

LA Metro – Crenshaw Rail Project Title VI Service Equity Analysis



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Introduction

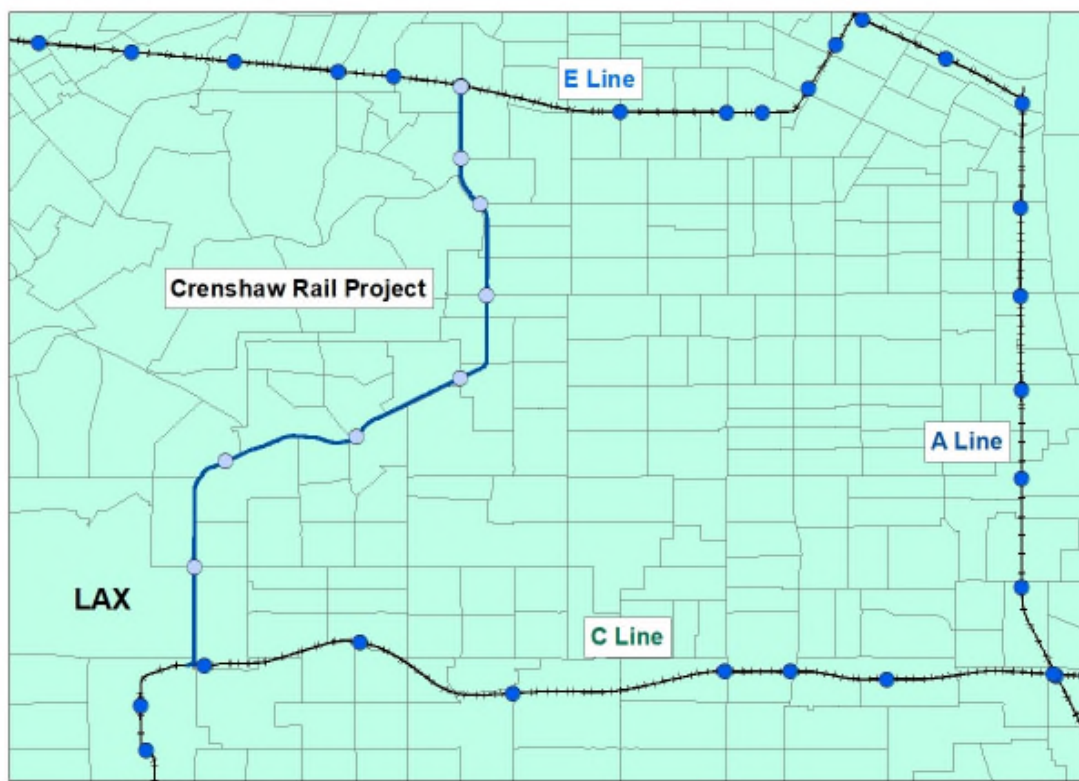
Section 601 of Title VI of the Civil Rights Act of 1964 states “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

LA Metro, as a recipient of federal funding, is required to ensure its programs and activities are conducted consistent with the intent of Title VI. The Crenshaw light rail project is a new rail alignment involving federal funding that is expected to begin operation in 2022. Consistent with Federal Transit Administration Title VI guidelines and Metro’s Title VI Plan, a Service and Fare Equity (SAFE) Analysis of the impacts of this new service on minority populations is required.

Background

The Crenshaw Rail Project is an 8.5-mile extension of C Line (Green) light rail from Aviation/Imperial to the Exposition Line at Exposition/Crenshaw (Figure 1), including nine new stations. Included is a station at the Airport Metro Connector that will provide a direct connector to the new LAX airport people mover system. The Crenshaw line will be known as the K Line and will be integrated with C Line (Green) operations consistent with the Metro Board adopted Operating Plan. This new line links with three existing rail lines (A-Line, C-Line, E-Line).

Figure 1 – Crenshaw Rail Line Project



Due to the construction of the Airport Metro Connector station, the Crenshaw rail service will be opened in three stages:

- 1) 2022: New K Line rail service would begin on the segment between Westchester Veteran and Expo Crenshaw stations, serving five intermediate stations, with a bus bridge service between Westchester/Veterans station and Aviation/LAX station on the C Line (Green).

K Line service would operate up to every 6-minute in peak periods weekdays, 12-minute off peak service weekdays and weekends, and 20-minute evening service, consistent with the E Line (Expo) service that it will connect with, as well as that operated across most of the Metro light rail network.

The C Line Green service would continue to operate existing service levels between Norwalk and Redondo Beach stations.

- 2) Late 2023: Full K Line service, integrated with the C Line (Green) service between Norwalk C Line (Green) station and Expo Crenshaw K Line station. Aviation Century station would be served and bus bridge service would no longer be required. At this time, C Line (Green) service would be modified to operate between Willowbrook Rosa Parks C Line (Green) station to Redondo Beach C Line (Green) Station.

K Line service in this phase overlaps the C Line (Green) service between Willowbrook Rosa Parks and Aviation LAX station, combined to provide at least doubling service frequencies in this segment:

- Up to 3-minute combined peak weekday service (currently up to 6 minute)
- 6-minute weekday and weekend off peak service (currently 15-minute)
- 10-minute evening service (currently 20-minute) frequencies available in this segment.

- 3) Late 2024: Same service patterns as for Phase 2 above with the addition of the Airport Metro Connector station.

The fares for the new K Line light rail service will be the same as for other Metro rail and bus services.

There are no other bus service changes being made as a result of the new rail services above.

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 prior to the opening of the new fixed guideway project (e.g. Crenshaw light rail corridor). It is required regardless of whether or not the amount of service being changed meets the requirements in the other subsections of the policy.

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 riders. For fare changes, a disparate impact will be deemed to have occurred **if the absolute difference between the percentage of minority riders adversely affected and the overall percentage of minority riders is at least five percent** 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 riders more than non-low-income riders. Metro defines low-income riders at **\$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 fare 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 which was updated and approved by Metro's Board in October 2019.

Disparate Impact Analysis Methodology

In order to assess whether the change will have a disparate impact on minority riders, this report evaluates the ethnicity demographic data of the community this new rail alignment will serve. 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 alternatives and the Metro Service Area percentage is at least five percent, an impact is deemed to have occurred.

Service and Fare Impacts

When the Crenshaw (K Line) light rail service comes online beginning in 2022, it will add approximately 72,000 annual rail revenue hours to existing transit service to corridor. No existing light rail segment will see less service. As outlined above, the segment between Willowbrook Rosa Parks and Aviation LAX stations (serving five intermediate stations) will see double the existing peak service weekdays (up to 3 min. compared to 6 minute) and evening service (from 20-minute to 10-minute) and more than doubling off peak weekday and weekend service (from 15-minute to 6-minute), through the combined C and K Line service levels. The only impact is those passengers boarding at C Line (Green) stations east of Willowbrook Rosa Parks Station travelling to stations west of Aviation/LAX station will need to change trains there.

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

Minority and Low-Income Populations Served by New K Line

As required under Title VI, Metro has reviewed the minority and low-income populations that will be served by the new 8.5-mile, 9 station Crenshaw (K Line) rail service based on being within 0.5 miles of the alignment. The relevant data is shown in Table 1 below. There is no ridership data to analyze for demographics as the line is not yet in operation.

Table 1

	Population	Minority Population	Minority Percent	Households	Low Income Households	Low Income Household Percent
Crenshaw Rail Project	177,720	159,028	89.5%	68,026	30,375	44.7%
Metro Service Area	9,417,605	6,634,742	70.5%	3,176,713	1,089,941	34.3%
Difference Comparison			19.0%			10.3%

Note: The Metro Service Area information is from the October 2019 Title VI Update Report to the Metro Board.

The minority population that will be served by the K Line (see Figure 2, 0.5-mile catchment) comprise 89.5 percent of the overall population the new line will serve is 19 percent higher than the 70.5 percent average for Metro’s overall service area. This constitutes a disparate impact to 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 reducing associated 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.

The Low-income households that will be served by the K Line (see Figure 3, 0.5-mile catchment) comprise 44.7 percent of the households. This is 10.3 percent higher than the Metro Service Area average of 34.3% 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 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.

Outreach

Throughout the development and construction of the Crenshaw rail project, Metro has provided a comprehensive bilingual (English/Spanish) outreach and communications program. This includes door-to-door outreach, community construction update meetings, key stakeholder group briefings and presentations, distribution of construction notices, e-notifications, and press releases. A fact sheet inclusive of the project’s hotline number, website and email address has also been widely distributed and posted on the project website. The Metro Construction Relations team continues to implement this robust outreach and communications program to notify the neighboring communities, stakeholders and the public of construction progress and changes to the project’s schedule despite the COVID-19 pandemic.

In early 2019, the public outreach plan was further enhanced by:

- Briefings between Metro CEO and key community leaders that included updates on construction milestones, challenges and contractor’s changes to the anticipated project completion date. Key community leaders include Community Leadership Council members, local business owners as well as faith-based leadership.

- Providing updates to key community leaders via a letter from Metro CEO;
- Weekly e-notifications to the over six thousand project stakeholder list;
- Phone calls to stakeholders;
- Bi-monthly virtual online community construction progress meetings with phone option to participate;
- Ongoing monthly briefings to council staff, neighborhood councils, chambers, and area community-based organizations.

Throughout the rollout of these enhanced communications, Metro has been transparent in its communications with the public about delays in completing the project. The agency has made it clear that safety is its number one priority. Metro will not accept the project until all testing has been satisfactorily completed to assure a safe and reliable system for the public. The community have appreciated Metro’s transparency and continued communications.

Outreach to local small businesses has also been a key step in project outreach given the construction impacts in the corridor. Metro has outreached through one-on-one phone calls and emails to inform the small businesses of the benefits offered by the Eat Shop Play mitigation program offered to Metro. Over 80 small businesses have registered as participants of this program. As participants, they have been provided free advertisement in English and Spanish either on local print/virtual ads, Metro station digital kiosks, bus cards, banners or spotlighted on e-newsletters and/or through various social media platforms. During COVID-19 restrictions, the Eat Shop Play program utilized weekly emails to the entire Eat Shop Play distribution (over 18,000 addresses). This email campaign focused on businesses that had online offerings, or restaurants that offer takeout or delivery options.

The Crenshaw service plan was formally adopted by Metro Board at their December 2018 meeting. This was preceded by public workshops and Metro Service Council meetings held in the community in September 2018 as follows:

Community

- Tuesday, September 25 - Crenshaw Community Leadership Council (CLC)
- Monday, September 17 - Public Meeting (Gateway Cities Council of Governments)
- Thursday, September 20 - Public Meeting (The Proud Bird - 11022 Aviation Blvd)
- Wednesday, September 26 – Public Meeting (Baldwin Hills Crenshaw Mall)

Service Councils

- Wednesday, September 12 - Westside Central Service
- Thursday September 13 – Gateway Cities Service Council
- Friday, September 14 - South Bay Service Council

Both South Bay Cities and Gateway Cities Councils of Government received briefings at this time in 2018.

As a completion date becomes clearer for construction, and Metro begins pre-revenue service testing for the opening of the first segment between Westchester/Veterans and Expo/Crenshaw, outreach will focus on informing the community of this new service as well as the expected timeline for the full

project completion to connect to the C Line Green alignment once the platform facing at AMC Station is completed and run through train service there can be safely operated.

Conclusion

The Crenshaw Rail project will create the new K Line rail service, providing a benefit to minority population and low-income households that will be served by this new rail corridor. As a result, the disparate impacts and disproportionate burdens under Title VI are of a positive nature and do not require mitigation. The project will provide new high quality mobility options for the community it will service which is consistent with the overall goal of improving public transit service through expanding rail service coverage across the LA region. Minority and low-income riders will be beneficiaries of the project.

Metro followed 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; and (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 Crenshaw rail. Staff is therefore requesting the Metro Board adopt this analysis in support of the impending introduction of K Line rail service.

Figure 2 – Crenshaw Rail Line – Minority Population

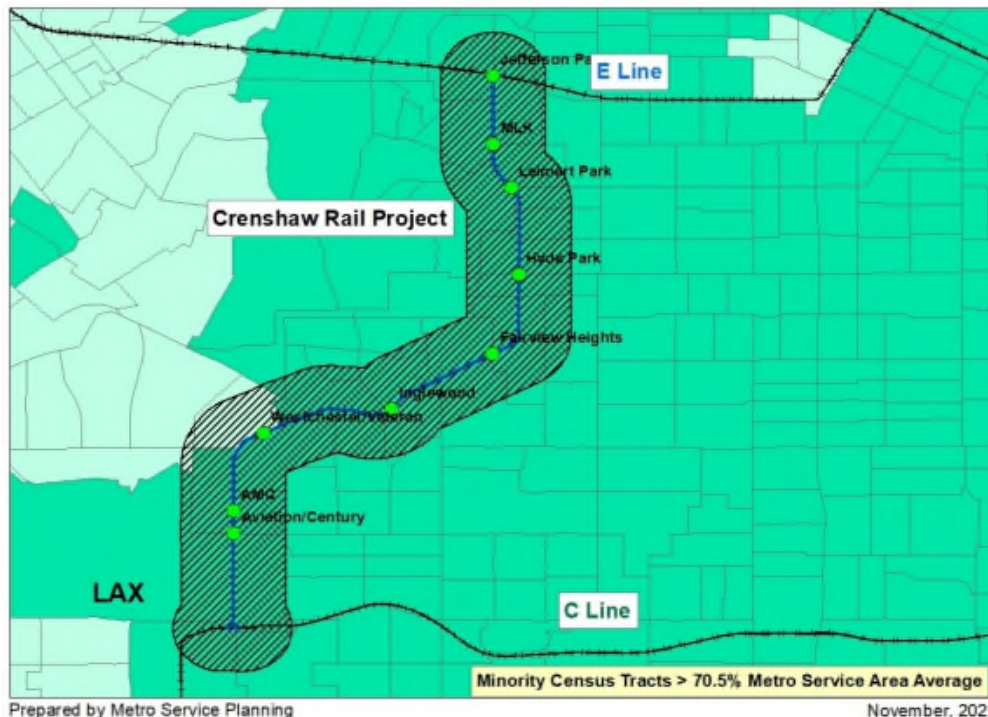


Figure 3 – Crenshaw Rail Line – Low Income Population

