



Board Report

File #: 2015-1361, **File Type:** Policy

Agenda Number: 66.

REGULAR BOARD MEETING OCTOBER 22, 2015

**SUBJECT: TITLE VI AND ENVIRONMENTAL JUSTICE EQUITY EVALUATIONS FOR NEW
FIXED GUIDEWAYS**

**ACTION: APPROVE ADOPTION OF THE TITLE VI AND ENVIRONMENTAL JUSTICE EQUITY
FINDINGS FOR THE METRO GOLD AND EXPO LINES EXTENSIONS**

RECOMMENDATION

ADOPT the following **Title VI and Environmental Justice Equity Findings:**

- A. Metro Gold Line Foothill Extension to Azusa and related bus service changes which have no Disparate Impact to minority populations and the Disproportionate Burden analysis as identified in Attachment A; and
- B. Metro Expo Line Extension to Santa Monica and related bus service changes which have no Disparate Impact to minority populations and the Disproportionate Burden analysis as identified in Attachment B.

ISSUE

The Federal Transit Administration requires equity evaluations for new fixed guideway projects six months prior to revenue operation. The Metro Gold Line Foothill Extension to Azusa has no Disparate Impact to minority populations. A Disproportionate Burden to poverty level persons will result primarily as a consequence of the rail line itself, and cannot be reasonably mitigated. The rail extension will provide significant regional benefits that will outweigh and mitigate the Disproportionate Burden that results from its operation in the extension corridor.

Metro Expo Line Extension to Santa Monica has no Disparate Impact to minority populations and will impose no Disproportionate Burden on poverty populations.

DISCUSSION

Federal Transit Administration Circular 4702.1B provides requirements and guidelines for Title VI and Environmental Justice obligations of federal funds recipients. Page IV-21 of these guidelines requires that a service and fare equity evaluation be performed six months prior to the initial operation of a new fixed guideway project.

The service equity analysis must include consideration of the impacted populations for all service changes that are proposed in relation to the operation of each fixed guideway project, whether or not the changes meet the adopted definition of major change as defined in Metro's Administrative Code Section 2-50. A comparison of before and after service levels on each impacted service is also required. For these two equity evaluations there is no comparative table of service frequencies because no changes are proposed in levels of service, only routing changes.

A fare equity analysis is also required if there are any fare impacts resulting from the operation of the fixed guideway projects. There are no fare changes proposed in association with either of the two projects evaluated. The only potential fare impacts could be on cash paying riders who may be required to transfer to complete a trip that did not previously require them to do so. These riders will not be adversely impacted as they may obtain a TAP Card at any rail station, and use it to pay their fare, thereby being able to transfer at no added cost. The cost of the TAP Card is inconsequential as it is only one dollar for a card that should last for ten years.

The methodology and findings for each evaluation are detailed in Attachment A (Equity Evaluation of Metro Gold Line Foothill Extension - Pasadena to Azusa) and Attachment B (Equity Evaluation of Metro Expo Line Extension - Culver City to Santa Monica).

Findings

Metro Gold Line Extension

There is no Disparate Impact from any of the studied scenarios for the Metro Gold Line Foothill Extension and related Metro bus service changes.

There will be a Disproportionate Burden imposed on poverty level persons for either of the scenarios that retain existing Route 270 service north of Pomona Ave. The Disproportionate Burden is principally due to the low level of poverty among those persons benefitting from the Metro Gold Line Foothill Extension itself. While Scenario 2 would mitigate the overall Disproportionate Burden by withdrawing Route 270 service from Myrtle Ave. north of Pomona Ave. it is too extreme an adverse impact to persons along that portion of the route who would be left with no fixed route bus service. This is not considered to be a reasonable alternative. The significant benefits of introducing the Metro Gold Line Foothill Extension to the area outweigh the Disproportionate Burden that results.

Metro Expo Line Extension

The proposed service changes evaluated will result in no Disparate Impact to minorities, and no Disproportionate Burden to poverty level persons.

DETERMINATION OF SAFETY IMPACT

There are no safety issues associated with completing Title VI and Environmental Justice evaluations.

FINANCIAL IMPACT

The projected operating costs for these two fixed guideway projects are part of planned future year expenditures. These equity evaluations will have no impact on planned expenses.

ALTERNATIVES CONSIDERED

The completion of equity evaluations for fixed guideway projects is a Federal Transit Administration requirement for continued funding eligibility. There are no practical or economic alternatives to the performance of these analyses and the adoption of their findings.

NEXT STEPS

Approval of the findings of the equity evaluations of these two fixed guideway projects will permit staff to continue with remaining actions necessary to put these projects into revenue service.

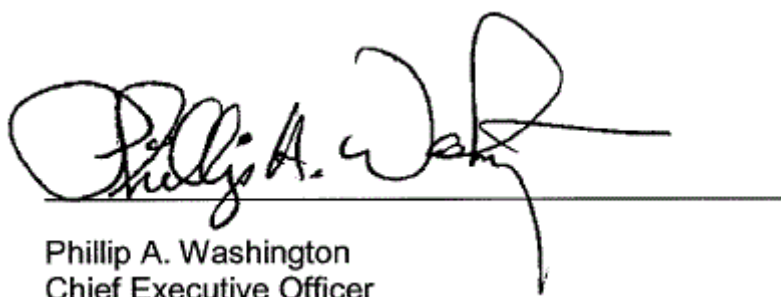
ATTACHMENTS

Attachment A - Equity Evaluation of Metro Gold Line Foothill Extension - Pasadena to
Azusa

Attachment B - Equity Evaluation of Metro Expo Line Extension - Culver City to Santa
Monica

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Phillip A. Washington
Chief Executive Officer

Attachment A

EQUITY EVALUATION METRO GOLD LINE FOOTHILL EXTENSION – PASADENA TO AZUSA

This document provides a service and fare equity evaluation for the extension of the Metro Gold Line from Sierra Madre Villa Station in Pasadena to the APU/Citrus College Station in Azusa (11.5 miles and 6 new stations). The requirement for this evaluation is provided in FTA Circular 4702.1B, excerpted in Figure 1.

Service and Fare Equity Analysis for New Starts and Other New Fixed Guideway Systems. Transit providers that have implemented or will implement a New Start, Small Start, or other new fixed guideway capital project shall conduct a service and fare equity analysis. The service and fare equity analysis will be conducted six months prior to the beginning of revenue operations, whether or not the proposed changes to existing service rise to the level of “major service change” as defined by the transit provider. All proposed changes to parallel or connecting service will be examined. If the entity that builds the project is different from the transit provider that will operate the project, the transit provider operating the project shall conduct the analysis. The service equity analysis shall include a comparative analysis of service levels pre-and post- the New Starts/Small Starts/new fixed guideway capital project. The analysis shall be depicted in tabular format and shall determine whether the service changes proposed (including both reductions and increases) due to the capital project will result in a disparate impact on minority populations. The transit provider shall also conduct a fare equity analysis for any and all fares that will change as a result of the capital project.

Figure 1

Excerpt from Page IV-21 of FTA Circular 4702.1B
TITLE VI REQUIREMENTS AND GUIDELINES

METHODOLOGY

FTA’s Title VI guidelines provide a choice of two methodologies for conduct of a service equity evaluation. The preferred method would use rider survey data to determine impacts on minority and poverty riders on impacted services. In the event that such data is not available, census demographic data may be used to evaluate impacts on minority and poverty level persons living within walking distance of impacted services. Because Metro does not have adequate rider survey data at the route level, this evaluation uses demographic data from the 2010 U. S. Census and the 2006-2010 American

Community Survey dataset. Minority data is available at the block group level, and household income data is available at the census tract level.

The service equity evaluation includes all Metro route changes, whether major or minor, proposed in conjunction with the operation of the Metro Gold Line Foothill extension. A census-based analysis is conducted because of a lack of route level rider demographics. A before and after service frequency comparison is not included because existing headways are expected to be maintained on all affected services.

The numbers of persons within walking distance of all affected bus stops (up to one quarter mile) and rail stations (up to one half mile) are categorized by minority (Title VI) and poverty household income (Environmental Justice). Persons positively (positive numbers) and adversely (negative numbers) impacted are combined to determine whether or not there is a net positive or adverse impact for all changes related to the rail operation. The minority and poverty shares of the net impacted population are compared with Metro service area averages to determine whether there are significant differences. Significance has been previously defined by the Metro Board of Directors as the smaller of a 5% absolute difference, or a 20% relative difference, from Metro's service area averages. In this instance, the smallest values are at least a 5% absolute difference in the minority share, and at least a 20% relative difference in the poverty share.

If there is a positively impacted population that is significantly less minority than Metro's service area average, or an adversely impacted population that is significantly more minority than Metro's service area average, then a finding of a Disparate Impact must be made. In order for the project to proceed, the Metro Board of Directors must find that there are overriding considerations that necessitate the project, and that there are no feasible alternatives to the project with a less negative impact on minorities.

Similarly, if there is a positively impacted population that is significantly less poverty than Metro's service area average, or an adversely impacted population that is significantly more poverty than Metro's service area average, then a finding of a Disproportionate Burden must be made. In such an instance, Metro must seek to mitigate the impacts of the proposed changes.

If there is no Disparate Impact and no Disproportionate Burden, then no further action is necessary.

There is no fare equity evaluation for this project as no fares will be impacted by the project. Persons with prepaid passes, or who use a TAP Card to pay their fare, can transfer at no added cost between Metro services. Those who do not have a TAP Card may obtain one at any of the rail stations for one dollar plus the amount of fare to be added to the card. The one dollar purchases a reusable TAP Card that should last up to 10 years, so the one dollar cost is considered inconsequential.

ANALYSIS

The Metro Gold Line Foothill Extension will extend 11.5 miles from Sierra Madre Villa Station in East Pasadena to the APU/Citrus College Station in Azusa. It will add six stations to the line (Figure 2).

Gold Line Foothill Extension Corridor Pasadena to Azusa

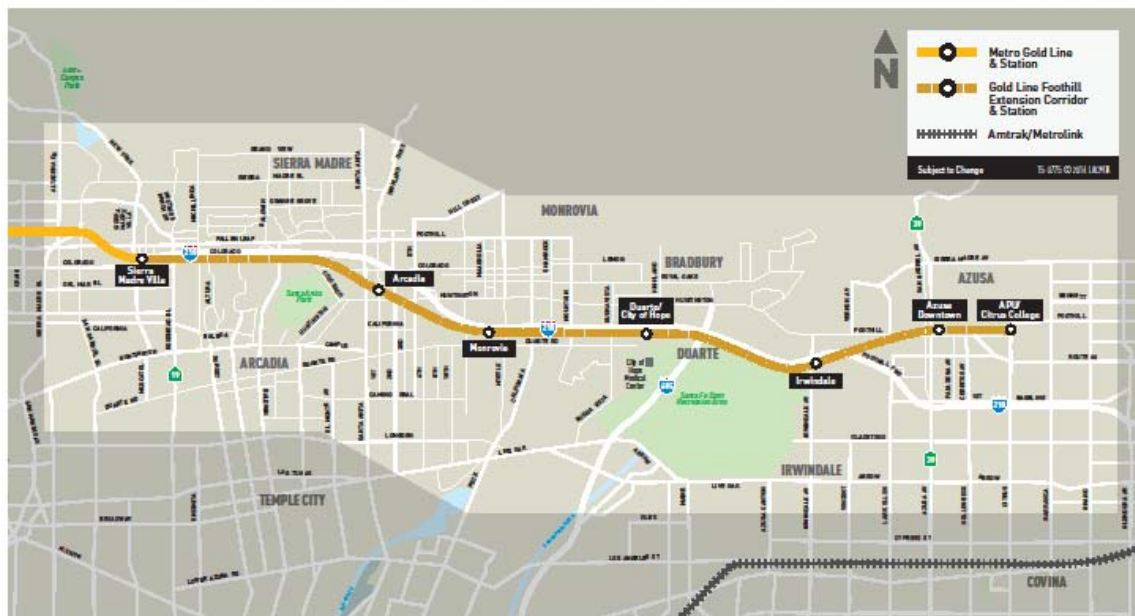


Figure 2
Metro Gold Line Foothill Extension

There are few Metro bus lines within the corridor as Foothill Transit is the primary provider within the area. There will be minor impacts to two, possibly three, Metro bus lines.

Route 79

The turn-around loop east of 1st Av. in Arcadia will be shortened to more directly serve the Arcadia Station (Figure 3). Stops at Huntington Dr./1st Av. EB, Joseph St./2nd Av. WB, Joseph St./1st Av. WB, 1st Av./Santa Clara St. SB, and Huntington Dr./1st Av. WB

will be eliminated. A new stop will be added on Santa Clara St. midblock between Santa Anita Av. and 1st Av. to more directly serve the Arcadia Station.



Figure 3
Route 79

Route 264

This route will serve the Duarte Station (Figure 4). Stops will be added at Highland Av./Duarte Rd. SB and Duarte Rd./Hope Dr. WB to serve the Duarte Station and City of Hope, respectively. Only eastbound service currently stops at Hope Dr.



Figure 4
Route 264

Route 270

There are three alternatives for this route (figure 5). The City of Monrovia is considering the introduction of a fixed route bus service which we shall call the Monrovia Connector for purposes of this analysis. There is currently only a same day general public Dial-A-Ride service offered by the city. If the City's fixed route service were to be implemented, it would be expected to serve much of the Myrtle Av. corridor now served by the northern end of Route 270.

Without the Monrovia Connector a stop would be added in the vicinity of Myrtle Av./Railroad Av. SB, and the existing route would be maintained (Scenario 1).

With the Monrovia Connector the existing route would be discontinued north of Pomona Av. entailing the discontinuation of 18 bus stops as far north as the current northern terminal at Primrose Av./Foothill Bl. The revised terminal routing via Pomona and

Primrose Aves. would add two stops on Primrose Av. south of Pomona Av. along with the Myrtle Av./Railroad Av. SB stop added under the first alternative (Scenario 2)

A third option would add the Primrose Av. loop and its two stops to the existing routing thereby retaining Metro service through downtown Monrovia as well as providing a closer station access via the Primrose Av. loop (Scenario 3) This scenario adds the three stops of Scenario 2 without removing existing service north of Pomona Av..

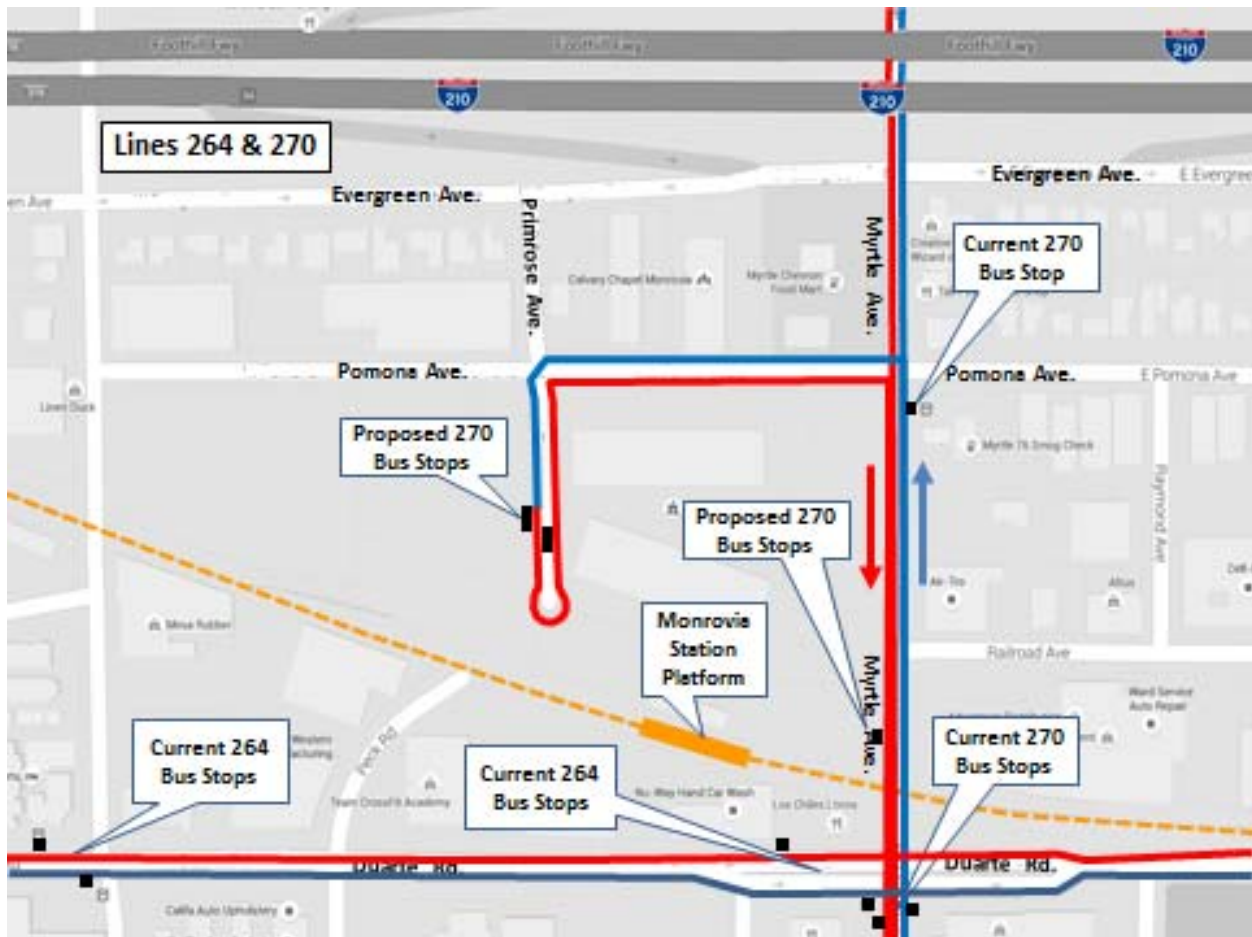


Figure 5
Route 270

ANALYSIS RESULTS

The results of the demographic analysis of the three alternative packages of changes are presented in Table 1 (no Monrovia Connector), Table 2 (with Monrovia Connector and shortened Route 270), and Table 3 (no Monrovia Connector plus Primrose Av. loop).

All scenarios result in net positively impacted populations (more persons benefit than are adversely impacted by the proposed changes). A net positively impacted population requires that the minority share of impacted persons be greater than the minority share for Metro’s service area less five percent, or 65.5%, and greater than 80% of the minority share for Metro’s service area, or 56.40%, in order not to have a Disparate Impact on minorities. For the Environmental Justice evaluation the percentage of persons below the poverty income level must exceed Metro’s service area poverty percentage less 5%, or 10.90%, and must exceed 80% of Metro’s service area poverty percentage, or 12.72%, in order not to impose a Disproportionate Burden on poverty level households.

METRO GOLD LINE -- Azusa Extension Equity Evaluation
 Scenario 1 -- No City of Monrovia Station Connector

	TITLE VI		ENVIRONMENTAL JUSTICE	
	Impacted Population	Impacted Minority Population	Impacted Population	Impacted Poverty Population
Gold Line Extension - 6 Stations	67,056	49,105	102,786	12,680
Route 79 - Discontinue Existing East of Santa Anita Av.	-10,628	-8,333	-14,655	-1,161
Route 79 - New Layover on Santa Clara St.	5,983	4,368	14,655	1,161
Route 264 - Add New WB Stops	4,575	3,615	18,042	2,257
Route 270 - Add New SB Stop	6,928	5,183	14,478	1,925
Totals	73,914	53,938	135,306	16,862
Shares of Net Impacted Population	72.97%		12.46%	
Metro System Percentages	70.50%		15.90%	
Must Exceed Metro System - 5%	65.50%		10.90%	
Must Exceed Metro System x 80%	56.40%		12.72%	

Beneficial Changes shown as Positive values Adverse Changes shown as Negative values

Table 1
 No Monrovia Connector

METRO GOLD LINE -- Azusa Extension Equity Evaluation
Scenario 2 -- With City of Monrovia Station Connector

	TITLE VI		ENVIRONMENTAL JUSTICE	
	Impacted Population	Impacted Minority Population	Impacted Population	Impacted Poverty Population
Gold Line Extension - 6 Stations	67,056	49,105	102,786	12,680
Route 79 - Discontinue Existing East of Santa Anita Av.	-10,628	-8,333	-14,655	-1,161
Route 79 - New Layover on Santa Clara St.	5,983	4,368	14,655	1,161
Route 264 - Add New WB Stops	4,575	3,615	18,042	2,257
Route 270 - Discontinue Existing North of Duarte Rd.	5,541	4,139	9,651	1,510
Route 270 - Add New Layover & Stops via Pomona Av.	7,792	5,721	18,863	2,573
Totals	80,319	58,615	149,342	19,020
Shares of Net Impacted Population	72.98%		12.74%	
Metro System Percentages	70.50%		15.90%	
Must Exceed Metro System - 5%	65.50%		10.90%	
Must Exceed Metro System x 80%	56.40%		12.72%	

Beneficial Changes shown as Positive values Adverse Changes shown as Negative values

Table 2
With Monrovia Connector and Shortened Route 270

METRO GOLD LINE -- Azusa Extension Equity Evaluation
Scenario 3 -- No City of Monrovia Station Connector w/Station Loop

	TITLE VI		ENVIRONMENTAL JUSTICE	
	Impacted Population	Impacted Minority Population	Impacted Population	Impacted Poverty Population
Gold Line Extension - 6 Stations	67,056	49,105	102,786	12,680
Route 79 - Discontinue Existing East of Santa Anita Av.	-10,628	-8,333	-14,655	-1,161
Route 79 - New Layover on Santa Clara St.	5,983	4,368	14,655	1,161
Route 264 - Add New WB Stops	4,575	3,615	18,042	2,257
Route 270 - Add 3 New Stops	8,561	6,313	18,863	2,573
Totals	75,547	55,068	139,691	17,510
Shares of Net Impacted Population	72.89%		12.53%	
Metro System Percentages	70.50%		15.90%	
Must Exceed Metro System - 5%	65.50%		10.90%	
Must Exceed Metro System x 80%	56.40%		12.72%	

Beneficial Changes shown as Positive values Adverse Changes shown as Negative values

Table 3
No Monrovia Connector Plus Primrose Av. Loop

For all scenarios the population being positively benefitted by the proposed service changes was found to be more minority than Metro's overall service area. Thus, there is no Disparate Impact from any scenario.

Because the benefitted populations in all scenarios have fewer persons below poverty than Metro's overall service area, there is the potential for a Disproportionate Burden on poverty level populations if the poverty share is too low. In fact, Scenario 1 (without the Monrovia Station Connector) and Scenario 3 (with the Primrose Av. loop) do result in a Disproportionate Burden as the 80% threshold is not achieved. Scenario 2 (with the Monrovia Station Connector and shortened Route 270) adversely impacts enough persons to raise the poverty share of the net positively impacted population above both thresholds for a Disproportionate Burden.

The Disproportionate Burden arises in two of the three scenarios because the population that benefits from the Metro Gold Line Foothill Extension has only 12.36% of the impacted population below the poverty level. It is only because Scenario 2 introduces an adverse impact to a low poverty level population that the poverty level of the net benefitting population is raised enough to avoid the Disproportionate Burden in that scenario.

FINDINGS

There is no Disparate Impact from any of the studied scenarios for the Metro Gold Line Foothill Extension and related Metro bus service changes.

There will be a Disproportionate Burden imposed on poverty level persons for either of the scenarios that retain existing Route 270 service north of Pomona Av. The Disproportionate Burden is principally due to the low level of poverty among those persons benefitting from the Metro Gold Line Foothill Extension itself. While Scenario 2 would mitigate the overall Disproportionate Burden by withdrawing Route 270 service from Myrtle Av. north of Pomona Av. it is too extreme an adverse impact to persons along that portion of the route who would be left with no fixed route bus service. This is not considered to be a reasonable alternative. The significant benefits of introducing the Metro Gold Line Foothill Extension to the area outweigh the Disproportionate Burden that results.

Attachment B

EQUITY EVALUATION METRO EXPO LINE SANTA MONICA EXTENSION

This document provides a service and fare equity evaluation for the extension of the Metro Expo Line from the Culver City Station to the Downtown Santa Monica Station (6.6 miles and 7 new stations). The requirement for this evaluation is provided in FTA Circular 4702.1B, excerpted in Figure 1.

Service and Fare Equity Analysis for New Starts and Other New Fixed Guideway Systems. Transit providers that have implemented or will implement a New Start, Small Start, or other new fixed guideway capital project shall conduct a service and fare equity analysis. The service and fare equity analysis will be conducted six months prior to the beginning of revenue operations, whether or not the proposed changes to existing service rise to the level of “major service change” as defined by the transit provider. All proposed changes to parallel or connecting service will be examined. If the entity that builds the project is different from the transit provider that will operate the project, the transit provider operating the project shall conduct the analysis. The service equity analysis shall include a comparative analysis of service levels pre-and post- the New Starts/Small Starts/new fixed guideway capital project. The analysis shall be depicted in tabular format and shall determine whether the service changes proposed (including both reductions and increases) due to the capital project will result in a disparate impact on minority populations. The transit provider shall also conduct a fare equity analysis for any and all fares that will change as a result of the capital project.

Figure 1

Excerpt from Page IV-21 of FTA Circular 4702.1B
TITLE VI REQUIREMENTS AND GUIDELINES

METHODOLOGY

FTA's Title VI guidelines provide a choice of two methodologies for conduct of a service equity evaluation. The preferred method would use rider survey data to determine impacts on minority and poverty riders on impacted services. In the event that such data is not available, census demographic data may be used to evaluate impacts on minority and poverty level persons living within walking distance of impacted services. Because Metro does not have adequate rider survey data at the route level, this evaluation uses demographic data from the 2010 U. S. Census and the 2006-2010 American

Community Survey dataset. Minority data is available at the block group level, and household income data is available at the census tract level.

The service equity evaluation includes all Metro route changes, whether major or minor, proposed in conjunction with the operation of the Metro Expo Line Santa Monica extension. A census-based analysis is conducted because of a lack of route level rider demographics. A before and after service frequency comparison is not included because existing headways are expected to be maintained on all affected services.

The numbers of persons within walking distance of all affected bus stops (up to one quarter mile) and rail stations (up to one half mile) are categorized by minority (Title VI) and poverty household income (Environmental Justice). Persons positively (positive numbers) and adversely (negative numbers) impacted are combined to determine whether or not there is a net positive or adverse impact for all changes related to the rail operation. The minority and poverty shares of the net impacted population are compared with Metro service area averages to determine whether there are significant differences. Significance has been previously defined by the Metro Board of Directors as the smaller of a 5% absolute difference, or a 20% relative difference, from Metro's service area averages. In this instance, the smallest values are at least a 5% absolute difference in the minority share, and at least a 20% relative difference in the poverty share.

If there is a positively impacted population that is significantly less minority than Metro's service area average, or an adversely impacted population that is significantly more minority than Metro's service area average, then a finding of a Disparate Impact must be made. In order for the project to proceed, the Metro Board of Directors must find that there are overriding considerations that necessitate the project, and that there are no feasible alternatives to the project with a less negative impact on minorities.

Similarly, if there is a positively impacted population that is significantly less poverty than Metro's service area average, or an adversely impacted population that is significantly more poverty than Metro's service area average, then a finding of a Disproportionate Burden must be made. In such an instance, Metro must seek to mitigate the impacts of the proposed changes.

If there is no Disparate Impact and no Disproportionate Burden, then no further action is necessary.

There is no fare equity evaluation for this project as no fares will be impacted by the project. Persons with prepaid passes, or who use a TAP Card to pay their fare, can transfer at no added cost between Metro services. Those who do not have a TAP Card may obtain one at any of the rail stations for one dollar plus the amount of fare to be added to the card. The one dollar purchases a reusable TAP Card that should last up to 10 years, so the one dollar cost is considered inconsequential.

ANALYSIS

The Metro Expo Line Santa Monica Extension will extend 6.6 miles from the Culver City Station to the Downtown Santa Monica Station. It will add seven stations to the line (Figure 2). There are three Metro bus lines proposed to be modified in conjunction with the operation of this rail line.



Figure 2
Metro Expo Line Santa Monica Extension

Route 534

Service will be discontinued between 5th St. in Santa Monica and the eastern end of the line at Washington Fairfax Terminal (about 7.5 miles). A total of 14 bus stops will be eliminated (7 in each direction). The line's new eastern terminal in Santa Monica will be near the Expo Line Downtown Santa Monica Station (Figure 3).

Line 534 - Discontinue Service between Washington/Fairfax Transit Hub and Downtown Santa Monica

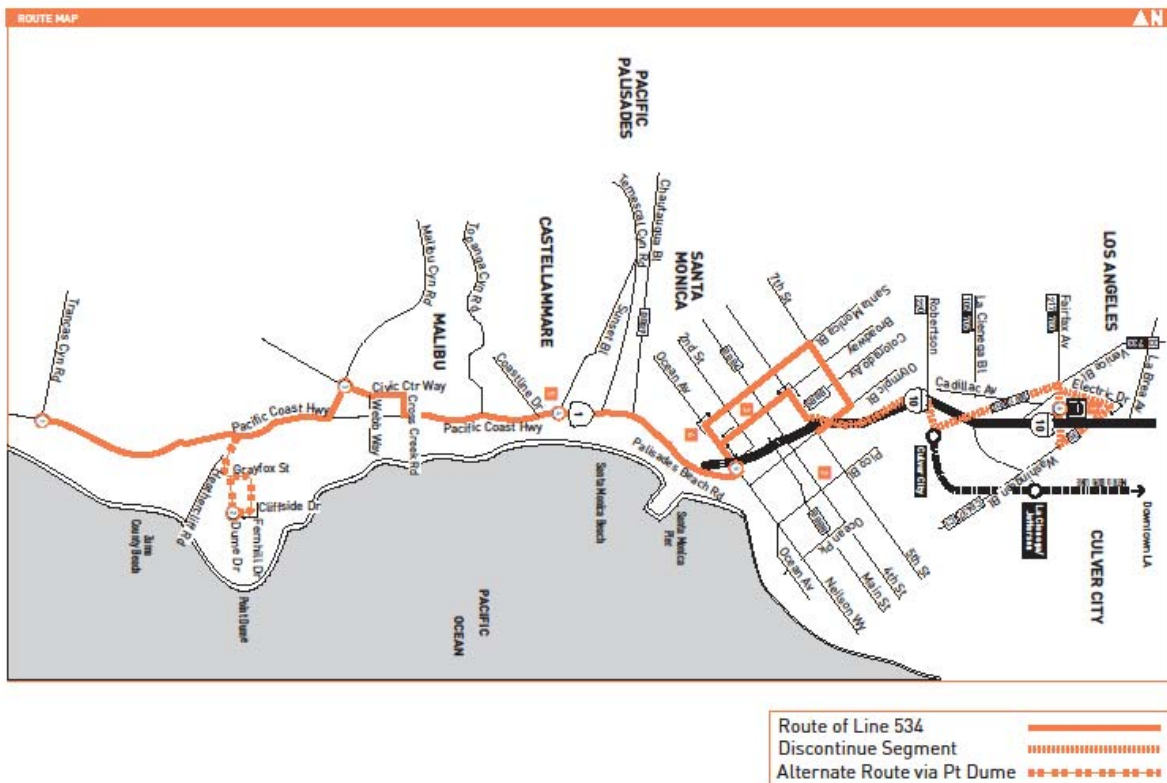


Figure 3
Route 534

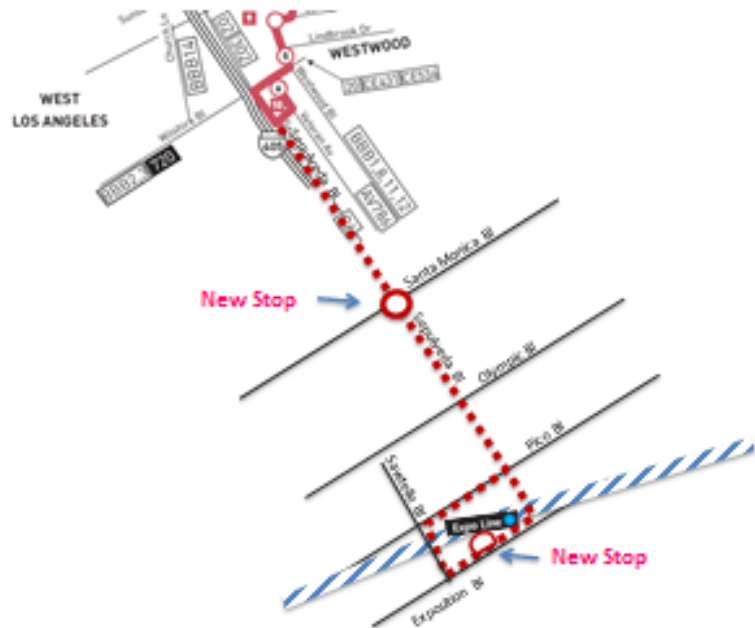
Routes 734 & 234

Rapid route 734 provides weekday service via Sepulveda Bl. between the San Fernando Valley and Westwood. Local route 234 operates only within the San Fernando Valley when Route 734 is in operation, and operates to Westwood during early morning, late evening and weekend hours. The Westwood operation of these routes would be extended via Sepulveda Bl. to the Expo/Sepulveda Station (Figure 4). Stops would be added in both directions at Sepulveda/Santa Monica Bls. In addition to the Expo Station stop.

734 Extension

734 Future Extension (234 late night, early morning, weekends)

- Bi-directional stop at Santa Monica.
- Stop and LO at Sepulveda Expo Station.



1

Figure 4
Routes 734 & 234

Route 788

Express route 788 provides peak only weekday service between the San Fernando Valley and Westwood. This service would be extended via Sepulveda Bl. to the Expo/Sepulveda Station (Figure 5). Stops would be added in both directions at Sepulveda/Santa Monica Bls. In addition to the Expo Station stop.

788 Extension

788 Future Extension

- Bi-directional stop at Santa Monica.
- Stop and LO at Sepulveda Expo Station.



2

Figure 5
Route 788

ANALYSIS RESULTS

The results of the demographic analysis of the proposed changes are presented in Table 1.

The evaluation shows net positively impacted populations (more persons benefit than are adversely impacted by the proposed changes). A net positively impacted population requires that the minority share of impacted persons be greater than the minority share for Metro's service area less five percent, or 65.5%, and greater than 80% of the minority share for Metro's service area, or 56.40%, in order not to have a Disparate Impact on minorities. For the Environmental Justice evaluation the percentage of persons below the poverty income level must exceed Metro's service area poverty percentage less 5%, or 10.90%, and must exceed 80% of Metro's service area poverty percentage, or 12.72%, in order not to impose a Disproportionate Burden on poverty level households.

METRO EXPO LINE -- Santa Monica Extension Equity Evaluation

	TITLE VI		ENVIRONMENTAL JUSTICE	
	Impacted Population	Impacted Minority Population	Impacted Population	Impacted Poverty Population
Expo Line Extension - 7 Stations	45,310	37,893	117,009	16,095
Route 534 - Discontinue	-35,194	-21,401	-62,074	-9,522
Route 534 - New	6,488	1,704	9,860	1,655
Routes 734/234 & 788 - Add Extension via Sepulveda Bl.	18,505	7,699	27,643	4,039
Totals	35,109	25,895	92,438	12,267
Shares of Net Impacted Population		73.76%		13.27%
Metro System Percentages		70.50%		15.90%
Must Exceed Metro System - 5%		65.50%		10.90%
Must Exceed Metro System x 80%		56.40%		12.72%

Beneficial Changes shown as Positive values Adverse Changes shown as Negative values

Table 1
Demographic Analysis

The analysis shows that the minority share of persons receiving a net benefit from the proposed service changes (73.76%) is greater than the thresholds for a Disparate Impact (56.40% and 65.50%). There is no Disparate Impact from these proposed service changes.

The Environmental Justice evaluation shows a net positive benefitting population, as well. The share of this population that falls below the poverty level (13.27%) is greater than the minimum thresholds to avoid a Disproportionate Burden (10.90% and 12.72%), so there is no Disproportionate Burden.

FINDINGS

The proposed service changes evaluated will result in no Disparate Impact to minorities, and no Disproportionate Burden to poverty level persons.



Title VI and Environmental Justice Equity Evaluations For New Fixed Guideways



Metro

Regular Board Meeting

October 22, 2015

Exposition Transit Corridor Phase 2

- 6.6 Mile Extension
- 7 Stations
- 43,600 Daily Boardings by 2020

Design Headway	Peak: 5'
Maintenance Facility	Address: 1955 Centinela Ave, Santa Monica, CA 90404 Capacity: 48 Vehicles



Gold Line Foothill Extension Phase 2A

- 11.5 Mile Extension
- 6 Stations
- 69,300 Daily Boardings by 2025

Design Headway	Peak: 5'
Maintenance Facility	Address: 1600 S. California, Monrovia, CA 91016 Capacity: 84 Vehicles



Metro

Title VI Background

- It is a Federal requirement to conduct a service and fare equity analysis of any new fixed guideway project six months prior to opening.
- This requirement was a new obligation included in revised FTA guidelines issued two years ago.



Report Overview

- **Demographic Analysis of impacted minority and poverty populations in two fixed guideway corridors – Expo Phase 2 and Gold Line Phase 2a.**
- **A set of findings for Board action based on the results of the analysis.**

Definitions

- **Title VI Disparate Impact:**
 - A finding that the impacted minority population for a beneficial project was significantly less than Metro's service area minority population.
- **Environment Justice - Disproportionate Burden:**
 - A finding that the impacted poverty population for a beneficial project was significantly less than Metro's service area poverty population.



Adopt Findings

- **Disparate Impact:**
 - No Impact for Expo or Gold Lines
- **Disproportionate Burden:**
 - No Impact for Expo
 - The Gold Line Extension was found to create disproportionate burden on poverty level persons, e.g. there are a lower number of poverty level residents living along the right-of-way than currently in Metro's service area.
 - Staff studied three alternatives. The only alternative that mitigated the disproportionate burden was unreasonable.



Alternative Studied – Cancel Line 270 North of of Monrovia Station

Mitigation

- Cancellation of line 270 North of the Monrovia Station.
- Negatively affect 350 boardings each weekday.
- New patrons using the Gold Line would lose access to destinations north of the station.

