

EVALUATION OF DISCONTINUED DAY PASS SALES ON BUSES

Federal Transit Administration (FTA) Circular 4702.1B provides guidance for the conduct of equity evaluations of proposed service and fare changes. A transit operator must have a locally adopted process for determining when public hearings, and the equity evaluations associated with such proposals, are required. Impacts to both minority and poverty level persons must be assessed, and there must be locally adopted standards for when differences between impacted persons and everyone else are significant.

Metro's Administrative Code contains these rules and definitions in Section 2-50. A public hearing and equity evaluation is required for any fare change. The difference between the minority/poverty shares of impacted riders and all others is deemed significant if the absolute difference is 5% or greater, or the relative difference is 35% or more, whichever is less.

Proposal to be Evaluated

At the present time, Metro riders may purchase a Day Pass on buses, at rail or Orange Line stations, through Metro Customer Centers, and through third party sales outlets; Also online at taptogo.net and by calling 866.TAPTOGO. The cost of the pass is the same everywhere, except TVMs and onboard bus which are both \$1. However, while there is an added \$1.00 charge for the TAP card at all Metro points of sale, third party outlets charge \$2.00 for the card. Because TAP cards may be reused, and have an expected lifetime of ten years, the price difference for the differing sales outlets is considered de minimus.

The proposed action would discontinue the sale of Day Passes on buses. This would eliminate drivers carrying blank fare media, and reduce the complexity of inventory control of these media. It could have a minor impact on speeding boarding times on buses.

Title VI Evaluation and Findings

The most current available ridership data was collected as part of the Spring 2016 Customer Satisfaction Survey. The relevant data provided by this survey includes method of payment, discount category, ethnicity, and poverty status. Day pass users were found to be 91.78% minority compared with 88.24% minorities among all users. This is not a significant difference (3.54%) using Metro's current definitions, so there is no apparent disparate impact from this proposal.

In November 2013 Metro staff performed a demographic analysis of residential access to Day Passes. A summary of those findings with respect to minorities is provided in Table 1.

Table 1

Group	Walk Accessibility	Minority Population	non-Minority Population	Minority Share
1	Bus Only	2,677,947	1,272,089	67.80%
2	Bus & Sales Outlet	2,668,417	802,948	76.87%
		5,346,364	2,075,037	72.04%

The demographic data of Table 1 does not represent riders, but rather residents who have access to sources of Day Passes, as indicated. We are only concerned with the subset of the general population who have walk access to bus because those that don't would not be impacted by the proposed action.

The data shows that there is no significant difference in minority representation between those who only have walk access to the bus and those who also have walk access to other sources for TAP card recharging. This provides added evidence that there would be no disparate impact from this proposal.

Environmental Justice Evaluation and Findings

The share of Day Pass users below the poverty level is 33.69% compared with 43.75% of all riders. This is a significant difference (-10.06%) using Metro's current definitions, but there is no disproportionate burden imposed because the adversely impacted riders are significantly less poor than all riders.

In November 2013 Metro staff performed a demographic analysis of residential access to Day Passes. A summary of those findings with respect to poverty status is provided in Table 2.

Table 2

Group	Walk Accessibility	Poverty Population	non-Poverty Population	Poverty Share
1	Bus Only	375,761	2,783,237	11.89%
2	Bus & Sales Outlet	897,431	3,657,136	19.70%
		1,273,192	6,440,373	16.51%

The data shows that there is no significant difference in poverty representation between those who only have walk access to the bus and those who also have walk access to other sources for TAP card recharging. This provides added evidence that there would be no disproportionate burden from this proposal.