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Los Angeles County
Metropolitan Transportation Authority

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Title VI Service Equity Analysis

NextGen Bus Plan (Bus Network Design)

Fall 2020

Los Angeles County Metropolitan Transportation Authority

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Office of Civil Rights & Inclusion

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1. INTRODUCTION

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.

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.

1.1 Analysis Purpose

This report provides an equity evaluation of a proposed systemwide restructuring of Metro bus service termed NextGen. Conducted over the past two years with extensive public involvement the proposed program of changes is intended to increase the frequency of service to most riders and speed up the operation of the system. While reducing the number of bus stops will increase speeds on some services, the primary speed benefit will ultimately be achieved through a program of capital improvements designed to enhance the priority of bus service on major corridors. These will be introduced in later years of the phased implementation of the service changes.

The program is intended to begin implementation in December 2020, and will be phased in as a consequence of the impacts of the COVID-19 pandemic occurring in the spring of 2020. Ridership is expected to take some time to return to the levels of early 2020 so the restructuring program is expected to be implemented with reduced service frequencies which will be increased as ridership recovers.

2. Applicable Policy and Definitions

2.1 Metro's Title VI Major Service Change Policy

Metro's Board of Directors adopted a revised Title VI policy for major service changes in September 2019. The policy requires that "all changes in service meeting the definition of "Major Service Change" are subject to a Title VI Service Equity Analysis prior to Board approval of the service change. A Title VI Equity Analysis will be completed for all Major Service Changes and will be presented to the Board for its consideration and the results will be included in the subsequent Metro Title VI Program Update with a record of action taken by the Board."¹

For the 2019 FTA Title VI Program Update Major Service Change is defined as any service change meeting at least one of the following criteria:

¹ Los Angeles County Metropolitan Transportation Authority Mice Change Policy

1. A revision to an existing transit route that increases or decreases the route miles and/or the revenue miles operated by 25% or more at one time or cumulatively in any period within 36 consecutive months since the last major service change;
2. A revision to an existing transit service that increases or decreases the scheduled trips operated by at least 25% at one time or cumulatively in any period within 36 consecutive months since the last major service change;
3. An increase or decrease to the span of service of a transit line of at least 25% at any one time or cumulatively in any period within 36 consecutive months since the last major service change;
4. The implementation of a new transit route that provides at least 50% of its route miles without duplicating other routes;
5. Six months prior to the opening of any new fixed guideway project (e.g. BRT line or rail line) regardless of whether or not the amount of service being changed meets the requirements in the subsections 1 – 5 above to be inclusive of any bus/rail interface changes.

a. Experimental, demonstration or emergency service changes may be instituted for one year or less without a Title VI Equity Analysis being completed and considered by the Board of Directors. If the service is required to be operated beyond one year the Title VI Equity Analysis must be completed and considered by the Board of Directors before the end of the one year experimental, demonstration or emergency.

b. A Title VI Equity Analysis shall not be required if a Metro transit service is replaced by a different route, mode, or operator providing a service with the same headways, fare, transfer options, span of service and stops.

Policy definitions 1 through 4 were applicable to service changes in the NextGen program.

2.2 Definitions

The following terms are used in this document:

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 (5%) per Metro's Title VI Program which was updated and approved by Metro's Board in October 2019.

Disproportionate Burden: Disproportionate burden refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. 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 the percentage of low-income adversely affected by the service change and the overall percentage of low-income persons is at least five percent (5%) per Metro's Title VI Program which was updated and approved by Metro's Board in October 2019.

3. METHODOLOGICAL APPROACH

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 1,433-square-mile service area.² Collectively, Metro operates multiple rail and bus lines which consists of over 50 rail vehicles in a UZA over 200,000 in population. 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.

As Metro serves the core of Los Angeles County's population, and this analysis focuses on the population falling within the borders of Los Angeles County. County data was used to evaluate Metro's Service Area for this evaluation. County data was compiled using 2017 American Community Survey (ACS) ethnicity and income demographic data.

A Service Equity Evaluation is presented herein in accordance with the requirements of Federal Transit Administration Circular 4702.1B. The evaluation assesses whether there are adverse disparate impacts on minority passengers and/or disproportionate burdens on low income riders arising from the proposed service restructuring.

Only major service change proposals as defined in Metro's Transit Service Policy are required to be evaluated for adverse impacts. Three separate analyses have been conducted: (1) a line by line analysis to identify adverse impacts caused by changes to individual bus lines or groups of related lines serving a specific corridor; (2) a review by Day Type and Service Type to determine if adverse impacts result from changes to each type of service; and (3) a review by Service Council area to determine if there are geographical adverse impacts.

For the purpose of these analyses the following demographics were used as the service area minority and low income population shares (Table 3-1). The 2017 American Consumer Survey (ACS) provided the population, minority population, and low income household counts by tract. This was the most recent available data at the time that the NetPlan tool demographic data was populated. Total households were also

² Los Angeles County Metropolitan Transportation Authority, Title VI Program Update, October 2019

incorporated and the low income shares of total households were assumed to represent the low income population shares.

Table 3-1 Metro Service Area Demographic Breakdown

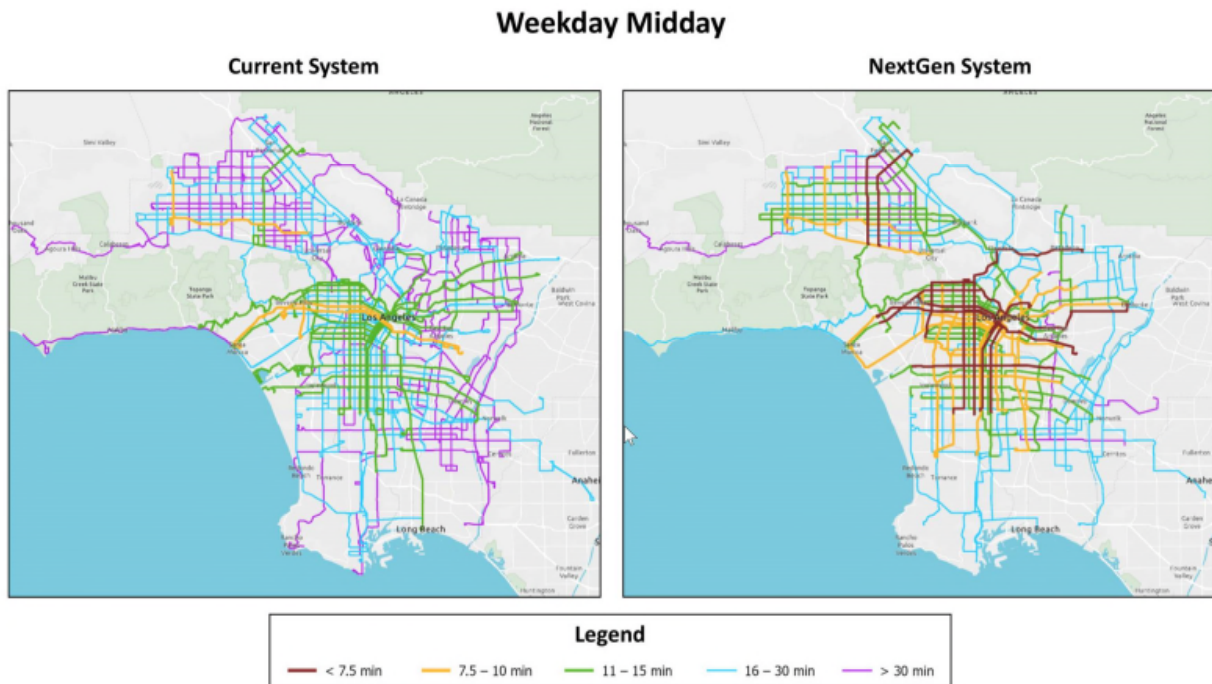
Total Population	Minority Population	Percent Minority	Low-Income Population	Percent Low-Income
10,105,722	7,428,740	73.5%	1,688,505	16.9%

Data is compiled from all tracts within one quarter mile of stops on each bus route. Service increases are considered beneficial and no adverse impact results. Service decreases, including route cancelations, are considered adverse, and if the minority share of impacted population is greater than 78.5% then a Disparate Impact is identified. For adversely impacted populations if the low income share exceeds 21.9% then a Disproportionate Burden is identified.

3.1 Existing and Proposed Service

Figure 3-1 depicts the existing fixed route bus system operated by Metro and the proposed NextGen fixed route system. Routes are color coded to indicate weekday midday service frequencies.

Figure 3-1 Before and After Fixed Route Services Maps



3.2 Methodological Tool

This analysis uses a tool (NetPlan) built into the HASTUS scheduling system. The Reference, or Baseline, descriptions of existing service by variant are defined. A variant

is a defined directional route or route segment operated by one or more trips on a bus line and includes bus stop locations served by the variant. By way of example a line might include end to end trips as well as some trips turned back at a short line terminal. Each of these would be a variant. The Planned service descriptions are also coded into NETPLAN by variant. Tract level Census data is also coded into NETPLAN consistent with the data identified in Table 3.1. Since income data is provided by Households we have used the low income share of Households in each tract as the low income population share.

A routine has been developed within NETPLAN to derive Title VI statistics from the Reference and Planned service descriptions. The statistics are computed by variant and aggregated to the line level. Each variant, both Reference and Planned, is defined by # of Trips Operated, In Service Hours Operated, In Service Miles Operated, and the Census variables Total Population, Minority Population, and Low Income Population. The demographic data associated with each variant is derived from aggregating the applicable data for all tracts touched by a one quarter mile buffer associated with each of the bus stops of the variant.

The impacted populations for each variant are represented by the difference between the Planned and Reference data. The NETPLAN routine weights these differences by the number of trips operated for the variant. Unlike traditional Title VI evaluations this approach gives greater weight to populations served by more frequent service. The results are then aggregated to the line level.

4. Line and Line Group Analysis

Tables 4-1, 4-2 and 4-3 provide the line and line group results for weekdays, Saturdays and Sunday/Holidays respectively. The columns are as follows:

Major Change – Only lines or line groups undergoing major changes have an entry in this column. The codes indicate major changes as follows:

Code	Description
Yes+	Major service increases and beneficial
New	New service and beneficial
Yes-	Major service decreases and adverse
Discontinue	Discontinued service and adverse

Line or Line Group - A line or group of related lines being evaluated.

Impacted Minority Trips % - The trip weighted minority share of the impacted population.

Impacted Low Income Trips % - The trip weighted low income share of the impacted population.

Comments - Indicates Disparate Impact if the minority share of an adverse service change exceeds 78.5%. Indicates Disproportionate Burden if the low income share of an adverse service change exceeds 21.9%.

Table 4-1

Weekday Results by Line or Line Group				
Major Change	Line or Line Group	Impacted Minority Trips % [Ref: 73.5%]	Impacted Low income Trips % [Ref: 16.9%]	Comments
Yes-	2, 200	30.41%	71.81%	Disproportionate Burden
	4, 704	50.12%	45.12%	
Yes+	10	82.92%	54.80%	
	14	64.35%	48.04%	
	16, 617	64.26%	58.71%	
	18, 20, 720	72.65%	52.98%	
	28, 684, 728	69.32%	37.24%	
	33, 733	69.23%	39.27%	
Yes+	35	89.32%	61.47%	
Yes-	40, 740	88.34%	41.98%	Disparate Impact & Disproportionate Burden
	45, 745	99.29%	73.03%	
	51	93.06%	70.03%	
Yes+	53	92.32%	61.78%	
Yes+	55	95.78%	64.61%	
	60, 760	97.62%	55.53%	
Yes+	62, 262	55.54%	117.90%	
Yes+	66, 605, 665	91.65%	64.80%	
	68, 70, 770	112.89%	57.70%	
Yes+	71, 106	103.38%	56.39%	
Yes+	76	84.34%	57.37%	
	78, 179	61.73%	27.71%	
	81	83.69%	58.25%	
Discontinue	83	82.83%	49.52%	Disparate Impact & Disproportionate Burden
Yes+	90, 290, 690	89.65%	38.65%	
	92	65.84%	43.89%	
Yes+	94, 294, 794	51.86%	40.86%	
Yes-	96, 296	64.38%	49.84%	Disproportionate Burden
	102	102.65%	63.31%	
	105, 705	67.28%	48.66%	
Yes+	108	110.89%	65.25%	
Yes+	110	89.42%	54.94%	

Weekday Results by Line or Line Group				
Major Change	Line or Line Group	Impacted Minority Trips % [Ref: 73.5%]	Impacted Low income Trips % [Ref: 16.9%]	Comments
Yes+	111	94.60%	52.94%	
	115	114.58%	55.64%	
	117	94.84%	49.52%	
Yes+	120, 621	97.19%	55.70%	
Yes+	125	88.54%	42.37%	
Discontinue	126	76.97%	39.87%	Disproportionate Burden
Yes+	127	95.99%	47.13%	
	128	82.57%	17.69%	
Yes+	130, 130A	95.07%	50.80%	
	134, 534	18.53%	25.97%	
	150, 240, 245, 750	52.30%	45.70%	
	152	0.67%	-6.80%	
Yes+	153, 154	48.81%	45.79%	
Yes-	155, 183	40.61%	49.20%	Disproportionate Burden
Yes+	158, 167	-164.71%	94.48%	
	161	10.03%	22.80%	
Yes+	162, 163	64.69%	45.09%	
Yes+	164	49.38%	41.66%	
	165	64.95%	45.80%	
	166	110.97%	53.08%	
Yes+	169, 645	73.99%	47.67%	
Discontinue	175	55.25%	49.22%	Disproportionate Burden
Yes+	176, 287	78.64%	37.70%	
Yes-	177	26.61%	12.59%	
Yes+	180, 780	40.39%	42.96%	
New	182	77.93%	45.59%	
Discontinue	201	63.08%	48.02%	Disproportionate Burden
Yes-	202	94.58%	51.74%	Disparate Impact & Disproportionate Burden
es+	204, 754	92.18%	65.84%	
	205	74.08%	52.68%	
Yes+	206	88.10%	60.83%	
	207, 757	98.31%	47.48%	
Yes-	209	92.66%	60.08%	Disparate Impact & Disproportionate Burden
Yes+	210, 610, 710	84.72%	41.88%	
Yes+	211	89.31%	48.64%	

Weekday Results by Line or Line Group				
Major Change	Line or Line Group	Impacted Minority Trips % [Ref: 73.5%]	Impacted Low income Trips % [Ref: 16.9%]	Comments
Yes+	212	80.43%	44.38%	
Discontinue	217	40.42%	40.83%	Disproportionate Burden
Yes-	218	19.26%	27.44%	Disproportionate Burden
Yes-	222, 237, 656	53.02%	46.37%	Disproportionate Burden
	224	76.53%	57.03%	
Yes+	230	68.17%	49.34%	
Yes+	232	58.13%	38.20%	
Yes+	233	80.42%	52.50%	
Yes+	234, 734	86.43%	50.37%	
Yes+	236	66.56%	70.84%	
Yes-	239	83.42%	35.36%	Disparate Impact & Disproportionate Burden
Yes+	243	58.06%	34.19%	
New	244	61.85%	36.06%	
	246	74.48%	38.29%	
Yes+	251, 751	97.26%	55.11%	
Discontinue	252	96.05%	59.17%	Disparate Impact & Disproportionate Burden
Discontinue	254	98.52%	60.22%	Disparate Impact & Disproportionate Burden
Yes+	256, 256A, 256C	72.05%	35.65%	
	258	292.66%	142.13%	
Yes+	260, 261, 660, 762	90.62%	50.91%	
Yes+	265	84.71%	36.81%	
Yes+	266	82.50%	36.52%	
Yes+	267, 662	64.30%	44.77%	
Yes-	268	49.35%	29.14%	Disproportionate Burden
	344	59.19%	28.25%	
Discontinue	442	86.06%	56.63%	Disparate Impact & Disproportionate Burden
New	450	81.45%	55.44%	
	460	80.09%	49.18%	
Yes+	487	79.47%	65.87%	
Yes-	501	116.38%	-42.78%	Disparate Impact
Yes-	550	74.87%	49.49%	Disproportionate Burden
Yes+	577	72.35%	-7.80%	
Yes-	601	48.68%	37.07%	Disproportionate Burden
	602	33.42%	35.99%	

Weekday Results by Line or Line Group				
Major Change	Line or Line Group	Impacted Minority Trips % [Ref: 73.5%]	Impacted Low income Trips % [Ref: 16.9%]	Comments
Yes+	603	82.70%	59.54%	
Discontinue	607	92.25%	46.89%	Disparate Impact & Disproportionate Burden
Yes-	611	97.99%	57.28%	Disparate Impact & Disproportionate Burden
Discontinue	612	97.52%	54.10%	Disparate Impact & Disproportionate Burden
Discontinue	625	34.01%	21.38%	
Discontinue	685	57.48%	43.35%	Disproportionate Burden
New	686	47.72%	28.97%	
Discontinue	687	57.45%	34.52%	Disproportionate Burden
Discontinue	744	71.61%	47.91%	Disproportionate Burden
Yes+	761, 788	63.99%	45.11%	
	901	59.32%	45.70%	
	910	64.15%	21.80%	

Table 4-2

Saturday Results by Line or Line Group				
Major Change	Line or Line Group	Impacted Minority Trips % [Ref: 73.5%]	Impacted Low income Trips % [Ref: 16.9%]	COMMENTS
Yes-	2, 200	445.96%	51.05%	Disparate Impact & Disproportionate Burden
	4, 704	51.71%	45.50%	
	10	78.67%	53.11%	
	14	10.70%	27.33%	
	16, 617	69.92%	49.56%	
	18, 20, 720	79.09%	55.05%	
Yes+	28, 684, 728	105.41%	54.84%	
Yes-	30	80.70%	55.96%	Disparate Impact & Disproportionate Burden
	33, 733	69.85%	41.15%	
Yes+	35	89.41%	61.51%	
Yes-	40, 740	88.90%	44.83%	Disparate Impact & Disproportionate Burden
	45, 745	99.39%	75.54%	
	51	93.36%	68.65%	

Saturday Results by Line or Line Group				
Major Change	Line or Line Group	Impacted Minority Trips % [Ref: 73.5%]	Impacted Low income Trips % [Ref: 16.9%]	COMMENTS
	53	92.07%	41.70%	
	55	100.14%	70.92%	
	60, 760	4367.49%	-875.12%	
Yes+	62, 262	74.92%	65.49%	
	66, 605, 665	91.93%	68.97%	
Yes+	68, 70, 770	99.19%	54.36%	
Yes+	71, 106	100.35%	56.13%	
	76	145.10%	-48.83%	
Yes-	78, 179	79.06%	42.81%	Disparate Impact & Disproportionate Burden
	81	75.71%	53.72%	
Discontinue	83	82.77%	49.42%	Disparate Impact & Disproportionate Burden
Yes+	90, 290, 690	86.68%	39.99%	
	92	78.61%	42.05%	
Yes+	94, 294, 794	32.77%	31.02%	
Yes-	96, 296	72.30%	56.19%	Disproportionate Burden
	102	104.99%	61.94%	
	105, 705	63.82%	47.48%	
	108	129.70%	76.39%	
	110	83.33%	56.45%	
Yes+	111	89.14%	41.55%	
	115	119.55%	60.90%	
	117	97.42%	55.84%	
Yes+	120, 621	90.82%	44.43%	
Yes+	125	89.01%	42.60%	
	126			
New	127	94.09%	46.39%	
New	128	89.80%	42.05%	
Yes+	130, 130A	75.65%	38.89%	
	134, 534	19.38%	26.52%	
	150, 240, 245, 750	60.97%	50.16%	
Yes+	152	130.50%	86.52%	
New	153, 154	48.59%	42.98%	
Yes-	155, 183	36.58%	38.74%	Disproportionate Burden
	158, 167	91.22%	44.06%	
	161	102.15%	36.49%	

Saturday Results by Line or Line Group				
Major Change	Line or Line Group	Impacted Minority Trips % [Ref: 73.5%]	Impacted Low income Trips % [Ref: 16.9%]	COMMENTS
Yes+	162, 163	62.17%	43.91%	
	164	67.19%	48.30%	
Yes+	165	66.25%	46.54%	
Yes+	166	89.89%	45.42%	
New	169, 645	75.25%	44.59%	
	175			
New	176, 287	84.43%	42.95%	
	177			
Yes+	180, 780	33.01%	40.09%	
New	182	77.93%	45.59%	
Discontinue	201	63.21%	48.16%	Disproportionate Burden
	202			
	204, 754	93.00%	66.07%	
Yes+	205	79.84%	44.12%	
Yes+	206	88.22%	60.79%	
Yes+	207, 757	94.86%	57.02%	
	209			
Yes+	210, 610, 710	85.11%	45.42%	
New	211	88.40%	47.64%	
Yes+	212	80.26%	42.99%	
Discontinue	217	38.93%	41.80%	Disproportionate Burden
Yes-	218	19.34%	27.23%	Disproportionate Burden
Yes-	222, 237, 656	41.01%	45.86%	Disproportionate Burden
	224	44.09%	25.11%	
	230	74.72%	42.54%	
	232	60.36%	39.03%	
Yes+	233	81.28%	52.61%	
Yes+	234, 734	82.04%	49.48%	
Yes+	236	66.35%	64.29%	
New	239	49.63%	38.07%	
	243	62.33%	41.31%	
New	244	61.85%	36.06%	
	246	89.34%	47.11%	
	251, 751	97.14%	51.37%	
Discontinue	252	96.80%	60.47%	Disparate Impact & Disproportionate Burden

Saturday Results by Line or Line Group				
Major Change	Line or Line Group	Impacted Minority Trips % [Ref: 73.5%]	Impacted Low income Trips % [Ref: 16.9%]	COMMENTS
Discontinue	254	98.52%	60.22%	Disparate Impact & Disproportionate Burden
Yes+	256, 256A, 256C	59.38%	35.53%	
New	258	89.80%	46.83%	
Yes+	260, 261, 660, 762	90.37%	50.80%	
Yes+	265	84.71%	36.81%	
Yes+	266	82.49%	36.50%	
Yes+	267, 662	67.88%	42.21%	
Yes-	268	56.15%	30.90%	Disproportionate Burden
	344	58.77%	27.96%	
	442			
New	450	79.76%	51.51%	
	460	79.82%	48.76%	
Yes-	487	77.32%	52.37%	Disproportionate Burden
	501	41.71%	48.79%	
Discontinue	550	72.43%	42.84%	Disproportionate Burden
	577			
Yes-	601	48.62%	37.04%	Disproportionate Burden
	602	1.15%	10.41%	
	603	80.90%	56.81%	
	607			
Yes-	611	97.99%	57.31%	Disparate Impact & Disproportionate Burden
Discontinue	612	97.52%	54.10%	Disparate Impact & Disproportionate Burden
	625			
	685			
New	686	47.72%	28.97%	
Discontinue	687	57.32%	34.43%	Disproportionate Burden
Discontinue	744	79.03%	50.86%	Disparate Impact & Disproportionate Burden
New	761, 788	66.53%	46.90%	
	901	66.30%	46.55%	
	910	77.94%	48.57%	

Table 4-3

Sunday/Holiday Results by Line or Line Group				
Major Change	Line or Line Group	Impacted Minority Trips % [Ref: 73.5%]	Impacted Low income Trips % [Ref: 16.9%]	COMMENTS
Yes-	2, 200	44.14%	54.83%	Disproportionate Burden
Yes+	4, 704	52.12%	45.11%	
Yes+	10	86.19%	57.20%	
	14	185.14%	97.02%	
Yes+	16, 617	74.10%	52.64%	
Yes+	18, 20, 720	76.39%	54.94%	
Yes-	28, 684, 728	495.96%	106.91%	Disparate Impact & Disproportionate Burden
Yes-	30	80.13%	55.55%	Disparate Impact & Disproportionate Burden
	33, 733	70.72%	43.09%	
Yes+	35	90.24%	60.79%	
Yes+	40, 740	87.66%	40.17%	
Yes+	45, 745	93.30%	66.60%	
	51	92.85%	72.58%	
Yes+	53	92.97%	58.67%	
Yes+	55	94.34%	64.55%	
Yes+	60, 760	92.27%	57.80%	
Yes-	62, 262	64.03%	86.01%	Disproportionate Burden
Yes+	66, 605, 665	91.12%	65.89%	
	68, 70, 770	101.26%	55.43%	
Yes+	71, 106	100.35%	56.13%	
	76	80.14%	64.75%	
	78, 179	75.80%	40.48%	
Yes+	81	81.64%	56.68%	
Discontinue	83	82.77%	49.43%	Disparate Impact & Disproportionate Burden
Yes+	90, 290, 690	80.86%	41.71%	
Yes+	92	63.40%	44.71%	
Yes+	94, 294, 794	52.15%	38.62%	
Yes+	96, 296	100.49%	78.79%	
	102	104.99%	61.94%	
Yes+	105, 705	72.99%	51.85%	
Yes+	108	110.03%	64.89%	
Yes+	110	85.90%	52.62%	
Yes+	111	90.31%	43.95%	
Yes+	115	107.72%	56.32%	

Sunday/Holiday Results by Line or Line Group				
Major Change	Line or Line Group	Impacted Minority Trips % [Ref: 73.5%]	Impacted Low income Trips % [Ref: 16.9%]	COMMENTS
	117	93.70%	46.43%	
Yes+	120, 621	90.82%	44.43%	
Yes+	125	89.41%	42.80%	
	126			
New	127	94.09%	46.39%	
New	128	89.80%	42.05%	
Yes+	130, 130A	75.65%	38.89%	
Yes+	134, 534	18.59%	25.95%	
Yes+	150, 240, 245, 750	53.88%	40.53%	
Yes+	152	92.43%	58.36%	
New	153, 154	48.59%	42.98%	
Yes-	155, 183	41.33%	43.07%	Disproportionate Burden
	158, 167	100.53%	47.70%	
Yes+	161	41.41%	26.83%	
Yes+	162, 163	65.50%	45.25%	
Yes+	164	63.37%	45.41%	
Yes+	165	65.59%	46.16%	
Yes+	166	85.40%	43.62%	
New	169, 645	75.25%	44.59%	
	175			
New	176, 287	84.43%	42.95%	
	177			
Yes+	180, 780	34.43%	40.75%	
New	182	77.93%	45.59%	
Discontinue	201	63.21%	48.16%	Disproportionate Burden
	202			
Yes+	204, 754	92.11%	65.88%	
	205	79.55%	44.78%	
Yes+	206	88.29%	60.83%	
Yes+	207, 757	91.81%	56.83%	
	209			
Yes+	210, 610, 710	85.79%	46.16%	
New	211	88.40%	47.64%	
Yes+	212	77.58%	44.30%	
Discontinue	217	39.03%	42.04%	Disproportionate Burden
Yes-	218	19.44%	26.84%	Disproportionate Burden

Sunday/Holiday Results by Line or Line Group				
Major Change	Line or Line Group	Impacted Minority Trips % [Ref: 73.5%]	Impacted Low income Trips % [Ref: 16.9%]	COMMENTS
Yes-	222, 237, 656	41.01%	45.86%	Disproportionate Burden
	224	56.36%	64.18%	
Yes+	230	74.62%	42.66%	
	232	59.94%	38.89%	
Yes+	233	81.50%	52.52%	
Yes+	234, 734	81.34%	48.85%	
Yes+	236	66.35%	64.29%	
New	239	49.63%	38.07%	
New	243	56.94%	32.03%	
New	244	61.85%	36.06%	
	246	78.12%	42.67%	
Yes+	251, 751	97.14%	56.05%	
Discontinue	252	96.80%	60.47%	Disparate Impact & Disproportionate Burden
	254			
Yes+	256, 256A, 256C	68.42%	38.40%	
New	258	89.80%	46.83%	
Yes+	260, 261, 660, 762	89.98%	49.67%	
Yes+	265	84.71%	36.81%	
Yes+	266	82.54%	36.53%	
Yes+	267, 662	67.88%	42.21%	
Yes-	268	56.15%	30.90%	Disproportionate Burden
	344	58.72%	27.92%	
	442			
New	450	79.76%	51.51%	
	460	79.72%	48.73%	
Yes-	487	77.39%	52.13%	Disproportionate Burden
	501	41.71%	48.79%	
Discontinue	550	72.43%	42.84%	Disproportionate Burden
	577			
Yes-	601	48.62%	37.04%	Disproportionate Burden
Yes+	602	27.19%	30.06%	
	603	82.29%	58.74%	
	607			
Yes-	611	97.99%	57.31%	Disparate Impact & Disproportionate Burden

Sunday/Holiday Results by Line or Line Group				
Major Change	Line or Line Group	Impacted Minority Trips % [Ref: 73.5%]	Impacted Low income Trips % [Ref: 16.9%]	COMMENTS
Discontinue	612	97.52%	54.10%	Disparate Impact & Disproportionate Burden
	625			
	685			
New	686	47.72%	28.97%	
Discontinue	687	57.32%	34.43%	Disproportionate Burden
Discontinue	744	79.03%	50.86%	Disparate Impact & Disproportionate Burden
New	761, 788	66.53%	46.90%	
	901	66.30%	46.55%	
	910	77.94%	48.57%	

4.1 Disparate Impacts for Line or Line Groups

The NextGen proposals impact 112 bus lines or line groups of which 17 would experience a Disparate Impact to minority riders on one or more day types (Weekdays, Saturdays, and Sunday/Holidays). Each of these changes has been proposed consistent with the objectives of the system restructuring which include more frequent local service, improved connectivity, improved cost effectiveness, and inclusion of alternative services in areas of low demand. The services experiencing Disparate Impacts are identified in Table 4-4. The table shows the day types impacted and alternative services that would be available to impacted riders.

Table 4-4

Services Experiencing Disparate Impacts		
Line/ Line Group	Day Type	Alternatives
2/200	Saturday	Lines 2 and 4
28/684/728	Sunday	New Line 684, frequent L Line Gold, Bus Line 81
30	Saturday, Sunday	Frequent network (westside)/L line Gold/Bus Line 106
40/740	Weekday, Saturday	Lines 40, 212
78/179	Saturday	Lines 78, 179 commensurate with demand
83	All	L Line Gold, Bus Lines 81 and new Line 182
202	Weekday	Line 202 (Artesia-Willowbrook + Lines 205, 232, 246 + Long Beach Transit Lines 1, 52, 191, 192
209	Weekday	Line 209 (144 th /Crenshaw-Crenshaw Expo Line + Line 210
239	Weekday	Line 239 (Ventura-Rinaldi) + Line 236 San Fernando Mission
252	All	Lines 182, 251, MicroTransit (Lincoln Heights)

Services Experiencing Disparate Impacts		
Line/ Line Group	Day Type	Alternatives
254	Weekday, Saturday	Frequent network proximity (Lines 55, 60, 110, 111, 115, 117, 251, 605, 665), new MicroTransit
442	Weekday	Frequent Lines 115, C Line Green connecting to J Line (Silver)
501	Weekday	Frequency adjusted consistent with demand
607	Weekday	New MicroTransit
611	All	New Line 611, extended Line 102, overlap or proximity of Lines 55, 60, 105, 111, 260
612	All	Frequent network proximity (Lines 55, 60, 111, 115, 117, 251, 260, 261), new MicroTransit
744	Saturday, Sunday	Lines 233, 240, 761

4.2 Disproportionate Burdens for Lines or Line Groups

The NextGen proposals impact 112 bus lines or line groups of which 31 would experience a Disproportionate Burden to low income riders on one or more day types (Weekdays, Saturdays, and Sunday/Holidays). Each of these changes has been proposed consistent with the objectives of the system restructuring which include more frequent local service, improved connectivity, improved cost effectiveness, and inclusion of alternative services in areas of low demand.

With the exception of Lines 177 and 625 on weekdays, every line or line group proposed for significant service reductions would experience a Disproportionate Burden on low income riders. This is largely a consequence of the fact that much of Metro's fixed route service operates in corridors that have a larger share of low income residents than the service area as a whole. Lines experiencing both a Disparate Impact and a Disproportionate Burden are presented in Table 4-4 along with lines experiencing only Disparate Impacts. The lines and line groups experiencing only a Disproportionate Burden along with their alternative services are identified in Table 4-5.

Table 4.5

Services Experiencing Only Disproportionate Burdens		
Line/ Line Group	Day Type	Alternatives
96, 296	Weekday, Saturday	Line 96 alignment would be retained between Burbank and Riverside/Figueroa, then via Figueroa St to the Lincoln/Cypress L Line (Gold) station. Connections would also be available with Line 81 to downtown LA. Hourly service would be retained. The line would be renumbered 296 consistent with Metro line numbering convention.
126	Weekday	Line 126 would be discontinued. This service operates weekday peak periods only with very low utilization. Frequent all-day all -week Lines 125, 210, 212, 215, and 232 as well as Torrance Transit Line 8, G-Trans Line 5, Beach Cities Transit Line 109 and LADOT Commuter Express Line 438 would serve the areas served by Line 126.

Services Experiencing Only Disproportionate Burdens		
Line/ Line Group	Day Type	Alternatives
155, 183	All	Lines 155 and 183 would be combined as new Line 155 between Universal City and North Hollywood Stations maintaining existing coverage on Tujunga, Riverside, and Magnolia. Line 155 service on Olive would be replaced by frequent Burbank Bus Pink Line service which is much more frequent than Line 155. Line 183 east of North Hollywood Station would be replaced by more frequent Line 94 service. Lower usage segment of Line 183 between Burbank and Glendale would have alternative service such as Metro Lines 94 and 92 in Burbank and Lines 92, 94, 180, and 290 in Glendale on the same street or within less than 0.25 mile, excepting eastern parts of Glendale where Metro MicroTransit service would be available.
201	All	Line 201 would be discontinued. This line operates hourly and has very low ridership and productivity. Ridership is especially low in the Silver Lake area and no replacement service is proposed on Silver Lake Bl. Nearest alternative services would be new Line 2 (Sunset Bl/Alvarado St), and new Line 182 (Rowena Av). In the central Glendale area alternative services Line 92 (Brand Bl/Glendale Av), Line 94 (Broadway, Brand Bl, San Fernando Rd), Line 180 (Broadway, Central Av), and Line 603 (San Fernando Rd) either duplicate this service or are with a 0.25 mile walk. In Glendale northeast of San Fernando Rd, Metro new MicroTransit on demand service will have a zone that includes Chevy Chase and Glendale Adventist Medical Center.
217	All	Lines 180, 181, 217, and 780 would be consolidated as one high frequency Line 180 service linking West LA/Expo Line, Hollywood, Glendale, Eagle Rock, and Pasadena via the existing Line 217 and 780 alignment on Fairfax Av, Hollywood Bl, and Colorado Bl via the current Line 180/780 alignment to Glendale, Eagle Rock, and Pasadena. All bus stops on the corridor would receive high frequency service, with bus speed improvement tools such as stop rationalization, bus lanes, and transit signal priority being deployed to maintain competitive on-board travel times. The combination of the frequency, access and speed improvements would provide competitive average travel times for existing and potential future riders. In Glendale, service on Central Av would be relocated to Brand Bl and would continue to serve Broadway, while in Eagle Rock and Pasadena Line 180 would operate via the existing alignment on Colorado Bl, terminating at Pasadena City College. Line 181 service on Yosemite Dr in Eagle Rock would be replaced by Line 81 and service on Colorado Bl east of Pasadena City College would continue to be served by Foothill Transit Line 187. Line 180 service on Lake Av in Pasadena would be replaced by new Metro Line 662. Line 217 service south of the Expo Line where utilization is low would be replaced by Culver CityBus Lines 4 and 6 and Metro Line 108.
218	All	Line 218 would continue to operate its existing alignment from Ventura Bl through Laurel Canyon and Crescent Heights to Fairfax & Santa Monica. Lines 4 and 180 would be available for connections to

Services Experiencing Only Disproportionate Burdens		
Line/ Line Group	Day Type	Alternatives
		destinations west and south of this location, as well as West Hollywood CityRide for connecting service to Beverly Center/Cedars Sinai Medical Center, replacing Line 218 on Fairfax Av and 3rd St. Service frequency would be commensurate with existing utilization, with Line 240 connecting to B Line (Red) rail service to Hollywood with connections to Line 180 also being a faster alternative service for some riders.
222, 237, 656	All	<p>Line 222 would still serve Hollywood Wy south of Vanowen St then be realigned to serve Riverside Dr and Vineland Av to Universal City Station (a more direct connection to this important hub) and Cahuenga Bl to Universal Studios Dr (replacing Line 237). The Line would have improved weekday and evening service frequency. Service between Universal City Station and Hollywood would be available on the B Line (Red) rail service while Line 222 service on Sunland Bl would be replaced by new Line 290, and Line 294 would serve Hollywood Wy area beside Burbank Airport. Service would not be retained on the low utilization segment of Line 222 on Cahuenga Bl, Barham Bl, Olive Av segment south of Riverside Dr.</p> <p>Line 237 would continue to operate on Woodley Av between the Metro G Line Orange BRT and Rinaldi St. Line 237 on Burbank Bl between Van Nuys Bl and Whitsett would be served by Line 154 which would continue via Burbank Bl rather than Chandler Bl that Line 237 operates on today. Line 224 would replace Line 237 on Lankershim Bl, while Line 222 would replace Line 237 on Vineland Av south of Riverside Dr and a segment of Cahuenga Bl south to Universal Studios Dr. Line 237 south of there to Hollywood would not be replaced with bus service through Cahuenga Pass though B Line (Red) rail service would be available between Universal Station and Hollywood.</p> <p>Line 656 overnight Owl service would be modified to operate a modified route from Normandie Av/Santa Monica Bl through Hollywood and Cahuenga Bl and Lankershim Bl to North Hollywood Station. Line 656 service north of North Hollywood Station would be replaced by new Line 162 and 234 overnight Owl services on Sherman Wy and Sepulveda Bl respectively as well as continued Line 901 G Line (Orange) and Line 233 Van Nuys Bl Owl service.</p>
268	All	Line 268 would discontinue service north of Foothill Bl on Baldwin, Sierra Madre, & Michillinda maintaining service on Foothill Bl between El Monte Station and the L Line (Gold) Sierra Madre Villa Station. Line 268 segment from Sierra Madre Villa Station and Pasadena/Altadena/Jet Propulsion Lab would be replaced by Line 256 on Altadena Bl & Washington Bl. Service north of Washington Bl and on Lincoln Bl. would be replaced by Line 662. New Metro MicroTransit would be available to Jet Propulsion Lab from the Cities of Pasadena, Altadena, and Sierra Madre.

Services Experiencing Only Disproportionate Burdens		
Line/ Line Group	Day Type	Alternatives
487	Saturday, Sunday	Lines 487 (during peak period) and 489 would be modified to terminate at 7th/Metro area in downtown LA, discontinuing their low utilization extension to Westlake/MacArthur Park which can be reached with connecting B/D Line (Red/Purple) rail service and Line 20 or 720 (weekday peak only). Off-peak period Line 487 would terminate service at the Union Station. Line 487 would be altered to terminate at its eastern end at Sierra Madre Villa Station. Line 487 segment between Sierra Madre Villa Station and Arcadia Station, which has low utilization, would be replaced by new Metro MicroTransit on demand service. Line 487 segment between Arcadia Station and El Monte Station via Santa Anita Av would be replaced by new Line 287. Line 487 would have improved weekday frequency.
550	All	The Line 550 segment between Harbor Gateway Transit Center and USC via the Harbor Transitway would be retained peak periods weekdays, while the segment between San Pedro and Harbor Gateway Transit Center would be replaced in San Pedro by DASH on Gaffey St and 13th St, Line 205 on 7th St, and Line 246 (rerouted to serve Gaffey St between Channel St and Anaheim St). North of Pacific Coast Highway, Line 205 and Torrance Transit would serve Vermont Av in place of Line 550.
601	All	Line 601 would not change alignment but would continue to operate weekdays and weekends with still frequent 15 min. service rather than the 10 min. service daytime today, due to underutilization. The overnight Owl service on this line would also be discontinued due to very low ridership.
685	Weekday	Line 685 weekday only service would be discontinued due to low productivity as a result of low utilization. New MicroTransit serves as a replacement service and operates 7 days a week, with Line 290 also maintaining service to Glendale Community College.
687	All	Line 687 would be discontinued with replacement service available on new Line 662 on Los Robles Av south of Washington Bl to Del Mar L Line (Gold) Station. Due to low utilization, the service on Los Robles Av north of Washington Bl would be replaced new Metro MicroTransit service with connections to Pasadena, with alternative service also available on Line 260 (Fair Oaks Av) and Line 662 (Lake Av).

5. Service Type Analysis

In addition to the line and line groups analysis an analysis was performed by service type. The collective changes for all lines of each service type were evaluated to determine whether in combination they resulted in a significant service change, and if such changes were adverse.

The results of this analysis are shown in Tables 5-1, 5-2 and 5-3 for the respective day types of Weekdays, Saturdays, and Sunday/Holidays. The thresholds shown in the

tables are the values that must be exceeded for adverse impacts to be classified as Disparate Impacts or Disproportionate Burdens.

Table 5-1 Weekday Impacts by Service Type

Service Type	Major Change	Type of Change	Impacted Riders	
			Minority Percent	Low Income Percent
Local	Sig+	Increase	80.29%	53.26%
Express			76.10%	53.10%
Shuttle	Sig+	Increase	54.78%	35.68%
Rapid	Sig-	Decrease	74.18%	51.56%
BRT			56.26%	60.90%
All Bus			83.93%	53.84%
Thresholds			78.5%	21.9%

Table 5-2 Saturday Impacts by Service Type

Service Type	Major Change	Type of Change	Impacted Riders	
			Minority Percent	Low Income Percent
Local			79.65%	51.81%
Express			85.87%	45.06%
Shuttle	Sig+	Increase	43.56%	20.38%
Rapid	Sig-	Decrease	73.76%	53.16%
BRT			54.90%	44.57%
All Bus	Yes	Increase	81.74%	49.52%
Thresholds			78.5%	21.9%

Table 5-3 Sunday/Holiday Impacts by Service Type

Service Type	Major Change	Type of Change	Impacted Riders	
			Minority Percent	Low Income Percent
Local	Sig+	Increase	79.38%	52.45%
Express	Sig+	Increase	88.72%	43.06%
Shuttle	Sig+	Increase	51.20%	28.56%
Rapid	Sig-	Decrease	70.93%	52.81%
BRT			54.90%	44.57%
All Bus	Sig+	Increase	80.25%	51.79%
Thresholds			78.5%	21.9%

5.1 Disparate Impacts by Service Type

Only the Rapid Bus service type experienced significant service reductions, and none of those resulted in a Disparate Impact to minorities.

5.2 Disproportionate Burdens by Service Type

Only the Rapid Bus service type experienced significant service reductions for each day type, and all of these resulted in Disproportionate Burdens on low income populations. In every case reductions in Rapid Bus service were combined with increases in Local services so that all riders in each corridor will see increased service frequencies not just those served by Rapid bus stops.

6. Service Council Area Analysis

An additional analysis was performed by Service Council area to determine if there were adverse geographic consequences from the NextGen proposals. The collective changes for all lines within each Service Council area were evaluated to determine whether in combination they resulted in a significant service change, and if such changes were adverse.

The results of this analysis are shown in Tables 6-1, 6-2 and 6-3 for the respective day types of Weekdays, Saturdays, and Sunday/Holidays. The thresholds shown in the tables are the values that must be exceeded for adverse impacts to be classified as Disparate Impacts or Disproportionate Burdens.

Table 6-1 Weekday Impacts by Service Council Area

Service Council	Major Change	Type of Change	Impacted Riders	
			Minority Percent	Low Income Percent
Gateway			94.88%	49.52%
South Bay			89.28%	54.48%
SFV			77.77%	49.48%
SGV			61.61%	48.35%
Westside			101.66%	66.51%
All Bus			83.93%	53.84%
Thresholds			78.5%	21.9%

Table 6-2 Saturday Impacts by Service Council Area

Service Council	Major Change	Type of Change	Impacted Riders	
			Minority Percent	Low Income Percent
Gateway			86.18%	20.51%
South Bay			89.39%	44.57%
SFV			77.68%	47.83%
SGV			78.65%	49.90%
Westside			84.76%	58.72%
All Bus		Increase	81.74%	49.52%
Thresholds			78.5%	21.9%

Table 6-3 Sunday/Holiday Impacts by Service Council Area

Service Council	Major Change	Type of Change	Impacted Riders	
			Minority Percent	Low Income Percent
Gateway	Sig+	Increase	89.72%	46.94%
South Bay	Sig+	Increase	88.09%	53.27%
SFV	Sig+	Increase	72.67%	46.14%
SGV			78.90%	49.04%
Westside			79.45%	56.36%
All Bus	Sig+	Increase	80.25%	51.79%
Thresholds			78.5%	21.9%

6.1 Disparate Impacts by Service Council Area

As no Service Council area experienced a significant decline in service there are no Disparate Impacts by Service Council area.

6.2 Disproportionate Burdens by Service Council Area

As no Service Council area experienced a significant decline in service there are no Disproportionate Burdens by Service Council area.

7. Public Outreach

The NextGen Bus Study has been conducted around a firm foundation of rider, community, and stakeholder engagement since the study began in mid-2017, during initial input and data gathering, analysis, and findings phases through to the draft Bus Plan. This has included:

- 330+ partnerships with community and stakeholder groups
- 400+ stakeholder meetings, community events, and public workshops
- 64,000 webpage visits
- 25,000+ virtual workshop views
- 16,000+ constructive and positive comments received
- 8.9 million digital and print as impressions
- 12,000+ on-line survey responses

595,000+ Metro take-one brochures delivered to on transit lines, schools, libraries, community centers and city halls

Of particular significance is the 9 meetings held with the NextGen External Working Group of stakeholders formed to advise the project. This working group consists of 61 members representing a variety of stakeholder groups and community organizations throughout LA County, including groups such as Service Councils, Advisory Councils,

Business and Community Organizations, Chambers of Commerce, Educational Institutions, Government Agencies, Non-Profit, Faith-Based Institutions, Transportation Agencies, Transportation Services and Groups and Union Groups providing a diverse representation of the community.

In January 2020, the Metro Board of Directors authorized staff to release the draft NextGen Bus Plan for public review. A series of 15 public workshops were conducted in February/March prior to COVID-19 ending that in person effort (23 workshops were originally scheduled), with an ongoing active on-line presence continuing for the project since then. The workshops were held as follows:

- Feb. 1 @ 10am: Los Angeles Trade Technical College
- Feb. 4 @ 4pm: Grand Annex Wilmington
- Feb. 5 @ 4pm: Marvin Braude Constituent Center Van Nuys
- Feb. 10 @ 4pm: El Monte Station
- Feb. 12 @ 4pm: Plummer Park West Hollywood
- Feb. 13 @ 4pm: Clearwater Building Paramount
- Feb. 19 @ 4pm: East Los Angeles College
- Feb. 20 @ 4pm: Pasadena Senior Center
- Feb. 22 @ 10am: Los Angeles Metro Headquarters
- Feb. 25 @ 4pm: Bell Community Center
- Feb. 26 @ 4pm: The Foundation Center, Western Ave near Imperial Ave
- Feb. 27 @ 4pm: Rose Goldwater Community Center Canoga Park
- Mar. 5 @ 4pm: Norwalk Arts & Sports Complex
- Mar. 7 @ 10am: Providence Wellness Center
- Mar. 11 @ 4pm: Asian Youth Center San Gabriel

Total attendance at these workshops was 1,025. Staff received over 1,500 constructive comments that helped staff update the plan with 18 significant changes addressing concerns primarily with segments or lines that had been proposed for elimination.

A revised draft Bus Plan was issued to July 2020. Details were provided in an on-line booklet as well as a summary booklet distributed on board buses and trains and by staff at key transit hubs in the lead up to six public hearings. The same details contained in the summary booklet were provided for the public hearings.

Notice of intent to hold this public hearing with the required 30-days of notice was published in the following publications:

- Armenian Media Network
- Asian Journal (L.A.)
- Korea Times
- La Opinión
- Los Angeles Times
- Los Angeles Sentinel
- Panorama (Russian)

- Pasadena Star News
- Rafu Shimpo (Japanese)
- South Bay Daily Breeze
- Watts Times
- World Journal (Chinese Daily News)

Information regarding the public hearings was also shared via Facebook, Nextdoor, Twitter, and Metro’s blog, The Source.

There were also a number of groups subscribing to the NextGen project that received alerts for the public hearings as follows:

- NextGen Public Workshops list of 4,978 subscribers (6 separate email alerts sent)
- NextGen City Officials list of 162 subscribers (2 separate email alerts)
- NextGen External Working Group list of 140 subscribers (5 separate emails sent)
- Service Councils public mailing list of 423 subscribers (two emails sent)

Approximately 23,000 take one leaflets were distributed aboard Metro buses and over 4,000 take ones were distributed at major transit hubs.

Information regarding the hearings was also shared by la.streetsblog.org, on the Cal State LA, City of Malibu, City of Lynwood, and City of Vernon websites, in online community papers such as Larchmont Buzz and Malibu Times, and by local neighborhood Councils including North Hills West and Los Feliz Neighborhood Councils.

Table 7-1 provides a summary attendance at the public hearings and Table 7-2 provides a summary of unduplicated comments received during the public comment period from July 1, 2020 to August 27, 2020

Table 7-1 Summary of Public Hearing Participation

Next Gen Public Hearing Participation	Listened by Phone	Viewed Livestream	Viewed Archive
San Fernando Valley 8/19	8	91	5
South Bay Cities 8/20	8	27	21
All Regions 8/22	19	64	21
San Gabriel Valley 8/24	8	107	16
Westside Central 8/26	20	102	0
Gateway Cities 8/27	13	70	5
Totals	60	461	68
Total Participation			589

Table 7-2 Summary of Feedback Received During Public Comment Period of July 1, 2020 to August 27, 2020

Method	Number Received
Phone	27
eComments during hearings	118
Email	128
Virtual Workshop	14
USPS	5
Total Comments Received	292

These comments resulted in staff making a further seven substantive changes to the plan prior to seeking Service Council and Board approval for implementation.

8. CONCLUSIONS

The NextGen service restructuring proposals have been evaluated by line or line group, by service type, and by Service Council area. Based on the Service Equity Analysis conducted, Metro found that some lines will experience Disparate Impact and Disproportionate Burden when applying Metro’s policies. However, Metro has evaluated alternatives and the current proposed changes have the least impact to the protected Title VI populations. Therefore, Metro meets the legal test outlined in FTA’s Title VI Circular 4702.1B which states:

“There is a substantial legitimate justification for these changes. Metro can show that there are no alternatives to these proposals that would have a less disparate impact on minority riders, but would still accomplish Metro’s legitimate program goals.”

The following findings were observed:

Finding #1 – Of 112 lines or line groups evaluated there were 17 lines or line groups that would experience a Disparate Impact on minorities on one or more day types. Each of these proposals is consistent with the objectives of the service restructuring program, and alternative services have been identified in each instance that would provide service to most of the impacted riders.

Finding #2 – There are no Disparate Impacts by service type.

Finding #3 – There are no Disparate Impacts by Service Council area.

Finding #4 – Of 112 lines or line groups evaluated there were 31 lines or line groups that would experience a Disproportionate Burden on low income populations on one or more day types. Every line or line group that was

proposed for a significant service reduction, with the exception of Lines 177 and 625 on weekdays, would cause a Disproportionate Burden. This is largely a consequence of the fact that the areas within one quarter mile of all bus stops have a higher share of low income persons than the Metro service area as a whole. Every effort was made in the determination of these proposals to minimize the number of adversely impacted persons, and alternative services would be available in most identified instances.

Finding #5 – Only the Rapid Bus service type would experience a major reduction in services that would result in a Disproportionate Burden on low income populations. In all instances this adverse impact would be mitigated by an increase in service on Local services within each Rapid corridor.

Finding #6 – There are no Disproportionate Burdens by Service Council area.

Contact Us

For additional information, please use the following contact tools to access more project information, ask questions or provide comments.

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