

VENTURA COUNTY TRANSPORTATION COMMISSION Transit Operators Advisory Committee (TRANSCOM)

TRANSIT INTEGRATION AND EFFICIENCY STUDY (TIES) Operators Working Group

AGENDA

The meeting will be via ZOOM Webinar

https://us02web.zoom.us/j/89309724811?pwd=R1AzRWVNbVdBL0V0allXODArK1VuQT09

WEDNESDAY, May 12, 2021 1:30 PM

In light of Governor Newsom's State of Emergency declaration regarding the COVID-19 outbreak and in accordance with Executive Order N-29-20 and the Guidance for Gatherings issued by the California Department of Public Health committee panelists will participate in the meeting from individual remote locations, which is in accordance with the Governor's Executive Order. Members of the public are encouraged to attend the meeting remotely. Persons who wish to address the TRANSCOM committee on an item to be considered at this meeting are asked to submit comments in writing to the committee at vvega@goventura.org by 4:30PM, Tuesday May 11, 2021. Due to the current circumstances if you would like to participate in a verbal public comment on any item on the agenda during the meeting, please email your public comment to wvega@goventura.org. Any public comment received will be read into the record during the public comment portion of this meeting. In compliance with the Americans with Disabilities Act and Government Code Section 54954.2, if special assistance is needed to participate in the TRANSCOM meeting, please contact VCTC staff (805) 642-1591 ext. 118. Notification of at least 48 hours prior to meeting time will assist staff in assuring that reasonable arrangements can be made to provide accessibility to the meeting.

ITEM 1 CALL TO ORDER

ITEM 2 INTRODUCTIONS & ANNOUNCEMENTS

ITEM 3 PUBLIC COMMENT

ITEM 4 AGENDA ADJUSTMENTS

ITEM 5 APPROVAL OF MINUTES – For Action

• Waive the reading and approve the minutes of the April 14, 2021 meeting.

ITEM 6 ADA CERTIFICATION SERVICES PROGRAM – Verbal Update

Receive and file.

ITEM 7 DISTRIBUTION OF AMERICAN RELIEF PLAN (ARP) ACT FUNDS – For Action

In compliance with the Americans with Disabilities Act and Government Code Section 54954.2, if special assistance is needed to participate in a Committee meeting, please contact the Clerk of the Committee at (805) 642-1591 ext. 118. Notification of at least 48 hours prior to meeting time will assist staff in assuring that reasonable arrangements can be made to provide accessibility at the meeting.

- Approve distribution of federal relief funds as shown in the Attachment A table.
- FISCAL YEAR (FY) PROGRAM OF PROJECTS (POP) DEVELOPMENT PROCESS Verbal Update

 Receive and File.
- ITEM 9 REVISION TO LOW CARBON TRANSIT OPERATIONS PROGRAM (LCTOP) FISCAL YEAR (FY) 2020/21 PROGRAM For Action
 - Ratify the revised Ventura County Transportation Commission (VCTC) FY 2020/21 Low Carbon Transit Operations Program (LCTOP) Allocation Request of \$886,110 to fund the College Ride Program.
- ITEM 10 COMMENT REGARDING CENSUS BUREAU URBANIZED AREA DEFINITION CRITERIA For Action
 - Approve the attached comment to the United States Census Bureau regarding the proposed policy for redefining urbanized areas based on 2020 Census data.
- ITEM 11 TRANSIT INTEGRATION AND EFFICIENCY STUDY (TIES) OPERATORS WORKING GROUP MEETING
 - Transit Trends Report Fehr and Peers

In compliance with the Americans with Disabilities Act and Government Code Section 54954.2, if special assistance is needed to participate in a Committee meeting, please contact the Clerk of the Committee at (805) 642-1591 ext. 118. Notification of at least 48 hours prior to meeting time will assist staff in assuring that reasonable arrangements can be made to provide accessibility at the meeting.



VENTURA COUNTY TRANSPORTATION COMMISSION (VCTC) TRANSIT OPERATORS ADVISORY COMMITTEE (TRANSCOM) Wednesday, April 14, 2021 1:30 p.m.

MEETING HELD REMOTELY VIA-ZOOM Meeting Minutes

MEMBERS Matt Miller, Gold Coast Transit District (Chair)
PRESENT: Ben Gonzales, City of Simi Valley (Vice Chair)

Shaun Kroes, City of Moorpark

Philip Pulley, City of Ojai

Nancy Arrieta, City of Thousand Oaks Sergio Albarran, City of Ventura Treena Taylor, County of Ventura Martin Erickson, VCTC InterCity Bus

Magdalena Domingo, CSUCI (ex-officio)

MEMBERS City of Camarillo ABSENT: City of Fillmore

City of Santa Paula

VCAPCD (ex-officio)

VCTC STAFF Peter De Haan, Programming Director

PRESENT: Aaron Bonfilio, Program Manager / Transit Services

Claire Grasty, Program Manager / Regional Transit Planning

Jeni Eddington, Transit Planner Heather Miller, Program Manager

ITEM 1 CALL TO ORDER

Chair Miller called the regular TRANSCOM meeting to order at 1:32pm VIA-ZOOM.

ITEM 2 INTRODUCTIONS & ANNOUNCEMENT

Mr. Matt Miller, Gold Coast Transit District (GCTD), made two announcements: GCTD is planning on reinstating bus fares beginning May 3rd, (more information will be provided during Item 10 – COVID-19 Operations Update). Also, GCTD is implementing a new service, called "Late Night Rides", this service will begin either at the end of this month, and or early May, (service to be provided by their Paratransit Service Provider).

Mr. Ben Gonzales, Simi Valley, made a brief announcement, they are currently undergoing Triennial Review.

Mr. Martin Erickson, VCTC, announced, Ms. Stephanie Wiggins, who was the Chief Executive Officer (CEO) of Metrolink, will be the new CEO of Los Angeles (L.A.) METRO.

Mr. Shaun Kroes, City of Moorpark, will move forward with the "Moorpark Beach Bus" in the later part of June.

Mr. Peter De Haan, VCTC, announced, that in late February the Census Bureau proposed draft criteria for "redefining urbanized areas". This is a process which takes place every 10-vears. (derived from the Census results).

Mr. Aaron Bonfilio, VCTC, announced, VCTC recently submitted a "LOAN-NO Application" for the Valley Express Bus Service.

ITEM 3 PUBLIC COMMENT

None.

ITEM 4 AGENDA ADJUSTMENTS

None.

ITEM 5 APPROVAL OF MARCH MEETING MINUTES

ACTION

<u>Taylor moved Gonzales seconded, that the Committee approve the March 10, 2021 meeting minutes.</u> The motion passed with no objections.

ITEM 6 ADA CERTIFICATION SERVICES

Mr. Mike Culver, Mobility Management Program (MMP), provided an update on the Americans with Disabilities Act (ADA) Certification Services for the month of March, (please see attached report). He noted there was a significant drop last year in their Call Center for the months of October, November, December, and for the month of January. He also mentioned there was a slight increase in the month of February, and significantly in the month of March, (they continue to reach out to their clients as it relates to recertification). Lastly, he mentioned they have seen an increase in new applications being received.

ITEM 7 FISCAL YEAR (FY) 2021/22 TRANSPORTATION DEVELOPMENT ACT (TDA) UNMET TRANSIT NEEDS (UTN) FINDINGS

Ms. Jeni Eddington, VCTC, updated the Committee on the Unmet Transit Needs Findings for the Fiscal Year (FY) 2021/2022.

ITEM 8 TITLE VI DRAFT REPORT

Ms. Edington, VCTC, reviewed with the Committee the Draft VCTC 2021 Title VI Program Report.

ACTION

Kroes moved Albarran seconded, that the Committee approve the VCTC TITLE VI Draft Report. The motion passed with no objections.

ITEM 10 COVID-19 OPERATIONS UPDATE

Mr. Erickson and Mr. Bonfilio, VCTC, updated the Committee regarding VCTC's plan for resuming fare collection, including timeline of the new contactless fare collection program, effective July 1st. At that time, VCTC Intercity service is implementing a fare promotion, providing riders a half-year, half-fare promotion. Discussion was held regarding other operators future fare policy, and potentially participating in a similar promotion.

ITEM 11 ADJOURNMENT

Chair Miller adjourned the meeting at 2:22 pm.



May 12, 2021

MEMO TO: TRANSIT OPERATORS ADVISORY COMMITTEE (TRANSCOM)

FROM: AARON BONFILIO, PROGRAM MANAGER

SUBJECT: ADA CERTIFICATION SERVICES PROGRAM UPDATE

RECOMMENDATION:

Receive and file the monthly ADA Certification services report(s) and program update.

DISCUSSION:

Mobility Management Partners (MMP) is VCTC's service provider for ADA Paratransit Eligibility Certification services.

Attached is the ADA Paratransit Certification Services Report from MMP for review at the TRANSCOM meeting. This report covers the period of *April 2021*.



[This page intentionally left blank.]

			Α	pr-21				
		April	March	Feb.	Jan.	Dec.	Nov.	
	Inbound ADA Calls	252	244	165	152	142	120	As of March 17th MMP closed their Camarillo office and began
	Outbound ADA calls	423	380	311	205	182	191	working remotely due to COVID-19 restrictions.
Call Center	Average hold time (in seconds)	1.5	1.4	1.2	1	1	1.1	
	Outbound Area Transmittals	11	10	7	2	2	0	Riders requesting service outside of Ventura County
	Inbound Area Transmittals	5	7	7	6	3	2	Riders requesting service into Ventura County
	Recertification	147	118	105	65	57	63	Total applications received: 188
Received	New Applications	41	51	33	26	24	22	Online Applications Received: 2 (2%)
	Camarillo Area	18	11	7	7	10	8	
	Gold Coast Area	74	73	49	36	42	31	Applications by Language
Applications	Valley Express Area	3	5	8	5	1	1	3%
Received	Moorpark Area	4	6	10	3	3	2	■ ENGLISH
by Service Area	Simi Valley Area	49	41	34	20	13	27	97% SPANISH
	Thousand Oaks	38	29	29	20	10	16	- SI / HUISTI
	Out of County	2	4	1	0	2	0	
	Complete, with Functional Evaluation	0	0	0	0	0	0	End of the Later of Bulletin to the End
	Complete, Interview w/o Functional Evaluation	0	0	0	0	0	0	Evaluations by Age and Determination Type
Completed	Complete, Special Circumstance (no Interview)	23	42	22	25	23	15	40 —
	Complete, Over 85+	11	8	5	2	0	3	30
Evaluation Type	Complete, Phone Interview	4	2	1	2	3	8	30
	Complete, Short-term Certification (60 days)	0	0	0	0	0	0	20
	Complete, Recertifications	147	117	107	62	56	60	10
	Completed Determinations	185	169	135	91	82	86	
Delays in	Due to incomplete application by client	0	5	2	1	0	0	0 45.24 25.24 25.44 45.54 55.54 55.74 25.04 25.04
Processing	Pending Professional Evaluation (PE)	5	2	3	0	3	5	15-24 25-34 35-44 45-54 55-64 65-74 75-84 85-94 95+
(Cumulative)	Applications that failed to meet 21 day rule	0	0	0	0	0	0	■ Conditional ■ Not Eligible ■ Temporary ■ Unconditional
,	Applicants awaiting in-person interviews	0	0	0 VCTC	O SIMI	0	0	
	Assessment Catagories With Physical Assessment	Total	CAM 0	VCTC	0	T.O.	MPK	In-person Interviews by Eligibility
	With Cognitive Assessment	0	0		0		0	and Assessment Type
	Interview only (at assessment sites)	0	0	0	0	0	0	and Assessment Type
Assessments	No Shows	0	0	0	0	0	0	1 —
	Total in-person interviews scheduled	0	0	0	0	0	0	0.8
	Total Number of appointment days	0	0	0	0	0	0	0.6
	Determinations by Eligiblity		-	Total	%		_	0.4
Unconditional (inclu	iding S.C., Over 85+ , Phone interviews, short-term)			163	88%			0.2
	Conditional			4	2%			0
	Temporary			18	10%			Unconditional Conditional Temporary
	Denials			0	0%			
	Short Term			0	0%			■ Physical ■ Cognitive ■ Interview only

			Α	pr-21				
		April	March	Feb.	Jan.	Dec.	Nov.	
	Inbound ADA Calls	252	244	165	152	142	120	As of March 17th MMP closed their Camarillo office and began
	Outbound ADA calls	423	380	311	205	182	191	working remotely due to COVID-19 restrictions.
Call Center	Average hold time (in seconds)	1.5	1.4	1.2	1	1	1.1	
	Outbound Area Transmittals	11	10	7	2	2	0	Riders requesting service outside of Ventura County
	Inbound Area Transmittals	5	7	7	6	3	2	Riders requesting service into Ventura County
	Recertification	147	118	105	65	57	63	Total applications received: 188
Received	New Applications	41	51	33	26	24	22	Online Applications Received: 2 (2%)
	Camarillo Area	18	11	7	7	10	8	
	Gold Coast Area	74	73	49	36	42	31	Applications by Language
Applications	Valley Express Area	3	5	8	5	1	1	3%
Received	Moorpark Area	4	6	10	3	3	2	■ ENGLISH
by Service Area	Simi Valley Area	49	41	34	20	13	27	97% SPANISH
	Thousand Oaks	38	29	29	20	10	16	- SI / HUISTI
	Out of County	2	4	1	0	2	0	
	Complete, with Functional Evaluation	0	0	0	0	0	0	End of the Later of Bulletin to the End
	Complete, Interview w/o Functional Evaluation	0	0	0	0	0	0	Evaluations by Age and Determination Type
Completed	Complete, Special Circumstance (no Interview)	23	42	22	25	23	15	40 —
	Complete, Over 85+	11	8	5	2	0	3	30
Evaluation Type	Complete, Phone Interview	4	2	1	2	3	8	30
	Complete, Short-term Certification (60 days)	0	0	0	0	0	0	20
	Complete, Recertifications	147	117	107	62	56	60	10
	Completed Determinations	185	169	135	91	82	86	
Delays in	Due to incomplete application by client	0	5	2	1	0	0	0 45.24 25.24 25.44 45.54 55.54 55.74 25.04 25.04
Processing	Pending Professional Evaluation (PE)	5	2	3	0	3	5	15-24 25-34 35-44 45-54 55-64 65-74 75-84 85-94 95+
(Cumulative)	Applications that failed to meet 21 day rule	0	0	0	0	0	0	■ Conditional ■ Not Eligible ■ Temporary ■ Unconditional
,	Applicants awaiting in-person interviews	0	0	0 VCTC	O SIMI	0	0	
	Assessment Catagories With Physical Assessment	Total	CAM 0	VCTC	0	T.O.	MPK	In-person Interviews by Eligibility
	With Cognitive Assessment	0	0		0		0	and Assessment Type
	Interview only (at assessment sites)	0	0	0	0	0	0	and Assessment Type
Assessments	No Shows	0	0	0	0	0	0	1 —
	Total in-person interviews scheduled	0	0	0	0	0	0	0.8
	Total Number of appointment days	0	0	0	0	0	0	0.6
	Determinations by Eligiblity		-	Total	%		_	0.4
Unconditional (inclu	iding S.C., Over 85+ , Phone interviews, short-term)			163	88%			0.2
	Conditional			4	2%			0
	Temporary			18	10%			Unconditional Conditional Temporary
	Denials			0	0%			
	Short Term			0	0%			■ Physical ■ Cognitive ■ Interview only

Apr-21				
Applications Received - GCT Area Cities	Apr.	Mar.	Feb.	Jan.
Casitas Springs	0	0	0	0
Meiners Oaks	0	0	0	0
Miramonte	0	0	0	0
Ojai	4	3	1	0
Oak View	3	0	0	0
Oxnard	37	44	26	23
Saticoy	0	0	0	0
Port Hueneme	2	7	3	1
Ventura	28	19	19	12
Applications Received-Valley Express Area Cities				
Fillmore	1	3	1	2
Piru	0	0	0	0
Santa Paula	2	2	7	3

Apr-21				
Applications Received - GCT Area Cities	Apr.	Mar.	Feb.	Jan.
Casitas Springs	0	0	0	0
Meiners Oaks	0	0	0	0
Miramonte	0	0	0	0
Ojai	4	3	1	0
Oak View	3	0	0	0
Oxnard	37	44	26	23
Saticoy	0	0	0	0
Port Hueneme	2	7	3	1
Ventura	28	19	19	12
Applications Received-Valley Express Area Cities				
Fillmore	1	3	1	2
Piru	0	0	0	0
Santa Paula	2	2	7	3

Attachment C

Monthly Queue Call Report (April)

	Call Count	Queue Size	Answered	Abandoned	Redirected	Disconnected	С	all Co	unt	Н	old Ti	me	To VoiceMail	Service Level
	Total In	Max	Total	Total	Total	Total	In	Out	Out Total		Max	Avg		Service Level
Grand Total	247	2	162	13	72	0	247	0	247	0	0	0.00	72	58.70%
Monday	43	2	33	0	10	0	43	0	43	0	0	0.00	10	72.09%
Tuesday	39	1	25	3	11	0	39	0	39	0	0	0.00	11	58.97%
Wednesday	38	1	24	3	11	0	38	0	38	0	0	0.00	11	52.63%
Thursday	49	2	40	2	7	0	49	0	49	0	0	0.00	7	73.47%
Friday	76	2	40	5	31	0	76	0	76	0	0	0.00	31	46.05%
Saturday	2	0	0	0	2	0	2	0	2	0	0	0.00	2	0.00%



[This page intentionally left blank.]



May 12, 2021

MEMO TO: TRANSIT OPERATORS ADVISORY COMMITTEE (TRANSCOM)

FROM: PETER DE HAAN, PROGRAMMING DIRECTOR

SUBJECT: DISTRIBUTION OF FEDERAL COVID RELIEF FUNDS

RECOMMENDATION:

Approve distribution of federal relief funds as shown in the Attachment A table.

BACKGROUND:

The federal government has approved three COVID relief bills, each of which provides emergency transit funding distributed according to a different method. The following are the apportionments for Ventura County from the three bills:

Coronavirus Aid, Relief, and Economic Security (CARES Act) –

Urban Area Funds = \$67,166,310 Rural Area Funds = \$1,303,379

Coronavirus Response and Relief Supplemental Appropriations (CRRSA) Act –

Urban Area Funds = \$0 Rural Area Funds = \$1,172,336

American Relief Plan (ARP) Act –

Urban Area Funds = \$15,023,627 Rural Area Funds = \$500,000 (estimate)

The initial CARES Act used the standard FTA formulas for distributing transit funds. For urban funds, the standard formula for Section 5307 Urbanized Area funds is based primarily on population and service miles for large urban areas, and a much more heavily-weighted population factor only for small urban areas which in Ventura County are defined as Simi Valley and Camarillo. This formula also includes track miles which result in a large amount of additional funds due to Metrolink. VCTC's policy has been to distribute funds to transit operators based on what they generate in the formula, minus an amount taken proportionally off-the-top for VCTC countywide expenses. The Commission approved using the same policy for CARES funds, with

the exception that due to Metrolink's large number, an additional \$1 million was taken off Metrolink's share and applied towards future VCTC countywide costs.

In the subsequent relief acts, the emphasis was placed on distributing funds proportionally based on annual transit operating cost relative to funds received from CARES. Since FTA calculates apportionments by urbanized area rather than by individual operator, the large amount of funds generated by Metrolink under the CARES Act caused Ventura County to be excluded from the CRSSA urbanized funds, and reduced the amount received from ARP.

With regard to rural areas, all three acts distributed funds based on population, in a similar manner to the regular rural funds (Section 5311). By long-standing agreement, the rural funds going to Ventura County are used by Ojai Trolley, and as a result Ojai has received the rural CARES funds and has submitted its application to receive the CRSSA funds.

ANALYSIS:

VCTC has developed a recommended operator distribution in keeping with the intent of the ARP Act to equalize the total funding of all three relief acts relative to annual (FY 2017/18) operating costs. It is important to understand that the CARES funds for each area came out very different relative to individual transit operator funding needs. In the rush to provide funds in the onset of the crisis, the existing FTA formula was used, but in retrospect it appears that this method did not equitably address the need. The ARP Act formula calculates the amount required to achieve the general goal of each urbanized area receiving ARP funds such that the total of CARES, CRRSA, and ARP is 132% of operating expenses. However, given that some of the county's transit operators already received significantly more than 132% of their annual cost from CARES, the total countywide funds available in ARP are only enough to ensure every operator receives a total of at least 99.44% of annual operating costs from the three acts. The recommended distribution therefore allows each operator that did not already receive more than 99.44% of annual operating costs, to receive an amount from ARP such that the total relief funding is equal to 99.44% of costs.

To facilitate this equitable sharing of funds countywide without reference to the individual urbanize area apportionments, per FTA's policies funds apportioned to each urbanized area can be allocated to any transit operator providing at least some service to that urbanized area. Attachment B shows how the funds from each area will be split among operators serving that area, such that the proposals totals are met for each transit operator to receive no less than 99.44% of annual operating expenses.

With regard to the rural CRSSA funds, although in keeping with the current policy Ojai has already submitted, and VCTC has already approved, the claim for the \$1,172,336 Ventura County apportionment, staff has included this amount in the countywide distribution used to provide the "floor" of 99.44% of operating costs for each operator. Since it is not feasible to cancel this claim without potentially losing these funds, it is recommended that the \$1,172,336 CRRSA rural apportionment included in the overall distribution come instead from future-year Section 5311 Rural Area apportionments. The CARES funds already received put Ojai Trolley well over the 99.44% of operating expenses being received by most other operators. Furthermore, due to the large amount of funding being received through both CARES and CRRSA, it is likely that Ojai will have sufficient funds for several years' of operations even with no regular Section 5311. Attachment B includes information on this proposed revision to Ojai's Section 5311 funding and how it will be redistributed. The rural ARP funds, estimated to be \$500,000, are also included in the distribution rather than provided to Ojai.

VCTC is not proposing to take any further relief funds off-the-top as it did for with CARES. Last year the purpose of taking CARES off-the-top was to avoid VCTC requiring a local match for countywide planning, thus reducing the need to take Local Transportation Funds (LTF) off the top at a time when LTF was projected to drop significantly. Since the LTF amount now appears to be

holding steady, VCTC is proposing for FY 21/22 to return to using 5307 for countywide planning, using the LTF for the 20% match as was done before.

Although the COVID relief funds are exempt from the requirement to be programmed in the TIP, they must still be programmed in the POP. VCTC therefore requests that the transit operators provide to VCTC by May 20th the projects that are proposed for using their share of ARP funds.

ARP contains a provision that funds can only be used for operations unless there are no furloughs of transit staff or transit contractor employees, or all furloughed staff are in the process of returning to work. FTA has confirmed that since the operations contractors for VCTC's subrecipients both have furloughed employees who provided Ventura County transit operations, VCTC and its subrecipients are only allowed to use ARP funds for operations. FTA has interpreted that maintenance expenses qualify as operations expenses for purposes of compliance with this ARP requirement.

As with CARES funds, no local match is required for ARP funds. Expenses incurred before ARP passed can be eligible, going back to January 20, 2020. FTA has again stipulated for ARP that any expense incurred after January 20, 2020, can be considered to be responding to COVID, thus meeting the ARP requirement that funds be used to respond to COVID. Although CARES contains no deadline for obligating and expending funds, all ARP funds must be obligated by September 30, 2024, and disbursed by September 30, 2029.

CRSSA and ARP also provided Ventura County areas with apportionments totaling \$170,415 for Senior/Disabled transportation services. Since VCTC recently completed a call for such projects, and was able to fund all applications, staff anticipates using this relatively small amount of additional funds toward the approved projects, which will result in a larger balance of Section 5310 Senior/Disabled program funds available in the next call for projects.



[This page intentionally left blank.]

	CRSSA/ARP Urban/Rural Fund	Distribution	
	Based on equalized operating co	st proportion	
	CARES Apportionment	CRSSA/ARP to get 99.44% of annual operating cost	Total
Metrolink	32,053,845		32,053,845
Gold Coast Transit	13,883,352	9,690,059	23,573,411
VCTC Intercity	3,630,510	4,407,607	8,038,117
Valley Express	1,882,370		1,882,370
Thousand Oaks	3,509,925	1,840,804	5,350,729
Ojai	1,303,379		1,303,379
Moorpark	1,002,706	525,878	1,528,584
Camarillo	3,765,723		3,765,723
Simi Valley	7,437,879	231,615	7,669,494
TOTAL	68,469,689	16,695,963	85,165,652

The analysis combines the 5307 Urban with the 5311 Rural funds generally received by Ojai. As stipulated by the ARP, the distribution is based on FY 2017/18 operating cost.

Rural ARP apportionment is not yet published and is therefore only an estimate. Since the rural CRSSAA is currently being obligated by Ojai,

Ojai has already submitted the rural CRSSA of \$1,172,336 for obligation. Because this additional funding places Ojai even further over the 132% of operating expenses, VCTC will use \$1,172,336 of future 5311 apportionments that would otherwise go to Ojai, this keeping the total countywide distribution at 99.44% of annual operating costs for agencies that did not get 99.44%.

Due to Metrolink, Camarillo and Ojai receiving over 132% of annual cost from CARES, the remaining CRSSA/ARP apportionments are sufficient to provide the remaining operators with 99.44% of annual cost when combined with CARES.

Although Valley Express received less than 132% of annual cost from CARES, it did receive over 99.44%, so it gets no more money.

Ventura County only received 5311 funds from CRSSA. The CRSSA/ARP 5311 funds are included in the redistribution to reach 99.44%. The ARPA 5311 amount is an estimate, since the actual apportionment has not been published by Caltrans.

Receipt of 5311 by an urban operator will result in a temporary 300K - \$350K reduction in 5307.

Thousand Oaks/Moorpark apportionment is shared and can be redistributed between two cities by mutal agreement.

		(CRSSA/ARP/5311 Urba	an/Rural Fund Distrib	ution			
			Based on equalized of	perating cost propor	tion			
			Showing Apport	ionment Breakdown				
	ARP Oxnard/Ventura UZA	ARP Thousand Oaks/ Moorpark UZA	ARP Simi Valley UZA	ARP Camarillo UZA	CRSSA Rural	ARP Rural ¹	Future 5311 Rural	TOTAL
Gold Coast Transit ²	9,648,997			41,062				9,690,059
VCTC Intercity ³ Thousand Oaks		265,180 1,840,804	1,993,900	476,191		500,000	1,172,336	4,407,607 1,840,804
Ojai		525,878			1,172,336		(1,172,336)	=
Moorpark Simi Valley		525,878	231,615					525,878 231,615
TOTAL	9,648,997	2,631,862	2,225,515	517,253	1,172,336	500,000	-	16,695,963

¹Estimate - Official ARP Rural apportionment not released.

 $^{^2\}mbox{GCT}$ can use Camarillo funds since its paratransit serves that area.

³VCTC Intercity can use any area funds since it serves all areas.



May 12, 2021

MEMO TO: TRANSIT OPERATORS ADVISORY COMMITTEE (TRANSCOM)

FROM: PETER DE HAAN, PROGRAMMING DIRECTOR

SUBJECT: FY 2021/22 ESTIMATED PROGRAM OF PROJECTS FUNDS

RECOMMENDATION:

Receive and file.

BACKGROUND:

VCTC is now starting the process for developing the Program of Projects (POP) for transit projects to be programmed in in Ventura County with the upcoming FY 2021/22 federal apportionments. As the Committee is aware, each year all projects funded by the Federal Transit Administration (FTA) must be included in a publicly-reviewed POP, which is adopted by VCTC. In addition, projects must be included in the SCAG Regional Transportation Improvement Program (TIP), and VCTC uses the adopted POP as a basis for preparing a TIP Amendment for SCAG to include the upcoming transit projects in the TIP. On April 24th, VCTC emailed to the transit operators the POP funding targets. Each transit operator is therefore requested to provide to VCTC staff by May 20th a program of projects that is proposed for funding using its share of the available funds.

As in past years, Section 5307 funds are taken "off the top" to cover VCTC countywide planning costs. Attachment A tabulates these "off the top" amounts and compares them to the two prior years. As TRANSCOM will recall, in FY 2020/21 VCTC minimized this amount because of the funds that VCTC utilized from the CARES Act for these purposes. The FY 2021/22 "off the top" amount has therefore increased from the FY 2020/21 level, but is still somewhat less than what could be considered "normal," due to CARES carryover. Since ARP provides significantly less funds than CARES, staff is not planning to take an amount of ARP "off the top" for countywide planning. The "off the top" planning funds are distributed by population, except that in recognition of the fact that the federal funds are apportioned differently than population shares creating hardship for Gold Coast, the Gold Coast "off the top" amount is based solely on Gold Coast's FTA funding share relative to the other local bus operators.

The revenue table – Attachment B pg. 1, calculates the amount of funds estimated to be apportioned by FTA to each urbanized area, along with the source of the various funds generated by FTA's formula. Since the federal Fixing America's Surface Transportation (FAST) Act does not extend beyond FY 2020/21, VCTC is conservatively basing the FY 2021/22 estimates on the actual FY 2020/21 apportionments.

The expense table – Attachment A pg.2, shows how the various estimated expenses are funded from the different areas. The amount available for each agency to program is the total of the "Local Bus/Capital" and "5339 Funds" columns. In addition, Gold Coast, Simi Valley, Thousand Oaks, Camarillo, and Moorpark may program up to the amount shown in the "ADA" column for their ADA service, and may also use the funds in the "ADA" column for other eligible transit uses if they chose not to use all of the funds for ADA. For Thousand Oaks and Moorpark, the two cities will need to agree on how much of the \$1,494,488 available from 5307 and 5339 on the "Thousand Oaks/Moorpark" line (including the ADA funds) will be used by each of their respective cities.

Since the previous federal transportation authorization, MAP-21, consolidated the Jobs Access Reverse Commute (JARC) program with Section 5307, the portion of 5307 funds generated based on low-income population is separated out. Under VCTC policy, those funds arel distributed based on last year's call for projects.

VCTC will use the programs submitted by the transit operators to prepare the countywide draft Program of Projects, to be reviewed by TRANSCOM at its June 9, 2021 meeting. TRANSCOM will review the final version of the POP on July 14th, with approval by VCTC at its September 10, 2021 meeting.

FY 2019/20 POP Countywide Planning

(FTA Section 5307 funds only)

Section 5307 Distribution for VCTC Planning

		19/20 PO	Ρ			20/21 PO	Р		21/22 POP						
	Addition 19/20	al Pre Prog 20/21	2	Total 0/21 Grant	Additional 20/21	Pre Prog 21/22	2	Total 1/22 Grant	Addition 21/2		Pre Prog 22/23	Total 22/23 Gran			
VCTC Bus Planning		475,000		475,000		30,00)	30,000			425,000	425,00			
Senior/Disabled Planning/Evaluation		235,000		235,000				-				-			
Fare Collection / APC Data Managen	nent	295,000		295,000		340,00)	340,000			25,000	25,00			
Fare/APC/AVL Equip Combined		280,000		280,000				-			430,000	430,00			
Transit Planning & Programming		745,000		745,000		50,00)	50,000			885,000	885,00			
Transit Information Center		235,000		235,000				-			105,000	105,00			
Transit Outreach*				-				-				-			
Funded from CARES Carryover						(200,00	0)	(200,000)			(200,000)	(200,00			
Total VCTC planning	\$ -	\$ 2,265,000	\$	2,265,000	\$ -	\$ 220,00) \$	220,000	\$	-	\$1,670,000	\$ 1,670,00			
	I														
*Transit Outreach funded from CMAC															

ATTACHMENT B - Page 1

2021/22 ESTIMATED APPORTIONMENTS

		Metrolink 337 Funds ¹		Metrolink 307 Funds ¹	VCTC/VE 5307 Funds ²		Bus		l	Population		Bus/Pop 339 Funds	- 1	bs Access Reverse Commute		TOTAL
Oxnard/Ventura UZA Gold Coast ³ SCRRA/VCTC Intercity ³ Simi Valley Camarillo	\$ \$ \$ \$ \$	5,086,919 - 1,563,293 1,959,052 1,564,574	\$ \$ \$ \$ \$	2,488,773 - 753,104 964,897 770,772	\$	1,648,086 - 1,287,094 82,365 95,438		2,166,146 2,166,146 - -	\$ \$ \$ \$	3,224,993 3,224,993	\$ \$ \$ \$	831,081 636,034 150,988 10,053 11,648	\$	235,321	\$ \$ \$ \$	15,681,319 6,027,174 3,754,478 3,016,368 2,442,432
Thousand Oaks/Moorpark Thousand Oaks/Moorpark UZ Thousand Oaks/Moorpark	\$	3,509,270 3,509,270	\$ \$ \$	741,462 741,462	\$	183,189	\$ \$ \$	808,323 760,033	\$ \$ \$	1,355,663 1,016,721	\$ \$ \$	22,358 251,390 156,597	\$	58,492	\$ \$ \$	205,547 6,724,600 6,184,082
County Unincorporated Simi Valley UZA	\$ \$	-	\$	-	\$ \$	-	\$ \$	48,290	\$ \$	338,943 2,808,851	\$ \$	94,793 335,989	\$	-	\$ \$	482,026 3,144,840
Camarillo UZA ³ TOTAL FTA Funds	\$ \$	8,596,189	\$ <u>\$</u>	3,230,235	\$ <u>\$</u>	- 1,648,086	\$ \$	- 2,974,469	\$ <u>\$</u>	2,151,608 9,541,115	\$ <u>\$</u>	169,287 1,587,747	\$ \$	- 293,814	\$ \$	2,320,895 27,871,655

¹Metrolink FTA revenue for Simi Valley and Camarillo Areas is reported to Oxnard/Ventura Area.

²VCTC Intercity FTA Revenue for TO/Moorpark, Camarillo, and Simi Valley Areas is reported to Oxnard/Ventura Area.

³ Includes carryover

ATTACHMENT B - Page 2

2021/22 POP EXPENSES

	Metrolink 337 Funds ⁶	Metrolink 07 Funds ⁶	VCTC/VE 5307 Funds	Countywide Planning ⁷	ADA ⁸	В	Local sus/Capital ⁹		Bus/Pop 339 Funds	bs Access Reverse Commute		TOTAL
Oxnard/Ventura UZA ⁵	\$ 5,086,919	\$ 1,848,773	\$ 2,288,086	\$ 776,281	\$ 956,332	\$	3,658,526	\$	831,081	\$ 235,321	\$	15,681,319
Gold Coast	\$ -	\$ -	\$ -	\$ 776,281	\$ 956,332	\$	3,658,526	\$	636,034		\$	6,027,174
SCRRA/VISTA	\$ 1,563,293	\$ 113,104	\$ 1,927,094	\$ _	\$ _	\$	-	\$	150,988		\$	3,754,478
Simi Valley	\$ 1,959,052	\$ 964,897	\$ 82,365	\$ _	\$ -	\$	_	\$	10,053		\$	3,016,368
Camarillo	\$ 1,564,574	\$ 770,772	\$ 95,438	\$ -	\$ -	\$	-	\$	11,648		\$	2,442,432
Thousand Oaks/Moorpark	\$ -	\$ =.	\$ 183,189	\$ -	\$ -	\$	-	\$	22,358		\$	205,547
JARC										\$ 235,321	\$	235,321
Thousand Oaks/Moorpark UZA	\$ 3,509,270	\$ 741,462	\$ 387,233	\$ 438,863	\$ 296,394	\$	1,041,497	\$	251,390	\$ 58,492	\$	6,724,600
Thousand Oaks/Moorpark	\$ 3,509,270	\$ 741,462	\$ -	\$ 438,863	\$ 296,394	\$	1,041,497	\$	156,597		\$	6,184,082
County Unincorporated ¹⁰ JARC	\$ -	\$ -	\$ 387,233	\$ -	\$ -	\$	-	\$	94,793	\$ 58,492	\$ \$	482,026 58,492
Simi Valley UZA	\$ -	\$ -	\$ -	\$ 272,551	\$ 280,885	\$	2,255,415	\$	335,989	\$ -	\$	3,144,840
Camarillo UZA	\$ -	\$ -	\$ -	\$ 182,305	\$ 142,845	\$	1,826,458	\$	169,287	\$ -	\$	2,320,895
TOTAL FTA Costs	\$ 8,596,189	\$ 2,590,235	\$ 2,675,319	\$ 1,670,000	\$ 1,676,456	\$	8,781,896	<u>\$</u>	1,587,747	\$ 293,814	\$	27,871,655
Available Revenue											\$	27,871,655
Surplus (Shortfall)											<u>\$</u>	

⁶Section 5337 and 5307 monies are combined to fund Metrolink services. Some Metrolink -generated 5307 funds swapped with VCTC. STA funds to reduce Metrolink swap requirement.

⁷Countywide Planning cost is distributed to Gold Coast based on apportionment share, then to remaining areas based on population.

⁸10% of 5307 apportionment.

⁹MAP-21 allows use of up to \$7,439,833 of Oxnard/Ventura funds and \$2,209,300 of Thousand Oaks/Moorpark funds for bus operating assistance.

¹⁰County Unincorporated includes revenue for portion of TO/Moorpark area outside of the two cities. These funds are used for VCTC Intercity.



[This page intentionally left blank.]



May 12, 2021

MEMO TO: TRANSIT OPERATORS ADVISORY COMMITTEE (TRANSCOM)

FROM: HEATHER MILLER, PROGRAM MANAGER

SUBJECT: FY 2020/21 LOW CARBON TRANSIT OPERATIONS PROGRAM (LCTOP)

ALLOCATION

RECOMMENDATION:

 Ratify the revised Ventura County Transportation Commission (VCTC) FY 2020/21 Low Carbon Transit Operations Program (LCTOP) Allocation Request of \$886,110 to fund the College Ride Program.

BACKGROUND:

This item revises the original recommendation provided at the last TRANSCOM meeting held on March 10, 2021. The original recommendation approved the FY20/21 LCTOP funding allocation request of \$420,000 for the College Ride Program and \$466,110 for the Metrolink Saturday Service.

DISCUSSION:

At the March 2021 TRANSCOM meeting, VCTC staff recommended approval of FY20/21 LCTOP funding of \$420,000 for the College Ride program and \$466,110 for the Metrolink Saturday Service for a total funding request of \$886,110. However, through the Caltrans review process, the Saturday Metrolink project was deemed ineligible for FY20/21 LCTOP funding because the project's start and end dates coincided with last year's FY19/20 Metrolink Saturday Service project's start and end dates. While the start of the new Saturday train service was expected in April 2021, the COVID-19 pandemic and subsequent drop in ridership forced a postponement of the service's launch date. Consequently, the FY19/20 Metrolink Saturday Service project end date was extended by six months. This end date precludes the start of additional funding for a FY20/21 project since projects must start within six months of funding award (anticipated in June 2021) but cannot overlap with existing projects (FY19/20). Sufficient funds, however, are available from the FY19/20 award to finance ongoing operations (since the launch date was delayed to this year) until additional funding can be requested in FY21/22. LCTOP funding requests for an ongoing project are permitted over a five-year period.

VCTC staff therefore recommends adding \$466,110 to the College Ride program funding request for a revised total funding request of \$886,110 for this program. The "College Ride" program provides free transit fares for Ventura County college students and has proved to be a very popular program since its launch in 2018. Additionally, augmenting an existing project is a means to expeditiously secure the LCTOP funding and avoid any possibility of losing funds since FY20/21 awards are expected to be announced by the SCO in June 2021 and project applications were submitted in April. The total requested amount also includes local LCTOP shares from the Cities of Camarillo, Moorpark and Thousand Oaks as contributing sponsors.

The additional amount of funding allows the College Ride program to be extended through December 2023. Extending the project's end date to December 2023 would preclude requesting additional funding next year. Additionally, next year would be the fifth and final year to request funding for College Ride since the program was initiated in 2018. Therefore, this year's funding request will be the last for the program. As such, agencies that have been contributing sponsors to the College Ride program over the years will no longer have this option available to them next year and should begin considering other projects to fund with their local allotments looking ahead.

The College Ride program has significant funds available for the foreseeable future, albeit at what time countywide fare collection resumes and to what extent the ridership recovers will ultimately determine the length of the program. Of additional note, this year's College Ride program revised the reimbursement rate by replacing the previous reimbursement rate of \$1.45 per trip for all participants to individual rates reflecting each operator's average fare.

It is important to point out the potential to adjust the use of LCTOP funds in the future if excess funds remain at the conclusion of these projects. When a project reaches its respective end date, if it has a remaining balance, LCTOP guidelines allow for a corrective action plan (CAP) to move funds to other eligible projects. TRANSCOM has discussed possible projects for future LCTOP funding including offering additional types of fare discount programs; expanding the Metrolink Saturday Service; and constructing Zero Emission Bus (ZEB) fueling facilities to facilitate and support countywide efforts in meeting the 100% ZEB by 2040 goal set by the State of California.

The approved TRANSCOM recommendation would move forward to the Ventura County Transportation Commission for approval on June 4, 2021.



May 12, 2021

MEMO TO: TRANSIT OPERATORS ADVISORY COMMITTEE (TRANSCOM)

FROM: PETER DE HAAN, PROGRAMMING DIRECTOR

AMANDA FAGAN, PLANNING DIRECTOR

SUBJECT: COMMENT ON CENSUS BUREAU REGARDING URBANIZED AREA

DEFINITION METHODOLOGY

RECOMMENDATION:

 Approve the attached comment to the United States Census Bureau regarding the proposed policy for redefining urbanized areas based on 2020 Census data.

BACKGROUND:

The Fixing America's Surface Transportation (FAST) Act, along with previous federal transportation authorization laws, provided for federal transit funds to be apportioned to urbanized areas defined by the Census Bureau after each decennial census. Every ten years, the Census Bureau first publishes a notice proposing the methodology it will use to redefine the urbanized areas and requesting comment. After the comment period ends, the Bureau, without further public review, decides the final methodology and then applies that methodology to the current data to define the urbanized areas.

How the urbanized areas are defined can significantly affect the distribution of transit funds. Prior to 2000, Ventura County had two urbanized area, one of which encompassed Oxnard, Ventura, Thousand Oaks, Port Hueneme and Camarillo, and the other including Simi Valley and Moorpark. After the 2000 Census, the Bureau designated four urbanized areas: Oxnard/Ventura/Port Hueneme/Ojai, Thousand Oaks/Moorpark, Simi Valley, and Camarillo. The 2010 urbanized area definition process made slight boundary adjustments but did not substantially change the 2000 configuration.

The areas not included in urbanized areas are defined as rural, and the Ventura County rural area receives a single apportionment from the Federal Transit Administration (FTA) Section 5311 Rural funds, which under VCTC's longstanding policy has gone to the City of Ojai for the Ojai Trolley. Although Ojai has since the 2000 Census been included with Oxnard and Ventura in an urbanized area, VCTC has not changed the policy of providing all the county's Section 5311 funds to Ojai.

The Census Bureau takes no consideration of how the Urbanized Area definition criteria affect funding for transit or any other programs. Therefore, comments to the Bureau regarding these criteria must only address demographic considerations, and not include any arguments based on funding impacts.

The 2010 Census urbanized area criteria notice is posted at https://www.federalregister.gov/documents/2021/02/19/2021-03412/urban-areas-for-the-2020-census-proposed-criteria. The notice proposes various changes including use of housing rather than population density, and changes to how an urbanized area can "hop" or "jump" over certain vacant areas.

Perhaps the most significant change is the proposal to use the Census Bureau's Longitudinal Employer-Household Dynamics (LEHD) Program Origin-Destination Employment Statistics (LODES) data to consider whether adjacent urbanized areas should be joined or split based on the percentage of residents or workers who commute from the neighboring areas. This change introduces uncertainty into the continuing separation of the Ventura County areas.

ANALYSIS:

Since the urbanized area redefinition in 2000, a significant issue for Ventura County has been the inclusion of Ojai in the urban, rather than the rural area. This designation seems counterintuitive, since Santa Paula and Fillmore remain rural, and the only reason for Ojai to be defined as urban is that there exists a long and somewhat continuous "strip" of development along Highway 33, while no such strips exist between Ventura, Santa Paula, and Fillmore. Therefore, VCTC's proposed comment will raise this issue.

The proposed comment also addresses the Census Bureau proposal to use worker flow data (i.e., commute patterns) from the Longitudinal Employer-Household Dynamics (LEHD) Program to identify whether commuting patterns reflect a functionally integrated region or distinct urban areas. The Bureau proposes to analyze aggregate commuter flows into and out of each urban area, and urban areas would be merged if the commute data reflects that the following conditions are met: "50 percent or more of the workers in the smaller urban area are working in the larger urban area and 50 percent or more of the jobs in the smaller urban area are filled by workers residing in the larger urban area."

Staff analyzed the proposed use of the LODES data to determine urban areas. While Staff believes that it is reasonable to consider employment commute patterns for determining urban area boundaries, Staff is concerned that the LODES data may contain a bias toward central cities due to the location of offices where unemployment insurance and other administrative records are maintained that LODES relies on for this data. LEHD was intended as an economic survey and relies primarily on Unemployment Insurance records, which can be based out of an office location that is not necessarily the same as the job location. According to the Census Bureau,

Under the LEHD Partnership, states agree to share Unemployment Insurance earnings data and the Quarterly Census of Employment and Wages (QCEW) data with the Census Bureau. The LEHD program combines these administrative data, additional administrative data and data from censuses and surveys. From these data, the program creates statistics on employment, earnings, and job flows at detailed levels of geography and industry and for different demographic groups. In addition, the LEHD program uses these data to create partially synthetic data on workers' residential patterns.1

As a result, using the LODES data to make such determinations may overestimate connectivity with a central city when compared to other origin-destination data sources, such as the Census Transportation Planning Products (CTPP) and regional and local traffic models. For example, VCTC staff selected three cities (Simi Valley, Thousand Oaks, and Camarillo) for a comparison of data from the Ventura County Traffic Model (VCTM), CTPP, and LODES. As shown in Exhibit A of the comment letter, in all three cases, the LODES data reflects comparably much lower internal-internal commute trips and higher Non-Ventura County trips.

Further analysis of the proposed criteria compared to the LODES data reflects that Ventura County's border cities (Thousand Oaks/Moorpark and Simi Valley urbanized areas) may meet the first test of the criteria (50 percent or more of the workers commute to Los Angeles urban area for work) but is not likely to meet the second test of the criteria (50 percent or more of the jobs in

either city are filled by Los Angeles workers). LODES data shows that Los Angeles County is the greatest commute destination for both Simi Valley and Thousand Oaks UAZ residents. It is reasonable to assume that soon Los Angeles County could be the majority commute destination for Simi Valley UAZ residents (48.2%) and possibly for Thousand Oaks UAZ residents (44.9%). Given the baseline numbers, it does not seem likely that a majority of Simi Valley UAZ (35.2%) and Thousand Oaks/Moorpark UAZ (32.0%) workers will commute from Los Angeles in the near future. As such, from the 2018 LODES data, it seems likely that only one of the two criteria could be met to combine either the Simi Valley UAZ or the Thousand Oaks/Moorpark UAZ into Los Angeles. The LODES data is presented below in Figures 1 and 2.

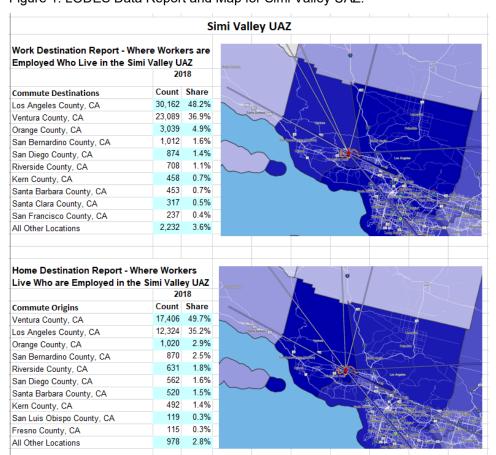
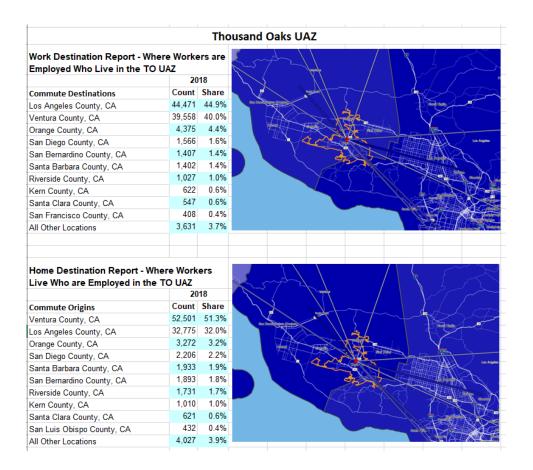


Figure 1. LODES Data Report and Map for Simi Valley UAZ.

Figure 2. LODES Data Report and Map for Thousand Oaks UAZ.



ATTACHMENT

May 13, 2021

Mr. Vincent Osier Geography Division United States Census Bureau Washington, DC 20233-7400

RE: Urban Area Definition Criteria

Dear Mr. Osier:

The Ventura County Transportation Commission (VCTC) appreciates this opportunity to comment on the proposed Urban Area Definition Criteria proposed in your agency's February 19, 2021 Federal Register Notice. This comment addresses the hop and jump criteria, and the proposed use of LEHD Program data

For background, Ventura County, California, currently contains all or part of six different urbanized areas, separated by extensive rural territory. The shape of urbanized areas are often characterized by some long narrow strips representing developed areas along road corridors, often consisting of no more than a row of homes on each side of the road, sometimes extending several miles in length. Since these strips are running through largely rural areas, they are generally not perceived as being urban locations. Furthermore, in one instance, a narrow strip approximately two (2) miles in length results in a discrete town area, the Ojai Valley, being joined to the Oxnard UZA, even though due to its low population and almost completely rural surroundings it is generally perceived as being discrete from the Oxnard area. (The Ojai Valley area appears as the large appendage on the north side of the Oxnard UZA.)

Based on this issue, VCTC supports the proposal to reduce the allowable jump length to 1.5 miles, as this will tend to lessen the tendency of joining narrow strips to urbanized areas. However, VCTC also requests that the Census Bureau consider limiting the allowable length of a narrow urban strip, to recognize that the further a strip extends into a rural area, the more rural in nature it becomes.

It should be noted that, prior to 2000, the Ojai Valley was defined as a rural area, before it was joined to the Oxnard UZA. VCTC believes the urbanized area criteria ought to result in Ojai Valley returning to rural status, rather than remaining joined to Oxnard Urban Area.

In addition, the Census Bureau proposes to use worker flow data (i.e., commute patterns) from the Longitudinal Employer-Household Dynamics (LEHD) Program to identify whether commuting patterns reflect a functionally integrated region or distinct urban areas. The Bureau proposes to analyze aggregate commuter flows into and out of each urban area, and urban areas would be merged if the commute data reflects that the following conditions are met: "50 percent or more of the workers in the smaller urban area are working in the larger urban area and 50 percent or more of the jobs in the smaller urban area are filled by workers residing in the larger urban area."

While it is reasonable to consider employment commute patterns for determining urban area boundaries, the Census Bureau should consider the possibility that the LEHD Origin-Destination Employment Statistics (LODES) data contains a bias toward central cities due to the location of offices where unemployment insurance and other administrative records are maintained that LODES relies on for this data. LEHD was intended as an economic survey and relies primarily on Unemployment Insurance records, which can be based from an office location that is not necessarily the same as the job location. According to the Census Bureau,

Under the LEHD Partnership, states agree to share Unemployment Insurance earnings data and the Quarterly Census of Employment and Wages (QCEW) data with the Census Bureau. The LEHD program combines these administrative data, additional administrative data and data from censuses and surveys. From these data, the program creates statistics on employment, earnings, and job flows at detailed levels of geography and industry and for different demographic groups. In addition, the LEHD program uses these data to create partially synthetic data on workers' residential patterns. ¹

As a result, using the LODES data to make such determinations may overestimate connectivity with a central city when compared to other origin-destination data sources, such as the Census Transportation Planning Products (CTPP) and regional and local traffic models. For example, VCTC staff selected three cities (Simi Valley, Thousand Oaks, and Camarillo) for a comparison of data from the Ventura County Traffic Model (VCTM), CTPP, and LODES. As shown in Exhibit A, in all three cases, the LODES data reflects comparably much lower internal-internal commute trips and higher Non-Ventura County trips. While our analysis reflects that these example cities would not meet the proposed criteria of 50 percent or more workers travelling in/out of these urban areas to the Los Angeles urban area, we suggest that the Census Bureau consider use of alternate data sources or possible corrections to LODES data when applied to possible mergers of urban areas.

Should you have any comments regarding this comment, please contact Peter De Haan of my staff at (805) 642-1591, extension 106.

Sincerely,

Darren M. Kettle Executive Director

¹ United States Census Bureau. Longitudinal Employer-Household Dynamics – About Us. https://lehd.ces.census.gov/. Accessed 04/30/2021.