

TITLE VI EVALUATION

In accordance with the May 13, 2007, Final Federal Title VI Circular (FTA C 4702.1A), this Title VI Evaluation has been completed for VTA's 2009 Annual Transit Service Plan, to be implemented starting on July 13, 2009. In order to comply with 49 CFR Section 21.5(b)(2), 49 CFR Section 21.5(b)(7) and Appendix C to 49 CFR part 21, recipients of financial assistance from the Federal Transit Administration (FTA) shall evaluate significant service changes and proposed improvements at the planning and programming stages to determine whether the changes have a discriminatory impact on minority and low income populations. For service changes, this evaluation requirement only applies to "major service changes." This approach must include:

- A description of the methodology used to determine the impact of the service change (Methodology).
- A determination as to whether the proposed change would have discriminatory impacts (Evaluation).
- A description of what, if any, action was taken by the agency in response to the analysis conducted (Implementation).

Methodology

VTA's methodology uses the guidance information provided in the circular to assess the effects of the proposed service changes on minority and low-income populations. Our approach is based on evaluating the impacts to routes that have minority or low income population greater than the service area average.

We have defined a route subject to Title VI analysis is defined as one that has 50% or more of its length in an area (census tract or traffic analysis zone) where the total minority population or low-income population is greater than the service area average. Overall, our Title VI methodology is based on criteria that guided the development of the Comprehensive Operations Analysis and now guides the Annual Transit Service Plan.

- VTA's approach is system wide and is meant to improve travel in the core areas where transit demand is greatest, augmented with specialized services (community bus, express) to fulfill certain travel niches. Concentrations of minority and low-income populations are well served by this approach based on our market analysis and onboard surveys, conducted as part of the Comprehensive Operations Analysis. Travel within the core market throughout the day (not just peak periods) was identified as being important to our passengers.
- The plan does not decrease or increase the overall service hours provided. Rather it focuses on deploying service to areas that demand or market analysis shows will result in the highest ridership. Service hours from unproductive services that are eliminated or reduced would be used to add new routes or improve existing well performing routes. Concentrations of minority and low-income populations, which are transit dependent, show high use of the more popular

transit services.

- VTA's service area population overall is a minority population. In the 2006 On-Board Survey, 63% of our passengers reported they had "no other way" to make their trip on transit, thus indicating they are transit dependent.

Our methodology also incorporates the chapters of this Plan titled "Public Outreach", "Service Evaluation" and "Ridership". These sections are included to provide an explanation of the outreach and service planning process. Involvement by passengers, potential passengers and community groups including those representing minority and low-income populations were an important part of the process.

Evaluation & Implementation

Of the 12 bus lines with recommended major changes, nine are subject to Title VI evaluation: Community Bus Lines 14 and 17 in Gilroy, 15 in Morgan Hill, and 45 in East San Jose; Core Lines 64, 66 and 68; and Express Lines 180 and 181 from Fremont. For detailed descriptions of the changes to each route consult the "Recommendations" chapter of this Plan.

Community Bus Lines 14 and 17 operate in Gilroy and currently run as one-way loops: Line 14 serves the Gilroy Transit Center and the Gilroy Crossings Shopping Center and Line 17 serves the Social Services Facility, Gilroy Outlets and St. Louise Hospital. The lines would be changed to serve as two-way routes with north/south service to the same facilities. The change results in an additional service (improved from 60 minute to 30 minute frequency) on both routes. This service addition is funded through a Lifeline grant. Lines 14 and 17 are shown in Figure 9-1 as routing changes.

Community Bus Line 15 in Morgan Hill serves Jackson Oaks and the Holiday Lake Estates, the Morgan Hill Caltrain Station, downtown and part of the Monterey Corridor (See inset map in Figure 9-1). Line 15 has continuously performed below the minimum performance standards: the average trip load is less than six passengers. For this reason the route would be discontinued. Marketing efforts and outreach to improve the service were conducted in July of 2007 and again after the implementation of the New Bus Service in 2008. The ridership has not improved. Community meetings have been held as a part of this Plan to discuss the termination of the route as well as other service changes in South County.

Prior to the COA Community Bus Line 45 was an extension of Line 64. Due to low ridership the new Line 45 was created as a community bus route. To date it is still performing poorly. Community meetings and emails revealed that people were generally displeased with the reduction in service. However, the proposed reductions will allow VTA to reallocate these under-utilized resources to lines in other minority and low income areas such as on Lines 66 and 68. VTA will research possible Lifeline funding in order to improve future service in this area. (See Service Change Routes in Figure 9-1.)

Saturday service on Line 64 will be reduced from a frequency of every 15 minutes to every 30 minutes between McKee and White. The ridership on the extra trips provided by 15 minute service is very low: the average peak load is 6 riders. This service recommendation was presented at several community meetings. (See Service Change Routes in Figure 9-1.)

Ridership on Lines 66 and 68 has been very high. Currently, not all the trips serve all stops and route frequency varies. Both lines will be made more convenient to use by increasing service to every 15 minutes over the whole route all day. Public feedback regarding this change has been overwhelmingly positive. (See Service Change Routes in Figure 9-1.)

See the Recommendations section of this Plan for a detailed description of the complication, proposed changes for Express Lines 180 and 181. New routing for Line 181 will improve travel times to downtown San Jose and new service throughout the day is also proposed. Based on public input the current routing for Line 180 using Mission Boulevard and I-680 will remain.

Overall, a net 5,445 annual service hours are being added to these Title VI routes as a result of these proposed changes. Since this plan is cost neutral, these service hours are being reallocated from non-Title VI routes. In general the proposed changes to Title VI routes are either service enhancements or reductions to service based on poor ridership performance. Our implementation strategies for these changes will include a high level of public outreach and marketing in advance of making the changes, planned for July 2009. The New Bus Service implementation in January 2008 has shown that a comprehensive public marketing effort, which also includes the use of trained ambassadors to provide field level information to passengers, has resulted in a successful launch. We will continue with this approach for the implementation of the proposals described here.

Table 9-1: Title VI Routes Change in Annual Hours

Route	Hours Removed	Hours Added
14	-	-
15	-3533	-
17	-	2995
45	-5049	-
64	-1435	-
66	-	17012
68	-	468
180	-2683	-
181	-2330	-
Total	-15,030	20,475

