

**Equity Analysis
Methodology & Results**

**Proposed Bike Share Demonstration Program
Siting of Program Locations
February 2016**

Attachment B

Service Planning and Scheduling
Civil Rights Programs Compliance

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1. PROPOSAL OVERVIEW

A countywide bike share program is under study by Metro. Participants would be able to rent and return a bicycle from any of the program's self service locations. This equity evaluation considers an initial demonstration program that would establish rental locations in and around downtown Los Angeles. Only the siting of these locations is being evaluated. This is not an equity evaluation of program eligibility.

2. METHODOLOGICAL APPROACH

Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.) prohibits discrimination on the basis of race, color, or national origin in any program or activity that receives Federal funds or other Federal financial assistance. Programs that receive Federal funds cannot distinguish among individuals on the basis of race, color or national origin, either directly or indirectly, in the types, quantity, quality or timeliness of program services, aids or benefits that they provide or the manner in which they provide them. This prohibition applies to intentional discrimination as well as to procedures, criteria or methods of administration that appear neutral but have a discriminatory effect on individuals because of their race, color, or national origin.

If policies and practices have a potential discriminatory effect a recipient must modify the proposed changes in order to avoid, minimize, or mitigate potential disparate impacts, and then reanalyze the proposed changes in order to determine whether the modifications actually removed the potential disparate impacts. If the recipient chooses not to alter the proposed policy or practice despite the potential disparate impact, they may implement the policy or practice if they can show that they were necessary to achieve a substantial legitimate objective and that there were no alternatives that would have a less disparate impact on minority populations. Additionally, Persons with limited English proficiency must be afforded a meaningful opportunity to participate in programs that receive Federal funds. Policies and practices may not deny or have the effect of denying persons with limited English proficiency equal access to Federally-funded programs for which such persons qualify.

Environmental justice was first identified as a national policy in 1994 when President Clinton signed Executive Order 12898 (E.O. 12898), *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*. This order requires that each federal agency shall, to the greatest extent allowed by law, administer and implement its programs, policies, and activities that affect human health or the environment so as to identify and avoid "disproportionately high and adverse" effects on minority and low-income populations. E.O. 12898 thus applies to a wider population than Title VI, which does not cover low-income non-minority populations.

A Title VI and Environmental Justice equity evaluation has been completed consistent with the requirements set forth in Executive Order 12890 and 49CFR Section 21.5. While thresholds of significance have been established locally for determining when public transit service or fare changes would cause a burden on minorities (Disparate

Impact), or poverty level populations (Disproportionate Burden), no such thresholds have been established for Metro's non-transit programs. This equity evaluation seeks to determine whether or not there is reason to believe that the siting of bike share facilities might cause a Disparate Impact or Disproportionate Burden.

The basic approach to this analysis is to compare the demographics of the population within one-quarter mile, and within one-half mile, of the proposed bike share facilities to the demographics of Los Angeles County. These distances were chosen on the presumption that the vast majority of bike share users would walk to/from the facilities. Since the availability of a bike share facility is considered a benefit, then the benefiting population should not be significantly less minority or significantly less poor than the county population. If this is so, then there is a presumption of no Disparate Impact on minorities and no Disproportionate Burden on poverty level persons.

Data Sources

Data on the ethnicity and household income levels of the population of Los Angeles county was obtained from the 2010 US Census. Population ethnicity is available at the block group level. The poverty classification of households, and therefore members of those households, was obtained from the 2006-2010 American Community Survey (another US Census data product) and is available at the census tract level.

Step By Step Methodology

A list of the proposed demonstration bike share facility locations was obtained and linked to a geographic database containing census data (Table 1). Two separate analyses were performed: (1) the minority and total populations of all block groups within one-quarter mile, and one-half mile, of any proposed bike share facility were aggregated with the resulting minority population shares being compared to the minority share of the Los Angeles county population, and (2) the poverty and total populations of all census tracts within one-quarter mile, and one-half mile, of any proposed bike share facility were aggregated with the resulting poverty population shares being compared to the poverty share of the Los Angeles county population.

Table 1
Proposed bike Share Demonstration Facility Locations

N Figueroa St & Diamond St	S Grand Ave & W 11th St
Union Station West Portal	S Olive St & W 12th St
N Los Angeles St & N Alameda Street	S Figueroa St & W 8th St
E Temple St & N Alameda St	S Figueroa St & W 9th St
N Main St & W Temple St	S Figueroa St & W 12th St
S Spring St & W 1st St	E 7th St & S Main St
S Grand Ave & W 1st St	S Grand Ave & W 14th St
W Temple St & N Hill St	S Figueroa St & W 18th St
Hill St at Metro Station/Grand Park	Willow St & Mateo St
S Olive St & W 6th St	Mateo St & E 7th St
S Hill St & W 5th St	E 5th St & Wall St
W 5th St & S Grand Ave	Wall St & E 7th St
W 7th St & S Flower St	S San Pedro Street & E 7th St
S Flower and W 7th St	E 11th St & Santee St
W 7th St & S Flower St	E Pico Blvd & Santee St
S Grand Ave & W 9th St	Kohler St & E 6th St
S Figueroa St & W 11th St	E 7th St & S Alameda St
W Pico Blvd & S Figueroa St	E 2nd St & S San Pedro St
W 12th St & S Hill St	Boyd St & S San Pedro St
S Grand Ave & W Washington Blvd	Crocker St & E 6th St
S San Pedro St & E Washington Blvd	S Main St & E 5th St
S Hope St & W Pico Blvd	Ord St & New High St
E 5th St & S Hewitt St	New High St & Ord St
E 3rd St & Rose St	N Spring St & W College St
E 3rd St & S Santa Fe Ave	N Alameda St & Alpine St
S San Pedro St & E 1st St	Union Station East Portal
S Grand Ave & W 7th St	S Grand Avenue & W 3rd St
W 2nd St & S Figueroa St	S Broadway & W 3rd St
W 2nd St & S Hill St	S Hope St & W Olympic Blvd
S Figueroa St & W Cesar Chavez Ave	S Broadway & W 9th St
S Spring St & W 3rd St	S Broadway & W 11th St
S Main St & E 4th St	N Broadway & W Cesar Chavez Ave
S Main St & E 1st St	S San Pedro St & E 8th St
S Spring St & W 5th St	S Maple St & E 9th St
S Main St & E 6th St	Wilshire Boulevard & Witmer Street
W 7th St & S Spring St	S Wall Street & E 11th Street
S Hill St & W 7th St	W College Street & N Hill Street
S Hope St & W 6th St	E Temple Street & N Vignes Street
W 7th St & S Bixel St	E Pico Street & S San Pedro Street
E 9th St & S Main St	E Olympic Boulevard & S Central Avenue
S Main St & E 9th St	E Washington Boulevard & S Central Avenue
S Olive St & W 8th St	S Central Avenue & E 15th Street

3. RESULTS

The comparison of minority shares of the Los Angeles county population and those within block groups within one-quarter mile and one-half mile of proposed bike share facilities is depicted in Table 2.

	Total Population	Minority Population	Minority Share
LA County Population	9,818,605	6,869,996	70.0%
Within 1/4 mile of Bike Share Facility	113,401	95,574	84.3%
Within 1/2 mile of Bike Share Facility	157,839	137,100	86.9%

Similarly, the comparison of poverty shares of the Los Angeles county population and those within census tracts within one-quarter mile and one-half mile of proposed bike share facilities is depicted in Table 3.

	Total Population	Poverty Population	Poverty Share
LA County Population	9,604,871	1,508,618	15.7%
Within 1/4 mile of Bike Share Facility	107,367	46,213	43.0%
Within 1/2 mile of Bike Share Facility	145,401	60,101	41.3%

There is no Disparate Impact and no Disproportionate Burden associated with the proposed bike share demonstration program because both the minority shares and poverty shares of the populations within one-quarter mile and one-half mile of the

proposed bike share facilities are higher than the respective countywide shares of minority and poverty populations, respectively.