

**Equity Analysis
Methodology & Results**

**Proposed Bike Share Expansion Program
Siting of Program Locations
February 2017**

Service Planning and Scheduling
Office of Civil Rights

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1. PROPOSAL OVERVIEW

Metro's countywide bike share program is being expanded into Pasadena, Port of Los Angeles and Venice. Participants would be able to rent and return a bicycle from any of the program's self service locations. This equity evaluation considers the expansion program that would establish rental locations in and around these expansion areas. Only the siting of these locations is being evaluated.

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 it was 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. This aspect of Title VI is not evaluated with regard to the placement of program facilities.

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 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. One

of the primary purposes of a bike share network is to provide first and last mile connectivity for the transit system. As such a bike share system can be considered as a transit amenity and a similar methodology can be used to determine the Title VI and Environmental Justice Impacts. This equity evaluation is based on the analysis of this amenity in the context of the entire system and uses the same thresholds that are applied to other transit amenities. *-

The basic approach to this analysis is to compare the demographics of the population within one-half mile of the proposed bicycle share facilities to the demographics of Los Angeles County. This distance was 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 existing and proposed demonstration bicycle share facility locations was obtained and linked to a geographic database containing census data (Tables 1 and 2). Two separate analyses were performed: (1) the minority and total populations of all block groups within one-half mile of the combined bicycle share facilities 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-half mile of the combined bicycle share facilities were aggregated with the resulting poverty population shares being compared to the poverty share of the Los Angeles county population.

Table 1
Existing Bicycle Shared Facility Locations

11th St. at Maple Ave.	Industrial St at Mateo St.
11th St. at Santee St.	Los Angeles at Temple St.
12th St. at Hill St.	Main St. at 1 st
18th St. at Figueroa St.	Main St. at 4th St.
18th St. at San Pedro St.	Main St. at 5 th St.
1st St. at Judge John Aiso	Main St. at 6 th St.
2nd St. at Figueroa St.	Main St. at 9 th St.
2nd St. at Hill St.	New High St. at Ord St.
3rd St. at San Pedro St.	Olive St. at 5 th
3rd St. at Santa Fe Ave.	Olive St. at 8 th
5 th St. at Grand Ave.	Pico Bl. at Flower St.
5th St. at Hewitt St.	Pico Bl. at Maple St.
7th St. at Bixel St.	San Julian St. at 12 th St.
7 th St. at Broadway	Spring St. at 3 rd St.
7 th St. at Main St.	Spring St. at College St.
7 th St. at Spring St.	Stanford St.at 12 th St.
8th St. at Wall St.	Temple St. at Vignes St.
9th St. at Los Angeles St.	Traction Ave. at Rose St.
Broadway at 3 rd St.	Union Station West Portal
Broadway at 9 th St.	Willow St. at Mateo St.
Factory Place at Alameda	Wilshire Bl. at Witmer St.
Figueroa St. at 8 th St.	
Figueroa St. at 9 th St.	
Figueroa St. at Chavez Ave.	
Figueroa St. at Pico Bl.	
Flower St. at 7 th St.	
Grand Ave at 14 th St.	
Grand Ave at 3 rd St.	
Grand Ave at 7 th St.	
Grand Ave at Olympic Bl.	
Grand Ave at Temple St.	
Grand Ave at Washington Bl.	
Hill St. at College St.	
Hill St. at Washington Bl.	
Hope St. at 11 th St.	
Hope St. at 1 st St.	
Hope St. at 6 th St.	
Hope St. at Olympic Bl.	
Imperial at 7 th St.	

Table 2
Proposed Bicycle Shared Facility Locations

Pasadena (Proposed)

Huntington Hospital
 Marengo Ave at Green St
 Colorado Bl. at Garfield Ave (Paseo Colorado)
 Garfield Ave at Holly St
 Pasadena Library at Walnut
 Orange Grove Blvd at Walnut St

 Fair Oaks Ave at Peoria St
 E Union St at Lake Ave

 Lake Ave at Del Mar Bl.

 Lake Ave at California Bl.
 Chester Ave at Cordova Ave
 Colorado Bl. at Bonnie Ave
 Raymond Ave at Fillmore St
 MTA ROW at Holly St.
 Lake Ave at Maple Ave
 Allen Ave at Corson St

 Raymond Ave at Del Mar Bl.
 Green St at Hill Ave
 Pasadena Ave at Dayton St
 Oakland Ave at Union St

 Lake Ave at Merrett Dr
 Madison Ave at Green St
 Wilson Ave at San Pasqual St
 Oak Knoll Ave at Colorado Bl.
 Wilson Ave at Colorado Bl.
 MTA ROW at Colorado Bl.
 Fair Oaks Ave at Mountain St
 Lake Ave at Cordova St
 Mercantile Alley
 Bellevue at Arroyo Parkway

 Cordova at Los Robles
 Rose Bowl
 Caltech East

Port of Los Angeles (Proposed)

Swinford and N Front Street
 Catalina Express site
 USS Iowa
 6th street and Sampson
 Crafted at 22nd St.
 Ports O'Call at Nagoya Way
 Cabrillo-Marina/ Doubletree
 driveway
 Cabrillo Beach
 Wilmington Waterfront Park
 (West)
 Wilmington Waterfront Park
 (East)
 S Avalon Blvd and Water Street

Venice (Proposed)
 Venice Blvd at Abbott Kinney Bl.
 Venice Blvd at Pisani Pl.
 Abott Kinney Bl. at California Ave.
 Abott Kinney Bl. at Cadiz Ct.
 Abott Kinney Bl. at Westminster
 Ave.
 Washington Bl. at Pacific Ave.
 Washington Bl. at Strongs Ave.
 Washington Bl. at Dell Ave.
 Washington Bl. at Abbot Kinney
 Bl.
 Venice Bl. At Walgrove Ave.
 Venice Bl. At Lincoln Bl.
 California Ave at Lincoln Bl.
 Rose Ave at 7th Ave.
 Rose Ave at Rennie Ave.
 Rose Ave at Main St.
 Main St at Rose Ave.
 Ocean Front Walk at N Venice Bl.
 N Venice Bl. at Pacific Ave.
 Windward Ave at Windward
 Circle
 Main St at Winward Circle
 7th Ave at San Juan Ave.
 Ocean Front Walk at Navy St.

3. RESULTS

The comparison of minority shares of the Los Angeles county population and those within block groups within one-half mile of proposed bike share facilities is depicted in Table 3.

	Total Population	Minority Population	Minority Share
LA County Population	9,181,605	6,869,996	70.0%
Within 1/2 mile of combined Bicycle Share Facilities	387,303	255,199	65.9%

Similarly, the comparison of poverty shares of the Los Angeles county population and those within census tracts within one-half mile of proposed bike share facilities is depicted in Table 4.

	Total Population	Minority Population	Minority Share
LA County Population	9,604,871	1,508,618	15.7%
Within 1/2 mile of combined Bicycle Share Facilities	404,310	98,452	24.4%

The minority share of the population benefitting from the proposed wexpanded program is greater than that of the County, so there is no Disparate Impact from the expanded program.

The proposed expanded bike share program will not cause a Disproportionate Burden on poverty populations as the poverty share of impacted persons is greater than the County's poverty share.