



August 29, 2014

To: Executive Board

Subject: **Foothill Transit's 2014 Title VI Program Submission**

---

### **Recommendation**

Approve Foothill Transit's 2011-2014 Title VI Program update and analysis.

### **Analysis**

Since 1972, the Federal Transit Administration (FTA) has required recipients of federal assistance to provide assessments of compliance with Title VI of the Civil Rights Act of 1964 as part of the grant approval process. An updated plan must be submitted by grantees every three years; Foothill Transit will submit its next report by October 1, 2014. Title VI regulations mandate that no person in the United States shall, on the ground of race, color and national origin, be excluded from participation in, or be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance from the FTA.

In October 2012, updated Title VI guidelines were released by the FTA which clarified the reporting responsibilities of transit agencies, and added additional responsibilities. In accordance with FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," Foothill Transit's Title VI report covers all aspects of the agency's program and monitoring efforts, and contains the following elements:

1. Information about how Foothill Transit communicates the rights granted by Title VI to its customers, including information about how it collects and addresses Title VI related complaints.
2. Information regarding Foothill Transit's public outreach program and strategy including its plan to integrate Limited English Proficient people.
3. Foothill Transit's systemwide Standards and Policies including vehicle load, vehicle headway, on-time performance, service availability, distribution of transit amenities and vehicle assignment.
4. Demographic analysis of the population within Foothill Transit's service area.
5. Policies regarding major service changes and measuring service change impacts on minority and low-income neighborhoods, including a summary of service changes undertaken since Foothill Transit's last Title VI program review in 2011.
6. The results of the monitoring program to assess Foothill Transit's compliance with its own policies and procedures.

Foothill Transit is in the midst of key transitions which will affect aspects of its Title VI program. The agency began a Comprehensive Operational Analysis in January 2014 to



review all components of its planning and operating functions, including a line-by-line analysis of its system. In addition, rider surveys were conducted onboard Foothill Transit buses in spring 2014. At the time this report was compiled, only the preliminary results of the surveys were available to be incorporated into Foothill Transit's demographic analysis, however, once the survey results are finalized it will be vital to incorporate the findings into Foothill Transit's Four Factor Analysis and Language Access Plan. Keeping this information in mind, the key findings which indicate areas where Foothill Transit should direct its efforts during the next review period include the following:

- A. As indicated above, only preliminary rider survey results were available to be incorporated into Foothill Transit's Four Factor Analysis and Language Access Plan (LAP). Once the full survey results are available, staff will incorporate relevant data into the LAP and will review the plan to ensure it is sufficient to service Foothill Transit's Limited English Proficient riders.

The review of current Foothill Transit service against the Title VI policies and standards shows that service is mostly meeting the minimum standards. Summaries of each of the individual analysis points are listed below:

- B. Vehicle load – The only route to exceed the maximum load factor standard was 492 westbound during the peak period. Staff will seek to validate the farebox data by surveying runs during the peak period, and will assess the feasibility of adding trips during this period to ease crowding. Routes 178, 187 and 482 are also nearing the maximum load factor standard. Additional trips were already added to Route 187 in June 2014 to ease crowding; staff will continue to monitor ridership on this route.
- C. Vehicle headway – The majority of Foothill Transit service meets the minimum headway standards; however, Foothill Transit will review the feasibility of adding service for those lines which don't meet the minimum standard. Routes 274, 289, 292, 851, 853, 854 and 855 are community specific lines and currently do not have the ridership to support additional service.
- D. On-time performance – Fifteen routes did not exceed the system-wide average during both the weekday and weekend. Where possible, further adjustments will be made to the schedules that do not meet the overall system average. Staff will continue to work closely with the operations contractors to improve performance.
- E. Service availability – Service availability is distributed evenly with respect to the service area demographics. The minority population within ¼ mile distance of a Foothill Transit bus stop is slightly higher than the service area average.
- F. Vehicle assignment – The average age of buses is slightly older for the Pomona yard; however, this yard received nearly double the number of new buses than the Arcadia yard and will be the next to receive 60 more buses slated to arrive in October and December 2014.



- G. Distribution of transit amenities – Analysis of the distribution of funds from the Bus Stop Enhancement program showed that the population within a ¼ mile distance of two of the ten stops that benefited from funds did not exceed the minority population of the service area. However, these stops service Cal Poly Pomona and are thus heavily trafficked by regional traffic, not just the neighborhood within ¼ mile around the stop.

Another key aspect is completing the Major Service Change Analysis for pilot Route 495. The pilot route began in February 2013. The Foothill Transit Executive and Governing boards will have the opportunity to review the analysis and approve the creation of the line on a permanent basis if they see fit in fall 2014.

- H. Complete the Major Service Change – Equity Analysis for pilot Route 495.

The full Title VI Program is available by request at the Foothill Transit offices.

**Budget Impact**

There is no financial impact associated with adopting Foothill Transit's 2011-2014 Title VI Program.

Sincerely,

Britt Card  
Transit Planner

Doran J. Barnes  
Executive Director