

To: Board of Directors

Date: 05/10/2018

From: Sean Hedgpeth, Manager of Planning

Reviewed by: R.H.

Subject: Title VI Equity Analysis – Route 3 and Route 99X

Background:

During the January 2018 Board of Directors meeting, staff asked for authorization to begin the public process to possibly discontinue Route 3. The justification for this was that Route 3 is funded by California's Cap and Trade LCTOP (Low Carbon Transit Operations Program), which provides operating funds to transit agencies if they serve disadvantaged communities (DAC). While prior guidelines allowed these routes to serve within ½ mile of a DAC, new guidelines require the route to go directly through the DAC. Route 3 is not compliant with the new guidelines and ridership has remained low. Route 99X was proposed at the March 2018 Board of Directors meeting, and it was seen as a replacement for Route 3. Route 99X directly serves the DAC, roughly the Pacheco and Morello area. As part of eliminating Route 3 and implementing Route 99X, we must conduct a Title VI Equity analysis.

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. The analysis included for this item has been submitted for legal review.

Analysis:

This analysis of the elimination of Route 3 (Martinez Shuttle) and implementation of Route 99X (Amtrak to BART) 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.

For purposes of analysis, Route 3 was considered the 'Current' service and Route 99X 'Proposed'. The Route 3 current mileage and service hours were compared to the proposed Route 99X, using identified minority and non-minority census blocks identified in the March 2018 CCCTA Title VI update. Based upon the results of this update, no low-income census blocks were within the Route 3/99X service area, so the hours and miles analysis focused on minority census blocks only.

Minority Analysis

	Current	Proposed	% Difference
Minority Rt. Miles	0.31	8.63	2,684%
Non-Minority Rt. Miles	6.97	30.06	331%
Total Rt. Miles	7.28	38.69	431%
Minority Rt. Hours	1.00	3.17	217%
Non-Minority Rt. Hours	13.50	8.46	-37%
Total Rt. Hours	14.50	11.63	-20%

The disparity of the difference of non-minority miles was 2,353% (2,684% minus 331%), and the hours disparity was 254% (217% minus -37%) in favor of more service and miles to minority census blocks.

This data demonstrates that the implementation of the Martinez Shuttle will not have a disproportionately adverse effect on residents of minority census blocks, as the disparity between the differences of Route 3 (current) and Route 99X (proposed) is well under CCCTA's established disproportionate impact threshold of 20%.

Public Outreach:

As part of our Title VI board adopted policy, public outreach must be conducted as part of an Equity Analysis. Staff has scheduled two meetings to inform the public and to gather feedback. One meeting is scheduled on May 14th from 4pm to 6pm at Martinez City Hall, and the second meeting is a scheduled public hearing preceding the Board of Directors meeting at County Connection offices in Concord on May 17th at 9am. The resulting comments from those public meetings will be included in an updated Title VI report, which will be presented to the Federal Transit Administration.

Recommendation:

The Marketing, Planning, and Legislative Committee and staff recommend the Board make a final approval of the elimination of Route 3 and the introduction of Route 99X and related Title VI Analysis.

Financial Implications:

LCTOP funds have been programmed to operate Route 99X.

Attachments:

Title VI Equity Analysis (Pending public outreach section. Final document will be available at the Board meeting.)

Minority Census Blocks

Map of Parallel Service

County Connection Title VI Equity Analysis – Elimination of Route 3 and Implementation of Route 99X in Martinez

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. County Connection's Title VI Program was updated at the March 2018 Board of Director's meeting.

This Title VI assessment covers the equity analysis of the elimination of County Connection's Route 3 and the implementation of the proposed Route 99X.

Route 3 was developed as part of County Connection's Adaptive Service Analysis Plan, adopted in December 2013. Route 3 was launched as part of a service proposal in Martinez and Walnut Creek in August 2015. Since then, the route has performed below County Connection's performance guidelines and the grant used to pay for the route has a new set of guidelines.

Route 99X, which is peak service from Martinez Amtrak to North Concord BART, is a new proposed route that complies with the new set of guidelines and was asked for by the community.

Proposal

County Connection is proposing to eliminate Route 3 and to implement a new route, Route 99X. This service change is proposed to be implemented in the Fall 2018 bid, on August 10, 2018.

Public Outreach:

Beginning in April 2018 staff conducted outreach to receive public comments on these service recommendations.

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 County Connection's board room,
- Emailing planning@countyconnection.com,
- Calling County Connection Customer Service,
- Commenting on County Connection's website, or

Notices for the public meetings were placed on the buses as well as in the East Bay Times and information about the changes was available 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.

Outreach and feedback placeholder (# of comments, attendees, summary of comments, etc,

Recommendation:

Staff recommends eliminating the Route 3 Martinez Shuttle and implementing Route 99X, express service from Martinez AMTRAK to North Concord BART.

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 1st – June 1st, 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

Title VI Equity Analysis

The proposed implementation of Route 99X and elimination of Route 3 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 2015 census-block data for this analysis. This data was used to compare the change in revenue miles and hours in minority blocks to non-minority blocks resulting from elimination of the Route 3 Martinez Shuttle and implementation of the proposed Route 99X. No low-income tracts are served by either Route 3 or the proposed Route 99X as of our latest 2018 Title VI update. This data was selected because it was the most comprehensive data available for the areas affected by the service change.

Assessing Impacts

Based on American Community Survey 2015 data, 41.6% of the population residing in County Connection’s service area identifies as minority. This designates any census block with a greater than 41.6% minority population a “minority block.”

Because 4.2% of the population residing in County Connection’s service area is determined to be below the poverty level, any block with greater than 4.2% below the poverty level is designated a “low-income block.”

The tables below show the results of the census block, ArcGIS, and Line Summary analysis. The tables compare the proposed route implementation of Route 99X compared to the current Route 3 service in revenue miles and revenue hours operated in minority to non-minority blocks.

The proposed route will also increase service to non-minority census blocks more than service to minority census blocks, however, the proposed Route 99X is longer with two service patterns. The increase in minority route miles is over 2,300% more than the increase in non-minority route miles. Implementing Route 99X would also increase minority route hours by 180% more than non-minority route hours.

	Current	Proposed	% Difference
Minority Rt. Miles	0.31	8.63	2684%
Non-Minority Rt. Miles	6.97	30.06	331%
Total Rt. Miles	7.28	38.69	431%
Minority Rt. Hours	1.00	3.17	217%
Non-Minority Rt. Hours	13.50	8.46	-37%
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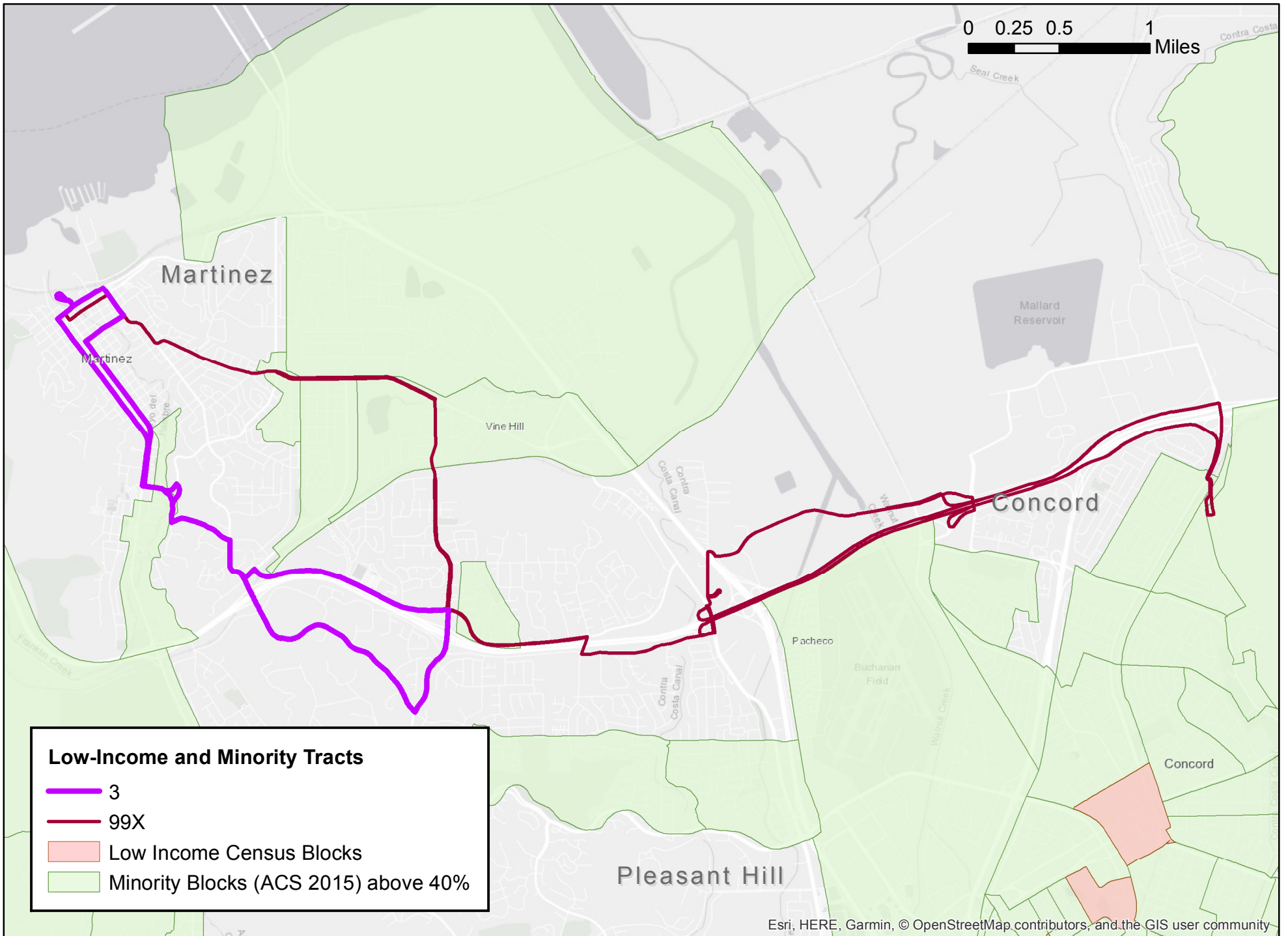
Parallel Transit Service to Route 3

As seen on the map on the proceeding page, most of Route 3’s coverage will be maintained through a combination of service from other existing County Connection routes including route 16, 18, 28 and 98X. The only segment without retained coverage is Arnold Dr between Howe Rd and Morello Ave, where Walmart resides. This segment has a length of 1.1 miles, with walking distances of a maximum of 0.55 miles from either Route 28 on Howe Rd/Arnold Dr, or Route 18 on Morello Ave/Arnold Dr.

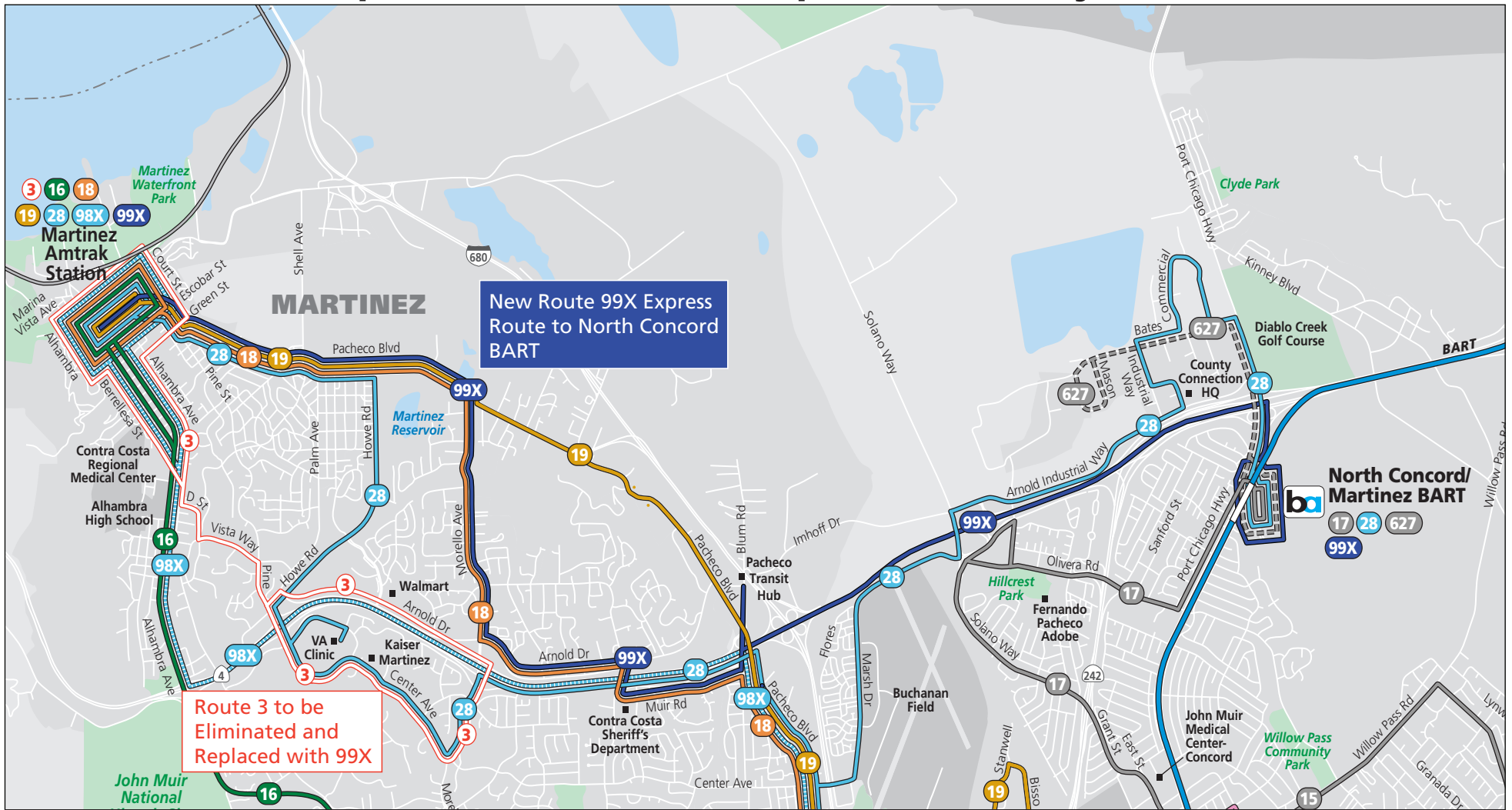
Conclusions

This data demonstrates that the implementation of the elimination of the Route 3 Martinez Shuttle and implementation of the proposed Route 99X will not have a disproportionately adverse effect on residents of minority blocks.

Route 3 and 99X and Minority Census Blocks



Route 3, Proposed Route 99X Map with Nearby Transit Routes



New Route 99X Express Route to North Concord BART

Route 3 to be Eliminated and Replaced with 99X

County Connection Routes with Parallel or Adjacent Service to Route 3

16 98X

Shares Route 3 portion on Alhambra/Berrellesa

18

Serves the Morello/Arnold area, walking distance to Walmart

28

Shares Howe Rd, Center Ave, and Morello Ave