information tables at local events.*

*Some of these communications tools are geared towards riders who are using the system, while other methods are intended to reach members of the public at large, who may or may not use the transit system. Both methods can be used to inform people of the availability of language assistance.*

**Task 4, Step 2: Incorporate notice of the availability of language assistance into existing outreach methods**

CCCTA currently provides the riders guide and system map in both English and Spanish. All public timetables include a note in Spanish that explains how to use the language line service to get additional transit information.

*Agencies should consider developing non-English outreach documents that notify people of the availability of language assistance and incorporating this outreach into the public relations materials routinely disseminated by the agency. Agencies should provide notice of the availability of language assistance on a regular basis, in order to reach the greatest number of potential riders.*

*Agencies might, for example, decide to specify in their plan that where documents are available in languages other than English, the English version will include a notice of such availability translated into other languages in which the document is available.*

**Task 4, Step 3: Conduct targeted community outreach to LEP populations.**

CCCTA has developed good working relationships with community groups, neighborhood groups and advocacy groups who represent the Spanish speaking community in the CCCTA service area. Much of this work was done in conjunction with the development of lifeline transportation plans.

*Targeted community outreach can consist of meeting with agencies that serve LEP populations and attending community meetings and events to inform people of the agency's service in general and that language assistance is available. Your agency may wish to partner with its existing community contacts and other agencies that are seen by your audience as credible and trusted to notify the LEP population of the availability of language services. Notification can also be distributed through programs used by LEP persons, such as English classes for speakers of other languages.*

**Task 5: Monitoring and Updating the LEP Plan**

CCCTA is currently monitors and updates its LEP Plan by reviewing customer comments and complaints related to its language assistance activities. In addition, the CCCTA Advisory Committees and Transit Ambassadors review and comment on language assistance activities. Public hearings and community outreach meetings also provide an opportunity for riders and residents to give input on methods used to target LEP populations. The customer service staff provides feedback on the language translation service effectiveness and the frequency of its use. It has not been necessary to shift the emphasis of language effectiveness in response to shifts in the population, however when a change occurs CCCTA will respond.

*How frequently an agency should consult with community organizations representing LEP persons as well as the staff that is responsible for providing language assistance*

### Attachment 3

*will depend on the size and complexity of the agency's LEP program as well as the resources available to the transit provider. Agency staff can combine meetings to obtain feedback on its language assistance program with regularly scheduled community outreach events as well as regularly scheduled staff meetings.*

*Transit agencies should consider conducting follow-up meetings and focus groups or surveys with the community organizations and individuals they contacted in order to develop their needs assessment. This outreach would allow agency staff to determine if there have been any noticeable changes in the demographics of the LEP population in their service area, to receive input on whether their language assistance measures and efforts to inform the LEP community of the availability of language assistance are working, and to continue to inform the LEP community of new or updated language assistance.*

*Agencies should also meet with staff that are in contact with LEP persons to determine whether the written and oral assistance measures are effective. Agency staff may also be in a position to comment on whether the numbers of LEP persons they have encountered are increasing or decreasing and whether they are interacting more frequently with members of a particular language group.*

*Agencies can conduct internal monitoring of their system to determine whether language assistance measures and staff training programs are working. Such monitoring might be best accomplished if the monitors pose as riders and observe how agency staff respond to their requests. Agencies can work with multilingual staff or community members to determine if employees are responding appropriately to requests made with limited English or in a language other than English. Section 4 of Section IV provides an internal monitoring template.*

*Based on the feedback received from community members and agency employees, agencies will likely need to make incremental changes to the type of written and oral language assistance provided as well as to their staff training and community outreach programs. Agencies may take into account the cost of proposed changes and the resources available to them. Depending on their evaluation, agencies may choose to disseminate more widely those language assistance measures that are particularly effective or modify or eliminate those measures that have not been effective.*

*Transit agencies that are expanding service into areas with high concentrations of LEP persons should consider modifying their implementation plan to provide language assistance measures to areas not previously served by the agency.*



# **Central Contra Costa Transit Authority**

## **Concord, California**

### **Title VI Complaint Procedure**

The Central Contra Costa Transit Authority (CCCTA) has in place a Title VI Complaint Procedure, which outlines a process for local investigation of Title VI complaints and is consistent with the guidelines found in the Federal Transit Administration Circular 4702.1A, effective May 14, 2007. This complaint procedure will be evaluated as needed.

The complaint procedure has the following five steps:

1. **Submission of the Complaint:** Any person who feels that he or she, individually, or as a member of any class of persons, on the basis of race, color, national origin, age, sex, disability, religion, or low-income status has been excluded from or denied the benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance through CCCTA may file a written complaint with the CCCTA Manager of Planning and Service Development. Such complaint must be filed within 60 calendar days after the date the person believes the discrimination occurred.
2. **Referral to the Review Officer:** Upon receipt of the Complaint the Manager of Planning and Service Development shall appoint one or more staff review officers, as appropriate, to evaluate and investigate the Complaint, in consultation with the CCCTA General Counsel. The staff review officer(s) shall complete their review no later than 45 calendar days after the date the CCCTA received the Complaint. If more time is required, the Manager of Planning and Service Development shall notify the Complainant of the estimated time frame for completing the review. Upon completion of the review, the staff review officer(s) shall make a recommendation regarding the merit of the Complaint and whether remedial actions are available to provide redress. Additionally, the staff review officer(s) may recommend improvements to the CCCTA's processes relative to Title VI and environmental justice, as appropriate. The staff review officer(s) shall forward their recommendations to the Manager of Planning and Service Development, for concurrence. If the Manager of Planning and Service Development concurs, he or she shall issue the CCCTA's written response to the Complainant.
3. **Request for Reconsideration:** If the Complainant disagrees with the Manager of Planning and Service Development's response, he or she may request reconsideration by submitting he request, in writing to the General Manager or the General Manager's Designee within 10 calendar days after receipt of the Manager of Planning and Service Development's response. The request for reconsideration shall be sufficiently detailed to contain any items the Complainant feels were not fully understood by the Manager of Planning and Service Development. The

Attachment 4

General Manager or General Manager's Designee will notify the Complainant of the decision either to accept or reject the request for reconsideration within 10 calendar days. In cases where the General Manager or General Manager's Designee agrees to reconsider, the matter shall be returned to the staff review officer(s) to re-evaluate in accordance with section 2, above.

4. Appeal: If the request for reconsideration is denied, the Complainant may also submit a complaint to the U.S. Department of Transportation for investigation at Federal Transit Administration (FTA) Region IX headquarters, to the following address:

Attn: Civil Rights Officer  
201 Mission Street  
Suite 1650  
San Francisco, CA 94105

Telephone: (415) 744-3133  
FAX: (415) 744-2726

In accordance with Chapter IX, Title VI Discrimination Complaints, of FTA Circular 4702.1A, such a complaint must be submitted within 180 calendar days after the date of the alleged discrimination. Chapter IX of the FTA Circular 4702.1A, which outlines the complaint process to the Department of Transportation may be obtained by requesting a copy from CCCTA at (925) 676-1976.

5. For more information via the internet go to:  
[www.fta.dot.gov/civilrights/civil\\_rights\\_5088.html](http://www.fta.dot.gov/civilrights/civil_rights_5088.html).

---

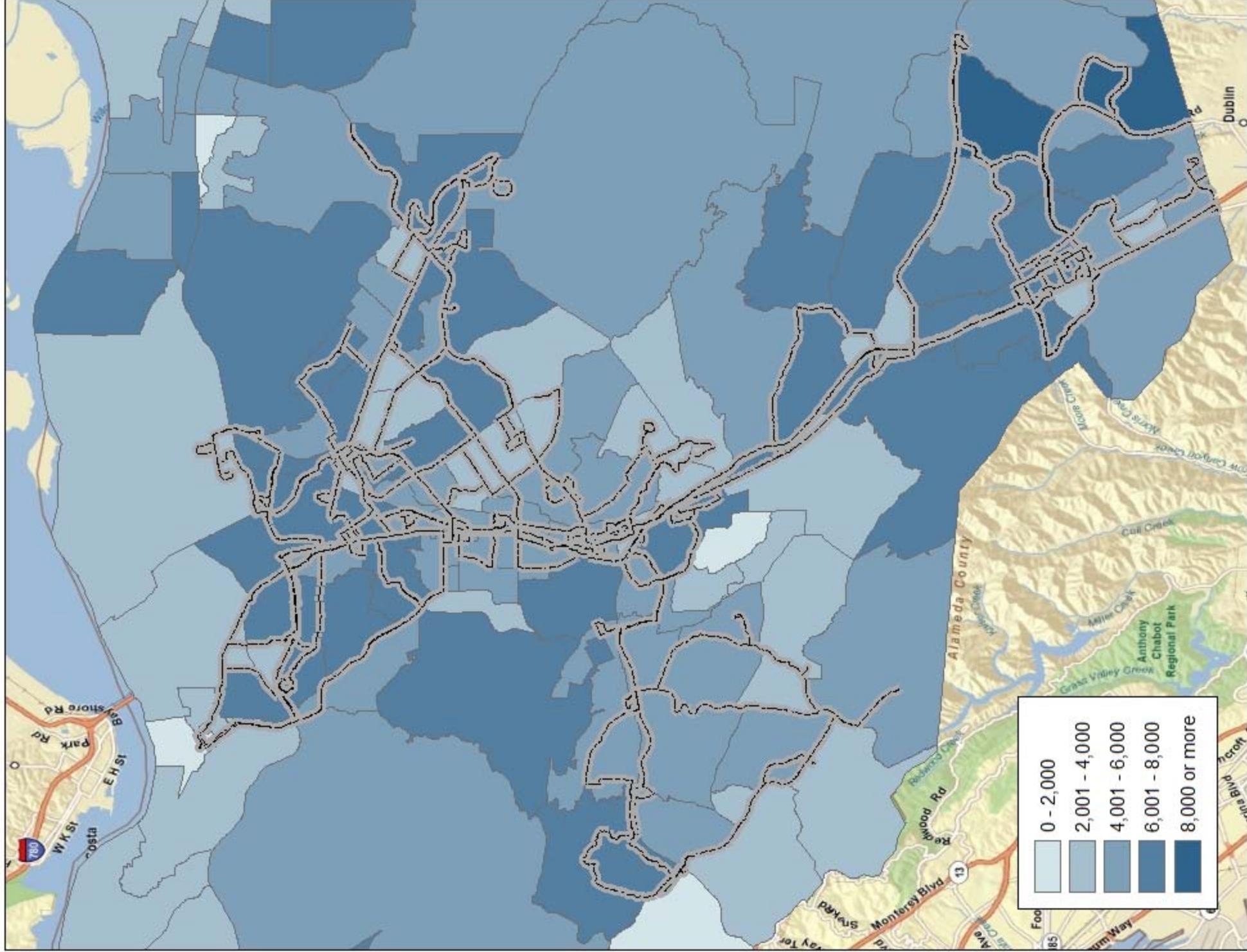
Laramie Bowron  
Manager of Planning  
The County Connection (CCCTA)

---

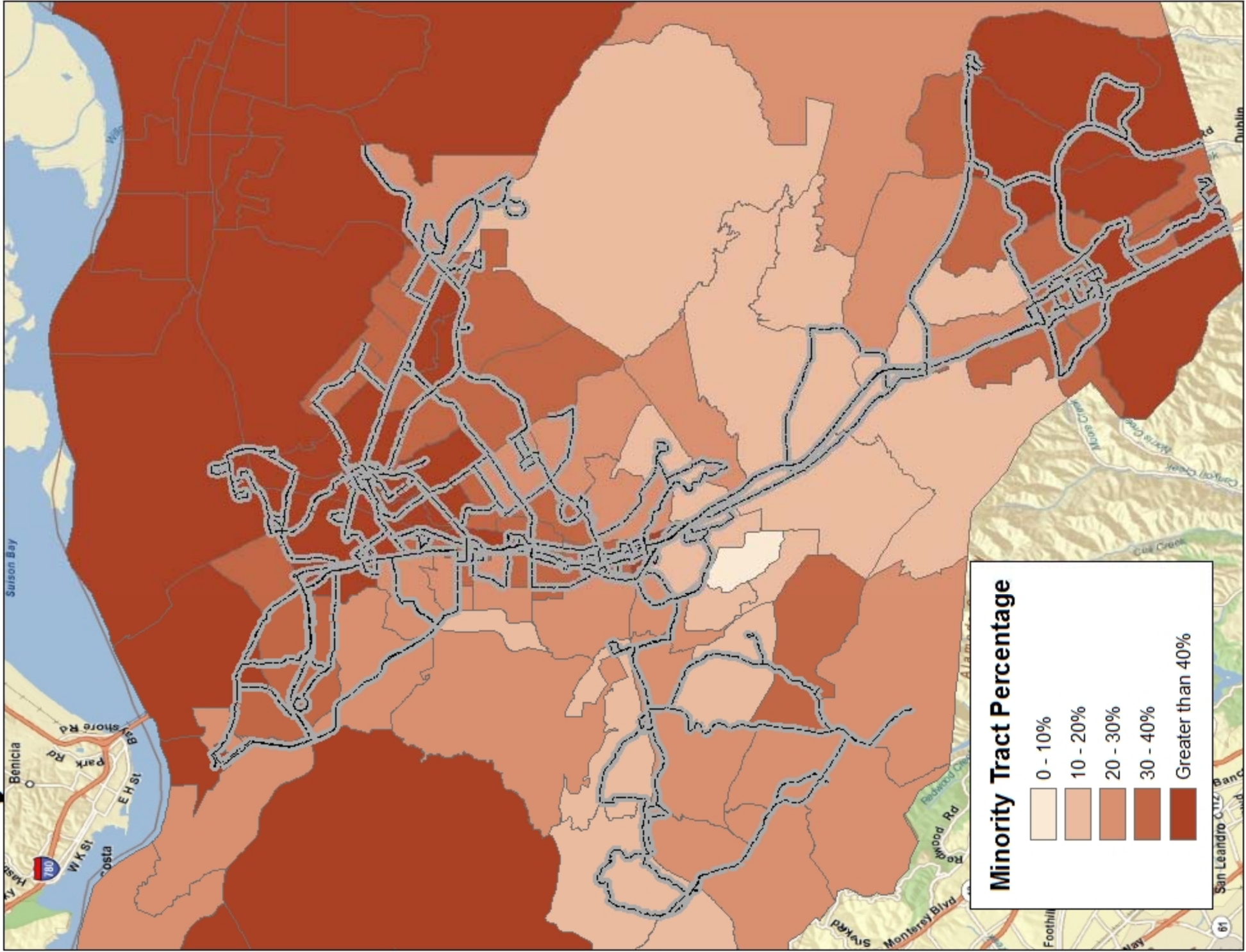
1/12/2012

Date

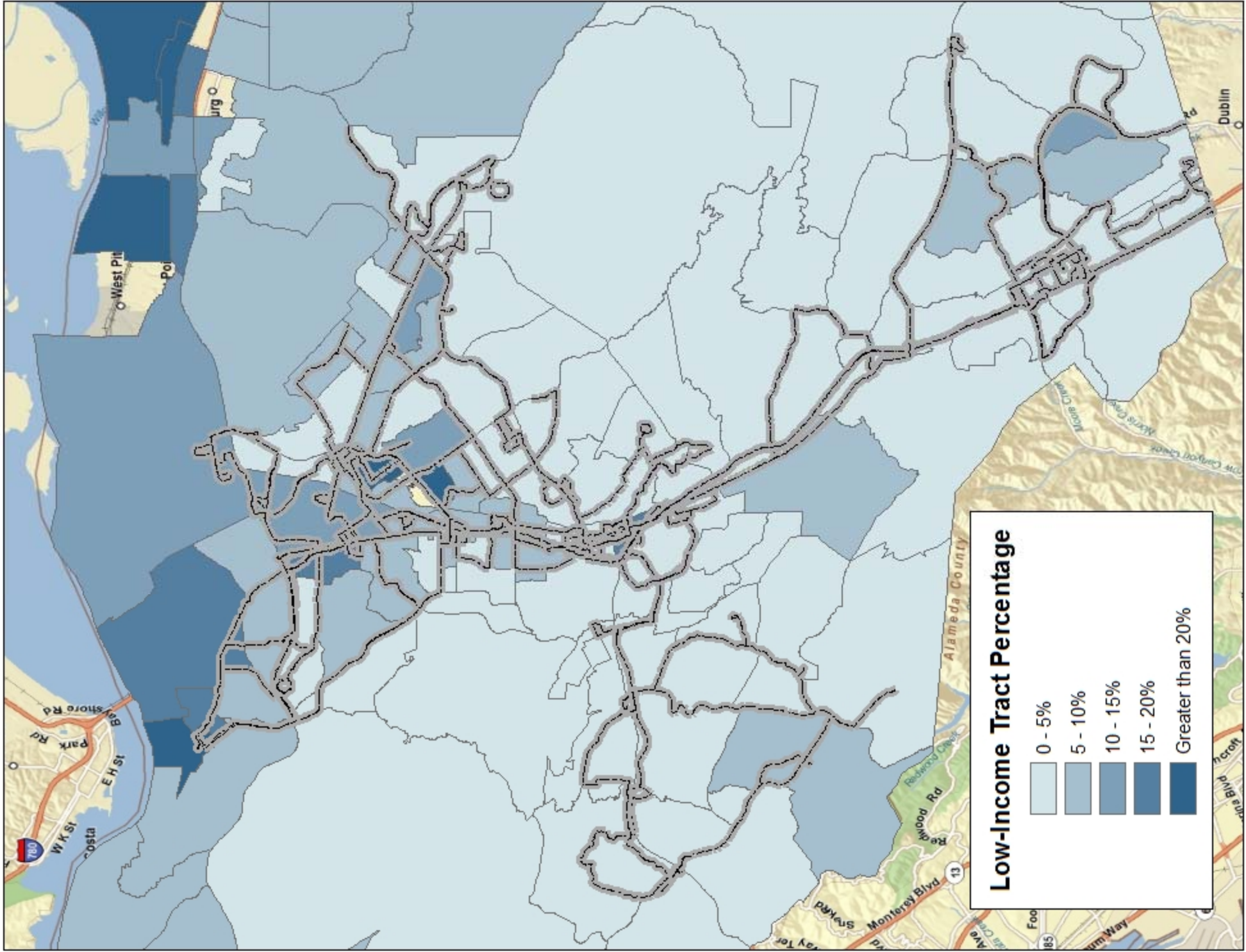
# Total Population



# Minority Census Tracts



# Low-Income Census Tracts



## Census Tracts within CCCTA's Service Area / Minority Census Tract Determination

	Total Population	White	Black or African American	American Indian and Alaska Native	Asian	Native Hawaiian and Other Pacific Islander	Hispanic or Latino	Minority Pop	Minority %
County Total	1,049,025	500,923	93,604	2,984	148,881	4,382	255,560	548,102	52.2%
CCCTA Share	519,575	326,728	13,338	1,157	78,750	1,601	77,042	192,847	37.1%

Census Tract	Total Population	White	Black or African American	American Indian and Alaska Native	Asian	Native Hawaiian and Other Pacific Islander	Hispanic or Latino	Minority Pop	Minority %	Minority Tract
3132.04	5,542	1,561	690	15	525	69	2,494	3,981	72%	Minority Tract
3150	3,281	1,450	245	19	624	23	755	1,831	56%	Minority Tract
3160	1,483	776	279	12	39	13	310	707	48%	Minority Tract
3170	2,144	1,597	50	8	69	7	326	547	26%	
3180	3,267	2,371	94	25	80	17	500	896	27%	
3190	7,412	5,105	192	46	364	38	1,354	2,307	31%	
3200.01	3,615	1,909	93	25	177	35	1,203	1,706	47%	Minority Tract
3200.03	2,805	1,844	63	19	369	3	327	961	34%	
3200.04	6,216	4,082	214	36	661	13	932	2,134	34%	
3211.01	6,549	4,418	318	10	527	11	992	2,131	33%	
3211.02	6,689	4,781	86	10	811	14	702	1,908	29%	
3211.03	4,518	3,467	59	15	321	5	466	1,051	23%	
3212	5,533	2,794	160	18	1,509	10	796	2,739	50%	Minority Tract
3220	6,085	4,269	85	12	788	4	690	1,816	30%	
3230	4,352	3,258	31	16	323	3	534	1,094	25%	
3240.01	4,615	2,650	175	11	899	19	622	1,965	43%	Minority Tract
3240.02	5,141	3,129	186	6	738	18	864	2,012	39%	Minority Tract
3250	5,514	4,204	98	12	352	7	601	1,310	24%	
3260	3,437	2,804	26	4	211	6	269	633	18%	
3270	6,695	3,507	272	25	452	44	2,137	3,188	48%	Minority Tract
3280	2,281	1,114	151	15	404	12	500	1,167	51%	Minority Tract
3290	6,309	3,140	171	21	487	68	2,158	3,169	50%	Minority Tract
3300	5,353	2,980	130	25	440	62	1,511	2,373	44%	Minority Tract
3310	7,013	4,047	198	22	779	43	1,659	2,966	42%	Minority Tract
3320	7,534	4,766	150	25	594	37	1,640	2,768	37%	
3331.01	4,091	2,504	100	22	449	15	818	1,587	39%	Minority Tract
3331.02	3,855	2,406	104	5	489	5	681	1,449	38%	Minority Tract
3332	5,926	3,771	141	13	595	22	1,166	2,155	36%	
3340.01	3,749	2,300	110	18	346	6	763	1,449	39%	Minority Tract
3340.04	7,367	3,963	305	20	1,106	27	1,563	3,404	46%	Minority Tract
3340.06	4,767	2,859	82	19	950	8	570	1,908	40%	Minority Tract
3342	6,794	5,489	88	5	540	16	421	1,305	19%	
3350	3,358	2,005	67	12	239	5	899	1,353	40%	Minority Tract
3361.01	4,802	629	329	9	342	29	3,347	4,173	87%	Minority Tract
3361.02	7,595	1,279	424	29	653	71	4,936	6,316	83%	Minority Tract
3362.01	4,032	1,187	102	5	398	46	2,205	2,845	71%	Minority Tract
3362.02	5,701	641	201	7	280	66	4,399	5,060	89%	Minority Tract
3371	3,200	1,981	64	5	407	47	560	1,219	38%	Minority Tract
3372	7,183	4,110	305	25	832	33	1,543	3,073	43%	Minority Tract
3373	6,098	4,148	98	9	1,006	8	565	1,950	32%	
3381.01	4,996	1,792	247	12	571	29	2,104	3,204	64%	Minority Tract
3381.02	3,601	2,348	54	11	411	15	572	1,253	35%	
3382.01	3,790	2,654	37	10	515	21	393	1,136	30%	
3382.03	4,564	2,960	134	11	789	25	435	1,604	35%	
3382.04	5,662	3,949	80	9	990	14	419	1,713	30%	
3383.01	2,922	2,199	15	7	463	1	162	723	25%	
3383.02	5,807	4,360	48	12	755	10	371	1,447	25%	
3390.01	3,362	1,907	155	1	569	8	570	1,455	43%	Minority Tract
3390.02	5,574	3,750	147	8	735	10	705	1,824	33%	
3400.01	5,857	3,860	127	18	717	6	884	1,997	34%	
3400.02	7,000	5,418	60	18	709	7	521	1,582	23%	
3410	4,864	3,688	56	10	450	10	436	1,176	24%	
3430.01	4,806	3,511	51	3	349	8	700	1,295	27%	
3430.02	4,380	3,381	84	8	453	7	302	999	23%	
3430.03	3,843	3,186	39	3	271	1	222	657	17%	
3451.01	5,730	3,384	142	7	1,150	6	787	2,346	41%	Minority Tract
3451.02	3,895	2,624	84	2	537	4	498	1,271	33%	
3451.03	5,062	3,356	73	16	927	18	489	1,706	34%	
3451.05	6,223	4,805	45	8	565	8	548	1,418	23%	
3451.08	7,353	4,494	154	15	1,800	14	578	2,859	39%	Minority Tract
3451.11	5,099	2,453	133	18	1,856	10	478	2,646	52%	Minority Tract
3451.12	6,513	3,186	219	11	2,264	5	520	3,327	51%	Minority Tract
3451.13	4,337	2,953	53	1	904	2	254	1,384	32%	
3451.14	6,307	5,233	50	5	507	15	342	1,074	17%	
3451.15	5,734	3,339	123	8	1,535	13	474	2,395	42%	Minority Tract
3451.16	2,859	1,858	32	5	480	25	318	1,001	35%	
3452.02	7,816	4,811	255	12	1,576	12	758	3,005	38%	Minority Tract
3452.03	6,472	5,338	39	12	340	17	523	1,134	18%	

## Census Tracts within CCCTA's Service Area / Minority Census Tract Determination

3452.04	3,586	3,126	7	3	182	-	179	460	13%	
3461.01	3,433	2,717	30	2	416	1	180	716	21%	
3461.02	5,650	4,567	32	2	549	5	330	1,083	19%	
3462.01	7,181	6,129	36	5	436	4	357	1,052	15%	
3462.03	3,838	3,188	17	2	263	3	234	650	17%	
3462.04	7,278	5,525	51	16	903	9	435	1,753	24%	
3470	6,171	4,809	85	6	620	4	407	1,362	22%	
3480	4,587	3,803	20	6	384	2	201	784	17%	
3490	4,686	3,619	41	8	459	10	370	1,067	23%	
3500	5,512	4,107	74	9	659	5	395	1,405	25%	
3511.02	3,635	3,228	19	7	223	11	99	407	11%	
3511.03	1,846	1,680	8	-	119	3	22	166	9%	
3512	5,812	4,851	21	10	456	3	265	961	17%	
3521.01	3,141	2,118	113	7	408	10	321	1,023	33%	
3521.02	5,586	4,179	70	5	675	7	409	1,407	25%	
3522.01	5,750	4,076	70	5	986	12	369	1,674	29%	
3522.02	2,548	1,954	10	3	372	4	99	594	23%	
3530.01	3,521	2,673	37	3	476	10	185	848	24%	
3530.02	4,078	3,209	21	7	474	3	200	869	21%	
3540.01	1,859	1,514	21	2	154	-	69	345	19%	
3540.02	6,590	5,462	44	3	581	4	247	1,128	17%	
3551.12	5,563	4,273	115	14	642	2	345	1,290	23%	
3551.13	4,985	3,233	90	8	1,176	7	264	1,752	35%	
3551.14	11,035	5,228	221	6	4,293	14	779	5,807	53%	Minority Tract
3551.15	4,443	1,453	426	12	1,779	15	484	2,990	67%	Minority Tract
3551.16	5,664	1,323	101	4	3,708	3	246	4,341	77%	Minority Tract
3551.17	8,379	1,704	156	11	5,790	8	365	6,675	80%	Minority Tract
3552	7,444	1,438	811	12	2,995	69	1,752	6,006	81%	Minority Tract
3553.01	7,833	5,124	144	14	1,079	32	1,070	2,709	35%	
3553.02	3,484	2,410	40	5	651	-	220	1,074	31%	
3553.04	7,831	5,990	127	24	610	9	755	1,841	24%	
3553.06	4,922	3,999	50	13	207	8	487	923	19%	
3560.02	5,375	1,927	758	7	1,662	18	761	3,448	64%	Minority Tract

# ***Census Tracts within CCCTA's Service Area / Low-Income Tract Determination***

	Population for whom poverty status is determined total	Population for whom poverty status is determined below poverty level	Poverty %
County Total	1,013,854	91,142	9.0%
CCCTA Share	503,165	28,458	5.7%

Census Tract	Population for whom poverty status is determined total	Population for whom poverty status is determined below poverty level	Poverty	Low Income Tract
3132.04	5,438	523	9.6%	Low Income Tract
3150	3,535	498	14.1%	Low Income Tract
3160	552	129	23.4%	Low Income Tract
3170	1,970	326	16.5%	Low Income Tract
3180	3,098	292	9.4%	Low Income Tract
3190	7,154	710	9.9%	Low Income Tract
3200.01	3,499	617	17.6%	Low Income Tract
3200.03	2,590	184	7.1%	Low Income Tract
3200.04	5,861	379	6.5%	Low Income Tract
3211.01	6,073	271	4.5%	
3211.02	6,638	408	6.1%	Low Income Tract
3211.03	4,812	226	4.7%	
3212	5,415	999	18.4%	Low Income Tract
3220	6,181	339	5.5%	
3230	4,250	125	2.9%	
3240.01	4,431	301	6.8%	Low Income Tract
3240.02	5,283	344	6.5%	Low Income Tract
3250	5,511	231	4.2%	
3260	3,413	162	4.7%	
3270	6,557	901	13.7%	Low Income Tract
3280	2,361	180	7.6%	Low Income Tract
3290	6,045	174	2.9%	
3300	5,804	169	2.9%	
3310	7,008	326	4.7%	
3320	7,886	765	9.7%	Low Income Tract
3331.01	3,976	114	2.9%	
3331.02	4,460	368	8.3%	Low Income Tract
3332	5,965	414	6.9%	Low Income Tract
3340.01	3,637	184	5.1%	
3340.04	6,812	725	10.6%	Low Income Tract
3340.06	5,000	290	5.8%	Low Income Tract
3342	6,731	300	4.5%	
3350	3,693	239	6.5%	Low Income Tract
3361.01	4,161	865	20.8%	Low Income Tract
3361.02	7,297	1,553	21.3%	Low Income Tract
3362.01	3,662	208	5.7%	Low Income Tract
3362.02	5,367	1,477	27.5%	Low Income Tract
3371	2,999	68	2.3%	
3372	6,727	910	13.5%	Low Income Tract
3373	6,194	165	2.7%	
3381.01	4,052	825	20.4%	Low Income Tract
3381.02	3,959	224	5.7%	Low Income Tract
3382.01	3,661	148	4.0%	
3382.03	4,983	367	7.4%	Low Income Tract
3382.04	5,222	184	3.5%	
3383.01	2,805	139	5.0%	



# ***Census Tracts within CCCTA's Service Area / Low-Income Tract Determination***

3383.02	5,715	151	2.6%	
3390.01	3,754	683	18.2%	Low Income Tract
3390.02	5,203	241	4.6%	
3400.01	5,275	332	6.3%	Low Income Tract
3400.02	6,956	103	1.5%	
3410	4,858	57	1.2%	
3430.01	4,925	230	4.7%	
3430.02	4,873	167	3.4%	
3430.03	3,848	78	2.0%	
3451.01	5,545	159	2.9%	
3451.02	4,105	45	1.1%	
3451.03	5,521	84	1.5%	
3451.05	6,149	195	3.2%	
3451.08	6,978	265	3.8%	
3451.11	5,516	61	1.1%	
3451.12	5,425	328	6.0%	Low Income Tract
3451.13	4,203	282	6.7%	Low Income Tract
3451.14	6,118	163	2.7%	
3451.15	5,445	14	0.3%	
3451.16	3,080	15	0.5%	
3452.02	8,115	222	2.7%	
3452.03	6,174	304	4.9%	
3452.04	3,775	323	8.6%	Low Income Tract
3461.01	3,441	64	1.9%	
3461.02	5,673	171	3.0%	
3462.01	7,470	119	1.6%	
3462.03	3,864	170	4.4%	
3462.04	7,206	344	4.8%	
3470	5,893	88	1.5%	
3480	4,615	160	3.5%	
3490	4,618	169	3.7%	
3500	5,247	152	2.9%	
3511.02	3,572	127	3.6%	
3511.03	1,946	29	1.5%	
3512	5,901	105	1.8%	
3521.01	2,074	99	4.8%	
3521.02	4,806	16	0.3%	
3522.01	5,552	317	5.7%	Low Income Tract
3522.02	2,268	191	8.4%	Low Income Tract
3530.01	3,544	78	2.2%	
3530.02	3,990	41	1.0%	
3540.01	1,706	20	1.2%	
3540.02	6,426	147	2.3%	
3551.12	5,226	140	2.7%	
3551.13	5,027	15	0.3%	
3551.14	10,412	270	2.6%	
3551.15	3,016	325	10.8%	Low Income Tract
3551.16	3,709	44	1.2%	
3551.17	6,514	75	1.2%	
3552	5,851	334	5.7%	Low Income Tract
3553.01	7,804	251	3.2%	
3553.02	3,538	43	1.2%	
3553.04	7,722	173	2.2%	
3553.06	4,778	158	3.3%	
3560.02	5,472	175	3.2%	

Minority Route Determination						
Route	Miles			Route Determination	Hours	
	Total	Minority	Non-Minority		Minority	Non-Minority
1	13.19	0.03	13.17		0.27	137.31
2	7.36	1.17	6.19		8.18	43.41
4	2.90	0.75	2.14		59.42	168.65
5	5.52	2.59	2.94	Minority Route	25.56	29.02
6	15.48	0.00	15.48		0.00	189.67
7	15.14	0.81	14.33		9.85	174.82
9	14.21	6.71	7.50	Minority Route	105.94	118.31
10	16.43	9.44	6.99	Minority Route	114.65	84.85
11	10.91	6.82	4.09	Minority Route	61.45	36.89
14	8.17	4.81	3.37	Minority Route	119.34	83.57
15	19.28	7.44	11.84	Minority Route	59.87	95.22
16	19.81	8.40	11.41	Minority Route	115.15	156.35
17	8.11	8.11	0.00	Minority Route	98.42	0.00
18	19.80	10.32	9.48	Minority Route	87.01	79.91
19	14.12	11.90	2.22	Minority Route	61.11	11.39
20	6.58	5.57	1.02	Minority Route	222.70	40.64
21	17.47	5.64	11.83		87.69	183.98
25	10.09	0.31	9.78		1.86	58.97
28	23.43	14.48	8.94	Minority Route	95.94	59.23
35	19.67	19.04	0.63	Minority Route	196.85	6.48
36	17.13	14.20	2.93	Minority Route	127.79	26.37
91X	6.98	0.00	6.98		0.00	22.58
92X	6.36	4.52	1.84	Minority Route	53.43	21.82
93X	8.28	0.03	8.25		0.33	104.58
95X	9.98	8.81	1.17	Minority Route	65.93	8.74
96X	14.31	7.07	7.24	Minority Route	94.20	96.47
97X	10.93	9.30	1.63	Minority Route	70.28	12.31
98X	7.09	3.97	3.12	Minority Route	77.94	61.40
250	21.92	12.44	9.48	Minority Route	67.99	51.84
260	6.27	6.19	0.08	Minority Route		
301	19.53	7.82	11.71	Minority Route	7.73	11.57
310	10.13	0.03	10.11			
311	11.47	1.17	10.30		3.30	29.10
314	10.01	0.00	10.01		0.00	56.37
315	4.87	2.71	2.16	Minority Route	7.43	5.90
316	19.66	0.00	19.66		0.00	37.77
320	6.34	2.47	3.88	Minority Route	10.05	15.81
321	5.24	0.00	5.24		0.00	38.13
601	16.61	7.58	9.02	Minority Route	14.65	17.43
602	9.22	6.40	2.82	Minority Route	22.49	9.92
603	11.56	8.05	3.51	Minority Route	11.09	4.83
605	3.51	2.96	0.55	Minority Route	16.38	3.03
606	11.24	8.08	3.16	Minority Route	75.70	29.55
608	4.82	2.55	2.28	Minority Route	4.18	3.74
609	8.54	5.72	2.82	Minority Route	3.96	1.96
610	5.23	2.66	2.57	Minority Route	6.18	5.99
611	6.92	5.12	1.81	Minority Route	8.50	3.00
612	21.88	5.02	16.86		2.68	8.99
613	11.55	0.00	11.55		0.00	5.83
614	13.93	0.00	13.93		0.00	11.83
615	3.42	3.42	0.00	Minority Route	7.92	0.00
616	9.21	7.08	2.13	Minority Route	9.80	2.95
619	15.27	11.66	3.61	Minority Route	4.20	1.30
622	3.52	3.46	0.06	Minority Route	7.21	0.13
623	5.11	5.11	0.00	Minority Route	11.75	0.00
625	41.66	14.38	27.27	Minority Route	6.27	11.89
626	23.06	3.85	19.20		2.84	14.16
627	26.09	4.78	21.32		1.30	5.79
635	30.13	9.68	20.45		2.36	4.98
636	11.21	10.20	1.01	Minority Route	21.98	2.18
649	27.23	11.86	15.37	Minority Route	2.61	3.39

Miles		Hours	
Total Minority	Total Non-Minority	Total Minority	Total Non-Minority
43.9%	56.1%	48.5%	51.5%

Weekday Route					
Route	Load Factor	On-Time %	Route	Load Factor	On-Time %
Route #1	0.71	80.3%	Route #97X	0.49	72.8%
Route #2	0.36	58.7%	Route #98X	0.63	83.9%
Route #4	0.88	92.7%	Route #601	1.04	82.9%
Route #5	0.33	69.9%	Route #602	1.18	38.6%
Route #6	0.93	70.8%	Route #603	0.52	48.3%
Route #7	0.55	84.8%	Route #605	0.93	81.6%
Route #9	0.69	75.2%	Route #606	1.35	51.0%
Route #10	1.24	78.0%	Route #608	0.44	75.0%
Route #11	1.07	77.4%	Route #609	0.44	75.0%
Route #14	0.85	83.8%	Route #610	0.30	65.6%
Route #15	0.74	81.4%	Route #611	0.80	83.3%
Route #16	1.04	80.4%	Route #612	0.82	56.7%
Route #17	0.74	82.6%	Route #613	0.60	50.0%
Route #18	0.91	80.4%	Route #614	0.58	66.7%
Route #19	0.58	90.2%	Route #615	0.80	50.0%
Route #20	0.96	83.9%	Route #616	0.27	81.2%
Route #21	1.07	72.7%	Route #619	0.80	100.0%
Route #25	0.33	84.1%	Route #622	0.88	56.2%
Route #28	0.58	72.1%	Route #623	1.57	25.0%
Route #35	0.88	78.7%	Route #625	0.63	90.4%
Route #36	0.58	84.4%	Route #626	0.71	31.0%
Route #91X	0.27	88.9%	Route #627	0.85	91.7%
Route #92X	1.26	64.1%	Route #635	0.38	75.0%
Route #93X	0.99	52.8%	Route #636	1.26	62.1%
Route #95X	1.21	84.3%	Route #649	0.16	96.0%
Route #96X	1.65	70.1%			

Weekend Route		
Route	Load Factor	On-Time %
Route #4	0.70	94.4%
Route #6	0.49	88.1%
Route #301	0.27	74.0%
Route #310	0.70	81.4%
Route #311	0.54	67.6%
Route #314	0.89	76.3%
Route #315	0.29	60.7%
Route #316	0.62	73.0%
Route #320	0.55	83.5%
Route #321	0.70	61.9%

On-Time Performance	
Minority Routes	73.7%
Non-Minority Routes	72.7%
<b>Total</b>	<b>73.3%</b>

Load Factor	
Minority Routes	0.79
Non-Minority Routes	0.67
<b>Total</b>	<b>0.75</b>

## Equity Methodology

### Background:

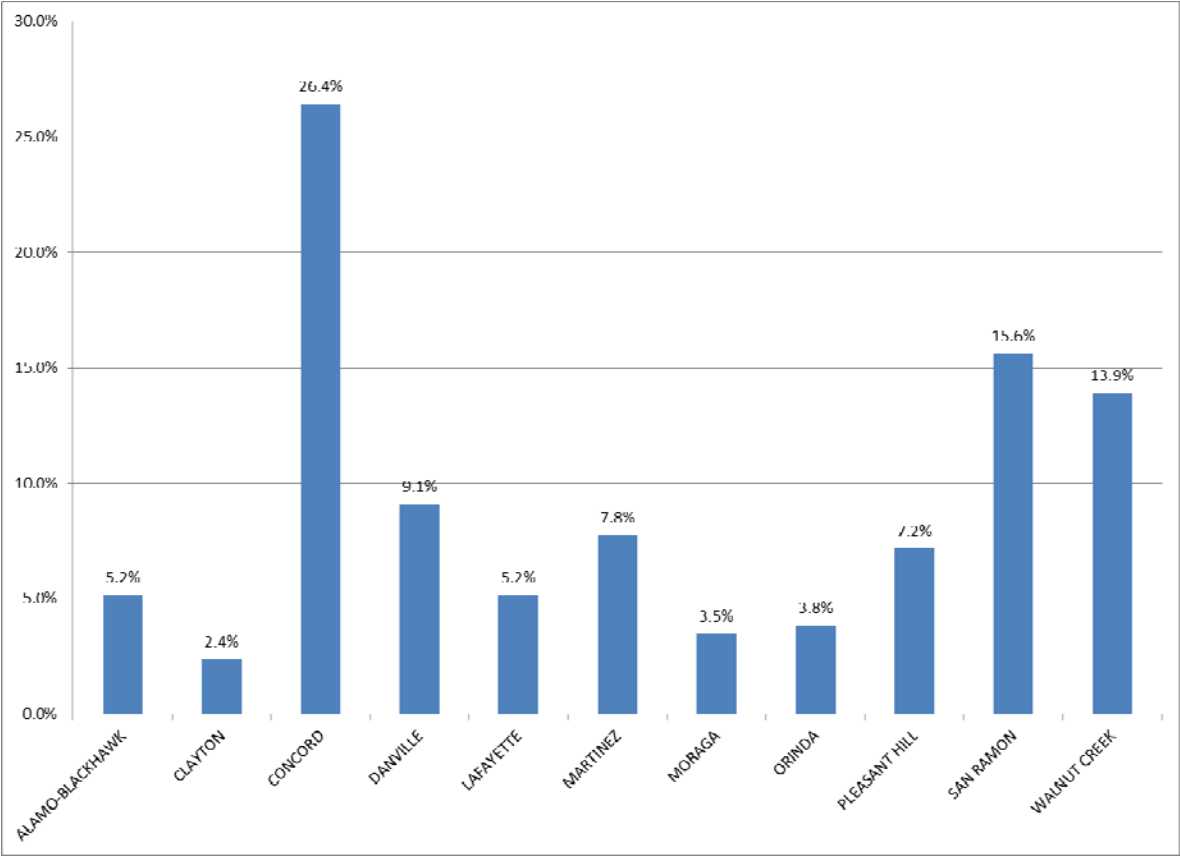
Service equity has been a major issue at the County Connection. The authority is comprised of ten incorporated communities and a significant unincorporated area. There is an interest in making sure that service is allocated fairly in the County Connection service area. There are conflicting goals to provide service based on TDA tax revenue or provide service based on existing demand or provide service based on demographic need. The initial study of this topic looked only at population to determine service equity which is how the Contra Costa County TDA revenue is allocated to transit agencies. The problem with just looking at population to guide transit service decisions is the issue that transit demand and need is not just an issue of total population. This discussion has included the concern that service be based on tax revenue but also be influenced by usage and need. After looking at a variety of methods for distributing service it was decided that population, employment, residential density and demographic factors should be used to evaluate the distribution of service.

### Service Equity Factors:

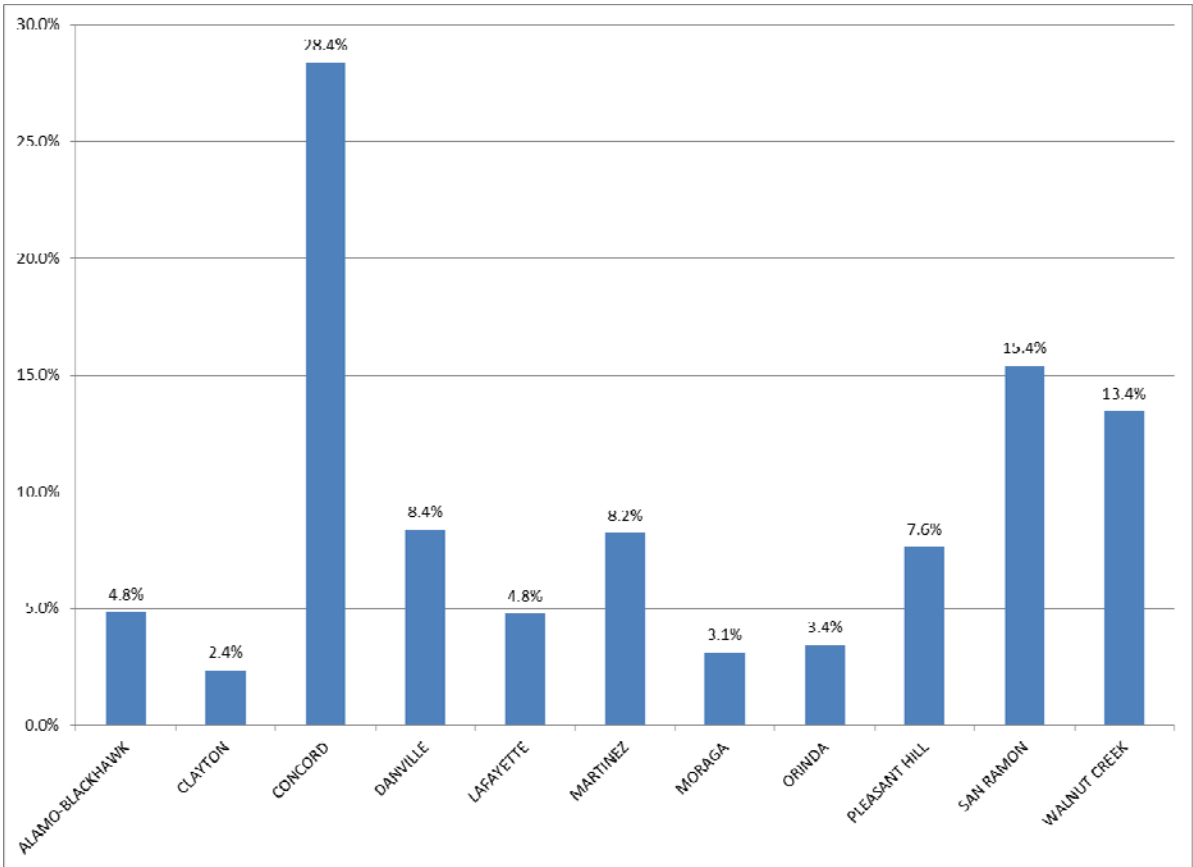
The following factors will be used in the equity analysis. Share of total population, share of total jobs, share of high density residential development, share of low income population, and share of combined youth, senior and disabled population. The data used is from 2000 and 2010 Census data. The data for the ten incorporated cities includes the surrounding unincorporated area, The Alamo/Blackhawk area is treated as an additional jurisdiction. The population of communities outside of the County Connection service area is not counted in this process. Revenue Hours of Service is the measurement of transit service provided. Revenue hours of service outside the County Connection service area were not included in this process. For example, service to Dublin/Pleasanton BART mainly benefits people living or working in San Ramon, and Danville but this service was not included in the revenue hours of service calculations. Due to the location of BART stations, some of the revenue service hours included in the Concord, Pleasant Hill and Walnut Creek totals were the result of sending buses from neighboring cities to the nearest BART station. Service to major traffic generators also influences the distribution of transit service hours. Examples of this include Diablo Valley College leading to higher service hours in Pleasant Hill, and Sun Valley Mall leading to higher service hours in Concord and Pleasant Hill. All of the factors uses in the equity study are based on the percent of the County Connection totals.

**Population Share:** This factor allocates transit service based on the population of the jurisdiction. To some degree the number of transit passengers is a function

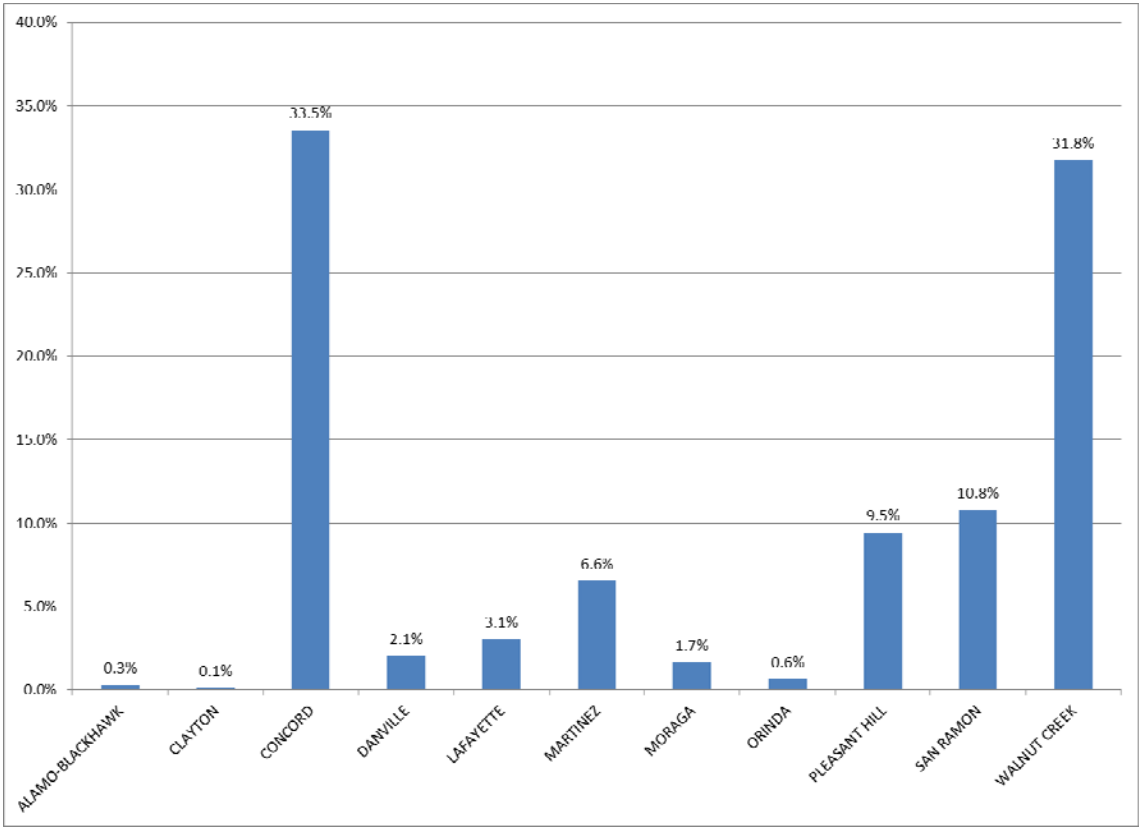
of total population. Concord (26.4%) has the largest population in the County Connection service area, followed by San Ramon (15.6%) and Walnut Creek (13.9%).



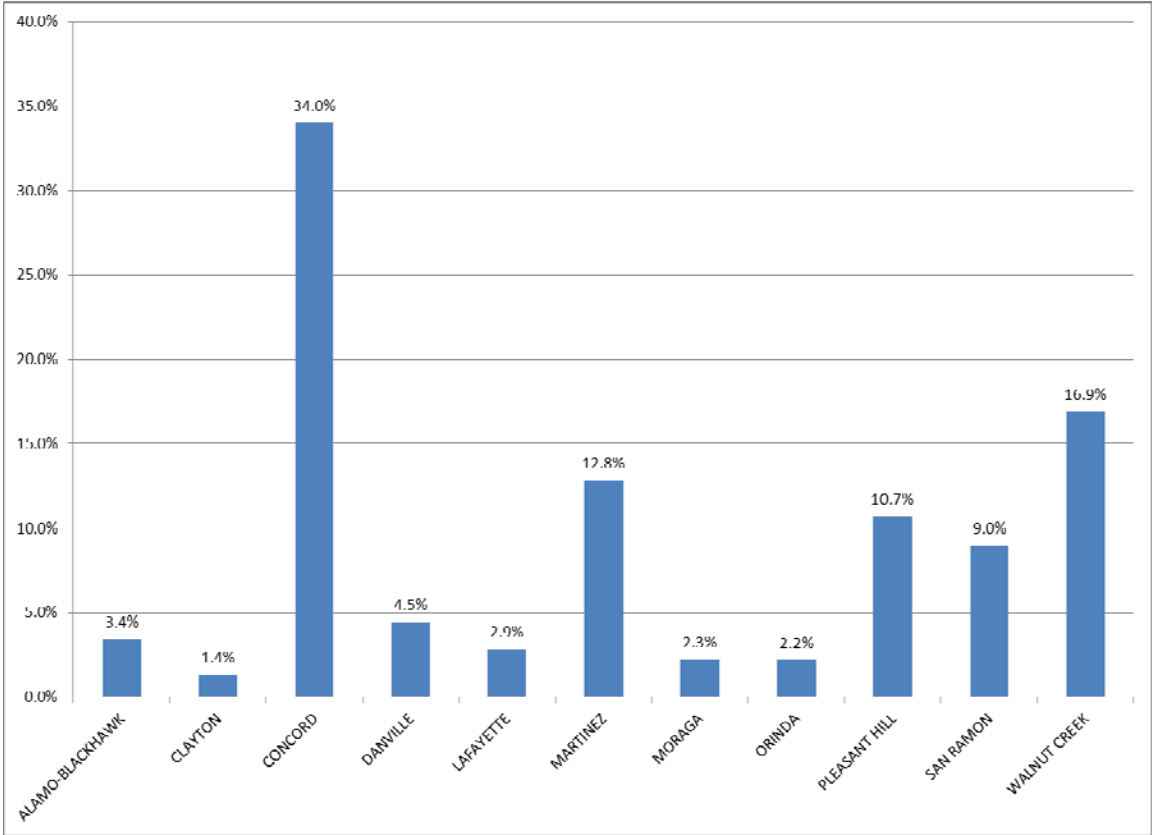
**Employment Share:** This factor considers the share of County Connection service area jobs in each jurisdiction. A community with a large number of jobs will generate more transit trips than a community with a small number of jobs. Jobs generate trips and a portion of these trips will be on transit. There is a benefit to a community if a large percentage of work trips are made on transit even if these transit trips are made by people living outside of the community. Part of this benefit is reduced traffic congestion in the community where the jobs are located. Concord (28.4%) has the largest share of jobs in the County Connection service area followed by San Ramon (15.4%) and Walnut Creek (13.4%).



**Residential Density Share:** This factor considers the number of households that are in developments of three or more units or located in mobile homes. The result is a factor that considers the share of higher residential density development in each jurisdiction of the County Connection service area. Concord (33.5%) has the greatest share of higher density residential development followed by Walnut Creek (31.8%) and San Ramon (10.8%).

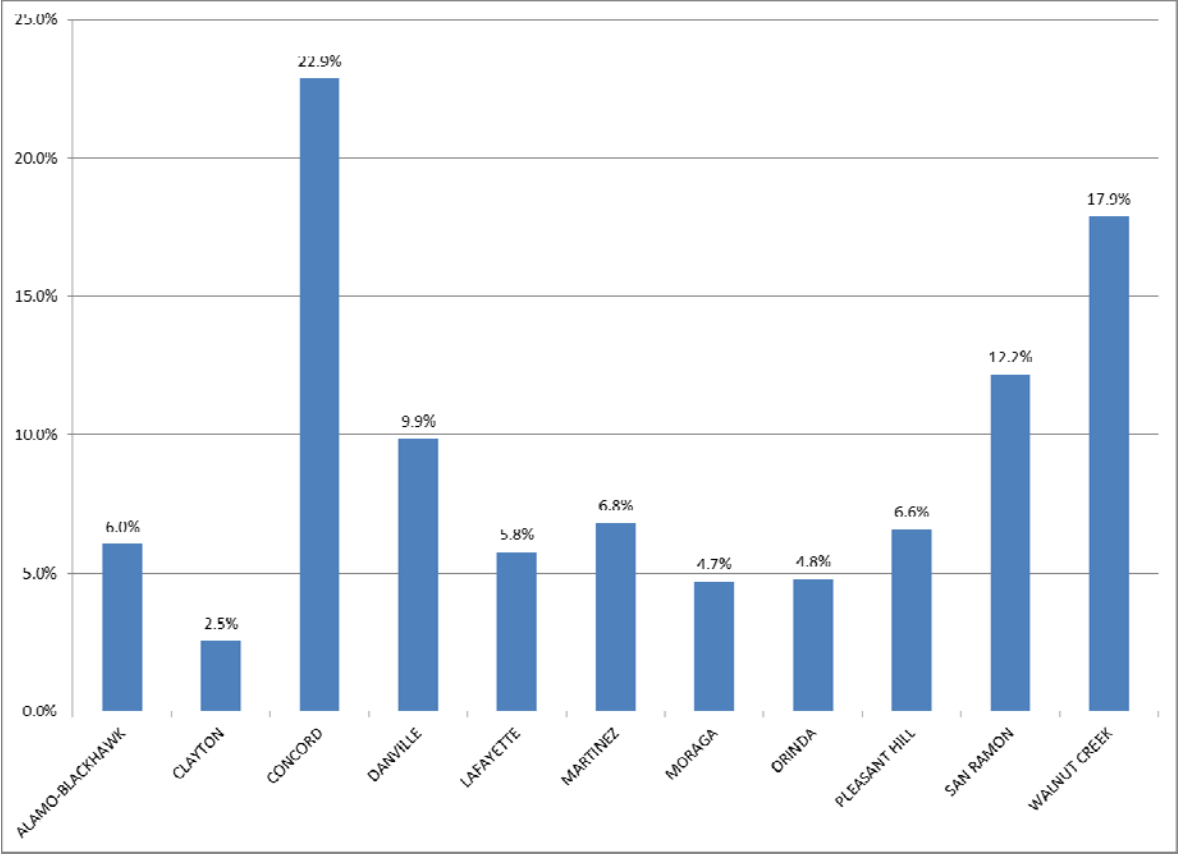


**Low Income Population Share:** People with lower incomes tend to be more dependent on public transportation. This factor is designed to provide more service to those with few other transportation options. For this indicator the percentage of households in the County Connection service area with an income of less than \$15,000 per year was allocated by jurisdiction. Concord (34.0%) has the greatest share of the households with an income under \$15,000, followed by Walnut Creek (16.9%) and Martinez (12.8%).

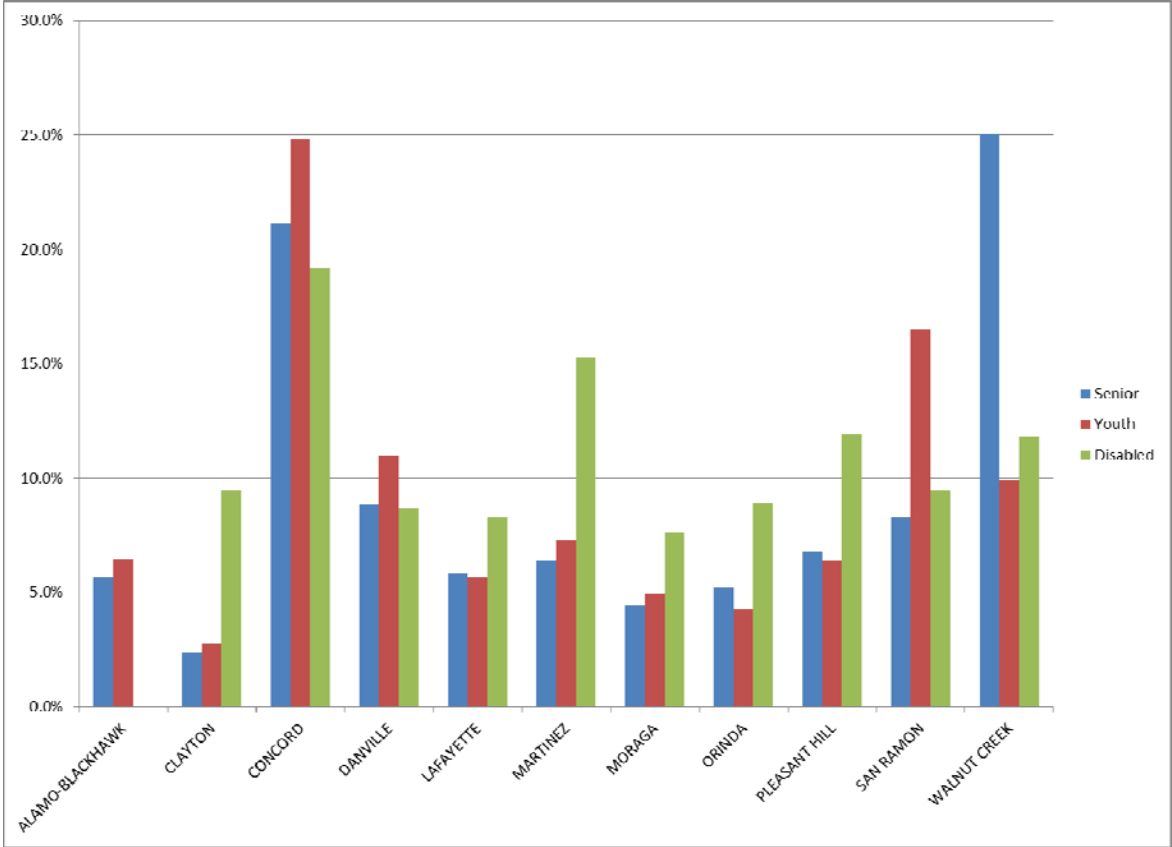




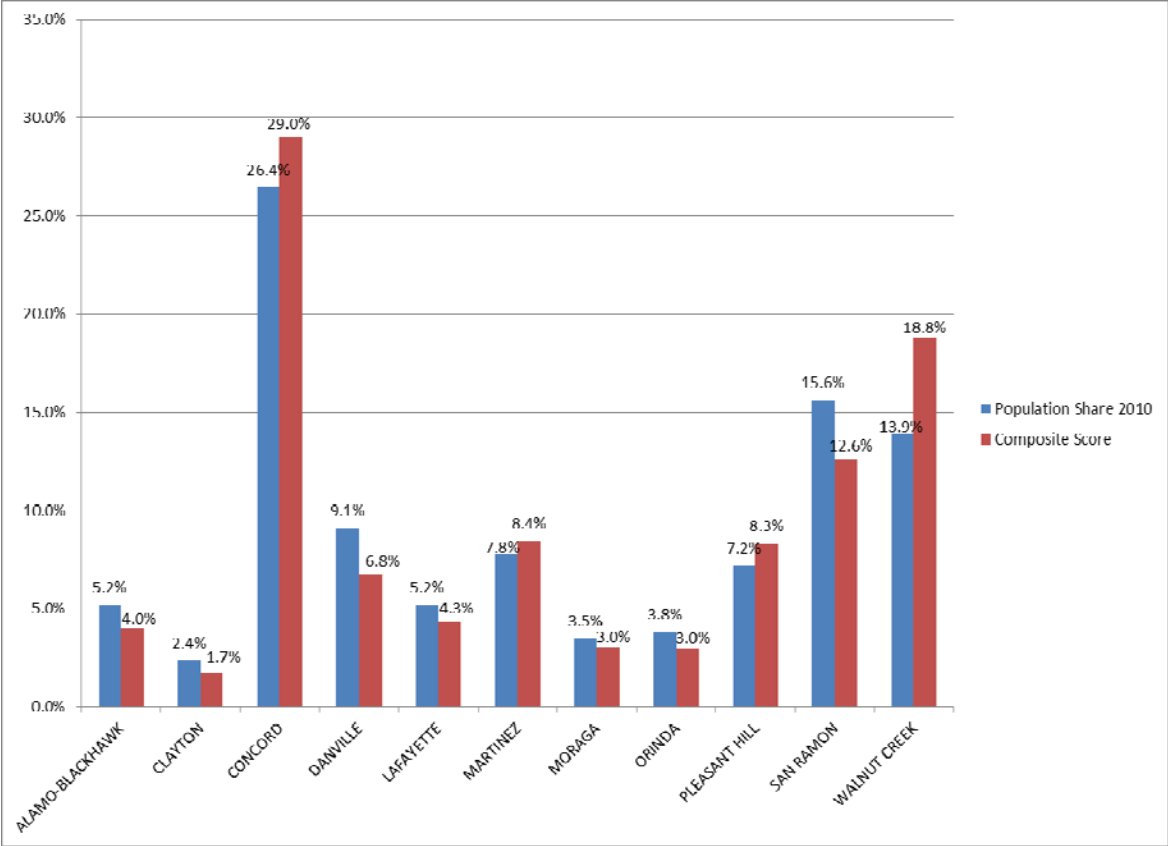
**Senior, Youth, and Disabled Population Share:** This factor combines the senior population (65 and over), youth population (10 to 19), and the disabled population (ages 21 to 64). These groups tend to be transit dependent. Concord (22.9%) has the largest share of this group followed by Walnut Creek (17.9%) and San Ramon (12.2%). The first graph shows the combined numbers for these three groups.

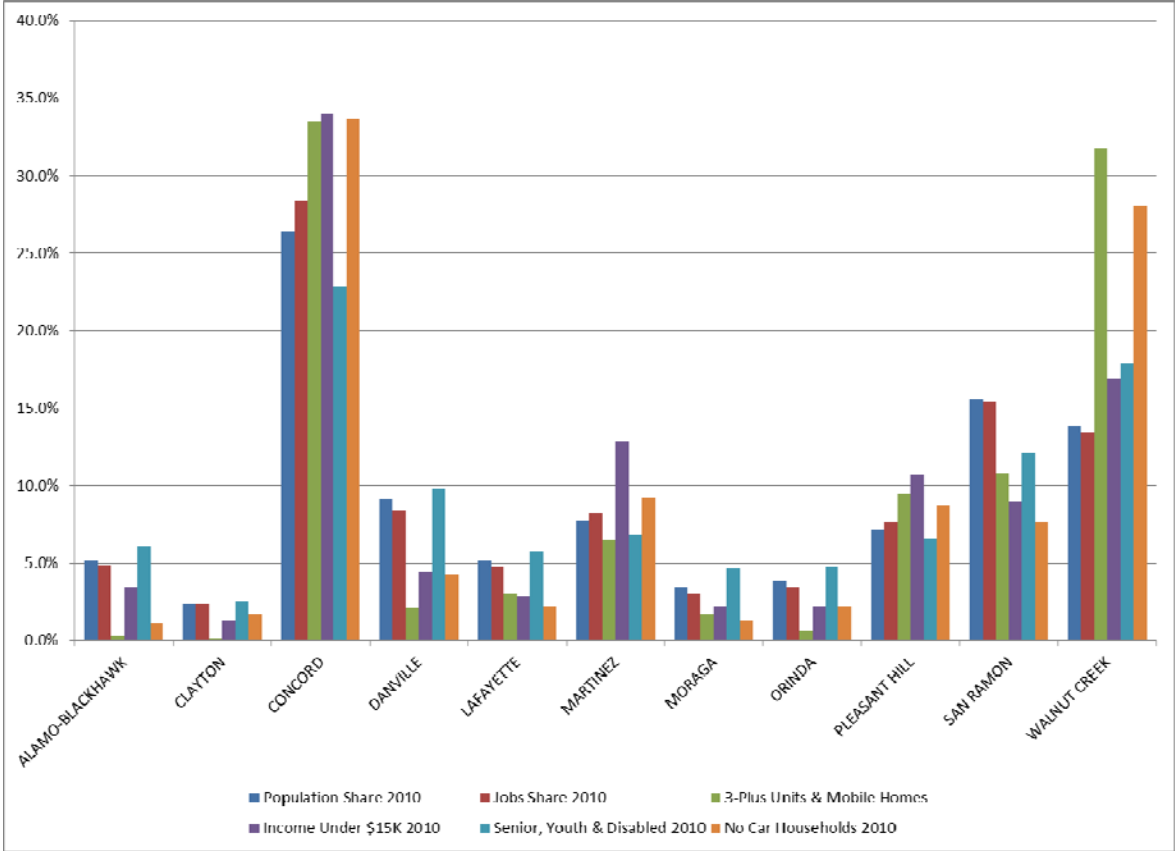


The second graph shows each group separately along with the general population share of each area. In the second graph note the impact of the large senior population of Walnut Creek and the large disabled and youth populations of Concord.



**Un-weighted Combined Score:** A combined score was developed by giving each of the equity factors equal weight. Compared to a method just using population Alamo/Blackhawk, Clayton, Danville, Lafayette, Moraga, Orinda, and San Ramon had their score reduced by the demographic, employment, and density factors. Concord, Pleasant Hill, Martinez, and Walnut Creek had their score increased by the demographic, employment, and density factors.



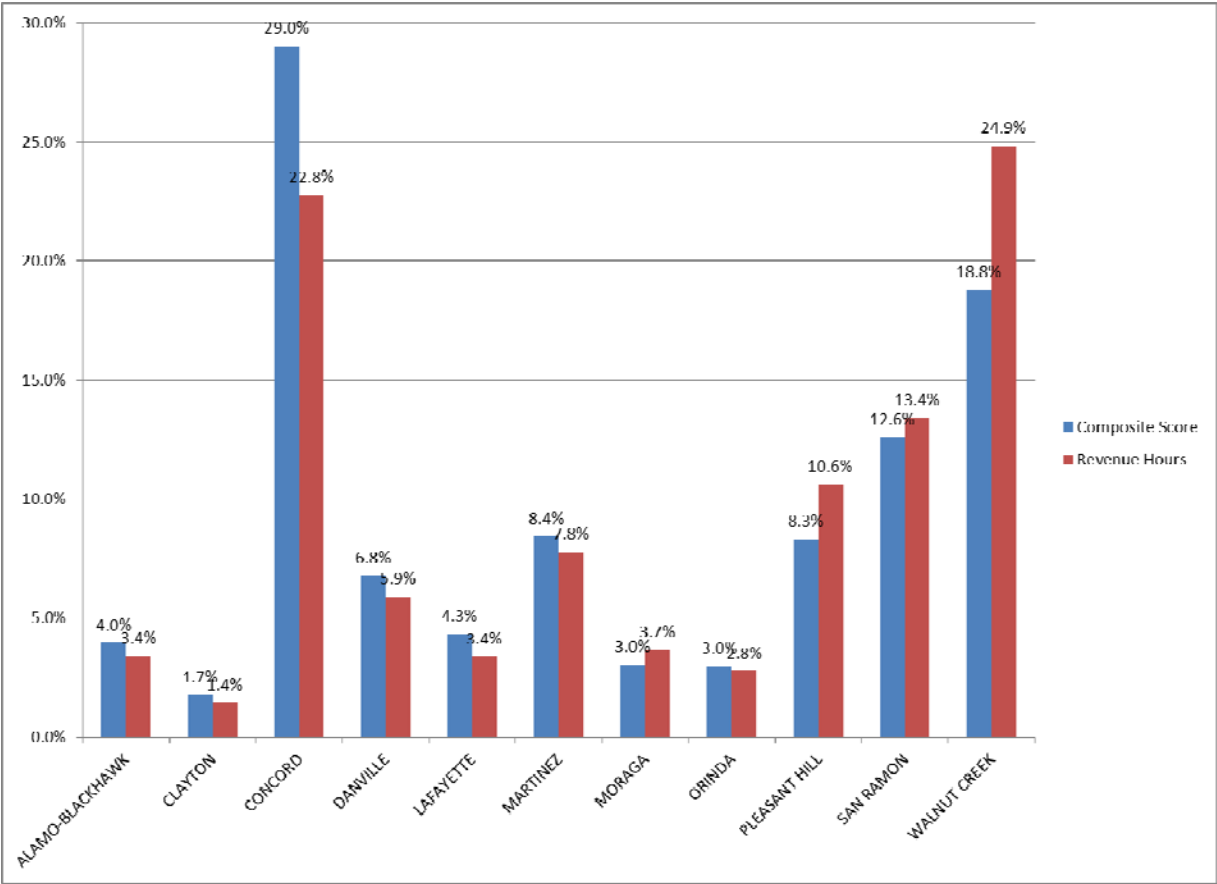


**Evaluation of Equity Results:**

The revenue hours of service for each jurisdiction were compared to the equity factor score. The revenue hours of service allocation was updated to separate out the Alamo/Blackhawk area and exclude service in unincorporated areas of the county. The allocation is based on percentage of local street miles each route is in each community. This percentage of local street miles is applied to the annual revenue service hours for each route. The result is an indicator of the revenue service hours operated in each community.

This analysis includes Route 4, the downtown Walnut Creek shuttle bus, even though it is heavily subsidized by the City of Walnut Creek. Other subsidized services including service to Bishop Ranch are allocated to the communities they serve.

The equity evaluation results are shown in the table below. Almost all of the communities are now served within 2% of their equity scores. All of the gaps between service levels and equity scores can be attributed to the location of major traffic generators (Broadway Plaza, Sun Valley Mall, Diablo Valley College) and transit centers at major BART stations (Concord, Pleasant Hill, and Walnut Creek).



**Recommendations/ Next Steps:**

Overall this evaluation shows that current County Connection service is allocated in an equitable manner. Past policies of maintaining service coverage while adjusting service levels based on productivity has resulted in a generally equitable distribution of service.

County Connection should continue to use the equity standards developed in this report to monitor service equity. This procedure combined with the County Connection Short Range Transit Plan updates, Federal Title VI reporting, and fixed route performance standards should continue to insure equitable service levels for the communities that comprise County Connection.

The goal of service equity must be kept in perspective. County Connection usage and demand is not a function of city limits or jurisdictional boundaries. There is a need for connectivity within the County Connection service area that is more important to our passengers and the public than an equity balance. As such, CCCTA's planning staff values this equity analysis but views it as one factor in system design.

**RESOLUTION NO. 2012-019**

**CENTRAL CONTRA COSTA TRANSIT AUTHORITY  
BOARD OF DIRECTORS**

\* \* \*

**AUTHORIZING ADOPTION OF AN UPDATED TITLE VI REPORT  
FOR SUBMISSION TO THE FEDERAL TRANSIT ADMINISTRATION**

WHEREAS, the County of Contra Costa and the Cities of Clayton, Concord, the Town of Danville, Lafayette, Martinez, the Town of Moraga, Orinda, Pleasant Hill, San Ramon and Walnut Creek (hereinafter "Member Jurisdictions") have formed the Central Contra Costa Transit Authority ("CCCTA"), a joint exercise of powers agency created under California Government Code Section 6500 *et seq.*, for the joint exercise of certain powers to provide coordinated and integrated public transportation services within the area of its Member Jurisdictions; and

WHEREAS, CCCTA receives annual federal financial assistance, including funds from the U.S. Department of Transportation and its Federal Transit Administration (FTA); and

WHEREAS, every three years, FTA grantees must submit a report on their compliance with Title VI of the Civil Rights Act of 1964, specifically addressing equal access to agency benefits and services to all persons without regard to race, color or national origin;

WHEREAS, CCCTA's next Title VI report must be submitted to the FTA in March 2012 to assure continued eligibility for federal financial assistance; and

WHEREAS, the Marketing, Planning and Legislative Committee has reviewed the updated Title VI Report as developed by staff, and recommends its adoption for submission to the FTA..

NOW, THEREFORE, BE IT RESOLVED that the Board of Directors hereby adopts the updated Title VI Report; and

BE IT FURTHER RESOLVED that the Board of Directors authorizes the General Manager, or his designee, to submit the updated Title VI Report to the Federal Transit Administration, and further authorizes the General Manager to make minor revisions in consultation with Legal Counsel as may be necessary to comply with Title VI regulations and FTA guidance, to assure continued eligibility for the receipt of federal financial assistance.

Regularly passed and adopted this 16<sup>th</sup> day of February 2012 by the following vote.

AYES:

NOES:

ABSTAIN:

ABSENT:

---

Amy R. Worth, Chair, Board of Directors

ATTEST:

---

Janet Madrigal, Clerk to the Board