



Board Report

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Agenda Number: 25.

EXECUTIVE MANAGEMENT COMMITTEE
MARCH 17, 2022

SUBJECT: CRENSHAW AND REGIONAL CONNECTOR RAIL PROJECTS TITLE VI SERVICE
AND FARE EQUITY ANALYSIS

ACTION: APPROVAL

RECOMMENDATION

APPROVE the Crenshaw and Regional Connector Operating Plans Title VI Service and Fare Equity Analysis.

ISSUE

Title VI of the Civil Rights Act of 1964 states, "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

As a recipient of federal funding, LA Metro is required by the Federal Transit Administration (FTA) to ensure its programs and activities are conducted consistent with the intent of Title VI. The Crenshaw and Regional Connector rail projects are new rail alignments involving federal funding expected to begin operation in 2022. Consistent with Federal Transit Administration Title VI guidelines and Metro's Title VI Plan, a Service and Fare Equity (SAFE) Analysis of the impacts of service on these two new lines on minority populations is required six months ahead of the start of revenue service.

BACKGROUND

Crenshaw Rail Project:

The Crenshaw Rail Project is an 8.5-mile extension of C Line (Green) light rail from Aviation/Imperial to the Exposition Line at Exposition/Crenshaw (Figure 1), including eight new stations as well as a new Airport Metro Connector station that will provide a direct connector to the new LAX airport people mover system. The Crenshaw Line will be integrated with C Line (Green) operations consistent with the Metro Board adopted Operating Plan.

Figure 1 - Crenshaw Rail Project



Due to the construction of the Airport Metro Connector station, the Crenshaw rail service will be opened in three stages:

- 1) 2022: Westchester/Veterans - Expo/Crenshaw (7 stations); bus bridge Westchester/Veterans station and Aviation/LAX station on the C Line (Green).
- 2) Late 2023: Implement Board 2018 Motion; Full Crenshaw Rail service, integrated with the C Line (Green), with two services:
 - a. Norwalk C Line (Green) - Expo Crenshaw station
 - b. Willowbrook/Rosa Parks C Line (Green) - Redondo Beach C Line (Green)
- 3) Late 2024: Same service patterns as for Phase 2 above with the addition of the Airport Metro Connector station.

Service frequencies in all phases above, up to 6-minute peak, 12- minute midday and weekends, 20-minute evenings, consistent with the rest of the Metro light rail network.

Regional Connector Rail Project:

The Regional Connector Rail Project is a 1.9-mile underground light-rail system with three new stations, connecting Metro Gold Line to 7th Street/Metro Center Station.

Once operations commence, A Line (Blue), E Line (Expo) and L Line (Gold) operations will be reconfigured from 3-line operation to a Board approved 2-line regional operation:

- A Line (Long Beach - Azusa)
- E Line (Santa Monica - Eastside)

Figure 1 - Regional Connector Rail Project



Peak service on both the A Line and E Line will be 6-minute, with 12-minute midday and weekend and 20 min evenings, consistent with the rest of the Metro light rail network.

Summary:

There is no loss of rail service levels with either the new Crenshaw nor Regional Connector rail services. Fares for the reconfigured light rail services will be the same as for other Metro rail and bus services. There will be no bus service changes being made due to either of these new rail services.

DISCUSSION

Metro's Title VI Program, which was updated and approved by Metro's Board in October 2019, requires two analyses to be completed for each new rail line. The SAFE analysis is the second requirement by Title VI presented in this report. The analysis and results represent the service operating plan and fare related impacts from these two projects. The results provide data that will show the impact of minority populations and low-income households by these projects. The impact is measured by Disparate Impact and Disproportionate Burden. The terms Disparate Impact and Disproportionate Burden reflect that notably larger than system average minority population or low-income households are served by or impacted by these projects. Metro used our Title VI Plan as a greater than 5% difference from the system average to measure these impacts.

Disparate Impact

A disparate impact will be deemed to have occurred if the absolute difference between the percentage of minority population served by the new lines and the overall percentage of minority riders in the Metro service area is at least five percent.

Disproportionate Burden

Based on 200% of the Federal Poverty Level in 2019 for a three-person household, Metro defines low-income riders at \$41,500 or less annual household income in the Metro service area of Los Angeles County. A disproportionate burden will be deemed to exist if an absolute difference between the percentage of low-income households served by the new lines and the overall percentage of low-income households in the Metro service area is at least five percent.

A finding of a disparate impact on a minority community requires Metro to evaluate alternatives and mitigate burdens where practicable.

Crenshaw Rail Service Plan Title VI Service and Fare Equity Analysis:

As required under Title VI, Metro has reviewed the minority and low-income populations that will be served by the new Crenshaw rail line based 0.5-mile catchments around the new line. The relevant data is shown in Table 1 below.

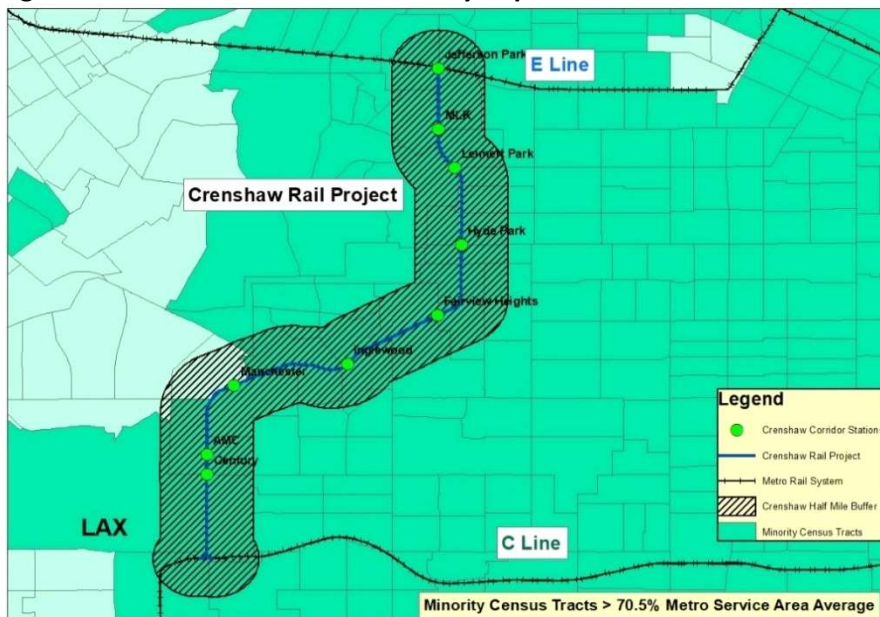
Table 1

	Population	Minority Population	Minority Percent	Households	Low Income Households	Low Income Household Percent
Crenshaw Rail Project	177,720	159,028	89.5%	68,026	30,375	44.7%
Metro Service Area	9,417,605	6,634,742	70.5%	3,176,713	1,089,941	34.3%
Difference Comparison			19.0%			10.3%

Note: The Metro Service Area information is from the October 2019 Title VI Update Report to the Metro Board. The source of data is 2017 American Community Survey.

The minority population served by the new Crenshaw rail service (see Figure 2) comprises 89.5 percent of the overall population the new line will serve, which is 19 percent higher than the 70.5 percent average for Metro’s overall service area. However, the project is a benefit to both the corridor and the minority population the new line will serve. Therefore, by adding a new rail service and not reducing other rail or bus services, the disparate impact is positive for the minority population and does not require any review of alternative options for mitigation.

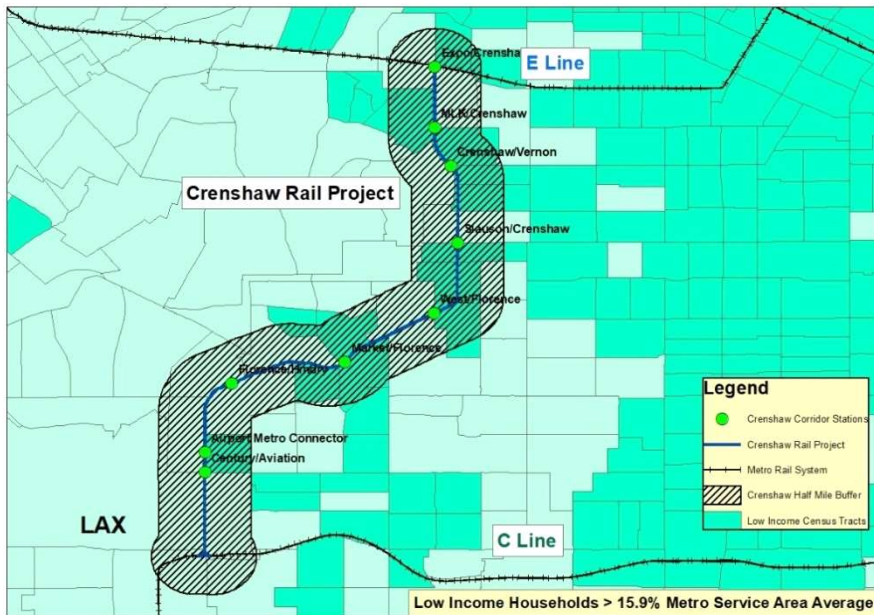
Figure 2 - Crenshaw Rail Line - Minority Population



The Low-income households served by the new Crenshaw rail service (see Figure 3) comprise 44.7 percent of the households. This is 10.3 percent higher than the Metro Service Area average of 34.3% for low-income households. However, the project is a new rail line that will provide beneficial new transit service for the corridor minority population and low-income households. Therefore, the disproportionate burden is positive for the low-income population and does not require any review of

alternative options for mitigation.

Figure 3 - Crenshaw Rail Line - Low Income Population



Regional Connector Rail Service Plan Title VI Service and Fare Equity Analysis:

As required under Title VI, Metro has reviewed the minority and low-income populations that will be served by the new Regional Connector rail line based on being within 0.5 miles of the alignment. The relevant data is shown in Table 2 below.

Table 2

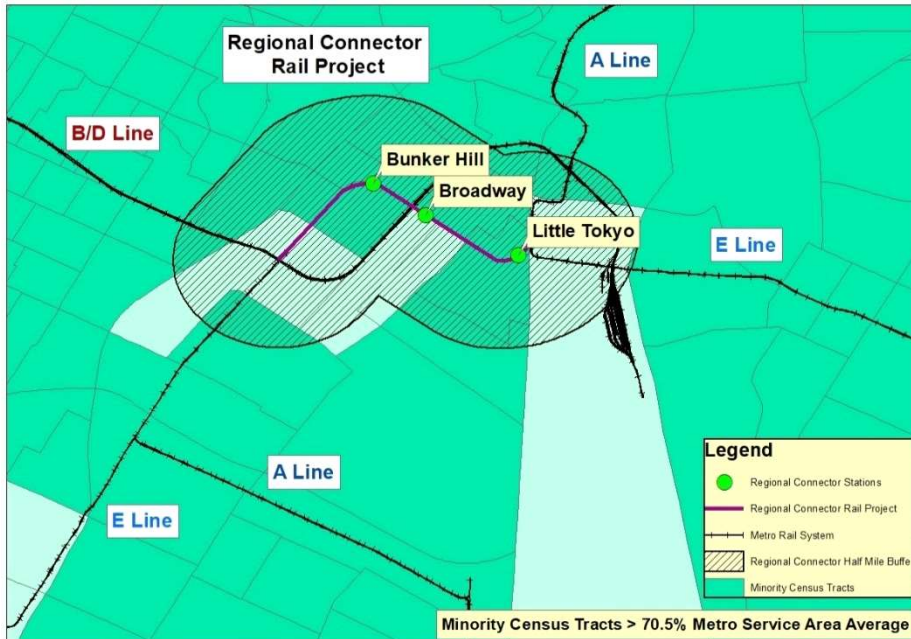
	Population	Minority Population	Minority Percent	Households	Low Income Households	Low Income Household Percent
Regional Connector Rail Project	88,478	64,918	80.7%	37,922	20,375	53.7%
Metro Service Area	9,417,605	6,634,742	70.5%	3,176,713	1,089,941	34.3%
Difference Comparison			10.2%			19.4%

Note: The Metro Service Area information is from the October 2019 Title VI Update Report to the Metro Board. The source of the data is the 2017 American Community Survey.

The minority population served by the new Regional Connector Stations (see Figure 4, 0.5-mile catchment) will comprise 80.7 percent of the overall population the new line will serve, 10.2 percent

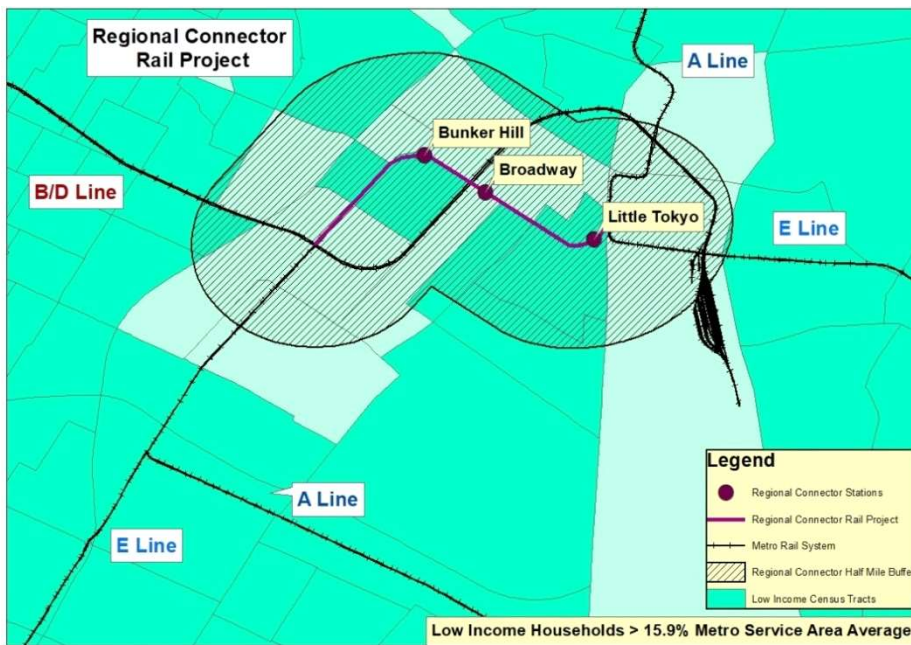
higher than the 70.5 percent average for Metro’s overall service area. However, the project benefits both the corridor and the minority population the new line will serve. Therefore, the disparate impact is positive for the minority population and does not require any review of alternative options for mitigation.

Figure 4 - Regional Connector Rail Line - Minority Population



The Low-income households that will be served by the new Regional Connector Stations (see Figure 5, 0.5-mile catchment) comprise 53.7 percent of the households. This is 19.4 percent higher than the Metro Service Area average of 34.3% for low-income households. However, the project is a benefit to both the corridor and the low-income households the line will serve. Therefore, the disproportionate burden is positive for the low-income population and does not require any review of alternative options for mitigation.

Figure 5 - Regional Connector Rail Line - Low Income Population



Conclusion:

The Service Equity Analysis shows that both Minority and Low-Income populations are impacted based on Metro’s threshold of at least 5%, which both exceed. However, the new Crenshaw and Regional Connector rail service each add service to the network and provide new high quality mobility options, benefiting minority populations and low-income households that these new corridors will serve.

Both projects add service to the network, hence the term “benefits”. Metro will not reduce bus or other rail service to implement these two new rail lines. Both projects follow the established Metro systemwide fare structures. As a result, Metro concludes any disparate impact or disproportionate burden under Title VI are positive and will not require mitigation.

Metro followed requirements of FTA Circular 4702.1B and met the legal test for disparate impact as follows:

- (1) Metro has a substantial legitimate justification for the proposed service changes as it works to expand access to high quality rail service and facilities across the Metro service area; and (2) Metro has no alternatives that would have a less disparate impact on minority riders but would still accomplish the transit provider’s legitimate program goals with the opening of Crenshaw and Regional Connector rail services. Staff is therefore requesting the Metro Board adopt this analysis in support of the impending introduction of Crenshaw and Regional Connector rail service.

Metro conducted public hearings virtually at 10 am Saturday February 12, and 6 pm Tuesday February 15, 2022, to present the Title VI Service and Fare Equity Analysis and receive public comment. A summary of comments received is included as Attachment A to this report.

The notice of intent to hold these public hearings was published in the following publications:

- Asian Journal (LA.)
- Korea Times
- La Opinión
- Los Angeles Sentinel
- Press Telegram
- Pasadena Star News
- Rafu Shimpo (Japanese)
- San Gabriel Valley Tribune
- Southwest Wave
- South Bay Daily Breeze
- Watts Times
- World Journal (Chinese Daily News)

Information regarding the proceedings was also shared via public announcements at the January and February Metro Regional Service Council meetings, posts on Nextdoor and Metro's blog, The Source, eblasts to Service Council stakeholders and project stakeholders, and take one brochures distributed aboard Metro buses.

FINANCIAL IMPACT

The results of this Title VI analysis for the Crenshaw and Regional Connector rail service plans does not alter and element of these projects in terms of facilities or services planned to operate when revenue service begins.

Impact to Budget

There is no impact to the approved Metro FY22 budget. The introduction of revenue service on these two new rail lines will be included in the Metro FY23 budget request and that request will not change as a result of this analysis.

EQUITY PLATFORM

The Title VI Service and Fare Equity Analysis is required to consider the impact of the future service plans for the Crenshaw and Regional Connector rail lines on minority and low-income communities. A separate Title VI analysis was conducted in project development to assess and address design, construction, and property impacts from these two projects. This analysis only addresses service and fare equity.

The analysis concludes that these projects impact a larger number of minority populations and low-income households than system average. However, the project impacts are benefits in the form of new high-quality transit service for the communities they will serve, with no loss in other transit service or options, and at the same affordability levels as other Metro transit services.

IMPLEMENTATION OF STRATEGIC PLAN GOALS

The recommendation supports strategic plan goal #1: Provide high quality mobility options that enable people to spend less time traveling. The service changes also respond to the sub-goal of investing in a world class bus system that is reliable, convenient, safe, and attractive to more users for more trips.

NEXT STEPS

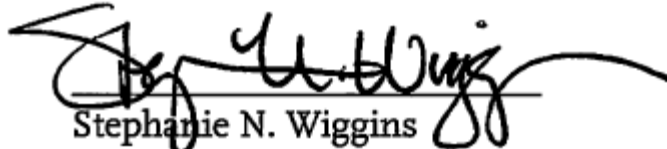
This analysis once adopted completes the requirement for a Title VI Service and Fare Equity Analysis at least six months in advance of revenue service commencing for the Crenshaw and Regional Connector rail lines which are expected to open later in 2022.

ATTACHMENTS

Attachment A - Public Hearing Comments

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Stephanie N. Wiggins
Chief Executive Officer

**Attachment A - Public Comments received on Title VI Analyses of
Crenshaw Light Rail Project and Regional Connector Transit Project Service Plans**

Committer Name	Comment	Date Received	Method of Submission	Agency Response
Mark R. Johnston	<p>1/ Long Beach to Azusa or Pomona and especially Montclair is WAY too long of a line to function with any kind of on time performance. Should be Long Beach to East LA (for now). And Santa Monica to Azusa. Now if you were to send the Blue Line up Alameda instead of the WSAB, then maybe that works by cutting some time and distance off. Or you can try alternating trains, but will you right a tight enough operations plan to make that happen(?)</p> <p>2/ Crenshaw South Bay line issue is not right either. Part of the issue in my opinion is because you chose to put a very poorly placed Bike Path on METRO OWNED right of way along Slauson, We have so few good corridors and this was wasted on a bike-walk path that will basically be inhabited by trash, homeless etc. Your Redondo Beach (and someday Torrance) line should have been thru routed thru LAX and Inglewood and then out the Slauson ROW to the Blue and WSAB station in South Gate. Crenshaw is ok from Norwalk/605 to Exposition Blvd and eventual Wilshire and Hollywood. This would have created 4 directional service to the LAX Rail Station/People Mover connection. We need to start thinking outside the box and further ahead when piecing and connecting lines- we still do a very poor job at junctions and connection points. Thank you.</p>	2/11/2022	Email to servicechanges@Metro.net	<p>Rail schedules will be designed for reliable operations.</p> <p>The West Santa Ana Branch has adopted a preferred alignment that includes the east side of downtown LA to Union Station.</p> <p>Thanks for the suggestion for a Slauson rail corridor. There is no rail project proposed for that corridor at this time.</p>
Brenda Ashby	Crenshaw Manor the neighborhood in which I live is located in direct proximity to the Crenshaw/LAX Line. The opening will provide much-needed transportation to many along its path. The completion of the Title VI Analysis will ensure the minority populations and others impacted by this 8.5 project that is being conducted consistent with FTA guidelines. I am looking forward to the completion of the Title VI Analysis.	2/12/2022	eComment	Metro also looks forward to opening the Crenshaw/LAX Line in 2022 once construction, testing, and training are completed.
Jose Dennis Alabaso	It's still okay, but I'm concerned about the proposed completion for both the Metro K (Crenshaw) Line and the Regional Connector Projects. First, they all knew that the Metro K (Crenshaw) Line is still 98% complete	2/12/2022	eComment	Metro looks forward to opening the Crenshaw/LAX and Regional Connector

Commenter Name	Comment	Date Received	Method of Submission	Agency Response
	<p>and it looks like the Los Angeles Regional Connector is about to be completed sometime the Fall of this year (2022). My other main concern is the extension for the South Bay Metro C (Green) Line that should add with the Redondo Beach/South Bay Galleria Transit Center and of course the proposed Torrance Transportation Center which will open on or before 2030. Are there any possible way to help speed up the processes?</p>			<p>Lines in 2022 once construction, testing, and training are completed for both projects. Comments relating to the Green Line Torrance Extension Project will be shared with that project team.</p>
Peter Wei	<p>With the current service plan, I'm seriously concerned that the section between Willowbrook/Rosa Parks station and Aviation/Imperial station will become a bottleneck for future LAX service increase demands. After the Airport Metro Connector (AMC) begins operation in 2024, the Crenshaw/LAX line will become one of the main ground transportation options for LAX. A frequency of 20 minutes during evening/late night is not enough to serve one of the busiest airports in the world. Even the 12 minute off peak and weekend service is not enough once the LAX ridership picks up.</p>	2/15/2022	eComment	<p>Simulations suggest the proposed operating plan can be operated reliably through the junction west of Imperial/LAX Station.</p> <p>Rail frequencies are set systemwide but can be adjusted based on ridership levels on each line.</p>
Wayne Wright	<p>My comments for the two upcoming projects...</p> <p>LAX/Crenshaw Line (K Line) Have no issues with what Metro will open up with, would like South Bay & Westside service development to look hard again on the bus routes that Metro will be serving the K Line in the future, as well as the municipals that want to connect with the K Line .</p> <p>Would like to see two shuttles between Westchester Veterans Station & the existing Aviation C Line Station....</p>	2/15/2022	Email to servicechanges@Metro.net	<p>Metro will be working with LAWA to ensure an efficient connection is available to LAX shuttles and the LAX People Mover once it opens if that occurs prior to the opening of the Airport Metro Connector Station. Metro does not operate bus service into the LAX terminals due to the congestion and not wanting to</p>

Commenter Name	Comment	Date Received	Method of Submission	Agency Response
	<p>Shuttle one: which would operate direct from Westchester Veterans K Line station to Aviation C Line Station, via Aviation Bl</p> <p>Shuttle two: which can be operated by LAX to operate from Westchester Veterans K Line Station to central terminal area of LAX, that would operate via Aviation, Arbor Vitae, Airport, to 96th St, to 96th St bridge to central terminal area, or use Century Blvd. from Aviation.</p> <p>Reason: is by going all the way to Aviation C Line Station, passengers would have to go all the way to that Station to catch G Line LAX shuttle, which would be time consuming & out of the way, the shuttle from Westchester Veterans K Line Station to LAX central terminal area is better & direct if LAX would provide the shuttle.</p> <p>Regional Connector: two of the 3 proposed stations I have concerns for & they are...</p> <p>Bunker Hill: existing Foothill Transit commuter busses & Big Blue Bus Rapid 10 & LADOT DASH cover by the Bunker Hill Station, would like to see Metro routes like the 53, 55, 60 & other Metro lines if possible, to serve the future Bunker Hill Station.</p> <p>2nd & Broadway: since proposed station is already covered by numerous Metro routes & municipal routes, I have no comments for future 2nd & Broadway Station.</p> <p>&...last Little Tokyo Station: would like to see not only LADOT DASH & Metro 30 line serve the little Tokyo Station, but want G-Trans 1x to serve that station as well & maybe Montebello bus lines? & some Metro routes close to the little Tokyo Station also.</p>			<p>duplicate LAWA shuttle bus services.</p> <p>Metro will review options to bring some bus lines closer to the new station at Bunker Hill, subject to provision of necessary bus stops which is under consideration with City of LA.</p> <p>The new station at Little Tokyo will be served by both Metro and DASH bus lines. Other municipal bus lines may also opt to serve this station.</p> <p>Rail operating hours are established systemwide. There are no plans to extend service beyond the current 12 midnight last trips.</p>

Commenter Name	Comment	Date Received	Method of Submission	Agency Response
	<p>Would like trains to operate till nearly 1 or 2 am on the A & E Line & separate on the K Line also when K Line & Connector opens.</p> <p>Thank you...</p>			
Faramarz Nabavi	<p>I wanted to express my concern about the proposed operational plan for the K Line and G Line. believe the original staff proposal would have been better, and I'm concerned that because of some elected officials in the South Bay, in a more affluent area that is not subject to the same type of Title VI concerns that affect the Crenshaw Corridor and also the existing G Line corridor east of the airport station's -- Aviation Station, that the operational plan that Metro is currently pursuing is going to unduly reduce the amount of service to people who are supposed to be protected under Title VI. I believe the original staff proposal would have been better, and I'm concerned that because of some elected officials in the South Bay, in a more affluent area that is not subject to the same type of Title VI concerns that affect the Crenshaw Corridor and also the existing G Line corridor east of the airport station's -- Aviation Station, that the operational plan that Metro is currently pursuing is going to unduly reduce the amount of service to people who are supposed to be protected under Title VI. And so I would urge staff to present to the board, based on the additional analysis they've done, the pros and cons of going back to the original staff proposal based on the Title VI analysis. I don't believe that the current proposal, which was driven by the board, meets the Title VI requirements of being better than what staff had originally proposed. So I respectfully request the implementation of the original plan. Thank you.</p>	2/15/2022	Phone	<p>Metro Board adopted Operating Plan for Crenshaw LAX rail service does not reduce service levels at any existing station. A Title VI analysis is required for any operating plan for a new rail line.</p>