



Metro

Los Angeles County
Metropolitan Transportation Authority

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**SAN FERNANDO VALLEY SERVICE COUNCIL
MARCH 2, 2016**

SUBJECT: FINDINGS OF THE FEBRUARY 2016 PUBLIC HEARING

**ACTION: APPROVE FINDINGS OF PUBLIC HEARING AND ADOPT STAFF
RECOMMENDATIONS**

RECOMMENDATION

- 1) Approve findings of public hearings conducted in February 2016 for implementation of proposed changes.
- 2) Adopt staff's recommended service plan.

ISSUE

Federal guidelines and MTA policy require that a public hearing be held when major service changes to the bus system are considered. Accordingly, the affected Service Councils conducted a series of public hearings in February 2016, along with a Saturday hearing conducted at the Gateway Headquarters. The purpose of the hearings was to solicit public input, written comments, and verbal testimony regarding proposed service changes to 24 bus lines that operate throughout the Metro region. These changes are slated for implementation on June 26, 2016 or later.

A review of public input, an analysis of impacts, and staff's service change recommendations are outlined in this report. The Service Councils are asked to consider the possible impacts from these proposals before approval.

ALTERNATIVES CONSIDERED

Alternatives to the staff recommendation are to 1) adopt a new subset of the proposals or 2) not adopt the revised service changes. Staff's recommendations encourage connectivity and optimize efficiency of travel demand patterns however the Service Council may select other alternatives that may benefit the most patrons.

DISCUSSION

In compliance with federal public hearing requirements and MTA's administrative code, each Service Council is required to conduct a public hearing and consider public testimony before approving significant modifications to the bus system. As part of this process, each Service Council, respectively, is also required to consider potential

impacts these changes may have on the community.

Each year Metro service development staff reviews bus routes to identify opportunities to improve productivity, safety, cost effectiveness, capacity utilization, and service quality. During this round of public hearings, route modifications were proposed to:

- Introduce a new line connecting the Metro Gold Line in Pasadena with the Metro Red and Orange Lines in North Hollywood;
- Modify lines to serve the new Expo Line Sepulveda Station; and
- Join lines together which have common terminals; allows for improvements in service frequency and eliminates the need to transfer.

The official notice of public hearing was finalized after the December 2015 Service Council meetings and was published in local newspapers beginning January 2016. Due to the systemwide nature of the proposals, public hearings were conducted in February at all five Service Council meetings, as well as one Saturday meeting held at the Metro Gateway headquarters building.

The published Notice of Public Hearing (Attachment A) gives the time, date, and location of each public hearing. Additional notices were subsequently published in other local, regional, and foreign language newspapers system-wide, where appropriate. Approximately 81,000 marketing take-ones were distributed on buses, trains, and at customer service outlets informing riders of the proposals under consideration. The Notice of Public Hearing was also posted on Metro's main website, along with a link to maps showing the proposed changes. Patrons could also send responses to Metro via email at servicechanges@metro.net, fax, or mail.

In addition to the public hearings, staff presented the proposed changes to the February meetings of the Metro Citizen's Advisory Committee, General Managers, and Quarterly Transit Providers.

At the public hearings, staff asked attendees to indicate how they heard of the hearings. Of the 180 who signed in at the six meetings, the following data was collected:

Outreach Method	Number of Patrons
Brochure	52
Friend	28
Metro Website	20
Email	17
Facebook	8
The Source Blog	7
Twitter	2

Summary of Public Comment

A total of 27 individuals attended the San Fernando Valley Public Hearing; 15 of those individuals provided verbal testimony. A total of 54 comments were received in the form of testimonies, letters, facsimiles and emails by midnight Saturday, February 13, 2016, the close of the public record.

Of the total testimony received systemwide via all methods, approximately 48% (26 comments) supported the proposals. Nearly 11% (6 comments) opposed, and another 26% (14 comments) suggested modifications to the service change proposals. Roughly 15% (8) of the comments received were unrelated to the Public Hearing's proposed changes. A summary table of the comments listed by bus line is provided on the following table:

JUNE 2016 SERVICE CHANGE

Line	Line Description	Service Change Proposals	SERVICE COUNCIL					Support	Against	Modify	Other
			SFV	SGV	GC	SB	WC				
156 & 237	156: Panorama City to Hollywood via Highland Av, Vineland Av & Van Nuys Bl 236 / 237: Sylmar Station - Encino - Sherman Oaks via Balboa - Woodley	Routes 236 & 237 will be separated. Route 236 will operate as a stand-alone route and Route 237 will be absorbed by Line 156 providing a new continuous line from Hollywood to Granada Hills.	X					4	1	2	1
234 / 734	Sylmar to Westwood via Sepulveda Bl	Late night, Saturday and Sunday extension from Westwood to the Sepulveda Expo Line Station.	X					8	2	5	2
501	New Metro Express Line connecting the Orange and Red Lines in North Hollywood with the Gold Line in Pasadena.	New Metro Express Line connecting the Orange and Red Lines in North Hollywood with the Gold Line in Pasadena.	X	X				8	2	4	2
788	Metro Valley - Westwood Express	Extend Line 788 from Wilshire/Westwood south to Sepulveda Expo Station	X					6	1	3	3
TOTAL:							26	6	14	8	
TOTAL COMMENTS:							54				

Recommendations

The following summarizes the service proposal followed by staff's recommendation:

Line 156 – Panorama City to Hollywood via Highland Av, Vineland Av & Van Nuys Bl

Proposal – Combine with Line 236, Route 237 on Van Nuys Bl at the Orange Line, providing a new continuous line from Hollywood to Granada Hills.

Recommendation – Operate as proposed.

Line 234 – Sylmar – Westwood via Sepulveda Bl

Proposal – Late night, early morning, Saturday and Sunday extension from Westwood to Sepulveda Expo Line Station, when opened.

Recommendation – Operate as proposed.

Line 501 – NoHo – Pasadena Express

Proposal – New Express service between Metro North Hollywood Red/Orange Line Stations to Metro Del Mar Gold Line Station.

Recommendation – Operate as proposed.

Line 734 – Sylmar Station – Westwood via Sepulveda Bl

Proposal – Extend service from Westwood to Sepulveda Expo Line Station, when opened.

Recommendation – Operate as proposed.

Line 788 – Metro Valley – Westwood Express

Proposal – Extend service from Westwood to Sepulveda Expo Line Station, when opened.

Recommendation – Operate as proposed.

Impact to Budget

Changes to Line 156 and 237 are cost neutral. Line 501 costs were previously approved by the Board for the pilot project and are included in the FY17 budget. The extension of Lines 234, 734 and 788 will cost 8,750 revenue service hours, which is included in the FY17 budget.

TITLE VI AND ENVIRONMENTAL JUSTICE EVALUATION

There is no Disparate Impact on minority populations, and no Disproportionate Burden on poverty populations resulting from the proposed changes to San Fernando Valley services.

NEXT STEPS

The proposals considered for public hearing and final recommendations as approved by the Service Councils will be presented to the Metro Board as a receive and file report.

The proposed changes will be implemented with the June 26, 2016 service changes or later. Line 501 pilot service will begin service on March 1, 2016.

ATTACHMENTS

Attachment A – Notice of Public Hearing

Attachment B-1 – Equity Evaluation of Proposed Major Service Changes for June 2016

Attachment B-2 – Line 577 Proposed Exemption from Express Charges (Fare Equity Analysis)

Attachment B-3 – Lines 190/194 & 270 Discontinuation and Replacement by Foothill Transit (Fare Equity Analysis)

Attachment C – Summary of Public Comment

Prepared by: Israel Marin, Transportation Planner

Scott Page, Director of Service Performance and Analysis

Jon Hillmer, Executive Director, Service Development, Scheduling and Analysis

NOTICE OF PUBLIC HEARING
Los Angeles County Metropolitan Transportation Authority

The Los Angeles County Metropolitan Transportation Authority will hold public hearings in February 2016 to receive community input on proposed modifications to Metro's bus service. Approved changes will become effective June 2016 or later. Details of the hearing dates, times, and locations are listed at the end of this notice.

The upcoming public hearings are being held in conformance with federal public hearing requirements outlined in Section 5307 (d) 1 of Title 49 U.S.C., and public hearing guidelines outlined in Section 2-50-025 of Metro's Administrative Code, as amended.

Listed below are the service proposals to be considered at the hearings, and the respective Service Councils that will host the public hearings. In general, the proposed modifications will improve the efficiency and effectiveness of the public transportation system through a better use of resources. The public can attend any of these hearings and comment on proposals of interest to them.

LINE	LINE NAME	PROPOSED SERVICE CHANGE	San Fernando Valley	San Gabriel Valley	Gateway Cities	South Bay	Westside Central
16/316	Downtown Los Angeles - Century City via 3rd St	Combine with Line 220 at Cedar Sinai Hospital, providing one continuous line via new branch Line 17.					X
51/52/ 351/ 352	Wilshire Ctr – Downtown LA – Compton- Harbor Gateway TC via Avalon	Discontinue Limited Stop Line 352 and replace with new Limited Stop Line 351. All existing limited stops on Line 352 will be served by the new Line 351. Line 51 operates more frequently than Line 52; therefore a new Line 351 will benefit more riders with a faster service.			X	X	X
68	Downtown LA – Montebello via Chavez – E. 1st St	Replace the 1st St route segment from Indiana Station to East LA College with new Line 106. This new line will also operate to County USC Hospital and replace a large portion of Line 620. (See Line 620 below).		X			X
106	County USC Hospital – Indiana Sta – East LA College	Proposed new Line 106 will operate as a replacement to a portion of Line 68 on E 1st St and a large portion of Line 620.		X			X
111 /311	LAX City Bus Center – Norwalk Sta via Florence Av	Discontinue Line 311 limited stop service and operate as local service.			X	X	

LINE	LINE NAME	PROPOSED SERVICE CHANGE	San Fernando Valley	San Gabriel Valley	Gateway Cities	South Bay	Westside Central
156	Panorama City to Hollywood via Highland Av, Vineland Av & Van Nuys Bl	Combine with Line 236, Route 237 on Van Nuys Bl at the Orange Line, providing a new continuous line from Hollywood to Granada Hills. (See Line 236/237 below)	X				X
175	Silverlake – Hollywood via Hyperion Av – Sunset Bl	Remove two underutilized mid-day trips.					X
190/ 194	El Monte Sta - Cal Poly Pomona via Ramona Bl & Valley Bl	Discontinue service, possibly to be operated by another provider.		X			
220	Beverly Ctr – Culver City Sta via Robertson Bl	Replace Line 220 with a branch route of Line 16 at Cedar Sinai Hospital; new branch Line 17 would operate from downtown LA to Culver City Expo Station.					X
234	Sylmar – Westwood via Sepulveda Bl	Late night, early morning, Saturday and Sunday extension from Westwood to Sepulveda Expo Line Station, when opened.	X				X
236/ 237	Sylmar Sta – Encino via Glenoaks Bl, Balboa Bl Encino – Granada Hills – Sherman Oaks via Balboa Bl, Woodley Av, Victory Bl, Van Nuys Bl	Combine Route 237 with Line 156 on Van Nuys Bl at the Orange Line, providing a new continuous line from Hollywood to Granada Hills.	X				
258	Alhambra - Paramount via Fremont Av & Eastern Av	Join line with Line 485 at Cal State LA, providing a continuous line from Paramount to Pasadena.		X	X		
270	Monrovia – Norwalk Sta via Workman Mill – Peck Rds	Discontinue service, possibly to be operated by another provider.		X	X		
460	Downtown LA – Disneyland via Harbor Transitway – I-105 Fwy	Discontinue route segment from Downtown LA to Norwalk Green Line Station (replacement service provided by Metro Silver Line, Silver Express, Blue Line, and Green Line).			X		X
485	Downtown LA – Altadena via Fremont – Lake Avs	Discontinue service from Downtown LA to Cal State LA. Service north of Cal State LA will be operated to Altadena by an extension of Line 258.		X			X
501	NoHo – Pasadena Express	New express service between Metro North Hollywood Red/Orange Line Stations to Metro Del Mar Gold Line Station.	X	X			

LINE	LINE NAME	PROPOSED SERVICE CHANGE	San Fernando Valley	San Gabriel Valley	Gateway Cities	South Bay	Westside Central
577	El Monte Sta – Long Beach VA Medical Center via I-605 Fwy	Add three stops between El Monte Station and Rio Hondo College. Exclude Line 577 from the express premium fare policy (requires Board of Directors approval).		X	X		
620	Boyle Heights Shuttle	Discontinue service on Cesar E. Chavez, Forest Av, Wabash Av, Evergreen Av, Mott St, and 1st St. Replacement service is provided by the current routes of Lines 30, 68, 71, and 770. The remaining service will operate from the USC Medical Center, State St, 1st St, Boyle Av, Whittier Bl, Soto St, 4th St, Indiana St, then continuing out 1st St along the route of Line 68 to East LA College (see Line 68 above). The new service will be renumbered to Line 106 operating in both directions. Hours and days of operation will remain unchanged.		X			X
704	Downtown Santa Monica via Santa Monica Bl	Make permanent experimental improvement of weekday mid-day service from every 20 minutes to every 15 minutes.					X
734	Sylmar Sta – Westwood via Sepulveda Bl	Extend service from Westwood to Sepulveda Expo Line Station, when opened.	X				X
788	Metro Valley – Westwood Express	Extend service from Westwood to Sepulveda Expo Line Station, when opened.	X				X



Metro

PUBLIC HEARING SCHEDULE

SAN FERNANDO VALLEY

Wednesday, February 3, 2016

6:30PM

Marvin Braude Constituent Center
6262 Van Nuys Blvd.
Van Nuys, CA 91401

SOUTH BAY

Thursday, February 4, 2016

6:00PM

Carson Community Center
Adult Lounge
801 E. Carson
Carson, CA 90745

REGIONAL LOCATION

Saturday, February 6, 2016

10:00AM

Metro Boardroom
1 Gateway Plaza, 3rd Floor
Los Angeles, CA 90012

SAN GABRIEL VALLEY

Monday, February 8, 2016

6:00pm

Metro El Monte Division 9 Building
3449 Santa Anita Ave.
3rd Floor Service Council
Conference Room
El Monte, CA 91731

WESTSIDE/CENTRAL

Wednesday, February 10, 2016

6:00PM

Metro Headquarters Building
1 Gateway Plaza
Union Station Conference Room
Los Angeles, CA 90012

GATEWAY CITIES

Thursday, February 11, 2016

6:00 p.m.

Norwalk Arts & Sport Complex
Sproul Reception Center
12239 Sproul St.
Norwalk, CA 90650

The public hearings will commence at the listed times and will close after all oral testimony has been received by those members of the public present in accordance with hearing guidelines.

Note: These proposals may be approved in whole or in part at a date following the public hearings. Approved changes may also include other alternatives derived from public comment. Interested members of the public are encouraged to attend the upcoming hearings and provide testimony on any service proposal under consideration (public comment will not be restricted to only bus routes operating in one geographical area). All public comment received will be forwarded to the responsible Service Council, and considered prior to taking action on the service proposals. Persons unable to attend the hearings may submit written testimony postmarked through midnight Saturday, February 13, 2016, the close of the public record.

Comments sent via U.S Mail should be addressed to: **Metro Customer Relations**

Attn: June 2016 Service Changes
1 Gateway Plaza, 99-PL-4
Los Angeles, CA 90012-2932

Comments via e-mail should be addressed to: servicechanges@metro.net

Attn: "June 2016 Service Changes"

Facsimiles should be addressed as above and sent to: 213-922-6988.

ADA REQUIREMENTS: Upon request, sign language interpretation, materials in alternative formats and other accommodations are available to the public for MTA sponsored meetings and events.

LIMITED ENGLISH PROFICIENCY: Upon request, interpreters are available to the public for MTA sponsored meetings and events. Agendas and minutes will also be made available in other languages upon request.

All requests for reasonable accommodations, interpretation services and materials in other languages must be made at least three working days (72 hours) in advance of the scheduled meeting date. Please submit requests by calling (213) 922-4600 between 8 a.m. and 5 p.m., Monday through Friday. Our TDD line is (800) 252-9040. Individuals with hearing or speech impairment may use California Relay Service 711 + Metro phone number.

ATTACHMENT B-1

**Service Equity Analysis
Methodology & Results**

**June 2016
Proposed Major Service Changes
Prepared January 2016**

Service Planning and Scheduling
Civil Rights Programs Compliance

Contents

1.	Proposal Overview	1
2.	Methodological Approach.....	1
	Data Sources.....	2
	Methodology.....	2
3.	Results.....	3

1. PROPOSAL OVERVIEW

A proposed program of service changes for possible implementation in June 2016, or later, is scheduled for public comment in February 2016. The major service changes contained in that proposal are the subject of this equity evaluation.

2. METHODOLOGICAL APPROACH

A Service Equity Evaluation is presented herein in accordance with the requirements of Federal Transit Administration Circular 4702.1B. The evaluation assesses whether or not there are adverse disparate impacts on minority passengers and/or disproportionate burdens on low income riders arising from the proposed major service changes that will be considered at public hearings in February 2016.

The proposed changes have been grouped by type of change for this analysis. There are three groups consisting of routes or segments proposed for discontinuation, routes or segments that represent new services, and routes proposed for increased service frequency. Each group is evaluated separately using demographic data associated with the group's services.

Only the major service change proposals as defined in Metro's Administrative Code Section 2-50 are included in this analysis. There are additional proposals being presented for public comment that are not a part of this evaluation. A service change is considered major if it meets one or more of the following criteria:

A revision to an existing transit route that increases or decreases the route miles by 25% or the revenue service miles operated by the lesser of 25%, or by 250,000 annual revenue service miles at one time or cumulatively in any period within 36 consecutive month;

A revision to an existing transit service that increases or decreases the revenue hours operated by at least 25% or by 25,000 annual revenue service hours at one time or cumulatively in any period within 36 consecutive months;

A change of more than 25% at one time or cumulatively over any period within 36 consecutive months in the number of total revenue trips scheduled on routes serving a rail or BRT station, or an off-street bus terminal serving at least 4 bus routes;

A change of more than 20% of the total system revenue miles or revenue hours in any 12 month period;

The implementation of any new transit route that results in a net increase of more than 25,000 annual revenue hours or 250,000 annual revenue miles;

Six months prior to the opening of any new fixed guideway project (e.g. BRT line or rail line) regardless of whether or not the amount of service being changed meets the requirements in the new subsections 1 – 5 above.

Two proposals meeting the criteria for major changes have been excluded from this analysis as the Administrative Code provides an exception to the equity evaluation requirement when a service is replaced by a different mode or operator providing a service with the same headways, fare, transfer options, span of service and stops. The proposed discontinuation of Lines 190-194 and 270 is contingent on the assumption of service by Foothill Transit. Because there are differences in the fares charged by the involved operators, these two proposals are the subject of a separate fare equity evaluation.

Data Sources

Data on the ethnicity of Metro's service area population is obtained from block group level data from the 2010 U. S. Census. Poverty income data is from the American Community Survey administered by the U. S. Census for the five year period from 2006-2010 and is provided at the census tract level.

Methodology

For any route or route segment included in this evaluation the population and minority population of each block group that is at least partially included in a buffer area around each stop served by the affected route or segment is accumulated. The buffer is generally a circle of one-quarter mile radius around each stop. For rail stations the buffer has a one-half mile radius, and for major park/ride facilities the buffer has a five mile radius. Similarly, census tract level data for population and poverty population is accumulated from all tracts at least partially included in each buffer.

The major changes are grouped by type of change (discontinuation, new service, or increased frequency), and the associated population, minority population, and poverty population is accumulated for each group. Each group's overall minority population share and poverty population share is compared with the corresponding Metro service area shares to determine whether or not a disparate impact, or disproportionate burden would result.

3. RESULTS

The Board of Directors has adopted thresholds for determining when disparate impacts and/or disproportionate burdens are imposed by a proposed service change action.

A disparate impact occurs when the absolute difference between the minority share of the impacted population and the minority share of Metro's service area population exceeds 5%, and/or the relative difference between the minority share of the impacted population and the minority share of Metro's service area population exceeds 20%.

A disproportionate burden occurs when the absolute difference between the impacted poverty population share and the Metro service area poverty population share exceeds 5% and/or the relative difference between the poverty population share of the impacted population and the poverty share of Metro's service area population exceeds 20%.

The results of this equity evaluation are shown in Table 1. There is no disparate impact or disproportionate burden resulting from the service discontinuation and new service actions. The increased frequency proposed for Line 704 would result in a disparate impact on the minority population along its route, but would not result in a disproportionate burden on the poverty population in its corridor.

When a disparate impact is found the proposed action may only be implemented if (1) there is a substantial legitimate justification for the proposed service change, and (2) there are no alternatives that would have a less disparate impact and still accomplish the goals of the action. In this instance, the action is proposed to conform passenger loading during the midday to recently revised passenger loading standards. There are no alternatives to adding service to reduce passenger loading, and not doing so would violate adopted Board policy resulting in crowding.

Table 1 Equity Evaluation of Major Service Change Proposals for June 2016

DISCONTINUATION OF ROUTE OR SEGMENT

Line	Description	Adverse Action	Beneficial Action	Title VI			EJ		
				Population	Minority	%	Population	Poverty	%
111	Discontinue Route 311	X		-244,310	-228,526	93.5%	-349,160	-69,406	19.9%
156	Discontinue Burbank/Kester/Oxnard Loop	X		-18,579	-10,684	57.5%	-28,901	-5,638	19.5%
220	Discontinue line	X		-53,401	-16,915	31.7%	-68,042	-7,522	11.1%
236	Discontinue branch line 237	X		-164,559	-92,194	56.0%	-204,516	-24,570	12.0%
258	Discontinue service east of Fremont/Commonwealth	X		-32,739	-29,082	88.8%	-38,056	-6,028	15.8%
460	Discontinue service west of Norwalk Station	X		-81,896	-65,143	79.5%	-85,549	-34,872	40.8%
485	Discontinue line	X		-120,667	-87,390	72.4%	-154,781	-22,285	14.4%
620	Discontinue service between Indiana Station State St via Chavez	X		-44,714	-43,893	98.2%	-59,995	-15,659	26.1%
Total				-760,865	-573,827	75.4%	-989,000	-185,980	18.8%
						Metro Service Area	70.5%	15.9%	
						Absolute Difference	4.9%	2.9%	
						Relative Difference	7.0%	18.3%	

NEW SERVICE

Line	Description	Adverse Action	Beneficial Action	Title VI			EJ		
				Population	Minority	%	Population	Poverty	%
156	Extend from Van Nuys/Burbank via Route 237 to Mission Hills		X	95,656	63,639	66.5%	111,257	15,776	14.2%
258	Add extension to CSULA		X	10,547	9,585	90.9%	16,006	1,889	11.8%
258	Add extension from Fremont/Commonwealth to Altadena		X	74,390	46,329	62.3%	113,333	11,858	10.5%
501	New service		X	44,623	20,922	46.9%	63,759	8,731	13.7%
620	Extend service from Indiana Station to E. LA College via 1st. St.		X	49,274	48,029	97.5%	66,030	12,143	18.4%
Total				274,490	188,504	68.7%	370,385	50,397	13.6%
						Metro Service Area	70.5%	15.9%	
						Absolute Difference	-1.8%	-2.3%	
						Relative Difference	-2.6%	-14.4%	

INCREASED FREQUENCY

Line	Description	Adverse Action	Beneficial Action	Title VI			EJ		
				Population	Minority	%	Population	Poverty	%
704	Add midday service (cumulative impact)		X	259,255	126,979	49.0%	313,798	57,176	18.2%
Total				259,255	126,979	49.0%	313,798	57,176	18.2%
						Metro Service Area	70.5%	15.9%	
						Absolute Difference	-21.5%	2.3%	
						Relative Difference	-30.5%	14.6%	

ATTACHMENT B-2

**Fare Equity Analysis
Methodology & Results**

**Line 577
Proposed Exemption from Express Charges
December 2015**

Service Planning and Scheduling
Civil Rights Programs Compliance

Contents

1.	Proposal Overview	1
2.	Methodological Approach.....	1
	Data Sources.....	1
	Step By Step Methodology.....	1
3.	Results.....	3

1. PROPOSAL OVERVIEW

In an effort to increase ridership on a poorly patronized express bus line, Metro is proposing to eliminate express fare charges on Line 577 effective with the June 2016 Service Change Program.

2. METHODOLOGICAL APPROACH

A Title VI Fare Equity Evaluation is presented herein in accordance with the requirements of Federal Transit Administration Circular 4702.1B. The evaluation assesses whether or not there are adverse disparate impacts on minority passengers and/or disproportionate burdens on low income riders arising from the proposed exemption of Line 577 riders from express fare charges.

Express fare charges are only applicable on Metro Express bus lines, including the Metro Silver Line for which the express premium is built into the line fare. As only the express premium fare is affected by this proposal, the demographics of Line 577 riders will be compared with those of all express riders to determine whether some portion of this group is disparately impacted and/or disproportionately burdened by the proposed action.

Data Sources

Data on the ethnicity and household income levels of riders of specific Metro bus lines is obtained from the systemwide Onboard Survey conducted in 2012. Two express lines, Line 439 and Line 445, are no longer operated, however, riders of former Line 445 are now almost entirely users of the Metro Silver Line.

Poverty level household income was not determined in the Onboard Survey, so Low Income, defined as less than \$25,000, was used for the evaluation.

Step By Step Methodology

The following steps were performed to complete the analysis:

- Data for the numbers of linked trips surveyed by express route and by ethnicity were obtained from the Onboard Survey database (Table 1);

Table 1 Surveyed Linked Trips by Route and by Ethnicity

	MT-439	MT-442	MT-445	MT-450	MT-460	MT-485	MT-487	MT-489	MT-534	MT-550	MT-577	MT-910	Total
Asian	5		9	13	11	39	53	23	1	18	17	31	220
Black	9	6	44	16	136	160	89	7	171	105	77	86	906
Hispanic	6		19	6	10	26	24	2	21	15	21	18	168
White	13	24	23	6	29	49	12	3	8	39	25	22	253
Native Amer					1	2				2	2	1	8
Totals	33	30	95	41	187	276	178	35	201	179	142	158	1555

Data for the numbers of linked trips surveyed by express route and by household income category were obtained from the Onboard Survey database (Table 2);

Table 2 Surveyed Linked Trips by Route and by Household Income

	MT-439	MT-442	MT-445	MT-450	MT-460	MT-485	MT-487	MT-489	MT-534	MT-550	MT-577	MT-910	Total
\$10,000-\$14,999	2	2	10	2	28	30	19	2	41	32	25	14	207
\$135,000 and more	1	1	12	3	34	32	22		58	35	14	21	233
\$15,000-\$24,999	2	3	12	2	27	41	17	5	31	26	22	17	205
\$25,000-\$34,999	9	4	20	1	28	44	36		21	30	20	23	236
\$35,000-\$49,999	3	2	8	1	21	31	19	3	17	9	14	18	146
\$5,000-\$9,999	6	5	10	5	12	18	18	7	2	14	13	11	121
\$50,000-\$69,000	4	8	4	5	14	22	7	4	4	13	8	11	104
\$70,000-\$134,999	5	3	12	10	7	18	11	9	3	5	8	25	116
less than \$5,000			1	7	4	5	9	2	1	3	6	12	50
Totals	32	28	89	36	175	241	158	32	178	167	130	152	1418

- The percentages of surveyed linked trips by route and by ethnicity (Table 3), and the percentages of surveyed linked trips by route and by household income (Table 4) were then calculated;

Table 3 Percentage of Surveyed Linked Trips by Route and by Ethnicity

	MT-439	MT-442	MT-445	MT-450	MT-460	MT-485	MT-487	MT-489	MT-534	MT-550	MT-577	MT-910	Total
Asian	15.15%	0.00%	9.47%	31.71%	5.88%	14.13%	29.78%	65.71%	0.50%	10.06%	11.97%	19.62%	14.15%
Black	27.27%	20.00%	46.32%	39.02%	72.73%	57.97%	50.00%	20.00%	85.07%	58.66%	54.23%	54.43%	58.26%
Hispanic	18.18%	0.00%	20.00%	14.63%	5.35%	9.42%	13.48%	5.71%	10.45%	8.38%	14.79%	11.39%	10.80%
White	39.39%	80.00%	24.21%	14.63%	15.51%	17.75%	6.74%	8.57%	3.98%	21.79%	17.61%	13.92%	16.27%
Native Amer	0.00%	0.00%	0.00%	0.00%	0.53%	0.72%	0.00%	0.00%	0.00%	1.12%	1.41%	0.63%	0.51%
Totals	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

Table 4 Percentage of Surveyed Linked Trips by Route and by Household Income

	MT-439	MT-442	MT-445	MT-450	MT-460	MT-485	MT-487	MT-489	MT-534	MT-550	MT-577	MT-910	Totals
less than \$5,000	0.00%	0.00%	1.12%	19.44%	2.29%	2.07%	5.70%	6.25%	0.56%	1.80%	4.62%	7.89%	3.53%
\$5,000-\$9,999	18.75%	17.86%	11.24%	13.89%	6.86%	7.47%	11.39%	21.88%	1.12%	8.38%	10.00%	7.24%	8.53%
\$10,000-\$14,999	6.25%	7.14%	11.24%	5.56%	16.00%	12.45%	12.03%	6.25%	23.03%	19.16%	19.23%	9.21%	14.60%
\$15,000-\$24,999	6.25%	10.71%	13.48%	5.56%	15.43%	17.01%	10.76%	15.63%	17.42%	15.57%	16.92%	11.18%	14.46%
\$25,000-\$34,999	28.13%	14.29%	22.47%	2.78%	16.00%	18.26%	22.78%	0.00%	11.80%	17.96%	15.38%	15.13%	16.64%
\$35,000-\$49,999	9.38%	7.14%	8.99%	2.78%	12.00%	12.86%	12.03%	9.38%	9.55%	5.39%	10.77%	11.84%	10.30%
\$50,000-\$69,000	12.50%	28.57%	4.49%	13.89%	8.00%	9.13%	4.43%	12.50%	2.25%	7.78%	6.15%	7.24%	7.33%
\$70,000-\$134,999	15.63%	10.71%	13.48%	27.78%	4.00%	7.47%	6.96%	28.13%	1.69%	2.99%	6.15%	16.45%	8.18%
\$135,000 and more	3.13%	3.57%	13.48%	8.33%	19.43%	13.28%	13.92%	0.00%	32.58%	20.96%	10.77%	13.82%	16.43%
Totals	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

- The percentages of Line 577 and All Express Minority riders were compared, and the absolute and relative differences between these shares were calculated (Table 5); and

Table 5 Comparison of Minority Rider Shares

	MT-577	All Express
Minority Share	82.39%	83.73%
Absolute Difference	-1.34%	
Relative Difference	-1.6%	

- Finally, the percentages of Line 577 and All Express Low Income riders were compared, and the absolute and relative differences between these shares were calculated (Table 6).

Table 6 Comparison of Low Income Rider Shares

	MT-577	All Express
Low Income Share	50.77%	41.11%
Absolute Difference	9.65%	
Relative Difference	23.5%	

3. RESULTS

The Board of Directors has adopted thresholds for determining when disparate impacts and/or disproportionate burdens are imposed by a proposed action.

A disparate impact occurs when the absolute difference between the minority share of impacted riders and the minority share of similarly situated riders not directly impacted exceeds 5%, and/or the relative difference between the minority share of impacted riders and the minority share of similarly situated riders not directly impacted exceeds 35%.

A disproportionate burden occurs when the absolute difference between the low income share of impacted riders and the low income share of similarly situated riders not directly impacted exceeds 5%, and/or the relative difference between the low income share of impacted riders and the low income share of similarly situated riders not directly impacted exceeds 35%.

In the case of the proposed exemption of Line 577 from express premium charges, Table 5 shows that there is no disparate impact on minority riders from this action. Table 6 shows that there is an impact on low income riders, however, because this is a positive impact, no mitigation measures are required.

ATTACHMENT B-3

**Fare Equity Analysis
Methodology & Results**

**Lines 190/194 & 270
Discontinue & Replace with Foothill Transit
January 2016**

Service Planning and Scheduling
Civil Rights Programs Compliance

Contents

1.	Proposal Overview	1
2.	Methodological Approach.....	1
	Data Sources.....	1
	Detailed Methodology.....	2
3.	Results.....	6

1. PROPOSAL OVERVIEW

Metro currently operates two bus lines that are largely within the service area of Foothill Transit, a lower cost provider. Under consideration is discontinuation of these services by Metro, and assumption of their operation by Foothill Transit effective with the June 2016 Service Change Program. A fare equity evaluation is required because of differences between Metro's and Foothill's fare structures.

2. METHODOLOGICAL APPROACH

A Title VI Fare Equity Evaluation is presented herein in accordance with the requirements of Federal Transit Administration Circular 4702.1B. The evaluation assesses whether or not there are disparate impacts on minority riders and/or disproportionate burdens on poverty riders arising from the proposed transfer of operational responsibilities.

This analysis derives bus rider minority and poverty populations by method of fare payment from the Spring 2015 Metro Customer Satisfaction Survey. These data are used to assign minority and poverty ridership shares to each method of payment in Metro's FY2015 Fare Mix data. A correspondence is established between Metro's methods of fare payment and those of Foothill Transit to establish, in each case, whether riders will pay more or less after the transfer of services. Finally, where there are significant differences between a payment method's minority or poverty shares and Metro's overall minority and poverty shares of riders a determination is made whether these constitute disparate impacts and/or disproportionate burdens.

Data Sources

At least once per year Metro conducts a Customer Satisfaction Survey to assess ongoing rider perceptions of service quality, effectiveness, safety, etc. The Spring 2015 survey contains nearly 20,000 observations from riders including information about modal ridership, methods of payment, ethnicity, household size, and household income. The last two items allow determination of whether a rider met the thresholds for poverty established by the federal government.

Annually, following the close of the fiscal year, Metro compiles annual ridership data stratified by method of fare payment. This data is derived from a combination of modal ridership, farebox tabulations, TAP transactions, and prepaid media sales. The FY2015 Fare Mix report was used to obtain this data for this evaluation.

Finally, details of the pricing options afforded by each operator (fare structure) were compiled. This included determination of special considerations such as time of day or specific method of payment that might have a bearing on the amount paid.

Detailed Methodology

Eleven methods of fare payment were specifically enumerated in the Customer Satisfaction Survey, but only seven of these were separately identified in the Fare Mix data for Metro. The payment methods from the survey and their relevance to Metro's Fare Mix data are shown in Table 1.

Table 1 Correspondence of Customer Survey and Fare Mix Payment Methods

Survey Payment Method	Fare Mix Method(s)
Cash	81% Regular Cash 93% Eld/Dis Cash-Peak 93% Eld/Dis Cash-Off Peak 97% Stdnt Reduced Cash
Token	
Metro Xfer	
Interagency Xfer	Transfer (non-OCTA) Transfer-OCTA
Metrolink Xfer	
TAP Stored Value	19% Regular Cash 7% Eld/Dis Cash-Peak 7% Eld/Dis Cash-Off Peak 3% Stdnt Reduced Cash
TAP-Day Pass	Reg Day Pass Eld/Dis Day Pass
TAP-7-Day Pass	7-Day Pass
TAP-30-Day Pass	30-Day Pass Eld/Dis 30-Day Pass Student Pass College Pass
OCTA Pass	
TAP-EZ Pass	Regional Pass

The "Cash" methods of payment in the Fare Mix report included payment with actual cash as well as payment with a TAP Card having stored value. Source data for the Fare Mix report was analyzed to determine the percentage of boardings in each group that used each form of payment – those shares are shown in Table 1. Additionally, because a time of day price difference is offered to Elderly/Disabled riders, further analysis of source data determined that 73.4% of Elderly/Disabled "Cash" boardings occurred during the Off Peak.

For each of the seven payment methods from the Customer Satisfaction Survey with corresponding methods from the Fare Mix report annual bus boardings were obtained from the Fare Mix data. The observed minority and poverty shares of surveyed bus riders were then used to calculate the annual minority and poverty bus boardings for

each payment method. These were then summed to obtain systemwide minority and poverty bus boardings for all methods of payment combined from which an overall minority share of bus riders and poverty share of bus riders was calculated. (Tables 2 and 3).

Table 2 Determination of Minority Shares of Bus Riders

Survey	Metro Bus	Annual Bus Boardings	Annual Minority Boardings	Minority %
Cash		87,378,020	76,501,340	87.6%
	81% REGULAR CASH BRDGS	52,061,959		
	93% ELD/DIS CASH BRDGS-Peak	5,982,300		
	93% ELD/DIS CASH BRDGS-Off Peak	16,507,550		
	97% STDNT REDUCED CASH BRDGS	12,826,211		
IA Xfer		2,562,220	2,046,821	79.9%
	TRANSFER (non-OCTA)	2,366,724		
	TRANSFER OCTA	195,496		
TAP-Stored Value		14,301,536	11,159,300	78.0%
	19% REGULAR CASH BRDGS	12,212,065		
	7% ELD/DIS CASH BRDGS-Peak	450,281		
	7% ELD/DIS CASH BRDGS-Off Peak	1,242,504		
	3% STDNT REDUCED CASH BRDGS	396,687		
TAP-Day Pass		29,302,410	25,998,932	88.7%
	REG DAY PASS BRDGS	26,852,549		
	ELD/DIS DAY PASS BRDGS	2,449,861		
TAP-7-Day Pass	7 DAY PASS BRDGS	49,403,125	45,982,004	93.1%
TAP-30-Day Pass		91,428,226	81,828,547	89.5%
	30 DAY PASS BRDGS	23,972,914		
	ELD/DIS 30 DAY PASS BRDGS	41,163,219		
	STUDENT PASS BRDGS	17,806,822		
	COLLEGE PASS BRDGS	8,485,271		
TAP-EZ Pass	REGIONAL PASS BRDGS	7,684,111	6,579,614	85.6%
	Mapped Totals	282,059,648	250,096,557	88.7%

Table 3 Determination of Poverty Shares of Bus Riders

Survey	Metro Bus	Annual Bus Boardings	Annual Poverty Boardings	Poverty %
Cash		87,378,020	56,166,153	64.3%
	81% REGULAR CASH BRDGS	52,061,959		
	93% ELD/DIS CASH BRDGS-Peak	5,982,300		
	93% ELD/DIS CASH BRDGS-Off Peak	16,507,550		
	97% STDNT REDUCED CASH BRDGS	12,826,211		
IA Xfer		2,562,220	1,384,145	54.0%
	TRANSFER (non-OCTA)	2,366,724		
	TRANSFER OCTA	195,496		
TAP-Stored Value		14,301,536	6,280,073	43.9%
	19% REGULAR CASH BRDGS	12,212,065		
	7% ELD/DIS CASH BRDGS-Peak	450,281		
	7% ELD/DIS CASH BRDGS-Off Peak	1,242,504		
	3% STDNT REDUCED CASH BRDGS	396,687		
TAP-Day Pass		29,302,410	19,415,296	66.3%
	REG DAY PASS BRDGS	26,852,549		
	ELD/DIS DAY PASS BRDGS	2,449,861		
TAP-7-Day Pass	7 DAY PASS BRDGS	49,403,125	34,014,340	68.9%
TAP-30-Day Pass		91,428,226	55,079,800	60.2%
	30 DAY PASS BRDGS	23,972,914		
	ELD/DIS 30 DAY PASS BRDGS	41,163,219		
	STUDENT PASS BRDGS	17,806,822		
	COLLEGE PASS BRDGS	8,485,271		
TAP-EZ Pass	REGIONAL PASS BRDGS	7,684,111	3,689,728	48.0%
	Mapped Totals	282,059,648	176,029,535	62.4%

The next step was to establish a relationship between Metro’s methods of payment and Foothill’s methods of payment. This correspondence is presented in Table 4. Where there are differences in pricing the minority and poverty shares for the price group will be compared to the overall minority and poverty shares to determine whether a significant difference exists. In instances where Foothill does not offer a specific method of payment (shown is NA in Table 4), then other methods of payment applicable to a user of the payment method not offered would be looked at in order to determine whether the rider would be paying more or less than with Metro. Please note that the TRANSFER-OCTA payment method is not applicable to this analysis because such media are only accepted on Metro services operating within Orange County, and the lines being evaluated here do not do so.

Table 4 Metro & Foothill Pricing for Methods of Payment

Survey	Metro Bus	Metro Fare	Foothill Fare		
Cash					
	81% REGULAR CASH BRDGS	\$1.75		\$1.25	
	93% ELD/DIS CASH BRDGS-Peak	\$0.75		\$0.50	
	93% ELD/DIS CASH BRDGS-Off Peak	\$0.35		\$0.50	
	97% STDNT REDUCED CASH BRDGS	\$1.00		\$1.25	
IA Xfer					
	TRANSFER (non-OCTA)	\$.50/\$.25		\$.50/\$.25	
	TRANSFER OCTA	Not Applicable			
TAP-Stored Value					
	19% REGULAR CASH BRDGS	\$1.75	A	\$1.25	B
	7% ELD/DIS CASH BRDGS-Peak	\$0.75	A	\$0.50	C
	7% ELD/DIS CASH BRDGS-Off Peak	\$0.35	A	\$0.50	C
	3% STDNT REDUCED CASH BRDGS	\$1.00	A	\$1.25	B
TAP-Day Pass					
	REG DAY PASS BRDGS	\$7.00		NA	
	ELD/DIS DAY PASS BRDGS	\$2.50		NA	
TAP-7-Day Pass	7 DAY PASS BRDGS	\$25.00		NA	
TAP-30-Day Pass					
	30 DAY PASS BRDGS	\$100.00		\$70.00	D
	ELD/DIS 30 DAY PASS BRDGS	\$20.00		\$22.00	D
	STUDENT PASS BRDGS	\$24.00		\$33.00	D
	COLLEGE PASS BRDGS	\$43.00		\$33.00	D
TAP-EZ Pass	REGIONAL PASS BRDGS	\$110/\$42		\$110/\$42	
		Note A:	Free Transfer		
		Note B:	\$0.50 Transfer		
		Note C:	\$0.25 Transfer		
		Note D:	31-Day Pass		

3. RESULTS

The Board of Directors has adopted thresholds for determining when disparate impacts and/or disproportionate burdens are imposed by a proposed action.

A disparate impact occurs when the absolute difference between the minority share of impacted riders and the minority share of similarly situated riders not directly impacted exceeds 5%, and/or the relative difference between the minority share of impacted riders and the minority share of similarly situated riders not directly impacted exceeds 35%.

A disproportionate burden occurs when the absolute difference between the poverty share of impacted riders and the poverty share of similarly situated riders not directly impacted exceeds 5%, and/or the relative difference between the poverty share of impacted riders and the poverty share of similarly situated riders not directly impacted exceeds 35%.

Table 5 shows the results of the comparisons of minority shares for each payment method to the overall minority share of riders. Significant differences could result in a Disparate Impact for riders using the applicable payment method.

Table 5 Identification of Possible Disparate Impacts

Survey	Metro Bus	Metro Fare	Foothill Fare	Minority Absolute Diff.	Minority Relative Diff.	Disparate Impact			
Cash									
	81% REGULAR CASH BRDGS	\$1.75	\$1.25	-1.1%	-1.3%				
	93% ELD/DIS CASH BRDGS-Peak	\$0.75	\$0.50	-1.1%	-1.3%				
	93% ELD/DIS CASH BRDGS-Off Peak	\$0.35	\$0.50	-1.1%	-1.3%				
	97% STDNT REDUCED CASH BRDGS	\$1.00	\$1.25	-1.1%	-1.3%				
IA Xfer									
	TRANSFER (non-OCTA)	\$.50/\$.25	\$.50/\$.25	-8.8%	-9.9%				
	TRANSFER OCTA	Not Applicable							
TAP-Stored Value									
	19% REGULAR CASH BRDGS	\$1.75	A	\$1.25	B	-10.6%	-12.0%	Yes	(1)
	7% ELD/DIS CASH BRDGS-Peak	\$0.75	A	\$0.50	C	-10.6%	-12.0%	Yes	(1)
	7% ELD/DIS CASH BRDGS-Off Peak	\$0.35	A	\$0.50	C	-10.6%	-12.0%		
	3% STDNT REDUCED CASH BRDGS	\$1.00	A	\$1.25	B	-10.6%	-12.0%		
TAP-Day Pass									
	REG DAY PASS BRDGS	\$7.00		NA		0.1%	0.1%		
	ELD/DIS DAY PASS BRDGS	\$2.50		NA		0.1%	0.1%		
TAP-7-Day Pass	7 DAY PASS BRDGS	\$25.00		NA		4.4%	5.0%		
TAP-30-Day Pass									
	30 DAY PASS BRDGS	\$100.00		\$70.00	D	0.8%	0.9%		
	ELD/DIS 30 DAY PASS BRDGS	\$20.00		\$22.00	D	0.8%	0.9%		
	STUDENT PASS BRDGS	\$24.00		\$33.00	D	0.8%	0.9%		
	COLLEGE PASS BRDGS	\$43.00		\$33.00	D	0.8%	0.9%		
TAP-EZ Pass	REGIONAL PASS BRDGS	\$110/\$42		\$110/\$42		-3.0%	-3.4%		
		Note A:	Free Transfer				Note (1):	non-Xfer only	
		Note B:	\$0.50 Transfer						
		Note C:	\$0.25 Transfer						
		Note D:	31-Day Pass						

Only two of the seven fare groups exhibited significant absolute differences in minority shares from Metro's systemwide minority share – Interagency Transfers and TAP-Stored Value. No group showed a relative difference in minority shares that was significant.

The significant difference in minority share for the Interagency Transfer payment group does not result in a Disparate Impact because riders in this group would not experience a price change. For riders in the TAP-Stored Value payment group there would not be a Disparate Impact on the ELD/DIS CASH BRDGS-Off Peak or STDNT REDUCED CASH BRDGS payment methods because the price increase for these riders would have an adverse impact on riders that are significantly less minority than Metro's overall ridership. However, riders using the REGULAR CASH BRDGS and ELD/DIS CASH BRDGS-Peak payment methods could experience a price reduction if they do not transfer which would result in a benefit to a group of riders significantly less minority than Metro's overall ridership; therefore, this results in a Disparate Impact. Riders using these payment methods who transfer would not realize a price reduction and would not experience a Disparate Impact.

Table 6 shows the results of the comparisons of poverty shares for each payment method to the overall poverty share of riders. Significant differences could result in a Disproportionate Burden for riders using the applicable payment method.

Table 6 Identification of Possible Disproportionate Burdens

Survey	Metro Bus	Metro Fare	Foothill Fare	Poverty Absolute Diff.	Poverty Relative Diff.	Disproportionate Burden			
Cash									
	81% REGULAR CASH BRDGS	\$1.75	\$1.25	1.9%	3.0%				
	93% ELD/DIS CASH BRDGS-Peak	\$0.75	\$0.50	1.9%	3.0%				
	93% ELD/DIS CASH BRDGS-Off Peak	\$0.35	\$0.50	1.9%	3.0%				
	97% STDNT REDUCED CASH BRDGS	\$1.00	\$1.25	1.9%	3.0%				
IA Xfer									
	TRANSFER (non-OCTA)	\$.50/\$.25	\$.50/\$.25	-8.4%	-13.4%				
	TRANSFER OCTA	Not Applicable							
TAP-Stored Value									
	19% REGULAR CASH BRDGS	\$1.75	A	\$1.25	B	-18.5%	-29.6%	Yes	(1)
	7% ELD/DIS CASH BRDGS-Peak	\$0.75	A	\$0.50	C	-18.5%	-29.6%	Yes	(1)
	7% ELD/DIS CASH BRDGS-Off Peak	\$0.35	A	\$0.50	C	-18.5%	-29.6%		
	3% STDNT REDUCED CASH BRDGS	\$1.00	A	\$1.25	B	-18.5%	-29.6%		
TAP-Day Pass									
	REG DAY PASS BRDGS	\$7.00		NA		3.8%	6.2%		
	ELD/DIS DAY PASS BRDGS	\$2.50		NA		3.8%	6.2%		
TAP-7-Day Pass	7 DAY PASS BRDGS	\$25.00		NA		6.4%	10.3%	Yes	(2)
TAP-30-Day Pass									
	30 DAY PASS BRDGS	\$100.00		\$70.00	D	-2.2%	-3.5%		
	ELD/DIS 30 DAY PASS BRDGS	\$20.00		\$22.00	D	-2.2%	-3.5%		
	STUDENT PASS BRDGS	\$24.00		\$33.00	D	-2.2%	-3.5%		
	COLLEGE PASS BRDGS	\$43.00		\$33.00	D	-2.2%	-3.5%		
TAP-EZ Pass	REGIONAL PASS BRDGS	\$110/\$42		\$110/\$42		-14.4%	-23.1%		

Note A: Free Transfer

Note B: \$0.50 Transfer

Note C: \$0.25 Transfer

Note D: 31-Day Pass

Note (1): non-Xfer only

Note (2): more than 20 boardings in 7 days only

In this case, four of the seven payment groups exhibited significant absolute differences in their poverty shares from Metro's overall system average. No group exhibited relative share differences that were significant.

The Interagency Transfer and TAP-EZ Pass payment groups would experience no price change, so there is no Disproportionate Burden imposed upon these groups of riders. The TAP-Stored Value group has a significantly lower poverty share than Metro's overall ridership, so any benefit to members of this group would constitute a Disproportionate Burden. The ELD/DIS CASH BRDGS-Off Peak and STDNT REDUCED CASH BRDGS payment methods would experience price increases and no

Disproportionate Burden. However, the REGULAR CASH BRDGS and ELD/DIS CASH BRDGS-Peak payment methods would experience price reductions if such riders do not transfer. This would constitute a Disproportionate Burden because a benefit would accrue to a group of riders that have a significantly lower poverty share than Metro's overall ridership. If riders in these two categories were to transfer, then there would be no price reduction and no Disproportionate Burden.

Finally, the TAP-7-Day Pass group has a significantly higher poverty share than Metro's overall ridership, so an adverse impact on this group would constitute a Disproportionate Burden. Since Foothill does not offer a 7-Day Pass these riders would have to pay a cash fare each time they board. Twenty Foothill cash fares would equal Metro's 7-Day Pass price, so more than 20 base fare boardings on Foothill in a seven day period would constitute a price increase, and therefore an adverse impact on a group that has a significantly higher poverty share than Metro's overall ridership. This would be a Disproportionate Burden to these riders.

In summary, the analysis has found that there would be a Disparate Impact on Regular riders and Elderly/Disabled Peak riders who currently ride Lines 190/194 and/or Line 270 and pay their fare with a Stored Value TAP Card and do not transfer. Additionally, there would be a Disproportionate Burden imposed upon these same riders as well as on those riders who now use a Metro 7-Day Pass and board a bus more than 20 times a week.

An action which results in a Disparate Impact can still be carried out if (1) there is a substantial legitimate justification for the action, and (2) there is no alternative to the action having a lesser Disparate Impact and still accomplishing the goals of the action. In this instance the transfer of operating responsibilities from Metro to Foothill Transit saves scarce operating dollars while still providing service to the riders. There is no other mechanism for accomplishing this while maintaining current service levels. The Disproportionate Burden that results for some riders can be partially mitigated through reinvestment of cost savings into added service addressing needs elsewhere in Metro's service area.

Lines 156 & 236/237

			COMMENTS					CATEGORY			
			Email	Comment Card	Letter	Oral	Social Media	Support	Against	Modify	Other
Date	Name	Comment									
1/29/2016	Power, Max	Supports proposal.	X					1			
2/2/2016	Bonilla, Mark	Line 156 should restructure from Chandler Boulevard to Burbank Boulevard to streamline service, briefly following and servicing local stops between Commuter Express #549 stops.	X						1		
2/3/2016	Ackerman, Jason	Based on his comment he was originally against this proposal because he misunderstood what the proposal was. Israel Marin, Metro Service Planner, clarified the changes. Once he understood what the proposal is he changed his stance and supports it.				X		1			
2/3/2016	Reed, Bart	I support the proposal, but Line 236 needs to be more frequent.				X		1			
2/5/2016	Fung, Hank	Supports proposal. Will Owl Line 656 continue to be operated?	X					1		1	
2/9/2016	Nicholas, Pete	With the new proposed changes to this line (and anticipated greatly increased ridership), the line could be made much more rider-friendly for southbound and grid-pattern connections in Hollywood by further extension of the south termination of the newly modified line. With more northbound connections south of Santa Monica, connections to the valley would also be made easier. Extending the current line south just a mere 3 more blocks would make a connection to Melrose. Extending it another 4 blocks would connect to Beverly Boulevard. Extending it another 6 blocks would touch Wilshire Boulevard. Extending it another 6 blocks would complete the connection all the way to La Brea. Southbound ridership in Hollywood south of Hollywood Blvd. is currently underutilized because the line is much less convenient than it could be. The dense service area between La Brea and Vine Street, south of Santa Monica, is greatly underserved due to the (past elimination and current) lack of the southern extension.	X						1		
2/10/2016	Wright, Wayne	With the 156, you know, I would ask that it would be deferred until December, 2016. One of the reasons, possibly, is to explore having regular service -- other services take over the line east of Universal City such as either expanding Line 750, branching out Line 222 and the 223 or whatever, because it would make the line too long from Mission Hills, Granada Hills to Universal -- to Hollywood. So it's something that needs to be looked at.				X			1		
Total								4	1	2	1

Lines 234 & 734

			COMMENTS					CATEGORY			
			Email	Comment Card	Letter	Oral	Social Media	Supports	Against	Modify	Other
Date	Name	Comment									
1/29/2016	Power, Max	Supports proposal.	X					1			
2/2/2016	Bonilla, Mark	Line 734 weekdays and Line 234 weeknights late PM/early AM/weekends should change the route between Church Ln/I-405 Fwy SB ramps and Westwood Bl/Weyburn Ave: southbound would continue down Church Ln to Montana Avenue, Gayley Avenue, Le Conte Avenue, Westwood Boulevard and then regular route, while northbound likewise would take the regular route to Westwood Bl/Weyburn Avenue, and then Westwood Boulevard, Le Conte Avenue, Gayley Avenue, Veteran Avenue, Sunset Boulevard and Church Lane to I-405 Fwy SB ramps and regular route to Sylmar, briefly following Commuter Express #573 in the UCLA area, serving their stops in between. Additionally the westbound route in Downtown should be rerouted to continue up Broadway to Temple Street, Grand Avenue, Cesar Chavez Avenue and regular route.	X						1		
2/3/2016	Ackerman, Jason	I'm really excited about this proposal.				X		1			
2/3/2016	Brown, Shelly	Lines 234 & 734. Now that they go to Westwood there is nothing on Sepulveda to provide service. Former Rapid Line 761 operated 7 days a week. Why is this not still in effect? It shouldn't take 2 1/2 hours to get from Universal City to Van Nuys on a weekend. I suggest operating Line 734 on weekends to avoid the overcrowding on Line 234 and the long delays between buses. This also allows Line 234 to layover at Ventura/Sepulveda to provide service in a timely manner making transfers to other lines more efficient.			X				1		
2/3/2016	Norris, Ken	I am against the bus change because metro cannot take care of the buses and now this will make things worse.		X					1		
2/3/2016	O'Connor, Pat	Asked for clarification on proposal.				X				1	
2/3/2016	Reed, Bart	I support the proposal.				X		1			
2/3/2016	Sinha, Debdas	We need more buses and more frequent service.				X			1		
2/3/2016	Timberlake, B.	I support the extension.				X		1			
2/3/2016	Van Peer, Robert	Line 234 and 734 will duplicate each other and so ridership on both line will be diminished. Extend Line 734 only to the Sepulveda Expo Station only. In addition , Line 788 will also duplicate Lines 234 and 734.				X		1		1	
2/3/2016	Ziff, Ron	I support the extension.				X		1			
2/4/2016	Drummond, J.K.	The 234 from Sylmar being extended down to the Expo Line, that's excellent.				X		1			
2/5/2016	Fung, Hank	Coordinate with Culver City Transit to add stops at Sepulveda/Santa Monica to enable transfers to other services like Line 4/704 to Century City and SMBBB Line 1 to Santa Monica.						1		1	

Lines 234 & 734

Date	Name	Comment	COMMENTS					CATEGORY			
			Email	Comment Card	Letter	Oral	Social Media	Supports	Against	Modify	Other
2/10/2016	Wright, Wayne	With the 234, the 234, also, is another problem. The line would be too long if expanded to the Expo Sepulveda Station. I would ask that it be broken up by December of this year and that existing lines, either 230 or 292 in the Sylmar area, replace the service from Sylmar to Mission Hills College and have 234 truncate at the Sylmar Metrolink station.				X			1	1	
Total							8	2	5	2	

Line 501

			COMMENTS					CATEGORY			
			Email	Comment Card	Letter	Oral	Social Media	Supports	Against	Modify	Other
1/29/2016	Power, Max	Supports proposal.	X					1			
2/3/2016	Ackerman, Jason	I'm really excited about this proposal.				X		1			
2/3/2016	Davis, Karen	Increase the span of service of Line 501 proposal				X		1		1	
2/3/2016	m_martin48@yahoo.com	Extending the route to at least Van Nuys Blvd. So we can try to attract more riders. From areas where there are employment centers. Like the Van Nuys civic center.	X							1	
2/3/2016	Reed, Bart	I support the proposal. However, the span of service should match the Orange Line, Red Line, and the Gold Line since it is intended to bridge the gap in service as is operated today.				X		1			
2/3/2016	Van Peer, Robert	I'm grateful that you will implement this line; however, I hope it connects to Line 201 so that I can get to my church in Glendale.				X		1			1
2/3/2016	Zablen, Nate	I'm very enthusiastic about this proposal and think it will be very successful. It is a great option for us to avoid driving on congested freeway from the Valley to Burbank. Please market this new service so everyone is aware of this new service.				X		1			
2/5/2016	Fung, Hank	There is over a one mile gap in service between the 134 freeway and North Hollywood station. Consider adding stop at Lankershim/Camarillo to serve the Toluca Lake area and enable connections to Line 152 and 224 to the Universal City/Studio City area on the local bus without backtracking. Consider a stop at Olive/Alameda in Burbank to serve Burbank Studios. Pasadena gets four stops but Burbank only two and North Hollywood one, when more stops would increase accessibility while not significantly increasing travel time.	X					1		1	
2/6/2016	Diamond, Darle	Glendale will provide no service at its bus stop in Glendale. So I have a rather poor impression of interagency cooperation here.				X			1		
2/10/2016	DeFazio, Mark	I want to thank you for the new express service called the NoHo-Pasadena line. Commuter Express did not offer the right kind of service to this much used route so this is a very welcome addition. I hope that you will increase the span of service to midnight. The entertainment industry is not a 9-5 kind of business. It is not even a 9am-9pm kind of business either. I worked past 11pm very often at Warner Brothers and the only way to get to Pasadena after 9 was to take the 224 (if I remember the line # correctly) down to Hollywood, catch the Red Line to Union Station and then the Gold Line to Pasadena. That was a tedious trek late at night when you just want to get home. Please consider offering later service if this service works. There are easily 100,000 people that commute to Burbank to work daily, and they will take the bus if you offer enough service. You might not have a large capacity of people after 9pm, but if you do not offer service after 9pm these people will just drive.					X	1		1	
2/14/2016	Armstead, Chris	I'd just like to know that if the new 501 line from North Hollywood Station to Pasadena. Do I need to get closer to the campus of Pasadena City College?	X								1
2/14/2016	Urrutia, Alfredo	Route 501 is a waste of taxpayer dollars. I think the money would be better used by adding the Sylmar Metrolink bus stop for the Santa Clarita NoHo bus route. Also the 501 route is waste of time. It's easier to take the Red and Gold Line to Del Mar.	X						1		
Total							8	2	4	2	

Line 788

			COMMENTS					CATEGORY			
			Email	Comment Card	Letter	Oral	Social Media	Supports	Against	Modify	Other
Date	Name	Comment									
1/29/2016	Power, Max	Supports proposal.	X					1			
2/2/2016	Mutia, Lorenzo	While it's important to have the 788 serve UCLA, it is somewhat inefficient to have the bus backtrack in order to get to the Sepulveda Expo Line station. I would offer that serving the future Westwood / Rancho Park station makes more sense but if there isn't a place where the buses can turnaround, then Sepulveda it is. Otherwise, I hope Metro considers branching the 788 with every other bus serving either UCLA or Sepulveda station.	X							1	
2/3/2016	Ackerman, Jason	I'm really excited about this proposal.				X		1			
2/3/2016	Klein-Haas, Michelle	I support this extension. However, this line only operates during weekday peak hours only. It would be nice if this line operated all day everyday. In addition we need 24 -hour bus service over the Sepulveda Pass.				X		1			
2/3/2016	O'Connor, Pat	Asked for clarification on proposal.				X					1
2/3/2016	Reed, Bart	And the final thing is the 788. You can extend and find the revenue service hours or the length to extend south to the Expo Line, but we are concerned that people in the West L.A. area actually want to get to jobs on Ventura Boulevard jobs and the Valley without having multiple transfers and they want to get to Pacoima and Arleta. And when the service was established, they took two miles of service away from Pacoima and Arleta and they took a couple of miles of service away from Ventura Boulevard south of Oxnard Street.				X					1
2/3/2016	Sinha, Debdas	We need more buses, more frequent service, and weekend service.				X					1
2/3/2016	Timberlake, B.	This Line is not doing as well as Lines 234 and 734. I do not support the extension of Line 788, which is not doing all that well and it will only duplicate Lines 234 and 734.				X			1		
2/3/2016	Van Peer, Robert	Line 788 will also duplicate Lines 234 and 734. I suggest rerouting Line 788 to Century City instead. So if somebody wants to go to the Expo Line, they could go to the 734, and if they want to go to Century City, they can go to the 788. I think that would improve the 788 in the ridership line.				X				1	
2/3/2016	Zablen, Nate	I support this extension.				X		1			
2/3/2016	Ziff, Ron	I support the extension.				X		1			
2/5/2016	Fung, Hank	Support staff proposal.	X					1			
2/6/2016	Zablen, Nate	Please clarify whether the 788, when it goes into Westwood, will it get back on the freeway or go down Sepulveda Boulevard? I think that's very important because there is a possibility it could pick up passengers on Santa Monica.				X					1
Total								6	1	3	3