

TITLE VI PROGRAM

IN COMPLIANCE WITH FTA CIRCULAR 4702.1B



January 2020



The Council's mission is to foster efficient and economic growth for a prosperous metropolitan region.

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The Metropolitan Council is the regional planning organization for the seven-county Twin Cities area. The Council operates the regional bus and rail system, collects and treats wastewater, coordinates regional water resources, plans and helps fund regional parks, and administers federal funds that provide housing opportunities for low- and moderate-income individuals and families. The 17-member Council board is appointed by and serves at the pleasure of the governor.

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Introduction

The purpose of the Metropolitan Council's Title VI Program is to ensure that no person, on the grounds 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 under the control of the Metropolitan Council. The Metropolitan Council will ensure that members of the public within the Metropolitan Council service area are aware of Title VI provisions and the responsibilities associated Title VI of the Civil Rights Act of 1964.

A note on the language and terminology used in this report: Many of the terms used in this report such as “minority” and “low-income” may not be consistent with efforts by Metro Transit and the Metropolitan Council to use respectful and inclusive language. However, these terms are used in this report to match the terminology used in the FTA Title VI Circular and other federal guidance.

Metropolitan Council

The Metropolitan Council is the regional policy-making body, metropolitan planning organization (MPO), and provider of essential services for the Twin Cities metropolitan region. The Council's mission is to foster efficient and economic growth for a prosperous region.

The 17-member Metropolitan Council is a policy board, which has guided and coordinated the strategic growth of the metro area and achieved regional goals for more than 50 years. Elected officials and residents share their expertise with the Council by serving on key advisory committees.

The Council also provides essential services and infrastructure – Metro Transit's bus and rail system, Metro Mobility, Transit Link, wastewater treatment services, regional parks, planning, affordable housing, and more – that support communities and businesses and ensure a high quality of life for residents. The Council's roles as provider of transit service and designated metropolitan planning organization for transportation planning purposes are the focus of this FTA Title VI Program.

Metro Transit

Metro Transit is an operating division of the Metropolitan Council and offers an integrated network of buses, light rail transit, and commuter trains, as well as resources for those who carpool, vanpool, walk, or bike. The largest public transit operator in the region, Metro Transit provides approximately 85% of the transit trips taken annually in the Twin Cities. Metro Transit served nearly 81 million bus and rail passengers in 2018 with award-winning, energy-efficient fleets.

Metro Transit operates the METRO Green Line, METRO Blue Line, Northstar commuter rail line and 127 bus routes, using a fleet of about 920 buses and 100 rail vehicles. In the last three years, Metro Transit opened the METRO A and C lines, two bus rapid transit (BRT) lines that provide faster service and a more comfortable ride. Several more BRT lines are in development as Metro Transit seeks to expand the region's METRO network. Metro Transit continues to develop and refine local and enhanced service throughout the region.

Other Transportation Services

The Metropolitan Council's Metropolitan Transportation Services (MTS) division oversees operations of Metro Mobility, Transit Link, and contracted regular bus routes.

MTS contracted regular bus routes are operated by private providers using Council-owned vehicles. However, these routes have regional branding and are subject to the same policies as Metro Transit

regular bus routes. For the purposes of Title VI, regional contracted routes are treated like any other Metro Transit regular bus route, unless otherwise noted.

The Metropolitan Council also provides services that meet the needs of those either not served by or not able to use Metro Transit routes.

Metro Mobility is a shared public transportation service for certified riders who are unable to use regular route service due to a disability or health condition. Eligibility is determined by the federal Americans with Disabilities Act. Rides are provided for any purpose. Customers are eligible for Metro Mobility service if they are physically unable to get to the regular route bus or train, they are unable to navigate regular route systems once they are on board, or they are unable to board and exit the bus or train at some locations.

Transit Link is the Twin Cities dial-a-ride shared bus service. It provides transportation to the public where regular route transit service is not available. Transit Link is for trips that cannot be accomplished on regular transit routes alone and may combine with regular route. Anyone may reserve a Transit Link ride for any purpose, subject to availability.

Title VI Requirements

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance. Title VI states that “no person in the United States shall, on the grounds 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.”

In 1994, President Bill Clinton issued Executive Order 12898, which states that each federal agency “shall make achieving environmental justice part of its mission by identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.”

To that end, the Federal Transit Administration (FTA) issued Circular 4702.1B in 2012, which replaced Circular 4702.1A issued in 2007. This document outlines Title VI and Environmental Justice compliance procedures for recipients of FTA-administered transit program funds.

Specifically, FTA requires recipients, including the Metropolitan Council, to “document their compliance with DOT’s [United States Department of Transportation’s] Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three years or as otherwise directed by FTA. For all recipients (including subrecipients), the Title VI Program must be approved by the recipient’s board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA.”

The Metropolitan Council’s Title VI Program is divided into three parts:

- **Part 1** focuses on general requirements applicable to all FTA recipients.
- **Part 2** focuses on the requirements specific to operators of regular route transit service. This section is limited to the planning and operations of Metro Transit.
- **Part 3** focuses on the requirements specific to the Metropolitan Council as the designated metropolitan planning organization.

Definitions

The following terms and definitions are from FTA Circular 4702.1B unless noted otherwise.

Designated recipient means an entity designated, in accordance with the planning process under sections 5303 and 5304, by the governor of a state, responsible local officials, and publicly owned operators of public transportation, to receive and apportion amounts under section 5336 to urbanized areas of 200,000 or more in population; or a state or regional authority, if the authority is responsible under the laws of a state for a capital project and for financing and directly providing public transportation.

Discrimination refers to any action or inaction, whether intentional or unintentional, in any program or activity of a federal aid recipient, subrecipient, or contractor that results in disparate treatment, disparate impact, or perpetuating the effects of prior discrimination based on race, color, or national origin.

Disparate impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

Disproportionate burden refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.

Disparate treatment refers to actions that result in circumstances where similarly situated people are intentionally treated differently (i.e., less favorably) than others because of their race, color, or national origin.

Fixed guideway means a public transportation facility—using and occupying a separate right-of-way for the exclusive use of public transportation; using rail; using a fixed catenary system; for a passenger ferry system; or for a bus rapid transit system.

Fixed route refers to public transportation service provided in vehicles operated along pre-determined, regular routes according to a fixed schedule.

Federal financial assistance refers to:

- Grants and loans of federal funds;
- The grant or donation of federal property and interests in property;
- The detail of federal personnel;
- The sale and lease of, and the permission to use (on other than a casual or transient basis), federal property or any interest in such property without consideration or at a nominal consideration, or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale or lease to the recipient; and
- Any federal agreement, arrangement, or other contract that has as one of its purposes the provision of assistance.

Limited English Proficiency (LEP) persons refers to people for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

Low-income person means a person whose median household income is at or below the U.S. Department of Health and Human Services poverty guidelines.

Metropolitan planning organization (MPO) means the policy board of an organization created and designated to carry out the metropolitan transportation planning process.

Metropolitan transportation plan means the official multimodal transportation plan addressing no less than a 20-year planning horizon that is developed, adopted, and updated by the metropolitan planning organization through the metropolitan transportation planning process.

Minority persons include the following identities:

- American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
- Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
- Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
- Hispanic or Latino, which includes people of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- Minority population means any readily identifiable group of minority people who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations (such as migrant workers or Native Americans) who will be similarly affected by a proposed DOT program, policy, or activity.

Minority transit route means a route that has at least one-third of its total revenue mileage in a census block or block group, or traffic analysis zone(s) with a percentage of minority population that exceeds the percentage of minority population in the transit service area. A recipient may supplement this service area data with route-specific ridership data in cases where ridership does not reflect the characteristics of the census block, block group, or traffic analysis zone.

National origin means the particular nation in which a person was born, or where the person's parents or ancestors were born.

Noncompliance refers to an FTA determination that the recipient is not in compliance with the DOT Title VI regulations, and has engaged in activities that have had the purpose or effect of denying individuals the benefits of, excluding from participation in, or subjecting individuals to discrimination in the recipient's program or activity on the basis of race, color, or national origin.

Predominantly low-income area means a geographic area, such as a neighborhood, census tract, block or block group, or traffic analysis zone, where the proportion of low-income people residing in that area exceeds the average proportion of low-income people in the recipient's service area.

Predominantly minority area means a geographic area, such as a neighborhood, census tract, block or block group, or traffic analysis zone, where the proportion of minority people residing in that area exceeds the average proportion of minority people in the recipient's service area.

Primary recipient means any FTA recipient that extends federal financial assistance to a subrecipient.

Public transportation means regular, continuing shared-ride surface transportation services that are open to the any individual or open to a segment of the general populace defined by age, disability, or low income; and does not include Amtrak, intercity bus service, charter bus service, school bus service, sightseeing service, courtesy shuttle service for patrons of one or more specific establishments, or intra-terminal or intrafacility shuttle services. Public transportation includes buses, subways, light rail, commuter rail, monorail, passenger ferry boats, trolleys, inclined railways, people movers, and vans. Public transportation can be either regular, fixed route or demand-response service.

Recipient means any public or private entity that receives federal financial assistance from FTA, whether directly from FTA or indirectly through a primary recipient. This term includes subrecipients, direct recipients, designated recipients, and primary recipients. The term does not include any ultimate beneficiary under any such assistance program.

Service area refers either to the geographic area in which a transit agency is authorized by its charter to provide service to the public, or to the planning area of a state department of transportation or metropolitan planning organization.

Service standard/policy means an established service performance measure or policy used by a transit provider or other recipient as a means to plan or distribute services and benefits within its service area.

Statewide transportation improvement program (STIP) means a statewide prioritized listing/program of transportation projects covering a period of four years, that is consistent with the long-range statewide transportation plan, metropolitan transportation plans, and transportation improvement program (TIP), and is required for projects to be eligible for funding under title 23 U.S.C. and title 49 U.S.C. Chapter 53.

Subrecipient means an entity that receives federal financial assistance from FTA through a primary recipient.

Title VI Program refers to a document developed by an FTA recipient to demonstrate how the recipient is complying with Title VI requirements. Direct and primary recipients must submit their Title VI Programs to FTA every three years. The Title VI Program must be approved by the recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA.

Transportation improvement program (TIP) means a prioritized listing/program of transportation projects covering a period of four years that is developed and formally adopted by an MPO as part of the metropolitan transportation planning process, consistent with the metropolitan transportation plan, and required for projects to be eligible for funding under title 23 U.S.C. and title 49 U.S.C. Chapter 53.

Transportation management area (TMA) means an urbanized area with a population of more than 200,000, as defined by the U.S. Census Bureau and designated by the U.S. secretary of transportation, or any additional area where TMA designation is requested by the governor and the MPO and designated by the U.S. secretary of transportation.

Part 1: General Requirements

The Title VI Circular requires all recipients of FTA funding to meet a number of basic requirements. The requirements that are addressed include:

- Prepare and submit a Title VI Program
- Notify beneficiaries to protection under Title VI
- Develop Title VI complaint procedures and complaint form
- Record and report transit-related Title VI investigation, complaints, and lawsuits
- Promote inclusive public participation
- Provide meaningful access to persons with limited English proficiency
- Monitor and provide assistance to subrecipients

Title VI Notice and Complaint Procedures

The Title VI Circular provides the following direction regarding public notice of Title VI protections:

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, recipients shall disseminate this information to the public by posting a Title VI notice on the agency's website and in public areas of the agency's office(s), including the reception desk, meeting rooms, etc. Recipients should also post Title VI notices at stations or stops, and/or on transit vehicles.

The Metropolitan Council and Metro Transit provide notice of Title VI protections through a variety of means. Detailed information and instructions for filing a Title VI complaint are available at the following web addresses:

- Metropolitan Council: <https://metro council.org/About-Us/What-We-Do/Office-of-Equal-Opportunity/Discrimination-Complaints/Public-Service-Discrimination/Discrimination-and-Title-VI.aspx>
- Metro Transit: www.metrotransit.org/TitleVI

All Metro Transit buses are equipped with a large, poster-sized placard that includes this statement, brief instructions for how to file a Title VI complaint, and phone numbers for requesting additional information. All Metro Transit light rail and commuter rail trains, regional contracted routes, Metro Mobility, and Transit Link vehicles are equipped with a prominent sticker with this same information. Additionally, a poster-sized flyer with this Title VI information is provided at the front desks of the Metropolitan Council and Metro Transit administrative buildings. Examples of these notices are provided in Attachment A.

Complaint Procedures

The Title VI Circular provides the following direction regarding Title VI Complaint procedures:

In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), all recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form, and the form and procedure for filing a complaint shall be available on the recipient's website.

The Metropolitan Council posts its Title VI complaint procedures on its website. Metro Transit's Title VI web page also includes a link to these procedures. The Title VI complaint procedures are as follows:

1. Any individual, group of individuals, or entity who believes they have been subjected to discrimination prohibited by Title VI nondiscrimination provisions may file a written complaint with the Council's Office of Equal Opportunity (OEO). The complaint must meet the following requirements:
 - a. Complaint shall be in writing and signed by the complainant(s).
 - b. Include the date of the alleged act of discrimination (the date when the complainant(s) became aware of the alleged discrimination, the date on which that conduct was discontinued, or the latest instance of the conduct).
 - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complained-of incident.
 - d. Allegations received by fax or e-mail will be acknowledged and processed, once the identities of the complainant(s) and the intent to proceed with the complaint have been established. The complainant is required to mail a signed, original copy of the fax or e-mail transmittal for the Council to be able to process it.
 - e. Allegations received by telephone will be reduced to writing and provided to complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for them to complete, sign, and return to the Council for processing.
2. Upon receipt of the complaint, the director of equal opportunity or director's designee will determine its jurisdiction, acceptability, and need for additional information, as well as investigate the merit of the complaint. In cases where the complaint is against one of the Council's sub-recipients of federal funds, the Council will assume jurisdiction and will investigate and adjudicate the case. Complaints against the Council will be referred to FTA or the appropriate federal agency for proper disposition pursuant to their procedures.
3. In order to be accepted, a complaint must meet the following criteria:
 - a. The complaint must be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant.
 - b. The allegation(s) must involve a covered basis such as race, color, national origin.
 - c. The allegation(s) must involve a program or activity of a federal-aid recipient, sub-recipient, or contractor.
4. A complaint may be dismissed for the following reasons:
 - a. The complainant requests the withdrawal of the complaint.
 - b. The complainant fails to respond to repeated requests for addition information needed to process the complaint.
 - c. The complainant cannot be located after reasonable attempts.

5. Once the Council decides to accept the complaint for investigation, the complainant and the respondent will be notified in writing of such determination within seven calendar days. The complaint will receive a case number and will then be logged into the Council's records, identifying its basis and alleged harm.
6. In cases where the Council assumes the investigation of the complaint, the Council will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have 10 calendar days from the date of the Council's written notification of acceptance of the complaint to furnish their response to the allegations.
7. The Council's final investigative report and a copy of the complaint will be forwarded to the appropriate federal agency and affected parties within 60 calendar days of the acceptance of the complaint.
8. The Council will notify the parties of its final decision.
9. If complainant is not satisfied with the results of the investigation of the alleged discrimination and practices the complainant will be advised of the right to appeal to the appropriate federal agency.

Shown in Attachment B, the Title VI Complaint Form is available on the Metropolitan Council and Metro Transit websites. Translations of the complaint instruction and complaint form are available on the website in Hmong, Karen, Somali, Spanish, and Vietnamese.

Title VI Investigations, Complaints, and Lawsuits

The Title VI Circular states the following regarding Title VI investigations, complaints, and lawsuits:

In order to comply with the reporting requirements of 49 CFR Section 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by entities other than FTA; lawsuits; and complaints naming the recipient.

The Metropolitan Council has received one Title VI-related complaint since 2017. On Nov. 8, 2018, a customer service call was received by a caller representing a community organization with an inquiry about the reduction of bus service after 9 p.m. on a segment of Route 16 that would be effective Dec. 1, 2018. The complainant was provided with a summary of information taken into consideration in making the decision including: minimal service reduction, the decline of ridership after service implemented on the METRO Green Line LRT, and alternative local routes. A follow-up service call was conducted with the caller. The caller inquired if any staff of color were involved in making the decision about the service change. The customer service complaint was closed on Nov. 12, 2018. The Council's Office of Equal Opportunity (OEO) received the complaint to determine if any additional action was warranted. During that time, the Metropolitan Council's Equity Advisory Committee inquired about the policy related to service changes, with a specific interest in Route 16. OEO coordinated with Metro Transit to prepare a written presentation for the Metropolitan Council's Equity Advisory Committee to review the policy and all December 2018 service changes including Route 16. No further action was warranted.

Public Engagement

The Metropolitan Council has adopted several policies and practices to ensure the needs of community stakeholders are centered in all Council decisions. The various policies and methods used by the Council and Metro Transit to authentically and meaningfully engage minority and limited English proficient (LEP) populations are summarized below.

Public Engagement Plan

The Metropolitan Council created its Public Engagement Plan in 2015 (Attachment C). It is one of many pieces necessary to implement the *Thrive MSP 2040* long-range plan, including the *2040 Transportation Policy Plan*. It establishes principles and processes for public engagement to ground Council decisions in the needs of community stakeholders and to engage people in the decision-making process.

The Public Engagement Plan is guided by the principles in the *Thrive MSP 2040* plan – namely the commitment to equity and equitable development for our region. In addition, it builds on best practices and collective knowledge of community organizations and the public. Some of these key principles and best practices include involving communities in helping plan outreach and engagement efforts, as well as building capacity within communities – particularly communities of color and tribal communities – to provide leadership and advocate in public decision-making processes. The Council’s Public Engagement Plan reflects a shift in the Council’s outreach efforts to specifically engage the public, particularly historically underrepresented communities, in steering engagement efforts and participating early in a planning process to have real and sustained influence over the process. In this context, “historically underrepresented communities” include communities of color, tribal, indigenous, immigrant and LEP communities, and people who have disabilities.

In addition, the following principles are highlighted in the Public Engagement Plan:

- **Equity:** Residents and communities are partners in decision-making.
- **Respect:** Residents and communities should feel heard and their interests included in decisions.
- **Transparency:** Residents and communities should be engaged in planning and decisions should be open and widely communicated.
- **Relevance:** Engagement occurs early and often throughout a process to assure the work is relevant to residents and communities.
- **Accountability:** Residents and communities can see how their participation affects the outcome; specific outcomes are measured and communicated.
- **Collaboration:** Engagement involves developing relationships and understanding the value residents and communities bring to the process. Decisions should be made with people, not for people.
- **Inclusion:** Engagement should remove barriers to participation that have historically disengaged residents and communities (this includes potential language needs).
- **Cultural Competence:** Engagement should reflect and respond effectively to racial, ethnic, cultural, and linguistic experiences of residents and communities.

While the Public Engagement Plan identifies engagement strategies that reflect commonly used practices in regional planning efforts, as well as communications and engagement practices, it is intended to put the spotlight on emerging and more robust strategies that focus on the idea that public engagement efforts strengthen planning processes and help create better results. Strategies will be considered and planned as appropriate for various efforts – some strategies will not work for certain

projects or on an ongoing basis. This plan also recognizes the value of long-term relationship building between the Council, local governments and local officials, and the community at-large.

Ultimately, all the Council's outreach efforts are intended to inform the decision-making process—whether for the full Metropolitan Council, its standing committees, or its advisory committees. Recent transportation outreach efforts to promote inclusive public participation in planning and decision-making can be found within several of the transit operating divisions and the Council's long-range planning areas.

A specific focus of the Council's engagement work is removing barriers to participation and assuring people most affected by a decision can influence it. To that end, the Council has dedicated resources to translate materials when necessary to encourage and enhance participation, and to provide interpreters at events. We also proactively partner with organizations connected to communities whose first language is not English to assure more intentional inclusion where possible. These resources are available for all Council-wide engagement and customer-related activities.

The Council also adopted a document required by federal law to guide participation in long-range transportation planning efforts called the Transportation Public Participation Plan (see Attachment D). This document includes references to the Council's Public Engagement Plan, but more specifically identifies the key planning processes of the Council as the designated metropolitan planning organization for the Twin Cities region and how people can be involved in shaping those plans.

Engagement for Policy Plans and Programs

The Metropolitan Council engages community in the development of policy and programming plans, including the Transportation Policy Plan, the Regional Solicitation process, Transportation Improvement Program, and the studies included in the Unified Planning Work Program.

Transportation Policy Plan

The Transportation Policy Plan sets policies and investment guidance for the regional transportation system, based on the goals and objectives in *Thrive MSP 2040*, the region's development guide. The transportation plan is one of three major systems plans that result from *Thrive MSP 2040*. It also responds to federal planning guidance provided in the Moving Ahead for Progress of the 21st Century Act, known as MAP-21. The Transportation Policy Plan reflects a combination of technical analysis and policy discussion. The plan builds on *Thrive MSP 2040* and its extensive public engagement process, on previous regional transportation plans, studies of significant regional transportation issues, discussion and feedback from policymakers throughout the region, and ideas and feedback from other regional stakeholders.

This transportation plan was built on the extensive outreach and engagement activities that informed the development of *Thrive MSP 2040*. In developing *Thrive MSP 2040*, the Council engaged thousands of residents throughout the region, including targeted community engagement with historically underrepresented communities. In addition, this plan and its related elements were created in collaboration with technical subject matter experts and policymakers who serve the Transportation Advisory Board (TAB) and its technical advisory committees. The members of TAB and the technical committees reflect all levels of government (city, county, regional, state, federal) and interested parties who represent different transportation modes and community interests.

The Transportation Policy Plan strategies listed under the "Healthy and Equitable Communities" goal commit the Metropolitan Council and its regional transportation partners to foster public engagement in all systems planning and project development. Projects in the *2040 Transportation Policy Plan Work*

Program, and related studies performed by local government partners, the Metropolitan Council and the Minnesota Department of Transportation (MnDOT) since 2015, are included as public engagement. These studies led to changes in regional policy or adjustments to the 2018 update to the 2040 Transportation Policy Plan.

(The *2040 Transportation Policy Plan* was adopted in 2015, updated in 2018 and amended twice in 2019.)

Those studies included the following:

- MnPASS corridors
- Principal Arterials Intersection Conversion
- Truck Freight
- Minnesota State Highway Investment Plan
- Congestion Management Safety Plan
- Highway 169
- Transportation System Performance Evaluation
- Riverview Corridor
- Rush Line Corridor
- West Broadway Transit Corridor

The study-based engagement resulted in:

- More than 14,500 people engaged
- More than 600 stakeholders involved
- Nearly 300 meetings or interactions

The following communities and interest groups engaged along the way:

- Communities of color
- People with disabilities
- Immigrant and refugee groups
- Other racial and ethnic groups
- LGBTQ communities
- Low-income communities
- Transit-dependent populations
- Senior populations

Methods used include:

- Visualization techniques
- Open houses
- Stakeholder meetings
- Online tools
- Bus-stop outreach
- Focus groups
- One-on-one and small group meetings
- Workshops
- Townhall-style meetings

- Pop-up meetings
- Listening sessions
- Surveys

The 2018 draft update to the *2040 Transportation Policy Plan* was released for public comment on June 28, 2018. Public comment was received through August 13, 2018. A public hearing was conducted on August 1, 2018.

During the public comment period, nearly 300 comments were received from about 150 organizations and individuals, including 25 people who testified at the August 1 public hearing. A complete summary of the public comment period is posted at [https://metro council.org/Transportation/Planning-2/Key-Transportation-Planning-Documents/Transportation-Policy-Plan-\(1\).aspx](https://metro council.org/Transportation/Planning-2/Key-Transportation-Planning-Documents/Transportation-Policy-Plan-(1).aspx).

Among the dominant themes from the public comment process were a number of elements related to transportation operations. Issues included:

- Advocating for a conversion to an electric-powered bus fleet by 2030
- Concern over police presence on the transit system, for general policing and fare enforcement
- Advocating for no/low fares and better promotion of the Transit Assistance Program, a low-income fare program offered by Metro Transit

These concerns were addressed within the final version of the updated transportation plan, adopted by the Council in October 2018.

Regional Solicitation

The Regional Solicitation is a process that allocates federal transportation funds to locally initiated projects to meet regional transportation needs. The Council, as the designated metropolitan planning organization (MPO), works with the Transportation Advisory Board (TAB) to review and allocate these funds, using an objective, data-driven, transparent process. Projects selected through the Regional Solicitation also end up in the Transportation Improvement Program. Funds are typically awarded on a two-year cycle. Specific constituencies include MnDOT, counties, school districts, and cities in the region.

The Council and the TAB recommended federal funding for locally initiated projects in both late 2017 and early 2019, following extensive review, evaluation, and public engagement processes. The process for the next round of funding was released for public feedback in September 2019.

Transportation Improvement Program

The Transportation Improvement Program (TIP) is a staged, four-year, multimodal program of highway, transit, bicycle, pedestrian and transportation enhancement projects and programs proposed for federal funding throughout the seven-county metropolitan area. The TIP is a federally required document that reflects funding available and reasonably anticipated (fiscally constrained). The MPO is required to prepare the TIP as a short-range programming document that complements the long-range transportation plan. The Council prepares the TIP in cooperation with MnDOT. The TIP includes federal funds allocated through the regional solicitation process, and federal formula funds programmed by the MnDOT, the Council and transit providers.

The Council used its website, email lists and social media channels to promote the public comment period and the pop-up public meetings, as well as advertising the public comment period in the Minneapolis Star Tribune (a newspaper of regional circulation). Council staff also engaged the

members of our TAB and the Council's Transportation Committee to share the public comment period and pop-up public meetings with their constituencies. During the public comment period, the Council scheduled pop-up public meetings in July to increase awareness of the TIP and to encourage feedback from transportation network users.

Unified Planning Work Program

The Unified Planning Work Program is a federally required program that details and describes proposed transportation and transportation-related planning activities in the metropolitan area. The program document is critical to the planning and policy work of the Council as it also serves as the application for transportation planning funds from the U.S. Department of Transportation. The work program is prepared annually and describes metropolitan-area transportation planning activities being undertaken by four agencies: The Metropolitan Council, MnDOT, the Minnesota Pollution Control Agency, and the Metropolitan Airports Commission.

The Council facilitates extensive feedback about the planning studies in the work program from partners, constituencies throughout the region (including the disability community), and residents and business interests who follow transportation planning.

Project-Specific Outreach Activities

In addition to the public participation activities summarized above, the Metropolitan Council and Metro Transit also tailor public outreach activities for specific transportation projects. Below are summaries of project-specific outreach efforts that have occurred since the last Title VI Program submission.

METRO Green Line Extension

Under construction and scheduled to open in 2023, the METRO Green Line Extension (Southwest LRT) will extend 14.5 miles from Target Field Station in downtown Minneapolis and serve the communities of St. Louis Park, Hopkins, Minnetonka, and Eden Prairie, and is projected to provide 29,000 rides per day in 2035. Along with this new transit line will come many opportunities for development and community growth.

Since taking the lead on the Southwest LRT project in January 2013, the Metropolitan Council has made significant efforts to engage community stakeholders, including minority, low-income, and LEP communities. The outreach efforts started with the preparation of a Communication and Public Involvement Plan that considered the corridor demographics and included a stakeholder analysis of the corridor. This information was used to develop specific outreach strategies and hire a team of three outreach coordinators.

Community Outreach Events

Southwest LRT outreach staff hosts or attends nearly 200 public meetings, community open houses, meetings or property owner meetings annually since January 2013, when the Metropolitan Council became the responsible government unit for the project. The Southwest Project Office has held open houses related to technical issues such as station layout, alignment adjustments in Eden Prairie, siting of an operational and maintenance facility and location of freight rail. In 2019, the project office hosted open houses to describe and inform the public about planned construction activities.

The project office has identified LEP populations and is intentionally engaging them. The project accommodates LEP groups by:

- Hiring project staff that speak more than one language
- Translating materials into other languages common in the corridor

- Working with community representatives to disperse information in non-written (verbal) formats
- Developing communication materials that employ plain language principles to ensure clear and understandable content to the public
- Employing outreach techniques (e.g. higher use of graphics to illustrate concepts) to engage LEP populations

To engage LEP populations, the project office has translated environmental documents and guides into Somali, Spanish and Hmong, the predominant non-English languages along the project corridor. In addition, the project carries a standing contract for verbal and written translation services that can be exercised on a demand basis.

Public Comment Line and Email Address

The Metropolitan Council established a telephone number and email address to receive general comments and questions about the Southwest LRT Project. The comment line and email account are monitored daily by project staff and all comments and questions that require a response are routed to the appropriate outreach staff member. As part of construction, a construction 24-hour hotline was established to connect with stakeholders regarding issues arising due to construction activities.

Advisory Committees

The Metropolitan Council established the Southwest LRT Community Advisory Committee (CAC) and Business Advisory Committee (BAC) in 2012. These committees, in addition to the Corridor Management Committee, advise the Metropolitan Council on issues related to engineering and design, environmental impacts, land use, and transit-oriented development.

- The CAC serves as a primary avenue for public and community involvement in the design process, and includes representatives of neighborhood and community groups, underrepresented populations, religious and educational institutions, transit users and bicycle riders, as well as other stakeholder groups. Several organizations that serve underrepresented populations and received grants through the Community Engagement Team program are represented on the CAC. In 2018, the CAC disbanded with design of the project being completed.
- The BAC represents the diversity of commercial activities along the Southwest Corridor, including corporations, small businesses, chambers of commerce, non-profit organizations, developers, and landowners.
- The SWLRT Communications Steering Committee assists project outreach staff in planning communication and outreach efforts and evaluating their effectiveness. The communications committee includes representatives from project partner agencies and municipal stakeholders.
- Disadvantaged Business Enterprise & Workforce Advisory Committee serves to collaboratively advise the Metropolitan Council that oversees construction contractors' efforts towards compliance with DBE small business and workforce participation requirements during construction. In 2020, project staff will establish construction information workgroups for each of the five corridor communities. These workgroups will provide staff feedback on construction communications and outreach activities, as well as support for sharing project information to the larger communities and stakeholders.

Publications

Starting in 2012 and throughout construction, the Metropolitan Council produces a range of print and electronic publications to provide information about the Southwest LRT Project and encourage public involvement. The project newsletter, Extending Tracks, was produced in both print and electronic (PDF

and email) formats; visitors to the project website could subscribe online. During construction, Extending Tracks was replaced with weekly updates that can be email or texted to stakeholders. Weekly updates are posted on the project's website. Communications staff produces fact sheets and brochures focusing on specific topics such as station location, LRT engineering, environmental stewardship, and construction impacts.

The project website -- www.swlrt.org -- features project descriptions, environmental documents, news, announcements of upcoming events, and information on committee meetings including presentations. The project website is used to disseminate information and receive comments from the public, is ADA accessible, and is updated on a regular basis to ensure all communities can access information in a transparent environment. As a matter of practice when hosting community events/open houses, meeting exhibits are posted on the project website. In addition, public comment forms are also posted on the project's website for specific topics to receive additional feedback from the public who are unable to attend community meetings.

Media Relations

The Southwest LRT Project Office and the Metropolitan Council's media relations staff work together to produce news releases and news advisories for distribution to media organizations in the Twin Cities region, including neighborhood newspapers and minority/ethnic news organizations. Project office media relations staff responds to queries from reporters and pitch stories about the project.

Social Media

Project staff use Twitter and the Metropolitan's Facebook page to promote public events and announce project milestones and uses GovDelivery to send out meeting notices, newsletters, and press releases. In 2019, the project has 16,000 GovDelivery subscribers and 1,400 Twitter followers.

More information about the project can be found online at www.swlrt.org.

METRO Blue Line Extension

The METRO Blue Line Extension (Bottineau LRT) will operate northwest from downtown Minneapolis through north Minneapolis, Golden Valley, Robbinsdale, Crystal and Brooklyn Park, drawing riders northwest of Brooklyn Park. The proposed alignment is primarily at-grade and will have 11 new stations in addition to Target Field Station, and about 13 miles of double track. The line will interline with the METRO Blue Line and connect Minneapolis and the region's northwestern communities with the broader transitway network and many bus routes.

Since taking the lead on the project in 2014, the Metropolitan Council has made significant efforts to engage community stakeholders, including minority, low-income, and LEP populations, at all stages of the project. Multiple community outreach coordinators are assigned to the METRO Blue Line Extension project; they are the first point of contact for members of the public, community organizations and corridor businesses, and are available to answer questions, receive input on the project, and help resolve issues.

In addition to community outreach coordinators, some of the communications strategies and techniques employed as part of the Blue Line Extension project include:

- Project website
- Fact sheets and brochures
- Newsletters
- Social media

- News releases and news advisories
- Spokespeople
- Media briefings
- Informational posters or kiosks
- Photography, video or animations

Project staff have used the following tools to involve and engage community stakeholders, including minority, low-income, and LEP populations:

- Community Advisory Committee (CAC)
- Business Advisory Committee (BAC)
- Public comment line and email address
- Public presentations
- Door-to-door canvassing
- Public meetings and forums
- Community group engagement
- Online polling and comment forums
- Radio and cable television broadcasts
- Community event participation
- Briefings and tours
- Mobile Project Office aboard a retired Metro Transit bus
- Meeting at locations proximal to target audiences and accessible via transit
- Meeting at various times of day and days of week
- ADA accessible documents and meeting locations

The project CAC includes representatives of neighborhood and community groups, underrepresented populations, religious and educational institutions, transit users and bicycle riders, as well as other stakeholder groups. The BAC members represent the diversity of commercial activities along the corridor, including corporations, small businesses, chambers of commerce, non-profit organizations, developers, and landowners.

Staff have and continue to engage LEP populations intentionally. They do so by:

- Hiring project staff that speak more than one language
- Translating materials into other languages common in the corridor
- Working with community representatives to disperse information in non-written (verbal) formats
- Developing communication materials that employ plain language principles to ensure clear and understandable content to the public
- Employing outreach techniques (e.g. higher use of graphics to illustrate concepts) to engage LEP populations

More information can be found online at www.BlueLineExt.org.

METRO Orange Line

Transit improvements on I-35W will benefit existing riders and help attract new riders with more reliable and frequent service, seven days a week. The METRO brand will increase the visibility of transit along the corridor and provide easy-to-use amenities like ticket vending machines and electronic displays with travel information. Additionally, service improvements to bus routes that connect with the METRO Orange Line will attract new riders to the entire transit system.

The all-day, frequent service of the METRO Orange Line will complement local and express bus routes along I-35W by providing competitive travel times for station-to-station trips and a new option for commuters who live in the urban core and work in the suburbs, or “reverse-commuters.” Express bus riders will also benefit from new stations and bus-only lanes on I-35W. As a part of the METRO system, the Orange Line will connect people across the region to job centers, housing options, and destinations in the corridor. This new transportation option will expand accessibility and promote and complement compact, walkable neighborhoods in the station areas.

The Orange Line project has completed major planning, design and funding milestones and is now under construction. Staff is implementing a public outreach plan to provide construction communications and outreach to stakeholders. This plan prepares stakeholders for construction and promote benefits of Orange Line service by maintaining ongoing communication with the public. These tools will be used throughout the construction phase:

- Website updated weekly with construction details
- Frequent Construction Bulletin e-newsletter
- Seasonal Construction Open House
- Social Media ahead of major construction impacts
- Site visits to neighbors near construction area

The METRO Orange Line is expected to open for service in late 2021. More information can be found online at www.metrotransit.org/metro-orange-line.

METRO Gold Line

The METRO Gold Line BRT project is a planned 10-mile BRT transit line in Ramsey and Washington counties in the eastern part of the Twin Cities metropolitan area. The proposed line will travel between downtown Saint Paul and Woodbury, serving the cities of Saint Paul, Maplewood, Landfall, Oakdale, and Woodbury. The route will run along local roadways generally north of and near Interstate 94 primarily within bus-only lanes (dedicated guideway) and serve 21 stations, including 10 in downtown Saint Paul. The stations will have enhanced features similar to existing METRO service. The line is anticipated to serve and draw ridership from a broader area in the region as well, including portions of western Wisconsin, Washington County, Ramsey County, Dakota County, and Hennepin County, including the city of Minneapolis. Gold Line BRT is planned to begin revenue service in 2024.

The Communication and Public Involvement Plan addresses the need to communicate and engage with multiple audiences within the corridor and across the region. A well-informed and engaged public strengthens the project and helps create a more useful transit system for all. The Council, Metro Transit, and project’s local funding partners Washington and Ramsey counties, understand the need to engage corridor stakeholders in the development of project details and in fostering broad support for the project as a necessary investment to improve access and mobility to employment, educational and economic opportunities within the corridor and beyond.

Gold Line project staff will seek to engage corridor residents, businesses, organizations and transit riders in the project planning process to solicit their input and address their needs and concerns. Concerted effort will also be given to communities that have been traditionally underrepresented in transit planning processes: minority, low-income, and LEP populations, people with disabilities and other historically marginalized groups. This plan identifies key business and community groups along the corridor and details strategies that will maximize opportunities for engagement and communication during the design process.

To achieve the goals of this, plan and communicate effectively with its target audiences, project staff and project partners employ multiple communication and public engagement strategies. The project's community outreach and engagement coordinator determines which strategy to implement based on the current issue or question that the project is facing. Some of the public involvement and communication methods include:

- **One-on-one** conversations to receive specific comments from property owners or other directly impacted individuals
- **Door-knocking or canvassing** to reach specific affected properties, especially when a decision that could change impacts to a specific property(ies) are being considered
- **Community presentations** giving an overview of the project or specific details for discussion to any interested party
- **Group engagement** with existing organization and businesses groups on target issues, including asking groups to host discussions
- **Public meetings** such as open houses, forums, or townhalls to provide information, answer questions, and solicit public input with interactive items or comment cards
- **Community event participation** to highlight project details at spaces where people are already gathering, this can include tabling, bringing outreach buses and other active event participation
- **Project and outreach coordinator publicly shared emails** to receive general comments or specific responses to a solicited issue
- **Online polling or comment forms** to survey stakeholders as part of an outreach event or separate initiative
- **Project website** including a description of the project, timeline, map, frequently asked questions (FAQs), video, public engagement activities, and meeting dates and agendas for advisory committees. The website is updated frequently to provide the latest information.
- **Fact sheets and brochures** including Project description, map, timeline and FAQs
- **Newsletters** delivering information about the project and decisions to target audiences
- **Social media** providing brief project updates and notice of upcoming meetings. Project partners aid in amplifying messaging. Promoted Facebook posts to reach a wider audience, as well as posts that are targeted by zip code to reach additional residents along the corridor.
- **News releases and news advisories** to metro-area print and broadcast media outlets including college and neighborhood newspapers and radio stations serving audiences within the corridor
- **Informational posters or kiosks** at community gathering spots such as city hall message boards, trail hubs and major employers
- **Radio and cable television broadcasts** of brief videos and audio announcements on city and community communication outlets
- **Videos or animations** posted on the project website and included in public presentations

These strategies are used individually and in combination to ensure that two-way communication and engagement opportunities are provided to corridor stakeholders, and the variety of methods will reach a broader group of stakeholders.

Strategies were identified to ensure that the public engagement process includes comprehensive efforts to communicate with communities traditionally underserved or underrepresented. These strategies include:

- Hosting pop-up events in areas with environmental justice and LEP populations
- Translating materials into multiple languages other than English and hiring translators
- Holding public meetings at locations that are close to the target audiences, ADA compliant and accessible by transit whenever possible

More information can be found online at www.metrotransit.org/gold-line-project.

METRO C Line

The METRO C Line is the region's second arterial BRT line, which opened for service on June 8, 2019. C Line service operates from Brooklyn Center to Downtown Minneapolis via Brooklyn Boulevard, Penn Avenue and Olson Memorial Highway. C Line service includes better amenities, faster service, and a more comfortable ride.

The C Line development has had an extensive public engagement process through all phases of the project. Most recently, engagement prior to construction focused on stakeholder preparation for construction impacts. Outreach included a mailing to all residents within a quarter-mile of the C Line corridor, two community open houses, and information at various community events.

During construction, stakeholders received regular communication of activities, impacts and detours via a weekly construction bulletin, monthly construction meetings, drop-in hours at locations along the corridor, door-knocking on the corridor and a project hotline. More than 100 comments were submitted to and fielded by staff from these activities.

Hennepin County and Metro Transit also partnered on significant business outreach including providing technical support during construction, as well as signage and business highlights in the C Line construction bulletin.

In preparation for opening day, staff hosted or attended several educational and promotional events including the following:

- Meet the C Line workshop in partnership with Cleveland and Folwell neighborhoods
- Blossoms of Hope Relighting Ceremony at the Penn & Broadway station
- Jordan Week of Kindness
- Folwell Annual Meeting
- Northside Housing Fair

More information can be found online at www.metrotransit.org/c-line-project.

METRO D Line

The METRO D Line is the region's third planned arterial BRT line, currently in the project design phase. The D Line will substantially replace Route 5, running primarily on Chicago and Emerson/Fremont avenues between Brooklyn Center, Minneapolis, Richfield, and Bloomington. The D Line is planned to open in 2022, pending full project funding. Like on the A Line and C Line, BRT is planned to bring better amenities, faster service, and a more comfortable ride to this corridor.

The D Line development has had an extensive public engagement process. Since 2017 staff have:

- Attended more than 85 community events and neighborhood meetings
- Attended six Metropolitan Council meetings
- Hosted 10 open houses to assist with station planning or design
- Developed online, interactive engagement materials to broaden participation
- Participated in bus ride-alongs, bus stop pop-ups, door-knocking, surveying, and distributing flyers to broaden awareness and participation in project development
- Advertised project engagement opportunities in community newsletters, print media, Council publications, and on social media

Videos, meeting minutes, materials, contact information, a project library, frequently asked questions, and the Public Engagement Plan are all provided on the project website.

More information can be found online at www.metrotransit.org/d-line-project.

METRO B Line

The METRO B Line is the region's fourth planned arterial BRT line, currently in the project planning phase. The B Line will substantially replace Route 21, running primarily on Lake Street and Marshall Avenue between Saint Paul and south Minneapolis. The B Line is planned to open in 2023, pending full project funding. Like on the A Line and C Line, BRT is planned to bring better amenities, faster service, and a more comfortable ride to this corridor.

The B Line development has had an extensive public engagement process through planning. Since April 2019, staff have:

- Attended more than 25 community events and neighborhood meetings
- Attended one Metropolitan Council meeting
- Hosted four open houses to assist with corridor planning
- Worked to create an online open house to broaden participation
- Participated in bus ride-alongs, bus stop pop-ups, door-knocking, surveying, and distributing flyers to broaden awareness and participation in project development
- Advertised project engagement opportunities in community newsletters, print media, Council publications, and on social media

Videos, meeting minutes, materials, contact information, a project library, frequently asked questions, and the Public Engagement Plan are all provided on the project website.

More information can be found online at www.metrotransit.org/b-line-project.

METRO E Line

The METRO E Line is the region's fifth planned arterial BRT line, currently in the project study phase. The E Line will substantially replace Route 6, running primarily in the Hennepin Avenue corridor. The E Line is planned to open in 2024, pending full project funding. Like on the A Line and C Line, BRT is planned to bring better amenities, faster service, and a more comfortable ride to this corridor.

The E Line Corridor Study is evaluating routing and endpoint options outside of the core Hennepin Avenue segment (downtown Minneapolis and part of uptown). This corridor study has engaged community in several different ways:

- A corridor study advisory committee, composed of community members from across the corridor, has met twice to advise project staff as they refine alignment options and local bus service concepts
- Two sets of open houses have been held across the corridor to kick off the study and ask the public to weigh in on routing alternatives and evaluation criteria
- A third committee meeting and round of open houses will be held to seek input on the final study report
- Project staff have reached out to transit customers at key bus stops and on bus ride-alongs to share project information and seek feedback
- Staff have attended multiple community events and offered update presentations to community organizations

Extensive outreach will continue through the planning, design and construction phases of this project.

More information can be found online at www.metrotransit.org/e-line-project.

Better Bus Stops

In late 2014, Metro Transit received a \$3.26 million Ladders of Opportunity Grant from FTA to invest in bus stop and shelter improvements that enhance access to employment and educational opportunities, and to fund a robust community engagement process. These grant funds, along with available state and local money, launched the Better Bus Stops Program. The program set out to add 150 shelters at high ridership bus stops, and to add heat, light, or both at 75 existing shelters in neighborhoods where most residents are people of color and households are experiencing lower incomes. These goals are due to be achieved in 2020.

To fulfill Metro Transit's commitment to use community feedback in making bus stop investment decisions, Better Bus Stops began with a year-long community engagement process, from March 2016 through March 2017. The goals of the process were to engage with traditionally underrepresented communities, to increase transparency about bus stop and shelter investments, and engage community to learn about bus stop improvement priorities.

Metro Transit joined in a partnership with the Community Engagement Team (CET), comprised of two nonprofit organizations, Nexus Community Partners and the Alliance for Metropolitan Stability, and the Center for Urban and Regional Affairs at the University of Minnesota. The CET awarded \$229,000 in contracts to 11 local organizations to engage transit riders and historically underrepresented communities (including people of color, low-income communities, immigrants, and people with disabilities) around transit equity issues with a focus on bus stops. Metro Transit staff, CET, and subcontracted organizations formed a cohort to build relationships, share information, and interpret the feedback received across 22 neighborhoods. In addition to the focused efforts with the CET, Metro Transit staff conducted community outreach and engagement to hear from the broader transit service area on the essential questions.

Better Bus Stops community engagement was successful in reaching its goals:

- Leaders from traditionally underrepresented communities participated as subcontractors to engage people from their communities. They were instrumental in getting survey participation that demographically represents that of transit riders' as a whole in terms of race and ethnicity, income, age, ability and gender.
- In total from all Better Bus Stops community engagement strategies - an estimated 7,000 people participated and approximately 185 community engagement events were held.
- Increased transparency about bus stop and shelter investments was achieved through Metro Transit staff preparing and sharing technical information in collaboration with subcontractors, and then making it available to the general public.
- Metro Transit used the community-identified priorities to update its shelter placement guidelines in 2018. Along with the busiest bus stops, the new guidelines say shelters should be considered at other key locations, including near hospitals and in areas where people are unlikely to own a vehicle.

More information can be found online at www.metrotransit.org/better-bus-stops and www.metrotransit.org/community-engagement.

Downtown Saint Paul Transit Customer Facility Improvements

In the first half of 2019, Metro Transit conducted a design process to identify preferred designs for enhanced shelters at three high-ridership bus stops in downtown Saint Paul. These bus stops are served by multiple express and local routes, with hundreds of passengers boarded per day. The concept designs will be the basis for further design and ultimately construction. The improvements will consist of shelter, heater, lighting, seating and transit information, and improving the pedestrian access to and around the bus stops. These features are proven to reduce transit customers' perception of wait time at bus stops.

In addition to collaboration with city staff, Metro Transit sought input in its design process from local downtown community organizations, transit customers at the subject bus stops, and neighboring property stakeholders. Community members were invited to two design workshops:

- The first workshop's purpose was to identify needs and opportunities for each bus stop.
- At the second workshop, community members were invited to respond to alternative design concepts for each bus stop and provide feedback for use in the final, preferred concept design.

Metro Transit staff brought the alternative design concepts to the bus stops to gather feedback from transit customers, provided an electronic survey, went to community group meetings to participate on their agendas, presented to the Metropolitan Council's Transportation Accessibility Advisory Committee, and had individual meetings with property stakeholders.

Community input influenced the aesthetic of the shelters and the placement of the shelters along the street. Community feedback was used to help Metro Transit make decisions to balance the desire for shelters with good weather protection with the need to avoid an enclosure that may result in personal safety concerns. The preferred concept designs were selected, and another design iteration completed using the community input received. The final concept designs were shared with participating community organizations and posted online.

More information can be found online at www.metrotransit.org/downtown-st-paul-transit-improvements.

West End and Route 9 Transit Study

The purpose of the West End and Route 9 Transit Study was to review service in the study area and recommend service changes to meet growing employment and residential needs, changing travel patterns and new demographics. On Aug. 19, 2017, major changes were implemented on Routes 9, 25, 604, 649 and 675 in Minneapolis, Golden Valley, St. Louis Park and Minnetonka, centered around the West End near I-394 & Hwy. 100.

Prior to drafting the service change concept plan, staff reviewed the feedback and service requests gathered by Metro Transit Customer Relations. In addition, a survey of Route 9 customers riding west of Louisiana Avenue on Route 9N was completed in March 2016. Staff boarded all weekday, Saturday and Sunday trips to learn more about the travel patterns in this area. Additional notifications of public hearings were provided in the Star Tribune and Connect, Metro Transit's onboard customer newsletter. The project website also included the study results and various documents related to the project. Additionally, notices and on-board announcements were made, community-based organizations were contacted, and a social media campaign with a YouTube presentation was created. Two public meetings were conducted with over 40 participants. There were 137 comments from 113 individuals received.

Since the last Title VI Program submission, a final round of outreach was done in March 2017 to give stakeholders the opportunity to review the revisions to the Concept Plan and see the details of the Recommended Plan that staff was bringing to the Council for approval in April. There was a public meeting held on March 21, 2017 in St. Louis Park with approximately 25 attendees. In addition to the meeting, Metro Transit, as in the Concept Plan phase, used different outreach strategies to ensure information about the plan and the service changes were available to stakeholders. Strategies included boarding buses to make announcements, emailing stakeholders, and reaching out to affected cities.

In addition to those methods listed above, the public could provide feedback via a dedicated e-mail account operated by Service Development staff, calls to Customer Relations, letters, faxes, petitions, Twitter, Facebook, comment cards, and the Council's public comment line. The most popular methods for the public to comment were e-mail (52% of comments), speaking at public hearings (22% of comments), and comment cards distributed at the public hearings (15% of comments). A small number of comments were received through Customer Relations, on Facebook, by voicemail, and by letter. In total, Metro Transit received 197 comments from 158 individuals. Feedback from stakeholders and public comments identified areas of concern in the original Concept Plan, and highlighted areas which warranted modification.

The recommended plan, informed by public input, was approved by the Metropolitan Council on April 26, 2017. The service changes took effect on August 19, 2017 and were preceded by several outreach steps.

More information can be found online at www.metrotransit.org/west-end.

Ongoing Outreach and Presence in Communities

Metro Transit engages in extensive public participation during its day-to-day operations. Metro Transit uses a variety of communication tools depending on the situation, including rider alerts distributed on buses, postings at bus stops, and a subscription-based service alert feature. For proposed adjustments that eliminate service on a route segment or significantly reduce service span or frequency, Metro Transit notifies impacted customers and other stakeholders and provides opportunities for input before any decisions are finalized. For larger capital projects, community input is key in ensuring new projects match the needs and desire of community and often require a more robust effort to gather consensus.

Knowing that official channels of communication often leave out the most vulnerable members of the community, in 2018, Metro Transit hired and consolidated all of its community outreach and engagement positions into one, new team. The community outreach coordinators and their supervisor were tasked with supporting two goals: provide agency outreach support to large capital projects (mainly BRT, arterial BRT, major service planning, and facilities projects) and develop long-lasting relationships with transit riders, people of color, low-income communities, and people with disabilities to grow their capacity to participate in decision-making at their fullest potential through deploying creative, thoughtful, and equitable outreach and communications campaigns.

These goals have been supported through:

- Regular attendance at large community events spread across geographic areas such as MayDay, Open Streets, and Rondo Days, as well as smaller neighborhood events like Community Peace Celebrations and National Night Out events
- Informing riders on buses or at bus stops through informational items or surveys
- Hosting events in prominent community locations or on transit property
- Making materials more accessible through translation or through community connectors

- Providing information in multiple unique forms of communication including digital, in person, print media, social media, direct mail, and radio
- Developing partnerships with community groups and leaders to broaden engagement reach and build trust
- Building relationships with individual residents, businesses, and property owners to obtain input on capital projects and foster two-way communication
- Forming advisory committees of community and business members to participate in capital project decision-making

Metro Transit acknowledges the changing demographics of its service area and knows that outreach staff must remain nimble and committed to shifting geographic focus to respond to the changes within the communities served. Additionally, within the area of outreach and being a visible and respected partner with the community, the outreach team has an extended employee network working with a specific cultural focus (i.e., Native American and Indigenous people) or a specific outcome focus (i.e., employee recruitment, transit project delivery). Together with our community partners, Metro Transit strives to strengthen community connections and best match services with community needs.

Highlighting Best Practices

- Bringing Metro Transit project information to community gatherings to not solely depend on people attending Metro Transit-hosted meetings for face-to-face engagement
- Compensating community members for their expertise and participation
- Pop-up community engagement at transit stops and on ride-alongs
- Community-building events hosted by Metro Transit Police Department to build relationships with youth
- Bringing the opportunity to sign up for Transit Assistance Program to community events

Language Assistance Plan

The Metropolitan Council has prepared a formal Language Assistance Plan (Attachment E) for providing language assistance to persons with limited English proficiency (LEP), based on DOT LEP Guidance. The Council's Language Assistance Plan demonstrates the Council's commitment to provide meaningful access to all individuals accessing the Council's services, including Metro Transit, Metro Mobility, and Transit Link. The DOT LEP Guidance notes that effective implementation plans include the following five elements:

- Identifying LEP individuals who need language assistance
- Providing language assistance measures
- Training staff
- Providing notice to LEP persons
- Monitoring and updating the plan

Below is a summary of these five elements, found in the Council's Language Assistance Plan.

Identifying LEP Individuals

A four-factor analysis was completed to identify LEP individuals who need language assistance. Based on U.S. Census Bureau 2013-2017 American Community Survey (ACS) five-year estimates, the Metro Transit service area is home to 2,118,088 people, 7.2 percent (153,549) of whom are LEP individuals. Spanish is the most frequent language spoken in the Metro Transit service area other than English, comprising 2.4 percent (50,622) of the total service area population.

Table 1 lists LEP populations within Metro Transit’s service area according to the twelve foreign language classifications contained in the 2013-2017 ACS at the tract level. No languages have LEP populations that exceed 5% of the total population in the service area. Eleven of the 12 language classifications have LEP populations over 1,000.

Table 1: Limited English Proficiency Speakers in the Metro Transit Service Area

Language	Number of LEP Speakers	Pct. of Total LEP	Pct. of Total Population
Spanish	50,622	33.0%	2.4%
Other Asian and Pacific Island languages	39,657	25.8%	1.9%
Other or unspecified languages	28,782	18.7%	1.4%
Vietnamese	8,785	5.7%	0.4%
Chinese (incl. Mandarin, Cantonese)	6,449	4.2%	0.3%
Russian, Polish, and other Slavic languages	5,829	3.8%	0.3%
Other Indo-European languages	4,708	3.1%	0.2%
Arabic	2,772	1.8%	0.1%
French, Haitian, and Cajun	2,667	1.7%	0.1%
Korean	1,293	0.8%	0.1%
Tagalog (incl. Filipino)	1,023	0.7%	0.0%
German and other West Germanic languages	962	0.6%	0.0%

Further analysis indicates that:

- LEP Spanish speakers are more widely dispersed than other language groups, being located in both urban & suburban communities;
- LEP speakers of “Other Asian and Pacific Island languages” (i.e., Hmong and Karen) reside in north Minneapolis, in St Paul along University Avenue and the East Side, and also in suburbs in the north and northwest metro.
- LEP Vietnamese speakers are located in the north and northwest areas of the metro, and are also located along University Avenue in St Paul
- LEP speakers of “other or unspecified languages” are scattered across the service area but are mainly located in the central area Minneapolis and along University Avenue in St Paul. Somali is the most prevalent language within this classification.

Data collected by the Metropolitan Council are used to supplement Census data in order to more precisely gauge the needs of LEP individuals. Metro Transit Call Center data and Bus Operator surveys, along with Census data, support the conclusion that Metro Transit interacts most commonly with LEP individuals who speak **Spanish, Hmong, Somali, Vietnamese and Karen**.

Language Assistance Measures

Metro Transit, Metro Mobility, and First Transit, use several strategies to provide language assistance to LEP customers, including:

- **Ticket vending machines (TVMs)** that offer Spanish, Hmong, or Somali translations for purchasing fares

- **Language Line Call Center** phone services, offering interpretation services in 170 different languages;
- **Interactive Voice Response (IVR) system** offers automated messages in Spanish to LEP customers calling Metro Transit's general phone line;
- **Translations**, available upon request, of all public documents and meeting materials presented at community/outreach meetings;
- **Interpreters**, available upon request, for community/outreach meetings;
- **Outreach and educational workshops** by Metro Transit Customer Advocates offering personalized and linguistically accessible how-to-ride classes to groups throughout Metro Transit's service area;
- **Translated materials** providing information on a variety of resources, fare products, user guides, etc.
- **Website** with content that has been translated into Spanish, Hmong, Somali, Vietnamese and Karen;
- **Radio and television advertising** to communities that speak languages other than English.

Future Strategies to Better Serve LEP Customers

The Council, Metro Transit, Metro Mobility, and Transit Link will explore the following strategies to continue providing meaningful access to LEP commuters:

- Adding Karen and Vietnamese translations for ticket purchases at all TVMs
- Continuing survey work to assess how LEP customers interact with the Council
- Continuing to coordinate Title VI working groups composed of Council staff to facilitate Title VI implementation, including LEP efforts
- Revising language services as appropriate
- Collaborating with community groups serving LEP populations to understand the linguistic needs of these communities
- Creating meaningful outreach by using multi-lingual employees as ambassadors to community organizations that represent LEP communities
- Continuing outreach with Customer Advocates

Staff Training

The Metropolitan Council provides basic training for employees at its Metro Transit and Metro Mobility call centers for utilizing the services of Language Line to help facilitate meaningful interactions with LEP customers. In addition, Metro Transit and OEO developed languages classes for various public-facing personnel. These include Transit-related Spanish language classes for bus operators that drive through Spanish speaking areas of the region. Furthermore, Metro Transit Police offered Spanish classes to police officers to help them interact with Spanish speaking customers. These courses will have expanded to include Somali instruction for police officers, and Spanish courses for operators in additional locations. Additional LEP training is given to employees on a case-by-case basis based on employee, supervisor, and customer feedback.

Monitoring & Updating the Language Assistance Plan

The Council is committed to continuously improving its Language Assistance Plan. To that end, the company will revise the plan with more appropriate strategies. These may include future bus operator trainings and resources. Additionally, the Council, Metro Transit, Metro Mobility, and Transit Link will assess the viability and cost-effectiveness of pursuing and implementing new technologies and language assistance strategies as they become available.

Minority Representation on Planning and Advisory Bodies

The Title VI Circular states the following regarding the membership of planning and advisory bodies:

Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees or councils.

Metropolitan Council members serve on standing committees that meet regularly and make recommendations to the full Metropolitan Council. The public is encouraged to attend the Metropolitan Council and committee meetings and hearings and express their points of view on matters before the Metropolitan Council.

The processes used for appointing members to the Metropolitan Council and other planning and advisory committees vary between committees. Members of the Metropolitan Council and some committees are appointed by the Governor’s Office using a process administered by the Secretary of State. Other committees consist of a combination of members appointed by the Council and locally elected officials or rely on mechanisms or formulas specific to that committee. The demographic profile of each committee is summarized in Table 2. The demographic breakdown of the seven-county metropolitan area is also shown for comparison.

Table 2: Committee and Advisory Board Demographics

Committee (Number of Members)	White/ Caucasian	Hispanic or Latino	Black/African American	Asian/Asian American	American Indian	Native Hawaiian or Other Pacific Islander	Other/Two or More Races	No Response
Seven-County Metropolitan Area*	73.7%	6.2%	9.0%	7.3%	0.5%	0.0%	3.3%	-
Metropolitan Council (17)	58.8%	0.0%	17.6%	5.9%	5.9%	0.0%	11.8%	0.0%
Land Use Advisory Committee (17)	70.6%	0.0%	5.9%	0.0%	0.0%	0.0%	11.8%	11.8%
Equity Advisory Committee (20)	15.0%	5.0%	40.0%	15.0%	5.0%	0.0%	15.0%	5.0%
Livable Communities Advisory Committee (15)	60.0%	0.0%	20.0%	0.0%	0.0%	0.0%	6.7%	13.3%
Metro Parks & Open Space Commission (9)	66.7%	0.0%	22.2%	0.0%	0.0%	0.0%	11.1%	0.0%
Metropolitan Area Water Supply Advisory Committee (16)	62.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	37.5%
Transportation Advisory Board (33)	75.7%	0.0%	3.0%	0.0%	0.0%	0.0%	0.0%	21.3%

Transportation Advisory Board Technical Advisory Committee (20)	20%	0.0%	5.0%	0.0%	0.0%	0.0%	0.0%	75.0%
Transportation Accessibility Advisory Committee (9)	77.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	22.2%

* U.S. Census Bureau 2013-2017 American Community Survey Five-Year Estimates.

Encouraging Minority Participation

The Council has taken many steps to promote and encourage participation from minority populations on these committees. This has included several in-person meetings, both larger-scale (with community partner organizations) and smaller one-on-one meetings with community organizations that work with equity issues and have significant relationships with providing service to or cultivating leadership among people of color, people with disabilities, youth, and our community's elders.

In addition to in-person meetings, the Council has promoted openings for committees widely, including the following:

- The Council's website and extensive email network, which includes nearly 60,000 recipients
- Social media accounts, aimed at both general and targeted audiences
- Promotion to traditional and niche media (ethnic media, Access Press, Minnesota Women's press).
- Online display ads in several outlets during the application periods
- Worked with partner agencies to communicate information about the openings through their channels (community-based organizations, local governments, etc.)

Subrecipient Monitoring

The Title VI Circular provides the following guidance regarding subrecipient monitoring:

Subrecipients shall submit Title VI Programs to the primary recipient from whom they receive funding in order to assist the primary recipient in its compliance efforts. Such programs may be submitted and stored electronically at the option of the primary recipient. Subrecipients may choose to adopt the primary recipient's notice to beneficiaries, complaint procedures and complaint form, public participation plan, and language assistance plan where appropriate.

The Metropolitan Council functions as both the MPO and the primary transit operator for the Twin Cities Metropolitan Area. As the MPO, the Metropolitan Council is the recipient of FTA funds that are sometimes passed through to other governmental units (subrecipients) who provide transit services. These subrecipients include:

- Minnesota Valley Transit Authority (MVTA)
- Maple Grove Transit
- SouthWest Transit
- Plymouth Metrolink

Each subrecipient is required to submit a Title VI Program to the Metropolitan Council every three years demonstrating the actions they are taking to fulfill their Title VI requirements. Title VI Program due dates are determined with each subrecipient individually. As of the date of this program, all subrecipient

Title VI Programs have been received and found to be in compliance with the Title VI Circular. Title VI Program compliance reviews are conducted by the Title VI Liaison and the Program and Evaluation Director.

The Title VI Liaison is the Council's expert on the Title VI Program Plan and Guidelines and plays a participatory lead role in the development and implementation of FTA Title VI Compliance Program region wide. This role is currently being fulfilled by Guthrie Byard, ADA & Title VI Administrator.

Programs scheduled for review will be notified in writing at least 60 days in advance to coordinate a date to ensure the attendance of the Division Chief and key personnel. The notice of review (NOR) will include a compliance review instrument containing questions that the programs are required to answer in writing and return 30 days prior to the scheduled on-site review.

The Title VI Program Liaison staff and Program and Evaluation staff will review the program response during the desk review process in advance of the on-site review. The on-site review will be conducted over a five-day period and consist of an entrance conference, review of files and documentation, interviews, and an exit conference.

A Determination of Findings (DOF) will be issued within a 30-day period following the exit conference. A copy of the findings is provided to the Department Director, the Division General Manager, OEO Director, FTA Region 5 office and to the appropriate executive staff of the program being reviewed. No action on the part of the program is required on findings of compliance, unless a condition of compliance is specified. However, programs found out of compliance are required to develop a Corrective Action Plan (CAP) to overcome any deficiencies noted in the DOF within a period not to exceed 90 days. If it is determined that the matter cannot be resolved voluntarily, by informal means, action will be taken to effectuate compliance. See the Corrective Action section that follows.

The Council's Title VI Liaison will attend the FTA Triennial review of the Council. The Liaison will assist Council staff in addressing any corrective actions or recommendations when appropriate. Effective compliance of Title VI requires the Council to take prompt action to achieve voluntary compliance in all instances in which noncompliance is found.

If a Council program or subrecipient is found out of compliance or is believed to be out of compliance with Title VI, the Council has three potential remedies:

- Resolution of the noncompliance status or potential noncompliance status by voluntary means by entering into an agreement which becomes a condition of assistance;
- Where voluntary compliance efforts are unsuccessful, a refusal to grant or continue the assistance is initiated; or
- Where voluntary compliance efforts are unsuccessful, referral of the violation to FTA who will forward to the U.S. Department of Justice for judicial consideration.

Facility Siting

The Title VI Circular states the following regarding the siting of facilities:

In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin...

...Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc.

Since the previous Title VI Program submission, Metro Transit has completed the relocation of its Police Headquarters to the existing Heywood Campus, part of the larger Heywood Campus Expansion project. Additionally, the Metropolitan Council is currently in the construction stage of the METRO Green Line Extension project, which includes a rail support facility in Hopkins. A summary of the efforts completed or currently underway to ensure these facilities are being sited in compliance with the requirements of the Title VI Circular is provided below.

Heywood Campus Expansion

Metro Transit is currently pursuing the implementation of a new bus garage facility to provide the bus operations and maintenance capacity necessary for service expansion and increased service levels anticipated over the next several years. Construction is planned to begin in 2020. Concurrent with this effort, Metro Transit completed in 2019 a relocation of its Transit Police headquarters in order to reduce response times and better serve high demand locations. Through the site selection process, Metro Transit has determined that the area surrounding the existing Heywood bus garage and office facility in the North Loop area of downtown Minneapolis is the most appropriate location for both the additional garage and the relocated police headquarters. The new bus garage is referred to as Heywood II in this report.

The facility equity analysis for the Heywood Campus Expansion project was completed in early 2016. A geographic information systems (GIS)-based approach was employed to measure and compare the distribution of potential impacts to minority and non-minority populations from bus garage and Metro Transit Police Headquarter sites. The top three sites for both the Police Headquarters and bus garage were analyzed. Additional analysis was completed to evaluate any cumulative impacts of the Heywood I facility with the Heywood II site.

The facility siting equity analysis found the construction of the additional bus garage and relocation of the police headquarters to the expanded Heywood Campus met the Title VI requirements outlined in the FTA Circular. Of the three sites evaluated for the police headquarters, the Heywood site was the only location that would not have the potential for disparate impacts to minority populations or disproportionate burdens to low-income populations. The evaluation also found that the location of the additional bus garage at the Heywood Campus would not result in disparate impacts to minority populations but did show the potential for disproportionate burdens to low-income populations. As part of the 2016 analysis, an additional qualitative assessment of low-income populations near the potential Heywood II facility was completed because of the rapidly changing nature of the neighborhood adjacent to the Heywood Campus. Further analysis of recent and proposed residential developments suggested that the rapidly changing demographics in the area around the Heywood Campus were not represented in the available Census data, and the share of low-income population is likely significantly lower than estimated from the Census data. At that point in 2016, there were six luxury apartments with 703 total units that had been recently constructed or were under construction. Very few—if any—existing low-income populations were being displaced by these new developments. Rather, these developments will result in additional population within the area.

Updated Census Data

In the 2016 facility equity analysis, Metro Transit committed to continuing to monitor the potential impacts to low-income populations as more timely data became available. The original analysis was completed based on 2010-2014 ACS five-year estimates; the results for the combined Heywood site are shown in Table 3.

Table 3: Site Equity Analysis, Heywood as One Site, 2010-2014 Data

Population Group	Comparison Population		Population of Site Impact Area		Share of the Comparison Population	Comparison Index
Total	558,549	100%	1,453	100%	0.260%	
Minority	240,130	43%	654	45.0%	0.272%	1.09
Non-Minority	318,419	57%	799	55.0%	0.251%	
Low-Income	119,512	22%	592	50.3%	0.495%	3.60
Non-Low-Income	424,894	78%	585	49.7%	0.138%	

The same analysis was replicated in late 2019 using 2013-2017 ACS five-year estimates, the most currently available data at the time (Table 4).

As was predicted in 2016, the non-low-income population within the site impact area nearly doubled over the three-year period, from 585 to 1,011 (Table 3, Table 4). Meanwhile, the low-income population decreased slightly, from 592 to 577. However, despite the demographic changes observed over the three-year period between the 2010-2014 and 2013-2017 ACS datasets, the comparison index (2.31) remains above the four-fifth threshold of 1.25, signifying potential to negatively impact low-income populations (Table 4).

Table 4: Site Equity Analysis, Heywood as One Site, 2013-2017 Data

Population Group	Comparison Population		Population of Site Impact Area		Share of the Comparison Population	Comparison Index
Total	577,446	100%	2,012	100%	0.348%	
Minority	259,866	45%	796	40%	0.306%	0.80
Non-Minority	317,580	55%	1,216	60%	0.383%	
Low-Income	111,449	20%	577	36%	0.517%	2.31
Non-Low-Income	451,600	80%	1,011	64%	0.224%	

Again, it is believed that the qualitative assessment of low-income populations near the Heywood II site impact area shows a different story about the rapidly-changing North Loop area than do Census data. Construction of luxury apartments has continued since 2016, and it is believed that Census data – despite becoming more reflective of changes – still do not accurately reflect the demographics of the area. Metro Transit will continue to monitor the potential impacts to low-income populations as more timely data become available.

METRO Green Line Extension Operations and Maintenance Facility

The METRO Green Line Extension (Southwest LRT or SWLRT) will extend 14.5 miles from downtown Minneapolis and serve the communities of St. Louis Park, Hopkins, Minnetonka, and Eden Prairie. The LRT line is expected to be in service in late 2023.

As part of its ongoing commitment to fulfill the requirements of Title VI by operating its programs without regard to race, color, or national origin, the Southwest Project Office (SPO), part of Metro Transit, completed a facility equity analysis for the siting of the operations and maintenance (O&M) facility. The evaluation was completed to assess the potential for disparate impacts to minority populations at two

potential O&M facility sites. The two sites were screened from an initial pool of nearly 30 potential sites based on a variety of criteria including cost, neighborhood compatibility, and environmental impact. A public outreach component was included as part of the evaluation. Public meetings were held in spring of 2015 to present the results of the facility siting evaluation and to gather public feedback regarding the potential sites.

On July 15, 2016, FTA issued its determination through the Record of Decision (ROD) that the requirements of the National Environmental Policy Act of 1969 (NEPA) were satisfied for the Southwest LRT Project. The ROD signed by FTA includes the agency's decision regarding compliance with relevant environmental requirements.

Since publication of the Southwest LRT Final Environmental Impact Statement/Record of Decision (2016) and Supplemental Environmental Assessment/Amended ROD (2018), additional Project modifications were identified. On May 30, 2018, the Metropolitan Council adopted design adjustments to decrease costs including reductions to the Project's scope and budget by reallocating operations and maintenance functions and removing the Hopkins O&M Facility from the Project.

In 2018, an environmental reevaluation was conducted to assess removing the planned Hopkins O&M Facility from the project scope. In place of the Hopkins O&M Facility will be a rail support facility standalone building with employee parking, a pocket LRT track, a stormwater pond, and park-and-ride spaces on the original site. In addition, the reevaluation reviewed the modifications to the existing Franklin O&M Facility to handle SWLRT operations and maintenance facility needs. The modifications at the Franklin O&M Facility are within existing property right-of-way and include adding overhaul capacity, expanding the wash and sanding bay, and a rail control center (RCC) addition.

On September 6, 2018, the reevaluation was approved by FTA and concluded "there have been no significant changes to the proposed action, the affected environment or the anticipated impacts since the FEIS was approved in 2016 and Supplemental Environmental Assessment in 2018". The changes in impacts and/or mitigation described in the reevaluation were found to be minor and the July 2016 ROD and the May 2018 Amended ROD remain valid.

PART 2: FIXED ROUTE TRANSIT PROVIDER REQUIREMENTS

Recipients of Federal funding that provide fixed route public transportation are required to fulfill additional Title VI requirements. All such recipients are required to set system-wide service standards and policies. Transit providers such as Metro Transit that operate in an urbanized area of 200,000 or more in population and that operate 50 or more vehicles in peak service are required to fulfill additional requirements such as collecting and reporting demographic data and conducting service and fare equity analyses.

Demographic Analysis

Metro Transit uses demographic data to assess equity in the distribution of services, facilities, and amenities in relation to minority and low-income populations in its service area.¹ This data informs Metro Transit in the early stages of service, facilities, and program planning and enables Metro Transit to monitor ongoing service performance, analyze the impacts of policies and programs on these populations, and take appropriate measures to avoid or mitigate potential disparities. Metro Transit regularly develops charts and GIS maps overlaying demographic data with services, facilities, and amenities to perform these analyses.

The following set of maps show minority and low-income populations within Metro Transit's service area relative to its existing facilities and services, as well as facilities which are recently completed, in progress, or planned.

Shown in Figure 1, the Metro Transit service area includes parts of Anoka, Dakota, Hennepin, Ramsey, and Washington Counties. Metro Transit's service area has a total population of 2,118,808 based on 2013-2017 ACS five-year estimates.² Areas with greater than average minority and low-income populations (30.5 percent and 11.8 percent, respectively) have a higher level of transit service (Figure 2, Figure 3). METRO LRT and BRT routes serve minority and low-income concentrations, as do other routes in Metro Transit's high-frequency network.

Table 5 summarizes the Metro Transit service area population and its proximity to service, including population within ½ mile of transitway stations and ¼ mile of bus service. A greater percentage of

¹ FTA Circular 4702.1B defines a low-income person as one whose household income is at or below the poverty guidelines set by the Department of Health and Human Services (HHS). HHS poverty guidelines are based on household size and the number of related children less than 18 years of age. However, FTA allows for low-income populations to be defined using other established thresholds that are at least as inclusive as those developed by HHS. Correspondingly, in its Title VI Program and analyses, Metro Transit and the Metropolitan Council use U.S. Census Bureau poverty thresholds, a more sophisticated measure of poverty that considers not only family size and the number of related children present, but also, for one- and two-person family units, whether elderly or not.

² Metro Transit service area demographics are based on U.S. Census Bureau 2013-2017 American Community Survey five-year estimates at the census tract level; tracts whose centroid was within the service area were used for population calculations.

minority and low-income populations live proximal to bus and transitway service than non-minority and non-low-income populations in Metro Transit's service area.

Figure 1: Metro Transit Service

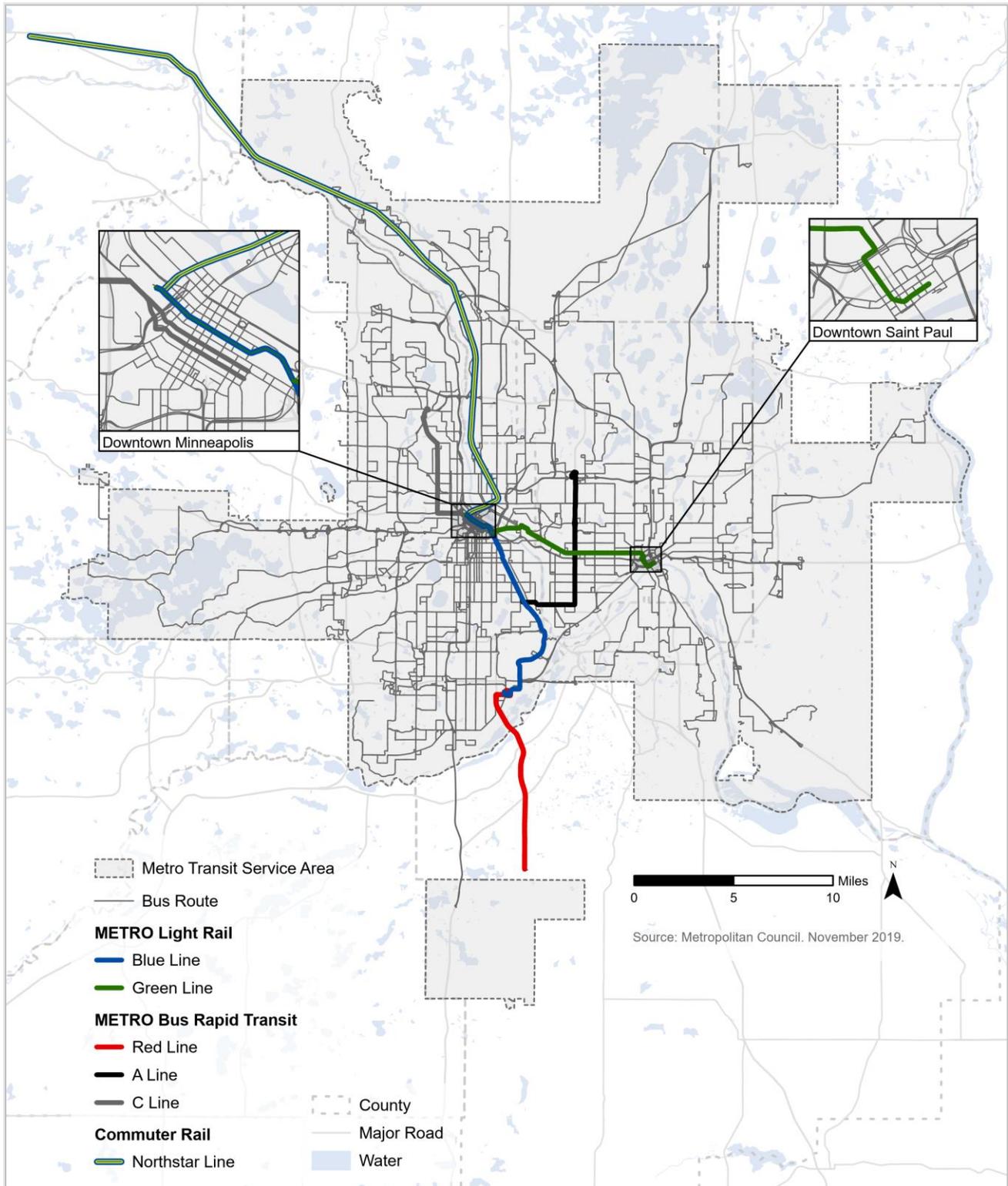


Figure 2: Metro Transit Service and Percent Minority Population

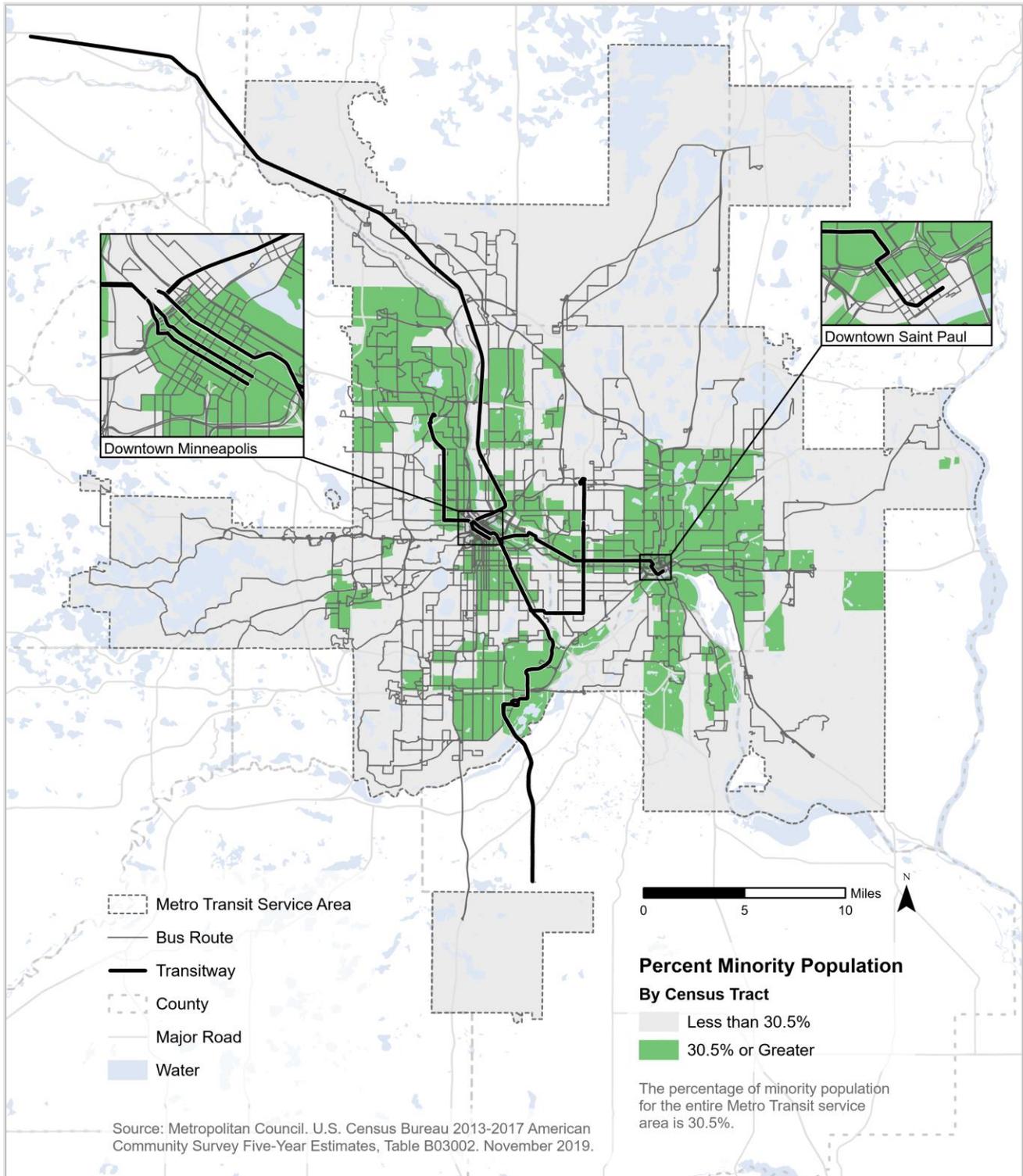


Figure 3: Metro Transit Service and Percent Low-Income Population

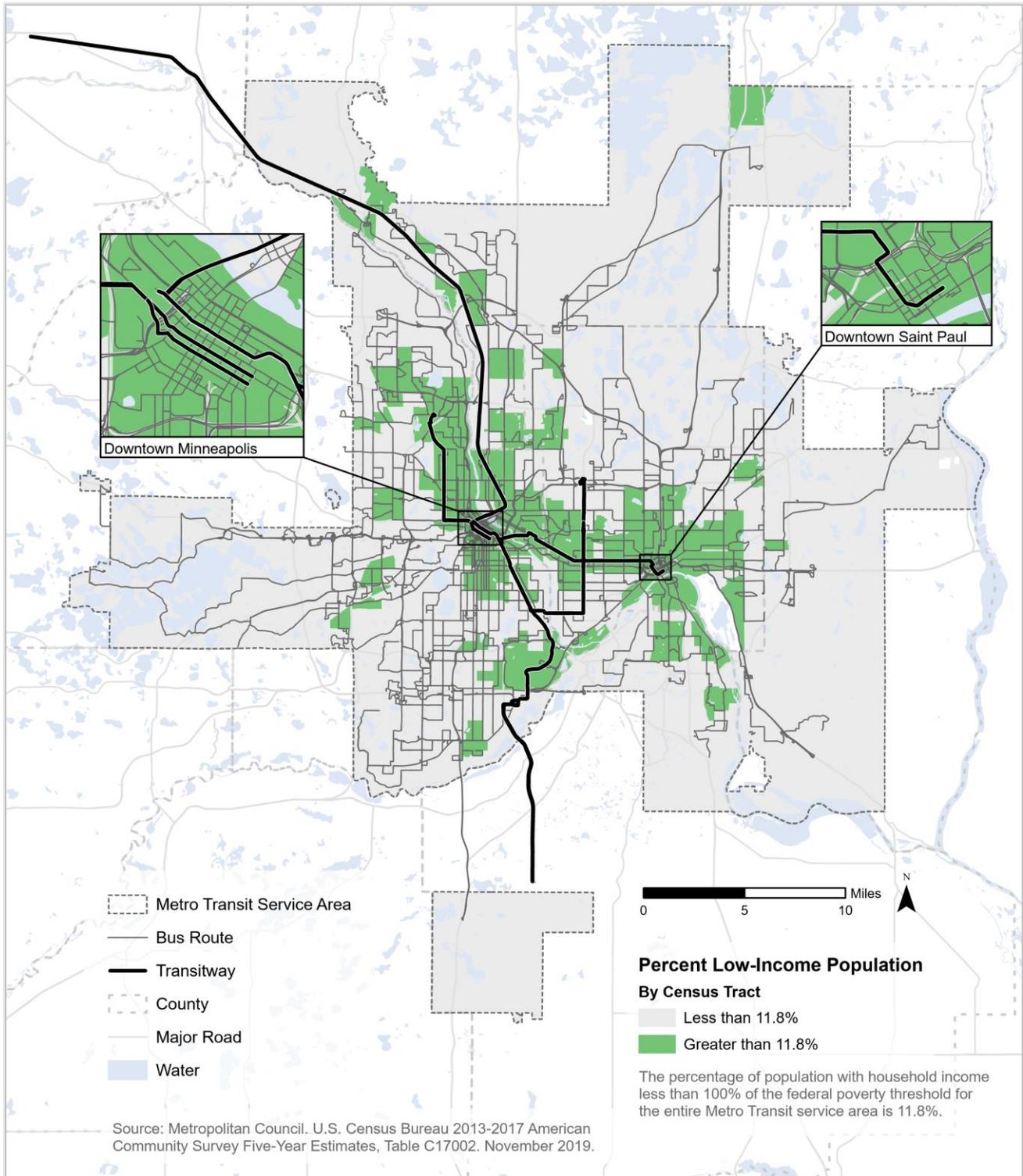


Table 5: Proximity to Metro Transit Service

Population Group	Metro Transit Service Area	Percent within 1/4 Mile of a Bus Stop	Percent within 1/2 Mile of a Transitway Station*
Total Population	2,118,088	78.1%	11.3%
Minority Population	645,480	87.7%	17.1%
Non-Minority Population	1,472,608	73.9%	8.8%
Low-Income Population	245,061	90.8%	20.9%
Non-Low-Income Population	1,830,721	76.3%	9.4%

*LRT, BRT, Northstar Commuter Rail

Source: U.S. Census Bureau 2010 Decennial Census and 2013-2017 American Community Survey Five-Year Estimates; using areal interpolation and the selection of Census blocks to represent service areas.

Existing Facilities

Figure 4 and Figure 5 display existing Metro Transit facilities relative to minority and low-income populations, respectively. Existing facilities include transitways, transitway stations, transit centers, park-and-rides, and operations and maintenance and administration support facilities.

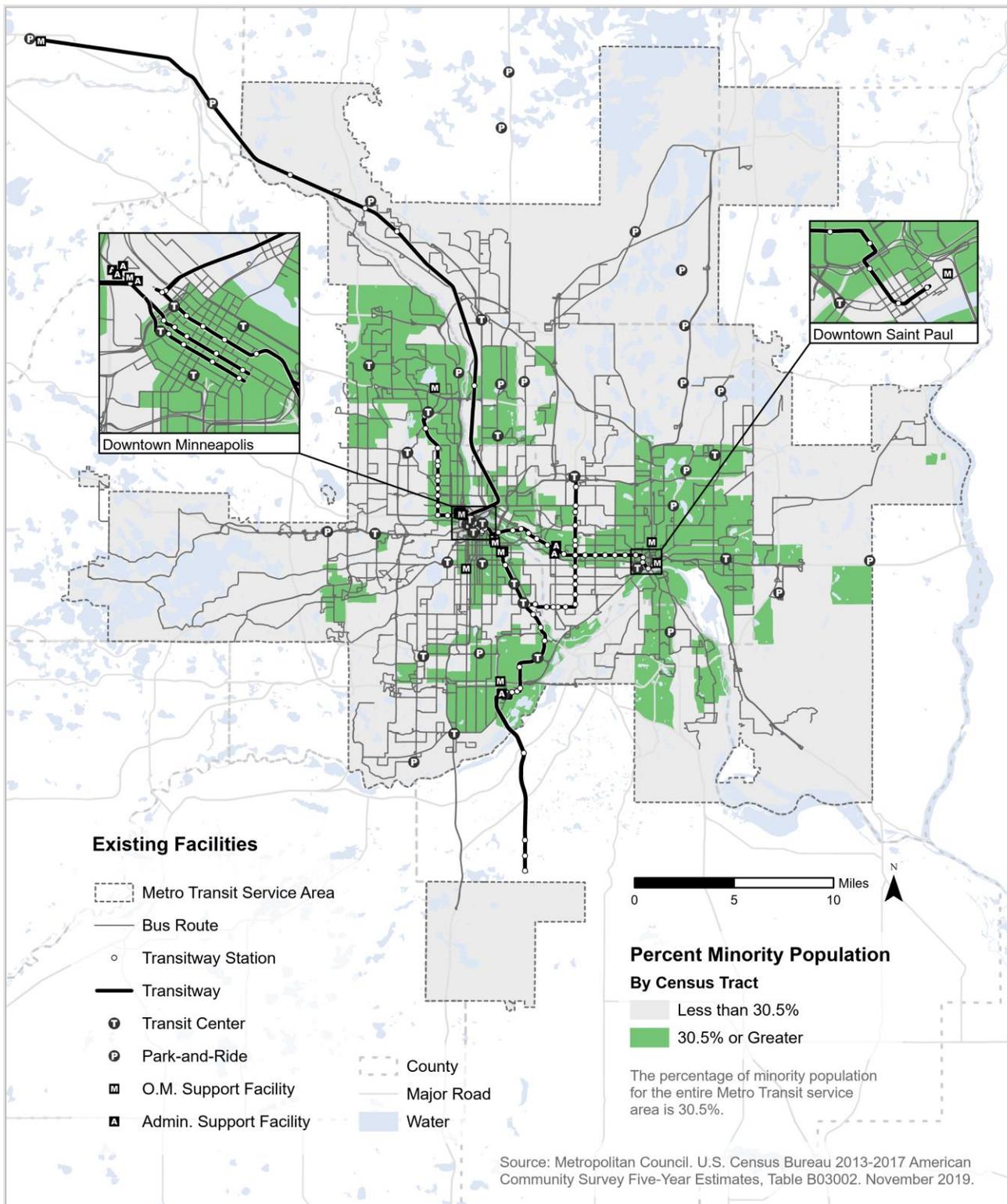
Park-and-ride facilities are surface lots and structured ramps predominantly located outside of the urban center that are served by express bus, BRT, or rail. Park-and-rides are important tools for creating locations with the customer density required to provide cost-effective transit service from suburban and rural areas.

The siting of park-and-ride facilities is based on a number of market conditions and factors. Park-and-rides are optimally located in a congested travel corridor, upstream of major traffic congestion, with service to major regional destinations. Facility design takes into account the cost of construction and land acquisition; site access for vehicles, pedestrians, and cyclists; site visibility; future expansion potential; community and land use compatibility; environmental constraints; and opportunities for joint-use ventures and transit-oriented development.

About half of the park-and-ride facilities served by Metro Transit are located in areas with greater than average percent minority populations (Figure 4); just a few are in areas with above-average percentage of low-income people (Figure 5).

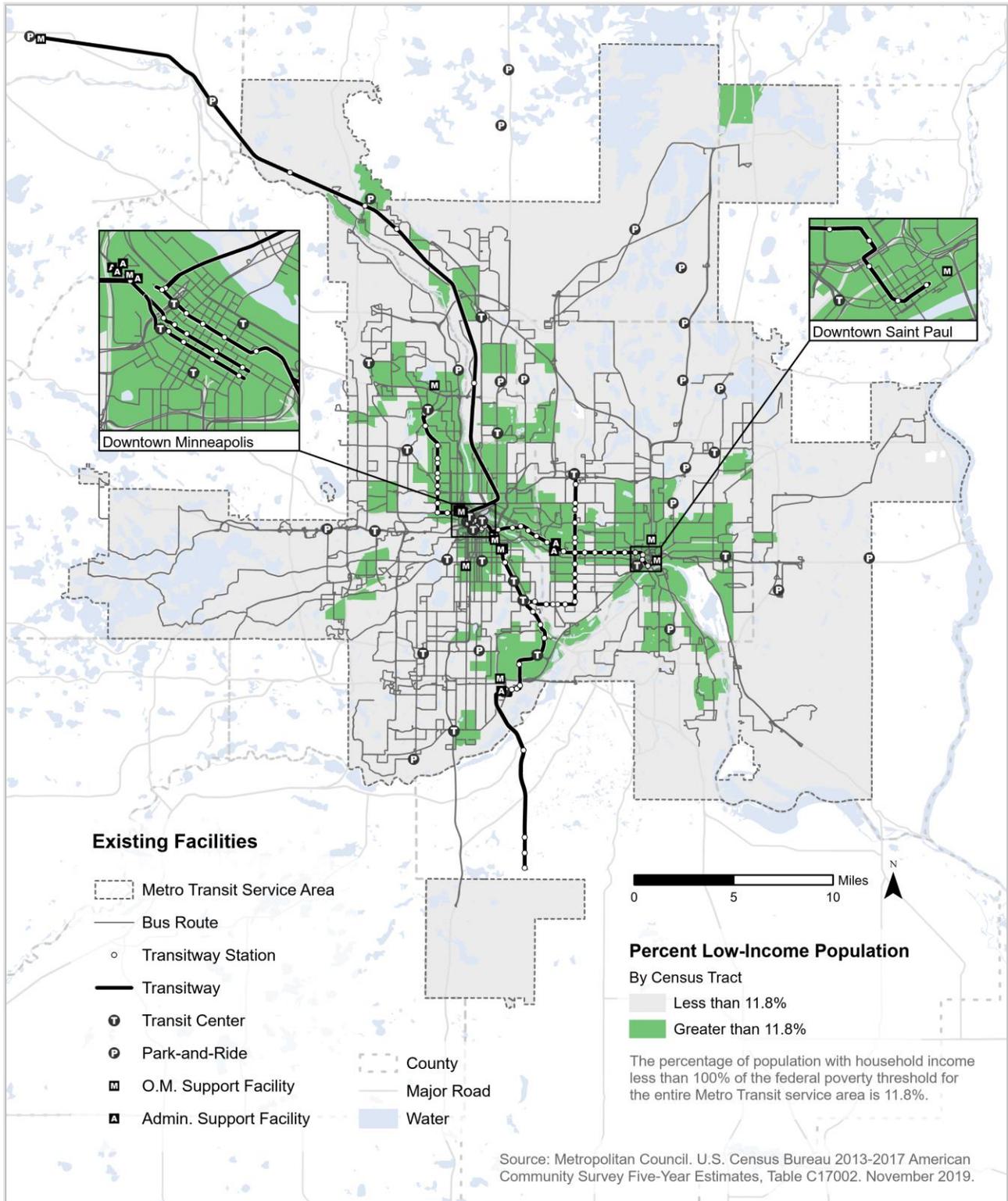
Existing transit centers are predominantly located in census tracts with above-average percentages of minority and low-income populations (Figure 4, Figure 5). Transit centers are locations where two or more transit routes connect to provide comfortable and convenient locations for customers to connect to other routes and services in the system. They are typically located at major activity centers or transitway stations and may be located at a park-and-ride. Transit centers provide customers with shelter, transit information, and other features to enhance the transit customer experience.

Figure 4: Existing Facilities and Percent Minority Population



Metro Transit's bus and rail support facilities are located closer to the core of its service area, proximal to concentrations of transit service. Support facilities are largely located in census tracts with above-average percentages of minority and low-income populations (Figure 4, Figure 5).

Figure 5: Existing Facilities and Percent Low-Income Population



Recently Completed and Planned Facilities

Table 6 lists transit facilities that were recently added, replaced, improved, or are scheduled for an update in the next five years. These facilities are shown relative to minority and low-income populations in Figure 6 and Figure 7. Most recently-completed and planned facility improvements are located in, or planned for, areas with above-average percentages of minority and low-income populations.

Table 6: Recently-Completed and Planned Transit Facility Improvements

Status	Project Name	Project Description
Completed	Downtown Minneapolis LRT Track Replacement	Replacement of light rail track within downtown Minneapolis
Completed	Lake & Hiawatha Bus Shelter Improvement	Enhanced customer waiting facilities (e.g., shelters, real-time signage)
Completed	METRO C Line BRT	Rapid bus corridor between downtown Minneapolis and Brooklyn Center Transit Center
Completed	METRO Red Line BRT Cedar Grove Station Improvement	Construction of a center median platform to allow on-line service to station, improving trip times
Completed	Nicollet Mall Shelter Improvements	Enhanced customer waiting facilities (e.g., shelters, real-time signage)
Completed	Support Facility: Heywood Office and Police Facility Addition	New police facility addition to the Metro Transit Heywood Office Building
Completed	Systemwide Bus Stop Sign Improvements	A redesign and enhancement of bus stop route and schedule information available at all stops system-wide
Completed	US Bank Stadium Station Pedestrian Bridge	Construction of pedestrian bridge over light-rail tracks to facilitate safe crossings and improved transit operations
Ongoing	Better Bus Stops Program	Shelter and ADA improvements focusing on neighborhoods with areas of concentrated poverty
Ongoing	Light Rail and Commuter Rail ADA and Safety Improvements	Ongoing improvements like pedestrian crossing improvements, door locator tiles, and between-car barriers
Ongoing	Mall of America Transit Center Renovation	Improved customer boarding areas and indoor access to mall.
Ongoing	METRO Orange Line BRT	BRT corridor between downtown Minneapolis and Burnsville
Ongoing	MSP Terminal 1	Relocation and improvement of the MSP Terminal 1 bus stop to new ground transportation facility
Ongoing	Real-Time Signs Transit Technology Systems	Place real-time signs at high-ridership bus stops to better inform customers on bus arrival times
Ongoing	Support Facility: Heywood Garage Addition	Addition to the existing Heywood Garage
Planned	I-94 & Manning Park & Ride	Park & Ride expansion via surface lot to increase capacity for I-94 east metro express service market
Planned	Brooklyn Center Transit Center Improvement	Enhance customer boarding areas, including ADA improvements

Status	Project Name	Project Description
Planned	Downtown Minneapolis Hennepin Avenue Bus Customer Facility Improvements	Construction of new shelters with heat/light, real-time information, and other amenities on Hennepin Ave
Planned	Downtown Saint Paul Bus Customer Facility Improvements	Construction of shelter improvements at high-ridership bus stops in downtown Saint Paul
Planned	METRO B Line BRT	Rapid bus corridor between planned SWLRT West Lake Station and Snelling Avenue
Planned	METRO Blue Line Track Replacement - MOA to Terminal 1	Replacement of light rail track and signal components from Mall of America to Terminal 1
Planned	METRO Blue Line Track Replacement - Terminal 1 to 46th St	Replacement of light rail track and signal components from Terminal 1 to 46th St
Planned	METRO D Line BRT	Rapid bus corridor between Brooklyn Center Transit Center and Mall of America
Planned	METRO E Line BRT	Rapid bus corridor between METRO Green Line Stadium Village or Westgate Station to Southdale Transit Center
Planned	METRO Gold Line BRT	BRT corridor between downtown Saint Paul and Woodbury
Planned	METRO Green Line Extension LRT	Light rail corridor between downtown Minneapolis and Eden Prairie
Planned	Mobility Hub Improvements	Strengthen connections between shared mobility and transit uses at strategic locations
Planned	Northtown Transit Center Improvement	Relocation of existing transit center to adjacent location, incorporating enhanced customer boarding areas
Planned	Public Facility Video Surveillance Systems	Replacement and/or construction of new video surveillance systems within the Park & Ride network
Planned	Rosedale Transit Center Improvement	Enhance customer boarding areas, including ADA improvements
Planned	Secure Bike Parking	Construction of 38th St Station bike-and-ride and design of future bike-and-rides
Planned	Support Facility: New Minneapolis Bus Garage	New bus garage in Minneapolis
Planned	Support Facility: Non-revenue shop expansion	Expansion of non-revenue vehicle shop repair space for growth of non-revenue fleet
Planned	Support Facility: Northstar Equipment Storage Building	Addition to existing Northstar Vehicle Maintenance Facility for equipment storage

Figure 6: Recent and Planned Facilities and Percent Minority Population

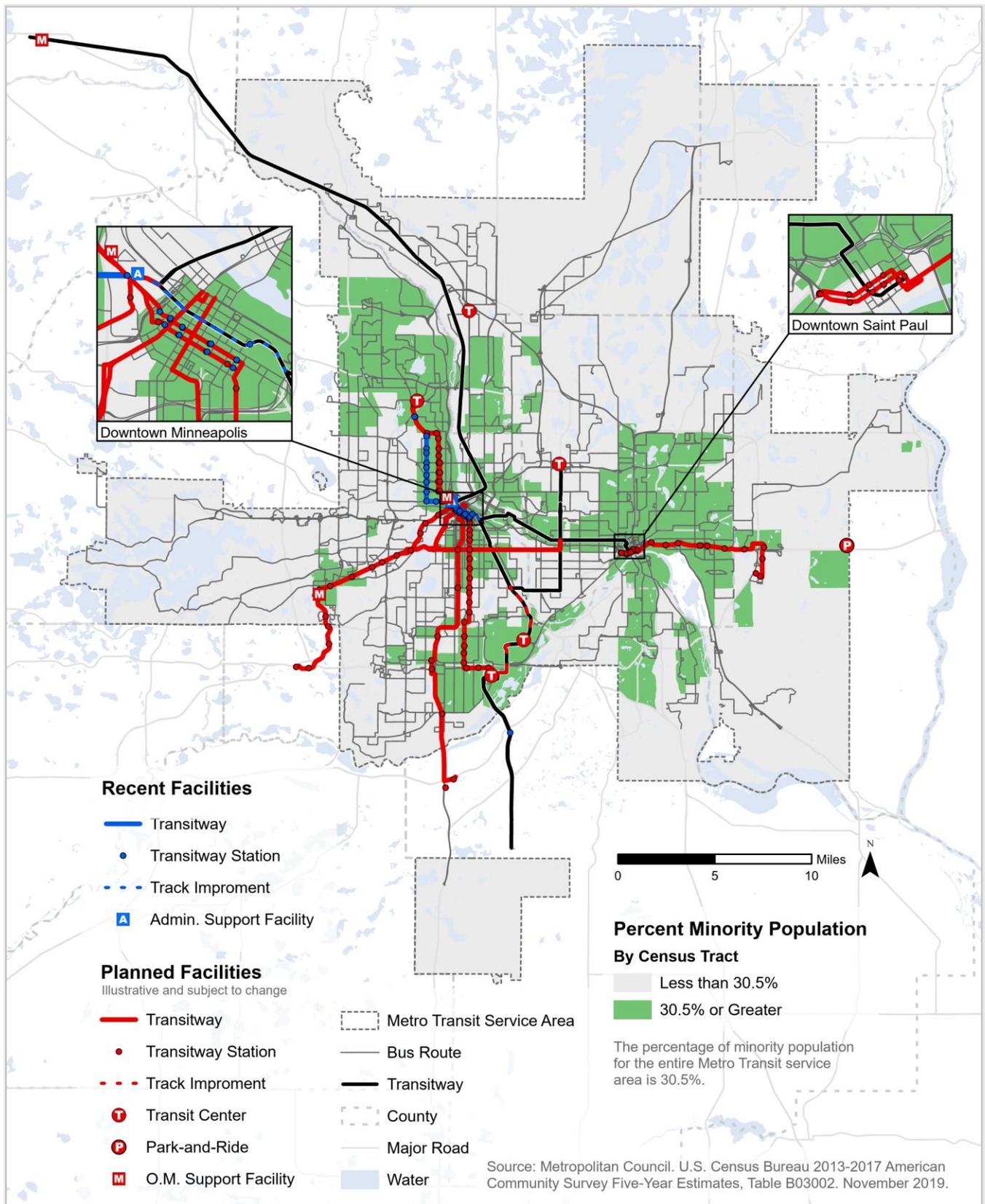
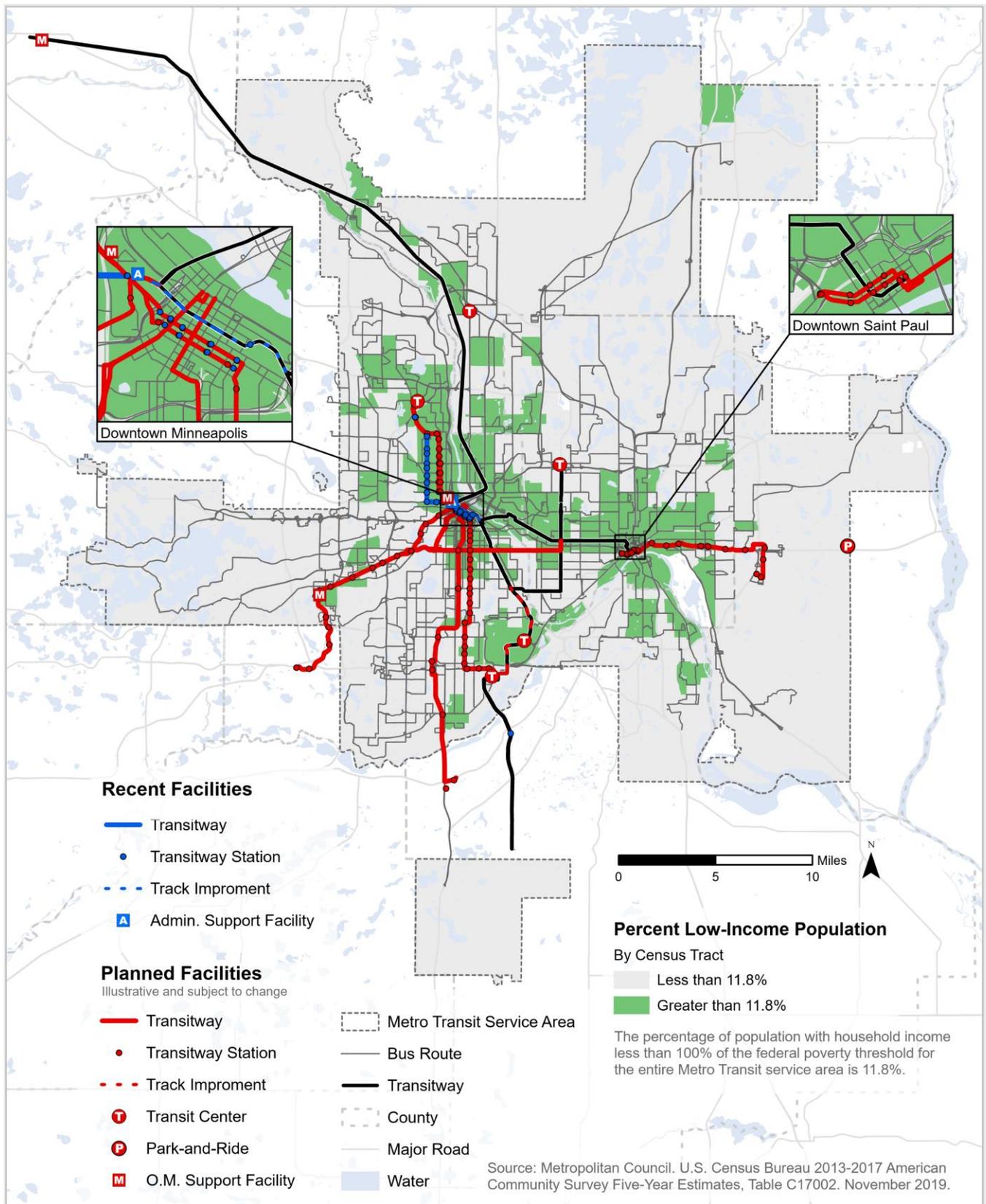


Figure 7: Recent and Planned Facilities and Percent Low-Income Population



Demographic Profiles of Ridership and Travel Patterns

FTA Title VI Circular 4702.1B stipulates the following requirements for data collection related to rider demographics:

Fixed route providers of public transportation [...] shall collect information on the race, color, national origin, English proficiency, language spoken at home, household income and travel patterns of their riders using customer surveys. Transit providers shall use this information to develop a demographic profile comparing minority riders and non-minority riders, and trips taken by minority riders and non-minority riders. Demographic information shall also be collected on fare usage by fare type amongst minority users and low-income users, in order to assist with fare equity analyses.

Metro Transit uses two surveys to collect customer information: the biennial Metro Transit Customer Survey and the Metropolitan Council's Travel Behavior Inventory (TBI) Transit On-Board Survey; the most recent surveys were conducted in 2018 and 2016, respectively. While Metro Transit uses both surveys to better serve its customers, the design and intended purpose of each survey differ.

The Metro Transit Customer Survey is used to understand customer perceptions, satisfaction, likelihood to recommend, and general feedback. In 2018, paper surveys were distributed onto samples of vehicles on all modes (returned in person or by mail), and an identical online version made available and promoted through social media. In total, 7,451 surveys were returned. However, unlike the more robust TBI survey, the results from the Metro Transit Customer Survey are believed to subject to significant response biases.

The Metropolitan Council's TBI 2016 Transit On-Board Survey is one component of the broader TBI program. Conducted continuously over a 10-year cycle, the TBI is a survey of travel in the seven-county region that the Council uses to inform travel forecasting and funding decisions. The TBI uses a variety of methods including household interviews (comprised of travel diaries and some voluntary GPS travel monitoring), transit on-board surveys, airport surveys, an external mail-back survey, and survey of people arriving to the Mall of America. The Council and regional transit providers use these data to update the regional travel-demand forecasting model and understand transit ridership. Additional information on the TBI program is available on the Metropolitan Council's website at <https://metro council.org/Transportation/Planning-2/Transit-Plans,-Studies-Reports/Other-Studies-Reports/Travel-Behavior-Inventory.aspx?source=child>.

The most recent TBI Transit On-Board Survey data were collected in late 2016, using a weighted random sample by ridership by route. It was made available in multiple languages, including English, Spanish, Hmong, and Somali. The TBI Transit On-Board Survey includes origin-destination records for 30,605 transit trips across all regional routes and providers – 27,508 of which are specific to Metro Transit riders (including MTS contracted fixed routes).

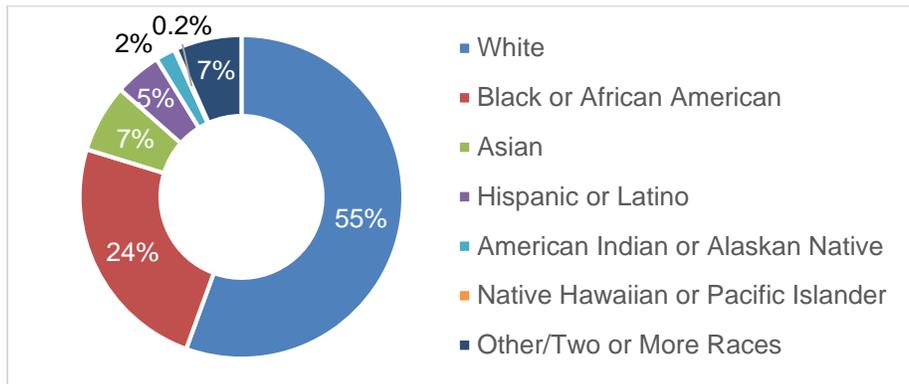
Given its robust sampling methods, the TBI is considered the most accurate source of information on the demographics and travel patterns of Metro Transit customers. As such, the TBI Transit On-Board Survey is the preferred data source for use in the Title VI Program and applicable equity analyses.

Survey Results

The TBI Transit On-Board Survey provides valuable information regarding the travel behavior of Metro Transit riders, some of which is summarized below.³ The survey includes questions regarding race/ethnicity and income level allowing the results to be compared between different population groups.

Approximately 45 percent of Metro Transit customers are people of color (Figure 8), compared to 30.5 percent of the total population within the Metro Transit/Metropolitan Council service area. Those who report their race as Black or African American (and non-Hispanic or Latino) are the largest racial minority group among the Metro Transit customer base.

Figure 8: Race and Ethnicity

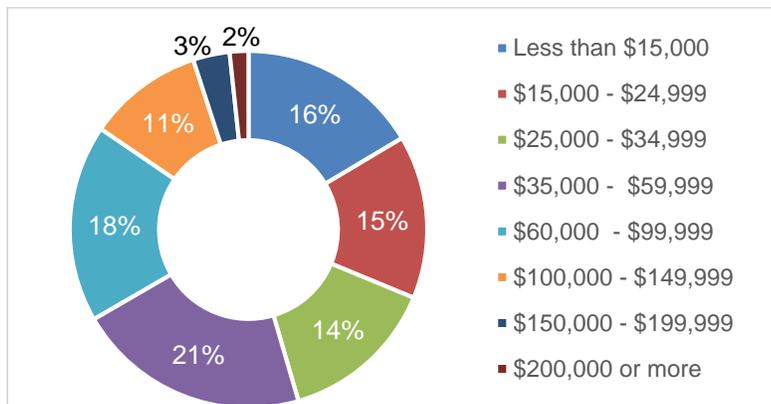


Source: Metropolitan Council TBI Transit On-Board Survey , 2016.

*Other includes car share, taxi, Uber/Lyft, shuttle bus, skateboard, and dial-a-ride

As shown in Figure 9, two-thirds of Metro Transit riders report annual household income of less than \$60,000; 45 percent of all customers report income less than \$35,000.

Figure 9: Annual Household Income

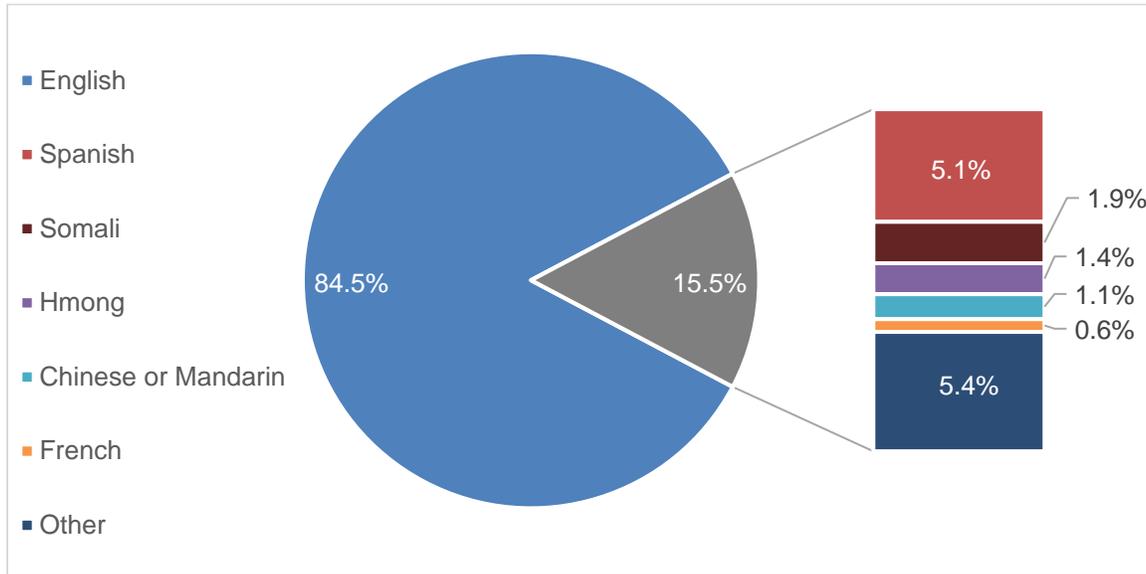


Source: Metropolitan Council TBI Transit On-Board Survey , 2016.

³ Unless otherwise noted, TBI data in this Title VI Program are presented using the dataset's adjusted linked trip weighted factor as a means of representing Metro Transit customers, rather than Metro Transit boardings (unlinked trips).

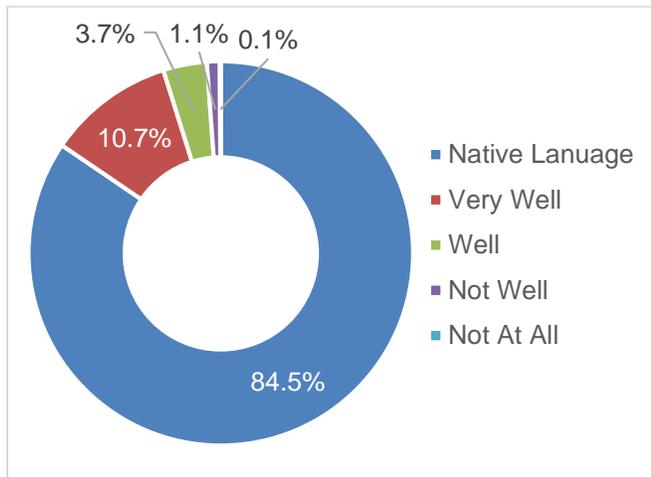
Eighty-five percent of Metro Transit customers speak English as their primary language at home (Figure 10). Spanish, Somali, and Hmong were the next most frequent languages. Among those customers who speak a language other than English in their home, most speak English well or very well (Figure 11).

Figure 10: Language Spoken at Home



Source: Metropolitan Council TBI Transit On-Board Survey , 2016.

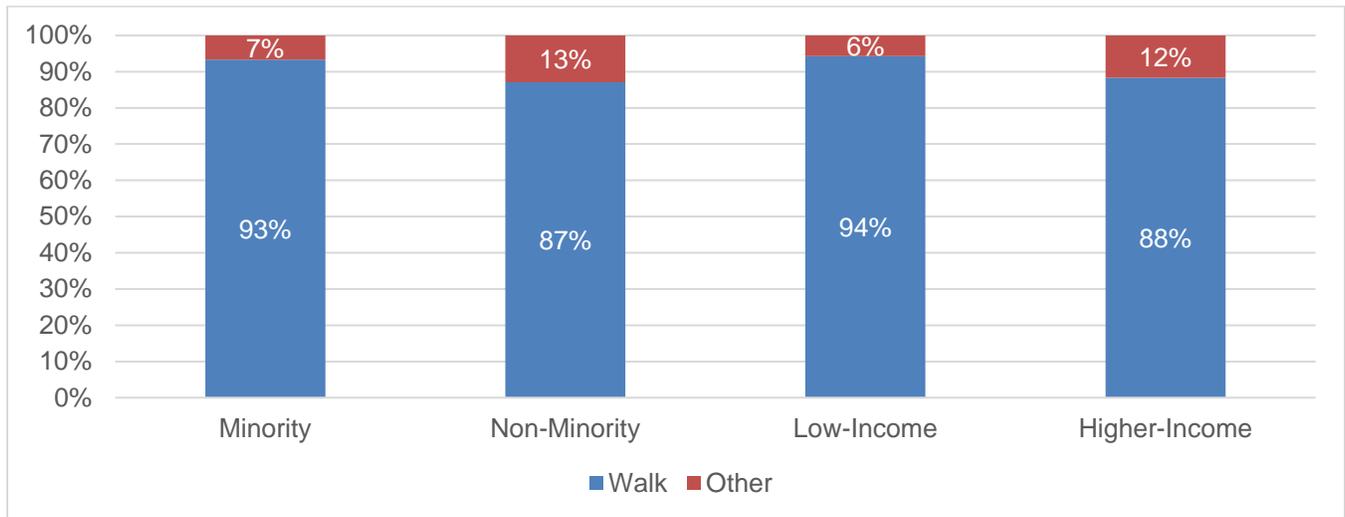
Figure 11: Ability to Speak English



Source: Metropolitan Council TBI Transit On-Board Survey , 2016.

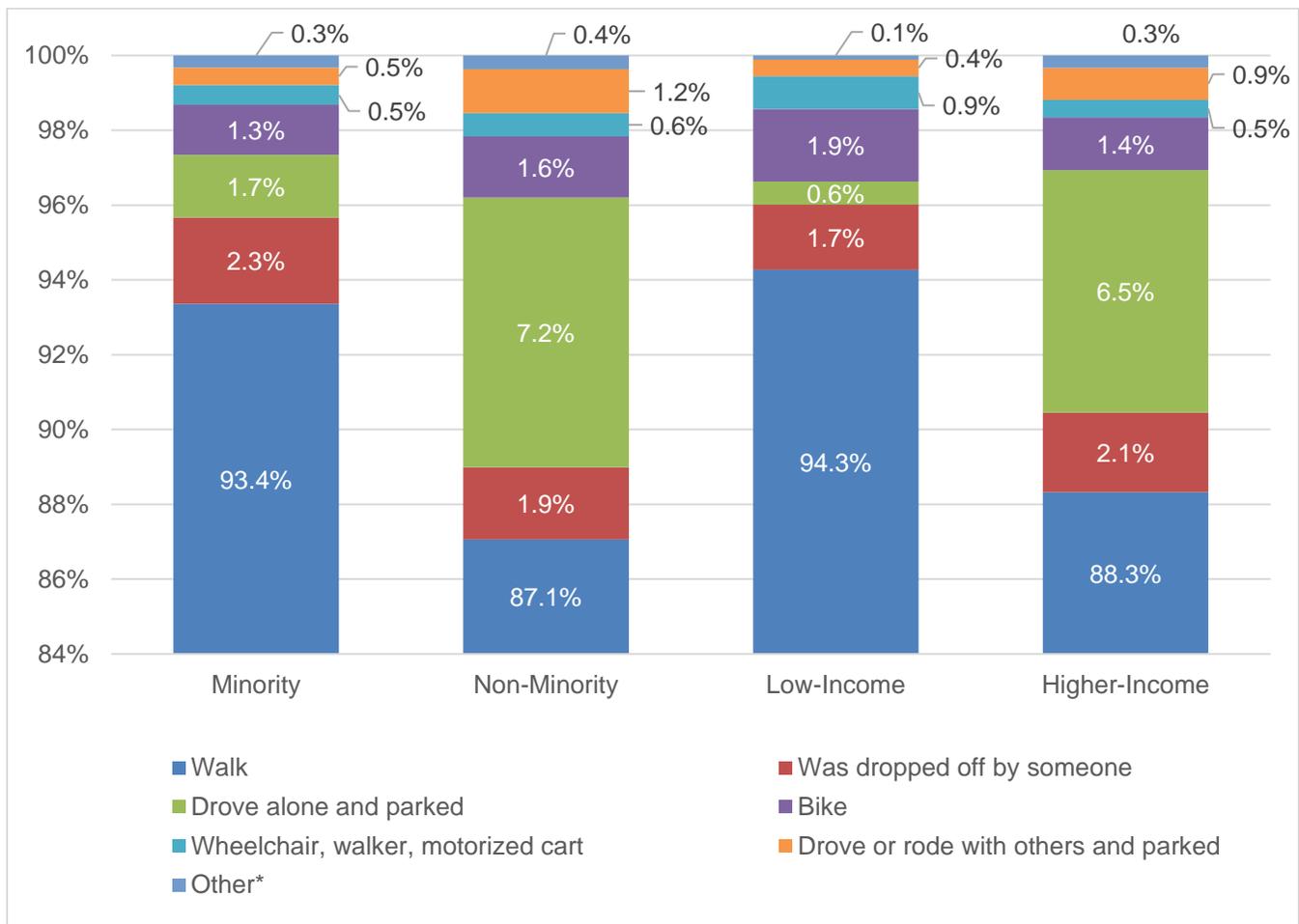
Shown in Figure 12, the vast majority of Metro Transit passengers walk to access transit. However, notable differences in access mode exist between minority and non-minority customers, and low-income and higher-income customers. Minority and low-income customers are both more likely to walk to access transit than their counterparts – by about six percentage points. Alternatively, non-minority and higher-income customers are more likely to drive alone to access transit compared to minority and low-income customers, respectively (Figure 13). Similar trends are observed for mode of egress from transit, as shown in Figure 14 and Figure 15.

Figure 12: Mode of Access



Source: Metropolitan Council TBI Transit On-Board Survey , 2016.

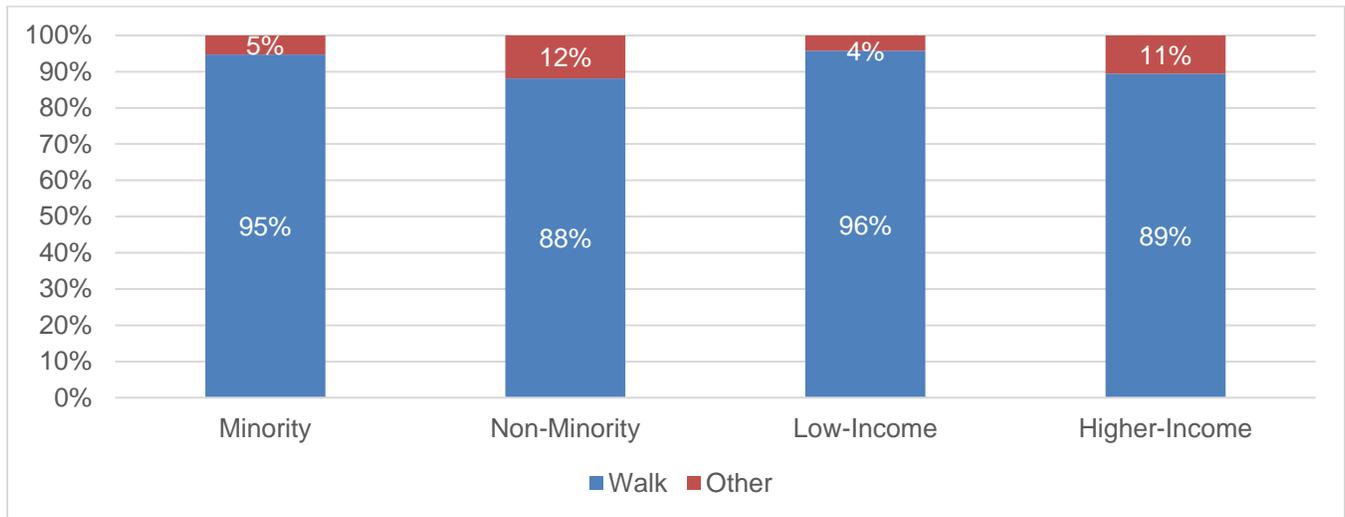
Figure 13: Mode of Access (Detail)



Source: Metropolitan Council TBI Transit On-Board Survey , 2016.

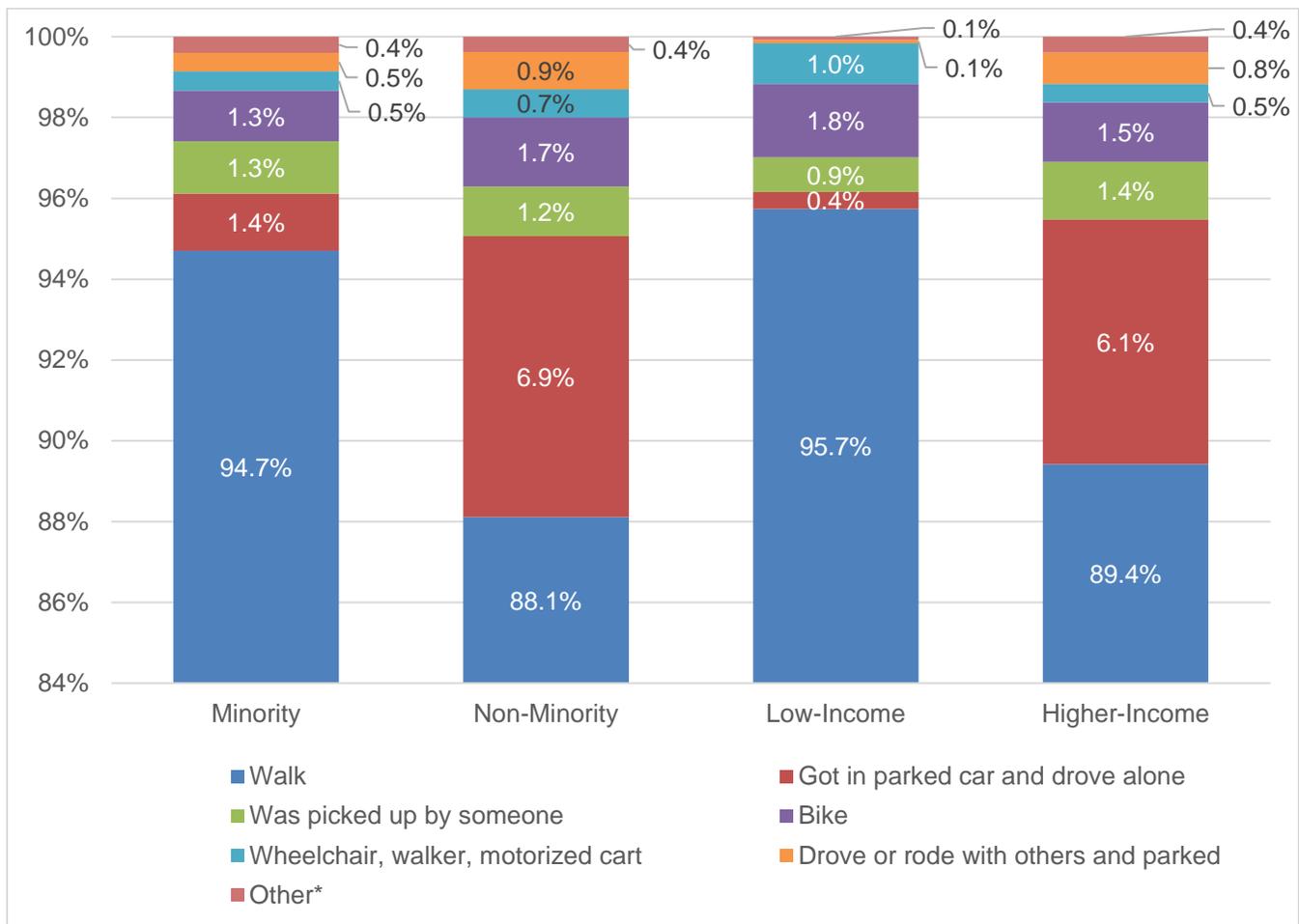
*Other includes car share, taxi, Uber/Lyft, shuttle bus, skateboard, and dial-a-ride

Figure 14: Mode of Egress



Source: Metropolitan Council TBI Transit On-Board Survey , 2016.

Figure 15: Mode of Egress (Detail)

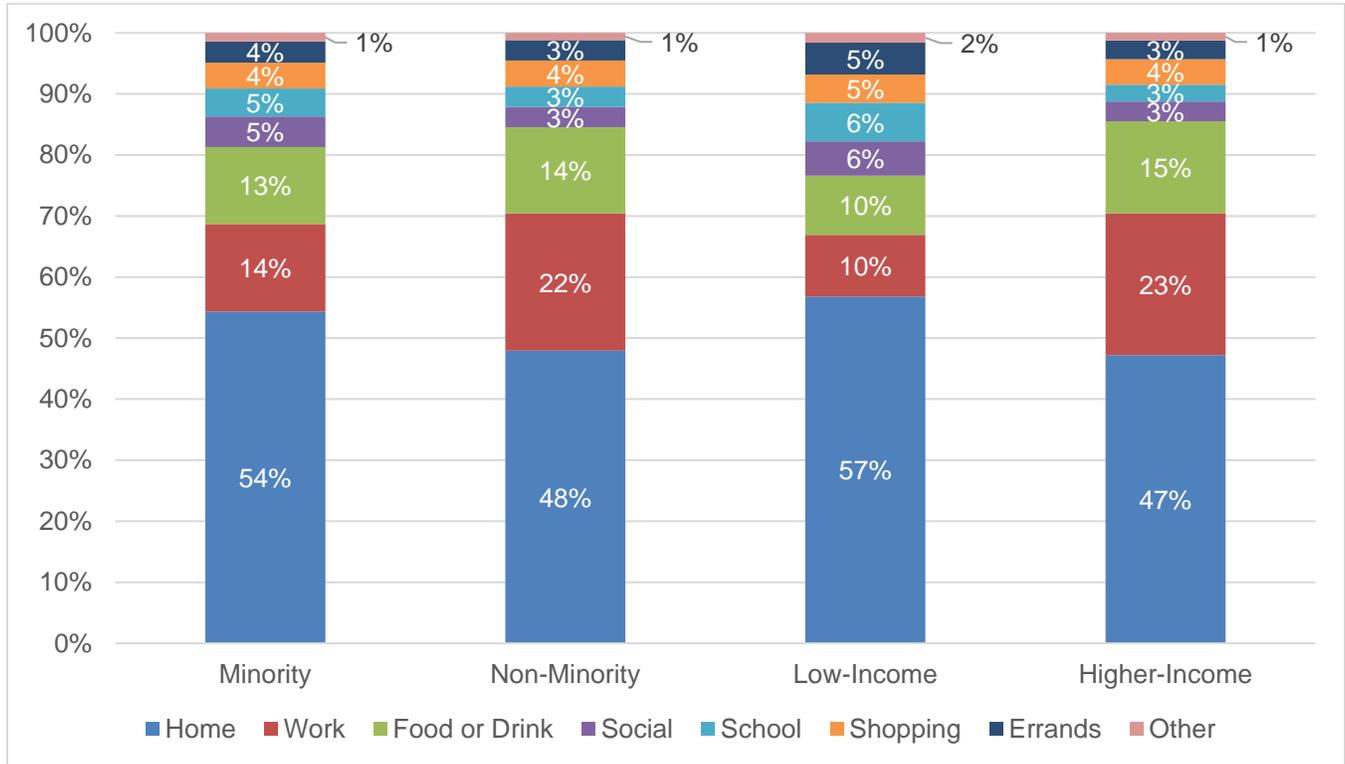


Source: Metropolitan Council TBI Transit On-Board Survey , 2016.

*Other includes car share, taxi, Uber/Lyft, shuttle bus, skateboard, dial-a-ride, and scooter/motorcycle

Aside from traveling home, taking transit to go to work and to buy a meal or drink are Metro Transit customers' most frequent trip purposes (Figure 16). Non-minority and higher-income riders used transit more frequently for work than minority and low-income riders, respectively.

Figure 16: Trip Purpose

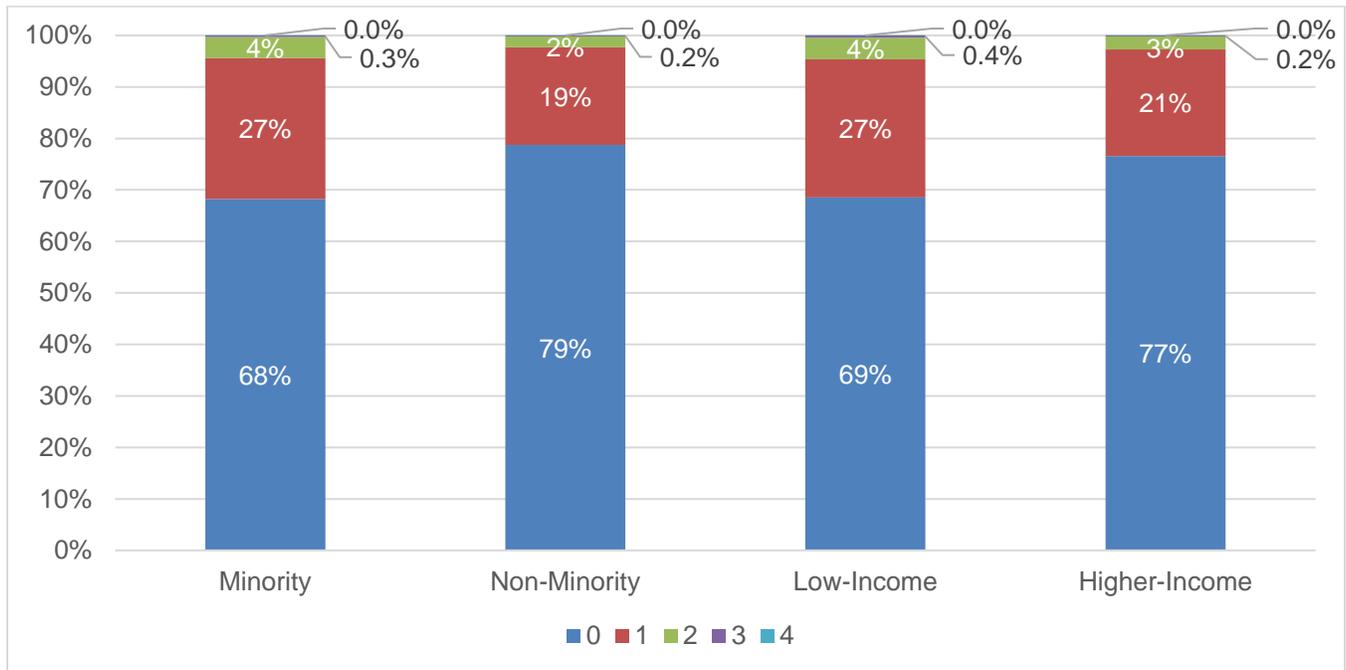


Source: Metropolitan Council TBI Transit On-Board Survey , 2016.

Both minority and low-income riders are more likely to require at least one transfer to complete their trip than non-minority and higher-income riders, respectively (Figure 17). Less than five percent of all customers require two or more transfers as part of their one-way transit trip.

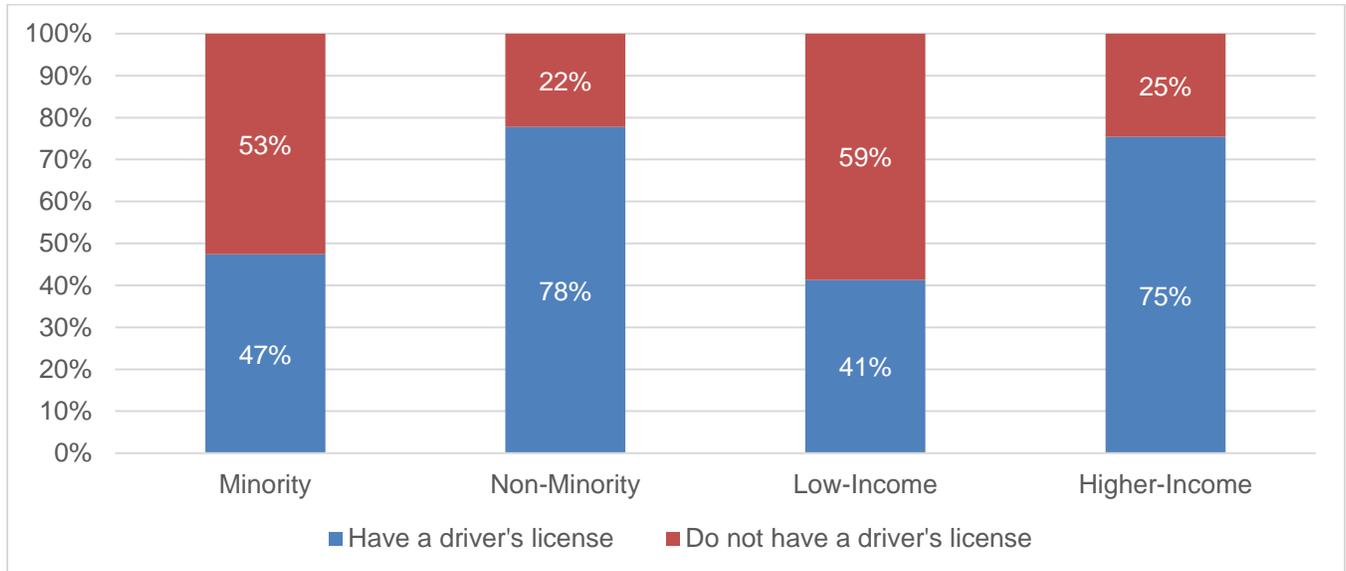
Figure 18 shows the stark differences in rates of possessing a driver's license between Metro Transit customers. More than half of minority and low-income riders do not have a driver's license. About one quarter of non-minority and higher-income riders do not have a driver's license.

Figure 17: Number of Transfers per One-Way Trip



Source: Metropolitan Council TBI Transit On-Board Survey , 2016.

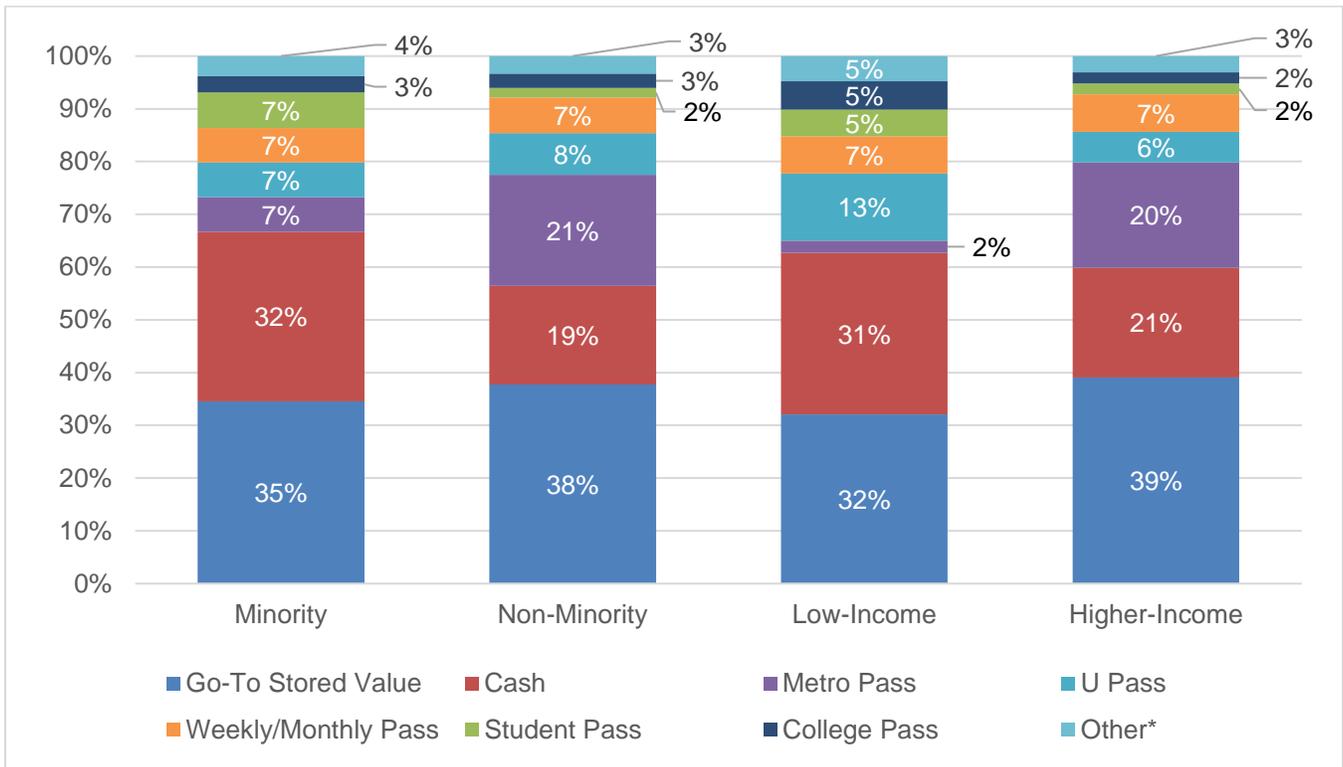
Figure 18: Riders with a Driver's License



Source: Metropolitan Council TBI Transit On-Board Survey , 2016.

When paying their fare, minority riders are more likely to use cash than non-minority riders (Figure 19); this pattern is similar based on income, with low-income riders using cash fare at greater rates than higher-income riders. Non-minority riders are three time more likely than minority riders to pay their fare using Metro Pass – a fare instrument provide to employees by companies and organizations; the difference is even greater based on income, with higher-income riders using Metro Pass at 10 times the rate of low-income riders.

Figure 19: Fare Payment Method

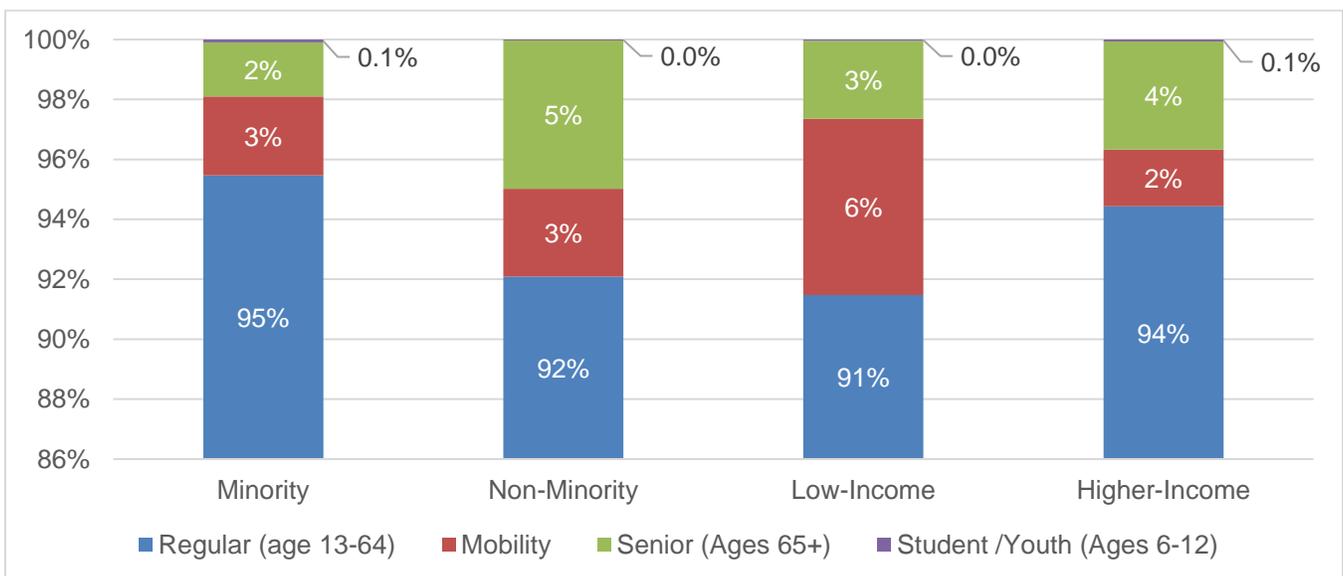


Source: Metropolitan Council TBI Transit On-Board Survey , 2016.

*Other includes free ride pass (veterans), 10-ride pass, day pass, token, free fare zone, and mobile ticket

Passengers who purchase fares at the Senior (ages 65 and over) rate are more likely to be white and higher-income (Figure 20). Low-income passengers are more likely to purchase a Mobility fare – available to persons with disabilities – than people of higher incomes.

Figure 20: Fare Type



Source: Metropolitan Council TBI Transit On-Board Survey , 2016.

Service and Fare Equity Analyses

The Title VI Circular requires that transit providers which are located in an urbanized area with a population of more than 200,000 and which operate 50 or more vehicles in peak service evaluate the equity impacts of proposed service and fare changes on minority and low-income populations.

In order to accomplish this, transit providers are required to develop a “major service change” policy to determine when an equity analysis is required. They are also required to develop policies for determining when a proposed major service change will result in a disparate impact to minority populations and/or a disproportionate burden to low-income populations. The Circular requires that a public engagement process be included as part of the setting of these policies.

Metro Transit Service and Fare Change Policies

Major Service Change Policy

Metro Transit’s Major Service Change policy is as follows:

All increases or decreases in fixed route service meeting the threshold require a Title VI Service Equity Analysis prior to implementation. The equity analysis must be approved by the Metropolitan Council and a record included in the agency’s Title VI Program.

Major service changes meet at least one of the following criteria:

- a) *For an existing route(s), one or more service changes resulting in at least a 25 percent change in the daily in-service hours within a 12-month period (minimum of 3,500 annual in-service hours).*
- b) *A new route in a new coverage area (minimum net increase of more than 3,500 annual in-service hours).*
- c) *Restructuring of transit service throughout a sector or sub-area of the region as defined by Metro Transit.*
- d) *Elimination of a transit route without alternate fixed route replacement.*

The following service changes are exempt:

- a) *Seasonal service changes.*
- b) *Route number or branch letter designation.*
- c) *Any change or discontinuation of a demonstration route within the first 24 months of operation.*
- d) *Changes on special service routes such as State Fair, sporting events, and special events.*
- e) *Route changes caused by an emergency. Emergencies include, but are not limited to, major construction, labor strikes, and inadequate fuel supplies.*
- f) *Any service change that does not meet the conditions of a major service change as defined above.*

Disparate Impact and Disproportionate Burden Policies

Metro Transit’s Disparate Impact and Disproportionate Burden policies are as follows:

The Metropolitan Council will use the “four-fifths” rule as the threshold to determine if a proposed fare change, major service change, or triennial monitoring review of system-wide standards and policies shows evidence of potential for disparate impact or disproportional burden. The “four-fifths” rule measures when 1) adverse impacts are borne disproportionately by minority or low-income populations and 2) benefits are not equitably shared by minority or low-income populations.

The “four-fifths” rule states that there could be evidence of disparate impact or disproportional burden if:

- Benefits are being provided to minority or low-income populations at a rate less than 80 percent (four-fifths) than the benefits being provided to non-minority or non-low-income populations.
- Adverse effects are being borne by non-minority or non-low-income populations at a rate less than 80 percent (four-fifths) than the adverse effects being borne by minority or low-income populations.

If a potential disparate impact for minority populations is found, FTA requires recipients to analyze alternatives. A provider may modify the proposed change to avoid, minimize, or mitigate potential disparate impacts. A transit provider may proceed with the proposed change if there is a substantial legitimate justification and no legitimate alternatives exist with a less disparate impact that still accomplish the provider’s legitimate program goals.

If potential disproportionate burden on low-income populations is found, FTA requires recipients to take steps to avoid, minimize, or mitigate impacts where practicable.

Public Outreach

An extensive public outreach effort was made by Metro Transit staff before the Service and Fare Change policies were set. In December 2012, Metro Transit Service Development staff met with representatives from eight organizations focused on environmental and social justice to discuss the requirements of the new Title VI Circular and seek input on how these policies should be defined. These organizations included:

- African American Leadership Forum
- Alliance for Metropolitan Stability
- District Councils Collaborative of Saint Paul and Minneapolis
- ISAIAH
- Minneapolis Urban League
- Minnesota Center for Environmental Advocacy
- Northside Transportation Network
- Saint Paul NAACP
- Transit for Livable Communities

In addition, staff reviewed the Title VI policies of many peer agencies across the county. Policies from systems in Los Angeles, Washington, D.C., Fort Worth, Houston, Atlanta, and Portland were reviewed.

Five public hearings were held in February 2013; their times and locations are listed in Table 7. The hearings were promoted in Connect (Metro Transit’s on-board newsletter) and on the Metropolitan Council, Metro Transit, MVTA, and SouthWest Transit websites. Notices were posted in the *State Register*, *Star Tribune*, *Pioneer Press*, *Finance & Commerce*, *Capitol Report*, *Anoka County Union*, *Waconia Patriot*, *Rosemount Town Pages*, *Shakopee Valley News*, *Lillie Suburban Newspaper*, *Asian American Press*, and the *MN Spokesman Recorder*. In addition, a press release was issued to local newspapers.

Comments were accepted by testifying at a public hearing, via e-mail, fax and US Mail, TTY, and by leaving comments on the Council’s Public Comment Line. The public comment period closed on February 25, 2013. Comments were received from seven individuals, although many comments did not specifically relate to the proposed Title VI policies.

Table 7: Public Hearings Held to Inform Service and Fare Change Policies

Date and Time	Location
Wednesday, February 6, 2013 6:00p.m.-7:30 p.m.	SouthWest Station, Eden Prairie*
Thursday, February 7, 2013, 6:00 p.m.-7:30 p.m.	Burnhaven Library, Burnsville**
Saturday, February 9, 2013, 12:30 p.m.-2:00 p.m.	Augsburg Library, Richfield
Tuesday, February 12, 2013, 11:00 a.m.-12:30 p.m.	Minneapolis Urban League, Minneapolis
Wednesday, February 13, 2013, 6:00 p.m.-7:30 p.m.	East Side YMCA, Saint Paul

*Joint with SouthWest Transit **Joint with MVTA

The Metropolitan Council unanimously approved the Title VI Program Major Change and Disparate Impact and Disproportionate Burden Policies at its June 26, 2013 meeting; the minutes from this meeting are included in Attachment F.

Evaluation Methodology

The Title VI Circular requires that the equity impacts of all proposed fare and major service changes be evaluated before implementation during their planning stages. The procedures Metro Transit uses to evaluate each type of change are summarized below. While these are the methods currently used, Metro Transit may use a modified approach based on the availability of data and the specific characteristics of each fare or major service change.

Service Equity Analyses

A GIS-based approach is used in the service equity analyses to measure the location and magnitude of proposed service changes and compare the distribution of impacts and benefits to minority, non-minority, low-income, and non-low-income populations. The typical analysis consists of five steps:

1. Model current and proposed service levels.
2. Spatially allocate current and proposed transit service levels to population groups based on intersection between service buffer and census block.
3. Calculate the percent change in service between the current and proposed service levels for each census block.
4. Calculate the average percent change in service for all minority/low-income and non-minority/non-low-income populations within the service change area for the current and proposed transit service.
5. Determine whether the proposed service will result in disparate impacts or disproportionate burdens by applying the disparate impact and disproportionate burden policies.

This method uses the number of weekly trips available to each census block as a measure of overall transit service levels. Common improvements to transit service, such as increased frequency and increased span of service, will result in an increase in the number of trips available. The addition of service to a new area will also result in an increase in the number of trips available to the surrounding areas.

Four-Fifths Threshold

FTA defines “disparate impacts” as facially neutral policies or practices that disproportionately affect members of a group identified by race, color, or national origin, and the recipient’s policy or practice lacks a substantial legitimate justification. If the results of the analysis indicate a potential for disparate impacts, further investigation is required. As shown above, Metro Transit has defined its disparate impact threshold using the “four-fifths” rule.

The four-fifths rule originates from employment law but is applied in this setting to compare the distribution of benefits and/or adverse impacts among various population groups. The four-fifths rule suggests that a selection rate for any racial, ethnic, or gender group that is less than four-fifths (80 percent) of the rate for the group with the highest selection rate will be regarded as evidence of adverse impact. Although it is a general principle and not a legal definition, the four-fifth rule is a practical method for identifying adverse impacts that require mitigation or avoidance.

Metro Transit uses a similar approach when comparing the distribution of benefits and adverse impacts for low-income and non-low-income populations. However, when the distributions for low-income populations fall outside of the four-fifths threshold, this is referred to as a disproportionate burden rather than a disparate impact.

In service equity analyses, if the quantitative results indicate that the service changes provide benefits to minority/low-income groups at a rate less than 80 percent of the benefits provided to non-minority/non-low-income groups, there could be evidence of disparate impacts/disproportionate burdens. If disparate impacts or disproportionate burdens are found using this threshold, mitigation measures should be identified. For example, if the evaluation finds that the average non-minority person will see a 10 percent increase in service, the average minority person must see at least an 8 percent increase in service to meet the four-fifths threshold.

As an alternative example, if the results for a proposed service reduction indicate that the average minority person would experience a 20 percent reduction in service, the average non-minority person must see at least a 16 percent reduction in service.

Fare Equity Analyses

Fare equity analyses use a survey-based approach to measure the relative impact of proposed fare changes on minority, non-minority, low-income, and non-low-income populations. Passenger surveys are used to identify the race/ethnicity, household size, and household income for each passenger. This information is then tied to the fare payment type used by the passenger. This survey information, in conjunction with proposed percent change for each fare payment type, is used to calculate the average percent change in fare for minority, non-minority, low-income, and non-low-income riders. The four-fifths threshold is then applied to determine whether there might be disparate impacts or disproportionate burdens.

Recent Equity Analysis Results

Three service equity analyses and one fare equity analysis were completed between July 2016 and July 2019 (Table 8). In each evaluation, the proposed change was found to have no potential for disparate impact to minority populations or disproportionate burden to low-income populations. These equity analyses and documentation of approval are shown in Attachment G.

Table 8: Equity Analysis Results

Equity Analysis Project	Potential for Disparate Impact	Potential for Disproportionate Burden
Regional Fare Change (2017)	No	No
West End and Route 9 Study (2017)	No	No
C Line and Route 19 (2019)*	No	No
Route 614 Elimination (2019)**	No	No

*C Line and Route 19: Analysis was completed in Spring 2019 and no potential for disparate impact or disproportionate burden was identified. Metro Transit did not specifically call out the results of the analysis when presenting to the Metropolitan Council.

**Route 614 Elimination: Analysis was completed in Spring 2019 and no potential for disparate impact or disproportionate burden was identified. Metro Transit did not specifically call out the results of the analysis when seeking Metropolitan Council approval.

System-Wide Service Standards and Policies

FTA Title VI Circular 4702.1B provides the following direction for system-wide standards and policies of fixed route transit providers:

All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide. Fixed route modes of service include but are not limited to, local bus, express bus, commuter bus, bus rapid transit, light rail, subway, commuter rail, passenger ferry, etc. These standards and policies must address how service is distributed across the transit system, and must ensure that the manner of the distribution affords users access to these assets.

The Metropolitan Council has established a set of service standards and policies to guide the provision of transit service in the region. Many of these standards and policies are outlined in Appendix G of the Metropolitan Council’s 2040 Transportation Policy Plan. In most instances, Metro Transit maintains the same service standards and policies established by the Metropolitan Council for all of the region’s transit providers. However, Metro Transit has set and monitors additional standards that are specific to its service delivery, which have the approval of the Metropolitan Council.

Each standard or policy is explained in detail below. In accordance with the Title VI Circular, service standards and policies have been developed for the following measures:

- Vehicle Load
- Service Frequency
- On-Time Performance
- Service Availability
- Distribution of Amenities
- Vehicle Assignment

Transit Market Areas

Several of the Metropolitan Council’s (and Metro Transit’s) service standards and policies are dependent on the geographic location of the service – more specifically, which transit market area it is in. Transit market areas are a tool used by the Council to guide transit planning decisions. They help ensure that the types and levels of transit service provided, in particular fixed route bus service, match the expected demand in a given area. The Council’s Transportation Policy Plan defines unique transit market areas based on a combination of population density, employment density, automobile availability, and intersection density (Table 9).

Market Area I is the most transit supportive with the highest relative concentration of people and jobs likely to use transit, plus the most transit-supportive street networks. As such, Market Area I typically can support the highest levels of transit service. Market Area V is the least transit supportive with lowest population and employment densities. Service standards by transit market area represent typical design guidelines for transit service. However, some exceptions exist based on specific conditions.

Table 9: Transit Market Areas

Transit Market Area	Propensity to Use Transit	Typical Transit Service
Market Area I	Highest potential for transit ridership	Dense network of local routes with highest levels of service accommodating a wide variety of trip purposes. Limited stop service supplements local routes where appropriate.
Market Area II	Approximately ½ ridership potential of Market Area I	Similar network structure to Market Area I with reduced level of service as demand warrants. Limited stop services are appropriate to connect major destinations.
Market Area III	Approximately ½ ridership potential of Market Area II	Primary emphasis is on commuter express bus service. Suburban local routes providing basic coverage. General public dial-a-ride complements fixed route in some cases.
Market Area IV	Approximately ½ ridership potential of Market Area III	Peak period express service is appropriate as local demand warrants. General public dial-a-ride services are appropriate.
Market Area V	Lowest potential for transit ridership	Not well-suited for fixed route service. Primary emphasis is on general public dial-a-ride services.
Emerging Market Overlay	Varies. Typically matches surrounding Market Area.	Varies. Typically matches surrounding Market Area.
Freestanding Town Center	Varies. Typically matches surrounding Market Area.	Varies. Potential for local community circulator as demand warrants. Some peak period commuter express service may be appropriate.

Route Type

In addition to transit market area, many of the standards also depend on the type of route being evaluated. Each route type is designed for distinct situations and goals, as summarized below.

- **Core Local Bus** routes typically serve the denser urban areas of Market Areas I and II, usually providing access to a downtown or major activity center along important commercial corridors. They form the base of the core bus network and are typically some of the most productive routes in the system. Some Core Local Bus routes are supplemented with a limited stop route

designed to serve customers wishing to travel farther distances along the corridor. Limited stop routes make fewer stops and provide faster service than the Core Local routes.

- **Supporting Local Bus** routes are typically designed to provide crosstown connections within Market Areas I and II. Typically, these routes do not serve a downtown but play an important role connecting to Core Local routes and ensuring transit access for those not traveling downtown.
- **Suburban Local Bus** routes typically operate in Market Areas II and III in a suburban context and are often less productive than Core Local routes. These routes serve an important role in providing a basic level of transit coverage throughout the region.
- **Commuter Express Bus** routes primarily operate during peak periods to serve commuters to downtown or a major employment center. These routes typically operate non-stop on highways for portions of the route between picking up passengers in residential areas or at park-and-ride facilities and dropping them off at a major destination.
- **Arterial Bus Rapid Transit (BRT)** lines operate in high demand urban arterial corridors with service, facility, and technology improvements that enable faster travel speeds, greater frequency, an improved passenger experience, and better reliability. Design guidelines for arterial BRT can be found in the Regional Transitway Guidelines.
- **Highway Bus Rapid Transit (BRT)** lines operate in high demand highway corridors with service, facility, and technology improvements providing faster travel speeds, all-day service, greater frequency, an improved passenger experience, and better reliability. Design guidelines for highway BRT can be found in the Regional Transitway Guidelines.
- **Light Rail** operates using electrically powered passenger rail cars operating on fixed rails in dedicated right-of-way. It provides frequent, all-day service stopping at stations with high levels of customer amenities and waiting facilities. Design guidelines for light rail can be found in the Regional Transitway Guidelines.
- **Commuter Rail** operates using diesel-power locomotives and passenger coaches on traditional railroad track. These trains typically only operate during the morning and evening peak period to serve work commuters. Design guidelines for commuter rail can be found in the Regional Transitway Guidelines.

Vehicle Load

Metro Transit's maximum load standards are shown in Table 10. Vehicle load standards consider the seating capacity of various bus types, the route type, and time of day (i.e., peak or off-peak). While the availability of seating is a contributing factor to a pleasant transit experience, it is not always feasible during peak periods. Standing loads (i.e., a vehicle load in excess of the seating capacity) are acceptable in some instances, such as on light rail vehicles and during peak service. The exceptions to this are maximum peak loads on Commuter/Express service with more than four miles of travel on freeways, where the load standards are equal to seating capacity regardless of time of day.

Occasional overloads are to be expected due to natural variations in transit demand and special events. Metro Transit considers vehicle overloads (i.e., exceeding the standard) to be an issue needing to be addressed if they are consistently overloaded. An individual route trip is considered consistently overloaded if an overload occurs 40 percent or more of the time (two weekdays per five weekdays).

Vehicle load data are continuously collected aboard buses using automatic passenger counter (APC) equipment. However, similar vehicle load data are not available for LRT or Northstar Commuter Rail

service. Periodic in-person spot checks of the LRT system are conducted by Metro Transit staff to assess ridership and vehicle load patterns. Vehicle loads on NorthStar Commuter Rail vehicles are monitored by conductors. No significant overload issues have been identified for either service during standard (non-event-related) service.

Table 10: Vehicle Loading Standards

Route Type	Bus Type	Peak Load Standard	Off-Peak Load Standard
Core Local	Standard 40' Bus	48	38
	Articulated 60' Bus	71	57
Supporting Local	Standard 40' Bus	48	38
	Articulated 60' Bus	71	57
	30' Bus	35	28
	Cutaway	21	21
Arterial BRT	Arterial BRT 40' Bus	48	38
	Arterial BRT 60' Bus	71	57
Highway BRT	Standard 40' Bus	44	38
	Articulated 60' Bus	66	57
Commuter/Express (> 4 Miles on Freeway)	Standard 40' Bus	38	38
	Articulated 60' Bus	57	57
	Coach Bus	57	57
Commuter/Express (< 4 Miles on Expressway)	Standard 40' Bus	44	38
	Articulated 60' Bus	66	57
Suburban Local	Standard 40' Bus	48	38
	Articulated 60' Bus	71	57
	30' Bus	35	28
	Cutaway	21	21
Light Rail	Light Rail Vehicle (per car)	132	132

Service Frequency

The Metro Transit measures the frequency of a route based on vehicle headway, which is defined as the average number of minutes between transit vehicles on a given route or line traveling in the same direction. A smaller headway equates to a greater level of service along a corridor. Routes serving areas of higher transit demand will tend to have smaller headways. Table 11 displays the recommended minimum headway by route type and market area.

Table 11: Headway Standards (Minimum Level of Service)

Route Type	Market Area I	Market Area II	Market Area III	Market Area IV	Market Area V
Core Local Bus	15" Peak 30" Off-peak 30" Weekend	30" Peak 60" Off-peak 60" Weekend	60" Peak 60" Off-peak 60" Weekend	NA	NA
Supporting Local Bus	30" Peak 30" Off-peak 30" Weekend	30" Peak 60" Off-peak 60" Weekend	60" Peak 60" Off-peak 60" Weekend	NA	NA
Suburban Local Bus	NA	30" Peak 60" Off-peak 60" Weekend	60" Peak 60" Off-peak 60" Weekend	NA	NA
Arterial BRT	15" Peak 15" Off-peak 15" Weekend	15" Peak 15" Off-peak 15" Weekend	15" Peak 15" Off-peak 15" Weekend	NA	NA
Highway BRT	15" Peak 15" Off-peak 15" Weekend	15" Peak 15" Off-peak 15" Weekend	15" Peak 15" Off-peak 15" Weekend	NA	NA
Light Rail	15" Peak 15" Off-peak 15" Weekend	15" Peak 15" Off-peak 15" Weekend	15" Peak 15" Off-peak 15" Weekend	NA	NA
Commuter Express Bus	30" Peak	30" Peak	3 Trips each peak	3 Trips each peak	NA
Commuter Rail	NA	NA	30" Peak	30" Peak	30" Peak

On-Time Performance

Standards for on-time performance are established and monitored by Metro Transit’s Service Development department. On-time performance data are continuously collected using automated vehicle locator (AVL) equipment aboard vehicles. The supervisory control and data acquisition (SCADA) system is the source of on-time performance data for LRT service.

Each mode has a unique definition for what is considered “on-time.” The definitions are as follows:

- **Bus service** is considered on-time if it arrives at scheduled timepoints between 1 minute early and 5 minutes late.
- **LRT and Commuter Rail** service is considered on-time if it arrives at stations between 1 minute early and 4 minutes late.

Metro Transit’s on-time performance goal for each service mode is updated quarterly to account for seasonal factors and specific construction activity. For reference, the most recent Service Monitoring Evaluation, completed in late 2018, found that about 85 percent, 81 percent, and 89 percent of trips were on time for bus, LRT, and commuter rail service, respectively, on average.

Service Availability

The Metro Transit evaluates service availability using three separate standards: route spacing, stop spacing, and availability of service meeting the midday headway standards.

Route Spacing

Route spacing refers to the distance between two parallel routes. Route spacing guidelines seek to balance service coverage with route productivity and transit demand. Routes that are spaced too close together will have overlapping service areas and compete for riders, reducing the productivity of both routes. Routes spaced too far apart will lead to coverage gaps. Generally, areas with lower transit demand will have routes spaced farther apart.

Table 12 shows the route spacing guidelines by route type and market area. Commuter express bus and transitway routes (i.e., highway and arterial BRT, LRT, commuter rail) are determined according to specific transit market conditions.

Table 12: Route Spacing Standards

Route Type	Market Area I	Market Area II	Market Area III	Market Area IV	Market Area V
Core Local Bus*	½ mile	1 mile	Specific**	NA	NA
Supporting Local Bus	1 mile	1-2 miles	Specific**	NA	NA
Suburban Local Bus	N/A	2 miles	Specific**	Specific**	NA

*Local limited stop routes do not follow a route spacing guideline. They will be located in high demand corridors.

** Specific means that route structure will be adapted to the demographics, geography, and land use of specific area.

Stop Spacing

Stop spacing guidelines must balance the competing goals of providing greater access to service with faster travel speeds. More stops spaced closer together reduce walking distance and improve access to transit but tend to increase travel time. In general, the average distance people are willing to walk to access transit services is ¼ mile for local bus service and ½ mile for limited stop bus service and transitway service. Table 13 shows the recommended stop spacing guidelines that seek to balance speed and access. An allowable exception to standards may be central business districts and major traffic generators. These guidelines are goals, not a minimum or maximum.

Table 13: Stop Spacing Standards

Route Type	Typical Stop Spacing
Core Local Bus*	1/8 to 1/4 Mile
Supporting Local Bus	1/8 to 1/4 Mile
Suburban Local Bus	1/8 to 1/2 Mile
Arterial BRT	1/4 to 1/2 Mile
Highway BRT	1/2 to 2 Miles
Light Rail	1/2 to 1 Mile
Commuter Express Bus	Market Specific**
Commuter Rail	5 to 7 miles

*Local routes with limited stop service will have a typical stop spacing of ¼ to ½ mile

** In downtowns and local pickup areas, stop spacing will follow the standards for local routes. Along limited stop or non-stop portions of the route stop spacing will be much greater.

Midday Service Availability

In addition to the route and stop spacing standards, Metro Transit reviews service availability based on the presence of transit service that meets the required vehicle headway during the midday off-peak period. These off-peak standards are listed in Table 14, and apply to transit market areas I, II, and III.

Metro Transit maintains this standard as another means to ensure that service during the off-peak period is distributed equitably between minority and non-minority populations and between low-income and non-low-income populations.

Table 14: Off-Peak Headway Standards

Route Type	Market Area I	Market Area II	Market Area III	Market Area IV	Market Area V
Core Local Bus	30"	60"	60"	NA	NA
Supporting Local Bus	30"	60"	60"	NA	NA
Suburban Local Bus	NA	60"	60"	NA	NA
Arterial BRT	15"	15"	15"	NA	NA
Highway BRT	15"	15"	15"	NA	NA
Light Rail	15"	15"	15"	NA	NA
Commuter Express Bus	NA	NA	NA	NA	NA
Commuter Rail	NA	NA	NA	NA	NA

Distribution of Amenities

Metro Transit offers a range of features at customer facilities to improve the customer experience. Features include those that address pedestrian connections and accessibility, offer customer information in static and real-time signage, shelter, shelter light and heat, trash and recycling receptacles, and seating, among others. With limited resources for improving the thousands of bus stops and customer facilities in the service area, Metro Transit must prioritize the locations where investments are made and the types of facilities it can install and maintain across the system.

Amenities at Transit Stops

Metro Transit has developed standards for the distribution of customer information, seating, shelter, shelter light and heat, and trash receptacles at the stops it serves, including METRO (LRT, BRT) and Commuter Rail stations, transit centers, and bus stops. These standards are summarized in Table 15.

Metro Transit provides service information to its customers through a variety of means, including route maps and descriptions, detailed timetables, and real-time arrival signs, depending on the type of stop, ridership, and availability of space and/or utility connection. All stops served by Metro Transit include signage identifying the pick-up location, a listing of the routes serving that stop, and instructions on how to use NexTrip, Metro Transit's real-time departure feature this is available online, via mobile application, telephone, or text message.

Sheltered waiting places for Metro Transit customers come in many forms, including an interior waiting space or alcove integrated into a building, a park-and-ride with a sheltered waiting area, a transit center building, a shelter at a rail or BRT station, or a shelter at a bus stop. Shelters provide a package of features for transit customers, including weather protection, detailed schedules, seating, and sometimes lighting and radiant heaters. Shelters further create an identifiable waiting place for transit

customers. Shelters are typically provided by Metro Transit, though sometimes by local government or property owners.

Table 15: Customer Amenities at Transit Stops

Amenity	Types of Transit Stops		
	METRO (LRT, BRT) & Commuter Rail Stations*	Transit Centers	Bus Stops
Route Description/Map	Standard feature	Standard feature	Standard feature at bus stops with 10+ daily boardings
Detailed Timetable**	Standard feature	Standard feature	Standard feature in all Metro Transit-owned shelters
Real-Time Arrival Sign	Standard feature	Optional feature	Optional feature
Seating	Standard feature	Standard feature	Standard feature in all Metro Transit-owned shelters (benches may also be provided by others)
Shelter	Standard feature	Standard feature	Optional feature, prioritized for bus stops with 30+ daily boardings
Light	Standard feature	Standard feature	Optional feature, prioritized for bus stops with high boardings during dark hours
Heat	Standard feature	Standard feature	Optional feature, prioritized for bus stops with 100+ daily boardings
Trash Receptacles	Standard feature	Standard feature	Not provided at transit stop by Metro Transit (may be provided by others)

*Some arterial BRT stations, namely those near the end of the line with mostly people alighting the bus, not boarding the bus, may not have shelters or features typically provided in shelters, such as heat, route description/map, or detailed timetable.

**Timetables will be considered at bus stops that meet the shelter placement boarding warrants but where a shelter is not installed due to space constraints or other limitations.

Metro Transit predominantly uses ridership when determining where to place shelters and shelter lighting and heaters. Further, priority locations include areas where more households do not have cars and near hospitals, healthcare clinics, social service providers, housing for people with disabilities or older adults, and major transit transfer points. Metro Transit uses the following to prioritize the addition of new shelters:

- Highest priority: 100+ daily boardings and priority location
- High priority: 100+ daily boardings
- Medium priority: 30+ daily boardings and priority location
- Lower priority: 30+ daily boardings

Existing shelters at stops with at least 15 daily boardings are considered for replacement; shelters at stops with fewer than 15 daily boardings are eligible for removal.

Vehicle Assignment

The Metropolitan Council adopted *Fleet Management Procedures* in 2012. These procedures are designed to facilitate compliance with FTA and Title VI standards, assure that vehicles purchased meet

minimum standards, and create efficiencies and improve flexibility in the deployment/reassignment of vehicles to the extent feasible. In select situations, a specific bus type or size is assigned to a route or geographic area.

Metro Transit has five bus garages, along with two light rail and one commuter rail depots. Many routes are operated out of multiple garages and serve a large geographic area. For MTS contracted fixed routes, the Metropolitan Council owns the buses and leases them to the operating contractor under a master vehicle lease.

Vehicle Types

Metro Transit's primary vehicle type for fixed route bus service is a low-floor, 40-foot bus. The following is a summary of the other vehicle types used by the Metropolitan Council's fixed route bus fleet, which includes vehicles operated by Metro Transit as well as vehicles operated by providers under contract to the Metropolitan Council through MTS.

Commuter Coach Buses

Coach buses may be used on express trips carrying riders on a one-way trip length of 15 miles or longer and duration of more than 30 minutes. Although coach buses are lift-equipped, an effort is made to avoid using them on trips with regular wheelchair users due to the narrow aisle configuration and length of time it takes to deploy the lift. Coach buses are assigned to specific blocks based on ridership patterns and trip distance. Recently, coach buses are used on some trips on Routes 275, 288, 294, 351, 355, 365, 375, 467, 860, and 865.

Hybrid Buses

Through agreement with the City of Minneapolis, all routes operating on Nicollet Mall in downtown Minneapolis must use hybrid buses. This includes Routes 10, 11, 17, 18, 25, and 59. Hybrid buses are also assigned to Routes 63, 64, and 68 operating in Saint Paul.

Articulated Buses

Articulated buses are used primarily on express routes during the peak period; however, they are also used on local routes with heavy ridership during off-peak times. Articulated buses are assigned to specific blocks based on ridership patterns and maximum loads. Assignments are reviewed at least once each quarter.

Small Buses

Buses that are 30 feet or smaller are sometimes used by contractors to provide service on lower-ridership routes.

BRT Buses

BRT buses are specially marked buses that help brand BRT routes. They are used exclusively on the METRO A and Red Lines. METRO A Line buses have no farebox. BRT buses have fewer seats to allow for better passenger circulation.

Articulated BRT Buses

Currently, the METRO C Line is the only route using articulated BRT buses. METRO C Line buses have no farebox. All BRT buses are specially marked to help brand BRT routes; they have fewer seats to allow for better passenger circulation. These buses are assigned only to the METRO C Line due to the characteristics noted above and the location of on-route charging infrastructure at the Brooklyn Center Transit Center.

Electric Articulated BRT Buses

Currently, the METRO C Line is the only route using electric articulated BRT buses. METRO C Line buses have no farebox. All BRT buses are specially marked to help brand BRT routes; they have fewer seats to allow for better passenger circulation.

Guidelines for Assigning Vehicle to Garages

Metro Transit's Bus Maintenance department has developed guidelines for assigning vehicles to garages. When service needs require adjustment of the fleet between one service garage and another, or when new vehicles are added to the fleet, the following items need to be considered:

1. Garage capacity and characteristics
2. Spare factor
3. Vehicle type: 40-foot or Articulated, based on ridership as assigned by Service Development
4. Average fleet age: A fair and balanced average fleet age will be maintained throughout all garages. This ensures knowledge of new technology will be broadly distributed to all mechanics and helps keep both Operators and Mechanics system-wide sharing the benefits of new equipment.
5. Sub-fleets: A particular vehicle design or configuration should be kept together whenever possible
6. Stability: A bus is kept at the same garage its entire service life, if possible, to provide ownership and accountability to the garage.
7. Sequential numbers: Sequentially numbered groups of buses are kept together whenever possible to ease administrative tracking
8. Propulsion: Electric buses are currently assigned to Heywood Garage because this garage is equipped with charging infrastructure

Private Provider Fleet Management

MTS assigns vehicles to a specific contracted provider garage as part of the contract; those buses normally do not transfer to another provider during the life of the contract. If a new provider is awarded a service contract, the buses follow the service. Buses are moved from one contract to another only occasionally as routes are added or terminated, vehicle issues arise, etc. Council-owned, contractor-operated vehicles are used for Metro Mobility, Transit Link, MTS contracted fixed routes.

The contractor can assign any bus to any route as long as it is the correct size and type of bus. As a matter of practice, private providers prefer to assign the same vehicle to the same operator on a regular basis to track vehicle maintenance and condition concerns. However, because not all buses are equipped with APCs, MTS stipulates within the operating contract that vehicles must be rotated among operators and work pieces to ensure APC coverage throughout the service.

Title VI Evaluation

Bus age is used as the standard measure for determining equitable vehicle assignment. The average age of vehicles assigned to predominantly minority and/or low-income routes should be approximately equal to the average age of vehicles assigned to non-minority and/or non-low-income routes.

Service Monitoring Evaluation

The most recent Service Monitoring Evaluation was completed in October 2018. Each of the service standards and policies described in the preceding section were evaluated to ensure an equitable distribution of service between minority and low-income populations and between low-income and non-low-income populations. The complete Service Monitoring Evaluation report is included in Attachment H. Results of the individual evaluations are summarized in Table 16.

The most recent Service Monitoring Evaluation revealed potential for disparate impact and disproportionate burden relative to the distribution of bus shelter amenities, specifically, shelter heat. No potential for disparate impacts to minority populations or disproportionate burden to low-income populations is identified for the distribution of shelters or shelter lighting.

Table 16: Service Monitoring Summary

Standard/Policy	Minority Results	Low-Income Results
Vehicle Load	No Disparate Impacts	No Disproportionate Burdens
Vehicle Headway	No Disparate Impacts	No Disproportionate Burdens
On-Time Performance	No Disparate Impacts	No Disproportionate Burdens
Service Availability: Route Spacing	No Disparate Impacts	No Disproportionate Burdens
Service Availability: Midday Service	No Disparate Impacts	No Disproportionate Burdens
Service Availability: Stop/Station Spacing	No Disparate Impacts	No Disproportionate Burdens
Transit Amenities: Bus Shelter Amenities	Potential Disparate Impacts Identified	Potential Disproportionate Burdens Identified
Transit Amenities: Customer Information	No Disparate Impacts	No Disproportionate Burdens
Transit Amenities: Transit Facilities	No Disparate Impacts	No Disproportionate Burdens
Vehicle Assignment	No Disparate Impacts	No Disproportionate Burdens

Additional Analysis of Potential Disparate Impacts and Disproportionate Burdens

A further review of the distribution of shelter heat across Metro Transit's system helps to highlight the causes of the results shown above. Table 17 summarizes the results of the heater distribution analysis, including a breakdown by stop category. When considered in the aggregate, the distribution of shelter heat seems to result in potential for disparate impacts and potential for disproportionate burdens. However, the results differ when considered by bus stop type. Shelter heat is provided at three types of stops:

- Bus stops on the downtown Minneapolis express route corridor on Marquette and 2nd Avenues (MARQ2)
- Bus stops served by BRT routes
- All other bus stops

The MARQ2 and BRT routes represent a significant investment in transit infrastructure for the region. Bus stops in each of these categories are held to a higher standard of transit service and transit amenities, including the implementation of shelters with heaters. Out of the 119 heaters distributed

across the system, the bus stops along MARQ2 and the BRT routes account for 68 heaters (57 percent).⁴

When assessed independently by bus stop type, each of the resulting comparison indices meet the four-fifths threshold, signifying no potential for adverse impacts (Table 17). However, calculated regardless of bus stop type, the resulting comparison indices are substantially lower, indicating potential for adverse impact. This change in the result is partially due to the nature of the Title VI Circular requirements which states that routes need to be categorized entirely as either minority or non-minority, and as either low-income, or non-low income. For example, even though they serve a variety of demographic areas, all the BRT service stops are categorized as predominantly non-minority. This has a substantial impact on the results.

Table 17: Heater Distribution of Bus Stop Category

Bus Stop Category	Minority Stops	Non-Minority Stops	Comparison Index	Low-Income Stops	Non-Low-Income Stops	Comparison Index
All Heaters (At Warranted Stops)	18.1%	54.7%	0.33	22.1%	54.0%	0.41
MARQ2 Stops	100%	92.0%	1.09	100%	92.9%	1.08
BRT Stops	NA	100%	-	100%	NA	-
All Other Stops	14.6%	8.6%	1.70	14.6%	4.5%	3.21
All Heaters (At Unwarranted Stops)	2.9%	15.6%	0.18	6.2%	3.0%	2.07
MARQ2 Stops	NA	NA	-	NA	NA	-
BRT Stops	NA	100%	-	100%	NA	-
All Other Stops	2.9%	2.3%	1.27	2.7%	3.0%	0.90

Metro Transit’s BRT service at the time of analysis consisted of two routes: METRO Red Line BRT and METRO A Line BRT. The METRO C Line BRT has since opened, and three additional arterial BRT corridors are currently being planned for implementation throughout the system (the METRO B, D, and E Lines). Nearly all these planned routes would be implemented in areas that are predominantly minority or predominantly low-income. It is anticipated that the implementation of these lines will help to address the findings of potential disparate impact and disproportionate burden noted in the assessment. Metro Transit will continue to monitor the impact of these additional routes and will also continue to monitor the implementation of heaters to ensure Title VI compliance.

Additionally, the MARQ2 corridor improvements completed in 2009 consolidated and improved service for many express bus routes entering and departing downtown Minneapolis. Because express routes are typically characterized as serving predominantly non-minority and non-low-income areas, nearly all the MARQ2 bus stops are categorized as such, contributing to the higher rates of distribution overall for heaters at non-minority and non-low-income bus stops. The MARQ2 corridor improvements were part of a major federal and state Urban Partnership Agreement including a series of transportation projects to improvement traffic conditions and reduce congestion on I-35W, MN Highway 77/Cedar Avenue, and downtown Minneapolis. The project has seen benefits in terms of service speed and quality and has also improved the reliability of service to connecting routes throughout the rest of the system.

⁴ As of fall 2017

Finally, the Nicollet Mall shelters, all of which include heat and light, were opened in early 2018 and therefore were not included in the heater distribution analysis. These stops are categorized as predominantly minority and predominantly low-income and will be included in the next Monitoring Study analysis.

PART 3: MPO REQUIREMENTS

As the MPO for the Twin Cities region, the Metropolitan Council’s planning area encompasses the seven-county area, plus portions of Wright and Sherburne Counties. Although the portions of Sherburne and Wright counties are not otherwise part of the Metropolitan Council’s jurisdiction, they were included in the metropolitan planning area for the MPO after the 2010 Census identified areas within these two counties – primarily along I-94 and US Highway 10 – that had become part of the contiguous metropolitan urbanized area.

An MPO is a transportation policy-making organization that ensures both existing and future expenditures for transportation projects and programs are based on a comprehensive, cooperative, and continuing process, known as the “3-C” process. A region’s MPO is charged with long-range transportation system planning for all modes and the programming of short-term federal transportation funds, a program known locally as the Regional Solicitation. The Council’s 17-member policy board is the designated MPO decision-making board; it works closely with the Transportation Advisory Board (TAB) for the purposes of allocating federal funds through the Regional Solicitation process. The TAB serves as an advisory board to the Council for transportation planning purposes. It consists of 34 members who are local officials, as required by state law. Table 2 depicts the racial composition of the Transportation Advisory Board and its Technical Advisory Committee.

Planning Area Demographics

Figure 21 displays the share of minority population by census tract within the MPO planning area. Nearly 800,000 (25.8 percent) of the approximately 3,100,000 people in the MPO planning area identify as either non-white or Hispanic or Latino (i.e., minority). The minority population in the MPO planning area is greatest in eastern Hennepin County and southern Ramsey County, including portions of Minneapolis, Saint Paul, Brooklyn Park, Brooklyn Center, and Richfield. However, as depicted on the map, areas with large minority populations exist throughout the region (Figure 21).

Low-income populations by census tract within the MPO planning area are shown in Figure 22. In the aggregate, 9.7 percent of the MPO planning area population are considered low-income.⁵ The highest concentration of low-income individuals in the planning area are in portions of eastern Hennepin County and southern Ramsey County, where the rate is greater than 30 percent.

⁵ FTA Circular 4702.1B defines a low-income person as one whose household income is at or below the poverty guidelines set by HHS. These poverty guidelines are based on household size and the number of related children less than 18 years of age. However, FTA allows for low-income populations to be defined using other established thresholds that are at least as inclusive as those developed by HHS. Correspondingly, in its Title VI Program and analyses, Metro Transit and the Metropolitan Council use U.S. Census Bureau poverty thresholds, a more sophisticated measure of poverty that considers not only family size and the number of related children present, but also, for one- and two-person family units, whether elderly or not.

Figure 21: Minority Population within the MPO Planning Area

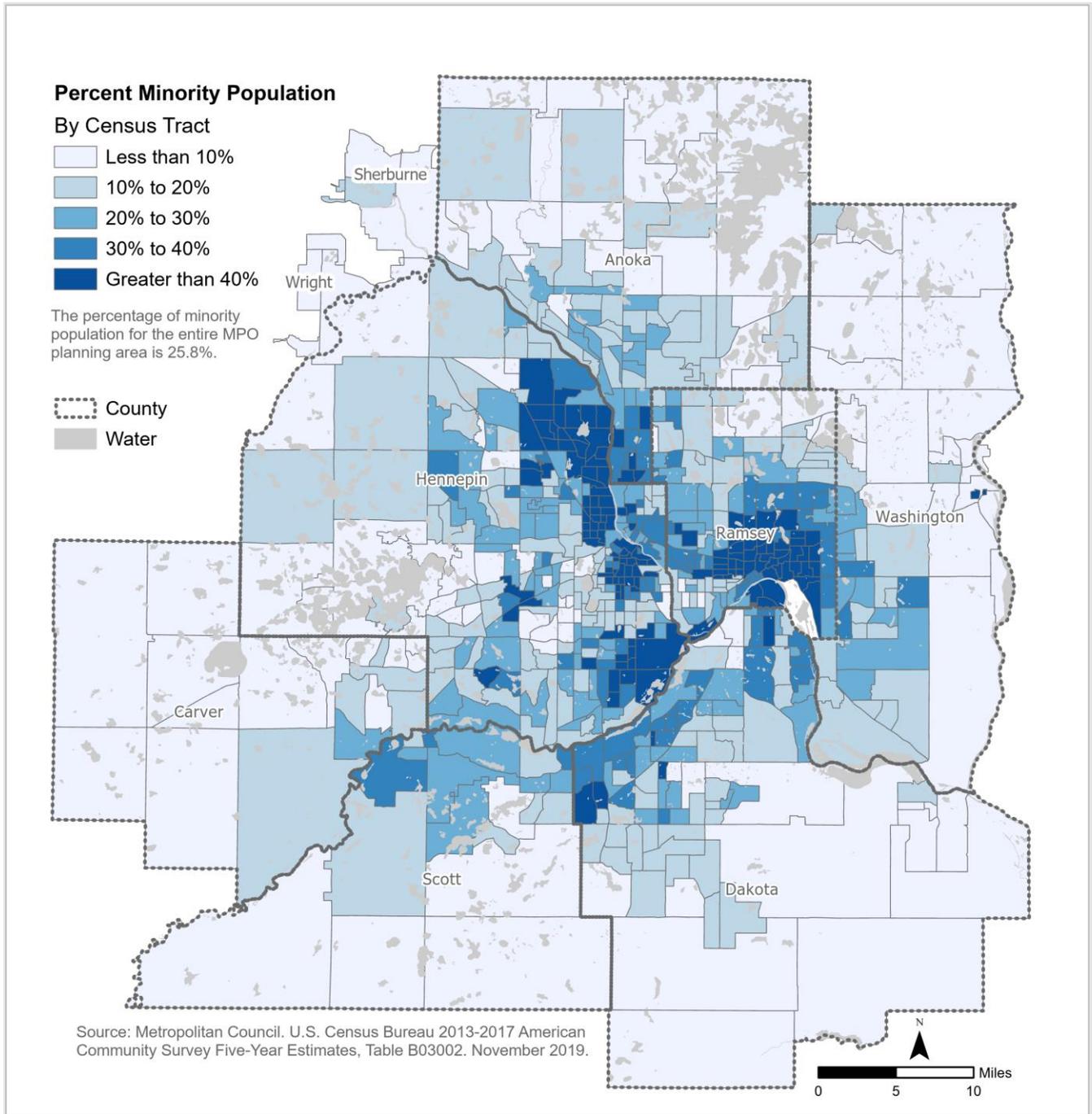
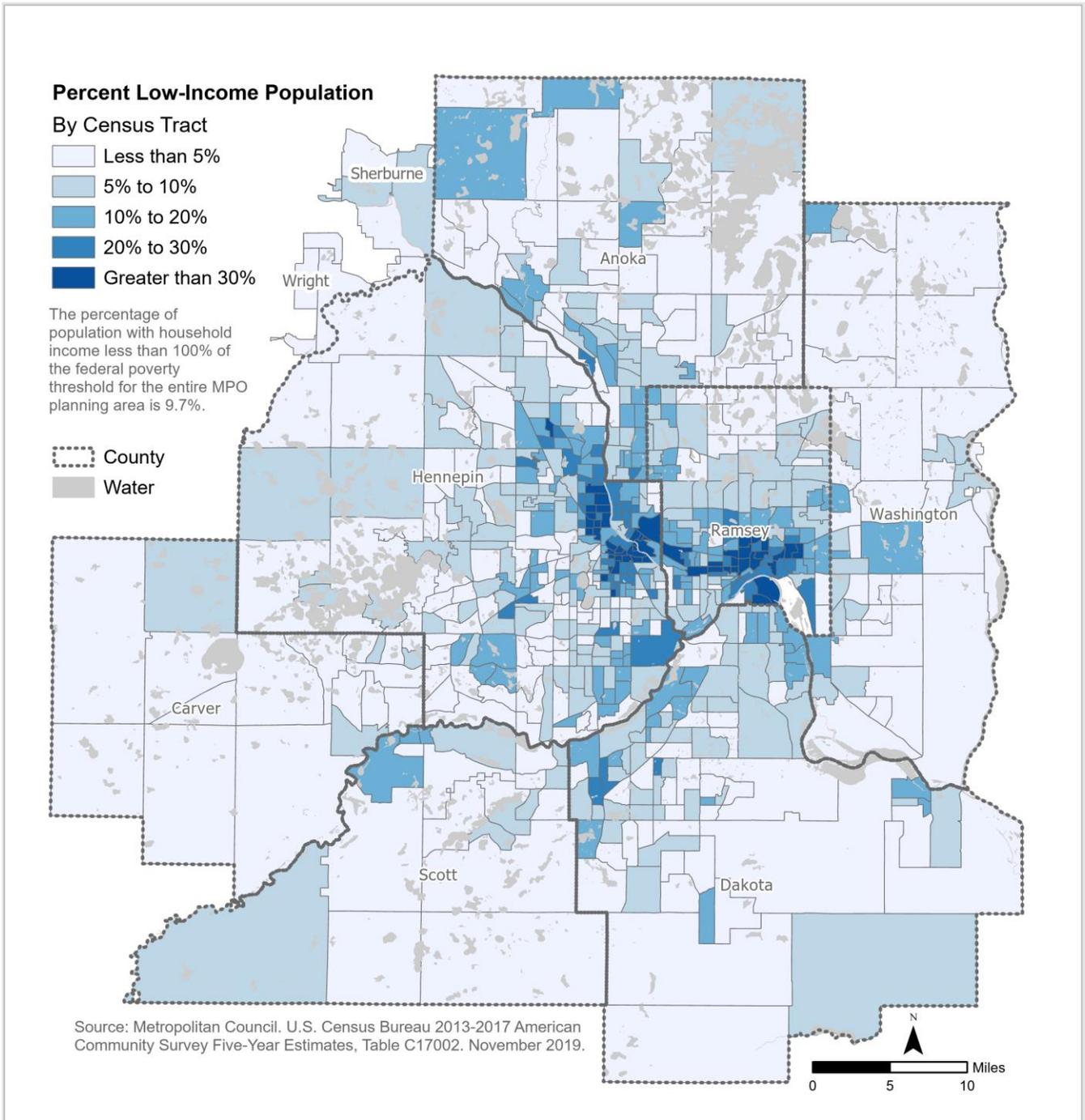


Figure 22: Low-Income Population within the MPO Planning Area



Incorporation of Title VI Principles in Regional Planning

Many of the strategies used by the Metropolitan Council to ensure the incorporation of Title VI principles in regional planning are documented in Chapter 10 of the Transportation Policy Plan. The Transportation Policy Plan addresses Title VI and Environmental Justice in part by providing a location analysis of low-income and minority populations in relation to the planned investments in the metropolitan transportation system. This analysis includes a discussion of whether disproportionate

impacts were identified, the extent and magnitude of those impacts, and how the impacts can best be avoided or mitigated.

The Metropolitan Council's Transportation Public Participation Plan (Attachment D) also includes a detailed discussion of the public participation process, including the methods employed to involve traditionally under-served populations including minority, low-income, and LEP populations. This process ensures that members of these communities are provided with opportunities to participate in the transportation planning process, including the development of the Transportation Policy Plan.

As the MPO for the region, the Council approves federal funding through a process known as Regional Solicitation. The Regional Solicitation includes criteria that directly addresses equity in the scoring of transportation projects, with projects scored more favorably for providing benefits to people of color, low income, disabled, elderly, and youth populations. Doing so further solidifies the Council's role in assuring that transportation investments do not result in disparate impact or disproportionate burden to minorities and low-income residents, respectively.

Distribution of State and Federal Funds

The Metropolitan Council, as the MPO, manages a program that provides federal funding to support public transportation in the Twin Cities area and is responsible for managing federally funded transit projects in accordance with federal requirements. The Title VI Circular requires that recipients:

analyze the impacts of the distribution of state and federal funds in the aggregate for public transportation purposes, including Federal funds managed by the MPO as a designated recipient

The distribution of state and federal funds in the aggregate for public transportation purposes within the MPO planning area was analyzed using funding levels for transit projects included in the Metropolitan Council's 2020-2023 TIP (Figure 23). The source of funds allocated to these projects include FTA Sections 5307 and 5339 formula funds, FTA Sections 5337 and 5309 discretionary funds, and Federal Highway Administration (FHWA) Congestion Mitigation and Air Quality (CMAQ) and Surface Transportation Block Grant (STBG) program funds. More information about the sources and uses of these funds is available in the Council's 2020-2023 TIP, available online at [https://metrocouncil.org/Transportation/Planning-2/Key-Transportation-Planning-Documents/Transportation-Improvement-Plan-\(TIP\).aspx](https://metrocouncil.org/Transportation/Planning-2/Key-Transportation-Planning-Documents/Transportation-Improvement-Plan-(TIP).aspx).

The analysis used projects for which a project service area could be defined. For example, an LRT project's service area was defined as ½ mile around the proposed alignment; improvements to a local bus corridor were assigned a ¼ mile service area. Certain projects, like the purchase of buses, do not have a specific geographic service area, and are thus excluded from this analysis.

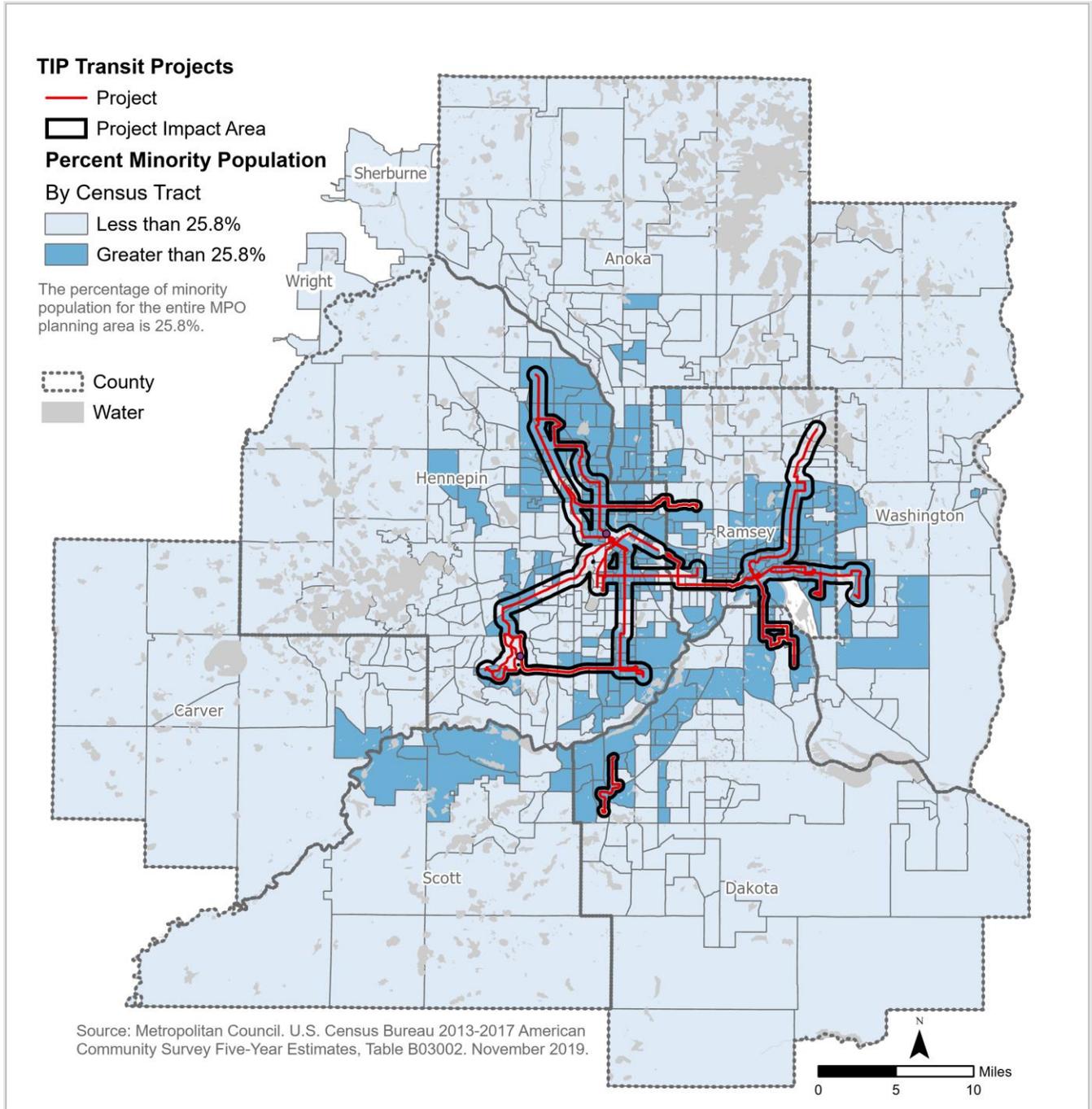
Where applicable, each public transportation project in the 2020-2023 TIP was assigned a service area, which was overlaid on census tracts. Many census tracts in the MPO planning area are not impacted by any transit projects, while many are impacted by multiple projects. The funding amounts associated with 2020-2023 TIP public transportation projects were then summed for each census tract.

Each census tract was defined as predominantly minority or predominantly non-minority; predominantly minority census tracts are those with minority population greater than the MPO planning area average, which is 25.8 percent. To assess the potential for disparate impacts to minority populations, the average amount of project funding impacting predominantly minority census tracts was compared to

that of predominantly non-minority census tracts, and the Metropolitan Council’s disparate impact policy (using the “four-fifths” threshold) was applied.

The Council’s disparate impact policy states that benefits provided to minority populations be at a rate at least 80 percent (four-fifths) of the benefits being provided to non-minority populations; failure to meet this threshold is evidence for potential disparate impact to minority populations.

Figure 23: 2020-2023 TIP Projects and Percent Minority Population



Results

Results of the funding distribution analysis are displayed in Table 18 and Table 19. There are 712 census tracts in the MPO planning area; on average, they receive approximately \$82.4 million of project funding from 2020-2023 TIP transit projects (Table 18). Within the MPO planning area, there are 284 predominantly minority tracts; on average, they had \$140.5 million in funding investment – three times greater than predominantly non-minority tracts (\$43.5 million).

The ratio between predominantly minority tracts and predominantly non-minority tracts in terms of average cumulative project funding is 3.23; this is well above the four-fifths threshold of 0.8 that the Metropolitan Council considers as an indication of potential for disparate impact. Thus, this analysis finds the distribution of state and federal funding for public transportation purposes does not result in disparate impacts to minority populations.

Table 18: 2020-2023 TIP Funding Distribution by Predominantly Minority and Non-Minority Areas (MPO-wide)

Census Tracts in MPO Planning Area	Average Cumulative Project Funding	Comparison Index
All Tracts (n=712)	\$82,406,092	
Predominantly Minority (n=284)	\$140,541,211	3.23
Predominantly Non-Minority (n=428)	\$43,490,476	

Not all census tracts in the MPO planning area are served by transit. With this in mind, the analysis was repeated to include only census tracts impacted by projects receiving funding for public transportation purposes (263 tracts, 37 percent of MPO planning area tracts), based on the 2020-2023 TIP.

On average, predominantly minority tracts impacted by a 2020-2023 TIP transit project received approximately \$228 million, while predominantly non-minority tracts received \$213 million (Table 19). The resulting funding ratio of 1.07 is above the four-fifths threshold of 0.8. As in the first analysis, the results suggest no disparate impact to minority populations from the distribution of state and federal funding for public transportation purposes.

Table 19: 2020-2023 TIP Funding Distribution by Predominantly Minority and Non-Minority Areas (Project Areas)

Census Tracts in MPO Planning Area with Projects	Average Cumulative Project Funding	Comparison Index
All (n=263)	\$223,091,777	
Predominantly Minority (n=175)	\$228,078,308	1.07
Predominantly Non-Minority (n=88)	\$213,453,258	

Distribution of FTA Funds to Subrecipients

As the MPO of the Minneapolis-Saint Paul metropolitan area, one of the Metropolitan Council's functions is to allocate formula funding to subrecipients and/or pass through competitive federal funds. Some of these funds were previously distributed to transit projects through FTA formula programs such as Job Access and Reverse Commute (JARC) and New Freedom, which have now expired. The Metropolitan Council, through the TAB, continues to allocate CMAQ and STBG funds through a competitive process known as Regional Solicitation. Since 2014, the Regional Solicitation process has included measures to address socioeconomic equity. Applicants are asked to identify the project's positive benefits and negative impacts (and relevant mitigation) for low-income populations, people of color, children, people with disabilities, and the elderly.

The Metropolitan Council takes care to distribute these federal funds equitably with regard to minority and income status. Projects in predominately minority areas can incur bonus points for providing engagement and other positive benefits. Figure 23 includes projects receiving funds through the Regional Solicitation process.

More information about the Council's Regional Solicitation process is available online at <https://metro council.org/Transportation/Planning-2/Transportation-Funding/Regional-Solicitation-NEW.aspx?source=child>.

ATTACHMENT A: TITLE VI NOTICES

**ATTACHMENT B: TITLE VI COMPLAINT
FORM**



Metropolitan Council
Office of Equal Opportunity
390 Robert Street North
St. Paul, Minnesota 5510

TITLE VI DISCRIMINATION COMPLAINT FORM

Section 1: Complainant Information

First Name:

Last Name:

Street Address:

City:

State:

Zip Code:

Primary Phone #:

Other Phone #:

E-mail Address:

Section 2: Third Party Information

Are you filing this complaint on your own behalf?

No

Yes (if yes, go to Section 3)

First Name of Person Filing Complaint:

Last Name of Person Filing Complaint:

What is your relationship to the complainant?

Primary Phone #:

Other Phone #:

E-mail Address:

Please explain why you have filed for the third party:

Section 3: Complaint Information

I believe the discrimination I experienced was based on (check all that apply)

Race

Color

National Origin

Other, please specify

On what date did the alleged discrimination take place?

Where did the alleged discrimination take place?

Please explain and clearly as possible what happened and how you believe your were discriminated against. Indicate who was involved. Be sure to include how you feel other persons were treated differently than you and why you believe these events occurred.

List the names and contact information of persons who may have knowledge of the alleged discrimination.

Witness 1

First Name:

Last Name:

Primary Phone #:

Other Phone #:

E-mail Address:

Witness 2

First Name:

Last Name:

Primary Phone #:

Other Phone #:

E-mail Address:

Section 4: Other Agency/Court Information

Have you filed this complaint with any other federal, state or local agency or with any federal or state court?

No (if no, go to Section 5)

Yes

If Yes, Check all that apply.

Federal Agency

Federal Court

State Agency

State Court

Local Agency

Please provide information about a contact person at the agency or court where the complaint was filed.

Name of Agency:

Date complaint was filed:

First Name:

Last Name:

Street Address:

City:

State:

Zip Code:

Primary Phone #:

Section 5: Resolution

How can this be resolved to your satisfaction?

Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.

This Discrimination Complaint form or your written complaint statement must be signed and dated in order to address your allegation(s). Additionally, this office will need your consent to disclose your name, if necessary, in the course of our inquiry. The Discrimination Complaint Consent/Release form is attached for your convenience. If you are filing a complaint of discrimination on behalf of another person, our office will also need this person's consent to disclose his/her name.

I certify that to the best of my knowledge the information I have provided is accurate and the events and circumstances are as I have described them. As a complainant, I also understand that if I indicated I will be assisted by an advisor on this form, my signature below authorizes the named individual to receive copies of relevant correspondence regarding the complaint and to accompany me during the investigation.

Complainant Signature

Date

ATTACHMENT C: PUBLIC ENGAGEMENT PLAN

Metropolitan Council Public Engagement Plan

Partnering with people to make regional decisions, fostering engagement

The Twin Cities metropolitan area is a thriving region of nearly 3 million people living in a wide range of communities – from open, undeveloped spaces to growing suburban communities and lively dense cities at its core. Together, these communities have emerged as a world-class metropolitan area – a great place to live, work and do business.

At the heart of this thriving region are planning discussions and decisions that guide how our region's communities grow – the people who will live and work here now and in the future. Our region is currently undergoing a transformative process that will result in an increasingly diverse population – by 2040, about 40% of the population will be people of color.

These regional planning decisions must be rooted in the needs of the people. As the designated planning entity for the Twin Cities region, the Metropolitan Council has elevated and called out the need for including the full range of voices at the table. This Public Engagement Plan provides the vision and the process for engaging the full range of community constituents in regional decision-making.

Introduction – A New Approach to Engagement

The Twin Cities region is made up of seven-counties – Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, and Washington counties – includes 186 local cities, as well as several unincorporated townships in the more rural parts of the region. The Metropolitan Council creates and implements the long-range development guide for the region, called *Thrive MSP 2040* (last approved in May 2014). This guide is updated every 10 years and several policy and systems plans result from it, including the *Transportation Policy Plan*, *Regional Parks Policy Plan*, *Water Resources Policy Plan*, and *Housing Policy Plan*. In addition to these important policy and system plans, *Thrive MSP 2040* also calls for an enriched *Public Engagement Plan* that serves as a guide on how to approach the public planning process for all Metropolitan Council activities.

Often, when people think about planning, they focus on the things: buildings, streets, green space, roads, and transit. But planning is really about people, about the communities we call home. It is about where we work, where our families will grow, and hopefully, where they'll prosper, and where we'll connect with one another.

The goal of this *Metropolitan Council Public Engagement Plan* is to make a shift in the planning process from thinking about traditional outreach and participation processes to an engagement model that fosters shared problem solving, supportive partnerships and reciprocal relationships. To truly foster that kind of collaboration equitably, the Metropolitan Council has asserted the need to engage the diverse range of community interests in the process to plan for our communities and in structuring engagement related to those decision-making processes. The region needs the full range of voices at the table to understand issues, explore alternatives, and create a shared action plan to address issues.

Included in this plan is helpful background information on the Metropolitan Council, *Thrive MSP 2040*, the process of putting this plan together, and definitions of terminology used throughout. It will also highlight the guiding principles of engagement and lay out the new strategic approach to public engagement called for in *Thrive MSP 2040*. Throughout this document you will also find links to additional helpful information.

Background Information about Regional Planning

The Metropolitan Council

The Metropolitan Council was created by the Minnesota Legislature and Governor Harold LeVander in 1967. Ever since, the Metropolitan Council has played a key role in coordinating regional growth and planning for the Twin Cities Metropolitan area. There are 17 members of the Council – 16 members that are appointed to represent geographic districts and a chair appointed at-large. The members are appointed by the governor and serve terms of up to four years that align with the term of the governor. Members may serve multiple terms.

The Council provides the following services for the seven-county Twin Cities metropolitan region:

- **Plans for Future Growth of the Region:** The Council plans for future growth and makes strategic, efficient public investments to support the region's high quality of life and economic competitiveness.
- **Operates Metro Transit:** Every day, Metro Transit serves bus and rail passengers with award-winning, energy-efficient fleets (nearly 85 million in 2014 or nearly 90% of all regional transit rides). These strategic investments support a growing network of bus and rail transitways, and transit-oriented development.
- **Collects and Treats Wastewater:** This region collects and treats wastewater at rates 40% lower than peer regions, while winning national awards for excellence.
- **Protects and Monitors Clean Water:** The Council works to ensure adequate clean water for the future through water supply planning and lake and river monitoring programs.
- **Develops Regional Parks and Trails:** The Council plans and develops a world-class regional parks and trails system made up of more than 50 parks and park reserves and more than 340 miles of interconnected trails.
- **Provides Affordable Housing:** The Council creates and supports affordable housing opportunities throughout the region by providing affordable housing through the Metro Housing and Redevelopment Authority (HRA) and establishing regional housing policies and planning.

Thrive MSP 2040

Under Minnesota state law, the Council is responsible for preparing a comprehensive development guide for the seven-county metropolitan area called *Thrive MSP 2040*, which provides a framework for a shared vision for the future of the region over the next 30 years. The Council is responsible for

developing *Thrive* and the plans for the three statutory regional systems—wastewater, transportation, and regional parks—as well as a housing policy plan. These system plans provide specific information to assist local governments in creating consistent, compatible, and coordinated plans that strive to achieve local visions within the regional and help ensure an efficient and cost-effective regional infrastructure.

In addition to providing the policy foundation for regional planning, *Thrive MSP 2040* also calls for greater attention to fostering equity both in policies and in engaging residents of the region. It recommends a regional public engagement strategy that assures policies are reflective of all the region’s residents and supports prosperity for all; particularly historically underrepresented populations (people of color, people with disabilities, people with lower incomes), people of all ages, and other traditionally marginalized groups.

Within *Thrive MSP 2040*, the Council is also committed to collaborating with partners in local governments, communities of faith, communities of color, service providers, schools, and other advocates to better coordinate goals and desired outcomes and engage a cross-section of the region’s population in decision making.

This commitment to equity and collaboration detailed in *Thrive MSP 2040* will require new approaches for the Council. This Public Engagement Plan will help the Council work towards greater collaboration and problem-solving with members of the broader Twin Cities communities, and work toward the principle of making decisions with people, rather than for people.

Public Engagement Plan Development

In addition to being called for in the *Thrive MSP 2040* plan, this Public Engagement Plan results from partner feedback and local lessons learned through the Corridors of Opportunity effort, as well as the good work of communities around the country. Specifically, the Community Engagement Steering Committee leadership with the support of the Community Engagement Team – both established through the Corridors of Opportunity effort – were key partners in creating this plan and the principles within it. Their work shows innovation and a commitment to engaging all communities, particularly those historically underrepresented and underresourced in the Twin Cities region.

The Council’s Director of Communications and Outreach Team Manager are responsible for managing and implementing this Public Engagement Plan, and collaborating with other outreach staff across the Council’s operating divisions to assure consistent application of the plan and its principles.

Useful Definitions

Throughout this Public Engagement Plan we talk about the need for better outreach and engagement. For the purposes of this plan, we thought it would be helpful to clearly define what each of these critical actions mean in reference to the Metropolitan Council's work.

Outreach: Outreach is quite simply "the act of reaching out" and initiating contact with individuals, groups, or institutions. Outreach activities are often *transactional* in nature, or focused on collecting public input or reaction to a specific idea or proposal. This involves identifying and reaching out to the

individuals, communities, constituencies and organizations that can help ensure a unique and authentic perspective is gathered, for the decision-making processes of the Council and for specific projects.

Engagement: Engagement is the act of intentionally organizing individuals, communities, constituencies and organizations to help the Council generate ideas, better understand issues, identify concerns and considerations, and help with problem-solving for the work they do. This organizing can be done through many different avenues such as websites, meetings, events or one-on-one conversations. In contrast to outreach, engagement is *relational and ongoing*, or multi-directional interactions. Engagement moves beyond simply identifying “who” we need to reach out to and embraces a strategic approach to building lasting relationships. This work involves creating *specific engagement plans* around a project, as well as the effort to build more ongoing communication that will help gain a *deeper community connection and understanding*, provide ongoing relevance and awareness, and help leverage community momentum and interest for the ongoing work of the Council.

During the process to create this plan, community leaders created the following statement about the power of community engagement, which feeds the principles and values articulated in this plan:

In public decision-making processes, community engagement is an intentional, strategic, purposeful process to connect and empower individuals and communities. It is multi-dimensional and flexible to meet residents of a locale or members of a broader community where they are and engage diverse and historically underrepresented communities to achieve equitable outcomes. An accessible, respectful community engagement process is proactive, culturally appropriate, inclusive, and ongoing, with both short-term and long-term impact.

True community engagement goes beyond consultation to authentically facilitate community involvement in decision-making. It recognizes the value of building relationships and leadership capacity among agencies, community organizations, and residents. It provides ongoing relevance and awareness, and helps leverage community momentum and interest.

True community engagement results from intentionally organizing individuals and communities to understand issues, identify concerns and considerations, and engage in problem-solving. It cannot strictly begin and end with one or more self-contained projects, but needs to build upon each effort by deepening community connections and understanding. While enriched by participation by individuals, it must not strictly rely on volunteer efforts or people with means and time to participate, but must be structured with the understanding that accommodations and financial support are required to deepen involvement.

Public Engagement Principles

Planning requires collaboration to create shared values and outcomes. Our region needs the full range of voices at the table to understand issues, explore alternatives, and create a shared action plan to address issues.

At the very least, this requires a shift from traditional outreach and participation processes to an engagement model that fosters shared problem solving, supportive partnerships and reciprocal

relationships. Though one entity may have the authority or budget to complete a project, success requires coordinated collaboration of a range of partners, which bring the range of perspectives and expertise to strengthen the process.

While public outreach and public participation processes encourage people to be involved in public decision-making, engagement – the process that recognizes the value of creating ongoing, long-term relationships for the benefit of the greater community – brings the interactive, collective problem-solving element into the process that capitalizes on the collective strengths of various stakeholders.

People are experts in assessing the long-term needs of their personal experiences and interactions with the places they live and work. This Public Engagement Plan recognizes people as full and equal partners in the region’s decision-making processes at all levels. Specifically, it outlines the responsibilities and commitments of the Metropolitan Council to engage the public and key constituencies in regional planning, and provides guidance for communities in the region to help establish some consistency in best practices for engagement.

The Metropolitan Council places a high priority on outreach and engagement work for regional planning and infrastructure projects. For the most part, the level of effort has been on a project by project basis and varied widely in scope. One goal for this Public Engagement Plan is to make sure there is an ongoing commitment to integrate meaningful outreach and engagement into the fabric of everyday work of the Council members and staff and make sure that the following principles are front and center when approaching their work.

1. **Equity:** The *Thrive MSP 2040* plan places new emphasis on the importance of engaging communities equitably, to intentionally engage both historically underrepresented and underresourced communities such as communities of color, cultural communities and immigrants, people with disabilities, low-income individuals, the elderly, and youth in a way that more directly addresses existing social inequalities. Equitable outcomes are shared outcomes – they reflect the values and needs of the community collectively – including the neighborhood, city, county, or broader community – as it relates to planning, whether broadly or on a specific project. These outcomes specifically address communities commonly left out of the decision-making process. Engaging equitably means approaches to problem-solving need to be flexible and accessible to people and recognize that a one-size-fits-all approach may be equal, but does not equip participants to achieve desired outcomes.
2. **Respect:** Residents and communities should feel heard and their interests included in decisions. The time and investment of all participants is valuable and it is important that community members clearly understand the tangible benefits for their participation in a project. Whenever possible and appropriate, funds should be made available to community organizations (primarily non-profit organizations) to participate and engage their constituencies.
3. **Transparency:** Planning for engagement efforts and decisions being made throughout the process should be open and widely communicated. Discussions and problem-solving should occur early in a project process and on an ongoing basis to solidify long-term relationships. Effort should be coordinated to provide sufficient context about how all the policy and systems

plans work together. All materials will be presented in plain language, and with detail appropriate to the audiences. Translation of materials and interpretation services will be provided when necessary. Some of the items participants should know upfront are timelines for decision making, who has the power to make decisions, how their input be used, and how to track project progress. In addition, participants should have the opportunity to interact with decision-makers, ask questions, and jointly wrestle with policy decisions.

4. **Relevance:** Engagement occurs early and often throughout a process to assure the work is relevant to residents and communities. Effective engagement involves preliminary consultation about the community's values related to an issue, the appropriate method and venue for engagement, and establishing expectations for ongoing communication and engagement. The experience should reflect shared learning and multi-directional problem-solving and should address issues that a locale or broader community has identified, not merely the project-specific needs of the Metropolitan Council.
5. **Accountability:** residents and communities can see how their participation affects the outcome; specific outcomes should be measured and communicated. Each project and planning effort should include an assessment of the affected communities and appropriate measures of success, inclusion, and culturally appropriate approaches and communication techniques. In addition, the Council will periodically report back to constituencies and communities regarding how these goals are being met. The Council's engagement process will also include ongoing evaluation measures that will allow the team to adjust their work to make sure expected outcomes are achieved. As always, these updates and changes need to be clearly, and widely communicated to all those involved.
6. **Collaboration:** Engagement involves developing relationships and understanding the value residents and communities bring to the process. Decisions should be made with people, not for people. The Council is committed to collaborating with partners in local governments, communities of faith, communities of color, service providers, schools, and other advocates to better coordinate goals and desired outcomes and engage a cross-section of the region's population in decision making. When appropriate, the Council will convene multiple partners to create shared plans and strategies – particularly in addressing areas of concentrated poverty and related disparities that Council investments might influence. In the process of collaboration, if community organizations are serving as experts for planning and implementing outreach strategies, they should be compensated.
7. **Inclusion:** Engagement should remove barriers to participation that have historically disengaged residents and communities. Meetings, problem-solving sessions, and other in-person interactions should be planned with advance notice to participants, and a clear understanding of what to expect at the meeting. There should be opportunities to participate at other times and in other ways. Opportunities should be promoted widely through multiple means to reach all relevant audiences. Events should be held at times and places where people naturally convene, with an opportunity to enhance community connections. When appropriate, accommodations should be made to remove barriers to participation (such as transportation, childcare or activities for children, food, etc).
8. **Cultural Competence:** Engagement should reflect and respond effectively to racial, ethnic, cultural and linguistic experiences of people and communities. Engagement efforts should

work to mitigate existing racial, ethnic, cultural or linguistic barriers and include diverse races, cultures, genders, sexual orientations, and socio-economic and disability statuses.

STRATEGIES

While this plan identifies engagement strategies that reflect commonly used practices in regional planning efforts, as well as communications and engagement practices, it is intended to put the spotlight on emerging and more robust strategies that focus on the idea that public engagement efforts strengthen planning processes and help create better results. Strategies will be considered and planned as appropriate for various efforts – some strategies will not work for certain projects or on an ongoing basis. This plan also recognizes the value of long-term relationship-building between the Council, local governments and local officials, and the community at-large.

General Strategies for Outreach

- **Conduct Engagement Planning:** A specific engagement plan will be created for each of the Council's large planning efforts to detail activities, timelines, outcomes, and evaluation processes for engagement opportunities. These activities will be planned by collaboratively setting goals and outcomes with stakeholders and will build a regular reporting plan into each effort. A central part of these plans will include the Metropolitan Council collaborating directly with the public and commonly underrepresented populations (people of color, immigrants, low-income populations, people with disabilities, the elderly, youth), as well as community advocates, and partners in regional public engagement. The Council will also create engagement plans for smaller-scale planning efforts and activities that support the organization's strategic policy and operational goals.
- **Have a Presence in the Communities:** Engagement is about building long-term, lasting relationships, and it's important for Council members and staff to be present in and connected to communities in order to build long-term relationships. This means participating in other community conversations, events, and activities, even when the Council might not have a specific role in an event or conversation. This also means planning unstructured or less formal interactions to learn from residents, local governments, communities, and other stakeholders – who are also customers.
- **Better Leveraging Existing Partnerships:** In order to deepen the level of engagement in the metropolitan region, it is important that the Council leverage partnerships that are being formed across all sectors of the work.
- **Utilize Existing Advisory Bodies:** The Council's advisory bodies provide key opportunities for engaging stakeholder participation. They should allow members, representing a cross-section of key stakeholder groups in the region, to help shape regional plans and policies. The Council appoints members of the general public, local elected officials, professionals with technical knowledge and experience, or representatives of groups, identified in state law, according to the responsibilities of particular advisory bodies. Advisory bodies may recommend studies, recommend action to the Council's standing committees, and/or provide expert advice.

- **Create Additional Strategic Consultative Groups:** The Council will appoint policymaker and technical groups to advise on the updates to Council policy plans and initiatives when appropriate. If possible, they will include business and community interests or create specific groups to address the need. There should be a specific emphasis put on recruiting people from historically underrepresented and underresourced communities. These consultative groups should have a specific role in directing the activity they are advising, such as setting meeting agendas that include an updated progress report on the project.
- **Produce Engagement Studies:** When there is an opportunity within the different advisory boards to recommend studies, they should consider including a study of engagement efforts which will help guide Council policy and system plans in the future.
- **Highlight Best Practices in the Field:** The Council's Outreach Unit, within the Communications Department, will also be tracking best practices and highlighting community engagement work on the federal, state and local levels that support the principles in this plan and expands the region's understanding of successful community engagement. The Council website will have a frequently updated page that highlights best practices for engagement, and providing links to key information and resources on engagement.
- **Provide Guidance for Local Governments:** As identified in *Thrive MSP 2040*, the Council will provide technical assistance and information resources to support local governments in advancing regional outcomes and addressing the region's complex challenges. Specifically, the Council is poised to support local governments in community engagement efforts related to its comprehensive planning processes, as well as any other efforts that affect the broader community and would benefit from engagement of the broader community.
- **Convene Regional Discussions:** As identified in *Thrive MSP 2040*, the Council and staff may convene stakeholders around the region periodically to discuss specific policy issues, regional trends or emerging challenges, or to provide an opportunity for Council members to hear from the region's residents and community leaders and get a pulse of what's happening in the communities across the metropolitan area. Another function of these sessions would be to provide members of the community with information and an opportunity to inform and influence planning processes.
- **Use Online Interactive Spaces:** The Council will use creative and easy-to-access online platforms to gather feedback and foster discussion about Council planning activities and policy plan content, as well as to hear what is going on in communities across the region.

Measuring Success

For the Council, accountability includes a commitment to monitor and evaluate the effectiveness of the policies and practices toward achieving shared outcomes and a willingness to adjust course to improve performance if needed. The Public Engagement Plan will have both qualitative and quantitative measures that will be used throughout.

The following are some of the steps that the Council will take to measure and evaluate their work around engagement on specific projects:

1. **Before the Project:** At the beginning of each project-related planning effort, Council staff will perform an assessment of groups that will be directly affected or may have an interest. For Council-wide planning efforts, that will always include a broad array of regional stakeholders. Audience assessments will specifically address groups that are historically underrepresented in planning efforts.
2. **During the Project:** Following this initial assessment, staff will consult with community organizations, and other stakeholders to confirm the audience needs and to begin planning for engagement related to the effort. This will include discussion about goals for engagement and desired outcomes.

Once goals have been established, a combination of qualitative and quantitative measures will be put into place to evaluate the success of the public engagement activities. Evaluations will take place on an ongoing basis throughout the project. Periodic evaluations will be followed by mid-project assessment to assure strategies will result in expected outcomes and staff will make necessary adjustments.

3. **Conclusion of the Project:** At the conclusion of a project, staff will first survey participants to assess the following qualitative elements:
 - Were the methods and structure of the outreach effort engaging?
 - Did they feel their time and opinions were valued?
 - Did they understand the goal of the outreach effort and their role?
 - Was their contribution reflected in the final product?
 - Would they participate in another Council outreach activity?
 - Did they hear regular updates about progress on the project?
 - Their opinions regarding the overall quality of their experience with the Council and the engagement effort.

Staff will also call together partner agencies for a meeting to debrief on the outreach efforts, including what worked, what didn't, lessons learned and what could be improved upon for future efforts. In addition, staff will survey partners who were involved in setting goals and expectations for the effort to assess whether expected outcomes were achieved.

A number of quantitative measures will also be collected at the conclusion of the project:

- Number of people that participated in public engagement activities

- Number and diversity of organizations that participated in planning efforts (self-identifying)
- Number of individuals who participated in related discussions on the Council’s website, social media platforms, and online information-gathering sites
- Percentage of county, city and township governments whose staff and/or policymakers participated in planning efforts (when relevant to the effort)
- Earned media activities that occurred related to planning efforts (and comparisons, as available, when relevant)

In addition, outreach and engagement staff will work with residents of the region and representatives from different segments of the broader Twin Cities community to monitor the ongoing performance of the engagement practices of the Council. This may include, but is not limited to, convening focus groups, conducting surveys, convening independent review boards, and one-on-one interviews. These assessments will be presented to the full Metropolitan Council during quarterly outreach and engagement updates that are established to measure progress toward Council engagement goals.

Implementation

A full implementation plan, and set of tools for Council Members and staff, will be created to support this plan, and will evolve along with this plan as new lessons are learned and best practices are captured. Among those tools is a worksheet, developed collaboratively with community members, to guide planning and engagement staff in creating strategies and planning for project engagement. The Council will use its website to highlight best practices and encourage other organizations and communities to adopt these practices.

Conclusion

The Twin Cities region is a vibrant and diverse place. It is a collection of many different communities that together form one of the nation’s largest metropolitan areas. This region’s collective success is built on a strong civic tradition of shared action by residents, government, nonprofit and philanthropic organizations, community groups, and business leaders aiming to enhance our communities and region as a whole. This shared tradition relies on an acknowledgment of each person and organization in our region as an asset and reflects a valid and important point of view. We believe that this Public Engagement Plan is a way for the Metropolitan Council to utilize all of the region’s valuable resources and to help assure we are creating shared values and aspirations for our communities.

**ATTACHMENT D: TRANSPORTATION
PUBLIC PARTICIPATION PLAN**

Metropolitan Council TRANSPORTATION PUBLIC PARTICIPATION PLAN (updated May 2017)

Introduction

Public participation is an essential element of transportation planning in the Twin Cities metropolitan region. Because the region is growing and the people are changing, public participation will need to be more coordinated and deliberate. The Metropolitan Council's public engagement framework is outlined in *Thrive MSP 2040*, the Council's Public Engagement Plan, and the Transportation Policy Plan. Together, these policy documents set the tone and give overall policy direction for public participation in transportation planning.

This Transportation Public Participation Plan establishes a framework for the region's stakeholders to influence both long-term transportation policy development and short-term transportation programming. It details the methods and strategies that the Metropolitan Council will use to engage the wide range of stakeholders, from policymakers, to business interests, to residents of the region. It also identifies specific ways those stakeholders can connect to the decision-making process for transportation in the Twin Cities region.

This plan is also responsive to the guidance provided in federal law (23 §CFR450.316).

Regional Policy Guidance

Thrive MSP 2040

With *Thrive MSP 2040*, the Council has not only laid out a foundation on how programs and services will be administered to maintain the region's growth and prosperity, but also how engagement supports this with an outcomes-based approach. Required by state law, *Thrive MSP 2040* underwent a rigorous vetting process by the public through a comprehensive public participation process. Efforts to create the regional plan engaged a broad range of stakeholders, including community organizations and advocacy groups. The result of this engagement are the five outcomes and three principles of *Thrive MSP 2040*:

5 Outcomes for the Twin Cities Region

- **Stewardship** advances the Council's longstanding mission of orderly and economical development by responsibly managing the region's natural and financial resources and making strategic investments in our region's future.

- **Prosperity** is fostered by investments in infrastructure and amenities that create regional economic competitiveness, thereby attracting and retaining successful businesses, a talented workforce, and consequently, wealth.
- **Equity** connects all residents to opportunity and creates viable housing, transportation, and recreation options for people of all races, ethnicities, incomes and abilities so that all communities share the opportunities and challenges of growth and change.
- **Livability** focuses on the quality of our residents' lives and experiences in our region, and how places and infrastructure create and enhance the quality of life that makes our region a great place to live.
- **Sustainability** protects our regional vitality for generations to come by preserving our capacity to maintain and support our region's well-being and productivity over the long term.

3 Principles to Guide the Metropolitan Council's Work

- **Integration** is the intentional combining of related activities to achieve more effective results, leveraging multiple policy tools to address complex regional challenges and opportunities.
- **Collaboration** recognizes that shared efforts advance our region most effectively toward shared outcomes.
- **Accountability** includes a commitment to monitor and evaluate the effectiveness of our policies and practices toward achieving shared outcomes and a willingness to adjust course to improve performance.

The three principles are also significant to the Public Participation Plan in helping to guide regional transportation planning. Specifically, they are integrated throughout the participation plan to support the approach that:

- Reflects the interests and priorities of the diverse stakeholders of the Twin Cities transportation planning area – including residents, employers, policymakers, local government officials and staff, developers, and other interested stakeholders.
- Engages a cross-section of the transportation planning area's residents, including residents from all parts of the area and from a representative range of demographic characteristics (race/ethnicity/nationality, age, and income level).
- Transcends political differences and transitions by assuring robust participation by partners, stakeholders, and constituents.
- Promotes a regional approach to economic growth and competitiveness.

More information about *Thrive MSP 2040* can be found at <http://www.metrocouncil.org/Planning/Projects/Thrive-2040/Thrive-MSP-2040-Plan.aspx>.

Public Engagement Plan

Among the new elements called out in *Thrive MSP 2040* is the need for a more inclusive approach to engaging community – both individuals and the broader community at-large. In response, the Council created and implemented a Public Engagement Plan to establish principles and guidance for all Council outreach and engagement activities as a specific way to address equity in the region.

This Public Engagement Plan refocuses participation activities on the people of the region, rather than just the infrastructure we're planning for and building, or the traditional processes that may be commonplace, but don't necessarily engage certain communities effectively. It sets the tone for the Council on how to do business with the people throughout the region – namely the notion that the Council will come to the people, not make the people come to the Council.

Specifically, the policy sets the expectation that constituencies will be consulted prior to any outreach activities, to assure greater effectiveness in those efforts. Success will be measured against those expectations and plans that result from consulting with constituencies.

Transportation planning is not only about transit, roads, infrastructure and government. It also involves people — the involvement of the individuals who use regional transportation programs and services, and experience the impact of the transportation system; the people who live, work and enjoy recreation throughout the region. By facilitating this change, the public is empowered to rightfully take ownership of their communities. This knowledge of people's experiences with the system is gathered in an ongoing and iterative manner – conversations happen all the time, and sometimes informally, rather than being isolated to specific projects. As we gather information and learn, we work that knowledge and experience into the next effort.

In response, this Transportation Public Participation Plan focuses on building long-term relationships, which also include the expectation of ongoing communication (rather than self-contained projects that lack connection to the bigger picture). It is flexible to leverage opportunities for shared agenda-setting and meaningful engagement that might pop up in-between significant planning efforts.

The Public Engagement Plan has influenced the nuances of the participation plan by reinforcing the Council's commitment to engagement in all of its regional planning and to support outcomes that are equitable for all the region's constituencies. A key purpose

of the Council's engagement plan is to encourage change in how planning is perceived and shaped. The Council partners with people to jointly make decisions that impact the region.

The following principles are front and center when approaching outreach and engagement:

- Equity
- Respect
- Transparency
- Relevance
- Accountability
- Collaboration
- Inclusion
- Cultural Competence

The principles within the Council's engagement plan provide guidance to public participation in the transportation context to ensure that the region's diverse communities are represented and included in a meaningful way. These principles are simultaneously guided by *Thrive MSP 2040*, the state-required comprehensive regional plan.

The Public Engagement Plan was created collaboratively with community stakeholders. Community members wrote and structured significant portions of the plan and vetted related sections with community partners. Dozens of meetings with hundreds of comments led to the Council's policy. Constituencies in the public fundamentally influenced the content in the plan, and that policy significantly influences this Transportation Public Participation Plan, as well. Every day Council outreach staff are adapting methods to be responsive to community needs. That influence will continue throughout the process to implement the participation plan, as well.

For more information about the Public Engagement Plan, and to read more about the community members who participated in creating it, refer to <http://www.metrocouncil.org/About-Us/Publications-And-Resources/Public-Engagement-Plan.aspx>.

Transportation Policy Plan

The Transportation Policy Plan echoes the outcomes and principles that are outlined in *Thrive MSP 2040* and the Public Engagement Plan, and it serves as a building block for transportation planning for the metropolitan region. Participation from the public is essential to transportation planning and to the Transportation Policy Plan specifically. Together in partnership, the Council and the people of the region can build a

transportation system that provides a strong foundation for access and efficiency, yet also encourages flexibility as the region continues to change and grow.

Both state and federal law require the Council to draft and adopt the Transportation Policy Plan which is the regional vision for planning and developing the region's transportation system. The Transportation Policy Plan is updated at least every four years. It lays out a course of action to maintain and enhance our existing facilities, better connect people and communities, and provide more transportation choices that will make the region stronger and a better place to live, through six goals:

- Transportation System Stewardship
- Safety and Security
- Access to Destinations
- Competitive Economy
- Healthy Environment
- Leveraging Transportation Investments to Guide Land Use

Guiding Principles for Public Participation

The following values and principles comprise the core of the participation plan and have helped shaped and guide both *Thrive MSP 2040* and the Public Engagement Plan.

- Regional planning and transportation planning are about people – we're building better communities for all of our region.
- People, businesses, and the broader community have a stake in the region's transportation decisions.
- Participation processes should facilitate discussion and dialogue about transportation impact on the natural and built environments.
- Participation in policy discussions and decisions should be meaningful and have impact in the appropriate contexts.
- Participation opportunities should be inclusive and assure groups traditionally underrepresented in regional policymaking are engaged.
- A variety of participation activities should be used to assure the process can be responsive to the needs of affected audiences and groups.
- Multiple methods will be used to capture public comments, including traditional methods (mail, phone) and emerging methods (email, online forums, and related opportunities).
- Information submitted will be summarized and communicated to participants and the general public, and its impact on the planning process will be tracked.
- Whenever possible, public meetings will be scheduled at times and in locations that are accessible by transit riders and people with disabilities, to avoid potential

conflicts with opportunities hosted by other units of government, in locations throughout the region to provide convenient/nearby access to the process, and at different times during the day and evening hours to accommodate a variety of work schedules.

- Opportunities will be promoted widely, both through the Metropolitan Council's channels, and also through organizations and agencies partnering with the Council on various planning and outreach efforts.

Public participation includes a broad range of activities geared to inform stakeholders, interested parties, and the public about a topic and to provide opportunities for the public at-large, as well as specific stakeholders, to participate and engage in the processes used to create policies. Technology is increasingly used to connect with audiences, and the rapidly changing nature of technology means new methods and communications channels become available regularly. Processes will use technology methods and capture emerging technologies when appropriate, including visualization techniques. However, technology will not replace in-person engagement methods, though it may be used to enhance in-person engagement.

Transportation Public Participation Process and Strategies

The Council strategically approaches public participation to meet the needs of the region. It is important to reach out to stakeholders from all backgrounds and perspectives to have well thought out policies that benefit everyone. Public participation is done holistically and comprehensively with the practice of collaboration and inclusion (both are principles of the Public Engagement Plan, as stated above).

Stakeholder Engagement

Partners in local and state government have a key role in helping to shape the work of the Council and are pulled in at early stages of engagement – especially to help plan and shape participation methods. Specific constituencies include:

- Residents of the region – including drivers, bicyclers, pedestrians, and transit users
- Elected officials and staff of counties, cities, the state and other relevant public agencies (Minnesota Department of Transportation, Minnesota Pollution Control Agency, Metropolitan Airports Commission)
- Freight interests (including ports, shippers, freight transportation services)
- Business interests (employers and employees)
- Organizations that represent public transportation employees, private transportation, and commuting programs (carpooling, vanpooling, parking and transit benefit programs, telework, etc.)

- Interests historically underrepresented in regional planning efforts (communities of color, cultural communities, the disability community)

When applicable, the Council will also engage agencies that represent rural parts of the region, as well as urban centers. Agencies with expertise in areas such as land use and multi-modal solutions, identified in the Transportation Policy Plan as regional goals, are also engaged.

Constituencies who have not been historically engaged in policy dialogues with the Council will be intentionally included in engagement. Outreach activities actively seek out the involvement of underrepresented communities to open up opportunities for involvement and giving feedback. This can be done by targeting public information toward these groups and conducting special outreach to invite more participation in the future.

Building new relationships in non-traditional groups for the Council is an ongoing effort. At the same time, it is important to leverage the relationships that are already established in order to cultivate long-lasting connections. One example of this kind of partnership is the Council's Community Engagement Steering Committee, where work is being done to improve community engagement with ELL and immigrant populations. A second example is the Council's Equity in Place initiative where the focus is place-based equitable development.

Strategies

The strategies identified below reflect commonly used public participation methods in transportation planning. Outreach and public involvement are valuable activities that can engage stakeholders, underrepresented constituencies and newer audiences in shaping the region-wide transportation system.

1. Creating background information for posting on web sites, and for use in fact sheets, handouts, and other materials.
2. Convening stakeholders for discussion around large topics of regional scale.
3. Sponsoring listening sessions, workshops or conferences to feature policy aspects and promote topic-based policy discussions on plan content.
4. Using social media to connect constituencies to planning efforts and promote involvement – both for two-way discussion and one-way push marketing. Includes using interactive techniques (such as crowd-sourcing and visual wiki-mapping) to gather data and facilitate feedback.
5. Designing and disseminating informal surveys – use social media, electronic mailing lists, idea-gathering platforms and websites to ask questions and promote discussion spaces.

6. Utilizing online interactive engagement tools with abilities to crowdsource or generate surveys; interactive online maps and visualization which support features such as layering, videos, creating markers and providing feedback. (Related to social media methods.)
7. Offering forums, including online forums, to elicit stakeholders' and communities' ideas and perspectives on regional issues, projects and initiatives.
8. Developing special events to announce, highlight or kick-off an issue, discussion, project, initiative or news event.
9. Offering open opportunities to learn about the project, through open houses, meetings/tours/receptions specific to locations that interest the public, or other experience in order to highlight an initiative, project or facility.
10. Soliciting in-depth information by hosting focus groups or small-group discussions about issues, activities or public perceptions from stakeholders.
11. Update existing foundational planning documents (including the Transportation Planning and Programming Guide and the Transportation Policy Plan) to reflect lessons learned through engagement strategies.
12. Include engagement guidance in Work Program for the Transportation Policy Plan, and specific expectations for items funded through the Unified Planning Work Program.

A mixture of several or all of these strategies will be used in every effort, as is appropriate for the specific audiences and constituencies. A specific plan of activities will be created for each effort that reflects the broader goals, strategies, and tactics of this Public Participation Plan. Those plans will be posted online and communicated widely to clarify for constituencies how and when they can participate.

Public Comment and Promotion

State and federal law require formal public comment processes for specific short-term and long-term planning efforts. The public comment period is designed to more formally involve people in the transportation planning process. These formal comment processes generally occur at the end of an effort, as a final opportunity to lend voice and feedback to decisions.

When a public hearing is involved in the process, it unfolds as follows:

- Council policy requires Council action to set hearing dates at least 45 days before a public hearing occurs. State law requires 30 days notice, and this accounts for that time.

- A public notice is placed on the Council’s website, and in a newspaper of regional circulation to formally announce public meetings/hearings and how to comment.
- A news release is issued to the following major and niche outlets:
 - Major metro-wide circulation daily newspapers/related daily Web news outlets
 - Public policy websites and news sites
 - All television stations in the metro area
 - All radio stations in the metro area
 - Online and printed publications with non-daily production schedules
 - Ethnic news organizations (newspapers, online sites, radio)
 - Other niche audience publications
- Other optional promotional activities are also used:
 - Paid Web advertising
 - Paid Facebook advertising
 - Earned promotion through various partner organization newsletters, websites, and publication channels (typically community organizations that represent a specific, hard-to-reach or general audience).
 - An informational news article is posted on the Council’s website that includes the nature of the decision and how people can get involved. This article is distributed through the Council’s online and print newsletter, as well as social media channels.
- Proactive engagement with key constituencies to assure they are aware and can participate in the process – this is broad for large-scale regional discussions and more targeted for specific, smaller-scale conversations.
- The Council collects public comment through the Website, via email, via traditional mail, and via recorded phone message. Oral and written testimony is received via public hearing. A report is created at the close of the process, and that information is shared publicly and with the Council for decision-making.
- State law requires a public comment process to remain open for 10 days after a public hearing. Public comment processes are never closed on a weekend day.

Specific efforts, identified in the tables below, may have slightly different public processes. They are noted there.

Effort-Specific Strategies for Transportation Plans and Programs

Transportation Policy Plan

The Transportation Policy Plan sets policies and investment guidance for the regional transportation system, based on the goals and objectives in Thrive MSP 2040, the region’s

development guide. The transportation plan is one of three major systems plans that result from Thrive MSP 2040. It also responds to federal planning guidance provided in the Moving Ahead for Progress of the 21st Century Act, known as MAP-21.

The Transportation Policy Plan reflects a combination of technical analysis and policy discussion. The plan builds on Thrive MSP 2040 and its extensive public engagement process, on previous regional transportation plans, studies of significant regional transportation issues, discussion and feedback from policymakers throughout the region, and ideas and feedback from other regional stakeholders.

<p>Public Participation Strategies</p>	<p>Every transportation-related planning study has an engagement component. That feedback and guidance also influences any updates to the regional transportation policy plan.</p> <p>The standard Council public comment/promotion process identified above applies to the Transportation Policy Plan update process. In addition, the Council will do the following:</p> <ol style="list-style-type: none"> 1. Include any transportation-related feedback and guidance from other regional planning activities, including Thrive MSP 2040 (regional development guide) and transportation corridor planning and implementation. Use this information in creating any public participation plans 2. Develop outreach and engagement plan for the region, in consultation with stakeholders <ul style="list-style-type: none"> • Create interactive web-based engagement tool that will allow users to provide feedback and discussion • Conduct stakeholder meetings that target a broad swath within the community including businesses, council districts and community based coalitions; conduct one-on-one meetings if necessary • Partner with research groups, transportation experts and urban planners within government and the community to gather information and data on needs assessments and current trends • Performance-based workshops • Focus groups and/or listening sessions 3. Promote the plan using the Metropolitan Council's website, Twitter, Facebook, and printed materials; include online information and notices, interactive online visualization and mapping tools (for illustration and facilitating tradeoff discussion), opportunities for public comment, media releases, web and media strategies 4. Engage TAC/TAB members, council members and other stakeholders early in and throughout the process of preparing a draft plan for public review to provide guidance to the existing plan
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	<ol style="list-style-type: none"> 5. Engage TAC/TAB, council members and representatives from local government during the execution of engagement plan 6. Create specific stakeholder/policy-maker advisory groups to guide policy development in the plan, where necessary 7. Include engagement plan with Work Program to establish expectations for upcoming planning studies. 8. Identify key issues, provide context to them, and communicating progress toward related policy to stakeholders, such as those for the 2018 update: <ul style="list-style-type: none"> ● Autonomous vehicles ● Performance measurement ● Investment (rehab) and mobility in developed urban highway corridors (I-94 project) ● Equity and environmental justice ● Investment strategy (all modes)
Decision-making Roles	Technical Advisory Committee (Planning), Transportation Advisory Board, Equity Advisory Committee, Transportation Accessibility Advisory Committee, the Metropolitan Council

<p>Regional Solicitation</p> <p>The Regional Solicitation is a process that allocates federal transportation funds to locally initiated projects to meet regional transportation needs. The Council, as Metropolitan Planning Organization, works with the Transportation Advisory Board to review and allocate these funds, using an objective, data-driven, transparent process. Project selected through the Regional Solicitation also end up in the Transportation Improvement Program (TIP). Funds are typically awarded on a two-year cycle. Specific constituencies include the Minnesota Department of Transportation, counties, school districts, and cities in the region.</p>	
Public Participation Strategies	<ol style="list-style-type: none"> 1. Promote availability of Regional Solicitation funds via the Web, newsletters, email distribution lists, social media. 2. Provide general information about Regional Solicitation process and types of projects included. 3. Create informational news articles for the Council's website on projects chosen through the Regional Solicitation process. 4. Use online mapping and visualization techniques to display projects and illustrate scope and type of project. 5. Coordinate media outreach, in collaboration with local officials, to media outlets that cover specific geographic areas throughout the metro area. The goal of this outreach is to highlight projects throughout the region, educate about the federal funding processes, and provide an opportunity for local communities to share their projects. <p>Future process work</p>

	<p>The Council will collaborate with the Transportation Advisory Board and its Technical Advisory Committee to more actively engage communities in the region around the projects chosen through the Regional Solicitation process.</p> <ol style="list-style-type: none"> 1. Gather information from local communities about their engagement processes related to projects submitted for funding through the Regional Solicitation. 2. Provide technical assistance for engaging local constituencies about projects. 3. Investigate including engagement-related elements to a future Regional Solicitation application process. Create related performance measures for assessment. 4. Integrate this work with the potential workgroup identified in the TIP section below. <p>In addition, the Council will highlight completed projects funded through the Regional Solicitation process. The Council will use visualization techniques on its website. It will also create a standard template to highlight each project in a way that can be printed.</p>
Decision-making Roles	Minnesota Department of Transportation, Metropolitan Pollution Control Agency, Technical Advisory Committee (Funding), Technical Advisory Committee (Planning), Transportation Advisory Board, Metropolitan Council

<p>Transportation Improvement Program</p> <p>The TIP is a staged, four-year, multimodal program of highway, transit, bicycle, pedestrian and transportation enhancement projects and programs proposed for federal funding throughout the seven-county metropolitan area. The TIP is a federally required document that reflects funding available and reasonably anticipated (fiscally constrained). The Metropolitan Planning Organization is required to prepare the TIP as a short-range programming document that complements the long-range transportation plan. The Council prepares the TIP in cooperation with the Minnesota Department of Transportation. The TIP includes federal funds allocated through the regional solicitation process, and federal formula funds programmed by the Minnesota Department of Transportation, the Council and transit providers.</p>	
Public Participation Strategies	<p>The standard Council public comment process applies to the Transportation Improvement Program. A standard 45-day comment process applies. A 21-day comment process is used for any proposed regionally significant amendments to the TIP. The following additional items will take place for the next few cycles:</p> <ol style="list-style-type: none"> 1. Investigate what engagement process works best for the Transportation Improvement Plan. Tactics include but are not limited to:

	<ul style="list-style-type: none"> • Ask applicants from the Regional Solicitation why a project was chosen to be included • Ask local agencies about project engagement at the local level • Recommend support for project engagement at local level and for TIP <ol style="list-style-type: none"> 2. Conduct in-depth discussions among Council Communications and MTS staff regarding engagement strategies for the Transportation Improvement Plan 3. Create a work group consisting of Technical Advisory Committee/Transportation Advisory Board members, members of partnering agencies and other key stakeholders with the purpose of developing an engagement plan during the next Regional Solicitation revision 4. In publishing the TIP, use accompanying resources to visualize projects and region-wide impact.
Decision-making Roles	Minnesota Department of Transportation, Metropolitan Pollution Control Agency, Technical Advisory Committee (Funding), Technical Advisory Committee (Planning), Transportation Advisory Board, Metropolitan Council

<p>Unified Planning Work Program The Unified Planning Work Program is a federally required program that details and describes proposed transportation and transportation-related planning activities in the metropolitan area. The UPWP is a critical document in the planning and policy work of the Council as it also serves as the application for transportation planning funds from the U.S. Department of Transportation. The UPWP is prepared annually and describes metropolitan-area transportation planning activities being undertaken by four agencies: the Metropolitan Council, the Minnesota Department of Transportation, the Minnesota Pollution Control Agency and the Metropolitan Airports Commission.</p>	
Public Participation Strategies	<ol style="list-style-type: none"> 1. Work with the Minnesota Department of Transportation, Pollution Control Agency, Metropolitan Airports Commission and Transportation Advisory Board about the process of the Unified Planning Work Program; develop an outreach and engagement plan with help from partners and constituencies. 2. Include guidance for anticipated engagement strategies for projects included in the work program. 3. Develop online tool to obtain feedback from the public on what priorities the Met Council as an MPO should include in their work plan. 4. After draft of budget and work plan is completed, open up for public comments. 5. Apply standard promotional process to work plan.

Decision-making Roles	Technical Advisory Committee, Transportation Advisory Board, Equity Advisory Committee, Metropolitan Council
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<p>Air Quality Conformity Determination</p> <p>The Federal Clean Air Act Amendments passed in 1990 stipulate that transportation plans, programs, and projects in non-attainment and maintenance areas must undergo an air quality conformity analysis. The U.S. Environmental Protection Agency designates the seven-county metropolitan area and a developed portion of Wright County adjacent to the metropolitan area (along U.S. Highway 10 and I-94), as a maintenance area for carbon monoxide emissions. Therefore, transportation plans, projects, and programs are subject to air quality analysis.</p>	
Public Participation Strategies	<ol style="list-style-type: none"> 1. Recruit air quality and environmental experts onto the Minnesota Interagency Air Quality and Transportation Planning Committee; identify key issues, providing context to them, and communicating progress toward related policy to stakeholders, interested parties, and the general public 2. Analysis 3. Conduct public comment 4. Apply standard promotional process
Decision-making Roles	Technical Advisory Committee (Planning), Transportation Advisory Board

<p>Transportation Public Participation Plan (and effort-specific plans)</p> <p>This Transportation Public Participation Plan establishes a framework for the region’s stakeholders to influence both long-term transportation policy development and short-term transportation programming. It details the methods and strategies that the Metropolitan Council will use to engage the wide range of stakeholders, from policymakers, to business interests, to residents of the region.</p> <p>Plans for specific planning studies and related transportation planning efforts will also be created, consistent with this plan.</p>	
Public Participation Strategies	<ol style="list-style-type: none"> 1. Engage affected constituencies in determining specific goals, strategies, and effectiveness measures 2. Create draft for feedback from constituencies (including advisory committees identified below) 3. Publish draft and release for public comment; a standard 45-day comment process applies 4. Apply standard promotional process 5. Compile public comment and revise; conduct second public comment review if revisions are significant 6. Conduct annual evaluation of plan effectiveness; Include specific evaluation of effort-specific plans

Decision-making Roles	Technical Advisory Committee (Planning), Transportation Advisory Board, Equity Advisory Committee, Metropolitan Council
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Evaluation of Effectiveness

Public participation in transportation planning is measured against the outcomes, goals and principles of *Thrive MSP 2040*, the Transportation Policy Plan and the Public Engagement Plan in order to evaluate their effectiveness and ultimately, their impact on how planning and policy will be shaped. Methods that satisfy these measurements are the ultimate goal of public participation in transportation planning.

The public participation activities for transportation planning should achieve the following outcomes:

1. Provide policy details consistent with the overall vision included in the *Thrive MSP 2040* plan and the Transportation Policy Plan where relevant.
2. Employ practices consistent with the *Thrive MSP 2040* Outreach and Engagement Plan.
3. Build upon relationships and partnerships identified in the *Thrive MSP 2040* Outreach and Engagement efforts.
4. Support the key goals identified in the *Thrive MSP 2040* Outreach and Engagement Plan (as stated in this document).
5. Engage transportation stakeholders as identified in the Transportation Policy Plan.

It’s also important to note that evaluation and engagement are ongoing activities. Evaluation will take place after each effort – and aggregate review will take place semi-annually. Typically evaluation will take place through participant survey. Results are iterative and built into the next relevant engagement effort. While there are baseline measures of effectiveness and satisfaction with transportation efforts, the results of those measures should support the integration into future planning and participant ownership of the process, rather than merely using volume as a measure of success or reporting quantities of participants.

All public planning efforts are relevant to an audience. Public outreach and engagement efforts identify those key audiences and the methods that will be used to authentically convene and include voices from those audiences. Authenticity requires providing space for all feedback – whether perceived as positive or negative – to support the ultimate decision-making process. Relevance sometimes stirs controversy and it is the role of government to provide opportunities for all viewpoints to be raised and included. Particularly where controversy exists, effectiveness will be measured in terms of

whether the range of viewpoints were included and individuals felt respected and valued.

Authentic engagement is an evolving cycle that will lead to success when lessons are learned and the opportunity to foster involvement occurs. Below are some methods (which can either be qualitative or quantitative) for evaluating the effectiveness of public participation in transportation planning in order to achieve the goals stated above:

Goal/Outcomes	Policy	Method of Evaluation of Effectiveness
Consistency with overall vision, outcomes and goals	<i>Thrive MSP 2040</i> , Transportation Policy Plan	<ul style="list-style-type: none"> • Final reports that include data on the process of public participation • Case studies or project overviews are included in the Transportation Policy Plan to highlight the work that achieves these goals • Staff evaluation of data to compile a “lessons learned” narrative of the overall engagement method
Engagement was executed using practices and principles that are collaborative in nature and includes many perspectives of the region	<i>Thrive MSP 2040</i> , Public Engagement Plan	<ul style="list-style-type: none"> • Method engaged underrepresented communities throughout the region • All meetings are scheduled to meet the needs of community • Online engagement tools and other products are accessible to everyone
Building new relationships and leveraging existing ones	<i>Thrive MSP 2040</i> , Public Engagement Plan	<ul style="list-style-type: none"> • Existing relationships with partners and stakeholders are deepened with the Council • New relationships are formed within transportation and other sectors
Augment and amplify outreach and engagement goals	<i>Thrive MSP 2040</i> , Public Engagement Plan	<ul style="list-style-type: none"> • Integrate outreach and engagement goals into public participation plans that are measurable and transferrable to other transportation policies
Stakeholders are integrated with deliberation in engagement	Transportation Policy Plan	<ul style="list-style-type: none"> • Local government, other planning agencies and community-based transportation organizations are involved in engagement planning and determining specific measures

Goal/Outcomes	Policy	Method of Evaluation of Effectiveness
		by creating work groups or subcommittees <ul style="list-style-type: none"> • Local government, other planning agencies and community-based transportation organizations take a more interactive role in facilitating and participating in participation and engagement opportunities

Other measures that may be used to evaluate the effectiveness of public participation are:

- Number of people participating in public involvement activities
- Number and diversity of organizations participating in transportation planning efforts
- Number of individuals who participate in transportation-related online discussions; depth of participation in discussions (based on measurable activities)
- Percentage of county, city and township governments whose staff and/or policymakers participated in transportation planning efforts
- Earned media related to transportation planning efforts (and comparisons, as available)

Advisory Bodies

The Council’s advisory bodies provide key opportunities for stakeholder participation. They allow members, representing a cross-section of key stakeholder groups in the region, to help shape regional transportation plans and policies. The Council appoints members of the general public, local elected officials, professionals with technical knowledge and experience, or representatives of statute-identified groups, according to the responsibilities of particular advisory bodies. Advisory bodies may conduct studies, recommend action to the Council’s standing committees, and/or provide expert advice.

1. **Transportation Advisory Board (TAB):** The TAB works in conjunction with the Council to distribute federal transportation funds and set regional transportation policy. The TAB consists of 34 members: 10 elected city officials; 1 member from each county board in the metropolitan area; the Commissioner of the Department of Transportation; the Commissioner of the Pollution Control Agency; one member of the Metropolitan Airports Commission; one member from the

Suburban Transit Association; one person appointed by the Council to represent non-motorized transportation, one member representing the freight transportation industry, two members representing public transit, one “citizen” representative from each Council district (for a total of eight), and one Council member. The TAB chair is appointed by the Council from among the 34 members. The TAB works closely with the Council, reviewing, commenting on and coordinating transportation planning and programming activities. A key responsibility of the Council’s TAB is to solicit and evaluate project applications for federal funding programs.

2. **Technical Advisory Committee (TAC) to the TAB**: The TAC also works closely with the TAB and the Council. Composed of professional staff from city and county governments and the agencies involved in transportation in the seven-county region, the TAC provides technical expertise to the TAB. The TAC has two standing committees, the Funding and Programming Committee and the Planning Committee as well as ad hoc multimodal task forces
3. **Transportation Accessibility Advisory Committee (TAAC)**: The TAAC was created by the legislature and consists of 16 members including a chair appointed by the Council – seven members chosen by disability and senior groups in the metro area, and eight others, also selected by the Council, who represent districts that are combinations of the Council's 16 districts. At least half TAAC members must be certified as eligible for paratransit services under the Americans with Disabilities Act and be active users of public transportation in the metro area.
4. **Equity Advisory Committee**: In late 2015, the Metropolitan Council created an advisory committee to advise the Council on issues related to the equity commitments in Thrive MSP 2040 and other Council equity-related policy issues. The ultimate goal of the committee’s work is to create more equitable outcomes for people who live and work in the Twin Cities region.

**ATTACHMENT E: LANGUAGE
ASSISTANCE PLAN**

Title VI Limited English Proficiency Language Assistance Plan

**For the Metropolitan Council, Metro Transit, Metro
Mobility, and Transit Link**

January 2020

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II. About the Metropolitan Council

The Metropolitan Council is the regional policy-making body, metropolitan planning organization (MPO), and provider of essential services for the Twin Cities metropolitan region. The Council's mission is to foster efficient and economic growth for a prosperous region.

The 17-member Metropolitan Council is a policy board, which has guided and coordinated the strategic growth of the metro area and achieved regional goals for over 50 years. Elected officials and citizens share their expertise with the Council by serving on key advisory committees.

The Council also provides essential services and infrastructure – Metro Transit's bus and rail system, Metro Mobility, Transit Link, wastewater treatment services, regional parks, planning, affordable housing, and more – that support communities and businesses and ensure a high quality of life for residents.

A. Metro Transit

Metro Transit is an operating division of the Metropolitan Council and offers an integrated network of buses, light rail transit (LRT), and commuter trains as well as resources for those who carpool, vanpool, walk, or bike. The largest public transit operator in the region, Metro Transit provides roughly 85 percent of the transit trips taken annually in the Twin Cities. Metro Transit served 80.7 million bus and rail passengers in 2018 with award-winning, energy-efficient fleets.

Metro Transit operates the METRO Green Line LRT, METRO Blue Line LRT, Northstar commuter rail line and 127 bus routes, using a fleet of about 920 buses and 100 rail vehicles. In the last three years, Metro Transit opened the A and C Lines, two arterial bus rapid transit (BRT) lines that provide faster service and a more comfortable ride. Several more BRT lines are in development as Metro Transit seeks to expand its METRO BRT network. Metro Transit continues to develop and refine local and enhanced service throughout the region.

B. Other Transportation Services

The Metropolitan Council's Metropolitan Transportation Services (MTS) division oversees operations of Metro Mobility, Transit Link, and contracted fixed routes.

MTS contracted fixed routes are operated by private providers using Council-owned vehicles. However, these routes are branded as Metro Transit routes and are subject to the same policies as regular Metro Transit fixed routes. For the purposes of Title VI and language assistance, MTS routes are treated like any other Metro Transit fixed route, unless otherwise noted.

The Metropolitan Council also provides services that meet the needs of those not served by or not able to use Metro Transit.

Metro Mobility is a shared public transportation service for certified riders who are unable to use regular fixed route buses due to a disability or health condition. Eligibility is determined by the Federal Americans with Disabilities Act. Rides are provided for any purpose. Customers are eligible for Metro Mobility service if they are physically unable to get to the regular fixed route bus, they are unable to navigate regular fixed route bus systems once they are on board, or they are unable to board and exit the bus at some locations.

Transit Link is the Twin Cities dial-a-ride small bus service. It provides transportation to the public

where regular route transit service is not available. Transit Link is for trips that cannot be accomplished on regular transit routes alone and may combine regular route and Transit Link service. Anyone may reserve a Transit Link ride for any purpose, subject to availability.

III. Background Information

A. Purpose

The following document serves as the Title VI Limited English Proficiency Language Assistance Plan for the Council's Metro Transit, Metro Mobility, and Transit Link services. This document demonstrates the Council's commitment to provide meaningful access to all individuals accessing the Council's services. Internally this plan is intended for department managers and supervisors, and for staff who interact directly or indirectly with limited English proficiency (LEP) individuals. LEP legal requirements also apply to sub-recipients, subcontractors and vendors who do business with the Council. LEP community members and advocates can refer to this plan to learn about the Council's commitment to equal access.

Dissemination of the Limited English Proficiency Plan is to occur via many routes. Any internal or external individual will be able to access the plan via the Internet. LEP individuals can obtain copies/translations upon request.

Further questions regarding this plan may contact:

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B. Authority

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination.

Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," reprinted at 65 FR 50121, August 16, 2000 (Appendix A), directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. Federal agencies were instructed to publish guidance for their respective recipients in order to assist them with their obligations to LEP persons under Title VI. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. President Bush affirmed his commitment to Executive Order 13166 through a memorandum issued on October 25, 2001 by Assistant Attorney General for Civil Rights, Ralph F. Boyd, Jr. Federal agencies were directed to provide guidance and technical assistance to recipients of Federal funds as to how they can provide meaningful access to Limited English Proficient users of Federal programs.

The U.S. DOT published revised guidance for its recipients on December 14, 2005 (*Appendix B*). This document states that Title VI and its implementing regulations require that DOT recipients

take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for LEP individuals and that recipients should use the DOT LEP Guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP.

The Federal Transit Administration (FTA) references the DOT LEP guidance in its Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," which was published on October 1, 2012. Chapter III part 9 of this Circular reiterates the requirement to take responsible steps to ensure meaningful access to benefits, services, and information for LEP persons and suggests that FTA recipients and sub-recipients develop a language implementation plan consistent with the provisions of Section VII of the DOT LEP Guidance.

The DOT LEP Guidance recommends that all recipients, especially those that serve large LEP populations, should develop an implementation plan to address the needs of the LEP populations they serve. The DOT LEP Guidance notes that effective implementation plans typically include the following five elements:

- 1) Identifying LEP individuals who need language assistance:
- 2) Providing language assistance measures
- 3) Training staff
- 4) Providing notice to LEP persons
- 5) Monitoring and updating the plan

C. Responsibilities

The Council Regional Administrator has designated the ADA & Title VI Administrator as the Council's Language Assistance Liaison. The Language Assistance Liaison will be responsible for developing, executing and coordinating language services to LEP persons, and will collaborate with any sub-recipients covered under Title VI to ensure that they satisfy their LEP requirements. OEO is designated the lead department for LEP initiatives in order to assist the Language Assistance Liaison in ensuring that the Council, Metro Transit, Metro Mobility, and Transit Link continue to serve LEP customers. The Liaison will also investigate and resolve language access complaints from the LEP community.

IV. Identification of Limited English Proficient Individuals in the Service Area

DOT Guidance: *“There should be an assessment of the number or proportion of LEP individuals eligible to be served or encountered and the frequency of encounters pursuant to the first two factors in the four-factor analysis.”*

Metro Transit has addressed the federal requirements for assessing needs and providing services to LEP populations. The LEP needs assessment was conducted based on the Four-Factor Analysis, as outlined in the FTA Circular 4702.1B. This analysis includes:

- Identifying the number or proportion of LEP persons served or encountered in Metro Transit’s service area;
- Determining the frequency with which LEP individuals come into contact with Metro Transit’s services;
- Determining the nature and importance of the services to LEP people; and
- Assessing the current resources available and the costs to provide Language Assistance Services.

As a result of the Four-Factor Analysis, Metro Transit and the Metropolitan Council will translate all vital documents into Spanish, Somali, Hmong, Vietnamese and Karen. Details about how these languages were identified are described in Sections A, B and C below.

A. *The Number & Proportion of LEP Persons in the Service Area*

The U.S. Census Bureau collects data through the American Community Survey (ACS) to assess language characteristics within a geographic area. These data identify a person’s ability to speak English “very well” or less than “very well” and the language predominately spoken at home for those populations age 5 and older. The **2013-2017 ACS** provided quantitative information regarding LEP populations for the seven-county region and Metro Transit’s service area. An analysis of these data identified LEP populations and their language characteristics within the Metro Transit service area.

ACS data indicate that the total population within Metro Transit’s service area is **2,118,088**. In addition, **17%** of the total population is age 5 and older and speaks a language other than English at home (**352,234**). Of these individuals, **43% (153,549)** speak English less than “very well” representing **7%** of the total population within Metro Transit’s service area.

The Safe Harbor Provision, which the Department of Transportation adopted from the Department of Justice, stipulates that, “if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance.”

Table 1 lists LEP populations within Metro Transit’s service area according to the twelve foreign language classifications contained in the **2013-2017 ACS** at the tract level. No languages have LEP populations that exceed 5% of the total population in the service area. Eleven of the twelve languages classifications have LEP populations over 1,000.

Table 1: LEP Speakers in the Metro Transit Service Area

Language	Number of LEP Speakers	Pct. of Total LEP	Pct. of Total Population
Spanish	50,622	33.0%	2.4%
Other Asian and Pacific Island languages	39,657	25.8%	1.9%
Other or unspecified languages	28,782	18.7%	1.4%
Vietnamese	8,785	5.7%	0.4%
Chinese (incl. Mandarin, Cantonese)	6,449	4.2%	0.3%
Russian, Polish, and other Slavic languages	5,829	3.8%	0.3%
Other Indo-European languages	4,708	3.1%	0.2%
Arabic	2,772	1.8%	0.1%
French, Haitian, and Cajun	2,667	1.7%	0.1%
Korean	1,293	0.8%	0.1%
Tagalog (incl. Filipino)	1,023	0.7%	0.0%
German and other West Germanic languages	962	0.6%	0.0%

B. The Frequency of Contact Between LEP Individuals and the Council’s Transportation Services

This section includes information describing how frequently our transportation services interact with LEP communities in the service area. This information is collected through reviewing LEP population distribution, data from the Minnesota Department of Education, Language Line usage, bus operator surveys, supplemental data and anecdotal information provided by front line staff.

1. Interactions with LEP Populations

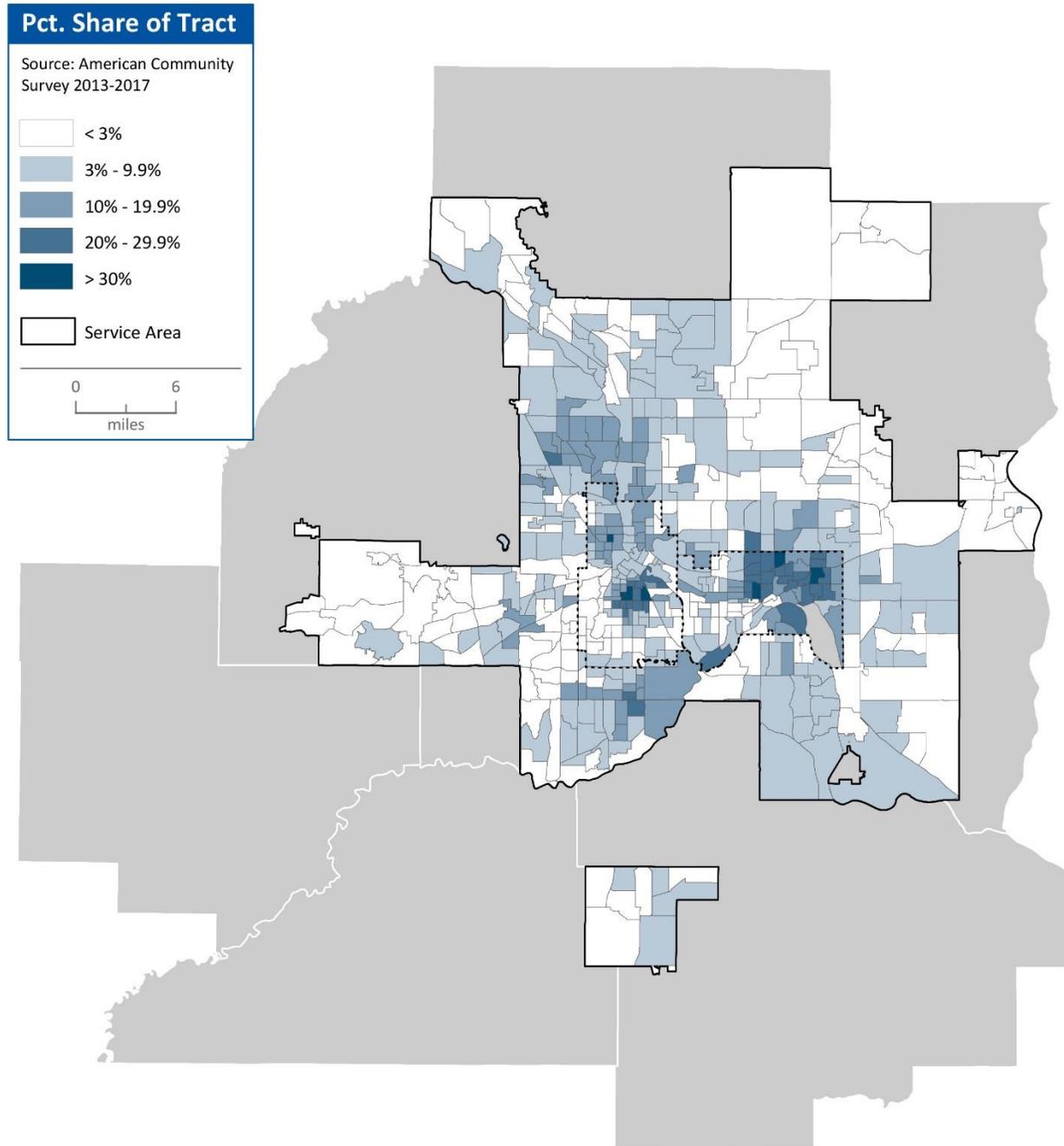
a) LEP Population Distribution

Using the language categories contained in the **2013-2017 ACS**, Metro Transit mapped the concentrations of LEP communities within the service areas. Results of the geographic distribution indicate the greatest densities of LEP speakers are located within the limits of Metro Transit’s service area and along well-served transit corridors. Figure 1 demonstrates that LEP communities are concentrated in central and east St. Paul, central and north Minneapolis and cities to the northwest and south of Minneapolis.

Figure 1

Distribution of All Limited English Proficiency (LEP)* Speakers

*English spoken less than "very well", ages 5 and older



No languages have LEP populations that exceed 5% of the total population in the service area. All twelve languages and language groups included in the **2013-2017 ACS** have LEP populations over 1,000. The most frequently spoken language is Spanish, which is spoken by 33.0% of the LEP population in the service area. Vietnamese is also a prevalent language whose speakers comprise 5.7% of the LEP population.

For language classifications containing multiple languages, tract analysis for individual languages is not possible because ACS does not break down the language data at this geographic level. School district data provides insight into languages that are not individually available in the ACS. The Minnesota Department of Education reports student populations that qualify for English Learner (EL) programs. Twenty-nine school districts are within the Metro Transit service area, and EL students enrolled in these school districts represent LEP persons who are reasonably likely to interact with transit. Table 2 below shows the home languages of EL students enrolled in these school districts, where languages with over 100 student speakers are broken out separately.

Hmong and Karen are languages classified under “other Asian and Pacific Island languages”, and Somali is classified under “other and unspecified languages” in the **2013-2017 ACS**. Student enrollment data shows that Hmong, Karen, and Somali are languages with LEP populations above 1,000. While EL students who speak Hmong and Somali are enrolled widely across school districts, Karen-speaking EL students are primarily enrolled in school districts in and around St. Paul.

Table 2: English Learner (EL) students (K-12) enrolled at school districts within the transit service area

Language	Number of EL Students (K-12)
Spanish	12,373
Somali	5,963
Hmong	5,867
Karen	2,206
Oromo	709
Arabic	504
Amharic	482
Vietnamese	470
Nepali	278
Chinese, Mandarin	241
English Creolized	209
Swahili, Kiswahili	182
French	181
Khmer, Cambodian	135
Tigrinya	115
Russian	101
Other languages with fewer than 100 ELs	1,124

Spanish and Vietnamese have LEP communities that each account for at least 5% of the total LEP population; similarly, Hmong, Karen, and Somali are within language classifications that each account for at least 5% of the total LEP population. No additional analysis was done for these five languages. It is assumed that more than 1,000 persons speaking each of these

languages interact with transit so vital documents will be translated into these languages.

Figures 2-11 map the tract-level distribution of LEP populations in the service area by each of the twelve language classifications of the **2013-2017 ACS**. Maps are not shown for Tagalog and German because no tracts in the service area exceed a minimum threshold of 3% LEP speakers in the total tract population. The following maps indicate:

- LEP Spanish speakers are more widely dispersed than the other language groups and are located in both urban and suburban communities (Figure 2);
- LEP speakers of “other Asian and Pacific Island languages” (i.e. Hmong and Karen) reside in North Minneapolis, in St. Paul along University Avenue and on the East Side, and also in suburbs in the north and northwest metro (Figure 3);
- LEP Vietnamese speakers are located in north and northwest areas of the metro, but are also located along University Avenue in St. Paul (Figure 4);
- LEP speakers of “other and unspecified languages” (i.e. Somali) are dispersed throughout the metro, with communities concentrated in Central Minneapolis and along University Avenue in St. Paul (Figure 5);
- LEP Chinese speakers are concentrated around the University of Minnesota, with other communities in suburbs and West Side St. Paul (Figure 6);
- LEP speakers of Russian, Polish, and other Slavic languages reside along corridors radiating from Minneapolis to the west and northwest suburbs, but also in Highland Park in St. Paul (Figure 7);
- LEP speakers of other Indo-European languages are dispersed with communities mainly in suburbs north of St. Paul (Figure 8);
- LEP Arabic speakers are concentrated in Highland Park in St. Paul and in the northwest suburbs (Figure 9);
- LEP speakers of French, Cajun, and Haitian live in the northwest suburbs (Figure 10);
- LEP Korean speakers reside around the University of Minnesota (Figure 11).

Figure 2

LEP* Distribution - Spanish Speakers

*English spoken less than "very well", ages 5 and older

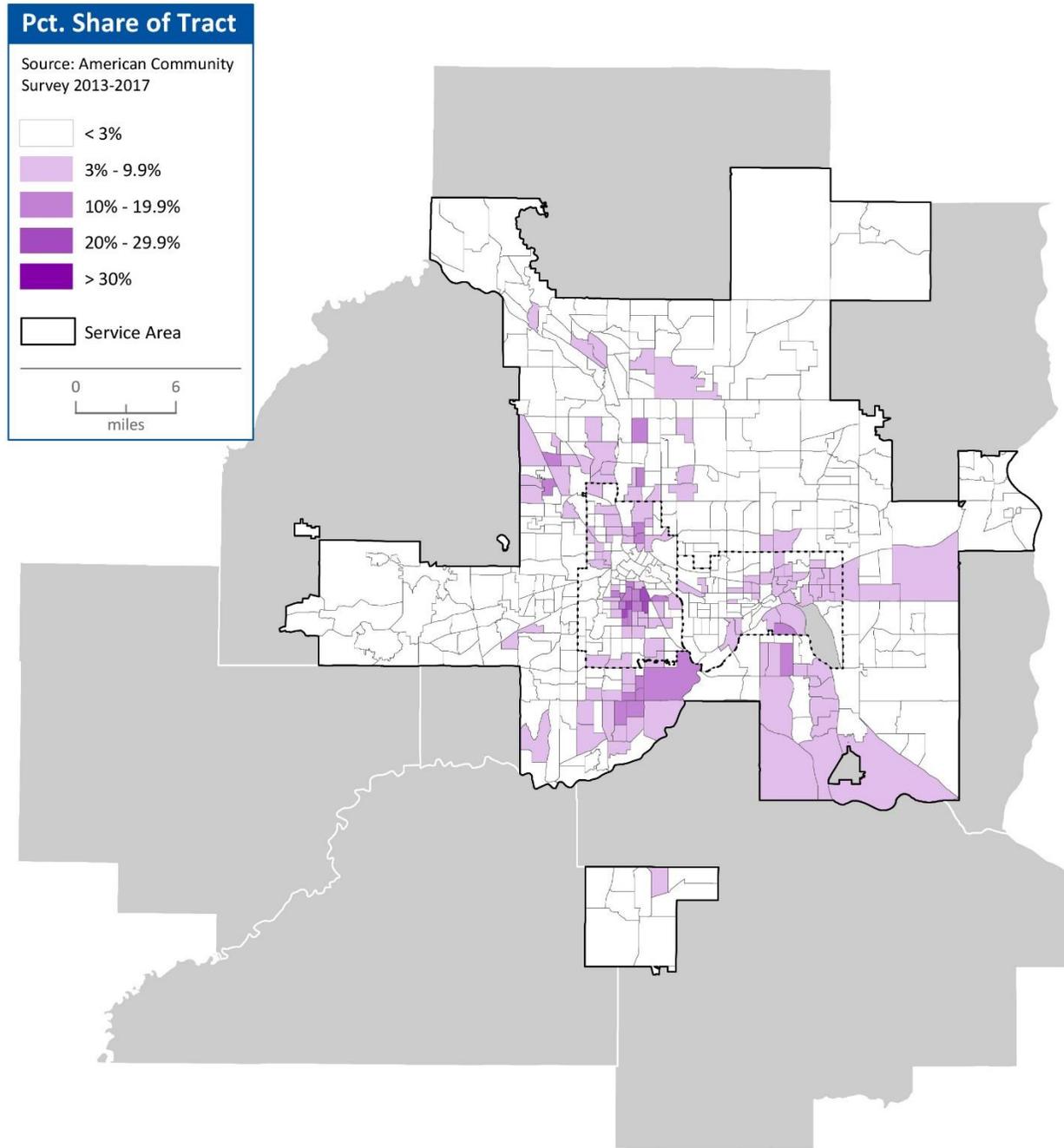


Figure 3

***LEP* Distribution - Other Asian and Pacific Island Language Speakers
(includes Hmong and Karen)***

*English spoken less than "very well", ages 5 and older

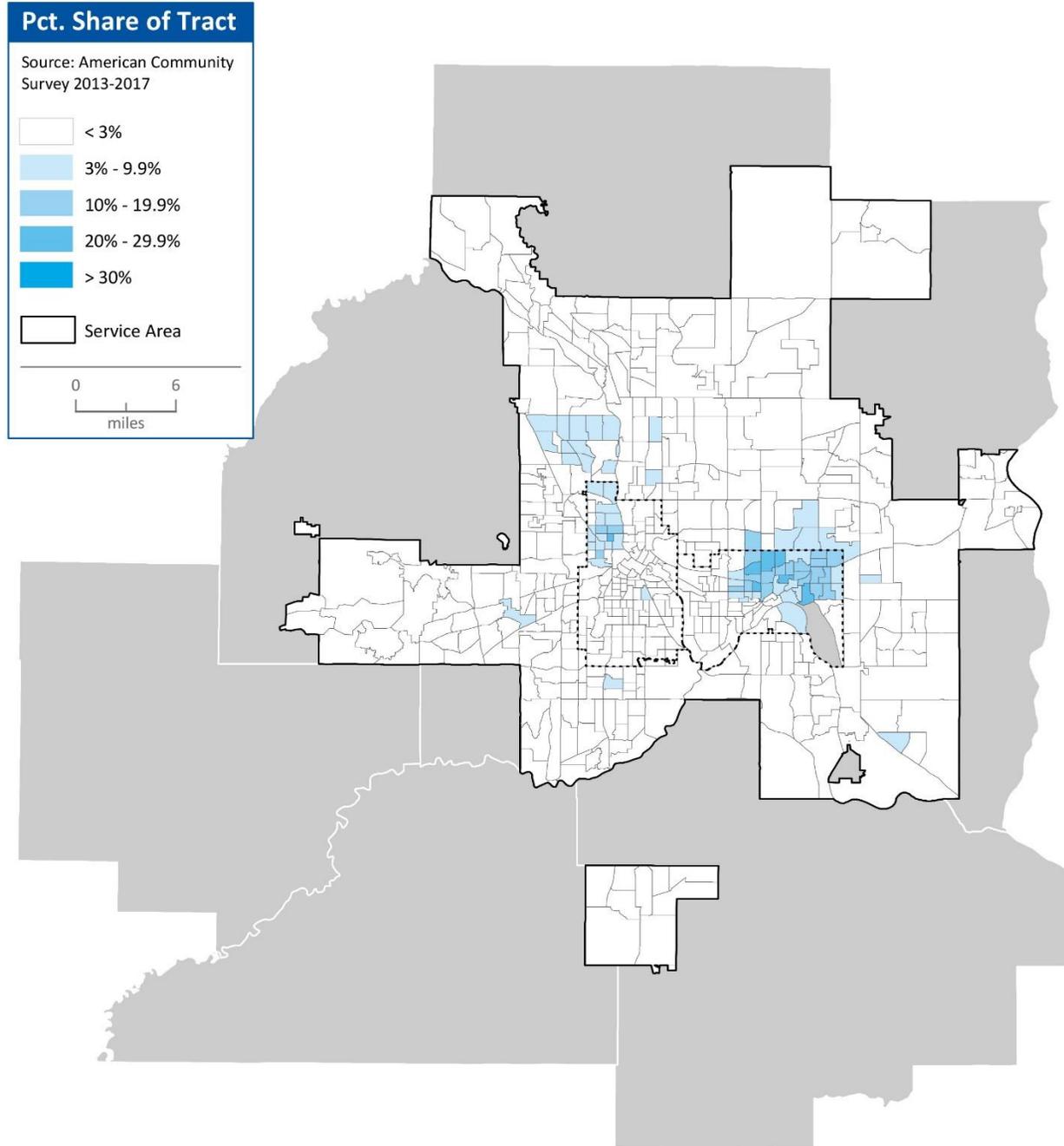


Figure 4

**LEP* Distribution - Other and Unspecified Language Speakers
(includes Somali)**

*English spoken less than "very well", ages 5 and older

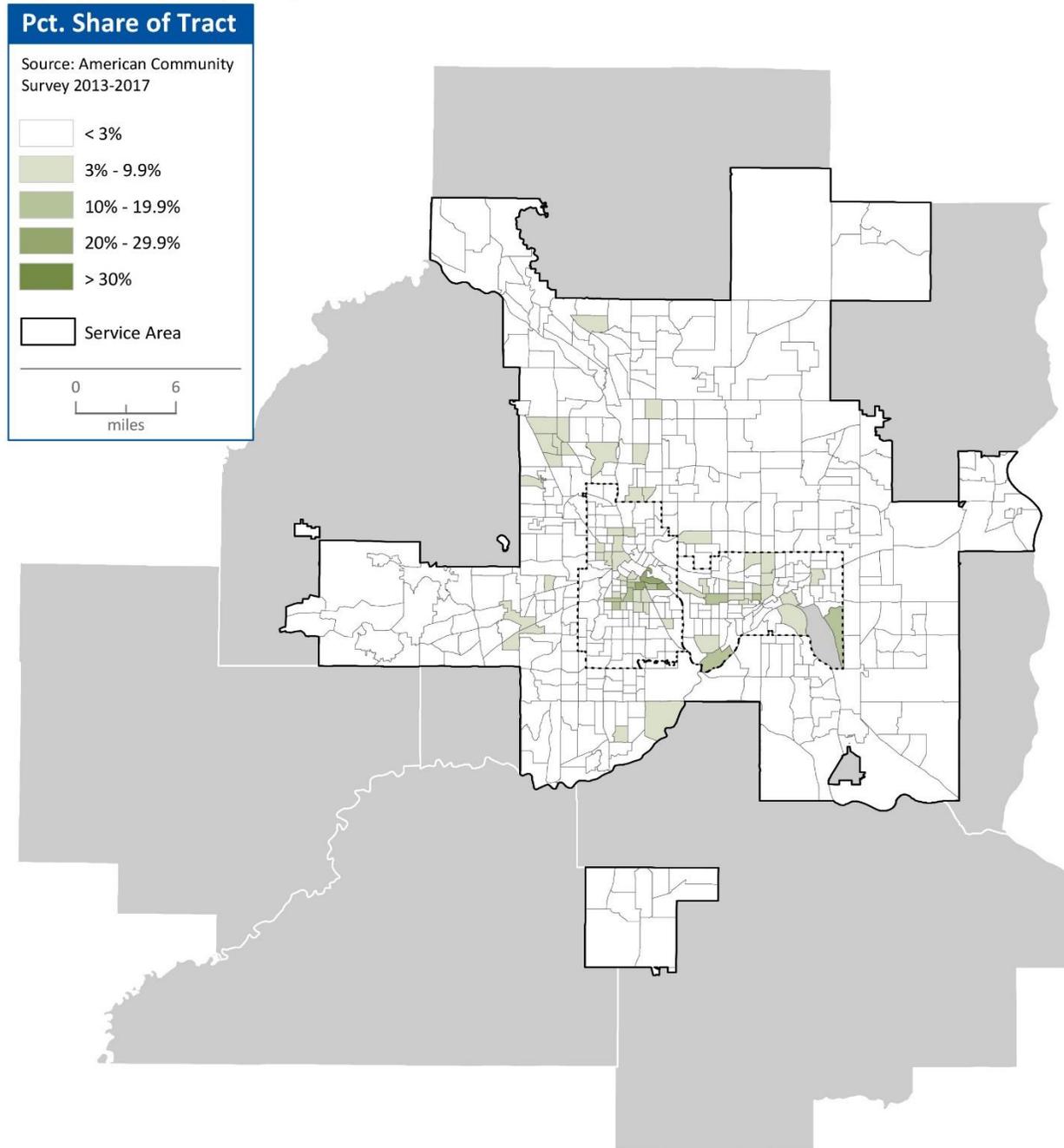


Figure 5

LEP* Distribution - Vietnamese Speakers

*English spoken less than "very well", ages 5 and older

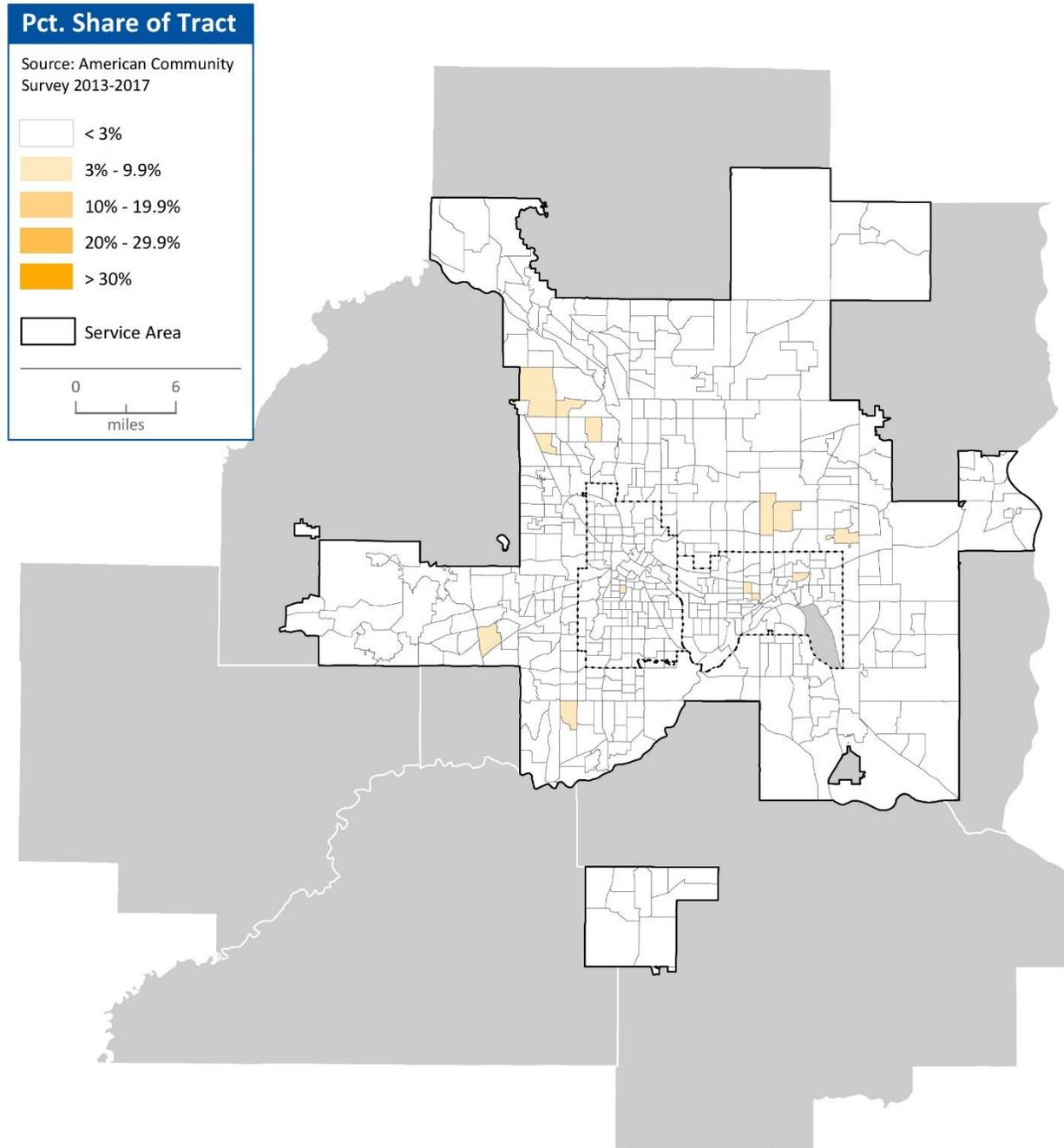


Figure 6

LEP* Distribution - Chinese Speakers (includes Mandarin and Cantonese)

*English spoken less than "very well", ages 5 and older

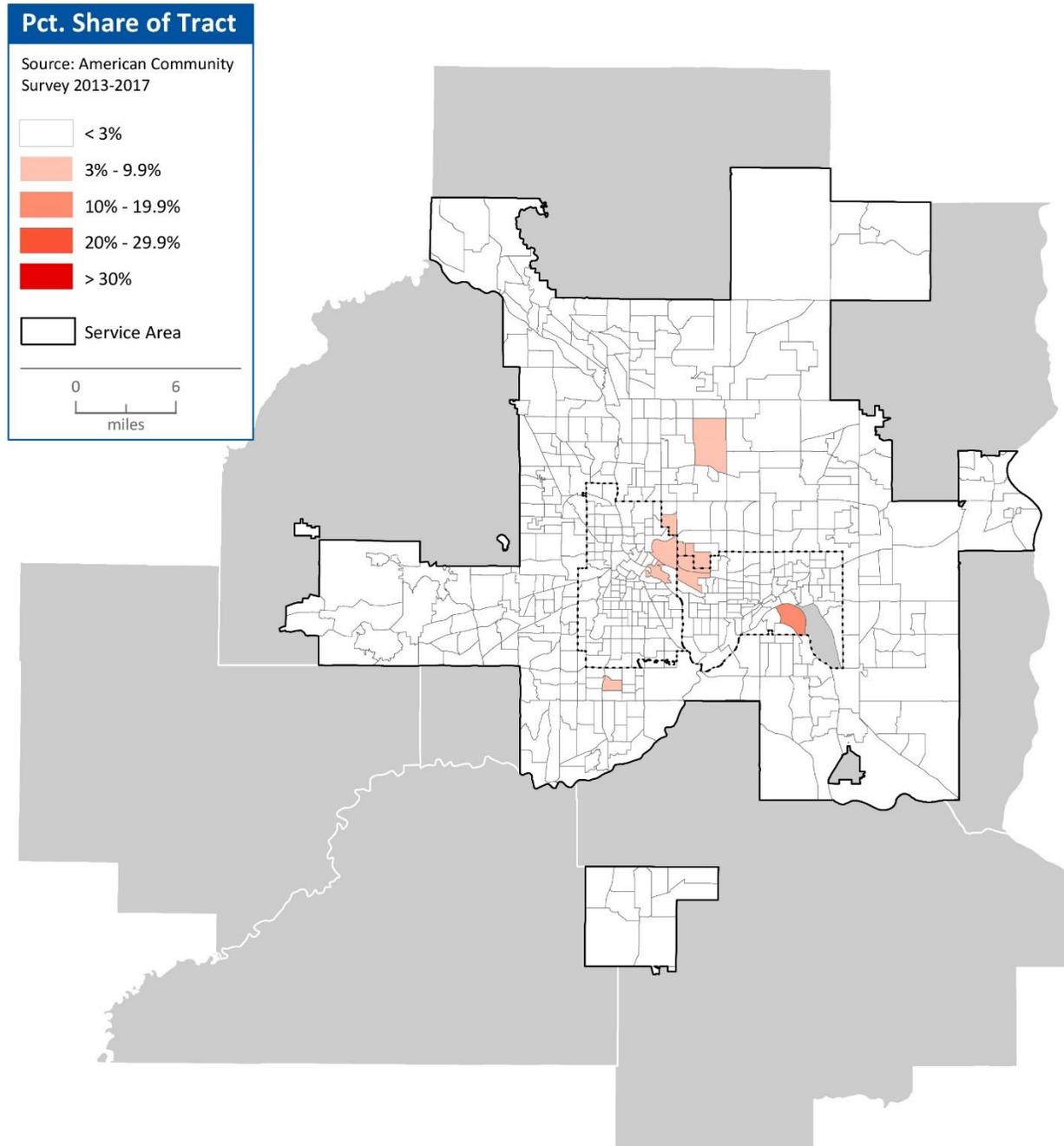


Figure 7

LEP* Distribution - Russian, Polish & Other Slavic Language Speakers

*English spoken less than "very well", ages 5 and older

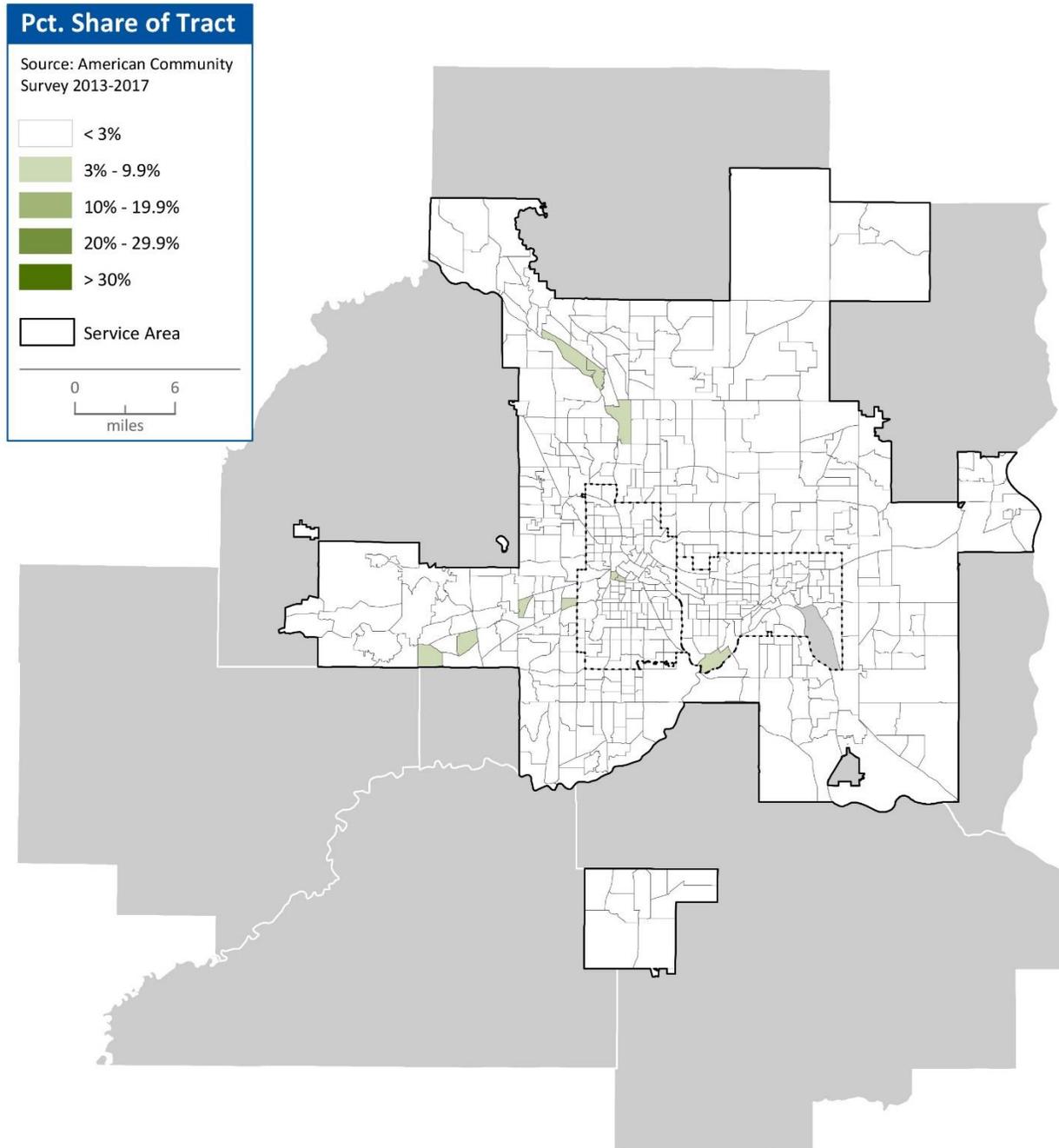


Figure 8

LEP* Distribution - Other Indo-European Language Speakers

*English spoken less than "very well", ages 5 and older

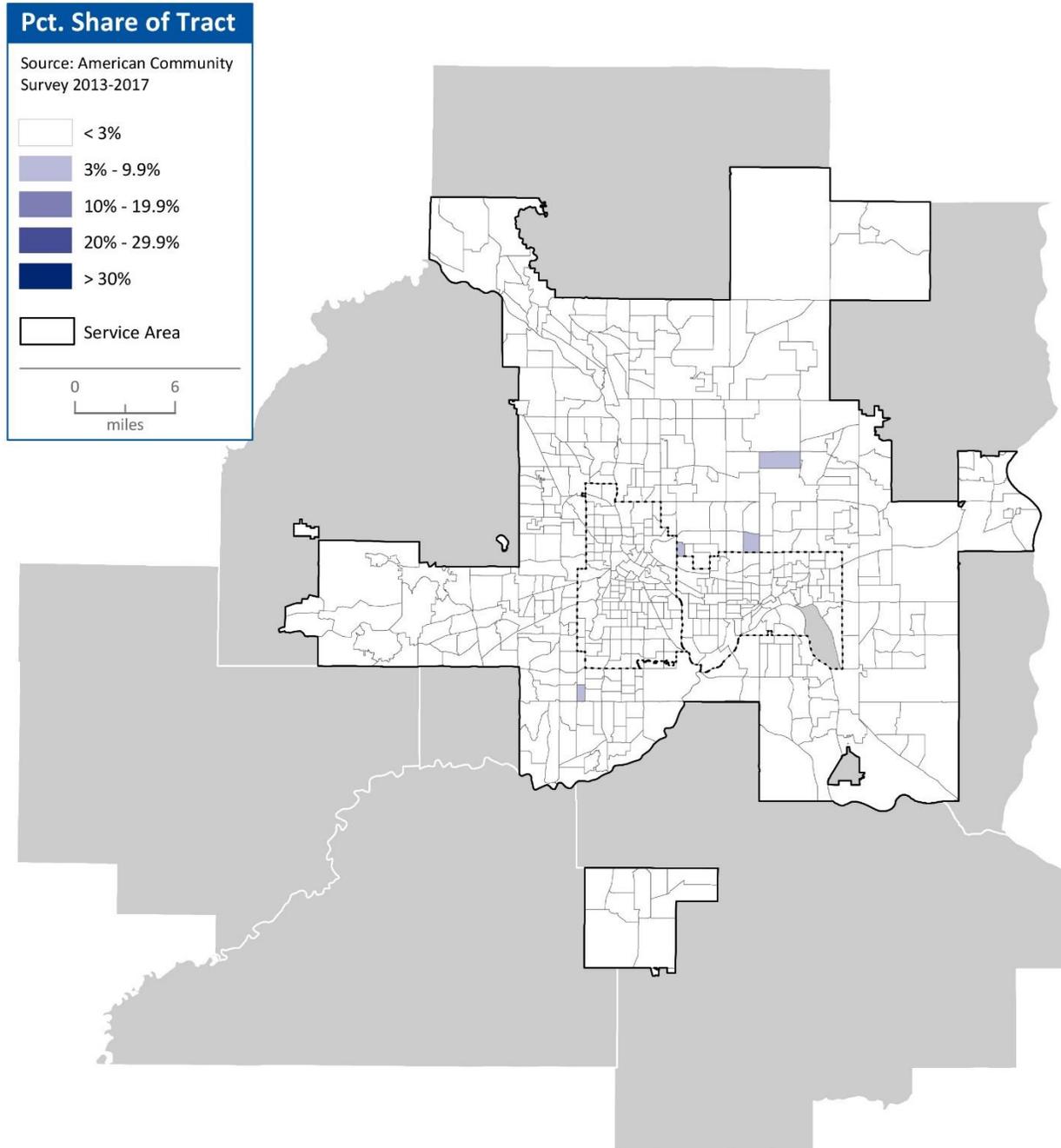


Figure 9

LEP* Distribution - Arabic Speakers

*English spoken less than "very well", ages 5 and older

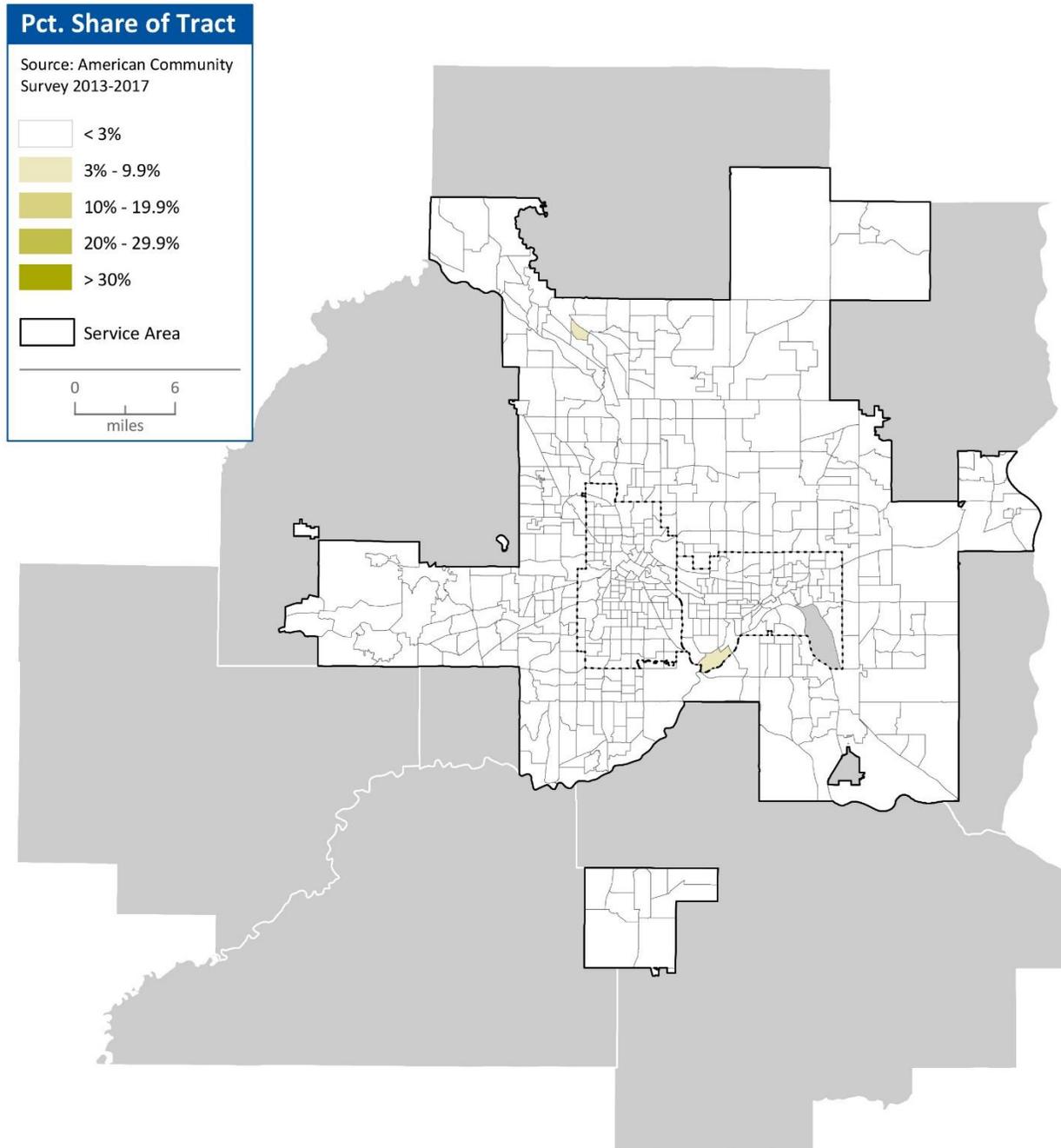


Figure 10

LEP* Distribution - French, Cajun & Haitian Speakers

*English spoken less than "very well", ages 5 and older

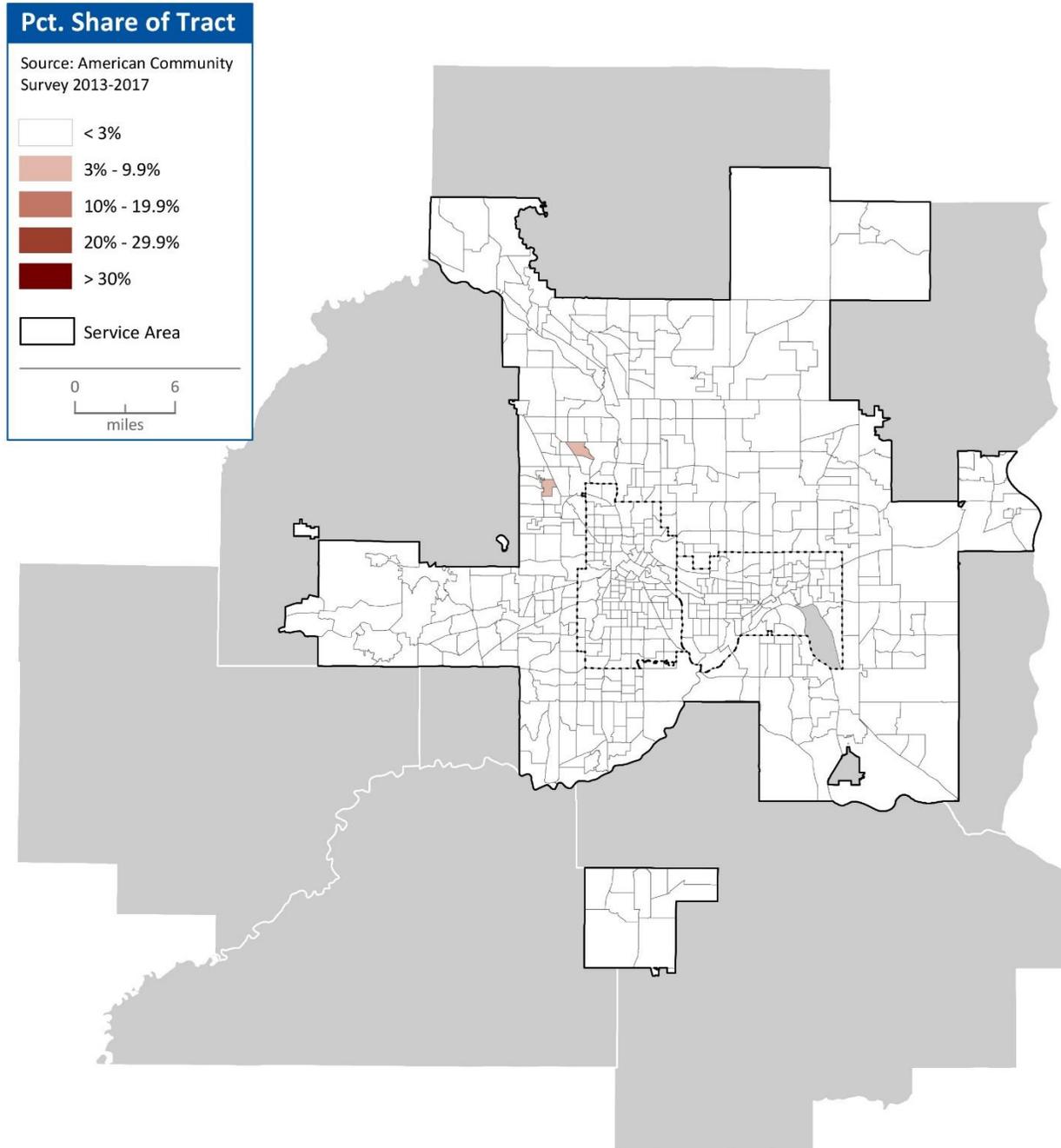
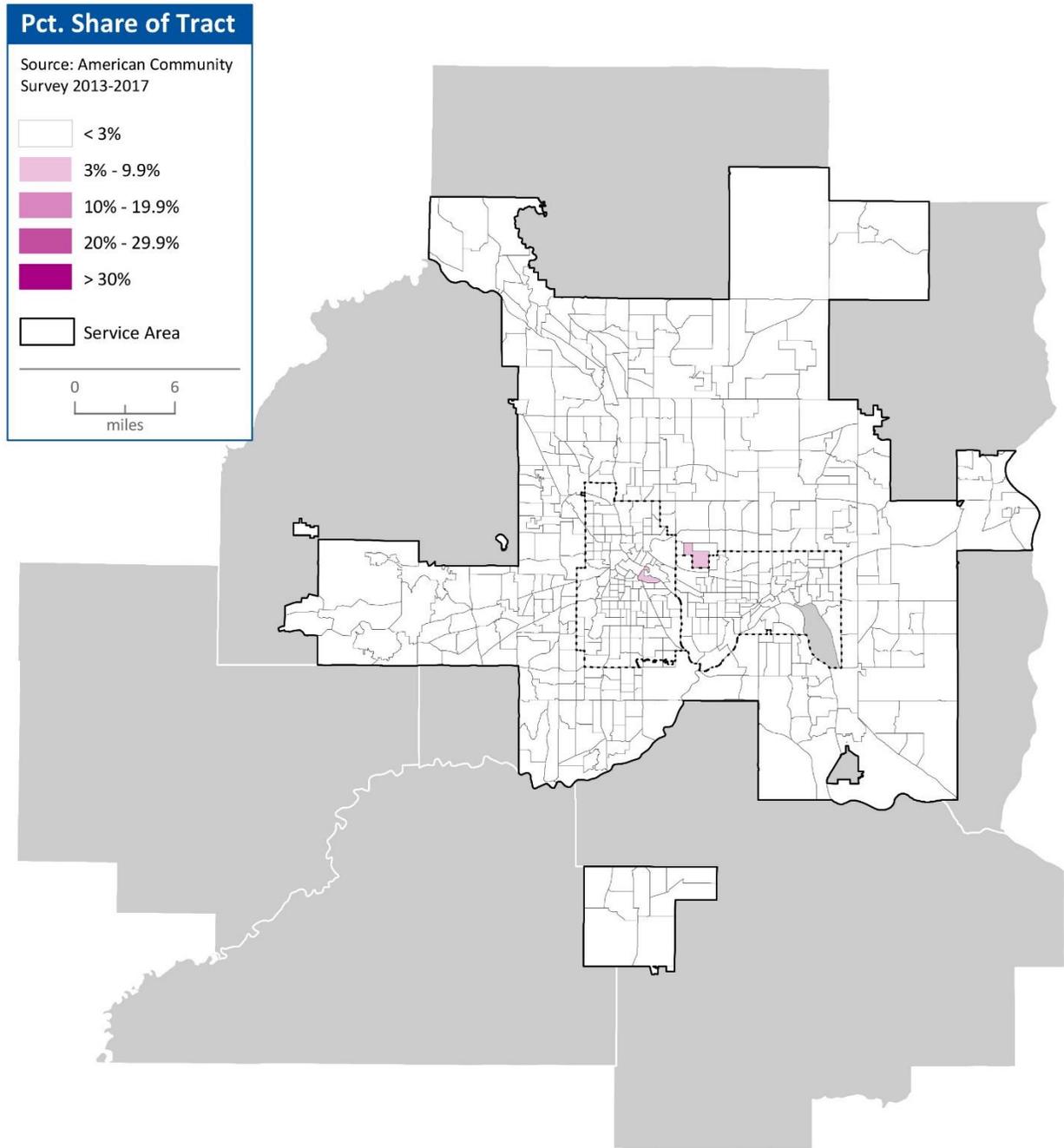


Figure 11

LEP* Distribution - Korean Speakers

*English spoken less than "very well", ages 5 and older



For languages with LEP populations comprising less than 5% of the total LEP population, mapping census tract-level data reveals where LEP speakers live. The distribution of LEP communities was compared to the availability of fixed route service to help determine whether 1,000 persons live near transit service. Buffers were applied in census tracts where more than 3% of the population speaks the specific language under review. Applying a quarter-mile buffer to bus stops and a half-mile buffer to transitway stations shows whether 1,000 speakers of the language under review are likely to encounter Metro Transit service.

To demonstrate the methodology, Figure 12 shows the relationship between LEP population distribution and proximity to transit for Chinese speakers. The shaded areas lie within the transit stop buffer zone. As shown in Figure 12, there are more than 1,000 Chinese LEP speakers concentrated in tracts with access to Metro Transit service.

Figure 13 replicates this analysis for LEP populations speaking Russian, Polish, and other Slavic languages. This method also demonstrates that over 1,000 LEP speakers of Russian, Polish, and other Slavic Languages are concentrated in tracts near transit service.

Arabic, Korean, French, and “other Indo-European languages” each have fewer than 1,000 LEP speakers concentrated near transit service. Tagalog and German are excluded from this analysis because no tracts in the service area exceed a minimum threshold of 3% LEP speakers in the total tract population.

Table 3 lists the number of LEP speakers residing in tracts where those LEP speakers make up over 3% of the tract population:

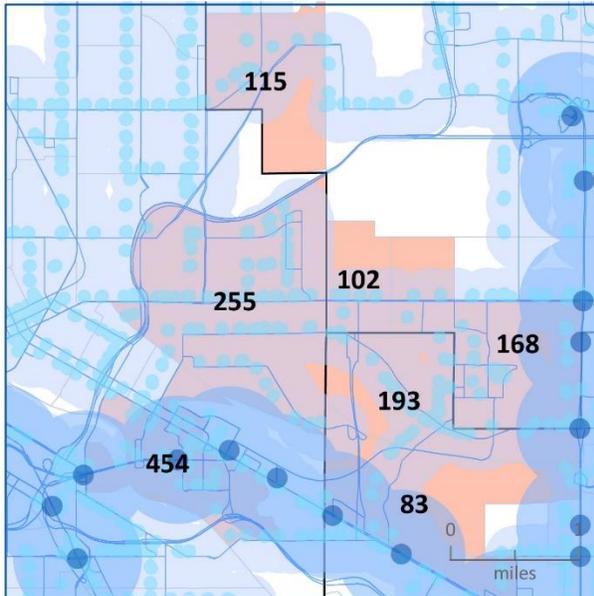
Table 3: LEP languages under 5% of total LEP population and population residing in proximity to transit

Language	LEP Speakers in Concentrated Tracts near Transit
Chinese (incl. Mandarin, Cantonese)	1,778
Russian, Polish, and other Slavic languages	1,663
Other Indo-European languages	619
Arabic	386
Korean	360
French, Haitian, and Cajun	303

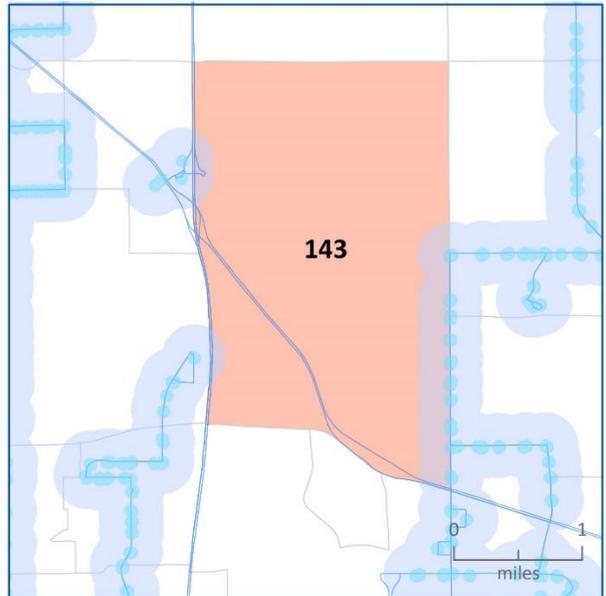
Figure 12

Proximity of LEP Chinese Speakers to Metro Transit Service

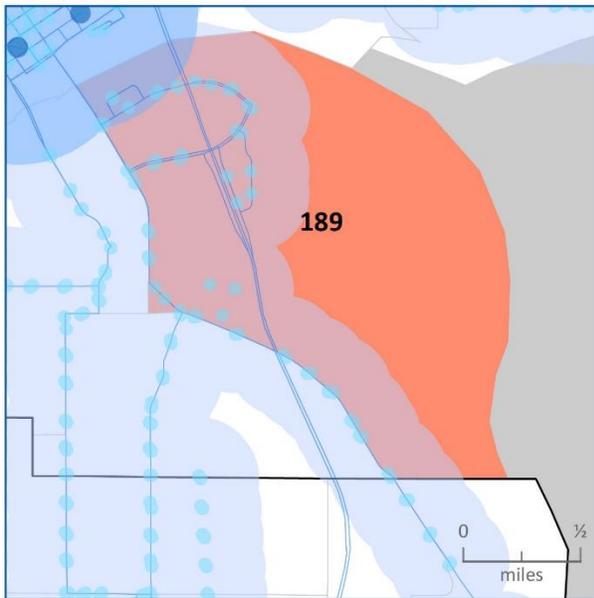
Area A



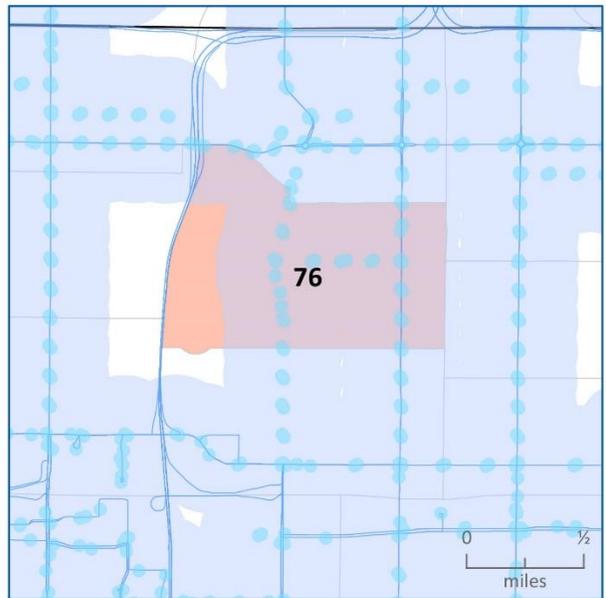
Area B



Area C



Area D



LEGEND

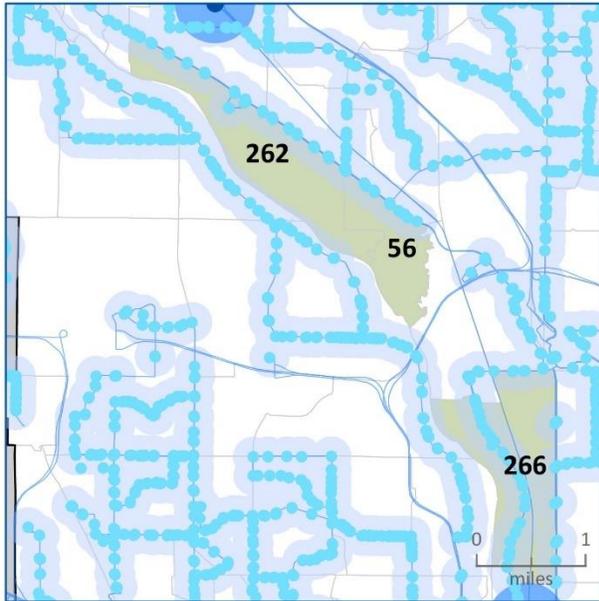
- 102 Census tract where population is greater than 3% LEP
- Count of LEP speakers
- Transitway station
- Bus stop
- Transit route
- 1/2-mile buffer - transitway stations
- 1/4-mile buffer - bus stops



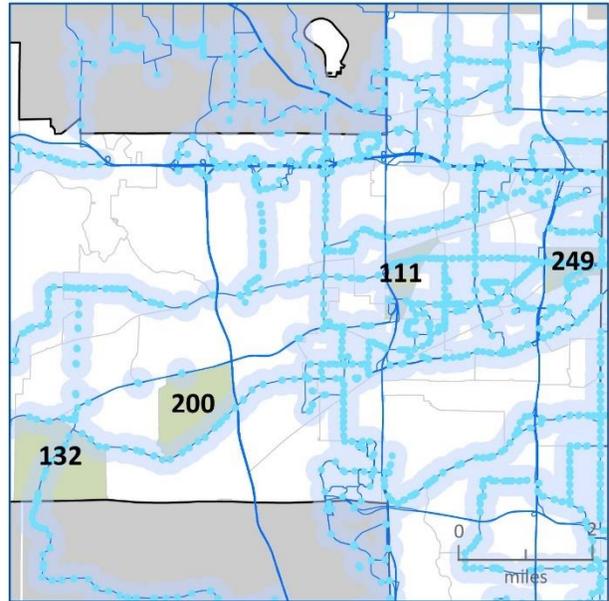
Figure 13

Proximity of LEP Russian, Polish, and other Slavic language Speakers to Metro Transit Service

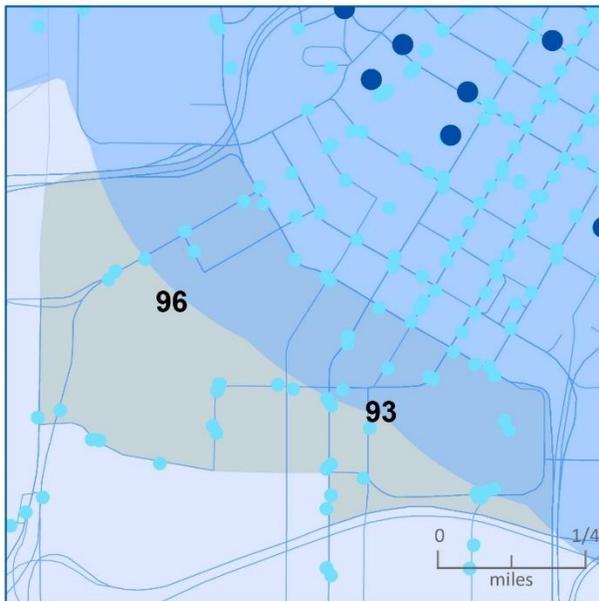
Area A



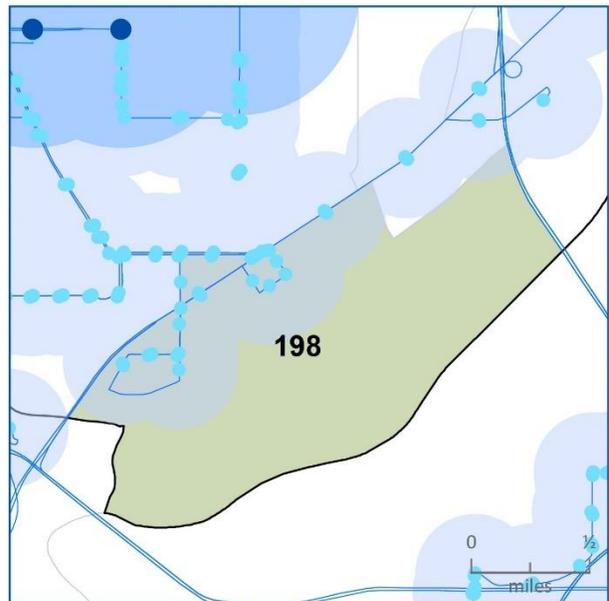
Area B



Area C



Area D



LEGEND

102

Census tract where population is greater than 3% LEP
 Count of LEP speakers



Transitway station



Bus stop



Transit route



1/2-mile buffer - transitway stations



1/4-mile buffer - bus stops



b) Call Center Data

The Metro Transit Call Center tracks its interaction with LEP customer via its partnership with Language Line interpreter services. The following table lists Call Center phone calls by language over the previous 12-month period from August 1, 2018 to July 31, 2019. During that time, the Call Center took 644 total calls from LEP customers seeking interpreter services. The breakdown of those languages is listed below in Table 4:

Table 4: Language Line translation requests (8/2018-7/2019)

Language	Number of Calls
Spanish	539
Somali	62
Amharic	6
Hmong	5
Mandarin	5
Oromo	5
Russian	5
French	4
Arabic	2
Khmer	2
Portuguese	2
Farsi	1
Japanese	1
Karen	1
Swahili	1
Tibetan	1
Tigrinya	1
Vietnamese	1
Total	644

Based on these figures, Metro Transit’s Call Center interacted most commonly with Spanish and Somali speaking LEP customers during this time period. Approximately 84% of all LEP customers in need of language services requested Spanish language interpretation from Language Line. Somali was the next most requested language at almost 10%. On average, the Call Center took approximately 53 calls per month from LEP customers in need of language assistance. Overall, the Call Center utilized Language Line to interact with LEP customers representing 18 distinct languages.

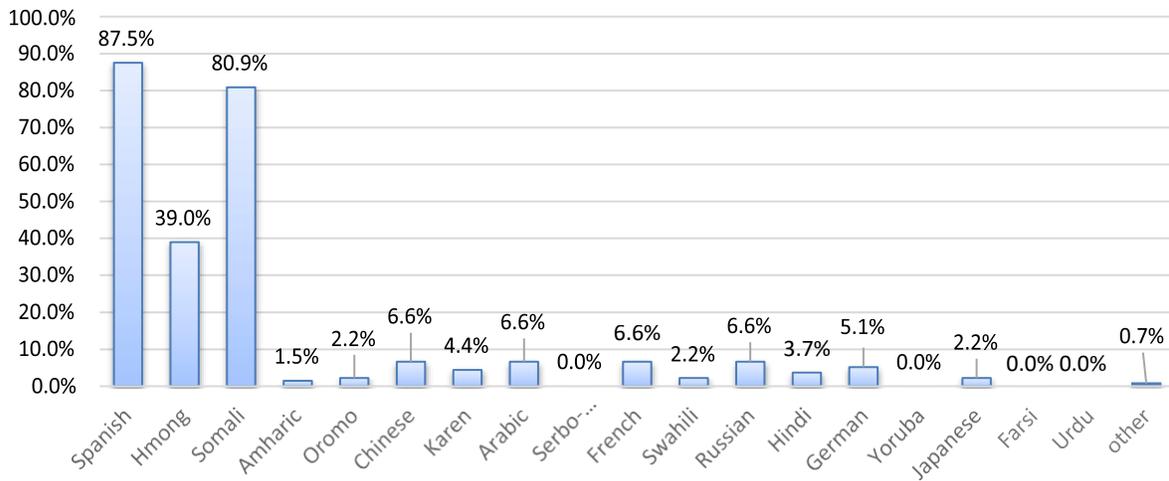
c) *Bus Operator Survey Results*

In July 2016, the Office of Equal Opportunity, designed and administered a survey of Metro Transit operators to better understand the demographics of the LEP population, frequency of use and identify the nature of interactions specific to the LEP population. OEO visited Metro Transit’s 5 bus garages and provided paper copies of bus operator surveys, to which 91 randomly selected operators completed.

The 2016 survey differed from the previous one conducted in 2014 as the survey was self-administered by the operators themselves in printed form. For this reason, percentages for some questions do not add up to one hundred as some respondents chose more than one option and instead reflect the common experiences among bus operators about their interactions with LEP customers. These operators drove a variety of routes (inner city and suburban), were a combination of part or full-time employees, and had varying experiences with understanding foreign languages. As such, the results of this survey are limited by accuracy of the perception of these operators.

Overall, 87.5% of Metro Transit bus operators reported hearing Spanish while driving their current routes. Additionally, 80.9% reported hearing Somali and 39% reported hearing Hmong. Twelve other languages were also reported as being heard on the bus. The breakdown is shown in the chart below:

Figure 13: Reported languages heard by bus operators



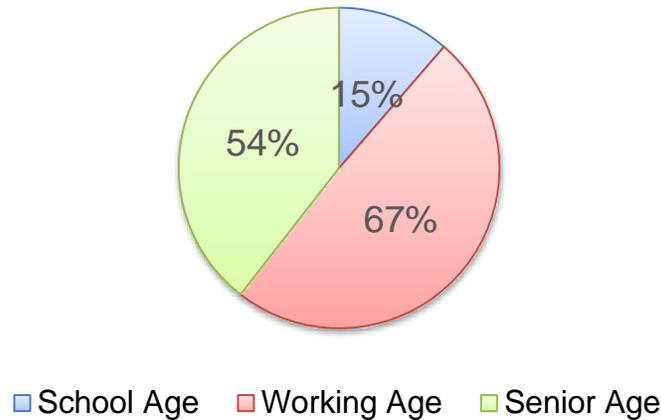
Ninety-five percent (95%) of operators stated they had at least one interaction daily with LEP customers. In terms of LEP customer interactions per shift, the following table shows the frequencies as reported by operators about their current routes:

Table 5: Report daily interactions between bus operators and LEP customers

LEP Interactions (Times/Shift)	Percentage Reported
0	5%
1	12%
2	18%
3	22%
4	12%
5+	31%

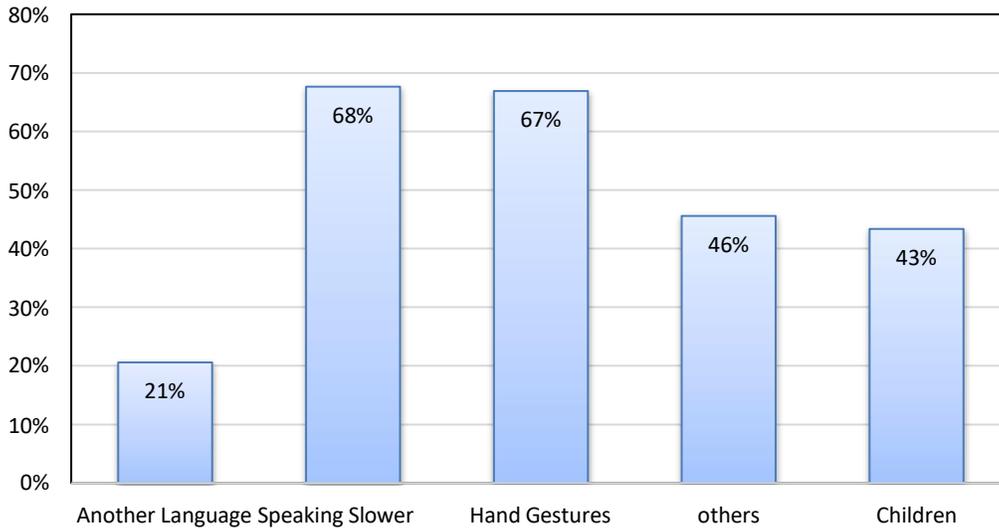
Roughly two-thirds of all operators reported that they interact most with working age LEP customers, while another 54% reported that they have many interactions with senior age LEP customers, and only 15% reported interacting with school age LEP customers (Figure 14).

Figure 14: LEP Interactions by Age Group



The 2016 bus operator survey asked a new question which allowed operators to share how they try to communicate with customers who speak English less than well. Over two-thirds of operators reported speaking slower and using hand gestures as common methods. The graph below identifies other methods used and the frequencies:

Figure 15: Communication Methods



d) Supplemental Information

Metro Transit reached out to several groups in an effort to learn more about which languages are spoken most often in the Twin Cities.

- In the past year, Ramsey County Human Services reported 3,504 client requests for interpretation. Karen translations accounted for 30% of requests. Other common client languages were Hmong (21%), Somali (13%), Spanish (11%), and Amharic (5%). They report there are very few if any clients who request Chinese or Russian translation services.
- In the past year, Hennepin County Human Services reported 47,821 telephonic translation requests through Language Line. Half (50%) of requests were for Somali, followed by Spanish (35%) and Hmong (5%). Russian was requested for 2% of calls, and Mandarin Chinese was requested for less than 1% of calls.
- The International Institute of Minnesota and Hmong American Partnership are among the leading providers of English language classes in the region. They reported 975 students enrolled in English classes in 2019. Six languages are spoken by 54% of students: Somali has the most speakers (21%), followed by Spanish (8%), Amharic (7%), Oromo (7%); Karen (6%), and French (5%). Mandarin Chinese speakers accounted for 2% of students, and Russian speakers accounted for 1% of students.

e) *Metro Mobility*

Metro Mobility management and staff report that contact with LEP persons is very infrequent. Staff reported that they rarely (less than ten times per month) need to use Language Line with potential customers. Metro Mobility provides interpreter and translation services upon request. Over the past year, Metro Mobility staff reported that the department utilized interpreters to assist clients with the intake interview process approximately once per month. However, three quarters of those interactions involve using American Sign Language interpreters.

f) *Transit Link Call Center Information*

Transit Link Call Center staff reported anecdotal information on their interaction with LEP customers. Overall, staff reported that the majority of the Call Center's volume comes from English speakers. When non-native English speakers contact the Call Center, Spanish is the most common language spoken by the customer.

Call Center staff use Language Line to facilitate interactions with LEP customers that speak a language other than English or Spanish.

C. *Nature and Importance of Transportation Services for LEP Customers*

Many LEP persons rely on public transportation for their mobility needs. According to U.S. Department of Transportation LEP guidance, "providing public transportation access to LEP persons is crucial. An LEP person's inability to utilize effectively public transportation may adversely affect his or her ability to obtain health care, education, or access to employment."

Metro Transit is committed to translating vital documents into languages where LEP speakers make up over 5% of the total LEP population in the service area. These languages are Spanish, Somali, Hmong, Karen, and Vietnamese.

Metro Transit identified over 1,000 LEP Chinese speakers living near transit, primarily near the University of Minnesota's Minneapolis and St. Paul campuses. International students may not consider themselves to speak English "very well" but they are required to demonstrate command of the English language to be admitted. Similarly, over 1,000 LEP speakers of Russian, Polish, and other Slavic languages reside near transit. Within this language classification, Russian is most prevalent in the service area.

Data from Language Line and operator surveys demonstrate that LEP Russian and Chinese speakers have a relatively low level of interaction with Metro Transit services. These LEP populations also have lower rates of interaction with other services provided by Hennepin County, Ramsey County, the International Institute of Minnesota, and the Hmong American Partnership. This suggests that translating vital documents into Chinese or Russian would not meaningfully enhance access to Metro Transit services. Therefore, there are no plans to translate vital documents into Chinese or Russian. However, translation of transit-route level materials will be considered as appropriate.

Further review of smaller LEP communities does not show more than 1,000 LEP persons living near transit that speak Arabic, Korean, or French. Data collected from Language Line usage, bus operator surveys and other supplemental information, provide further evidence that vital document translation for these languages would not meaningfully enhance access to service. Therefore, there are no plans to translate all vital documents into these languages. However, translation of transit route-level materials will be considered as appropriate.

D. Resources Available & the Costs of Providing Language Assistance Services

The principal resources available to the Council's Transportation services for providing language assistance to LEP customers are Metro Transit's website, fare machines located at various transit centers, its customer service phone lines, translated materials, and its Customer Advocate program.

1. Metro Transit Website

Metro Transit provides translated content in Spanish, Somali, Hmong, Vietnamese and Karen at metrotransit.org/languages. Each language sub-page contains translated information that directs users to Language Line resources, gives how-to-ride details, provides fare information, contains information about the Title IV complaint process and has links to vital documents. Google Translate is available to translate other pages of the Metro Transit site.

2. Fare Machines

Fare machines on Blue and Green Light Rail Line stations offer customers the option of selecting Spanish, Hmong, or Somali (the three most commonly used languages besides English) for purchasing fares.

3. Interpretation Services

Metro Transit's Call Center staff uses Language Line to facilitate phone interactions with LEP customers. Language Line can provide language interpretation services for over 170 different languages. In addition, Metro Transit also offers, upon request, interpreters for community meetings.

4. Translated Materials

Metro Transit provides documents and information that are translated into Hmong, Spanish, Somali, Vietnamese and Karen. These documents include fare product, user guides, safety brochures, translated page referral cards, etc. Metro Transit has also provided translated direct mailings in other languages like Nepali— for specific groups which may be impacted by changes to particular routes. Metro Transit also offers translations of documents upon request. Please see Attachments for samples of translated documents.

Transit Information led usability testing in 2015-2016 that included interviews with LEP participants to evaluate the usability of Metro Transit information materials. These materials included Rider Alerts, shelter schedules, pocket schedules, and bus stop signs. The interview

results informed the redesign of transit information materials.

Metro Transit also incorporates Universal Design principles into transit information to improve access for LEP persons and those without first-language literacy. Where materials are less suitable for translation (e.g. bus stop signs), materials are designed to reduce text to plain English and convey information through icons and images.

5. Customer Advocates

Metro Transit Customer Advocates provide free presentations and personalized how-to-ride classes addressing topics such as: fares and how to pay them, trip planning, reading maps and schedules, using the Metro Transit website, accessibility, etc. This is a customizable training that is adapted to meet the needs of a range of unique customer groups including LEP populations. Metro Transit helps make these workshops linguistically accessible to LEP populations by partnering with the requesting community group, which often provides interpretation services.

These services involve a number of technological and personnel costs, which are distributed among Metro Transit's operations. Metro Transit is committed to assuring that these and other resources are used to reduce the barriers that limit access to its information and services by LEP persons. Where applicable, Metro Transit will provide funds to enhance its language services.

6. Operator Language Classes

Metro Transit offered language classes to operators between 2015 and 2017. Of the operators surveyed, 5% have taken the language courses and, of that group 80% found that the class met their expectations and 90% were able to use the Spanish they learned on the job. Operators also expressed that multi-lingual skills among operators would help better serve LEP transit customers.

While operators expressed interest in language classes, scheduling sessions was challenging and attendance among participants was inconsistent. In response, Metro Transit began work on creating a Basic Transit Spanish online course. The online course has no scheduled sessions, which will improve access for operators seeking to build language skills on their own time. When the course launches, it will emphasize vocabulary and phrases specific to transit (e.g. fares and directions).

7. Additional Services

The Council's 2017 Title VI plan identified several additional services and efforts needed in order to provide meaningful access to its transportation services for LEP customers. The list of services and efforts are reproduced and updated:

- Centralizing LEP implementation and monitoring in a single Department
 - Update: Title VI and LEP implementation and compliance are now housed in the Council's Office of Equal Opportunity (OEO). The Council has several departments and divisions and outreach units that interact with LEP populations. OEO staff routinely work with these staff members to help ensure the Council's Title VI obligations are met.
- Focusing more resources on the languages used by the largest LEP communities in the

Council's Transportation area (Spanish, Hmong, Somali, Vietnamese and Karen)

- Update: Ongoing. Examples include providing translated content in these five languages at metrotransit.org/languages. Each language sub-page contains translations of all vital documents and information. Google Translate is available to translate other pages on the Metro Transit site.

- Expanding the use of telephone interpreter services
 - Update: Ongoing. Metro Transit is researching opportunities to improve Language Line in order to increase its use by LEP customers.

- Expanding outreach to community organizations and entities that work directly with LEP customers to better understand the transit and language needs of LEP populations
 - Update: Ongoing. Metro Transit's Customer Advocates continue their work in reaching out to community organizations, schools, and other entities that work with LEP populations. In 2016, Metro Transit hired a third Customer Advocate to help with this work. In addition, Metro Transit significantly expanded its Outreach and Public Involvement unit from 1 staff person to 5. These added resources facilitate Transit's ability to reach more customers generally, including those with limited English proficiency.

- Increase the Council's internal bilingual capabilities by identifying and certifying bilingual employees to provide oral language assistance as needed
 - Update: Ongoing. Metro Transit enlists current employees to help with outreach activities in communities of color. Many of these employees and communities speak languages other than English. For example, in July 2016, several Hmong-speaking Metro Transit bus operators participated in the Hmong Freedom Festival.

V. Current Language Assistance Measures

DOT Guidance: *“An effective LEP plan would likely include information about the ways in which language assistance will be provided.”*

Based on the four-factor analysis above, the most predominant languages spoken by LEP persons in the Metro Transit, Metro Mobility, and Transit Link services areas are Spanish, Hmong, Somali, Vietnamese and Karen. The Council most frequently encounters Spanish speaking commuters. In addition, Metro Transit is the Council’s most widely used transportation service. As a result, the Council focuses the majority of its LEP resources on Metro Transit and provides its most robust language assistance services in Spanish primarily, followed by Hmong, Somali, Vietnamese and Karen. However, the Council continues to make language assistance for other languages available on an as-needed basis.

Metro Transit uses a variety of strategies to provide language assistance for LEP customers, including:

- A variety of translated materials, including Title VI Notice of Rights, Title VI complaint forms, application and intake forms for reduced fare programs, fare information and user guides, notices of the availability of interpretation services and various marketing materials. Please see Attachment 2s for samples of translated materials.
- Ticket Vending Machines (TVMs) that offer customers the option of selecting Spanish, Hmong, or Somali translations for purchasing fares.
- Language Line phone services to facilitate interactions between LEP customers and Metro Transit customer service staff. Language Line can provide language interpretation services for over 170 different languages.
- Interactive Voice Response (IVR) system offers automated messages in Spanish to LEP customers calling Metro Transit’s general phone line for transit trip information and Go-To card services.
- Translations, available upon request, of all public documents and meeting materials presented at community/outreach meetings.
- Interpreters, available upon request, for community/outreach meetings.
- Outreach and educational workshops by Metro Transit Customer Advocates offering personalized and linguistically accessible how-to-ride classes to groups throughout Metro Transit’s service area.
- A website that contains a subsection of basic how-to-ride content translated into Spanish, Somali, Hmong, Vietnamese and Karen.
- Monitoring staff interactions with LEP customers in order to identify potential areas of need for language assistance.
- Administering bus operator surveys to identify the frequency and nature of contact LEP customers have with bus operations.

- Advertising its services via radio and television to communities that speak languages other than English.
- Ongoing partnership between Metro Transit's Transit Information Center (TIC) and the International Institute of Minnesota (IIMN) to provide Bus Buddies, a program that pairs TIC representatives with recent immigrants on transit rides to and from IIMN's location in St. Paul.

Metro Mobility uses several strategies to provide language assistance for LEP customers, including:

- Basic information about Metro Mobility, along with vital documents, is provided at metromobility.org/translations in Spanish, Somali, Hmong, Vietnamese and Karen.
- Language Line phone services to facilitate interactions between LEP customers and Metro Mobility customer service staff.
- Translations, available upon request, of all public documents and meeting materials presented at community/outreach meetings.
- Interpreters, available upon request, for community/outreach meetings.
- Monitoring staff interactions with LEP customers in order to identify potential areas of need for language assistance.

Transit Link uses several strategies to provide language assistance for LEP customers, including:

- Basic information about Transit Link, along with vital documents, is provided at transitlinktc.org/translations in Spanish, Somali, Hmong, Vietnamese and Karen.
- Interpreters, available upon request, for community/outreach meetings.
- Monitoring staff interactions with LEP customers in order to identify potential areas of need for language assistance.
- Language Line phone services to facilitate interactions between LEP customers and Metro Transit customer service staff. Language Line can provide language interpretation services for over 170 different languages.
- Spanish/English bilingual staff.

VI. Current LEP Outreach

The principle resources available to Metro Transit for LEP outreach are the Metro Transit website, its customer service phone line, its Customer Advocate program, and translated documents.

A. *Metro Transit Webpage*

Metro Transit provides translated content in Spanish, Somali, Hmong, Vietnamese and Karen at metrotransit.org/languages. Each language sub-page contains translated information that directs users to Language Line resources, gives how-to-ride details, provides fare information, contains information about the Title IV complaint process and has links to vital documents. This section also has a Google Translate feature to assist speakers of other languages.

Similarly, basic translated content is available for Metro Mobility users at metromobility.org/translations and for Transit Link at transitlinktc.org/translations.

B. *Language Line*

The public, including LEP customers, can contact Metro Transit's Call Center. Metro Transit utilizes Language Line to provide phone interpreters for LEP customers who wish to speak with a Call Center representative. Language Line provides interpretation services in over 170 languages.

C. *Advertising with Multilingual Media*

Metro Transit has also advertised its services with multilingual media. For example, Metro Transit produced translated print, bus, and radio and TV ads promoting transit information; Spanish radio promoting operator hiring; and translated posters communicating the role of Metro Transit police officers.

D. *Customer Advocates*

Metro Transit Customer Advocates provide free presentations and personalized how-to-ride classes to groups throughout Metro Transit's service area. During these classes, Customer Advocates teach groups a number of things including:

- Fares and how to pay them
- Planning a trip
- Reading maps and schedules
- Transfers / Using Park & Ride lots
- Metrotransit.org and online tools
- Accessibility
- Safety
- Mock calls to practice using Language Line
- Other topics

In addition to these presentation topics, Customer Advocates often bring a Metro Transit bus to the meeting site and have the group practice buying their fare, requesting a transfer, finding their seat, using the pull-cord signaling system, and taking a practice ride where they learn to identify bus stops. Customer Advocates also hold classes on light rail vehicles where customers experience a trip and learn about safety and the various amenities available on each rail car.

This training can be customized to address specific issues and can be adapted to meet the needs of job seekers, those with disabilities, English language learner (ELL)/LEP populations, seniors, community groups and schools of all ages. Metro Transit helps make these workshops linguistically accessible through a variety of strategies. For example, one of the Customer Advocates is a native Spanish speaker. In addition, Customer Advocates partner with the requesting community group, which provides interpretation services.

Metro Transit Customer Advocates have a broad network of partner organizations that extends to approximately 90 organizations that each serve particular groups of LEP, ELL, or English as a Second Language learners. This network is constantly growing as more partnerships are established.

Since the last Title VI update, Metro Transit's Customer Advocates provided trainings to over 40 groups that serve LEP customers. In total, our Customer Advocates estimate that they have reached hundreds of LEP customers through this outreach.

VII. Future Strategies to Better Serve LEP Customers

The Office of Equal Opportunity (“OEO”) will continue to lead LEP initiatives for the Council to better coordinate how Metro Transit, Metro Mobility, and Transit Link serve their LEP customers. In addition, OEO will continue collaborating with sub-recipients to ensure they comply with Title VI and LEP.

OEO has helped coordinate several working groups, consisting of various Council and Metro Transit staff. These groups help explore options, resources, and opportunities for complying with Title VI. The Council’s continuing LEP efforts will include the following:

- Adding Karen and Vietnamese translations for ticket purchases at all Ticket Vending Machines.
- Surveying operators to assess how LEP customers interact with the Council and its services;
- Coordinating with Metro Transit to explore additional strategies for gathering data on the interactions between LEP customers and Transit staff;
- Collaborating with other Council divisions to collect data on Language Line usage by particular language, frequency, and services provided;
- Revising the language services, as appropriate, that the Council and its divisions offer in order to provide LEP customers with meaningful access to its services;
- Collaborating with community groups that serve LEP populations to understand the linguistic needs of these communities;
- Working with Metro Transit’s Service Development and Council planners to monitor demographic changes in our service areas to determine if additional language assistance measures are needed;
- Creating meaningful outreach by using multi-lingual employees as ambassadors to community organizations that represent LEP communities;
- Including transit information that is translated into Hmong, Somali, Vietnamese, and Karen as part of its phone messaging system;

The Council, Metro Transit, Metro Mobility, and Transit Link are committed to assuring that resources are used to reduce the barriers that limit access to its information and services by LEP persons. Where applicable, the Council will provide funds to enhance its language services.

VIII. Staff Training

According to LEP guidance provided by the USDOT, “Staff members should know their obligations to provide meaningful access to information and services for LEP persons, and all employees in public contact positions should be properly trained.”

Metro Transit and Metro Mobility provide basic training for employees at their respective Call Centers for utilizing the services of Language Line to help facilitate meaningful interactions with LEP customers. In addition, Metro Transit and OEO developed languages classes for various public-facing personnel. These include Transit-related Spanish language classes for bus operators that drive through Spanish speaking areas of the region. Language classes were held from 2015 to 2017, but they were discontinued due to scheduling and attendance challenges. Current efforts are underway to implement language classes in an online format. Furthermore, Metro Transit Police offered Spanish classes to Police Officers to help them interact with Spanish speaking customers. These courses will have expanded to include Somali instruction for Police Officers, and Spanish courses for operators in additional locations. Additional LEP training is given to employees on a case-by-case basis based on employee, supervisor, and customer feedback.

IX. Monitoring & Updated the Language Assistance Plan

The Council conducts internal monitoring of its language assistance practices to ensure that the strategies employed remain effective. This is accomplished partially through feedback from Metro Transit, Metro Mobility, and Transit Link Call Center staff and from Metro Transit bus operators who help identify the LEP populations with whom they come in frequent contact.

The Council is committed to continuously improving its Language Assistance Plan. To that end, the company will revise the plan with more appropriate strategies as needed. Additionally, the Council, Metro Transit, Metro Mobility, and Transit Link will assess the viability and cost-effectiveness of pursuing and implementing new technologies and language assistance strategies as they become available.

X. Executive Summary

A. Background

On October 1, 2012, the United States Department of Transportation (DOT) published revised guidance for its recipients on the Implementation of Executive Order 13166, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients." This document reiterates the requirement that FTA funded recipients take responsible steps to ensure meaningful access to benefits, services, and information for LEP persons and suggests that FTA recipients and sub-recipients. This requirement includes the following analysis:

- Identifying the number or proportion of LEP persons served or encountered in the recipient's service area;
- Determining the frequency with which LEP individuals come into contact with the recipient's services;
- Determining the nature and importance of the services to LEP people; and
- Assessing the current resources available and the costs to provide Language Assistance Services.

Recipients and sub-recipients must then develop a language implementation plan consistent with the provisions of Section VII of the DOT LEP Guidance. The following information summarizes the Council, Metro Transit, Metro Mobility, and First Transit's LEP analysis and Language Assistance Plan.

B. Demographic Data

The Council's Four Factor analysis revealed the following demographic information in the Metro Transit service area:

- **2,118,088** – Total population in Metro Transit service area
- **7.2% (153,549)** – LEP individuals in service area
- **33.0% (50,622)** – Spanish speakers out of total LEP individuals in service area

The most frequently spoken languages (other than English) in the Metro Transit service area are listed below:

Language	Number of LEP Speakers	Pct. of Total LEP Population	Pct. of Total Population
Spanish	50,622	33.0%	2.4%
Other Asian and Pacific Island languages (incl. Hmong and Karen)	39,657	25.8%	1.9%
Other or unspecified languages (incl. Somali)	28,782	18.7%	1.4%
Vietnamese	8,785	5.7%	0.4%
Chinese	6,449	4.2%	0.3%
Russian, Polish, and other Slavic languages	5,829	3.8%	0.3%

Further analysis indicates that:

- LEP Spanish speakers are more widely dispersed than other language groups, being located in both urban & suburban communities.
- LEP speakers of “Other Asian and Pacific Island languages” (i.e., Hmong and Karen) reside in north Minneapolis, in St Paul along University Avenue and the East Side, and also in suburbs in the north and northwest metro.
- LEP Vietnamese speakers are located in the north and northwest areas of the metro, and are also located along University Avenue in St Paul.
- LEP speakers of “other or unspecified languages” are scattered across the service area but are mainly located in the central area Minneapolis and along University Avenue in St Paul. Somali is the most prevalent language within this classification.

C. Metropolitan Council Data

Metro Transit Call Center data and Bus Operator surveys support the conclusion that Metro Transit interacts most commonly with LEP individuals who speak Spanish, Hmong, and Somali. For example, over the last year, the Call Center took 644 total calls from LEP customers seeking interpreter services. The breakdown is listed below:

Language	Number of Calls
Spanish	539
Somali	62
Amharic	6
Hmong	5
Mandarin	5
Oromo	5
Russian	5
French	4
Arabic	2
Khmer	2
Portuguese	2
Farsi	1
Japanese	1
Karen	1
Swahili	1
Tibetan	1
Tigrinya	1
Vietnamese	1
Total	644

In Summer 2016 OEO administered bus operator surveys to better understand the frequency and nature of the interactions between Metro Transit and the service area's LEP population. Operators noted that Spanish, Somali, and Hmong were the most commonly heard language on buses. They also made several observations:

- **95%** of operators reported interacting daily with LEP customers
- **67%** of operators most frequently encountered working age LEP customers
- **57%** of operators cited bus fare as the most common question for LEP riders

D. Current Language Assistance Measures

Metro Transit, Metro Mobility, and First Transit, use several strategies to provide language assistance to LEP customers, including:

- Ticket Vending Machines (TVMs) that offer Spanish, Hmong, or Somali translations for purchasing fares;
- Language Line Call Center phone services, offering interpretation services in 170 different languages;
- Interactive Voice Response (IVR) system offers automated messages in Spanish to LEP customers calling Metro Transit's general phone line;
- Translations, available upon request, of all public documents and meeting materials presented at community/outreach meetings;
- Interpreters, available upon request, for community/outreach meetings;
- Outreach and educational workshops by Metro Transit Customer Advocates offering personalized and linguistically accessible how-to-ride classes to groups throughout Metro Transit's service area;
- A variety of translated materials providing information on resources, fare products, user guides, etc. Please see Attachments for samples of translated materials;
- A website with content that has been translated into Spanish, Hmong, Somali, Vietnamese and Karen;
- Advertising its services via radio and television to communities that speak languages other than English.

E. Future Strategies to Better Serve LEP Customers

The Council, Metro Transit, Metro Mobility, and Transit Link will explore the following strategies to continue providing meaningful access to LEP commuters:

- Adding Karen and Vietnamese translations for ticket purchases at all Ticket Vending Machines.
- Continuing survey work to assess how LEP customers interact with the Council;
- Continuing to coordinate Title VI working groups composed of Council staff to facilitate Title VI implementation, including LEP efforts;
- Revising language services as appropriate;
- Collaborating with community groups serving LEP populations to understand the linguistic needs of these communities;
- Creating meaningful outreach by using multi-lingual employees as ambassadors to community organizations that represent LEP communities;
- Continuing outreach with Customer Advocates;

F. Monitoring & Updating the Language Assistance Plan

The Council is committed to continuously improving its Language Assistance Plan. To that end, the company will revise the plan with more appropriate strategies. These may include future bus operator trainings and resources. Additionally, the Council, Metro Transit, Metro Mobility, and Transit Link will assess the viability and cost-effectiveness of pursuing and implementing new technologies and language assistance strategies as they become available.

XI. Attachments

The following attachments are samples of translated documents created for LEP transit customers.

A. Title VI Notice – Vehicle Interior Card

Spanish, Somali, Hmong, Karen, and Vietnamese translations of customer rights under Title VI. This notice is posted inside Metro Transit buses and light rail vehicles.

YOUR RIGHTS UNDER TITLE VI

The Metropolitan Council operates its services and programs without regard to race, color or national origin. Contact us to file a discrimination complaint, or to learn more about Title VI obligations.

Metropolitan Council waxay adeegyadeeda iyo barnaamijyadeeda ku fulisaa iyadoo aan la eegayn jinsi, midab iyo asal qaran. Nala soo xariir si aad u xarayso cabashada la xarirta faa'iidada, ama si aad wax badan uga ogaato waxyaabo ku saabsan waajibaadyada Title VI.

El Metropolitan Council opera sus servicios y programas sin distinción de raza, color u origen nacional. Comuníquese con nosotros para presentar una queja por discriminación o para obtener más información sobre las obligaciones de Title VI.

Metropolitan Council (Hội Đồng Thành Phố) điều hành các dịch vụ và chương trình của mình mà không phân biệt đối xử dựa trên chủng tộc, màu da hay nguồn gốc quốc gia. Hãy liên lạc với chúng tôi để nộp khiếu nại về hành vi phân biệt đối xử hoặc để tìm hiểu thêm về các quy định của Tiêu Múc VI.

Lub koom haum Metropolitan Council yuav khiav lawv cov kev pab cuam thiab kev pab yam tsis xam txog leej twg haiv neeg, thiab teb chaws yug. Hu cuag pab kom ua ntaub ntawv tsis txaus siab, los sis yog xav paub ntxiv txog cov tes dej num ntawm boj cai Title VI.

Office of Equal Opportunity
390 Robert Street
St. Paul, MN 55101

612-373-3333 | metrocouncil.org
TitleVIComplaints@metc.state.mn.us



a service of the Metropolitan Council

12/14/2018

B. Better Bus Routes – Route 63 Improvements Brochure

Spanish, Somali, and Hmong translations for a brochure announcing proposed improvements on Route 63.

Proposed bus stop changes to Route 63



Interested in the project?
We'd like to hear your thoughts.

Upcoming open houses:

Tuesday, Nov. 19, 5-6:30 p.m.
Harding High School
1560 6th St. E., St. Paul

Thursday, Nov. 21, 5-6:30 p.m.
Macalester College
Theater & Dance Building
130 Macalester St., St. Paul

Contact us anytime at
Service.Development@metrotransit.org
612-373-3333
metrotransit.org/better-bus-routes



BETTER BUS ROUTES

Proposed changes to Route 63!

- » fewer stops, faster travel
- » buses spend more time moving
- » new bus shelters
- » improved access to bus stops
- » more trips




Proposed bus stop changes to Route 63

Better Bus Routes is an initiative to improve your experience riding local bus routes by adding trips, reducing stops, improving accessibility and providing more shelters. These changes, both on and off the bus, will make your trip better, faster and more reliable.

Changes are proposed for summer 2020.

El programa 'Better Bus Routes' (Mejores Rutas de Autobús) es una iniciativa para mejorar su experiencia de viajar en líneas de autobuses locales al aumentar el número de viajes, reducir las paradas, mejorar la accesibilidad y poner al servicio más casetas de resguardo en los paraderos. Estos cambios, tanto dentro como fuera del autobús, harán que su viaje sea mejor, más rápido y más confiable.

Los cambios se proponen para el verano del año 2020.

Waxa la yiraa Jidacka Baasaa ee ficani (Better Bus) waa talaabo lagu bilayo jidacka baasada aad raacdaa ay maraan iyadoo lagu soo darayo baasaa kale, la yareeynayo inta meelood ay baasadu istaagayaan iyo helida iyo hagaajinta gabaasdyo badan. Isbedeladaas lagu sameeynayo baasaska guudkooda iyo dhulkaba waxa ay ka dhigi doonteen safar-raddada kuwa wacan, degdeg ah lana isku halayn karo.

Isbedelada waxaa la soo jeediyey inay dhaqan galaan xagaagga sanadka 2020.

Lub hom phajj Better Bus Routes yooj los txhim kho txoj kev cajj nqav. Xws li ntiv ntau qhov chaw nres ntiv, txo qhov pheaj nres, ua kom yooj yim rai cov xam oob qhab ntog thiab nuaj chaw nraim. Tej kev hloov no yuav pab ua kom txoj kev cajj nqav zoo dua, ceev dua, thiab tao siab dua.

Tej kev hloov pauv no yuav tshwm sim Lub Cajj Ntauj So xyoo 2020.






C. Fare Enforcement Information

Somali translation of Metro Transit Police fare enforcement information.

METRO TRANSIT POLICE

Saraakiisho waxey baaryaan
qiimaha tikitka iyo nabadgalyada
Tareenada iyo Basaska.

IYAGU MA AHAN WAKIILADA LAANTA SOCDAALKA.



D. Route 724 Information Flyer

Customer information flyer for Route 724 translated into Somali.



Baasaska mara wadadda 724 (Route 724) waxay ay ku geyn shaqooyinka galinka hore ama gelinka dambe la galo labadaba.

Metro Transit waxa ay kala shaqeynaysaa Amazon sidii loo sii hagaajin lahaa gadiidka shaqada ku geynaya! Laga bilaabo bisha Maarso 11 keeda, waxa aanu gaarsiin doonaa baaska mara wadada 724 ka ilaa iyo Xarunta cusub ee kala-Soocida ee laga furay Brooklyn Park.

- Safarada u jeeda jahada Waqooyigu waxa ay tagaan Amazon 8:30 subaxnimo iyo 2:02 Duhurnimo. safarada u jeeda jihada Koonfurtuna waxa ay baxaan 1:19 duhurnimo iyo 6:56 fiidnimo.
- Baasaku waxa ay u adeegi doonaan rugaha Starlite Transit Center iyo Brooklyn Center Transit Center. Qaar ka mid basaska oo gaar ahi waxay sidoo kale u adeegi doonaan Waqooyiga Minneapolis (North Minneapolis) iyo bedelka hoose ee Minneapolis (downtown Minneapolis).

Booqo metrotransit.org/route/724 si aad akhbaar buuxda uga hesho.

E. Transit Assistance Program (TAP) Brochure

Informational brochure for Metro Transit's Transit Assistance Program (TAP) translated into Vietnamese.



Sử dụng thẻ TAP của quý vị

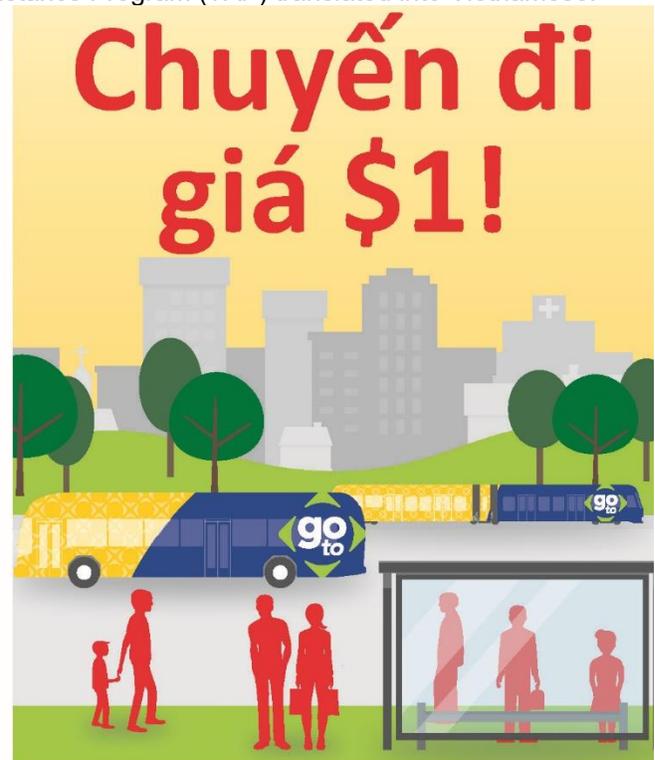
Thẻ Go-To có vé TAP có tất cả các lợi ích giống như Thẻ Go-To – như tích lũy chuyển đổi và bảo toàn số dư. Các hành khách có quyền sử dụng giá vé \$1 trong cả năm sau lần sử dụng đầu tiên. Giá chiết khấu không hợp lệ đối với các xe buýt Metro Mobility hoặc Transit Link và chỉ giảm giá một phần cho giá vé Northstar. Khách hàng có thể gia hạn vé TAP sau một năm nếu vẫn đủ điều kiện.

Mẹo Nhanh

Nếu quý vị mất hoặc bị trộm vé:
Hãy liên hệ bộ phận Quan Hệ Khách Hàng theo số 612-373-3333.

Nếu vé của quý vị không hoạt động:

Thanh toán tiền vé của quý vị bằng tiền mặt và liên hệ với quản trị viên chương trình của nhà cung cấp dịch vụ của quý vị để yêu cầu vé thay thế. Kiểm tra ngày hết hạn. Thẻ Go-To TAP của quý vị chỉ dùng được trong một năm nên quý vị có thể cần phải đăng ký lại.



Khách hàng có thể đủ điều kiện được giảm giá vé thông qua Chương Trình Hỗ Trợ Chuyển Tuyến (Transit Assistance Program, TAP)

Tìm hiểu thêm tại metrotransit.org/TAP



612-373-3333
metrotransit.org

06-22-65719-19



Đi xe tốn \$1 với Chương Trình Hỗ Trợ Chuyển Tuyến (TAP)

Chương Trình Hỗ Trợ Chuyển Tuyến (TAP) được thiết kế để giúp dịch vụ chuyên chở công cộng có giá cả phải chăng hơn cho cư dân có thu nhập thấp hơn. TAP cung cấp vé giảm giá trên Thẻ Go-To. Loại vé này cho phép khách hàng sử dụng xe buýt hoặc tàu chỉ với giá \$1 mỗi chuyến – ngay cả trong giờ cao điểm – có chuyển tuyến 2½ tiếng.

Đăng ký rất dễ dàng!

Đăng ký trực tuyến hoặc trực tiếp

Trực Tuyến

metrotransit.org/tap-enrollment-form

Điền vào đơn. Tải lên ảnh quét hoặc ảnh chụp thẻ ID của quý vị và giấy tờ được chấp nhận. Sau khi được chấp thuận, thẻ của quý vị sẽ được gửi qua đường bưu điện trong khoảng một tuần.

Trực Tiếp

Mang thẻ ID của quý vị các giấy tờ được chấp nhận tới một Cơ Sở Dịch Vụ Chuyên Chở để nhận được thẻ ngay.

Minneapolis Metro Transit Service Center
719 Marquette Avenue, Minneapolis
7:30 a.m. - 5:30 p.m.

St. Paul Metro Transit Service Center
US Bank Center Skyway
101 E. 5th Street, St. Paul
9 a.m. - 4:30 p.m.

SouthWest Transit Station
13500 Technology Drive, Eden Prairie
6:30 a.m. - 6:30 p.m.

Burnsville Transit Station
100 Highway 13, Burnsville
8 a.m. - 4:30 p.m.

Sự Kiện Ghi Danh

Nhân viên của Metro Transit có mặt tại địa điểm để ghi danh khách hàng và phát Thẻ Go-To TAP. Để biết ngày và địa điểm, hãy truy cập metrotransit.org/tap-enrollment-events.

Đối Tác Phân Phối TAP

Ngày càng có nhiều cơ quan có thể xác minh giấy tờ và phân phối Thẻ Go-To TAP.

Giấy tờ được chấp nhận

Trình thẻ ID có ảnh hoặc hóa đơn sử dụng có tên và địa chỉ của quý vị và một tài liệu xác minh để cho thấy rằng quý vị đáp ứng được các nguyên tắc về thu nhập.

Hãy truy cập metrotransit.org/tap để xem danh sách đầy đủ các giấy tờ được chấp nhận hoặc gọi tới số 612-373-3333.

Tài Liệu Được Chấp Nhận Mẫu



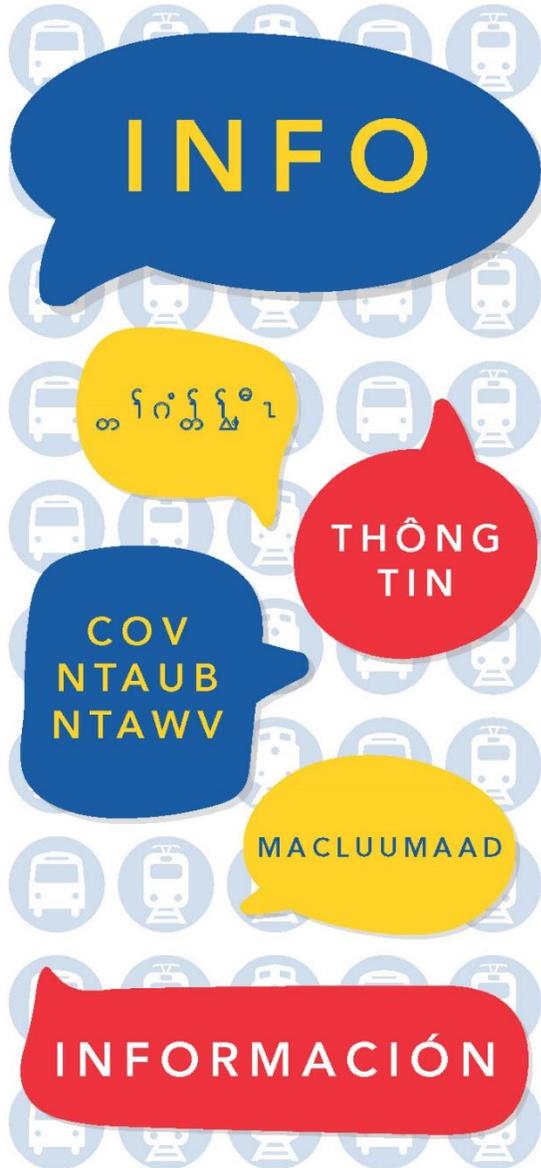
Nạp tiền vào thẻ TAP của quý vị

Sau khi được chấp thuận, Metro Transit sẽ thêm chiết khấu TAP cho Thẻ Go-To mới hoặc thẻ hiện có của quý vị – sau đó quý vị chỉ cần nạp giá trị và sử dụng!

- Trực tuyến tại metrotransit.org bằng thẻ tín dụng
- Qua điện thoại theo số 612-373-3333 bằng thẻ tín dụng
- Qua đường bưu điện bằng thẻ tín dụng hoặc séc. Hãy gọi tới 612-373-3333 để nhận mẫu đặt hàng qua đường bưu điện
- Tại máy bán vé tàu bằng tiền mặt hoặc thẻ tín dụng
- Tự động bằng thẻ tín dụng. Đăng ký tại metrotransit.org/AutoRefill

F. Translation Information Buckslip

Buckslip advertising translated transit information available by phone and on Metro Transit's website at www.metrotransit.org/languages.



metrotransit.org/languages
612-373-3333



**ATTACHMENT F: MINUTES NOTING
METROPOLITAN COUNCIL APPROVAL
OF TITLE VI POLICIES**

Metropolitan Council

Council Chair Susan Haigh
Councilmember Roxanne Smith
Councilmember Lona Schreiber
Councilmember Gary Van Eyll
Councilmember Jennifer Munt

Councilmember Steve Elkins
Councilmember James Brimeyer
Councilmember Gary Cunningham
Councilmember Adam Duininck

Councilmember Edward Reynoso
Councilmember John Đoàn
Councilmember Sandy Rummel
Councilmember Harry Melander

Councilmember Richard Kramer
Councilmember Jon Commers
Councilmember Steven Chávez
Councilmember Wendy Wulff

Meeting Minutes

Wednesday, June 26, 2013

4:00PM

Council Chambers

IN ATTENDANCE

Smith, Munt, Van Eyll, Elkins, Brimeyer, Cunningham, Duininck, Reynoso, Đoàn, Rummel, Melander, Kramer, Commers, Chávez, Wulff

CALL TO ORDER

A quorum being present, Vice Chair Melander called the meeting to order.

APPROVAL OF AGENDA AND MINUTES

Vice Chair Melander made a motion to amend the meeting agenda by removing the Reports at the end. It was moved by Cunningham, seconded by Reynoso to accept the meeting agenda as amended.

It was moved by Elkins, seconded by Van Eyll.

REPORT OF THE MANAGEMENT COMMITTEE

1. 2013-156 Authorize the amendment of the 2013 Unified Operating Budget as indicated and in accordance with the attached tables.

It was moved by Brimeyer, seconded by Rummel

Motion carried on the following roll call vote:

Aye: 15—Smith, Munt, Van Eyll, Elkins, Brimeyer, Cunningham, Duininck, Reynoso, Đoàn, Rummel, Melander, Kramer, Commers, Chávez, Wulff

Nay: 0

Absent: 2—Schreiber, Haigh

JOINT REPORT OF THE MANAGEMENT, ENVIRONMENT, TRANSPORTATION, AND COMMUNITY DEVELOPMENT COMMITTEES

1. 2013-157 Amend the 2013 Unified Capital Program as indicated and in accordance with the attached tables.

It was moved by Cunningham, seconded by Chávez

Motion carried on the following roll call vote:

Aye: 15—Smith, Munt, Van Eyll, Elkins, Brimeyer, Cunningham, Duininck, Reynoso, Đoàn, Rummel, Melander, Kramer, Commers, Chávez, Wulff

Nay: 0

Absent: 2—Schreiber, Haigh

CONSENT AGENDA

Approval of the Consent Agenda (Items 1-9)

Consent Agenda Adopted

1. 2013-161 Authorize the Regional Administrator to negotiate and execute a new Transit Cooperation Agreement with the City of Minnetonka.
2. 2013-162 Authorize the Regional Administrator to negotiate and execute Amendment #1 to Subordinate Funding Agreement #21 with the Minnesota Department of Transportation (MnDOT), in an amount not to exceed \$550,000, for reimbursement of costs incurred by the Council for Construction services related to the Blue Line (Hiawatha) Extension.
3. 2013-167 Authorize the Regional Administrator to negotiate and execute a professional services contract with Acentech to perform vibration testing and monitoring services measuring Light Rail Transit-generated vibration at the University of Minnesota, Hubbard Broadcasting, and Minnesota Public Radio (MPR) as part of pre-revenue service and during the first year of revenue service for the Central Corridor (Green Line) Light Rail Transit (CCLRT) Project in an amount not to exceed \$675,000.
4. 2013-168 Approve MnDOT's request to construct a new I-35E MnPASS lane from I-94 to Little Canada Road conditional upon any significant changes in the design of the proposed project being subject to further review and approval by the Metropolitan Council prior to construction.
5. 2013-170 Authorize the Regional Administrator to enter into a collective bargaining agreement with the United Association of Pipefitters, Local Union No. 455, effective for the period of May 1, 2013—April 30, 2016.
6. 2013-171 Authorize the Regional Administrator to amend Contract 11P032A with Taxi Services Inc. for an additional \$550,000 for an amended total contract amount of \$2,096,000; and extend the term of the agreement from July 1, 2013 to December 31, 2013.
7. 2013-172 Pass Resolution 2013-6 that authorizes the acquisition of permanent/temporary easements necessary for the Seneca Interceptor System Rehabilitation, Project 808000; and authorizes Council legal staff to initiate condemnation proceedings for those parcels staff cannot acquire by negotiation.
8. 2013-173 Authorize the Regional Administrator to award and execute a Construction Contract for Metro F&I No. 2, Maintenance Warehouse Building, Empire Digester, and RMF Roof Replacements, Project Numbers 800625 and 805996, Contract 13P065, with B.L. Dalsin for its low responsive bid of \$2,018,726.
9. 2013-176 Consider reimbursing Dakota County up to \$6,303,480 from its share of future Regional Parks Capital Improvement Programs for the following projects: Whitetail Woods Regional Park Construction, \$5,453,480, Site grading, access drive, parking lot, play area, trails, sledding hill, site furnishings, utilities, landscaping, signage, picnic shelter, restroom building, camper cabins, and associated phase 1 improvements; Mississippi River Regional Trail-trailhead construction, \$450,000, Parking lot, bathroom building, utilities, signs, landscaping, trails, site furnishings, and miscellaneous site amenities to serve the regional trail at Swing Bridge Park in Inver Grove Heights; Mississippi River Regional Trail-Spring Lake Park engineering, \$400,000, Design and engineering for regional trail from Schaars Bluff picnic area to the western park boundary; However, the Council does not under any circumstances represent or guarantee that reimbursement will be granted, and expenditure of local funds never entitles a park agency to reimbursement.
10. 2013-177 Authorize a grant of up to \$983,489 from the Environment and Natural Resources Trust Fund Acquisition Account to Scott County to finance up to 75% of the costs to acquire the 148-acre Premier Bank parcel for the Doyle-Kennefick Regional Park. The grant should be financed with: \$590,093 from the 2012 Environment and Natural Resources Trust Fund appropriation, and \$393,396 from Metropolitan Council bonds. Consider reimbursing Scott County up to \$327,830, its 25% match, from the County's share of a future Regional Park Capital Improvement Program. However, the Council does not under any circumstances represent or guarantee that reimbursement will be granted, and expenditure of local funds never entitles a park agency to reimbursement.

11. 2013-178 Authorize a grant of up to \$379,106 from the Parks and Trails Legacy Fund Acquisition Account in the Park Acquisition Opportunity Fund to Dakota County to finance up to 75% of the costs to acquire the 56.3-acre Reis parcel for the Spring Lake Park Reserve. The grant should be financed with: \$227,464 from the FY2013 Parks and Trails Legacy Fund appropriation, and \$151,642 from Metropolitan Council bonds. Consider reimbursing Dakota County up to \$126,369, its share of the acquisition costs, from the County share of a future Regional Park Capital Improvement Program. However, the Council does not under any circumstances represent or guarantee that reimbursement will be granted, and expenditure of local funds never entitles a park agency to reimbursement.
12. 2013-179 Adopt the attached review record and allow the City of Eagan to put the Holden Property comprehensive plan amendment (CPA) into effect. Find that the proposed CPA does not change the City's forecasts.

BUSINESS

Community Development

2013-155 Approve one of the following two scenarios for Park Acquisitions Opportunity Fund grant(s) to Three Rivers Park District for the acquisition of the 106 acre Kingswood Special Recreation Feature. The scenarios depend upon approval by the Legislative-Citizen Commission on Minnesota Resources (LCCMR) on June 11 to use Environment and Natural Resources Fund appropriations to help partially finance the acquisition:

Scenario 1: If the LCCMR approves use of Environment and Natural Resources Trust Fund appropriations to partially finance the acquisition of the 45 acre "Northern lot" as part of Kingswood Special Recreation Feature, then the Metropolitan Council approves two Park Acquisition Opportunity Fund grants as follows: 1. A grant of up to \$382,125 to finance 75% of the acquisition of the 45 acre "Northern lot" illustrated in Attachment 2. The grant is financed with: \$229,275 from the 2012 Environment and Natural Resources Trust Fund appropriation, \$152,850 Metropolitan Council bonds. This grant must be matched with up to \$127,375 of Three Rivers Park District funds to finance 25% of the "Northern lot" acquisition. 2. A grant of up to \$1,505,858 to finance 75% of the acquisition of 61.3 acres comprised of the "Western Lakeshore lot" and "Eastern lots" illustrated in Attachment 2. The grant is financed with: \$905,315 of FY 2013 Parks and Trails Legacy Fund appropriation, \$603,543 of Metropolitan Council bonds. This grant must be matched with up to \$502,952 of Three Rivers Park District funds to finance 25% of the remaining lot's acquisition costs. The Park District fund match amount of up to \$630,327 is eligible for reimbursement consideration as part of Three Rivers Park District's share of future regional park capital improvement programs. The Council does not under any circumstances represent or guarantee that reimbursement will be granted, and expenditure of local funds never entitles a park agency to reimbursement. Scenario 2: If the LCCMR does not approve use of Environment and Natural Resources Trust Fund appropriations to partially finance the acquisition of the 45 acre "Northern lot" as part of Kingswood Special Recreation Feature, then the Metropolitan Council approves a Park Acquisition Opportunity Fund grant of up to \$1,700,000 from the Parks and Trails Legacy Fund account to Three Rivers Park District to finance up to 67% of the costs to acquire the 106 acre Kingswood Special Recreation Feature. The grant shall be financed as follows: \$1,020,000 of FY 2013 Parks and Trails Legacy Fund appropriation, \$680,000 of Metropolitan Council bonds. This grant must be matched with up to \$821,310 of Three Rivers Park District funds to finance at least 33% of the remaining lot's acquisition costs. The Park District fund match amount up to \$821,310 is eligible for reimbursement consideration as part of Three Rivers Park District's share of future regional park capital improvement programs. The Council does not under any circumstances represent or guarantee that reimbursement will be granted, and expenditure of local funds never entitles a park agency to reimbursement.

It was moved by Cunningham, seconded by Munt

Motion carried.

2013-181 Award 10 Tax Base Revitalization Account grants as recommended below; and authorize its Community Development Division Director to execute the grant agreements on behalf of the Council. Projects recommended for May 2013 TBRA funding cycle and their recommended amounts: Contamination Site Investigation: Minneapolis, Thorp Building: \$24,300; Ramsey, Old Municipal Center: \$14,800. Contamination Cleanup: Edina, Pentagon Park North Phase II: \$535,100; Minneapolis, Praxis Marketplace: \$179,300;

Minneapolis, Shapco Printing: \$487,400; Minneapolis, Velo Flats: \$108,200; New Hope, Winnetka Learning Center: \$200,000; Saint Paul, 324 Johnson: \$719,400; Saint Paul, Hamm's: \$124,600; Saint Paul, Old Home Plaza: \$106,900. Total: \$2,500,000

It was moved by Cunningham, seconded by Kramer

Motion carried.

Environment—Reports on Consent List

Transportation

2013-129 Approve the proposed Title VI policies defining a Major Service Change and determining the threshold for Disparate Impact and Disproportionate Burden.

It was moved by Duininck, seconded by Munt.

Motion carried.

2013-160 Approve the Title VI service equity analysis for the METRO Red Line Service.

It was moved by Duininck, seconded by Rummel.

Motion carried.

2013-137 Authorize the Regional Administrator to execute Contract No. 12P227 with Gillig Corporation for the purchase of 184 replacement 40-ft transit buses, contingent on satisfactory results from the Pre-Award Buy America Audit.

It was moved by Duininck, seconded by Reynoso.

Motion carried.

2013-169 Approve changes to Metro Mobility Premium Same Day Taxi (PSD) service on a demonstration basis to: expand the scope of PSD to include all requests for trips between the hours of 5:00AM and 8:00PM that are received on the day of service, and reduce the customer's share of the initial cost of PSD service from \$7.00 to \$5.00. The Council's maximum payment per trip would increase from \$13.00 to \$15.00. (Customers continue to pay the cost of the trip that's over \$20.) These changes would be effective July 15, 2013 through January 15, 2014 as a 6-month pilot demonstration.

It was moved by Duininck, seconded by Rummel.

Motion carried.

2013-182 SW Authorize the Regional Administrator to: award and execute a contract with the lowest responsive and responsible bidder, PCL Construction Services, Inc., for the Central Station Vertical Circulation Project at a cost of \$1,769,620; exempt the anticipated change order, funded by the City of St. Paul, for inclusion of public art in the project from the 5% delegated change order authority.

It was moved by Duinick, seconded by Munt.

Motion carried.

OTHER BUSINESS

INFORMATION

A. Preliminary 2014 Unified Budget.

The meeting was adjourned at 4:54PM.

Certification

I hereby certify that the foregoing narrative and exhibits constitute a true and accurate record of the Metropolitan Council Meeting of June 26, 2013.

Approved this 10 day of July, 2013.

Emily Getty
Recording Secretary

ATTACHMENT G: APPROVED SERVICE AND FARE EQUITY ANALYSES

Title VI Service Equity Analysis

West End and Route 9 Transit Study Recommended Plan

Metro Transit



April 2017

SRF No. 9253

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Introduction

Metro Transit has proposed service changes to routes 9, 25, 604, 649, and 675. These changes will be referred to as the West End and Route 9 Transit Study Recommended Plan. The affected route areas include Route 9, Route 25 south of downtown Minneapolis, Route 604, Route 649, and Route 675 east of the Louisiana Transit Center. These changes would take effect in August 2017 and meet the threshold for a “major service change” as defines in Metro Transit’s Title VI Program Major Service Change Policy.

The Federal Transit Administration (FTA) requires recipients of federal funding, including Metro Transit, to conduct a Title VI Service Equity Analysis for any proposed service change that meets the agency’s major service change threshold. This analysis fulfills this requirement as it relates to the service changes and additions included in the proposed West End and Route 9 Transit Study Recommended Plan.

The West End and Route 9 Transit Study Concept Plan was the subject of a public comment period in September 2016. In that time, over 40 people attended each of the two scheduled public meetings. Metro Transit received 153 comments from 128 individuals. Modifications were made to the Concept Plan in response to this community feedback.

The Recommended Plan was the subject of public comment in March of 2017 and based on those comments the plan was revised to retain limited peak period service on Route 9B along Glenwood and Xenia west of Penn Avenue. This Service Equity Analysis takes into account changes reflected in the revised Recommended Plan.

Title VI Principles and Definitions

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance. Title VI 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.”

In 1994, President Clinton issued Executive Order 12898, which states that each federal agency “shall make achieving environmental justice part of its mission by identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.” Through this Executive Order, Title VI was identified as one of several Federal laws that should be applied “to prevent minority communities and low-income communities from being subject to disproportionately high and adverse environmental effects.”

To provide direction to recipients of federal funding, the FTA issued Circular 4702.1B, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*, in 2012, which

replaced Circular 4702.1A issued in 2007. This document outlines Title VI evaluation procedures for recipients of FTA-administered transit program funds and includes guidance for a variety of equity evaluations.

Minority

The FTA defines a minority person as one who self-identifies as American Indian/Alaska Native, Asian, Black or African American, Hispanic or Latino, and/or Native Hawaiian/Pacific Islander. For the purposes of this evaluation, non-minority persons were defined as those who self-identify as white and not Hispanic or Latino. All other persons, including those identifying as two or more races and/or ethnicities, were defined as minority persons. The distribution of minority populations within one-quarter mile of the existing and proposed route alignments is shown in Figure 1. Note that the service change area excludes portions of the route with non-stop service.

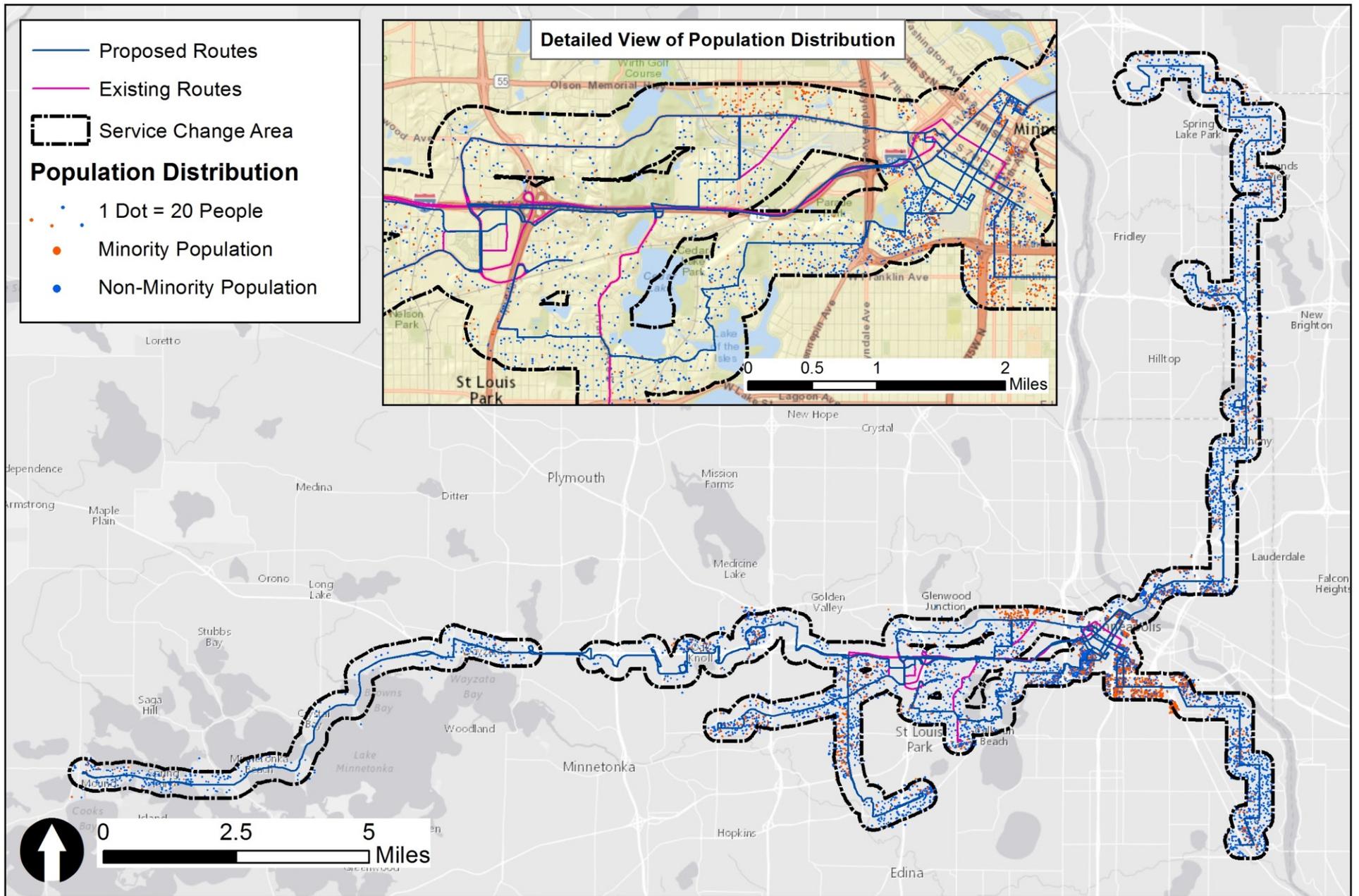
Low-Income

While low-income populations are not an explicitly protected class under Title VI, the FTA recognizes the inherent overlap between Title VI and Environmental Justice principles and requires transit providers to evaluate the impact of service and fare changes to low-income populations and to identify any disproportionate burden placed on those populations by the proposed changes. The FTA defines a low-income person as one whose household income is at or below the poverty guidelines set by the Department of Health and Human Services (DHHS). DHHS poverty thresholds are based on household size and the number of related children less than 18 years of age. The 2014 poverty thresholds used for the data in this evaluation are summarized in Table 1. The distribution of low-income and non-low-income populations within the service change area is shown in Figure 2. Note that the service change area excludes portions of the route with non-stop service.

Table 1. 2014 DHHS Poverty Guidelines

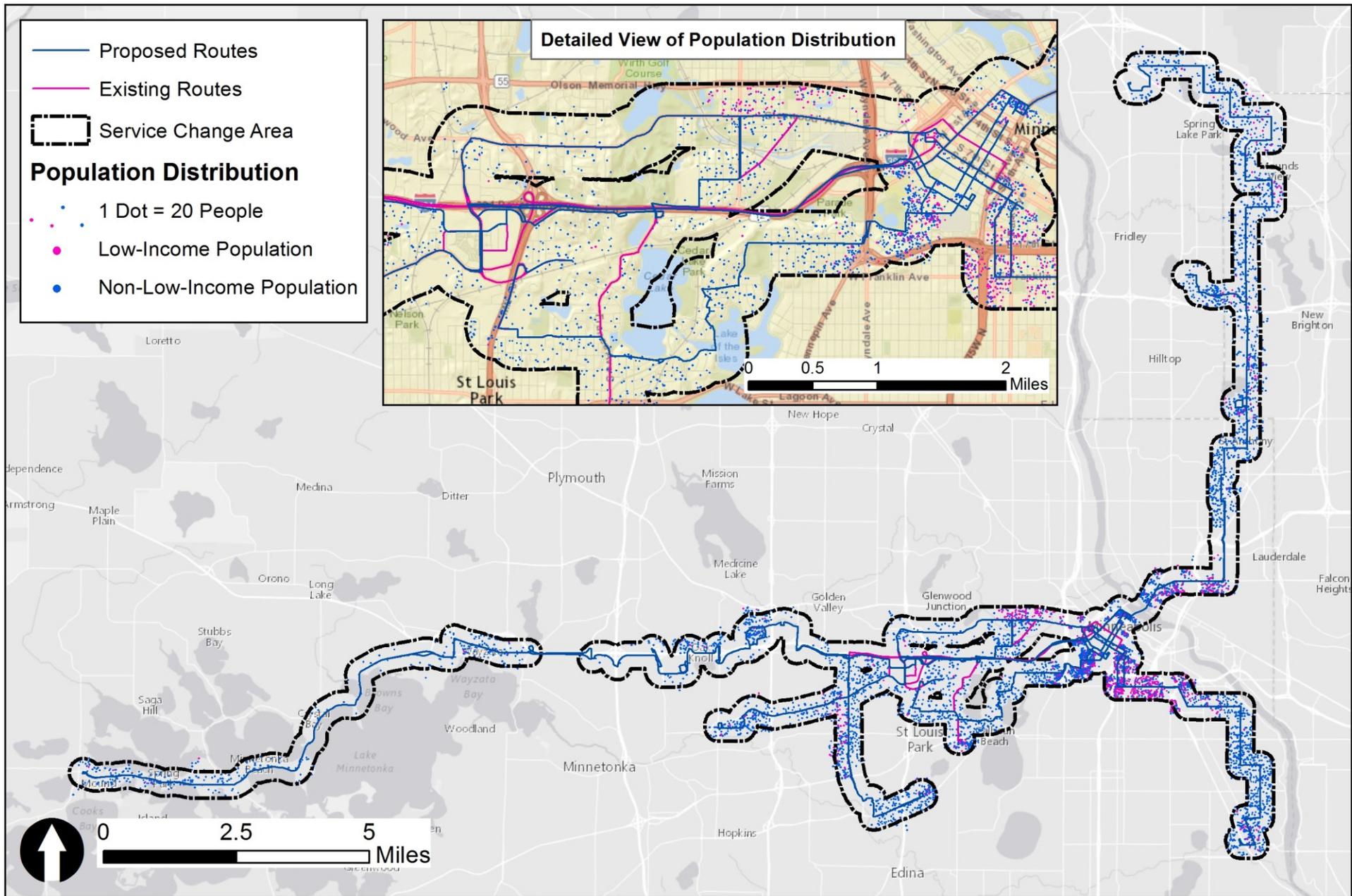
Persons in Family	Threshold for 48 Contiguous States and D.C.
1	\$11,670
2	\$15,730
3	\$19,790
4	\$23,850
5	\$27,910
6	\$31,970
7	\$36,030
8	\$40,090
For each additional person, add	\$4,060

Source: U.S. Department of Health and Human Services (<https://aspe.hhs.gov/2014-poverty-guidelines>)



SRE Consulting Group, Inc. **Distribution of Minority and Non-Minority Populations**
 West End and Route 9 Transit Study Recommended Plan
 Metro Transit

Figure 1



SRE Consulting Group, Inc. **Distribution of Low-Income and Non-Low-Income Populations**
 West End and Route 9 Transit Study Recommended Plan
 Metro Transit

Figure 2

Disparate Impact, Disproportionate Burden, and the Four-Fifths Threshold

The Federal Transit Administration defines “disparate impacts” as facially neutral policies or practices that disproportionately affect members of a group identified by race, color, or national origin, and the recipient’s policy or practice lacks a substantial legitimate justification. If the results of the analysis indicate a potential for disparate impacts, further investigation is required. Metro Transit has defined its disparate impact threshold using the “four-fifths rule.” The four-fifths rule states that there may be evidence of disparate impacts if:

- Benefits are being provided to minority populations at a rate less than 80 percent (four-fifths) of the benefits being provided to non-minority populations, or
- Adverse effects are being borne by non-minority populations at a rate less than 80 percent (four-fifths) of the adverse effects being borne by minority populations.

The four-fifths rule originates from employment law, but is applied in this setting to compare the distribution of benefits and/or adverse impacts among various population groups. The four-fifths rule suggests that a selection rate for any racial, ethnic, or gender group that is less than four-fifths or 80 percent of the rate for the group with the highest selection rate will be regarded as evidence of adverse impact. Although it is a “rule of thumb” and not a legal definition, it is a practical way for identifying adverse impacts that require mitigation or avoidance.

If the quantitative results indicate that the service changes in the West End and Route 9 Transit Study Recommended Plan show evidence of adverse effects to minority populations, this could be evidence of a disparate impact and would require additional analysis. A service change that results in a disparate impact may only be implemented if:

- There is a substantial legitimate justification for the proposed service change, and
- There are no alternatives that would have a less disparate impact while still accomplishing the transit provider’s legitimate program goals.

Metro Transit uses a similar approach when comparing the distribution of benefits and adverse impacts for low-income and non-low-income populations. However, when the distributions for low-income populations fall outside of the four-fifths threshold, this is referred to as a disproportionate burden rather than a disparate impact.

Service Equity Analysis Methodology

A geographic information systems (GIS)-based approach was employed in this analysis to measure the location and magnitude of proposed service changes and compare the distribution of impacts and benefits to minority, non-minority, low-income, and non-low-income populations. The analysis consists of five steps:

1. Model current and proposed service levels.
2. Spatially allocate current and proposed transit service levels to population groups based on intersection between service buffer and census block centroid.
3. Calculate the percent change in service between the current and proposed service levels for each census block.
4. Calculate the average percent change in service for all minority/low-income and non-minority/non-low-income populations within the service area buffer for the current and proposed transit service.
5. Determine whether the proposed service will result in disparate impacts by applying the disparate impact and disproportionate burden policies.

This analysis used the number of trips available to each census block as a measure of overall transit service levels. Common improvements to transit service, such as increased frequency and increased span of service, will result in an increase in the number of trips available. The addition of service to a new area will also result in an increase in the number of trips available to the surrounding areas.

Modeling Current and Proposed Service Levels

Two networks were modeled to represent the current service levels and the proposed service levels. The current service level network represents the conditions as of June 2016 for those routes undergoing a proposed service change. The proposed service level network represents the conditions after the service changes proposed in the West End and Route 9 Recommended Plan are implemented in August 2017. A high-level summary of the proposed changes is included below. Note that the models of current and proposed service include the full extents of each route noted below, not just the portion of those routes experiencing service changes.

- **Route 9:** Eliminate service on Cedar Lake Road between Glenwood Avenue and Penn Avenue and on the H branch south of Wayzata Boulevard. Maintain peak-only B branch service on Glenwood Avenue and Xenia Avenue between downtown Minneapolis and Xenia Avenue and Golden Hills Drive. Reduce peak period frequency.

- **Route 25:** Eliminate reverse commute trips between Lake Street and downtown Minneapolis. Reroute service from Lake Street/France Avenue to serve Cedar Trails Condominiums via 26th Street, Highway 100 East Service Road, and Cedar Lake Road.
- **Route 604:** Eliminate service between the Louisiana Transit Center and Park Place Boulevard/Wayzata Boulevard. Eliminated service will be replaced by new Route 645. Expand weekday span of service to serve 7 a.m. work starts and 5 p.m. work ends at Methodist Hospital.
- **Route 649:** Eliminate route. Service replaced by Route 9, 25, and new Route 645.
- **Route 675 (New Route 645):** Extend all trips to travel a local routing between Louisiana Transit Center and Park Place Boulevard via Wayzata Boulevard, Zarthan Avenue, and 16th Street.

Assigning Transit Trips to Census Blocks

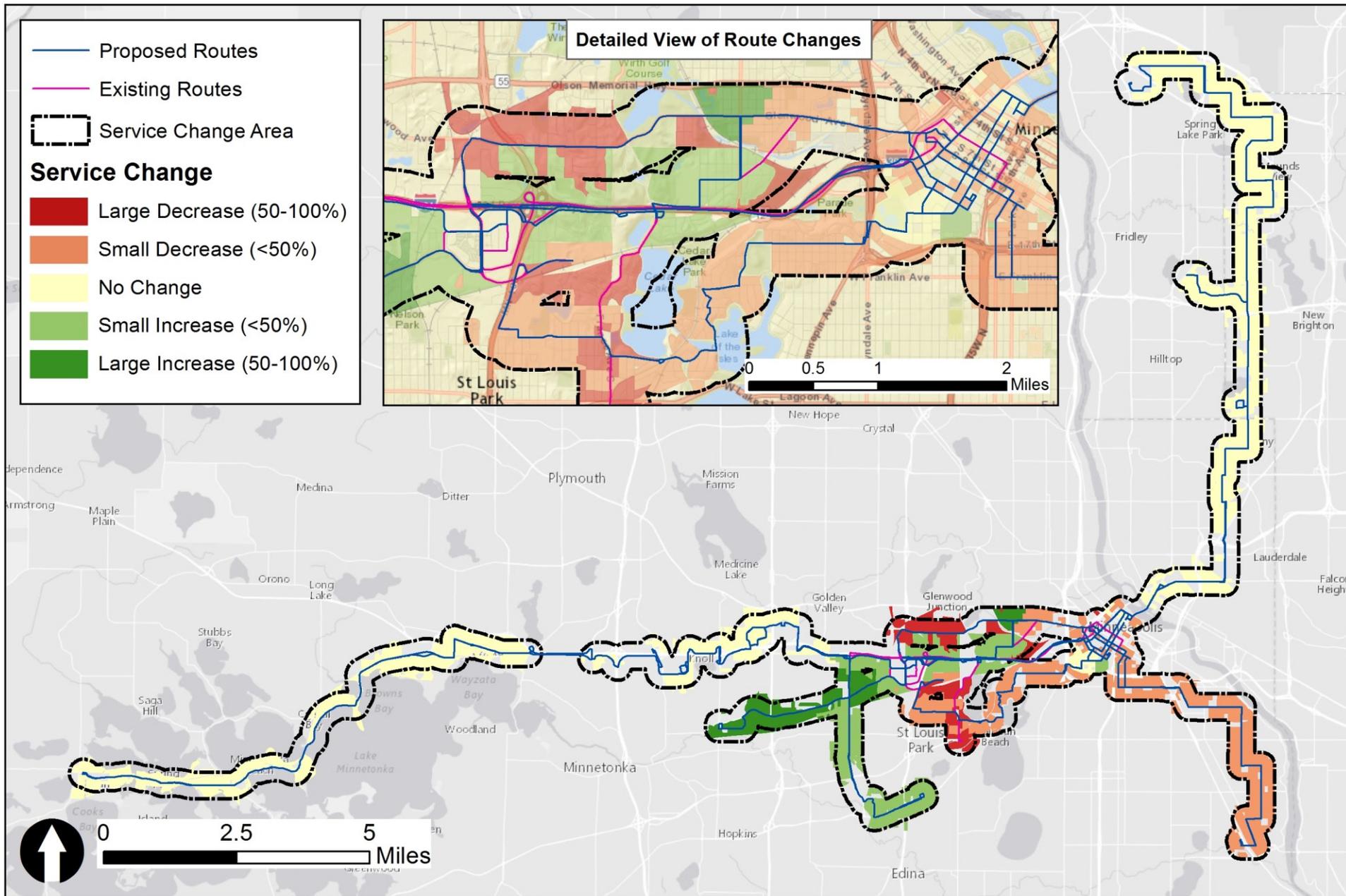
Demographic information is available at the census block level from the 2010 U.S. Decennial Census. However, demographic information is available only at the census block group level from the 2014 American Community Survey (ACS) 5-year Estimates. Census block groups and blocks differ in their geographic makeup. Census blocks are the smallest geographic unit used by the U.S. Census Bureau and are bounded by roadways or water features in urban areas. A census block group is typically made up of a cluster of approximately 40 blocks. Due to their size, it can be difficult to identify location-specific impacts using only block group data.

In order to provide more granularity and detail to the analysis, minority and low-income populations were estimated at the census block level using a combination of 2014 ACS data and 2010 Decennial Census data. The 2014 ACS populations for each block group were allocated to their corresponding blocks using the proportion of total population for that block and block group found in the 2010 Decennial Census. For example, if the 2010 data showed that a block contained 10 percent of the total population within its parent block group, it was assumed that this block contains 10 percent of the minority and low-income populations estimated in the 2014 data. While this approach assumes that the percentage of minority and low-income populations are uniform throughout the block group, it allows for a more precise analysis than using the block groups as a whole. This approach also allows for the identification of zero-population areas within each block group and is consistent with the methodology used in previous Metro Transit Title VI evaluations.

Calculating Change in Service Level by Census Block

The absolute change in service level was calculated for each census block by subtracting the current number of weekly trips available from the proposed number of weekly trips available. After the absolute change was calculated, the percent change in service was calculated by dividing the change in weekly trips by the existing number of weekly trips. To minimize artificial skewing from newly served areas, all percent changes greater than 100 percent, including those that are in calculable due to zero existing service, were adjusted to a maximum value of 100 percent.

The percent change in service level by census block is shown in Figure 3. Areas with zero population are excluded from the figure.



Determining Average Percent Change in Service

The average percent change in service for each target population was calculated by weighting the percent change in each census block by the target population served in that census block. For example, the average percent change in service for minority populations was completed by multiplying each census block's minority population by the percent change in service for that block, summing the results for the blocks in the service change area, and dividing that sum by the total minority population for the blocks in the service change area.

The formula used for these analyses is shown below:

$$Avg \% \Delta = \frac{\sum Population_i \times Percent Change_i}{\sum Population_i}$$

Where:

Population_i = Target population of census block *i*.

Percent Change_i = Percent change in service levels for census block *i*.

In this manner, the weighted percent change was calculated individually for the total population, minority population, non-minority population, low-income population, and non-low-income population. Using this method, the impacts of the service changes for each census block are proportionate to both the demographics of the census blocks and the degree of service level change.

Evaluation of Impacts

In total, 137,325 people live in census blocks within the area that is experiencing a change in service. This population includes 37,640 minority persons, 99,685 non-minority persons, 22,780 low-income persons, and 110,422 non-low-income persons. It should be noted that the ACS cannot determine low-income status for persons residing in group quarters. These include, but are not limited to, populations living in dormitories, group homes, nursing facilities, and correctional facilities. For this reason, the combined total of low-income and non-low-income populations is 133,202, slightly less than that estimated population as a whole. The average percent change in service levels for each target population group is summarized in Table 2.

Table 2. Average Service Level Change by Population Group

Population Group	Population of Service Change Area	Average Percent Service Change	Four-Fifths Threshold (Minimum)
Minority	37,640	-0.03%	-2.7%
Non-Minority	99,685	-3.4%	-
Low-Income	22,780	-1.0%	-2.0%
Non-Low-Income	110,422	-2.5%	-
Total	137,325	-2.5%	-

The proposed service changes result in an overall slight decrease in transit service availability for all population groups. The average individual in the service change area experiences a 2.5 percent decrease in transit service.

The average minority individual in the service change area experiences a 0.03 percent decrease in transit service. This value is higher than the average decrease of 3.4 percent for non-minority individuals. Therefore, this analysis identifies no potential for disparate impact to minority populations as a result of the proposed service changes.

The average low-income individual in the service change area experiences a 1.0 percent decrease in transit service. This value is higher than the average decrease of 2.5 percent for non-low-income individuals. Therefore, this analysis identifies no potential for disproportionate burdens to low-income populations as a result of the proposed service changes.

Summary and Next Steps

Under the guidance of FTA Circular 4702.1B, federal funding recipients such as Metro Transit are required to conduct a Title VI Service Equity Analysis prior to the implementation of any service change that meets the transit agency's major service change threshold. This analysis reviewed the impacts of the proposed service changes outlined in the West End and Route 9 Transit Study Recommended Plan on minority and low-income populations.

This review finds that the recommended service changes will not result in disparate impacts to minority populations or disproportionate burdens to low-income populations. The West End and Route 9 Transit Study was the subject of public comment periods in September 2016 and March 2017, during which Metro Transit received nearly 200 comments from approximately 130 individuals. The implementation date was moved from March to August 2017 in order to more carefully consider community feedback. The West End and Route 9 Transit Study Recommended Plan, including the results of this Service Equity Analysis, will be presented for approval to the Metropolitan Council in April 2017.

Transportation Committee

For the Metropolitan Council meeting of April 26, 2017

Subject: Approval of West End and Route 9 Recommended Plan, including the Title VI Service Equity Analysis

Proposed Action

That the Metropolitan Council approve the West End and Route 9 Recommended Plan, including the Title VI Service Equity Analysis

Summary of Committee Discussion/Questions

Steve Mahowald, Senior Transit Planner, presented the requested action and outlined key elements of the Recommended Plan.

There were no questions.

Motion by Council Member Dorfman, seconded by Council Member Elkins and carried.

Consent to the Council.

Transportation Committee

Meeting date: April 10, 2017

For the Metropolitan Council meeting of April 26, 2017

Subject: Approve West End and Route 9 Recommended Plan, including the Title VI Service Equity Analysis

District(s), Member(s): District 3-Jennifer Munt, District 6-Gail Dorfman, District 7-Gary Cunningham, District 8-Cara Letofsky

Policy/Legal Reference: Public Accountability Policy 2-1, Public Hearing Procedure 2-1b, Transportation Service Changes and Restructuring 1-3a, Public Involvement in the Transportation Planning Process 1-3b

Staff Prepared/Presented: Brian Lamb, General Manager 612-349-7510; Adam Harrington, Director Service Development 612-349-7779; Cyndi Harper, Manager Route Planning 612-349-7723; Steve Mahowald, Senior Planner 612-349-7775

Division/Department: Metro Transit/Service Development

Proposed Action

That the Metropolitan Council approve the West End and Route 9 Recommended Plan, including the Title VI Service Equity Analysis

Background

Metro Transit's West End and Route 9 Recommended Plan targets improvements and efficiencies along Routes 9 (west of downtown Minneapolis), 25, 604, 649, 675 and near the growing high-density job and residential opportunities in the West End area development near Highway 100 and I-394. Goals of the plan include simplifying the structure of Route 9, improving service reliability, improving route performance by eliminating low-ridership segments and providing better connectivity between the West End and Minneapolis.

Study Area

As shown on the attached map, the study area includes parts of Minneapolis, Golden Valley, St. Louis Park and Minnetonka. It is bordered by I-94 to the east, Glenwood Avenue on the north, County Road 73 (Hopkins Crossroad) to the west and Cedar Lake Road/26th Street to the south.

Recommended Plan

The plan includes routing and frequency changes on Routes 9, 25, 604, 649 and 675:

- Route 9 will be simplified, with fewer route variations and the elimination of service on some route segments. Service frequency during the peak period will be reduced and Route 9B service on Glenwood west of Penn Avenue will be reduced to two trips per peak period.
- Route 25 at France and Cedar Lake avenues will be rerouted to serve 26th Street (now served by Route 9H) and Cedar Lake Road east of Highway 100 (now served by Route 649). Six low ridership reverse commute trips will be eliminated.
- Route 604 between Louisiana Transit Center and Park Place Park & Ride will be replaced by Route 645 with a transfer. A morning trip and an afternoon trip will be added to serve Methodist Hospital work shifts.
- Route 649 is proposed for elimination and be replaced by Routes 9, 25 and new Route 645.

- Route 675 will become a new limited-stop Route 645, serving the West End and providing a fast connection to downtown Minneapolis.

Details of proposed changes are included in the attached Executive Summary.

Public Input Process and Modifications to Plan

Several outreach strategies were used to ensure broad public engagement. In addition to creating and broadcasting a project website, holding three public meetings to explain and answer questions regarding the plan, staff boarded buses to ensure that customers were aware of the proposed changes and responded to nearly 200 comments. Staff also reached out to the affected cities and community-based organizations to help spread the word about the proposed service change. In addition to commenting in person, the public was invited to submit comments via telephone, fax, email and the Metropolitan Council website.

Most comments/concerns centered on the proposed elimination of the 9H and 9B branches. Staff revised the plan, after comments received in September on the Concept Plan and again in March after comments were received on the Recommended Plan, to address concerns heard. The 9H concerns were addressed after September's outreach by rerouting Route 25 to serve 26th Street and the 9B concerns were addressed after the March outreach by adding back limited Route 9B service which will be operated on a demonstration basis.

Title VI Service Equity Analysis

The Title VI analysis of the Recommended Plan shows no potential for disparate impacts for minority populations or disproportionate burden for low-income populations. Additional detail regarding the analysis is provided in Chapter 4 of the project report.

Rationale

The budget neutral Recommended Plan improves transit service within the region by reinvesting low-productivity service into transit supportive market areas, eliminating service overlap, making service easier to understand and improving access between downtown Minneapolis and growing concentration of jobs and residents in the West End TOD complex.

Thrive Lens Analysis

The plan addresses the five Thrive outcomes by leveraging transit investment in TOD areas (Stewardship), encouraging redevelopment and infill development (Prosperity), reducing the need to drive (Sustainability), supporting TOD development (Livability), and using investment to build a more equitable region by improving access to low-wage jobs (Equity).

Funding

The Recommended Plan was developed and will be operated within existing Metro Transit and Metropolitan Council transit service resources.

Known Support / Opposition

The West End and Route 9 Recommended Plan has received support from many stakeholders in the project area. Elements of the plan that remain a concern for some riders are: longer travel times for existing Route 675 riders as well as Route 649 riders on Cedar Lake Road; a new downtown routing for those now riding Route 649; and, the number of riders beyond ¼ mile of alternative service.

However, staff believes that this plan does the best job of improving overall transit service in the study area within available transit operations resources while minimizing impacts to existing riders and positioning transit as an attractive transportation choice for existing and new riders.

EXECUTIVE SUMMARY: WEST END AND ROUTE 9 TRANSIT STUDY

The West End and Route 9 Transit Study focuses on the changing travel patterns in parts of north Minneapolis, Golden Valley, St. Louis Park and Minnetonka and proposes modifications to the transit network to address this new demand. While downtown Minneapolis is still a major regional employment area, most of the region's jobs are in dispersed car-oriented suburban employment zones. However, recently more emphasis has been placed on creating suburban areas that integrate residential and employment development together in a pedestrian and transit friendly environment. The West End development near I-394 and Highway 100 in St. Louis Park and Golden Valley is a good example of this type of transit-oriented development.

Study Area

The project examines existing transit service and opportunities for improvements along Route 9 (west of downtown Minneapolis) and near the growing high-density job and residential opportunities in the West End development. Specifically, the study area is bordered in general by I-94 to the east, Glenwood Avenue on the north, County Road 73 (Hopkins Crossroad) to the west and Cedar Lake Road/26th Street to the south. Routes under review for this project include Route 9 west of downtown, Route 25 along France Avenue, Route 604 east of Louisiana Avenue Transit Center, and routes 649 and 675 east of the Louisiana Avenue Transit Center.

Project Goals

Goals of the study include simplifying the route structure, providing better connectivity between the West End and downtown Minneapolis, improving the performance and productivity of service in the study area, and ensuring that under-represented communities that rely on transit share in the benefits of service improvements:

- Route 9 currently has six branches. Simplifying the route structure to eliminate some of these variations will make the route easier for customers to understand.
- Creating efficient schedules that provide more reliable and cost-effective service
- Improving the performance of these routes by reducing or eliminating service on under-utilized or duplicative route segments
- Focusing on opportunities to grow ridership and increase transit market share by recognizing the demographic and development changes that are taking place. This includes providing a faster connection between downtown and the significant mixed use development at the West End as well as ensuring that under-represented communities that rely on transit share in benefits of proposed improvements.

Recommended Plan

The Recommended Plan proposes routing and frequency changes on Routes 9, 25, 604, 649 and 675. Route 9 will be simplified, with fewer route variations and elimination or reduction of service on low ridership segments. Route 25 will be rerouted to cover eliminated segments of routes 9 and 649. Route 604 will no longer operate between Louisiana Avenue Transit Center and Park Place Park & Ride. Route 649 is proposed for elimination and will instead be served by routes 9, 25 and new route 645. Route 675 will become a new limited-stop route (Route 645) serving the West End and providing a fast connection to downtown Minneapolis.

Route 9

Route 9 will be simplified from six branches to three branches. Service is proposed to be eliminated on Cedar Lake Road between Penn and Glenwood and on the 9H branch along Cedar Lake Parkway, Cedar Lake Road, Ewing and France. Sixty one-way trips by 30 riders are affected by these changes; 14 of these riders are more than a quarter-mile from other service. Route 9D service along Wayzata Boulevard, Zarthan and 16th Street will be replaced by new Route 645 service, resulting in a 33 percent increase in service on this segment. Route 9H service along 26th Street and Barry Street will be replaced by Route 25 with 8 trips as compared to the current

11. Route 9B service along Glenwood and Xenia west of Penn will be reduced to 4 trips as compared to the current 13 and will operate as a demonstration service.

All trips will serve the intersection of Glenwood and Penn avenues in the Bryn Mawr neighborhood, providing a more consistent routing and improving the frequency of service to the area of highest ridership. All trips will also serve Laurel and Upton avenues and the West End via Wayzata Boulevard, Utica, 16th Street and Park Place. Also, for the entire route, south of downtown as well as west of downtown, the weekday frequency will be adjusted on the fringe of the AM and PM rush hours from every 20 to 30 minutes, and in the peak hour from 15 to 20 minutes.

Service on Route 9N on Cedar Lake Road west of Louisiana Avenue to the Greenbrier area in Minnetonka will be improved in the off-peak and will be available hourly on weekdays to match the weekend schedule. During peak periods this area will continue to be served by express routes 643 and 663.

Route 25

At France Avenue and Cedar Lake Avenue the route will be revised to serve eliminated segments of routes 9H and 649 via 26th Street and Cedar Lake Road east of Hwy 100. The four-block segment of Route 25 on France Avenue between Cedar Lake Avenue and Lake Street will be eliminated. Alternate service is available at Lake Street and France via Route 17.

Six reverse commute trips, four coming from downtown to southwest Minneapolis in the morning rush hour and two going to downtown in the afternoon rush hour, will be eliminated. The six trips have a combined ridership of fewer than six riders beyond a quarter-mile of an alternate bus stop.

Route 604

The portion of the route between Louisiana Avenue Transit Center and Park Place Boulevard and Wayzata Boulevard is proposed for elimination and will be replaced by new Route 645. Twenty-four one-way trips by 12 riders who currently ride east of Louisiana Avenue Transit Center will instead have to transfer between Route 604 and new Route 645. This route change will eliminate route duplication and allow for better timed connections.

Route 649

To avoid route duplication, Route 649 will be eliminated and replaced by routes 9, 25 and new Route 645. Customers currently boarding on Cedar Lake Road west of Park Place will instead be served by Route 9. The number of trips on this segment will more than double. Route 25 will serve Cedar Lake Road east of Highway 100 in the area of Cedar Trails Condos with four round trips as compared to the current five on Route 649. Travel time for existing Route 649 riders using routes 9 and 25 will increase by 16-20 minutes. Seventy one-way trips by 35 riders are affected by this change; all 35 are more than a quarter-mile from alternate express service.

Customers using the Park Place Park & Ride and those using Route 649 to commute to jobs in the West End will be served by new Route 645 have no increase in travel time and will see a 32 percent increase in trips between downtown and the West End. All Route 649 customers will continue to have a one-seat ride to downtown Minneapolis and buses will travel on Marquette and 2nd avenues through downtown (existing Route 675 alignment)

Route 675/new Route 645

A significant improvement proposed in this concept plan is all-day limited-stop service between downtown Minneapolis and the West End via I-394 all days of the week, providing a 32 percent increase in service to the West End and a trip that is 16 minutes faster than currently provided on Route 9. Existing Route 675 would be

modified to create this connection east of the Louisiana Avenue Transit Center by traveling on Wayzata Boulevard, Zarthan Avenue, 16th Street, Park Place and I-394. The route is no longer an express route, so it will be renumbered to Route 645 and a less-expensive local fare will be charged.

This reroute adds two to four minutes of travel time for existing riders. Most customers board at park-and-ride lots with alternate express service, but there are 72 riders boarding east of Ridgedale Shopping Center during the morning rush hour who do not have an alternative and will be affected by the longer travel time.

Title VI Service Equity Analysis

The recommended changes are classified as a major service change requiring a Title VI Service Equity Analysis to determine if the changes create a disparate impact or disproportionate burden on minority or low-income populations. While the plan is a mix of service increases and service reductions, overall it will result in a 2.8 decrease in transit service, as measured by the change in number of trips, across the study area.

As shown in the table below, minority populations will see a smaller decrease in transit service than non-minority populations and low-income populations will see a smaller decrease than non-low-income populations. Thus, there are no disparate impacts for minority populations or disproportionate burden for low-income populations.

Average Service Level Change by Population Group

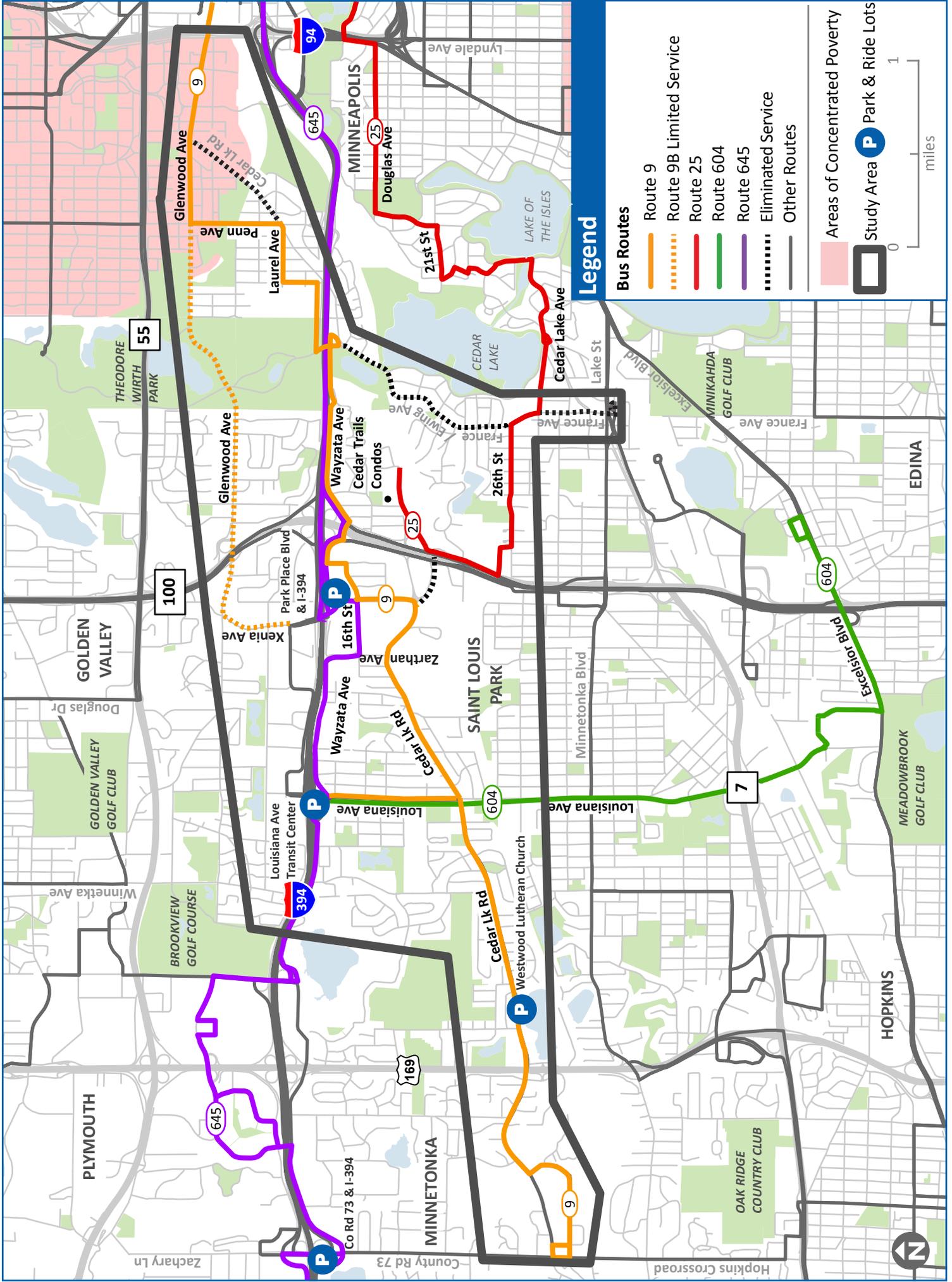
Population Group	Average Percent of Service Change
Minority	-0.7%
Non-Minority	-3.6%
Low-Income	-1.5%
Non-low-income	-2.8%

Public Outreach and Next Steps

Several outreach strategies were used to ensure broad public engagement. In addition to creating and broadcasting a project website, there were three public meetings to explain and answer questions regarding the plan. Metro Transit staff boarded buses to ensure that customers were aware of the proposed changes and responded to nearly 200 comments. Staff also reached out to the affected cities and community-based organizations to help spread the word about the proposed service changes. In addition to commenting in person, the public was invited to submit comments via telephone, fax, email and the Metropolitan Council website.

Most comments/concerns centered on the proposed elimination of the 9H and 9B branches. Staff revised the plan, after comments received in September 2016 on the Concept Plan and again in March 2017 after comments were received on the Recommended Plan, to address concerns heard. The 9H concerns were addressed after September’s outreach by rerouting Route 25 to serve 26th Street and the 9B concerns were addressed after the March outreach by adding back limited Route 9B service which will be operated on a demonstration basis.

The plan will be presented to the Metropolitan Council in April 2017 for final approval. Implementation is planned for August 2017.





West End & Route 9 Transit Study Recommended Plan
Transportation Committee
April 10, 2017
Steve Mahowald, Senior Transit Planner

Project Goals

- Simplifies route structure, easier for customer to understand
 - Reduces Route 9 branches from 6 to 3 on west side
- Improves schedule reliability
- Serves growing jobs & retail in West End
- Improves access for areas of concentrated poverty in Minneapolis and St. Paul
- Improves performance by reducing low-ridership branches & trips

Comments on Plan

- Nearly 200 comments from over 130 individuals
- Most opposed to elimination of 9B and 9H

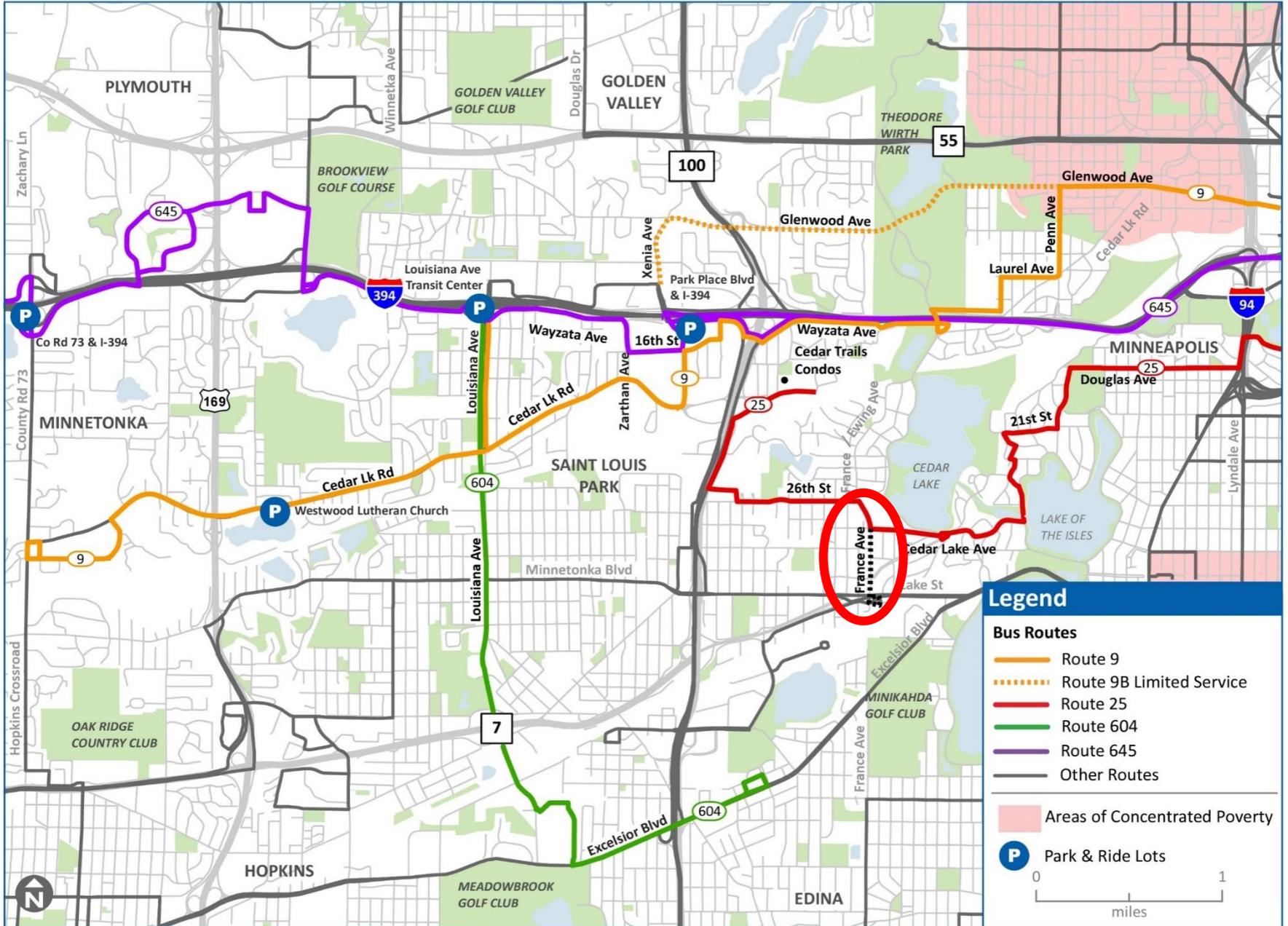
Modifications to Concept Plan

- Route 25 added to project scope
 - Rerouted to cover 26th Street segment of 9H and Cedar Lake Road segment of Route 649 east of Hwy 100 (instead of Rt 9)
 - Six reverse commute trips eliminated
 - 4 block segment on France eliminated
- Route 9 peak frequency reduced along entire route

Modification to Recommended Plan

- Peak period round trips retain on 9B

Recommended Plan



Title VI

- Title VI service equity analysis—no potential for disparate impact

Resources

- Recommended Plan is budget neutral
 - No increase in hours or buses

Ridership

- Anticipated increase of 50,000 annual rides by 2019

Next Steps

- April 26: Full Council for approval
- Implementation August 19, 2017

Requested Action

- Approve West End and Route 9 Recommended Plan, including the Title VI Service Equity Analysis

2017 Fare Change Equity Evaluation

FINAL

Metro Transit

Prepared by:



August 2017

SRF No. 10436

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Introduction

Metro Transit is the primary operator of transit service in the Twin Cities Metropolitan Area. Fixed route service is provided via bus, rapid bus, light rail (METRO), and commuter rail service. Demand response paratransit service is also provided through the Metropolitan Council, the Metropolitan Planning Organization (MPO) for the area. Metro Transit and the Metropolitan Council are considering a change to one or more fare types, triggering the requirement for a Title VI Fare Change Equity Evaluation. This evaluation considers the demographics of users by fare type to determine if the associated fare change will result in positive or negative impacts to specific demographic groups. The evaluation then uses Metro Transit's established Title VI policies to determine whether the changes will result in disparate impacts to minority population or disproportionate burdens to low-income populations.

In July 2017 the Metropolitan Council approved a fare change for transit service operated by all regional transit providers participating in the regional fare structure (Metro Transit and Suburban Transit Providers), with changes to be effective October 1, 2017. The approved fare change increases local fares by \$0.25 and eliminates the Go-To card bonus on stored value purchases with no additional discount. This review finds that the approved fare change does not have potential for disparate impacts to minority populations or disproportionate burdens to low-income populations.

Current Fare Structure

Metro Transit's fares for fixed route service are based on factors including time of day (peak vs. non-peak hours) as well as service type (express bus service is set at a higher rate than local bus, rapid bus, or METRO service). A number of reduced fare options are also available for seniors, youth, persons with disabilities, and other specific rider categories. The fare structure for bus and METRO service is shown in Figure 1.

Figure 1. Metro Transit Fare Structure

Local Bus, A Line & METRO Fares		Non-Rush Hours	Rush Hours Mon.-Fri.: 6-9 am & 3-6:30 pm
Adults (ages 13 to 64)	Local Bus / A Line / METRO	\$1.75	\$2.25
	Express Bus	\$2.25	\$3.00
Reduced Fare Seniors (ages 65+) Photo ID with "T" endorsement required Youth (ages 6 to 12) Ages 5 and under ride free (limit 3) and must ride with a fare-paying customer Medicare card holders Medicare card and Minnesota driver's license/state ID required	Local Bus / A Line / METRO	\$0.75	\$2.25
	Express Bus	\$0.75	\$3.00
Mobility Fare Persons with Disabilities State ID with an "A" or "L" endorsement or a Metro Mobility ID card	Local Bus / A Line / METRO	\$0.75	\$0.75
	Express Bus	\$0.75	\$0.75
Downtown Zone Transfers not available with these fares	Bus / METRO	\$0.50	\$0.50

Source: Metro Transit (www.metrotransit.org/fares)

Proposed Fare Change Scenarios for 2017

Metro Transit has not had a system-wide fare change since 2008, but has considered an increase in fares as a means of addressing projected budget shortfalls. The goals of the 2017 fare changes are to 1) increase fare revenues across all modes of service while minimizing ridership impacts, 2) price fares so that they account for an equitable portion of operating costs and reflect the ability of customers to pay, and 3) simplify the fare structure to make it easier to use and understand. Multiple fare change scenarios were up for consideration and are included in this Title VI review. These include the following:

1. Increase all fares by \$0.25
2. Increase local fares by \$0.25 and express fares by \$0.50
3. Eliminate Go-To card 10 percent bonus¹
4. Flat fare for youth and senior riders
5. Eliminate off-peak express discount
6. Combinations of scenarios 1-5

¹ Go-To card stored value purchases currently give riders a 10% bonus with purchases of \$10 or more.

Title VI and Environmental Justice

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance. Title VI 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.”

In 1994, President Clinton issued Executive Order 12898, which states that each federal agency “shall make achieving environmental justice part of its mission by identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.” Through this Executive Order, Title VI was identified as one of several Federal laws that should be applied “to prevent minority communities and low-income communities from being subject to disproportionately high and adverse environmental effects.”

To provide direction to recipients of federal funding, the Federal Transit Administration (FTA) issued Circular 4702.1B, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*, in 2012, which replaced Circular 4702.1A issued in 2007. This document outlines Title VI evaluation procedures for recipients of FTA-administered transit program funds and includes guidance for a variety of equity evaluations.

Minority

The FTA defines a minority person as one who self-identifies as American Indian/Alaska Native, Asian, Black or African American, Hispanic or Latino, and/or Native Hawaiian/Pacific Islander. For the purposes of this evaluation, non-minority persons were defined as those who self-identify as white and not Hispanic or Latino. All other persons, including those identifying as two or more races and/or ethnicities, were defined as minority persons.

Low-Income

While low-income populations are not an explicitly protected class under Title VI, the FTA recognizes the inherent overlap between Title VI and Environmental Justice principles and requires transit providers to evaluate the impact of service and fare changes on low-income populations and to identify any disproportionate burden placed on those populations by the proposed changes. The FTA defines a low-income person as one whose household income is at or below the poverty guidelines set by the Department of Health and Human Services (DHHS). DHHS poverty guidelines are based on household size and the number of related children less than 18 years of age. The 2016 poverty guidelines used for the data in this evaluation are summarized in Table 1.

Table 1. 2016 DHHS Poverty Guidelines

Persons in Family	Threshold for 48 Contiguous States and D.C.
1	\$11,880
2	\$16,020
3	\$20,160
4	\$24,300
5	\$28,440
6	\$32,580
7	\$36,730
8	\$40,890
For each additional person, add	Varies

Source: U.S. Department of Health and Human Services (<https://aspe.hhs.gov/computations-2016-poverty-guidelines>)

Disparate Impact, Disproportionate Burden, and the Four-Fifths Threshold

The FTA defines “disparate impacts” as facially neutral policies or practices that disproportionately affect members of a group identified by race, color, or national origin, and the recipient’s policy or practice lacks a substantial legitimate justification. If the results of the analysis indicate a potential for disparate impacts, further investigation is required. Metro Transit has defined its disparate impact threshold using the “four-fifths rule.” The four-fifths rule states that there may be evidence of disparate impacts if:

- Benefits are being provided to minority populations at a rate less than 80 percent (four-fifths) of the benefits being provided to non-minority populations, or
- Adverse effects are being borne by non-minority populations at a rate less than 80 percent (four-fifths) of the adverse effects being borne by minority populations².

Metro Transit’s disproportionate burden policy for potential impact to low-income populations uses an identical application of the four-fifths rule to compare the relative impacts to low-income and non-low-income populations.

The four-fifths rule originates from employment law, but is applied in this setting to compare the distribution of benefits and/or adverse impacts among various population groups. The four-fifths rule suggests that a selection rate for any racial, ethnic, or gender group that is less than four-fifths or 80 percent of the rate for the group with the highest selection rate will be regarded as evidence of adverse impact. Although it is a “rule of thumb” and not a legal definition, it is a practical way for identifying adverse impacts that require mitigation or avoidance.

If the quantitative results show that the costs and/or benefits of a proposed fare change do not meet the four-fifths rule, this indicates the potential for adverse effects to minority populations or disproportionate burden to low-income populations. A service or fare change that results in a disparate impact or disproportionate burden may only be implemented if:

- There is a substantial legitimate justification for the proposed service or fare change, and
- There are no alternatives that would have a less disparate impact while still accomplishing the transit provider’s legitimate program goals.

² The inverse of this policy can be alternatively phrased as “adverse effects are being borne by minority populations at a rate more than 125 percent of the adverse effects being borne by non-minority populations.” ($1/1.25 = 80$ percent)

Fare Change Evaluation Methodology

This fare change equity evaluation was completed using a three-step process:

1. Identify user demographics for each unique fare payment type.
2. Calculate average fare for each demographic group under existing conditions and under proposed fare changes.
3. Compare change in average fare and apply Metro Transit Title VI policies to determine potential for disparate impact or disproportionate burden.

User demographics were gathered from the most recent rider survey, completed in 2016. The survey responses were used to identify the minority and low-income status of riders for various fare types. These demographics were then applied to ridership information for each fare in order to calculate the average fare per passenger for minority, non-minority, low-income, and non-low-income riders. The percent change in average fare before and after the implementation of the proposed fare change was used as the basis for applying Metro Transit's Title VI polices and determining potential for disparate impacts or disproportionate burdens.

Existing Rider Survey Review

The 2016 Metro Transit Rider Survey is based on an analysis of 7,725 survey responses for bus (4,429 surveys) and METRO (3,296 surveys) service. The 569 surveys received for Northstar Commuter Rail service were excluded from this analysis. Copies of the bus and METRO surveys are included in Appendix A.

The rider survey includes questions on fare payment type, type of service, time of day that service is typically used, and questions regarding race/ethnicity, household size, and household income. However, some survey responses did not include all the information necessary to be included in the analysis. Survey responses were excluded (or modified) for the following reasons:

- 28 percent (1,241) of bus survey respondents and 28 percent (909) of METRO survey respondents did not respond to the question “When do you usually ride the bus [or light rail]”. This information is critical for identifying peak and non-peak riders. These responses were excluded from the evaluation.
- 20 percent (880) of bus survey respondents did not respond (or correctly respond) to the question, “What is the name and number of the route you are currently riding?” This information is critical for identifying the appropriate fare for bus riders. These responses were excluded from the evaluation.

- 25 percent (1,103) of bus survey respondents and 12 percent (396) of METRO survey respondents did not specify a household size. This information is critical for identifying low-income status. In order to avoid excluding these respondents, those surveys without a response to this question were manually changed to a default of three-person households. This value was selected based on the average household size of 2.5 from the other survey respondents.

Once these exclusions and modifications were made, 5,002 surveys remained for the evaluation. This represents 64.8 percent of the original 7,725 surveys. The remaining surveys were reviewed to assign minority and low-income proportions to each fare payment category. The identification of minority riders was based on self-reported race/ethnicity categories. Responses of “White/Caucasian” were classified as non-minority. All other responses, including those identifying two or more races, were classified as minority. The identification of low-income riders was based on a combination of self-reported household size and household income. The response categories for household income were grouped into ranges in the rider survey, and therefore do not correlate perfectly to the DHHS poverty guidelines. For this evaluation, the maximum values of household income from each range were compared to the poverty guidelines. Table 2 summarizes the identification of low-income riders (identified by “LI” in the table) for up to six-person households.

Table 2. Identification of Low-Income Riders

	Poverty Guideline by Household Size					
	1	2	3	4	5	6
Rider Survey Response: Household Income	\$ 11,880	\$ 16,020	\$ 20,160	\$ 24,300	\$ 28,440	\$ 32,580
Less than \$10,000	LI	LI	LI	LI	LI	LI
\$10,000 - \$14,999	-	LI	LI	LI	LI	LI
\$15,000 - \$24,999	-	-	-	-	LI	LI
\$25,000 - \$34,999	-	-	-	-	-	-
\$35,000 - \$49,999	-	-	-	-	-	-
\$50,000 - \$59,999	-	-	-	-	-	-
\$60,000 - \$74,999						
\$75,000 - \$99,999	-	-	-	-	-	-
\$100,000 - \$149,999	-	-	-	-	-	-
\$150,000 - \$199,999	-	-	-	-	-	-
\$200,000+	-	-	-	-	-	-

Additional survey exclusions were required for survey respondents who did not provide enough information to specify minority and low-income status:

- 4.3 percent (216) of the remaining survey responses did not have enough information to classify minority status.
- 12.4 percent (623) of the remaining survey responses did not have enough information to classify low-income status.

Fare Category Exclusions

In order to simplify this analysis, certain fare categories were excluded. Service on the Northstar Commuter Rail Line operates using a distinct fare structure that varies by boarding station. Many of the potential station-to-station movements do not have sufficient survey data to define the demographic characteristics for each movement with certainty. Daily boardings on the Northstar line also account for only 0.9 percent of system-wide ridership and will have minimal impact on the results of a system-wide fare change review. Due to the complexity of the fare structure, limited data availability, and the low potential for influencing system-wide results, Northstar service was excluded from this evaluation.

Metro Transit currently offers discounted fares for some qualifying riders. These include discounted fares for youth (ages 6-12), seniors (ages 65+), Medicare card holders, and persons with disabilities. The most recent 2016 rider survey did not include a question that indicated whether a rider was using either the Medicare or persons with disability discount and therefore the demographics of those riders cannot be calculated. The previous survey conducted in 2014 included this question, but due to fairly low usage of these discount (less than one percent of total ridership), limited survey data was available for calculating the demographics of each fare payment category. Due to the limited data availability and the low potential for influencing system-wide results, the Medicare and persons with disabilities fare discounts were not included in this analysis.

Total Ridership and Customer Type Identification

Average daily ridership information was provided by Metro Transit's Ridership and Revenue department. Ridership counts were provided for local bus, express bus, and METRO service for both peak and non-peak service. The ridership numbers for each service type were then assigned to a customer type category based on the responses from the 2016 Metro Transit Rider Survey. Customer categories were identified as follows:

- **Youth/Senior:** Surveys with an age response qualifying as either youth (ages 6-12) or senior (ages 65+) were assigned to this category. Youth and senior ridership makes up approximately six percent of all ridership.
- **Adult:** All other survey responses were assigned to this category.

Evaluation of Results

Through the combination of the ridership information and the rider survey results, an estimate of the total daily ridership for minority, non-minority, low-income, and non-low-income riders was made for each mode, customer type, and service type. These estimates were then applied to the current and proposed fare structure to calculate a weighted average fare for each demographic group. The results were used to calculate the percent change in average fare for each group.

In order to meet Metro Transit's fare change equity evaluation policies for a fare increase, the ratio between the fare increase for minority/low-income riders and the fare increase for non-minority/non-low-income riders (otherwise known as the comparison index) must be no more than 1.25. A result in excess of 1.25 would indicate that the fare increase for non-minority/non-low-income riders is less than four fifths ($1/1.25 = 80$ percent) of the increase for minority/low-income riders.

In some instances, the proposed fare change scenarios result in fare decreases. In order to meet Metro Transit's fare change equity evaluation policies for a fare decrease, the ratio between the fare decrease for minority/low-income riders and the fare decrease for non-minority/non-low-income riders (otherwise known as the comparison index) must be no less than 0.80. A result less than 0.80 would indicate that the fare decrease for non-minority/non-low-income riders is less than four fifths ($0.8/1 = 80$ percent) of the decrease for minority/low-income riders.

Scenario 1: Increase all fares by \$0.25

This scenario provides the simplest change to fares by increasing all fare categories by \$0.25. However, this will result in varying degrees of proportional increase. For example, the \$3.00 peak express fare will increase by 8.3 percent, but the off-peak local fare of \$1.75 will increase by 14.3 percent. The results of the analysis are summarized in Table 4.

The average fare for minority riders under the current fare structure is \$2.02 compared to an average fare for non-minority riders of \$2.10. After accounting for the fare changes under Scenario 1, the average fare for minority riders would increase 12.41 percent to \$2.27, while the average fare for non-minority riders would increase 11.92 percent to \$2.35. The comparison index of 1.04 ($12.41/11.92 = 1.04$) indicates that the average fare increase for minority riders is slightly greater than that for non-minority riders, but is within Metro Transit's disparate impact threshold (<1.25 for a fare increase).

The average fare for low-income riders under the current fare structure is \$1.91 compared to an average fare for non-low-income riders of \$2.12. After accounting for the fare changes under Scenario 1, the average fare for low-income riders would increase 13.11 percent to \$2.16, while the average fare for non-low-income riders would increase 11.81 percent to \$2.37. The comparison index of 1.11 ($13.11/11.81 = 1.11$) indicates that the average fare

increase for low-income riders is slightly greater than that for non-low-income riders, but is within Metro Transit's disproportionate burden threshold (<1.25 for a fare increase).

Further analysis shows that these results will hold true for all scenarios involving a flat fare increase of any amount. While the proportional increase in fare for the different rider groups will change, the ratio between those increases between minority and non-minority riders and between low-income and non-low-income riders will remain constant. For example, a flat fare increase of \$0.50 would result in a fare increase of 24.81 percent for minority riders and an increase of 23.84 percent increase for non-minority riders. As with the flat increase of \$0.25, the resulting comparison index is 1.04. Likewise, the flat \$0.50 increase would result in a 26.21 percent increase for low-income riders and a 23.62 percent increase for non-low-income riders, with a comparison index of 1.11.

Scenario 2: Increase local fares by \$0.25 and express fares by \$0.50

This scenario accounts for some of the differences in proportional change by increasing express fares more than local fares. The peak express fare would increase by 16.7 percent under this scenario, more in line with the 14.3 percent increase for off-peak local fares and the 11.1 percent increase for peak local fares. The results of this analysis are summarized in Table 5.

The average fare for minority riders under the current fare structure is \$2.02 compared to an average fare for non-minority riders of \$2.10. After accounting for the fare changes under Scenario 2, the average fare for minority riders would increase 13.22 percent to \$2.28, while the average fare for non-minority riders would increase 14.09 percent to \$2.39. The comparison index of 0.94 indicates that the average fare increase for minority riders is slightly less than that for non-minority riders, within Metro Transit's disparate impact threshold (<1.25 for a fare increase).

The average fare for low-income riders under the current fare structure is \$1.91 compared to an average fare for non-low-income riders of \$2.12. After accounting for the fare changes under Scenario 2, the average fare for low-income riders would increase 13.33 percent to \$2.16 while the average fare for non-low-income riders would increase 13.88 percent to \$2.41. The comparison index of 0.96 indicates that the average fare increase for low-income riders is slightly less than that for non-low-income riders, within Metro Transit's disproportionate burden threshold (<1.25 for a fare increase).

Scenario 3: Eliminate Go-To card 10 percent bonus

Go-To card users currently receive a 10 percent bonus on stored value purchase of \$10 or more. Under this scenario, that bonus would be eliminated. However, Metro Transit is considering the use of a discounted fare for Go-To card users. This review considers three sub-scenario implementations:

- 3a. Elimination of bonus with no additional discount
- 3b. Elimination of bonus with 5 percent additional discount
- 3c. Elimination of bonus with 10 percent additional discount

The results of the analyses are shown in Table 6, Table 7, and Table 8.

Scenario 3a. Elimination of bonus with no additional discount

The average fare for minority riders under the current fare structure, taking into account the 10 percent bonus for Go-To Card users, is \$1.89 compared to an average fare for non-minority riders of \$2.00. After accounting for the fare changes under Scenario 3a, the average fare for minority riders would increase 4.53 percent to \$1.98, while the average fare for non-minority riders would increase 4.88 percent to \$2.09. The comparison index of 0.93 indicates that the average fare increase for minority riders is slightly less than that for non-minority riders, within Metro Transit's disparate impact threshold (<1.25 for a fare increase).

The average fare for low-income riders under the current fare structure, taking into account the 10 percent bonus for Go-To Card users, is \$1.77 compared to an average fare for non-low-income riders of \$2.02. After accounting for the fare changes under Scenario 3a, the average fare for low-income riders would increase 4.53 percent to \$1.85 while the average fare for non-low-income riders would increase 4.81 percent to \$2.11. The comparison index of 0.94 indicates that the average fare increase for low-income riders is slightly less than that for non-low-income riders, within Metro Transit's disproportionate burden threshold (<1.25 for a fare increase).

Scenario 3b. Elimination of bonus with 5 percent additional discount

The average fare for minority riders under the current fare structure, taking into account the 10 percent bonus for Go-To Card users, is \$1.89 compared to an average fare for non-minority riders of \$2.00. After accounting for the fare changes under Scenario 3b, the average fare for minority riders would increase 2.04 percent to \$1.93, while the average fare for non-minority riders would increase 2.20 percent to \$2.04. The comparison index of 0.93 indicates that the average fare increase for minority riders is slightly less than that for non-minority riders, within Metro Transit's disparate impact threshold (<1.25 for a fare increase).

The average fare for low-income riders under the current fare structure, taking into account the 10 percent bonus for Go-To Card users, is \$1.77 compared to an average fare for non-low-income riders of \$2.02. After accounting for the fare changes under Scenario 3b, the average fare for low-income riders would increase 2.04 percent to \$1.81 while the average

fare for non-low-income riders would increase 2.17 percent to \$2.06. The comparison index of 0.94 indicates that the average fare increase for low-income riders is slightly less than that for non-low-income riders, within Metro Transit's disproportionate burden threshold (<1.25 for a fare increase).

Scenario 3c. Elimination of bonus with 10 percent additional discount

The average fare for minority riders under the current fare structure, taking into account the 10 percent bonus for Go-To Card users, is \$1.89 compared to an average fare for non-minority riders of \$2.00. After accounting for the fare changes under Scenario 3c, the average fare for minority riders would decrease 0.45 percent to \$1.88, while the average fare for non-minority riders would decrease 0.49 percent to \$1.99. The comparison index of 0.93 indicates that the average fare decrease for minority riders is slightly less than for non-minority riders, but is within Metro Transit's disparate impact threshold (>0.80 for a fare decrease).

The average fare for low-income riders under the current fare structure, taking into account the 10 percent bonus for Go-To Card users, is \$1.77 compared to an average fare for non-low-income riders of \$2.02. After accounting for the fare changes under Scenario 3c, the average fare for low-income riders would decrease 0.45 percent to \$1.76 while the average fare for non-low-income riders would decrease 0.48 percent to \$2.01. The comparison index of 0.94 indicates that the average fare decrease for low-income riders is slightly less than that for non-low-income riders, but is within Metro Transit's disproportionate burden threshold (>0.80 for a fare decrease).

Scenario 4: Flat fare for youth and senior riders

Metro Transit currently provides discounted fares for youth (ages 6-12) and senior (ages 65+) populations during non-peak service on local bus, express bus, rapid bus, and METRO service. The fare during non-peak hours is \$0.75 for both youth and senior. During peak service, the fares for these populations are \$3.00 for express bus service, and \$2.25 for all other service. Under this scenario, the senior/youth reduced fare would be expanded to cover peak as well as non-peak service. This change would both simplify the fare structure as well as encourage more ridership from these demographic groups. The results of this analysis are shown in Table 9.

The average fare for minority riders under the current fare structure is \$2.02 compared to an average fare for non-minority riders of \$2.10. After accounting for the fare changes under Scenario 4, the average fare for minority riders would decrease 0.45 percent to \$2.01, while the average fare for non-minority riders would decrease 1.25 percent to \$2.07. The comparison index of 0.36 indicates that the average fare decrease for minority riders is less than that for non-minority riders, falling outside of Metro Transit's disparate impact threshold (>0.80 for a fare decrease). **This fare change scenario results in the potential for disparate impact to minority populations.**

The average fare for low-income riders under the current fare structure is \$1.91 compared to an average fare for non-low-income riders of \$2.12. After accounting for the fare changes under Scenario 4, the average fare for low-income riders would decrease 0.57 percent to \$1.90 while the average fare for non-low-income riders would decrease 1.05 percent to \$2.10. The comparison index of 0.55 indicates that the average fare decrease for low-income riders is less than that for non-low-income riders, falling outside of Metro Transit's disproportionate burden threshold (>0.80 for a fare decrease). **This fare change scenario results in the potential for disproportionate burden to low-income populations.**

Scenario 5: Eliminate off-peak express discount

Currently, all the fare categories include a discount for off-peak service. Under this scenario, that discount would be eliminated for express service. All express fares, regardless of time of day, would be \$3.00. The results of this analysis are shown in Table 10.

The average fare for minority riders under the current fare structure is \$2.02 compared to an average fare for non-minority riders of \$2.10. After accounting for the fare changes under Scenario 5, the average fare for minority riders would increase only 0.44 percent, remaining at \$2.02, while the average fare for non-minority riders would increase 0.56 percent to \$2.11. The comparison index of 0.78 indicates that the average fare increase for minority riders is less than that for non-minority riders, within Metro Transit's disparate impact threshold (<1.25 for a fare increase).

The average fare for low-income riders under the current fare structure is \$1.91 compared to an average fare for non-low-income riders of \$2.12. After accounting for the fare changes under Scenario 5, the average fare for low-income riders would increase 0.41 percent to \$1.92 while the average fare for non-low-income riders would increase 0.54 percent to \$2.13. The comparison index of 0.77 indicates that the average fare increase for low-income riders is less than that for non-low-income riders, within Metro Transit's disproportionate burden threshold (<1.25 for a fare increase).

Combinations of Scenarios 1-5

The following scenarios represent combinations of the various scenarios presented above. They are reviewed here to identify the cumulative impacts of combining difference fare change approaches.

Scenario C1. Increase all fares by \$0.25 and eliminate off-peak express discount

This scenario combines the flat \$0.25 fare increase with the elimination of the off-peak express discount to address the differences in average fare change cause by only implementing the flat fare change. The results of this analysis are shown in Table 11.

The average fare for minority riders under the current fare structure is \$2.02 compared to an average fare for non-minority riders of \$2.10. After accounting for the fare changes under

Scenario C1, the average fare for minority riders would increase 12.84 percent to \$2.27, while the average fare for non-minority riders would increase 12.48 percent to \$2.36. The comparison index of 1.03 indicates that the average fare increase for minority riders is slightly greater than that for non-minority riders, but is within Metro Transit's disparate impact threshold (<1.25 for a fare increase).

The average fare for low-income riders under the current fare structure is \$1.91 compared to an average fare for non-low-income riders of \$2.12. After accounting for the fare changes under Scenario C1, the average fare for low-income riders would increase 13.52 percent to \$2.17, while the average fare for non-low-income riders would increase 12.35 percent to \$2.38. The comparison index of 1.09 indicates that the average fare increase for low-income riders is slightly greater than that for non-low-income riders, but is within Metro Transit's disproportionate burden threshold (<1.25 for a fare increase).

Scenario C2. Increase local fares by \$0.25, express fares by \$0.50, and eliminate off-peak express discount

This scenario is identical to the previous combined scenario with the exception that express fares will be subject to a \$0.50 increase rather than the flat \$0.25 increase of other fares. The current peak and off-peak express fares will be replaced by a flat fare of \$3.50 at any time. The results of this analysis are shown in Table 12.

The average fare for minority riders under the current fare structure is \$2.02 compared to an average fare for non-minority riders of \$2.10. After accounting for the fare changes under Scenario C2, the average fare for minority riders would increase 13.65 percent to \$2.29, while the average fare for non-minority riders would increase 14.65 percent to \$2.40. The comparison index of 0.93 indicates that the average fare increase for minority riders is less than that for non-minority riders, below Metro Transit's disparate impact threshold (<1.25 for a fare increase).

The average fare for low-income riders under the current fare structure is \$1.91 compared to an average fare for non-low-income riders of \$2.12. After accounting for the fare changes under Scenario C2, the average fare for low-income riders would increase 13.74 percent to \$2.17, while the average fare for non-low-income riders would increase 14.42 percent to \$2.42. The comparison index of 0.95 indicates that the average fare increase for low-income riders is less than that for non-low-income riders, below Metro Transit's disproportionate burden threshold (<1.25 for a fare increase).

Scenario C3. Increase local fares by \$0.25, express fares by \$0.50, eliminate off-peak express discount, and eliminate Go-To card bonus

This scenario is identical to the first combined scenario, but also includes elimination of the Go-To card bonus on stored value purchases. This bonus will be replaced by a 10 percent discount in this Scenario C3. The results of this analysis are shown in Table 13.

The average fare for minority riders under the current fare structure, taking into account the 10 percent bonus for Go-To Card users, is \$1.89 compared to an average fare for non-minority riders of \$2.00. After accounting for the fare changes under Scenario C3, the average fare for minority riders would increase 13.64 percent to \$2.15, while the average fare for non-minority riders would increase 14.59 percent to \$2.29. The comparison index of 0.93 indicates that the average fare increase for minority riders is less than that for non-minority riders, below Metro Transit's disparate impact threshold (<1.25 for a fare increase).

The average fare for low-income riders under the current fare structure, taking into account the 10 percent bonus for Go-To Card users, is \$1.77 compared to an average fare for non-low-income riders of \$2.02. After accounting for the fare changes under Scenario C3, the average fare for low-income riders would increase 13.70 percent to \$2.02, while the average fare for non-low-income riders would increase 14.39 percent to \$2.31. The comparison index of 0.95 indicates that the average fare increase for low-income riders is less than that for non-low-income riders, below Metro Transit's disproportionate burden threshold (<1.25 for a fare increase).

Scenario C4. Increase local fares by \$0.25 and eliminate Go-To card bonus with no additional discount

Scenario C4 combines Scenarios 1 and 3a: increase local fares by \$0.25 and eliminate the Go-To card bonus on stored value purchases with no additional discount. The results of this analysis are shown in Table 14.

The average fare for minority riders under the current fare structure, taking into account the 10 percent bonus for Go-To Card users, is \$1.89 compared to an average fare for non-minority riders of \$2.00. After accounting for the fare changes under Scenario C4, the average fare for minority riders would increase 11.38 percent to \$2.11, while the average fare for non-minority riders would increase 11.03 percent to \$2.22. The comparison index of 1.03 indicates that the average fare increase for minority riders is slightly greater than that for non-minority riders, but is within Metro Transit's disparate impact threshold (<1.25 for a fare increase).

The average fare for low-income riders under the current fare structure, taking into account the 10 percent bonus for Go-To Card users, is \$1.77 compared to an average fare for non-low-income riders of \$2.02. After accounting for the fare changes under Scenario C4, the average fare for low-income riders would increase 11.74 percent to \$1.98, while the average fare for non-low-income riders would increase 10.99 percent to \$2.24. The comparison index of 1.07 indicates that the average fare increase for low-income riders is slightly greater than that for non-low-income riders, but is within Metro Transit's disproportionate burden threshold (<1.25 for a fare increase).

Scenario Summary

Table 3 summarizes the average change in fare for each population group as well as the comparison index under each fare change scenario proposed above. Scenarios 3c and 4 result in average fare decreases. In these cases the application of the Metro Transit Title VI policies requires that the comparison index be at least 0.80. Scenario 4 does not meet this requirement with comparison index values of 0.36 for minority populations and 0.55 for low-income populations. **This scenario is identified as having potential for disparate impacts to minority populations and disproportionate burdens to low-income populations.**

The remaining scenarios represent average fare increases. For these cases, application of the Title VI policies requires that the comparison index be less than 1.25. Scenarios 1, C1, and C4 result in comparison indices of over 1.00. This result indicates that the adverse impacts of the fare changes are borne by minority and low-income populations more than non-minority and non-low-income populations. However, the results are less than 1.25, Metro Transit's threshold for disparate impacts and disproportionate burden. Therefore, **no potential for disparate impacts to minority populations or disproportionate burdens to low-income populations are identified for these or any of the remaining scenarios shown in Table 3.**

Table 3. Summary of Proposed Fare Change Scenarios for 2017

Scenario		Minority			Low-Income		
		Percent Change		Index	Percent Change		Index
		Minority	Non-Minority		Low-Income	Non-Low-Income	
1	Increase all fares by \$0.25	12.41%	11.92%	1.04	13.11%	11.81%	1.11
2	Increase local fares by \$0.25 and express fares by \$0.50	13.22%	14.09%	0.94	13.33%	13.88%	0.96
3a	Eliminating Go-To Card 10% bonus (no additional discount)	4.53%	4.88%	0.93	4.53%	4.81%	0.94
3b	Eliminating Go-To Card 10% bonus (5% additional discount)	2.04%	2.20%	0.93	2.04%	2.17%	0.94
3c	Eliminating Go-To Card 10% bonus (10% additional discount)	-0.45%	-0.49%	0.93	-0.45%	-0.48%	0.94
4	Flat Fare for youth and senior riders	-0.45%	-1.25%	0.36	-0.57%	-1.05%	0.55
5	Eliminate off-peak express discount	0.44%	0.56%	0.78	0.41%	0.54%	0.77
C1	Increase all fares by \$0.25 and eliminate off-peak express discount	12.84%	12.48%	1.03	13.52%	12.35%	1.09
C2	Increase local fares by \$0.25 and express fares by \$0.50, and eliminate off-peak express discount	13.65%	14.65%	0.93	13.74%	14.42%	0.95
C3	Increase local fares by \$0.25 and express fares by \$0.50, eliminate off-peak express discount, and eliminate Go-To card bonus (10% additional discount)	13.64%	14.59%	0.93	13.70%	14.39%	0.95
C4	Increase local fares by \$0.25 and eliminate Go-To card bonus (no additional discount)	11.38%	11.03%	1.03	11.74%	10.99%	1.07

Table 4. Scenario 1 Results: Increase all fares by \$0.25

Mode	Customer Type	Service Type	Existing Fare	Proposed Fare	Survey Count	Minority Percentage	Low-Income Percentage	Average Daily Boardings (% of Service Type)	Average Daily Boardings	Minority Boardings	Non-Minority Boardings	Low-Income Boardings	Non-Low-Income Boardings
Bus	Adult	Peak Local	\$ 2.25	\$ 2.50	1,324	43.2%	22.7%	97.14%	74,591	32,203	42,388	16,961	57,629
		Off-Peak Local	\$ 1.75	\$ 2.00	615	51.9%	40.9%	88.87%	80,421	41,720	38,701	32,906	47,515
		Peak Express	\$ 3.00	\$ 3.25	720	17.8%	1.3%	98.77%	33,186	5,916	27,271	442	32,744
		Off-Peak Express	\$ 2.25	\$ 2.50	18	33.3%	18.8%	94.74%	3,891	1,297	2,594	730	3,162
	Youth/Senior	Peak Local	\$ 2.25	\$ 2.50	39	21.1%	19.4%	2.86%	2,197	463	1,735	427	1,770
		Off-Peak Local	\$ 0.75	\$ 1.00	77	14.5%	17.2%	11.13%	10,069	1,457	8,612	1,731	8,338
		Peak Express	\$ 3.00	\$ 3.25	9	0.0%	0.0%	1.23%	415	-	415	-	415
		Off-Peak Express	\$ 0.75	\$ 1.00	-	n/a	n/a	0.00%	-	0	-	0	-
METRO	Adult	Peak METRO	\$ 2.25	\$ 2.50	1,439	37.2%	18.9%	97.76%	35,166	13,078	22,087	6,652	28,513
		Off-Peak METRO	\$ 1.75	\$ 2.00	665	41.8%	27.7%	90.97%	32,724	13,687	19,038	9,072	23,653
	Youth/Senior	Peak METRO	\$ 2.25	\$ 2.50	31	27.6%	10.3%	2.11%	758	209	549	78	679
		Off-Peak METRO	\$ 0.75	\$ 1.00	65	9.5%	10.5%	8.89%	3,199	305	2,894	337	2,862
TOTAL									\$ 2.06	\$ 2.02	\$ 2.10	\$ 1.91	\$ 2.12
Usable Surveys					5,002	AVERAGE FARE (Existing)			\$ 2.31	\$ 2.27	\$ 2.35	\$ 2.16	\$ 2.37
All Surveys					7,725	AVERAGE FARE (Proposed)			12.11%	12.41%	11.92%	13.11%	11.81%
						Percent Change							
						Comparison Index					1.04		1.11

Table 5. Scenario 2 Results: Increase local fares by \$0.25 and express fares by \$0.50

Mode	Customer Type	Service Type	Existing Fare	Proposed Fare	Survey Count	Minority Percentage	Low-Income Percentage	Average Daily Boardings (% of Service Type)	Average Daily Boardings	Minority Boardings	Non-Minority Boardings	Low-Income Boardings	Non-Low-Income Boardings
Bus	Adult	Peak Local	\$ 2.25	\$ 2.50	1,324	43.2%	22.7%	97.14%	74,591	32,203	42,388	16,961	57,629
		Off-Peak Local	\$ 1.75	\$ 2.00	615	51.9%	40.9%	88.87%	80,421	41,720	38,701	32,906	47,515
		Peak Express	\$ 3.00	\$ 3.50	720	17.8%	1.3%	98.77%	33,186	5,916	27,271	442	32,744
		Off-Peak Express	\$ 2.25	\$ 2.75	18	33.3%	18.8%	94.74%	3,891	1,297	2,594	730	3,162
	Youth/Senior	Peak Local	\$ 2.25	\$ 2.50	39	21.1%	19.4%	2.86%	2,197	463	1,735	427	1,770
		Off-Peak Local	\$ 0.75	\$ 1.00	77	14.5%	17.2%	11.13%	10,069	1,457	8,612	1,731	8,338
		Peak Express	\$ 3.00	\$ 3.50	9	0.0%	0.0%	1.23%	415	-	415	-	415
		Off-Peak Express	\$ 0.75	\$ 1.25	-	n/a	n/a	0.00%	-	-	-	-	-
METRO	Adult	Peak METRO	\$ 2.25	\$ 2.50	1,439	37.2%	18.9%	97.76%	35,166	13,078	22,087	6,652	28,513
		Off-Peak METRO	\$ 1.75	\$ 2.00	665	41.8%	27.7%	90.97%	32,724	13,687	19,038	9,072	23,653
	Youth/Senior	Peak METRO	\$ 2.25	\$ 2.50	31	27.6%	10.3%	2.11%	758	209	549	78	679
		Off-Peak METRO	\$ 0.75	\$ 1.00	65	9.5%	10.5%	8.89%	3,199	305	2,894	337	2,862
TOTAL									\$ 2.06	\$ 2.02	\$ 2.10	\$ 1.91	\$ 2.12
Usable Surveys					5,002	AVERAGE FARE (Existing)			\$ 2.35	\$ 2.28	\$ 2.39	\$ 2.16	\$ 2.41
All Surveys					7,725	AVERAGE FARE (Proposed)			13.75%	13.22%	14.09%	13.33%	13.88%
						Percent Change							
						Comparison Index					0.94		0.96

Table 6. Scenario 3a Results: Eliminate Go-To card bonus (No additional discount)

	Mode	Customer Type	Service Type	Existing Fare	Proposed Fare	Survey Count	Minority Percentage	Low-Income Percentage	Average Daily Boardings (% of Service Type)	Average Daily Boardings	Minority Boardings	Non-Minority Boardings	Low-Income Boardings	Non-Low-Income Boardings	
Non-Go-To Card Users	Bus	Adult	Peak Local	\$ 2.25	\$ 2.25	789	43.2%	22.7%	97.14%	44,450	19,190	25,260	10,108	34,343	
			Off-Peak Local	\$ 1.75	\$ 1.75	430	51.9%	40.9%	88.87%	56,229	29,170	27,059	23,008	33,222	
			Peak Express	\$ 3.00	\$ 3.00	438	17.8%	1.3%	98.77%	20,188	3,599	16,590	269	19,919	
			Off-Peak Express	\$ 2.25	\$ 2.25	11	33.3%	18.8%	94.74%	1,946	649	1,297	365	1,581	
		Youth/Senior	Peak Local	\$ 2.25	\$ 2.25	18	21.1%	19.4%	2.86%	1,014	213	801	197	817	
			Off-Peak Local	\$ 0.75	\$ 0.75	46	14.5%	17.2%	11.13%	6,015	871	5,145	1,034	4,981	
			Peak Express	\$ 3.00	\$ 3.00	2	0.0%	0.0%	1.23%	92	-	92	-	92	
			Off-Peak Express	\$ 0.75	\$ 0.75	-	n/a	n/a	0.00%						
	METRO	Adult	Peak METRO	\$ 2.25	\$ 2.25	1,028	37.2%	18.9%	97.76%	25,122	9,343	15,779	4,752	20,370	
			Off-Peak METRO	\$ 1.75	\$ 1.75	492	41.8%	27.7%	90.97%	24,211	10,126	14,085	6,712	17,499	
		Youth/Senior	Peak METRO	\$ 2.25	\$ 2.25	19	27.6%	10.3%	2.11%	464	128	336	48	416	
			Off-Peak METRO	\$ 0.75	\$ 0.75	38	9.5%	10.5%	8.89%	1,870	178	1,692	197	1,673	
Go-To Card Users	Bus	Adult	Peak Local	\$ 2.05	\$ 2.25	535	36.8%	17.2%	97.14%	30,140	11,083	19,058	5,194	24,946	
			Off-Peak Local	\$ 1.59	\$ 1.75	185	40.8%	30.3%	88.87%	24,192	41,720	38,701	32,906	47,515	
			Peak Express	\$ 2.73	\$ 3.00	282	17.0%	0.4%	98.77%	12,998	5,916	27,271	442	32,744	
			Off-Peak Express	\$ 2.05	\$ 2.25	7	42.9%	0.0%	94.74%	1,946	1,297	2,594	730	3,162	
		Youth/Senior	Peak Local	\$ 2.05	\$ 2.25	21	10.0%	5.3%	2.86%	1,183	463	1,735	427	1,770	
			Off-Peak Local	\$ 0.68	\$ 0.75	31	3.3%	10.3%	11.13%	4,054	1,457	8,612	1,731	8,338	
			Peak Express	\$ 2.73	\$ 3.00	7	0.0%	0.0%	1.23%	323	-	415	-	415	
			Off-Peak Express	\$ 0.68	\$ 0.75	-	n/a	n/a	0.00%	-	-	-	-	-	
	METRO	Adult	Peak METRO	\$ 2.05	\$ 2.25	411	33.8%	13.3%	97.76%	10,044	3,399	6,645	1,334	8,710	
			Off-Peak METRO	\$ 1.59	\$ 1.75	173	33.7%	20.6%	90.97%	8,513	2,872	5,641	1,756	6,757	
		Youth/Senior	Peak METRO	\$ 2.05	\$ 2.25	12	9.1%	9.1%	2.11%	293	27	267	27	267	
			Off-Peak METRO	\$ 0.68	\$ 0.75	27	7.4%	9.1%	8.89%	1,329	98	1,230	121	1,208	
TOTAL															
						Usable Surveys	5,002	AVERAGE FARE (Existing)		\$ 2.00	\$ 1.89	\$ 2.00	\$ 1.77	\$ 2.02	
						All Surveys	7,725	AVERAGE FARE (Proposed)		\$ 2.06	\$ 1.98	\$ 2.09	\$ 1.85	\$ 2.11	
								Percent Change		3.28%	4.53%	4.88%	4.53%	4.81%	
								Comparison Index				0.93		0.94	

Table 7. Scenario 3b Results: Eliminate Go-To card bonus (5 percent additional discount)

	Mode	Customer Type	Service Type	Existing Fare	Proposed Fare	Survey Count	Minority Percentage	Low-Income Percentage	Average Daily Boardings (% of Service Type)	Average Daily Boardings	Minority Boardings	Non-Minority Boardings	Low-Income Boardings	Non-Low-Income Boardings	
Non-Go-To Card Users	Bus	Adult	Peak Local	\$ 2.25	\$ 2.25	789	43.2%	22.7%	97.14%	44,450	19,190	25,260	10,108	34,343	
			Off-Peak Local	\$ 1.75	\$ 1.75	430	51.9%	40.9%	88.87%	56,229	29,170	27,059	23,008	33,222	
			Peak Express	\$ 3.00	\$ 3.00	438	17.8%	1.3%	98.77%	20,188	3,599	16,590	269	19,919	
			Off-Peak Express	\$ 2.25	\$ 2.25	11	33.3%	18.8%	94.74%	1,946	649	1,297	365	1,581	
		Youth/Senior	Peak Local	\$ 2.25	\$ 2.25	18	21.1%	19.4%	2.86%	1,014	213	801	197	817	
			Off-Peak Local	\$ 0.75	\$ 0.75	46	14.5%	17.2%	11.13%	6,015	871	5,145	1,034	4,981	
			Peak Express	\$ 3.00	\$ 3.00	2	0.0%	0.0%	1.23%	92	-	92	-	92	
			Off-Peak Express	\$ 0.75	\$ 0.75	-	n/a	n/a	0.00%	-	-	-	-	-	
	METRO	Adult	Peak METRO	\$ 2.25	\$ 2.25	1,028	37.2%	18.9%	97.76%	25,122	9,343	15,779	4,752	20,370	
			Off-Peak METRO	\$ 1.75	\$ 1.75	492	41.8%	27.7%	90.97%	24,211	10,126	14,085	6,712	17,499	
		Youth/Senior	Peak METRO	\$ 2.25	\$ 2.25	19	27.6%	10.3%	2.11%	464	128	336	48	416	
			Off-Peak METRO	\$ 0.75	\$ 0.75	38	9.5%	10.5%	8.89%	1,870	178	1,692	197	1,673	
Go-To Card Users	Bus	Adult	Peak Local	\$ 2.05	\$ 2.14	535	36.8%	17.2%	97.14%	30,140	11,083	19,058	5,194	24,946	
			Off-Peak Local	\$ 1.59	\$ 1.66	185	40.8%	30.3%	88.87%	24,192	41,720	38,701	32,906	47,515	
			Peak Express	\$ 2.73	\$ 2.85	282	17.0%	0.4%	98.77%	12,998	5,916	27,271	442	32,744	
			Off-Peak Express	\$ 2.05	\$ 2.14	7	42.9%	0.0%	94.74%	1,946	1,297	2,594	730	3,162	
		Youth/Senior	Peak Local	\$ 2.05	\$ 2.14	21	10.0%	5.3%	2.86%	1,183	463	1,735	427	1,770	
			Off-Peak Local	\$ 0.68	\$ 0.71	31	3.3%	10.3%	11.13%	4,054	1,457	8,612	1,731	8,338	
			Peak Express	\$ 2.73	\$ 2.85	7	0.0%	0.0%	1.23%	323	-	415	-	415	
			Off-Peak Express	\$ 0.68	\$ 0.71	-	n/a	n/a	0.00%	-	-	-	-	-	
	METRO	Adult	Peak METRO	\$ 2.05	\$ 2.14	411	33.8%	13.3%	97.76%	10,044	3,399	6,645	1,334	8,710	
			Off-Peak METRO	\$ 1.59	\$ 1.66	173	33.7%	20.6%	90.97%	8,513	2,872	5,641	1,756	6,757	
		Youth/Senior	Peak METRO	\$ 2.05	\$ 2.14	12	9.1%	9.1%	2.11%	293	27	267	27	267	
			Off-Peak METRO	\$ 0.68	\$ 0.71	27	7.4%	9.1%	8.89%	1,329	98	1,230	121	1,208	
TOTAL															
						Usable Surveys	5,002	AVERAGE FARE (Existing)		\$ 2.00	\$ 1.89	\$ 2.00	\$ 1.77	\$ 2.02	
						All Surveys	7,725	AVERAGE FARE (Proposed)		\$ 2.03	\$ 1.93	\$ 2.04	\$ 1.81	\$ 2.06	
								Percent Change		1.47%	2.04%	2.20%	2.04%	2.17%	
								Comparison Index				0.93		0.94	

Table 8. Scenario 3c Results: Eliminate Go-To card bonus (10 percent additional discount)

	Mode	Customer Type	Service Type	Existing Fare	Proposed Fare	Survey Count	Minority Percentage	Low-Income Percentage	Average Daily Boardings (% of Service Type)	Average Daily Boardings	Minority Boardings	Non-Minority Boardings	Low-Income Boardings	Non-Low-Income Boardings	
Non-Go-To Card Users	Bus	Adult	Peak Local	\$ 2.25	\$ 2.25	789	43.2%	22.7%	97.14%	44,450	19,190	25,260	10,108	34,343	
			Off-Peak Local	\$ 1.75	\$ 1.75	430	51.9%	40.9%	88.87%	56,229	29,170	27,059	23,008	33,222	
			Peak Express	\$ 3.00	\$ 3.00	438	17.8%	1.3%	98.77%	20,188	3,599	16,590	269	19,919	
			Off-Peak Express	\$ 2.25	\$ 2.25	11	33.3%	18.8%	94.74%	1,946	649	1,297	365	1,581	
		Youth/Senior	Peak Local	\$ 2.25	\$ 2.25	18	21.1%	19.4%	2.86%	1,014	213	801	197	817	
			Off-Peak Local	\$ 0.75	\$ 0.75	46	14.5%	17.2%	11.13%	6,015	871	5,145	1,034	4,981	
			Peak Express	\$ 3.00	\$ 3.00	2	0.0%	0.0%	1.23%	92	-	92	-	92	
			Off-Peak Express	\$ 0.75	\$ 0.75	-	n/a	n/a	0.00%	-	-	-	-	-	
	METRO	Adult	Peak METRO	\$ 2.25	\$ 2.25	1,028	37.2%	18.9%	97.76%	25,122	9,343	15,779	4,752	20,370	
			Off-Peak METRO	\$ 1.75	\$ 1.75	492	41.8%	27.7%	90.97%	24,211	10,126	14,085	6,712	17,499	
		Youth/Senior	Peak METRO	\$ 2.25	\$ 2.25	19	27.6%	10.3%	2.11%	464	128	336	48	416	
			Off-Peak METRO	\$ 0.75	\$ 0.75	38	9.5%	10.5%	8.89%	1,870	178	1,692	197	1,673	
Go-To Card Users	Bus	Adult	Peak Local	\$ 2.05	\$ 2.03	535	36.8%	17.2%	97.14%	30,140	11,083	19,058	5,194	24,946	
			Off-Peak Local	\$ 1.59	\$ 1.58	185	40.8%	30.3%	88.87%	24,192	41,720	38,701	32,906	47,515	
			Peak Express	\$ 2.73	\$ 2.70	282	17.0%	0.4%	98.77%	12,998	5,916	27,271	442	32,744	
			Off-Peak Express	\$ 2.05	\$ 2.03	7	42.9%	0.0%	94.74%	1,946	1,297	2,594	730	3,162	
		Youth/Senior	Peak Local	\$ 2.05	\$ 2.03	21	10.0%	5.3%	2.86%	1,183	463	1,735	427	1,770	
			Off-Peak Local	\$ 0.68	\$ 0.68	31	3.3%	10.3%	11.13%	4,054	1,457	8,612	1,731	8,338	
			Peak Express	\$ 2.73	\$ 2.70	7	0.0%	0.0%	1.23%	323	-	415	-	415	
			Off-Peak Express	\$ 0.68	\$ 0.68	-	n/a	n/a	0.00%	-	-	-	-	-	
	METRO	Adult	Peak METRO	\$ 2.05	\$ 2.03	411	33.8%	13.3%	97.76%	10,044	3,399	6,645	1,334	8,710	
			Off-Peak METRO	\$ 1.59	\$ 1.58	173	33.7%	20.6%	90.97%	8,513	2,872	5,641	1,756	6,757	
		Youth/Senior	Peak METRO	\$ 2.05	\$ 2.03	12	9.1%	9.1%	2.11%	293	27	267	27	267	
			Off-Peak METRO	\$ 0.68	\$ 0.68	27	7.4%	9.1%	8.89%	1,329	98	1,230	121	1,208	
TOTAL															
						Usable Surveys	5,002	AVERAGE FARE (Existing)		\$ 2.00	\$ 1.89	\$ 2.00	\$ 1.77	\$ 2.02	
						All Surveys	7,725	AVERAGE FARE (Proposed)		\$ 1.99	\$ 1.88	\$ 1.99	\$ 1.76	\$ 2.01	
								Percent Change		-0.33%	-0.45%	-0.49%	-0.45%	-0.48%	
								Comparison Index				0.93		0.94	

Table 9. Scenario 4 Results: Flat fare for youth and senior riders

Mode	Customer Type	Service Type	Existing Fare	Proposed Fare	Survey Count	Minority Percentage	Low-Income Percentage	Average Daily Boardings (% of Service Type)	Average Daily Boardings	Minority Boardings	Non-Minority Boardings	Low-Income Boardings	Non-Low-Income Boardings
Bus	Adult	Peak Local	\$ 2.25	\$ 2.25	1,324	43.2%	22.7%	97.14%	74,591	32,203	42,388	16,961	57,629
		Off-Peak Local	\$ 1.75	\$ 1.75	615	51.9%	40.9%	88.87%	80,421	41,720	38,701	32,906	47,515
		Peak Express	\$ 3.00	\$ 3.00	720	17.8%	1.3%	98.77%	33,186	5,916	27,271	442	32,744
		Off-Peak Express	\$ 2.25	\$ 2.25	18	33.3%	18.8%	94.74%	3,891	1,297	2,594	730	3,162
	Youth/Senior	Peak Local	\$ 2.25	\$ 0.75	39	21.1%	19.4%	2.86%	2,197	463	1,735	427	1,770
		Off-Peak Local	\$ 0.75	\$ 0.75	77	14.5%	17.2%	11.13%	10,069	1,457	8,612	1,731	8,338
		Peak Express	\$ 3.00	\$ 0.75	9	0.0%	0.0%	1.23%	415	-	415	-	415
		Off-Peak Express	\$ 0.75	\$ 0.75	-	n/a	n/a	0.00%	-	-	-	-	-
METRO	Adult	Peak METRO	\$ 2.25	\$ 2.25	1,439	37.2%	18.9%	97.76%	35,166	13,078	22,087	6,652	28,513
		Off-Peak METRO	\$ 1.75	\$ 1.75	665	41.8%	27.7%	90.97%	32,724	13,687	19,038	9,072	23,653
	Youth/Senior	Peak METRO	\$ 2.25	\$ 0.75	31	27.6%	10.3%	2.11%	758	209	549	78	679
		Off-Peak METRO	\$ 0.75	\$ 0.75	65	9.5%	10.5%	8.89%	3,199	305	2,894	337	2,862
TOTAL									\$ 2.06	\$ 2.02	\$ 2.10	\$ 1.91	\$ 2.12
Usable Surveys					5,002	AVERAGE FARE (Existing)			\$ 2.05	\$ 2.01	\$ 2.07	\$ 1.90	\$ 2.10
All Surveys					7,725	AVERAGE FARE (Proposed)			-0.94%	-0.45%	-1.25%	-0.57%	-1.05%
						Percent Change							
						Comparison Index					0.36		0.55

Table 10. Scenario 5 Results: Eliminate off-peak express discount

Mode	Customer Type	Service Type	Existing Fare	Proposed Fare	Survey Count	Minority Percentage	Low-Income Percentage	Average Daily Boardings (% of Service Type)	Average Daily Boardings	Minority Boardings	Non-Minority Boardings	Low-Income Boardings	Non-Low-Income Boardings
Bus	Adult	Peak Local	\$ 2.25	\$ 2.25	1,324	43.2%	22.7%	97.14%	74,591	32,203	42,388	16,961	57,629
		Off-Peak Local	\$ 1.75	\$ 1.75	615	51.9%	40.9%	88.87%	80,421	41,720	38,701	32,906	47,515
		Peak Express	\$ 3.00	\$ 3.00	720	17.8%	1.3%	98.77%	33,186	5,916	27,271	442	32,744
		Off-Peak Express	\$ 2.25	\$ 3.00	18	33.3%	18.8%	94.74%	3,891	1,297	2,594	730	3,162
	Youth/Senior	Peak Local	\$ 2.25	\$ 2.25	39	21.1%	19.4%	2.86%	2,197	463	1,735	427	1,770
		Off-Peak Local	\$ 0.75	\$ 0.75	77	14.5%	17.2%	11.13%	10,069	1,457	8,612	1,731	8,338
		Peak Express	\$ 3.00	\$ 3.00	9	0.0%	0.0%	1.23%	415	-	415	-	415
		Off-Peak Express	\$ 0.75	\$ 3.00	-	n/a	n/a	0.00%	-	-	-	-	-
METRO	Adult	Peak METRO	\$ 2.25	\$ 2.25	1,439	37.2%	18.9%	97.76%	35,166	13,078	22,087	6,652	28,513
		Off-Peak METRO	\$ 1.75	\$ 1.75	665	41.8%	27.7%	90.97%	32,724	13,687	19,038	9,072	23,653
	Youth/Senior	Peak METRO	\$ 2.25	\$ 2.25	31	27.6%	10.3%	2.11%	758	209	549	78	679
		Off-Peak METRO	\$ 0.75	\$ 0.75	65	9.5%	10.5%	8.89%	3,199	305	2,894	337	2,862
TOTAL									\$ 2.06	\$ 2.02	\$ 2.10	\$ 1.91	\$ 2.12
Usable Surveys					5,002	AVERAGE FARE (Existing)			\$ 2.08	\$ 2.02	\$ 2.11	\$ 1.92	\$ 2.13
All Surveys					7,725	AVERAGE FARE (Proposed)			0.51%	0.44%	0.56%	0.41%	0.54%
						Percent Change							
						Comparison Index					0.78		0.77

Table 11. Scenario C1 Results: Increase all fares by \$0.25 and eliminate off-peak express discount

Mode	Customer Type	Service Type	Existing Fare	Proposed Fare	Survey Count	Minority Percentage	Low-Income Percentage	Average Daily Boardings (% of Service Type)	Average Daily Boardings	Minority Boardings	Non-Minority Boardings	Low-Income Boardings	Non-Low-Income Boardings
Bus	Adult	Peak Local	\$ 2.25	\$ 2.50	1,324	43.2%	22.7%	97.14%	74,591	32,203	42,388	16,961	57,629
		Off-Peak Local	\$ 1.75	\$ 2.00	615	51.9%	40.9%	88.87%	80,421	41,720	38,701	32,906	47,515
		Peak Express	\$ 3.00	\$ 3.25	720	17.8%	1.3%	98.77%	33,186	5,916	27,271	442	32,744
		Off-Peak Express	\$ 2.25	\$ 3.25	18	33.3%	18.8%	94.74%	3,891	1,297	2,594	730	3,162
	Youth/Senior	Peak Local	\$ 2.25	\$ 2.50	39	21.1%	19.4%	2.86%	2,197	463	1,735	427	1,770
		Off-Peak Local	\$ 0.75	\$ 1.00	77	14.5%	17.2%	11.13%	10,069	1,457	8,612	1,731	8,338
		Peak Express	\$ 3.00	\$ 3.25	9	0.0%	0.0%	1.23%	415	-	415	-	415
		Off-Peak Express	\$ 0.75	\$ 3.25	-	n/a	n/a	0.00%	-	0	-	0	-
METRO	Adult	Peak METRO	\$ 2.25	\$ 2.50	1,439	37.2%	18.9%	97.76%	35,166	13,078	22,087	6,652	28,513
		Off-Peak METRO	\$ 1.75	\$ 2.00	665	41.8%	27.7%	90.97%	32,724	13,687	19,038	9,072	23,653
	Youth/Senior	Peak METRO	\$ 2.25	\$ 2.50	31	27.6%	10.3%	2.11%	758	209	549	78	679
		Off-Peak METRO	\$ 0.75	\$ 1.00	65	9.5%	10.5%	8.89%	3,199	305	2,894	337	2,862
TOTAL									\$ 2.06	\$ 2.02	\$ 2.10	\$ 1.91	\$ 2.12
Usable Surveys					5,002	AVERAGE FARE (Existing)			\$ 2.33	\$ 2.27	\$ 2.36	\$ 2.17	\$ 2.38
All Surveys					7,725	AVERAGE FARE (Proposed)			12.62%	12.84%	12.48%	13.52%	12.35%
						Percent Change							
						Comparison Index					1.03		1.09

Table 12. Scenario C2 Results: Increase local fares by \$0.25 and express fares by \$0.50, and eliminate off-peak express discount

Mode	Customer Type	Service Type	Existing Fare	Proposed Fare	Survey Count	Minority Percentage	Low-Income Percentage	Average Daily Boardings (% of Service Type)	Average Daily Boardings	Minority Boardings	Non-Minority Boardings	Low-Income Boardings	Non-Low-Income Boardings
Bus	Adult	Peak Local	\$ 2.25	\$ 2.50	1,324	43.2%	22.7%	97.14%	74,591	32,203	42,388	16,961	57,629
		Off-Peak Local	\$ 1.75	\$ 2.00	615	51.9%	40.9%	88.87%	80,421	41,720	38,701	32,906	47,515
		Peak Express	\$ 3.00	\$ 3.50	720	17.8%	1.3%	98.77%	33,186	5,916	27,271	442	32,744
		Off-Peak Express	\$ 2.25	\$ 3.50	18	33.3%	18.8%	94.74%	3,891	1,297	2,594	730	3,162
	Youth/Senior	Peak Local	\$ 2.25	\$ 2.50	39	21.1%	19.4%	2.86%	2,197	463	1,735	427	1,770
		Off-Peak Local	\$ 0.75	\$ 1.00	77	14.5%	17.2%	11.13%	10,069	1,457	8,612	1,731	8,338
		Peak Express	\$ 3.00	\$ 3.50	9	0.0%	0.0%	1.23%	415	-	415	-	415
		Off-Peak Express	\$ 0.75	\$ 3.50	-	n/a	n/a	0.00%	-	0	-	0	-
METRO	Adult	Peak METRO	\$ 2.25	\$ 2.50	1,439	37.2%	18.9%	97.76%	35,166	13,078	22,087	6,652	28,513
		Off-Peak METRO	\$ 1.75	\$ 2.00	665	41.8%	27.7%	90.97%	32,724	13,687	19,038	9,072	23,653
	Youth/Senior	Peak METRO	\$ 2.25	\$ 2.50	31	27.6%	10.3%	2.11%	758	209	549	78	679
		Off-Peak METRO	\$ 0.75	\$ 1.00	65	9.5%	10.5%	8.89%	3,199	305	2,894	337	2,862
TOTAL									\$ 2.06	\$ 2.02	\$ 2.10	\$ 1.91	\$ 2.12
Usable Surveys					5,002	AVERAGE FARE (Existing)			\$ 2.36	\$ 2.29	\$ 2.40	\$ 2.17	\$ 2.42
All Surveys					7,725	AVERAGE FARE (Proposed)			14.26%	13.65%	14.65%	13.74%	14.42%
						Percent Change							
						Comparison Index					0.93		0.95

Table 13. Scenario C3 Results: Increase local fares by \$0.25 and express fares by \$0.50, eliminate off-peak express discount, eliminate Go-To card bonus (10% additional discount)

	Mode	Customer Type	Service Type	Existing Fare	Proposed Fare	Survey Count	Minority Percentage	Low-Income Percentage	Average Daily Boardings (% of Service Type)	Average Daily Boardings	Minority Boardings	Non-Minority Boardings	Low-Income Boardings	Non-Low-Income Boardings	
Non-Go-To Card Users	Bus	Adult	Peak Local	\$ 2.25	\$ 2.50	789	43.2%	22.7%	1	44,450	19,190	25,260	10,108	34,343	
			Off-Peak Local	\$ 1.75	\$ 2.00	430	51.9%	40.9%	1	56,229	29,170	27,059	23,008	33,222	
			Peak Express	\$ 3.00	\$ 3.50	438	17.8%	1.3%	1	20,188	3,599	16,590	269	19,919	
			Off-Peak Express	\$ 2.25	\$ 3.50	11	33.3%	18.8%	1	1,946	649	1,297	365	1,581	
		Youth/Senior	Peak Local	\$ 2.25	\$ 2.50	18	21.1%	19.4%	0	1,014	213	801	197	817	
			Off-Peak Local	\$ 0.75	\$ 1.00	46	14.5%	17.2%	0	6,015	871	5,145	1,034	4,981	
			Peak Express	\$ 3.00	\$ 3.50	2	0.0%	0.0%	0	92	-	92	-	92	
			Off-Peak Express	\$ 0.75	\$ 3.50	-	n/a	n/a	-	-	-	-	-	-	-
	METRO	Adult	Peak METRO	\$ 2.25	\$ 2.50	1,028	37.2%	18.9%	1	25,122	9,343	15,779	4,752	20,370	
			Off-Peak METRO	\$ 1.75	\$ 2.00	492	41.8%	27.7%	1	24,211	10,126	14,085	6,712	17,499	
		Youth/Senior	Peak METRO	\$ 2.25	\$ 2.50	19	27.6%	10.3%	0	464	128	336	48	416	
			Off-Peak METRO	\$ 0.75	\$ 1.00	38	9.5%	10.5%	0	1,870	178	1,692	197	1,673	
Go-To Card Users	Bus	Adult	Peak Local	\$ 2.05	\$ 2.25	535	36.8%	17.2%	1	30,140	11,083	19,058	5,194	24,946	
			Off-Peak Local	\$ 1.59	\$ 1.80	185	40.8%	30.3%	1	24,192	41,720	38,701	32,906	47,515	
			Peak Express	\$ 2.73	\$ 3.15	282	17.0%	0.4%	1	12,998	5,916	27,271	442	32,744	
			Off-Peak Express	\$ 2.05	\$ 3.15	7	42.9%	0.0%	1	1,946	1,297	2,594	730	3,162	
		Youth/Senior	Peak Local	\$ 2.05	\$ 2.25	21	10.0%	5.3%	0	1,183	463	1,735	427	1,770	
			Off-Peak Local	\$ 0.68	\$ 0.90	31	3.3%	10.3%	0	4,054	1,457	8,612	1,731	8,338	
			Peak Express	\$ 2.73	\$ 3.15	7	0.0%	0.0%	0	323	-	415	-	415	
			Off-Peak Express	\$ 0.68	\$ 3.15	-	n/a	n/a	-	-	-	-	-	-	-
	METRO	Adult	Peak METRO	\$ 2.05	\$ 2.25	411	33.8%	13.3%	1	10,044	3,399	6,645	1,334	8,710	
			Off-Peak METRO	\$ 1.59	\$ 1.80	173	33.7%	20.6%	1	8,513	2,872	5,641	1,756	6,757	
		Youth/Senior	Peak METRO	\$ 2.05	\$ 2.25	12	9.1%	9.1%	0	293	27	267	27	267	
			Off-Peak METRO	\$ 0.68	\$ 0.90	27	7.4%	9.1%	0	1,329	98	1,230	121	1,208	
TOTAL															
						Usable Surveys	5,002	AVERAGE FARE (Existing)		\$ 2.00	\$ 1.89	\$ 2.00	\$ 1.77	\$ 2.02	
						All Surveys	7,725	AVERAGE FARE (Proposed)		\$ 2.28	\$ 2.15	\$ 2.29	\$ 2.02	\$ 2.31	
								Percent Change		13.88%	13.64%	14.59%	13.70%	14.39%	
								Comparison Index				0.93		0.95	

Table 14. Scenario C4 Results: Increase local fares by \$0.25 and eliminate Go-To card bonus (no additional discount)

	Mode	Customer Type	Service Type	Existing Fare	Proposed Fare	Survey Count	Minority Percentage	Low-Income Percentage	Average Daily Boardings (% of Service Type)	Average Daily Boardings	Minority Boardings	Non-Minority Boardings	Low-Income Boardings	Non-Low-Income Boardings
Non-Go-To Card Users	Bus	Adult	Peak Local	\$ 2.25	\$ 2.50	789	43.2%	22.7%	97.1%	44,450	19,190	25,260	10,108	34,343
			Off-Peak Local	\$ 1.75	\$ 2.00	430	51.9%	40.9%	88.9%	56,229	29,170	27,059	23,008	33,222
			Peak Express	\$ 3.00	\$ 3.25	438	17.8%	1.3%	98.8%	20,188	3,599	16,590	269	19,919
			Off-Peak Express	\$ 2.25	\$ 2.50	11	33.3%	18.8%	94.7%	1,946	649	1,297	365	1,581
		Youth/Senior	Peak Local	\$ 2.25	\$ 2.50	18	21.1%	19.4%	2.9%	1,014	213	801	197	817
			Off-Peak Local	\$ 0.75	\$ 1.00	46	14.5%	17.2%	11.1%	6,015	871	5,145	1,034	4,981
			Peak Express	\$ 3.00	\$ 3.25	2	0.0%	0.0%	1.2%	92	-	92	-	92
			Off-Peak Express	\$ 0.75	\$ 2.50	-	n/a	n/a	0.0%	-	-	-	-	-
	METRO	Adult	Peak METRO	\$ 2.25	\$ 2.50	1,028	37.2%	18.9%	97.8%	25,122	9,343	15,779	4,752	20,370
			Off-Peak METRO	\$ 1.75	\$ 2.00	492	41.8%	27.7%	91.0%	24,211	10,126	14,085	6,712	17,499
		Youth/Senior	Peak METRO	\$ 2.25	\$ 2.50	19	27.6%	10.3%	2.1%	464	128	336	48	416
			Off-Peak METRO	\$ 0.75	\$ 1.00	38	9.5%	10.5%	8.9%	1,870	178	1,692	197	1,673
Go-To Card Users	Bus	Adult	Peak Local	\$ 2.05	\$ 2.25	535	36.8%	17.2%	97.1%	30,140	11,083	19,058	5,194	24,946
			Off-Peak Local	\$ 1.59	\$ 1.75	185	40.8%	30.3%	88.9%	24,192	41,720	38,701	32,906	47,515
			Peak Express	\$ 2.73	\$ 3.00	282	17.0%	0.4%	98.8%	12,998	5,916	27,271	442	32,744
			Off-Peak Express	\$ 2.05	\$ 2.25	7	42.9%	0.0%	94.7%	1,946	1,297	2,594	730	3,162
		Youth/Senior	Peak Local	\$ 2.05	\$ 2.25	21	10.0%	5.3%	2.9%	1,183	463	1,735	427	1,770
			Off-Peak Local	\$ 0.68	\$ 0.75	31	3.3%	10.3%	11.1%	4,054	1,457	8,612	1,731	8,338
			Peak Express	\$ 2.73	\$ 3.00	7	0.0%	0.0%	1.2%	323	-	415	-	415
			Off-Peak Express	\$ 0.68	\$ 0.75	-	n/a	n/a	0.0%	-	-	-	-	-
	METRO	Adult	Peak METRO	\$ 2.05	\$ 2.25	411	33.8%	13.3%	97.8%	10,044	3,399	6,645	1,334	8,710
			Off-Peak METRO	\$ 1.59	\$ 1.75	173	33.7%	20.6%	91.0%	8,513	2,872	5,641	1,756	6,757
		Youth/Senior	Peak METRO	\$ 2.05	\$ 2.25	12	9.1%	9.1%	2.1%	293	27	267	27	267
			Off-Peak METRO	\$ 0.68	\$ 0.75	27	7.4%	9.1%	8.9%	1,329	98	1,230	121	1,208
TOTAL														
					Usable Surveys	5,002	AVERAGE FARE (Existing)			\$ 2.00	\$ 1.89	\$ 2.00	\$ 1.77	\$ 2.02
					All Surveys	7,725	AVERAGE FARE (Proposed)			\$ 2.23	\$ 2.11	\$ 2.22	\$ 1.98	\$ 2.24
							Percent Change			11.49%	11.38%	11.03%	11.74%	10.99%
							Comparison Index					1.03		1.07

Review of Impacts to Suburban Transit Providers

The Metropolitan Council currently distributes federal funding to multiple suburban transit operators within the Twin Cities metropolitan area. As a distributor of federal funding to subrecipients, the FTA requires that the Council review and monitor the Title VI analysis activities conducted by these providers to ensure compliance with the Title VI Circular. This section of the analysis reviews the potential impacts of some of the proposed fare change scenarios on the suburban provider ridership. For the purposes of this evaluation, Metro Transit's disparate impacts and disproportionate burden thresholds were used to gauge the potential impacts.

The Metropolitan Council's 2010 Travel Behavior Inventory (TBI) Transit On-Board Survey was used to gather ridership and demographic data on Suburban Transit Providers – Maple Grove Transit, Minnesota Valley Transit Authority, Plymouth Metrolink, and SouthWest Transit. Access to 2016 demographic and ridership data from Suburban Transit Providers was not immediately available.

Analysis of impacts to riders of Suburban Transit Providers was completed based on 3,504 surveys collected from riders aboard routes operated by Maple Grove Transit, Minnesota Valley Transit Authority, Plymouth Metrolink, and SouthWest Transit. The survey responses were used to identify the minority and low-income status of riders for various adult fare types. The 2010 TBI survey questions differ from those in the 2016 Metro Transit Rider Survey, resulting in an imperfect comparison. Notably, survey responses to the 2010 TBI do not provide enough information to isolate youth/senior riders. Therefore, analysis was completed using only the adult customer type.

These ridership and demographic data were then applied to the same fare change evaluation methodology used for Metro Transit routes. Results for three scenarios using the Suburban Transit Provider data are summarized below.

Scenario 1 (Suburban Transit Providers only): Increase all adult fares by \$0.25

This scenario provides the simplest change to fares by increasing all fare categories by \$0.25. However, this will result in varying degrees of proportional increase. For example, the \$3.00 peak express fare will increase by 8.3 percent, but the off-peak local fare of \$1.75 will increase by 14.3 percent. The results of the analysis are summarized in Table 15.

The average fare for minority riders of routes operated by Suburban Transit Providers under the current fare structure is \$2.60 compared to an average fare for non-minority riders of \$2.82. After accounting for the fare changes under Scenario 1, the average fare for minority riders would increase 9.62 percent to \$2.85 while the average fare for non-minority riders would increase 8.88 percent to \$3.07. The comparison index of 1.08 indicates that the average fare increase for minority riders is slightly greater than that for non-minority riders, but is within Metro Transit's disparate impact threshold (<1.25 for a fare increase).

The average fare for low-income riders under the current fare structure is \$2.73 compared to an average fare for non-low-income riders of \$2.79. After accounting for the fare changes under Scenario 1, the average fare for low-income riders would increase 9.16 percent to \$2.98 while the average fare for non-low-income riders would increase 8.97 percent to \$3.04. The comparison index of 1.02 indicates that the average fare increase for low-income riders is slightly greater than that for non-low-income riders, but is within Metro Transit's disproportionate burden threshold (<1.25 for a fare increase).

Scenario 2 (Suburban Transit Providers only): Increase adult local fares by \$0.25 and adult express fares by \$0.50

This scenario accounts for some of the differences in proportional change by increasing express fares more than local fares. The peak express fare would increase by 16.7 percent under this scenario, more in line with the 14.3 percent increase for off-peak local fares and the 11.1 percent increase for peak local fares. The results of this analysis are summarized in Table 16.

The average fare for minority riders of routes operated by Suburban Transit Providers under the current fare structure is \$2.60 compared to an average fare for non-minority riders of \$2.82. After accounting for the fare changes under Scenario 2, the average fare for minority riders would increase 16.45 percent to \$3.03, while the average fare for non-minority riders would increase 17.04 percent to \$3.30. The comparison index of 0.97 indicates that the average fare increase for minority riders is slightly less than that for non-minority riders, within Metro Transit's disparate impact threshold (<1.25 for a fare increase).

The average fare for low-income riders under the current fare structure is \$2.73 compared to an average fare for non-low-income riders of \$2.79. After accounting for the fare changes under Scenario 2, the average fare for low-income riders would increase 16.53 percent to \$3.18, while the average fare for non-low-income riders would increase 16.99 percent to \$3.26. The comparison index of 0.97 indicates that the average fare increase for low-income riders is slightly less than that for non-low-income riders, within Metro Transit's disproportionate burden threshold (<1.25 for a fare increase).

Review of Combined Impacts to Metro Transit and Suburban Transit Providers

Despite unavailability of complete and current data for the Suburban Transit Providers, an effort was made to approximate the impact of fare change throughout the regional transit system by incorporating ridership and demographic data specific to the Suburban Transit Providers with those for Metro Transit. Ridership profiles were created for Metro Transit and the Suburban Transit Providers separately, then added together for combined average daily boardings with distinctions between minority and non-minority and low-income and non-low-income.

Scenario 1 (Metro Transit & Suburban Transit Providers): Increase all adult fares by \$0.25

The results of the analysis are summarized in Table 17. The average fare for minority riders under the current fare structure is \$2.03 compared to an average fare for non-minority riders of \$2.17. After accounting for the fare changes under Scenario 1, the average fare for minority riders would increase 12.30 percent to \$2.28, while the average fare for non-minority riders would increase 11.50 percent to \$2.42. The comparison index of 1.07 indicates that the average fare increase for minority riders is slightly greater than that for non-minority riders, but is within Metro Transit's disparate impact threshold (<1.25 for a fare increase).

The average fare for low-income riders under the current fare structure is \$1.93 compared to an average fare for non-low-income riders of \$2.18. After accounting for the fare changes under Scenario 1, the average fare for low-income riders would increase 12.97 percent to \$2.18, while the average fare for non-low-income riders would increase 11.47 percent to \$2.43. The comparison index of 1.13 indicates that the average fare increase for low-income riders is slightly greater than that for non-low-income riders, but is within Metro Transit's disproportionate burden threshold (<1.25 for a fare increase).

Table 15. Scenario 1 Results (Suburban Transit Providers only): Increase all fares by \$0.25

Mode	Customer Type	Service Type	Existing Fare	Proposed Fare	Survey Count	Minority Percentage	Low-Income Percentage	Average Daily Boardings (% of Service Type)	Average Daily Boardings	Minority Boardings	Non-Minority Boardings	Low-Income Boardings	Non-Low-Income Boardings
Bus	Adult	Peak Local	\$ 2.25	\$ 2.50	116	28.0%	14.3%	5.2%	1,189	333	856	170	1,019
		Off-Peak Local	\$ 1.75	\$ 2.00	72	47.3%	11.8%	6.0%	1,366	647	720	161	1,205
		Peak Express	\$ 3.00	\$ 3.25	2,656	11.6%	7.0%	75.2%	17,246	2,008	15,238	1,199	16,047
		Off-Peak Express	\$ 2.25	\$ 2.50	660	12.7%	5.5%	13.7%	3,133	399	2,735	173	2,960
TOTAL									\$ 2.78	\$ 2.60	\$ 2.82	\$ 2.73	\$ 2.79
Usable Surveys					3,504			AVERAGE FARE (Existing)	\$ 3.03	\$ 2.85	\$ 3.07	\$ 2.98	\$ 3.04
								AVERAGE FARE (Proposed)	8.98%	9.62%	8.88%	9.16%	8.97%
								Percent Change					
								Comparison Index			1.08		1.02

Table 16. Scenario 2 Results (Suburban Transit Providers only): Increase local fares by \$0.25 and express fares by \$0.50

Mode	Customer Type	Service Type	Existing Fare	Proposed Fare	Survey Count	Minority Percentage	Low-Income Percentage	Average Daily Boardings (% of Service Type)	Average Daily Boardings	Minority Boardings	Non-Minority Boardings	Low-Income Boardings	Non-Low-Income Boardings
Bus	Adult	Peak Local	\$ 2.25	\$ 2.50	116	28.0%	14.3%	5.2%	1,189	333	856	170	1,019
		Off-Peak Local	\$ 1.75	\$ 2.00	72	47.3%	11.8%	6.0%	1,366	647	720	161	1,205
		Peak Express	\$ 3.00	\$ 3.50	2,656	11.6%	7.0%	75.2%	17,246	2,008	15,238	1,199	16,047
		Off-Peak Express	\$ 2.25	\$ 2.75	660	12.7%	5.5%	13.7%	3,133	399	2,735	173	2,960
TOTAL									\$ 2.78	\$ 2.60	\$ 2.82	\$ 2.73	\$ 2.79
Usable Surveys					3,504			AVERAGE FARE (Existing)	\$ 3.26	\$ 3.03	\$ 3.30	\$ 3.18	\$ 3.26
								AVERAGE FARE (Proposed)	16.96%	16.45%	17.04%	16.53%	16.99%
								Percent Change					
								Comparison Index			0.97		0.97

Table 17. Scenario 1 (Metro Transit & Suburban Transit Providers): Increase local fares by \$0.25

Mode	Customer Type	Service Type	Existing Fare	Proposed Fare	Survey Count	Minority Percentage	Low-Income Percentage	Average Daily Boardings (% of Service Type)	Average Daily Boardings	Minority Boardings	Non-Minority Boardings	Low-Income Boardings	Non-Low-Income Boardings
Bus	Adult	Peak Local	\$ 2.25	\$ 2.50	1,324	43.2%	22.7%	97.14%	75,779	32,536	43,244	17,131	58,648
		Off-Peak Local	\$ 1.75	\$ 2.00	615	51.9%	40.9%	88.87%	81,787	42,367	39,421	33,067	48,720
		Peak Express	\$ 3.00	\$ 3.25	720	17.8%	1.3%	98.77%	50,432	7,924	42,508	1,641	48,791
		Off-Peak Express	\$ 2.25	\$ 2.50	18	33.3%	18.8%	94.74%	7,024	1,696	5,329	903	6,121
	Youth/Senior	Peak Local	\$ 2.25	\$ 2.50	39	21.1%	19.4%	2.86%	2,197	463	1,735	427	1,770
		Off-Peak Local	\$ 0.75	\$ 1.00	77	14.5%	17.2%	11.13%	10,069	1,457	8,612	1,731	8,338
		Peak Express	\$ 3.00	\$ 3.25	9	0.0%	0.0%	1.23%	415	-	415	-	415
		Off-Peak Express	\$ 0.75	\$ 1.00	-	n/a	n/a	0.00%	-	0	-	0	-
METRO	Adult	Peak METRO	\$ 2.25	\$ 2.50	1,439	37.2%	18.9%	97.76%	35,166	13,078	22,087	6,652	28,513
		Off-Peak METRO	\$ 1.75	\$ 2.00	665	41.8%	27.7%	90.97%	32,724	13,687	19,038	9,072	23,653
	Youth/Senior	Peak METRO	\$ 2.25	\$ 2.50	31	27.6%	10.3%	2.11%	758	209	549	78	679
		Off-Peak METRO	\$ 0.75	\$ 1.00	65	9.5%	10.5%	8.89%	3,199	305	2,894	337	2,862
TOTAL									\$ 2.12	\$ 2.03	\$ 2.17	\$ 1.93	\$ 2.18
Usable Surveys					5,002	AVERAGE FARE (Existing)			\$ 2.39	\$ 2.28	\$ 2.42	\$ 2.18	\$ 2.43
All Surveys					7,725	AVERAGE FARE (Proposed)			12.62%	12.30%	11.50%	12.97%	11.47%
						Percent Change				1.07		1.13	
						Comparison Index							

Fare Change Outreach Plan and Results Summary

The Metropolitan Council and Metro Transit executed a fare change outreach plan from January through July 2017. Transit users, transit pass sponsors and users, various community and local government stakeholders, and legislators were engaged in this effort.

The following approaches were used in the fare change outreach plan:

- Use traditional outreach methods, including one-way promotional techniques (communications, web site, social media), earned media and paid media, and public meetings/hearings.
- Reach out to key constituencies and offer opportunities for engagement, including (but not limited to) small-group discussions, presentations, Q&A sessions, etc.
- Coordinate with suburban transit providers.
- Coordinate communications and promotion for outreach opportunities with local government partners, community organizations, other connection points for stakeholder groups.
- Schedule pop-up engagement events at busy transit stations to meet riders where they are.

Overview of Engagement and Comments Received

The Council sponsored four public hearings, eight open houses, a Metro Mobility customer forum, and presented information and received comments at many meetings sponsored by other agencies. Council members and staff connected with transit riders at about two dozen of the busiest transit stations and stops throughout the region.

More than 6,000 participants commented on the fare increase proposal during the public comment period – April 12 to June 26, 2017. People were encouraged to comment by sending comments directly to the Council, providing feedback at a public meeting or public hearing, or filling out a survey. Comments and surveys reflected 202 communities statewide, the majority of comments coming from communities in the metro area. Most comments were also from regular transit users. Of the 6,000 participants, 1,600 were from surveys; 4,400 were from emails, letters, comments, or postcards; and 150 were in-person responses.

The overwhelming majority of comments opposed a fare increase. Comments generally fell into the following categories:

- Increased fares would create a financial hardship for me.
- I could afford a \$0.25 increase, but I am concerned about low-income riders who could not afford an increase.
- Increasing fares will reduce ridership; the region should be encouraging ridership.
- I will change my transit-riding habits because of higher fares.
- A \$0.25 increase is reasonable if it doesn't result in a service cut.

- I expect more transit service if I'm going to pay a higher fare.
- Raising fares \$0.25 is reasonable.

There was no support for a fare increase above \$0.25. Comments indicated support for one reduced fare on fixed route transit for seniors, youth, and Medicare card holders. In addition, comments noted significant support for a permanent program providing a reduced fare for qualifying low-income customers.

Approved Fare Change

On July 26, 2017 the Metropolitan Council approved a fare change for transit service operated by all regional transit providers participating in the regional fare structure (Metro Transit and Suburban Transit Providers), with changes to be effective October 1, 2017 (Appendix B). The approved fare change increases local fares by \$0.25 and eliminates the Go-To card bonus on stored value purchases with no additional discount (Scenario C4, Table 14).

The approved fare change, Scenario C4, results in minority and low-income comparison indices of 1.03 and 1.07, respectively. This result indicates that the adverse impacts of the fare changes are borne by minority and low-income populations more than non-minority and non-low-income populations. However, the results are less than 1.25, Metro Transit's threshold for disparate impacts and disproportionate burden. Therefore, **no potential for disparate impacts to minority populations or disproportionate burdens to low-income populations are identified for the approved fare change.**

Summary

The FTA Circular 4702.1B requires transit agencies to conduct fare change equity evaluations before the implementation of proposed fare changes to identify potential impacts to minority and/or low-income populations. This evaluation reviewed the potential impacts to minority and low-income populations resulting from multiple fare change scenarios. With one exception (Scenario 4, flat fare for youth/senior riders with no other fare changes), this review finds that none of the proposed scenarios will result disparate impacts to minority populations or disproportionate burdens to low-income populations (Table 3).

The Metropolitan Council gathered input from the public and other stakeholders prior to passage of the approved fare change scenario, with more than 6,000 participants commenting on the fare increase proposal during the public comment period.

This review finds that the approved fare change – increase local fares by \$0.25 and eliminate the Go-To card bonus on stored value purchases with no additional discount – does not have potential for disparate impacts to minority populations or disproportionate burdens to low-income populations.

Appendix A: Metro Transit 2016 Rider Survey



NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

BUSINESS REPLY MAIL

FIRST-CLASS MAIL PERMIT NO. 2141 HOPKINS, MN

POSTAGE WILL BE PAID BY ADDRESSEE:

MARKETING DEPARTMENT
METRO TRANSIT
PO BOX 5703
HOPKINS MN 55343-7063



Bus Survey

We want to know what you think of us and the service we provide. Please use a blue or black pen, mark your answers by placing an X inside the correct box . To take this survey online, go to metrotransit.org/survey.

Please return the completed survey to the red bags hanging by the front or rear doors or mail it to us by December 1, 2016.

Tell us what you think about Metro Transit

Overall, how satisfied are you with your Metro Transit experience?

- Very satisfied
- Somewhat satisfied
- Neither satisfied nor dissatisfied
- Somewhat dissatisfied
- Very dissatisfied

On a scale of 0-10, where "10" is "extremely likely" and "0" is "not at all likely," how likely is it that you would recommend Metro Transit to a friend or colleague?

- Not at all likely Extremely likely
- 0 1 2 3 4 5 6 7 8 9 10

Please rate Metro Transit's performance on the following:

	<i>Excellent</i>	<i>Good</i>	<i>Fair</i>	<i>Poor</i>	<i>Unacceptable</i>	<i>Don't know</i>
Overall rating of Metro Transit service.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Paying my fare is easy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Personal safety while waiting	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Personal safety while riding.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Behavior of other passengers and atmosphere on bus	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Hours of operation for transit service meet my needs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Routes go where I need to go	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total travel time is reasonable.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Transferring is easy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reliability – service is on schedule.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Drivers operate vehicles in a safe and responsible manner.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Vehicles are clean	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Vehicles are comfortable	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Routes and schedules are easy to understand	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fares are easy to understand.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Availability of seats	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Easy to identify the right bus	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Vehicles are environmentally friendly	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Shelter conditions/cleanliness	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Availability of the route map and schedule.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Street/stop announcements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Courteous drivers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Accessible for people with disabilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Handling of concerns/complaints	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please rate how well we are communicating with you in the following areas:

	<i>Excellent</i>	<i>Good</i>	<i>Fair</i>	<i>Poor</i>	<i>Unacceptable</i>	<i>Don't use</i>
Clear, accurate route and/or schedule information.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Transit System Map	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Metro Transit information line (612-373-3333)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Printed schedules	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Information at shelters.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Information at bus stops.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
NexTrip real-time bus or train arrival information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
metrotransit.org	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Information about how to purchase or use Metro Transit fare cards (e.g. Go-To Cards).....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mobile app	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Onboard information cards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CONNECT onboard newsletter	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CONNECT digital newsletter	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please Place
1 inch wide
Tape Here

Please Place
1 inch wide
Tape Here

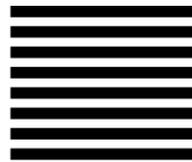
Please Place
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Tape Here



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BUSINESS REPLY MAIL

FIRST-CLASS MAIL PERMIT NO. 2141 HOPKINS, MN

POSTAGE WILL BE PAID BY ADDRESSEE:

MARKETING DEPARTMENT
METRO TRANSIT
PO BOX 5703
HOPKINS, MN 55343-7063

On which day(s) of the week do you usually ride the bus?



Less often than once per week

What is the name

& number of the route you are currently riding?

When you began your trip today, how did you get to your first bus stop or rail station?

PLEASE TAPE
HERE ONLY

10001

If

To make additional comments,
please visit metrotransit.org
and use the "Contact Us" form.



Bus Survey

We want to know what you think of us and the service we provide. Please use a blue or black pen, mark your answers by placing an X inside the correct box . To take this survey online, go to metrotransit.org/survey.

Leave the completed survey on your seat today or mail it to us by November 17, 2014.

FROM which ZIP code did you begin your trip TODAY?
(e.g., home ZIP code)? AND nearest intersection

&

TO which ZIP code are you traveling TODAY?
(e.g., destination ZIP code)? AND nearest intersection

&

On which day(s) of the week do you usually ride the bus?

- Weekdays (M-F) Weekends (Sa-Su) Both

When do you usually ride the bus?

- Rush hours (6:00 – 9:00 a.m. or 3:00 – 6:30 p.m.) Non-rush hours Special events

How many days per week do you usually ride the bus?

- 7 6 5 4 3 2 1 Less often than once per week

How did you pay for your fare today?

- Cash on bus Go-To Card Token SuperSaver
 Metropass Student Pass College Pass Free Ride Pass
 U-Pass Cash or credit card at rail platform ticket machine or more Other _____

What is the primary purpose of your trip today?

- Work Shopping or errands Environmental
 Sporting or special event School (K-12) Social or entertainment
 Medical Other _____ College/University
 Do not have access to car or other transportation
 Saves money on gas or auto expenses
 Avoid stress of driving/traffic congestion
 Predictable travel times compared to driving

What is the number of the bus route you are riding?

What type of bus route are you riding?

- Express Local More than 5 years

When you began your trip today, how did you get to your first bus stop or rail station?

- Someone else drove me Drove to a Park & Ride Walked Metro Transit advertising or free ride promotion
 Bicycled Drove to other parking (e.g. street parking) Special event (e.g. State Fair, sporting event)
 Other _____ Job change
 Coupon/free ride
 Other

If "bicycled," did you bring your bike with you on the bus?

- Yes No

How far would you estimate you traveled to get to your first bus stop or rail station?

- Less than 1/4 mile 1/2 - 1 mile 3 - 10 miles
 1/4 - 1/2 mile 1 - 2 miles More than 10 miles
Metro Transit Information Line – 612-373-3333
Bus drivers
Mobile app
NexTrip

How many TOTAL buses and/or trains will you take to complete your one-way trip?

- 1 2 3 4 5
 Other

How far would you estimate you will travel from your last bus stop or rail station to your destination?

- Less than 1/4 mile 1/2 - 1 mile More than 2 miles
 1/4 - 1/2 e 1 - 2 miles

Please estimate – in minutes – the total travel time of this trip. (minutes)



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PO BOX 5703
HOPKINS MN 55343-7063



Light Rail Survey

We want to know what you think of us and the service we provide. Please use a blue or black pen, mark your answers by placing an X inside the correct box . To take this survey online, go to metrotransit.org/survey.

Leave the completed survey on your seat today or mail it to us by December 1, 2016

Tell us what you think about Metro Transit

Overall, how satisfied are you with your Metro Transit experience?

- Very satisfied
- Somewhat satisfied
- Neither satisfied nor dissatisfied
- Somewhat dissatisfied
- Very dissatisfied

On a scale of 0-10, where "10" is "extremely likely" and "0" is "not at all likely," how likely is it that you would recommend Metro Transit to a friend or colleague?

- Not at all likely Extremely likely
- 0 1 2 3 4 5 6 7 8 9 10

Please rate Metro Transit's performance on the following elements of light rail service:

	<i>Excellent</i>	<i>Good</i>	<i>Fair</i>	<i>Poor</i>	<i>Unacceptable</i>	<i>Don't know</i>
Overall rating of Metro Transit service.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Paying my fare is easy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Personal safety while waiting.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Personal safety while riding.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Behavior of other passengers and atmosphere on light rail....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Hours of operation for transit service meet my needs.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Routes go where I need to go	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total travel time is reasonable.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Transferring is easy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reliability – service is on schedule.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Drivers operate vehicles in a safe and responsible manner....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Vehicles are clean	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Vehicles are comfortable	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Routes and schedules are easy to understand	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fares are easy to understand	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Availability of seats	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Vehicles are environmentally friendly	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Station conditions/cleanliness	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Availability of the route map and schedule	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Accessible for people with disabilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Handling of concerns/complaints	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please rate how well we are communicating with you in the following areas:

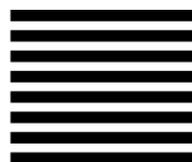
	<i>Excellent</i>	<i>Good</i>	<i>Fair</i>	<i>Poor</i>	<i>Unacceptable</i>	<i>Don't use</i>
Clear, accurate route and/or schedule information.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Transit System Map.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Metro Transit information line (612-373-3333)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Printed schedules	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Information at stations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Announcements at stations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Announcements on trains.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
NextTrip real-time bus or train arrival information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
metrotransit.org	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Information about how to purchase or use Metro Transit fare cards (e.g. Go-To Cards).....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mobile app	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Onboard information cards.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Adequate notice about station closures/alternate buses during service disruptions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CONNECT onboard newsletter.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CONNECT digital newsletter	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



To take this survey online
please visit metrotransit.org/survey



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METRO TRANSIT
PO BOX 5703
HOPKINS MN 55343-7063



Northstar Survey

We want to know what you think of us and the service we provide. Please use a blue or black pen, mark your answers by placing an X inside the correct box . To take this survey online, go to metrotransit.org/survey.

Please return the completed survey to the red bags hanging by the front or rear doors or mail it to us by December 1, 2016.

Tell us what you think about Metro Transit

Overall, how satisfied are you with your Metro Transit experience?

- Very satisfied
- Somewhat satisfied
- Neither satisfied nor dissatisfied
- Somewhat dissatisfied
- Very dissatisfied

On a scale of 0-10, where "10" is "extremely likely" and "0" is "not at all likely," how likely is it that you would recommend Metro Transit to a friend or colleague?

- Not at all likely Extremely likely
- 0 1 2 3 4 5 6 7 8 9 10

Please rate Metro Transit's performance on the following elements of train service:

	Excellent	Good	Fair	Poor	Unacceptable	Don't know
Overall rating of Metro Transit service.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Paying my fare is easy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Personal safety while waiting	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Personal safety while riding.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Behavior of other passengers and atmosphere on train.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Hours of operation for transit service meet my needs.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Routes go where I need to go	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total travel time is reasonable.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Transferring is easy.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reliability – service is on schedule.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Drivers operate vehicles in a safe and responsible manner....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Vehicles are clean	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Vehicles are comfortable.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Routes and schedules are easy to understand	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fares are easy to understand.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Availability of seats.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Vehicles are environmentally friendly	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Station conditions/cleanliness	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Courteous conductors	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Accessible for people with disabilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Handling of concerns/complaints	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please rate how well we are communicating with you in the following areas:

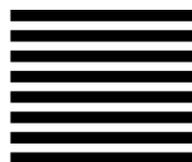
	Excellent	Good	Fair	Poor	Unacceptable	Don't use
Clear, accurate route and/or schedule information.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Transit System Map	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Metro Transit information line (612-373-3333)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Printed schedules.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Information at stations.....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Announcements at stations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Announcements on trains	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
NexTrip real-time bus or train arrival information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
metrotransit.org	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Information about how to purchase or use Metro Transit fare cards (e.g. Go-To Cards).....	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mobile app	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Adequate notice about station closures/ alternate buses during service disruptions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CONNECT onboard newsletter	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CONNECT digital newsletter	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



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Northstar Survey

We want to know what you think of us and the service we provide. Please use a blue or black pen, mark your answers by placing tan X inside the correct box . To take this survey online, go to metrotransit.org/survey.

Leave the completed survey on your seat today or mail it to us by November 10, 2014.

FROM which ZIP code did you begin your trip TODAY?
(e.g., home ZIP code)? AND nearest intersection

Other
 _____ & _____

TO which ZIP code are you traveling TODAY?
(e.g., destination ZIP code)? AND nearest intersection

_____ & _____

At which station did you BOARD the train TODAY?

- Big Lake Elk River Ramsey Anoka
- Fridley Coon Rapids-Riverdale Target Field

At which station did you EXIT the train TODAY?

- Big Lake Elk River Ramsey Anoka
- Fridley Coon Rapids-Riverdale Target Field

On which day(s) of the week do you usually ride Northstar?

- Weekdays (M-F) Weekends (Sa-Su) Both

Have you ever taken Northstar for special events?

- Yes, please specify: _____ No

How many days per week do you usually ride Northstar?

- Less than once per week 1 2 3 4 5 6 7

How did you pay for your fare today?

- Cash/Credit Card/ token at ticket machine or on bus Go-To Card Free Ride Pass
- If so, what kind of ticket did you purchase? Metropass Online (Interactive Ticketing)
- Full Fare Single Ride StudentPass Coupon
- Full Fare Round Trip Ticket U- Pass Other _____
- Reduced Fare (senior, youth, medicare) CollegePass
- Person with Disability
- Event 6 Hour Pass
- Day Pass

Does your employer, organization or agency offer transit passes?

- Yes No I don't know

If yes, does it share part of the cost?

- Yes No I don't know

What is the primary purpose of your trip today?

- Work Shopping or errands Social or entertainment
- College/University School (K-12) Sporting or special event
- Other _____

What is the ONE main reason you use Northstar?

- More convenient because: _____ Reduce environmental footprint
- Saves time Do not have access to car or other transportation
- Saves money on parking Saves money on gas/auto expenses
- Subsidized by employer or other organization Avoid stress of driving/traffic congestion
- Provides regular exercise Predictable travel times compared to driving
- Prefer car-free or car-light lifestyle Other _____

When you began your trip today, how did you get to the Northstar station?

- Someone else drove me Drove to a Park & Ride Drove to other parking (e.g. , street parking)
- Walked Bicycled Transfer from bus
- Transfer from light rail Other _____

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To make additional comments,
please visit metrotransit.org
and use the "Contact Us" form.

Appendix B: Metropolitan Council Transportation Committee Report

Transportation Committee

Meeting date: July 24th, 2017

For the Metropolitan Council meeting of July 26th, 2017

Subject: Regional Fare Adjustment Recommendations

District(s), Member(s): All

Policy/Legal Reference: Public Accountability Policy 2-1, Public Hearings Procedure 2-1b; Transit Fare Policy Changes 3-2-6, Implementing Procedure 3-2-6a; CFR 49 Parts 37 & 38 – Paratransit ADA

Staff Prepared/Presented: Brian J. Lamb, General Manager, Metro Transit (612-349-7510)

Nick Thompson, Director, MTS (651-602-1754)

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Gerri Sutton, Asst. Director Contracted Transit Services, MTS (651-602-1672)

Nick Eull, Senior Manager of Revenue Operations, Metro Transit (612-349-7364)

Michelle Fure, Manager of Public Involvement, Regional Administration (651-602-1545)

Division/Department: Metro Transit, Metropolitan Transportation Services

Proposed Actions

1. That the Metropolitan Council accept the public comment report for proposed fare adjustments and authorize the recommended fare change proposal (attachment B) for service operated by all regional transit providers participating in the regional fare structure, with changes to be effective October 1, 2017 or as noted on the attached proposal.
2. That the Metropolitan Council directs staff to develop a fare policy recommendation by EOY 2017 for Council consideration to help determine when future fare adjustments should be considered and how future fare increases will continue to drive towards:
 - a. Creating solutions for a more sustainable funding structure
 - b. Understanding the best way to grow ridership while equalizing subsidies across modes to the best extent possible
 - c. Mitigating disproportionate impacts of increased fares on people of color, low income communities, youth and seniors, and persons with disabilities
 - d. Addressing the future considerations included in the Equity Advisory Committee recommendation from July 18, 2017.

Background

- As a result of inflationary pressures, growth in Metro Mobility demand, and forecasted reductions in Motor Vehicle Sales Tax (MVST) receipts from previous estimates, the Metropolitan Transportation Division is facing a projected State Fiscal Year (SFY) 2020-2021 deficit of nearly \$110 million. One of the recommended solutions to help resolve this projected deficit is a fare adjustment.
- Federal guidelines and Metropolitan Council policy require that fare adjustments be reviewed through a public hearing and public comment process prior to adoption. Public comments were accepted from April 12 through June 26th, 2017. A full public comment report is available.
- Staff have developed a combination of measured and balanced transit fare adjustment recommendations for revenue enhancements, to help address this shortfall with the minimum of possible impacts to the riding public and the

region as a whole. These recommendations include feedback gained through the public comment process.

- With the recommended fare adjustments, ridership is estimated to decrease 3.8M rides (4.7%) in year one throughout the region, with rides expected to return over an 18-24 month period.
- Implementation of new fares is scheduled for October 1st, 2017.

Rationale

The proposed fare increase will help sustain 2017 EOY service levels through the remaining current biennium. The recommended proposed fare adjustments will provide one lever to reduce the Metropolitan Transportation Division's projected SFY 2020-2021 budget deficit but will not resolve the entire structural deficit.

Thrive Lens Analysis

A fare increase will impact all public transit customers in the Twin Cities region. Staff have analyzed and included recommendations for mitigating increases to the region's most transit dependent customers with adoption of the Transit Assistance Pass (TAP) program with this fare adjustment. These proposals have also passed a Title VI analysis, which tests whether proposals have a disparate impact on low-income communities, or communities of color. In addition, staff have included other options that could help offset a fare increase for seniors, youth and Medicare card holders. The public comment process engaged a significant number of stakeholders and yielded more than 6,000 comments. Among the 1,600 surveys submitted, about 39% identified as non-white, higher than the percentage of the region's population identified as people of color (26%).

Funding

The Metropolitan Council last took action to increase fares effective Oct. 1, 2008. This fare adjustment recommendation proposes fare adjustments for services operated by all regional transit providers participating in the regional fare structure.

Known Support / Opposition

More than 6,000 comments and surveys were submitted during the public comment process. The overwhelming majority noted opposition to any increases to regional transit fares. Survey respondents indicated overwhelming support for implementing a permanent program to provide reduced fares for qualifying low-income riders. Several organizations also weighed in during the comment period, with both opposition and support for a 25-cent increase to regular-route transit fares or for the fare increase to be applied evenly to local and express service. The Council's Equity Advisory Committee approved the following recommendation related to this action:

- i. 25-cent increase to all express route transit fares; no increase to regular route transit fares
- ii. Pursue measures that protect fares for low-income and transit-reliant populations (including the Transit Assistance Program and partnerships with community organizations to provide a discounted pass program like Metropass)
- iii. Use funds that previously went to Go-To Card purchase bonuses to help pay for protection programs for low-income and transit-reliant populations

Regional Fare Adjustment Recommendation – Attachment A

Major Fare Adjustments	Adjustment Amount	Projected 2018 Net Impact
Local and Express Fares	\$0.25 Increase	\$6,530,000
Metro Mobility	\$0.50 Base Increase \$0.75 Distance Surcharge (non-ADA)	\$1,300,000
Transit Link	\$1.60 Avg. Increase \$0.75 Distance Surcharge	\$265,000
Transit Assistance Pass (TAP)	\$1.25 Fare (New Program)	(\$3,000,000)
Limited Mobility	\$0.25 Increase	\$370,000
Eliminate Peak Surcharge for Senior, Youth, and Mobility	\$1.00 Fare at All Times (\$0.25 Increase from Off-Peak Levels, No Peak Surcharge)	(\$665,000)
Transit Schools Discount	Eliminate Discount (5% - 10%)	\$10,000
Eliminate Stored Value Bonus	Eliminate 10% Bonus	\$1,900,000
Total 2018 Est. Revenue Increase		\$6,710,000

***18-24 month ridership recovery expected; increased revenues in future years**

**Regional Fare Adjustment Recommendation
For proposed implementation on October 1, 2017 -
Attachment B**

Cash Fare Increases:	<u>Current</u>	<u>Proposed</u>
Local Off-Peak	\$1.75	\$2.00
Local Peak	\$2.25	\$2.50
Express Off-Peak	\$2.25	\$2.50
Express Peak	\$3.00	\$3.25
Metro Mobility		
Demand Response		
Off-peak	\$3.00	\$3.50
Peak	\$4.00	\$4.50
Distance Surcharge (non-ADA, trips greater than 15 miles)	None	\$0.75
All-You-Can-Ride Passes	Not Accepted	Not Accepted
Dial-A-Ride (Transit Link)	\$2.25 - \$6.75	\$3.50 Off-Peak, \$4.50 Peak
Distance Surcharge (trips greater than 15 miles)	None	\$0.75
All-You-Can-Ride Passes	Accepted	Cash and Stored Value Only
Northstar Fares (to MPLS)		
Big Lake	\$6.00	\$6.25
Elk River	\$4.50	\$4.75
Ramsey	\$3.50	\$3.75
Anoka	\$3.00	\$3.25
Coon Rapids/Riverdale	\$3.00	\$3.25
Fridley	\$3.00	\$3.25
Station-to-Station	\$3.00	\$3.25
Senior, Youth, Medicare Fares	\$0.75 Off-Peak	\$1.00 – Peak & Off-Peak
Limited Mobility (All Times)	\$0.75	\$1.00
Downtown Zone (All Times)	\$0.50	No Change
Transit Assistance Pass (TAP) Fare	N/A	\$1.25

Additional Adjustments

	<u>Current</u>	<u>Proposed</u>
Transfers and Transfer Policy		No Change
Rush Hours		No Change
31-Day Pass		
Local Off-Peak	\$59	\$65
Local Peak	\$85	\$90
Limited Mobility	\$31.50	\$36
Express	\$113.50	\$120
Stored Value Bonus	10%	No Bonus
Transit Schools Fare Discount	5% - 10%	No Discount
6-Hour Pass	\$3.50 - \$4.00	Replaced by All-Day Pass
All-Day Pass		
Full Fare	\$3.50 - \$4.50	\$4.00 - \$5.00
Reduced Fare, Limited Mobility	\$1.50 - \$4.50	\$2.00 (w/no peak surcharge for reduced fare)
Downtown All-Day Pass	\$1.00	No Change
24-Hour Pass	\$6.00	\$6.50
10-Ride Farecards		
Full-Fare	\$18.50	\$20.50
Young Adult	\$13.50	\$15.00
7-Day Pass	\$22.00	\$24.00
Tokens (Bags of 50)	\$87.50	\$100.00
One Ride Tickets	\$2.70/ea.	\$2.90/ea.
Visitor Pass	\$4.50	\$5.00

Title VI Service Equity Analysis

C Line and Route 19

January 2019

Metro Transit



SRF No. 12213

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Introduction

Title VI Service Equity Analysis

The Federal Transit Administration (FTA) requires recipients of federal funding, including Metro Transit, to conduct a Title VI Service Equity Analysis for any proposed service change that meets the agency's "major service change" threshold. This analysis fulfills this requirement as it relates to the service changes and additions included in the proposed C Line and Route 19 service changes.

The C Line Project

Metro Transit is planning improvements to the Route 19 corridor with the C Line rapid bus project. The C Line will substantially replace Route 19, running primarily on Penn Avenue and Olson Memorial Highway (Figure 1). Rapid bus brings better amenities, faster service, and a more comfortable ride. Following the A Line, the C Line will be the second project to be completed as part of Metro Transit's network of rapid bus lines.

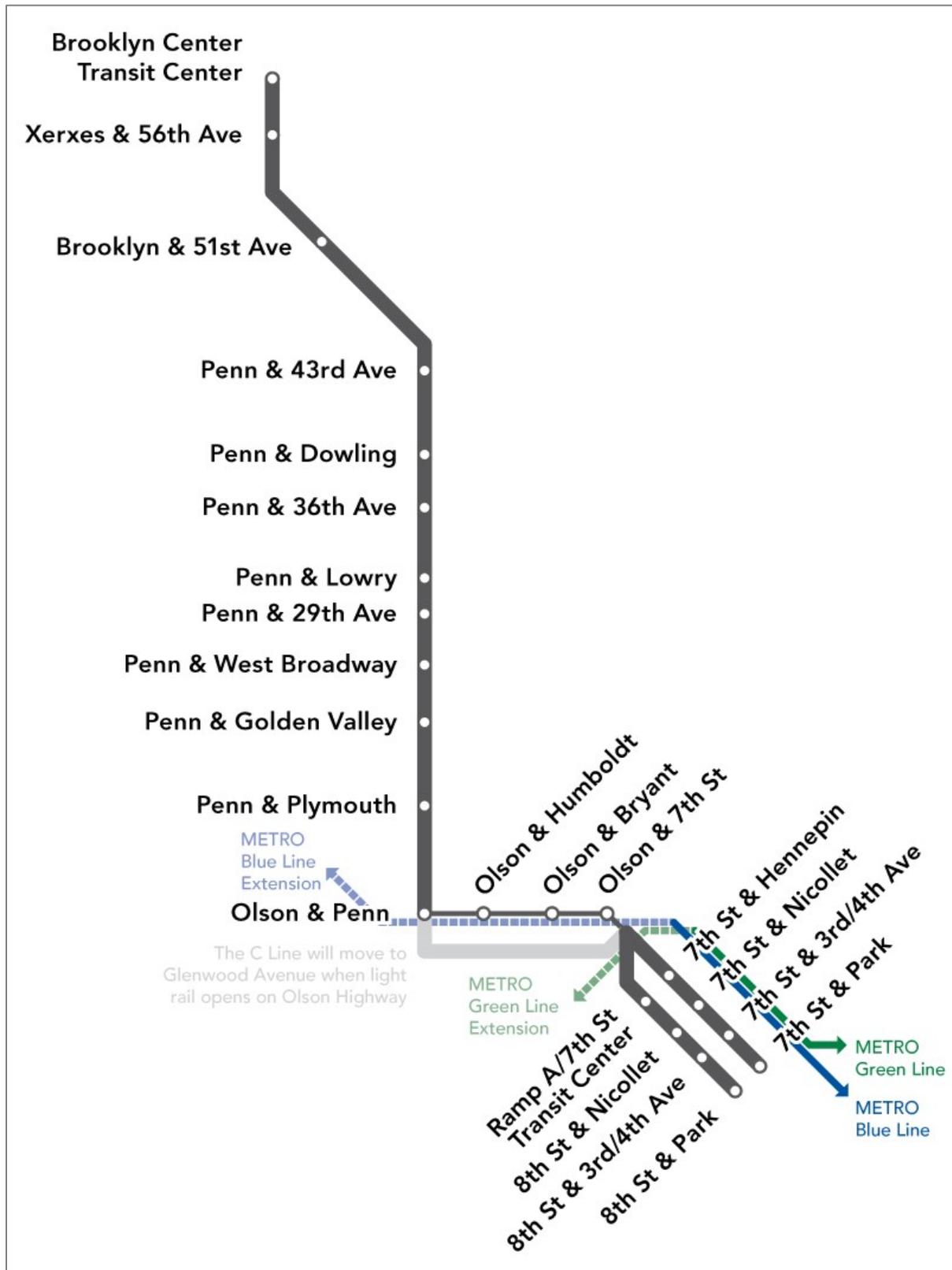
The C Line will operate between downtown Minneapolis and the Brooklyn Center Transit Center once every 10 minutes on weekdays, and every 10-15 minute on Saturdays and Sundays. It will serve 23 enhanced stations, spaced every quarter to half mile. Route 19 will continue to operate but with minor alignment changes and at reduced frequency. These changes would meet the threshold for a major service change as defined in Metro Transit's Title VI Program Major Service Change Policy.¹

Since 2015, the C Line project has been the subject of over nine open houses and dozens of community events and presentations to neighborhood associations and the Metropolitan Council. Station area planning and design development, Route 19 service planning, and construction coordination are among the outreach efforts undertaken by Metro Transit for the C Line project.

The C Line is scheduled to open for revenue service in the spring of 2019, with Route 19 service changes implemented concurrently. Long term, a future realignment of the C Line to Glenwood Avenue would occur in coordination with light rail transit opening on Olson Memorial Highway and the completion of stations on Glenwood Avenue. Service changes related to the future C Line realignment would be evaluated separately.

¹¹ <https://www.metrotransit.org/Data/Sites/1/media/pdfs/titlevi/TitleVIpolicyAfinal.pdf>

Figure 1. C Line Project Map



Title VI Principles and Definitions

Title VI and Environmental Justice

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance. Title VI 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.”

In 1994, President Clinton issued Executive Order 12898, which states that each federal agency “shall make achieving environmental justice part of its mission by identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.” Through this Executive Order, Title VI was identified as one of several Federal laws that should be applied “to prevent minority communities and low-income communities from being subject to disproportionately high and adverse environmental effects.”

To provide direction to recipients of federal funding, the FTA issued Circular 4702.1B, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*, in 2012, which replaced Circular 4702.1A issued in 2007. FTA Circular 4702.1B outlines Title VI evaluation procedures for recipients of FTA-administered transit program funds and includes guidance for a variety of equity evaluations. This Title VI Service Equity Analysis for the C Line and Route 19 satisfies the FTA requirement to evaluate service changes that meet an agency’s major service change threshold.

Title VI Definitions of Minority and Low-Income Populations

A note on the language and terminology used in this report: Many of the terms used in this report such as “minority” and “low-income” may not be consistent with efforts by Metro Transit and the Metropolitan Council to use respectful and inclusive language. However, these terms are used in this report to match the terminology used in the FTA Title VI Circular and other federal guidance.

Minority

The FTA defines a minority person as one who self-identifies as American Indian/Alaska Native, Asian, Black or African American, Hispanic or Latino, and/or Native Hawaiian/Pacific Islander. For the purposes of this evaluation, non-minority persons were defined as those who self-identify as white and not Hispanic or Latino. All other persons, including those identifying as two or more races and/or ethnicities, were defined as minority persons. The distribution of minority and non-minority populations within a half-mile of proposed C Line stations, and those

within a quarter-mile of the existing and proposed bus stops served by Route 19 (here referred to as the “service change area”), is shown in Figure 2.

Low-Income

While low-income populations are not an explicitly protected class under Title VI, the FTA recognizes the inherent overlap between Title VI and Environmental Justice principles. Subsequently, it requires transit providers to evaluate the impact of service and fare changes to low-income populations and to identify any disproportionate burden placed on those populations by the proposed changes. The FTA defines a low-income person as one whose household income is at or below the poverty guidelines set by the Department of Health and Human Services (HHS). HHS poverty guidelines are based on household size and the number of related children less than 18 years of age.

However, FTA Circular 4702.1B also allows for low-income populations to be defined using other established thresholds that are at least as inclusive as those developed by HHS. Correspondingly, this C Line and Route 19 Title VI Service Equity Analysis used 2016 U.S. Census Bureau poverty thresholds, a more sophisticated measure of poverty that considers not only family size and the number of related children present, but also, for one- and two-person family units, whether elderly or not. The U.S. Census Bureau’s poverty thresholds are used for statistical purposes, while HHS’s poverty guidelines are used for administrative purposes.² The U.S. Census Bureau 2016 poverty thresholds by family size and presence of related children under 18 years is shown in **Error! Reference source not found..**

The distribution of low-income and non-low-income populations within the service change area is shown in Figure 3, based on 2016 U.S. Census Bureau poverty thresholds.³

² The distinctions between poverty thresholds and guidelines are described further at <https://aspe.hhs.gov/frequently-asked-questions-related-poverty-guidelines-and-poverty#programs>; and <http://www.irp.wisc.edu/faqs/faq1.htm>.

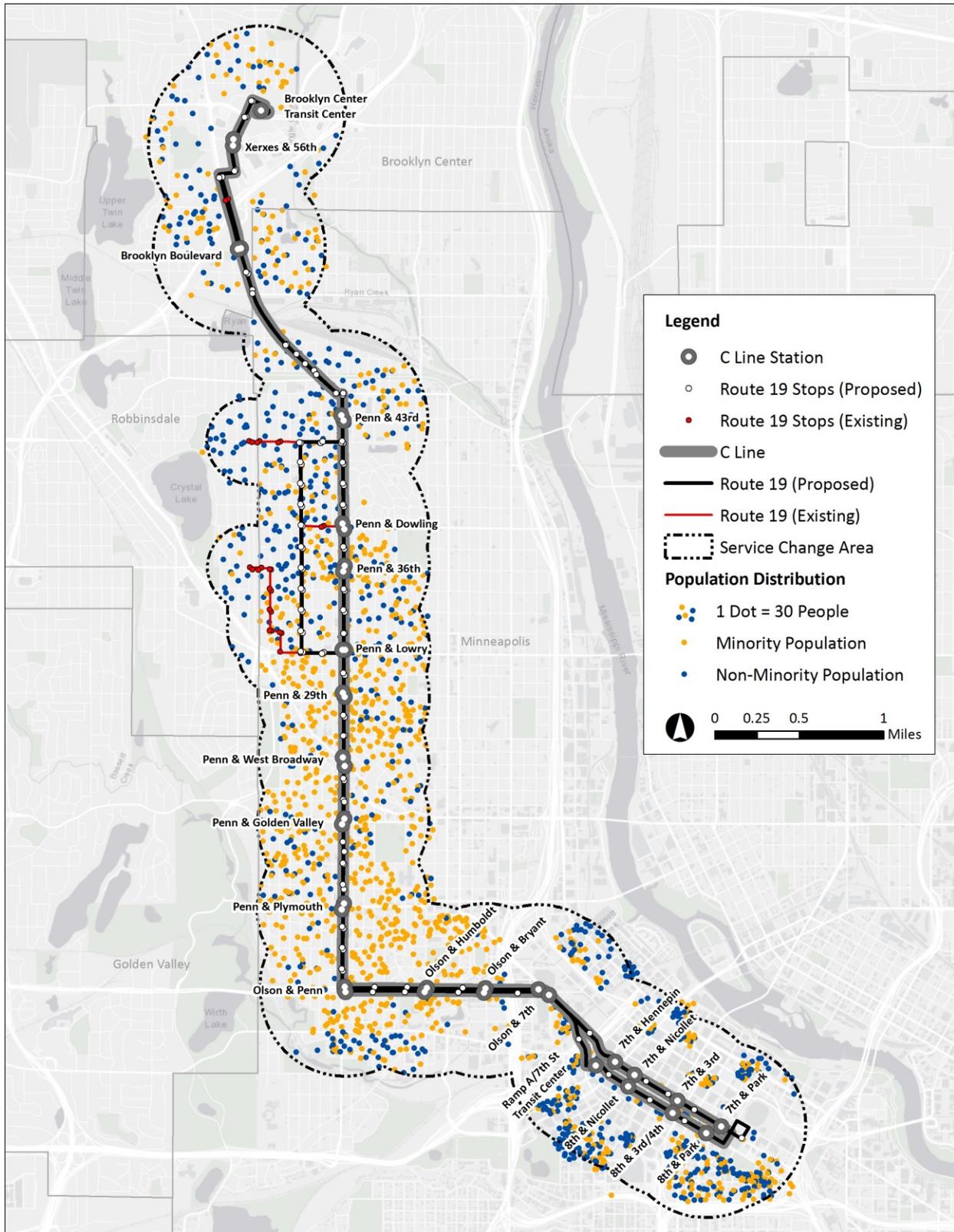
³ The 2016 poverty thresholds were used to match the use of U.S. Census Bureau 2012-2016 American Community Survey 5-year estimates, the most up-to-date data available at the time of analysis.

Table 1. U.S. Census Bureau Poverty Thresholds (in Dollars), 2016

Size of family unit	Weighted Average Poverty Thresholds (\$)	Poverty Threshold (\$) by Related children under 18 years								
		None	One	Two	Three	Four	Five	Six	Seven	Eight or more
One person (unrelated individual)	12,228									
Under 65 years	12,486	12,486								
65 years and over	11,511	11,511								
Two people	15,569									
Householder under 65 years	16,151	16,072	16,543							
Householder 65 years and over	14,522	14,507	16,480							
Three people	19,105	18,774	19,318	19,337						
Four people	24,563	24,755	25,160	24,339	24,424					
Five people	29,111	29,854	30,288	29,360	28,643	28,205				
Six people	32,928	34,337	34,473	33,763	33,082	32,070	31,470			
Seven people	37,458	39,509	39,756	38,905	38,313	37,208	35,920	34,507		
Eight people	41,781	44,188	44,578	43,776	43,072	42,075	40,809	39,491	39,156	
Nine people or more	49,721	53,155	53,413	52,702	52,106	51,127	49,779	48,561	48,259	46,400

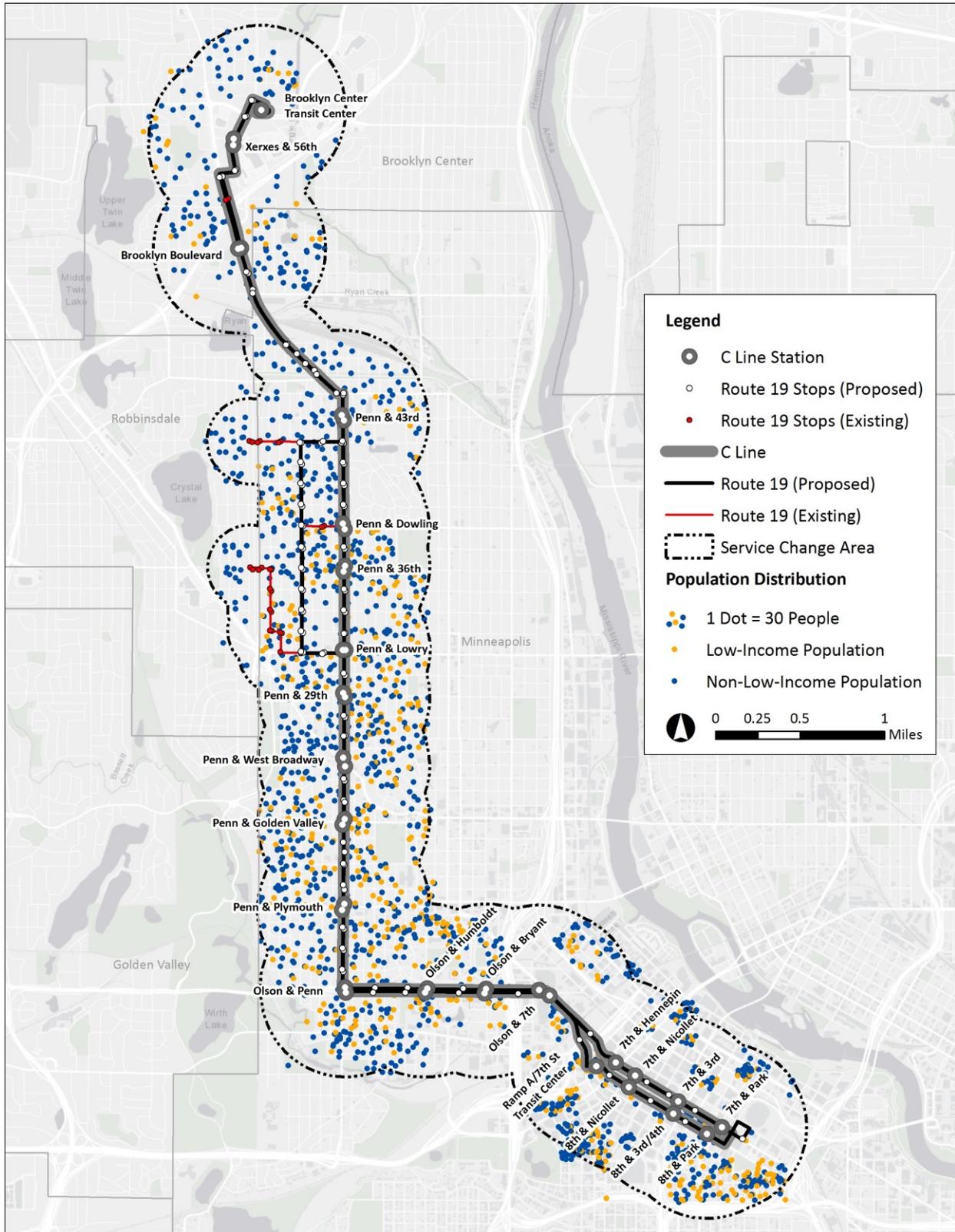
Source: <https://www.census.gov/data/tables/time-series/demo/income-poverty/historical-poverty-thresholds.html>

Figure 2. Distribution of Minority and Non-Minority Populations



Source: U.S. Census Bureau 2010 Decennial Census; 2012-2016 American Community Survey 5-Year Estimates; Metropolitan Council.

Figure 3. Distribution of Low-Income and Non-Low-Income Populations



Source: U.S. Census Bureau 2010 Decennial Census; 2012-2016 American Community Survey 5-Year Estimates; Metropolitan Council.

Disparate Impact, Disproportionate Burden, and the Four-Fifths Threshold

The FTA defines “disparate impacts” as facially neutral policies or practices that disproportionately affect members of a group identified by race, color, or national origin, and the recipient’s policy or practice lacks a substantial legitimate justification. If the results of the analysis indicate a potential for disparate impacts, further investigation is required. Metro Transit has defined its disparate impact threshold using the “four-fifths rule.” The four-fifths rule states that there may be evidence of disparate impacts if:

- Benefits are being provided to minority populations at a rate less than 80 percent (four-fifths) of the benefits being provided to non-minority populations, or
- Adverse effects are being borne by non-minority populations at a rate less than 80 percent (four-fifths) of the adverse effects being borne by minority populations.

The four-fifths rule originates from employment law but is applied in this setting to compare the distribution of benefits and/or adverse impacts among various population groups. The four-fifths rule suggests that a selection rate for any racial, ethnic, or gender group that is less than four-fifths or 80 percent of the rate for the group with the highest selection rate will be regarded as evidence of adverse impact. Although it is a “rule of thumb” and not a legal definition, it is a practical way for identifying adverse impacts that require mitigation or avoidance. Metro Transit’s decision to use the four-fifths rule was subject to a formal public outreach process before being adopted by the Metropolitan Council in 2013.

Metro Transit uses a similar approach when comparing the distribution of benefits and adverse impacts for low-income and non-low-income populations. However, when the distributions for low-income populations fall outside of the four-fifths threshold, this is referred to as a disproportionate burden rather than a disparate impact.

Policies Applied to the C Line and Route 19 Service Changes

In this analysis, if the quantitative results indicate that the average percent change in service levels for minority/low-income populations is less than 80 percent of the benefits being provided to non-minority/non-low-income populations, this could be evidence of disparate impacts/disproportionate burdens. In this case, additional analysis will be conducted, and potential mitigation measures will be identified if necessary.

A service change that results in a disparate impact may only be implemented if:

- There is a substantial legitimate justification for the proposed service change, and
- There are no alternatives that would have a less disparate impact while still accomplishing the transit provider’s legitimate program goals.

Service Equity Analysis Methodology

A geographic information systems (GIS)-based approach was used in this analysis to measure the location and magnitude of proposed service changes and compare the distribution of impacts and benefits to minority, non-minority, low-income, and non-low-income populations. The analysis consists of five steps:

1. Model current and proposed service levels.
2. Spatially allocate current and proposed transit service levels to population groups based on intersection between service buffer and census block centroid.
3. Calculate the percent change in service between the current and proposed service levels for each census block.
4. Calculate the average percent change in service for all minority/low-income and non-minority/non-low-income populations within the service change area for the current and proposed transit service.
5. Determine whether the proposed service will result in disparate impacts or disproportionate burdens by applying the disparate impact and disproportionate burden policies.

This analysis used the number of trips available to each census block as a measure of overall transit service levels. Common improvements to transit service, such as increased frequency and increased span of service, will result in an increase in the number of trips available. The addition of service to a new area will also result in an increase in the number of trips available to the surrounding areas. Total weekly trips were used in this analysis, accounting for Saturday and Sunday service levels, in addition to those on weekdays.

Modeling Current and Proposed Service Levels

Two networks were modeled to represent the current service levels and the proposed service levels. This analysis considered only the routes with proposed service changes (i.e., Route 19 and C Line). The current service level network represents the conditions as of fall 2018 for Route 19; this assumes regular service and does not consider the presence of any current or anticipated short-term detours. The proposed service level network represents the conditions after the proposed C Line and Route 19 service changes are implemented concurrently in spring 2019. A high-level summary of the proposed changes is included below.

- **C Line:** New rapid bus line serving the Penn Avenue corridor in north Minneapolis with more frequent and faster service between downtown Minneapolis and the Brooklyn Center Transit Center. The rapid bus line will serve 23 enhanced stations (37 station platforms), spaced every quarter to half mile. On weekdays, the C Line will operate once every 10 minutes for most of its 20-hour span of service (approximately 5:00 a.m. to 1:00 a.m.). On Saturday and Sunday, service will be available once every 10-15 minutes for most of the same 20-hour span.
- **Route 19:** Reduce frequency to 30 minutes, while maintaining local (“front door”) service to most existing bus stops served by Route 19, spaced every eighth to quarter mile. Eliminate 19H and 19Y branches serving west of Penn Avenue. Introduce a new branch to serve Thomas Avenue between 42nd Avenue and Lowry Avenue with three southbound trips in the morning and three northbound trips in the afternoon, all of which serve the Brooklyn Center Transit Center and downtown Minneapolis.

Current and proposed service levels were measured at the bus stop (or station) level. In doing so, service levels are not attributed to segments of routes that do not have bus stops (i.e., where a bus passes through an area but does not actually serve it).

Trips for each current and proposed route were allocated to all census blocks whose centroid was located within a quarter-mile of bus stops served by a route, or a half-mile of rapid bus line stations. The quarter-mile and half-mile distances are standard maximum walking distances to access local and rapid bus service, respectively.

The proposed Route 19 will serve all C Line stations. Thus, in this analysis, service levels measured at locations where there are C Line stations included weekly trips from Route 19 with a service area of a quarter-mile, in addition to the weekly trips from the C Line with a service area of a half-mile.

Assigning Transit Trips to Census Blocks

Demographic information is available at the census block level from the 2010 U.S. Census Bureau Decennial Census. However, the most recent demographic dataset published by the U.S. Census Bureau, the 2012-2016 American Community Survey (ACS) 5-year Estimates, is available only at the census block group level. The 2012-2016 ACS dataset contains estimates that are based on the most recent five years of data collected by the U.S. Census Bureau (2012 through 2016).⁴

Census block groups and blocks differ in their geographic makeup. Census blocks are the smallest geographic unit used by the U.S. Census Bureau and are bounded by roadways or water features in urban areas. A census block group is typically made up of a cluster of

⁴ As a collection of estimates, the 2012-2016 ACS data are subject to error, but remain the most reliable and current demographic data readily available for the service area.

approximately 40 blocks. Due to their size, it can be difficult to identify location-specific impacts using only block group data.

To provide more granularity and detail to the analysis, minority and low-income populations were estimated at the census block level using a combination of 2012-2016 ACS data and 2010 Decennial Census data. The 2012-2016 ACS populations for each block group were allocated to their corresponding blocks using the proportion of total population for that block and block group found in the 2010 Decennial Census. For example, if the 2010 data showed that a block contained 10 percent of the total population within its parent block group, it was assumed that this block contains 10 percent of the minority and low-income populations estimated in the 2012-2016 ACS data. While this approach assumes that the percentage of minority and low-income populations are uniformly distributed throughout the block group, it allows for a more precise analysis than using the block groups as a whole. This approach also allows for the identification of zero-population areas within each block group and is consistent with the methodology used in previous Metro Transit Title VI evaluations.

Calculating Change in Service Level by Census Block

The absolute change in service level was calculated for each census block by subtracting the current number of weekly trips available from the proposed number of weekly trips available. Two networks were modeled to represent the current service levels and the proposed service levels.

- **Current:** available weekly trips from Route 19 as of fall 2018
- **Proposed:** available weekly trips from the C Line and modified Route 19, implemented concurrently in spring 2019

This analysis considered only the routes with proposed service changes (i.e., Route 19 and C Line); it did not measure the number of available trips from all fixed-route transit service in the service change area.⁵

After the absolute change between the proposed and current service networks was calculated, the percent change in service was calculated by dividing the change in weekly trips by the existing number of weekly trips. To minimize artificial skewing from newly served areas, all percent changes greater than 100 percent, including those that are incalculable due to zero existing service, were adjusted to a maximum value of 100 percent.

⁵ Routes 5, 721, and 724 share alignments with the current/proposed Route 19 and the proposed C Line in the northern quarter of the study area: between 44th Avenue and the Brooklyn Center Transit Center, largely along Osseo Road/Brooklyn Boulevard and Xerxes Avenue. However, no changes are proposed for Routes 5, 721, and 724. Given this, the number of weekly trips available from these three routes were not included in the current or proposed service networks modeled in this analysis.

Determining Average Percent Change in Service

The average percent change in service for each target population was calculated by weighting the percent change in each census block by the target population served in that census block. For example, the average percent change in service for minority populations was completed by multiplying each census block's minority population by the percent change in service for that block, summing the results for the blocks in the service change area, and dividing that sum by the total minority population for the blocks in the service change area. The formula used for these analyses is shown below.

$$Avg \% \Delta = \frac{\sum (Population_i \times Percent\ Change_i)}{\sum Population_i}$$

Where:

Population_i = Target population of census block *i*.

Percent Change_i = Percent change in service levels for census block *i*.

In this manner, the weighted percent change was calculated individually for the total population, minority population, non-minority population, low-income population, and non-low-income population. Using this method, the impacts of the service changes for each census block are proportionate to both the demographics of the census blocks and the degree of service level change.

Evaluation of Impacts

Average Service Level Change by Population Group

The service level impacts resulting from the proposed C Line and Route 19 service changes for Title VI populations are assessed by calculating a comparison index between the minority and non-minority results, and between the low-income and non-low-income results. The comparison index is measured as the ratio between the minority/low-income results and the non-minority/non-low-income results. A comparison index less than 0.80 indicates the potential for disparate impact. However, as described in greater detail below, minority and low-income persons are expected to receive a larger benefit (a comparison index greater than 1.00) from the proposed C Line and Route 19 service changes relative to non-minority and non-low-income persons, respectively.

In total, 64,690 people live in census blocks within the proposed C Line and Route 19 service change area. This population includes 37,782 minority persons, 26,908 non-minority persons, 16,572 low-income persons, and 44,604 non-low-income persons (Table 2).⁶ The average percent change in service levels for each target population group is summarized in Table 2.

Table 2. Average Service Level Change by Population Group

Population Group	Population of Service Change Area	Average Percent Service Change
Minority	37,782	71.1%
Non-Minority	26,908	70.0%
Comparison Index		1.02
Low-Income	16,572	72.9%
Non-Low-Income	44,605	68.8%
Comparison Index		1.06
Total	64,690	70.7%

Overall, the proposed service changes result in a dramatic increase in transit service availability for all population groups. The average individual in the service change area – regardless of race, ethnicity, or low-income status, is expected to experience a 70.7 percent increase in transit service (Table 2).

⁶ It should be noted that the ACS cannot determine low-income status for persons residing in group quarters. This includes, but is not limited to, populations living in dormitories, group homes, nursing facilities, and correctional facilities. For this reason, the combined total of low-income and non-low-income populations is 61,176, slightly less than that estimated population as a whole.

The average minority individual in the service change area would experience a 71.1 percent increase in transit service. This value is higher than the average increase of 70.0 percent for non-minority individuals. **Therefore, this analysis identifies no potential for disparate impact to minority populations as a result of the proposed service changes.**

The average low-income individual in the service change area would experience a 72.9 percent increase in transit service. This value is higher than the average increase of 68.8 percent for non-low-income individuals. **Therefore, this analysis identifies no potential for disproportionate burdens to low-income populations as a result of the proposed service changes.**

Service Level Change by Census Block

The percent change in service level, as measured by weekly trips by census block, is shown in Figure 4. Areas with zero population are excluded from the figure. Nearly all census blocks within the service change area would receive an increase in service.

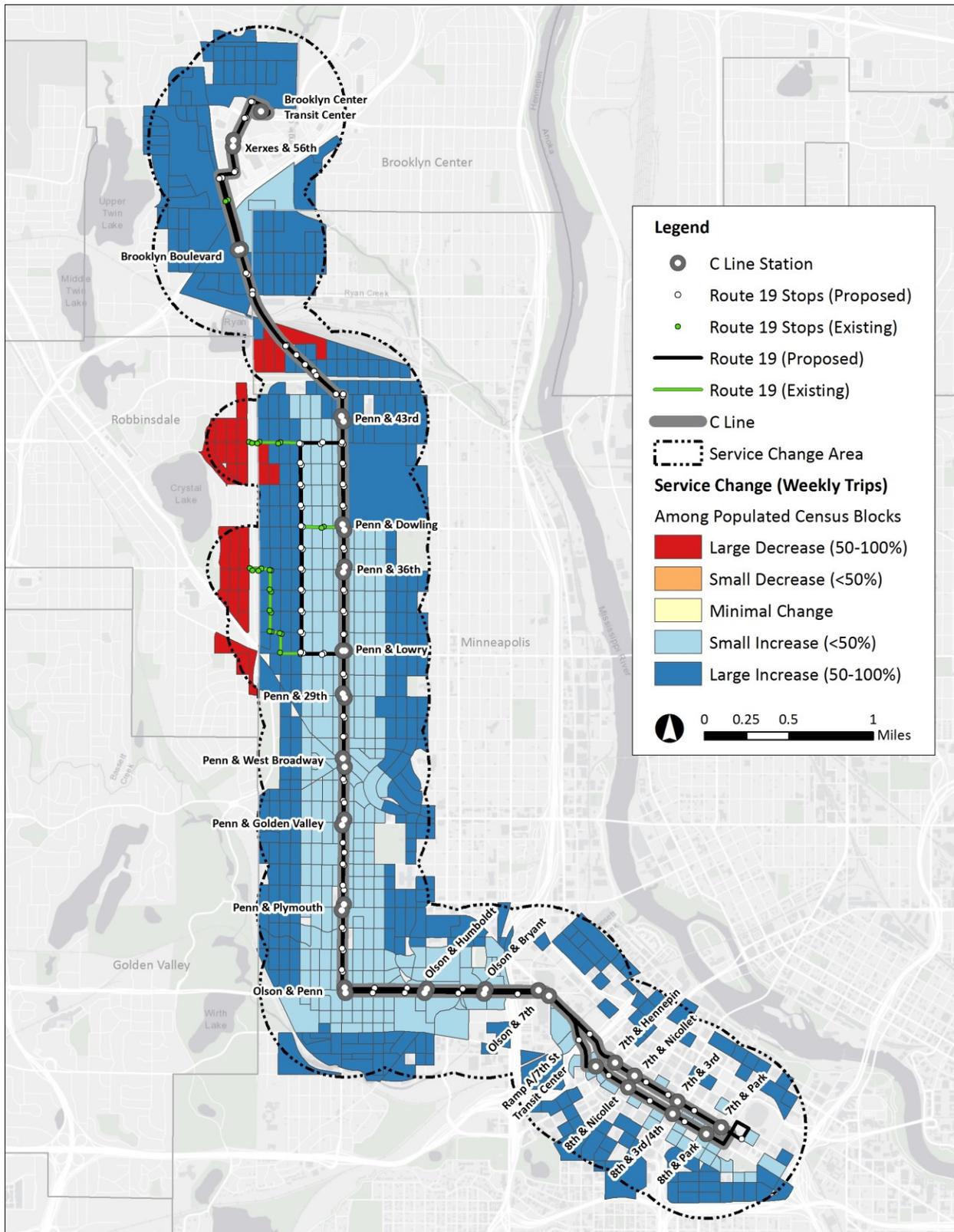
- Census blocks where 97 percent of service change area population live would receive at least a 7 percent increase in weekly trips.
- Census blocks where 58 percent of service change area population live would receive at least a 70 percent increase in weekly trips.

Very few areas would receive reduced service as a result of the proposed C Line and Route 19 service changes; these include areas previously served by the Route 19H and 19Y branches, and near Osseo Road and 47th Avenue (Figure 4).

Replacing Route 19H and 19Y branches with limited Route 19 service to Thomas Avenue between 42nd Avenue and Lowry Avenue would reduce service for some west of Xerxes Avenue. The population living in these areas represents 3 percent of the total service change area population; they are 2 percent minority and 7 percent low-income, compared to 58 percent minority and 27 percent low-income within the entire service change area. Of the 75 to 85 average weekday boardings that occur in this area today, about 50 are within a quarter-mile of Penn Avenue. Thus, passengers representing about 30 average weekday boardings would be required to walk an additional quarter-mile to access transit service. The decision to replace Route 19H and 19Y branches was made following public feedback and public comment period, reviewing all responses, and weighing the benefits and impacts to both residents and riders.

The reduction in service around Osseo Road and 47th Avenue is the result of greater spacing between the Penn and 43rd and Brooklyn and 51st stations. A set of station platforms had been considered for the area around Osseo Road and Victory Memorial Parkway. However, as a result of input received from community members and policy makers, low transit demand, and an abundance of non-C Line transit service options in the area, a station in the area of Osseo Road and Victory Memorial Parkway was eliminated from consideration as part of the C Line station area planning efforts. Metro Transit will consider potential for adding a station in this segment as Osseo Road is reconstructed at a future time.

Figure 4. Service Level Change by Census Block



Source: U.S. Census Bureau 2010 Decennial Census; 2012-2016 American Community Survey 5-Year Estimates; Metropolitan Council.

Summary

Under the guidance of FTA Circular 4702.1B, federal funding recipients such as Metro Transit are required to conduct a Title VI Service Equity Analysis prior to the implementation of any service change that meets the transit agency's major service change threshold. This analysis reviewed the impacts of the proposed C Line and Route 19 service changes on minority and low-income populations. **This review finds that the recommended service changes will not result in disparate impacts to minority populations or disproportionate burdens to low-income populations.**

Since 2015, the C Line project has been the subject of over nine open houses and dozens of community events and presentations to neighborhood associations and the Metropolitan Council. The C Line is scheduled to open for revenue service in the spring of 2019, with Route 19 service changes implemented concurrently. Long term, a future realignment of the C Line to Glenwood Avenue would occur in coordination with light rail transit opening on Olson Highway and the completion of stations on Glenwood Avenue.

Title VI Service Equity Analysis

Route 614

April 2019

Metro Transit



SRF No. 12579

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Introduction

Title VI Service Equity Analysis

The Federal Transit Administration (FTA) requires recipients of federal funding, including Metro Transit, to conduct a Title VI Service Equity Analysis for any proposed service change that meets the agency's "major service change" threshold. This analysis fulfills this requirement as it relates to the proposed elimination of Route 614.

Proposed Elimination of Route 614

Route 614 (Figure 1) operates within the city of Minnetonka, between the Minnetonka Heights Apartments and the Ridgedale Center area via Highway 101, Minnetonka Boulevard, and Plymouth Boulevard. Weekday service is hourly between 5:15 a.m. and 7:00 p.m. Hourly Saturday service was eliminated in 2015 due to low ridership.

Following collaboration between Metro Transit and the City of Minnetonka, Route 614 was implemented in August 2013 to test the feasibility of community fixed route service in a Transit Market Area III and IV environment such as Minnetonka. Route 614 is operated by First Transit by contract to the Metropolitan Council. Minnetonka is an "opt-out" community with transit service provided by the Council under a Transit Cooperation Agreement.

For several years, Route 614 has performed well below regional route performance standards. The regional's minimum performance standard for a suburban local route, such as Route 614, is 10 passengers per in-service hour.¹ Since its implementation in 2013, Route 614 has consistency averaged below 5 passengers per in-service hour (Figure 2).² Marketing of Route 614 has included the distribution of "free ride" coupons as well as regular community outreach efforts.

As a result of these low performance metrics, Metro Transit and the Metropolitan Council are proposing Route 614 be eliminated. This change would meet the threshold for a major service change as defined in Metro Transit and the Metropolitan Council's Title VI Program Major Service Change Policy.³ The Metropolitan Council will hold a public hearing on April 15 to discuss the proposed elimination of Route 614. Following the public hearing and engagement

¹ Regional performance standards are outlined in Appendix G of the Metropolitan Council 2040 Transportation Policy Plan, available at: <https://metrocouncil.org/Transportation/Planning-2/Key-Transportation-Planning-Documents/Transportation-Policy-Plan/tpp-update/2018-TPP-Update-Appendices/Appendix-G-Regional-Transit-Design-Guidelines-and.aspx>.

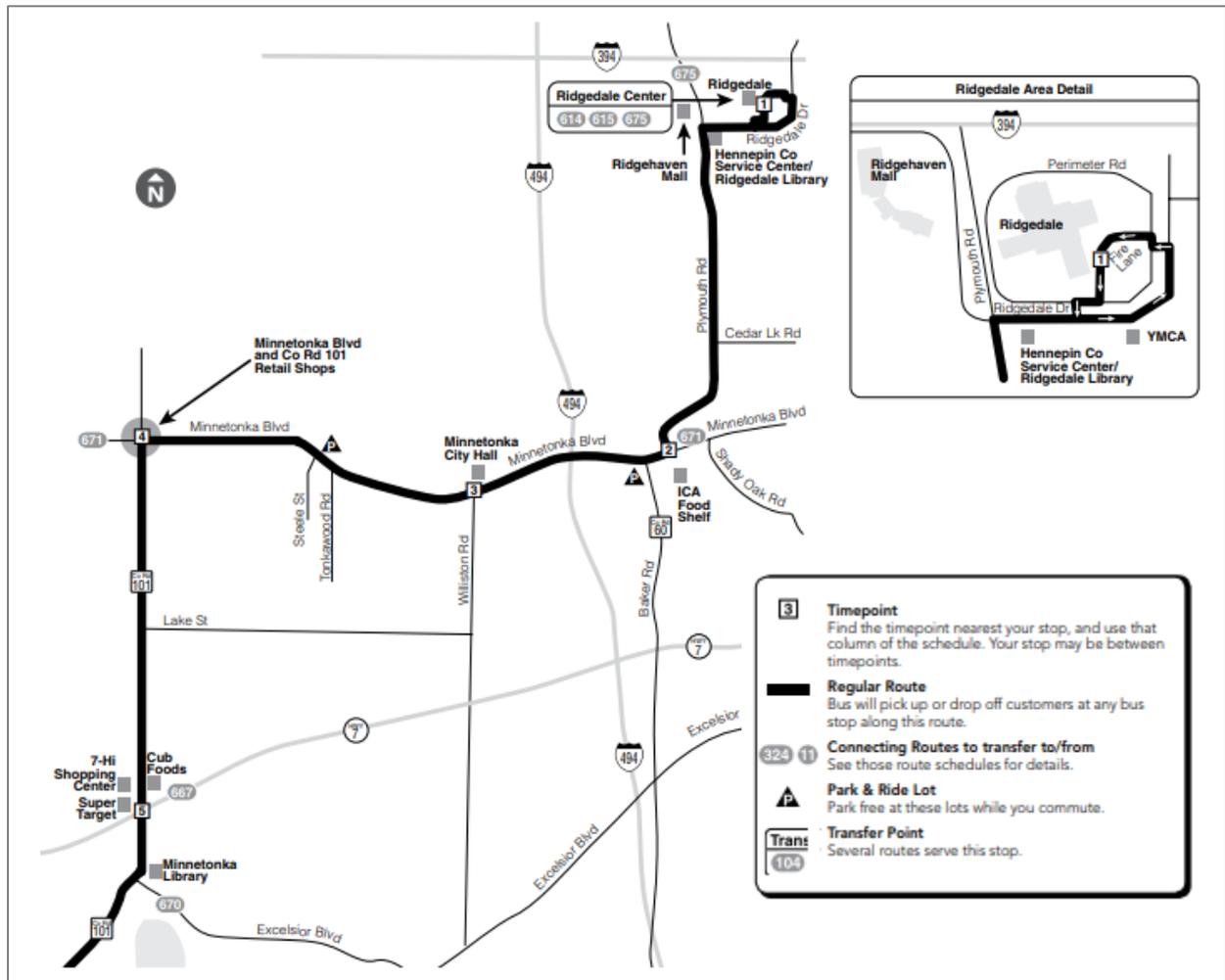
² In 2017, suburban local bus routes in the region averaged about 14 passengers per in-service hour on weekdays. Historical route performance is available in the Metropolitan Council's Regional Route Performance Analysis reports, available at: <https://metrocouncil.org/Transportation/Planning-2/Transit-Plans,-Studies-Reports/Transit-Transitways/RegionalRoutePerformanceAnalysis.aspx>.

³ <https://www.metrotransit.org/Data/Sites/1/media/pdfs/titlevi/TitleVIpolicyAfinal.pdf>

with stakeholders and the public, the Metropolitan Council Transportation Committee is expected in mid-May to make its decision regarding the proposed elimination of Route 614.

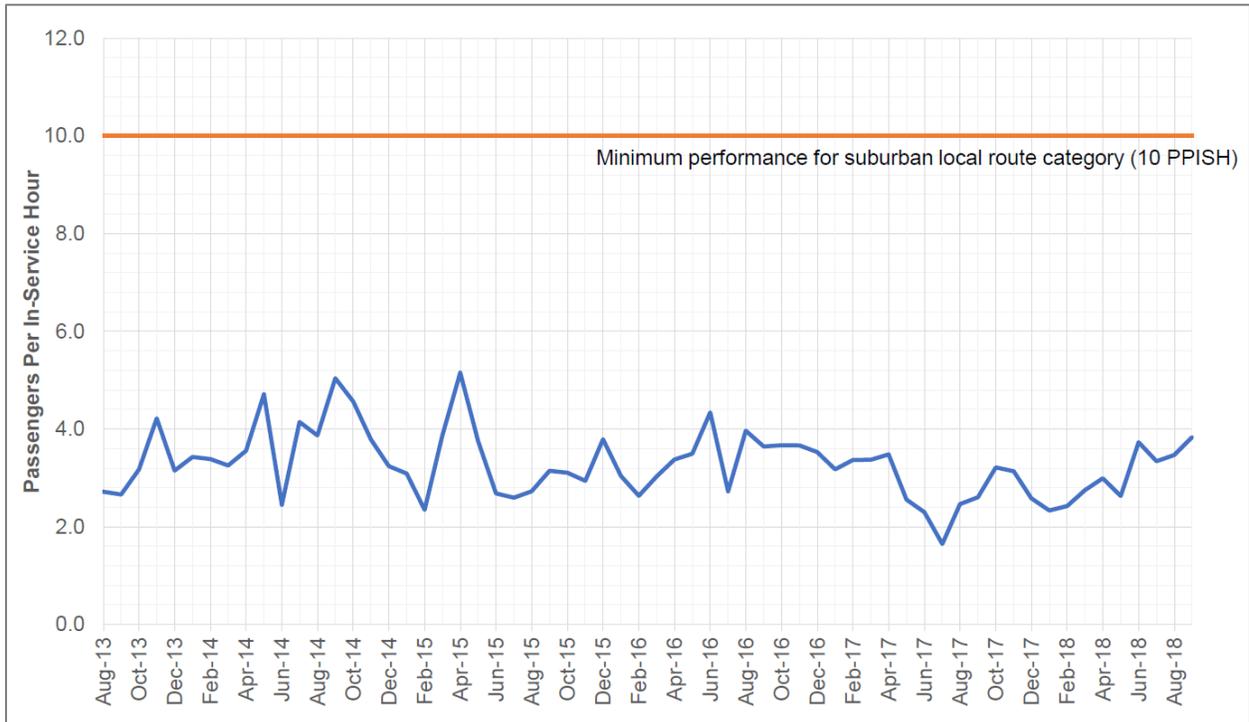
If Route 614 is eliminated, current riders' public transit options would be limited to Transit Link, the shared-ride demand response service provided by the Council. Transit Link is available to the general public weekdays from 6:00 a.m. to 7:00 p.m.

Figure 1. Route 614 Map



Map not to scale

Figure 2. Route 614 Passengers Per In-Service Hour (PPISH): Quarterly, 2013-2018



Service Change Area

This Title VI service equity analysis for Route 614 measures the location and magnitude of proposed service changes within a defined service change area. In this analysis, the Route 614 service change area is defined as within a quarter-mile of all existing bus stops served by Route 614.

Title VI Principles and Definitions

Title VI and Environmental Justice

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance. Title VI 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.”⁴

In 1994, President Clinton issued Executive Order 12898, which states that each federal agency “shall make achieving environmental justice part of its mission by identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.” Through this Executive Order, Title VI was identified as one of several Federal laws that should be applied “to prevent minority communities and low-income communities from being subject to disproportionately high and adverse environmental effects.”⁵

To provide direction to recipients of federal funding, the FTA issued Circular 4702.1B, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*, in 2012, which replaced Circular 4702.1A issued in 2007.⁶ FTA Circular 4702.1B outlines Title VI evaluation procedures for recipients of FTA-administered transit program funds and includes guidance for a variety of equity evaluations. This Title VI Service Equity Analysis for Route 614 satisfies the FTA requirement to evaluate service changes that meet an agency’s major service change threshold.

Title VI Definitions of Minority and Low-Income Populations

A note on the language and terminology used in this report: Many of the terms used in this report such as “minority” and “low-income” may not be consistent with efforts by Metro Transit and the Metropolitan Council to use respectful and inclusive language. However, these terms are used in this report to match the terminology used in the FTA Title VI Circular 4702.1B and other federal guidance.

⁴ <https://www.govinfo.gov/content/pkg/USCODE-2010-title42/pdf/USCODE-2010-title42-chap21-subchapV.pdf>

⁵ <https://www.archives.gov/files/federal-register/executive-orders/pdf/12898.pdf>

⁶ https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf

Minority

The FTA defines a minority person as one who self-identifies as American Indian/Alaska Native, Asian, Black or African American, Hispanic or Latino, and/or Native Hawaiian/Pacific Islander. For the purposes of this evaluation, non-minority persons were defined as those who self-identify as white and not Hispanic or Latino. All other persons, including those identifying as two or more races and/or ethnicities, were defined as minority persons. The distribution of minority and non-minority populations within the Route 614 service change area is shown in Figure 3. The Route 614 service change area is defined as within a quarter-mile of existing bus stops served by Route 614.

Low-Income

While low-income populations are not an explicitly protected class under Title VI, the FTA recognizes the inherent overlap between Title VI and Environmental Justice principles. Subsequently, it requires transit providers to evaluate the impact of service and fare changes to low-income populations and to identify any disproportionate burden placed on those populations by the proposed changes. The FTA defines a low-income person as one whose household income is at or below the poverty guidelines set by the Department of Health and Human Services (HHS). HHS poverty guidelines are based on household size and the number of related children less than 18 years of age.

However, FTA Circular 4702.1B also allows for low-income populations to be defined using other established measures that are at least as inclusive as those developed by HHS. Correspondingly, this Route 614 Title VI Service Equity Analysis used 2017 U.S. Census Bureau poverty thresholds, a more sophisticated measure of poverty that considers not only family size and the number of related children present, but also, for one- and two-person family units, whether one is elderly or not. The U.S. Census Bureau's poverty thresholds are used for statistical purposes, while HHS's poverty guidelines are used for administrative purposes.⁷ The U.S. Census Bureau 2017 poverty thresholds by family size and presence of related children under 18 years is shown in Table 1.

The distribution of low-income and non-low-income populations within the service change area is shown in Figure 4, based on 2017 U.S. Census Bureau poverty thresholds.⁸

⁷ The distinctions between poverty thresholds and guidelines are described further at: <https://aspe.hhs.gov/frequently-asked-questions-related-poverty-guidelines-and-poverty>.

⁸ The 2017 poverty thresholds were used to match the use of U.S. Census Bureau 2013-2017 American Community Survey 5-year estimates, the most up-to-date data available at the time of analysis.

Table 1. U.S. Census Bureau Poverty Thresholds (in Dollars), 2017

Size of Family Unit	Weighted Average Poverty Thresholds (\$)	Poverty Threshold (\$) by Number of Related Children Under 18 Years of Age								
		None	One	Two	Three	Four	Five	Six	Seven	Eight or more
One Person (Unrelated Individual)	12,488									
Under 65 Years	12,752	12,752								
65 Years & Over	11,756	11,756								
Two People	15,877									
Householder Under 65 Years	16,493	16,414	16,895							
Householder 65 Years & Over	14,828	14,816	16,831							
Three People	19,515	19,173	19,730	19,749						
Four People	25,094	25,283	25,696	24,858	24,944					
Five People	29,714	30,490	30,933	29,986	29,253	28,805				
Six People	33,618	35,069	35,208	34,482	33,787	32,753	32,140			
Seven People	38,173	40,351	40,603	39,734	39,129	38,001	36,685	35,242		
Eight People	42,684	45,129	45,528	44,708	43,990	42,971	41,678	40,332	39,990	
Nine People or More	50,681	54,287	54,550	53,825	53,216	52,216	50,840	49,595	49,287	47,389

Source: <https://www.census.gov/data/tables/time-series/demo/income-poverty/historical-poverty-thresholds.html>

Figure 3. Distribution of Minority and Non-Minority Populations

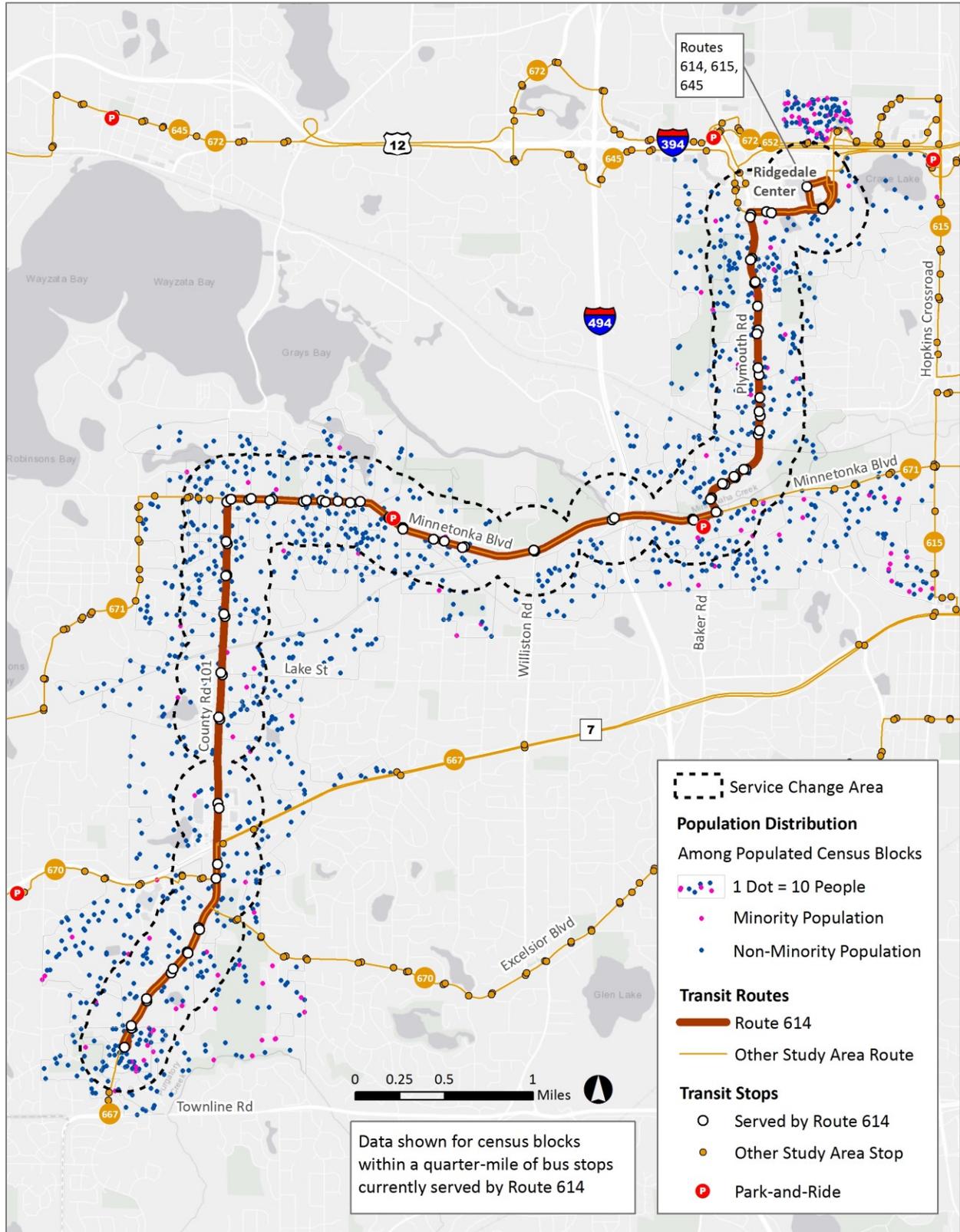
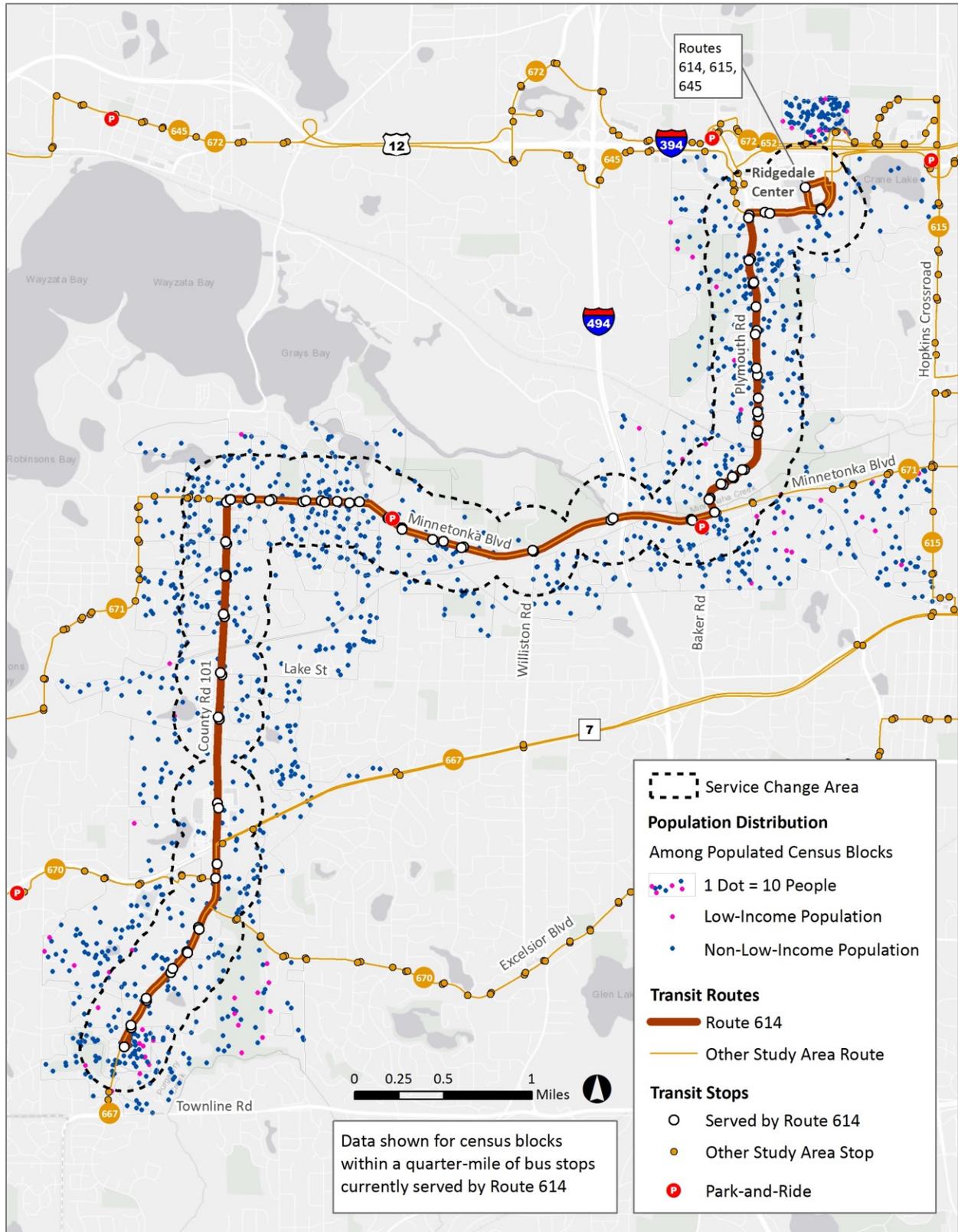


Figure 4. Distribution of Low-Income and Non-Low-Income Populations



Source: U.S. Census Bureau 2010 Decennial Census; 2013-2017 American Community Survey 5-Year Estimates; Metropolitan Council.

Disparate Impact, Disproportionate Burden, and the Four-Fifths Threshold

The FTA defines “disparate impacts” as facially neutral policies or practices that disproportionately affect members of a group identified by race, color, or national origin, and the recipient’s policy or practice lacks a substantial legitimate justification. If the results of the analysis indicate a potential for disparate impacts, further investigation is required. Metro Transit has defined its disparate impact threshold using the “four-fifths rule.” The four-fifths rule states that there may be evidence of disparate impacts if:

- Benefits are being provided to *minority* populations at a rate less than 80 percent (four-fifths) of the benefits being provided to non-minority populations, or
- Adverse effects are being borne by *non-minority* populations at a rate less than 80 percent (four-fifths) of the adverse effects being borne by minority populations.

The four-fifths rule originates from employment law but is applied in this setting to compare the distribution of benefits and/or adverse impacts among various population groups. The four-fifths rule suggests that a selection rate for any racial, ethnic, or gender group that is less than four-fifths or 80 percent of the rate for the group with the highest selection rate will be regarded as evidence of adverse impact. Although it is a general principle and not a legal definition, it is a practical way for identifying adverse impacts that require mitigation or avoidance. Metro Transit’s decision to use the four-fifths rule was subject to a formal public outreach process before being adopted by the Metropolitan Council in 2013.

Metro Transit uses a similar approach when comparing the distribution of benefits and adverse impacts for low-income and non-low-income populations. However, when the distributions for low-income populations fall outside of the four-fifths threshold, this is referred to as a disproportionate burden rather than a disparate impact.

Policies Applied to the Route 614 Service Changes

In this analysis, if the quantitative results indicate that the reduction in service levels borne by *non-minority/non-low-income* populations is less than 80 percent of the reduction in service levels borne by minority/low-income populations, this could be evidence of disparate impacts/disproportionate burdens. In this event, additional analysis will be conducted, and potential mitigation measures will be identified if necessary.

A service change that results in a disparate impact may only be implemented if:

- There is a substantial legitimate justification for the proposed service change, and
- There are no alternatives that would have a less disparate impact while still accomplishing the transit provider’s legitimate program goals.

Service Equity Analysis Methodology

A geographic information systems (GIS)-based approach was used in this analysis to measure the location and magnitude of proposed service changes and compare the distribution of impacts and benefits to minority, non-minority, low-income, and non-low-income populations. The analysis consists of five steps:

1. Model current and proposed service levels.
2. Spatially allocate current and proposed transit service levels to population groups based on intersection between service buffer and census block.
3. Calculate the percent change in service between the current and proposed service levels for each census block.
4. Calculate the average percent change in service for all minority/low-income and non-minority/non-low-income populations within the service change area for the current and proposed transit service.
5. Determine whether the proposed service will result in disparate impacts or disproportionate burdens by applying the disparate impact and disproportionate burden policies.

This analysis used the number of trips available to each census block as a measure of overall transit service levels. Common improvements to transit service, such as increased frequency and increased span of service, will result in an increase in the number of trips available. The addition of service to a new area will also result in an increase in the number of trips available to the surrounding areas. Total weekly scheduled trips were used in this analysis, accounting for Saturday and Sunday service levels, in addition to those on weekdays.

Modeling Current and Proposed Service Levels

Two networks were modeled to represent the current service levels and the proposed service levels. This analysis considered all fixed-route public transit service (from any route) to bus stops within the service change area. Assigning transit service to bus stops assigns service only to areas near where a bus may actually pick up and drop off passengers.

The number of weekly scheduled transit trips at each bus stop were allocated to census blocks as a means of quantifying the amount of transit service available in a given area. A census block was considered served by a bus stop if any part of the census block was within a quarter-mile of

the bus stop.⁹ The quarter-mile distance is the standard maximum walking distance assumed for access local bus service.

The current service level network represents the conditions as of March 2019, disregarding any current or anticipated short-term detours. Existing bus stops within the service change area are served by Metro Transit suburban local routes 614 and 615, and express routes 645, 652, 667, 670, 671, and 672.

The proposed service level network assumes the same conditions as the current service level network, but with the elimination of all service provided by Route 614.

Demographic Data

To understand the Title VI implications of a major service change, level of transit service is reviewed in context of the demographics of the areas served. As discussed above, level of transit service in this analysis is measured by the number of weekly scheduled trips available to populations living in census blocks.

Demographic information is available at the census block level from the 2010 U.S. Census Bureau Decennial Census. However, the most recent demographic dataset published by the U.S. Census Bureau, the 2013-2017 American Community Survey (ACS) 5-year Estimates, is available only at the census block group level. The 2013-2017 ACS dataset contains estimates that are based on the most recent five years of data collected by the U.S. Census Bureau (2013 through 2017).¹⁰

Census block groups and blocks differ in their geographic makeup. Census blocks are the smallest geographic unit used by the U.S. Census Bureau and are bounded by roadways or water features in urban areas. A census block group is typically made up of a cluster of approximately 40 blocks. Due to their size, it can be difficult to identify location-specific impacts using only block group data.

To provide more granularity and detail to the analysis, minority and low-income populations were estimated at the census block level using a combination of 2013-2017 ACS data and 2010 Decennial Census data. The 2013-2017 ACS populations for each block group were allocated to their corresponding blocks using the proportion of total population for that block relative to its parent block group according to the 2010 Decennial Census. For example, if the 2010 data showed that a block contained 10 percent of the total population within its parent block group, it was assumed that in present day this block contains 10 percent of the minority and low-

⁹ This “simple intersect” census block selection method – wherein a census block is considered served by the bus stop if any part of the block is within a quarter-mile from the bus stop – differs from the standard method used by Metro Transit in its service equity analyses. Typically, the centroid of a census block must be within a quarter-mile of the bus stop in order to be considered served. However, the more inclusive method was selected for this analysis to gather sufficient data along the length of the service change corridor.

¹⁰ As a collection of estimates, the 2013-2017 ACS data are subject to error, but remain the most reliable and current demographic data readily available for the service area.

income populations estimated in the 2013-2017 ACS data. While this approach assumes that the percentage of minority and low-income populations are uniformly distributed throughout the block group, it allows for a more precise analysis than using the block groups as a whole. This approach also allows for the identification of zero-population areas within each block group and is consistent with the methodology used in previous Metro Transit Title VI evaluations.

Calculating Change in Service Level by Census Block

The absolute change in service level was calculated for each census block in the service change area by subtracting the current number of weekly scheduled trips available from the proposed number of weekly scheduled trips available. Two networks were modeled to represent the current service levels and the proposed service levels.

- **Current:** weekly scheduled trips serving the service change area as of March 2019
- **Proposed:** weekly scheduled trips serving the service change area as of March 2019, with the removal of service from Route 614

This analysis considered service from all existing fixed routes serving the service change area, including Metro Transit suburban local routes 614 and 615, and express routes 645, 652, 667, 670, 671, and 672.

After the absolute change between the proposed and current service networks was calculated, the percent change in service was calculated by dividing the change in weekly scheduled trips by the existing number of weekly scheduled trips. To minimize artificial skewing, all percent changes greater than 100 percent (positive or negative), including those that are incalculable due to no proposed service, were adjusted to a maximum absolute value of 100 percent.

Determining Average Percent Change in Service

The average percent change in service for each target population was calculated by weighting the percent change in each census block by the target population served in that census block. For example, the average percent change in service for minority populations was completed by multiplying each census block's minority population by the percent change in service for that block, summing the results for the blocks in the service change area, and dividing that sum by the total minority population for the blocks in the service change area. The formula used for these analyses is shown below.

$$Avg \% \Delta = \frac{\sum (Population_i \times Percent\ Change_i)}{\sum Population_i}$$

Where:

Population_i = Target population of census block *i*.

Percent Change_i = Percent change in service levels for census block *i*.

In this manner, the weighted percent change was calculated individually for the total population, minority population, non-minority population, low-income population, and non-low-income population. Using this method, the impacts of the service changes for each census block are proportionate to both the demographics of the census blocks and the degree of service level change.

Evaluation of Impacts

Average Service Level Change by Population Group

The service level impacts to Title VI populations resulting from the proposed elimination of Route 614 are assessed by calculating a comparison index between the minority and non-minority results, and between the low-income and non-low-income results. The comparison index is measured as the ratio between the non-minority/non-low-income results and the minority/low-income results. A comparison index less than 0.80 (four-fifths) indicates the potential for disparate impact. However, as described in greater detail below, minority and low-income persons are expected to experience service reductions comparable in size to those experienced by non-minority and non-low-income persons.

In total, 13,594 people live in census blocks within the Route 614 service change area. This population includes 1,455 minority persons, 12,140 non-minority persons, 779 low-income persons, and 12,777 non-low-income persons (Table 2).¹¹ The average percent change in service levels for each target population group is summarized in Table 2.

Table 2. Average Service Level Change by Population Group

Population Group	Population of Service Change Area	Average Percent Service Change
Minority	1,455	-61.5%
Non-Minority	12,140	-73.6%
Comparison Index		1.20
Low-Income	779	-67.6%
Non-Low-Income	12,777	-72.5%
Comparison Index		1.07
Total	13,594	-72.3%

Overall, the proposed service changes result in a dramatic relative decrease in transit service availability for all population groups within the service change area. The average individual in the service change area – regardless of race, ethnicity, or low-income status, is expected to experience a 72.3 percent decrease in transit service, as measured by number weekly scheduled trips (Table 2).

¹¹ It should be noted that the ACS cannot determine low-income status for persons residing in group quarters. This includes, but is not limited to, populations living in dormitories, group homes, nursing facilities, and correctional facilities. For this reason, the combined total of low-income and non-low-income populations is 13,556, slightly less than that estimated population as a whole.

The average minority individual in the service change area would experience a 61.5 percent decrease in transit service (Table 2). This decrease is less than the average decrease of 73.6 percent for non-minority individuals. **Therefore, this analysis identifies no potential for disparate impacts to minority populations as a result of the proposed service changes.**

The average low-income individual in the service change area would experience a 67.6 percent decrease in transit service. This decrease is less than the average decrease of 72.5 percent for non-low-income individuals (Table 2). **Therefore, this analysis identifies no potential for disproportionate burdens to low-income populations as a result of the proposed service changes.**

Service Level Change by Census Block

The percent change in service level, as measured by weekly scheduled trips by census block, is shown in Figure 5. Areas with zero population are excluded from the figure. All census blocks within the service change area would receive a decrease in service.

Service reductions are greatest in areas where the only current fixed-route transit service is from Route 614; this includes along much of Plymouth Road between Ridgedale Center and Minnetonka Boulevard, and along much of County Road 101 between Minnetonka Boulevard and MN-7 (Figure 5). Decrease in service is relatively less in areas served by other routes; this includes areas immediately surrounding Ridgedale Center and around the intersections of County Road 101 and MN-7, and County Road 101 and Excelsior Boulevard.

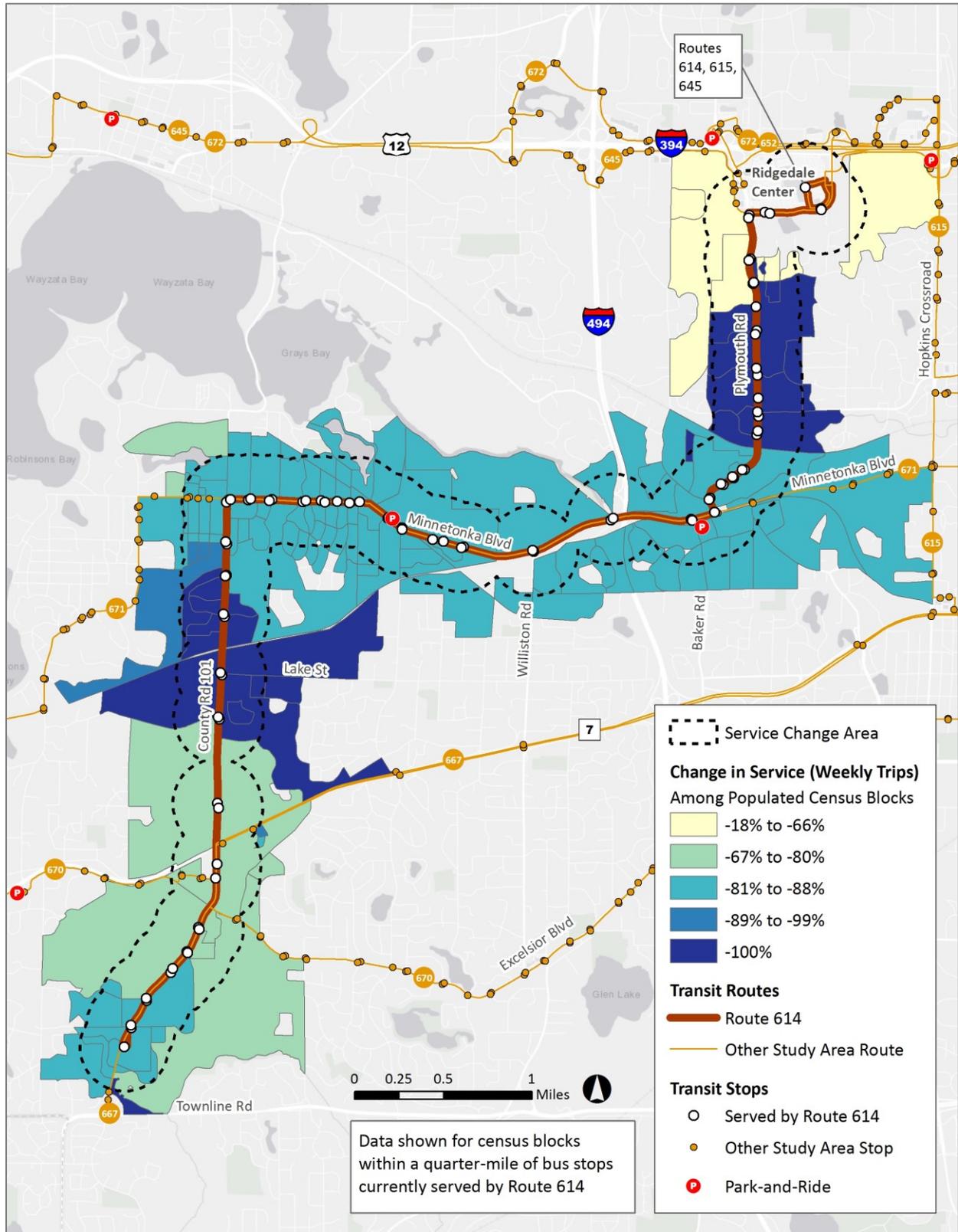
If the elimination of Route 614 is approved, current users' remaining public transit alternative for local (non-express) service would be Transit Link, the Metropolitan Council's demand response service open to the general public without eligibility requirements.

Impact on the Metro Mobility ADA Service Area

Route 614 is subject to requirements under the Americans with Disabilities Act (ADA), which state that comparable paratransit service must be provided within $\frac{3}{4}$ -mile of any all-day regular-route service. Metro Mobility, the Metropolitan Council's complementary paratransit service, operates within this federally-mandated $\frac{3}{4}$ -mile ADA Service Area, but also within an extended service area defined by the regional Transit Taxing District (known as the Metro Mobility Service Area).¹² The elimination of Route 614 will not change the Metro Mobility Service Area; however, it will reduce the size of the weekday federally-mandated ADA service area. This change will reduce the area where Metro Mobility reserved trips are guaranteed (under ADA) and, conversely, increase the area where reserved trips can be placed on standby.

¹² The federally-mandated ADA Service Area and larger Metro Mobility Service Area are described in greater detail at: <https://metrocouncil.org/Transportation/Services/Metro-Mobility-Home/Trip-Providers-Areas-Hours.aspx#ServiceAreaLookupForm>.

Figure 5. Service Level Change by Census Block



Source: U.S. Census Bureau 2010 Decennial Census; 2013-2017 American Community Survey 5-Year Estimates; Metropolitan Council.

Summary

Under the guidance of FTA Circular 4702.1B, federal funding recipients such as Metro Transit are required to conduct a Title VI Service Equity Analysis prior to the implementation of any service change that meets the transit agency's major service change threshold. This analysis reviewed the impacts of the proposed elimination of Route 614 on minority and low-income populations. **This review finds that the recommended service changes will not result in disparate impacts to minority populations or disproportionate burdens to low-income populations.**

For several years, Route 614 has performed well below regional route performance standards, despite sustained marketing efforts. The Metropolitan Council will hold a public hearing on April 15 to discuss the proposed elimination of Route 614. Following the public hearing and engagement with stakeholders and the public, the Metropolitan Council is expected in mid-May to make its decision regarding the proposed elimination of Route 614.

**ATTACHMENT H: APPROVED SERVICE
MONITORING EVALUATION**

Council Chair Alene Tchourumoff

Council Members

Katie Rodriguez	Jennifer Munt	Gary Cunningham	Edward Reynoso	Sandy Rummel	Richard Kramer	Steven Chávez
Lona Schreiber	Steve Elkins	Cara Letofsky	Marie McCarthy	Harry Melander	Jon Commers	Wendy Wulff
Deb Barber	Gail Dorfman					

Meeting Minutes

Wednesday, October 24, 2018 4:00PM Council Chambers

IN ATTENDANCE

Rodriguez, Schreiber, Munt, Barber, Elkins, Dorfman, Cunningham, Reynoso, McCarthy, Rummel, Melander, Kramer, Chávez, Wulff, Tchourumoff

CALL TO ORDER

A quorum being present, Chair Tchourumoff called the meeting to order at 4:02PM.

APPROVAL OF AGENDA AND MINUTES

It was moved by Reynoso, seconded by McCarthy.

It was moved by Rummel, seconded by Munt.

BUSINESS

Joint Report of the Management, Community Development, Environment, and Transportation Committees

2018-237 Authorize the amendment of the 2018 Unified Budget as indicated in accordance with the attached tables.

It was moved by Chávez, seconded by Kramer.

Motion carried on the following roll call vote:

Aye: 15 Rodriguez, Schreiber, Munt, Barber, Elkins, Dorfman, Cunningham, Reynoso, McCarthy, Rummel, Melander, Kramer, Chávez, Wulff, Tchourumoff

Nay: 0

Absent: 2 Letofsky, Commers

CONSENT AGENDA

Approval of the Consent Agenda (Items 1-9)

Consent Agenda Adopted

1. 2018-229 Authorize the Regional Administrator to negotiate and award a contract with VTI Security in an amount not to exceed \$800,000 for a contract period up to 5 years to provide equipment, installation, migration, and support services for an enterprise building card access system.
2. 2018-236 Approve the results of the 2018 Title VI Service and Facilities Monitoring Study.

3. 2018-255 Adopt the amended Real Estate Policy to guide real estate acquisitions and dispositions across the organization to support the Council’s mission.
4. 2018-260 Authorize the Regional Administrator to negotiate and execute contract 18P309 with Metropolitan Transportation Network, Inc. to provide regular route local and limited stop transit service from December 1, 2018 through July 31, 2020, in an amount not to exceed \$4,071,725.
5. 2018-261 Accept the recommendation of the Metropolitan Parks and Open Space Commission to convey the attached list of proposed projects to the Governor’s office for inclusion in the Parks and Trails Legacy Fund appropriation for the state fiscal 2020/2021 biennium.
6. 2018-269 Authorize the Regional Administrator to negotiate and award a contract with Insight in an amount not to exceed \$900,000 to provide CISCO parts, service and professional services necessary to segment the Metro Transit Police Department computers and network from the other areas of the Council network.
7. 2018-271 Authorize the Regional Administrator to apply for calendar 2019 grants from the counties of Anoka, Dakota, Hennepin, Ramsey, and Washington.
8. 2018-275 Pass Resolution 2018-20 authorizing the Regional Administrator to negotiate with EN Properties, LLC for the acquisition of fee title in Lake Elmo, MN and authorize Council legal staff to initiate condemnation proceedings if the parcel cannot be acquired by direct negotiation.
9. 2018-278 Approve the Metropolitan Area Enhanced Mobility for Seniors and individuals with Disabilities (FTA 5310) grant awards for 2019.

BUSINESS

Community Development

2018-274 Award four Livable Communities Demonstration Account Transit Oriented Development grants as follows, totaling \$4,499,250, and authorize its Community Development Division Director to execute the grant agreements on behalf of the Council:

Recommended Projects	Applicant	Points	LCDA-TOD Funding
Northwest University & Dale	Saint Paul	89.87	\$949,250
Lake Street Apartments	Minneapolis	88.50	\$1,200,000
The Peris	Minneapolis	77.90	\$350,000
The Legends of Minnetonka	Minnetonka	77.13	\$2,000,000
Total Recommended			\$4,499,250
Total Available			\$6,750,000
Total Remaining			\$2,250,750

It was moved by Kramer, seconded by Munt.

Motion carried.

2018-276 Adopt the attached Advisory Comments and Review Record and take the following actions: Recommendations of the Community Development Committee: 1. Authorize Grey Cloud Island Township to place its 2040 Comprehensive Plan into effect. 2. Advise the Township to: A. Adopt the

Mississippi River Corridor Critical Area component of their 2040 Comprehensive Plan within 60 days after receiving final approval from the Minnesota Department of Natural Resources (DNR); and submit a copy of the final adopted plan and evidence of adoption to the DNR, Council, and National Park Service within ten days after the adoption. B. Forward a final copy of the Local Water Management Plan (LWMP) to the Council after South Washington Watershed District (SWWD) approves the LWMP and the Township adopts its LWMP, along with the SWWD approval date, and local adoption date of the final plan. 3. Advise the Township to implement the advisory comments in the Review Record for Forecasts and Housing.

It was moved by Kramer, seconded by Melander.

Motion carried.

Environment

2018-291 SW Authorize the Regional Administrator to award and execute a contract for 1-MN-310 4th Street Access Shafts and Tunnel Repair Project 807665, Contract 18P259, to PCI Roads for their low, responsive, responsible bid of \$3,929,674.00.

It was moved by Rummel, seconded by Cunningham.

Motion carried.

Management

2018-264 Adopt the Equity Policy.

Lesley Kandaras gave a brief presentation on the item.

It was moved by Reynoso, seconded by Munt.

Motion carried.

2018-266 Adopt the 25 indicators as shown in Table 1 as the Thrive Indicators.

It was moved by Chávez, seconded by Cunningham.

Motion carried.

Transportation

2018-263 Authorize the Regional Administrator to execute purchase agreements, contingent upon approval of Business Item 2018-237 JT, with: 1. North Central Bus Sales (MnDOT Contract 121155) for up to 53 replacement buses and 7 expansion buses in an amount not to exceed \$4,234,200; and 2. Hogle Bus (MnDOT Contract 121183) for up to 26 replacement buses and 14 expansion buses in an amount not to exceed \$2,839,500.

It was moved by Rodriguez, seconded by Rummel.

Motion carried.

2018-267 Accept the attached Public Comment Report on the draft update to the *2040 Transportation Policy Plan* and adopt the revised final update of the *2040 Transportation Policy Plan*.

It was moved by Rodriguez, seconded by Elkins.

Chair Tchourumoff thanked staff and members of the public who submitted comments.

Motion carried.

2018-272 Authorize the Regional Administrator to negotiate and execute the Memorandum of Understanding (MOU) regarding Bus Electrification Strategy (18M122A), the Metro Transit Electric Buses and Charging Infrastructure Agreement (18M122B) between the Metropolitan Council and Xcel Energy (dba Northern States Power Company), and any necessary future similar Charging Infrastructure Agreements to provide power at additional locations or for additional electric buses.

It was moved by Rodriguez, seconded by Schreiber.

Motion carried.

OTHER BUSINESS

2018-280 Adopt the Public Comment Draft of the 2019 Unified Budget.

It was moved by Cunningham, seconded by Reynoso.

Motion carried.

REPORTS

Council Members:

Munt—Attended Rail~Volution in Pittsburgh.

Chair: Attended the Metro Mobility workshop.

Regional Administrator: None.

General Counsel: None.

The meeting was adjourned at 4:36PM.

Certification

I hereby certify that the foregoing narrative and exhibits constitute a true and accurate record of the Metropolitan Council Meeting of October 24, 2018.

Approved this 15th day of November 2018.

Emily Getty
Recording Secretary

2018 Service and Facilities Standards Monitoring

In Compliance with FTA Circular 4702.1B

Metro Transit



October 2018

SRF No. 11413

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Executive Summary

In order to comply with Federal Transit Administration (FTA) Title VI guidelines, federal funding recipients are required to adopt quantitative system standards necessary to guard against discriminatory service design and operations decisions. The FTA requires transit systems to monitor service standards at least once every three years by comparing the level and quality of service between minority routes and non-minority routes and between low-income routes and non-low-income routes to ensure that the current distribution of service does not result in discrimination against minority and/or low-income populations.

A note on the language and terminology used in this report: Many of the terms used in this report such as “minority” and “low-income” may not be consistent with efforts by Metro Transit and the Metropolitan Council to use respectful and inclusive language. However, these terms are used in this report to match the terminology used in the FTA Title VI Circular and other federal guidance.

Technical Analysis of Service Standards and Policies

This analysis reviewed the distribution and quality of service for each of the standards and policies listed below. Metro Transit’s established service standards and policies are described primarily in the Council’s *2040 Transportation Policy Plan (TPP), Appendix G: Regional Transit Design Guidelines and Performance Standards*, and other guidance such as newly developed shelter placement and vehicle load guidelines.

- Vehicle Load
- Vehicle Headway
- On-Time Performance
- Service Availability
 - Route Spacing
 - Midday Headway
 - Bus Stop Spacing
- Transit Amenities
 - Bus Shelter Distribution
 - Customer Information
 - Transit Facility Amenities
- Vehicle Assignment

The analysis was completed for bus (local, express, and BRT), light rail, and commuter rail (Northstar) modes independently. The results for light rail and Northstar are shown primarily for informational purposes. Metro Transit has only one commuter rail route and both of the light rail lines (Blue Line and Green Line) are identified as minority and low-income routes. It is therefore impossible to make comparisons between these route designations as it is with the bus system.

Disparate Impact, Disproportionate Burden, and the Four-Fifths Threshold

The FTA defines “disparate impacts” as facially neutral policies or practices that disproportionately affect members of a group identified by race, color, or national origin, where the recipient’s policy or practice lacks a substantial legitimate justification. Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance. Title VI 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.” President Clinton’s Executive Order 12898 extends similar protections to low-income persons.

If the results of this evaluation indicate a potential for disparate impacts, further investigation is required. Metro Transit has defined its disparate impact threshold using the “four-fifths rule.” The four-fifths rule states that there may be evidence of disparate impacts if:

- Benefits are being provided to minority populations at a rate less than 80 percent (four-fifths) of the benefits being provided to non-minority populations, or
- Adverse effects are being borne by non-minority populations at a rate less than 80 percent (four-fifths) of the adverse effects being borne by minority populations.

The four-fifths rule originates from employment law but is applied in this setting to compare the distribution of benefits and/or adverse impacts among various population groups. The four-fifths rule suggests that a selection rate for any racial, ethnic, or gender group that is less than four-fifths or 80 percent of the rate for the group with the highest selection rate will be regarded as evidence of adverse impact. Although it is a “rule of thumb” and not a legal definition, it is a practical way for identifying adverse impacts that require mitigation or avoidance. Metro Transit’s decision to use the four-fifths rule was subject to a formal public outreach process before being adopted by the Metropolitan Council in 2013.

Metro Transit uses a similar approach when comparing the distribution of benefits and adverse impacts for low-income and non-low-income populations. However, when the distributions for low-income populations fall outside of the four-fifths threshold, this is referred to as a disproportionate burden rather than a disparate impact.

In this analysis, if the quantitative results indicate that service standard compliance in predominantly minority/low-income areas is less than 80 percent of the compliance rate for non-minority/non-low-income areas, this could be evidence of disparate impacts or disproportionate burdens. In these cases, additional analysis will be conducted, and potential mitigation measures will be identified if necessary.

Summary of Results

A summary of the results of each evaluation is shown in Table 1. The potential for disparate impacts to minority populations and disproportionate burdens to low-income populations was identified in the Transit Amenities: Bus Shelter Amenities category. The specific amenity in question is the distribution of heaters at stops with shelters. Additional discussion of the potential causes of these results and the steps Metro Transit will undertake are discussed in detail in the Transit Amenities section.

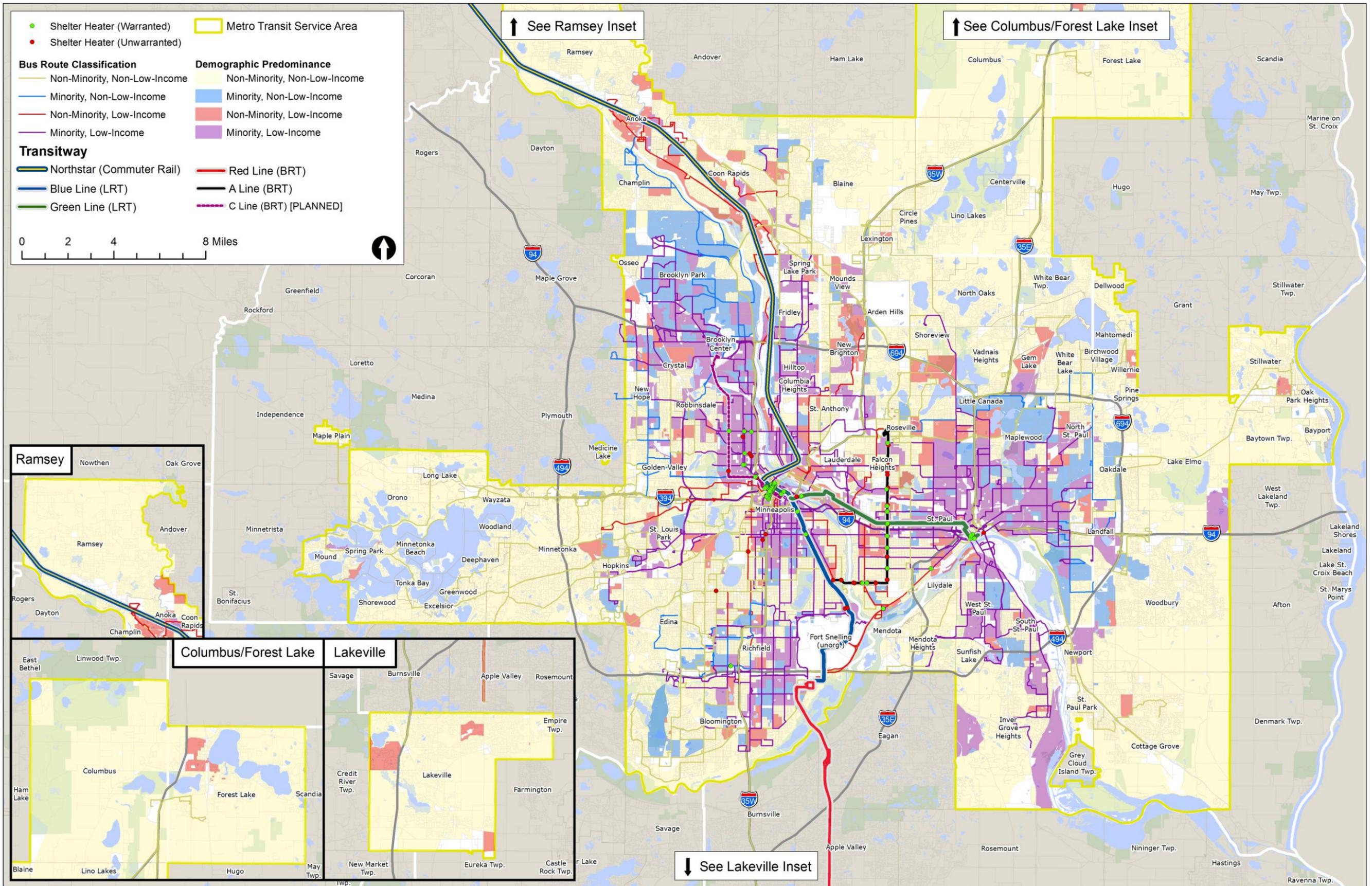
Table 1. Summary of Results

Standard/Policy	Minority Results	Low-Income Results
Vehicle Load	No Disparate Impacts	No Disproportionate Burdens
Vehicle Headway	No Disparate Impacts	No Disproportionate Burdens
On-Time Performance	No Disparate Impacts	No Disproportionate Burdens
Service Availability	-	-
Route Spacing	No Disparate Impacts	No Disproportionate Burdens
Midday Service Availability	No Disparate Impacts	No Disproportionate Burdens
Stop/Station Spacing	No Disparate Impacts	No Disproportionate Burdens
Transit Amenities	-	-
Bus Shelter Amenities*	Potential Disparate Impacts Identified	Potential Disproportionate Burdens Identified
Customer Information	No Disparate Impacts	No Disproportionate Burdens
Transit Facilities	No Disparate Impacts	No Disproportionate Burdens
Vehicle Assignment	No Disparate Impacts	No Disproportionate Burdens

* Amenities reviewed include shelter distribution and the availability of heat and light in shelters. The availability of heat at shelters was the only area showing potential impacts.

The purpose of this document is to satisfy Metro Transit’s requirement to monitor and evaluate compliance with FTA Title VI Requirements as they apply to the implementation of the agency’s service standards and policies. The review found that nearly all of Metro Transit’s standards and policies are implemented fairly and equitably with no potential for disparate impacts to minority populations or disproportionate burdens to low-income populations. As noted above, some minor issues were identified for individual standards or policies under the Bus Shelter Amenities category. Additional analysis of this result identified the implementation of heated shelters at A Line BRT and MARQ2 bus stops in downtown Minneapolis one of the main causes of the negative result. It is anticipated that the implementation of additional planned BRT lines in the near future will address these issues. These BRT lines represent a significant investment in transit infrastructure for the region and will be implemented in predominantly minority and/or low-income areas. The locations of transit routes by Title VI classification and the locations of bus shelter heaters are highlighted in Figure i. Metro Transit will continue to monitor the impact of heated shelters installed on these additional routes to ensure compliance with Title VI requirements.

Figure i. Transit Service and Area by Title VI Classification



Introduction

In order to comply with Federal Transit Administration (FTA) Title VI guidelines, federal funding recipients are required to adopt quantitative system standards necessary to guard against discriminatory service design and operations decisions. The FTA requires transit systems to monitor service standards at least once every three years by comparing the level and quality of service between minority routes and non-minority routes and between low-income routes and non-low-income routes to ensure that the current distribution of service does not result in discrimination against minority and/or low-income populations.

Note that many of the terms used in this report such as “minority” and “low-income” may not be consistent with efforts by Metro Transit and the Metropolitan Council to use respectful and inclusive language. However, these terms are used in this report to match the terminology used in the FTA Title VI Circular and other federal guidance.

The FTA requires agencies to adopt service standards and suggests the standards include (but are not limited to) vehicle assignment, vehicle load, vehicle headway, on-time performance, service availability, and distribution of transit amenities. This review uses these themes to compare existing transit services and amenities to Metro Transit’s established service standards and policies as outlined in the Metropolitan Council’s *2040 Transportation Policy Plan (TPP)*, *Appendix G: Regional Transit Design Guidelines and Performance Standards*, and other guidance such as the newly developed shelter placement and vehicle load guidelines.

For this analysis, the rates of compliance were compared between minority and non-minority routes/areas and between low-income and non-low-income routes/areas for the following Metro Transit standards and policies.

- Vehicle Load
- Vehicle Headway
- On-Time Performance
- Service Availability
 - Route Spacing
 - Midday Headway
 - Bus Stop Spacing
- Transit Amenities
 - Bus Shelter Distribution
 - Customer Information
 - Transit Facility Amenities
- Vehicle Assignment

This analysis included fixed routes directly operated by Metro Transit, those operated under contract to the Metropolitan Council, and the METRO Red Line Bus Rapid Transit. The Metro Transit Service Area used for this analysis was defined as the extents of the Transit Capital Levy Communities excluding those areas served by suburban transit authorities. Unless otherwise noted, the data used for this analysis is from the Fall 2017 pick.

Title VI and Environmental Justice

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance. Title VI 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.”

In 1994, President Clinton issued Executive Order 12898, which states that each federal agency “shall make achieving environmental justice part of its mission by identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.” Through this Executive Order, Title VI was identified as one of several Federal laws that should be applied “to prevent minority communities and low-income communities from being subject to disproportionately high and adverse environmental effects.”

To provide direction to recipients of federal funding, the FTA issued Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, in 2012. The Circular outlines the Title VI evaluation procedures for recipients of FTA-administered transit program funds and includes guidance for a variety of equity evaluations. This evaluation satisfies the FTA requirement to monitor transit service standards for public transportation agencies operating 50 or more vehicles in peak service and located in an urbanized area of 200,000 or more in population.

Defining Low-Income and Minority Populations

This review uses FTA definitions related to Title VI-protected populations and geographic areas. The FTA guidelines state recipients should evaluate services by comparing the service on predominantly minority/low-income routes with predominantly non-minority/non-low-income routes. The terms “predominantly minority” and “predominantly low-income” are further defined and described in this section.

Predominantly Minority Areas

The FTA defines a minority person as one who self-identifies as American Indian/Alaska Native, Asian, Black or African American, Hispanic or Latino, and/or Native Hawaiian/Pacific Islander. For the purposes of this evaluation, non-minority persons are defined as those who self-identify as White and non-Hispanic. The remaining population is defined as minority.

A predominantly minority area is defined as one where the proportion of minority persons exceeds the proportion of minority persons in the overall service area. Based on data from the 2010 U.S. Decennial Census and 2012-2016 American Community Survey (ACS) Five-Year Estimates, the percentage of minority persons in the Metro Transit service area is 29.7 percent. Of the 36,735 census blocks inside the service area, 8,227 are identified as predominantly minority using this definition. Predominantly minority areas in the Metro Transit service area are shown in Figure 1.

Predominantly Low-Income Areas

While low-income populations are not an explicitly protected class under Title VI, the FTA recognizes the inherent overlap between Title VI and Environmental Justice principles. Subsequently, it requires transit providers to evaluate the impact of service and fare changes to low-income populations and to identify any disproportionate burden placed on those populations by the proposed changes. The FTA defines a low-income person as one whose household income is at or below the poverty guidelines set by the Department of Health and Human Services (DHHS). DHHS poverty guidelines are based on household size and the number of related children less than 18 years of age.

However, FTA Circular 4702.1B also allows for low-income populations to be defined using other established thresholds that are at least as inclusive as those developed by DHHS. Correspondingly, this analysis uses 2016 U.S. Census Bureau poverty thresholds, a more sophisticated measure of poverty that takes into account not only family size and the number of related children present, but also, for one- and two-person units, whether elderly or not. The U.S. Census Bureau's poverty thresholds are used for statistical purposes, while DHHS's poverty guidelines are used for administrative purposes.¹ The U.S. Census Bureau 2016 poverty thresholds by family size and presence of related children under 18 years is shown in Table 2.

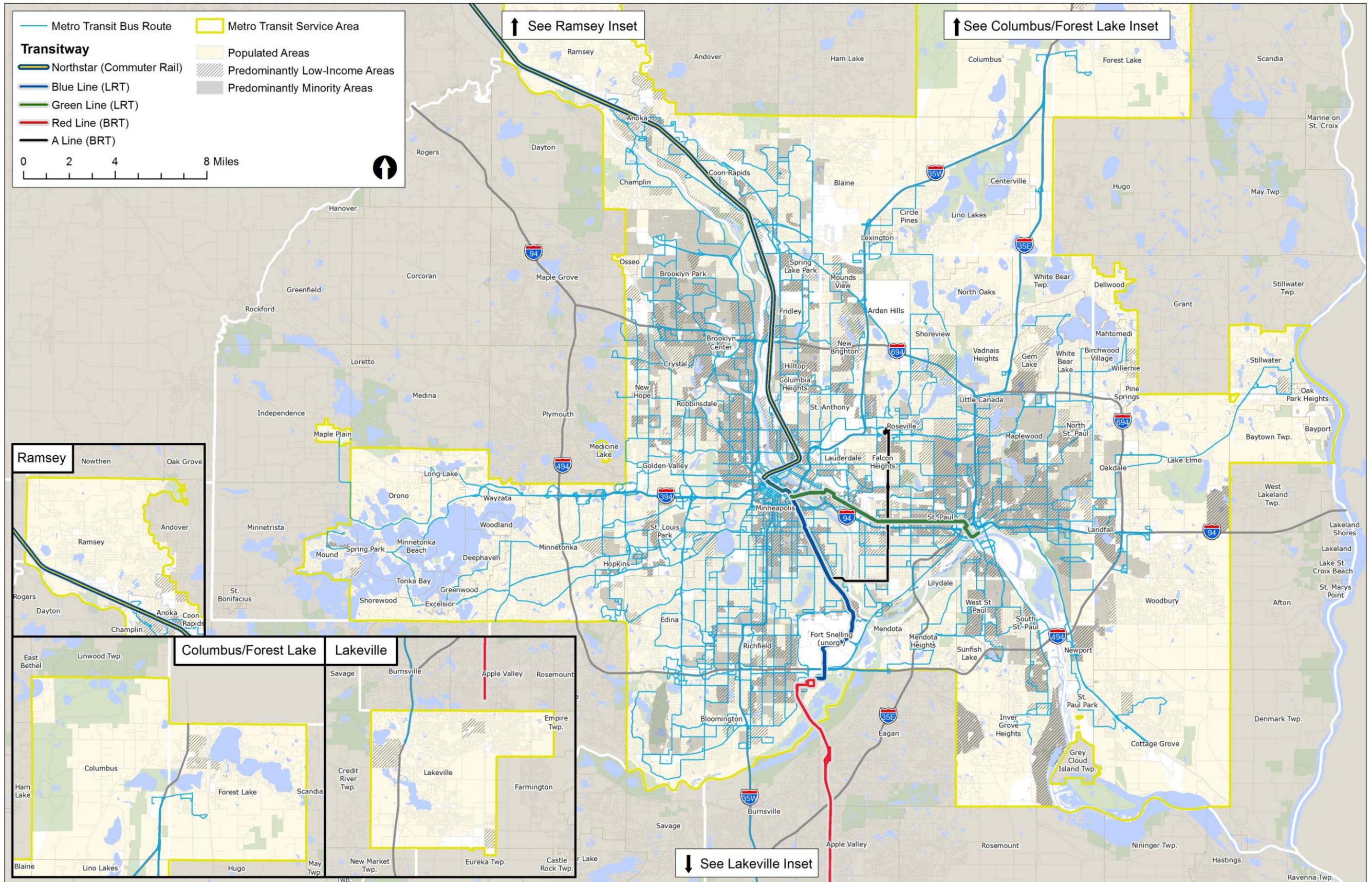
A predominantly low-income area is defined as one where the proportion of low-income persons exceeds the population of low-income persons in the overall service area. Based on data from the 2010 U.S. Decennial Census and 2012-2016 American Community Survey (ACS) Five-Year Estimates, the percentage of low-income persons in the Metro Transit service area is 12.4 percent. Of the 36,735 census blocks inside the service area, 7,367 are identified as predominantly low-income using this definition. Predominantly low-income blocks in the service area are shown in Figure 1.

¹ The distinctions between poverty thresholds and poverty guidelines are described further at <https://aspe.hhs.gov/frequently-asked-questions-related-poverty-guidelines-and-poverty#programs>; and <http://www.irp.wisc.edu/faqs/faq1.htm>.

Table 2. U.S. Census Bureau Poverty Thresholds (in Dollars), 2016

Size of family unit	Weighted average poverty thresholds	Related children under 18 years								
		None	One	Two	Three	Four	Five	Six	Seven	Eight or more
One person (unrelated individual)	12,228									
Under 65 years	12,486	12,486								
65 years and over	11,511	11,511								
Two people	15,569									
Householder under 65 years	16,151	16,072	16,543							
Householder 65 years and over	14,522	14,507	16,480							
Three people	19,105	18,774	19,318	19,337						
Four people	24,563	24,755	25,160	24,339	24,424					
Five people	29,111	29,854	30,288	29,360	28,643	28,205				
Six people	32,928	34,337	34,473	33,763	33,082	32,070	31,470			
Seven people	37,458	39,509	39,756	38,905	38,313	37,208	35,920	34,507		
Eight people	41,781	44,188	44,578	43,776	43,072	42,075	40,809	39,491	39,156	
Nine people or more	49,721	53,155	53,413	52,702	52,106	51,127	49,779	48,561	48,259	46,400

Figure 1. Predominantly Minority and Low-Income Areas



Transit Market Areas

Several of the standards included in this review differ based on the Transit Market Area being evaluated. The Metropolitan Council’s 2040 TPP defines five unique Transit Market Areas based on a combination of population density, intersection density, employment density, and automobile availability. The index is calculated using the following formula:

$$\begin{aligned} \left[\begin{array}{l} \text{Transit} \\ \text{Market} \\ \text{Index} \end{array} \right] &= 0.64(\text{Population Density}) + 0.23(\text{Intersection Density}) \\ &+ 0.20(\text{Employment Density}) + 0.11(\text{Automobile Availability}) \end{aligned}$$

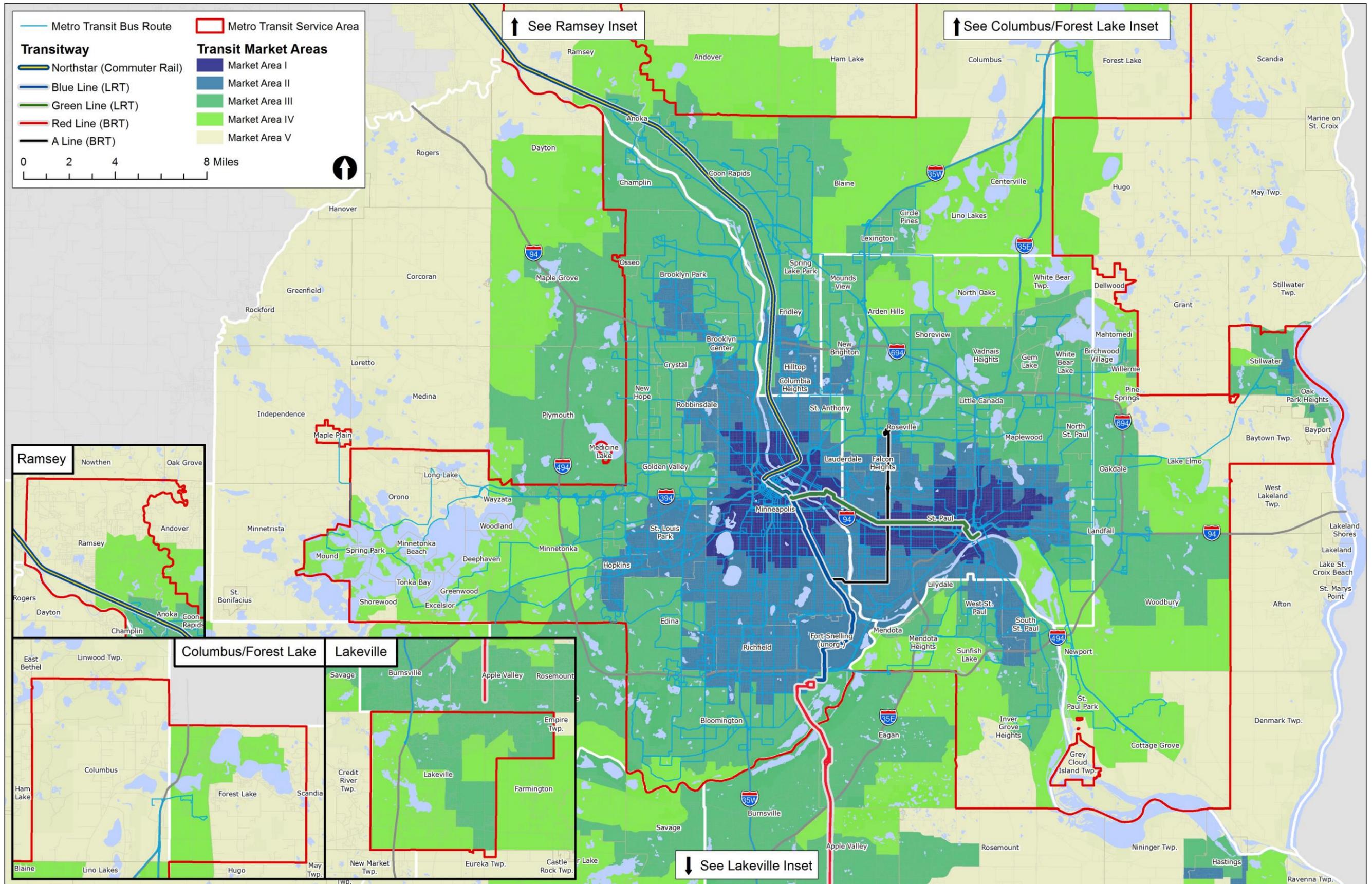
Transit Market Areas define the type of service best suited to an area. Market Area I has the highest concentration of people likely to use transit, and as such has the highest levels of transit service. Market Area V has the lowest concentration of people and jobs and thus can only support the lowest levels of transit service. The relationship between Transit Market Area classification and the Transit Market Index score is shown in Table 3. Two additional Transit Market Area categories include Emerging Market Overlay and Freestanding Town Center.

Table 3. Transit Market Area Characteristics

Transit Market Area	Transit Market Index
1	Above 256
2	Between 128 and 256
3	Between 64 and 128
4	Between 32 and 64
5	Less Than 32

Many of Metro Transit’s transit design standards are custom-tailored for each Transit Market Area. These standards represent typical design guidelines for transit service, though exceptions exist based on specific conditions. Transit Market Area-specific standards are identified in this review where applicable and illustrated in the included figures. The locations of Transit Market Areas throughout the region are shown in Figure 2.

Figure 2. Transit Market Areas



Disparate Impact, Disproportionate Burden, and the Four-Fifths Threshold

The FTA defines “disparate impacts” as facially neutral policies or practices that disproportionately affect members of a group identified by race, color, or national origin, and the recipient’s policy or practice lacks a substantial legitimate justification. If the results of this evaluation indicate a potential for disparate impacts, further investigation is required. Metro Transit has defined its disparate impact threshold using the “four-fifths rule.” The four-fifths rule states that there may be evidence of disparate impacts if:

- Benefits are being provided to minority populations at a rate less than 80 percent (four-fifths) of the benefits being provided to non-minority populations, or
- Adverse effects are being borne by non-minority populations at a rate less than 80 percent (four-fifths) of the adverse effects being borne by minority populations.

The four-fifths rule originates from employment law but is applied in this setting to compare the distribution of benefits and/or adverse impacts among various population groups. The four-fifths rule suggests that a selection rate for any racial, ethnic, or gender group that is less than four-fifths or 80 percent of the rate for the group with the highest selection rate will be regarded as evidence of adverse impact. Although it is a “rule of thumb” and not a legal definition, it is a practical way for identifying adverse impacts that require mitigation or avoidance. Metro Transit’s decision to use the four-fifths rule was subject to a formal public outreach process before being adopted by the Metropolitan Council in 2013.

Metro Transit uses a similar approach when comparing the distribution of benefits and adverse impacts for low-income and non-low-income populations. However, when the distributions for low-income populations fall outside of the four-fifths threshold, this is referred to as a disproportionate burden rather than a disparate impact.

In this analysis, if the quantitative results indicate that service standard compliance in predominantly minority/low-income areas is less than 80 percent of the compliance rate for non-minority/non-low-income areas, this could be evidence of disparate impacts or disproportionate burdens. In these cases, additional analysis will be conducted, and potential mitigation measures will be identified if necessary.

Designation of Predominantly Minority/Low-Income Routes

For the purposes of this analysis, all routes were defined as either predominantly minority or predominantly non-minority and either predominantly low-income or predominantly non-low-income. The FTA Circular 4702.1B defines a minority transit route as “one in which at least one-third of the revenue miles are located in a census block, census block group, or traffic analysis zone where the percentage minority population exceeds the percentage minority population in the service area.” The same criteria apply to the definition of low-income routes. However, the FTA does allow some modification to this standard to account for routes that travel through areas which they do not make stops, such as commuter routes.

Local Routes and Express Routes Not Serving Park-and-Rides

This evaluation used a coverage-based approach for the designation of minority and low-income routes. The service area of each route was defined as a one-quarter mile buffer around each bus stop served by that route. Transitway routes (light rail, commuter rail, and BRT) followed a similar approach using a one-half mile buffer for rail and bus rapid transit stations. These buffers were then compared to the geographic locations of predominantly minority and predominantly low-income areas.

For each route, the total buffer area serving predominantly minority and low-income areas was calculated as a proportion of the route's total service area. This approach has the advantage of automatically excluding non-stop route segments, such as freeway sections of express routes. Routes with at least one-third of their service area in predominantly minority areas were designated as minority routes. Routes with at least one-third of their service area in predominantly low-income areas were designated as low-income routes.

The following steps were also taken to ensure that the service area of each route was accurately represented:

- The bus stop buffers were dissolved for each unique route and route pattern. This was done to avoid the double counting of intersecting buffers at closely spaced stops.
- Each buffer was weighted by the count of weekly trips to account for variations in service frequency for branches, shortlines, etc. This step ensures that high-frequency portions of routes have a higher impact on the demographic make-up of the routes than infrequently served areas.

Express Routes Serving Park-and-Rides

The areas immediately surrounding park-and-ride facilities are not necessarily representative of the demographics of the users of that facility. The designation of routes serving park-and-rides was partially based on the home locations of park-and-ride users at each park-and-ride. Home locations (aggregated to the nearest census block) from the *2016 Regional Park-and-ride System Report* were used to supplement the demographic makeup of each route. The calculation of the percent of each route serving predominantly minority or low-income populations was based on the following formula:

$$\left[\begin{array}{c} \text{Route} \\ \text{Minority} \\ \text{Proportion} \end{array} \right] = \frac{\left(\left[\begin{array}{c} \text{Local} \\ \text{Ridership} \end{array} \right] \times \left[\begin{array}{c} \% \text{ of Service} \\ \text{Area in} \\ \text{Predominantly} \\ \text{Minority Areas} \end{array} \right] \right) + \left(\left[\begin{array}{c} \text{Park} \\ \text{and Ride} \\ \text{Ridership} \end{array} \right] \times \left[\begin{array}{c} \% \text{ of Park and Ride} \\ \text{User Home Locations} \\ \text{in Predominantly} \\ \text{Minority Areas} \end{array} \right] \right)}{\text{Total Route Ridership}}$$

A similar formula was used for the identification of low-income routes. A listing of each Metro Transit route and its minority and low-income route designation status is provided in Appendix A.

Technical Analysis

The following sections describe the analysis and results for the evaluation of each of the service standards required by the FTA. Where possible, the minority and low-income route definitions noted previously are used to compare rates of compliance. Results are included for bus, light rail (METRO Blue Line and METRO Green Line), and commuter rail (Northstar) modes independently. The results for light rail and Northstar are shown primarily for informational purposes. Metro Transit has only one commuter rail route and both of the light rail lines are identified as both minority and low-income routes. It is therefore impossible to make comparisons between these route designations as it is with the bus system.

One additional mode provided by Metro Transit is bus rapid transit (BRT) service, including the Red Line Highway BRT and the A Line Arterial BRT. With the exception of the transit facility amenities analysis, BRT service has been incorporated into the analysis of the local and express bus service. However, characteristics were evaluated against the separate BRT service standards where applicable. For example, the minimum headway standards for BRT are different from the standards for regular bus service, but the overall rates of compliance for bus route headways included both BRT and regular route service. For the transit facility amenities analysis, the Red Line stations were included with the other transitway stations including light rail and commuter rail.

Comparison Index

The results of each analysis below are assessed by calculating a comparison index between the minority and non-minority results, and between the low-income and non-low-income results. In cases where the results measure an adverse impact (i.e., vehicle overloads), the comparison index is measured as the ratio between the non-minority/non-low-income results and the minority/low-income result. In cases where the results measure a positive impact (i.e., compliance with headway standards), the comparison index is measured as the ratio between the minority/low-income results and the non-minority/non-low-income results. In all cases, a comparison index less than 0.80 indicates the potential for disparate impact.

Vehicle Load

The Title VI Circular states the following in regard to vehicle load standards:

Vehicle load can be expressed as the ratio of passengers to the total number of seats on a vehicle. For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees. A vehicle load standard is generally expressed in terms of peak and off-peak times.

Analysis

Metro Transit's vehicle load standards are based on the route type, vehicle type, and peak/off-peak service. In general, peak maximum loads are higher than off-peak maximum loads to account for an acceptable number of standees during periods of high demand. Notable exceptions to this are maximum peak loads on light rail vehicles and on Commuter/Express service with more than four miles of travel on freeways. Metro Transit's maximum vehicle load standards are summarized in Table 4.

Table 4. Maximum Vehicle Load Standards

Route Type	Bus Type	Peak	Off-Peak
Core Local	Standard 40' Bus	48	38
	Articulated 60' Bus	71	57
Supporting Local	Standard 40' Bus	48	38
	Articulated 60' Bus	71	57
	30' Bus	35	28
	Cutaway	21	21
Arterial BRT	Arterial BRT 40' Bus	48	38
	Arterial BRT 60' Bus	71	57
Highway BRT	Standard 40' Bus	44	38
	Articulated 60' Bus	66	57
Commuter/Express (> 4 Miles on Freeway)	Standard 40' Bus	38	38
	Articulated 60' Bus	57	57
	Coach Bus	57	57
Commuter/Express (< 4 Miles on Expressway)	Standard 40' Bus	44	38
	Articulated 60' Bus	66	57
Suburban Local	Standard 40' Bus	48	38
	Articulated 60' Bus	71	57
	30' Bus	35	28
	Cutaway	21	21
Light Rail	Light Rail Vehicle (per car)	132	132

This evaluation of the bus system used data from Metro Transit/Metropolitan Council's automatic passenger counter (APC) system to examine vehicle loads. Weekday APC data was collected and evaluated for the Fall 2017 pick period. Loads on Saturday and Sunday were excluded from the analysis since ridership is generally lower than weekday ridership and weekend overloads are rare. Similar vehicle load data is not available for LRT or Northstar service. Periodic in-person spot checks of the LRT system are conducted by Metro Transit staff to assess ridership and vehicle load patterns. Vehicle load on Northstar vehicles is monitored by the conductors. No significant overload issues have been identified for either service during standard (non-event-related) service.

For each trip, the maximum passenger load was compared to the number of seats available on the bus type assigned to that trip. Overloaded trips were identified based on the maximum vehicle load standards summarized above. The number of total trips and overloaded trips were then aggregated by route and scheduled trip number. On average, 48 trips were observed for each unique trip during this period.

Occasional overloads are to be expected due to natural variations in transit demand and special events. Metro Transit considers overloads to be an issue needing to be addressed if they are "consistently overloaded." Individual route trips are considered to be consistently overloaded if they experience an overload on two or more days per week. Because a trip has an equal probability of being sampled on any weekday, this review considered a trip that was overloaded 40 percent or more of the time (two days per five-day week) to be consistently overloaded.

Two approaches were used to evaluate the vehicle load data:

- The first approach compared the overall percentage of overloaded trips on minority or low-income routes to the percentage of overloaded trips on non-minority or non-low-income routes.
- The second approach is similar to the first but used the percent of trips that are consistently overloaded as the comparison rather than the overall rate of overloaded trips.

Results

Out of the 357,301 observed trips included in the data, only 5,339 (1.5 percent) were found to be overloaded. Table 5 summarizes the percent of all observed trips with overloads by mode for minority routes, non-minority routes, low-income routes, and non-low-income routes.

- Minority route trips experienced an overall overload rate of 1.37 percent. This is less than the average of 1.73 percent for non-minority routes, resulting in a comparison index of 1.27

- Low-income route trips also experienced an overall overload rate of 1.26 percent. This is less than the average of 2.18 percent for non-low-income routes, resulting in a comparison index of 1.73.

These results indicate that the proportion of overloaded trips is higher for non-minority and non-low-income routes than it is for minority and low-income routes.

Table 5. Percent of All Observed Trips with Overloads

Mode	Minority Routes	Non-Minority Routes	Comparison Index	Low-Income Routes	Non-Low-Income Routes	Comparison Index
Bus	1.37%	1.73%	1.27	1.26%	2.18%	1.73
Light Rail	No Data	n/a	-	No Data	n/a	-
Northstar Commuter Rail	n/a	No Data	-	n/a	No Data	-

Table 6 summarizes the percent of all observed trips that are consistently overloaded by mode for minority routes, non-minority routes, low-income routes, and non-low-income routes.

- Minority bus trips experienced a consistently overloaded rate of 0.27 percent. This is less than the average of 0.45 percent for non-minority routes, resulting in a comparison index of 1.63.
- Low-income bus trips experienced a consistently overloaded rate of 0.28 percent. This is less than the average of 0.48 percent for non-low-income routes, resulting in a comparison index of 1.69.

Table 6. Percent of Trips Consistently Overloaded

Mode	Minority Routes	Non-Minority Routes	Comparison Index	Low-Income Routes	Non-Low-Income Routes	Comparison Index
Bus	0.27%	0.45%	1.63	0.28%	0.48%	1.69
Light Rail	No Data	n/a	-	No Data	n/a	-
Northstar Commuter Rail	n/a	No Data	-	n/a	No Data	-

The results of these analyses indicate that minority and low-income routes experience fewer consistently overloaded trips as well as fewer overloaded trips overall compared to non-minority and non-low-income routes.

Based on this analysis, no potential for disparate impact to minority populations or disproportionate burden to low-income populations is identified for the vehicle load standard.

Vehicle Headway

The Title VI Circular states the following in regard to vehicle headway standards:

Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. A shorter headway corresponds to more frequent service. Vehicle headways are measures in minutes; service frequency is measures in vehicles per hour. Headways and frequency of service are general indications of the level of service provided along a route. Vehicle headway is one component of the amount of travel time expended by a passenger to reach his/her destination. A vehicle headway standard is generally expressed for peak and off-peak service as an increment of time (e.g., peak: every 15 minutes; and off-peak: every 30 minutes).

Analysis

The regional headway standards are outlined in the 2040 TPP and the Metropolitan Council's Regional Transitway Guidelines. Minimum headways are stated for peak and off-peak conditions for each of the five transit market areas. Metro Transit's minimum headway standards are summarized in Table 7.

Table 7. Minimum Headway Standards

Route Type	Market Area I	Market Area II	Market Area III	Market Area IV	Market Area V
Core Local Bus	15" Peak 30" Off-peak 30" Weekend	30" Peak 60" Off-peak 60" Weekend	60" Peak 60" Off-peak 60" Weekend	n/a	n/a
Supporting Local Bus	30" Peak 30" Off-peak 30" Weekend			n/a	n/a
Suburban Local Bus	n/a			n/a	n/a
Arterial BRT	15" Peak			n/a	n/a
Highway BRT	15" Off-peak			n/a	n/a
Light Rail	15" Weekend			n/a	n/a
Commuter Express Bus	30" Peak		3 Trips each Peak Period		n/a
Commuter Rail	n/a		30" Peak		

For the purposes of this evaluation peak and off-peak headways were calculated using midday and p.m. peak period service levels. The 10:00 a.m. to 2:00 p.m. time period was used for midday service and the 3:00 to 6:30 p.m. time period was used for peak service.

Schedule information for the Fall 2017 was used as the baseline for this analysis. Using this data, the average peak and midday headways were calculated at each stop or station of each route. The headways at each stop and station were evaluated against the standards shown above to assess their compliance with the appropriate standard. This information was then

aggregated to the route level to calculate the percentage of stops or stations along a route that are in compliance with the headway standards.

This analysis evaluated the headways for each route independently of all other transit service per Metro Transit’s headway standards. A single stop or station may be used by multiple routes and have a combined headway that is much better than the headway of each individual route. The total number of unique combinations of route and stop/station will be greater than the total number of stops in the system

Results

Peak

Out of the 16,008 unique combinations of route and stop/station in the peak period, 11,015 (68.8 percent) meet the peak headway standards. Table 8 summarizes the percent of stops or stations meeting the headway standards for the peak period by mode for minority routes, non-minority routes, low-income routes, and non-low-income routes.

- 68.0 percent of the stops and stations on minority routes are compliant with the peak headway standards. This is slightly lower than the compliance rate for non-minority routes at 70.0 percent. The resulting comparison index of 0.97 is within the four-fifths threshold.
- 68.4 percent of the stops and stations on low-income routes are compliant with the peak headway standards. This is slightly lower than the compliance rate for non-low-income routes at 69.3 percent. The resulting comparison index of 0.99 is within the four-fifths threshold.

Table 8. Percent of Stops or Stations Meeting Peak Headway Standards

Mode	Minority Routes	Non-Minority Routes	Comparison Index	Low-Income Routes	Non-Low-Income Routes	Comparison Index
Bus	68.0%	70.0%	0.97	68.4	69.3	0.99
Light Rail	100%	n/a	-	100%	n/a	-
Northstar Commuter Rail	n/a	100%	-	n/a	100%	-

Midday

Out of the 10,135 unique combinations of route and stop/station in the midday period, 9,589 (94.6 percent) meet the headway standards. Table 9 summarizes the percent of stops or stations meeting the headway standards for the midday period by mode for minority routes, non-minority routes, low-income routes, and non-low-income routes.

- 93.9 percent of the stops and stations on minority routes are compliant with the midday headway standards. This is slightly lower than the compliance rate for non-minority routes at 96.2 percent. The resulting comparison index of 0.98 is within the four-fifths threshold.
- 96.0 percent of the stops and stations on low-income routes are compliant with the midday headway standards. This is higher than the compliance rate for non-low-income routes at 90.6 percent, resulting in a comparison index of 1.06.

Table 9. Percent of Stops or Stations Meeting Midday Headway Standards

Mode	Minority Routes	Non-Minority Routes	Comparison Index	Low-Income Routes	Non-Low-Income Routes	Comparison Index
Bus	93.9	96.2	0.98	96.0	90.6	1.06
Light Rail	100%	n/a	-	100%	n/a	-
Northstar Commuter Rail	n/a	100%	-	n/a	100%	-

The results of these analyses indicate that compliance with the peak and midday headway standards is largely similar between each of the route designations.

Based on this analysis, no potential for disparate impact to minority populations or disproportionate burden to low-income populations is identified for the vehicle headway standard.

On-Time Performance

The Title VI Circular states the following in regard to on-time performance standards:

On-time performance is a measure of runs completed as scheduled. This criterion first must define what is considered to be “on time.” For example, a transit provider may consider it acceptable if a vehicle completes a scheduled run between zero and five minutes late in comparison to the established schedule.

Analysis

Metro Transit’s on-time performance goal for each service mode changes from pick to pick and year to year. This analysis compares the overall proportion of on-time trips between minority routes and non-minority routes and between low-income routes and non-low-income routes for the Fall 2017 pick. Each mode has a unique definition for what is considered “on-time.” The definitions are as follows:

- **Bus** service is considered on-time if it arrives at scheduled timepoints between 1 minute early and 5 minutes late.
- **Light Rail and Commuter Rail** service is considered on-time if it arrives at stations between 1 minute early and 4 minutes late.

The analysis of bus service used weekday on-time performance data collected using automated vehicle locator (AVL) equipment on Metro Transit and Metropolitan Council buses and commuter trains. Weekend on-time performance is not as frequently an issue due to lower traffic volumes and congestion. The percent of trips arriving on-time was calculated for each route individually for the Fall 2017 pick. The percent of on-time trips was then aggregated to each mode. The calculation for the percent of on-time trips for bus service was weighted by the number of daily trips available on each route to more accurately represent the on-time performance of the system. The analysis then compared the on-time performance results for minority and low-income route trips to the on-time performance results for non-minority and non-low-income route trips.

On-time performance data for LRT was evaluated using Supervisory Control and Data Acquisition (SCADA) data aggregated to a monthly summary for a similar time period.

Results

The total percentage of on-time trips by mode for minority routes, non-minority routes, low-income routes, and non-low-income routes is summarized in Table 10. A summary of the on-time performance for each route is provided in Appendix B.

- Minority bus trips experienced an on-time performance rate of 84.8 percent compared to a rate of 84.7 percent for non-minority routes, resulting in a comparison index of 1.00.
- Low-income bus trips experienced an on-time performance rate of 84.9 percent compared to a rate of 84.6 percent for non-low-income routes, resulting in a comparison index of 1.00.

Table 10. Percent of Trips Arriving On-Time

Mode	Minority Routes	Non-Minority Routes	Comparison Index	Low-Income Routes	Non-Low-Income Routes	Comparison Index
Bus	84.8%	84.7%	1.00	84.9%	84.6%	1.00
Light Rail	80.6%	n/a	-	80.6%	n/a	-
Northstar Commuter Rail	n/a	88.5%	-	n/a	88.5%	-

Based on this analysis, no potential for disparate impact to minority populations or disproportionate burden to low-income populations is identified for the on-time performance standard.

Service Availability

The Title VI Circular states the following in regard to service availability standards:

Service availability is a general measure of the distribution of routes within a transit provider's service area. For example, a transit provider might set a service standard to distribute routes such that a specified percentage of all residents in the service area are within a one-quarter mile walk of bus service or a one-half mile walk of rail service. A standard might also indicate the maximum distance between stops or stations.

Metro Transit evaluates the service availability standard based on three separate criteria: route spacing, midday service availability, and bus stop spacing.

Analysis: Route Spacing

Metro Transit's route spacing standards are outlined in the 2040 TPP. Standards are defined for core local bus, supporting local bus, and suburban local bus route types within Market Areas I and II. Route spacing in other Market Areas is designed to meet the specific demographics, geography, and transit needs of each area. Similarly, express routes and limited stop route that function like express routes on freeway segments are designed according to the availability and demand of specific highway corridors. The function and purpose of the routes evaluated under the route spacing criteria are as follows:

- **Core Local** routes are designed primarily to serve urban areas along dense corridors and comprise the basic framework of the all-day bus network.
- **Supporting Local** routes serve urban areas on crosstown corridors that typically do not connect to a major regional center and are designed to complete the grid of urban bus routes and facilitate connections to core local routes and transitways.
- **Suburban Local** routes typically operate in Market Areas II and III in a suburban context and are often less productive than Core Local routes. Their role is to provide a basic level of transit coverage throughout the region.

The 2040 TPP route spacing standards are summarized in Table 11.

Table 11. Maximum Route Spacing Standards

Route Type	Market Area I	Market Area II
Core Local	0.5 miles	1 mile
Supporting Local	1 mile	1-2 miles
Suburban Local	n/a	2 miles

Individual analyses were conducted for Core Local routes in Market Area I, Supporting Local routes in Market Area I, and all local routes in Market Area II. Because service in Market Area II is provided with a mix of Core Local, Supporting Local, and Suburban Local routes, a universal standard of 1 mile spacing was used as a consistent measure for service availability, independent of route type designations. A higher level of scrutiny was applied in this review than is specified in the TPP standards.

Using GIS, buffers were created around each route based on the route type and the Market Area being analyzed. For example, a half-mile buffer (half of the 1 mile spacing standard) was created around core local routes in Market Area I. Areas that do not fall within this buffer area would not meet the maximum spacing standard for core local routes in Market Area I. For each analysis, the buffer coverage area was overlaid against census blocks in order to compare the proportion of predominantly minority areas meeting the route spacing standard to the proportion of non-minority areas meeting the standard. This same process was used to compare the proportion of predominantly low-income areas meeting the standard to the proportion of non-low-income areas meeting the standard.

Results: Route Spacing

The results of these analyses are shown in Table 12. The location of predominantly minority and low-income areas as they relate to the route coverage areas under each analysis are shown in Figure 3, Figure 4, and Figure 5.

Core Local (Market Area I)

Core Local route coverage in Market Area I is very high. Approximately 95 percent of all populated areas in Market Area I meet the Core Local route spacing standards.

- 95.5 percent of the predominantly minority areas in Market Area I meet the Core Local route spacing standard. This is higher than the proportion of non-minority areas meeting the standard at 94.8 percent, resulting in a comparison index of 1.01
- 95.2 percent of the predominantly low-income areas in Market Area I meet the Core Local route spacing standard. This is slightly lower than the proportion of non-low-income areas meeting the standard at 95.5 percent, but the resulting comparison index of 1.00 is within the four-fifths threshold.

Supporting Local (Market Area I)

The coverage of Supporting Local routes in Market Area I is substantially lower than the coverage for the other route categories. This is primarily due to the limited Supporting Local service in portions of Saint Paul east of downtown and south of the Mississippi River. While these areas are heavily covered by core local service, the configuration of the street network and a number of natural barriers make the implementation of supporting local difficult.

Metro Transit is aware of these supporting local service gaps and makes efforts to restructure service to provide adequate transit service when feasible.

- 70.3 percent of the predominantly minority areas in Market Area I meet the Supporting Local route spacing standard. This is higher than the proportion of non-minority areas meeting the standard at 61.4 percent, resulting in a comparison index of 1.15.
- 66.8 percent of the predominantly low-income areas in Market Area I meet the Supporting Local route spacing standard. This is slightly lower than the proportion of non-low-income areas meeting the standard at 67.9 percent, but the resulting comparison index of 0.98 is within the four-fifths threshold.

All Local Routes (Market Area II)

Local route service in Market Area II is nearly universal. Approximately 98 percent of all populated areas in this Market Area II meet or exceed the local route spacing standards.

- 98.2 percent of the predominantly minority areas in Market Area I meet or exceed the local route spacing standard. This is higher than the proportion of non-minority areas meeting the standard at 97.6 percent.
- 99.6 percent of the predominantly low-income areas in Market Area I meet or exceed the local route spacing standard. This is higher than the proportion of non-low-income areas meeting the standard at 97.0 percent.

Table 12. Percent of Areas Meeting Route Spacing Standards

Route Type	Pred. Minority Areas	Pred. Non-Minority Areas	Comparison Index	Pred. Low-Income Areas	Pred. Non-Low-Income Areas	Comparison Index
Core Local (MA I)	95.5%	94.8%	1.01	95.2%	95.5%	1.00
Supporting Local (MA I)	70.3%	61.4%	1.15	66.8%	67.9%	0.98
Suburban Local (MA II)	98.2%	97.6%	1.01	99.6%	97.0%	1.03

Based on this analysis, no potential for disparate impact to minority populations or disproportionate burden to low-income populations is identified for the service availability (route spacing) standard.

Figure 3. Core Local Spacing (Market Area I)

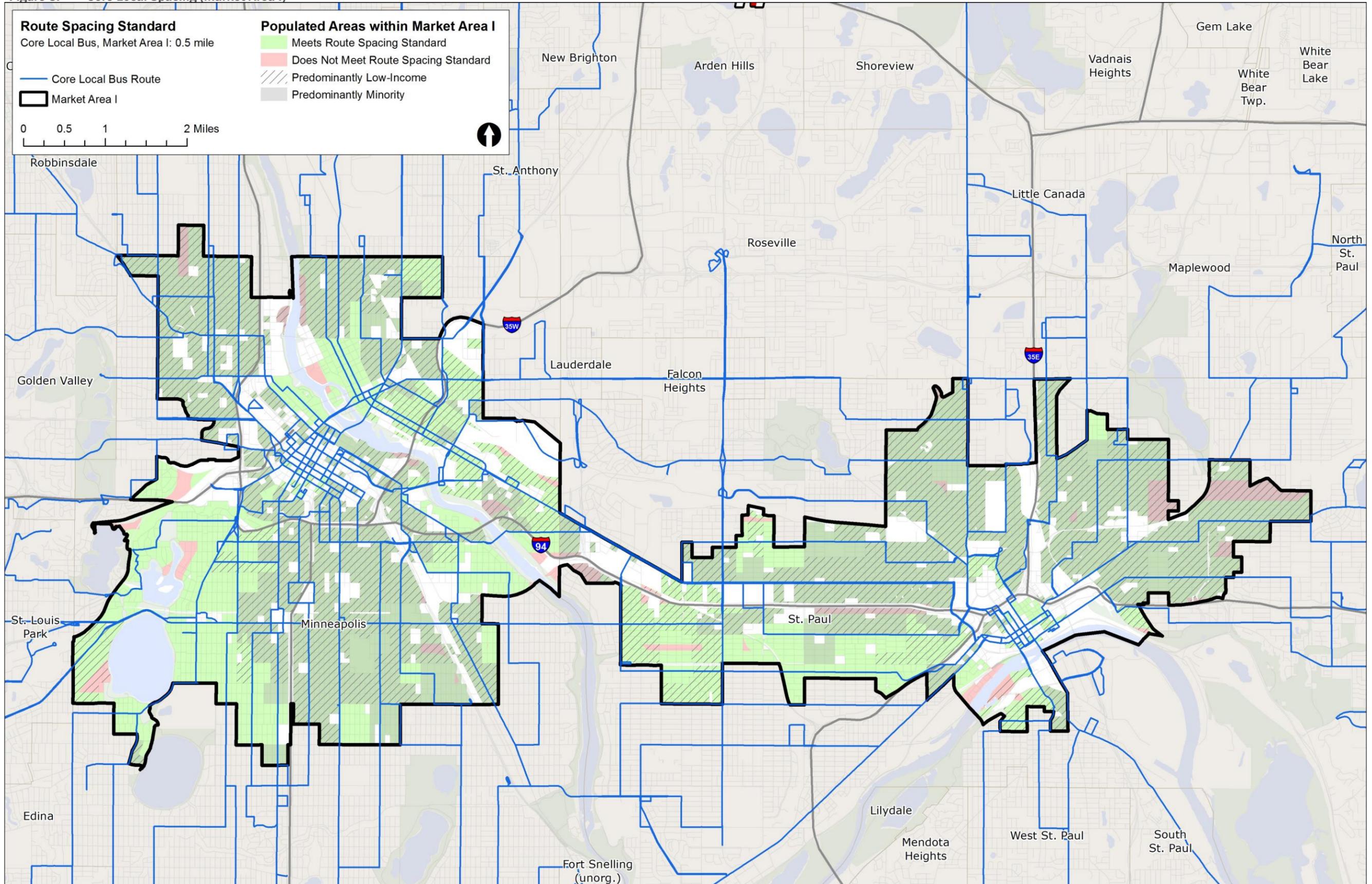


Figure 4. Supporting Local Spacing (Market Area I)

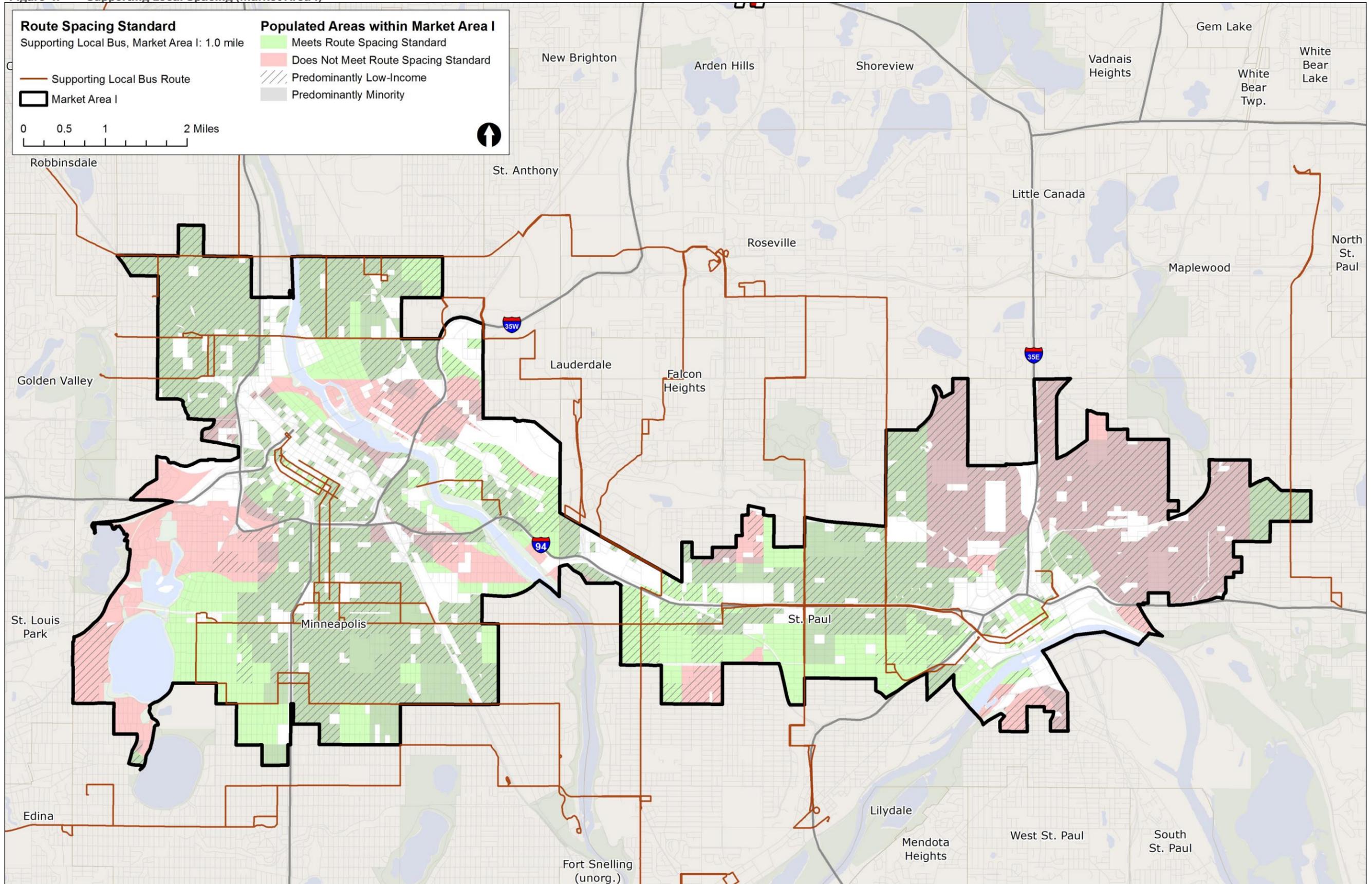
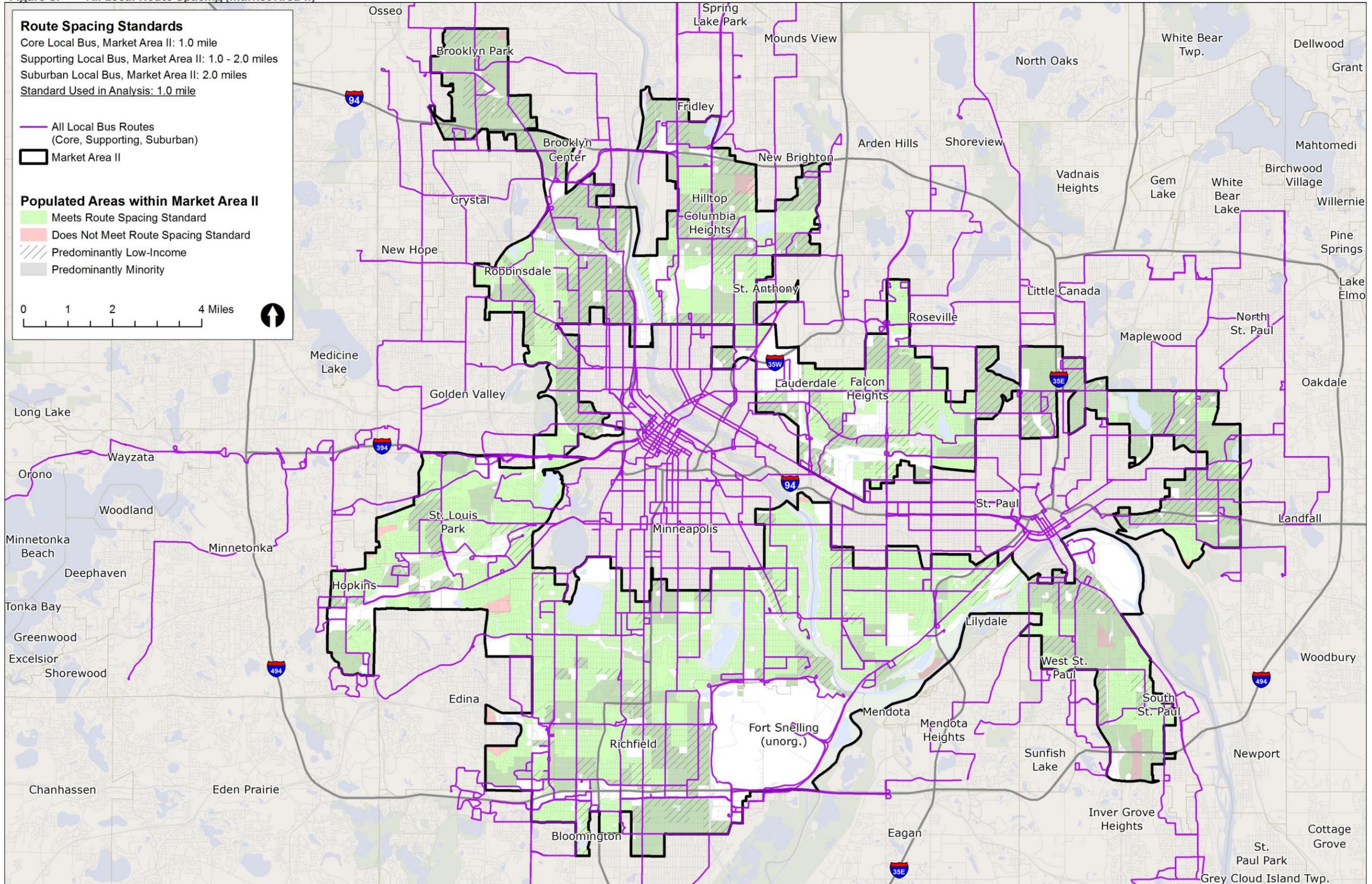


Figure 5. All Local Route Spacing (Market Area II)



Analysis: Midday Service Availability

Service availability was evaluated based on the presence of transit service meeting the required headway during the midday off-peak period. The Route Type and Transit Market Area-specific headway standards identified in the 2040 TPP are as follows:

Table 13. Minimum Off-Peak Headway Standards

Route Type	Market Area I	Market Area II	Market Area III	Market Area IV	Market Area V
Core Local Bus	30"	60"	60"	n/a	
Supporting Local Bus	30"				
Suburban Local Bus	n/a				
Arterial BRT	15"				
Highway BRT					
Light Rail					
Commuter Express Bus	n/a				
Commuter Rail	n/a				

Schedule information for the Fall 2017 was used as the baseline for this analysis. The hours between 11:00 a.m. and 2:00 p.m. on weekdays were assumed for midday service. Using this data, the average combined midday headway was calculated for each stop and station within Market Areas I, II, and III. A quarter-mile buffer was created around all bus stops meeting the combined headway standard. For BRT and LRT stations meeting the standard a half-mile buffer was used.

The service coverage area was overlaid against census blocks located both within Market Areas I, II, and III and within Metro Transit's service area in order to compare the proportion of predominantly minority areas meeting the midday service availability standard to the proportion of non-minority areas meeting the standard. This same process was used to compare the proportion of predominantly low-income areas meeting the standard to the proportion of non-low-income areas meeting the standard.

Results: Midday Service Availability

The results of this analysis are shown in Table 14. The location of predominantly minority and low-income areas as they relate to the midday service availability coverage area are shown in Figure 6.

- 63.2 percent of the predominantly minority areas in Market Areas I, II, and III meet the midday service availability standard. This is significantly higher than the proportion of non-minority areas meeting the standard at 36.5 percent.
- 71.6 percent of the predominantly low-income areas in Market Areas I, II, and III meet the midday service availability standard. This is significantly higher than the proportion of non-low-income areas meeting the standard at 35.4 percent.

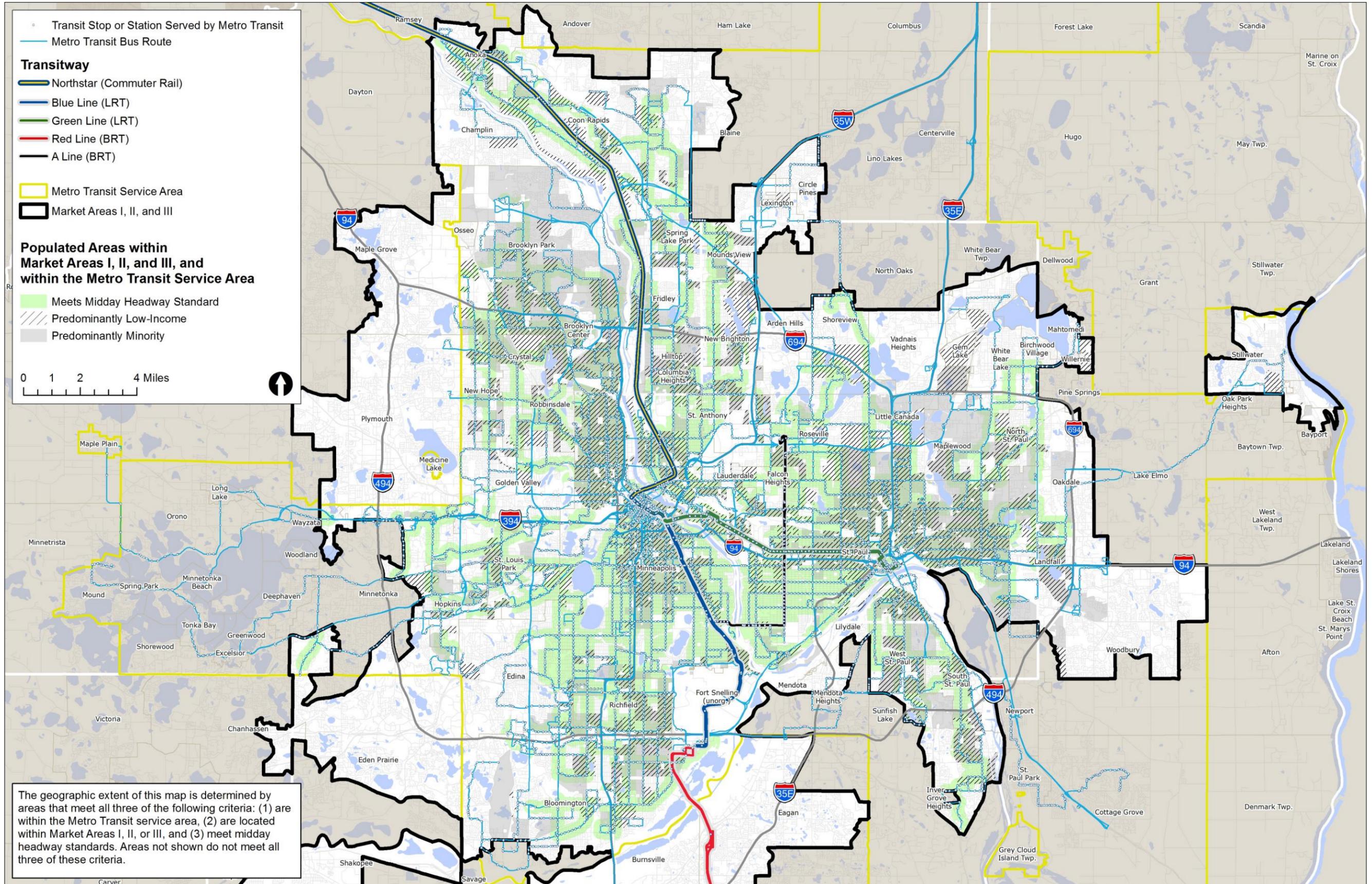
Table 14. Percent of Areas Meeting Midday Service Availability Standards

Area	Pred. Minority Areas	Pred. Non-Minority Areas	Comparison Index	Pred. Low-Income Areas	Pred. Non-Low-Income Areas	Comparison Index
Market Area I	96.6%	87.2%	1.11	95.3%	88.0%	1.08
Market Area II	78.4%	78.3%	1.00	85.1%	74.9%	1.14
Market Area III	38.3%	23.1%	1.66	48.6%	21.7%	1.14
Market Areas I-III Combined	63.2%	36.5%	1.73	71.6%	35.4%	2.02

Midday service availability is substantially higher for predominantly minority and low-income areas. This result is heavily influenced by the much higher non-minority and non-low-income populations in Market Area III, relative to Market Areas I and II. Market Area III's relative lack of coverage is reflected in the low total results for percent of non-minority and non-low-income areas meeting midday service availability standards.

Based on this analysis, no potential for disparate impact to minority populations or disproportionate burden to low-income populations is identified for the service availability (midday service availability) standard.

Figure 6. Midday Service Availability (Market Areas I, II, III)



Analysis: Bus Stop and Station Spacing

Metro Transit’s bus stop spacing guidelines are provided in the 2040 TPP. The text notes that, “Stop spacing guidelines must balance between providing greater access to service with faster travel speed.” The recommended stop and station spacing is as follows:

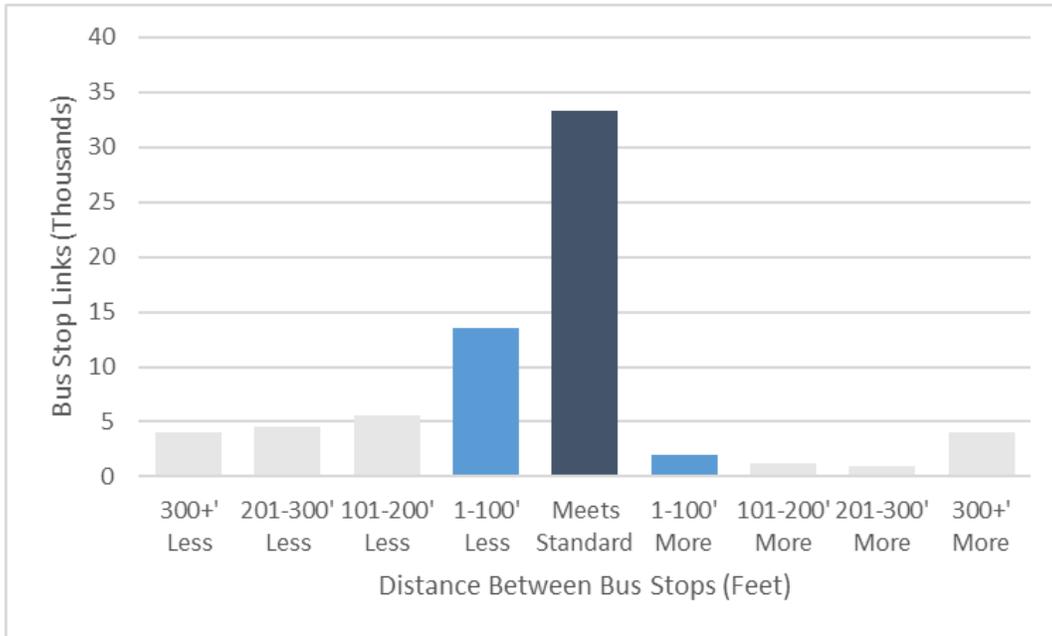
Table 15. Stop/Station Spacing Guidelines

Route Type	Typical Spacing
Core Local Bus	1/8 to 1/4 mile
Supporting Local Bus	1/8 to 1/4 mile
Suburban Local Bus	1/8 to 1/4 mile
Arterial BRT	1/4 to 1/2 mile
Highway BRT	1/2 to 2 miles
Light Rail	1/2 to 1 mile
Commuter Express Bus	Market Specific
Commuter Rail	5 to 7 miles

The standard of 1/8 to 1/4 miles between stops was used as the basis for this review for all local bus service, including local portions of limited stop and express routes. This represents a distance of 660 to 1,320 feet between bus stops. To account for cases where street networks or other geographic features do not allow for stop spacing precisely within the 2040 TPP-defined range, this review expanded the allowable range by considering stop spacing within 100 feet of the prescribed range acceptable (560 to 1,420 feet between stops). This approach also accounts for slight variations due to alternating near-side and far-side bus stop locations. To avoid the inclusion of non-stop portions of limited-stop or express routes, bus stop links greater than 0.5 miles were excluded from the analysis. A bus stop link is defined as the path along the roadway network between adjacent bus stops.

Figure 7 below displays the frequency of bus stop spacing for all bus stop links. The dark blue column represents the count of stop links meeting the bus stop spacing standard as outlined in the TPP. The light blue columns on either side represent stops links falling within 100 feet of the TPP standard. These light blue areas were assumed to meet the standard for the purpose of this analysis. In total, 71 percent of Metro Transit’s bus stop link distances fall within 100 feet of the TPP standard.

Figure 7. Bus Stop Spacing Frequency



For the evaluation of each mode, the percentage of stop links meeting the standards outlines above was compared between minority and low-income routes to the percentage of stop links meeting the standards on non-minority and non-low-income routes. Bus rapid transit stop links were incorporated into the final results for all bus service but were evaluated based on their individual spacing standard.

Results: Bus Stop and Station Spacing

The results of the analysis are shown in Table 16. A total of 71 percent of the bus stop links comply with the spacing standard for this evaluation.

- 70.5 percent of the bus stops on minority routes are compliant with the bus stop spacing standard compared with 63.0 percent of bus stops on non-minority routes.
- 70.9 percent of the bus stops on low-income routes are compliant with the bus stop spacing standard compared with 60.8 percent of bus stops on non-low-income routes.

Table 16. Percent of Stop and Station Links Meeting Spacing Standards

Mode	Minority Routes	Non-Minority Routes	Comparison Index	Low-Income Routes	Non-Low-Income Routes	Comparison Index
Bus	70.5%	63.0%	1.12	70.9%	60.8%	1.17
Light Rail	92.3%	n/a	-	92.3%	n/a	-
Northstar Commuter Rail	n/a	66.7%	-	n/a	66.7%	-

All of the stations on the Green Line light rail corridor comply with the minimum station spacing standard. Two of the station links on the Blue Line light rail corridor are below the minimum spacing standard. These links are between the 28th Avenue and Bloomington Central stations and between the Bloomington Central and American Boulevard/34th Avenue stations.

Only two-thirds of the station links on the Northstar commuter rail comply with the minimum station spacing standard. The placement of the Anoka station causes this issue as it is located only 1.9 miles from the Coon Rapids Riverdale station and 4.1 miles from the Ramsey station.

Based on this analysis, no potential for disparate impact to minority populations or disproportionate burden to low-income populations is identified for the service availability (bus stop spacing) standard.

Transit Amenities

The Title VI Circular states the following in regard to distribution of transit amenity standards:

Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public. Fixed route transit providers must set a policy to ensure equitable distribution of transit amenities across the system.

Metro Transit's transit amenity evaluation includes a review of bus shelters, customer information, and the distribution of amenities in facilities such as park-and-rides, transit centers, and transitway stations. This evaluation reviews the status of regional transit amenities that were in place as of the Fall 2017 pick.

For this analysis, transit amenities placed at fixed-route bus stops are evaluated separately from those amenities placed at transit centers, LRT stations, and park-and-rides. However, it is important to note the significant rider crossover between the various modes and facilities. In particular, many riders use both the local bus system in addition to the LRT system. The benefits that these riders received from LRT station amenities will not be reflected in the assessment of benefits at local bus stops.

In late 2014, Metro Transit reinforced its commitment to providing equitable distribution of transit amenities by launching the Better Bus Stops program, partially funded by a federal Ladders of Opportunities grant. This program has invested in bus stop improvements focused in areas of concentrated poverty where more than half the residents identify as people of color.

As part of the Better Bus Stops Program, in January 2018, Metro Transit updated the bus stop shelter placement guidelines, including guidelines for placement of lights and heat. These guidelines are summarized in Table 17 and will be reflected in the Council's next Title VI Plan in 2020.

Table 17. Shelter Placement Guidelines

Shelter Improvement	Criteria
Consider adding a shelter (highest priority)	100+ daily boardings and priority location
Consider adding a shelter (high priority)	100+ daily boardings
Consider adding a shelter (medium priority)	30+ daily boardings and priority location
Consider adding a shelter (lower priority)	30+ daily boardings
Replace shelter	At least 15 daily boardings
Remove shelter	Fewer than 15 daily boardings
Consider adding light to shelter	Not a standard shelter feature. Prioritized based on boardings from sunset to sunrise, personal security concerns, and site factors.
Consider adding heat to shelter	Not a standard shelter feature. Considered where there are 100+ daily boardings.

Priority locations include areas where more households do not have cars, near hospitals, healthcare clinics, social service providers, housing for people with disabilities or older adults, and major transit transfer points.

Analysis: Bus Shelter Distribution

This analysis compares the rates of bus shelter distribution at warranted and unwarranted shelter placements. For the purpose of this analysis, bus shelters were considered warranted if placed at stops with 30 daily boardings or more.

This analysis was conducted at the bus stop level, designating each stop as either minority or non-minority and either low-income or non-low-income based on the classification of routes serving each stop. If more than half of the trips serving a bus stop were from minority bus routes, the stop was considered a minority bus stop. Likewise, if more than half of the trips serving a bus stop were from low-income bus routes, the stop was considered a low-income bus stop.

Information on the number of average daily boardings at each bus stop was reviewed to identify stops meeting the ridership thresholds for shelter placement. This was then compared to the current database of existing bus shelter locations. The rates of shelter distribution were evaluated using two approaches:

- The first approach compared the distribution rates of warranted shelters (those with ridership above the appropriate thresholds) at minority and low-income bus stops to the distribution rates at non-minority and non-low-income bus stops.
- The second approach repeated these comparisons for the distribution of unwarranted shelters (those with ridership below the appropriate thresholds).

A similar approach was used to compare the distribution rates of warranted and unwarranted shelter heaters. For this analysis, stops with daily boardings of 100 or more were considered warranted for heater placement. However, it is understood that the placement of shelter heaters is not a standard feature and will depend on other factors such as site suitability and the availability of an electrical connection.

Since the placement of shelter lights is largely dependent on individual site characteristics, this review assessed the overall distribution rate of lights at stops with shelters. In this analysis lighting means a light in the shelter itself and does not take streetlights or other ambient lighting into consideration.

Results: Bus Shelter Distribution

The results of these analyses are shown in Table 18. The locations of warranted and unwarranted shelters are shown in Figure 8. The locations of warranted and unwarranted heaters and lighting are shown in Figure 9. Out of the 11,479 bus stops identified in this evaluation as having boarding or alighting activity, 1,306 (11.4 percent) meet the ridership warrant for a shelter and 290 (2.5 percent) meet the ridership warrant for heat.

- The placement rate of shelters at minority stops meeting the warrant is 54.3 percent. This is higher than the placement rate of shelters at non-minority stops meeting the shelter warrant at 50.0 percent.
- The placement rate of shelters at low-income stops meeting the warrant is 55.1 percent. This is higher than the placement rate of shelters at non-low-income stops meeting the shelter warrant at 43.4 percent.
- The placement rate of shelters at minority stops not meeting the warrant is 3.4 percent. This is higher than the placement rate of shelters at non-minority stops not meeting the warrant at 1.6 percent.
- The placement rate of shelters at low-income stops not meeting the warrant is 3.6 percent. This is higher than the placement rate of shelters at non-low-income stops not meeting the warrant at 1.3 percent.

Heaters

- The placement rate of heaters at minority stops meeting the warrant is 18.1 percent. This is lower than the placement rate of heaters at non-minority stops meeting the warrant at 54.7 percent and **the resulting comparison index of 0.33 is not within the four-fifths threshold.**
- The placement rate of heaters at low-income stops meeting the warrant is 22.1 percent. This is lower than the placement rate of heaters at non-low-income stops meeting the warrant at 54.0 percent and **the resulting comparison index of 0.41 is not within the four-fifths threshold.**

- The placement rate of heaters at minority stops not meeting the warrant is 2.9 percent. This is lower than the placement rate of shelters at non-minority stops not meeting the warrant at 15.6 percent and **the resulting comparison index of 0.18 is not within the four-fifths threshold.**
- The placement rate of heaters at low-income stops not meeting the warrant is 6.2 percent. This is higher than the placement rate of heaters at non-low-income stops not meeting the warrant at 3.0 percent.

Lighting

- The overall placement rate of lighting at minority stops with shelters is 41.2 percent. This is lower than the placement rate of lighting at non-minority stops with shelters at 51.1 percent, but the resulting comparison index of 0.81 is within the four-fifths threshold.
- The overall placement rate of lighting at low-income stops with shelters is 44.2 percent. This is higher than the placement rate of lighting at non-low-income stops with shelters at 12.5 percent.

Table 18. Bus Shelter and Shelter Amenity Placement Rates

Bus Stop Amenity	Minority Stops	Non-Minority Stops	Comparison Index	Low-Income Stops	Non-Low-Income Stops	Comparison Index
Shelters (At Warranted Stops)	54.3%	50.6%	1.07	55.1%	44.4%	1.24
Shelters (At Unwarranted Stops)	3.4%	1.5%	2.26	3.6%	1.2%	3.01
Heaters (At Warranted Stops)	18.1%	54.7%	0.33	22.1%	54.0%	0.41
Heaters (At Unwarranted Stops)	2.9%	15.6%	0.18	6.2%	3.0%	2.07
Lights (At Stops with Shelters)	41.4%	51.1%	0.81	44.3%	40.0%	1.11

Based on this analysis, no potential for disparate impact to minority populations or disproportionate burden to low-income populations is identified for the distribution of shelters or lights. However, potential disparate impacts and disproportionate burdens are identified for the distribution of heaters. Additional analysis of this result is discussed below.

Figure 8. Bus Shelter Distribution

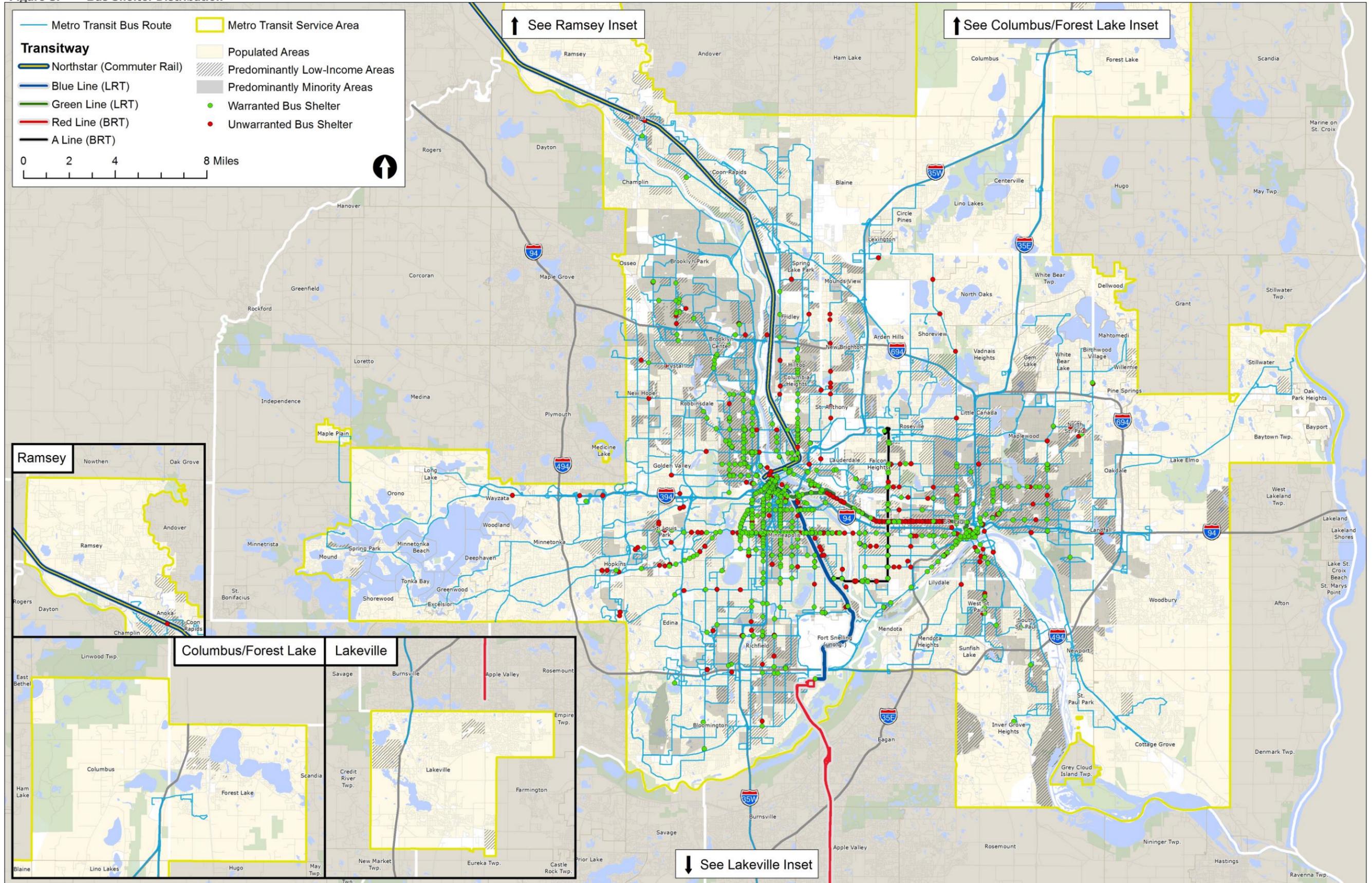
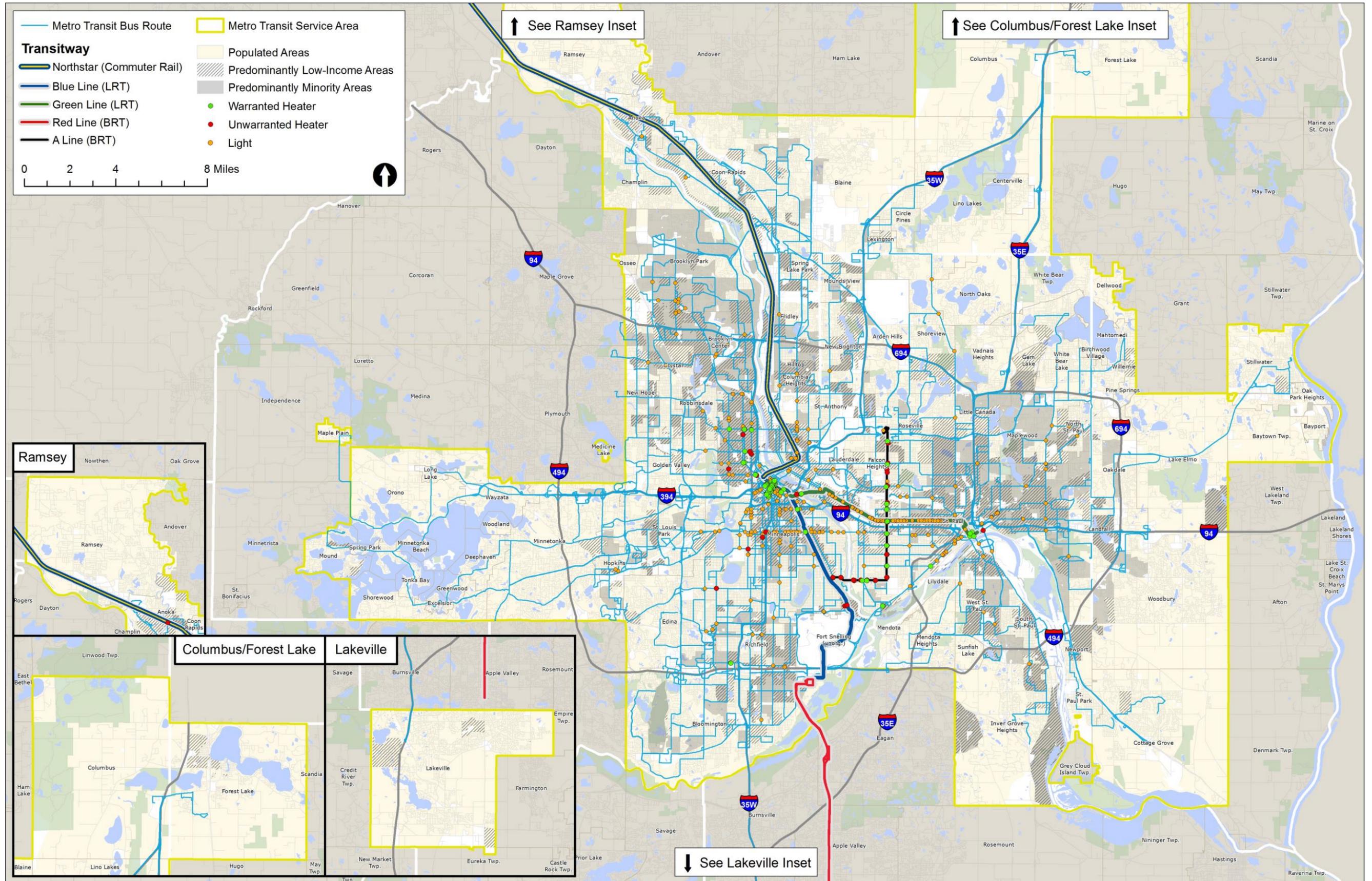


Figure 9. Bus Shelter Heater and Light Distribution



Additional Analysis of Heater Distribution

A further review of the distribution of shelters across Metro Transit’s system helps to highlight the causes of the results shown above. Table 19 below summarizes the heater distribution results, but also includes a breakdown according to the following categories:

- Bus stops on the downtown Minneapolis express route corridor on Marquette and 2nd Avenues (MARQ2)
- Bus stops served by BRT routes
- All other bus stops

The MARQ2 and BRT routes represent a significant investment in transit infrastructure for the region. Bus stops in each of these categories are held to a higher standard of transit service and transit amenities, including the implementation of shelters with heaters. Out of the 119 heaters distributed across the system, the bus stops along MARQ2 and the BRT routes account for 68 heaters (57 percent).

Table 19. Heater Distribution of Bus Stop Category

Bus Stop Category	Minority Stops	Non-Minority Stops	Comparison Index	Low-Income Stops	Non-Low-Income Stops	Comparison Index
Heaters (At Warranted Stops)	18.1%	54.7%	0.33	22.1%	54.0%	0.41
MARQ2 Stops	100%	92.0%	1.09	100%	92.9%	1.08
BRT Stops	n/a	100%	-	100%	n/a	-
All Other Stops	14.6%	8.6%	1.70	14.6%	4.5%	3.21
Heaters (At Unwarranted Stops)	2.9%	15.6%	0.18	6.2%	3.0%	2.07
MARQ2 Stops	n/a	n/a	-	n/a	n/a	-
BRT Stops	n/a	100%	-	100%	n/a	-
All Other Stops	2.9%	2.3%	1.27	2.7%	3.0%	0.90

When assessed independently, each of these categories results in comparison indices that meet the four-fifths threshold. However, in combination, the resulting comparison indices are substantially lower. This change in the result is partially due to the nature of the Title VI Circular requirements which require routes to be categorized entirely as either minority or non-minority, and as either low-income, or non-low-income. For example, despite the fact that they serve a variety of demographic areas, all of the BRT service stops are categorized as predominantly non-minority. This has a substantial impact on the final results. Current BRT service consists of two routes, the Red Line Highway BRT and the A Line Arterial BRT. C Line Arterial BRT is currently under construction and will open in 2019; three additional Arterial BRT corridors are currently being planned for implementation throughout the

system (the B, D, and E Lines). Nearly all these planned routes would be implemented in areas that are predominantly minority or predominantly low-income. It is anticipated that the implementation of these lines will help to address the findings of potential disparate impact and disproportionate burden noted in this assessment. Metro Transit will continue to monitor the impact of these additional routes and will also continue to monitor the implementation of heaters to ensure Title VI compliance.

Additionally, the MARQ2 corridor improvements completed in 2009 consolidated and improved service for many express bus routes entering and departing downtown Minneapolis. Because express routes are typically characterized as serving predominantly non-minority and non-low-income areas, nearly all the MARQ2 bus stops are categorized as such, contributing to the higher rates of distribution overall for heaters at non-minority and non-low-income bus stops. The MARQ2 corridor improvements were part of a major federal and state Urban Partnership Agreement including a series of transportation projects to improvement traffic conditions and reduce congestion on I-35W, Highway 77/Cedar Avenue, and downtown Minneapolis. The project has seen benefits in terms of service speed and quality and has also improved the reliability of service to connecting routes throughout the rest of the system.

Finally, the Nicollet Mall shelters, all of which include heat and light, were opened in early 2018. These stops are categorized as predominantly minority and predominantly low-income and will be included in the next Monitoring Study analysis.

Analysis: Customer Information

Metro Transit provides service information to its customers through a variety of means. The *2014 Guidelines for Transit Information at Bus Stops* outlines the type of customer information that should be provided at various tiers of bus stop type. These five tiers include low-boarding stops, medium/high boarding stops, stops with shelters, transitway stations and transit centers. The types of information media recommended for each tier is summarized in Table 20.

Metro Transit also provides customer information through the following channels:

- The Transit Information Center (TIC) fields over 1 million calls per year from transit customers.
- An automated interactive voice response (IVR) system is also available to provide scheduled and real-time transit information.
- Go-To Card customers can also receive information on the account's stored value amount and add funds to their card through the phone system.
- An online trip planner which is interfaced with real-time scheduling information allows customers to plan their trips using personal computers or online mobile devices. The system currently receives over 6.4 million trip queries per year.
- Pocket Schedule Distribution outlets are located throughout the region

Table 20. Bus Stop Transit Information Guidelines

Information Type	Tier 1	Tier 2	Tier 3	Tier 4	Tier 5
	Low-Boarding, Stand-Alone Bus Stops (<10 daily boardings)	Medium/High Boarding, Stand-Alone Bus Stops (≥ 10 daily boardings)	Bus Stops with Customer Waiting Shelters	Transitway Stations (BRT and LRT)	Transit Centers
Bus Stop Sign	✓	✓	✓	✓	✓
Route Numbers	✓	✓	✓	✓	✓
NexTrip Instructions	✓	✓	✓	✓	✓
Route Descriptions		✓	✓	✓	✓
Route Maps		✓	✓	✓	✓
Timetables		*	✓	✓	✓
Real-time Sign			**	✓	✓
Local Area Map				✓	
Fare poster					✓
System Map					✓

* Timetables will be considered at bus stops that meet the shelter placement boarding warrants but where a shelter is not installed due to space constraints or other limitations.

** Real-time signs will be considered at customer waiting shelters. The criteria for placement of real-time signs are still under development, but may include boardings, on-time performance, number of routes serving the shelter, Title VI considerations, and proximity to regional attractions.

Results: Customer Information

The locations of system maps, timetable displays, and pocket schedule distribution outlets are shown in Figure 10. The locations of bus stop information by tier as noted in Table 20 is shown in Figure 11. As of the publication of this report, Metro Transit has confirmed that customer information consistent with the above guidance has been fully implemented for all five tiers. This full implementation rate at all locations will result in comparison indices of 1.0 for both minority and low-income populations. **Based on this analysis, no potential for disparate impact to minority populations or disproportionate burden to low-income populations is identified under the customer information standard.**

Figure 10. Customer Information

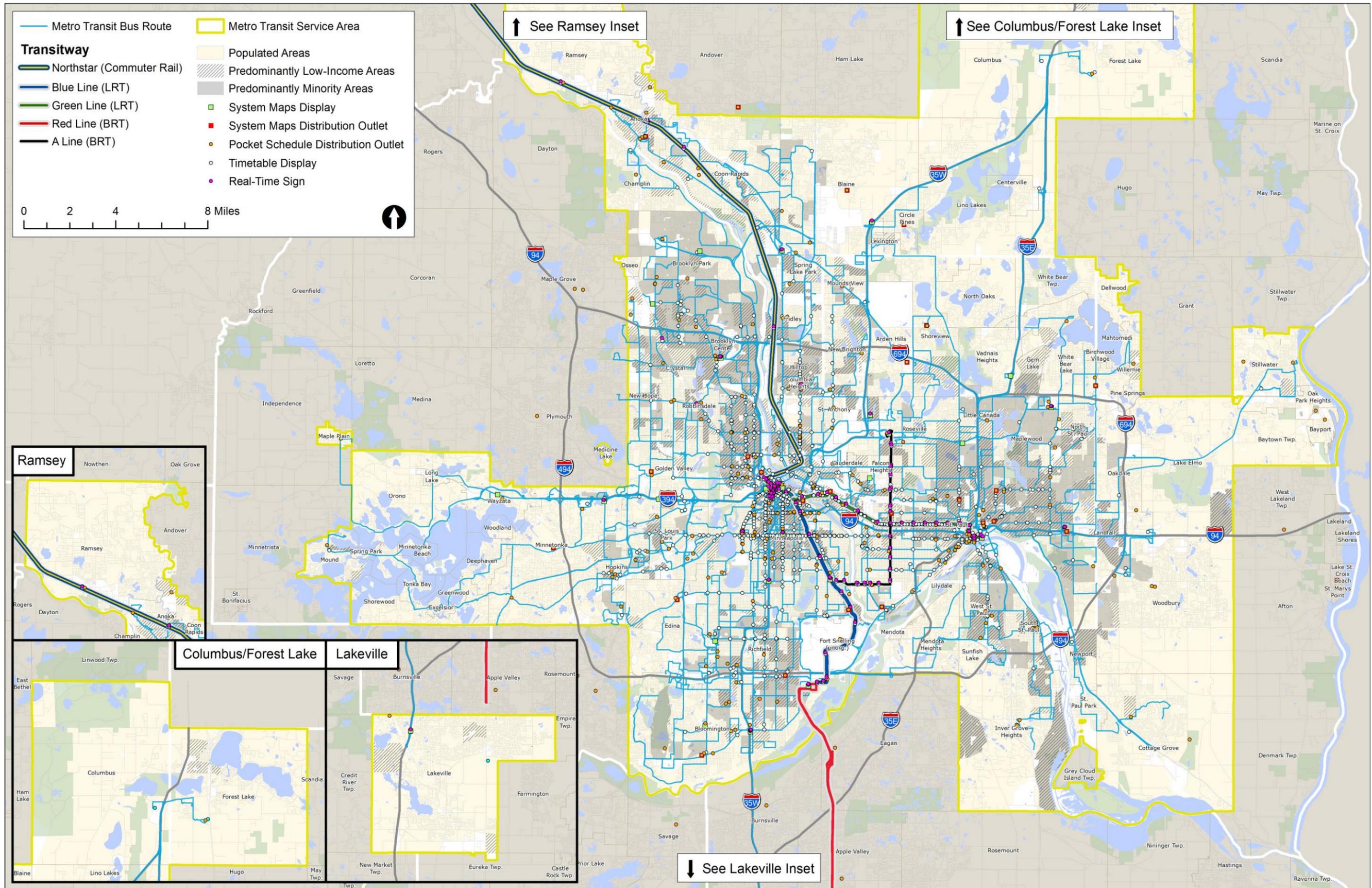
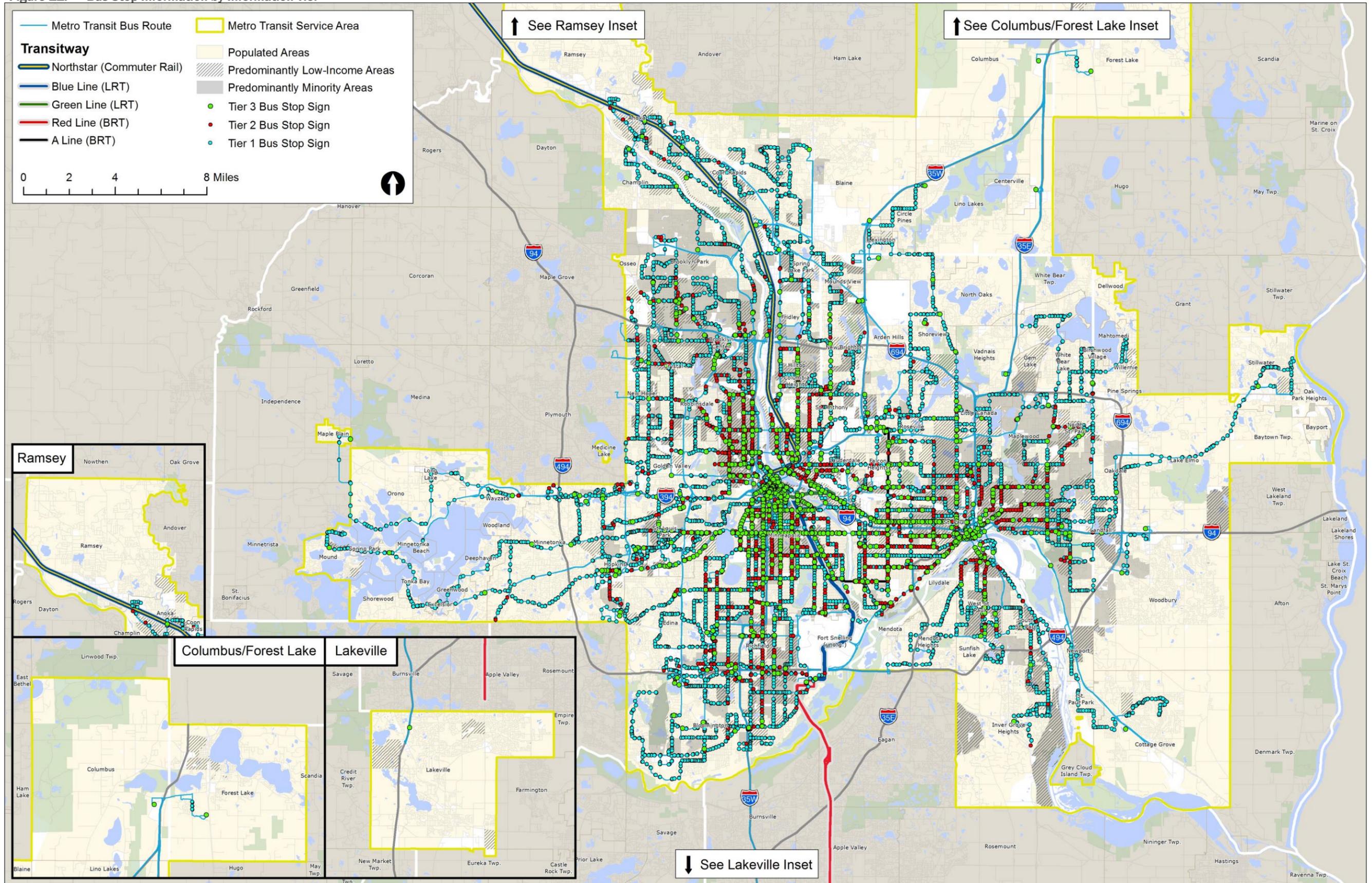


Figure 11. Bus Stop Information by Information Tier



Analysis: Transit Facilities

Metro Transit’s standards for transit facility amenities are summarized in the 2040 TPP. Potential amenities include lights, heaters, trash receptacles, stand-alone benches, security cameras, and electronic customer information displays. These amenities are designated as “always provided”, “occasionally provided”, or “never provided” for each facility type. Standards are also included for bus shelter amenities, but this category is reviewed under the Bus Shelter Distribution analysis in previous sections. The TPP standards assessed in this report are summarized in Table 21. Customer information as outlined in the previous section is also available at all transit facilities.

Table 21. TPP Standards for Transit Facility Amenities

Facility Type	Shelter	Light	Heat	Trash Receptacle	Standalone Bench
Transit Centers	Y	Y	Y	Y	Y
Park-and-rides	Y	Y	O	O	O
Rail Stations	Y	Y	Y	Y	Y

Y = Always Provided; O = Occasionally Provided; N = Not Provided

In accordance with the TPP, the analysis included only facilities under Metro Transit ownership. In cases where Metro Transit does not own the parcel but has a significant construction or maintenance investment in the property, the facility was also treated under Metro Transit ownership. Most of these cases are permanent facilities on MnDOT right-of-way but constructed and operated by Metro Transit. In many cases throughout the region, Metro Transit leases properties for transit use from private entities. In these cases, Metro Transit is not responsible for the facilities provided at these locations. The following exception to the evaluation of the TPP standards was used in this analysis:

- The TPP guidance refers to a requirement of standalone benches at many transit facilities. This analysis also reviews the inclusion of other types of benches, such as those integrated into transit shelters. Generally Metro Transit does not provide standalone benches at bus stops. Most bus benches are provided by a private company (US Bench) and are sited primarily for advertising purposes. For this analysis, any the presence of any bench at a facility was assumed to meet the Stand-Alone Bench requirement.

Results: Transit Facilities

The results of the evaluations for transit centers, park-and-rides, and transit stations are summarized in the sections below. The locations of these facilities in relation to Metro Transit’s service area are shown in Figure 12.

Transit Centers

A qualitative approach was used to evaluate the distribution of transit center amenities by comparing the locations of facilities meeting and not meeting the standards against areas of predominantly minority and predominantly low-income areas. Designating transit centers as predominantly minority or low-income is difficult since most transit centers provide service to populations from multiple routes from a broad geographical range.

A total of 18 transit centers were reviewed for amenity distribution. Of these, 16 meet all mandatory amenities required at these facilities. The two facilities that do not provide all of the required amenities are shown in Table 22. A full listing of Transit Center amenities is provided in Appendix C.

Table 22. Transit Centers Lacking Required Amenities

Transit Center	Shelter	Light	Heat	Trash Receptacle	Standalone Bench
Little Canada Transit Center	Yes	Yes	No	Yes	No
Plymouth Road Transit Center	Yes	Yes	Yes	Yes	No

In reviewing these facilities, it is important to note that both the Little Canada Transit Center and the Plymouth Road Transit Center have extremely low ridership levels compared to other transit centers. The provision of heaters is not warranted by the current ridership levels.

Based on this information and a qualitative examination of the locations of these facilities in Figure 12, no potential for disparate impact to minority populations or disproportionate burden to low-income populations is identified for the distribution of transit center amenities under the transit amenities (transit facilities) standard.

Park-and-Rides

A total of 60 standalone park-and-rides (not co-located with a transit center or transitway station) were reviewed for amenity distribution. Shelters and lighting are the only amenities listed in the standard as being “always provided”. The presence of heaters, trash receptacles and standalone benches are “occasionally provided” amenities based on the TPP standards (Table 21); each were reviewed for this analysis. The presence of any type of bench was assumed to satisfy the occasionally provided stand-alone bench standard.

Each park-and-ride was assigned a classification of minority or non-minority and low-income or non-low-income based on the results of the most recent license plate survey data from the *2016 Regional Park-and-ride System Report*. If the majority of vehicles at each facility originated from census areas exceeding the regional average for minority or low-income proportion, they were assigned to these categories. The proportion of park-and-rides in each

category meeting the amenity distribution guidelines is summarized and compared in Table 23. A full listing of park-and-ride amenities is provided in Appendix D.

Table 23. Park-and-Rides Amenity Distribution

Amenity	Minority Park-and-Rides	Non-Minority Park-and-Rides	Comparison Index	Low-Income Park-and-Rides	Non-Low-Income Park-and-Rides	Comparison Index
Shelter	75.0%	63.6%	1.18	60.0%	71.4%	0.84
Light	50.0%	47.7%	1.05	40.0%	54.3%	0.93
Heat	37.5%	31.8%	1.18	34.3%	32.0%	0.93
Trash Receptacle	37.5%	63.6%	0.59	40.0%	68.6%	0.58
Standalone Bench	56.3%	38.6%	1.46	52.0%	37.1%	1.40
All Amenities Available	18.8%	22.7%	0.83	20.0%	22.9%	0.88

With the exception of trash receptacles, the comparison indices for each amenity type show that the differences between the distribution of amenities at minority park-and-rides and non-minority park-and-rides are within the four-fifths threshold. Likewise, the differences between the distribution of amenities at low-income park-and-rides and non-low-income park-and-rides are within the four-fifths threshold. The distribution of trash receptacles at both minority and low-income park-and-rides is approximately 60 percent of the distribution rate at non-minority and non-low-income park-and-rides. Trash receptacles are considered an “occasionally provided” amenity and their placement is based on a case-by-case basis at each facility. Metro Transit will conduct a further review of trash receptacle placement to ensure that the distribution of these amenities complies with Title VI requirements.

Based on this information, no potential for disparate impact to minority populations or disproportionate burden to low-income populations is identified for the distribution of park-and-ride amenities under the transit amenities (transit facilities) standard.

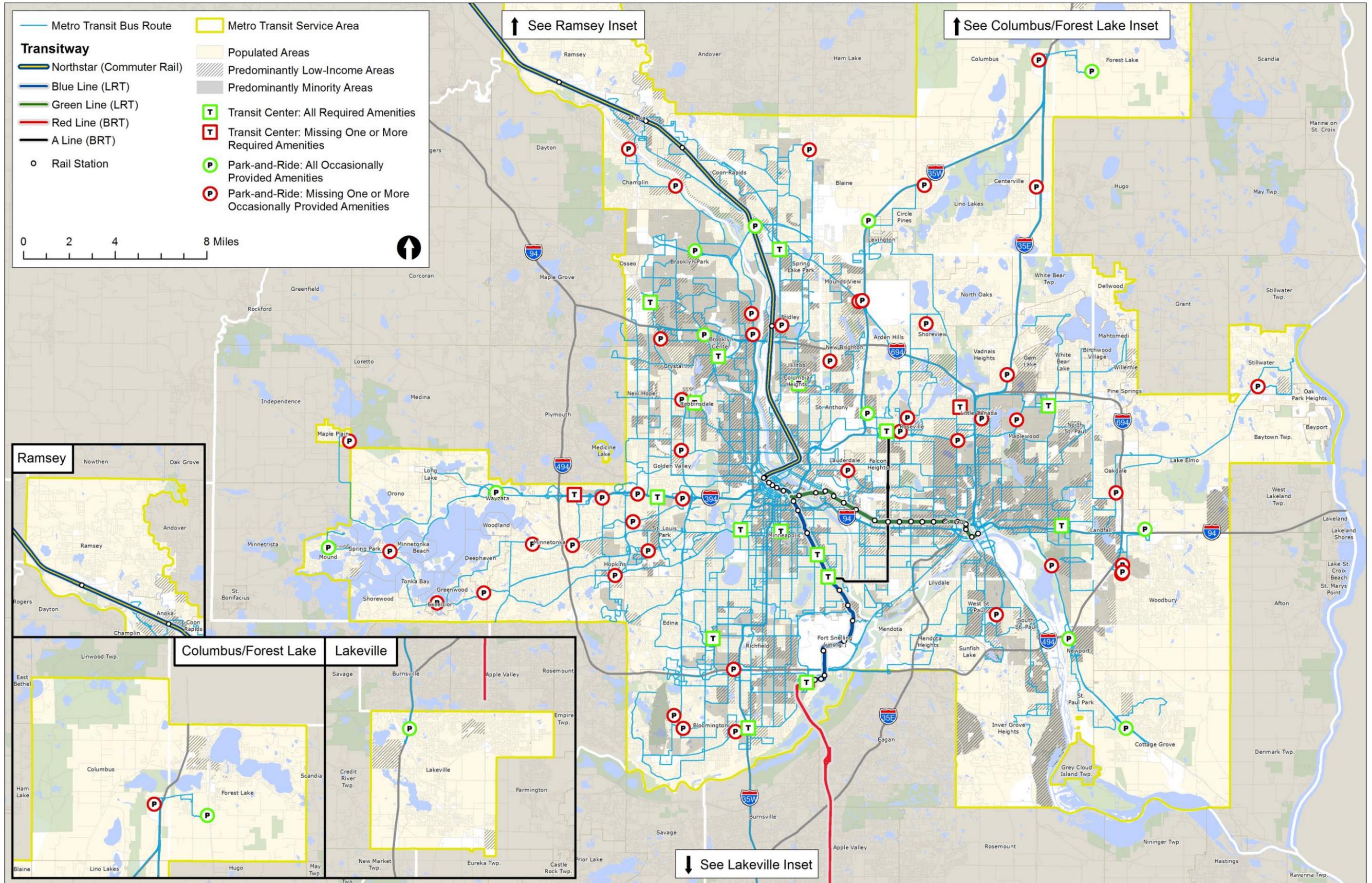
Transitway Stations

Transitway stations include the rail station facilities for the Northstar Commuter Rail and for the Green and Blue Line light rail systems. Bus transitway facilities include the Red Line BRT, the A Line BRT system, and the I-35W/46th Street Station facility. For the purposes of this analysis, the TPP standards for rail stations will be applied to all transitway stations.

All transitway stations in the Metro Transit service area comply with the six standards for amenities always provided at these types of facilities (lighting, heaters, trash, standalone bench, camera, and electronic customer information display). All transitway stations are also equipped with a shelter and/or a facility that provides shelter.

Based on this information, no potential for disparate impact to minority populations or disproportionate burden to low-income populations is identified for the distribution of transitway station amenities under the transit amenities (transit facilities) standard.

Figure 12. Transit Facility Amenities



Vehicle Assignment

The Title VI Circular states the following in regard to vehicle assignment standards:

Vehicle assignment refers to the process by which vehicles are placed into service in depots and on routes throughout the transit provider's system. Policies for vehicle assignment may be based on the age of the vehicle, where age would be a proxy for condition.

Vehicle assignment and other standards are summarized in the Metropolitan Council's *Fleet Management Procedures*, updated in 2012. These procedures are designed to facilitate compliance with FTA and Title VI standards, assure that vehicles purchased meet minimum standards, and create efficiencies and improve flexibility in the deployment/reassignment of vehicles to the extent feasible.

Metro Transit/Metropolitan Council Fleet

Metro Transit has five bus garages, along with two light rail and one commuter rail depots. Many routes are operated out of multiple garages and not necessarily designed to serve a specific area. In addition, the Metropolitan Council Metropolitan Transportation Services (MTS) contracts out 28 routes. As of fall 2017, there were two contractors using four separate garage locations. In all cases, the Metropolitan Council owns the buses and leases them to the operating contractor under a master vehicle lease.

A total of 941² Metro Transit buses, 86 MTS buses, and seven BRT buses were used to provide fixed route services in the fall of 2017. A summary of this fleet is provided in Table 24.

Table 24. Metro Transit/Metropolitan Council Fleet Summary

Bus Type	Bus Count	Model Years
40'	564	2003, 2004, 2006, 2008, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017
40' Hybrid	128	2007, 2008, 2010, 2012
Articulated	203	2003, 2004, 2006, 2007, 2008, 2009, 2010, 2012
Coach	45	2009, 2012, 2013, 2014, 2015
BRT	20	2013, 2015, 2016, 2017
30'	45	2009, 2011, 2014, 2016
Small Bus	29	2012, 2013, 2015
Total	1,034	

² The size of the Metro Transit active fleet at any given time during this period was 873 buses. However, because of bus retirements and replacements, the total number of buses that provided service during this period was 941.

All 30-foot, 40-foot, and articulated buses have a 12-year life span. Commuter coach buses are replaced every 14 years; small cutaway buses have a life span of 5-7 years.

Guidelines for Assigning Vehicle to Garages

Metro Transit's Bus Maintenance department has developed guidelines for assigning vehicles to garages. When service needs require adjustment of the fleet between one service garage and another, or when new vehicles are added to the fleet, the following items need to be considered:

1. Garage capacity and characteristics
2. Spare factor
3. Vehicle Type: 40-foot or Articulated, based on ridership as assigned by Service Development
4. Average fleet age: a fair and balanced average fleet age will be maintained throughout all garages. This ensures knowledge of new technology will be broadly distributed to all mechanics and helps keep both Operators and Mechanics system-wide sharing the benefits of new equipment.
5. Sub-fleets: a particular vehicle design or configuration should be kept together whenever possible
6. Stability: a bus is kept at the same garage its entire service life if possible to provide ownership and accountability to the garage.
7. Sequential numbers: sequentially numbered groups of buses are kept together whenever possible to ease administrative tracking

Contractor Fleet Management

MTS assigns vehicles to a specific contractor garage as part of the contract; those buses normally do not transfer to another contractor during the life of the contract. If a new contractor is awarded a service contract, the buses follow the service. Buses are moved from one contract to another only occasionally as routes are added or terminated, vehicle issues arise, etc.

The contractor may assign any bus to any route as long as it is the correct size and type of bus. As a matter of practice, contractors prefer to assign the same vehicle to the same operator on a regular basis to track vehicle maintenance and condition concerns. However, because not all buses are equipped with APCs, MTS stipulates within the operating contract that vehicles must be rotated among operators and work pieces to ensure APC coverage throughout the service.

Specific Vehicle Assignment Policies

In select situations, a specific bus type or size is assigned to a route or geographic area.

Commuter Coach Buses

Coach buses may be used on express trips carrying riders on a one-way trip length of 15 miles or longer and duration of more than 30 minutes. Although coach buses are lift-equipped, an effort is made to not use them on trips with regular wheelchair users due to the narrow aisle configuration and length of time it takes to deploy the lift. The Service Analysis group assigns coach buses to specific blocks based on ridership patterns and trip distance. Currently coach buses are used on some trips on Routes 275, 288, 294, 351, 355, 365, 375, 467, 860, and 865.

Hybrid Buses

Through agreement with the City of Minneapolis, all routes operating on Nicollet Mall in downtown Minneapolis must use hybrid buses. This includes Routes 10, 11, 17, 18, 25, and 59. Hybrid buses are also assigned to Routes 63, 64, and 68 operating in St. Paul.

Articulated Buses

Metro Transit uses articulated buses on either local or express routes. Service Analysis assigns articulated buses to specific blocks based on ridership patterns and maximum loads. Assignments are reviewed at least once each quarter. Articulated buses are used primarily on express routes during the peak period. Articulated buses are used on local routes with heavy ridership during off-peak times.

Small Buses

Buses that are 30 feet or smaller are sometimes used by contractors to provide service on lower-ridership suburban local routes.

BRT Buses

Bus Rapid Transit buses are specially marked buses that help brand BRT routes. They are used exclusively on the A Line and Red Line. A Line buses have no farebox; both A and Red Line buses have fewer seats to allow for better passenger circulation.

Analysis

This monitoring is intended to evaluate the quality of service (in this case, vehicle quality) provided to customers. This evaluation used bus age as a general indicator of the quality of the riding experience. It compares the average age of vehicles assigned to minority or low-income route trips to the average age of vehicles assigned to non-minority or non-low-income route trips.

To generate a report of the average age of buses by route, it was first necessary to determine what vehicle type was assigned to each weekday trip during the fall of 2017. This information was generated primarily using automatic vehicle locator (AVL) data. If AVL data was not available for a trip, secondary sources were used, including farebox data and dispatcher-recorded assignments. In cases where more than one vehicle was used to operate a trip³, the age of the first vehicle assigned was used.

An analysis of LRT and Commuter Rail vehicles was not included due to the limited availability of data on the age of assigned vehicles. Metro Transit's Blue Line fleet consists primarily of light rail vehicles (LRVs) purchased in 2004 and 2007. Metro Transit's Green Line fleet consists primarily of LRVs purchased in 2012. However, in some cases, year 2012 vehicles are assigned to Blue Line service when they are not need on the Green Line. Metro Transit's commuter rail fleet consists of vehicles purchased in 2009.

Results

The average age of vehicles assigned to Metro Transit and Metropolitan Council routes was 5.4 years. It should be noted that this value is less than average age of vehicles in the fleet. Newer buses tend to be more reliable and as a result are more frequently available to be assigned to trips. During the evaluation period, Metro Transit was also in the process of retiring old buses. The average fleet age was calculated based on the ages of all buses in service at any time during a three-month period. In actuality, the average age of the fleet dropped steadily over this period. A route-by-route summary of vehicle assignment results is provided in Appendix E.

³ This will occur in cases where a garage sends out a double-header (two buses operate the same trip in tandem) or when a second bus replaces the original bus midway through the trip due to mechanical issues.

Table 25 summarizes the average age of assigned vehicles by mode for minority routes, non-minority routes, low-income routes, and non-low-income routes.

- The average age of buses assigned to minority routes is 5.56 years, more than the average of 5.06 years for non-minority routes, but the resulting comparison index of 0.91 is within the four-fifths threshold.
- The average age of buses assigned low-income routes was 5.35 years, less than the average of 5.46 years for non-low-income routes.

These results indicate that the quality of buses assigned to minority and low-income routes is approximately equal to the quality of buses assigned to non-minority and non-low-income routes.

Table 25. Average Age of Assigned Vehicles (Years)

Analysis	Minority Routes	Non-Minority Routes	Comparison Index	Low-Income Routes	Non-Low-Income Routes	Comparison index
Bus	5.56	5.06	0.91	5.35	5.46	1.02

Based on this analysis, no potential for disparate impact to minority populations or disproportionate burden to low-income populations is identified for the vehicle assignment standard.

Summary of Results and Conclusion

A summary of the results of each evaluation is shown in Table 26. The potential for disparate impacts to minority populations and disproportionate burdens to low-income populations was identified in two categories: Transit Amenities, Bus Shelter Amenities, and Transit Amenities, Customer information. The specific amenities in question are the distribution of heaters at stops with shelters and the distribution of customer information at Tier 2 bus stops. Additional discussion of the potential causes of these results and the steps Metro Transit will undertake are discussed in detail in the Transit Amenities section.

Table 26. Summary of Results

Standard/Policy	Minority Results	Low-Income Results
Vehicle Load	No Disparate Impacts	No Disproportionate Burdens
Vehicle Headway	No Disparate Impacts	No Disproportionate Burdens
On-Time Performance	No Disparate Impacts	No Disproportionate Burdens
Service Availability	-	-
Route Spacing	No Disparate Impacts	No Disproportionate Burdens
Midday Service Availability	No Disparate Impacts	No Disproportionate Burdens
Stop/Station Spacing	No Disparate Impacts	No Disproportionate Burdens
Transit Amenities	-	-
Bus Shelter Amenities	Potential Disparate Impacts Identified	Potential Disproportionate Burdens Identified
Customer Information	No Disparate Impacts	No Disproportionate Burdens
Transit Facilities	No Disparate Impacts	No Disproportionate Burdens
Vehicle Assignment	No Disparate Impacts	No Disproportionate Burdens

* Amenities reviewed include shelter distribution and the availability of heat and light in shelters. The availability of heat at shelters was the only area showing potential impacts.

The purpose of this document is to evaluate Metro Transit's compliance with Title VI Requirements as they apply to the implementation of the agency's service standards and policies. The review found that nearly all of Metro Transit's standards and policies are implemented fairly and equitably with no potential for disparate impacts to minority populations or disproportionate burdens to low-income populations. As noted above, some minor issues were identified for individual standards or policies. However, explanations for these results and steps Metro Transit can take to improve the results are provided in each of these instances. This analysis satisfies the FTA's Title VI Requirements to monitor transit system performance relative to system-wide service standards and policies.

APPENDIX A: MINORITY/LOW-INCOME DESIGNATION

Table A: Minority and Low-Income Route Designations

Route	Percent Minority Coverage Area	Predominantly Minority Route	Percent Low-Income Coverage Area	Predominantly Low-Income Route	Type
2	50.2%	Y	82.2%	Y	Core Local
3	60.6%	Y	81.3%	Y	Core Local
4	25.4%	N	41.0%	Y	Core Local
5	77.8%	Y	69.7%	Y	Core Local
6	16.9%	N	24.5%	N	Core Local
7	50.1%	Y	55.3%	Y	Core Local
9	28.8%	N	37.8%	Y	Core Local
10	60.5%	Y	61.9%	Y	Core Local
11	69.7%	Y	68.5%	Y	Core Local
12	25.4%	N	29.1%	N	Core Local
14	59.7%	Y	51.4%	Y	Core Local
16	74.6%	Y	91.7%	Y	Core Local
17	36.0%	Y	44.8%	Y	Core Local
18	53.5%	Y	56.2%	Y	Core Local
19	93.5%	Y	84.5%	Y	Core Local
20	71.0%	N	98.8%	N	Supporting Local
21	55.3%	Y	60.7%	Y	Core Local
22	74.1%	Y	56.1%	Y	Core Local
23	30.4%	N	23.4%	N	Supporting Local
25	17.8%	N	27.4%	N	Core Local
27	100.0%	Y	84.8%	Y	Supporting Local
30	67.4%	Y	74.8%	Y	Supporting Local
32	56.1%	Y	75.1%	Y	Supporting Local
39	93.1%	Y	100.0%	Y	Supporting Local
46	11.8%	N	10.3%	N	Supporting Local
53	50.3%	Y	63.1%	Y	Supporting Local
54	18.2%	N	36.2%	Y	Core Local
59	53.3%	Y	51.1%	Y	Core Local
61	53.9%	Y	59.9%	Y	Core Local
62	57.7%	Y	53.3%	Y	Core Local
63	48.8%	Y	53.6%	Y	Core Local
64	75.5%	Y	69.7%	Y	Core Local
65	49.5%	Y	60.7%	Y	Supporting Local
67	60.1%	Y	65.4%	Y	Core Local
68	57.0%	Y	53.5%	Y	Core Local
70	40.4%	Y	36.5%	Y	Core Local
71	68.7%	Y	59.8%	Y	Core Local
74	45.2%	Y	51.4%	Y	Core Local
75	58.2%	Y	52.8%	Y	Core Local
80	74.3%	Y	54.9%	Y	Supporting Local
83	21.1%	N	19.6%	N	Supporting Local
84	26.0%	N	38.7%	Y	Core Local
87	23.6%	N	50.0%	Y	Supporting Local

Route	Percent Minority Coverage Area	Predominantly Minority Route	Percent Low-Income Coverage Area	Predominantly Low-Income Route	Type
94	59.3%	Y	83.7%	Y	Commuter Express
111	46.5%	Y	36.8%	Y	Commuter Express
113	17.5%	N	34.1%	Y	Commuter Express
114	5.5%	N	34.8%	Y	Commuter Express
115	6.7%	N	22.8%	N	Commuter Express
118	36.9%	Y	56.3%	Y	Commuter Express
129	56.1%	N	96.5%	N	Supporting Local
133	40.5%	Y	31.3%	N	Commuter Express
134	16.2%	N	39.2%	Y	Commuter Express
135	30.6%	N	31.6%	N	Commuter Express
141	34.6%	Y	53.4%	Y	Core Local
146	8.5%	N	15.9%	N	Commuter Express
156	30.6%	N	20.8%	N	Commuter Express
219	33.4%	Y	26.5%	N	Suburban Local
223	37.9%	Y	23.0%	N	Suburban Local
225	3.6%	N	27.6%	N	Suburban Local
227	9.5%	N	23.9%	N	Suburban Local
250	10.4%	N	9.6%	N	Commuter Express
252	5.1%	N	3.5%	N	Commuter Express
261	17.0%	N	21.8%	N	Commuter Express
262	17.5%	N	24.2%	N	Core Local
263	44.3%	Y	40.7%	Y	Commuter Express
264	26.4%	N	27.0%	N	Commuter Express
265	24.9%	N	12.2%	N	Commuter Express
270	30.5%	N	21.7%	N	Commuter Express
272	29.0%	N	21.0%	N	Commuter Express
275	0.9%	N	4.6%	N	Commuter Express
288	2.6%	N	8.8%	N	Commuter Express
294	7.5%	N	7.1%	N	Commuter Express
350	55.4%	Y	15.6%	N	Commuter Express
351	15.8%	N	5.6%	N	Commuter Express
353	13.4%	N	4.4%	N	Commuter Express
355	13.4%	N	4.4%	N	Commuter Express
361	15.7%	N	11.8%	N	Commuter Express
364	21.4%	N	23.1%	N	Commuter Express
365	15.8%	N	10.6%	N	Commuter Express
375	17.4%	N	11.1%	N	Commuter Express
415	4.9%	N	4.9%	N	Suburban Local
417	1.6%	N	3.6%	N	Suburban Local
452	54.2%	Y	40.4%	Y	Commuter Express
467	4.8%	N	8.7%	N	Commuter Express
515	60.5%	Y	39.9%	Y	Suburban Local
535	34.8%	Y	38.6%	Y	Commuter Express
537	27.1%	N	15.8%	N	Suburban Local
538	63.0%	Y	33.6%	Y	Suburban Local
539	25.1%	N	28.0%	N	Suburban Local

Route	Percent Minority Coverage Area	Predominantly Minority Route	Percent Low-Income Coverage Area	Predominantly Low-Income Route	Type
540	66.8%	Y	42.6%	Y	Suburban Local
542	44.7%	Y	39.8%	Y	Suburban Local
552	56.1%	Y	45.2%	Y	Commuter Express
553	50.7%	Y	37.4%	Y	Commuter Express
554	42.6%	Y	49.0%	Y	Commuter Express
558	39.0%	Y	21.2%	N	Commuter Express
578	33.1%	Y	20.0%	N	Commuter Express
579	39.5%	Y	38.1%	Y	Commuter Express
587	26.2%	N	18.3%	N	Commuter Express
588	45.6%	Y	50.4%	Y	Commuter Express
589	21.9%	N	5.7%	N	Commuter Express
597	19.6%	N	11.7%	N	Commuter Express
604	23.3%	N	22.2%	N	Suburban Local
612	24.1%	N	27.8%	N	Suburban Local
614	0.0%	N	0.2%	N	Suburban Local
615	23.5%	N	15.9%	N	Suburban Local
643	20.1%	N	23.2%	N	Commuter Express
645	16.6%	N	9.1%	N	Suburban Local
652	14.9%	N	11.3%	N	Commuter Express
663	20.0%	N	18.4%	N	Commuter Express
664	46.3%	Y	34.8%	Y	Commuter Express
667	24.9%	N	22.7%	N	Commuter Express
668	40.2%	Y	33.7%	Y	Commuter Express
670	11.4%	N	11.3%	N	Commuter Express
671	4.9%	N	5.8%	N	Commuter Express
672	17.3%	N	14.0%	N	Commuter Express
673	8.8%	N	7.7%	N	Commuter Express
674	1.8%	N	11.1%	N	Commuter Express
677	11.5%	N	12.6%	N	Commuter Express
679	20.4%	N	13.8%	N	Commuter Express
705	39.1%	Y	27.9%	N	Suburban Local
716	63.5%	Y	46.0%	Y	Suburban Local
717	41.1%	Y	20.3%	N	Suburban Local
721	59.7%	Y	73.0%	Y	Suburban Local
722	97.1%	Y	31.6%	N	Suburban Local
723	100.0%	Y	37.5%	Y	Suburban Local
724	98.1%	Y	54.3%	Y	Suburban Local
755	34.8%	Y	26.7%	N	Commuter Express
756	25.0%	N	19.1%	N	Commuter Express
758	23.1%	N	26.0%	N	Commuter Express
760	90.7%	Y	46.5%	Y	Commuter Express
761	97.3%	Y	50.1%	Y	Commuter Express
762	94.4%	Y	70.2%	Y	Commuter Express
763	85.1%	Y	29.1%	N	Commuter Express
764	49.3%	Y	38.4%	Y	Commuter Express
765	90.3%	Y	44.4%	Y	Commuter Express

Route	Percent Minority Coverage Area	Predominantly Minority Route	Percent Low-Income Coverage Area	Predominantly Low-Income Route	Type
766	38.6%	Y	16.8%	N	Commuter Express
767	69.8%	Y	53.1%	Y	Commuter Express
768	54.6%	Y	12.3%	N	Commuter Express
801	69.5%	Y	59.9%	Y	Suburban Local
805	21.5%	N	35.8%	Y	Suburban Local
812	94.9%	Y	46.7%	Y	Suburban Local
813	77.5%	Y	61.1%	Y	Suburban Local
814	100.0%	Y	72.5%	Y	Suburban Local
815	76.6%	Y	56.8%	Y	Suburban Local
824	59.6%	Y	43.7%	Y	Core Local
825	19.5%	N	26.2%	N	Core Local
831	15.2%	N	15.4%	N	Suburban Local
850	7.1%	N	18.3%	N	Commuter Express
852	19.8%	N	37.3%	Y	Commuter Express
854	29.5%	N	25.8%	N	Commuter Express
860	13.5%	N	18.1%	N	Commuter Express
865	12.8%	N	5.7%	N	Commuter Express
Northstar	6.6%	N	9.9%	N	Commuter Rail
Green Line	56.0%	Y	55.0%	Y	LRT
Blue Line	68.2%	Y	84.1%	Y	LRT
Red Line	13.2%	N	15.7%	N	Highway BRT
A Line	17.0%	N	33.9%	Y	Arterial BRT

Route Type Definitions

Core Local Bus: Core Local routes typically serve the denser urban areas of Market Areas I and II, usually providing access to a downtown or major activity center along important commercial corridors. They form the base of the core bus network and are typically some of the most productive routes in the system.

Supporting Local Bus: Supporting Local routes are typically designed to provide crosstown connections within Market Areas I and II. Typically, these routes do not serve a downtown but play an important role connecting to Core Local routes and ensuring transit access for those not traveling downtown.

Suburban Local Bus: Suburban Local routes typically operate in Market Areas II and III in a suburban context and are often less productive than Core Local routes. These routes serve an important role in providing a basic-level of transit coverage throughout the region.

Commuter and Express Bus: Commuter and Express Bus routes primarily operate during peak periods to serve commuters to downtown or a major employment center. These routes typically operate non-stop on highways for portions of the route between picking up passengers in residential areas or at park-and-ride facilities and dropping them off at a major destination.

Arterial Bus Rapid Transit (BRT): Arterial bus rapid transit (BRT) lines operate in high demand urban arterial corridors with service, facility, and technology improvements that enable faster travel speeds, greater frequency, an improved passenger experience, and better reliability. Design guidelines for arterial BRT can be found in the Regional Transitway Guidelines.

Highway Bus Rapid Transit (BRT): Highway bus rapid transit (BRT) lines operate in high demand highway corridors with service, facility, and technology improvements providing faster travel speeds, all-day service, greater frequency, an improved passenger experience, and better reliability. Design guidelines for highway BRT can be found in the Regional Transitway Guidelines.

Light Rail (LRT): Light rail operates using electrically-powered passenger rail cars operating on fixed rails in dedicated right-of-way. It provides frequent, all-day service stopping at stations with high levels of customer amenities and waiting facilities. Design guidelines for light rail can be found in the Regional Transitway Guidelines.

Commuter Rail: Commuter rail operates using diesel-power locomotives and passenger coaches on traditional railroad track. These trains typically only operate during the morning and evening peak period to serve work commuters. Design guidelines for commuter rail can be found in the Regional Transitway Guidelines

APPENDIX B: ON-TIME PERFORMANCE BY ROUTE

Table B: On-Time Performance by Route

Route	Predominantly Minority Route	Predominantly Low-Income Route	Type	Percent On-Time
2	Y	Y	Core Local	83.4%
3	Y	Y	Core Local	84.4%
4	N	Y	Core Local	81.9%
5	Y	Y	Core Local	77.3%
6	N	N	Core Local	80.9%
7	Y	Y	Core Local	84.2%
9	N	Y	Core Local	81.0%
10	Y	Y	Core Local	77.8%
11	Y	Y	Core Local	87.4%
12	N	N	Core Local	77.6%
14	Y	Y	Core Local	80.7%
16	Y	Y	Core Local	90.2%
17	Y	Y	Core Local	83.9%
18	Y	Y	Core Local	85.1%
19	Y	Y	Core Local	81.6%
20	N	N	Supporting Local	96.0%
21	Y	Y	Core Local	84.2%
22	Y	Y	Core Local	75.0%
23	N	N	Supporting Local	81.4%
25	N	N	Core Local	79.2%
27	Y	Y	Supporting Local	79.0%
30	Y	Y	Supporting Local	83.3%
32	Y	Y	Supporting Local	66.8%
39	Y	Y	Supporting Local	87.0%
46	N	N	Supporting Local	85.5%
53	Y	Y	Supporting Local	82.2%
54	N	Y	Core Local	83.9%
59	Y	Y	Core Local	73.3%
61	Y	Y	Core Local	88.5%
62	Y	Y	Core Local	93.3%

Route	Predominantly Minority Route	Predominantly Low-Income Route	Type	Percent On-Time
63	Y	Y	Core Local	86.3%
64	Y	Y	Core Local	89.8%
65	Y	Y	Supporting Local	94.2%
67	Y	Y	Core Local	89.4%
68	Y	Y	Core Local	91.8%
70	Y	Y	Core Local	91.7%
71	Y	Y	Core Local	92.0%
74	Y	Y	Core Local	87.4%
75	Y	Y	Core Local	91.9%
80	Y	Y	Supporting Local	94.4%
83	N	N	Supporting Local	83.6%
84	N	Y	Core Local	93.1%
87	N	Y	Supporting Local	90.5%
94	Y	Y	Commuter Express	92.1%
111	Y	Y	Commuter Express	61.5%
113	N	Y	Commuter Express	72.8%
114	N	Y	Commuter Express	79.5%
115	N	N	Commuter Express	68.1%
118	Y	Y	Commuter Express	88.1%
129	N	N	Supporting Local	98.4%
133	Y	N	Commuter Express	70.4%
134	N	Y	Commuter Express	78.9%
135	N	N	Commuter Express	68.3%
141	Y	Y	Core Local	87.0%
146	N	N	Commuter Express	65.9%
156	N	N	Commuter Express	75.1%
219	Y	N	Suburban Local	84.5%
223	Y	N	Suburban Local	93.8%
225	N	N	Suburban Local	87.6%
227	N	N	Suburban Local	91.8%
250	N	N	Commuter Express	84.8%
252	N	N	Commuter Express	82.1%
261	N	N	Commuter Express	85.0%

Route	Predominantly Minority Route	Predominantly Low-Income Route	Type	Percent On-Time
262	N	N	Core Local	85.5%
263	Y	Y	Commuter Express	94.2%
264	N	N	Commuter Express	91.1%
265	N	N	Commuter Express	93.4%
270	N	N	Commuter Express	86.9%
272	N	N	Commuter Express	73.4%
275	N	N	Commuter Express	97.5%
288	N	N	Commuter Express	87.0%
294	N	N	Commuter Express	83.4%
350	Y	N	Commuter Express	78.1%
351	N	N	Commuter Express	90.5%
353	N	N	Commuter Express	100.0%
355	N	N	Commuter Express	84.6%
361	N	N	Commuter Express	88.6%
364	N	N	Commuter Express	71.4%
365	N	N	Commuter Express	84.8%
375	N	N	Commuter Express	92.8%
415	N	N	Suburban Local	85.2%
417	N	N	Suburban Local	65.6%
452	Y	Y	Commuter Express	83.2%
467	N	N	Commuter Express	85.8%
515	Y	Y	Suburban Local	90.8%
535	Y	Y	Commuter Express	82.1%
537	N	N	Suburban Local	98.1%
538	Y	Y	Suburban Local	86.8%
539	N	N	Suburban Local	81.9%
540	Y	Y	Suburban Local	84.6%
542	Y	Y	Suburban Local	81.6%
552	Y	Y	Commuter Express	69.8%
553	Y	Y	Commuter Express	74.6%
554	Y	Y	Commuter Express	62.3%
558	Y	N	Commuter Express	71.5%
578	Y	N	Commuter Express	75.8%

Route	Predominantly Minority Route	Predominantly Low-Income Route	Type	Percent On-Time
579	Y	Y	Commuter Express	76.9%
587	N	N	Commuter Express	78.8%
588	Y	Y	Commuter Express	85.5%
589	N	N	Commuter Express	77.0%
597	N	N	Commuter Express	70.1%
604	N	N	Suburban Local	92.0%
612	N	N	Suburban Local	86.1%
614	N	N	Suburban Local	96.2%
615	N	N	Suburban Local	87.4%
643	N	N	Commuter Express	81.0%
645	N	N	Suburban Local	80.1%
652	N	N	Commuter Express	86.8%
663	N	N	Commuter Express	79.8%
664	Y	Y	Commuter Express	79.0%
667	N	N	Commuter Express	82.6%
668	Y	Y	Commuter Express	84.8%
670	N	N	Commuter Express	69.6%
671	N	N	Commuter Express	72.1%
672	N	N	Commuter Express	87.5%
673	N	N	Commuter Express	81.8%
674	N	N	Commuter Express	75.3%
677	N	N	Commuter Express	72.9%
679	N	N	Commuter Express	79.4%
705	Y	N	Suburban Local	86.5%
716	Y	Y	Suburban Local	89.0%
717	Y	N	Suburban Local	80.7%
721	Y	Y	Suburban Local	86.0%
722	Y	N	Suburban Local	94.0%
723	Y	Y	Suburban Local	93.1%
724	Y	Y	Suburban Local	89.1%
755	Y	N	Commuter Express	65.5%
756	N	N	Commuter Express	71.3%
758	N	N	Commuter Express	82.8%

Route	Predominantly Minority Route	Predominantly Low-Income Route	Type	Percent On-Time
760	Y	Y	Commuter Express	77.8%
761	Y	Y	Commuter Express	86.3%
762	Y	Y	Commuter Express	85.1%
763	Y	N	Commuter Express	79.4%
764	Y	Y	Commuter Express	71.5%
765	Y	Y	Commuter Express	82.9%
766	Y	N	Commuter Express	78.3%
767	Y	Y	Commuter Express	88.2%
768	Y	N	Commuter Express	86.7%
801	Y	Y	Suburban Local	82.9%
805	N	Y	Suburban Local	68.2%
812	Y	Y	Suburban Local	n/a
813	Y	Y	Suburban Local	n/a
814	Y	Y	Suburban Local	n/a
815	Y	Y	Suburban Local	n/a
824	Y	Y	Core Local	81.0%
825	N	N	Core Local	81.0%
831	N	N	Suburban Local	96.9%
850	N	N	Commuter Express	80.6%
852	N	Y	Commuter Express	82.1%
854	N	N	Commuter Express	80.8%
860	N	N	Commuter Express	77.6%
865	N	N	Commuter Express	86.2%
Northstar	N	N	Commuter Rail	88.5%
Green Line	Y	Y	LRT	76.7%
Blue Line	Y	Y	LRT	83.9%
Red Line	N	N	Highway BRT	88.8%
A Line	N	Y	Arterial BRT	93.8%

APPENDIX C: TRANSIT CENTER FACILITY AMENITIES

Table C: Transit Center Amenities

Transit Center	Shelter	Lights	Heater	Trash Receptacle	Bench
Columbia Heights Transit Center	Yes	Yes	Yes	Yes	Yes
Brooklyn Center Transit Center	Yes	Yes	Yes	Yes	Yes
Sun Ray Transit Center	Yes	Yes	Yes	Yes	Yes
Uptown Transit Center	Yes	Yes	Yes	Yes	Yes
Robbinsdale Transit Center	Yes	Yes	Yes	Yes	Yes
38th St Transit Center	Yes	Yes	Yes	Yes	Yes
46th St Transit Center	Yes	Yes	Yes	Yes	Yes
Little Canada Transit Center	Yes	Yes	No	Yes	No
Chicago Lake Transit Center	Yes	Yes	Yes	Yes	Yes
Starlite Transit Center	Yes	Yes	Yes	Yes	Yes
Maplewood Mall Transit Center	Yes	Yes	Yes	Yes	Yes
Rosedale Transit Center	Yes	Yes	Yes	Yes	Yes
Northtown Transit Center	Yes	Yes	Yes	Yes	Yes
Louisiana Transit Center	Yes	Yes	Yes	Yes	Yes
Plymouth Rd Transit Center	Yes	Yes	Yes	Yes	No
Southdale Transit Center	Yes	Yes	Yes	Yes	Yes
South Bloomington Transit Center	Yes	Yes	Yes	Yes	Yes
Mall of America Transit Center	Yes	Yes	Yes	Yes	Yes

APPENDIX D: PARK-AND-RIDE FACILITY AMENITIES

Table D: Park-and-Ride Amenities

Park-and-Ride	Predominantly Minority	Predominantly Low-Income	Shelter	Lights	Heater	Trash	Bench
Como & Eustis	Yes	Yes	Yes	No	No	No	Yes
Normandale Village	Yes	No	Yes	No	No	No	No
St. Edward's Catholic Church	No	No	No	No	No	No	No
Co Rd 73 & I-394 South	No	No	Yes	Yes	Yes	Yes	No
Minnetonka Blvd & Baker Rd	No	No	No	No	No	No	No
Minnetonka Blvd & Steele St	No	No	No	No	No	No	No
Excelsior City Hall	No	No	No	No	No	Yes	No
Westwood Lutheran Church	No	No	Yes	Yes	No	Yes	Yes
Little Canada Municipal Lot	No	Yes	No	No	No	No	No
Salem Covenant Church	Yes	Yes	Yes	Yes	No	No	Yes
Faith-Lilac Way Lutheran Church	No	Yes	No	No	No	No	No
Navarre Center	No	No	No	No	No	No	No
Wayzata Blvd & Barry Ave	No	No	Yes	Yes	Yes	Yes	Yes
Mermaid Supper Club	No	Yes	No	No	No	No	No
West River Rd & 117th Ave	No	No	Yes	Yes	No	Yes	Yes
Christ Episcopal Church	No	No	No	No	No	No	No
Church of Nazarene	Yes	Yes	Yes	Yes	Yes	No	Yes
Hwy 7 & Texas Ave	Yes	No	No	No	No	No	No
I-35W & Co Rd H	No	Yes	Yes	No	No	No	Yes
Hwy 61 & Lower Afton Rd	Yes	Yes	Yes	No	No	Yes	No
General Mills Blvd & I-394	No	No	Yes	Yes	No	Yes	Yes
St. Joseph's Church	No	No	No	No	No	No	No
Shoreview Community Center	No	No	No	No	No	Yes	No
Park Place & I-394	No	Yes	Yes	No	No	Yes	No
St. Luke's Lutheran Church	No	No	Yes	No	No	No	No
Richardson Park	No	No	Yes	No	No	Yes	No
Foley Blvd	No	Yes	Yes	Yes	Yes	Yes	Yes
Hwy 61 & Co Rd C	Yes	Yes	Yes	No	No	No	Yes
Hwy 7 & Vinehill Rd	No	No	No	No	No	No	No
65th Ave & Brooklyn Blvd	Yes	Yes	Yes	Yes	Yes	Yes	Yes

Park-and-Ride	Predominantly Minority	Predominantly Low-Income	Shelter	Lights	Heater	Trash	Bench
I-35W & 95th Ave	No	No	Yes	Yes	Yes	Yes	Yes
West St Paul Sports Complex	Yes	Yes	No	No	No	No	No
Woodbury Lutheran Church	No	No	Yes	Yes	No	Yes	Yes
St Croix Valley Recreation Center	No	No	Yes	Yes	No	Yes	No
Hwy 610 & Noble	Yes	No	Yes	Yes	Yes	Yes	Yes
Woodbury Theatre	No	No	Yes	Yes	Yes	Yes	No
Cottage Grove	No	No	Yes	Yes	Yes	Yes	Yes
Hadley Ave & Upper 17th Street	No	No	Yes	Yes	Yes	Yes	No
Hwy 100 & Duluth	No	Yes	No	No	No	No	No
Knox Avenue at Best Buy	Yes	Yes	Yes	Yes	Yes	No	No
Guardian Angels Catholic Church	No	No	Yes	Yes	Yes	Yes	Yes
Church of St. William	Yes	Yes	No	No	No	No	No
63rd Ave & Bottineau Blvd	Yes	Yes	Yes	Yes	Yes	Yes	No
Hwy 252 & 66th Ave	Yes	Yes	Yes	No	No	No	Yes
Grace Church	No	Yes	No	No	No	No	No
Skating Center	No	Yes	No	No	No	No	No
I-35 & Kenrick Ave	No	No	Yes	Yes	Yes	Yes	Yes
I-35W & Co Rd C	No	Yes	Yes	Yes	Yes	Yes	Yes
Running Aces	No	No	Yes	No	No	No	No
Forest Lake Transit Center	No	No	Yes	Yes	Yes	Yes	Yes
Hwy 36 & Rice St	Yes	Yes	No	Yes	No	Yes	Yes
Maple Plain	No	Yes	No	No	No	Yes	Yes
I-35E & County Road 14	No	No	Yes	Yes	No	Yes	No
I-35E & County Road E	No	No	Yes	Yes	No	Yes	No
Hopkins Park-and-Ride	No	No	Yes	No	No	Yes	Yes
Newport Transit Station	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Paul Parkway	No	No	Yes	No	No	Yes	No
Southdale Transit Center	No	No	Yes	Yes	Yes	Yes	No
South Bloomington Transit Center	No	No	Yes	Yes	Yes	Yes	Yes
Mound Transit Center	No	Yes	Yes	Yes	Yes	Yes	Yes

APPENDIX E: VEHICLE ASSIGNMENT SUMMARY BY ROUTE

Table E: Vehicle Assignment Summary by Route

Route	Predominantly Minority Route	Predominantly Low-Income Route	Type	Average Age Assigned	Average Age Available	Difference (Assigned-Available)
2	Y	Y	Core Local	3.94	3.56	0.38
3	Y	Y	Core Local	5.06	6.01	(0.95)
4	N	Y	Core Local	5.45	6.90	(1.45)
5	Y	Y	Core Local	5.17	6.35	(1.18)
6	N	N	Core Local	5.42	7.03	(1.61)
7	Y	Y	Core Local	4.19	6.52	(2.33)
9	N	Y	Core Local	5.86	7.18	(1.32)
10	Y	Y	Core Local	7.07	7.86	(0.79)
11	Y	Y	Core Local	7.84	8.23	(0.39)
12	N	N	Core Local	5.97	6.35	(0.39)
14	Y	Y	Core Local	5.12	6.57	(1.45)
16	Y	Y	Core Local	4.22	5.82	(1.60)
17	Y	Y	Core Local	7.17	8.22	(1.06)
18	Y	Y	Core Local	7.64	8.19	(0.54)
19	Y	Y	Core Local	4.96	5.55	(0.59)
20	N	N	Supporting Local	5.38	6.10	(0.72)
21	Y	Y	Core Local	4.65	5.48	(0.83)
22	Y	Y	Core Local	4.97	6.06	(1.08)
23	N	N	Supporting Local	5.98	7.57	(1.60)
25	N	N	Core Local	6.85	7.37	(0.52)
27	Y	Y	Supporting Local	4.90	4.56	0.34
30	Y	Y	Supporting Local	5.00	6.02	(1.02)
32	Y	Y	Supporting Local	6.41	5.69	0.71
39	Y	Y	Supporting Local	6.22	7.37	(1.15)
46	N	N	Supporting Local	6.05	7.59	(1.54)
53	Y	Y	Supporting Local	5.85	5.53	0.32
54	N	Y	Core Local	5.09	6.85	(1.76)
59	Y	Y	Core Local	6.69	7.38	(0.69)
61	Y	Y	Core Local	4.94	5.86	(0.92)
62	Y	Y	Core Local	4.62	5.47	(0.85)
63	Y	Y	Core Local	6.46	6.61	(0.15)
64	Y	Y	Core Local	5.92	5.96	(0.04)
65	Y	Y	Supporting Local	5.15	5.50	(0.34)
67	Y	Y	Core Local	5.17	6.79	(1.62)
68	Y	Y	Core Local	6.54	6.39	0.14
70	Y	Y	Core Local	5.12	5.46	(0.34)
71	Y	Y	Core Local	5.13	5.54	(0.42)
74	Y	Y	Core Local	4.81	5.51	(0.69)
75	Y	Y	Core Local	5.94	5.46	0.48
80	Y	Y	Supporting Local	1.99	2.00	(0.01)
83	N	N	Supporting Local	2.87	4.56	(1.69)
84	N	Y	Core Local	5.79	6.27	(0.48)
87	N	Y	Supporting Local	1.86	2.00	(0.13)

Route	Predominantly Minority Route	Predominantly Low-Income Route	Type	Average Age Assigned	Average Age Available	Difference (Assigned-Available)
94	Y	Y	Commuter Express	5.42	6.51	(1.10)
111	Y	Y	Commuter Express	7.53	7.35	0.18
113	N	Y	Commuter Express	6.63	7.17	(0.54)
114	N	Y	Commuter Express	6.68	7.02	(0.34)
115	N	N	Commuter Express	6.17	6.35	(0.18)
118	Y	Y	Commuter Express	4.81	5.98	(1.17)
129	N	N	Supporting Local	4.45	5.98	(1.53)
133	Y	N	Commuter Express	6.28	7.04	(0.76)
134	N	Y	Commuter Express	6.19	7.32	(1.13)
135	N	N	Commuter Express	6.14	7.20	(1.06)
141	Y	Y	Core Local	5.50	6.28	(0.78)
146	N	N	Commuter Express	6.82	7.45	(0.63)
156	N	N	Commuter Express	6.72	7.43	(0.71)
219	Y	N	Suburban Local	5.06	5.07	(0.01)
223	Y	N	Suburban Local	4.91	4.56	0.35
225	N	N	Suburban Local	4.84	4.56	0.29
227	N	N	Suburban Local	4.84	4.56	0.28
250	N	N	Commuter Express	6.39	6.70	(0.31)
252	N	N	Commuter Express	7.07	6.55	0.53
261	N	N	Commuter Express	6.89	6.67	0.23
262	N	N	Core Local	6.79	5.46	1.33
263	Y	Y	Commuter Express	5.98	5.65	0.33
264	N	N	Commuter Express	6.29	6.36	(0.07)
265	N	N	Commuter Express	6.25	5.67	0.59
270	N	N	Commuter Express	5.76	6.33	(0.57)
272	N	N	Commuter Express	6.98	5.57	1.41
275	N	N	Commuter Express	6.95	6.67	0.28
288	N	N	Commuter Express	7.20	7.03	0.18
294	N	N	Commuter Express	6.03	5.87	0.17
350	Y	N	Commuter Express	11.36	6.93	4.42
351	N	N	Commuter Express	5.13	6.22	(1.09)
353	N	N	Commuter Express	6.87	5.46	1.41
355	N	N	Commuter Express	5.71	6.92	(1.22)
361	N	N	Commuter Express	5.88	5.65	0.24
364	N	N	Commuter Express	4.82	4.56	0.27
365	N	N	Commuter Express	6.91	6.96	(0.06)
375	N	N	Commuter Express	5.12	6.64	(1.52)
415	N	N	Suburban Local	7.56	7.29	0.27
417	N	N	Suburban Local	4.85	4.56	0.29
452	Y	Y	Commuter Express	7.05	7.26	(0.20)
467	N	N	Commuter Express	6.46	6.78	(0.32)
515	Y	Y	Suburban Local	5.65	7.35	(1.70)
535	Y	Y	Commuter Express	6.03	7.33	(1.30)
537	N	N	Suburban Local	2.17	2.00	0.17
538	Y	Y	Suburban Local	2.10	2.00	0.10
539	N	N	Suburban Local	1.76	2.00	(0.23)

Route	Predominantly Minority Route	Predominantly Low-Income Route	Type	Average Age Assigned	Average Age Available	Difference (Assigned-Available)
540	Y	Y	Suburban Local	5.77	3.65	2.12
542	Y	Y	Suburban Local	6.49	3.65	2.84
552	Y	Y	Commuter Express	7.16	7.26	(0.09)
553	Y	Y	Commuter Express	6.88	7.33	(0.46)
554	Y	Y	Commuter Express	7.47	8.17	(0.69)
558	Y	N	Commuter Express	6.78	7.31	(0.54)
578	Y	N	Commuter Express	7.20	7.25	(0.04)
579	Y	Y	Commuter Express	6.98	7.35	(0.37)
587	N	N	Commuter Express	6.87	7.21	(0.34)
588	Y	Y	Commuter Express	6.76	7.23	(0.47)
589	N	N	Commuter Express	6.85	7.33	(0.48)
597	N	N	Commuter Express	6.78	7.18	(0.40)
604	N	N	Suburban Local	4.89	4.56	0.33
612	N	N	Suburban Local	4.57	3.65	0.92
614	N	N	Suburban Local	4.87	4.56	0.31
615	N	N	Suburban Local	4.95	4.56	0.40
643	N	N	Commuter Express	6.20	6.31	(0.12)
645	N	N	Suburban Local	5.53	6.13	(0.60)
652	N	N	Commuter Express	6.85	6.74	0.11
663	N	N	Commuter Express	6.58	6.49	0.09
664	Y	Y	Commuter Express	5.07	6.28	(1.21)
667	N	N	Commuter Express	6.05	6.14	(0.09)
668	Y	Y	Commuter Express	6.16	6.19	(0.03)
670	N	N	Commuter Express	1.71	6.93	(5.22)
671	N	N	Commuter Express	1.83	6.93	(5.10)
672	N	N	Commuter Express	5.31	5.98	(0.67)
673	N	N	Commuter Express	7.31	7.03	0.29
674	N	N	Commuter Express	5.45	5.98	(0.53)
677	N	N	Commuter Express	5.95	6.74	(0.79)
679	N	N	Commuter Express	7.34	6.41	0.93
705	Y	N	Suburban Local	3.93	3.65	0.28
716	Y	Y	Suburban Local	4.94	4.56	0.39
717	Y	N	Suburban Local	4.80	4.56	0.24
721	Y	Y	Suburban Local	5.16	4.87	0.29
722	Y	N	Suburban Local	5.41	4.73	0.68
723	Y	Y	Suburban Local	5.33	4.65	0.67
724	Y	Y	Suburban Local	5.27	4.84	0.44
755	Y	N	Commuter Express	5.85	6.03	(0.19)
756	N	N	Commuter Express	7.28	6.65	0.62
758	N	N	Commuter Express	6.07	6.27	(0.20)
760	Y	Y	Commuter Express	5.32	7.71	(2.39)
761	Y	Y	Commuter Express	5.92	5.00	0.93
762	Y	Y	Commuter Express	6.06	6.09	(0.02)
763	Y	N	Commuter Express	5.49	5.84	(0.34)
764	Y	Y	Commuter Express	6.20	7.04	(0.84)
765	Y	Y	Commuter Express	6.19	6.19	0.00

Route	Predominantly Minority Route	Predominantly Low-Income Route	Type	Average Age Assigned	Average Age Available	Difference (Assigned- Available)
766	Y	N	Commuter Express	6.39	6.79	(0.39)
767	Y	Y	Commuter Express	5.37	5.98	(0.61)
768	Y	N	Commuter Express	6.90	7.19	(0.29)
801	Y	Y	Suburban Local	6.83	6.83	0.00
805	N	Y	Suburban Local	6.83	6.83	(0.00)
812	Y	Y	Suburban Local	n/a	n/a	n/a
813	Y	Y	Suburban Local	n/a	n/a	n/a
814	Y	Y	Suburban Local	n/a	n/a	n/a
815	Y	Y	Suburban Local	n/a	n/a	n/a
824	Y	Y	Core Local	7.22	7.11	0.11
825	N	N	Core Local	6.38	6.23	0.14
831	N	N	Suburban Local	6.83	6.83	0.00
850	N	N	Commuter Express	5.22	8.24	(3.03)
852	N	Y	Commuter Express	5.20	5.02	0.18
854	N	N	Commuter Express	5.73	6.02	(0.29)
860	N	N	Commuter Express	6.99	7.03	(0.04)
865	N	N	Commuter Express	3.33	3.28	0.05
Northstar	N	N	Commuter Rail	No Data	No Data	No Data
Green Line	Y	Y	LRT	No Data	No Data	No Data
Blue Line	Y	Y	LRT	No Data	No Data	No Data
Red Line	N	N	Highway BRT	1.82	1.77	0.05
A Line	N	Y	Arterial BRT	4.67	4.67	0.00

**ATTACHMENT I: MINUTES NOTING
METROPOLITAN COUNCIL APPROVAL
OF TITLE VI PROGRAM**



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