

DRAFT TITLE VI PROGRAM

2023-2025



IN COMPLIANCE WITH FTA CIRCULAR 4702.1B

The Met 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. Many instances of the word "minority" have been replaced with "BIPOC". However, some of these terms are used sparingly 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 Met 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 Met Council by serving on key advisory committees.

The Met 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 Met 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 33 million bus and rail passengers in 2021 with award-winning, energy-efficient fleets. As is the trend throughout the transit industry, this number has dropped significantly since the COVID-19 pandemic started in March 2020.

Metro Transit operates the METRO Green Line, METRO Blue Line, Northstar commuter rail line and 125 bus routes, using a fleet of about 916 buses and 100 rail vehicles. In the last three years, Metro Transit opened the METRO Orange Line, a highway bus rapid transit (BRT) line that compliments the METRO Red line, along with the METRO A and C lines (that run on existing arterial roadways). 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 transportation services division oversees operations of Metro Mobility, Transit Link, and contracted regular bus routes.

Contracted regional bus routes are operated by private providers using Met 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 BIPOC 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, the 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.

Black, Indigenous, People of Color (BIPOC) 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.

BIPOC 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 BIPOC population that exceeds the percentage of BIPOC 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.

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. Also commonly referred to as regular route transit.

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
- Any federal agreement, arrangement, or other contract that has as one of its purposes the provision of assistance

Limited English Proficiency (LEP) 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 refers to a person whose median household income is at or below 185% of 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.

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 BIPOC area means a geographic area, such as a neighborhood, census tract, block or block group, or traffic analysis zone, where the proportion of BIPOC individuals residing in that area exceeds the average proportion of BIPOC 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 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 intra-facility 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 to plan or distribute services and benefits within its service area.

Statewide transportation improvement program (STIP) means a statewide prioritized listing and/or 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 assist 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 Title VI Webpage](#)
- [Metro Transit Title VI Webpage](#)

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, and below is a list of all public facilities where the notices are posted.

Vehicles
All Metro Mobility vans
All fixed-route buses
All Northstar commuter rail vehicles
All Metro light rail vehicles
Facilities (public meeting areas)
Saint Paul Operations and Maintenance Facility
Blue Line Extension Project Office

Operations Support Center
Overhaul Base
Southwest Project Office
Transfer Road Facility
Transit Control Center
East Metro Garage
Heywood Garage
Martin J Ruter Garage
Nicollet Garage
South Garage
24th St Warehouse - MOW Building/Storage
NorthStar Big Lake
Rail Operations & Maintenance Facility
Minneapolis Transit Store
Saint Paul Transit Store
Environmental Services Facilities
Metropolitan Wastewater Treatment Plant
Blue Lake Wastewater Treatment Plant
Eagles Point Wastewater Treatment Plant
Seneca Wastewater Treatment Plant
Empire Wastewater Treatment Plant
Hastings Wastewater Treatment Plant
St. Croix Valley Wastewater Treatment Plant
East Bethel Wastewater Treatment Plant
Rogers Wastewater Treatment Plant (Ro
Regional Maintenance Facility (RMF)
Administrative Buildings
Metropolitan Council Regional Administration Building (Saint Paul)
Metro 94 Business Center
Well@Work Clinic - Jackson St.
Metro Transit Heywood Campus

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 Met Council’s Office of Equity and Equal Opportunity (OEEO). The complaint must meet the following requirements:
 - a. Complaint shall be in writing and signed by the complainants.
 - b. Complaints must include the date of the alleged act of discrimination (the date when the complainants became aware of the alleged discrimination, the date on which that conduct was discontinued, or the latest instance of the conduct).
 - c. Complaints must present a detailed description of the issues, including names and job titles of those individuals perceived as either witnesses or subjects in the complained-of incident.
 - d. Allegations received by fax or e-mail will be acknowledged and processed, once the identities of the complainants 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 Met 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 Met Council for processing.
2. Upon receipt of the complaint, the Director of Equity and Equal Opportunity or director’s designee (the manager of the Investigations and Resolutions unit) 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 Met Council’s sub-recipients of federal funds, the Met Council will assume jurisdiction and will investigate and adjudicate the case. Complaints against the Met Council will be referred to FTA or the appropriate federal agency for proper disposition pursuant to their procedures.
3. 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 allegations must involve a covered basis such as race, color, national origin.

- c. The allegations 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 Met 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 Met Council's records, identifying its basis and alleged harm.
- 6. In cases where the Met Council assumes the investigation of the complaint, the Met 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 Met Council's written notification of acceptance of the complaint to furnish their response to the allegations.
- 7. The Met 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 Met 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 not received any Title VI-related complaints or lawsuits since the last Title VI Program update.

Public engagement

The Metropolitan Council has adopted several policies and practices to ensure the needs of community stakeholders are centered in all Met Council decisions. The various policies and methods used by the Met Council and Metro Transit to engage BIPOC and limited English proficient (LEP) populations authentically and meaningfully 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 regional development guide, including the 2040 Transportation Policy Plan. It establishes principles and processes for public engagement to ground Met 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 Met Council’s Public Engagement Plan reflects a shift in the Met 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 Met Council, local governments and local officials, and the community at-large.

Ultimately, all the Met 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 Met Council’s long-range planning areas.

A specific focus of the Met Council's engagement work is removing barriers to participation and ensuring people most affected by a decision can influence it. To that end, the Met 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 Met Council-wide engagement and customer-related activities.

On Sept. 14, 2022, the Met Council also adopted a [transportation addendum to the Public Engagement Plan](#) that satisfies the requirements of federal law to guide participation in long-range transportation planning efforts (see Attachment D). This document includes references to the Met Council's Public Engagement Plan, but more specifically identifies the key planning processes of the Met Council as the designated metropolitan planning organization for the Twin Cities region and how people can be involved in shaping those plans.

The Met Council is also in the process of updating the Public Engagement Plan.

In updating the transportation addendum to the Public Engagement Plan, staff conducted a peer review of six Metropolitan Planning Organizations: The Denver Regional Council of Governments, (Portland) Metro, Puget Sound Regional Council (Seattle), the San Diego Association of Governments, Hillsborough (Tampa) Transportation Planning Organization, and The North Central Texas Council of Governments (Dallas-Fort Worth). This review compared Met Council transportation-related public participation guidance with the guidance from peer agencies and identified places where the Met Council could improve and expand on the prior plan. In addition to the peer review and the Transportation Management Area Planning Certification Review, staff also considered recent events such as Gov. Tim Walz's 2019 executive order to expand tribal-state relations that included the Met Council in the government-to-government relationships between the State of Minnesota and Minnesota Tribal Nations.

Major changes to the public participation plan for transportation include the following:

- Include tribal governments and tribal consultation strategies
- Identify that the transportation addendum to the Public Engagement Plan will be updated regularly, particularly the year prior to an update to the Transportation Policy Plan
- Evaluate the Met Council's transportation public participation efforts using effectiveness measures and communicate those measures and results

The Public Engagement Plan will be updated in conjunction with the creation of the Met Council's 2050 regional development guide, which will be ready for Met Council adoption in 2024.

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.

Following the 2040 regional planning process, the Metropolitan Council performed an in-depth process evaluation and determined the 2050 planning process would integrate the different planning areas and policy plans into the 2050 regional plan. The engagement planning process will also be more integrated to reflect that direction. To that end, engagement plans are being created to respond to specific audience needs, which will allow for a more focused and responsive process, particularly related to what might be historically considered Title VI audiences.

The 2050 regional planning process has just begun – initial engagement to establish regional vision, direction, and goals has been focused on the advisory committees that support Met Council policymaking. Subsequent plans will be created and implemented through 2024 for other aspects.

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, feedback from policymakers throughout the region, and ideas and feedback from other regional stakeholders.

Engagement for the 2020 update to the 2040 Transportation Policy Plan was guided by the Transportation Public Participation Plan. [A public comment period](#) was conducted from June to August 2020, including proactive social media and virtual public meeting engagement. The plan was updated amid the COVID-19 pandemic and emergency orders prohibited in-person gatherings. More than 200 people and organizations participated in the public engagement process.

We also used social media to highlight new work plan items that will inform the 2050 Transportation Policy Plan. As with the web page, we also translated the posts into Hmong, Somali and Spanish. Several Facebook posts were boosted to reach a broader audience than typically follows the Metropolitan Council Facebook page.

Key Engagement Themes

Public comments produced the following themes:

- Eliminate road expansion and invest in transit and active transportation to mitigate climate change and lower vehicle miles traveled
- Black, brown, and indigenous communities, and low-income populations are the most impacted by climate change; plan and invest to mitigate (transportation) inequities
- Promote best practice in parking policy to influence climate change and other negative effects

Additional comment topics

- Safety and security on transit
- Transit investment priorities (arterial BRT, other corridors)
- Support for bicycle and pedestrian investment
- Lack of support for light rail transit
- Support for bus and regional fleet electrification

The following communities and interest groups were engaged during the Transportation Policy Plan update process, and all the planning studies included in the work program for the transportation plan:

- 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

Many of these concerns were addressed in the update to the [Transportation Policy Plan](#) adopted by the Met Council in 2020. Other items, more operational in nature or broader than the transportation plan, were addressed in other actions and planning items, that will be reported on and reflected in the 2050 regional planning process.

Regional Solicitation

The Regional Solicitation is a process that allocates federal transportation funds to locally initiated projects to meet regional transportation needs. The Met 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, transit providers, and cities in the region.

The Met Council and the Transportation Advisory Board recommended federal funding for locally initiated projects in 2020 and will complete another round in late 2022, following extensive review, evaluation, and public engagement processes.

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 Met 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 Met Council, and other regional transit providers.

The Met 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 StarTribune (a newspaper of regional circulation). Met Council staff also engaged the members of our TAB and the Met Council's Transportation Committee to share the public comment period and pop-up public meetings with their constituencies. During the public comment periods for recent updates, the Met Council scheduled virtual public meetings to increase awareness of the TIP and facilitate public feedback from transportation network users.

Key engagement themes included the following:

- Acknowledge climate change, including efforts to reduce greenhouse emissions, avoid new highway expansion, and promote racial and economic equity
- Prioritize and expand transit, travel demand management, bike, and pedestrian-only projects
- Transition diesel buses to electric
- Prioritize electric vehicle charging infrastructure, quicker adoption of electric vehicles, and electric bus deployment in areas experiencing poor air quality
- Reduce vehicle miles traveled
- Accelerate efforts reducing traffic deaths and serious injuries through more aggressive safety targets

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 Met 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, Minnesota Department of Transportation, the Minnesota Pollution Control Agency, and the Metropolitan Airports Commission.

Key engagement themes from comment periods for the work program include the following:

- Support for planning studies identified
- Support for continued emphasis on climate change mitigation and reducing vehicle miles traveled in our regional policies, transportation planning work, and planned investments
- Support for continued emphasis on equity in our regional policies, transportation planning work, and planned investments

The Met 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 2027, 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. It is projected to provide 29,000 rides per day in 2035. This new transit line will bring many opportunities for development and community growth.

Since starting construction on the project in 2019, the Metropolitan Council has made significant efforts to engage community stakeholders, including populations with limited English proficiency, who identify as BIPOC, and who experience low incomes. A specific Communication and Public Involvement Plan has been elaborated and is updated annually. Project outreach staff provided input into the development of the specifications for the civil and systems construction contracts, including the qualifications for the contractors' public involvement plans and the hiring of their own outreach staff. The three Met Council outreach staff interact multiple times per week with the contractor's outreach liaison.

Community outreach events

Green Line Extension project outreach staff have hosted or attended nearly 300 public meetings, community open houses, other organization meetings, or property owner meetings annually since January 2019, when construction started on the project. In 2019, the project office hosted open houses to describe and inform the public about planned construction activities. The project office has also held annual town halls to inform community members about construction activities for the upcoming year.

During the COVID-19 pandemic, many organized informational events were implemented virtually. In some cases, attendance at these events were higher than in-person events. In 2021 and 2022, events such as outdoor walking tours have returned to be in-person, allowing community members to experience the progress of construction up close. Some meetings remain virtual at the request of the community.

The project office has identified populations with limited English proficiency 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 maps and graphics to illustrate concepts) to engage populations with limited English proficiency

To engage populations with limited English proficiency, 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 an on-demand basis.

Construction hotline and email address

The Metropolitan Council established a telephone number and email address to receive general comments and questions about the Green Line Extension. As part of construction, a construction 24-hour hotline was established to connect with stakeholders regarding issues arising due to construction activities. The construction hotline is staffed by an answering service; project outreach staff are immediately notified of issues reported by the community by use of a call tree or via email. The project's email account is monitored daily by project staff and all comments and questions that require a response are routed to the appropriate outreach staff member.

Advisory committees

- The Metropolitan Council established the Green Line Extension 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 community advisory committee 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 were represented on the community advisory committee. In 2018, the committee disbanded as design of the project was completed.
- The business advisory committee represents the diversity of commercial activities along the Green

Line Extension route, including corporations, small businesses, chambers of commerce, non-profit organizations, developers, and landowners. The business advisory committee continues to meet at least bi-annually throughout construction of the project.

- The communications steering committee assists project outreach staff in planning communication and outreach efforts and evaluating effectiveness. The communications committee includes representatives from project partner agencies and municipal stakeholders. The committee meets at least annually and on an as-needed basis
- The 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. The committee usually meets monthly during construction of the project.
- In 2020, project staff established construction information workgroups for each of the five cities in the project corridor. These workgroups provide feedback to construction and outreach staff on communications and outreach activities, as well as support for sharing project information to the larger communities and stakeholders. These workgroups meet at least quarterly and most meet every month or every other month.

Publications

During construction, the primary method by which construction progress is communicated is through the Green Line Extension Construction Update. The update is sent out weekly from April through October, and bi-weekly from November through March. Stakeholders' updates are posted on the project's website. Communications staff produce fact sheets and brochures focusing on specific topics such as station location, LRT engineering, environmental stewardship, and construction impacts.

GreenLineExt.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.

Media relations

The Green Line Extension 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 BIPOC news organizations. Project office media relations staff responds to queries from reporters and pitch stories about the project.

Social media

Project staff use Twitter, Instagram, and the Met Council's Facebook page to promote public events and announce project milestones and uses a push email utility to send out meeting notices, newsletters, and press releases. In 2022, the project has more than 16,500 email subscribers and 1,555 Twitter followers.

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

METRO Blue Line Extension

The METRO Blue Line Extension is looking for a route that does not use eight miles of railroad right of way as previously planned. Because of the shift away from railroad property, some of the project can remain the same, while other areas need to change. The light rail transit project will extend the existing METRO Blue Line from Target Field Station northwest to Brooklyn Park and connect communities along the way. 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 populations with limited English proficiency, who identify as BIPOC, and who experience low incomes, 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 populations with limited English proficiency, who identify as BIPOC and who experience low incomes:

- Community Advisory Committee (CAC)
- Business Advisory Committee (BAC)
- Community engagement cohort
- 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 community advisory committee 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 business advisory committee members represent the diversity of commercial activities along the corridor, including corporations, small businesses, chambers of commerce, non-profit organizations, developers, and landowners.

The project is contracting with community and culturally based organizations to specifically connect with hard-to-reach populations. The community consultant organizations were selected to reflect constituencies identified in project stakeholder analysis along with their geographic focus within designated project areas, prioritizing low-income communities and communities of color. Twelve cohort

members were selected to assist the project from March 2021 to January 2022, and six cohort members were contracted through summer 2022 to ensure ongoing engagement support through the route selection process. The organizations include:

Community engagement cohort	Areas served Area 1 – Brooklyn Park Area 2 – Robbinsdale and Crystal Area 3 – North Minneapolis
Asian Media Access Inc.	Area 1, 2, 3
CAPI USA	Area 1, 3
Encouraging Leaders	Area 3
Harrison Neighborhood Association	Area 3
Juxtaposition Arts	Area 3
Lao Center of MN	Area 1, 3
Liberian Business Association	Area 1, 2
Northside Economic Opportunity Network	Area 2, 3
Northside Residents Redevelopment Council	Area 3
West Broadway Business Coalition	Area 3
Jordan Area Community Council	Area 3
Hawthorne Neighborhood Council	Area 3
Pueblos de Lucha y Esperanza	Area 1, 2, 3

Staff have and continue to engage populations with limited English proficiency 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 populations with limited English proficiency

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

METRO Orange Line

The METRO Orange Line opened for service in late 2021. The service benefits existing riders and help attract new riders with more reliable and frequent service, seven days a week. Additionally, service improvements to bus routes that connect with the METRO Orange Line are helping attract new riders to the entire transit system. The all-day, frequent service of the METRO Orange Line complements 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 connects people across the region to job centers, housing options, and destinations in the corridor. This new transportation option has expanded accessibility and promotes and complements compact, walkable neighborhoods in the station areas.

Construction on the northern end of the project began in 2018 under MnDOT's 35W@94 project, with the next phase of work beginning in 2019 in the I-494 area. Staff implemented a public outreach plan to provide construction communications and outreach to stakeholders. This plan prepared

stakeholders for construction and promoted the benefits of Orange Line service by maintaining ongoing communication with the public. The tools used throughout the construction phase included:

- 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
- Meetings with stakeholders

As opening day approached, communications focused on the details of the new service and information about how to ride. 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 like existing METRO service. We expect the line to serve and draw riders 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 2025. More information can be found on the project's website at metrotransit.org/gold-line.

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 Met 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 have engaged corridor residents, businesses, organizations, and transit riders throughout the project planning and design process to solicit their input and address their needs and concerns. As the project prepares to enter the construction phase of the project, comprehensive outreach and engagement will continue.

Concerted effort has also been given to communities that have been traditionally underrepresented in transit planning processes: BIPOC, low-income, and populations with limited English proficiency, 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 lead staff person determines which strategies to implement based on the current issue or question that the project is facing. Some of the public involvement and communication methods that have been used throughout the project and will continue as the project advances include:

- **One-on-one** conversations to receive specific comments from property owners or other directly impacted individuals
- **Project committees** including a Community and Business Advisory Committee (CBAC) comprised

of residential and business representatives throughout the corridor.

- **Door-knocking or canvassing** to reach specific affected properties, especially when a decision that could change impacts to specific properties 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 business groups on specific 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 surveys, polling, or comment forms** to survey stakeholders as part of an outreach event or separate initiative (print surveys at events)
- **Project website** (frequently updated) including a description of the project, timeline, map, frequently asked questions (FAQs), video, public engagement activities, and meeting dates and agendas for advisory committees
- **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 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
- **Media ads** especially diverse and ethnic media channels
- **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 populations with limited English proficiency
- 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.

Due to COVID-19, in-person outreach and engagement was limited from March 2020 through spring 2022. Digital engagement including virtual individual and group meetings, as well as media promotion and direct mailings were increased to broadly reach folks throughout the height of the pandemic. In-person engagement was available to reach underserved populations and those to whom virtual engagement was a barrier.

In addition to increased individual property owner engagement and right-of-way acquisition engagement throughout 2020, 2021, and 2022, the main broader outreach initiatives since fall 2019 include:

[Environmental Assessment in fall 2019](#)

[30% design and station access engagement in spring 2020](#)

[60% design engagement in fall 2020](#)

Gold Line project staff are currently focusing on final design and pre-construction communications and engagement throughout the remainder of 2022, with anticipation to begin construction communications and engagement in late 2022.

METRO Purple Line

The METRO Purple Line BRT project is a proposed 15-mile bus rapid transit (BRT) line in Ramsey County in the northeastern part of the Twin Cities Metropolitan Area. The proposed line will travel between downtown Saint Paul and White Bear Lake, serving the communities of Saint Paul, Maplewood, Vadnais Heights, Gem Lake, White Bear Township, and White Bear Lake.

The Purple Line will feature electric buses operating primarily in dedicated transit lanes mostly following Robert Street and Phalen Boulevard from downtown Saint Paul, Ramsey County rail right-of-way (shared with the Bruce Vento Regional Trail) and Highway 61 north of Interstate 694 into White Bear Lake. The line will serve 21 neighborhood-scaled, high-amenity stations with frequent, comfortable, and convenient daily service from early morning to late evening in both directions.

The line will connect with existing and future light rail and BRT service of the METRO system, including direct connections to the Green Line, Gold Line, B Line, G Line, and H Line, as well as local and express bus routes. The line will increase accessibility to jobs, housing, and services, thus improving the attractiveness and competitiveness of the northeast metro area. Purple Line BRT is planned to begin revenue service in 2026. More information can be found on the project's website at metrotransit.org/purple-line.

A well-informed and engaged public strengthens the project and helps create a more useful transit system for all. The Met Council, Metro Transit, and the project's local funding partner, Ramsey County, 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.

Purple Line project staff will seek to engage corridor residents, businesses, organizations, and transit customers 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: people of color, low-income communities, people with limited English proficiency (LEP), people with disabilities, and other historically marginalized groups.

The Purple Line recently transitioned planning to the Metropolitan Council and Metro Transit as the lead agency from Ramsey County (formerly known as the Rush Line BRT project). From March 2018 to May 2021, Rush Line project staff conducted or staffed 165 events including pop-up meetings, drop-in discussions, presentations to stakeholders and attendance at community festivals. This work included both general engagement efforts, which aimed to raise awareness of the project to residents, employees, and other stakeholders in the project area, and targeted engagement efforts, which focused on informing stakeholders and gathering input about specific aspects of the project. More information on outreach and engagement that was completed during the previous phase of the project while Ramsey County was the lead agency can be found in the below linked documents:

[Rush Line Bus Rapid Transit Public Engagement Summary March 2018 - May 2021](#) [Rush Line Communication and Public Engagement Plan](#)

As of May 2022, Purple Line project staff are having individual and small group conversations with project partners, stakeholders, and key businesses regarding routing alternatives to the north-end alignment of the line. Broad outreach and engagement regarding these potential modifications occurred throughout summer 2022. More information can be found in the [May 2022 Purple Line Project Update Newsletter](#).

Another main outreach and engagement activity since the beginning of the 2022 has been convening project committees, including a Community and Business Advisory Committee (CBAC), which had its first meeting in June 2022. This committee will have residential and business representatives from throughout the corridor to help shape the planning and design of the project.

METRO D Line

The METRO D Line is the region's third planned arterial BRT line, currently under construction. 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 late 2022. 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.

Since March 2021 engagement has focused on sending regular construction communication, responding to issues that arise, and sharing planned service changes on local service in the D Line corridor (routes 5, 39, 133, 721, 724) that will be implemented when D Line opens. 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.

Since B Line planning began in 2019, Metro Transit has received more than 2,500 comments about the project. Feedback from customers and community members has been essential in forming the corridor plan. To engage the community in the design of B Line staff have:

- Milestone-based B Line Update email (email)
- Regular website updates (weekly/as needed)
- Letter to station neighbors at planned stations at beginning of design phase, near end of design
- Email communication of major design updates and milestones to elected officials and community organizations for distribution in their newsletters or social media
- Regular social media updates as project information allows
- Letters to station neighbors at least two weeks before design workshops
- Door-knocking and phone calls to reach station neighbors at station locations before design workshops
- Targeted social media posts to station areas notifying upcoming design workshops
- Virtual public meetings

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.

In January 2020 the E Line route was adopted by the Met Council. In 2021 and 2022 engagement focused on developing a corridor plan and receiving comments on recommended plan. To reach people a variety of methods were used including:

- Project website (www.metrotransit.org/e-line-project)
 - Key information and station concepts
 - Draft corridor plan
 - Corridor overview video
 - Survey form for feedback on specific stations
- Direct mailing (postcard)
- Email to subscribers and rider alerts
- In-person feedback at key bus stops
- Partner with community organizations and neighborhood groups along corridor
- Flyers to post along corridor
- Social media

Network Next

Through a project called Network Next, Metro Transit worked with the community to identify, screen, evaluate, and prioritize the next BRT lines to develop. Through multiple efforts to connect with diverse communities, 4,116 people responded to a survey. BIPOC respondents accounted for 31% of the total surveys completed.

In February 2021, following months of analysis and community engagement, Metro Transit finalized recommendations for the next expansions in the BRT network. The following lines are identified in that process.

METRO F Line

The METRO F Line will serve the Central Avenue corridor, largely replacing Route 10 from downtown Minneapolis to Northtown Mall via Central and University avenues. Engagement for the line will begin later in 2022, as the project works to develop a corridor plan over the next year.

METRO G Line

The METRO G Line is a planned bus rapid transit (BRT) line that will provide faster and more reliable transit service in the Rice/Robert corridor served by Route 62 and Route 68 along Rice Street and Robert Street. It will run from Little Canada through downtown Saint Paul to West St. Paul. The line was also identified as part of the Network Next project.

Planning will begin later in 2022, following the F Line, with engagement focused on reaching residents to develop the corridor plan through 2024.

METRO H Line

The METRO H Line is a planned bus rapid transit (BRT) line that will provide faster and more reliable transit service in the Como/Maryland corridor served by Route 3. It will travel between downtown Minneapolis and Sun Ray Transit Center on the east side of Saint Paul. The H Line was prioritized for the near-term as part of the Network Next engagement. Planning for the H Line will begin in 2023.

Better Bus Stops

Better Bus Stops works to improve the customer experience at the bus stop through transit information, accessible boarding areas, pedestrian connections, shelters, and maintenance of shelters. Annually, information about the capital plan for shelters and boarding areas is shared online, with local policymakers, neighborhood organizations, and adjacent properties.

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

Better Bus Routes

Metro Transit's Better Bus Route program focuses on improving the speed, reliability, accessibility, and customer experience of high ridership local bus routes. These projects implement low-cost, common-sense strategies in a relatively short timeframe to make a quick, but meaningful impact on service. Our aim is to implement improvements on a new route annually. While each route is different, strategies common across all projects include:

- Consolidating bus stops for up to quarter-mile spacing
- Relocating select stops past a signalized intersection to reduce delays
- Expanding the no-parking zone around select stops to ensure buses can fully pull to the curb at the bus stop
- Simplifying the route alignment and schedule
- Installing concrete pads to improve accessibility for customers
- Installing new shelters at qualifying bus stops

Route 2 (2018) – On our pilot route we placed seven new shelters that benefitted 1,200 riders. Along with the existing shelter, nearly 88 percent of all Route 2 boardings were now at a sheltered bus stop.

Route 63/Route 323 (2020) – We replaced a low-ridership branch with a suburban circulator (Route 323), simplifying the route and allowing all Route 63 trips to end at a transit center. We also improved the frequency of weekday service.

Route 3/Route 33 (2021) – We significantly simplified the route by replacing a low-ridership branch with a circulator (Route 33) and providing more Route 3 trips where demand is highest. We also streamlined the route through downtown Minneapolis along Washington Avenue, and extended service to the North Loop. Finally, weekend frequency in Saint Paul was improved.

Route 22 (2022) – Among other changes, we plan to remove two underused branches and relocate the primary downtown Minneapolis bus stop to a location with shelter, heat, light, and transit information. This relocation would benefit more than 300 riders on Route 22 and Route 14.

METRO Orange Line & Connecting Bus Study

The purpose of the METRO Orange Line Connecting Bus Study is to review service in the study area in conjunction with the opening of the Orange Line and recommend service changes to maximize access to the Orange Line. The Orange Line Connecting Bus Study Recommended Plan was built upon on an evaluation of current transit service in the study area conducted in 2019. The preceding existing conditions report determined the market conditions, effectiveness, and efficiency of existing transit service and set the foundation for exploring potential new connecting service with the Orange Line, transit market opportunities, and facility needs. The existing conditions report and other project materials are available at metrotransit.org/OLCB.

Public outreach and engagement were conducted in fall 2019 to inform the creation of the concept plan. The results of this engagement were also compared to the findings of Metro Transit's Listening and

Learning Through Crisis outreach in summer 2020, from which staff determined that this project's 2019 engagement work remained valid. Another round of engagement occurred in winter and spring 2021 to collect feedback on the published concept plan, which included draft service equity analysis results. The recommended plan was created in response to the results of these public outreach and engagement efforts, as well as the preliminary results of the service equity analysis. Full documentation of the public outreach and engagement efforts completed as part of the study are available at metrotransit.org/OLCB.

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.

To help ensure best practices in engagement and customer relations Metro Transit now has a department of community affairs. The focus of the department and the team of community outreach and customer relations staff is to ensure the agency is effectively seeking out, listening to, and acting on customer and community feedback. The team works to support engagement on capital projects, new transit lines, service changes, facility maintenance and improvements; advocating for the needs of customers in our transit investments and service changes; and training people how to use transit and responding to customer complaints and feedback. Community outreach coordinators have been working to develop long-lasting relationships with transit riders, and people in community, particularly 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.

Much of the focus from March 2020 to today, has been on adjusting methods to continue to hear from riders and receive feedback on changes to service and capital projects during the time of COVID-19, where in-person gatherings were not possible, and outreach directly on buses was not prudent. Some of way Metro Transit remained nimble during COVID-19 included:

- Consistent demographic information collected in surveys to help reach out and target those not being heard from
- A listening campaign to understand customer needs
- Virtual engagement events:
 - Community listening session, townhalls, and information sessions hosted at multiple times of the day
 - Meeting with regional advisory committee and stakeholders
- More focus on seeking out stakeholders via mail, email, and phone calls
- “Driveway Talks,” which are small-group gatherings that can occur outside, and socially distanced, where outreach staff go directly to community

As COVID-19 restrictions have changed and case numbers have gone down, efforts have been supported through:

- Regular attendance at larger community events spread across geographies, as well as smaller neighborhood events
- Informing riders on buses or at bus stops through informational items or surveys
- Hosting events in prominent community locations or at transit facilities
- 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

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, in an effort to be 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.

Language Assistance Plan

The Metropolitan Council has prepared a formal Language Assistance Plan (Attachment E) for providing language assistance to people with limited English proficiency (LEP), based on LEP guidance from the U.S. Department of Transportation. The Met Council’s Language Assistance Plan demonstrates the Met Council’s commitment to provide meaningful access to all individuals accessing the Met Council’s services, including Metro Transit, Metro Mobility, and Transit Link. The federal guidance notes that effective implementation plans include the following five elements:

- Identifying populations with limited English proficiency who need language assistance
- Providing language assistance measures
- Training staff
- Providing notice to people who have limited English proficiency
- Monitoring and updating the plan

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

Identifying populations with Limited English Proficiency

A four-factor analysis was completed to identify populations with limited English proficiency who need language assistance. Based on U.S. Census Bureau 2016-2020 American Community Survey (ACS) five-year estimates, the Metro Transit service area is home to 2,168,074 people, 6.8% (147,814) of whom are people with limited English proficiency. Spanish is the most frequent language spoken in the Metro Transit service area other than English, comprising 2% (42,981) of the total service area population.

Table 1 lists populations with limited English proficiency within Metro Transit’s service area according to the 12 foreign language classifications contained in the 2016-2020 ACS at the tract level. No languages have populations with limited English proficiency that exceed 5% of the total population in the service area. Eleven of the 12 language classifications have at least 1,000 people with a limited English proficiency.

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

Language	Number of LEP Speakers	% of Total LEP	% of Total Population
Spanish	42,981	29.1%	2.0%
Other Asian and Pacific Island languages	41,337	28.0%	1.9%

Language	Number of LEP Speakers	% of Total LEP	% of Total Population
Other or unspecified languages	31,069	21.0%	1.4%
Vietnamese	6,592	4.5%	0.3%
Other Indo-European languages	5,927	4.0%	0.3%
Chinese (incl. Mandarin, Cantonese)	5,789	3.9%	0.3%
Russian, Polish, and other Slavic languages	5,139	3.5%	0.2%
French (incl. Haitian, Cajun)	3,054	2.1%	0.1%
Arabic	2,735	1.9%	0.1%
Korean	1,360	0.9%	0.1%
Tagalog (incl. Filipino)	1,045	0.7%	0.0%
German (incl. other West Germanic languages)	786	0.5%	0.0%

Further analysis indicates that:

- LEP Spanish speakers are widely distributed relative to other language groups and are in both urban and suburban communities.
- LEP speakers of “other Asian and Pacific Island languages” reside in north Minneapolis, in Saint Paul along University Avenue and on the east side, and also in suburbs in the north, northwest, and west metro. Hmong and Karen are the most prevalent languages within this classification.
- LEP speakers of “other and unspecified languages” are dispersed throughout the metro, with communities concentrated in central Minneapolis and along University Avenue in Saint Paul. Somali is the most prevalent language within this classification.
- LEP Vietnamese speakers are in north and northwest areas of the metro, but they also reside along University Avenue in Saint Paul.

Data collected by the Met Council are used to supplement census data to gauge the needs of populations more precisely with limited English proficiency. Metro Transit call center data, along with census data, support the conclusion that Metro Transit interacts most commonly with populations with limited English proficiency who speak **Spanish, Hmong, Somali, Vietnamese, and Karen**.

Language Assistance Measures

Metro Transit, Metro Mobility, and First Transit (a contract transit service provider on behalf of the Met Council), use several strategies to provide language assistance to customers with limited English proficiency, including:

- Language Line phone services to facilitate interactions between customers with limited English proficiency 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 customers with limited English proficiency 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 outreach coordinators 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

Future strategies to better serve customers with limited English proficiency

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

Metro Transit will be implementing direct response interpretation services for Limited English Proficiency (LEP) customers wishing to speak to a Metro Transit's transit information or customer relations representatives through its main number 612-373-3333. This service allows customers to select their preferred language at the start of their call and connect directly with an interpreter to assist with their call. The following languages will be supported:

- Spanish
- Somali
- Russian
- Hmong
- Vietnamese
- Karen

Customers seeking support in other languages can still utilize interpretation services by connecting with transit information or customer relations representatives and requesting an interpreter.

Metro Transit will also be exploring the potential of adding Vietnamese, Hmong, and Russian to its NexTrip and Go-To Card automated phone line.

Staff training

The Met Council provides basic training for employees at Metro Transit and Metro Mobility call centers for utilizing the services of Language Line to help facilitate meaningful interactions with customers with limited English proficiency. In addition, Metro Transit and the Met Council's Office of Equity and Equal Opportunity developed language 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 and updating the Language Assistance Plan

The Met Council is committed to continuously improving its Language Assistance Plan. To that end, the

organization will revise the plan with more appropriate strategies. These may include future bus operator trainings and resources. Additionally, the Met Council, Metro Transit, Metro Mobility, and Transit Link will assess the viability and cost-effectiveness of pursuing and implementing new technologies.

BIPOC 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 Met Council and committee meetings and hearings and express their points of view on matters being considered.

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 Minnesota governor using a process administered by the Minnesota secretary of state. Other committees consist of a combination of members appointed by the Met 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*	68.8%	7.2%	10.3%	8.2%	0.5%	0%	5%	-
Metropolitan Council (16)	62.5%	12.5%	12.5%	6.25%	6.25%	0%	12.5%	0%
Land Use Advisory Committee (17)	70.6%	0%	5.9%	0%	0%	0%	11.8%	11.8%
Equity Advisory Committee (20)	20%	15%	25.0%	25.0%	0%	0%	25%	5%
Livable Communities Advisory Committee (15)	60%	6.7%	20.0%	6.7%	0%	0%	0%	6.7%
Metro Parks & Open Space Commission (9)	66.7%	22.2%	11.1%	11.1%	0%	0%	0%	11.1%
Transportation Advisory Board (33)	88.2%	0%	0%	3%	0%	0%	3%	6%
Transportation Advisory Board Technical Advisory Committee (31)	61.3%	0%	3.23%	0%	0%	0%	0%	35.5%
Transportation Accessibility Advisory Committee (9)	77.8%	0%	0%	0%	0%	0%	0%	22.2%

* U.S. Census Bureau 2020 Decennial Census.

Encouraging BIPOC community participation

The Met Council has taken many steps to promote and encourage participation from BIPOC 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.

During the COVID-19 pandemic, we were prohibited from organizing large-scale, in-person public meetings, but utilized technology to encourage participation. In fact, we had many more people – including people from BIPOC communities – participate in this virtual engagement.

It is important to note that the COVID-19 pandemic, and the community concern and unrest following the killing of George Floyd created a challenging engagement environment for all Met Council work. We undertook a significant community effort related to transit safety during this time, and partners indicated challenges that impacted participation. More than 1,000 people participated in the transit safety effort, guided by a community advisory committee that both planned and facilitated the engagement. The committee was representative of BIPOC communities, youth, and people living with disabilities, which increased participation among people of color.

During recent recruitment periods for advisory committees and open Metropolitan Council positions, we conducted virtual interviews and engagement opportunities, while still providing a distanced, safe in-person experience. We also promoted openings for committees widely, including the following:

- The Met Council's website and extensive email network, which includes more than 141,000 subscribers
- 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 metropolitan planning organization (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
- University of Minnesota

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 Met 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 the Met Council's ADA & Title VI Administrator, Guthrie Byard.

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

If a Met Council program or subrecipient is found out of compliance or is believed to be out of compliance with Title VI, the Met 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
- 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, no facilities were sited requiring a facility siting equity analysis. Metro Transit did occupy leased space in an existing facility for its Light Rail Materials Management Warehouse. The facility is scheduled to be permanently located in a new facility, but not within the next three years.

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 with a population of 200,000 or more 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 BIPOC 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 BIPOC 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 2,168,074 based on 2016-2020 ACS five-year estimates.² Areas with greater than average BIPOC and low-income populations (31.3% and 22.8%, respectively) have a higher level of transit service (Figure 2, Figure 3). METRO light rail and bus rapid transit routes serve BIPOC and low-income concentrations, as do other routes in Metro Transit's high-frequency network.

Table 3 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 BIPOC and low-income populations live proximate to bus and transitway service than non-BIPOC and non-low-income populations in Metro Transit's service area.

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 younger 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 2016-2020 American Community Survey (ACS) five-year estimates at the census tract level; tracts whose centroid was within the service area were used for population calculations.

Figure 1: Metro Transit Service

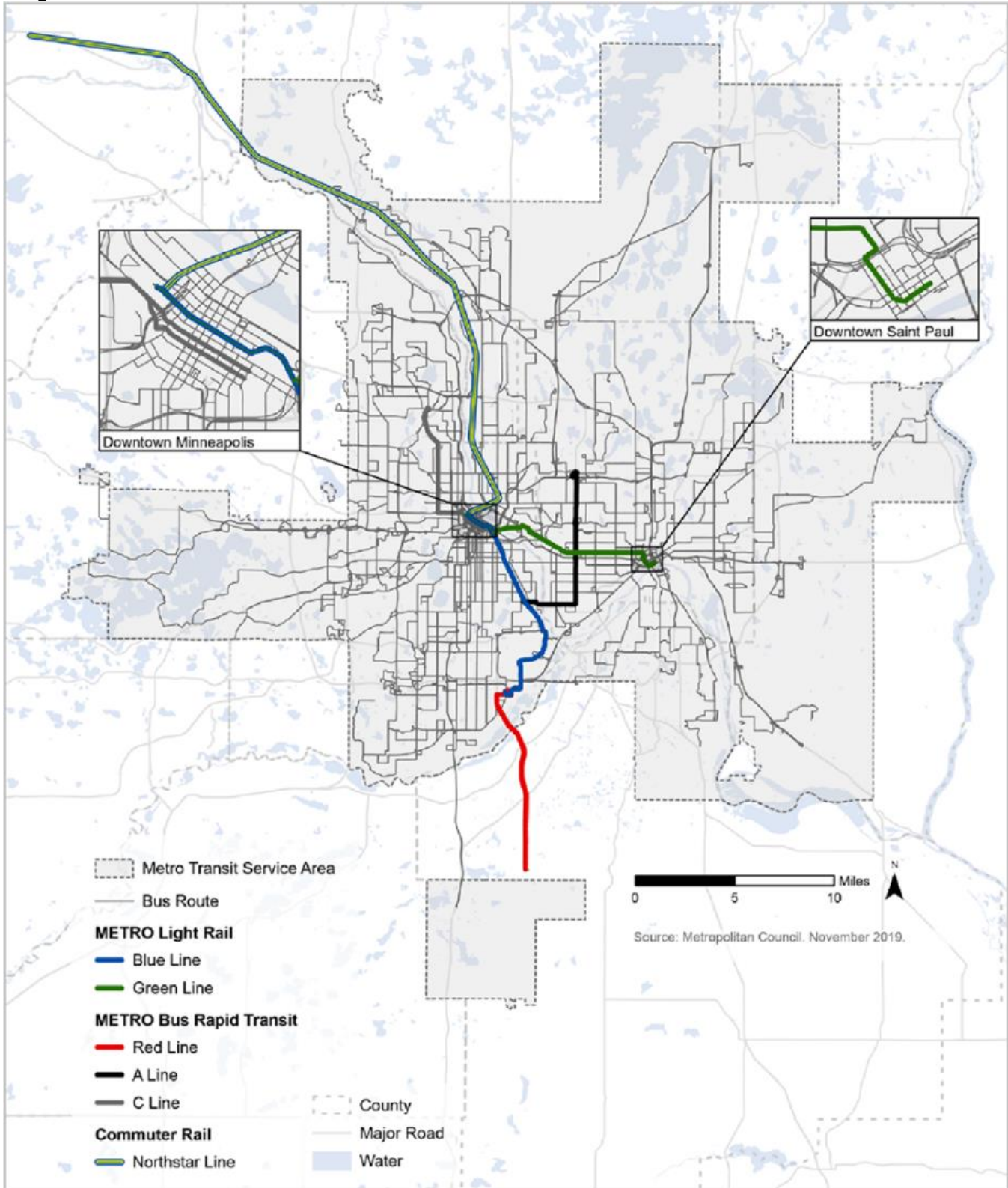


Figure 2: Metro Transit Service and Percentage of BIPOC Population

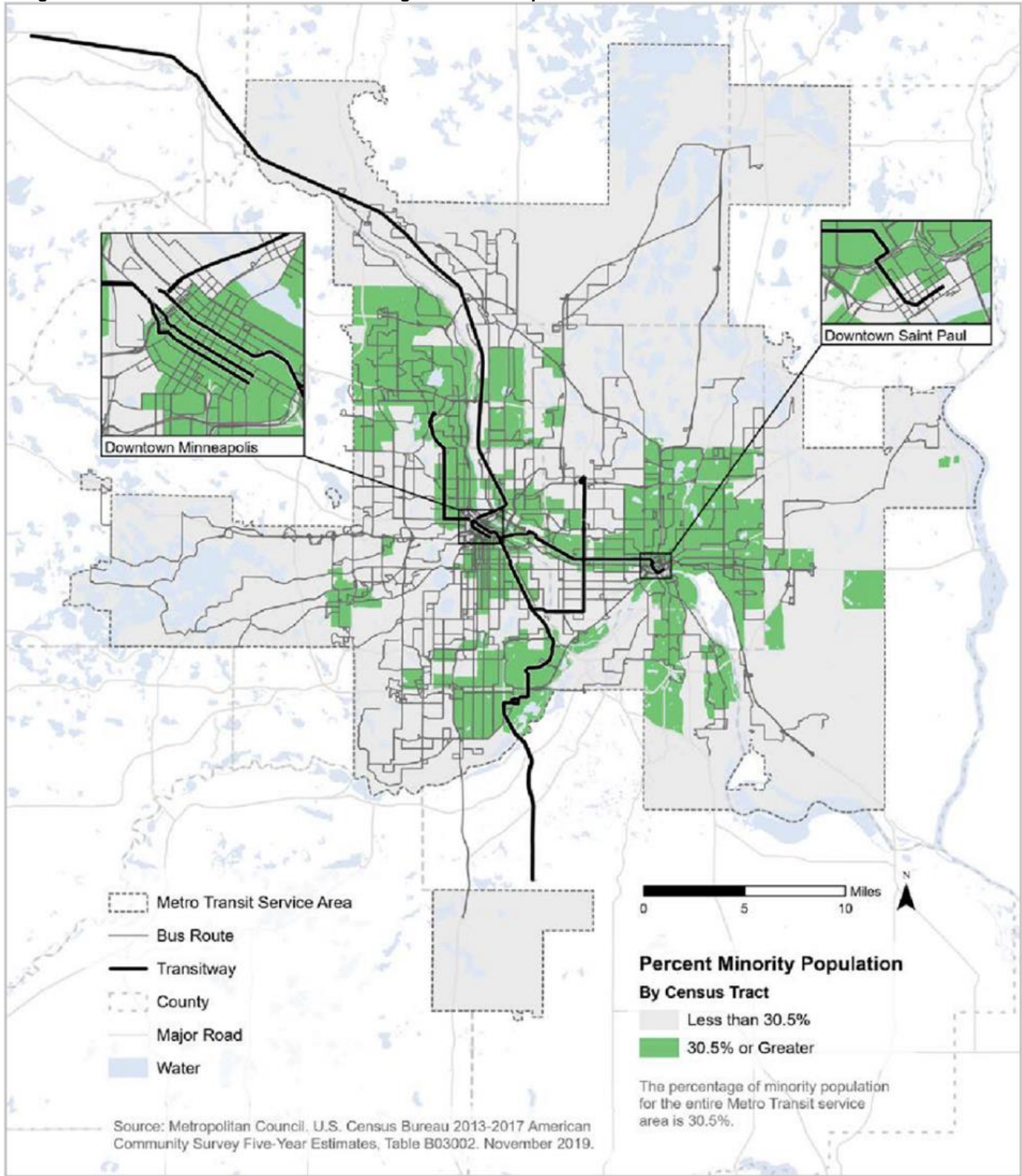


Figure 3: Metro Transit Service and Percentage of Low-Income Population

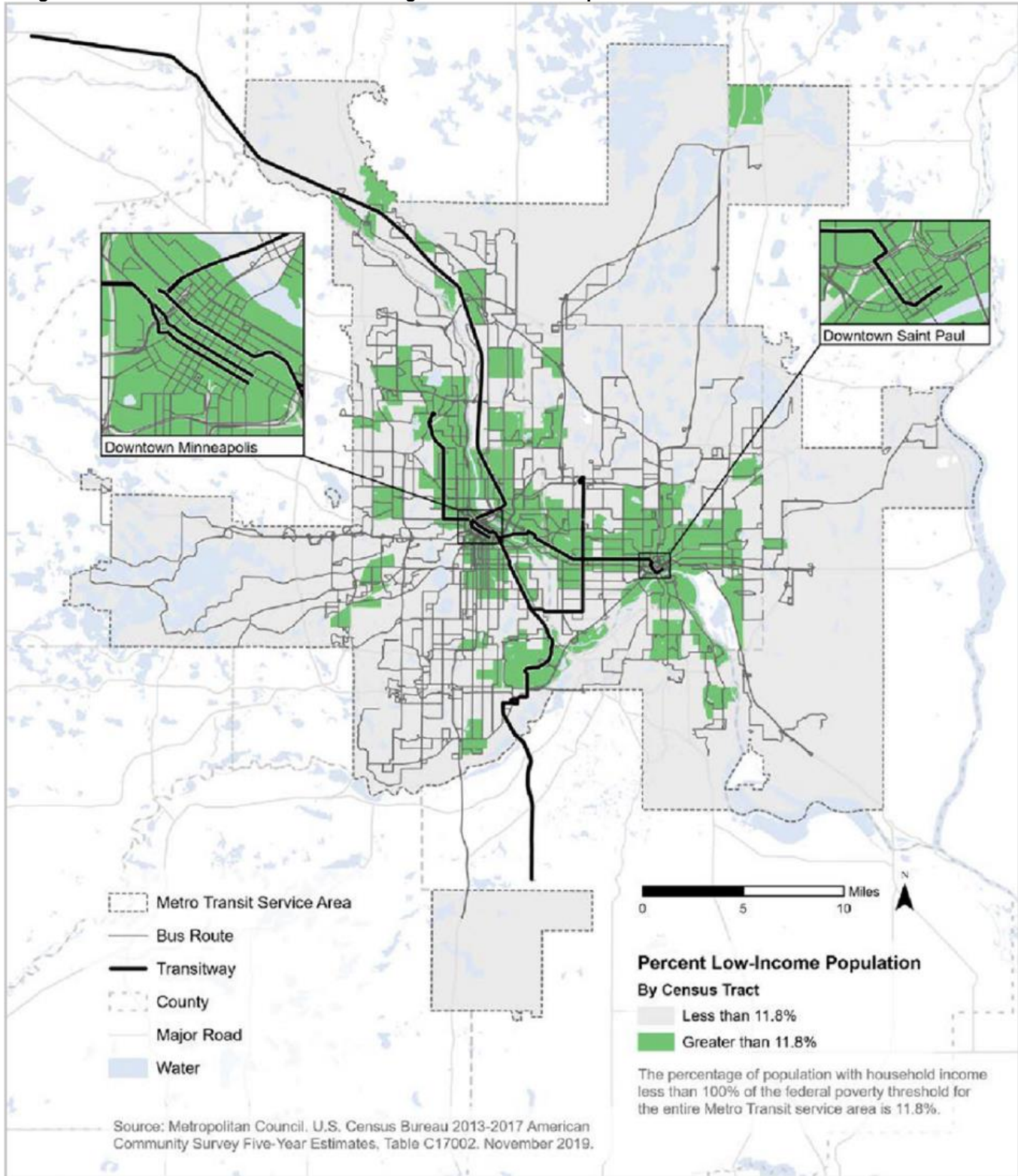


Table 3: Proximity to Metro Transit Service

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	2,168,074	53.0%	19.6%
BIPOC population	678,607	70.9%	28.6%
Non-BIPOC population	1,489,467	44.9%	15.4%
Low-income population	494,321	30.4%	13.9%
Non-low-income population	1,673,753	52.9%	18.8%

*LRT, BRT, Northstar Commuter Rail

Source: U.S. Census Bureau 2020 Decennial Census and 2016-2020 American Community Survey (ACS) 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 BIPOC and low-income populations, respectively. Existing facilities include transitways, transitway stations, transit centers, park-and-rides, and administration support, and operations and maintenance facilities.

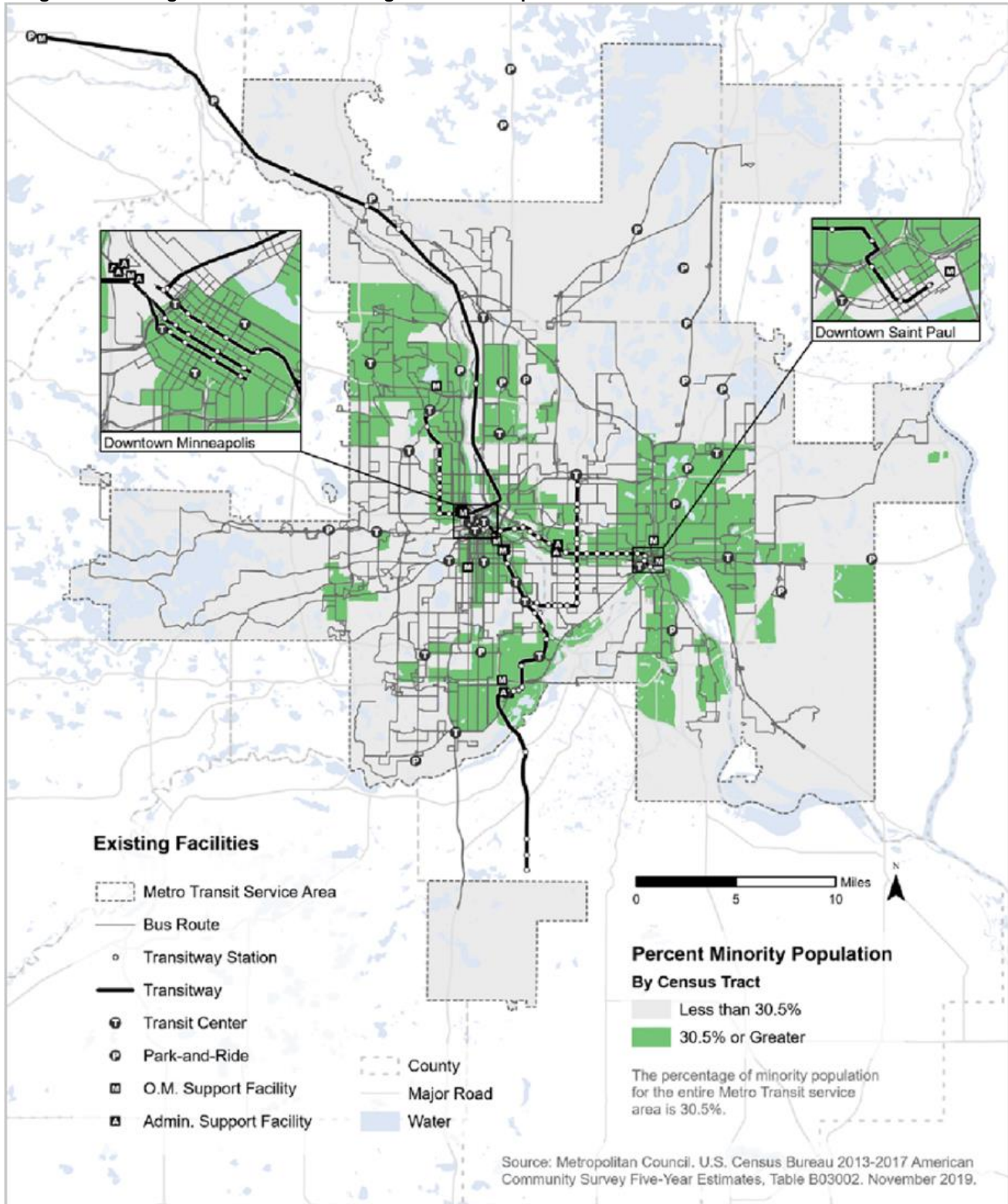
Park-and-ride facilities are surface lots and structured ramps predominantly located outside of the region’s urban centers that are served by express bus, bus rapid transit, or rail. Park-and-rides are important tools for creating locations with the customer density required to provide cost-effective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

The siting of park-and-ride facilities is based on several market conditions and factors. Park-and-rides are optimally located in a congested travel corridor, upstream from major traffic congestion, with service to major regional destinations. Facility design accounts for 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 percentage of BIPOC populations (Figure 4); just a few are in areas with above-average percentage of low-income people (Figure 5).

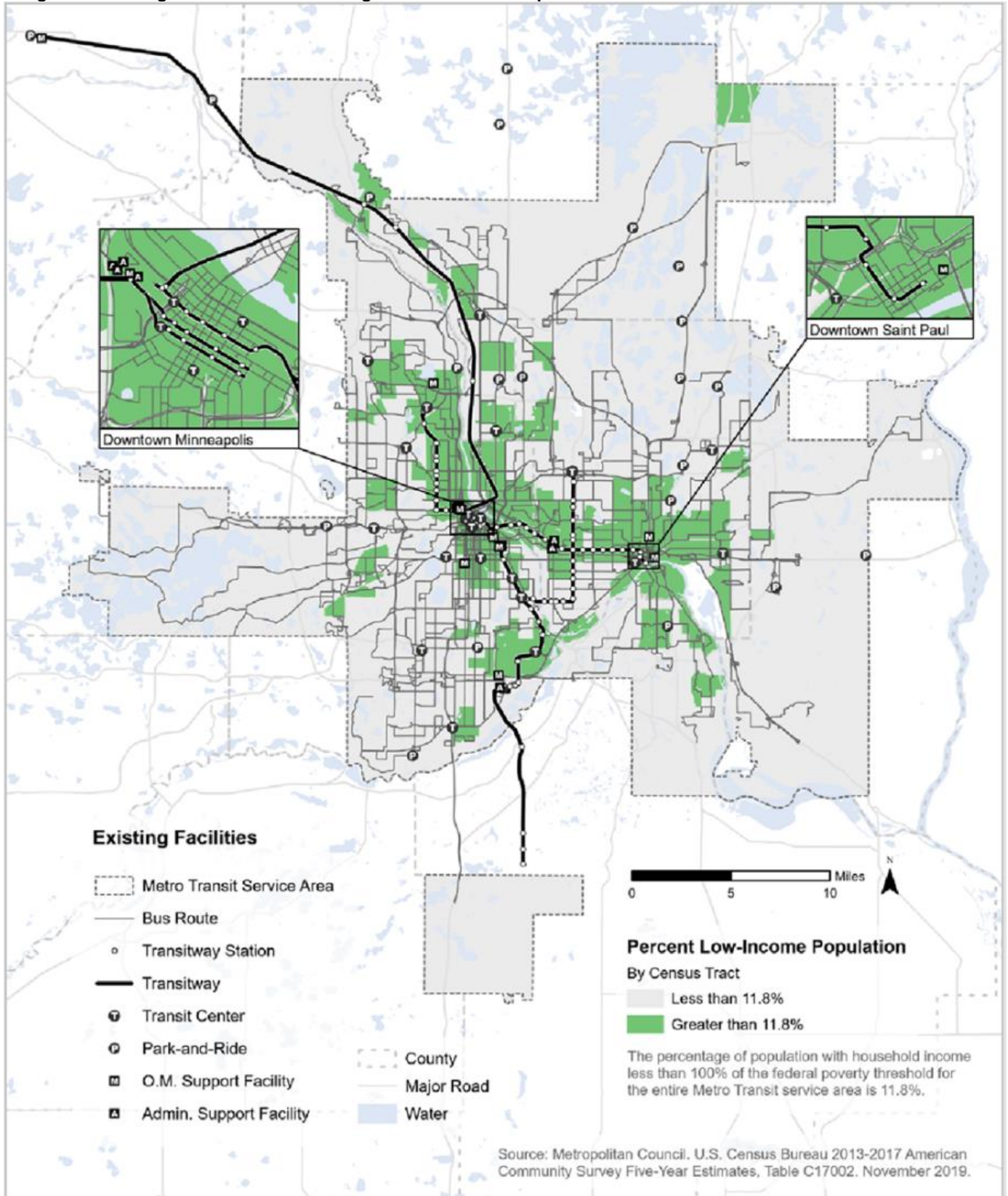
Existing transit centers are predominantly located in census tracts with above-average percentages of BIPOC and low-income populations (Figure 4, Figure 5). Transit centers are locations where two or more transit routes connect to provide comfortable and convenient locations for customers to connect 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 Percentage of BIPOC Population



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

Figure 5: Existing Facilities and Percentage of Low-Income Population



Recently completed and planned facilities

Table 4 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 BIPOC and low-income populations in Figure 6 and Figure 7. Most recently completed and planned facility improvements are in, or planned for, areas with above-average percentages of BIPOC and low-income populations.

Table 4: Recently Completed and Planned Transit Facility Improvements

Status	Facility Types	Project Name	Project Description
Completed	BRT	METRO Orange Line	BRT corridor between downtown Minneapolis and Burnsville
Completed	Bus stops	Better Bus Routes Program (Route 63)	Corridor-wide shelter and ADA improvements
Completed	Support facility	Heywood Garage modernization	New bus operations and administrative offices; improvements to maintenance shop area
Completed	Support facility	Light Rail Training Center	Renovation of Maintenance of Way building for new training center use
Completed	Transit Center	Brooklyn Center Transit Center Renovation	Enhanced customer boarding areas, including ADA improvements
Completed	Transit Center	Mall of America Transit Station renovation	Improved customer boarding areas and indoor access to mall
Completed	Transit Center	MSP Terminal 1 Transit Center	Relocation and improvement of the MSP Terminal 1 bus stop to new ground transportation facility
Ongoing	BRT	METRO D Line	Rapid bus corridor between Brooklyn Center Transit Center and Mall of America
Ongoing	Bus stops	Better Bus Routes Program (Route 3)	Corridor-wide shelter and ADA improvements
Ongoing	Bus stops	Better Bus Stops Program	Systemwide shelter and ADA improvements
Ongoing	Bus stops	Downtown Minneapolis Hennepin Avenue bus customer facility improvements	Construction of new shelters with heat/light, real-time information, and other amenities on Hennepin Ave
Ongoing	LRT	METRO Green Line Extension	New light rail corridor between downtown Minneapolis and Eden Prairie
Ongoing	Park & Ride	Park & Ride pavement improvement: Fort Snelling Park & Ride North Lot	Repaving of surface lot
Ongoing	Park & Ride	Park & Ride Pavement Improvement: I-35W & Co Rd H Park & Ride	Repaving of surface lot
Ongoing	Support facility	Blue Line Operations & Maintenance Expansion	New Rail Control Center; expansion of maintenance bays
Ongoing	Support facility	Downtown Saint Paul Police Substation	Substantial satellite office for transit police on ground level of US Bank Building on Minnesota St @ 6th St in downtown Saint Paul
Ongoing	Support facility	North Loop Garage	New bus garage in Minneapolis
Ongoing	Transit center	Northtown Transit Center relocation	Relocation of existing transit center to adjacent location, incorporating enhanced customer boarding areas
Planned	BRT	METRO B Line	Rapid bus corridor between planned METRO Green Line West Lake Station and Snelling Avenue

Status	Facility Types	Project Name	Project Description
Planned	BRT	METRO E Line	Rapid bus corridor between METRO Green Line Stadium Village or Westgate Station to Southdale Transit Center
Planned	BRT	METRO F Line	Rapid bus along Central Avenue corridor
Planned	BRT	METRO G Line	Rapid bus along Rice/Robert corridor
Planned	BRT	METRO Gold Line	BRT corridor between downtown Saint Paul and Woodbury
Planned	BRT	METRO Purple Line	BRT corridor between downtown Saint Paul and TBD northern terminus (White Bear Lake, Maplewood, or other)
Planned	Bus stops	Better Bus Routes Program (Route 22)	Corridor-wide shelter and ADA improvements
Planned	Bus stops; Transit center	Mobility hub improvements	Strengthen connections between shared mobility and transit uses at strategic locations
Planned	LRT	Lake St/Midtown Station renovation	Complete renovation of existing METRO Blue Line Lake St/Midtown Station LRT station
Planned	LRT	Blue Line LRT Enhancement Project	Replacement of light rail track and signal components from Mall of America to MSP Airport Terminal 2 (Phase 2) and from MSP Airport Terminal 1 to Cedar-Riverside Station (Phase 3)
Planned	Support facility	Heywood Office remodel	Floor-by-floor renovation of existing Heywood office building
Planned	Support facility	Material management storage facility	Construction of new Material Management storage facility or warehouse
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
Planned	Support facility	Saint Paul OMF LRV storage barn	New facility to store LRVs on site immediately east of existing Saint Paul OMF facility
Planned	Transit center	38th St Station Transit Center renovation	Renovation of bus transit center at METRO Blue Line 38th St Station to improve bus operations, pedestrian access, micromobility facilities and bicycle infrastructure
Planned	Transit center	Rosedale Transit Center improvement	Enhance customer boarding areas, including ADA improvements
Planned	Transit center	Sun Ray Transit Center renovation	Renovation of existing Sun Ray Transit Center

Figure 6: Recent and Planned Facilities and Percentage of BIPOC Population

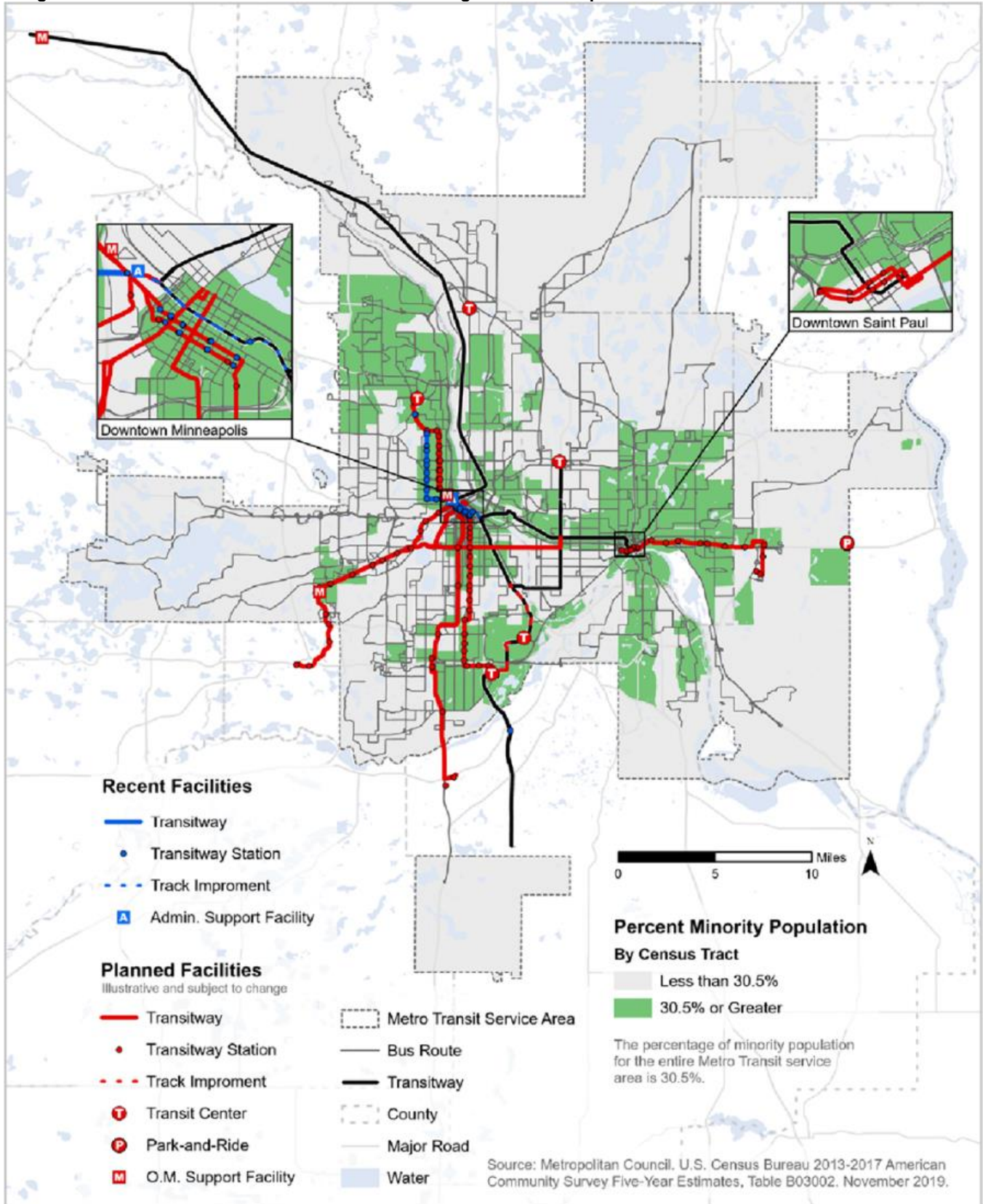
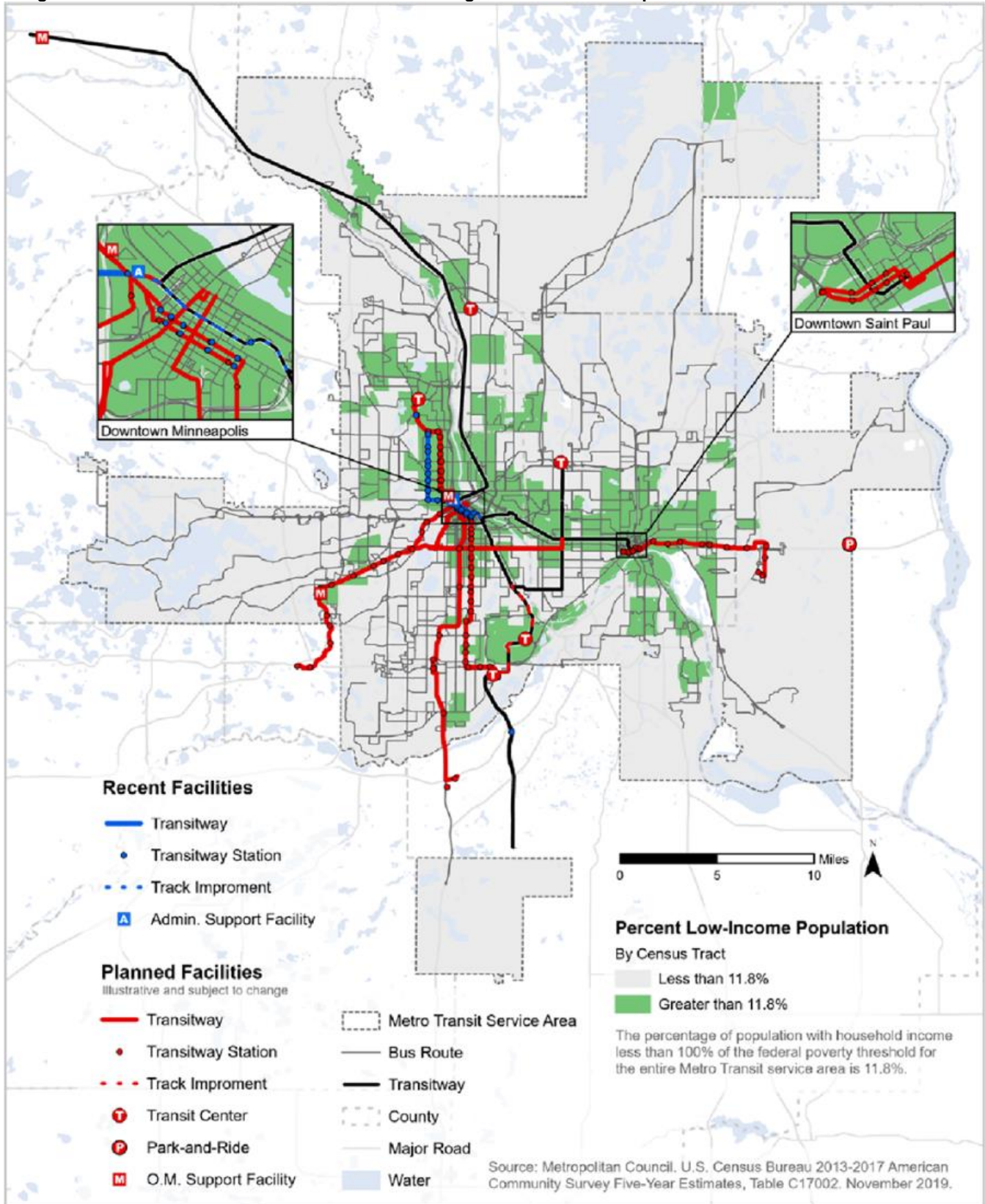


Figure 7: Recent and Planned Facilities and Percentage of Low-Income Population



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 BIPOC riders and non-BIPOC riders, and trips taken by BIPOC riders and non-BIPOC riders. Demographic information shall also be collected on fare usage by fare type amongst BIPOC 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 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 on all transit 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 Travel Behavior Inventory survey, the results from the Metro Transit Customer Survey are believed to be subject to significant response biases.

The Metropolitan Council’s Travel Behavior Inventory, 2016 Transit On-Board Survey is one component of the broader data program. Conducted continuously over a 10-year cycle, the Travel Behavior Inventory is a survey of travel in the seven-county region that the Met Council uses to inform travel forecasting and funding decisions. The inventory 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 Met Council and regional transit providers use these data to update the regional travel-demand forecasting model and understand transit ridership. Additional information on the Travel Behavior Inventory program is available on the [Metropolitan Council’s Studies and Reports website](#).

The most recent complete Travel Behavior Inventory, 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 Travel Behavior Inventory, 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 regional contracted fixed routes).

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

In 2021, a pilot Transit On-Board Survey was conducted on Metro Transit’s busiest routes. Routes surveyed include the METRO Blue and Green Lines, METRO A and C Lines, and local bus routes 2, 3, 5, 6, 10, 18, 19 (partial), and 21. Supplemental demographic information is included in this report to highlight how user characteristics of these routes have changed from 2016 to 2021. Because the 2021 data does not fully cover the Metro Transit service area, specific Title VI measures have not been tabulated using the new data. Note that throughout this document “Travel Behavior Inventory, Transit On-Board Survey” refers to the 2016 dataset. Use of the 2021 dataset is explicitly called out when referenced.

Survey results

The Travel Behavior Inventory, 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% of Metro Transit customers are BIPOC (Figure 8), compared to 30.5% 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 BIPOC group among the Metro Transit customer base.

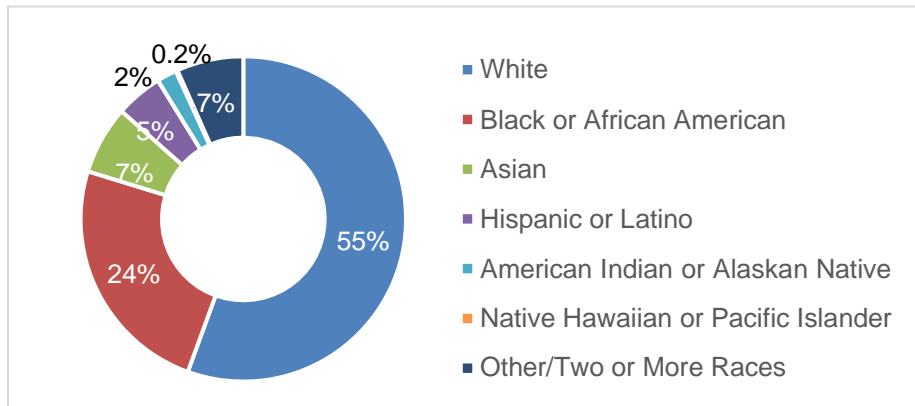


Figure 8: Race and Ethnicity

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

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

Figure 9 shows the change in race and ethnicity on select routes from 2016 to 2021. The negative values for white and Asian populations indicate a decline in use of the study pilot routes from 2016 to 2021. Conversely, there was an increase in Black/African American and Hispanic/Latino populations using pilot routes. Note that this data does not represent the entire Metro Transit service area, therefore unlinked trip-weighting factors are used in both datasets. Unlinked as opposed to linked trip-weighting factors are used as the pilot data is expanded to route-level boardings.

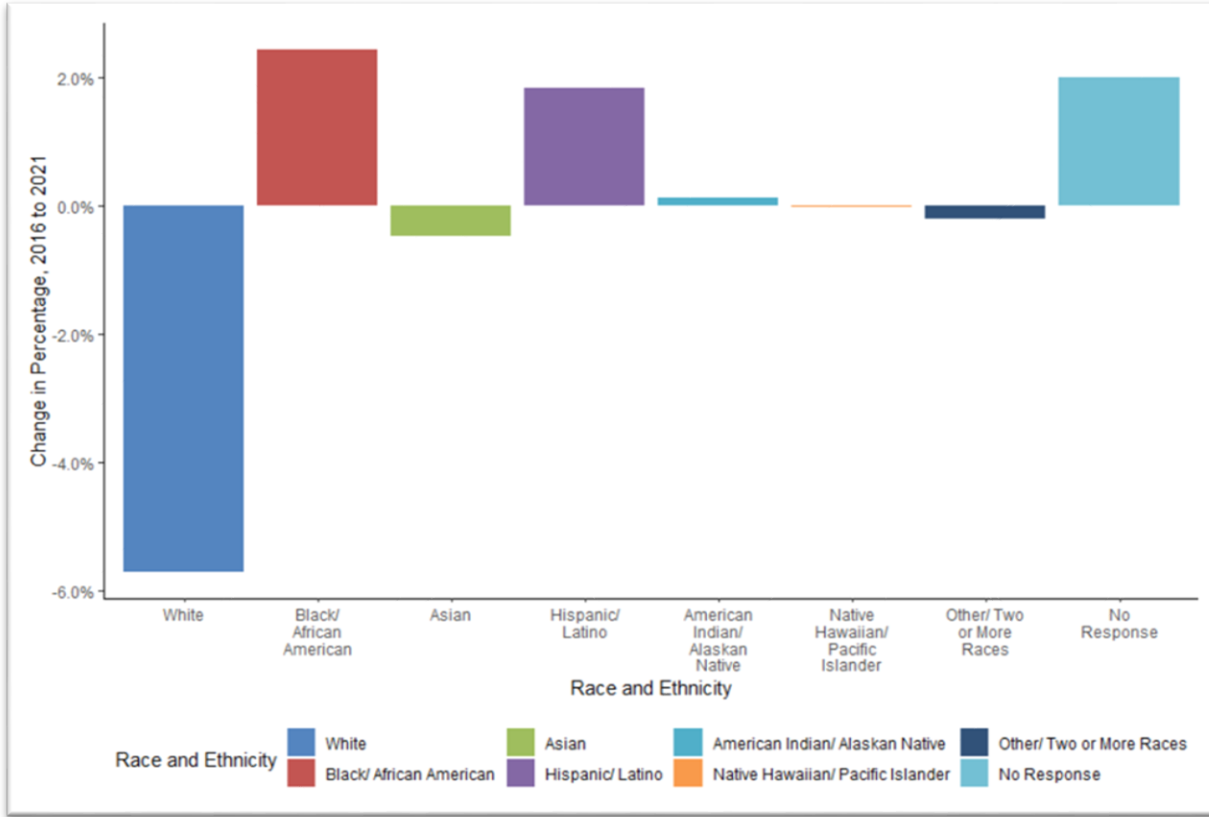


Figure 9: Race and Ethnicity Change, 2016-2021

Source: Metropolitan Council TBI Transit On-Board Survey, 2016 and Metropolitan Council TBI Transit On-Board Survey, 2021 Pilot.

As shown in Figure 10, two-thirds of Metro Transit riders report annual household income of less than \$60,000; 45% of all customers report income less than \$35,000.

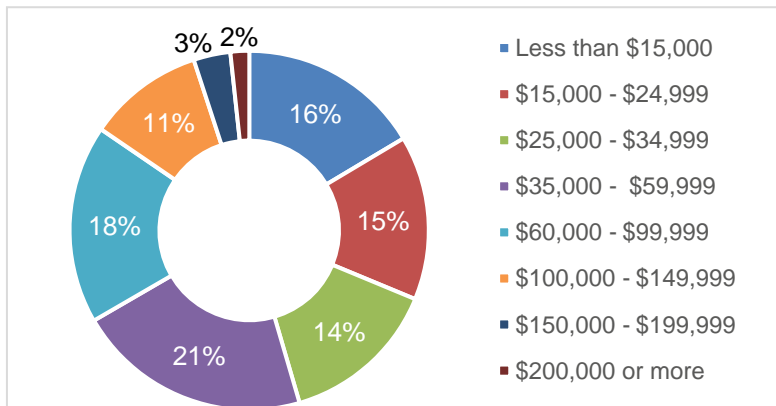


Figure 10: Annual Household Income

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

³ Unless otherwise noted, Travel Behavior Inventory 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).

Figure 11 shows a comparison of the share of passengers on select routes with different household incomes from 2016 to 2021. A positive number for the “Less than \$15K” category indicates that a higher portion of passengers on routes where the 2021 survey was piloted have household incomes less than \$15,000 relative to 2016. No other income levels show an increased share. Note that there was an increase in respondents preferring to not respond (not shown in the figure). The \$60,000 to \$100,000 income category saw the largest decline from 2016 to 2021. Note that this data does not represent the entire Metro Transit service area, therefore unlinked trip-weighting factors are used in both datasets. Unlinked as opposed to linked trip-weighting factors are used as the pilot data is expanded to route-level boardings.

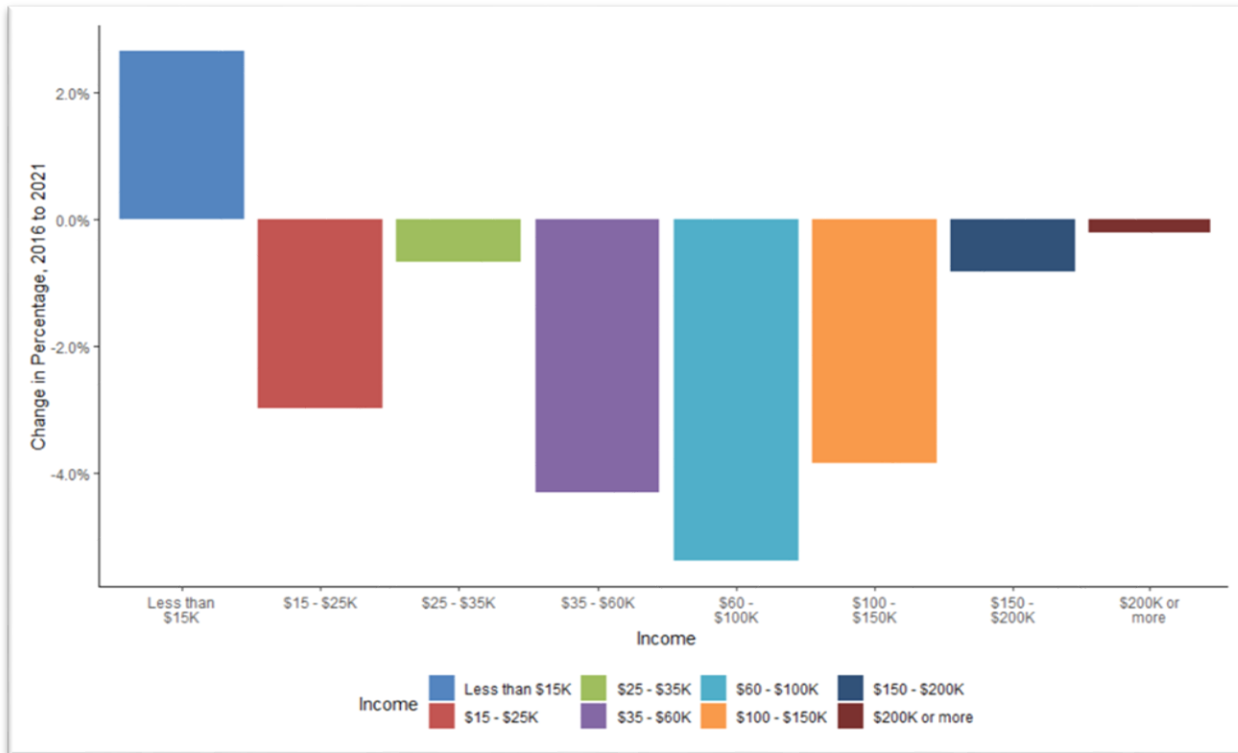
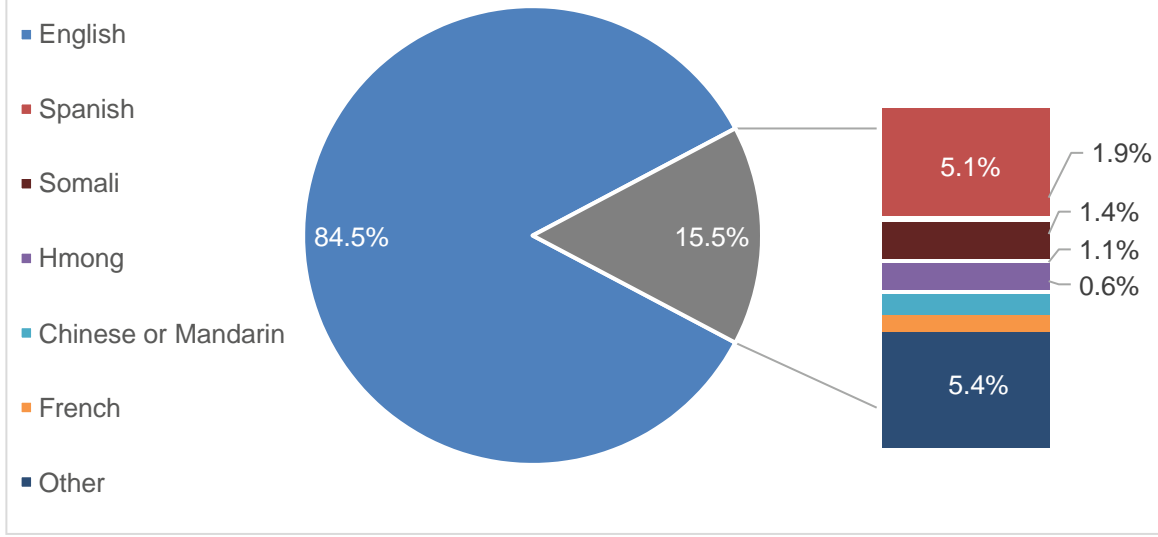


Figure 11: Change in Household Income on Select Routes, 2016-2021

Source: Metropolitan Council TBI Transit On-Board Survey, 2016 and Metropolitan Council TBI Transit On-Board Survey, 2021 Pilot.

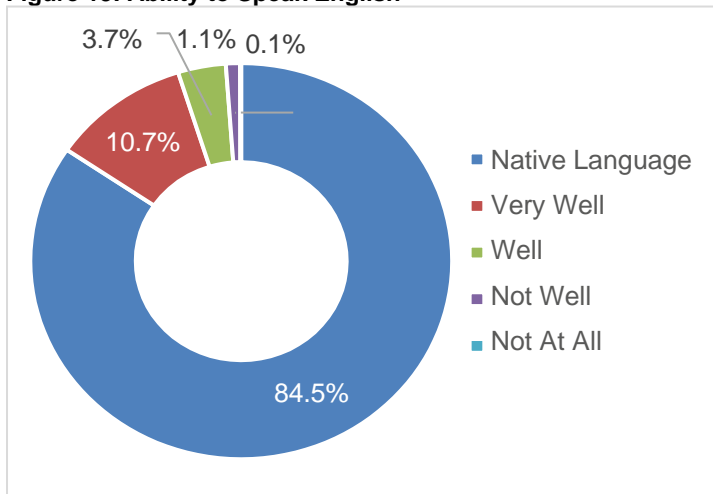
The survey shows 85% of Metro Transit customers speak English as their primary language at home (Figure 12). Spanish, Somali, and Hmong were the next most frequent languages. Among those customers who speak a language other than English in their home, most speak English well or very well (Figure 13).

Figure 12: Language Spoken at Home



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

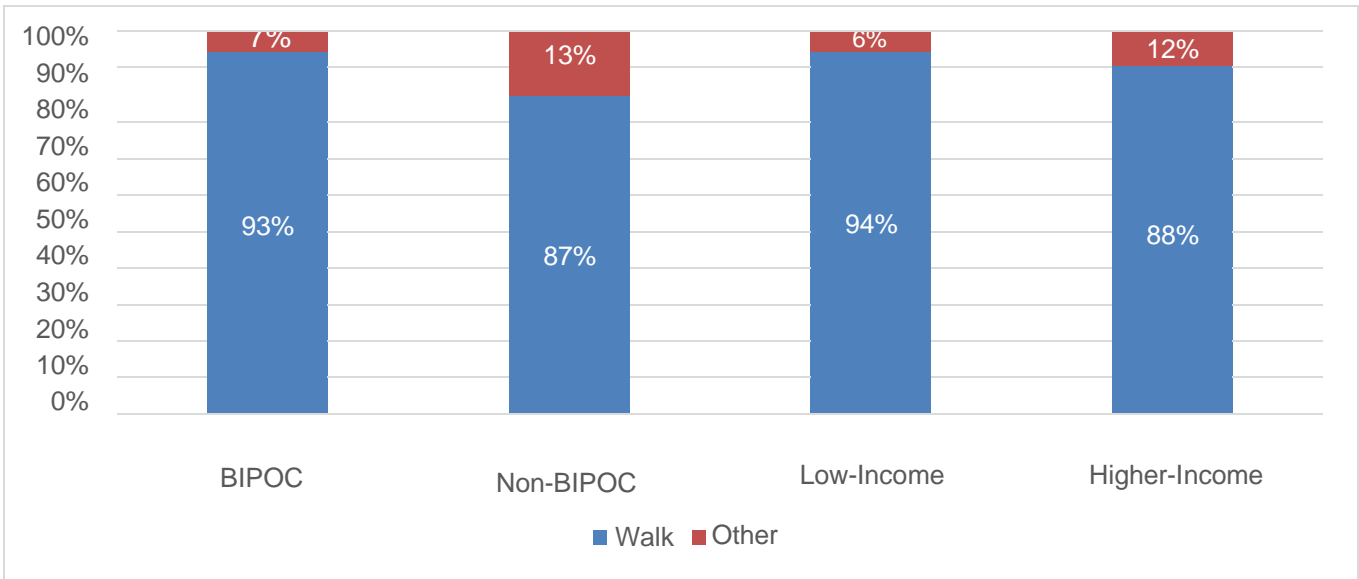
Figure 13: Ability to Speak English



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

Shown in Figure 14, most Metro Transit passengers walk to access transit. However, notable differences in access mode exist between BIPOC and non-BIPOC customers, and low-income and higher-income customers. BIPOC and low-income customers are both more likely to walk to access transit than their counterparts – by about six percentage points. Alternatively, non-BIPOC and higher-income customers are more likely to drive alone to access transit compared to BIPOC and low-income customers, respectively (Figure 15). Similar trends are observed for mode of egress from transit, as shown in Figure 16 and Figure 17.

Figure 14: Mode of Access



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

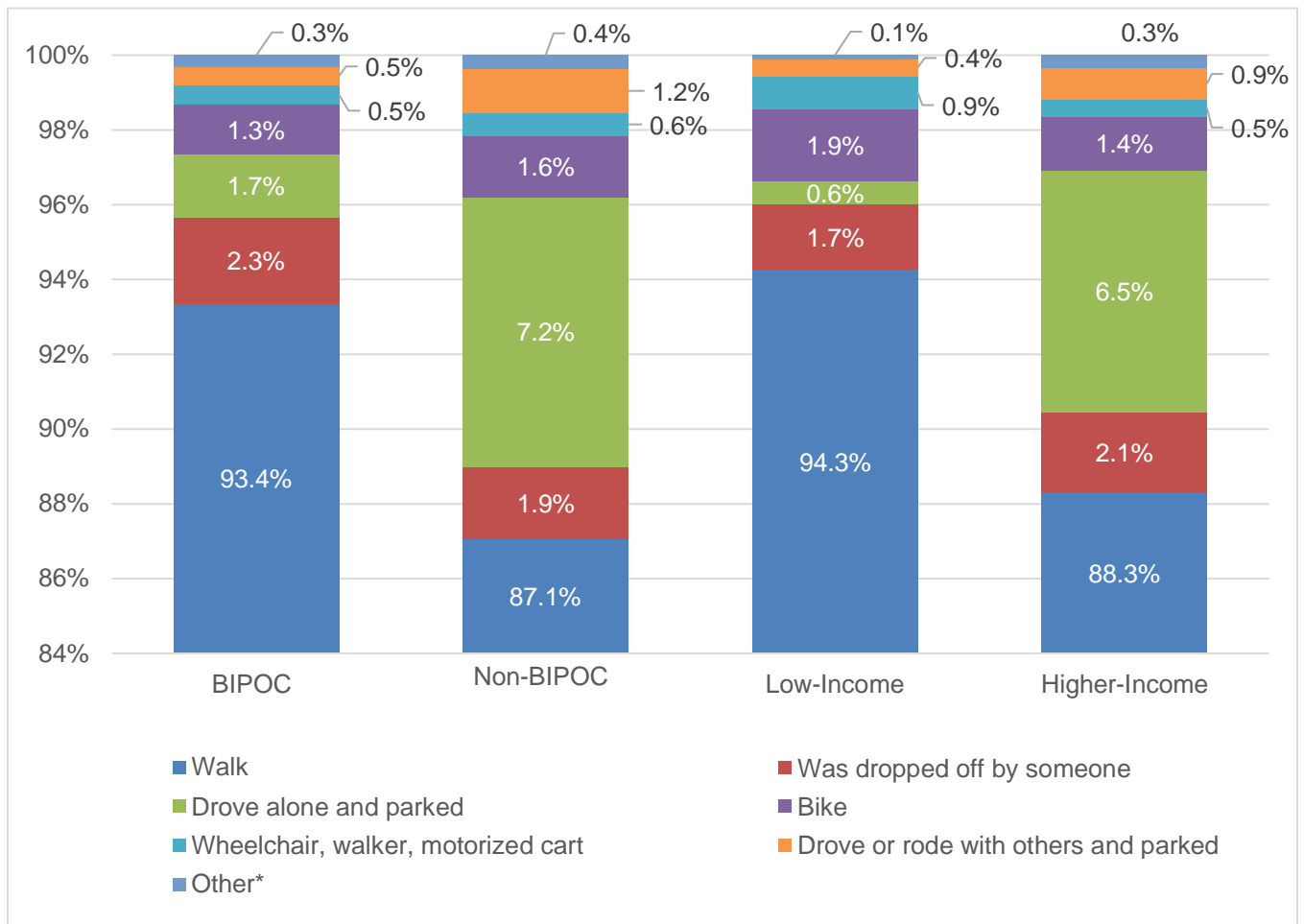
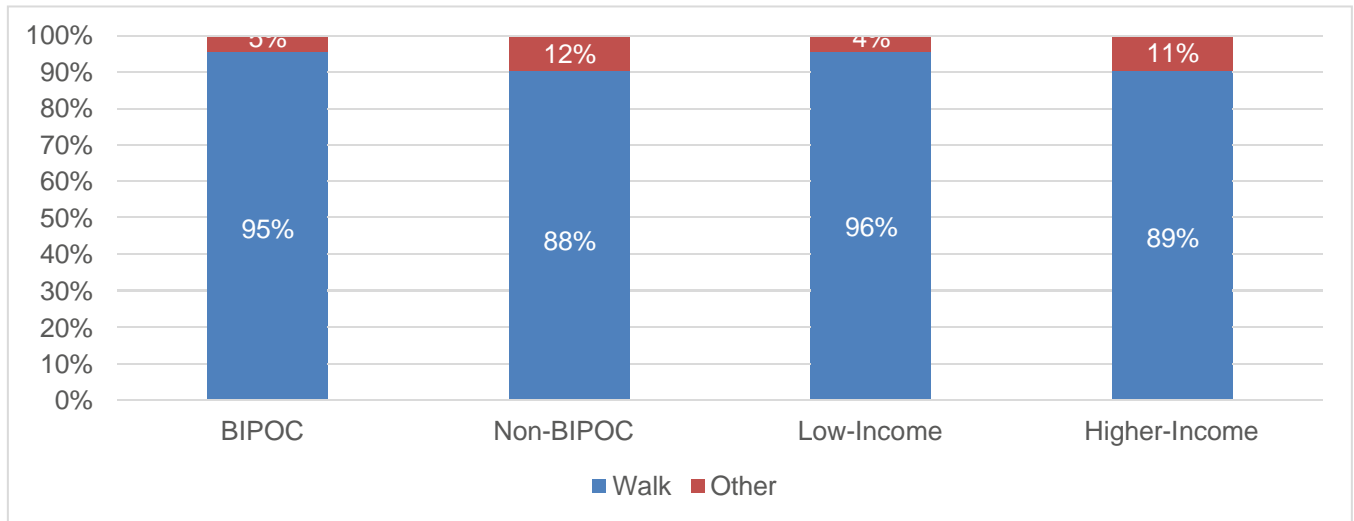


Figure 15: Mode of Access (Detail)

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

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

Figure 16: Mode of Egress



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

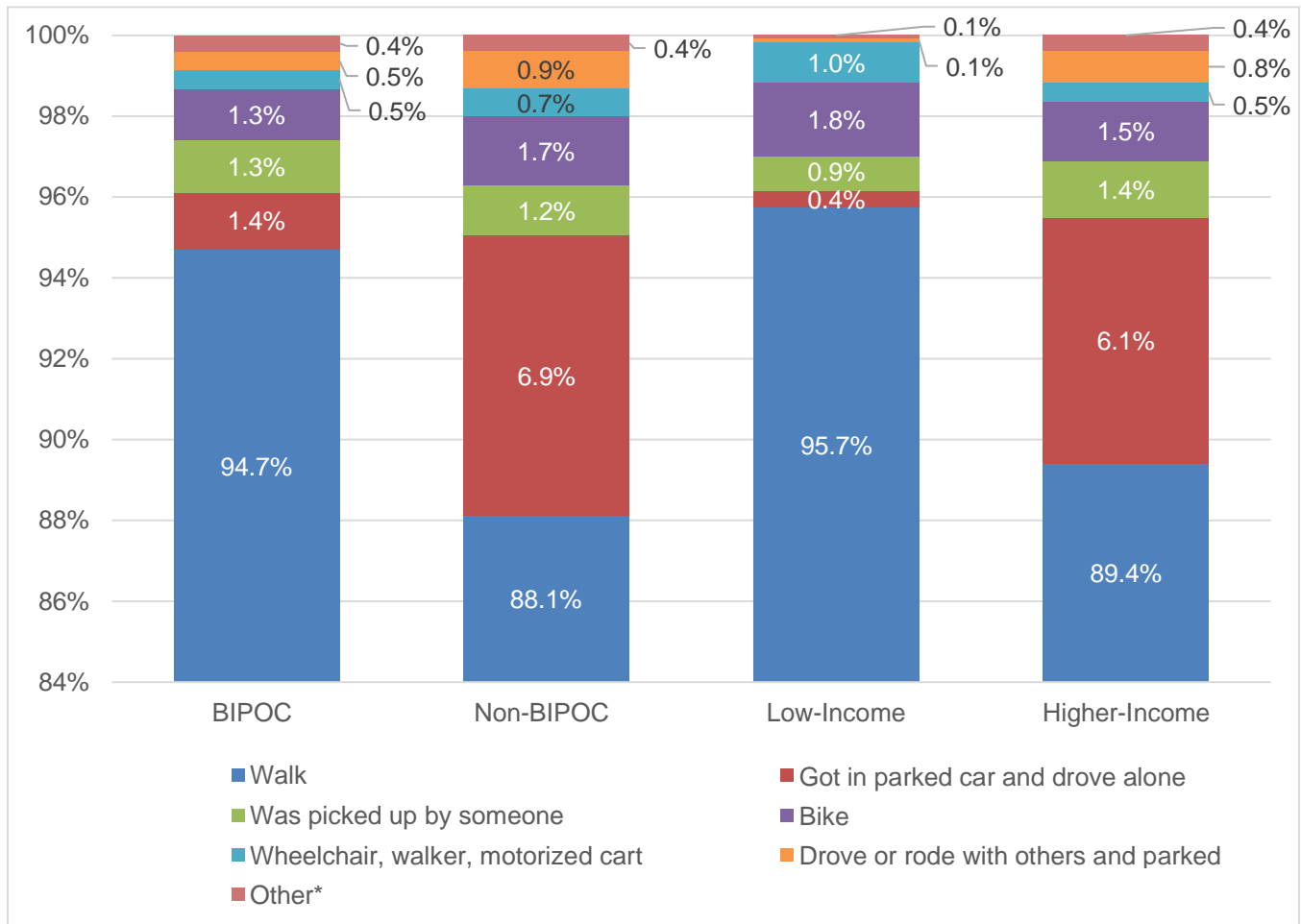


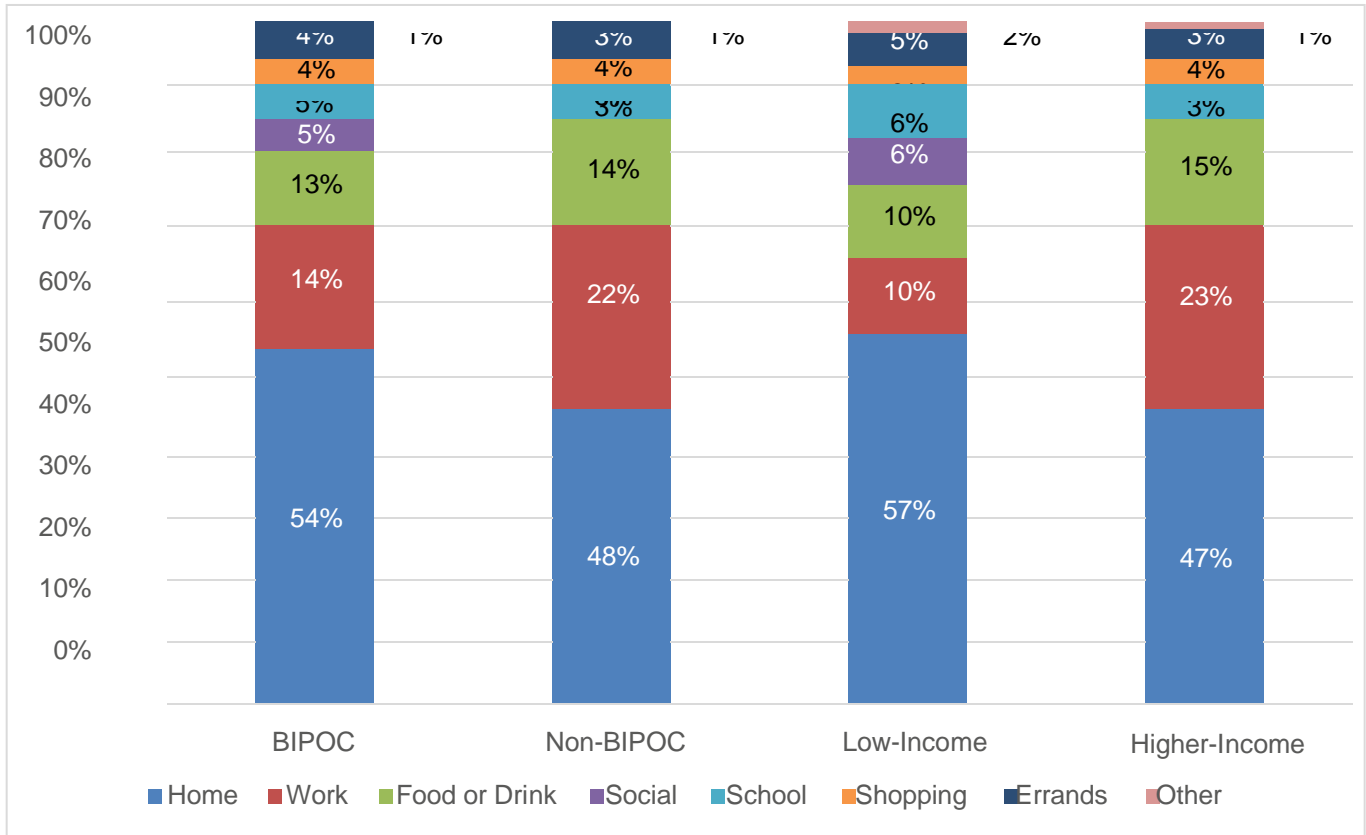
Figure 17: Mode of Egress (Detail)

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 18). Non-BIPOC and higher-income riders used transit more frequently for work than BIPOC and low-income riders, respectively.

Figure 18: Trip Purpose



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

Figure 18 shows how trip purpose on select routes has change from 2016 to 2021. The relative share of trips to home and for shopping and errands have increased. The relative share of trips to work decreased most significantly. The use of transit for work trips was less common for BIPOC and low-income populations in 2016 according to Figure 16. The increase in share of trips on select routes by BIPOC and low-income populations and decrease in share of trips made for work indicate that this trend is likely consistent in 2021.

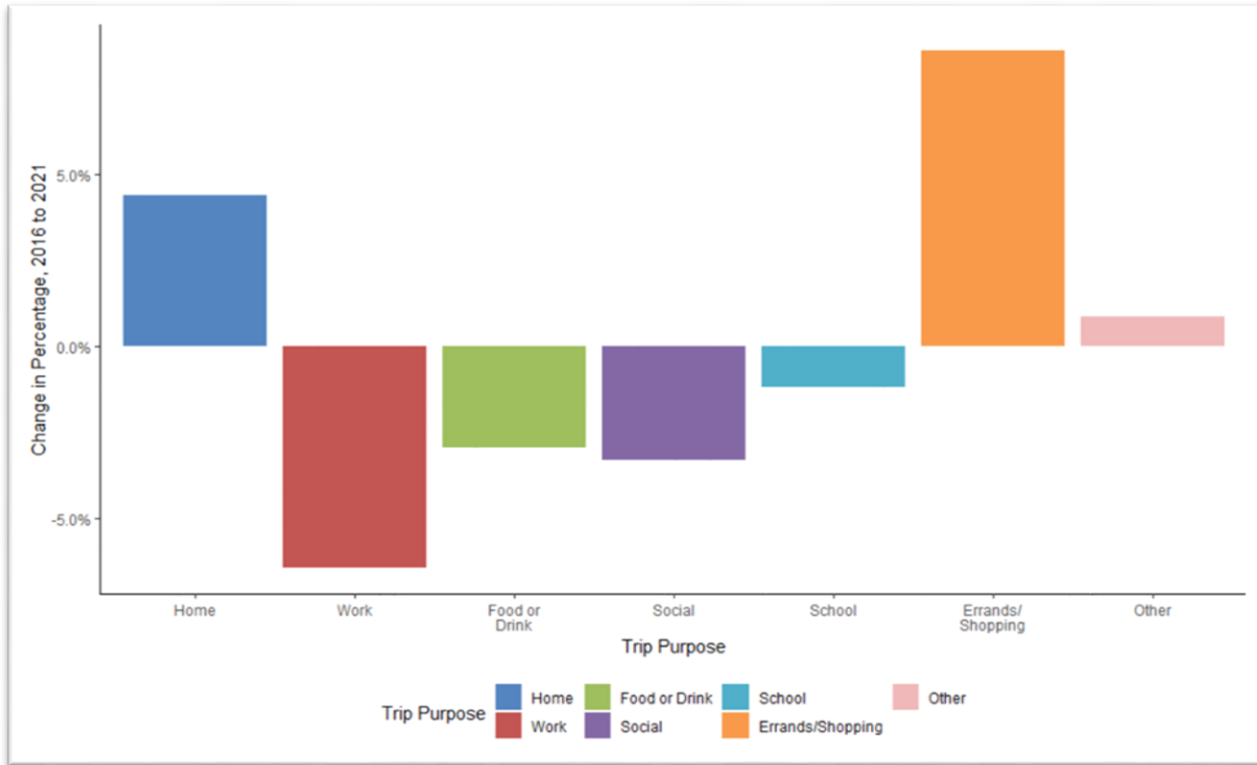


Figure 19: Change in Trip Purpose on Select Routes, 2016-2021

Source: Metropolitan Council TBI Transit On-Board Survey, 2016 and Metropolitan Council TBI Transit On-Board Survey, 2021 Pilot.

Both BIPOC and low-income riders are more likely to require at least one transfer to complete their trip than non-BIPOC and higher-income riders, respectively (Figure 20). Less than 5% of all customers require two or more transfers as part of their one-way transit trip.

Figure 21 shows the stark differences in rates of possessing a driver’s license between Metro Transit customers. More than half of BIPOC and low-income riders do not have a driver’s license. About one-quarter of non-BIPOC and higher-income riders do not have a driver’s license.

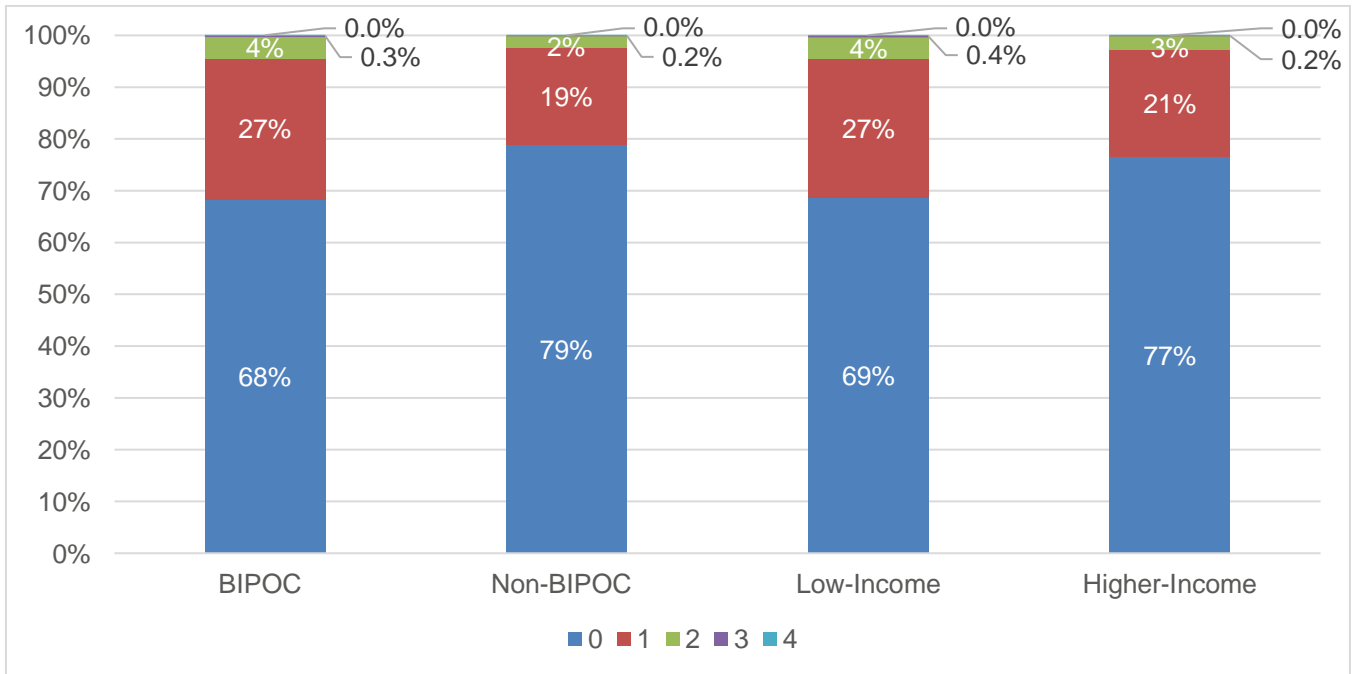
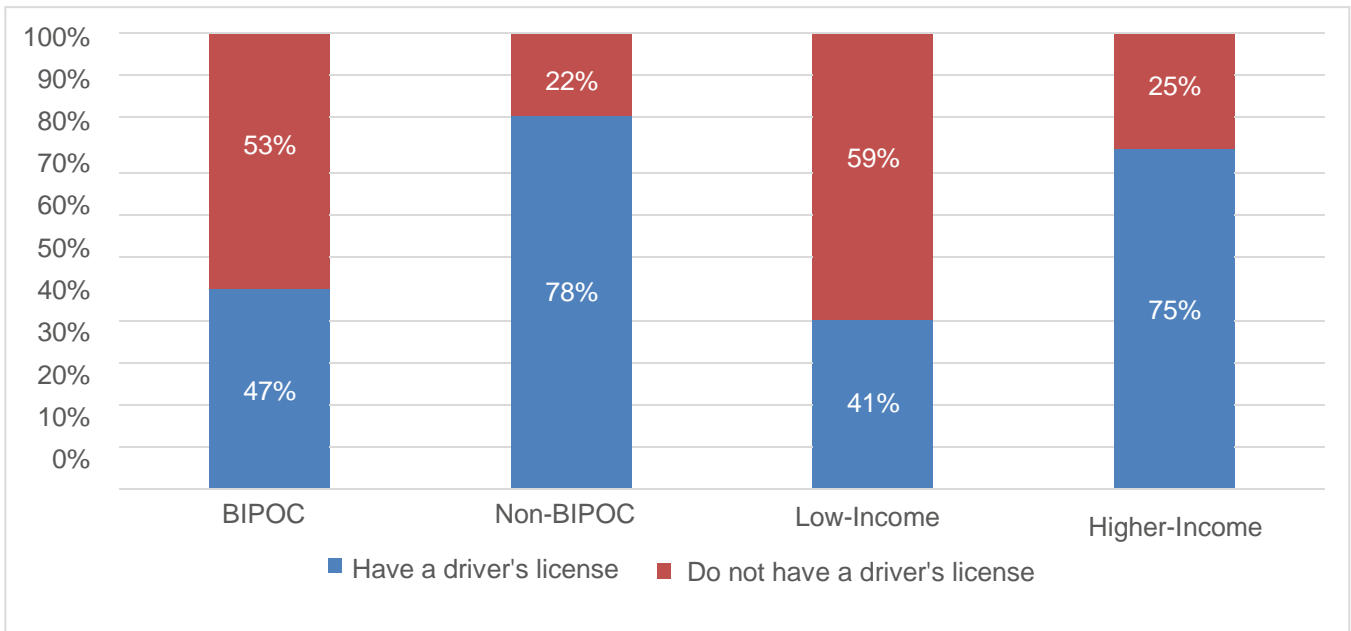


Figure 20: Number of Transfers per One-Way Trip

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

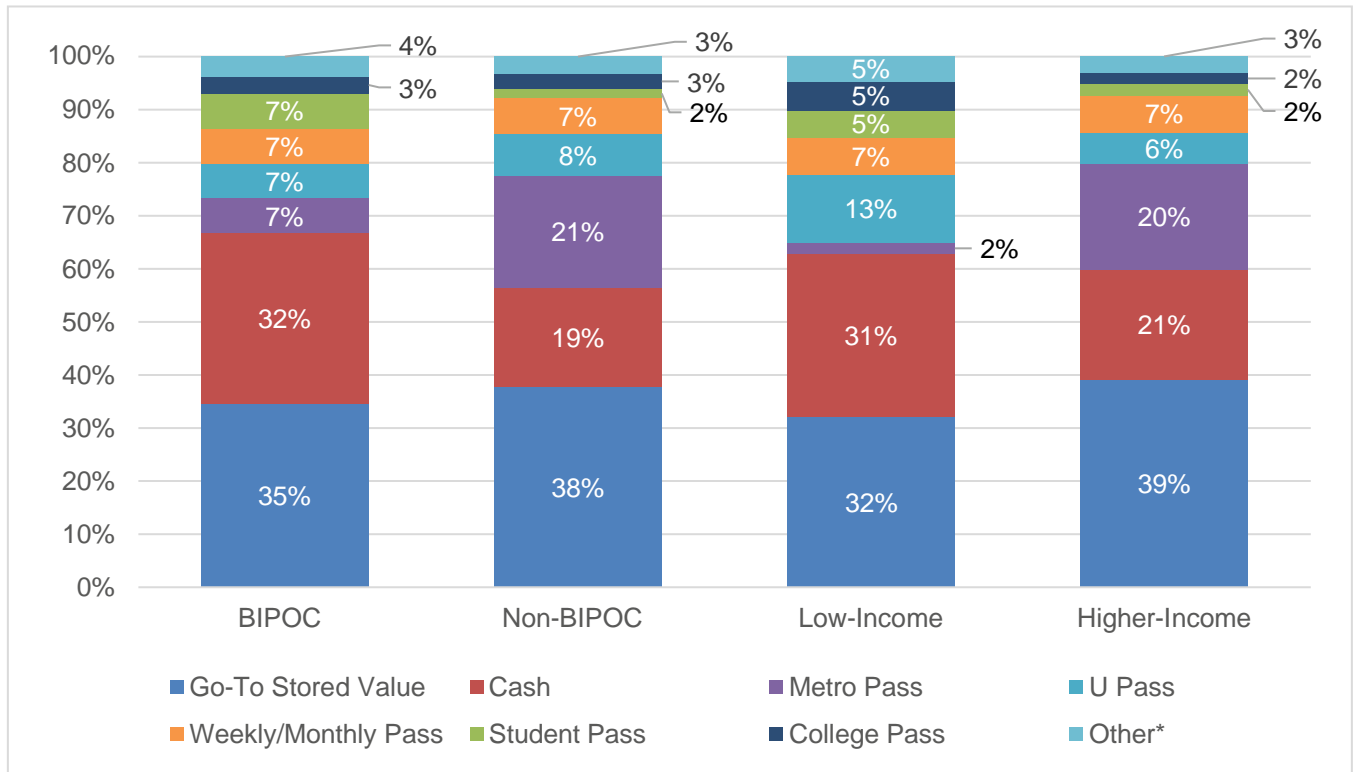
Figure 21: Riders with a Driver's License



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

When paying their fare, BIPOC riders are more likely to use cash than non-BIPOC riders (Figure 22); this pattern is similar based on income, with low-income riders using cash fare at greater rates than higher-income riders. Non-BIPOC riders are three times more likely than BIPOC riders to pay their fare using Metropass – a fare instrument provided to employees by companies and organizations; the difference is even greater based on income, with higher-income riders using Metropass at 10 times the rate of low-income riders.

Figure 22: Fare Payment Method

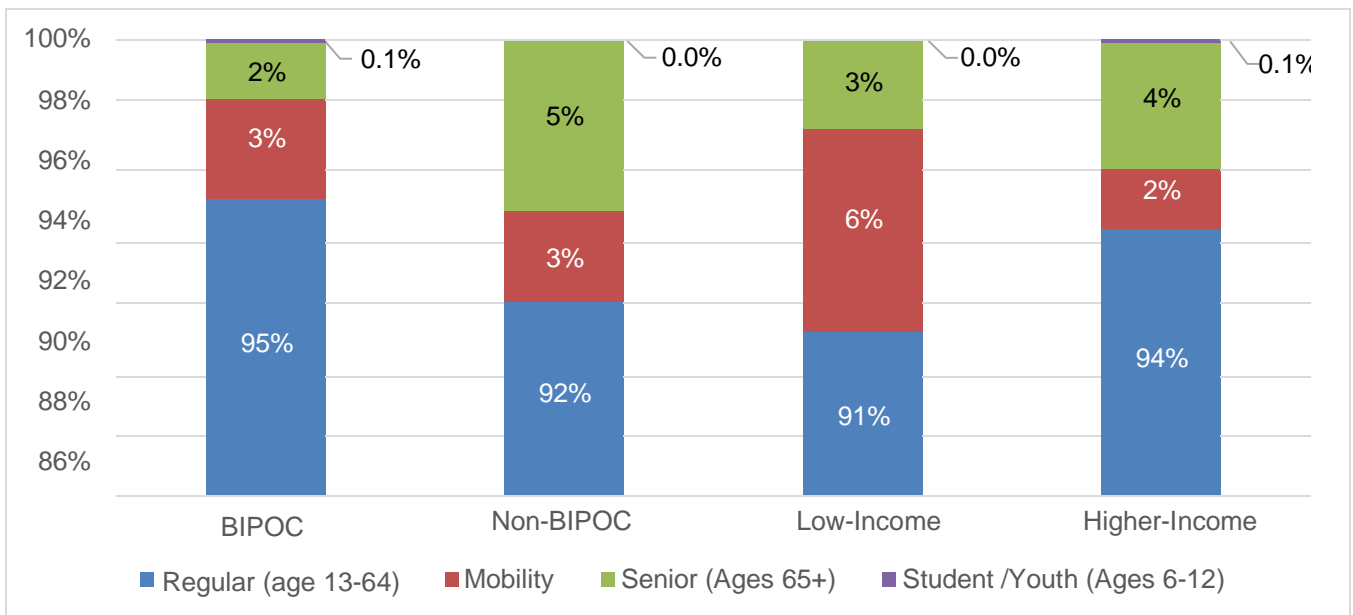


Source: Metropolitan Council TBI Transit On-Board Survey, 2016.

*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 23). Low-income passengers are more likely to purchase a mobility fare – available to persons who have disabilities – than people of higher incomes.

Figure 23: 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 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 BIPOC and low-income populations.

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 BIPOC 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 existing routes, one or more service changes resulting in at least a 25% change in the weekly 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 or branch without alternate fixed route
- e) 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, pandemics, staffing shortage 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 Policy

The Metropolitan Council will use a 10% difference as the threshold to determine if the effects of a proposed fare change, major service change, or triennial monitoring review of systemwide standards and policies shows evidence of a potential disparate impact or disproportionate burden.

If the effects borne by the BIPOC population, both adverse and beneficial, are not within 10% of the effects borne by the white population, then the proposed change would pose a potential disparate impact.

If the effects of a major service change borne by those of low-income, both adverse and beneficial, are not within 10% of the effects borne by those not of low-income, then the proposed change would

pose a potential disproportionate burden.

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

The Metropolitan Council's Disparate Impact/Disproportionate Burden policy does not consider a beneficial effect beyond 10% difference to BIPOC and low-income populations as evidence of Disparate Impact/Disproportionate Burden. The intent of Title VI is to ensure non-discrimination against BIPOC and low-income communities. Therefore, analysis that finds a beneficial effect for BIPOC and/or low-income communities would be documented as such and will not require the agency to analyze alternatives.

Public engagement

The Met Council's Disparate Impact/Disproportionate Burden policy was updated in 2022 after nearly 10 years. There was an extensive public engagement effort by the Metropolitan Council and Metro Transit staff in August 2022 prior to the Council approving the updated policy. The updated policy increased the threshold from 80% to 90% to better align this policy with agency transit equity efforts. Several engagement efforts were made during the 30-day engagement period:

- Engagement survey
- Updated the Metro Transit Title VI and Equity websites
- Updated the Metropolitan Council Title VI website
- Emailed organizations who were involved in engagement years past about the changes
- Emailed organizations who might be interested in the changes who did not participate in the past
- Shared engagement opportunities on various social media platforms

Comment summary

The Metropolitan Council directly engaged community organizations who had previously provided input into the disparate impact/disproportionate burden policy, as well as new community organizations and general transit riders and residents of the Twin Cities region. The Met Council received comment during the month of August 2022, hearing from two organizations and 15 individuals.

The survey was promoted widely on the Met Council's social media channels (111,000 followers across platforms), in its email newsletter (24,000 subscribers), and on the Met Council website (41,000 monthly visits).

Overall, individuals and organizations who responded were in favor of the proposed change, which would lower the threshold for further evaluation and mitigation from 20% to 10%. Several respondents also took the opportunity to identify additional concerns about the transit system overall.

The table below summarizes the comments received. One commenter identified herself in several racial categories, five commenters indicated they live with a disability, and two organizations represent people who identify as people of color. Of those who provided gender information, half were men and half were women.

Survey responses

Age	Gender	Race	Disability status	Topic, feedback
55-64	M	White	n/a	<ul style="list-style-type: none"> Support change to 10% recommend assessing a true relative standard
35-44	F	White	n/a	<ul style="list-style-type: none"> Support change to 10%
n/a	n/a	n/a	n/a	<ul style="list-style-type: none"> Concern about people not paying on transit
35-44	F	White	Yes	<ul style="list-style-type: none"> Concerned about overall ridership and balance between local and express service Concerned about shrinking Metro Mobility service area Supports low/reduced fares for low-income individuals
75-84	n/a	White	Yes	<ul style="list-style-type: none"> Concerns about cost burdens on low-income people and older adults on fixed incomes
35-44	F	White	n/a	<ul style="list-style-type: none"> Support change to 10%
55-64	n/a	White	Yes	<ul style="list-style-type: none"> Concern about low ridership routes – suggested ending those Fares should be higher to reduce other sources of revenue paying for transit Concern about people not paying on transit
25-34	F	White	n/a	<ul style="list-style-type: none"> Support change to 10%
n/a	n/a	n/a	n/a	<ul style="list-style-type: none"> Unsure how policy assesses low-income status (no contact information for follow-up)
55-64	M	n/a	n/a	<ul style="list-style-type: none"> Questioned the way trips are evaluated under the standards (no contact information for follow-up)
25-34	M	White	n/a	<ul style="list-style-type: none"> Support change to 10% Suggests increasing budget to support additional investigations and mitigation
85+	M	White	n/a	<ul style="list-style-type: none"> Questioned how data is analyzed to include low-income individuals (regardless of race) Transit system should serve everyone equally Transit system needs to be safe 24/7 We can't have safe, well-funded transit if people are riding free
55-64	F	Black, Latinx	Yes	<ul style="list-style-type: none"> Support change to 10% Supports lower fare programs for people between low-income and middle class, especially given high cost of living
55-64	F	White	Yes	<ul style="list-style-type: none"> Support change to 10%
65-74	M	White		<ul style="list-style-type: none"> Questions about the purpose of the evaluation process (no contact information for follow-up)

Organizational responses

Minnesota Council on Latino Affairs

"I don't have any feedback, but think that this ratio analysis is pointing in the right direction in order to comply with Title VI."

Saint Paul NAACP

"We are thrilled to have had some influence on this much-improved policy."

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 BIPOC, non-BIPOC, 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 BIPOC/low-income and non-BIPOC/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.

When appropriate, additional analysis may be performed to supplement the official service equity analysis, such as evaluating how a proposed change impacts the number of jobs (or other destinations) accessible within a certain period using transit. This may also include data from the regional Travel Behavior Inventory, which is based on on-board rider surveys instead of census data. If TBI data is taken into consideration, then the comparison population will be adjusted accordingly.

Fare equity analyses

Fare equity analyses use a survey-based approach to measure the relative impact of proposed fare changes on BIPOC, non-BIPOC, 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 BIPOC, non-BIPOC, low-income, and non-low-income riders. The 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 2019 and July 2022 (Table 5). In each evaluation, the proposed change was found to have no potential for disparate impact to BIPOC populations or disproportionate burden to low-income populations. These equity analyses and documentation of approval are shown in Attachment G.

Table 5: Equity Analysis Results

Equity Analysis Project	Potential for Disparate Impact	Potential for Disproportionate Burden
Fare Simplification (2022)	No	No
Route 63/323 (2020)	No	No
Orange Line Connecting Bus (2021)	No	No
D Line and Local Routes Corridor (2022)	No	No

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 region’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 Met 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 Transportation Policy Plan defines unique transit market areas based on a combination of population density, employment density, automobile

availability, and intersection density (Table 6).

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 6: 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. 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. 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 7. 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 more than 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% or more of the time (two weekdays per five weekdays).

Vehicle load data are continuously collected aboard buses using automatic passenger counter 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 7: Vehicle Loading Standards

Route Type	Bus Type	Peak Load Standard	Off-Peak Load Standard
Core Local	`	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

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 8 displays the recommended minimum headway by route type and market area.

Table 8: 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 equipment aboard vehicles. The supervisory control and data acquisition 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 one minute early and five minutes late.
- **LRT and Commuter Rail** service is considered on-time if it arrives at stations between one minute early and five 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 2021, found that about 82%, 78%, and 94% of trips were on time for bus, LRT, and commuter rail service, respectively, on average.

Service availability

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 9 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 9: 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 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 10 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 10: 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 11, 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 BIPOC and non-BIPOC populations and between low-income and non-low-income populations.

Table 11: 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 12.

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 12: Customer Amenities at Transit Stops

Amenity	Types of Transit Stops		
	METRO (LRT, BRT) & Commuter Rail Stations*	Transit Centers	Bus Stops
Stop information, including route(s), stop number, and accessing NexTrip real-time information	Standard feature	Standard feature	Standard feature
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 getting off 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.

***Based on the Guidelines for Real-Time and Electronic Signs, the criteria for selecting sites for real-time signs include (1) nature of service, (2) ridership, and (3) equity.

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 or 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 depots and one commuter rail depot. Many routes are operated out of multiple garages and serve a large geographic area. For regional, contracted fixed routes, the Metropolitan Council owns the buses and leases them to the operating contractor under a master vehicle lease.

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.

Commuter coach buses

Coach buses are prioritized for 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 local routes and express 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.

Hybrid buses

Through agreement with the City of Minneapolis, routes operating on Nicollet Mall in downtown Minneapolis are prioritized for hybrid buses, pending loading standards. Hybrid buses are also prioritized on some of the busiest local routes in Saint Paul serving primarily BIPOC and low-income communities.

Articulated buses

Prior to the COVID-19 pandemic 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. As of mid-2022 many articulated buses are being used on local routes at all times of day to provide additional capacity. 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 Orange and C Lines use articulated BRT buses. These buses have no farebox, are specially marked to help brand BRT routes and have fewer seats to allow for better passenger circulation. BRT buses assigned to the Orange Line are diesel buses, but the buses assigned to the C Line are a mix of diesel and electric, depending on the trip. Electric buses are assigned only to the METRO C Line due to the location of on-route charging infrastructure at the Brooklyn Center Transit

Center. The METRO D Line will use diesel articulated BRT buses like those on the Orange Line when it opens in late 2022.

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 whenever possible; 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. Sequential numbers: Sequentially numbered groups of buses are kept together whenever possible to ease administrative tracking.
7. Propulsion: Electric buses are currently assigned to Heywood Garage because this garage is equipped with charging infrastructure. The new North Loop Garage, scheduled to open in 2023, will also have charging infrastructure for electric buses.

Private provider fleet management

Metropolitan Transportation Services 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. Met Council-owned, contractor-operated vehicles are used for Metro Mobility, Transit Link, and contracted fixed routes.

The contractor can assign any bus to any route if 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 automatic passenger counters, Metropolitan Transportation Services stipulates within the operating contract that vehicles must be rotated among operators and work pieces to ensure all trips have at least some automatic passenger counter coverage.

Title VI evaluation

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

Service monitoring evaluation

The most recent service monitoring evaluation was completed in late 2021. Each of the service standards and policies described in the preceding section were evaluated to ensure an equitable distribution of service between BIPOC 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 13.

The most recent service monitoring evaluation revealed no disparate impact or disproportionate burden.

Table 13: Service Monitoring Summary

Standard/Policy	BIPOC	Low-Income
Vehicle load	No disparate impact	No disproportionate burden
Vehicle headway	No disparate impact	No disproportionate burden
On-time performance	No disparate impact	No disproportionate burden
Service availability	No disparate impact	No disproportionate burden
Route spacing	No disparate impact	No disproportionate burden
Midday service	No disparate impact	No disproportionate burden
Stop spacing	No disparate impact	No disproportionate burden
Distribution of amenities	No disparate impact	No disproportionate burden
Bus stops	No disparate impact	No disproportionate burden
Transit centers	No disparate impact	No disproportionate burden
Stations	No disparate impact	No disproportionate burden
Vehicle assignment	No disparate impact	No disproportionate burden

Title VI is one piece of the broader strategic framework that Metro Transit uses to meaningfully advance equity in the region. Broader equity work, including additional quantitative analysis, is ongoing and continuous at Metro Transit. Equity is not achieved through one sole program, project, policy, or procedure, but in the integration of equity work throughout the agency.

Despite the lack of actionable Title VI findings from this study, Metro Transit continues to evaluate its service and improve equity of inputs and outcomes and will continue to evaluate service for disparate impact and disproportionate burden outside of triennial FTA Title VI service monitoring.

Part 3: Metropolitan Planning Organization requirements

As the Metropolitan Planning Organization 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 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.

A Metropolitan Planning Organization is a federally designated, 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 Metropolitan Planning Organization 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 Met Council's 17-member policy board is the designated Metropolitan Planning Organization's decision-making board; it works closely with the Transportation Advisory Board for the purposes of allocating federal funds through the Regional Solicitation process. The Transportation Advisory Board consists of 34 members who are local officials, as required by state law, and advises the Council on transportation-related issues. Table 2 depicts the racial composition of the Transportation Advisory Board and its Technical Advisory Committee.

Planning area demographics

Figure 24 displays the share of BIPOC population by census tract within the metropolitan planning area. Nearly 800,000 (25.8%) of the approximately 3.1 million people in the planning area identify as either non-white or Hispanic or Latino (i.e., BIPOC). The BIPOC population in the 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 BIPOC populations exist throughout the region (Figure 24).

Low-income populations by census tract within the planning area are shown in Figure 25. In the aggregate, 9.7% of the planning area population is 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%.

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 24: BIPOC Population within the Metropolitan Planning Area

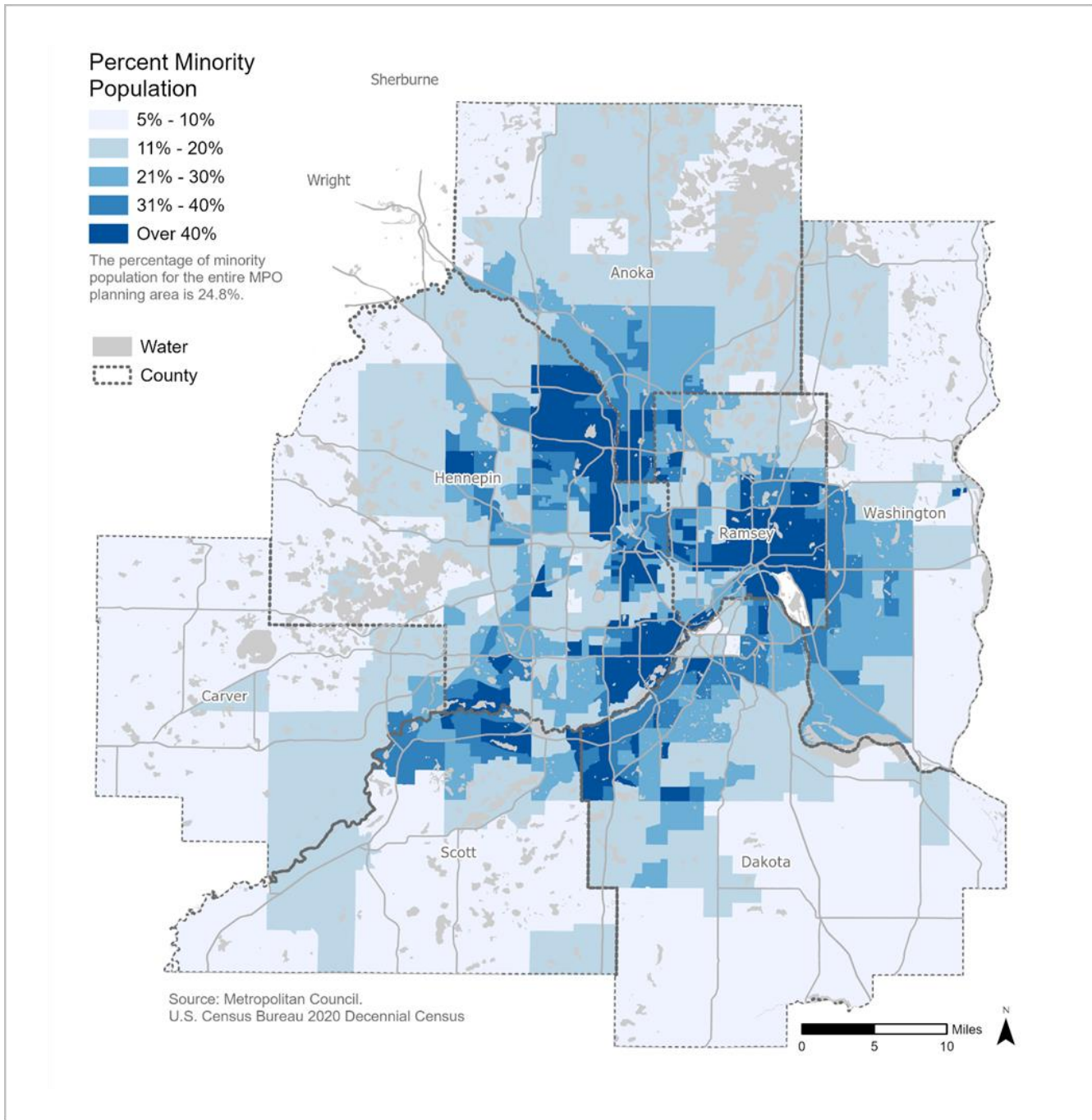
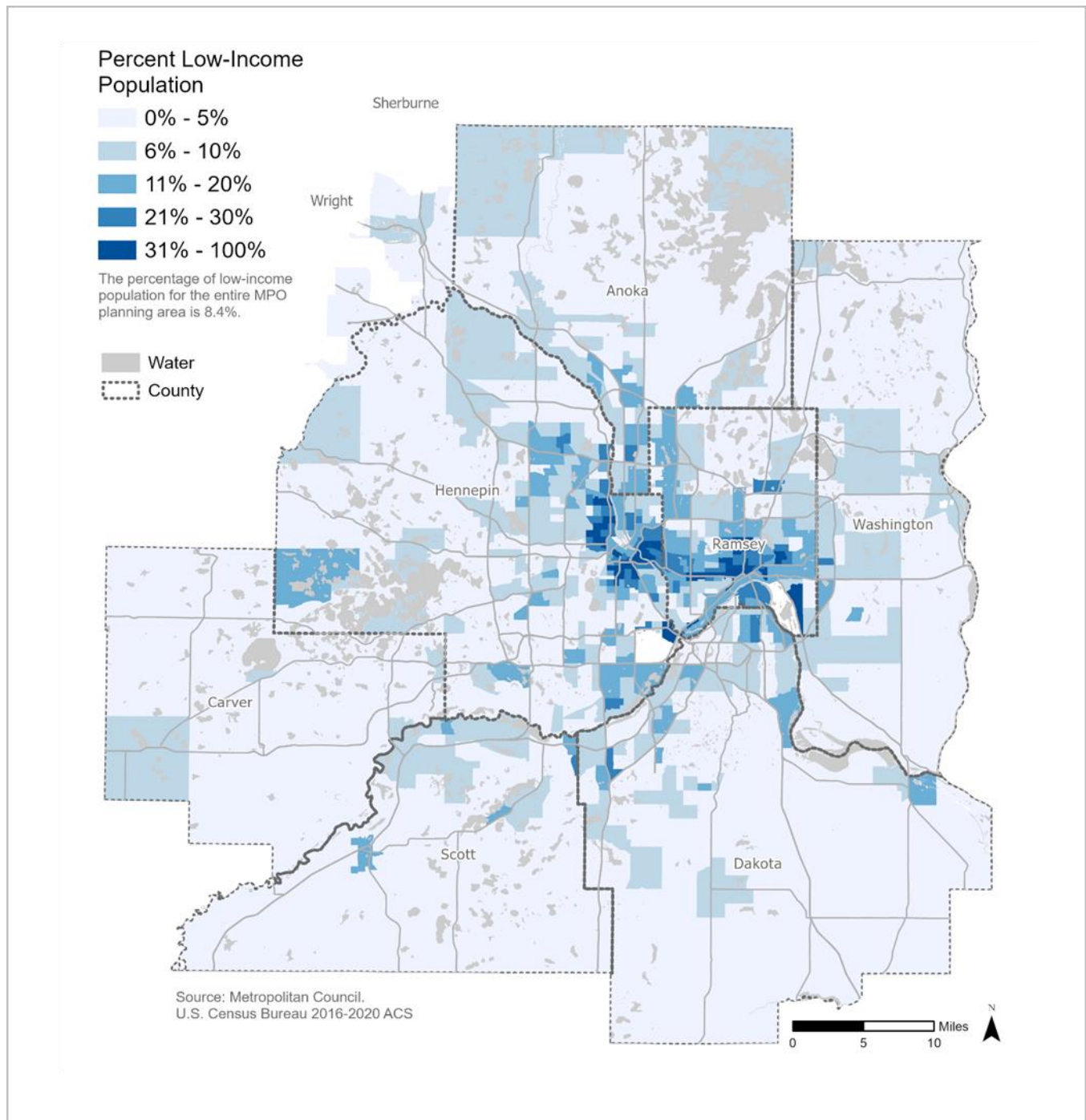


Figure 25: Low-Income Population within the Metropolitan Planning Area



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 2040 Transportation Policy Plan. The Transportation Policy Plan addresses Title VI and environmental justice in part by providing a location analysis of low-income and BIPOC 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 Addendum to the Public Engagement Plan (Attachment D) also includes a detailed discussion of the public participation process, including the methods employed to involve traditionally under-served populations including BIPOC, low-income, and limited English proficient 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 Metropolitan Planning Organization for the region, the Met Council approves federal funding through a process known as Regional Solicitation. The Regional Solicitation includes criteria that directly address 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 Met Council's role in assuring that transportation investments do not result in disparate impact or disproportionate burden to minority populations and low-income residents, respectively.

Distribution of state and federal funds

The Metropolitan Council, as the Metropolitan Planning Organization, 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 metropolitan planning area was analyzed using funding levels for transit projects included in the Metropolitan Council's 2022-2025 Transportation Improvement Plan (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 Congestion Mitigation and Air Quality and Surface Transportation Block Grant program funds. More information about the sources and uses of these funds is available in the Met Council's [2022-2025 Transportation Improvement Plan](#).

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.

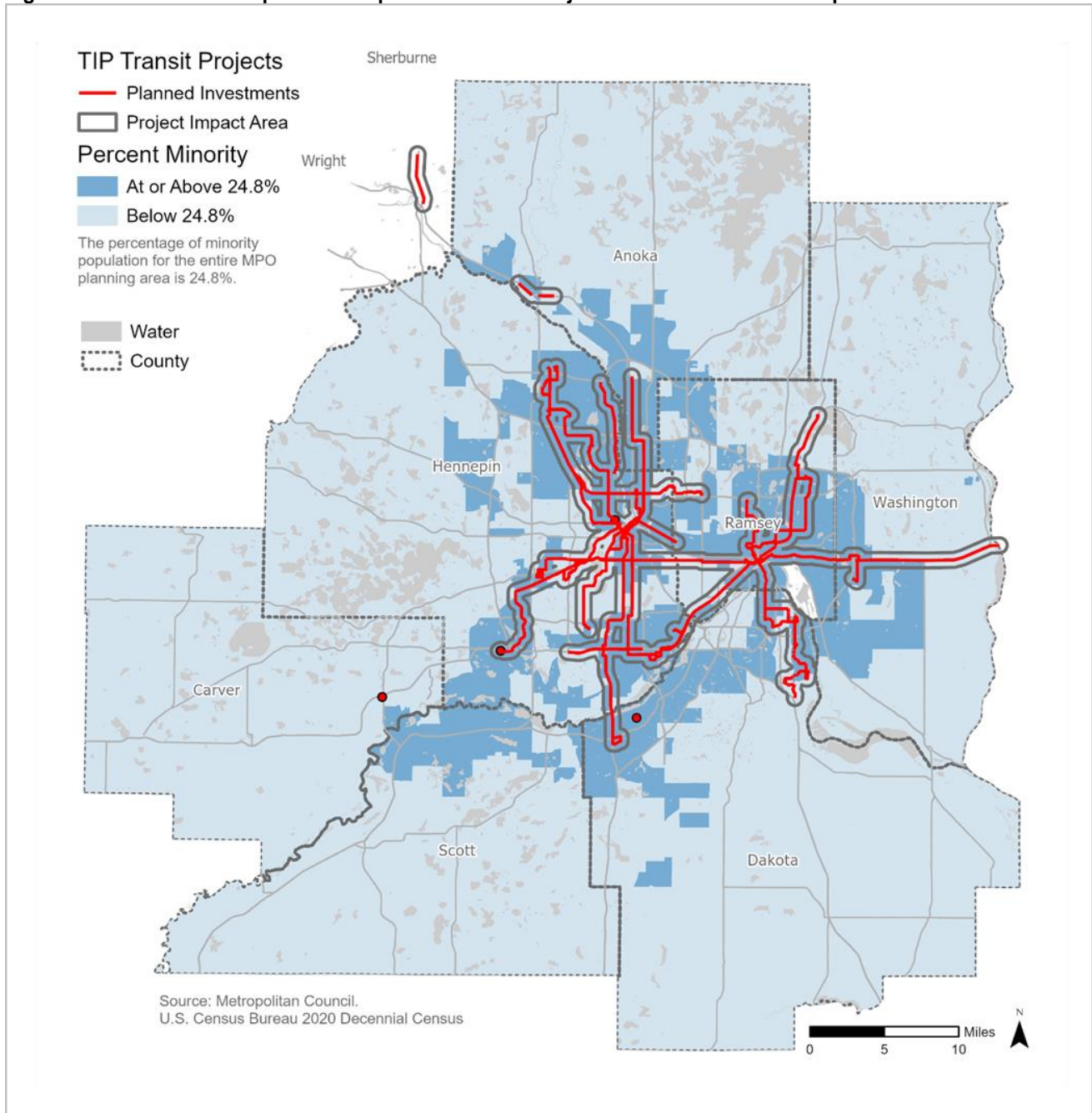
Where applicable, each public transportation project in the 2022-2025 Transportation Improvement Plan was assigned a service area, which was overlaid on census tracts. Many census tracts in the MPO planning area are not impacted by any transit projects, while many are impacted by multiple projects. The funding amounts associated with 2022-2025 Transportation Improvement Plan public transportation projects were then summed for each census tract.

Each census tract was defined as predominantly BIPOC or predominantly non-BIPOC; predominantly BIPOC census tracts are those with BIPOC population greater than the MPO planning area average, which is 25.8%. To assess the potential for disparate impacts to BIPOC populations, the average

amount of project funding impacting predominantly BIPOC census tracts was compared to that of predominantly non-BIPOC census tracts, and the Metropolitan Council's disparate impact policy was applied.

The Met Council's disparate impact policy states that benefits provided to BIPOC populations be at a rate at least 90% of the benefits being provided to non-BIPOC populations; failure to meet this threshold is evidence for potential disparate impact to BIPOC populations.

Figure 26: 2022-2025 Transportation Improvement Plan Projects and Percent BIPOC Population



Results

Results of the funding distribution analysis are displayed in Table 14 and Table 15. There are 828 census tracts in the metropolitan planning area; on average, they receive approximately \$80.1 million of project funding from 2022-2025 Transportation Improvement Plan transit projects (Table 17). Within the metropolitan planning area, there are 251 predominantly BIPOC tracts; on average, they had \$135.2 million in funding investment – roughly three times greater than predominantly non-BIPOC tracts (\$56.2 million).

The ratio between predominantly BIPOC tracts and predominantly non-BIPOC 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 BIPOC populations.

Table 14: 2022-2025 Transportation Improvement Program Funding Distribution by Predominantly BIPOC and Non-BIPOC Areas (full metropolitan planning area)

Census Tracts in Metropolitan Planning Area	Average Cumulative Project Funding	Comparison Index
All tracts (n=828)	\$80,127,120	
Predominantly BIPOC (n=251)	\$135,188,735	2.41
Predominantly non-BIPOC (n=577)	\$56,174,840	

Not all census tracts in the metropolitan planning area are served by transit. The analysis was repeated to include only census tracts impacted by projects receiving funding for public transportation purposes (301 tracts, 36.4% of metropolitan planning area tracts), based on the 2022-2025 Transportation Improvement Plan.

On average, predominantly BIPOC tracts impacted by a 2022-2025 TIP transit project received approximately \$212 million, while predominantly non-BIPOC tracts received \$229 million (Table 18). The resulting funding ratio of 0.92 is above the four-fifths threshold of 0.8. As in the first analysis, the results suggest no disparate impact to BIPOC populations from the distribution of state and federal funding for public transportation purposes.

Table 15: 2022-2025 Transportation Improvement Plan Funding Distribution by Predominantly BIPOC and Non-BIPOC Areas (Project Areas)

Census Tracts in MPO Planning Area with Projects	Average Cumulative Project Funding	Comparison Index
All (n=301)	\$220,416,130	
Predominantly BIPOC (n=160)	\$212,077,328	0.92
Predominantly non-BIPOC (n=141)	\$229,878,599	

Distribution of FTA funds to subrecipients

As the Metropolitan Planning Organization 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 and New Freedom, which have now expired. The Metropolitan Council, through the Transportation Advisory Board, continues to allocate congestion mitigation and surface transportation grant 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. Criteria and measures may differ somewhat in each round of the Regional Solicitation as stakeholders provide feedback and changes are evaluated after each funding round. In the 2022 Regional Solicitation, the criteria included equity and affordable housing with three measures: the first asked applicants to address engagement for the project with Black, Indigenous, and people of color populations, low-income populations, disabled populations, and youth or older adults; the second measure asked applicants to describe benefits for these population groups along with any negative project impacts and proposed mitigation; and the third measure evaluated project benefits to current and future affordable housing residents within a half-mile of the project. Summaries of each Regional Solicitation round are maintained on the Council's web site, including awarded projects, original applications, and project scores. Figure 26 includes projects receiving funds through the Regional Solicitation process. More details about the process can be found on the Metropolitan Council [Regional Solicitation](#) page.

Attachment A: Title VI notices

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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 Mục VI.

Metropolitian 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 xariirta faquuqa, ama si aad wax badan uga ogaato waxyaabo ku saabsan waajibaadyada Title VI.

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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 peb kom ua ntaub ntawv tsis txaus siab, los sis yog xav paub ntxiv txog cov tes dej num ntawm txoj cai Title VI.

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

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



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.

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 Mục VI.

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 xariirta faquuqa, ama si aad wax badan uga ogaato waxyaabo ku saabsan waajibaadyada Title VI.

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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 peb kom ua ntaub ntauv tsis txaus siab, los sis yog xav paub ntiv txog cov tes dej num ntawm txoj cai Title VI.

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TitleVIComplaints@metc.state.mn.us



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 Addendum to the
Public Engagement Plan**

TRANSPORTATION ADDENDUM TO THE METROPOLITAN COUNCIL PUBLIC ENGAGEMENT PLAN

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 Met 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 Met 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.

Federal regulations

This plan is also responsive to the guidance provided in federal law ([23 §CFR450.316](#)) requiring Metropolitan Planning Organizations to develop a participation plan that defines a process for providing community members and other affected parties with opportunities to participate in the metropolitan transportation planning process.

State coordination

This plan aims to coordinate efforts between the Met Council and the State of Minnesota in statewide transportation planning public involvement and consultation processes. State and regional participation processes together should facilitate discussion and dialogue about transportation impacts on the natural and built environments.

State of emergency

In a state of emergency, like the COVID-19 pandemic, the Met Council will follow guidance from the State of Minnesota. If possible, meetings to conduct essential business will continue. Met Council facilities may be closed to the public and official business meetings may be conducted remotely, under Minnesota Statute, section 13D.021. Where possible, meetings will be streamed live and recorded. Alternatives will also be offered, when necessary. Public engagement and outreach may also switch to online and other contactless methods to provide public participation as the circumstances warrant.

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 Met 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 Met 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

Transportation stakeholder engagement

The Met 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.

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

- Transportation system users – including people who drive, ride bikes, walk, roll, and use transit
- Elected officials and staff of counties, cities, and townships. The state and its public agencies including the Minnesota Departments of Transportation, Public Safety, Health, and Human Services, the Minnesota Pollution Control Agency, and the Metropolitan Airports Commission,
- Freight interests including ports, shippers, and freight transportation services
- Business interests (employers and employees)
- Other transit agencies that provide service in the region
- Organizations that support the interests of and advocate on behalf of transportation in the region like corridor coalitions, the Suburban Transit Association, Transportation Management Organizations, bicycle organizations, and many more
- Organizations that focus on equity and social justice, representing people who have historically been underrepresented in transportation planning and policy including people of color and other racial and ethnic groups, people who have a disability, and people who have low incomes.

The Met Council will engage with local governments and other organizations that represent rural, suburban, and urban parts of the region related to land use and transportation system planning in those areas.

Engaging historically underrepresented groups

Those who have not been historically engaged in policy conversations with the Met Council will be intentionally included in engagement. Outreach activities will actively seek out the involvement of these communities to encourage involvement and feedback.

Historically underrepresented groups include, but are not limited, to “the elderly, citizens reentering public life after incarceration, people with limited access to the internet or with limited computer literacy, immigrants, homeless people, people with physical and mental disabilities, people with low incomes, people working several jobs or working during nontraditional hours, and people who are English-language learners. Moreover, rising levels of racial inequality and income inequality is a contributing factor to unequal access to public power (Holley 2016).

The COVID-19 pandemic may have expanded that list to include people who have had to take on additional child care, work, or schooling responsibilities to support their family and people who have lost their jobs, become food insecure, or become housing instable" (Urban Institute).

Building new relationships among these groups is an ongoing effort. At the same time, it is important to leverage established relationships to nurture long-lasting connections.

Outreach and engagement efforts need to be intentional and responsive to the needs of each group, meeting people where they are at and communicating in understandable ways. Traditional methods of collecting data like surveys and public comment periods are embedded in white culture and may not be the best strategies to engage historically underrepresented groups. Also, whenever possible, engagement staff should be representative of the population they are engaging.

Tribal Outreach

The seven-county metropolitan area geographically includes property owned by two of the 11 federally recognized Tribal Nations in Minnesota – the Shakopee Mdewakanton Sioux Community and the Prairie Island Indian Community. Although, the Met Council also values the unique relationship with all tribal communities living in the Twin Cities metropolitan region, as well as those living outside the region who have a relationship with tribal land, and sacred or cultural sites that extend beyond the geographical boundaries of tribal-owned land.

In 2019, the Met Council adopted a government-to-government tribal relations policy in accordance with the [Governor Tim Walz's Executive Order 19-24](#) ordering identified agencies to establish a tribal consultation policy, which was codified into law during the 2021 special session. The rationale for such a policy is that meaningful and timely consultation with Minnesota Tribal Nations will facilitate better understanding and informed decision making by allowing for collaboration on matters of mutual interest and help to establish mutually respectful and beneficial relationships between Minnesota governments and Minnesota Tribal Nations.

The Tribal Relations Policy aims to recognize and support the unique status of the Tribal Nations and their right to existence, self-governance, and self-determination, and to demonstrate a clear commitment to that sovereignty. It recognizes the unique legal relationship between the State of Minnesota and the Minnesota Tribal Nations, respects the fundamental principles that establish and maintain this relationship, and accords Tribal Governments the same respect accorded to other governments. The policy also designates a tribal liaison to assume responsibility for implementing the policy and serve as the point of contact for tribal nations.

Adoption of the policy formally establishes a responsibility for the Met Council to intentionally consult with Tribal Nations prior to decisions that impact those communities. The Met Council expects that council members, committee members, and staff respect the policy's principles at all phases of studying, planning, and developing regional projects, as well as providing essential services across the metro area.

This plan adopts the commitments to meaningful consultation expressed in the Tribal Relations Policy, and will help guide how the Met Council involves Tribal Nations in ongoing and future planning efforts.

Consultation

Consultation is a process of meaningful communication and coordination between the Met Council Chair and council members, and tribal officials before taking actions or making decisions that may affect tribes or tribal interests.

Government-to-government communication will be conducted in a timely manner by all parties, about a proposed or contemplated decision to:

- Secure meaningful tribal input and involvement in the decision-making process; and
- Advise the tribe of the final decision and provide clarification on the how decisions were reached.

Collaboration

Met Council staff are encouraged to collaborate with tribal staff when project plans and development directly impact tribal resources. Met Council staff should include all 11 federally recognized tribes in Minnesota in this outreach and give them the opportunity to choose to participate or not participate in any given process.

- Share and compare in a timely manner relevant plans, programs, projects and schedules with the related plans, programs, projects, and schedules of the other parties.
- Adjust plans, programs, projects, and schedules as needed to maintain transparency and accountability.

Coordination

Met Council staff are encouraged to engage and collect input directly from other tribal groups and members of tribes who have no official capacity within the federally recognized tribal communities about projects in and around the communities where they live, or around areas that hold cultural significance.

Engagement methods

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

For each plan, program or study, outreach staff or consulting groups will create an outreach and engagement plan that reflects the broader goals, strategies, and tactics of this Public Participation Plan and selects from the methods described below. A mixture of these strategies will be used in every effort, as is appropriate for the specific audiences and stakeholders.

Inform

Method	Description
Stakeholder analysis	Conduct a stakeholder analysis to understand those that are most affected or interested in the plan, program, or study.
Background information	Create content for websites, fact sheets, presentations, and other materials

Method	Description
Newsletter	Create informational news articles for the website on projects, programs, plans and studies.
Media coordination	Coordinate media outreach to media outlets throughout the metro area, highlighting programs, plans, studies, and projects throughout the region.
Special events	Plan and develop content to announce, highlight or kick-off an issue, discussion, project, initiative, or news event.
Learning opportunities	Design open houses, meetings, tours, or receptions specific to locations that interest the public, or other experience to highlight an initiative, project, or facility
Ongoing communications	Identify key issues, provide context, and communicate progress toward related policy goals to stakeholders

Consult

Method	Description
Met Council committees	Get feedback on plans, projects and studies through the Met Council and the Transportation Advisory Board, and their advisory committees.
Work groups	Convene work groups focusing on specific topics that can be made up of Met Council, Transportation Advisory Board, or advisory committee members.
Ad-hoc advisory committees	Create specific stakeholder or policy-maker advisory groups to guide the development of foundational plans.
Experts	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.
Local consultation	Gather information from local communities about their processes related to local and regional projects, including those submitted for funding through the Regional Solicitation.
Staff input	Conduct discussions among Transportation Planning and other related staff on policies, plans or studies whose work is shaped by the outcome.

Involve and collaborate

Method	Description
Social media	Use these to connect constituencies to planning efforts and promote involvement – both for two-way discussion and one-way push marketing.
Interactive engagement tools	Leverage online 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.
Surveys	Design and disseminate surveys through social media, electronic mailing lists, idea-gathering platforms, and websites to ask questions and promote discussion spaces.
Forums	Host online or in person listening sessions, workshops, and conferences to feature policy aspects and promote topic-based policy discussions on plan content, elicit stakeholders' and communities' ideas and perspectives on regional issues, projects, and initiatives.
Focus groups, small group discussions	Host focus groups or small-group discussions about issues, activities, or public perceptions from stakeholders to gain more in-depth information.
One-on-one interviews	Conduct interviews with key stakeholders to help shape and inform policies, plans or studies, as well as further outreach and engagement opportunities.
Public comment	Publish draft plans or programs for public comment, compile feedback, and post responses.

Co-creation

Method	Description
Establish expectations	Be clear on how feedback gathered will be used to inform policies, plans, programs, or studies.
Incorporate feedback	Update existing foundational planning documents to reflect lessons learned through engagement strategies.
Feedback from other activities	Incorporate any transportation-related feedback and guidance from other regional planning activities, including the regional development guide, and transportation corridor planning and implementation.
Work plans	Include engagement guidance in work plan for the Transportation Policy Plan, and specific expectations for items funded through the Unified Planning Work Program.

Public comment periods 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 involve people more formally 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:

- Met 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.
- 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.
- A public notice is placed on the Met Council's website, and in a newspaper of regional circulation to formally announce public meetings/hearings and how to comment.
- A notice of release is issued to the following major and niche outlets:
 - Major metro-wide circulation daily newspapers/related daily online 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:
 - Social media channel posts
 - Email announcement to targeted audiences
 - Earned promotion through various partner organization newsletters, websites, and publication channels (typically community organizations that represent a specific, hard-to-reach or general audience).
 - Blurb announcement in the Met Council's newsletter.
- 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 Met Council collects public comment through the website, email, traditional mail, and recorded phone message. Spoken and written testimony is received through the public hearing.
- A report is created at the close of the process, and that information is shared publicly and with the Met Council for decision-making.

Key transportation plans and programs

Plans or program	Description	Public participation considerations
Transportation Policy Plan	<p>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.</p> <p>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>	<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>A minimum public comment period of 45 calendar days shall be provided before the initial or revised plan is adopted.</p>
Regional Solicitation	<p>The Regional Solicitation is a process that allocates federal transportation funds to locally initiated projects to meet regional transportation needs. The Met 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>	<p>The Met Council will collaborate with the Transportation Advisory Board and its Technical Advisory Committee to engage communities more actively 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. Highlight completed projects funded through the Regional Solicitation process. The Met 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. 4. Explore and develop a public participation plan on projects selected through the Regional Solicitation.
Transportation Improvement Program	<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 Met Council prepares the TIP in cooperation with the Minnesota Department of Transportation. The TIP includes federal funds allocated through the regional solicitation process, and</p>	<p>The standard Met Council public comment process applies to the Transportation Improvement Program with a 45-day comment process. A 21-day comment process is used for any proposed regionally significant amendments to the TIP.</p> <ol style="list-style-type: none"> 1. The Met Council will coordinate with Minnesota Department of Transportation to work toward a

Plans or program	Description	Public participation considerations
	federal formula funds programmed by the Minnesota Department of Transportation, the Met Council and transit providers.	monthly opportunity to comment on any TIP amendment coming before the Transportation Advisory Board's Technical Advisory Committee. There will be an open opportunity to speak to the committee at its monthly meeting.
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 Met 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.	Each item identified in the work program will be evaluated for engagement opportunities as the project is scoped and before a work plan is in place. The program will go out for a public comment period before adoption. That period is determined based on the program's overall adoption schedule.
Air Quality Conformity Determination	<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.</p> <p>Therefore, transportation plans, projects, and programs are subject to air quality analysis.</p>	
Transportation Public Participation Plan	<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>	A minimum public comment period of 45 calendar days shall be provided before the initial or revised participation plan is adopted.

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 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 to achieve the goals stated above:

Goal/Outcomes	Policy	Method of Evaluation of Effectiveness
Consistency with overall vision, outcomes, and goals	Thrive MSP 2040, 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	Thrive MSP 2040, 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	Thrive MSP 2040, Public Engagement Plan	<ul style="list-style-type: none"> • Existing relationships with partners and stakeholders are deepened with the Met Council • New relationships are formed within transportation and other sectors

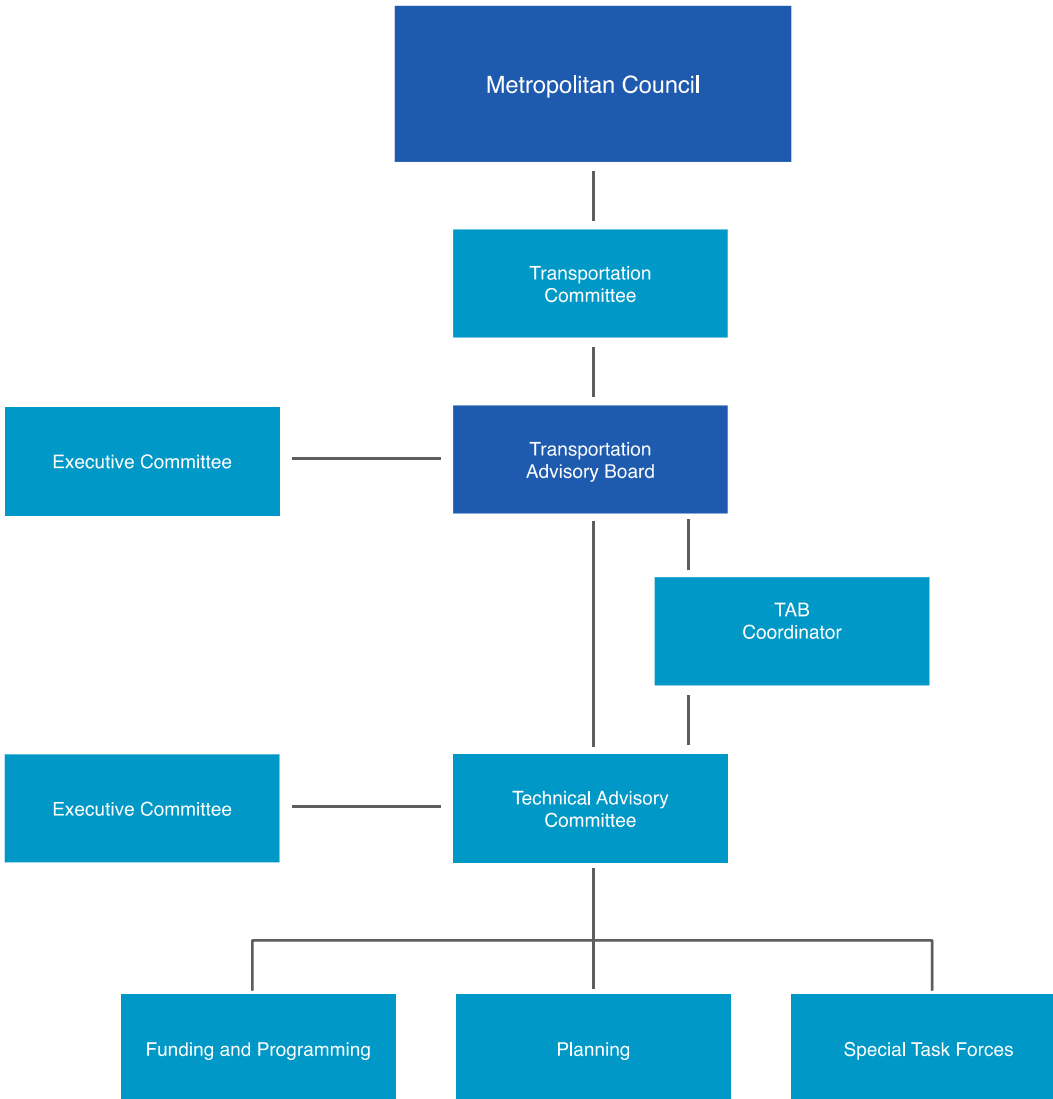
Goal/Outcomes	Policy	Method of Evaluation of Effectiveness
Augment and amplify outreach and engagement goals	Thrive MSP 2040, Public Engagement Plan	<ul style="list-style-type: none"> Integrate outreach and engagement goals into public participation plans that are measurable and transferrable to other 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 by creating work groups or subcommittees 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)

Transportation advisory bodies

The Met 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 Met Council appoints members of the 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 Met Council's standing committees, and/or provide expert advice.



2-25-2020

1. **Transportation Advisory Board (TAB):** The TAB works in conjunction with the Met 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 Met Council to represent non-motorized transportation, one member representing the freight transportation industry, two members representing public transit, one “citizen” representative from each Met Council district (for a total of eight), and one Met Council member. The TAB chair is appointed by the Met Council from among the 34 members. The TAB works closely with the Met Council, reviewing, commenting on, and coordinating transportation planning and programming activities. A key responsibility of the Met 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 Met 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

Other related advisory bodies

1. **Transportation Accessibility Advisory Committee (TAAC):** The TAAC was created by the legislature and consists of 16 members including a chair appointed by the Met Council – seven members chosen by disability and senior groups in the metro area, and eight others, also selected by the Met Council, who represent districts that are combinations of the Met 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.

2. **Equity Advisory Committee:** In late 2015, the Met Council created an advisory committee to advise the Met Council on issues related to the equity commitments in Thrive MSP 2040 and other Met 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.

Connect with the Metropolitan Council

The Metropolitan Council is committed to an inclusive public engagement process that involves agencies, officials, local planning staff, businesses, organizations, and residents of the region and providing appropriate forums for input and feedback.

Contact the Metropolitan Council

We welcome public involvement and encourage you to [contact us](#) with your questions or comments about regional issues or Met Council activities.

To keep up with news and events, or to access additional resources including project updates, meetings, reports, plans, and more, visit metro council.org.

[Sign up for email or text alerts.](#)

Call our Public Information line at 651.602.1500 or email us at public.info@metc.state.mn.us.

Follow the @MetropolitanCouncil on [Facebook](#) and [YouTube](#) or @MetCouncilNews on [Twitter](#) and [Instagram](#).

Attachment E: Language Assistance Plan

Metropolitan Council Title VI Limited English Proficiency Language Assistance Plan

2022



Table of Contents

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.

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 33 million bus and rail passengers in 2021 with award-winning, energy-efficient fleets. As is the trend throughout the transit industry, this number has dropped significantly since the pandemic started in March 2020.

Metro Transit operates the METRO Green Line, METRO Blue Line, NorthStar commuter rail line and 125 bus routes, using a fleet of about 916 buses and 100 rail vehicles. In the last three years, Metro Transit opened the METRO Orange Line, a highway bus rapid transit (BRT) lines that compliments the METRO Red and A and C lines. 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 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.

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 Populations with limited English proficiency 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.

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. Populations with limited English proficiency can obtain copies/translations upon request.

Further questions regarding this plan may contact:

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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 Populations with limited English proficiency 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 Populations with limited English proficiency, should develop an implementation plan to address the needs of the Populations with limited English proficiency they serve. The DOT LEP Guidance notes that effective implementation plans typically include the following five elements:

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

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 Customers with limited English proficiency. The Liaison will also investigate and resolve language access complaints from the LEP community.

Identification of Persons with Limited English

Proficiency in the Service Area

DOT Guidance: “There should be an assessment of the number or proportion of Populations with limited English proficiency 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 Populations with limited English proficiency. 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 Populations with limited English proficiency 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 the following sections.

Number & Proportion of Persons with Limited English Proficiency 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 **2016-2020 ACS** provided quantitative information regarding Populations with limited English proficiency for the seven-county region and Metro Transit’s service area. An analysis of these data identified Populations with limited English proficiency and their language characteristics within the Metro Transit service area.

ACS data indicate that the total population within Metro Transit’s service area is **2,168,074**. In addition, **17%** of the total population is age 5 and older and speaks a language other than English at home (**369,267**). Of these individuals, **40% (147,814)** 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 Populations with limited English proficiency within Metro Transit’s service area according to the twelve foreign language classifications contained in the **2016-2020 ACS** at the tract level. No languages have Populations with limited English proficiency that exceed 5% of the total population in the service area. Eleven of the twelve languages classifications have Populations with limited English proficiency 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	42,981	29.1%	2.0%
Other Asian and Pacific Island languages	41,337	28.0%	1.9%
Other or unspecified languages	31,069	21.0%	1.4%
Vietnamese	6,592	4.5%	0.3%
Other Indo-European languages	5,927	4.0%	0.3%
Chinese (incl. Mandarin, Cantonese)	5,789	3.9%	0.3%
Russian, Polish, and other Slavic languages	5,139	3.5%	0.2%
French, Haitian, and Cajun	3,054	2.1%	0.1%
Arabic	2,735	1.9%	0.1%
Korean	1,360	0.9%	0.1%
Tagalog (incl. Filipino)	1,045	0.7%	0.0%
German and other West Germanic languages	786	0.5%	0.0%

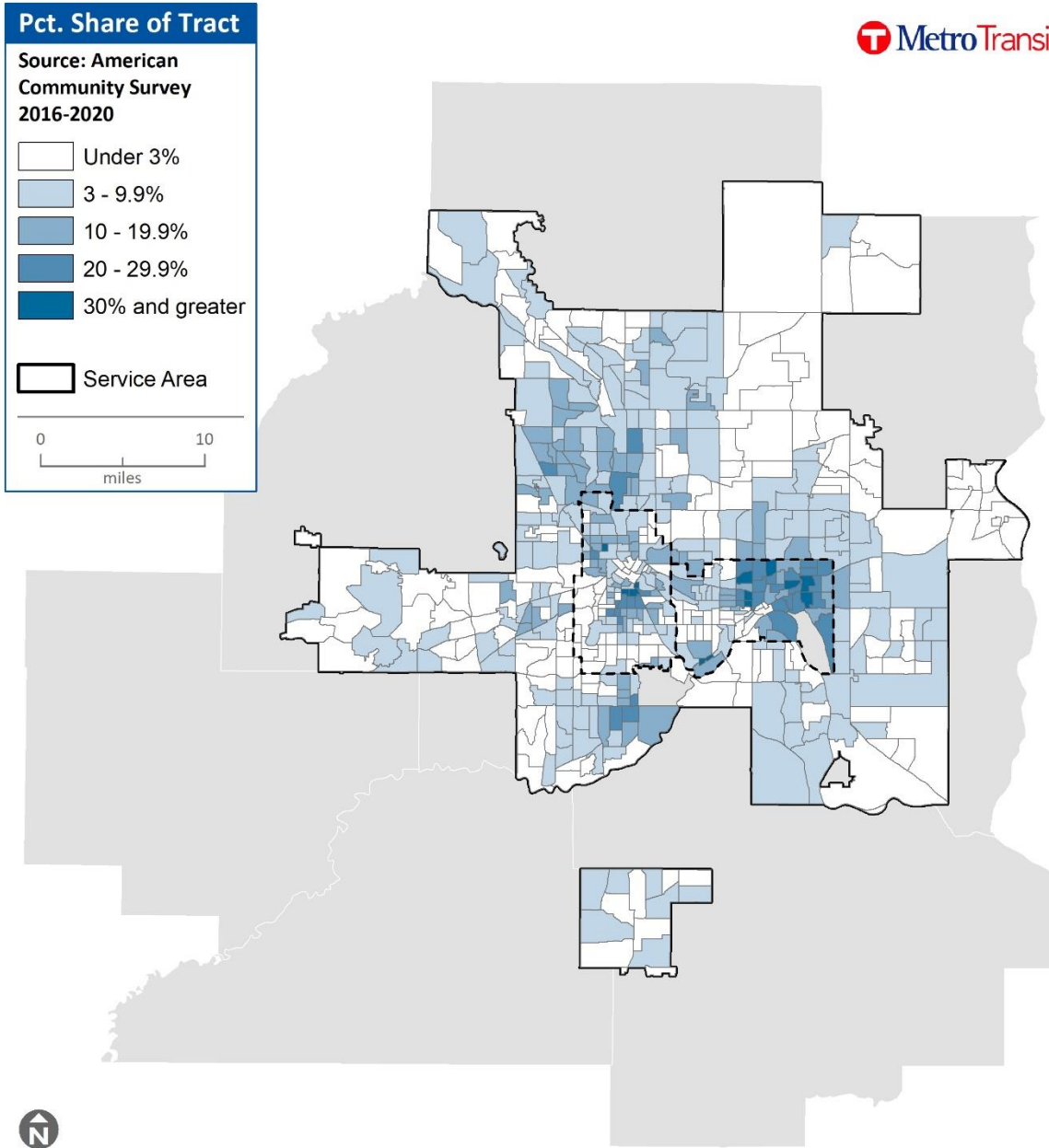
The Frequency of Contact Between Populations with limited English proficiency and the Council’s Transportation Services

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 and supplemental data.

Interactions with Populations with limited English proficiency

LEP Population Distribution

Using the language categories contained in the **2016-2020 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 SaintPaul, central and north Minneapolis, and cities to the northwest and south of Minneapolis.



***Distribution of Limited English Proficiency (LEP)*
All Language Speakers***

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

Figure 1 – Distribution of Limited English Proficiency, All Language Speakers

No languages have Populations with limited English proficiency that exceed 5% of the total population in the service area. Eleven out of twelve languages and language groups included in the **2016-2020 ACS** have Populations with limited English proficiency over 1,000. The most frequently spoken language is Spanish, which is spoken by 29.2% of the LEP population in the service area. Vietnamese is also a prevalent language whose speakers comprise 4.5% of the LEP population.

For language classifications containing multiple languages, additional data beyond ACS is needed to determine how individual languages are represented among LEP populations that are likely to interact with Metro Transit service.

School district data provides insight into languages that are not individually available in the ACS. The Minnesota Department of Education reports student populations that are enrolled in 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 **2016-2020 ACS**. Student enrollment data shows that Hmong, Karen, and Somali are languages with Populations with limited English proficiency 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 SaintPaul.

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

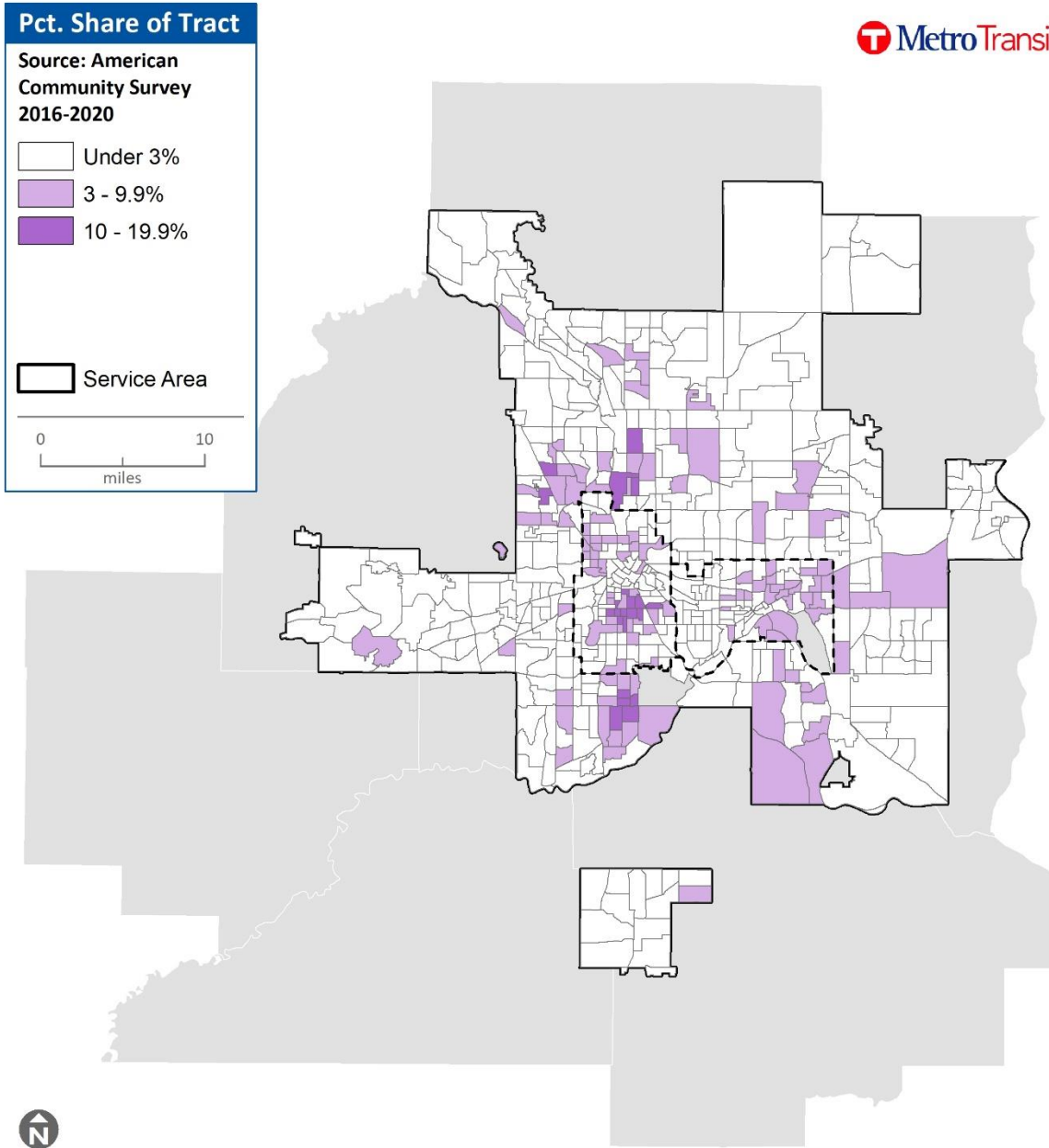
Language	Number of EL Students (K-12)
Spanish	12,450
Hmong	5,697
Somali	4,555
Karen	1,876
Oromo, Afan Oromo, Oromiffa	729
Arabic	529
Amharic	445
Vietnamese	364
Nepali	251
Swahili, Kiswahili	245
Chinese, Mandarin	211
English, Creolized	171
French	168
Tigrinya	119
Russian	109
Other languages with fewer than 100 ELs	1,095

Spanish has an LEP community that accounts for over 5% of the total LEP population; similarly, Hmong, Karen, and Somali are within language classifications that each account for over 5% of the total LEP population. Given EL enrollment data, 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.

Among EL enrollment, no other languages besides Hmong and Karen are within “Other Asian and Pacific Islander languages” and represent the primary language of at least 100 students. Within “Other or unspecified languages,” the languages of Somali, Oromo, Amharic, Swahili, and Tigrinya each represent the primary language of at least 100 students. Somali is the only language with over 1,000 EL students. No further analysis of other “Other Asian and Pacific Islander languages” and “Other or unspecified languages” is necessary given the lack of specific ACS population data and lower EL enrollment of other languages besides Hmong, Karen, and Somali.

Figures 2-11 map the tract-level distribution of Populations with limited English proficiency in the service area by each of the twelve language classifications of the **2016-2020 ACS**. Maps are not shown for 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:

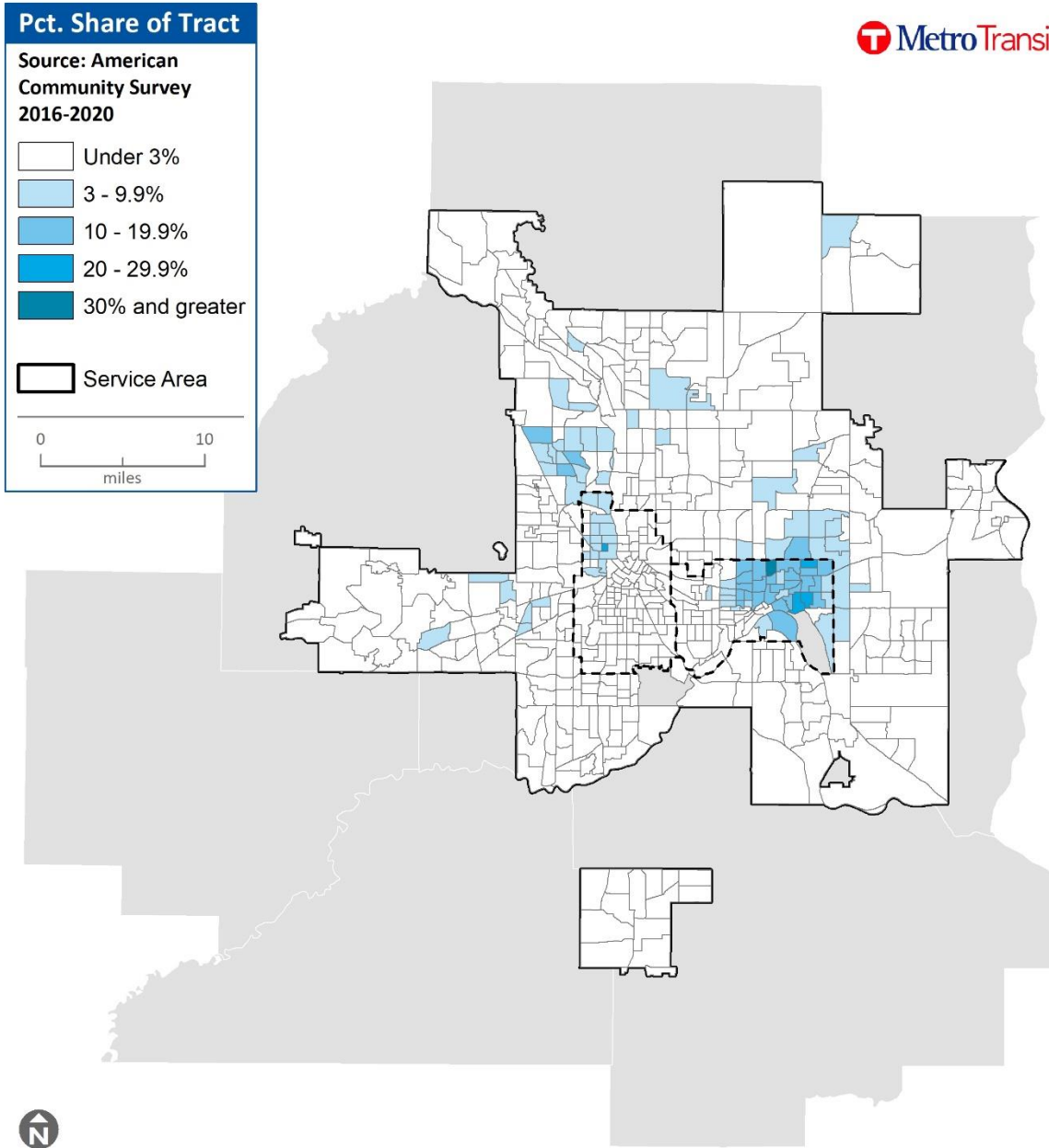
- LEP Spanish speakers are widely dispersed relative to other language groups and are located in both urban and suburban communities (Figure 2);
- LEP speakers of “other Asian and Pacific Island languages” (i.e. Hmong and Karen) reside in North Minneapolis, in Saint Paul along University Avenue and on the East Side, and also in suburbs in the north, northwest, and west metro (Figure 3);
- 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 Saint Paul (Figure 4);
- LEP Vietnamese speakers are located in north and northwest areas of the metro, but they also reside along University Avenue in Saint Paul (Figure 5);
- LEP speakers of other Indo-European languages are dispersed among communities in the north and west metro (Figure 6);
- LEP Chinese speakers live around the University of Minnesota, with other communities in the west and southwest metro suburbs (Figure 7);
- LEP speakers of Russian, Polish, and other Slavic languages reside in the west and northwest suburbs, but also in Highland Park in Saint Paul (Figure 8);
- LEP speakers of French, Cajun, and Haitian live in dispersed communities in the northwest, west, and south metro (Figure 9);
- LEP Arabic speakers reside in central Minneapolis as well as the north and south metro (Figure 10);
- LEP Korean speakers reside north of Saint Paul (Figure 11);
- LEP Tagalog speakers live east of downtown Saint Paul (Figure 12).



***Distribution of Limited English Proficiency (LEP)*
Spanish Speakers***

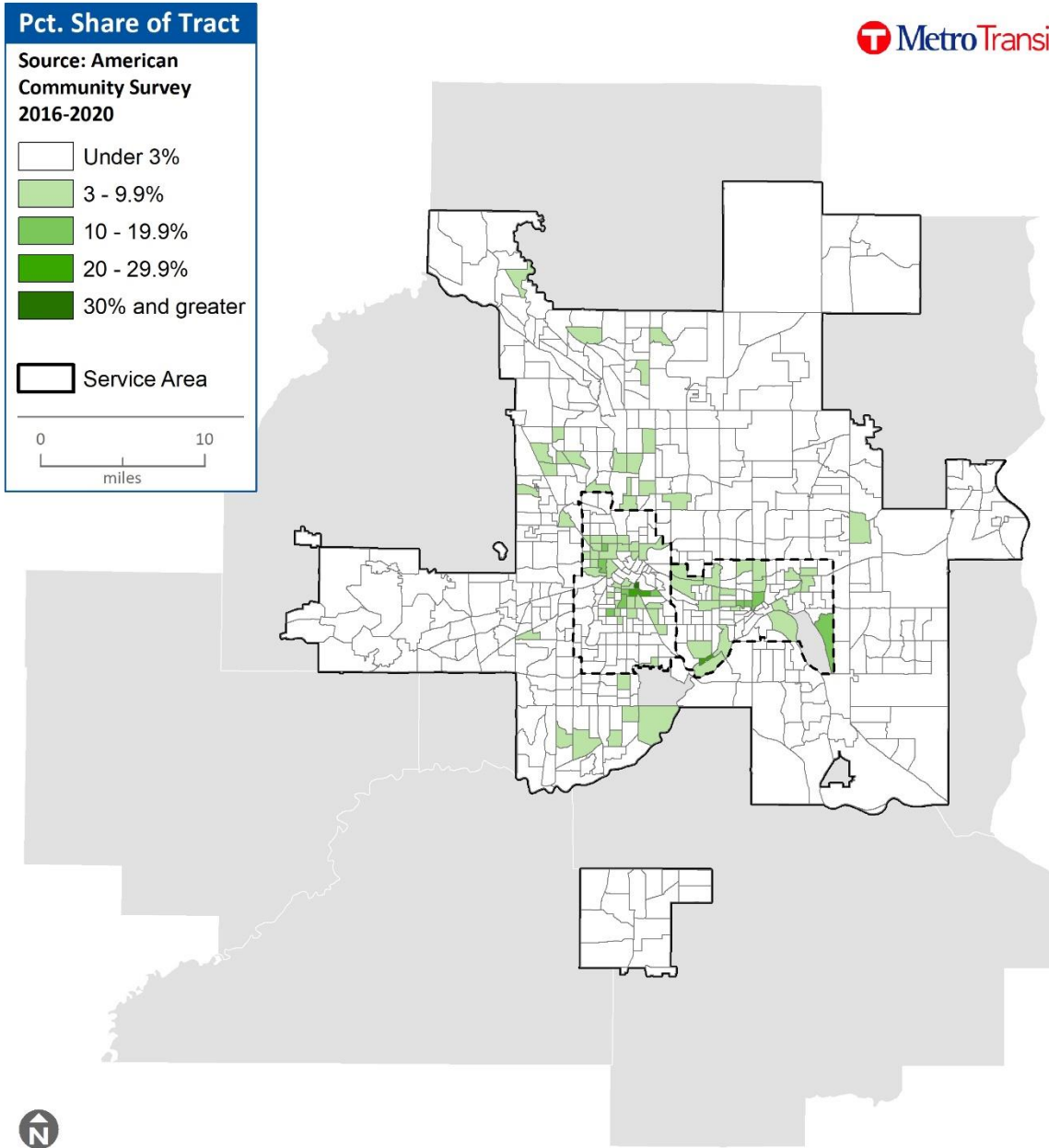
* English spoken less than "very well," ages 5 and older

Figure 2 – Distribution of Limited English Proficiency - Spanish Speakers



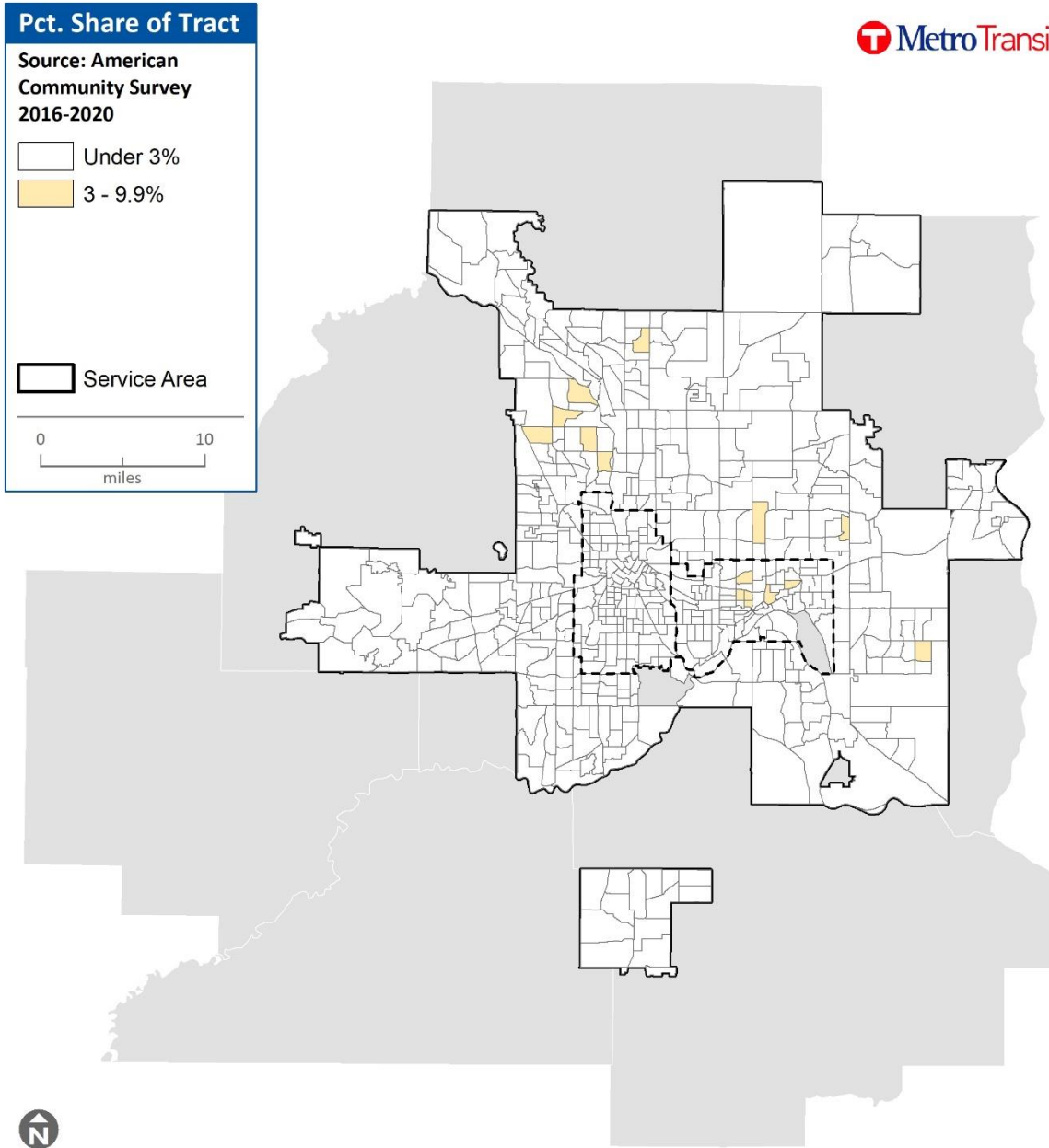
***Distribution of Limited English Proficiency (LEP)*
Other Asian and Pacific Island Language Speakers (includes Hmong and Karen)***
* English spoken less than "very well," ages 5 and older

Figure 3 – Distribution of Limited English Proficiency – Other (API)



***Distribution of Limited English Proficiency (LEP)*
Other and Unspecified Language Speakers (includes Somali)***
* English spoken less than "very well," ages 5 and older

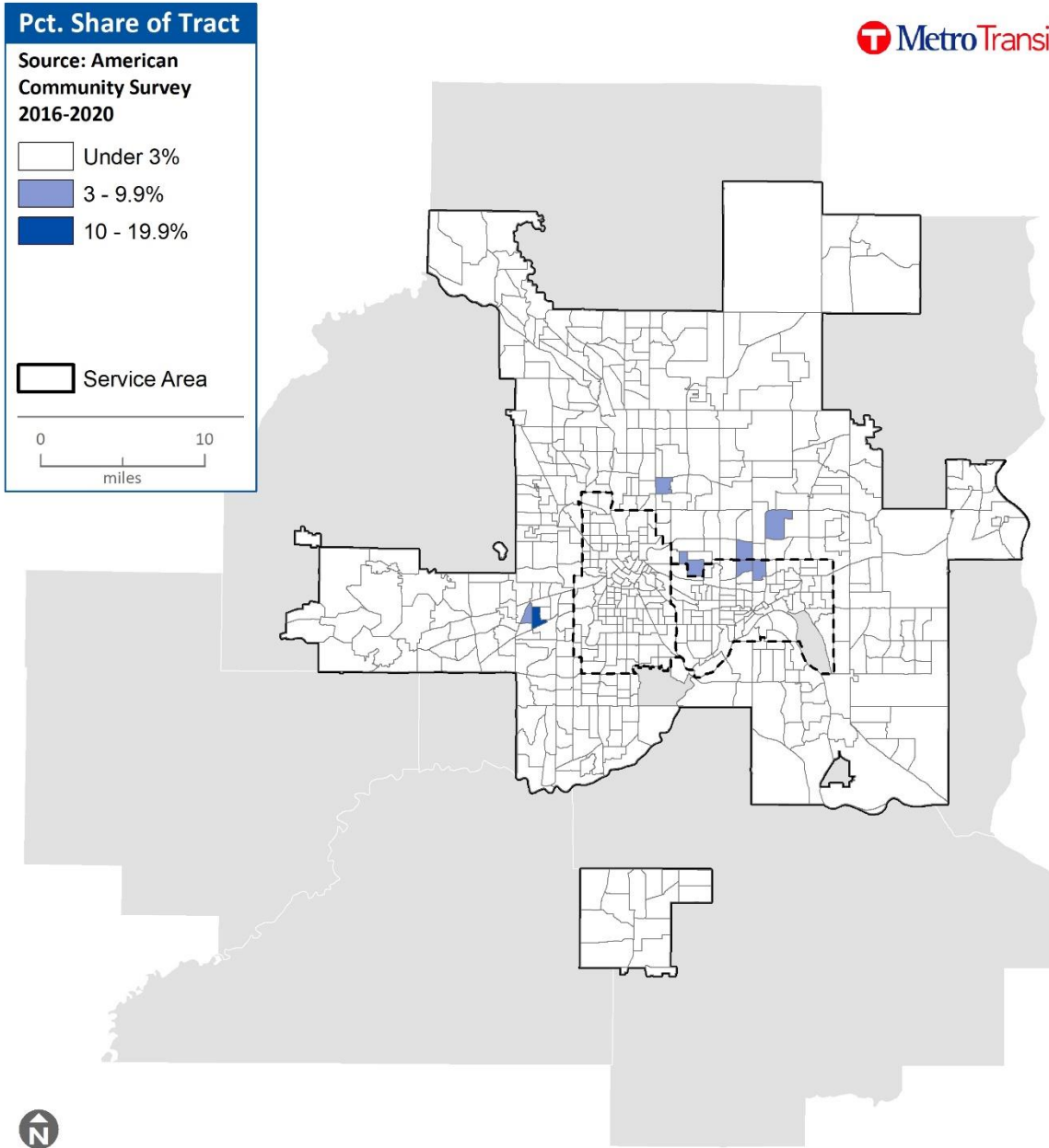
Figure 4 - Distribution of Limited English Proficiency - Other and Unspecified



***Distribution of Limited English Proficiency (LEP)*
Vietnamese Speakers***

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

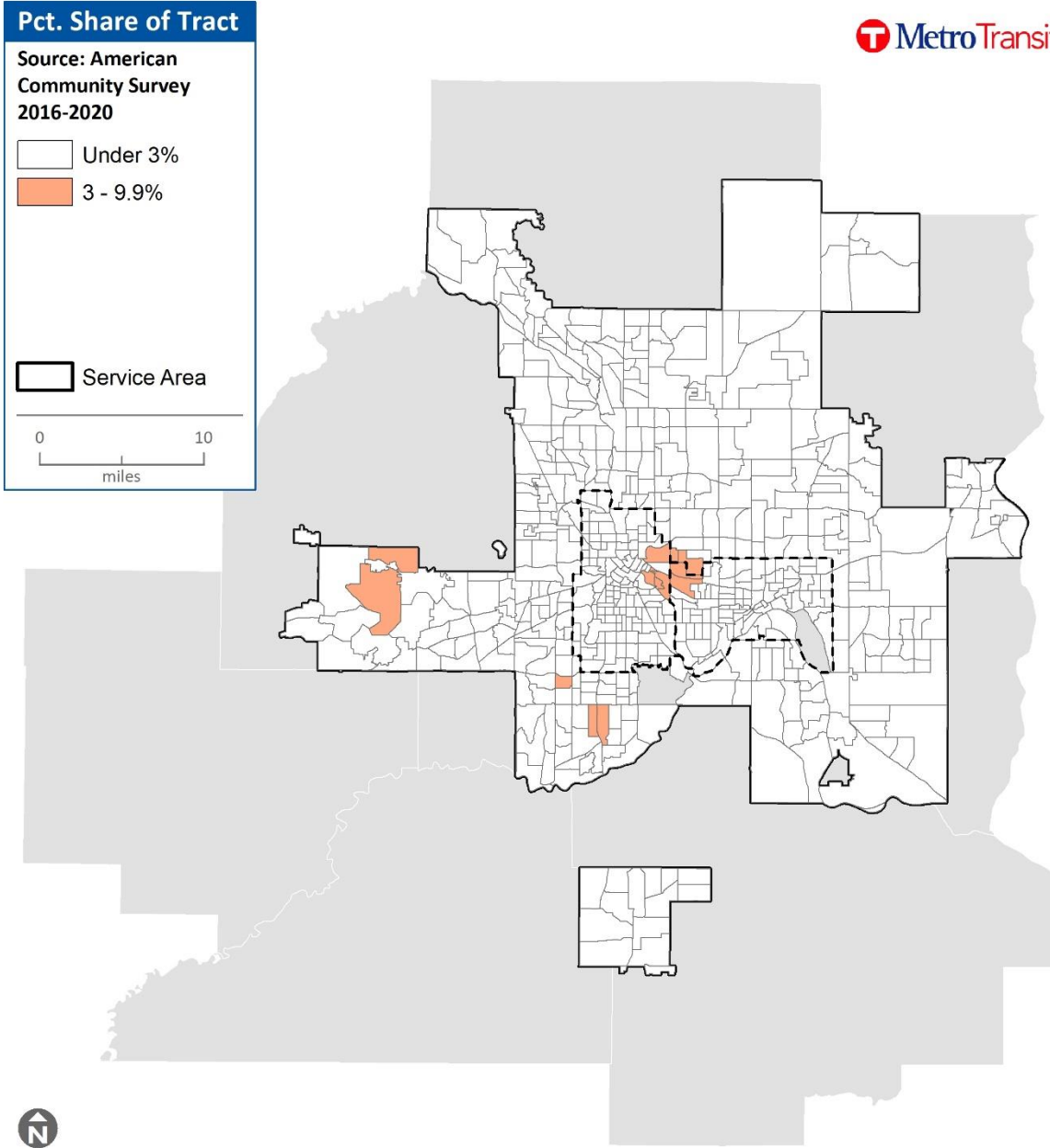
Figure 5 - Distribution of Limited English Proficiency - Vietnamese



***Distribution of Limited English Proficiency (LEP)*
Other Indo-European Language Speakers***

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

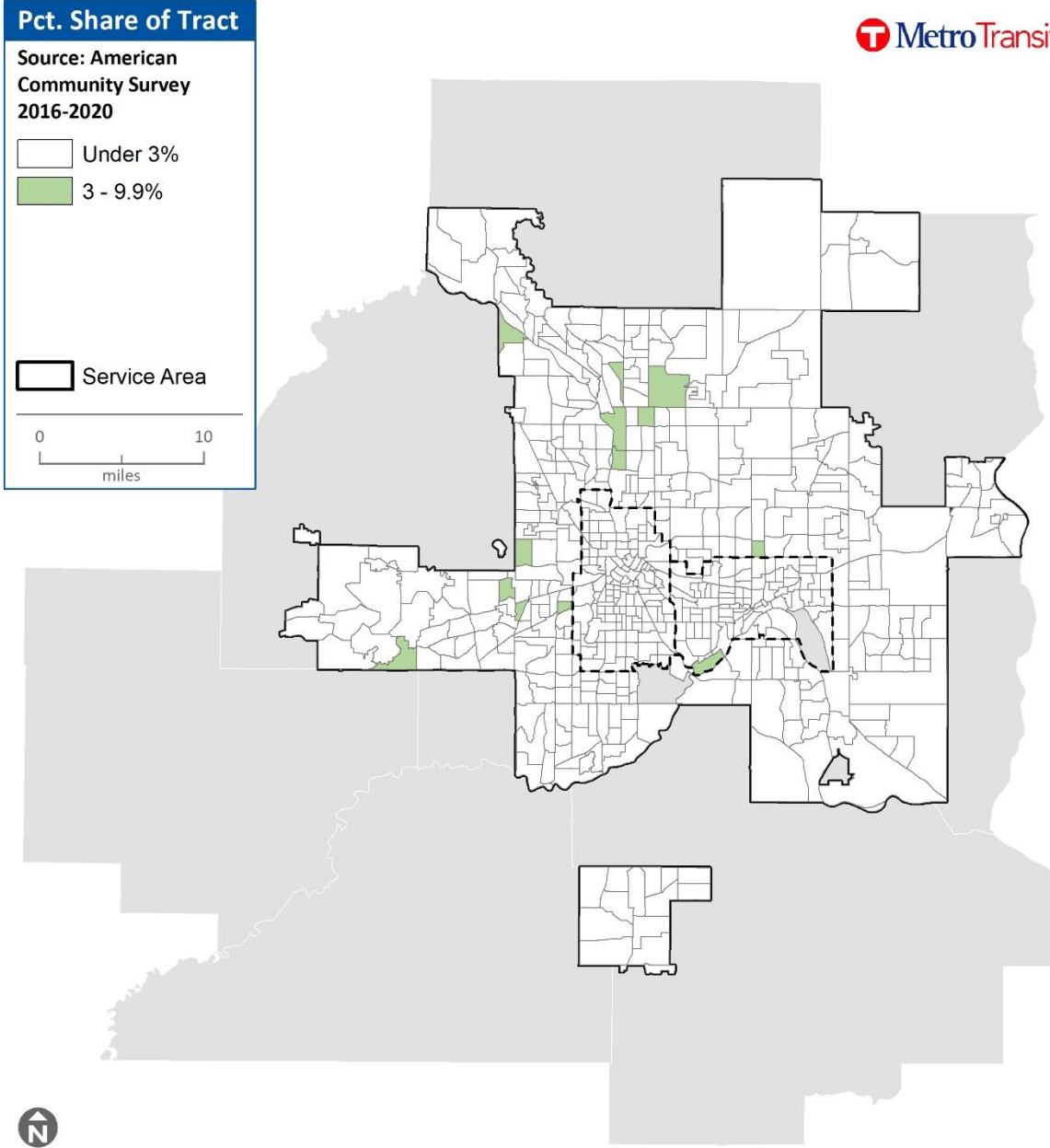
Figure 6 - Distribution of Limited English Proficiency – Indo-European



***Distribution of Limited English Proficiency (LEP)*
Chinese Speakers (includes Mandarin and Cantonese)***

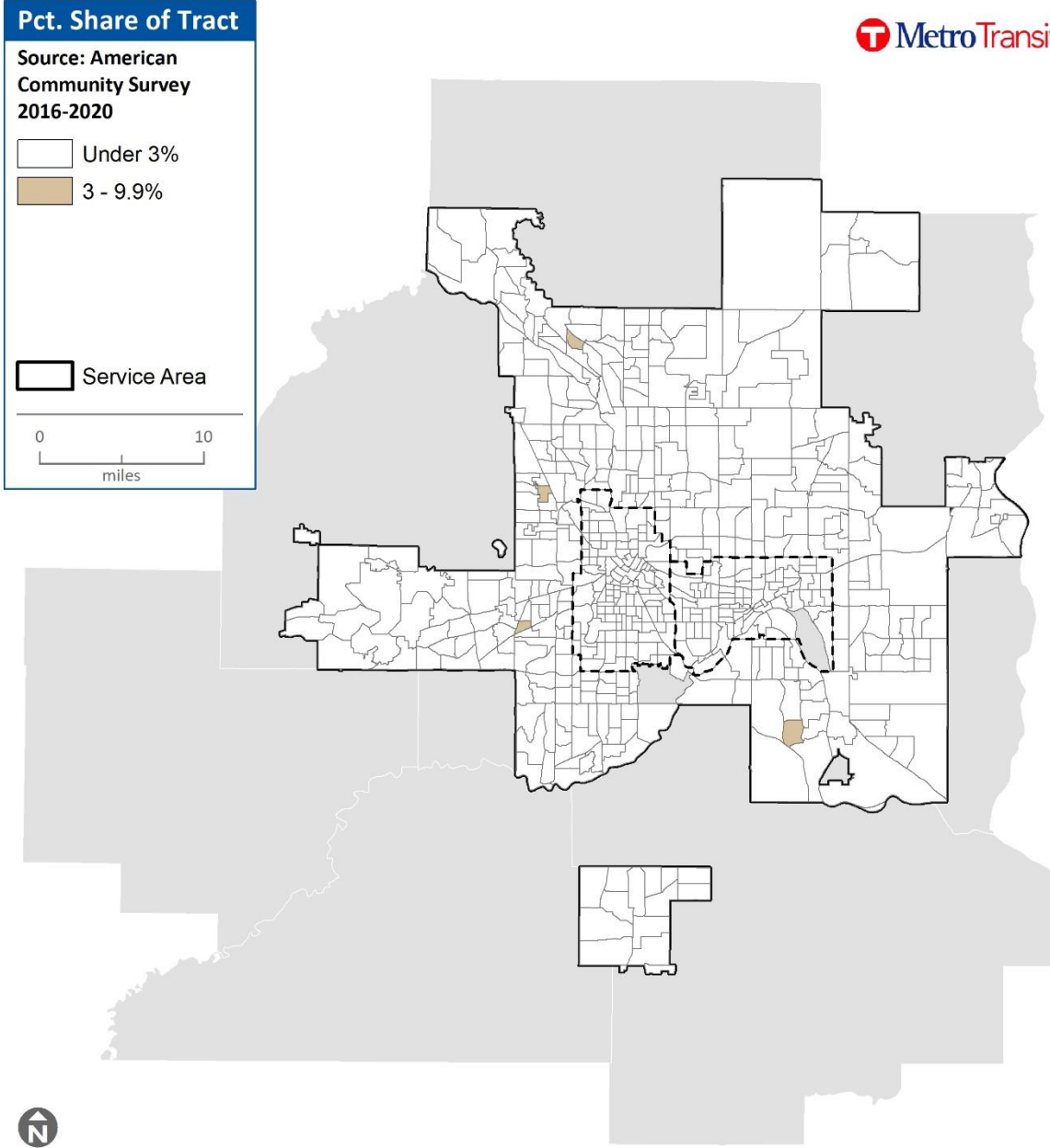
* English spoken less than "very well," ages 5 and older

Figure 7 - Distribution of Limited English Proficiency – Chinese



***Distribution of Limited English Proficiency (LEP)*
Russian, Polish, and Other Slavic Language Speakers***
* English spoken less than "very well," ages 5 and older

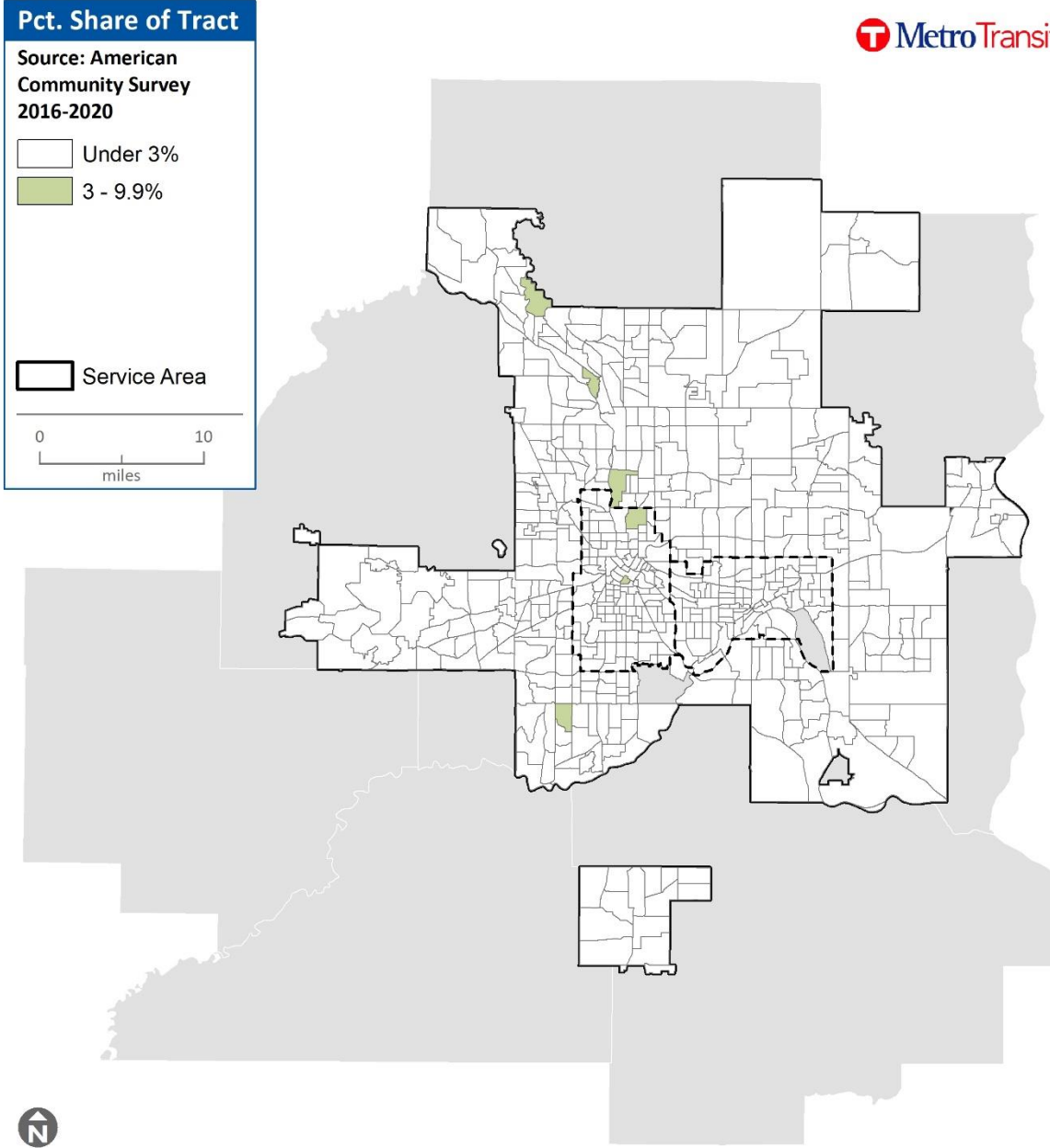
Figure 8 - Distribution of Limited English Proficiency – Russian, Polish and Other Slavic



***Distribution of Limited English Proficiency (LEP)*
French, Cajun, and Haitian Speakers***

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

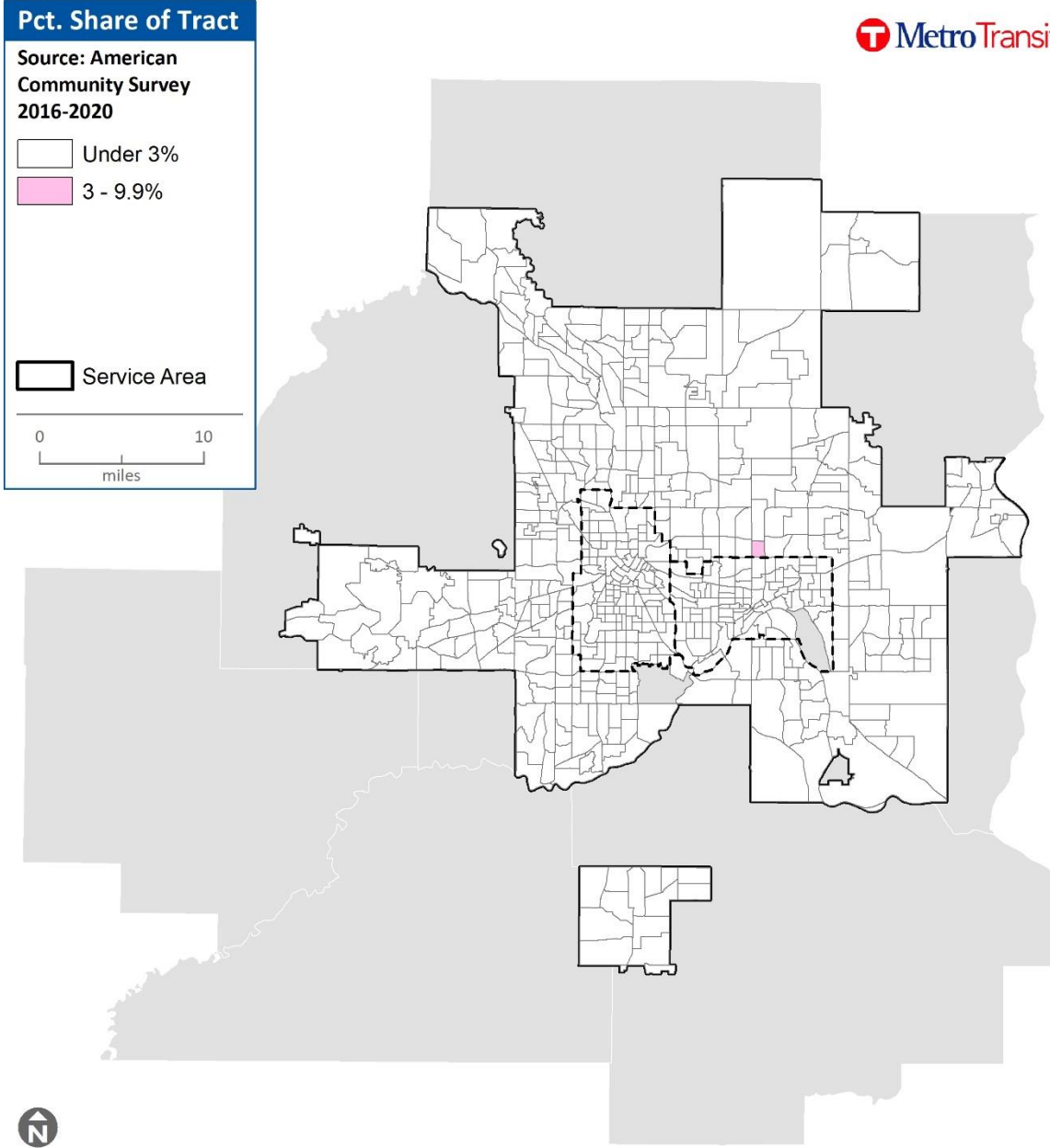
Figure 9 - Distribution of Limited English Proficiency – French, Cajun, and Haitian



***Distribution of Limited English Proficiency (LEP)*
Arabic Speakers***

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

Figure 10 - Distribution of Limited English Proficiency – Arabic

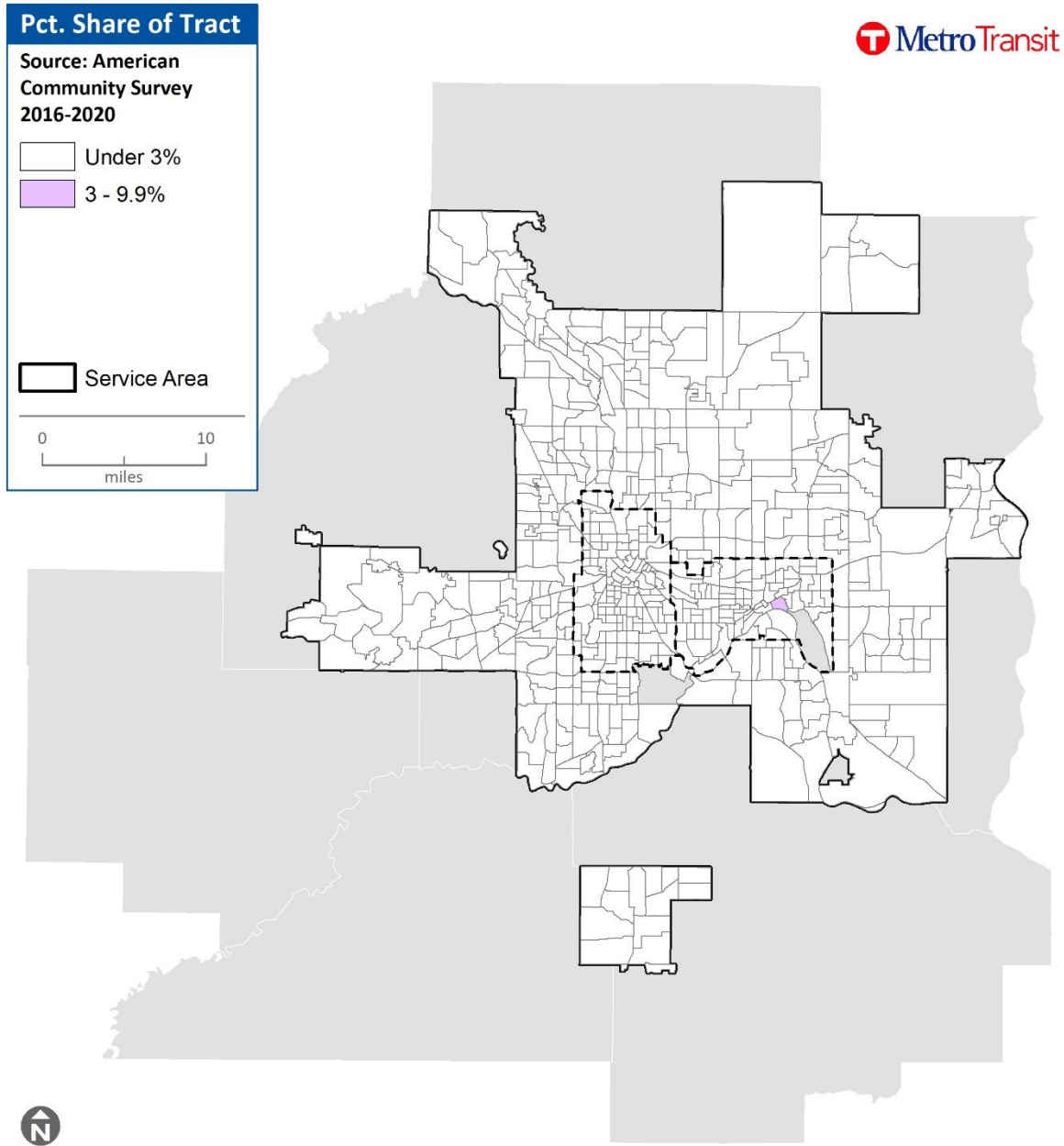


***Distribution of Limited English Proficiency (LEP)*
Korean Speakers***

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

Figure 11 - Distribution of Limited English Proficiency – Korean

Figure 12 - Distribution of Limited English Proficiency – Tagalog



***Distribution of Limited English Proficiency (LEP)*
Tagalog Speakers (includes Filipino)***

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

Additional mapping identifies likely locations where transit service is accessed by LEP speakers of languages *other than* Spanish, “Other Asian and Pacific Island languages,” and “Other or unspecified languages.” For each of the remaining languages or language groups in the ACS with over 1,000 LEP persons (refer to Table 1), residency near transit provides a reasonable expectation of transit interaction among LEP populations. Quarter-mile buffers and half-mile buffers were applied to active bus stops and transitway stations, respectively. Where buffers overlapped with tracts containing populations of at least 3% LEP persons, the LEP population of that tract was considered likely to interact with transit service. Since this analysis is focused on tracts with at least 3% LEP populations, rather than counting all LEP individuals in every tract, evidence of contact with transit service can be attributed to established or emerging community patterns.

To account for significant changes in transit service over the past three years, where bus stops throughout the region became inactive due to service suspensions, this mapping exercise analyzes LEP populations in relation to active stops and stations in March 2020 (pre-pandemic) and March 2022.

To demonstrate the methodology, Figures 13 and 14 show the relationship between LEP population distribution and proximity to transit for Vietnamese speakers. All except one tract with at least 3% LEP persons are near transit, accounting for more than 1,000 Vietnamese LEP speakers living in communities near Metro Transit service, based on both pre-pandemic and current service levels.

Figures 15-20 replicate this methodology for “Other Indo-European languages,” Chinese, and “Russian, Polish, and other Slavic languages.

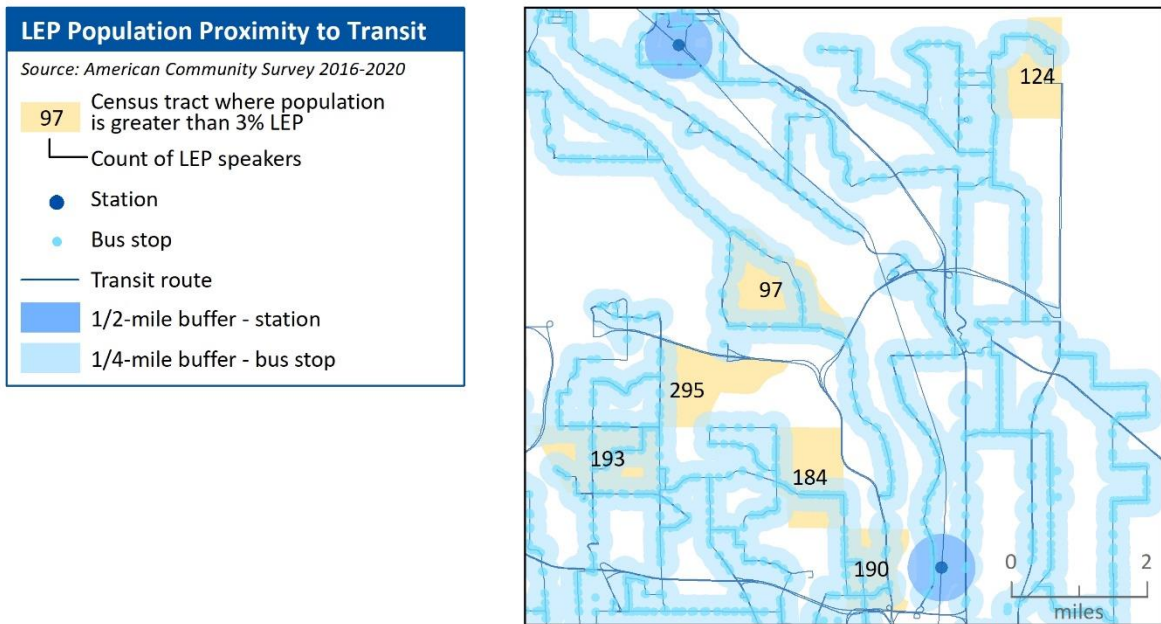
French, Arabic, Korean, and Tagalog each have fewer than 1,000 LEP speakers living in LEP communities near transit service. German is excluded from this analysis because no tracts in the service area exceed a minimum threshold of 3% LEP speakers in the total tract population.

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

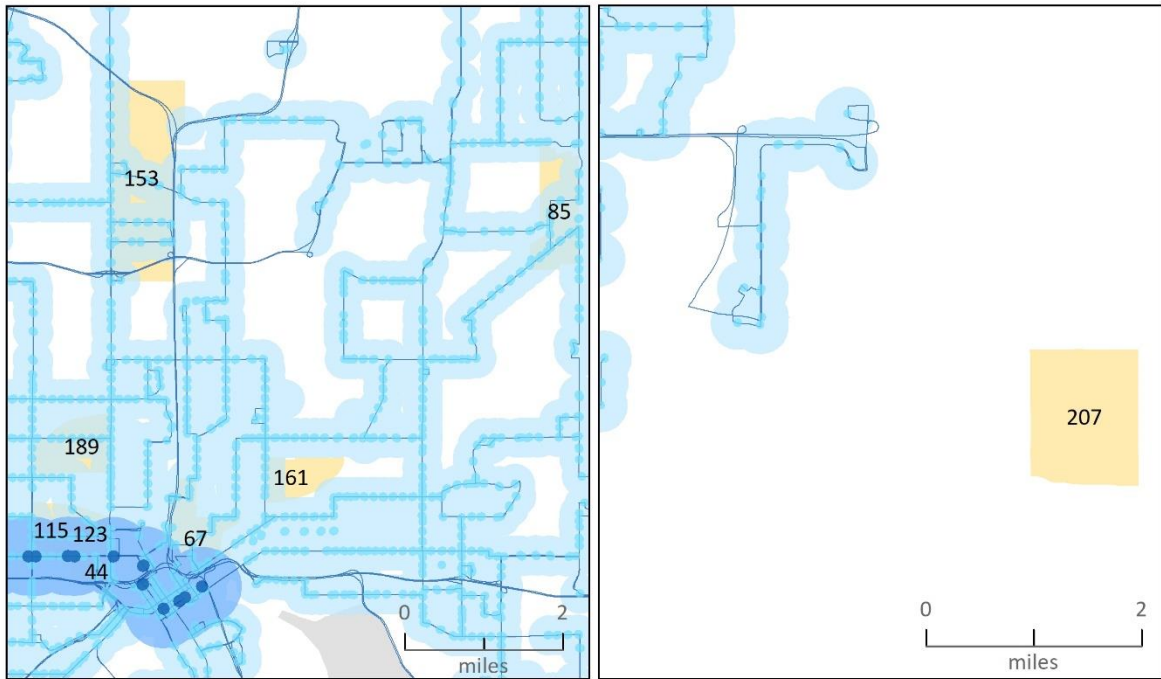
Table 3: LEP languages and population residing near transit

Language	LEP Speakers Residing in Tracts with at least 3% LEP population near Transit	
	March 2020	March 2022
Vietnamese	2,020	2,020
Other Indo-European languages	1,707	1,707
Chinese (incl. Mandarin, Cantonese)	2,001	2,001
Russian, Polish, and other Slavic languages	1,725	1,605
French (incl. Haitian, Cajun)	583	583
Arabic	748	748
Korean	49	49
Tagalog (incl. Filipino)	61	61

Figure 13 - Distribution of Limited English Proficiency – Vietnamese March 2020



Area A: North and northwest metro



Area B: Saint Paul and northeast metro

Area C: East metro

**Distribution of Limited English Proficiency (LEP)*
Vietnamese Speakers
March 2020 Service**



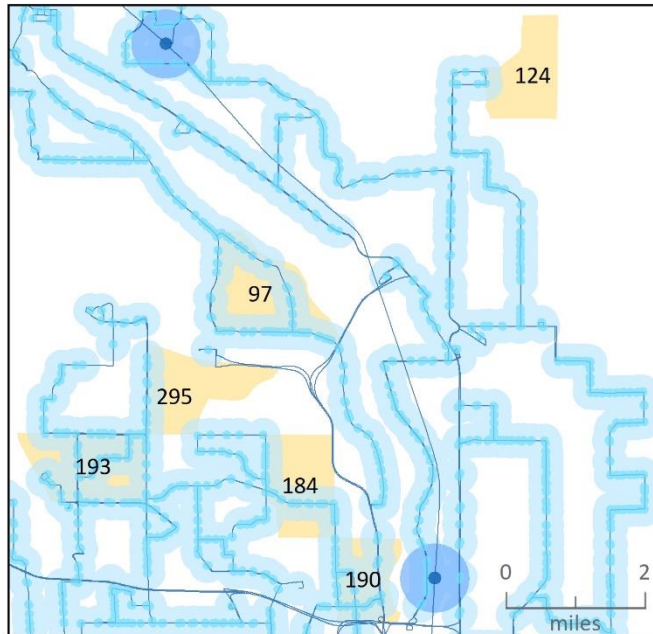
* English spoken less than "very well," ages 5 and older

Figure 14 - Distribution of Limited English Proficiency – Vietnamese March 2022

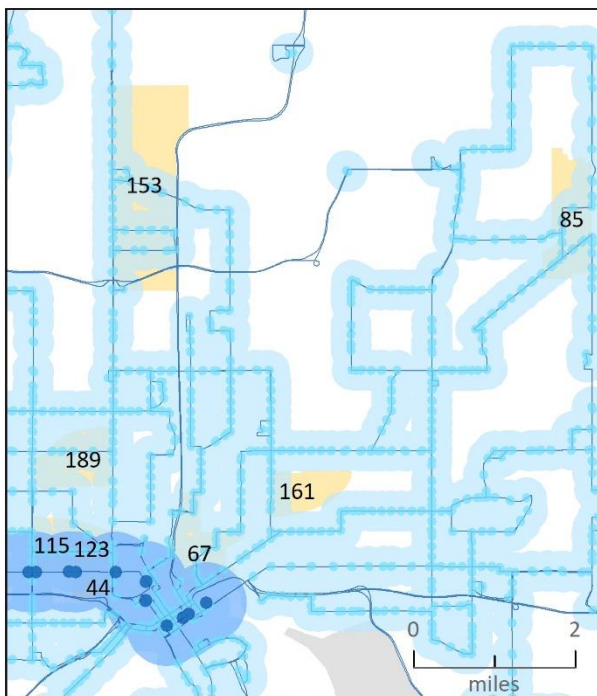
LEP Population Proximity to Transit

Source: American Community Survey 2016-2020

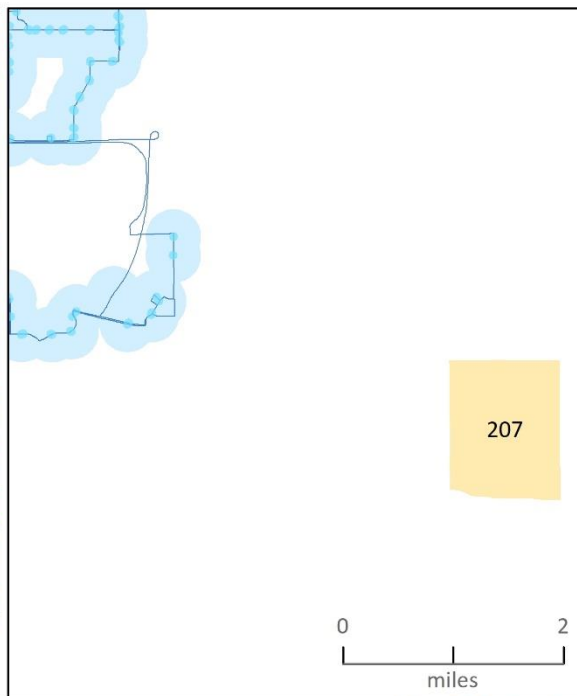
- 97 Census tract where population is greater than 3% LEP
- Count of LEP speakers
- Station
- Bus stop
- Transit route
- 1/2-mile buffer - station
- 1/4-mile buffer - bus stop



Area A: North and northwest metro



Area B: Saint Paul and northeast metro



Area C: East metro

**Distribution of Limited English Proficiency (LEP)*
Vietnamese Speakers
March 2022 Service**

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

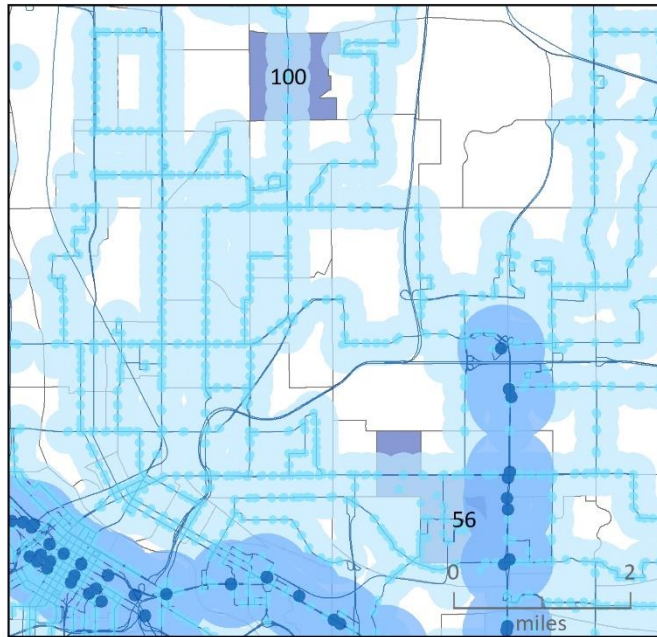


Figure 15 - Distribution of Limited English Proficiency – Other Indo-European March 2020

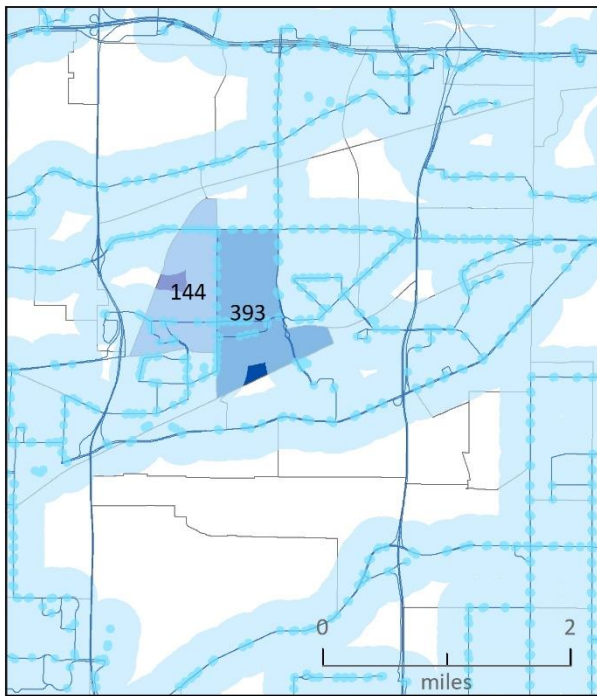
LEP Population Proximity to Transit

Source: American Community Survey 2016-2020

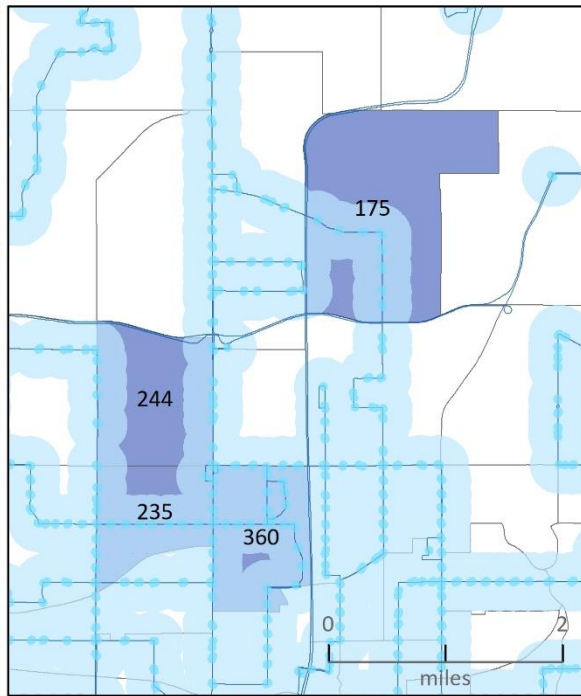
- 97 Census tract where population is greater than 3% LEP
- Count of LEP speakers
- Station
- Bus stop
- Transit route
- 1/2-mile buffer - station
- 1/4-mile buffer - bus stop



Area A: Minneapolis-Saint Paul and inner suburbs



Area B: West metro



Area C: Saint Paul and inner suburbs

**Distribution of Limited English Proficiency (LEP)*
Other Indo-European Language Speakers
March 2020 Service**

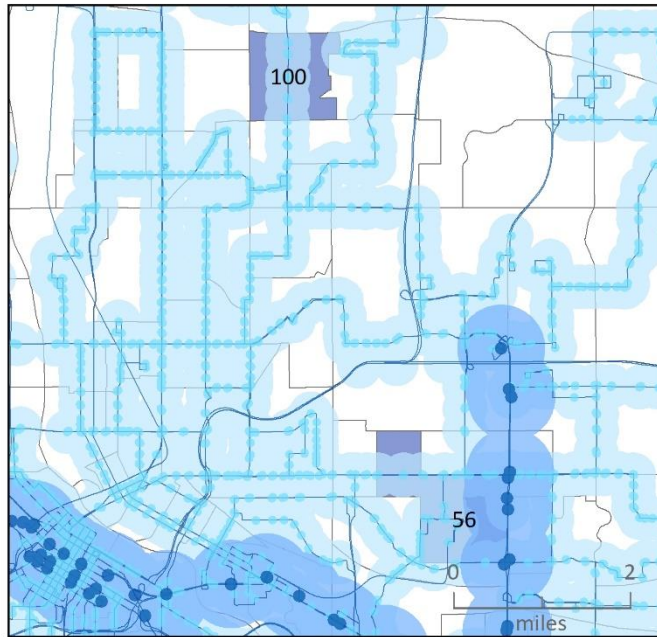


* English spoken less than "very well," ages 5 and older

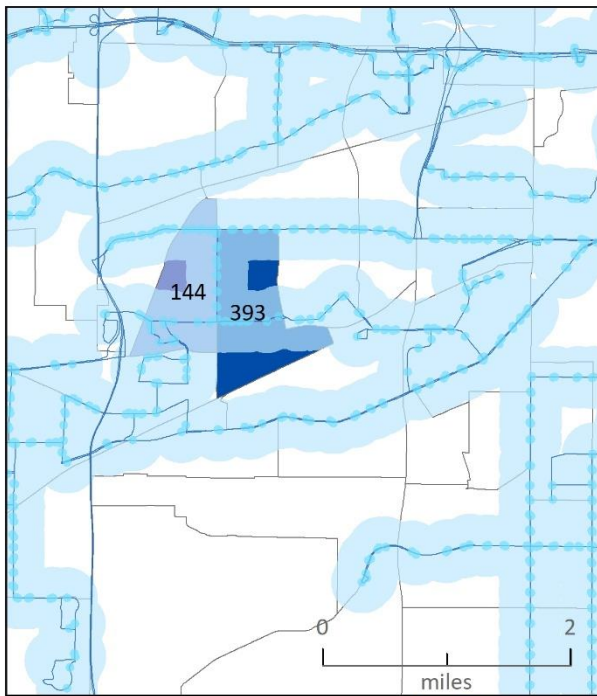
Figure 16 - Distribution of Limited English Proficiency – Other Indo-European March 2022

LEP Population Proximity to Transit
 Source: American Community Survey 2016-2020

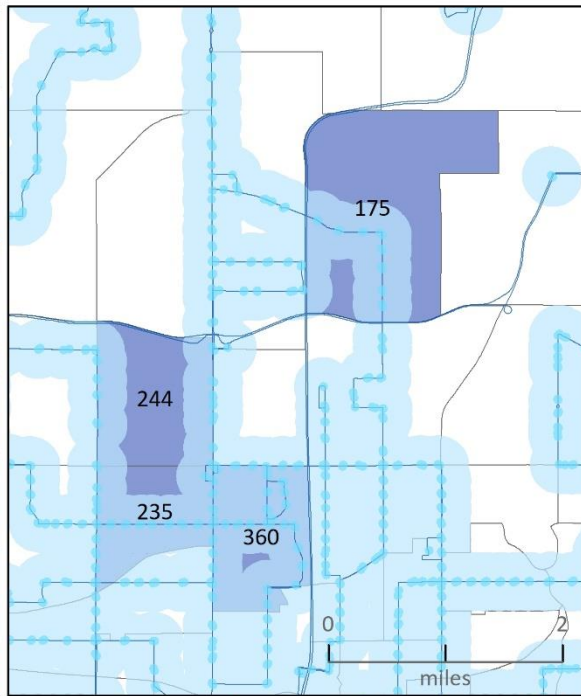
- 97 Census tract where population is greater than 3% LEP
- Count of LEP speakers
- Station
- Bus stop
- Transit route
- 1/2-mile buffer - station
- 1/4-mile buffer - bus stop



Area A: Minneapolis-Saint Paul and inner suburbs



Area B: West metro



Area C: Saint Paul and inner suburbs

**Distribution of Limited English Proficiency (LEP)*
 Other Indo-European Language Speakers
 March 2022 Service**



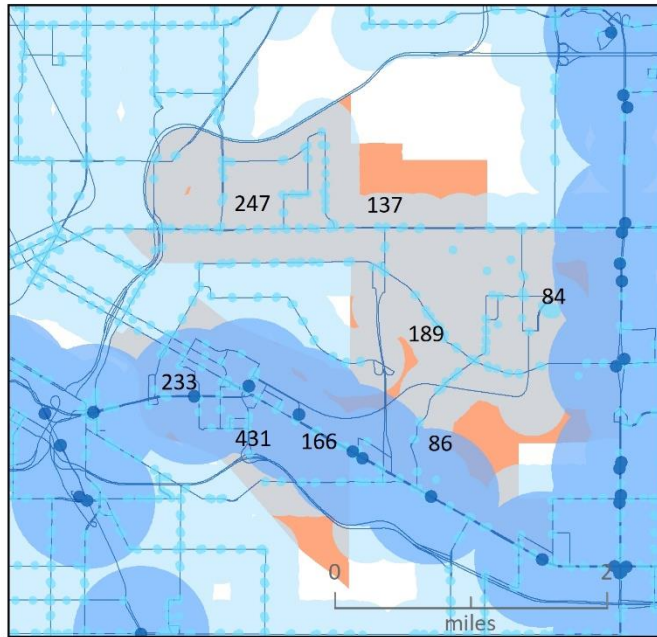
* English spoken less than "very well," ages 5 and older

Figure 17 - Distribution of Limited English Proficiency – Chinese March 2020

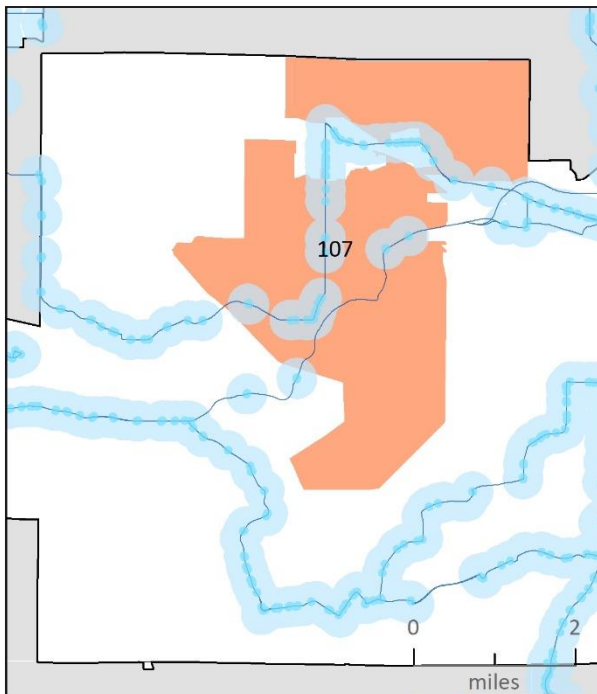
LEP Population Proximity to Transit

Source: American Community Survey 2016-2020

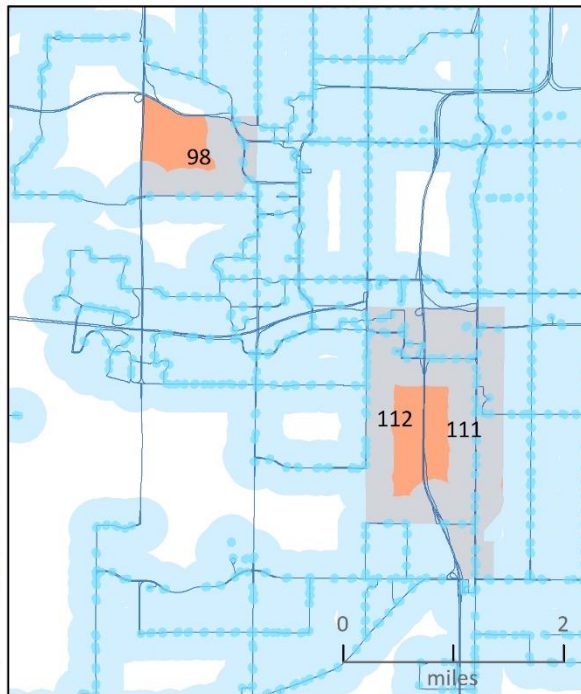
- 97 Census tract where population is greater than 3% LEP
- └─ Count of LEP speakers
- Station
- Bus stop
- Transit route
- 1/2-mile buffer - station
- 1/4-mile buffer - bus stop



Area A: Minneapolis-Saint Paul



Area B: West metro



Area C: South metro

**Distribution of Limited English Proficiency (LEP)*
Chinese Speakers (includes Mandarin and Cantonese)
March 2020 Service**



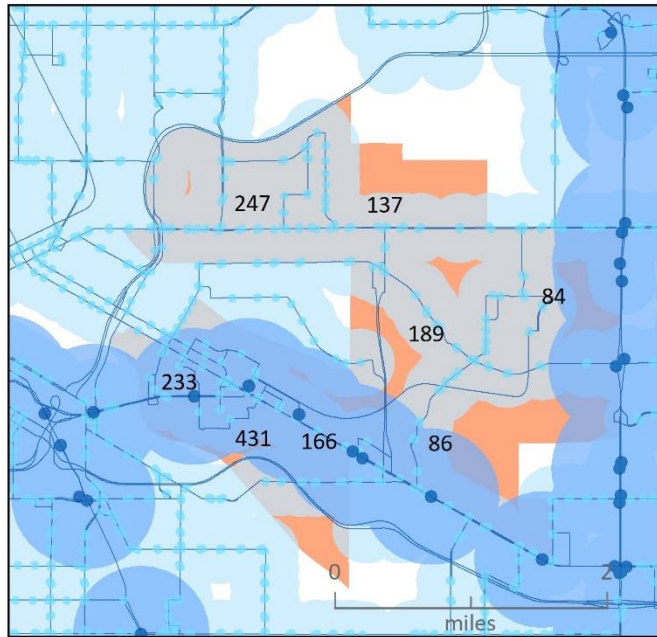
* English spoken less than "very well," ages 5 and older

Figure 18 - Distribution of Limited English Proficiency – Chinese March 2022

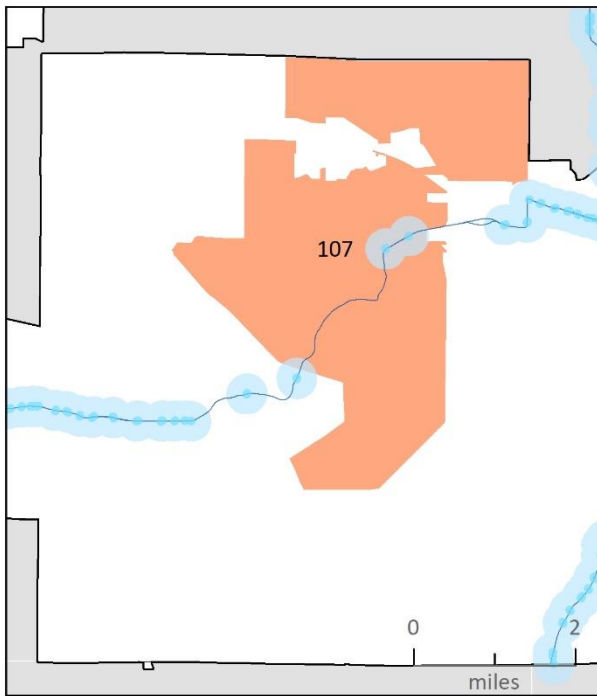
LEP Population Proximity to Transit

Source: American Community Survey 2016-2020

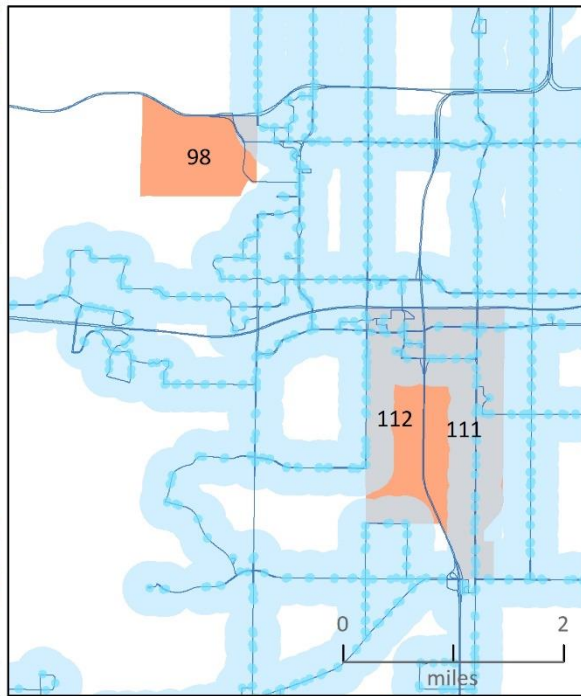
- 97 Census tract where population is greater than 3% LEP
- └─ Count of LEP speakers
- Station
- Bus stop
- Transit route
- 1/2-mile buffer - station
- 1/4-mile buffer - bus stop



Area A: Minneapolis-Saint Paul



Area B: West metro



Area C: South metro

**Distribution of Limited English Proficiency (LEP)*
Chinese Speakers (includes Mandarin and Cantonese)
March 2022 Service**



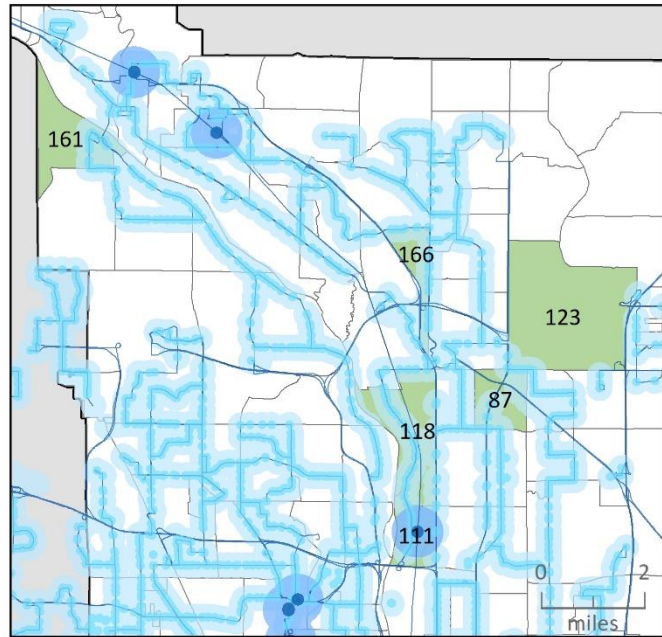
* English spoken less than "very well," ages 5 and older

Figure 19 - Distribution of Limited English Proficiency – Russian, Polish, other – March 2020

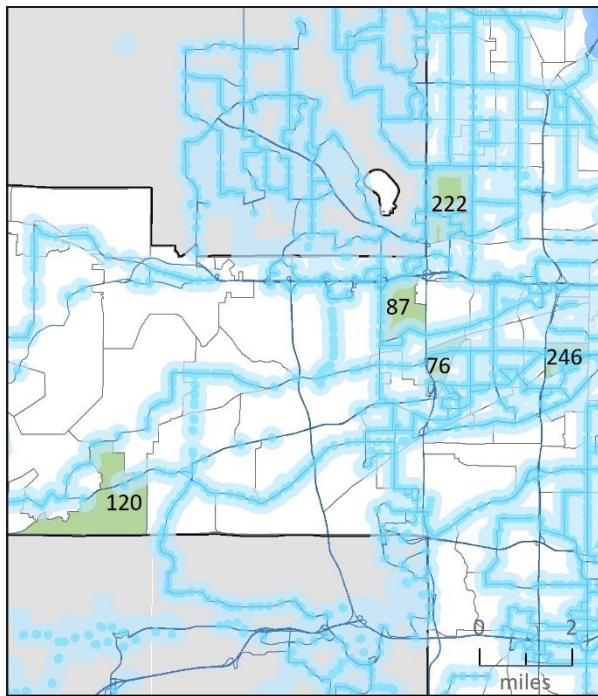
LEP Population Proximity to Transit

Source: American Community Survey 2016-2020

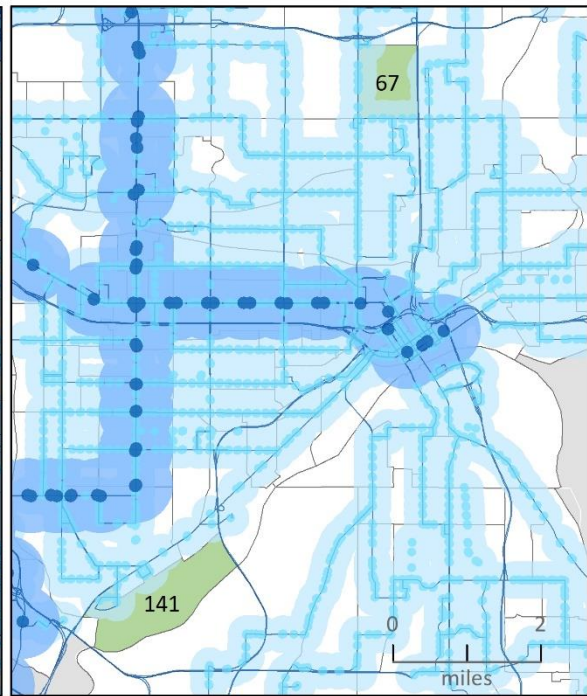
- 97 Census tract where population is greater than 3% LEP
- Count of LEP speakers
- Station
- Bus stop
- Transit route
- 1/2-mile buffer - station
- 1/4-mile buffer - bus stop



Area A: North and northwest metro



Area B: West metro



Area C: Saint Paul and inner suburbs

**Distribution of Limited English Proficiency (LEP)*
Russian, Polish, and Other Slavic Language Speakers
March 2020 Service**

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

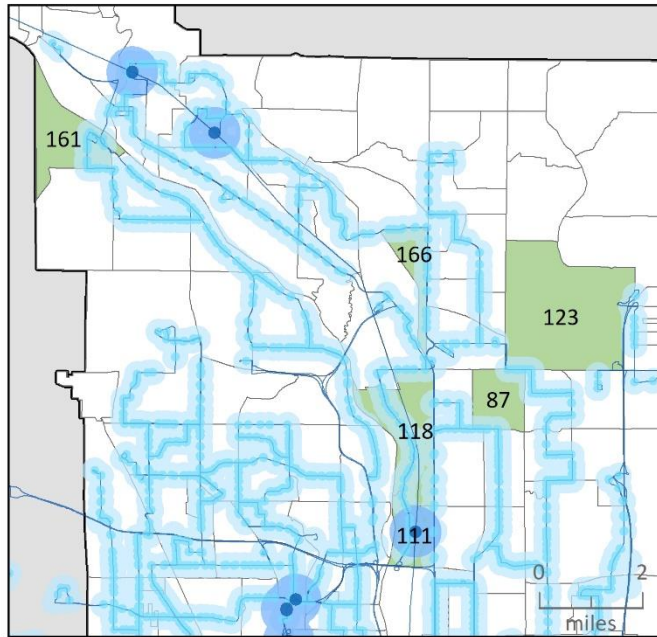


Figure 20 - Distribution of Limited English Proficiency – Russian, Polish, other – March 2022

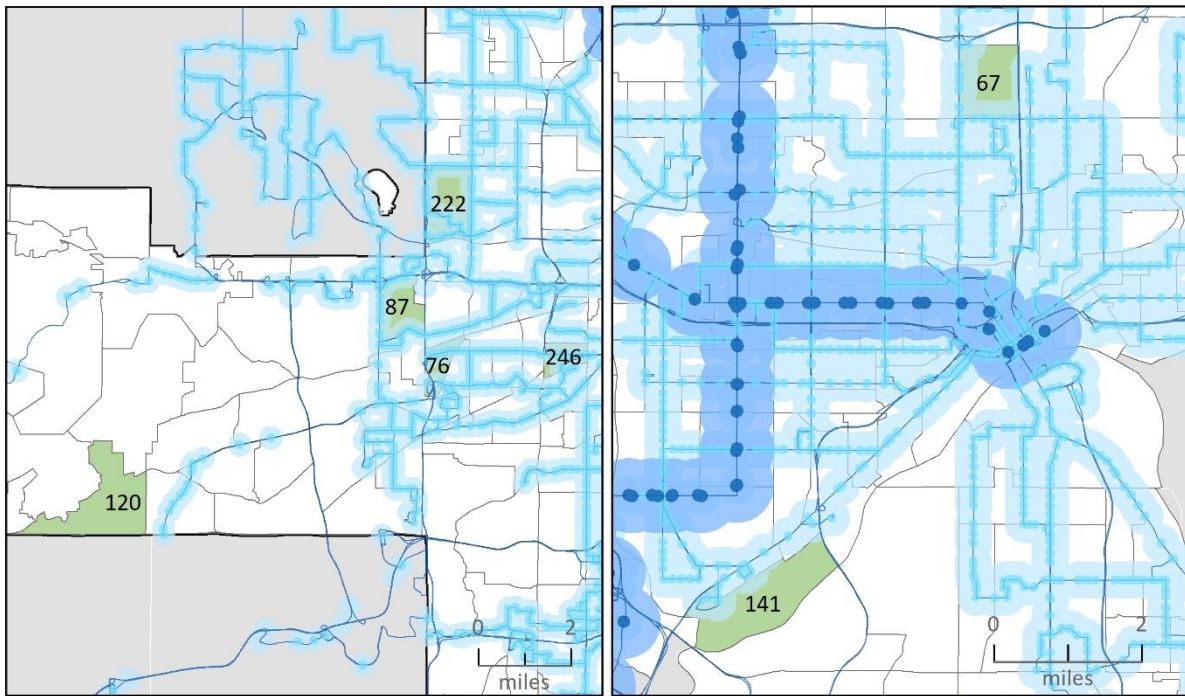
LEP Population Proximity to Transit

Source: American Community Survey 2016-2020

- 97 Census tract where population is greater than 3% LEP
- Count of LEP speakers
- Station
- Bus stop
- Transit route
- 1/2-mile buffer - station
- 1/4-mile buffer - bus stop



Area A: North and northwest metro



Area B: West metro

Area C: Saint Paul and inner suburbs

**Distribution of Limited English Proficiency (LEP)*
Russian, Polish, and Other Slavic Language Speakers
March 2022 Service**



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

Contact Center Data

Metro Transit Call Center support the conclusion that Metro Transit interacts most commonly with individuals who primarily speak Spanish, Somali, and Russian. For example, between June 2019-February 2022, the Call Center took 2177 calls from customers seeking interpreter services. The breakdown is listed below:

Language	Number of Calls
Spanish	1726
Somali	210
Russian	130
Hmong	20
Amharic	15
French	13
Vietnamese	11
Arabic	9
Farsi	8
Oromo	7
Swahili	6
Bengali	3
Kurmanji	3
Mandarin	3
Thai	2
Tigrigna	2
Japanese	2
Burmese	2
Khmer	1
Karen	1
Korean	1
Laotian	1
Portuguese	1
Total	2177

Supplemental Information

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

- In the first three quarters of 2021, Ramsey County Human Services reported 10,136 requests for interpretation. Four languages each comprised at least 5% of total requests and together accounted for 98% of all requests: Somali (38%), Karen (32%), Hmong (22%), and Spanish (6%). Burmese, Oromo, and Amharic were each a small portion (1% or less) of interpreter requests. No other languages besides English were reported in this period.
- Between May 2021 and April 2022, Hennepin County Human Services reported 818,767 minutes of telephonic translation requests through Language Line. Three languages each comprised at least 5% of total requests and together accounted for 89% of all requests: Spanish (44%), Somali (39%), and Hmong (6%). Oromo, Amharic, and Russian were each a small portion (1-2%) of translated minutes. Sixty-four other languages comprised the remaining 6% of translated minutes.
- The International Institute of Minnesota is among the leading providers of English language classes in the region. They reported 396 students enrolled in English classes in 2021. Five languages each comprise at least 5% of enrollment: Spanish (12%), Somali (12%), Amharic (9%), Oromo (5%), and French (5%). Forty-six other languages (including English) are reported among enrolled students.

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.

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

Nature and Importance of Transportation Services for Customers with limited English proficiency

Many persons who speak a primarily language other than English 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 there is sufficient evidence that at least 1,000 LEP individuals are likely to interact with Metro Transit services. Based on ACS data corroborated by public school EL enrollment, these languages are Spanish, Hmong, Somali, and Karen.

A secondary analysis revealed communities where collectively over 1,000 LEP Vietnamese speakers live near transit. These communities are dispersed throughout the service area, primarily in the suburbs but also in Saint Paul. LEP Vietnamese speakers are represented in data from K-12 public schools (364 EL students), IIMN (2% of enrollment), Hennepin County (1% of all minutes), and the

Metro Transit Call Center (11 calls).

This analysis also identified communities near transit where over 1,000 LEP persons speak “Other Indo-European languages.” These communities are primarily in the suburbs but also in Saint Paul. This language group consists of numerous languages, including Nepali, Pashto, Dari, Bengali, Kurmanji, and Farsi, which are all languages spoken in the region. However, each language comprises a relatively small portion of English learners at public schools (251 or fewer EL students), IIMN enrollement (2% or less of EL students), Hennepin County telephonic translations (0.52% or less of total minutes), and Metro Transit Call Center translations (3-8 calls).

Over 1,000 LEP Chinese speakers live in communities near transit, primarily near the University of Minnesota’s Minneapolis and Saint Paul campuses. International students enrolled at these institutions may not consider themselves to speak English “very well,” but they are required to demonstrate command of the English language to be admitted. To a lesser degree, LEP Chinese speaking communities also reside in the suburbs. Mandarin is the most prevalent Chinese language spoken in the service area, and LEP speakers are represented at public schools (211 EL students), at IIMN (2% of enrollment), among Hennepin County telephonic translations (0.21% of total minutes), and among Metro Transit Call Center translations (3 calls).

Similarly, over 1,000 LEP speakers of Russian, Polish, and other Slavic languages reside in communities near transit. These communities are almost entirely suburban, besides one tract in Saint Paul. Within this language classification, Russian is most prevalent in the service area. LEP Russian speakers are represented in public schools (109 EL students), at IIMN (1% of enrollment), among Hennepin County telephonic translations (1% of total minutes), and among Metro Transit Call Center translation requests (130 calls).

There is demonstrable evidence that at least 1,000 LEP Vietnamese speakers interact with Metro Transit services and would benefit from vital document translation. Among the various languages analyzed, Vietnamese is the only singular language where LEP communities clearly exceed the 1,000-person threshold near transit.

Primarily due to the limitations of ACS data that aggregates multiple languages, and secondarily due to lower EL student enrollments, there is insufficient evidence to demonstrate that over 1,000 LEP persons speaking languages of Mandarin, Russian, and other Indo-European languages interact with Metro Transit services. To translate vital documents in these languages would not likely constitute a significant enhancement to service access.

Review of smaller LEP communities do not show more than 1,000 LEP persons living near transit that speak French, Arabic, Korean, or Tagalog. Data collected from other supplemental sources provide further evidence that vital document translation for these languages would not meaningfully enhance access to service.

Therefore, vital documents will be translated into Spanish, Hmong, Karen, Somali, and Vietnamese. There are no plans to translate vital documents into other languages. However, translation of transit route-level materials will be considered as appropriate.

Resources Available & the Costs of Providing Language Assistance Services

The principal resources available to the Council’s Transportation services for providing language

assistance to Customers with limited English proficiency are Metro Transit's website, fare machines located at various transit centers, its customer service phone lines, translated materials, and its Customer Advocate program.

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 Transitsite.

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.

Interpretation Services

Metro Transit's Call Center staff uses Language Line to facilitate phone interactions with Customers with limited English proficiency. Language Line can provide language interpretation services for over 240 different languages. Recently, a text to transit information option was added and that feature offers a translation option that supports 60 languages. In addition, Metro Transit also offers, upon request, interpreters for community meetings.

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.

Outreach Coordinators

Metro Transit Outreach Coordinators 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 populations with limited English proficiency. Metro Transit helps make these workshops linguistically accessible to Populations with limited English proficiency by partnering with the requesting community group, which often provides interpretation services.

These services involve several 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 populations with limited English proficiency. Where applicable, Metro Transit will provide funds to enhance its language services.

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 Customers with limited English proficiency, 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 Customers with limited English proficiency and Metro Transit customer service staff. Language Line can provide language interpretation services for over 240 different languages.
- Interactive Voice Response (IVR) system offers automated messages in Spanish to Customers with limited English proficiency 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 Outreach Coordinators 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 Customers with limited English proficiency in order to identify

potential areas of need for language assistance.

- Advertising its services via radio and television to communities that speak languages other than English.
- Metro Mobility uses several strategies to provide language assistance for Customers with limited English proficiency, including:

Current LEP Outreach

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.

Language Line

The public, including Customers with limited English proficiency, can contact Metro Transit's Call Center. Metro Transit utilizes Language Line to provide phone interpreters for Customers with limited English proficiency who wish to speak with a Call Center representative. Language Line provides interpretation services in over 240 languages.

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. In 2021 Metro Transit entered into year-long contracts with nine ethnic and multilingual media for the to provide regular in language advertising

Outreach Coordinators

Metro Transit Outreach Coordinators provide free presentations and personalized how-to-ride classes to groups throughout Metro Transit's service area. During these classes, Outreach Coordinators teach groups several things including:

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

In addition to these presentation topics, Outreach Coordinators 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. Outreach Coordinators 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)/populations with limited English proficiency, 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 Outreach Coordinators is a native Spanish speaker. In addition, Outreach Coordinators partner with the requesting community group, which provides interpretation services.

Metro Transit Outreach Coordinators have a broad network of partner organizations that extends to approximately 90 organizations that each serve English language learners. This network is constantly growing as more partnerships are established.

Since the last Title VI update, Metro Transit's Outreach Coordinators provided trainings to over 40 groups that serve Customers with limited English proficiency. In total, our Outreach Coordinators estimate that they have reached hundreds of Customers with limited English proficiency through this outreach.

Rider Surveys

Metro Transit translates all rider surveys into Spanish and uses a call-back feature to connect survey respondents of other languages with a Language Line representative.

Future Strategies to Better Serve Customers with limited English proficiency

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

OEEO 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:

1. Metro Transit will be implementing direct response interpretation services for Limited English Proficiency (LEP) customers wishing to speak to a Metro Transit's Transit Information or Customer Relations representatives through its main number 612-373-3333. This service allows customers to select their preferred language at the start of their call and connect directly with an interpreter to assist with their call. The following languages will be supported:
 - Spanish
 - Somali
 - Russian
 - Hmong
 - Vietnamese
 - Karen

Customers seeking support in other languages can still utilize interpretation services by connecting with Transit Information or Customer Relations Rep and requesting an interpreter.

2. Metro Transit will also be exploring the potential of adding Vietnamese, Hmong, and Russian to its NexTrip and Go-To Car automated phone line.

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 Contact Centers for utilizing the services of Language Line to help facilitate meaningful interactions with Customers with limited English proficiency. 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.

Soon, Metro Transit Contact Center staff will be provided a training on demographic trends in the Metro Transit service area, as well as individual training for staff on customer service while providing language assistance.

Current efforts are underway to implement language classes in an online format. Furthermore, Metro Transit Police has offered Spanish classes to Police Officers in the past to help them interact with Spanish speaking customers. These courses were 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 & Updated the Language Assistance Plan

The Council conducts internal monitoring of its language assistance practices ensuring 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 Populations with limited English proficiency with whom they come in frequent contact.

The Council is committed to continuously improving its Language Assistance Plan. To that end, the agency 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

Attachments

The following attachments are samples of translated documents.

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.

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 Mục VI.

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 xariirta faquuqa, ama si aad wax badan uga ogaato waxyaabo ku saabsan waajibaadyada Title VI.

မြန်မာနိုင်ငံတော်သည် လူမျိုး၊ နိုင်ငံခြားဖွား၊ မွေးမြူရေးနှင့် လူမှုအုပ်စုအရပ်ရပ်ကို ခွဲခြားခြင်းမရှိဘဲ အစီအစဉ်များကို အကောင်အထည်ဖော် ဆောင်ရွက်သည်။ မြန်မာနိုင်ငံတော်သည် လူမျိုး၊ နိုင်ငံခြားဖွား၊ မွေးမြူရေးနှင့် လူမှုအုပ်စုအရပ်ရပ်ကို ခွဲခြားခြင်းမရှိဘဲ အစီအစဉ်များကို အကောင်အထည်ဖော် ဆောင်ရွက်သည်။

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 peb kom ua ntaub ntawv tsis txaus siab, los sis yog xav paub ntxiv txog cov tes dej num ntawm txoj cai Title VI.

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

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



10/17/2018

B. Summer Student Pass flyer

Vietnamese translation of a flyer promoting the Summer Student Pass



Nhận những chuyến đi xe buýt và trên đường sắt hạng nhẹ giá trị trong mùa hè với Thẻ Xe Mùa Hè Dành Cho Học Sinh!

Bất kỳ học sinh nào hiện đang học lớp 9-12 tại các trường tham gia có thể nhận các chuyến đi xe buýt và tàu hỏa không giới hạn có giá trị lên đến \$3,25*. Các thẻ xe có hiệu lực từ ngày 1 tháng 6 đến hết ngày 6 tháng 9 năm 2022.

Tôi nhận thẻ xe như thế nào?

Bắt đầu từ ngày 9 tháng 5, hãy truy cập metrotransit.org/summer-pass để biết thêm thông tin chi tiết về thẻ xe và đặt mua thẻ xe bằng cách sử dụng thẻ tín dụng. Tất cả thông tin cần được cung cấp bao gồm tên trường và số ID học sinh của quý vị.

Nếu muốn thanh toán bằng tiền mặt, quý vị có thể mua Thẻ Xe Mùa Hè Dành Cho Học Sinh tại Trung Tâm Dịch Vụ Chuyển Tuyến Metro. Gọi số 612-373-3333 hoặc truy cập metrotransit.org/service-centers để tìm kiếm các địa điểm.

Quý vị có thắc mắc? Một chuyên gia về chuyển tuyến thân thiện có thể trả lời chúng. Hãy gọi cho chúng tôi theo số 612-373-3333.

* Đối với các vé xe có giá trị lớn hơn \$3,25, như một vé chuyến đi Northstar, chỉ cần thêm tiền từ quỹ vào thẻ xe của quý vị.



61-23548203-22

C. Route 6 postcard

Changes coming to Route 6 in 2025.
Share your feedback!

COMMENT BY APRIL 8

metrotransit.org/E-Line-Project



Se harán cambios a la Ruta 6 en el 2025.
Haga sus comentarios ahora.

Cov kev hloov yuav muaj rau Kab Kev 6 thaum 2025. Tawm ncauj lus tam sim no.

Isbedelo ayaa lagu sameyn doonaa tubta 6 (route 6) sannadka 2025. Hadda faallo ka bixi arrintaa.



D. B Line fact sheet

Customer information about the B Line translated into Somali.

Khadka METRO B

Gadiidka degdega ah ayaa imanaya wadada 21

Khadka METRO B waa khad Transit Bas ah oo la qorsheeyay kaas oo bixin doona adeeg dhakhso leh oo lagu kalsoonaan karo oo ah marinka Wadada 21. Bus Rapid Transit waa xirmo ka mid ah kor u qaadista nasashada-ka oo ku daraya safar deg deg ah iyo khibrad soo hagaagtay oo ku saabsan marinnada basaska ugu mashquulka badan ee Metro Transit.



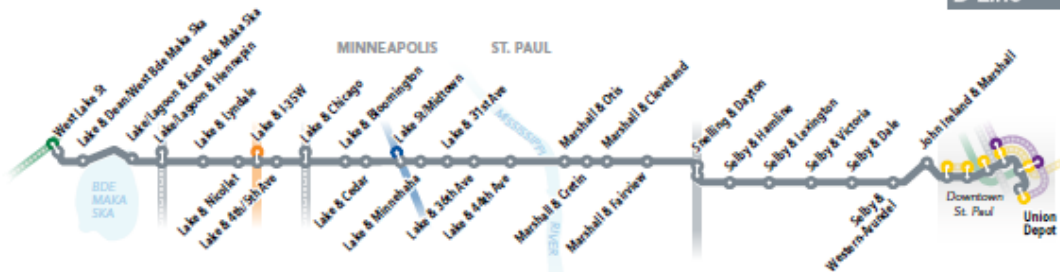
Isbeddelada ku imanaya Wadada 21

Wax badan ka ogoow oo faallo ka bixi hada metrotransit.org/b-line-project ama adigoo iimayl noogu soo dirayo BLine@metrotransit.org

Khadadka METRO B wuxuu hagaajin doonaa marinka mashquulka badan:

- Wadada 21 waa wadada labaad ee ugu mashquulka badan, celcelis ahaan in ka badan 10,000 oo fardooley ah maalintii ka hor faafida cudurka
- Wadada 21 saaran ayaa wali xoog badan, xitaa inta lagu jiro aafada cudurka
- Shantii qof ee kusafreysa wadada lagta waxay isticmaalan Transit
- Wadada lagta waa mid ka mid ah marinnada ugu gaabiska badan ee taraafikada sababo laydhadhka taraafikada, joogsiyada basaska ee joogtada ah iyo dadka safafka u gala basaska.

Ka eeg khariidad faahfaahsan halkan
metrotransit.org/b-line-project



JADWALKA MASHRUUCA HORDHACA AH (la beddeli karo)

• 2019-2020	• 2021-2022	• 2023-2024	• 2024
QORSHEEYNTA	INJINEERNIMADA	DHISMAHA	ADEEGA WAA FURANYAHAY

XIRIIRKA MASHRUUCA:
Cody Olson
BLine@metrotransit.org
612-248-0642



11.06.2019.22

E. Quarterly service change advertising

Digital ad about upcoming quarterly service changes in Spanish



**Los cambios de
servicio comienzan el
sábado 26 de marzo.**

El servicio en su comunidad
será más fiable.



F. Commuter Options flyer

Flyer promoting the services of Commuter Programs translated into Somali



Metro Transit waxa ay leedahay barnaamijyo iyo adeegyo badan oo kaa caawinaya hagaajinta safarka shaqaalahaaga ay shaqada ku tagayaan iyo barnaamijyada dheefaha dadka shaqada u safra ayagoo aan wax kharash laga qaadin ururkaaga ilaa aad doorato inaad kabiso mooyaane. Shirkaddaadu waxay ku heli kartaa abaal-marinahaas iyo barnaamijka dheefaha dadka shaqada u safra oo badan:

- Inay soo jiitaan ayna haystaan shaqaale wanaagsan oo wata xirmo dheefooyin dhammaystiran
- Kordhiso wax soo saarka shaqaalaha iyo niyadda adiga oo kor u qaadaya caadooyinka safarka ee kaydiya lacagta iyo wakhtiga lagu xayirmo gaadiidka
- Yareyso cashuuraha mushaharka ayada oo u oggolaanaysa shaqaalaha inay isticmaalaan doollarka cashuurta horaan la xisaabiyo si ay ugu bixiyaan ikhtiyaarrada gaadiidka
- U muujiso sida ay kaaga go'an tahay deegaanka adiga oo ku dhiirigeliya shaqaalaha inay isticmaalaan ikhtiyaarrada gaadiidka ee yareynaya qiiga gaaska kasoo baxa aqalka dhirta lagu koriyo

ABUURITAANKA XIRMADA DHEEFAHA DADKA SHAQADA U SAFRA EE LA HABEEYAY

Marka aad diyaar u tahay inaad qaado tillaabada xigta, khubarada wacyigelinta loo-shaqeeyaheena waxay abuuri doonaan qorshe la habeeeyey, iyaga oo ka dooranaya kuwan sida fudud loogu dari karo:

- Barnaamijyada gaadiidka oo ay ku jiraan Metropass iyo Go-To Cards
- Raacis bilaash ah si ay uga caawiso ku xidhista shaqaalaha iyo kuwa kale ee raba inay baabuur wada racaan
- Metro Vanpool ee loogu talagalay shaqaalaha leh safar dheer si ay u soo shaqeeyaan
- Guaranteed Ride Home, kaas oo hubiya in dadka shaqada u safra ay u raacaan guriga haddii ay qabaan xaalad qoyska oo degdeg ah, jirro shaqsiyeed, ama u baahan inay si lama filaan ah u shaqeeyaan xilli danbe

- Barnaamij baarkin la doorbiday ama qiimo dhimis loogu sameeyay shaqaalaha wadaaga gaadiidka ay shaqada ku aadaan
- Hagida barnaamijka shaqada la qabto ayadoo guriga la joogo

SIDAAN KU CAAWIN KARNA

Waxaanu kula shuraakoobaynaa shirkaddaada si aanu u abuurno xidhmo la habeeeyey oo leh dheefo gaadiid. Marka aad haysato qorshe waxaanu kula shaqayn doonaa si aan u fulino una horumarino barnaamijyadaada si loo helo natiijooyinka ugu badan.

TALAABOYINKA XIGA

Markaad diyaar u tahay inaad wax badan ka ogaato, kala xidhiidh Barnaamijyada Dadka Shaqada U safra tenille.warren@metrotransit.org.

06-04-2020/22

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 Duinck

Councilmember Edward Reynoso
Councilmember John Đòan
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, Duinck, Reynoso, Đòan, 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, Duinck, Reynoso, Đòan, 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, Duinck, Reynoso, Đòan, 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 Saint 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

Council Members

Metropolitan Council

Council Chair Charles Zelle Abdirahman Muse Deb Barber Kris Fredson Molly Cummings Phillip Sterner Reva Chamblis
Susan Vento Chai Lee Francisco J. Gonzalez Lynnea Atlas-Ingebretson Peter Lindstrom Raymond Zeran Robert Lilligren Wendy Wulff Christopher Ferguson Judy Johnson

Meeting Minutes

Wednesday, June 23, 2021 4:00 p.m. Council Chambers

IN ATTENDANCE

Barber, Chamblis, Cummings, Gonzalez, Fredson, Ferguson, Johnson, Lee, Lilligren, Muse, Sterner, Vento, Wulff, Zeran, Chair Zelle

Committee Members Absent:

Atlas-Ingebretson, Lindstrom

CALL TO ORDER

A quorum being present, Chair Zelle called the meeting to order at 4:01 p.m. on the following roll call vote:

Aye: 14 Barber, Chamblis, Cummings, Fredson, Gonzalez, Johnson, Lee, Lilligren, Muse, Sterner, Vento, Wulff, Zeran, Chair Zelle Nay: 0 Absent: 2 Atlas-Ingebretson, Lindstrom Not Recorded: 1 Ferguson

AGENDA APPROVED

Chair Zelle noted that a roll call vote is not needed for approval of the agenda. Council Members did not have any comments or changes to the agenda.

APPROVAL OF MINUTES

The minutes were moved by Sterner, seconded by Cummings. **Motion carried** on the following roll call vote:

Aye: 15 Barber, Chamblis, Cummings, Ferguson, Fredson, Gonzalez, Johnson, Lee, Lilligren, Muse, Sterner, Vento, Wulff, Zeran, Chair Zelle Nay: 0 Absent: 2 Atlas-Ingebretson, Lindstrom

CONSENT AGENDA

Approval of the Consent Agenda (Items 1-16) Consent Agenda Adopted Page - 1

That the Metropolitan Council authorize the Regional Administrator to negotiate and execute METRO Gold Line Bus Rapid Transit (Gold Line) Subordinate Funding Agreement (SFA) Number Two with the Office of MN.IT Services (MNIT) in an amount

2021-99: not to exceed \$2,497,770.35.

That the Metropolitan Council authorizes the Regional Administrator to award and execute contract 20P055 with TKDA, for Heywood Office Upgrades project for necessary upgrades to the 1984 Heywood Office in a not to exceed the amount of

2021-118: \$800,000.

2021-121:

That the Metropolitan Council authorize, award and execute sole source contract 21P148 with Ubisense America LLC, in the amount not to exceed \$1,259,428 for Garage Hardware Replacement.

2021-126:

That the Metropolitan Council:

- Approve a grant from the Parks and Trails Legacy Fund of up to \$459,375 to Three Rivers Park District to acquire the vacant rural residential 27.87-acre Olson property adjacent to Gale Woods Farm, just west of Woodedge Road in Minnetrista, for Gale Woods Farm Special Recreation Feature.
- Authorize the Community Development Director to execute the grant agreement and restrictive covenant on behalf of the Council

2021-127:

That the Metropolitan Council adopt Revision 2 of the Metro Transit Agency Safety Plans for Bus and LRT (including the safety target goals) as required by 49 CFR Part 673.

2021-128:

That the Metropolitan Council authorize the Regional Administrator to execute a sole-source Contract 21P173 with Cubic Transportation Systems to provide new ticket vending machine bill note acceptor upgrade kits in an amount not to exceed \$1,360,000.

2021-130:

That the Metropolitan Council adopt the attached Advisory Comments and Review Record and take the following actions:

- Authorize Dakota County to place its comprehensive plan amendment into effect.
- Find that the amendment does not change the County's forecasts.
- Advise the County to implement the advisory comments in the Review

2021-131:

That the Metropolitan Council: 1.

Approve the Amended Edina Affordable Housing Partnership as described in this Business Item.

Authorize the Community Development Executive Division Director to negotiate and execute:

- a. A 25-year forgivable loan agreement with the City of Edina or the Edina Housing and Redevelopment Authority; and (b) other documents necessary to implement this affordable housing partnership initiative. 3. Authorize the Community Development Executive Division Director to execute purchase agreements and related agreements/documents necessary for the purchase of the homes.

Authorize the Community Development Executive Division Director to execute purchase agreements and related agreements/documents necessary for the purchase of the homes.

2. 3. **2021-133:**

That the Metropolitan Council authorize the Regional Administrator to: Page - 2 | METROPOLITAN COUNCIL

Enter into an agreement with the State of Minnesota Department of Transportation (MnDOT) for Calendar Year 2022 to provide funding for public commuter rail service in Sherburne County, Minnesota, for an amount up to \$1.9 million per year.

Execute the attached Resolution of the Governing Body (Metropolitan Council) to enter into an Agreement with the State of Minnesota Department of Transportation

• for Calendar Year 2022.

• **2021-134:**

That the Metropolitan Council authorize the Regional Administrator to:

1. Execute a one-year extension of the Upass agreement with the University of Minnesota for student participants for the period of August 31st, 2021 to August 31st, 2022, and,
2. Execute a one-year extension of the Metropass agreement with the University of Minnesota for staff and faculty participants for the period of October 1st, 2021 to September 31st, 2022, and,
3. Execute a one-year extension of the Campus Zone Pass agreement with the University of Minnesota for staff and faculty participants for the period of August 31st, 2021 through August 31st, 2022.

2021-135:

That the Metropolitan Council authorizes its Regional Administrator to award and execute a contract to SKB Environmental, Inc. (SKB) for contingency transport and disposal of dewatered sludge for a total award not to exceed \$3,400,000.

2021-136:

That the Metropolitan Council authorize its Regional Administrator to execute a contract amendment with UHL Co. Inc. for an amount not to exceed \$100,000 for additional HVAC, piping, mechanical, and sheet metal services for all MCES locations, Contract 15P114.

2021-137:

That the Metropolitan Council authorize its Regional Administrator to execute a contract amendment with Corval Constructors Inc. for an amount not to exceed \$1,400,000 for additional mechanical pipefitting services for all MCES locations, Contract 15P113.

2021-139:

That the Metropolitan Council establish a date to conduct a public hearing to discuss and receive comment on the 2022 Public Housing Agency (PHA) Plan. The hearing will take place on August 16, 2021, at 4:00 PM via electronic means.

2021-144:

That the Metropolitan Council authorizes an amendment to the design contract with HNTB Corporation in the amount of \$319,138 for additional design and construction support services of the Orange Line.

2021-148:

That the Metropolitan Council approve resolution 2021-16 authorizing the Regional Administrator to apply for Section 5311 Formula Grants for Rural Areas funding for 2022 from the Minnesota Department of Transportation to support Transit Link service.

It was moved by Chamblis, seconded by Sterner. **Motion carried** on the following roll call vote: Aye: 15 Barber, Chamblis, Cummings, Ferguson, Fredson, Gonzalez, Johnson, Lee,

Lilligren, Muse, Sterner, Vento, Wulff, Zeran, Chair Zelle Page - 3 | METROPOLITAN COUNCIL

BUSINESS

Nay: 0 Absent: 2 Atlas-Ingebretson, Lindstrom **Community Development 2021-141:**

Award Amount

That the Metropolitan Council: 1. Award three Livable Communities Demonstration Account Pre-Development grants totaling \$275,000 as shown in the table below. 2. Authorize its Community Development Division Director to execute the grant agreements on behalf of the Council.

City of Saint Paul	The Rondo Restorative Development Overlay District	\$150,000
Brooklyn Park EDA	Innovation Hub	\$50,000
City of Minneapolis	Chicago-Lake Rebuild	\$75,000

Council Member Wulff shared that she had concerns about the Saint Paul project being held to a different standard than other projects and thus would be voting no. Council Member Fredson urged Council members to support the Rondo land bridge project as a step to help reunite the community and reconnect the neighborhood.

It was moved by Lilligren, seconded by Fredson.

Motion carried on the following roll call vote:

Aye: 14 Barber, Chamblis, Cummings, Ferguson, Fredson, Gonzalez, Johnson, Lee, Lilligren, Muse, Sterner, Vento, Zeran, Chair Zelle

Nay: 1 Wulff

Absent: 2 Atlas-Ingebretson, Lindstrom

2021-142: That the Metropolitan Council:

1. Award two Livable Communities Demonstration Account Transit-Oriented Development Pre-Development grants for \$202,500 as shown in the table below.
2. Authorize its Community Development Division Director to execute the grant agreements on behalf of the Council.

City of Minneapolis	3030 Nicollet	\$150,000
City of Saint Paul	990 Payne	\$52,500

It was moved by Lilligren, seconded by Johnson.

Motion carried on the following roll call vote:

Aye: 15 Barber, Chamblis, Cummings, Ferguson, Fredson, Gonzalez, Johnson, Lee, Lilligren, Muse, Sterner, Vento, Wulff, Zeran, Chair Zelle

Nay: 0

Absent: 2 Atlas-Ingebretson, Lindstrom

Environment – Reports on consent agenda

Management – No reports

Transportation

2021-117: That the Metropolitan Council approve the service changes in the METRO Orange Line Connecting Bus Study Recommended Plan for implementation with the opening of the Orange Line BRT projects, and related Title VI analysis.

Cyndi Harper, Senior Manager, Route Planning, gave an overview of service changes recommended by METRO Orange Line Connecting Bus Study the in conjunction with the opening of the METRO Orange Line late this year. The goal of the METRO Orange Line is to link residents, jobs and services; retain existing riders and grow ridership; prioritize service for those who rely on transit; and simplify route network and enhance mobility. Outreach strategies for the public input process included: website, survey, and video presentation; social, ethnic, and local media; virtual community meetings and public hearings; and a postcard mailer. The team received nearly 600 comments and overall support for the Orange Line BRT. Stakeholders were pleased that Concept Plan includes coverage on all local branches of Route 535, which will be replaced by the Orange Line BRT. They also supported restoring service on two routes currently suspended due to the pandemic, simplifying four routes so that all trips follow the same routing, and improving frequency on seven routes. Areas of concern included the proposal to eliminate two parts of Route 515, as well as eliminating service on 90th Street in west Bloomington.

Council Member Cummings commended Harper and the rest of the team on their excellent outreach within the district. Council Member Barber also thanked Harper and the team for their work and for taking in consideration the long-term impacts of this project.

It was moved by Barber, seconded by Cummings.

Motion carried on the following roll call vote:

Aye: 15 Barber, Chamblis, Cummings, Ferguson, Fredson, Gonzalez, Johnson, Lee, Lilligren, Muse, Sterner, Vento, Wulff, Zeran, Chair Zelle

Nay: 0

Absent: 2 Atlas-Ingebretson, Lindstrom

2021-132: That the Metropolitan Council (Council) authorize the Regional Administrator through the Southwest Light Rail Transit (SWLRT) Council Authorized Representative to negotiate and execute a change order for Contract 17P000 with Aldridge – Parsons, a Joint Venture (APJV) in an amount not to exceed \$8,972,046.95 for up to three years of storage for manufactured light rail system components.

It was moved by Barber, seconded by Cummings.

Motion carried on the following roll call vote:

Aye: 15 Barber, Chamblis, Cummings, Ferguson, Fredson, Gonzalez, Johnson, Lee, Lilligren, Muse, Sterner, Vento, Wulff, Zeran, Chair Zelle

Nay: 0

Absent: 2 Atlas-Ingebretson, Lindstrom

2020-295: That the Metropolitan Council authorize the Regional Administrator to execute operating grant agreements for the calendar year 2021 with the Funding Transitway Counties of Anoka, Hennepin, and Ramsey to receive funds in 2021.

- METRO Blue Line LRT \$13,896,218
 - Hennepin County - \$13,896,218
- METRO Green Line LRT \$14,393,393
 - Hennepin County – \$8,636,036
 - Ramsey County – \$5,757,357
- Northstar Commuter Rail \$3,760,810
 - Anoka County – \$3,061,531
 - Hennepin County – \$699,279

It was moved by Barber, seconded by Wulff.

Motion carried on the following roll call vote:

Aye: 15 Barber, Chamblis, Cummings, Ferguson, Fredson, Gonzalez, Johnson, Lee, Lilligren, Muse, Sterner, Vento, Wulff, Zeran, Chair Zelle

Nay: 0

Absent: 2 Atlas-Ingebretson, Lindstrom

INFORMATION

1. Information Item: Southwest LRT Project Update

Jim Alexander, SWLRT Project Director, Metro Transit, gave a quarterly Southwest Light Rail Transit (SWLRT) project update. Current civil construction challenges include the Corridor Protection Wall as required per BNSF agreement; and the Secant Wall, an alternative construction method necessary due to unforeseen soil conditions. These issues impact other SWLRT contracts and the overall project schedule. The next steps are to begin construction on the Corridor Protection Wall, complete change order processes in the Kenilworth Tunnel, and update the project schedule. The project schedule will determine impacts to Civil, Systems, and SCADA contracts. Alexander then shared photos of current SWLRT construction progress. Council Member Cummings suggested that Council members who do not live near the SWLRT construction area take a tour of the ongoing construction. Tours are offered by the Southwest Project Office.

Jon Tao, EO Consultant III in the Office of Equal Opportunity (OEO) gave a SWLRT DBE and Workforce Update. SWLRT contracts continue to exceed DBE goals. The overall DBE achievement is 20% as of April 30, 2021. Civil DBE participation is at 20.5%, and Systems DBE participation is at 16.1%. Franklin DBE participation is at 19.8%, which is on target; this is anticipated to remain the same for the remainder of the contract which expires at the end of the year. The DBE/Workforce Advisory

Committee held a Subcontractor Workforce Participation Discussion; participants included Standard Contracting, RailWorks/DELTA Joint Venture, Minger Construction, Pete's Water and Sewer, E&J Rebar, and Egan. Sam O'Connell, Senior Manager, Community Affairs, gave a Communications and Outreach update. Weekly construction update emails are sent to more than 17,000 subscribers with a 46% open rate. The Twitter account has more than 1400 followers. Information is also shared in Construction Information Workgroups, property owner meetings, and corridor tours. SWLRT updates are available on Twitter, Flickr, Facebook, and Instagram.

Council Members did not have any questions or comments.

REPORTS

Council Members:

Council Member Chamblis, along with staff, will be hosting a listing session on the Blue Line Extension at 6:00pm on June 29.

Council Member Cummings shared that she attended the celebration for new Metro Transit Police officers being sworn in, those being promoted, and five new canine officers. She congratulated the staff as well as the new graduates. Council Members Wulff and Ferguson were also in attendance.

Chair: Chair Zell participated in a series called "Time of Reckoning," representing the Metropolitan Council in a discussion of community leaders helping to address inequities in our community.

Regional Administrator: No report.

General Counsel: No report.

The meeting was adjourned at 5:28 p.m.

Certification

I hereby certify that the foregoing narrative and exhibits constitute a true and accurate record of the Metropolitan Council Meeting of June 23, 2021.

Approved this _____ day of _____, 2021.

Bridget Toskey
Recording Secretary

Title VI Service Equity Analysis

METRO Orange Line & Connecting Bus Study

May 2021



Prepared by:



Introduction and Background

The Metropolitan Council pledges that the public will have access to all its programs, services, and benefits without regard to race, color, or national origin, in accordance with Title VI of the Civil Rights Act of 1964. This pledge applies to Metro Transit, an operating division of the Metropolitan Council.

Requirement to Conduct a 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 and for any new fixed guideway capital project. The intended purpose of such analyses is to evaluate service changes at the planning stage to determine whether those changes might have a discriminatory impact based on race, color, national origin, or income.

The METRO Orange Line is a 17-mile planned highway Bus Rapid Transit (BRT) line that will connect Minneapolis, Richfield, Bloomington, and Burnsville along I-35W. Orange Line passenger service is anticipated to begin late 2021. As a new fixed guideway capital project, Metro Transit must conduct a service equity analysis for the Orange Line six months prior to the beginning of revenue operation.

Additionally, Metro Transit is proposing concurrent service changes to maximize access to the Orange Line; this work is being conducted as part of the METRO Orange Line Connecting Bus Study. The proposed METRO Orange Line and related service changes as part of the METRO Orange Line Connecting Bus Study Recommended Plan meet Metro Transit's "major service change" threshold, as defined in the Metropolitan Council's Title VI Program.¹

Purpose of this Report

The following analysis fulfills FTA Title VI service equity analysis requirements by assessing how the proposed service changes as part of the METRO Orange Line Connecting Bus Study Recommended Plan would impact BIPOC and low-income populations and whether there would be disparate impact on BIPOC populations and/or disproportionate burden on low-income populations.

Metro Transit began the Title VI service equity analysis of the Orange Line and connecting bus service in January 2020. Public engagement and preliminary service equity analysis results shaped multiple iterations of the service plan, culminating in the Recommended Plan analyzed in this report.

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. 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.

1

<https://www.metrotransit.org/Data/Sites/1/media/about/titlevi/2020%20Title%20VI%20Program%20Update.pdf>

Metro Transit

Metro Transit 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 served nearly 78 million bus and rail passengers in 2019 with award-winning, energy-efficient fleets.

METRO Orange Line and the Connecting Bus Study

The METRO Orange Line is a planned highway BRT line scheduled to open in late 2021. It will substantially replace Route 535 with frequent (every 10-15 minutes), all-day service in both directions in the I-35W corridor between downtown Minneapolis and Burnsville. There will be 12 stations in the 17-mile corridor serving Minneapolis, Richfield, Bloomington, and Burnsville as shown in Figure 1.

Orange Line service will have competitive running times for station-to-station trips and offer a new option for reverse-commuters (riders traveling from urban areas to suburban destinations). The project includes street and highway improvements, upgraded transit stations, and improved bus routes. BRT provides high quality, reliable service like LRT but is less expensive to build and allows for a more flexible route. More information on the Orange Line project is available at metrotransit.org/orangeline.

METRO Orange Line Connecting Bus Study

Scope and Purpose

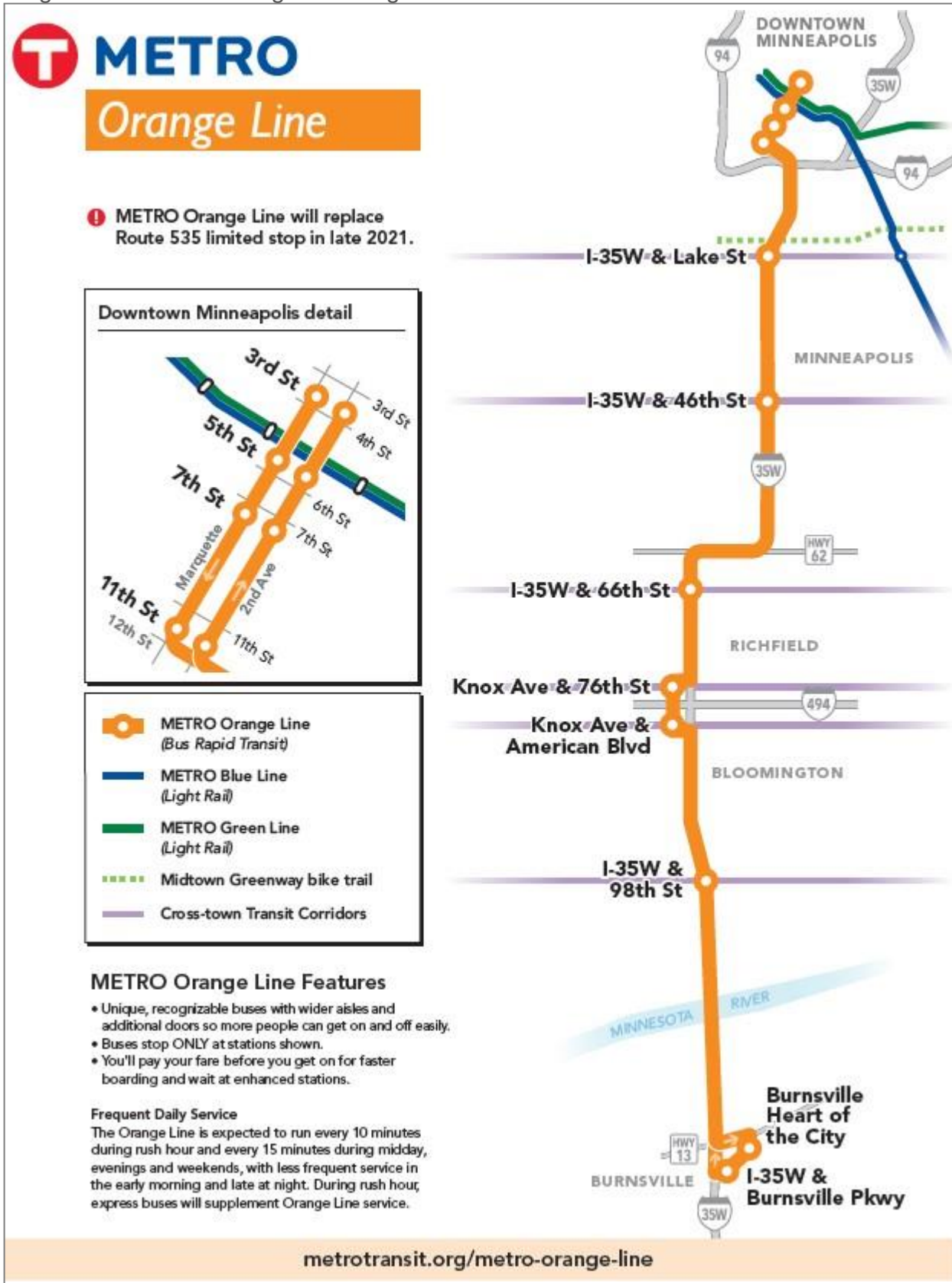
A large share of Orange Line riders are expected to access stations using transit, so an effective network of connecting bus service will be critical for its success. In addition, although the Orange Line will replace most of the Route 535, there are four local branches that will not be covered by the Orange Line that need to be included in the local route network.

The purpose of the METRO Orange Line Connecting Bus Study is to review service in the study area in conjunction with the opening of the Orange Line and recommend service changes to maximize access to the Orange Line. The Orange Line Connecting Bus Study Recommended Plan was built upon on an evaluation of current transit service in the study area conducted in 2019. The preceding Existing Conditions Report determined the market conditions, effectiveness and efficiency of existing transit service and set the foundation for exploring potential new connecting service with the Orange Line, transit market opportunities, and facility needs. The Existing Conditions Report and other project materials are available at metrotransit.org/OLCB.

Study Area

The study area, shown in Figure 2, is bounded by the Mississippi River on the east, I-394 on the north, Highway 169 on the west, and the Minnesota River on the south. The study area is urban in the northern half, including downtown Minneapolis, and covering many neighborhoods in south Minneapolis, and suburban in the southern half, covering Bloomington, Edina, and Richfield. Although the Orange Line extends to Burnsville, the study does not include areas south of the Minnesota River, which is served by a separate transit provider, Minnesota Valley Transit Authority (MVTA).

Figure 1. METRO Orange Line Alignment and Stations



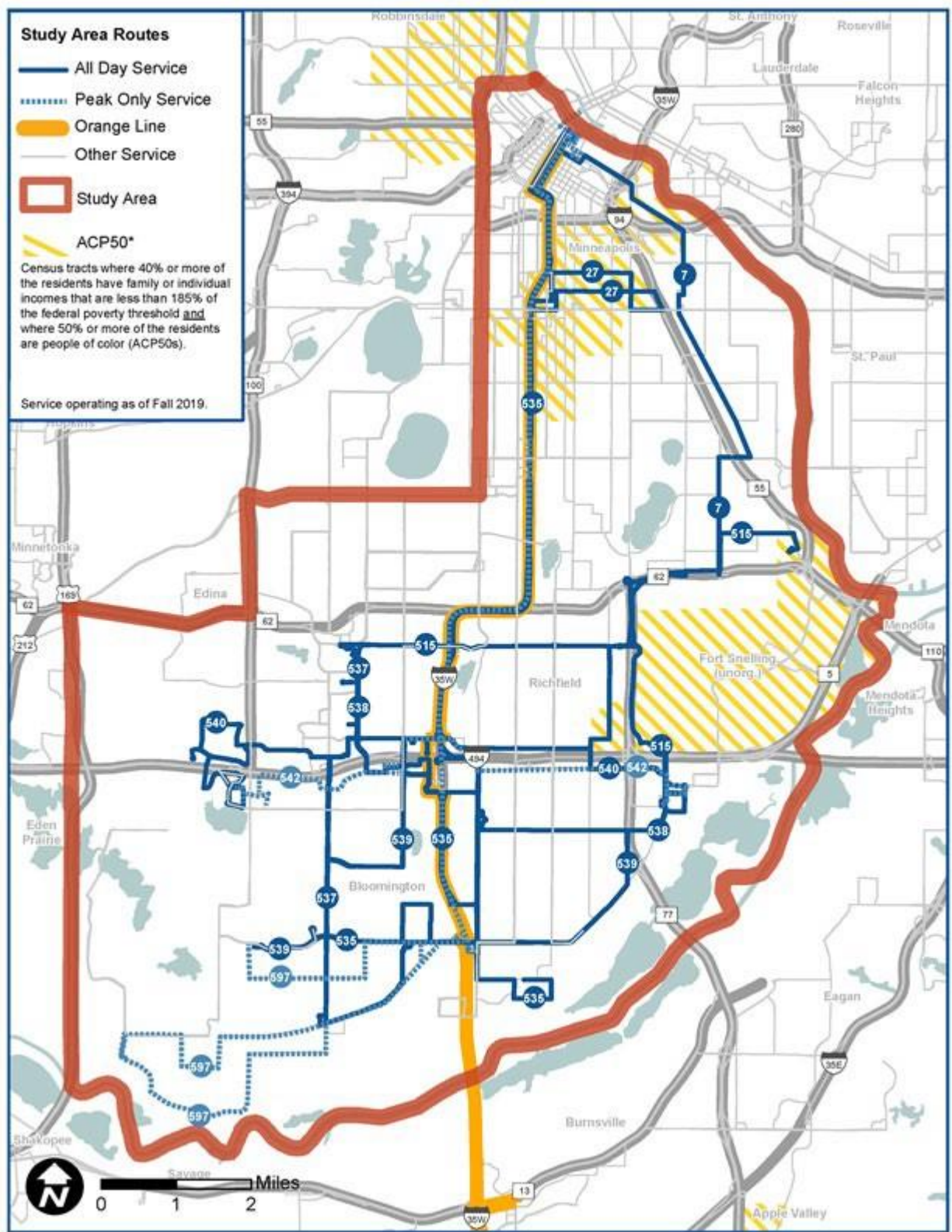


Figure 2. METRO Orange Line Connecting Bus Study: Key Routes in the Study Area

Context

Transit has operated on Nicollet Avenue and other main thoroughfares in south Minneapolis since the late 1800s. After World War II, with downtown Minneapolis still the major focus of employment in the metro, service on the primary north-south bus routes were extended further south to accommodate residential development in Richfield, Bloomington, and Edina. Express service to downtown Minneapolis on I-35W was added starting in the late 1970s.

Employment patterns have shifted dramatically. While downtown Minneapolis is still a major regional employment node, many of the region's jobs are located at dispersed car-oriented suburban employment nodes with free parking and poor pedestrian infrastructure. Within the past decade, more emphasis has been placed on creating suburban nodes that integrate residential and employment development together in a pedestrian and transit friendly environment. The Penn- American development, which is located near I-494 and I-35W in Bloomington near the Orange Line's American Blvd. Station is a good example of this type of transit-oriented development.

Project Goals

Goals of the Orange Line Connecting Bus Study include:

- Link significant concentrations of residents, jobs, and services with the Orange Line
- Retain existing customers, grow ridership. Prioritize service for communities of color, people experiencing poverty and those who rely on transit the most
- Simplify the route network by emphasizing directness and avoiding branches
- Enhance mobility and connectivity of the transit network
- Complement existing commuter and express service in the corridor

Planning considerations

The proposed service changes included as part of the Orange Line Connecting Bus Study Recommended Plan are designed to meet the goals outlined above. Productivity, social equity, and connectivity were considered when reviewing and prioritizing specific service changes and the investment of limited resources. These factors are supported by the direction laid out by the Metropolitan Council in Thrive MSP 2040 and the 2040 Transportation Policy Plan (TPP).

- Improved route structure and network
 - More direct, simpler service with fewer variations
 - Schedule reliability and network efficiency
 - Faster off-peak travel time between downtown, south Minneapolis, and the south suburbs, particularly Bloomington
- Service performance
 - Meet regional standards for service productivity (passengers per in-service hour)
 - Grow ridership by attracting new and retaining existing riders, encourage transfer rides
- Equity and market considerations
 - Residential concentrations of, and destinations visited by, low-income persons, communities of color, and persons with disabilities

- Geographies with lower auto availability rates as measured by the number of vehicles registered in an area compared to those old enough to drive
- Population and employment density data, especially access to lower wage jobs paying less than \$40,000 a year

Public Outreach and Engagement

Public outreach and engagement were done in fall 2019 to inform the creation of the Concept Plan. The results of this engagement were also compared to the findings of Metro Transit’s Listening and Learning Through Crisis outreach in summer 2020, from which staff determined that this project’s 2019 engagement work remained valid. Another round of engagement occurred in winter and spring 2021 to collect feedback on the published Concept Plan, which included draft service equity analysis results. The Recommended Plan – analyzed here – was created in response to the results of these public outreach and engagement efforts as well as the preliminary results of the service equity analysis. Full documentation of the public outreach and engagement efforts completed as part of the study are available at metrotransit.org/OLCB.

A Note on COVID-19 and Impacts on the Planning Process

While the long-term ridership impacts of the COVID-19 pandemic are not known, the short-term impacts have been significant. The Recommended Plan is based on a mix of current ridership patterns and those that existed before the crisis, which may change in the long-term as people adapt and new travel needs emerge. To the extent possible given the information available, the Recommended Plan has considered potential long-term impacts to ridership and travel behavior in response to the crisis. However, the plan may need to be adjusted and the timeline for implementing certain changes may need to be modified later in the planning process based on market conditions at the time the Orange Line opens.

Proposed Service Changes

The proposed service changes analyzed in this report are hereafter collectively referred to as the Orange Line Connecting Bus Study Recommended Plan (Recommended Plan). The complete Recommended Plan report with additional details is available at metrotransit.org/OLCB.

METRO Orange Line

The Orange Line (Figure 1) will provide daily, high frequency service from about 5 AM to midnight, replacing much of existing Route 535. All I-35W express routes and many local routes will provide connections at Orange Line stations outside downtown Minneapolis. The estimated 2021 operating statistics for the Orange Line are summarized in Table 1. The Orange Line will offer weekend service, which is not available on Route 535 today.

Table 1: Orange Line Estimated Statistics - 2021

Service Day	Revenue Hours	Revenue Trips	Peak Buses	Off-Peak Buses	Peak Frequency	Midday Frequency	First Trip	Last Trip
Weekday	115.5	154	10	6	10 min.	15 min.	5:00 AM	12:00 AM
Saturday	96.9	134	6	6	15 min.	15 min.	5:00 AM	12:00 AM
Sunday	96.9	134	6	6	15 min.	15 min.	5:00 AM	12:00 AM

Recommended Plan

In addition to the METRO Orange Line, the Recommended Plan proposes route and service changes on about a dozen routes and the introduction of several new routes to be implemented when the Orange Line opens in late 2021. Figure 3 shows the proposed structure of all the existing, restructured, and new routes in the study area.

There are many existing routes within the project study area: Routes 4, 6, 7, 11, 18, 21, 27, 46, 53*,

146*, 156*, 515, 535, 537*, 538, 539, 540, 542*, 552*, 553, 554*, 558*, 578, 579*, and 597.

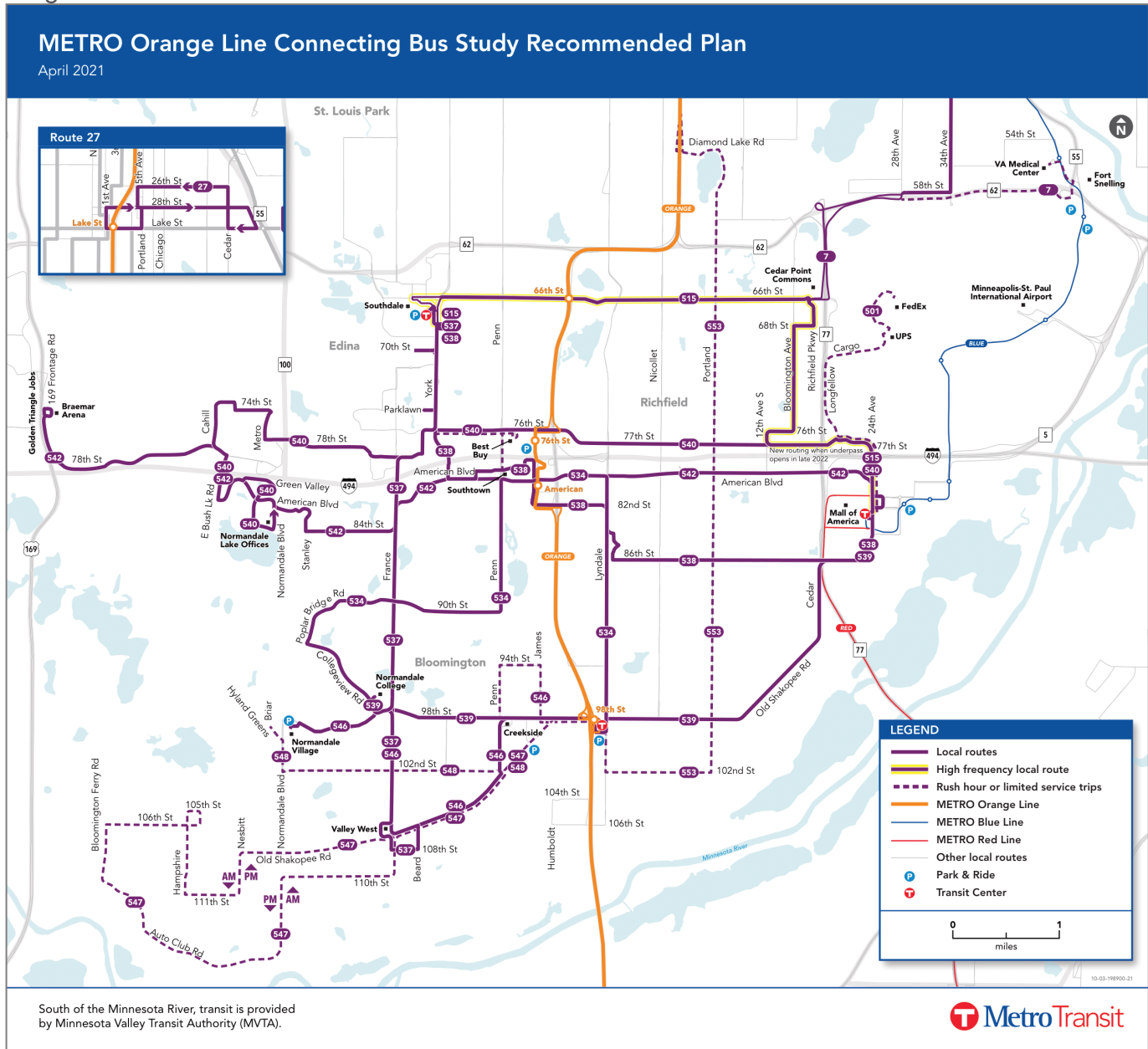
Routes

noted with an asterisk (*) have been suspended since March 2020 due to the COVID-19 pandemic. Of these existing study area routes:

- 21 routes already serve a future Orange Line station south of downtown Minneapolis: Routes 4, 11, 18, 21, 27, 46, 53*, 146*, 156*, 515, 538, 539, 540, 542*, 552*, 553, 554*, 558*, 578, 579*, and 597.
- No changes are recommended on 13 routes in the study area: Routes 4, 6, 11, 18, 21, 46, 53*, 156*, 552*, 554*, 558*, 578, and 579*. However, among these routes, those that were operating in Fall 2020 are included in the service equity analysis to account for existing and proposed service from routes parallel or connecting to, or complementary of, the Orange Line.
- Changes to route structure, frequency, or span of service are proposed on 11 routes: Routes 7, 27, 515, 535, 537*, 538, 539, 540, 542*, 553 and 597.
- Five new routes are recommended for implementation: Routes 501, 534, 546, 547, 548

For complete information regarding existing transit service and markets in the Orange Line Corridor Study Area, please refer to the Orange Line Connecting Bus Study Existing Conditions Report available at metrotransit.org/OLCB.

Figure 3. Recommended Plan



Proposed Changes on Existing Routes

Route 7: All remaining trips will be extended from 34th Ave. S. to Cedar Point Commons Shopping Center on 66th St. at Cedar Ave. in Richfield seven days a week. Route 7 will partially replace Route 515E between VA Medical Center and the 66th St. corridor. Selected weekday trips, mostly northbound morning, and southbound afternoon in the peak periods, will serve VA Medical Center for a direct link with Route 515. Route 7 will continue to run every 30 minutes on weekdays and weekends.

Route 27: All trips will be extended to directly serve the I-35W & Lake St Station, providing a connection with the Orange Line and other I-35W express routes. This link will re-establish access to large employers such as Abbott Northwestern Hospital, Allina, Children’s Hospital and Wells Fargo Home Mortgage. The route will run every 30 minutes on weekdays during the midday and rush hour.

Route 515: This route has a critical role serving the Orange Line at 66th St. Station. The route will be simplified from three variations to one with no branches. The routing will change in Richfield, modified to travel via 66th St., Richfield Pkwy., 68th St., Bloomington Ave., 76th St., 12th Ave. in 2021. Then, once the 77th St. underpass at Hwy. 77 opens in late 2022, the route will be via E. 77th St. and 24th Ave. S. to Mall of America. “High Frequency” service every 15 minutes Monday thru Saturday will be restored, while remaining every 20 minutes on Sunday.

Areas of Route 515 planned for elimination and alternatives

- Service will be eliminated on Longfellow Ave. between 66th and 77th streets. This will affect about nine rides per day, with most commuters likely walking from Longfellow Ave. to the Fed Ex and UPS air cargo facilities at MSP Airport. Rides to Fed Ex and UPS are higher than rides returning, likely because bus commuters are carpooling with co-workers when leaving work due to variable actual work end times. New Route 501 Mall of America – Cargo Rd. will effectively replace the existing route with direct weeknight service timed for the air cargo facilities’ work shifts.
- Service on Route 515 will also be eliminated in the Nokomis neighborhood between 28th Ave./Hwy. 62 and VA Medical Center on 58th St., 34th Ave., and 54th St. About 80 weekday and 30 Saturday rides are affected. Alternate service is available two blocks away on Route 22, and Route 7, with the extension between this area and Cedar Point Commons will make connections with Route 515 for service along 66th St. Weekday service to and from VA Medical Center will be provided by a new branch of Route 7 at selected, mainly peak times, operating non-stop between VA Medical Center and Cedar Point Commons at 66th St. and Cedar Ave. for connections with Route 515.
- Finally, Route 515 will not operate on 12th Ave. and American Blvd. south of 77th St. once the 77th St Underpass opens at Hwy. 77. Routes 5 and 542 will continue to serve this area on American Blvd.

Route 535: The route will be largely replaced by the Orange Line at stations in Minneapolis, Richfield, and Bloomington. The local branches of Route 535 will be replaced by new service proposed as follows:

- B branch will be covered by Route 534 on American Blvd., Route 540 on 76th St., and Route 534 on Lyndale Ave.
- C branch will be covered by Route 534 on American Blvd., Route 540 on 76th St, Route 546 on James Ave., 94th St. and Penn Ave., and Route 539 on 98th St.
- D branch will be served by Route 534 on American Blvd., Route 540 on 76th St., Route 534 on Lyndale Ave., and Route 539 on 98th St.

E branch on Lyndale Ave will be served by Route 534 and on 102nd St. by Route

553. There will be no service in the area south of 102nd St.

Route 537: This route is currently suspended due to the pandemic, but will be restored effective August 21, 2021 with the beginning of the Normandale Community College fall semester. Service will be the same as it was before being suspended due to the COVID-19 pandemic.

Route 538: No routing changes are planned, but frequency will improve to every 30 minutes during the midday.

Route 539: This route will connect Normandale Community College, 98th St. and E. Old Shakopee Rd. with the Orange Line at 98th St. Station. It will be simplified so that all trips follow the same routing via 98th St. between the Orange Line station and Normandale Community College. The route will replace most of existing Route 535 west of I-35W, providing a direct link for the benefit of about 200 one-way rides during the main school year. Service will operate every 20 minutes during the AM Peak, every 30 minutes in the midday, the PM Peak, on Saturdays, and every 60 minutes during the evenings and on Sundays.

Areas of Route 539 planned for elimination and replacement service

- Route 4 will serve Penn Ave. north of American Blvd.
- Route 534 will serve 90th St. between France and Penn avenues, Penn Ave to Southtown.
- Route 540 will serve 76th St. between Penn Ave. and Knox Ave.
- Route 546 will serve Penn Ave. south of 98th St., Old Shakopee Rd., Valley West Center, France Ave., and W. 98th St., Normandale Community College, Normandale Village. Routes 539 and 546 will connect at 98th St. Station.

Route 540: This route has a critical role serving Knox Ave. & 76th St. Station. The route will be simplified so all trips follow the same alignment. In Richfield, service will use the new 77th St. underpass to serve 24th Ave. S. and Mall of America. Service will be eliminated on American Blvd. when the underpass opens in late 2022; alternate service is via routes 5 or 542. Service will operate every 20 minutes in peak hours, every 30 minutes in the midday, Saturdays, and every 30 and 60 minutes in the evenings and on Sundays.

Areas of Route 540 planned for elimination and replacement service

- Service is planned to be eliminated on American Blvd. Alternate service is available on routes 5 and 542. This change affects about 80 weekday, 50 Saturday, and 35 Sunday rides.
- Route 540 is also planned to be eliminated on 78th St. and Picture Dr. between Edina Industrial Blvd. and E. Bush Lake Rd. This will affect fewer than 10 riders, who will have to walk about 2,000 feet through a parking lot to Edina Industrial Blvd. Limited service will remain in this area on Route 6.

Route 542: This route is currently suspended due to the pandemic but will be restored. The route will cover areas south of I-494 to provide a connection with American Blvd. Station via

American Blvd., France, 84th St, Stanley, and 82nd St. Service will be extended west via American Blvd., E. Bush Lake Rd., 78th St. to Braemar Arena in Edina, providing new access to employers located west of E. Bush Lake Rd. Service will now run every 30 minutes during the midday, every 30 and 60 minutes in the evening on weekdays only. SW Prime on-demand service will offer connections between Route 542, Golden Triangle and other places in Eden Prairie, Chaska, and Chanhassen upon request.

Areas of Route 542 planned for elimination

- Route 542 will no longer serve the A branch on American Blvd. between France Ave. and 82nd St. There were about 2-3 riders in this segment, most within walking distance to either 82nd St. or France Ave.

Route 553: The route will be extended south of 98th St. to replace existing Route 535E branch, connecting 98th St. Station with Lyndale Ave. and 102nd St. to Portland Ave. The service will consist of two trips during each peak period on weekdays.

Route 597: This commuter express route has been curtailed by the COVID-19 pandemic, and now will be replaced by routes 547, 548 and the Orange Line. Timed transfers will be scheduled at 98th St. Station. Route 539 will replace service on W. 98th St. There will be no alternate service on the half mile of Xerxes Ave. S. between 102nd and 98th streets. Travel time between 98th St. Station and downtown Minneapolis will be about four minutes longer on the Orange Line as compared to Route 597. Timed transfers of about five minutes between routes 547, 548, and the Orange Line will ensure very reliable connections.

Proposed New Routes

Route 501: This new route will connect Mall of America Transit Station with air cargo companies such as FedEx and UPS located on Cargo Rd. near the airport for weeknight shifts, effectively replacing the Route 515B branch. The route will follow Cargo Rd. to better serve Fed Ex and UPS, saving riders a one-mile walk from Longfellow Ave.

Route 534: This new route will connect with the Orange Line at both 98th St. Station and American Blvd. Station every day. It will serve Lyndale Ave., American Blvd., Penn Ave, 90th St., Poplar Bridge Rd., Collegeview Rd., and Normandale Community College. It will replace part of current Route 539. Service will run every 30 minutes peak periods, and in the midday. Weekend and evening service will run every 60 minutes.

Route 546: This new route will connect with the Orange Line at 98th St. Station every day. It will serve 98th St., Penn Ave., Old Shakopee Rd., Valley West Center, France Ave., Normandale Community College, and Normandale Village. It will replace part of current Route 539. Creekside Community Center will be served via new bus stops on Penn Ave. Rush-hour trips will divert to serve employers on James Ave. and 94th St. Service will operate every 30 minutes during the peaks and midday, every 60 minutes during the evenings and weekends.

Route 547: This route will provide a connection at 98th St. Station for access to southwest

Bloomington employers on Old Shakopee Rd. It will also transport residents from Auto Club Rd., Normandale Blvd., and 110th St. to 98th St. Station for connections with the Orange Line as a replacement for express Route 597. New Route 547 will run every 30 minutes during the peak periods.

Route 548: This local route will replace Route 597B branch, connecting residents along 102nd St. with 98th St. Station. The route will be streamlined via Hyland Greens Dr., Normandale Blvd., W. 102nd St. and Old Shakopee Rd. New Route 548 will run every 30 minutes during peak periods.

Previous Service Changes

The public health response to the COVID-19 pandemic has led to steep reductions in public transit service and ridership across the United States. Metro Transit implemented significant changes to service in March 2020 and June 2020 to support efforts to slow the spread of COVID-19 while serving

those who must make essential trips and who have no other options than to take transit. Service changes implemented in September 2020 (“Fall 2020”) focused resources in areas where they are most needed to provide critical travel during this ongoing crisis. However, Fall 2020 service levels remained below those prior to the COVID-19 pandemic.

As discussed on the previous pages, study area Routes 53, 146, 156, 537, 542, 552, 554, 558, and 579 have been suspended since March 2020 due to the decline in ridership and disruption of transit needs and resources resulting from the COVID-19 pandemic. Moreover, study area commuter Routes 553, 578, 597 continued to operate but at very limited levels – one or two trips per peak period.

Other than routes 537, 542 and 597, the Recommended Plan is silent on the future of routes that are currently suspended. The future of suspended routes throughout the region will be determined through a separate public process.

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.”²

Moreover, FTA guidance recognizes the inherent overlap between Title VI and environmental justice principles, which extend protections to low-income populations. In 1994, President Clinton issued Executive Order 12898 - Federal Actions to Address Environmental Justice in BIPOC Populations and Low-Income Populations, 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 BIPOC 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 BIPOC communities and low-income communities from being subject to disproportionately high and adverse environmental effects.”³

To provide direction to recipients of federal funding, FTA issued Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients in 2012.⁴ 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.

Title VI Definitions of BIPOC and Low-Income Populations

BIPOC

FTA defines a “BIPOC” 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. However, as part of efforts to use respectful and inclusive language, **Metro Transit and the Metropolitan Council prefer to use the term Black, Indigenous, and People of Color (BIPOC) rather than “BIPOC” when referring to people who identify as one or more of the above racial or ethnic groups.** As such, references to BIPOC residents in this report should be interpreted to mean the same thing as “BIPOC” residents.

For the purposes of this evaluation, “non-BIPOC” persons are defined as those who self-identify as non-Hispanic white. All other persons, including those identifying as two or more races and/or ethnicities, were defined as BIPOC.

² <https://www.govinfo.gov/content/pkg/USCODE-2010-title42/pdf/USCODE-2010-title42-chap21-subchapV.pdf>
Title VI Service Policy Changes - Metro Transit

³ <https://www.archives.gov/files/federal-register/executive-orders/pdf/12898.pdf>

⁴ https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf

Low-Income

While low-income populations are not an explicitly protected class under Title VI, FTA recognizes the inherent overlap between Title VI and environmental justice principles. Consequently, it 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.

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 family/household size. 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 Title VI service equity analysis uses 2018 U.S. Census Bureau poverty thresholds, a more sophisticated measure of poverty that considers not only family/household size, but also the number of related children present, and, 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.⁵ The U.S. Census Bureau 2018 poverty thresholds by family size and presence of related children under 18 years is shown in Table 2.

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)	12,784									
Under 65 Years	13,064	13,064								
65 Years & Over	12,043	12,043								
Two People	16,247									
Householder Under 65 Years	16,889	16,815	17,308							
Householder 65 Years & Over	15,193	15,178	17,242							
Three People	19,985	19,642	20,212	20,231						
Four People	25,701	25,900	26,324	25,465	25,554					
Five People	30,459	31,234	31,689	30,718	29,967	29,509				
Six People	34,533	35,925	36,068	35,324	34,612	33,553	32,925			
Seven People	39,194	41,336	41,594	40,705	40,085	38,929	37,581	36,102		
Eight People	43,602	46,231	46,640	45,800	45,064	44,021	42,696	41,317	40,967	
Nine People or More	51,393	55,613	55,883	55,140	54,516	53,491	52,082	50,807	50,491	48,546

Table 2. U.S. Census Bureau Poverty Thresholds (in Dollars) for 2018

Source: <https://www.census.gov/library/publications/2019/demo/p60-266.html>.

⁵ The distinctions between poverty thresholds and guidelines are described further at: Title VI Service Equity Analysis Metro Transit

Disparate Impact, Disproportionate Burden, and the Four-Fifths Threshold

In Circular 4702.1B, FTA defines **disparate impact** as:

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.

Similarly, FTA defines **disproportionate burden** as:

a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations.

Per FTA guidance, Metro Transit uses its **disparate impact and disproportionate burden thresholds** as evidence of impacts severe enough to meet the definition of disparate impact or disproportionate burden.

Metro Transit has defined its disparate impact and disproportionate burden policies and thresholds using the “four-fifths rule,” which states that there may be evidence of disparate impacts/disproportionate burden if:

- Benefits are being provided to [BIPOC] (or low-income) populations at a rate less than 80% (four-fifths) of the benefits being provided to [non-Hispanic white] (or non-low-income) populations, or
- Adverse effects are being borne by [non-Hispanic white] (or non-low-income) populations at a rate less than 80% (four-fifths) of the adverse effects being borne by [BIPOC] (or 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.⁶ The four-fifths rule suggests that a selection rate for any racial, ethnic, or gender group that is less than four-fifths or 80% 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 for its disparate impact and disproportionate burden thresholds was subject to a formal public outreach process before being adopted by the Metropolitan Council in 2013.

If a potential disparate impact for BIPOC (BIPOC) 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 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.

⁶ Section 60-3.4, Uniform Guidelines on Employee Selection Procedure (1978); 43 FR 38295 (August 25, 1978). Available at: https://www.ecfr.gov/cgi-bin/text-idx?SID=32bc9e63d4010fdc925255ce127a7a0f&mc=true&node=pt41.1.60_63&rgn=div5#se41.1.60_63_118

Policies Applied to This Study

In this analysis, if the quantitative results indicate that the increase in service to BIPOC/low-income populations is less than 80% of the increase in service levels to non-Hispanic white/non-low-income populations, this could be evidence of disparate impact/disproportionate burden. In this event, additional analysis would be conducted, and potential mitigation measures would be identified.

Analysis Methodology

Impacts of the proposed service changes on residents of the study area are determined based on the change in access to transit as a result of the Recommended Plan. Access to transit is measured as the number of weekly scheduled bus trips available to a given population. The “current” service levels are representative of Fall 2020, while proposed service levels are those outlined in the Recommended Plan.

A geographic information systems (GIS)-based approach was used in this analysis to measure the location and magnitude of service changes and compare the change in access to transit for BIPOC, non-Hispanic white, low-income, and non-low-income populations based on where they live. The analysis consists of five steps:

1. Model current and proposed service levels (scheduled weekly bus or train trips).
2. Allocate current and proposed transit service levels to population groups based on intersection between service buffer (e.g., quarter mile from a bus stop) and census block.
3. Calculate the percent change in service between the current and proposed service levels for each census block.
4. Calculate the weighted average percent change in service for all BIPOC (or low-income) and non-Hispanic white (or non-low-income) populations within the Title VI service area for the current and proposed transit service.
5. Determine whether the proposed service will result in disparate impacts or disproportionate burdens by applying Metro Transit’s disparate impact and disproportionate burden policies.

This analysis used the number of scheduled trips available to each census block as a measure of access to transit, or 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 scheduled 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.

1. Modeling Current and Proposed Service Levels

A transit network was modeled to represent the proposed service levels of the Recommended Plan. This analysis measured service at the stop/station level within the study area boundaries from study area routes (Table 3). Measuring transit service at the stop/station level assigns service only to areas near where a transit vehicle may pick up and drop off passengers, disregarding non-stop route segments. The Recommended Plan service levels were compared against “current” service levels, representative of Fall 2020.

Study area routes included as part of the two modeled transit networks are listed in Table 3.

Table 3. Study Area Routes Included in Analysis by Modeled Transit Network

Study Area Route	Current (Fall 2020)	Recommended Plan	Comment
4	x	x	Parallel/connects to corridor
7	x	x	Restructured
11	x	x	Parallel/connects to corridor
18	x	x	Parallel/connects to corridor
21	x	x	Connects to corridor
22*	x	x	Serves area where Route 515E would be eliminated
27	x	x	Extended west for connection
46	x	x	Connects to corridor
501		x	New route
515	x	x	Restructured, simplified
534		x	New route
535	x		Replaced by Orange Line
537		x	Currently suspended due to COVID-19; restored in Recommended Plan
538	x	x	Frequency improvements
539	x	x	Restructured, simplified
540	x	x	Restructured, simplified
542		x	Currently suspended due to COVID-19; restructured and restored in Recommended

			Plan
546		x	New route
547		x	New route
548		x	New route
553	x	x	Restructured
578	x	x	Parallel/connects to corridor
597	x		Replaced by Orange Line, new Routes 547 and 548
Orange		x	New route

*Route 22 service was included east of 28th Ave S near the VA Medical Center. The other route serving this area around the VA Medical Center today is Route 515E, which would be replaced with a new branch of Route 7 under the Recommended Plan. Including Route 22 in the analysis appropriately accounts for the service that would remain under the Recommended Plan.

2. Assigning Transit Trips to Census Blocks and Population

The number of weekly scheduled bus trips at each stop or station was assigned 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 the centroid of the census block was within a quarter mile of the stop, and it was considered served by a rail or BRT station if it was within a half mile of the station.

Metro Transit uses the quarter mile and half mile distances as the standard maximum walk/roll distance assumed for access local bus and transitway (e.g., LRT, BRT) service, respectively.

Demographic Data

Transit service data is combined with population data from the U.S. Census Bureau to determine and compare the distribution of impacts and benefits – that is, average percent change in transit service – to BIPOC, non-Hispanic white, low-income, and non-low-income populations based on where they live.

Demographic information is available at the census block level from the 2010 U.S. Census Bureau Decennial Census. However, the most recent demographic dataset at the beginning of analysis published by the U.S. Census Bureau, the 2014-2018 American Community Survey (ACS) 5-year Estimates, is available only at the census block group level. The 2014-2018 ACS dataset contains estimates that are based on the most recent five years of data collected by the U.S. Census Bureau (2014 through 2018).⁷

Census block groups and blocks differ in their size and availability. 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. The larger census block group is typically made up of a cluster of approximately 40 census blocks. Due to their larger size, it can be difficult to identify location-specific impacts using only block group data.

To provide more granularity and detail to the analysis, BIPOC, non-Hispanic white, low-income, and non-low-income populations were estimated at the smaller census block level using a combination of 2014-2018 ACS data and 2010 Decennial Census data and data interpolation techniques.^{8, 9} Due to census data availability issues, and because the boundaries of individual census blocks and block groups do not change between decennial censuses, the following assumptions were used:

- Estimating BIPOC populations and low-income populations for census blocks: For each census block group we assume the percent change in number of BIPOC/low-income residents observed between the 2010 Decennial Census and the 2014-2018 ACS estimate (e.g., 5% increase) is applicable to all blocks nested within their parent block group.
- Estimating low-income populations for census blocks: We assume the relationship between block group total population and nested block total population remains constant over time. For example, if the 2010 data showed that a block contained 5% of the total population within

⁷ As a collection of estimates, the 2014-2018 ACS data are subject to error, but remain the most reliable and current demographic data readily available for the service area.

⁸ The Decennial Census reports race and ethnicity data at the block and block group levels. To calculate the number of BIPOC residents living in a census block, we assume that, for each census block group, the percent change in number of BIPOC residents observed at the block group level between the 2010 Decennial Census and the 2014-2018 ACS estimate (e.g., 5% increase) is applicable to all blocks nested within their parent block group. This block group ratio of change in the number of BIPOC residents between the two periods is multiplied by the number of BIPOC residents observed in 2010 Decennial Census from each nested block to arrive at a 2014-2018 ACS estimate of BIPOC residents within census blocks.

⁹ Information on low-income individuals is not available from the Decennial Census, requiring additional assumptions. To calculate the number of low-income people at the block level incorporating the latest 2014-2018 ACS data, we first assume that the relationship between block group total population and nested block total population remains constant over time. For example, if the 2010 data showed that a block contained 3% of the total population within its parent block group, it was assumed that this block contains 3% of the total populations estimated in the 2014-2018 ACS data for that same parent block group. Additionally, we assume the percentage of low-income populations within a block group is applicable to all blocks nested within their parent block group. For example, if 20% of block group residents are low-income, we assume that 20% of block residents within that same block group are also low-income.

its parent block group, it was assumed that this block contains 5% of the total populations estimated in the 2014-2018 ACS data.

While this approach relies on significant assumptions, it allows for a more precise analysis than using the block groups. Importantly, this approach also allows for the identification of zero-population areas within each block group and incorporates more recently published data to partially reflect changes in population over time.

3. Calculating Change in Service by Census Block

The absolute change in service level was calculated for each census block in the Title VI service area by subtracting the current number of weekly scheduled trips available from the proposed number of weekly scheduled trips available. 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 current number of weekly scheduled trips. To minimize artificial skewing, all percent changes greater than 100% (positive or negative), including those that are incalculable due to no current or proposed service, were adjusted to a maximum absolute value of 100%.

4. 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 living in that census block. For example, the average percent change in service for BIPOC populations was completed by multiplying each census block’s BIPOC population by the percent change in service for that block, summing the results for all blocks in the Title VI service area, and dividing that sum by the total BIPOC population for all blocks in the Title VI service area. The formula used for these analyses is shown in Figure 4.

In this manner, the weighted percent change was calculated individually for the total population, BIPOC population, non-Hispanic white 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.

Figure 4. Formula for Population-Weighted Average Percent Change in Service

$$\frac{\sum_{i=1}^n (P_i \times (T_{i,prop} - T_{i,cur}))}{\sum_{i=1}^n P_i} = \frac{\sum_{i=1}^n (P_i \times \Delta T_i)}{\sum_{i=1}^n P_i}$$

Where:

PPPPPPPPPPPP CChaaPPaaPP iiPP SSPPSSiiPPPP_{ii} = Percent change in total weekly scheduled bus trips for census block i

PPPPPPPPPPPPPPPP TTPPiPPPP_{ii} = Total proposed weekly scheduled bus trips (modified/planned bus routes) serving census block i

CCCCPPPPPPPPPP TTPPiPPPP_{ii} = Total current weekly scheduled bus trips (existing bus routes) serving census block i

Avg % Δ = Population-weighted average percent change in weekly scheduled bus trips for target population

PPPPPPCCPPaaPPiiPPPP_{ii} = Target population of census block i.

Evaluation of Impacts

Analysis Population

Figure 5 and Figure 6, respectively, show the distribution of BIPOC residents and low-income residents by census block within the Title VI service area. In each map, one dot represents 50 people, and the color of each dot indicates whether it represents BIPOC or non-Hispanic white, or low-income or non-low-income people. Dots are distributed randomly within each census block.

Generally, population density is greater in the northern half of the study area (Minneapolis) compared to the southern (Bloomington, Edina, and Richfield). In addition to having more people, a greater proportion of the population are BIPOC or low-income residents in the northern half of the study area compared to the southern half of the study area (Figure 5, Figure 6). However, there are several exceptions to this pattern, with some neighborhoods and corridors in the southern half of the study area home to relatively higher concentrations of BIPOC and/or low-income residents, too.

Service Level Change by Census Block

The percent change in access to transit – as measured by weekly scheduled bus trips – for residents of census blocks between Fall 2020 and the Recommended Plan are shown in Figure 7. Similarly, Figure 8 displays the absolute change in weekly scheduled bus trips available to residents of census blocks between Fall 2020 and the Recommended Plan. Areas with no population are excluded from both figures.

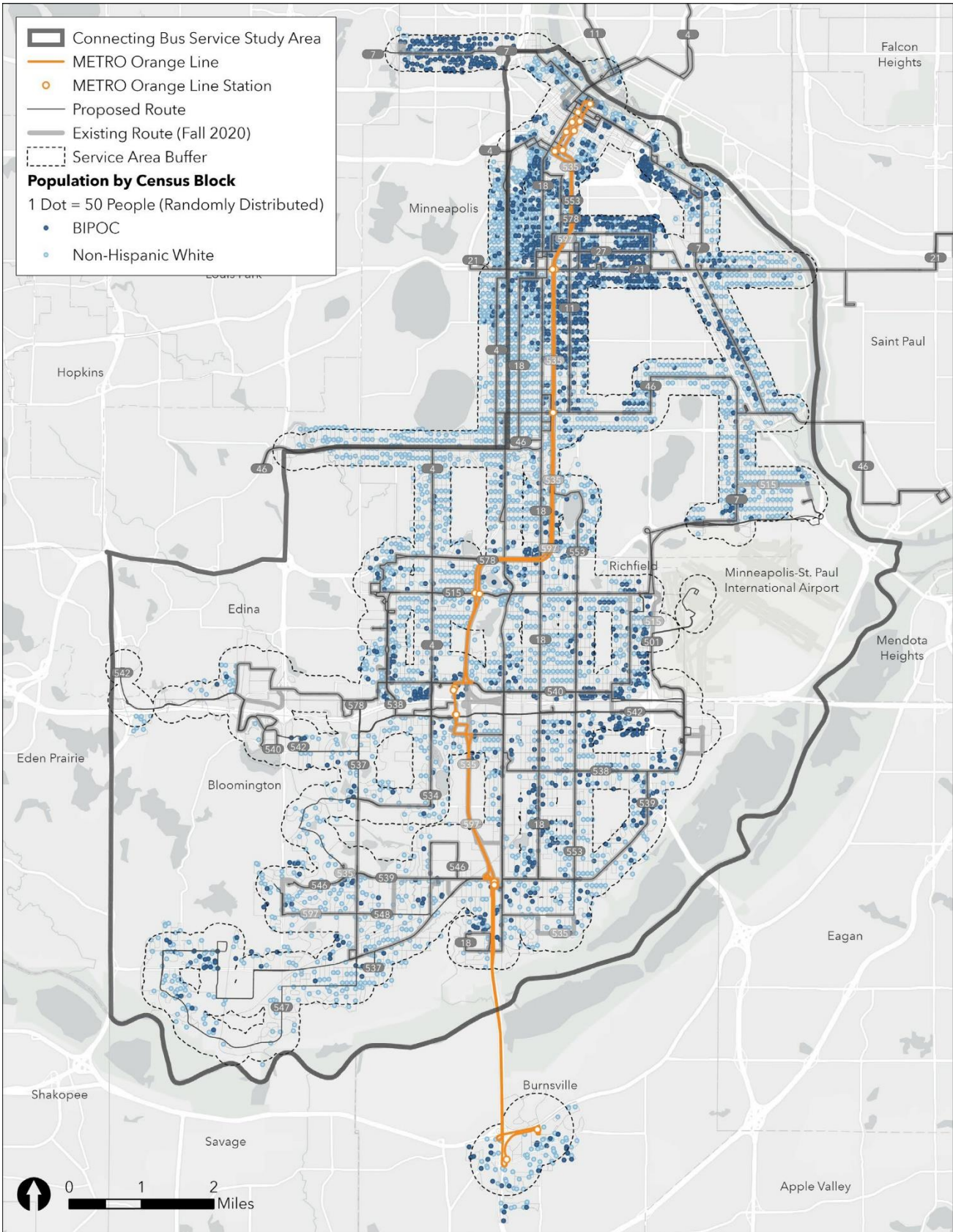


Figure 5. BIPOC Population within the Title VI Service Area
 Source: U.S. Census Bureau 2010 Decennial Census; 2014-2018 American Community Survey 5-Year Estimates, Table B03002; Metro Transit and Metropolitan Council.

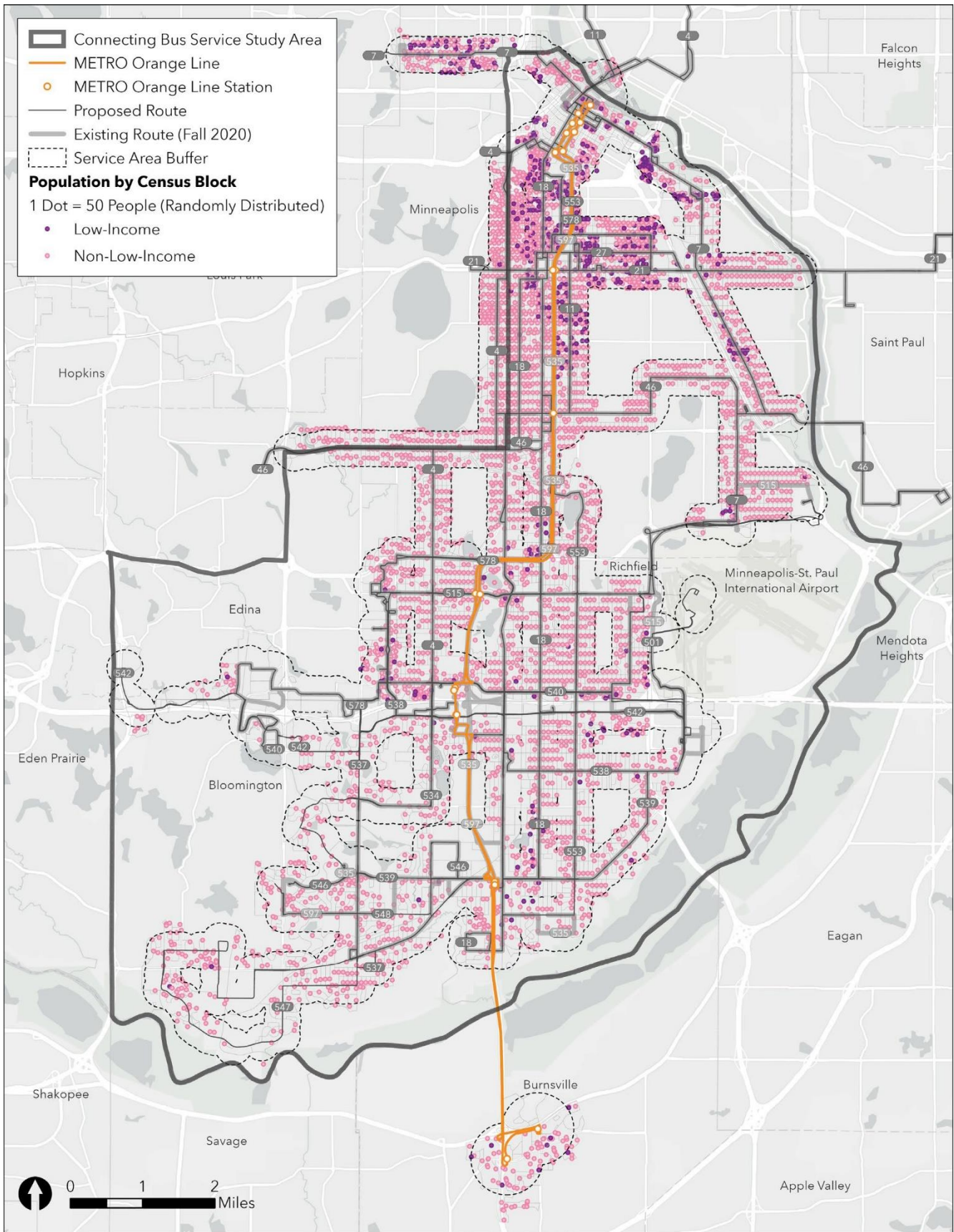


Figure 6. Low-Income Population within the Title VI Service Area

Source: U.S. Census Bureau 2010 Decennial Census; 2014-2018 American Community Survey 5-Year Estimates, Table C17002; Metro Transit and Metropolitan Council.

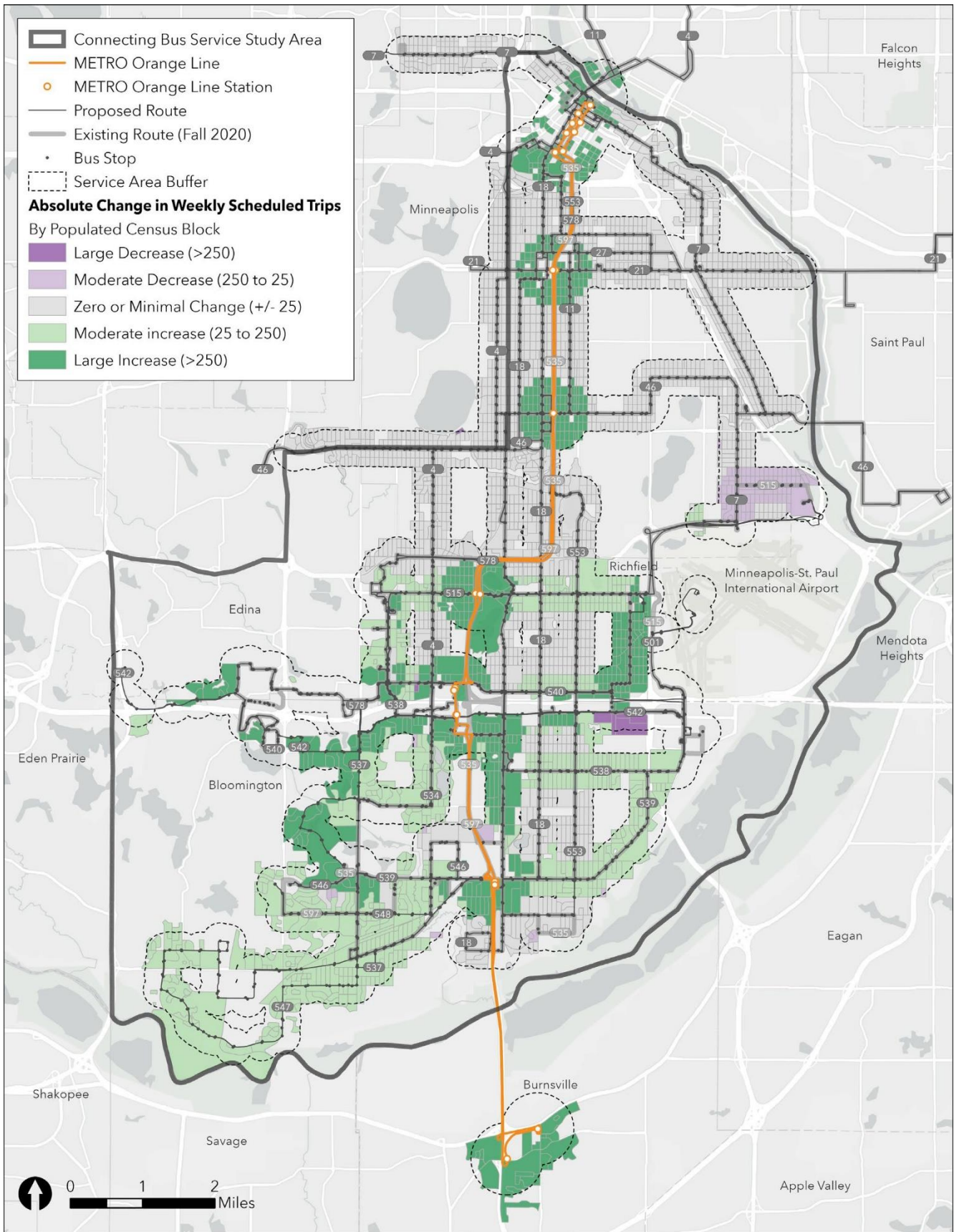


Figure 8. Absolute Change in Service Levels by Census Block: Recommended Plan Compared to Fall 2020

Source: Metro Transit and Metropolitan Council.

Average Percent Change in Service by Population Group

The Title VI implications of the proposed service changes are assessed by calculating a comparison index between the results for the average BIPOC resident and those of the average non-Hispanic white resident, and between the results for the average low-income resident and those of the average non-low-income resident. The comparison index is measured as the ratio between the BIPOC results and the non-Hispanic white results; the same process applies for low-income results relative to non-low-income results. **A comparison index less than 0.80 (four-fifths) indicates the potential for disparate impact/disproportionate burden, per Metro Transit’s disparate impact and disproportionate burden policies.**

Table 4 includes the average percent change in service levels (weekly scheduled bus trips) for each target population group under the Recommended Plan. Compared to Fall 2020, the Recommended Plan would result in a 27.9% increase in access to transit for the average resident of the Title VI service area, regardless of race/ethnicity or income (Table 4).

The average BIPOC resident in the service area would experience a 24.5% increase in transit service, while the average non-Hispanic white resident would receive a greater increase of 30.1% (Table 4). However, the corresponding comparison index of 0.81 ($24.5\%/30.1\% = 0.81$) is just above the minimum threshold for avoiding disparate impact (0.80, four-fifths). **Therefore, this analysis identifies no disparate impact on BIPOC residents as a result of the proposed service changes.**

Table 4. Average Percent Change in Service by Population Group

Population Group	Service Area Population	Percent of Service Area Population	Population-Weighted Average Percent Change in Service	Comparison Index*	Disparate Impact/Disproportionate Burden (Index <0.80)
BIPOC	113,693	38.4%	+24.5%	0.81	No
Non-Hispanic White	180,653	61.6%	+30.1%	-	-
Low-Income	43,283	15.0%	+22.1%	0.76	Yes
Non-Low-Income	243,652	85.0%	+29.1%	-	-
Total	294,346	100.0%	+27.9%	-	-

*Example: $24.5\%/30.1\% = 0.81$

Results are similar based on income status, though the conclusions differ. The average low-income resident in the service area would experience a 22.1% increase in transit service under the Recommended Plan, while non-low-income residents would receive a slightly greater increase of 29.1%, on average (Table 4). The corresponding comparison index of 0.76 is below the minimum threshold for avoiding disproportionate burden (0.80, four-fifths). **Therefore, this analysis identifies disproportionate burden on low-income populations as a result of the proposed service changes under the Recommended Plan.**

However, upon further investigation, the differences between the positive outcomes for BIPOC and non-Hispanic white residents and between low-income and non-low-income residents appear to be inflated in part due to limitations of the service equity analysis methodology, particularly its inability to account for improved access to jobs and services, a primary goal of the project. Further, the disruption of service from the COVID-19 pandemic distorts the “current” scenario (Fall 2020). These dynamics are described in greater detail in the following section.

Interpretation

The results of the service equity analysis show no disparate impact on BIPOC populations but do show disproportionate burden on low-income populations. According to FTA Circular 4702.1B:

At the conclusion of the analysis, if the transit provider finds that low-income populations will bear a disproportionate burden of the proposed major service change, the transit provider should take steps to avoid, minimize, or mitigate impacts where practicable. The provider should also describe alternatives available to low-income passengers affected by the service changes (page IV-18).

Metro Transit has explored opportunities to avoid, minimize, or mitigate the impacts that resulted in the finding of disproportionate burden on low-income residents. Staff have re-reviewed the Recommended Plan seeking opportunities to increase the percent change in service to the average low-income resident such that the resulting comparison index rises about the 0.80 minimum threshold. However, no such changes have been identified that also advance the substantial and legitimate goals of the project, which include:

- Link significant concentrations of residents, jobs, and services with the Orange Line
- Retain existing customers and grow ridership. Prioritize service for communities of color, people experiencing poverty, and those who rely on transit the most
- Simplify the route network by emphasizing directness and avoiding branches
- Enhance mobility and connectivity of the transit network
- Complement existing commuter and express service in the corridor

The Recommended Plan is the result of multiple rounds of extensive public engagement with transit riders and other stakeholders using various in-person and virtual engagement strategies. The Recommended Plan is a collection of the latest iterations of service concepts that were developed to meet project goals and were then reviewed and vetted by staff, the public, transit riders, and other stakeholders.

The majority of low-income residents in the service area would experience an increase in transit service. Among the low-income residents that would experience a decrease in transit service, none would be left without a service alternative. There are three subareas within the service area that would experience a decrease in service:

58th St., 34th Ave. and 54th St., where Route 515 is proposed to be eliminated. Alternate service is available two blocks away on Route 22, and Route 7 with the extension between this area and Cedar Point Commons will make connections with Route 515 for service along 66th St. Weekday service to and from VA Medical Center will be provided by a new branch of Route 7 at selected, mainly peak times, operating non-stop between VA Medical Center and Cedar Point Commons at 66th St. and Cedar Ave. for connections with Route 515.

- On 12th Ave. and American Blvd. south of 76th St., where Route 515 would no longer operate. Routes 5 (part of the High Frequency Network) and 542 will continue to serve this area on American Blvd.
- On 102nd St. and 104th St., where the Route 535 E branch would be replaced by Route 553, would decrease. Service along 104th St. would not be replaced, though Route 553 would be just two blocks north.

In each of these subareas, low-income residents make up less than 14% of residents, less than the service area average of 15% (Table 4).

Despite this finding of disproportionate burden on low-income residents according to existing Metro Transit Title VI service equity analysis methods, staff firmly believe that the Recommended Plan does not diminish benefits to low-income residents at the expense of increasing the benefits to non-low-income residents. Rather, the technical results based on existing Metro Transit Title VI methods do not account for several factors, including access to destinations and the impact of COVID-19 on service levels.

Access to Jobs

Given data limitations, the service equity methodology only accounts for the demographics of the population living near stops and stations served by study area routes, as opposed to the actual riders of those routes. Further, this service equity analysis fails to capture the change in access to destinations like jobs and service and the subsequent benefits to those living elsewhere in or outside of the study area. For example, the purpose of proposed Route 547 is to provide a connection to the Orange Line that enables reverse commute trips to the many jobs and services based in southwest Bloomington. There are relatively greater proportions of non-Hispanic white and non-low-income residents living near Route 547 compared to other parts of the study area (Figure 5, Figure 6). Despite the legitimate justification of providing access to clusters of jobs and destinations in this area, the service change would appear to benefit non-Hispanic white and non-low-income residents disproportionately. This exemplifies the limitations of the service equity analysis methodology and using Census data based on place of residence. Instead, the service equity analysis results should be understood in context of project goals and other measures of impacts presented in the full Recommended Plan report (available at metrotransit.org/OLCB), notably accessibility improvements.

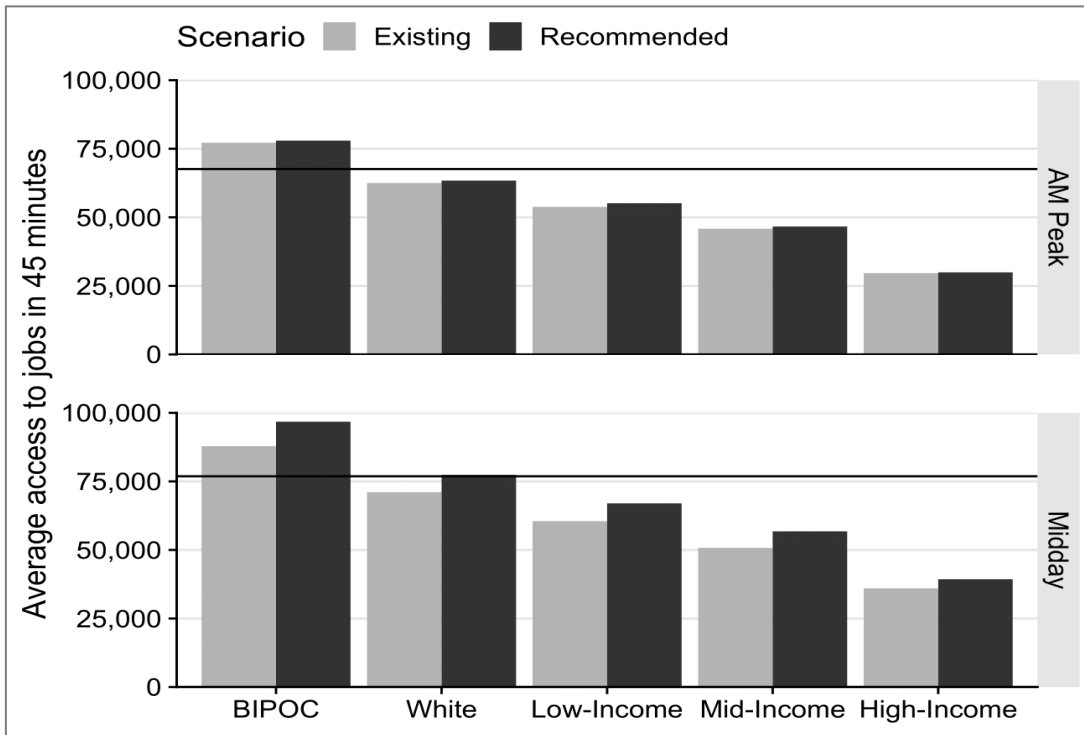


Figure 9. Change in Access to Jobs in 45 minutes by Time of Day, Race/Ethnicity, and Job Earnings

Access to jobs in the Orange Line study area improves during both peak and off-peak hours. It is most notable for low-wage jobs that tend to be more often part-time, with start or end times in the midday, as evidenced in Figure 9. Low-income residents in the study area benefit from access to jobs, particularly low-wage and mid-wage jobs, given the non-transportation barriers that low-income people have to accessing high-wage jobs.¹⁰ On average, a resident in the study area can access about the same number of low-wage jobs during the AM peak, but BIPOC residents gain access to more jobs than non-Hispanic white residents. All demographic groups see an increase of access to jobs in the midday with the largest improvement experienced by BIPOC communities. Jobs are important but not the only things that become easier to reach. Supermarkets, pharmacies, schools, and places of worship all become more accessible especially during the off-peak hours.

The Recommended Plan distributes transit access better to suburban jobs in Burnsville, near Mall of America, along I-494, western Edina, and in southwest Bloomington; the midday access to these areas

¹⁰ A. Legrain, R. Buliung, A. El-Geneidy. Travelling fair: targeting equitable transit by understanding job location, sectorial concentration, and transit use among low-wage workers. *Journal of Transport. Geography*, 52 (2016), pp. 1-11. Available at <https://www.sciencedirect.com/science/article/abs/pii/S0966692316301491>. is improved the most. Today, job access via transit in these areas is relatively worse compared to areas in the northern half of the study area, where the transit network is and has historically been more robust. Complete results of the accessibility analysis completed based on the Recommended Plan are available at metrotransit.org/OLCB.

Impact of COVID-19

It is critical to understand the results of the service equity analysis in context of the impacts that the COVID-19 pandemic has had on Metro Transit service levels. This analysis compares service levels from the Recommended Plan to those from Fall 2020, and the results are reported as percent change in weekly schedule bus trips available to residents. However, multiple existing study area routes (e.g., 537, 542, 578, 597, etc.) were either suspended or operating at limited levels in Fall 2020 in response to COVID-19. The populations living near these routes are more likely to be non-Hispanic white and non-low-income when compared to the study area as a whole. More broadly, the service reductions in response to COVID-19 were distributed such that the voluntary service equity analysis conducted by Metro Transit for COVID-related service changes found no disparate impact on BIPOC residents nor disproportionate burden on low-income residents. In fact, the average BIPOC resident and average low-income resident were notably less negatively affected than non-Hispanic white and non-low-income residents, respectively.

When adding back service to these largely non-Hispanic white and non-low-income areas as part of the Recommended Plan, to meet legitimate project goals, the percent change in service shows as a

greater increase than it would be under more typical, pre-COVID-19, service conditions, in which the service would already exist. Under the service equity analysis methodology, adding service (as part of the Recommended Plan) where there is none currently (due to COVID-19) results in a greater than 100% increase in service. As such, comparing proposed service levels from Recommended Plan to non-existent or significantly reduced service from Fall 2020 artificially inflates the average percent increase in service for non-Hispanic white and non-low-income residents. In turn, this reduces the comparison index closer to 0.80 than would otherwise occur had the representation of “current” service been more typical.

Absolute Change in Access to Transit

Lastly, it is important to note that, in absolute terms, BIPOC and low-income residents would receive a larger increase in the number of weekly scheduled bus trips available compared to non-Hispanic white and non-low-income residents, respectively, on average. Metro Transit’s established service equity analysis methodology compares the relative (percent) change in weekly scheduled transit trips for the average resident of different target population groups. When applied to the Recommended Plan, this methodology produces results supporting the determination of disproportionate burden on low-income residents. However, the results are notably different when considering the absolute change in weekly scheduled transit trips instead of the percent change, as shown in Table 5 and Figure 8.

Table 5. Average Absolute Change in Service by Population Group

Population Group	Service Area Population	Percent of Service Area Population	Population-Weighted Average Absolute Change in Service	Comparison Index*
BIPOC	113,693	38.4%	+258	1.21
Non-Hispanic White	180,653	61.6%	+213	-
Low-Income	43,283	15.0%	+261	1.16
Non-Low-Income	243,652	85.0%	+224	-
Total	294,346	100.0%	+230	-

*Example: $261/224 = 1.16$

Under the Recommended Plan, the proposed service changes result in an absolute increase of 261 weekly scheduled bus trips available to the average low-income resident, compared to 224 for the average non-low-income resident (Table 5). The corresponding comparison index of 1.16 ($261/224 = 1.16$) is well above the minimum threshold for avoiding disparate impact (0.80, four-fifths). The results and findings are similar for the average BIPOC resident compared to the average non-Hispanic white resident. Considering the absolute change in access to transit, BIPOC and low-income residents benefit 21% and 16% more than non-Hispanic white and non-low-income residents, respectively, on average (Table 5).

Conclusions

The results of the service equity analysis show no disparate impact on BIPOC populations but do show disproportionate burden on low-income populations (Table 4) based on Metro Transit's established service equity analysis methodology. Staff have explored opportunities to avoid, minimize, or mitigate the impacts that resulted in the finding of disproportionate burden on low-income residents, though none have been found that also advance the substantial and legitimate goals of the project. While a small proportion of low-income residents would see a decrease in service, all would have alternative services available. Further, though the percent increase in access to transit service is greater for non-low-income residents (29.1%) compared to low-income residents (22.1%), on average, low-income residents would experience a greater absolute increase in access to transit service (261 weekly trips) compared to non-low-income residents (224 weekly trips) [Table 4, Table 5].

Having sought ways to avoid, minimize, or mitigate the impacts on low-income residents; the availability of service alternatives for those low-income residents that would experience service decreases; and considering the analysis findings within the broader context of project goals and the factors described in the Interpretation section above; Metro Transit has decided to continue with the Recommended Plan. Staff firmly believe that the Recommended Plan best meets the project goals and provides important service improvements for all service area residents, including and especially BIPOC and low-income residents.

Summary

FTA requires recipients of federal funding to conduct a Title VI service equity analysis for any proposed service change that meets the agency's "major service change" threshold and for any new fixed guideway capital project. The intended purpose of such analyses is to evaluate service changes at the planning stage to determine whether those changes might have a discriminatory impact based on race, color, national origin, or income.

In conjunction with the introduction of the METRO Orange Line, Metro Transit is proposing service changes to maximize access to the Orange Line. This service equity analysis reviewed the impact of the Orange Line and multiple service changes included as part of the Orange Line Connecting Bus Study Recommended Plan.

The results of the service equity analysis show no disparate impact on BIPOC populations but do show disproportionate burden on low-income populations because of service changes under the Orange Line Connecting Bus Study Recommended Plan.

The average low-income resident in the service area would experience a 22.1% increase in transit service under the Recommended Plan, while non-low-income residents would receive a slightly greater increase of 29.1%, on average (Table 4). The corresponding comparison index of 0.76 is below the minimum threshold for avoiding disproportionate burden (0.80, four-fifths).

However, staff firmly believe this quantitative finding is largely due to limitations of the service equity analysis methodology – notably its inability to account for destinations and improved accessibility – and the current disruption of service due to the COVID-19 pandemic, wherein previously-suspended routes critical to the broader Orange Line connecting bus service network are recommended to be reinstated. Further, it was found that low-income residents would experience a greater absolute increase in the number of weekly scheduled bus trips available near their home (+261) compared to non-low-income residents (+224), on average (Table 5).

Having sought ways to avoid, minimize, or mitigate the impacts on low-income residents; the availability of service alternatives for those low-income residents with service decreases; and considering the analysis findings within the broader context of project goals, methodology limitations, other measures of service benefits, and the impact of service disruptions resulting from the COVID-19 pandemic; Metro Transit has decided to continue with the Recommended Plan. Staff firmly believe that the Recommended Plan best meets the project goals and provides important service improvements for all service area residents, including BIPOC and low-income residents.

Title VI Service Equity Analysis

Routes 63 and 323

May 28, 2020



Prepared by:

Introduction

The Metropolitan Council pledges that the public will have access to all its programs, services, and benefits without regard to race, color, or national origin, in accordance with Title VI of the Civil Rights Act of 1964. This pledge applies to Metro Transit, an operating division of the Metropolitan Council.

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.

Metro Transit is proposing changes to existing Route 63 and the addition of a new route, Route 323, for implementation in September 2020. These changes meet Metro Transit's "major service change" threshold, as defined in the Metropolitan Council's Title VI Program.¹ This analysis fulfills FTA's Title VI requirement as it relates to the analyzing the impacts of major service changes.

A note on the language and terminology used in this report: Many of the terms used in this report such as "BIPOC" 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.

COVID-19 Pandemic

The analysis in this report was completed prior to the COVID-19 pandemic in the United States. In mid-March as part of the shared effort to slow the spread of COVID-19, Metro Transit reduced bus and light rail service by approximately 40 percent. Reductions in service levels due to COVID-19 are not reflected in this report. Rather, the existing or current level of service used in this report is reflective of February 2020.

Metro Transit has asked the public to limit transit use to essential trips only and to those who have no other options than to take transit. Metro Transit continues to monitor and adjust service based on the impacts of COVID-19 on health and safety, ridership, budget, and operator availability.

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.

1
<https://www.metrotransit.org/Data/Sites/1/media/about/titlevi/2020%20Title%20VI%20Program%20Update.pdf>

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.

Metro Transit

Metro Transit 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 annual transit trips taken in the Twin Cities.

Systemwide, Metro Transit provided nearly 80 million rides in 2019 with award-winning, energy-efficient fleets.

Proposed Service Changes

Existing Service

Existing Route 63 (Figure 1) operates within the cities of Saint Paul and Maplewood, connecting the METRO Green Line Westgate Station, downtown Saint Paul, and the Sun Ray Transit Center. Route 63 terminates south of the Sun Ray Transit Center at McKnight Road and Lower Afton Road, along the Saint Paul- Maplewood border. The service operates approximately every 20 minutes during most of the day on weekdays, and every 20-30 minutes on weekends.²

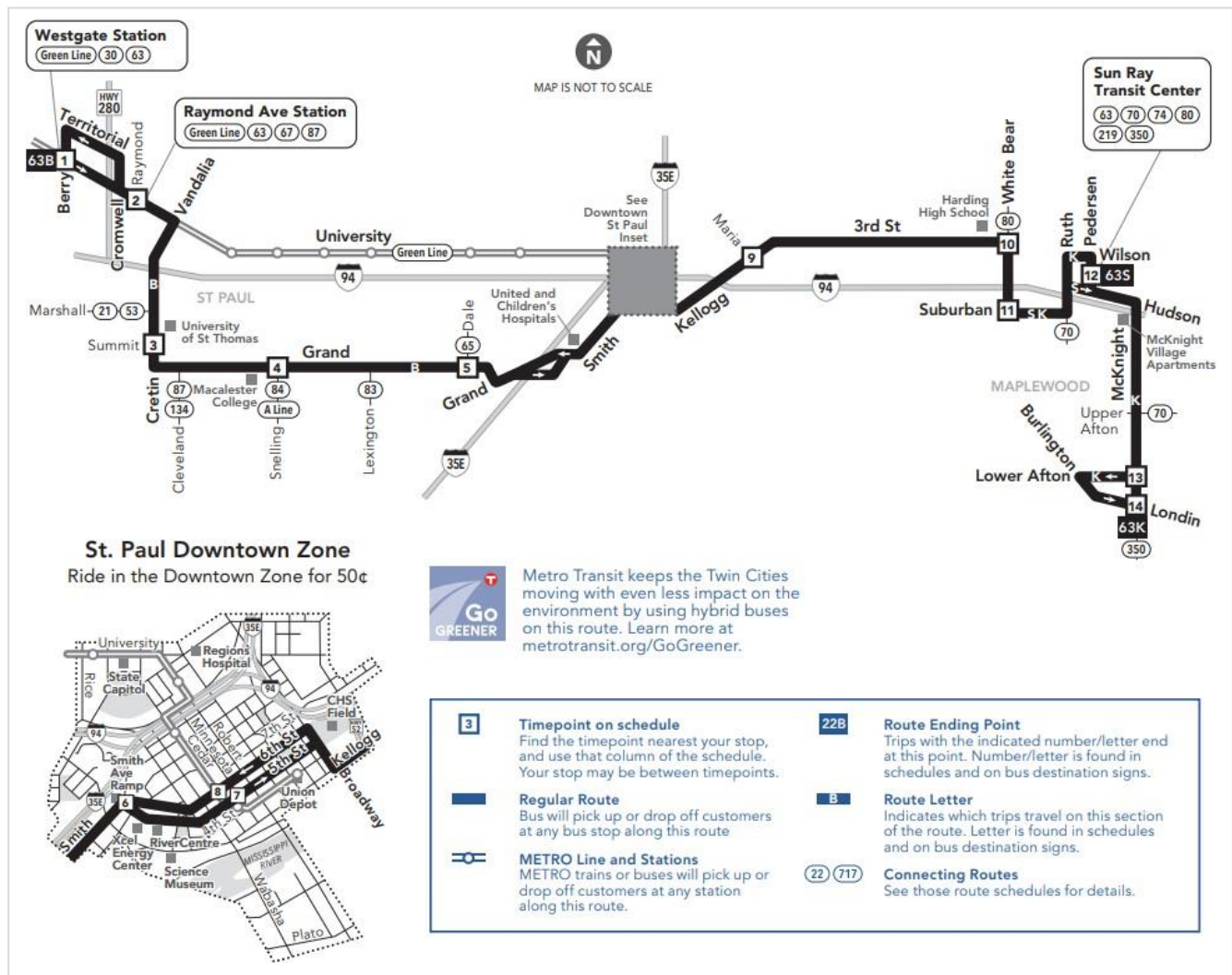


Figure 1. Existing Route 63

Source: www.metrotransit.org/route/63.

² Reductions in service levels due to COVID-19 are not reflected in this report. Rather, the existing or current level of service used in this report is reflective of February 2020.

Proposed Service

Changes reflected in the proposed service are grouped into one of three categories:

- Route 63: Increased frequency and shortening of existing route alignment
- Route 323: Introduction of the new route and new bus stops to be served by it
- Bus stop consolidation within the existing Route 63 corridor

This service equity analysis measures the aforementioned changes and interprets their impacts in the aggregate.

Route 63

Metro Transit is proposing to increase the frequency of Route 63 in Saint Paul to every 15 minutes for most of the day on weekdays and Saturdays. In conjunction, Route 63 would be shortened and terminate at Sun Ray Transit Center (Figure 2). If implemented, a new suburban local route – Route 323 – would replace existing Route 63 service that operates every 20-30 minutes east of Sun Ray Transit Center along McKnight Road to Lower Afton Road/Londin Lane.

Route 323

Route 323 (Figure 2) would travel between Sun Ray Transit Center in Saint Paul and Woodbury Village Shopping Center in Woodbury with improved access to jobs, services, housing and retail. It would also serve Woodwinds Health Campus and Valley Creek Mall. Route 323 would operate as a demonstration to evaluate the demand for all-day service to Woodbury. Proposed operating characteristics for this route are as follows:

- Trips every 30-60 minutes between 6 a.m. and 11 p.m. daily
- 20-minute end-to-end travel time
- Timed connections with Route 63 at Sun Ray Transit Center and transfers to Routes 70, 74, 80, 219, and 350
- Access to three park & ride facilities in Woodbury – Woodbury Theatre, Woodbury Lutheran Church, and Christ Episcopal Church – served by Routes 351, 353, 355, and the planned METRO Gold Line bus rapid transit (BRT)

Route 323 would serve many of the existing bus stops along McKnight Road between Sun Ray Transfer Center and Lower Afton Road/Londin Lane. About 20 new bus stops would be created in Maplewood and Woodbury to be served by Route 323.

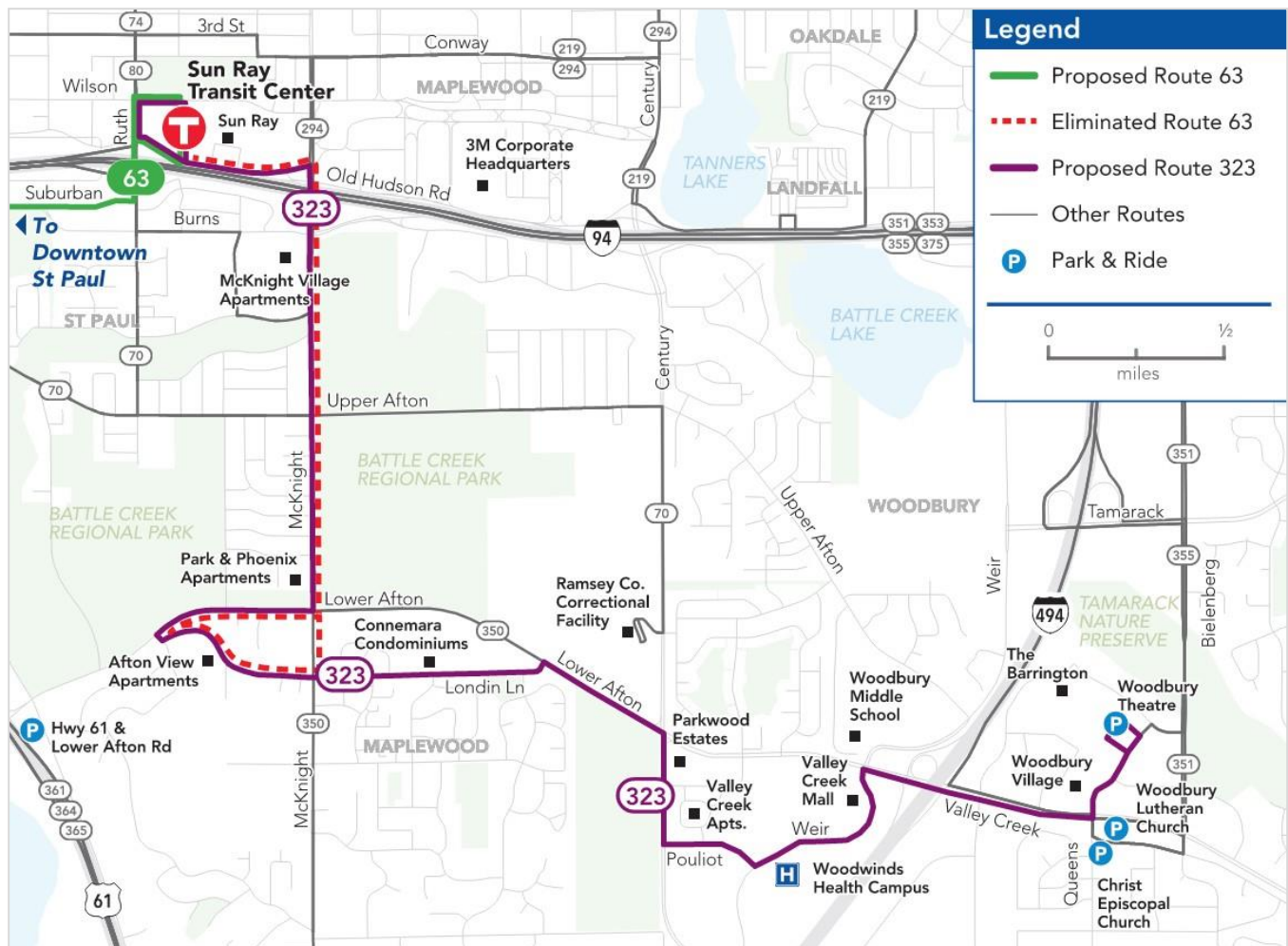


Figure 2. Proposed Routes

Source: www.metrotransit.org/route-323.

Consolidating Bus Stops

Metro Transit is proposing consolidation of some bus stops that are served today by Route 63. This is part of Metro Transit’s Better Bus Routes initiative to improve the rider experience on local bus routes.

Eliminating stops with low ridership or combining two closely spaced stops into a single new stop helps buses spend more time moving and less time stopping. To balance access and travel time, stops may be up to a quarter mile apart. This wider stop placement can:

- Reduce overall travel time
- Help buses run more on-time
- Make the trip more consistent and reduce delays
- Provide a smoother ride with less starting and stopping

About 50 of the nearly 200 existing bus stops served by Route 63 are recommended for removal in the proposed service scenario. These proposed bus stop changes are reflected in this service equity analysis. Metro Transit staff arrived at their bus stop consolidation recommendations after evaluating each existing stop in the Route 63 corridor. Some of the many key factors that staff consider when reviewing bus stops include:

- Distance between stops
- Ridership
- Transfer activity with other bus or rail service
- Adjacent land uses such as hospitals, schools or grocery stores
- Roadway design, including street crossings, signals and pedestrian infrastructure
- Existing transit facilities

Service Change Area

This Title VI service equity analysis for Routes 63 and 323 measures the location and magnitude of proposed service changes within a defined service change area. In this analysis, the service change area is defined as within a quarter mile of all existing and proposed bus stops served by Routes 63 or 323.

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.”³

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 BIPOC 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 BIPOC communities and low-income communities from being subject to disproportionately high and adverse environmental effects.”⁴

To provide direction to recipients of federal funding, FTA issued Circular 4702.1B *Title VI Requirements and Guidelines for Federal Transit Administration Recipients* in 2012.⁵ 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 Routes 63 and 323 satisfies the FTA requirement to evaluate service changes that meet an agency’s major service change threshold.

Title VI Definitions of BIPOC 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 “BIPOC” 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.

BIPOC

FTA defines a BIPOC 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-BIPOC 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 BIPOC persons.

³ <https://www.govinfo.gov/content/pkg/USCODE-2010-title42/pdf/USCODE-2010-title42-chap21-subchapV.pdf>

⁴ <https://www.archives.gov/files/federal-register/executive-orders/pdf/12898.pdf>

⁵ https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf

Low-Income

While low-income populations are not an explicitly protected class under Title VI, 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. 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 63 and 323 Title VI Service Equity Analysis used 2018 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.⁶ The U.S. Census Bureau 2018 poverty thresholds by family size and presence of related children under 18 years are shown in Table 1.

⁶ The distinctions between poverty thresholds and guidelines are described further at: <https://aspe.hhs.gov/frequently-asked-questions-related-poverty-guidelines-and-poverty>.

Table 1. U.S. Census Bureau Poverty Thresholds (in Dollars) for 2018

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)	12,784									
Under 65 Years	13,064	13,064								
65 Years & Over	12,043	12,043								
Two People	16,247									
Householder Under 65 Years	16,889	16,815	17,308							
Householder 65 Years & Over	15,193	15,178	17,242							
Three People	19,985	19,642	20,212	20,231						
Four People	25,701	25,900	26,324	25,465	25,554					
Five People	30,459	31,234	31,689	30,718	29,967	29,509				
Six People	34,533	35,925	36,068	35,324	34,612	33,553	32,925			
Seven People	39,194	41,336	41,594	40,705	40,085	38,929	37,581	36,102		
Eight People	43,602	46,231	46,640	45,800	45,064	44,021	42,696	41,317	40,967	
Nine People or More	51,393	55,613	55,883	55,140	54,516	53,491	52,082	50,807	50,491	48,546

Source: <https://www.census.gov/library/publications/2019/demo/p60-266.html>.

Disparate Impact, Disproportionate Burden, and the 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 where 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 *BIPOC* populations at a rate less than 80 percent (four-fifths) of the benefits being provided to non-BIPOC populations, or
- Adverse effects are being borne by *non-BIPOC* populations at a rate less than 80 percent (four-fifths) of the adverse effects being borne by BIPOC 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 Routes 63 and 323 Service Changes

In this analysis, if the quantitative results indicate that the increase in service levels borne by *BIPOC/low-income* populations is less than 80 percent of the increase in service levels borne by non- *BIPOC/non-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.

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 BIPOC, non-BIPOC, 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 (e.g., quarter mile from a bus stop) 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 BIPOC/low-income and non- BIPOC/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 Metro Transit's 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 measured service from fixed routes with proposed service changes (i.e., Routes 63 and 323) at the bus stop level. Measuring transit service at the bus stop level assigns service only to areas near where a bus may actually pick up and drop off passengers, disregarding non-stop route segments.

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 the centroid of the census block was within a quarter mile of the bus stop (based on the straight line distance). Metro Transit uses the quarter-mile distance as the standard maximum walking distance assumed for access local bus service.

The current service level network represents the conditions as of February 2020, disregarding any current or anticipated short-term detours. The proposed service level network is described in the *Proposed Service* section of this report.

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 people 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 relevant demographic dataset published by the U.S. Census Bureau, the 2014-2018 American Community Survey (ACS) 5-year Estimates, is available only at the census block group level. The 2014-2018 ACS dataset contains estimates that are based on the most recent five years of data collected by the U.S. Census Bureau (2014 through 2018).⁷

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 larger size, it can be difficult to identify location-specific impacts using only block group data.

To provide more granularity and detail to the analysis, BIPOC and low-income populations were estimated at the census block level using a combination of 2014-2018 ACS data and 2010 Decennial Census data. Using a method known as areal interpolation, the 2014-2018 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.⁸ While this approach assumes that the percentage of BIPOC and low-income populations are uniformly distributed throughout the block group comparable to the total population, 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 from Route 63 as of February 2020
- **Proposed:** weekly scheduled trips from Route 63 and Route 323, implemented concurrently in September 2020

⁷ As a collection of estimates, the 2014-2018 ACS data are subject to error, but remain the most reliable and current demographic data readily available for the service area.

⁸ 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 BIPOC and low-income populations estimated in the 2014-2018

This analysis considered only the routes with proposed service changes (i.e., Routes 63 and 323); it did not measure the number of available trips from all fixed-route transit service in the service change area.⁹

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 existing or 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 BIPOC populations was completed by multiplying each census block’s BIPOC population by the percent change in service for that block, summing the results for all blocks in the service change area, and dividing that sum by the total BIPOC population for all blocks in the service change area. The formula used for these analyses is shown in Figure 3.

In this manner, the weighted percent change was calculated individually for the total population, BIPOC population, non-BIPOC 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.

$$\text{Average } \% \Delta = \frac{\sum (\text{Target Population}_{ii} \times \text{Percent Change}_{ii})}{\sum \text{Target Population}_{ii}}$$

Where:

$\text{Target Population}_{ii}$ = Target population of census block i .

$\text{Percent Change}_{ii}$ = Percent change in service levels for census

Figure 3. Formula for Population-Weighted Average Percent Change in Service

⁹ The following routes serve bus stops located within the service change area: METRO Green Line and A Line, Routes 3, 16, 30, 53, 54, 61, 62, 63, 64, 65, 67, 68, 70, 71, 74, 75, 80, 83, 84, 87, 94, 134, 219, 262, 265, 275, 294, 350, 351, 353, 355, 361, 364, 417, and 860. Major service changes are not proposed for any of these routes, aside from Route 63. Given this, the number of weekly trips available from these non-Route 63 routes were not included in the current or proposed service networks modeled in this analysis.

Evaluation of Impacts

Service Change Area Population

The Routes 63 and 323 service change area is defined as within a quarter mile of existing and proposed bus stops served by either route. In total, an estimated 55,641 people live in census blocks within the Routes 63 and 323 service change area. This population includes 21,791 BIPOC persons and 9,465 low-income persons, representing 39.2 percent and 17.7 percent of the service change area population, respectively (Table 2).¹⁰

The distributions of BIPOC and low-income populations within the Routes 63 and 323 service change area are shown in Figure 4 and Figure 5, respectively.

¹⁰ 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 53,557, slightly less than that estimated population as a whole.

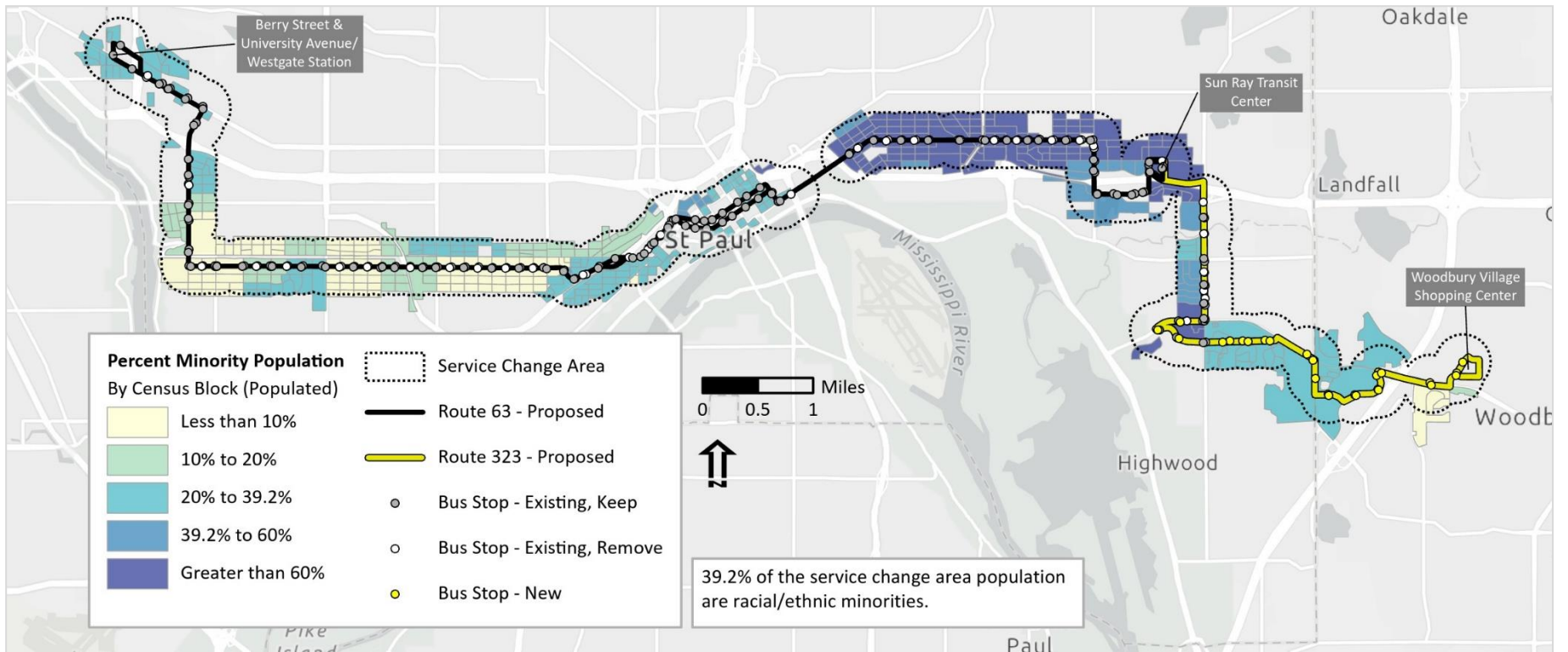


Figure 4. BIPOC Population within the Service Change Area

Source: U.S. Census Bureau 2010 Decennial Census; 2014-2018 American Community Survey 5-Year Estimates, Table B03002; Metropolitan Council.

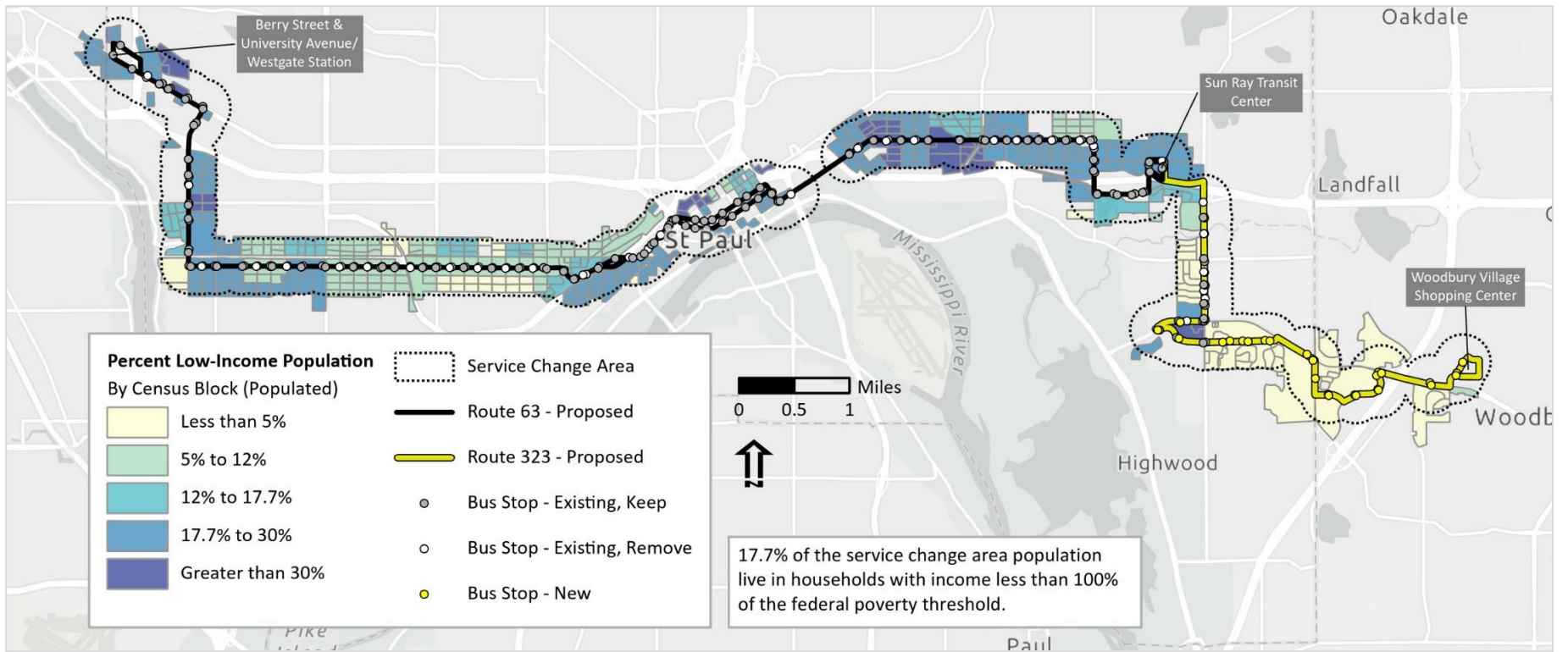


Figure 5. Low-Income Population within the Service Change Area

Source: U.S. Census Bureau 2010 Decennial Census; 2014-2018 American Community Survey 5-Year Estimates, Table C17002; Metropolitan Council.

Average Change in Service by Population Group

The service level impacts to Title VI populations resulting from the proposed service change are assessed by calculating a comparison index between the BIPOC and non-BIPOC results, and between the low-income and non-low-income results. The comparison index is measured as the ratio between the non-BIPOC/non-low-income results and the BIPOC/low-income results. A comparison index less than 0.80 (four-fifths) indicates the potential for disparate impact/disproportionate burden.

The average percent change in service levels for each target population group is summarized in Table 2.

Table 2. Average Change In Service by Population Group

Population Group	Population of Service Change Area	Average Percent Service Change	Comparison Index
BIPOC	21,791 (39.2%)	+17.8%	0.83 ^a
Non-BIPOC	33,851 (60.8%)	+21.5%	
Low-Income	9,465 (17.7%)	+17.4%	0.84 ^b
Non-Low-Income	44,092 (82.3%)	+20.8%	
Total	55,641 (100%)	+20.1%	

^a $17.8/21.5=0.83$

^b $17.4/20.8=0.84$

On average, the proposed service changes result in a notable increase 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 projected to experience a 20.1 percent increase in transit service, as measured by number weekly scheduled trips (Table 2).

The average BIPOC individual in the service change area would experience a 17.8 percent increase in transit service (Table 2). This increase is less than the average increase in transit service for non-BIPOC individuals, 21.5 percent. However, the resulting comparison index of 0.83 is within the four-fifth threshold (>0.80). **Therefore, per Metropolitan Council Title VI policies, this analysis identifies no potential for disparate impacts to BIPOC populations as a result of the proposed service changes.**

The average low-income individual in the service change area would experience a 17.4 percent increase in transit service. This increase is less than the average 20.8 percent increase in transit service for non-low-income individuals (Table 2). However, the resulting comparison index of 0.84 is within the four-fifth threshold (>0.80). **Therefore, per Metropolitan Council Title VI policies, 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 6. Areas with no population are excluded from the figure. Nearly all census

block within the service change area – 93 percent – would receive an increase in service.

Most of the service change area – from Berry Street and University Avenue to Sun Ray Transit Center – would receive an 18 percent or greater increase in weekly scheduled transit trips, attributable to increased frequency of Route 63 (Figure 6). Approximately 46,500 residents would benefit from this improvement.

The greatest percent increase in service within the service change area would be east of McKnight Road, where the new Route 323 would connect to Woodbury Village Shopping Center. This area is today unserved by all-day fixed route transit.

Those living near McKnight Road south of I-94 where existing Route 63 service will be replaced by the new Route 323 would experience a 32 percent decrease in weekly scheduled trips. Such a change would replace service operating every 20-30 minutes (from existing Route 63) with that which would operate every 30-60 minutes (from proposed Route 323).

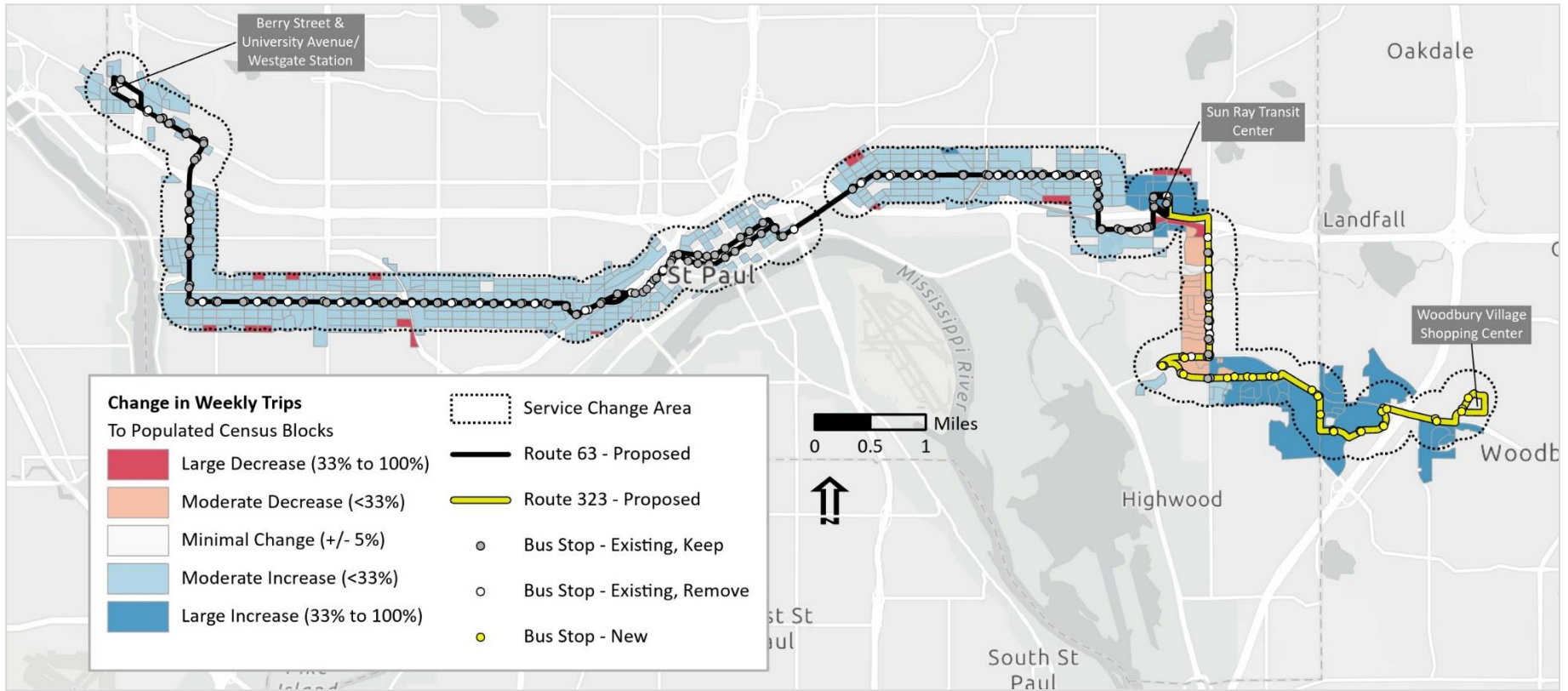


Figure 6. Service Level Change by Census Block

Source: U.S. Census Bureau 2010 Decennial Census; 2014-2018 American Community Survey 5-Year Estimates; Metropolitan Council.

Impact on the Metro Mobility ADA Service Area

Routes 63 and 323 are subject to requirements under the Americans with Disabilities Act (ADA), which state that comparable paratransit service must be guaranteed 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).¹¹

The service changes to Routes 63 and 323 will not change the Metro Mobility Service Area, the larger of the two service areas. However, the introduction of Route 323 will increase the size of the weekday, Saturday, and Sunday federally mandated ADA service areas. This change will increase the area where Metro Mobility reserved trips are guaranteed (under ADA) and, conversely, decrease the area where reserved trips can be placed on standby.

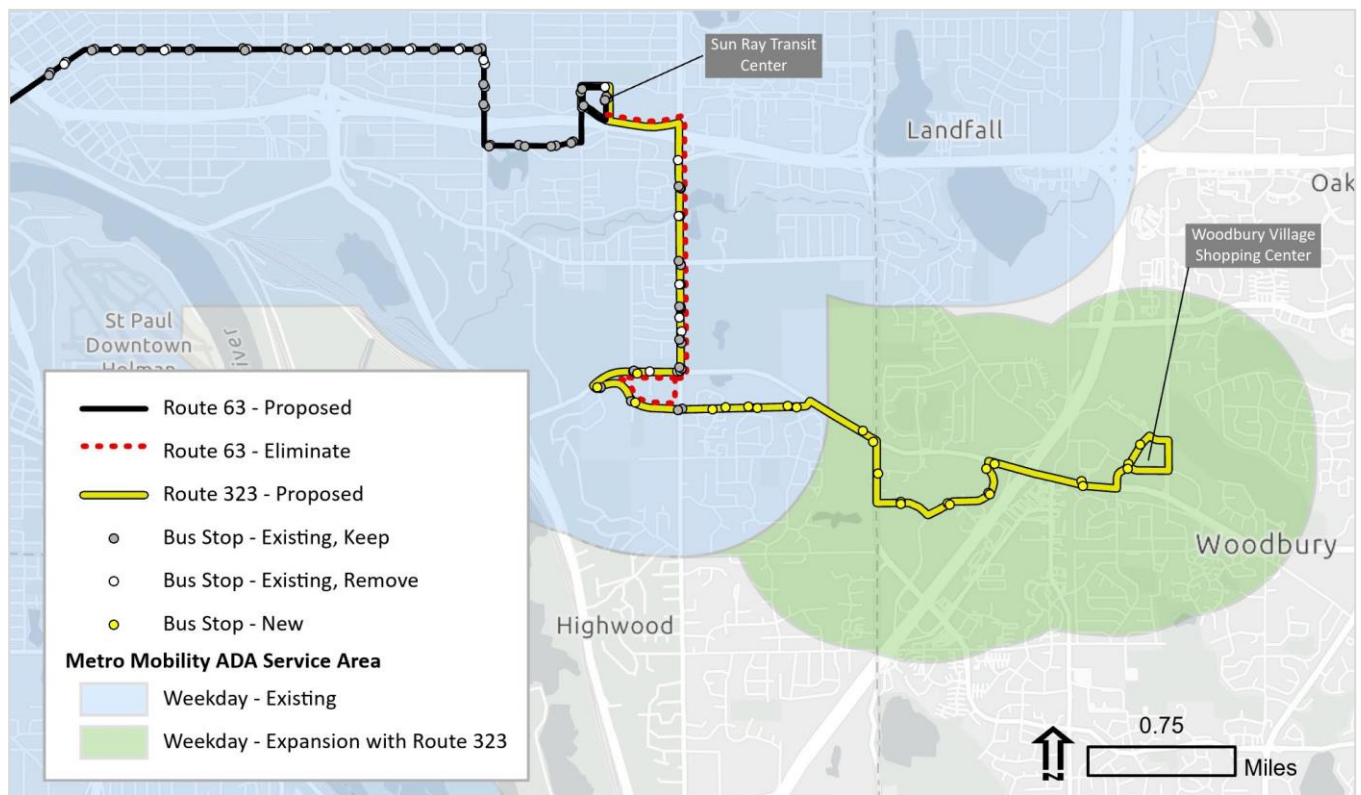


Figure 7. Route 323 Impact on Metro Mobility Federally Mandated (ADA) Service Area

Source: Metropolitan Council.

¹¹ 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>.

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 changes to Route 63 and introduction of the new Route 323 on BIPOC and low-income populations.

After conducting the technical analysis and applying Metro Transit's Title VI policies in accordance with the Metropolitan Council's Title VI Program, **this review finds that the proposed service changes will not result in disparate impacts to BIPOC populations or disproportionate burdens to low-income populations.**

The average individual in the service change area – regardless of race, ethnicity, or low-income status – would experience a 20.1 percent increase in transit service, as measured by number weekly scheduled trips (Table 2). The average BIPOC and low-income resident would benefit from the change but benefit slightly less than the average non-BIPOC and non-low-income resident, respectively. However, the comparison indices based on both BIPOC and low-income status are above the 0.80 (four-fifths) threshold that Metro Transit and the Metropolitan Council use as an indicator of the potential for disparate impact or disproportionate burden.

Shown in Figure 6, most residents in the service change area west of Sun Ray Transit Station would benefit from the proposed frequency improvements to Route 63. Approximately 46,500 residents would receive an 18 percent or greater increase in weekly scheduled transit trips. Further, the new Route 323 would introduce all-day local transit service between Sun Ray Transit Center in Saint Paul and Woodbury Village Shopping Center in Woodbury, providing improved access to jobs, services, housing, and retail destinations. The introduction of Route 323 would increase the weekday, Saturday, and Sunday Metro Mobility federally mandated (ADA) service areas.

D Line Approval

Title VI Service Equity Analysis

Introduction of the METRO D Line & Local Service Changes to Routes 5, 39, 133, 721, and 724

July 2022



Prepared by:



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.

Metro Transit

Metro Transit is the transportation resource for the Twin Cities, offering an integrated network of buses, light rail, and commuter trains, as well as resources for those who carpool, vanpool, walk, or bike. Metro Transit is developing a network of enhanced transitways throughout the region.

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CHAPTER 1: INTRODUCTION

Metro Transit and the Metropolitan Council are preparing to introduce the METRO D Line bus rapid transit (BRT) route in December 2022. The 18-mile D Line will substantially replace Route 5 with faster, frequent, and all-day service, and will connect neighborhoods and destinations in Brooklyn Center, Minneapolis, Richfield, and Bloomington. These and other proposed service changes to connecting routes are the subject of this Title VI service equity analysis.

The Metropolitan Council pledges that the public will have access to all its programs, services, and benefits without regard to race, color, or national origin, in accordance with Title VI of the Civil Rights Act of 1964. This pledge applies to Metro Transit, an operating division of the Metropolitan Council.

Report Purpose

The purpose of this report is to review planned service changes associated with the implementation of the METRO D Line rapid bus project to ensure the impacts of those changes would be made in a nondiscriminatory manner on the basis of race, color, national origin, and low-income status.

In this and all Metro Transit Title VI service equity analyses, the impact of the service change is measured by the change in service availability – or access to transit. Put another way, we quantify how much transit service is within a reasonable walk or roll from one’s home, and how that would change under the proposed scenario. This is measured by the number of weekly scheduled transit trips (count of trips from public route schedules) available to each census block and the people that live within it.

Specifically, this analysis reviewed the extent to which the percent change in weekly scheduled transit trips differs between Black, Indigenous, and people of color (BIPOC) residents and white non-Hispanic residents, and between low-income residents and non-low-income residents. The results will help determine whether there may be disparate impact on the basis of race, color, national origin, or disproportionate burden on low-income populations.

Federal Requirements

The Federal Transit Administration (FTA) requires recipients of federal funding, including Metro Transit, to ensure communities of color and people with lower incomes do not experience discrimination in the level and quality of public transportation service. This FTA requirement stems from Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance; and President Clinton’s *Executive Order 12898 - Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* (1994), which directed federal agencies to consider impacts to low-income populations as well.

As part of this effort, FTA requires transit providers such as Metro Transit to conduct a Title VI service equity analysis, prior to implementation, for any proposed service change that meets the agency’s “major service change” threshold (defined in *Chapter 3: Title VI Principles and Definitions*). This analysis fulfills this requirement as it relates to proposed service changes as part of implementing the METRO D Line.

CHAPTER 2: PROPOSED SERVICE CHANGES

D Line Project

Metro Transit is planning improvements to the Route 5 corridor with the METRO D Line BRT project. Construction of the D Line BRT project began in March 2021 and is continuing in 2022, with revenue service beginning in late 2022. The D Line will substantially replace Route 5 with fast, frequent, and all-day service.

The D Line corridor stretches approximately 18 miles from the Brooklyn Center Transit Center (BCTC) in Brooklyn Center to the Mall of America Transit Center in Bloomington, serving Fremont/Emerson Avenues in north Minneapolis, 7th/8th Streets in downtown Minneapolis, Chicago Avenue and Portland Avenue in south Minneapolis, Portland Avenue in Richfield, and American Boulevard in Bloomington (Figure 1).

Arterial bus rapid transit, or BRT, is a package of transit enhancements that produces a faster trip and an improved experience for customers in the Twin Cities' busiest bus corridors. It runs on urban corridors in mixed traffic.

The D Line will help deliver more equitable service in a corridor that has the region's highest ridership, even during the pandemic. One in four households on the corridor doesn't own a car and relies on transit to get to work, play, and run errands.

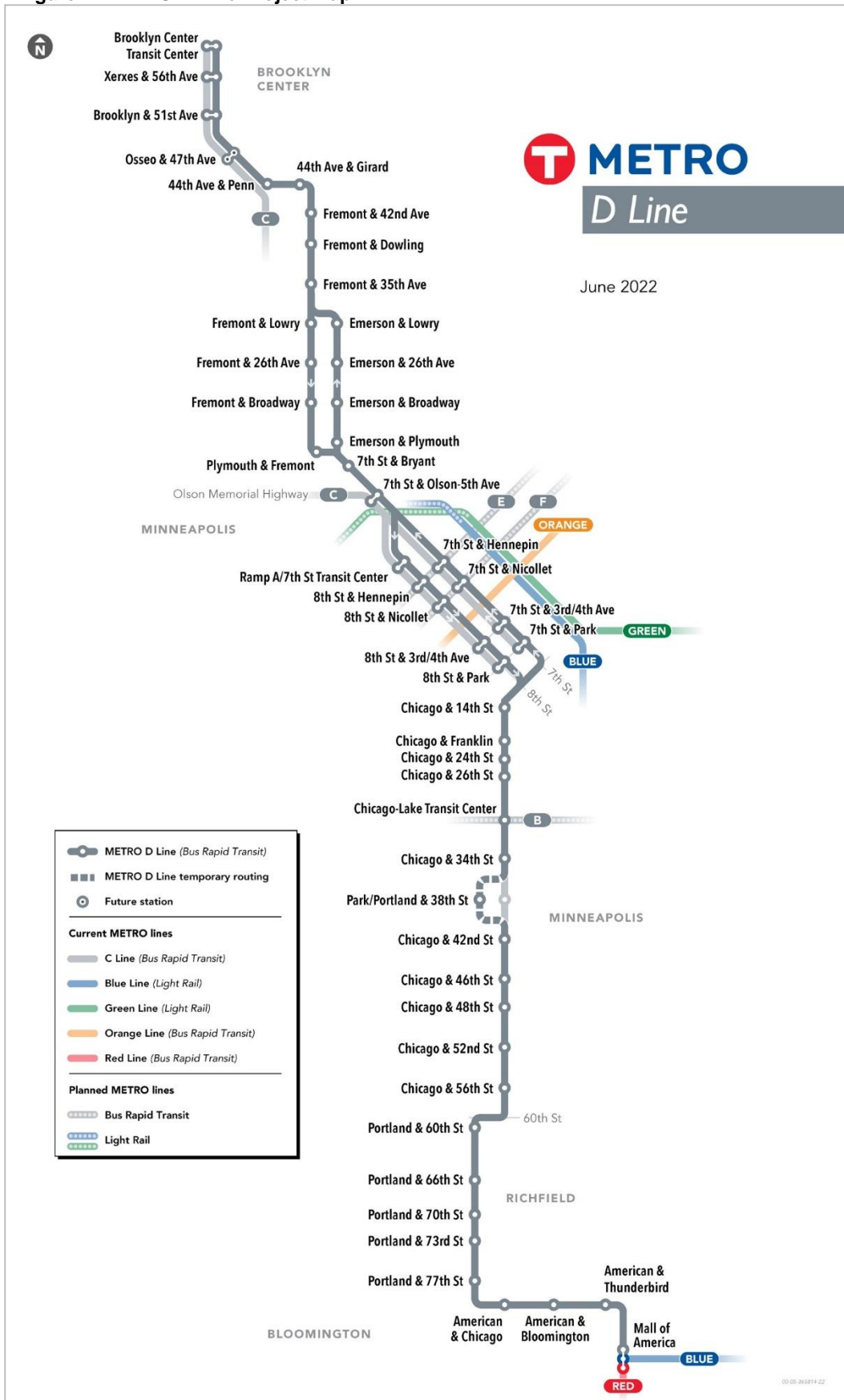
Service Plan

The D Line will operate between BCTC and the Mall of America Transit Center in Bloomington. The D Line will become the primary service in the corridor, running every 10-15 minutes throughout the day with increased service on nights and weekends – every 10-15 minutes – compared to existing Route 5 service. Route 5 will continue to operate within the corridor but with changes to its alignment and at reduced frequency of once every 30 minutes.

As shown in Figure 1, the D Line will serve 40 enhanced station areas¹, spaced approximately every half-mile. More distance between stations significantly increases overall travel speeds when compared to local bus stop spacing of 1/8 mile (the length of a north-south block in Minneapolis), while also allowing for most customers to access stations comfortably on foot.

¹ Generally, pairs or one-way station platforms. Nine of the D Line station areas are existing, with eight having been constructed as part of the C Line; the ninth, Mall of America Transit Station, is served today by the Red Line (BRT) and Blue Line (light rail).

Figure 1. METRO D Line Project Map



Planning Process

BRT on the Chicago-Emerson/Fremont corridor was prioritized for implementation by adoption into the amended 2030 Transportation Policy Plan in 2013 and the 2040 Transportation Policy Plan in 2015. Since that time, Metro Transit has implemented a D Line planning process that includes a mix of interagency coordination, data analysis and review, and community outreach and engagement.

- 2016-2017: Preliminary planning, with inputs from interagency coordination and community outreach and engagement
- 2018: Draft station plan, community input, recommended station plan, public review, and approved station plan
- 2018-2019: Detailed design and engineering, project coordination
- 2020-2022: Construction, project coordination

The D Line Final Station Plan was approved by the Metropolitan Council in July 2018, with amendments adopted in April 2022.

The D Line will be the third operational arterial BRT system line within the Twin Cities region. The A Line on Snelling Avenue and Ford Parkway began service in June of 2016, and the C Line on Penn Avenue and downtown Minneapolis opened in June 2019.

Local Service Changes

Metro Transit is proposing changes to other routes that operate within or connect to the D Line corridor, including Routes 5, 39, 133, 721, and 724. Arterial BRT stations are spaced approximately every half-mile, focusing on upgrading stops to stations where the greatest numbers of customers board buses today. The local service plan ensures continued service between D Line stations where station spacing is greater and where warranted by historical demand.

The D Line will operate between BCTC in Brooklyn Center (northern terminal) and the Mall of America Transit in Bloomington (southern terminal). Changes to local service as part of the D Line service plan are summarized below.

- **Route 5** will be substantially replaced by the D Line, with changes to its alignment and frequency. Route 5 will continue to operate within the majority of the corridor to provide continued local service every 30 minutes for customers who cannot or choose not to walk to a nearby station.

On the southern end of the route, rather than continue to Mall of America Transit Center in Bloomington (the current southern terminal), Route 5 would end at Chicago Avenue and 56th Street in Minneapolis. On the northern end, when Osseo Road is under construction Route 5 would operate on detour between 44th Avenue and 49th Avenue and continue to serve BCTC as its northern terminal. However, long-term, the northern terminal of Route 5 would shift south to the Osseo & 47th Avenue D Line station.²

² Following completion of the Hennepin County-led construction project on Osseo Road, which will start Spring 2023.

Lastly, the “F” branch of the current Route 5 would be eliminated with the introduction of the D Line. Route 5F is unique in that it serves 26th Avenue between Emerson and Penn avenues in north Minneapolis every 30-60 minutes. To continue accessing the D Line / Route 5 corridor, Route 5F riders would be required to walk / roll up to 0.70 miles east to access D Line stations at 26th Avenue and Emerson (northbound) and Fremont (southbound) avenues. However, these riders would continue to have Route 14 as an alternative to connect to the D Line / Route 5 corridor. Moreover, Route 5F riders seeking access to either downtown Minneapolis or BCTC can use the METRO C Line or Route 19, which operate along Penn Avenue. (Note: the Route 19 was suspended in December 2021 due to historic operator shortage) Just one stop currently served by Route 5F, at 26th Avenue and Knox Avenue, is not within one-quarter mile of alternative service; the stop has less than 10 average daily boardings.

- **Routes 39 and 133** will be eliminated when D Line service begins. Both routes have been suspended since spring 2020 in response to changes in transit demand in light of the COVID-19 pandemic, and historic operator shortages. Route 39 previously operated as a supporting local route that many riders used as a sort of shuttle service between downtown Minneapolis and employers such as Wells Fargo Home Mortgage and medical campuses near Lake Street. Operating weekdays only, Route 39 primarily operated on Park and Portland Avenues, parallel to the Chicago Avenue / D Line corridor. To reach the Chicago Avenue / D Line corridor, Route 39 riders would be required to walk / roll about 0.30 miles east or use local Route 27 (no changes are proposed to this route as part of the project).

Route 133 previously operated as a weekday-only Commuter & Express route between the Gateway Ramp in downtown Minneapolis and 56th Street in south Minneapolis. The route operated express between Gateway Ramp and 38th Street, and with local stop spacing south of 38th Street. Local service was available on Chicago Avenue (the D Line corridor) between 38th Street and 54th Street; on 54th Street between Chicago Avenue and Bloomington Avenue; on Bloomington Avenue between 54th Street and 46th Street; before ending on 46th Street near McRae Park, two blocks east of Chicago Avenue. To reach the Chicago Avenue / D Line corridor, Route 133 riders would be required to walk / roll as much as one half-mile west or use local Routes 14 or 46 (no changes are proposed to either route as part of the project).

- **Route 721** will no longer operate south of BCTC when the D Line is introduced. Route 721 is a suburban local route operating seven days per week serving areas north and west of BCTC and the D Line corridor. On weekdays, three of about 30 daily directional Route 721 trips operate south of BCTC to serve peak-period commute trips oriented toward downtown Minneapolis. Today, the six daily trips to / from downtown Minneapolis operate within the D Line corridor along Brooklyn Boulevard / Osseo Road, 44th Avenue, Fremont Avenue, and Dowling Avenue before operating express along I-94 into downtown (reverse in the afternoon rush hour). The D Line will replace this service.
- **Route 724**, like Route 721, will no longer operate south of BCTC when the D Line is introduced. Route 724 is a suburban local route operating seven days per week serving areas north of BCTC and the D Line corridor. Prior to the COVID-19 pandemic, Route 724 operated 16 of its 40 daily directional trips south of BCTC – through the D Line corridor – to serve peak-period commute trips oriented toward downtown Minneapolis, similar to the operations of Route 721. Today, in light of changes resulting from the pandemic, all trips operate north of BCTC. This

temporary change will be made permanent with the introduction of the D Line, which will serve these same trips patterns.

Table 1 and Table 2 list the number of daily and weekly scheduled transit trips, respectively, under existing and proposed scenarios. The D Line alone will operate slightly fewer weekday daily scheduled transit trips than the existing Route 5 (September 2019) – 197 compared to 216 (Table 1). However, the incorporation of underlying local service from the modified Route 5 along with the D Line would increase the number of weekday daily scheduled transit trips by 27%.

The D Line would significantly increase the number of daily scheduled transit trips on weekends. Considering service from the D Line and Route 5, the proposed changes would increase Saturday and Sunday service by 56% and 83%, respectively (Table 1). On a weekly basis – accounting for weekdays and weekends – the number of scheduled transit trips from the D Line and Route 5, combined, would increase nearly 37%, as shown in Table 2.

Table 1. Daily scheduled trips by route by service day

“Existing” is representative of typical conditions, whether pre-COVID-19 (September 2019) or March 2022

--	Wk.	Wk.	Wk.	Wk.	Sat.	Sat.	Sat.	Sat.	Sun.	Sun.	Sun.	Sun.
Route	Existing	Proposed	Change	%Change	Existing	Proposed	Change	%Change	Existing	Proposed	Change	%Change
D Line	0	197	197	100%	0	196	196	100%	0	184	184	100%
5*	216	78	-138	-64%	175	77	-98	-56%	142	76	-66	-46%
39**	8	0	-8	-100%	0	0	0	NA	0	0	0	NA
133**	9	0	-9	-100%	0	0	0	NA	0	0	0	NA
721*	54	54	0	0%	44	44	0	0%	44	44	0	0%
724**^	79	77	-2	-3%	71	69	-2	-3%	65	65	0	0%
Total	366	406	40	11%	290	386	96	33%	189	369	180	95%
Total: D & 5	216	275	59	27%	175	273	98	56%	142	260	118	83%

*Existing = March 2022. **Existing = September 2019. ^Route 724 operated in March 2022 but did not serve areas south of Brooklyn Center Transit Center, including downtown Minneapolis, as it typically would; as such, September 2019 was used to represent existing conditions.

Table 2. Weekly scheduled transit trips by route

“Existing” is representative of typical conditions, whether pre-COVID-19 (September 2019) or March 2022

Route	Existing	Proposed	Change	%Change
D Line	0	1,365	1,365	100%
5*	1,397	543	-854	-61%
39**	40	0	-40	-100%
133**	45	0	-45	-100%
721*	358	358	0	0%
724**^	531	519	-12	-2%
Total	2,371	2,785	414	17.5%
Total: D & 5	1,397	1,908	511	36.6%

*Existing = March 2022. **Existing = September 2019. ^Route 724 operated in March 2022 but did not serve areas south of Brooklyn Center Transit Center, including downtown Minneapolis, as it typically would; as such, September 2019 was used to represent existing conditions.

Major Service Change

Some of the proposed changes summarized above meet the threshold for a “Major Service Change” as defined in Metro Transit and the Metropolitan Council’s Title VI Program.³

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% 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

Table 3 lists the number of daily in-service hours under existing and proposed scenarios by route and service day. In-service hours are the cumulative time between the first timepoint and last timepoint on the public schedule; essentially, the time in which passengers can ride.

The proposed changes to existing Routes 5 and 721 meet the definition of a major service change based on the greater than 25% decrease in the number of daily in-service hours.

The proposed elimination of Routes 39 and 133 would meet the major service change definition, however, both routes would have alternative service within one half mile, and the decrease in annual in-service hours on either route does not meet the 3,500-hour minimum.⁴ Despite this technicality, the impacts of eliminating Routes 39 and 133 are included in this analysis.

While the D Line does not technically meet the definition of a major service change,^{5,6} Metro Transit has historically chosen to conduct a service equity analysis when introducing a new METRO Line.

The package of service changes proposed as part of implementation of the D Line – “major service changes” and others – were designed with specific consideration of travel patterns and the interconnectivity of routes, in addition to ridership demand and operational reliability. As such, and in keeping with past practice, this service equity analysis evaluates the impacts of the package of route changes in the aggregate.

³ Metropolitan Council, *Title VI Program*, January 2020, <https://www.metrotransit.org/Data/Sites/1/media/about/titlevi/2020%20Title%20VI%20Program%20Update.pdf>.

⁴ Under “existing” or “typical” conditions (represented here as September 2019), Routes 39 and 133 each operate less than 3 daily in-service hours. The decreases in annual in-service hours to Routes 39 and 133 are 544 hours and 642 hours, respectively, less than the 3,500 annual in-service hour minimum to qualify as a major service change.

⁵ Taken by itself, the D Line is not an existing route (subpart (a) of the major service change policy), does not introduce service to a new coverage area (subpart (b)), and is not part of restructuring of a sector or sub-area as defined by Metro Transit (subpart (c)).

⁶ The D Line is not a New Start, Small Start, or other new fixed guideway capital project. Thus, it is not subject to the requirement to complete a service equity analysis on that basis alone (Circular 4702.1B, page IV-21).

Table 3. Daily in-service hours by route by service day

“Existing” is representative of typical conditions, whether pre-COVID-19 (Fall 2019) or March 2022

--	Wk.	Wk.	Wk.	Wk.	Sat.	Sat.	Sat.	Sat.	Sun.	Sun.	Sun.	Sun.
Route	Existing	Proposed	Change	%Change	Existing	Proposed	Change	%Change	Existing	Proposed	Change	%Change
D Line	0.0	220.4	220.4	100.0%	0.0	213.8	213.8	100.0%	0.0	198.9	198.9	100.0%
5*	252	77.8	-174.2	-69.1%	208	75.9	-132.1	-63.5%	162	72.7	-89.3	-55.1%
39**	2.1	0.0	-2.1	-100.0%	0.0	0.0	0.0	NA	0.0	0.0	0.0	NA
133**	2.5	0.0	-2.5	-100.0%	0.0	0.0	0.0	NA	0.0	0.0	0.0	NA
721*	21.7	20.0	-1.7	-7.9%	14.7	14.7	0.0	0.0%	14.7	14.7	0.0	0.0%
724**^	44.7	28.5	-16.2	-36.2%	21.3	20.1	-1.2	-5.6%	19.2	18.7	-0.6	-2.9%
Total	312.5	346.7	34.2	10.9%	234.4	324.5	90.1	38.5%	189.0	304.9	115.9	61.3%
Total: D & 5	241.5	298.2	56.7	23.5%	198.4	289.7	91.3	46.0%	155.1	271.6	116.5	75.1%

*Existing = March 2022. **Existing = September 2019. ^Route 724 operated in March 2022 but did not serve areas south of Brooklyn Center Transit Center, including downtown Minneapolis, as it typically would; as such, September 2019 was used to represent existing conditions.

CHAPTER 3: 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.⁷

Moreover, FTA guidance recognizes the inherent overlap between Title VI and environmental justice principles, which extend protections to low-income populations. In 1994, President Clinton issued *Executive Order 12898 - Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, 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.⁸

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.”⁹

To provide direction to recipients of federal funding, FTA issued *Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients* in 2012.¹⁰ 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, including service equity analyses.

Title VI Program

Metro Transit and the Metropolitan Council’s commitment to Title VI of the Civil Rights Act of 1964 is documented in the agency’s Title VI Program, which includes policies and procedures that:

- Ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner;
- Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin; and
- Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

⁷ U.S. Department of Labor, *Title VI, Civil Rights Act of 1964*, <https://www.dol.gov/agencies/oasam/regulatory/statutes/title-vi-civil-rights-act-of-1964>.

⁸ U.S. President, Proclamation, *Executive Order 12898: Federal Actions To Address Environmental Justice in Minority Populations and Low-Income Populations*, Feb. 11, 1994, <https://www.archives.gov/files/federal-register/executive-orders/pdf/12898.pdf>.

⁹ Federal Transit Administration, *Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients*, October 1, 2012, page I-6, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf.

¹⁰ FTA, *Circular 4702.1B*.

The Title VI Program also applies to Metro Transit, is updated by the Metropolitan Council every three years, and is available online and upon request.¹¹ This report references several elements from the current Title VI Program, approved by the Metropolitan Council in January 2020.

Requirement to Conduct Service Equity Analyses

Transit providers that operate 50 or more fixed route vehicles in peak service and are located in an urbanized area of 200,000 or more in population, including Metro Transit, are required to prepare and submit a service equity analysis, prior to implementation, for any proposed major service change (as defined previously in *Major Service Change*). This analysis fulfills the requirement.

In accordance with FTA Circular 4702.1B, completion of a service equity analysis requires the incorporation of several Title VI policies, which are set by the transit provider. These include the and **“disparate impact” and “disproportionate burden” policies**, used to assess whether the effects of proposed service changes rise to the level of disparate impact on racial/ethnic minority populations and disproportionate burden on low-income populations, respectively.

Discrimination, Disparate Impact, and Disproportionate Burden

In FTA Circular 4702.1B, discrimination is defined as referring 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.¹²

Disparate impact, a key concept for understanding Title VI regulations, is defined in the Circular as:

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.¹³

Similarly, FTA defines *disproportionate burden* as:

a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations.¹⁴

Per FTA guidance, Metro Transit uses its disparate impact and disproportionate burden policy thresholds as evidence of impacts severe enough to meet the definition of disparate impact or disproportionate burden.

¹¹ Metropolitan Council, *Title VI Program*, January 2020, <https://www.metrotransit.org/Data/Sites/1/media/about/titlevi/2020%20Title%20VI%20Program%20Update.pdf>.

¹² Federal Transit Administration, *Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients*, October 1, 2012, page I-2, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf.

¹³ FTA, *Circular 4702.1B*, page I-2

¹⁴ FTA, *Circular 4702.1B*, page I-2

Metro Transit has defined its **disparate impact and disproportionate burden policies** and thresholds using the “80% rule”, which states that there may be evidence of disparate impact if:

- *Benefits* are being provided to BIPOC populations at a rate less than 80% of the benefits being provided to white populations, or
- *Adverse effects* are being borne by white populations at a rate less than 80% of the adverse effects being borne by BIPOC populations.

Metro Transit uses the same framework when evaluating whether low-income populations would experience disproportionate burden relative to the impacts on non-low-income populations.

The 80% 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.¹⁵ The 80% rule suggests that a selection rate for any racial, ethnic, or gender group that is less than 80% 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. Many transit agencies, including some of the largest in the country, use a similar framework when defining their disparate impact and disproportionate burden policies.

Metro Transit’s decision to use the 80% rule for its disparate impact and disproportionate burden thresholds was subject to a formal public outreach process before being adopted by the Metropolitan Council in 2013. Additional information about the policies and their applications can be found in the Council’s current Title VI Program.¹⁶

Policies Applied to this Proposed Service Change

The proposed package of service changes evaluated in this report would introduce the METRO D Line and increase service levels in the Route 5 corridor, resulting in an increase in the number of weekly scheduled transit trips available to the average resident.

As such, in this analysis, if the quantitative results indicate that the percent increase in the average number of weekly scheduled transit trips for BIPOC (minority) residents is less than 80% of the percent increase in the average number of weekly scheduled transit trips for white (non-minority) residents, this could be evidence of a disparate impact. In this case, additional analysis will be conducted, and potential mitigation measures will be identified, if necessary.

A major service change that results in a disparate impact may only be implemented if:

- There is a substantial legitimate justification for the proposed major service change, and
- There are no alternatives that would have a less disparate impact while still accomplishing the transit provider’s legitimate program goals.

This same framework applies for determination of disproportionate burden on low-income riders.

¹⁵ Section 60-3.4(D), *Uniform Guidelines on Employee Selection Procedure* (1978); 43 FR 38295, August 25, 1978, <https://www.ecfr.gov/current/title-41/subtitle-B/chapter-60/part-60-3>.

¹⁶ Metropolitan Council, *Title VI Program*, January 2020, <https://www.metrotransit.org/Data/Sites/1/media/about/titlevi/2020%20Title%20VI%20Program%20Update.pdf>.

Title VI Definitions of Minority and Low-Income Populations

Racial and Ethnic Minorities

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.¹⁷ However, as part of efforts to use respectful and inclusive language, Metro Transit and the Metropolitan Council prefer to use the term Black, Indigenous, and People of Color (BIPOC), or communities of color, rather than “minority” when referring to people who identify as one or more of the above racial or ethnic groups. As such, references to BIPOC or communities of color in this report should be interpreted to mean the same thing as “minority”.

For the purposes of this evaluation, “non-minority” or “non-BIPOC” persons are defined as those who self-identify as non-Hispanic white (“white”). All other persons, including those identifying as two or more races and/or ethnicities, are defined as BIPOC (equivalent to “minority”).

FTA requires transit providers to evaluate service using this dichotomy between “minority” and “non-minority” populations. However, focusing on the global “minority” or BIPOC category (versus using disaggregated race and ethnicity data) obscures the racial and ethnic diversity of the many identities within it, treating BIPOC residents as interchangeable. To remedy this, Metro Transit and the Metropolitan Council are now using and providing more detail on race and ethnicity in their evaluations and data products. For example, as part of regular monitoring of route and system-wide performance (outside of the realm of Title VI), Metro Transit disaggregates transit performance by race and ethnicity for more power and knowledge by community.

Low-Income Population

While low-income populations are not an explicitly protected class under Title VI, FTA recognizes the inherent overlap between the principles of Title VI and environmental justice. Consequently, FTA encourages required transit providers to conduct service equity analyses with regard of low-income populations in addition to minority populations, and to identify any disproportionate burden placed on low-income populations.

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 family/household size. 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 Title VI service monitoring analysis uses 185% of the 2020 U.S. Census Bureau poverty thresholds to determine low-income status. U.S. Census Bureau poverty thresholds use a more sophisticated measure of poverty that considers not only family/household size, but also the number of related children present, and, for one- and two-person family units, whether one is elderly

¹⁷ More specifically, Title VI *Circular 4702.1B* (page I-4) defines minority persons as including the following identities: (1) 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; (2) 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; (3) Black or African American, which refers to people having origins in any of the Black racial groups of Africa; (4) Hispanic or Latino, which includes people of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race; and (5) 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.

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.¹⁸

The Metropolitan Council uses 185% of poverty thresholds to define poverty in its place-based equity research, regional policies, and other initiatives, and this Title VI analysis mirrors that approach.¹⁹

Table 4 lists 185% of the 2020 U.S. Census Bureau poverty thresholds that are used in this analysis.

Table 4. 2020 U.S. Census Bureau poverty thresholds (185%) in dollars

By Size of Family Unit and Number of Related Children Under 18 Years of Age

Size of Family Unit	Weighted Average Poverty Thresholds (\$)	None	One	Two	Three	Four	Five	Six	Seven	Eight or more
One Person (Unrelated Individual)	24,366									
Under 65 Years	24,910	24,909								
65 Years & Over	22,964	22,963								
Two People	30,956									
Householder Under 65 Years	32,214	32,062	33,002							
Householder 65 Years & Over	28,969	28,941	32,877							
Three People	38,093	37,452	38,539	38,576						
Four People	49,018	49,385	50,193	48,556	48,725					
Five People	58,121	59,556	60,423	58,572	57,140	56,266				
Six People	65,673	68,501	68,772	67,355	65,997	63,977	62,780			
Seven People	74,751	78,818	79,310	77,614	76,432	74,229	71,658	68,839		
Eight People	82,797	88,152	88,931	87,330	85,927	83,937	81,411	78,782	78,113	
Nine People or More	99,724	106,041	106,555	105,138	103,948	101,995	99,307	96,876	96,274	92,566

Source: U.S. Census Bureau; 100% of the 2020 poverty thresholds are available at <https://www.census.gov/data/tables/time-series/demo/income-poverty/historical-poverty-thresholds.html>.

¹⁸ The distinctions between poverty thresholds and guidelines are described further at <https://aspe.hhs.gov/frequently-asked-questions-related-poverty-guidelines-and-poverty>.

¹⁹ The use of 185% poverty thresholds differs from some previous service equity analyses, which used the 100% thresholds. The decision to use 185% thresholds was a result of a recent internal review of Metro Transit and the Council’s Title VI service equity analysis practices, and research on those used by other agencies nationwide. The review found that half of the 26 transit agencies reviewed used a definition of “low income” that was more inclusive than the standard definition (100%) suggested by FTA in *Circular 4702.1B*. FTA allows agencies to set their own, more tailored definitions of what constitutes “low income,” as long as they are at least as inclusive.

CHAPTER 4: ANALYSIS METHODOLOGY

A geographic information systems (GIS)-based approach was used in this analysis to measure the location and magnitude of service changes and compare the distribution of impacts (positive or negative) to BIPOC, white (non-BIPOC), low-income, and non-low-income populations based on where they live. The analysis consists of five steps:

1. Model existing/baseline and proposed service levels (scheduled weekly transit trips).
2. Allocate current and proposed transit service levels to population groups based on the spatial relationship between census blocks and transit service “walksheds” (e.g., quarter mile/5-minute walk or roll from a bus stop) based on the street network.
3. Calculate the percent change in service between the existing/baseline and proposed service levels for each census block served in either time period.
4. Calculate the population-weighted average percent change in service for all population groups within the area served by transit in either time period.
5. Determine whether the proposed service will result in a potential disparate impact or disproportionate burden by applying Metro Transit’s disparate impact and disproportionate burden policies.

This analysis used the number of scheduled 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 scheduled 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 service levels from which to calculate changes – an existing/baseline network and a proposed network. With one exception, this analysis considered only the routes impacted by the proposed service changes: D Line and Routes 5, 39, 133, 721, and 724.²⁰

The existing/baseline service level network represents the conditions as of March 2022 or September 2019, depending on which was more representative of established “typical” service. March 2022 was used as the baseline for routes currently operating service levels and alignments that are typical; this applies to Routes 5 and 721, which by March 2022 had essentially returned to pre-COVID operations. September 2019 was used as the baseline for Routes 39 and 133, which are not currently operating; and for Route 724, which is currently operating, but not south of BCTC as it would pre-COVID.

²⁰ While no changes are proposed, this analysis included in the proposed and existing/baseline networks service from Route 553 that would typically operate within a portion of the D Line / Route 5 corridor. Route 553 is currently suspended and would remain suspended when the D Line opens. Route 553 is a weekday-only Commuter & Express route connecting south Minneapolis to downtown Minneapolis and DeLaSalle High School just north of downtown. It operates as local service south of Diamond Lake Road via Portland Avenue in the D Line corridor, with its southern terminal outside the corridor along Old Shakopee Road in Bloomington. This analysis included service from Route 552 that would typically operate within the D Line corridor – along Portland Avenue from Diamond Lake Road to American Boulevard.

The proposed service level network represents the conditions after the proposed D Line and Route 5 service changes are implemented concurrently in December 2022, with some exceptions to reflect long-term conditions.²¹

Assigning Transit Trips to Census Blocks

The number of weekly scheduled transit trips at each stop or station was assigned to census blocks as a means of quantifying the amount of transit service available in a given area. A bus stop was assumed to serve a census block (and its population) if the geographic center of the census block was within a 5-minute walk (about a quarter mile) of the stop. Alternatively, a D Line BRT station was assumed to serve a census block (and its population) if the geographic center of the census block was within a 10-minute walk (about a half mile) of the stop. These time-based “walksheds” were created using the existing street network to better reflect where people can actually walk or roll (i.e., reflecting real-world barriers such as water features, interstates, etc.)

Measuring transit service at the stop/station level assigns service only to areas near where a transit vehicle may pick up and drop off passengers, disregarding non-stop route segments.

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 people living in census blocks. 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. Block-level data are often preferred over that reported at larger geographies (i.e., block group or tract) because their smaller size increases the potential level of precision of analysis.

In this analysis, BIPOC, white, low-income, and non-low-income populations were estimated at the census block level by applying data extrapolation techniques to the 2016-2020 American Community Survey (ACS) 5-year Estimates and 2020 Decennial Census datasets. The methods and assumptions used to calculate block-level estimates are described in greater detail in *Appendix A: Additional Methodology Details*.

Calculating Change in Service Level by Census Block

The absolute change in service – or the impact of the proposed major service change – was calculated for each served census block by subtracting the existing/baseline number of weekly scheduled trips available from the proposed number of weekly scheduled trips available. Next, for each census block, the percent change in service was calculated by dividing the absolute change in weekly scheduled trips by the existing/baseline number of weekly scheduled trips. To minimize artificial skewing, all changes greater than 100%, including those that are incalculable due to no existing or proposed service, were adjusted to a maximum absolute value of 100%.

²¹ In this analysis, the proposed network reflects the long-term operations of the D Line and Route 5. This includes service to the Osseo & 47th Avenue D Line station, which will be the new northern terminal of modified Route 5. In reality, these changes will be implemented after Hennepin County has finished construction along Osseo Road, which is scheduled to start in Spring 2023.

Determining Average Percent Change in Service

As described in the Metropolitan Council and Metro Transit’s Title VI Program, major service changes are assessed cumulatively, or as a package of changes. The average percent change in service for each target population (i.e., BIPOC, white, low-income, and non-low-income) was calculated by weighting the percent change in service for each census block by the target population served in that census block. For example, the average percent change in service for BIPOC populations was completed by multiplying each census block’s BIPOC population by the percent change in service for that block, summing the results for all blocks, and dividing that sum by the total BIPOC population for all blocks served in either the current or proposed scenario. The formula used for these analyses is shown in Figure 2.

$$\text{Average \% Change} = \frac{\sum (\text{Target Population}_i \times \text{Percent Change}_i)}{\sum \text{Target Population}_i}$$

Where

Figure 2. Formula for determining average percent change in service

Target 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, BIPOC population, white 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.

CHAPTER 5: EVALUATION OF IMPACTS

Affected Population

Figure 3 and Figure 4, respectively, show the distribution of BIPOC and white residents and low-income and non-low-income residents, by census block, within the area served by the D Line and/or Routes 5, 39, 133, 721, and 724 in either scenario: existing/baseline or proposed (December 2022). The service equity analysis is based on the impact to these residents. Areas with zero population are excluded from the figure and analysis.

Figure 3. Distribution of BIPOC and white populations

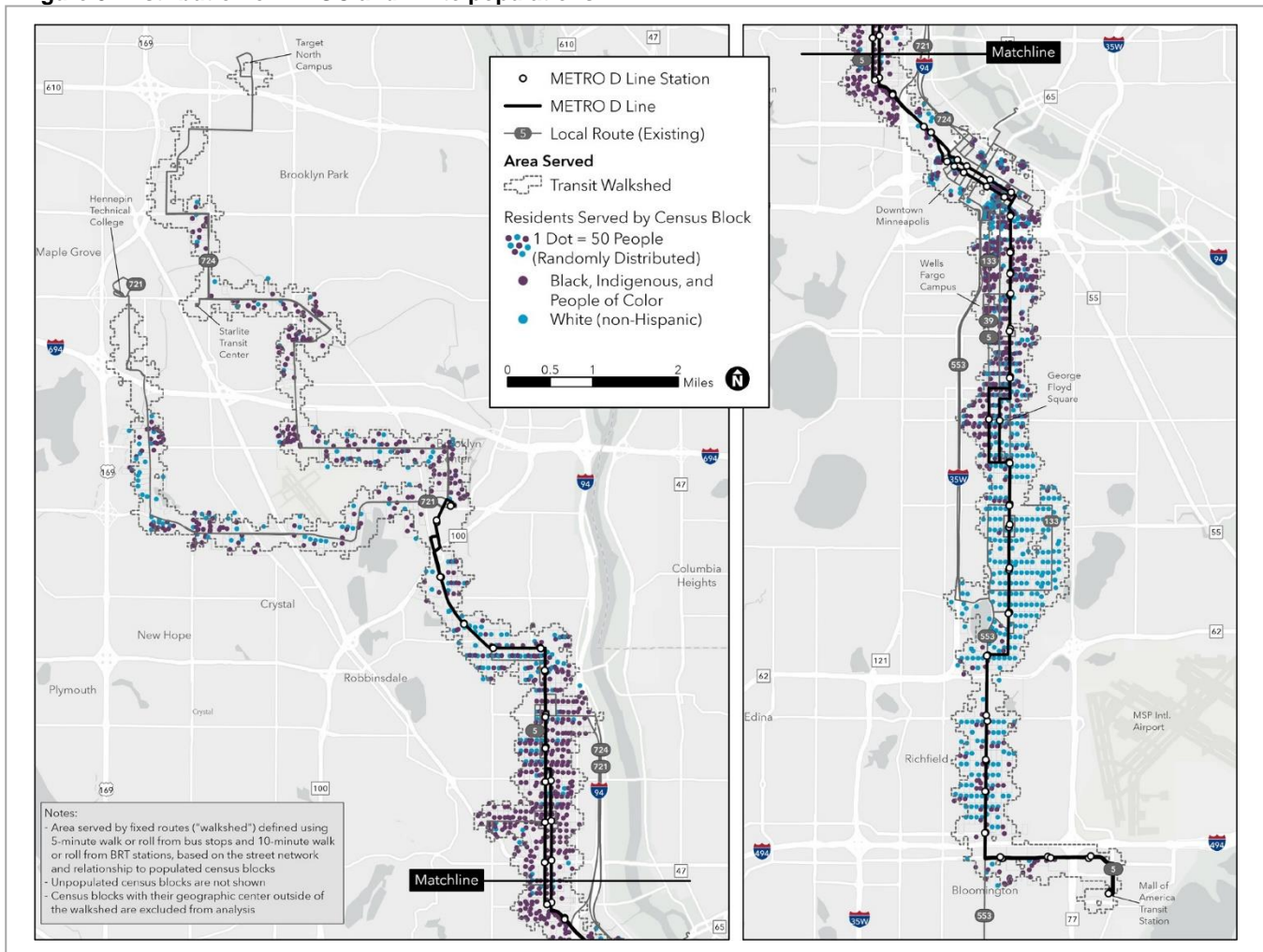
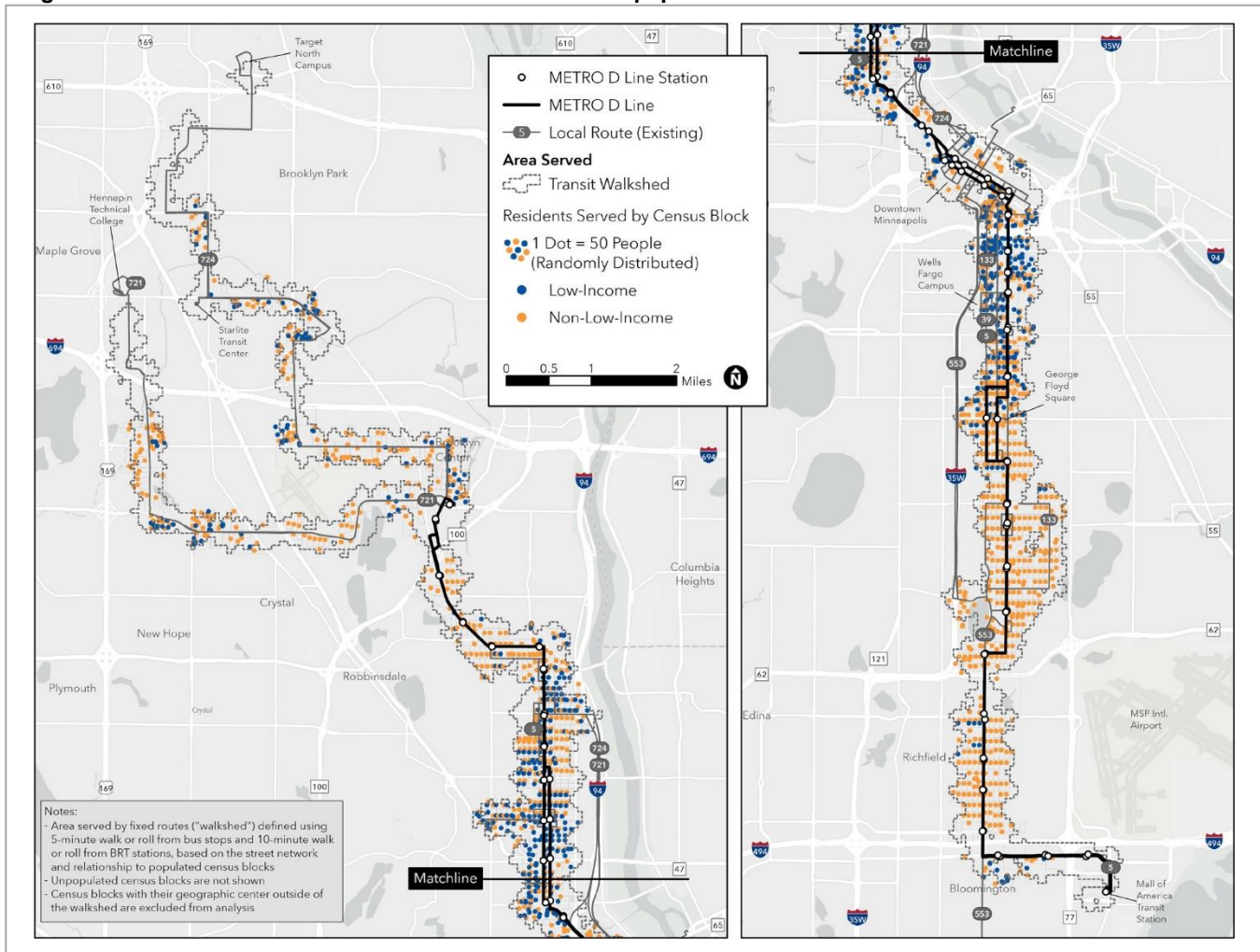


Figure 4. Distribution of low-income and non-low-income populations



Percent Change in Service by Census Block

The percent change in transit service level, as measured by weekly scheduled transit trips, by census block, is shown in Figure 5. Areas with zero population are excluded from the figure. A large majority of census blocks, and population, within the service change area would receive an increase in service.

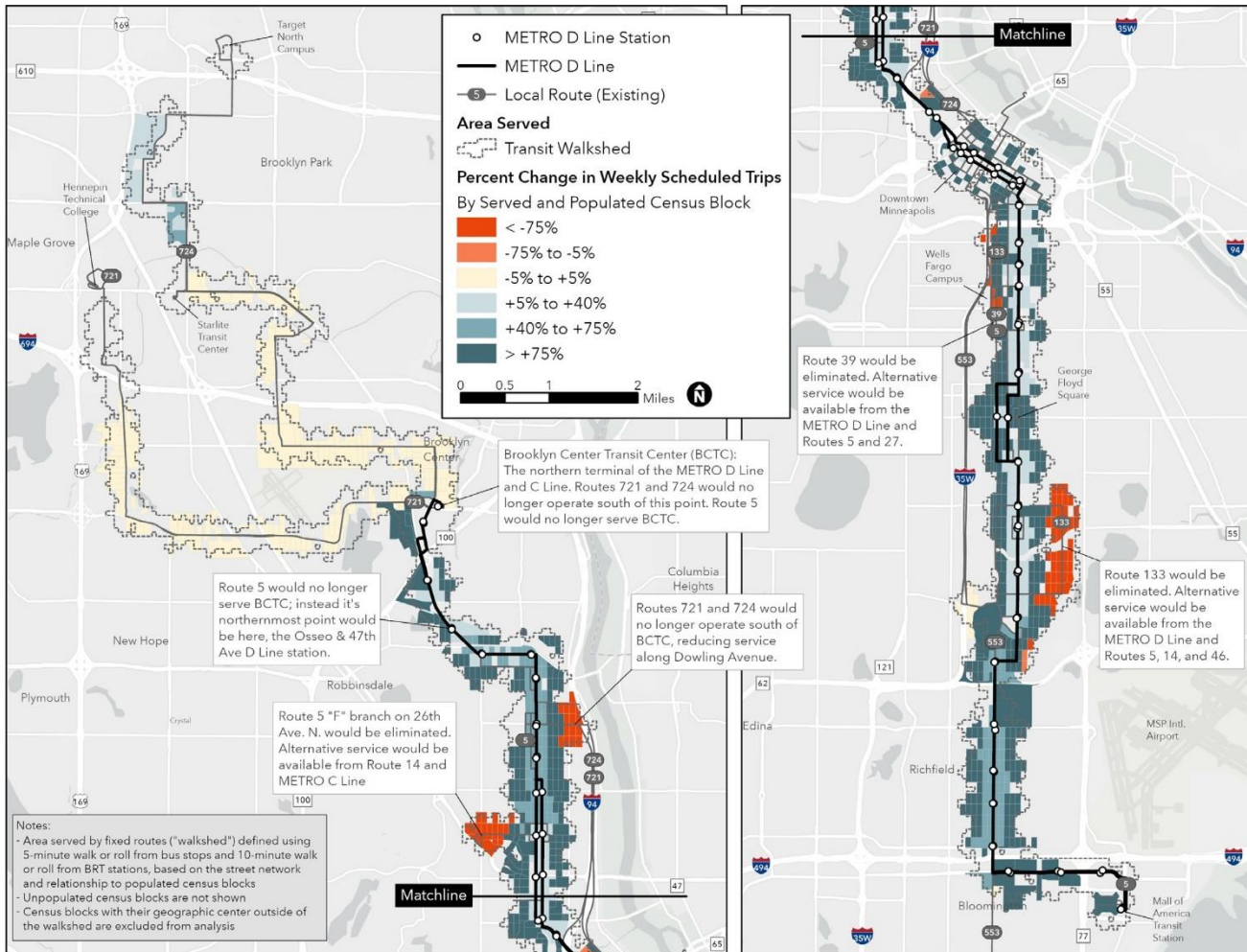
- 76% of the total population living within the service change area would receive an increase in weekly scheduled transit trips;
- 53% of residents would receive an increase in weekly scheduled transit trips greater than 50%; and

Very few areas would receive reduced service as a result of the proposed D Line, Route 5, and associated service changes. Just 7% of residents would receive a decrease in weekly scheduled transit trips greater than 5%. Areas that would see their transit service decrease greater than 5% are limited, including:

- Dowling Avenue between Aldrich Avenue and I-94 in north Minneapolis due to Routes 721 and 724 no longer operating south of BCTC (alternative service available from Routes 22 and 32, and from the D Line at Fremont & Dowling station) ;

- 26th Avenue near Penn Avenue in north Minneapolis, due to the F branch of Route 5 being eliminated (alternative service available from the METRO C Line and Route 14);
- West of Portland Avenue between 26th and 28th streets (area largely defined by the Wells Fargo campus) in south Minneapolis due to elimination of Route 39 (alternative service available from Routes 5 and 27, and the D Line at Chicago and 26th Street station); and
- Bloomington Avenue between 44th and 54th streets in south Minneapolis due to elimination of Route 133 (alternative service available from Routes 5, 14, and 46, and the D Line at stations along Chicago Avenue at 46th, 48th, 52nd, and 56th streets).

Figure 5. Percent change in service by census block



Average Percent Change in Service by Population Group

Table 5 summarizes the average percent change in service level for each target population group. On average, the proposed service changes associated with introduction of the D Line result in a notable increase in transit service availability for all population groups within the service change area.

The average person living in the service change area – regardless of race, ethnicity, or low-income status – would experience a 52.2% increase in transit service after the proposed changes. The average

BIPOC resident would experience a 52.8% increase, greater than the average for white resident, who would experience a 51.2% increase (Table 5). Therefore, per Metro Transit’s Title VI policies, this analysis identifies **no disparate impact on BIPOC residents** resulting from the proposed service changes as part of implementing the METRO D Line.

Table 5. Average percent change in service

Population Group	Average Percent Change in Service	Affected Population
Black, Indigenous, and People of Color	52.8%	59,866
White non-Hispanic	51.2%	37,933
Disparate Impact Comparison Index¹	1.03 > 0.80, thus, no disparate impact	--
Low-Income	56.0%	35,983
Non-Low-Income	49.3%	61,339
Disproportionate Burden Comparison Index²	1.13 > 0.80, thus, no disproportionate burden	--
Total Population	52.2%	97,799

¹ 1.03 = 52.8% / 51.2%

² 1.13 = 56.0% / 49.3%

The average low-income resident in the service change area would experience a 56.0% increase in transit service after the proposed changes (Table 5). This service increase is greater than that for the average for non-low-income individual, who would receive a 49.3% increase. Therefore, per Metro Transit’s Title VI policies, this analysis identifies **no disproportionate burden on low-income residents** resulting from the proposed service changes as part of implementing the METRO D Line.

CHAPTER 6: CONCLUSIONS

Recipients of federal funding 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. Metro Transit and the Metropolitan Council are preparing to introduce the METRO D Line in December 2022, alongside proposed service changes to connecting Routes 5, 39, 133, 721, and 724.

This analysis reviewed the percent change in weekly scheduled transit trips resulting from the proposed service changes. Results indicate that three out of four affected residents would receive an increase in service – and half would receive a 50% or greater increase in service. Just 7% of affected residents would experience a decrease in service greater than 5%.

On average, BIPOC residents would benefit more than white residents (52.6% increase vs. 50.6%), and low-income residents would benefit more than non-low-income residents (55.7% vs, 48.9%) [Table 5].

Upon conducting the technical analysis and applying Metro Transit's Title VI policies in accordance with Metro Transit and the Metropolitan Council's Title VI Program, this analysis finds that the **proposed service changes would not result in disparate impact on BIPOC populations nor disproportionate burden on low-income populations.**

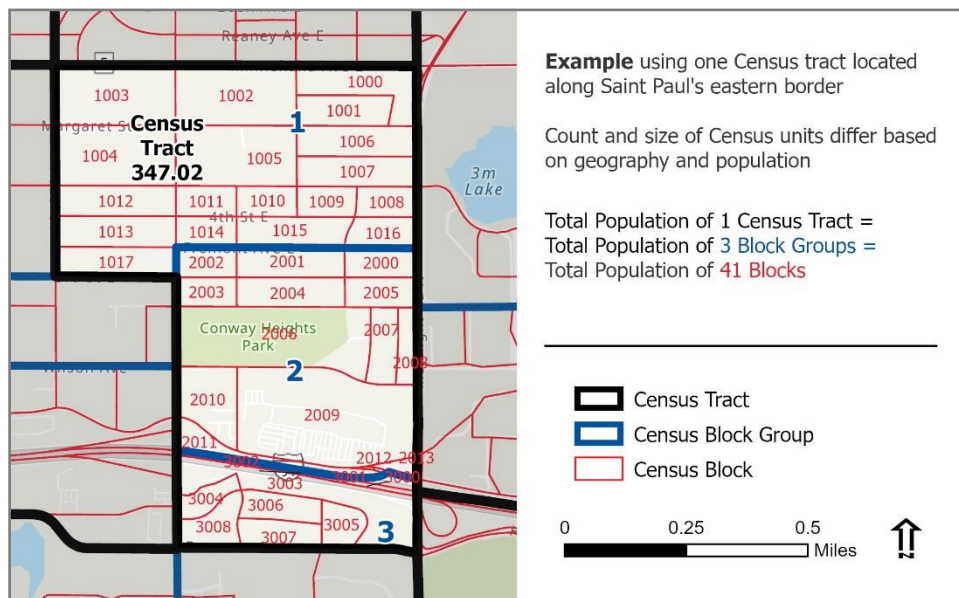
APPENDIX A: ADDITIONAL METHODOLOGY DETAILS

Extrapolating Census Data

Information on race and ethnicity is available at the census block level from the U.S. Census Bureau's Decennial Censuses, the latest being 2020. However, the Bureau's decennial censuses do not contain information on income and poverty, which FTA requires for identifying low-income populations. Rather, the U.S. Census Bureau's 2016-2020 American Community Survey (ACS) 5-year Estimates was the most recent dataset available at the time of analysis that contained poverty status, and are used in this analysis.²² Unfortunately, the ACS dataset is available only down to the census block group level; However, given the common time periods and geography of these two datasets, it is possible to extrapolate income and poverty data reported at the block group level to census block level estimates.

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; decennial censuses are among the few demographic datasets published by the Census Bureau that are available at the census block level. The larger census block group is made up of a cluster of nested census blocks (Figure 6); data reported at the census block group level is common among the Census Bureau's public dataset offerings. It can be more difficult to identify location-specific impacts using only census block group data, due to their larger size. Alternatively, block-level data are often preferred because their smaller size increases the potential level of precision of analysis.

Figure 6. Census Small Area Geography Relationships



Illustrated using one Census Tract in east Saint Paul

²² The 2016-2020 ACS dataset contains estimates that are based on the most recent five years of data collected by the U.S. Census Bureau (2016 through 2020). As a collection of estimates, the 2016-2020 ACS data are subject to error, but remain the most reliable and current demographic data required to complete the analysis that are readily available for the service area.

To provide more spatial granularity and detail to the analysis, BIPOC, white, low-income, and non-low-income populations were estimated at the census block level by applying data extrapolation techniques to the 2016-2020 ACS and 2020 Decennial Census datasets.²³ Due to limitations of census data availability, and because the boundaries of individual census blocks and block groups do not change between decennial censuses, the following assumption was used to estimate low-income populations for census blocks:

Parent block group low-income population is distributed among its nested blocks in a manner identical to the total population.

While this approach relies on significant assumptions, it allows for a more precise analysis than using the larger block groups. Importantly, this approach also allows for the identification of zero-population areas within each block group and incorporates the latest published data to partially reflect changes in population over time.

²³ This analysis incorporated 2020 Decennial Census data because it shared common geography with the 2016-2020 ACS data, which were developed as part of the 2020 Decennial Census (i.e., the boundaries of blocks, etc. may differ with each decennial census).

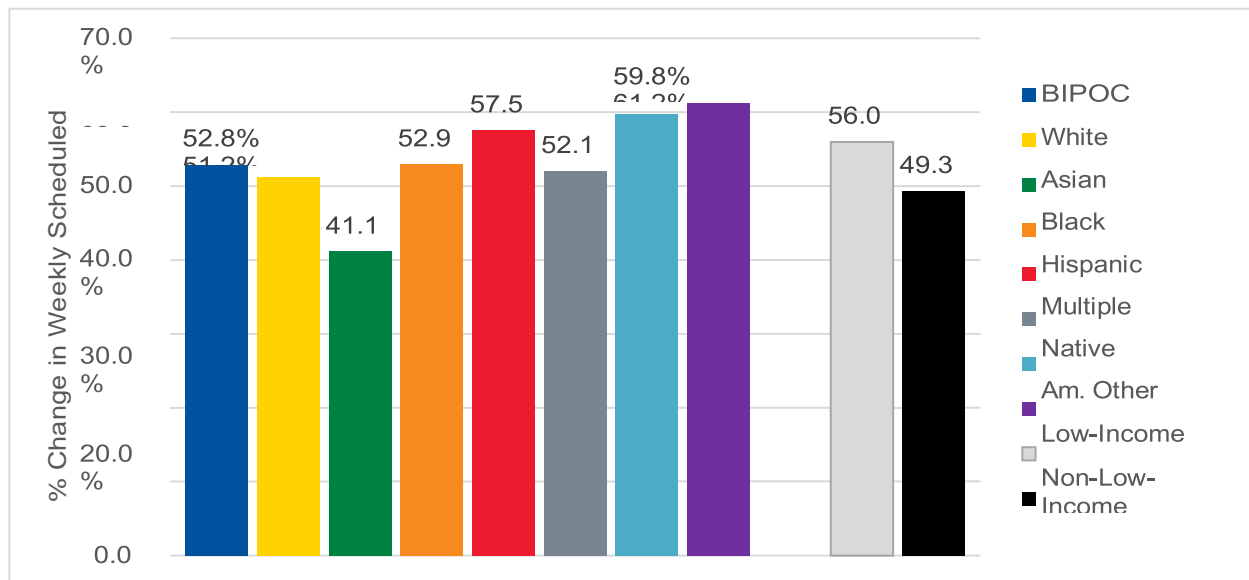
APPENDIX B: ADDITIONAL CHANGE DETAILS

Table 6. Proposed Change in Annual In-Service Hours by Route by Service Day

Route	Wk.	Sat.	Sun.
D Line	11,460.8	11,502.4	10,706.8
5	-8,980.4	-6,739.2	-4,555.2
39	-160.2	0.0	0.0
133	-317.2	0.0	0.0
552	0.0	0.0	0.0
553	0.0	0.0	0.0
721	-304.2	-93.6	-93.6
724	-97.0	-33.3	0.0
Total	1,601.8	4,636.3	6,058
Total: D & 5	2,480.4	4,763.2	6,151.6

Figure 7 displays the average percent change in service for BIPOC, white, low-income, and non-low-income residents alongside more detailed racial/ethnic identities.

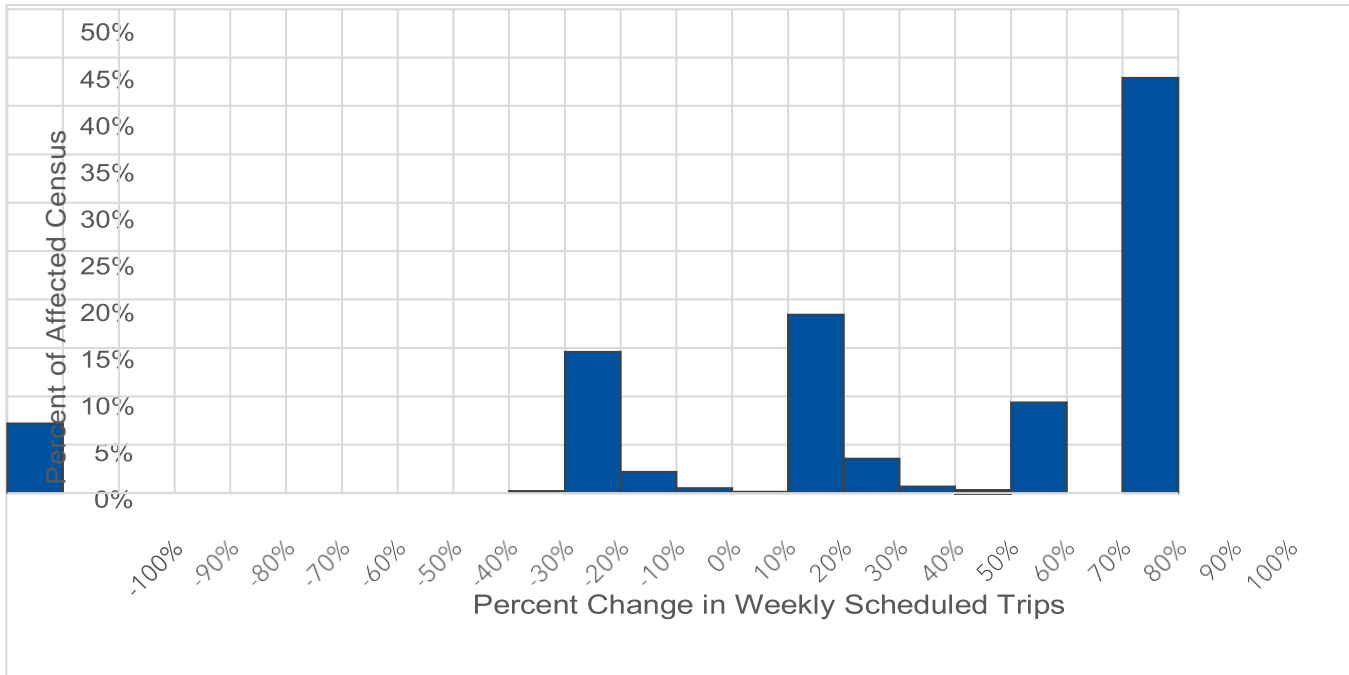
Figure 7. Average percent change in service by detailed population group



The proposed service changes affect approximately 1,400 census blocks; these blocks contain transit service in the existing/baseline network and/or proposed network. Of the affected blocks, 78% would

receive an increase in the number of weekly scheduled transit trips compared to existing/baseline conditions. These blocks with a service increase are where 76% of the affected population live. Figure 8 shows the distribution of affected census blocks by percent change in weekly scheduled trips.

Figure 8. Affected census blocks by percent change in service



Title VI Fare Equity Analysis

2022 Fare Simplification

June 10, 2022

Note:

Approval of the June 2022 Fare Simplification Fare Equity Analysis has not yet occurred due to the potential for further analysis to be done.



Prepared by:



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.

Metro Transit

Metro Transit is the largest transportation resource for the Twin Cities, offering an integrated network of buses, light rail, and commuter trains, as well as resources for those who carpool, vanpool, walk, or bike. Metro Transit is an operating division of the Metropolitan Council.

Other Regional Transit Providers

Along with the services provided through the Metropolitan Council, several other providers operate transit service in the region, including Minnesota Valley Transit Authority (MVTA), SouthWest Transit, Maple Grove Transit, Plymouth Metrolink, and the University of Minnesota. The size, geographic service area, and service types of these providers vary, but the [Metropolitan Council works with](#) each provider to ensure the transit system is integrated in addressing the region's needs.

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EXECUTIVE SUMMARY

Metro Transit and the Metropolitan Council, in coordination with other regional transit providers, are proposing a package of fare changes that would simplify the regional fare structure and decrease fares slightly for the average rider of the regional regular-route transit system. The following proposed fare changes align with the Metropolitan Council’s fare policy goals of balancing equity, fare simplification, and revenue generation. If approved, these changes would apply to nearly all regular-route service in the regional transit system.¹

The Federal Transit Administration (FTA) requires recipients of federal funding, including Metro Transit, to ensure communities of color and people with lower incomes do not experience discrimination in access to transit service. This FTA requirement stems from Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance; and President Clinton’s *Executive Order 12898 - Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* (1994), which directed federal agencies to consider impacts to low-income populations as well. As part of this effort, FTA requires transit providers such as Metro Transit to conduct a Title VI fare equity analysis, prior to implementation, for any proposed fare change, regardless of the amount of increase or decrease. This analysis fulfills this requirement as it relates to potential fare changes proposed as part of simplification efforts.

Proposed Fare Simplification

The proposed fare changes are part of ongoing efforts to simplify the regional fare system. Doing so will increase ridership by making the regional regular-route transit system easier to understand and more convenient to use for both existing and potential riders. Toward this effort, Metro Transit is analyzing three fare change scenarios, summarized in Tables i and ii below. One scenario would be considered for approval by the Metropolitan Council.

Table i. Proposed Fare Changes by Change Scenario

Change Description	Scenario 1	Scenario 2	Scenario 3
Eliminate the Rush-Hour [^] surcharge for Reduced Fare * riders, resulting in a \$1.00 fare at all times of day on both Local Bus / METRO and Express Bus service types	Included	Included	Included
Eliminate the Rush-Hour surcharge for the Adult ** fare type on Local Bus / METRO service, resulting in a \$2.00 fare at all times of day on applicable routes	Included	Not Included	Not Included
Eliminate the Rush-Hour surcharge for the Adult fare type, resulting in a \$2.00 fare at all times of day on Local Bus / METRO service and a \$3.00 fare at all times of day on Express Bus service	Not Included	Included	Not Included

*Youth (ages 6-12), Seniors (ages 65+), and Medicare card holders; **Ages 13-64; ^ Monday – Friday, 6-9 am and 3-6:30 pm

¹ Fares for Metro Transit’s Northstar Commuter Rail line would not be impacted by the proposed changes, as they are part of a separate distance-based fare structure in which the fare varies by boarding station. The proposed fare changes would not impact fares for Metro Mobility or Transit Link, the region’s public shared ride demand response services overseen by the Metropolitan Council.

Table ii. Existing and Proposed Fares, Scenarios 1, 2, and 3

Fare Type	Service Type	Time of Day^	Existing Fare	Proposed Fare	Absolute Change	Percent Change	Applicable Scenario(s)
Adult*	Local Bus / METRO	Non-Rush Hour	\$2.00	\$2.00	--	--	--
Adult*	Local Bus / METRO	Rush Hour	\$2.50	\$2.00	-\$0.50	-20.0%	1
Adult*	Express Bus	Non-Rush Hour	\$2.50	\$2.50	+\$0.50	+20.0%	2
Adult*	Express Bus	Rush Hour	\$3.25	\$3.25	-\$0.25	-7.7%	2
Reduced Fare**	Local Bus / METRO	Non-Rush Hour	\$1.00	\$1.00	--	--	--
Reduced Fare**	Local Bus / METRO	Rush Hour	\$2.50	\$1.00	-\$1.50	-60.0%	1, 2, 3
Reduced Fare**	Express Bus	Non-Rush Hour	\$1.00	\$1.00	--	--	--
Reduced Fare**	Express Bus	Rush Hour	\$3.25	\$1.00	-\$2.25	-69.2%	1, 2, 3
Mobility Fare	All	All	\$1.00	\$1.00	--	--	--
Downtown Zone	All	All	\$0.50	\$0.50	--	--	--
Downtown Zone: Nicollet Mall	All	All	\$0.00	\$0.00	--	--	--
Transit Assistance Program (TAP)	All	All	\$1.00	\$1.00	--	--	--

Framework for Evaluating Impacts

The purpose of this report is to evaluate potential fare changes to ensure the impacts of those changes would be made in a nondiscriminatory manner on the basis of race, color, national origin, and low-income status. Specifically, this analysis reviewed the extent to which the change in average fare differs between Black, Indigenous, or people of color (BIPOC) riders and white non-Hispanic riders, and between low-income riders and non-low-income riders. The results will help determine whether there would be disparate impact on the basis of race, color, national origin, or disproportionate burden on low-income riders.

For Title VI fare equity analyses, FTA requires that Metro Transit use its **disparate impact and disproportionate burden policies and thresholds as evidence of impacts severe enough to result in potential discrimination**. As outlined in the Metropolitan Council’s Title VI Program, Metro Transit has defined its disparate impact and disproportionate burden policies and thresholds using the “80% rule,” which states that there may be evidence of disparate impact if:

- Benefits are being provided to BIPOC populations at a rate less than 80% of the benefits being provided to white populations, or
- Adverse effects are being borne by white populations at a rate less than 80% of the adverse effects being borne by BIPOC populations.

Metro Transit uses the same framework when evaluating whether low-income populations would experience disproportionate burden relative to the impacts on non-low-income populations.

Summary of Results from all Scenarios

Table iii summarizes the average percent change in fare for each population group as well as the comparison index - used for determining disparate impact and disproportionate burden - under each fare change scenario.

- On average, all scenarios result in fare decreases for all demographic rider groups.
- In all three scenarios, the average fare decrease would be small, ranging from 0.24% to 4.96%.
- In Scenario 1, BIPOC riders and low-income riders would experience a similar fare decrease as white riders and non-low-income riders.
- In Scenario 2, BIPOC riders and low-income riders would experience 37% to 43% greater fare decrease than white riders and non-low-income riders, respectively.
- Neither Scenario 1 nor 2 show potential for disparate impact on BIPOC riders or disproportionate burdens on low-income riders.
- Scenario 3 does show potential for disparate impact on BIPOC riders.
- While it does not rise to the level of disproportionate burden, low-income riders would receive 17% less benefit than non-low-income riders, on average, in Scenario 3.

Table iii. Results by Rider Group, Scenarios 1, 2, and 3

Scenario	Measure	Minority Riders	Non-Minority Riders	Low-Income Riders	Non-Low-Income Riders
1	Percent Change in Average Fare	-4.96%	-4.70%	-4.65%	-4.80%
1	Comparison Index*	1.05	--	0.97	--
1	Disparate Impact / Disproportionate Burden?	No	--	No	--
2	Percent Change	-4.30%	-3.13%	-4.33%	-3.03%
2	Comparison Index*	1.37	--	1.43	--
2	Disparate Impact / Disproportionate Burden?	No	--	No	--
3	Percent Change	-0.241%	-0.680%	-0.419%	-0.507%
3	Comparison Index*	0.35	--	0.83	--
3	Disparate Impact / Disproportionate Burden?	Yes	--	No	--

*Example: $-4.65\% / -4.80\% = 0.97$

Note: Any apparent errors in the change or difference values are due to rounding.

Conclusions

Upon conducting the technical analysis and applying Metro Transit's Title VI policies in accordance with the Metropolitan Council's Title VI Program, this review finds that proposed fare changes under **Scenarios 1 and 2 do not result in disparate impact on BIPOC riders nor disproportionate burden on low-income riders**. However, results for proposed fare changes under Scenario 3 are mixed: they would not result in disproportionate burden on low-income riders but do have **potential for disparate impact on BIPOC riders**. In coordination with other regional transit providers, Metro Transit and Metropolitan Council leadership will consider the findings of this fare equity analysis before

determining next steps, including whether or not to pursue one of the proposed fare change scenarios.

CHAPTER 1: INTRODUCTION

Metro Transit and the Metropolitan Council, in coordination with other regional transit providers, are proposing a package of fare changes that would simplify the regional fare structure and decrease fares slightly for the average rider of the regional regular-route transit system. The following proposed fare changes align with the Metropolitan Council’s fare policy goals of balancing equity, fare simplification, and revenue generation. If approved, these changes would apply to nearly all regular-route service in the regional transit system.

The Metropolitan Council pledges that the public will have access to all its programs, services, and benefits without regard to race, color, or national origin, in accordance with Title VI of the Civil Rights Act of 1964. This pledge applies to Metro Transit, an operating division of the Metropolitan Council.

Report Purpose

The purpose of this report is to evaluate potential fare changes proposed by Metro Transit and the Metropolitan Council to ensure the impacts of those changes would be made in a nondiscriminatory manner on the basis of race, color, national origin, and low-income status. Specifically, this analysis reviewed the extent to which the change in average fare differs between Black, Indigenous, or people of color (BIPOC) riders and white non-Hispanic riders, and between low-income riders and non-low-income riders. The results will help determine whether there would be disparate impact on the basis of race, color, national origin, or disproportionate burden on low-income riders.

Proposed Fare Simplification

Metro Transit is analyzing three fare change scenarios, summarized in Table 1 and described throughout this report. One scenario would be considered for approval by the Metropolitan Council.

Table 1. Proposed Fare Changes by Change Scenario

Change Description	Scenario 1	Scenario 2	Scenario 3
Eliminate the Rush-Hour [^] surcharge for Reduced Fare * riders, resulting in a \$1.00 fare at all times of day on both Local Bus / METRO and Express Bus service types	Included	Included	Included
Eliminate the Rush-Hour surcharge for the Adult ** fare type on Local Bus / METRO service, resulting in a \$2.00 fare at all times of day on applicable routes	Included	Not Included	Not Included
Eliminate the Rush-Hour surcharge for the Adult fare type, resulting in a \$2.00 fare at all times of day on Local Bus / METRO service and a \$3.00 fare at all times of day on Express Bus service	Not Included	Included	Not Included

*Youth (ages 6-12), Seniors (ages 65+), and Medicare card holders

**Ages 13-64

[^] Monday – Friday, 6-9 am and 3-6:30 pm

Fares for Metro Transit’s Northstar Commuter Rail line would not be impacted by the proposed changes, as they are part of a separate distance-based fare structure in which the fare varies by

boarding station. The proposed fare changes would not impact fares for Metro Mobility or Transit Link, the region's public shared ride demand response services overseen by the Metropolitan Council.

None of the three change scenarios include proposed changes in the locations where fares are distributed or sold, nor would they introduce any new fare types or payment methods. Thus, this analysis does not include an evaluation of rider access to certain fare combinations.

Goals

The Metropolitan Council's fare policy goals include balancing equity, fare simplification, and revenue generation. The proposed fare changes reflect ongoing efforts to simplify the regional fare system. Doing so will increase ridership by making the regional regular-route transit system easier to understand and more convenient to use for both existing and potential riders. Additionally, the proposed fare changes would result in a fare decrease for the average rider, and Metro Transit and the Metropolitan Council view this as another means of increasing ridership.

Findings from federal research and transit advocacy organizations support the justification for fare simplification. According to a recent report from TransitCenter, a foundation that works to improve public transit in cities across the U.S.:

Complicated fare structures make transit confusing, and when transit is confusing fewer people ride... Many American transit agencies are now working to reduce fare structure complexity and to communicate pricing to riders with greater clarity.²

For example, King County Metro in the Seattle region – one of Metro Transit's primary peer transit agencies located in a peer region – eliminated the classification of fares by time of day in 2017, similar to the strategy in each of the three proposed fare change scenarios. Further, as stated in a federally-funded research report summarizing fare policies, structures, and technologies:

The transit industry continues to favor simplified fare structures. Even with the availability of electronic payment options, most agencies continue to utilize flat fare structures (i.e., with no fare zones or peak/off-peak differentials). The percentages of agencies using fare differentials has actually declined in recent years, as several agencies have reduced the complexity of their fare structures.³

Even as fare *collection* systems become increasingly complex with greater reliance on mobile and account-based technologies, transit agencies in the U.S. continue to pursue strategies to make public-facing fare *structures* simpler and make riding transit easier.⁴

Regional Fare Structure

Along with the services provided through the Metropolitan Council, several other providers operate transit service in the region, including Minnesota Valley Transit Authority (MVTA), SouthWest Transit,

² TransitCenter. A Fare Framework: How transit agencies can set fare policy based on strategic goals. October 2019. Page 12. Available at <https://transitcenter.org/wp-content/uploads/2019/10/FareFramework-1.pdf>.

³ Transportation Research Board. TCRP Report 94: Fare Policies, Structures and Technologies: Update. 2003. Page 2. Available at <https://www.trb.org/Publications/Blurbs/153102.aspx>.

⁴ Transportation Research Board. TCRP Synthesis 160: Fare Capping: Balancing Revenue and Equity Impacts. 2020. Available at <https://www.trb.org/Main/Blurbs/182679.aspx>.

Maple Grove Transit, Plymouth Metrolink, and the University of Minnesota. The [Metropolitan Council works with](#) each provider to ensure the transit system is integrated in addressing the region's needs.

Historically, all regional transit providers who collect fare revenue have participated in a common regional fare structure, coordinated by the Metropolitan Council.⁵ A regional approach to fare policy provides seamless travel for riders among providers and modes. Assuming this participation continues, the proposed fare changes would affect fare policy on nearly all regular-route service offered by the Metropolitan Council, Metro Transit, MVTA, SouthWest Transit, Maple Grove Transit, and Plymouth Metrolink.

Federal Requirements

The Federal Transit Administration (FTA) requires recipients of federal funding, including Metro Transit, to ensure communities of color and people with lower incomes do not experience discrimination in access to transit service. This FTA requirement stems from Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance; and President Clinton's *Executive Order 12898 - Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* (1994), which directed federal agencies to consider impacts to low-income populations as well.

As part of this effort, FTA requires transit providers such as Metro Transit to conduct a Title VI fare equity analysis, prior to implementation, for any proposed fare change, regardless of the amount of increase or decrease. This analysis fulfills this requirement as it relates to potential fare changes proposed as part of simplification efforts.

⁵ Though it is part of the regional regular-route transit system, the University of Minnesota regular-route public transit system is fare-free.

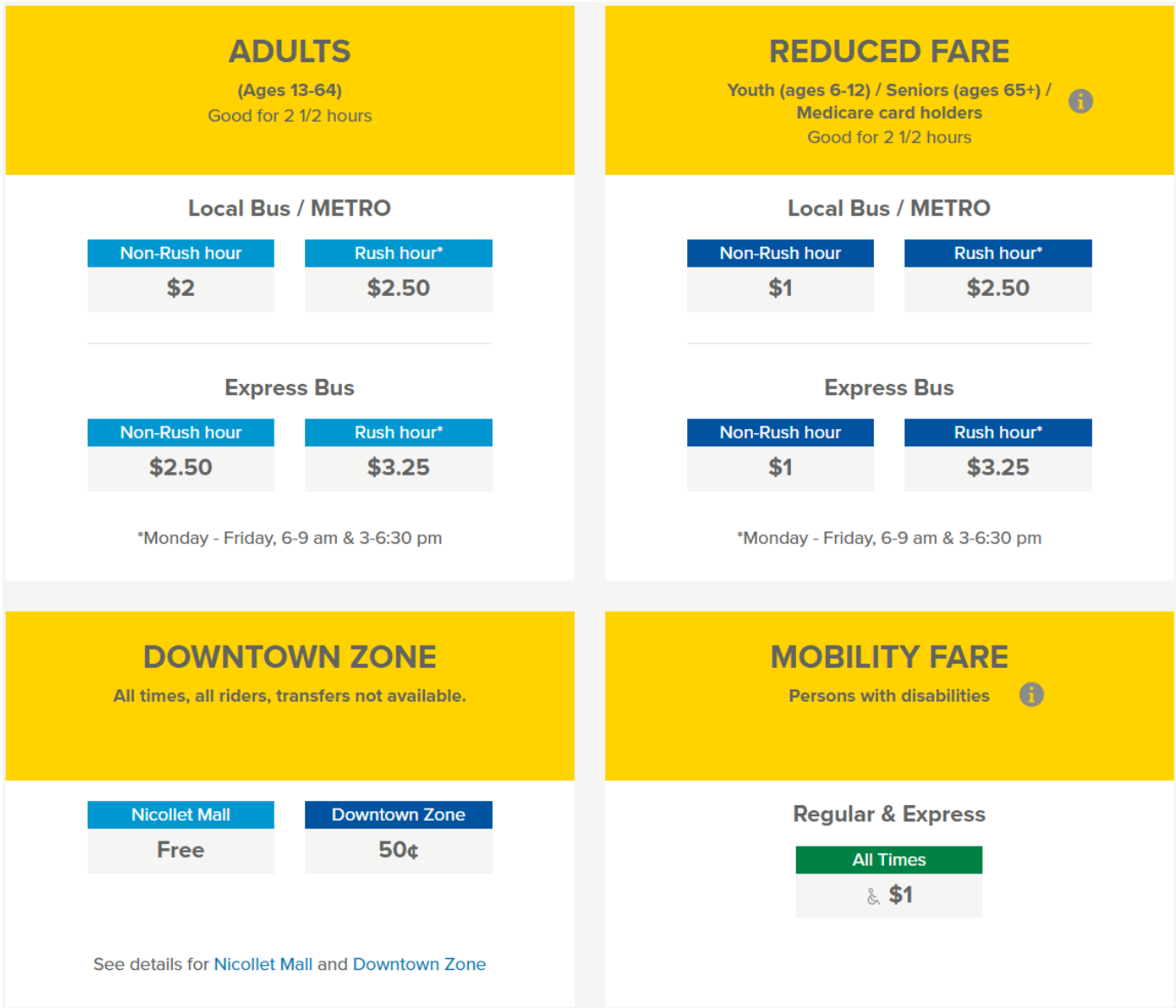
CHAPTER 2: EXISTING AND PROPOSED FARES

Factors Affecting Existing Fares

Figure 1 summarizes the current base fare structure for regular-route service in the region, except Northstar Commuter Rail. Further, special event service (i.e., State Fair, etc.) and public shared ride demand response services like Metro Mobility and Transit Link are not part of the fare structure for regular-route service.

Base fares vary depending on fare type, service type, and time of day. Beyond the base fare, how a rider pays their fare - their payment method (e.g., cash, pass, etc.) - may also affect the financial cost to ride. These factors that contribute to unique fare combinations are described below.

Figure 1. Existing Base Fare Structure



Fare Types

There are four primary fare types (as indicated in Figure 1) and a fifth supplemental fare type. About 90% of regional fixed-route riders use the **Adult** fare type, available to people ages 13 to 64. The **Reduced Fare** type is available to youth (ages 6-12), seniors (ages 65+), and Medicare card holders. Youth ages five and under ride free with a fare-paying customer. Currently, Reduced Fare riders receive \$1.00 discounted fares during non-rush-hours. The third fare type, **Mobility Fare**, is available to persons with disabilities; Mobility Fare riders pay \$1.00 fares per ride, regardless of service type or time of day. The **Downtown Zone** fare type is available to those riding entirely within [designated areas](#) of downtown Minneapolis and downtown Saint Paul. Rides on Nicollet Mall, which is within the Minneapolis Downtown Zone, are free. All fares (except Downtown Zone) include a free 2 ½ hour transfer.

Lastly, qualified riders may participate in the **Transit Assistance Program (TAP)**, the fifth fare type. Launched in October 2017, TAP is designed to make public transit more affordable for lower income residents. [TAP allows customers to use local bus / METRO or express bus service for just \\$1.00 per ride - even during rush hour - with a free 2 ½ hour transfer.](#) To receive a TAP Card and become eligible for \$1.00 fares, residents must provide personal identification and documentation that they meet the program's income guidelines and re-certify annually.

Service Types &

Currently, the fare for Adult and Reduced Fare types differs by service type and time of day. For purposes of fare policy, there are two fare types: **Local Bus / METRO** (e.g., light rail, rapid bus) and **Express Bus**. The fare is higher for Express Bus service given that express bus routes tend to operate over greater distances than routes operating Local Bus / METRO service. See **APPENDIX**

A: SERVICE TYPE DETAILS for a list of regular fixed routes by service type and provider.

Among regular route service provided by the Metropolitan Council, Metro Transit, MVTA, SouthWest Transit, Maple Grove Transit, and Plymouth Metrolink, local service accounted for about 86% of regional ridership in 2019, with express service making up the remaining 14%. In 2019, local service (as opposed to Express Bus) accounted for 90% of Metro Transit/Metropolitan Council regular route ridership; the comparable value was 23% for MVTA, 5% for Plymouth MetroLink, 3% for SouthWest Transit, and 1% for Maple Grove Transit (See **APPENDIX A: SERVICE TYPE DETAILS**).

The two times of day that affect fares are **Rush Hour** and **Non-Rush-Hour**, where Rush Hour is defined as Monday - Friday, 6-9 am and 3-6:30 pm, and Non-Rush-Hour is all other times during the week.

Payment Methods

Beyond the base fare (**Figure 1**), a rider's payment method (i.e., cash, pass, etc.) will also affect the financial cost to riders. Though not a formal distinction, fare payment methods can be grouped into two categories: 1) cash and cash-like products and 2) passes.

Fares validated with cash and cash-like payment methods include cash (i.e., bills and coins), debit / credit card (at ticket vending machines), through an authorized mobile app, or via Go-To stored value cards - a durable plastic smartcard loaded with stored value, which is deducted with each paid boarding. Passes include a variety of ride-limited or time-limited passes, which are administered through a smartcard similar to Go-To stored value card. Time-limited passes allow unlimited rides within a certain period of time, like a month or school semester, for a discounted up-front cost (e.g., U-Pass costs \$114 per semester). Thus, the per-paid ride (excluding transfers) cost of unlimited-ride passes depends on how often a pass is used within the allotted amount of time.

Recent Fare Changes

The Metropolitan Council's most recent regional transit fare change became effective October 1, 2017. The approved fare change increased by \$0.25 the fare for fixed-route local bus, express bus, and METRO service; the bonus on stored value purchases was also eliminated. Additionally, the Metropolitan Council introduced TAP in conjunction with the package of fare changes, setting the stage for other fare simplification initiatives.

Proposed Fare Change

The three fare change scenarios analyzed in this report are summarized in Table 1, and in Table 2 alongside the absolute and percent change in fares. One scenario would be considered for approval by the Metropolitan Council.

The proposed fare changes remove time of day (Rush Hour and Non-Rush Hour) as a factor for the level of fare - applied to various combinations of fare type (Adult and Reduced Fare) and service type (Local Bus / METRO and Express Bus).

Table 2. Existing and Proposed Fares, Scenarios 1, 2, and 3

Fare Type	Service Type	Time of Day [^]	Existing Fare	Proposed Fare	Absolute Change	Percent Change	Applicable Scenario(s)
Adult*	Local Bus / METRO	Non-Rush Hour	\$2.00	\$2.00	--	--	--
Adult*	Local Bus / METRO	Rush Hour	\$2.50	\$2.00	-\$0.50	-20.0%	1
Adult*	Express Bus	Non-Rush Hour	\$2.50	\$2.50	+\$0.50	+20.0%	2
Adult*	Express Bus	Rush Hour	\$3.25	\$3.25	-\$0.25	-7.7%	2
Reduced Fare**	Local Bus / METRO	Non-Rush Hour	\$1.00	\$1.00	--	--	--
Reduced Fare**	Local Bus / METRO	Rush Hour	\$2.50	\$1.00	-\$1.50	-60.0%	1, 2, 3
Reduced Fare**	Express Bus	Non-Rush Hour	\$1.00	\$1.00	--	--	--
Reduced Fare**	Express Bus	Rush Hour	\$3.25	\$1.00	-\$2.25	-69.2%	1, 2, 3
Mobility Fare	All	All	\$1.00	\$1.00	--	--	--
Downtown Zone	All	All	\$0.50	\$0.50	--	--	--
Downtown Zone: Nicollet Mall	All	All	\$0.00	\$0.00	--	--	--

Transit Assistance Program (TAP)	All	All	\$1.00	\$1.00	--	--	--
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*Ages 13-64

**Youth (ages 6-12), Seniors (ages 65+), and Medicare card holders

^Rush hour defined as Monday - Friday, 6-9 am and 3-6:30 pm

CHAPTER 3: 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.⁶

Moreover, FTA guidance recognizes the inherent overlap between Title VI and environmental justice principles, which extend protections to low-income populations. In 1994, President Clinton issued *Executive Order 12898 - Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, 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.⁷

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.”⁸

To provide direction to recipients of federal funding, FTA issued *Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients* in 2012.⁹ 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, including fare equity analyses.

Title VI Program

The Metropolitan Council’s commitment to Title VI of the Civil Rights Act of 1964 is documented in the agency’s Title VI Program, which includes policies and procedures that:

- Ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner;
- Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin; and
- Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

⁶ U.S. Department of Labor, *Title VI, Civil Rights Act of 1964*, <https://www.dol.gov/agencies/oasam/regulatory/statutes/title-vi-civil-rights-act-of-1964>.

⁷ U.S. President, Proclamation, *Executive Order 12898: Federal Actions To Address Environmental Justice in Minority Populations and Low-Income Populations*, Feb. 11, 1994, <https://www.archives.gov/files/federal-register/executive-orders/pdf/12898.pdf>.

⁸ Federal Transit Administration, *Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients*, October 1, 2012, page I-6, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf.

⁹ FTA, *Circular 4702.1B*.

The Title VI Program also applies to Metro Transit, is updated by the Metropolitan Council every three years, and is available online and upon request.¹⁰ This report references several elements from the current Title VI Program, approved by the Metropolitan Council in January 2020.

Requirement to Conduct Fare Equity Analyses

Transit providers that operate 50 or more fixed route vehicles in peak service and are located in an urbanized area of 200,000 or more in population, including Metro Transit, are required to prepare and submit a fare equity analysis, prior to implementation, for any proposed fare change, regardless of the amount of increase or decrease. This analysis fulfills this requirement as it relates to potential fare changes proposed as part of simplification efforts.

In accordance with FTA Circular 4702.1B, completion of a fare equity analysis requires the incorporation of several Title VI policies, which are set by the transit provider. These include the and **“disparate impact” and “disproportionate burden” policies**, used to assess whether the effects of proposed fare changes rise to the level of disparate impact on racial/ethnic minority populations and disproportionate burden on low-income populations, respectively.

Discrimination, Disparate Impact, and Disproportionate Burden

In FTA Circular 4702.1B, discrimination is defined as referring 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.¹¹

Disparate impact, a key concept for understanding Title VI regulations, is defined in the Circular as:

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.¹²

Similarly, FTA defines *disproportionate burden* as:

a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations.¹³

Per FTA guidance, Metro Transit uses its disparate impact and disproportionate burden policy thresholds as evidence of impacts severe enough to meet the definition of disparate impact or disproportionate burden.

¹⁰ Metropolitan Council, *Title VI Program*, January 2020, <https://www.metrotransit.org/Data/Sites/1/media/about/titlevi/2020%20Title%20VI%20Program%20Update.pdf>.

¹¹ Federal Transit Administration, *Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients*, October 1, 2012, page I-2, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf.

¹² FTA, *Circular 4702.1B*, page I-2

¹³ FTA, *Circular 4702.1B*, page I-2

Metro Transit has defined its **disparate impact and disproportionate burden policies** and thresholds using the “80% rule”, which states that there may be evidence of disparate impact if:

- *Benefits* are being provided to BIPOC populations at a rate less than 80% of the benefits being provided to white populations, or
- *Adverse effects* are being borne by white populations at a rate less than 80% of the adverse effects being borne by BIPOC populations.

Metro Transit uses the same framework when evaluating whether low-income populations would experience disproportionate burden relative to the impacts on non-low-income populations.

The 80% 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.¹⁴ The 80% rule suggests that a selection rate for any racial, ethnic, or gender group that is less than 80% 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. Dozens of transit agencies, including some of the largest in the country, use a similar framework when defining their disparate impact and disproportionate burden policies.

Metro Transit’s decision to use the 80% rule for its disparate impact and disproportionate burden thresholds was subject to a formal public outreach process before being adopted by the Metropolitan Council in 2013. Additional information about the policies and their applications can be found in the Council’s current Title VI Program.¹⁵

Policies Applied to Proposed Fare Simplification

Each of the three proposed packages of fare changes evaluated in this report would simplify the regional fare structure and decrease fares slightly for the average rider of the regional regular-route transit system.

As such, in this analysis, if the quantitative results indicate that the percent decrease in the average fare for BIPOC (minority) riders is less than 80 percent of the percent decrease in the average fare for white (non-minority) riders, this could be evidence of a disparate impact. In this case, additional analysis will be conducted, and potential mitigation measures will be identified if necessary.

A fare change that results in a disparate impact may only be implemented if:

- There is a substantial legitimate justification for the proposed fare change, and
- There are no alternatives that would have a less disparate impact while still accomplishing the transit provider’s legitimate program goals.

This same framework applies for determination of disproportionate burden on low-income riders.

¹⁴ Section 60-3.4(D), *Uniform Guidelines on Employee Selection Procedure* (1978); 43 FR 38295, August 25, 1978, <https://www.ecfr.gov/current/title-41/subtitle-B/chapter-60/part-60-3>.

¹⁵ Metropolitan Council, *Title VI Program*, January 2020, <https://www.metrotransit.org/Data/Sites/1/media/about/titlevi/2020%20Title%20VI%20Program%20Update.pdf>.

Title VI Definitions of Minority and Low-Income Populations

Racial and Ethnic Minorities

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.¹⁶ However, as part of efforts to use respectful and inclusive language, Metro Transit and the Metropolitan Council prefer to use the term BIPOC or communities of color, rather than “minority” when referring to people who identify as one or more of the above racial or ethnic groups. As such, references to BIPOC or communities of color in this report should be interpreted to mean the same thing as “minority”.

For the purposes of this evaluation, “non-minority” or “non-BIPOC” persons are defined as those who self-identify as non-Hispanic white (or simply “white”). All other persons, including those identifying as two or more races and/or ethnicities, are defined as BIPOC (equivalent to “minority”). FTA requires transit providers to evaluate fare changes using this dichotomy between “minority” and “non-minority” populations.

Low-Income Population

While low-income populations are not an explicitly protected class under Title VI of the Civil Rights Act of 1964, FTA recognizes the inherent overlap between the principles of Title VI and environmental justice more broadly. Consequently, FTA encourages required transit providers to conduct fare equity analyses with regard to low-income populations in addition to minority populations, and to identify any disproportionate burden placed on low-income populations.

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 family/household size. However, FTA Circular 4702.1B also allows for low-income populations to be defined by transit providers using other established measures that are at least as inclusive as those developed by HHS.

Correspondingly, this Title VI fare equity analysis used 185% of the HHS poverty guidelines for year 2016 (matching the period represented by on-board survey data, explained in the following chapter). The Metropolitan Council uses 185% of poverty to define poverty in its place-based equity research, regional policies, and other initiatives, and this Title VI analysis mirrors that approach.¹⁷ Table 3 lists 185% of the 2016 HHS poverty guidelines that are used in this analysis.

¹⁶ More specifically, FTA Circular 4702.1B (page I-4) defines minority persons as including the following identities: (1) 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; (2) 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; (3) Black or African American, which refers to people having origins in any of the Black racial groups of Africa; (4) Hispanic or Latino, which includes people of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race; and (5) 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.

¹⁷ The use of 185% of poverty guidelines differs from some previous fare equity analyses, which used 100% of guidelines. The decision to use 185% of guidelines was a result of a recent internal review of Metro Transit and the Council’s Title VI equity analysis practices, and research on those used by other agencies nationwide. The review found that half of the 26 transit agencies reviewed used a definition of “low income” that was more inclusive than the standard definition (100%) suggested by FTA in Circular 4702.1B.

Table 3. 2016 Department of Health and Human Services Poverty Guidelines in Dollars

By Size of Family Unit and Number of Related Children Under 18 Years of Age

Size of Family Unit	100% Poverty Guideline (\$)	185% Poverty Guideline (\$)
1	\$11,880	\$21,978
2	\$16,020	\$29,637
3	\$20,160	\$37,296
4	\$24,300	\$44,955
5	\$28,440	\$52,614
6	\$32,580	\$60,273
7	\$36,730	\$67,951
8	\$40,890	\$75,647
For each additional person add	\$4,140	\$7,696

Source: <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

CHAPTER 4: ANALYSIS METHODOLOGY

Process

This fare equity analysis was completed using the following four-step process:

1. Determine the number and percent of users of each unique fare combination, including user demographics;
2. Calculate average fare for each demographic group under existing conditions and under proposed fare changes;
3. Compare changes in average fare among the different demographic groups and apply Title VI policies to determine potential for disparate impact or disproportionate burden; and
4. Explore alternatives, as necessary, to avoid, minimize, or mitigate disparate impacts or disproportionate burdens.

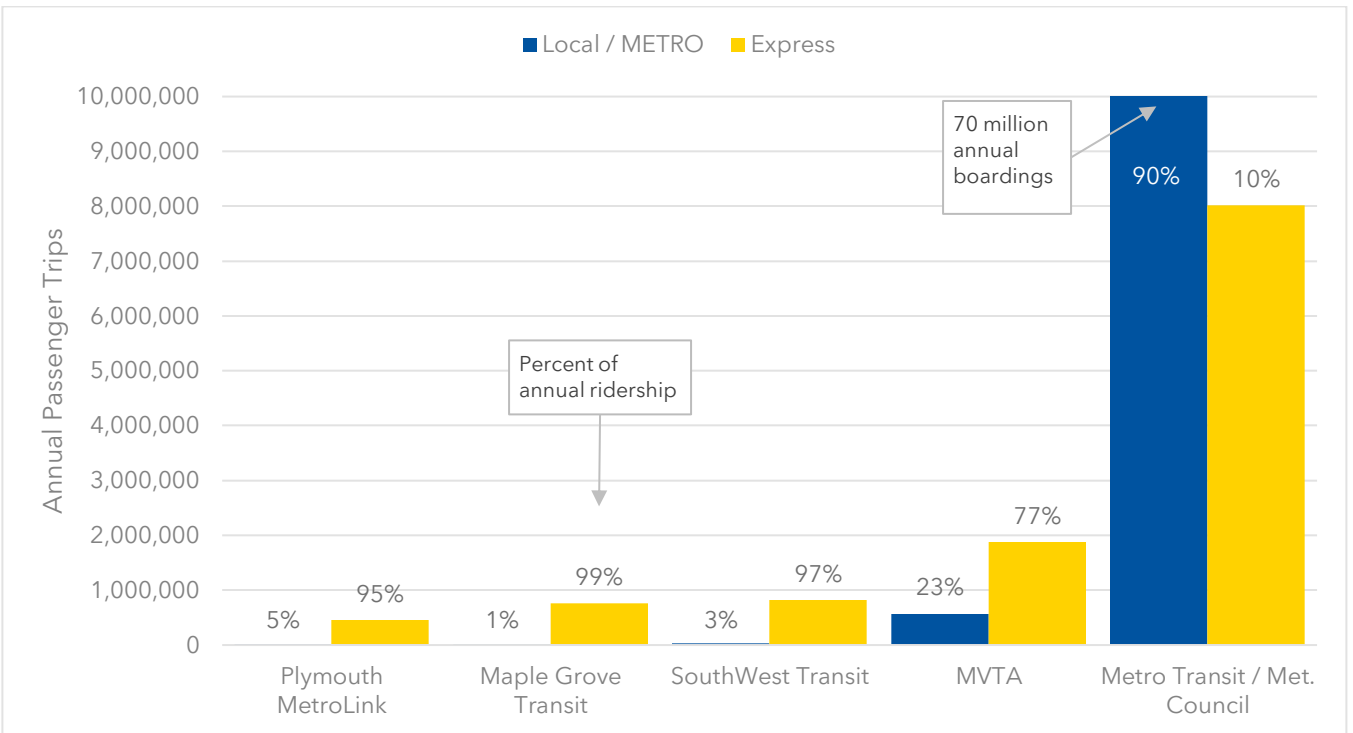
Results from these steps are shown in *Chapter 5: Evaluation of Impacts*. Below are descriptions of the data sources, processing methods, and assumptions used to arrive at results. See also *Appendix A:*

Service Type **DETAILS**

Figure 2 shows the number and percent of 2019 annual passenger trips (ridership) by service type for all regular fixed routes by regional transit provider. The source of these data are the Metropolitan Council's 2019 Regional Route Performance Analysis. Year 2019 was the last full year before the beginning of the COVID-19 pandemic, which had a significant impact on transit ridership in the region and nationwide. The ridership numbers are provided for context only, as they differ from those derived from the primary data source of the fare equity analysis, the Travel Behavior Inventory (TBI) 2016 Transit On Board Survey.

Figure 2. 2019 Annual Passenger Trips by service type and regional transit provider

Excludes Northstar commuter rail and special event service



Source: [Metropolitan Council's 2019 Regional Route Performance Analysis](#)

Also referencing data from the 2019 Regional Route Performance Analysis, Table 21 lists all regional regular routes that operated at one point in 2019, alongside the regional transit provider of the route, the service type (for fare purposes), and total annual passenger trips.

Table 21. Regional Regular Fixed Routes by Service Type

Source: [Metropolitan Council's 2019 Regional Route Performance Analysis](#)

Provider	Service Type	Route	Annual Passenger Trips (2019)
Metro Transit	Local	2	1,645,480
Metro Transit	Local	3	1,730,087
Metro Transit	Local	4	1,514,308
Metro Transit	Local	5	3,913,674
Metro Transit	Local	6	2,185,490
Metro Transit	Local	7	460,694
Metro Transit	Local	9	727,866
Metro Transit	Local	10	1,979,398

Provider	Service Type	Route	Annual Passenger Trips (2019)
Metro Transit	Local	11	1,251,596
Metro Transit	Local	12	312,203
Metro Transit	Local	14	1,414,948
Metropolitan Council	Local	16	115,947
Metro Transit	Local	17	1,517,381
Metro Transit	Local	18	2,870,952
Metro Transit	Local	19	992,036
Metro Transit	Local	21	3,195,359
Metro Transit	Local	22	1,484,659
Metro Transit	Local	23	442,364
Metro Transit	Local	25	231,195
Metropolitan Council	Local	27	21,676
Metropolitan Council	Local	30	174,396
Metro Transit	Local	32	469,639
Metro Transit	Local	39	29,170
Metro Transit	Local	46	297,807
Metro Transit	Express	53	190,650
Metro Transit	Local	54	1,547,432
Metro Transit	Local	59	145,922
Metro Transit	Local	61	620,208
Metro Transit	Local	62	757,749
Metro Transit	Local	63	1,203,393
Metro Transit	Local	64	1,200,064
Metro Transit	Local	65	292,593
Metro Transit	Local	67	269,951
Metro Transit	Local	68	900,350
Metro Transit	Local	70	191,846
Metro Transit	Local	71	426,965
Metro Transit	Local	74	1,200,718
Metro Transit	Local	75	174,525
Metropolitan Council	Local	80	109,092
Metropolitan Council	Local	83	124,281
Metropolitan Council	Local	84	136,366
Metropolitan Council	Local	87	256,511
Metro Transit	Express	94	488,167
Metro Transit	Express	111	15,826
Metro Transit	Express	113	88,767
Metro Transit	Express	114	101,415
Metro Transit	Express	115	9,417
Metropolitan Council	Express	118	16,920
Metro Transit	Local	129	12,284

Provider	Service Type	Route	Annual Passenger Trips (2019)
Metro Transit	Express	133	56,600
Metro Transit	Express	134	128,059
Metro Transit	Express	135	69,020
Metro Transit	Local	141	88,995
Metro Transit	Express	146	94,233
Metro Transit	Express	156	118,842
Metropolitan Council	Local	219	160,272
Metropolitan Council	Local	223	33,985
Metropolitan Council	Local	225	25,499
Metropolitan Council	Local	227	21,945
Metro Transit	Express	250	383,571
Metro Transit	Express	252	20,570
Metro Transit	Express	261	93,634
Metro Transit	Local	262	21,032
Metro Transit	Express	263	85,862
Metro Transit	Express	264	134,743
Metro Transit	Express	265	43,816
Metro Transit	Express	270	314,883
Metro Transit	Express	272	9,921
Metro Transit	Express	275	100,302
Metro Transit	Express	288	138,258
Metro Transit	Express	294	66,778
Metropolitan Council	Express	350	28,726
Metro Transit	Express	351	73,690
Metro Transit	Express	353	6,535
Metro Transit	Express	355	246,438
Metro Transit	Express	361	50,210
Metropolitan Council	Express	364	11,120
Metro Transit	Express	365	169,036
Metro Transit	Express	375	170,529
Metro Transit	Local	415	2,493
Metropolitan Council	Express	417	5,165
MVTA	Local	420	18,387
MVTA	Local	421	4,429
MVTA	Local	426	7,307
MVTA	Local	436	23,582
MVTA	Local	440	43,119
MVTA	Local	442	27,992
MVTA	Local	444	233,634
MVTA	Local	445	13,760
MVTA	Local	446	69,249

Provider	Service Type	Route	Annual Passenger Trips (2019)
Metro Transit	Express	452	31,762
MVTA	Express	460	398,618
MVTA	Express	464	51,153
MVTA	Express	465	215,792
Metro Transit	Express	467	297,589
MVTA	Express	470	109,604
MVTA	Express	472	67,609
MVTA	Express	475	58,451
MVTA	Express	476	88,250
MVTA	Express	477	346,040
MVTA	Express	478	48,301
MVTA	Express	479	11,468
MVTA	Express	480	129,186
MVTA	Express	484	55,825
MVTA	Local	489	16,441
MVTA	Express	490	126,881
MVTA	Express	491	5,349
MVTA	Express	492	2,072
MVTA	Express	493	55,379
MVTA	Express	495	114,065
MVTA	Local	497	15,982
MVTA	Express	498	240
MVTA	Local	499	15,830
Metro Transit	Local	515	460,132
Metro Transit	Express	535	383,789
Metropolitan Council	Local	537	17,321
Metropolitan Council	Local	538	115,296
Metropolitan Council	Local	539	215,133
Metropolitan Council	Local	540	183,338
Metropolitan Council	Local	542	48,086
Metro Transit	Express	552	51,422
Metro Transit	Express	553	47,555
Metro Transit	Express	554	78,714
Metro Transit	Express	558	44,651
Metro Transit	Express	578	104,748
Metro Transit	Express	579	19,283
Metro Transit	Express	587	59,244
Metro Transit	Express	588	8,110
Metro Transit	Express	589	45,853
Metro Transit	Express	597	126,166
Southwest Transit	Local	600	4,728

Provider	Service Type	Route	Annual Passenger Trips (2019)
Southwest Transit	Express	602	2,568
Metropolitan Council	Local	604	11,501
Metro Transit	Local	612	189,507
Metropolitan Council	Local	614	5,929
Metropolitan Council	Local	615	44,260
Metro Transit	Express	643	26,069
Metro Transit	Express	645	389,532
Metro Transit	Express	652	32,178
Metro Transit	Express	663	115,767
Metro Transit	Express	664	49,097
Metro Transit	Express	667	102,474
Metro Transit	Express	668	32,433
Metropolitan Council	Express	670	34,875
Metropolitan Council	Express	671	19,106
Metro Transit	Express	672	52,546
Metro Transit	Express	673	146,099
Metro Transit	Express	674	22,511
Metro Transit	Express	677	40,349
Metro Transit	Express	679	3,385
Southwest Transit	Express	690	344,222
Southwest Transit	Express	691	3,296
Southwest Transit	Express	692	10,717
Southwest Transit	Express	695	81,343
Southwest Transit	Express	697	83,186
Southwest Transit	Express	698	175,352
Southwest Transit	Express	699	123,000
Metropolitan Council	Local	705	66,439
Metropolitan Council	Local	716	43,613
Metropolitan Council	Local	717	69,595
Metro Transit	Local	721	238,170
Metro Transit	Local	722	248,869
Metro Transit	Local	723	167,683
Metro Transit	Local	724	574,833
Plymouth	Local	740	6,052
Plymouth	Local	741	9,631
Plymouth	Express	742	21,608
Plymouth	Express	747	57,093
Metro Transit	Express	755	98,329
Metro Transit	Express	756	46,704
Metro Transit	Express	758	107,550
Metro Transit	Express	760	112,504

Provider	Service Type	Route	Annual Passenger Trips (2019)
Metro Transit	Express	761	50,970
Metropolitan Council	Express	762	23,457
Metro Transit	Express	763	47,348
Metro Transit	Express	764	50,139
Metro Transit	Express	765	34,154
Metro Transit	Express	766	126,985
Metro Transit	Express	767	44,805
Metro Transit	Express	768	349,523
Plymouth	Local	771	6,093
Plymouth	Express	772	63,158
Plymouth	Express	774	87,867
Plymouth	Express	776	80,491
Plymouth	Express	777	55,595
Maple Grove Transit	Express	780	18,640
Maple Grove Transit	Express	781	396,442
Maple Grove Transit	Express	782	37,745
Maple Grove Transit	Express	783	60,109
Maple Grove Transit	Express	785	235,386
Maple Grove Transit	Local	787	2,519
Maple Grove Transit	Local	788	6,283
Maple Grove Transit	Express	789	17,953
Plymouth	Express	790	79,817
Plymouth	Local	791	3,290
Plymouth	Express	793	10,755
Plymouth	Express	795	5,372
Metropolitan Council	Local	801	73,770
Metropolitan Council	Local	805	86,770
Metro Transit	Local	824	40,356
Metro Transit	Local	825	127,408
Metropolitan Council	Local	831	23,126
Metro Transit	Express	850	450,802
Metro Transit	Express	852	225,392
Metro Transit	Express	854	108,481
Metro Transit	Express	860	116,019
Metro Transit	Express	865	131,935
MVTA	Local	445 / 438	72,146
Southwest Transit	Local	SW Flex	20,859
Metro Transit	Local	METRO Blue Line	11,045,239
Metro Transit	Local	METRO Green Line	14,254,202
Metropolitan Council	Local	METRO Red Line	242,372
Metro Transit	Local	METRO A Line	1,676,916

Provider	Service Type	Route	Annual Passenger Trips (2019)
Metro Transit	Local	METRO C Line	1,218,836

APPENDIX B: METHODOLOGY DETAILS.

Data Source

Fare use and transit rider demographics were gathered from the most recent Travel Behavior Inventory (TBI) 2016 Transit On Board Survey.¹⁸ The TBI is a comprehensive survey conducted every 5 years by the Metropolitan Council to assess how and how much people in the Twin Cities region travel, including what mode of transportation they use, where they go, and when. The Metropolitan Council is updating the TBI transit on board survey to represent conditions as of fall 2021, however, these data were not available at the time of analysis.¹⁹

The TBI on board survey is designed using robust sampling methods to achieve a representative random sample; it is considered the most detailed and accurate source of information on the demographics and travel patterns of the customers of Metro Transit and regional transit providers. As such, the TBI on board survey is the preferred data source for use in the Metropolitan Council’s Title VI Program and applicable equity analyses.

Each record in the TBI on board survey is weighted to represent the number of transit boardings (unlinked trips) per day and the number of transit trips (linked trips) per day, for an average day. This analysis used linked transit trips to represent the trips when a passenger paid their fare; this approach thus excludes transfer trips, which are free in the regional fare structure.

Cleaning Survey Data

The data comprising the TBI on board survey were collected in late 2016, using a weighted random sample by ridership by line. Survey documents were made available in multiple languages, including English, Spanish, Hmong, and Somali.²⁰ The survey results include detailed transit trip (origin to destination) records for 30,605 transit trips across all providers and regional regular routes.

The TBI on board survey data include valuable demographic, service, and fare information that enable the creation of demographic rider profiles by unique fare combination. Table 4 lists variables from the survey that were used to inform this fare equity analysis.

Table 4. On Board Survey Variables Applicable to Analysis

Type	Variable	Response Options*
Demographic	Race/Ethnicity**	American Indian or Alaskan Native, Asian, Black or African American, Hispanic or Latino, Native Hawaiian or Pacific Islander, White, Other.

¹⁸ Metropolitan Council, *Travel Behavior Inventory (TBI) 2016 On Board Survey*, <https://gisdata.mn.gov/dataset/us-mn-state-metc-society-tbi-transit-onboard2016>.

¹⁹ The Metropolitan Council had planned on updating the TBI transit on board survey in 2019 and 2020. However, in light of the COVID-19 pandemic and at the direction of FTA, the Council chose to delay making updates to the survey in hopes of capturing more “typical” travel patterns.

²⁰ Language assistance resources made available based on the Metropolitan Council’s Language Assistance Plan at the time.

\$25,000 - \$34,999	\$30,000	--	--	LI	LI	LI	LI	LI	LI	LI	LI
\$35,000 - \$59,999	\$47,500	--	--	--	--	LI	LI	LI	LI	LI	LI
\$60,000 - \$99,999	\$80,000	--	--	--	--	--	--	--	--	LI	LI
\$100,000 - \$149,999	\$125,000	--	--	--	--	--	--	--	--	--	--
\$150,000 - \$199,999	\$175,000	--	--	--	--	--	--	--	--	--	--
\$200,000 or more	\$200,000	--	--	--	--	--	--	--	--	--	--

Excluded Survey Records

TBI on board survey records with one or more of following characteristics were excluded from the analysis:

- Respondents who did not report one or more racial or ethnic identities, representing 0.5% of total daily linked trips in the original dataset
- Respondents who did not report their total annual household income and/or household size, representing 14.9% of total daily linked trips in the original dataset²¹
- Route provider equal to “U of M”, representing 7.5% of total daily linked trips in the original dataset; the University of Minnesota’s free campus shuttle system is fare-free and not included in the regional fare structure
- Route type equal to “Commuter Rail”, representing 0.7% of total daily linked trips in the original dataset; Metro Transit’s Northstar Commuter Rail line uses a separate distance-based fare structure in which the fare varies by boarding station, and the proposed fare changes do not affect this separate fare structure
- Payment method equal to “Day Pass”, representing 0.3% of total daily linked trips in the original dataset; the day pass payment method is no longer offered
- Payment method equal to “Weekly / Monthly Pass” or “Other”, representing 6.3% of total daily linked trips in the original dataset; these responses do not provide enough information to determine the fare value on a per-paid trip basis
- Payment method equal to “Free Fare Zone”, representing 5.1% of total daily linked trips in the original dataset; many records with this payment method indicated use on routes where it does not apply - that is, routes other than those that operate on Nicollet Mall in Downtown Minneapolis. Given the frequency of these incompatibilities / inaccuracies, all records with “Free Fare Zone” payment methods were excluded from analysis.

After removing these excluded survey records, the final number of daily linked trips used in the analysis was 229,326, or 84.2% of those reported in the original dataset. As shown in Table 6, removing these records (including all U of M) from analysis had minimal impact on the share of total daily linked trips for most regional providers but increased Metro Transit’s share by about seven percentage points (83.4% to 90.1%).

²¹ This analysis evaluated disproportionate burden on low-income riders separate from disparate impact on BIPOC riders. Thus, if a survey record had insufficient household income and/or size data but did have sufficient race / ethnicity data, that record was excluded from the analysis of disproportionate burden on low-income riders but was included in the analysis of disparate impact on BIPOC riders.

Table 6. Number of Daily Linked Trips Used in Analysis by Regional Provider

Regional Provider	Original Dataset	Used in Analysis	Percent Change	Percent of Total in Original	Percent of Total in Analysis	Change in Percent of Total
Maple Grove	3,033	2,821	-7.0%	1.1%	1.2%	0.1%
Met Council	7,916	7,287	-7.9%	2.9%	3.2%	0.3%
Metro Transit	227,146	206,682	-9.0%	83.4%	90.1%	6.7%
MVTA	8,421	7,476	-11.2%	3.1%	3.3%	0.2%
Plymouth	1,542	1,403	-9.0%	0.6%	0.6%	0.0%
Southwest	3,950	3,656	-7.5%	1.5%	1.6%	0.1%
U of M	20,354	0	-100.0%	7.5%	0.0%	-7.5%
Total	272,363	229,326	-15.8%	100.0%	100.0%	0.0%

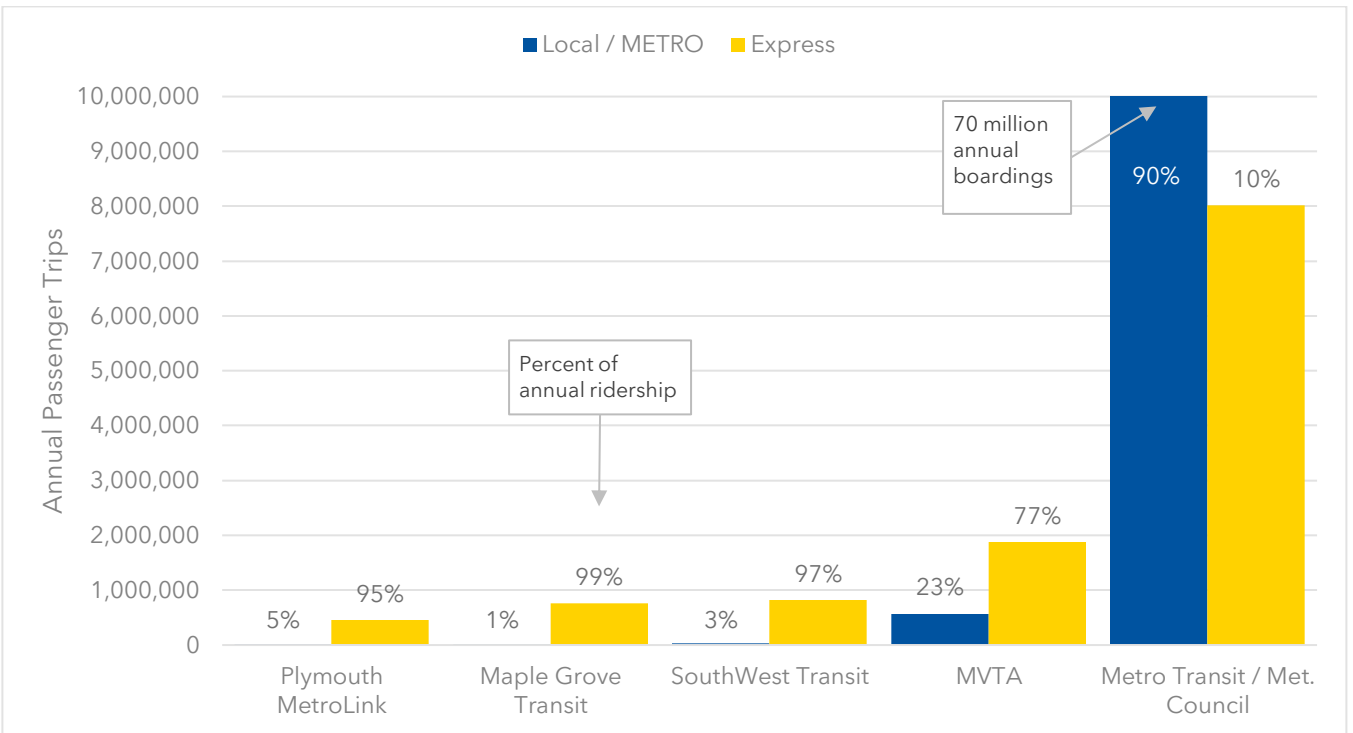
Developing Unique Fare Combinations

See *Appendix A: Service Type* **DETAILS**

Figure 2 shows the number and percent of 2019 annual passenger trips (ridership) by service type for all regular fixed routes by regional transit provider. The source of these data are the Metropolitan Council’s 2019 Regional Route Performance Analysis. Year 2019 was the last full year before the beginning of the COVID-19 pandemic, which had a significant impact on transit ridership in the region and nationwide. The ridership numbers are provided for context only, as they differ from those derived from the primary data source of the fare equity analysis, the Travel Behavior Inventory (TBI) 2016 Transit On Board Survey.

Figure 2. 2019 Annual Passenger Trips by service type and regional transit provider

Excludes Northstar commuter rail and special event service



Source: [Metropolitan Council's 2019 Regional Route Performance Analysis](#)

Also referencing data from the 2019 Regional Route Performance Analysis, Table 21 lists all regional regular routes that operated at one point in 2019, alongside the regional transit provider of the route, the service type (for fare purposes), and total annual passenger trips.

Table 21. Regional Regular Fixed Routes by Service Type

Source: [Metropolitan Council's 2019 Regional Route Performance Analysis](#)

Provider	Service Type	Route	Annual Passenger Trips (2019)
Metro Transit	Local	2	1,645,480
Metro Transit	Local	3	1,730,087
Metro Transit	Local	4	1,514,308
Metro Transit	Local	5	3,913,674
Metro Transit	Local	6	2,185,490
Metro Transit	Local	7	460,694
Metro Transit	Local	9	727,866
Metro Transit	Local	10	1,979,398

Provider	Service Type	Route	Annual Passenger Trips (2019)
Metro Transit	Local	11	1,251,596
Metro Transit	Local	12	312,203
Metro Transit	Local	14	1,414,948
Metropolitan Council	Local	16	115,947
Metro Transit	Local	17	1,517,381
Metro Transit	Local	18	2,870,952
Metro Transit	Local	19	992,036
Metro Transit	Local	21	3,195,359
Metro Transit	Local	22	1,484,659
Metro Transit	Local	23	442,364
Metro Transit	Local	25	231,195
Metropolitan Council	Local	27	21,676
Metropolitan Council	Local	30	174,396
Metro Transit	Local	32	469,639
Metro Transit	Local	39	29,170
Metro Transit	Local	46	297,807
Metro Transit	Express	53	190,650
Metro Transit	Local	54	1,547,432
Metro Transit	Local	59	145,922
Metro Transit	Local	61	620,208
Metro Transit	Local	62	757,749
Metro Transit	Local	63	1,203,393
Metro Transit	Local	64	1,200,064
Metro Transit	Local	65	292,593
Metro Transit	Local	67	269,951
Metro Transit	Local	68	900,350
Metro Transit	Local	70	191,846
Metro Transit	Local	71	426,965
Metro Transit	Local	74	1,200,718
Metro Transit	Local	75	174,525
Metropolitan Council	Local	80	109,092
Metropolitan Council	Local	83	124,281
Metropolitan Council	Local	84	136,366
Metropolitan Council	Local	87	256,511
Metro Transit	Express	94	488,167
Metro Transit	Express	111	15,826
Metro Transit	Express	113	88,767
Metro Transit	Express	114	101,415
Metro Transit	Express	115	9,417
Metropolitan Council	Express	118	16,920
Metro Transit	Local	129	12,284

Provider	Service Type	Route	Annual Passenger Trips (2019)
Metro Transit	Express	133	56,600
Metro Transit	Express	134	128,059
Metro Transit	Express	135	69,020
Metro Transit	Local	141	88,995
Metro Transit	Express	146	94,233
Metro Transit	Express	156	118,842
Metropolitan Council	Local	219	160,272
Metropolitan Council	Local	223	33,985
Metropolitan Council	Local	225	25,499
Metropolitan Council	Local	227	21,945
Metro Transit	Express	250	383,571
Metro Transit	Express	252	20,570
Metro Transit	Express	261	93,634
Metro Transit	Local	262	21,032
Metro Transit	Express	263	85,862
Metro Transit	Express	264	134,743
Metro Transit	Express	265	43,816
Metro Transit	Express	270	314,883
Metro Transit	Express	272	9,921
Metro Transit	Express	275	100,302
Metro Transit	Express	288	138,258
Metro Transit	Express	294	66,778
Metropolitan Council	Express	350	28,726
Metro Transit	Express	351	73,690
Metro Transit	Express	353	6,535
Metro Transit	Express	355	246,438
Metro Transit	Express	361	50,210
Metropolitan Council	Express	364	11,120
Metro Transit	Express	365	169,036
Metro Transit	Express	375	170,529
Metro Transit	Local	415	2,493
Metropolitan Council	Express	417	5,165
MVTA	Local	420	18,387
MVTA	Local	421	4,429
MVTA	Local	426	7,307
MVTA	Local	436	23,582
MVTA	Local	440	43,119
MVTA	Local	442	27,992
MVTA	Local	444	233,634
MVTA	Local	445	13,760
MVTA	Local	446	69,249

Provider	Service Type	Route	Annual Passenger Trips (2019)
Metro Transit	Express	452	31,762
MVTA	Express	460	398,618
MVTA	Express	464	51,153
MVTA	Express	465	215,792
Metro Transit	Express	467	297,589
MVTA	Express	470	109,604
MVTA	Express	472	67,609
MVTA	Express	475	58,451
MVTA	Express	476	88,250
MVTA	Express	477	346,040
MVTA	Express	478	48,301
MVTA	Express	479	11,468
MVTA	Express	480	129,186
MVTA	Express	484	55,825
MVTA	Local	489	16,441
MVTA	Express	490	126,881
MVTA	Express	491	5,349
MVTA	Express	492	2,072
MVTA	Express	493	55,379
MVTA	Express	495	114,065
MVTA	Local	497	15,982
MVTA	Express	498	240
MVTA	Local	499	15,830
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Metro Transit	Express	535	383,789
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Metropolitan Council	Local	538	115,296
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Metropolitan Council	Local	540	183,338
Metropolitan Council	Local	542	48,086
Metro Transit	Express	552	51,422
Metro Transit	Express	553	47,555
Metro Transit	Express	554	78,714
Metro Transit	Express	558	44,651
Metro Transit	Express	578	104,748
Metro Transit	Express	579	19,283
Metro Transit	Express	587	59,244
Metro Transit	Express	588	8,110
Metro Transit	Express	589	45,853
Metro Transit	Express	597	126,166
Southwest Transit	Local	600	4,728

Provider	Service Type	Route	Annual Passenger Trips (2019)
Southwest Transit	Express	602	2,568
Metropolitan Council	Local	604	11,501
Metro Transit	Local	612	189,507
Metropolitan Council	Local	614	5,929
Metropolitan Council	Local	615	44,260
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Metro Transit	Express	645	389,532
Metro Transit	Express	652	32,178
Metro Transit	Express	663	115,767
Metro Transit	Express	664	49,097
Metro Transit	Express	667	102,474
Metro Transit	Express	668	32,433
Metropolitan Council	Express	670	34,875
Metropolitan Council	Express	671	19,106
Metro Transit	Express	672	52,546
Metro Transit	Express	673	146,099
Metro Transit	Express	674	22,511
Metro Transit	Express	677	40,349
Metro Transit	Express	679	3,385
Southwest Transit	Express	690	344,222
Southwest Transit	Express	691	3,296
Southwest Transit	Express	692	10,717
Southwest Transit	Express	695	81,343
Southwest Transit	Express	697	83,186
Southwest Transit	Express	698	175,352
Southwest Transit	Express	699	123,000
Metropolitan Council	Local	705	66,439
Metropolitan Council	Local	716	43,613
Metropolitan Council	Local	717	69,595
Metro Transit	Local	721	238,170
Metro Transit	Local	722	248,869
Metro Transit	Local	723	167,683
Metro Transit	Local	724	574,833
Plymouth	Local	740	6,052
Plymouth	Local	741	9,631
Plymouth	Express	742	21,608
Plymouth	Express	747	57,093
Metro Transit	Express	755	98,329
Metro Transit	Express	756	46,704
Metro Transit	Express	758	107,550
Metro Transit	Express	760	112,504

Provider	Service Type	Route	Annual Passenger Trips (2019)
Metro Transit	Express	761	50,970
Metropolitan Council	Express	762	23,457
Metro Transit	Express	763	47,348
Metro Transit	Express	764	50,139
Metro Transit	Express	765	34,154
Metro Transit	Express	766	126,985
Metro Transit	Express	767	44,805
Metro Transit	Express	768	349,523
Plymouth	Local	771	6,093
Plymouth	Express	772	63,158
Plymouth	Express	774	87,867
Plymouth	Express	776	80,491
Plymouth	Express	777	55,595
Maple Grove Transit	Express	780	18,640
Maple Grove Transit	Express	781	396,442
Maple Grove Transit	Express	782	37,745
Maple Grove Transit	Express	783	60,109
Maple Grove Transit	Express	785	235,386
Maple Grove Transit	Local	787	2,519
Maple Grove Transit	Local	788	6,283
Maple Grove Transit	Express	789	17,953
Plymouth	Express	790	79,817
Plymouth	Local	791	3,290
Plymouth	Express	793	10,755
Plymouth	Express	795	5,372
Metropolitan Council	Local	801	73,770
Metropolitan Council	Local	805	86,770
Metro Transit	Local	824	40,356
Metro Transit	Local	825	127,408
Metropolitan Council	Local	831	23,126
Metro Transit	Express	850	450,802
Metro Transit	Express	852	225,392
Metro Transit	Express	854	108,481
Metro Transit	Express	860	116,019
Metro Transit	Express	865	131,935
MVTA	Local	445 / 438	72,146
Southwest Transit	Local	SW Flex	20,859
Metro Transit	Local	METRO Blue Line	11,045,239
Metro Transit	Local	METRO Green Line	14,254,202
Metropolitan Council	Local	METRO Red Line	242,372
Metro Transit	Local	METRO A Line	1,676,916

Provider	Service Type	Route	Annual Passenger Trips (2019)
Metro Transit	Local	METRO C Line	1,218,836

APPENDIX B: METHODOLOGY DETAILS for information about how unique fare combinations were developed using the remaining survey records. This includes the process used to further aggregate the survey data into usable fare combinations; how TAP riders were incorporated into analysis, and; the assumptions used to calculate per-trip fare values for riders using multiple-ride passes (i.e., 10-Ride Pass, Metropass, Employee Pass, College Pass, U Pass, and Student Pass).

CHAPTER 5: EVALUATION OF IMPACTS

Scenario 1

Proposed changes

The proposed package of changes under Scenario 1 are show in Table 7 and summarized below.

- Eliminate the Rush-Hour surcharge for Reduced Fare riders, resulting in a \$1.00 fare at all times of day on both Local Bus / METRO and Express Bus service types
- Eliminate the Rush-Hour surcharge for the Adult fare type on Local Bus / METRO service, resulting in a \$2.00 fare at all times of day on applicable routes

Table 7. Existing and Proposed Fares, Scenario 1

Fare Type	Service Type	Time of Day [^]	Existing Fare	Proposed Fare	Absolute Change	Percent Change
Adult*	Local Bus / METRO	Non-Rush Hour	\$2.00	\$2.00	--	--
Adult*	Local Bus / METRO	Rush Hour	\$2.50	\$2.00	-\$0.50	-20.0%
Adult*	Express Bus	Non-Rush Hour	\$2.50	\$2.50	--	--
Adult*	Express Bus	Rush Hour	\$3.25	\$3.25	--	--
Reduced Fare**	Local Bus / METRO	Non-Rush Hour	\$1.00	\$1.00	--	--
Reduced Fare**	Local Bus / METRO	Rush Hour	\$2.50	\$1.00	-\$1.50	-60.0%
Reduced Fare**	Express Bus	Non-Rush Hour	\$1.00	\$1.00	--	--
Reduced Fare**	Express Bus	Rush Hour	\$3.25	\$1.00	-\$2.25	-69.2%
Mobility Fare	All	All	\$1.00	\$1.00	--	--
Downtown Zone	All	All	\$0.50	\$0.50	--	--
Downtown Zone: Nicollet Mall	All	All	\$0.00	\$0.00	--	--
Transit Assistance Program	All	All	\$1.00	\$1.00	--	--

*Ages 13-64

**Youth (ages 6-12), Seniors (ages 65+), and Medicare card holders

[^]Rush hour defined as Monday – Friday, 6-9 am and 3-6:30 pm

Step 1: Determine Fare Use

Table 8 summarizes the riders impacted by the fare changes proposed in Scenario 1. About one in five regional riders would be impacted, including 19.4% of BIPOC riders, and 17.0% of low-income riders. All impacted riders would experience a decrease in fare.

Table 8. Impacted Riders, Scenario 1

Group	Percent of Total Riders	Percent of all BIPOC Riders	Percent of all Low-Income Riders	Percent BIPOC Riders	Percent Low-Income Riders
Impacted by change (Fare decrease)	19.0%	19.3%	17.0%	44.9%	35.1%
Regional system	100%	100%	100%	43.8%	39.0%
Difference	--	--	--	+1.1%	-3.9%

Similarly, but in much greater detail, Table 9 lists the 78 unique fare combinations of fare type, service type, time of day, and payment method that impact fare value. The fare combinations are presented alongside the current and proposed per-trip fare value, and the number and percent of users of each unique fare combination, including a breakdown by BIPOC riders, white riders, low-income riders, and non-low-income riders. The values from this table are used to calculate the average existing fare and average proposed fare for each rider group (Step 2).

Table 9. Existing and Proposed Unique Fare Combinations by Rider Group, Scenario 1

Existing and proposed per-trip fares incorporate payment method and relevant per-trip assumptions for multiple-ride passes (see Appendix A)

Fare Type	Service Type	Time of Day	Payment Method	Existing Fare per Trip	Proposed Fare per Trip	Absolute Change	Percent Change	Total Riders	BIPOC Riders	White Riders	Percent BIPOC Riders	Low-Income Riders	Non-Low-Income Riders	Percent Low-Income Riders	Percent of Total Riders	Percent of all BIPOC Riders	Percent of all Low-Income Riders
Adult	Local Bus / METRO	Non-Rush Hour	Cash or Similar	\$2.00	\$2.00	-	-	86,276	44,603	41,673	52%	32,321	41,470	44%	37.6%	44.4%	42.3%
Adult	Local Bus / METRO	Non-Rush Hour	Metropass	\$2.00	\$2.00	-	-	10,494	2,794	7,701	27%	1,586	7,913	17%	4.6%	2.8%	2.1%
Adult	Local Bus / METRO	Non-Rush Hour	Employee Pass	\$2.00	\$2.00	-	-	243	132	111	54%	30	186	14%	0.1%	0.1%	0.0%
Adult	Local Bus / METRO	Non-Rush Hour	U-Pass	\$1.51	\$1.51	-	-	12,267	5,002	7,265	41%	6,633	3,860	63%	5.3%	5.0%	8.7%
Adult	Local Bus / METRO	Non-Rush Hour	College Pass	\$2.00	\$2.00	-	-	4,721	2,359	2,362	50%	2,821	1,098	72%	2.1%	2.3%	3.7%
Adult	Local Bus / METRO	Non-Rush Hour	Student Pass	\$1.22	\$1.22	-	-	6,278	4,669	1,609	74%	2,372	1,436	62%	2.7%	4.6%	3.1%
Adult	Local Bus / METRO	Non-Rush Hour	10-Ride Pass	\$1.60	\$1.60	-	-	779	478	301	61%	464	210	69%	0.3%	0.5%	0.6%
Adult	Local Bus / METRO	Non-Rush Hour	Veteran	\$0.00	\$0.00	-	-	1,005	525	480	52%	482	394	55%	0.4%	0.5%	0.6%
Adult	Local Bus / METRO	Non-Rush Hour	Token	\$0.00	\$0.00	-	-	609	477	131	78%	336	128	72%	0.3%	0.5%	0.4%
Adult	Local Bus / METRO	Rush Hour	Cash or Similar	\$2.50	\$2.00	-\$0.50	-20.0%	33,763	16,580	17,183	49%	10,853	17,704	38%	14.7%	16.5%	14.2%
Adult	Local Bus / METRO	Rush Hour	Metropass	\$2.50	\$2.00	-\$0.50	-20.0%	6,002	1,632	4,370	27%	633	4,747	12%	2.6%	1.6%	0.8%
Adult	Local Bus / METRO	Rush Hour	Employee Pass	\$2.50	\$2.00	-\$0.50	-20.0%	205	86	120	42%	49	85	37%	0.1%	0.1%	0.1%
Adult	Local Bus / METRO	Rush Hour	U-Pass	\$1.51	\$1.51	-	-	4,032	1,561	2,472	39%	2,210	1,347	62%	1.8%	1.6%	2.9%
Adult	Local Bus / METRO	Rush Hour	College Pass	\$2.12	\$2.00	-\$0.12	-5.7%	1,728	766	962	44%	1,004	519	66%	0.8%	0.8%	1.3%
Adult	Local Bus / METRO	Rush Hour	Student Pass	\$1.22	\$1.22	-	-	2,821	2,258	564	80%	1,082	466	70%	1.2%	2.2%	1.4%
Adult	Local Bus / METRO	Rush Hour	10-Ride Pass	\$1.60	\$1.60	-	-	308	143	165	47%	66	160	29%	0.1%	0.1%	0.1%
Adult	Local Bus / METRO	Rush Hour	Veteran	\$0.00	\$0.00	-	-	272	121	151	44%	124	136	48%	0.1%	0.1%	0.2%
Adult	Local Bus / METRO	Rush Hour	Token	\$0.00	\$0.00	-	-	178	123	55	69%	99	29	77%	0.1%	0.1%	0.1%
Adult	Express Bus	Non-Rush Hour	Cash or Similar	\$2.50	\$3.00	\$0.50	20.0%	7,358	2,361	4,997	32%	910	5,928	13%	3.2%	2.3%	1.2%
Adult	Express Bus	Non-Rush Hour	Metropass	\$2.50	\$3.00	\$0.50	20.0%	11,115	1,571	9,544	14%	198	9,875	2%	4.8%	1.6%	0.3%
Adult	Express Bus	Non-Rush Hour	Employee Pass	\$2.50	\$3.00	\$0.50	20.0%	26	6	20	23%	0	24	0%	0.0%	0.0%	0.0%
Adult	Express Bus	Non-Rush Hour	U-Pass	\$1.51	\$1.51	-	-	1,132	350	782	31%	240	844	22%	0.5%	0.3%	0.3%
Adult	Express Bus	Non-Rush Hour	College Pass	\$2.12	\$2.12	-	-	196	92	104	47%	119	50	70%	0.1%	0.1%	0.2%
Adult	Express Bus	Non-Rush Hour	Student Pass	\$1.22	\$1.22	-	-	213	162	52	76%	65	121	35%	0.1%	0.2%	0.1%
Adult	Express Bus	Non-Rush Hour	10-Ride Pass	\$1.60	\$1.60	-	-	65	31	35	47%	9	56	14%	0.0%	0.0%	0.0%
Adult	Express Bus	Non-Rush Hour	Veteran	\$0.00	\$0.00	-	-	123	30	93	24%	0	115	0%	0.1%	0.0%	0.0%
Adult	Express Bus	Non-Rush Hour	Token	\$0.00	\$0.00	-	-	37	2	35	6%	20	18	53%	0.0%	0.0%	0.0%
Adult	Express Bus	Rush Hour	Cash or Similar	\$3.25	\$3.00	-\$0.25	-7.7%	5,066	1,387	3,679	27%	240	4,383	5%	2.2%	1.4%	0.3%
Adult	Express Bus	Rush Hour	Metropass	\$3.22	\$3.00	-\$0.22	-6.8%	11,021	1,545	9,476	14%	221	9,701	2%	4.8%	1.5%	0.3%
Adult	Express Bus	Rush Hour	Employee Pass	\$3.22	\$3.00	-\$0.22	-6.8%	13	0	13	0%	0	12	0%	0.0%	0.0%	0.0%
Adult	Express Bus	Rush Hour	U-Pass	\$1.51	\$1.51	-	-	789	453	337	57%	169	510	25%	0.3%	0.5%	0.2%
Adult	Express Bus	Rush Hour	College Pass	\$2.12	\$2.12	-	-	141	79	61	56%	38	93	29%	0.1%	0.1%	0.1%
Adult	Express Bus	Rush Hour	Student Pass	\$1.22	\$1.22	-	-	161	109	52	68%	106	45	70%	0.1%	0.1%	0.1%
Adult	Express Bus	Rush Hour	10-Ride Pass	\$1.60	\$1.60	-	-	37	13	23	36%	1	36	2%	0.0%	0.0%	0.0%
Adult	Express Bus	Rush Hour	Veteran	\$0.00	\$0.00	-	-	69	1	67	2%	0	61	0%	0.0%	0.0%	0.0%
Reduced Fare	Local Bus / METRO	Non-Rush Hour	Cash or Similar	\$1.00	\$1.00	-	-	4,982	1,262	3,721	25%	1,410	2,535	36%	2.2%	1.3%	1.8%
Reduced Fare	Local Bus / METRO	Non-Rush Hour	Metropass	\$1.00	\$1.00	-	-	450	60	390	13%	108	227	32%	0.2%	0.1%	0.1%
Reduced Fare	Local Bus / METRO	Non-Rush Hour	Employee Pass	\$1.00	\$1.00	-	-	15	0	15	0%	0	15	0%	0.0%	0.0%	0.0%
Reduced Fare	Local Bus / METRO	Non-Rush Hour	U-Pass	\$1.00	\$1.00	-	-	39	2	37	5%	22	11	67%	0.0%	0.0%	0.0%
Reduced Fare	Local Bus / METRO	Non-Rush Hour	College Pass	\$1.00	\$1.00	-	-	3	0	3	0%	3	0	100%	0.0%	0.0%	0.0%
Reduced Fare	Local Bus / METRO	Non-Rush Hour	Student Pass	\$1.00	\$1.00	-	-	20	8	12	40%	8	6	57%	0.0%	0.0%	0.0%

Fare Type	Service Type	Time of Day	Payment Method	Existing Fare per Trip	Proposed Fare per Trip	Absolute Change	Percent Change	Total Riders	BIPOC Riders	White Riders	Percent BIPOC Riders	Low-Income Riders	Non-Low-Income Riders	Percent Low-Income Riders	Percent of Total Riders	Percent of all BIPOC Riders	Percent of all Low-Income Riders	
Reduced Fare	Local Bus / METRO	Non-Rush Hour	10-Ride Pass	\$1.00	\$1.00	-	-	30	11	19	37%	27	3	91%	0.0%	0.0%	0.0%	
Reduced Fare	Local Bus / METRO	Non-Rush Hour	Veteran	\$0.00	\$0.00	-	-	307	61	247	20%	53	219	20%	0.1%	0.1%	0.1%	
Reduced Fare	Local Bus / METRO	Non-Rush Hour	Token	\$0.00	\$0.00	-	-	24	24	0	100%	24	0	100%	0.0%	0.0%	0.0%	
Reduced Fare	Local Bus / METRO	Rush Hour	Cash or Similar	\$2.50	\$1.00	-\$1.50	-60.0%	1,238	296	941	24%	363	650	36%	0.5%	0.3%	0.5%	
Reduced Fare	Local Bus / METRO	Rush Hour	Metropass	\$2.50	\$1.00	-\$1.50	-60.0%	43	2	41	4%	7	41	14%	0.0%	0.0%	0.0%	
Reduced Fare	Local Bus / METRO	Rush Hour	Employee Pass	\$2.50	\$1.00	-\$1.50	-60.0%	14	0	14	0%	0	14	0%	0.0%	0.0%	0.0%	
Reduced Fare	Local Bus / METRO	Rush Hour	U-Pass	\$1.51	\$1.00	-\$0.51	-33.8%	13	10	4	72%	2	10	15%	0.0%	0.0%	0.0%	
Reduced Fare	Local Bus / METRO	Rush Hour	College Pass	\$2.12	\$1.00	-\$1.12	-52.8%	11	0	11	0%	0	11	0%	0.0%	0.0%	0.0%	
Reduced Fare	Local Bus / METRO	Rush Hour	Student Pass	\$1.22	\$1.00	-\$0.22	-18.0%	49	22	26	46%	29	0	100%	0.0%	0.0%	0.0%	
Reduced Fare	Local Bus / METRO	Rush Hour	Veteran	\$0.00	\$0.00	-	-	100	17	83	17%	27	33	44%	0.0%	0.0%	0.0%	
Reduced Fare	Express Bus	Non-Rush Hour	Cash or Similar	\$1.00	\$1.00	-	-	390	35	355	9%	25	301	8%	0.2%	0.0%	0.0%	
Reduced Fare	Express Bus	Non-Rush Hour	Metropass	\$1.00	\$1.00	-	-	109	1	108	1%	0	96	0%	0.0%	0.0%	0.0%	
Reduced Fare	Express Bus	Non-Rush Hour	U-Pass	\$1.00	\$1.00	-	-	14	0	14	0%	0	14	0%	0.0%	0.0%	0.0%	
Reduced Fare	Express Bus	Rush Hour	Cash or Similar	\$3.25	\$1.00	-\$2.25	-69.2%	70	7	63	10%	10	61	14%	0.0%	0.0%	0.0%	
Reduced Fare	Express Bus	Rush Hour	Metropass	\$3.22	\$1.00	-\$2.22	-68.9%	86	0	86	0%	0	56	0%	0.0%	0.0%	0.0%	
Reduced Fare	Express Bus	Rush Hour	10-Ride Pass	\$1.60	\$1.00	-\$0.60	-37.5%	6	0	6	0%	0	6	0%	0.0%	0.0%	0.0%	
Mobility Fare	Local Bus / METRO	Non-Rush Hour	Cash or Similar	\$1.00	\$1.00	-	-	3,520	1,528	1,993	43%	2,282	660	78%	1.5%	1.5%	3.0%	
Mobility Fare	Local Bus / METRO	Non-Rush Hour	Metropass	\$1.00	\$1.00	-	-	118	67	51	57%	82	30	73%	0.1%	0.1%	0.1%	
Mobility Fare	Local Bus / METRO	Non-Rush Hour	U-Pass	\$1.00	\$1.00	-	-	29	9	20	32%	29	0	100%	0.0%	0.0%	0.0%	
Mobility Fare	Local Bus / METRO	Non-Rush Hour	College Pass	\$1.00	\$1.00	-	-	43	37	6	85%	33	11	75%	0.0%	0.0%	0.0%	
Mobility Fare	Local Bus / METRO	Non-Rush Hour	10-Ride Pass	\$1.00	\$1.00	-	-	3	3	0	100%	3	0	100%	0.0%	0.0%	0.0%	
Mobility Fare	Local Bus / METRO	Non-Rush Hour	Veteran	\$0.00	\$0.00	-	-	370	168	202	45%	204	107	66%	0.2%	0.2%	0.3%	
Mobility Fare	Local Bus / METRO	Non-Rush Hour	Token	\$0.00	\$0.00	-	-	40	33	7	83%	37	3	93%	0.0%	0.0%	0.0%	
Mobility Fare	Local Bus / METRO	Rush Hour	Cash or Similar	\$1.00	\$1.00	-	-	1,024	417	607	41%	697	161	81%	0.4%	0.4%	0.9%	
Mobility Fare	Local Bus / METRO	Rush Hour	Metropass	\$1.00	\$1.00	-	-	112	72	39	65%	33	13	72%	0.0%	0.1%	0.0%	
Mobility Fare	Local Bus / METRO	Rush Hour	U-Pass	\$1.00	\$1.00	-	-	12	0	12	0%	12	0	100%	0.0%	0.0%	0.0%	
Mobility Fare	Local Bus / METRO	Rush Hour	10-Ride Pass	\$1.00	\$1.00	-	-	6	6	0	100%	6	0	100%	0.0%	0.0%	0.0%	
Mobility Fare	Local Bus / METRO	Rush Hour	Veteran	\$0.00	\$0.00	-	-	156	79	76	51%	86	62	58%	0.1%	0.1%	0.1%	
Mobility Fare	Express Bus	Non-Rush Hour	Cash or Similar	\$1.00	\$1.00	-	-	157	24	133	16%	27	127	17%	0.1%	0.0%	0.0%	
Mobility Fare	Express Bus	Non-Rush Hour	Metropass	\$1.00	\$1.00	-	-	38	2	36	6%	2	21	9%	0.0%	0.0%	0.0%	
Mobility Fare	Express Bus	Non-Rush Hour	U-Pass	\$1.00	\$1.00	-	-	2	0	2	0%	2	0	100%	0.0%	0.0%	0.0%	
Mobility Fare	Express Bus	Non-Rush Hour	Veteran	\$0.00	\$0.00	-	-	6	0	6	0%	0	6	0%	0.0%	0.0%	0.0%	
Mobility Fare	Express Bus	Rush Hour	Cash or Similar	\$1.00	\$1.00	-	-	136	64	72	47%	81	42	66%	0.1%	0.1%	0.1%	
Mobility Fare	Express Bus	Rush Hour	Metropass	\$1.00	\$1.00	-	-	26	0	26	0%	8	18	29%	0.0%	0.0%	0.0%	
Mobility Fare	Express Bus	Rush Hour	U-Pass	\$1.00	\$1.00	-	-	6	6	0	100%	6	0	100%	0.0%	0.0%	0.0%	
Mobility Fare	Express Bus	Rush Hour	10-Ride Pass	\$1.00	\$1.00	-	-	3	3	0	100%	3	0	100%	0.0%	0.0%	0.0%	
TAP	All	All	TAP Card	\$1.00	\$1.00	-	-	5,962	3,682	2,281	62%	5,087	0	100%	2.6%	3.7%	6.7%	
								Total	229,326	100,519	128,807	43.8%	76,338	119,329	39.0%	100.0%	100.0%	100.0%
								Impacted	43,227	19,400	23,827	44.9%	12,949	23,902	35.1%	18.8%	19.3%	17.0%

Step 2: Calculate Average Fares

Table 10 shows the average fare per trip (regardless of fare combination) under the existing and proposed fare structures for all riders, BIPOC riders, white riders, low-income riders, and non-low-income riders under change Scenario 1. These represent rider-weighted averages based on fare values and the number of riders from Table 9.

The percent changes in average fare per trip from Table 10 are then used in Step 3 to determine disparate impact and disproportionate burden.

Table 10. Average Fare per Trip by Rider Group, Scenario 1

	All Riders	Minority Riders	Non-Minority Riders	Low-Income Riders	Non-Low-Income Riders
Impacted Riders	--	--	--	--	--
Count	43,227	19,400	23,827	12,949	23,902
Percent of total	18.8%	19.3%	18.5%	17.0%	20.0%
Percent makeup	--	44.9%	55.1%	35.1%	64.9%
Average Fare per Trip	--	--	--	--	--
Existing Fare	\$2.04	\$1.95	\$2.11	\$1.83	\$2.21
Proposed Fare	\$1.94	\$1.85	\$2.01	\$1.74	\$2.10
Absolute Change	-\$0.10	-\$0.10	-\$0.10	-\$0.08	-\$0.11
Percent Change	-4.81%	-4.96%	-4.70%	-4.65%	-4.80%
Comparison Index*	--	1.05	--	0.97	--

*Example: $-4.65\% / -4.80\% = 0.97$

Note: Any apparent errors in the change or difference values are due to rounding.

Step 3: Compare Changes

Applying Metro Transit's existing disparate impact policy (see page 45), the ratio between the percent decrease in average fare for BIPOC riders and the percent decrease in average fare for white riders must be greater than or equal to 0.80 to avoid disparate impact to BIPOC riders; this calculation is otherwise known as the **comparison index**. The same framework applies for the determination of disproportionate burden on low-income riders.

As shown in Table 10, on average, BIPOC riders would experience a 4.96% decrease in fare paid per trip under Scenario 1 proposed fare changes compared to existing fares. This fare decrease is greater than that for the average white rider, who would experience a 4.70% decrease. The resulting comparison index is 1.05. Therefore, per Metro Transit Title VI policies, this analysis identified **no disparate impact on BIPOC riders** as a result of the Scenario 1 proposed fare changes.

On average, low-income riders would experience a 4.65% decrease in fare paid per trip – a slightly smaller decrease than that for the average non-low-income rider, who would experience a 4.80%

decrease (Table 10). However, the resulting comparison index of 0.97 is greater than the 0.80 threshold for disproportionate burden. Therefore, per Metro Transit Title VI policies, this analysis identified **no disproportionate burden on low-income riders** as a result of the Scenario 1 proposed fare changes.

Given the findings of no disparate impact on BIPOC riders and no disproportionate burden on low-income riders, there is no need to continue to Step 4 of the analysis: Explore alternatives to avoid, minimize, or mitigate disparate impacts or disproportionate burdens.

Scenario 2

Proposed changes

The proposed package of changes under Scenario 2 are show in Table 11 and summarized below.

- Eliminate the Rush-Hour surcharge for Reduced Fare riders, resulting in a \$1.00 fare at all times of day on both Local Bus / METRO and Express Bus service types
- Eliminate the Rush-Hour surcharge for the Adult fare type, resulting in a \$2.00 fare at all times of day on Local Bus / METRO service and a \$3.00 fare at all times of day on Express Bus service

Table 11. Existing and Proposed Fares, Scenario 2

Fare Type	Service Type	Time of Day [^]	Existing Fare	Proposed Fare	Absolute Change	Percent Change
Adult*	Local Bus / METRO	Non-Rush Hour	\$2.00	\$2.00	--	--
Adult*	Local Bus / METRO	Rush Hour	\$2.50	\$2.00	-\$0.50	-20.0%
Adult*	Express Bus	Non-Rush Hour	\$2.50	\$3.00	+\$0.50	+20.0%
Adult*	Express Bus	Rush Hour	\$3.25	\$3.00	-\$0.25	-7.7%
Reduced Fare**	Local Bus / METRO	Non-Rush Hour	\$1.00	\$1.00	--	--
Reduced Fare**	Local Bus / METRO	Rush Hour	\$2.50	\$1.00	-\$1.50	-60.0%
Reduced Fare**	Express Bus	Non-Rush Hour	\$1.00	\$1.00	--	--
Reduced Fare**	Express Bus	Rush Hour	\$3.25	\$1.00	-\$2.25	-69.2%
Mobility Fare	All	All	\$1.00	\$1.00	--	--
Downtown Zone	All	All	\$0.50	\$0.50	--	--
Downtown Zone: Nicollet Mall	All	All	\$0.00	\$0.00	--	--
Transit Assistance Program	All	All	\$1.00	\$1.00	--	--

*Ages 13-64

**Youth (ages 6-12), Seniors (ages 65+), and Medicare card holders

[^]Rush hour defined as Monday - Friday, 6-9 am and 3-6:30 pm

Step 1: Determine Fare Use

Table 12 summarizes the riders impacted by the fare changes proposed in Scenario 2. Similarly, but in much greater detail, Table 13 lists the 78 unique fare combinations of fare type, service type, time of day, and payment method that impact fare value. The fare combinations are presented alongside the

current and proposed per-trip fare value, and the number and percent of users of each unique fare combination, including a breakdown by BIPOC riders, white riders, low-income riders, and non-low-income riders. The values from this table are used to calculate the average existing fare and average proposed fare for each rider group (Step 2).

Table 12. Impacted Riders, Scenario 2

Group	Percent of Total Riders	Percent of all BIPOC Riders	Percent of all Low-Income Riders	Percent BIPOC Riders	Percent Low-Income Riders
Impacted by change	34.1%	26.3%	19.1%	33.8%	21.3%
Fare Increase	8.1%	3.9%	1.5%	21.4%	6.6%
Fare Decrease	26.0%	22.4%	17.7%	37.7%	26.1%
Regional system	100%	100%	100%	43.8%	39.0%

*Impacted by change percentage minus regional system percentage
 Note: Any apparent errors in the sum of percentage values are due to rounding

About one in three regional riders would be impacted under Scenario 2 - more than the one in five impacted under Scenario 1. This is the result of expanding the proposed fare change to include all Adult - Express Bus fares. As shown in Table 11, this change would increase the Adult - Express Bus - Non-Rush-Hour - fare by \$0.50, or 20%.

Importantly, those who would experience a fare increase are notably whiter and higher income than the regional average. Under Scenario 2:

- 3.9% of all regional BIPOC riders and 1.5% of all regional low-income riders would experience a fare increase (Table 12). Conversely, the percent of all regional white riders (11.3%) and all regional non-low-income riders (13.3%) with a fare increase would be notably higher.
- Among riders who would experience a fare increase, the percent BIPOC riders (21.4%) is about half of the percent BIPOC riders region-wide (43.8%). The gap is even wider for low-income riders; just 6.6% of those with a fare increase are low-income riders, which is much lower than the regional average of 39.0% low-income.

Understanding who is impacted provides important context for interpreting the results of this analysis. However, representation alone does not determine disparate impact on BIPOC riders or disproportionate burden on low-income riders according to the Metro Transit’s policy. Rather, these determinations are based on a combination of who is impacted and by how much their fare changes - or the magnitude of the impact - which is reflected in the rider-weighted average fare calculations completed in Step 2.

Table 13. Existing and Proposed Unique Fare Combinations by Rider Group, Scenario 2

Existing and proposed per-trip fares incorporate payment method and relevant per-trip assumptions for multiple-ride passes (see Appendix A)

Fare Type	Service Type	Time of Day	Payment Method	Existing Fare per Trip	Proposed Fare per Trip	Absolute Change	Percent Change	Total Riders	BIPOC Riders	White Riders	Percent BIPOC Riders	Low-Income Riders	Non-Low-Income Riders	Percent Low-Income Riders	Percent of Total Riders	Percent of all BIPOC Riders	Percent of all Low-Income Riders
Adult	Local Bus / METRO	Non-Rush Hour	Cash or Similar	\$2.00	\$2.00	-	-	86,276	44,603	41,673	52%	32,321	41,470	44%	37.6%	44.4%	42.3%
Adult	Local Bus / METRO	Non-Rush Hour	Metropass	\$2.00	\$2.00	-	-	10,494	2,794	7,701	27%	1,586	7,913	17%	4.6%	2.8%	2.1%
Adult	Local Bus / METRO	Non-Rush Hour	Employee Pass	\$2.00	\$2.00	-	-	243	132	111	54%	30	186	14%	0.1%	0.1%	0.0%
Adult	Local Bus / METRO	Non-Rush Hour	U-Pass	\$1.51	\$1.51	-	-	12,267	5,002	7,265	41%	6,633	3,860	63%	5.3%	5.0%	8.7%
Adult	Local Bus / METRO	Non-Rush Hour	College Pass	\$2.00	\$2.00	-	-	4,721	2,359	2,362	50%	2,821	1,098	72%	2.1%	2.3%	3.7%
Adult	Local Bus / METRO	Non-Rush Hour	Student Pass	\$1.22	\$1.22	-	-	6,278	4,669	1,609	74%	2,372	1,436	62%	2.7%	4.6%	3.1%
Adult	Local Bus / METRO	Non-Rush Hour	10-Ride Pass	\$1.60	\$1.60	-	-	779	478	301	61%	464	210	69%	0.3%	0.5%	0.6%
Adult	Local Bus / METRO	Non-Rush Hour	Veteran	\$0.00	\$0.00	-	-	1,005	525	480	52%	482	394	55%	0.4%	0.5%	0.6%
Adult	Local Bus / METRO	Non-Rush Hour	Token	\$0.00	\$0.00	-	-	609	477	131	78%	336	128	72%	0.3%	0.5%	0.4%
Adult	Local Bus / METRO	Rush Hour	Cash or Similar	\$2.50	\$2.00	-\$0.50	-20.0%	33,763	16,580	17,183	49%	10,853	17,704	38%	14.7%	16.5%	14.2%
Adult	Local Bus / METRO	Rush Hour	Metropass	\$2.50	\$2.00	-\$0.50	-20.0%	6,002	1,632	4,370	27%	633	4,747	12%	2.6%	1.6%	0.8%
Adult	Local Bus / METRO	Rush Hour	Employee Pass	\$2.50	\$2.00	-\$0.50	-20.0%	205	86	120	42%	49	85	37%	0.1%	0.1%	0.1%
Adult	Local Bus / METRO	Rush Hour	U-Pass	\$1.51	\$1.51	-	-	4,032	1,561	2,472	39%	2,210	1,347	62%	1.8%	1.6%	2.9%
Adult	Local Bus / METRO	Rush Hour	College Pass	\$2.12	\$2.00	-\$0.12	-5.7%	1,728	766	962	44%	1,004	519	66%	0.8%	0.8%	1.3%
Adult	Local Bus / METRO	Rush Hour	Student Pass	\$1.22	\$1.22	-	-	2,821	2,258	564	80%	1,082	466	70%	1.2%	2.2%	1.4%
Adult	Local Bus / METRO	Rush Hour	10-Ride Pass	\$1.60	\$1.60	-	-	308	143	165	47%	66	160	29%	0.1%	0.1%	0.1%
Adult	Local Bus / METRO	Rush Hour	Veteran	\$0.00	\$0.00	-	-	272	121	151	44%	124	136	48%	0.1%	0.1%	0.2%
Adult	Local Bus / METRO	Rush Hour	Token	\$0.00	\$0.00	-	-	178	123	55	69%	99	29	77%	0.1%	0.1%	0.1%
Adult	Express Bus	Non-Rush Hour	Cash or Similar	\$2.50	\$3.00	\$0.50	20.0%	7,358	2,361	4,997	32%	910	5,928	13%	3.2%	2.3%	1.2%
Adult	Express Bus	Non-Rush Hour	Metropass	\$2.50	\$3.00	\$0.50	20.0%	11,115	1,571	9,544	14%	198	9,875	2%	4.8%	1.6%	0.3%
Adult	Express Bus	Non-Rush Hour	Employee Pass	\$2.50	\$3.00	\$0.50	20.0%	26	6	20	23%	0	24	0%	0.0%	0.0%	0.0%
Adult	Express Bus	Non-Rush Hour	U-Pass	\$1.51	\$1.51	-	-	1,132	350	782	31%	240	844	22%	0.5%	0.3%	0.3%
Adult	Express Bus	Non-Rush Hour	College Pass	\$2.12	\$2.12	-	-	196	92	104	47%	119	50	70%	0.1%	0.1%	0.2%
Adult	Express Bus	Non-Rush Hour	Student Pass	\$1.22	\$1.22	-	-	213	162	52	76%	65	121	35%	0.1%	0.2%	0.1%
Adult	Express Bus	Non-Rush Hour	10-Ride Pass	\$1.60	\$1.60	-	-	65	31	35	47%	9	56	14%	0.0%	0.0%	0.0%
Adult	Express Bus	Non-Rush Hour	Veteran	\$0.00	\$0.00	-	-	123	30	93	24%	0	115	0%	0.1%	0.0%	0.0%
Adult	Express Bus	Non-Rush Hour	Token	\$0.00	\$0.00	-	-	37	2	35	6%	20	18	53%	0.0%	0.0%	0.0%
Adult	Express Bus	Rush Hour	Cash or Similar	\$3.25	\$3.00	-\$0.25	-7.7%	5,066	1,387	3,679	27%	240	4,383	5%	2.2%	1.4%	0.3%
Adult	Express Bus	Rush Hour	Metropass	\$3.22	\$3.00	-\$0.22	-6.8%	11,021	1,545	9,476	14%	221	9,701	2%	4.8%	1.5%	0.3%
Adult	Express Bus	Rush Hour	Employee Pass	\$3.22	\$3.00	-\$0.22	-6.8%	13	0	13	0%	0	12	0%	0.0%	0.0%	0.0%
Adult	Express Bus	Rush Hour	U-Pass	\$1.51	\$1.51	-	-	789	453	337	57%	169	510	25%	0.3%	0.5%	0.2%
Adult	Express Bus	Rush Hour	College Pass	\$2.12	\$2.12	-	-	141	79	61	56%	38	93	29%	0.1%	0.1%	0.1%
Adult	Express Bus	Rush Hour	Student Pass	\$1.22	\$1.22	-	-	161	109	52	68%	106	45	70%	0.1%	0.1%	0.1%
Adult	Express Bus	Rush Hour	10-Ride Pass	\$1.60	\$1.60	-	-	37	13	23	36%	1	36	2%	0.0%	0.0%	0.0%
Adult	Express Bus	Rush Hour	Veteran	\$0.00	\$0.00	-	-	69	1	67	2%	0	61	0%	0.0%	0.0%	0.0%
Reduced Fare	Local Bus / METRO	Non-Rush Hour	Cash or Similar	\$1.00	\$1.00	-	-	4,982	1,262	3,721	25%	1,410	2,535	36%	2.2%	1.3%	1.8%
Reduced Fare	Local Bus / METRO	Non-Rush Hour	Metropass	\$1.00	\$1.00	-	-	450	60	390	13%	108	227	32%	0.2%	0.1%	0.1%
Reduced Fare	Local Bus / METRO	Non-Rush Hour	Employee Pass	\$1.00	\$1.00	-	-	15	0	15	0%	0	15	0%	0.0%	0.0%	0.0%
Reduced Fare	Local Bus / METRO	Non-Rush Hour	U-Pass	\$1.00	\$1.00	-	-	39	2	37	5%	22	11	67%	0.0%	0.0%	0.0%
Reduced Fare	Local Bus / METRO	Non-Rush Hour	College Pass	\$1.00	\$1.00	-	-	3	0	3	0%	3	0	100%	0.0%	0.0%	0.0%
Reduced Fare	Local Bus / METRO	Non-Rush Hour	Student Pass	\$1.00	\$1.00	-	-	20	8	12	40%	8	6	57%	0.0%	0.0%	0.0%

Fare Type	Service Type	Time of Day	Payment Method	Existing Fare per Trip	Proposed Fare per Trip	Absolute Change	Percent Change	Total Riders	BIPOC Riders	White Riders	Percent BIPOC Riders	Low-Income Riders	Non-Low-Income Riders	Percent Low-Income Riders	Percent of Total Riders	Percent of all BIPOC Riders	Percent of all Low-Income Riders	
Reduced Fare	Local Bus / METRO	Non-Rush Hour	10-Ride Pass	\$1.00	\$1.00	-	-	30	11	19	37%	27	3	91%	0.0%	0.0%	0.0%	
Reduced Fare	Local Bus / METRO	Non-Rush Hour	Veteran	\$0.00	\$0.00	-	-	307	61	247	20%	53	219	20%	0.1%	0.1%	0.1%	
Reduced Fare	Local Bus / METRO	Non-Rush Hour	Token	\$0.00	\$0.00	-	-	24	24	0	100%	24	0	100%	0.0%	0.0%	0.0%	
Reduced Fare	Local Bus / METRO	Rush Hour	Cash or Similar	\$2.50	\$1.00	-\$1.50	-60.0%	1,238	296	941	24%	363	650	36%	0.5%	0.3%	0.5%	
Reduced Fare	Local Bus / METRO	Rush Hour	Metropass	\$2.50	\$1.00	-\$1.50	-60.0%	43	2	41	4%	7	41	14%	0.0%	0.0%	0.0%	
Reduced Fare	Local Bus / METRO	Rush Hour	Employee Pass	\$2.50	\$1.00	-\$1.50	-60.0%	14	0	14	0%	0	14	0%	0.0%	0.0%	0.0%	
Reduced Fare	Local Bus / METRO	Rush Hour	U-Pass	\$1.51	\$1.00	-\$0.51	-33.8%	13	10	4	72%	2	10	15%	0.0%	0.0%	0.0%	
Reduced Fare	Local Bus / METRO	Rush Hour	College Pass	\$2.12	\$1.00	-\$1.12	-52.8%	11	0	11	0%	0	11	0%	0.0%	0.0%	0.0%	
Reduced Fare	Local Bus / METRO	Rush Hour	Student Pass	\$1.22	\$1.00	-\$0.22	-18.0%	49	22	26	46%	29	0	100%	0.0%	0.0%	0.0%	
Reduced Fare	Local Bus / METRO	Rush Hour	Veteran	\$0.00	\$0.00	-	-	100	17	83	17%	27	33	44%	0.0%	0.0%	0.0%	
Reduced Fare	Express Bus	Non-Rush Hour	Cash or Similar	\$1.00	\$1.00	-	-	390	35	355	9%	25	301	8%	0.2%	0.0%	0.0%	
Reduced Fare	Express Bus	Non-Rush Hour	Metropass	\$1.00	\$1.00	-	-	109	1	108	1%	0	96	0%	0.0%	0.0%	0.0%	
Reduced Fare	Express Bus	Non-Rush Hour	U-Pass	\$1.00	\$1.00	-	-	14	0	14	0%	0	14	0%	0.0%	0.0%	0.0%	
Reduced Fare	Express Bus	Rush Hour	Cash or Similar	\$3.25	\$1.00	-\$2.25	-69.2%	70	7	63	10%	10	61	14%	0.0%	0.0%	0.0%	
Reduced Fare	Express Bus	Rush Hour	Metropass	\$3.22	\$1.00	-\$2.22	-68.9%	86	0	86	0%	0	56	0%	0.0%	0.0%	0.0%	
Reduced Fare	Express Bus	Rush Hour	10-Ride Pass	\$1.60	\$1.00	-\$0.60	-37.5%	6	0	6	0%	0	6	0%	0.0%	0.0%	0.0%	
Mobility Fare	Local Bus / METRO	Non-Rush Hour	Cash or Similar	\$1.00	\$1.00	-	-	3,520	1,528	1,993	43%	2,282	660	78%	1.5%	1.5%	3.0%	
Mobility Fare	Local Bus / METRO	Non-Rush Hour	Metropass	\$1.00	\$1.00	-	-	118	67	51	57%	82	30	73%	0.1%	0.1%	0.1%	
Mobility Fare	Local Bus / METRO	Non-Rush Hour	U-Pass	\$1.00	\$1.00	-	-	29	9	20	32%	29	0	100%	0.0%	0.0%	0.0%	
Mobility Fare	Local Bus / METRO	Non-Rush Hour	College Pass	\$1.00	\$1.00	-	-	43	37	6	85%	33	11	75%	0.0%	0.0%	0.0%	
Mobility Fare	Local Bus / METRO	Non-Rush Hour	10-Ride Pass	\$1.00	\$1.00	-	-	3	3	0	100%	3	0	100%	0.0%	0.0%	0.0%	
Mobility Fare	Local Bus / METRO	Non-Rush Hour	Veteran	\$0.00	\$0.00	-	-	370	168	202	45%	204	107	66%	0.2%	0.2%	0.3%	
Mobility Fare	Local Bus / METRO	Non-Rush Hour	Token	\$0.00	\$0.00	-	-	40	33	7	83%	37	3	93%	0.0%	0.0%	0.0%	
Mobility Fare	Local Bus / METRO	Rush Hour	Cash or Similar	\$1.00	\$1.00	-	-	1,024	417	607	41%	697	161	81%	0.4%	0.4%	0.9%	
Mobility Fare	Local Bus / METRO	Rush Hour	Metropass	\$1.00	\$1.00	-	-	112	72	39	65%	33	13	72%	0.0%	0.1%	0.0%	
Mobility Fare	Local Bus / METRO	Rush Hour	U-Pass	\$1.00	\$1.00	-	-	12	0	12	0%	12	0	100%	0.0%	0.0%	0.0%	
Mobility Fare	Local Bus / METRO	Rush Hour	10-Ride Pass	\$1.00	\$1.00	-	-	6	6	0	100%	6	0	100%	0.0%	0.0%	0.0%	
Mobility Fare	Local Bus / METRO	Rush Hour	Veteran	\$0.00	\$0.00	-	-	156	79	76	51%	86	62	58%	0.1%	0.1%	0.1%	
Mobility Fare	Express Bus	Non-Rush Hour	Cash or Similar	\$1.00	\$1.00	-	-	157	24	133	16%	27	127	17%	0.1%	0.0%	0.0%	
Mobility Fare	Express Bus	Non-Rush Hour	Metropass	\$1.00	\$1.00	-	-	38	2	36	6%	2	21	9%	0.0%	0.0%	0.0%	
Mobility Fare	Express Bus	Non-Rush Hour	U-Pass	\$1.00	\$1.00	-	-	2	0	2	0%	2	0	100%	0.0%	0.0%	0.0%	
Mobility Fare	Express Bus	Non-Rush Hour	Veteran	\$0.00	\$0.00	-	-	6	0	6	0%	0	6	0%	0.0%	0.0%	0.0%	
Mobility Fare	Express Bus	Rush Hour	Cash or Similar	\$1.00	\$1.00	-	-	136	64	72	47%	81	42	66%	0.1%	0.1%	0.1%	
Mobility Fare	Express Bus	Rush Hour	Metropass	\$1.00	\$1.00	-	-	26	0	26	0%	8	18	29%	0.0%	0.0%	0.0%	
Mobility Fare	Express Bus	Rush Hour	U-Pass	\$1.00	\$1.00	-	-	6	6	0	100%	6	0	100%	0.0%	0.0%	0.0%	
Mobility Fare	Express Bus	Rush Hour	10-Ride Pass	\$1.00	\$1.00	-	-	3	3	0	100%	3	0	100%	0.0%	0.0%	0.0%	
TAP	All	All	TAP Card	\$1.00	\$1.00	-	-	5,962	3,682	2,281	62%	5,087	0	100%	2.6%	3.7%	6.7%	
								Total	229,326	100,519	128,807	43.8%	76,338	119,329	39.0%	100.0%	100.0%	100.0%
								Impacted	78,237	26,458	51,778	33.8%	14,593	54,077	21.3%	34.1%	26.3%	19.1%
								Increase	18,564	3,969	14,595	21.4%	1,117	15,883	6.6%	8.1%	3.9%	1.5%
								Decrease	59,673	22,490	37,183	37.7%	13,475	38,194	26.1%	26.0%	22.4%	17.7%

Step 2: Calculate Average Fares

Table 14 shows the average fare per trip (regardless of fare combination) under the existing and proposed fare structures for all riders, BIPOC riders, white riders, low-income riders, and non-low-income riders under change Scenario 2. These represent rider-weighted averages based on fare values and the number of riders from Table 13.

The percent changes in average fare per trip from Table 14 are then used in Step 3 to determine disparate impact and disproportionate burden.

Table 14. Average Fare per Trip by Rider Group, Scenario 2

	All Riders	Minority Riders	Non-Minority Riders	Low-Income Riders	Non-Low-Income Riders
Impacted Riders	--	--	--	--	--
Count	78,237	26,458	51,778	14,593	54,077
Percent of total	34.1%	26.3%	40.2%	19.1%	45.3%
Percent makeup	--	33.8%	66.2%	21.3%	78.7%
Average Fare per Trip	--	--	--	--	--
Existing Fare	\$2.04	\$1.95	\$2.11	\$1.83	\$2.21
Proposed Fare	\$1.97	\$1.87	\$2.05	\$1.75	\$2.14
Absolute Change	-\$0.07	-\$0.08	-\$0.07	-\$0.08	-\$0.07
Percent Change	-3.62%	-4.30%	-3.13%	-4.33%	-3.03%
Comparison Index*	--	1.37	--	1.43	--

*Example: $-4.30\% / -3.13\% = 1.37$

Note: Any apparent errors in the change or difference values are due to rounding.

Step 3: Compare Changes

As shown in Table 14, on average, BIPOC riders would experience a 4.30% decrease in fare paid per trip under Scenario 2 compared to existing fares. This fare decrease is greater than that for the average white rider, who would experience a 3.13% decrease. The resulting comparison index is 1.37. Therefore, per Metro Transit Title VI policies, this analysis identified **no disparate impact on BIPOC riders** as a result of the Scenario 2 proposed fare changes.

On average, low-income riders would experience a 4.33% decrease in fare paid per trip – a greater decrease than that for the average non-low-income rider, who would experience a 3.03% decrease (Table 14). The resulting comparison index is 1.43; in other words, low-income riders receive 43% more benefit than non-low-income riders, on average. Therefore, per Metro Transit Title VI policies, this analysis identified **no disproportionate burden on low-income riders** as a result of the Scenario 2 proposed fare changes.

Given the findings of no disparate impact on BIPOC riders and no disproportionate burden on low-income riders, there is no need to continue to Step 4 of the analysis: Explore alternatives to avoid, minimize, or mitigate disparate impacts or disproportionate burdens.

Scenario 3

Proposed changes

The proposed package of changes under Scenario 3 are show in Table 15 and summarizes below.

- Eliminate the Rush-Hour surcharge for Reduced Fare riders, resulting in a \$1.00 fare at all times of day on both Local Bus / METRO and Express Bus service types

Table 15. Existing and Proposed Fares, Scenario 3

Fare Type	Service Type	Time of Day [^]	Existing Fare	Proposed Fare	Absolute Change	Percent Change
Adult*	Local Bus / METRO	Non-Rush Hour	\$2.00	\$2.00	--	--
Adult*	Local Bus / METRO	Rush Hour	\$2.50	\$2.00	--	--
Adult*	Express Bus	Non-Rush Hour	\$2.50	\$2.50	--	--
Adult*	Express Bus	Rush Hour	\$3.25	\$3.25	--	--
Reduced Fare**	Local Bus / METRO	Non-Rush Hour	\$1.00	\$1.00	--	--
Reduced Fare**	Local Bus / METRO	Rush Hour	\$2.50	\$1.00	-\$1.50	-60.0%
Reduced Fare**	Express Bus	Non-Rush Hour	\$1.00	\$1.00	--	--
Reduced Fare**	Express Bus	Rush Hour	\$3.25	\$1.00	-\$2.25	-69.2%
Mobility Fare	All	All	\$1.00	\$1.00	--	--
Downtown Zone	All	All	\$0.50	\$0.50	--	--
Downtown Zone: Nicollet Mall	All	All	\$0.00	\$0.00	--	--
Transit Assistance Program	All	All	\$1.00	\$1.00	--	--

*Ages 13-64

**Youth (ages 6-12), Seniors (ages 65+), and Medicare card holders

[^]Rush hour defined as Monday - Friday, 6-9 am and 3-6:30 pm

Step 1: Determine Fare Use

Table 16 summarizes the riders impacted by the fare changes proposed in Scenario 3. Relative to regional totals and the other scenarios, Scenario 3 would impact very few riders - just 0.7% (less than 1%). Additionally, BIPOC riders and low-income riders are underrepresented among users of the unique fare combinations being proposed for a fare decrease - that is, Reduced Fare - Rush Hour fares, regardless of service type. Among those impacted, the percent BIPOC riders (22.0%) is half the regional system average (43.8%), while the percent low-income riders (32.6%) is also below the regional system average (39.0%).

Again, representation alone does not determine disparate impact on BIPOC riders or disproportionate burden on low-income riders according to Metro Transit’s policy. However, these dynamics are key drivers of the rider-weighted average fare calculations that are used to determine disparate impact and disproportionate burden.

Table 16. Impacted Riders, Scenario 3

Group	Percent of Total Riders	Percent of all BIPOC Riders	Percent of all Low-Income Riders	Percent BIPOC Riders	Percent Low-Income Riders
Impacted by change (Fare decrease)	0.7%	0.3%	0.5%	22.0%	32.6%
Regional system	100%	100%	100%	43.8%	39.0%
Difference	--	--	--	-21.8%	-6.4%

Table 17 lists the 78 unique fare combinations of fare type, service type, time of day, and payment method that impact fare value. The fare combinations are presented alongside the current and proposed per-trip fare value, and the number and percent of users of each unique fare combination, including a breakdown by BIPOC riders, white riders, low-income riders, and non-low-income riders. The values from this table are used to calculate the average existing fare and average proposed fare for each rider group (Step 2).

Table 17. Existing and Proposed Unique Fare Combinations by Rider Group, Scenario 3

Existing and proposed per-trip fares incorporate payment method and relevant per-trip assumptions for multiple-ride passes (see Appendix A)

Fare Type	Service Type	Time of Day	Payment Method	Existing Fare per Trip	Proposed Fare per Trip	Absolute Change	Percent Change	Total Riders	BIPOC Riders	White Riders	Percent BIPOC Riders	Low-Income Riders	Non-Low-Income Riders	Percent Low-Income Riders	Percent of Total Riders	Percent of all BIPOC Riders	Percent of all Low-Income Riders
Adult	Local Bus / METRO	Non-Rush Hour	Cash or Similar	\$2.00	\$2.00	-	-	86,276	44,603	41,673	52%	32,321	41,470	44%	37.6%	44.4%	42.3%
Adult	Local Bus / METRO	Non-Rush Hour	Metropass	\$2.00	\$2.00	-	-	10,494	2,794	7,701	27%	1,586	7,913	17%	4.6%	2.8%	2.1%
Adult	Local Bus / METRO	Non-Rush Hour	Employee Pass	\$2.00	\$2.00	-	-	243	132	111	54%	30	186	14%	0.1%	0.1%	0.0%
Adult	Local Bus / METRO	Non-Rush Hour	U-Pass	\$1.51	\$1.51	-	-	12,267	5,002	7,265	41%	6,633	3,860	63%	5.3%	5.0%	8.7%
Adult	Local Bus / METRO	Non-Rush Hour	College Pass	\$2.00	\$2.00	-	-	4,721	2,359	2,362	50%	2,821	1,098	72%	2.1%	2.3%	3.7%
Adult	Local Bus / METRO	Non-Rush Hour	Student Pass	\$1.22	\$1.22	-	-	6,278	4,669	1,609	74%	2,372	1,436	62%	2.7%	4.6%	3.1%
Adult	Local Bus / METRO	Non-Rush Hour	10-Ride Pass	\$1.60	\$1.60	-	-	779	478	301	61%	464	210	69%	0.3%	0.5%	0.6%
Adult	Local Bus / METRO	Non-Rush Hour	Veteran	\$0.00	\$0.00	-	-	1,005	525	480	52%	482	394	55%	0.4%	0.5%	0.6%
Adult	Local Bus / METRO	Non-Rush Hour	Token	\$0.00	\$0.00	-	-	609	477	131	78%	336	128	72%	0.3%	0.5%	0.4%
Adult	Local Bus / METRO	Rush Hour	Cash or Similar	\$2.50	\$2.50	-	-	33,763	16,580	17,183	49%	10,853	17,704	38%	14.7%	16.5%	14.2%
Adult	Local Bus / METRO	Rush Hour	Metropass	\$2.50	\$2.50	-	-	6,002	1,632	4,370	27%	633	4,747	12%	2.6%	1.6%	0.8%
Adult	Local Bus / METRO	Rush Hour	Employee Pass	\$2.50	\$2.50	-	-	205	86	120	42%	49	85	37%	0.1%	0.1%	0.1%
Adult	Local Bus / METRO	Rush Hour	U-Pass	\$1.51	\$1.51	-	-	4,032	1,561	2,472	39%	2,210	1,347	62%	1.8%	1.6%	2.9%
Adult	Local Bus / METRO	Rush Hour	College Pass	\$2.12	\$2.12	-	-	1,728	766	962	44%	1,004	519	66%	0.8%	0.8%	1.3%
Adult	Local Bus / METRO	Rush Hour	Student Pass	\$1.22	\$1.22	-	-	2,821	2,258	564	80%	1,082	466	70%	1.2%	2.2%	1.4%
Adult	Local Bus / METRO	Rush Hour	10-Ride Pass	\$1.60	\$1.60	-	-	308	143	165	47%	66	160	29%	0.1%	0.1%	0.1%
Adult	Local Bus / METRO	Rush Hour	Veteran	\$0.00	\$0.00	-	-	272	121	151	44%	124	136	48%	0.1%	0.1%	0.2%
Adult	Local Bus / METRO	Rush Hour	Token	\$0.00	\$0.00	-	-	178	123	55	69%	99	29	77%	0.1%	0.1%	0.1%
Adult	Express Bus	Non-Rush Hour	Cash or Similar	\$2.50	\$2.50	-	-	7,358	2,361	4,997	32%	910	5,928	13%	3.2%	2.3%	1.2%
Adult	Express Bus	Non-Rush Hour	Metropass	\$2.50	\$2.50	-	-	11,115	1,571	9,544	14%	198	9,875	2%	4.8%	1.6%	0.3%
Adult	Express Bus	Non-Rush Hour	Employee Pass	\$2.50	\$2.50	-	-	26	6	20	23%	0	24	0%	0.0%	0.0%	0.0%
Adult	Express Bus	Non-Rush Hour	U-Pass	\$1.51	\$1.51	-	-	1,132	350	782	31%	240	844	22%	0.5%	0.3%	0.3%
Adult	Express Bus	Non-Rush Hour	College Pass	\$2.12	\$2.12	-	-	196	92	104	47%	119	50	70%	0.1%	0.1%	0.2%
Adult	Express Bus	Non-Rush Hour	Student Pass	\$1.22	\$1.22	-	-	213	162	52	76%	65	121	35%	0.1%	0.2%	0.1%
Adult	Express Bus	Non-Rush Hour	10-Ride Pass	\$1.60	\$1.60	-	-	65	31	35	47%	9	56	14%	0.0%	0.0%	0.0%
Adult	Express Bus	Non-Rush Hour	Veteran	\$0.00	\$0.00	-	-	123	30	93	24%	0	115	0%	0.1%	0.0%	0.0%
Adult	Express Bus	Non-Rush Hour	Token	\$0.00	\$0.00	-	-	37	2	35	6%	20	18	53%	0.0%	0.0%	0.0%
Adult	Express Bus	Rush Hour	Cash or Similar	\$3.25	\$3.25	-	-	5,066	1,387	3,679	27%	240	4,383	5%	2.2%	1.4%	0.3%
Adult	Express Bus	Rush Hour	Metropass	\$3.22	\$3.22	-	-	11,021	1,545	9,476	14%	221	9,701	2%	4.8%	1.5%	0.3%
Adult	Express Bus	Rush Hour	Employee Pass	\$3.22	\$3.22	-	-	13	0	13	0%	0	12	0%	0.0%	0.0%	0.0%
Adult	Express Bus	Rush Hour	U-Pass	\$1.51	\$1.51	-	-	789	453	337	57%	169	510	25%	0.3%	0.5%	0.2%
Adult	Express Bus	Rush Hour	College Pass	\$2.12	\$2.12	-	-	141	79	61	56%	38	93	29%	0.1%	0.1%	0.1%
Adult	Express Bus	Rush Hour	Student Pass	\$1.22	\$1.22	-	-	161	109	52	68%	106	45	70%	0.1%	0.1%	0.1%
Adult	Express Bus	Rush Hour	10-Ride Pass	\$1.60	\$1.60	-	-	37	13	23	36%	1	36	2%	0.0%	0.0%	0.0%
Adult	Express Bus	Rush Hour	Veteran	\$0.00	\$0.00	-	-	69	1	67	2%	0	61	0%	0.0%	0.0%	0.0%
Reduced Fare	Local Bus / METRO	Non-Rush Hour	Cash or Similar	\$1.00	\$1.00	-	-	4,982	1,262	3,721	25%	1,410	2,535	36%	2.2%	1.3%	1.8%
Reduced Fare	Local Bus / METRO	Non-Rush Hour	Metropass	\$1.00	\$1.00	-	-	450	60	390	13%	108	227	32%	0.2%	0.1%	0.1%
Reduced Fare	Local Bus / METRO	Non-Rush Hour	Employee Pass	\$1.00	\$1.00	-	-	15	0	15	0%	0	15	0%	0.0%	0.0%	0.0%
Reduced Fare	Local Bus / METRO	Non-Rush Hour	U-Pass	\$1.00	\$1.00	-	-	39	2	37	5%	22	11	67%	0.0%	0.0%	0.0%
Reduced Fare	Local Bus / METRO	Non-Rush Hour	College Pass	\$1.00	\$1.00	-	-	3	0	3	0%	3	0	100%	0.0%	0.0%	0.0%
Reduced Fare	Local Bus / METRO	Non-Rush Hour	Student Pass	\$1.00	\$1.00	-	-	20	8	12	40%	8	6	57%	0.0%	0.0%	0.0%

Fare Type	Service Type	Time of Day	Payment Method	Existing Fare per Trip	Proposed Fare per Trip	Absolute Change	Percent Change	Total Riders	BIPOC Riders	White Riders	Percent BIPOC Riders	Low-Income Riders	Non-Low-Income Riders	Percent Low-Income Riders	Percent of Total Riders	Percent of all BIPOC Riders	Percent of all Low-Income Riders	
Reduced Fare	Local Bus / METRO	Non-Rush Hour	10-Ride Pass	\$1.00	\$1.00	-	-	30	11	19	37%	27	3	91%	0.0%	0.0%	0.0%	
Reduced Fare	Local Bus / METRO	Non-Rush Hour	Veteran	\$0.00	\$0.00	-	-	307	61	247	20%	53	219	20%	0.1%	0.1%	0.1%	
Reduced Fare	Local Bus / METRO	Non-Rush Hour	Token	\$0.00	\$0.00	-	-	24	24	0	100%	24	0	100%	0.0%	0.0%	0.0%	
Reduced Fare	Local Bus / METRO	Rush Hour	Cash or Similar	\$2.50	\$1.00	-\$1.50	-60.0%	1,238	296	941	24%	363	650	36%	0.5%	0.3%	0.5%	
Reduced Fare	Local Bus / METRO	Rush Hour	Metropass	\$2.50	\$1.00	-\$1.50	-60.0%	43	2	41	4%	7	41	14%	0.0%	0.0%	0.0%	
Reduced Fare	Local Bus / METRO	Rush Hour	Employee Pass	\$2.50	\$1.00	-\$1.50	-60.0%	14	0	14	0%	0	14	0%	0.0%	0.0%	0.0%	
Reduced Fare	Local Bus / METRO	Rush Hour	U-Pass	\$1.51	\$1.00	-\$0.51	-33.8%	13	10	4	72%	2	10	15%	0.0%	0.0%	0.0%	
Reduced Fare	Local Bus / METRO	Rush Hour	College Pass	\$2.12	\$1.00	-\$1.12	-52.8%	11	0	11	0%	0	11	0%	0.0%	0.0%	0.0%	
Reduced Fare	Local Bus / METRO	Rush Hour	Student Pass	\$1.22	\$1.00	-\$0.22	-18.0%	49	22	26	46%	29	0	100%	0.0%	0.0%	0.0%	
Reduced Fare	Local Bus / METRO	Rush Hour	Veteran	\$0.00	\$0.00	-	-	100	17	83	17%	27	33	44%	0.0%	0.0%	0.0%	
Reduced Fare	Express Bus	Non-Rush Hour	Cash or Similar	\$1.00	\$1.00	-	-	390	35	355	9%	25	301	8%	0.2%	0.0%	0.0%	
Reduced Fare	Express Bus	Non-Rush Hour	Metropass	\$1.00	\$1.00	-	-	109	1	108	1%	0	96	0%	0.0%	0.0%	0.0%	
Reduced Fare	Express Bus	Non-Rush Hour	U-Pass	\$1.00	\$1.00	-	-	14	0	14	0%	0	14	0%	0.0%	0.0%	0.0%	
Reduced Fare	Express Bus	Rush Hour	Cash or Similar	\$3.25	\$1.00	-\$2.25	-69.2%	70	7	63	10%	10	61	14%	0.0%	0.0%	0.0%	
Reduced Fare	Express Bus	Rush Hour	Metropass	\$3.22	\$1.00	-\$2.22	-68.9%	86	0	86	0%	0	56	0%	0.0%	0.0%	0.0%	
Reduced Fare	Express Bus	Rush Hour	10-Ride Pass	\$1.60	\$1.00	-\$0.60	-37.5%	6	0	6	0%	0	6	0%	0.0%	0.0%	0.0%	
Mobility Fare	Local Bus / METRO	Non-Rush Hour	Cash or Similar	\$1.00	\$1.00	-	-	3,520	1,528	1,993	43%	2,282	660	78%	1.5%	1.5%	3.0%	
Mobility Fare	Local Bus / METRO	Non-Rush Hour	Metropass	\$1.00	\$1.00	-	-	118	67	51	57%	82	30	73%	0.1%	0.1%	0.1%	
Mobility Fare	Local Bus / METRO	Non-Rush Hour	U-Pass	\$1.00	\$1.00	-	-	29	9	20	32%	29	0	100%	0.0%	0.0%	0.0%	
Mobility Fare	Local Bus / METRO	Non-Rush Hour	College Pass	\$1.00	\$1.00	-	-	43	37	6	85%	33	11	75%	0.0%	0.0%	0.0%	
Mobility Fare	Local Bus / METRO	Non-Rush Hour	10-Ride Pass	\$1.00	\$1.00	-	-	3	3	0	100%	3	0	100%	0.0%	0.0%	0.0%	
Mobility Fare	Local Bus / METRO	Non-Rush Hour	Veteran	\$0.00	\$0.00	-	-	370	168	202	45%	204	107	66%	0.2%	0.2%	0.3%	
Mobility Fare	Local Bus / METRO	Non-Rush Hour	Token	\$0.00	\$0.00	-	-	40	33	7	83%	37	3	93%	0.0%	0.0%	0.0%	
Mobility Fare	Local Bus / METRO	Rush Hour	Cash or Similar	\$1.00	\$1.00	-	-	1,024	417	607	41%	697	161	81%	0.4%	0.4%	0.9%	
Mobility Fare	Local Bus / METRO	Rush Hour	Metropass	\$1.00	\$1.00	-	-	112	72	39	65%	33	13	72%	0.0%	0.1%	0.0%	
Mobility Fare	Local Bus / METRO	Rush Hour	U-Pass	\$1.00	\$1.00	-	-	12	0	12	0%	12	0	100%	0.0%	0.0%	0.0%	
Mobility Fare	Local Bus / METRO	Rush Hour	10-Ride Pass	\$1.00	\$1.00	-	-	6	6	0	100%	6	0	100%	0.0%	0.0%	0.0%	
Mobility Fare	Local Bus / METRO	Rush Hour	Veteran	\$0.00	\$0.00	-	-	156	79	76	51%	86	62	58%	0.1%	0.1%	0.1%	
Mobility Fare	Express Bus	Non-Rush Hour	Cash or Similar	\$1.00	\$1.00	-	-	157	24	133	16%	27	127	17%	0.1%	0.0%	0.0%	
Mobility Fare	Express Bus	Non-Rush Hour	Metropass	\$1.00	\$1.00	-	-	38	2	36	6%	2	21	9%	0.0%	0.0%	0.0%	
Mobility Fare	Express Bus	Non-Rush Hour	U-Pass	\$1.00	\$1.00	-	-	2	0	2	0%	2	0	100%	0.0%	0.0%	0.0%	
Mobility Fare	Express Bus	Non-Rush Hour	Veteran	\$0.00	\$0.00	-	-	6	0	6	0%	0	6	0%	0.0%	0.0%	0.0%	
Mobility Fare	Express Bus	Rush Hour	Cash or Similar	\$1.00	\$1.00	-	-	136	64	72	47%	81	42	66%	0.1%	0.1%	0.1%	
Mobility Fare	Express Bus	Rush Hour	Metropass	\$1.00	\$1.00	-	-	26	0	26	0%	8	18	29%	0.0%	0.0%	0.0%	
Mobility Fare	Express Bus	Rush Hour	U-Pass	\$1.00	\$1.00	-	-	6	6	0	100%	6	0	100%	0.0%	0.0%	0.0%	
Mobility Fare	Express Bus	Rush Hour	10-Ride Pass	\$1.00	\$1.00	-	-	3	3	0	100%	3	0	100%	0.0%	0.0%	0.0%	
TAP	All	All	TAP Card	\$1.00	\$1.00	-	-	5,962	3,682	2,281	62%	5,087	0	100%	2.6%	3.7%	6.7%	
								Total	229,326	100,519	128,807	43.8%	76,338	119,329	39.0%	100.0%	100.0%	100.0%
								Impacted	1,529	337	1,192	22.0%	410	847	32.6%	0.7%	0.3%	0.5%

Step 2: Calculate Average Fares

Table 18 shows the average fare per trip (regardless of fare combination) under the existing and proposed fare structures for all riders, BIPOC riders, white riders, low-income riders, and non-low-income riders under change Scenario 3. These represent rider-weighted averages based on fare values and the number of riders from Table 17.

The percent changes in average fare per trip from Table 18 are used in Step 3 to determine disparate impact and disproportionate burden.

Table 18. Average Fare per Trip by Rider Group, Scenario 3

	All Riders	Minority Riders	Non-Minority Riders	Low-Income Riders	Non-Low-Income Riders
Impacted Riders	--	--	--	--	--
Count	1,529	337	1,192	410	847
Percent of total	0.7%	0.3%	0.9%	0.5%	0.7%
Percent makeup	--	22.0%	78.0%	32.6%	67.4%
Average Fare per Trip	--	--	--	--	--
Existing Fare	\$2.041	\$1.949	\$2.113	\$1.825	\$2.211
Proposed Fare	\$2.031	\$1.944	\$2.099	\$1.817	\$2.200
Absolute Change	\$0.010	\$0.005	\$0.014	\$0.008	\$0.011
Percent Change	0.496%	0.241%	0.680%	0.419%	0.507%
Comparison Index*	--	0.35	--	0.83	--

*Example: $-0.241\% / -0.680\% = 0.35$

Note: Any apparent errors in the change or difference values are due to rounding.

Step 3: Compare Changes

As shown in Table 18, on average, BIPOC riders would experience a less than one quarter of one percent (0.241%) decrease in fare paid per trip under Scenario 3 compared to existing fares. While the difference is very small in absolute terms, the fare decrease for BIPOIC riders (0.241%) would be about one third of that for white riders (0.680%), as indicated by the comparison index of 0.35. The

comparison index must be 0.80 or greater to avoid disparate impact. Therefore, per Metro Transit Title VI policies, this analysis identified **potential for disparate impact on BIPOC riders** as a result of the Scenario 3 proposed fare changes.

On average, low-income riders would experience a less than one half of one percent (0.419%) decrease in fare paid per trip – a slightly smaller decrease than that for the average non-low-income rider (0.507% decrease) [Table 18]. However, the resulting comparison index of 0.83 is greater than the 0.80 threshold for disproportionate burden. Therefore, per Metro Transit Title VI policies, this analysis identified **no disproportionate burden on low-income riders** as a result of the Scenario 3 proposed fare changes.

Step 4: Explore Alternatives to Avoid, Minimize, or Mitigate

In light of the finding of potential for disparate impact on BIPOC riders from the proposed fare changes under Scenario 3, Metro Transit and the Metropolitan Council are required to consider modifying the proposal to remove such impacts before continuing. Below is federal guidance related to such a situation.

Federal Guidance

As stated in the FTA Circular 4702.1B (page IV-20):

If the transit provider finds potential disparate impacts and then modifies the proposed changes in order to avoid, minimize or mitigate those impacts, the transit provider must reanalyze the proposed changes in order to determine whether the modifications actually removed the potential disparate impacts of the changes...

If a transit provider chooses not to alter the proposed fare changes despite the disparate impact on minority ridership, or if the transit provider finds, even after the revisions, that minority riders will continue to bear a disproportionate share of the proposed fare change, the transit provider may implement the fare change only if:

- the transit provider has a substantial legitimate justification for the proposed fare change, **and**
 - the transit provider can show that there are no alternatives that would have a less disparate impact on minority riders but would still accomplish the transit provider's legitimate program goals.
- It is important to understand that in order to make this showing, the transit provider must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative...

If the transit provider determines that a proposed fare change will have a disparate impact, the transit provider shall analyze the alternatives (identified in the second bullet above) to determine whether alternatives exist that would serve the same legitimate objectives but with less of a disparate effect on the basis of race, color, or national origin. The existence of such an alternative method of accomplishing the transit provider's substantial and legitimate interests demonstrates that the disparate effects can be avoided by adoption of the alternative methods without harming such interests. In addition, if evidence undermines the legitimacy of the transit provider's asserted justification—that is, that the justification is not supported by demonstrable evidence—the disparate effects will violate Title VI, as the lack of factual support will indicate that there is not a substantial legitimate justification for the disparate effects. At that point, the transit provider must revisit the fare changes and make adjustments that will eliminate unnecessary disparate effects on populations defined by race, color, or national origin. Where disparate

impacts are identified, the transit provider shall provide a meaningful opportunity for public comment on any proposed mitigation measures, including any less discriminatory alternatives that may be available.

Analysis of alternatives

This fare equity analysis evaluates three proposed fare change scenarios. Each scenario was developed toward achieving the legitimate program goals of simplifying the regional fare system as a means of making the regional regular-route transit system easier to understand and more convenient to use for both existing and potential riders; decreasing fares for the average rider, and, in turn; increasing ridership.

This analysis identified no disparate impact on BIPOC riders and no disproportionate burden on low-income riders as a result of the Scenario 1 and Scenario 2 proposed fare changes. Thus, Scenarios 1 and 2 are alternatives that “would have a less disparate impact on minority riders but would still accomplish the transit provider’s legitimate program goals” when compared to Scenario 3.

Therefore, given the legitimate program goals and the presence of alternatives that would have less of a disparate impact on BIPOC riders, there is no substantial legitimate justification for the disparate effects resulting from Scenario 3. Per FTA Circular 4702.1B, Metro Transit and the Metropolitan Council should no longer consider Scenario 3 a viable proposed fare change under these specific circumstances.

Summary of Results from all Scenarios

Table 19 lists the proposed fare changes by change scenario. Table 20 summarizes the average percent change in fare for each population group as well as the comparison index under each fare change scenario.

- On average, all scenarios result in fare decreases for all demographic rider groups.²²
- In all three scenarios, the average fare decrease would be small, ranging from 0.24% to 4.96%.
- In Scenario 1, BIPOC riders and low-income riders would experience a similar fare decrease as white riders and non-low-income riders.
- In Scenario 2, BIPOC riders and low-income riders would experience 37% to 43% greater fare decrease than white riders and non-low-income riders, respectively.
- Neither Scenario 1 nor 2 show potential for disparate impact on BIPOC riders or disproportionate burdens on low-income riders.
- Scenario 3 does show potential for disparate impact on BIPOC riders.
- While it does not rise to the level of disproportionate burden, low-income riders would receive 17% less benefit than non-low-income riders, on average, in Scenario 3.

²² Though, on average, fares would decrease, Scenario 2 would increase fares for some riders – about eight percent of total regional riders, four percent of BIPOC riders, and one percent of low-income riders (**Table 12**). However, the majority of riders who would have their fare impacted under Scenario 2 would experience a decrease.

Table 19. Proposed Fare Changes by Change Scenario

Change Description	Scenario 1	Scenario 2	Scenario 3
Eliminate the Rush-Hour[^] surcharge for Reduced Fare[*] riders, resulting in a \$1.00 fare at all times of day on both Local Bus / METRO and Express Bus service types	Included	Included	Included
Eliminate the Rush-Hour surcharge for the Adult^{**} fare type on Local Bus / METRO service, resulting in a \$2.00 fare at all times of day on applicable routes	Included	Not Included	Not Included
Eliminate the Rush-Hour surcharge for the Adult fare type, resulting in a \$2.00 fare at all times of day on Local Bus / METRO service and a \$3.00 fare at all times of day on Express Bus service	Not Included	Included	Not Included

Table 20. Results by Rider Group, Scenarios 1, 2, and 3

Scenario	Measure	Minority Riders	Non-Minority Riders	Low-Income Riders	Non-Low-Income Riders
1	Percent Change in Average Fare	-4.96%	-4.70%	-4.65%	-4.80%
1	Comparison Index*	1.05	--	0.97	--
1	Disparate Impact / Disproportionate Burden?	No	--	No	--
2	Percent Change	-4.30%	-3.13%	-4.33%	-3.03%
2	Comparison Index*	1.37	--	1.43	--
2	Disparate Impact / Disproportionate Burden?	No	--	No	--

3	Percent Change	- 0.241%	- 0.680%	- 0.419%	- 0.507%
3	Comparison Index*	0.35	--	0.83	--
3	Disparate Impact / Disproportionate Burden?	Yes	--	No	--

*Example: $-4.65\% / -4.80\% = 0.97$

Note: Any apparent errors in the change or difference values are due to rounding.

CHAPTER 6: CONCLUSIONS

Metro Transit and the Metropolitan Council, in coordination with other regional transit providers, are proposing a package of fare changes that would simplify the regional fare structure and decrease fares slightly for the average rider of the regional regular-route transit system. The proposed fare changes align with the Metropolitan Council's fare policy goals of balancing equity, fare simplification, and revenue generation.

This analysis reviewed the extent to which the changes in average fare differ between BIPOC riders and white riders, and between low-income riders and non-low-income riders as a result of the proposed fare changes. This report meets the FTA requirement for transit providers such as Metro Transit to conduct a Title VI fare equity analysis, prior to implementation, for any proposed fare change, regardless of the amount of increase or decrease.

Three fare simplification scenarios were evaluated, each representing a packages of fare changes. On average, each scenario would result in a fare decrease of about 0.5% to 5.0%.

Evaluation of Scenarios 1 and 2, separately, found:

- **no disparate impact** on BIPOC riders a result of proposed fare changes, and
- **no disproportionate burden** on low-income riders as a result of proposed fare changes.

Evaluation of Scenario 3 found:

- **potential for disparate impact** on BIPOC riders a result of proposed fare changes, and
- **no disproportionate burden** on low-income riders as a result of proposed fare changes.

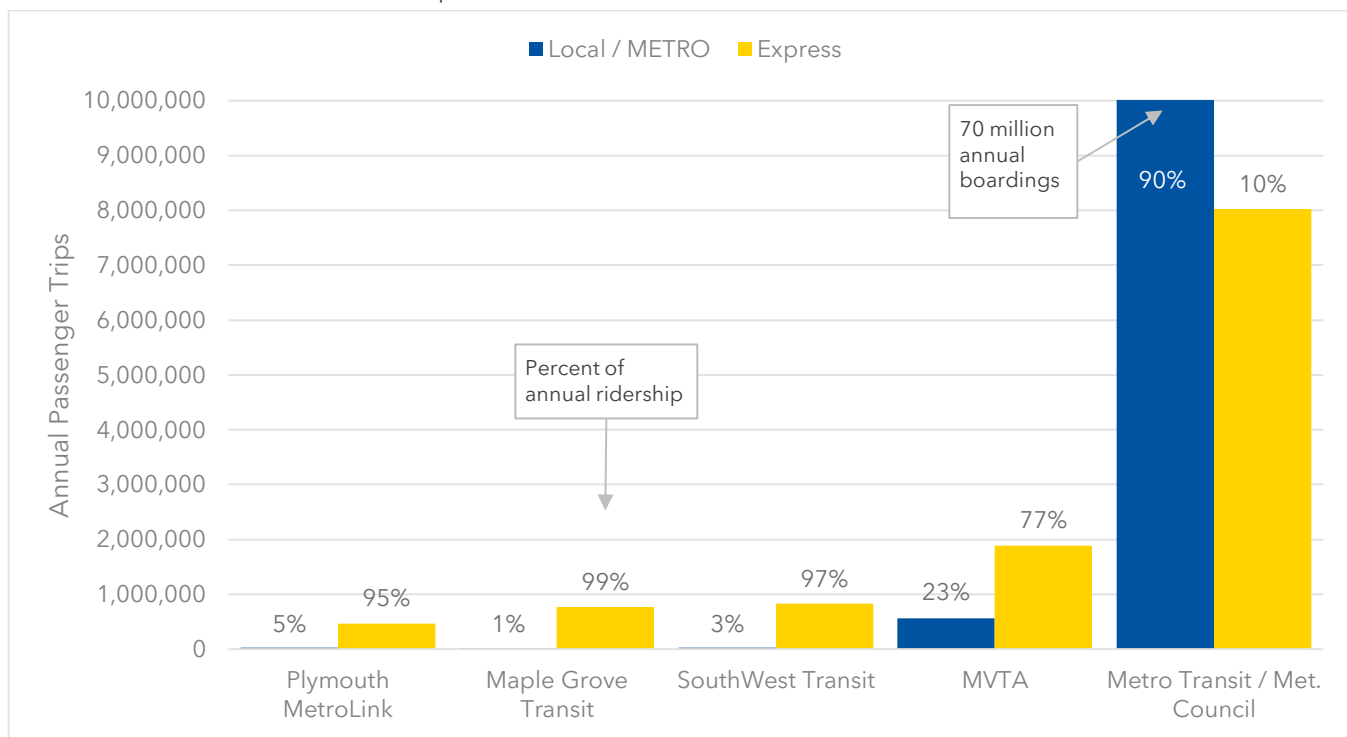
In coordination with other regional transit providers, Metro Transit and Metropolitan Council leadership will consider the findings of this fare equity analysis before determining next steps, including whether or not to pursue one of the proposed fare change scenarios.

APPENDIX A: SERVICE TYPE DETAILS

Figure 2 shows the number and percent of 2019 annual passenger trips (ridership) by service type for all regular fixed routes by regional transit provider. The source of these data are the Metropolitan Council's 2019 Regional Route Performance Analysis.²³ Year 2019 was the last full year before the beginning of the COVID-19 pandemic, which had a significant impact on transit ridership in the region and nationwide. The ridership numbers are provided for context only, as they differ from those derived from the primary data source of the fare equity analysis, the Travel Behavior Inventory (TBI) 2016 Transit On Board Survey.²⁴

Figure 2. 2019 Annual Passenger Trips by service type and regional transit provider

Excludes Northstar commuter rail and special event service



Source: [Metropolitan Council's 2019 Regional Route Performance Analysis](https://metro council.org/Transportation/Planning-2/Reports/Transit-Transitways/Regional-Route-Performance-Analysis.aspx)

²³ Metropolitan Council, *Regional Route Performance Analysis, 2019*. <https://metro council.org/Transportation/Planning-2/Reports/Transit-Transitways/Regional-Route-Performance-Analysis.aspx>.

²⁴ Metropolitan Council, *Travel Behavior Inventory (TBI) 2016 On Board Survey*. <https://gisdata.mn.gov/dataset/us-mn-state-metc-society-tbi-transit-onboard2016>.

Also referencing data from the 2019 Regional Route Performance Analysis, Table 21 lists all regional regular routes that operated at one point in 2019, alongside the regional transit provider of the route, the service type (for fare purposes), and total annual passenger trips.

Table 21. Regional Regular Fixed Routes by Service Type

Source: [Metropolitan Council's 2019 Regional Route Performance Analysis](#)

Provider	Service Type	Route	Annual Passenger Trips (2019)
Metro Transit	Local	2	1,645,480
Metro Transit	Local	3	1,730,087
Metro Transit	Local	4	1,514,308
Metro Transit	Local	5	3,913,674
Metro Transit	Local	6	2,185,490
Metro Transit	Local	7	460,694
Metro Transit	Local	9	727,866
Metro Transit	Local	10	1,979,398
Metro Transit	Local	11	1,251,596
Metro Transit	Local	12	312,203
Metro Transit	Local	14	1,414,948
Metropolitan Council	Local	16	115,947
Metro Transit	Local	17	1,517,381
Metro Transit	Local	18	2,870,952
Metro Transit	Local	19	992,036
Metro Transit	Local	21	3,195,359
Metro Transit	Local	22	1,484,659
Metro Transit	Local	23	442,364
Metro Transit	Local	25	231,195
Metropolitan Council	Local	27	21,676
Metropolitan Council	Local	30	174,396
Metro Transit	Local	32	469,639
Metro Transit	Local	39	29,170
Metro Transit	Local	46	297,807
Metro Transit	Express	53	190,650
Metro Transit	Local	54	1,547,432
Metro Transit	Local	59	145,922
Metro Transit	Local	61	620,208
Metro Transit	Local	62	757,749
Metro Transit	Local	63	1,203,393
Metro Transit	Local	64	1,200,064
Metro Transit	Local	65	292,593
Metro Transit	Local	67	269,951
Metro Transit	Local	68	900,350
Metro Transit	Local	70	191,846
Metro Transit	Local	71	426,965

Provider	Service Type	Route	Annual Passenger Trips (2019)
Metro Transit	Local	74	1,200,718
Metro Transit	Local	75	174,525
Metropolitan Council	Local	80	109,092
Metropolitan Council	Local	83	124,281
Metropolitan Council	Local	84	136,366
Metropolitan Council	Local	87	256,511
Metro Transit	Express	94	488,167
Metro Transit	Express	111	15,826
Metro Transit	Express	113	88,767
Metro Transit	Express	114	101,415
Metro Transit	Express	115	9,417
Metropolitan Council	Express	118	16,920
Metro Transit	Local	129	12,284
Metro Transit	Express	133	56,600
Metro Transit	Express	134	128,059
Metro Transit	Express	135	69,020
Metro Transit	Local	141	88,995
Metro Transit	Express	146	94,233
Metro Transit	Express	156	118,842
Metropolitan Council	Local	219	160,272
Metropolitan Council	Local	223	33,985
Metropolitan Council	Local	225	25,499
Metropolitan Council	Local	227	21,945
Metro Transit	Express	250	383,571
Metro Transit	Express	252	20,570
Metro Transit	Express	261	93,634
Metro Transit	Local	262	21,032
Metro Transit	Express	263	85,862
Metro Transit	Express	264	134,743
Metro Transit	Express	265	43,816
Metro Transit	Express	270	314,883
Metro Transit	Express	272	9,921
Metro Transit	Express	275	100,302
Metro Transit	Express	288	138,258
Metro Transit	Express	294	66,778
Metropolitan Council	Express	350	28,726
Metro Transit	Express	351	73,690
Metro Transit	Express	353	6,535
Metro Transit	Express	355	246,438
Metro Transit	Express	361	50,210
Metropolitan Council	Express	364	11,120
Metro Transit	Express	365	169,036

Provider	Service Type	Route	Annual Passenger Trips (2019)
Metro Transit	Express	375	170,529
Metro Transit	Local	415	2,493
Metropolitan Council	Express	417	5,165
MVTA	Local	420	18,387
MVTA	Local	421	4,429
MVTA	Local	426	7,307
MVTA	Local	436	23,582
MVTA	Local	440	43,119
MVTA	Local	442	27,992
MVTA	Local	444	233,634
MVTA	Local	445	13,760
MVTA	Local	446	69,249
Metro Transit	Express	452	31,762
MVTA	Express	460	398,618
MVTA	Express	464	51,153
MVTA	Express	465	215,792
Metro Transit	Express	467	297,589
MVTA	Express	470	109,604
MVTA	Express	472	67,609
MVTA	Express	475	58,451
MVTA	Express	476	88,250
MVTA	Express	477	346,040
MVTA	Express	478	48,301
MVTA	Express	479	11,468
MVTA	Express	480	129,186
MVTA	Express	484	55,825
MVTA	Local	489	16,441
MVTA	Express	490	126,881
MVTA	Express	491	5,349
MVTA	Express	492	2,072
MVTA	Express	493	55,379
MVTA	Express	495	114,065
MVTA	Local	497	15,982
MVTA	Express	498	240
MVTA	Local	499	15,830
Metro Transit	Local	515	460,132
Metro Transit	Express	535	383,789
Metropolitan Council	Local	537	17,321
Metropolitan Council	Local	538	115,296
Metropolitan Council	Local	539	215,133
Metropolitan Council	Local	540	183,338
Metropolitan Council	Local	542	48,086

Provider	Service Type	Route	Annual Passenger Trips (2019)
Metro Transit	Express	552	51,422
Metro Transit	Express	553	47,555
Metro Transit	Express	554	78,714
Metro Transit	Express	558	44,651
Metro Transit	Express	578	104,748
Metro Transit	Express	579	19,283
Metro Transit	Express	587	59,244
Metro Transit	Express	588	8,110
Metro Transit	Express	589	45,853
Metro Transit	Express	597	126,166
Southwest Transit	Local	600	4,728
Southwest Transit	Express	602	2,568
Metropolitan Council	Local	604	11,501
Metro Transit	Local	612	189,507
Metropolitan Council	Local	614	5,929
Metropolitan Council	Local	615	44,260
Metro Transit	Express	643	26,069
Metro Transit	Express	645	389,532
Metro Transit	Express	652	32,178
Metro Transit	Express	663	115,767
Metro Transit	Express	664	49,097
Metro Transit	Express	667	102,474
Metro Transit	Express	668	32,433
Metropolitan Council	Express	670	34,875
Metropolitan Council	Express	671	19,106
Metro Transit	Express	672	52,546
Metro Transit	Express	673	146,099
Metro Transit	Express	674	22,511
Metro Transit	Express	677	40,349
Metro Transit	Express	679	3,385
Southwest Transit	Express	690	344,222
Southwest Transit	Express	691	3,296
Southwest Transit	Express	692	10,717
Southwest Transit	Express	695	81,343
Southwest Transit	Express	697	83,186
Southwest Transit	Express	698	175,352
Southwest Transit	Express	699	123,000
Metropolitan Council	Local	705	66,439
Metropolitan Council	Local	716	43,613
Metropolitan Council	Local	717	69,595
Metro Transit	Local	721	238,170
Metro Transit	Local	722	248,869

Provider	Service Type	Route	Annual Passenger Trips (2019)
Metro Transit	Local	723	167,683
Metro Transit	Local	724	574,833
Plymouth	Local	740	6,052
Plymouth	Local	741	9,631
Plymouth	Express	742	21,608
Plymouth	Express	747	57,093
Metro Transit	Express	755	98,329
Metro Transit	Express	756	46,704
Metro Transit	Express	758	107,550
Metro Transit	Express	760	112,504
Metro Transit	Express	761	50,970
Metropolitan Council	Express	762	23,457
Metro Transit	Express	763	47,348
Metro Transit	Express	764	50,139
Metro Transit	Express	765	34,154
Metro Transit	Express	766	126,985
Metro Transit	Express	767	44,805
Metro Transit	Express	768	349,523
Plymouth	Local	771	6,093
Plymouth	Express	772	63,158
Plymouth	Express	774	87,867
Plymouth	Express	776	80,491
Plymouth	Express	777	55,595
Maple Grove Transit	Express	780	18,640
Maple Grove Transit	Express	781	396,442
Maple Grove Transit	Express	782	37,745
Maple Grove Transit	Express	783	60,109
Maple Grove Transit	Express	785	235,386
Maple Grove Transit	Local	787	2,519
Maple Grove Transit	Local	788	6,283
Maple Grove Transit	Express	789	17,953
Plymouth	Express	790	79,817
Plymouth	Local	791	3,290
Plymouth	Express	793	10,755
Plymouth	Express	795	5,372
Metropolitan Council	Local	801	73,770
Metropolitan Council	Local	805	86,770
Metro Transit	Local	824	40,356
Metro Transit	Local	825	127,408
Metropolitan Council	Local	831	23,126
Metro Transit	Express	850	450,802
Metro Transit	Express	852	225,392

Provider	Service Type	Route	Annual Passenger Trips (2019)
Metro Transit	Express	854	108,481
Metro Transit	Express	860	116,019
Metro Transit	Express	865	131,935
MVTA	Local	445 / 438	72,146
Southwest Transit	Local	SW Flex	20,859
Metro Transit	Local	METRO Blue Line	11,045,239
Metro Transit	Local	METRO Green Line	14,254,202
Metropolitan Council	Local	METRO Red Line	242,372
Metro Transit	Local	METRO A Line	1,676,916
Metro Transit	Local	METRO C Line	1,218,836

APPENDIX B: METHODOLOGY DETAILS

The following is a continuation of *Chapter 4: Analysis Methodology*.

Developing Unique Fare Combinations

Following initial cleaning and processing of the TBI on board survey, unique fare combinations were developed and assigned to each survey record used in the analysis to determine the appropriate fare per paying trip. This, in combination with the race / ethnicity and income-related data within the survey, were used to create a demographic profile of Metro Transit riders by the fare they use. In turn, these values were used to determine existing and proposed average fare for BIPOC riders, white riders, low-income riders, and non-low-income riders (shown in *Chapter 5: Evaluation of Impacts*).

As described in the *Factors Affecting Existing Fares* section of *Chapter 2*, the fare paid per trip depends on the unique combination of fare type, service time, time of day, and payment method. These fare variables and their sub-variables used in the analysis are summarized in Table 22.

Each of the usable records from the cleaned TBI 2016 On Board Survey (n=26,702, representing 229,346 linked trips) were categorized into one of the 78 unique fare combinations. Notably, just 16 of the 78 existing unique fare combinations are used by greater than 1% of riders; added together, these combinations represent 94% of total riders.

Table 22. Variables and Sub-Variables used in Analysis to Develop Demographic Fare Profiles

Variable	Sub-Variable	Analysis Sub-Variable Relationship to On Board Survey
Fare Type	Adult	Reported in survey as "Regular (ages 13-64)" fare type
Fare Type	Reduced Fare	Combined the following fare types reported in survey: "Youth (ages 6-12)" and "Seniors (ages 65+)"
Fare Type	Mobility Fare	Reported in survey as "Limited Mobility Pass"
Fare Type	Transit Assistance Program (TAP)	Not reported in survey; process for approximating TAP riders described below
Service Type	Local Bus / METRO	Combined the following route types reported in survey: "Urban Local", "Suburban Local", "BRT", and "Rail"
Service Type	Express Bus	Reported in survey as "Express" route type
Time of Day	Rush Hour	Combined the following time periods reported in survey: "AM Peak" and "PM Peak"
Time of Day	Non-Rush Hour	Combined the following time periods reported in survey: "Midday" and "Evening"

Variable	Sub-Variable	Analysis Sub-Variable Relationship to On Board Survey
Pay Method	Cash or Similar	Payment methods that, alone, do not offer discounted trips were combined into a cash and cash-like category in an effort to minimize the number of unique fare combinations reported. The following payment methods from the survey were combined into this category: "Cash", "Go-To Stored Value", "Credit / Debit", and "Mobile Ticket". While the precise medium may differ, each of these payment methods results in the same fare within the same combination of fare type, service type, and time of day.
Pay Method	Metropass	Unlimited-ride monthly pass available through participating companies and organizations, costing \$83 per month (or less depending on pass-through subsidy)
Pay Method	Employee Pass	While an option in the survey, no such pass is currently offered. This payment type was treated equal to Metropass
Pay Method	U-Pass	Unlimited-ride school semester pass available through the University of Minnesota, costing \$114 per semester
Pay Method	College Pass	Unlimited-ride school semester pass available through participating higher and continuing education schools, costing \$165 per semester (or less depending on pass-through subsidy)
Pay Method	Student Pass	Unlimited-ride school quarter pass available to eligible high school students at Minneapolis Public Schools and Saint Paul Public Schools. Many students are eligible for free passes; those who do not qualify may purchase a pass at a discounted rate through their school. Eligibility and cost to students differ based on policies set by the school districts. Metro Transit charges the school districts \$97 per pass, which is valid for a school quarter.
Pay Method	10-Ride Pass	Temporary pass offering 10 rides valid toward a \$3.25 fare on buses and trains at a discounted cost of \$20.50 for seniors (65+) and \$15.00 for students (K-12); also known as Go-To Lite cards
Pay Method	Veteran	Disabled Veterans ride free at all times by showing a Veteran's Identification Card issued by the Dept. of Veterans Affairs with the words "Service Connected" or "SC" below the photo
Pay Method	Token	Tokens are available to participating social service agencies and nonprofits with a wholesale account and must be distributed to transit riders at no cost

Approximating TAP Card Use

TAP launched in October 2017 and thus TAP Card use is not reflected in the 2016 TBI Transit On Board Survey. However, it was deemed important to attempt to incorporate TAP riders in this fare equity analysis, given the program's success and direct connection to the region's equity initiatives.

To receive a TAP Card and become eligible for \$1.00 fares, residents must provide personal identification and documentation that they meet the program's income guidelines.²⁵ An approval letter for Supplemental Nutrition Assistance Program (SNAP) is among the most popular forms of documentation of income eligibility used to receive a TAP Card. In this fare equity analysis, riders were considered eligible for TAP based on estimated eligibility for SNAP.²⁶ In doing so, a combination of self-

²⁵ Information on TAP and acceptable documentation is available at <https://www.metrotransit.org/tap-riders>.

²⁶ Minnesota SNAP guidelines are available at: <https://mn.gov/dhs/people-we-serve/adults/economic-assistance/food-nutrition/programs-and-services/supplemental-nutrition-assistance-program.jsp>.

reported household income, household size, and disability status from the TBI on board survey were used.

In addition to eligibility, assumptions were made about which riders would benefit from and be motivated to apply for a TAP Card. Under the current fare structures the following users could save money using the \$1.00 TAP fare and were included in the pool of potential TAP riders:

- Adult fare type (all service types, both time of day categories)
- Reduced Fare riders of Local Bus / METRO service during Rush Hour
- Reduced Fare riders of Express Bus service during Rush Hour

Conversely, all Mobility Fare riders (all service types, both time of day categories) already receive \$1.00 fares, and disabled veterans using a service connected Veteran’s Identification Card ride free. These riders were assumed to not be motivated to apply for TAP.

TAP Card use was calibrated to 2.6% of total riders in the analysis, approximating TAP use observed by Metro Transit in October 2019. Further, Metro Transit tracks monthly TAP ridership by service type and time of day for all regional providers. These data, along with information about the distribution of total linked rides between fare types, service types, and times of day were used to reassign fare combinations to TAP for the 2.6% of total riders presumed to use TAP. In doing so, the number of total daily linked trips / riders in the analysis remained the same, but incorporated TAP use through redistribution among other fare combinations. Distributing TAP riders between BIPOC riders and white riders was done by assuming the same proportional breakdowns as that of all riders of the same service type and time of day. All TAP riders were considered low-income in the analysis.

Per-Trip Fare Assumptions for Multiple-Ride Passes

The determination of disparate impact and disproportionate burden in this analysis is based on the average percent change in fare per trip. Thus, assumptions needed to be made regarding ride-limited and unlimited-ride pass use rates to determine the fare paid for a specific single trip.

Unlimited-ride passes are among some of the most popular fare payment methods in the regional transit system; in the TBI on board survey, these include Metropass, Employee Pass, U-Pass, College Pass, and Student Pass. About one third of daily linked trips are made using one of these unlimited passes; the rates are lower among BIPOC riders and low-income riders, at 26% of total, respectively. While the full cost of unlimited-ride pass are well established, the per-trip cost cannot be determined without knowing how often a rider uses the pass. Use rates - and subsequent per-trip fares - were assigned to unlimited-ride passes based on Fall 2019 average use data collected by Metro Transit; these are shown in Table 23.

Table 23. Multiple-Ride Pass Assumptions

Pass Type	Pass	Full Cost*	Per	Trips per Pass Period ^	Effective Fare per Linked Trip
Unlimited-ride	Metropass / Employee Pass	\$83.00	Month	25.8	\$3.22

Pass Type	Pass	Full Cost*	Per	Trips per Pass Period ^	Effective Fare per Linked Trip
Unlimited-ride	U-Pass	\$114.00	School semester	75.5	\$1.51
Unlimited-ride	College Pass	\$165.00	School semester	77.8	\$2.12
Unlimited-ride	Student Pass	\$97.00	School quarter	79.5	\$1.22
Ride-limited	10-Ride Pass (Senior / K-12 student)	\$20.50 / \$15.00	10 rides	10.0	\$1.60

*Cost (spring 2022) to school or employer participating in the program. Additional subsidies for the pass user may apply (i.e., fully subsidized, partially subsidized, or full cost) depending on the participating organization's policies.

^Based on Metro Transit Fall 2019 pass use data

Metro Transit also offers a 10-Ride pass (also known as Go-To Lite cards) valid toward a \$3.25 fare on buses and trains at a discounted cost of \$20.50 for seniors (65+) and \$15.00 for students (K-12). The 10-Ride Pass is used by about one half of one percent of total riders. Given this, and in an effort to minimize the number of unique fare combinations, a single per-trip cost was assigned to 10-Ride Pass fare combinations. That cost was determined based on the per-trip cost for each eligible population group - \$2.05 per trip for seniors and \$1.50 per trip for K-12 students - then averaged based on each group's use as observed in the TBI on-board survey (17% seniors and 83% K-12 students). The resulting rider-weighted average cost per trip for 10-Ride Pass is \$1.60; this value was used in the analysis (Table 23).

The effective fare per linked trip was used in the analysis when it was below the posted (base) fare for the applicable combination of fare type, service type, and time of day. For example, the existing cash fare for an Adult rider of Local Bus / METRO service during Non-Rush-Hour is \$2.00 (Figure 1), while the effective fare per linked trip based on average use in Fall 2019 was assumed to be \$3.22 (Table 23). In this instance, the analysis used the lower of the two - \$2.00 - as the applicable fare.

Lastly, according to the TBI on board survey, about three quarters of riders using unlimited-ride passes have some or all of the pass subsidized by their employer or school. However, the survey does not provide enough information to determine the specific level of subsidy for all applicable records. Thus, instead of introducing further assumptions, the effect of pass subsidies was not included in the analysis.

Attachment H: Approved service monitoring evaluation

Council Chair Charles Zelle

Council
Members

Abdirahman Muse	Deb Barber	Kris Fredson	Molly Cummings	Phillip Stern	Reva Chamblis	Susan Vento
Chai Lee	Francisco J. Gonzalez	Judy Johnson	Peter Lindstrom	Raymond Zeran	Robert Lilligren	Wendy Wulff
Christopher Ferguson						

Meeting Minutes

Wednesday, December 8, 2021, 4:00 p.m.

IN ATTENDANCE

Barber, Cummings, Ferguson, Fredson, Gonzalez, Johnson, Lee, Lilligren, Stern, Vento, Wulff, Zeran, Chair Zelle

MEMBERS ABSENT

Chamblis, Lindstrom, Muse

CALL TO ORDER

A quorum being present, Chair Zelle called the meeting to order at 4:01 p.m. on the following roll call vote:

Aye:	12	Barber, Cummings, Ferguson, Fredson, Gonzalez, Johnson, Lee, Lilligren, Vento, Wulff, Zeran, Chair Zelle
Nay:	0	
Absent:	3	Chamblis, Lindstrom, Muse
No response:	1	Stern

AGENDA APPROVED

Chair Zelle noted that a roll call vote is not needed for approval of the agenda. Council Members did not have any comments or changes to the agenda.

APPROVAL OF MINUTES

It was moved by Cummings, seconded by Wulff to approve the minutes of the November 10, 2021, Council meeting.

Motion carried on the following roll call vote:

Aye:	12	Barber, Cummings, Ferguson, Fredson, Gonzalez, Johnson, Lee, Lilligren, Vento, Wulff, Zeran, Chair Zelle
Nay:	0	
Absent:	3	Chamblis, Lindstrom, Muse
No response:	1	Stern



PUBLIC INVITATION

The Council heard public testimony from ATU President Ryan Timlin and ATU Union Reps Ron Kammeuller and John Hawthorn on business item 2021-325: Rust Mitigation of Bombardier Light Rail Vehicles. They voiced their concerns on the work outsourced, the cost, and light rail vehicles transported out of state.

CONSENT AGENDA

Approval of the Consent Agenda (Items 1-15)

Consent Agenda Adopted

- 2021-283: That the Metropolitan Council Authorize the Regional Administrator to exercise bus purchase options utilizing the State of Washington’s Master Contract 06719-01 with Gillig LLC, to purchase three, thirtyfoot expansion transit buses in an amount not to exceed \$1,525,000.
- 2021-296: That the Metropolitan Council:
1. Approve Three Rivers Park District’s Eagle-Bryant Lake Regional Trail Master Plan.
 2. Acknowledge Three Rivers Park District’s intent to split the Eagle-Bryant Lake Regional Trail Search Corridor into two distinct but interconnected regional trails – the Eagle Lake Regional Trail and the Bryant Lake Regional Trail – which will be formally documented in the next update of the Regional Parks Policy Plan, anticipated in 2024.
 3. Require Three Rivers Park District, prior to initiating any new development of the regional trail corridor, to send preliminary plans to the Metropolitan Council’s Environmental Services Interceptor Engineering Assistant Manager.
- 2021-297: That the Metropolitan Council:
1. Approve Dakota County’s Spring Lake Park Reserve Master Plan.
- 2021-298: That the Metropolitan Council approve a grant of up to \$25,650 to Scott County, using funding from FY2021 Parks and Trails Legacy Fund, to acquire the vacant 15-acre Muehlenhardt property for Blakeley Bluffs Park Reserve.
- 2021-301: Metropolitan Council approve the attached list of Authorized Financial Institutions for 2022.
- 2021-314: That the Metropolitan Council authorizes the Regional Administrator to negotiate and execute a Joint Powers Agreement number 211030 on behalf of the Metro Transit Police Department with the State of Minnesota’s Department of Public Safety – Bureau of Criminal Apprehension (BCA). MTPD is also requesting that the Regional Administrator negotiate and executive an amendment to this JPA for Court Data Services.
- 2021-323: That the Metropolitan Council adopts Resolution 2021-40 authorizing the acquisition and condemnation of real property for the Interceptor 1-MN-320 Improvements, MCES Project No. 809205.
- 2021-324: That the Metropolitan Council pass Resolution 2021-41 authorizing the acquisition of permanent easements for the 8567 Forcemain Replacement at Channel Crossings,

Project No. 802863 and to initiate condemnation proceedings if direct purchase efforts are unsuccessful.

- 2021-328: That the Metropolitan Council authorize the Regional Administrator to negotiate and execute a METRO Gold Line Bus Rapid Transit (Gold Line) Master Utility Agreement (MUA) #21M085 with Northern States Power Company in an amount not to exceed \$4,800,000.
- 2021-330: That the Metropolitan Council authorize the sole-source purchase of 163 additional bus mobile validator (BMV) devices for Metro Transit and Metropolitan Transportation Services vehicles from Cubic Transportation Systems for an amount not to exceed \$540,000.
- 2021-331: That the Metropolitan Council authorize the Regional Administrator to execute a Memorandum of Understanding (MOU) with the Minnesota Department of Transportation (MnDOT) per state statute for the revenue use and distribution of MnPASS (E-Z Pass) revenues.
- 2021-332: That the Metropolitan Council adopt the Regional Transit Safety performance targets and approve an amendment to the 2022-2025 TIP to incorporate the targets as shown in the attachment.
- 2021-334: That the Metropolitan Council adopt an amendment to the 2022-2025 TIP to increase the cost of MnDOT's railroad bridge rehabilitation project.
- 2021-335: That the Metropolitan Council adopt an amendment to the 2022-2025 TIP to adjust the funding and length of MnDOT's I-94 maintenance project in the East Metro.
- 2021-336: That the Metropolitan Council adopt an amendment to the 2022-2025 TIP to increase the scope, cost and length of MnDOT's US 169 noise wall project in Edina.

It was moved by Lee, seconded by Ferguson.

Motion carried on the following roll call vote:

Aye:	13	Barber, Cummings, Ferguson, Fredson, Gonzalez, Johnson, Lee, Lilligren, Sterner Vento, Wulff, Zeran, Chair Zelle
Nay:	0	
Absent:	3	Chamblis, Lindstrom, Muse

BUSINESS

Community Development

2021-342 SW: That the Metropolitan Council:

1. Approve Dakota County's Minnesota River Greenway Regional Trail Master Plan Amendment for the Fort Snelling State Park segment.
2. Require Dakota County to send preliminary plans to the Metropolitan Council's Environmental Services Interceptor Engineering Assistant Manager prior to initiating any new development of the regional trail corridor.

It was moved by Lilligren, seconded by Sterner.

Motion carried on the following roll call vote:

Aye: 13 Barber, Cummings, Ferguson, Fredson, Gonzalez, Johnson, Lee, Lilligren,
Sterner Vento, Wulff, Zeran, Chair Zelle
Nay: 0
Absent: 3 Chamblis, Lindstrom, Muse

2021-349 SW: That the Metropolitan Council extend Planning Assistance grant agreements until June 30, 2022 for grantees with incomplete 2040 Comprehensive Plans.

It was moved by Lilligren, seconded by Johnson.

Motion carried on the following roll call vote:

Aye: 13 Barber, Cummings, Ferguson, Fredson, Gonzalez, Johnson, Lee, Lilligren,
Sterner Vento, Wulff, Zeran, Chair Zelle
Nay: 0
Absent: 3 Chamblis, Lindstrom, Muse

Environment – Reports on consent agenda

Management – Reports on consent agenda

Transportation

2021-240: That the Metropolitan Council approve the results of the 2021 Title VI Service and Facilities Standards Monitoring Study, which shows no disparate impact on communities of color and no disproportionate burden on low-income communities.

It was moved by Barber, seconded by Wulff.

Motion carried on the following roll call vote:

Aye: 13 Barber, Cummings, Ferguson, Fredson, Gonzalez, Johnson, Lee, Lilligren,
Sterner Vento, Wulff, Zeran, Chair Zelle
Nay: 0
Absent: 3 Chamblis, Lindstrom, Muse

2021-306: That the Metropolitan Council (Council) authorize the Regional Administrator through the Southwest Light Rail Transit (SWLRT) Council Authorized Representative to negotiate and execute a change order for Contract 15P307A with Lunda McCrossan Joint Venture (LMJV) in an amount not to exceed \$3,671,582.67.

It was moved by Barber, seconded by Cummings.

Motion carried on the following roll call vote:

Aye: 13 Barber, Cummings, Ferguson, Fredson, Gonzalez, Johnson, Lee, Lilligren,
Stern Vento, Wulff, Zeran, Chair Zelle

Nay: 0

Absent: 3 Chamblis, Lindstrom, Muse

2021-311: That the Metropolitan Council authorize the Regional Administrator to negotiate and execute Amendment No. 7 to Contract 14P156 with HDR Engineering, Inc. to add \$2,500,000 for a total contract amount not to exceed \$6,445,113.

It was moved by Barber, seconded by Fredson.

Motion carried on the following roll call vote:

Aye: 13 Barber, Cummings, Ferguson, Fredson, Gonzalez, Johnson, Lee, Lilligren,
Stern Vento, Wulff, Zeran, Chair Zelle

Nay: 0

Absent: 3 Chamblis, Lindstrom, Muse

2021-325: That the Metropolitan Council authorize the Regional Administrator to negotiate and execute contract 20P035 with RailCar Corporation for rust mitigation/fleet improvement services on the Bombardier, Type 1, Light Rail Vehicles (LRV's) in an amount not to exceed \$7,704,246.

Interim Chief Operations Officer Brian Funk gave a presentation on business item recommendations, why it's necessary, considerations and strategies, workforce shortage, and summary.

Council Members had a robust discussion. Council Members had concerns about the delay, cost and funding, outsourcing, the bid process, transparency with ATU Union, hiring process, and taking responsibility.

Council Member Stern had a question regarding the maintenance program.

Council Member Cummings stated we should have anticipated this years ago but understands the urgency. She would like to take the time to get questioned answered.

Council Member Barber appreciates the questions and concerns. She stated there is urgency but doesn't believe there are resources to do the work in-house and says there is a risk to cost, investment, and safety of vehicles if voted down or delayed.

Chair Zelle stated this is a sensitive issue with our relationship and communication with ATU and asked Wes to comment. Wes said there is a path to improve communication and work with ATU going forward.

Chair Zelle thanked everyone for the robust conversation. He believes delaying the vote is not worth it because of the financial risk, and with all the investigation done, he does not think we would learn anything more.

Council Member Wulff commented on outsourcing and said she supports the one-time deal.

Council Member Ferguson said he is concerned this will not be a one-time issue and suggested we change the management to prevent the same mistakes and conversations in the future.

Council Member Johnson asked if we could take it to the Management committee moving forward.

Council Member Johnson voted no because she would like more time to have questions answered and a long-term plan. She said this is about the process and has her best interest for Metropolitan Council.

Council Member Zeran voted no because he thinks we can do the work in-house and look at having an apprenticeship program and agreement to have a labor and management committee moving forward.

Council Member Vento voted no because we are a planning agency and said this does not speak well of our planning.

Council Member Fredson voted no because of outsourcing work out of state, the project cost, and losing the opportunity to build a workforce.

It was moved by Barber, seconded by Wulff.

Motion carried on the following roll call vote:

Aye:	8	Barber, Cummings, Ferguson, Gonzalez, Lee, Lilligren, Wulff, Chair Zelle
Nay:	5	Fredson, Johnson, Sterner, Vento, Zeran
Absent:	3	Chamblis, Lindstrom, Muse

2021-333: That, for the purposes of holding a public hearing and receiving public comment, the Metropolitan Council:

- Release the attached draft amendment #1 to the 2040 Transportation Policy Plan to amend in the arterial bus rapid transit Network Next system and amend in six MnDOT freight project selections; and
- Authorize a public comment period from December 9, 2021, to January 24, 2022 on the draft document, including a public hearing to be held on January 10, 2022, at 4:00 PM.

It was moved by Barber, seconded by Fredson.

Motion carried on the following roll call vote:

Aye:	13	Barber, Cummings, Ferguson, Fredson, Gonzalez, Johnson, Lee, Lilligren, Sterner Vento, Wulff, Zeran, Chair Zelle
Nay:	0	
Absent:	3	Chamblis, Lindstrom, Muse

OTHER BUSINESS

1. Information Item: SWLRT Quarterly update

Jim Alexander, SWLRT Project Director, Metro Transit, started the presentation with the 2021 construction highlights, systems contract work, construction activities, Franklin O&M facility, and real estate acquisition status. Jon Tao, OEO Consultant III in the Office of Equal Opportunity (OEO), presented the SWLRT DBE and Workforce participation report, and Manager of Community Outreach Sophia Ginis, Community Outreach Manager gave an update on communications and outreach.

Council Member Cummings encourages Council Members to take a tour.

2. Information Item: Comprehensive Plan Composite: Planning for Aging

Chair Zelle deferred this presentation due to the time.

At 6:00PM, Chair Zelle called for public comment on the Adoption of Resolutions for Metropolitan Council's 2022 Unified Budget and the 2021 Payable 2022 Tax Levies. Marie Henderson, CFO provided an update on changes to the Unified Budget since adoption of the Public Comment draft.

2021-310: Adoption of the following Resolutions for the Metropolitan Council's 2022 Unified Budget and the 2021, Payable 2022, Tax Levies:

2021-33: Adopting the Metropolitan Council's 2022 Unified Budget

2021-34: Adopting the Metropolitan Council's 2021 Tax Levy for General Purposes for Certification to the County Auditors

2021-35: Adopting the 2021 Tax Levy for the Livable Communities Demonstration Account in the Metropolitan Livable Communities Fund

2021-36: Adopting the 2021 Tax Levy for the Tax Base Revitalization Account of the Livable Communities Act

2021-37: Certifying the Tax Levy for 2021 for Debt Service on Future Transit Bonds

2021-38: Certifying the Tax Levy for 2021 for Debt Service on Future Parks Bonds

2021-39: Adopting the Metropolitan Council's 2021 Tax Levy for General Purposes for Certification to the Minnesota Commissioner of Revenue

It was moved by Ferguson, seconded by Johnson.

Motion carried on the following roll call vote:

Aye: 13 Barber, Cummings, Ferguson, Fredson, Gonzalez, Johnson, Lee, Lilligren, Sterner Vento, Wulff, Zeran, Chair Zelle

Nay: 0

Absent: 3 Chamblis, Lindstrom, Muse

REPORTS

Chair Zelle attended the Orange Line opening on Saturday, Dec 4 and appreciates Council Members and staff.

Council Members: None

Regional Administrator Mary Bogie introduced Georges Gonzalez the new deputy regional administrator and chief financial officer.

General Counsel: None

The meeting was adjourned at 6:27 p.m.

Certification

I hereby certify that the foregoing narrative and exhibits constitute a true and accurate record of the Metropolitan Council Meeting of November 10, 2021.

Approved this 8th day of December.

Liz Sund
Recording Secretary

2021 Title VI Service Monitoring Study

In Compliance with FTA Circular 4702.1B

Adopted December 8, 2021

Prepared for:



Prepared by:



EXECUTIVE SUMMARY

This report satisfies the Federal Transit Administration (FTA) Title VI requirement to monitor transit system performance relative to system-wide service standards and policies at least once every three years. FTA requires recipients of federal funding who provide fixed route service, including Metro Transit, to **develop and monitor quantitative system standards and policies to guard against discrimination toward racial and ethnic minorities and low-income communities related to the quality of and access to fixed route public transit service and facilities.**

While Metro Transit continually monitors its route and system-wide performance using a variety of measures (including incorporation of racial and socioeconomic equity), formal Title VI service monitoring to meet FTA requirements last occurred in fall 2018.

This Title VI Service Monitoring Study is one element of Metropolitan Council and Metro Transit's ongoing Title VI work. Further, Title VI compliance is one component of the broader equity and inclusion framework that Metro Transit uses to foster a community that thrives because each individual has access to their destination and feels welcomed.

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. *Executive Order 12898 - Federal Actions to Address Environmental Justice in BIPOC Populations and Low-Income Populations*, extends these protections to low-income communities as well. **Title VI was identified as one of several Federal laws that should be applied "to prevent BIPOC communities and low-income communities from being subject to disproportionately high and adverse environmental effects."**¹

Purpose

The purpose of the Title VI service monitoring requirement is to ensure that prior decisions related to the distribution of fixed route transit service and facilities have not resulted in a disparate impact on the basis of race, color, or national origin. If such is found, "the transit provider shall take corrective action to remedy the disparities to the greatest extent possible."²

While not specifically required by FTA, Metro Transit expands its service monitoring to include assessment of disproportionate burden on low-income populations, a protected class under the Environmental Justice executive order.

To meet the Title VI service monitoring requirement, Metro Transit fixed route service and facilities data from fall 2019 and fall 2020, and the latest residential and rider demographic data are compiled and analyzed relative to Metro Transit's established service standards and policies. Documented in

¹ Federal Transit Administration, *Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients*, October 1, 2012, page I-6, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf.

² FTA, *Circular 4702.1B*, page IV-10.

the Metropolitan Council's current [Title VI Program \(adopted in early 2020\)](#), Metro Transit's service standards and policies address the following:

- Vehicle load: To prevent overcrowding
- Vehicle headway: How often service comes
- On-time performance: To prevent early and late service
- Service availability: Through route spacing, midday service, and stop spacing
- Distribution of transit amenities: To ensure fair access to bus shelters, customer information, and other facility amenities
- Vehicle assignment: To ensure access to newer vehicles is fairly distributed

To meet the Title VI service monitoring requirement, service outcomes and compliance rates for each of these standards and policies are compared between routes (or stops or areas) designated as Black, Indigenous, and People of Color (BIPOC) and those designated as non-BIPOC, and similarly between low-income routes (or stops or areas) and those designated as non-low-income.

Extent of Analysis

This analysis includes all regular fixed routes directly operated by Metro Transit and those operated under contract to the Metropolitan Council (including METRO Red Line) under the Metro Transit brand in either fall 2019 or fall 2020. Metro Transit historically uses data from the most recent fall schedule for service monitoring and broader analysis performed throughout the agency, as this time of year is most representative of transit demand and typical service levels.

A Note on COVID-19 and its Impacts on Transit

While the long-term ridership impacts of the COVID-19 pandemic are not known, the short-term effects have been significant. Metro Transit modified its service levels and schedules throughout spring and summer 2020 as part of the ongoing, shared effort to respond to the COVID-19 pandemic. Service changes were made within the Governor's Peacetime Emergency declaration and in response to public health guidance and changes in travel demand, operations, and resources. In light of these factors, this study monitors service from fall 2019 and, where practical, fall 2020. Four local and 51 commuter and express routes regularly provided by Metro Transit remained suspended in Fall 2020; these routes are represented by fall 2019 service data in this analysis.

Title VI Definitions and Concepts

Racial and Ethnic Minorities

FTA defines a "BIPOC" 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. However, as part of efforts to use respectful and inclusive language, **Metro Transit and the Metropolitan Council prefer to use the term Black, Indigenous, and People of Color (BIPOC) rather than "BIPOC" when referring to people who identify as one or more of the above racial or ethnic groups.** As such, references to BIPOC in this report should be interpreted to mean the same thing as "BIPOC".

For the purposes of this evaluation, “non-BIPOC” or “non-BIPOC” persons are defined as those who self-identify as non-Hispanic white. All other persons, including those identifying as two or more races and/or ethnicities, are defined as BIPOC.

Low-Income Population

This Title VI service monitoring analysis uses 185% of the 2019 U.S. Census Bureau poverty thresholds to determine low-income status. The Council uses 185% of poverty thresholds to define poverty in its place-based equity research, regional policies, and other initiatives, and this Title VI analysis mirrors that approach.

Discrimination, Disparate Impact, and Disproportionate Burden

In *Circular 4702.1B*, FTA defines **discrimination** as referring 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.³

Disparate impact, a key concept for understanding Title VI regulations, is defined in the

Circulars as: 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.⁴

Similarly, FTA defines **disproportionate burden** as:

a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations.⁵

Per FTA guidance, Metro Transit uses its disparate impact and disproportionate burden thresholds as evidence of impacts severe enough to meet the definition of disparate impact or disproportionate burden.

Metro Transit has defined its disparate impact and disproportionate burden policies and thresholds using the “80% rule,” which states that there may be evidence of disparate impacts/disproportionate burden if:

- *Benefits* are being provided to *BIPOC/low-income* populations at a rate less than 80% of the benefits being provided to *non-BIPOC/non-low-income* populations, or
- *Adverse effects* are being borne by *non-BIPOC/non-low-income* populations at a rate less than 80% of the adverse effects being borne by *BIPOC/low-income* populations.

³ Federal Transit Administration, *Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients*, October 1, 2012, page I-2, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf.

⁴ FTA, *Circular 4702.1B*, page I-2

⁵ FTA, *Circular 4702.1B*, page I-2

The 80% 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.⁶ Metro Transit's decision to use the 80% rule for its disparate impact and disproportionate burden thresholds was subject to a formal public outreach process before being adopted by the Metropolitan Council in 2013.

In this analysis, **if the quantitative results indicate that service standard/policy compliance for BIPOC/ low-income routes (or stops or areas) is less than 80 percent of the compliance rate for non-BIPOC/ non-low-income routes (or stops or areas), this could be evidence of disparate impact/ disproportionate burden.** In these cases, additional analysis will be conducted, and potential mitigation measures will be identified if necessary.

Route, Stop, and Area Designations

This analysis uses U.S. Census Bureau 2015-2019 American Community Survey 5-year estimates and the Metropolitan Council's Travel Behavior Inventory On-Board Survey to designate:

- each route as either BIPOC or non-BIPOC and either low-income or non-low-income;
- each stop as either BIPOC or non-BIPOC and either low-income or non-low-income; and
- each census block group within the Metro Transit service area as either BIPOC areas or non- BIPOC areas and either low-income areas or non-low-income areas.

Doing so enables comparison of service outcomes and service standard and policy compliance rates between BIPOC and non-BIPOC routes/stops/areas and between low-income and non-low-income routes/stops/areas and subsequent determination of disparate impact and disproportionate burden.

Service Standards and Policies: Analysis Results

The following summarizes the service standards and policies Metro Transit uses to meet FTA requirements and the high-level results of the evaluations completed in this report.

⁶ Section 60-3.4(D), *Uniform Guidelines on Employee Selection Procedure* (1978); 43 FR 38295, August 25, 1978, <https://www.ecfr.gov/current/title-41/subtitle-B/chapter-60/part-60-3>.

Table i. Summary of Service Standards and Policies and their Analysis Results

Standard/Policy	What does it address?	What are the results?
Vehicle Load	<p>Metro Transit’s standards for what constitutes and “overloaded” (too crowded) vehicle accounts for seated and standing passengers and differs by route type and vehicle type</p>	<p>In fall 2019, trips scheduled on BIPOC routes were less likely to be overloaded (1.30% of observed trips) than those on non-BIPOC routes (2.12%). Therefore, this analysis identifies no disparate impact based on vehicle loads.</p> <p>Trips scheduled on low-income routes were less likely to be overloaded (1.21%) than those on non-low-income routes (2.98%) in fall 2019. Therefore, this analysis identifies no disproportionate burden based on vehicle loads.</p>
Vehicle Headway	<p>Metro Transit is required to set standards for how frequent service should be, given certain parameters, to ensure frequent service is not benefitting only certain people.</p> <p>Metro Transit’s vehicle headway standards are based on the route type, day period, and Transit Market Area.</p>	<p>BIPOC routes had higher vehicle headway compliance rates than non-BIPOC routes in both fall 2019 and fall 2020. Therefore, this analysis identifies no disparate impact based on vehicle headways.</p> <p>Low-income routes had higher vehicle headway compliance rates than non-low-income routes in both fall 2019 and fall 2020. Therefore, this analysis identifies no disproportionate burden based on vehicle headways.</p>

<p>On-Time Performance</p>	<p>Metro Transit measures whether a bus or train was on time for each instance it serves or passes a route’s scheduled timepoint by comparing the arrival time to that in the schedule.</p> <p>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.</p>	<p>BIPOC routes had higher on-time performance (85%) than non- BIPOC routes (81%) in fall 2019. Therefore, this analysis identifies no disparate impact based on on- time performance.</p> <p>In fall 2019, low-income routes had higher on-time performance (84%) than non-low-income routes (82%). Therefore, this analysis identifies no disproportionate burden based on on-time performance.</p>
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Standard/Policy	What does it address?	What are the results?
<p>Service Availability: Route Spacing</p>	<p>Route spacing guidelines seek to balance service coverage with route productivity and transit demand. Routes spaced too closely 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.</p> <p>Are BIPOC areas well-covered by routes, or are there large gaps in service? How does this coverage compare to that of non-BIPOC areas? How does this differ between low-income areas and non-low-income areas, if at all?</p>	<p>In both fall 2019 and fall 2020, route spacing results varied depending on route type and Transit Market Area. Generally, BIPOC areas and low-income areas experienced greater service coverage in Market Area I, but slightly worse service coverage (by two percent) in Market Area II, compared to non-BIPOC areas and non-low-income areas, respectively.</p> <p>However, all route spacing results are within the minimum threshold for avoiding disparate impact and disproportionate burden.</p> <p>Therefore, this analysis identifies no disparate impact nor disproportionate burden based on route spacing.</p>
<p>Service Availability: Midday Service</p>	<p>Midday service that operates frequently enough to meet the demand is crucial to developing a network that supports a transit-oriented lifestyle – one where transit is useful for more than the typical 9-to-5 work commute.</p> <p>Are BIPOC areas and low-income areas well-covered by midday service that meets vehicle headway standards? How does this coverage compare to that of non-BIPOC areas and non-low-income areas, respectively?</p>	<p>In both fall 2019 and fall 2020, BIPOC areas had greater midday service coverage than non-BIPOC areas, and low-income areas had greater midday service coverage than non-low-income areas.</p> <p>Therefore, this analysis identifies no disparate impact nor disproportionate burden based on midday service availability.</p>

Standard/Policy	What does it address?	What are the results?
Service Availability: Stop Spacing	<p>Stop spacing standards 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 on-board travel time.</p> <p>What percentage of stops along BIPOC routes have stops spaced too closely or too far apart, relative to the applicable standard range? How does this compare to stops along non-BIPOC routes? What are the dynamics based on income status?</p>	<p>In fall 2019, BIPOC routes had more instances of stops spaced within the standard ranges than non-BIPOC routes. Similarly, low-income routes performed better than non-low-income routes.</p> <p>Results were nearly identical using fall 2020 service. Therefore, this analysis identifies no disparate impact nor disproportionate burden based on stop spacing.</p>
Distribution of Amenities: At Bus Stops, Transit Centers, and Stations	<p>Metro Transit has developed policies for the distribution of customer information, seating, shelter, shelter lighting and heaters, and trash receptacles at the stops it serves. These policies differ by stop type, with standard and optional features varying for bus stops, stops at transit centers, and stops (platforms) at light rail, BRT, and commuter rail stations.</p>	<p>For all amenity types, at all stop types, amenity placement rates at BIPOC stops were greater than or equal to those at non-BIPOC stops; and amenity placement rates at low-income stops were greater than or equal to those at non-low-income stops. Therefore, this analysis identifies no disparate impact nor disproportionate burden based on the distribution of amenities at bus stops.</p>

Vehicle Assignment

Metro Transit maintains a fleet of about 1,000 vehicles across five bus garages and two light rail and one commuter rail depots.

Vehicle age is used as the standard measure for determining equitable vehicle assignment. Are newer and older vehicles distributed equitably throughout the system? Are newer vehicles assigned to non-BIPOC routes more often than BIPOC routes?

Are low-income routes assigned older vehicles than non-low-income routes?

In fall 2019, BIPOC route trips were assigned newer vehicles than non-BIPOC route trips, at 6.72 years and 7.01 years, respectively, on average.

Therefore, this analysis identifies **no disparate impact based on vehicle assignment.**

On average, low-income route trips were assigned vehicles approximately one year newer than those assigned to non-low-income route trips, at 6.62 years versus

7.64 years, respectively, in fall 2019. Therefore, this analysis identifies **no disproportionate burden based on vehicle assignment.**

Conclusions

This analysis identifies no disparate impact on BIPOC populations nor disproportionate burden on low-income populations based on Metro Transit’s Title VI standards and policies.

Most measures of compliance with Metro Transit’s service standards and policies showed that BIPOC and low-income populations received better outcomes, on average, compared to non-BIPOC and non-low-income populations. The few exceptions to this are instances where compliance rates for BIPOC or low-income populations were within one to eight percent of those for non-BIPOC or non-low-income populations – well within the allowable difference of 20 percent established in Metro Transit’s disparate impact and disproportionate burden thresholds.

Table ii. Disparate Impact and Disproportionate Burden Results Summary

Standard/Policy	Disparate Impact on BIPOC Population	Disproportionate Burden on Low-Income Population
Vehicle Load	No	No
Vehicle Headway	No	No
On-Time Performance	No	No
Service Availability	No	No
Route Spacing	No	No
Midday Service	No	No
Stop Spacing	No	No
Distribution of Amenities	No	No
At Bus Stops	No	No
At Transit Centers	No	No
At Stations	No	No
Vehicle Assignment	No	No

Title VI is one piece of the broader strategic framework that Metro Transit uses to meaningfully advance equity in the region. Broader equity work, including additional quantitative analysis, is ongoing and continuous at Metro Transit. Equity is not achieved through one sole program, project, policy, or procedure, but in the integration of equity work throughout the agency.

Despite the lack of actionable Title VI findings from this study, Metro Transit continues to evaluate its service and improve equity of inputs and outcomes and will continue to evaluate service for disparate impact and disproportionate burden outside of triennial FTA Title VI service monitoring

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Metropolitan Council

The Metropolitan Council (The 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. 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.

Metro Transit

Metro Transit 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 served nearly 78 million bus and rail passengers in 2019 with award-winning, energy-efficient fleets.

Title VI Commitment

The Metropolitan Council pledges that the public will have access to all its programs, services, and benefits without regard to race, color, or national origin, in accordance with Title VI of the Civil Rights Act of 1964. This pledge applies to Metro Transit, an operating division of the Metropolitan Council.

CHAPTER 1: INTRODUCTION

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. This report satisfies the Federal Transit Administration (FTA) Title VI requirement to monitor transit system performance relative to system-wide service standards and policies at least once every three years. This report, and Title VI compliance more generally, is one component of the broader equity and inclusion framework that Metro Transit uses to achieve its goals.

Purpose

The purpose of the Title VI service monitoring requirement is to **ensure that prior decisions related to the distribution of fixed route public transit service and facilities have not resulted in discrimination and a disparate impact on the basis of race, color, or national origin.** If such is found, “the transit provider shall take corrective action to remedy the disparities to the greatest extent possible, and shall discuss in the Title VI Program these disparate impacts and actions taken to remedy the disparities.”⁷

While not specifically required by FTA, Metro Transit expands its service monitoring to include assessment of disproportionate burden on low-income populations, a protected class under the Environmental Justice executive order.

To meet the Title VI service monitoring requirement, **service and facilities data from fall 2019 and fall 2020, and the latest residential and rider demographic data are compiled and analyzed relative to Metro Transit’s established service standards and policies.** Documented in its current [Title VI Program \(adopted in early 2020\)](#), Metro Transit’s service standards and policies relate to:

- Vehicle load: To prevent overcrowding
- Vehicle headway: How often service comes
- On-time performance: To prevent early and late service
- Service availability: Through route spacing, midday service, and stop spacing
- Distribution of transit amenities: To ensure fair access to bus shelters, customer information, and other facility amenities
- Vehicle assignment: To ensure access to newer vehicles is fairly distributed⁸

To meet the Title VI service monitoring requirement, service outcomes and compliance rates for each of these standards and policies are compared between routes (or stops or areas) designated as Black,

⁷ Federal Transit Administration, *Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients*, October 1, 2012, page IV-10, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf.

⁸ In its capacity as regional policy-making body and metropolitan planning organization (MPO), 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 the region’s multiple transit providers. However, Metro Transit has set and monitors additional standards and policies that are specific to its service delivery and requirements as a large urban transit provider. Metro Transit’s service standards and policies have the approval of the Metropolitan Council.

Indigenous, and People of Color (BIPOC) and those designated as non-BIPOC, and similarly between low-income and non-low-income routes (or stops or areas).

The following report addresses Title VI legislation; FTA requirements to meet Title VI obligations; the Council's Title VI Program, including its service standards and policies; recent performance relative to service standards and policies; and determinations of whether there is disparate impact to BIPOC populations and/or disproportionate burden to low-income populations based on service monitoring results.

Extent of Analysis

This analysis includes all regular fixed routes directly operated by Metro Transit and those operated under contract to the Metropolitan Council under the Metro Transit brand in either fall 2019 or fall 2020. Metro Transit historically uses data from the most recent fall schedule for service monitoring and broader analysis performed throughout the agency, as this time of year is most representative of transit demand and typical service levels. In light of COVID-19, service and ridership data analyzed in this report represent conditions from fall 2019 and/or fall 2020, depending on which data is more relevant.

The Metro Transit/Metropolitan Council service area (the outlined area in Figure 1) is defined as the Transit Capital Levy Communities, minus the communities served by the region's suburban transit providers: Minnesota Valley Transit Authority (MVTA), SouthWest Transit, and the cities of Maple Grove and Plymouth. Transit Capital Levy Communities are those within the seven-county region where a property tax is levied to pay for transit capital needs. The Transit Capital Levy Communities are established in state law but have changed in response to the growing region.

A Note on COVID-19 and its Impacts on Transit

While the long-term ridership impacts of the COVID-19 pandemic are not known, the short-term effects have been significant. Metro Transit modified its service levels and schedules throughout spring and summer 2020 as part of the ongoing, shared effort to respond to the COVID-19 pandemic. Service changes were made within the Governor's Peacetime Emergency declaration and in response to public health guidance and changes in travel demand, operations, and resources.

Service changes included suspension of some routes and reduced schedules on others. Vehicle capacity restrictions were put in place to allow adequate social distancing. Vehicle assignment was modified in some cases, resulting in the use of more articulated (60-foot) buses than typical.

In light of these factors, this study monitors service from fall 2019 and, where practical, fall 2020. Four local and 51 commuter and express routes regularly provided by Metro Transit remained suspended in Fall 2020; these routes are represented by fall 2019 service data in this analysis.

Equity and Inclusion

Title VI is one piece of the broader strategic framework that Metro Transit uses to define the goals and core elements that characterize our work. The number one core element that drives our strategic framework is meaningfully advancing equity inside our organization and in the region and one of the ways we do this is through evaluating our performance and fostering innovation for continuous

improvement. Equity is not achieved through one sole program, project, policy, or procedure, but in the integration of equity work throughout our agency.

Evaluation of Title VI Policies and Practices

Metro Transit and the Metropolitan Council continually seek ways to improve their Title VI policies, processes, and methods, including those related to service and fare equity analyses. For example, a multi-disciplinary work group of Metro Transit and Metropolitan Council staff recently completed a review of the agencies' current approach to Title VI service equity analyses and developed subsequent recommendations to improve existing practices. The goal of this effort was to discover opportunities to improve coordination and consistency across departments, and incorporate new dataset, methods, and other national best practices and innovations. The effort included a review of academic research and the Title VI policies and practices of about 30 transit agencies across the nation.

Recommendations resulting from this effort included:

- The use of more inclusive language, such as “communities of color” or “Black, Indigenous, and people of color” (BIPOC) in Title VI reports and documents, rather than “BIPOC,” the term used by FTA.
- The use of 185% poverty thresholds, rather than 100% poverty thresholds, to define “low- income” populations. This better aligns with other policies and practices of the Council and Metro Transit and is more reflective of conditions in the region.
- Where feasible, use of the street network to create more realistic distance/time-based service areas around bus stops and transit stations (e.g., 10-minute walk/roll from stops/stations), rather than using simplified straight line radial buffers that reflect distance/time “as the crow flies.”
- Where appropriate, incorporation of demographic data reflective of riders, from on-board surveys, to supplement or replace demographic data reflective of where folks live.

Each of these recommendations is reflected in this 2021 Title VI Service Monitoring Study.

CHAPTER 2: LEGISLATION AND GUIDANCE

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.”⁹

Moreover, FTA guidance recognizes the inherent overlap between Title VI and environmental justice principles, which extend protections to low-income populations. In 1994, President Clinton issued *Executive Order 12898 - Federal Actions to Address Environmental Justice in BIPOC Populations and Low-Income Populations*, 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 BIPOC populations and low-income populations.”¹⁰

Title VI was identified as one of several Federal laws that should be applied “to prevent BIPOC communities and low-income communities from being subject to disproportionately high and adverse environmental effects.”¹¹

To provide direction to recipients of federal funding, FTA issued *Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients* in 2012.¹² 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, including service monitoring.

Requirement to Conduct Service Monitoring

FTA requires recipients of federal funding who provide fixed route service, including Metro Transit, to **develop quantitative system standards and policies to guard against discrimination toward racial and ethnic minorities related to the quality of and access to transit service and facilities.**

FTA *Circular 4702.1B* provides the following as basis for the requirement:

Appendix C to 49 CFR part 21 provides in Section (3)(iii) that “[n]o person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of service of transportation service furnished as a part of the project on the basis of race, color, or national origin. Frequency of service, age and quality of vehicles assigned to routes, quality of stations

⁹ U.S. Department of Labor, *Title VI, Civil Rights Act of 1964*, <https://www.dol.gov/agencies/oasam/regulatory/statutes/title-vi-civil-rights-act-of-1964>.

¹⁰ U.S. President, Proclamation, *Executive Order 12898: Federal Actions To Address Environmental Justice in BIPOC Populations and Low-Income Populations*, Feb. 11, 1994, <https://www.archives.gov/files/federal-register/executive-orders/pdf/12898.pdf>.

¹¹ Federal Transit Administration, *Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients*, October 1, 2012, page I-6, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf.

¹² FTA, *Circular 4702.1B*.

serving different routes, and location of routes may not be determined on the basis of race, color, or national origin.¹³

In response to this directive, FTA *Circular 4702.1B* continues:

All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.... 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.^{14, 15}

Further, large urban fixed route transit providers, including Metro Transit, are **required to monitor performance relative to their system-wide service standards and policies at least once every three years**. While Metro Transit continually monitors its route and system-wide performance using a variety of measures (including incorporation of racial and socioeconomic equity), formal Title VI service monitoring to meet FTA requirements last occurred in fall 2018.

Title VI Definitions of BIPOC and Low-Income Populations Racial and Ethnic Minorities

FTA defines a “BIPOC” 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.¹⁶ However, as part of efforts to use respectful and inclusive language, **Metro Transit and the Metropolitan Council prefer to use the term Black, Indigenous, and People of Color (BIPOC) rather than “BIPOC” when referring to people who identify as one or more of the above racial or ethnic groups**. As such, references to BIPOC in this report should be interpreted to mean the same thing as “BIPOC”.

For the purposes of this evaluation, “non-BIPOC” or “non-BIPOC” persons are defined as those who self-identify as non-Hispanic white. All other persons, including those identifying as two or more races and/or ethnicities, are defined as BIPOC (equivalent to “BIPOC”).

FTA requires transit providers to evaluate service using this dichotomy between “BIPOC” and “non- BIPOC” populations. Focusing on the global “BIPOC” or BIPOC category (versus using disaggregated race and ethnicity data) obscures the racial and ethnic diversity of the many identities within it, treating BIPOC residents as interchangeable. To remedy this, Metro Transit and the Metropolitan Council are now using and providing more detail on race and ethnicity in their evaluations and data products. For example, as part of regular monitoring of route and system-wide

¹³ Federal Transit Administration, *Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients*, October 1, 2012, page IV-4, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf.

¹⁴ FTA, *Circular 4702.1B*, page IV-4

¹⁵ Fixed route refers to public transportation service provided in vehicles operated along pre-determined, regular routes according to a fixed schedule.

¹⁶ More specifically, Title VI *Circular 4702.1B* (page I-4) defines BIPOC persons as including the following identities: (1) 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; (2) 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; (3) Black or African American, which refers to people having origins in any of the Black racial groups of Africa; (4) Hispanic or Latino, which includes people of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race; and (5) 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.

performance (outside of the realm of Title VI), Metro Transit disaggregates transit performance by race and ethnicity for more power and knowledge by community.

Low-Income Population

While low-income populations are not an explicitly protected class under Title VI, FTA recognizes the inherent overlap between Title VI and environmental justice principles. Consequently, FTA encourages transit providers to conduct service monitoring with regard of low-income populations in addition to BIPOC populations, and to identify any disproportionate burden placed on low-income populations.

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 family/household size. 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 Title VI service monitoring analysis uses 185% of the 2019 U.S. Census Bureau poverty thresholds to determine low-income status. U.S. Census Bureau poverty thresholds use a more sophisticated measure of poverty that considers not only family/household size, but also the number of related children present, and, 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.¹⁷

The Metropolitan Council uses 185% of poverty thresholds to define poverty in its place-based equity research, regional policies, and other initiatives, and this Title VI analysis mirrors that approach.¹⁸ Table 1 lists 185% of the 2019 U.S. Census Bureau poverty thresholds that are used in this analysis.

¹⁷ The distinctions between poverty thresholds and guidelines are described further at <https://aspe.hhs.gov/frequently-asked-questions-related-poverty-guidelines-and-poverty>.

¹⁸ The use of 185% poverty thresholds differs from previous service monitoring studies, which used the 100% thresholds. The decision to use 185% thresholds was a result of a recent internal review of Metro Transit and the Council's Title VI service equity analysis practices, and research on those used by other agencies nationwide. The review found that half of the 26 transit agencies reviewed used a definition of "low income" that was more inclusive than the standard definition (100%) suggested by FTA in *Circular 4702.1B*. FTA allows agencies to set their own, more tailored definitions of what constitutes "low income," as long as they are at least as inclusive.

Table 1. 2019 U.S. Census Bureau Poverty Thresholds (185%) in Dollars

by Size of Family Unit and Number of Related Children Under 18 Years of Age

Size of Family Unit	Weighted Average Poverty Thresholds (\$)	None	One	Two	Three	Four	Five	Six	Seven	Eight or more
One Person (Unrelated Individual)	24,070									
Under 65 Years	24,605	24,606								
65 Years & Over	22,683	22,683								
Two People	30,564									
Householder Under 65 Years	31,813	31,671	32,600							
Householder 65 Years & Over	28,616	28,588	32,476							
Three People	37,620	36,996	38,069	38,106						
Four People	48,418	48,784	49,582	47,964	48,131					
Five People	57,389	58,831	59,686	57,858	56,444	55,581				
Six People	64,989	67,666	67,934	66,534	65,192	63,197	62,015			
Seven People	74,030	77,858	78,344	76,668	75,500	73,324	70,785	68,000		
Eight People	82,253	87,078	87,847	86,265	84,880	82,914	80,419	77,822	77,162	
Nine People or More	97,819	104,749	105,257	103,857	102,681	100,752	98,097	95,696	95,101	91,438

Source: U.S. Census Bureau; 100% of the 2019 poverty thresholds are available at <https://www.census.gov/data/tables/time-series/demo/income-poverty/historical-poverty-thresholds.html>.

Discrimination, Disparate Impact, and Disproportionate Burden

In *Circular 4702.1B*, FTA defines **discrimination** as referring 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.¹⁹

Disparate impact, a key concept for understanding Title VI regulations, is defined in the

Circulars as: 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.²⁰

Similarly, FTA defines **disproportionate burden** as:

a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations.²¹

¹⁹ Federal Transit Administration, *Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients*, October 1, 2012, page I-2, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Title_VI_FINAL.pdf.

²⁰ FTA, *Circular 4702.1B*, page I-2

²¹ FTA, *Circular 4702.1B*, page I-2

Per FTA guidance, Metro Transit uses its disparate impact and disproportionate burden thresholds as evidence of impacts severe enough to meet the definition of disparate impact or disproportionate burden.

Metro Transit has defined its disparate impact and disproportionate burden policies and thresholds using the “80% rule,” which states that there may be evidence of disparate impacts/disproportionate burden if:

- *Benefits* are being provided to *BIPOC/low-income* populations at a rate less than 80% of the benefits being provided to *non-BIPOC/non-low-income* populations, or
- *Adverse effects* are being borne by *non-BIPOC/non-low-income* populations at a rate less than 80% of the adverse effects being borne by *BIPOC/low-income* populations.

The 80% 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.²² The 80% rule suggests that a selection rate for any racial, ethnic, or gender group that is less than 80% 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 80% rule for its disparate impact and disproportionate burden thresholds was subject to a formal public outreach process before being adopted by the Metropolitan Council in 2013.

In this analysis, if the quantitative results indicate that service standard/policy compliance for BIPOC/ low-income routes (or stops or areas) is less than 80 percent of the compliance rate for non-BIPOC/ non-low-income routes (or stops or areas), this could be evidence of disparate impact/ disproportionate burden. In these cases, additional analysis will be conducted, and potential mitigation measures will be identified if necessary.

Additional information about how disparate impact and disproportionate policies are applied in this study can be found on page 27.

²² Section 60-3.4(D), *Uniform Guidelines on Employee Selection Procedure* (1978); 43 FR 38295, August 25, 1978, <https://www.ecfr.gov/current/title-41/subtitle-B/chapter-60/part-60-3>.

CHAPTER 3: SERVICE MONITORING CONCEPTS AND DEFINITIONS

The following section establishes concepts and definitions used to guide and evaluate transit service, including those:

- used by the Metropolitan Council to establish regional transit design guidelines and performance standards and by Metro Transit to establish Title VI service standards and policies; and those
- used by Metro Transit to evaluate compliance with its Title VI service standards and policies, following FTA guidance documented in the Title VI *Circular 4702.1B*.

These concepts and definitions are critical context for understanding Metro Transit's service standards and policies and are referenced throughout this report.

Concepts and Definitions to Establish Standards and Policies

Route Types

For the purposes of developing regional transit design guidelines and performance standards, the Metropolitan Council coordinates the classification routes in the regional transit network (including Metro Transit's) based on their mode and role within the overall network. Metro Transit incorporates these route type into several of its service standards and policies.

Route types represented among the 152 Metro Transit fixed routes evaluated in this report include:

- Core Local Bus
- Supporting Local Bus
- Suburban Local Bus
- Commuter and Express Bus
- Arterial Bus Rapid Transit
- Highway Bus Rapid Transit
- Light Rail
- Commuter Rail

Each regular fixed route is assigned one route type, though most routes serve multiple route purposes. Route types were assigned to individual routes based on their primary purpose. For example, a route assigned the commuter and express route type may have one or more segments that act more like one of the local route types (e.g., local service in a suburban neighborhood before or after serving a park & ride), but that are not reflective of the primary purpose of the route.

Appendix A: Route Types includes detailed route type definitions. A list of Metro Transit fixed routes by route type is included in Appendix B: Route Designations.

Transit Market Areas

Metro Transit's service standards related to vehicle headway and service availability differ by Transit Market Area. The Metropolitan Council and Metro Transit use Transit Market Areas as a tool used to guide transit planning decisions and 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. Expected demand for transit service varies across the region. While this variation is driven by a number of factors, in the Twin Cities region it is primarily due to differences in development density, urban form, and demographics. To account for these differences in the planning and evaluation of transit service, the region is divided into five distinct Transit Market Areas – I, II, III, IV, and V – representing different levels of potential transit demand.

Transit Market Area I represents urban center communities that have a more traditional urban form with a street network laid out in grid form. Market Area I has the potential transit ridership necessary to support the most intensive fixed-route transit service, typically providing higher frequencies, longer hours, and more options available outside of peak periods. At the other end of the spectrum, Transit Market Area V tends to be primarily rural communities and agricultural uses. General public dial-a-ride service may be appropriate here, but due to the very low-intensity land uses these areas are not well-suited for fixed-route transit service. All five market areas are represented in the Metro Transit service area.

More information on Transit Market Areas can be found in Appendix G of the Metropolitan Council's *2040 Transportation Policy Plan*. A map of Transit Market Areas in the region is included in Appendix C: Transit Market Areas of this report.

Concepts and Definitions to Evaluate Compliance with Standards and Policies

Demographic Area Types

FTA *Circular 4702.1B* establishes the following concept that is critical for conducting service monitoring in compliance with FTA requirements:

Predominantly BIPOC area means a geographic area, such as a neighborhood, Census tract, block or block group, or traffic analysis zone, where the proportion of BIPOC persons residing in that area exceeds the average proportion of BIPOC persons in the recipient's service area.^{23, 24}

This "predominance" concept applies similarly to low-income areas. The concept is incorporated into the methodology for designating each Metro Transit fixed route as either BIPOC or non-BIPOC and either low-income or non-low-income (described in the following

section).

To simplify terminology, **“predominantly BIPOC areas” are herein referred to as “BIPOC areas,”** and are defined as census block groups where BIPOC residents make up at least 31.3% of residents, the average across Metro Transit’s service area as a whole. BIPOC areas within the Metro Transit service area are shown in Figure 1. BIPOC areas make up 39% of census block groups and 22% of the geographic (surface) area of the Metro Transit service area and are home to 40% of the service area's total population (regardless of race and ethnicity).

Similarly, **“predominantly low-income areas” are herein referred to as “low-income areas,”** and are defined as census block groups where low-income residents make up at least 22.8% of residents, the average across Metro Transit’s service area. Low-income areas within the Metro Transit service area

²³ FTA, *Circular 4702.1B*, page I-5

²⁴ Per *Circular 4702.1B*, service area in this context refers to the geographic area in which a transit agency is authorized by its charter to provide service to the public (page I-5).

are shown in Figure 2. Low-income areas make up 38% of census block groups and 20% of the geographic area of the Metro Transit service area and are home to 38% of the service area's total population.

This study uses U.S. Census Bureau 2015-2019 American Community Survey 5-year estimates at the block group level to determine the Metro Transit service area averages for percent BIPOC residents (31.3%) and percent low-income residents (22.8%).

Figure 1. BIPOC Areas within the Metro Transit Service Area

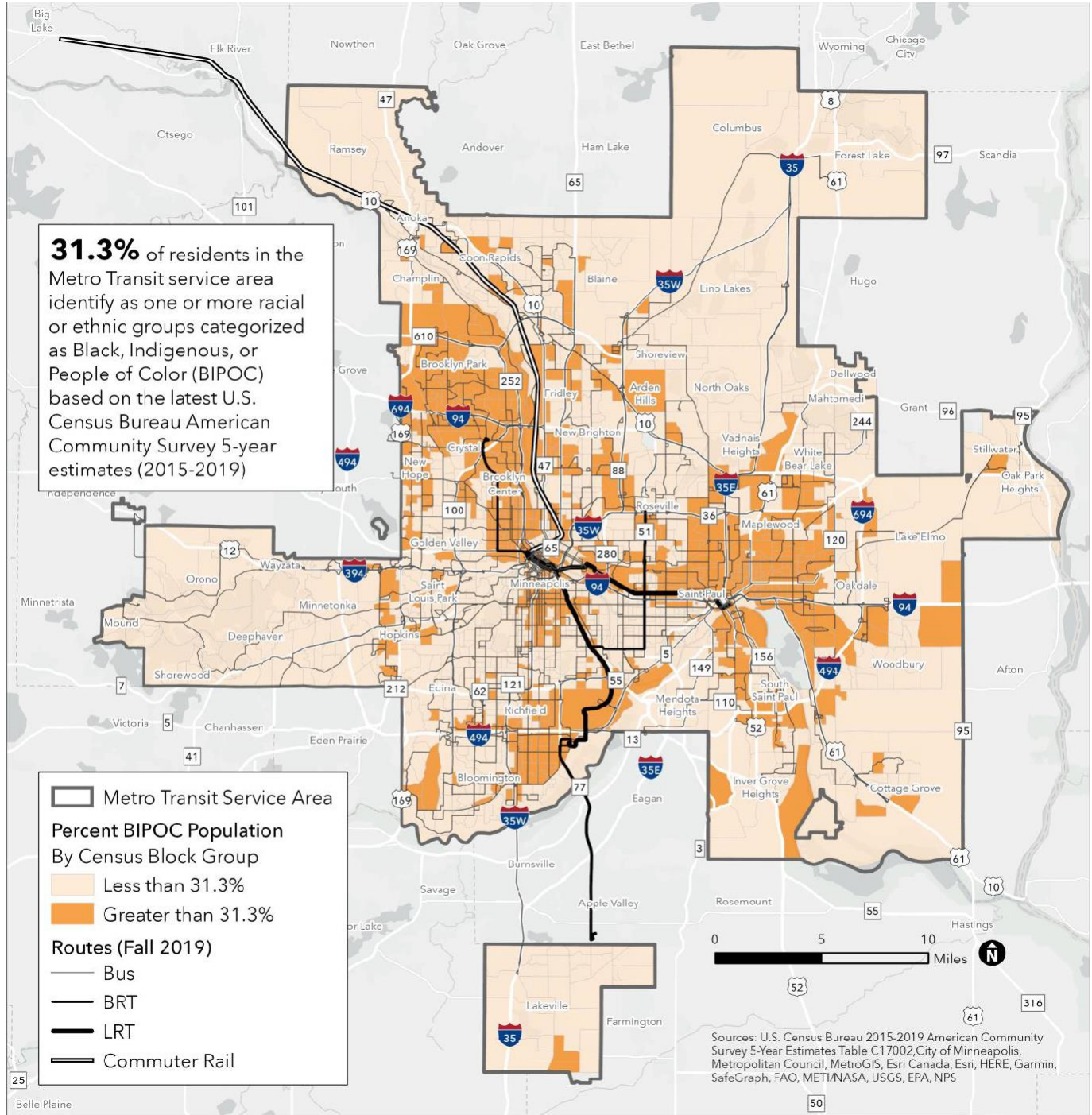
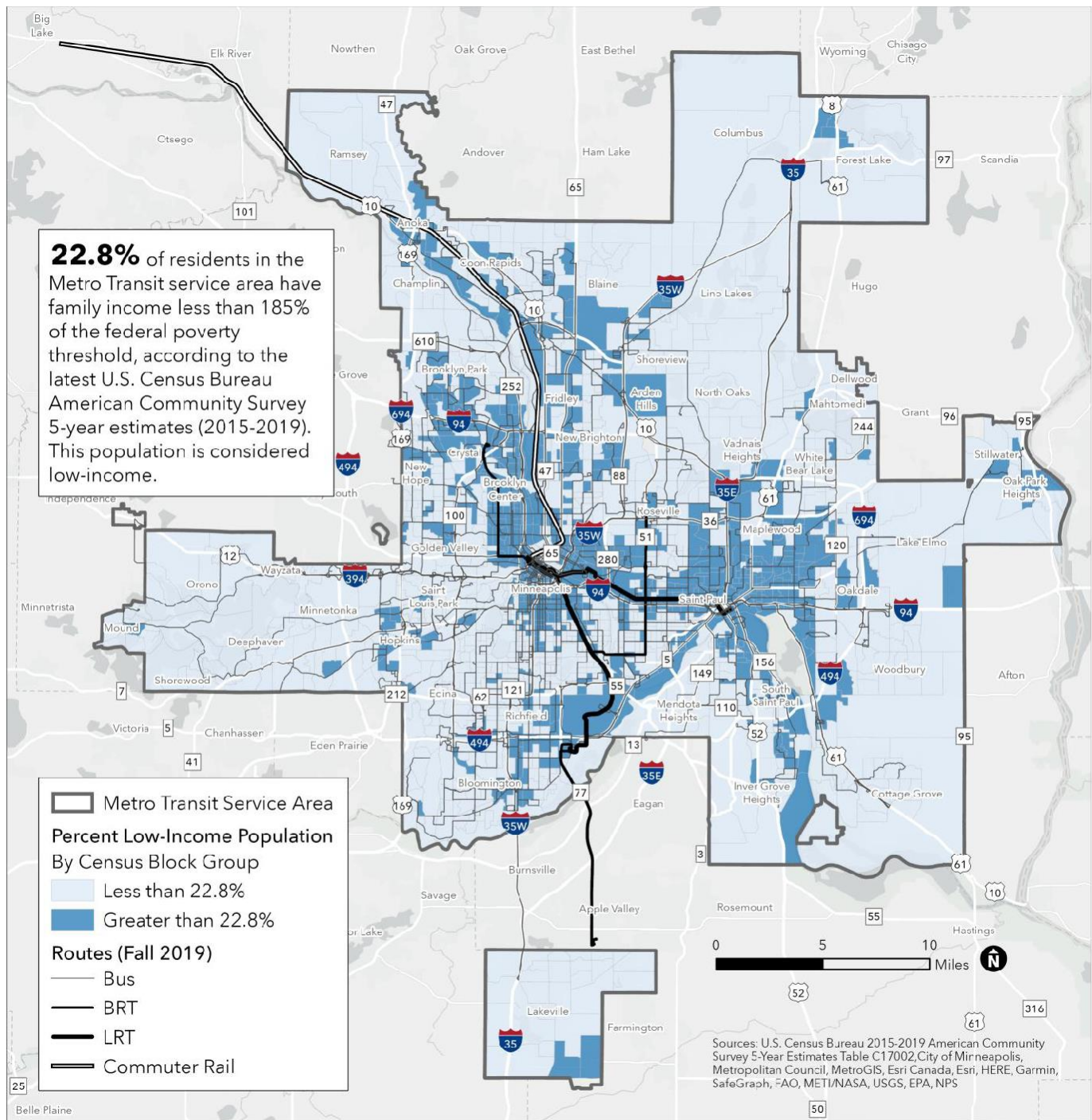


Figure 2. Low-Income Areas within the Metro Transit Service Area



Route Designations

For the purposes of this analysis, **each route is designated as either BIPOC or non-BIPOC and either low-income or non-low-income.** Doing so enables comparison of service outcomes and service standard and policy compliance rates between BIPOC and non-BIPOC routes and between low-income and non-low-income routes and subsequent determination of disparate impact and disproportionate burden. Summarized in Table 2, 55% of the 152 routes included in this study are considered BIPOC routes, while 51% are considered low-income routes. Local routes – particularly core local bus and suburban local bus route types – are more likely to be designated as either BIPOC

or low-income (73-85% of routes) compared to commuter and express routes (16-37% of routes). See Appendix B: Route Designations for a list of all 152 routes analyzed in this study alongside their designations.

Table 2. Summary of Route Designations by Route Type

Route Type	Number of Routes	BIPOC	Non-BIPOC	Low-Income	Non-Low-Income
Core Local	34	76%	24%	85%	15%
Supporting Local	13	62%	38%	77%	23%
Suburban Local	26	73%	27%	85%	15%
Commuter and Express	73	37%	63%	16%	84%
Arterial BRT	2	50%	50%	100%	0%
Highway BRT	1	0%	100%	0%	100%
Light Rail	2	100%	0%	100%	0%
Commuter Rail	1	0%	100%	0%	100%
All Routes	152	55%	45%	51%	49%

FTA provides guidance on how routes are to be designated for service monitoring purposes. Central to the FTA methodology is the relationship between the demographics of the population living within a route’s service area and those of the population living in the system-wide service area (described in the previous section, shown in Figure 1 and Figure 2). FTA’s methodology states that if one-third of a route’s service area is in areas with BIPOC population greater than the system-wide service area average (31.3% in this study) then that route is to be designated as a BIPOC route. The same methodology is applied for designating routes as either low-income or non-low-income.

Further, FTA *Circular 4702.1B* states that agencies, “may supplement this service area data with route- specific ridership data in cases where ridership does not reflect the characteristics of [the service area],” and adjust route designations accordingly.²⁵ As such, Metro Transit used route-specific ridership data from the Metropolitan Council’s Transit Behavior Inventory (TBI) On-Board Survey to refine route designations in this study. Other modifications were made to FTA’s route designation methodology to more accurately reflect the population served by routes, but without deviating from the reasoning of the original methodology. These modifications include the elimination of non-stop route segments and incorporation of park & ride user data for defining a route’s service area. A detailed description of the methodology used to designate routes in this study is included in Appendix D: Route Designation Methodology.

Stop Designations

Metro Transit’s distribution of transit amenities policies guide the type of amenities (e.g., shelter, real- time signs, etc.) that are provided at transit stops and help the agency plan and prioritize investments. Assessment of how amenities have been distributed in light of these policies determines whether transit users have equitable access to these amenities.

²⁵ FTA, *Circular 4702.1B*, page I-4

Metro Transit maintains thousands of stops that are served by one or more of its fixed routes. Stops in this study are defined as permanent or semi-permanent, marked locations where passengers can get on and/or off a fixed route vehicle, according to public route schedules. Stops include both bus stops as well as station platforms served by BRT, light rail, or commuter rail lines. Further, stops can be located at various facility types, including park & rides, transit centers, and stations.

This analysis considers the **11,912 stops served by Metro Transit routes in either fall 2019, fall 2020, or both periods. Each stop is designated as either BIPOC or non-BIPOC and either low-income or non-low-income.** This enables comparison of policy compliance rates and subsequent determination of disparate impact and disproportionate burden. Forty-five percent of stops included in this study are considered BIPOC stops, while 47% are considered low-income stops.

FTA does not prescribe a method for designating stops as either BIPOC or non-BIPOC and either low-income or non-low-income. The method used in this study uses the relationship between the demographics of the population living in the system-wide service area and those of the population living within the influence area of the stop – defined as a 10-minute walk from the stop using the existing street and sidewalk network.

A stop is designated as BIPOC if the proportion of BIPOC residents within a 10-minute walk from the stop exceeds the system-wide service area average (31.3% in this study). The same approach is applied for designating stops as either low-income or non-low-income. Each stop is considered in isolation, without regard to the route(s) that serve it or nearby stops. Importantly, this approach does not account for the demographics of those for whom an area is a destination, only those living near the stop.

When the 10-minute walkshed from the stop crosses multiple census block groups, the population from those block groups is distributed to the walkshed in proportion to the block group area inside it. This mirrors the method used by Metro Transit's Strategic Initiatives division for other equity work across the agency.

CHAPTER 4: ANALYSIS METHODS AND RESULTS

The following sections describe the analysis and results for the evaluation of each of the service standard and policy types required by FTA. In light of the impact of COVID-19 on transit demand and Metro Transit's service and ridership, this study monitors service from fall 2019 and, where practical, fall 2020.²⁶

The study includes all 152 fixed routes that operated in either fall 2019 or fall 2020. This includes 33 routes provided by the Metropolitan Council under the Metro Transit brand. These are contracted routes overseen by the Council's Metropolitan Transportation Services (MTS), including the METRO Red Line (highway BRT). These routes are sometimes referred to as "MTS routes," but are fully integrated into Metro Transit's service and facility planning functions.

In keeping with FTA guidance, service monitoring results are reported by mode; that is, separately for bus (all bus route types, including arterial BRT and highway BRT), light rail (METRO Blue Line and METRO Green Line), and commuter rail (Northstar).²⁷

The results for light rail and Northstar are shown primarily for informational purposes and comparison with other route types. Metro Transit has only one commuter rail route, and both of the light rail lines are identified as both BIPOC and low-income routes. It is therefore impossible to make comparisons between BIPOC and non-BIPOC and low-income and non-low-income routes within the light rail and commuter rail route types.

Comparison Index

For each service standard and policy, determinations of disparate impact and disproportionate burden are made by calculating a comparison index between the BIPOC and non-BIPOC results and between the low-income and non-low-income results. **The comparison index is the tool used by Metro Transit to apply its disparate impact and disproportionate burden policies (see page 19).**

In cases where the results measure an *adverse impact* (e.g., vehicle overloads), the comparison index is measured as the ratio between the non-BIPOC/non-low-income results and the BIPOC/low-income result. A higher ratio is better and indicates relatively less negative impact on BIPOC/low-income people.

Alternatively, in cases where the results measure a *positive impact* (e.g., compliance with vehicle headway standards), the comparison index is measured as the ratio between the BIPOC/low-income results and the non-BIPOC/non-low-income results. A higher ratio is better and indicates more benefit to BIPOC/low-income people.

In either case, a comparison index less than 0.80 indicates the potential for disparate impact/disproportionate burden.

²⁶ For example, vehicle load standards were assessed only for fall 2019, given the dramatic reduction in transit demand in fall 2020 due to COVID-19 and the presence of vehicle capacity restrictions to slow spread of the virus. Alternatively, route spacing standards were assessed for both fall 2019 and fall 2020, as Metro Transit had direct influence over how it distributed service in light of COVID-19.

²⁷ These mode classifications – bus, light rail, and commuter rail – mirror how Metro Transit reports to the National Transit Database (NTD).

Vehicle Load Standards

Vehicle load refers to the number of passengers aboard an in-service transit vehicle at a given time. Metro Transit’s vehicle load standards are defined by route type and vehicle type for peak (weekdays from 6:00-9:00 AM and 3:00-6:30 PM) and off-peak periods (Table 3). The numerical standards represent the maximum number of passengers (seated and standing combined) allowable before an “overload” occurs. In addition to route type, vehicle type, and day period, the standards were developed considering the average seating capacity of vehicles. In many cases, the off-peak load standard represents the number of seats available for that vehicle type (see *Vehicle Assignment* for more information on vehicle types).

While the availability of seating is a contributing factor to a pleasant transit experience, it is not always feasible during peak periods. Standing loads – that is, a vehicle load in excess of the seating capacity – are considered acceptable in some instances, such as on light rail vehicles and during peak service.

The primary exception to this is peak loads on commuter and express routes with more than four miles of travel on freeways, where the load standards are equal to seating capacity regardless of time of day. This difference is due to safety needs of highway travel, as well as the relative lack of seat turn- over and greater distances traveled by passengers compared to other route types.

Table 3. Vehicle Load Standards

Load standards represent the maximum number of passengers (seated and standing combined) allowable

	Route Type	Vehicle 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 and Express (> 4 Miles on Freeway)		Standard 40’ bus	38	38
		Articulated 60’ bus	57	57
		Coach bus	57	57
Commuter and 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

Methods

Vehicle load data are continuously collected aboard buses using automatic passenger counter (APC) equipment. However, similar vehicle load data are not available for all light rail or Northstar commuter rail trips. Periodic in-person spot checks of the light rail 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 were identified for either route type during standard (non-event-related) service since the last service monitoring report in fall 2018.

This analysis considers weekdays from fall 2019. Weekdays are used given the reduced demand and rarity of overloads on weekend days. Fall 2020 data are not considered given the dramatic reduction in demand and vehicle capacity restrictions in place in fall 2020 to ensure social distancing in light of COVID-19.

The unit of analysis is a scheduled weekday trip. The maximum passenger load is identified for each trip observation. Overloaded trips are identified by comparing the observed maximum passenger load to the appropriate load standard (Table 3) based on the trip attributes (i.e., route type, vehicle type, and peak versus off-peak). The number of total trips and overloaded trips are then aggregated by route and scheduled trip number. On average, each scheduled trip (e.g., the weekday trip on Route 99 departing at 7:45 AM) had load observations on 55 days across fall 2019.

Occasional overloads are to be expected due to natural variations in transit demand and special events. Metro Transit considers trip overloads to be an issue needing to be addressed if they are “consistently overloaded.” Individual route trips (e.g., the weekday trip on Route 99 departing at 7:45 AM) are considered to be consistently overloaded if they experience an overload on two or more days per five weekdays. Because a trip has an equal probability of being sampled on any weekday, this review considers a trip that was overloaded 40 percent or more of the time (two days per five-day week) to be consistently overloaded.

In summary, compliance with the vehicle load standards is measured in two ways:

- Percent of trips observations *overloaded*, defined as the proportion of all observed completed trips that exceed overload standards at some point during the trip; and
- Percent of scheduled trips *consistently overloaded*, defined as an individual route trip where greater than 40 percent of its observed completed trips (e.g., 23 out of 55 trip observations) are overloaded at some point during the trip.

Each of these measures is calculated by race/ethnicity and income route designations. Trips are first aggregated by route designation (e.g., total trips scheduled on BIPOC routes), then the aggregate is evaluated.

Results

Over the course of fall 2019, just 1.54% of all observed bus trips were overloaded. The analysis results by route designation are summarized in Table 4. Vehicle load results by route are included in Appendix E: Vehicle Load.

Trips scheduled on BIPOC routes were less likely to be overloaded (1.30% of observed trips) than those on non-BIPOC routes (2.12%). The resulting comparison index of 1.63 ($2.12\%/1.30\% = 1.63$) is greater than 1.00, indicating more advantageous results for BIPOC routes. Similarly, BIPOC routes

were less likely to have trips that were consistently overloaded (0.15% of schedule trips) compared to non-BIPOC routes (0.56%). The resulting comparison index of 3.73 is greater than 1.00, indicating more advantageous results for BIPOC routes. **Therefore, this analysis identifies no disparate impact based on vehicle loads.**

Table 4. Vehicle Load Standards Results

Mode	Route Designation	Percent of Weekday Trip Observations with an Overload	Percent of Scheduled Weekday Trips Consistently Overloaded
Bus	BIPOC Routes	1.30%	0.15%
	Non-BIPOC Routes	2.12%	0.56%
	DI Comparison Index	1.63	3.73
	Low-Income Routes	1.21%	0.17%
	Non-Low-Income Routes	2.98%	0.75%
	DB Comparison Index	2.46	4.41

*Both LRT lines are designated as BIPOC and low-income routes, thus, there is no comparison index

^The sole commuter rail line (Northstar) is designated as a non-BIPOC and non-low-income route, thus, there is no comparison index

Shown in Table 4, trips scheduled on low-income routes were less likely to be overloaded (1.21% of observed trips) than those on non-low-income routes (2.98%). The resulting comparison index of 2.46 is greater than 1.00, indicating more advantageous results for low-income routes. Similarly, low-income routes were less likely to have trips that were consistently overloaded (0.17% of schedule trips) compared to non-low-income routes (0.75%). The resulting comparison index of 4.41 is greater than 1.00, indicating more advantageous results for low-income routes. **Therefore, this analysis identifies no disproportionate burden based on vehicle loads.**

Vehicle Headway Standards

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 traveling in the same direction. A smaller headway equates to more transit vehicles, higher frequency, and a greater level of service along a corridor. Routes serving areas of higher transit demand will tend to have smaller/shorter headways (higher frequency service).

Metro Transit’s vehicle headway standards represent the minimum level of service allowable to meet the standard. Shown in Table 5, vehicle headway standards differ by route type, day period (peak, off-peak, and weekend), and Transit Market Area. Peak is defined as weekday trips predominantly occurring between 6:00 and 9:00 AM or between 3:00 and 6:30 PM. Off-peak encompasses trips predominantly occurring during the remaining time during weekdays, and weekend applies to all trips throughout the day on Saturdays and Sundays.

Table 5. Vehicle Headway Standards

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

Methods

Calculation of vehicle headways is completed using schedules derived from generalized transit feed specification (GTFS) data from a representative week in fall 2019 and fall 2020. Trips counts are calculated for each route by stop, day type (i.e., weekday, Saturday, Sunday), and time of day (AM peak, midday, PM peak). Day type and time of day are combined to mirror the day period scheme (i.e., peak, off-peak, weekend) used in the vehicle headway standards (Table 5). Trip counts are then categorized into three representative day periods using the following parameters:

- Peak, including weekday trips at stops occurring between 6:00 and 9:00 AM or between 3:00 and 6:30 PM;
- Off-peak, including weekday trips at stops occurring between 11:00 AM and 2:00 PM; and
- Weekends, including trips at stops occurring between 11:00 AM and 2:00 PM on weekends.

Route type and Transit Market Area are then attributed to each unique route-stop-day period combination to match the scheme of Metro Transit's vehicle headway standard. Next, the scheduled headway for each route-stop-day period combination is calculating by dividing the duration of the day period (e.g., 3 hours for off-peak) by the count of schedule trips during that

day period. The result is compared to the headway standard corresponding to the combination's route type, Transit Market Area, and day period. Results are then aggregated to the route level and route designation level (e.g., BIPOC route versus non-BIPOC route) to calculate the percent of route-stop combinations meeting the headway standard. This process is repeated for both fall 2019 and fall 2020 schedules.

This analysis evaluates 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.

Results

Table 6 and Table 7, summarize the percent of route-stop combinations meeting the vehicle headway standards for each mode by route designation and day period in fall 2019 and fall 2020, respectively.

Table 6. Vehicle Headway Standards Results (2019)

Percent of route-stop combinations meeting headway standards

Mode	Route Designation	Peak	Off-Peak	Weekend	Total
Bus	BIPOC Routes	56%	95%	78%	72%
	Non-BIPOC Routes	61%	96%	73%	69%
	DI Comparison Index	0.92	0.99	1.07	1.04
	Low-Income Routes	59%	95%	79%	74%
	Non-Low-Income Routes	55%	92%	52%	57%
	DB Comparison Index	1.07	1.03	1.52	1.30
Light Rail*	BIPOC Routes	100%	100%	95%	98%
	Low-Income Routes	100%	100%	95%	98%
Commuter Rail^	Non-BIPOC Routes	0%	--	--	0%
	Non-Low-Income Routes	0%	--	--	0%

*Both LRT lines are designated as BIPOC and low-income routes, thus, there is no comparison index

^The sole commuter rail line (Northstar) is designated as a non-BIPOC and non-low-income route, thus, there is no comparison index

Table 7. Vehicle Headway Standards Results (2020)

Percent of route-stop combinations meeting headway standards

Mode	Route Designation	Peak	Off-Peak	Weekend	Total
Bus	BIPOC Routes	55%	95%	77%	71%
	Non-BIPOC Routes	46%	96%	72%	63%
	DI Comparison Index	1.20	0.99	1.07	1.13
	Low-Income Routes	56%	96%	78%	73%
	Non-Low-Income Routes	32%	91%	50%	45%
	DB Comparison Index	1.75	1.05	1.56	1.62
Light Rail	BIPOC Routes	100%	100%	91%	96%
	Low-Income Routes	100%	100%	91%	96%
Commuter Rail	Non-BIPOC Routes	0%	--	--	0%

Regardless of day period, BIPOC routes had higher compliance rates than non-BIPOC routes in both 2019 (72% versus 69%, Table 6) and 2020 (71% versus 63%, Table 7). Compared to non-BIPOC routes, BIPOC routes had higher compliance on weekends, about the same during off-peak, and mixed results during the peak. Peak period compliance of BIPOC routes was less than that of non-BIPOC routes in 2019, though this pattern reversed in 2020.

In all day periods in both years, the BIPOC routes to non-BIPOC routes comparison indices related to vehicle headway standards are above the 0.80 minimum threshold for avoiding disparate impact. **Therefore, this analysis identifies no disparate impact based on vehicle headways.**

Low-income routes performed better in terms of vehicle headway compliance than non-low-income routes in all day periods in both years. The resulting comparison indices are all greater than 1.00, indicating more advantageous results for low-income routes. **Therefore, this analysis identifies no disproportionate burden based on vehicle headways.**

On-Time Performance Standards

On-time performance standards are differentiated for bus and rail service.

- 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.²⁸

Metro Transit's on-time performance goal for each service mode is updated quarterly to account for seasonal factors and specific construction activity.

Methods

On-time performance data for bus routes 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 rail service.

Data from fall 2019 are used in this analysis. Fall 2020 on-time performance data are not considered given the dramatic reduction in traffic levels and transit demand at that time due to COVID-19, and the vehicle capacity restrictions in place at that time to slow spread of the virus.

The fall 2019 dataset used for analysis includes the number of on-time timepoint crossing observations, according to the appropriate on-time definition by mode, and total timepoint crossing observations by route and day type. On-time timepoint crossings and total timepoint crossings are summed by route and route designation to determine the percentage of on-time timepoint crossings.

²⁸ Metro Transit recently updated the on-time definition for rail service to be between 1 minute early and 5 minutes late, matching that of bus service. This change was made following an internal review of service reliability metrics that considered processes, performance, communication with the public, and connection to agency goals. This service monitoring study continues to use the -1 minute to +4 minute on-time definition for rail service, as documented in the most recent Metropolitan Council Title VI Program. However, the next Title VI Program update will reflect the new policy and practice of using -1 minute to +5 minutes.

Results

Table 8 summarizes the percent of timepoint crossings considered on-time for each mode by route designation in fall 2019. Appendix F: On-Time Performance includes a table of on-time performance by route.

Table 8. On-Time Performance Standards Results

Percent of timepoint crossings considered on-time

Mode	BIPOC Designation	On-Time Performance
Bus	BIPOC Routes	85%
	Non-BIPOC Routes	81%
	DI Comparison Index	1.05
	Low-Income Routes	84%
	Non-Low-Income Routes	82%
	DB Comparison Index	1.02
Light Rail	BIPOC Routes	78%
	Low-Income Routes	78%
Commuter Rail	Non-BIPOC Routes	94%
	Non-Low-Income Routes	94%

Among bus routes, BIPOC routes had higher on-time performance than non-BIPOC routes in 2019, with 85% of trip timepoint crossings on time compared to 81%, respectively (Table 8). The resulting comparison index of 1.05 ($85\%/81\% = 1.05$) is greater than 1.00, indicating more advantageous results for BIPOC routes. **Therefore, this analysis identifies no disparate impact based on on-time performance.**

Low-income bus routes had higher on-time performance (84%) than non-low-income routes (82%) in 2019 (Table 8). The resulting comparison index of 1.02 ($84\%/82\% = 1.02$) is greater than 1.00, indicating more advantageous results for low-income bus routes. **Therefore, this analysis identifies no disproportionate burden based on on-time performance.**

Service Availability: Route Spacing Standards

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 spaced too closely 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 9 shows the route spacing standards, which differ by route type and Transit Market Area. Route spacing for commuter and express bus, highway and arterial BRT, light rail, and

commuter rail routes are determined on a case-by-case basis according to specific transit market conditions

Table 9: Route Spacing Standards

Route Type	Market Area I	Market Area II	Market Area III	Market Area IV	Market Area V
Core Local*	0.5 miles	1 mile	Specific**	n/a	n/a
Supporting Local	1 mile	1-2 miles	Specific**	n/a	n/a
Suburban Local	n/a	2 miles	Specific**	Specific**	n/a

*Local limited stop routes do not follow a route spacing standard. 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

Metro Transit’s route spacing standards are defined for core local, supporting local, and suburban local bus route types within Transit Market Areas I and II (Table 9). The function and purpose for the routes evaluated under the route spacing criteria are as follows:

- **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** routes are typically designed to provide crosstown connections within Market Areas I and II. Usually, 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** 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.

Appendix A: Route Types summarizes the function and purpose for all route types. Each regular fixed route is assigned one route type, though most routes serve multiple route purposes. Route types were assigned to individual routes based on their primary purpose. For example, a route assigned the commuter and express route type may have one or more segments that act more like one of the local route types (e.g., local service in a suburban area before or after serving a park & ride).

Methods

Analysis of route spacing standards compliance is completed using route lines derived from GTFS data from a representative week in fall 2019 and fall 2020. Individual analyses are conducted for core local routes in Market Area I and supporting local routes in Market Area I for both periods. To do so, buffers are created around each route line using geographic information system (GIS) software. For example, a half-mile buffer (half of the one-mile spacing standard) is created around all core local routes. Any areas left out of the buffer areas would not meet the spacing standard for core local routes in Market Area I. For each of the two analyses, the buffer coverage area is overlaid against census block groups in order to compare between demographic area types (i.e., BIPOC areas versus non-BIPOC areas; see *Demographic Area Types*). The proportion of BIPOC areas meeting the route spacing standard is compared to the proportion of non-BIPOC areas meeting the standard, and likewise for low-income versus non-low-income areas.

In Market Area II, service is provided with a mix of core local, supporting local, and suburban local routes. Their three separate standards are simplified into a consistent (and more stringent) one-mile standard, and one analysis is conducted for all three route types. The process is otherwise identical to that used to assess compliance in Market Area I.

Results

The results of these analyses are shown in Table 10 and Table 11. Maps showing the coverage areas are included in Appendix G: Route Spacing.

Table 10: Route Spacing Results (2019)

Route Type – Market Area	BIPOC Designation	Percent of Area Served	Income Designation	Percent of Area Served
Core Local – I	BIPOC Areas	93.2%	Low-Income Areas	93.5%
	Non-BIPOC Areas	90.9%	Non-Low-Income Areas	89.1%
	DI Comparison Index	1.03	DB Comparison Index	1.05
Supporting Local– I	BIPOC Areas	68.5%	Low-Income Areas	69.4%
	Non-BIPOC Areas	62.0%	Non-Low-Income Areas	56.6%
	DI Comparison Index	1.11	DB Comparison Index	1.23
Core Local, Supporting Local, Suburban Local – II	BIPOC Areas	95.7%	Low-Income Areas	95.4%
	Non-BIPOC Areas	97.1%	Non-Low-Income Areas	97.3%
	DI Comparison Index	0.98	DB Comparison Index	0.98

Table 11: Route Spacing Results (2020)

Route Type – Market Area	BIPOC Designation	Percent of Area Served	Income Designation	Percent of Area Served
Core Local – I	BIPOC Areas	90.3%	Low-Income Areas	91.1%
	Non-BIPOC Areas	90.7%	Non-Low-Income Areas	88.7%
	DI Comparison Index	1.00	DB Comparison Index	1.03
Supporting Local– I	BIPOC Areas	56.5%	Low-Income Areas	56.3%
	Non-BIPOC Areas	52.2%	Non-Low-Income Areas	50.8%
	DI Comparison Index	1.08	DB Comparison Index	1.11
Core Local, Supporting Local, Suburban Local – II	BIPOC Areas	95.3%	Low-Income Areas	95.2%
	Non-BIPOC Areas	97.2%	Non-Low-Income Areas	97.1%
	DI Comparison Index	0.98	DB Comparison Index	0.98

In Market Area II in 2019 and 2020, BIPOC areas had slightly less coverage than non-BIPOC areas, and low-income areas had slightly less coverage than non-low-income areas, as indicated by comparison indices slightly below 1.00 (Table 10, Table 11). In Market Area I in 2019 and 2020, both core local and supporting local routes provide slightly more coverage in BIPOC and low-income areas compared to non-BIPOC and non-low-income, respectively, as indicated by comparison indices greater than 1.00. An exception to this is core local routes in Market Area I in 2020, where non-BIPOC areas had slightly higher coverage rates than BIPOC areas (90.7% versus 90.4%).

All comparison indices in Table 10 and Table 11 are above the 0.80 minimum threshold for avoiding disparate impact and disproportionate burden. **Therefore, this analysis identifies no disparate impact nor disproportionate burden based on route spacing.**

Service Availability: Midday Service Standards

In addition to route and stop spacing standards, Metro Transit reviews service availability based on the presence of transit service that meets vehicle headway standards during the midday period. This standard is used as another means to ensure that service during the off-peak period is distributed equitably between BIPOC and non-BIPOC areas and between low-income and non-low-income areas.

As discussed previously, vehicle headway standards are defined by service type, market area, and day period (Table 5). Metro Transit uses its off-peak vehicle headway standards to assess service availability during the midday between weekday peak periods. Midday vehicle headway standards are summarized in Table 12.

Table 12: Off-Peak Vehicle Headway Standards

Route Type	Market Area I	Market Area II	Market Area III	Market Area IV	Market Area V
Core Local	30'	60'	60'	--	--
Supporting Local	30'	60'	60'	--	--
Suburban Local	--	60'	60'	--	--
Arterial BRT	15'	15'	15'	--	--
Highway BRT	15'	15'	15'	--	--
Light Rail	15'	15'	15'	--	--
Commuter and Express	--	--	--	--	--
Commuter Rail	--	--	--	--	--

Methods

Service availability is evaluated based on the presence of transit service meeting the required headway during the midday off-peak period. Mirroring the approach used to assess vehicle headway compliance, the midday period for this analysis was defined as weekdays between 11 AM and 2 PM.

Calculation of midday vehicle headways is completed using schedules derived from GTFS data from a representative week in fall 2019 and fall 2020. The average combined midday vehicle headway (from one or more routes) is calculated for each stop within Market Areas I, II, and III, and compared to the applicable standard.²⁹ A buffer is created around all stops meeting the relevant combined off-peak vehicle headway standard. The size of the buffer depends on the route types serving the stop: A quarter-mile is used for bus stops served by core local, supporting local, and/or suburban local routes; and a half-mile is used for stations served by arterial BRT, highway BRT, and/or light rail.

²⁹ Calculation of midday vehicle headway for route-stop combinations is not necessary, as standards do not differ between route types within each market area, except for between routes serving bus stops (core local, supporting local, and suburban local) and Metro Transit | Prepared by SRF Consulting

routes serving stations (arterial BRT, highway BRT, and light rail). A standard of 60 minutes is uniformly applied to suburban local route-stop combinations.

The midday service buffer coverage area is then overlaid against census block groups to compare between demographic area types. Finally, the proportion of BIPOC areas meeting the midday vehicle headway standard is compared to the proportion of non-BIPOC areas meeting the standard, and likewise for low-income areas versus non-low-income areas.

Results

The results of these analyses are shown in Table 13 and Table 14. Maps showing the extent of midday service availability are included in Appendix H: Midday Service Availability.

As expected, coverage was highest in Market Area I and lowest in Market Area III (Table 13, Table 14). It was most similar between area types in Market Area II and most varied in Market Area III.

In all cases, in both 2019 and 2020, BIPOC areas had greater midday service coverage than non-BIPOC areas, and low-income areas had greater midday service coverage than non-low-income areas, as indicated by comparison indices greater than 1.00 (Table 13, Table 14).

Therefore, this analysis identifies no disparate impact nor disproportionate burden based on midday service availability.

Table 13: Midday Service Availability Results (2019)

Market Area	BIPOC Designation	Percent of Area Served and Meeting Standards	Income Designation	Percent of Area Served and Meeting Standards
I	BIPOC Areas	95.8%	Low-Income Areas	95.9%
	Non-BIPOC Areas	85.3%	Non-Low-Income Areas	80.4%
	DI Comparison Index	1.12	DB Comparison Index	1.19
II	BIPOC Areas	75.3%	Low-Income Areas	76.4%
	Non-BIPOC Areas	72.4%	Non-Low-Income Areas	71.5%
	DI Comparison Index	1.04	DB Comparison Index	1.07
III	BIPOC Areas	33.5%	Low-Income Areas	37.3%
	Non-BIPOC Areas	23.0%	Non-Low-Income Areas	23.1%
	DI Comparison Index	1.46	DB Comparison Index	1.62
Combined	BIPOC Areas	57.1%	Low-Income Areas	63.9%
	Non-BIPOC Areas	36.5%	Non-Low-Income Areas	34.8%
	DI Comparison Index	1.57	DB Comparison Index	1.84

Table 14: Midday Service Availability Results (2020)

Market Area	BIPOC Designation	Percent of Area Served and Meeting Standards	Income Designation	Percent of Area Served and Meeting Standards
I	BIPOC Areas	94.9%	Low-Income Areas	94.9%
	Non-BIPOC Areas	84.4%	Non-Low-Income Areas	79.8%
	DI Comparison Index	1.13	DB Comparison Index	1.19
II	BIPOC Areas	74.7%	Low-Income Areas	75.6%
	Non-BIPOC Areas	73.1%	Non-Low-Income Areas	72.4%
	DI Comparison Index	1.02	DB Comparison Index	1.04
III	BIPOC Areas	33.1%	Low-Income Areas	35.3%
	Non-BIPOC Areas	21.1%	Non-Low-Income Areas	21.8%
	DI Comparison Index	1.57	DB Comparison Index	1.62
Combined	BIPOC Areas	56.6%	Low-Income Areas	62.6%
	Non-BIPOC Areas	35.2%	Non-Low-Income Areas	34%
	DI Comparison Index	1.61	DB Comparison Index	1.84

Service Availability: Stop Spacing Standards

Stop spacing standards 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 in-vehicle travel time. In general, the average distance people are willing to walk to access transit services is one-quarter mile for local bus service and one-half mile for limited stop bus service and transitway service.

Table 15 shows the recommended stop spacing standards 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 15: Stop Spacing Standards

Route Type	Typical Stop Spacing
Core Local*	1/8 to 1/4 Mile
Supporting Local	1/8 to 1/4 Mile
Suburban Local	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 and Express	Market Specific**
Commuter Rail	5 to 7 miles

*Local routes with limited stop service will have a typical stop spacing of 1/4 to 1/2 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.

Methods

Analysis of stop spacing standards compliance uses stops and schedules derived from Metro Transit's HASTUS database from a representative week in fall 2019 and fall 2020. The HASTUS data include a calculation of the distance between consecutive stops along a route line, which is often defined by the street network. The route line segment between two consecutive stops in the same direction from the same route is defined in this analysis as a route-stop link.

Street networks or other geographic features may not allow for stop spacing precisely within the appropriate stop spacing standard range. Further, Metro Transit must consider site-specific characteristics before placing stops, including consideration of near-side versus far-side stop placement. To account for these real-world situations, the allowable stop spacing ranges are modified by +/-100 feet from the prescribed range for all route types. For example, core local routes have a typical stop spacing standard of 1/8 to 1/4 miles (Table 15), equal to 660 to 1,320 feet; a range of 560 to 1,420 feet is used in this analysis as evidence of meeting the stop spacing standard for stops served by core local routes.

Commuter and express routes are excluded from analysis, as this route type has no numerical stop spacing standards.

Results

Figure 3 below displays the frequency of route-stop links system-wide by stop link length relative to stop spacing standards, by mode, for fall 2020. A route-stop link is the path between two consecutive stops on a single route in one direction, following the route line. System-wide, results reflective of fall 2019 are nearly identical to those from fall 2020.

Of the nearly 10,500 bus route-stop links, 71% met the stop spacing standard in fall 2020; less than 10% were longer than the stop spacing standards, while about 20% were shorter (Figure 3). Stop spacing standards compliance is much lower for light rail and commuter rail route-stop links. Station platform placement for these modes requires many additional considerations (e.g., population and employment density, etc.), and are further informed by the Metropolitan Council's *Regional Transitway Guidelines* and Metro Transit's broader street, design, and service standards.

Figure 3. System-wide Route-Stop Link Lengths Relative to Stop Spacing Standards (2020)

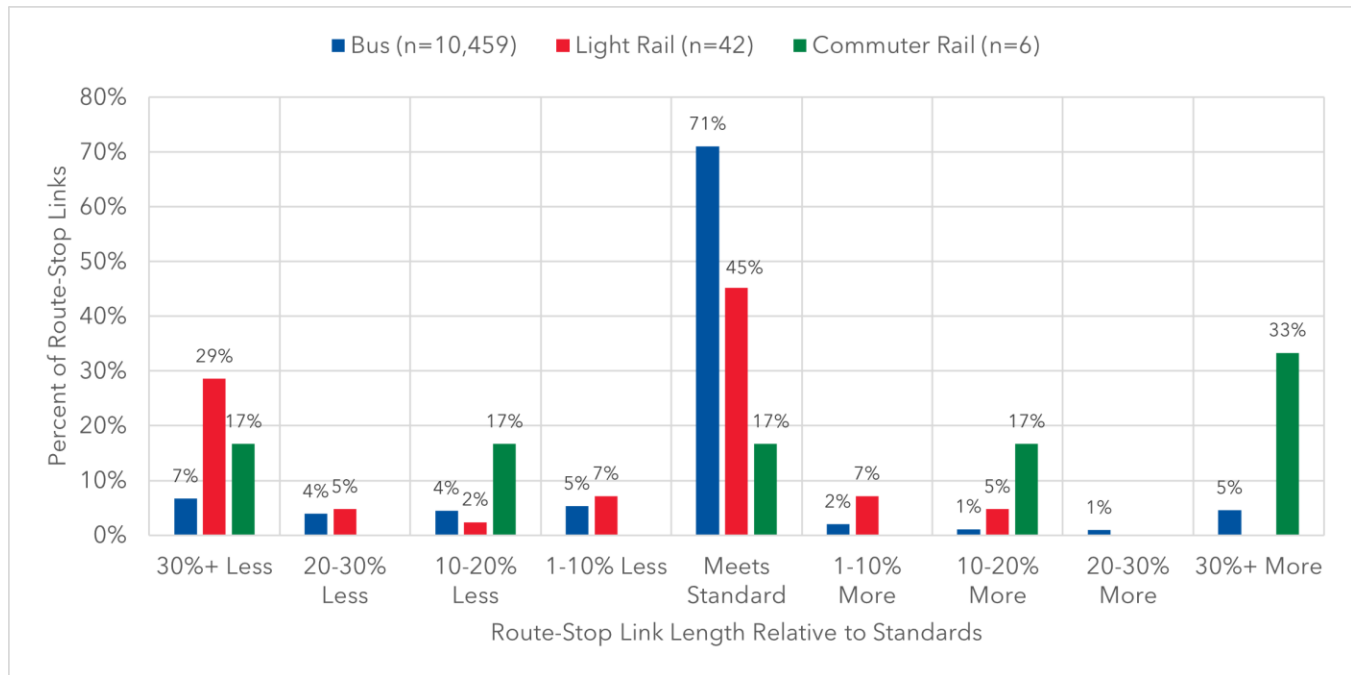


Table 16 further summarizes the results of these analyses for fall 2019 and fall 2020, incorporating route designations.

Table 16. Stop Spacing Standards Results: Route-Stop Links Meeting Standards

Mode	BIPOC Designation	Fall 2019	Fall 2020
Bus	BIPOC Routes	72.7%	72.2%
	Non-BIPOC Routes	65.4%	66.5%
	DI Comparison Index	1.11	1.09
	Low-Income Routes	72.9%	72.0%
	Non-Low-Income Routes	60.4%	60.5%
	DB Comparison Index	1.21	1.19
Light Rail	BIPOC Routes	45.2%	45.2%
	Low-Income Routes	45.2%	45.2%
Commuter Rail	Non-BIPOC Routes	16.7%	16.7%
	Non-Low-Income Routes	16.7%	16.7%

Among bus routes, BIPOC routes had a greater proportion of their route-stop links within the stop spacing standard ranges compared to non-BIPOC routes, with 73% and 65%, respectively, in 2019 (Table 16). Results were nearly identical in 2020. The resulting comparison indices are greater than 1.00, indicating more advantageous results for BIPOC routes. **Therefore, this analysis identifies no disparate impact based on stop spacing.**

Shown in Table 16, low-income bus routes had greater stop spacing compliance (73%) than non-low-income routes (60%) in 2019. Results were nearly identical in 2020. The resulting comparison indices

are greater than 1.00, indicating more advantageous results for low-income bus routes. **Therefore, this analysis identifies no disproportionate burden based on stop spacing.**

Distribution of Amenities Policies

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 lighting and heaters, 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.

Metro Transit has developed policies for the distribution of **customer information, seating, shelter, shelter lighting and heaters, and trash receptacles at the stops it serves with fixed routes.** Summarized in Table 17, these policies differ by stop type, with standard and optional features varying for bus stops, stops at transit centers, and stops (platforms) at light rail, BRT, and commuter rail stations.

Table 17. Customer Amenities at Transit Stops Policies

Amenity	Stop Type		
	METRO (LRT, BRT) & Commuter Rail Stations*	Transit Centers	Bus Stops
Route numbers, unique stop number, instructions on how to access NexTrip real-time information	Standard feature	Standard feature	Standard feature
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
Lighting	Standard feature	Standard feature	Optional feature, prioritized for bus stops with high boardings during dark hours
Heaters	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.

***Based on the Guidelines for Real-Time and Electronic Signs, the criteria for selecting sites for real-time signs include (1) nature of service, (2) ridership, and (3) equity.

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 available online, via mobile application, telephone, or text message. Enhanced information is available at transit centers, stations, and bus stops with 10 or more daily boardings (Table 17).

Sheltered waiting places for Metro Transit customers come in many forms, including an interior waiting space or alcove integrated into a building, a park & 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 private property owners.

Metro Transit predominantly uses ridership when determining where to place shelters and shelter lighting and heaters (Table 17). 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.

Importantly, in addition to these policies for prioritization of optional features, site factors determine if certain amenities can be placed at a stop. Site factors such as available space, slope, and obstructions determine if a shelter can be located at a bus stop. Site factors related to power source and electrical connections affect placement of lighting and heaters within shelters. Additionally, personal security factors are considered when prioritizing lighting.

Methods

This analysis considers the presence of customer amenities at the 11,912 stops served by Metro Transit routes in either fall 2019, fall 2020, or both periods. Each stop is designated as either BIPOC or non-BIPOC and either low-income or non-low-income based on the demographics of those living near the stop relative to service area averages (see *Stop Designations* for additional details).

Per Metro Transit's amenities standards (Table 17), analyses are completed separately for stops at light rail, BRT, and commuter rail stations (these stops are otherwise known as platforms; n=172); stops at one of 25 transit centers (n=85 stops); and all other bus stops (n=11,655 stops).³⁰ Table 18 summarizes the stops considered in this analysis by stop type and by BIPOC and low-income designation.

³⁰ Stops that are light rail or BRT station platforms that are within a transit center (e.g., 46th Street Station, Mall of America, etc.) were subject to the more stringent amenities policies for stations, rather than the less stringent policies for stops at transit centers.

Table 18. Summary of Stops Analyzed

Stop Type	BIPOC Stops	Non-BIPOC Stops	Low-Income Stops	Non-Low-Income Stops	All Stops
LRT, BRT & Commuter Rail Stations	116	56	124	48	172
	67%	33%	72%	28%	100%
Transit Centers	60	25	55	30	85
	71%	29%	65%	35%	100%
Bus Stops	5,199	6,456	5,363	6,292	11,655
	45%	55%	46%	54%	100%
Total	5,375	6,537	5,542	6,370	11,912
	45%	55%	47%	53%	100%

For each amenity type, at each of the stop types, amenity placement rates were calculated and compared between BIPOC stops and non-BIPOC stops, and between low-income stops and non-low-income stops. For example:

- 12.7% of all low-income bus stops have shelter, compared to 3.3% of all non-low-income bus stops (Table 19);
- 88.3% of all BIPOC stops at Transit Centers have a real-time arrival sign, compared to 76.0% of all non-BIPOC stops at Transit Centers (Table 20);
- 100% of low-income stops at stations have a detailed timetable, equal the rate for non-low-income stops at stations (Table 21).

These placement rates are used to calculate a comparison index to determine if there is disparate impact or disproportionate burden in access to amenities.

For amenities with numerical warrants – such as a daily boarding threshold for placement of a shelter – analysis was conducted for warranted stops, unwarranted stops, and overall (regardless of the warrant).

Additionally, the following assumptions and methods were used in the analysis:

- Amenity warrants based on ridership (e.g., shelter) use average weekday daily boarding data from fall 2019, collected from APCs and summarized to the stop level. If the stop was not present in fall 2019, fall 2018 boarding data are used; if boarding data from neither fall 2019 nor fall 2018 are available, that from fall 2020 are used.
- Lighting at a transit stop means electrified or solar-powered lighting installed within a shelter.
- Bus stops with shelter owned by an entity other than Metro Transit and the Metropolitan Council are excluded from analysis of warranted and unwarranted placement of lighting and heaters within shelter. Metro Transit has limited influence over the placement of lighting and heaters within shelters it does not own. As such, 37 of the 896 bus stops with a stand-alone shelter were excluded, leaving 859 shelters that could have been eligible for lighting and heaters, regardless of warrants and site factors.

- FTA *Circular 4702.1B* states that the requirement to establish policies for the distribution of transit amenities, “is not intended to impact funding decisions for transit amenities. Rather, [the policies apply] after a transit provider has decided to fund an amenity.”³¹ Therefore, this analysis considers only amenities that have already been distributed throughout the fixed route system. Specifically, the analysis does not address unplaced amenities that may be warranted based on the policies, except for when considering disparate impact and disproportionate burden.

Results

Table 19, Table 20, and Table 21 summarize the results of the distribution of amenities analyses for bus stops, stops at transit centers, and stops at light rail, BRT, and commuter rail stations, respectively. **The results reflect that all amenity types available at all stop types have been prioritized at stops where BIPOC and low-income residents make up a greater proportion of residents.**

Bus Stops

For all amenity types, regardless of warrants:

- amenity placement rates at BIPOC bus stops were greater than or equal to those at non-BIPOC bus stops, and;
- amenity placement rates at low-income bus stops were greater than or equal to those at non- low-income bus stops.

Placement rates for different amenity types at bus stops and their comparison indices are shown in Table 19. For all amenity types, the resulting comparison indices are greater than or equal to 1.00, indicating equal or greater placement rates at BIPOC stops and low-income stops compared to non- BIPOC stops and non-low-income stops, respectively. **Therefore, this analysis identifies no disparate impact nor disproportionate burden based on the distribution of amenities at bus stops.**

Shelter, lighting, and heaters at bus stops are among the most common amenities requested by Metro Transit customers. As indicated in Table 19, when warranted by ridership:

- Shelters are placed at BIPOC bus stops at a rate 16% greater than non-BIPOC stops (63.5% versus 54.5%)
- Shelters are placed at low-income bus stops at a rate 21% greater than non-low-income stops (63.0% versus 52.1%)
- Heaters within shelter are placed at BIPOC bus stops at a rate 130% greater than at non-BIPOC stops (39.9% versus 17.3%)
- Heaters within shelter are placed at low-income bus stops at a rate 83% greater than at non- low-income stops (36.7% versus 20.0%)

Metro Transit considers adding lighting to shelters at bus stops with high boardings during dark hours. As indicated in Table 19:

- Lighting within shelters is placed at BIPOC bus stops at a rate 12% greater than non-BIPOC stops (63.5% versus 54.5%)
- Lighting within shelters is placed at low-income bus stops at a rate 21% greater than non-non- low-income stops (43.5% versus 35.9%)

Table 19: Customer Amenity Placement Rates at Bus Stops

Amenity	BIPOC Stops	Non-BIPOC Stops	DI Comp. Index	Low-Income Stops	Non-Low-Income Stops	DB Comp. Index
Route Description/Map (n=1,276)	67.3%	63.0%	1.07	67.0%	62.8%	1.07
Warranted (n=1,065)	69.9%	65.5%	1.07	69.1%	66.3%	1.04
Unwarranted (n=211)	57.0%	52.5%	1.09	58.9%	46.8%	1.26
Detailed Timetable within Shelter (n=844)	100.0%	100.0%	1.00	100.0%	100.0%	1.00
Real-Time Arrival Sign (n=77)	1.1%	0.3%	4.07	1.3%	0.1%	8.86
Shelter (n=889)	11.6%	4.4%	2.63	12.7%	3.3%	3.87
Warranted (n=664)	62.7%	54.3%	1.16	62.3%	51.7%	1.21
Unwarranted (n=225)	2.9%	1.5%	1.91	3.1%	1.4%	2.22
Lighting within Shelter (n=360)	43.9%	39.0%	1.13	44.1%	36.3%	1.21
Heaters within Shelter (n=127)	17.8%	8.3%	2.16	16.6%	8.9%	1.86
Warranted (n=82)	39.9%	17.3%	2.30	36.7%	20.0%	1.83
Unwarranted (n=45)	8.0%	5.9%	1.35	7.4%	7.1%	1.04

Transit Centers

The amenities placement results for stops at transit centers are similar to those at standard bus stops. For all amenity types:

- amenity placement rates at BIPOC stops at transit centers were greater than or equal to those at non-BIPOC stops at transit centers, and;
- amenity placement rates at low-income stops at transit centers were greater than or equal to those at non-low-income stops at transit centers.

Placement rates for different amenity types at transit center stops and their comparison indices are shown in Table 20. For all amenity types, the resulting comparison indices are greater than or equal to 1.00, indicating equal or greater placement rates at BIPOC stops and low-income stops compared to non-BIPOC stops and non-low-income stops, respectively. **Therefore, this analysis identifies no disparate impact nor disproportionate burden based on the distribution of amenities at transit center stops.**

Table 20: Customer Amenity Placement Rates at Stops at Transit Centers

Amenity	BIPOC Stops	Non-BIPOC Stops	DI Comp. Index	Low-Income Stops	Non-Low-Income Stops	DB Comp. Index
Route Description/Map (n=85)	100.0%	100.0%	1.00	100.0%	100.0%	1.00
Detailed Timetable (n=85)	100.0%	100.0%	1.00	100.0%	100.0%	1.00
Real-Time Arrival Sign (n=72)	88.3%	76.0%	1.16	87.3%	80.0%	1.09
Seating (n=85)	100.0%	100.0%	1.00	100.0%	100.0%	1.00
Shelter (n=85)	100.0%	100.0%	1.00	100.0%	100.0%	1.00
Lighting within Shelter (n=79)	100.0%	76.0%	1.32	100.0%	80.0%	1.25
Heaters within Shelter (n=79)	100.0%	76.0%	1.32	100.0%	80.0%	1.25
Trash Receptacle (n=85)	100.0%	100.0%	1.00	100.0%	100.0%	1.00

Light Rail, BRT, and Commuter Rail Stations

All standard amenities are present at each of Metro Transit’s light rail, BRT, and commuter rail stations, per customer amenities policies (Table 17). As such, all amenities have placement rates of 100% (Table 21). For all amenity types:

- amenity placement rates at BIPOC stops at stations were equal to those at non-BIPOC stops at stations, and;
- amenity placement rates at low-income bus stops at stations were equal to those at non-low-income stops at stations.

Therefore, this analysis identifies no disparate impact nor disproportionate burden based on the distribution of amenities at light rail, BRT, and commuter rail stations.

Table 21: Customer Amenity Placement Rates at Stops at Light Rail, BRT, and Commuter Rail Stations

Amenity (Number Deployed)	BIPOC Stops	Non-BIPOC Stops	DI Comp. Index	Low-Income Stops	Non-Low-Income Stops	DB Comp. Index
Route Description/Map (n=172)	100.0%	100.0%	1.00	100.0%	100.0%	1.00
Detailed Timetable (n=171)	100.0%	100.0%	1.00	100.0%	100.0%	1.00
Real-Time Arrival Sign (n=172)	100.0%	100.0%	1.00	100.0%	100.0%	1.00
Seating (n=172)	100.0%	100.0%	1.00	100.0%	100.0%	1.00
Shelter (n=171)	100.0%	100.0%	1.00	100.0%	100.0%	1.00
Lighting within Shelter (n=171)	100.0%	100.0%	1.00	100.0%	100.0%	1.00
Heaters within Shelter (n=171)	100.0%	100.0%	1.00	100.0%	100.0%	1.00
Trash Receptacle (n=172)	100.0%	100.0%	1.00	100.0%	100.0%	1.00

One station does not have a detailed timetable, shelter, lighting, or heaters: northbound Xerxes & 56th arterial BRT station in Brooklyn Center, served by the METRO C Line. This station is the last northbound station before the end of the C Line, where most activity is from passengers getting off the bus and few passengers board the bus. Metro Transit’s policies for customer amenities at arterial

BRT stations explicitly state that certain amenities are not expected in situations like this. Thus, this station is excluded from analysis of detailed timetables, shelters, lighting, and heaters.

Vehicle Assignment Policies

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 for fixed-route service, 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 accessible and 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.

Hybrid Buses

Through agreement with the City of Minneapolis, all routes operating regular schedules 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. During the response to the COVID-19 pandemic, articulated buses were assigned to core local bus routes to manage capacity under the CDC and local guidelines for public health.

Small Buses

Buses that are 30 feet or smaller (e.g., “cutaway” buses) are sometimes used by contractors to provide service on lower-ridership routes.³²

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.

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. 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.

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: Transit agencies must maintain and make available spare vehicles beyond those required to operate service at the maximum level to enable regular vehicle maintenance activities and account for unexpected repairs. A spare factor (or spare ratio) is a common transit vehicle maintenance performance measure to judge the effectiveness of fleet management while ensuring enough vehicles are available to meet scheduled service levels. Spare factor is defined as the number of spare vehicles divided by the vehicles required for maximum service.
3. Vehicle type: 40-foot or articulated, based on ridership as assigned by Service Development department
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.

³² Where vehicle age is a proxy for condition, analysis is completed separately for different vehicle subtypes within the category (e.g., 30-foot buses, cutaway buses).

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

Contracted 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 service levels are adjusted, routes are added to or eliminated from a contracted service portfolio, vehicle issues arise, etc. Buses are replaced as they reach the end of their useful life per the *Regional Vehicle Fleet Policy*, which applies to all Council-owned buses in public transit service in the region.

The contractor can assign any bus to any route if 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 BIPOC and/or low-income routes should be approximately equal to the average age of vehicles assigned to non-BIPOC and/or non-low-income routes.

Methods

This evaluation uses vehicle age as a proxy for condition, reported two ways:

- average age of vehicles assigned to a route; and
- difference between the average age of vehicles assigned to a route and the average age of the vehicle fleet eligible for a route, where the vehicle fleet represents the universe of available vehicles that could have been assigned to a specific trip on a specific route.

Average age of vehicles assigned by route is calculated by averaging the age of vehicles that operated all trips completed for that route.

To generate a report of the average age of vehicles assigned and available (fleet age) by route, it is first necessary to determine what vehicle type was assigned and could have been assigned to each trip during the fall of 2019. This information is generated primarily using automatic vehicle locator (AVL) data. If AVL data are not available for a trip, secondary sources are used, including farebox data and dispatcher-recorded assignments. In cases where more than one vehicle was used to operate a trip, the age of the first vehicle assigned is used for analysis.³³

Data from fall 2019 are used in this analysis. Fall 2020 data are not considered given the necessary changes in vehicle assignment considering COVID-19. At that time, Metro Transit was assigning

³³ 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.

articulated buses to trips and routes that would otherwise be assigned a standard low-floor, 40-foot bus to ensure social distancing slow spread of the virus.

Vehicles operated on the METRO Blue and Green light rail lines, and Northstar commuter rail are excluded from this analysis, given their limited fleets, constraints on vehicle assignment, and route designations.³⁴ Both of the light rail lines are designated as BIPOC and low-income routes, and Northstar is designated as non-BIPOC and non-low-income.

Results

Table 22 summarizes average vehicle age assigned, available (fleet), and the difference between the two, by route designation for trips operated in fall 2019. A route-by-route summary of vehicle assignment results is provided in Appendix I: Vehicle Assignment.

Among bus routes, BIPOC route trips were assigned newer vehicles than non-BIPOC route trips, at

6.72 years and **7.01** years, on average, respectively (Table 22). Further, BIPOC route trips had greater difference between the average assigned vehicle age and the average available vehicle age than non- BIPOC route trips (0.53 years newer versus 0.25 years newer). For both measures – assigned age and difference in assigned age from available age – comparison indices are greater than 1.00, indicating more advantageous results for BIPOC routes. **Therefore, this analysis identifies no disparate impact based on vehicle assignment.**

Table 22. Vehicle Assignment Policy Results, Measured by Average Vehicle Age (Years)

Mode	Route Designation	Assigned	Available	Difference
Bus	BIPOC Route Trips	6.72	7.25	-0.53
	Non-BIPOC Route Trips	7.01	7.26	-0.25
	DI Comparison Index	1.04	--	2.12
Low-Income	Low-Income Route Trips	6.62	7.17	-0.55
	Non-Low-Income Route Trips	7.64	7.64	0
	DB Comparison Index	1.15	--	>1.00

Low-income route trips were assigned vehicles approximately one year newer than those assigned to non-low-income route trips, on average (6.62 years versus 7.64 years). The average trip operated on a non-low-income route was assigned a vehicle that was about equal to the average age of the available vehicles that could have operated the trip. Alternatively, low-income route trips were assigned vehicles 0.55 years newer than the average age of the available vehicles that could have operated the trip. Shown in Table 22, both measures of vehicle assignment resulted in comparison indices greater than 1.00, indicating more advantageous results for low-income routes. **Therefore, this analysis identifies no disproportionate burden based on vehicle assignment.**

³⁴ Metro Transit’s METRO Blue Line fleet consists of light rail vehicles (LRVs) manufactured from 2003 to 2007. Metro Transit’s METRO Green Line fleet consists of LRVs manufactured from 2012 to 2017. However, in some cases, year 2012 LRVs are assigned to Blue Line service when they are not need on the Green Line. Metro Transit’s commuter rail fleet consists of one locomotive manufactured in 2008, six locomotives manufactured in and 2009, and 18 passenger coach cars manufactured in 2009.

Summary of Results

Table 23 lists the disparate impact and disproportionate burden comparison indices results of all analyses of Metro Transit’s Title VI standards and policies, in either fall 2019, fall 2020, or both periods.

Most comparison indices in Table 23 are greater than or equal to 1.00, indicating better results for BIPOC and low-income residents and riders compared to non-BIPOC and non-low-income residents and riders, respectively. All comparison indices are above the 0.80 minimum threshold for avoiding disparate impact and disproportionate burden. **Therefore, this analysis identifies no disparate impact nor disproportionate burden based on Metro Transit’s Title VI standards and policies.**

Table 23. Summary of Analysis Results

Standard/Policy	Measure	Fall 2019		Fall 2020	
		DI Comp. Index	DB Comp. Index	DI Comp. Index	DB Comp. Index
Vehicle Load	Trips Overloaded	1.63	2.46	--	--
	Trips Consistently Overloaded	3.73	4.41	--	--
Vehicle Headway	Peak	0.92	1.07	1.20	1.75
	Off-Peak	0.99	1.03	0.99	1.05
	Weekend	1.07	1.52	1.07	1.56
	Total	1.04	1.30	1.13	1.62
On-Time Performance	Timepoint Obs. On Time	1.05	1.02	--	--
Route Spacing	Core Local – Market Area I	1.03	1.05	1.00	1.03
	Supporting Local – Market Area I	1.11	1.23	1.08	1.11
	Core, Supporting, Suburban Local – Market Area II	0.98	0.98	0.98	0.98
Midday Service	Market Area I	1.12	1.19	1.13	1.19
	Market Area II	1.04	1.07	1.02	1.04
	Market Area III	1.46	1.62	1.57	1.62
Stop Spacing	Route-Stop Links Meeting Standards	1.11	1.21	1.09	1.19
Distribution of Amenities	Route Description/Map	--	--	1.07	1.07
At Bus Stops	Warranted	--	--	1.07	1.04
	Unwarranted	--	--	1.09	1.26
	Detailed Timetable	--	--	1.00	1.00
	Real-Time Arrival Sign	--	--	4.07	8.86
	Shelter	--	--	2.63	3.87
	Warranted	--	--	1.16	1.21
	Unwarranted	--	--	1.91	2.22
	Lighting within Shelter	--	--	1.13	1.21
	Heaters within Shelter	--	--	2.16	1.86
	Warranted	--	--	2.30	1.83
	Unwarranted	--	--	1.35	1.04

Standard/Policy	Measure	Fall 2019		Fall 2020	
		DI Comp. Index	DB Comp. Index	DI Comp. Index	DB Comp. Index
Distribution of Amenities At Transit Centers	Route Description/Map	--	--	1.00	1.00
	Detailed Timetable	--	--	1.00	1.00
	Real-Time Arrival Sign	--	--	1.16	1.09
	Seating			1.00	1.00
	Shelter	--	--	1.00	1.00
	Lighting within Shelter	--	--	1.32	1.25
	Heaters within Shelter	--	--	1.32	1.25
	Trash Receptacle	--	--	1.00	1.00
Distribution of Amenities At Stations	Route Description/Map	--	--	1.00	1.00
	Detailed Timetable	--	--	1.00	1.00
	Real-Time Arrival Sign	--	--	1.00	1.00
	Seating	--	--	1.00	1.00
	Shelter	--	--	1.00	1.00
	Lighting within Shelter	--	--	1.00	1.00
	Heaters within Shelter	--	--	1.00	1.00
	Trash Receptacle	--	--	1.00	1.00
Vehicle Assignment	Age of Vehicles Assigned	1.04	1.15	--	--
	Age of Vehicles Assigned Relative to Available	2.12	>1.00	--	--

CHAPTER 5: CONCLUSIONS

This report satisfies the FTA Title VI requirement to monitor transit system performance relative to system-wide service standards and policies at least once every three years. This effort replaces the previous service monitoring study, completed in fall 2018.

This analysis identifies no disparate impact on BIPOC populations nor disproportionate burden on low-income populations based on Metro Transit’s Title VI standards and policies (Table 24).

Most measures of compliance with Metro Transit’s service standards and policies showed that BIPOC and low-income populations received better outcomes compared to non-BIPOC and non-low-income populations. The few exceptions to this are instances where compliance rates for BIPOC or low-income populations were within one to eight percent of those for non-BIPOC or non-low-income populations – well within the allowable difference of 20 percent established in Metro Transit’s disparate impact and disproportionate burden thresholds.

Table 24: Disparate Impact and Disproportionate Burden Results Summary

Standard/Policy	Disparate Impact on BIPOC Population	Disproportionate Burden on Low-Income Population
Vehicle Load	No	No
Vehicle Headway	No	No
On-Time Performance	No	No
Service Availability	No	No
Route Spacing	No	No
Midday Service	No	No
Stop Spacing	No	No
Distribution of Amenities	No	No
At Bus Stops	No	No
At Transit Centers	No	No
At Stations	No	No
Vehicle Assignment	No	No

Title VI is one piece of the broader strategic framework that Metro Transit uses to meaningfully advance equity in the region. Broader equity work, including additional quantitative analysis, is ongoing and continuous at Metro Transit. Equity is not achieved through one sole program, project, policy, or procedure, but in the integration of equity work throughout the agency.

Despite the lack of actionable Title VI findings from this study, Metro Transit continues to evaluate its service and improve equity of inputs and outcomes and will continue to evaluate service for disparate impact and disproportionate burden outside of triennial FTA Title VI service monitoring.

APPENDIX A: ROUTE TYPES

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.

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

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. Provider-specific variations on suburban local bus include community routes and feeder routes.

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 & ride facilities and dropping them off at a major destination.

Arterial Bus Rapid Transit

Arterial 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.

Highway Bus Rapid Transit

Highway 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.

Light Rail

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.

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.

APPENDIX B: ROUTE DESIGNATIONS

Table 25: Service Monitoring Routes by Type and Designations

Route	Route Type	Race/Ethnicity Designation	Income Designation
2	Core Local	BIPOC	Low-Income
3	Core Local	BIPOC	Low-Income
4	Core Local	Non-BIPOC	Low-Income
5	Core Local	BIPOC	Low-Income
6	Core Local	Non-BIPOC	Low-Income
7	Core Local	BIPOC	Low-Income
9	Core Local	BIPOC	Low-Income
10	Core Local	BIPOC	Low-Income
11	Core Local	BIPOC	Low-Income
12	Core Local	Non-BIPOC	Low-Income
14	Core Local	BIPOC	Low-Income
16	Supporting Local	BIPOC	Low-Income
17	Core Local	Non-BIPOC	Low-Income
18	Core Local	BIPOC	Low-Income
19	Core Local	BIPOC	Low-Income
21	Core Local	BIPOC	Low-Income
22	Core Local	BIPOC	Low-Income
23	Supporting Local	Non-BIPOC	Non-Low-Income
25	Core Local	Non-BIPOC	Non-Low-Income
27	Supporting Local	BIPOC	Low-Income
30	Supporting Local	BIPOC	Low-Income
32	Supporting Local	BIPOC	Low-Income
39	Supporting Local	Non-BIPOC	Non-Low-Income
46	Supporting Local	Non-BIPOC	Non-Low-Income
53	Core Local	BIPOC	Low-Income
54	Core Local	BIPOC	Low-Income
59	Core Local	BIPOC	Low-Income
61	Core Local	BIPOC	Low-Income
62	Core Local	BIPOC	Low-Income
63	Core Local	BIPOC	Low-Income
64	Core Local	BIPOC	Low-Income
65	Supporting Local	BIPOC	Low-Income
67	Core Local	BIPOC	Low-Income
68	Core Local	BIPOC	Low-Income
70	Core Local	BIPOC	Low-Income
71	Core Local	BIPOC	Low-Income
74	Core Local	BIPOC	Low-Income
75	Core Local	BIPOC	Low-Income
80	Supporting Local	BIPOC	Low-Income
83	Supporting Local	BIPOC	Low-Income
84	Supporting Local	Non-BIPOC	Low-Income
87	Supporting Local	Non-BIPOC	Low-Income
94	Commuter and Express	BIPOC	Low-Income
111	Commuter and Express	BIPOC	Non-Low-Income

Route	Route Type	Race/Ethnicity Designation	Income Designation
113	Commuter and Express	Non-BIPOC	Low-Income
114	Commuter and Express	Non-BIPOC	Low-Income
115	Commuter and Express	Non-BIPOC	Low-Income
118	Commuter and Express	Non-BIPOC	Low-Income
129	Supporting Local	BIPOC	Low-Income
133	Commuter and Express	Non-BIPOC	Non-Low-Income
134	Commuter and Express	Non-BIPOC	Non-Low-Income
135	Commuter and Express	Non-BIPOC	Non-Low-Income
141	Core Local	Non-BIPOC	Non-Low-Income
146	Commuter and Express	Non-BIPOC	Non-Low-Income
156	Commuter and Express	Non-BIPOC	Non-Low-Income
219	Suburban Local	BIPOC	Low-Income
223	Suburban Local	BIPOC	Low-Income
225	Suburban Local	Non-BIPOC	Non-Low-Income
227	Suburban Local	BIPOC	Low-Income
250	Commuter and Express	Non-BIPOC	Non-Low-Income
252	Commuter and Express	Non-BIPOC	Non-Low-Income
261	Commuter and Express	Non-BIPOC	Non-Low-Income
262	Core Local	Non-BIPOC	Non-Low-Income
263	Commuter and Express	BIPOC	Non-Low-Income
264	Commuter and Express	BIPOC	Non-Low-Income
265	Commuter and Express	Non-BIPOC	Non-Low-Income
270	Commuter and Express	BIPOC	Non-Low-Income
272	Commuter and Express	Non-BIPOC	Non-Low-Income
275	Commuter and Express	Non-BIPOC	Non-Low-Income
288	Commuter and Express	Non-BIPOC	Non-Low-Income
294	Commuter and Express	Non-BIPOC	Non-Low-Income
350	Commuter and Express	BIPOC	Non-Low-Income
351	Commuter and Express	BIPOC	Non-Low-Income
353	Commuter and Express	Non-BIPOC	Non-Low-Income
355	Commuter and Express	Non-BIPOC	Non-Low-Income
361	Commuter and Express	Non-BIPOC	Non-Low-Income
364	Commuter and Express	Non-BIPOC	Non-Low-Income
365	Commuter and Express	Non-BIPOC	Non-Low-Income
375	Commuter and Express	Non-BIPOC	Non-Low-Income
415	Suburban Local	BIPOC	Low-Income
417	Suburban Local	Non-BIPOC	Non-Low-Income
452	Commuter and Express	Non-BIPOC	Non-Low-Income
467	Commuter and Express	Non-BIPOC	Non-Low-Income
515	Suburban Local	BIPOC	Low-Income
535	Commuter and Express	BIPOC	Low-Income
537	Suburban Local	Non-BIPOC	Low-Income
538	Suburban Local	BIPOC	Low-Income
539	Suburban Local	BIPOC	Low-Income
540	Suburban Local	BIPOC	Low-Income
542	Suburban Local	BIPOC	Low-Income
552	Commuter and Express	BIPOC	Non-Low-Income
553	Commuter and Express	BIPOC	Non-Low-Income
554	Commuter and Express	BIPOC	Non-Low-Income

Route	Route Type	Race/Ethnicity Designation	Income Designation
558	Commuter and Express	BIPOC	Non-Low-Income
578	Commuter and Express	BIPOC	Non-Low-Income
579	Commuter and Express	Non-BIPOC	Non-Low-Income
587	Commuter and Express	Non-BIPOC	Non-Low-Income
588	Commuter and Express	BIPOC	Low-Income
589	Commuter and Express	Non-BIPOC	Non-Low-Income
597	Commuter and Express	Non-BIPOC	Non-Low-Income
604	Suburban Local	Non-BIPOC	Non-Low-Income
612	Suburban Local	BIPOC	Low-Income
615	Suburban Local	BIPOC	Low-Income
643	Commuter and Express	Non-BIPOC	Non-Low-Income
645	Suburban Local	Non-BIPOC	Non-Low-Income
652	Commuter and Express	Non-BIPOC	Non-Low-Income
663	Commuter and Express	Non-BIPOC	Non-Low-Income
664	Commuter and Express	Non-BIPOC	Non-Low-Income
667	Commuter and Express	Non-BIPOC	Non-Low-Income
668	Commuter and Express	BIPOC	Non-Low-Income
670	Commuter and Express	BIPOC	Low-Income
671	Commuter and Express	Non-BIPOC	Non-Low-Income
672	Commuter and Express	Non-BIPOC	Non-Low-Income
673	Commuter and Express	Non-BIPOC	Non-Low-Income
674	Commuter and Express	Non-BIPOC	Non-Low-Income
677	Commuter and Express	Non-BIPOC	Non-Low-Income
679	Commuter and Express	Non-BIPOC	Non-Low-Income
705	Suburban Local	BIPOC	Low-Income
716	Suburban Local	BIPOC	Low-Income
717	Suburban Local	BIPOC	Low-Income
721	Suburban Local	BIPOC	Low-Income
722	Suburban Local	BIPOC	Low-Income
723	Suburban Local	BIPOC	Low-Income
724	Suburban Local	BIPOC	Low-Income
755	Commuter and Express	BIPOC	Low-Income
756	Commuter and Express	BIPOC	Non-Low-Income
758	Commuter and Express	Non-BIPOC	Non-Low-Income
760	Commuter and Express	BIPOC	Low-Income
761	Commuter and Express	BIPOC	Low-Income
762	Commuter and Express	BIPOC	Non-Low-Income
763	Commuter and Express	BIPOC	Non-Low-Income
764	Commuter and Express	BIPOC	Non-Low-Income
765	Commuter and Express	BIPOC	Non-Low-Income
766	Commuter and Express	BIPOC	Non-Low-Income
767	Commuter and Express	BIPOC	Non-Low-Income
768	Commuter and Express	BIPOC	Non-Low-Income
801	Suburban Local	BIPOC	Low-Income
805	Suburban Local	Non-BIPOC	Low-Income
824	Core Local	BIPOC	Non-Low-Income
825	Core Local	Non-BIPOC	Non-Low-Income
831	Suburban Local	Non-BIPOC	Low-Income
850	Commuter and Express	Non-BIPOC	Non-Low-Income

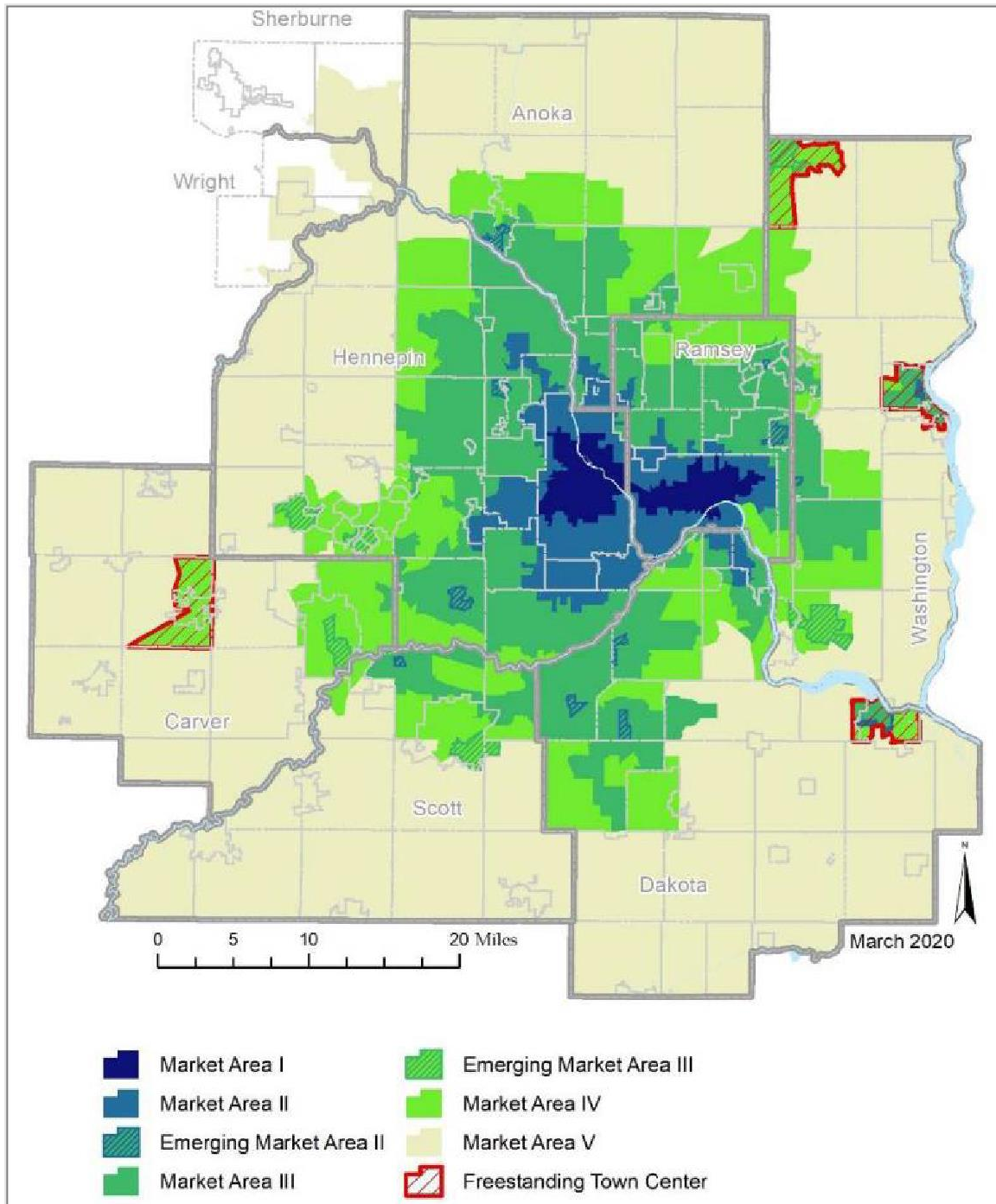
Route	Route Type	Race/Ethnicity Designation	Income Designation
852	Commuter and Express	Non-BIPOC	Low-Income
854	Commuter and Express	Non-BIPOC	Non-Low-Income
860	Commuter and Express	Non-BIPOC	Non-Low-Income
865	Commuter and Express	Non-BIPOC	Non-Low-Income
Northstar (888)	Commuter Rail	Non-BIPOC	Non-Low-Income
METRO Blue Line (901)	Light Rail	BIPOC	Low-Income
METRO Green Line (902)	Light Rail	BIPOC	Low-Income
METRO Red Line (903)	Highway BRT	Non-BIPOC	Non-Low-Income
METRO A Line (921)	Arterial BRT	Non-BIPOC	Low-Income
METRO C Line (923)	Arterial BRT	BIPOC	Low-Income

Table 26. Summary of Route Designations by Route Type

Route Type	Number of Routes	BIPOC	Non-BIPOC	Low-Income	Non-Low-Income
Core Local	34	76%	24%	85%	15%
Supporting Local	13	62%	38%	77%	23%
Suburban Local	26	73%	27%	85%	15%
Commuter and Express	73	37%	63%	16%	84%
Arterial BRT	2	50%	50%	100%	0%
Highway BRT	1	0%	100%	0%	100%
Light Rail	2	100%	0%	100%	0%
Commuter Rail	1	0%	100%	0%	100%
All Routes	152	55%	45%	51%	49%

APPENDIX C: TRANSIT MARKET AREAS

Figure 4. Transit Market Areas in the Region



APPENDIX D: ROUTE DESIGNATION METHODOLOGY

For the purposes of this analysis, all routes are designated as either BIPOC or non-BIPOC routes and either low-income or non-low-income routes. Doing so enables comparison of service outcomes and service standard and policy compliance rates between BIPOC and non-BIPOC routes and between low-income and non-low-income routes, with which determination of disparate impact and disproportionate burden can be made. Table 25 in Appendix B: Route Designations lists of all 152 routes analyzed in this study alongside their designations.

FTA provides guidance on how routes are to be designated. Page I-4 of FTA *Circular 4702.1B* defines a BIPOC (BIPOC) 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 BIPOC population exceeds the percentage BIPOC population in the 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 [and adjust route designations accordingly].

The same criteria apply to the definition of low-income routes.

FTA provides additional guidance on page IV-9 of FTA *Circular 4702.1B*:

Transit providers may supplement [service area data] with ridership data and adjust route designations accordingly. For example, a commuter bus that picks up passengers in generally non-BIPOC areas and then travels through predominantly BIPOC neighborhoods but does not pick up passengers who live closer to downtown might be more appropriately classified as a non-BIPOC route, even if one-third of the route mileage is located in predominantly BIPOC census blocks or block groups. On the other hand, a light rail line may carry predominantly BIPOC passengers to an area where employment centers and other activities are located, but the BIPOC population in the surrounding Census blocks or block groups does not meet or exceed the area average. This route may be more appropriately classified as a BIPOC transit route. Transit providers should ensure they have adequate ridership data before making these determinations, and include that data in their analyses.

In keeping with this guidance, Metro Transit assigns route designations for each of its fixed routes for service monitoring purposes using the process described below. All routes that operated in either fall 2019 or fall 2020 are considered.

- **Step 1: Calculate area around stops and stations served by the route.** Separately for each route pattern, create a 100-foot buffer around the route line; doing so accounts for route lines located on the border between census block groups. Remove portions of the route line buffer area that are more than 0.25 miles from bus stops (or 0.50 miles from stations) served by the route, essentially removing non-stop route segments. Aggregate the route pattern-level data to the route level by calculating a weighted average, using the number of weekly scheduled trips from each pattern. This minimizes the influence of service areas generated from infrequent route patterns in the route's final service area calculation and subsequent

designation.

If at least one-third of the route line buffer area (the area near stops/stations) is located in census block groups where the percentage BIPOC population exceeds the percentage BIPOC population in the Metro Transit service area (i.e., 31.3%), then the route is designated as BIPOC; otherwise, the route is designated as non-BIPOC. This same process applies for designating low-income and non-low-income routes.

As described in previous sections, this study uses U.S. Census Bureau 2015-2019 American Community Survey 5-year estimates at the block group level to determine service area averages for percent BIPOC residents and percent low-income residents. The most recent route geometry and stop assignment schedule data of the two periods considered in this study are used to designate routes; a route that operated in both fall 2019 and fall 2020 is assessed using the latter schedule, while a route that operated in fall 2019 but was suspended in fall 2020 is assessed using the former schedule.

- **Step 2: Incorporate park & ride user home origins.** Additional consideration is given to commuter and express bus, highway BRT, light rail, and commuter rail routes serving one or more park & rides. The areas immediately surrounding park & ride facilities are not necessarily representative of the demographics of the users of that facility. To account for this, the designation of commuter and express bus, highway BRT, light rail, and commuter rail routes serving park & rides incorporates information about where park & ride users live. Metro Transit collects biennially license plate data from vehicles parked at park & ride facilities throughout the region, most recently in 2018. These data are used to determine where vehicles are registered to see a park & ride's user origins.

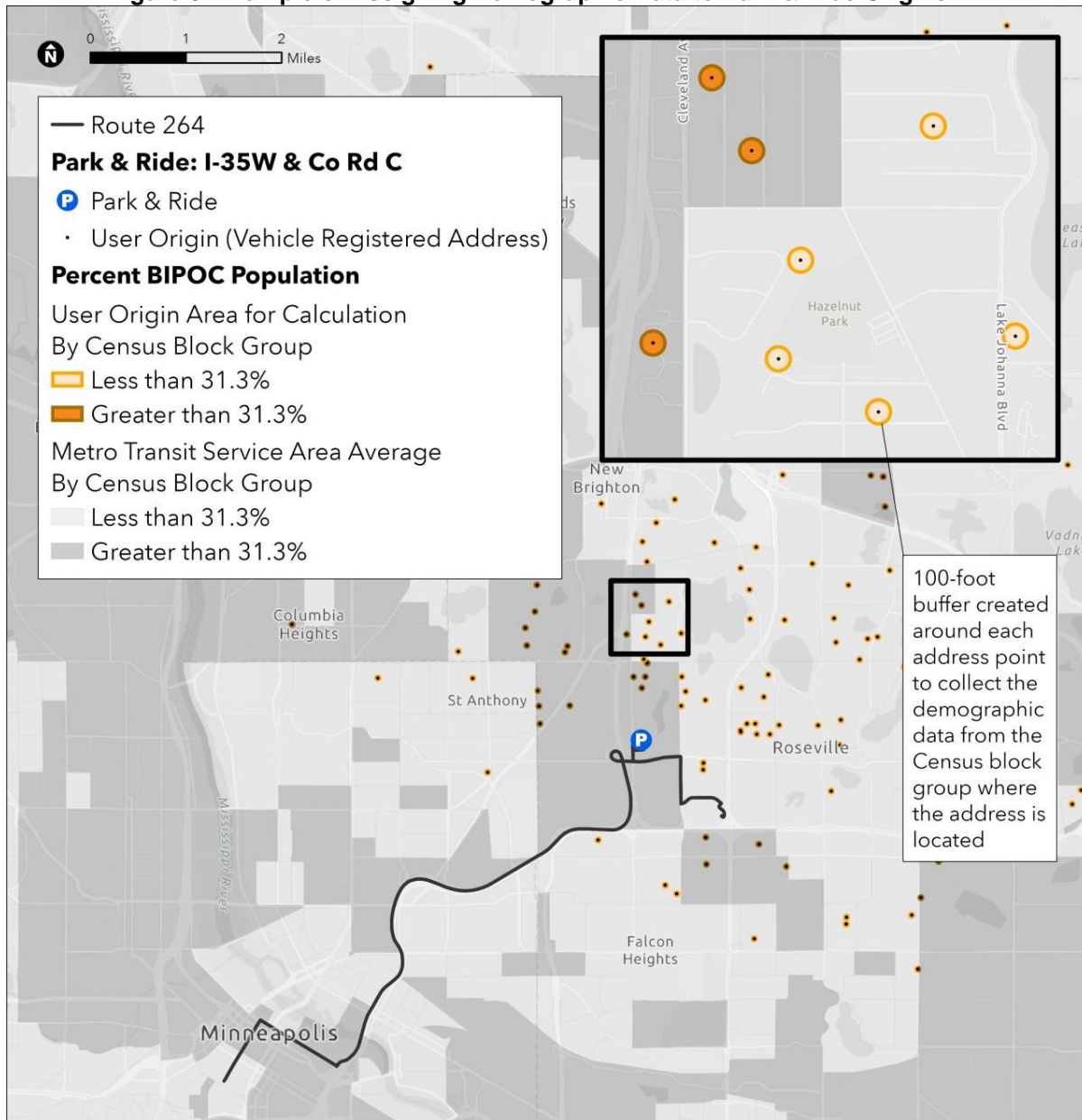
Separately for each park & ride, create a 100-foot buffer around all user origin points from the 2018 license plate survey that are associated with that park & ride. Figure 5 provides an example of this applied to the I-35W & Co Rd C park & ride, served by commuter and express Route 264. Calculate the area (e.g., square meters) of these home location buffers for each park & ride, noting the total area and the area located in census block groups where the percentage BIPOC population exceeds the percentage BIPOC population in the service area (i.e., 31.3%).

For each of the applicable routes (i.e., commuter and express bus, highway BRT, LRT, and commuter rail routes serving one or more park & ride), determine which of the route's patterns serve which park & rides. For each route pattern, sum the park & ride user origin service area data from the one or more park & ride facilities it serves. Aggregate the route pattern-level data to the route level by calculating a weighted average, using the number of weekly scheduled trips from each pattern. Using this approach, park & ride user service areas generated from infrequent route patterns are minimized in the route's final service area calculation and subsequent designation.

Add the route-level park & ride user home location service area data to the route-level service area data calculated based on the route line buffer near stops/stations (from Step 1). If at least one-third of the total buffer area is located in census block groups where the percentage

BIPOC population exceeds the percentage BIPOC population in the service area (i.e., 31.3%), then the route is designated as BIPOC; otherwise, the route is designated as non- BIPOC. This same process applies for designating low-income and non-low-income routes.

Figure 5. Example of Assigning Demographic Data to Park & Ride Origins



- Step 3: Compare preliminary route designations against route-specific ridership data.** Each route is assigned preliminary route designations following Step 1 or Step 2, where applicable. However, these may not necessarily reflect the known ridership characteristics of the route. Review preliminary route designations against route-specific demographic data (i.e., percent BIPOC riders and percent low-income riders) collected from the latest on-board survey and adjust route designations where results differ notably; document justification for the change. For example, if a route was preliminarily designated as non-BIPOC based on its service area, but ridership data suggest that the majority of riders are BIPOC, adjust the route designation

to BIPOC. Take care to note any known sample size cautions and any significant changes to the route since the on-board survey was conducted.

The Metropolitan Council's 2016 Travel Behavior Inventory (TBI) On-Board Survey, the most recent available, was used in this study to finalize route designations using the approach described above. Following a review of the TBI data, 14 routes had their BIPOC/non-BIPOC designation changed, and 37 routes had their low-income/non-low-income designation changed; these routes and the justification for the changes are documented in Table 27 and Table 28, respectively.

Table 27: Routes with Race/Ethnicity Designation Modified Based on Ridership

Route	Route Type	Percent of Area Served Located in Census Block Groups Where the Percentage BIPOC Population Exceeds the Percentage BIPOC Population in the Service Area	Percent BIPOC Riders from On-Board Survey (Avg.=46.3%)	Notes on Modified Designation
39	Supporting Local	96.1%	4.0%	Changed from BIPOC to non-BIPOC given percent BIPOC riders from survey; and route operates in a largely commercial area with limited stops in residential areas
141	Core Local	40.6%	18.0%	Changed from BIPOC to non-BIPOC given percent BIPOC riders from on-board survey
227	Suburban Local	0.0%	60.0%	Changed from non-BIPOC to BIPOC given percent BIPOC riders from on-board survey
272	Commuter and Express	36.9%	9.0%	Changed from BIPOC to non-BIPOC given percent BIPOC riders from on-board survey
361	Commuter and Express	35.5%	17.0%	Changed from BIPOC to non-BIPOC given percent BIPOC riders from on-board survey
365	Commuter and Express	36.0%	15.0%	Changed from BIPOC to non-BIPOC given percent BIPOC riders from on-board survey
415	Suburban Local	17.0%	100.0%	Changed from non-BIPOC to BIPOC given percent BIPOC riders from on-board survey
452	Commuter and Express	48.4%	18.0%	Changed from BIPOC to non-BIPOC given percent BIPOC riders from on-board survey
558	Commuter and Express	23.4%	50.0%	Changed from non-BIPOC to BIPOC given percent BIPOC riders from on-board survey
588	Commuter and Express	18.4%	54.0%	Changed from non-BIPOC to BIPOC given percent BIPOC riders from on-board survey
615	Suburban Local	33.1%	55.0%	Changed from non-BIPOC to BIPOC given percent BIPOC riders from on-board survey
664	Commuter and Express	50.0%	14.0%	Changed from BIPOC to non-BIPOC given percent BIPOC riders from on-board survey
670	Commuter and Express	11.7%	52.0%	Changed from non-BIPOC to BIPOC given percent BIPOC riders from on-board survey
854	Commuter and Express	39.5%	14.0%	Changed from BIPOC to non-BIPOC given percent BIPOC riders from on-board survey

Table 28: Routes with Income Designation Modified Based on Ridership

Route	Route Type	Percent of Area Served Located in Census Block Groups Where the Percentage Low-Income Population Exceeds the Percentage Low-Income Population in the Service Area	Percent Low-Income Riders from On-Board Survey (Avg.=39.9%)	Notes on Modified Designation
6	Core Local	28.9%	39.0%	Changed from non-Low-Income to Low-Income given percent low-income riders from on-board survey; and percent of area served by the route located in census block groups where the percentage low-income population exceeds the percentage low-income population in the service area (28.9%) is close to the one-third (33.3%) threshold
39	Supporting Local	100.0%	0.0%	Changed from Low-Income to non-Low-Income given percent low-income riders from on-board survey; and route operates in a largely commercial area with limited stops in residential areas
111	Commuter and Express	49.7%	0.0%	Changed from Low-Income to non-Low-Income given percent low-income riders from on-board survey
134	Commuter and Express	57.7%	7.0%	Changed from Low-Income to non-Low-Income given percent low-income riders from on-board survey
135	Commuter and Express	50.5%	0.0%	Changed from Low-Income to non-Low-Income given percent low-income riders from on-board survey
141	Core Local	54.3%	24.0%	Changed from Low-Income to non-Low-Income given percent low-income riders from on-board survey
156	Commuter and Express	34.1%	1.0%	Changed from Low-Income to non-Low-Income given percent low-income riders from on-board survey
219	Suburban Local	31.7%	38.0%	Changed from non-Low-Income to Low-Income given percent low-income riders from on-board survey; and percent of area served by the route located in census block groups where the percentage low-income population exceeds the percentage low-income population in the service area (31.7%) is close to the one-third (33.3%) threshold
227	Suburban Local	24.4%	54.0%	Changed from non-Low-Income to Low-Income given percent low-income riders from on-board survey
261	Commuter and Express	34.1%	1.0%	Changed from Low-Income to non-Low-Income given percent low-income riders from on-board survey
263	Commuter and Express	52.8%	2.0%	Changed from Low-Income to non-Low-Income given percent low-income riders from on-board survey
270	Commuter and Express	37.9%	3.0%	Changed from Low-Income to non-Low-Income given percent low-income riders from on-board survey
272	Commuter and Express	38.5%	0.0%	Changed from Low-Income to non-Low-Income given percent low-income riders from on-board survey
350	Commuter and Express	50.9%	9.0%	Changed from Low-Income to non-Low-Income given percent low-income riders from on-board survey

Route	Route Type	Percent of Area Served Located in Census Block Groups Where the Percentage Low-Income Population Exceeds the Percentage Low-Income Population in the Service Area	Percent Low-Income Riders from On-Board Survey (Avg.=39.9%)	Notes on Modified Designation
415	Suburban Local	17.0%	100.0%	Changed from non-Low-Income to Low-Income given percent low-income riders from on-board survey
452	Commuter and Express	39.0%	7.0%	Changed from Low-Income to non-Low-Income given percent low-income riders from on-board survey
537	Suburban Local	11.7%	44.0%	Changed from non-Low-Income to Low-Income given percent low-income riders from on-board survey
539	Suburban Local	28.5%	54.0%	Changed from non-Low-Income to Low-Income given percent low-income riders from on-board survey
552	Commuter and Express	55.4%	10.0%	Changed from Low-Income to non-Low-Income given percent low-income riders from on-board survey
553	Commuter and Express	35.9%	2.0%	Changed from Low-Income to non-Low-Income given percent low-income riders from on-board survey
554	Commuter and Express	40.2%	10.0%	Changed from Low-Income to non-Low-Income given percent low-income riders from on-board survey
579	Commuter and Express	37.5%	7.0%	Changed from Low-Income to non-Low-Income given percent low-income riders from on-board survey
615	Suburban Local	18.9%	60.0%	Changed from non-Low-Income to Low-Income given percent low-income riders from on-board survey
664	Commuter and Express	59.7%	15.0%	Changed from Low-Income to non-Low-Income given percent low-income riders from on-board survey
668	Commuter and Express	36.2%	5.0%	Changed from Low-Income to non-Low-Income given percent low-income riders from on-board survey
670	Commuter and Express	28.1%	42.0%	Changed from non-Low-Income to Low-Income given percent low-income riders from on-board survey
705	Suburban Local	30.6%	63.0%	Changed from non-Low-Income to Low-Income given percent low-income riders from on-board survey
758	Commuter and Express	34.0%	0.0%	Changed from Low-Income to non-Low-Income given percent low-income riders from on-board survey
762	Commuter and Express	93.2%	0.0%	Changed from Low-Income to non-Low-Income given percent low-income riders from on-board survey
763	Commuter and Express	48.5%	4.0%	Changed from Low-Income to non-Low-Income given percent low-income riders from on-board survey
764	Commuter and Express	52.2%	17.0%	Changed from Low-Income to non-Low-Income given percent low-income riders from on-board survey
765	Commuter and Express	54.2%	0.0%	Changed from Low-Income to non-Low-Income given percent low-income riders from on-board survey

Route	Route Type	Percent of Area Served Located in Census Block Groups Where the Percentage Low-Income Population Exceeds the Percentage Low-Income Population in the Service Area	Percent Low-Income Riders from On-Board Survey (Avg.=39.9%)	Notes on Modified Designation
767	Commuter and Express	47.9%	1.0%	Changed from Low-Income to non-Low-Income given percent low-income riders from on-board survey
805	Suburban Local	28.8%	62.0%	Changed from non-Low-Income to Low-Income given percent low-income riders from on-board survey
824	Core Local	48.7%	5.0%	Changed from Low-Income to non-Low-Income given percent low-income riders from on-board survey
831	Suburban Local	27.5%	69.0%	Changed from non-Low-Income to Low-Income given percent low-income riders from on-board survey
854	Commuter and Express	42.7%	8.0%	Changed from Low-Income to non-Low-Income given percent low-income riders from on-board survey

APPENDIX E: VEHICLE LOAD

Table 29: Vehicle Overloads by Route (2019)

Route type abbreviations: CL = core local; Supp L = supporting local; Sub L = suburban local; C & E = commuter & express; Art BRT = arterial BRT; Hwy BRT = highway BRT

Race/ethnicity designation abbreviations: B = BIPOC; NB = non-BIPOC

Income designation abbreviations: LI = low-income; NLI = non-low-income

Route	Route Type	Race/Ethnicity Designation	Income Designation	Pct. of Weekday Trip Observations with an Overload	Weekday Sched. Trips Consistently Overloaded	Pct. of Weekday Sched. Trips Consistently Overloaded
2	CL	B	LI	0.4%	-	0.0%
3	CL	B	LI	5.8%	2	1.0%
4	CL	NB	LI	2.5%	-	0.0%
5	CL	B	LI	3.7%	-	0.0%
6	CL	NB	LI	2.8%	1	0.5%
7	CL	B	LI	0.0%	-	0.0%
9	CL	B	LI	0.2%	-	0.0%
10	CL	B	LI	3.1%	1	0.5%
11	CL	B	LI	1.7%	-	0.0%
12	CL	NB	LI	1.4%	-	0.0%
14	CL	B	LI	0.3%	-	0.0%
16	Supp L	B	LI	0.0%	-	0.0%
17	CL	NB	LI	4.0%	3	2.1%
18	CL	B	LI	2.7%	-	0.0%
19	CL	B	LI	0.0%	-	0.0%
21	CL	B	LI	2.2%	-	0.0%
22	CL	B	LI	0.8%	-	0.0%
23	Supp L	NB	NLI	0.0%	-	0.0%
25	CL	NB	NLI	0.3%	-	0.0%
27	Supp L	B	LI	0.2%	-	0.0%
30	Supp L	B	LI	0.0%	-	0.0%
32	Supp L	B	LI	0.1%	-	0.0%
39	Supp L	NB	NLI	0.0%	-	0.0%
46	Supp L	NB	NLI	0.1%	-	0.0%
53	CL	B	LI	3.3%	-	0.0%
54	CL	B	LI	2.0%	1	0.6%
59	CL	B	LI	2.2%	-	0.0%
61	CL	B	LI	0.5%	-	0.0%
62	CL	B	LI	0.1%	-	0.0%
63	CL	B	LI	0.5%	-	0.0%
64	CL	B	LI	0.4%	-	0.0%
65	Supp L	B	LI	0.0%	-	0.0%
67	CL	B	LI	0.0%	-	0.0%
68	CL	B	LI	0.4%	-	0.0%
70	CL	B	LI	0.0%	-	0.0%
71	CL	B	LI	0.0%	-	0.0%
74	CL	B	LI	0.4%	-	0.0%
75	CL	B	LI	0.0%	-	0.0%
80	Supp L	B	LI	0.0%	-	0.0%
83	Supp L	B	LI	0.1%	-	0.0%
84	Supp L	NB	LI	0.0%	-	0.0%
87	Supp L	NB	LI	0.0%	-	0.0%
94	C&E	B	LI	2.6%	1	1.2%
111	C&E	B	NLI	0.0%	-	0.0%
113	C&E	NB	LI	4.4%	-	0.0%

Route	Route Type	Race/Ethnicity Designation	Income Designation	Pct. of Weekday Trip Observations with an Overload	Weekday Sched. Trips Consistently Overloaded	Pct. of Weekday Sched. Trips Consistently Overloaded
114	C&E	NB	LI	6.3%	1	5.3%
115	C&E	NB	LI	0.0%	-	0.0%
118	C&E	NB	LI	0.0%	-	0.0%
129	Supp L	B	LI	0.0%	-	0.0%
133	C&E	NB	NLI	0.6%	-	0.0%
134	C&E	NB	NLI	1.4%	-	0.0%
135	C&E	NB	NLI	1.0%	-	0.0%
141	CL	NB	NLI	3.8%	-	0.0%
146	C&E	NB	NLI	2.5%	-	0.0%
156	C&E	NB	NLI	14.3%	2	11.1%
219	Sub L	B	LI	0.2%	-	0.0%
223	Sub L	B	LI	1.5%	-	0.0%
225	Sub L	NB	NLI	0.1%	-	0.0%
227	Sub L	B	LI	0.0%	-	0.0%
250	C&E	NB	NLI	1.9%	1	1.8%
252	C&E	NB	NLI	1.0%	-	0.0%
261	C&E	NB	NLI	3.0%	-	0.0%
262	CL	NB	NLI	0.0%	-	0.0%
263	C&E	B	NLI	2.2%	-	0.0%
264	C&E	B	NLI	2.5%	-	0.0%
265	C&E	NB	NLI	0.0%	-	0.0%
270	C&E	B	NLI	8.5%	1	3.3%
272	C&E	NB	NLI	0.0%	-	0.0%
275	C&E	NB	NLI	5.2%	-	0.0%
288	C&E	NB	NLI	6.8%	-	0.0%
294	C&E	NB	NLI	3.3%	-	0.0%
350	C&E	B	NLI	0.0%	-	0.0%
351	C&E	B	NLI	3.0%	-	0.0%
353	C&E	NB	NLI	3.4%	-	0.0%
355	C&E	NB	NLI	7.8%	-	0.0%
361	C&E	NB	NLI	1.5%	-	0.0%
364	C&E	NB	NLI	0.0%	-	0.0%
365	C&E	NB	NLI	3.8%	-	0.0%
375	C&E	NB	NLI	5.5%	-	0.0%
415	Sub L	B	LI	0.0%	-	0.0%
417	Sub L	NB	NLI	0.0%	-	0.0%
452	C&E	NB	NLI	0.5%	-	0.0%
467	C&E	NB	NLI	16.5%	3	9.7%
515	Sub L	B	LI	0.0%	-	0.0%
535	C&E	B	LI	0.3%	-	0.0%
537	Sub L	NB	LI	0.0%	-	0.0%
538	Sub L	B	LI	0.0%	-	0.0%
539	Sub L	B	LI	0.1%	-	0.0%
540	Sub L	B	LI	0.0%	-	0.0%
542	Sub L	B	LI	0.0%	-	0.0%
552	C&E	B	NLI	3.0%	-	0.0%
553	C&E	B	NLI	0.5%	-	0.0%
554	C&E	B	NLI	0.2%	-	0.0%
558	C&E	B	NLI	3.6%	-	0.0%
578	C&E	B	NLI	3.9%	-	0.0%
579	C&E	NB	NLI	0.9%	-	0.0%
587	C&E	NB	NLI	2.3%	-	0.0%
588	C&E	B	LI	0.0%	-	0.0%
589	C&E	NB	NLI	1.4%	-	0.0%
597	C&E	NB	NLI	2.2%	-	0.0%
604	Sub L	NB	NLI	0.0%	-	0.0%

Route	Route Type	Race/Ethnicity Designation	Income Designation	Pct. of Weekday Trip Observations with an Overload	Weekday Sched. Trips Consistently Overloaded	Pct. of Weekday Sched. Trips Consistently Overloaded
612	Sub L	B	LI	0.0%	-	0.0%
615	Sub L	B	LI	0.0%	-	0.0%
643	C&E	NB	NLI	0.0%	-	0.0%
645	Sub L	NB	NLI	0.5%	-	0.0%
652	C&E	NB	NLI	2.1%	-	0.0%
663	C&E	NB	NLI	5.0%	-	0.0%
664	C&E	NB	NLI	1.1%	-	0.0%
667	C&E	NB	NLI	2.3%	-	0.0%
668	C&E	B	NLI	0.5%	-	0.0%
670	C&E	B	LI	2.4%	-	0.0%
671	C&E	NB	NLI	0.0%	-	0.0%
672	C&E	NB	NLI	0.1%	-	0.0%
673	C&E	NB	NLI	5.4%	-	0.0%
674	C&E	NB	NLI	0.3%	-	0.0%
677	C&E	NB	NLI	1.6%	-	0.0%
679	C&E	NB	NLI	0.0%	-	0.0%
705	Sub L	B	LI	0.0%	-	0.0%
716	Sub L	B	LI	0.1%	-	0.0%
717	Sub L	B	LI	0.1%	-	0.0%
721	Sub L	B	LI	0.2%	-	0.0%
722	Sub L	B	LI	0.0%	-	0.0%
723	Sub L	B	LI	0.2%	-	0.0%
724	Sub L	B	LI	0.4%	-	0.0%
755	C&E	B	LI	0.0%	-	0.0%
756	C&E	B	NLI	4.4%	-	0.0%
758	C&E	NB	NLI	5.9%	-	0.0%
760	C&E	B	LI	3.0%	-	0.0%
761	C&E	B	LI	4.8%	-	0.0%
762	C&E	B	NLI	0.0%	-	0.0%
763	C&E	B	NLI	0.8%	-	0.0%
764	C&E	B	NLI	2.7%	-	0.0%
765	C&E	B	NLI	2.8%	-	0.0%
766	C&E	B	NLI	2.9%	-	0.0%
767	C&E	B	NLI	0.2%	-	0.0%
768	C&E	B	NLI	13.4%	2	5.3%
801	Sub L	B	LI	0.0%	-	0.0%
805	Sub L	NB	LI	0.0%	-	0.0%
824	CL	B	NLI	0.0%	-	0.0%
825	CL	NB	NLI	0.3%	-	0.0%
831	Sub L	NB	LI	0.0%	-	0.0%
850	C&E	NB	NLI	10.5%	1	2.3%
852	C&E	NB	LI	0.9%	-	0.0%
854	C&E	NB	NLI	1.2%	-	0.0%
860	C&E	NB	NLI	1.3%	-	0.0%
865	C&E	NB	NLI	4.3%	-	0.0%
METRO Red Line	Hwy BRT	NB	NLI	0.0%	-	0.0%
METRO A Line	Art BRT	NB	LI	0.2%	-	0.0%
METRO C Line	Art BRT	B	LI	0.2%	-	0.0%

APPENDIX F: ON-TIME PERFORMANCE

Table 30: On-Time Performance by Route (2019)

Percent of timepoint crossings considered on-time

Route type abbreviations: CL = core local bus; Supp L = supporting local bus; Sub L = suburban local bus; C&E = commuter & express bus; Art BRT = arterial BRT; Hwy BRT = highway BRT; CR = commuter rail; LR = light rail

Race/ethnicity designation abbreviations: B = BIPOC; NB = non-BIPOC
Income designation abbreviations: LI = low-income; NLI = non-low-income

Route	Route Type	Race/Ethnicity Designation	Income Designation	Weekday	Saturday	Sunday	Total
2	CL	B	LI	86%	83%	84%	85%
3	CL	B	LI	83%	88%	88%	84%
4	CL	NB	LI	76%	80%	79%	76%
5	CL	B	LI	78%	79%	79%	78%
6	CL	NB	LI	77%	85%	81%	78%
7	CL	B	LI	80%	78%	88%	81%
9	CL	B	LI	80%	80%	82%	80%
10	CL	B	LI	78%	81%	81%	79%
11	CL	B	LI	80%	86%	77%	81%
12	CL	NB	LI	72%	-	-	72%
14	CL	B	LI	83%	83%	80%	83%
16	Supp L	B	LI	82%	86%	88%	83%
17	CL	NB	LI	77%	71%	76%	76%
18	CL	B	LI	83%	84%	81%	83%
19	CL	B	LI	81%	86%	85%	82%
21	CL	B	LI	83%	82%	83%	83%
22	CL	B	LI	75%	72%	74%	74%
23	Supp L	NB	NLI	86%	87%	83%	86%
25	CL	NB	NLI	74%	86%	-	75%
27	Supp L	B	LI	93%	-	-	93%
30	Supp L	B	LI	83%	88%	83%	83%
32	Supp L	B	LI	86%	89%	93%	87%
39	Supp L	NB	NLI	92%	-	-	92%
46	Supp L	NB	NLI	84%	81%	79%	83%
53	CL	B	LI	82%	-	-	82%
54	CL	B	LI	85%	85%	80%	85%
59	CL	B	LI	73%	-	-	73%
61	CL	B	LI	83%	85%	-	83%
62	CL	B	LI	92%	92%	94%	92%
63	CL	B	LI	86%	85%	85%	86%
64	CL	B	LI	87%	85%	87%	87%
65	Supp L	B	LI	96%	97%	97%	96%
67	CL	B	LI	87%	83%	85%	86%
68	CL	B	LI	92%	91%	94%	92%
70	CL	B	LI	88%	88%	97%	88%
71	CL	B	LI	94%	94%	94%	94%
74	CL	B	LI	89%	92%	93%	90%
75	CL	B	LI	90%	-	-	90%

Route	Route Type	Race/Ethnicity Designation	Income Designation	Weekday	Saturday	Sunday	Total
80	Supp L	B	LI	97%	94%	92%	96%
83	Supp L	B	LI	84%	88%	89%	86%
84	Supp L	NB	LI	83%	85%	88%	84%
87	Supp L	NB	LI	91%	91%	95%	91%
94	C&E	B	LI	89%	-	-	89%
111	C&E	B	NLI	73%	-	-	73%
113	C&E	NB	LI	82%	-	-	82%
114	C&E	NB	LI	88%	-	-	88%
115	C&E	NB	LI	76%	-	-	76%
118	C&E	NB	LI	83%	-	-	83%
129	Supp L	B	LI	99%	-	-	99%
133	C&E	NB	NLI	81%	-	-	81%
134	C&E	NB	NLI	76%	-	-	76%
135	C&E	NB	NLI	74%	-	-	74%
141	CL	NB	NLI	74%	-	-	74%
146	C&E	NB	NLI	81%	-	-	81%
156	C&E	NB	NLI	77%	-	-	77%
219	Sub L	B	LI	88%	88%	-	88%
223	Sub L	B	LI	90%	-	-	90%
225	Sub L	NB	NLI	79%	90%	-	81%
227	Sub L	B	LI	88%	93%	-	89%
250	C&E	NB	NLI	83%	-	-	83%
252	C&E	NB	NLI	89%	-	-	89%
261	C&E	NB	NLI	84%	-	-	84%
262	CL	NB	NLI	83%	-	-	83%
263	C&E	B	NLI	85%	-	-	85%
264	C&E	B	NLI	81%	-	-	81%
265	C&E	NB	NLI	91%	-	-	91%
270	C&E	B	NLI	86%	-	-	86%
272	C&E	NB	NLI	78%	-	-	78%
275	C&E	NB	NLI	97%	-	-	97%
288	C&E	NB	NLI	85%	-	-	85%
294	C&E	NB	NLI	82%	-	-	82%
350	C&E	B	NLI	89%	-	-	89%
351	C&E	B	NLI	92%	-	-	92%
353	C&E	NB	NLI	90%	-	-	90%
355	C&E	NB	NLI	86%	-	-	86%
361	C&E	NB	NLI	90%	-	-	90%
364	C&E	NB	NLI	87%	-	-	87%
365	C&E	NB	NLI	85%	-	-	85%
375	C&E	NB	NLI	92%	-	-	92%
415	Sub L	B	LI	86%	-	-	86%
417	Sub L	NB	NLI	87%	-	-	87%
452	C&E	NB	NLI	83%	-	-	83%
467	C&E	NB	NLI	87%	-	-	87%
515	Sub L	B	LI	96%	97%	94%	96%
535	C&E	B	LI	86%	-	-	86%
537	Sub L	NB	LI	97%	-	-	97%

Route	Route Type	Race/Ethnicity Designation	Income Designation	Weekday	Saturday	Sunday	Total
538	Sub L	B	LI	91%	82%	76%	88%
539	Sub L	B	LI	85%	95%	96%	86%
540	Sub L	B	LI	90%	80%	83%	89%
542	Sub L	B	LI	83%	-	-	83%
552	C&E	B	NLI	78%	-	-	78%
553	C&E	B	NLI	82%	-	-	82%
554	C&E	B	NLI	77%	-	-	77%
558	C&E	B	NLI	82%	-	-	82%
578	C&E	B	NLI	85%	-	-	85%
579	C&E	NB	NLI	83%	-	-	83%
587	C&E	NB	NLI	74%	-	-	74%
588	C&E	B	LI	77%	-	-	77%
589	C&E	NB	NLI	68%	-	-	68%
597	C&E	NB	NLI	78%	-	-	78%
604	Sub L	NB	NLI	95%	-	-	95%
612	Sub L	B	LI	86%	84%	79%	84%
615	Sub L	B	LI	81%	85%	-	82%
643	C&E	NB	NLI	90%	-	-	90%
645	Sub L	NB	NLI	74%	68%	79%	74%
652	C&E	NB	NLI	74%	-	-	74%
663	C&E	NB	NLI	82%	-	-	82%
664	C&E	NB	NLI	84%	-	-	84%
667	C&E	NB	NLI	76%	-	-	76%
668	C&E	B	NLI	69%	-	-	69%
670	C&E	B	LI	70%	-	-	70%
671	C&E	NB	NLI	78%	-	-	78%
672	C&E	NB	NLI	83%	-	-	83%
673	C&E	NB	NLI	84%	-	-	84%
674	C&E	NB	NLI	80%	-	-	80%
677	C&E	NB	NLI	77%	-	-	77%
679	C&E	NB	NLI	95%	-	-	95%
705	Sub L	B	LI	78%	-	-	78%
716	Sub L	B	LI	82%	82%	-	82%
717	Sub L	B	LI	86%	-	-	86%
721	Sub L	B	LI	86%	89%	90%	87%
722	Sub L	B	LI	94%	90%	91%	93%
723	Sub L	B	LI	90%	87%	93%	90%
724	Sub L	B	LI	91%	93%	96%	92%
755	C&E	B	LI	79%	-	-	79%
756	C&E	B	NLI	70%	-	-	70%
758	C&E	NB	NLI	78%	-	-	78%
760	C&E	B	LI	81%	-	-	81%
761	C&E	B	LI	81%	-	-	81%
762	C&E	B	NLI	68%	-	-	68%
763	C&E	B	NLI	81%	-	-	81%
764	C&E	B	NLI	80%	-	-	80%
765	C&E	B	NLI	82%	-	-	82%
766	C&E	B	NLI	83%	-	-	83%

Route	Route Type	Race/Ethnicity Designation	Income Designation	Weekday	Saturday	Sunday	Total
767	C&E	B	NLI	89%	-	-	89%
768	C&E	B	NLI	85%	-	-	85%
801	Sub L	B	LI	85%	-	-	85%
805	Sub L	NB	LI	71%	78%	-	72%
824	CL	B	NLI	82%	-	-	82%
825	CL	NB	NLI	73%	-	-	73%
831	Sub L	NB	LI	97%	-	-	97%
850	C&E	NB	NLI	84%	-	-	84%
852	C&E	NB	LI	83%	85%	-	83%
854	C&E	NB	NLI	81%	-	-	81%
860	C&E	NB	NLI	80%	-	-	80%
865	C&E	NB	NLI	87%	-	-	87%
Northstar	CR	NB	NLI	93%	97%	98%	94%
METRO Blue Line	LR	B	LI	-	-	-	85%
METRO Green Line	LR	B	LI	-	-	-	72%
METRO Red Line	Hwy BRT	NB	NLI	93%	91%	96%	93%
METRO A Line	Art BRT	NB	LI	91%	90%	87%	90%
METRO C Line	Art BRT	B	LI	81%	84%	86%	82%

APPENDIX G: ROUTE SPACING

Route spacing results by Transit Market Areas and route type, for fall 2019 and fall 2020, are shown Figure 6 through Figure 11. In some instances, route spacing standards for supporting local routes are not met for practical reasons – wherein the area is already sufficiently covered by core local routes. These instances are noted on the figures.

Differences between fall 2019 and fall 2020 are minor, with the most notable appearing when considering route spacing for supporting local routes. Substantial differences and their causes are noted on the figures.

Figure 6.

Core Local Route Spacing in Market Area I (2019)

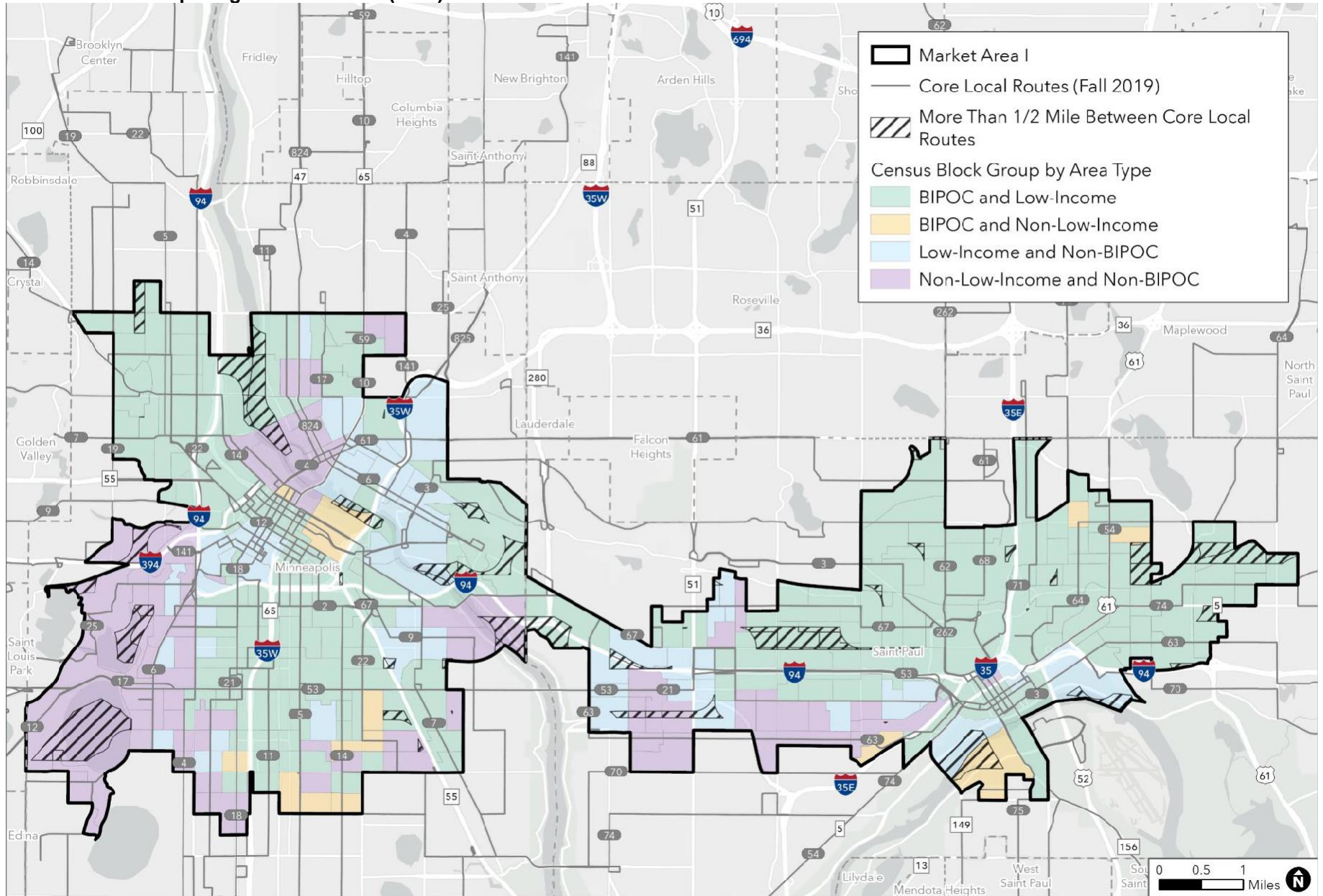


Figure 7. Supporting Local Route Spacing in Market Area I (2019)

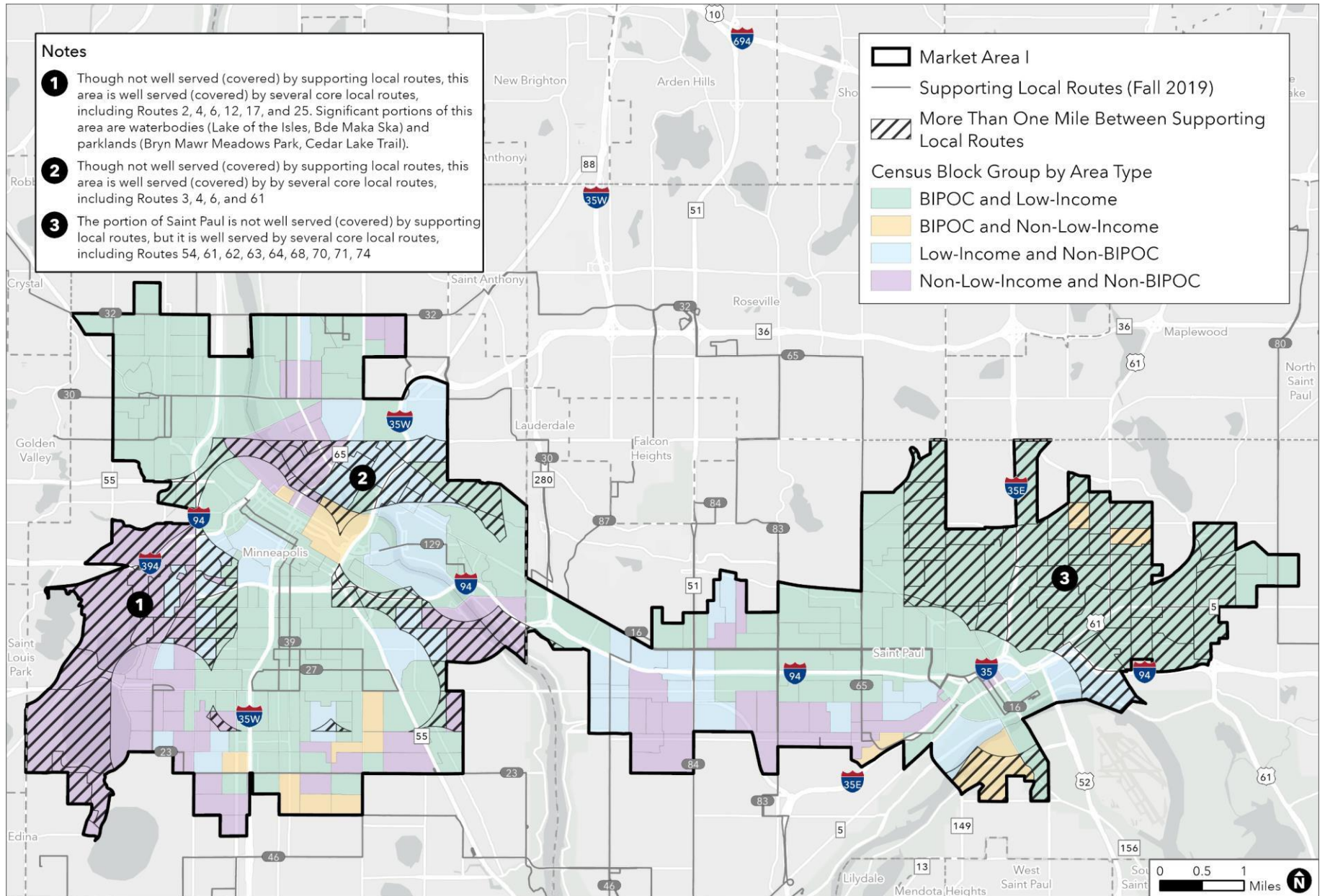


Figure 8. Local Route Spacing in Market Area II (2019)

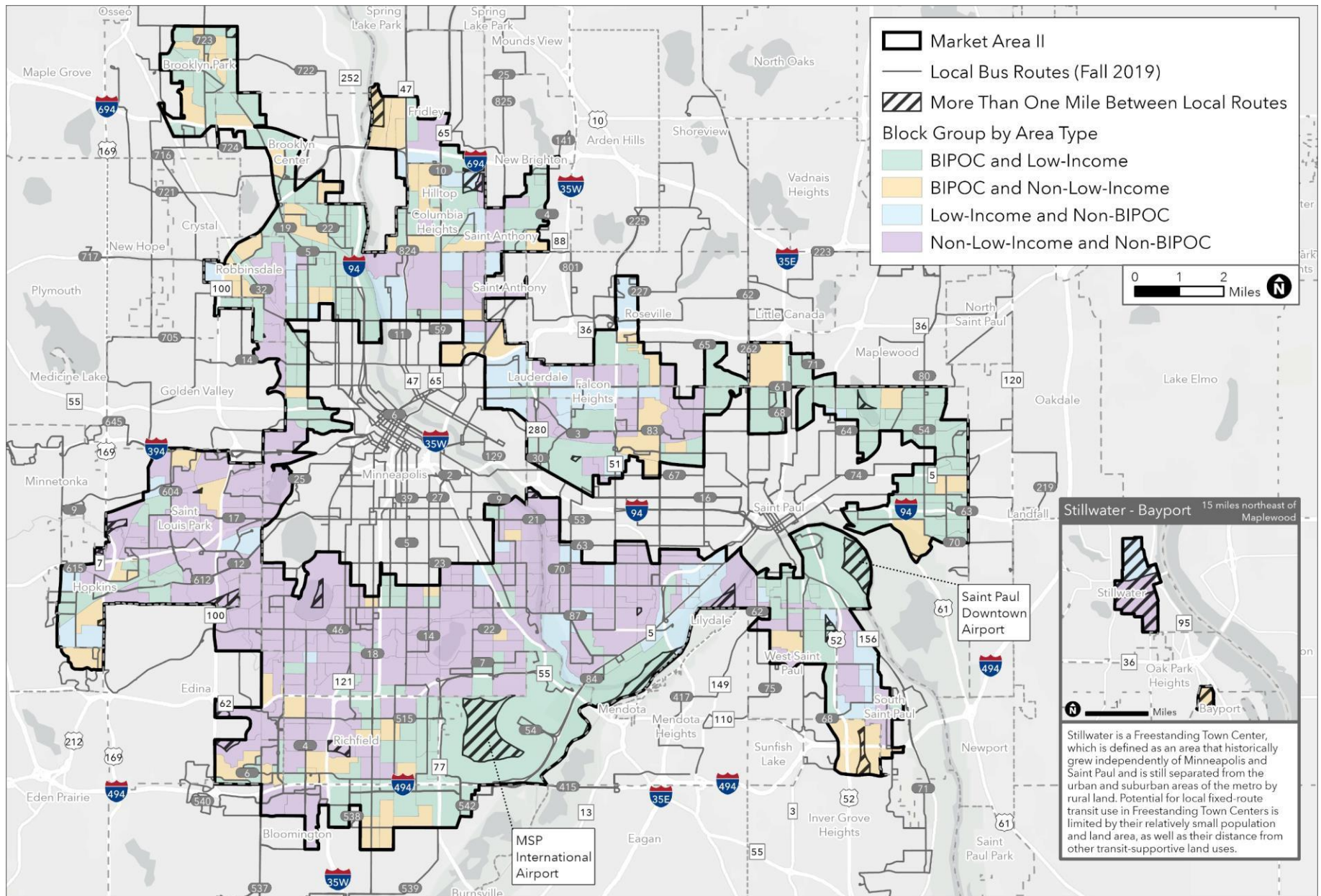


Figure 9. Core Local Route Spacing in Market Area I (2020)

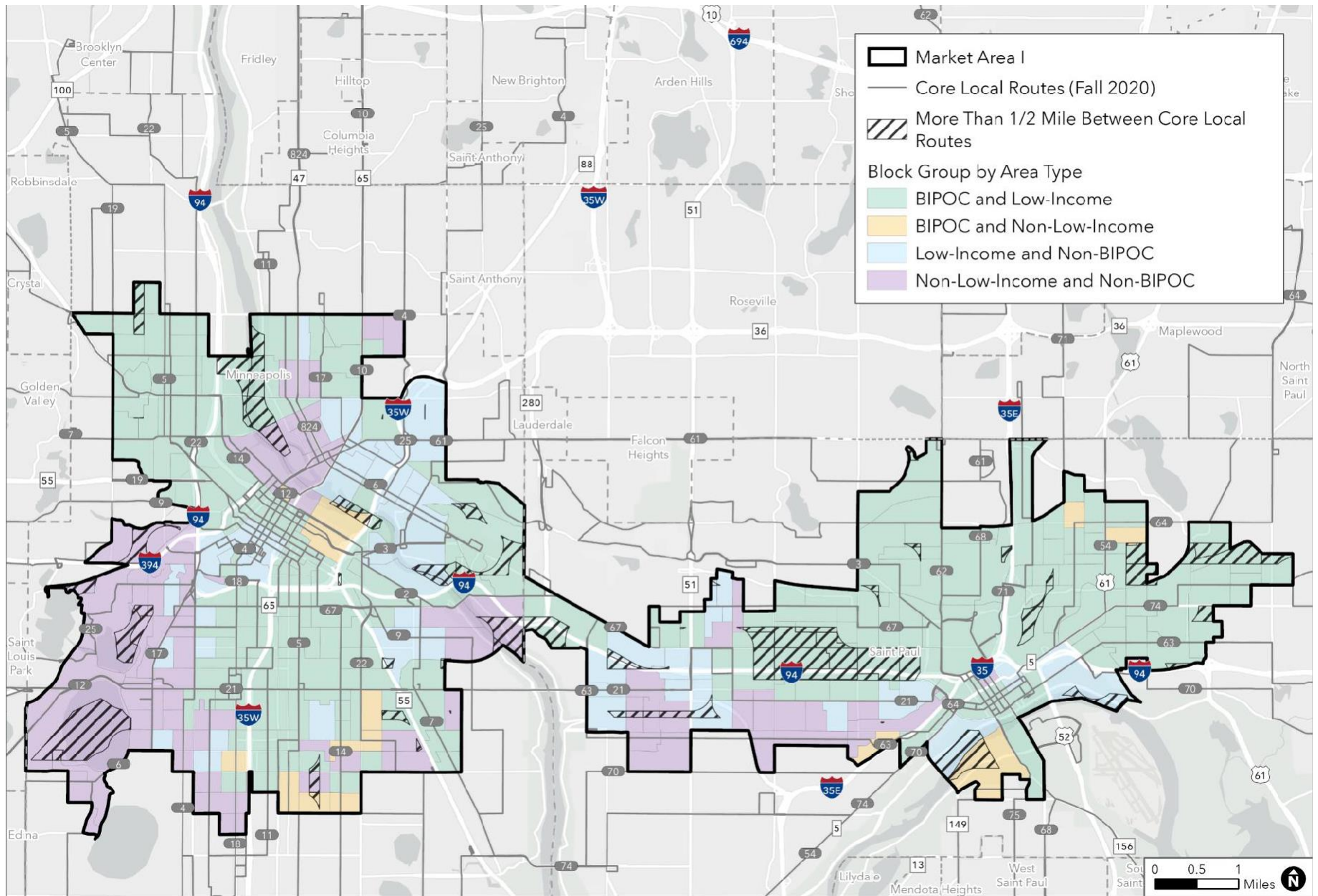


Figure 10. Supporting Local Route Spacing in Market Area I (2020)

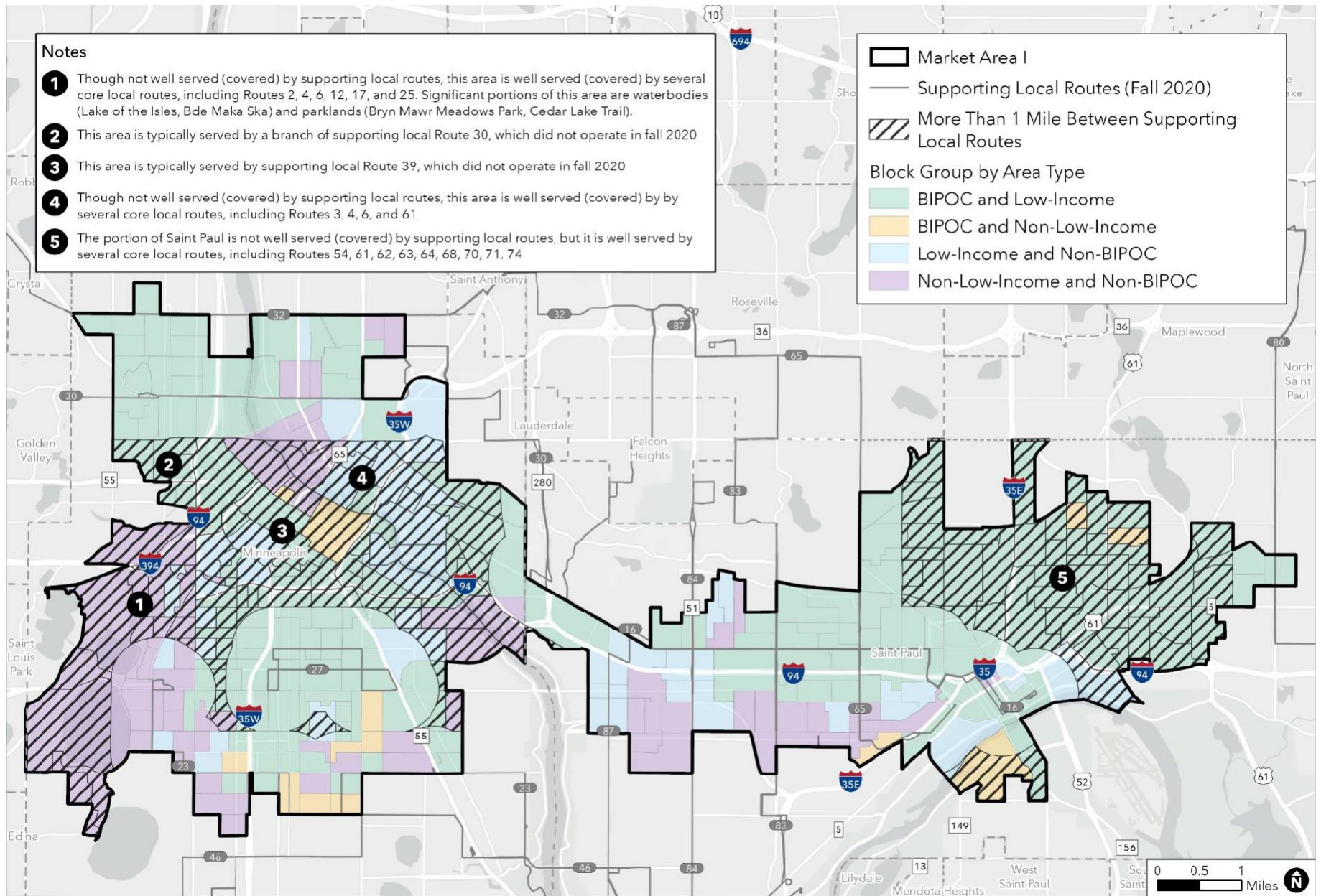
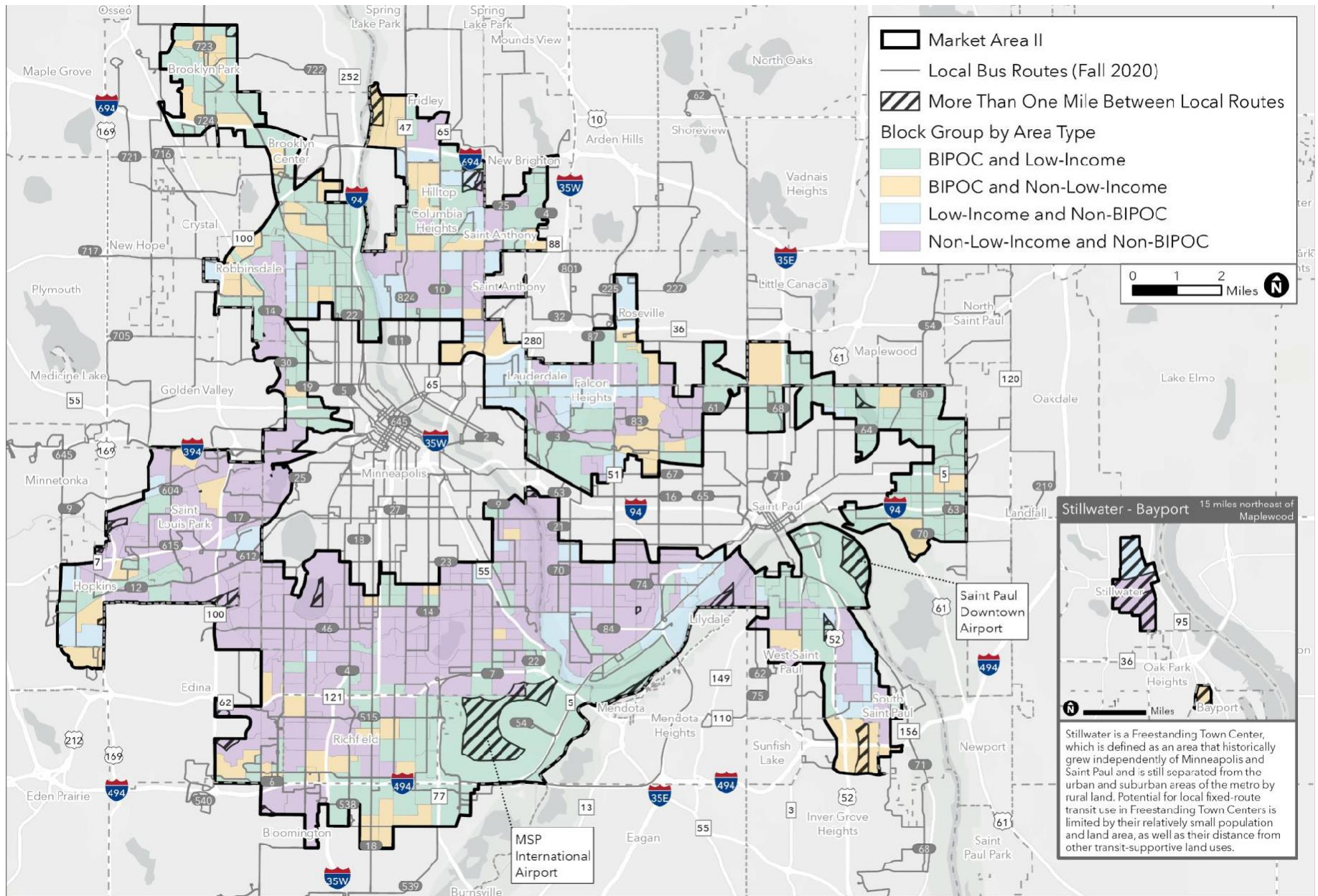


Figure 11. Local Route Spacing in Market Area II (2020)



APPENDIX H: MIDDAY SERVICE AVAILABILITY

Midday service availability for Market Areas I, II, and III in fall 2019 and fall 2020 is shown in Figure 12 and Figure 13, respectively. Stops in Market Area III have low adherence to midday headway standards, and as a result the combined map shows good coverage at the core and limited coverage at the system margins. Differences between fall 2019 and fall 2020 are minor, with the most notable appearing in Little Canada and Shoreview near I-35E and I-694 as a result of reduced/suspended service in fall 2020.

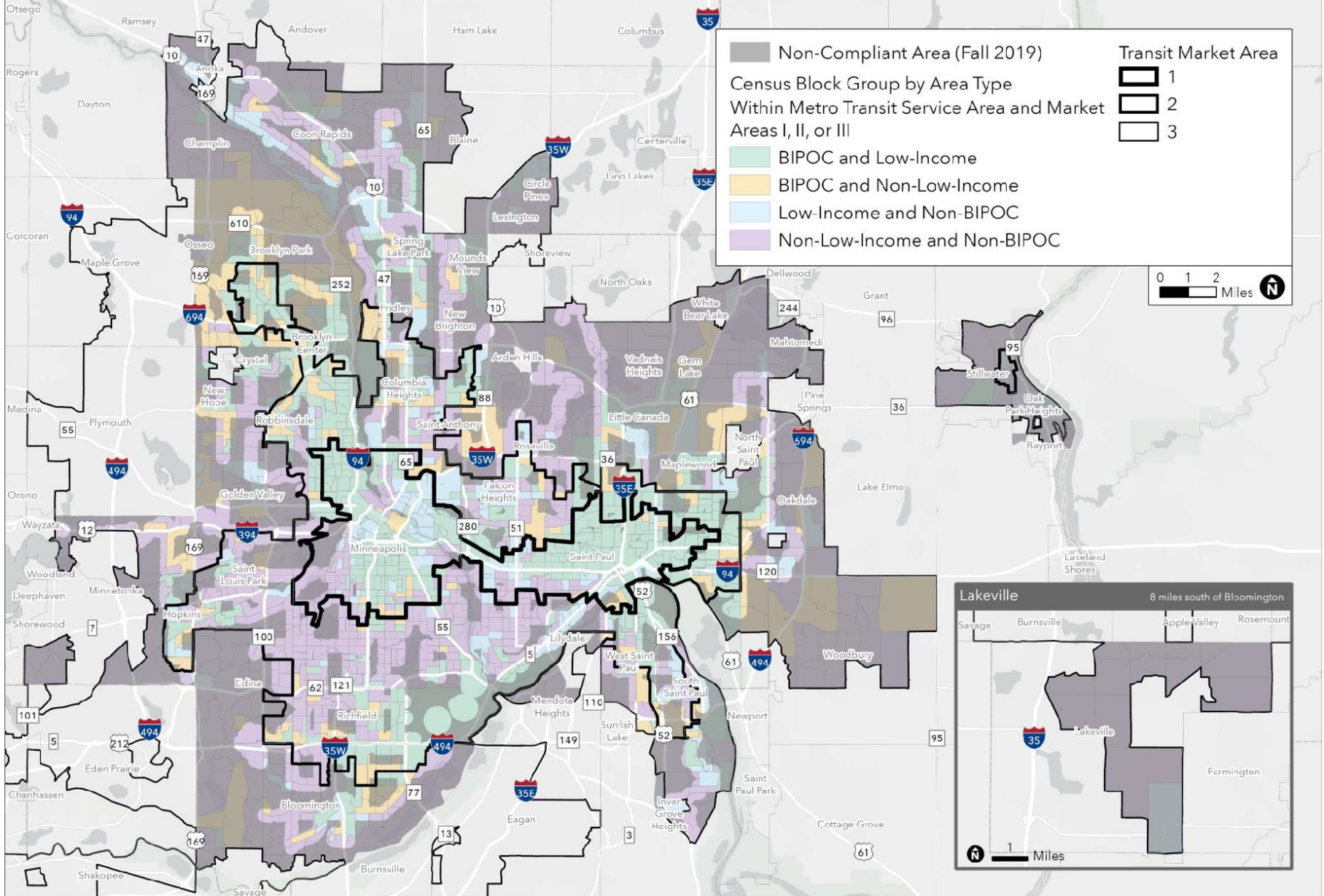
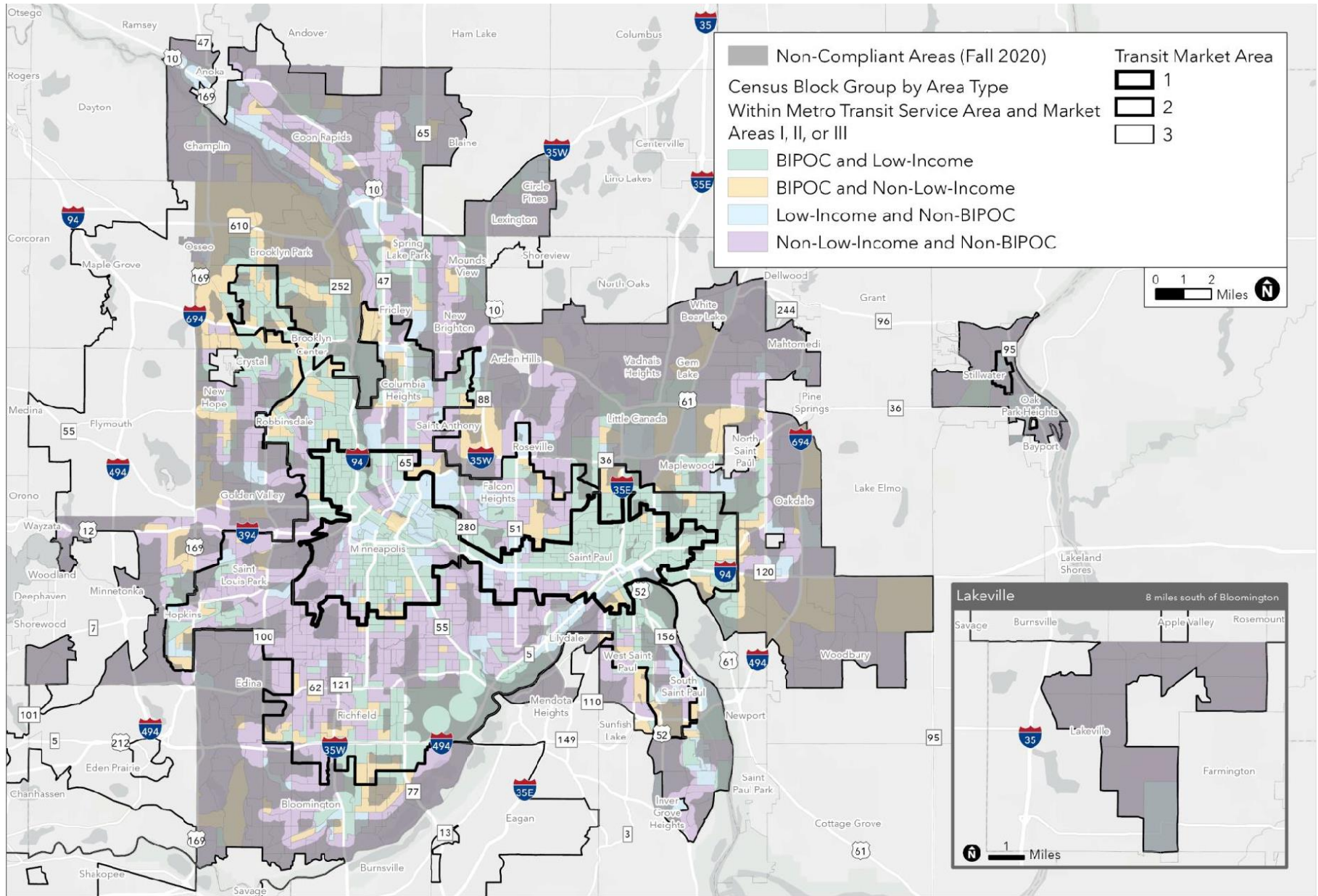


Figure 13. Midday Service Standards Compliance in Market Areas I, II and III (2020)



APPENDIX I: VEHICLE ASSIGNMENT

For the most part, route trips in fall 2019 were assigned buses that were newer than would be expected based on the available fleet averages. There are two reasons for this:

1. Newer buses tend to be more reliable and therefore more available to be assigned to work
2. Old buses were retired and removed from the active revenue fleet during the evaluation period. They appear in the averages as if they had been in service during the whole period.

Table 31 summarizes fall 2019 vehicle assignment data by route. Of the 149 Metro Transit bus routes evaluated, 52 were assigned buses that, on average, were older than would have been expected given the average fleet age. Of those 52 routes, only 2 were, on average, assigned buses more than 2 year older and beyond 1 standard deviation of the age that would be expected: Route 350 (BIPOC and non-low-income) and Route 353 (non-BIPOC and non-low-income), both commuter and express route types.

Table 31: Vehicle Age in Years by Route (2019)

Route type abbreviations: CL = core local; Supp L = supporting local; Sub L = suburban local; C&E = commuter & express; Art BRT = arterial BRT; Hwy BRT = highway BRT

Race/ethnicity designation abbreviations: B = BIPOC; NB = non-

BIPOC Income designation abbreviations: LI = low-income; NLI = non-low-income

Route	Route Type	Race/Ethnicity Designation	Income Designation	Assigned Avg.	Assigned Std.	Available Avg.	Difference if Older	Assigned Relative to Available
2	CL	B	LI	5.2	2.5	6.7		Newer
3	CL	B	LI	6.9	2.9	7.1		Newer
4	CL	NB	LI	6.7	2.5	7.2		Newer
5	CL	B	LI	6.4	2.4	7.6		Newer
6	CL	NB	LI	7.2	2.5	8.0		Newer
7	CL	B	LI	6.7	2.3	7.1		Newer
9	CL	B	LI	7.0	2.4	6.7	0.3	Not sig. older
10	CL	B	LI	9.3	2.4	10.4		Newer
11	CL	B	LI	9.5	2.6	10.1		Newer
12	CL	NB	LI	7.1	2.8	6.7	0.4	Not sig. older
14	CL	B	LI	6.4	2.3	7.4		Newer
16	Supp L	B	LI	7.7	2.0	7.7	0.0	Not sig. older
17	CL	NB	LI	8.8	2.3	10.1		Newer
18	CL	B	LI	9.4	2.5	10.2		Newer
19	CL	B	LI	6.2	2.4	7.0		Newer
21	CL	B	LI	6.0	2.5	7.1		Newer
22	CL	B	LI	6.5	2.3	7.3		Newer
23	Supp L	NB	NLI	7.8	1.8	6.8	1.0	Not sig. older
25	CL	NB	NLI	9.1	2.4	10.4		Newer
27	Supp L	B	LI	1.6	0.2	1.9		Newer
30	Supp L	B	LI	7.1	2.5	7.7		Newer
32	Supp L	B	LI	6.6	2.2	6.6		Newer
39	Supp L	NB	NLI	8.5	2.2	6.7	1.8	Not sig. older
46	Supp L	NB	NLI	7.3	2.0	6.7	0.6	Not sig. older
53	CL	B	LI	7.6	2.9	7.6	0.0	Not sig. older
54	CL	B	LI	7.0	2.4	8.0		Newer
59	CL	B	LI	8.8	2.6	10.4		Newer
61	CL	B	LI	6.8	2.2	7.3		Newer
62	CL	B	LI	6.9	2.2	7.7		Newer

Route	Route Type	Race/Ethnicity Designation	Income Designation	Assigned Avg.	Assigned Std.	Available Avg.	Difference if Older	Assigned Relative to Available
63	CL	B	LI	7.4	2.7	8.3		Newer
64	CL	B	LI	7.2	2.7	8.1		Newer
65	Supp L	B	LI	7.4	2.3	7.7		Newer
67	CL	B	LI	7.1	2.0	7.2		Newer
68	CL	B	LI	7.3	2.5	8.1		Newer
70	CL	B	LI	7.9	2.5	7.7	0.1	Not sig. older
71	CL	B	LI	6.9	2.5	7.8		Newer
74	CL	B	LI	6.9	2.3	7.8		Newer
75	CL	B	LI	7.6	2.7	7.7		Newer
80	Supp L	B	LI	3.9	0.9	4.0		Newer
83	Supp L	B	LI	1.7	0.6	1.9		Newer
84	Supp L	NB	LI	7.4	2.4	7.7		Newer
87	Supp L	NB	LI	3.9	0.9	4.0		Newer
94	C&E	B	LI	7.7	3.0	8.0		Newer
111	C&E	B	NLI	9.2	2.2	8.5	0.7	Not sig. older
113	C&E	NB	LI	8.4	2.3	7.9	0.5	Not sig. older
114	C&E	NB	LI	8.5	1.9	8.6		Newer
115	C&E	NB	LI	8.4	1.8	9.2		Newer
118	C&E	NB	LI	7.6	2.7	7.7		Newer
129	Supp L	B	LI	7.0	2.2	6.4	0.7	Not sig. older
133	C&E	NB	NLI	7.9	2.3	6.7	1.2	Not sig. older
134	C&E	NB	NLI	8.7	2.0	8.8		Newer
135	C&E	NB	NLI	8.5	2.3	7.0	1.6	Not sig. older
141	CL	NB	NLI	6.9	2.3	6.5	0.4	Not sig. older
146	C&E	NB	NLI	8.0	2.5	7.7	0.3	Not sig. older
156	C&E	NB	NLI	8.0	2.5	6.7	1.3	Not sig. older
219	Sub L	B	LI	1.5	0.1	1.5		Newer
223	Sub L	B	LI	1.6	0.2	1.9		Newer
225	Sub L	NB	NLI	1.5	0.2	1.9		Newer
227	Sub L	B	LI	1.5	0.2	1.9		Newer
250	C&E	NB	NLI	8.2	3.4	8.6		Newer
252	C&E	NB	NLI	8.1	2.4	8.5		Newer
261	C&E	NB	NLI	8.7	2.6	9.0		Newer
262	CL	NB	NLI	8.3	2.5	7.7	0.6	Not sig. older
263	C&E	B	NLI	7.8	3.2	7.1	0.7	Not sig. older
264	C&E	B	NLI	7.8	2.6	7.9		Newer
265	C&E	NB	NLI	7.7	3.2	7.3	0.4	Not sig. older
270	C&E	B	NLI	7.4	3.2	7.2	0.2	Not sig. older
272	C&E	NB	NLI	9.0	2.6	7.7	1.2	Not sig. older
275	C&E	NB	NLI	9.1	2.3	9.0	0.1	Not sig. older
288	C&E	NB	NLI	9.0	2.2	9.2		Newer
294	C&E	NB	NLI	8.2	3.0	7.8	0.4	Not sig. older
350	C&E	B	NLI	13.1	1.1	8.3	4.8	More than 1 std. older
351	C&E	B	NLI	7.6	3.0	7.4	0.2	Not sig. older
353	C&E	NB	NLI	9.9	2.2	7.7	2.2	More than 1 std. older
355	C&E	NB	NLI	7.1	3.1	7.3		Newer
361	C&E	NB	NLI	9.0	2.8	7.6	1.4	Not sig. older
364	C&E	NB	NLI	1.7	0.3	1.9		Newer
365	C&E	NB	NLI	8.8	2.3	8.9		Newer
375	C&E	NB	NLI	7.2	3.1	7.0	0.1	Not sig. older
415	Sub L	B	LI	8.8	2.1	8.8		Newer
417	Sub L	NB	NLI	1.8	0.6	1.9		Newer
452	C&E	NB	NLI	9.1	2.1	8.7	0.4	Not sig. older
467	C&E	NB	NLI	8.6	1.6	8.5	0.1	Not sig. older
515	Sub L	B	LI	8.4	2.0	8.5		Newer
535	C&E	B	LI	8.5	1.9	8.9		Newer

Route	Route Type	Race/Ethnicity Designation	Income Designation	Assigned Avg.	Assigned Std.	Available Avg.	Difference if Older	Assigned Relative to Available
537	Sub L	NB	LI	3.9	1.0	4.0		Newer
538	Sub L	B	LI	3.9	0.9	4.0		Newer
539	Sub L	B	LI	3.7	0.8	4.0		Newer
540	Sub L	B	LI	8.2	2.8	7.7	0.5	Not sig. older
542	Sub L	B	LI	9.3	3.2	7.8	1.4	Not sig. older
552	C&E	B	NLI	10.0	1.8	8.7	1.3	Not sig. older
553	C&E	B	NLI	9.0	2.1	8.6	0.3	Not sig. older
554	C&E	B	NLI	9.3	2.7	9.9		Newer
558	C&E	B	NLI	9.1	2.1	8.5	0.6	Not sig. older
578	C&E	B	NLI	8.8	1.6	9.2		Newer
579	C&E	NB	NLI	9.1	2.2	8.7	0.4	Not sig. older
587	C&E	NB	NLI	8.9	2.2	8.8	0.1	Not sig. older
588	C&E	B	LI	9.4	2.3	8.5	0.9	Not sig. older
589	C&E	NB	NLI	9.1	2.2	8.5	0.7	Not sig. older
597	C&E	NB	NLI	8.9	1.8	9.1		Newer
604	Sub L	NB	NLI	1.8	0.4	1.9		Newer
612	Sub L	B	LI	5.6	2.4	6.7		Newer
615	Sub L	B	LI	1.7	0.4	1.9		Newer
643	C&E	NB	NLI	7.9	2.7	8.0		Newer
645	Sub L	NB	NLI	7.8	2.7	8.3		Newer
652	C&E	NB	NLI	7.4	2.6	7.8		Newer
663	C&E	NB	NLI	7.9	2.6	7.9	0.0	Not sig. older
664	C&E	NB	NLI	7.4	2.5	7.0	0.4	Not sig. older
667	C&E	NB	NLI	7.8	2.6	7.5	0.2	Not sig. older
668	C&E	B	NLI	7.5	2.5	7.5	0.1	Not sig. older
670	C&E	B	LI	3.8	1.9	8.3		Newer
671	C&E	NB	NLI	4.1	2.3	8.3		Newer
672	C&E	NB	NLI	7.5	2.5	7.6		Newer
673	C&E	NB	NLI	8.8	2.6	9.2		Newer
674	C&E	NB	NLI	6.9	2.1	6.4	0.5	Not sig. older
677	C&E	NB	NLI	8.3	2.5	8.2	0.1	Not sig. older
679	C&E	NB	NLI	7.2	2.5	7.0	0.2	Not sig. older
705	Sub L	B	LI	6.3	2.1	7.7		Newer
716	Sub L	B	LI	1.7	0.4	1.9		Newer
717	Sub L	B	LI	1.9	0.8	1.9		Newer
721	Sub L	B	LI	6.8	2.7	7.1		Newer
722	Sub L	B	LI	6.7	2.4	7.0		Newer
723	Sub L	B	LI	6.8	2.5	7.0		Newer
724	Sub L	B	LI	6.6	2.3	7.0		Newer
755	C&E	B	LI	6.5	2.2	6.7		Newer
756	C&E	B	NLI	8.5	2.5	8.5		Newer
758	C&E	NB	NLI	7.9	2.5	7.9		Newer
760	C&E	B	LI	6.9	3.9	8.2		Newer
761	C&E	B	LI	7.1	2.8	7.0	0.1	Not sig. older
762	C&E	B	NLI	7.5	2.6	7.7		Newer
763	C&E	B	NLI	7.0	3.4	7.6		Newer
764	C&E	B	NLI	7.3	4.0	8.5		Newer
765	C&E	B	NLI	7.2	2.7	7.9		Newer
766	C&E	B	NLI	7.2	2.7	7.3		Newer
767	C&E	B	NLI	7.0	2.1	6.4	0.6	Not sig. older
768	C&E	B	NLI	8.3	3.3	9.0		Newer
801	Sub L	B	LI	10.9	2.2	11.9		Newer
805	Sub L	NB	LI	8.8	0.0	8.8		Newer
824	CL	B	NLI	8.6	2.4	8.8		Newer
825	CL	NB	NLI	7.9	2.5	7.9	0.0	Not sig. older
831	Sub L	NB	LI	12.5	1.7	13.3		Newer
850	C&E	NB	NLI	7.0	4.4	8.7		Newer
852	C&E	NB	LI	6.2	3.0	7.7		Newer

Route	Route Type	Race/Ethnicity Designation	Income Designation	Assigned Avg.	Assigned Std.	Available Avg.	Difference if Older	Assigned Relative to Available
854	C&E	NB	NLI	6.8	4.0	8.3		Newer
860	C&E	NB	NLI	9.0	2.2	9.2		Newer
865	C&E	NB	NLI	5.4	0.9	5.3	0.1	Not sig. older
Red	Hwy BRT	NB	NLI	6.7	0.0	6.7		Newer
A	Art BRT	NB	LI	3.8	0.6	3.8	0.1	Not sig. older
C	Art BRT	B	LI	2.3	2.1	1.4	1.0	Not sig. older

Attachment I: Minutes noting Metropolitan Council approval of Title VI Program



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