

Washington Metropolitan Area Transit Authority
Board Action/Information Summary

☒ Action ☐ Information

MEAD Number:
201959

Resolution:
☒ Yes ☐ No

TITLE:

G9 Title VI Evaluation

PRESENTATION SUMMARY:

Metrobus G9 Title VI evaluation.

PURPOSE:

Approval of the Metrobus route G9 Title VI equity analysis.

DESCRIPTION:

The Board of Directors approved a one year pilot of Metrobus route G9 Rhode Island Avenue Limited service December 15, 2016, and pilot service began March 20, 2017.

The current action seeks approval of the Title VI equity analysis.

Key Highlights:

Metrobus G9 pilot service evaluated the market for, and characteristics of riders on, a new MetroExtra route funded by the District of Columbia.

The Title VI evaluation determined that the percentage of minority and low income riders on the G9 was significantly less than system averages. In order to mitigate this impact, regulations permit service improvements for a more "balanced" proposal that complies with FTA Title VI and Environmental Justice regulations. Consequently, the G9 service package will be modified to include two additional trips on the North Capitol Street (Metrobus Route 80) line.

The revised service package complies with the requirements of Title VI and Environmental Justice.

Background and History:

In 2014, a study of area bus service showed that the Rhode Island Avenue corridor could support an overall increase in service frequency, and a direct connection between this emerging market and the downtown business district.

In late 2016, with the support of the Rhode Island Avenue Main Street business group, the Council of the District of Columbia provided funding for the new MetroExtra Limited Stop service as a reimbursable demonstration project, and on December 15, 2016 the Metro Board approved a pilot of G9 service. Metro started service on the route March 20, 2017.

Discussion:

The Federal Transit Administration (FTA) requires an equity analysis of all major service changes (including new service) to ensure that benefits are distributed equitably with regard to minority and low-income customers. The pilot phase of G9 service provided the opportunity to conduct a passenger survey to collect data about G9 riders.

The Federally mandated Title VI equity analysis showed that during the pilot phase the percentage of minority and low income riders using the G9 was significantly less than the corresponding system averages and would, if not mitigated, trigger a disparate impact (DI) on minority populations and a disproportionate burden (DB) on low income populations. Therefore, in accordance with Title VI regulations, staff took action to modify the service proposal. The G9 service plan will remain unchanged from the pilot, with the same frequency and span of service. However, the service package will now include two additional trips on the North Capitol Street line, Metrobus Route 80. This addition leads to a considerably more “balanced” service proposal that benefits a considerably higher ratio of minority and low income customers.

As revised, the proposal complies with the requirements of Title VI and Environmental Justice (EJ) and no longer presents a DI on minority populations. There is still a DB on low income populations; however, in accordance with FTA regulations, it has been significantly mitigated by the additional trips on Metrobus Route 80 on North Capitol Street.

To increase awareness and ridership for the route, various outreach efforts distributed more than 3,200 materials about the G9. Communications and outreach procedures carefully followed the Public Participation Plan guidance. The full Public Outreach report is attached.

FUNDING IMPACT:

This action, to approve the Title VI analysis, is not a budget action. Any discussion concerning G9 funding in upcoming fiscal years, the adoption of the route into the permanent service plan, or the G9 status as "regional" or "non-regional" designated route will be considered in a separate action.

TIMELINE:

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Previous Actions	<p>December 2016 – Board of Directors authorized a reimbursable project agreement for pilot service on Metrobus G9 Rhode Island Avenue Limited.</p> <p>March 2017 – Pilot service on Metrobus G9 Rhode Island Avenue Limited began.</p>
Anticipated actions after presentation	March 2018 - Approval of the Title VI report.

RECOMMENDATION:

Approval of the Title VI equity analysis.

SUBJECT: APPROVAL OF G9 TITLE VI ANALYSIS

RESOLUTION
OF THE
BOARD OF DIRECTORS
OF THE
WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY

WHEREAS, The Federal Transit Administration (FTA) requires the Washington Metropolitan Area Transit Authority (WMATA) to conduct an equity analysis to determine if a major service change will result in a disparate impact (DI) on minority riders or a disproportionate burden (DB) on low-income riders; and

WHEREAS, In Resolution 2016-54, the Board of Directors authorized the General Manager/Chief Executive Officer to negotiate and execute a reimbursable project agreement for a pilot for a new Metrobus G9 route with service along Rhode Island Avenue connecting downtown DC with Eckington, Brentwood and upper Rhode Island Avenue; and

WHEREAS, A Title VI equity analysis shows that the Metrobus G9 service, when combined with additional service on Metrobus route 80 North Capitol Street line, will not result in a DI on minority populations; and

WHEREAS, A Title VI equity analysis also shows that the Metrobus G9 may disproportionately benefit non-low-income customers and result in a DB on low-income populations, but that such result will be significantly mitigated by the additional service on Metrobus route 80 North Capitol Street line; and

WHEREAS, Accordingly, the Metrobus G9 does not violate Title VI or Environmental Justice because: (1) it does not result in any reduction or elimination of benefits to Metro customers, as implementing this service does not come at the expense of reductions of service on other routes; (2) the revised proposal does not result in a DI on minority populations; and (3) the DB will be mitigated as much as practically possible; NOW, THEREFORE, be it

RESOLVED, That the Board of Directors approves the Title VI equity analysis in Attachment A; and be it finally

RESOLVED, That this Resolution shall be effective 30 days after adoption in accordance with § 8(b) of the WMATA Compact.

Reviewed as to form and legal sufficiency,



Patricia Y. Lee
General Counsel

WMATA File Structure No.:
6.6.4 Bus Route and Service Planning

PROPOSED

M E M O R A N D U M



SUBJECT: Title VI Equity Analysis – Metrobus
Route G9

DATE: March 9, 2018

FROM: OEE0 – James T. Wynne, Jr.

THRU: IBOP – John Kuo

TO: GM/CEO – Paul J. Wiedefeld

This memorandum describes the methodology and findings of the Title VI equity analysis required for Metrobus Route G9.

I. Conclusion

Metro staff recommends the acceptance of the Title VI equity analysis of the G9 route, which serves the Rhode Island Avenue corridor in the District of Columbia. Rhode Island Avenue has been designed as part of the Priority Corridor Network (PCN). In recent years, the corridor has seen rapid growth in terms of both residential and commercial uses. In 2014, a study of bus service in the area showed that the corridor could support an overall increase in service frequency, and a direct connection between this emerging market and the downtown business district. In late 2016, with the support Rhode Island Avenue Main Street business group, the Council of the District of Columbia provided funding for the new service as a reimbursable demonstration project. Metro started the service in March of 2017 as a pilot. To date, route G9 has an average weekday ridership of more than 600 customers and continues to grow.

The Federal Transit Administration (FTA) requires an equity analysis of all major service changes (including new service) to ensure that benefits are distributed equitably with regard to minority and low-income customers. Staff is seeking Board approval of this equity analysis as a stand-alone item. The conclusion of the pilot program and adoption of the future continuation of service as permanent itself (and including the proposed mitigation referenced below) is-are contingent upon FY 2019 budget approval.

Results from an on-board survey showed that during the pilot phase the percentage of minority and low-income ridership using the G9 was significantly less than the corresponding system averages and would, if not mitigated, trigger a disparate impact (DI) on minority populations and a disproportionate burden (DB) on low-income populations. In accordance with the FTA Title VI Circular (FTA C 4702.1B), staff took action to modify the proposal. As revised, the proposal complies with the requirements of Title VI and Environmental Justice (EJ).

The revised proposal no longer presents a DI on minority populations. There is

still a DB on low-income populations; however, in accordance with the FTA Circular, it has been significantly mitigated. Adoption of the equity analysis does not violate Title VI or EJ because: (1) the revised proposal does not result in any reduction or elimination of benefits to Metro customers, as implementing this service does not come at the expense of reductions of service on other routes; (2) the revised proposal does not result in a disparate impact on minority populations; and (3) the disproportionate burden has already been mitigated as much as practically possible.

II. Metrobus Service Change Proposal

Changes in bus service are needed periodically to maintain reliable service, meet changing customer demand, improve efficiency, serve new markets, and implement study recommendations. The G9 is just that, a new service aimed at responding to increased demand in a part of the District experiencing growth. The service “overlays” on existing local bus service in the corridor, augmenting the current frequency of bus service when it is needed the most, during peak periods. The service also provides something that the existing local bus services do not, a single-seat ride from this area into downtown. Without the G9, customers on the local buses have to transfer at Rhode Island Avenue Metrorail station either to Metrorail or another Metrobus line in order to connect to downtown.

The service operates on weekdays during peak periods, 6:00 AM to 9:00 AM, and 3:00 PM to 7:00 PM. The service has broad public support. Approximately 87 percent of those surveyed felt the service is “good” or “very good.” The full Public Outreach report will be attached to the Board Action/Information Summary (BAIS).

III. Title VI Analysis

When a transit agency proposes a major service change, including additions to service, the FTA, in its Title VI Circular 4702.1B, requires that the transit agency conduct an equity analysis to determine whether the service change will result in a disparate impact (DI) on minority riders or a disproportionate burden (DB) on low-income riders.

The Title VI Circular allows agencies to implement service changes lasting less than twelve months without conducting an equity analysis. Chapter IV-13. WMATA implemented this route in March 2017 to evaluate the performance of the route, collect customer survey data, and conduct public outreach.

In conducting this equity analysis, Metro used the following survey and operations data to determine which populations would be affected by the proposed service change:

- Metrobus Farebox data (FY 2017 and FY 2018)
- Metrobus Ridecheck data (Spring and Fall 2017 Schedule Periods)
- G9 Metrobus Survey (Administered November 2017)
- Metrobus Passenger Survey (2014)

Metro calculated the number of minority and low-income G9 trips as a percentage of all G9 trips. Because the proposed service change affects bus customers, Metro then compared that percentage to the system-wide profile for Metrobus (81.5 percent minority; 52 percent low-income) as shown in Table One.

Table One: Metrobus Ridership Bus Demographic Profile¹

	Annual Ridership (FY 2017)	% Minority Ridership	% Low-Income Ridership	Annual Minority Trips	Annual Low-Income Trips
Metrobus	120,858,700	81.5%	52.0%	98,454,600	62,821,800

To determine whether or not the proposed service change would result in a DI on minority populations or a DB on low-income populations, staff applied the Board adopted DI/DB thresholds (Resolution 2013-27) that correspond to the number of daily impacted riders. (See Table Two). Average daily ridership from fall of 2017 on the G9 was approximately 600 riders. Thus, the DI/DB threshold of eight percent was used for the analysis.

Table Two: DI/DB Thresholds

Total Daily Riders Impacted	Threshold for Significant Disparity
Up to 10,000	8%
10,001 to 20,000	7%
20,001 to 40,000	6%
Over 40,000	5%

According to the survey data, 72.8 percent of the G9 riders are minority and 34 percent are low-income. As shown in Table Three, as initially proposed, the proportion of minority G9 customers is 8.7 percent lower than the system average (72.8 percent compared to 81.5 percent), and the proportion of low-income customers is 18 percent lower than the system average (34 percent compared to 52 percent). Given that these differences exceed the eight percent DI/DB

¹ Based on 2014 Metrobus Passenger Survey

thresholds, staff began the process of identifying ways to modify the proposal.

Table Three – Demographic Summary, Initial Proposal

	Minority Impacted Trips	Low-Income Impacted Trips
Impacted Ratio	72.8%	34.0%
System Average	81.5%	52.0%
Difference	-8.7%	-18.0%

After review of ridership, operating cost, and demographics of other services in the area, staff recommends the following revision to the original proposal:

- Add two afternoon trips on Metrobus Route 80

As proposed, G9 service would remain unchanged from the pilot, with the same frequency and span of service. However, the service package analyzed now includes additional service on Route 80. This addition would lead to a considerably more “balanced” service proposal in that it would benefit a considerably higher ratio of minority and low-income customers.

As show in Table Four, this revised proposal benefits minority riders at a rate 6.9 percent lower than the system average (74.6 percent compared to 81.5 percent), and low-income riders at a rate 14.9 percent lower than the system average (37.1 percent compared to 52 percent). Thus, the revised proposal does not result in a DI on minority riders (as the difference falls below the eight percent threshold) but does still present a DB to low-income populations (with a difference of more than fourteen percent).

Table Four – Revised Proposal

	Minority Impacted Trips	Low-Income Impacted Trips
Impacted Ratio	74.6%	37.1%
System Average	81.5%	52.0%
Difference	-6.9%	-14.9%
Threshold	-8.0%	-8.0%
Exceeds Threshold	No	Yes

Title VI and EJ Circular Requirements

Although the revised proposal exceeds the Board adopted DB threshold for low-income populations, implementing this service change does not violate Title VI or Environmental Justice (EJ). Under Title VI and EJ, Metro may approve an equity analysis that will result in a DB on low-income populations if Metro implements practicable mitigation measures. When determining whether mitigation measures are practicable, Metro must consider the social, economic (including costs), and environmental effects of mitigating the adverse effects on low-income populations. See Pg. 5 of the FTA EJ Circular 4703.1.

Metro has met the criteria for a “practical” mitigation, specifically:

1. **The proposed mitigation (adding two afternoon trips on Metrobus Route 80) benefits a considerable amount of people, almost all of whom are either minority or low-income.** Using survey data, staff estimates that ridership on new Route 80 service will be comprised of a customer base that is 95 percent minority and more than 70 percent low-income. Staff conservatively estimates that the two new trips on Route 80 will each have a ridership of 25 trips for a total of 50 daily customers. These two facts taken together (a high expected ridership per unit of service and a high concentration of minority and low-income customers), means that the mitigation will be a very effective use of resources.
2. **The proposed mitigation fits within existing cost constraints.** As stated in the EJ Circular, cost can be a factor when determining the practicality of a given mitigation. See Pg. 5 of the FTA EJ Circular 4703.1. The additional operating cost of the two Route 80 trips is offset in part by a reduction in spread time, by the ability to interline the service with that of another route. However, further mitigations would require a significant increase in operating cost and/or significant reductions in other service to offset their cost.

Note that the implementation of the mitigation (additional service on Metrobus Route 80) will take place in June, 2018, as this is the closest Metrobus operator pick to the end of the twelve month (March 2017 to March 2018) pilot period. The FTA concurs that June is a reasonable time-frame for implementation.²

² Telephone discussion between Metro staff and staff from FTA Region III, FTA Office of Civil Rights, and FTA Office of the Chief Counsel; February 13, 2018.