



## Board Report

File #: 2016-0153, File Type: Policy

Agenda Number: 28

### SYSTEM SAFETY, SECURITY AND OPERATIONS COMMITTEE APRIL 14, 2016

**SUBJECT: TITLE VI & ENVIRONMENTAL JUSTICE EQUITY EVALUATIONS OF MAJOR SERVICE AND FARE CHANGES FOR JUNE 2016 SERVICE CHANGE PROGRAM**

**ACTION: ADOPT FINDINGS OF EVALUATIONS**

#### RECOMMENDATION

ADOPT:

- A. the finding of no Disparate Impact and no Disproportionate Burden resulting from **proposed major service discontinuations and major new service proposals for June 2016 implementation (Attachment A)**;
- B. the finding that improving service on Line 704 to conform to the new loading standards creates a Disparate Impact but no Disproportionate Burden. The Disparate Impact is created because Line 704 serves an area significantly less minority than the county average and there is no alternative that is less discriminatory (**Attachment A**); and
- C. the finding of no Disparate Impact and no Disproportionate Burden for proposed exemption of Line 577 from express fare charge (**Attachment B**).

#### ISSUE

Metro's Administrative Code Section 2-50 requires an equity evaluation in accordance with Federal Transit Administration Circular 4702.1B for defined major service changes and any fare changes. These evaluations determine whether there are significant differences in the minority shares of impacted riders and systemwide riders that may indicate an adverse effect upon minority riders (Disparate Impact), and whether there are significant differences in the poverty shares of impacted riders and systemwide riders that may indicate an adverse effect upon poverty level riders (Disproportionate Burden). The thresholds of significance are Board adopted and stated in Metro's Administrative Code Section 2-50.

For major service changes a Disparate Impact may result from an absolute difference in the minority shares greater than 5% and/or a relative difference in the minority shares exceeding 20%. A Disproportionate Burden may result from an absolute difference in the poverty shares greater than 5% and/or a relative difference in the poverty shares exceeding 20%. For fare changes the

respective levels of significance are 5% and 35%.

## **DISCUSSION**

There are 14 major service changes among those proposed for June 2016 implementation, and one action that would result in fare changes to riders. The service changes are evaluated in Attachment A. The fare changes are evaluated in Attachment B (Line 577). The assumption of service by Foothill Transit on Lines 190/194 and 270 had no findings of a Disparate Impact or Disproportionate Burden. This is because Foothill Transit has committed to retain the Metro fare structure on these lines for one year (Attachment C).

The major service changes included eight proposals to discontinue all or part of a route, six proposals to implement new or extended services, and one proposal to increase midday headways. None of these proposals was found to cause a Disproportionate Burden on poverty level populations served. However, the proposal to increase midday headways on Line 704 was found to cause a Disparate Impact on minority populations served. In the instance of a Disparate Impact, the action can proceed provided that a significant agency objective is achieved by the action, and no alternative action that would achieve the objective would result in a lesser impact. The proposed action would conform midday service on Line 704 to recently adopted Loading Standards designed to limit crowding. No alternative to adding service would accomplish this objective.

It was proposed to exempt Line 577 riders from payment of an express charge normally applicable to services with significant segments of freeway travel. No Disparate Impact or Disproportionate Burden would result from this action. Because of Board adoption of Motion 63 in February 2016, staff recommended that the affected Service Councils not approve the proposed action to reduce the fare so that service restructuring in the corridor could be studied.

## **DETERMINATION OF SAFETY IMPACT**

The requested actions in this report will have no direct impact on the safety of Metro's employees or customers.

## **FINANCIAL IMPACT**

The impact of these findings and all related service modifications will be reflected in the FY17 proposed budget.

### **Impact to Budget**

All related service modifications will be funded with Federal, State, and Local funds that are eligible for Bus Operations.

## **ALTERNATIVES CONSIDERED**

There is no alternative to conducting service and fare equity evaluations for proposed major service changes or any proposed fare changes. These actions are required both by Federal Transit

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Administration Circular 4702.1B and Section 2-50 of Metro's Administrative Code.

**NEXT STEPS**

The adoption of the recommended findings will permit implementation of the service changes adopted by Metro's Service Councils in June 2016.

**ATTACHMENTS**

Attachment A - Service Equity Analysis Methodology & Results

Attachment B - Line 577 Exemption from Express Charge

Attachment C - Foothill Transit Letter of Commentment

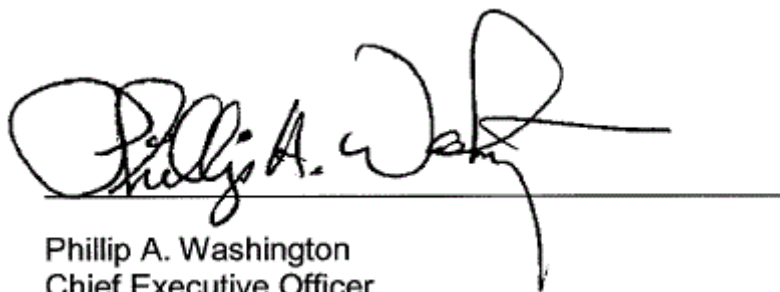
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