Title VI Public Hearing Crenshaw LAX Light Rail Project Service Plan Regional Connector Transit Project Service Plan

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 are conducted consistent with the intent of Title VI as set forth in Federal Transit Administration Circular 4702.1B.

The Crenshaw LAX Light Rail Project and the Regional Connector Transit Project are new rail alignments involving federal funding that are 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 the new service plans for these lines on minority populations is required at least six months prior to start of revenue service.



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 based on race, color or national origin.

Title VI policy defines the threshold Metro will utilize when analyzing the impacts to minority riders. For service or 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.



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 minority and low-income 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, a disparate impact is deemed to have occurred.



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 changes requires Metro to evaluate alternatives and mitigate burdens where practicable.

For such 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.



Background – Crenshaw LAX Light Rail Project

- The Crenshaw LAX Light Rail Project is a new 8.5-mile light rail line with 8 new stations
- This new line extends from a junction west of Aviation/Imperial station on the C Line (Green) light rail line to the E Line (Expo) at Exposition/Crenshaw station.
- A future additional new station, the Airport Metro Connector (AMC), will provide a direct connection to the new LAX Airport People Mover System currently under construction.
- The Crenshaw LAX Line will be integrated with C Line (Green) operations consistent with the Metro Board adopted Service Operating Plan.

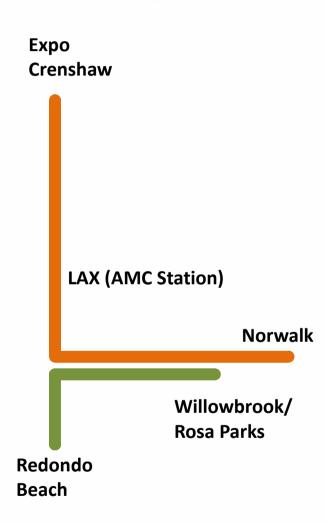




Background – Crenshaw Light Rail Service Plan

- Following a period of public outreach in 2018, the Metro Board adopted a Service Plan for the new Crenshaw LAX light rail line.
- Service would operate between Norwalk and Expo/Crenshaw Stations, with the C Line (Green) revised to operate from Willowbrook/Rosa Parks to Redondo Beach Station
- Each of these services would operate:
 - Up to 6-minute peak service weekdays
 - 12-minute off peak and weekend service
 - 20-minute evening/late night service
 - These service levels are consistent with those operated on all Metro light rail lines
- Fares to ride this new line would be the same as those for other Metro rail and bus services
- No changes to bus services are part of this plan.





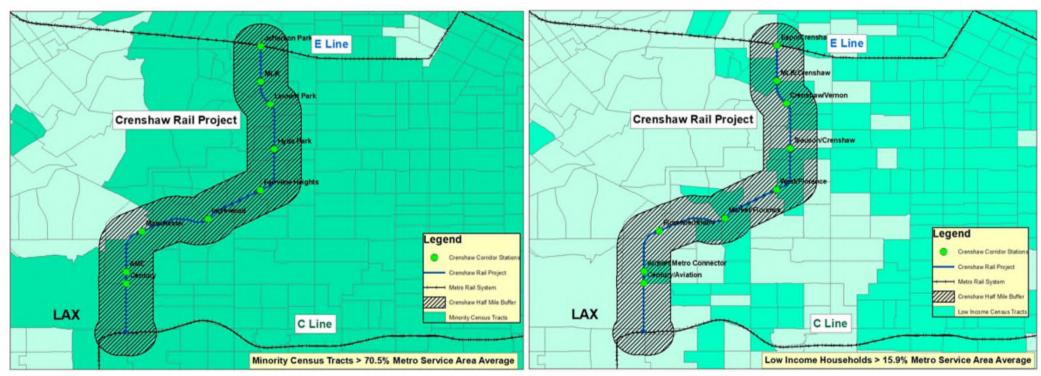
Crenshaw LAX Light Rail Phased Opening

- Due to construction of the Airport Metro Connector (AMC) rail station, the Crenshaw LAX line is anticipated to open an initial segment in late summer 2022 (based on latest construction schedule), initially serving seven stations, operating between Expo/Crenshaw and Westchester/Veterans Stations.
- A bus bridge will link the Crenshaw LAX Line at Westchester/Veterans Station to the C Line (Green) at Aviation/LAX Station.
- New Aviation/Century Station will not be served by trains until full line operation begins (expected in second half of 2023) once Airport Metro Connector Station platform structure has been completed.
- Airport Metro Connector (AMC) Station is anticipated to be ready for service in the second half of 2024.





As required under Title VI, Metro reviewed the minority and low-income populations to be served by the new 8.5-mile, 9 station Crenshaw LAX Line rail service based on population and households within 0.5 miles of the alignment.





	Population	Minority Population	Minority Percent	Households	Low Income Households	Low Income Household Percent
Crenshaw/LAX 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.



Background – Regional Connector Transit Project

- The Regional Connector Transit Project is a new 1.9-mile underground light-rail line connecting the Metro L Line (Gold) to 7th Street/Metro Center Station.
- Project includes three new underground stations in downtown Los Angeles:
 - Little Tokyo/Arts District (1st St/Central Av);
 - Historic Broadway (2nd St/Broadway); and
 - Grand Av Arts/Bunker Hill (2nd Pl/Hope St)





Background – Regional Connector Transit Project Service Plan

In 2020, the Metro Board adopted the Regional Connector Project service operation plan where:

- A Line (Blue), E Line (Expo), and L Line (Gold) will be reconfigured from three separate line operations to a two-line regional operation:
 - A Line (Long Beach Azusa)
 - E Line (Santa Monica Eastside)

Both lines will operate at service levels consistent with service on other light rail lines i.e. up to 6-minute peak weekday, 12-minute midday weekday & weekend, and 20-minute evening/late night service.

No bus service changes are part of this service plan.

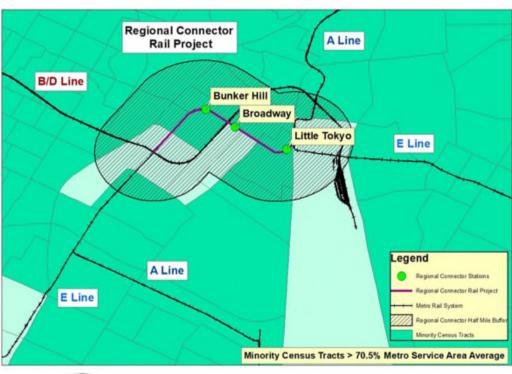
Fares would be the same as those for other Metro rail and bus services

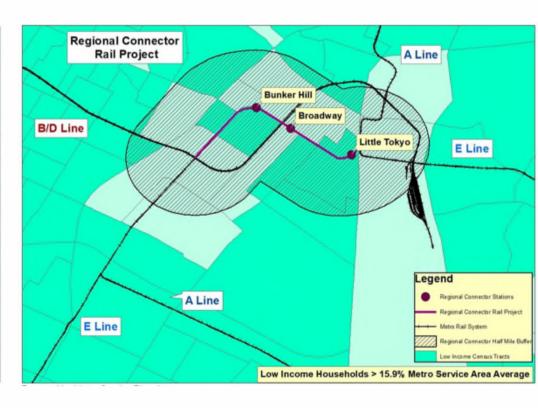
Passengers will no longer need to change trains to cross downtown LA or connect between L Line (Gold) and A Line (Blue) /E Line (Expo).





As required under Title VI, Metro has reviewed the minority and low-income populations to be served by the new 1.9-mile, 3 station Regional Connector (A and E Line) rail service based on populations and households within 0.5 miles of the alignment.







	Population	Minority Population	Minority Percent	Households	Low Income Households	Low Income Household Percent
Regional Connector Rail Project	88,478	64,918	80.7%	37,922	20,375	53.7%
Metro Service Area	9,417,605	6,634,742	70.5%	3,176,713	1,089,941	34.3%
Difference Comparison			10.2%			19.4%

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



Title VI Analysis Findings – Crenshaw & Regional Connector Rail Projects

The Service Equity Analysis shows that both Minority and Low-Income populations are impacted based on Metro's threshold at least 5% impact, as both exceed 5%. However, The Crenshaw and Regional Connector Rail Projects will create new rail lines and services, providing benefits to minority populations and low-income households that will be served by these new corridors. These benefits do not come at the expense of other transit services.

As a result, Metro concludes any disparate impact or disproportionate burden under Title VI, will not require mitigation. These projects will provide new, high-quality mobility options for the communities they will serve, which is consistent with the overall goal of these projects to improve public transit service through expanding rail service coverage across the LA region. Minority and low-income riders will be the primary beneficiaries of these projects.



Title VI Analysis Findings – Crenshaw & Regional Connector Rail Projects

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 changes 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 the Crenshaw and Regional Connector rail projects.



