

# Title VI Service Equity Analysis

## NOHO TO PASADENA TRANSIT CORRIDOR



**Metro**<sup>®</sup>

WINTER 2020



## Overview

The Los Angeles County Metropolitan Transportation Authority (Metro) serves as transportation planner and coordinator, designer, builder, and operator for one of the country's largest, most populous counties. More than 10.1 million people live and work within the 1,479-square-mile service area. Figure 1 provides an overview of the Metro Service Area.

Over the coming decades, Metro will greatly expand the fixed-guideway rail and bus network throughout Los Angeles County due to the passage of the Measure M ballot initiative in November 2016. The half-cent sales tax increase is expected to provide upwards of \$130 billion for the development of new transit lines and other transportation capital investments throughout Los Angeles County.

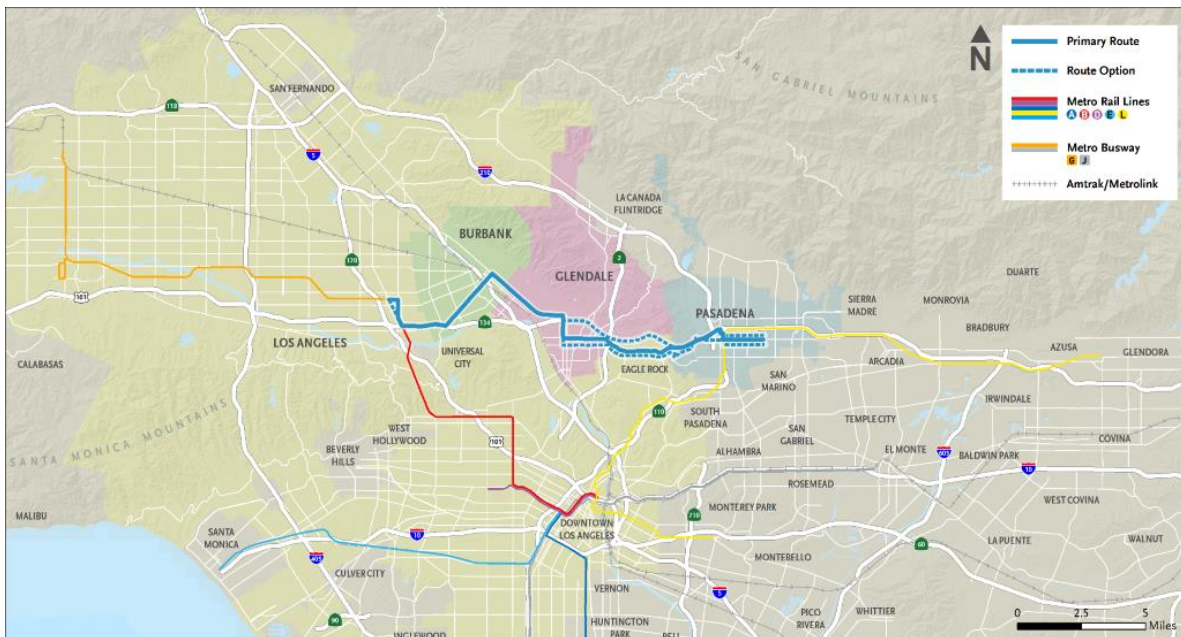


Figure 1. Metro Service Area (map)

## Proposed Alternatives

Metro operates a large and varied transit network in the San Fernando and San Gabriel Valleys and is advancing the planning and construction of multiple high-capacity transit improvements that will provide new, high-quality mobility options to further enhance communities and lives. The North Hollywood to Pasadena Bus Rapid Transit Corridor (Project) is a proposed new Bus Rapid Transit (BRT) line that would improve service and increase system connectivity between the communities of North Hollywood, Burbank, Glendale, Eagle Rock, and Pasadena. Approximately 18 miles long, the Project is designed to provide a rapid transit connection between the B and G Lines (Red and Orange) in the San Fernando Valley and the L Line (Gold) in Pasadena. The proposed route and route options, transit priority features, and stations were developed to provide faster and more reliable service that connects new and existing transit users to key destinations and other transit services. Other project goals and objectives include improving the frequency of service, meeting the growing demand for transit in the study area, and increasing transit ridership.

During the preparation of the Draft Environmental Impact Report (DEIR), Metro identified a proposed Project along with several route options:

The proposed route extends from the North Hollywood Station along Chandler Boulevard, Vineland Avenue, and Lankershim Boulevard before joining the I-134 Freeway. The route then exits the freeway in the Burbank Media District before proceeding along Olive Avenue to Downtown Burbank. From Downtown Burbank, the route continues down Glenoaks Boulevard to Central Avenue in Glendale. The route extends down Central Avenue, along Broadway, and eventually merges with Colorado Boulevard in Eagle Rock. The route then rejoins the I-134 Freeway between Eagle Rock and Pasadena before exiting in Old Pasadena and extends along Colorado Blvd to the terminus at Hill Avenue by Pasadena City College (PCC).

Route options also featured in the DEIR include a Lankershim only option in North Hollywood, using the I-134 or Colorado Street in Glendale, using the I-134 in Eagle Rock, and using a Green/Union couplet in Pasadena.

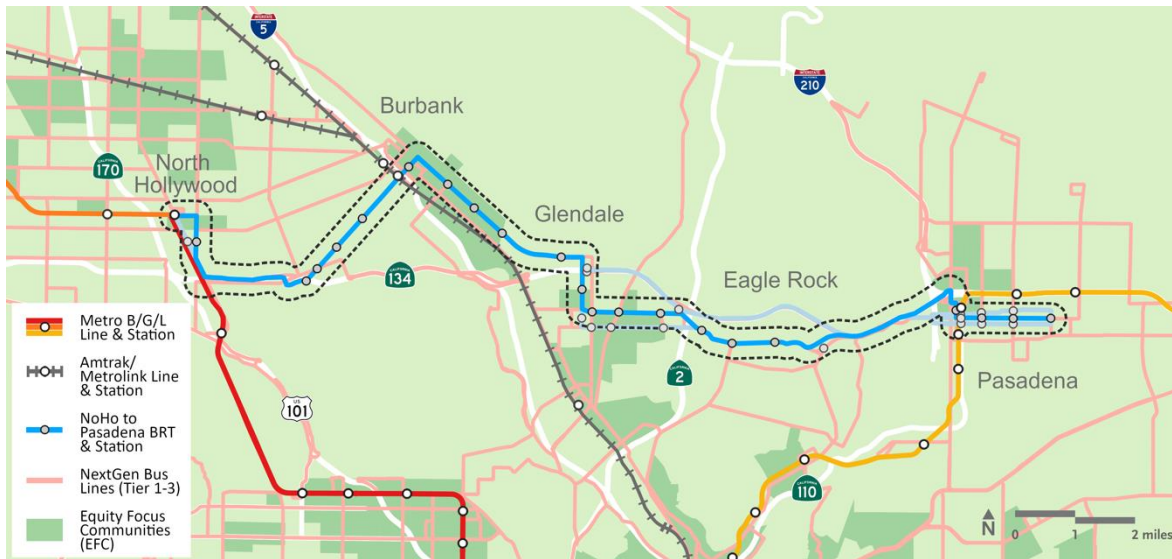
The proposed project and all route options are being closely coordinated with the NextGen Bus Plan to ensure that proposed BRT improvements are complementary to the future regional bus network. The project also uses Metro's definition of Equity Focused Communities (EFC) to actively lead and partner in addressing disparities in access to opportunity.

As adopted by the Metro Board of Directors on June 27, 2019, EFCs are defined as "those communities most heavily impacted by gaps in inequity throughout the county." To evaluate the transportation performance of EFCs, Metro established a 30% threshold of the county's census tracts, which represents approximately 3 million people. This threshold is distinguished by the following factors:

- More than 40% of the census tracts having low-income households over the County average; and
- Either more than 80% of the census tracts having non-white populations over the County average; or
- More than 10% of the census tracts having zero-car households over the county average

Figure 2 shows the project alternatives overlaid with the NextGen bus network and EFCs.





**Figure 2. Project Area (map)**

## Purpose

Title VI of the Civil Rights Act of 1964 is a Federal statute and provides that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Federal Transit Administration (FTA) is responsible for ensuring that recipients of Federal funds follow Federal statutory and administrative requirements. In 2012, FTA issued Circular 4702.1B, which provides recipients of FTA financial assistance with guidance and instructions necessary to carry out the United States Department of Transportation Title VI requirements.

Metro operates its service without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964, as amended. The purpose of this analysis is to compare the Project, pursuant to Title VI of the Civil Rights Act of 1964, to the Metro Service Area. Since the Project will introduce a new service line, it is necessary to determine whether the change will have a disparate impact on the minority population or a disproportionate burden on the low-income population. The goal is to avoid activities that have the purpose or effect of denying persons the benefit of, excluding persons from participation in, or subjecting persons to discrimination on the basis of race, color, or national origin. Additional analysis may be completed prior to the construction phase based on final design decisions.



## **Regulatory Setting**

### **FTA Circular 4702.1B Chapter IV**

Chapter IV of the FTA's Circular 4702.1B further describes the requirements that FTA recipients must follow to ensure that the programs, policies, and activities comply with the Title VI requirements. The requirements set system-wide service standards and policies that apply to all fixed route providers of public transportation service.

Title 49 CFR Section 21.5 (b)(2) specifies that a recipient shall not "utilize criteria or methods of administration which have the effect of subjecting persons to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program with respect to individuals of a particular race, color, or national origin." Section 21.5 (b)(2) requires recipients to "take affirmative action to assure that no person is excluded from participation in or denied the benefits of the program or activity on the grounds of race, color, or national origin."

Transit providers that operate 50 or more fixed route vehicles in peak service and are located in an urbanized area (UZA) of 200,000 or more in population are required to meet all requirements of Chapter IV including setting service standards and policies, collecting and reporting data, monitoring transit service, and evaluating fare and service changes.

### **Metro's Administrative Code, Chapter 2-50-005**

Metro's Administrative Code includes Title VI requirements. Chapter 2-50-005, Major Service Changes, of Metro's Administrative Code states that "all major increases or decreases in transit service are subject to a Title VI Equity Analysis prior to Board approval of the service change. A Title VI Equity Analysis completed for a major service change must be presented to the Board of Directors for their consideration and then forwarded to the FTA with a record of the action taken by the Board." The Project is classified as a major service change per subsection 6 of Metro's Administration Code 2-50-005(B), which includes a "new fixed guideway project (e.g. BRT line or rail line)."

### **Metro Title VI Program Update**

Metro prepared the Title VI Program Update in compliance with Title 49 CFR Section 21.9 (b) and with the FTA Circular 4702.1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," issued in October 2012. The purpose of the Title VI Program Update is to document the steps Metro has taken and will take to ensure Metro provides services without excluding or discriminating against individuals on the basis of race, color, or national origin. The Title VI Program Update provides an outline of Metro's Title VI policies including what constitutes a major service change, the disparate impact, and disproportionate burden policy. Metro staff recommended that the absolute difference be considered when evaluating service and fare changes. The Title VI Program Update also includes the general requirements for Title VI and the requirements for fixed route transit providers. In October 2019, the Metro Board approved the Metro Title VI Program Update. The latest Title VI Program Update was submitted to FTA by the due date of November 1, 2019.

**Disparate Impact**

Disparate impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color or national origin and the policy lacks a substantial legitimate justification, including one or more alternatives that would serve the same legitimate objectives but with less disproportionate effects on the basis of race, color or national origin. This policy defines the threshold Metro will utilize when analyzing the impacts to minority populations and/or minority riders. For major service changes, a disparate impact will be deemed to have occurred if the absolute difference between the percentage of minority adversely affected and the overall percentage of minorities is at least five percent per Metro’s Title VI Program.

**Analysis Methodology**

In order to understand the characteristics of the Project’s service area and assess whether the change will have a disparate impact on the minority population, this analysis evaluates the ethnicity demographic data of the populations that would receive the new transit service. The data is then compared to the ethnicity demographic data of the Metro Service Area. If the absolute difference between the minority percentage along the Project and the Metro Service Area percentage is at least five percent, an impact is deemed to have occurred.

Consistent with other Metro Title VI reports, this analysis uses ethnicity data from the 2017 American Community Survey (ACS) at the census tract level. Los Angeles County data is used to represent the Metro Service Area. For the Project, including all route options, a quarter-mile buffer along the alignment is used to evaluate a reasonable walkshed to the new transit service and acts as the service area for this analysis.

**Results**

Figure 3 includes a comparison of the percentages of minority populations residing within the Project’s service area compared to the total minority population for the Metro Service Area. Figure 4 displays the demographic data for the Metro Service Area overlaid with the proposed Project and the quarter-mile service area boundary. The absolute differences in minority percentages between the Metro Service Area and the Project is -29.4%. No disparate impact would occur since the Project’s difference is below Metro’s five percent threshold.

NoHo-Pas Minority Percentage	LA County	Prop. Project
Total Population	10,105,722	272,752
Minority Population	7,428,740	120,212
Minority Share	73.50%	44.10%
Difference		-29.40%

*Figure 3. Minority Population*

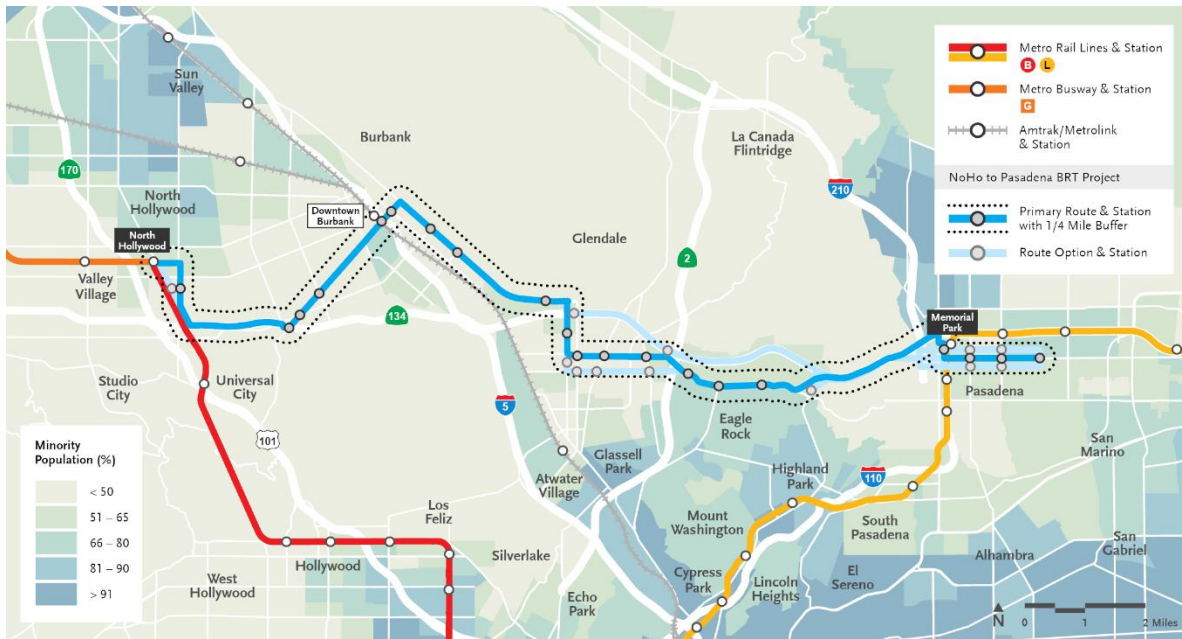


Figure 4. Minority Population (map)

## Disproportionate Burden

Disproportionate burden refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. Metro defines low-income riders or populations as anyone making below \$41,500, which represents the median income of a three-person household in Los Angeles County. A finding of disproportionate burden for major service and fare changes requires Metro to evaluate alternatives and mitigate burdens where practicable. For major service changes, a disproportionate burden will be deemed to exist if an absolute difference between percentage of low-income adversely affected by the service change and the overall percentage of low-income persons is at least five percent per Metro’s Title VI Program.

## Analysis Methodology

In order to understand the characteristics of the Project’s service area and assess whether the change will have a disproportionate burden on the low-income population, this analysis evaluates the income demographic data of the populations that would receive the new transit service. The data is then compared to the income demographic data of the Metro Service Area. If the absolute difference between the low-income percentage along the alternatives and the Metro Service Area percentage is at least five percent, an impact is deemed to have occurred.

Consistent with other Metro Title VI reports, this analysis uses income demographic data from the 2017 ACS at the census tract level. Los Angeles County data is used to represent the Metro Service Area. For the Project, including all route options, a quarter-mile buffer along each of the proposed routes is used to evaluate a reasonable walkshed to the new transit service and serves as the service area for this analysis.



## Results

Figure 5 includes a comparison of the percentages of low-income populations residing within the Project’s service area compared to the total low-income population for the Metro Service Area. Figure 6 displays the demographic data for the Metro Service Area overlaid with the proposed Project and the quarter-mile service area boundary. The absolute differences in low-income percentages between the Metro Service Area and the Project is –1.5%. No disproportionate burden would occur since the Project’s difference is below Metro’s five percent threshold.

NoHo-Pas BRT Low-Income Percentage	LA County	Prop. Project
Total Population	9,955,473	270,443
Low-Income Population	1,688,505	41,888
Low-Income Share	17.0%	15.5%
Difference		-1.50%

Figure 5. Low-Income Population

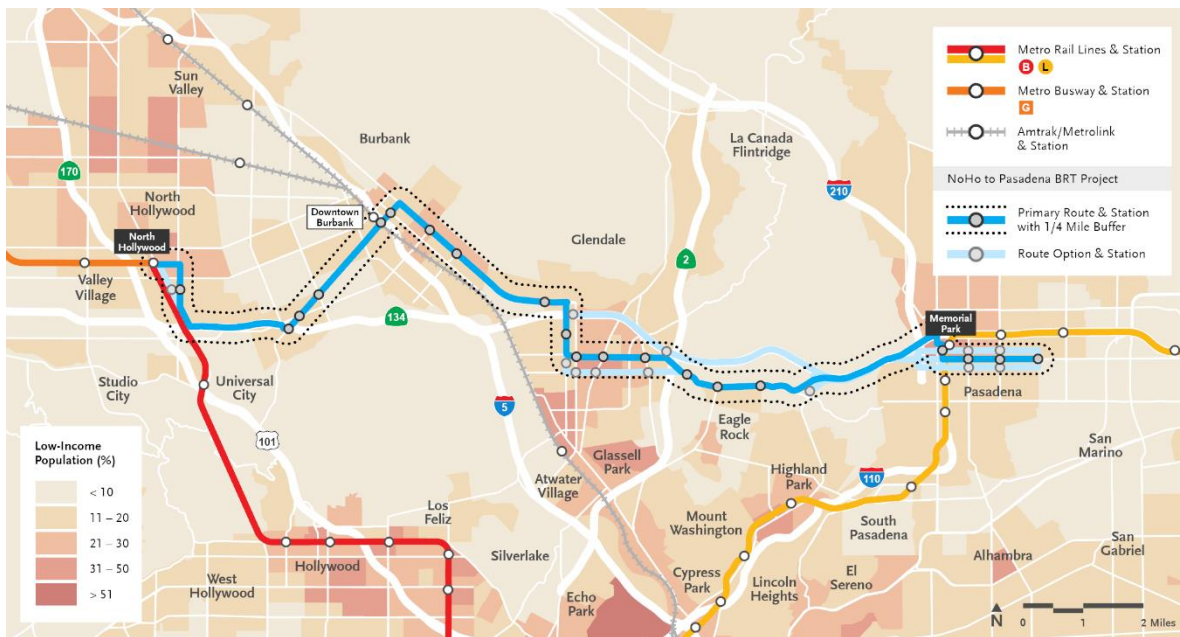


Figure 6. Low-Income Population (map)

## Public Outreach

Metro emphasizes public involvement in the planning process and seeks inclusive and collaborative participation in decision-making. A comprehensive community outreach, public information, and engagement strategy is designed to serve all stakeholders regardless of their gender or age and including Limited English Proficiency (LEP), minority, and low-income populations. The strategies and implementation combine traditional outreach practices with evolving technologies. The development of each specific public participation plan includes the assessment of how best to

effectively communicate with technology within LEP, minority, and low-income communities, coupled with outreach methods to engage people with disabilities, hard-to-reach communities, and general population stakeholders. This combined approach provides meaningful and broad access to the public process.

### **Alternatives Analysis Outreach (2018)**

Metro conducted proactive outreach for the North Hollywood to Pasadena BRT Corridor Project in compliance with FTA's Circular 4702.1B and will continue to engage in outreach to persons potentially impacted by the Project. In May 2018, the Metro Board authorized initiation of the North Hollywood to Pasadena BRT Corridor Planning and Environmental Study, and staff began work on the Alternatives Analysis (AA) in June 2018. As part of the study, community meetings, outreach events, and agency meetings were conducted throughout the remainder of 2018 to introduce the project and solicit public input. All community meetings included simultaneous Spanish interpretation and handouts of outreach materials in Spanish. Meetings in Glendale included simultaneous Armenian interpretation and transition to additional languages was available upon request. Meetings were held in venues that would be welcoming to diverse stakeholders, such as libraries, high schools, and recreation centers. Meetings were conducted in workshop formats to allow one-on-one dialogues with project staff and to receive comments directly on outreach materials and maps of the corridor. All meetings included children's activities and were advertised to promote a welcoming environment and encourage attendance by families. Pop-up outreach events were selected to reach diverse populations, historically underserved and low-income communities, and attended by Spanish-speaking project team members. The Metro team successfully engaged with stakeholders at the North Hollywood Block Party, the Burbank Holiday in the Park, the Glendale Fall Festival, and the Eagle Rock Music Festival.



*Alternatives Analysis Meeting in Glendale*



*Alternatives Analysis Meeting in Glendale*



*Alternatives Analysis Meeting in North Hollywood*



*Alternatives Analysis Meeting in Pasadena*

### **DEIR Public Scoping (Summer 2019)**

After the AA Study was completed in June 2019, Metro began preliminary work on the Draft Environmental Impact Report (DEIR) per the requirements of the California Environmental Quality Act (CEQA). The first step was filing the Notice of Preparation (NOP). The NOP was filed with both the Los Angeles County Clerk and State Clearinghouse on June 17, 2019. The NOP was mailed to responsible agencies (the four cities along the corridor and Caltrans) and members of the public to transmit their comments on the scope and content of the DEIR, focusing on specific information related to their own statutory responsibility, within 60 days of receipt of the NOP from the lead agency

Metro also held five scoping meetings and a community open house in July and August 2019 in North Hollywood, Burbank, Glendale, Eagle Rock, and Pasadena. The meetings considered LEP, minority, and low-income community members and individuals with disabilities on varied work and family schedules. Meeting times and venues were selected to allow for greater participation of diverse groups, including under-represented and hard-to-reach stakeholders. Metro publicized meetings through multiple distribution channels and selected transit-accessible venues. The scoping meetings included an open-house format where participants could engage in one-on-one dialogue



with project staff at different information stations, as well as a formal presentation by the Project Manager. Multiple methods of providing scoping comments were provided including written comment cards and transcribed oral comments. Spanish outreach materials and related staff assistance for LEP populations were provided as needed. Children’s games and activities were provided to encourage families to stop by to view project materials. More than 800 people attended the community meetings, including over 280 attendees at the community open house on the Occidental College campus. In total, 792 comments were provided in-person at these meetings. In addition to the meetings, the Metro team conducted presentations and outreach efforts at a variety of community fairs and events in the study area to continue to build project awareness, expand the stakeholder database and invite public input.

Approximately 2,500 comments were received during the public scoping period. Major themes from those comments included:

- Strong community preferences for specific route alternatives and street configurations
- Concerns over potential impacts on parking, traffic, and “community character”
- Interest in bicycle and pedestrian connectivity with stations
- Support for a high-quality, high-frequency transit option

The comments received during scoping informed the analyses and methodologies used during the preparation of the DEIR.



*Scoping Meeting in Eagle Rock*



*Scoping Meeting in Glendale*



*Scoping Meeting in Pasadena*



*Community Open House in Eagle Rock*

## **Community Workshops (Fall 2019)**

Based on the volume of input received during the public scoping period, Metro held an additional series of eight community workshops in November 2019. These consisted of a brief presentation, followed by several interactive activities including a virtual polling survey, priority pyramid, and street design activity. Some activities were tailored to each of the five communities. For example, in Pasadena, a different street activity showing the various route options and a focus on station amenities was conducted given the proposed mixed-traffic configuration of bus lanes. The activities' purpose was to gain additional feedback on the street and station design considerations, understand priorities within each community and the importance of different street amenities. Noticing for the workshops included a series of eight email blasts to the Project database, consisting of over 5,000 contacts, social media advertisements on Facebook, and meeting flyers distributed at public venues in the Project Area. Meeting notices were mailed to 11,599 discrete addresses. A total of 328 people attended the Post-Scoping Meetings in November 2019.



*Community Workshop in Glendale*



*Community Workshop in Eagle Rock*



*Community Workshop in North Hollywood*



*Community Workshop in Pasadena*

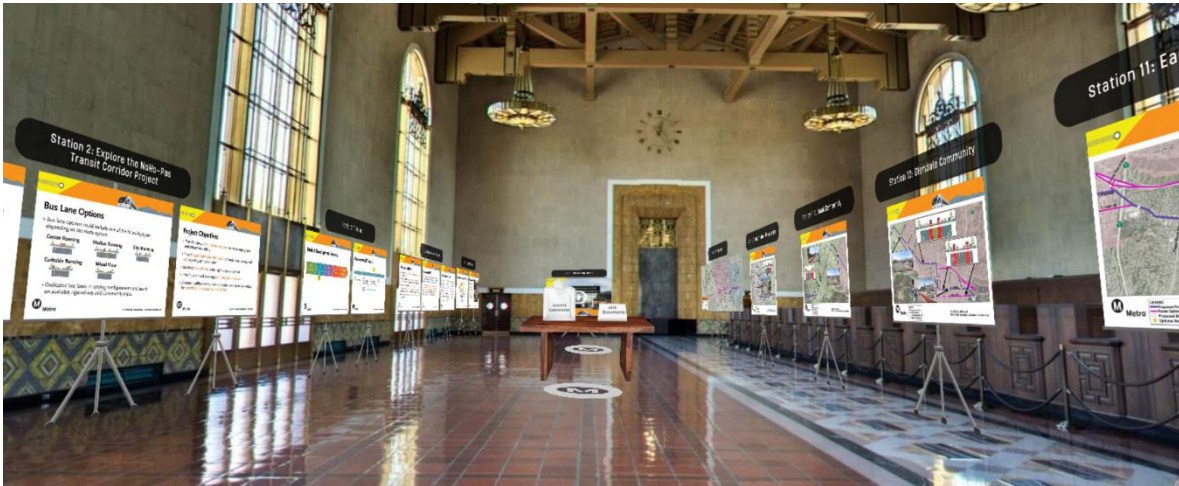


## Draft EIR Outreach (Fall 2020)

Following CEQA requirements, additional outreach was conducted at the completion of the DEIR.

The DEIR was released for public review and comment on October 26, 2020. The 64-day review period closed on December 28, 2020. Due to restrictions related to the ongoing COVID-19 pandemic, a traditional outreach process was not feasible. As a result, outreach was conducted virtually. Two online public scoping meetings were held on November 12 & 14, 2020. Simultaneous Spanish translation was made available during these meetings.

In addition, a Virtual Platform was developed to replicate the experience of a typical Metro open house meeting. Project information boards, a project update video (which can be accessed via [this link](#)), a full presentation on the DEIR, as well as direct links to the DEIR and to submit comments were provided in a virtual room. This Virtual Platform was available 24/7 during the entire comment period, enhancing the availability of project information.



*Virtual Platform*

## Conclusion

This analysis documents the Title VI Service Equity Analysis required to support the identification of a Proposed Project for the North Hollywood to Pasadena BRT Corridor Project. The Proposed Project is analyzed based on Metro's Title VI thresholds and FTA's Circular 4702.1B to determine whether the proposed new service will have a disparate impact or disproportionate burden on minority and low-income populations relative to non-low-income and non-minority populations. Based on the analysis conducted, it was found that there was no disparate impact to minority populations and no disproportionate burden to low-income populations when applying the Metro Board-approved policies.

In summary, this Title VI Service Equity Analysis concludes that the Project would prove beneficial and would not be selected without regard to race, color, or national origin. As the project continues to be designed and refined, components of the Proposed Project that could potentially negatively impact nearby communities will be analyzed for a potential disparate impact or disproportionate burden.