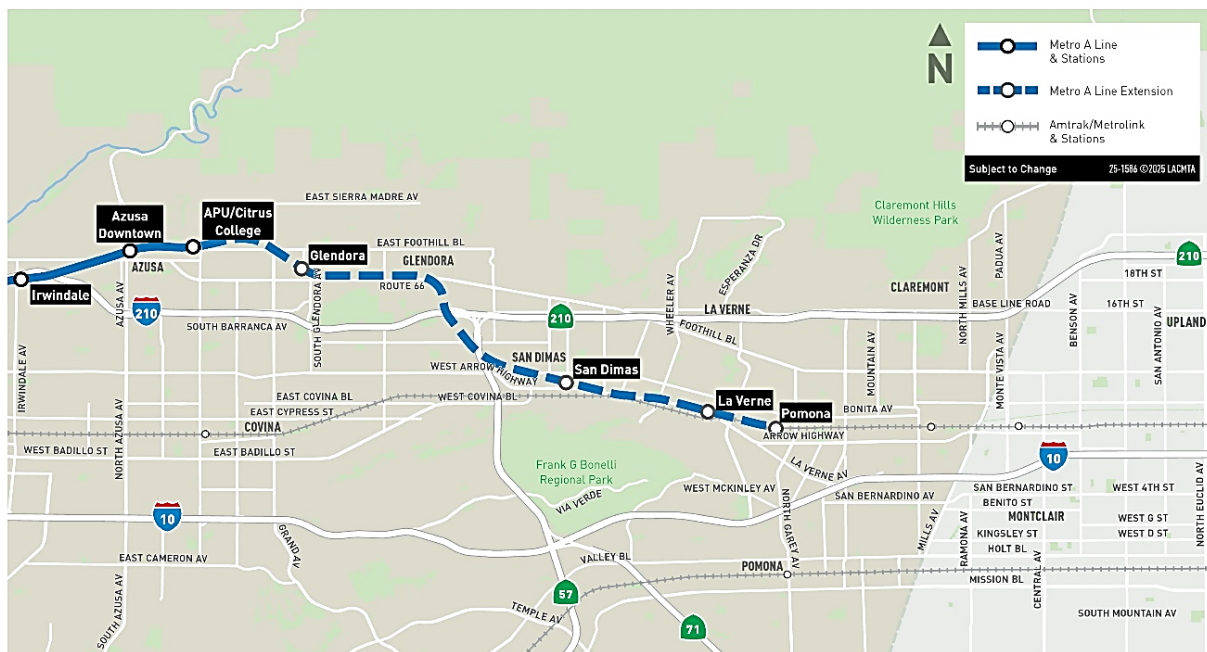


# LA Metro – Foothill 2B Ph. I

## (A Line Glendora to Pomona Extension Rail Project)

### Title VI Service Equity Analysis

#### Metro A Line Extension Foothill Extension 2B Phase I



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## Introduction

Section 601 of Title VI of the Civil Rights Act of 1964 states “No person in the United States shall, on the ground 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.”

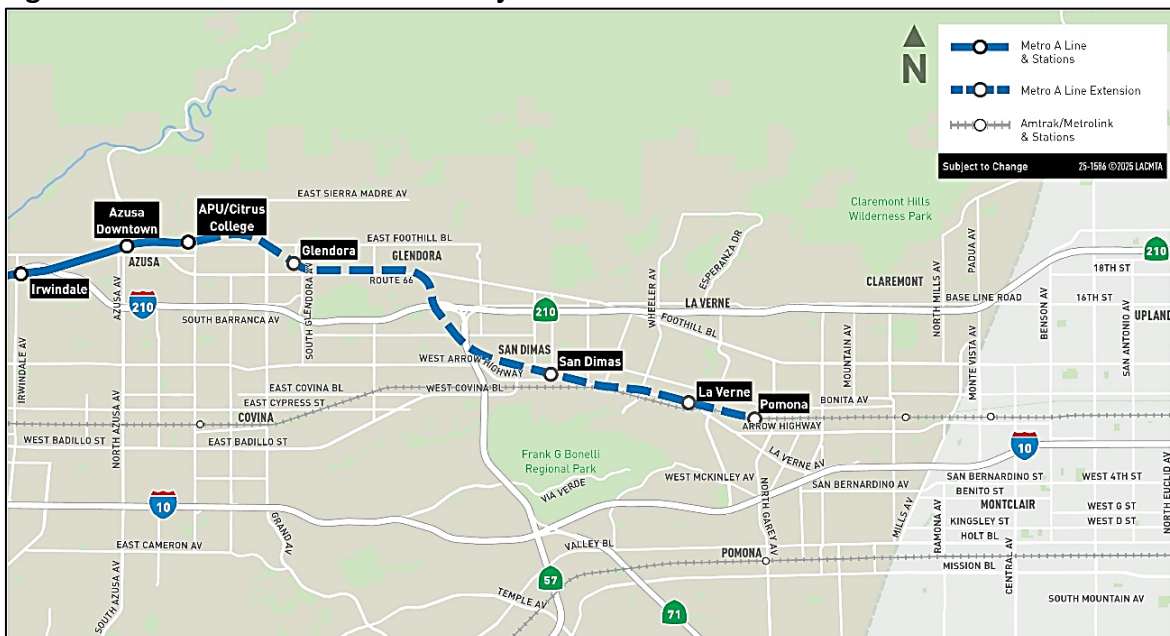
As a recipient of federal funding, LA Metro is required to ensure its programs and activities align with the principles of Title VI. The Foothill 2B Phase I Light Rail Project is an eastern extension of the existing A Line from the APU/Citrus College Station to Pomona and is set to begin revenue service in 2025. In accordance with Federal Transit Administration Title VI guidelines and Metro’s Title VI Plan a Service and Fare Equity (SAFE) Analysis is required to assess the impact of this new service on minority populations.

## Background

The Foothill 2B Phase I Rail Project consists of a 9.2-mile extension of the existing A Line light rail, extending from its current northern terminus at APU/Citrus College Station (Figure 1) to Pomona. This extension introduces four new stations located in Glendora, San Dimas, La Verne, and Pomona. The project was constructed by the Foothill Construction Authority and will be owned and operated by Metro.

Metro will operate up to 8-minute peak service weekday mornings and afternoons (6am-9am and 3pm-6pm), with 10-minute frequency between 9am-3pm weekdays and daytime Saturdays and Sundays. Twenty-minute service will be operated during evening and late night periods. These service levels are consistent with the existing A Line service levels.

**Figure 1 – Foothill 2B Phase I Line Project**



The fare structure for the newly introduced A Line extension will align with the standard pricing applied across Metro's rail and bus network.

The A Line extension extends beyond Metro's primary bus service area and falls predominantly within the Foothill Transit bus service region. Several of their bus lines will directly serve the new A Line stations. To further support seamless integration between bus and rail, Foothill Transit will restructure one existing bus line and introduce a new bus line. Foothill Transit bus lines will serve this extension as detailed here:

- Line 291 serves the Metrolink Pomona North Station (new A Line Pomona Station);
- Line 492 connects to the new San Dimas Station, and;
- Line 284 operates adjacent to the new Glendora Station;
- Line 197 will be rerouted to serve the new La Verne Station;
- Foothill Transit plans to launch a new Line 295, which will provide service to the new San Dimas Station, Cal Poly Pomona, and Mt. San Antonio College.

These changes aim to enhance connectivity, expand transit options, and improve the overall passenger experience for residents throughout the Greater San Gabriel Valley region.

## Analysis

### Metro's Title VI Policies

#### Major Service Change Policy

Metro's Major Service Change Policy requires this Title VI Analysis be completed six months before the opening of the new fixed guideway project (e.g., Foothill 2B Phase I). This requirement applies irrespective of whether the service changes meet the thresholds outlined in other subsections of the policy.

- 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 based on race, color or national origin. This policy defines the threshold Metro will utilize when analyzing the impacts on minority populations and/or riders. For major service changes, a disparate impact will be deemed to have occurred **if the absolute difference between the percentage of minorities adversely affected and the overall percentage of minority riders is at least 5%.**
- Disproportionate Burden refers to a neutral policy or practice that disproportionately affects low-income riders more than non-low-income populations and/or riders. Metro defines low-income as \$69,350 for a four-member household which represents the median income of a four-member household in Los Angeles County. The finding of a disproportionate burden for

major service 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 people adversely affected by the service change and the overall percentage of low-income people is at least 5%.**

The definitions of disparate impact and disproportionate burden were adopted in Metro's Title VI Program which was last updated and approved by Metro's Board in October 2022. The threshold referenced is taken from the California Department of Housing and Community Development's 2024 State income Housing Limits; this amount is being referenced as the updated threshold and will be included in the 2025 Title VI update that will be brought to the Metro Board for adoption later this year.

### **Disparate Impact Analysis Methodology**

To assess whether the change will have a disparate impact on minority riders, the ethnicity demographic data of the community this new rail alignment will serve is analyzed. The data is then compared to the ethnicity demographic data of Metro's entire Service Area. If the absolute difference between the minority percentage along the new rail alignment and the Metro Service Area minority percentage is at least 5%, an impact is deemed to have occurred.

### **Service and Fare Impacts of New A Line Foothill Extension Glendora to Pomona**

When the A Line service is extended to Pomona in mid-2025, approximately 113,000 annual rail revenue hours will be added to the existing transit service to the corridor. No existing light rail segment will see less service as a result of these extra revenue service hours for the A Line extension. As outlined above, the segment between APU/Citrus College and Pomona Stations (serving three intermediate new stations) will have the same levels of service as the rest of the A Line: 8-minute service in the peak periods, and 10-minute service during midday and weekend periods.

The fares for the new A Line extension will be the same as for other Metro rail and bus services and are integrated with the fares for these other services. There are no Metro bus service changes being made because of the new rail services to be operated as described above.

### **Minority and Low-Income Populations Served by New A Line Foothill Extension Glendora to Pomona**

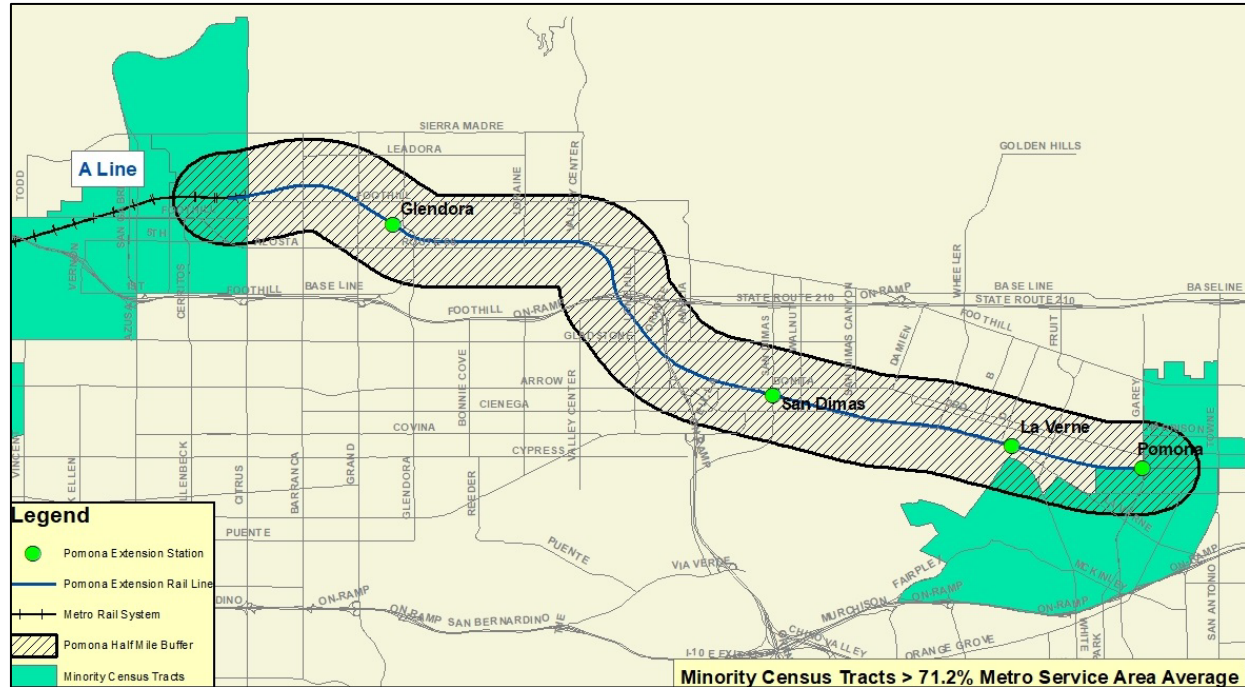
As required under Title VI, Metro has reviewed the minority and low-income populations that will be served by the new 9.2-mile, 4-station Foothill 2B Ph I (A Line Extension Glendora to Pomona) rail service based on being within 0.5 miles of the alignment. The relevant data is shown in Tables 1 and 2 below. There is no ridership data to analyze for demographics as the line is not yet in operation.

The minority population that will be served by the Foothill 2B Ph I rail project (see Figure 2, 0.5-mile catchment) comprises 64.3% of the overall population; the new line will serve a minority population 6.9% lower than the 71.2% average for Metro's overall service area. This constitutes a disparate impact to the minority population under Title VI. However, since the project is a benefit to both the corridor and the minority population the new line will serve, by adding a new rail service and not

**LA Metro – Foothill 2B Ph. I (A Line Glendora to Pomona Extension Rail Project)**  
**Title VI Service Equity Analysis**

reducing associated Metro bus services, the disparate impact is positive for the minority population under Title VI and does not require any review of alternative options for mitigation.

**Figure 2 – Foothill 2B Ph I (A Line Ext. to Pomona) – Minority Population**



**Table 1**

Comparison	Population	Minority Population	Minority Percentage
<b>Foothill 2B Ph I Rail Project</b>	127,145	81,733	64.3%
<b>Metro Service Area</b>	7,580,839	5,397,073	71.2%
<b>Difference Comparison</b>			-6.9%

*Note: Data source is the 2023 American Community Survey.*

The low-income households that will be served by the Foothill 2B Ph I rail project (see Figure 3, 0.5-mile catchment) comprise 38.7% of the households. This is 6.5% lower than the Metro Service Area average of 45.2% for low-income households. Consequently, this would normally represent a disproportionate burden for the low-income households the new line will serve. However, since the project is a benefit to both the corridor and the low-income households the line will serve, by adding a new rail service and not reducing associated Metro bus services, the disproportionate burden is positive for the low-income population under Title VI and does not require any review of alternative options for mitigation.



Figure 3 – Foothill 2B Ph I (A Line Ext. to Pomona) – Low-Income Population

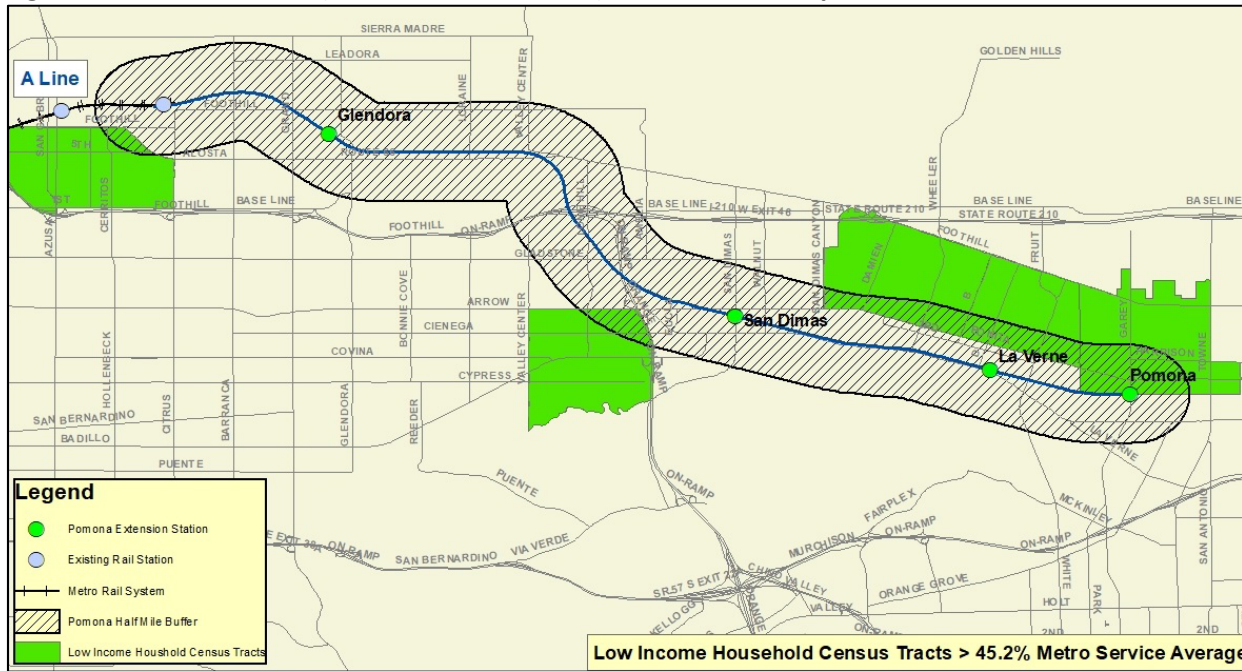


Table 2

	Number of Households	Number of Low-Income Households	Low-Income Household Percentage
<b>Foothill 2B Ph I Rail Project</b>	42,119	16,313	38.7%
<b>Metro Service Area</b>	2,663,368	1,205,146	45.2%
<b>Difference Comparison</b>			-6.5%

Note: Data source is the 2023 American Community Survey.

## Outreach

Throughout the development and construction of the Foothill Extension light rail project, the Foothill Construction Authority conducted an extensive outreach and communications program engaging a wide range of audiences in the corridor area with information and updates about the project. This included key stakeholder group briefings and presentations, distribution of construction notices, e-notifications, and press releases as summarized below. Special accommodations, including Spanish language interpretations were made available upon request for all meetings. A fact sheet containing the project’s hotline number, website, and email address was widely distributed and posted on the project website. In 2011, Public Scoping Meetings on the Proposed Azusa to Montclair Light Rail Extension were held to receive feedback on the project scope, alternatives to be reviewed in the environmental report, and issues needing to be addressed through the draft environmental impact report analysis. Each public scoping meeting drew 60-70 participants. The public comment period was held from December 27, 2010, through February 2, 2011. Meetings were held as follows:

- Wednesday, January 12, 6-8 pm: Ganesha Community Center, Ganesha Park, 1575 N. White Av, Pomona, CA

- Wednesday, January 19, 6-8 pm: Oakmont Elementary School, 120 W. Green St, Claremont, CA
- Thursday, January 13, 6-8 pm: Timothy Daniel Crowther Teen and Family Center, 241 W. Dawson Av, Glendora, CA
- Thursday, January 20, 6-8 pm: Ekstrand Elementary School, 400 N. Walnut Av, San Dimas, CA

These meetings were publicized through the following methods:

- Direct mail postcards to approximately 15,000 property owners, occupants and stakeholder database (business and community-based organizations, environmental justice groups, etc.)
- Legal notices in the San Gabriel Tribune and the Inland Valley Daily Bulletin
- Display advertising in local newspapers
  - Inland Empire Weekly
  - Inland Valley Daily Bulletin
  - Claremont Courier
  - San Gabriel Valley Tribune
- Digital Media:
  - Project E-News Update, blog, and social media channels (Facebook, Twitter)
  - Email eblast through local chambers of commerce
  - City websites, website calendars and/or newsletters, and social media
- Media Sources /Earned Media
- Outreach calls/e-mails to approx. 75 community/civic organizations and chambers

In 2012, Public Hearings on the Draft Environmental Impact Report for the Azusa to Montclair Project were held to review the Draft EIR and receive feedback. A 45-day public comment and review period was held from August 21, 2012 until October 5, 2012. Hearings were held on the following dates:

- September 20, at 5:30 PM: Montclair Senior Center, 5111 Benito St, Montclair, CA 91763
- September 24, 5:30 PM: Hillcrest Meeting House, 2705 Mountain View Dr, La Verne, CA 91750

These meetings were publicized through the following methods

- Direct mail to 13,946 business and community-based organizations, environmental justice groups, homeowner/resident/neighborhood associations, previous meeting participants, and those who requested information about the project, and residents near the alignment.
- Digital Media:
  - Project E-News Update
  - Email eblast through local chambers of commerce
  - City websites and/or newsletters, city website calendars, social media
- Project social media channels (Facebook, Twitter)
- Media Sources /Earned Media
  - Antonovich.com, Claremont Courier Claremont-La Verne Patch, Courier City Beat, Curbed LA, Inland Valley Daily Bulletin, Monrovia Patch, Pasadena Star-News, Railway Track and Structure, San Gabriel Valley Tribune and Whittier Daily News

In 2015, Community Open House Meetings were held in each city, to update the community on the project status and schedule from Azusa to Montclair, highlight station art/artists, and receive initial art concepts feedback.

- La Verne - April 16, 6-8 PM: La Verne Community Center, 3680 “D” St, La Verne, CA 91750-
- Montclair - April 21, 6-8 PM: Montclair Senior Center, 5111 Benito St, Montclair, CA 91763-
- Glendora - April 23, 6-8 PM: Glendora Public Library, 140 S. Glendora Av, Glendora, CA 91741
- Claremont - April 29, 6-8 PM: Alexander Hughes Community Center - Padua Room, 1700 Danbury Rd, Claremont, CA 91711
- San Dimas - April 30, 6-8 PM: San Dimas Senior Center, 201 E. Bonita Av, San Dimas, CA 91773-
- Pomona - May 7, 6-8 PM: Palomares Park Community Center, 499 E. Arrow Hwy, Pomona, CA 91767

These meetings were publicized through the following methods

- E-communications toolkit distributed to key organizations to supplement notification
- Display advertising in local newspapers and social media
  - Inland Valley Daily Bulletin
  - Claremont Courier
  - San Gabriel Valley Tribune
  - Los Angeles Times
  - Facebook Ad
- Digital Media:
  - Project E-News Update, website, blog, and social media channels (Facebook, Twitter)
  - Email eblast through local chambers of commerce
  - City websites, website calendars and/or newsletters, social media
- Media Advisories
- Direct mail postcards to approximately thousands of property owners within ½- mile of the rail corridor, plus email invitations to the project stakeholder database.

In 2017, Community Open House Meetings were held in each city to update the community on the project status and schedule from Azusa to Montclair, highlight station art/artists and what to expect during construction.

- Thursday, July 13, San Dimas Senior/Community Center, 201 E. Bonita Av, San Dimas, CA 91773
- Tuesday, July 18, Palomares Park Community Center, 499 E. Arrow Hwy, Pomona, CA 91767
- Wednesday, July 19, Montclair Senior Center, 5111 Benito St, Montclair, CA 91763
- Monday, July 24, Alexander Hughes Community Center, 1700 Danbury Rd Claremont, CA 91711
- Thursday, August 3, Hillcrest Retirement Community, 2705 Mountain View Dr, La Verne, CA 91750
- Monday, August 7, Glendora Library, Bidwell Forum, 140 S. Glendora Av, Glendora, CA 91741

These meetings were publicized through the following methods

- E-communications toolkit distributed to key organizations to supplement notification
- Display advertising in local newspapers and social media
  - Inland Valley Daily Bulletin
  - Claremont Courier
  - San Gabriel Valley Tribune
  - San Gabriel Examiner
  - Los Angeles Times
  - Facebook Ad



- Digital Media:
  - Project E-News Update, website, blog, and social media channels (Facebook, Twitter)
  - Email eblast through local chambers of commerce
  - City websites, website calendars and/or newsletters, social media
- Media Advisories
- Direct mail postcards to approximately thousands of property owners within ½- mile of the rail corridor, plus email invitations to the project stakeholder database.

On Monday, December 10, 2018 (5:30-7:30 PM) at La Verne Community Center, 3680 D St, La Verne CA 91750, a Scoping Meeting for the Supplemental Environmental Impact Report (SEIR) was held to discuss possible construction and operation phasing for the 12.3-mile, six-station Glendora to Montclair Project, and a proposed modification to the future parking facility location at Pomona Station. The public comment period was held from December 10, 2018 - January 4, 2019 (approximate start date). The meeting was publicized through the following methods:

- Printed and mailed libraries for public counter distribution
- E-communications toolkit distributed to key organizations to supplement notification
- Legal notices in the San Gabriel Tribune and the Inland Valley Daily Bulletin
- Display advertising in local newspapers and social media
  - Inland Valley Daily Bulletin
  - Claremont Courier
  - San Gabriel Valley Tribune
  - San Gabriel Valley Examiner
  - Los Angeles Times
  - Facebook Ad
- Digital Media:
  - Project E-News Update, website, blog, and social media channels (Facebook, Twitter)
  - Email eblast through local chambers of commerce
  - City websites, website calendars and/or newsletters, social media
- Media Advisories

A Public Hearing to review and comment on the Draft Supplemental Environmental Impact Report (SEIR) was held on Tuesday, April 16, 2019 (5:30 – 8:30 PM). The Hearing started at 6 PM at La Verne Community Center, 3680 D St, La Verne, CA 91750. The public comment period was held from March 22, 2019 - May 6, 2019. The hearing was publicized through the following methods:

- Printed and mailed or emailed notices to libraries chambers of commerce and cities for public counter distribution
- E-communications toolkit distributed to key organizations to supplement notification
- Legal notices in the San Gabriel Tribune and the Inland Valley Daily Bulletin
- Display advertising in local newspapers and social media
  - Inland Valley Daily Bulletin
  - Claremont Courier
  - San Gabriel Valley Tribune
  - San Gabriel Valley Examiner
  - Los Angeles Times
  - La Nueva Voz
  - Mid Valley News
  - Facebook Ad

- Digital Media:
  - Project E-News Update, website, blog, and social media channels (Facebook, Twitter)
  - Email eblast through local chambers of commerce
  - City websites, website calendars and/or newsletters, social media
- Media Advisories

In 2020, Community Open Houses were convened to update the community on the project status and schedule as it was readied for construction. The design-build team, Draft Baseline Schedule, staff and station artists were available to discuss the project and answer questions. While there was information on the Pomona to Montclair segment of the project, the open houses focused on the beginning of construction for the Glendora to Pomona segment. Open house meetings were held as follows:

- Glendora - Thursday, March 5: Glendora Public Library, Bidwell Forum, 140 S. Glendora Av, Glendora, CA 91741. Station Artist: Michael Hillman
- La Verne - Tuesday, March 10: La Verne Community Center, 3680 "D" St, La Verne, CA 91750. Station Artist: Blue McRight
- Pomona - Wednesday, March 11: Palomares Community Center, 499 E Arrow Hwy, Pomona, CA 91767. Station Artist: Steve Farley
- San Dimas - Thursday, March 12: Stanley Plummer Community Building 245 East Bonita Av, San Dimas, CA 91773. *Station Artist: Eugene & Anne Daub (meeting cancelled due to COVID and start of Stay-at-Home orders)*

These meetings were publicized through the following methods:

- Printed and mailed or emailed notices to libraries chambers of commerce and cities for public counter distribution
- E-communications toolkit distributed to key organizations to supplement notification
- Display advertising in local newspapers and social media
  - Inland Valley Daily Bulletin
  - San Gabriel Valley Tribune
  - San Gabriel Valley Examiner
  - College Newspapers: University of La Verne, Citrus College, Cal Poly Pomona
  - Los Angeles Times
  - La Nueva Voz
  - Facebook Ad
- Digital Media:
  - Project E-News Update, website, blog, social media channels (Facebook, Twitter)
  - Email eblast through local chambers of commerce
  - City websites and/or newsletters, city website calendars, social media,
- Media Advisories

A Virtual Public Scoping Meeting for the Supplemental Environmental Impact Report (SEIR) 2 was held on Wednesday, June 24, 2020, 5:30 PM-7 PM due to COVID Stay-at-Home orders. The meeting was held to update the community on the Glendora to Montclair project and receive input on impacts of concerns for the Project Modifications including potential changes to proposed parking at station locations in Glendora, San Dimas, La Verne, Pomona and

Claremont. Public comments were accepted through July 8, 2020. The meeting was publicized through the following methods:

- Agency coordination with cities and school districts
- E-communications toolkit distributed to key organizations to supplement notification
- Legal notices in the San Gabriel Tribune and the Inland Valley Daily Bulletin
- Digital Media:
  - Project E-News Update, website, blog, and social media channels (Facebook, Twitter)
  - City websites and/or newsletters, city website calendars, social media,
- Local and regional media outlets received Project E-News Update

As the project moved from planning to construction, the Construction Authority implemented proactive communication strategies with stakeholders including residents, small and large businesses, cities, higher education institutions, emergency responders, community service organizations, senior housing organizations, media outlets and others. The primary goal was to utilize a “no surprises” approach that proactively informed stakeholders about upcoming construction and potential impacts. Since the beginning of construction in 2020, the Authority kept the community apprised of over 200 street closures and directly distributed more than 47,500 construction notices. Construction notices in English and Spanish were made available to Pomona stakeholders at the City’s request (no other city requested additional languages). A comprehensive list of notification tactics to support the “no surprises” approach is included below. Additionally, over 430 inquiries were received and responded to by the project team through the project hotline and email.

In addition to direct outreach to the most impacted residents and businesses, the Construction Authority kept the general public updated on the project and how to ask questions through the following:

- Weekly pictures of the week, monthly e-news updates, quarterly newsletters
- On-line interactive construction map with widget for stakeholder websites
- Robust public information materials (newsletters, factsheets, 3D station models, website, blog, monthly and topic-specific videos)
- Construction signage
- Community presentations, briefings and meetings
- Neighborhood walks and activity center outreach
- Traditional media and social media
- Advertisements in local newspapers
- Partnerships with cities, chambers of commerce and Unified School Districts to maximize reach

A Virtual Community Update Meeting was held on Wednesday, May 19, 2021: 6 PM-7 PM to update the community on progress and the latest construction update, including project schedule, stations and art component, parking, upcoming bridge construction, and more. The meeting was publicized as follows:

- Door-to-door notice distribution
- E-communications toolkit distributed to key organizations to supplement notification
- Legal notices in the San Gabriel Tribune and the Inland Valley Daily Bulletin
- Display advertising in local newspapers and social media:
  - Inland Valley Daily Bulletin
  - San Gabriel Valley Tribune
  - San Gabriel Valley Examiner
  - Los Angeles Times
  - La Nueva Voz
  - Claremont Courier
  - Facebook Ad
  - College Newspapers:  
University of La Verne, Cal  
Poly Pomona
- Digital Media:
  - Project E-News, website, blog, and social media channels (Facebook, Twitter)
  - Email eblast through local chambers of commerce
  - City websites and/or newsletters, city website calendars, social media,
- Media Advisories

A Virtual Public Scoping Meeting for Draft Supplemental Environmental Impact Report 3 was held on Tuesday, October 26, 2021 starting at 5:30 PM to discuss potential project modifications in the City of San Dimas and receive feedback regarding the scope and content of the SEIR 3. The public comment period was held from October 14, 2021-November 19, 2021.

The meeting was publicized as follows:

- Outreach included direct email to the most interested stakeholders
- E-communications toolkit distributed to key organizations to supplement notification
- Legal notices in the San Gabriel Tribune and the Inland Valley Daily Bulletin
- Digital Media:
  - Project E-News Update, website, blog, and social media channels (Facebook, Twitter)
  - City websites and/or newsletters, city website calendars, social media

A Virtual Public Scoping Hearing was held on Tuesday, October 26, 2021, starting at 5:30 PM to announce the release of Draft Supplemental Environmental Impact Report (SEIR) 3 for proposed Project Modifications to the Glendora to Montclair Project in the City of San Dimas. The document was made available online and via hard copy or CD versions upon request. In light of the COVID-19 pandemic, viewing of the document in person was only available by appointment. A 45-day public comment period was held from February 18, 2022 - April 4, 2022.

The meeting was publicized as follows:

- Outreach included direct emails
- Legal notices in the San Gabriel Tribune and the Inland Valley Daily Bulletin advertising the Notice of Availability and comment period
- Draft SEIR3 and NOA were placed on the Authority's website
- Project E-News Update, blog, and social media channels (Facebook, Twitter)
- Media advisories

### Additional Events and Presentations

Authority staff also participated in a variety of events and presentations to inform stakeholders about the project and encourage participation in public meetings; a sampling is provided below:

Event/Presentation Name	Date
Chambers of Commerce and BIDs (Glendora, San Dimas, La Verne, Pomona, Claremont and Montclair)	Multiple presentations to each over the years
Glendora Earth Day Festival	Annual participation
Claremont Earth Day	Annual participation
San Dimas Earth Day	Annual participation
San Dimas Birthday Celebration	Annual participation
Rotary and Kiwanis Presentations (Glendora, Pomona, Claremont)	Multiple project updates to each group
University Club of Claremont	Multiple project updates
La Verne and Claremont Transportation Commissions	Multiple project updates
San Dimas Business Round Table	October 21 and 22, 2020
State of the City – Glendora, San Dimas, La Verne, Pomona, Claremont and Montclair	Annual participation or as available
Hillcrest Continuing Care Retirement Community	Annual participation
San Gabriel Valley Older Adult Transportation	Multiple presentations over the years
Citrus College President and Board Briefing	Multiple presentations over the years

Metro’s San Gabriel Valley Service Council also received information regarding the various meetings and briefings that were held throughout the project planning and construction, which were shared through their meetings. The Service Council also received periodic briefings on the project on July 10, 2017, August 10, 2020, and Monday, March 11, 2024. Service Council meetings are subject to the Brown Act and were publicized through Metro’s website, e-notifications, and posts on Metro’s blog, The Source. Their meetings are open to the public.

The Foothill Extension service plan was formally adopted by Metro Board at their December 2018 meeting. As project construction was completed and the project turned over to Metro to begin pre-revenue service testing for the opening of the first segment from Glendora to Pomona, Metro will focus outreach on informing the community of the start date for this new service.

## Conclusion

The A Line Extension Foothill 2B Phase I project extends light rail service from Glendora to Pomona, enhancing transit accessibility for minority populations and low-income households along the new rail corridor. This extension has been evaluated under Title VI and determined

not to impose disparate impacts or disproportionate burdens, thus eliminating the need for mitigation. The A Line rail extension will deliver high-quality mobility options to the community aligning with the overarching objective of improving public transit services by expanding rail coverage throughout the Los Angeles region. Minority and low-income riders will significantly benefit from this light rail extension.

Metro followed the requirements of FTA Circular 4702.1B and met the legal test for disparate impact as follows:

*(1) Metro has a substantial legitimate justification for the proposed service change as it works to expand access to high-quality rail service and facilities across the Metro service area; (2) Metro has no alternatives that would have a less disparate impact on minority riders but would still accomplish the transit provider's legitimate program goals with the opening of Foothill 2B Ph 1. Staff therefore requests that the Metro Board adopt this analysis in support of the impending extension of the A Line service to Pomona.*