

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

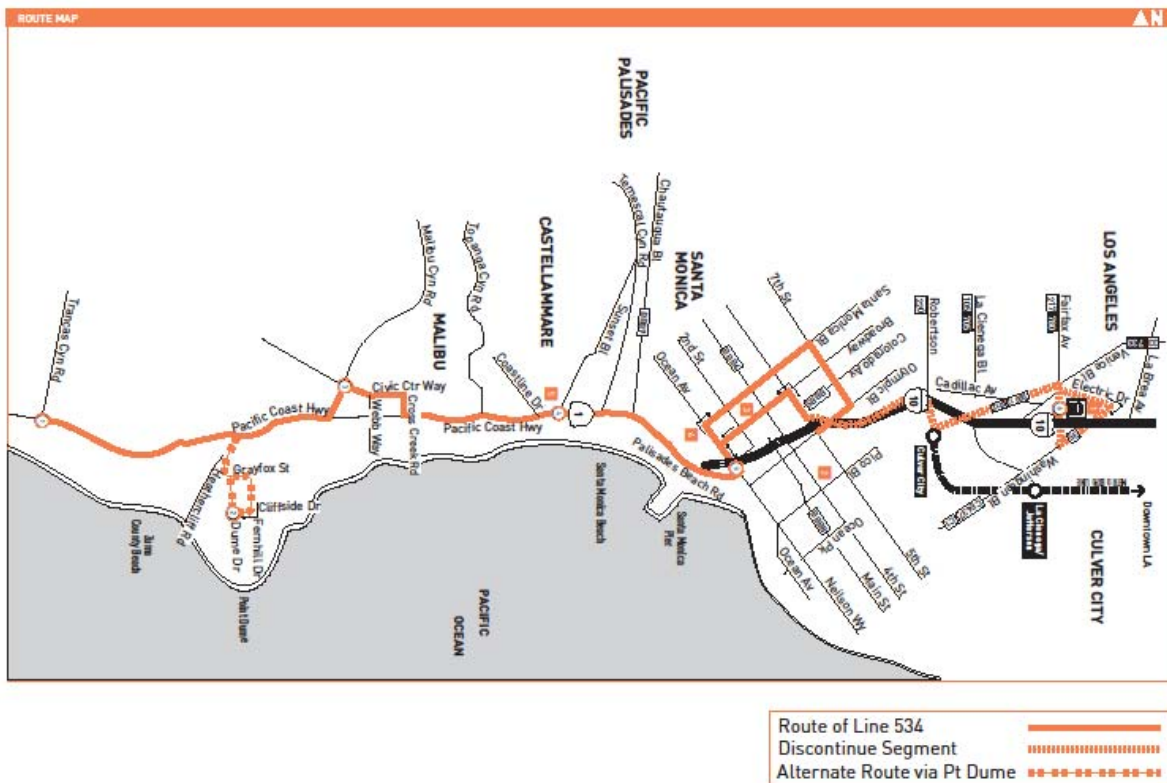


Figure 3
Route 534

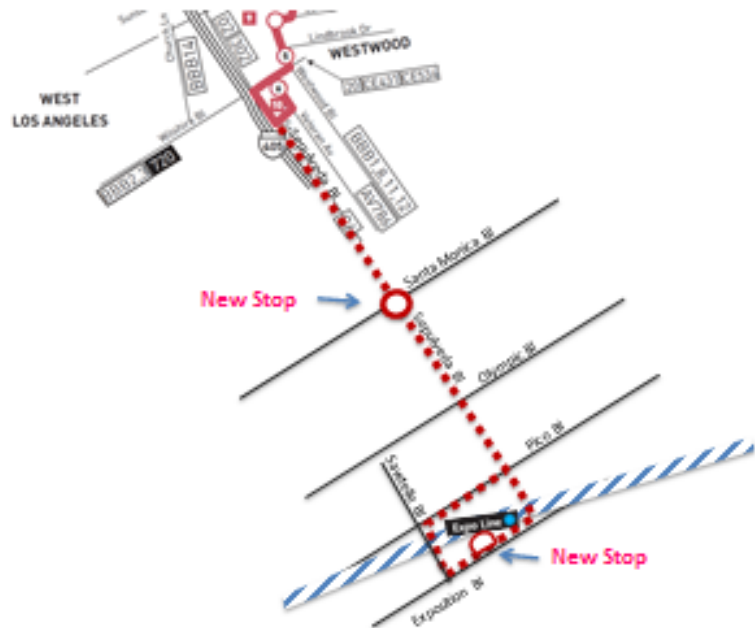
Routes 734 & 234

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.