

To: Board of Directors

Date: May 29, 2015

From: Laramie Bowron, Manager of Planning

Reviewed by:

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**Subject: Title VI Equity Analysis – Martinez Shuttle**

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This analysis of the implementation of the Martinez Shuttle, which included an evaluation against FTA standards and County Connection's Title VI policies, shows that minority and low-income populations are not disproportionately burdened by this change.

As a federal grant recipient, County Connection is required to maintain and provide to the Federal Transit Administration (FTA) information on its compliance with Title VI regulations. This included adopting the Major Service Change, Disproportionate Burden, and Disparate Impact policies in June 2013. These policies dictate when an Equity Analysis is required and at what threshold service or fare changes could have potentially discriminatory effects on low-income or minority populations. FTA requires the Board to adopt a Title VI Equity Analysis when a Major Service Change is implemented.

**Martinez Shuttle:**

The Martinez Shuttle had been contingent on savings from eliminating other service in Martinez, however, additional funds have been secured that allow for its implementation without any service cuts.

The census tracts that the Martinez Shuttle would serve are currently served by Routes #16, #18, #19, #28, and #98X. The tables below compare the current level of service to these census tracts with the additional service provided by the Shuttle.

The data shows that the proposed route will increase service going to low-income census tracts by a greater percentage than that to non-low-income census tracts. The proposed route will also increase service to non-minority census tracts more than service to minority census tracts, however, the difference is only 3.42% in revenue miles and 6.8% in revenue hours. This difference remains below the 20% threshold set in the Disparate Impact Policy.

	Current	Proposed	% Difference
Low-Income Rt. Miles	8.79	11.35	29.20%
Non-Low-Income Rt. Miles	19.95	24.63	23.44%
Total Rt. Miles	28.74	35.98	25.20%
Low-Income Rt. Hours	13:06	18:14	39.18%
Non-Low-Income Rt. Hours	29:20	38:42	31.92%
Total Rt. Hours	42:27	56:57	34.16%

### Minority Analyses

	Current	Proposed	% Difference
Minority Rt. Miles	5.61	6.86	22.45%
Non-Minority Rt. Miles	23.13	29.11	25.87%
Total Rt. Miles	28.74	35.98	25.20%
Minority Rt. Hours	08:45	11:17	28.75%
Non-Minority Rt. Hours	33:41	45:40	35.56%
Total Rt. Hours	42:27	56:57	34.16%

This data demonstrates that the implementation of the Martinez Shuttle will not have a disproportionately adverse effect on residents of minority or low-income census tracts.

**Recommendation:**

The committee recommends the Board adopt the attached Title VI Equity Analysis and accompanying resolution.

# County Connection Title VI Equity Analysis – Martinez Downtown Shuttle

## Introduction

As a federal grant recipient, the Central Contra Costa Transit Authority (County Connection) is required to maintain and provide to the Federal Transit Administration (FTA) information on its compliance with Title VI regulations.

This Title VI assessment covers County Connection's proposed Martinez Shuttle.

This route was developed as part of County Connection's Adaptive Service Analysis Plan, adopted at the December 2013 Board of Directors meeting.

The Martinez Shuttle was contingent on savings from eliminating the Route #19, which was not supported by the public. Since then, additional funds have been secured that allow for the implementation of Martinez Shuttle without any service cuts.

Through a Title VI analysis it has been determined that its implementation would not have a disproportionately adverse effect on minority or low-income populations.

The following report provides a summary of the route, Title VI analysis, and results.

## Proposal

At the December 2013 Board of Directors meeting, the Board approved the Adaptive Service Analysis Plan. The study focused on alternatives for transit service in areas where the current service was not productive. The consultant team first selected neighborhoods for study and narrowed down the choices to the Trotter/South Walnut Creek area, Downtown Martinez, and Shadelands. Service options were developed and specific recommendations were made to improve service effectiveness in these neighborhoods.

The proposed changes from the Adaptive Service Analysis Plan are listed below:

### Walnut Creek

- Modify Route #7 to provide more frequent and direct service between Pleasant Hill BART and Shadelands.
- Eliminate the Route #2 and modify the Route #5 to provide more frequent and direct service from Creekside to Walnut Creek BART.

### Martinez

- Modify Routes #18 and #28 by eliminating service on Howe Rd. to increase service to the retail centers on Arnold Dr.
- Eliminate the Route #19 and redirect the service hours to a new community shuttle route.

- Operate a community shuttle between downtown Martinez and retail on Arnold Dr.

**Public Outreach:**

Beginning in February 2014 staff conducted outreach to receive public comments on these service recommendations. Nearly 200 comments were received.

The public was able to comment on the proposed changes in the following ways:

- Attending public meetings (one in Martinez City Hall and one in the Walnut Creek Library),
- Emailing [planning@countyconnection.com](mailto:planning@countyconnection.com),
- Calling County Connection Customer Service,
- Commenting on County Connection’s website, or
- Completing a text survey via Textizen (see attached summary).
- Writing to the Director of Planning

Notices for the public meetings were placed on the buses as well as in the Contra Costa Times and information on the other outreach efforts was placed on buses as well as on County Connection’s website.

Because some individuals submitted comments through more than one avenue, the numbers for total comments and individuals may not match exactly.

The chart below shows the public participation by type:

<b>Venue</b>	<b># of Comments/Participants</b>
Public Meetings	Martinez - 14
	Walnut Creek - 15
Email	30
Customer Service	14
Textizen	English - 71
	Spanish - 8
Website	29

**Route #2 and Route #19**

Not surprisingly, most respondents commented on the two routes that were proposed to be eliminated (Routes #2 and #19).

Through the website, customer service, and email, 24 comments were received requesting that service continue on the Route #19. The comments showed that passengers in Martinez depend on the Route #19 to access public health and social services. Many commented at the public meeting that they wanted more frequency on the route.

The Route #2 recommendation generated 19 comments through the website, email, and customer service with only 3 supporting its elimination; though 10 suggested retaining at least some level of commute service. Most of the respondents (from all public input) use the Route #2 to commute to work or school and Route #19 for work and medical trips.

### Route #5

Overall only two people commented on the Route #5 change via the website and both supported the recommendation. Further, 23 respondents who filled out the texting survey supported the change while 14 did not.

### Route #7

The change to the Route #7 generated 6 comments in favor and 7 in opposition. Comments in support of the recommendation were from those that work in Shadelands and the Children's Hospital. Comments received via text were also evenly split in their support.

### Route #28 and Martinez Shuttle

Though only a minor service change was recommended, the Route #28 generated significant public interest and comments were skewed towards keeping the current routing. The Martinez shuttle was strongly supported but not at the expense of the Route #19.

### **Prior Implemented Service Changes:**

The following service changes were implemented Fall 2014:

- No changes in Martinez
- Route #2: Retain two morning and two evening commute trips. Re-route via Broadway
- Route #5: Streamline service to BART
- Route #7: Streamline service between Shadelands and Pleasant Hill BART

### **Recommendation:**

Staff recommends implementing the Martinez Shuttle route that was included in the Adaptive Service Analysis Plan.

Public comments reflected a significant need for the Route #19 in Martinez and since the Martinez Shuttle was contingent on savings from eliminating the Route #19, it was not implemented with the Walnut Creek service changes.

## **Title VI Policies**

In June 2013 County Connection's Board of Directors adopted the following policies:

### ***Major Service Change Policy***

County Connection defines a major service change as:

1. An increase or decrease of 25 percent or more to the number of transit route miles of a bus route; or
2. An increase or decrease of 25 percent or more to the number of daily transit revenue miles of a bus route for the day of the week for which the change is made; or.
3. A change of service that affects 25 percent or more of daily passenger trips of a bus route for the day of the week for which the change is made.

Changes shall be counted cumulatively, with service changes being "major" if the 25 percent change occurs at one time or in stages, with changes totaling 25 percent over a 12-month period.

The following service changes are exempted from this policy:

1. Changes to service on a route with fewer than 10 total trips in a typical service day are not considered "major" unless service on that route is eliminated completely on any such day.
2. The introduction or discontinuation of short- or limited-term service (e.g., promotional, demonstration, seasonal or emergency service, or service provided as mitigation or diversions for construction or other similar activities), as long as the service will be/has been operated for no more than twelve months.
3. County Connection-operated transit service that is replaced by a different mode or operator providing a service with similar or better headways, fare, transfer options, span of service, and stops.

### ***Disparate Impact Policy***

County Connection policies establish that a fare change or major service change has a disparate impact if minority populations will experience 20% more of the cumulative burden, or experience 20% less of the cumulative benefit, relative to non-minority populations, unless (a) there is substantial legitimate justification for the change, and (b) no other alternatives exist that would serve the same legitimate objectives but with less disproportionate effects on the basis of race, color or national origin.

### ***Disproportionate Burden Policy***

County Connection policies establish that a fare change or major service change has a disproportionate burden if low-income populations will experience 20% more of the cumulative burden, or experience 20% less of the cumulative benefit, relative to non-low-income populations unless the disproportionate effects are mitigated.

### **Public Outreach:**

In developing these policies, County Connection staff conducted public outreach (detailed below), including three public meetings with language services available, to provide information and get feedback on the draft policies. Staff incorporated public input gathered through this outreach into the policies proposed for Board approval.

#### Meetings:

March 28, 2013 – Monument Corridor Transportation Action Team

*Comments: Include an annual review to ensure that major service change threshold has not been crossed*

April 15, 2013 – Public Meeting at the San Ramon Community Center

*Comments: Consistent with prior comment to include an annual review for major service changes*

May 14, 2013 - Public Meeting at the Walnut Creek Library

*Comments: None*

April 1<sup>st</sup> – June 1<sup>st</sup>, 2013 – Policies available for comments on County Connection Website

June 20, 2013 – Public Hearing and Proposed Adoption at the County Connection Board of Directors Meeting

*Comments: None*

See attached copy of Board resolution demonstrating the County Connection's board consideration, awareness, and approval of the Title VI policies.

### **Title VI Equity Analysis**

The proposed route constitutes a major service change which necessitates a Title VI Equity Analysis.

### **Adverse Effects**

Staff has defined and analyzed adverse effects related to this major service change as increased route miles and route hours, and have considered the degree of the adverse effects when planning the service change.

### **Analysis Framework**

Staff used Census 2010 census-tract data for this analysis. This data was used to compare the change in revenue miles and hours in minority tracts to non-minority tracts and low-income tracts to non-low-income tracts resulting from the implementation of the Martinez Shuttle. This data was selected because it was the most comprehensive data available for the areas affected by the service change.

The proposed Martinez Shuttle along with Routes #16, #18, #19, #28, and #98X, which currently serve the same tracts, were intersected using ArcGIS with census data to show the percentage that overlaid each census tract. This was then exported and coupled with Line Summary data to show the revenue mile and revenue hour percentage in each census tract.

**Assessing Impacts**

Based on Census 2010 data, 37.1% of the population residing in County Connection’s service area identifies as minority. This designates any census tract with a greater than 37.1% minority population a “minority tract.”

Because 5.7% of the population residing in County Connection’s service area is determined to be below the poverty level, any tract with greater than 5.7% below the poverty level is designated a “low-income tract.”

The tables below show the results of the census tract, ArcGIS, and Line Summary analysis. The tables compare the proposed route implementation in revenue miles and revenue hours operated in low-income to non-low-income and minority to non-minority tracts.

The data shows that the proposed route will increase service going to low-income census tracts by a greater percentage than that to non-low-income census tracts. The proposed route will also increase service to non-minority census tracts more than service to minority census tracts, however, the difference is only 3.42% in revenue miles and 6.8% in revenue hours. This difference remains below the 20% threshold set in the Disparate Impact Policy.

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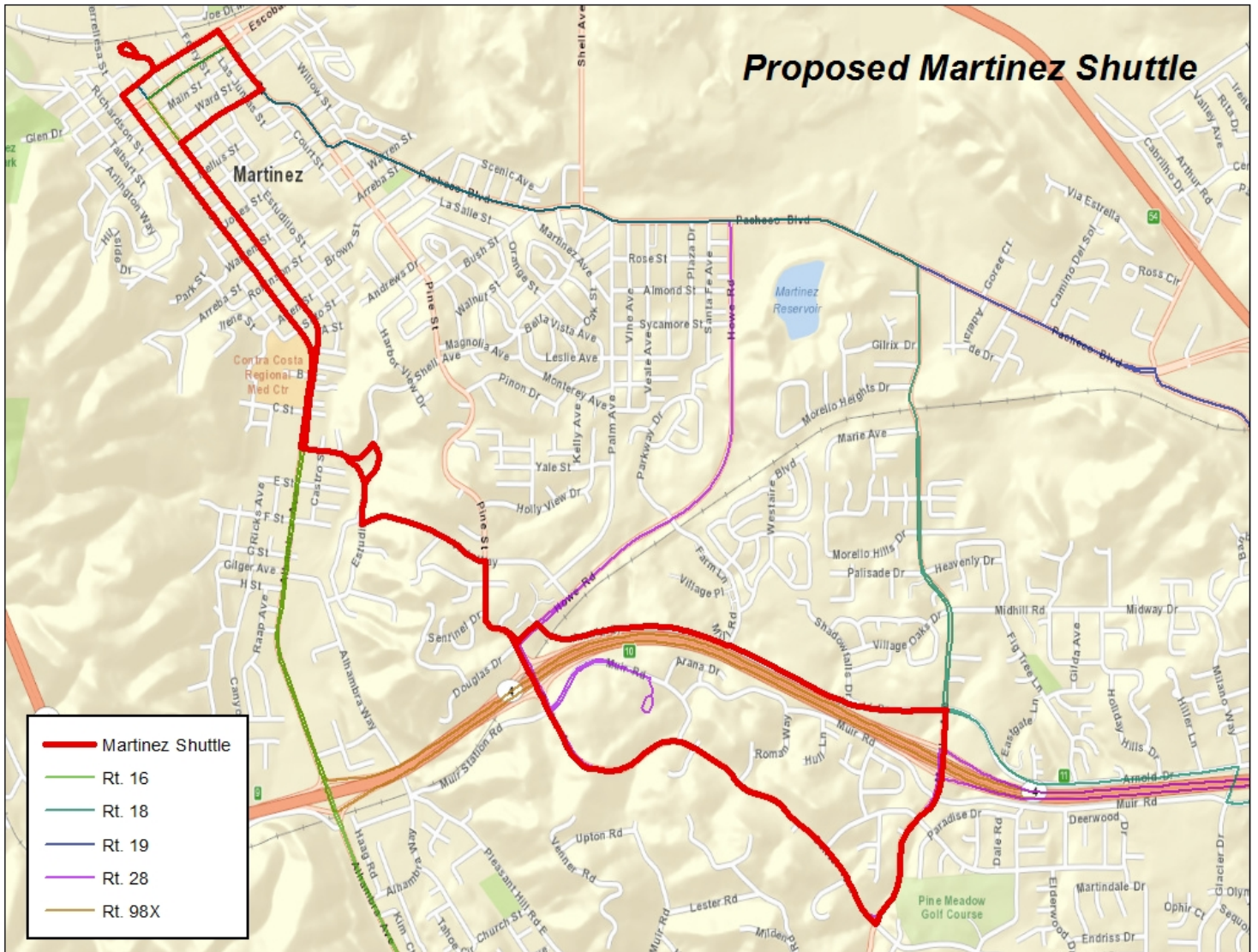


The table below further breaks the data down by routes serving the same census tracts as the proposed Martinez Shuttle. This shows the percentage of revenue hours in low-income tracts and minority tracts.

Route	% of Service to:			
	Low-Income Census Tracts	Non-Low-Income Census Tracts	Minority Census Tracts	Non-Minority Census Tracts
Rt. 16	6.62%	18.01%	6.62%	18.01%
Rt. 18	7.68%	9.62%	5.02%	12.28%
Rt. 19	10.77%	3.20%	7.04%	6.93%
Rt. 28	13.92%	25.12%	4.67%	34.37%
Rt. 98X	5.64%	33.26%	5.02%	33.87%
<i>Martinez Shuttle</i>	35.42%	64.58%	17.38%	82.62%

This data demonstrates that the implementation of the Martinez Shuttle will not have a disproportionately adverse effect on residents of minority or low-income census tracts.

Attachment A: Proposed Shuttle Map

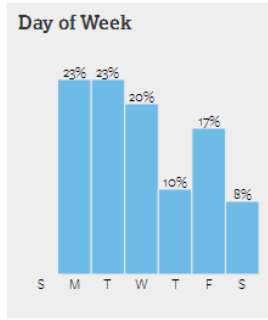
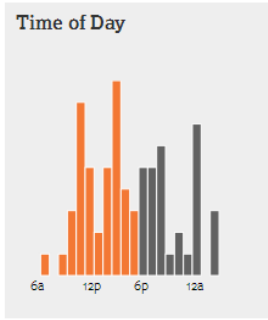


# Attachment B: Summary of Textizen Survey Responses

County Connection > Service Change - English

**71**  
responses

latest about 3 days ago



Assigned phone  
**1(925) 301-9650**

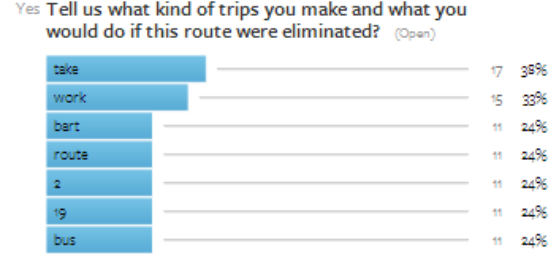
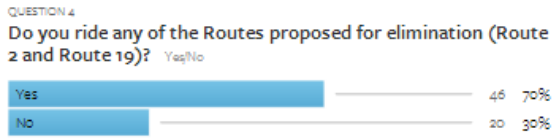
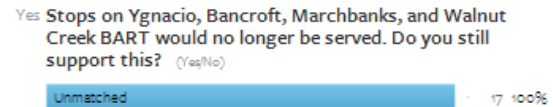
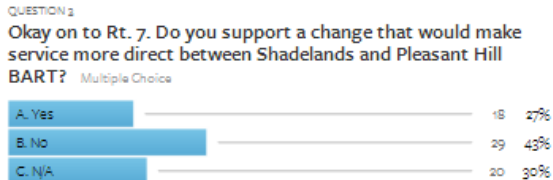
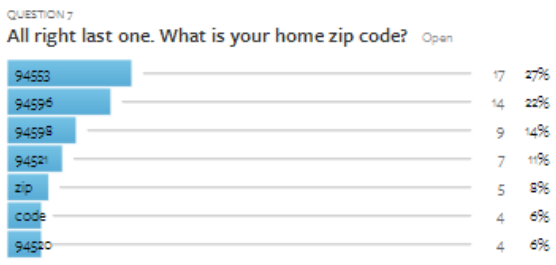
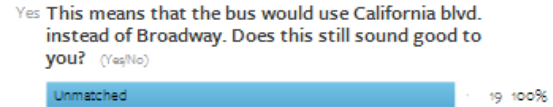
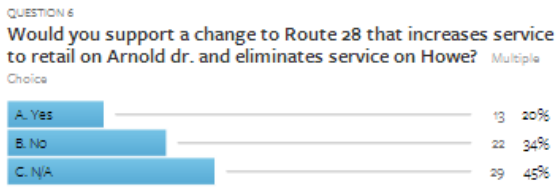
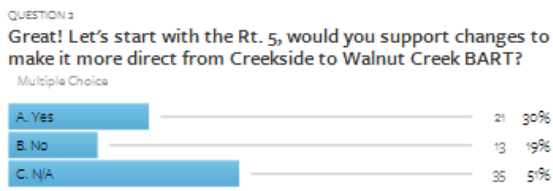
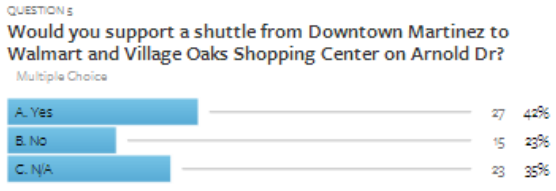
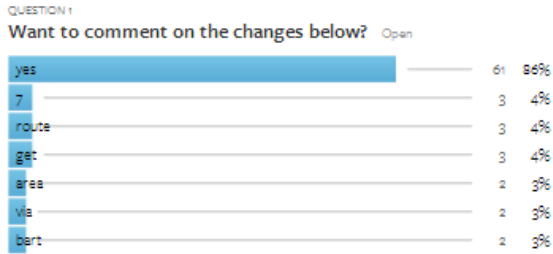
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Status  
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Results public?  
**No**

[EDIT](#) [DANGEROUS](#)



**RESOLUTION NO. 2015-032**

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

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**APPROVING THE TITLE VI EQUITY ANALYSIS FOR THE PROPOSED MARTINEZ SHUTTLE**

**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**, the CCCTA Board of Directors (Board) adopted the Adaptive Service Analysis Plan, which evaluated service in Walnut Creek and Martinez, and recommended changes to route in those areas to improve productivity; and

**WHEREAS**, subsequent to adoption of the Adaptive Service Plan, staff conducted extensive public outreach including two public hearings in accordance with Board policy and evaluated all comments received; and

**WHEREAS**, the Adaptive Service Plan included a proposed new Martinez Shuttle to improve system capacity and efficiency, but CCCTA had no funding at that time to implement such a proposal without requiring other cuts of nearby routes; and

**WHEREAS**, CCCTA has identified funding for the Martinez Shuttle such that it now can be introduced without requiring funding from service cuts; and

**WHEREAS**, the Board, at its August 20, 2013 meeting, approved Resolution 2013-019, adopting Major Service Change, Disparate Impact, and Disproportionate Burden policies as required for compliance with Title VI of the Civil Rights Act of 1964 and implementing regulations; and

**WHEREAS**, introduction of the Martinez Shuttle would meet CCCTA's Major Service Change definition, requiring completion of a Title VI Equity Analysis to assess the distribution of benefits from the proposed service on minority and low-income populations; and

**WHEREAS**, staff has completed the Title VI Equity Analysis of the proposed Martinez Shuttle, attached hereto, and found that the proposed service expansion will present neither a disparate impact on minority communities nor a disproportionate burden on low-income populations; and

**WHEREAS**, the Marketing, Planning & Legislative Committee recommends the Board approve the Title VI Analysis for the Martinez Shuttle; and

**WHEREAS**, the Board has carefully considered the public input received, the potential benefits presented by introduction of the Martinez Shuttle, and the associated Title VI analysis.

**NOW, THEREFORE, BE IT RESOLVED** that the Board of Directors of the Central Contra Costa Transit Authority hereby approves and adopts the Title VI Equity Analysis of the Martinez Shuttle, attached hereto; and

**BE IT FURTHER RESOLVED** that the General Manager, or his designee, is hereby authorized to implement the proposed Martinez Shuttle for implementation in Fall 2015.

Regularly passed and adopted this 21st day of June 2015, by the following vote.

AYES:

NOES:

ABSTENTIONS:

ABSENT:

ATTEST:

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A.G. Dessayer, Chair, Board of Directors

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Lathina Hill, Clerk to the Board