



File #:2016-0153, File Type:Policy

Agenda Number:28

**SYSTEM SAFETY, SECURITY AND OPERATIONS COMMITTEE
APRIL 14, 2016**

SUBJECT: TITLE VI & ENVIRONMENTAL JUSTICE EQUITY EVALUATIONS OF MAJOR SERVICE AND FARE CHANGES FOR JUNE 2016 SERVICE CHANGE PROGRAM

ACTION: ADOPT FINDINGS OF EVALUATIONS

RECOMMENDATION

ADOPT:

- A. the finding of no Disparate Impact and no Disproportionate Burden resulting from **proposed major service discontinuations and major new service proposals for June 2016 implementation (Attachment A)**;
- B. the finding that improving service on Line 704 to conform to the new loading standards creates a Disparate Impact but no Disproportionate Burden. The Disparate Impact is created because Line 704 serves an area significantly less minority than the county average and there is no alternative that is less discriminatory (**Attachment A**); and
- C. the finding of no Disparate Impact and no Disproportionate Burden for proposed exemption of Line 577 from express fare charge (**Attachment B**).

ISSUE

Metro's Administrative Code Section 2-50 requires an equity evaluation in accordance with Federal Transit Administration Circular 4702.1B for defined major service changes and any fare changes. These evaluations determine whether there are significant differences in the minority shares of impacted riders and systemwide riders that may indicate an adverse effect upon minority riders (Disparate Impact), and whether there are significant differences in the poverty shares of impacted riders and systemwide riders that may indicate an adverse effect upon poverty level riders (Disproportionate Burden). The thresholds of significance are Board adopted and stated in Metro's Administrative Code Section 2-50.

For major service changes a Disparate Impact may result from an absolute difference in the minority shares greater than 5% and/or a relative difference in the minority shares exceeding 20%. A Disproportionate Burden may result from an absolute difference in the poverty shares greater than 5% and/or a relative difference in the poverty shares exceeding 20%. For fare changes the

respective levels of significance are 5% and 35%.

DISCUSSION

There are 14 major service changes among those proposed for June 2016 implementation, and one action that would result in fare changes to riders. The service changes are evaluated in Attachment A. The fare changes are evaluated in Attachment B (Line 577). The assumption of service by Foothill Transit on Lines 190/194 and 270 had no findings of a Disparate Impact or Disproportionate Burden. This is because Foothill Transit has committed to retain the Metro fare structure on these lines for one year (Attachment C).

The major service changes included eight proposals to discontinue all or part of a route, six proposals to implement new or extended services, and one proposal to increase midday headways. None of these proposals was found to cause a Disproportionate Burden on poverty level populations served. However, the proposal to increase midday headways on Line 704 was found to cause a Disparate Impact on minority populations served. In the instance of a Disparate Impact, the action can proceed provided that a significant agency objective is achieved by the action, and no alternative action that would achieve the objective would result in a lesser impact. The proposed action would conform midday service on Line 704 to recently adopted Loading Standards designed to limit crowding. No alternative to adding service would accomplish this objective.

It was proposed to exempt Line 577 riders from payment of an express charge normally applicable to services with significant segments of freeway travel. No Disparate Impact or Disproportionate Burden would result from this action. Because of Board adoption of Motion 63 in February 2016, staff recommended that the affected Service Councils not approve the proposed action to reduce the fare so that service restructuring in the corridor could be studied.

DETERMINATION OF SAFETY IMPACT

The requested actions in this report will have no direct impact on the safety of Metro's employees or customers.

FINANCIAL IMPACT

The impact of these findings and all related service modifications will be reflected in the FY17 proposed budget.

Impact to Budget

All related service modifications will be funded with Federal, State, and Local funds that are eligible for Bus Operations.

ALTERNATIVES CONSIDERED

There is no alternative to conducting service and fare equity evaluations for proposed major service changes or any proposed fare changes. These actions are required both by Federal Transit

Administration Circular 4702.1B and Section 2-50 of Metro's Administrative Code.

NEXT STEPS

The adoption of the recommended findings will permit implementation of the service changes adopted by Metro's Service Councils in June 2016.

ATTACHMENTS

Attachment A - Service Equity Analysis Methodology & Results

Attachment B - Line 577 Exemption from Express Charge

Attachment C - Foothill Transit Letter of Commentment

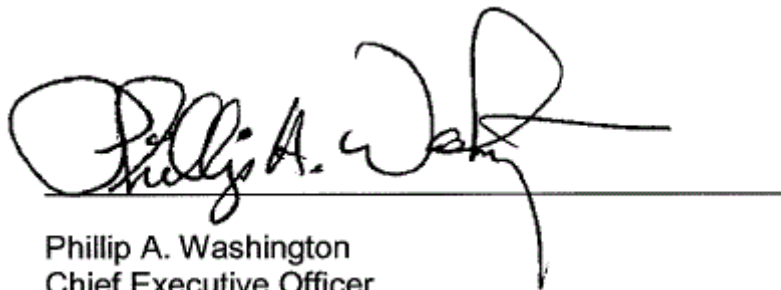
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Chief Executive Officer

ATTACHMENT A

**Service Equity Analysis
Methodology & Results**

**June 2016
Proposed Major Service Changes**

Service Planning and Scheduling
Civil Rights Programs Compliance

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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 months;

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.

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 since the improvement occurs on a line that serves an area that has significantly fewer minority residents than the county average along its route, but would not result in a disproportionate burden.

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 (reinvest in Line 111)	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 (replace with new Route 17)	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 (parts replaced by rerouted Line 258)	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

Line 577
Exemption from Express Charges

Fare Equity Analysis
Methodology & Results

Service Planning and Scheduling
Civil Rights Programs Compliance

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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 the proposed to lower the fare, the demographics of Line 577 riders will be compared with those of all express riders to determine whether some portion of minority and/or disproportionate passengers in 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 annual 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);

	MT-439	MT-442	MT-445	MT-450	MT-460	MT-485	MT-487	MT-489	MT-534	MT-550	MT-577	MT-910	
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

Table 1
Surveyed Linked Trips by Route and by Ethnicity

- 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);

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

Table 2
Surveyed Linked Trips by Route and by Household Income

- 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;

	MT-439	MT-442	MT-445	MT-450	MT-460	MT-485	MT-487	MT-489	MT-534	MT-550	MT-577	MT-910	
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 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	
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-\$69,999	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%

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

- 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.



Foothill Transit

Going Good Places

April 4, 2016

Mr. Phillip Washington
Chief Executive Officer
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

Re: Honoring Metro Fares on Lines 190/194 and 270

Dear Mr. Washington:

All of us at Foothill Transit continue to be excited about the possible transition of lines 190, 194 and 270. As part of our preparations, on Friday, April 1st, the Foothill Transit Executive Board approved honoring all Metro fare media for these three lines for a period of one year. We also will operate schedules that provide the same or additional service compared to what is operated today. This will make the transition seamless for riders and we believe that it will address the Environmental Justice concerns identified by Metro.

With your approval, we propose to enter into a MOU with Metro whereby Metro will reimburse Foothill Transit at the Foothill Transit average cash fare per boarding for riders using Metro fare media on the 190/194 and 270 lines.

Thank you for your continuing consideration of this proposal. If you have any questions about our Board's actions or any other matters related to this transition, please contact me at (626) 931-7200

We look forward to moving to the next steps in the process.

Sincerely,

Doran J. Barnes
Executive Director

Attachments

cc: Stephanie Wiggins, Deputy Chief Executive Officer
Nalini Ahuja, Executive Director, Finance

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