

**Equity Analysis
Methodology & Results**

**Proposed Bike Share Program
Siting of Program Locations
October 2017
Revised February 2018**

Service Planning and Scheduling
Civil Rights Programs Compliance

Contents

1.	Proposal Overview	1
2.	Methodological Approach.....	1
	Data Sources.....	2
	Step By Step Methodology.....	2
3.	Results.....	4

1. PROPOSAL OVERVIEW

Metro's countywide bike share program has developed a five phase plan for implementing the bike share program in 40 community areas. Participants would be able to rent and return a bicycle from any of the program's self service locations. The first two phases of the program have been implemented, and were previously evaluated for Title VI and Environmental Justice impacts. This document's evaluation considers the overall program. This evaluation compares the demographics of those community areas that would benefit from the program with the demographics of Los Angeles County.

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 populations within the proposed community areas that would receive bicycle share facilities to the demographics of Los Angeles County. 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 a Disparate Impact on minorities and/or a 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 2011-2015 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 community areas that would receive bicycle 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 the proposed bicycle share community areas 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 the proposed bicycle share community areas were aggregated with the resulting poverty population shares being compared to the poverty share of the Los Angeles county population.

Bicycle Share Program Phasing as of October 2017

Service Area	City	Square Mi.
<i>Phase 1</i>		
Downtown Los Angeles	Los Angeles	6.2
<i>Phase 2</i>		
Port of LA	Los Angeles	4.6
Venice	Los Angeles	4.7
Central Pasadena	Pasadena	4.1
<i>Phase 3</i>		
Baldwin Park	Baldwin Park	1.2
Claremont	Claremont	1.3
Covina	Covina	1.5
Culver City	Culver City	7.1
Del Rey	Los Angeles	2.4
Duarte	Duarte	1.6
Echo Park	Los Angeles	2.6
El Monte	El Monte	1.3
Glendora	Glendora	3.8
Koreatown	Los Angeles	6.3
La Canada Flintridge	La Canada Flintridge	4.2
La Verne	La Verne	1.3
MacArthur Park – Westlake	Los Angeles	4.1
Marina del Rey	Los Angeles County	2.2
Mar Vista	Mar Vista	2.3
Monrovia	Monrovia	2.1
Monterey Park	Monterey Park	2.6
Palms	Los Angeles	2.5
Playa del Rey	Los Angeles	2.7
Playa Vista	Los Angeles	1.3
Pomona	Pomona	1.8
San Dimas	San Dimas	2.5
Silver Lake	Los Angeles	3.5
South El Monte	South El Monte	1.2
South Pasadena	South Pasadena	1.8
West Covina	West Covina	1.3
University park	Los Angeles	3.8
<i>Phase 4</i>		
Burbank	Burbank	1.8
East Hollywood	Los Angeles	2.9
East Los Angeles	Los Angeles County	1.3
Glendale	Glendale	6.4
Hollywood	Los Angeles	6.6
North Hollywood	Los Angeles	1.5
<i>Phase 5</i>		
Boyle Heights	Los Angeles County	3.5
Downey	Downey	2.0
Huntington Park	Huntington Park	1.6
Inglewood	Inglewood	2.3
Mid-City	Los Angeles	5.4
Whittier	Whittier	1.6
Total Program Area		126.8

3. FINDINGS

The comparison of minority shares of the Los Angeles county population and those within block groups within the proposed bike share community areas is depicted in Table 2.

Table 2 Minority Population Shares			
	Total Population	Minority Population	Minority Share
LA County Population	9,411,367	6,657,943	70.7%
Proposed Bicycle Share Community Areas	3,702,499	2,702,228	73.0%

Similarly, the comparison of poverty shares of the Los Angeles county population and those within census tracts within the proposed bike share community areas is depicted in Table 3.

Table 3 Poverty Population Shares			
	Total Population	Minority Population	Minority Share
LA County Population	9,576,850	1,747,429	18.2%
Proposed Bicycle Share Community Areas	4,022,592	723,485	18.0%

The minority population benefitting from the proposed program is an absolute 2.3% greater than the minority population of the County, and a relative 3.3% greater than the County. While there is no adopted standard for what constitutes a significant difference for a transit amenity, the absolute 5% difference threshold, and relative 20% difference threshold, applicable to transit service suggests that these differences would result in no Disparate Impact.

The poverty population benefitting from the proposed program is an absolute 0.2% less than the poverty population of the County, and a relative 1.1% less than the County. While there is no adopted standard for what constitutes a significant difference for a transit amenity, the absolute 5% difference threshold, and relative 20% difference threshold, applicable to transit service suggests that these differences would result in no Disproportionate Burden.