

PALM BEACH COUNTY
BOARD OF COUNTY COMMISSIONERS

Agenda Item #: **5E-1**

AGENDA ITEM SUMMARY

Meeting Date: June 18, 2019

[XX] Consent [] Regular
[] Ordinance [] Public Hearing

Department: Palm Tran

I. EXECUTIVE BRIEF

Motion and Title: Staff recommends motion to Adopt: a Resolution of the Board of County Commissioners (BCC) of Palm Beach County, Florida, approving the Title VI Fare equity analysis required by the Federal Transit Administration showing that the fares for the pilot Flex Route and Dial-A-Ride service in the Glades Region, Go Glades, has no disparate impact to either minority or low-income populations with an effective date of June 18, 2019.

Summary: On August 14, 2018, as a part of the Route Performance Maximization (RPM) Project the Board of County Commissioners (BCC) authorized staff to implement a pilot Flex Route and Dial-A-Ride service for the Glades region. On December 18, 2018, the BCC approved a contract with MV Transportation and the "Go Glades" pilot service commenced on December 21, 2018. At the December 18, 2018 meeting, Palm Tran advised the BCC that it would present a fare equity analysis to the Board six months after service commenced. In accordance with Federal Transit Administration guidelines, all grant recipients are required to adopt a Title VI program. Palm Tran's Title VI program update, which was approved by the BCC on September 24, 2013, requires an equity analysis to be conducted in conjunction with all major service changes. Palm Tran contracted with Tindale Oliver to conduct the analysis and the results show that there is no disparate impact to low-income or minority populations. Countywide (DR).

Background and Justification: Palm Tran has not undergone any major service changes to its network of routes in over 20 years. Other transit systems across the country (e.g. Houston, Jacksonville and Columbus) have performed similar initiatives and have achieved increases in ridership and customer satisfaction. The proposed enhanced bus network is the result of many months of technical analysis and design and a robust community outreach program. As part of the RPM, the pilot Flex-Route and Dial-A-Ride service was proposed to replace the Belle Glade Express after the Florida Department of Transportation discontinued funding for that service. A mid-year review of the service is scheduled for the July 23, 2019 BCC workshop.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or national origin. In 2013, Palm Tran updated its Title VI program to require an equity analysis when undergoing a major service change to ensure that the proposed changes do not have a disparate impact on low-income or minority populations. This analysis must be presented to and approved by the grant recipient's governing body.

Attachment(s):

1. Title VI Fare Equity Analysis
2. Resolution (2)

Recommended By:  Executive Director Date 6/6/19

Approved By:  Assistant County Administrator Date 6/17/19

II. FISCAL IMPACT ANALYSIS

A. Five Year Summary of Fiscal Impact:

| Fiscal Years | 2019 | 2020 | 2021 | 2022 | 2023 |
|------------------------|------|------|------|------|------|
| | | | | | |
| | | | | | |
| Capital Expenditures | | | | | |
| Operating Costs | | | | | |
| External Revenues | | | | | |
| Program Income(County) | | | | | |
| In-Kind Match(County | | | | | |
| NET FISCAL IMPACT | 0 | | | | |
| #ADDITIONAL FTE | | | | | |
| POSITIONS (CUMULATIVE | | | | | |

| Is Item Included in Current Budget? | <u>Yes</u> | No |
|--|------------|-----------|
| Does this item include the use of federal funds? | Yes | No |

| Budget Account No: | | | |
|--------------------|------------|------|--------|
| Fund | Department | Unit | Object |

B. Recommended Sources of Funds/Summary of Fiscal Impact:

C. Departmental Fiscal Review: Carol Richmond 5/31/19
Carol Richmond, Interim Director Administrative Services

III. REVIEW COMMENTS:

A. OFMB Fiscal and/or Contract Dev. and Control Comments:

Sh. R. Chakra
OFMB ^{ED} 6/10 7/47

Contract Dev. & Control

B. Legal Sufficiency


Assistant County Attorney 6/17/19

Palm Tran's Title VI Program requires a fair equity analysis to be performed for any future changes.

C. Other Department Review

Department Director

(THIS SUMMARY IS NOT TO BE USED AS A BASIS FOR PAYMENT.)



planning | design | engineering

GREAT INSIGHTS. GREATER OUTCOMES.

5/31/2019 (revised 6/11/2019)

To: Chad Hockman, Senior Manager of Paratransit

From: Randall Farwell, Senior Associate *R Farwell*

Re: Go Glades Pilot - Fare Analysis

Overview of Pilot and Fares: Palm Tran introduced the Go Glades Flex Service Pilot (the Pilot) on December 21, 2018 with Palm Beach County Board of County Commissioners (BCC) approval. The Pilot was approved for a 12 month period to assess a new service delivery strategy in the Glades to better serve general public and ADA mobility needs in conjunction with existing fixed route service.

The Pilot included introduction of new fares. The Federal Transit Administration (FTA) requirements for fare changes (new fares, and changes to fares) requires that a temporary fare be subject to a Title VI Fare Equity Analysis if the fare is to be in place for more than a six month period. As the Pilot extends beyond six months, a Title VI Fare Equity Analysis was conducted on the temporary Pilot fares. In addition, Palm Tran committed to brief the BCC after six months of the Pilot to provide a report on the service and to present the findings of a Title VI Fare Equity Analysis for the temporary fare so that the fare may extend in through the end of the Pilot.

The fares implemented for the Pilot included a new Go Glades: base fare; off-route fee; and an extension of the “free” fare on fixed route to Go Glades service for persons showing a valid Americans with Disabilities Act (ADA) ID card. Table 1 presents relevant pre-pilot fares, fares implemented for the Pilot (1), and proposed fares for the remainder of the Pilot (2). No fare introduced with the Pilot is more than the fares that were in place prior to the Pilot. Therefore, all riders in the service area are paying equal to or less than the fares they were paying prior to the Pilot.

Table 1: Relevant Fare Types

| Fare Category | Pre Pilot | Go Glades Pilot ¹ | Go Glades Pilot ² |
|-------------------------------------|-----------|------------------------------|------------------------------|
| Base Fare – Fixed Route | \$2.00 | \$2.00 | \$2.00 |
| Reduced Fare – Fixed Route | \$1.00 | \$1.00 | \$1.00 |
| ADA ID – Fixed Route | \$0.00 | \$0.00 | \$0.00 |
| Base Fare – Go Glades (New) | N/A | \$1.00 | \$1.00 |
| Reduced Fare – Go Glades (New) | N/A | N/A | \$0.50 |
| Off-route service – Go Glades (New) | N/A | \$0.50 | \$0.50 |
| ADA ID Card – Go Glades (New) | N/A | \$0.00 | \$0.00 |
| Connection ADA Service* | \$3.50 | \$3.50 | \$3.50 |

*Note: Connection paratransit riders may ride fixed route and Go Glades free with valid ADA ID.

Other fares, such as daily and monthly passes and Transportation Disadvantaged fares, are all accepted on Go Glades and no changes to these apply. Similarly, the base and reduced fare for fixed route bus service remains in effect. A recommendation for the continuation of the Pilot is to include a reduced fare to be compliant with FTA "Half Fare" requirements. The FTA requires a half or reduced fare for seniors, persons with a disability, and persons with a valid Medicare card. The reduced fare is only required during non-peak service periods. However, to minimize confusion with the public and operational complexities, most transit systems adopt the reduced fare all day long. This would be the recommendation for Go Glades. Further, it is recommended that the reduced fare apply to all persons eligible as transportation disadvantaged per the State of Florida.

In addition, Palm Tran Connection riders pay \$3.50 for ADA eligible paratransit point-to-point services with a 24-hour advance service reservation. There are a total of 1,133 ADA eligible riders with addresses in the Glades region. Of these, all but 11 are also eligible as Transportation Disadvantaged based on low household income. Therefore, the majority (99%) of Connection ADA eligible customers are also qualified as low income.

With the Pilot, ADA eligible customers may elect to use Go Glades free with their ADA ID card and can request the service with as little as 2-hour advance notice. The intersection of Connection riders and Go Glades service is important as Go Glades offers a choice to Connection riders for a similar service at a reduced price (\$0.00) and with more immediate response time (2-hours).

Fare Equity Analysis: The results of the Title VI Fare Equity Analysis on the temporary Pilot fares finds no disproportionate adverse impact on Title VI protected populations (minority and low income households). The impacts of the temporary Pilot fare changes were equal across minority, low-income, and the general population. Further, the Results of the Fare Equity Analysis on the proposed fares, adding in the FTA "Half Fares", would not pose a disproportionate adverse impact on protected populations.

Table 2 reflects the population characteristics within the U.S. Census blockgroups within the Glades region. Percentages reflect duplicative counts where persons and households appear in more than one category (minority, not minority, low income, not low income).

Further, based on the U.S. Census Bureau American Community Survey Census blockgroup data within the Go Glades service area, 68.3% of riders are minority and 31.7% are not. In addition, 34.3% of Go Glades riders are Low Income, and 65.7% are not. This was calculated by examining the Go Glades population within the service area buffers along each Go Glades route. (See Table 3) Table 3 reflects the passenger minority and income characteristics for each Go Glades route. This is calculated by examining ridership by route and the population characteristics of the areas within the service ridership catchment buffer (3/4-mile centerline) for each route. The minority and income characteristics for each Go Glades route is reflected in the following tables.

Table 2: Population and Household Characteristics in the Glades Region (Duplicative Counts)

| Route/Service Area | Total Pop | Total Households | Percent Minority | Percent Low-Income |
|--------------------|-----------|------------------|------------------|--------------------|
| Go Glades 1 | 11,725 | 2,377 | 54% | 50% |
| Go Glades 2 | 15,357 | 2,771 | 74% | 35% |
| Go Glades 3 | 15,232 | 3,154 | 62% | 31% |
| Go Glades 4 | 8,024 | 1,705 | 69% | 31% |

* Counts are duplicative as persons fit into both minority and low income categories.

Table 3: Low Income and Minority Population within the Go Glades Service Area

| Route | Total Passengers | Low Income Passengers | NOT Low Income | Minority Passengers | NOT Minority |
|--------------------|---------------------|--------------------------|-------------------|------------------------|-----------------|
| Go Glades 1 | 851 | 426 | 426 | 460 | 391 |
| Go Glades 2 | 3,885 | 1,360 | 2,525 | 2,875 | 1,010 |
| Go Glades 3 | 1,940 | 601 | 1,339 | 1,203 | 737 |
| Go Glades 4 | 3,075 | 953 | 2,122 | 2,122 | 953 |
| Total Service Area | 9,751 | 3,340 | 6,411 | 6,659 | 3,092 |
| Percentages | | 34.3% | 65.7% | 68.3% | 31.7% |

Table 4 presents ridership, percent of riders, and revenue generated by fare type for each route and for the combined Go Glades routes within the service area. Note the deviation fare of \$0.50 is additive to the base fare and is charged for each pick-up and/or drop-off that is not at a designated Go Glades bus stop. The deviation fare is not charged for persons riding with an ADA ID card. Persons riding with a valid ADA ID card ride fixed route and Go Glades services free. Of the Go Glades ridership in March 2019, 65.8% paid the base fare of \$1.00, 5.3% paid the additional deviation fare of \$0.50, and 34.2% rode free with a valid ADA ID card.

Table 4: Riders by Fare Category by Go Glades Route

| March 2019 | Fare | GG-1 Riders | GG-2 Riders | GG-3 Riders | GG-4 Riders | Total Riders | Fare Revenue |
|---|--------|----------------|----------------|----------------|----------------|-----------------|-----------------|
| Base Fare & Riders | \$1.00 | 175 | 770 | 378 | 860 | 2,183 | \$2,183 |
| Base Fare Percent | | 63.6% | 55.6% | 77.3% | 73.5% | 65.8% | |
| Deviations Fare & Riders (additive to Base Fare) | \$0.50 | 10 | 90 | 11 | 65 | 176 | \$88 |
| Deviation Fare Percent | | 3.6% | 6.5% | 2.2% | 5.6% | 5.3% | |
| ADA ID Fare & Riders | \$0.00 | 100 | 616 | 111 | 310 | 1,137 | \$0 |
| ADA ID Percent | | 36.4% | 44.4% | 22.7% | 26.5% | 34.2% | |
| Total Riders/Revenue | | 275 | 1,386 | 489 | 1,170 | 3,320 | \$2,271 |

The population characteristics of the Go Glades ridership for minority and income status was inferred to fare payment usage to estimate minority and income status for the based fare and deviation fare. However, for riders using the ADA ID to access Go Glades, we inferred that 99% are low income based on Palm Tran Connection rider characteristics. Of the 1,133 Palm Tran Connection riders with an address in the Glades region, only 11 are not eligible for the Transportation Disadvantaged program. Therefore, 99% are low income (1,126 Go Glades riders). In terms of minority status, persons riding Go Glades with a with an ADA ID have been characterized consistent with the statistical minority status for riders within the service area. See Table 5.

Table 5: Riders by Fare Category

| Fare Type | Fare | Low Income | | Not Low Income | | Minority | | Not Minority | |
|----------------|--------|------------|-------|----------------|-------|----------|-------|--------------|-------|
| Base Fare - GG | \$1.00 | 748 | 34.3% | 1,435 | 65.7% | 1,491 | 68.3% | 692 | 31.7% |
| Deviation - GG | \$0.50 | 60 | 34.3% | 116 | 65.7% | 120 | 68.3% | 56 | 31.7% |
| ADA ID | \$0.00 | 1,126 | 99.0% | 11 | 1.0% | 776 | 68.3% | 361 | 31.7% |
| Total | | 1,197 | | 2,299 | | 2,387 | | 1,109 | |

* Deviations are additive to Base Fare; totals exceed unduplicated riders by the number of deviation fares.

Based on the data in Table 5, 99% of persons riding Go Glades with an ADA ID are low income and paying \$0.00 for Go Glades as opposed to \$3.50 on Palm Tran Connection. This is a significant benefit accruing to a significant low income and disabled population. As per Table 6 the average fare change is comparable for all minority and income status groups for each fare type. Compared to the fares in place for services prior to the start of the Pilot (Fare 1), the introduction of the Go Glades base fare (\$1.00),

deviation fee (\$0.50), and the proposed half fare (\$0.50), the new fares are all equal to or less than the fares in effect for base fixed route (\$2.00) and reduced fixed route (\$1.00) service. In addition, for persons with an ADA ID, the fare change is effectively a reduction of \$3.50 for persons who select to ride Go Glades rather than Connection. The reduction of \$3.50 may accrue to all ADA eligible Palm Tran Connection riders in the Glades, 99% of whom are low income. Further, 34.2% of Go Glades riders (1,137 passenger trips) rode Go Glades for free using their ADA ID card.

Table 6: Change in Average Fare

| | Average Fare Change | | | | | |
|---|---------------------|------------------|----------------------|----------------------|----------------------|----------------------|
| Route | Fare 1 Pre-pilot | Fare 2 Pilot | Minority | Non-Minority | Low-Income | Non Low-Income |
| Base Fare | | | | | | |
| - Fixed Route | \$2.00 | \$2.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| - Go Glades | | \$1.00 | (\$1.00) | (\$1.00) | (\$1.00) | (\$1.00) |
| Reduced Fare | | | | | | |
| - Fixed Route | \$1.00 | \$1.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| - Go Glades | | \$0.50 | (\$0.50) | (\$0.50) | (\$0.50) | (\$0.50) |
| ADA ID | | | | | | |
| - Fixed Route | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| - Go Glades | \$3.50 | \$0.00 | (\$3.50) | (\$3.50) | (\$3.50) | (\$3.50) |
| Deviation Fee – no fixed route equivalent service | \$2.00 \$1.00 | \$0.50 \$0.50 | (\$1.50) (\$0.50) | (\$1.50) (\$0.50) | (\$1.50) (\$0.50) | (\$1.50) (\$0.50) |

Fare Equity Analysis Results: The results of the Title VI analysis found *no disproportionate adverse impacts on low income or minority populations* for any Pilot fare changes. The fare changes described above result in an equal impact for all groups using Palm Trans’ services. Further, the recommended addition of the “Half Fare” for seniors, disabled persons, and persons riding with a valid Medicare card, is consistent with FTA requirements and would not pose an adverse disproportionate impact to low income and minority riders. It is recommended that the reduced fare apply equally to all persons eligible as Transportation Disadvantaged per State of Florida. Information pertaining to Title VI requirements and the methodology employed in this analysis is provided in Attachment A.

Attachment A – Title VI Requirements and Methodology

Exhibit “A”

1. Identify existing Title VI areas within Palm Beach County comprised of Census blockgroups and estimate the total number of low-income and minority passengers based upon the demographics of blockgroups surrounding each Go Glades route.
2. Under FTA rules, any fare changes are subject to a fare equity analysis review regardless of if the fare changes represent an increase or decrease in cost of the fare.
3. Under FTA rules, any fare media changes are subject to a fare equity analysis review regardless of if the fare media changes represent an increase or decrease in cost of the fare. In the case of fare media changes, equal access to the new fare media is of primary focus.
4. Using FTA's Fare Equity Analysis guidance and service planning GIS analyses, calculate impacts of proposed fare changes on Title VI riders, including:
 - a. Determine the number and percent of users of each fare media being changed;
 - b. Review fares before and after the change;
 - c. Compare the differences for each particular fare change and change in fare media – minority riders
 - d. Compare the differences for each particular fare change and change in fare media – low-income riders
5. Compare impacts on Title VI protected groups to impacts on the general system
 - a. If impacts to Title VI protected groups are greater than 20% of impacts on the general public, per Palm Tran policy, then an adverse disproportionate impact exists
 - b. If disproportionate impacts do not exist, then changes are in compliance with Title VI
6. For disproportionate impacts, identify reasonable means to mitigate the adverse impacts on low income and minority areas.

Title VI Service and Fare Equity Requirements: Transit providers within service areas containing more than 200,000 residents and/or operating 50+ vehicles during peak periods are required under Title VI of the Civil Rights Act of 1964 to complete an equity analysis of any major service change or fare change. The analysis must be completed during the programming stages, regardless of the proposed amount of increase or in the case of service changes, a service equity analysis is required for any major service change. Requirements for major service changes differ based on the magnitude of changes and established thresholds. The purpose of an equity analysis is to ensure that any potential fare structures or service changes are consistent with Title VI of the Civil Rights Act of 1964 and are fair and equitable to all citizens, regardless of race, color, or national origin. The objectives of FTA's Title VI Program, as set forth in FTA Circular 4702.1B, "Title VI Program Guidelines for Federal Transit Administration Recipients," are:

- To ensure that FTA-assisted benefits and related services are made available and are equitably distributed without regard to race, color, or national origin.
- To ensure that the level and quality of FTA-assisted transit services are sufficient to provide equal access and mobility for any person without regard to race, color, or national origin.
- To ensure that opportunities to participate in the transit planning and decision-making process are provided to persons without regard to race, color, or national origin.
- To ensure that decisions on the location of transit services and facilities are made without regard to race, color, or national origin.
- To ensure that corrective and remedial action is taken by all applicants and recipients of FTA assistance to prevent discriminatory treatment of any beneficiary based on race, color, or national origin.

An equity analysis must be completed to determine whether planned changes will have a disproportionate impact on minority populations. Although low-income populations are not a protected class under Title VI, it is recognized through statistical analysis that there is an inherent overlap of environmental justice (EJ) principles with low income populations. Additionally, because it is important to evaluate the impacts of service and fare changes on passengers who are transit-dependent, FTA requires transit providers to evaluate proposed service and fare changes to determine if low-income populations will bear a disproportionate burden of the changes. Therefore, an equity analysis determines whether there is a disproportionate burden between the existing fare or service and the proposed fare or service change on low-income riders.

Fare Equity Methodology: The fare equity analysis compares the effects of the temporary Go Glades fare on minority and low-income populations separately. This analysis is required since the Pilot is extending beyond six months and FTA requires that temporary fares that are in place beyond six months be subject to a Fare Equity analysis. The methodology used is as noted:

RESOLUTION NO. R -

**A RESOLUTION OF THE BOARD OF COUNTY COMMISSIONERS
OF PALM BEACH COUNTY (BCC), FLORIDA, APPROVING THE
TITLE VI FARE EQUITY ANALYSIS REQUIRED BY THE FEDERAL
TRANSIT ADMINISTRATION SHOWING THAT THE FARES FOR
THE PILOT FLEX ROUTE AND DIAL-A-RIDE SERVICE IN THE
GLADES REGION, GO GLADES, HAS NO DISPARATE IMPACT TO
EITHER MINORITY OR LOW-INCOME POPULATIONS;
APPROVING THE FARES WITH AN EFFECTIVE DATE OF JUNE 18,
2019**

WHEREAS, on December 18, 2018, the BCC conducted a public hearing and approved the Title VI Service Equity Analysis for the Route Performance Maximization Initiative (RPM), a major service change to Palm Tran's fixed route system, which included the implementation of a new innovative flex routing system pilot program in the Glades Region of Palm Beach County; and

WHEREAS, on December, 21, 2018, Palm Tran introduced the new pilot service which included a promotional and temporary fare that was less than the prior fares established for Palm Tran's fixed route services in the Glades Region; and

WHEREAS, Title VI of the Civil Rights Act of 1964 (Title VI) and Federal Transit Administration (FTA) Circular 4702.1B require transit providers that operate 50 or more fixed route vehicles in peak service and are located in a service area with a population of 200,000 or more to evaluate the impacts of fare changes to determine whether the changes will have a disparate impact on the basis of race, color, or national origin, and whether low-income populations will bear a disproportionate burden of the changes; and

WHEREAS, a fare equity analysis is conducted to further ensure that any potential fare changes are consistent with Title VI and are fair and equitable to all citizens, regardless of race, color or national origin, and low-income; and

WHEREAS, the County retained the consultant, Tindale Oliver, to conduct the fare equity analysis during the pilot phase of the Go Glades Flex and Dial-A-Ride service in accordance with Title VI, FTA Circular 4702.1B, and the County's Public Transit System's Title VI program; and

WHEREAS, the results of the Title VI fare equity analysis performed on the fare changes associated with the Go Glades Flex and Dial-A-Ride service found no disproportionate adverse impacts on low-income or minority populations for any fare change; and

WHEREAS, the impacts of the pilot Go Glades Flex and Dial-A-Ride service and fare changes improve access to transit services for low-income and minority populations and equally impacts all groups using Palm Tran's services; and

WHEREAS, the BCC has given due consideration to the information and recommendations received from staff, any relevant comments and supporting information received from the public, and evaluated the data, information and results of the Title VI fare equity analysis; and

WHEREAS, the BCC approves the fare equity analysis, accepts its results and further concludes that the fare changes will reasonably further the desired outcome of providing better access to mobility and more efficient service with no adverse equity impacts on minority and low-income populations.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COUNTY COMMISSIONERS OF PALM BEACH COUNTY, FLORIDA, that:

1. The BCC hereby approves and adopts the Title VI Fare Equity Analysis (attached hereto as Exhibit "A") presented by Palm Tran's consultant, Tindale Oliver, in accordance with Palm Beach County's Title VI Program and FTA Circular 4702.1B.
2. The BCC approves the proposed fare changes shown in Table 1 of the Go Glades Pilot – Fare Analysis.
3. This Resolution shall take effect immediately upon its adoption.

The foregoing Resolution was offered by Commissioner _____, who moved its adoption. The motion was seconded by Commissioner _____, and upon being put to a vote, the vote was as follows:

| | |
|--------------------------------------|-------|
| Commissioner Mack Bernard, Mayor | _____ |
| Commissioner Dave Kerner, Vice Mayor | _____ |
| Commissioner Hal R. Valeche | _____ |
| Commissioner Robert Weinroth | _____ |
| Commissioner Melissa McKinlay | _____ |
| Commissioner Gregg Weiss | _____ |
| Commissioner Mary Lou Berger | _____ |

The Mayor thereupon declared the resolution duly passed and adopted this _____ day of _____, 2019.

APPROVED AS TO FORM AND
LEGAL SUFFICIENCY

By:  _____
County Attorney

PALM BEACH COUNTY, FLORIDA
BY ITS BOARD OF COMMISSIONERS
Sharon R. Bock, Clerk and Comptroller

By: _____
Deputy Clerk

RESOLUTION NO. R -

A RESOLUTION OF THE BOARD OF COUNTY COMMISSIONERS OF PALM BEACH COUNTY (BCC), FLORIDA, APPROVING THE TITLE VI FARE EQUITY ANALYSIS REQUIRED BY THE FEDERAL TRANSIT ADMINISTRATION SHOWING THAT THE FARES FOR THE PILOT FLEX ROUTE AND DIAL-A-RIDE SERVICE IN THE GLADES REGION, GO GLADES, HAS NO DISPARATE IMPACT TO EITHER MINORITY OR LOW-INCOME POPULATIONS; APPROVING THE FARES WITH AN EFFECTIVE DATE OF JUNE 18, 2019

WHEREAS, on December 18, 2018, the BCC conducted a public hearing and approved the Title VI Service Equity Analysis for the Route Performance Maximization Initiative (RPM), a major service change to Palm Tran's fixed route system, which included the implementation of a new innovative flex routing system pilot program in the Glades Region of Palm Beach County; and

WHEREAS, on December, 21, 2018, Palm Tran introduced the new pilot service which included a promotional and temporary fare that was less than the prior fares established for Palm Tran's fixed route services in the Glades Region; and

WHEREAS, Title VI of the Civil Rights Act of 1964 (Title VI) and Federal Transit Administration (FTA) Circular 4702.1B require transit providers that operate 50 or more fixed route vehicles in peak service and are located in a service area with a population of 200,000 or more to evaluate the impacts of fare changes to determine whether the changes will have a disparate impact on the basis of race, color, or national origin, and whether low-income populations will bear a disproportionate burden of the changes; and

WHEREAS, a fare equity analysis is conducted to further ensure that any potential fare changes are consistent with Title VI and are fair and equitable to all citizens, regardless of race, color or national origin, and low-income; and

WHEREAS, the County retained the consultant, Tindale Oliver, to conduct the fare equity analysis during the pilot phase of the Go Glades Flex and Dial-A-Ride service in accordance with Title VI, FTA Circular 4702.1B, and the County's Public Transit System's Title VI program; and

WHEREAS, the results of the Title VI fare equity analysis performed on the fare changes associated with the Go Glades Flex and Dial-A-Ride service found no disproportionate adverse impacts on low-income or minority populations for any fare change; and

WHEREAS, the impacts of the pilot Go Glades Flex and Dial-A-Ride service and fare changes improve access to transit services for low-income and minority populations and equally impacts all groups using Palm Tran's services; and

WHEREAS, the BCC has given due consideration to the information and recommendations received from staff, any relevant comments and supporting information received from the public, and evaluated the data, information and results of the Title VI fare equity analysis; and

WHEREAS, the BCC approves the fare equity analysis, accepts its results and further concludes that the fare changes will reasonably further the desired outcome of providing better access to mobility and more efficient service with no adverse equity impacts on minority and low-income populations.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COUNTY COMMISSIONERS OF PALM BEACH COUNTY, FLORIDA, that:

1. The BCC hereby approves and adopts the Title VI Fare Equity Analysis (attached hereto as Exhibit "A") presented by Palm Tran's consultant, Tindale Oliver, in accordance with Palm Beach County's Title VI Program and FTA Circular 4702.1B.
2. The BCC approves the proposed fare changes shown in Table 1 of the Go Glades Pilot – Fare Analysis.
3. This Resolution shall take effect immediately upon its adoption.

The foregoing Resolution was offered by Commissioner _____, who moved its adoption. The motion was seconded by Commissioner _____, and upon being put to a vote, the vote was as follows:

| | |
|--------------------------------------|-------|
| Commissioner Mack Bernard, Mayor | _____ |
| Commissioner Dave Kerner, Vice Mayor | _____ |
| Commissioner Hal R. Valeche | _____ |
| Commissioner Robert Weinroth | _____ |
| Commissioner Melissa McKinlay | _____ |
| Commissioner Gregg Weiss | _____ |
| Commissioner Mary Lou Berger | _____ |

The Mayor thereupon declared the resolution duly passed and adopted this _____ day of _____, 2019.

APPROVED AS TO FORM AND
LEGAL SUFFICIENCY

By:  _____
County Attorney

PALM BEACH COUNTY, FLORIDA
BY ITS BOARD OF COMMISSIONERS
Sharon R. Bock, Clerk and Comptroller

By: _____
Deputy Clerk

Exhibit “A”

Title VI Service and Fare Equity Requirements: Transit providers within service areas containing more than 200,000 residents and/or operating 50+ vehicles during peak periods are required under Title VI of the Civil Rights Act of 1964 to complete an equity analysis of any major service change or fare change. The analysis must be completed during the programming stages, regardless of the proposed amount of increase or in the case of service changes, a service equity analysis is required for any major service change. Requirements for major service changes differ based on the magnitude of changes and established thresholds. The purpose of an equity analysis is to ensure that any potential fare structures or service changes are consistent with Title VI of the Civil Rights Act of 1964 and are fair and equitable to all citizens, regardless of race, color, or national origin. The objectives of FTA's Title VI Program, as set forth in FTA Circular 4702.1B, "Title VI Program Guidelines for Federal Transit Administration Recipients," are:

- To ensure that FTA-assisted benefits and related services are made available and are equitably distributed without regard to race, color, or national origin.
- To ensure that the level and quality of FTA-assisted transit services are sufficient to provide equal access and mobility for any person without regard to race, color, or national origin.
- To ensure that opportunities to participate in the transit planning and decision-making process are provided to persons without regard to race, color, or national origin.
- To ensure that decisions on the location of transit services and facilities are made without regard to race, color, or national origin.
- To ensure that corrective and remedial action is taken by all applicants and recipients of FTA assistance to prevent discriminatory treatment of any beneficiary based on race, color, or national origin.

An equity analysis must be completed to determine whether planned changes will have a disproportionate impact on minority populations. Although low-income populations are not a protected class under Title VI, it is recognized through statistical analysis that there is an inherent overlap of environmental justice (EJ) principles with low income populations. Additionally, because it is important to evaluate the impacts of service and fare changes on passengers who are transit-dependent, FTA requires transit providers to evaluate proposed service and fare changes to determine if low-income populations will bear a disproportionate burden of the changes. Therefore, an equity analysis determines whether there is a disproportionate burden between the existing fare or service and the proposed fare or service change on low-income riders.

Fare Equity Methodology: The fare equity analysis compares the effects of the temporary Go Glades fare on minority and low-income populations separately. This analysis is required since the Pilot is extending beyond six months and FTA requires that temporary fares that are in place beyond six months be subject to a Fare Equity analysis. The methodology used is as noted:

1. Identify existing Title VI areas within Palm Beach County comprised of Census blockgroups and estimate the total number of low-income and minority passengers based upon the demographics of blockgroups surrounding each Go Glades route.

2. Under FTA rules, any fare changes are subject to a fare equity analysis review regardless of if the fare changes represent an increase or decrease in cost of the fare.
3. Under FTA rules, any fare media changes are subject to a fare equity analysis review regardless of if the fare media changes represent an increase or decrease in cost of the fare. In the case of fare media changes, equal access to the new fare media is of primary focus.
4. Using FTA's Fare Equity Analysis guidance and service planning GIS analyses, calculate impacts of proposed fare changes on Title VI riders, including:
 - a. Determine the number and percent of users of each fare media being changed;
 - b. Review fares before and after the change;
 - c. Compare the differences for each particular fare change and change in fare media – minority riders
 - d. Compare the differences for each particular fare change and change in fare media – low-income riders
5. Compare impacts on Title VI protected groups to impacts on the general system
 - a. If impacts to Title VI protected groups are greater than 20% of impacts on the general public, per Palm Tran policy, then an adverse disproportionate impact exists
 - b. If disproportionate impacts do not exist, then changes are in compliance with Title VI
6. For disproportionate impacts, identify reasonable means to mitigate the adverse impacts on low income and minority areas.

5/31/2019 (revised 6/11/2019)

To: Chad Hockman, Senior Manager of Paratransit

From: Randall Farwell, Senior Associate *R. Farwell*

Re: Go Glades Pilot - Fare Analysis

Overview of Pilot and Fares: Palm Tran introduced the Go Glades Flex Service Pilot (the Pilot) on December 21, 2018 with Palm Beach County Board of County Commissioners (BCC) approval. The Pilot was approved for a 12 month period to assess a new service delivery strategy in the Glades to better serve general public and ADA mobility needs in conjunction with existing fixed route service.

The Pilot included introduction of new fares. The Federal Transit Administration (FTA) requirements for fare changes (new fares, and changes to fares) requires that a temporary fare be subject to a Title VI Fare Equity Analysis if the fare is to be in place for more than a six month period. As the Pilot extends beyond six months, a Title VI Fare Equity Analysis was conducted on the temporary Pilot fares. In addition, Palm Tran committed to brief the BCC after six months of the Pilot to provide a report on the service and to present the findings of a Title VI Fare Equity Analysis for the temporary fare so that the fare may extend in through the end of the Pilot.

The fares implemented for the Pilot included a new Go Glades: base fare; off-route fee; and an extension of the “free” fare on fixed route to Go Glades service for persons showing a valid Americans with Disabilities Act (ADA) ID card. Table 1 presents relevant pre-pilot fares, fares implemented for the Pilot (1), and proposed fares for the remainder of the Pilot (2). No fare introduced with the Pilot is more than the fares that were in place prior to the Pilot. Therefore, all riders in the service area are paying equal to or less than the fares they were paying prior to the Pilot.

Table 1: Relevant Fare Types

| Fare Category | Pre Pilot | Go Glades Pilot ¹ | Go Glades Pilot ² |
|-------------------------------------|-----------|------------------------------|------------------------------|
| Base Fare – Fixed Route | \$2.00 | \$2.00 | \$2.00 |
| Reduced Fare – Fixed Route | \$1.00 | \$1.00 | \$1.00 |
| ADA ID – Fixed Route | \$0.00 | \$0.00 | \$0.00 |
| Base Fare – Go Glades (New) | N/A | \$1.00 | \$1.00 |
| Reduced Fare – Go Glades (New) | N/A | N/A | \$0.50 |
| Off-route service – Go Glades (New) | N/A | \$0.50 | \$0.50 |
| ADA ID Card – Go Glades (New) | N/A | \$0.00 | \$0.00 |
| Connection ADA Service* | \$3.50 | \$3.50 | \$3.50 |

*Note: Connection paratransit riders may ride fixed route and Go Glades free with valid ADA ID.

Other fares, such as daily and monthly passes and Transportation Disadvantaged fares, are all accepted on Go Glades and no changes to these apply. Similarly, the base and reduced fare for fixed route bus service remains in effect. A recommendation for the continuation of the Pilot is to include a reduced fare to be compliant with FTA “Half Fare” requirements. The FTA requires a half or reduced fare for seniors, persons with a disability, and persons with a valid Medicare card. The reduced fare is only required during non-peak service periods. However, to minimize confusion with the public and operational complexities, most transit systems adopt the reduced fare all day long. This would be the recommendation for Go Glades. Further, it is recommended that the reduced fare apply to all persons eligible as transportation disadvantaged per the State of Florida.

In addition, Palm Tran Connection riders pay \$3.50 for ADA eligible paratransit point-to-point services with a 24-hour advance service reservation. There are a total of 1,133 ADA eligible riders with addresses in the Glades region. Of these, all but 11 are also eligible as Transportation Disadvantaged based on low household income. Therefore, the majority (99%) of Connection ADA eligible customers are also qualified as low income.

With the Pilot, ADA eligible customers may elect to use Go Glades free with their ADA ID card and can request the service with as little as 2-hour advance notice. The intersection of Connection riders and Go Glades service is important as Go Glades offers a choice to Connection riders for a similar service at a reduced price (\$0.00) and with more immediate response time (2-hours).

Fare Equity Analysis: The results of the Title VI Fare Equity Analysis on the temporary Pilot fares finds no disproportionate adverse impact on Title VI protected populations (minority and low income households). The impacts of the temporary Pilot fare changes were equal across minority, low-income, and the general population. Further, the Results of the Fare Equity Analysis on the proposed fares, adding in the FTA “Half Fares”, would not pose a disproportionate adverse impact on protected populations.

Table 2 reflects the population characteristics within the U.S. Census blockgroups within the Glades region. Percentages reflect duplicative counts where persons and households appear in more than one category (minority, not minority, low income, not low income).

Further, based on the U.S. Census Bureau American Community Survey Census blockgroup data within the Go Glades service area, 68.3% of riders are minority and 31.7% are not. In addition, 34.3% of Go Glades riders are Low Income, and 65.7% are not. This was calculated by examining the Go Glades population within the service area buffers along each Go Glades route. (See Table 3) Table 3 reflects the passenger minority and income characteristics for each Go Glades route. This is calculated by examining ridership by route and the population characteristics of the areas within the service ridership catchment buffer (3/4-mile centerline) for each route. The minority and income characteristics for each Go Glades route is reflected in the following tables.

Table 2: Population and Household Characteristics in the Glades Region (Duplicative Counts)

| Route/Service Area | Total Pop | Total Households | Percent Minority | Percent Low-Income |
|--------------------|-----------|------------------|------------------|--------------------|
| Go Glades 1 | 11,725 | 2,377 | 54% | 50% |
| Go Glades 2 | 15,357 | 2,771 | 74% | 35% |
| Go Glades 3 | 15,232 | 3,154 | 62% | 31% |
| Go Glades 4 | 8,024 | 1,705 | 69% | 31% |

* Counts are duplicative as persons fit into both minority and low income categories.

Table 3: Low Income and Minority Population within the Go Glades Service Area

| Route | Total Passengers | Low Income Passengers | NOT Low Income | Minority Passengers | NOT Minority |
|--------------------|---------------------|--------------------------|-------------------|------------------------|-----------------|
| Go Glades 1 | 851 | 426 | 426 | 460 | 391 |
| Go Glades 2 | 3,885 | 1,360 | 2,525 | 2,875 | 1,010 |
| Go Glades 3 | 1,940 | 601 | 1,339 | 1,203 | 737 |
| Go Glades 4 | 3,075 | 953 | 2,122 | 2,122 | 953 |
| Total Service Area | 9,751 | 3,340 | 6,411 | 6,659 | 3,092 |
| Percentages | | 34.3% | 65.7% | 68.3% | 31.7% |

Table 4 presents ridership, percent of riders, and revenue generated by fare type for each route and for the combined Go Glades routes within the service area. Note the deviation fare of \$0.50 is additive to the base fare and is charged for each pick-up and/or drop-off that is not at a designated Go Glades bus stop. The deviation fare is not charged for persons riding with an ADA ID card. Persons riding with a valid ADA ID card ride fixed route and Go Glades services free. Of the Go Glades ridership in March 2019, 65.8% paid the base fare of \$1.00, 5.3% paid the additional deviation fare of \$0.50, and 34.2% rode free with a valid ADA ID card.

Table 4: Riders by Fare Category by Go Glades Route

| March 2019 | Fare | GG-1 Riders | GG-2 Riders | GG-3 Riders | GG-4 Riders | Total Riders | Fare Revenue |
|---|--------|----------------|----------------|----------------|----------------|-----------------|-----------------|
| Base Fare & Riders | \$1.00 | 175 | 770 | 378 | 860 | 2,183 | \$2,183 |
| Base Fare Percent | | 63.6% | 55.6% | 77.3% | 73.5% | 65.8% | |
| Deviations Fare & Riders (additive to Base Fare) | \$0.50 | 10 | 90 | 11 | 65 | 176 | \$88 |
| Deviation Fare Percent | | 3.6% | 6.5% | 2.2% | 5.6% | 5.3% | |
| ADA ID Fare & Riders | \$0.00 | 100 | 616 | 111 | 310 | 1,137 | \$0 |
| ADA ID Percent | | 36.4% | 44.4% | 22.7% | 26.5% | 34.2% | |
| Total Riders/Revenue | | 275 | 1,386 | 489 | 1,170 | 3,320 | \$2,271 |

The population characteristics of the Go Glades ridership for minority and income status was inferred to fare payment usage to estimate minority and income status for the based fare and deviation fare. However, for riders using the ADA ID to access Go Glades, we inferred that 99% are low income based on Palm Tran Connection rider characteristics. Of the 1,133 Palm Tran Connection riders with an address in the Glades region, only 11 are not eligible for the Transportation Disadvantaged program. Therefore, 99% are low income (1,126 Go Glades riders). In terms of minority status, persons riding Go Glades with a with an ADA ID have been characterized consistent with the statistical minority status for riders within the service area. See Table 5.

Table 5: Riders by Fare Category

| Fare Type | Fare | Low Income | | Not Low Income | | Minority | | Not Minority | |
|----------------|--------|------------|-------|----------------|-------|----------|-------|--------------|-------|
| Base Fare - GG | \$1.00 | 748 | 34.3% | 1,435 | 65.7% | 1,491 | 68.3% | 692 | 31.7% |
| Deviation - GG | \$0.50 | 60 | 34.3% | 116 | 65.7% | 120 | 68.3% | 56 | 31.7% |
| ADA ID | \$0.00 | 1,126 | 99.0% | 11 | 1.0% | 776 | 68.3% | 361 | 31.7% |
| Total | | 1,197 | | 2,299 | | 2,387 | | 1,109 | |

* Deviations are additive to Base Fare; totals exceed unduplicated riders by the number of deviation fares.

Based on the data in Table 5, 99% of persons riding Go Glades with an ADA ID are low income and paying \$0.00 for Go Glades as opposed to \$3.50 on Palm Tran Connection. This is a significant benefit accruing to a significant low income and disabled population. As per Table 6 the average fare change is comparable for all minority and income status groups for each fare type. Compared to the fares in place for services prior to the start of the Pilot (Fare 1), the introduction of the Go Glades base fare (\$1.00),

deviation fee (\$0.50), and the proposed half fare (\$0.50), the new fares are all equal to or less than the fares in effect for base fixed route (\$2.00) and reduced fixed route (\$1.00) service. In addition, for persons with an ADA ID, the fare change is effectively a reduction of \$3.50 for persons who select to ride Go Glades rather than Connection. The reduction of \$3.50 may accrue to all ADA eligible Palm Tran Connection riders in the Glades, 99% of whom are low income. Further, 34.2% of Go Glades riders (1,137 passenger trips) rode Go Glades for free using their ADA ID card.

Table 6: Change in Average Fare

| | Average Fare Change | | | | | |
|---|---------------------|------------------|----------------------|----------------------|----------------------|----------------------|
| Route | Fare 1 Pre-pilot | Fare 2 Pilot | Minority | Non-Minority | Low-Income | Non Low-Income |
| Base Fare | | | | | | |
| - Fixed Route | \$2.00 | \$2.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| - Go Glades | | \$1.00 | (\$1.00) | (\$1.00) | (\$1.00) | (\$1.00) |
| Reduced Fare | | | | | | |
| - Fixed Route | \$1.00 | \$1.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| - Go Glades | | \$0.50 | (\$0.50) | (\$0.50) | (\$0.50) | (\$0.50) |
| ADA ID | | | | | | |
| - Fixed Route | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| - Go Glades | \$3.50 | \$0.00 | (\$3.50) | (\$3.50) | (\$3.50) | (\$3.50) |
| Deviation Fee – no fixed route equivalent service | \$2.00 \$1.00 | \$0.50 \$0.50 | (\$1.50) (\$0.50) | (\$1.50) (\$0.50) | (\$1.50) (\$0.50) | (\$1.50) (\$0.50) |

Fare Equity Analysis Results: The results of the Title VI analysis found *no disproportionate adverse impacts on low income or minority populations* for any Pilot fare changes. The fare changes described above result in an equal impact for all groups using Palm Trans’ services. Further, the recommended addition of the “Half Fare” for seniors, disabled persons, and persons riding with a valid Medicare card, is consistent with FTA requirements and would not pose an adverse disproportionate impact to low income and minority riders. It is recommended that the reduced fare apply equally to all persons eligible as Transportation Disadvantaged per State of Florida. Information pertaining to Title VI requirements and the methodology employed in this analysis is provided in Attachment A.



planning | design | engineering

GREAT INSIGHTS. GREATER OUTCOMES.

Attachment A – Title VI Requirements and Methodology

TAMPA BALTIMORE BARTOW FORT LAUDERDALE JACKSONVILLE MIAMI NAPLES
SEATTLE

3000 Spring Park Rd #48056 | Jacksonville, FL 32247 | (904) 521-6031

www.tindaleoliver.com

Title VI Service and Fare Equity Requirements: Transit providers within service areas containing more than 200,000 residents and/or operating 50+ vehicles during peak periods are required under Title VI of the Civil Rights Act of 1964 to complete an equity analysis of any major service change or fare change. The analysis must be completed during the programming stages, regardless of the proposed amount of increase or in the case of service changes, a service equity analysis is required for any major service change. Requirements for major service changes differ based on the magnitude of changes and established thresholds. The purpose of an equity analysis is to ensure that any potential fare structures or service changes are consistent with Title VI of the Civil Rights Act of 1964 and are fair and equitable to all citizens, regardless of race, color, or national origin. The objectives of FTA's Title VI Program, as set forth in FTA Circular 4702.1B, "Title VI Program Guidelines for Federal Transit Administration Recipients," are:

- To ensure that FTA-assisted benefits and related services are made available and are equitably distributed without regard to race, color, or national origin.
- To ensure that the level and quality of FTA-assisted transit services are sufficient to provide equal access and mobility for any person without regard to race, color, or national origin.
- To ensure that opportunities to participate in the transit planning and decision-making process are provided to persons without regard to race, color, or national origin.
- To ensure that decisions on the location of transit services and facilities are made without regard to race, color, or national origin.
- To ensure that corrective and remedial action is taken by all applicants and recipients of FTA assistance to prevent discriminatory treatment of any beneficiary based on race, color, or national origin.

An equity analysis must be completed to determine whether planned changes will have a disproportionate impact on minority populations. Although low-income populations are not a protected class under Title VI, it is recognized through statistical analysis that there is an inherent overlap of environmental justice (EJ) principles with low income populations. Additionally, because it is important to evaluate the impacts of service and fare changes on passengers who are transit-dependent, FTA requires transit providers to evaluate proposed service and fare changes to determine if low-income populations will bear a disproportionate burden of the changes. Therefore, an equity analysis determines whether there is a disproportionate burden between the existing fare or service and the proposed fare or service change on low-income riders.

Fare Equity Methodology: The fare equity analysis compares the effects of the temporary Go Glades fare on minority and low-income populations separately. This analysis is required since the Pilot is extending beyond six months and FTA requires that temporary fares that are in place beyond six months be subject to a Fare Equity analysis. The methodology used is as noted:

1. Identify existing Title VI areas within Palm Beach County comprised of Census blockgroups and estimate the total number of low-income and minority passengers based upon the demographics of blockgroups surrounding each Go Glades route.

2. Under FTA rules, any fare changes are subject to a fare equity analysis review regardless of if the fare changes represent an increase or decrease in cost of the fare.
3. Under FTA rules, any fare media changes are subject to a fare equity analysis review regardless of if the fare media changes represent an increase or decrease in cost of the fare. In the case of fare media changes, equal access to the new fare media is of primary focus.
4. Using FTA's Fare Equity Analysis guidance and service planning GIS analyses, calculate impacts of proposed fare changes on Title VI riders, including:
 - a. Determine the number and percent of users of each fare media being changed;
 - b. Review fares before and after the change;
 - c. Compare the differences for each particular fare change and change in fare media – minority riders
 - d. Compare the differences for each particular fare change and change in fare media – low-income riders
5. Compare impacts on Title VI protected groups to impacts on the general system
 - a. If impacts to Title VI protected groups are greater than 20% of impacts on the general public, per Palm Tran policy, then an adverse disproportionate impact exists
 - b. If disproportionate impacts do not exist, then changes are in compliance with Title VI
6. For disproportionate impacts, identify reasonable means to mitigate the adverse impacts on low income and minority areas.