TITLE VI PROGRAM

In Compliance with FTA Circular 4702.1B
January 2026



METROPOLITAN
COUNCIL

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

Metropolitan Council Members

Robin Hutcheson	Chair	Diego Morales	District 9
Judy Johnson	District 1	Peter Lindstrom	District 10
Reva Chamblis	District 2	Gail Cederberg	District 11
Tyronne Carter	District 3	Mark Jenkins	District 12
Deb Barber	District 4	Chai Lee	District 13
John Pacheco Jr.	District 5	Toni Carter	District 14
Robert Lilligren	District 6	Victor Obisakin	District 15
Yassin Osman	District 7	Wendy Wulff	District 16
Anjuli Cameron	District 8		



The Metropolitan Council is the regional planning organization for the seven-county Twin Cities area. The Metropolitan 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.

ON REQUEST, THIS PUBLICATION WILL BE MADE AVAILABLE IN ALTERNATIVE FORMATS TO PEOPLE WITH DISABILITIES. CALL METROPOLITAN COUNCIL INFORMATION AT 651-602-1140 OR TTY 651-291-0904.

Table of Contents

Introduction 5
- Metropolitan Council 5
- Metro Transit 5
- Other transportation services 6
- Title VI requirements 6
- Definitions 7

Part 1: General Requirements 11
- Title VI notice 12
- Title VI complaint procedures 13
- Title VI investigations, complaints, and lawsuits 15
- Public engagement 15
- Language Assistance Plan 38
- BIPOC representation on planning and advisory bodies 41
- Encouraging BIPOC community participation 42
- Subrecipient monitoring and provision of assistance 43
- Facility siting 45

Part 2: Fixed-Route Transit Provider Requirements 46
- Demographic analysis 46
- Existing facilities 50
- Recently completed and planned facilities 53
- Demographic profiles of ridership and travel patterns 58
- Service and fare equity analyses 72
- Evaluation methodology 76
- System-wide service standards and policies 79
- Service monitoring evaluation 91

Part 3: MPO Requirements 93
- Planning area demographics 93
- Incorporation of Title VI principles in regional planning 96
- Distribution of state and federal funds 96
- Results 99
- Distribution of FTA funds to subrecipients 100

Table of Attachments

Attachment A: Title VI Notices
Attachment B: Title VI Complaint Form
Attachment C: Public Engagement Plan
Attachment D: Transportation Addendum to the Public Engagement Plan
Attachment E: Language Assistance Plan
Attachment F: Minutes Noting Metropolitan Council Approval of Title VI Policies
Attachment G: Approved Service and Fare Equity Analyses
Attachment H: Approved Service Monitoring Evaluation
Attachment I: Minutes Noting Metropolitan Council Approval of Title VI Program

Table of Figures

Figure 1: Metro Transit Service 47
Figure 2: Metro Transit Service and Percent BIPOC Population 48
Figure 3: Metro Transit Service and Percent Low-Income Population 49
Figure 4: Existing Facilities and BIPOC Population 51
Figure 5: Existing Facilities and Low-Income Population 52
Figure 6: Planned and Recently Completed Facilities with BIPOC Population 56
Figure 7. Planned and Recently Completed Facilities with Low-Income Population 57
Figure 8: Race and Ethnicity 59
Figure 9: Race and Ethnicity Change, 2016-2022 60
Figure 10: Annual Household Income 61
Figure 11: Change in Household Income, 2016 to 2022 61
Figure 12: Language Spoken at Home 62
Figure 13: Ability to Speak English 63
Figure 14: Mode of Access 63
Figure 15: Mode of Access, Detailed 64
Figure 16: Mode of Egress 64
Figure 17. Mode of Egress, Detailed 65
Figure 18. Trip Purpose 66
Figure 19: Trip Purpose Change, 2016-2022 67
Figure 20. Number of Transfers per One-Way Trip 68
Figure 21. Riders Who Drive 69
Figure 22: Fare Payment Method 70
Figure 23: Fare Type 71
Figure 24: BIPOC Population within the MPO Planning Area 94
Figure 25: Low-Income Population within the MPO Planning Area 95
Figure 26: 2026-2029 TIP Projects and Percent BIPOC Population 98

Table of Tables

Table 1. Community and Culturally Based Organizations Contracted for Blue Line Extension Outreach and Engagement 28
Table 2. LEP Speakers in the Metro Transit Service Area 39
Table 3. Committee and Advisory Board Demographics 42
Table 4: Proximity to Metro Transit Service 50
Table 5: Recently Completed and Planned Transit Facility Improvements 53
Table 6. Survey Responses on DI/DB Threshold Change 75
Table 7. Recent Equity Analysis Results 78
Table 8: Transit Market Areas 80
Table 9: Vehicle Loading Standards 83
Table 10: Bus Headway Standards (Minimum Level of Service) 84
Table 11: Transitway Headway Standards (Minimum Level of Service) 84
Table 12: Bus Span of Service Standards 86
Table 13: Transitway Minimum Span of Service Standards 86
Table 14: Route Spacing Standards 87
Table 15: Stop Spacing Standards 87
Table 16: Customer Amenities at Transit Stops 88
Table 17: Service Monitoring Summary 92
Table 18: 2026-2029 TIP Funding Distribution by Predominantly BIPOC and Non-BIPOC Areas (MPO-wide) 99
Table 19: 2026-2029 TIP Funding Distribution by Predominantly BIPOC and Non-BIPOC Areas (Project Areas) 99

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 with Title VI of the Civil Rights Act of 1964.[1]

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. Metropolitan 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 Metropolitan Council by serving on key advisory committees.

The Metropolitan Council also provides essential services and infrastructure – Metro Transit's bus and rail system, Metro Mobility, Transit Link, Metro micro, 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 Metropolitan Council's role 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. It is one of the country's largest transit systems, and an established leader in the transit industry. Metro Transit is the primary public transportation operator in the Minneapolis-Saint Paul area and the largest operator in the state. Metro Transit runs an integrated network of buses, light rail transit, and micro transit, as well as resources for those who carpool, vanpool, walk, or bike, providing roughly 85 percent of the transit trips taken annually in the Twin Cities. In 2024, Metro Transit served 47.5 million bus and rail passengers with award-winning, energy-efficient fleets.

---

[1] 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, the term is used sparingly in this report to match the terminology used in the FTA Title VI Circular and other federal guidance.

Metro Transit operates the METRO Green Line LRT, METRO Blue Line LRT, 95 bus routes, and more recently, Metro micro. In the last three years, Metro Transit opened the Gold Line fixed-guideway Bus Rapid Transit (BRT) and the B and E arterial BRT lines. Several more BRT lines and extensions to the Green and Blue lines are in development as Metro Transit seeks to expand its METRO network. Metro Transit also launched Metro micro, an on-demand shared-ride service operating in North Minneapolis, Roseville, Woodbury, Bloomington, and Blaine. 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 contracted fixed routes and such services as Metro Mobility and Transit Link, in addition to providing long-range multimodal transportation planning in the MPO role.

MTS-contracted fixed routes are operated by private transit providers using Metropolitan 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, 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 those unable to use fixed-route transit. For example, 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 (ADA). Services are offered to eligible customers that are physically unable to get to the regular fixed route bus; to navigate regular fixed route bus systems once they are on board, or if they are unable to board and alight from 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 services are infrequent or unavailable. Transit Link is for trips that cannot be completed on regular transit routes alone and may require combining regular routes and Transit Link service. Anyone may reserve a Transit Link ride for any purpose, subject to availability.

Title VI requirements

The Metropolitan Council's Title VI Program uses as its reference the Federal Transit Administration's (FTA) Circular 4702.1B(2012), which outlines Title VI and Environmental Justice compliance procedures for recipients of FTA-administered transit program funds.[2,3]

---

[2] Title VI, (42 U.S.C. § 2000d et seq.) is a federal law. It was enacted as part of the landmark Civil Rights Act of 1964. Title VI law prohibits discrimination, exclusion from participation, and denial of benefits based on race, color, and national origin in programs and activities receiving federal financial assistance.
[3] Federal Transit Administration; Title VI of the Civil Rights Act of 1964 | FTA; Title VI Requirements and Guidelines for Federal Transit Administration Recipients | FTA

Specifically, FTA requires recipients such as the Metropolitan Council to demonstrate the ways in which it complies with Title VI requirements. Therefore, as a direct and primary recipient, the Metropolitan Council must submit its Title VI Program to FTA every three years. The Title VI Program must be approved by Metropolitan Council's board of directors prior to submission to FTA.[4]

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

- Part 1 provides an overview of Title VI and general requirements applicable to all FTA recipients.
- Part 2 focuses on the requirements specific to operators of fixed route transit service. This section is limited to the planning and operations of Metro Transit.
- Part 3 describes the requirements specific to the Metropolitan Council as the designated Metropolitan Planning Organization.

Definitions[5]

Black, Indigenous, People of Color (BIPOC) is the Metropolitan Council's preferred term for the group referred to in FTA Circular 4702.1B as "minority persons," which includes 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 is the Metropolitan Council's preferred term for FTA's "minority transit route," defined as a route that has at least one-third of its total revenue mileage in a census block, census block group, or traffic analysis zone(s) with a percentage BIPOC population that exceeds the percentage 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.

---

[4] FTA Circular 4702.1B: Title 6 Requirements and Guidelines for Federal Transit Administration Recipients ("Definitions," Chap I-2)

[5] The terms and definitions are taken from FTA Circular 4702.1B unless noted otherwise.

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

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

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

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

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

Federal financial assistance refers to:

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

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 routes according to a fixed schedule.

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

Low-income person means a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) 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 (MTP) means the official multimodal transportation plan addressing no less than a 20-year planning horizon that is developed, adopted, and updated by the MPO 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 persons the benefits of, excluding from participation in, or subjecting persons 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 persons residing in that area exceeds the average proportion of low-income persons 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 persons residing in that area exceeds the average proportion of BIPOC persons in the recipient's service area.

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

Public transportation means regular, continuing shared-ride surface transportation services that are open to the general public or open to a segment of the general public 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 fixed route or demand response service.

Recipient means any public or private entity that receives Federal financial assistance from FTA, whether directly from FTA or indirectly through a primary recipient. This term includes

subrecipients, direct recipients, designated recipients, and primary recipients. The term does not include any ultimate beneficiary under any such assistance program.

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

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

Statewide transportation improvement program (STIP) means a statewide prioritized listing/program of transportation projects covering a period of four years that is consistent with the long-range statewide transportation plan, metropolitan transportation plans, and TIPs, and 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 over 200,000, as defined by the U.S. Census Bureau and designated by the Secretary of Transportation, or any additional area where TMA designation is requested by the Governor and the MPO and designated by the Secretary of Transportation.

Part 1: General Requirements

Per federal law, a recipient must comply with DOT's Title VI regulations such as:

- Submission of Title VI assurances by the recipient, also collected from all subrecipients, stating that the recipient will carry out the program in accordance with DOT's Title VI regulations. This requirement is fulfilled annually during the submission of assurances and certifications, and at the time of applications to the FTA for federal financial assistance;
- Provision of further information as requested by the FTA, to investigate complaints of discrimination or to resolve concerns of possible noncompliance with DOT's regulations.

Furthermore, a recipient's Title VI Program, policies, and activities must demonstrate compliance with DOT's Title VI regulations by including information on the following requirements in its Title VI Program document:

- Preparation and submission of a Title VI Program, to the FTA once every three years. The Title VI Program report must contain the following information:
  - A copy of the recipient's compliance with the Title VI notice to the public, and information on protections against discrimination for the general public, including postings on the recipient's website, public areas such as a reception desk, meeting rooms, and even at transit stops and in vehicles;
  - A copy of the recipient's instructions to the public regarding how to file a Title VI discrimination complaint, including a copy of the complaint form;
  - A list of any public transportation-related Title VI investigations, complaints, or lawsuits filed with the recipient since the time of the last submission;
  - A description of the recipient's efforts to promote inclusive public participation, including both comprehensive and targeted measures;
  - A public participation plan that includes the recipient's outreach plan to engage minority and limited English proficiency populations along with a summary of outreach efforts made since the last Title VI Program submission.
  - A copy of the recipient's plan for providing language assistance to persons with limited English proficiency, guided by DOT's LEP;
  - A table depicting the racial breakdown of membership of transit-related, non-elected planning boards, advisory councils, committees, or similar bodies, and a description of efforts made to encourage the participation of minorities on such bodies;
  - A narrative or description of efforts made by the recipient to monitor subrecipient compliance with Title VI along with a schedule of subrecipient TVI submissions;
  - A description of assistance provided to subrecipients for compliance with the Title VI Program, including sharing of information such as data, tables, travel patterns, sample procedures for tracking and reviewing complaints, a sample Title VI Program;
  - A copy of the Title VI equity analysis conducted during the planning stages of construction of a facility such as a vehicle storage facility, a maintenance center or operation center by the recipient.

Title VI notice

As stated in the Title VI Circular, 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.

In compliance with this requirement, 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

    - 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
    - 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

Title VI complaint procedures

To comply with federal regulations for its Title VI Program, the Metropolitan Council has developed procedures for investigating and tracking Title VI complaints filed against it and has made its procedures for filing a complaint available to members of the public. As part of the same compliance, the Metropolitan Council has also developed a Title VI complaint form, and the form and procedure for filing a complaint are available 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 Metropolitan 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 Metropolitan 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 Metropolitan 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 Metropolitan Council's sub-recipients of federal funds, the Metropolitan Council will assume jurisdiction and will investigate and adjudicate the case. Complaints against the Metropolitan 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 additional information needed to process the complaint.

    c. The complainant cannot be located after reasonable attempts

5. Once the Metropolitan 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 Metropolitan Council's records, identifying its basis and alleged harm.

6. In cases where the Metropolitan Council assumes the investigation of the complaint, the Metropolitan 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 Metropolitan Council's written notification of acceptance of the complaint to furnish their response to the allegations.

7. The Metropolitan 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 Metropolitan 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.

As 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

As a general requirement of compliance with Title VI, all recipients must prepare and maintain a list of any public transportation-related Title VI investigations, complaints, or lawsuits alleging discrimination on the basis of race, color, or national origin filed with the recipient since the time of the last submission. This record must also include any active investigations conducted by entities other than FTA, and complaints naming the recipient.[6]

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 its decisions. The various policies and methods used by the Metropolitan Council and Metro Transit to meaningfully and authentically engage BIPOC and limited English proficient (LEP) populations constitute the Metropolitan Council's Public Engagement/Participation Plan, and are summarized below.

[6] 49 CFR Section 21.9(b); FTA Circular 4702.1B, Chapter III-2.

Imagine 2050

The Metropolitan Council created its initial Public Engagement Plan in 2015, as a follow-up to the 2040 regional development guide, Thrive MSP 2040. In February 2025, the Metropolitan Council adopted its most recent regional development guide, Imagine 2050, which encompasses all plans and policies that guide the work of the Metropolitan Council's various Divisions. Community voices shaped the principles of public engagement included in Imagine 2050 by underscoring the following core values of the Metropolitan Council's engagement with communities:

- **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.

In order to prioritize a community-centered framework, the Metropolitan Council's public engagement plan has identified ways to more intentionally embed principles of equity and inclusion into engagement and decision-making processes by recognizing historical patterns of injustice and exclusion, and the impact of unilateral decision-making. As such, Imagine 2050 advances previous engagement policies in several specific ways:

- Centering community voices in regional processes
- Partnering with community as co-creators
- Committing to shared agenda-setting
- Investing in community capacity-building
- Focusing on assets in community and the value community voices bring to regional processes

- Prioritizing overburdened communities in engagement

Imagine 2050 also articulates commitments, policies, actions, and conditions for success for inclusive and accessible community engagement.

Commitments

The following commitments are integral to implementing the Metropolitan Council's community centered engagement approach in its projects, processes, and planning:

- Work to intentionally build trust with communities through community-centered engagement
- Build and sustain relationships, even outside of discrete projects.
- Co-create solutions and define clear roles for partnership and implementation.
- Act with transparency in practice and implementation.
- Dedicate financial resources, such as individual projects and division budgets, that support centering engagement across all our work.
- Measure effectiveness, coordinated with other regional indicators and based on standards defined by communities experiencing inequities.
- Recruit for advisory committees (and other appointments) in a way that results in participants and members who are representative of the region's diverse population.
- Continue to evolve, prioritize, and fund activities that aim to increase meaningful participation among people who do not participate in conventional engagement activities like public meetings, public hearings, and formal public comment processes.

Policies

- The Metropolitan Council will compensate community members for offering their lived experiences and perspectives to inform the Metropolitan Council's decision-making activities.
- Engagement efforts with communities affected by a decision will be intentionally planned with those communities. Engagement activities will meet communities where it is most convenient and effective for them to participate. Engagement activities will occur prior to a decision, to ensure communities have a tangible impact on decisions.
- Metropolitan Council will intentionally partner with communities to plan and execute engagement efforts. Metropolitan Council will prioritize activities with and resources for overburdened communities. Partnership involves shared agenda-setting, shared expectations, shared outcomes, and compensation.
- Engagement activities will reflect the eight principles: equity, respect, transparency, relevance, accountability, collaboration, inclusion, and cultural competence.

Actions

- Continue to advance legislative initiatives to remove the prohibition of compensation for participation in the Metropolitan Council's advisory committees.
- Highlight and implement best practices in government and nonprofit engagement. Create case studies and convene conversations to lift up community examples and shift understandings of community expertise and power. Clarify relationships with and across levels of government to enhance coordination and reduce duplication and fatiguing community.
- Establish specific expectations related to project and program budgeting, to explicitly call out funds and resources for community engagement.
- Identify expectations for co-creation activities and create, in coordination with community experts, a framework for partnership and co-creation.
- Create a tool, in partnership with community experts, to assess and measure effectiveness of community-centered engagement in including voices and addressing equity.
- Invest in and support training and skill-building activities to build capacity for engaging community among the Metropolitan Council and local government staff.
- Engage community voices in validating engagement principles, defining what it means to center voices in processes, and clarifying what transparency and accountability mean in community.
- Support, through technical assistance, local governments to create more community-centered engagement processes. Identify incentives for innovation in community-centered engagement practices.

Community-centered engagement

Imagine 2050 includes an equity model that centralizes a community-centered engagement framework to prioritize engagement with overburdened communities, putting people first and centering community voices in the Metropolitan Council's decision-making activities. This engagement framework embeds engagement guidelines and commitments in our long-term regional policy.

The community-centered engagement framework supports the goal of equity in Imagine 2050 by addressing the conditions of success in the following ways:

- **Leading with race:** Community-centered engagement intentionally prioritizes engagement with overburdened communities.

- **Action-oriented:** Community-centered engagement includes intentional actions to highlight and amplify best practices, to address systemic inequities, and to identify policy changes that either limit or inhibit community voices.

- **Address the historical context:** Community-centered engagement provides space to identify and address historic and ongoing injustice. It also partners effectively with

community in structuring engagement that builds capacity and meaningfully involves community in ways that repair historical harms and combat extractive practices.

- **Share power:** Community-centered engagement prioritizes co-creation with community and intentionally integrates co-created solutions sustainably into decision-making and implementation processes.

In this context, “overburdened communities” include communities of color, tribal, indigenous, immigrant and LEP communities, and people with disabilities.

In addition to this community-centered engagement framework, the Metropolitan Council has administrative policies that detail outreach practices to promote active community involvement in the Metropolitan Council’s decisions. The Metropolitan Council has also outlined public involvement expectations for itself as the Metropolitan Planning Organization. On Sept. 14, 2022, the Metropolitan 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 Metropolitan Council’s Public Engagement Plan, but more specifically identifies the key planning processes of the Metropolitan Council as the designated Metropolitan Planning Organization for the Twin Cities region and how people can be involved in shaping those plans. With the next update, the transportation addendum will reference the Imagine 2050 document.

Engagement for plans and programs

As part of its continued commitment to center community perspectives in its decision-making activities, the Metropolitan Council engaged community in the development of such policy and programming plans as Imagine 2050, the Transportation Policy Plan (which is part of Imagine 2050), the Regional Solicitation process, the 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 that the 2050 planning process would integrate the different planning areas and policy plans into the 2050 regional plan. The engagement planning process is also more integrated to reflect that direction.

From elected officials and city planners to business leaders and community advocates to friends and neighbors, the Metropolitan Council sought feedback on the pieces of Imagine 2050 from a wide range of stakeholders to build a better, brighter future for everyone.

Local experts. The Metropolitan Council created the core vision, values, and goals for Imagine 2050. It consulted with subject matter experts to put the best ideas into action. The Metropolitan Council continues to partner with local experts to promote and implement Imagine 2050 policies, including in the comprehensive plans for the 181 cities and townships in the region:

- Local, regional, and state government officials

- Business leaders
- Nonprofit leaders
- Community advocates

Residents. Imagine 2050 is designed to improve everyday life for Twin Cities residents. To this end, the Metropolitan Council needed to hear what's most important for the people who live and work here. Not only did it encourage feedback on its public policy drafts, it also engaged with community organizations, groups, and residents in unprecedented ways at a wide range of venues:

- Workshops (nearly 500 participants in 26 workshops)
- Artwork on transit and in regional parks
- Interactive displays at community events
- Public forums

Public comment period

Before Imagine 2050 was adopted, the Metropolitan Council hosted a public-comment period for drafts of the guide by inviting the public to share feedback through a wide range of channels – including letters, community gatherings, and an interactive engagement website. More than 500 people and organizations sent more than 1,200 comments. Metropolitan Council compiled every comment into a comprehensive report for policymakers for each policy and system plan chapter. Those public comments helped shape the policies in the guide when Imagine 2050 was adopted in February 2025.

Transportation Policy Plan

The Transportation Policy Plan sets policies and investment guidance for the regional transportation system, based on the goals and objectives in Imagine 2050, the region's development guide. The transportation plan is one of three major systems plans that result from Imagine 2050. It also responds to federal planning guidance provided by the U.S. Department of Transportation and federal law.

Public engagement for the 2050 Transportation Policy Plan (part of Imagine 2050) was also guided by the Transportation Public Participation Plan. As noted above, a public comment period and public hearing for Imagine 2050 generated more than 1,200 comments from 500 people and organizations.

The Metropolitan Council used government and community partners to help spread the word about transportation policy in Imagine 2050, and used social media to both educate and engage the people of the region on critical transportation policy questions. The Metropolitan Council provided translated materials in various languages throughout the creation and review of Imagine 2050, including materials in Hmong, Karen, Somali, and Spanish.

Public comments produced the following themes:

- **Climate**: support for reduction of vehicle miles traveled, greenhouse gases, and electrification objectives
- **General investment**: support for multimodal considerations integrated throughout the plan and a variety of feedback on issues such as disinvestment and environmental justice
- **Transit**: support for transit expansion, requests for additional study on specific corridors, and interest in intercity and regional transit options
- **Safety**: concerns related to providing a safe and secure experience on transit system
- **Highways**: support for investments that serve economic needs and population, support for multimodal coordination with highway investments, and interest in harms and climate impacts
- **Bicycle**: support for system barrier removal and engagement with parks agencies regarding trail system
- **Pedestrian**: support for investments that reduce fatalities and serious injuries

Read the full public comment report for the 2050 Transportation Policy Plan.

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
- Older adult populations

Engagement methods employed included:

- 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

Regional Solicitation

The Regional Solicitation is a competitive process that allocates federal transportation funds to locally initiated projects to meet regional transportation needs. As the designated Metropolitan Planning Organization (MPO), the Metropolitan Council works with the Transportation Advisory Board (TAB) to review and allocate these funds, using an objective, data-driven, and transparent process. Projects selected through the Regional Solicitation process are included in the Transportation Improvement Program. Funds are awarded on a two-year cycle. Specific constituencies include MnDOT, counties, transit providers, and cities in the region. The Metropolitan Council and the Transportation Advisory Board recommended federal funding for locally initiated projects in 2024, following extensive review, evaluation, and the implementation of 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 availability and reasonable anticipation of the use of funds (fiscally constrained). The MPO is required to prepare the TIP as a short-range programming document that complements the long-range transportation plan. The Metropolitan 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 Metropolitan Council and other regional transit providers.

To prioritize public participation and engagement for TIP, the Metropolitan Council used a host of resources such as its website, email lists, and social media channels to promote the public comment period and the pop-up public meetings, including advertising the public comment period in the Minneapolis StarTribune (a newspaper of regional circulation). Metropolitan Council staff also engaged the members of TAB and the Metropolitan 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 Metropolitan 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 buses
- 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 Metropolitan 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 Metropolitan 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 offer public outreach activities customized 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.

Community outreach events

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 provide 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 Metropolitan Council outreach staff interact multiple times per week with the contractor's outreach liaison.

Green Line Extension project outreach staff have hosted or attended more than 300 public meetings, corridor tours, 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 construction, project office staff have sponsored periodic walking tours of the corridor to demonstrate progress and provide access to station areas and community connections.

LEP populations engagement and outreach

Intentional engagement with LEP populations has included the following steps:

- 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

Furthermore, 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. 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 used to communicate is 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.

The website, 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 collaborate to produce news releases and news advisories for distribution to media organizations in the Twin Cities region such as to 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 X, Instagram, and the Metropolitan Council's Bluesky account and 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 2025, the project has nearly 22,000 email subscribers, 1,500 followers on X, and more than 1,000 followers on Instagram. More information about the project can be found online at www.GreenLineExt.org.

METRO Blue Line Extension

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. In 2024, the alignment through North Loop and north Minneapolis was updated through municipal consent to operate via 10th Ave, Washington, and Broadway/21st Ave. 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 canvasing
- 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 has contracted 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. Table 1 lists these organizations.

Table 1. Community and Culturally Based Organizations Contracted for Blue Line Extension Outreach and Engagement

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

The website, BlueLineExt.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 Blue 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 X, Instagram, and Facebook to promote events and announce project milestones and uses a push email utility to send out meeting notices, newsletters, and press releases. In 2025, the project has nearly 17,000 email subscribers, 700 followers on X, more than 600 followers on Facebook, and nearly 500 followers on Instagram.

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

METRO Gold Line

The METRO Gold Line BRT project opened in March 2025. It is a 10-mile BRT transit line in Ramsey and Washington counties in the eastern part of the Twin Cities metropolitan area. The line travels between downtown Saint Paul and Woodbury, serving the cities of Saint Paul, Maplewood, Landfall, Oakdale, and Woodbury. The route runs along local roadways generally north of and near Interstate 94 primarily within bus-only lanes (dedicated guideway) and serve 21 stations. The stations have enhanced features like existing METRO service. 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. Additionally, Metro Transit plans to extend the METRO Gold Line west to downtown Minneapolis with service expected to begin in 2027.More information can be found on the project's website at https://www.metrotransit.org/gold-line-extension.

Public engagement for the Gold Line project focused on engaging corridor residents, businesses, organizations, and transit riders throughout the project planning, design, and construction processes to solicit their input and address their needs and concerns. The Metropolitan Council made a concerted effort to engage with traditionally underrepresented communities in transit planning processes: BIPOC, low-income, and populations with limited English proficiency, people with disabilities and other historically marginalized groups. This engagement plan identified key business and community groups along the corridor and detailed strategies to maximize opportunities for engagement and communication the phases of the project. Project staff and project partners employed multiple communication and public engagement strategies. The project's community outreach and engagement lead staff person prioritized strategies for implementation. Some of the public involvement and communication methods used throughout the project included:

- **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

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

- 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.

METRO Purple Line

The METRO Purple Line BRT project is a proposed bus rapid transit (BRT) line in Ramsey County in the northeastern part of the Twin Cities Metropolitan Area. As of October 2025, the proposed line will travel between downtown Saint Paul and Maplewood. Current plans indicate the Purple Line will feature electric buses operating primarily in dedicated transit lanes mostly following Robert Street and Phalen Boulevard from downtown Saint Paul, and along White Bear Avenue north into Maplewood. 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. More information can be found on the project's website at metrotransit.org/purple-line.

To center the Metropolitan Council's community-centered engagement model in planning this project, 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. A concerted effort will also be made to engage with 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.

Engagement work will include 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.

METRO D Line

The METRO D Line is the region's third planned arterial BRT line, which opened for service in December 2022. The D Line substantially replaced Route 5, running primarily on Chicago and Emerson/Fremont avenues between Brooklyn Center, Minneapolis, Richfield, and Bloomington. BRT brings better amenities, faster service, and a more comfortable ride to this corridor.

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 arterial BRT line, which opened for service in June 2025. The B Line substantially replaced Route 21, running primarily on Lake Street and Marshall Avenue between Saint Paul and south Minneapolis. BRT brings 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. The Metropolitan Council identified the following engagement methods to involve the community in the design of the B Line:

- 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

METRO E Line

The METRO E Line is the region's fifth arterial BRT line, opened in December 2025. The E Line substantially replaced Route 6, running primarily in the Hennepin Avenue corridor. Like on the A, B, C, and D lines, BRT brings better amenities, faster service, and a more comfortable ride to this corridor.

In January 2020 the E Line route was adopted by the Metropolitan Council. Since then, engagement has supported development of a corridor plan, receiving comments on the

recommended plan, and construction. 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. Following the Metropolitan Council's approval of the METRO F Line Final Corridor Plan in August 2023, the engineering phase of the F Line project began. Metro Transit is collaborating with the Minnesota Department of Transportation (MnDOT) during this phase to ensure the compatibility of future transit and roadway investments along the F Line route.

The coordinated Central Avenue/METRO F Line projects will provide safer and more accessible facilities for all travelers, focusing on people walking, rolling, bicycling, and riding transit.

Metro Transit and MnDOT are working together to develop the design for Central Avenue and F Line along with other improvements, and they will seek public input as the projects advance.

The F Line is currently in the engineering phase.

To reach people a variety of methods were used including:

- Project website (www.metrotransit.org/f-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

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.

The G Line is currently in the planning/design phase. A final corridor plan was approved by the Metropolitan Council in March 2025. Engagement will support involvement in the engineering and construction phases in the coming years. www.metrotransit.org/g-line-project

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. The Metro H Line is currently in the planning phase and that phase will continue through 2026, supported with engagement. www.metrotransit.org/h-line-project

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 http://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 22 (2022)

Metro Transit removed about 130 bus stops and added or relocated 10 others. Two low-ridership branches were eliminated, which shifted service to more productive portions of the route. Finally, five new shelters and 20 ADA pads were installed along the route to improve accessibility and customer convenience waiting for the bus.

Route 17 (2023)

Metro Transit removed about 67 bus stops and relocated four others. The terminal in Northeast Minneapolis was extended to Central Ave via Lowry Ave to provide better access to jobs, retail, and other destinations along Central Ave. Service along a low ridership branch in Saint Louis Park was reduced to reverse-commute only, which allowed us to shift trips to Minnetonka Blvd where demand is higher. Finally, 17 ADA pads were installed along the route to improve accessibility.

Route 4 (2024)

Metro Transit removed about 62 bus stops and relocated three others. New bus lanes were added along the Hennepin/Lyndale corridor south of downtown, and along Hennepin/1st Ave NE in Northeast Minneapolis. In addition, transit signal priority (TSP) was added to 10-12 signals along Lyndale Ave S. Finally, about a dozen ADA pads were installed along the route to improve accessibility.

Route 7 (2025)

Metro Transit removed about 48 bus stops and relocated three others. The route alignment was simplified, with buses traveling through downtown Minneapolis on Washington Ave. As a result, service on 3rd and 4th streets in downtown, and along 1st St North in the North Loop was eliminated. Similarly, routing in the Seward Neighborhood was streamlined to travel on to

26th Ave S, eliminating several extra turns. Frequency on Saturday and Sunday was improved and trips run later in the evening. Finally, ADA pads were installed at around a dozen locations.

Route 61 (2025)

Metro Transit removed about 80 bus stops and relocated six others. A low ridership branch was eliminated, saving 6-8 minutes for riders traveling to downtown. Saturday service was increased by 300 percent, while Metro Transit added new Sunday service for the first time. Finally, around 15 ADA pads and three shelters were installed along the route to improve accessibility and customer convenience waiting for the bus.

Route 14 (ongoing, planned 2026)

This Better Bus Route project will implement changes developed through the Network Now planning process. Route 14 currently has several branches and route deviations that complicate service, so the recommendation is to simplify the alignment by shifting existing trips along Douglas Dr and Golden Valley Rd to a new connector route. Changes to bus stops will be determined after public engagement in early 2026.

Network Now

Network Now (www.metrotransit.org/network-now) is a vision for transit service that best meets the needs of our region through 2027. This framework guides improvements to grow ridership, enhance mobility, and meet travel needs. The framework outlined in this report represents the region's top priorities for transit as captured in more than 8,000 comments over multiple years, coupled with policy guidance, and technical evaluation. Changes made to this report from the draft concept were guided by community feedback. Network Now responds to the priorities outlined in Forward, Metro Transit's strategic plan, by delivering on service goals.

When fully implemented, the Network Now framework will:

- Expand transit service by more than 40% to help attract more riders
- Improve access by providing new bus routes and Metro micro service
- Modify commuter and express service to meet today's travel patterns
- Reduce greenhouse gas emissions by encouraging transit use

Network Now is being implemented through quarterly Metro Transit service changes.

Metro Transit received nearly 1,600 comments during the Network Now Draft Concept Framework. Comments were received via electronic or paper comment form, email, phone calls, in-person verbal comments or statements at Metro Transit hosted events as well as community events, and onboard intercept conversations on bus/train and at Transit Centers. Overall Metro Transit accepted comments in whichever form was easiest for people and has treated all forms of comments equally no matter the venue that they were submitted.

Read the Network Now engagement summary.

Strategies used to reach customers and community included:

- Community meetings
- Pop-up meetings and briefings
- A transit on-board intercept survey
- Rider alerts
- Interior transit cards
- Newsletter
- Partner outreach
- Materials translated into Hmong, Karen, Lao, Somali, Spanish, and Vietnamese

Ongoing outreach and presence in communities

Metro Transit engages in extensive public participation during its day-to-day operations, and 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.

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

In compliance with federal regulations, the Metropolitan Council prepares and maintains a formal Language Assistance Plan (Attachment E) for providing language assistance to populations that are Limited English Proficient (LEP), based on LEP guidance from the U.S. Department of Transportation. The Metropolitan Council's Language Assistance Plan demonstrates the Metropolitan Council's commitment to provide meaningful access to all individuals accessing the Metropolitan Council's services, including Metro Transit, Metro Mobility, and Transit Link. The federal guidance notes that for effective implementation, plans must 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, also found in the Metropolitan Council's Language Assistance Plan.

Identifying populations with Limited English Proficiency (LEP)

A four-factor analysis was completed to identify LEP populations who need language assistance. Based on U.S. Census Bureau 2019-2023 American Community Survey (ACS) five-year estimates, the Metro Transit service area is home to 2,079,039 people ages 5 and older, 7.3% (151,582) of whom are LEP persons. Spanish is the most frequent language spoken in the Metro Transit service area other than English, with an LEP population comprising 2.2% (45,025) of the total service are population.

Table 2 lists LEP populations within Metro Transit's service area according to the 12 foreign language classifications contained in the 2019-2023 ACS at the tract level. No languages have populations with limited English proficiency that exceed 5% of the total population in the service area. Nine of the 12 language classifications have at least 1,000 LEP persons.

Table 2. LEP Speakers in the Metro Transit Service Area

Language	Number of LEP Speakers	% of Total LEP	% of Total Population Ages 5+
Spanish	45,025	29.7%	2.2%
Other Asian and Pacific Island languages	40,905	27.0%	2.0%
Other or unspecified languages	33,763	22.3%	1.6%
Vietnamese	7,482	4.9%	0.4%
Other Indo-European languages	5,479	3.6%	0.3%
Chinese (incl. Mandarin, Cantonese)	4,974	3.3%	0.2%
Russian, Polish, and other Slavic languages	4,189	2.8%	0.2%
French (incl. Haitian, Cajun)	4,002	2.6%	0.2%
Arabic	3,145	2.1%	0.2%
Korean	919	0.6%	0.0%
Tagalog (incl. Filipino)	905	0.6%	0.0%
German (incl. other West Germanic languages)	795	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 Metropolitan Council are used to supplement census data to gauge the needs of LEP populations more precisely. Metro Transit call center data, along with census data, support the conclusion that Metro Transit interacts most commonly with LEP populations who speak **Spanish, Hmong, Karen, Somali, Spanish, and Vietnamese.**

Language assistance measures

Metro Transit, Metro Mobility, and contractors who provide transit service on behalf of the Metropolitan 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 180 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.

- Direct response interpretation services for Limited English Proficiency customers wishing to speak to Metro Transit's transit information or customer relations representatives through the main information number. 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 service supports Hmong, Karen, Russian, Somali, Spanish, and Vietnamese.

- Coordinating with community partners to provide translations and interpreters for community events and cohort-based engagement partnerships. For formal public meetings and public hearings, notices include translated text blocks to encourage participants to access translation and interpretation services, provided by the Metropolitan Council.

- 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 Hmong, Karen, Somali, Spanish, and Vietnamese

- Translation of documents vital to the Metropolitan Council transit services available in Hmong, Karen, Somali, Spanish, and Vietnamese

In early 2026, the Metropolitan Council will review documents vital to accessing transit services in the region, including how-to-ride resources, information about fares, information about reporting discrimination and violations of Title II and Title VI, and other service-related information for regular route transit, paratransit (Metro Mobility), dial-a-ride service (Transit Link), and waiver-supported human services transit (Metro Move). Metro Transit will update materials and update translations of these materials into Hmong, Karen, Somali, Spanish, and Vietnamese.

Monitoring and updating the Language Assistance Plan

The Metropolitan 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 Metropolitan 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

As a requirement of its Title VI Program, the Metropolitan Council complies with the guidance in the FTA Circular on minority representation on planning and advisory bodies by providing the racial distribution of the members of its advisory committees, planning boards or advisory councils, and on encouraging participation of minorities on such committees or councils.[7,8]

Metropolitan Council members serve on standing committees that meet regularly and make recommendations to the full Metropolitan Council. The public is encouraged to attend the Metropolitan Council and committee meetings and hearings and express their points of view on matters 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 Metropolitan 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 3. The demographic breakdown of the seven-county metropolitan area is also shown for comparison.

[7] FTA Circular 4702.1B, chap. III-10.
[8] Title 49 CFR Section 21.5(b)(1)(vii)

Table 3. Committee and Advisory Board Demographics

Committee (Number of Members)	White/ Caucasian	Hispanic or Latino	Black/African American	Asian American/ Pacific Islander	American Indian	Other/Two or More Races**	No Response
Seven-County Metropolitan Area*	68.8%	7.2%	10.3%	8.2%	0.5%	5%	-
Metropolitan Council (17)	41%	12%	29%	12%	6%	0%	0%
Land Use Advisory Committee (18)	61%	0%	11%	6%	0%	6%	17%
Equity Advisory Committee (19)	5%	11%	74%	5%	0%	0%	0%
Livable Communities Advisory Committee (14)	64%	7%	14%	21%	7%	14%	0%
Metro Parks & Open Space Commission (8)	63%	25%	13%	0%	0%	0%	0%
Transportation Advisory Board (34)	88%	0%	3%	9%	3%	3%	0%
Transportation Accessibility Advisory Committee (13)	46%	8%	0%	0%	0%	0%	46%
Audit Committee (8)	50%	0%	38%	13%	0%	0%	0%
Investment Review Advisory Committee (2)	100%	0%	0%	0%	0%	0%	0%

* U.S. Census Bureau 2020 Decennial Census.
* *Individual(s) specifying multiple races (e.g. “White and Black,” “Asian and Hawaiian”) are counted in all applicable columns. Summing percentages of any given committee may therefore exceed 100%.

Encouraging BIPOC community participation

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

- The Metropolitan Council’s website and extensive email network, which includes nearly 140,000 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 and provision of assistance

In compliance with federal requirements on subrecipient monitoring,

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. Additionally, as also required by Title VI compliance, as a primary recipient of federal financial funds, the Metropolitan Council extends federal financial assistance to other recipients, and such other recipients shall also submit compliance reports to the Metropolitan Council as may be necessary to enable it to carry out its obligations under this part. These subrecipients (providers of transit services and/or recipients of federal funding via the Metropolitan Council) include:

- Minnesota Valley Transit Authority (MVTA)
- Maple Grove Transit
- SouthWest Transit
- Plymouth Metrolink
- University of Minnesota
- Anoka TMO
- City of Maple Grove
- Move Minnesota
- HourCar
- City of Eden Prairie
- Ramsey County
- City of St. Louis Park
- City of Plymouth
- Bicycle Alliance 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 Metropolitan 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 Metropolitan Council's Title VI Administrator, Shirin Edwin.

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

The Metropolitan Council recently held its triennial review in which there were no findings related to Title VI.

If a Metropolitan Council program or subrecipient is found to be out of compliance or is believed to be out of compliance with Title VI, the Metropolitan 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, two new facilities - a facilities maintenance shop (345 Industrial Blvd, Minneapolis) and a materials management warehouse (755 Industrial Blvd, Minneapolis) – have been sited. The facilities maintenance shop is an operations center for Public Facilities Maintenance and provides for storage of vehicles, materials, equipment, and tools. Public Facilities Maintenance is responsible for cleaning and repair of the facilities where customers board and alight transit including transit stations, transit centers, Park & Rides, and bus shelters. The materials management warehouse centralizes materials and parts storage, with primary functions of storage and dock loading/unloading.

Facility siting equity analyses were completed in accordance with Metro Transit's Title VI policy. The quantitative analysis for each site involved a comparison of demographics within a quarter mile of all sites considered for each facility and demographics within a comparison area containing all parcels around the Twin Cities region that Metropolitan the minimum criteria for site selection. The quantitative analysis determined that neither selected site is expected to result in any disparate impacts to BIPOC populations. The quantitative analysis found a possibility the facilities maintenance shop at 345 Industrial Blvd may have a disproportionate burden on the low-income population in the vicinity. However, alternative sites considered for selection showed similar or more likely potential for disproportionate burden. Further qualitative analysis of land use surrounding 345 Industrial Blvd showed that the area is fully industrial, whereas alternative sites were located in areas with a mix of land uses.

Part 2: Fixed-Route Transit Provider Requirements

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

Demographic analysis

Metro Transit uses demographic data to assess equity in the distribution of services, facilities, and amenities in relation to BIPOC and low-income populations in its service area.[9] 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. Figure 2 shows the service area as well as the census block groups that have BIPOC populations greater than 34.6 percent, the BIPOC population percentage of the whole service area. Similarly, Figure 3 shows the census block groups that have low-income populations greater than 20.3 percent, the low-income population percentage of the whole service area. For both, the census block groups that have higher than average BIPOC and low-income populations tend to be located where there is existing Metro Transit service.

Table 4 summarizes the Metro Transit service area population and its proximity to service, including population within a half mile of transitway stations and a quarter mile of bus service. Metro Transit's service area has a total population of 2,219,063 based on 2019-2023 ACS five-year estimates. A greater percentage of BIPOC and low-income populations live near bus and

---

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

transitway service than non-BIPOC and non-low-income populations in Metro Transit's service area.

Figure 1: Metro Transit Service

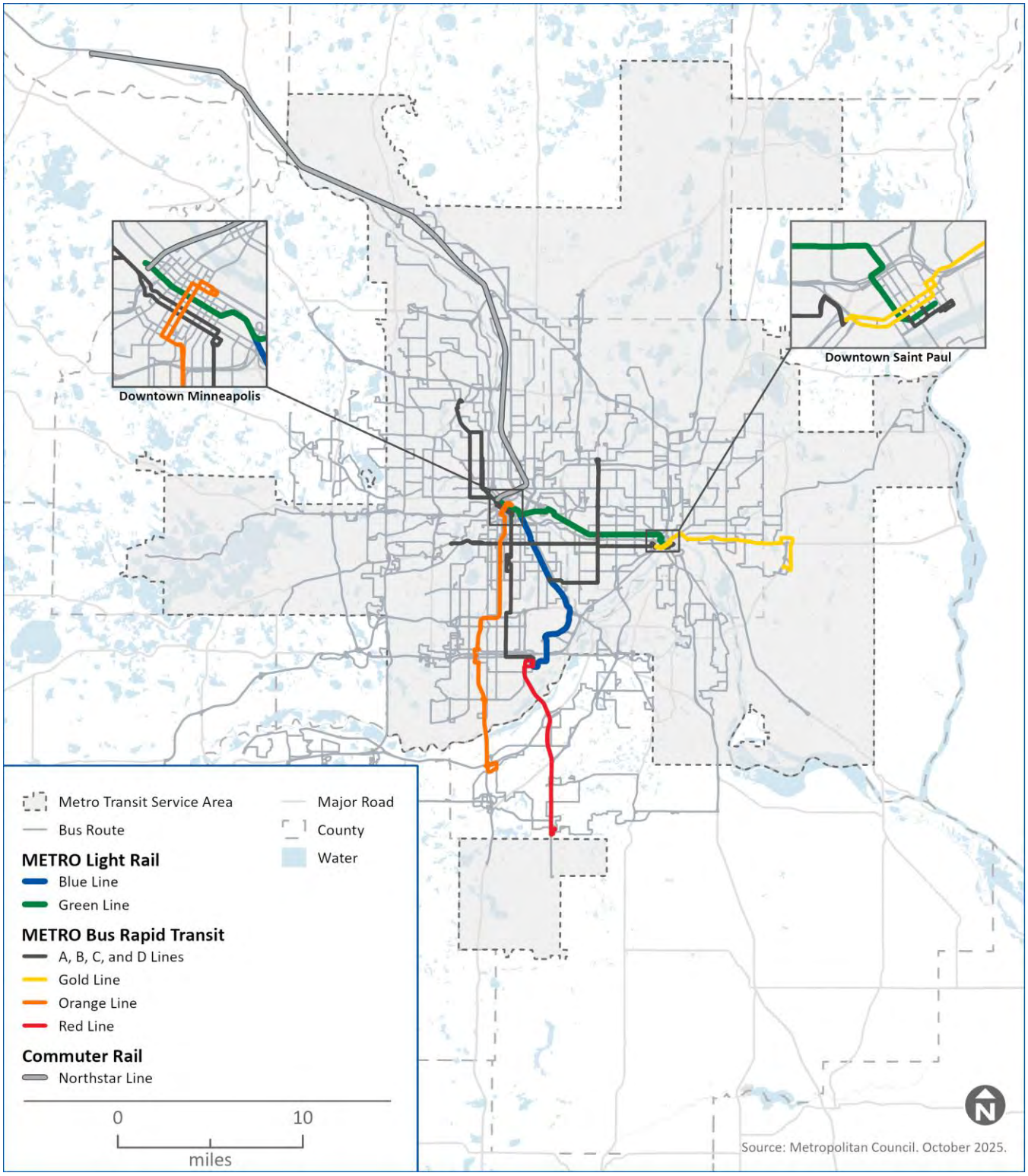


Figure 2: Metro Transit Service and Percent BIPOC Population

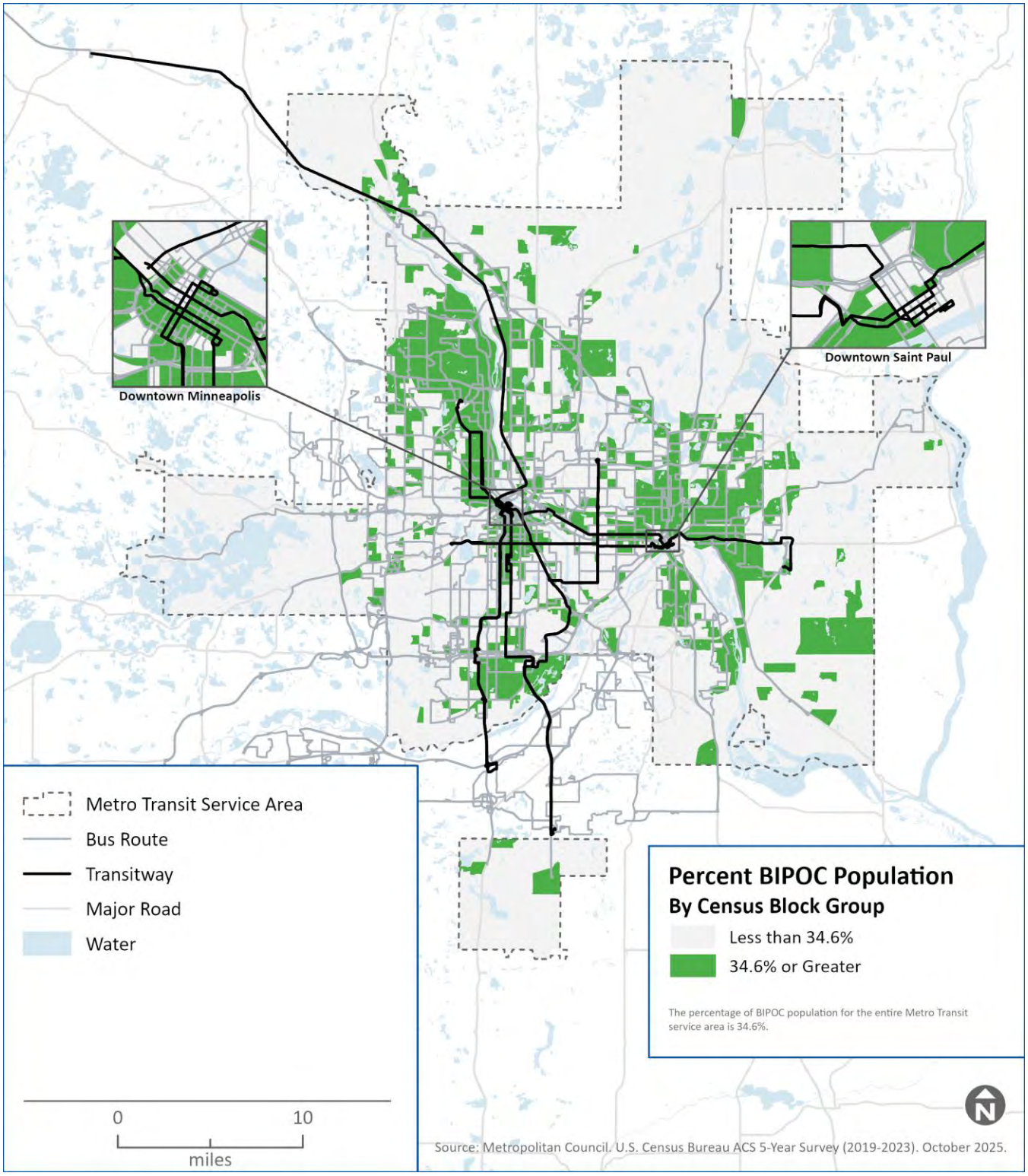


Figure 3: Metro Transit Service and Percent Low-Income Population

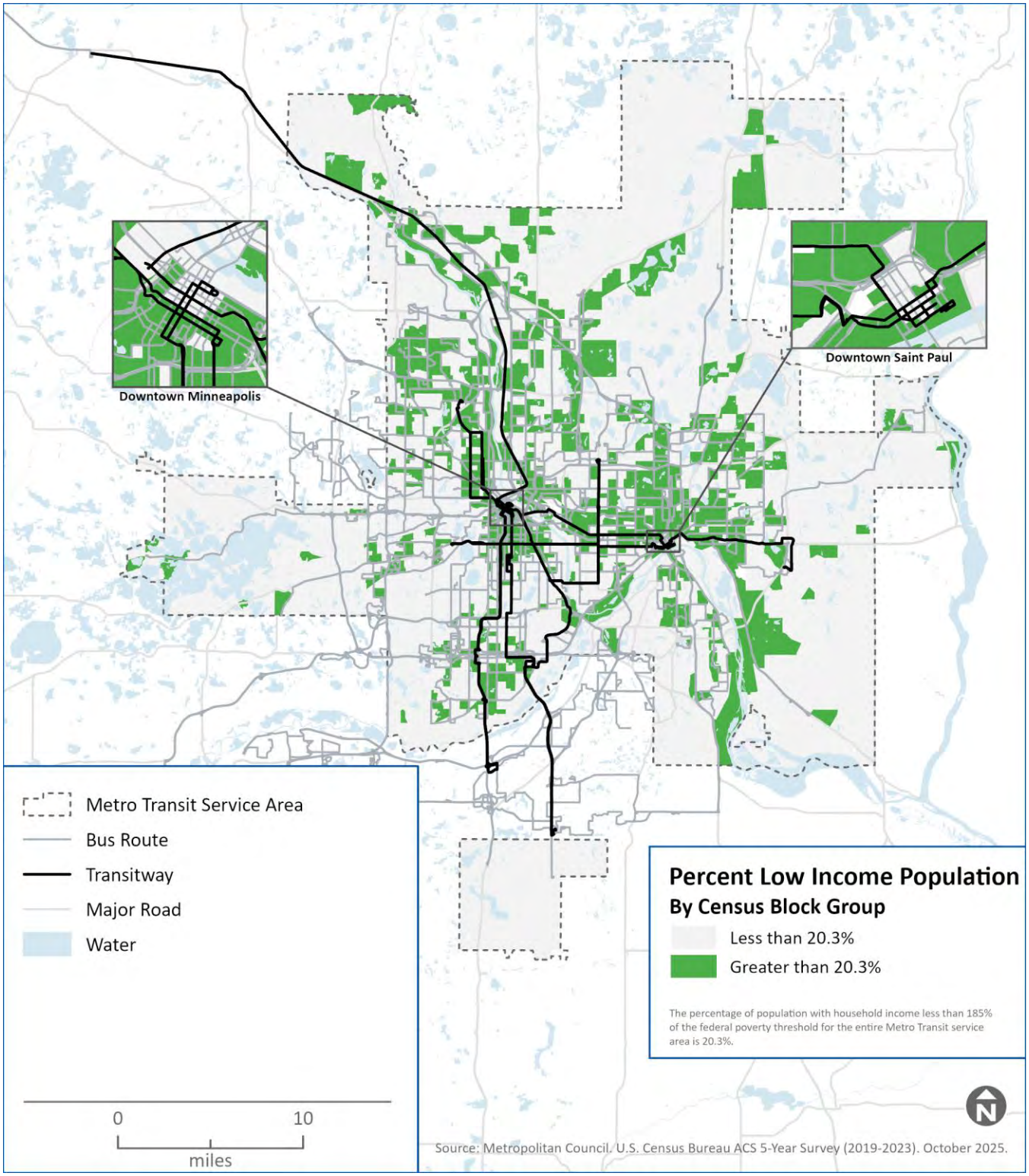


Table 4: Proximity to Metro Transit Service

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	2,219,063	49.4%	32.6%
BIPOC Population	767,752	60.2%	42.6%
Non-BIPOC Population	1,451,311	43.7%	27.3%
Low-Income Population	452,359	64.3%	46.8%
Non-Low-Income Population	1,766,704	45.6%	29.0%

*LRT, BRT, Northstar Commuter Rail
Source: 2019-2023 American Community Survey 5-Year Estimates, using areal interpolation and the selection of census block groups 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 & Rides, and operations and maintenance and administration support facilities.

Park & Ride facilities are surface lots and structured ramps, mostly in suburban communities, served by commuter and express bus, highway or dedicated bus rapid transit, or rail. Park & Rides are amenities co-located with other types of customer facilities like bus stops, stations, or transit centers. Park & Rides are important tools for creating locations with the customer density required to provide cost-effective transit service in suburban and rural areas.

Park & Ride facilities are distributed across the entire service area with many located in census block groups that have higher than average BIPOC and low-income populations.

Existing transit centers are predominantly located in block groups with above-average percentages of BIPOC and low-income populations. Transit centers are customer facilities that provide comfortable and convenient locations for customers to transfer between routes where two or more transit routes connect. They are typically located off-street at major activity centers and have multiple bus stops with bus service timed for easy transfers. Transit centers provide customers with shelter, transit information, and other features to enhance their experience. Buses also frequently lay over and bus operators may take breaks at transit centers. Having break facilities directly at layover locations is important for scheduling and on-time performance.

Support facilities are where the necessary behind-the-scenes work occurs that is essential to maintaining reliable, high-quality service throughout the region. Facilities in this category include bus garages, maintenance buildings, rail support facilities, operations centers, communications control centers, bus layover facilities, and others. Metro Transit’s bus and rail operations and maintenance (O.M.) support facilities are located closer to the core of its service area, proximal to concentrations of transit service. Many of the O.M. support facilities

are within census block groups that have higher than average percentages of BIPOC and low-income populations.

Figure 4: Existing Facilities and BIPOC Population

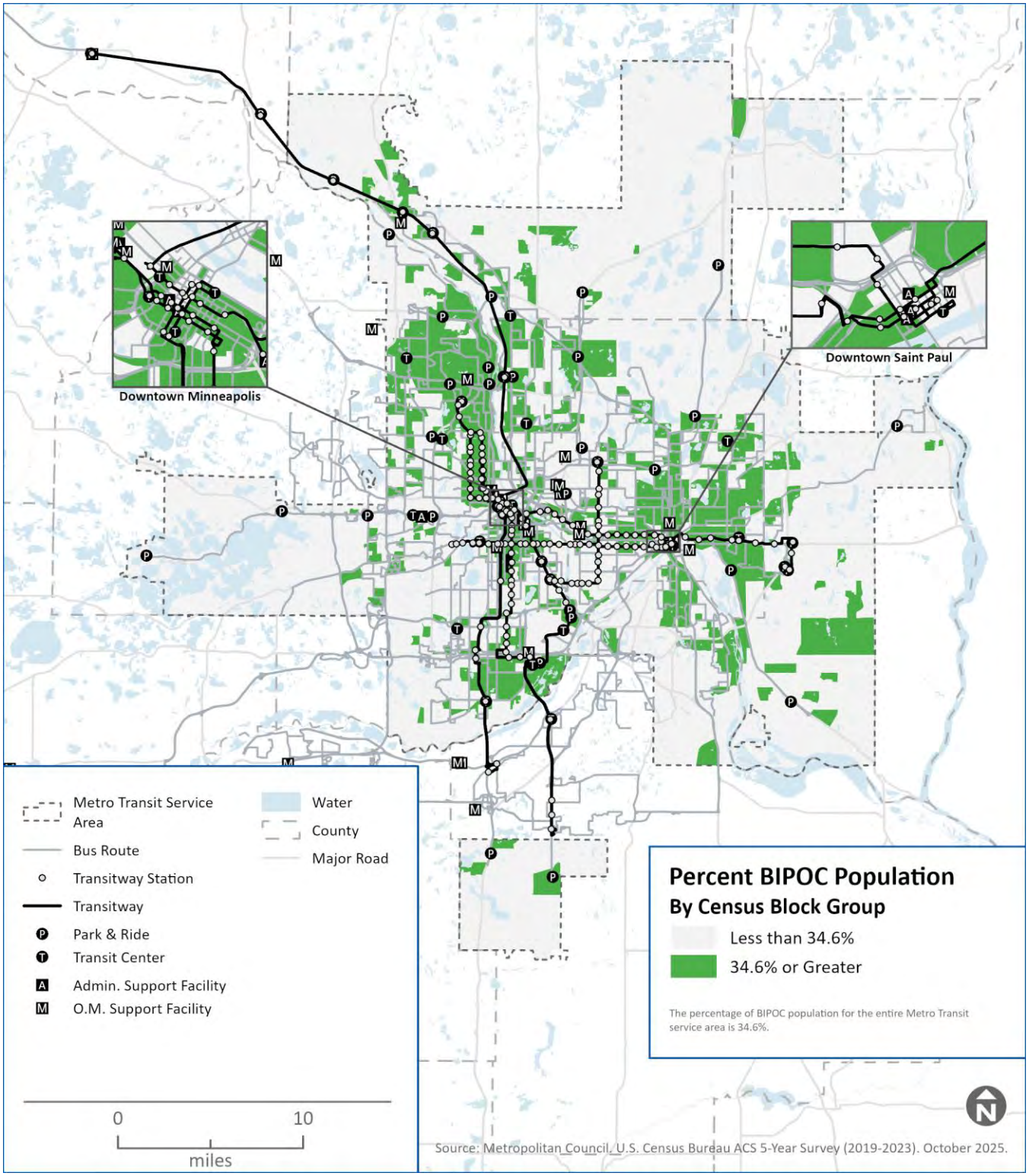
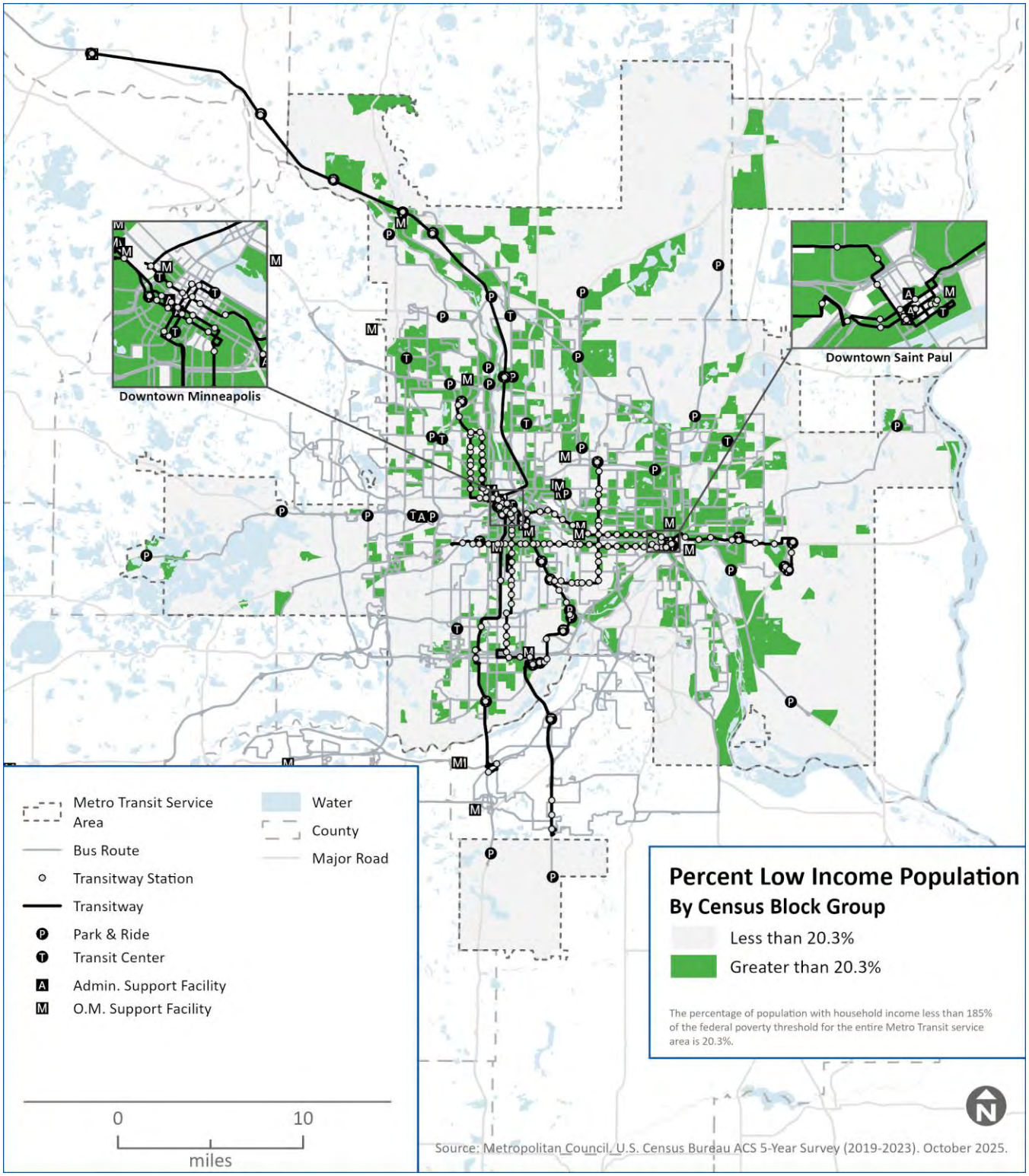


Figure 5: Existing Facilities and Low-Income Population



Recently completed and planned facilities

Table 5 lists transit facilities that were recently added, replaced, improved, or 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 located in, or planned for, areas with above-average percentages of BIPOC and low-income populations.

Table 5: Recently Completed and Planned Transit Facility Improvements

Status	Project Name	Project Description
Complete	METRO D Line	Rapid bus corridor between Brooklyn Center Transit Center and Mall of America
Complete	METRO B Line	Rapid bus corridor between West Lake Street, Minneapolis with downtown Saint Paul
Complete	METRO Gold Line	BRT corridor between Woodbury and downtown Saint Paul
Complete	Downtown Minneapolis Hennepin Avenue bus customer facility improvements	Construction of new shelters with heat/light, real-time information, and other amenities on Hennepin Ave
Complete	Blue Line Operations & Maintenance Expansion	New Rail Control Center; expansion of maintenance bays
Complete	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
Complete	North Loop Garage	new bus garage in Minneapolis
Complete	Martin J. Ruter garage repurposing	Repurpose bus garage to maintenance and instruction functions
Complete	Northtown Transit Center relocation	Relocation of existing transit center, enhanced customer waiting areas
Complete	Northstar equipment storage building	Addition to existing Northstar Vehicle Maintenance facility for equipment storage
Ongoing	METRO E Line	Rapid bus corridor between Green Line's Westgate Station and Southdale Transit Center
Ongoing	METRO G Line	Rapid bus on Rice/Robert corridor
Ongoing	METRO F Line	Rapid bus on Central Avenue corridor
Ongoing	Better Bus Stops Program	Systemwide bus shelter and ADA improvements
Ongoing	Northstar transition	Convert rail to bus facilities on the Northstar corridor operating between Big Lake and Minneapolis

Status	Project Name	Project Description
Ongoing	METRO Green Line Extension	New light rail corridor between downtown Minneapolis and Eden Prairie
Ongoing	Lake St/Midtown Station renovation	Renovate and improve existing METRO Blue Line Lake St/Midtown Station LRT station
Ongoing	Renew the Blue 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); Real Time Signage upgrades; Station renewals
Ongoing	Franklin Station renovation	Renovate and improve existing METRO Blue Line Franklin LRT Station
Ongoing	Central Station improvements	Improve Green Line - Central Station vertical circulation building with refurbishment, mural, door upgrades
Ongoing	Blue Line Extension	New light rail corridor between downtown Minneapolis and Brooklyn Park
Ongoing	Pavement improvements	Repaving of surface lots at park & ride lots
Ongoing	Heywood Office remodel	Renovation of existing Heywood office building
Ongoing	Materials Management Warehouse	Additional support facility to centralize materials and parts storage
Ongoing	Public Facilities Maintenance Shop	Adds a second Public Facilities Maintenance shop at 345 Industrial Blvd. NE in Minneapolis.
Ongoing	Saint Paul OMF LRV storage barn	New facility to store LRVs on site immediately east of existing Saint Paul OMF facility
Ongoing	Mobility hub improvements	Strengthen connections between shared mobility and transit at Sun Ray Transit Center, Brooklyn Park Transit Center and Maplewood Mall Transit Center
Ongoing	Rosedale Transit Center improvement	Enhance customer boarding areas, including ADA improvements
Planned	METRO Purple Line	BRT corridor between downtown Saint Paul and Maplewood Mall Transit Center
Planned	METRO Gold Line extension	BRT corridor between downtown Saint Paul and downtown Minneapolis
Planned	METRO H Line	Rapid bus corridor between downtown Minneapolis and Sun Ray Transit Center
Planned	Highway 36 & County Road E Park & Ride improvements	Improve bus circulation and expand bus gates within the existing site
Planned	38th St Station Transit Center renovation	Renovation of bus transit center at METRO Blue Line 38th St Station to improve bus

Status	Project Name	Project Description
		operations, pedestrian access, micromobility facilities and bicycle infrastructure
Planned	Sun Ray Transit Center renovation	Renovation of existing Sun Ray Transit Center
Planned	Uptown Transit Station renovation	Renovate transit center, right size waiting area, refurbish operator facility
Planned	46th Street Transit Center refurbishment	Enhance customer boarding areas, including ADA improvements
Planned	Secure Bike Parking Pilot	Replace aged bike lockers with new technology and locker solution for secure bike parking at customer facilities

Figure 6: Planned and Recently Completed Facilities with BIPOC Population

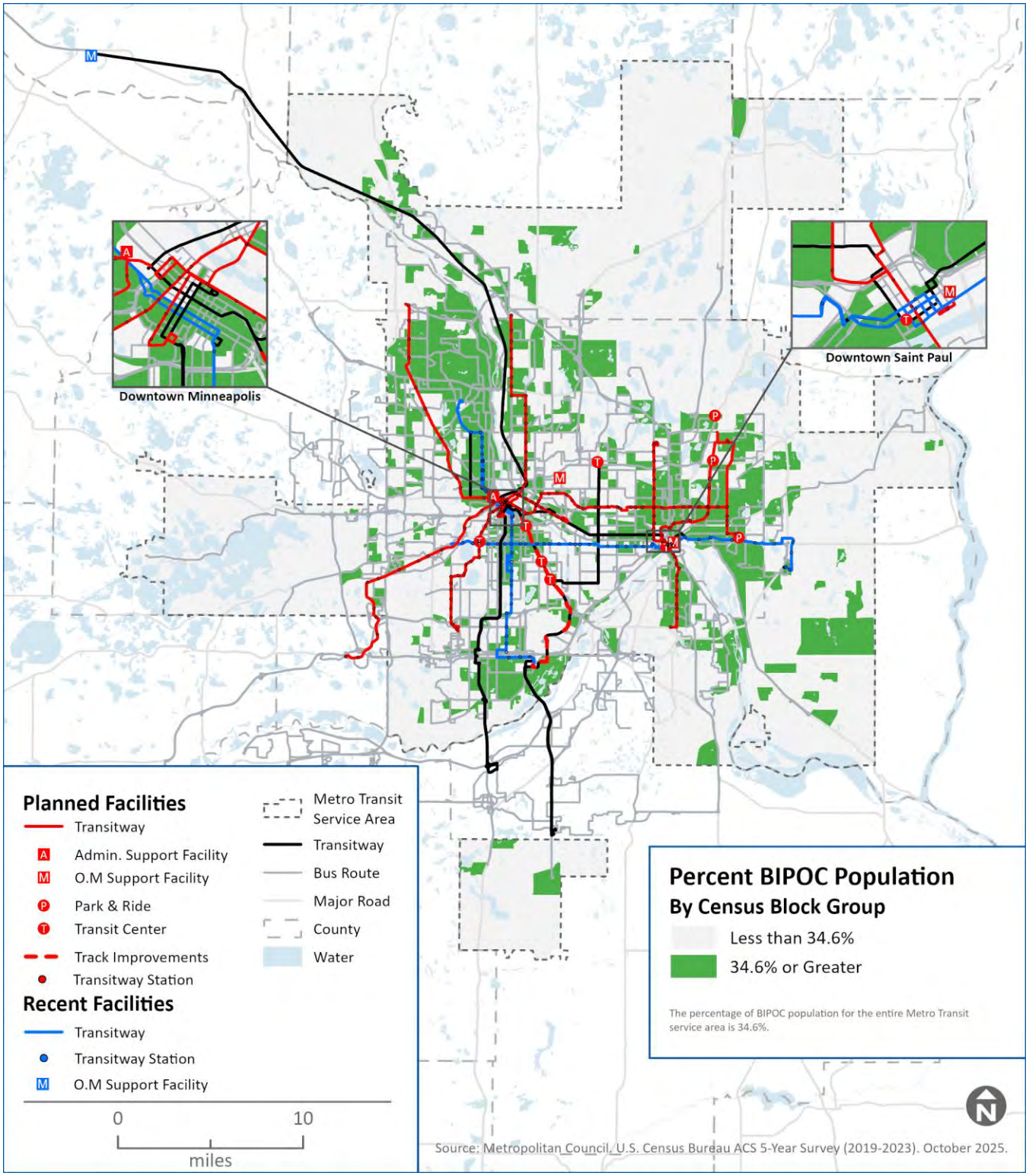
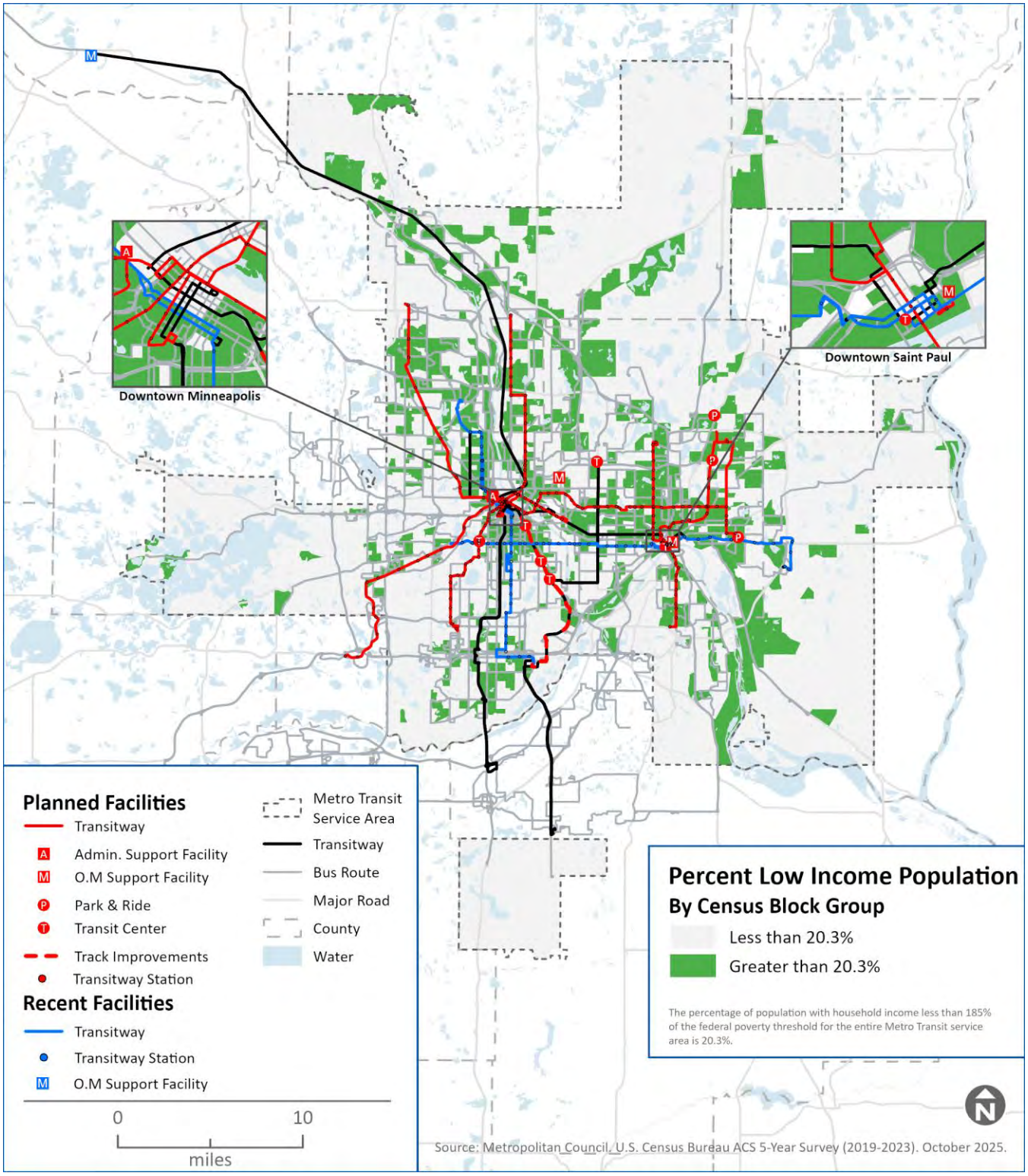


Figure 7. Planned and Recently Completed Facilities with Low-Income Population



Demographic profiles of ridership and travel patterns

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

"Fixed route providers of public transportation […] shall collect information on the race, color, national origin, English proficiency, language spoken at home, household income and travel patterns of their riders using customer surveys. Transit providers shall use this information to develop a demographic profile comparing minority [BIPOC] riders and non-minority [non-BIPOC] riders, and trips taken by minority [BIPOC] riders and non-minority [non-BIPOC] riders. Demographic information shall also be collected on fare usage by fare type amongst minority [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 (TBI) Transit On-Board Survey. 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, and general feedback. Its most recent iteration in 2024 collected 2,733 responses across Metro Transit's services. However, unlike the more robust TBI survey, the results from the Metro Transit Customer Survey are believed to be subject to significant response biases, and they are not used for Title VI purposes.

The Metropolitan Council's Travel Behavior Inventory (TBI) Transit On-Board Survey is the preferred data source for use in the Title VI Program and applicable equity analyses. Conducted every five years, the On-Board Survey is a survey of travel on fixed-route service in the seven-county region that Metropolitan Council uses to inform travel forecasting and funding decisions. The Metropolitan Council and regional transit providers use this data to update the regional travel-demand forecasting models and understand transit ridership.

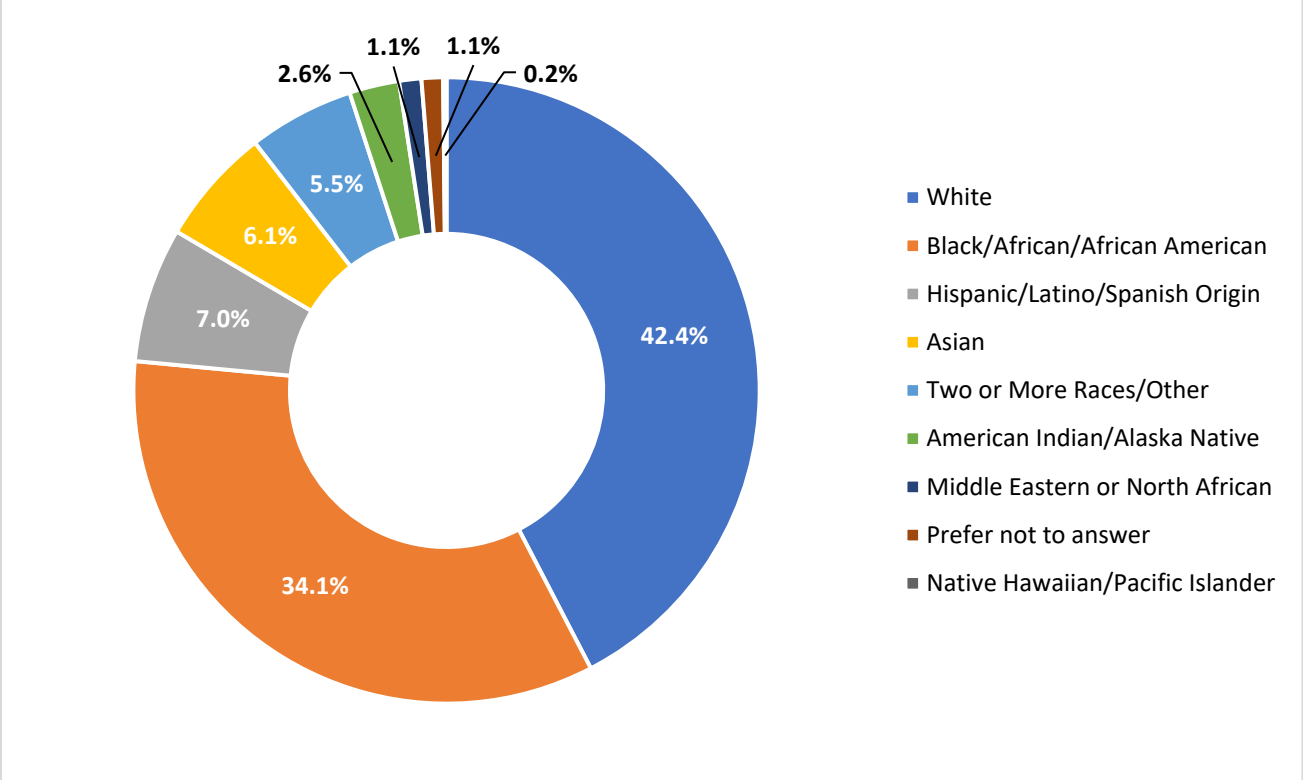
The most recent On-Board Survey data was collected in 2022, using a weighted random sample by ridership by route. The survey was made available in multiple languages, including English, Spanish, Hmong, and Somali. The On-Board Survey includes origin-destination records for 30,983 transit trips across all regional routes and providers. Given its robust sampling methods, the TBI is considered the most accurate source of information on the demographics and travel patterns of Metro Transit customers.

Survey results

The 2022 TBI Transit On-Board Survey provides valuable information regarding the travel behavior of Metro Transit riders, some of which is summarized below. The survey includes questions regarding race/ethnicity and income level, allowing the results to be compared between different population groups.

Approximately 58 percent of Metro Transit customers are BIPOC (Figure 8), compared to 35 percent of the total population within the Metro Transit/Metropolitan Council service area (Table 4). Those who report their race as Black/African/African American (and non-Hispanic or Latino) are the largest racial BIPOC group among the Metro Transit customer base.

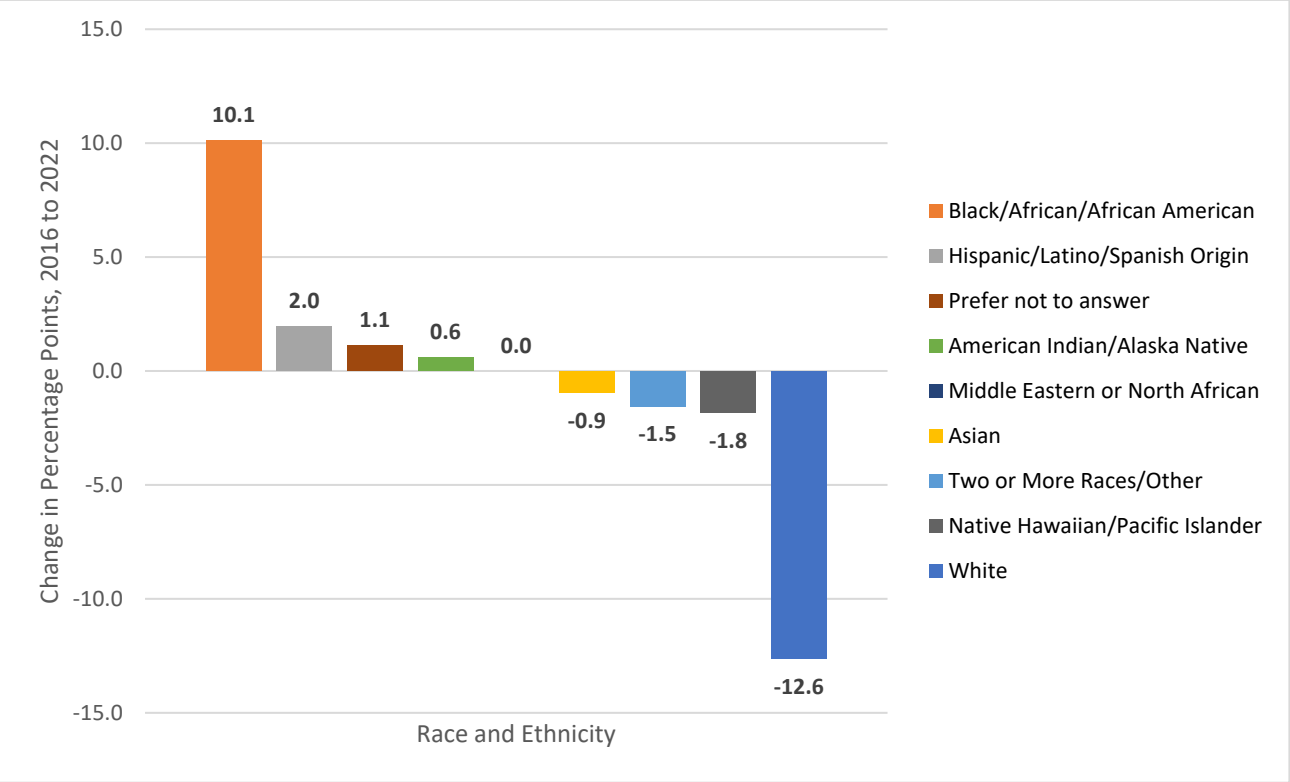
Figure 8: Race and Ethnicity



Source: Metropolitan Council TBI Transit On-Board Survey, 2022.

Figure 9 shows the change in race and ethnicity results between the 2016 and 2022 onboard surveys. The largest changes were an increase of about 10 percentage points among Black/African/African American riders, and conversely a drop of about 12 percentage points among white riders. Other ethnic groups saw more modest changes.

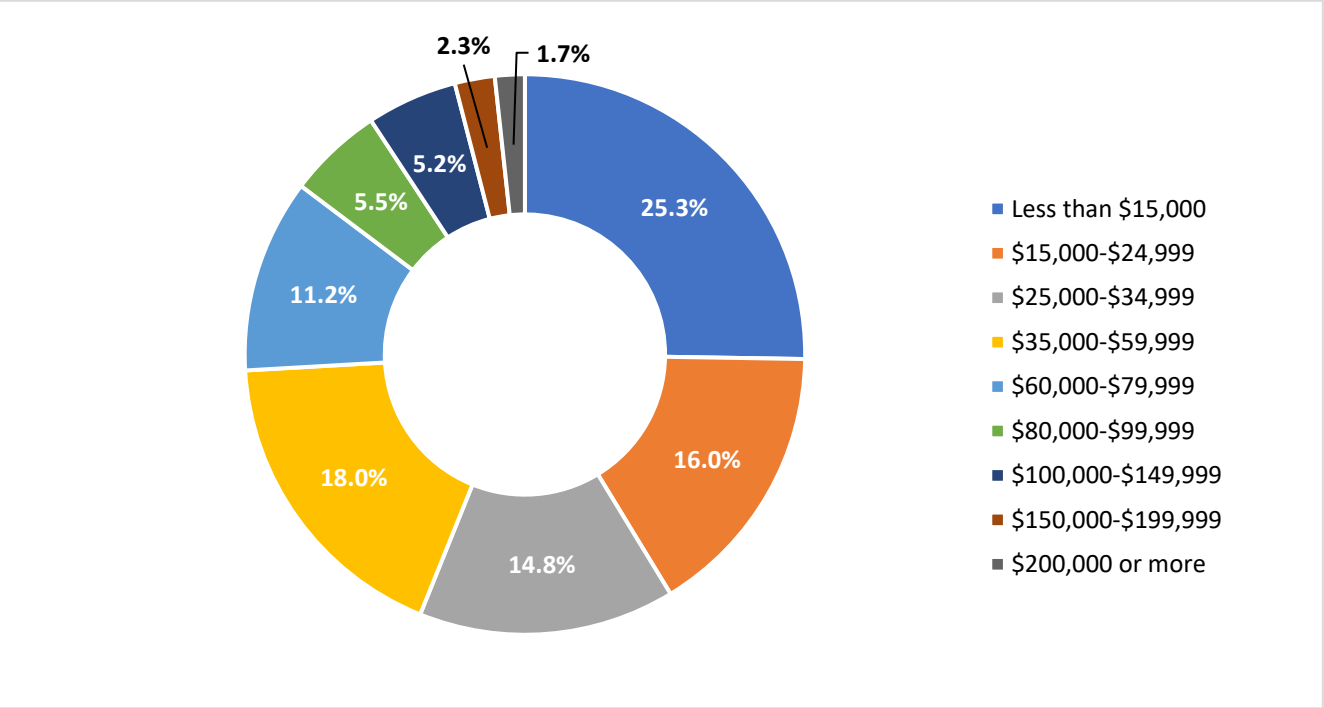
Figure 9: Race and Ethnicity Change, 2016-2022



Source: Metropolitan Council TBI Transit On-Board Survey, 2016 and 2022.

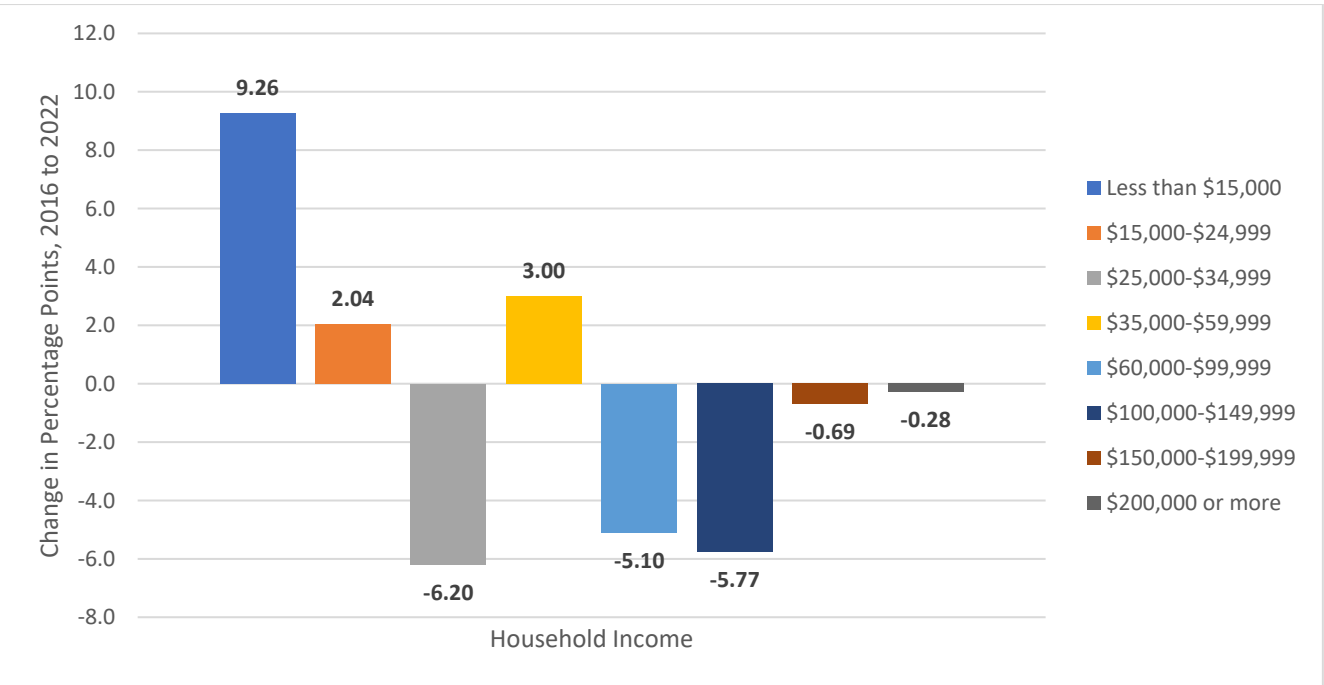
As shown in Figure 10, about three-quarters of Metro Transit riders report an annual household income under $60,000, and more than half report an annual household income under $35,000. When compared to the results for the same question in 2016 (Figure 11), the proportion of ridership in the lowest income bracket has grown, while every bracket from $60,000 upward has fallen in its share of ridership. Overall, reported incomes among riders were lower in 2022 than in 2016.

Figure 10: Annual Household Income



Source: Metropolitan Council TBI Transit On-Board Survey, 2022.

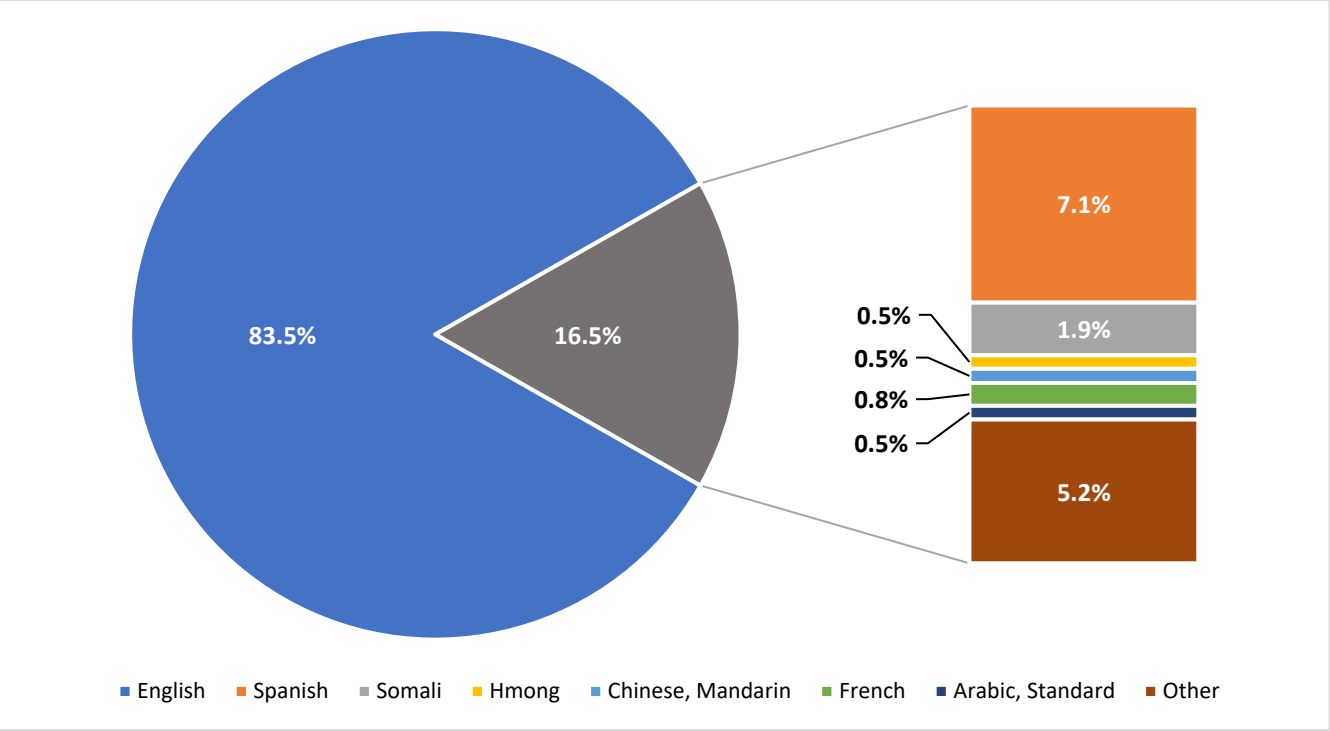
Figure 11: Change in Household Income, 2016 to 2022



Source: Metropolitan Council TBI Transit On-Board Survey, 2016 and 2022.

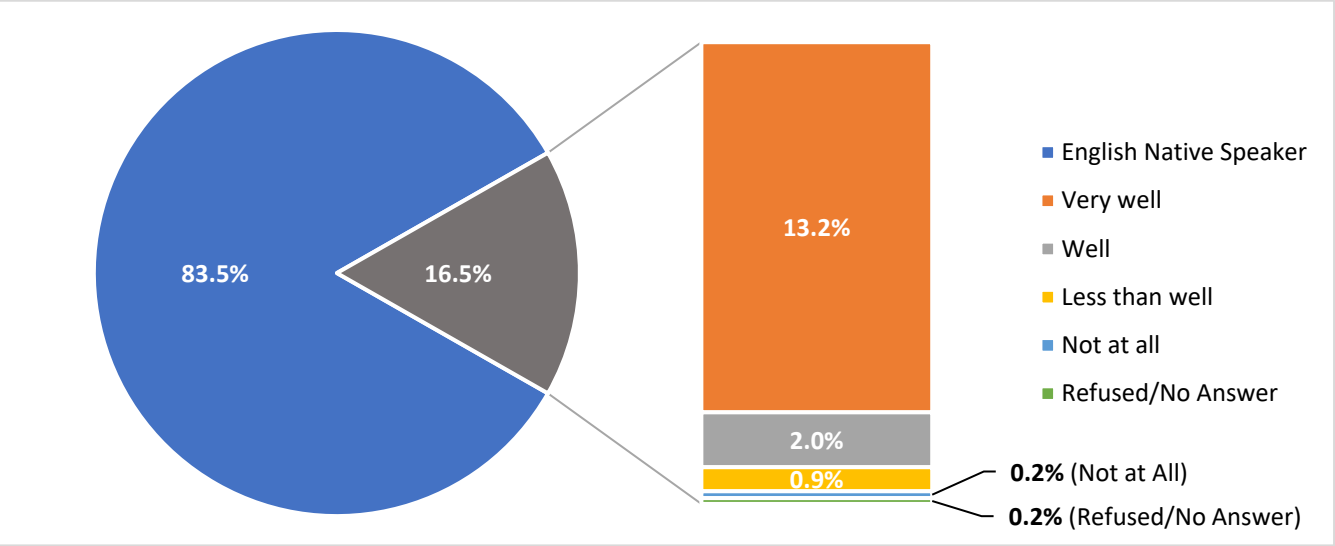
The survey shows about 84 percent of Metro Transit customers speak English as their primary language at home (Figure 12). Spanish and Somali were the next most common languages. Among those who speak a language other than English in their home, most speak English "well" or "very well" (Figure 13).

Figure 12: Language Spoken at Home



Source: Metropolitan Council TBI Transit On-Board Survey, 2022.

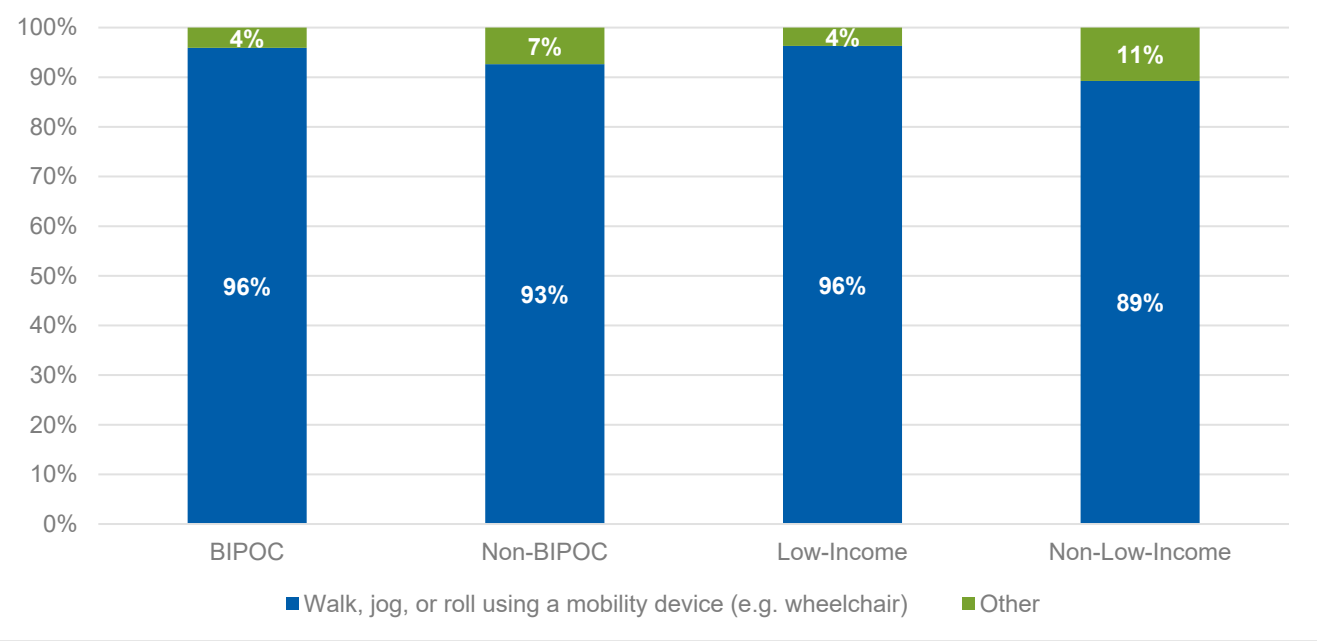
Figure 13: Ability to Speak English



Source: Metropolitan Council TBI Transit On-Board Survey, 2022.

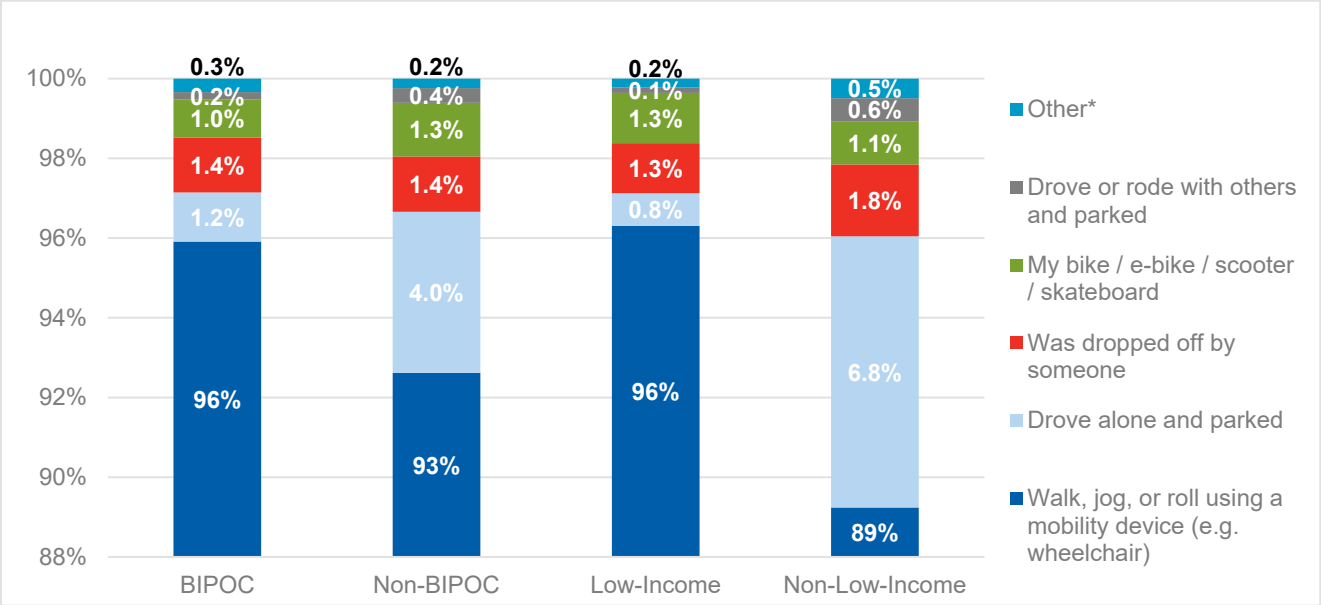
Most Metro Transit passengers walk to access transit (Figure 14). BIPOC and low-income riders are slightly more likely to walk; as shown in Figure 15, this result is driven by non-BIPOC and non-low-income riders' higher likelihood of driving and parking at transit stations. Similar trends are observed for mode of egress from transit, as shown in Figure 16 and Figure 17.

Figure 14: Mode of Access



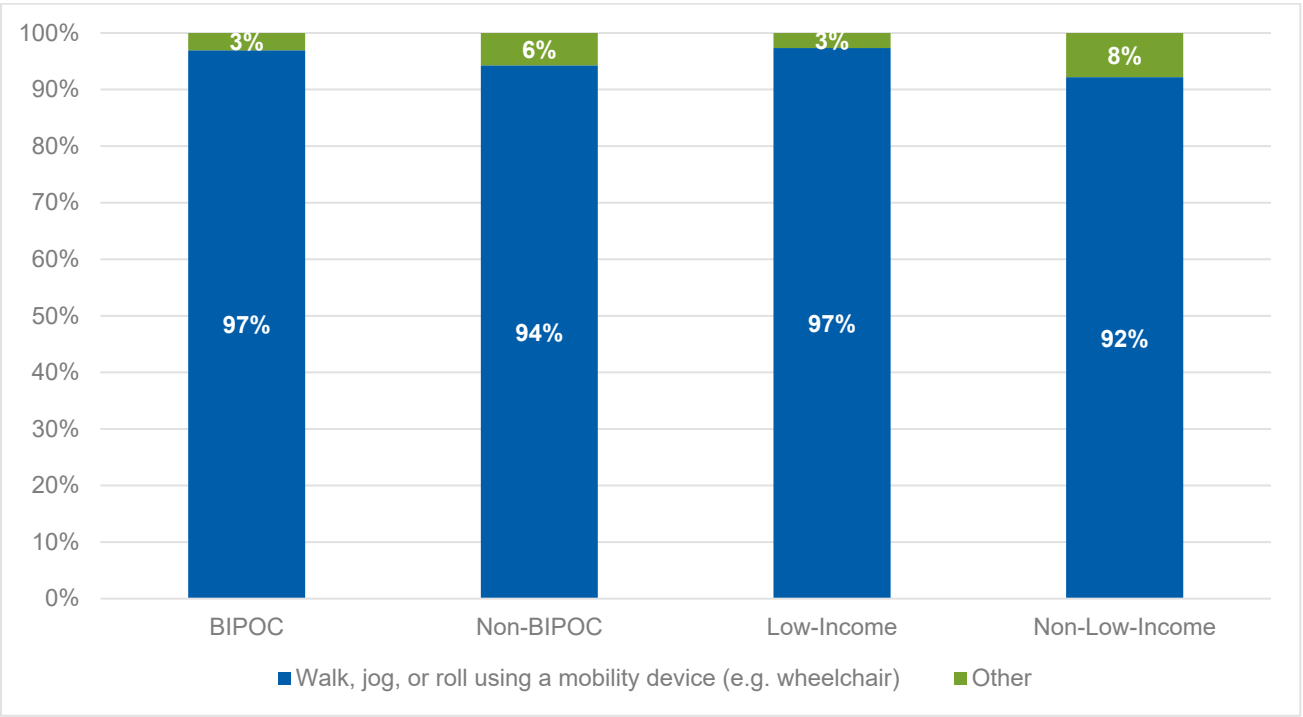
Source: Metropolitan Council TBI Transit On-Board Survey, 2022.

Figure 15: Mode of Access, Detailed



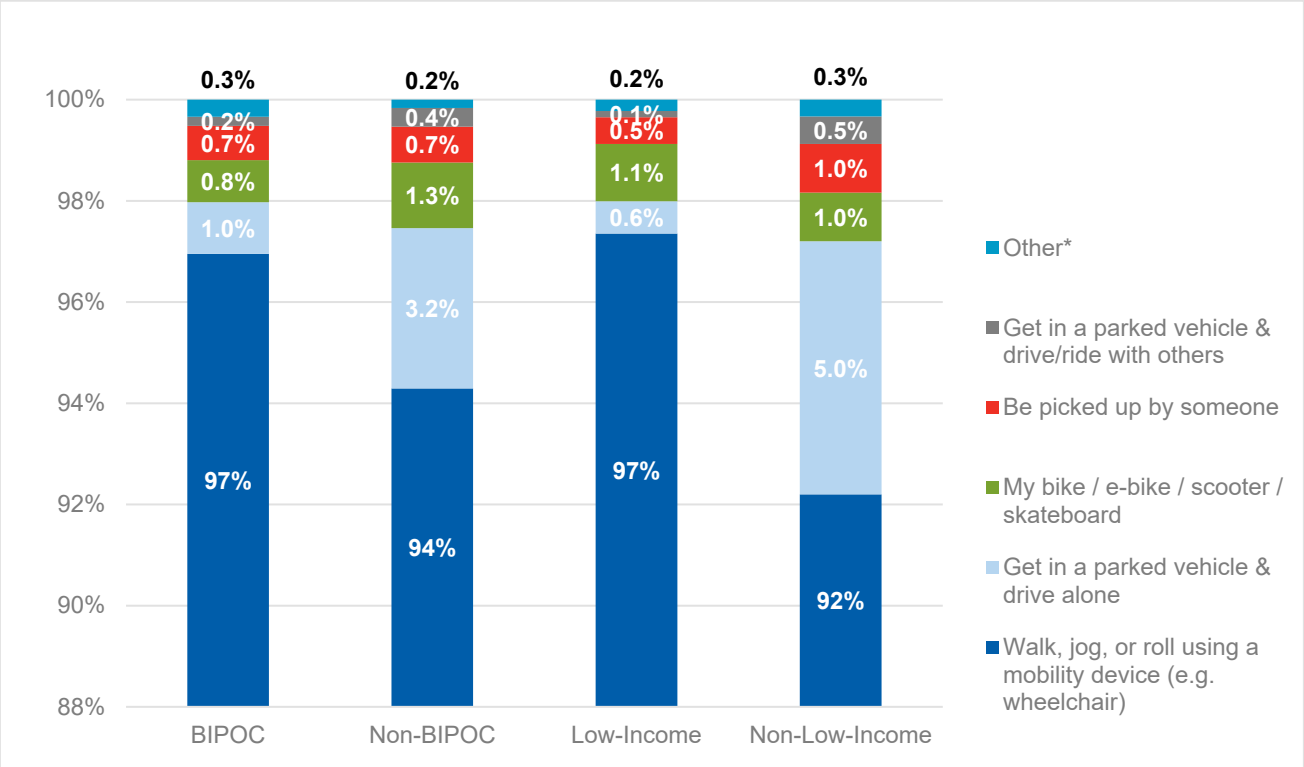
Source: Metropolitan Council TBI Transit On-Board Survey, 2022.
* Other includes Uber, Lyft, Taxi (smartphone ride hailing), Shared bike / e-bike / scooter (e.g. Nice Ride, Bird, Lime), Other

Figure 16: Mode of Egress



Source: Metropolitan Council TBI Transit On-Board Survey, 2022.

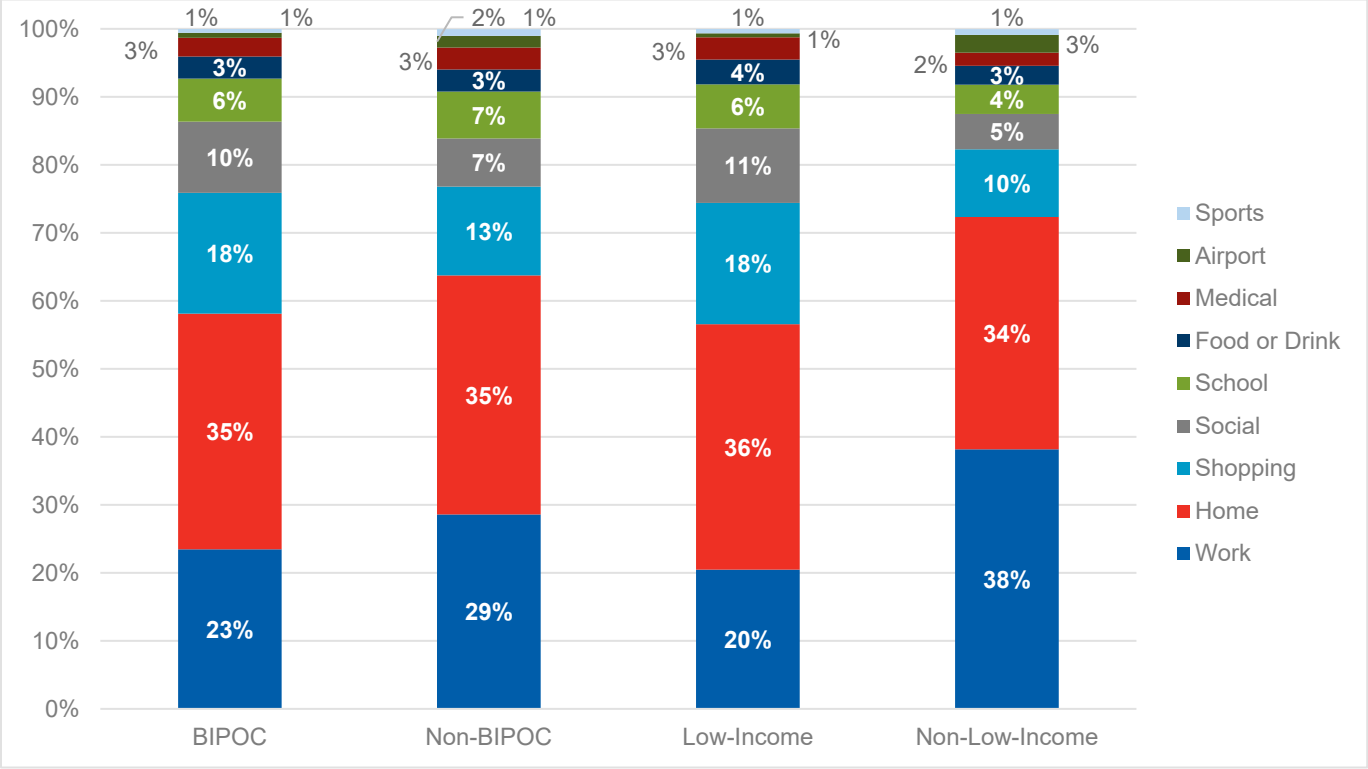
Figure 17. Mode of Egress, Detailed



Source: Metropolitan Council TBI Transit On-Board Survey, 2022.
* Other includes Uber, Lyft, Taxi (smartphone ride hailing), Shared bike / e-bike / scooter (e.g. Nice Ride, Bird, Lime), Other

As Figure 18 shows, going to work is the most commonly reported trip purpose (aside from returning home). Non-BIPOC riders and non-low-income riders are more likely to report work trips, while BIPOC and low-income riders are more likely to use transit for social and shopping trips. Most of these differences are subtle; the most striking difference is that between low-income work trips (only 20 percent of trip purposes) and non-low-income work trips (38 percent of trip purposes).

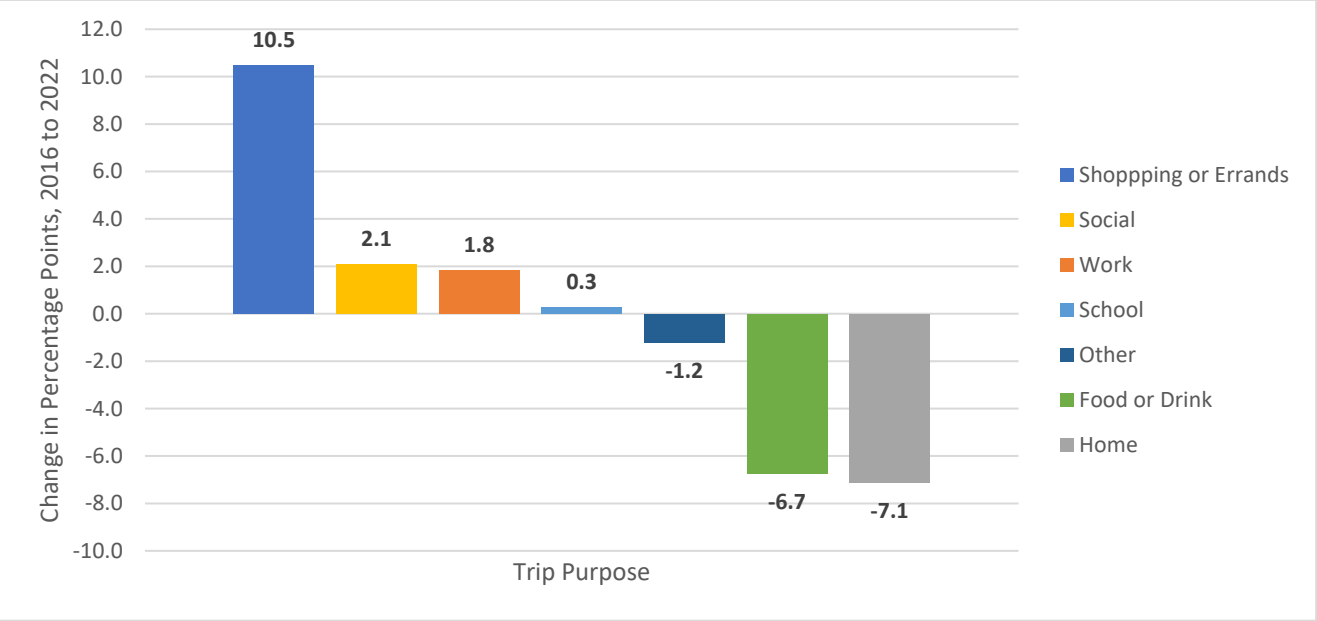
Figure 18. Trip Purpose



Source: Metropolitan Council TBI Transit On-Board Survey, 2022.

Figure 19 shows how trip purposes changed between the 2016 and 2022 On-Board Surveys. As a percentage of total responses, shopping and errands saw the largest change, with an increase in more than 10 percentage points. Trips home saw the largest decrease, followed closely by food and drink.[10]

Figure 19: Trip Purpose Change, 2016-2022

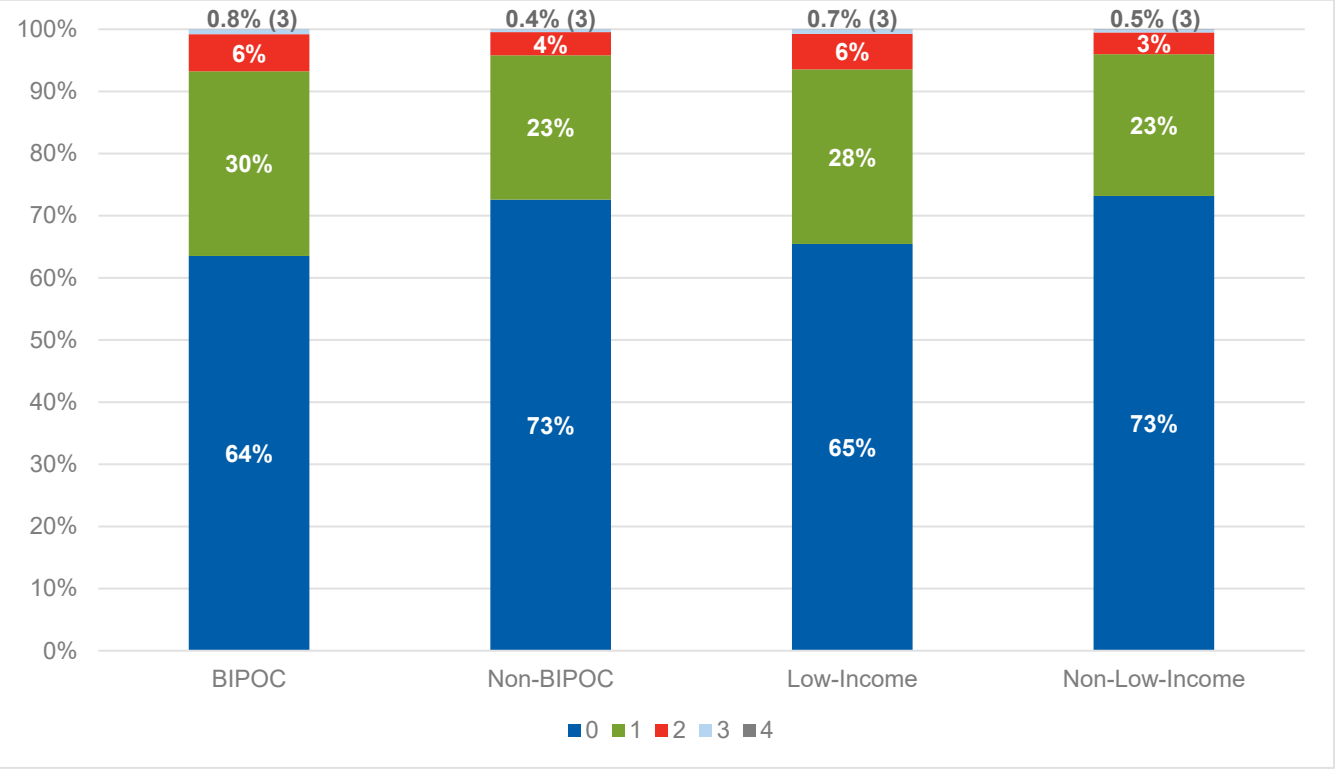


Source: Metropolitan Council TBI Transit On-Board Survey, 2016 and 2022.

[10] For the trip purpose survey question, the question structure and categories differed between the 2016 and 2022 surveys, which may inflate the difference between the two.

Figure 20 shows the number of transfers the survey respondents needed to make to complete their one-way trips. Most trips are made with zero transfers, and more than 90 percent of trips are made with no more than one transfer. BIPOC riders are more likely to transfer than non-BIPOC riders, and low-income riders are more likely to transfer than non-low-income riders.

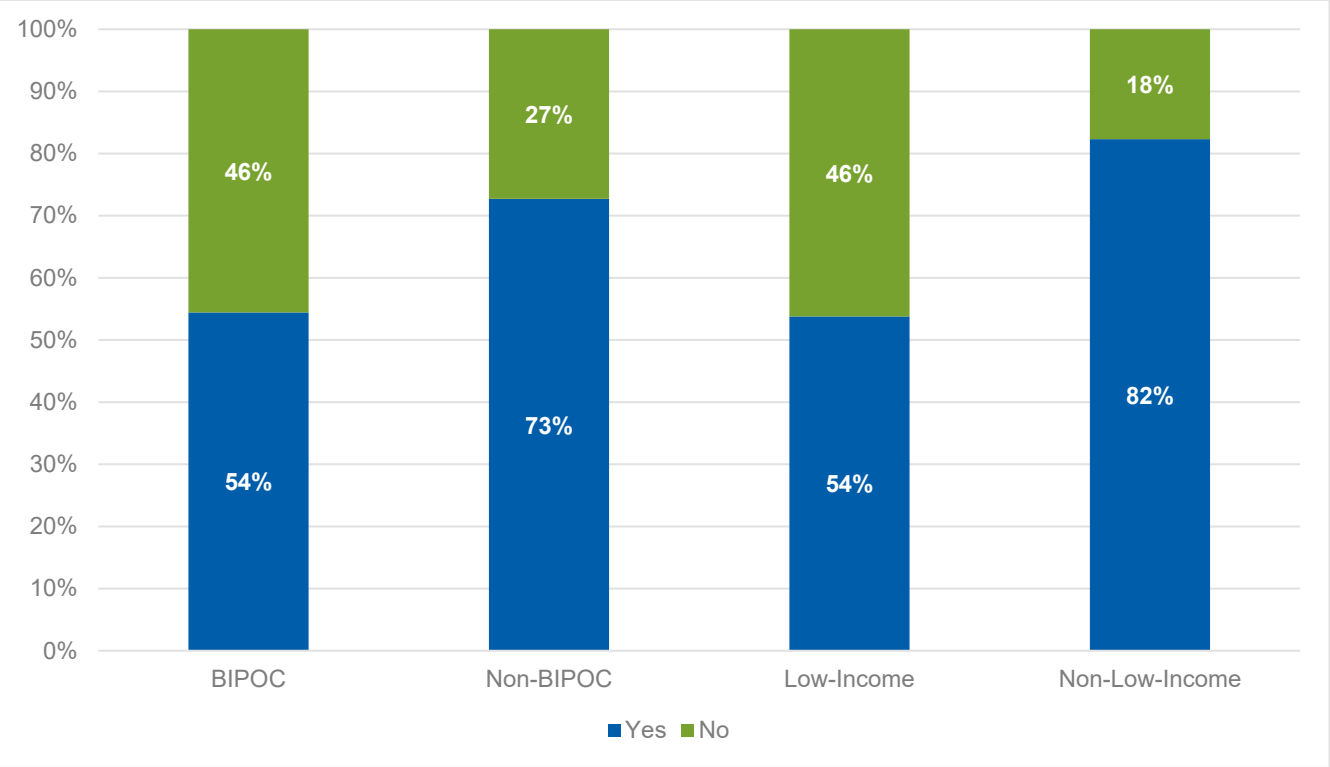
Figure 20. Number of Transfers per One-Way Trip



Source: Metropolitan Council TBI Transit On-Board Survey, 2022.

Figure 21 shows survey respondents who do and do not drive. Just over half of BIPOC riders drive compared to about three-quarters of non-BIPOC riders. A similar difference exists when looking at income. Fifty-four percent of low-income riders drive compared to 82 percent of non-low-income riders who drive.

Figure 21. Riders Who Drive

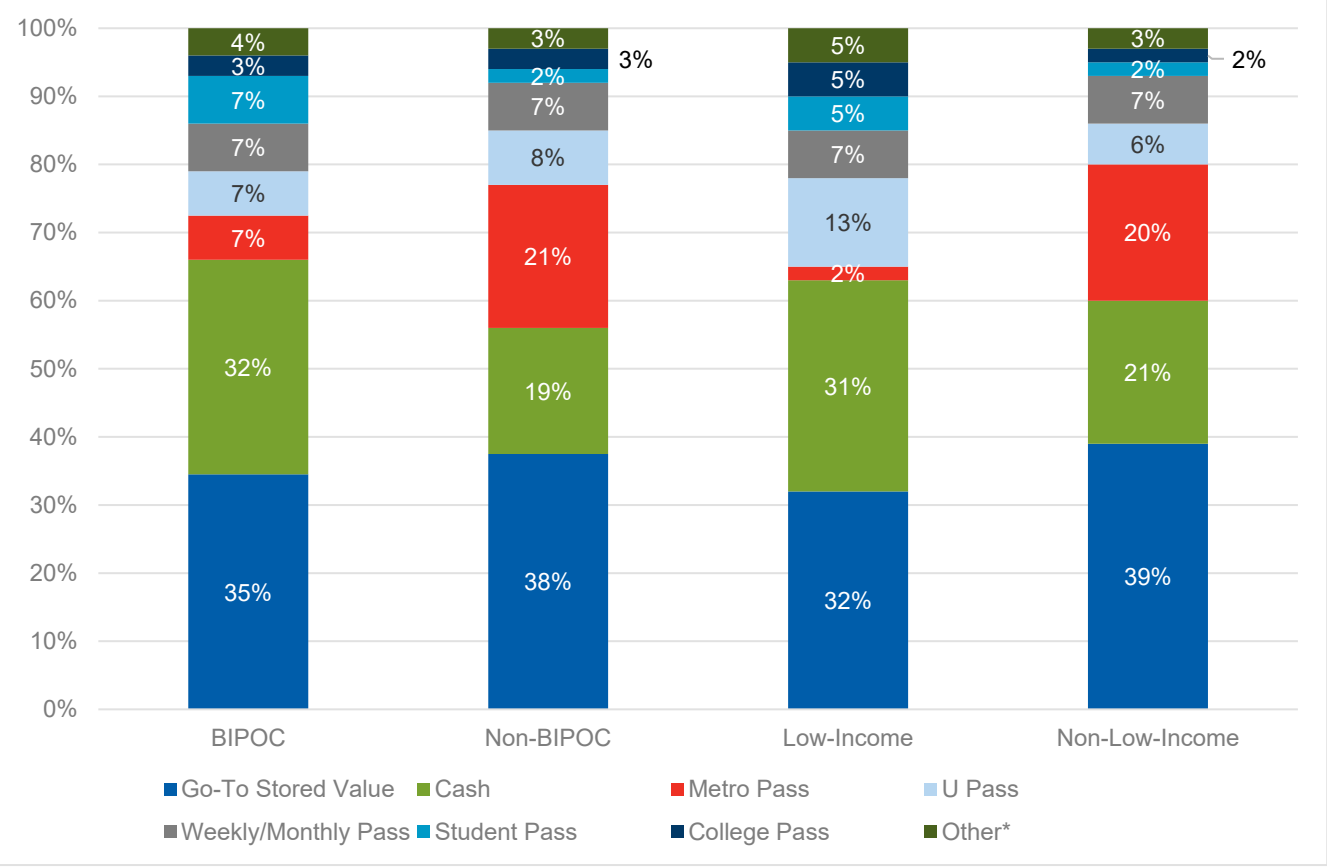


Source: Metropolitan Council TBI Transit On-Board Survey, 2022.

The 2022 On-Board Survey did not ask questions about fare payment. Responses from the 2016 survey are shown below.

For all groups, the fare type used most often was go-to stored value (Figure 22). BIPOC riders in 2016 were more likely to use cash than non-BIPOC riders; this pattern was similar based on income, with low-income riders using cash fare at greater rates than non-low-income riders. Non-BIPOC riders were three times more likely than BIPOC riders to pay their fare using Metro Pass, a fare instrument provided to employees by companies and organizations; the difference was even greater based on income, with non-low-income riders using Metro Pass at 10 times the rate of low-income riders.

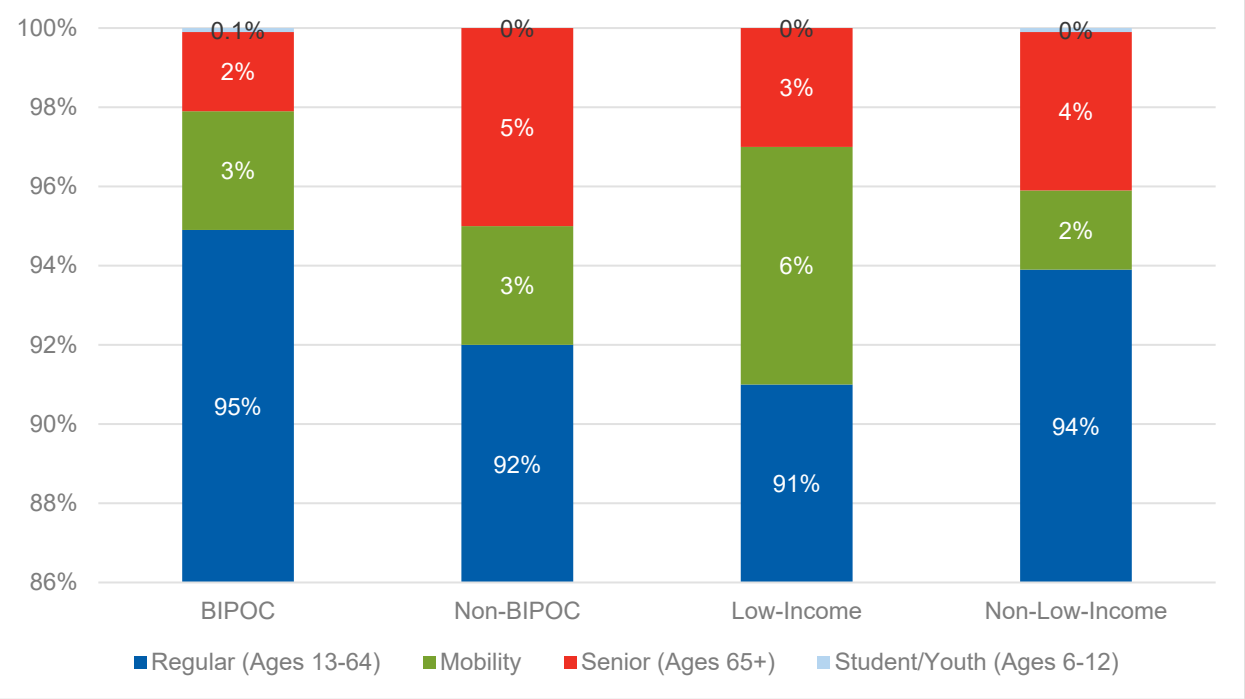
Figure 22: Fare Payment Method



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

Figure 23 shows the fare type by each demographic group. The distribution is similar among each of the groups, with a few exceptions. A larger proportion of riders used a senior fare among non-BIPOC riders compared to BIPOC riders. Also, low-income passengers were more likely to purchase a Mobility fare – available to persons with disabilities – than non-low-income people.

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 located in an urbanized area with a population of more than 200,000 and which operate 50 or more vehicles in peak service evaluate the equity impacts of proposed service and fare changes on BIPOC and low-income populations.

In order to accomplish this, transit providers are required to develop a “major service change” policy to determine when an equity analysis is required. They are also required to develop policies for determining when a proposed major service change will result in a disparate impact to 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 must be included in the agency’s Title VI Program.

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

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

The following service changes are exempt:

- Seasonal service changes
- Route number or branch letter designation
- Any change or discontinuation of a demonstration route within the first 24 months of operation
- Changes on special service routes such as State Fair, sporting events, and special events
- Route changes caused by an emergency. Emergencies include, but are not limited to, major construction, labor strikes, pandemics, staffing shortage, and inadequate fuel supplies

- Any service change that does not meet the conditions of a major service change as defined above.

Disparate Impact and Disproportionate Burden Policies

The Metropolitan Council uses a 10-percentage points 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 percentage points of the effects borne by the non-BIPOC population, then the proposed change would pose a potential disparate impact. If the effects of a major service change borne by low-income population, both adverse and beneficial, are not within 10 percentage points of the effects borne by the those not of low-income, then the proposed change would pose a potential disproportionate burden.

This policy means that there could be evidence of disparate impact or disproportional burden if:

- Benefits are being provided to BIPOC or low-income populations at a rate less than 90 percent of the rate at which benefits are being provided to non-BIPOC or non-low-income populations.
- Adverse effects borne by non-BIPOC or non-low-income populations at a rate less than 90 percent of the rate at which adverse effects are borne by BIPOC or low-income populations.

If a potential disparate impact is found, 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. If a potential disproportionate burden is found, FTA requires the provider to evaluate alternatives and mitigate burdens where practicable.

The Metropolitan Council's Disparate Impact/Disproportionate Burden policy does not consider a beneficial effect beyond 10 percentage points 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 Metropolitan 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 Metropolitan Council approving the updated policy. The updated policy increased the threshold from 80 percentage points to 90 percentage points 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 in 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 Metropolitan Council received comments during the month of August 2022, hearing from two organizations and 15 individuals.

The survey was promoted widely on the Metropolitan Council's social media channels (111,000 followers across platforms), in its email newsletter (24,000 subscribers), and on the Metropolitan 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 [percentage points] to 10 [percentage points]. Several respondents also took the opportunity to identify additional concerns about the transit system overall. Table 6 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.

Table 6. Survey Responses on DI/DB Threshold Change

Age	Gender	Race	Disability Status	Topic/feedback
55-64	M	White	n/a	• Support change to 10% • Recommend assessing a true relative standard
35-44	F	White	n/a	• Support change to 10%
n/a	F	n/a	n/a	• Concern about people not paying on transit
35-44	F	White	Yes	• 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	• Concerns about cost burdens on low-income people and older adults on fixed incomes
35-44	F	White	n/a	• Support change to 10%
55-64	n/a	White	Yes	• 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	• Support change to 10%
n/a	n/a	n/a	n/a	• Unsure how policy assesses low-income status (no contact information for follow-up)
55-64	M	n/a	n/a	• Questioned the way trips are evaluated under the standards (no contact information for follow-up)
25-34	M	White	n/a	• Support change to 10% • Suggests increasing budget to support additional investigations and mitigation
85+	M	White	n/a	• 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	• 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	• Support change to 10%
65-74	M	White		• 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 using the number of 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. A five-minute (one quarter mile) walkshed is considered for bus stops while a ten-minute (one half mile) walkshed is considered for BRT, LRT, and commuter rail routes.

3. Calculate the percent change and absolute change in service between the current and proposed service levels for each census block.[11]

4. Calculate the population-weighted average percent change and absolute change in service for all population groups within the area served by transit in either time period.

---

[11] Circular IV-15: “Each service change analysis must compare existing service to proposed changes, and calculate the absolute change as well as the percent change. … Any service change analysis shall be expressed as a percent change in tabular format.”

5. Determine whether the proposed service will result in a potential disparate impact or disproportionate burden by applying the disparate impact and disproportionate burden policies.

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. Results from the TBI On-Board Survey are used to identify the race/ethnicity, household size, household income, age, and disability status for each passenger.

The 2022 TBI On-Board Survey questionnaire did not include questions about fare payment. For this reason, recent fare equity analyses have combined survey data with farebox data to estimate the number of BIPOC, non-BIPOC, low-income, and non-low-income users of each payment type. For the racial analysis, fare types are assumed to be distributed similarly among BIPOC and non-BIPOC riders on the routes being analyzed. For the income analysis, all riders using the TAP fare program are assumed to be low-income per the program policy, but other fare types are assumed to be similarly distributed among low-income and non-low-income riders.

These estimates are then used to calculate the average percent change in fare for BIPOC, non-BIPOC, low-income, and non-low-income riders. The threshold is applied to determine whether there might be disparate impacts or disproportionate burdens.

Recent equity analysis results

Six service equity analyses (SEA) and four fare equity analyses (FEA) were completed between October 2022 and October 2025 (Table 7). While a few analyses found a potential for disparate impact and/or disproportionate burden, in every instance there was additional context supporting the action under analysis. These equity analyses and documentation of approval are shown in Attachment G.

Table 7. Recent Equity Analysis Results

Equity Analysis Project	Potential for Disparate Impact	Potential for Disproportionate Burden
2022 Year-over-Year SEA	No	No
2023 Year-over-Year SEA	No	No
2024 Year-over-Year SEA	No	No
Gold Line SEA	No	No
Network Now SEA	No	No
Implementation of Route 32/62 Fare-Free Pilot FEA	No	No
End of Route 32/62 Fare-Free Pilot FEA	No	No
Fare Simplification FEA	No	No
Northstar Transition SEA	Yes	Yes
Northstar Transition FEA	No	Yes

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 the 2050 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 Metropolitan 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 2050 Transportation Policy Plan defines unique transit market areas using the demographic and urban design factors that are most associated with successful local, regular-route transit service (Table 8).

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. 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 8: Transit Market Areas

Transit Market Area	Land Use Characteristics	Typical Transit Service
Market Area I	Primarily Urban and Urban Edge communities where walkability and density of population and jobs can support higher transit service levels. These areas also have the largest concentrations of residents who rely on transit as their primary means of transportation.	Dense network of local routes with frequent, all-day service that serves a wide variety of trip purposes.
Market Area II	Similar to Market Area I.	Similar network structure to Market Area I, but lower level of service, as demand warrants.
Market Area III	Mainly lower-density Urban Edge and Suburban communities. It is characterized by lower density and less transit-supportive street networks and land use but with some pockets of denser development.	Transit service includes suburban local routes, express and commuter service, and non-regular-route transit services, usually dial-a-ride, providing basic transportation access.
Market Area IV	Mostly Suburban Edge communities along with portions of Suburban communities. It is characterized by low population and job densities that do not support frequent local transit service, and a spread-out, often circuitous, street network that hinders efficient routing.	Mainly peak-period express and commuter service at Park & Rides, which can effectively gather the lower density transit demand into one spot. There are some suburban local routes, including suburb-to-suburb connectors, although service is typically very infrequent. Non-regular-route transit, usually dial-a-ride, is generally available.
Market Area V	Generally Rural communities including Rural Centers but also some Suburban Edge communities as well as freestanding town centers Stillwater, Waconia, Forest Lake, and Hastings.	Market Area V is characterized by very low-density development or undeveloped land not well suited for regular-route transit service outside of limited peak-period express and commuter service.
Emerging Market Areas	Unique areas of Transit Market Areas III and IV where there are significant pockets of higher density, but conditions in the surrounding area still limit the success of local transit.	These areas should be a focus for future development that will connect them with areas of higher transit intensity, specifically looking at extensions of existing routes or connections.
Freestanding Town Center	Cities in the metropolitan planning organization region that grew independently of Minneapolis and Saint Paul but are still separated from the urban and suburban areas by rural land. These communities typically have small downtowns of their own but many of their residents commute to work in other regional centers.	May have express service demand and possible demand for small circulator services.

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.

Regular-route bus service provides access to the transit system for a large proportion of the urbanized area. It includes the following route types:

- **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 designed to provide crosstown connections within Market Areas I and II. Typically, these routes do not serve a downtown but provide important connections between Core Local routes and more direct access between urban neighborhoods than Core Local bus service would provide alone.

- **Suburban Local Bus** routes typically operate in Market Areas II and III and serve an important role in providing basic transit coverage throughout the region. This includes suburb-to-suburb connections and linking urban and suburban communities.

- **Commuter and Express Bus** mostly operate during peak periods, serving commuters going to either downtown, the University of Minnesota campus, or to a major employment center. These routes typically operate on highways for portions of the route between picking up passengers at a few stops in residential areas or Park & Ride facilities. They perform best when they serve compact areas without free and/or plentiful parking, and when transit travel times are competitive with driving alone.

Transitway modes are more permanent and long-range than regular-route bus. They focus future growth and act as a catalyst for development in the region. Transitways include the following route types:

- **Arterial Bus Rapid Transit (BRT)** is focused on providing fast, frequent, and more reliable service with a better customer experience on corridors with strong demand for existing local bus service. These corridors are in highly developed areas of the region where available right-of-way limits the ability to implement facilities for light rail or dedicated BRT. Arterial BRT generally operates in mixed traffic on local streets with stations spaced half a mile apart. Arterial BRT can also use transit advantages such as on-street bus lanes and transit signal priority. Customer amenities include improved stations and customer information, unique vehicles and branding, and off-board fare collection that reduces vehicle stopping time.

- **Highway BRT** connects regional centers near highways and facilitates longer-distance travel with fewer stops. Highway BRT stations are spaced about one to two miles apart and lines generally operate where buses can use transit advantages like bus-only shoulders, managed lanes, and ramp meter bypasses. Highway BRT service is often complemented with express bus service that uses the same facilities and coordinates with local bus connections. Otherwise, highway BRT is similar to other types of bus rapid transit and light rail in terms of frequency, fare collection, technology, and customer information.

- **Dedicated BRT** uses special roadways or lanes used exclusively by the buses for most of the route. Dedicated BRT is often considered the most like light rail based on how it operates and the level of investment. Dedicated BRT has more flexibility than light rail because the dedicated guideway and stations can be shared with other services, such as express or local bus. Buses can also operate in short segments of mixed traffic where space is too limited to build a dedicated guideway. The METRO Gold Line is the first dedicated BRT transitway in operation in the region.

- **Light Rail Transit** is all-day, frequent service that connects dense employment and population centers with each other and operates on rail tracks primarily in exclusive runningway. The vehicles are powered by overhead electrical wires. Stations are typically spaced about a half to one mile apart. Typical light rail lines in this region extend 10 to 15 miles out from the urban core and primarily serve the most densely developed areas of the region. Light rail service operates in both directions at a high frequency.

- **Commuter Rail** is an express service that connects downtown employment centers to distant population centers or ridership aggregators such as Park & Ride facilities and transit centers. Commuter rail typically operates with diesel vehicles on existing freight railroad tracks. Metro Transit suspended its only commuter rail service, the Northstar Line, effective January 2026 due to high operating costs and low ridership.

- **Modern Streetcars** are not presently in operation within Metro Transit's service area, but have been explored for investment in the region. This service emphasizes high frequency and high accessibility in urban areas with high transit demand. Modern streetcars typically operate in mixed traffic, similar to a local bus route or some bus rapid transit routes but may have an exclusive runningway for part or all of the route. They typically stop every few blocks, travel at slower speeds, and their overall route length is usually shorter than light rail lines.

Vehicle load

Metro Transit's maximum load standards are shown in Table 9. Vehicle load standards consider the seating capacity of various bus types, the route type, and time of day (i.e., peak or off-peak). While the availability of seating is a contributing factor to a pleasant transit experience, it is not always feasible during peak periods. Standing loads (i.e., a vehicle load in excess of the seating capacity) are acceptable in some instances, such as on light rail vehicles and during peak service. The exceptions to this are maximum peak loads on

Commuter/Express service with more than four miles of travel on freeways, where the load standards are equal to seating capacity regardless of time of day.

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

Vehicle load data is continuously collected aboard buses and LRT vehicles using automatic passenger counter (APC) equipment.. 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 9: Vehicle Loading Standards

Route Type	Bus Type	Peak Load Standard	Off-Peak Load Standard
Core Local Bus	Standard 40’ Bus	48	38
	Articulated 60’ Bus	71	57
Supporting Local Bus	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 10 displays the recommended minimum headway by bus route type and market area. Transitway standards do not differentiate by market area and are shown in Table 11.

Table 10: Bus 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*
Commuter Express Bus	30” Peak	30” Peak	Peak – 3 trips	Peak – 3 trips	*NA*
Reverse Commute Bus	Peak – 3 trips	Peak – 3 trips	Peak – 2 trips	Peak – 2 trips	*NA*

Table 11: Transitway Headway Standards (Minimum Level of Service)

Route Type	Weekday Peak 6:00 a.m. – 9:00 a.m., 3:00 p.m. – 6:30 p.m.	Weekday Midday 9:00 a.m. – 3:00 p.m.	Weekday Evening 6:30 p.m. – 1:30 a.m.	Weekday Early / Late 1:30 a.m. – 5:00 a.m.	Weekend Day / Evening	Weekend Early / Late
Arterial BRT*	15”	15”	15”	30”	15”	30”
Highway BRT**	15”	15”	Specific***	Specific***	Specific***	Specific***
Dedicated BRT	15”	15”	15”	30” – 60”	15”	30” – 60”
Light Rail Transit	15”	15”	15”	30”	15”	30” – 60”
Commuter Rail	5 trips	Specific***	Specific***	Specific***	Specific***	Specific***

*Arterial BRT frequency is inclusive of underlying local routes
**Highway BRT frequency is inclusive of underlying express routes
***Specific service frequency is based on demand

On-time performance

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

The definitions of "on-time" performance 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 each quarter to account for seasonal factors and specific construction activity. For reference, the most recent Service Monitoring Evaluation, completed using autumn 2023 records, found that 75 percent of LRT trips were on-time, 70 percent of commuter rail trips were on-time, and bus performance by route varied between 70 percent and 97 percent on-time.

Service availability

Metro Transit evaluates service availability using three separate standards: span of service, route spacing, and stop spacing.

Span of service

Service span refers to the times of day a route runs. A route type's role in the overall transit network directs its span of service guidelines. As such, commuter routes are recommended to operate primarily in peak periods while core local routes operate more broadly. Table 12 shows service standards for bus service. Transitway span of service standards are structured differently as minimum hours or number of trips as shown in Table 13.

Table 12: Bus Span of Service Standards

Route Type	Weekday Peak 6:00 a.m. – 9:00 a.m., 3:00 p.m. – 6:30 p.m.	Weekday Midday 9:00 a.m. – 3:00 p.m.	Weekday Evening 6:30 p.m. – 1:30 a.m.	Weekday Owl 1:30 a.m. – 5:00 a.m.	Weekends and Holidays
Core Local Bus*	Always Provided	Always Provided	Always Provided	Provided as Demand Warrants	Always Provided
Supporting Local Bus	Always Provided	Always Provided	Always Provided	Provided as Demand Warrants	Occasionally Provided
Suburban Local Bus	Always Provided	Always Provided	Occasionally Provided	Provided as Demand Warrants	Occasionally Provided
Commuter and Express Bus	Always Provided	Occasionally Provided	Provided as Demand Warrants	Provided as Demand Warrants	Provided as Demand Warrants

*Local limited-stop routes operate primarily during the weekday peak period

Table 13: Transitway Minimum Span of Service Standards

Route Type	Weekdays	Weekends
Bus Rapid Transit*	18 hours	18 hours
Light Rail Transit	18 hours	18 hours
Commuter Rail	10 trips**	*N/A*

*Includes arterial, highway, and dedicated bus rapid transit
** Minimum five trips per peak period

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 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 14 shows 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 14: 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	*NA*	2 miles	Specific**	Specific**	*NA*

*Local limited stop routes do not follow a route spacing guideline. They will be located in high demand corridors.
** Specific means that route structure will be adapted to the demographics, geography, and land use of specific area.

Stop spacing

Stop spacing guidelines must balance the competing goals of providing greater access to service with faster travel speeds. More stops spaced more closely 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 15 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 15: 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
Dedicated BRT	1/2 to 1 Mile
Light Rail	1/2 to 1 Mile
Commuter and Express and Reverse Commute 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.

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.

Amenities at transit stops

Metro Transit uses guidelines to prioritize the locations where investments are made and the types of facilities it can install and maintain across the system.

It 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. 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 16 summarizes the guidelines for new amenity placement.

Table 16: Customer Amenities at Transit Stops

Amenity	METRO (LRT, BRT) & Commuter Rail Stations*	Transit Centers	Bus Stops
Route Description/Map	Standard feature	Standard feature	Standard feature at Tier 2 stops
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 20+ daily boardings
Light	Standard feature	Standard feature	Optional feature, prioritized for bus stops with high boardings during dark hours or where there are documented personal safety concerns
Heat	Standard feature	Standard feature	Optional feature, prioritized for major transfer points with 70+ daily boardings
Trash Receptacles	Standard feature	Standard feature	Not provided at transit stops 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.

Bus stops with 20 or more daily boardings may be considered for a bus shelter. Shelters are prioritized based on transit transfers, equity considerations, and community destinations.

Once a bus stop is identified as a priority for a shelter based on the guidelines, site factors such as available space, slope, and obstructions determine if a shelter can be located at a bus stop.

Shelters at bus stops are prioritized by the following factors:

- The bus stop is a major transfer point where customers wait to change transit routes.
- Equity consideration areas: where the demographics near the bus stop show more people with disabilities, older adults, people with lower income, and households with fewer cars.
- Community destinations: where the stop is near grocery stores and food access; hospital, healthcare, or social services, or where children are waiting (schools, parks, community center, library).

Separate guidelines pertain to bus shelter removal and replacement:

- Aging bus shelters are typically replaced at bus stops with 10 or more daily boardings.
- Metro Transit considers permanently removing a bus shelter where the bus stop consistently has fewer than 10 daily boardings and no transit service improvements are planned.

Vehicle assignment

The Metropolitan Council adopted Fleet Management Procedures in 2012. These procedures are designed to facilitate compliance with FTA and Title VI standards, assure that vehicles purchased meet minimum standards, and create efficiencies and improve flexibility in the deployment/reassignment of vehicles to the extent feasible. In select situations, a specific bus type or size is assigned to a route or geographic area.

Metro Transit has five bus garages, along with two light rail operations and maintenance facilities and one commuter rail facility. 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. MTS routes are operated out of four garages.

Vehicle types

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

Commuter coach buses

Coach buses may be used on express trips carrying riders on a one-way trip length of 15 miles or longer and duration of more than 30 minutes. Although coach buses are 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, and 25. Numerous other routes are also assigned hybrid buses.

Articulated buses

Articulated buses are used on a variety of routes with heavy ridership including local and commuter and express. 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, C, D, Orange, Gold and Red Lines. METRO A, C, D, and Orange Line buses have no on-board fare collection. BRT buses have fewer seats to allow for better passenger circulation.

Articulated BRT buses

Currently, the METRO C, D, Gold and Orange Lines use articulated BRT buses. These buses have no on-board fare collection. 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 on-board fare collection. 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

3. Vehicle type: 40-foot or articulated, based on ridership as assigned by Service Development

4. Average fleet age: A fair and balanced average fleet age will be maintained throughout all garages. This ensures knowledge of new technology will be broadly distributed to all mechanics and helps keep both operators and mechanics system-wide sharing the benefits of new equipment.

5. Sub-fleets: A particular vehicle design or configuration should be kept together whenever possible

6. Stability: A bus is kept at the same garage its entire service life, if possible, to provide ownership and accountability to the garage.

7. Sequential numbers: Sequentially numbered groups of buses are kept together whenever possible to ease administrative tracking

8. Propulsion: Electric buses are currently assigned to the Heywood and East Metro garages because these garages are equipped with charging infrastructure.

Private provider fleet management

MTS assigns vehicles to a specific contracted provider garage as part of the contract; those buses normally do not transfer to another provider during the life of the contract. If a new provider is awarded a service contract, the buses follow the service. Buses are moved from one contract to another only occasionally as 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 Metropolitan Council-owned buses in public transit service in the region.

The contractor can assign any bus to any route as long as it is the correct size and type of bus. As a matter of practice, private providers prefer to assign the same vehicle to the same operator on a regular basis to track vehicle maintenance and condition concerns.

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.

Service monitoring evaluation

The most recent Service Monitoring Evaluation was completed in 2025. Note that the results include midday service as a standard in lieu of span of service. The 2025 Service Monitoring adhered to the prior Title VI Program with 2040 Transportation Policy Plan standards. Each of the remaining 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 17.

The most recent Service Monitoring Evaluation generally found no disparate impacts to BIPOC populations nor disproportionate burdens to low-income populations. One exception was that unwarranted heating in shelters showed apparent disparate impacts and disproportionate burdens, because these locations' post-pandemic ridership had dropped below the warrant threshold but their heaters had not been removed. This was not judged to require mitigation.

Table 17: Service Monitoring Summary

Standard/Policy	Disparate Impact	Disproportionate Burden
Vehicle Load	No	No
Vehicle Headway	No	No
On-Time Performance	No	No
Service Availability: Route Spacing	No	No
Service Availability: Midday Service	No	No
Service Availability: Stop/Station Spacing	No	No
Distribution of Amenities at Bus Stops	No*	No*
Distribution of Amenities at Transit Centers	No	No
Distribution of Amenities at Stations	No	No
Vehicle Assignment	No	No

* No disparate impacts or disproportionate burdens identified for amenities warranted by Metro Transit service standards.

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 the last Service Monitoring Evaluation, 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: MPO Requirements

As the Metropolitan Planning Organization (MPO) for the Twin Cities region, the Metropolitan Council is responsible for the seven-county metro area. Because portions of Sherburne and Wright counties were added to the metropolitan urbanized area after the 2010 Census, these areas are also now included in the metropolitan planning area (although they are not otherwise under the Metropolitan Council's jurisdiction).

An MPO is a federally designated, transportation policy-making organization that ensures that both existing and future expenditures for transportation projects and programs are based on a comprehensive, cooperative, and continuing process. This is known as the "3-C" process. A region's MPO is charged with long-range transportation system planning for all modes and the programming of short-term federal transportation funds.

Locally, the distribution program for federal funds is known as the Regional Solicitation. The Metropolitan Council's 17-member policy board is the decision-making board. Working closely with Metropolitan Council's Transportation Advisory Board, it allocates funds through the Regional Solicitation process. The Transportation Advisory Board consists of 34 members who are local officials, as required by state law; it advises Metropolitan Council on transportation-related issues. Table 3 depicts the racial composition of the Transportation Advisory Board. The urbanized portions of Sherburne and Wright counties do not participate in the Regional Solicitation since they are covered by a separate process through MnDOT by agreement.

Planning area demographics

Figure 24 displays the BIPOC population share by census block group within the metropolitan planning area. Of the estimated 3.2 million people living in the seven-county planning area, about 30.4 percent are BIPOC. BIPOC populations are most concentrated in Hennepin and Ramsey counties. However, areas with a large proportion of BIPOC residents exist throughout the region.

Low-income populations by census block group within the planning area are shown in Figure 25. In the aggregate, 17.4 percent of the planning area population is considered low-income (i.e. living in a household making under 185 percent of the U.S. Census Bureau poverty threshold). Low-income populations are concentrated in Hennepin and Ramsey counties but present throughout the metro.

Figure 24: BIPOC Population within the MPO Planning Area

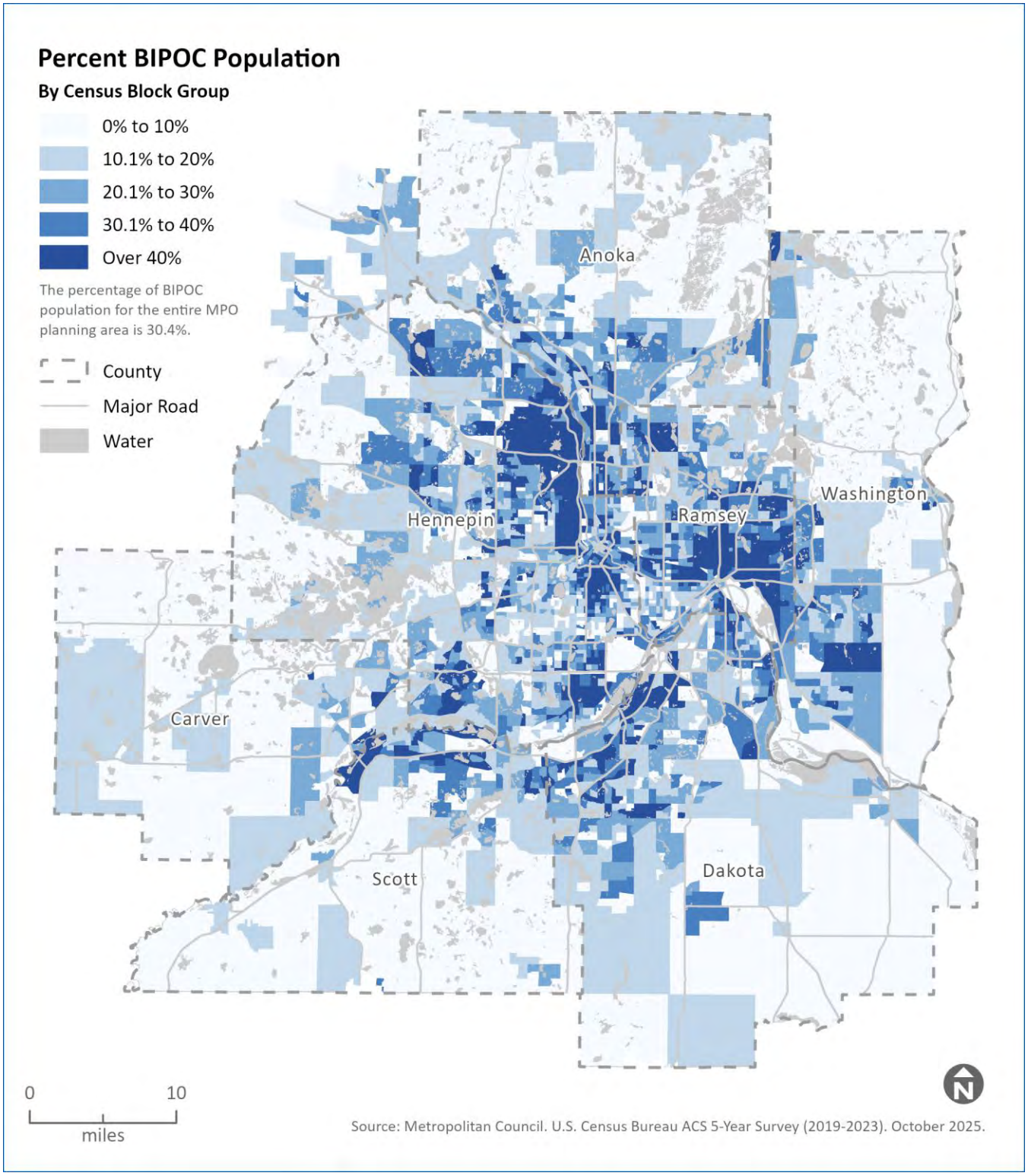
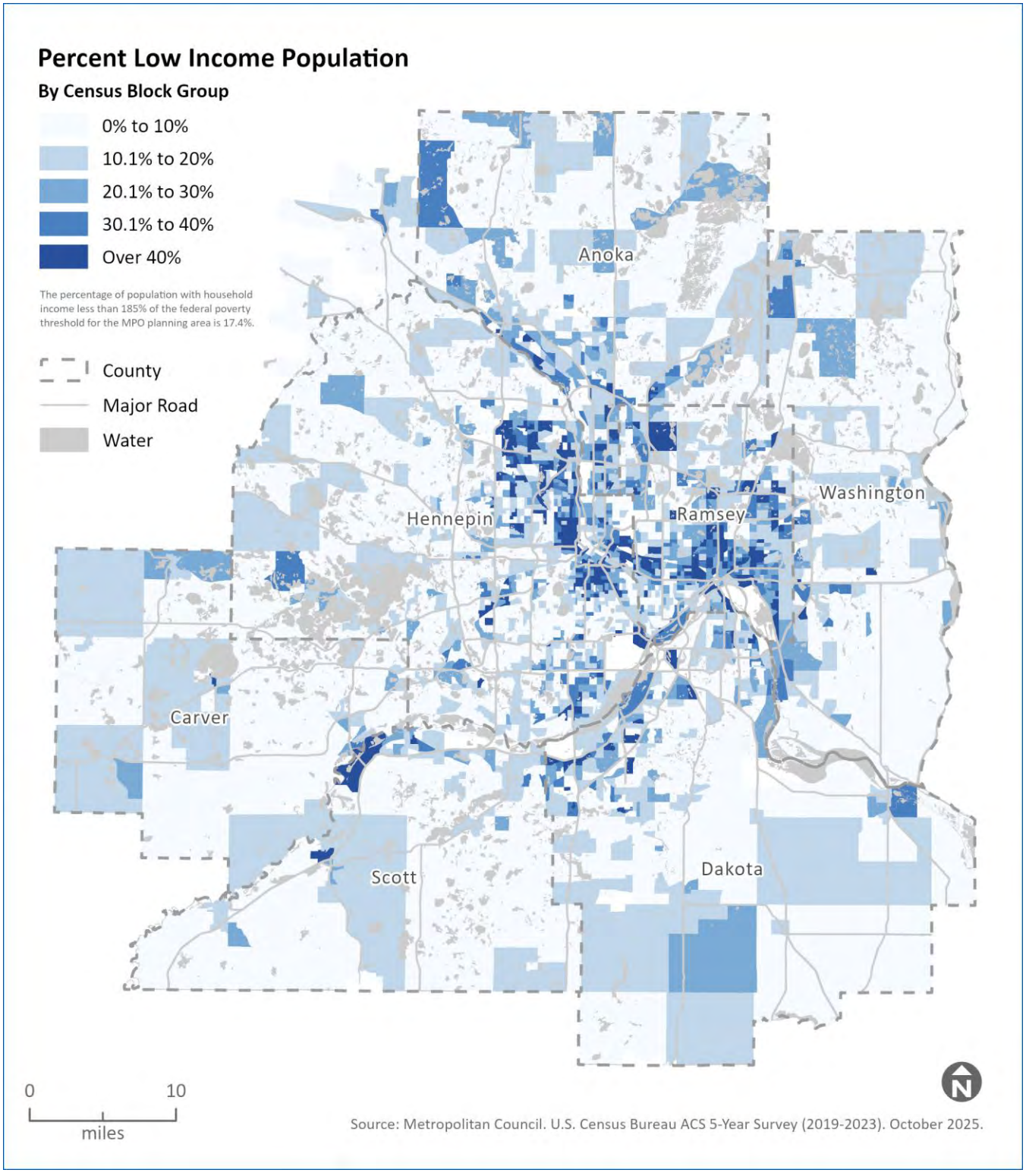


Figure 25: Low-Income Population within the MPO Planning Area



Incorporation of Title VI principles in regional planning

Many of the strategies used by the Metropolitan Council to ensure the incorporation of Title VI principles in regional planning are documented in the 2050 Transportation Policy Plan, which is one part of the comprehensive regional long-range plan *Imagine 2050*.

Title VI principles are further reflected in the policies and actions detailed in the plan, as well as a spatial analysis of planned transportation investments in relation to different populations.

The Metropolitan Council's Public Engagement Plan (Attachment C) 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 LEP populations. This process ensures that members of these communities are provided with opportunities to participate in the transportation planning process.

Distribution of state and federal funds

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

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

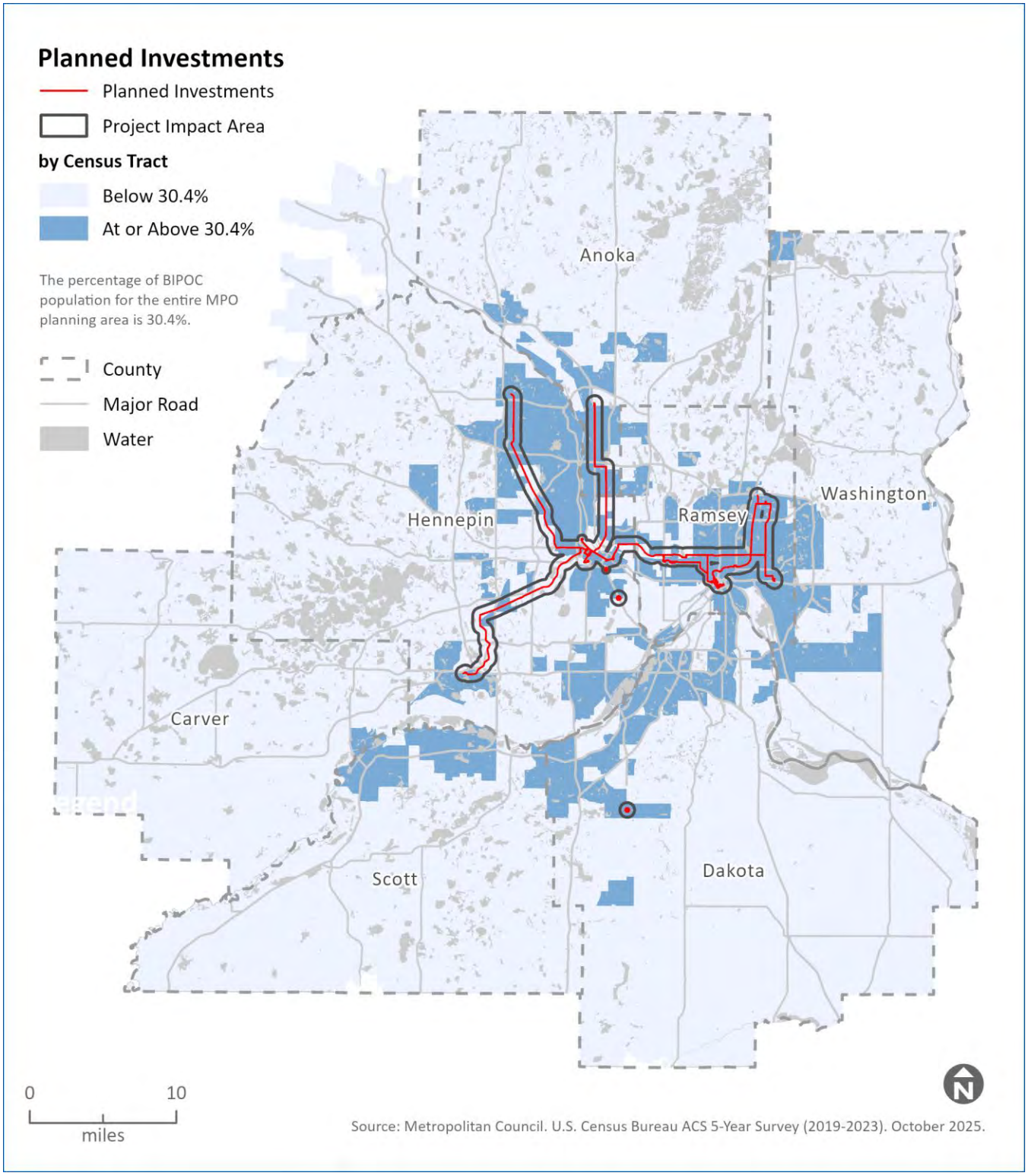
The distribution of state and federal funds in the aggregate for public transportation purposes within the MPO planning area was analyzed using funding levels for transit projects included in the Metropolitan Council's 2026-2029 TIP. The source of funds allocated to these projects include FTA Sections 5307 and 5339 formula funds, FTA Sections 5337 and 5309 discretionary funds, and Federal Highway Administration (FHWA) Congestion Mitigation and Air Quality (CMAQ) and Surface Transportation Block Grant (STBG) program funds.

The analysis used projects for which a project service area could be defined. For example, a light rail project's service area was defined as a half-mile around the proposed alignment; improvements to a local bus corridor were assigned a quarter-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 2026-2029 TIP was assigned a service area, which was overlaid on census tracts (Figure 26). 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 2026-2029 TIP public transportation projects were then summed for each census tract. Where a project's service was distributed across more than one census tract, the total budget for that project was divided among census tracts according to the percentage of the service area they intersected.

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 30.4 percent. 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.

Figure 26: 2026-2029 TIP Projects and Percent BIPOC Population



Results

Results of the funding distribution analysis are displayed in Table 18 and Table 19. There are 797 census tracts in the MPO planning area; on average, they receive approximately $1.3 million of project funding from 2026-2029 TIP transit projects (Table 18). Within the MPO planning area, there are 313 predominantly BIPOC tracts; on average, they have $2.0 million in funding investment, which is greater than the 484 non-BIPOC tracts' average of $0.9 million.

The ratio between predominantly BIPOC tracts and predominantly non-BIPOC tracts in terms of average cumulative project funding is 2.2; this is well above the 0.90 threshold that the Metropolitan Council considers 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 18: 2026-2029 TIP Funding Distribution by Predominantly BIPOC and Non-BIPOC Areas (MPO-wide)

Census Tracts in MPO Planning Area	Average Cumulative Project Funding	Comparison Index
All tracts (n=797)	$1,312,280	2.20
Predominantly BIPOC (n=313)	$1,963,667	
Predominantly non-BIPOC (n=484)	$891,031	

Not all census tracts in the MPO planning area are served by transit. With this in mind, the analysis was repeated to include only census tracts impacted by projects receiving funding for public transportation purposes.

On average, predominantly BIPOC tracts received approximately $4.9 million, while predominantly non-BIPOC tracts received $8.1 million (Table 19). The resulting funding ratio of 0.60 is below the threshold of 0.90. Thus, the results suggest a potential for disparate impact to BIPOC populations from the distribution of state and federal funding for public transportation purposes. A closer look at the projects in the TIP suggests that this is primarily due to the large budget for the Green Line Extension light rail project, which represents about 44 percent of the total four-year spending plan and travels primarily through non-BIPOC census tracts. While the Green Line Extension serves primarily non-BIPOC census tracts, it connects to the existing METRO Green Line which does serve a number of primarily BIPOC census tracts. The projects will provide enhanced, all-day service connecting suburban jobs centers to more diverse urban populations.

Table 19: 2026-2029 TIP 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 tracts (n=179)	$5,842,943	0.60
Predominantly BIPOC (n=126)	$4,877,998	
Predominantly non-BIPOC (n=53)	$8,136,964	

Distribution of FTA funds to subrecipients

As the MPO of the Minneapolis-Saint Paul metropolitan area, one of the Metropolitan Council's functions is to allocate formula funding to subrecipients and/or pass through competitive federal funds. The process for this is known as Regional Solicitation. The Regional Solicitation includes criteria that directly address Title VI principles in the scoring of transportation projects. Doing so further solidifies Metropolitan Council's role in assuring that transportation investments do not result in disparate impact or disproportionate burden to BIPOC and low-income residents, respectively. In 2025-2026, the Regional Solicitation process is undergoing a redesign to align with current guidance and plans.

390 Robert Street North
Saint Paul, MN 55101-1805

651-602-1000
TTY 651-291-0904
public.info@metc.state.mn.us
metrocouncil.org

Follow us on:

Bluesky: @metcouncilmn.bsky.social

Facebook: Metropolitan Council

Instagram: @metcouncilnews

LinkedIn: Metropolitan Council of

the Twin Cities



Attachment A: Title VI Notices

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.

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.

ဝန်ဆောင်ကော် ဂြကးတက်ကရ ၊ ကရိုးအိုဉ် ီ းအတယ်ာ် ဆတ်မ ၊ ်ီ ဆတ်ရ် ် ဂြတ်ကျ် ် ၊ လ ၊ အဘဉ်ထ ့ ် ် ်ီ ကလုပ်ဖ် ် ယ ဂြ သ ့ ် ် ဂြဆ ် ဆ ် ဆ ် ကလုပ်အလ ့ ် ် ိ ် ကလုပ်အထ ့ ် အ ် း ဆ ် ကျ ၊ ဆ ် ကျိုး ့ ၊ ဖ ် နမ့်အ ် ဉီဆ ် ် ်ထ ် ဂြတ်ာ်တဉ် ် ယ ဆတ်ထ ် ဂြတ်ကမ်တက်ာ်လ ၊ အတမ့်တ ် တ ် မ့်တမ့်အ ် ဉ် ် အ ၊ လိမ ၊ နှ်ပ ၊ ်တက်ာ်ခီဉ်သ့ဉ်– နှ ် က ် ်လင–ဘဉ် ် ယ အ့ိလ ၊ နကသ့မ ၊ ပ ့ ် မအ ် ၊ နှ ဂြလ ် ၊ .

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

METROPOLITAN COUNCIL

Metro Transit
a service of the Metropolitan Council

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.

Method	Description
Background information	Create content for websites, fact sheets, presentations, and other materials
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	The Transportation Policy Plan sets policies and investment guidance for the regional transportation system, based on the goals and objectives in Thrive MSP 2040, the region's development guide. The transportation plan is one of three major systems plans that result from Thrive MSP 2040. It also responds to federal planning guidance provided in the Moving Ahead for Progress of the 21st Century Act, known as MAP-21. The Transportation Policy Plan reflects a combination of technical analysis and policy discussion. The plan builds on Thrive MSP 2040 and its extensive public engagement process, on previous regional transportation plans, studies of significant regional transportation issues, discussion and feedback from policymakers throughout the region, and ideas and feedback from other regional stakeholders.	Every transportation-related planning study has an engagement component. That feedback and guidance also influences any updates to the regional transportation policy plan. A minimum public comment period of 45 calendar days shall be provided before the initial or revised plan is adopted.
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 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.	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. 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.

Plans or program	Description	Public participation considerations
Transportation Improvement Program	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 federal formula funds programmed by the Minnesota Department of Transportation, the Met Council and transit providers.	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. 1. The Met Council will coordinate with Minnesota Department of Transportation to work toward a 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	The Federal Clean Air Act Amendments passed in 1990 stipulate that transportation plans, programs, and projects in non-attainment and maintenance areas must undergo an air quality conformity analysis. The U.S. Environmental Protection Agency designates the seven-county metropolitan area and a developed portion of Wright County adjacent to the metropolitan area (along U.S. Highway 10 and I-94), as a maintenance area for carbon monoxide emissions. Therefore, transportation plans, projects, and programs are subject to air quality analysis.	

Plans or program	Description	Public participation considerations
Transportation Public Participation Plan	This Transportation Public Participation Plan establishes a framework for the region's stakeholders to influence both long-term transportation policy development and short-term transportation programming. It details the methods and strategies that the Metropolitan Council will use to engage the wide range of stakeholders, from policymakers, to business interests, to residents of the region. It will be updated when the Met Council updates public engagement policy, as well as at least once every five years.Plans for specific planning studies and related transportation planning efforts will also be created, consistent with this plan.	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	• 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	Thrive MSP 2040, Public Engagement	• Method engaged underrepresented

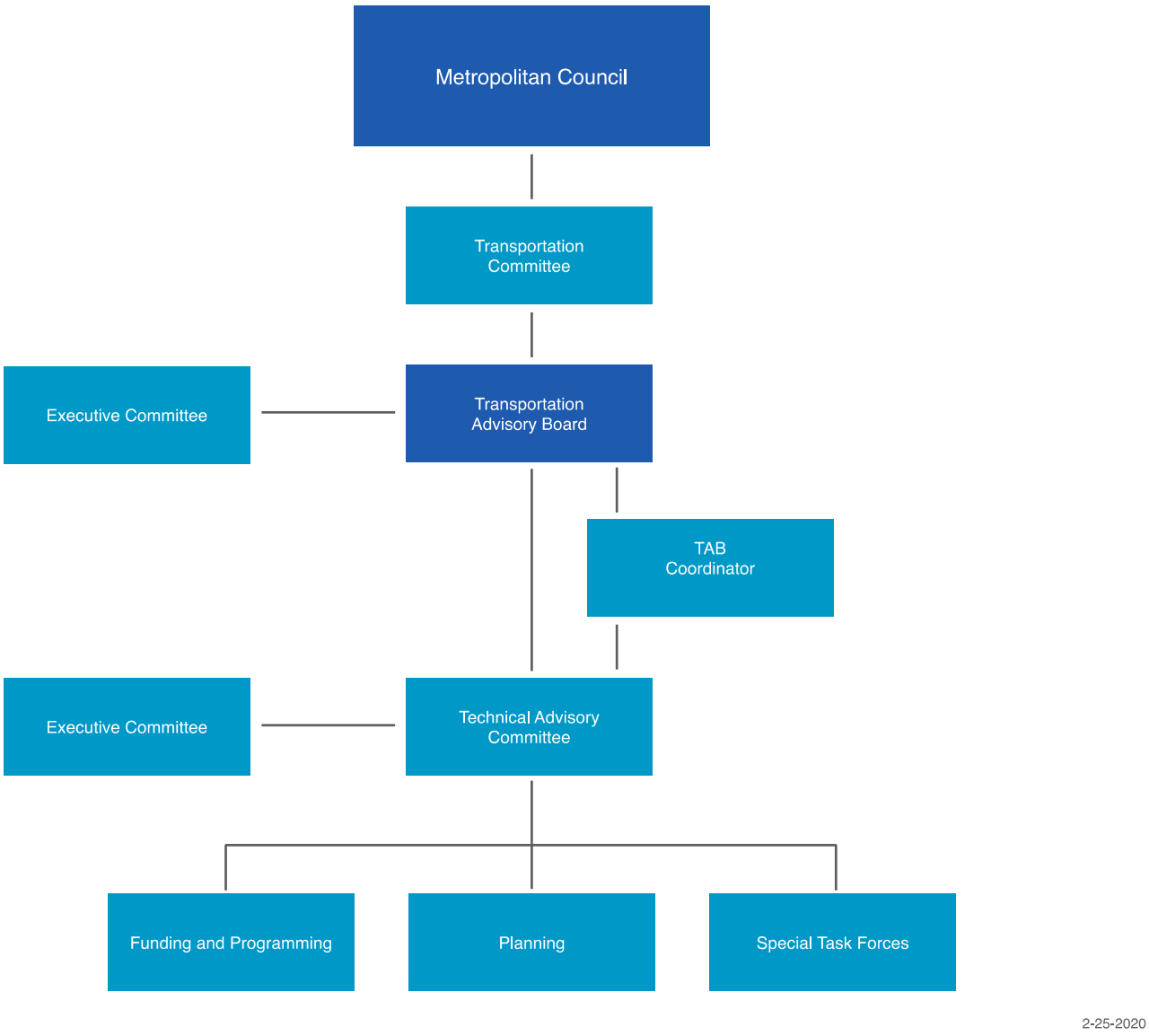
Goal/Outcomes	Policy	Method of Evaluation of Effectiveness
principles that are collaborative in nature and includes many perspectives of the region	Plan	communities throughout the region • All meetings are scheduled to meet the needs of community • Online engagement tools and other products are accessible to everyone
Building new relationships and leveraging existing ones	Thrive MSP 2040, Public Engagement Plan	• Existing relationships with partners and stakeholders are deepened with the Met Council • New relationships are formed within transportation and other sectors
Augment and amplify outreach and engagement goals	Thrive MSP 2040, Public Engagement Plan	• 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	• 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.



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 *metrocouncil.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 LANGUAGE ASSISTANCE PLAN

January 2026



METROPOLITAN COUNCIL

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

Metropolitan Council Members

Robin Hutcheson	Chair	Diego Morales	District 9
Judy Johnson	District 1	Peter Lindstrom	District 10
Reva Chamblis	District 2	Gail Cederberg	District 11
Tyronne Carter	District 3	Mark Jenkins	District 12
Deb Barber	District 4	Chai Lee	District 13
John Pacheco Jr.	District 5	Toni Carter	District 14
Robert Lilligren	District 6	Victor Obisakin	District 15
Yassin Osman	District 7	Wendy Wulff	District 16
Anjuli Cameron	District 8		



The Metropolitan Council is the regional planning organization for the seven-county Twin Cities area. The Met 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.

On request, this publication will be made available in alternative formats to people with disabilities. Call Metropolitan Council information at 651-602-1140 or TTY 651-291-0904.

Table of Contents

About the Metropolitan Council **1**

Metro Transit 1
Other Transportation Services 1

Purpose **2**

Responsibilities **2**

Authority **3**

I. Four-Factor Analysis **4**

Factor 1: Identification of the Number & Proportion of Persons with Limited English Proficiency in the Service Area 4
Factor 2: The Frequency of Contact Between Populations with Limited English Proficiency and the Council's Transportation Services 6
LEP Population Distribution 6
Call Center Data 12
Supplemental Information 13
Metro Mobility 13
Factor 3: Nature and Importance of Transportation Services for LEP Customers 14
Factor 4: Resources Available and Cost of Providing Language Assistance Services 15
Metro Transit Website 15
Fare Machines 16
Interpretation Services 16
Translated Materials 16
Outreach Coordinators 16

II. Current Language Assistance Measures **17**

Current LEP Outreach 18
Metro Transit Webpage 18
Language Line 18
Advertising with Multilingual Media 18
Outreach Coordinators 18
Rider Surveys 19
Future Strategies to Better Serve LEP Customers 19

III. Staff Training **20**

IV. Monitoring and Updating the Language Assistance Plan **21**

Appendix A **1**

Maps of LEP Population Distribution by Language 1

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 such as Metro Transit's bus and rail system, Metro Transportation Services, Metro Mobility, Transit Link, wastewater treatment services, regional parks, planning, affordable housing, to name only a few. These essential services and infrastructure support communities and businesses to ensure a high quality of life for all residents.

Metro Transit

Metro Transit is an operating division of the Metropolitan Council. It is one of the country's largest transit systems, and an established leader in the transit industry. Metro Transit is the primary public transportation operator in the Minneapolis-Saint Paul area and the largest operator in the state. Metro Transit runs an integrated network of buses, light rail transit, and microtransit, as well as resources for those who carpool, vanpool, walk, or bike, providing roughly 85 percent of the transit trips taken annually in the Twin Cities. In 2024, Metro Transit served 47.5 million bus and rail passengers with award-winning, energy-efficient fleets.

Metro Transit operates the METRO Green Line LRT, METRO Blue Line LRT, 95 bus routes, and more recently, Metro micro. In the last three years, Metro Transit opened the Gold Line fixed-guideway Bus Rapid Transit (BRT) and the B and E arterial BRT lines. Several more BRT lines and extensions to the Green and Blue lines are in development as Metro Transit seeks to expand its METRO network. Metro Transit also launched Metro micro, an on-demand shared ride service operating in North Minneapolis, Roseville, Woodbury, Bloomington, and Blaine. 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 contracted fixed routes and such services as Metro Mobility and Transit Link.

MTS contracted fixed routes are operated by private transit providers using Metropolitan 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, 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 those unable to use Metro Transit. For example, 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 (ADA). Services are offered to eligible customers that are physically unable to access the regular fixed route bus; unable to navigate regular fixed route bus systems once they are on board, or if they are unable to board and alight from 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 services are infrequent or unavailable. Transit Link is for trips that cannot be completed on regular transit routes alone and may require combining regular routes and Transit Link service. Anyone may reserve a Transit Link ride for any purpose, subject to availability.

Purpose

The following document serves as the Title VI Limited English Proficiency Language Assistance Plan for Metropolitan Council's Metro Transit, Metro Mobility, and Transit Link services. This document demonstrates the Metropolitan Council's commitment to provide meaningful access to all individuals accessing its 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 Metropolitan Council. LEP community members and advocates can refer to this plan to learn about the Metropolitan 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.

For further questions regarding this plan, please contact:

Shirin Edwin, Title VI Administrator, Office of Equity and Equal Opportunity
390 Robert Street, Saint Paul, MN 55101
651-602-1713
Shirin.edwin@metc.state.mn.us

Responsibilities

The Metropolitan Council's Regional Administrator has designated the 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 subrecipients covered under Title VI to ensure that they satisfy their LEP requirements. The Office of Equity and Equal Opportunity (OEEO) is designated as the lead department for LEP initiatives to assist the Language Assistance Liaison in ensuring that the Metropolitan 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.

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:

I. Identifying Populations with limited English proficiency who need language assistance
II. Providing language assistance measures
III. Training staff
IV. Providing notice to LEP persons
V. Monitoring and updating the plan

I. Four-Factor Analysis

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. This requirement includes the following Four-Factor Analysis:

- Factor 1: Identifying the number or proportion of LEP persons served or encountered in the recipient's service area;
- Factor 2: Determining the frequency with which Populations with limited English proficiency come into contact with the recipient's services;
- Factor 3: Determining the nature and importance of the services to LEP people; and
- Factor 4: 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. Metro Transit has addressed the federal requirements for assessing needs and providing services to Populations with limited English proficiency (LEP) by conducting an LEP needs assessment based on the Four-Factor Analysis, as outlined in FTA Circular 4702.1B.

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.

Factor 1: Identification of the Number & Proportion of Persons with Limited English Proficiency in the Service Area

DOT's guidance on the identification of LEP persons in the service area states that "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."

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 ages 5 and older. The 2019-2023 ACS provides quantitative information regarding LEP populations for the seven-county region and Metro Transit's service area. An analysis of these data identified LEP populations and their language characteristics within the Metro Transit service area.

ACS data indicate that the total population ages 5 and older within Metro Transit's service area is 2,079,039. Approximately 23 percent of the population speaks a language other than English at home (387,478). Of people who speak a language other than English at home, 39% (151,582) speak English less than "very well." Therefore, the overall LEP population is 7 percent of the total population ages 5 and older 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 percent) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance."

Table 1 lists LEP populations within Metro Transit's service area according to the twelve foreign language classifications contained in the 2019-2023 ACS at the tract level. No languages have LEP populations that exceed 5 percent of the total population in the service area. Nine of the twelve language classifications have LEP populations over 1,000. Fewer than 1,000 LEP persons speak Tagalog or German, so those two languages are not considered further for translation of vital documents.

Table 1: LEP populations residing in the Metro Transit service area

Language or Language Group	LEP Population	% Total LEP	% Total Population
All Languages	***151,582***	***100.0%***	***7.3%***
Spanish	45,025	29.7%	2.2%
Other Asian and Pacific Island languages	40,905	27.0%	2.0%
Other and unspecified languages	33,763	22.3%	1.6%
Vietnamese	7,482	4.9%	0.4%
Other Indo-European languages	5,479	3.6%	0.3%
Chinese (incl. Mandarin, Cantonese)	4,974	3.3%	0.2%
Russian, Polish, or other Slavic languages	4,189	2.8%	0.2%
French, Haitian, or Cajun	4,002	2.6%	0.2%
Arabic	3,145	2.1%	0.2%
Korean	919	0.6%	0.0%
Tagalog (incl. Filipino)	905	0.6%	0.0%
German, other West Germanic languages	795	0.5%	0.0%
Total Population 5 Years and Older:	**2,079,039**		

Factor 2: 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 (MDE), Language Line usage and other supplemental data.

LEP Population Distribution

Using the language categories contained in the 2019-2023 ACS, Metro Transit mapped the concentrations of LEP communities within the service area. Results of the geographic distribution indicate the greatest densities of LEP populations 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 Saint Paul, central and north Minneapolis, and cities to the northwest and south of Minneapolis. LEP communities are also emerging in the eastern suburbs.

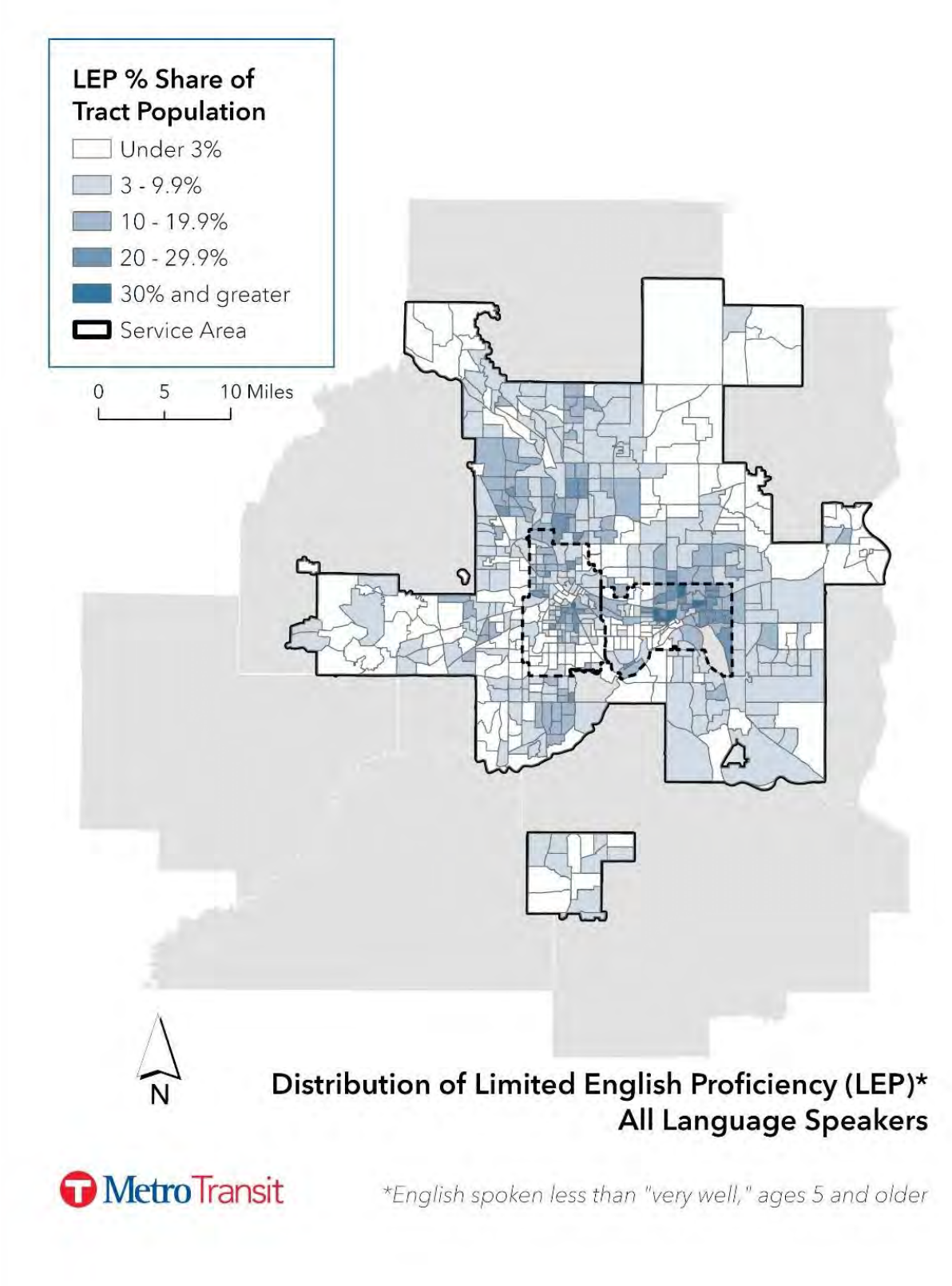


Figure 1: Distribution of LEP speakers, all languages (2019-2023 ACS)

Appendix Figures A1-A10 map the tract-level distribution of LEP populations in the service area for ten of twelve language classifications of the 2019-2023 ACS. Maps are not shown for Tagalog and German because LEP speakers comprise less than a 3% share of any tract population. For all other language classifications, the following maps indicate:

- LEP Spanish speakers have prominent populations in most areas of the metro, where the highest population shares are in central Minneapolis and in suburbs north of Minneapolis. Other prominent populations are in Saint Paul and suburbs south of Minneapolis and north and south of Saint Paul. (Figure A-1).

- LEP speakers of “other Asian and Pacific Island languages” have the highest population shares in central and east Saint Paul and suburbs north of Saint Paul. Prominent populations are also in north Minneapolis and suburbs northwest of Minneapolis (Figure A-2).

- LEP speakers of “other and unspecified languages” are dispersed throughout the metro, with the highest population shares in central Minneapolis and across Saint Paul (Figure A-3

- LEP Vietnamese speakers have prominent populations in dispersed areas including north Minneapolis, central Saint Paul, and suburbs to the north, northwest, east, and south (Figure A-4).

- LEP speakers of other Indo-European languages have prominent populations in dispersed areas including Saint Paul, suburbs north and east of Saint Paul, and suburbs north and west of Minneapolis (Figure A-5).

- LEP Chinese speakers have prominent populations near the University of Minnesota in Minneapolis and Saint Paul, in suburbs to the west and southwest of Minneapolis, and in suburbs east of Saint Paul (Figure A-6).

- LEP speakers of Russian, Polish, and other Slavic languages have prominent populations in west Saint Paul and suburbs west and north of Minneapolis (Figure A-7).

- LEP speakers of French, Cajun, and Haitian have prominent populations in central Minneapolis, suburbs west and northwest of Minneapolis, and suburbs south of Saint Paul (Figure A-8).

- LEP Arabic speakers have prominent populations in central Minneapolis and suburbs south and north of Minneapolis (Figure A-9).

- LEP Korean speakers have prominent populations in suburbs north of Saint Paul (Figure A-10).

A demographic analysis of areas near transit services and routes provides additional evidence of the likelihood of LEP populations interacting with Metro Transit service. Table 2 shows estimated LEP populations residing within one-quarter mile of Metro Transit stops and stations.

These estimates required mapping a quarter-mile buffer around active Metro Transit stops and stations, then calculating the share of each tract that falls within the buffer. That percentage was used to prorate the LEP populations of each tract. Figure 2 shows the extent of the buffered area, representing the approximate walkshed to access transit service. Note that several Metro Transit stops and stations fall outside the service area, but those locations are excluded from the analysis.

Table 2: Estimated LEP populations residing within one-quarter mile of Metro Transit stops and stations

Language or Language Group	LEP Population	% Total LEP	% Total Population
All Languages	**101,781**	**100.00%**	**9.0%**
Spanish	30,990	30.4%	2.7%
Other Asian and Pacific Island languages	28,613	28.1%	2.5%
Other and unspecified languages	25,091	24.7%	2.2%
Vietnamese	3,709	3.6%	0.3%
Other Indo-European languages	3,180	3.1%	0.3%
French, Haitian, or Cajun	2,730	2.7%	0.2%
Chinese (incl. Mandarin, Cantonese)	2,693	2.6%	0.2%
Russian, Polish, or other Slavic languages	1,982	1.9%	0.2%
Arabic	1,476	1.4%	0.1%
Tagalog (incl. Filipino)	509	0.5%	0.0%
Korean	459	0.5%	0.0%
German or other West Germanic languages	350	0.3%	0.0%
Total Population 5 Years and Older:	**1,127,289**		

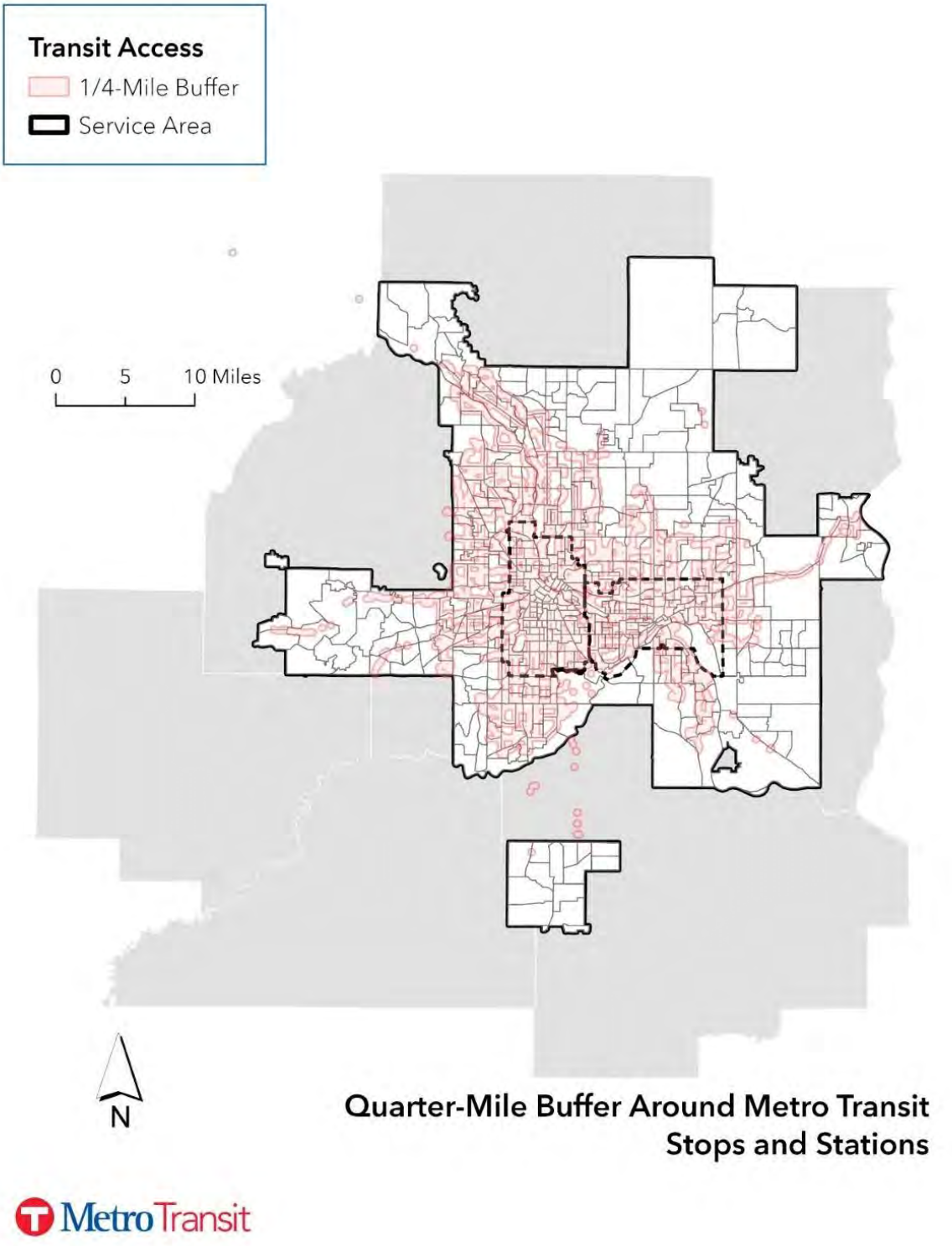


Figure 2: Quarter-mile buffer around Metro Transit Stops and Stations

Additional analysis of ACS data supplements our understanding of LEP populations likely to interact with transit, especially where other regional entities report disaggregated language data.

Disaggregated language data can be analyzed at a larger geographic level, called Public Use Microdata Areas (PUMAs). These statistical areas are limited to geographies containing at least 100,000 persons. In Minneapolis and Saint Paul where transit coverage is densest, each city conveniently contains several unique PUMAs within their boundaries. However, suburban cities with smaller populations are combined into geographically large PUMAs that vary widely in transit coverage. For the purpose of identifying additional unique languages spoken by at least 1,000 LEP persons, only analysis of the seven PUMAs within Minneapolis and Saint Paul illuminates is deemed necessary and useful. Table 3 details disaggregated languages reported at the PUMA level and their associated LEP populations in Minneapolis and Saint Paul.

Table 3: Estimated LEP populations residing within Minneapolis and Saint Paul PUMAs

Language	ACS Classification	LEP Population
All languages		***68,725***
Spanish	Spanish	19,572
Hmong	Other Asian and Pacific Island languages	15,275
Somali	Other and unspecified languages	11,108
Karen languages	Other Asian and Pacific Island languages	7,049
Amharic	Other and unspecified languages	2,295
Vietnamese	Vietnamese	1,318
Oromo	Other and unspecified languages	1,187
French	French, Haitian, or Cajun	1,164
Chinese	Chinese (incl. Mandarin, Cantonese)	1,042
Total Population 5 Years and Older	**739,657**	

MDE 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 4 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 2019-2023 ACS. Student enrollment data shows that Hmong, Karen, and Somali are languages with LEP populations above 1,000. While EL students who speak Hmong and Somali are enrolled widely across school districts, Karen-speaking EL students are primarily enrolled in school districts in and around Saint Paul.

Table 4: English Learner (EL) students (K-12) enrolled in school districts within the Metro Transit service area

Language	ACS Classification	Number of EL Students
Spanish	Spanish	17,774
Hmong	Other Asian and Pacific Island languages	5,487
Somali	Other and unspecified languages	3,619
Karen	Other Asian and Pacific Island languages	1,882
Oromo, Afan Oromo, Oromiffa	Other and unspecified languages	687
Arabic	Arabic	581
Amharic	Other and unspecified languages	440
Swahili, Kiswahili	Other and unspecified languages	367
Vietnamese	Vietnamese	347
Pashto	Other Indo-European languages	264
French	French, Haitian, or Cajun	252
Nepali	Other Indo-European languages	242
Russian	Russian, Polish, or other Slavic languages	236
Chinese, Mandarin	Chinese (incl. Mandarin, Cantonese)	222
Dari	Other Indo-European languages	212
English, Creolized	Other and unspecified languages	182
Tigrinya	Other and unspecified languages	160
Karenni, Kayah	Other Asian and Pacific Island languages	152
Ukrainian	Russian, Polish, or other Slavic languages	126
Karen, S'gaw	Other Asian and Pacific Island languages	103
Other languages <100 ELs	multiple	1,028

Call Center Data

Metro Transit Call Center interacts most commonly with individuals who primarily speak Spanish, Somali, and Russian. Between June 2024 and May 2025, the Call Center took 2,807 calls from customers seeking interpreter services. The breakdown is listed below in Table 5.

Table 5: Requests for Interpreters by Language, Metro Transit Call Center June 2024-May 2025

Language	Number of Calls
All Languages	***2,807***
Spanish	2,254
Somali	377
Russian	52
Vietnamese	28
Hmong	28
Arabic	21
French	15
Amharic	12
Tigrigna	6
Swahili	5
Oromo	3
Haitian Creole	2
Greek	1
Mandarin	1
Tibetan	1
Karen	1

Supplemental Information

Metro Transit reached out to several groups to learn more about which languages are spoken most often in the Twin Cities. The following responses were received:

- In April through June 2025, Ramsey County Human Services reported 2,808 residents requesting in-person interpreter services. The most requested languages were Somali (25%), Karen (25%), Spanish (20%), and Hmong (14%). Multiple additional languages comprised the remaining 16% of requests.

- The International Institute of Minnesota (IIMN) is among the leading providers of English language classes in the region. In 2025, IIMN reported 1,853 enrolled students who specified speaking a primary language other than English. Of 87 primary languages spoken by students, six are spoken among at least 5% of students: Spanish (22%), Somali (16%), Ukrainian (7%), French (7%), Amharic (6%), and Oromo (6%).

Metro Mobility

Metro Mobility management and staff report that contact with LEP persons is very infrequent. Staff reported that they occasionally (5-10 times per week) 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.

Factor 3: Nature and Importance of Transportation Services for LEP Customers

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.

If languages are spoken by LEP populations of at least 1,000 persons living near transit and by populations of at least 1,000 EL students, this is assumed to be strong evidence of meeting this threshold. These languages are:

- **Spanish**
- **Hmong**
- **Somali**
- **Karen**

In Table 6 summarizes other languages that do not meet these two initial criteria but were further considered to determine the likelihood of interaction with transit:

Table 6: LEP populations among other languages and interactions with services

Language	LEP Pop. near Transit	LEP Pop. Minneapolis-Saint Paul	MDE EL enrollment	IIMN enrollment	Metro Transit Call Center
Vietnamese	3,709	1,318	347	17	28
Other Indo-European languages	3,180	*<1,000*	264 (Pashto) or fewer	65 (Dari) or fewer	*0*
French	2,730	1,164	252	122	15
Chinese	2,693	1,042	222 (Mandarin)	62 (Mandarin)	1
Russian, Polish, and other Slavic languages	1,982	*<1,000*	236 (Russian) or fewer	138 (Ukrainian) or fewer	52 (Russian)
Arabic	1,476	*<1,000*	581	71	21
Tagalog	509	*<1,000*	*<100*	*N/A*	*0*
Korean	459	*<1,000*	*<100*	*N/A*	*0*
German	350	*<1,000*	*<100*	*N/A*	*0*

Among these nine languages or language groups, evidence is strongest that at least 1,000 LEP Vietnamese speakers interact with Metro Transit services and would benefit from vital document translation. Vietnamese is spoken by the largest LEP populations living near transit and in transit-rich Minneapolis and Saint Paul, received the most Call Center interpreter requests, and is highly represented among EL public school enrollment.

There is some evidence that at least 1,000 LEP persons speaking French, Arabic, or Chinese may interact with transit service. Since the previous Language Assistance Plan, LEP populations in the service area grew among French (+31%) and Arabic (+15%) speakers. In the same period, the population of LEP Chinese speakers shrank (-14%). LEP French-speaking communities are emerging in central Minneapolis and in the northwest suburbs; whereas LEP Arabic-speaking communities are shifting farther north away from the urban core. Chinese-speaking LEP communities continue to be most prominent near the University of Minnesota campuses in Minneapolis and St. Paul, most likely reflecting the international student population. Given the magnitude, pace, and limited geography of LEP population changes in the region, it is unclear that translating vital documents in these languages would meaningfully enhance transit access. Instead, projects should consider translating documents into these languages where geographical scopes include LEP populations.

Review of Korean, Tagalog, German, other Indo-European languages, and Russian, Polish, and other Slavic languages showed no individual languages demonstrating evidence of at least 1,000 LEP persons likely to interact with transit. 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.

Factor 4: Resources Available and Cost 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 Transit site.

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.

II. Current Language Assistance Measures

In providing language assistance services, the Metropolitan Council adheres to DOT's guidance that states, "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 Metropolitan Council's most widely-used transportation service. As a result, the Metropolitan Council focuses the majority of its LEP resources on Metro Transit and provides its most robust language assistance services in Spanish, followed by Hmong, Somali, Vietnamese, and Karen. However, the Metropolitan Council continues to make language assistance for other languages available on an as-needed basis.

The Metropolitan Council uses a variety of strategies to provide language assistance for customers with limited English proficiency, including:

- A variety of translated vital documents, including the Title VI Notice of Rights, Title VI complaint forms, service guides, and intake forms for reduced fare programs, fare information and user guides, notices of the availability of interpretation services and various marketing materials. More information can be found here:
    - Metro Mobility Translated Information
    - Transit Link Translated Information
    - Metro Transit Translated Information
- 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.

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 VI 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 and for Transit Link at transitlinktc.org.

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 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 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 work with a broad network of partner organizations that extends to approximately 100 organizations with each organization serving English language learners. This network is constantly growing as more partnerships are developed and maintained.

Since the last Title VI update, Metro Transit's Outreach Coordinators provided trainings to over 80 groups that serve customers with limited English proficiency. In total, Metro Transit's Outreach Coordinators estimate that they have reached hundreds of customers with limited English proficiency through such outreach efforts and partnerships.

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 LEP Customers

The Office of Equity and Equal Opportunity (OEEO) will continue to lead LEP initiatives for the Metropolitan 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 Metropolitan Council and Metro Transit staff. These groups help explore options, resources, and

opportunities for complying with Title VI. The Metropolitan 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.

III. Staff Training

According to LEP guidance provided by the DOT, "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.

IV. Monitoring and Updating the Language Assistance Plan

The Metropolitan Council conducts internal monitoring of its language assistance practices ensuring that the strategies employed remain effective to provide meaningful access to LEP persons. 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 into frequent contact.

The Metropolitan 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 Metropolitan 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.

Appendix A

Maps of LEP Population Distribution by Language

Figure A-1: Distribution of LEP Spanish Speakers (2019-2023 ACS)..... 2
Figure A-2: Distribution of LEP other Asian and Pacific Island language speakers (2019-2023 ACS)..... 3
Figure A-3: Distribution of LEP other and unspecified language speakers (2019-2023 ACS)..... 4
Figure A-4: Distribution of LEP Vietnamese speakers (2019-2023 ACS)..... 5
Figure A-5: Distribution of LEP other Indo-European language speakers (2019-2023 ACS)..... 6
Figure A-6: Distribution of LEP Chinese speakers (2019-2023 ACS)..... 7
Figure A-7: Distribution of LEP Russan, Polish and other Slavic language speakers (2019-2023 ACS)..... 8
Figure A-8: Distribution of LEP French, Cajun, and Haitian speakers (2019-2023 ACS)..... 9
Figure A-9: Distribution of LEP Arabic speakers (2019-2023 ACS) 10
Figure A-10: Distribution of LEP Korean speakers (2019-2023 ACS)..... 11

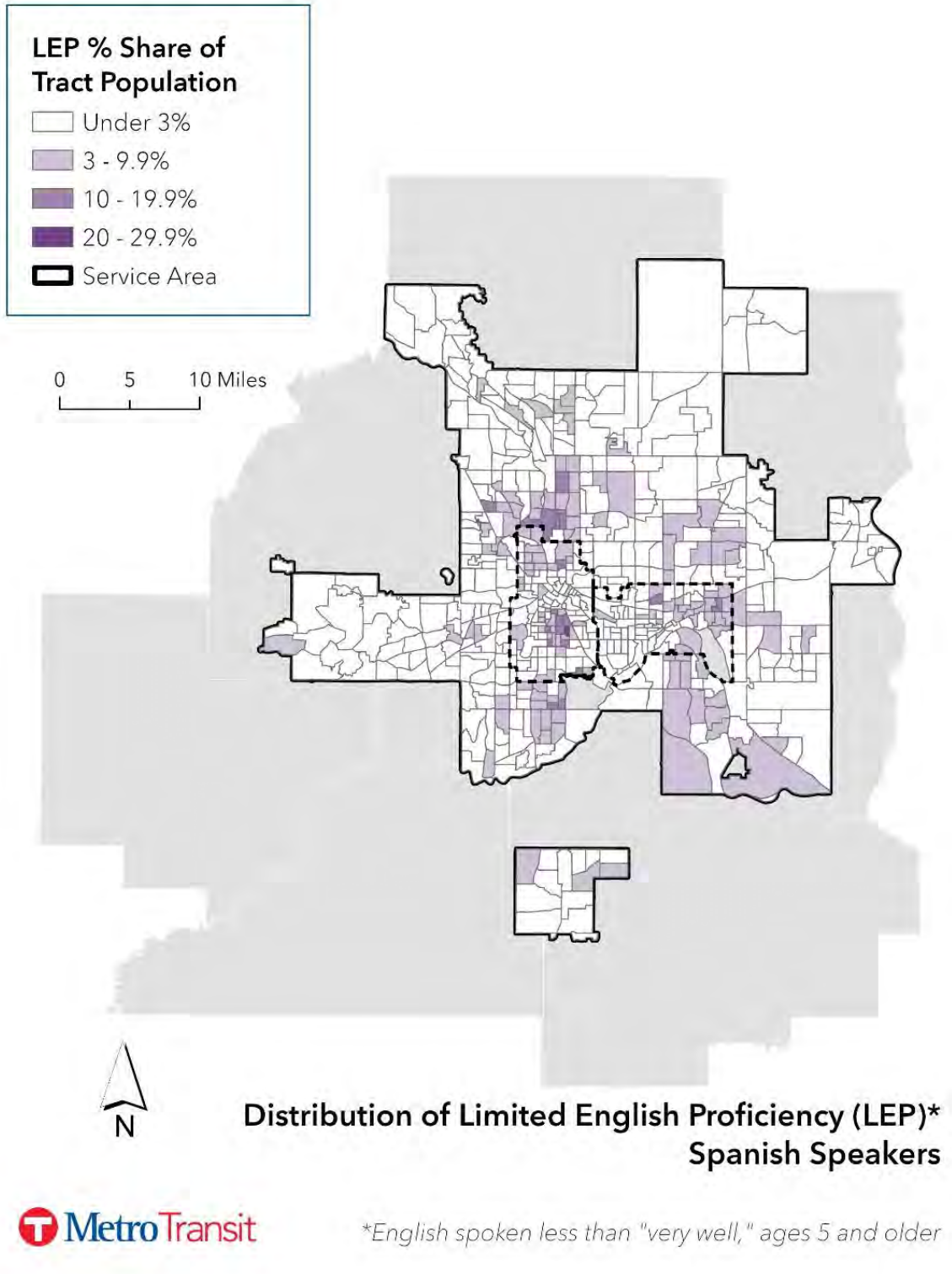


Figure A-1: Distribution of LEP Spanish Speakers (2019-2023 ACS)

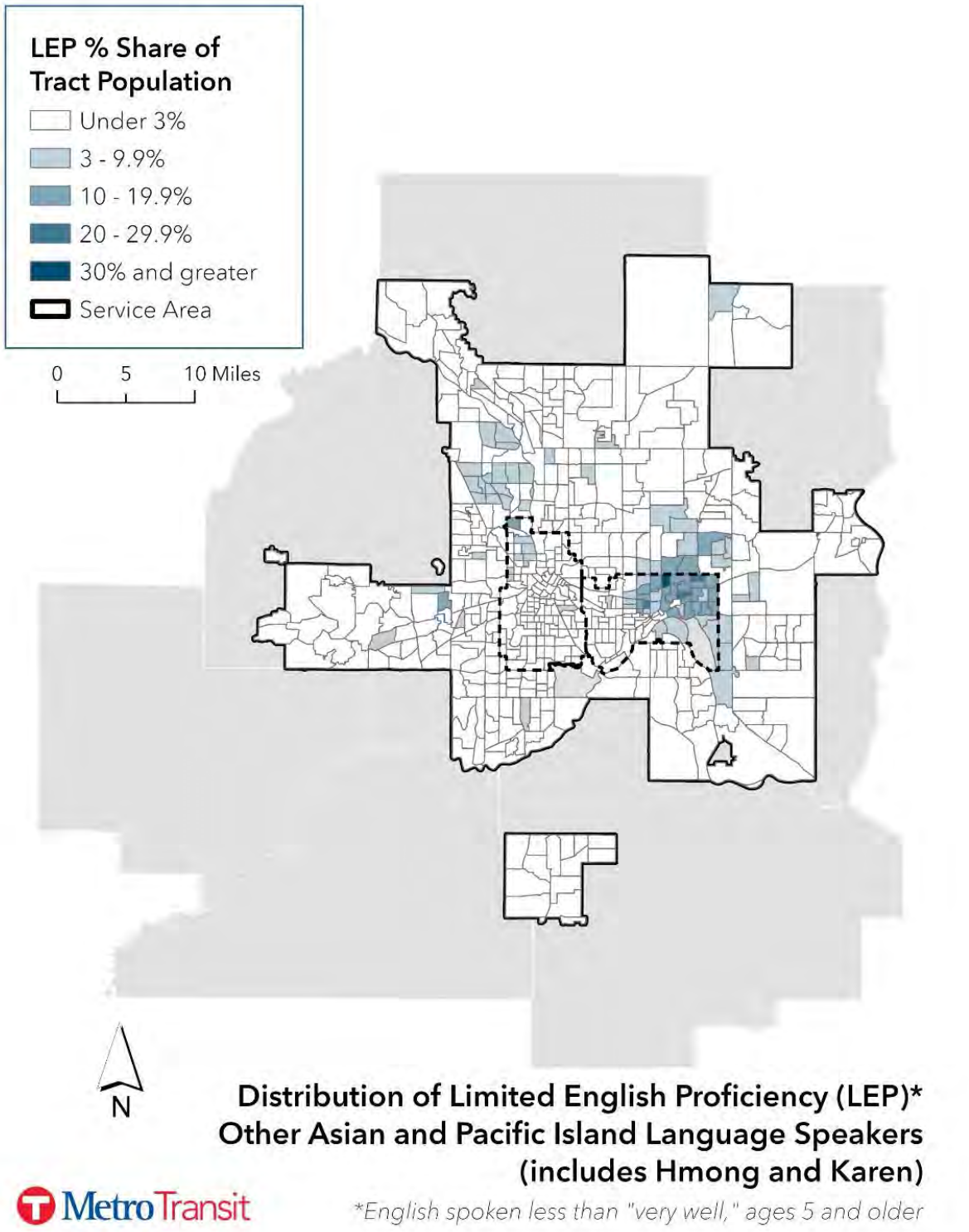


Figure A-2: Distribution of LEP other Asian and Pacific Island language speakers (2019-2023 ACS)

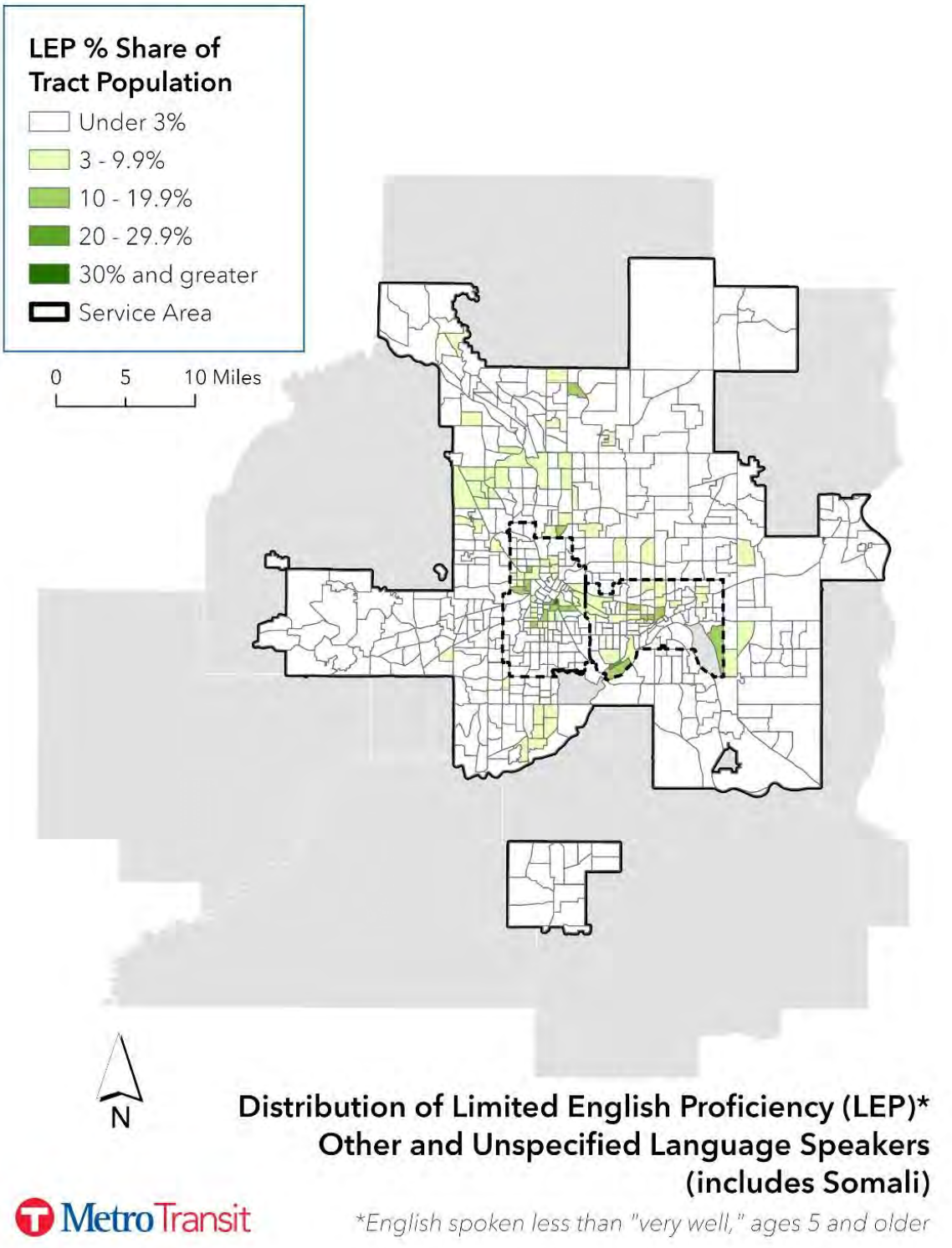


Figure A-3: Distribution of LEP other and unspecified language speakers (2019-2023 ACS)

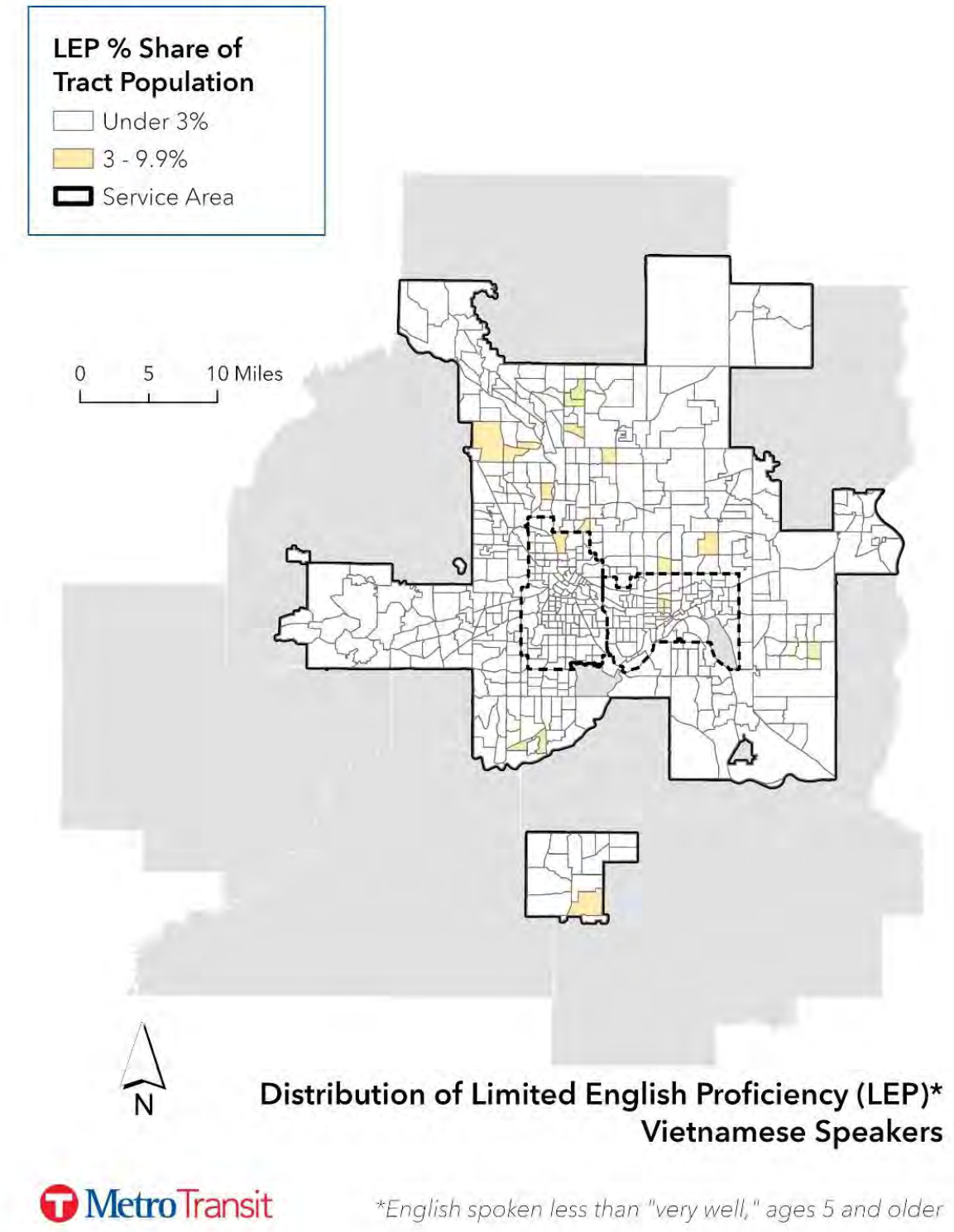


Figure A-4: Distribution of LEP Vietnamese speakers (2019-2023 ACS)

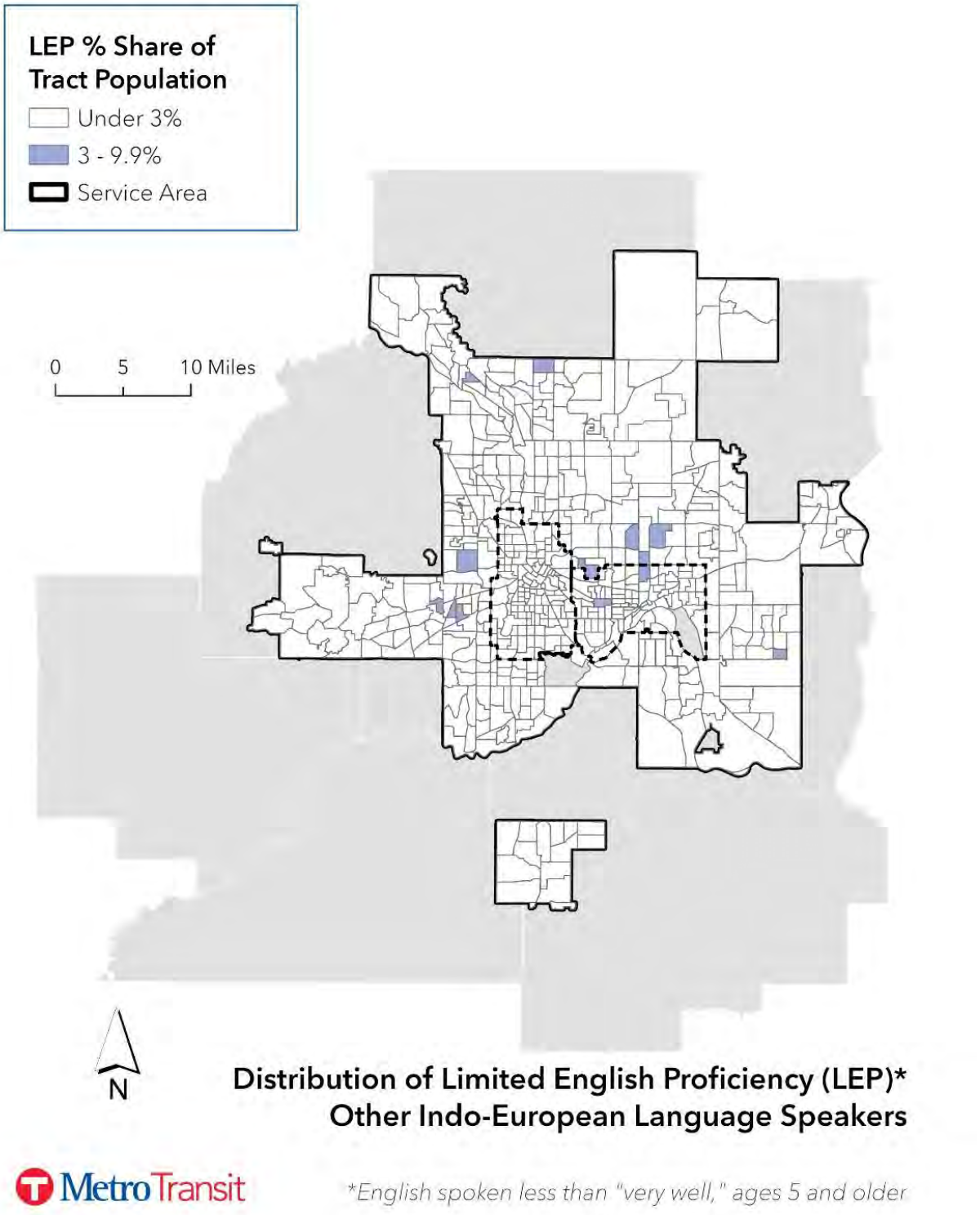


Figure A-5: Distribution of LEP other Indo-European language speakers (2019-2023 ACS)

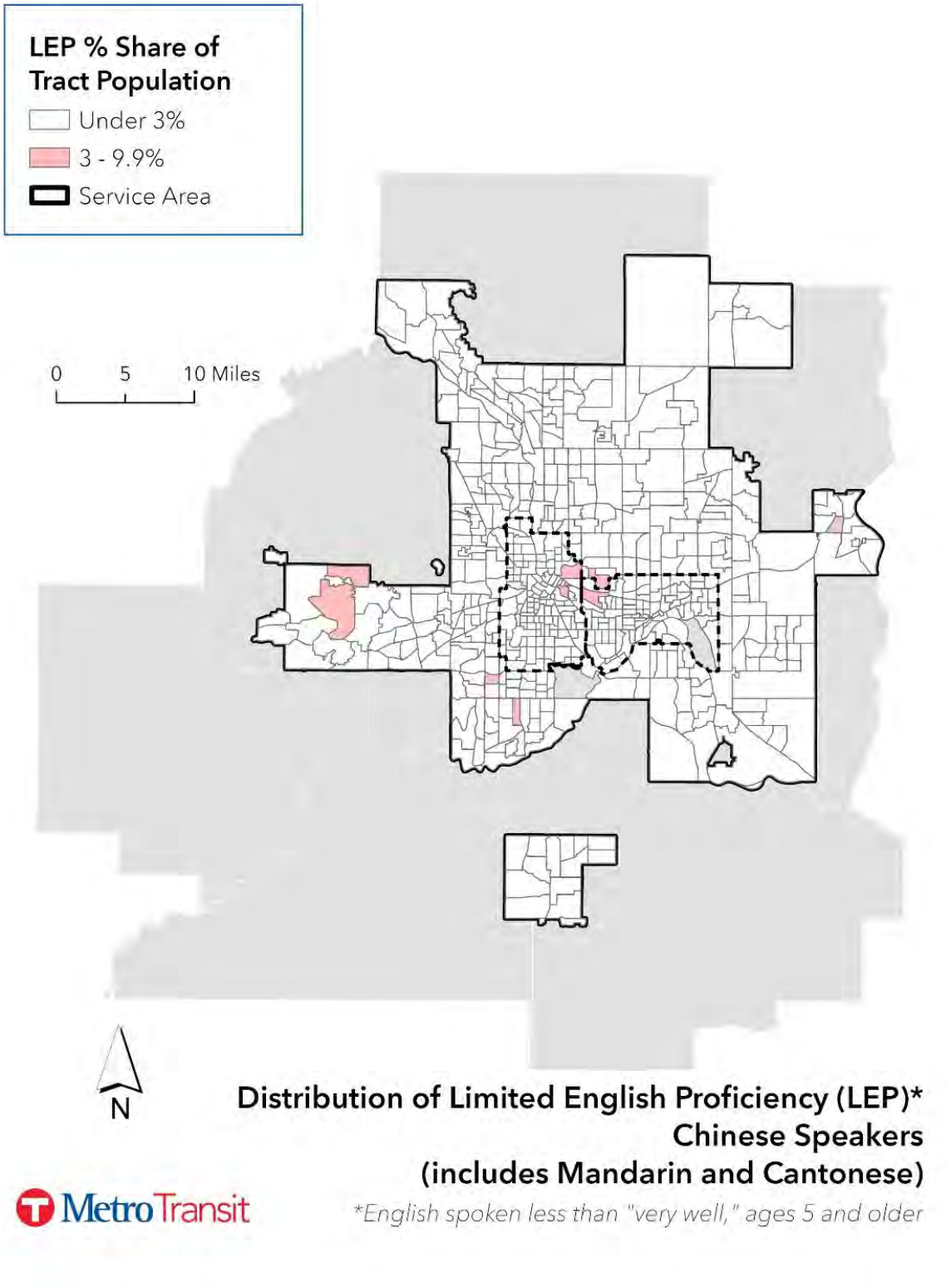


Figure A-6: Distribution of LEP Chinese speakers (2019-2023 ACS)

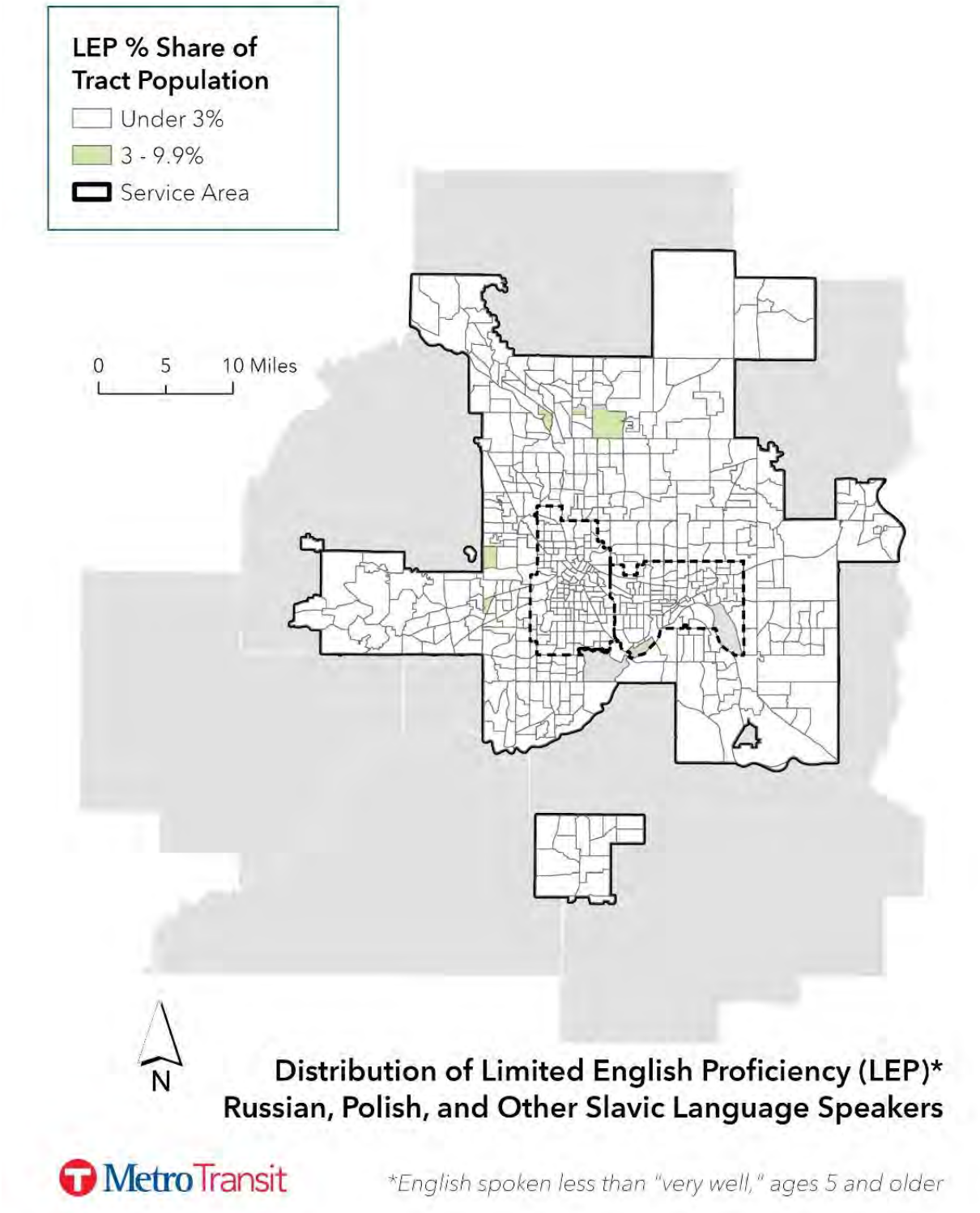


Figure A-7: Distribution of LEP Russan, Polish and other Slavic language speakers (2019-2023 ACS)

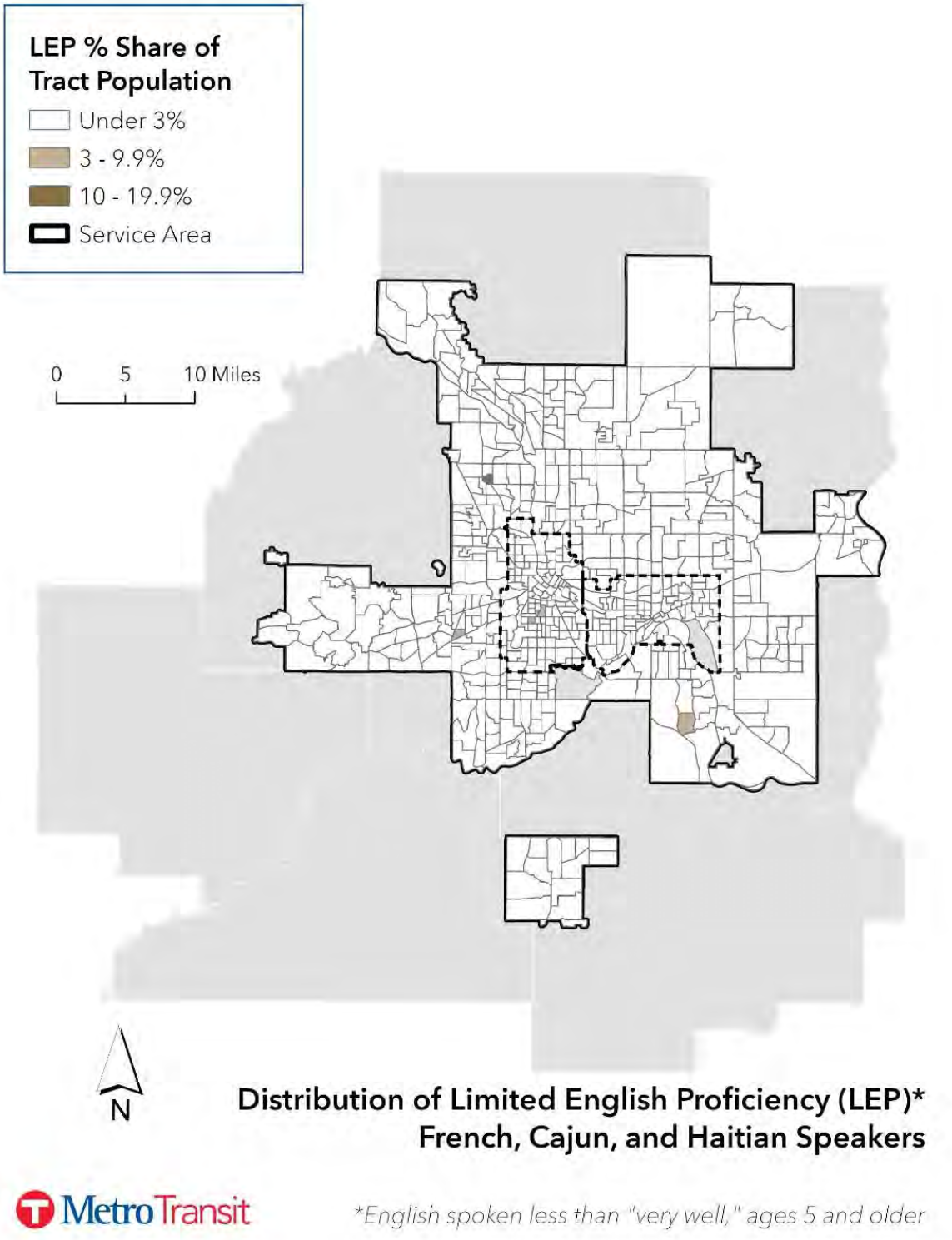


Figure A-8: Distribution of LEP French, Cajun, and Haitian speakers (2019-2023 ACS)

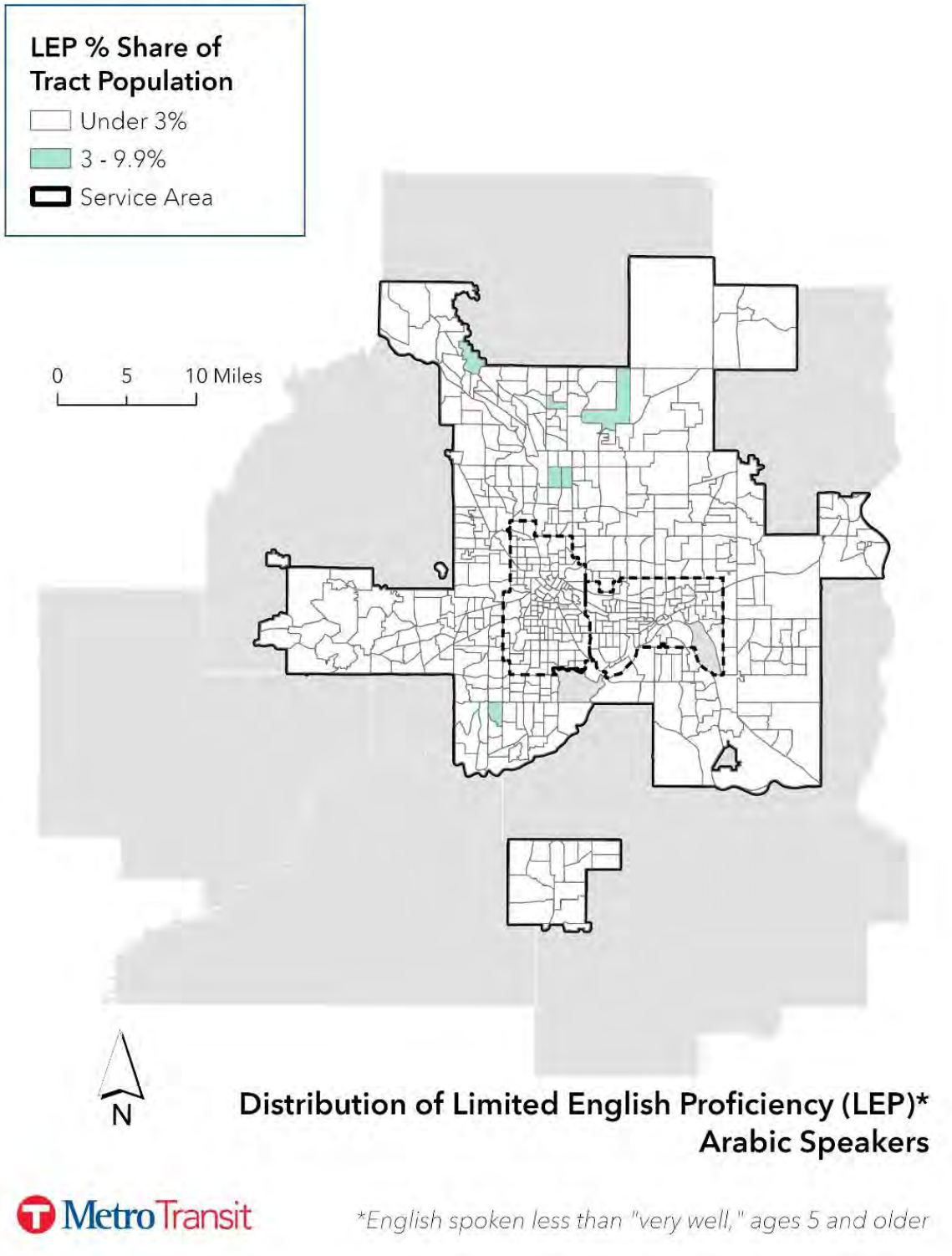


Figure A-9: Distribution of LEP Arabic speakers (2019-2023 ACS)

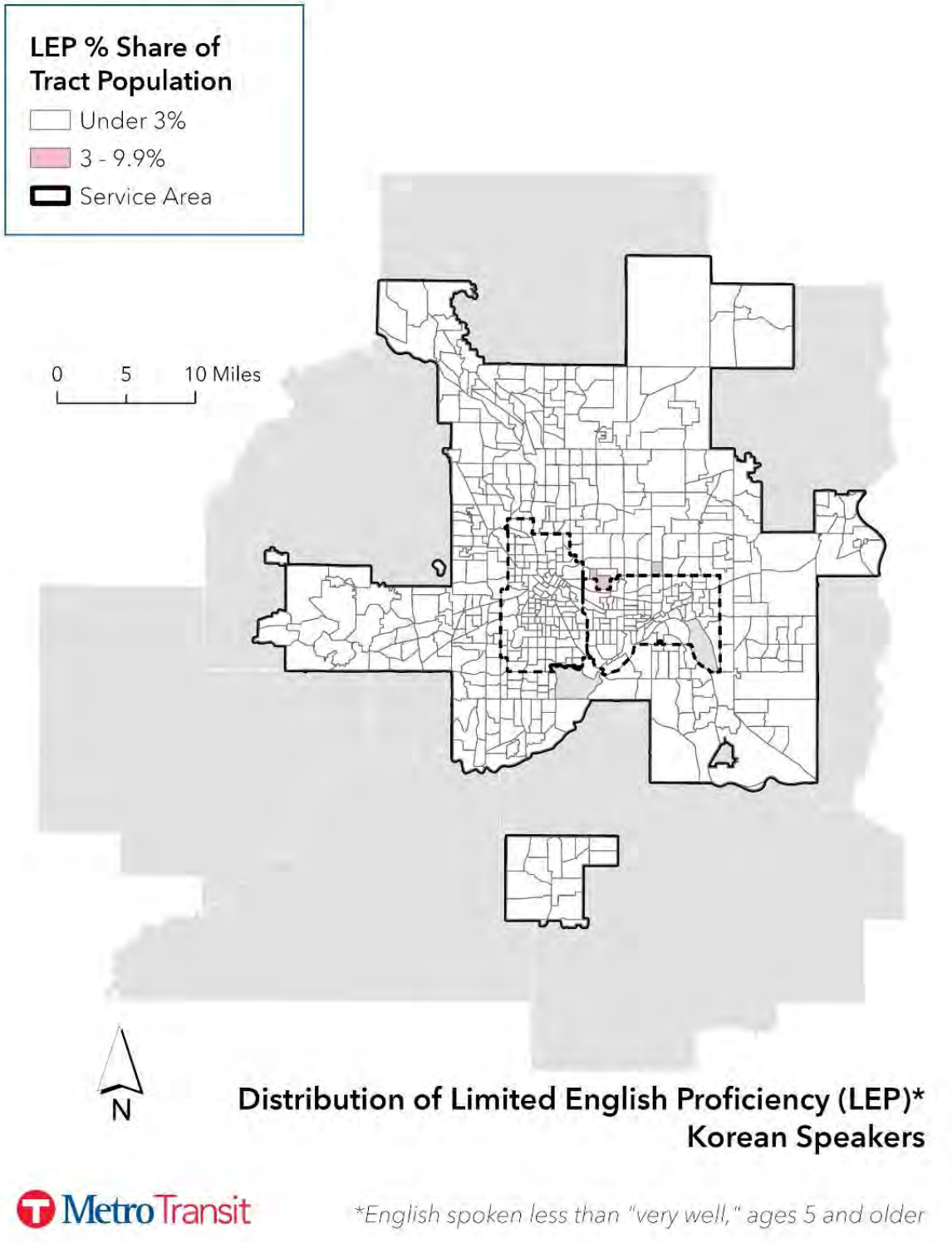


Figure A-10: Distribution of LEP Korean speakers (2019-2023 ACS)



390 Robert Street North
Saint Paul, MN 55101-1805

651-602-1000
TTY 651-291-0904
public.info@metc.state.mn.us
metrocouncil.org

Follow us on:
Bluesky: @metcouncilmn.bsky.social
Facebook: Metropolitan Council
Instagram: @metcouncilnews
LinkedIn: Metropolitan Council of the Twin Cities

Attachment F: Minutes Noting Metropolitan Council Approval of Title VI Policies

Minutes

Metropolitan Council

Meeting Date: October 26, 2022 **Time**: 4:00 PM **Location:** 390 Robert Steet

Members Present:

- ☒ Chair, Charlie Zelle
- ☒ Judy Johnson, District 1
- ☒ Reva Chamblis, District 2
- ☒ Deb Barber, District 4
- ☒ Molly Cummings, District 5
- ☒ John Pacheco, District 6
- ☐ Robert Lilligren, District 7
- ☐ Abdirahman Muse, District 8
- ☒ Raymond Zeran, District 9
- ☒ Peter Lindstrom, District 10
- ☒ Susan Vento, District 11
- ☐ Francisco Gonzalez, District 12
- ☐ Chai Lee, District 13
- ☐ Kris Fredson, District 14
- ☒ Phillip Sterner, District 15
- ☒ Wendy Wulff, District 16

☒ = present

Call to Order

A quorum being present, Council Chair Zelle called the regular meeting of the Metropolitan Council to order at 4:02 p.m.

Agenda Approved

Council Members did not have any comments or changes to the agenda.

Approval of Minutes

It was moved by Pacheco, seconded by Wulff to approve the minutes of the October 26, 2022 regular meeting of the Metropolitan Council. **Motion carried**.

Public Invitation

Peter Hendricks spoke about Metro Transit student bus pass equity. Steve Carlson spoke about Metropolitan Transportation Services bus providers and service.

Business

1. **2022-279**: That the Metropolitan Council adopt the Public Comment Draft of the 2023 Unified Budget.

It was moved by Johnson, seconded by Wulff.

Motion carried on the following roll call vote.

Aye	11	Barber, Chamblis, Cummings, Johnson, Lindstrom, Pacheco, Sterner, Vento, Wulff, Zelle, Zeran
Nay	0	
Absent	5	Fredson, Gonzalez, Lee, Lilligren, Muse

Consent Business

Consent Business Adopted (Items 1-10)

1. **2022-255:** That the Metropolitan Council authorize its Regional Administrator to award and execute contract 21P143B, Master Contract II for Bass Lake Spur Freight Rail Maintenance and Repair, to North Shore Track Services, Inc., for an amount not to exceed $5,172,441.71.
2. **2022-256:** That the Metropolitan Council ("Council") authorize the Regional Administrator to negotiate and execute Subordinate Funding Agreement #16 (12I021P) with the Minnesota Department of Transportation ("MnDOT") in an amount not to exceed $1,410,545.
3. **2022-257:** That the Metropolitan Council ("the Council") authorize the Regional Administrator to negotiate and execute Subordinate Funding Agreement #2 (21I147B) with the Minnesota Department of Transportation ("MnDOT") in an amount not to exceed $1,728,837.
4. **2022-258:** That the Metropolitan Council ("the Council") authorize the Regional Administrator to negotiate and execute Subordinate Funding Agreement #9 (17I024I) with the Minnesota Department of Transportation ("MnDOT") in an amount not to exceed $1,817,309.
5. **2022-259**: That the Metropolitan Council ("Council") authorize the Regional Administrator to negotiate and execute Subordinate Funding Agreement #8 (14I044H) with the Minnesota Department of Transportation ("MnDOT") in an amount not to exceed $1,814,079.
6. **2022-263**: That the Metropolitan Council authorize the Regional Administrator to execute an amendment for Contract 16P282B with Cintas Inc, formerly G&K Services, for Non-Operator Uniform lease and laundry services for a total contract amount not to exceed $529,307.01.
7. **2022-264**: That the Metropolitan Council authorize the Regional Administrator to negotiate and execute Contract 21P218 with City Laundry Co., that will provide garment lease and laundry services for up to 5 years, for up to 750 employee uniforms across 5 different Metro Transit departments in an amount not to exceed $1,461,544.91.
8. **2022-268**: That the Metropolitan Council authorize the Regional Administrator to negotiate and execute Contract 22P018 with Turner & Townsend, AMCL Inc., for development and support of a strategy to purchase and implement a Council wide Enterprise Asset Management solution in an amount not to exceed $2,300,000.
9. **2022-270**: That the Metropolitan Council adopt the attached Review Record and take the following actions:
    1. Authorize the City of Brooklyn Park to place its comprehensive plan amendment into effect.
    2. Find that the amendment does not change the City's forecasts.
    3. Advise the City to implement the advisory comments in the Review Record for Forecasts and Natural Resources.
10. **2022-271**: That the Metropolitan Council adopt the attached Review Record and take the following actions:
    1. Authorize the City of St. Francis to place its comprehensive plan amendment into effect.
    2. Find that the amendment does not change the City's forecasts.
    3. Find that the amendment renders the City's comprehensive plan inconsistent with the Council's housing policy, and therefore the City will be unable to participate in Livable Communities Act (LCA) programs.
    4. Advise the City:
        a. To become consistent with housing policy, the City may choose to guide more land expected to develop before 2030 at 12 units per acre to address

its share of the region's 2021-2030 need for affordable housing for 50% of area median income (AMI) and below.

b. To implement the advisory comments in the Review Record for Transportation, Forecasts, and Water Supply.

It was moved by Chamblis, seconded by Johnson.

Motion carried.

Non-Consent Business – Reports of Standing Committees

Community Development

1. Reports on consent agenda

Environment

1. **2022-266 SW:** That the Metropolitan Council authorize the Regional Administrator to negotiate and execute Contract 21P015 with Adolfson & Peterson Construction to design and build the Metropolitan Wastewater Treatment Plant Services Building and Site Improvements project, in an amount not to exceed $47,126,000.

It was moved by Lindstrom, seconded by Wulff.

Motion carried.

Management

1. Reports on consent agenda

Transportation

1. **2022-234:** That the Metropolitan Council shall approve the DIDB Policy update, including the new threshold.

It was moved by Barber, seconded by Chamblis.

Council Member Johnson asked when this item when to the Equity Advisory Committee. The item went to the EAC on October 25. Council Member Chamblis commented on the transportation disparate impact and intended destinations and services.

Motion carried.

2. **2022-235:** That the Metropolitan Council shall approve the 2023-2025 Title VI Program.

It was moved by Barber, seconded by Sterner.

Motion carried.

3. **2022-265 SW:** That the Metropolitan Council ("Council") authorize the Regional Administrator to execute an agreement (#21I039) with Minnesota Department of Transportation ("MnDOT") for the purpose of supplying Metro Transit with bulk salt for system use for an amount not to exceed $611,000.

It was moved by Barber, seconded by Cummings.

Motion carried.

4. **2022-276 SW:** That the Council authorize the Regional Administrator to exercise an option on existing contract 19P385A with ASC Acquisition Co./DBA Albrecht Sign Company for the fabrication and delivery of 47 pylon signs and 1 suspended horizontal sign for installation on the METRO B Line project, in an amount not to exceed $1,477,770.

It was moved by Barber, seconded by Sterner.

Council Member Barber shared that this was one of several B Line items that were in front of the Transportation Committee, showing progress on the line. Council Member Sterner noted that this is a local, union small business.

Motion carried.

Reports

Council Members, Chair, Regional Administrator, and General Counsel did not have any reports.

Adjournment

Business completed; the meeting adjourned at 4:28 p.m.

Certification

I hereby certify that the foregoing narrative and exhibits constitute a true and accurate record of the Metropolitan Council meeting of October 26, 2022.

Approved this 9th day of November, 2022.

Council Contact:

Bridget Toskey, Recording Secretary
Bridget.Toskey@metc.state.mn.us
651-602-1806

Attachment G: Approved Service and Fare Equity Analyses

Committee Report

Transportation Committee

Committee Meeting Date: June 26, 2023 **For the Metropolitan Council:** June 28, 2023

Business Item: 2023-129 SW

Implementation of the Transit Fare Elimination Pilot Program

Proposed Action

1. That the Metropolitan Council:
2. Implement the legislatively mandated transit fare elimination pilot program on Metro Transit Route #32 and #62 from July 1, 2023, to December 31, 2024;
3. From July 1, 2023, to December 31, 2024, provide all regular route service free of charge to individuals who are certified as disabled under the Americans with Disability Act requirements of the Federal Transit Administration or certified as eligible for special transportation service under Minnesota Statutes section 473.386, subdivision 2a; and
4. Direct staff to submit the required legislative report on the pilot program by February 15, 2025.

Summary of Transportation Committee Discussion/Questions

Dennis Dworshak & Christine Kuennen presented this item. Council Members discussed the pilot program's details and future impact.

Moved by Vento, seconded by Dolkar. Motion carried.

Business Item

Transportation Committee

Committee Meeting Date: June 26, 2023 **For the Metropolitan Council:** June 28, 2023

Business Item: 2023-129 SW

Implementation of the Transit Fare Elimination Pilot Program

District(s), Member(s): All

Policy/Legal Reference: OEEO 6-1 Title VI Major Service Change Policy; OEEO 6-2 Title VI Disparate Impact and Disproportionate Burden Policy; 2023 Minn. Laws ch. 68, art. 4, § 122; 49 C.F.R. § 37.131

Staff Prepared/Presented: Lesley Kandaras, Interim General Manager, 612-349-7513

Edwin Petrie, Director Finance (612) 349-7624

Dennis Dworshak Sr Manager, Revenue Operations (612) 349-7364

Charles Carson, Executive Director MTS (651) 602-1761

Gerri Sutton, Director Contracted Services (651-602-1672

Christine Kuennen, Sr Manager, Metro Mobility (651)-602-1689

Division/Department: Transportation, Metro Transit and Metropolitan Transportation Services

Proposed Action

1. That the Metropolitan Council:
2. Implement the legislatively mandated transit fare elimination pilot program on Metro Transit Route #32 and #62 from July 1, 2023, to December 31, 2024;
3. From July 1, 2023, to December 31, 2024, provide all regular route service free of charge to individuals who are certified as disabled under the Americans with Disability Act requirements of the Federal Transit Administration or certified as eligible for special transportation service under Minnesota Statutes section 473.386, subdivision 2a; and
4. Direct staff to submit the required legislative report on the pilot program by February 15, 2025.

.

Background

The Transportation Finance Omnibus Bill enacted during the 2023 legislative session requires the Council to implement a transit fare elimination pilot program ("Pilot Program") from July 1, 2023, to December 31, 2024. Transit service under the Pilot Program must be provided free of charge or at a reduced fare on two regular routes. Free or reduced fare service must be implemented on the entirety of each selected route during both peak and nonpeak service hours.

Staff identified Route #32 and #62 as the best routes for this Pilot Program. Both routes serve people who depend on transit, people of color, and people with low incomes. These routes also serve the east metro and west metro and include a mix of core local and supporting local service. Selecting these areas for the pilot program will help the Council evaluate how different routes and market areas respond to free transit services.

Staff concluded free fares (rather than reduced fares) provide the best incentive to increase ridership, meets the intent of the legislation, is the easiest to implement by the Legislature's July 1, 2023 deadline, and provides for faster boarding with a simple clear transfer policy. Transfers will not be provided on the free routes.

A Title VI fare equity analysis requirement applies to all fare changes regardless of the amount of increase or decrease. As with the service equity analysis, the Federal Transit Administration ("FTA") requires transit providers to evaluate the effects of fare changes on low-income populations in addition to Title VI-protected populations. The analysis is expected to be completed before July 1, 2023.

During the Pilot Program, the legislation requires the Council to provide regular route transit service free of charge to individuals who are certified as disabled under the FTA's ADA requirements or certified by the Council as eligible for Metro Mobility service. The fare free service to Metro Mobility riders applies to all regular route service; not just the two Pilot Program regular routes. The Council has met with regional providers to coordinate implementation of this Council established fare policy change for the metropolitan area.

Consistent with FTA regulations for complementary paratransit service for ADA paratransit eligible persons, Metro Mobility customers will ride fare free for rides to origins and destinations within three-fourths of a mile on each side of the two selected regular routes.

As the Pilot Program is implemented the Council will develop an approach to evaluate the Pilot Project and by February 15, 2025, submit to the Legislature a report that includes:

- An overview of the Pilot Program implementation;
- An evaluation of the effects on ridership, travel time, service equity, and rider experience and other measures of quality of life;
- A review of fiscal impacts, including foregone revenues, costs related to service changes, and potential cost efficiencies;
- An analysis of barriers, best practices, economic impacts, and other considerations; and
- Any recommendations regarding any subsequent implementation of free or reduced-fare transit service.

An overview of this Pilot Program was presented to the Council at its June 14, 2023, meeting. That presentation included information on the two proposed bus routes.

.

Rationale

The 2023 Transportation Omnibus legislation requires the Council to establish this Pilot Program by July 1, 2023. The Council normally would initiate proposed fare changes under its Transit Fare Policy Changes Policy (FM 12-2) and Transportation Service Fare Policy Changes Procedure (FM 12-2a) but the legislatively prescribed fare changes and deadline for implementing this Pilot Program do not allow the Council sufficient time to apply its fare changes policy and procedure.

Thrive Lens Analysis

This Pilot Program advances Thrive MSP 2040 regional outcomes by examining the impacts of providing riders with transit rides at no direct cost to them. Increasing transit ridership and reducing barriers for people to ride transit would help contribute to regional stewardship, prosperity, livability, equity, and sustainability using a data driven approach to measure the effectiveness of the Council's efforts.

Funding

This Pilot Project will be fully funded with local funding included in the Transportation Operating Budgets

Title VI Fare Equity Analysis

2023 Fare Free Pilot

June 28, 2023

Prepared by:

SRF

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.

TABLE OF CONTENTS

Executive Summary **4**

Chapter 1: Introduction **6**

Report Purpose 6

Proposed Fare Simplification 6

Federal Requirements 6

Chapter 2: Existing and Proposed Fares **8**

Factors Affecting Existing Fares 8

Recent Fare Changes 10

Proposed Fare Change 10

Chapter 3: Title VI Principles and Definitions **11**

Title VI and Environmental Justice 11

Requirement to Conduct Fare Equity Analyses 12

Title VI Definitions of Minority and Low-Income Populations 14

Chapter 4: Analysis Methodology **16**

Process 16

Data Source 16

Cleaning Survey Data 17

Developing Unique Fare Combinations 19

Chapter 5: Evaluation of Impacts **20**

Proposed changes 20

Step 1: Determine Fare Use 20

Step 2: Calculate Average Fares 22

Step 3: Compare Changes 22

Chapter 6: Conclusions **23**

TABLE OF FIGURES

Figure 1. Existing Base Fare Structure 8

TABLE OF TABLES

Table 1. Existing and Proposed Fares 10

Table 2. 2016 Department of Health and Human Services Poverty Guidelines in Dollars 15

Table 3. On Board Survey Variables Applicable to Analysis 17

Table 4. Identification of Low-Income Riders for Analysis 18

Table 5. Unique Fare Combinations 19

Table 6. Existing and Proposed Fares 20

Table 7. Existing and Proposed Unique Fare Combinations by Rider Group 21

Table 8. Average Fare per Trip by Rider Group 22

EXECUTIVE SUMMARY

Metro Transit and the Metropolitan Council, in cooperation with a legislative requirement, are proposing a fare-free pilot for two routes, Route 32 and Route 62. The proposed fare change will be in place for 18 months in accordance with Section 122 of the recently passed HF 2887.[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 lasting longer than six months, regardless of the amount of increase or decrease. This analysis fulfills this requirement as it relates to temporary fare changes required by the new bill.

Proposed Fare Change

The proposed fare change will be an extended pilot mandated by the State of Minnesota. Following completion of the 18-month period, Metro Transit and the Metropolitan Council will report the outcomes of the fare-free pilot to the Minnesota Legislature. Toward this effort, Metro Transit is analyzing the impact of eliminating fares on two local routes, Route 32 and Route 62. The existing fare structure for these routes is shown in Table i. Note that currently Metro Transit customers who pay a fare receive a 2.5-hour pass for transferring. The assumption of the fare free pilot is that Route 32 and Route 62 riders will not receive a pass and therefore would need to pay for transfers. Thus, only fares pertaining specifically to Route 32 and Route 62 are included in Table I, and not other fares collected in the system such as those for express bus and commuter rail services.

Table i. Existing and Proposed Fares, Routes 32 and 62

Fare Type	Service Type	Time of Day^	Existing Fare	Proposed Fare	Absolute Change	Percent Change
Adult*	Local Bus / METRO	Non-Rush Hour	$2.00	$0.00	-$2.00	-100%
Adult*	Local Bus / METRO	Rush Hour	$2.50	$0.00	-$2.50	-100%
Reduced Fare**	Local Bus / METRO	Non-Rush Hour	$1.00	$0.00	-$1.00	-100%
Reduced Fare**	Local Bus / METRO	Rush Hour	$2.50	$0.00	-$2.50	-100%
Mobility Fare	All	All	$1.00	$0.00	-$1.00	-100%
Transit Assistance Program (TAP)	All	All	$1.00	$0.00	-$1.00	-100%

*Ages 13-64; **Youth (ages 6-12), Seniors (ages 65+), and Medicare card holders; ^ Monday – Friday, 6-9 am and 3-6:30 pm

[1] https://www.revisor.mn.gov/bills/bill.php?b=House&f=HF2887&ssn=0&y=2023

Framework for Evaluating Impacts

The purpose of this report is to evaluate the 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 "90% rule," which states that there may be evidence of disparate impact if:

- Benefits are being provided to BIPOC populations at a rate less than 90% of the benefits being provided to white populations, or
- Adverse effects are being borne by white populations at a rate less than 90% 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

Table ii 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. All demographic rider groups will experience a 100% decrease in average fare paid, resulting in comparison indices of 1.0.

Table iii. Results by Rider Group

Measure	Minority Riders	Non-Minority Riders	Low-Income Riders	Non-Low-Income Riders
Percent Change in Average Fare	-100%	-100%	-100%	-100%
Comparison Index	1.00	--	1.00	--
Disparate Impact / Disproportionate Burden?	No	--	No	--

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 **the fare free pilot do not result in disparate impact on BIPOC riders nor disproportionate burden on low-income riders**.

CHAPTER 1: INTRODUCTION

Metro Transit and the Metropolitan, in cooperation with a legislative requirement, are proposing a fare-free pilot for two routes, Route 32 and Route 62. The proposed fare change will be in place for 18 months.

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 requested by the Minnesota Legislature 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 a fare free pilot on Route 32 and Route 62. While using these particular routes will be free of charge, transfers to other routes not included in the pilot will require a fare as is currently in place.

This pilot does not include proposed changes in the locations where fares are distributed or sold, nor would they introduce any new fare types of 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 fare free pilot advances this goal by reducing barriers to transit use. Doing so may increase ridership by making the two routes included in the pilot more convenient to use for both existing and potential riders. Additionally, eliminating the fare on these routes may improve the on-time performance of the service by shortening dwell times and reduce driver-passenger conflict. These benefits will further make transit service more convenient for riders.

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.

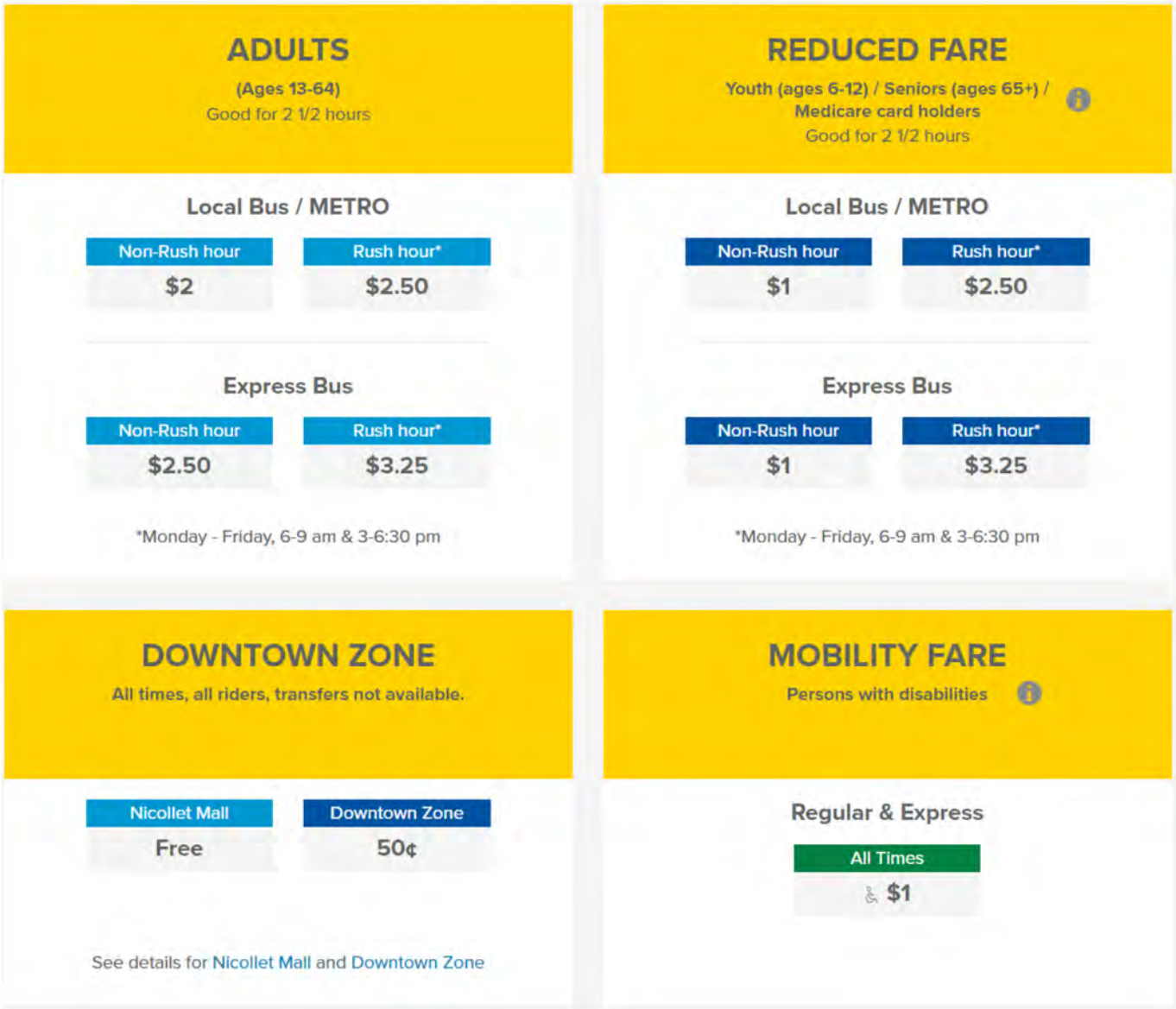
CHAPTER 2: EXISTING AND PROPOSED FARES

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. Note that Route 32 does not pass through either Downtown Zone while a portion of the Route 62 is within the Saint Paul Downtown Zone.

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 & Time of Day

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**. Both the Route 32 and Route 62 are Local Bus routes, so Express Bus fares will not be noted in this analysis.

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., Metro Pass costs $83 per month). 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 fare change scenario analyzed in this report is summarized in Table 1 alongside the absolute and percent change in fares.

The proposed fare changes remove all cost, no matter the time of day (Rush Hour and Non-Rush Hour) or fare type (Adult and Reduced Fare).

Table 1. Existing and Proposed Fares

Fare Type	Service Type	Time of Day^	Existing Fare	Proposed Fare	Absolute Change	Percent Change
Adult*	Local Bus / METRO	Non-Rush Hour	$2.00	$0.00	-$2.00	-100.0%
Adult*	Local Bus / METRO	Rush Hour	$2.50	$0.00	-$2.50	-100.0%
Reduced Fare**	Local Bus / METRO	Non-Rush Hour	$1.00	$0.00	-$1.00	-100.0%
Reduced Fare**	Local Bus / METRO	Rush Hour	$2.50	$0.00	-$2.50	-100.0%
Mobility Fare	All	All	$1.00	$0.00	-$1.00	-100.0%
Downtown Zone	All	All	$0.50	$0.00	-$0.50	-100.0%
Transit Assistance Program (TAP)	All	All	$1.00	$0.00	-$1.00	-100.0%

*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.[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 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.[3]

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."[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, 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.

---

[2] 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.
[3] 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.
[4] 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.
[5] 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.[6] 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 lasting more than six months, 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.[7]

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.[8]

Similarly, FTA defines *disproportionate burden* as:

> a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations.[9]

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.

---

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

[7] 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.

[8] FTA, *Circular 4702.1B*, page I-2

[9] FTA, *Circular 4702.1B*, page I-2

Metro Transit has recently redefined its **disparate impact and disproportionate burden policies** and thresholds to a higher standard than the "80% rule" to state that there may be evidence of disparate impact if:

- *Benefits* are being provided to BIPOC populations at a rate less than 90% of the benefits being provided to white populations, or
- *Adverse effects* are being borne by white populations at a rate less than 90% 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.[10] 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 90% for its disparate impact and disproportionate burden thresholds was subject to a formal public outreach process before being adopted by the Metropolitan Council in 2022. Additional information about the policies and their applications can be found in the Council's current Title VI Program.[11]

Policies Applied to Proposed Fare Simplification

The fare free pilot evaluated in this report would decrease fares for the average rider on Routes 32 and 62. 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 90 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.

[10] 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.
[11] Metropolitan Council, *Title VI Program*, October 2022, https://metrocouncil.org/About-Us/Publications-And-Resources/EQUAL-OPPORTUNITY-DOCUMENTS/TITLE-VI-DOCUMENTS/Title-VI-Compliance-and-Implementation-Plan.aspx.

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.[12] 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 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 by transit providers using other established measures that are at least as inclusive as those developed by HHS.

Correspondingly, this Title VI rare 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.[13] Table 2 lists 185% of the 2016 HHS poverty guidelines that are used in this analysis.

[12] 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.

[13] 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 2. 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 ***Error! Reference source not found.***.

Data Source

Fare use and transit rider demographics were gathered from the most recent Travel Behavior Inventory (TBI) 2016 Transit On Board Survey.[14] 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 2022, however, these data were not available at the time of analysis.[15]

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 unlinked transit trips to represent the trips when a passenger paid their fare; this approach thus excludes transfer trips, which are not eligible for a free fare in the pilot program.

[14] Metropolitan Council, *Travel Behavior Inventory (TBI) 2016 On Board Survey*, https://gisdata.mn.gov/dataset/us-mn-state-metc-society-tbi-transit-onboard2016.

[15] 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.

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.[16] 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 3 lists variables from the survey that were used to inform this fare equity analysis.

Table 3. 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.
Demographic	Total Annual Household Income	Less than $15,000, $15,000-$24,999, $25,000-$34,999, $35,000-$59,999, $60,000-$99,999, $100,000-$149,999, $150,000-$199,999, $200,000 or more, Not provided
Demographic	Household Size	1, 2, 3, 4, 5, 6, 7, 8, 9, 10+
Demographic	Disability Status	Yes, No, Don't Know/Refuse
Service	Route Provider	Metro Transit, Metropolitan Council, Maple Grove, MVTA, Plymouth, SouthWest, U of M^
Service	Time Period	AM Peak, Evening, Midday, PM Peak
Fare	Fare Type	Regular (ages 13-64), Limited Mobility Pass, Senior (over 65), Student/Youth (ages 6-12)
Fare	Payment Method	Cash, Go-To Stored Value, Credit / Debit, Mobile Ticket, Metro Pass, Employee Pass, College Pass, U Pass, Student Pass, Qualified Free Ride (Service-Connected Veteran), Token, Day Pass^, Weekly / Monthly Pass^, Free Fare Zone^, Other^

*As reported in TBI results
**Respondents were allowed to select multiple race/ethnicity categories; those who chose to do so were considered BIPOC for the purposes of this analysis
^Excluded from analysis

Assigning Low-Income Status

The identification of low-income riders was based on a combination of self-reported household size and household income. The 2016 HHS poverty guidelines (185%) referenced in this evaluation are shown in Table 2.

TBI survey respondents were asked to report their total annual household income based on a series of income brackets, each with a range of at least $10,000 (as shown in Table 3). These income brackets do not correspond to the HHS poverty guidelines (Table 2). Thus, for this fare equity analysis, the median value of each income bracket was used to represent a survey respondent's household income; this, in combination with reported household size, was then compared to the HHS poverty

[16] Language assistance resources made available based on the Metropolitan Council's Language Assistance Plan at the time.

guidelines to determine whether or not the respondent would be assigned low-income or non-low-income status.

Table 4 shows whether or not survey respondents were considered low-income – as indicated by "LI" in the table – or non-low-income, based on their reported income bracket and household size, relative to 185% of the 2016 HHS poverty guidelines.

Table 4. Identification of Low-Income Riders for Analysis

Based on median of reported total annual household income range and reported household size in on board survey
Table cells with "LI" indicate that that combination of household income and household size was designated low-income

Reported Total Annual Household Income Range from TBI	Median of Income Range	1	2	3	4	5	6	7	8	9	10
Less than $15,000	$7,500	LI	LI	LI	LI	LI	LI	LI	LI	LI	LI
$15,000 - $24,999	$20,000	LI	LI	LI	LI	LI	LI	LI	LI	LI	LI
$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 using routes beyond Route 32 or Route 62 including those who may have used Route 32 or Route 62 but transferred to or from another service, representing 99.7% of the total daily trips in the original dataset
- 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 dataset[17]
- 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

[17] 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.

After removing these excluded survey records, the final number of daily unlinked trips used in the analysis was 899, or 0.3% of those reported in the original dataset.

Developing Unique Fare Combinations

The methods used in determining unique fare combinations for this study were adapted from a 2022 fare change analysis report completed by Metro Transit using the same TBI on board survey dataset. For more information on the determination of unique fare combinations, see "Title VI Fare Equity Analysis: 2022 Fare Simplification Report."

This analysis represents a simplification of those methods used in the 2022 analysis given this study's limited extent. Unique fare combinations were developed using the relevant survey records. 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) remained the same apart from the U Pass. The University of Minnesota Twin Cities changed their U Pass program at the start of the 2022-23 academic year to include the cost of an unlimited transit pass in mandatory student fees. As such, the cost of the U Pass is assumed to be free making its per trip cost also $0.00. A summary of the unique fare combinations for survey records associated with Route 32 and Route 62 can be found in **Table 5**.

Table 5. Unique Fare Combinations

Time of Day	Fare Type	Payment Method	Estimated Cost
Off-Peak	Limited Mobility Pass	Cash	$1.00
Off-Peak	Limited Mobility Pass	Go-To Card	$1.00
Off-Peak	Limited Mobility Pass	Free Ride Pass	$0.00
Off-Peak	Regular Fare	10-Ride	$1.60
Off-Peak	Regular Fare	Cash	$2.00
Off-Peak	Regular Fare	Go-To Card	$2.00
Off-Peak	Regular Fare	Metropass	$3.22
Off-Peak	Regular Fare	Token	$0.00
Off-Peak	Senior	Cash	$1.00
Off-Peak	Senior	Go-To Card	$1.00
Peak	Limited Mobility Pass	Go-To Card	$1.00
Peak	Limited Mobility Pass	Metropass	$3.22
Peak	Regular Fare	Cash	$2.50
Peak	Regular Fare	Go-To Card	$2.50
Peak	Regular Fare	Free Ride Pass	$0.00
Peak	Regular Fare	U Pass	$0.00
Peak	Senior	Cash	$2.50

CHAPTER 5: EVALUATION OF IMPACTS

Proposed changes

The proposed changes for the fare free pilot are show in Table 6.

Table 6. Existing and Proposed Fares

Fare Type	Service Type	Time of Day^	Existing Fare	Proposed Fare	Absolute Change	Percent Change
Adult*	Local Bus / METRO	Non-Rush Hour	$2.00	$0.00	-$2.00	-100.0%
Adult*	Local Bus / METRO	Rush Hour	$2.50	$0.00	-$2.50	-100.0%
Reduced Fare**	Local Bus / METRO	Non-Rush Hour	$1.00	$0.00	-$1.00	-100.0%
Reduced Fare**	Local Bus / METRO	Rush Hour	$2.50	$0.00	-$2.50	-100.0%
Mobility Fare	All	All	$1.00	$0.00	-$1.00	-100.0%
Downtown Zone	All	All	$0.50	$0.00	-$0.50	-100.0%
Transit Assistance Program (TAP)	All	All	$1.00	$0.00	-$1.00	-100.0%

*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

All impacted riders considered in this analysis would experience a decrease in fare. Table 7 lists the 13 unique fare combinations of fare 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 7. Existing and Proposed Unique Fare Combinations by Rider Group

Existing and proposed per-trip fares incorporate payment method and relevant per-trip assumptions for multiple-ride passes.

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	Low-Income Riders	Non-Low-Income Riders	Percent of Total Riders
Adult	Local Bus / METRO	Non-Rush Hour	Cash or Similar	$2.00	$0.00	-$2.00	-100.0%	324	218	106	164	160	36.1%
Adult	Local Bus / METRO	Non-Rush Hour	Metropass	$3.22	$0.00	-$3.22	-100.0%	27	16	11	0	27	2.9%
Adult	Local Bus / METRO	Non-Rush Hour	10-Ride Pass	$1.60	$0.00	-$1.60	-100.0%	9	9	0	9	0	1.1%
Adult	Local Bus / METRO	Non-Rush Hour	Token	$0.00	$0.00	-$0.00	-100.0%	32	32	0	32	0	3.5%
Adult	Local Bus / METRO	Rush Hour	Cash or Similar	$2.50	$0.00	-$2.50	-100.0%	349	219	130	219	130	38.9%
Adult	Local Bus / METRO	Rush Hour	U-Pass	$0.00	$0.00	-$0.00	-100.0%	13	0	13	0	13	1.5%
Adult	Local Bus / METRO	Rush Hour	Veteran	$0.00	$0.00	-$0.00	-100.0%	8	8	0	8	0	0.9%
Reduced Fare	Local Bus / METRO	Non-Rush Hour	Cash or Similar	$1.00	$0.00	-$1.00	-100.0%	31	0	31	15	16	3.5%
Reduced Fare	Local Bus / METRO	Rush Hour	Cash or Similar	$2.50	$0.00	-$2.50	-100.0%	4	0	4	0	4	0.4%
Mobility Fare	Local Bus / METRO	Non-Rush Hour	Cash or Similar	$1.00	$0.00	-$1.00	-100.0%	40	28	12	22	18	4.4%
Mobility Fare	Local Bus / METRO	Non-Rush Hour	Veteran	$0.00	$0.00	-$0.00	-100.0%	1	1	0	0	1	0.1%
Mobility Fare	Local Bus / METRO	Rush Hour	Cash or Similar	$1.00	$0.00	-$1.00	-100.0%	22	0	22	22	0	2.5%
Mobility Fare	Local Bus / METRO	Rush Hour	Metropass	$3.22	$0.00	-$3.22	-100.0%	38	38	0	38	0	4.3%
							Total	899	570	329	530	369	100.0%

Step 2: Calculate Average Fares

Table 8 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 7. The percent changes in average fare per trip from Table 8 are then used in Step 3 to determine disparate impact and disproportionate burden.

Table 8. Average Fare per Trip by Rider Group

	All Riders	BIPOC Riders	White Riders	Low-Income Riders	Non-Low-Income Riders
Impacted Riders	--	--	--	--	--
Count	899	570	329	530	369
Percent makeup	--	63.4%	36.6%	59.0%	41.0%
Average Fare per Trip	--	--	--	--	--
Existing Fare	$2.06	$2.11	$1.97	$2.03	$2.10
Proposed Fare	$0.00	$0.00	$0.00	$0.00	$0.00
Absolute Change	-$2.06	-$2.11	-$1.97	-$2.03	-$2.10
Percent Change	-100.0%	-100.0%	-100.0%	-100.0%	-100.0%
Comparison Index*	--	1.00	--	1.00	--

*Example: -100.0% / -100.0% = 1.00
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 12), 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 0.90 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 8, on average, BIPOC riders would experience a 100.0% decrease in fare paid per trip under the proposed fare change compared to existing fares. This fare decrease is equal to that for the average white rider. The resulting comparison index is 1.00. Therefore, per Metro Transit Title VI policies, this analysis identified **no disparate impact on BIPOC riders** as a result of the fare-free pilot.

On average, low-income riders would experience a 100.0% decrease in fare paid per trip – the same decrease as that for the average non-low-income rider (Table 8). The resulting comparison index of 1.00 is greater than the 0.90 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 fare-free pilot.

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.

CHAPTER 6: CONCLUSIONS

Metro Transit and the Metropolitan, in cooperation with a legislative requirement, are proposing a fare-free pilot for two routes, Route 32 and Route 62. The proposed fare change will be in place for 18 months.

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.

The evaluation 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.

Metro Transit and Metropolitan Council leadership can proceed with the fare-free pilot for Route 32 and 62 as designed.

Committee Report

Transportation Committee

Committee Meeting Date: November 13, 2023 **For the Metropolitan Council:** December 13, 2023

Business Item: 2023-210

2022 Service Equity Evaluation Report and Title VI Review

Proposed Action

That the Metropolitan Council approve the results of the 2022 Title VI Service Equity Analysis (SEA) for the 2022 Service Equity Evaluation (SEE) Report.

Summary of Transportation Committee Discussion/Questions

Metro Transit Service Development Senior Planner Victoria Dan and Equity & Inclusion Senior Manager Celina Martina presented this item.

Vento asked whether there is a correlation between Black and Native American residents' access to more trips and the on-time performance they experience, relative to other populations by race/ethnicity. Martina stated that there is no current calculation to confirm a correlation, but it is possible and a consideration.

Carter, Toni asked for clarification on what is considered a Major Service Change and if the FTA ever requires looking at changes over periods longer than one year. Metro Transit Service Development Director Adam Harrington stated that the Council policy is that if there is a 25% change (negative or positive) in hours on a route or in an area, that would be consistent with a Major Service Change and require a Title VI Service Equity Analysis. Harrington continued that in 2020, Metro Transit started looking at the whole year due to the level of service changes occurring. The triennial review that is completed for the FTA includes the past three years, so those changes are tracked over time. Martina added that the FTA doesn't specify a Major Service Change threshold for a Title VI Service Equity Analysis, but the Council itself establishes the policy.

> **Clarification:** Council policy defines Major Service Change as limited to a 12-month period, which can include one or multiple cumulative changes.

Cameron stated that this report doesn't address or help us understand what systemic barriers are in place for the BIPOC community to access transit and asked if there are other tools at our disposal that we should start using to address those questions. Martina answered that we do have data from the Travel Behavior Inventory (TBI) (collected every two years) and the Transit On-Board Survey (collected every five years) that tells us a little more about who uses travel, how they identify, live, income level, etc., and this is used for route planning, etc.

Dolkar suggested that in the future, a link to the entire study be provide and that Metro Transit thinks about adding a Transit Equity Manager that would work with all departments (scheduling, operations, fare structure, etc.) to ensure the data collected is used to inform operations and other decisions.

> **Clarification:** The full 2022 SEE report will be published on metrotransit.org by mid-December 2023.

Motion by Carter, Toni, seconded by Dolkar. Motion carried, Consent to Council.

Business Item

Transportation Committee

Committee Meeting Date: November 13, 2023 **For the Metropolitan Council:** December 13, 2023

Business Item: 2023-210

2022 Service Equity Evaluation Report and Title VI Review

District(s), Member(s):	All
Policy/Legal Reference:	Federal Transit Administration Circular 4702.1b
	OEEO 1-1 Equity Policy; OEEO 6-1 Title VI Major Service Change Policy; OEEO 6-2 Title VI Disparate Impact and Disproportionate Burden Policy
Staff Prepared/Presented:	Lesley Kandaras, General Manager, 612-349-7513
	Adam Harrington, Director, Service Development, 612-349-7797
	John Levin, Director, Strategic Initiatives, 612-349-7789
	Celina Martina, Senior Manager of Equity & Inclusion, 612-349-7582
	Cyndi Harper, Manager of Route Planning, 612-349-7723
	Rachel Dungca, Manager of Strategy & Performance, 612-349-7536
	Victoria Dan, Senior Planner, 612-349-7648
Division/Department:	Metro Transit

Proposed Action

That the Metropolitan Council approve the results of the 2022 Title VI Service Equity Analysis (SEA) for the 2022 Service Equity Evaluation (SEE) Report.

Background

To improve transparency of service-related decisions, Metro Transit is committed to producing an annual report assessing service equity, including a Title VI SEA reviewing service changes that occurred in the 12-month period. The Title VI SEA reviews service changes to determine whether there is potential for discrimination based on race or income. This business item pertains to the latest SEE documenting all cumulative 2022 service changes.

2022 Service Changes and Metrics

Compared to December 2021, Metro Transit scheduled 15% fewer trips in December 2022 due to the workforce shortage. Despite efforts to increase wages and recruit more operators, staffing levels remained below required levels until December 2022. Service reliability and equity were among the guiding principle used by Metro Transit to inform service reduction decisions. Metro Transit uses service metrics related to service availability, utility, and reliability, disaggregated by race, to understand potential differences in how residents access and experience transit.

Title VI SEA Results

The Title VI SEA examined effects of cumulative changes over one year (December 2021 –

December 2022) and three years (December 2019 to December 2022). The review concluded that in both scenarios there was no disparate impact on BIPOC residents and no disproportionate burden on low-income residents due to service changes in 2022. The 2022 review showed that non-low-income and White, non-Hispanic groups experienced about an 8% decrease in service, while BIPOC and low-income communities had a very slight increase in service. This demonstrates that, even when facing a challenging workforce shortage Metro Transit continued to prioritize and protect those who rely on transit the most.

Rationale

Prior to implementation of a Major Service Change, FTA and Council policy requires providers to complete a Title VI SEA to determine if the change may adversely affect BIPOC communities or disproportionately burden low-income populations.

Thrive Lens Analysis

The SEE and Title VI SEA primarily advance the Thrive Equity outcome, which means that all communities share the opportunities and challenges of growth and change. This is especially important in the context of severe reliability issues stemming from the operator shortage, which forced significant service reductions over the course of 2022. By providing a transparent accounting of 2022 service changes and their potential effects on low-income and BIPOC residents, the evaluation is an important status check that reinforces equitable transit service planning decisions.

Funding

The SEA is funded with the Metro Transit operating budget.

Small Business Inclusion

The Title VI analysis was performed by SRF Consulting as a work order under master contract 19P018 Contract for Fulfilling Title VI Requirements. The master contract was procured in 2019 in compliance with the Council Procurement procedures, which include a review by the Office of Equity and Equal Opportunity. They did not set a Disadvantaged Business Enterprise goal.

BI 2023-210:
2022 Service Equity Evaluation Report and Title VI Review

Celina Martina | Senior Equity Manager
Victoria Dan | Senior Transit Planner, Service Development

Preface

In 2020, to improve transparency of service-related decisions, Metro Transit committed to producing an annual report assessing service equity. This is the third annual report.

- **Retrospective** – The 2022 Service Equity Evaluation (SEE) and 2022 Title VI Service Equity Analysis (SEA) focus on service changes within the 12-month period.
- **Cumulative** – This review highlights outcomes at the end of 2022 resulting from net changes over the year.
- **Changes in 2023** – Strong operations hiring has led to an 8% increase in scheduled service compared to December 2022. The next annual report will provide an updated account of service changes and their impacts.

Service Equity Evaluation

- How did we change our service between 2021 and 2022?
- How did ridership patterns change?
- Did our service changes meet Title VI thresholds?
- How did different racial and ethnic groups experience our service?
  - Service availability
  - Service quality
  - Service outcomes
- How do Metro Transit's practices promote equitable service planning?

Changing Context in 2022

- Remote work and commuter trip changes
  - Workers and students continue return to in-person activities
  - Not a complete reversal: Some remote learning and work-from-home continues
- Workforce shortage worsens
  - Wage increases and recruitment are insufficient to address shortage
  - Service reliability continues to decline, requiring planned service reductions



2022 Service Baseline

- **Early 2022 service levels similar to late 2021**
- METRO LRT every 12 minutes
- METRO BRT every 10-15 minutes
  - Orange Line every 30 minutes on weekends
- Routes remain suspended
  - 12 Local routes
  - 52 Commuter and express routes
- 2 morning and afternoon Northstar trips

2022 Service Change Highlights

March & June

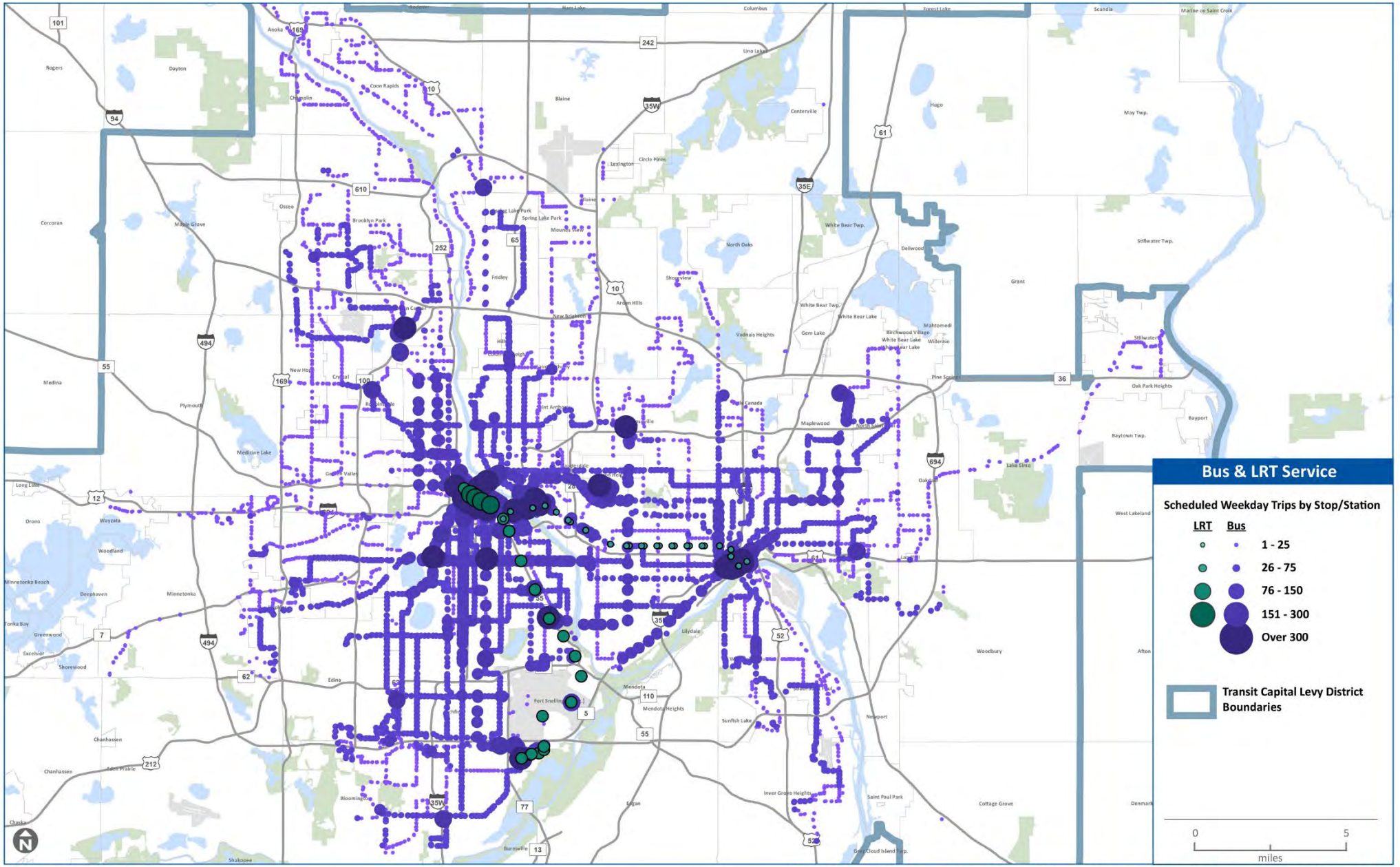
- Suspended low ridership branches on some routes
- Frequency reduced one "step" on busiest routes
- High school and U of M service reduced

August & October

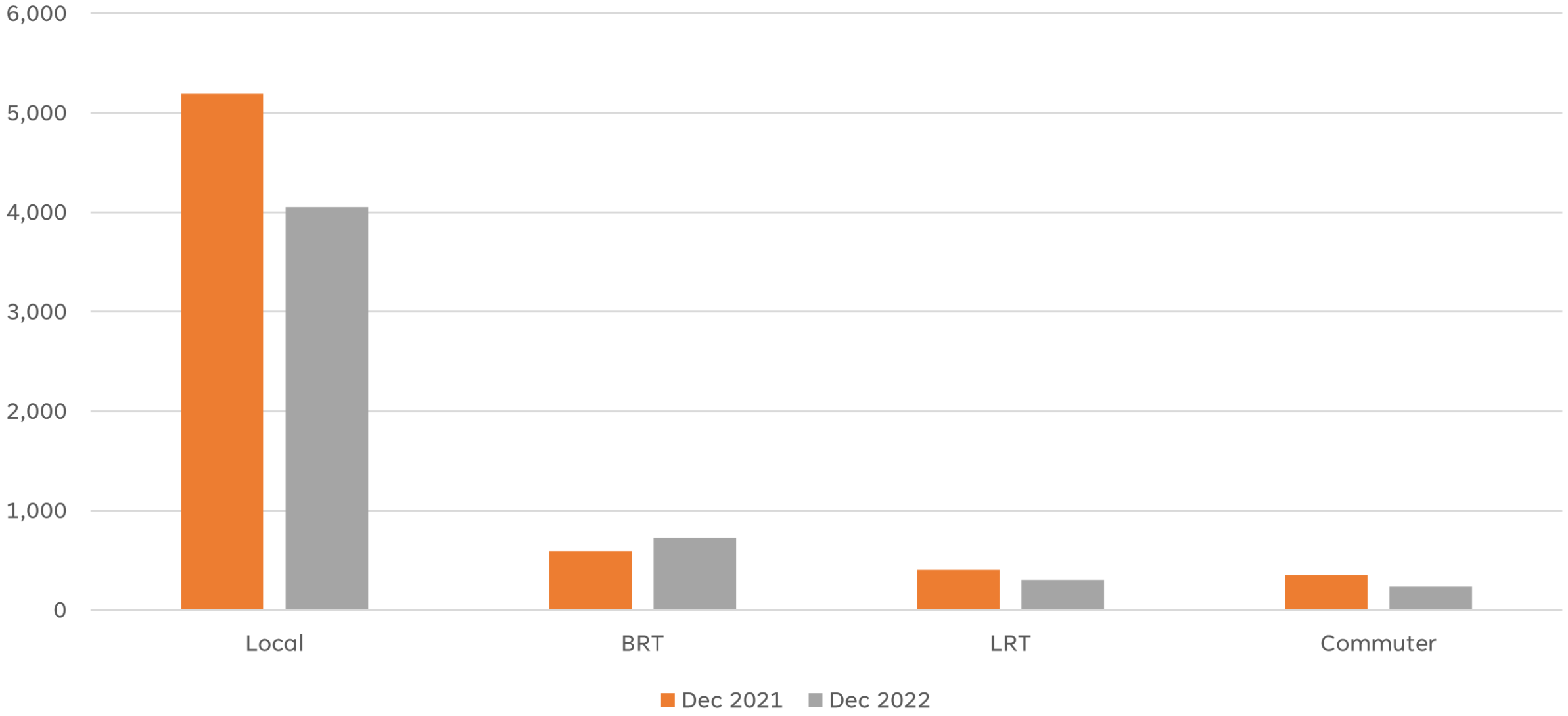
- LRT reduced from 12 to 15 minutes
- 2 more routes suspended
- 5 routes reduced to trips every 2 hours

December

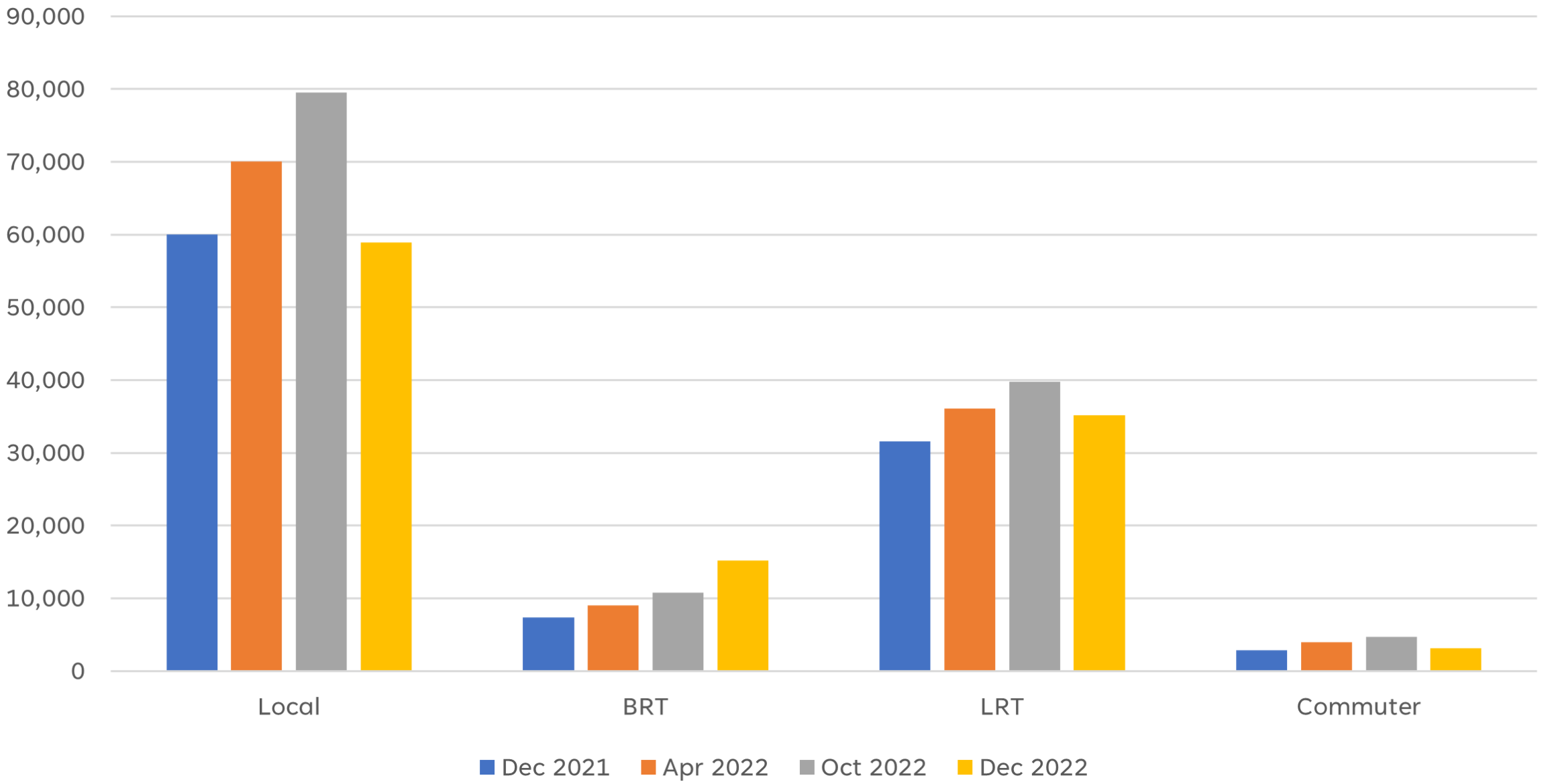
- METRO D Line opened, Rt. 5 reduced/shortened, and other corridor services replaced
- Weekday and/or weekend service suspensions on four routes
- Some routes restructured
- Frequency reductions on 37 routes, including Orange Line



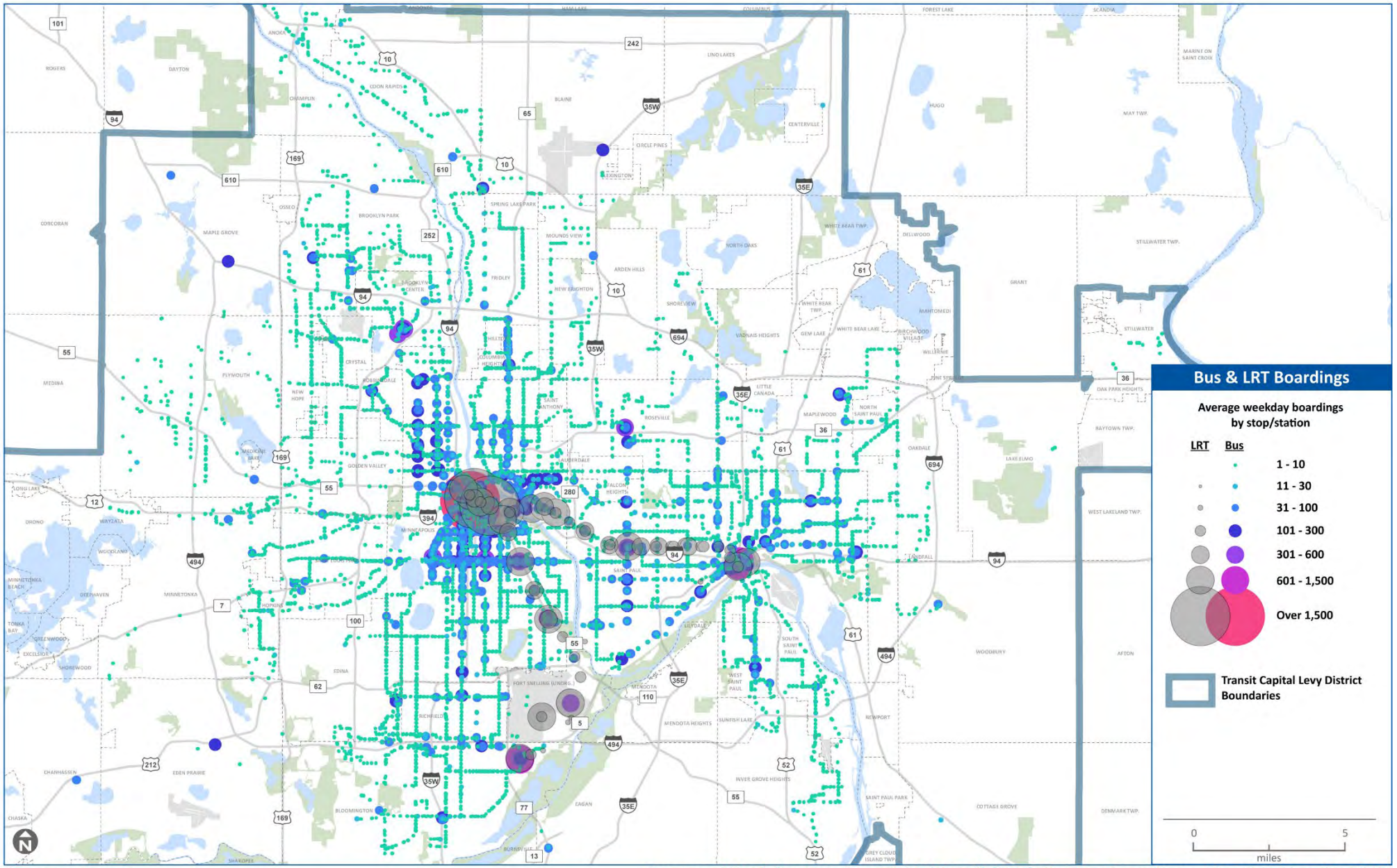
Weekday Trips by Stop, Dec 2022



Weekday Trip Counts, Dec 2021 & Dec 2022



Weekday Ridership by Route Class, Dec 2021 – Dec 2022



Metro Transit

Average Weekday Bus Stop & Light Rail (LRT) Station Boardings - Dec 3 to Dec 31, 2022

Weekday Ridership by Stop, Dec 2022

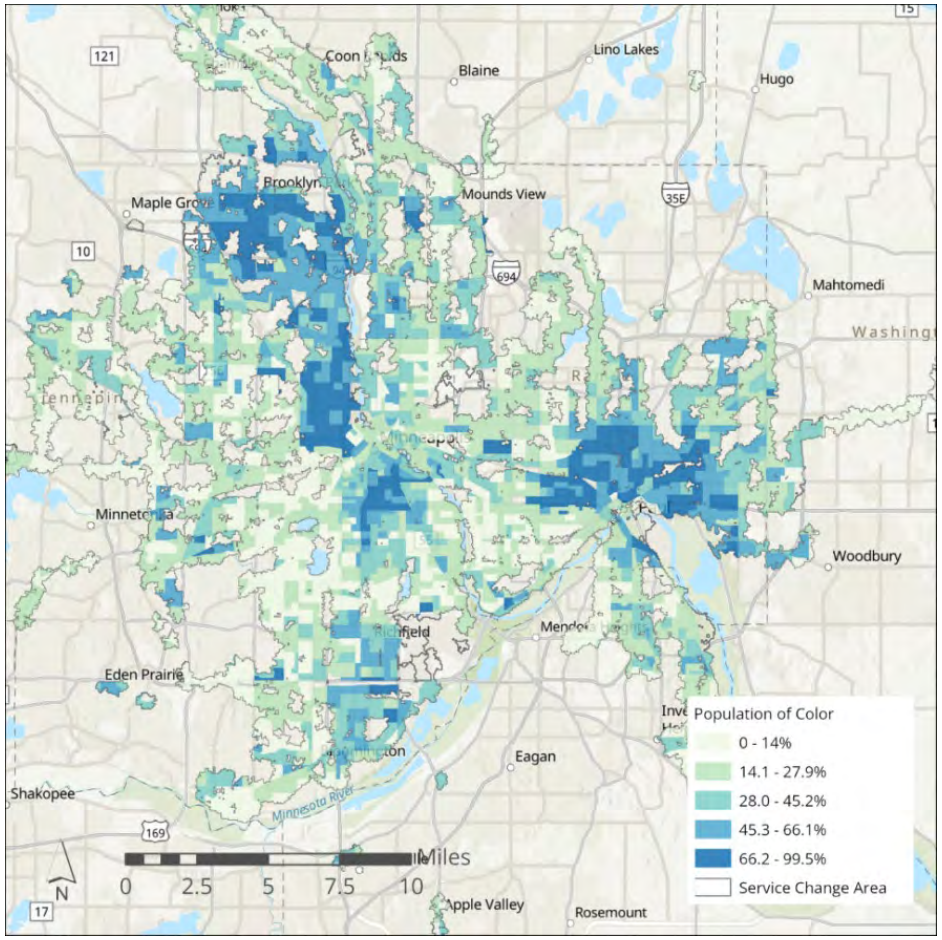
Title VI Service Equity Analysis (SEA)

- Federal law requires transit agencies to show they are not discriminating when providing transit service
  - Black, Indigenous and People of Color (BIPOC) groups
  - Low-income communities
- SEA reviews how access to transit changed in 2022
  - Service availability is defined as the number of trips in a given area
  - Change in how much service is available for average resident in a given area
  - Review how the impacts of those changes differ based on race and income
  - Non-home trips are a challenge

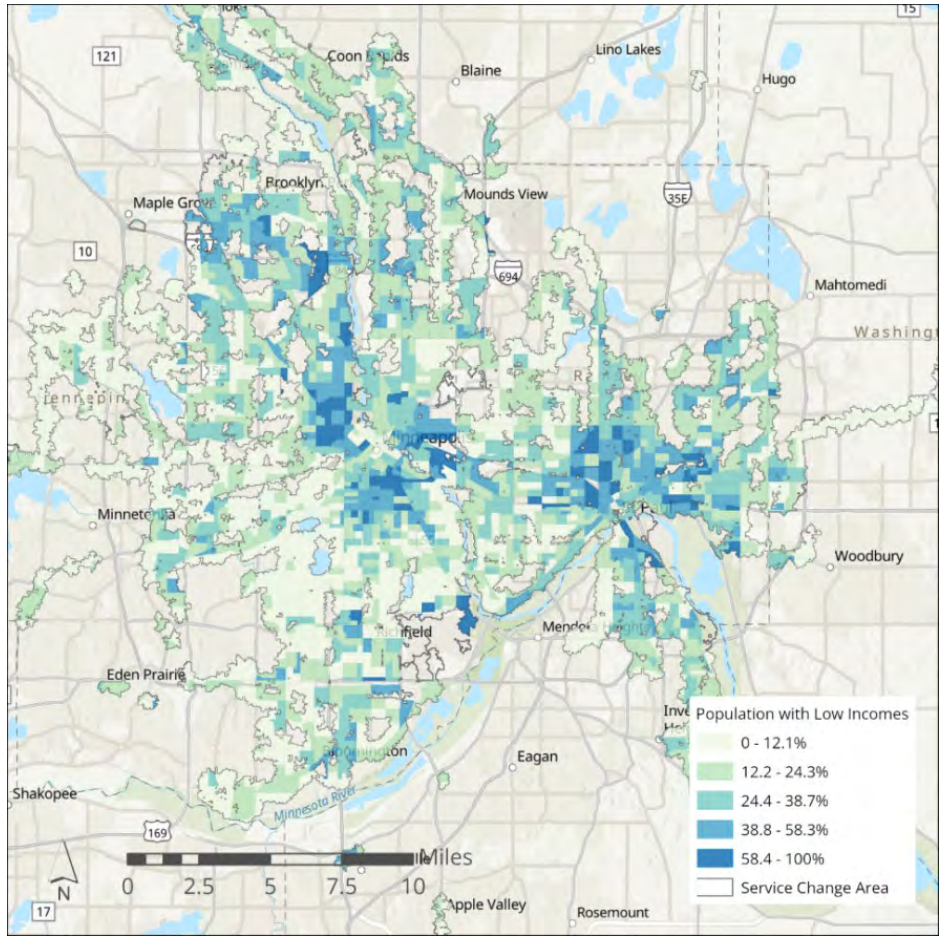
Title VI Service Equity Analysis (cont.)

- Required for all major service changes
  - 25% change in hours on a route or in an area
  - New routes and eliminated service
- Disparate Impact and Disproportionate Burden (DI/DB) threshold
  - Determines when a difference is significant enough to result in a potential for discrimination
  - Updated Council DI/DB policy
    - If adverse or beneficial effects of service changes borne by BIPOC or low-income groups are not within 10% of the effects borne by White or non-low-income populations (respectively), then there is potential for discrimination
    - Not evidence of potential discrimination if beneficial effect beyond 10% to BIPOC or low-income populations

Communities Living Near Transit

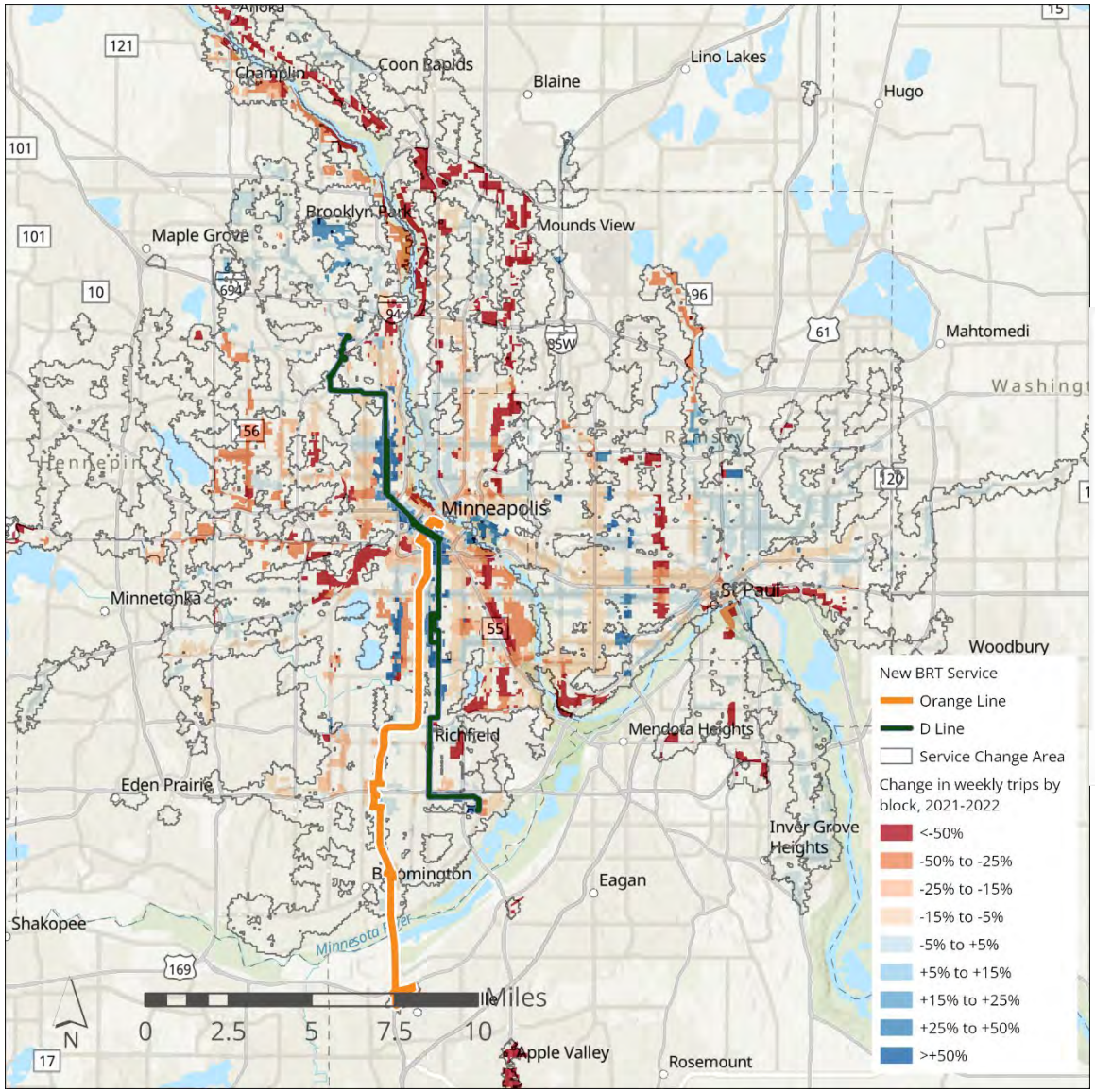


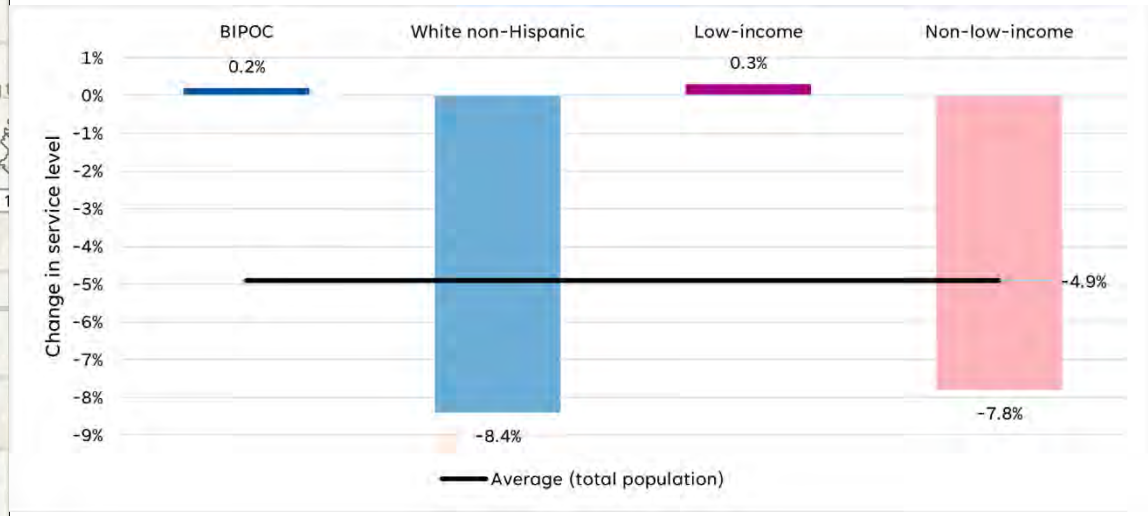
Communities of Color



Low-income communities

Change in Service Availability: Dec 2021 vs Dec 2022



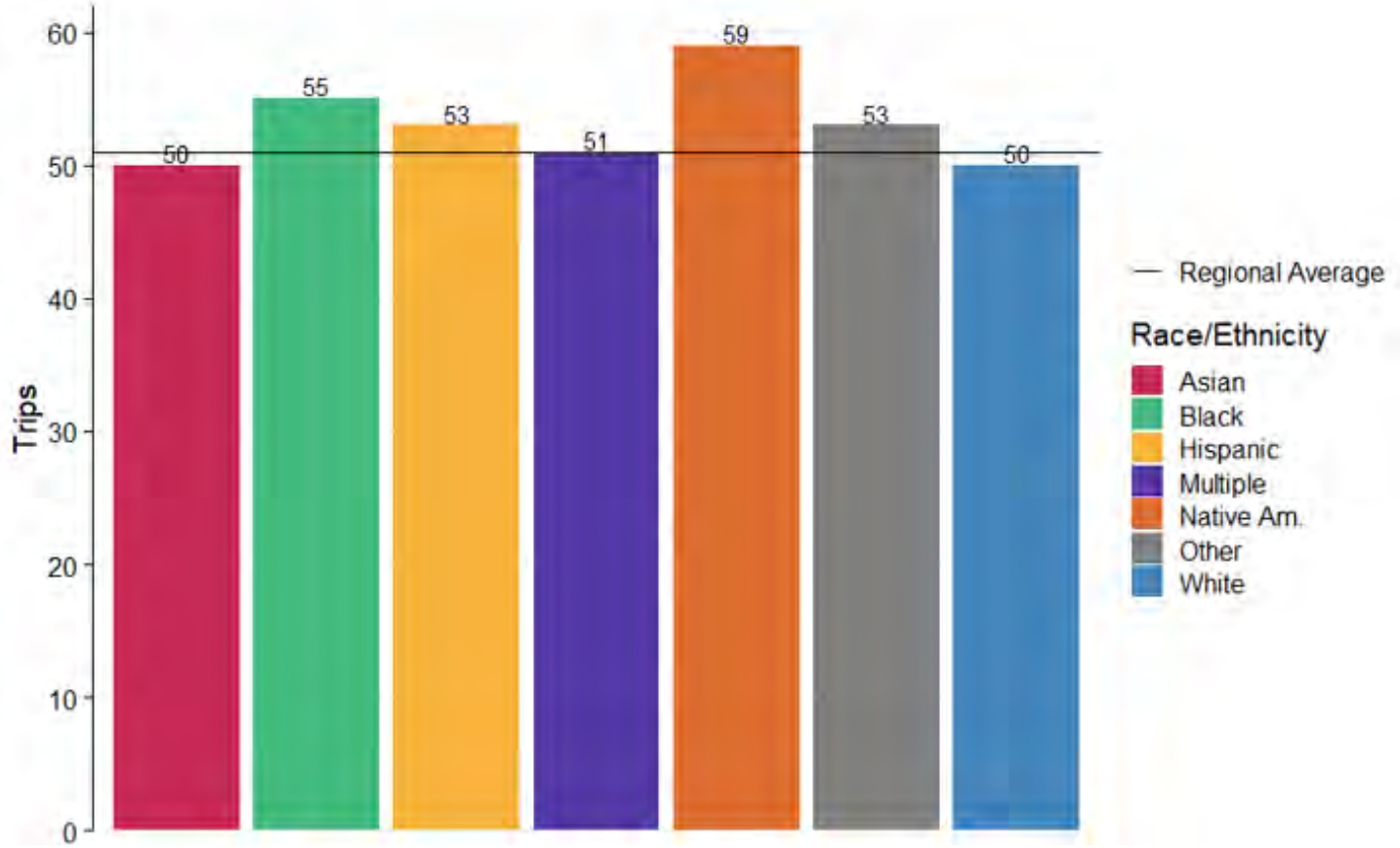


Service Metrics by Race & Ethnicity

- Service Availability
  - Trip Count
  - Frequent Service
- Service Reliability
  - On-time Performance
  - Service Delivered (Trip Cuts)
- Service Outcomes
  - Access to Jobs

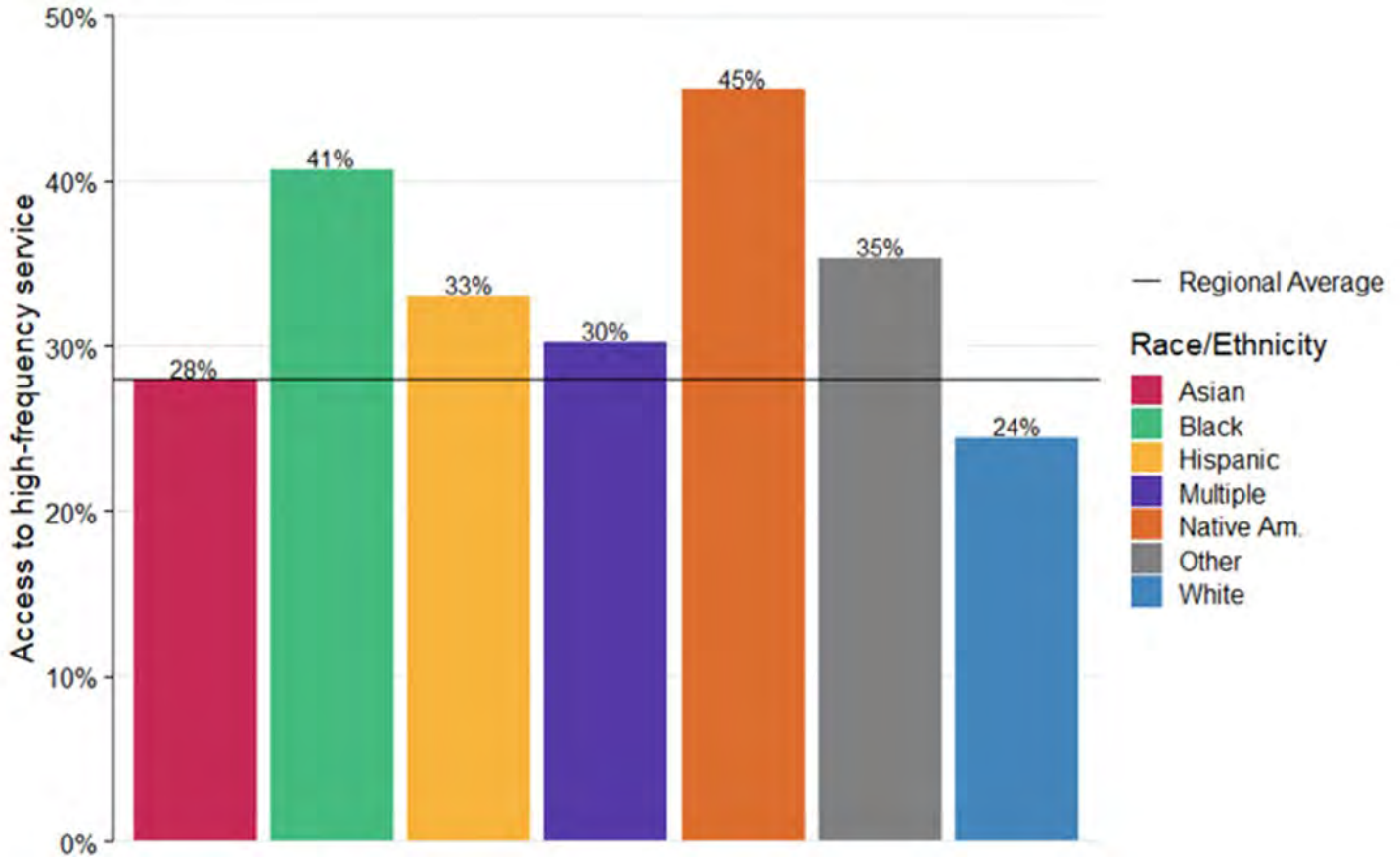
Service Availability by Race & Ethnicity: Trip Count

Residents identifying as Black or Native American had access to **more trips** compared to other groups, on average.



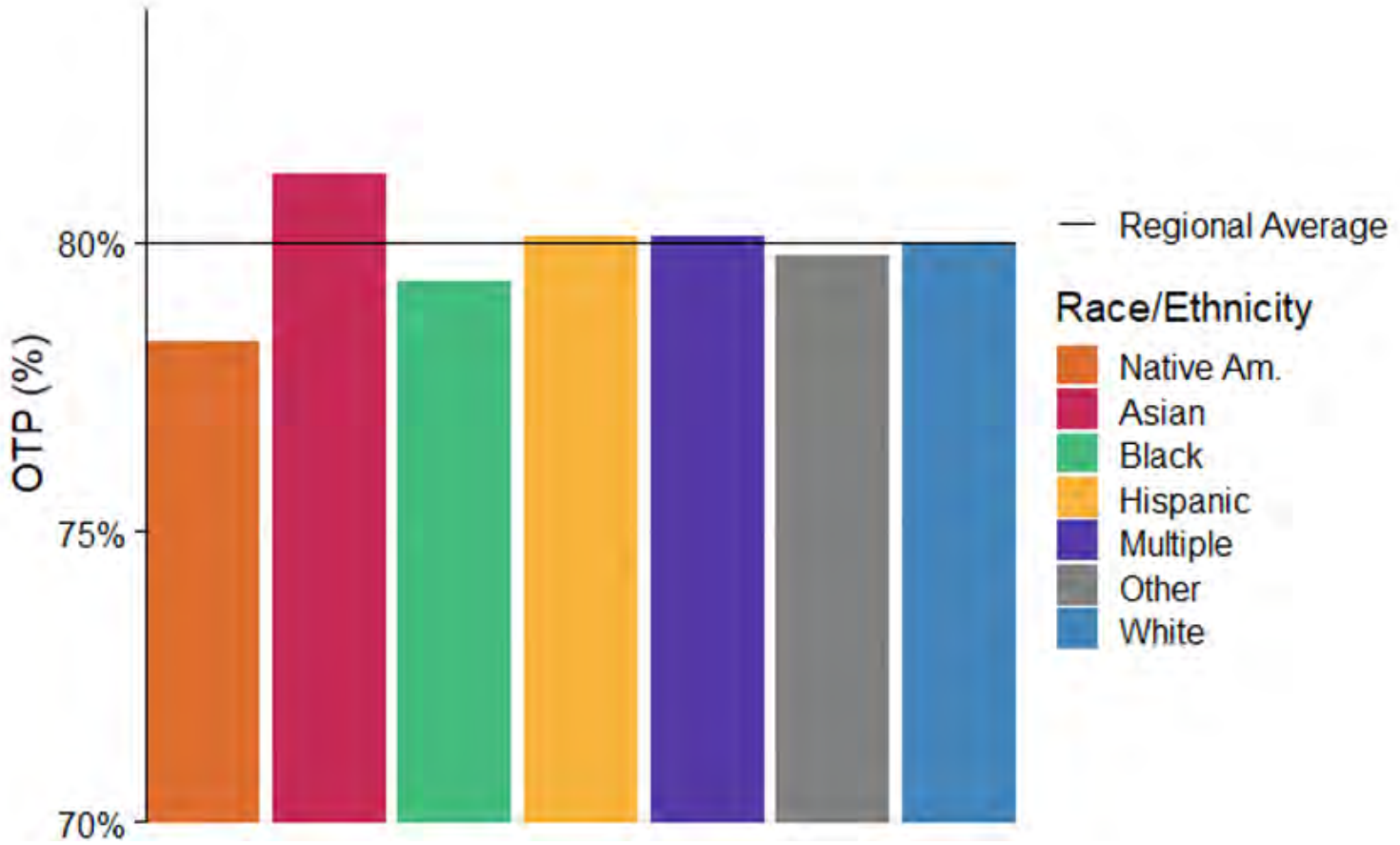
Service Availability by Race & Ethnicity: High Frequency Service

A **larger percent** of residents identifying as Black or Native American had access to high-frequency service.



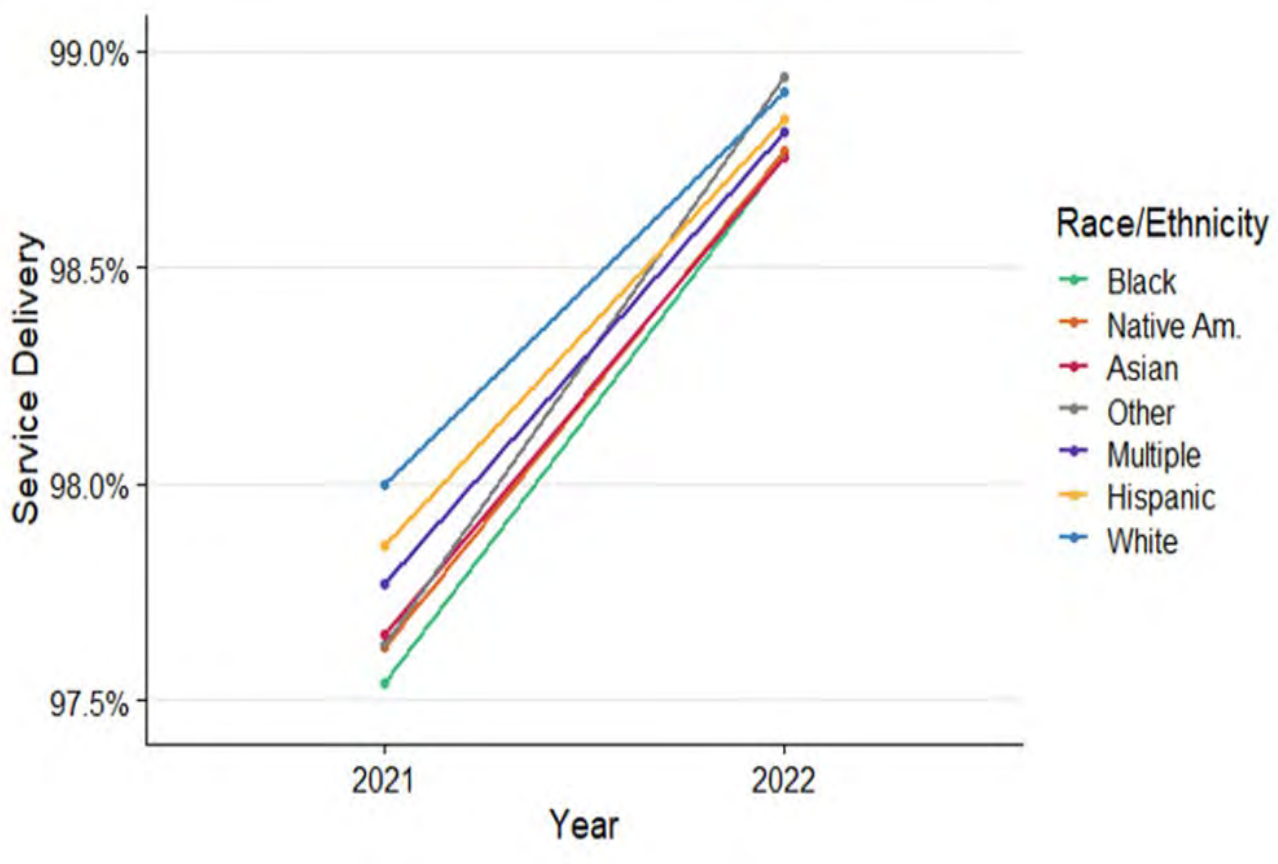
Service Reliability by Race & Ethnicity: On-Time Performance

Residents identifying as Black or Native American had access to **less reliable (on-time)** service compared to all residents living near stops and stations, on average.



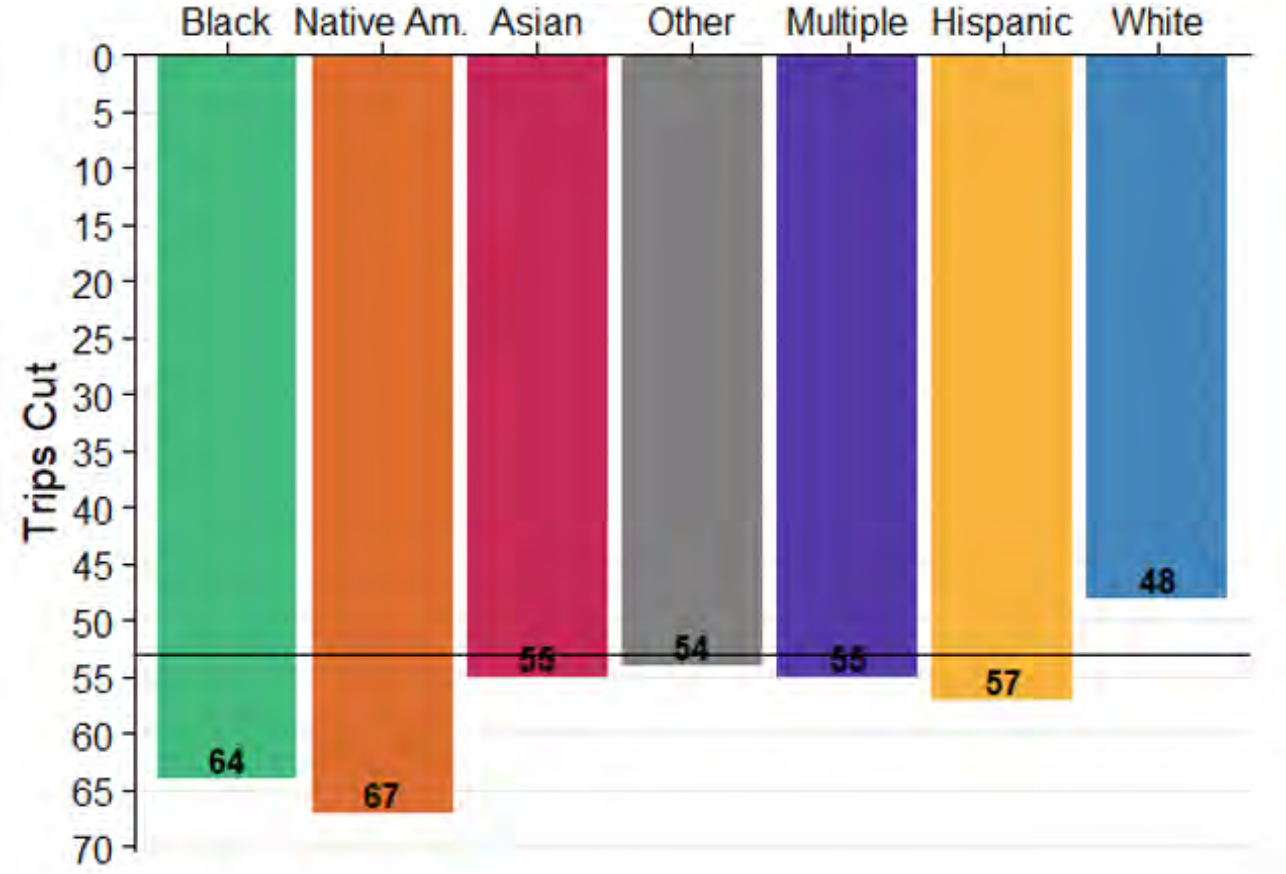
Service Reliability by Race & Ethnicity: Scheduled Service Delivered

All residents had access to **more reliable (% service delivered)** service in Fall 2022. Residents identifying as White had access to 0.15% more reliable (% service delivered) service compared to residents identifying as Black, Native American, Asian, or Hispanic.



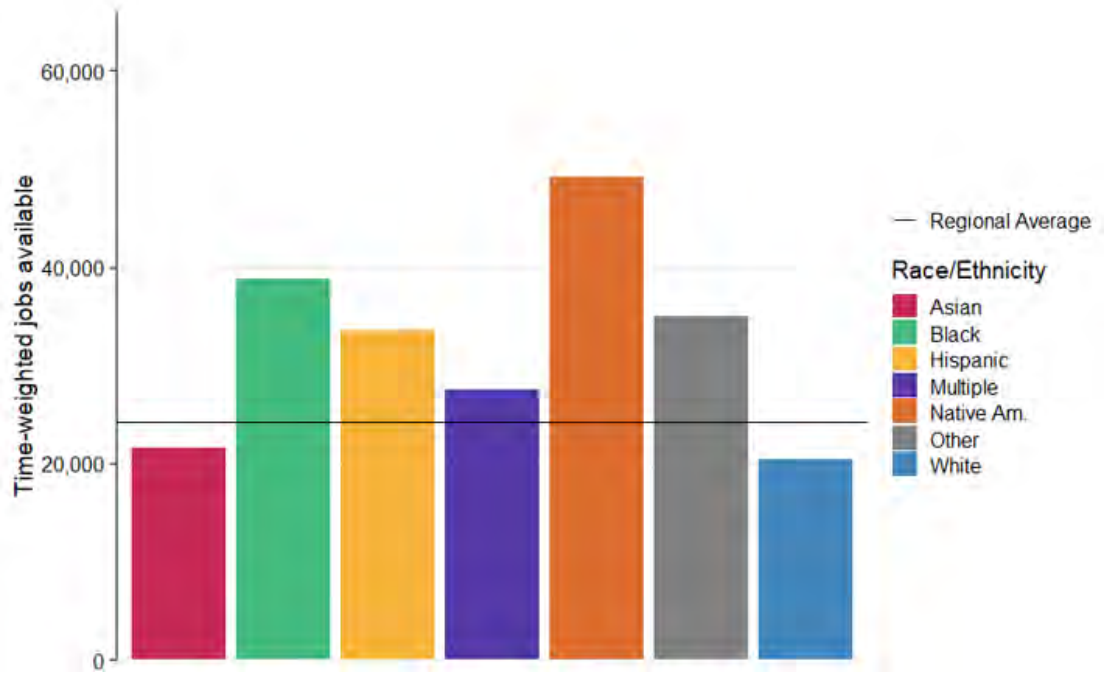
Service Reliability by Race & Ethnicity: Fall 2022 Cut Trips

Residents identifying as Black and Native American had **more trips** cut at the stops and stations nearby compared to other groups.



Service Outcomes by Race & Ethnicity: Access to Jobs

Residents identifying as Black, Native American, and Hispanic had **more jobs** accessible by transit compared to other groups.





Time-weighted access to jobs, Weekday Midday service, August 2022 Pick

2022 Equity Practices in Service Planning

- Title VI Practices
  - Adjusted disparate impact/disproportionate burden threshold as part of Title VI Plan update
  - Approved the results from the Service Monitoring Study
  - Conducted SEAs for new METRO D Line corridor changes and all December 2022 service changes
- Routine Practices
  - Transit Equity Statement
  - Network Now
  - Customer Surveys
  - Prioritizing Speed and Reliability Improvements

Proposed Action 2023-210

That the Metropolitan Council approve the results of the 2022 Title VI Service Equity Analysis (SEA) for the 2022 Service Equity Evaluation (SEE) Report.

Thank You!

Celina Martina

Celina.martina@metrotransit.org

612-349-7582

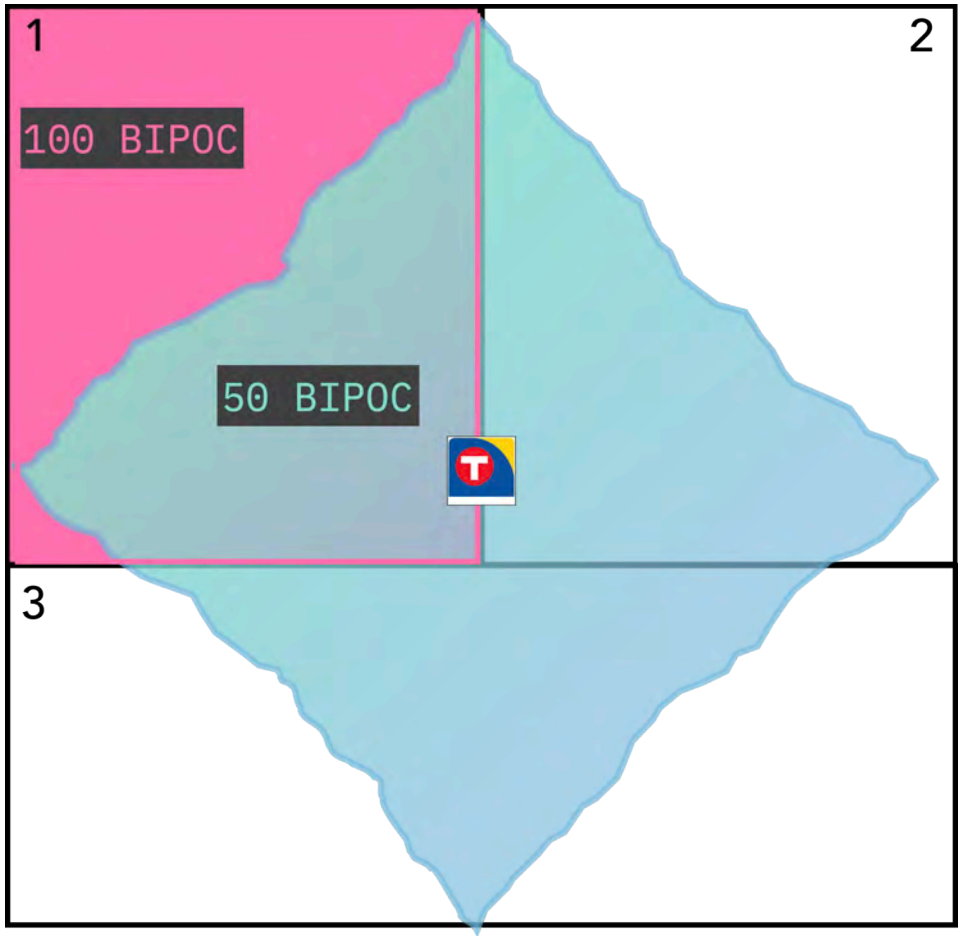
Victoria Dan

Victoria.dan@metrotransit.org

612-349-7648

Assigning Demographics

Block-group	Walkshed in block-group	BIPOC in Isochrone	White in Isochrone
1	50%	0.50 x 100 = 50	0.50 x 1000 = 500
2	50%	0.50 x 500 = 250	0.50 x 500 = 250
3	33%	0.33 x 1000 = 333	0.33 x 100 = 33
Walkshed:		50 + 250 + 333 = **633**	500 + 250 + 33 = **783**





2022 Annual Service Equity Evaluation

October 2023

Metro Transit

Table of Contents

Introduction **3**

2022 Service Changes **3**

Overview 3

Phase I – January-March 4

Phase II – March-August 6

Phase III – August-December 6

Looking Ahead: Changes Beyond 2022 7

2022 Ridership Trends and Distribution **8**

Title VI Service Equity Analysis **9**

Framework for Evaluating Impacts 10

Scenarios 10

Data 10

Results 14

2022 Service Metrics, Disaggregated by Race **16**

Service Metric Principles 16

Service Availability 17

Service Utility 18

Service Reliability 20

Current Equity Practices in Service Planning **23**

Title VI Program 23

Routine Practices 25

Appendix **27**

Introduction

Metro Transit is committed to delivering transit service that supports the Metropolitan Council's Thrive Equity outcome. To improve transparency of service-related decisions, the agency has committed to producing an annual report assessing service equity. This annual report contains five main components:

- A description of service changes implemented throughout 2022,
- A summary of ridership trends in 2022,
- Results of the formal Title VI service equity analysis of 2022 service changes,
- Metrics evaluating the equity of service availability, utility, and reliability, and
- Current equity practices in service design.

In 2022, COVID-19 and the ongoing operator shortage continued to impact Metro Transit service and ridership. Although public health improvements made it possible for more people to safely return to in-person activities such as work and school, work-from-home and other pandemic-era behaviors persisted. Meanwhile, Metro Transit's workforce shortage did not improve, despite efforts to increase wages and recruit more drivers. Staffing levels remained below required levels until December 2022. Major drivers of service changes in 2022 included:

- Limited operator availability due to industry-wide shortages, and
- Launch of METRO D Line, which significantly replaced local corridor service.

2022 Service Changes

Overview

Compared to December 2021, Metro Transit scheduled 15% fewer trips overall in December 2022 due to the workforce shortage. Despite efforts to increase wages and recruit more operators, staffing levels remained below required levels until December 2022. Service changes impacted nearly all route types in the network, except commuter rail which continued to operate the same reduced schedule throughout 2022.[1] METRO Bus Rapid Transit (BRT) added trips primarily due to the launch of METRO D Line, which significantly replaced local route service in the corridor. Trip counts for core local, suburban local, supporting local, and commuter routes reflect reductions made in late 2022. Figure 1 depicts the change of weekday trip counts across route classifications. Descriptions of changes throughout 2022 are broken out into Phases I, II, and III in the following sections.

1 As described in Appendix G of the 2040 Transportation Policy Plan, routes in the regional transit network are classified based on their mode and role within the overall network.

Where service reductions were made, Metro Transit used these principles to guide decision making:

- Maintain the reliability of scheduled service.
- Identify service where customers have alternative trip times or routes, or where populations are more likely to have access to a private vehicle in their household.
- Minimize ridership impact.
- Preserve frequent transit service (every 10 to 15 minutes).
- Evaluate service changes with an eye towards reducing impact on low-income populations and communities of color.

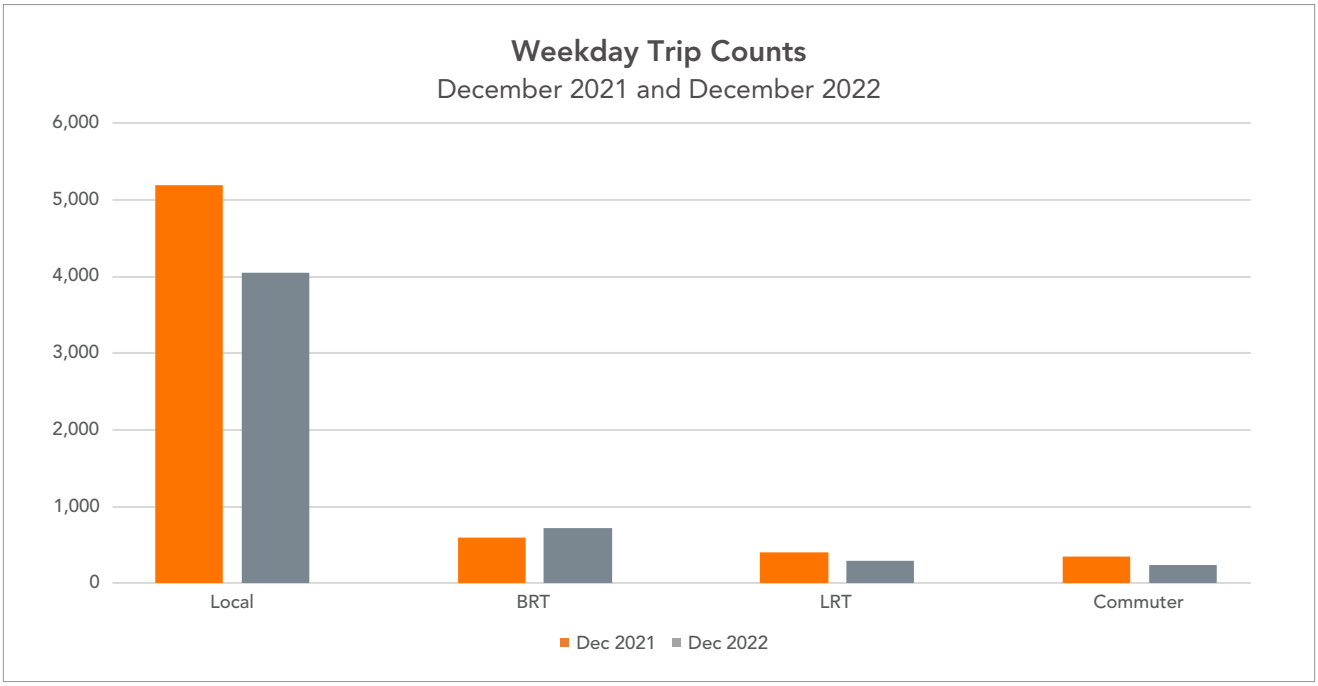


Figure 1. Weekday Trips by Route Classification, December 2021 and December 2022

Phase I – January-March

Service levels established in late 2021 continued through mid-March 2022. Figure 2 shows weekday service availability by stop in December 2021 that carried through early 2022.

METRO Bus Rapid Transit lines and Local Bus

- METRO Orange Line, which opened in December 2021, operated every 15 minutes on weekdays and every 30 minutes on weekends.
- A Line operated every 12 minutes all days.
- C Line operated every 10 minutes all days.
- Twelve local routes remained suspended. (12, 16, 19, 39, 59, 84, 129, 223, 415, 604, 825, Green Line late-night bus)

Commuter and Express Bus

- Limited service on some rush hour-only commuter and express routes continued.
- Service on Route 115 was restored.
- Fifty-two commuter and express routes remained suspended. (53, 111, 118, 133, 134, 135, 141, 146, 156, 261, 262, 263, 265, 272, 288, 350, 351, 355, 361, 364, 365, 375, 417, 452, 467, 552, 553, 554, 558, 579, 587, 588, 589, 643, 652, 663, 664, 668, 670, 671, 672, 674, 677, 679, 756, 758, 762, 765, 767, 854, 860, 865)

METRO Light Rail Transit Blue and Green lines

- Service operated every 12 minutes for most hours, seven days per week.
- Hours of service spanned 4:30 a.m. to midnight.

Service on Northstar Commuter Rail continued to operate two morning inbound trips and two afternoon outbound trips each weekday, with no weekend service.

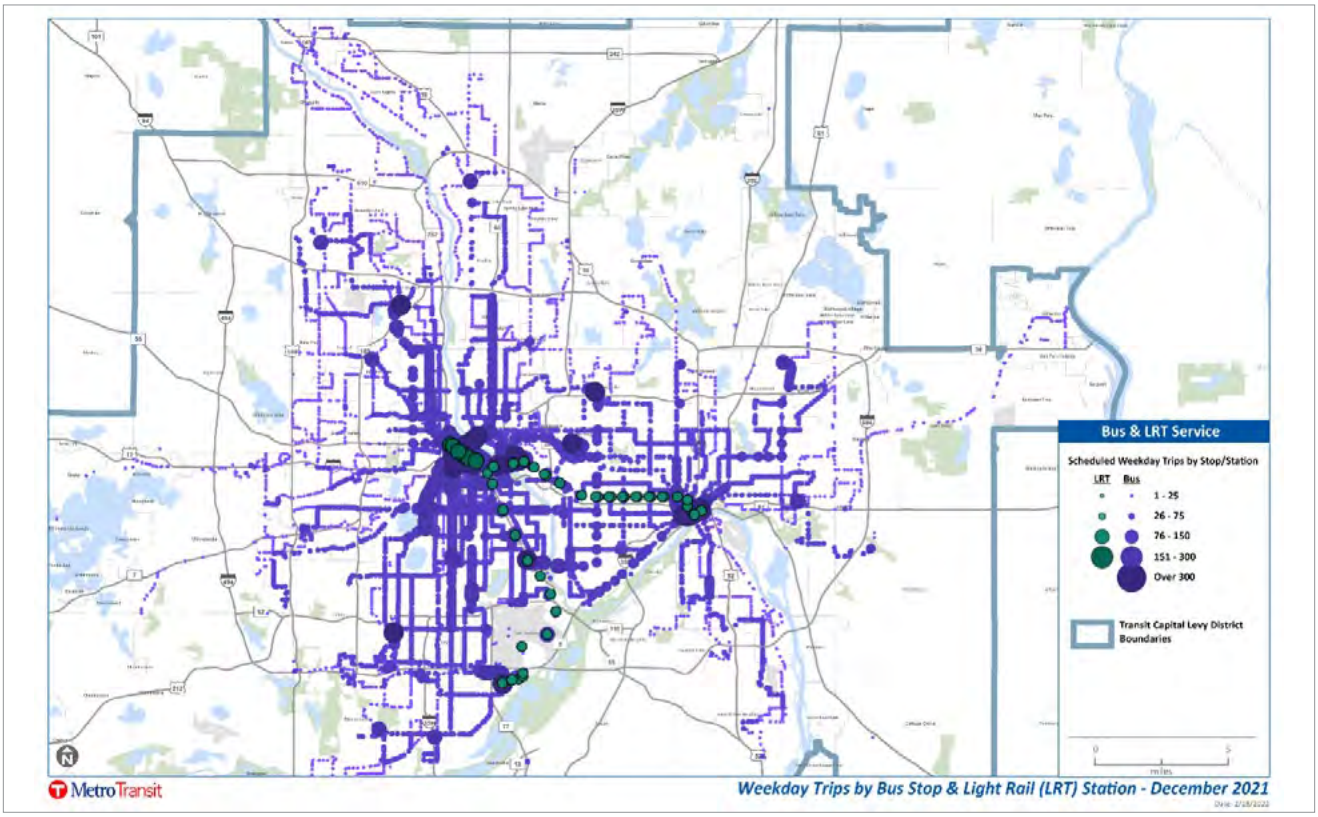


Figure 2. Weekday Trips by Bus Stop & Light Rail (LRT) Station, December 2021

Phase II – March-August

In March 2022, service was reduced throughout the region by four percent.

- Low ridership branches on three routes were suspended.
- Frequency dropped on the busiest bus routes, usually from 10 minutes to 15 minutes, 15 minutes to 20 minutes, and 20 minutes to 30 minutes.
- Service for high schools and the University of Minnesota was reduced.

Later, Blue Line was closed between Terminal 2 and Mall of America from July through early October for maintenance and construction. A bus bridge served this segment.

Phase III – August-December

In the second half of 2022, the workforce shortage continued, resulting in minor reductions in the summer and fall. Unfortunately, the reliability of service continued to decline, with additional reductions in October and December 2022 resulting in the lowest level of service operated since the pandemic began.

- In August, LRT service was reduced to every 15 minutes. Limited service on Commuter Route 467 was restored.
- In October, two more routes (27, 831) were suspended, and service on five routes was reduced to every two hours.
- In December, there was an 8% reduction in service around the region.
  - Two more routes were suspended on weekdays (115, 547), and two more on weekends (534, 804 Sunday).
  - Service was restructured/suspended on eight routes.
  - Frequency was reduced on 37 routes, including 11 commuter routes and Orange Line during weekday midday.
  - The D Line opened, mostly replacing service on other local routes in the Emerson/Fremont and Chicago Avenue corridors.

Figure 3 shows the weekday service availability by stop in December 2022.

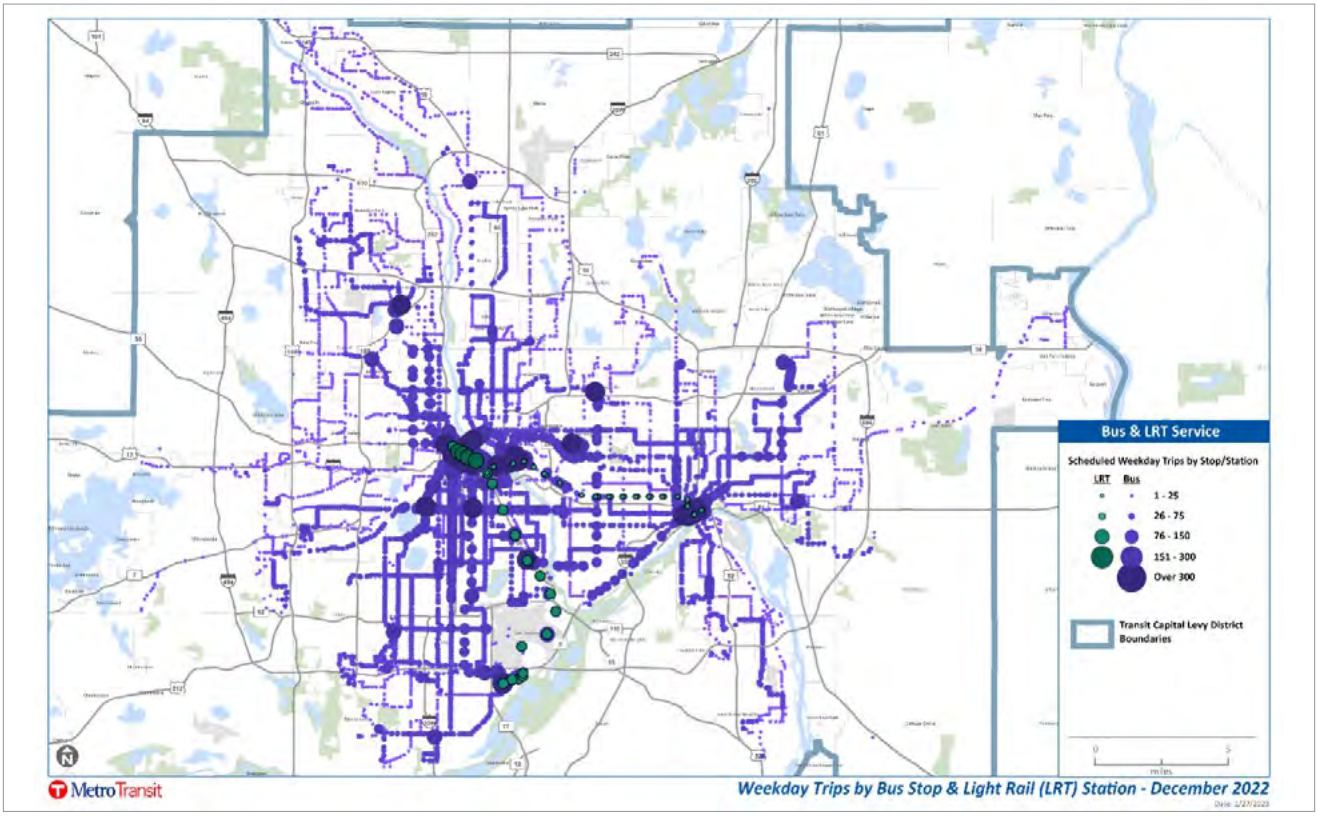


Figure 3. Weekday Trips by Bus Stop & Light Rail (LRT) Station, December 2022

Looking Ahead: Changes Beyond 2022

Service changes in 2023 are highly dependent on Metro Transit's ability to hire enough operators and support staff to compensate for attrition and grow the workforce. The workforce situation started to improve in 2023, and modest service improvements were made in June and August 2023. Metro Transit's Network Now project is the process to identify service changes and improvements through 2027 in light of new transitways and significant changes in travel patterns and transit demand. In the meantime, the following working guidelines are being used for service planning decisions between 2023 and mid-2024, when the Network Now plan will be completed:

- Maintain service reliability so that all scheduled trips operate.
- Build on success by improving frequency on the routes with the highest ridership or where ridership is growing quickly.
- Prioritize access for those who rely on transit the most, including lower-income groups and communities of color.
- Prepare for transitways under construction or planning to open in 2025.
- Consider customer input.
- Prioritize routes where riders have no or few alternatives.
- Balance network frequency and coverage improvements.

2022 Ridership Trends and Distribution

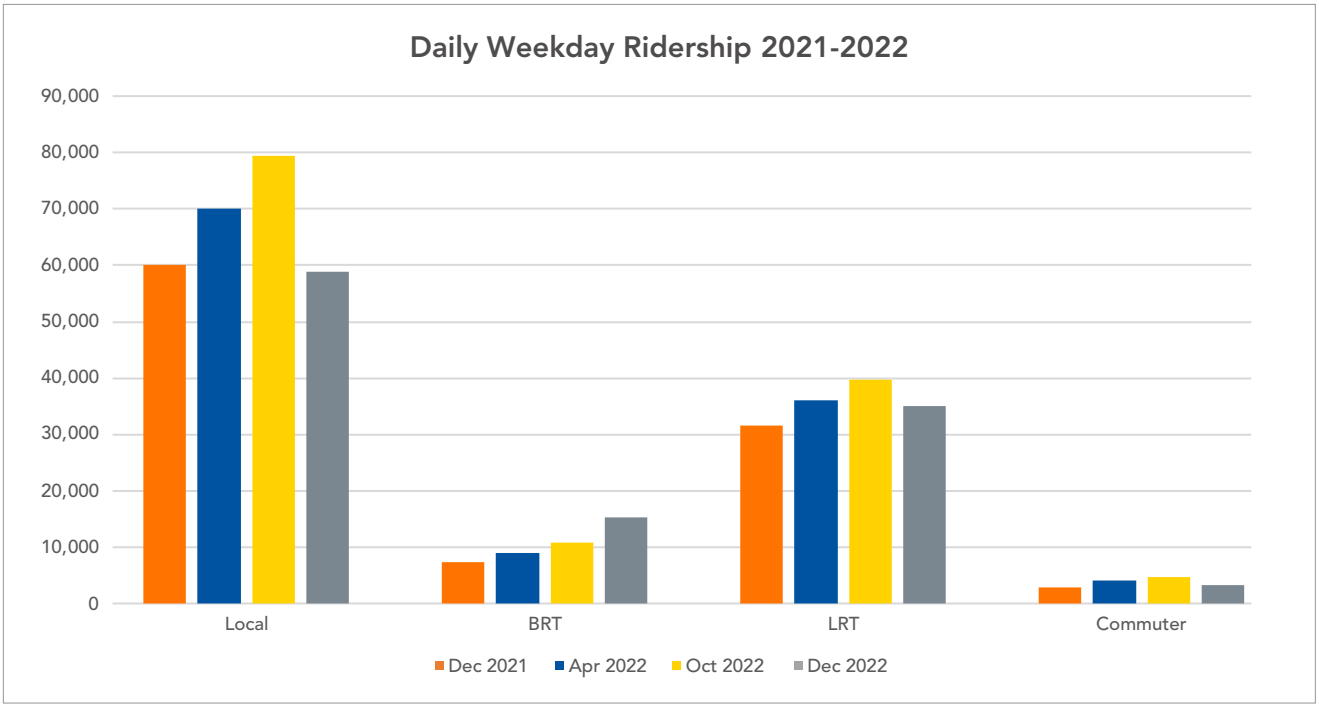


Figure 4. Average Weekday Ridership by Route Classification in December 2021, April 2022, October 2022, and December 2022

As shown in Figure 4, daily ridership generally trended upward from December 2021 through October 2022. Over time, ridership is typically seasonal and cyclical, where systemwide ridership tends to be higher in spring and fall compared to winter. Universal Pass launched at the University of Minnesota, providing expanded transit access to students beginning that fall. As the year ended, ridership contracted on all modes except BRT, demonstrating the combined impacts of seasonal ridership fluctuations, significant service reductions, and the launch of METRO D Line.

Throughout 2022, METRO BRT had the steadiest ridership growth; LRT ridership gained net ridership; and local and commuter route ridership changed marginally overall.

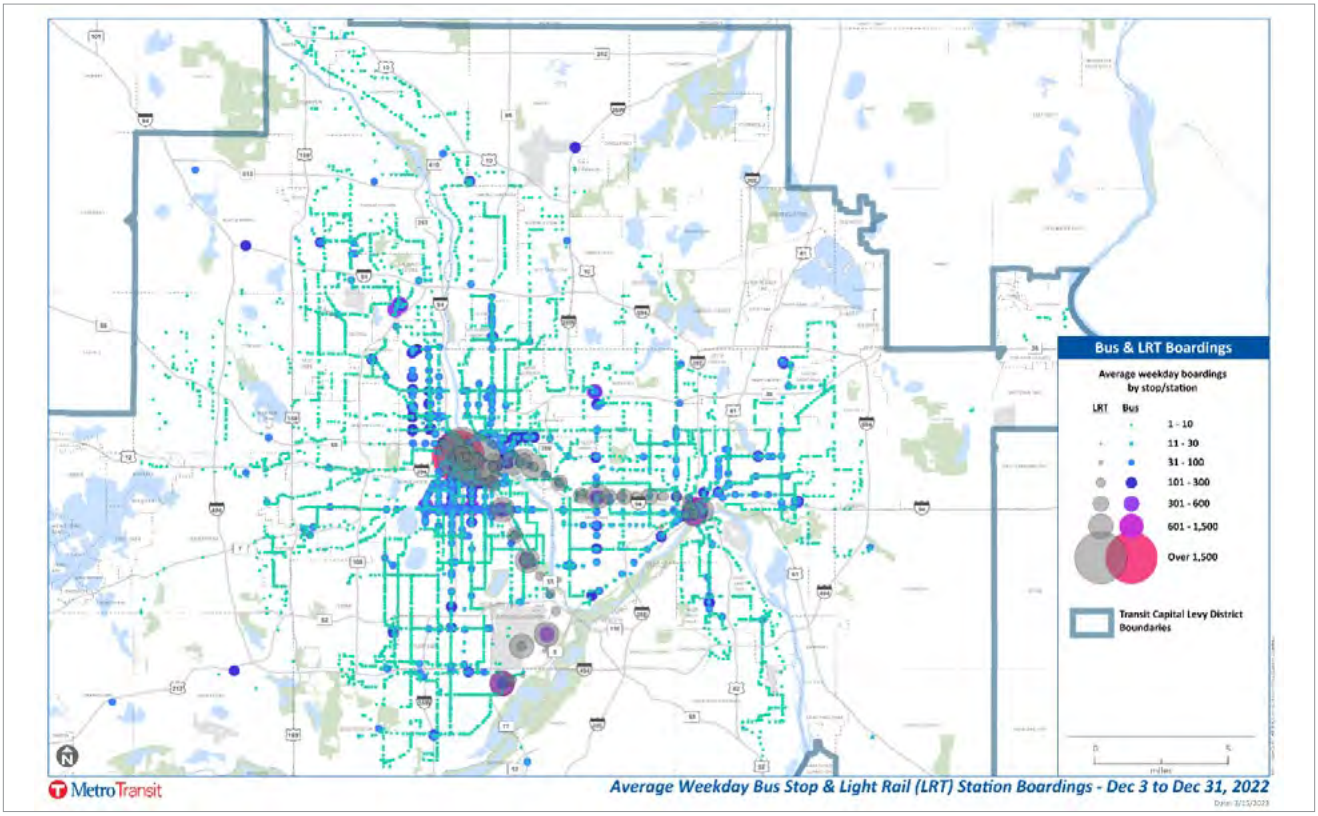


Figure 5. Average Weekday Bus and LRT Boardings by Stop, December 2022

As in 2021, ridership in 2022 continued to be concentrated in major local and METRO corridors and at regional destinations and transfer points (Figure 5).

Title VI Service Equity Analysis

The Federal Transit Administration (FTA) requires transit agencies to show that they are not discriminating against communities of color and lower-income groups when providing transit service. This analysis is known as a Title VI Service Equity Analysis (SEA). This document includes a summary of the methodology and results, and the full report is available online.

The SEA reviewed Metro Transit's service changes from December 2021 to December 2022 to understand how service availability – or access to transit – may have changed for residents and the extent to which impacts differed between Black, Indigenous, and people of color (BIPOC) and White non-Hispanic residents, and between low-income and non-low-income residents. Per FTA guidance in the Title VI Circular, Metro Transit's Title VI work refers to all non-White, non-Hispanic persons as BIPOC rather than breaking down the analysis any further to separate out communities of color by specific race.

Framework for Evaluating Impacts

Consistent with Metro Transit's Title VI Policy, the impact of service changes is measured by the change in service availability – or access to transit. Put another way, the analysis quantifies how much transit service is within a reasonable walk or roll from one's home, and how that has changed. 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. The SEA reviewed the extent to which the percent change in 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.

Following FTA guidelines, Metro Transit uses a threshold to determine when differences are significant enough to result in potential discrimination. "Disparate impact" refers to race discrimination, while "disproportionate burden" refers to income discrimination. In 2022, the Metropolitan Council updated "DI/DB" policy to redefine disparate impact and disproportionate burden as a difference greater than ten percent. If adverse or beneficial effects of service changes borne by BIPOC or low-income groups are not within ten percent of the effects borne by White or non-low-income groups (respectively), then the changes would pose a potential disparate impact or disproportionate burden. Council policy does not consider a beneficial effect beyond ten percent difference to BIPOC and low-income populations as evidence of potential discrimination.

Scenarios

The SEA explored the potential for discrimination resulting from cumulative 2022 service changes under two scenarios:

1. Three-year Change (September 2019 to December 2022): Measuring changes in access to transit service since before the COVID-19 pandemic.
2. One-year Change (December 2021 to December 2022): Measuring changes in access to transit service when schedules were adjusted due to the operator shortage and the opening of D Line.

Data

Figure 6 and Figure 7 show the geographic distribution of BIPOC and White residents, and low-income and non-low-income residents, respectively, in areas served by Metro Transit bus or rail service.

These demographic data are then linked with the service data from September 2019, December 2021, and December 2022 to understand the extent to which the magnitude of service changes varied between different groups. Figure 8 and Figure 9 show the change in weekly scheduled trips available in residential areas. These maps show the underlying variation in the direction (increase or decrease) and magnitude (small or large) of the service changes. Areas with no residents and places not served by fixed routes are not shown on the maps, as these do not affect the results.

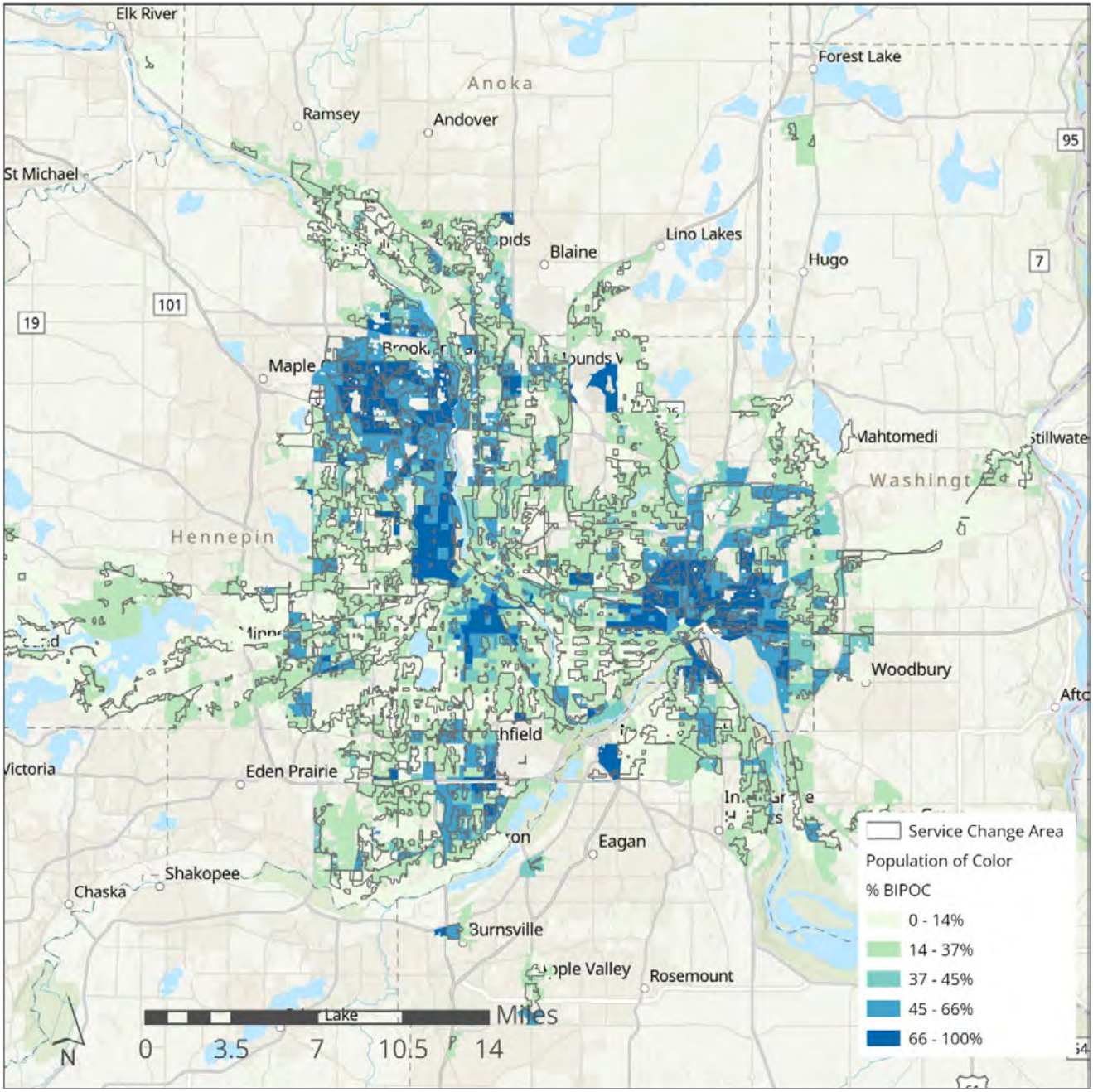


Figure 6. Residents Served by Metro Transit Fixed Routes: BIPOC Populations, ACS 2017-2021

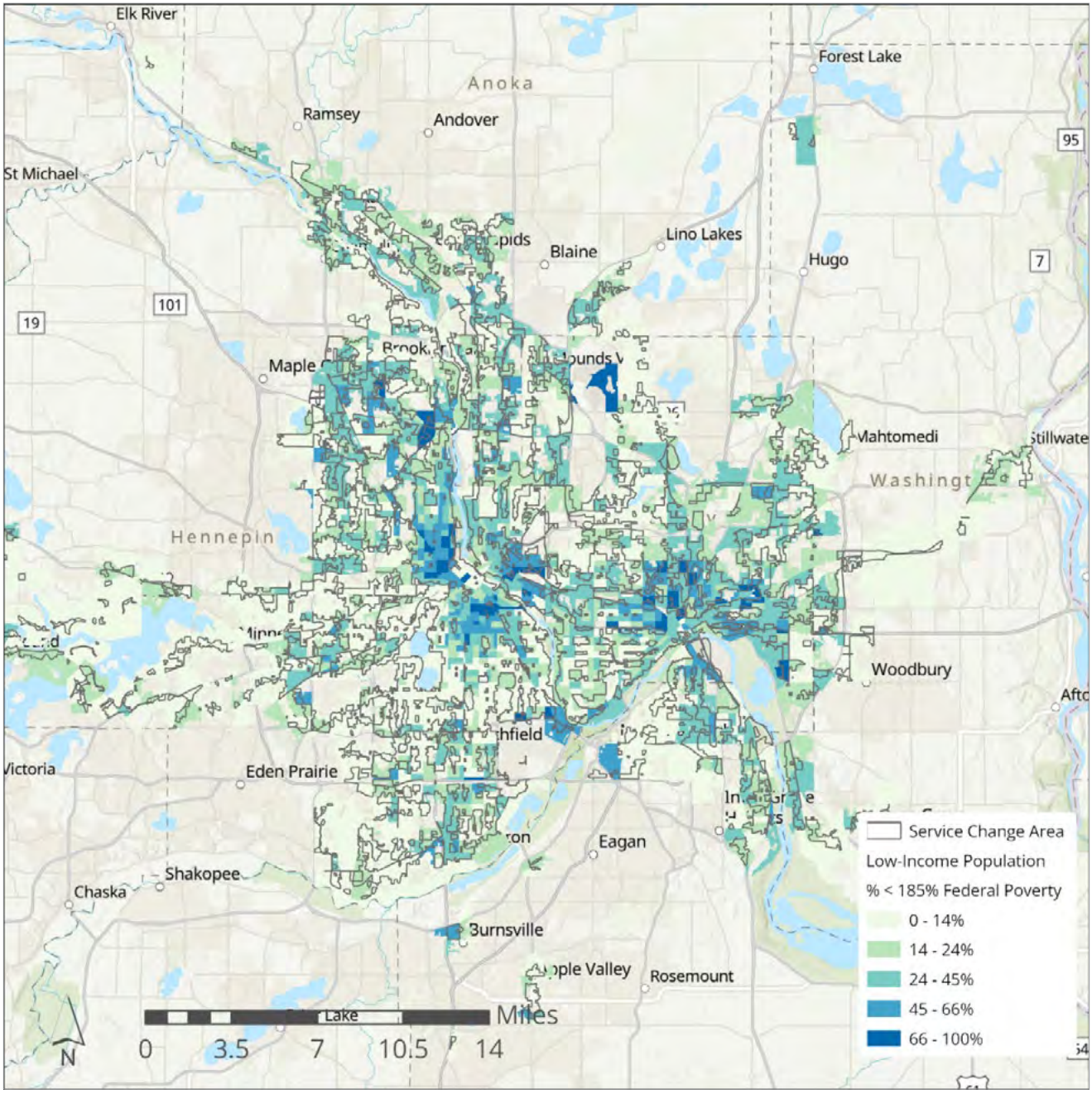


Figure 7. Residents Served by Metro Transit Fixed Route: Low-Income Populations, ACS 2017-2021

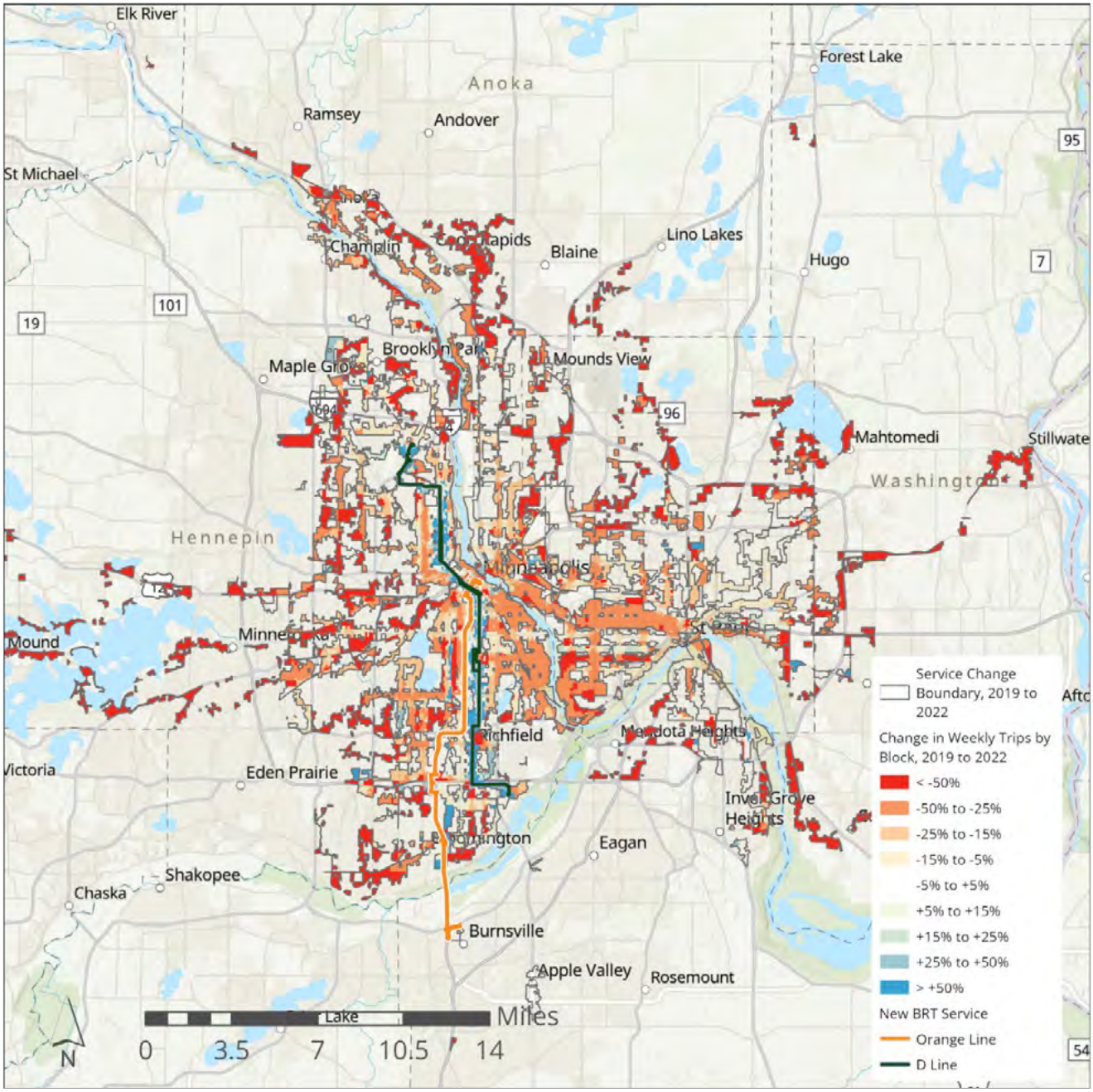


Figure 8. Percent Change in Service by Census Block: September 2019 to December 2022

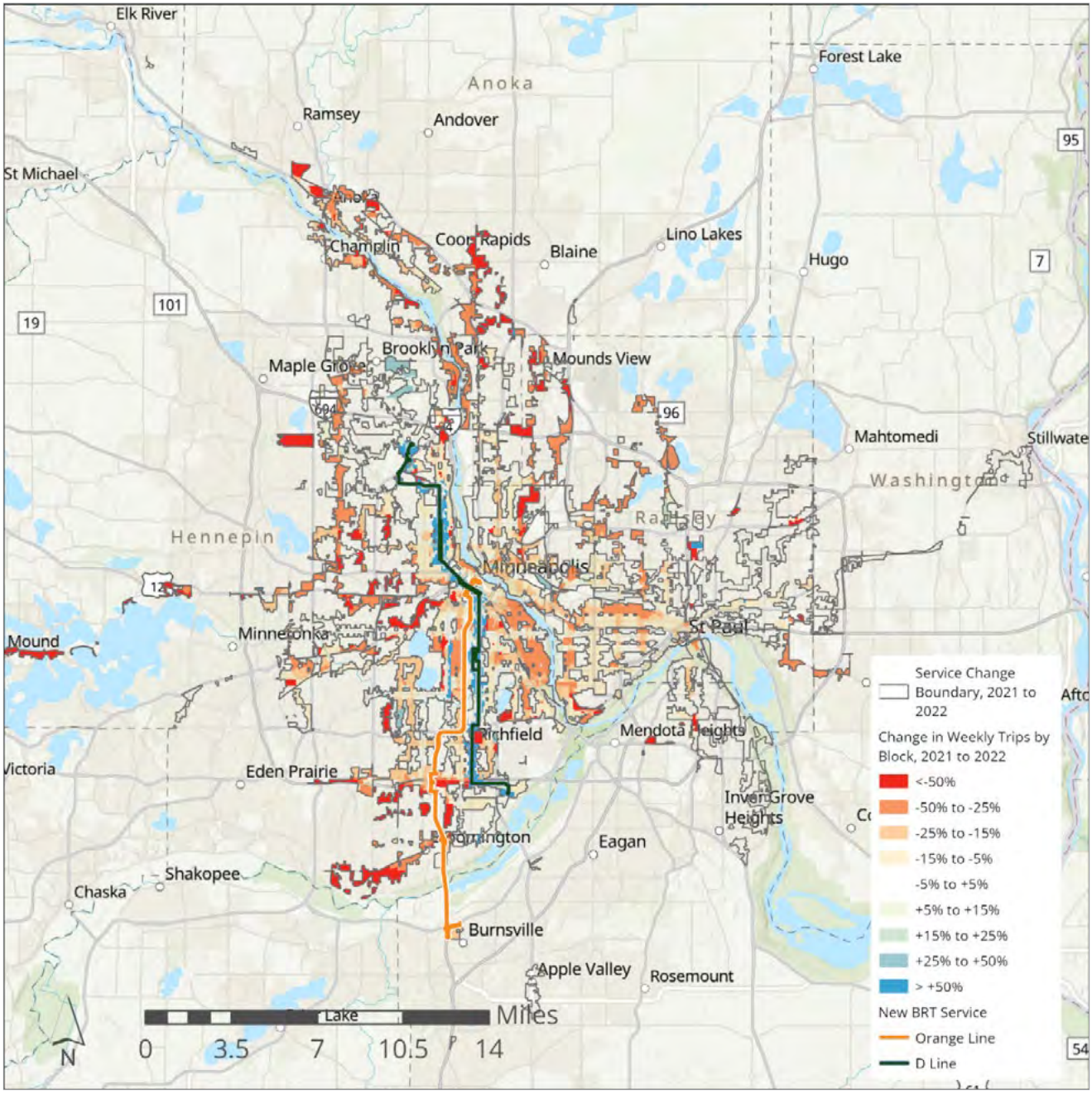


Figure 9. Percent Change in Service by Census Block: December 2021 to December 2022

Results

Three-Year Change (September 2019 to December 2022)

In December 2022 compared to September 2019, the average resident served by Metro Transit experienced a 24.6% decrease in the number of weekly scheduled trips near their home (Figure 10). The average White non-Hispanic resident experienced a decrease of 29.6%, and the average non-low-income resident experienced a decrease of 27.1%. Meanwhile, BIPOC and low-income

residents respectively experienced a 17.2% and 17.9% decrease in available service. These results indicate no disparate impact on BIPOC residents and no disproportionate burden on low-income residents due to service changes between September 2019 and December 2022.

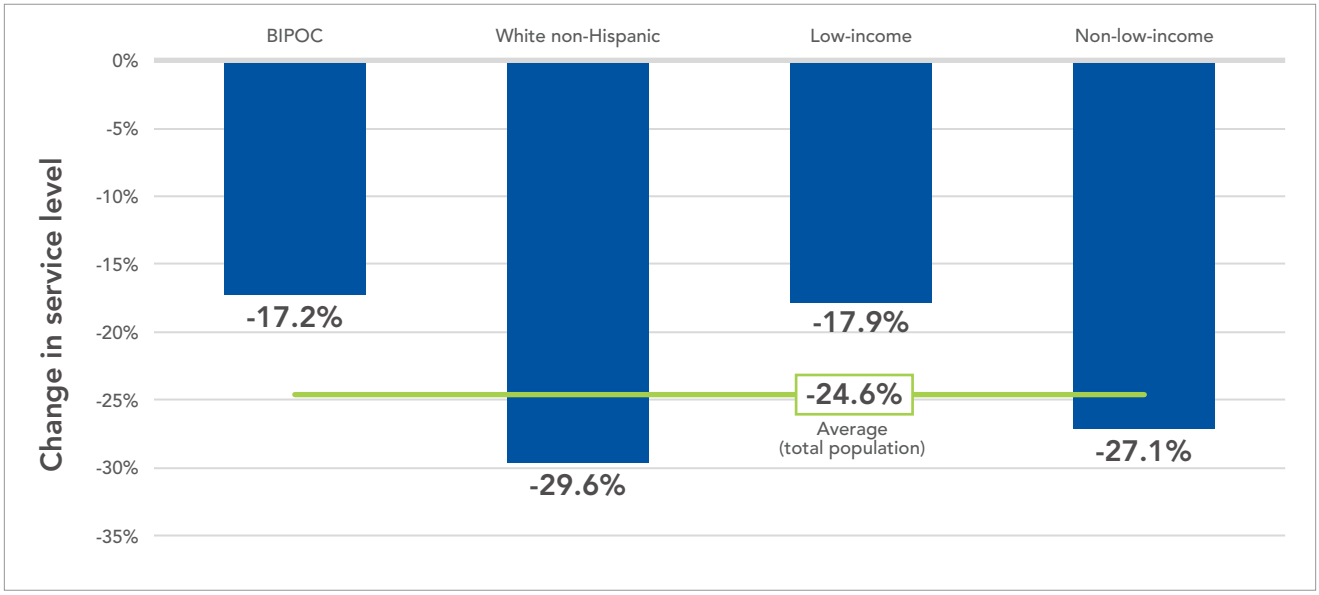


Figure 10. Average Percent Change in Access to Transit Service: September 2019 to December 2022

One-Year Change (December 2021 to December 2022)

In December 2022 compared to December 2021, the average resident served by Metro Transit experienced a 9.6% decrease in the number of weekly scheduled trips near their home (Figure 11). The average White non-Hispanic resident experienced a decrease of 13.0%, and the average non-low-income resident experienced a decrease of 11.2%. Meanwhile, BIPOC and low-income residents respectively experienced 4.8% and 5.8% decreases in available service. These results indicate no disparate impact on BIPOC residents and no disproportionate burden on low-income residents due to service changes in 2022. Though facing significant workforce challenges in 2022, Metro Transit protected BIPOC and low-income communities from larger effects of service reductions, in alignment with the agency's equity goals and our guiding principle to minimize impacts on these groups.

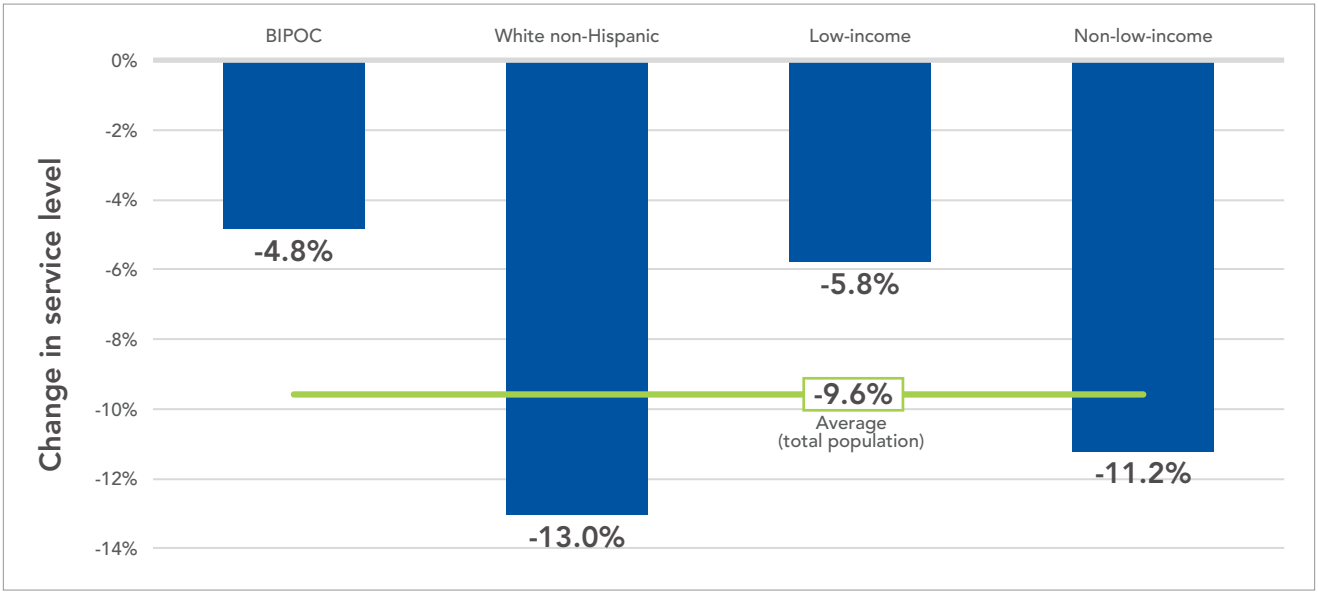


Figure 11. Average Percent Change in Access to Transit Service: December 2021 to December 2022

2022 Service Metrics, Disaggregated by Race

Service metrics quantify how communities experience transit service at their stops. This approach considers who benefits from service and how transit connects people to opportunities. Reporting performance, disaggregated by race, is one of the ways Metro Transit demonstrates a commitment to equity and transparency. This practice helps to identify areas where White non-Hispanic residents may be experiencing higher quality service compared to BIPOC residents.

Service Metric Principles

Core Metrics

A core set of metrics establish the foundation for historical review and transparency. Metro Transit measures the following core metrics every year using the same methodology and consistent data sources:

- Service availability (count of scheduled trips),
- Service utility (access to frequent service and jobs), and
- Service reliability (on-time performance, cut trips).

These metrics help convey the volume and utility of provided service. Metro Transit customers are more likely to choose transit where and when it connects with destinations regularly and reliably.

Replicability

Methodology is documented, repeatable, and consistent over time. Sources include the U.S. Census American Community Survey (ACS, five-year rolling average) for demographic data and established service databases for performance data. Metro Transit prioritizes consistent methodology when reporting so trends are measurable and analyses are repeatable. The methodology for each metric and data source is described in the Appendix.

Service Availability

Count of Scheduled Trips

The count of scheduled trips is an indicator of how much service is expected to be available. Typically, residents living near a stop with one hundred trips available are more likely to ride transit compared to residents living near a stop with only a couple of trips available. Although transit supply does not wholly predict transit ridership, it is necessary to build demand.

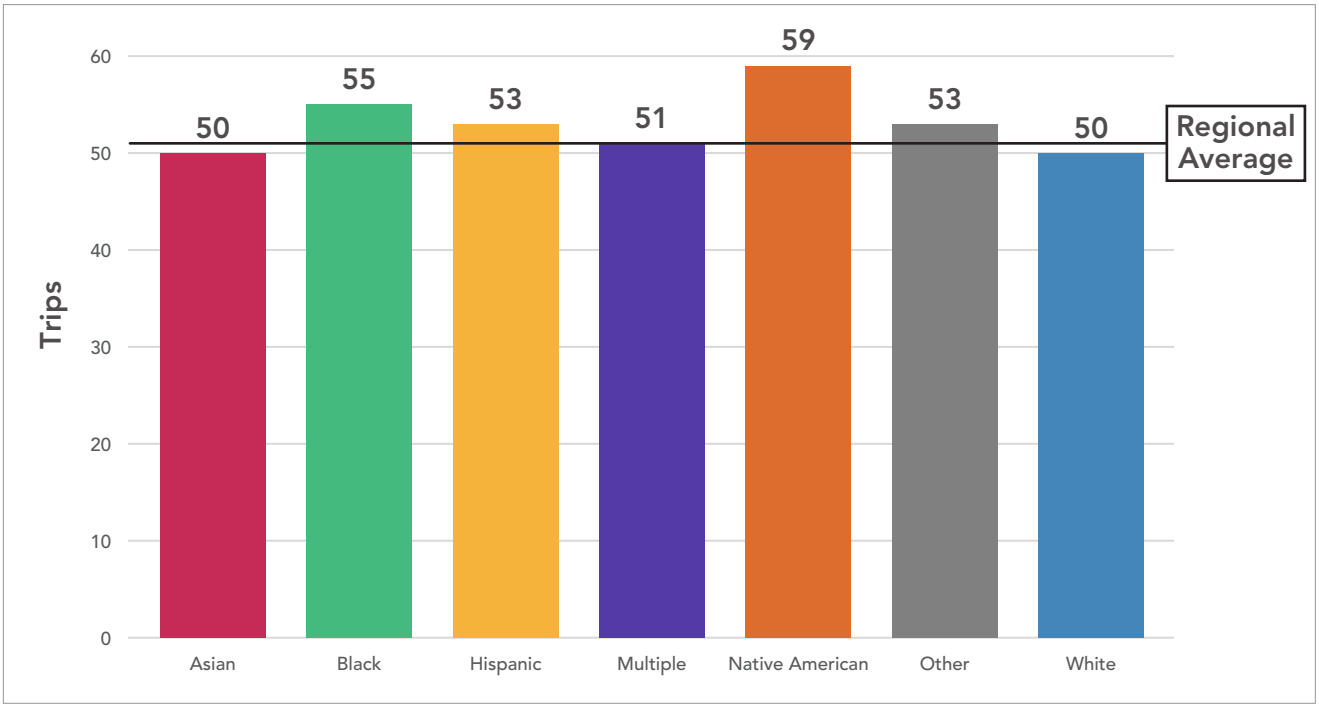


Figure 12. Average Number of Trips Available to the Population, Disaggregated by Race, Fall 2022

As shown in Figure 12, in 2022 Native American, Black, and Hispanic residents had more trips available at a nearby stop, on average, compared to White non-Hispanic residents. There was no difference between trips available to Asian and White non-Hispanic residents. The region remains highly segregated, and there is often a high demand for service in areas serving Black and Native American residents. The count of scheduled trips helps describe who could potentially benefit from transit service, but it does not account for the utility of the service to communities.

Service Utility

Access to Frequent Service

A transit route that serves stops at least four times per hour, on average, weekdays and Saturdays is considered frequent service (i.e., "high frequency"). Frequent service supports flexible and easy travel. When service becomes very frequent, customers do not need to carefully plan around a transit schedule, the service is more useful, and it becomes more likely that service can replace single-occupancy auto trips. One way to quantify service utility is to measure the proportion of the population that can reasonably walk or roll to frequent service.

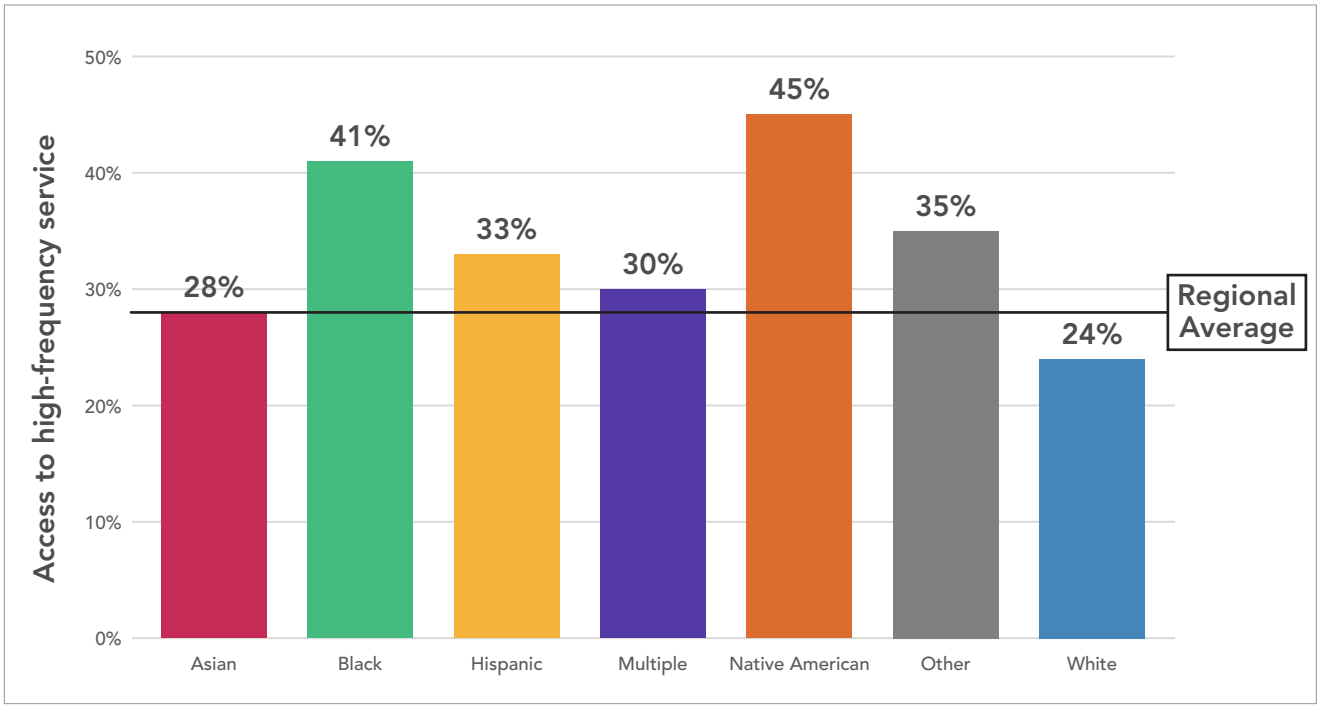


Figure 13. Percent of Population with Access to High-Frequency Service, Disaggregated by Race, Fall 2022

As shown in Figure 13, Native American and Black residents were most likely in 2022 to have access to high frequency service nearby. High-frequency service through racially segregated areas leads to significant differences in access to frequent service among racial groups. All disaggregated BIPOC populations on average have greater access to high-frequency service compared to White non-Hispanic residents.

Job Accessibility

Job accessibility measures how many jobs can be reached within a reasonable travel time. It is an important measure of the utility of transit. Transit is designed to connect community with opportunity—whether that is a job, education, health care, or social connections. Job density is often a proxy for activity and community resources. Therefore, job accessibility is one way to understand residents' opportunities to connect to important destinations in the region.



Figure 14. Weekday-Midday Access to Jobs for Metro Transit Service Area, Fall 2022

Jobs are concentrated in the downtowns of Minneapolis and St. Paul. The downtowns are also historically the focal points of the transit network, where many transitways and local and commuter services converge. These combined factors result in significant differences in job accessibility via transit across the region. In this analysis, a job is considered accessible if it can be reached by transit within 45 minutes. Figure 14 illustrates that living near the downtowns and within walking distance of high-frequency service provided the most access to jobs in 2022, a proxy for the residents' opportunities to connect to important destinations in the region. As shown in Figure 15, more jobs in 2022 were accessible by transit, on average, to BIPOC residents compared to White non-Hispanic residents.

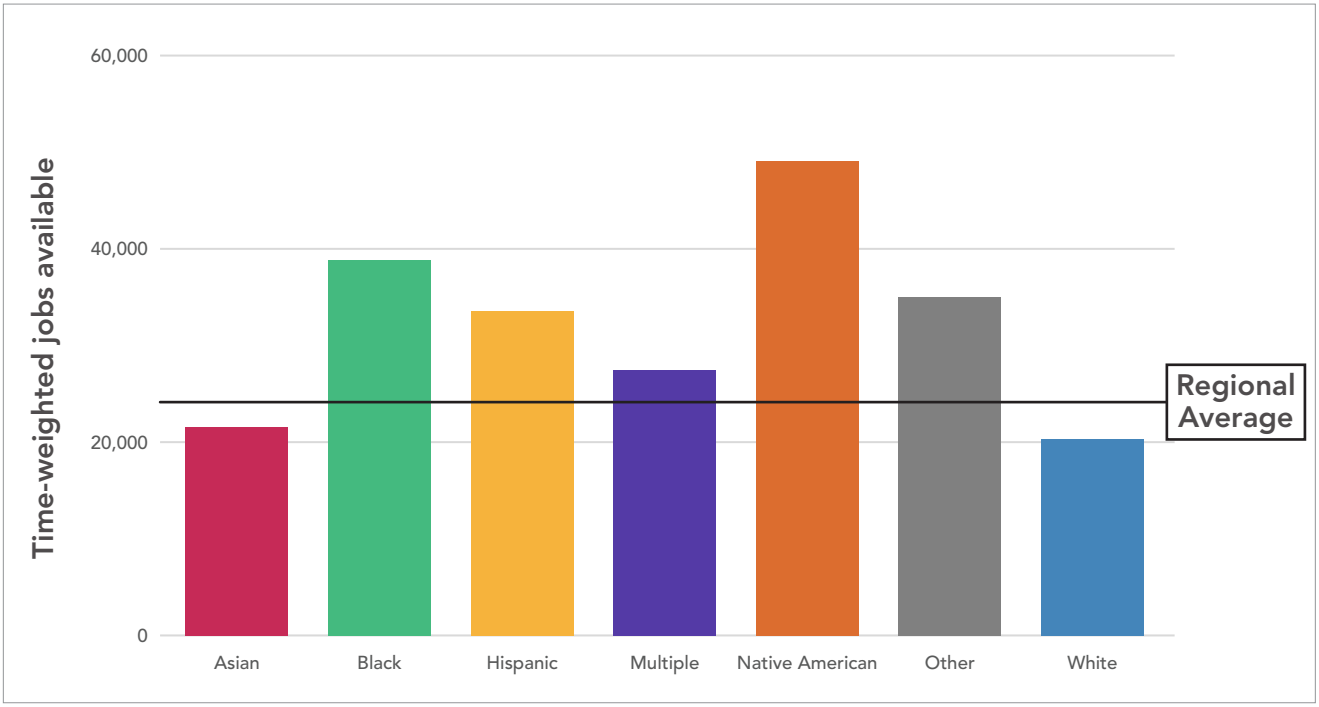


Figure 15. Weekday-Midday Access to Jobs by Race/Ethnicity for Fall 2022

Service Reliability

Several metrics are used to understand the transit system's reliability: on-time performance, cut trips, and the percent of scheduled service delivered.

On-Time Performance

On-time performance is the percent of buses and trains that depart a stop on-time according to the transit schedule (a threshold of up to five minutes late or one minute early); it is a common approach to estimating service reliability.

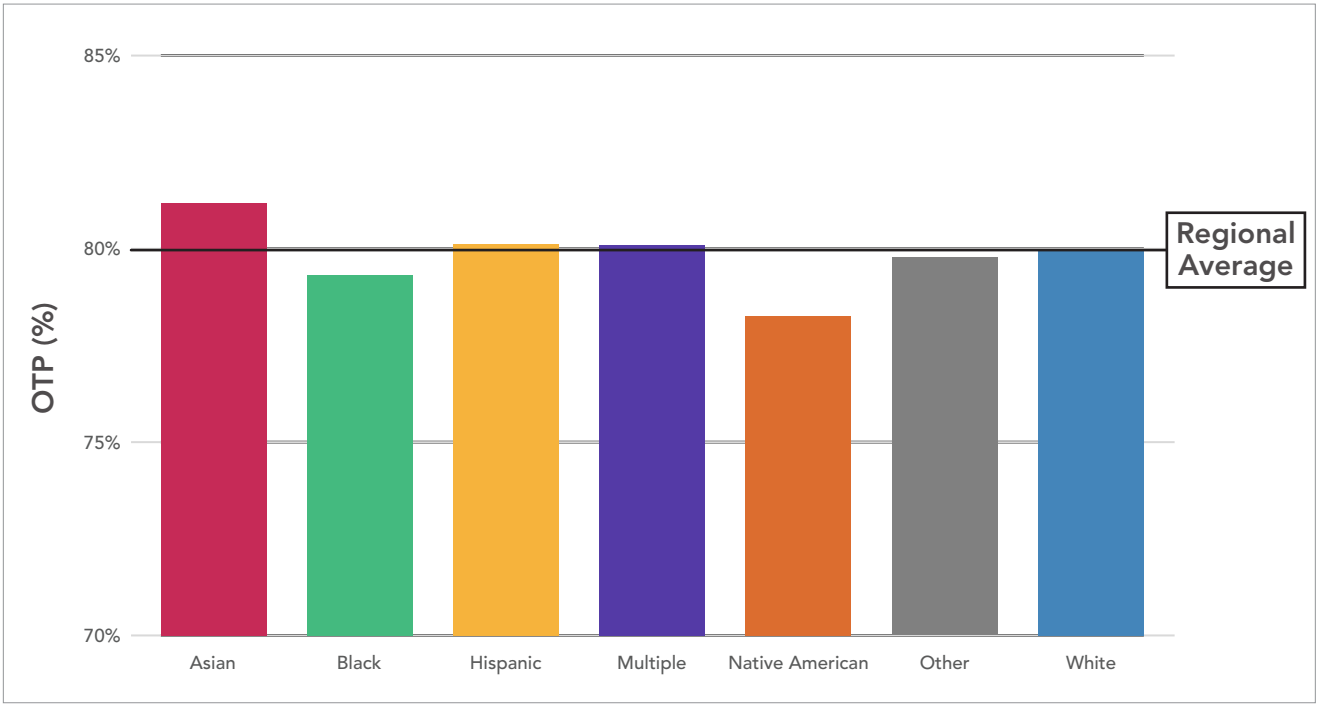


Figure 16. On-Time Performance of Bus and Rail Service Near Residents, Disaggregated by Race, Fall 2022

Similar to previous years, transit service in 2022 was less reliable (i.e., less likely to be on-time) for Native American and Black populations because these population groups were more likely to live near stops that have less reliable service (Figure 16).

Cut Trips and Percent Service Delivered

A cut trip represents the most severe form of unreliability and has a greater impact on customers than a late bus or train. During Fall 2022, there were more than 50 trips cut, on average, for residents living near transit. Black and Native American residents were more likely to live near stops with cut trips compared to other racial groups (Figure 17) in part because they have the highest levels of service.

When faced with a shortage of drivers on a given day, Metro Transit dispatchers cancel specific trips. In an effort to minimize the impacts, dispatchers prioritize maintaining service where there are few alternatives for impacted riders, whether via alternative routes or alternative trips. In practice, this often results in reducing service on the highest frequency routes where more customer alternatives are scheduled, either on adjacent routes or adjacent trips on a route schedule. Service is preserved on routes with fewer trips and fewer alternative routes, such as low frequency local and express routes where cutting a trip would introduce a gap in service of an hour or more. While well-intended, these guidelines result in most cuts occurring on high-frequency routes. Since high-frequency routes serve a higher proportion of BIPOC communities than other route types, cut trips disproportionately affect communities of color.

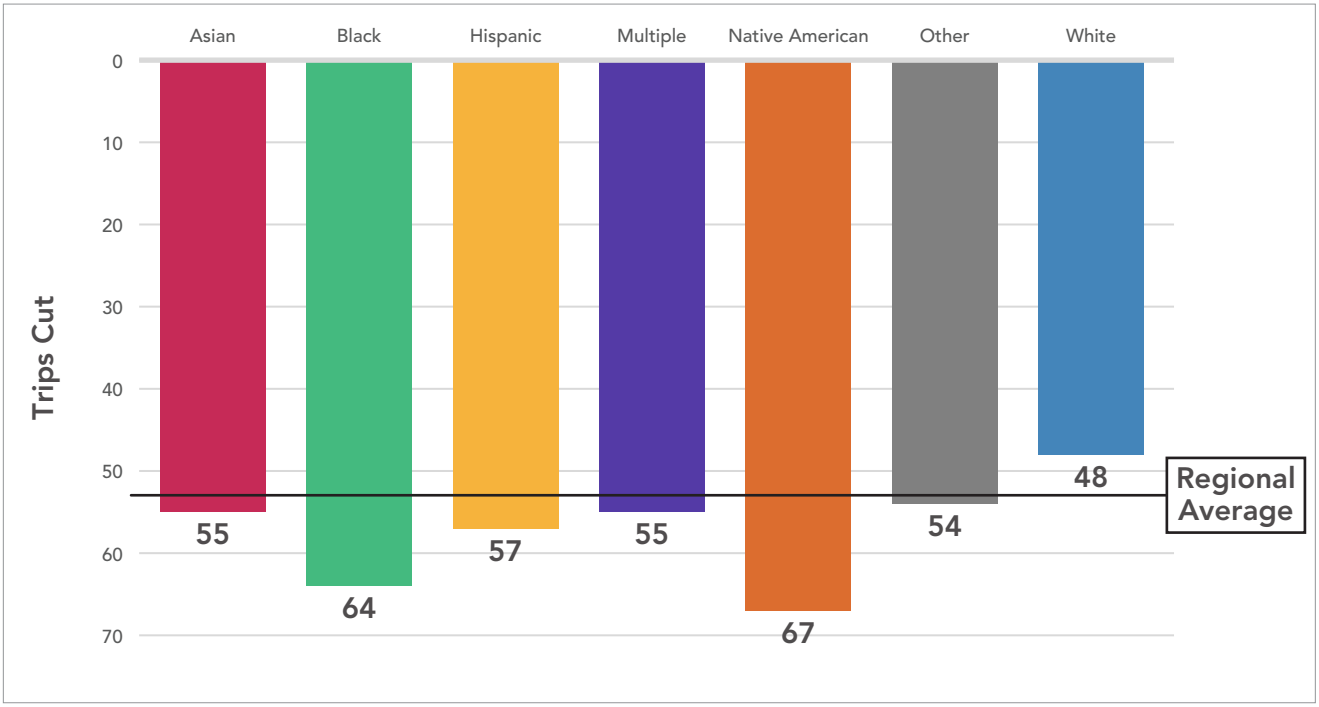


Figure 17. Cut Trip Count, Disaggregated by Race, Fall 2022

Although trips serving Black and Native American residents were more likely to be cut in 2022, the percent of service delivered was generally high in 2022 across all racial/ethnic groups. The differences in percent service delivered among racial/ethnic groups was also relatively small. Compared to 2021, transit service was less likely to be cut in 2022 (Figure 18).

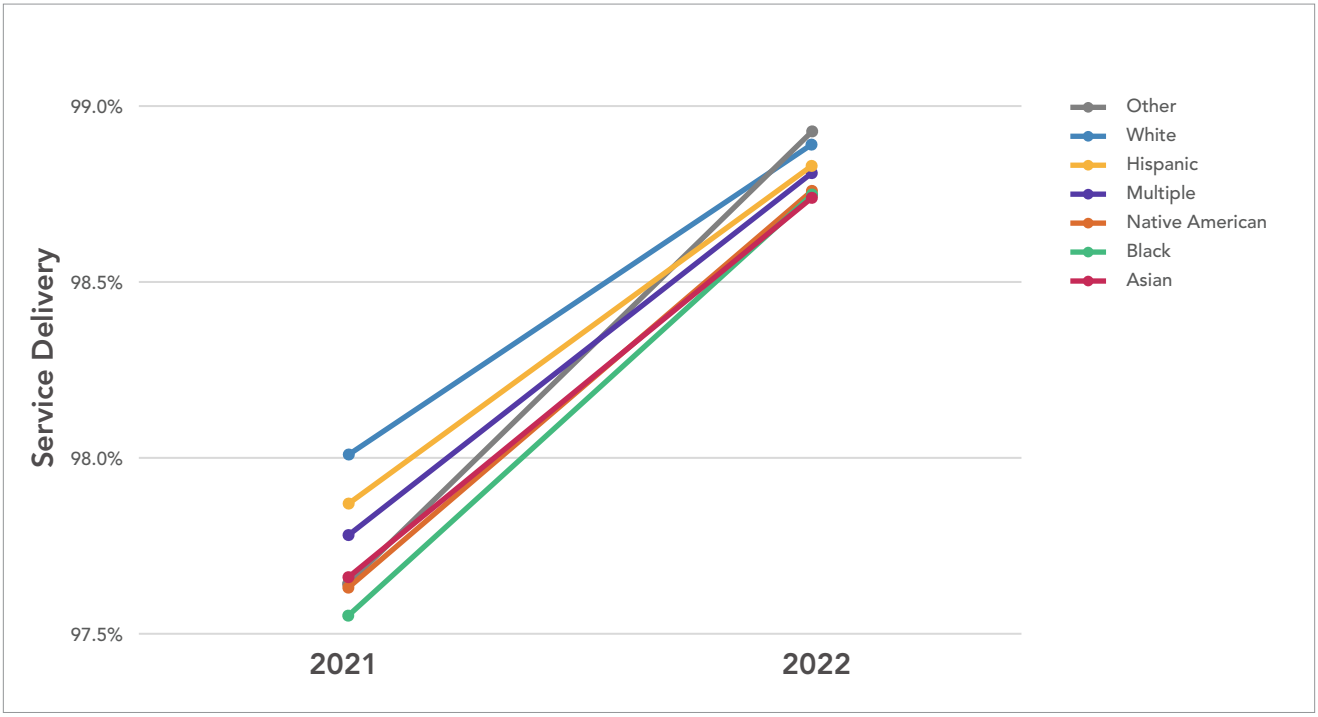


Figure 18. Percent Service Delivery Near Residents, Disaggregated by Race, Fall 2021 and Fall 2022.

Cutting trips is inconvenient for riders, especially if they are already at their stop expecting a bus that will not arrive. For those with time-sensitive travel plans, access to less frequent service, and/or limited travel mode options, making alternative arrangements may be costly, time-consuming, or impossible. Metro Transit staff work to minimize adverse impacts of trip cuts by prioritizing the delivery of certain services such as school trips or routes with fewer alternatives.

Although the percent of cut service is very small and the difference across racial groups is also small, Metro Transit is dedicated to eliminating cut service in every location. In 2021, Metro Transit attempted to right-size schedules to better meet operator availability, but the persistence of the operator shortage required significant service reductions again in 2022 to further mitigate cut trips and reliability impacts. Prior to the pandemic and severe workforce shortages, cut trips were an anomaly and happened so infrequently it was not regularly reported. Metro Transit's goal is for cut trips to be a highly unusual occurrence.

Current Equity Practices in Service Planning

Metro Transit incorporates equity in all aspects of transit service planning, ranging from individual route-level service changes to corridor-level projects and Title VI anti-discrimination work required by the FTA.

Title VI Program

Title VI is just one aspect of Metro Transit's equity work, but it is an important part of complying with federal requirements for transit agencies. The Metropolitan Council has a Title VI Program, which is required by the Federal Transit Administration (FTA) and. must be updated every three years. The Council approved the latest Title VI Program in late 2022, including changes to Disparate Impact and Disproportionate Burden Policy and Service Equity Analysis (SEA) methodology.

Disparate Impact and Disproportionate Burden (DI/BD) Policy

Following FTA guidelines, Metro Transit uses a threshold to determine when differences are significant enough to result in potential discrimination. "Disparate impact" refers to race discrimination, while "disproportionate burden" refers to income discrimination. Prior to 2022, the Council used a threshold of twenty percent to identify whether a proposed fare change, major service change, or triennial monitoring review shows evidence of potential discrimination. In 2022, the Metropolitan Council updated DI/DB policy to redefine disparate impact and disproportionate burden as a difference greater than ten percent. If adverse or beneficial effects of service changes borne by BIPOC or low-income groups are not within ten percent of the effects borne by White or non-low-income groups (respectively), then the changes would pose a potential disparate impact or disproportionate burden. Council policy does not consider a beneficial effect beyond ten percent difference to BIPOC and low-income populations as evidence of potential discrimination. This change was subject to a public comment period, where 17 agencies and individuals provided feedback supportive of the new policy.

Service Equity Analysis (SEA) Methodology Review

In 2021 Metro Transit began an in-depth review of the methodology used to perform a SEA. This work included reviewing how peer transit agencies conduct SEAs, measure transit access and define important concepts such as "poverty", "major service change" and "threshold for disparate impact or disproportionate burden." As a result of this work, Metro Transit has modified the increased the amount used to determine poverty as 185% of the federal poverty level, has started using the street network to determine reasonable walk or roll distance to transit, and is now incorporating actual rider data to supplement U.S. Census data when possible. These changes were formally approved by the Council in 2022 as part of the Title VI Plan update.

Service Monitoring Study

The service monitoring study is one element of the Council's Title VI Program. Every three years most transit agencies must review six performance standards and design guidelines to see how well they meet these standards in communities of color and/or in low-income areas as compared to the rest of the system. Last conducted in 2021, the study showed no concerns with potential for disparate impact or disproportionate burden. The study results were approved by the Metropolitan Council in January 2022, prior to updates to DI/DB Policy in late 2022. The next monitoring study will be completed in 2024.

METRO D Line & Local Service Changes

A Service Equity Analysis (SEA) was done because the D Line and changes to routes in the BRT corridor (39, 133, 721 and 724 south of Brooklyn Center Transit Center) met the agency's definition of a major service change. 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 study showed no potential for disparate impact or disproportionate burden resulting from these proposed changes. The results of the analysis were shared with the Metropolitan Council in August 2022 and approved.

December 2022 Service Changes

An SEA was completed for all service changes proposed for December 2022, which included the opening of D Line as well as service reductions and suspensions affecting dozens of routes. This analysis reviewed Metro Transit's service changes to understand how service availability—or access to transit—may change for residents and the extent to which impacts differ between BIPOC and white non-Hispanic residents, and between low-income and non-low-income residents. The analysis concluded that there was no potential for disparate impact or disproportionate burden.

Routine Practices

Equity is also reflected in Metro Transit's guiding equity principles, ongoing updates of the network improvement plan (in progress), and day-to-day decisions and processes.

Transit Equity Statement

In 2022, Metro Transit adopted a Transit Equity statement, which was drafted by the Equity & Inclusion team and includes feedback from employees throughout Metro Transit. This statement guides the tangible steps Metro Transit is taking to be more equitable and inclusive within the organization and community.

> Metro Transit acknowledges that providing safe, affordable, and reliable transportation increases opportunity. Transit services and programs should be built to equitably benefit all, especially under-served communities, including BIPOC, low-wealth, women, people with disabilities, LGBTQ, youth and older adults. Transit equity requires identifying and addressing injustices and building actionable pathways to create a fair and more just future.
>
> Metro Transit understands that transit decisions can impact the ability of under-served communities to find and keep jobs, reach medical care, access educational opportunities and affordable housing, and develop and maintain social connections, among other impacts. Transit services and investments can reduce spatial inequalities that contribute to racial, environmental, and economic disparities.
>
> Metro Transit has an essential role and responsibility to examine all decisions impacting our region's access to quality transit, reduce existing disparities, and prevent further inequities by:
>
> - Reviewing and revising policies
> - Seeking partnerships with other responsible institutions; and
> - Improving planning and operational practices

Network Now

Network Now is a systemwide project that started in 2022, although the public-facing work didn't happen until early 2023. It establishes Metro Transit's priorities over the next four years. This plan will recognize the changes to the region's transit network that have occurred since 2019, build on the success of regional transitways and BRT networks advanced in Network Next, and guide how Metro Transit will invest in service through 2027. Strategies to promote equity will be woven throughout the Network Now process, in particular, through engagement, data analysis, and service improvement evaluation. One of the Network Now principles introduced in Fall 2023 is directly related to equity and overcoming regional disparities: Prioritize access for those who rely on transit the most, including lower-income groups and communities of color.

Customer Surveys

It is important to ensure that feedback is collected from a representative cross-section of the public so that the needs of traditionally under-represented populations are heard. When doing survey work, responses are analyzed to make sure that there is fair representation from the demographic groups most likely to ride transit. If it appears that a group is under-represented, staff makes extra effort to "meet our riders where they are."

The Travel Behavior Inventory project was updated in 2022. This on-board survey provides important data at the route level about how, when, where, and why people travel on the region's

buses and trains. The survey also shows who takes transit to make sure the transit system works in an equitable way for everyone who uses it. More information is available on the Met Council website at metrocouncil.org/Transportation/Performance/Travel-Behavior-Inventory/Transit-On-Board-Survey.aspx.

Prioritizing Speed and Reliability Improvements

Metro Transit's Speed and Reliability projects are designed to make transit faster and more reliable, which are key factors to attracting customers. Projects may include transit advantages (bus-only lanes, traffic signal priority that extends a green light at key locations) and other strategies such as combining bus stops, improving stop facilities, and simplifying routes to make transit more attractive. Along with other evaluation factors, priority is given to improvements that serve areas with high percentages of BIPOC residents, low-income residents, and renters, as well as larger numbers of low wage jobs. A related initiative is known as "Better Bus Routes", and two of these projects were worked on in 2022, on routes 17 and 22. More information is available on the Metro Transit website at metrotransit.org/speed-reliability.

Appendix

Methodology for Disaggregating Performance by Race

To determine community racial demographics, Metro Transit estimates the population that can access a transit stop by walking to it within 10 minutes (the 'walk-shed'). Next, the walk-shed is compared to the U.S. Census block-group geographies. The analysis scales the population of each race in each census block-group by the area of the block-group within the walk-shed. For example, if half of a block-group A is in a walkshed and block-group A contains 40 White residents and 60 Black residents, then block-group A contributes half of those residents to the walk-shed, or 20 White residents and 30 Black residents. All contributions of each Census block-group within the walk-shed are combined to get the total number of residents of each race who are within walking distance of the transit stop.

Performance data is assigned at the transit stop. For example, the on-time performance of a stop is calculated by summing the total number of 'on-time' vehicles departing that stop over the total number of vehicles departing that stop. The performance at that stop is associated with the community living near that stop. This calculates 'population-weighted' performance. If there are many people living near a stop that has 80% on-time performance, it has more impact on the community and the performance than if only a few people live near a stop with 90% on-time performance.

Metro Transit

INTERNAL MEMO

Date: 12/3/2024

To: Ryan O'Connor, Regional Administrator

From: Lesley Kandaras, General Manager
Adam Harrington, Director-Service Development

RE: 2023 Service Equity Analysis

Since 2020, Metro Transit has committed to completing an annual Title VI Service Equity Analysis (SEA) to improve transparency of service-related decisions. The annual Title VI SEA is retrospective and cumulative, reviewing service changes over a 12-month period to understand the potential for disparate impact to BIPOC populations and/or disproportionate burden to low-income populations.

In past years, Metro Transit presented annual SEA findings to the full Metropolitan Council for approval. Recent guidance from the Federal Transit Administration (FTA) permits the agency to henceforth seek approval from executive leadership. This memorandum, which serves as a letter of acknowledgment, summarizes relevant FTA Title VI requirements and 2023 SEA results. **Metro Transit requests your approval of the 2023 SEA findings of no disparate impact (DI) or disproportionate burden (DB) as a result of 2023 service changes.**

FTA Circular 4702.1B and Council Policies

Title VI compliance typically requires an SEA for each major service change; due to the large volume of service changes since the COVID-19 pandemic, Metro Transit completes an annual SEA to reflect cumulative effects of all service changes occurring in a calendar year. Council Policy 6.1 defines a Major Service Change, and Policy 6.2 outlines the Council's Disparate Impact and Disproportionate Burden (DI/DB) Policy threshold.

SEA Results

Detailed 2023 SEA methodology and results are available (see attached memorandum). This method measures access from residential/home census tract, not accounting for locations served outside those census tracts on transit routes or connecting network. **Between December 2022 and December 2023, Metro Transit increased service overall, benefitting BIPOC, white, low-income, and non-low-income residents.** These service increases were distributed across the service area, affecting urban and suburban routes. Adverse/beneficial effects of service changes were measured as negative/positive net changes in service availability near residents, calculated as the percent change in trips available and the absolute change in trips available. The difference between percent change in service availability suggests the potential for DI/DB, but absolute change does not suggest DI/DB.

Additional background and evidence explain this discrepancy:

- **Equity principles applied in 2020-2022 service reductions protected routes providing critical service to BIPOC and low-income communities.** In many cases, these routes were Urban Local routes and/or frequent routes serving many trips daily, where a small change in percent of trips represents a large volume of service. Conversely, white and non-low-income residents were more likely to live near infrequent or suspended service, where any amount of added service is a large percent change.
- **In 2023, service availability exceeded 2019 levels for BIPOC and low-income residents, but it remained below 2019 levels for white and non-low-income residents.** Many routes remained suspended or reduced in 2023, primarily several dozen Commuter Express routes and some low-frequency Suburban Local routes that typically serve areas with more white and non-low-income residents.
- **Between 2022 and 2023, BIPOC and low-income residents gained more absolute service availability but had lower percent increases compared to white and non-low-income residents.** In 2023, most service changes focused on restoring service on routes that were reduced in 2020-2022, dramatically improving several low-frequency suburban routes with the addition of a relatively limited volume of trips.
- **2023 improvements to service in more white and non-low-income suburban communities likely benefited BIPOC and low-income residents who ride transit disproportionately more than white and non-low-income residents.** Although the highest percent increase in service tended to occur in suburban areas with smaller shares of BIPOC and low-income residents, the most improved suburban routes tended to have majority-BIPOC and majority-low-income ridership.

Therefore, based on the SEA results, wider service change context, and additional analysis, **Metro Transit's conclusion is that 2023 service changes did not result in potential DI/DB.**

Next Steps

Metro Transit requests your approval of the 2023 SEA findings of no disparate impact or disproportionate burden as a result of cumulative service changes in 2023. The 2023 Service Equity Analysis report and acknowledgment letter will be included in the upcoming Title VI Plan update, which the Council will submit to the FTA in 2025.

Acknowledgement and Signatures

The initials and signatures of the following parties acknowledge that they have reviewed this memo and approve it for use in the upcoming Title VI plan update being submitted to the FTA in 2025.

Printed Name: Adam Harrington
Director, Service Development
Signature: Adam E Harrington
Date: 02/26/2025

Printed Name: Lesley Kandaras
General Manager, Metro Transit
Signature: Lesley Kandaras
Lesley Kandaras (Feb 26, 2025 16:03 CST)
Date: 02/26/2025

Printed Name: Ryan O'Connor
Regional Administrator, Metropolitan Council
Signature: Ryan T. O'C
Date: 02/26/2025

Date: May 28, 2024

To: Cyndi Harper, Metro Transit

Victoria Dan, Metro Transit

From: SRF Consulting Group, Inc.

RE: Title VI Service Equity Analysis – December 2023

Introduction

This memo summarizes an analysis of Metro Transit's service changes from December 2022 to December 2023 to understand how service availability – or access to transit – may have changed for residents and the extent to which impacts differ between Black, Indigenous, and people of color (BIPOC) and white non-Hispanic residents, and between low-income and non-low-income residents. While this type of annual review is not required by the Federal Transit Administration (FTA)'s Title VI guidance, methods for evaluating major service changes defined in Metro Transit's Title VI Policy were used in this evaluation. Metro Transit's Title VI Policy has a threshold of 90 percent:

- Disparate impact occurs when BIPOC residents experience less than 90 percent of benefits relative to white non-Hispanic residents.
- Disproportionate burden occurs when low-income residents experience less than 90 percent of benefits relative to non-low-income residents.

Between December 2022 and December 2023, Metro Transit increased service overall. These service increases are distributed across the service area including some increases to core urban local routes (such as Route 21) and frequency improvements to some suburban local routes (from 90-minute to 60-minute service for example). This document summarizes the effects of these changes on different demographic groups.

Summary of Findings

This analysis compares transit service levels between December 2022 and December 2023. Results have been tabulated in two ways. The first determines the average percent change in service availability per person and the second determines the average absolute change in number of weekly trips available per person. The percent change method highlights areas where service has been restored and the absolute change method highlights where added resources are more concentrated.

Results of the percent change analysis show that the average resident served by Metro Transit experienced an 11.6 percent increase (66 trips) in the number of weekly scheduled trips available near their home between 2022 and 2023. For BIPOC and low-income populations, the analysis found:

- The average white non-Hispanic resident experienced a 12.6 percent increase in service (69 weekly trips), while the average BIPOC resident experienced a 10.3 percent increase in service (63 weekly trips). Applying the Title VI framework, these results suggest:
    - **A potential for disparate impact on BIPOC residents** on a percentage basis because BIPOC residents experienced just 82 percent of the benefit relative to white residents.
    - **No disparate impact on BIPOC residents** on an absolute basis because BIPOC residents experienced 91 percent of the benefit relative to white residents.
- Similarly, the average non-low-income resident experienced a 12.1 percent increase in service (74 weekly trips), while the average low-income resident experienced a 10.5 percent increase (71 weekly trips). Applying the Title VI framework, these results suggest:
    - **A potential for disproportionate burden on low-income residents** on a percentage basis because low-income residents experienced just 87 percent of the benefit relative to non-low-income residents.
    - **No disproportionate burden on low-income residents** on an absolute basis because low-income residents experienced 96 percent of the benefit relative to non-low-income residents.

The bulk of the service changes between 2022 and 2023 were partial restorations of service reduced during the COVID-19 pandemic. This is important context for the findings of disparate impact and disproportionate burden, as the cumulative change from pre-pandemic conditions has been more favorable to BIPOC and low-income residents. Compared to 2019, the analysis found that in 2023:

- The average white non-Hispanic resident had 15.1 percent less service, while the average BIPOC resident had 0.1 percent *more* transit service.
- The average non-low-income resident had 13.1 percent less service, while the average low-income resident had 0.2 percent *more* service.

Methodology

The methodology section describes how each group of impacted residents is defined, how the service change calculation is made, and the definitions of disparate impact and disproportionate burden per Metro Transit's Title VI Policy.

Impacted Residents

This analysis was conducted as defined in Metro Transit's Title VI Policy. Metro Transit defines low-income residents as those in households earning less than 185 percent of the federal poverty threshold. Additionally, Metro Transit defines residents within its service area as living:

1. Within ¼ mile or a 5-minute walk from regular route bus stops, or
2. Within ½ mile or a 10-minute walk from transitway stops (these include light rail, commuter rail, and bus rapid transit stops)

This analysis used network distances (or walksheds) to determine residents of the service area. Residents in Census blocks with centroids within the predefined time thresholds from stops were counted. This analysis was conducted in the R programming environment using American Community Survey (ACS) 5-

Year Estimates for the years 2018 through 2022. ACS data include demographics data required for this analysis (race and income categories) which are not included in block-level Census data. Because ACS data are only available to the block group level, areal interpolation was used to estimate block-level demographics.

Service Change Calculation

The number of transit trips serving each Census block were counted for weeks containing the following dates:

- 2022: December 3, 2022
- 2023: December 13, 2023

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 the blocks in the service change area, and dividing that sum by the total BIPOC population for the blocks in the service change area. The formula used for these analyses is shown below:

$$Avg\ \%\ \Delta = \frac{\sum(Population_i \times Percent\ Change_i)}{\sum Population_i}$$

Where:

$Population_i$ = Target population of Census block i.

$Percent\ Change_i$ = Percent change in service levels for Census block i.

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

The calculation for average absolute change in trips is consistent with the average percent change. The key difference is that instead of percent change in a Census block, the absolute number of weekly trips was used.

Definition of Disparate Impact and Disproportionate Burden

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. In 2022, Metro Transit updated its disparate impact and disproportionate burden policies and thresholds from the "80 percent rule" to a threshold of 90 percent which states that there may be evidence of disparate impact if:

- *Benefits* are being provided to BIPOC populations at a rate less than 90 percent of the benefits being provided to non-BIPOC populations, or
- *Adverse effects* are being borne by non-BIPOC populations at a rate less than 90 percent of the adverse effects being borne by BIPOC populations.

The same framework is used when evaluating whether low-income populations have experienced disproportionate burden relative to the impacts on non-low-income populations. Metro Transit's decision to use the 90 percent rule for its disparate impact and disproportionate burden thresholds was subject to a formal public outreach process before being adopted by the Metropolitan Council.

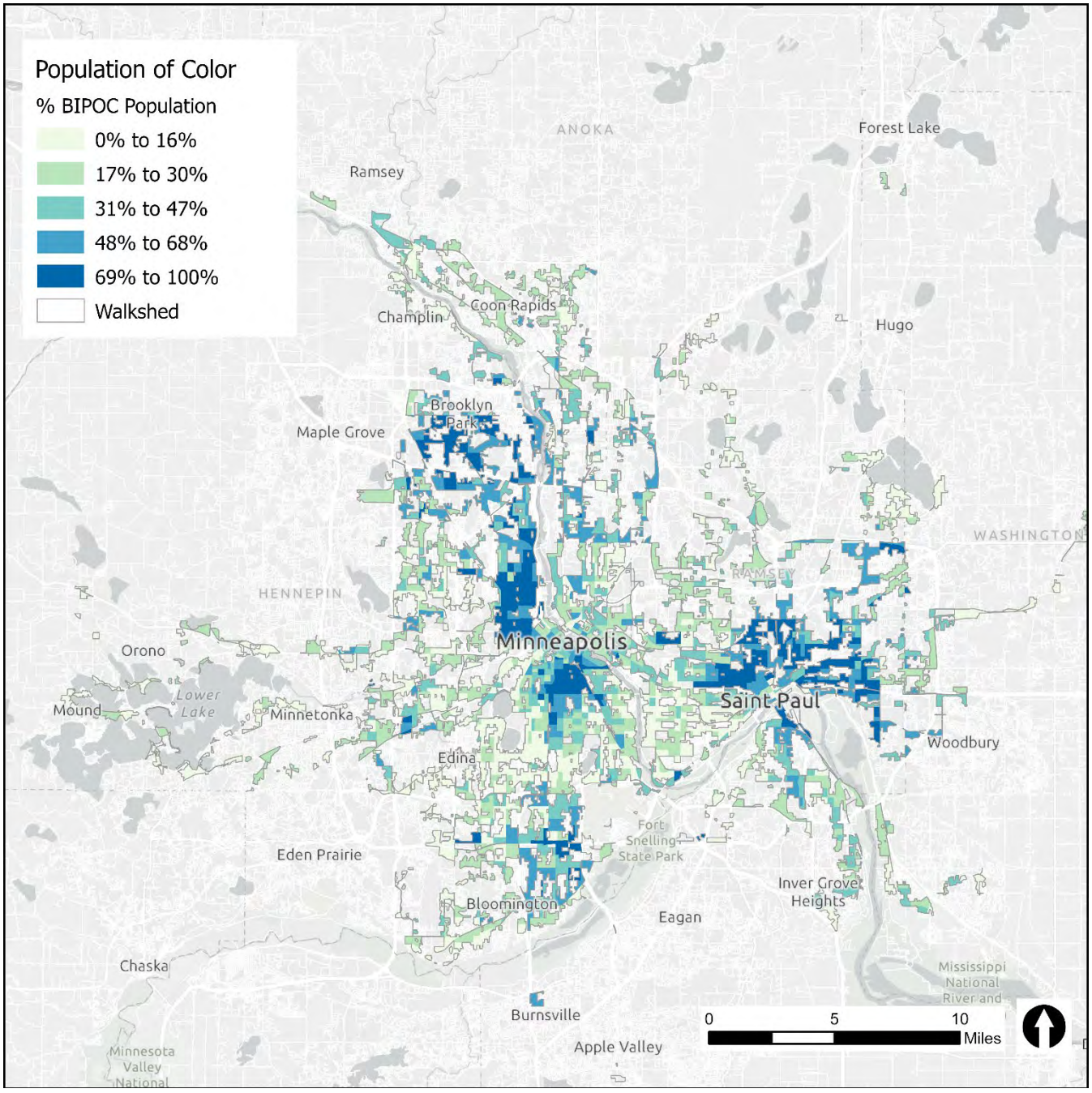
Results

The results section describes how demographic groups are distributed in the service area, as context for the following discussion of results. It then describes service change impacts by demographic group, both as a percentage change and as an absolute number of weekly trips. Maps of service changes by Census block are provided as supporting information.

Impacted Groups

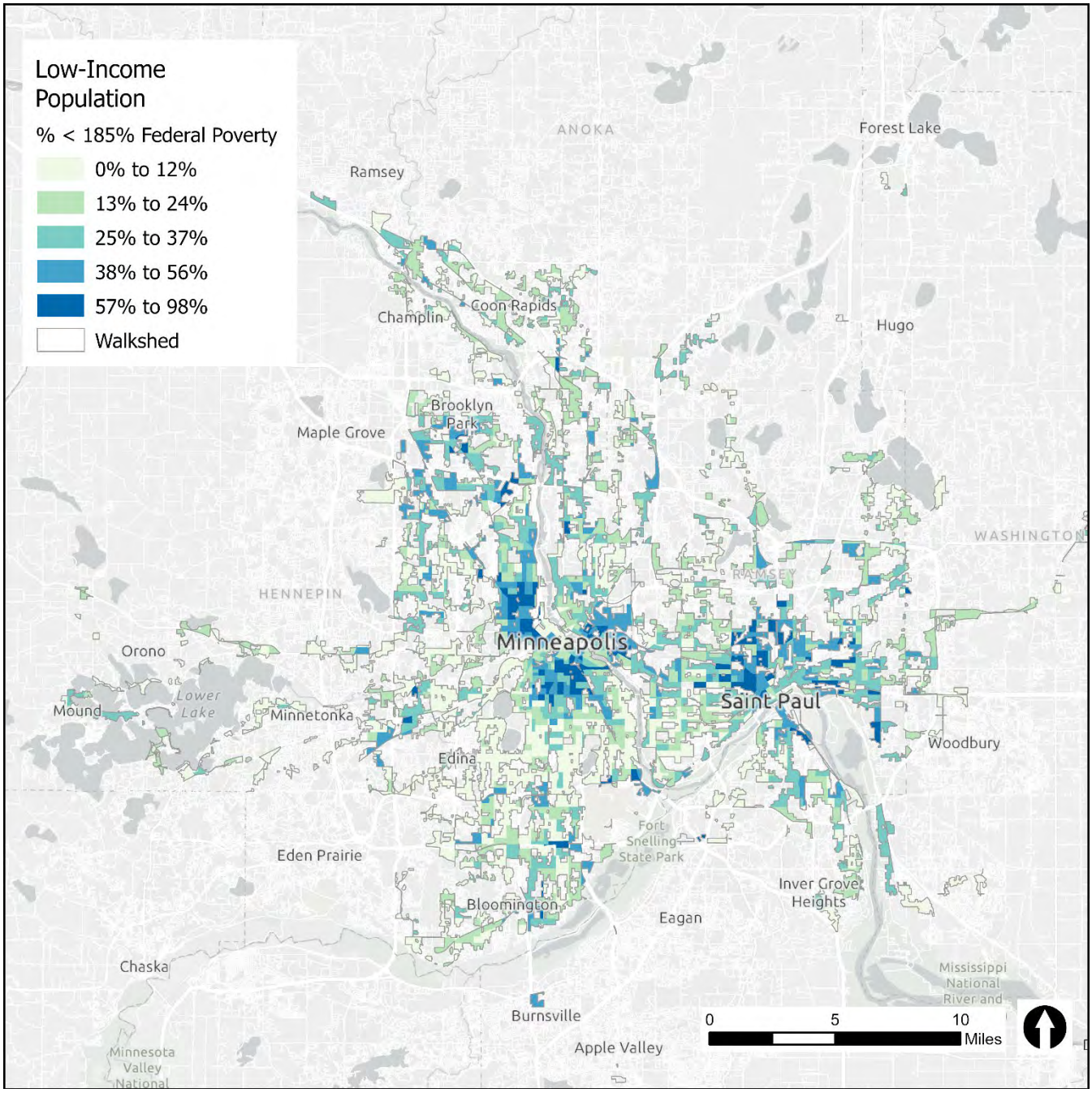
Figure 1 and Figure 2, respectively, show the distribution of BIPOC and white residents and low-income and non-low-income residents, by Census block, within the area served by all network fixed routes. The service equity analysis applies to these residents for both comparisons.

Figure 1. Residents served by Metro Transit fixed routes: BIPOC populations



Source: 2018-2022 American Community Survey 5-Year Estimates, Table C16001. Areally interpolated to Census blocks.

Figure 2. Residents served by Metro Transit fixed routes: low-income populations



Source: 2018-2022 American Community Survey 5-Year Estimates, Table C16001. Areally interpolated to Census blocks.

December 2022 to December 2023 One-Year Percentage Change

The average person living in the area served by fixed routes – regardless of race, ethnicity, or low-income status – experienced an 11.6 percent increase in transit service when comparing December 2022 to December 2023 service levels. During this time, the average BIPOC resident experienced a 10.3 percent increase in available service, while the average white resident experienced an increase of 12.6 percent (Table 1 and Figure 3). The service increase for the average BIPOC resident was 82 percent of the increase for the average white resident. Because BIPOC residents benefited at a rate less than 90 percent of the

benefit to non-BIPOC residents, this analysis identifies **a potential for disparate impact on BIPOC residents** as a result of the overall changes in service in 2023.

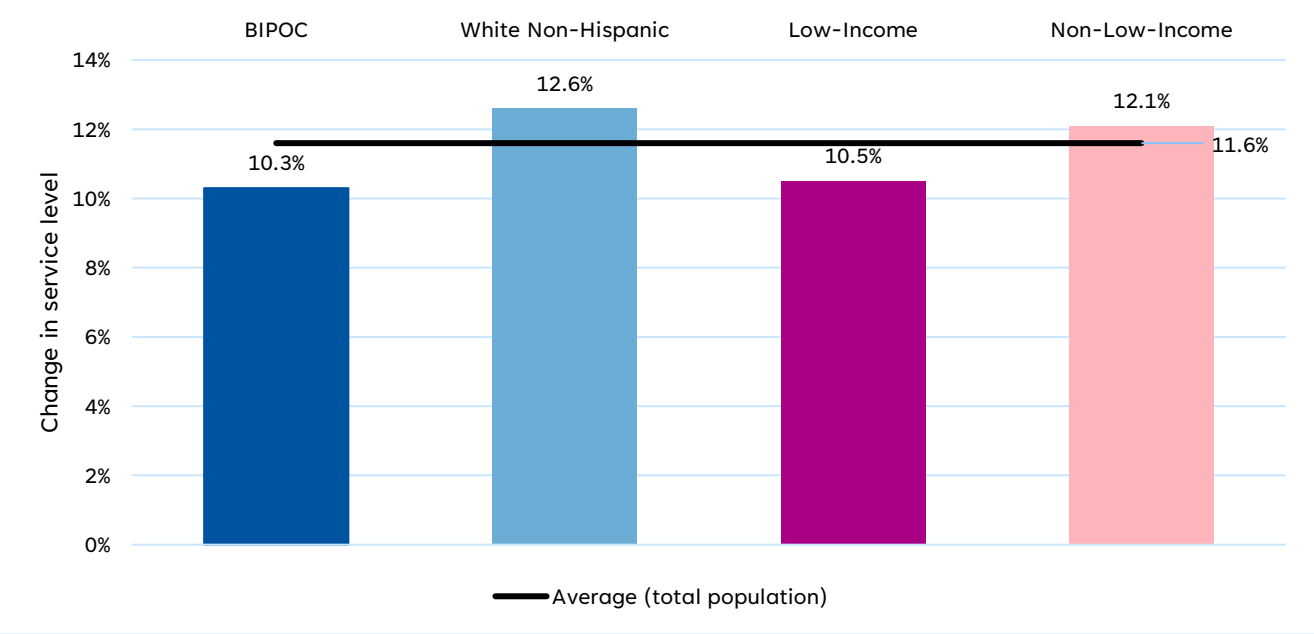
The average low-income resident in the area served by fixed routes experienced a 10.5 percent increase in transit service during 2023, while the average non-low-income resident experienced a 12.1 percent increase (Table 1). Because these benefits were experienced by low-income residents at a rate lower than 90 percent of the benefits experienced by non-low-income residents, this analysis identifies **a potential for disproportionate burden on low-income residents** as a result of the overall change in service from December 2022 to 2023.

Table 1. Average percent change in service: December 2022 to December 2023 service changes

Population group	Average percent change in service
Communities of color	+10.3%
White non-Hispanic	+12.6%
Disparate impact comparison index	0.82 < 0.90, thus, disparate impact
Low-income	+10.5%
Non-low-income	+12.1%
Disproportionate burden comparison index	0.86 < 0.90, thus, disproportionate burden
Total population	+11.6%

Source: SRF analysis of Metro Transit and Census data.

Figure 3: Average percent change in service: December 2022 to December 2023 service changes

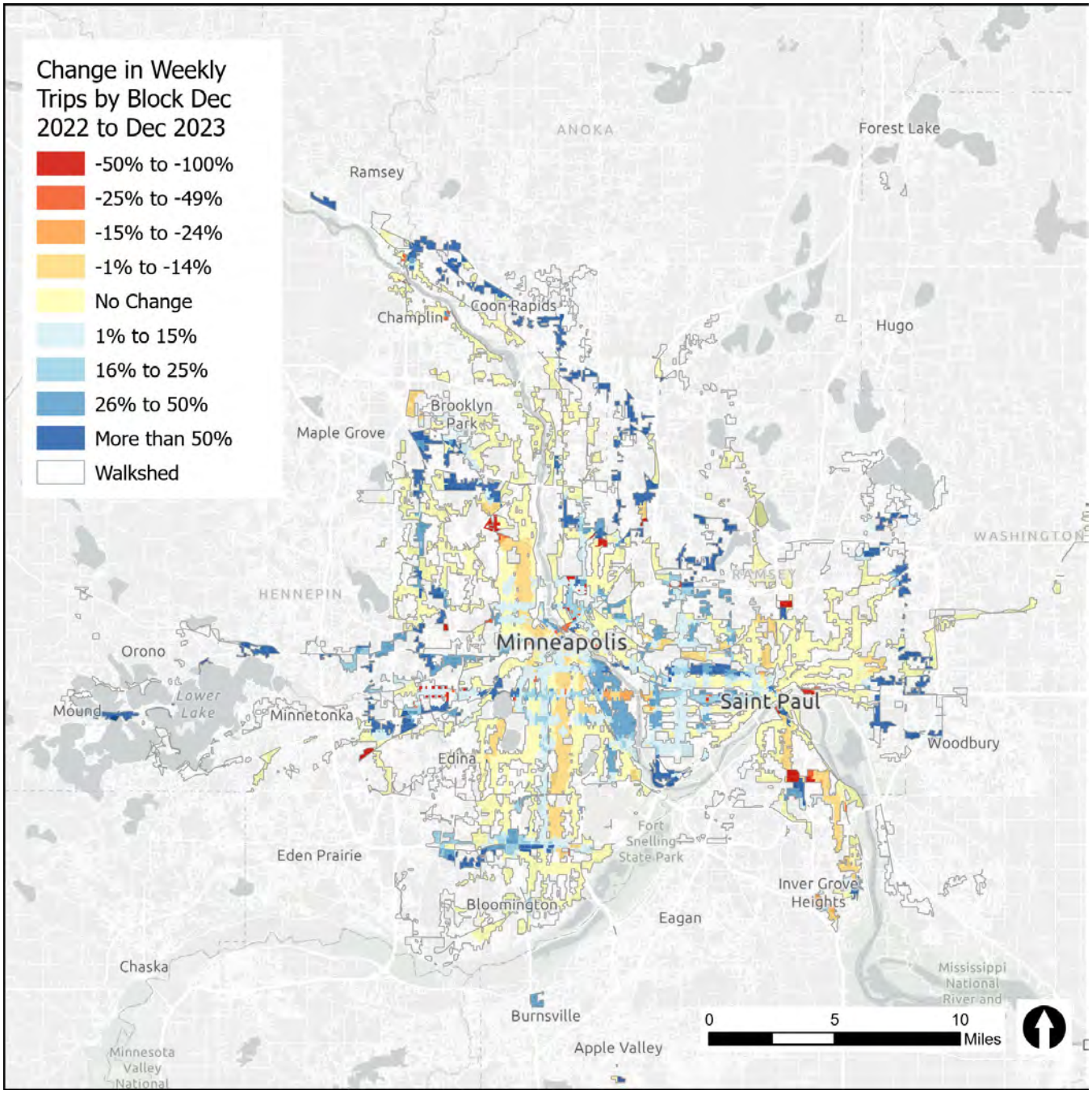


Source: SRF analysis of Metro Transit and Census data.

The percent change in service level from December 2022 to December 2023, by Census block, is shown in Figure 4. As the map indicates, the blocks with the largest percent increases in service tend to be in suburban areas, which have a lower proportion of low-income populations and people of color (see Figure 1 and Figure 2).

The blocks with the largest percent decreases in service tend to be locations where minor or temporary changes were made. These include construction detours in Robbinsdale, Saint Paul, and Saint Anthony; bus stop consolidation such as on Route 17 in Saint Louis Park; and minor routing adjustments, such as relocation of Route 71W terminal and the extension of Route 68 to Marie & Robert Street. Areas with the most significant service reduction are highly concentrated and do not follow full route alignments.

Figure 4. Percent change in service by Census block, December 2022 to December 2023



Source: SRF analysis of Metro Transit and Census data.

December 2022 to December 2023 One-Year Absolute Change

The absolute change in service was calculated using a similar methodology to relative change. However, rather than the average percentage increase or decrease in weekly trips, the change in average number of weekly trips was measured.

Table 2 shows the results of this calculation. The average person living in the area served by fixed routes – regardless of race, ethnicity, or low-income status – had an additional 66.4 weekly trips available when comparing December 2022 to December 2023 service levels. During this time, available weekly trips increased by 63.5 for the average BIPOC resident, 68.5 for the average white resident, 70.9 for the average low-income resident, and 63.8 for the average non-low-income resident.

When absolute change is used as the basis for impact determinations, there is neither a disparate impact nor a disproportionate burden.

Table 2. Average absolute change in service: December 2022 to December 2023 service changes

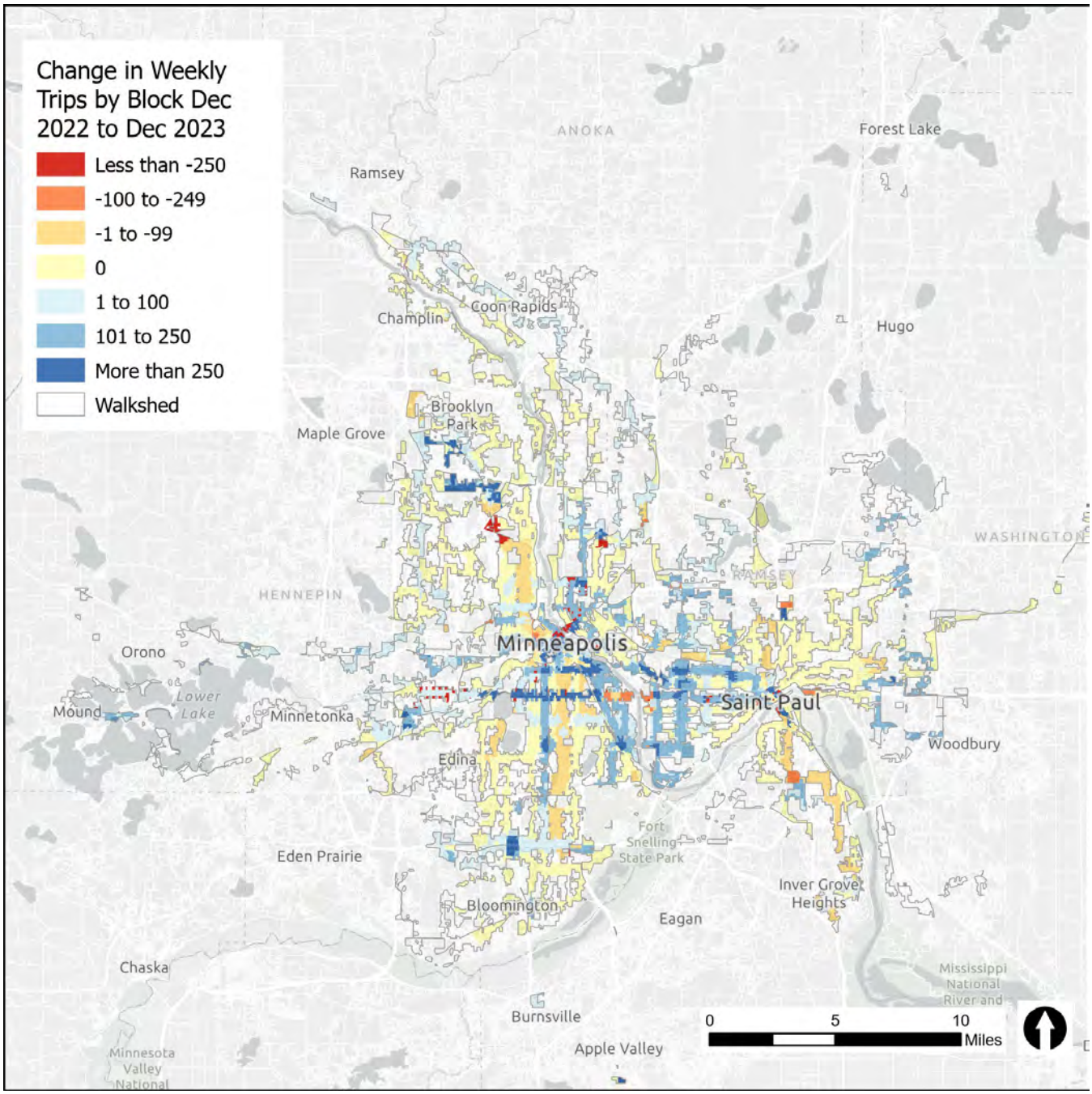
Population group	Average absolute change in service (number of trips)
Communities of color	+63.5
White non-Hispanic	+68.6
Disparate impact comparison index	0.93 > 0.90, thus, no disparate impact
Low-income	+70.9
Non-low-income	+63.8
Disproportionate burden comparison index	1.1 > 0.90, thus, no disproportionate burden
Total population	+66.4

Source: SRF analysis of Metro Transit and Census data.

The distribution of absolute changes in service availability is shown in Figure 5. In contrast to the large percentage increases in suburbs shown in Figure 4, absolute increases tended to be smaller in suburban Census blocks. On an infrequent route, the addition of a small number of additional trips can result in a large percentage increase, while larger absolute increases in service availability in the more densely-served urban core may translate to a relatively small percentage increase. This will be discussed further in the following section.

The largest decreases in trips shown in Figure 5 highlight changes similar to those in Figure 4. Stop consolidation along Route 10 and Route 17, removal of the 3rd Avenue bridge construction detour, and construction detours in Brooklyn Center all appear as significant changes in weekly trips.

Figure 5. Absolute change in service by Census block, December 2022 to December 2023



Source: SRF analysis of Metro Transit and Census data.

Discussion

Service change analysis between 2022 and 2023 yields different outcomes when considered on a percentage versus an absolute basis. The addition of service on an absolute basis was concentrated in a few corridors, with much of that area overlapping with the most concentrated BIPOC or low-income populations. On a percentage basis, the effect of adding trips to infrequent suburban routes resulted in larger percentage increases in areas with smaller BIPOC and low-income populations. That is the chief reason the percentage-based analysis demonstrates a potential for disparate impact and disparate burden, while the absolute basis analysis does not.

This section adds further context to the service change analysis. First, it explores in more detail the riders that may have been affected, using route-level demographic information from the 2022 Travel Behavior Inventory (TBI) Transit Onboard survey. Second, it considers current service levels relative to 2019 service levels, illustrating the continuing impacts of service cuts made during the COVID-19 pandemic.

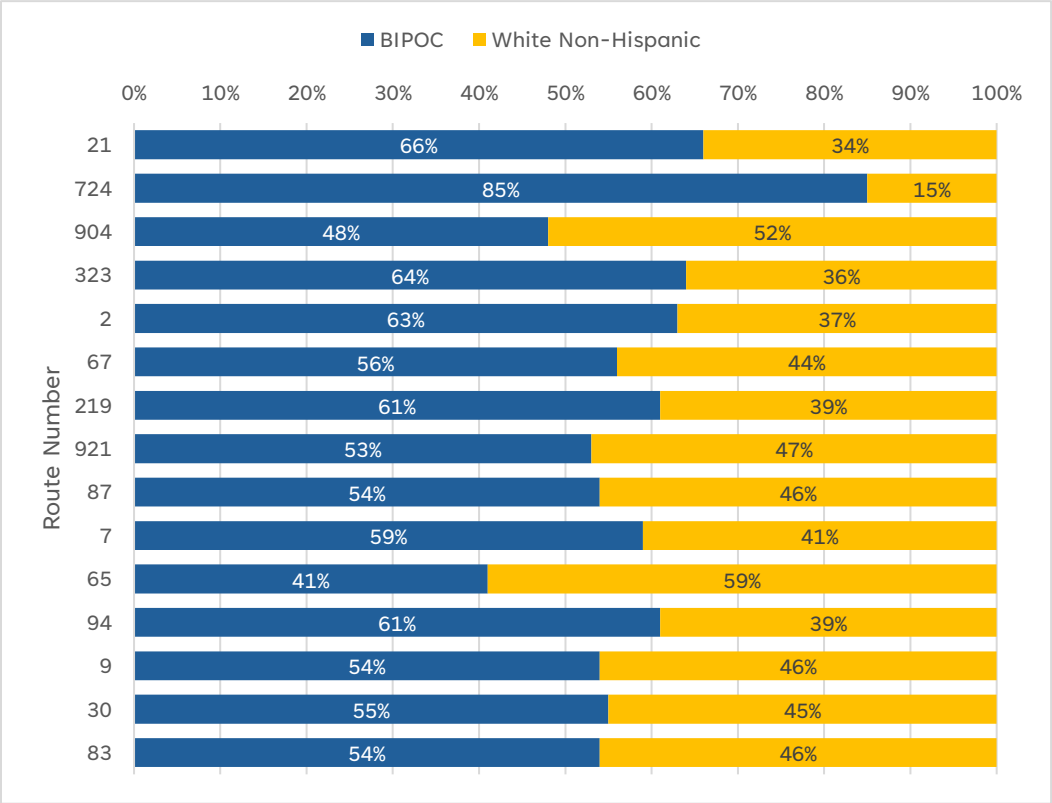
Ridership Demographics

A weakness of the Census-based service equity methodology is that it accounts for the demographics of the population living near stops and stations whether they use transit or not. In contrast to these potential users, the TBI data provides demographic information about current users of each route, who are likely to be more representative of the populations impacted by service changes. As a regional system, Metro Transit connects people to jobs and services well beyond their home census blocks, so that key users of a given route segment may not be those who live near it but those who rely on it for work.

Figure 6 shows the 15 routes that received the largest *absolute* increase in weekly trips between 2022 and 2023, with the route having the largest absolute increase in weekly trips (Route 21) shown first. Subsequent routes are listed in descending order. The share of BIPOC versus white non-Hispanic riders using each route is highlighted. All but two of these routes – the Orange Line (904) and Route 65 – have a majority-BIPOC ridership, according to onboard survey results.[1]

[1] The 2022 onboard survey, while not a census of all riders, was designed to reach a representative sample of ridership. Survey participant selection was randomized and the target sample size was 20 percent of average weekday ridership. Sample sizes for the routes in Figure 6 range from nine percent of average daily riders on Route 2 to 25 percent of average daily riders on Route 805. The average sample size for all routes is 16 percent and the median is 15 percent, with most routes having at least 12 percent of riders sampled. In terms of the absolute number of records, sample sizes range from 9 (out of 50 riders per day) on Route 227, to 804 records (out of 7,100 riders per day) on Route 21. The average number of samples is 132, with a median of 43 samples. Given the wider margin of error with smaller sample sizes, demographic estimates should be treated with caution; however, since survey sampling bias tends to over-represent white and non-low-income participants, the risk of mis-identifying a route as majority BIPOC or majority low-income is low.

Figure 6. Racial demographics of routes with largest absolute increase in weekly trips

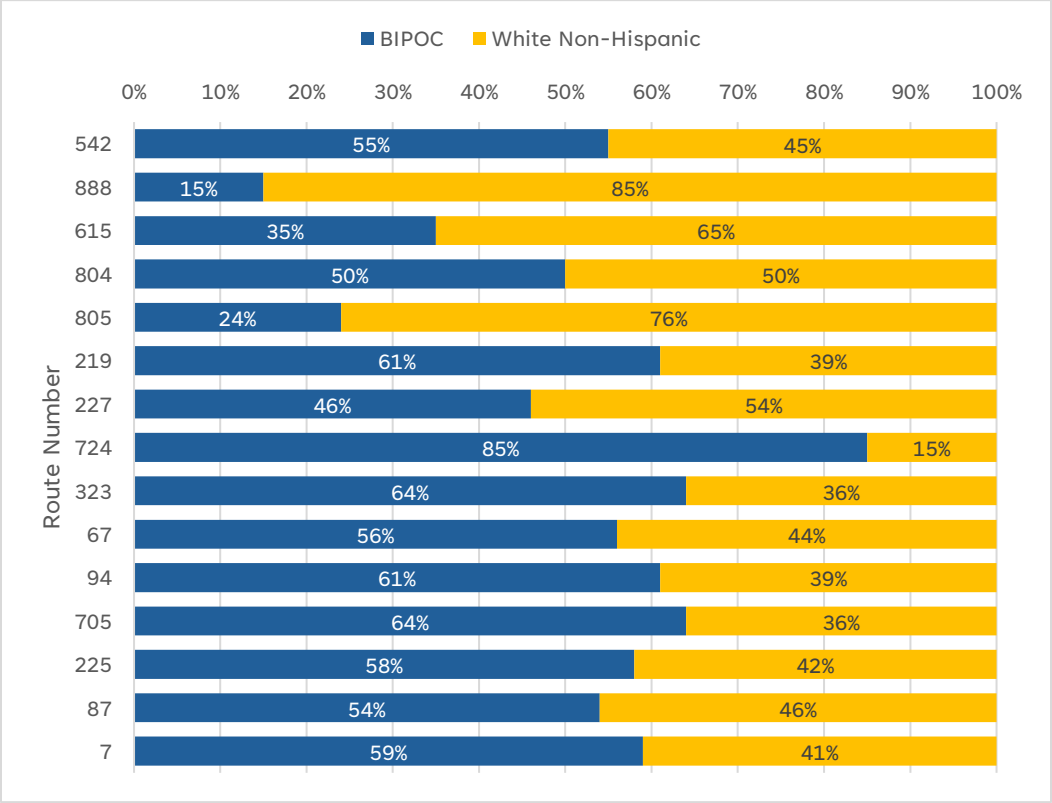


Source: SRF analysis of Metro Transit schedule data and 2022 TBI onboard survey results.

Figure 7 shows the 15 routes with the largest *percentage* increase in weekly trips from 2022 to 2023, again with the route showing the largest percent increase in weekly trips listed first (Route 542). The remaining routes are listed in descending order. The share of BIPOC versus white non-Hispanic riders using each route is highlighted. In contrast to the demographics of the routes with the highest absolute change, some of the routes with the greatest percentage increase were predominantly non-BIPOC. Four routes of the fifteen shown – Northstar (888), Route 615, Route 805, and Route 227 – were at least 51 percent non-BIPOC and represent some of the highest increases in this timeframe. This is consistent with earlier observations about the impacts of adding trips to infrequent routes.

However, the remaining majority-BIPOC routes in Figure 7 also include several infrequent suburban routes that contributed to the larger percentage increases in blocks with larger white populations: Route 542, Route 219, Route 724, Route 323, Route 705, and Route 225. This suggests that some of 2023's service improvements benefited more BIPOC riders than the Census-based methodology suggests.

Figure 7. Racial demographics of routes with largest percentage increase in weekly trips

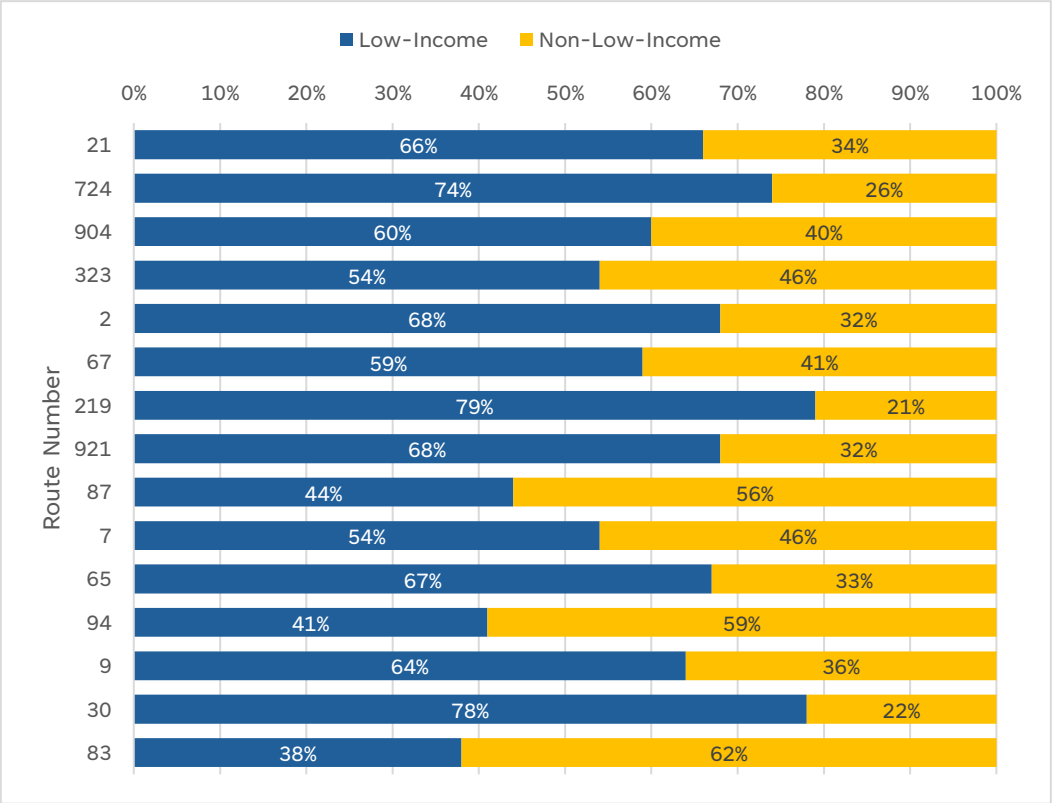


Source: SRF analysis of Metro Transit schedule data and 2022 TBI onboard survey results.

Figure 8 shows the income distributions of the 15 routes that received the largest absolute service increases between 2022 and 2023, in descending order. All but three of these routes – Route 87, Route 94, and Route 83 – have majority low-income ridership. In contrast, the income distribution for routes with the highest percentage service increase, shown in Figure 9, includes five routes with at least 51 percent non-low-income ridership: Northstar (888), Route 542, Route 805, Route 94, and Route 87.

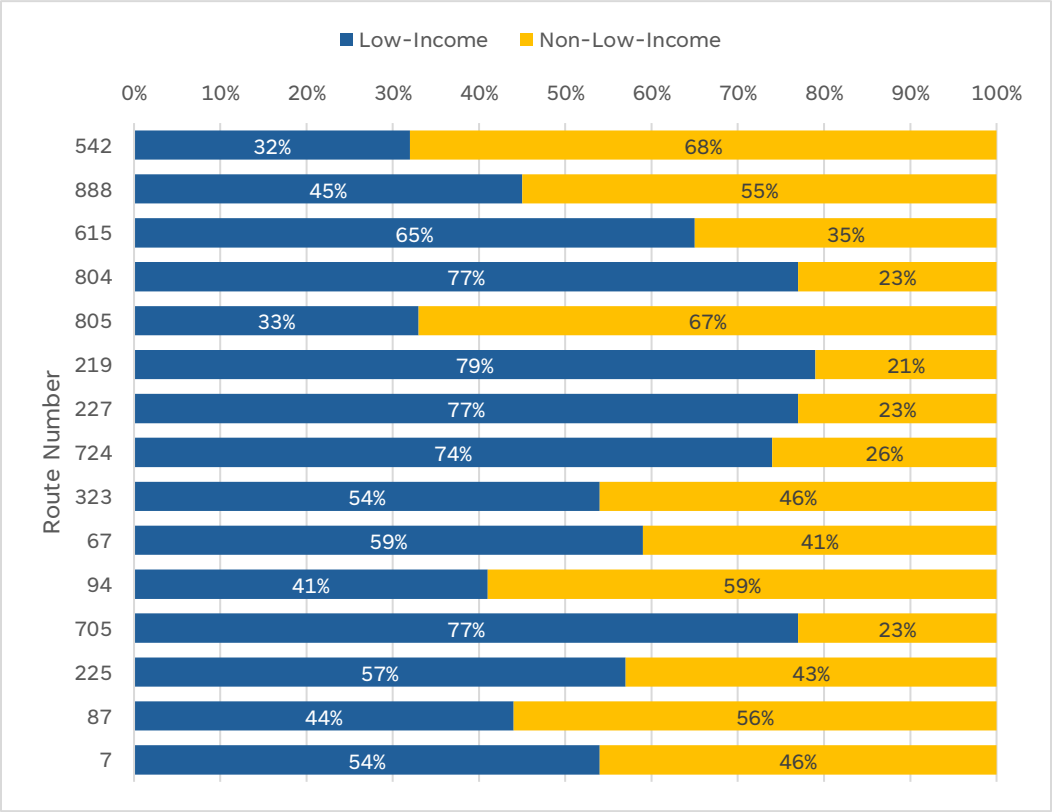
However, as with race, the ridership of the remaining routes suggests that low-income riders also benefited from service increases. Majority low-income suburban routes in the list include Route 615, Route 804, Route 219, Route 227, Route 724, Route 323, Route 705, and Route 225.

Figure 8. Income demographics of routes with largest absolute increase in weekly trips



Source: SRF analysis of Metro Transit schedule data and 2022 TBI onboard survey results.

Figure 9. Income demographics of routes with largest percentage increase in weekly trips



Source: SRF analysis of Metro Transit schedule data and 2022 TBI onboard survey results.

These figures support two observations: First, defining service increase on an absolute basis of total weekly trips added is more reflective of the magnitude of regional service improvements than if service increase is defined on a percentage basis, and will generally show these changes as more equitable than they would appear on a percent change basis. Second, they suggest that the service increases of 2023 served a customer base that was predominantly BIPOC and/or low-income, regardless of the residential demographics near stops and stations.

Impacts of Service Restoration

Also relevant is the four-year history of service changes since the COVID-19 pandemic began in 2020. The pandemic led to steep reductions in public transit ridership and service in 2020, 2021, and 2022. Most of the service changes that occurred in 2023 focused on restoring service that had been reduced due to the pandemic.

Hence, a second analysis compared the service network in September 2019 with the adjusted network in December 2023. The dates used were as follows:

- 2019: September 18, 2019
- 2023: December 13, 2023

This analysis found that the average person living in the area served by fixed routes – regardless of race, ethnicity, or low-income status – had 8.9 percent less transit service in December 2023 than in September

2019. The average white non-Hispanic resident had 15.1 percent less service. However, the average BIPOC resident had 0.1 percent *more* transit service (Table 3 and Figure 10).

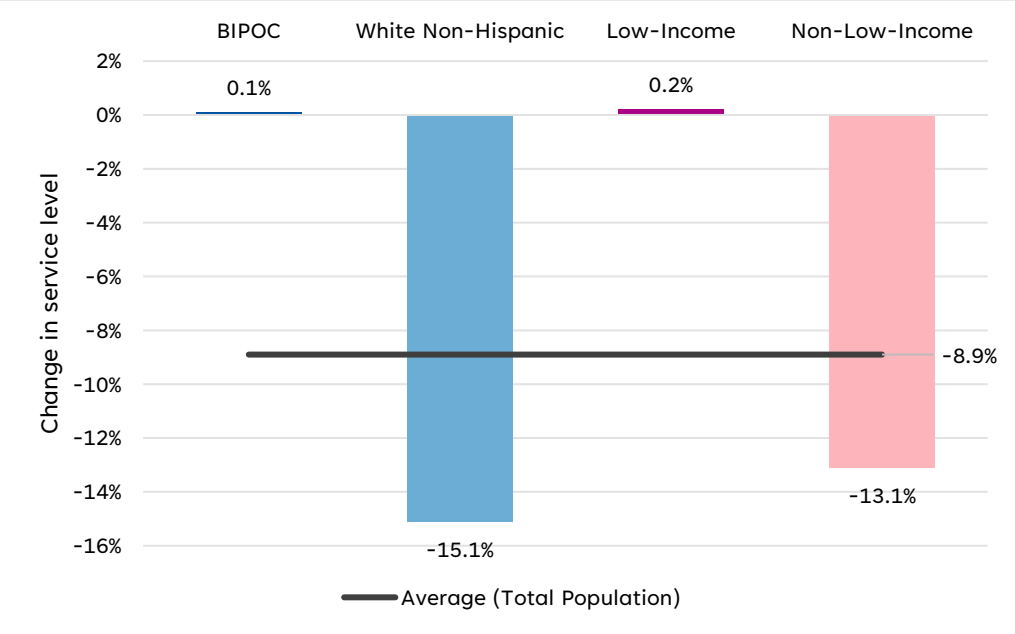
The average non-low-income resident had 13.1 percent less service, while the average low-income resident had 0.2 percent *more* service in 2023 than in 2019.

Table 3. Average percent change in service: September 2019 to December 2023 service changes

Population group	Average percent change in service
Communities of color	+0.1%
White non-Hispanic	-15.1%
Low-income	+0.2%
Non-low-income	-13.1%
Total population	-8.9%

Source: SRF analysis of Metro Transit and Census data.

Figure 10. Change in service level by population group, 2019-2023



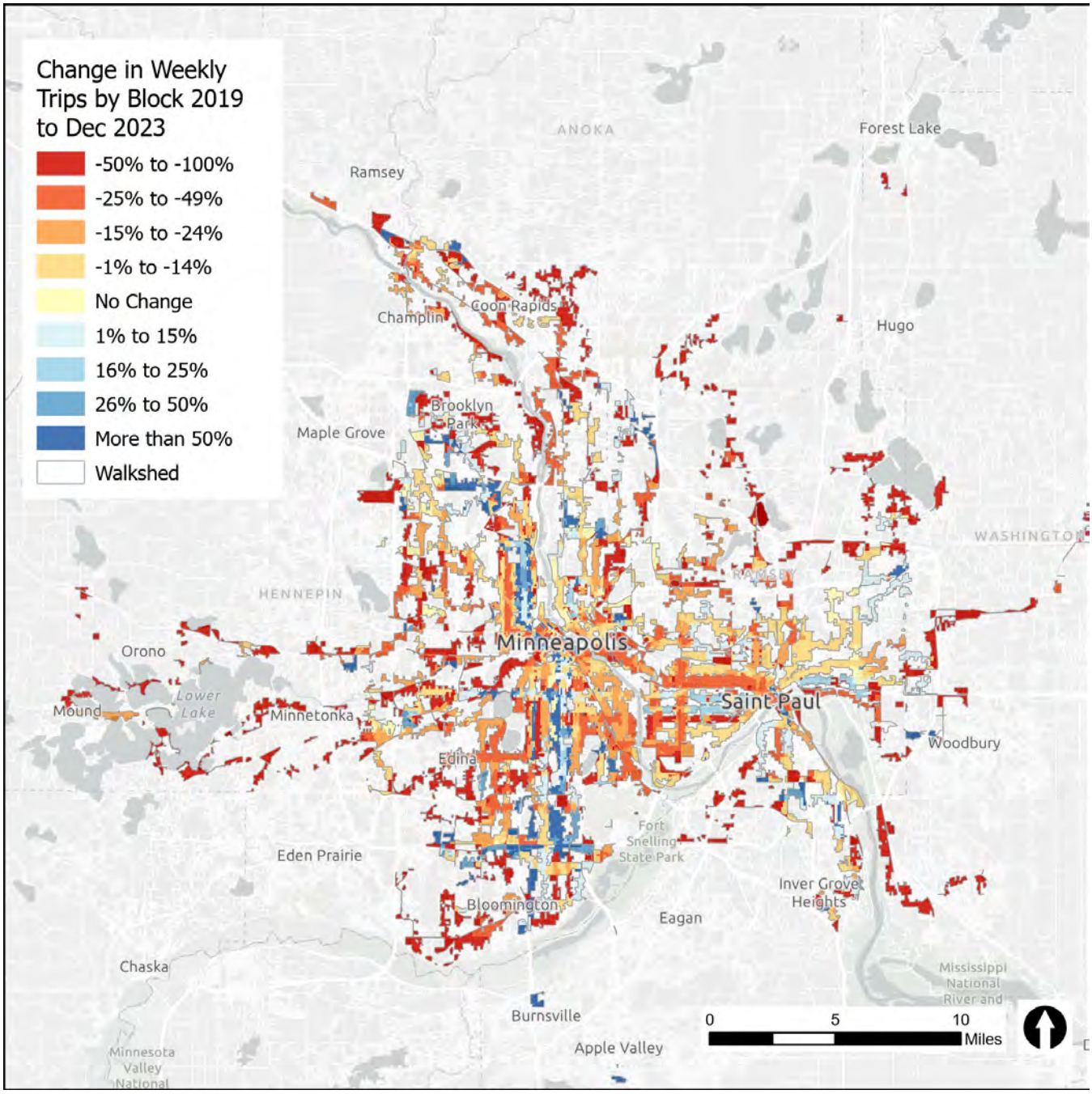
Source: SRF analysis of Metro Transit and Census data.

These results are consistent with the strategy behind Metro Transit's COVID-19 response, which sought to follow equity principles, maintain core frequent service, and continue to serve the riders who relied most on transit. Service cuts on the routes most critical to BIPOC and low-income populations were avoided as much as possible during 2020 to 2022; as a result, these routes experienced relatively few service restorations in 2023, and thus have relatively low percentage increases on a year-to-year basis.

As Figure 11 and Figure 12 illustrate, the net reductions in service resulting from COVID continue to be seen systemwide. However, there are also areas of growth associated with existing and planned

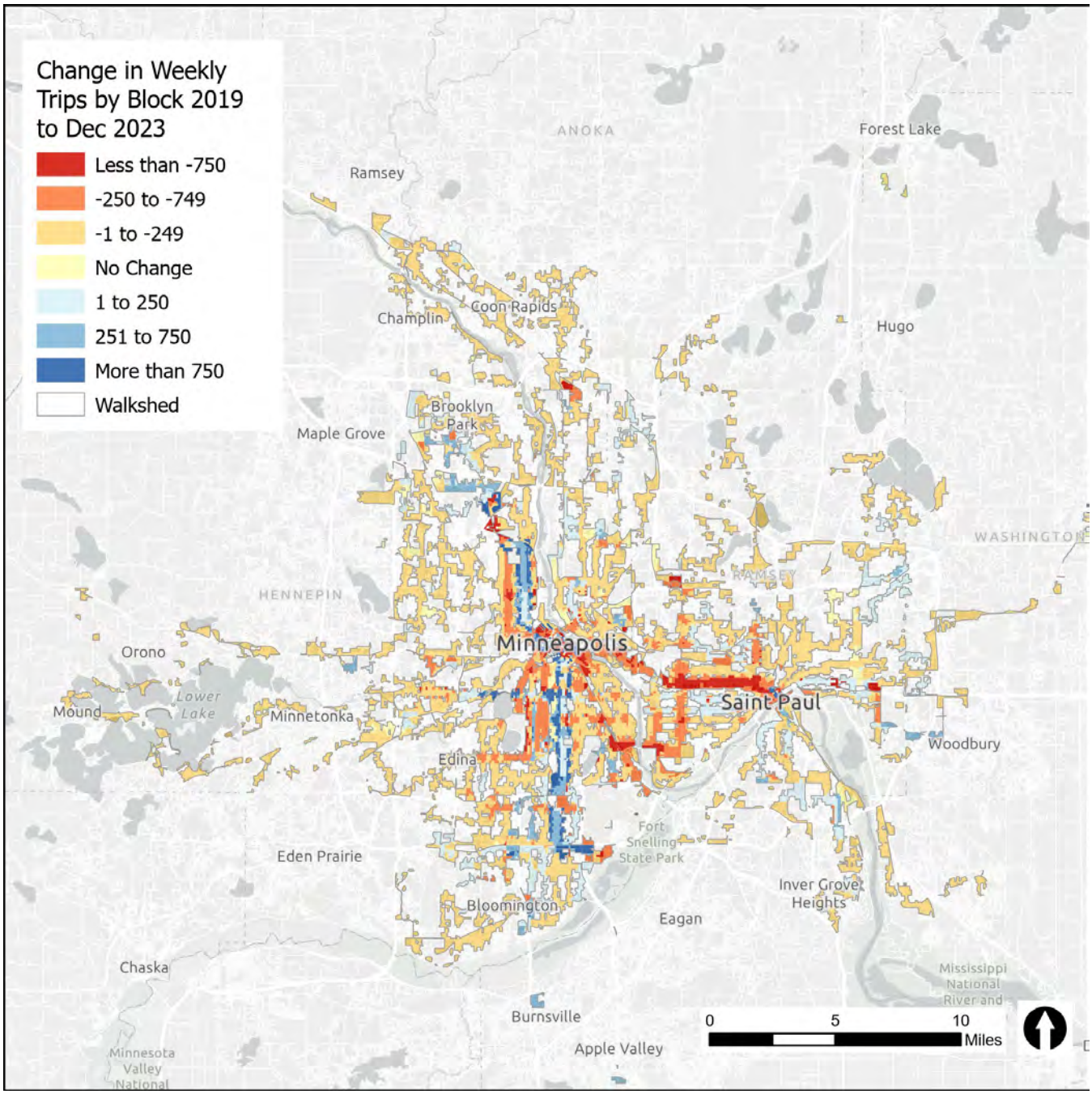
transitways. These include the METRO Orange Line corridor, the METRO D Line bus rapid transit service launched in December 2022, and routes connecting to rapid transit lines.

Figure 11. Percent change in service by Census block, September 2019 to December 2023



Source: SRF analysis of Metro Transit and Census data.

Figure 12. Absolute change in service by Census block, September 2019 to December 2023



Source: SRF analysis of Metro Transit and Census data.

Conclusion

The purpose of service equity analysis is to ensure that BIPOC residents do not experience disparate impacts and low-income residents do not experience disproportionate burden when changes are made to transit service. While potential disparate impact and disproportionate burden were identified when considering impacts on a percentage basis from December 2022 to December 2023, additional analyses show this not to be the case.

When considering service changes for BIPOC and white non-Hispanic populations by residential location:

- BIPOC residents experienced an average increase of 63 weekly trips (10.3 percent)
- White non-Hispanic residents experienced an average increase of 69 weekly trips (12.6 percent)

Both groups experienced an overall increase in service. Areas with the highest *percent* increase in service tended to occur in suburban areas (Figure 4). These areas often coincide with lower concentrations of BIPOC residents (Figure 1). However, when considering the ridership demographics of the suburban routes such as the 219, 227, and 724, these routes show greater usage by BIPOC residents. Thus, while the analysis may appear to show disparate impact, BIPOC transit riders are likely to benefit from the service increases which occurred between 2022 and 2023.

When considering service changes for low-income and non-low-income populations by residential location:

- Low-income residents experienced an average increase of 71 weekly trips (10.5 percent)
- Non-low-income residents experienced an average increase of 74 weekly trips (12.1 percent)

In a similar pattern to BIPOC versus white non-Hispanic residents, high percentage service increases tend to occur in areas without high concentrations of low-income residents. However, survey data show that riders of routes experiencing the greatest increases in service are more likely to be low-income. Additionally, low-income riders experienced an absolute increase in service which exceeds Metro Transit's 90 percent threshold relative to non-low-income residents. Thus, low-income residents are likely to benefit from the service increases which occurred between 2022 and 2023. Moreover, when viewed as a continuum from 2019 to 2023, Metro Transit's service changes related to the COVID-19 pandemic have continued to preserve more service for BIPOC and low-income populations on a percentage basis than for white-non-Hispanic and low-income populations.

Committee Report

Transportation Committee

Committee Meeting Date: October 28, 2024 **For the Metropolitan Council:** November 13, 2024

Business Item: 2024-305

Fare Policy Changes Title VI Analysis

Proposed Action

That the Metropolitan Council approve the results of the Title VI Service Equity Analysis for the removal of local peak fares (which subsequently impacts the peak fare offered by Metro Mobility), reduced peak fares and the end of the pilot on routes 32 & 62.

Summary of Transportation Committee Discussion/Questions

Fare Policy Changes Title VI Analysis (Dennis Dworshak, Andrea Kiepe)

It was moved by Morales, seconded by Pacheco

Motion carried.

Business Item

Transportation Committee

Committee Meeting Date: October 28, 2024 **For the Metropolitan Council:** November 13, 2024

Business Item: 2024-305

Fare Policy Changes Title VI Analysis

District(s), Member(s):	All
Policy/Legal Reference:	OEEO 6-1 Title VI Major Service Change Policy; OEEO 6-2 Title VI Disparate Impact and Disproportionate Burden Policy; FTA Circular 4702.1B
Staff Prepared/Presented:	Lesley Kandaras, General Manager, 612-349-7513
	Jillian Linnell, Chief of Staff, 612-349-7510
	Zecharias Hailu, Assistant Director OEEO, 651-602-1778
	Edwin Petrie, Director Finance 612-349-7624
	Dennis Dworshak Sr Manager, Revenue Operations (612) 349-7364
	Andrea Kiepe, Community Outreach Coordinator 612-349-7747
Division/Department:	Transportation, Metro Transit and Metropolitan Transportation Services

Proposed Action

That the Metropolitan Council approve the results of the Title VI Service Equity Analysis for the removal of local peak fares (which subsequently impacts the peak fare offered by Metro Mobility), reduced peak fares and the end of the pilot on routes 32 & 62.

Background

1. On February 28, 2024, The Metropolitan Council approved a major upgrade of the technology and hardware devices of the regional fare collection system. This upgrade provides an opportunity for significant fare simplification of the regional system.
2. Over the past 10 months, Metropolitan Council staff, along with regional stakeholders and a fare collection consultant, determined a two-phased fare simplification plan would benefit the regional transit agencies and the transit customers.
3. Phase I of fare policy changes will include the following modifications:
    a. Removal of local peak (rush hour) fares reducing the fare from $2.50 to $2.00 and peak reduced fares from $2.50 to $1.00 for all regional transit providers participating in the regional fare structure and adjust the following fare products:
        i. All Day Pass from $5.00 to $4.00
        ii. Reduced Fare All Day Pass from $5.00 to $2.00
        iii. 10 Ride Pass Full Fare from $20.50 to $20.00
        iv. Seven Day Pass from $24 - $20
        v. Eliminate $90.00 (31 Day) local peak and the $5.00 visitor pass
    b. Modify the Metro Mobility peak fare, from $4.50 to $4.00

c. Modify Metro Mobility peak fare hours to 6:30AM-9:30AM and 2:00PM to 5:30PM
d. Expand Transit Assistance Program (TAP) eligibility from one to two years, to be implemented in 2025, once the fare technology is available.
e. Approve a 6-month deeply discounted fare pilot for Metro Mobility customers to ride on regional fixed routes for $.01, effective 1/1/2025 – 6/30/2025.
f. Provide a new fare of $1.00 for Transit Link Circulator Service.
g. Unless otherwise noted, the fare change will be implemented in January 2025.

4. Metro Transit is required by the Federal Transit Administration ("FTA") to conduct a Title VI Service Equity Analysis for all permanent fare changes. FTA Circular 4702.1B states a Title VI fare equity analysis requirement applies to all fare changes regardless of the amount of increase or decrease. As with the service equity analysis, FTA requires transit providers to evaluate the effects of fare changes on low-income populations in addition to Title VI-protected populations to determine whether planned changes will have a disparate impact and disproportionate burden.
5. In line with Federal guidance, a Title VI analysis was conducted to evaluate:
    a. Removal of local peak (rush hour) fares reducing the fare from $2.50 to $2.00 and peak reduced fares from $2.50 to $1.00 for all regional transit providers participating in the regional fare structure
    b. End of the Free Fare Pilot on Routes 32 and 62 (Transit Fare Elimination Pilot Program)
6. 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 review finds that the proposed service changes would not result in disparate impact on Black Indigenous and Persons of Color ("BIPOC") populations nor disproportionate burden on low-income populations.

Rationale

FTA Circular 4702.1B requires FTA transit providers to evaluate the effects of any fare change based on income, race, color, and national origin. A fare equity analysis is needed in these cases and is a requirement regardless of a fare increase or decrease.

Thrive Lens Analysis

Transit fare simplification advances *Thrive MSP 2040* regional outcomes by providing riders with transit rides on local routes for the same fares throughout the day without morning and afternoon surcharges. It removes cost barriers for seniors and youth transit customers by eliminating the significant fare increases during the morning and evening peak times resulting in projected increased ridership. Increasing transit ridership and reducing barriers for people to ride transit would help contribute to regional stewardship, prosperity, livability, equity, and sustainability using a data driven approach to measure the effectiveness of the Council's efforts.

Funding

The Service Equity Analysis costs are included in the annual operating budget.

Small Business Inclusion

This request is for Council Approval of completed Title VI Analysis and will not require small business inclusion.

Proposed Fare Policy Changes

October 23, 2024

Overview

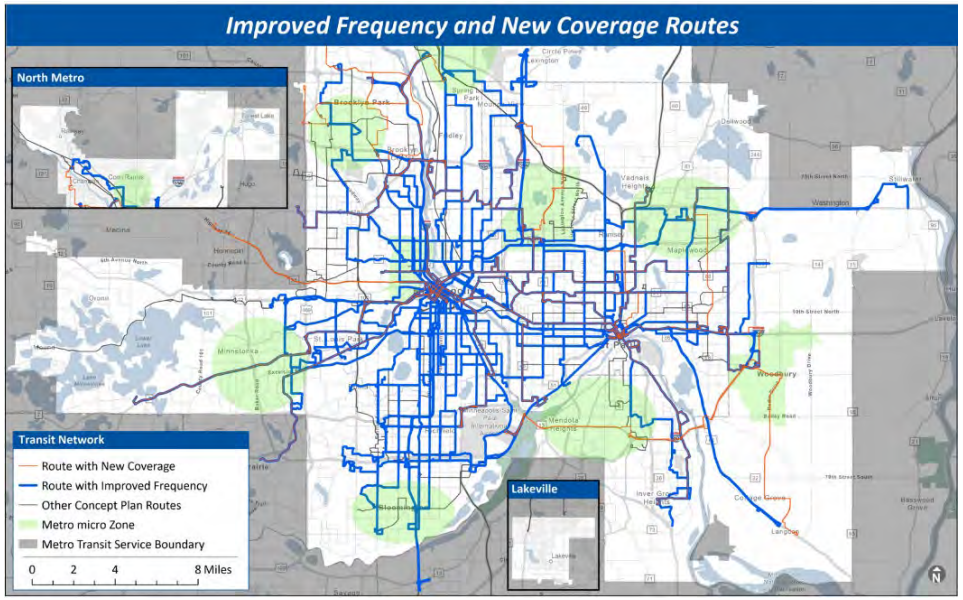
- Fare Policy Change – Why Now?
- Met Council Fare Policy Authority & History
- Metropolitan Council Regional Fare Collection System & Fare Structure Overview
- Fare Collection System Upgrade
- Proposed Fare Policy Changes
- Next Steps

Vision for Transit

- Working to advance a vision for transit that includes:
  - Proposed fare policy changes
  - New coverage and increased frequency outlined in Network Now
  - Continued METRO system expansion
  - Improving conditions on transit as outlined in the Safety & Security Action Plan







Fare Policy Change | Why Now?

- **Improve Customer Experience:** Overall fare payment will be easier for riders to understand
  - Improved experience for all customers (new or returning) region wide
- **Increase Ridership:** Peak-hour reduction in local fare costs will help respond to post-Covid ridership trends, and encourage riders back to transit
  - Allows customers to travel when they need to without considering cost (on local routes)
- **Improve Safety:** Helps support a safer system for both riders and operators
- **Equity:** Removal of peak surcharge for youth (ages 6-12), seniors (65+) and Medicare card holders

Council Authority and History on Fare Policy

- MN Statute 473.408 establishes the Metropolitan Council's authority to establish and enforce fare policies
- Metropolitan Council policy, which is aligned with Federal statute, further outlines the different types of fare policy changes and the required public hearing process
  - FM 12-2 Transit Fare Policy Changes Policy & FM 12-2A Transportation Service Fare Policy Changes Procedure
- The last fare adjustments went into effect on October 1, 2017
  - Fare adjustments were made to generate additional fare revenue, promote equity and simplify the fare structure.

Fare Adjustments Approved October 2017

Major Fare Adjustments	Adjustment Amount
Local and Express Fares	$0.25 Increase
Metro Mobility	$0.50 Base Increase $0.75 Distance Surcharge (non-ADA)
Transit Link	$1.60 Avg. Increase $0.75 Distance Surcharge
Transit Assistance Pass (TAP)	$1.00 Fare (New Program)
Limited Mobility	$0.25 Increase
Transit Schools Discount	Eliminate Discount (5% - 10%)
Eliminate Stored Value Bonus	Eliminate 10% Bonus

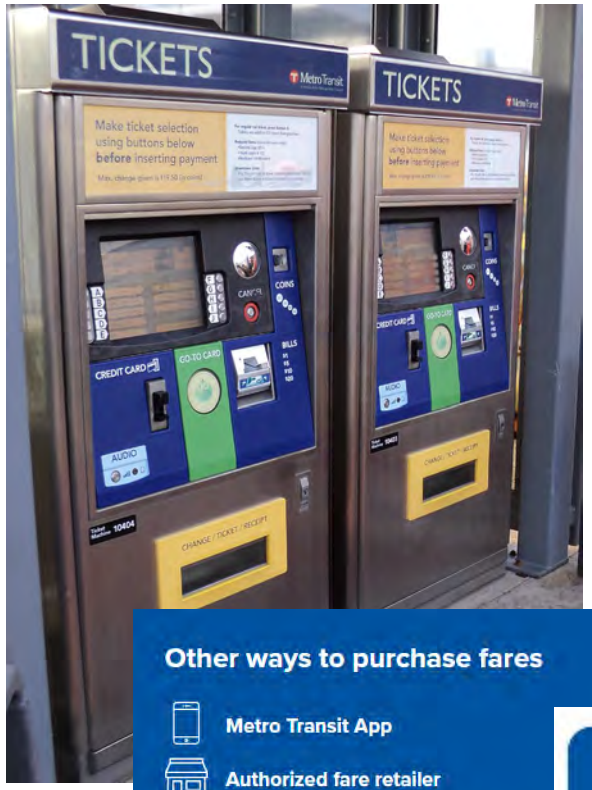
Metropolitan Council Fare Collection

- Rail and Bus Rapid Transit
  - Proof of Payment System
  - Carry a ticket, pass or smart card
  - Prove valid fare was paid
  - Random fare inspection spot checks
- Fixed Route Buses
  - Pay upon boarding (farebox, tap validator, Mobile App flash pass)
- Metro Mobility
  - Pay upon boarding (tap validator/ pay operator cash)



Where to Pay your Fare

- Web store
- Retail Partners
- Mobile App
- Offboard
  - Ticket Vending Machines
    - Flowbird - Bus Rapid Transit & Cubic – Rail platforms
  - Platform Validators
- On Board
  - Fareboxes
  - Bus Mobile Validators



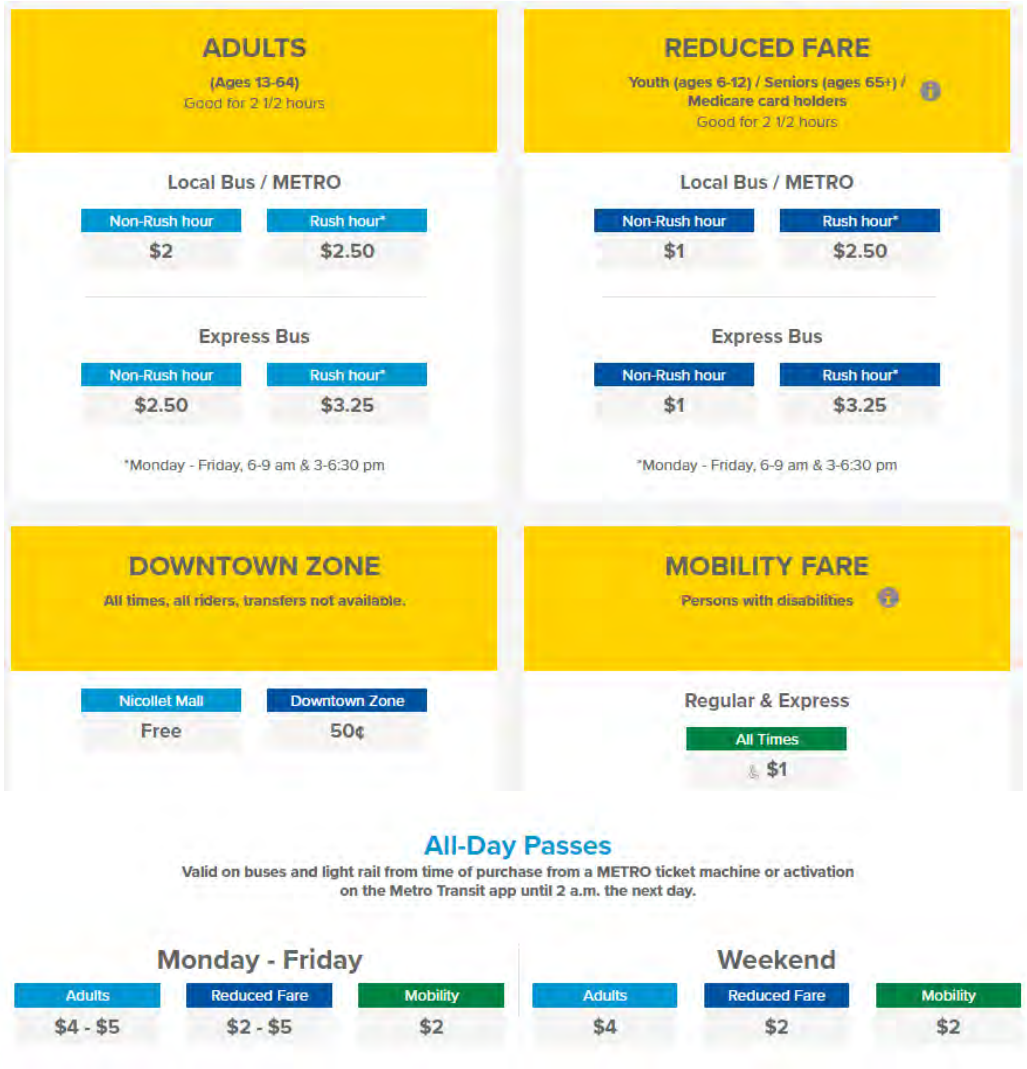


Other ways to purchase fares

- Metro Transit App
- Authorized fare retailer
- Ticket machine on rail platforms
- By mail
- By phone 612-373-3333

Current Fare Structure

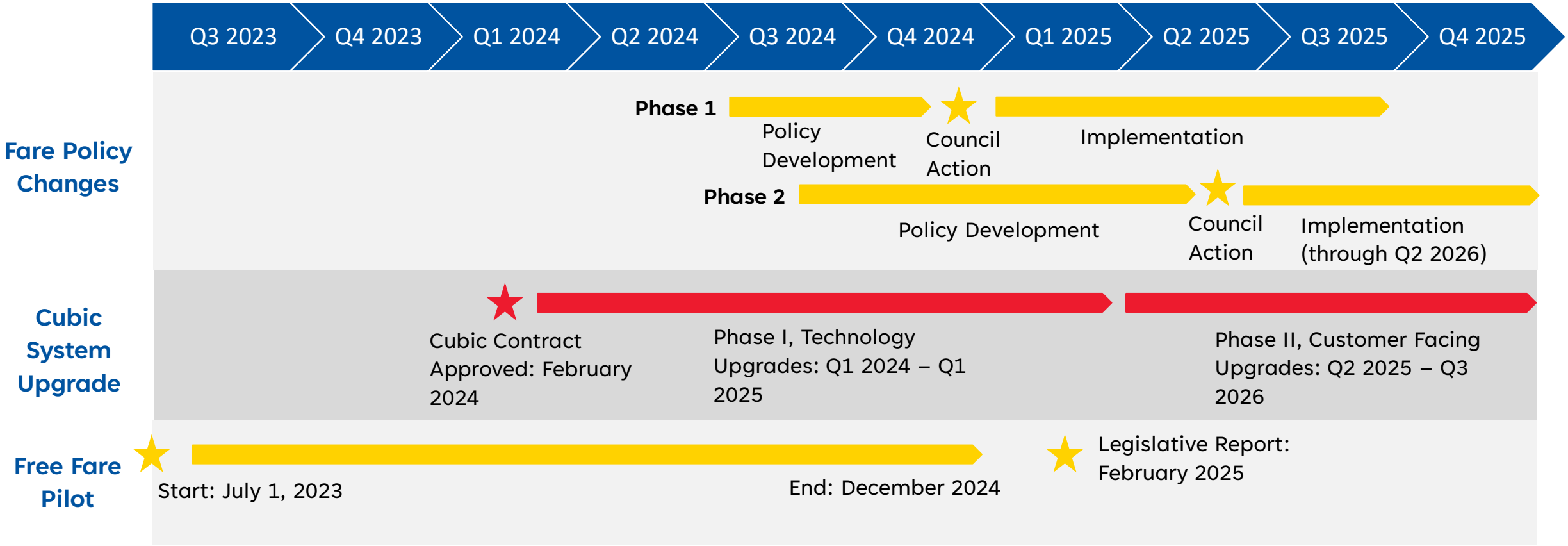
- Combination of one-way fares, all-day and multi-day passes
- Pass Programs
  - Transit Assistance Program (TAP), for low-income riders
  - Metropass, companies and organizations can enroll for unlimited regional bus and trains for $83/month
  - Student Pass and College Pass



Fare Collection System Upgrade

- Current system was installed in 2004
- Planned upgrade for easier customer payment system-wide, includes contactless payment methods & system device upgrades and technology enhancements
- System upgrade will also offer an opportunity to review the Go-To Brand and the Webstore
  - Assessing minimal to comprehensive rebranding, including possible renaming and redesign
  - Opportunity to redesign the webstore for purchasing tickets.
- Phased Approach:
  - Q1 2024 – Q1 2025: Phase I, Technology Upgrades;
  - Q2 2025 – Q3 2026: Phase II, Customer Facing
- On Feb 28, 2024, the Council approved a sole source contract with Cubic Transportation Systems to upgrade technology and devices for an amount not to exceed $37.7 million.
  - 2024-47.aspx (metrocouncil.org)

Fare Policy & System Upgrade Timeline



Proposed Fare Policy Changes | Two Phases

- **Phase 1 – Near-Term Fare Policy Opportunities**
  - Collection of Metro Transit and Metro Mobility fare policy changes that will offer near-term rider benefits and address current ridership trends
  - Timeline: Approve by the Council in November for implementation January 1, 2025
- **Phase 2 – Comprehensive Fare Policy Review**
  - In coordination with the fare collection system upgrade, Clevor Consulting Group and Council stakeholders are currently undertaking a comprehensive fare policy review and assisting in the effort to align our fare policy with, (1) industry standards and trends, (2) technology upgrades and (3) schedule
  - Possible changes include:
    - Open payment, transfer policy, fare capping, eliminate peak express, adjust Metro Micro fare, evaluate pass programs, and more.
  - Timeline: Mid-2025

Fare Policy | Key Transit Industry Trends

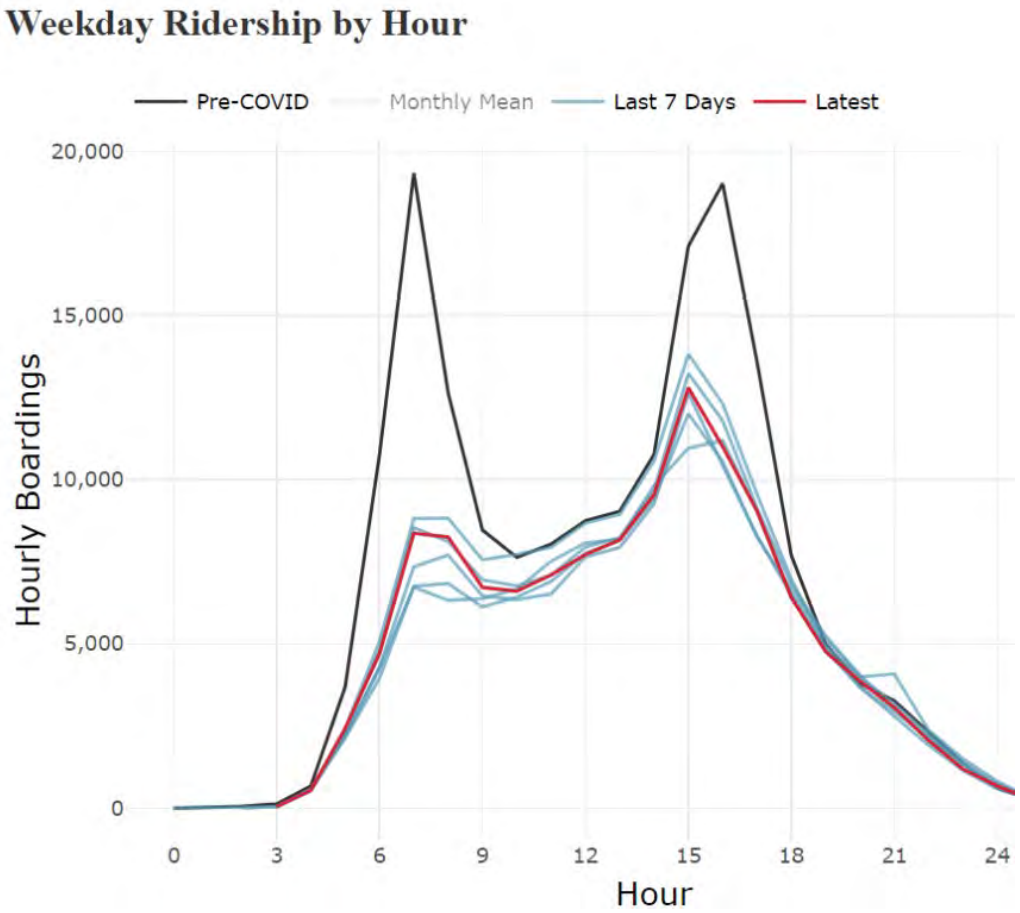
- Peak/off-peak fares uncommon as part of the core fare structure for bus & light rail
- Senior/Disability Fares most often provided ALL-DAY
- Senior & Disability riders usually included in the same fare category
- Fare capping predominantly in systems that have a simple ‘flat’ fare structure



Transit agencies across the U.S., both large and small, have pursued initiatives to simplify their fare policies and improve the overall customer experience.

Fare Policy | Key Ridership Trends

- Reduced ridership during peak hours
  - Reduced 65% am peak
  - Reduced 35% pm peak
- Reduced ridership
  - Mondays/Fridays due to hybrid schedules



Phase 1 | Fare Simplification

- Simplify regional fare for non-express routes including bus and light rail
  - End rush hour surcharge for non-express bus and METRO
  - Update relevant regular fare pass products
    - Update: All-day ($4 adult, $2 reduced), & Reduced Fare 7-day ($20), 10-ride pass $20
    - Eliminate: Peak 31 day & Visitor Pass
  - In Phase 1, we will not change fares for
    - Express bus, Northstar, Metro Micro / Transit Link or Downtown Zone

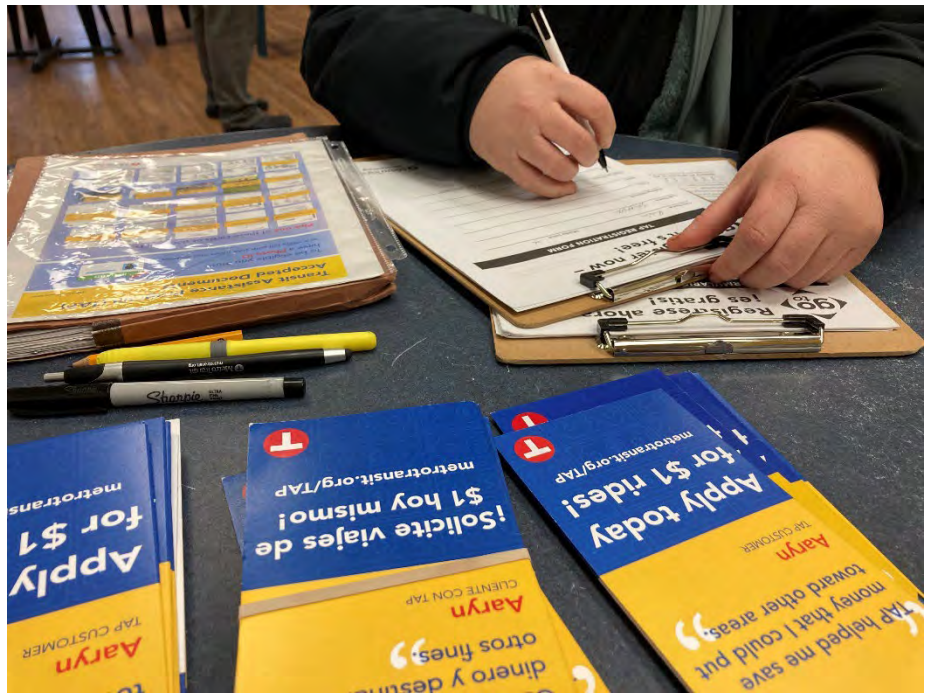
Metro Transit Proposed Fare Policy Changes		
	Current Peak	Proposed All Day
Adult Fare on Local bus/METRO	$2.50	$2.00
Reduced Fare (youth, seniors & Medicare)	$2.50	$1.00

Phase 1 | Transit Assistance Program (TAP)

- Reduced fare pass for people with low incomes
  - Year-long reduced fare pass on a Go-To Card
  - Customers can use a bus or train for just $1 per ride – even during rush hour
  - Launched in 2017 after a series of pilots
- Highest ridership pass program post COVID, with 4,792 enrolled in program;
  - Average of 22 monthly rides per TAP customer
  - 800,000 TAP program rides through September 2024, which is a 14.1% (100k rides) increase over previous year through September
- Customers can apply online or at a Service Center with an ID or eligibility document
- Metro Transit staff hold enrollment events, and work with community organizations to help sign up qualified customers.



Phase 1 | Transit Assistance Program Improvements



- Phase I TAP Improvements:
  - Expand TAP program eligibility from one to two years
    - Will be implemented in 2025, once the fare technology has been installed
  - Increased effort to improve TAP utilization
    - Added FTE to assist with growing the TAP program
    - Continued focus on signing charitable organizations and municipal TAP partner agreements
    - Increasing TAP tabling events to spread awareness
    - Training TRIP agents to sign up eligible customers while out on the system
    - 21 Additional partner TAP agreements signed in 2024

Phase 1 | Fare Simplification Rider & Revenue Impact

- Eliminating peak fares is estimated to have the following rider and revenue impacts:
  - Adult Fare on Local bus/METRO:
    - Ridership Increase: 862K
    - Revenue impact: $3.9M below current projections
  - Reduced Fare (youth, seniors & Medicare):
    - Ridership increase: 64K
    - Revenue impact: $209K below current projections

Phase 1 | MTS Proposed Changes

- Metro Mobility change peak fare and modify AM and PM peak hours
  - Proposed new AM Peak Hours: 6:30AM – 9:30AM (3 hours)
  - Proposed new PM Peak Hours: 2:00PM-5:30PM (3.5 hours)
- Add new Transit Link Circulator service with $1 fare ($2 round trip)
- Introduce a 6-month pilot of a deeply discounted fare ($.01 per ride) for Metro Mobility customers on Fixed Route (start after 2024 pilot concludes)

MTS Proposed Fare Policy Changes		
	Current	Proposed
Peak Fare	$4.50	$4.00
Off Peak Fare	$3.50	$3.50
Transit Link Circulator Fare	-	$1.00
Metro Mobility Certified rider on regular route bus/train	$0.00 legislatively required through 12/31/2024	$0.01 six-month pilot, 1/1/2025 – 6/30/2025

Phase 1 | Title VI

Target Date for Completion – October 28, 2024

Priority on analysis for removal of Peak Fares

Title VI Analysis Includes:

- Removal of Peak Reduced Fares
- Removal of Local Peak Fares
- End of Pilot Routes 32/62

Not included in Analysis:

- $1 Transit Link Circulator
  - New service, Title VI not necessary
- Deep Discount for Metro Mobility on Fixed Routes
  - Pilot Program; exempt from Title VI for up to 12 months

Free Fare Pilot

- Legislative requirement to establish:
  - Pilot program to provide transit service for free on two regular route bus lines (32/62)
  - Provide regular route transit free of charge for Metro Mobility customers
  - Pilot service must run from July 1, 2023 – December 31, 2024
- Legislative Report: due February 15, 2025
  - Must include an evaluation of effects of the pilot (ridership, travel time, service equity and rider experience), a review of fiscal impacts, an analysis of barriers, best practices, economic impacts and recommendations regarding subsequent implementation of free or reduced-fare transit service
- Early Results:
  - Ridership grew on free-fare routes relative to peers
  - Faster boardings

Next Steps

- **Fare Policy Phase 1**
  - October 28th: Transportation Committee Business Item to approve fare adjustments
    - Will include results of Title VI analysis
  - November 13th: Council Item to approve fare adjustments
  - January 1, 2025: Fare policy changes become effective, including six-month pilot for $0.01 on regular route for Met Mo certified
    - TAP program changes will be implemented in 2025 as new technology comes on-line
- **Fare Policy Phase 2**
  - Will return to the Council in mid-2025 with the results of consultant's work and possible comprehensive fare policy proposal
- **Free Fare Pilot**
  - November: Begin communicating the end of the free fare pilot
  - January 1, 2025: Discontinue free fares on Route 62 and 32
  - February 15, 2025: Submit legislative report

Title VI Fare Equity Analysis

2024 Fare Simplification and Return to Fare Collection on Routes 32/62

November 2024

Metro Transit

Prepared by:

SRF

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, Metro micro, Metro Move, 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.

TABLE OF CONTENTS

Executive Summary **6**

Chapter 1: Introduction **10**

Report Purpose 10

Proposed Fare Changes 10

Regional Fare Structure 12

Federal Requirements 12

Chapter 2: Existing and Proposed Fares **13**

Factors Affecting Existing Fares 13

Proposed Fare Changes 15

Chapter 3: Title VI Principles and Definitions **17**

Title VI and Environmental Justice 17

Requirement to Conduct Fare Equity Analyses 18

Title VI Definitions of Minority and Low-Income Populations 20

Chapter 4: Analysis Methodology **22**

Process 22

Data Sources 22

Cleaning Survey Data 23

Cleaning Farebox Data 24

Combining Data Sources 25

Chapter 5: Evaluation of Impacts from Fare Simplification **28**

Proposed Changes 28

High-Level Analysis 28

Fare Media Analysis 32

Chapter 6: Evaluation of Impacts from End of Routes 32/62 Pilot **34**

High-Level Analysis 34

Fare Media Analysis 36

Chapter 6: Conclusions **38**

Appendix A: Fare Changes in Detail **39**

TABLE OF FIGURES

Figure 1. Existing Base Fare Structure 13
Figure 2. Existing Day Pass Fare Structure 14
Figure 3. Fare Media by Race and Ethnicity Status 27
Figure 4. Fare Media by Income Status 27
Figure 5. Demographic Profile - BIPOC 30
Figure 6. Demographic Profile - Low-Income 31
Figure 7. Demographic Profile of Routes 32/62 - BIPOC 34
Figure 8. Demographic Profile of Routes 32/62 - Income 35

TABLE OF TABLES

Table 1. Fare Simplification: Existing and Proposed Fares 15
Table 2. End Fare-Free Pilot: Fare Comparison for Route 32 and 62 16
Table 3. 2022 Department of Health and Human Services Poverty Guidelines in Dollars 21
Table 4. On Board Survey Variables Applicable to Analysis 23
Table 5. Identification of Low-Income Riders for Analysis 24
Table 6. Fare Media Assignments by TBI On Board Survey Records 25
Table 7. Estimated Route 2 Adult Riders by Fare Medium, BIPOC, and Low-Income Status 26
Table 8. Fare Combinations with Average Weekday Ridership 29
Table 9. Average Change in Fare Comparison - Fare Simplification High-Level Analysis 32
Table 10. Average Fare per Trip by Demographic Group – Fare Media Analysis 33
Table 11. Routes 32/62 Fare Comparison - High-Level Analysis 36
Table 12. Routes 32/62 Fare Comparison – Fare Media Analysis 37

EXECUTIVE SUMMARY

Metro Transit and the Metropolitan Council, in coordination with other regional transit providers, are evaluating two future fare changes:

- The first is a proposed package of fare changes that would simplify the regional fare structure and decrease fares slightly for the average rider of local bus routes, bus rapid transit, and light rail. The 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 all Local / METRO service in early 2025.
- The second is a planned return to fare collection on Routes 32 and 62, following the scheduled sunset (December 2024) of an 18-month fare-free pilot program on those routes.

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. It also fulfills this requirement as it relates to fare changes planned as part of the end of the fare-free pilot.

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 transit system easier to understand and more convenient to use for both existing and potential riders. Toward this effort, Metro Transit is analyzing the following changes:

- Eliminate the rush-hour surcharge for all riders on Local Bus / METRO service, resulting in:
    - Flat $1.00 single fare for the Youth/Senior fare type
    - Flat $2.00 all-day pass for the Youth/Senior fare type
    - Flat $2.00 single fare for the Adult fare type
    - Flat $4.00 all-day pass for the Adult fare type
- Lower the Adult 10-Ride Pass from $20.50 to $18
- Restructure other passes for all users:
    - Eliminate $90 31-Day pass
    - Lower 7-Day pass from $24 to $20
    - Lower Metropass from $83 to $75 per month
    - Lower College Pass from $165 to $152 per semester
    - Lower Student Pass from $97 to $90 per quarter
    - Lower Event Pass from $4.50 to $4.00

These changes would result in the dollar payments detailed in Table i.

Table i. Existing and Proposed Fares

Fare Type	Fare Set	Fare Product	Existing Fare	Proposed Fare	Absolute Change	Percent Change
Adult	Local Bus / METRO Peak	Cash, Stored Value, Token, Coupon	$2.50	$2.00	-$0.50	-20%
Youth/Senior	Local Bus / METRO Peak	Cash, Stored Value, Token, Coupon	$2.50	$1.00	-$1.50	-60%
All	All	7-Day Pass	$24.00	$20.00	-$4.00	-17%
All	All	31-Day Pass Local Peak	$90.00	Discontinued	N/A	N/A
All	All	Metropass	$83.00	$75.00	-$8.00	-10%
All	All	College Pass	$165.00	$152.00	-$13.00	-8%
All	All	Student and MPS Student Pass	$97.00	$90.00	-$7.00	-7%
All	All	10-Ride Pass	$20.50	$18.00	-$2.50	-12%
All	All	Visitor Pass	$5.00	$4.00	-$1.00	-20%
All	All	Event Pass	$4.50	$4.00	-$0.50	-11%
Adult	Peak	All Day Pass	$5.00	$4.00	-$1.00	-20%
Youth/Senior	Peak	All Day Pass	$5.00	$2.00	-$3.00	-60%

End of Fare-Free Pilot on Routes 32/62

Separately, Metro Transit is analyzing the return to existing fares when an 18-month fare-free pilot for Route 32 and Route 62 ends in December 2024. This will entail a return to the existing fare structure for riders of those routes, including:

- Adult fare: $2.50 peak, $2.00 off-peak
- Youth/Senior fare: $2.50 peak, $1.00 off-peak
- Mobility fare: $1.00

Framework for Evaluating Impacts

The purpose of this report is to evaluate planned fare changes to ensure the impacts of those changes will 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 will 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 "90 percent rule," which states that there may be evidence of disparate impact if:

- Benefits are being provided to BIPOC populations at a rate less than 90 percent of the benefits being provided to white populations, or
- Adverse effects are being borne by white populations at a rate less than 90 percent of the adverse effects being borne by BIPOC populations.

Metro Transit uses the same framework when evaluating whether low-income populations will experience disproportionate burden relative to the impacts on non-low-income populations.

Summary of Results

Tables ii and iii summarize the results of a high-level analysis and a more detailed analysis based on farebox data. They show the average percent change in fare for each population group as a result of the fare simplification as well as the comparison index – used for determining disparate impact and disproportionate burden – under the proposed fare changes. Methodology and explanation of the two analysis methods can be found in Chapter 4: Analysis Methodology.

Table ii. Fare Simplification Results by Rider Group: High-Level Analysis

Measure	BIPOC Riders	White Riders	Low-Income Riders	Non-Low-Income Riders
Percent Change in Average Fare	-10.1%	-9.9%	-9.5%	-9.5%
Comparison Index	1.02		1.00	
Disparate Impact / Disproportionate Burden?	No		No	

Table iii. Fare Simplification Results by Rider Group: Fare Media Analysis

Measure	BIPOC Riders	White Riders	Low-Income Riders	Non-Low-Income Riders
Percent Change in Average Fare	-18.1%	-18.9%	-17.9%	-18.4%
Comparison Index	0.96		0.97	
Disparate Impact / Disproportionate Burden?	No		No	

Tables iv and v summarize the results of similar analyses conducted for the end of the Routes 32/62 fare-free pilot. They show the average fare paid on Routes 32/62 by each population group after the end of the fare-free pilot, as well as the comparison index calculated for differences among groups.

Table iv. Routes 32/62 Results by Rider Group: High-Level Analysis

Measure	BIPOC Riders	White Riders	Low-Income Riders	Non-Low-Income Riders
Average Fare	$1.80	$1.70	$1.76	$1.85
Comparison Index		0.95		1.05
Disparate Impact / Disproportionate Burden?		No		No

Table v. Routes 32/62 Results by Rider Group: Fare Media Analysis

Measure	BIPOC Riders	White Riders	Low-Income Riders	Non-Low-Income Riders
Average Fare	$1.68	$1.58	$1.64	$1.72
Comparison Index		0.94		1.05
Disparate Impact / Disproportionate Burden?		No		No

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 do not result in disparate impacts on BIPOC riders or disproportionate burden on low-income riders.

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 lower average fares paid by riders. The 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 Local Bus / METRO routes only.

Separately, the Metropolitan Council will conclude its fare-free pilot program on Route 32 and Route 62 by returning to the existing fare structure on those routes. The fare-free pilot was completed in compliance with legislation passed by the State of Minnesota in 2023 (HF 2887).

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 reviews 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, or national origin, and whether there would be disproportionate burden on low-income riders.

Proposed Fare Changes

Fare Simplification

Metro Transit is analyzing the following fare change scenario:

- Eliminate the rush-hour surcharge for all riders on Local Bus / METRO service, resulting in:
  - Flat $1.00 single fare for the Youth/Senior fare type
  - Flat $2.00 all-day pass for the Youth/Senior fare type
  - Flat $2.00 single fare for the Adult fare type
  - Flat $4.00 all-day pass for the Adult fare type
- Lower the Adult 10-Ride Pass from $20.50 to $18
- Restructure other passes for all users:
  - Eliminate $90 31-Day pass
  - Lower 7-Day pass from $24 to $20
  - Lower Metropass from $83 to $75 per month
  - Lower College Pass from $165 to $152 per semester
  - Lower Student Pass from $97 to $90 per quarter
  - Lower Event Pass from $4.50 to $4.00

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 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.[1]

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. 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.[2]

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.[3]

End of Fare-Free Pilot on Routes 32/62

Separately, Metro Transit is analyzing the return to existing fares when an 18-month fare-free pilot for Route 32 and Route 62 ends in December 2024. This will entail a return to the existing fare structure for riders of those routes, including:

- Adult fare: $2.50 peak, $2.00 off-peak
- Youth/Senior fare: $2.50 peak, $1.00 off-peak
- Mobility fare: $1.00

While this change will also simplify fares, it is not part of the proposed package. It is included in this report because the two changes would be implemented at approximately the same time.

---

[1] 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.

[2] 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.

[3] Transportation Research Board. TCRP Synthesis 160: Fare Capping: Balancing Revenue and Equity Impacts. 2020. Available at https://www.trb.org/Main/Blurbs/182679.aspx.

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, 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.[4] 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 local bus services offered by MVTA as well as Metro Transit.

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. It also fulfills the requirement as it relates to fare changes planned as part of the end of the fare-free pilot.

[4] 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 Local Bus / METRO and Express Bus services in the region. 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

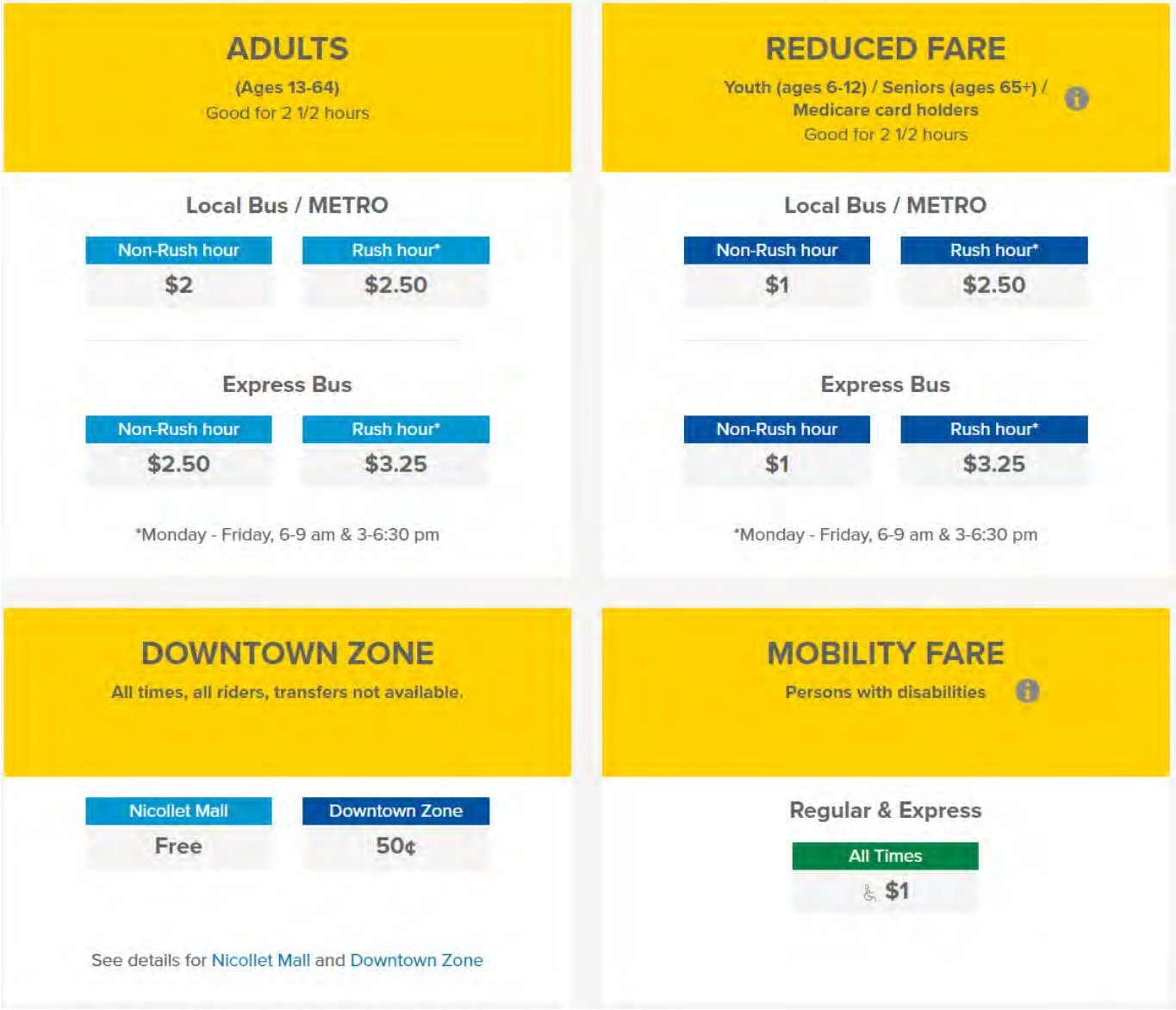
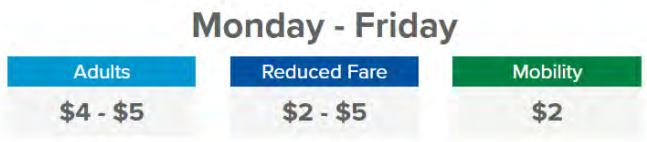


Figure 2. Existing Day Pass Fare Structure



Fare Types

There are four primary fare types (as indicated in Figure 1) and a fifth supplemental fare type. The **Adult** fare type is available to people ages 13 to 64. The **Reduced** fare type, referred to in this report as **Youth/Senior**, 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. The **Mobility** fare type 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 & Times of Day

Currently, the fare for Adult and Reduced Fare types differs by service type and time of day. For purposes of fare policy, there are three service types: **Local Bus / METRO** (e.g., light rail, rapid bus); **Express Bus;** and **Northstar Commuter Rail**. 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.

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. In this report, these times of day are referred to as **Peak** and **Off-Peak** respectively.

Payment Methods

Beyond the base fare, 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 cards (at ticket vending machines), through an authorized mobile app, or via a Go-To stored value card – 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 can be loaded onto a Go-To card separately from stored value. 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. Metropass costs $83 per month). 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.

Fare-Free Pilot

In 2023, the Minnesota Legislature passed a transportation finance and policy bill mandating an 18-month fare-free pilot program.[5] The legislation required Metropolitan Council to charge zero fare on two regular route bus lines from July 1, 2023 to December 31, 2024. It also mandated that the pilot program allow Metro Mobility-certified riders to ride for free on Local Bus / METRO lines and Northstar Commuter Rail.

Metropolitan Council selected Routes 32 and 62 for the pilot because, in combination, they serve both the west and east metros and form a mix of core and supporting service. Also, both routes serve corridors with relatively high proportions of BIPOC residents and low-income and/or zero-vehicle households.

Proposed Fare Changes

There are two sets of proposed fare changes analyzed separately in this report. The first set of fare changes simplifies the fare structure by removing peak-hour surcharges. The second set is the return to existing fares when the fare-free pilot concludes. These are treated as unrelated proposals for purposes of analysis.

Fare Simplification

The fare changes analyzed in this report are summarized in Table 1 alongside the absolute and percentage change in fares.

The proposed fare changes remove time of day (Peak and Off-Peak) as a factor for the level of fare on Local Bus / METRO. This means ending the peak single and all-day fares on these routes. It also entails a reduction in the price of passes and the elimination of the 31-Day Local Peak pass.

Table 1. Fare Simplification: Existing and Proposed Fares

Fare Type	Fare Set	Fare Product	Existing Fare	Proposed Fare	Absolute Change	Percent Change
Adult	Local Bus / METRO Peak	Cash, Stored Value, Token, Coupon	$2.50	$2.00	-$0.50	-20%
Youth/Senior	Local Bus / METRO Peak	Cash, Stored Value, Token, Coupon	$2.50	$1.00	-$1.50	-60%
All	All	7-Day Pass	$24.00	$20.00	-$4.00	-17%
All	All	31-Day Pass Local Peak	$90.00	Discontinued	N/A	N/A
All	All	Metropass	$83.00	$75.00	-$8.00	-10%

[5] See Section 122 of HF 2887, https://www.revisor.mn.gov/bills/bill.php?b=House&f=HF2887&ssn=0&y=2023

All	All	College Pass	$165.00	$152.00	-$13.00	-8%
All	All	Student and MPS Student Pass	$97.00	$90.00	-$7.00	-7%
All	All	10-Ride Pass	$20.50	$18.00	-$2.50	-12%
All	All	Visitor Pass	$5.00	$4.00	-$1.00	-20%
All	All	Event Pass	$4.50	$4.00	-$0.50	-11%
Adult	Peak	All Day Pass	$5.00	$4.00	-$1.00	-20%
Youth/Senior	Peak	All Day Pass	$5.00	$2.00	-$3.00	-60%

End of Fare-Free Pilot

FTA requires transit providers to conduct a Title VI fare equity analysis for any proposed fare change lasting longer than six months. Thus, a fare equity analysis was completed in advance of the 18-month pilot, and a second fare equity analysis is required with the end of the pilot and the return to the existing fare structure.

Table 2. End Fare-Free Pilot: Fare Comparison for Route 32 and 62

Fare Type	Fare Set	Fare Product	Pilot Fare	Existing Fare
Adult	Local Bus Peak	Cash, Stored Value, Token, Coupon	$0	$2.50
Adult	Local Bus Off-Peak	Cash, Stored Value, Token, Coupon	$0	$2.00
Youth/Senior	Local Bus Peak	Cash, Stored Value, Token, Coupon	$0	$2.50
Youth/Senior	Local Bus Off-Peak	Cash, Stored Value, Token, Coupon	$0	$1.00
Mobility Fare	Local Bus (All Hours)	Cash, Stored Value, Token, Coupon	$0	$1.00

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 October 2022.

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. The analyses in this report fulfill this requirement for fare changes planned to commence in January 2025.

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 **"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*, October 2022, https://metrocouncil.org/About-Us/Publications-And-Resources/EQUAL-OPPORTUNITY-DOCUMENTS/TITLE-VI-DOCUMENTS/Title-VI-Compliance-and-Implementation-Plan.aspx.

[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 "90 percent rule", which states that there may be evidence of disparate impact if:

- *Benefits* are being provided to BIPOC (minority) populations at a rate less than 90 percent of the benefits being provided to white populations, or
- *Adverse effects* are being borne by white populations (non-minority) at a rate less than 90 percent 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 90 percent rule represents a modification of Metro Transit's previous practice, which drew on the 80 percent rule originating in employment law.[14] The percentage threshold 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.

The most recent Title VI Program update changed the threshold of disparate impact and disproportionate burden from 80 to 90 percent in order to further Metro Transit's equity goals. Metro Transit's decision to use the 90 percent 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 2022. 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

The proposed fare changes evaluated in this report would simplify the regional fare structure and decrease fares slightly for the average rider of the regional Local Bus / METRO transit system.

In this analysis, if the quantitative results indicate that the percent decrease in the average fare for BIPOC (minority) riders is less than 90 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.

Policies Applied to End of Fare-Free Pilot on Routes 32/62

The end of the fare-free pilot will increase fares for riders of Route 32 and Route 62. In this analysis, if the quantitative results indicate that the average post-pilot fare paid by white riders on these routes is less than 90 percent of the average fare for BIPOC riders, this could be evidence of a disparate

[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*, October 2022, https://metrocouncil.org/About-Us/Publications-And-Resources/EQUAL-OPPORTUNITY-DOCUMENTS/TITLE-VI-DOCUMENTS/Title-VI-Compliance-and-Implementation-Plan.aspx.

impact. Similarly, if the average fare paid by non-low-income riders is less than 90 percent of the fare paid by low-income riders, there is potential for disproportionate burden on low-income riders.

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. 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 requires 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 uses 185 percent of the HHS poverty guidelines for the year 2022 (matching the period represented by on-board survey data, explained in the following chapter). The Metropolitan Council uses 185 percent of the HHS poverty guidelines 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 the 2022 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 an 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. 2022 Department of Health and Human Services Poverty Guidelines in Dollars

Size of Family Unit	100% Poverty Guideline ($)	185% Poverty Guideline ($)
1	$13,590	$25,142
2	$18,310	$33,874
3	$23,030	$42,606
4	$27,750	$51,338
5	$32,470	$60,070
6	$37,190	$68,802
7	$41,910	$77,534
8	$46,630	$86,266
9	$51,350	$94,998
10	$56,070	$103,730
For each additional person add	$4,720	$8,732

Source: https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines

CHAPTER 4: ANALYSIS METHODOLOGY

Process

This fare equity analysis for fare simplification was completed using the following three-step process:

1. Identify user demographics for each unique fare combination.
2. Calculate average fare for each demographic group under existing conditions and under proposed fare changes.
3. Compare changes in average fare between two demographic pair groups and apply Title VI policies to determine potential for disparate impact or disproportionate burden.

The process was applied first at a high level, using single base fares as a proxy for all fare types. It was then completed again using a more detailed breakout of fare media by route.

The process followed for the end of the fare-free pilot on Routes 32/62 was almost identical. However, because it is not possible to calculate a percent change from $0, the comparison made was between the average fares paid by different demographic groups on those routes after the return to the existing fare structure.

Data Sources

Transit rider demographics were gathered from the Travel Behavior Inventory (TBI) 2022 Transit On Board Survey.[18] The TBI is a comprehensive survey conducted every five 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 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. The TBI on board survey is thus 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.

The 2022 TBI on board survey questionnaire did not ask passengers what fare media they had used on their trips. Therefore, an initial high-level analysis was completed by assuming all riders used the single base fares applicable to their fare type. A second analysis incorporated fare medium data available in Metro Transit farebox records from April to December 2023. Both approaches will be detailed below.

[18] Metropolitan Council, *Travel Behavior Inventory (TBI) 2022 On Board Survey*, https://gisdata.mn.gov/dataset/us-mn-state-metc-society-tbi-transit-onboard2022.

Cleaning Survey Data

The data in the TBI on board survey were collected from April to December 2022, using a weighted random sample by ridership by line. Survey documents were made available in multiple languages, including English, Spanish, Hmong, and Somali. The survey results include detailed transit trip (origin to destination) records for about 133,000 transit trips across all providers and regional regular routes. 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

Purpose	Variable	Possible Values*
Demographic	Race/Ethnicity**	American Indian or Alaskan Native, Asian, Black or African American, Hispanic or Latino, Native Hawaiian or Pacific Islander, White, Other
Demographic	Total Annual Household Income	Less than $15,000, $15,000-$24,999, $25,000-$34,999, $35,000-$59,999, $60,000-$99,999, $100,000-$149,999, $150,000-$199,999, $200,000 or more, Not provided
Demographic	Household Size	1, 2, 3, 4, 5, 6, 7, 8, 9, 10+
Fare Type	Disability Status	Yes, No, Don't Know/Refuse
Fare Type	Age	Under 5, 5-15, 16-17, 18-24, 25-34, 35-44, 45-54, 55-64, 65-74, 75 and over, Prefer not to answer, Other, Refused/No Answer
Service	Surveyed Route	Any transit route offered in 2022 by Metro Transit, MTS, UMN, MVTA, Southwest Transit, Plymouth Metrolink, or Maple Grove
Service	Time Period	Before 6:00 am, 6:00 am - 7:00 am, 7:00 am -8:00 am, 8:00 am - 9:00 am, 9:01 am - 10:00 am, 10:00 am - 11:00 am, 11:00 am - 12:00 pm, 12:00 pm - 1:00 pm, 1:00 pm - 2:00 pm, 3:01 pm - 4:00 pm, 4:00 pm - 5:00 pm, 5:00 pm - 6:00 pm, 6:00 pm - 6:30 pm, 6:31 pm - 7:00 pm, 7:00 pm - 8:00 pm, 8:00 pm - 9:00 pm, After 9:00 pm, Other, Refused/No Answer

*As reported in TBI results
**Respondents were allowed to select multiple race/ethnicity categories; those who chose to do so were considered BIPOC for the purposes of this analysis

Assigning Low-Income Status

The identification of low-income riders was based on a combination of self-reported household size and household income. TBI on board survey respondents were asked to report their total annual household income based on a series of income brackets, each with a range of at least $10,000 (as shown in Table 4). These income brackets do not correspond exactly to the HHS poverty guidelines shown earlier in Table 3.

Thus, for this fare equity analysis, the low point of each income bracket was used to represent a survey respondent's household income; this, in combination with reported household size, was then compared to the HHS poverty guidelines to determine whether or not the respondent would be assigned low-income or non-low-income status.

Table 5 shows whether or not survey respondents were considered low-income – as indicated by "LI" in the table – or non-low-income, based on their reported income bracket and household size.

Table 5. Identification of Low-Income Riders for Analysis

Based on low point of reported total annual household income range and reported household size in on board survey. Table cells with "LI" indicate that that combination of household income and household size was designated low-income.

Reported Total Annual Household Income Range from TBI	1	2	3	4	5	6	7	8	9	10
Less than $15,000	LI	LI	LI	LI	LI	LI	LI	LI	LI	LI
$15,000 - $24,999	LI	LI	LI	LI	LI	LI	LI	LI	LI	LI
$25,000 - $34,999	LI	LI	LI	LI	LI	LI	LI	LI	LI	LI
$35,000 - $59,999	--	--	LI	LI	LI	LI	LI	LI	LI	LI
$60,000 - $99,999	--	--	--	--	LI	LI	LI	LI	LI	LI
$100,000 - $149,999	--	--	--	--	--	--	--	--	--	LI
$150,000 - $199,999	--	--	--	--	--	--	--	--	--	--
$200,000 or more	--	--	--	--	--	--	--	--	--	--

Assigning Fare Type

As the 2022 On Board Survey did not ask what fare each respondent used, responses to certain demographic questions were used as proxies. Anyone whose response to the age question was 65+ or between 5 and 16 was assumed to be using a Youth/Senior fare type. Ages between 26 and 65 were assumed to be Adult. Anyone who answered "yes" when asked if they had a disability was assumed to be using the Mobility fare.

Excluded Survey Records

TBI on board survey records with one or more of the following characteristics were excluded from the analysis:

- Did not report age (excluded from all analysis)
- Child under 5 (excluded from all analysis)
- Did not report income and/or household size (excluded from low-income analysis)
- Did not report race/ethnicity (excluded from BIPOC analysis)

Cleaning Farebox Data

The second-stage analysis used Metro Transit farebox records for local buses from April to December 2023. Data from 2023 were used instead of 2022 data (consistent with TBI on board survey data) because 2022 farebox data were not available at the time of analysis. Because fareboxes do not log each individual fare medium individually, but rather lump them into broader categories, some data manipulation was necessary to arrive at estimated fares for the farebox data. In addition, because farebox data are not available for BRT and light rail routes, farebox data from the high-frequency network were isolated and used as proxies for these service types.

Combining Data Sources

Neither TBI on board survey nor farebox data contain all of the information typically included in fare equity analyses. TBI on board survey data include rider demographics but lack fare media information while farebox data include fare media details but lack demographic information. In order to obtain a more complete picture of demographics by fare medium and thus establish a more comprehensive idea of proposed fare change implications (particularly changes to pass programs), the datasets were combined for the secondary analysis.

Both TBI on board survey and farebox data contain transit route information. This common attribute allowed the datasets to be joined on a route-by-route basis. The goal of this join was to determine the percentage of BIPOC versus white riders using each individual fare medium (and similarly low-income versus non-low-income usage). In joining the datasets, this analysis acknowledged that not every fare medium would be available to every rider, such as Youth/Senior fares for riders in the "Under 5", "5-15", "65-74", and "75 and over" TBI on board survey categories. Multi-trip passes with no explicit fare group restrictions, such as the 31-day pass, were assumed to be available to all riders and so were distributed across fare groups according to their share of total rides. A list of fare media and their eligible TBI on board survey records is shown in Table 6.

Table 6. Fare Media Assignments by TBI On Board Survey Records

Fare Medium	TBI On Board Survey Records
Metropass	Disability Status: No or Don't Know/Refuse
Single Payment	Disability Status: No or Don't Know/Refuse Age Groups: 16-17, 18-24, 25-34, 35-44, 45-54, 55-64
UMN Student	Disability Status: No or Don't Know/Refuse
College Pass	Disability Status: No or Don't Know/Refuse
1 & 7 Day Pass	Disability Status: No or Don't Know/Refuse
31 Day Pass	Disability Status: No or Don't Know/Refuse
Youth Senior Single Payment	Disability Status: No or Don't Know/Refuse Age Groups: Under 5, 5-15, 65-74, and 75 and over
Youth Senior 10-Ride	Disability Status: No or Don't Know/Refuse Age Groups: Under 5, 5-15, 65-74, and 75 and over
Student Pass	Disability Status: No or Don't Know/Refuse Age Groups: Under 5, 5-15, 65-74, and 75 and over
Mobility Fare	Disability Status: Yes
Adult 10-Ride	Disability Status: No or Don't Know/Refuse Age Groups: 16-17, 18-24, 25-34, 35-44, 45-54, 55-64

The result of applying these fare media to TBI on board survey responses is a set of tables estimating the number of rides by fare type, fare medium, and BIPOC/low-income status for each route. An example is shown in Table 7 for Route 2 riders in the Adult fare type. Table 7 shows that among riders

using an Adult single payment fare, about 896 identify as BIPOC and 496 identify as white. These calculations were completed for every route and fare type to complete the estimation of demographics by fare medium.

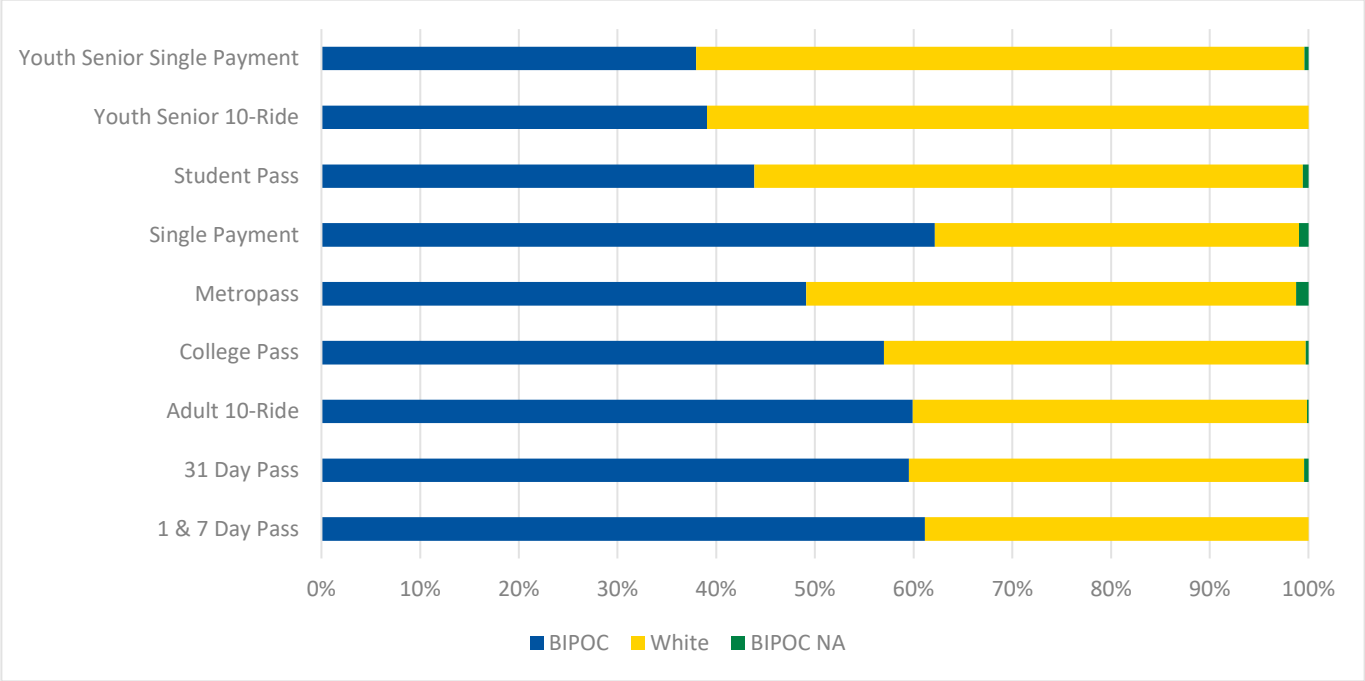
Table 7. Estimated Route 2 Adult Riders by Fare Medium, BIPOC, and Low-Income Status

Fare Type	Fare Medium	Total Fare Payments	% of Group Total	BIPOC On Board Survey Riders	White On Board Survey Riders	Race N/A On Board Survey Riders	Low-Income On Board Survey Riders	Non-Low-Income On Board Survey Riders	Income N/A On Board Survey Riders	Total On Board Survey Riders*
Adult	Metropass	22,076	4.4%	75	41	1	74	20	24	118
Adult	Single Payment	264,698	53.2%	896	496	17	885	239	286	1,409
Adult	UMN Student	182,141	36.6%	617	341	12	609	164	197	970
Adult	College Pass	1,805	0.4%	6	3	0	6	2	2	10
Adult	1 & 7 Day Pass	1,771	0.4%	6	3	0	6	2	2	9
Adult	31 Day Pass	21,587	4.3%	73	40	1	72	19	23	115
Adult	Adult 10-Ride	3,586	0.7%	12	7	0	12	3	4	19
Adult	Total	497,664	100%	1,685	932	32	1,664	449	537	2,650

*Totals may vary slightly from sum of adjacent rows due to rounding

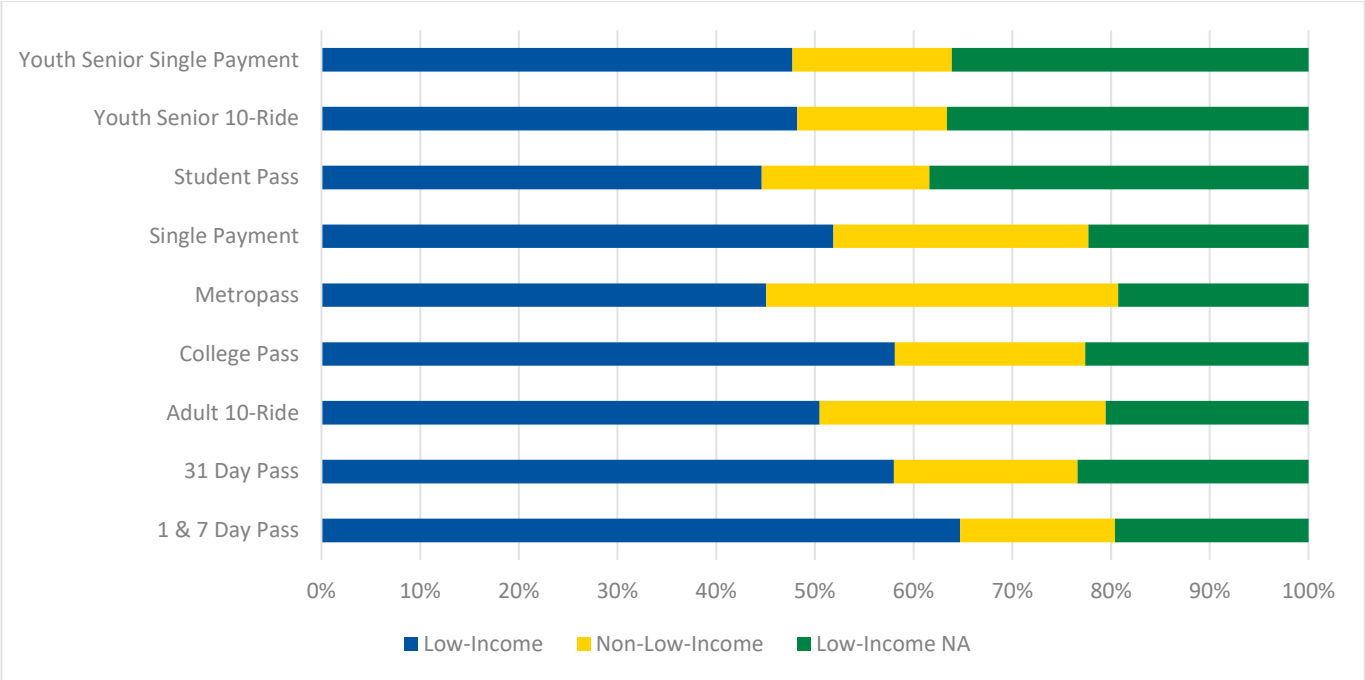
The systemwide distribution of BIPOC versus white riders by fare medium is shown in Figure 3. In the fare medium categories for which price changes are proposed, usage generally ranges between 40 percent and 60 percent BIPOC. The highest percentage of BIPOC ridership is seen in the (Adult) Single Payment category. With fare media identified, a more complete representation of average fares paid before and after the proposed changes is available.

Figure 3. Fare Media by Race and Ethnicity Status



Similarly, Figure 4 shows the systemwide distribution of fare media among low-income and non-low-income riders. Although a substantial number of respondents could not be assigned an income status on the basis of their answers ("Low-Income NA"), among those who remain, the breakdown is similar to Figure 3, with about 40 percent to 60 percent of each fare medium used by low-income riders. The largest share of low-income riders is seen in the 1 & 7 Day Pass category.

Figure 4. Fare Media by Income Status



CHAPTER 5: EVALUATION OF IMPACTS FROM FARE SIMPLIFICATION

Proposed Changes

As detailed earlier, the proposed fare simplification includes the following components listed below.

- Eliminate the rush-hour surcharge for all riders on Local Bus / METRO service, resulting in:
  - Flat $1.00 single fare for the Youth/Senior fare type
  - Flat $2.00 all-day pass for the Youth/Senior fare type
  - Flat $2.00 single fare for the Adult fare type
  - Flat $4.00 all-day pass for the Adult fare type
- Lower the Adult 10-Ride Pass from $20.50 to $18
- Restructure other passes for all users:
  - Eliminate $90 31-Day pass
  - Lower 7-Day pass from $24 to $20
  - Lower Metropass from $83 to $75 per month
  - Lower College Pass from $165 to $152 per semester
  - Lower Student Pass from $97 to $90 per quarter
  - Lower Event Pass from $4.50 to $4.00

The impacts of this fare change were analyzed using two different methods. The first method was a high-level, global analysis completed using standard fare equity analysis data sources (TBI on board survey). The second method used farebox data to calculate fare changes based on fare medium and route. Because both methods have benefits and limitations, the results of both are presented here.

High-Level Analysis

The high-level analysis was completed before farebox data was available. It includes the following features:

- All riders are assumed to pay single fares using cash or cash equivalents.
- Demographic profiles and average fare are calculated for the Local Bus / METRO network as a whole, not by route.

Step 1: Create Demographic Profiles by Fare Type and Time of Day

Developing Unique Fare Combinations

To meet the needs of the fare equity analysis, each local/METRO trip needed to be categorized by its fare type, time of day (peak or off-peak), whether the rider was BIPOC, and whether the rider was low-income. This resulted in the list of possible fare combinations shown in Table 8 with the average weekday ridership for each combination. Note that non-responses to the demographic questions are included as their own categories (BIPOC NA and Income NA). These non-response categories are included in interim steps, charts, and tables as a best practice in transparency, but they are not used in the final equity analysis.

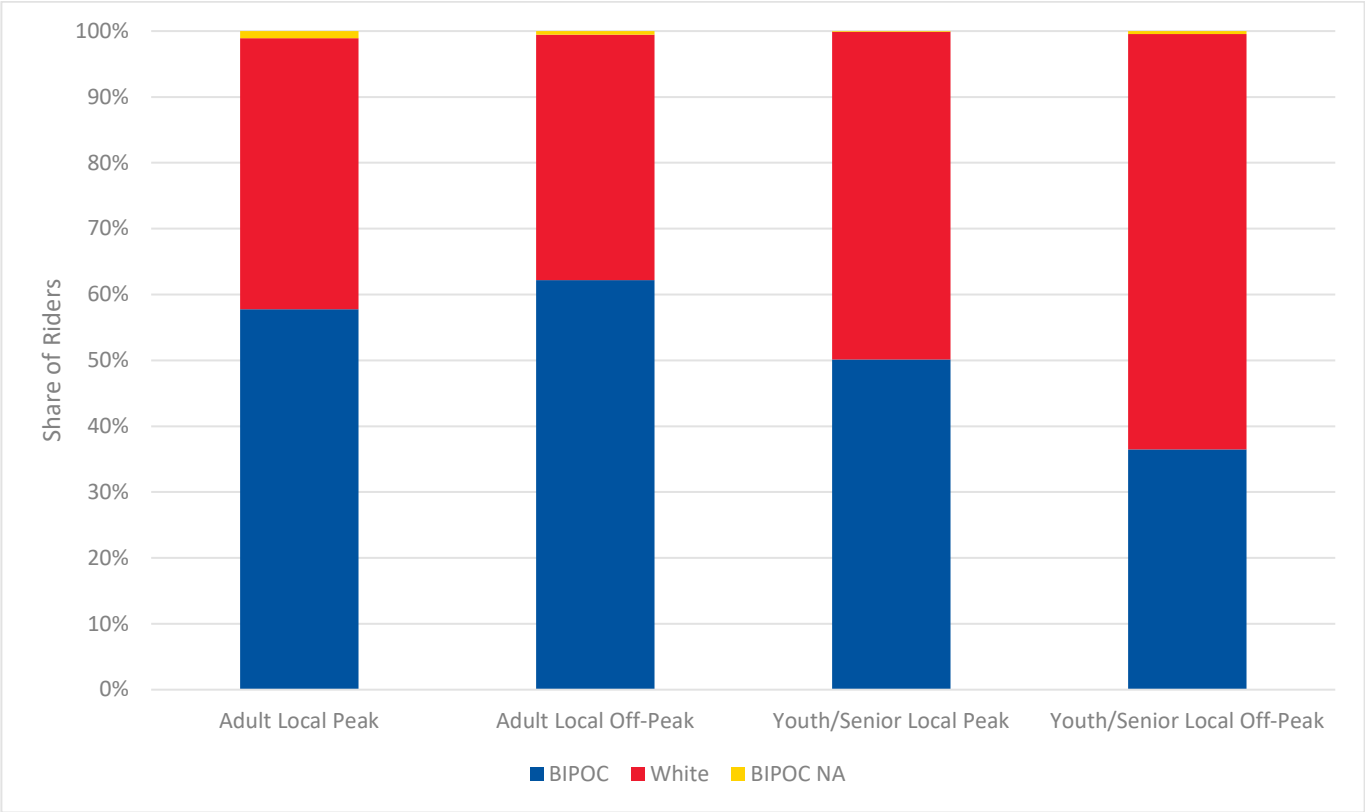
Table 8. Fare Combinations with Average Weekday Ridership

Fare Type	Time of Day	BIPOC NA	BIPOC	White	Income NA	Non-Low-Income	Low-Income
Adult	Off-Peak	250	25,342	15,258	9,528	9,834	21,488
Adult	Peak	426	22,197	16,134	9,290	11,487	17,981
Youth/Senior	Off-Peak	24	961	1,671	953	446	1,257
Youth/Senior	Peak	2	1,132	1,208	841	464	1,036
Children Under 5	Off-Peak	0	17	0	0	0	17
Age Did Not Respond	Off-Peak	289	112	25	388	25	12
Age Did Not Respond	Peak	105	137	97	305	19	14

Rider Profiles

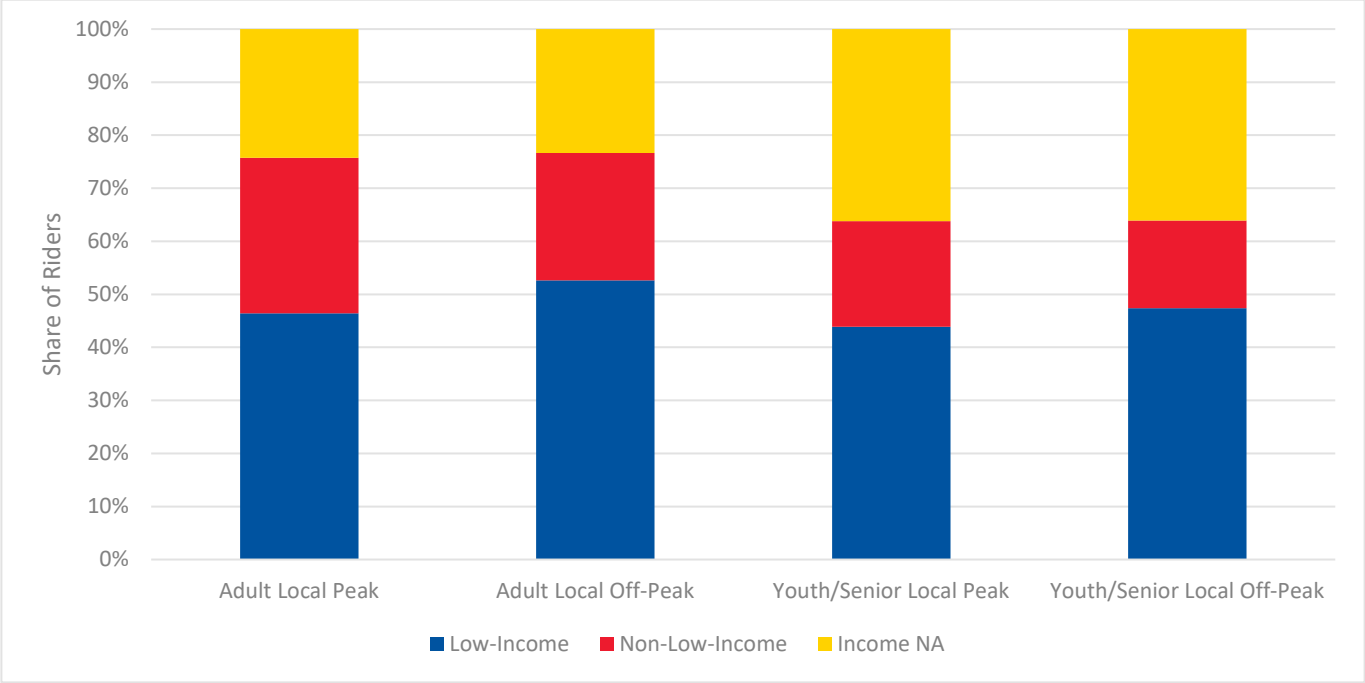
Rider profiles by race and ethnicity status are shown in Figure 5. BIPOC riders represent more than half of peak period riders. This indicates that BIPOC riders will receive a significant portion of the benefit of the proposed reduction in peak fares. Only 1.3 percent of survey respondents did not provide race information.

Figure 5. Demographic Profile - BIPOC



Rider profiles by low-income status are shown in Figure 6. Low-income riders represent 65 percent of survey respondents reporting income and household size. A significant portion of riders declined to provide their household income or household size (24.3 percent). These records were excluded from the analysis.

Figure 6. Demographic Profile - Low-Income



Step 2: Calculate Average Fare Weighted by Ridership for Demographic Groups Before and After Fare Change

The average fare for each demographic group was calculated by weighting each fare by the number of linked trips taken by the target demographic. For example, the average existing fare paid by BIPOC riders was calculated by multiplying the Adult Peak fare ($2.50) by the number of BIPOC riders using it on an average weekday per Table 8 (22,197), doing the same for all other relevant fare types, summing the results, and dividing that sum by the total number of trips taken by BIPOC riders.

This process was completed individually for each of five demographic groups: All riders, BIPOC, non-BIPOC, low-income, and non-low-income.

Step 3: Compare Changes in Average Fare and Apply Title VI Policies

To calculate the percent change in fare by group, the difference between the existing and proposed average fare was divided by the existing average fare. This resulted in a percent change in fare for each of the five demographic groups. The percentage change was then compared between BIPOC and non-BIPOC riders and between low-income and non-low-income riders.

Applying Metro Transit's existing disparate impact policy (see the Discrimination, Disparate Impact, and Disproportionate Burden section of Chapter 3: Title VI Principles and Definitions), 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 0.90 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 9, on average, BIPOC riders would experience 10.1 percent lower fares under proposed fare changes compared to existing fares. This fare decrease is greater than that for the average white rider, who would experience a 9.9 percent decrease in fares. The resulting comparison

index is 1.02. Therefore, per Metro Transit Title VI policies, this analysis identified **no potential for disparate impact** as a result of the proposed fare changes.

On average, low-income riders would experience a reduction of 9.5 percent under proposed fare changes compared to existing fares. This fare decrease is greater than that for the average non-low-income rider, who would experience a 9.5 percent reduction. The resulting comparison index is 1.00. Therefore, per Metro Transit Title VI policies, this analysis identified **no potential for disproportionate burden** as a result of the proposed fare changes.

Table 9. Average Change in Fare Comparison - Fare Simplification High-Level Analysis

	All Riders	BIPOC Riders	White Riders	Low-Income	Non-Low-Income
Total Riders	107,463	60,767	45,273	53,121	28,217
Weighted Average Fare Before	$2.10	$2.08	$2.12	$2.00	$2.32
Weighted Average Fare After	$1.89	$1.87	$1.91	$1.81	$2.10
Percent Change	-10.0%	-10.1%	-9.9%	-9.5%	-9.5%
Comparison Index		**1.02**		**1.00**	

Fare Media Analysis

The fare media analysis was completed using farebox data to evaluate differences in per trip costs among different fare media before and after fare simplification. It includes the following features:

- Trip counts by fare payment method are used.
- Demographic profiles and average fare are calculated on a route-by-route basis, not across all routes.

Step 1: Estimate Distribution of Discrete Fare Media Across Demographic Profiles

In order to incorporate the varying per-trip costs of different fare media, a more detailed table of unique fare combinations was developed by fare medium, fare type, and demographic from the combined TBI on board survey data and farebox data described in the Combining Data Sources section of Chapter 4: Analysis Methodology.

The analysis detailed for Adult fare Route 2 riders in Table 7 was repeated for all fare types and routes throughout the system. The results were then summarized by demographic group.

Step 2: Calculate Weighted Average Fares Before and After Change

Once the estimated number of riders by fare medium and BIPOC and low-income status was determined, a weighted average fare before and after the proposed changes was calculated by BIPOC and low-income status. For example, the number of BIPOC riders using Adult single fare payment was multiplied by $2.50 in the before scenario and $2.00 in the after scenario, and so on for all other current and proposed fare types. For pass fare types, assumptions about average usage were required in order to estimate the cost of a single ride. These assumptions are detailed in Appendix A: Fare Changes in Detail.

Summing the products of BIPOC riders and their fare costs, then dividing by the total number of trips taken by BIPOC riders, gave the weighted average fare paid by a BIPOC rider before and after the proposed changes. This process was completed for BIPOC, white, low-income, and non-low-income riders, with non-responses excluded from the overall totals.

Step 3: Compare Changes and Apply Title VI Policies

Table 10 shows the average fare per trip under the existing and proposed fare structures for all riders, BIPOC riders, white riders, low-income riders, and non-low-income riders.

Table 10. Average Fare per Trip by Demographic Group – Fare Media Analysis

	All Riders	BIPOC Riders	White Riders	Low-Income	Non-Low-Income
Total Riders	147,230	43,754	30,440	38,443	17,427
Weighted Average Before	$1.88	$1.93	$1.80	$1.84	$1.96
Weighted Average After	$1.53	$1.58	$1.46	$1.51	$1.60
Percent Change	-18.6%	-18.1%	-18.9%	-17.9%	-18.4%
Comparison Index		**0.96**		**0.97**	

On average, BIPOC riders would experience an 18.1 percent reduction under proposed fare changes compared to existing fares. This fare decrease is slightly less than that for the average white rider, who would experience an 18.9 percent reduction. The resulting comparison index is 0.96, which does not cross the threshold established by the 90 percent rule for disparate impacts. Therefore, per Metro Transit Title VI policies, this analysis identified **no potential for disparate impact** as a result of the proposed fare changes.

On average, low-income riders would experience a fare reduction of 17.9 percent under proposed fare changes compared to existing fares. This fare decrease is slightly less than that for the average non-low-income rider, who would experience an 18.4 percent reduction. The resulting comparison index is 0.97. Therefore, per Metro Transit Title VI policies, this analysis identified **no potential for disproportionate burden** as a result of the proposed fare changes.

CHAPTER 6: EVALUATION OF IMPACTS FROM END OF ROUTES 32/62 PILOT

As detailed earlier, Metro Transit is analyzing the return to existing fares when an 18-month fare-free pilot on Routes 32 and 62 ends on December 31, 2024. This will entail a return to the existing fare structure of riders of those routes, including:

- Adult fare: $2.50 peak, $2.00 off-peak
- Youth/Senior fare: $2.50 peak, $1.00 off-peak
- Mobility fare: $1.00

Similarly to the fare simplification proposal, two separate analyses were conducted: a high-level analysis using only TBI data, and a more detailed analysis incorporating farebox data.

High-Level Analysis

Step 1: Identify User Demographics for Each Unique Fare Combination

The high-level analysis for Routes 32/62 began with the same step as the high-level analysis for the fare simplification; the only difference was that the average weekday ridership for each fare combination was calculated using only survey responses from those two routes. The resulting demographic profile is shown in Figure 7 (ridership by BIPOC status) and Figure 8 (income status).

Figure 7. Demographic Profile of Routes 32/62 - BIPOC

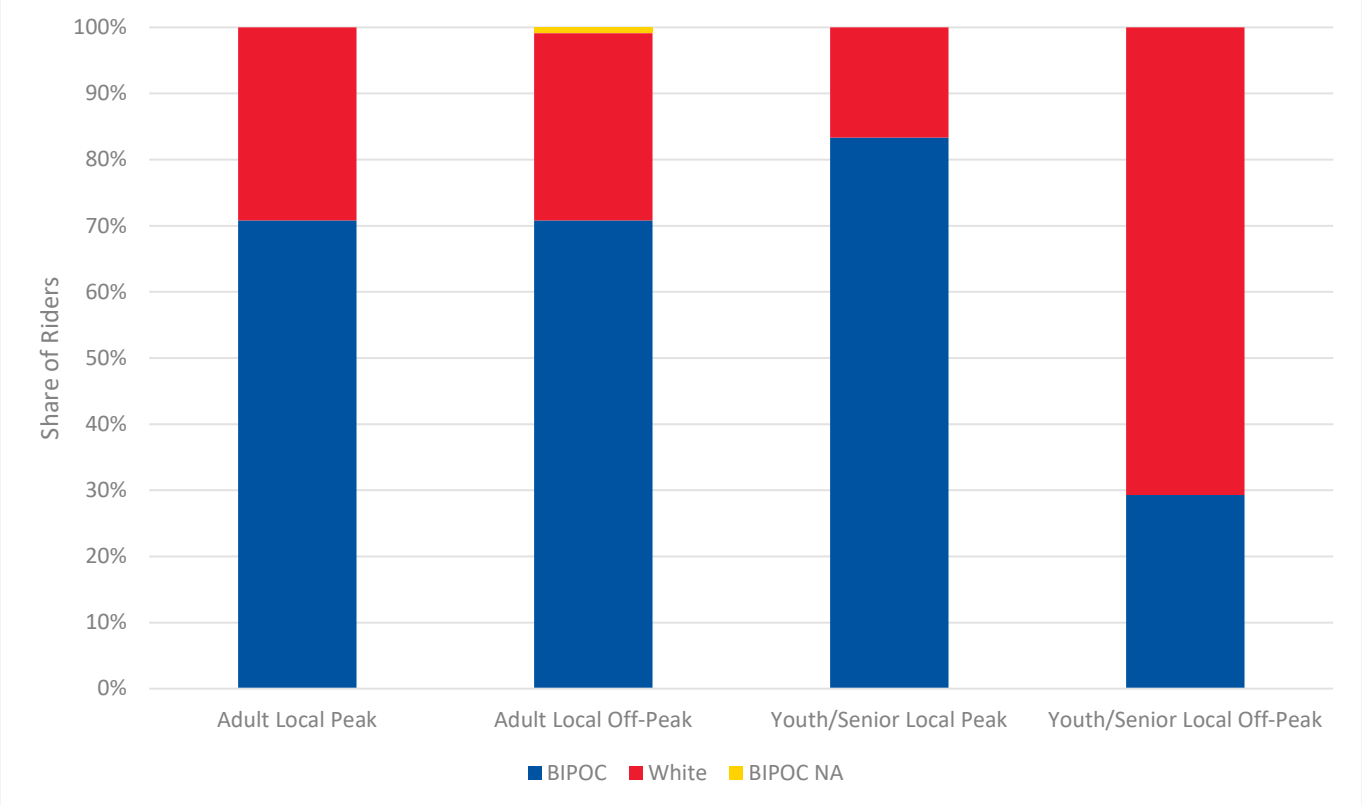
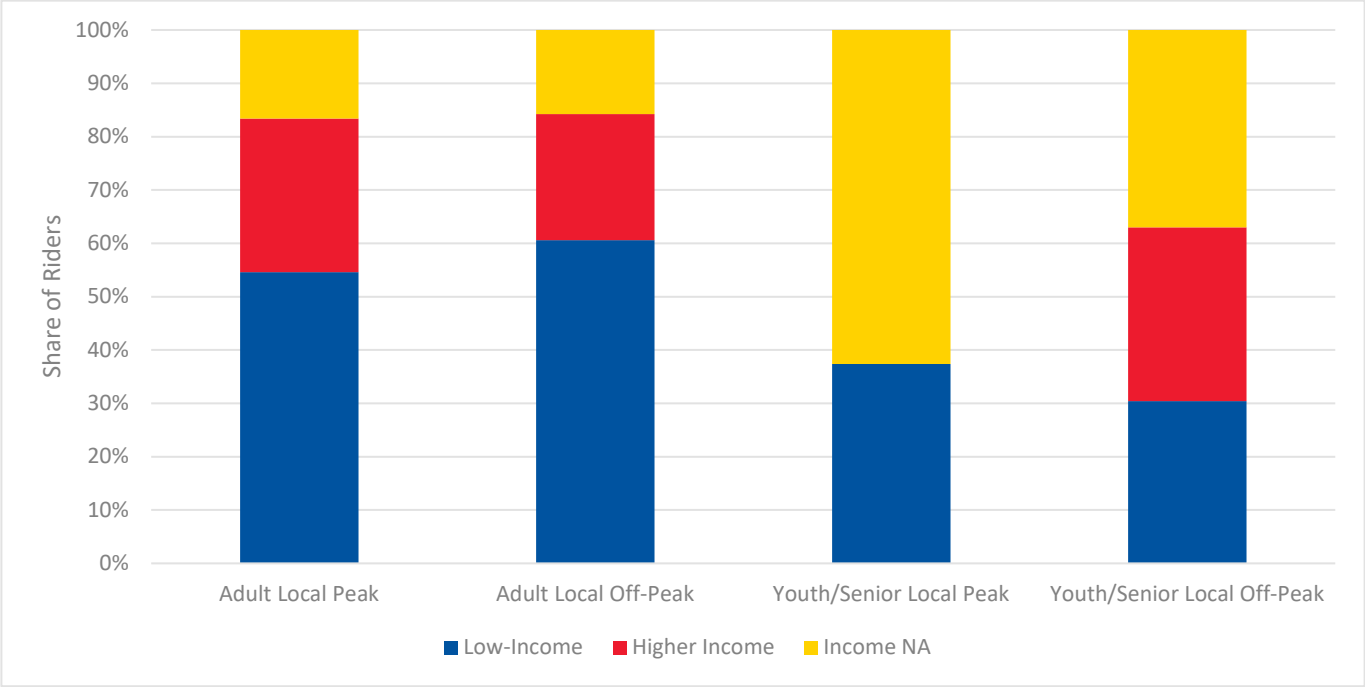


Figure 8. Demographic Profile of Routes 32/62 - Income



On Routes 32/62, Adult ridership is about 70 percent BIPOC in both peak and off-peak periods. Youth/Senior ridership shows much sharper distinctions by time of day; more than 80 percent of Youth/Senior riders in the peak period are BIPOC, but fewer than 30 percent of Youth/Senior riders in the off-peak are BIPOC.

Income categories show similar patterns. Adult peak and off-peak are each approximately 50-60 percent low-income, but Youth/Senior off-peak riders are only 30 percent low-income. In the peak period, the majority of Youth/Senior riders (as defined using their responses to the age question) left blank the questions needed to establish their income status.

Step 2: Calculate Average Post-Pilot Fare for Each Demographic Group

The average fare for each demographic group was calculated by weighting each fare by the number of linked trips taken by the target demographic. For example, the average proposed fare paid by BIPOC riders was calculated by multiplying the proposed Adult fare ($2.00) by the number of BIPOC riders using it on an average weekday, doing the same for all other relevant fare types, summing the results, and dividing that sum by the total number of trips taken by BIPOC riders. This process was completed individually for each of five demographic groups: all riders, BIPOC, non-BIPOC, low-income, and non-low-income. As the current pilot charges no fare, no calculation was made for existing average fare.

Step 3: Compare Average Post-Pilot Fare Between Two Demographic Pair Groups and Apply Title VI Policies

The average fares for each demographic group, as well as the results of the Title VI equity analysis, are shown in Table 11. On average, white riders will pay $1.70 per ride, while BIPOC riders will pay slightly more at $1.80. The resulting comparison index is 0.94, which does not cross the threshold

established by the 90 percent rule for disparate impact. Therefore, per Metro Transit Title VI policies, this analysis identified **no potential for disparate impact** as a result of the proposed fare changes.

On average, low-income riders will pay an average fare of $1.76, while non-low-income riders will pay slightly more at $1.85. The resulting comparison index is 1.05. Therefore, per Metro Transit Title VI policies, this analysis identified **no potential for disproportionate burden** as a result of the proposed fare changes.

Table 11. Routes 32/62 Fare Comparison - High-Level Analysis

	All Riders	BIPOC Riders	White Riders	Low-Income	Non-Low-Income
Total Riders	2,133	1,458	675	1,249	513
Weighted Average Fare	$1.77	$1.80	$1.70	$1.76	$1.85
Comparison Index			**0.94**		**1.05**

Fare Media Analysis

A second analysis was completed using farebox data from Routes 32/62 to evaluate the proposed changes to different fare products. Similar to the analysis of fare simplification, it includes the following features:

- Trip counts by fare payment method are used.
- Demographic profiles and average fare are calculated on a route-by-route basis, not across all routes.

Step 1: Estimate Distribution of Discrete Fare Media Across Demographic Profiles

The methodology described in Chapter 4: Analysis Methodology combined route-level farebox records from April-December 2023 with TBI data from those routes. This allowed the ridership counts developed for unique fare media-time of day-demographic combinations to be isolated easily to Routes 32 and 62. Note that farebox records for Routes 32 and 62 are limited to the period from April to July 2023. The fare-free pilot began in July 2023 and thus no fares nor farebox data were collected.

Step 2: Calculate Average Post-Pilot Fare for Each Demographic Group

Once the estimated number of daily riders by fare medium and BIPOC/low-income status was determined, a weighted average fare was calculated by BIPOC/low-income status. For example, the number of BIPOC riders using Adult single fare payment during peak hours was multiplied by $2.50, the number of BIPOC riders using Adult single fare payment in the off-peak was multiplied by $2.00, and so on. Summing the results and dividing by the total number of trips taken by BIPOC riders gave the weighted average fare paid by a BIPOC rider on Routes 32 and 62 once the existing fare structure is restored. This process was completed for the five demographic groups: BIPOC, white, low-income, non-low-income, and all riders.

Step 3: Compare Average Post-Pilot Fare Between Two Demographic Pair Groups and Apply Title VI Policies

The average fares for each demographic group, as well as the results of the Title VI equity analysis, are shown in Table 12. By this analysis, white riders will pay an average of $1.58 per ride, while BIPOC riders will pay slightly more at $1.68. The average white rider will pay 94 percent of the fare paid by the average BIPOC rider. The resulting comparison index is 0.94. This does not cross the threshold established by the 90 percent rule for disparate impact. Therefore, per Metro Transit Title VI policies, this analysis identified **no potential for disparate impact** as a result of the proposed fare changes.

On average, low-income riders will pay an average fare of $1.64, while non-low-income riders will pay slightly more at $1.72. The resulting comparison index is 1.05 (non-low-income riders pay 105 percent of what low-income riders do, on average). Therefore, per Metro Transit Title VI policies, this analysis identified **no potential for disproportionate burden** as a result of the proposed fare changes.

Table 12. Routes 32/62 Fare Comparison – Fare Media Analysis

	All Riders	BIPOC Riders	White Riders	Low-Income	Non-Low-Income
Total Riders	2,133	1,435	673	1,249	513
Weighted Average Fare	$1.65	$1.68	$1.58	$1.64	$1.72
Comparison Index			**0.94**		**1.05**

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 Local Bus / METRO transit system. The proposed fare changes align with the Metropolitan Council's fare policy goals of balancing equity, fare simplification, and revenue generation.

Two analyses 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.

The two analyses, one of which used a high-level approach and one of which used a more detailed approach based on fare media distribution by route, arrived at the same conclusion:

- **no disparate impact** to BIPOC riders as a result of proposed fare changes, and
- **no disproportionate burden** on low-income riders as a result of proposed fare changes.

Metro Transit and the Metropolitan Council are also planning to conclude the 18-month fare-free pilot on Routes 32 and 62 at the end of 2024. Two analyses, similarly following high-level and fare medium-based methodologies, examined the equity impacts of the return to fare collection on these routes. Both analyses arrived at the same conclusion:

- **no disparate impact** to BIPOC riders as 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.

APPENDIX A: FARE CHANGES IN DETAIL

Fare Type	Fare Set	Fare Product	Current Price	Proposed Price	Current Cost per Ride	Proposed Cost per Ride	Assumptions
Adult (13 to 64)	Local Peak	Cash, Stored Value, Token, Coupon	$2.50	$2.00	$2.50	$2.00	N/A
Adult (13 to 64)	Local Off-Peak	Cash, Stored Value, Token, Coupon	$2.00	$2.00	$2.00	$2.00	No change to be evaluated
All Non-Mobility	Express Peak	Cash, Stored Value, Token, Coupon	$3.25	$3.25	$3.25	$3.25	No change to be evaluated
Adult (13 to 64)	Express Off-Peak	Cash, Stored Value, Token, Coupon	$2.50	$2.50	$2.50	$2.50	No change to be evaluated
Youth/Senior	Local Peak	Cash, Stored Value, Token, Coupon	$2.50	$1.00	$2.50	$1.00	N/A
Youth/Senior	Local Off-Peak	Cash, Stored Value, Token, Coupon	$1.00	$1.00	$1.00	$1.00	No change to be evaluated
Youth/Senior	Express Off-Peak	Cash, Stored Value, Token, Coupon	$1.00	$1.00	$1.00	$1.00	No change to be evaluated

Fare Type	Fare Set	Fare Product	Current Price	Proposed Price	Current Cost per Ride	Proposed Cost per Ride	Assumptions
Mobility	All	Cash, Stored Value, Token, Coupon	$1.00	$1.00	$1.00	$1.00	No change to be evaluated
All	All	7-Day Pass	$24.00	$20.00	$1.71	$1.43	Assumes 2 trips per day
All	All	31-Day Pass (Local Peak)	$90.00	Discontinued	$1.45	$1.43	Assumes 2 trips a day, with riders switching to 7-day pass after discontinuation
All	All	Metropass	$83.00	$75.00	$2.96	$2.68	Assumes 2 trips per business day
All	All	College Pass	$165.00	$152.00	$0.79	$0.73	Assumes 2 trips per business day over semester (104 business days)
All	All	Student and MPS Student Pass	$97.00	$90.00	$0.29	$0.27	2 rides per school day, 165 instructional days per school year
All	All	10-Ride Pass	$20.50	$18.00	$2.05	$1.80	N/A
All	All	Visitor Pass	$5.00	$4.00	$2.50	$2.00	2 rides per pass
All	All	Event Pass	$4.50	$4.00	$2.25	$2.00	2 rides per event
Adult (13 to 64)	Peak	All Day Pass	$5	$4	$2.50	$2.00	2 rides per pass
Youth/Senior	Peak	All Day Pass	$5	$2	$2.50	$1.00	2 rides per pass
Adult (13 to 64)	Off-Peak	All Day Pass	$4	$4	N/A	N/A	No change to be evaluated
Youth/Senior	Off-Peak	All Day Pass	$2	$2	N/A	N/A	No change to be evaluated

Committee Report

Transportation Committee

Committee meeting date: March 10, 2025 **For the Metropolitan Council:** March 26, 2025

Business Item: 2025-30

Discontinue Suspended Bus Routes and Endorse the Network Now Framework

Proposed action

That the Metropolitan Council approve the discontinuation of 50 bus routes as outlined in Network Now framework and endorse the Network Now framework.

Summary of Transportation Committee discussion/questions

Metro Transit Route Planning Manager Cyndi Harper and Planner Mark Christianson presented this item. Council Members asked for additional resources and commented on the route changes.

Motion by Carter, Toni, seconded by Cameron. Motion carried.

Business Item

Transportation Committee

Committee Meeting Date: March 10, 2025 **For the Metropolitan Council:** March 26, 2025

Business Item: 2025-30

Discontinue Suspended Bus Routes and Endorse the Network Now Framework

District(s), Member(s):	All
Policy/Legal Reference:	PIC 2-2 Accountability to the Public Policy; PIC 2-2e Public Involvement in Transportation Service Changes and Restructuring
Staff Prepared/Presented:	Lesley Kandaras, General Manager, 612-349-7513
	Adam Harrington, Director of Service Development, 612-349-7797
	Sophia Ginis, Director of Community Affairs, 612-349-3853
	Cyndi Harper, Manager of Route Planning, 612-349-7723
Division/Department:	Metro Transit

Proposed Action

That the Metropolitan Council approve the discontinuation of 50 bus routes as outlined in Network Now framework and endorse the Network Now framework.

Background

Network Now is a vision for transit service that best meets the needs of our region through 2027. The framework represents the region's top priorities for transit as represented in over 8,000 comments over multiple years, coupled with policy guidance, and technical evaluation.

Through the Network Now framework, Metro Transit investments will:

- Expand transit service by more than 40% to help attract more riders.
- Improve access by providing new bus routes and Metro micro service.
- Modify commuter and express service to meet today's travel patterns.

This investment includes:

- Frequency improvements to 70+ routes.
- High frequency service every 15 minutes or better for 26 routes.
- LRT service will return to 10-minute frequency.
- Creation of eight new micro zones.
- Restoration of 12 suspended routes
- 15-minute service during rush hours and hourly midday service for five key commuter express routes.
- Weekday frequency of every 30 minutes or better for most suburban routes.

These investments will yield a 27% increase in access to jobs per resident in the region, on average.

Metro Transit will officially discontinue 50 routes, and the resources will be reinvested into the transit network. Most of the discontinued routes have been suspended since 2020. Concurrently, 16 Park and Ride facilities associated with these suspended routes will also be closed. The travel patterns of traditional downtown office workers have changed significantly, resulting in lower transit demand, and many of these customers have vehicles available to reach other Park & Ride facilities.

Currently Suspended Routes to be Discontinued

- Local routes 12, 16, 19, 84, 415, 417, 547
- Commuter-oriented routes 53, 59, 111, 118, 129, 135, 141, 146, 261, 262, 263, 265, 272, 288, 350, 361, 364, 365, 375, 452, 552, 553, 554, 558, 588, 589, 643, 663, 664, 668, 670, 671, 677, 679, 756, 762, 767, 825, 831, 854, 865

Currently Operating Routes to be Discontinued

- Routes 501, 761

Rationale

The Network Now draft concept plan was the topic of significant public outreach and engagement efforts in fall 2024 and nearly 1,600 comments were received. Public input demonstrated support for investments in the METRO network and speed and reliability initiatives, emphasizing all-day service and route simplification, and express service that operates for more of the day. The most common requests included more frequency, late-night service, suburb-to-suburb routes and microtransit. The Network Now framework has been modified based on this feedback.

The changes and improvements align with expansion resulting from new transitways, revenues, expected workforce, and fleet projections.

Thrive Lens Analysis

The Council adopted Imagine 2050 on February 12, 2025, which builds on policy direction in Thrive MSP 2040. Under the Thrive lens, Network Now advances two of these outcomes.

Stewardship: Managing finite resources (including workforce) in a responsible way is necessary to equitably grow transit service and expand mobility within the region.

Equity: A Title VI Service Equity Analysis (SEA) was conducted to ensure the Network Now investments are made in an equitable way. Results indicate that there is no potential for disparate impacts to communities of color or disproportionate burden to low-income groups when reviewing the absolute change in weekly trips. The full SEA report is available online.

Funding

Transit service changes are supported by the existing operating budget.

Small Business Inclusion

There are no financial transactions, and therefore no small business inclusion, associated with this action.

Network Now Framework

Transportation Committee | March 10, 2025

Cyndi Harper, Manager | Service Development

Mark Christianson, Planner | Service Development

Network Now Framework 2025-2027 Service Improvements

Improves:

- New or redesigned routes
- Frequency or span improvements
- METRO line investments
- Microtransit

Resolves:

- Status of routes that are currently suspended (some since 2020)
- Facility closure needs

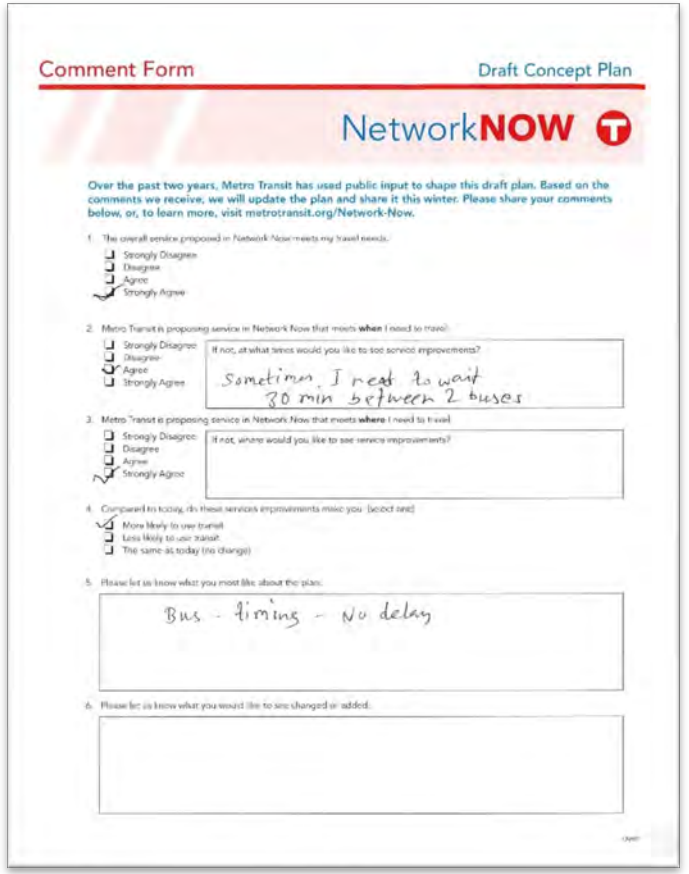
Builds upon data:

- **Performance**: details network performance, changes since 2019, and opportunities
- **Policy**: regional policy guidance from the Metropolitan Council applied
- **Engagement**: multiple rounds of engagement from values to specifics with nearly 8,000 comments

How we connected in 2024

- 25 community events
  - Includes events held primarily in other languages
- 35 municipal and county public briefings
- 15 committee and other presentations
- 420 hours of onboard and transit center intercept work with material handed to over 4,000 customers
- Rider alerts, interior cards, newsletters, social media, partner collaboration and more
- Nearly 1,600 comments were received





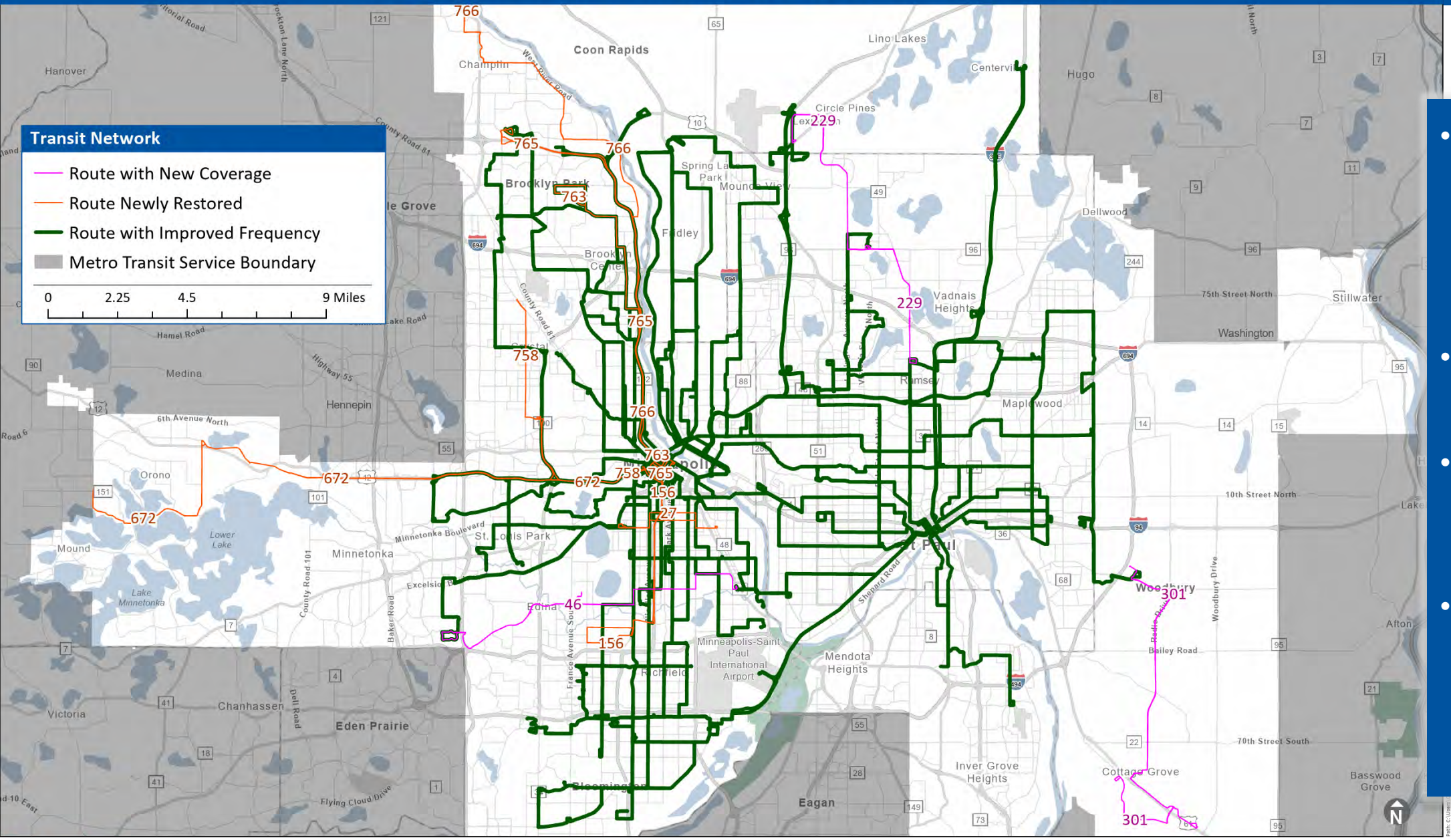
What we heard and what we changed (1 of 2)

Comments	Change	Specifics	Included
Support for investments in the METRO network	Added resources for the METRO network	• G Line Phase 2 added (2028) and related changes in Dakota County • Gold Line Extension 10-minute frequency, replaces Route 94 (2027)	☑
More frequency or hours of service	Added frequency and service related to themes requested	• More hours of high-frequency service on six routes • Six routes will start earlier in the morning/end later in the evening. • Saturday and/or Sunday frequency improvements on 11 routes	☑
Express routes with all day service	Improved mid-day frequency on express routes	• 15-minute service during rush hours and hourly midday service for five key commuter express routes	☑

What we heard and what we changed (2 of 2)

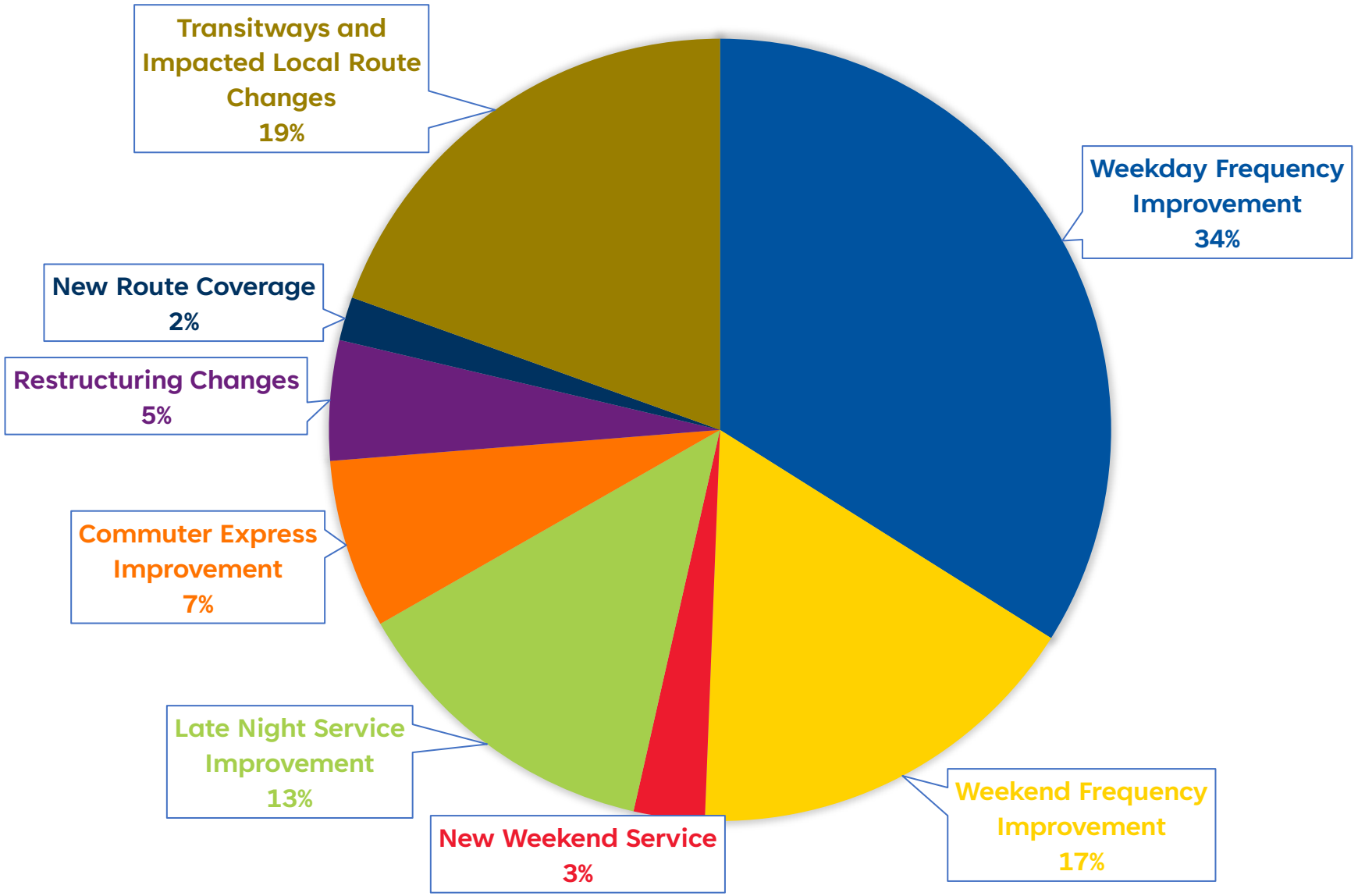
Comments	Change	Specifics	Included
More service later at night	Added service and increased frequency later in the evening	• Service after 1 a.m. on Routes 10, 18, C and D Lines • 30-minute service until last trip on high frequency routes	☑
Suburban to suburban connections	Added frequency and restored service	• Most suburban local routes operate every 30 minutes or better • All suburban local routes operate routes every 60 minutes or better	☑
Desired connections	Route restoration	• Restored routes 27, 156, 672, 758, 763, 765, and 766	☑
Route simplification	Removed branches / patterns	• Simpler structure of several routes	☑
More micro service	None	• We will continue to work with stakeholder in defining micro zones	

Changes from Network Now Plan to Framework



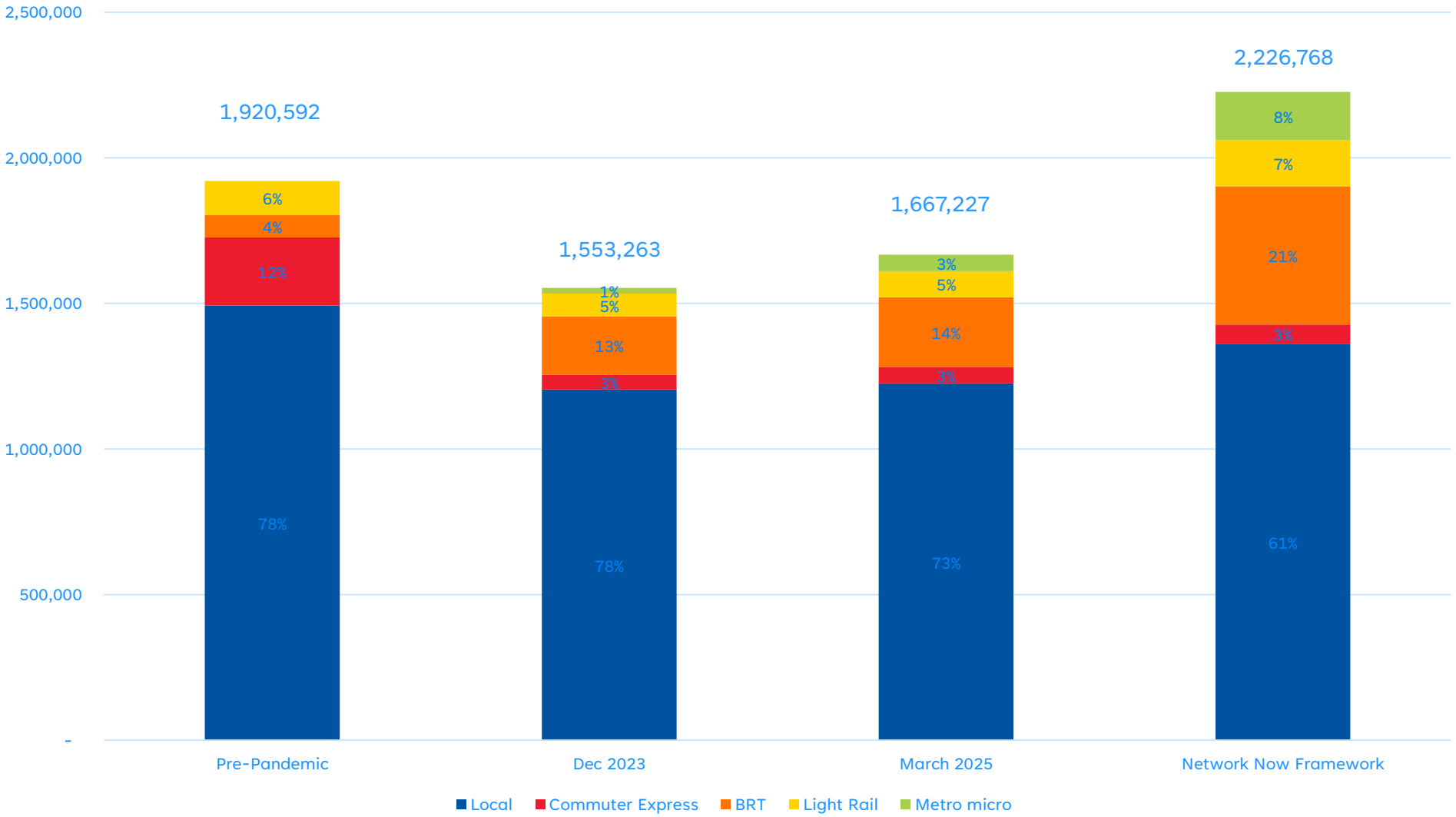
- 48 routes with improved frequency over the draft framework
- 7 routes restored
- 3 routes with significantly new coverage
- Service is expanded by addition 5% from the draft framework

FRAMEWORK ADDITIONS BY CATEGORY



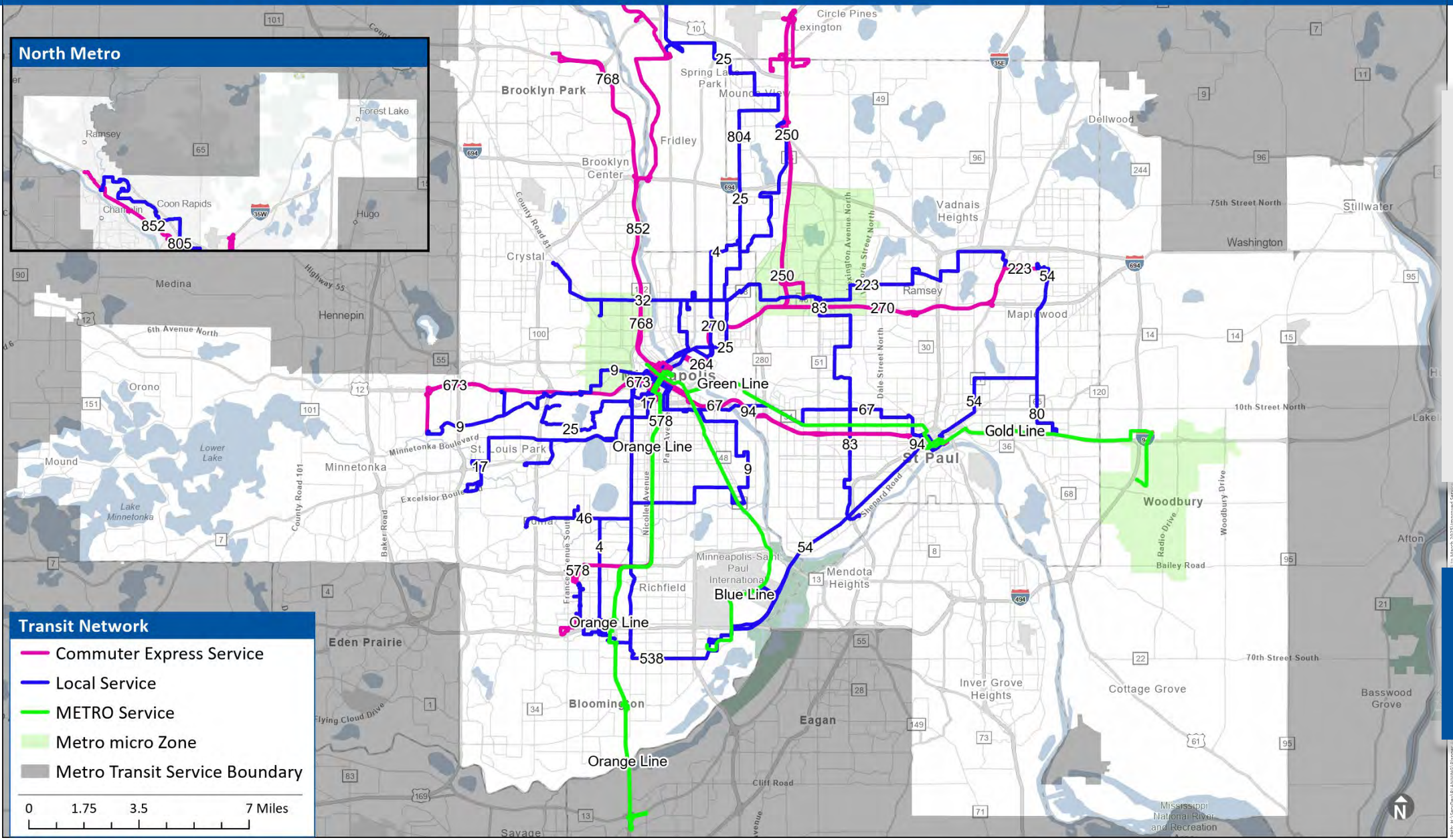
- 54% of Network Now framework additions are for improved frequency on weekdays and weekends on local routes
- 19% of changes are transitway or impacted local route changes
- 13% for late night service improvements
- 7% for new route coverage or restructuring
- 7% for commuter express improvements

In-Service Hour Changes: increase ~5% over Concept



- **Framework**
  40% increase from 2023
- **March 2025 Pick**
  7% increase from 2023

Routes Improved Baseline (Dec-23) to Current Network (Mar-25)

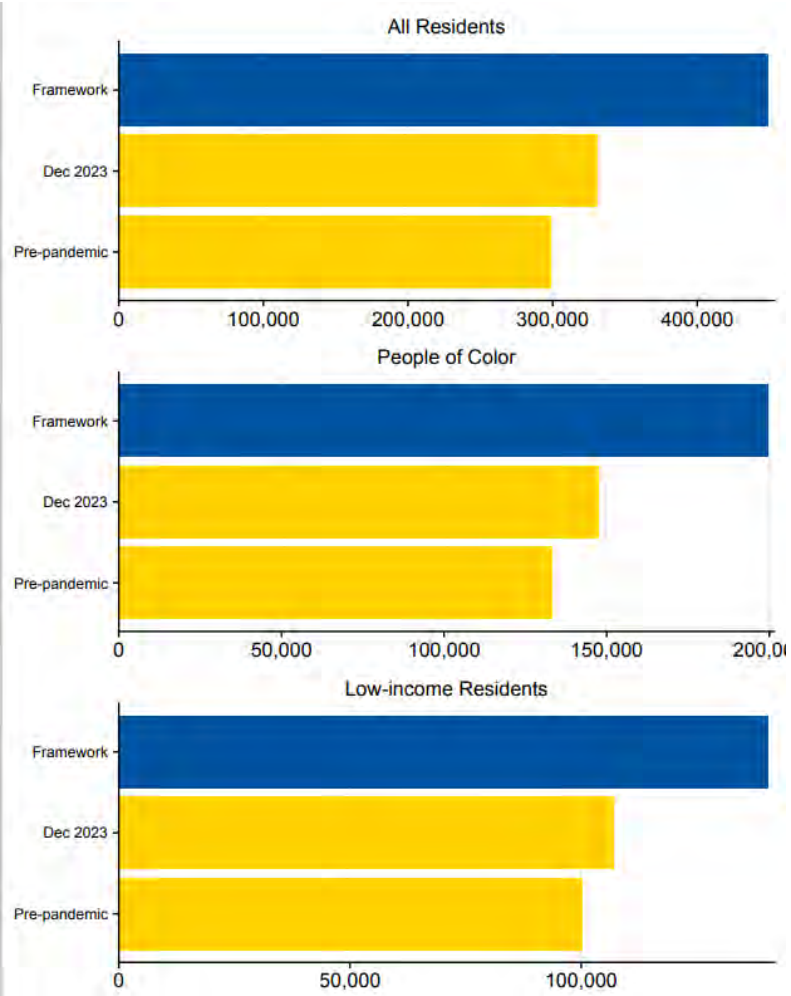


Progress is already underway to implement improvements on routes throughout the region

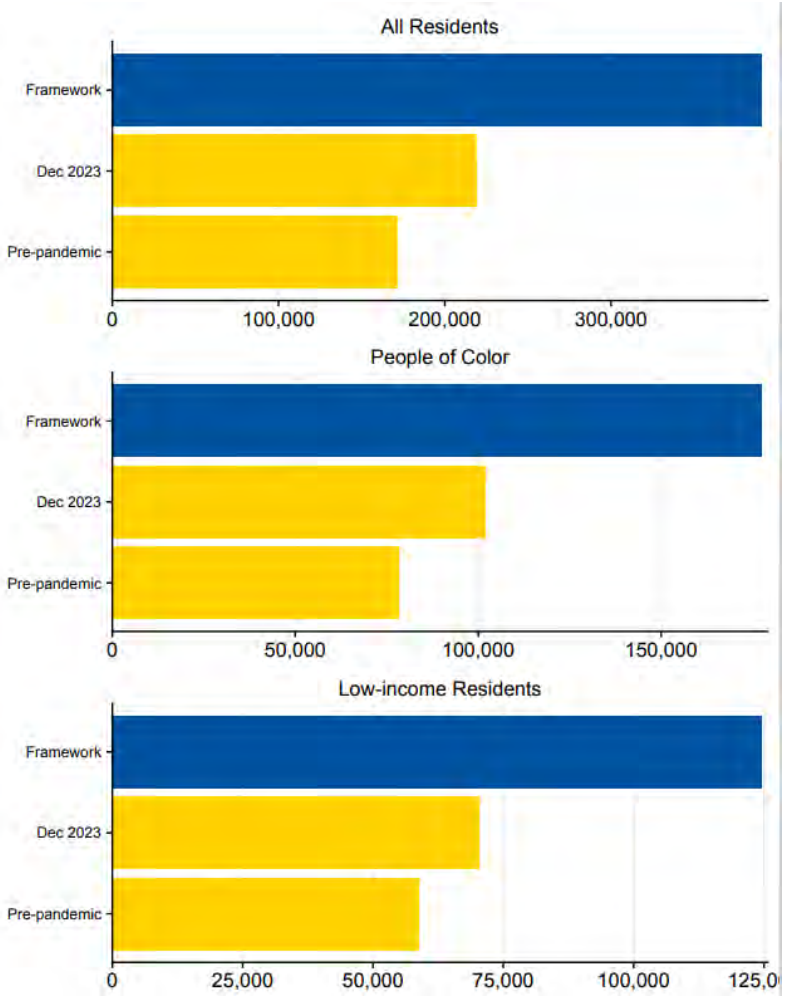
- 25 routes with improvements as of March 2025

Evaluation Results: Residents within 5-minutes of high frequency or better service

Weekday Midday



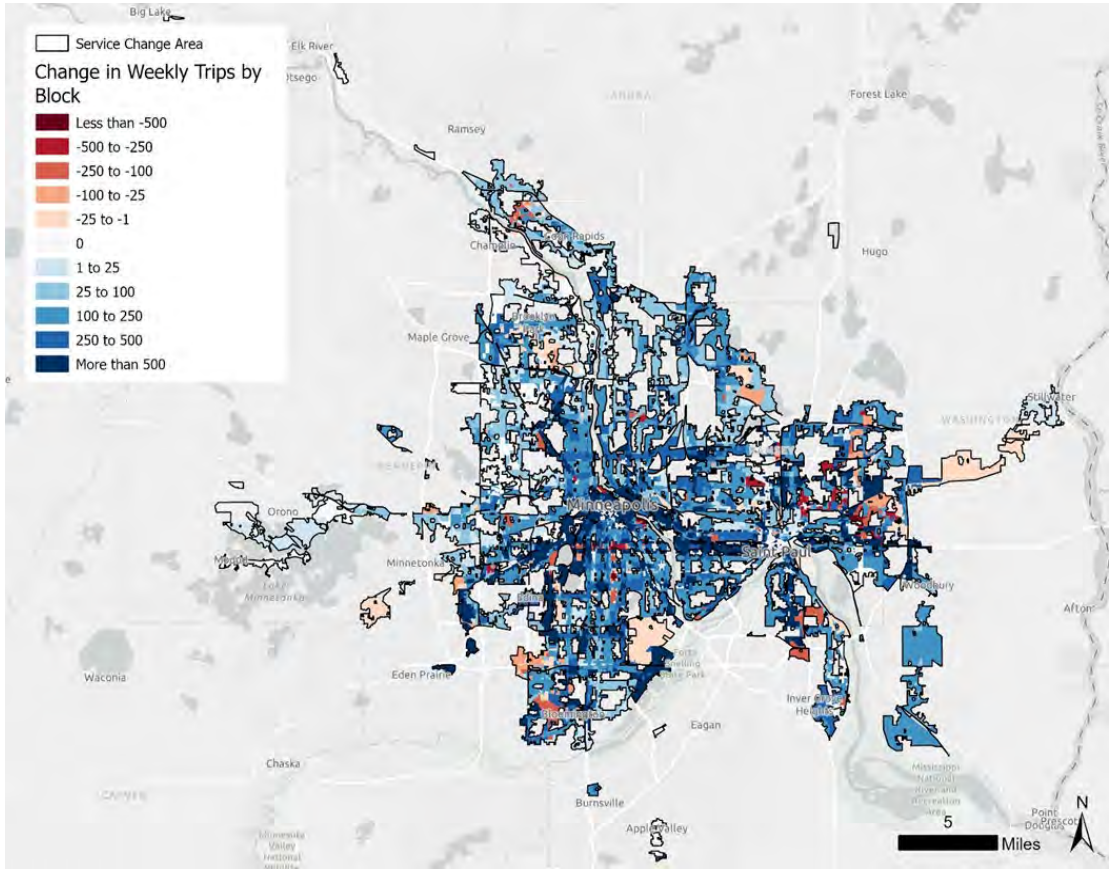
Sunday Midday



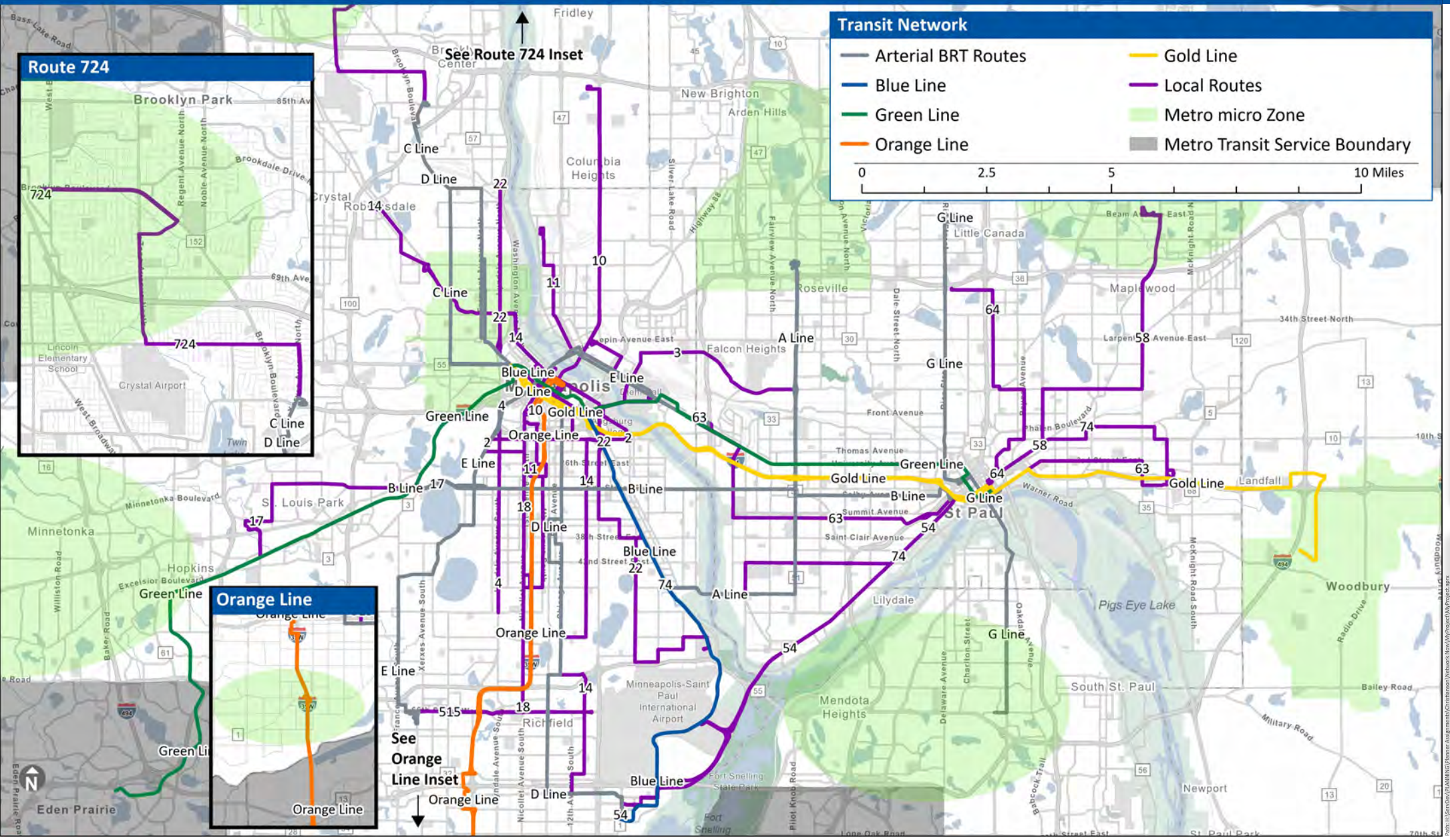
- Availability of high frequency service on weekdays increases by 35% over baseline levels
- Availability on Sundays nearly doubles

Title VI Service Equity Evaluation

- Compares the change in weekly trips serving BIPOC and/or low-income communities to changes serving White and/or non-low-income communities
- Results: no potential for disparate impact (race) or disproportionate burden (income) in review of absolute change
- Currently, 94% of Metro Transit trips serve low-income individuals, 80% serve BIPOC communities



High Frequency Routes



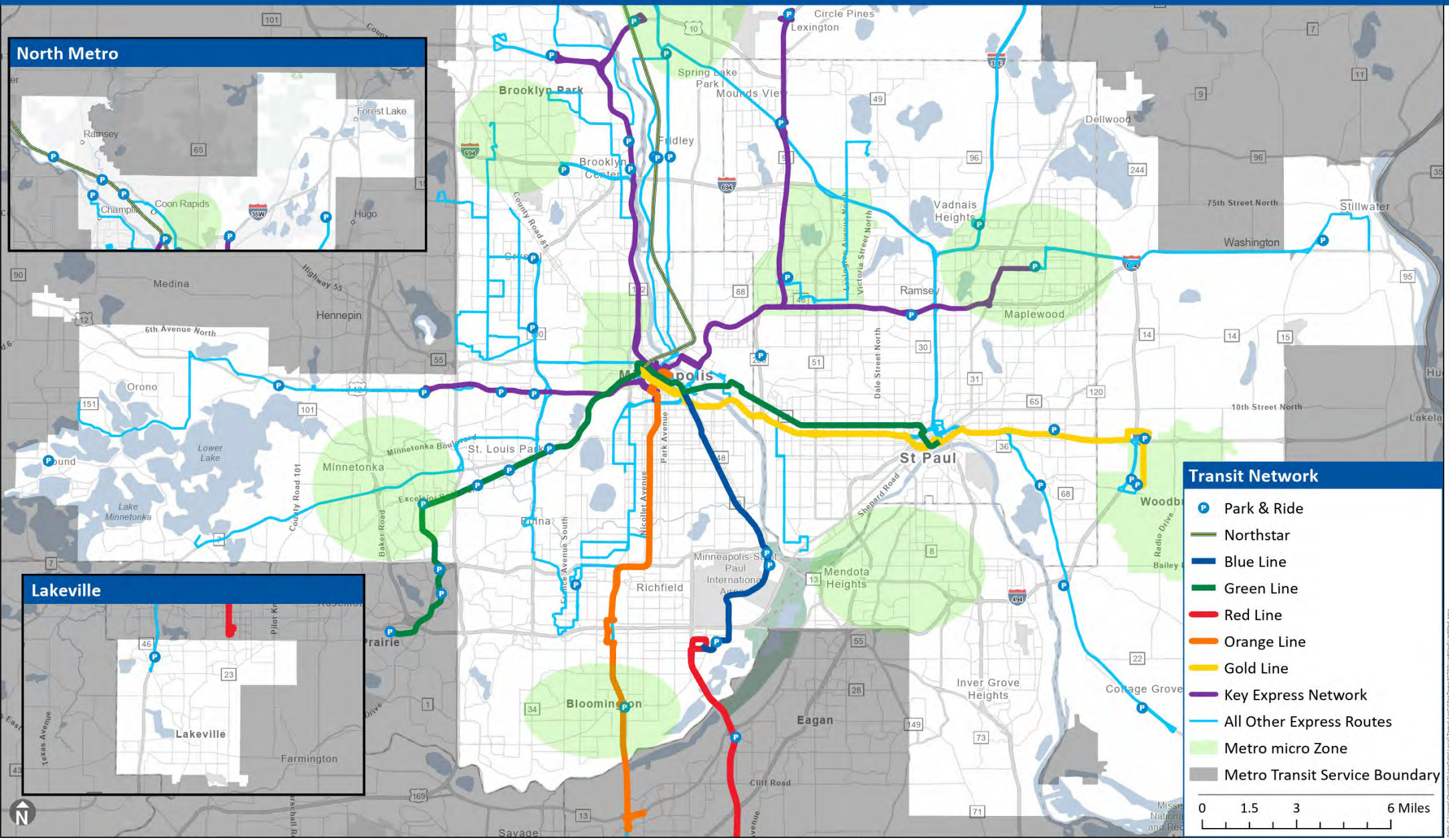
New weekday high frequency service on Gold Line/Extension, Green Line Extension, B Line, E Line, G Line, Routes 22, 58, 74 and 515

More of our region can access frequent all-day service in walking distance

Metro Transit

Date: 2/24/2025

Commuter Oriented Service Network



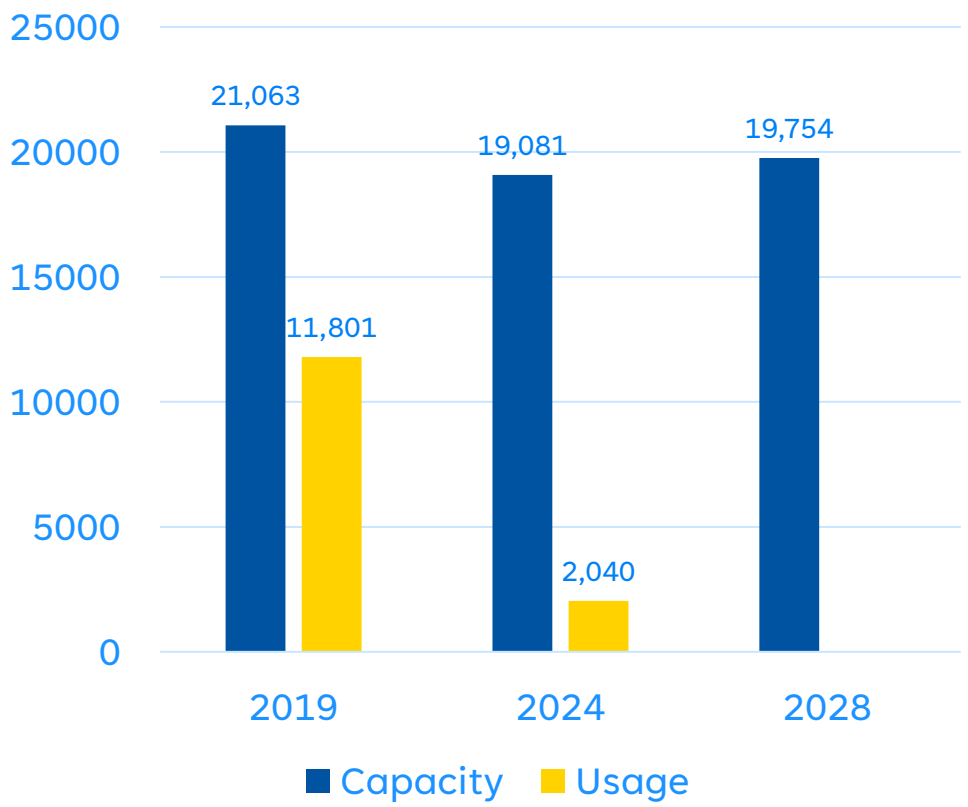
Key express network

- 15” service during highest ridership of rush hours
- Hourly midday bi-directional service
- Serves all major highway corridors
- Rt 250, 270, 673, 768, and 850

Metro Transit

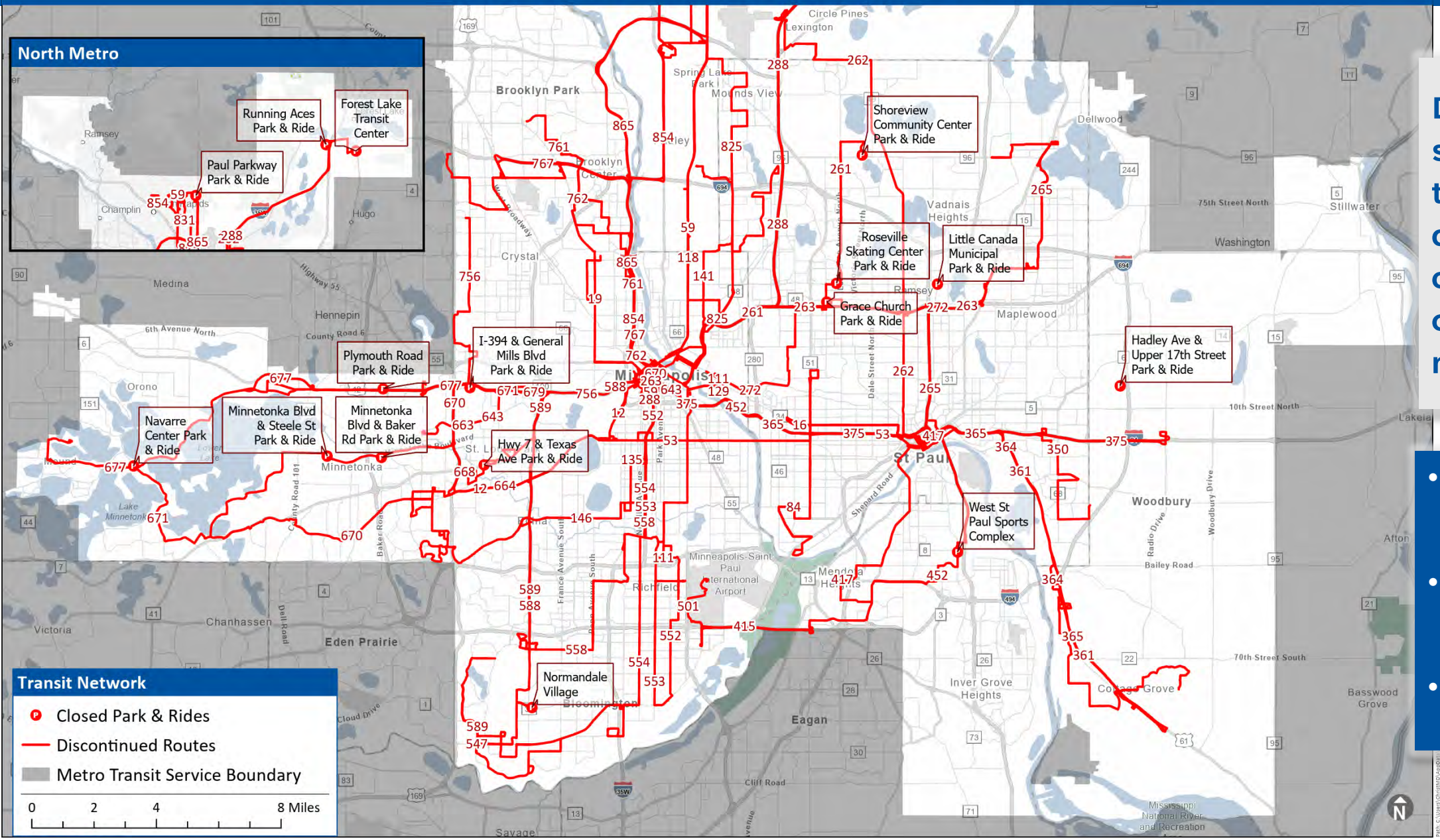
Date: 1/22/2025

Metro Transit Park & Ride System



Timeframe	Locations	Capacity
2019 System	**72**	**21,063**
2019-2024 closures	*-15*	*-1,982*
2024 System	**57**	**19,081**
2025-2027 closures	*-16*	*-1,710*
2025-2027 openings	*+10*	*+2,383*
2028 System	**51**	**19,754**

Discontinued Routes and Facilities



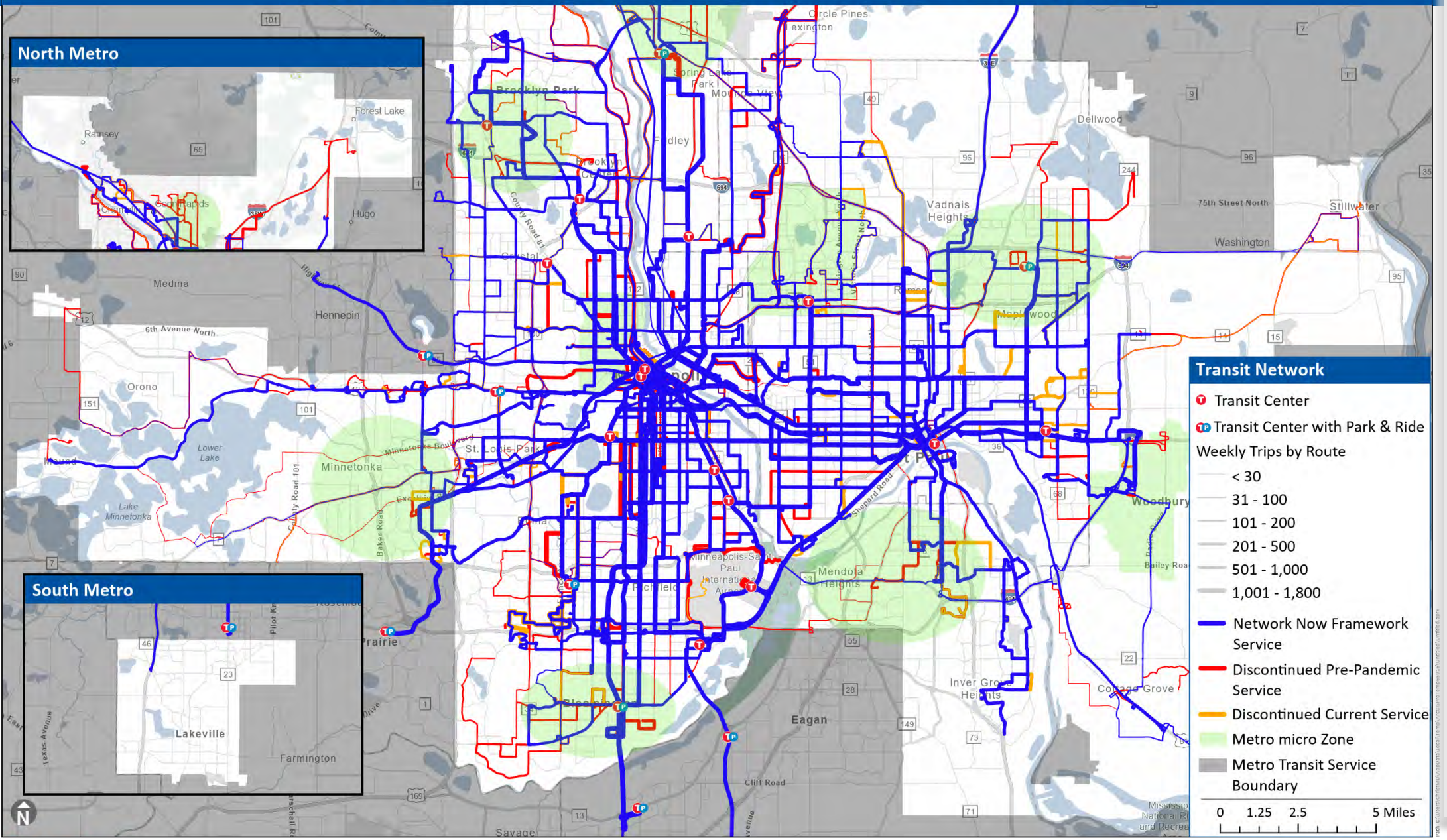
Discontinuing service to meet travel demand and strengthen commuter-oriented network

- 50 routes discontinued
- 16 park & rides closed
- 12 routes restored

Metro Transit

Date: 3/3/2025

Network Now Framework by Number of Weekly Trips



Network Now framework invests in frequent service

- 70+ routes improved frequency or span
- 26 routes with service 15”
- LRT 10-minute frequency
- 8 new micro zones
- 10+ routes with new areas of coverage

Next Steps

- Specific changes will be implemented as part of quarterly regular service changes in 2025 – 2027.
- Improvements sequenced on METRO line implementation, bus fleet and operator availability, ridership growth
- For discontinued service, begin to remove signs, close park-and-rides, and update system maps
- 2026 progress report

Proposed action

That the Metropolitan Council approve the discontinuation of 50 bus routes as outlined in Network Now framework and endorse the Network Now framework.

Metro Transit

Full project report available at metrotransit.org/network-now

Title VI Service Equity Analysis

Final Network Now Concept Plan

February 2025

Metro Transit

SRF

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, Metro micro, Metro Move, 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.

Table of Contents

Metropolitan Council 2
Metro Transit 2
Chapter 1: Introduction 4
Report Purpose 4
Federal Requirements 5
Chapter 2: Proposed Service Changes 6
Network Now 6
CHAPTER 3: TITLE VI PRINCIPLES AND DEFINITIONS 13
Title VI and Environmental Justice 13
Requirement to Conduct Service Equity Analyses 14
Title VI Definitions of Minority and Low-Income Populations 16
CHAPTER 4: ANALYSIS METHODOLOGY 18
Modeling Current and Proposed Service Levels 18
Assigning Transit Trips to Census Blocks 18
Demographic Data 19
Calculating Change in Service Level by Census Block 19
CHAPTER 5: EVALUATION OF IMPACTS 21
Affected Population 21
Change in Service by Census Block 22
Average Change in Service by Population Group 24
Mitigating Potential Disparate Impacts 26
CHAPTER 6: CONCLUSIONS 28

Chapter 1: Introduction

In 2023, Metro Transit began its Network Now planning process and engaged customers, community members, cities and counties from across the Twin Cities region on their values and priorities for transit. While collecting this feedback, Metro Transit also reviewed regional policy guidance and assessed recent network performance to understand how existing services have been meeting customers' needs. This stakeholder input informed the development of a decision-making framework, including the five Network Now principles that guide the remainder of the project.

From late 2023 to early 2024, Metro Transit conducted an agency-wide process to develop, evaluate, and prioritize transit service improvements based on the Network Now principles. These efforts culminated in the draft concept plan. The system-wide changes in this plan are the subject of this evaluation.

Network Now includes service changes for implementation through 2027, including the opening of new regional transitways, addition of new and improved bus routes, and restoration or discontinuation of routes that are currently suspended. All of these changes have the potential to impact the availability and quality of transit service throughout the region. 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 Network Now plan 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.

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 and absolute change in weekly scheduled transit trips differs between Black, Indigenous, and people of color (BIPOC) residents and white non-Hispanic (white) 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, or 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)[1], 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 Network Now.

[1] 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. Accessed February 12, 2025. This executive order was revoked in President Donald Trump's January 21, 2025 Executive Order 14173: Ending Illegal Discrimination and Restoring Merit-Based Opportunity. However, FTA guidance has not changed; nor has the Civil Rights Act of 1964.

Chapter 2: Proposed Service Changes

Network Now

Network Now establishes Metro Transit's service planning priorities through 2027. This plan documents the changes to the region's transit network that have occurred since 2019, builds on the success of rail and bus rapid transit investments, and guides how Metro Transit will invest in transit service to expand service and improve mobility. Through Network Now, Metro Transit will:

- Expand transit service by more than 40% to help attract more riders.
- Improve access by providing new bus routes and Microtransit (Metro micro) service.
- Modify commuter and express service to meet today's travel patterns
- Reduce greenhouse gas emissions by encouraging transit use.

Metro Transit will implement Network Now in phases as it continues hiring more operators, mechanics, and other support staff through 2027. Metro Transit will prioritize service improvements based on community feedback, resource availability, and operational needs.

Network Now is a collection of changes to the Metro Transit service network within the Metropolitan Council service area, also referred to as the Twin Cities region. The plan includes routes operated directly by Metro Transit, as well as routes operated by private providers under contract with the Metropolitan Council. The plan does not include the service operated by the region's other suburban transit agencies: Minnesota Valley Transit Authority (MVTA), Maple Grove Transit, Plymouth Metrolink, or SouthWest Transit.

Figure 1 and Figure 2 show the proposed system highlighting the local and high frequency networks and commuter-oriented service (including transitways and express buses). Both maps also show planned Metro micro zone locations demonstrating the role they will play connecting communities to fixed route service, especially transitways.

Figure 1. Network Now – Local route and high frequency service

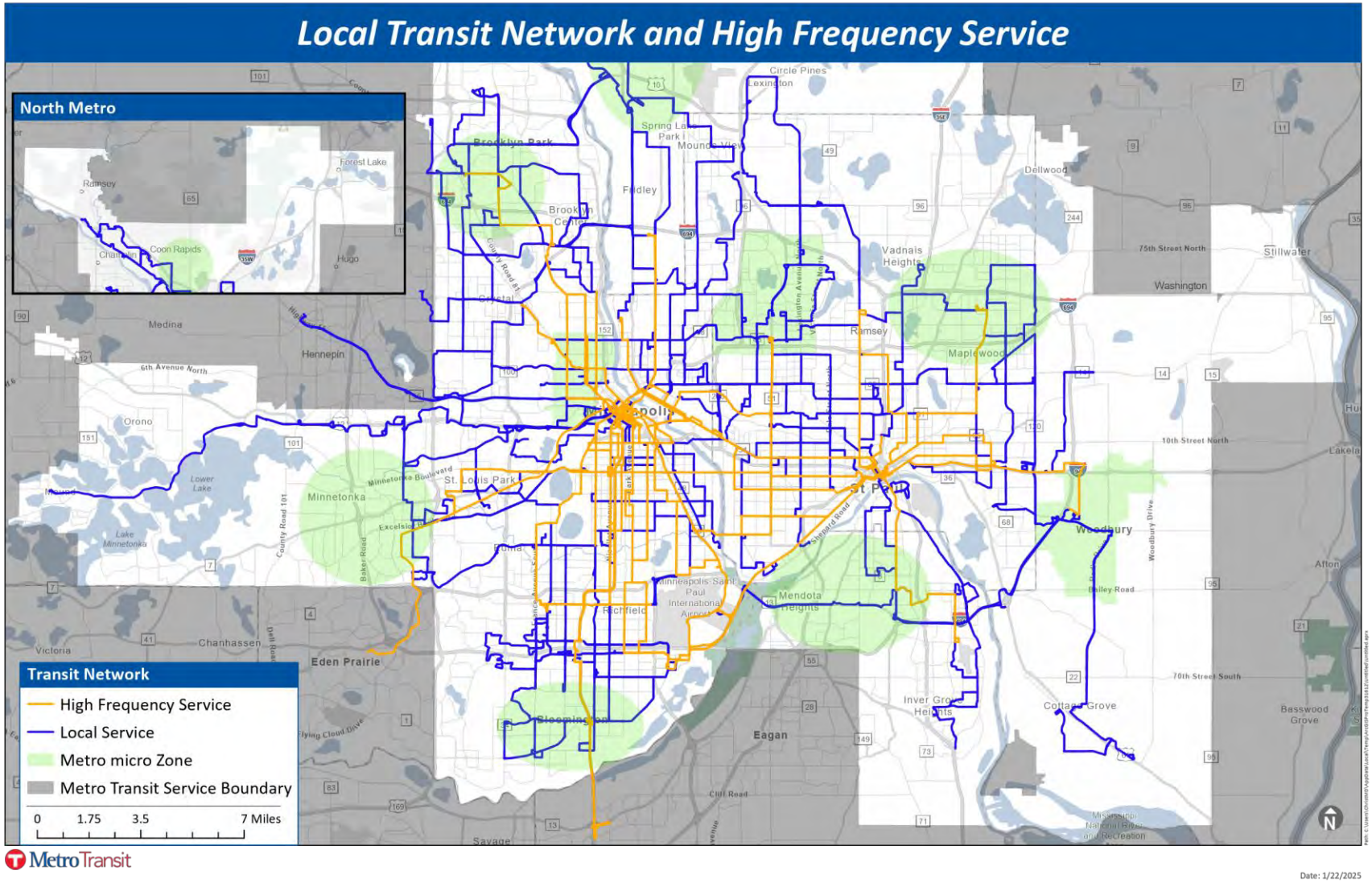
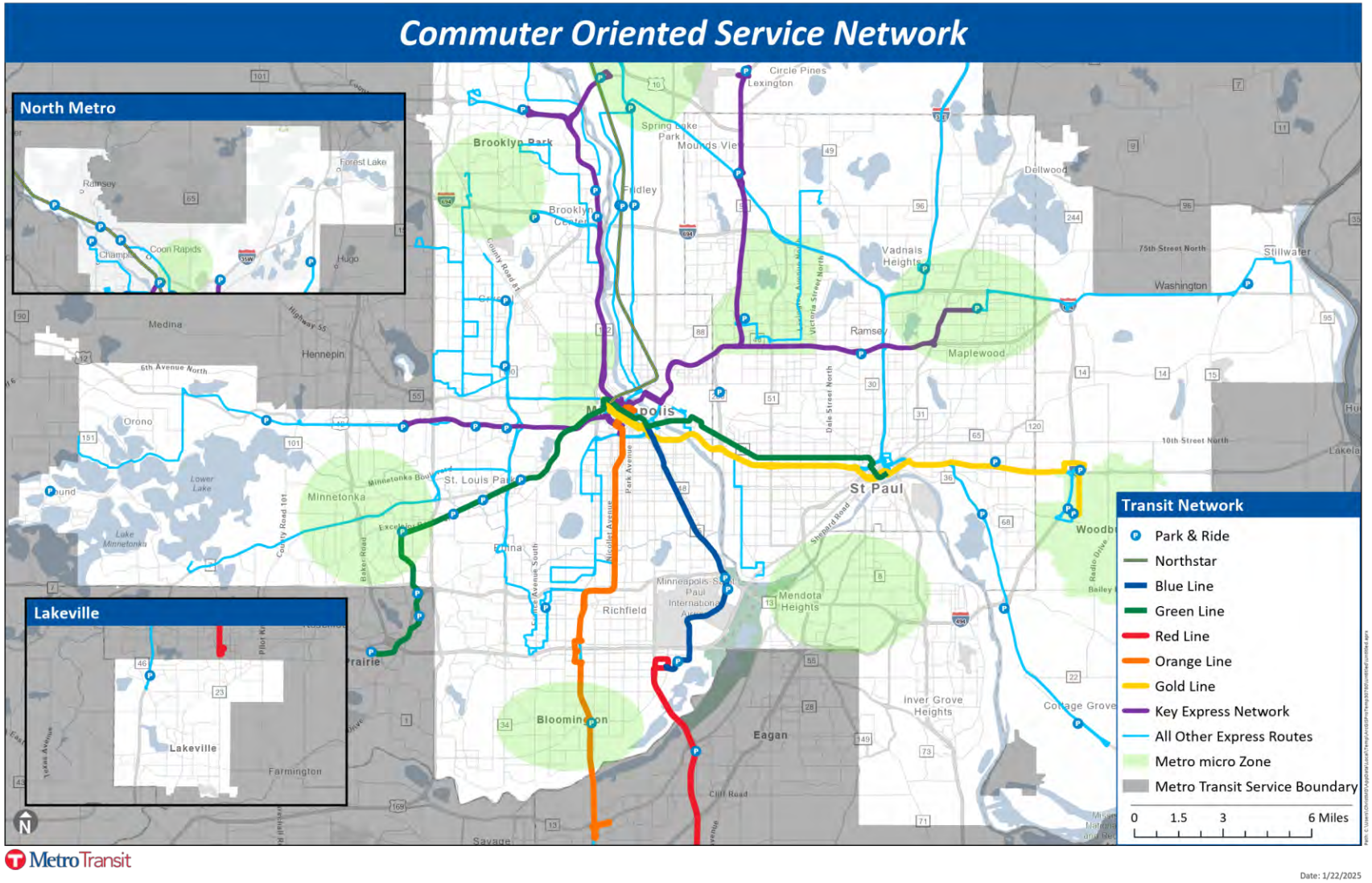


Figure 2. Commuter oriented service network



Service Plan

The following section provides a brief summary of the planning process that went into the development of the Network Now plan and route by route service changes.

Planning Process

Metro Transit's Network Now decision-making framework is summarized in the Establishing the Foundation report released in Fall 2023. The decision-making framework is informed by regional policy guidance, recent transit system performance, and customer feedback, and includes three supporting chapters as follows:

- **Policy guidance:** Metro Transit's services are governed by regional policy documents adopted by the Metropolitan Council, as well as more detailed supporting standards and guidelines. These are summarized in detail in Chapter 1: Regional Policy Guidance.
- **Network performance and opportunities:** Metro Transit has documented service changes from 2020 to 2023 and has analyzed changes in ridership and travel patterns since the pre-pandemic era. Network Now's evaluation of recent transit service performance is summarized in the Chapter 2: Network Performance and Opportunities.
- **Engagement and customer feedback**: Metro Transit conducted extensive public outreach activities as part of the development of the Network Now decision-making framework. Engagement efforts reached more than 6,000 people, including customers from across Metro Transit's service area and from low-income groups and communities of color. Metro Transit also conducted internal engagement to incorporate feedback from front line staff in developing service options. Results of these engagement efforts are summarized in detail in Chapter 3: Engagement and Customer Feedback.

More information on the decision-making framework, including an Executive Summary, can be found at metrotransit.org/network-now.

Proposed Service Changes

The Network Now concept plan calls for frequency and/or span improvements on most local routes, while express bus routes will be consolidated to offer more frequent service in major travel corridors. The METRO network will see significant service expansion as new light rail and bus rapid transit projects are implemented. Coverage will be supplemented by expansion of Metro micro, the agency's multi-zone microtransit service, to eight new zones within the Metro Transit service area.

Figure 3 and Figure 4 summarize the service and frequency changes that will be implemented as part of the Network Now concept plan. More detail on each of these changes can be found online at metrotransit.org/network-now.

Figure 3. Network Now summary of service changes



Source: https://www.metrotransit.org/Data/Sites/1/media/network-now/network_now_final_report_rsv.pdf

Figure 4. Network Now – summary of weekday midday frequency levels



Source: https://www.metrotransit.org/Data/Sites/1/media/network-now/network_now_final_report_rsv.pdf

Regional Transitway Service Changes

The METRO network which includes highway BRT, guideway BRT, and light rail transitways, represents a significant portion of Metro Transit's planned investment in regional transit service. Arterial BRT lines are also part of the METRO network but are not reflected in Figure 2. The Network Now concept plan includes frequency and span improvements on existing transitways, as well as the implementation of four new BRT transitways and extension of one light rail corridor by 2027.

The changes listed below will all occur within the timeframe of Network Now. Other transitways are planned beyond 2027, including the implementation of the F Line, Phase 2 of the G Line, H Line, Purple Line, and Blue Line Extension. Specific supporting service decisions have yet to be finalized for these lines, but decisions made as part of Network Now for local and regional service will affect their planning and development.

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.

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[2] - 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.

Title VI was identified as one of several Federal laws that should be applied "to prevent minority communities and low-income communities from being subject to disproportionately high and adverse environmental effects."

To provide direction to recipients of federal funding, FTA issued Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients in 2012. 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

[2] 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. Accessed February 12, 2025. This executive order was revoked in President Donald Trump's January 21, 2025 Executive Order 14173: Ending Illegal Discrimination and Restoring Merit-Based Opportunity. However, FTA guidance has not changed; nor has the Civil Rights Act of 1964.

- Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

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. This report references several elements from the current Title VI Program, approved by the Metropolitan Council in 2022.

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 (defined below). 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 "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.

Major Service Change Policy

Metro Transit's Major Service Change Policy is defined the 2023-2025 Metropolitan Council Title VI Program. Four criteria are included in the policy:

1. **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)**
2. **A new route in a new coverage area (minimum net increase of more than 3,500 annual in-service hours)**
3. **Restructuring of transit service throughout a sector or sub-area of the region as defined by Metro Transit**
4. **Elimination of a transit route without alternate fixed route**

A service change meeting any of these four thresholds qualifies at a major service change and requires an equity analysis.

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.

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.

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 policy 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 a 90 percent threshold, which states that there may be evidence of disparate impact if:

- *Benefits* are being provided to BIPOC populations at a rate less than 90 percent of the benefits being provided to white populations, or
- *Adverse* effects are being borne by white populations at a rate less than 90 percent 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 90 percent threshold suggests that a selection rate for any racial, ethnic, or gender group that is less than 90 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. 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 90 percent threshold for its disparate impact and disproportionate burden thresholds was subject to a formal public outreach process before being adopted by the Metropolitan Council in 2022. Prior to the 2022 policy update, 80 percent was the threshold. Additional information about the policies and their applications can be found in the Council's current Title VI Program.

Policies Applied to this Proposed Service Change

The proposed package of service changes evaluated in this report restructure transit service throughout the region representing an expansion in service of more than 35 percent. These changes meet at least two of Metro Transit's criteria for a major service change:

1. **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)**
3. **Restructuring of transit service throughout a sector or sub-area of the region as defined by Metro Transit**

The proposed service change will increase the number of weekly scheduled transit trips available to the average resident. As such, in this analysis, if the quantitative results indicate that the benefits for BIPOC residents are less than 90 percent of the benefits for white 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 residents relative to non-low-income residents.

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. 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" matching the terminology used by the FTA.

Title VI Circular and other federal guidance

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 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 using other established measures that are at least as inclusive as those developed by HHS.

Correspondingly, this Title VI service monitoring analysis uses 185 percent of the 2019-2023 5-Year ACS U.S. 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.

The Metropolitan Council uses 185 percent 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.

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 or half mile/10-minute walk or roll from a transitway station) based on the street network.
3. Calculate the percent change (and absolute 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 (and absolute 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 weekly 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. The existing network is the December 2023 published schedule while the proposed network is all service changes recommended by Metro Transit in Network Now. Network Now will be implemented over several years ending in 2027. This analysis considered the impacts to service levels for census blocks throughout the whole of Metro Transit's fixed-route service area. It does **not** consider existing nor proposed Metro micro service levels, nor does it include impacts of expanding Metro micro service

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, transitway (light rail, commuter rail, and bus rapid transit) stations were 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.). Due to the large size of some census blocks, if a stop or station is located within a block it is also included in the analysis, even if the geographic center is not within the walk distance threshold.

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 aerial interpolation techniques to the 2019-2023 American Community Survey (ACS) 5-year Estimates.

Calculating Change in Service Level by Census Block

Two methods have been applied in this analysis for calculating change in service level by block: absolute change and percent change. The absolute change in service 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 percent, including those that are incalculable due to no existing service, were adjusted to a maximum absolute value of 100 percent.

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 absolute and percent changes in service for each target population (i.e., BIPOC, white, low-income, and non-low-income) were calculated by weighting the absolute and percent changes in service for each census block by the target population served in that census block. For example, the average absolute and percent changes in service for BIPOC populations were calculated by multiplying each census block's BIPOC population by the absolute and percents 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 formulas used for these analyses are shown in Figure 5.

Figure 5. Formulas for determining average percent and absolute changes in service

$$Avg\ abs\ change\ in\ service = \frac{\sum(Population_i \times Absolute\ Change_i)}{\sum Population_i}$$

$$Avg\ \%\ change\ in\ service = \frac{\sum(Population_i \times Percent\ Change_i)}{\sum Population_i}$$

Where:

$Population_i$ = Target population of census block *i*.
$Absolute\ Change_i$= Absolute change in service levels for census block i
$Percent\ Change_i$ = Percent change in service levels for census block *i*

In this manner, the weighted absolute and percent changes were 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

The proposed service changes in Network Now impact the entirety of Metro Transit's service area. Figure 6 and Figure 7, respectively, show the distribution of BIPOC and white residents and low-income and non-low-income residents, by census block, within the service area. The service equity analysis measures the impact to these residents. Areas with zero population are excluded from the analysis.

Figure 6. Distribution of BIPOC and white populations

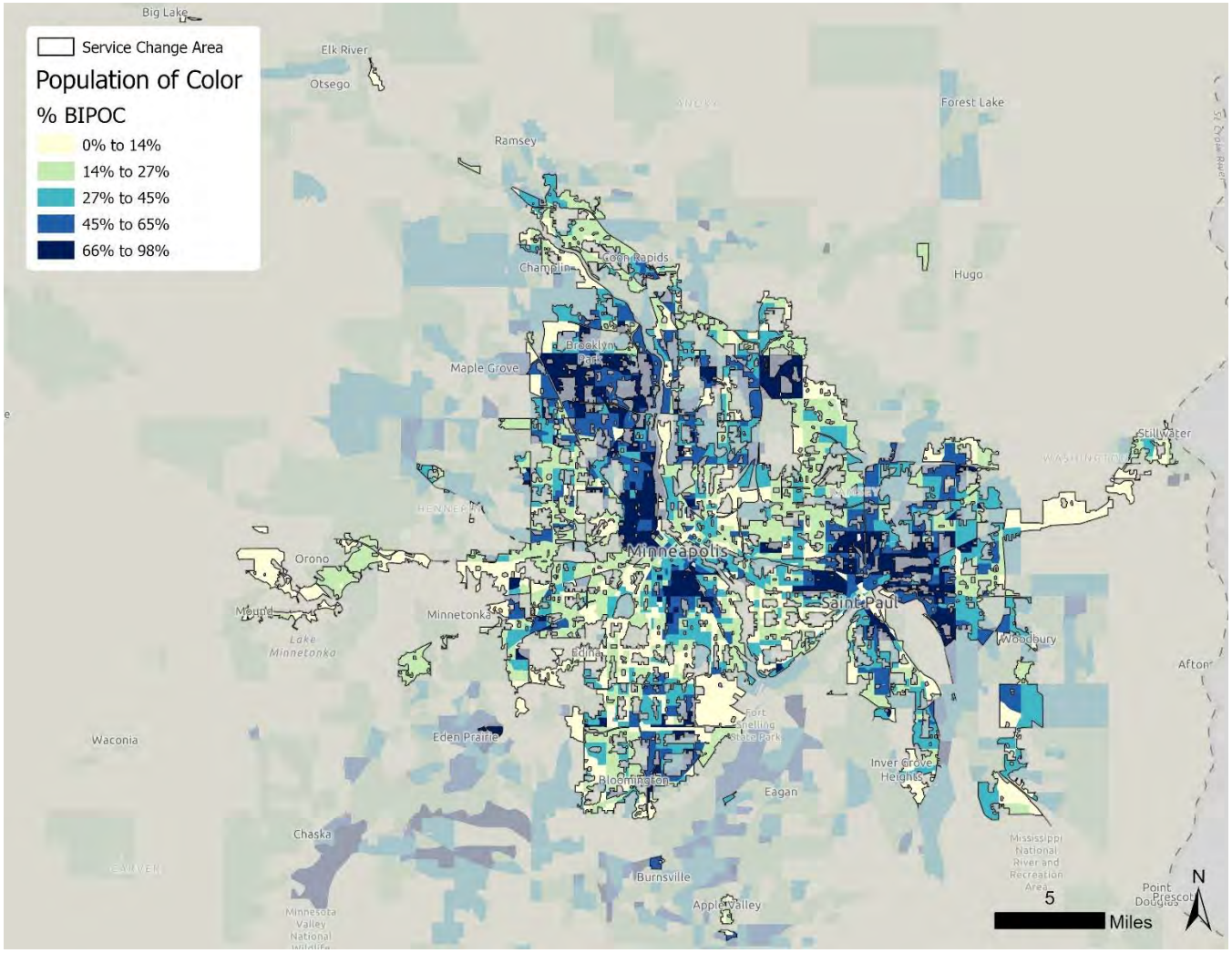
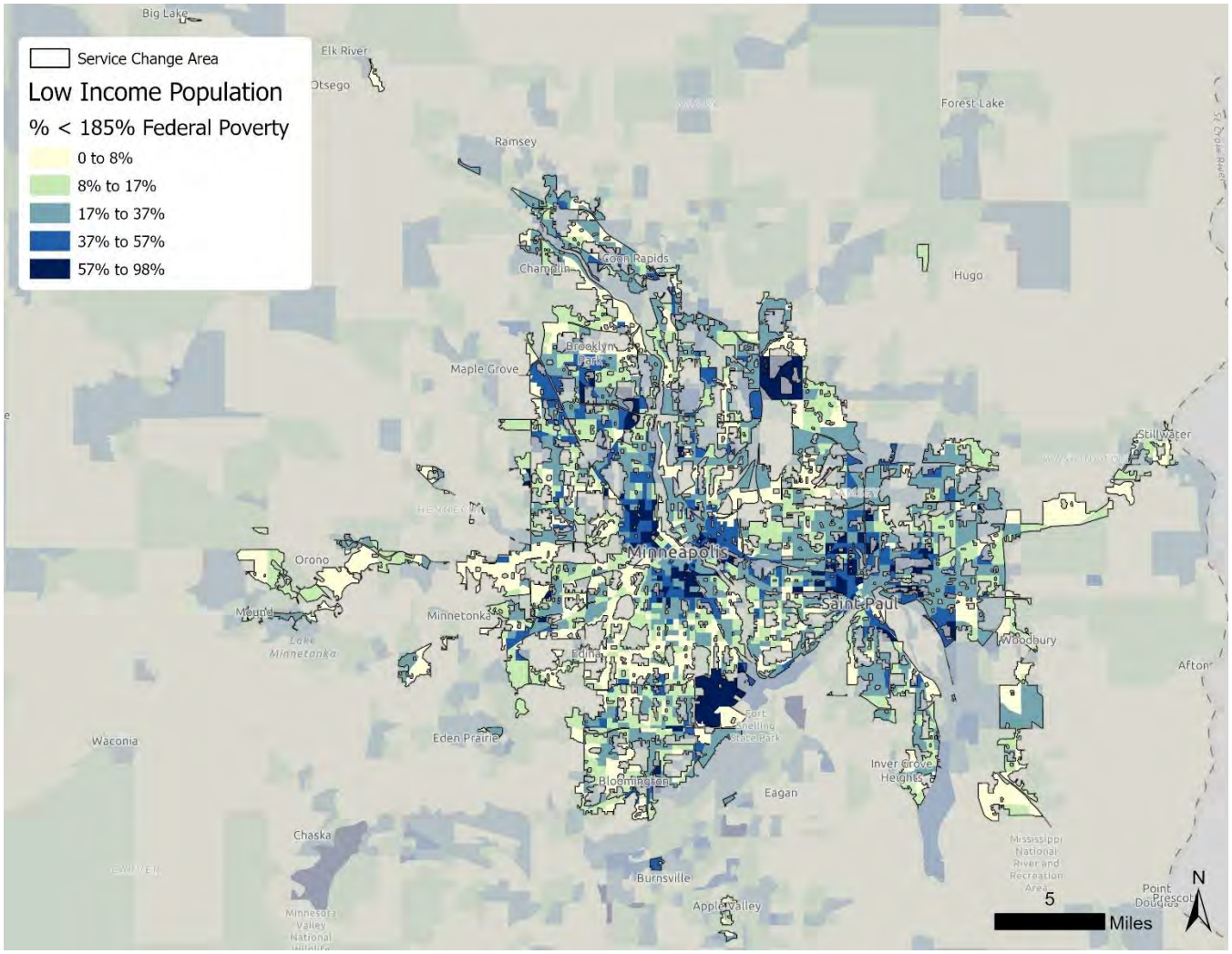


Figure 7. Distribution of low-income and non-low-income populations



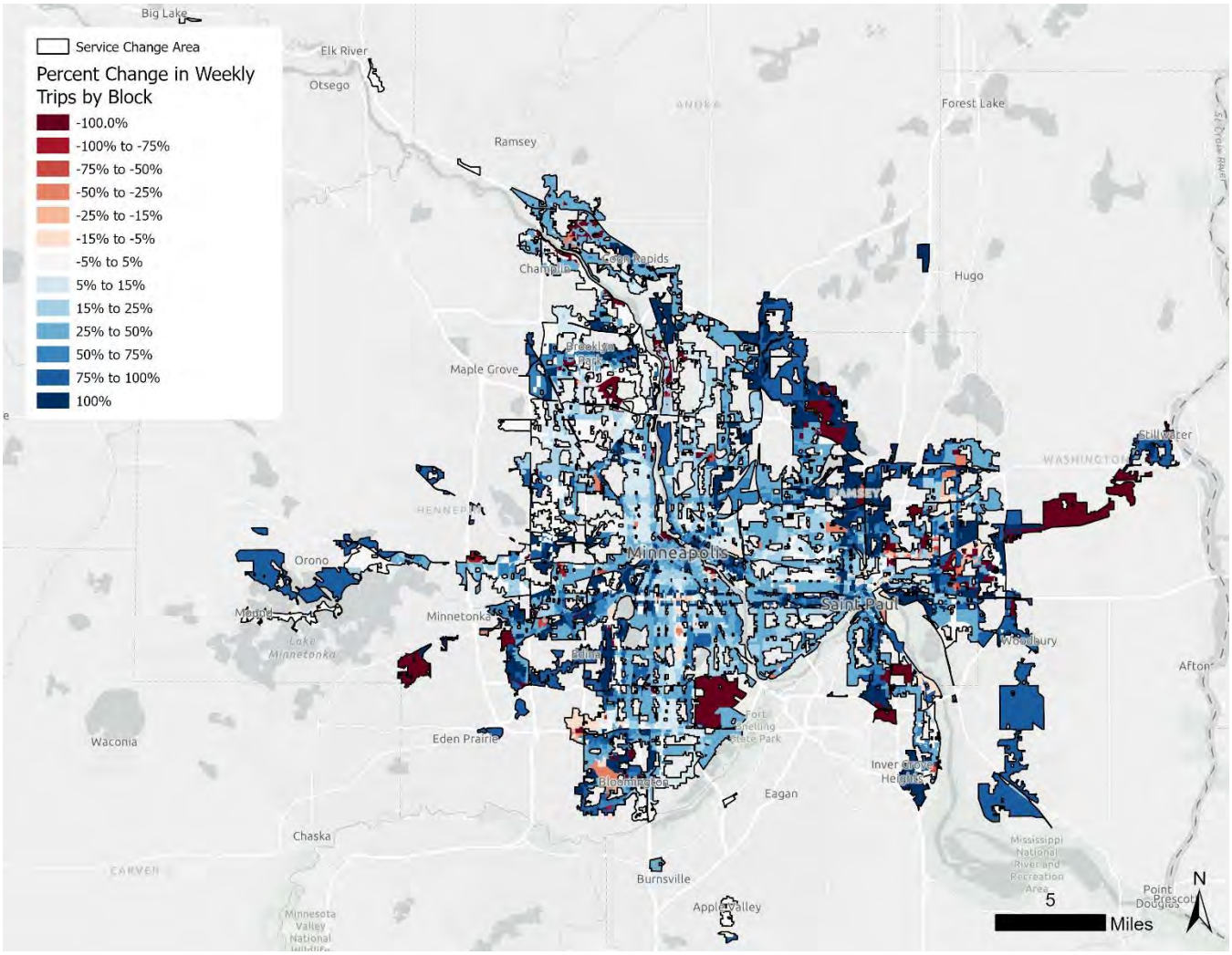
Change in Service by Census Block

This section highlights proposed service changes spatially. The percent change in transit service level, as measured by weekly scheduled transit trips by census block, is shown in Figure 8 and the absolute change in weekly scheduled trips by census block, is shown in Planned transitways including METRO B, E, and Gold Lines and METRO Green Line Extension stand out in select areas as major service increases. Similar to the percent change map, areas in northern and eastern Saint Paul show variation in service increases and decreases due to planned restructuring. The absolute change results differ from the percent change results in their deemphasis of changes to low-frequency suburban routes such as Route 294. Similarly, the absolute change map highlights service increases in core urban areas which may be small on a relative basis and yet are major investments in transit service hours.

Figure 9.

The percent change map emphasizes areas where service is being returned and discontinued (changes of 100 and -100 percent). Many of these areas occur on the outer edges of the service area where routes offering limited service have been restructured or discontinued. For example, Route 294 which runs one trip per day from downtown Saint Paul to Stillwater with service to Oakdale and Lake Elmo is being discontinued. Service to Stillwater will be replaced by new express service, Route 291. As a result, areas in Lake Elmo appear dark red in the percent change map. Areas in northern and eastern Saint Paul also stand out in the percent change map due to significant route restructuring in these areas. Routes in this area are planned for adjustment to streamline and simplify service in accordance with boarding and alighting patterns.

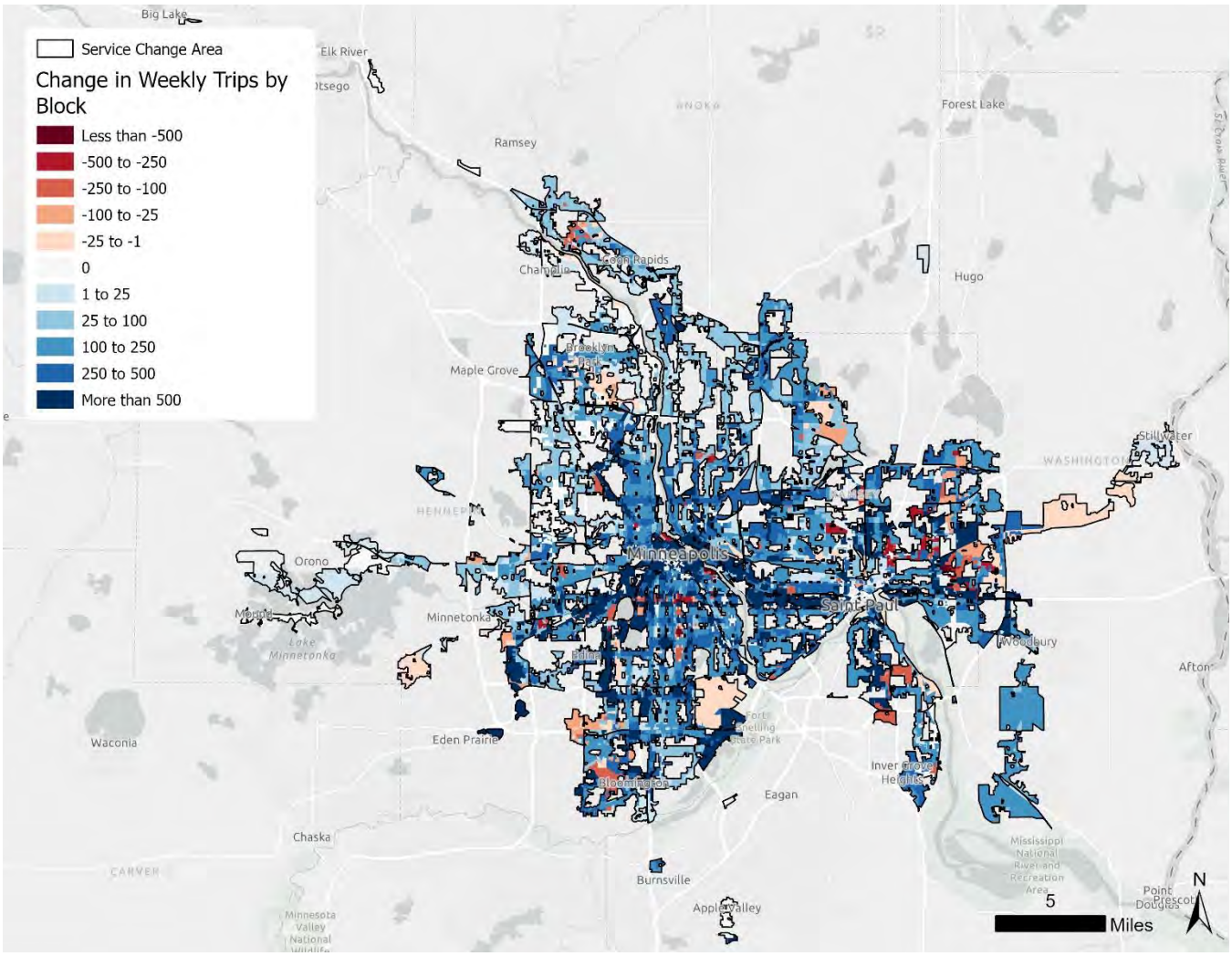
Figure 8. Percent change in weekly service by census block



The absolute change in weekly trips map (Figure 9) shows where incrementally more (or fewer) resources are planned for investment. Planned transitways including METRO B, E, and Gold Lines and METRO Green Line Extension stand out in select areas as major service increases. Similar to the

percent change map, areas in northern and eastern Saint Paul show variation in service increases and decreases due to planned restructuring. The absolute change results differ from the percent change results in their deemphasis of changes to low-frequency suburban routes such as Route 294. Similarly, the absolute change map highlights service increases in core urban areas which may be small on a relative basis and yet are major investments in transit service hours.

Figure 9. Absolute change in weekly trips by census block



Average Change in Service by Population Group

Two of the guiding principles for Network Now focus on building on success to grow ridership: adding service where people use transit and the most and advancing equity and reducing regional disparities. The changes in Network Now improve frequency or span of service for all population groups included in this analysis. Title VI analysis has been completed using both percent and absolute change in weekly trips. The following sections include results and conclusions of both analyses.

Percent Change in Weekly Trips

Table 1 summarizes the average percent change in service level for each target population group. On average, the proposed service changes associated with introduction of the Network Now result in a notable increase in transit service availability for residents within the service change area, 37 percent. When disaggregated by population group, the percent changes in service range from 34 percent (BIPOC residents) to 39 percent (white residents).

Table 1. Average percent change in service

Population Group	Average Percent Change in Service	Affected Population
Black, Indigenous, and People of Color	34%	477,868
White non-Hispanic	39%	702,457
Disparate Impact Comparison Index[1]	**0.87**	-
Low-Income	36%	304,626
Non-Low-Income	37%	849,197
Disproportionate Burden Comparison Index[2]	**0.97**	-
Total Population	37%	1,180,325

[1]34% / 39% = 0.87
[2]36% / 37% = 0.97

Absolute Change in Weekly Trips

In addition to looking at the percent change in service levels in census blocks for specific populations, this analysis also determined the average absolute change in weekly trips. On average, residents in the service change area will see an increase of 396 weekly trips (Table 2).

The average absolute change in weekly trips provides extra context to the percent change results by population group. As shown below in Table 2, BIPOC and white residents would each experience and increase of 392 and 399 weekly trips, respectively. Low-income residents would experience the highest absolute increase of 443 weekly trips while non-low-income residents would have the most modest increase of 370 weekly trips.

Table 2. Average absolute change in service

Population Group	Absolute Change in Weekly Trips	Affected Population
Black, Indigenous, and People of Color	+392	477,868
White non-Hispanic	+399	702,457
Disparate Impact Comparison Index[1]	**0.98**	-
Low-Income	+443	304,626
Non-Low-Income	+370	849,197
Disproportionate Burden Comparison Index[2]	**1.20**	-

Total Population	+396	1,180,325

[1]392 / 399 = 0.98
[2]443 / 370 = 1.20

Results Summary

The outcomes of this Title VI analysis are summarized in Table 3 for percent change and absolute change. In order to avoid the potential for disparate impacts or disproportionate burden, the comparison ratios must exceed 0.90. The two analysis methods result in different outcomes for comparing service change benefits for BIPOC and white residents (measure of disparate impact). However, in comparing service change benefits for low-income and non-low-income residents, the two analysis approaches yield the same results (measure of disproportionate burden).

Table 3. Summary of Title VI impacts

Method	Disparate Impact Ratio	Disparate Impact Result	Disproportionate Burden Ratio	Disproportionate Burden Result
Percent Change in Weekly Trips	0.87	Potential Disparate Impact	0.97	No Disproportionate Burden
Absolute Change in Weekly Trips	0.98	No Disparate Impact	1.20	No Disproportionate Burden

The average BIPOC resident would experience a 34 percent increase in service following the proposed changes, which is just slightly less than the average for white resident, who would experience a 39 percent increase. The ratio of these percent changes is 0.87. Therefore, per Metro Transit's Title VI policies, this analysis identifies **a potential for disparate impact on BIPOC residents** resulting from the proposed service changes of implementing Network Now. However, in reviewing the comparison in terms of absolute change in weekly trips, the increase of 392 weekly trips for BIPOC residents relative to the increase of 399 weekly trips for white residents is 0.98. Further investigation into the potential impact and/or mitigation measures are recommended.

The average low-income resident in the service change area would experience a 36 percent increase in transit service after the proposed changes. This service increase is just less than that for the average for non-low-income individual, who would receive a 37 percent increase, a ratio of 0.97. Therefore, per Metro Transit's Title VI policies, this analysis identifies **no disproportionate burden on low-income residents** resulting from the proposed service changes associated with Network Now's implementation. Similarly, in comparing the absolute change in weekly trips, low-income residents would experience an increase of 443 weekly trips compared to 370 for non-low-income residents, a ratio of 1.20.

Mitigating Potential Disparate Impacts

The service changes in Network Now show the potential for disparate impacts when comparing changes in service for BIPOC residents to changes in service to white residents. However, this potential is only shown when comparing relative increases in service as percent change and not when

comparing absolute change in service availability. Both population groups will gain access to a similar number of additional weekly trips following Network Now implementation.

A key reason for the discrepancy in results between methodologies is the baseline level of service available to the average BIPOC resident as compared to the average white resident in Metro Transit's service area. In the baseline scenario (December 2023), the average BIPOC resident was served by 995 trips per week relative to the 850 weekly trips available to the average white resident. The absolute change in weekly trips available to both population groups with the recommended Network Now service changes is nearly equal (392 versus 399) meaning that more service will continue to be available to the average BIPOC resident than the average white resident after implementation. However, because the baseline for BIPOC residents is higher than for white residents, the relative increase for BIPOC residents is less significant.

In addition to the difference in baseline level of service, select service changes impact the relative service change for BIPOC residents. Relatively high concentrations of BIPOC residents live in the area just north and northeast of downtown Saint Paul. In Figure 8, the area shows a mix of relative service increases and decreases directly adjacent to each other. This area has a broad level of service restructuring planned which will consolidate service by reducing route branching. Multiple routes including Routes 64 and 74 will have low productivity branches discontinued. The outcome of these changes is more frequent service with more regular spacing which may require riders to walk slightly further from their home locations (exceeding the 5-minute walk time threshold used here). These changes were designed to mitigate impacts to riders as much as possible therefore additional mitigation measures are not recommended.

CHAPTER 6: CONCLUSIONS

Recipients of federal funding including 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 a series of service changes as part of the Network Now Plan by 2027. Two of the guiding principles for Network Now focus on building on success to grow ridership: adding service where people use transit and the most and advancing equity and reducing regional disparities. Service changes are planned throughout Metro Transit's service area. Note that Network Now does include expansions to Metro micro, but these are not included in this report.

This analysis reviewed the percent and absolute change in weekly scheduled regular route transit trips resulting from the proposed changes. Comparison indices are calculated for BIPOC versus white residents (disparate impact) and low-income versus non-low-income residents (disproportionate burden). Per Metro Transit's Title VI policy, these indices must exceed 0.90, an indication that BIPOC residents will experience at least 90 percent of the benefits realized by white residents, and low-income residents will experience at least 90 percent of the benefits realized by non-low-income residents.

The Network Now plan includes a swath of major and minor route changes and a focus on transitways that will improve service in terms of relative and absolute weekly trips across all populations. BIPOC and white residents will see service increases of 34 percent (392 trips) and 39 percent (399 trips), respectively. Low-income residents will experience the highest absolute increase of 443 weekly trips on average (36 percent). Non-low-income residents will on average experience a more modest increase of 370 weekly trips (37 percent).

Upon 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 result in **no disproportionate burden on low-income populations** when comparing relative service levels before and after implementation. Though the initial screening found the potential for disparate impact on BIPOC populations based on percent change in service, **the potential disparate impact is removed when considering the absolute change in service available to average BIPOC residents** compared to white residents. The average BIPOC resident in Metro Transit's service area currently has access to a higher level of service than the average white resident. Thus, while the absolute change in service available to both groups is almost identical, the relative change for BIPOC residents is less significant than the relative change for white residents.

Metro Transit

INTERNAL MEMO

Date: February 17, 2025

To: Ryan O'Connor, Regional Administrator

From: Lesley Kandaras, General Manager
Adam Harrington, Director-Service Development

RE: METRO Gold Line Title VI Service Equity Analysis

Opening in March 2025, METRO Gold Line will connect St. Paul, Maplewood, Landfall, Oakdale, and Woodbury along a 10-mile alignment primarily consisting of bus-only lanes on or near I-94. Gold Line will substantially replace Route 351, which will be eliminated. A Title VI Service Equity Analysis (SEA) was completed to understand the potential for disparate impact to BIPOC populations and/or disproportionate burden to low-income populations in the Gold Line corridor.

This memorandum, which serves as a letter of acknowledgment, summarizes FTA Title VI requirements and SEA results. **Metro Transit requests your approval of the Gold Line SEA findings.**

FTA Circular 4702.1B and Council Policies

Title VI compliance typically requires an SEA for each major service change. Metro Transit is obligated to complete this SEA because Gold Line received FTA funding through the Capital Investment Grant Program. Council Policy 6.1 defines a Major Service Change, and Policy 6.2 outlines the Council's Disparate Impact and Disproportionate Burden (DI/DB) Policy threshold.

SEA Results

Detailed SEA methodology and results are available (see attached report). This method measures access from residential/home census tract, not accounting for locations served outside those census tracts on transit routes or connecting network. On average, service changes resulting from Gold Line implementation will result in an increase in service availability for all populations within the service change area. The average BIPOC resident would experience a 14.7% increase (compared to 14.6% for the average white resident), and the average low-income resident would experience a 17.0% increase (compared to 14.1% for the average non-low-income resident). **Therefore, the SEA identifies no disparate impact nor disproportionate burden.**

Next Steps

Metro Transit requests your approval of the Gold Line SEA findings of no disparate impact nor disproportionate burden due to implementing the Gold Line and eliminating Route 351. The Gold Line SEA report and acknowledgment letter will be included in the upcoming Title VI Plan update, which the Council will submit to the FTA in 2025.

Acknowledgement and Signatures

The initials and signatures of the following parties acknowledge that they have reviewed this memo and approve it for use in the upcoming Title VI plan update being submitted to the FTA in 2025.

Printed Name: Adam Harrington
Director, Service Development
Signature: Adam E Harrington
Date: 02/26/2025

Printed Name: Lesley Kandaras
General Manager, Metro Transit
Signature: Lesley Kandaras
Lesley Kandaras (Feb 26, 2025 16:03 CST)
Date: 02/26/2025

Printed Name: Ryan O'Connor
Regional Administrator, Metropolitan Council
Signature: Ryan T. O'C
Date: 02/26/2025

Title VI Service Equity Analysis

Introduction of the METRO Gold Line & Local Service Changes to Route 351

November 2024

Metro Transit

SRF

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, Metro micro, Metro Move, 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.

Table of Contents

Chapter 1: Introduction 4
Report Purpose 4
Federal Requirements 4
Chapter 2: Proposed Service Changes 6
Gold Line Project 6
Local Service Changes 7
CHAPTER 3: TITLE VI PRINCIPLES AND DEFINITIONS 9
Title VI and Environmental Justice 9
Requirement to Conduct Service Equity Analyses 10
Title VI Definitions of Minority and Low-Income Populations 12
CHAPTER 4: ANALYSIS METHODOLOGY 14
Modeling Current and Proposed Service Levels 14
Assigning Transit Trips to Census Blocks 15
Calculating Change in Service Level by Census Block 15
Determining Average Percent Change in Service 16
CHAPTER 5: EVALUATION OF IMPACTS 17
Affected Population 17
Percent Change in Service by Census Block 18
Average Percent Change in Service by Population Group 19
CHAPTER 6: CONCLUSIONS 21

Chapter 1: Introduction

Metro Transit and the Metropolitan Council are preparing to introduce the METRO Gold Line bus rapid transit (BRT) route in 2025. The new line will connect people across the region to job centers, housing options, transit stations and key destinations in the Interstate 94 corridor. The planned 10-mile BRT line will connect St. Paul, Maplewood, Landfall, Oakdale, and Woodbury generally along I-94, largely replacing Route 351 which will be discontinued.

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 Gold Line BRT 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 Gold Line.

Chapter 2: Proposed Service Changes

Gold Line Project

METRO Gold Line BRT will connect people across the region to job centers, housing options, transit stations and key destinations in the Interstate 94 corridor. The planned 10-mile bus rapid transit (BRT) line will connect St. Paul, Maplewood, Landfall, Oakdale, and Woodbury generally along I-94.

The Gold Line corridor stretches approximately 10 miles between Saint Paul and Woodbury. The project includes 16 improved stations in downtown Saint Paul, Saint Paul East Side neighborhoods, Maplewood, Landfall, Oakdale, and Woodbury. (Figure 1).

Bus rapid transit, or BRT, is a bus service that operates similar to light rail transit. BRT offers transit customers unique features that deliver fast, comfortable, and cost-effective services using bus-only lanes. Some features of BRT service include: more frequent service, a faster ride, stations with enhanced amenities, and specialized buses. Gold Line will be Minnesota's first BRT line that operates primarily within bus-only lanes. Bus-only lanes are travel lanes or roads that will only be used by transit buses and will be built generally north of and near I-94. These separate lanes will ensure buses are never delayed due to traffic congestion. Approximately 70 percent of the Gold Line route will have bus-only lanes.

The Gold Line will provide frequent, all-day service, in both directions, seven days a week connecting the east metro to the regional METRO network and connecting people across the region to job centers, housing options, other transit lines, and key destinations in the I-94 corridor. Approximately 14 percent of all households within half-mile from Gold Line stations are without cars, and an estimated 93,000 jobs are located just a half-mile from Gold Line stations.

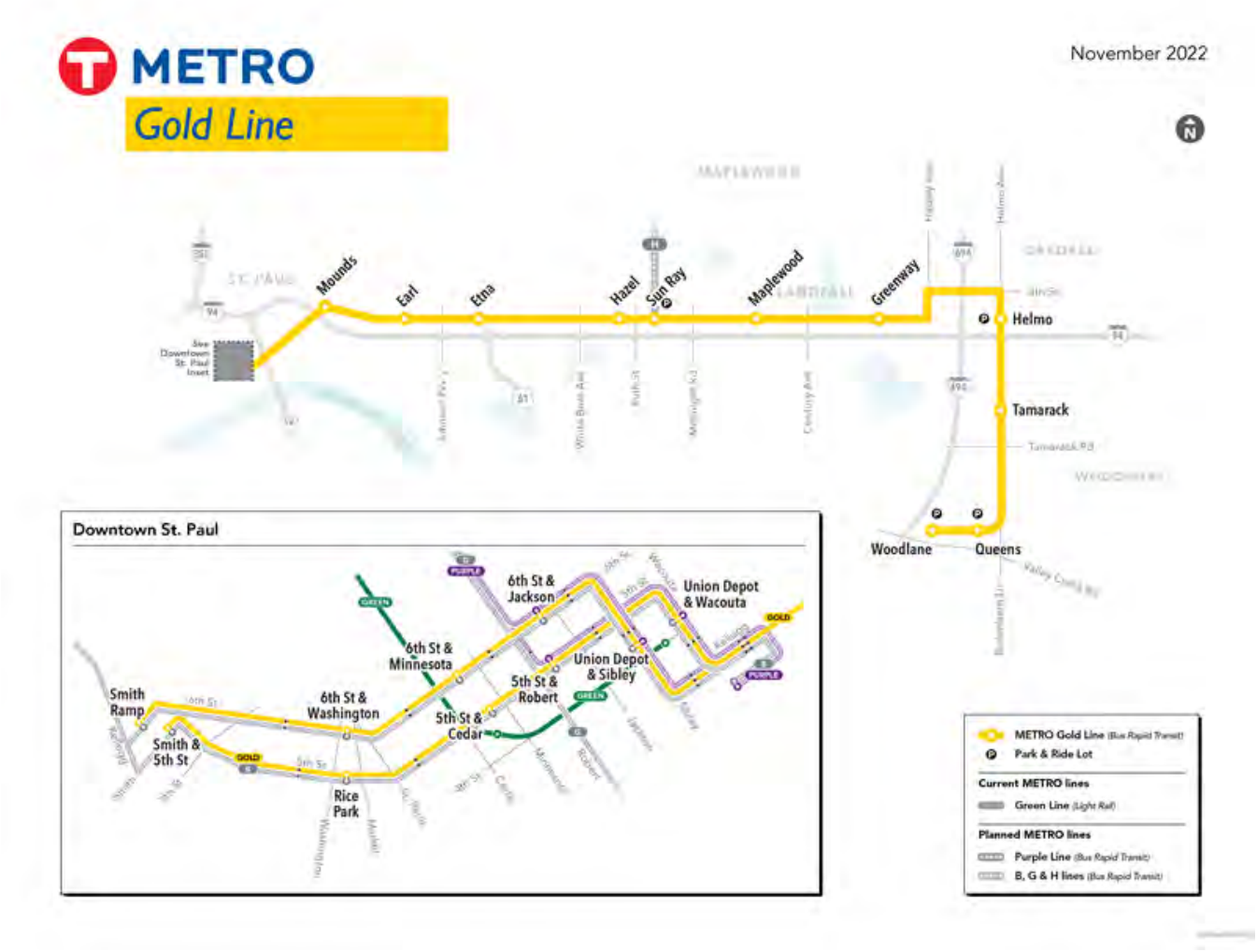
Service Plan

The Gold Line will operate between Smith and 5th Street in downtown Saint Paul and the Woodlane Park & Ride in Woodbury. The Gold Line will become the primary service in the corridor, running every 10 minutes on weekdays during morning rush hours, midday and afternoon rush hours and every 30 minutes in the evening and at night. On weekends it will operate every 15 minutes during the morning, midday, and later afternoon and every 30 minutes in the evening and at night.

As shown in Figure 1, the Gold Line will serve 16 enhanced station areas[1], 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 two blocks in downtown Saint Paul), while also allowing for most customers to access stations comfortably on foot.

[1] Shelters will provide comfortable waiting space and a variety of amenities: NexTrip real-time departure signs, maps, heat, lighting, bike racks, and enhanced security with cameras and emergency telephones.

Figure 1. METRO Gold Line Project Map



Source: Metro Transit

Local Service Changes

Metro Transit is proposing changes to other routes that operate within or connect to the Gold Line corridor, including Route 351 which will be discontinued. BRT stations are spaced approximately every half-mile, focusing on upgrading stops to stations where the greatest numbers of customers board buses today.

The Gold Line will operate between downtown Saint Paul (western terminal) and Woodlane Station (eastern terminal). METRO Gold Line service will largely replace service provided by Route 351 which will be discontinued, impacting connections to supporting local service lines. Table 1 lists the number of weekly scheduled transit trips under existing and proposed scenarios.

Table 1. Weekly Scheduled Trips by Route

Route	Existing*	Proposed	Change	%Change
Gold Line	-	1,198	1,198	100%
Route 351	30	0	-30	-100%

*"Existing" is representative of current conditions as of the August 2024 service pick.

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.

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.

Title VI was identified as one of several Federal laws that should be applied "to prevent minority communities and low-income communities from being subject to disproportionately high and adverse environmental effects."

To provide direction to recipients of federal funding, FTA issued Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients in 2012. 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.

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. This report references several elements from the current Title VI Program, approved by the Metropolitan Council in 2022.

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 (defined below. 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 "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.

Major Service Change Policy

Metro Transit's Major Service Change Policy is defined the 2023-2025 Metropolitan Council Title VI Program. Four criteria are included in the policy:

1. **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)**
2. **A new route in a new coverage area (minimum net increase of more than 3,500 annual inservice hours)**
3. **Restructuring of transit service throughout a sector or sub-area of the region as defined by Metro Transit**
4. **Elimination of a transit route without alternate fixed route**

A service change meeting any of these four thresholds qualifies at a major service change and requires an equity analysis.

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.

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.

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 policy 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 a 90 percent threshold, which states that there may be evidence of disparate impact if:

- *Benefits* are being provided to BIPOC populations at a rate less than 90 percent of the benefits being provided to white populations, or
- *Adverse* effects are being borne by white populations at a rate less than 90 percent 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 90 percent threshold suggests that a selection rate for any racial, ethnic, or gender group that is less than 90 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. 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 90 percent threshold for its disparate impact and disproportionate burden thresholds was subject to a formal public outreach process before being adopted by the Metropolitan Council in 2022. Prior to the 2022 policy update, 80 percent was the threshold. Additional information about the policies and their applications can be found in the Council's current Title VI Program.

Policies Applied to this Proposed Service Change

The proposed package of service changes evaluated in this report would introduce the METRO Gold Line and remove Route 351. The change in Route 351 service hours (100 percent) exceeds the Major Service Change threshold of 25 percent.

The proposed service change will increase 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 residents is less than 90 percent of the percent increase in the average number of weekly scheduled transit trips for white

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.

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. 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" matching the terminology used by the FTA.

Title VI Circular and other federal guidance

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 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 using other established measures that are at least as inclusive as those developed by HHS.

Correspondingly, this Title VI service monitoring analysis uses 185 percent of the 2018-2022 5-Year ACS U.S. 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.

The Metropolitan Council uses 185 percent 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.

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 or half mile/10-minute walk or roll from a transitway station) 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. This analysis considered only the routes intersecting the METRO Gold Line corridor outside downtown Saint Paul including those impacted by the proposed service changes: Route 63, Route 70, Route 74, Route 80, Route 219, and Route 323; as well as the Gold Line itself and Route 351. The existing/baseline service level network represents the conditions as of August 2024. The proposed service level network represents the conditions after the proposed Gold Line and Route 351 service changes are implemented in March 2025.[2]

[2] Due to an unrelated construction project (Kellogg/3rd Street Bridge), the Gold Line will open with a construction detour. Two planned stations will not be served from opening day until completion of construction (westbound at Sibley & 4th Street and eastbound Wacouta & 4th Street). The service plan evaluated here includes these stations as they are part of the official corridor route which is anticipated to be in effect within a year of opening day.

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 Gold 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.). Due to the large size of suburban census blocks, if a stop or station is located within a block it is also included in the analysis, even if the geographic center is not within the walk distance threshold.

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 aerial interpolation techniques to the 2018-2022 American Community Survey (ACS) 5-year Estimates.

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 percent, 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

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.

Figure 2. Formula for determining average percent change in service

$$Avg\ \%\ change\ in\ service = \frac{\sum(Population_i \times Percent\ Change_i)}{\sum Population_i}$$

Where:

$Population_i$ = Target population of census block *i*.
$Percent\ Change_i$ = Percent change in service levels for census block *i*

In this manner, the weighted percent change was calculated individually for the total population, 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 Gold Line and/or Routes 351,74, 63, 70, 80, 219, and 323. The service equity analysis is based on the impact to these residents. Areas with zero population are excluded from the analysis.

Figure 3. Distribution of BIPOC and white populations

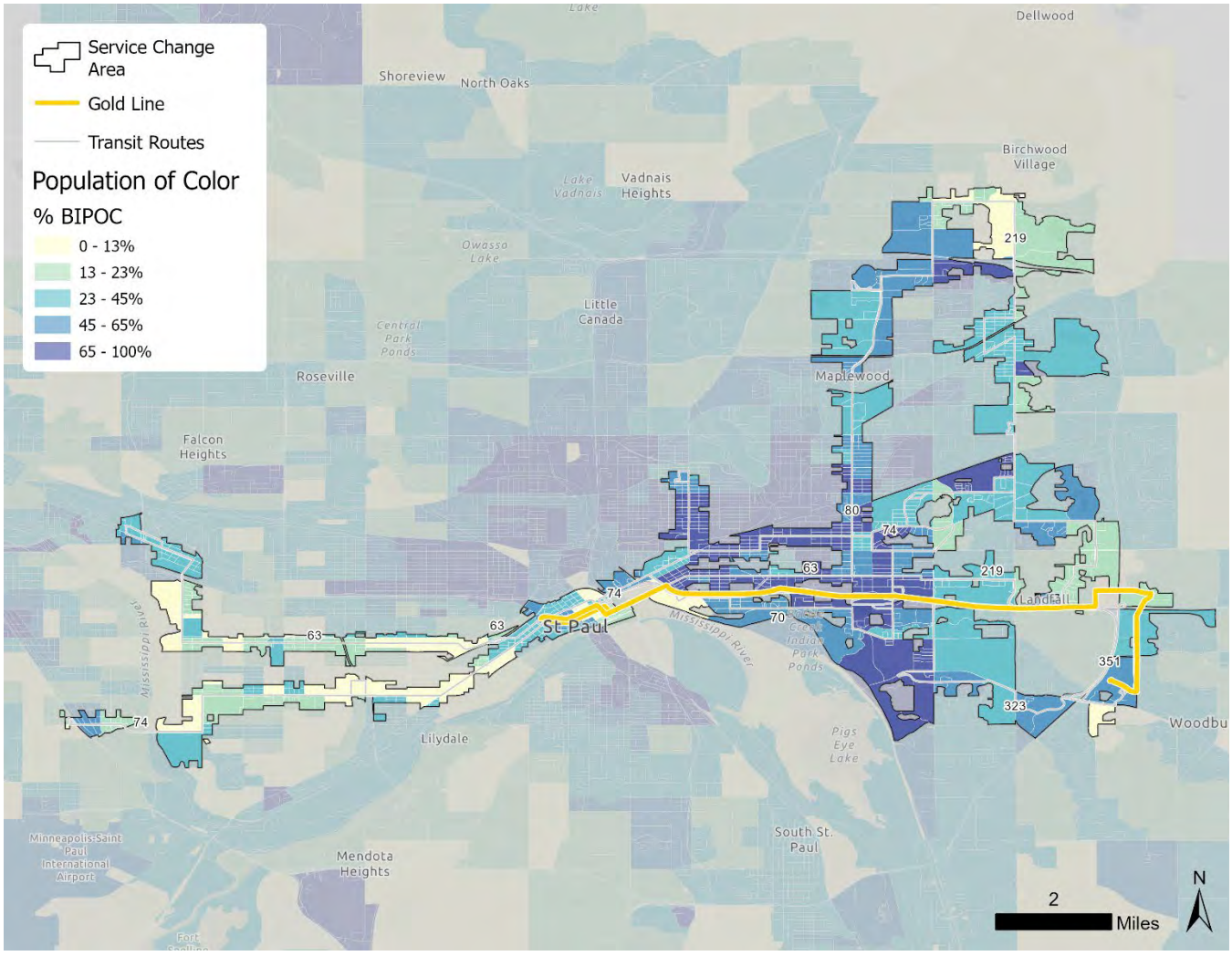
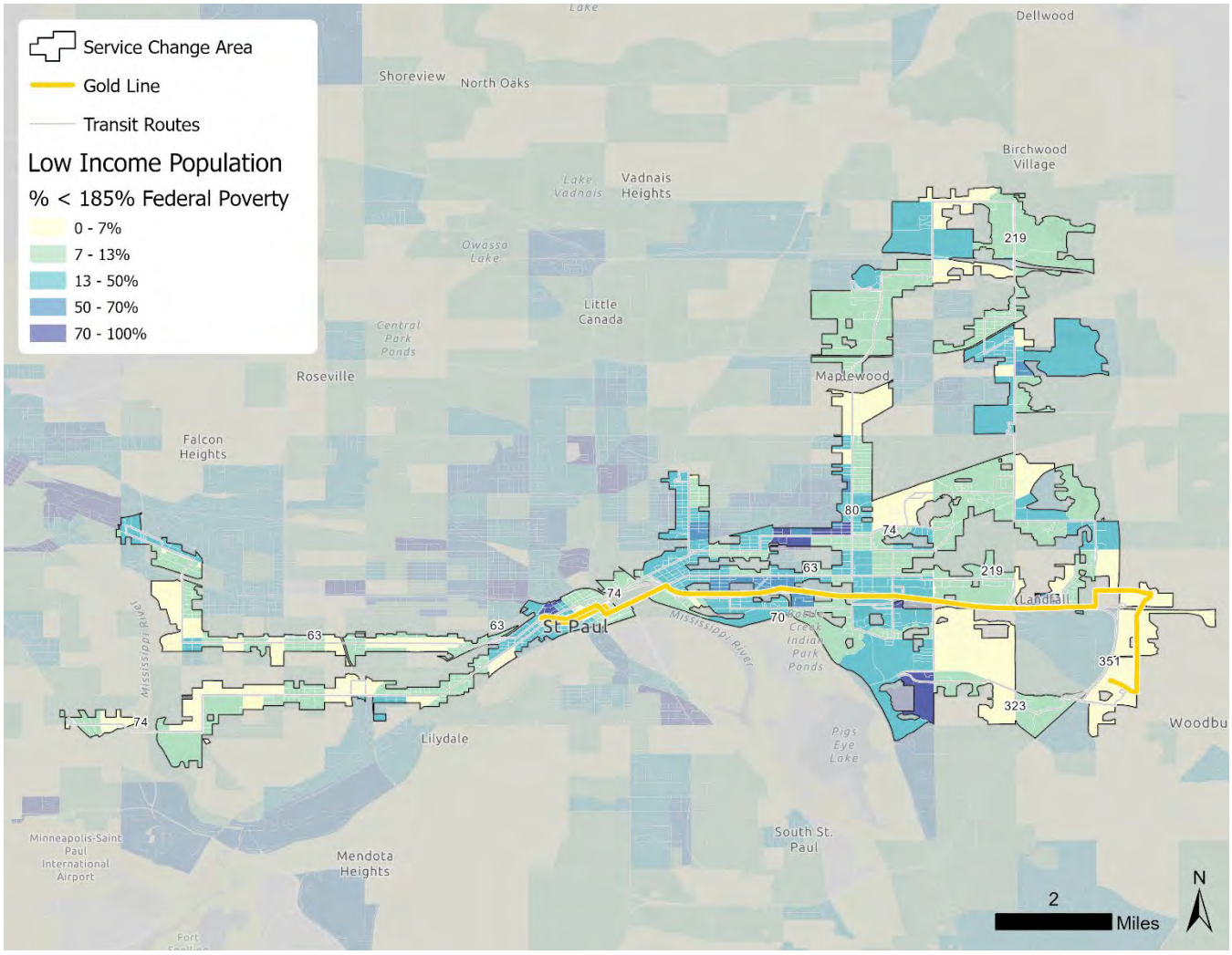


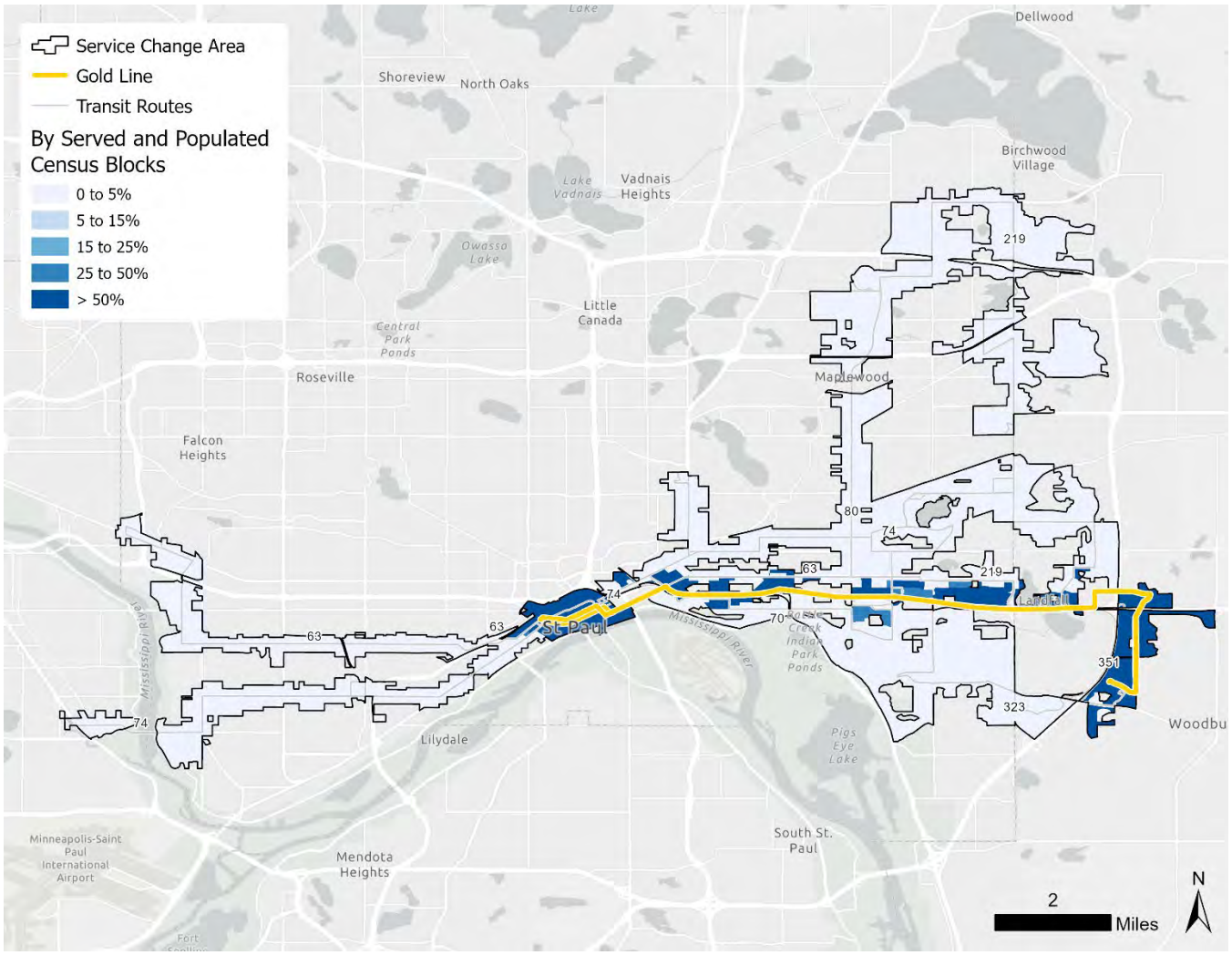
Figure 4. Distribution of low-income and non-low-income populations



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. Of the entire population in the service change area, 16.4 percent of the total population would receive an increase in weekly scheduled transit trips. Additionally, the proposed changes would not result in a service decrease for any of the population in the service change area.

Figure 5. Percent change in weekly service by census block



Average Percent Change in Service by Population Group

Table 2 summarizes the average percent change in service level for each target population group. On average, the proposed service changes associated with introduction of the Gold 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 14.6 percent increase in transit service after the proposed changes. The average BIPOC resident would experience a 14.7 percent increase, which is just slightly greater than the average for white resident, who would experience a 14.6 percent increase. Therefore, per Metro Transit's Title VI policies, this analysis identifies **no disparate impact on BIPOC residents** resulting from the proposed service changes of implementing the METRO Gold Line.

Table 2. Average percent change in service

Population Group	Average Percent Change in Service	Affected Population
Black, Indigenous, and People of Color	14.7%	54.600
White non-Hispanic	14.6%	64,400
Disparate Impact Comparison Index[1]	1.0	-
Low-Income	17.0%	32,600
Non-Low-Income	14.1%	82,700
Disproportionate Burden Comparison Index[2]	1.2	-
Total Population	14.6%	119,000

The average low-income resident in the service change area would experience a 17.0 percent increase in transit service after the proposed changes (Table 2). This service increase is greater than that for the average for non-low-income individual, who would receive a 14.1 percent 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 associated with the METRO Gold Line implementation.

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 Gold Line in March 2025, alongside the proposed discontinuation of Route 351.

This analysis reviewed the percent change in weekly scheduled transit trips resulting from the proposed service changes. Results indicate about 16 percent of residents in the service change areas would receive an increase in service.

On average, BIPOC residents would benefit slightly more than white residents (14.7 percent increase in weekly service vs. 14.6 percent), and low-income residents would benefit more than non-low-income residents (17.0 percent increase in weekly service vs. 14.1 percent) [Table 2].

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**.

Committee Report

Transportation Committee

Committee meeting date: August 11, 2025 **For the Metropolitan Council:** August 27, 2025

Business Item: 2025-178

Northstar Commuter Rail Suspension and Replacement Service Plan

Proposed action

That the Metropolitan Council authorize the suspension of Northstar Commuter Rail service pursuant to all applicable contracts, agreements, easements, and licenses, and approves enhanced bus service serving the Northstar Corridor within the seven-county Metropolitan area to be incorporated in Network Now.

Summary of Transportation Committee discussion/questions

Metro Transit Service Development Director Adam Harrington presented this item.

Chamblis asked about the plan for Big Lake and Elk River replacement bus service. Harrington stated that MNDOT has the authority to provide bus service in Sherburne County and Metro Transit staff are working with MnDOT on what kind of service replacement options there might be for those two areas; Sherburne County is also interested. Chamblis asked about the Northstar Link. Harrington stated it is a bus service that was introduced after 2010 and connects from the Big Lake station to St. Cloud carrying approximately 25 riders each direction. Harrington continued that this service is ran by St. Cloud Metro Bus and it's not believed that they will pursue continuing that service.

Obisakin asked how much insurance cost would increase. Harrington stated it would increase about $400,000 a year or more starting in 2026. Obisakin asked for approximate operating cost for bus service compared to the $18.6 million per year for Northstar Commuter Rail service. Harrington stated that the enhanced bus would cost approximately $3.5 million per year.

Johnson stated that the pre-pandemic ridership numbers (2,660 average weekday rides) weren't even close to the original projections (5,590 average weekday rides). Johnson supports the enhanced bus service plan, and encourages dialogue with Sherburne County and MNDOT to develop a bus service.

Johnson and Chair Barber expressed understanding with the difficulty with this decision, and the impacts on people who use Northstar.

Several Council members noted that it was a difficult but correct decision to move this item forward.

Motion by Johnson, was seconded by Carter, Tyronne. Motion carried.

Business Item

Transportation Committee

Committee meeting date: August 11, 2025 **For the Metropolitan Council:** August 27, 2025

Business Item: 2025-178

Northstar Commuter Rail Suspension and Replacement Service Plan

District(s), member(s): District 2, Councilmember Reva Chamblis
District 7, Councilmember Yassin Osman
District 9, Councilmember Diego Morales

Policy/legal reference: Procedure 2-2; 2-2e Public Involvement in Transportation Service Changes and Restructuring; Minnesota Statute 473.121, subd. 2; 174.90

Staff prepared/presented: Lesley Kandaras, Metro Transit General Manager
Adam Harrington, Director, Service Development
Craig Lamothe, Director, Northstar Transition
Jonathan Ahn, Assistant Director, Service Development
Ryan Heath, Manager, Service Development

Division/department: Metro Transit, Service Development

Proposed action

That the Metropolitan Council authorize the suspension of Northstar Commuter Rail service pursuant to all applicable contracts, agreements, easements, and licenses, and approves enhanced bus service serving the Northstar Corridor within the seven-county Metropolitan area to be incorporated in Network Now.

Background

Northstar Commuter Rail ("Northstar") service began in 2009 operating between Big Lake and Target Field Station near Downtown Minneapolis. Big Lake and Elk River are outside the Council's statutory operating area for regular transit service – Minnesota Statutes, section 473.121, subd. 2; and section 473.123, subd. 1. Commuter rail service to these communities is authorized under Minnesota Statutes, section 174.90; and section 473.4057 subd. 2.

Northstar is a rush-hour, commuter-oriented service. Prior to the COVID-19 pandemic, it operated 12 daily trips on weekdays and six daily trips on weekends. Today, it operates four trips per direction on weekdays, three peak-direction trips and one reverse-commute trip. Limited service is provided for downtown events, such as Twins games at Target Field. Under the Council's contract with BNSF Railway, midday and evening trips are prohibited, limiting options to expand and adapt Northstar service to current travel patterns.

Prior to the pandemic, Northstar Commuter Rail served 2,660 average weekday riders, less than half of the projected 2025 ridership. Ridership was reduced approximately 95% by the pandemic. During the first half of 2025, average daily ridership remained below 500. The 2023 subsidy per ride was $116.60, compared to $16.07 for commuter express bus service in 2023.

The high cost of the service and decline in market lead to developing a bus service alternative which was the subject of public engagement during April-May 2025. Four public meetings were held, and 1,455 comments were received. Many riders accessing Big Lake and Elk River stations

do not favor discontinuing service at those stations, downtown commuters preferred increase in service during rush hour and midday.

Metro Transit recommends suspension of Northstar Commuter Rail service and replacing it with enhanced bus service within the seven-County Metropolitan Area. Under state statute, the Council cannot operate bus service to Big Lake and Elk River. MNDOT has authority to provide service outside of seven-county Metropolitan area.

Replacement Service Plan

Service to the cities of Ramsey, Anoka, and Coon Rapids will be provided by the new all-day express bus Route 888 providing 30-minute peak direction and hourly bidirectional service on weekdays from approximately 5 am to 7 pm. Sixteen trips per direction per weekday will be provided, a 400% increase over current Northstar service levels and a 266% increase over pre-pandemic service. Route 889 will provide three trips per direction on Saturdays, Sundays, and holidays. These trips are timed to serve mid-day and evening events in Downtown Minneapolis.

Service to Fridley will be provided by Route 827, currently operated as Route 852. Route 827 replaces the existing Route 852, serving Fridley Station and operating via East River Road to downtown Minneapolis every 30 minutes rush hour and hourly midday on weekdays, hourly on Saturdays. Fridley Station is also adjacent to University Avenue served by Routes 10 (future METRO F Line) and 824.

Both Routes 888 and 827 will serve the Marquette and 2nd Avenues in downtown Minneapolis, removing need to transfer to get to the downtown core. Northstar corridor customers who travel beyond downtown would have many connections, including major transitways such as Blue, Green, and Orange Lines, and C and D Lines.

Public engagement

The proposed commuter rail to bus service transition plan was subject of public meetings attended by more than 175 people:

In-person:

- Tuesday, April 29, 5 p.m. to 7:00 p.m., Anoka City Hall
- Wednesday, May 7, 4:30 p.m., Onboard northbound train Target Field Station
- Thursday, May 8, 5:00 p.m. to 6:30 p.m., Mississippi Library, Fridley

On-line:

- Wednesday, April 30, 5:30 p.m. to 6:30 p.m.

1,455 responses to on-line and paper surveys were collected and informed adjustments to recommended bus service schedule start and end times, and addition of weekend service.

Title VI Analyses

Title VI requires the Council to analyze major service changes for potential disparate impact and disproportionate burden (DI/BD). The analyses calculate the number of transit trips available and the change in fare to the **residents home location** in the affected corridor. The results indicate that there is potential for DI/BD due to the proposed service changes.

According to Council policy OEEO 6-2, if DI/DB if found, “the FTA requires recipients to analyze alternatives… 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.”

This Title VI analysis methodology evaluated routes specific to the Northstar commuter rail to bus transition, and includes new service on East River Road. New East River Road service was included in the Network Now system wide evaluation showing no disparate impact or disproportionate burden. The analysis does not account for change in market demand (midday

service), travel time, service reliability or vehicle type changes. The proposed service plan aims to provide an increase trip offering and all day, while travel times may be slower for some customers, and the ride quality different. Therefore, staff recommends implementation of the recommended plan.

Fiscal Impact

Suspend Northstar operating budget of $18.6 million (2025).

Routes 888 and improvements to Route 827 (former Route 852) will result in new operating costs of approximately $3,500,000 in 2026.

The net operating impact will be a long-term reduction in annual operating costs.

Rationale

Suspending Northstar Commuter Rail and replacement by enhanced bus service allows the Council to end a high-subsidy, low-ridership service with an expanded service better suited to current travel patterns.

Thrive lens analysis

On Feb. 12, 2025, the Council adopted Imagine 2050, which builds on policy direction in Thrive MSP 2040. Under the Thrive lens, the proposed action supports **Stewardship** by suspending a high-subsidy, low-ridership service and providing additional service at a reduced cost and **Prosperity** by replacing a peak-only, commuter-focused service with all day, bidirectional service.

Funding

Operating funding for Routes 888 and 827 will be provided out of Metro Transit's existing bus operating budget.

Small business inclusion

There are no direct impacts to small business with this action.

BI2025-178: Northstar Commuter Rail Suspension and Replacement Service Plan

Adam Harrington | Director, Service Development

Proposed Action

- That the Metropolitan Council authorize the suspension of Northstar Commuter Rail service pursuant to all applicable contracts, agreements, easements, and licenses, and approves enhanced bus service serving the Northstar Corridor within the seven-county Metropolitan area to be incorporated in Network Now.

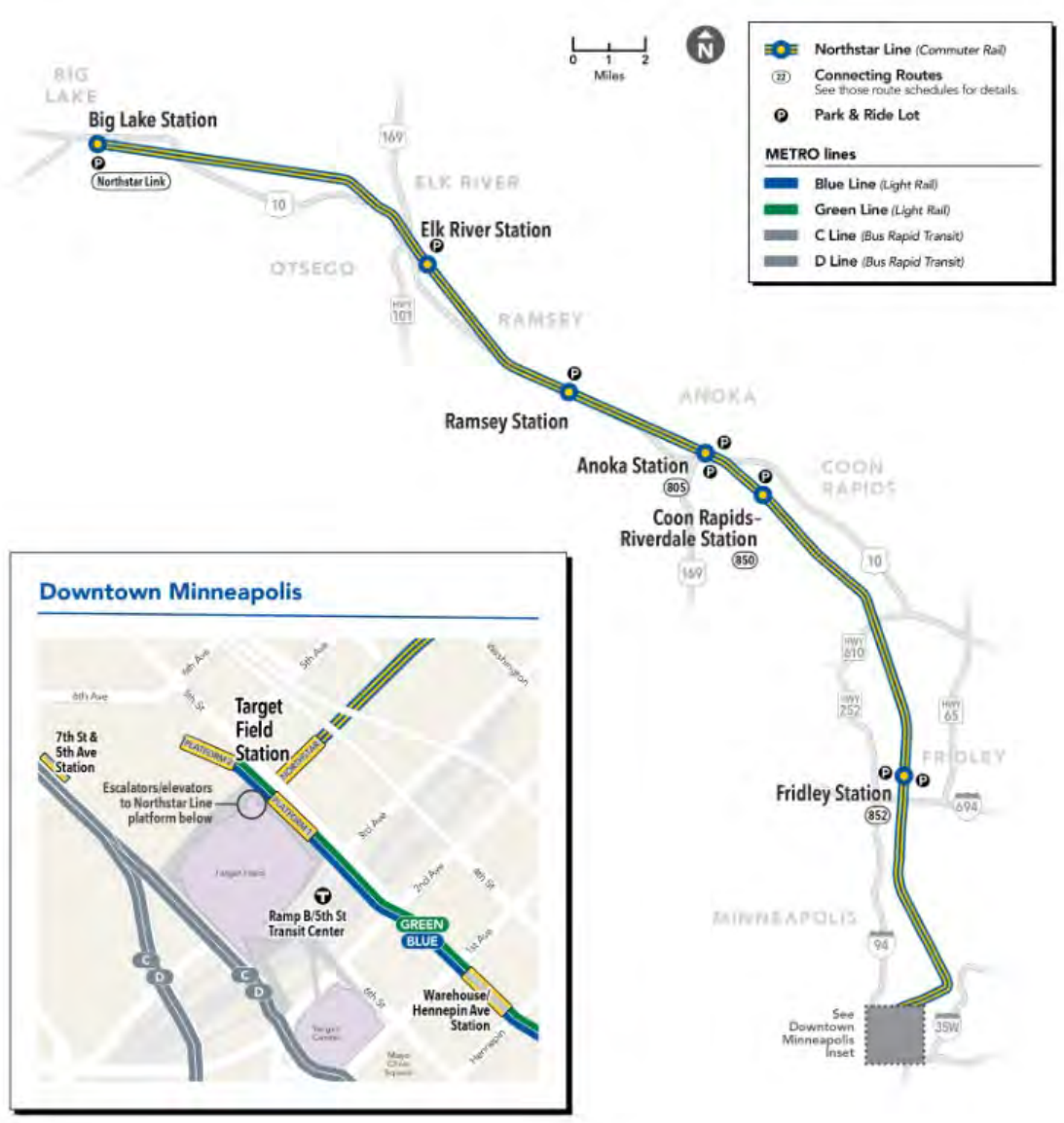
Northstar Background

- Ridership
  - Pre-pandemic: maximum of 2,660 average weekday rides
  - 2024: 430 average weekday rides
- 2023 subsidy per ride: $116.60 vs $16.07 for commuter bus
- 2025 operating budget: $18.6M
  - Not including insurance and capital expenditures

Northstar Service Levels

	Weekday	Weekend
Pre-COVID	12 daily trips	6 daily trips
2020-2023	4 daily trips	0 trips
2023-Present	8 daily trips	Special Events only

- Weekday rush hour only
- One reverse-commute trip
- Special events (Twins, Vikings, Concerts)
- Service levels constrained by BNSF contract
  - No regular midday or evening trips
  - Limited options for changing travel patterns



Network Now – framework for service improvements through 2027

40% **more** transit service

27% increased access to jobs

70+ routes will have frequency or span improvements

26 routes will have 15 minute or better service

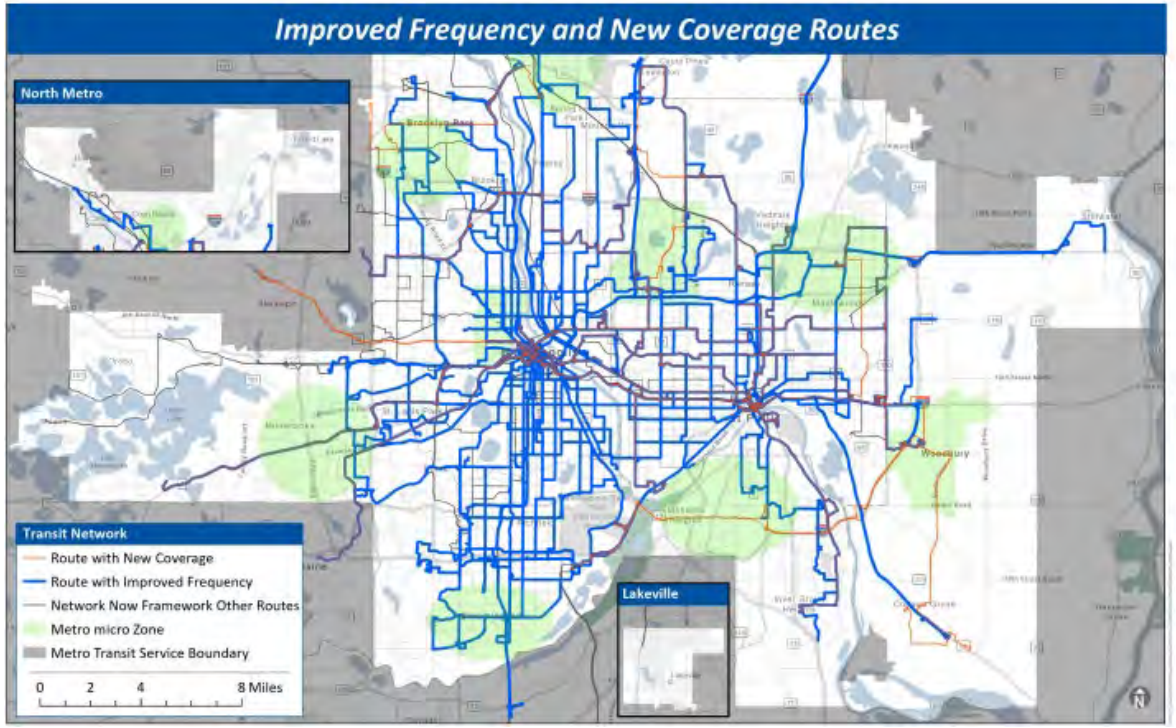
LRT service will be back to **10-minute frequency**

8 **new micro zones** and routes with new coverage will be operating

50 routes officially discontinued and the resources reinvested into other service

12 suspended routes will be restored, among other improvements

More options for **greener travel** as people reduce their carbon emissions by choosing transit



Network Now engagement 2024

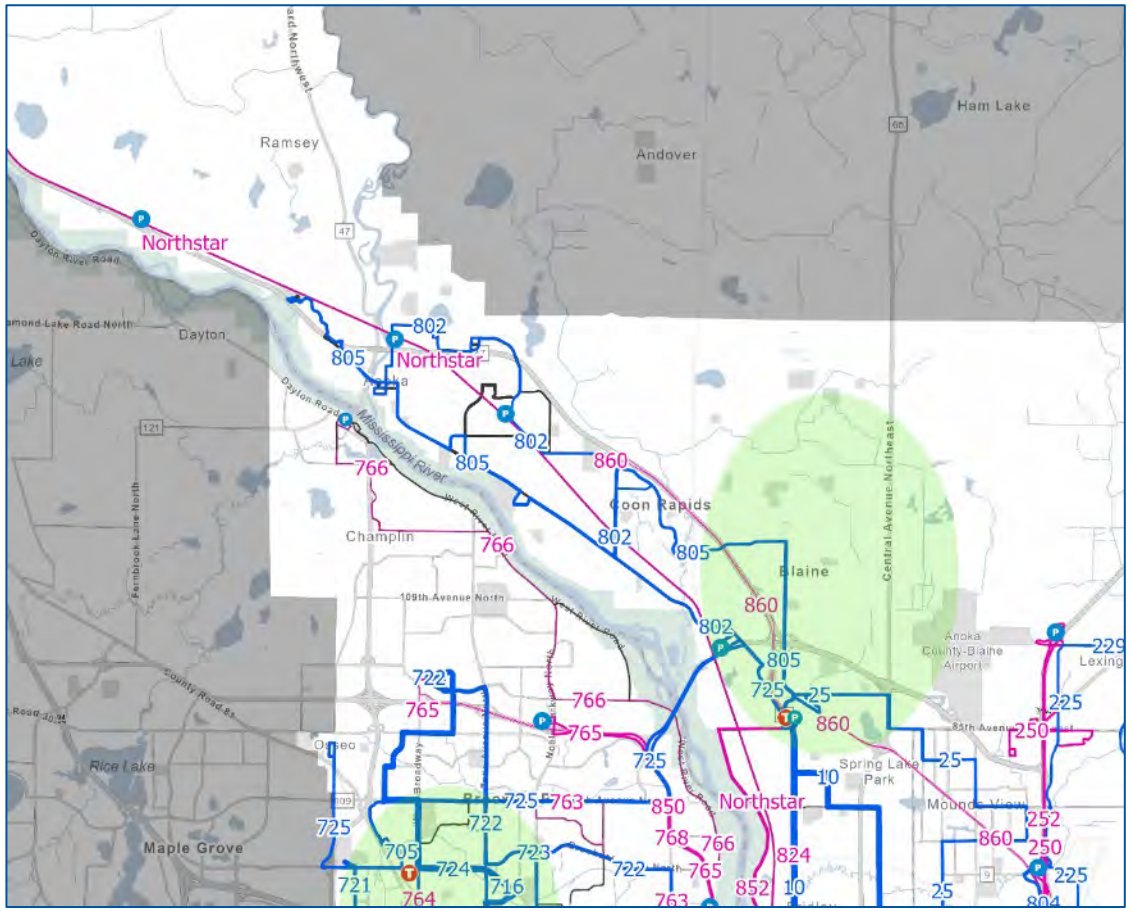


- 25 community events
  - Includes events held primarily in other languages
- 35 municipal and county public briefings
- 15 committee and other presentations
- 150 hours of onboard and transit center intercept work with material handed to over 2,000 customers
- Great Day In Transit: 65 ambassadors working 270 hours shared Network Now information, interacting with 20-50 people per shift
- Rider alerts, interior cards, newsletters, social media, partner collaboration and more

2024 Network Now Engagement - what we heard from Anoka County/communities

- Shared plans and invited meetings with each city
- Met with Blaine staff, Anoka County Transportation Commission
- Community event and listening session at Northtown
- 151 comments related to Anoka County service
  - 39 Northstar comments
  - More bus express and Northstar frequency, all day service, extend to St. Cloud
  - Local connections via Rt 805

Network Now Framework (endorsed March 2025)





March 2025 begin Northstar transition planning

- Metro Transit constrained to Metro Area by Statute (7-county)
- MNDOT authority to provide service outside Metro Area
- Develop service concept for Route 827 and 888
  - Ramsey, Anoka, Coon Rapids, Fridley, downtown Minneapolis
  - 30-minute rush hour
  - Hourly all day
- Community engagement

Northstar bus transition engagement April-May 2025

- Survey open April 10-May 11
  - 1,455 responses
  - 23 written (paper) comments
- Four public meetings held, over 175 attendees
  - Two in-person (Anoka, Fridley)
  - One virtual
  - One onboard



Response to Alternative Bus Service (Likelihood and timing)

- Many of the people that responded have more traditional commuter hours (but not all) or only use special event service
  - Those that use Northstar most often tend to have more consistent schedules
- 46% of daily riders are **more likely** to use service every 30 minutes between 6-8:30 a.m. and 4-6:30 p.m.
- Hourly bus service 8:30 a.m.-4 p.m.
  - 33% of riders **not likely at all to use**
  - More than 50% riders somewhat likely to use
- 70% of daily riders would need to **arrive in downtown Minneapolis between 6-8:30 a.m.**
  - For those that use Northstar sometimes or not at all 44% need to be downtown during that time range

Enhanced bus service 2026

New Route 888

Coach bus serving Ramsey, Anoka, Coon Rapids stations and Minneapolis

Weekdays

Direction	Time Period	Frequency
Southbound (Inbound)	Before 6 am	1 trip
	6:30 am – 8:30 am	30”
	9 am – 6 pm	60”
Northbound (Outbound)	6 am – 4 pm	60”
	4 pm – 6 pm	30”
	After 6 pm	2 trips

Saturday and Sundays

3 trips inbound: 10:30 am, 12:30 pm, 5:30 pm
3 trips outbound: 2 pm, 7 pm, 11 pm





Enhanced bus service 2026

Route 827 (replace current Route 852)

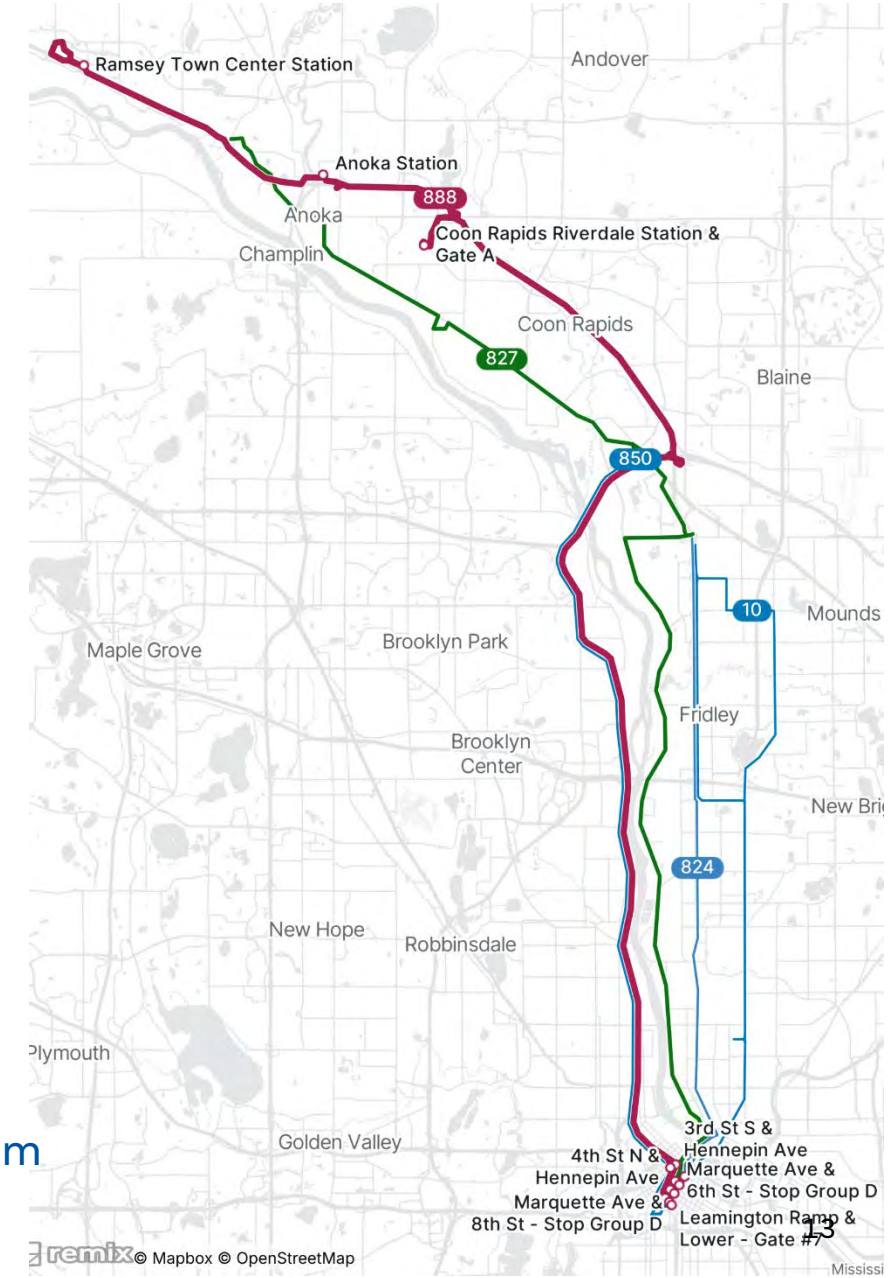
Limited stop bus serving Fridley Station @ East River Road to Minneapolis

Weekdays

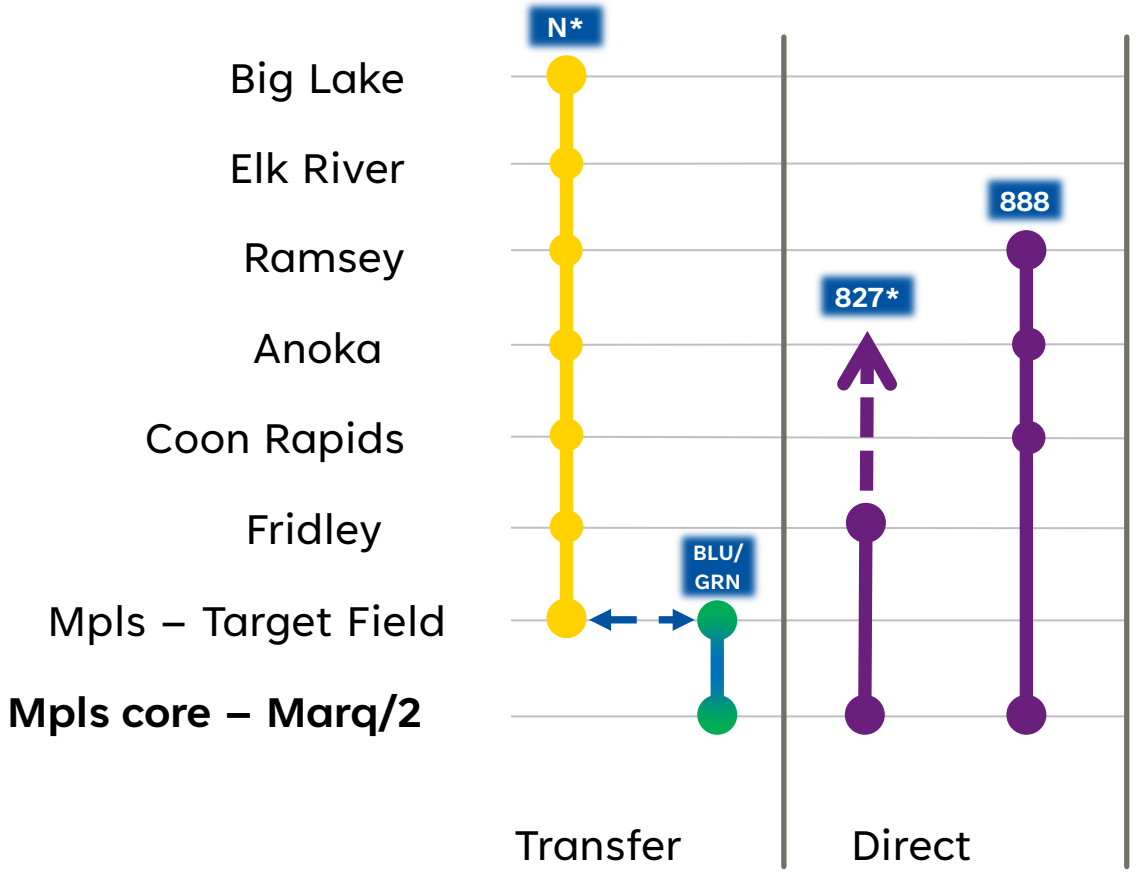
Direction	Time Period	Frequency	
Southbound Weekday (Inbound)	6 am – 9 am	30”	Northtown-downtown
	9 am – 9 pm	60”	
Northbound Weekday (Outbound)	5 am – 3 pm	60”	
	3 pm – 6 pm	30”	Downtown-Northtown
	After 6 pm	3 trips	

Saturday

Inbound: hourly 8:45 pm – 6:45 pm; Outbound: hourly 9:30 am – 7:30 pm



Service Comparison



Travel time comparison

Origin Station	Northstar-LRT to 5th & Nicollet	Bus to 5th & Nicollet
Ramsey	45 minutes	63 minutes
Anoka	42 minutes	49 minutes
Coon Rapids-Riverdale	39 minutes	41 minutes
Fridley	29 minutes	33 minutes

Connections improved

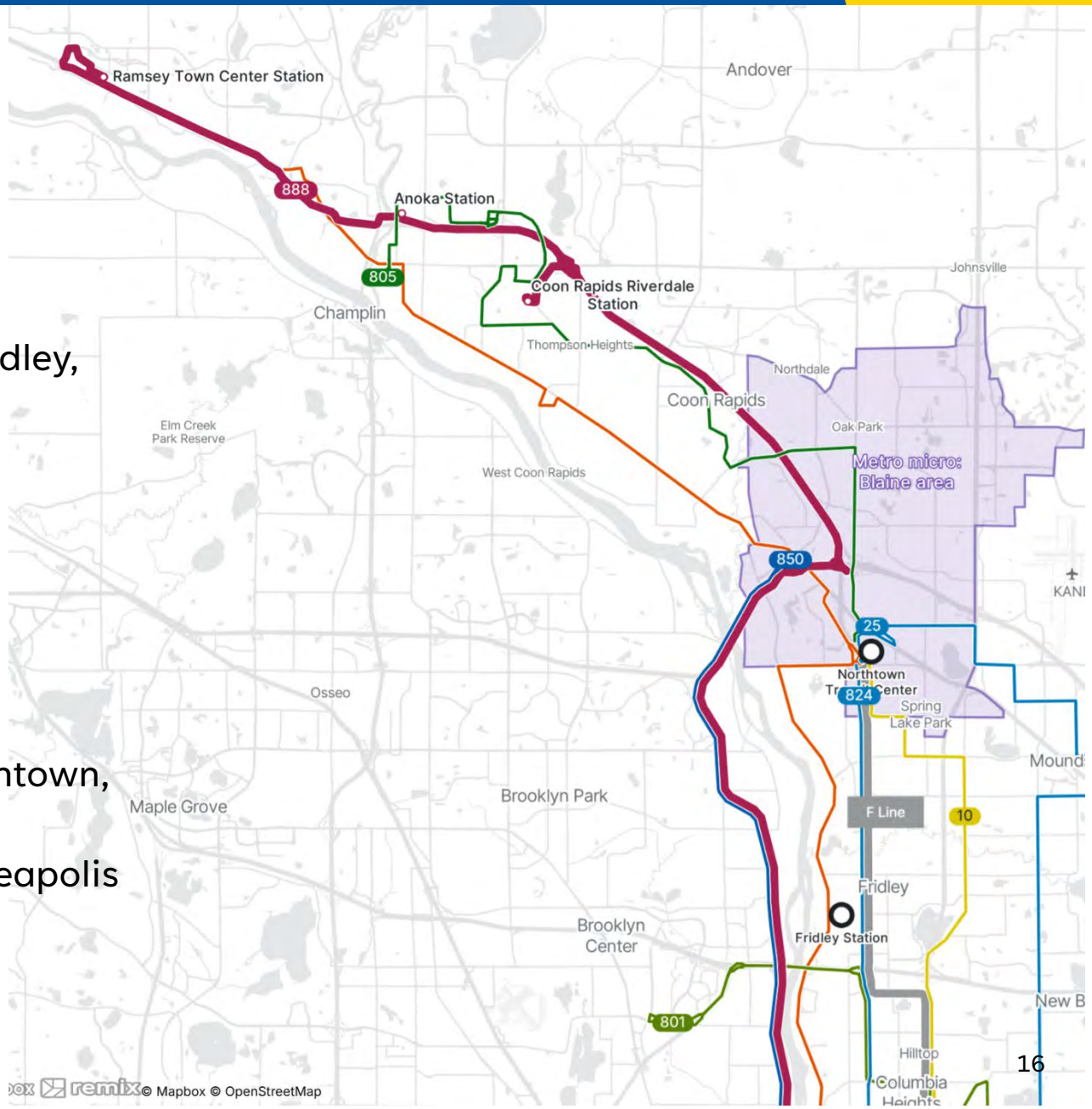
- Nicollet Station - Blue & Green Lines
- Marq/2 – Orange, 645
- 7th/8th Streets – C, D, 5, 9, 14, 22, 94

Rail to bus service comparison

	Current rail schedule	Planned bus schedule
Weekdays	8 trips per weekday • 3 southbound AM • 3 northbound PM • 2 reverse trips, one AM and one PM	**Route 888** (Ramsey, Anoka, Coon Rapids, Minneapolis) • 16 southbound 5:00 am – 6:00 pm • 16 northbound 6:00 am – 7:00 pm **Route 827** (Fridley, Minneapolis) • 18 southbound 6:00 am – 9:00 pm • 19 northbound 5:00 am – 8:00 pm
Weekends	None, except special events	**Route 888 Saturday & Sunday** • 3 southbound 10:30 am – 5:30 pm • 3 northbound 2:00 pm – 11:00 pm **Route 827 Saturday** • 11 southbound 8:00 am – 6:00 pm • 11 northbound 9:30 am – 7:30 pm
Weekly total	40 trips	379 trips

Planned bus service

- 2025
  - Route 805 Anoka-Riverdale-Northtown
  - Route 852 Anoka, Coon Rapids, Northtown, Fridley, Minneapolis
  - Route 850 Coon Rapids-Minneapolis
  - Route 860 Anoka, Coon Rapids, Northtown, Moundsview, St. Paul
  - Metro Micro
- 2026 **Enhanced service**
  - Route 827 (old 852) Anoka, Coon Rapids, Northtown, Fridley, Minneapolis
  - Route 888 Ramsey, Anoka, Coon Rapids, Minneapolis
- Transit Link across Anoka County

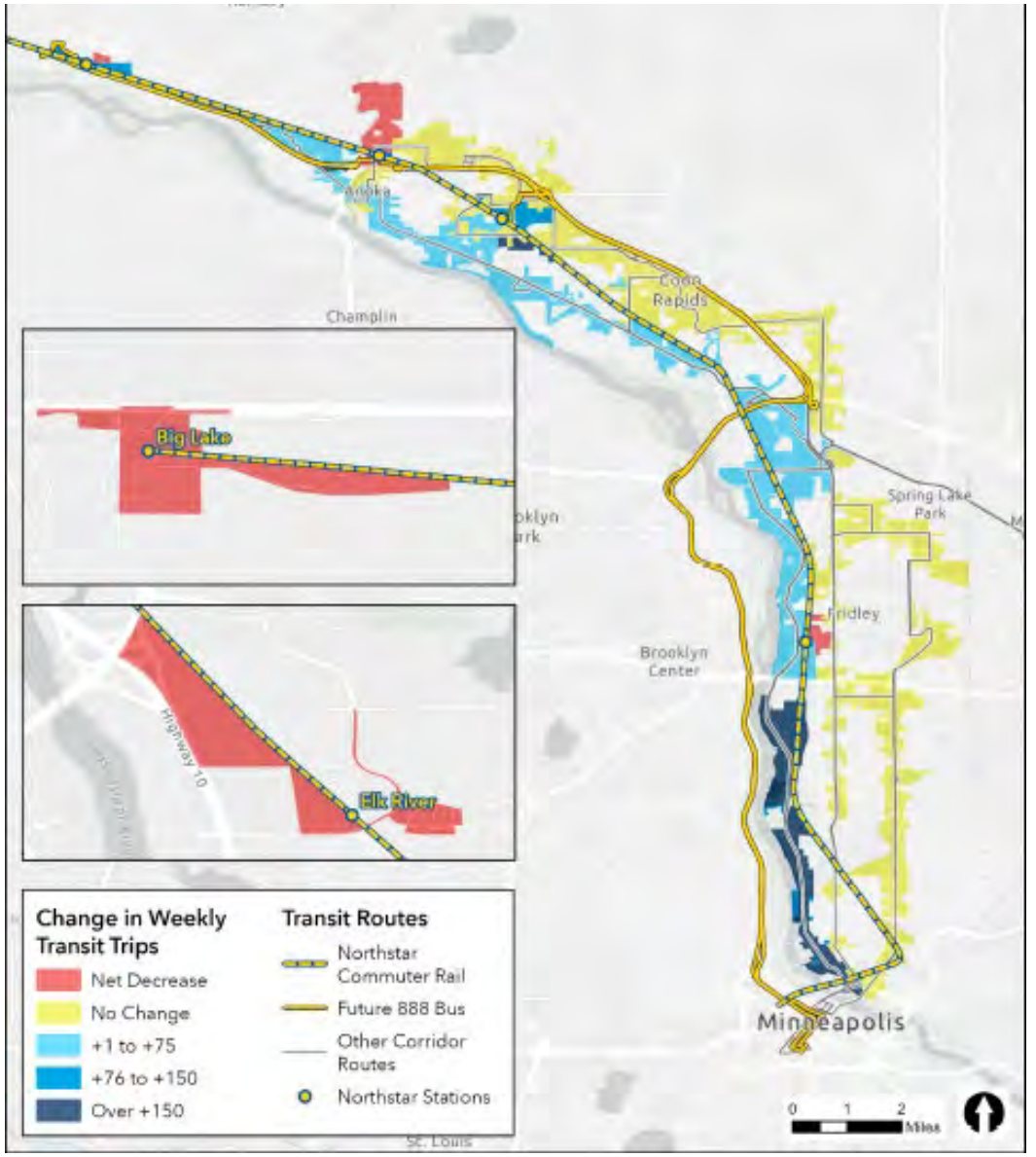


Title VI Analyses

- Federal law requires transit agencies to show they are not discriminating when providing transit service or changing fare.
  - Council's **Disparate Impact & Disproportionate Burden (DI/BD)** policy requires analysis of impacts by race and income (i.e. BIPOC and non-BIPOC, Low Income and Non-Low Income)
- Service Equity Analysis (SEA): change in number of scheduled trips available nearby to average resident in corridor
- Fare Equity Analysis (FEA): average change in fare to passengers
- Analyses do not consider mode, vehicle size/amenities, park-and-ride access, travel time

Title VI Results

- Service Equity Analysis
  - Service increase East River Rd/Marshall
  - Customer survey reflects Rt. 852 (future Rt. 827) ridership is 43% BIPOC and 63% low income.
  - East River Rd service included in Network Now, system wide improvements



Title VI Results

- Service Equity Analysis: potential DI/DB
  - Trip availability/residential area increased more for non-low income and non-minority populations.
- Fare Equity Analysis: potential DB
  - Lower fares for long-distance passengers benefit non-low income riders
- Recommendation: Proceed with service change

	DI Index		DB Index	
	# Trip Change	% Trip Change	# Trip Change	% Trip Change
SEA	0.71	0.78	0.82	0.84
	High Level	Fare Media	High Level	Fare Media
FEA	1.82	1.50	0.87	0.76

Potential DI/DB if index <0.9

Proposed Action

- That the Metropolitan Council authorize the suspension of Northstar Commuter Rail service pursuant to all applicable contracts, agreements, easements, and licenses, and approves enhanced bus service serving the Northstar Corridor within the seven-county Metropolitan area to be incorporated in Network Now.

Thank You!

Adam Harrington

Adam.Harrington@metrotransit.org

Title VI Northstar Transition Analysis

Service and Fare Changes Accompanying a Transition from Rail to Bus Service

August 2025

Metro Transit

Prepared by:

SRF

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, Metro micro, Metro Move, 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.

TABLE OF CONTENTS

Executive Summary **6**

Chapter 1: Introduction **9**

Report Purpose 9

Federal Requirements 9

Proposed Service Changes 9

Proposed Fare Changes 10

Chapter 2: Title VI Principles and Definitions **13**

Title VI and Environmental Justice 13

Requirement to Conduct Equity Analyses 14

Discrimination, Disparate Impact, and Disproportionate Burden 14

Title VI Definitions of Minority and Low-Income Populations 16

Chapter 3: Analysis Methodology **18**

Service Equity Analysis 18

Fare Equity Analysis 23

Chapter 4: Evaluation of Impacts from Service Changes **28**

Percent Change in Service Levels 28

Absolute Change in Service Levels 31

Discussion 33

Chapter 5: Evaluation of Impacts from Fare Adjustments **34**

High-Level Analysis 34

Fare Medium Analysis 34

Analysis Restricted to Metro Transit Service Area 35

Discussion 36

Chapter 6: Conclusions **37**

Service Equity Analysis 37

Fare Equity Analysis 37

Discussion 38

TABLE OF FIGURES

Figure 1. BIPOC Population in the Northstar Corridor 20
Figure 2. Low-Income Population in the Northstar Corridor 21
Figure 3. Formulas for Determining Average Percent and Absolute Changes in Service 22
Figure 4. Percent Change in Service by Census Block, Proposed vs. Current 30
Figure 5. Absolute Change in Service by Census Block, Proposed vs. Current 32

TABLE OF TABLES

Table 1. Current and Proposed Regular Adult Fares 11
Table 2. Current and Proposed Mobility Fares 11
Table 3. Current and Proposed Youth/Senior Fares 12
Table 4. 2022 Department of Health and Human Services Poverty Guidelines in Dollars 17
Table 5. Onboard Survey Variables Applicable to Analysis 24
Table 6. Linked Trips by Fare Combination 25
Table 7. Fare Medium Onboard Survey Records 26
Table 8. Linked Trips by Fare Medium, Fare Type, and Demographic Status 27
Table 9. Average Percent Change in Service: Proposed vs. CurrentGroup 28
Table 10. Average Absolute Change in Service: Proposed vs. Current 31
Table 11. Average Change in Fare Comparison - High-Level Analysis 34
Table 12. Average Change in Fare Comparison - Fare Medium Analysis 35
Table 13. Average Change in Fare Comparison – Excluding Big Lake and Elk River 35
Table 14. Service Change Impacts 37
Table 15. Fare Change Impacts 38

EXECUTIVE SUMMARY

Metro Transit is proposing to suspend Northstar commuter rail service connecting downtown Minneapolis to Big Lake, Minnesota in response to low ridership levels combined with a relatively high cost to operate the service. Prior to service suspension, in accordance with Metro Transit's Title VI policy, changes to both service and fare must be reviewed for disparate impacts on Black, Indigenous, or people of color (BIPOC) residents or disproportionate burdens on low-income residents.

Proposed Service Changes

Metro Transit is proposing to transition from rail to bus service in the Northstar commuter rail corridor. Service changes in the corridor are expected to serve demand for transit more efficiently and effectively. The proposed changes are summarized as follows:

- Northstar commuter rail would suspend operations.
- Northstar commuter rail service would be replaced by Route 888, a new all-day express bus route serving the Ramsey, Anoka, and Coon Rapids-Riverdale stations.
- Route 852 would be renumbered as Route 827 and modified south of Interstate 694 to serve limited local stops on East River Road and Marshall Street.
- The Elk River and Big Lake stations would not be served by replacement Metro Transit bus service due to statutory limitations on locations that can be served by Metro Transit buses.

Proposed Fare Changes

To maintain consistency with its systemwide fare structure, Metro Transit also proposes changes to fares paid by riders in the Northstar corridor. Northstar currently uses a zone-based fare system with surcharges based on distance travelled. Passengers boarding in Big Lake and travelling to downtown Minneapolis pay the highest fare ($6.25) while passengers boarding in Fridley pay the lowest fare ($3.25). Current Route 852 has variable fares depending on boarding and alighting location. Trips entirely north or entirely south of Interstate 694 are paid as local fare ($2.00). Trips continuing downtown are paid as express fare ($3.25).

The proposed changes to fare structure are as follows:

- Future Route 888 would operate as a regular commuter express bus with a $3.25 peak fare/$2.50 off-peak fare.
- Future Route 827 would operate as a regular local bus with a flat $2.00 fare.

Framework for Evaluating Impacts

For Title VI service change and 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 a

10 percent difference between demographic groups, meaning that there may be evidence of disparate impact if:

- Benefits are being provided to BIPOC populations at a rate less than 90 percent of the benefits being provided to non-BIPOC populations, or
- Adverse effects are being borne by non-BIPOC populations at a rate less than 90 percent of the adverse effects being borne by BIPOC populations.

Metro Transit uses the same framework when evaluating whether low-income populations will experience disproportionate burden relative to the impacts on non-low-income populations.

Service Equity Analysis

A geographic information systems (GIS)-based approach was used to measure the location and magnitude of service changes and compare the distribution of impacts (positive or negative) to BIPOC, non-BIPOC, low-income, and non-low-income populations based on where they live. The results are summarized in Table i. Comparison indices of less than 0.9 indicate that there is **potential for both disparate impact and disproportionate burden**. An additional analysis of absolute increases/decreases in trips came to similar conclusions.

Table i. Service Change Impacts

Measure	BIPOC	Non-BIPOC	Low-Income	Non-Low-Income
Percent Change in Average Fare	+10.5%	+13.4%	+10.8%	+12.8%
Comparison Index		0.78		0.84
Potential for Disparate Impact / Disproportionate Burden?	0.78 < 0.9	Yes	0.84 < 0.9	Yes

Fare Equity Analysis

Two fare equity analyses were conducted by estimating fares paid before and after the change, then determining the ridership-weighted change for BIPOC, non-BIPOC, low-income, and non-low-income riders. Table ii summarizes the results of the more detailed of the two analyses, which combined onboard survey data with farebox records to identify the distribution of demographic groups across fare media and fare types. In comparing BIPOC and non-BIPOC riders, a comparison index greater than 0.9 indicates that there is **no disparate impact from proposed fare changes**. However, the comparison between low-income and non-low-income riders results in a comparison index below the 0.9 threshold, indicating the **potential for disproportionate burden**. A more high-level analysis using only onboard survey data came to similar conclusions.

Table ii. Fare Change Impacts

Measure	BIPOC	Non-BIPOC	Low-Income	Non-Low-Income
Percent Change in Average Fare	-26.3%	-14.5%	-15.6%	-17.9%
Comparison Index		1.82		0.87
Potential for Disparate Impact / Disproportionate Burden?	1.82 > 0.9	No	0.87 < 0.9	Yes

Discussion

A major service change that results in a disparate impact or disproportionate burden 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 or disproportionate burden while still accomplishing the transit provider's legitimate program goals.

The proposed replacement bus service aims to ensure that connections that can currently be made via Northstar can continue to be made via bus service. While the analysis methods yielded results indicating potential disparate impact and disproportionate burden, other factors must be considered to gain a full understanding of the effects of these service changes.

- The Census-based methodology for service equity analysis includes the demographics of the population living near stops and stations regardless of whether those residents use transit or not, while potentially excluding riders who use a route to connect to jobs and services beyond their home census blocks. The planned enhancements to Route 852 would benefit a ridership is that is a higher percentage BIPOC and low-income than service area residents.
- The fare equity analysis includes all riders on the current Northstar line, including those outside the statutory service area who would face substantial costs to reaching the replacement Route 888 at its terminus in Ramsey. If these costs were factored in, or these riders were excluded, the analysis would not indicate a disproportionate burden.

Metro Transit and Metropolitan Council leadership will consider the findings of this service and fare equity analysis before determining next steps.

CHAPTER 1: 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.

Report Purpose

The purpose of this report is to evaluate Metro Transit's proposed replacement of the Northstar rail line with bus service to ensure the impacts of this change would occur in a nondiscriminatory manner on the basis of race, color, national origin, and low-income status. The results will help determine whether there would be disparate impact on the basis of race, color, or national origin, and whether there would be disproportionate burden on low-income riders.

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.[1]

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. Additionally, FTA requires transit providers to define their own "major service change" threshold. If this threshold is exceeded, a Title VI service equity analysis must be completed.

Proposed Service Changes

Metro Transit is proposing significant service changes to the Northstar commuter rail corridor in response to low ridership levels combined with a relatively high cost to operate the service. Under this set of service changes, the Northstar commuter rail line would suspend service.[2] However, in an effort to offset the loss of transit service along the Northstar alignment, Metro Transit also proposes the addition of new bus service and modifications to existing bus service.

Northstar commuter rail service would be replaced by a new express bus route, numbered as Route 888, reflecting the same route number currently assigned to the Northstar service. The new Route 888

[1] U.S. President, Proclamation, Executive Order 12898: Federal Actions To Address Environmental Justice in Minority Populations and Low-Income Populations, Feb. 11, 1994. This executive order was revoked in President Donald Trump's January 21, 2025 Executive Order 14173: Ending Illegal Discrimination and Restoring Merit-Based Opportunity. However, FTA guidance has not changed; nor has the Civil Rights Act of 1964.

[2] Suspension of service is a first step that would be followed by a formal elimination of Northstar service at a later date. This approach was approved via business item 2025-178, August 11, 2025. https://metrocouncil.org/Council-Meetings/Committees/Transportation-Committee/2025/August-11,-2025/2025-178.aspx

would serve the Ramsey, Anoka, and Coon Rapids-Riverdale stations directly. It does not include a stop at the existing Fridley Station in part to ensure the route has a feasible runtime; replacement service at Fridley would be provided by changes to existing Route 852 instead . Due to statutory limitations on areas in which Metro Transit may operate bus service, the new Route 888 would not serve Elk River Station and Big Lake Station.

Base weekday service frequency on the new Route 888 would be 60 minutes, while peak direction (southbound A.M. and northbound P.M.) weekday frequency would be 30 minutes. Service on Saturday and Sunday would include three trips in each direction, with varied frequencies. Frequencies for the proposed Route 888 would be significantly higher than those on the existing Northstar commuter rail service.

Metro Transit is also proposing to make adjustments to existing Route 852. Route 852 currently serves Fridley Station as the southernmost stop on the line before downtown Minneapolis. The proposed route would be modified south of Interstate 694 to serve local stops along East River Road and Marshall Street. The route would continue to serve Fridley Station, ensuring that a connection between Fridley and downtown Minneapolis continues to be available in the absence of Northstar service. To reflect the addition of limited local stop service along what is currently Route 852 and to remain consistent with Metro Transit's route numbering scheme, the route would be renumbered as Route 827.

The new Route 827 would have a peak direction weekday frequency of 30 minutes south of Northtown Transit Center, with a 60-minute base frequency. Weekend frequency would be 60 minutes throughout the service window.

Proposed Fare Changes

The service changes would be accompanied by fare changes reflecting changes in route type.

- Currently, Northstar uses a zone-based fare system with surcharges based on distance travelled. The new bus Route 888 would operate as a regular commuter express bus with a $3.25 peak fare/$2.50 off-peak fare.
- Route 852 has variable fares depending on service type used. Trips entirely north or entirely south of Interstate 694 (described as "North/North" and "South/South" in Table 1) are paid as local fare. Trips continuing downtown ("North/South") are paid as express fare. Future Route 827 would operate as a regular local bus with a flat $2.00 fare.

The resulting changes for riders using a Regular Adult fare are shown in Table 1. For purposes of this analysis, St. Cloud is included as a zone because approximately one in six Northstar riders start their trips there. The fare assigned to St. Cloud is identical to Big Lake.

In addition to Regular Adult fares, Metro Transit offers Mobility and Youth/Senior discounted fares. Anticipated changes to Mobility fares are shown in Table 2, and Youth/Senior fares in Table 3. Note that neither Northstar commuter rail nor express bus service offer a discounted Youth/Senior fare; Northstar riders eligible for this fare on other Metro Transit services would continue to pay full express fares on Route 888.

Table 1. Current and Proposed Regular Adult Fares

Route	Fare Zone	Current Fare	Proposed Fare	Percent Change
Northstar (Future Route 888)	St. Cloud	$6.25	$3.25	-48%
	Big Lake	$6.25	$3.25	-48%
	Elk River	$4.75	$3.25	-32%
	Ramsey	$3.75	$3.25	-13%
	Anoka	$3.25	$3.25	0%
	Coon Rapids	$3.25	$3.25	0%
	Fridley	$3.25	$3.25	0%
Route 852 (Future Route 827)	North/North	$2.00	$2.00	0%
	North/South	$3.25	$2.00	-38%
	South/South	$2.00	$2.00	0%

Table 2. Current and Proposed Mobility Fares

Route	Fare Zone	Current Fare	Proposed Fare	Percent Change
Northstar (Future Route 888)	St. Cloud	$2.00	$1.00	-50%
	Big Lake	$2.00	$1.00	-50%
	Elk River	$1.50	$1.00	-33%
	Ramsey	$1.25	$1.00	-20%
	Anoka	$1.25	$1.00	-20%
	Coon Rapids	$1.25	$1.00	-20%
	Fridley	$1.00	$1.00	0%
Route 852 (Future Route 827)	North/North	$1.00	$1.00	0%
	North/South	$1.00	$1.00	0%
	South/South	$1.00	$1.00	0%

Table 3. Current and Proposed Youth/Senior Fares

Route	Fare Zone	Current Fare	Proposed Fare	Percent Change
Northstar (Future Route 888)	St. Cloud	$6.25	$3.25	**-48%**
	Big Lake	$6.25	$3.25	**-48%**
	Elk River	$4.75	$3.25	**-32%**
	Ramsey	$3.75	$3.25	**-13%**
	Anoka	$3.25	$3.25	**0%**
	Coon Rapids	$3.25	$3.25	**0%**
	Fridley	$3.25	$3.25	**0%**
Route 852 (Future Route 827)	North/North	$1.00	$1.00	**0%**
	North/South	$3.25	$1.00	**-69%**
	South/South	$1.00	$1.00	**0%**

CHAPTER 2: 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.

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[3] - 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.

Title VI was identified as one of several federal laws that should be applied "to prevent minority communities and low-income communities from being subject to disproportionately high and adverse environmental effects."

To provide direction to recipients of federal funding, FTA issued Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients in 2012. 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.

[3] U.S. President, Proclamation, Executive Order 12898: Federal Actions To Address Environmental Justice in Minority Populations and Low-Income Populations, Feb. 11, 1994. Accessed February 12, 2025. This executive order was revoked in President Donald Trump's January 21, 2025 Executive Order 14173: Ending Illegal Discrimination and Restoring Merit-Based Opportunity. However, FTA guidance has not changed; nor has the Civil Rights Act of 1964.

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. This report references several elements from the current Title VI Program, approved by the Metropolitan Council in 2022.

Requirement to Conduct 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 fare change and any major service change. This analysis fulfills these requirements.

The proposed Northstar transition meets the definition of a fare change and a major service change. Metro Transit's Major Service Change Policy is defined in the 2023-2025 Metropolitan Council Title VI Program. Four criteria are included in the policy:

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

A service change meeting any of these four thresholds qualifies as a major service change and requires an equity analysis. The proposed changes to service in the Northstar corridor meet the first and third criteria.

In accordance with FTA Circular 4702.1B, completion of an equity analysis requires the incorporation of several Title VI policies, which are set by the transit provider. These include the "disparate impact" and "disproportionate burden" policies, used to assess whether the effects of proposed 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.

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.

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 policy 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 a 10 percent difference between demographic groups, meaning that there may be evidence of disparate impact if:

- *Benefits* are being provided to Black, Indigenous, and people of color (BIPOC) populations at a rate less than 90 percent of the benefits being provided to non-BIPOC populations, or
- *Adverse effects* are being borne by non-BIPOC populations at a rate less than 90 percent 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. Although this framework 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 90 percent threshold for its disparate impact and disproportionate burden thresholds was subject to a formal public outreach process before being adopted by the Metropolitan Council in 2022. Prior to the 2022 policy update, 80 percent was the threshold. Additional information about the policies and their applications can be found in the Council's current Title VI Program.

Policies Applied to Proposed Changes

A service or fare 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 to the determination of disproportionate burden on low-income residents relative to non-low-income residents.

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.[4] 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. References to BIPOC or communities of color in this report should be interpreted to mean the same 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 requires 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 analysis used 185 percent of the HHS poverty guidelines to define low-income populations. The Metropolitan Council uses 185 percent of the HHS poverty guidelines to define poverty in its place-based equity research, regional policies, and other initiatives, and this Title VI analysis mirrors that approach.[5]

HHS updates its poverty guidelines annually. The service equity analysis, which used pre-calculated figures from the U.S. Census Bureau, uses guidelines for 2023 (the most recent data year available). The fare equity analysis used guidelines from the year 2022 to match the period represented by on-

[4] 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.

[5] 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 an 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.

board survey data, explained in the following chapter. Table 4 lists the 2022 HHS poverty guidelines that are used in this analysis.

Table 4. 2022 Department of Health and Human Services Poverty Guidelines in Dollars

Size of Family Unit	100% Poverty Guideline ($)	185% Poverty Guideline ($)
1	$13,590	$25,142
2	$18,310	$33,874
3	$23,030	$42,606
4	$27,750	$51,338
5	$32,470	$60,070
6	$37,190	$68,802
7	$41,910	$77,534
8	$46,630	$86,266
9	$51,350	$94,998
10	$56,070	$103,730
For each additional person add	$4,720	$8,732

Source: https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines

CHAPTER 3: ANALYSIS METHODOLOGY

The suspension of Northstar commuter rail service requires both a service equity analysis and a fare equity analysis. The following sections describe the technical methodology of each of these analyses.

Service Equity Analysis

A geographic information systems (GIS)-based approach was used in the service equity analysis to measure the location and magnitude of service changes and compare the distribution of impacts (positive or negative) to BIPOC, 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 or half mile/10-minute walk or roll from a METRO station) based on the street network.
3. Calculate the percent change and absolute change in service between the existing/baseline and proposed service levels for each census block served in either scenario.
4. Calculate the population-weighted average percent change (and absolute change) in service for all population groups within the service change area.
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 weekly 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.

Examining a percentage change in weekly trips emphasizes relative changes, while the absolute change in weekly trips emphasizes resource allocation. The percentage change is the primary metric for Title VI analyses, but the absolute change is often helpful in understanding how impacts are experienced and why.

Transit Networks

Two networks were modeled to represent service levels from which to calculate changes – an existing/baseline network and a proposed network.

- The existing network consists of the July 2025 schedule for Northstar, Route 852, and the routes with transfer points at Northstar stations: 850, 860, 805, 10, and 824. It excludes

downtown Minneapolis. This approach to network definition represents the population who would be most affected by changes to Northstar.

- The future network similarly includes July 2025 scheduled service for routes 850, 860, 805, 10, and 824, excluding downtown. To represent service changes, GTFS files for the proposed Route 888 and Route 827 were exported from Remix.

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, commuter rail stations were 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 station.

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.). Due to the large size of some census blocks, if a stop or station is located within a block it is also included in the analysis, even if the geographic center is not within the walk distance threshold. 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 the 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 those 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, non-BIPOC, low-income, and non-low-income populations were estimated at the census block level by applying areal interpolation techniques to the 2019-2023 American Community Survey (ACS) 5-Year Estimates. Figure 1 and Figure 2, respectively, show the distribution of BIPOC and non-BIPOC residents and low-income and non-low-income residents, by census block, within the area served by the Northstar commuter rail.

Figure 1. BIPOC Population in the Northstar Corridor

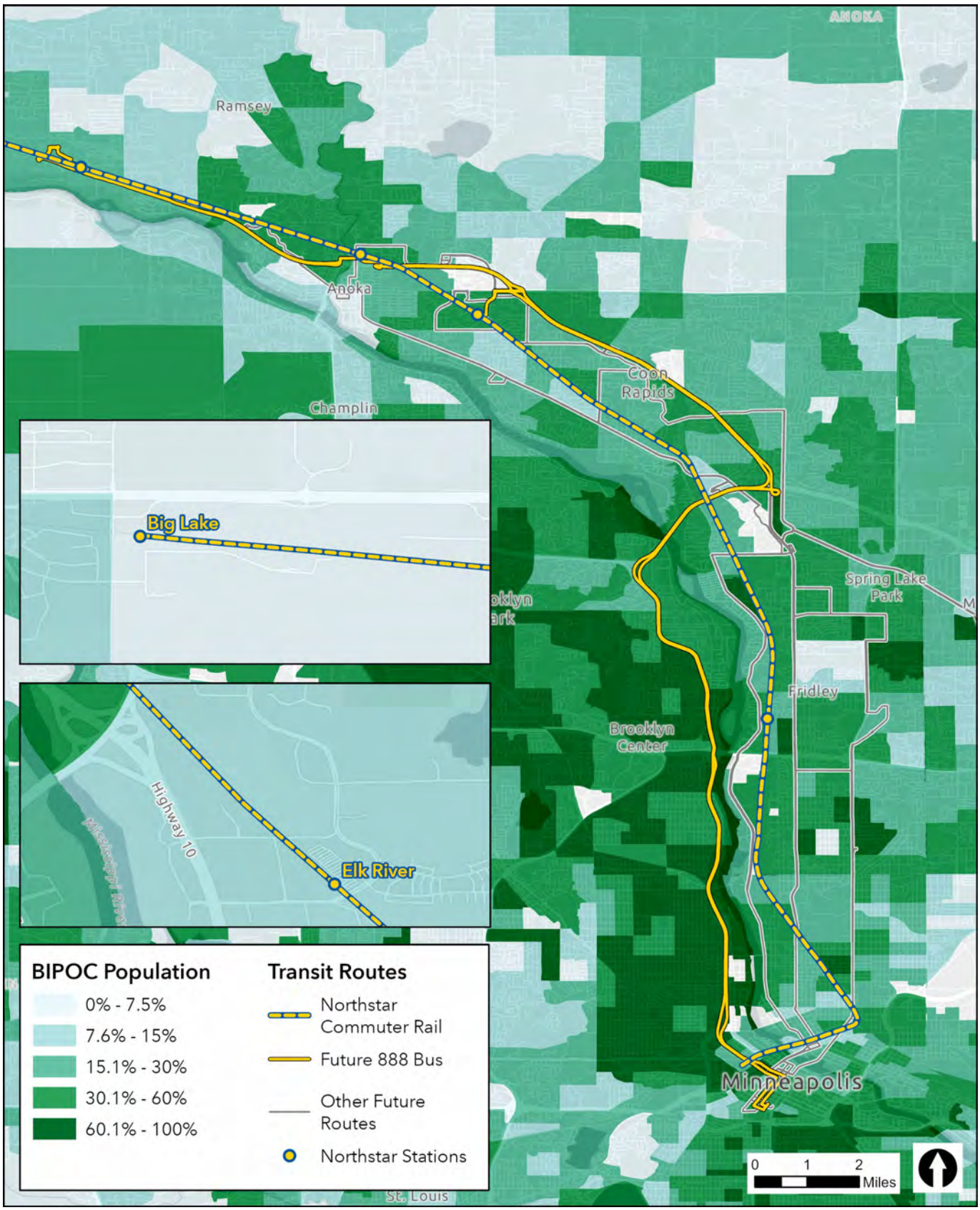
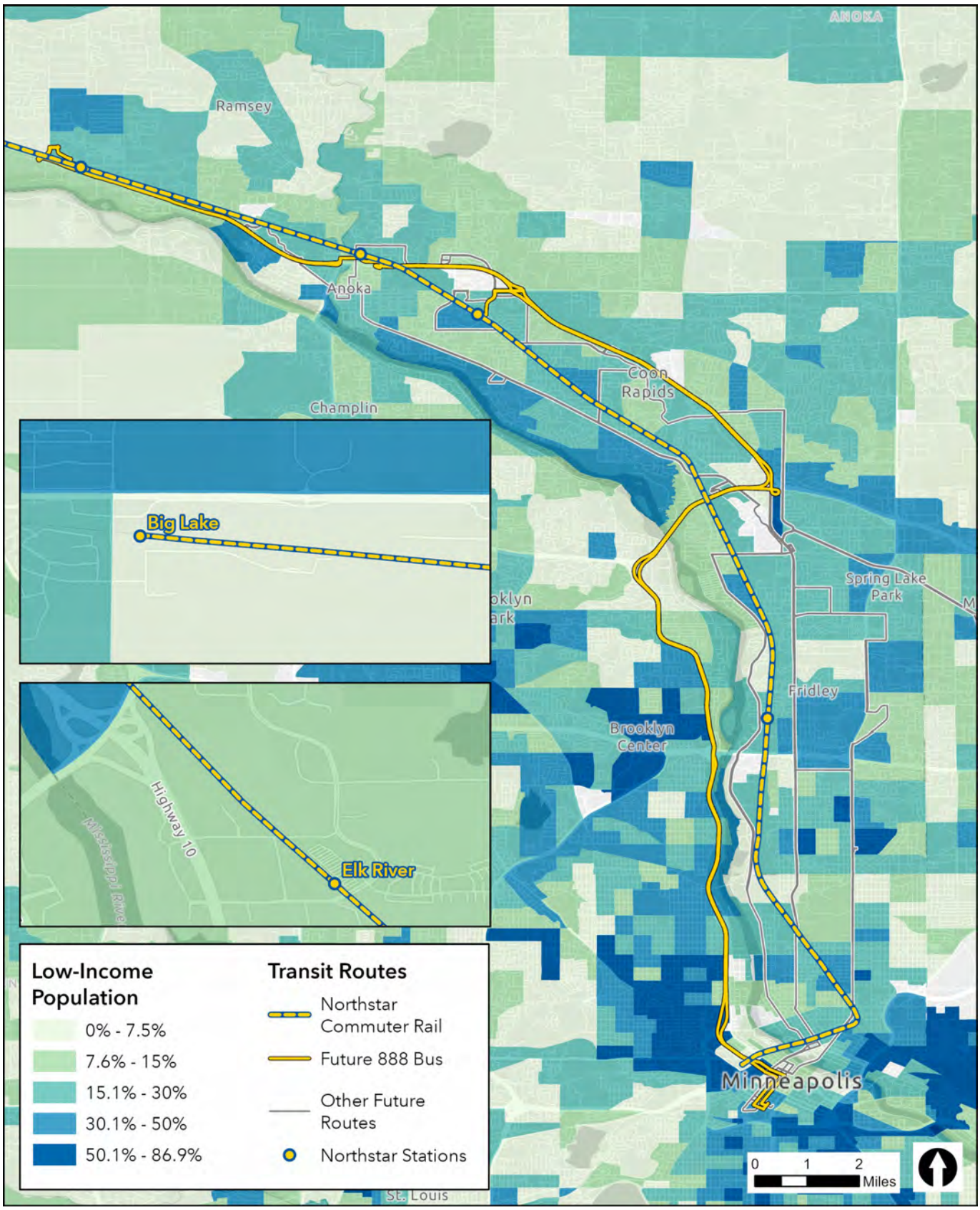


Figure 2. Low-Income Population in the Northstar Corridor



Calculating Change in Service Level by Census Block

The absolute change in service 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.

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 absolute and percent changes in service for each target population (i.e., BIPOC, non-BIPOC, low-income, and non-low-income) were calculated by weighting the absolute and percent changes in service for each census block by the target population served in that census block. For example, the average absolute change in service for BIPOC populations was calculated by multiplying each census block's BIPOC population by the absolute 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 formulas used for these analyses are shown in Figure 3.

Figure 3. Formulas for Determining Average Percent and Absolute Changes in Service

$$Avg\ abs\ change\ in\ service = \frac{\sum(Population_i \times Absolute\ Change_i)}{\sum Population_i}$$

$$Avg\ \%\ change\ in\ service = \frac{\sum(Population_i \times Percent\ Change_i)}{\sum Population_i}$$

Where:

$Population_i$ = Target population of census block *i*.

$Absolute\ Change_i$= Absolute change in service levels for census block i

$Percent\ Change_i$ = Percent change in service levels for census block *i*

In this manner, the weighted absolute and percent changes were 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.

Fare Equity Analysis

Metro Transit's standard method for assessing fare changes involves estimating fares paid before and after the change, then determining the ridership-weighted change for BIPOC, non-BIPOC, low-income, and non-low-income riders. As demographic ridership data and fare payment data are not available in a single-source dataset, two analyses were conducted to evaluate fare equity: a high-level analysis using only onboard survey data with the assumption that all riders pay a single cash fare, and a more detailed analysis combining onboard survey data with farebox records to further describe changes across discrete fare media. Because both methods have benefits and limitations, both are presented in this report.

Onboard Survey Data

Transit rider demographics were gathered from the Travel Behavior Inventory (TBI) 2022 Transit Onboard Survey.[6] The TBI is a series of comprehensive surveys conducted at least every five 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 TBI onboard 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. The TBI onboard survey is thus the preferred data source for use in the Metropolitan Council's Title VI Program and applicable equity analyses.

Each record in the TBI onboard 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.

The 2022 TBI onboard survey questionnaire did not include questions about fare payment. For this reason, fare payment is described using an assumption of single cash fare payment (high-level analysis) or in conjunction with farebox records assuming certain proportionality between fare media and demographics (fare medium analysis).

The TBI onboard survey results include detailed transit trip (origin to destination) records for about 133,000 transit trips across all providers and regional regular routes. For this analysis, the survey results were filtered to those collected on two routes: Northstar commuter rail and Route 852. This resulted in a total of 129 survey records. Table 5 lists variables from the survey that were used in this fare equity analysis.

[6] Metropolitan Council, *Travel Behavior Inventory (TBI) 2022 Onboard Survey*.

Table 5. Onboard Survey Variables Applicable to Analysis

Purpose	Variable	Possible Values*
Demographic	Race/Ethnicity**	American Indian or Alaskan Native, Asian, Black or African American, Hispanic or Latino, Native Hawaiian or Pacific Islander, White, Other
Demographic	Total Annual Household Income	Less than $15,000, $15,000-$24,999, $25,000-$34,999, $35,000-$59,999, $60,000-$99,999, $100,000-$149,999, $150,000-$199,999, $200,000 or more, Not provided
Demographic	Household Size	1, 2, 3, 4, 5, 6, 7, 8, 9, 10+
Fare Type	Disability Status	Yes, No, Don't Know/Refuse
Fare Type	Age	Under 5, 5-15, 16-17, 18-24, 25-34, 35-44, 45-54, 55-64, 65-74, 75 and over, Prefer not to answer, Other, Refused/No Answer
Service	Surveyed Route	Northstar, Route 852
Fare (Peak vs Off-Peak)	Time Period	Before 6:00 am, 6:00 am - 7:00 am, 7:00 am -8:00 am, 8:00 am - 9:00 am, 9:01 am - 10:00 am, 10:00 am - 11:00 am, 11:00 am - 12:00 pm, 12:00 pm - 1:00 pm, 1:00 pm - 2:00 pm, 3:01 pm - 4:00 pm, 4:00 pm - 5:00 pm, 5:00 pm - 6:00 pm, 6:00 pm - 6:30 pm, 6:31 pm - 7:00 pm, 7:00 pm - 8:00 pm, 8:00 pm - 9:00 pm, After 9:00 pm, Other, Refused/No Answer

*As reported in TBI results
**Respondents were allowed to select multiple race/ethnicity categories; those who chose to do so were considered BIPOC for the purposes of this analysis

Assigning Low-Income Status

The identification of low-income riders was based on a combination of self-reported household size and household income. TBI onboard survey respondents were asked to report their total annual household income based on a series of income brackets, each with a range of at least $10,000 (as shown in Table 5).

The survey income brackets do not correspond exactly to the HHS poverty guidelines shown in Table 4. Thus, for this fare equity analysis, the low point of each income bracket was used to represent a survey respondent's household income; this, in combination with reported household size, was then compared to the HHS poverty guidelines to determine whether or not the respondent would be assigned low-income or non-low-income status.

Excluded Survey Records

TBI onboard survey records with one or more of the following characteristics were excluded from the analysis:

- Did not report age (excluded from all analyses)
- Child under 5 (excluded from all analyses)
- Did not report income and/or household size (excluded from low-income analysis)
- Did not report race/ethnicity (excluded from BIPOC analysis)

High-Level Analysis

The high-level analysis was completed before farebox data was available. This analysis only incorporates data from the TBI onboard survey for Northstar and Route 852, as these are the only routes with planned changes to their respective fare structures.

The high-level analysis assumes all riders pay a one-way, 2.5 hour fare (e.g. no passes) and classifies them by limited mobility and youth/senior status to determine the use of mobility and reduced fare types, and then further classifies them according to BIPOC and low-income status. Linked trips for each combination of these characteristics are shown in Table 6. Note that non-responses to demographic questions were represented as their own categories (BIPOC NA and income NA) but do not factor into the comparison indices used in evaluating potential impacts.

Table 6. Linked Trips by Fare Combination

Fare Type	BIPOC	Non-BIPOC	BIPOC NA	Low-Income	Non-Low-Income	Income NA
Adult	149.0	336.6	52.0	166.5	235.6	135.5
Mobility	19.8	42.8	6.0	15.9	27.6	25.1
Youth/Senior	0.0	26.6	0.0	24.9	1.7	0.0
Total	168.9	405.9	58.0	207.3	264.9	160.6

These trips were then subdivided further into the zonal fare structures of both Northstar and Route 852. The percent change in fare paid was then calculated for each combination of demographic category, fare zone, and fare type. These percent changes were then averaged by BIPOC and low-income status, weighted by the number of linked trips in each fare type-fare zone combination. This weighted average change in fare paid was then compared between BIPOC and non-BIPOC riders and between low-income and non-low-income riders, generating the indices for disparate impact and disproportionate burden used to evaluate potential impacts.

Fare Medium Analysis

The second fare analysis used Metro Transit farebox records from January to December 2024 on Northstar and Route 852. This fare medium analysis used farebox data to evaluate differences in per trip costs among different fare media before and after the proposed changes are implemented. The fare medium analysis comprised four steps:

- Calculate average weekly linked trips for each combination of route, fare type, fare zone, and demographic category
- Proportionally distribute fare media usage data across onboard survey records, with assumptions based on mobility and youth/senior status.
- Calculate effective cost per trip for each medium (e.g. UMN Student Pass is $165 for one semester; dividing by two trips a day over 104 school days gives average of $0.79 per trip)
- Calculate average percent change in fare paid by demographic group, weighted by corresponding linked trips in each fare medium and fare zone combination.

The set of onboard survey records to which fare media were assigned was conditional to their age and mobility status (e.g. mobility fares were only assigned to records indicating limited mobility). Multi-trip passes with no explicit fare group restrictions, such as the 31-day pass, were assumed to be available to all riders and so were distributed across fare groups according to their share of total rides. A list of fare media and their eligible TBI onboard survey records is shown in Table 7.

Northstar data collection differs from other routes and does not capture fare types such as Mobility and Youth/Senior fares. To account for this, Northstar passenger trips in the onboard survey that indicate limited-mobility or youth/senior rider status were assumed to use Mobility or Youth/Senior fares, as these represent the optimal fare payment method with the lowest overall cost.

Table 7. Fare Medium Onboard Survey Records

Fare Medium	TBI Onboard Survey Records
Metropass	Disability Status: No or Don't Know/Refuse
Single Payment	Disability Status: No or Don't Know/Refuse Age Groups: 16-17, 18-24, 25-34, 35-44, 45-54, 55-64
UMN Student	Disability Status: No or Don't Know/Refuse
College Pass	Disability Status: No or Don't Know/Refuse
1 & 7 Day Pass	Disability Status: No or Don't Know/Refuse
31 Day Pass	Disability Status: No or Don't Know/Refuse
Youth Senior Single Payment	Disability Status: No or Don't Know/Refuse Age Groups: Under 5, 5-15, 65-74, and 75 and over
Youth Senior 10-Ride	Disability Status: No or Don't Know/Refuse Age Groups: Under 5, 5-15, 65-74, and 75 and over
Student Pass	Disability Status: No or Don't Know/Refuse Age Groups: Under 5, 5-15, 65-74, and 75 and over
Mobility Fare	Disability Status: Yes
Adult 10-Ride	Disability Status: No or Don't Know/Refuse Age Groups: 16-17, 18-24, 25-34, 35-44, 45-54, 55-64

The result of the proportional distribution process was a table describing linked trips by fare medium, fare type, demographic category, and fare zone. A summary table of linked trips by fare medium and demographic category is shown in Table 8.

The percent change in fare paid was then calculated for each combination of demographic category, fare medium, and fare zone. These percent changes were then averaged by BIPOC and low-income status, weighted by the number of linked trips in each fare medium-fare zone combination. This weighted average change in fare paid was then compared between BIPOC and non-BIPOC riders and between low-income and non-low-income riders, generating the indices for disparate impact and disproportionate burden used to evaluate potential impacts.

Table 8. Linked Trips by Fare Medium, Fare Type, and Demographic Status

Fare Medium	Fare Type	Total	BIPOC	Non-BIPOC	BIPOC NA	Low-Income	Non-Low-Income	Low-Income NA
Single Payment	Adult	361.0	108.1	219.6	33.3	118.5	153.2	89.3
	Mobility	42.6	12.6	26.6	3.4	9.8	17.0	15.8
	Youth/Senior	12.3	0.0	12.3	0.0	11.5	0.8	0.0
1 & 7 Day Pass	Adult	0.4	0.2	0.2	0.0	0.1	0.1	0.1
	Mobility	0.1	0.0	0.0	0.0	0.0	0.0	0.0
	Youth/Senior	0.0	0.0	0.0	0.0	0.0	0.0	0.0
31 Day Pass	Adult	13.1	4.5	7.9	0.7	4.1	5.1	3.9
	Mobility	1.6	0.4	1.1	0.2	0.5	0.5	0.6
	Youth/Senior	0.7	0.0	0.7	0.0	0.6	0.0	0.0
College Pass	Adult	2.7	1.0	1.6	0.1	0.9	0.9	0.8
	Mobility	0.3	0.1	0.2	0.0	0.1	0.1	0.1
	Youth/Senior	0.2	0.0	0.2	0.0	0.1	0.0	0.0
Metropass	Adult	110.7	20.5	75.9	14.3	28.1	55.5	27.1
	Mobility	14.2	4.7	8.7	0.8	2.4	6.3	5.5
	Youth/Senior	3.1	0.0	3.1	0.0	2.9	0.2	0.0
UMN Student	Adult	43.3	12.7	27.3	3.3	12.8	18.3	12.2
	Mobility	5.4	1.5	3.5	0.5	1.5	2.0	2.0
	Youth/Senior	1.9	0.0	1.9	0.0	1.8	0.1	0.0
Adult 10-Ride	Adult	6.4	2.1	4.0	0.3	2.0	2.5	1.9
Mobility Fare	Mobility	4.3	0.6	2.7	1.1	1.5	1.7	1.1
Student Pass	Youth/Senior	1.6	0.0	1.6	0.0	1.5	0.1	0.0
Y/S 10-Ride	Youth/Senior	0.7	0.0	0.7	0.0	0.6	0.0	0.0
Y/S Single Payment	Youth/Senior	6.2	0.0	6.2	0.0	5.8	0.4	0.0
Total		**632.8**	**168.9**	**405.9**	**58.0**	**207.3**	**264.9**	**160.6**

Source: 2022 TBI Onboard Survey and Metro Transit farebox data

CHAPTER 4: EVALUATION OF IMPACTS FROM SERVICE CHANGES

As described in Chapter 3, both a percentage change and an absolute change in weekly trips were used to measure changes in service in the Northstar corridor. The results of both analyses are discussed in the following sections.

Percent Change in Service Levels

The average person living in the Northstar corridor today – regardless of race, ethnicity, or low-income status – is expected to experience a 12.4 percent increase in transit service upon implementation of the Northstar replacement bus routes (Table 9). The average BIPOC resident would see a 10.5 percent increase in available service, while the average non-BIPOC resident would experience a 13.4 percent increase. As a result, the service increase for the average BIPOC resident would be 78 percent of the increase for the average non-BIPOC resident. Because BIPOC residents are expected to benefit at a rate of less than 90 percent of the benefit to non-BIPOC residents, this analysis identifies **a potential for disparate impact on BIPOC residents** as a result of the service changes in the Northstar corridor.

The average low-income resident in the Northstar corridor would experience a 10.8 percent increase in transit service resulting from the service changes, while the average non-low-income resident would experience a 12.8 percent increase. As a result, the service increase for the average low-income resident would be 84 percent of the increase for the average non-low-income resident. Because low-income residents are expected to benefit at a rate of less than 90 percent of the benefits to non-low-income residents, this analysis identifies **a potential for disproportionate burden on low-income residents** as a result of the Northstar service changes.

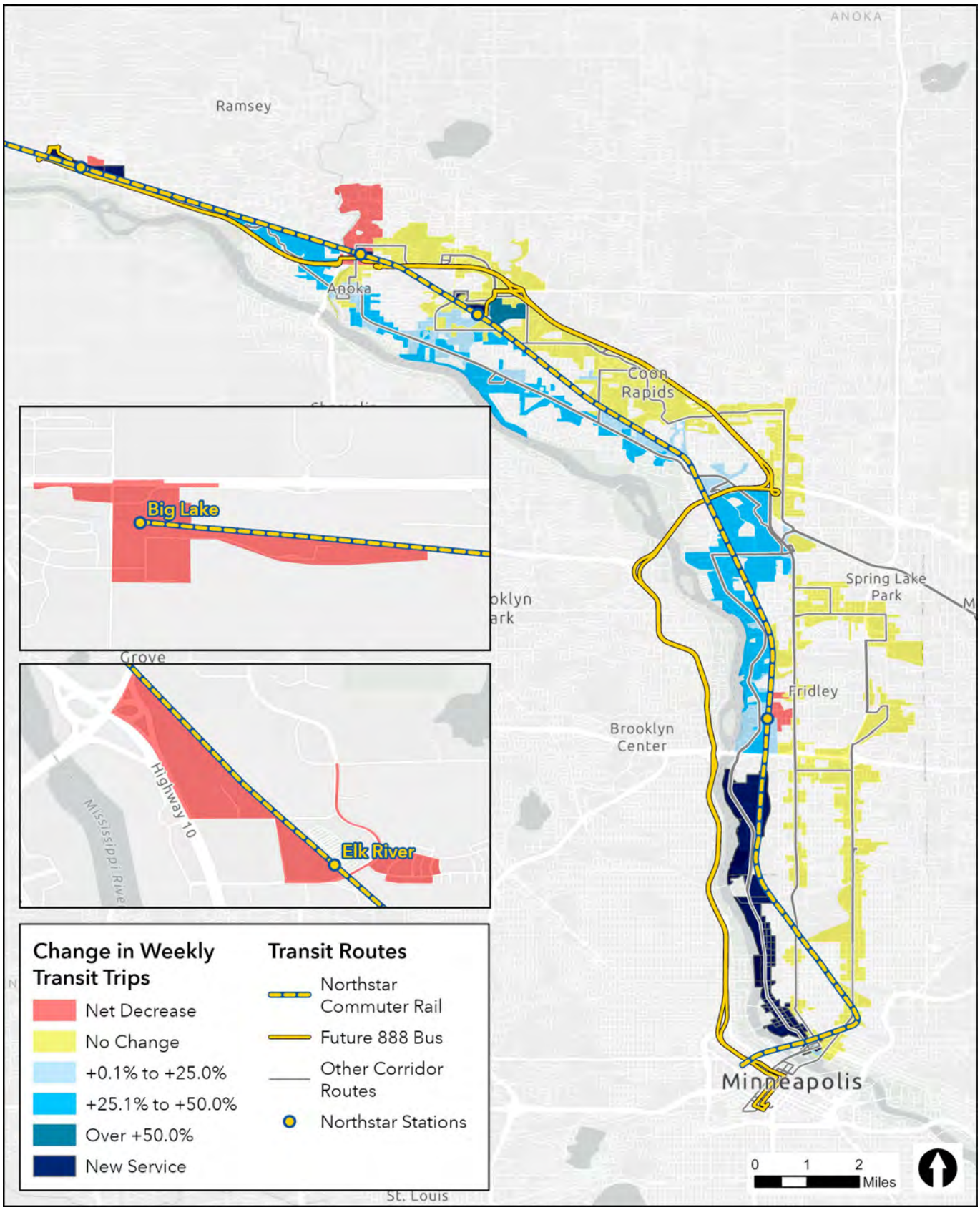
Table 9. Average Percent Change in Service: Proposed vs. CurrentGroup	**Average Percent Change in Service**
Total	+12.4%
BIPOC	+10.5%
Non-BIPOC	+13.4%
Disparate Impact Index	**0.78**
Low-Income	+10.8%
Non-Low-Income	+12.8%
Disproportionate Burden Index	**0.84**

Source: SRF analysis of Metro Transit and Census data.

The distribution of percent changes in service availability is shown in Figure 4. A large loss in trip availability is predictably seen in the area around Big Lake Station and Elk River Station, resulting from the fact that Metro Transit cannot legally operate replacement bus service in these communities as

they are located outside the statutory service area. Additionally, some areas of net decrease in service availability would occur near Ramsey, Anoka, and Fridley Stations. These decreases are attributed to differing boarding locations between rail and bus service, and the more limited definition of service availability for bus versus rail service (5-minute versus 10-minute travelshed.) These areas are relatively small, and as a whole, service availability is expected to either increase or remain the same in the majority of the Northstar's current service area.

Figure 4. Percent Change in Service by Census Block, Proposed vs. Current



Absolute Change in Service Levels

The absolute change in service was calculated using a similar methodology to the percentage change. However, rather than the average percentage increase or decrease in weekly trips, the change in average number of weekly trips was measured.

Table 10 shows the result of this calculation. The average person living in the Northstar corridor – regardless of race, ethnicity, or low-income status – is expected to have an additional 24.6 weekly trips available when comparing proposed service to current service levels.

The average BIPOC resident would see an increase of 19.5 available weekly trips, while the average non-BIPOC resident would see an increase of 27.4 available weekly trips. As a result, the service increase for the average BIPOC resident would be 71 percent of the increase for the average non-BIPOC resident. Because BIPOC residents are expected to benefit at a rate of less than 90 percent of the benefits to non-BIPOC residents, this analysis identifies **a potential for disparate impact in BIPOC residents** as a result of the proposed service changes in the Northstar corridor.

The average low-income resident would see an increase of 20.9 available weekly trips resulting from the service changes, while the average non-low-income resident would see an increase of 25.6 available weekly trips. As a result, the absolute service increase for the average low-income resident would be 82 percent of the absolute service increase for the average non-low-income resident. Because low-income residents are expected to benefit at a rate of less than 90 percent of the benefits to non-low-income residents, this analysis indicates **a potential for disproportionate burden on low-income residents** as a result of the Northstar service changes.

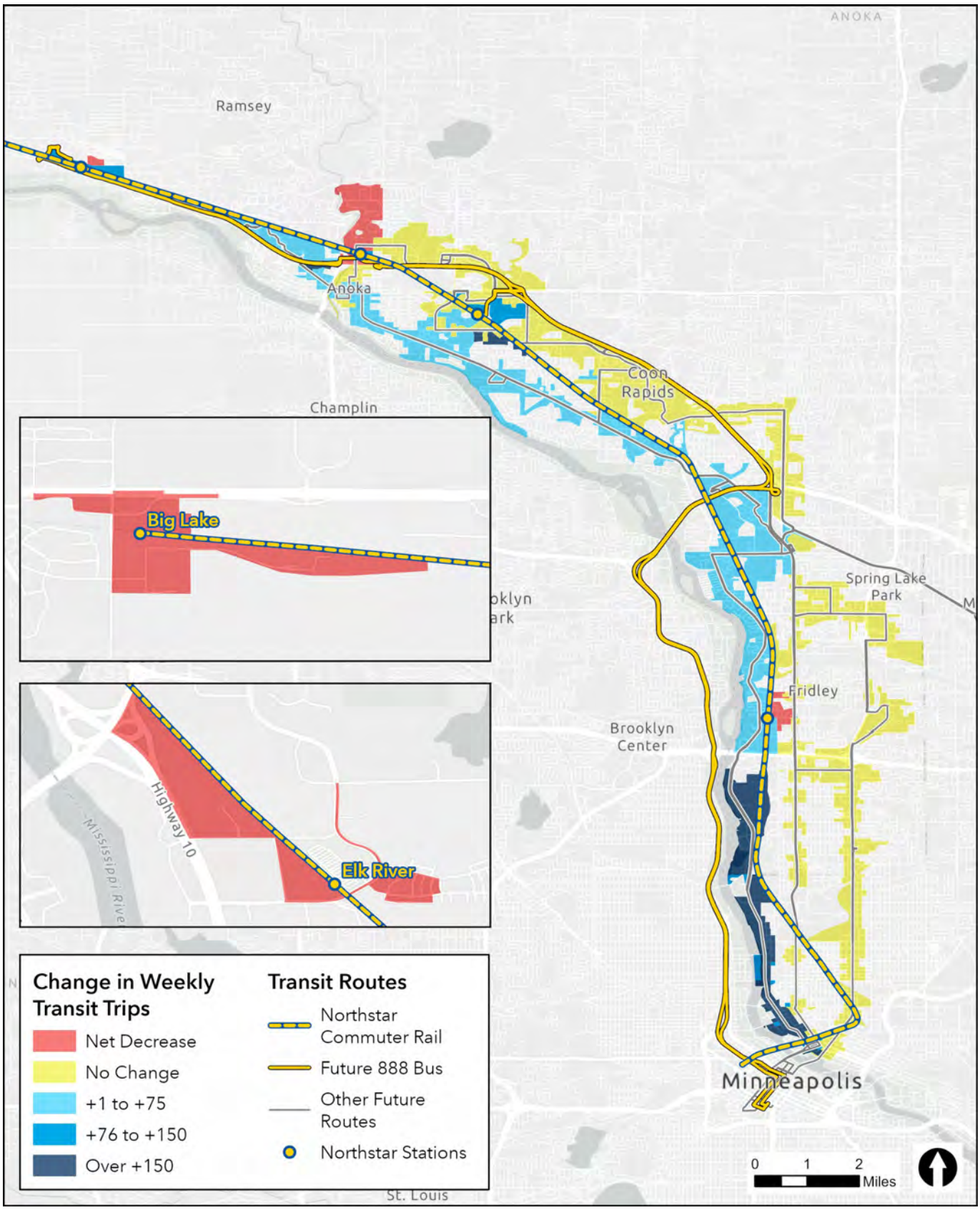
Table 10. Average Absolute Change in Service: Proposed vs. Current

Group	Average Absolute Change in Service (Number of Weekly Trips)
Total	+24.6%
BIPOC	+19.5
Non-BIPOC	+27.4
Disparate Impact Index	**0.71**
Low-Income	+20.9
Non-Low-Income	+25.6
Disproportionate Burden Index	**0.82**

Source: SRF analysis of Metro Transit and Census data.

The distribution of absolute changes in service availability is shown in Figure 5. Decreases in available transit trips are seen around the Big Lake and Elk River stations, which would no longer receive service from Metro Transit. Additionally, some areas of service availability decrease are estimated near the Ramsey, Anoka, and Fridley Stations. Generally, however, service availability is expected to either increase or stay the same throughout the majority of the service area. The most significant increases in weekly trips occur just east of the Mississippi River south of Interstate 694 where relatively low concentrations of BIPOC and low-income residents live (see Figure 1 and Figure 2 on pages 20-21).

Figure 5. Absolute Change in Service by Census Block, Proposed vs. Current



Discussion

Analysis of proposed bus service compared to the existing Northstar commuter rail service indicates that while a broad increase in service is expected as a whole, the benefits to both BIPOC and low-income residents of the affected areas would be lower than the benefits to non-BIPOC and non-low-income residents. Therefore, the expected difference in benefits crosses Metro Transit's threshold for a disparate impact on BIPOC populations and disproportionate burden on low-income populations.

While the analysis methods yielded a result indicating potential disparate impact and disproportionate burden, other factors must be considered to gain a full understanding of the effects of the service changes. A weakness of the Census-based service equity methodology is that it includes the demographics of the population living near stops and stations regardless of whether those residents use transit or not.

In contrast to these potential users, data from the 2022 onboard survey provide demographic information about current users of each route, who are likely to be more representative of the populations impacted by service changes. As a regional system, Metro Transit connects people to jobs and services well beyond their home census blocks, meaning key users of a given route segment may not be those who live near it but those who rely on it for work or other trip purposes.

The current Route 852 was designated as both BIPOC and Low-Income in the most recent systemwide service monitoring study.[7] These designations are made if a route's riders and/or service area residents are a higher percentage BIPOC/low-income than residents of the total service area. The onboard survey indicates that ridership on Route 852 is 43.2 percent BIPOC and 62.8 percent low-income. The proposed service increases on future Route 827 would benefit these existing riders.

Metro Transit's Title VI policy states that a service change may be implemented if there is substantial legitimate justification for the proposed change and there are no alternatives that would have a lesser impact while accomplishing the agency's goals. In the case of suspending Northstar commuter rail service, Metro Transit would realize substantial savings in operating costs in the corridor. These funds can then be redistributed to other services including those serving more BIPOC or low-income residents, a legitimate justification.

In considering alternatives that would have a lesser impact, the cause of the disparate impact and disproportionate burden must be more closely examined. One of the key causes is added bus service in a new, urbanized area (Figure 4), east of the Mississippi River and south of Interstate 694. The change from commuter rail to local bus service allows for this area to be served. Not serving this area would likely reduce disparate impact or disproportionate burden based on the area demographics (see Figure 1 and Figure 2). However, simply not stopping along this segment of the corridor would not fundamentally improve service for BIPOC or low-income residents. The intent of Title VI policy is not to worsen service for any group.

[7] Metro Transit 2024 Title VI Service Monitoring Study, April 2025

CHAPTER 5: EVALUATION OF IMPACTS FROM FARE ADJUSTMENTS

The impacts of the fare change resulting from suspending Northstar commuter rail service were analyzed using two different methods. The high-level method used onboard survey data exclusively. The more detailed method used farebox data to calculate fare changes based on fare medium and route. Because both methods have benefits and limitations, the results for both are presented in this report.

High-Level Analysis

Comparison indices calculated using the high-level fare analysis are shown in Table 11. On average, BIPOC riders would experience 26.3 percent lower fares under proposed fare changes compared to existing fares. This fare decrease is greater than that for the average non-BIPOC rider, who would experience a 14.5 percent decrease in fares. The resulting comparison index is 1.82. Therefore, per Metro Transit Title VI policies, this analysis identified **no potential for disparate impact** as a result of the proposed fare changes.

On average, low-income riders would experience a reduction of 15.6 percent under proposed fare changes compared to existing fares. This fare decrease when accounting for the entire route is slightly less than that for the average non-low-income rider, who would experience a 17.9 percent reduction. The resulting comparison index is 0.87 which is just below the 0.90 threshold, indicating that there is **potential for disproportionate burden** as a result of the fare changes.

Table 11. Average Change in Fare Comparison - High-Level Analysis

Group	Percent Change in Fare Paid
Total	-17.0%
BIPOC	-26.3%
Non-BIPOC	-14.5%
Disparate Impact	**1.82**
Low-Income	-15.6%
Non-Low-Income	-17.9%
Disproportionate Burden	**0.87**

Source: 2022 TBI Onboard Survey and Metro Transit farebox data

Fare Medium Analysis

Comparison indices calculated using the fare medium analysis are shown in Table 12. On average, BIPOC riders would experience a 20.7 percent reduction under proposed fare type changes compared to existing fares. This fare decrease is slightly less than that for the average non-BIPOC rider, who would experience an 13.8 percent reduction. The resulting comparison index is 1.56, which does not cross the threshold established by the 90 percent rule for disparate impacts. Therefore, per

Metro Transit Title VI policies, this analysis identified **no potential for disparate impact** as a result of the proposed fare changes.

On average, low-income riders would experience a reduction of 13.2 percent under proposed fare changes compared to existing fares. This fare decrease when accounting for the entire route is slightly less than that for the average non-low-income rider, who would experience a 17.4 percent reduction. The resulting comparison index is 0.76 which does cross the 0.90 threshold, indicating that there is **potential for disproportionate burden** as a result of the fare changes.

Table 12. Average Change in Fare Comparison - Fare Medium Analysis

Group	Percent Change in Fare Paid
Total	-15.2%
BIPOC	-20.7%
Non-BIPOC	-13.8%
Disparate Impact Index	**1.50**
Low-Income	-13.2%
Non-Low-Income	-17.4%
Disproportionate Burden Index	**0.76**

Source: 2022 TBI Onboard Survey and Metro Transit farebox data

Analysis Restricted to Metro Transit Service Area

Both the high-level and fare medium analyses were run a second time with a dataset that excluded riders from Big Lake and Elk River. The goal was to identify what the fare impacts would be if only trips within Metro Transit's statutory service area were considered. In both analyses, no disparate impacts or disproportionate burdens were identified (Table 13). This result adds some nuance to the primary findings.

Table 13. Average Change in Fare Comparison – Excluding Big Lake and Elk River

Group	High-Level Analysis	Fare Medium Analysis
Total	-13.0%	-10.0%
BIPOC	-26.5%	-19.8%
Non-BIPOC	-8.2%	-6.5%
Disparate Impact Index	**3.22**	**3.06**
Low-Income	-13.3%	-10.6%
Non-Low-Income	-11.0%	-9.0%
Disproportionate Burden Index	**1.22**	**1.17**

Source: 2022 TBI Onboard Survey and Metro Transit farebox data

Discussion

Adjusting fares to match Metro Transit's existing policies for express and local routes is a necessary component of the transition from rail to bus service in the Northstar corridor. Two different analysis methods of proposed fare changes associated with the Northstar transition each arrived at the same conclusion: the benefits to BIPOC riders would be greater than the benefits to non-BIPOC riders, resulting in a finding of no disparate impact. However, the benefits to low-income riders would be lower than the benefits to non-low-income riders. Therefore, the expected difference in benefits crosses Metro Transit's threshold for a disproportionate burden on low-income populations.

All riders would experience either no change or a decrease in estimated fare paid. Because passengers at Big Lake and Elk River are assumed to drive to Ramsey Station to catch Route 888, their formerly distance-based fare – as high as $6.25 – decreases to the same rate paid by closer-in residents. This fact appears to benefit non-low-income riders disproportionately. In a supplementary analysis excluding these stations, the potential for a disproportionate burden is not observed.

However, it should be noted that driving to Ramsey Station would incur additional personal vehicle mileage and associated costs. Using the IRS mileage rate of $0.70 per mile and a station-to-station distance, this equates to an added cost of $12.18 for riders from Big Lake (17.4 miles) and $4.69 for riders from Elk River (6.7 miles). The effective cost for any Northstar passengers who continue using the replacement bus service may be greater than the fare analysis suggests.

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 or fare change that meets the transit agency's major service change threshold. Metro Transit and the Metropolitan Council are proposing to suspend current rail service and replace with bus service in the Northstar commuter rail corridor in response to the rail line experiencing fairly low ridership while requiring relatively high operating costs. The proposal includes both service changes and associated fare changes. A two-part analysis examined both the service equity and fare equity impacts of this proposal.

Service Equity Analysis

The service equity analysis reviewed the percentage change and absolute change in weekly scheduled transit trips in the future scenario. Results from the percentage-based service analysis (summarized in Table 14) indicate that the average resident in the service change area would receive about a 12.4 percent increase in service. On average, BIPOC residents would benefit slightly less than non-BIPOC residents (10.5 percent increase in weekly service vs. 13.4 percent), and low-income residents would benefit slightly less than non-low-income residents (10.8 percent increase in weekly service vs. 12.8 percent). The absolute change in service followed a similar pattern.

Table 14. Service Change Impacts

Measure	BIPOC	Non-BIPOC	Low-Income	Non-Low-Income
Percent Change in Average Fare	+10.5%	+13.4%	+10.8%	+12.8%
Comparison Index		0.78		0.84
Potential for Disparate Impact / Disproportionate Burden?	0.78 < 0.9	Yes	0.84 < 0.9	Yes

The comparison indices for both disparate impact and disproportionate burden were under the 0.90 threshold set by Metro Transit and the Met Council. Based on these results, the service equity analysis found:

- **potential for disparate impact** to BIPOC riders as a result of the proposed service changes, and
- **potential for disproportionate burden** on low-income riders as a result of the proposed service changes.

Fare Equity Analysis

The second part of the analysis reviewed the extent to which the changes in average fare differ between BIPOC riders and non-BIPOC riders, and between low-income riders and non-low-income riders as a result of the proposed fare changes. Two separate analysis methods were used: a high-level approach and a more detailed approach based on fare medium distribution by route. The detailed analysis (summarized in Table 15) found that the average rider would experience a 15.2

percent fare decrease. BIPOC riders would experience larger fare decreases than non-BIPOC riders (20.7 percent versus 13.8 percent). However, low-income riders would experience a smaller decrease of 13.2 percent compared to 17.4 for non-low-income riders.

Table 15. Fare Change Impacts

Measure	BIPOC	Non-BIPOC	Low-Income	Non-Low-Income
Percent Change in Average Fare	-26.3%	-14.5%	-15.6%	-17.9%
Comparison Index		1.82		0.87
Potential for Disparate Impact / Disproportionate Burden?	1.82 > 0.9	No	0.87 < 0.9	Yes

The comparison index for disproportionate burden was under the 0.90 threshold. Both fare analyses arrived at the same conclusions:

- **no disparate impact** to BIPOC riders as a result of proposed fare changes, but
- **potential for disproportionate burden** on low-income riders as a result of proposed fare changes.

Discussion

A major service change that results in a disparate impact or disproportionate burden 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 or disproportionate burden while still accomplishing the transit provider's legitimate program goals.

The proposed replacement bus service aims to ensure that connections that can currently be made via Northstar can continue to be made via bus service, in most cases with increased service frequency and availability. The changes would ultimately result in greater service availability in the areas in which Metro Transit can legally operate buses while increasing the efficiency and effectiveness of transit operations in this portion of the Twin Cities region. The long-term reduction in annual operating costs would provide substantial opportunities to re-allocate funds to higher ridership routes.

In considering alternatives that would have a lesser impact, the cause of the disparate impact and disproportionate burden must be more closely examined. One of the key causes of the service impact is added bus service in a new, urbanized area east of the Mississippi River and south of Interstate 694. The change from commuter rail to local bus service allows for this area to be served. Modifying the proposal to avoid serving this area would likely reduce disparate impact or disproportionate burden based on the area demographics; however, simply not stopping along this segment of the corridor would not fundamentally improve service for BIPOC or low-income residents.

The finding of a disparate impact or disproportionate burden is itself dependent on the method. While the analysis methods yielded results indicating potential disparate impact and disproportionate

burden, other factors must be considered to gain a full understanding of the effects of these service changes.

- The Census-based methodology for service equity analysis includes the demographics of the population living near stops and stations regardless of whether those residents use transit or not, while potentially excluding riders who use a route to connect to jobs and services beyond their home census blocks. The planned enhancements to Route 852 would benefit a ridership is that is a higher percentage BIPOC and low-income than service area residents.
- The fare equity analysis includes all riders on the current Northstar line, including those outside the statutory service area who would face substantial costs to reaching the replacement Route 888 at its terminus in Ramsey. If these costs were factored in, or these riders were excluded, there would be no evidence of a disproportionate burden.

Metro Transit and Metropolitan Council leadership will consider the findings of this service and fare equity analysis before determining next steps.

Metro Transit

INTERNAL MEMO

Date: 10/30/2025

To: Ryan O'Connor, Regional Administrator

From: Lesley Kandaras, General Manager
Adam Harrington, Director-Service Development

RE: 2024 Service Equity Analysis

Since 2020, Metro Transit has committed to completing an annual Title VI Service Equity Analysis (SEA) to improve transparency of service-related decisions. The annual Title VI SEA is retrospective and cumulative, reviewing service changes over a 12-month period to understand the potential for disparate impact to BIPOC populations and/or disproportionate burden to low-income populations.

This memorandum, which serves as a letter of acknowledgment, summarizes relevant FTA Title VI requirements and 2024 SEA results. **Metro Transit requests your approval of the 2024 SEA findings of no disparate impact (DI) or disproportionate burden (DB) as a result of 2024 service changes.**

FTA Circular 4702.1B and Council Policies

Title VI compliance typically requires an SEA for each major service change; due to the large volume of service changes since the COVID-19 pandemic, Metro Transit completes an annual SEA to reflect cumulative effects of all service changes occurring in a calendar year. Council Policy 6.1 defines a Major Service Change, and Policy 6.2 outlines the Council's Disparate Impact and Disproportionate Burden (DI/DB) Policy threshold.

SEA Results

Detailed 2024 SEA methodology and results are available. This method measures access from residential/home census tracts, not accounting for locations served outside those census tracts on transit routes or connecting network. **Between December 2023 and December 2024, Metro Transit increased service overall, benefitting BIPOC, white, low-income, and non-low-income residents.** These service increases were distributed across the service area, affecting urban and suburban routes.
Adverse/beneficial effects of service changes were measured as negative/positive net changes in service availability near residents, calculated as the percent change in trips available and the absolute change in trips available. The difference between percent change in service availability suggests the potential for DI, but absolute change does not suggest DI/DB.

Additional background and evidence explain this discrepancy:

- **Percent change and absolute change metrics are sensitive to service contexts.** On average, BIPOC and low-income residents were likelier to reside near Urban Local routes and/or frequent routes serving many trips daily, where a small change in percent of trips represents a large volume of service. Conversely, white and non-low-income residents were more likely to live near infrequent or suspended service, where any amount of added service is a large percent change.
- **In 2024, Metro Transit was still restoring service previously reduced in 2020-2022.** This dramatically improved several suburban and connecting routes with the addition of a relatively limited volume of trips.
    - Restorations included bringing back service days or service windows that were completely suspended. Such restorations included weekday service on Route 223, weekend service on Route 46, and midday service on Route 25.
    - Route 805 Saturday service, which was severely reduced but not suspended, was restored to hourly frequency.
- **Between 2023 and 2024, BIPOC and low-income residents gained more absolute service availability, but BIPOC residents had a lower percent increase compared to white residents.** Service was improved on several frequent routes and transitways with a higher baseline of service, such as METRO Blue Line, Green Line, and Orange Line, and Route 54.

Therefore, based on the SEA results, wider service change context, and additional analysis, **Metro Transit's conclusion is that 2024 service changes did not result in potential DI/DB.**

Next Steps

Metro Transit requests your approval of the 2024 SEA findings of no disparate impact or disproportionate burden as a result of cumulative service changes in 2024. The 2024 Service Equity Analysis report and acknowledgment letter will be included in the upcoming Title VI Plan update, which the Council will submit to the FTA in 2025.

Acknowledgment and Signatures

The initials and signatures of the following parties acknowledge that they have reviewed this memo and approve it for use in the upcoming Title VI plan update being submitted to the FTA in 2025.

Printed Name: Adam Harrington
Director, Service Development
Signature: Adam Harrington Date: Oct 31, 2025

Printed Name: Lesley Kandaras
General Manager, Metro Transit
Signature: Lesley Kandaras Date: Dec 15, 2025

Printed Name: Ryan O'Connor
Regional Administrator, Metropolitan Council
Signature: Ryan T. O'C Date: Dec 16, 2025

Date: October 7, 2025

To: Cyndi Harper, Metro Transit

Victoria Dan, Metro Transit

From: SRF Consulting Group, Inc.

RE: Title VI Service Equity Analysis – December 2024

Introduction

This memo summarizes an analysis of Metro Transit's service changes from December 2023 to December 2024 to understand how service availability – or access to transit – may have changed for residents and the extent to which impacts differ between Black, Indigenous, and people of color (BIPOC) and white non-Hispanic residents, and between low-income and non-low-income residents. While this type of annual review is not required by the Federal Transit Administration (FTA)'s Title VI guidance, methods for evaluating major service changes defined in Metro Transit's Title VI Policy were used in this evaluation. Metro Transit's Title VI Policy has a threshold of 90 percent:

- Disparate impact occurs when BIPOC residents experience less than 90 percent of benefits relative to white non-Hispanic residents.
- Disproportionate burden occurs when low-income residents experience less than 90 percent of benefits relative to non-low-income residents.

If evidence of disparate impact or disproportionate burden are found, mitigation strategies should be identified.

Between December 2023 and December 2024, Metro Transit increased service overall. Larger service changes included a restoration of service on Route 223 and restoration of weekend service on Route 46. This document summarizes the effects of these and other service changes on different demographic groups.

Summary of Findings

This analysis compares transit service levels between December 2023 and December 2024. Results have been tabulated in two ways. The first determines the average percent change in service availability per person and the second determines the average absolute change in number of weekly trips available per person. The percent change method highlights areas where service has been restored, and the absolute change method highlights service additions where high trip volumes already exist.

Results of the percent change analysis show that the average resident served by Metro Transit experienced a 3.5 percent increase (30 trips) in the number of weekly scheduled trips available near their home between 2023 and 2024. For BIPOC and low-income populations, the analysis found:

- The average white non-Hispanic resident experienced a 3.6 percent increase in service (27 weekly trips), while the average BIPOC resident experienced a 3.2 percent increase in service (33 weekly trips). Applying the Title VI framework, these results suggest:
    - **A potential for disparate impact on BIPOC residents** on a percentage basis because BIPOC residents experienced 88 percent of the benefit relative to white residents.
    - **No disparate impact on BIPOC residents** on an absolute basis because BIPOC residents experienced 122 percent of the benefit relative to white residents.
- Similarly, the average non-low-income resident experienced a 3.5 percent increase in service (26 weekly trips), while the average low-income resident experienced a 3.3 percent increase (35 weekly trips). Applying the Title VI framework, these results suggest:
    - **No disproportionate burden on low-income residents** on a percentage basis because low-income residents experienced 93 percent of the benefit relative to non-low-income residents.
    - **No disproportionate burden on low-income residents** on an absolute basis because low-income residents experienced 132 percent of the benefit relative to non-low-income residents.

Methodology

The methodology section describes how each group of impacted residents is defined, how the service change calculation is made, and the definitions of disparate impact and disproportionate burden per Metro Transit's Title VI Policy.

Impacted Residents

This analysis was conducted as defined in Metro Transit's Title VI Policy. Metro Transit defines low-income residents as those in households earning less than 185 percent of the federal poverty threshold. Additionally, Metro Transit defines residents within its service area as living:

1. Within ¼ mile or a 5-minute walk from regular route bus stops, or
2. Within ½ mile or a 10-minute walk from transitway stops (these include light rail, commuter rail, and bus rapid transit stops)

This analysis used network distances (or walksheds) to determine residents of the service area. Residents in Census blocks with centroids within the predefined time thresholds from stops were counted. This analysis was conducted in the R programming environment using American Community Survey (ACS) 5-Year Estimates for the years 2019 through 2023. ACS data include demographics data required for this analysis (race and income categories) which are not included in block-level Census data. Because ACS data are only available to the block group level, areal interpolation was used to estimate block-level demographics.

Service Change Calculation

The number of transit trips serving each Census block were counted for weeks containing the following dates:

- 2023: December 6, 2023
- 2024: December 11, 2024

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 the blocks in the service change area, and dividing that sum by the total BIPOC population for the blocks in the service change area. The formula used for these analyses is shown below:

$$Avg\ \%\ \Delta = \frac{\sum(Population_i \times Percent\ Change_i)}{\sum Population_i}$$

Where:

$Population_i$ = Target population of Census block i.

$Percent\ Change_i$ = Percent change in service levels for Census block i.

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

The calculation for average absolute change in trips is consistent with the average percent change. The key difference is that instead of percent change in a Census block, the absolute number of weekly trips was used.

Definition of Disparate Impact and Disproportionate Burden

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. In 2022, Metro Transit updated its disparate impact and disproportionate burden policies and thresholds from the "80 percent rule" to a threshold of 90 percent which states that there may be evidence of disparate impact if:

- *Benefits* are being provided to BIPOC populations at a rate less than 90 percent of the benefits being provided to non-BIPOC populations, or
- *Adverse effects* are being borne by non-BIPOC populations at a rate less than 90 percent of the adverse effects being borne by BIPOC populations.

The same framework is used when evaluating whether low-income populations have experienced disproportionate burden relative to the impacts on non-low-income populations. Metro Transit's decision to use the 90 percent rule for its disparate impact and disproportionate burden thresholds was subject to a formal public outreach process before being adopted by the Metropolitan Council.

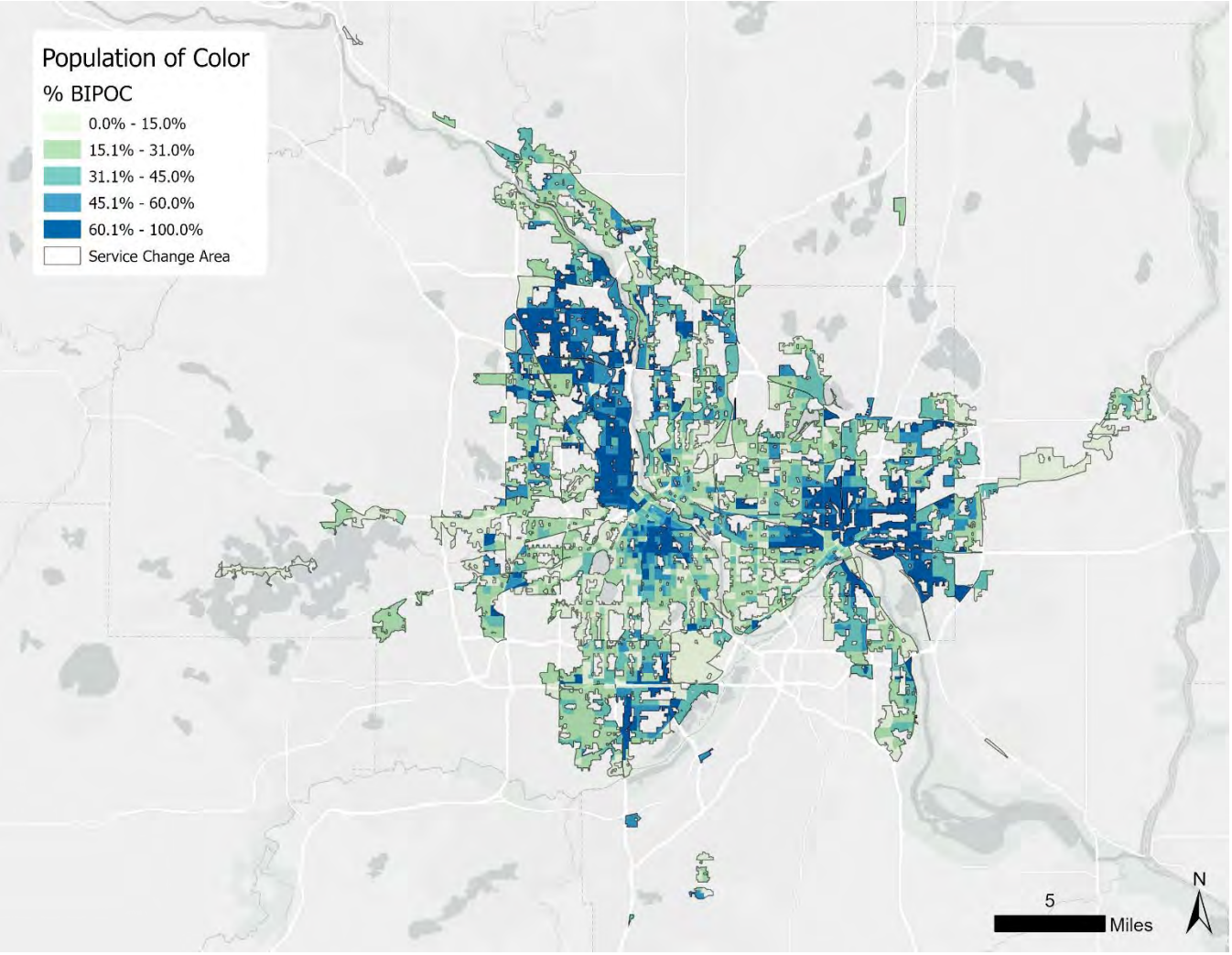
Results

The results section describes how demographic groups are distributed in the service area, as context for the following discussion of results. It then describes service change impacts by demographic group, both as a percentage change and as an absolute number of weekly trips. Maps of service changes by Census block are provided as supporting information.

Impacted Groups

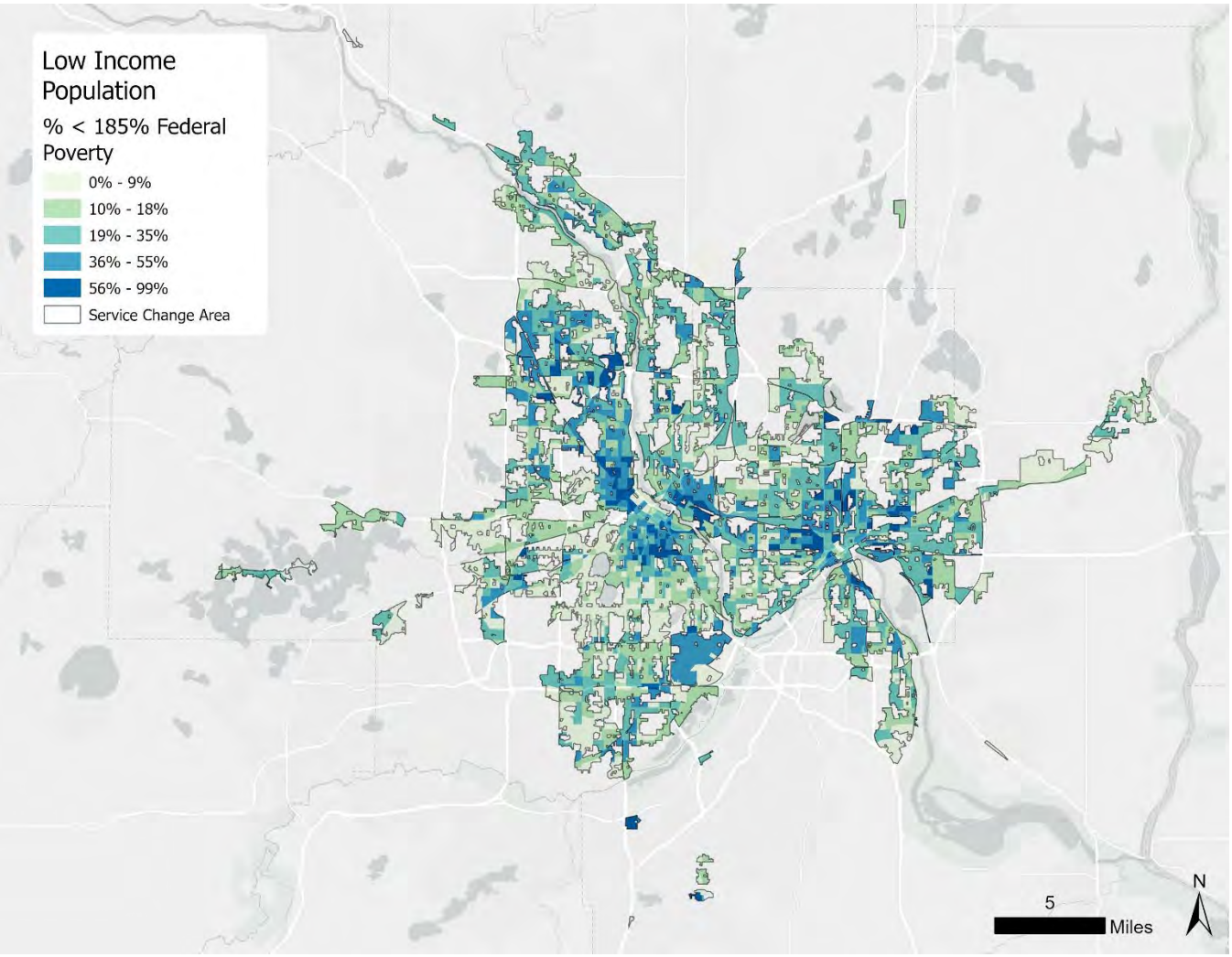
Figure 1 and Figure 2, respectively, show the distribution of BIPOC and white residents and low-income and non-low-income residents, by Census block, within the area served by all network fixed routes. The service equity analysis applies to these residents for both comparisons.

Figure 1. Residents served by Metro Transit fixed routes: BIPOC populations



Source: 2019-2023 American Community Survey 5-Year Estimates, Table C16001. Areally interpolated to Census blocks.

Figure 2. Residents served by Metro Transit fixed routes: low-income populations



Source: 2019-2023 American Community Survey 5-Year Estimates, Table C16001. Areally interpolated to Census blocks.

December 2023 to December 2024 One-Year Percentage Change

The average person living in the area served by fixed routes – regardless of race, ethnicity, or low-income status – experienced a 3.5 percent increase in transit service when comparing December 2023 to December 2024 service levels. During this time, the average BIPOC resident experienced a 3.2 percent increase in available service, while the average white resident experienced an increase of 3.6 percent (Table 1 and Figure 3). The service increase for the average BIPOC resident was 88 percent of the increase for the average white resident. Because BIPOC residents benefited at a rate less than 90 percent of the benefit to non-BIPOC residents, this analysis identifies **a potential for disparate impact on BIPOC residents** as a result of the overall changes in service in 2024.

The average low-income resident in the area served by fixed routes experienced a 3.3 percent increase in transit service during 2024, while the average non-low-income resident experienced a 3.5 percent increase (Table 1). The service increase for the average low-income resident was 93 percent of the increase for the average non-low-income resident. Because low-income residents benefited at a rate

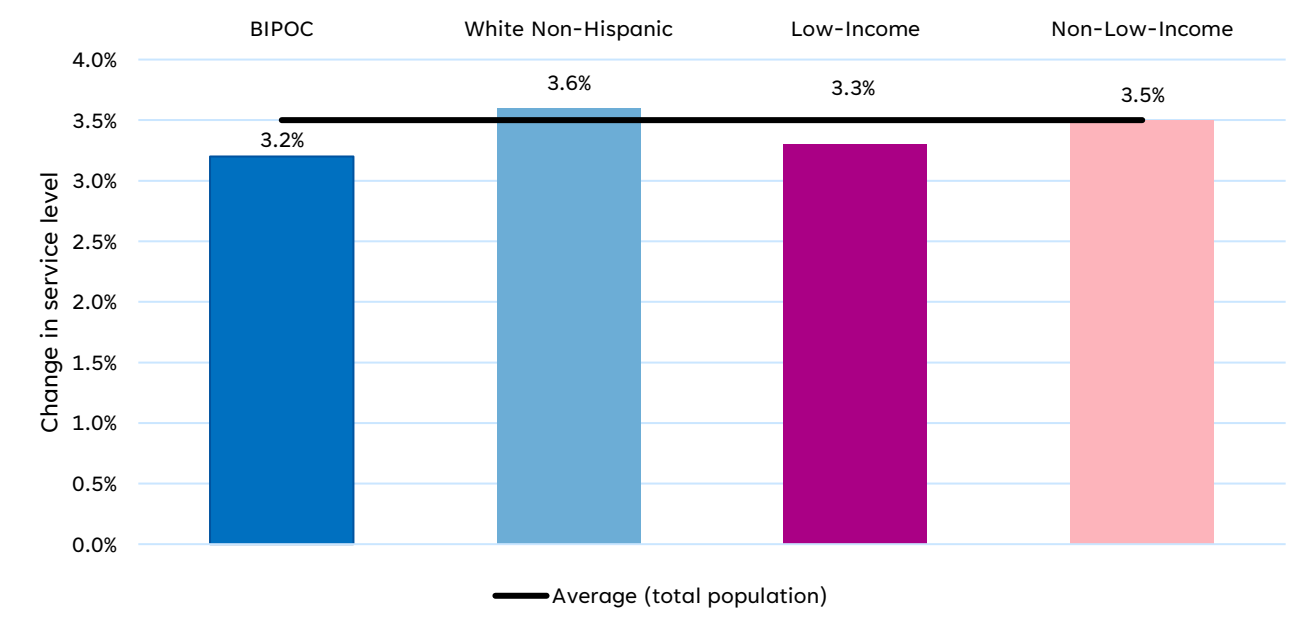
greater than 90 percent, this analysis identifies **no potential for disproportionate burden on low-income residents** as a result of the overall change in service from December 2023 to 2024.

Table 1. Average percent change in service: December 2023 to December 2024 service changes

Population group	Average percent change in service
Communities of color	3.2%
White non-Hispanic	3.6%
Disparate impact comparison index	0.88 < 0.90, thus, disparate impact
Low-income	3.3%
Non-low-income	3.5%
Disproportionate burden comparison index	0.93 > 0.90, thus, no disproportionate burden
Total population	3.5%

Source: SRF analysis of Metro Transit and Census data.

Figure 3: Average percent change in service: December 2023 to December 2024 service changes

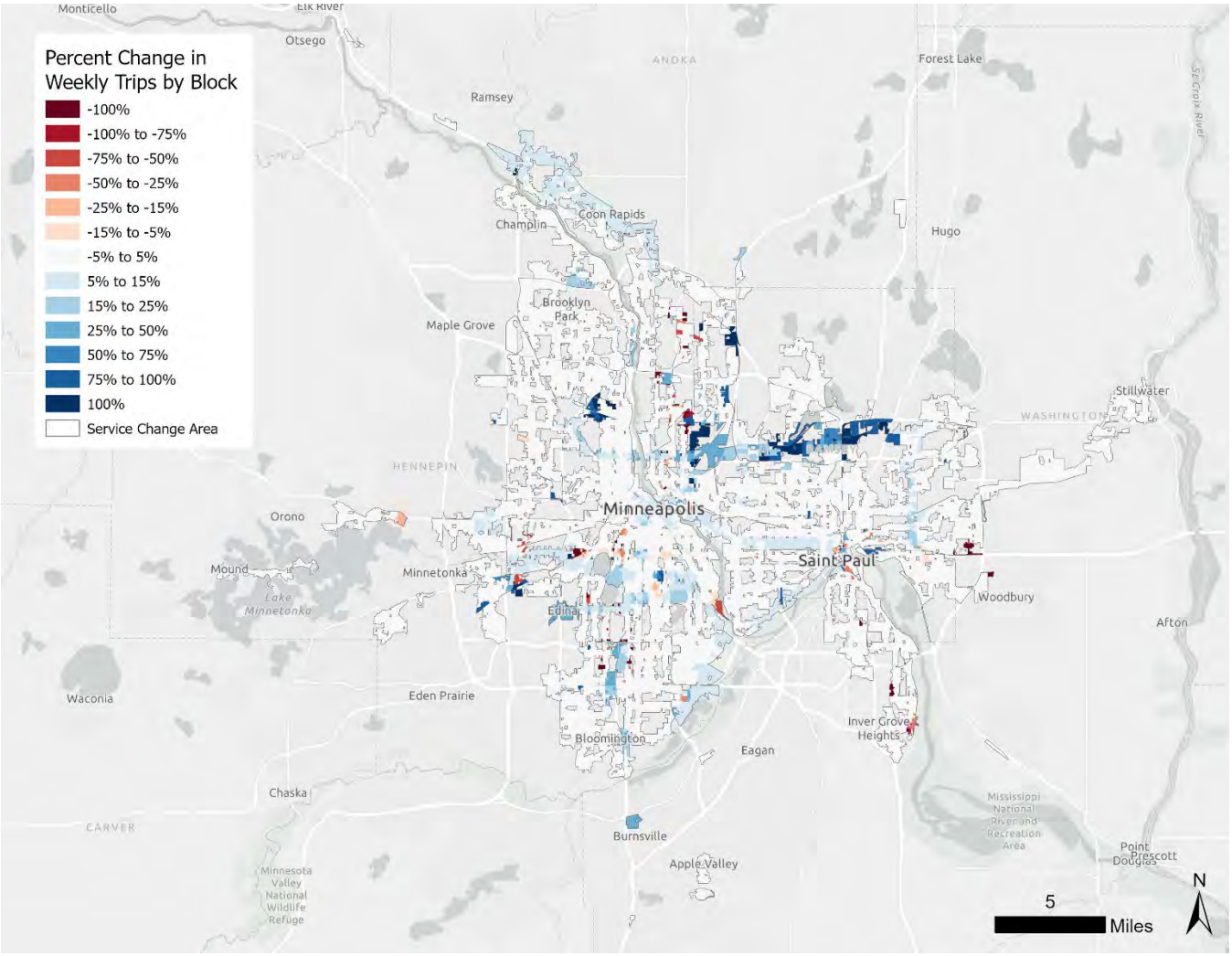


Source: SRF analysis of Metro Transit and Census data.

The percent change in service levels from December 2023 to December 2024, by Census block, is shown in Figure 4. As the map indicates, the blocks with the largest percent increases in service tend to be in northeast Minneapolis, north of Saint Paul, and outlying, more suburban areas, which have a lower proportion of low-income populations and people of color (see Figure 1 and Figure 2).

The blocks with the largest percentage decreases in service are mostly small, spread across the region, and tend to be in locations where minor or temporary changes were made. These include construction detours; bus stop consolidation; and minor routing adjustments. Areas with the most significant service reduction are highly concentrated and do not follow full route alignments. Most of the service area had little to no change year over year.

Figure 4. Percent change in service by Census block, December 2023 to December 2024



Source: SRF analysis of Metro Transit and Census data.

December 2023 to December 2024 One-Year Absolute Change

The absolute change in service was calculated using a similar methodology to percentage change. However, rather than the average percentage increase or decrease in weekly trips, the change in average number of weekly trips was measured.

Table 2 shows the results of this calculation. The average person living in the area served by fixed routes – regardless of race, ethnicity, or low-income status – had an additional 30 weekly trips available when comparing December 2023 to December 2024 service levels. During this time, available weekly trips increased by 33 for the average BIPOC resident, 27 for the average white resident, 35 for the average low-income resident, and 26 for the average non-low-income resident.

When absolute change is used as the basis for impact determinations, there is neither a disparate impact nor a disproportionate burden.

Table 2. Average absolute change in service: December 2023 to December 2024 service changes

Population group	Average absolute change in service (number of trips)
Communities of color	+33
White non-Hispanic	+27
Disparate impact comparison index	1.22 > 0.90, thus, no disparate impact
Low-income	+35
Non-low-income	+26
Disproportionate burden comparison index	1.32 > 0.90, thus, no disproportionate burden
Total population	+30

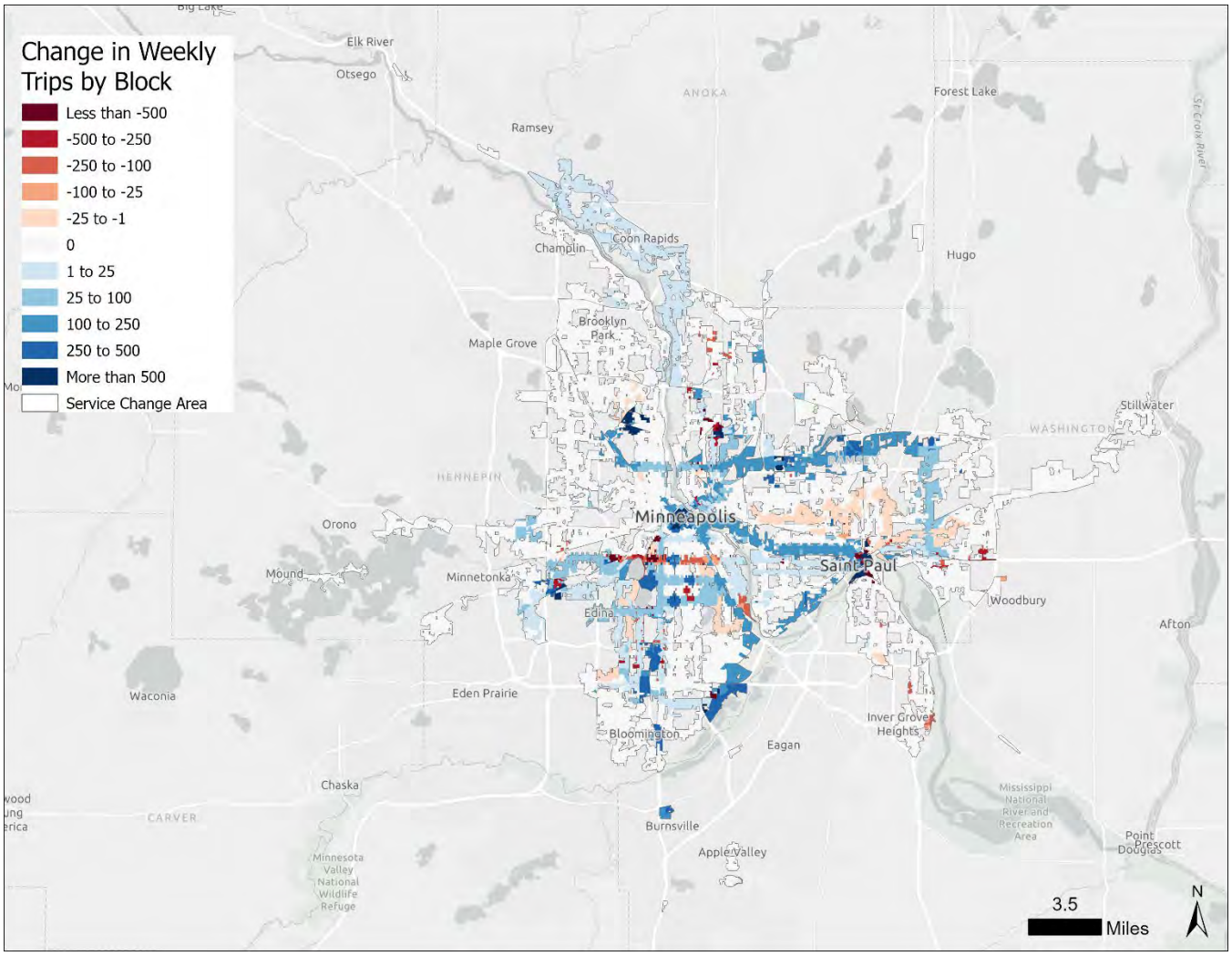
Source: SRF analysis of Metro Transit and Census data.

The distribution of absolute changes in service availability is shown in Figure 5. In contrast to the percentage changes in service shown in Figure 4, absolute increases in trip counts by block are spread across the metro area and tend to follow corridors, particularly along the METRO Green Line, METRO Blue Line, Route 32, Route 223, and across the south metro area. Notably, downtown Minneapolis shows a small area with a relatively large absolute increase in weekly trips, even though the percentage increase in that area was less notable. This is likely due to the high density of routes in that area providing a high level of service baseline.

The largest absolute decreases in trips shown in Figure 5 are along the Route 21 corridor, where service availability was affected by school trip adjustments, rerouting near Uptown Station, and long-term construction of Minnetonka Blvd., County Rd. 25 (old Hwy. 7) and Lake St. W. North Saint Paul shows relatively large decreases in absolute trip counts by block, even though that area showed minimal changes on a percentage basis.

On an infrequent route, the addition or removal of a small number of trips can result in a large percentage change, while larger absolute changes in service availability in the more densely served urban core may translate to a relatively small percentage change. This will be discussed further in the following section.

Figure 5. Absolute change in service by Census block, December 2023 to December 2024



Source: SRF analysis of Metro Transit and Census data.

Discussion

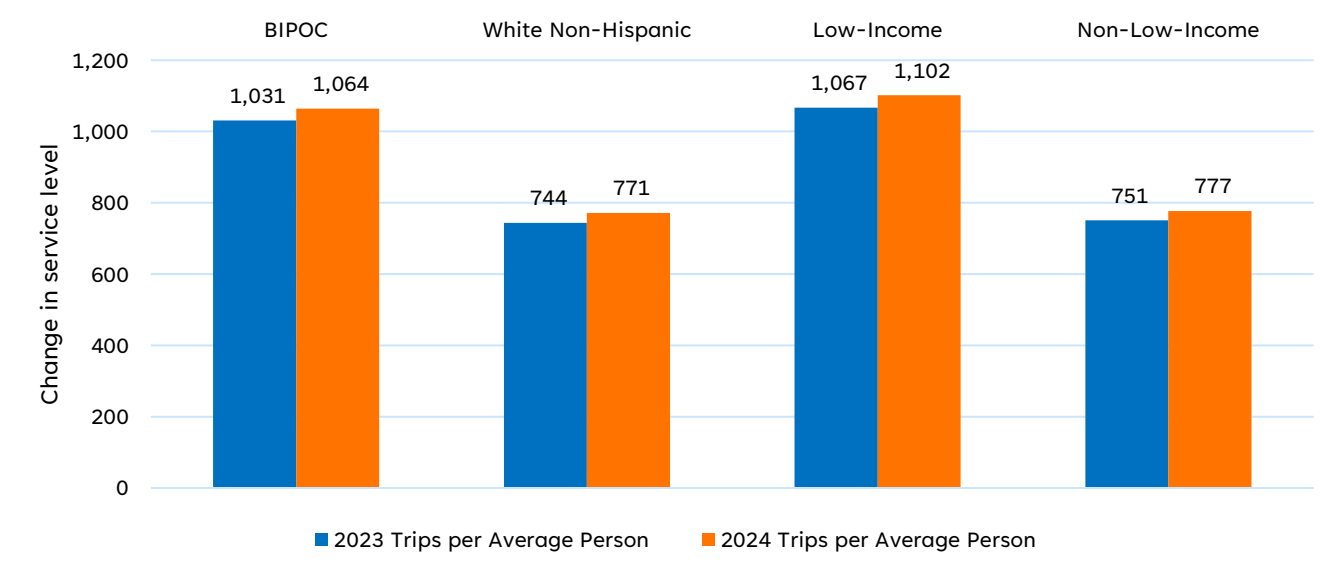
While Metro Transit's Title VI Policy evaluates the *change* in service availability, it is also helpful context to understand the *actual* service available to each demographic group.

The service change analysis between 2023 and 2024 yields different outcomes when considered on a percentage basis versus an absolute basis. On an absolute basis, the increase in trips benefited BIPOC and low-income residents more than white non-Hispanic and non-low-income residents. However, on a percentage basis, the results reverse and show that the increase in trips benefit BIPOC and low-income residents at only 88 and 93 percent of the benefit to white non-Hispanic and non-low-income residents, respectively. This is due to the baseline number of weekly trips each demographic group had available in December 2023.

As shown in Figure 6, the average BIPOC and low-income resident within the service area had significantly more trips in 2023 than the average white non-Hispanic and non-low-income resident did in 2023. For example, the average BIPOC resident was served by 1,031 weekly trips in 2023 while the average white non-Hispanic person was served by 744 weekly trips. This results in the average BIPOC resident having 39 percent more service than the average white non-Hispanic person in the service area. A similar ratio exists when looking at income groups as well as looking at 2024 trip counts.

These results indicate that the change in availability of service from 2023 and 2024 does not indicate the need for mitigation.

Figure 6. Weekly trips available to the average person by demographic group, December 2023 to December 2024



Source: SRF analysis of Metro Transit and Census data.

Conclusion

The purpose of service equity analysis is to ensure that BIPOC residents do not experience a disparate impact, and low-income residents do not experience disproportionate burden when changes are made to transit service. While potential disparate impact was identified when considering impacts on a percentage basis from December 2023 to December 2024, additional analyses show this not to be the case.

When considering service changes for BIPOC and white non-Hispanic populations by residential location:

- BIPOC residents experienced an average increase of 33 weekly trips (3.2 percent)
- White non-Hispanic residents experienced an average increase of 27 weekly trips (3.6 percent)

Both groups experienced an overall increase in service. Areas with the highest *percent* increase in service tended to occur on routes with relatively low levels of service as a baseline and in areas with fewer BIPOC residents (Figure 1 and Figure 4). That said, the largest absolute increases in service availability occurred in neighborhoods where higher concentrations of BIPOC residents live (Figure 1 and Figure 5). Furthermore, overall, BIPOC residents had access to significantly more service compared to white non-Hispanic residents in 2023 and 2024 (Figure 6).

When considering service changes for low-income and non-low-income populations by residential location:

- Low-income residents experienced an average increase of 35 weekly trips (3.3 percent)
- Non-low-income residents experienced an average increase of 26 weekly trips (3.5 percent)

In a similar pattern to BIPOC versus white non-Hispanic residents, high service increases on a percentage basis tend to occur in areas without high concentrations of low-income residents. However, when looking at the change on an absolute basis, the areas that received a larger increase in weekly trips tended to be in areas where low-income residents live. It's also worth noting that overall, areas where low-income residents live are served by significantly more trips than areas where non-low-income residents live in both 2023 and 2024.

In considering the change in service from 2023 to 2024, this analysis finds that mitigation is not necessary to remove disparate impact and disproportionate burden.

Attachment H: Approved Service Monitoring Evaluation

Metro Transit

INTERNAL MEMO

Date: May 23, 2025

To: Ryan O'Connor, Regional Administrator

From: Lesley Kandaras, General Manager
Adam Harrington, Director-Service Development

RE: 2024 Service Monitoring Study

Metro Transit's 2024 Service Monitoring Study satisfies a Title VI requirement by the Federal Transit Administration (FTA) to monitor transit system performance once every three years. The purpose of service monitoring is to ensure that prior decisions related to the distribution of fixed route transit service and facilities have not resulted in a disparate impact or disproportionate burden to BIPOC or low-income communities, respectively. This retrospective study focuses on service and amenities as of Fall 2023, including directly operated and contracted fixed route.

This memorandum, which serves as a letter of acknowledgment, summarizes FTA Title VI requirements and service monitoring results. **Metro Transit requests your approval of the Service Monitoring Study findings.**

FTA Circular 4702.1B and Council Policies

The FTA requires recipients of federal funding who provide fixed-route service to develop and monitor quantitative system standards and policies to guard against discrimination. In other words, Metro Transit must ensure that system performance is similar or better for areas, routes, and stops serving predominantly BIPOC and low-income populations compared to white and non-low-income populations. Metro Transit must monitor the following metrics:

- **Vehicle load:** How crowded are buses and trains?
- **Vehicle headway:** How often does the bus or train arrive?
- **On-time performance:** How much does service delivery adhere to schedules?
- **Service availability:** How appropriately are routes and stops spaced? How sufficient is midday service?
- **Distribution of transit amenities:** How fair is access to bus shelters, customer information, and other facility amenities?
- **Vehicle assignment:** How fair is distribution of new vehicles among routes?

The Council's Title VI Program, last updated in 2022, defines standards and policies used by Metro Transit for service monitoring. Policy 6.2 outlines the Council's Disparate Impact and Disproportionate Burden (DI/DB) Policy threshold.

Monitoring Results

Detailed service monitoring methodology and results are available (see attached report). Across all six standards and policies, BIPOC and low-income populations generally showed equivalent or better outcomes compared to white and non-low-income populations.

The sole exception was for *unwarranted* heating in shelters, which describes bus stops with shelter heaters where daily boardings were low enough to consider removing this amenity. *Unwarranted* heat was more common among stops that mainly benefited white and/or non-low-income residents. Many such stops warranted heat pre-COVID, lost ridership during the pandemic, and did not sufficiently recover ridership by 2023. Metro Transit continues to monitor ridership should these stops return to "warranted" status. Notably, *unwarranted* heat includes downtown stops shared with suburban providers that do not provide stop-level ridership data, so a warrant analysis may mis-categorize heat as *unwarranted* based on undercounted boardings. To further adapt practices to current travel behaviors, in 2024 Metro Transit updated its bus stop amenity placement guidelines to reflect lower amenity warrants. These new thresholds will apply to the next service monitoring study.

Therefore, service monitoring identifies no disparate impact nor disproportionate burden. See Table 1 below.

Table 1. 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		
Route Spacing	No	No
Midday Service	No	No
Stop Spacing	No	No
Distribution of Amenities		
At Bus Stops	No*	No*
At Transit Centers	No	No
At Stations	No	No
Vehicle Assignment	No	No

*No disparate impacts or disproportionate burdens identified for amenities warranted by Metro Transit service standards.

Next Steps

Metro Transit requests your approval of the Service Monitoring Study findings of no disparate impact nor disproportionate burden related to the provision and quality of service and amenities. The Service Monitoring Study report and acknowledgment letter will be included in the upcoming Title VI Plan update, which the Council will submit to the FTA later in 2025.

Acknowledgment and Signatures

The initials and signatures of the following parties acknowledge that they have reviewed this memo and approve it for use in the upcoming Title VI plan update being submitted to the FTA in 2025.

Printed Name: Adam Harrington
Director, Service Development
Signature: Adam Harrington
Date: 05/23/2025

Printed Name: Lesley Kandaras
General Manager, Metro Transit
Signature: Lesley Kandaras
Lesley Kandaras (May 23, 2025 14:58 CDT)
Date: 05/23/2025

Printed Name: Ryan O'Connor
Regional Administrator, Metropolitan Council
Signature: Ryan O'Connor
Date: 05/28/2025

2024 Title VI Service Monitoring Study

In Compliance with FTA Circular 4702.1B

April 2025

Prepared for:

Metro Transit

Prepared by:

SRF

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 2021.

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 Minority Populations and Low-Income Populations*, extends these protections to low-income communities as well.[1] **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."[2]**

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."[3] While not specifically required by FTA, Metro Transit expands its service monitoring to include assessment of disproportionate burden on low-income populations.

To meet the Title VI service monitoring requirement, Metro Transit fixed-route service and facilities data from fall 2023, as well as the latest residential and rider demographic data, are compiled and analyzed relative to Metro Transit's established service standards and policies. Documented in the

[1] 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. Accessed February 12, 2025. This executive order was revoked in President Donald Trump's January 21, 2025 *Executive Order 14173: Ending Illegal Discrimination and Restoring Merit-Based Opportunity*. However, FTA guidance has not changed; nor has the Civil Rights Act of 1964.

[2] 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.

[3] FTA, *Circular 4702.1B,* page IV-10.

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 fall 2023. 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. Any routes that were suspended in 2023 are thus not included in the analysis.

Title VI Definitions and Concepts

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. 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 "minority" when referring to people who identify as one or more of the above racial or ethnic groups.** References to BIPOC 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. 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 percent of the 2022 U.S. Census Bureau poverty thresholds to determine low-income status. The Council uses 185 percent 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.[4]

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.[5]

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

> a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations.[6]

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 "90 percent rule," which states that there may be evidence of disparate impact if:

- *Benefits* are being provided to BIPOC (minority) populations at a rate less than 90 percent of the benefits being provided to white populations, or
- *Adverse effects* are being borne by white populations (non-minority) at a rate less than 90 percent 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 90 percent rule represents a modification of Metro Transit's previous practice, which drew on the 80 percent rule originating in employment law.[7] The percentage threshold is a practical way to identify 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.

The most recent Title VI Program update changed the threshold of disparate impact and disproportionate burden from 80 to 90 percent in order to further Metro Transit's equity goals. Metro

---

[4] 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.
[5] FTA, *Circular 4702.1B*, page I-2
[6] FTA, *Circular 4702.1B*, page I-2
[7] 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.

Transit's decision to use the 90 percent 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 2022. Additional information about the policies and their applications can be found in the Council's current Title VI Program.[8]

Route, Stop, and Area Designations

This analysis uses U.S. Census Bureau 2018-2022 American Community Survey 5-year estimates in the following ways:

- Designate each census block group within the Metro Transit service area as either a BIPOC area or a non-BIPOC area and either a low-income area or a non-low-income area.
- Designate each route as either BIPOC or non-BIPOC and either low-income or non-low-income depending on the block groups it crosses. (Route designations are further refined using route-specific ridership data from the Metropolitan Council's Transit Behavior Inventory On-Board Survey.)
- Designate each stop and station as either BIPOC or non-BIPOC and either low-income or non-low-income depending on the block group(s) in its walkshed.

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

Table i 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. All analyses were performed on service data from fall 2023.

[8] Metropolitan Council, *Title VI Program*, October 2022, https://metrocouncil.org/About-Us/Publications-And-Resources/EQUAL-OPPORTUNITY-DOCUMENTS/TITLE-VI-DOCUMENTS/Title-VI-Compliance-and-Implementation-Plan.aspx.

Table i. Summary of Service Standards and Policies and their Analysis Results

Standard/Policy	What does it address?	What are the results?
Vehicle Load	Metro Transit's standards for what constitutes an "overloaded" (too crowded) vehicle accounts for seated and standing passengers and differs by route type and vehicle type	Trips scheduled on BIPOC routes were only slightly less often within applicable load standards than those on non-BIPOC routes (99.7% versus 99.9%). Consistent overload was minimal on both BIPOC and non-BIPOC routes. Therefore, this analysis identifies **no disparate impact based on vehicle load**. Trips scheduled on low-income routes were slightly less often within load standards than those on non-low-income routes (99.7% versus 99.8%). Consistent overload was minimal on low-income and non-low-income routes. Therefore, this analysis identifies **no disproportionate burden based on vehicle load.**
Vehicle Headway	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. Metro Transit's vehicle headway standards are based on the route type, day period, and Transit Market Area.	BIPOC routes overall had higher vehicle headway compliance rates than non-BIPOC routes. Off-peak bus headways were 93% compliant on BIPOC routes compared with 95% for non-BIPOC routes. Therefore, this analysis identifies **no disparate impact based on vehicle headway**. Low-income routes similarly had overall higher compliance rates than non-low-income routes, with lower off-peak bus compliance (93% versus 100%). Therefore, this analysis identifies **no disproportionate burden based on vehicle headway.**

Standard/Policy	What does it address?	What are the results?
On-Time Performance	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. 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.	On-time performance on BIPOC routes (with 79% of all timepoint observations on time) was 4% lower than on-time performance on non-BIPOC routes (83%). Therefore, this analysis identifies **no disparate impact based on on-time performance**. Similarly, low-income routes had 5% lower on-time performance compared to non-low-income routes (80% of timepoint observations versus 84%). Therefore, this analysis identifies **no disproportionate burden based on on-time performance**.
Service Availability: Route Spacing	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. 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?	Route spacing results indicated that both Market Area I and Market Area II are well covered by the existing local bus network according to the route-spacing standard. Coverage was near 100% for both market areas, and tended slightly higher for BIPOC and low-income populations than for non-BIPOC and non-low-income populations. Therefore, this analysis identifies **no disparate impact nor disproportionate burden based on route spacing.**
Service Availability: Midday Service	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 a 9-to-5 work commute. 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?	Universally across market areas, BIPOC and low-income populations were served by transit compliant to the midday service standard at higher rates than non-BIPOC and non-low-income populations. Therefore, this analysis identifies **no disparate impact nor disproportionate burden based on midday service availability.**

Standard/Policy	What does it address?	What are the results?
Service Availability: Stop Spacing	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. 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?	BIPOC routes and low-income routes each had stop spacing compliance rates 94% those of non-BIPOC routes and non-low-income routes. Therefore, this analysis identifies **no disparate impact nor disproportionate burden based on stop spacing.**
Distribution of Amenities: At Bus Stops, Transit Centers, and Stations	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.	For both BIPOC and low-income designated stops and stations, amenity placement at transit centers and at light rail, BRT, and commuter rail stations was equal to or better than placement at non-BIPOC and non-low-income stops and stations. Bus stop additionally had indices generally above 0.90, the one exception being disparate impacts and disproportionate burdens for *unwarranted* heating in shelters. These result from the redesignation of stops as unwarranted following post-pandemic ridership changes and are not understood to require mitigation. Therefore, this analysis **finds no disparate impacts or disproportionate burdens identified for amenities warranted by Metro Transit service standards.**

Standard/Policy	What does it address?	What are the results?
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?	Among bus routes, BIPOC routes were assigned older vehicles than non-BIPOC routes but did not reach the 90% threshold for disparate impact. When considered relative to the available fleet, vehicles assigned to BIPOC routes were newer on average. Therefore, **this analysis identifies no disparate impacts based on vehicle assignment**. Low-income trips were assigned vehicles slightly newer than those assigned to non-low-income trips. However, when considered relative to the available fleet, vehicles assigned to non-low-income routes were newer on average (2.62 years newer than the fleet average, compared to 1.99 for low-income route assignments). Because low-income routes are already assigned newer vehicles on average than non-low-income routes, there are diminishing returns to ensuring assigned vehicles are newer than the available fleet. Therefore, this analysis identifies **no disproportionate burden based on vehicle assignment**.

Conclusions

All measures of compliance with Metro Transit's service standards and policies showed that BIPOC and low-income populations received outcomes above the 90 percent threshold at which they are judged equivalent to non-BIPOC and non-low-income populations. In some cases, outcomes were better for BIPOC and low-income populations. Neither disparate impacts nor disproportionate burdens were identified for any metric, with the exception of *unwarranted* heating in bus shelters. This resulted from post-pandemic ridership changes rather than any action inconsistent with Metro Transit's policies, and it does not require mitigation. A summary of the findings is shown in Table ii.

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		
Route Spacing	No	No
Midday Service	No	No
Stop Spacing	No	No
Distribution of Amenities		
At Bus Stops	No*	No*
At Transit Centers	No	No
At Stations	No	No
Vehicle Assignment	No	No

*No disparate impacts or disproportionate burdens identified for amenities warranted by Metro Transit service standards.

TABLE OF CONTENTS

Executive Summary **2**

Chapter 1: Introduction **14**

Purpose 14

Extent of Analysis 15

Chapter 2: Legislation and Guidance **16**

Requirement to Conduct Service Monitoring 16

Title VI Definitions of Minority and Low-Income Populations 17

Discrimination, Disparate Impact, and Disproportionate Burden 19

Chapter 3: Service Monitoring Concepts and Definitions **21**

Concepts and Definitions to Establish Standards and Policies 21

Concepts and Definitions to Evaluate Compliance with Standards and Policies 22

Chapter 4: Analysis Standards, Methods, and Results **32**

Comparison Index 32

Vehicle Load 33

Vehicle Headway 36

On-Time Performance 38

Service Availability: Route Spacing 40

Service Availability: Midday Service 41

Service Availability: Stop Spacing 43

Distribution of Amenities 46

Vehicle Assignment 52

Summary of Results 56

Chapter 5: Conclusions **58**

Appendix A: Route Types **59**

Appendix B: Route Designations **61**

Appendix C: Transit Market Areas **64**

Appendix D: Route Designation Methodology **65**

Appendix E: Vehicle Load **69**

Appendix F: On-Time Performance **72**

Appendix G: Route Spacing **74**

Appendix H: Midday Service Availability **78**

Appendix I: Vehicle Assignment **81**

TABLE OF FIGURES

Figure 1. BIPOC Areas Within the Metro Transit Service Area 25
Figure 2. Low-Income Areas Within the Metro Transit Service Area 26
Figure 3. BIPOC Route Designation 29
Figure 4. Low-Income Route Designation 30
Figure 5. Systemwide Route-Stop Link Lengths Relative to Stop Spacing Standards 45
Figure 6. Average Age by Vehicle Type 53
Figure 7. Transit Market Areas in the Region 64
Figure 8. Market Area I – Local Route Spacing for BIPOC Block Groups 74
Figure 9. Market Area I – Local Route Spacing for Low-Income Block Groups 75
Figure 10. Market Area II – Local Route Spacing for BIPOC Block Groups 76
Figure 11. Market Area II – Local Route Spacing for Low-Income Block Groups 77
Figure 12. Midday Service Standards Compliance in Market Areas I, II and III – BIPOC Block Groups 79
Figure 13. Midday Service Standards Compliance in Market Areas I, II and III – Low-Income Block Groups 80

TABLE OF TABLES

Table 1. 2022 U.S. Census Bureau Poverty Thresholds (185%) in Dollars 19
Table 2. Title Measures and Corresponding Designation Methods 23
Table 3. Summary of Route Designations by Route Type 28
Table 4. Vehicle Load Standards 34
Table 5. Vehicle Load Standards Results 36
Table 6. Vehicle Headway Standards 37
Table 7. Vehicle Headway Standards Results 38
Table 8. On-Time Performance Standards Results 39
Table 9. Route Spacing Standards 40
Table 10. Route Spacing Results 41
Table 11. Off-Peak Vehicle Headway Standards 42
Table 12. Midday Service Availability Results 43
Table 13. Stop Spacing Standards 43
Table 14. Stop Spacing Standard Results: Route-Stop Links Meeting Standards 45
Table 15. Customer Amenities at Transit Stops Policies 46
Table 16. Summary of Stops Analyzed 48
Table 17. Customer Amenity Placement Rates at Bus Stops 50
Table 18. Customer Amenity Placement Rates at Stops at Transit Centers 51
Table 19. Customer Amenity Placement Rates at Stops at Light Rail, BRT, and Commuter Rail Stations 52
Table 20. Vehicle Assignment Policy Results, Measured by Average Vehicle Age (Years) 55
Table 21. Summary of Analysis Results 56
Table 22. Disparate Impact and Disproportionate Burden Results Summary 58
Table 23. Service Monitoring Routes by Type and Designations 61
Table 24. Routes with Race/Ethnicity Designation Modified Based on Ridership 66
Table 25. Routes with Income Designation Modified Based on Ridership 67
Table 26. Vehicle Overloads by Route 69
Table 27. On-Time Performance by Route 72
Table 28. Vehicle Age in Years by Route 81

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 45 million bus and rail passengers in 2023 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."[9]

While not specifically required by FTA, Metro Transit expands its service monitoring to include assessment of disproportionate burden on low-income populations.

To meet the Title VI service monitoring requirement, **service and facilities data from fall 2023, together with recent Census data, are compiled and analyzed relative to Metro Transit's established service standards and policies.**[10] 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: To ensure fair 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 and non-low-income routes (or stops or areas).

---

[9] 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.

[10] 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.

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 fall 2023. Metro Transit 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. The analysis thus does not include any routes that were suspended in fall 2023.

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.

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."[11]

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."[12]

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."[13]

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.[14] 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

[11] 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.
[12] 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. Accessed February 12, 2025. This executive order was revoked in President Donald Trump's January 21, 2025 *Executive Order 14173: Ending Illegal Discrimination and Restoring Merit-Based Opportunity*. However, FTA guidance has not changed; nor has the Civil Rights Act of 1964.
[13] 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.
[14] FTA, *Circular 4702.1B*.

> serving different routes, and location of routes may not be determined on the basis of race, color, or national origin."[15]

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.[16]

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 2021.

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) rather than "minority" when referring to people who identify as one or more of the above racial or ethnic groups.** References to BIPOC in this report should be interpreted to mean the same 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. 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. 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.

---

[15] 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.

[16] FTA, *Circular 4702.1B*, page IV-4

[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.

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 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 using other established measures that are at least as inclusive as those developed by HHS.

Correspondingly, this Title VI service monitoring analysis uses 185 percent of the 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.[18]

The Metropolitan Council uses 185 percent 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. Table 1 lists 185 percent of the 2022 U.S. Census Bureau poverty thresholds that are used in this analysis.

[18] 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. 2022 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 ($)	No Children	One Child	Two Children	Three Children	Four Children	Five Children	Six Children	Seven Children	Eight Children or More
One Person (Unrelated Individual)	27,528									
Under 65 Years	28,176	28,166								
65 Years & Over	25,974	25,967								
Two People	34,965									
Householder Under 65 Years	36,427	36,254	37,318							
Householder 65 Years & Over	32,764	32,725	37,176							
Three People	43,068	42,350	43,579	43,619						
Four People	55,408	55,844	56,756	54,904	55,097					
Five People	65,694	67,344	68,324	66,232	64,613	63,623				
Six People	74,296	77,458	77,765	76,163	74,627	72,342	70,990			
Seven People	84,527	89,126	89,682	87,764	86,426	83,936	81,030	77,841		
Eight People	94,369	99,680	100,560	98,749	97,164	94,912	92,056	89,083	88,328	
Nine People or More	111,555	119,908	120,489	118,887	117,542	115,333	112,293	109,544	108,863	104,669

Source: U.S. Census Bureau; 100% of the 2022 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 *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.[20]

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

[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

a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations.[21]

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 "90 percent rule," which states that there may be evidence of disparate impact if:

- *Benefits* are being provided to BIPOC (minority) populations at a rate less than 90 percent of the benefits being provided to white populations, or
- *Adverse effects* are being borne by white populations (non-minority) at a rate less than 90 percent 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 90 percent rule represents a modification of Metro Transit's previous practice, which drew on the 80 percent rule originating in employment law.[22] The percentage threshold is a practical way to identify 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.

The most recent Title VI Program update changed the threshold of disparate impact and disproportionate burden from 80 to 90 percent in order to further Metro Transit's equity goals. Metro Transit's decision to use the 90 percent 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 2022. Additional information about the policies and their applications can be found in the Council's current Title VI Program.[23]

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 90 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 32.

[21] FTA, *Circular 4702.1B*, page I-2

[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.

[23] Metropolitan Council, *Title VI Program*, October 2022, https://metrocouncil.org/About-Us/Publications-And-Resources/EQUAL-OPPORTUNITY-DOCUMENTS/TITLE-VI-DOCUMENTS/Title-VI-Compliance-and-Implementation-Plan.aspx.

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 of 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 types into several of its service standards and policies.

Route types represented among the 95 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.

This analysis uses the Transit Market Areas as they were defined in the Metropolitan Council's *2040 Transportation Policy Plan*,[24] which would have been in effect in Fall 2023. The then-current map of Transit Market Areas in the region is included in Appendix C: Transit Market Areas of this report.

Future service planning will be guided by the adjusted Transit Market Area map in the *2050 Transportation Policy Plan*, which was adopted in early 2025.[25]

Concepts and Definitions to Evaluate Compliance with Standards and Policies

As described in preceding chapters, the Title VI standards and policies that apply to Metro Transit are evaluated using set measures. Each of these measures requires the designation of a given route, stop/station, or geographic area as being either BIPOC or non-BIPOC and either low-income or non-low-income. For example, the passenger load standard is applied to route-level average loads, so it relies on the designation of each route in the system.

Table 2 lists each of the metrics used in this analysis alongside the designation used to compare outcomes by race and income. Each designation method is then described in detail. The standards it is used for are also briefly described but will be defined and discussed further in Chapter 4: Analysis Standards, Methods, and Results.

[24] Metropolitan Council (2015) *2040 Transportation Policy Plan*. https://metrocouncil.org/Transportation/Planning-2/Key-Transportation-Planning-Documents/Transportation-Policy-Plan/The-Adopted-2040-TPP-(1).aspx

[25] Metropolitan Council (2025) *2050 Transportation Policy Plan*. https://metrocouncil.org/Transportation/Planning-2/Key-Transportation-Planning-Documents/Transportation-Policy-Plan.aspx

Table 2. Title Measures and Corresponding Designation Methods

Title VI Measure	Designation Used
Route spacing	Demographic area
Midday service availability	Demographic area
Passenger load	Route
Vehicle headway	Route
On-time performance	Route
Stop/station spacing	Route
Vehicle assignment	Route
Distribution of amenities	Stop/station

Demographic Area Designations

FTA *Circular 4702.1B* establishes the following concept that is critical for conducting service monitoring in compliance with FTA requirements:

> *Predominantly minority area* means a geographic area, such as a neighborhood, Census tract, block or block group, or traffic analysis zone, where the proportion of minority persons residing in that area exceeds the average proportion of minority persons in the recipient's service area.[26]

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).

Data and Methods

This study uses U.S. Census Bureau 2018-2022 American Community Survey 5-year estimates at the block group level to determine the Metro Transit service area averages for percent BIPOC residents (33.5 percent) and percent low-income residents (20.5 percent).

In keeping with Metro Transit's preferred terminology, **"predominantly minority areas" are herein referred to as "BIPOC areas,"** and are defined as census block groups where BIPOC residents make up at least 33.5 percent 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 34 percent of census block groups and 19 percent of the geographic (surface) area of the Metro Transit service area and are home to 37 percent 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 20.5 percent of residents, the average across Metro Transit's service area. Low-income areas within the Metro Transit service area are shown in Figure 2. Low-income areas make up 35 percent of census block groups

[26] FTA, *Circular 4702.1B*, page I-5. 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

and 23 percent of the geographic area of the Metro Transit service area and are home to 36 percent of the service area's total population.

Service Standards

The demographic area designation applies to route spacing and midday service availability. Route spacing is an entirely geographic measure: it identifies locations where parallel routes of the same type are spaced out according to standards, and locations where the distance between routes does not meet standards. Midday service availability similarly identifies locations where standards for midday frequency are met and where they are not met.

Figure 1. BIPOC Areas Within the Metro Transit Service Area

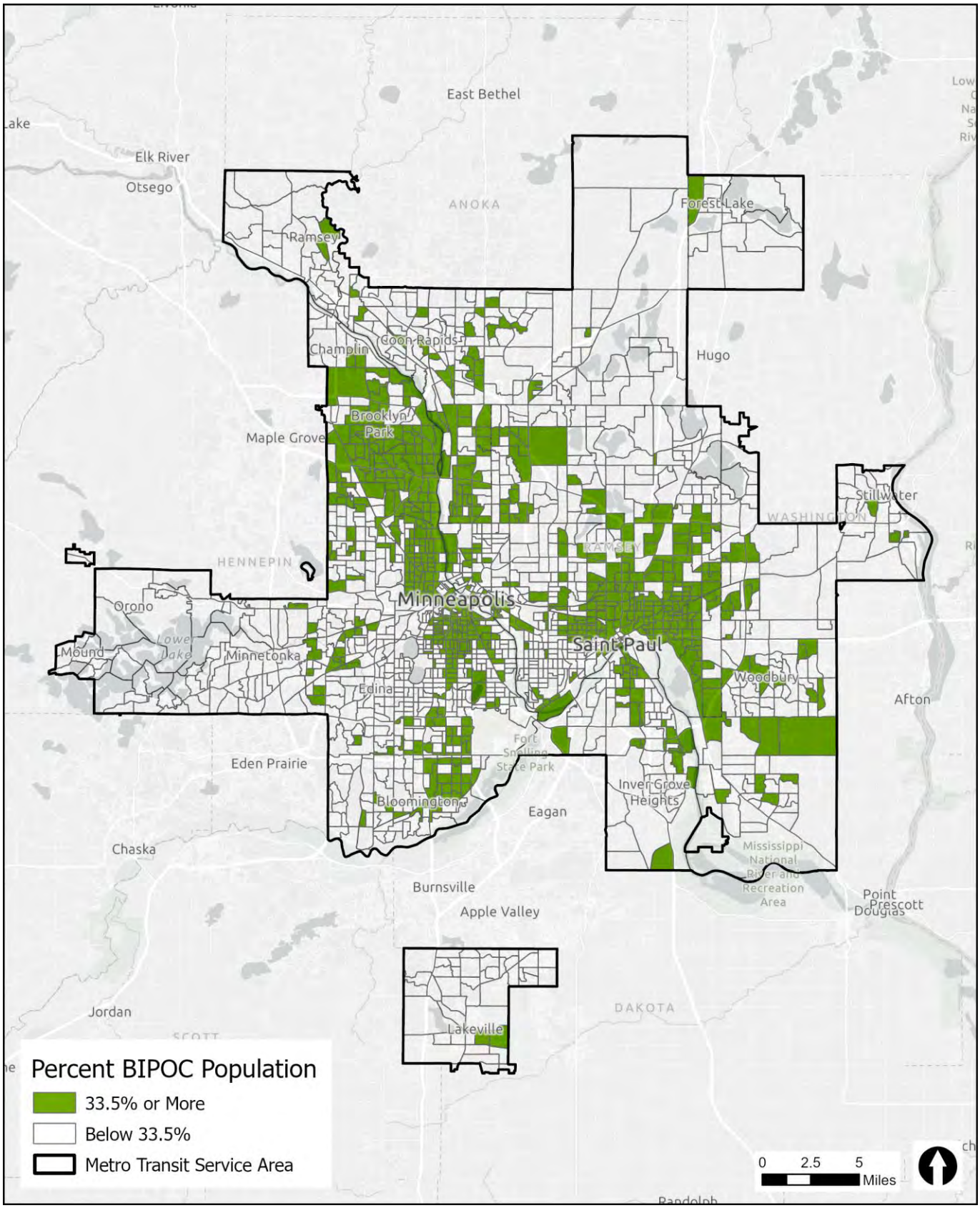
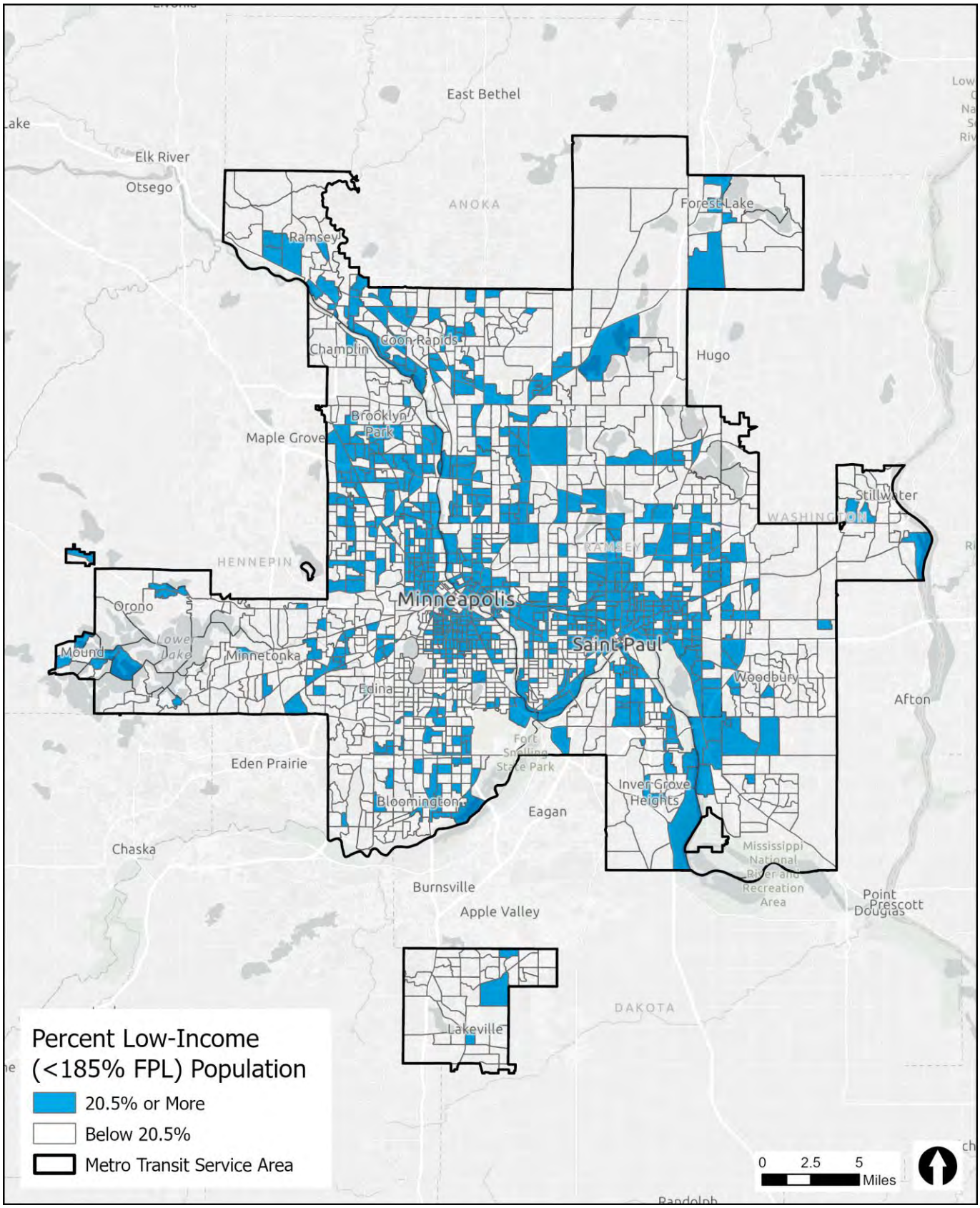


Figure 2. Low-Income Areas Within the Metro Transit Service Area



Route Designations

FTA *Circular 4702.1B* also establishes the concept of a minority transit route:

> *Minority transit route* means a route that has at least 1/3 of its total revenue mileage in a Census block or block group, or traffic analysis zone(s) with a percentage of minority population that exceeds the percentage of minority population in the transit service area.[27]

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.

Data and Methods

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, 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.

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.[28] 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, such that routes are designated as BIPOC routes if their ridership is greater than or equal to the service area average of 33.5 percent BIPOC, and likewise as low-income routes if their ridership is greater than or equal to the service area average of 20.5 percent low-income. FTA's route designation methodology was also modified to eliminate non-stop route segments. A detailed description of the methodology used to designate routes in this study is included in Appendix D: Route Designation Methodology.

As summarized in Table 3, 78 percent of the 95 routes included in this study are considered BIPOC routes, while 84 percent 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 (80-100 percent of routes) compared to commuter and express routes (54-81percent of routes).

Figure 3 and Figure 4 display maps of all BIPOC/non-BIPOC and low-income/non-low-income route designations, respectively. See Appendix B: Route Designations for a list of all 95 routes analyzed in this study alongside their designations.

[27] FTA, *Circular 4702.1B*, page I-4.

[28] FTA, *Circular 4702.1B*, page I-4.

Table 3. Summary of Route Designations by Route Type

Route Type	Number of Routes	BIPOC	Non-BIPOC	Low-Income	Non-Low-Income
Core Local	25	96%	4%	100%	0%
Supporting Local	10	80%	20%	100%	0%
Suburban Local	26	58%	42%	92%	8%
Commuter and Express	26	81%	19%	54%	46%
Arterial BRT	3	67%	33%	100%	0%
Highway BRT	2	50%	50%	100%	0%
Light Rail	2	100%	0%	100%	0%
Commuter Rail	1	100%	0%	0%	100%
All Routes	95	78%	22%	84%	16%

Service Standards

The route designation applies to standards for passenger load, vehicle headway, on-time performance, stop/station spacing, and vehicle assignment. The standards for a given route will vary based on the route's type and market area.

Figure 3. BIPOC Route Designation

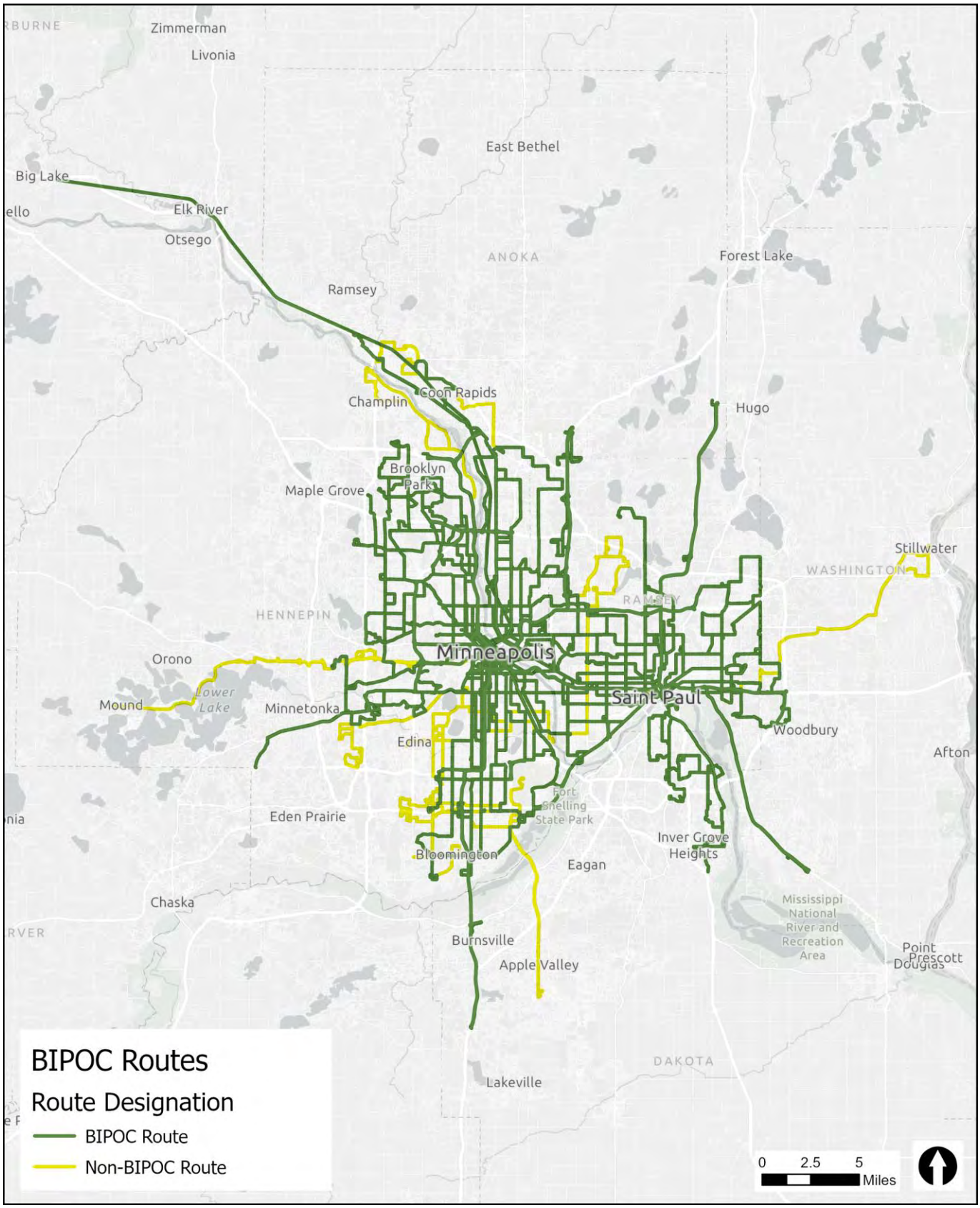
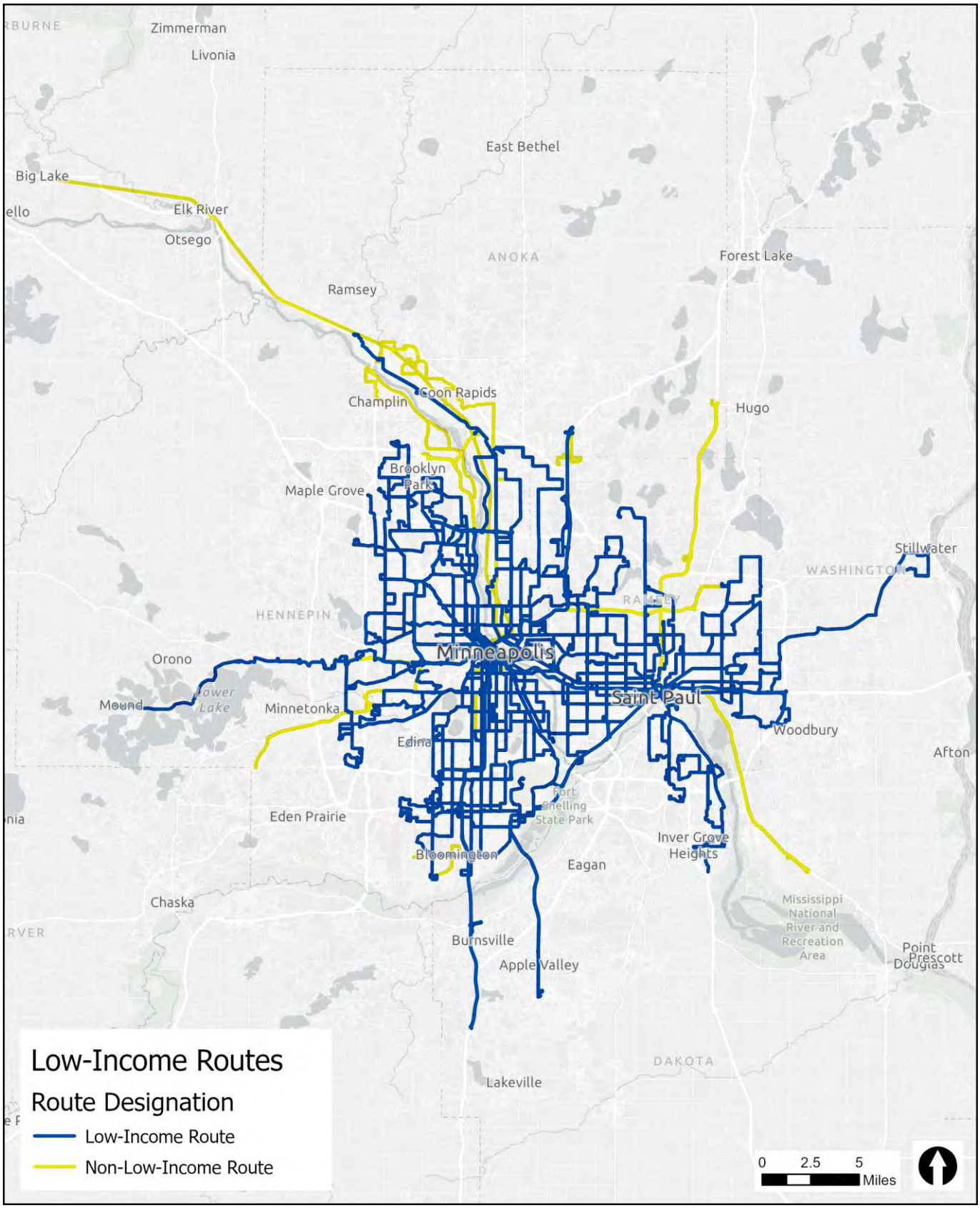


Figure 4. Low-Income Route Designation



Stop Designations

Finally, FTA requires agencies to include the distribution of transit amenities in service monitoring. In the absence of more detailed guidance, Metro Transit applies its amenity standards to individual stops and stations.

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 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 **8,409 stops served by Metro Transit routes in fall 2023. 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.

Data and Methods

FTA does not prescribe a particular method for designating stops; the method used in this study categorizes stops based on their relationship to the demographics of the area they serve. Specifically, if the proportion of BIPOC residents within a 10-minute walk from a given station is at or above the service area average (33.5 percent in this study), it is designated as a BIPOC stop. So too if the proportion of low-income residents within a ten-minute walk is at or above the service area average (20.5 percent in this study), it is designated as a low-income stop. Forty-eight percent of stops included in this study are considered BIPOC stops, while 54 percent are considered low-income stops.

The proportion of each demographic group served by a given station or stop is determined by apportioning block-group level census data from the 2018-2022 American Community Survey to ten-minute walksheds calculated using the existing street and sidewalk network. Walksheds are calculated for a hexagonal grid across the Metro Transit service area with each cell measuring 150 feet in diameter. Each station or stop is considered in isolation, with no regard to the routes that serve it or to any other nearby stops. This method only considers the demographics for the station or stop as a residential starting point and does not reflect the demographics of riders for whom the station or stop is a non-home destination.

Service Standards

The stop designation applies to standards for transit amenities. These standards are defined separately for separate facility types, and they help the agency plan and prioritize investments. They are described in detail in Chapter 4: Analysis Standards, Methods, and Results.

CHAPTER 4: ANALYSIS STANDARDS, 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.

The study includes all 95 fixed routes and 8,409 stops and stations that operated in fall 2023. This includes 30 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).[29]

Route-level 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. While route designations do not vary between light rail routes, individual stop designations still differ based on the demographics in the surrounding area. Thus, comparison indices are calculated for light rail stations where analysis is conducted at the stop level (e.g. amenities distribution).

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., route spacing), 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-minority/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 0.90 indicates the potential for disparate impact/disproportionate burden.**

[29] 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 to 9:00 AM and 3:00 to 6:30 PM) and off-peak periods (Table 4). 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 4. 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 2021.

This analysis considers weekdays during fall 2023. Weekdays are used given the reduced demand and rarity of overloads on weekend days. 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 4) 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 hypothetical weekday trip on Route 99 departing at 7:45 AM) had load observations for 72 weekdays across fall 2023.

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 hypothetical 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 trip observations that are not *overloaded*, i.e. the proportion of all observed completed trips that do not exceed overload standards at some point during the trip; and
- Percent of scheduled trips that are not *consistently overloaded,* such that an individual route trip has no more than 40 percent of its observed completed trips (e.g., 23 out of 55 trip observations) 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 2023, just 0.26 percent of all observed bus trips are overloaded. The analysis results by route designation are summarized in Table 5. Vehicle load results by route are included in Appendix E: Vehicle Load.

The percentage of trips on BIPOC routes that are within the load standard is slightly lower than that of non-BIPOC routes (99.7 percent compared to 99.9 percent), but the resulting comparison index of 1.00 **indicates no disparate impacts based on vehicle load for overall trip observations**. Similarly, the percentage of trips on low-income routes that are within the load standard is slightly lower than that of

non-low-income routes (99.7 percent compared to 99.8 percent). The resulting comparison index of 1.00 also **indicates no disproportionate burdens based on vehicle load for overall trip observations**.

Scheduled trips with consistent overload are exceptionally few. Across 5,651 scheduled trips observed in this analysis, only three exceed the 40 percent threshold for consistent overload. All three of these trips were on BIPOC and low-income routes. For BIPOC routes, 99.9 percent of scheduled trips saw no consistent overload, compared to 100 percent of non-BIPOC routes. The resulting comparison index of 1.00 would indicate that **there are no disparate impacts associated with consistent overloads**. Similarly for low-income routes, 99.9 percent of scheduled trips see no consistent overload compared to 100 percent of non-low-income routes, giving a comparison index of 1.00 that also indicates **there are no disproportionate burdens associated with consistent overload**.

Table 5. Vehicle Load Standards Results

Mode	Route Designation	Percent of Weekday Trip Observations within Load Standard	Percent of Scheduled Weekday Trips Consistently within Load Standard
Bus	BIPOC Routes	99.7%	99.9%
	Non-BIPOC Routes	99.9%	100.0%
	DI Comparison Index	**1.00**	**1.00**
	Low-Income Routes	99.7%	99.9%
	Non-Low-Income Routes	99.8%	100.0%
	DB Comparison Index	**1.00**	**1.00**

*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 BIPOC and non-low-income route, thus, there is no comparison index

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 6, vehicle headway standards differ by route type, day period (peak, off-peak, and weekend), and Transit Market Area. Peak is defined as weekday trips mainly occurring between 6:00 and 9:00 AM or between 3:00 and 6:30 PM. Off-peak encompasses trips mainly occurring during the remaining time during weekdays, and weekend applies to all trips throughout the day on Saturdays and Sundays.

Table 6. 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

Vehicle headways are calculated using general transit feed specification (GTFS) schedule data from a representative week in October of 2023. For each route and stop combination in the system, the total number of trips arriving and departing is calculated by service day (e.g. weekday, Saturday, Sunday) and time period (e.g. peak, off-peak). Trip counts for each route and stop are categorized under three representative periods:

- Peak: Weekday trips occurring between 6:00 and 9:00 AM and between 3:00 and 6:30 PM
- Off-Peak: Weekday trips occurring between 11:00 AM and 2:00 PM
- Weekend: Saturday and Sunday trip occurring between 11:00 AM and 2:00 PM

Each route-stop combination is classified by the type of route serving it and the Transit Market Area in which it is located, in order to compare it against the vehicle headway standards defined by Metro Transit. The number of trips by route at each stop within a given time period is divided by the length of the period in minutes, producing an estimate of the average headway experienced at that stop.

This calculation is compared against Metro Transit's vehicle headway standards to assign a value of "compliant" if the average headway is less than or equal to the appropriate standard, or "non-compliant" is the average headway is greater than the standard. For route type – market area

combinations that do not have a defined standard (e.g. commuter rail stops within Market Area I), stops are considered compliant if any trips serve the stop within the given period.

Results are then aggregated to the route level and route designation (e.g. BIPOC route versus non-BIPOC route) as the percent of stops on the route that are considered compliant with the associated headway standard. 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 7 summarizes the percent of route-stop combinations meeting vehicle headway standards by mode, route designation, and service period for fall 2023.

Table 7. Vehicle Headway Standards Results

Mode	Route Designation	Peak	Off-Peak	Weekend	Total
Bus	BIPOC Routes	41%	93%	43%	55%
	Non-BIPOC Routes	41%	95%	28%	50%
	DI Comparison Index	**1.00**	**0.98**	**1.52**	**1.11**
	Low-Income Routes	44%	93%	42%	56%
	Non-Low-Income Routes	9%	100%	0%	22%
	DB Comparison Index	**4.88**	**0.93**	**121.71**	**2.50**
Light Rail*	BIPOC Routes	100%	100%	100%	100%
	Low-Income Routes	100%	100%	100%	100%
Commuter Rail^	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 BIPOC and non-low-income route, thus, there is no comparison index

In 2023, BIPOC bus routes had higher compliance rates than non-BIPOC routes in the peak and weekend periods, as well as in total. BIPOC routes saw slightly lower compliance rates in the off-peak service period than did non-BIPOC routes but were well above the 0.9 threshold and so did not result in disparate impacts. Low-income routes similarly saw higher compliance rates than non-low-income routes in the peak and weekend periods, as well as overall. Low-income routes had lower compliance rates than did non-low-income routes in the off-peak period but were above the 0.9 threshold and so did not result in disproportionate burdens.

On-Time Performance

Standards

On-time performance standards are consistent between bus and rail service. Service is considered on-time if it arrives at scheduled timepoints (for bus) or at stations (for rail) between 1 minute early and 5 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.

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 2023 are used in this analysis. The dataset used for analysis includes the number of on-time timepoint crossing observations, according to the on-time definition, 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.

Results

Table 8 summarizes the percent of timepoint crossings considered on-time for each mode by route designation in fall 2023. 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 or station arrivals meeting on-time performance standards

Mode	Route Designation	On-Time Performance
Bus	BIPOC Routes	79%
	Non-BIPOC Routes	83%
	DI Comparison Index	**0.96**
	Low-Income Routes	80%
	Non-Low-Income Routes	84%
	DB Comparison Index	**0.95**
Light Rail*	BIPOC Routes	75%
	Low-Income Routes	75%
Commuter Rail^	BIPOC Routes	70%
	Non-Low-Income Routes	70%

*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 BIPOC and non-low-income route, thus, there is no comparison index

Among bus routes, BIPOC routes had lower on-time performance than non-BIPOC routes in 2023, with 79 percent of trip timepoint crossings on time compared to 83 percent, respectively (Table 8). The resulting comparison index of 0.96 (0.79/0.83 = 0.96) is greater than the disparate impact threshold of 0.90. **Therefore, this analysis identifies no disparate impact based on on-time performance.**

Low-income bus routes had lower on-time performance (80 percent) than non-low-income routes (84 percent) in 2023. The resulting comparison index of 0.95 (0.80/0.84 = 0.95) is greater than the disproportionate burden threshold of 0.90. **Therefore, this analysis identifies no disproportionate burden based on on-time performance.**

Service Availability: Route Spacing

Standards

Route spacing refers to the distance between 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 standards 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

* Specific indicates that route structure is adapted on an ad-hoc basis to the demographics, geography, and land use of the specific area.

Metro Transit defines route spacing standards for core local, supporting local, and suburban local bus routes within Market Areas I and II. The functions of these route classifications relate to the demand and geography of each market:

- **Core local** routes typically serve the denser urban areas of Market Areas I and II, usually connecting downtown cores and major trip generators along important arterial and collector roads. They form the base of the Metro Transit bus network and are generally the most productive bus routes in the system.
- **Supporting local** routes comprise crosstown and feeder routes that typically connect areas of Market Areas I and II outside of the downtown cores. These routes generally connect to core local routes and ensure coverage for trips outside of traditional commuter patterns.
- **Suburban local** routes typically operate in Market Areas II and III in lower-density suburban areas and are often less productive than other route classifications. These routes serve to ensure riders in suburban areas have a baseline of mobility within their own communities.

The classification of individual routes is defined by Metro Transit and maintained in its production transit route data. Transit data from 2024 are used to define route classification for 2023, with no routes having changed classification in that time.

Methods

Analysis of compliance with route spacing standards is conducted using route shape data from GTFS data for a typical week in October 2023, as well as block group level demographic data from the 2018-2022 American Community Survey. Block groups are designated according to methodology outlined in the section Demographic Area Designations Block groups are additionally clipped to each market area, and the size of each block group is calculated in acres.

The total acreage of block groups within each market area is calculated by BIPOC and low-income designation, giving the denominator for later percentage calculations. Rather than evaluate route spacing individually between local route subclasses, this analysis considers route spacing for all local routes combined using the most stringent standard for each market area. Bblock groups in Market Area I are considered to be within the route spacing standard if any local route is within half a mile from the block group, and likewise within one mile for block groups in Market Area II. For each market area, block groups are clipped to the corresponding route buffers and market area boundary and have their acreage recalculated. The total acreage of the block groups within the route buffer is then divided by the total acreage of the block groups in the corresponding market area, filtering for each BIPOC and low-income designation. This process yields the percent of BIPOC, non-BIPOC, low-income, and non-low-income areas that fall within the route spacing standard. These percentages are then compared to assess disparate impact and disproportionate burden.

Results

The results of the route spacing analysis are shown in Table 10. Maps showing the coverage areas are included in Appendix G: Route Spacing.

Table 10. Route Spacing Results

Route Type	Designation	Market Area I	Market Area II
All Local Bus	BIPOC	100.0%	99.8%
	Non-BIPOC	99.0%	97.4%
	DI Comparison Index	**1.01**	**1.03**
	Low-Income	100.0%	98.8%
	Non-Low-Income	98.8%	97.9%
	DB Comparison Index	**1.01**	**1.01**

In Market Area I, local routes provide slightly more coverage to BIPOC and low-income populations, with nearly 100 percent of BIPOC and 100 percent of low-income residents falling within the half-mile service standard, giving a comparison index of 1.01 in both measures. **Therefore, no disproportionate burdens nor disparate impacts are identified for local routes in Market Area I.**

In Market Area II, local routes provided slightly more coverage to BIPOC and low-income populations than to non-BIPOC and non-low-income populations, giving indices of 1.01 and 1.03, respectively. **Therefore, no disparate impacts nor disproportionate burdens are identified for local routes in Market Area II.**

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 6). Metro Transit uses its off-peak vehicle headway standards to assess service availability during midday between weekday peak periods. Midday vehicle headway standards are summarized in Table 11.

Table 11. 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

The availability of midday service is evaluated based on the relative area served by stops compliant with the off-peak service standard. Similar to the methodology used in the vehicle headway analysis, GTFS data for a representative weekday in October 2023 is used to calculate the average headway experienced at each stop by taking the total number of trips served at each stop between 11:00 AM and 2:00 PM, then dividing 180 minutes by that total. In contrast to the method employed for the vehicle headway analysis, average headway is not calculated for each distinct route class, but rather for simplified categories of local bus and the grouping of arterial BRT, highway BRT, and LRT routes given that midday service standards only differ across these two categories. A stop is marked as compliant if its average off-peak headway is less than or equal to the corresponding service standard for its market area.

Compliant stops are then buffered one-quarter-mile for bus stops and one-half-mile for BRT, LRT, and commuter rail stations, based on the general propensity of users to walk farther for LRT and BRT stations. Block group level demographic data from the 2018-2022 ACS are clipped to these stop buffers, with each clipped block group then having its area recalculated. The total acreage of BIPOC, non-BIPOC, low-income, and non-low-income block groups within the buffer is compared to the corresponding total acreages of its market area. This process gives the percentage of BIPOC, non-BIPOC, low-income, and non-low-income areas served by transit compliant with the midday service standard.

Results

The results of the midday service analysis are shown in Table 12. Universally across market areas, BIPOC and low-income populations are served by transit compliant to the midday service standard at higher rates than non-BIPOC and non-low-income populations, with all comparison indices well over 1.00. **Therefore, this analysis identifies no disparate impact nor disproportionate burden based on midday service availability.**

Table 12. Midday Service Availability Results

Designation	Market Area I	Market Area II	Market Area III	Total
BIPOC	96%	79%	59%	69%
Non-BIPOC	83%	67%	42%	48%
DI Comparison Index	**1.15**	**1.17**	**1.40**	**1.42**
Low-Income	95%	78%	65%	73%
Non-Low-Income	81%	68%	41%	47%
DB Comparison Index	**1.18**	**1.15**	**1.60**	**1.56**

Service Availability: Stop Spacing

Standards

When considering stop spacing, service must balance the competing goals of maximizing access and minimizing travel times. A shorter distance between stops will reduce the average rider's walking distance to a stop but will generally increase the overall travel time of the route. A common standard for passengers' willingness to walk is one-quarter-mile for local bus service and one-half-mile for BRT and LRT services.

Metro Transit's recommended standards for stop spacing are shown in Table 13. These represent generalized goals as opposed to hard minimums or maximums, as various exceptions may be made based on conditions of the area served. For example, a BRT route may reduce stop spacing within central business districts or around major trip generators.

Table 13. 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

* 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.

The classification of individual routes is defined by Metro Transit and maintained in its production transit route data. Transit data from 2024 are used to define route classification in 2023, with no routes having changed classification in that time.

Methods

Analysis of stop spacing standards compliance uses stops and schedules derived from Metro Transit's schedule data in GTFS format from a representative week in fall 2023. The schedule 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, 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

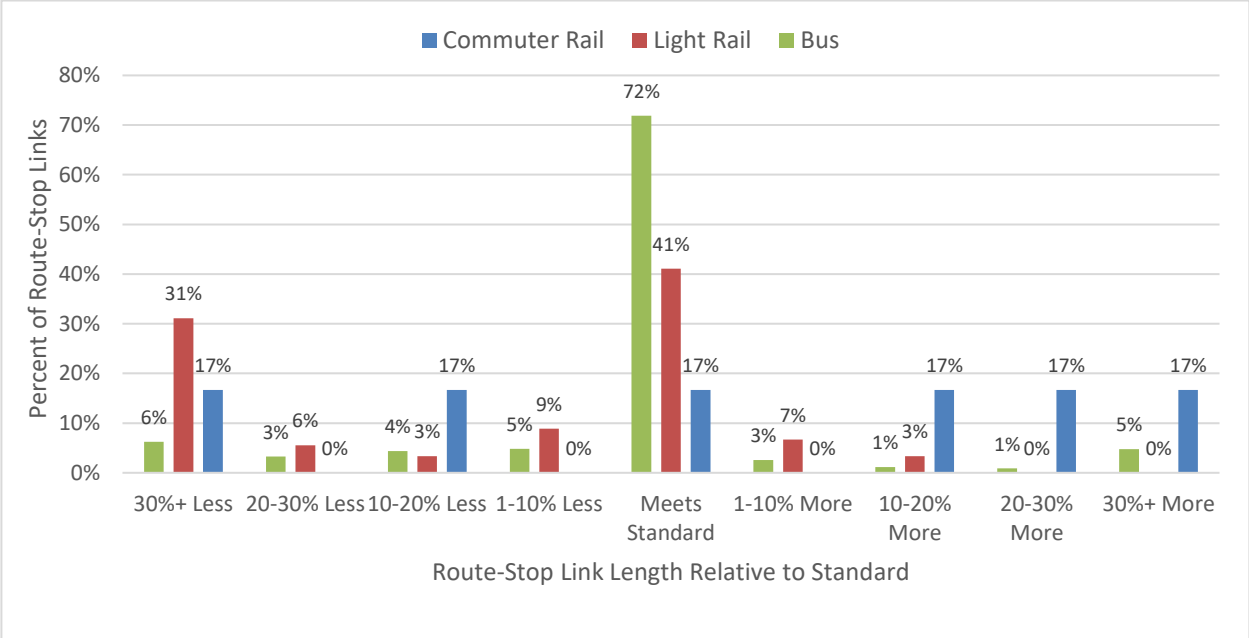
Stop spacing compliance is highest among bus routes, with 72 percent of route-stop links falling within their respective standard. The remaining 28 percent of bus links vary in length, but tend to fall below the standard (i.e. stop distances are more closely spaced) rather than above the standard (i.e. stop distances are more distantly spaced).

Only 41 percent of light rail route-stop links fall within the stop spacing standard, with 31 percent falling 30 percent or more below the recommended stop spacing minimum. These shorter links are most associated with segments in downtown Minneapolis and downtown Saint Paul, where shorter stop distances are appropriate to serve the higher density of land use and transit activity. The remaining 28 percent of light-rail route-stop links are distributed both above and below the stop spacing standard.

Commuter rail route-stop links vary considerably in their length relative to the stop spacing standard, with only 17 percent meeting the recommended distance. About 50 percent of commuter rail route stop links are longer than the stop spacing standard, with stop placement along the sole commuter rail line following a more *ad hoc* placement based on land use and traffic considerations than a generalized standard.

Figure 5 shows the distribution of route-stop links by their length relative to the stop spacing standards, separated by mode. A route-stop link is defined as the distance along a route between two of its stops in a single direction.

Figure 5. Systemwide Route-Stop Link Lengths Relative to Stop Spacing Standards



A summary of stop spacing compliance rates by BIPOC and low-income route designation is shown in Table 14. Since route designations do not differ among light rail routes, and since there is only one operating commuter rail line, no comparison index is calculated for these modes.

Both BIPOC and low-income bus routes see slightly lower stop spacing compliance rates than do non-BIPOC and non-low-income bus routes, with comparison indices both at 0.94. As this exceeds the threshold of 0.9, **this analysis identifies neither disparate impacts nor disproportionate burden associated with stop spacing.**

Table 14. Stop Spacing Standard Results: Route-Stop Links Meeting Standards

Mode	Designation	*Less than Standard*	Compliant with Standard	*More than Standard*
Bus	BIPOC Routes	*19%*	71%	*10%*
	Non-BIPOC Routes	*17%*	76%	*7%*
	DI Comparison Index		**0.94**	
	Low-Income Routes	*18%*	72%	*10%*
	Non-Low-Income Routes	*22%*	77%	*1%*
	DB Comparison Index		**0.94**	
Commuter Rail	BIPOC Routes	*33%*	17%	*50%*
	Non-Low-Income Routes	*33%*	17%	*50%*
Light Rail	BIPOC Routes	*49%*	41%	*10%*
	Low-Income Routes	*49%*	41%	*10%*

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.

Metro Transit uses guidelines[30] to prioritize the locations where investments are made and the types of facilities it can install and maintain across the system. It 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 15, 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 15. Customer Amenities at Transit Stops Policies

Amenity	Stop Type		
	METRO (LRT, BRT) & Commuter Rail Stations*	**Transit Centers**	**Bus Stops**
Route Description/Map	Standard feature	Standard feature	Standard feature at bus stops with 10+ daily boardings
Detailed Timetable**	Standard feature	Standard feature	Standard feature in all Metro Transit-owned shelters
Real-Time Arrival Sign	Standard feature	Optional feature	Optional feature
Seating	Standard feature	Standard feature	Standard feature in all Metro Transit-owned shelters (benches may also be provided by others)
Shelter	Standard feature	Standard feature	Optional feature, prioritized for bus stops with 30+ daily boardings
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.

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

[30] The guidelines described here reflect those in place during the analysis period of fall 2023. In 2024, Metro Transit updated its amenity guidelines to reduce the boarding thresholds for shelter placement, shelter replacement/removal, and heating. These guidelines will apply to future analyses.

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.

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 primarily 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. During the analysis period of fall 2023, Metro Transit used 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 were considered for replacement; shelters at stops with fewer than 15 daily boardings were 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 8,409 stops served by Metro Transit routes in fall 2023. 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 15), analyses are completed separately for stops at light rail, BRT, and commuter rail stations (these stops are otherwise known as platforms; n=252); stops at one of 24 transit centers (n=51 stops); and all other bus stops (n=8,106 stops).[31] Table 16 summarizes the stops considered in this analysis by stop type and by BIPOC and low-income designation.

[31] Stops that are light rail or BRT station platforms that are within a transit center (e.g., 46th Street Station, Mall of America, etc.) are subject to the more stringent amenities policies for stations, rather than the less stringent policies for stops at transit centers.

Table 16. 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	139	113	167	85	252
	55%	45%	67%	33%	100%
Transit Centers	31	20	36	15	51
	61%	39%	71%	29%	100%
Bus Stops	3,905	4,201	4,298	3,808	8,106
	48%	52%	53%	47%	100%
Total	4,075	4,334	4,501	3,908	8,409
	48%	52%	54%	46%	100%

For each amenity type, at each of the stop types, amenity placement rates are calculated and compared between BIPOC stops and non-BIPOC stops, and between low-income stops and non-low-income stops. For example:

- 12.9 percent of all low-income bus stops have shelters, compared to 4.9 percent of all non-low-income bus stops (Table 17);
- 87.1 percent of all BIPOC stops at Transit Centers have a real-time arrival sign, compared to 75.0 percent of all non-BIPOC stops at Transit Centers (Table 18);
- 100 percent of low-income stops at stations have a detailed timetable, equal the rate for non-low-income stops at stations (Table 19).

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 a daily boarding threshold for consideration – such as 100+ boardings a day for shelter heating – analysis is conducted for warranted stops, unwarranted stops, and overall (regardless of the warrant).

Additionally, the following assumptions and methods are used in the analysis:

- Amenity warrants based on ridership (e.g., shelter) use average weekday daily boarding data from 2023, collected from APCs and summarized to the stop level.
- The warrant applied to calculate unwarranted shelter placement is the 15-boarding standard for shelter replacement or removal, not the 30-boarding standard for new shelter placement.
- 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.
- Metro Transit does not track certain amenities including trash receptacles (assumed to be included at transit stations and centers); detailed timetables at transit centers (assumed to be at all transit center stops); or real-time signs on METRO Red Line, METRO Orange Line, Northstar commuter rail, and LRT platforms (assumed as a standard feature).

- 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."[32] 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 17, Table 18, and Table 19 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. Comparison indices are generally above 1.00 for all transit centers, BRT and rail platforms, and above 0.90 for all warranted stop amenities. Therefore, **no disparate impacts or disproportionate burdens are identified for amenities warranted by Metro Transit service standards**.

The results are discussed in more detail below.

Bus Stops

Placement rates for different amenity types at bus stops and their comparison indices are shown in Table 17. Results show that when warranted by ridership, Metro Transit provides amenities at higher rates for BIPOC and low-income bus stops than non-BIPOC and non-low-income bus stops, respectively. As indicated in Table 17, when warranted by ridership:

- Shelters are placed at BIPOC bus stops at a rate nine percent greater than non-BIPOC stops (55.0 percent versus 50.5 percent).
- Shelters are placed at low-income bus stops at a rate 16 percent greater than non-low-income stops (55.2 percent versus 47.4 percent).
- Heaters within shelters are placed at BIPOC bus stops at a rate seven percent greater than at non-BIPOC stops (34.9 percent versus 32.7 percent).
- Heaters within shelters are placed at low-income bus stops at a rate nine percent greater than at non-low-income stops (34.5 percent versus 31.6 percent).

Metro Transit considers adding lighting to shelters at bus stops with high boardings during dark hours. As indicated in Table 17:

- Lighting within shelters is placed at BIPOC bus stops at a rate 14 percent greater than non-BIPOC stops (47.3 percent versus 41.6 percent).
- Lighting within shelters is placed at low-income bus stops at a rate 38 percent greater than non -low-income stops (48.4 percent versus 35.1 percent).

While most amenities at regular bus stops are placed at BIPOC and low-income stops at a greater or equal rate compared to non-BIPOC and non-low-income stops, one potential disparate impact and one potential disproportionate burden are identified for *unwarranted* heat in bus stop shelters.

- Unwarranted heating within shelters is placed at BIPOC stops at a rate 15 percent lower than at non-BIPOC stops (13.3 percent versus 15.5 percent).

[32] FTA, *Circular 4702.1B*, page IV-6

- Unwarranted heating within shelters is placed at low-income stops at a rate 12 percent lower than at non-low-income stops (13.6 percent versus 15.6 percent).

Many such shelter heaters were warranted in the previous service monitoring study, which identified no disparate impacts or disproportionate burdens, but have since been redesignated as unwarranted due to ridership losses associated with the COVID-19 pandemic. As of 2023, ridership regionwide has continued to return, thus rather than remove existing shelter heaters where they are now unwarranted but may return to warranted status, Metro Transit has opted to maintain these amenities.

Given the potential for disparate impact and disproportionate burden as ridership recovers unevenly, Metro Transit should continue to monitor ridership rebound at stops with currently unwarranted heaters. Should ridership at these locations stop returning, Metro Transit can relocate or remove heaters accordingly. Metro Transit's 2024 update to its bus amenity placement guidelines will likely also mitigate potential for disparities in unwarranted heaters, as it lowered the warrants for heating in shelters from 100 to 70.[33]

Data quality is another factor to consider. Many of the bus shelters with unwarranted heaters are at stops where the bus boardings data are incomplete. For example, the shelters with heaters on Marquette and 2nd Avenues serve riders waiting for other transit service providers and those boardings are not included in Metro Transit's ridership data.

Table 17. 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
Shelter (n=735)	11.5%	7.0%	**1.64**	12.9%	4.9%	**2.63**
Warranted (n=612)	55.0%	50.5%	**1.09**	55.2%	47.4%	**1.16**
Unwarranted (n=123)	2.0%	1.7%	**1.18**	2.2%	1.4%	**1.54**
Heat within Shelter (n=132)	17.3%	18.8%	**0.92**	18.1%	17.2%	**1.05**
Warranted (n=47)	34.9%	32.7%	**1.07**	34.5%	31.6%	**1.09**
Unwarranted (n=85)	13.3%	15.5%	**0.85**	13.6%	15.6%	**0.88**
Light within Shelter (n=331)	47.3%	41.6%	**1.14**	48.4%	35.1%	**1.38**
Route Description/Map (n=626)	9.7%	6.0%	**1.61**	10.3%	4.9%	**2.09**
Warranted (n=536)	34.9%	32.4%	**1.08**	33.9%	33.8%	**1.00**
Unwarranted (n=90)	1.8%	1.1%	**1.63**	1.7%	1.1%	**1.60**
Detailed Timetable within Shelter (n=682)	92.6%	93.1%	**0.99**	92.7%	93.0%	**1.00**
Real-Time Arrival Sign (n=129)	1.7%	1.5%	**1.09**	2.2%	0.9%	**2.37**

[33] Metro Transit. *Bus Stop Improvement Guidelines*. August 2024. https://www.metrotransit.org/Data/Sites/1/media/about/improvements/better-bus-shelters/placementguidlines_2024.pdf

Transit Centers

The amenities placement results for stops at transit centers are generally favorable. 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 18. 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 or disproportionate burden based on the distribution of amenities at transit center stops.**

Table 18. 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
Shelter (n=51)	100.0%	100.0%	**1.00**	100.0%	100.0%	**1.00**
Heat within Shelter (n=45)	93.5%	84.2%	**1.11**	94.4%	78.6%	**1.20**
Light within Shelter (n=45)	93.5%	84.2%	**1.11**	94.4%	78.6%	**1.20**
Seating (n=51)	100.0%	100.0%	**1.00**	100.0%	100.0%	**1.00**
Trash Receptacle (n=51)	100.0%	100.0%	**1.00**	100.0%	100.0%	**1.00**
Detailed Timetable (n=51)	100.0%	100.0%	**1.00**	100.0%	100.0%	**1.00**
Real-Time Arrival Sign (n=42)	87.1%	75.0%	**1.16**	88.9%	66.7%	**1.33**
Route Description/Map (n=51)	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 15). Therefore, all amenities have placement rates of 100 percent (Table 19). For all amenity types:

- amenity placement rates at BIPOC stops at stations are equal to those at non-BIPOC stops at stations, and;
- amenity placement rates at low-income bus stops at stations are equal to those at non-low-income stops at stations.

Therefore, this analysis identifies no disparate impact or disproportionate burden based on the distribution of amenities at light rail, BRT, and commuter rail stations.

Table 19. 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
Shelter (n=233)	100.0%	100.0%	**1.00**	100.0%	100.0%	**1.00**
Heat within Shelter (n=233)	100.0%	100.0%	**1.00**	100.0%	100.0%	**1.00**
Light within Shelter (n=233)	100.0%	100.0%	**1.00**	100.0%	100.0%	**1.00**
Seating (n=233)	100.0%	100.0%	**1.00**	100.0%	100.0%	**1.00**
Trash Receptacle (n=233)	100.0%	100.0%	**1.00**	100.0%	100.0%	**1.00**
Detailed Timetable (n=233)	100.0%	100.0%	**1.00**	100.0%	100.0%	**1.00**
Real-Time Arrival Sign (n=233)	100.0%	100.0%	**1.00**	100.0%	100.0%	**1.00**
Route Description/Map (n=233)	100.0%	100.0%	**1.00**	100.0%	100.0%	**1.00**

Two stations do not have a detailed timetable, shelter, lighting, heaters, nor real-time arrival signs: northbound Xerxes & 56th arterial BRT station in Brooklyn Center, served by the METRO C Line, and northbound Washington & 2nd Avenue, served by the METRO Orange Line. These stations are the last northbound stations before the end of each 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 BRT stations explicitly state that certain amenities are not expected in situations like this. Thus, these stations are excluded from analysis of detailed timetables, shelters, lighting, heaters, and real-time arrival signs.

Vehicle Assignment

Policies

The Metropolitan Council adopted *Fleet Management Procedures*[34] 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 operations and maintenance facilities and one commuter rail facility. 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. MTS routes are operated out of four garages.

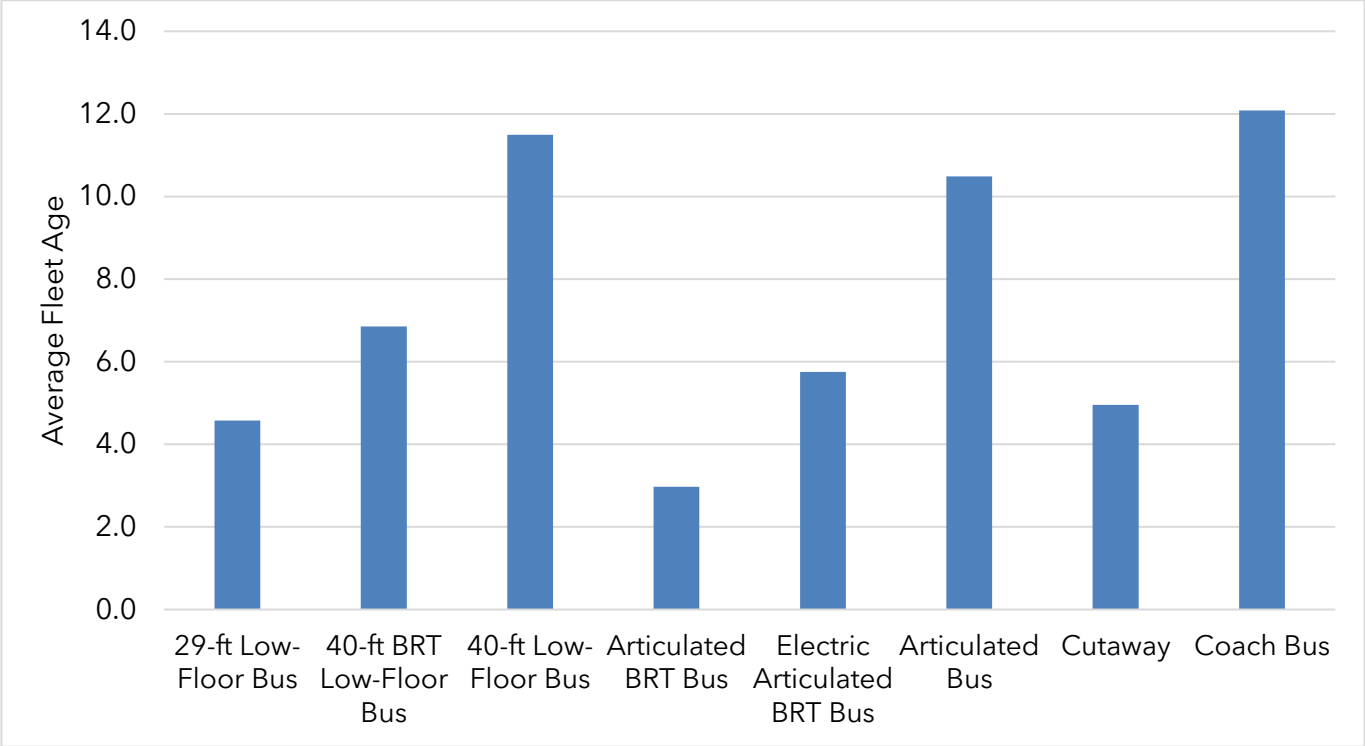
Vehicle Types

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

[34] Metropolitan Council, *Fleet Management Procedures*, April 2012. https://metrocouncil.org/Transportation/Services/Regional-Vehicle-Fleet-Policy/FleetPolicyFleetManagementProcedures-pdf.aspx

Metropolitan Council through MTS. Figure 6 shows the average age of each vehicle type in Metro Transit's fleet.

Figure 6. Average Age by Vehicle Type



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, and 25. Numerous other routes were also assigned hybrid buses during the data collection period for this study. Because of the expanded assignment of hybrid buses among routes, the hybrid bus type is not distinguished from other 40-foot low-floor buses in determining available fleet age.

Articulated Buses

Articulated buses are used on a variety of routes with heavy ridership including local and commuter and express. 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, such as 'cutaway' buses, 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, C, D, Orange and Red Lines. METRO A, C, D, and Orange Line buses have no on-board fare collection. BRT buses have fewer seats to allow for better passenger circulation.

Articulated BRT Buses

Currently, the METRO C, D, and Orange Lines use articulated BRT buses. These buses have no on-board fare collection. 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 on-board fare collection. 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.

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 as long as it is the correct size and type of bus. As a matter of practice, private providers prefer to assign the same vehicle to the same operator on a regular basis to track vehicle maintenance and condition concerns.

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 by route designation; and
- difference between the average age of vehicles assigned to a route designation and the average age of the vehicle fleet eligible for that designation, where the vehicle fleet represents

the universe of available vehicles that could have been assigned to a specific route designation (e.g. electric articulated BRT buses can only be assigned to METRO C Line, a BIPOC route).

Average age of vehicles assigned by route designation is calculated by averaging the age of vehicles that operated all trips completed for each route then averaging again by route designation.

To generate a report of the average age of vehicles assigned and available (fleet age) by route designation, it is first necessary to determine what vehicle type was assigned to each route trips during the fall of 2023. This information is generated primarily using automatic vehicle location (AVL) data. If AVL data are not available for a route trips, secondary sources are used, including farebox data and dispatcher-recorded assignments.

The evaluation does not include LRT or commuter rail modes given their limited fleets, constraints on vehicle assignment, and route designations. Both of the LRT lines are designated as BIPOC and low-income routes, and Northstar commuter rail is designated as BIPOC and non-low-income.

Results

Table 20 summarizes average vehicle age assigned, the average age of the fleet available, and the average difference between the two, by route designation for trips operated in fall 2023. A route-by-route summary of vehicle assignment results is provided in Appendix I: Vehicle Assignment

Among bus routes, BIPOC routes were assigned older vehicles than non-BIPOC routes, at 7.70 years and 7.00 years, on average, respectively (Table 20). This difference results in a comparison index of 0.91, above the threshold for disparate impact.

BIPOC trips were assigned vehicles newer than the available fleet average compared to non-BIPOC routes (2.24 years newer versus 1.56 years newer). The comparison index for this measure is 1.44, above the 0.90 threshold for disparate impact. **Therefore, this analysis identifies no disparate impacts based on vehicle assignment.**

Table 20. Vehicle Assignment Policy Results, Measured by Average Vehicle Age (Years)

Mode	Route Designation	Assigned	Available	Difference
Bus	BIPOC Route Trips	7.70	9.95	-2.24
	Non-BIPOC Route Trips	7.00	8.56	-1.56
	DI Comparison Index	**0.91**	**--**	**1.44**
	Low-Income Route Trips	7.52	9.52	-1.99
	Non-Low-Income Route Trips	7.64	10.26	-2.62
	DB Comparison Index	**1.02**	**--**	**0.76***

*Not considered a disproportionate burden as vehicle age assigned is favorable to low-income riders and mitigation would yield diminishing returns

Low-income route trips were assigned newer vehicles than those assigned to non-low-income trips, on average (7.52 years versus 7.64 years).

The average non-low-income route was assigned a vehicle that was 2.62 years newer than the average age of the available vehicles that could have operated the route. Conversely, low-income route trips were, on average, assigned vehicles 1.99 years newer than the average age of the available

vehicles that could have operated the trip. Shown in Table 20, the ratio of average vehicle age assigned relative to available fleet was 0.76, below the threshold of 0.90 and indicating more advantageous results for non-low-income routes. However, because Metro Transit is already assigning newer vehicles to low-income routes than to non-low-income routes there are diminishing returns to mitigation. **Therefore, this analysis identifies no disproportionate burden based on vehicle assignment.**

Summary of Results

Table 21 lists the disparate impact and disproportionate burden comparison indices results of all analyses of Metro Transit's Title VI standards and policies in fall 2023.

Most comparison indices in Table 21 are above the 0.90 minimum threshold for avoiding disparate impact and disproportionate burden, indicating equal or better results for BIPOC and low-income residents and riders compared to non-BIPOC and non-low-income residents and riders, respectively. Several comparison indices are below the 0.90 threshold, however these only occur for unwarranted amenities and for relative age of vehicles compared to available fleet, neither of which are considered to necessitate mitigation. **Therefore, this analysis identifies no disparate impact and disproportionate burden based on Metro Transit's Title VI standards and policies.**

Table 21. Summary of Analysis Results

Standard/Policy	Measure	DI Comp. Index	DB Comp. Index
Vehicle Load	Trips Overloaded	1.00	1.00
	Trips Consistently Overloaded	1.00	1.00
Vehicle Headway	Peak	1.00	4.88
	Off-Peak	0.98	0.93
	Weekend	1.52	121.71
	Total	1.11	2.50
On-Time Performance	Timepoint Obs. On Time	0.96	0.95
Route Spacing	Combined Market Area I	1.01	1.01
	Combined Market Area II	1.03	1.01
Midday Service	Market Area I	1.15	1.18
	Market Area II	1.17	1.15
	Market Area III	1.40	1.60
Stop Spacing	Route-Stop Links Meeting Standards	0.94	0.94
Distribution of Amenities At Bus Stops	Route Description/Map	1.61	2.09
	Warranted	1.08	1.00
	Unwarranted	1.63	1.60
	Detailed Timetable	0.99	1.00
	Real-Time Arrival Sign	1.09	2.37
	Shelter	1.64	2.63

Standard/Policy	Measure	DI Comp. Index	DB Comp. Index
	Warranted	1.09	1.16
	Unwarranted	1.18	1.54
	Lighting within Shelter	1.14	1.38
	Heaters within Shelter	0.92	1.05
	Warranted	1.07	1.09
	Unwarranted	**0.85***	**0.88***
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	1.33
	Seating	1.00	1.00
	Shelter	1.00	1.00
	Lighting within Shelter	1.11	1.20
	Heaters within Shelter	1.11	1.20
	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	0.91	1.02
	Age of Vehicles Assigned Relative to Available	1.44	**0.76****

*Not considered a disparate impact or disproportionate burden requiring mitigation.

**Not considered a disproportionate burden as vehicle age assigned is favorable to low-income riders and mitigation would yield diminishing returns.

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 2021.

In almost all compliance measures, BIPOC and low-income populations show equivalent, or better, outcomes compared to non-BIPOC and non-low-income populations. The sole exception is for unwarranted heating in shelters, which is a result of stop redesignation following the COVID-19 pandemic and is not considered to require mitigation. Therefore, **this analysis identifies no potential for disparate impact on BIPOC populations or potential for disproportionate burden on low-income populations based on Metro Transit's Title VI standards and policies (Table 22).**

Table 22. 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		
Route Spacing	No	No
Midday Service	No	No
Stop Spacing	No	No
Distribution of Amenities		
At Bus Stops	No*	No*
At Transit Centers	No	No
At Stations	No	No
Vehicle Assignment	No	No

*No disparate impacts or disproportionate burdens identified for amenities warranted by Metro Transit service standards.

Continuing Work

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.

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 that 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 23. Service Monitoring Routes by Type and Designations

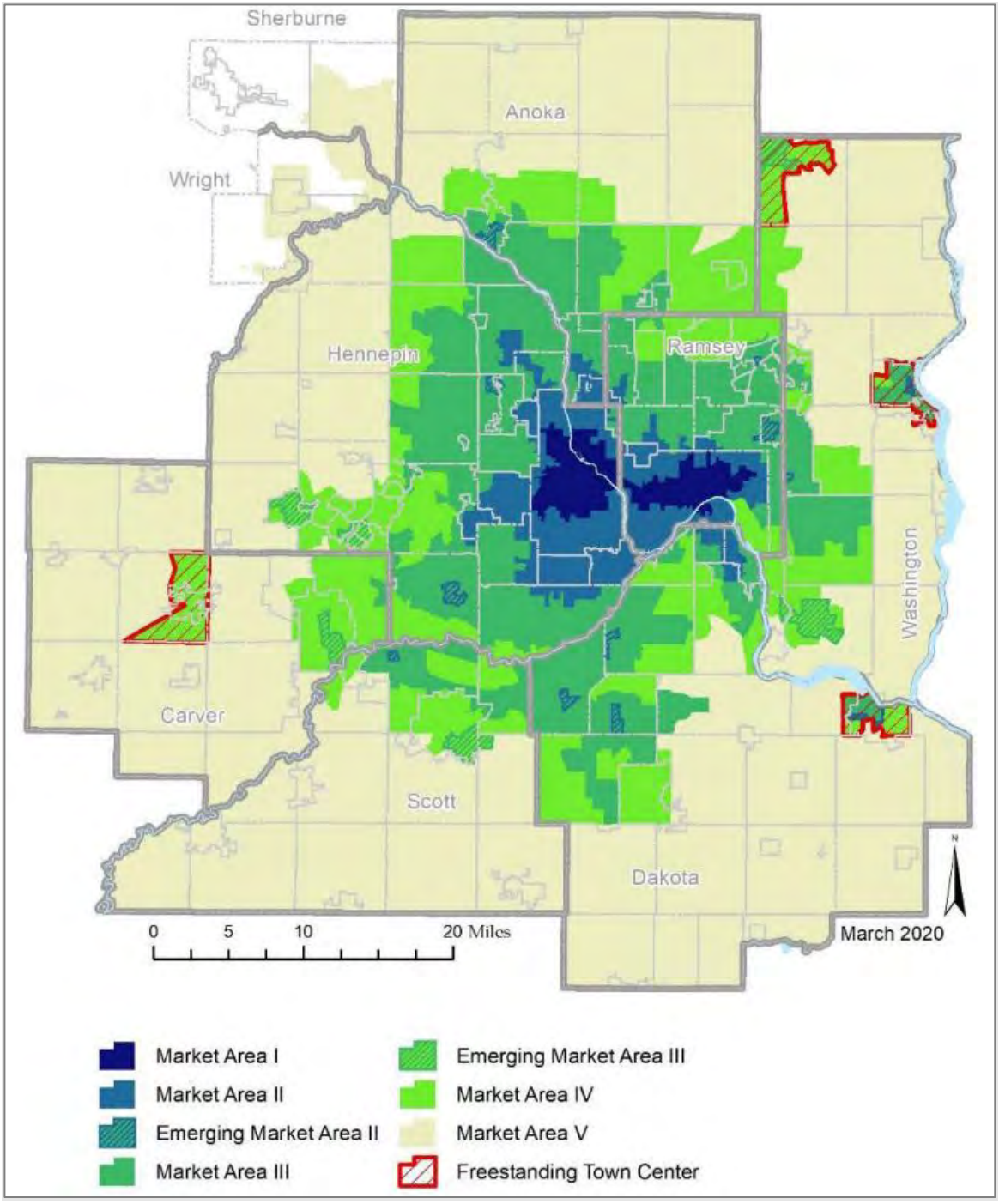
Route	Route Type	Race/Ethnicity Designation	Income Designation
2	Core Local	BIPOC	Low-Income
3	Core Local	BIPOC	Low-Income
4	Core Local	BIPOC	Low-Income
5	Supporting Local	BIPOC	Low-Income
6	Core Local	Non-BIPOC	Low-Income
7	Core Local	BIPOC	Low-Income
9	Core Local	BIPOC	Low-Income
10	Core Local	BIPOC	Low-Income
11	Core Local	BIPOC	Low-Income
14	Core Local	BIPOC	Low-Income
17	Core Local	BIPOC	Low-Income
18	Core Local	BIPOC	Low-Income
21	Core Local	BIPOC	Low-Income
22	Core Local	BIPOC	Low-Income
23	Supporting Local	Non-BIPOC	Low-Income
25	Core Local	BIPOC	Low-Income
30	Supporting Local	BIPOC	Low-Income
32	Supporting Local	BIPOC	Low-Income
33	Supporting Local	BIPOC	Low-Income
46	Supporting Local	Non-BIPOC	Low-Income
54	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

Route	Route Type	Race/Ethnicity Designation	Income Designation
87	Supporting Local	BIPOC	Low-Income
94	Commuter and Express	BIPOC	Low-Income
113	Commuter and Express	BIPOC	Non-Low-Income
114	Commuter and Express	Non-BIPOC	Non-Low-Income
219	Suburban Local	BIPOC	Low-Income
225	Suburban Local	Non-BIPOC	Low-Income
227	Suburban Local	Non-BIPOC	Low-Income
250	Commuter and Express	BIPOC	Non-Low-Income
252	Commuter and Express	BIPOC	Low-Income
264	Commuter and Express	BIPOC	Low-Income
270	Commuter and Express	BIPOC	Non-Low-Income
275	Commuter and Express	BIPOC	Non-Low-Income
294	Commuter and Express	Non-BIPOC	Low-Income
323	Suburban Local	BIPOC	Low-Income
353	Commuter and Express	BIPOC	Low-Income
355	Commuter and Express	Non-BIPOC	Low-Income
363	Commuter and Express	BIPOC	Non-Low-Income
467	Commuter and Express	BIPOC	Low-Income
501	Suburban Local	Non-BIPOC	Low-Income
515	Suburban Local	BIPOC	Low-Income
534	Suburban Local	BIPOC	Low-Income
537	Suburban Local	Non-BIPOC	Low-Income
538	Suburban Local	Non-BIPOC	Low-Income
539	Suburban Local	BIPOC	Low-Income
540	Suburban Local	Non-BIPOC	Low-Income
542	Suburban Local	Non-BIPOC	Low-Income
546	Suburban Local	Non-BIPOC	Non-Low-Income
578	Commuter and Express	BIPOC	Low-Income
612	Suburban Local	Non-BIPOC	Low-Income
615	Suburban Local	BIPOC	Low-Income
645	Suburban Local	Non-BIPOC	Low-Income
667	Commuter and Express	BIPOC	Non-Low-Income
673	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

Route	Route Type	Race/Ethnicity Designation	Income Designation
724	Suburban Local	BIPOC	Low-Income
755	Commuter and Express	BIPOC	Low-Income
760	Commuter and Express	BIPOC	Low-Income
761	Commuter and Express	BIPOC	Low-Income
763	Commuter and Express	BIPOC	Low-Income
764	Commuter and Express	BIPOC	Low-Income
766	Commuter and Express	Non-BIPOC	Non-Low-Income
768	Commuter and Express	BIPOC	Non-Low-Income
801	Suburban Local	BIPOC	Low-Income
804	Suburban Local	BIPOC	Low-Income
805	Suburban Local	Non-BIPOC	Non-Low-Income
824	Commuter and Express	BIPOC	Non-Low-Income
850	Commuter and Express	BIPOC	Non-Low-Income
852	Commuter and Express	BIPOC	Low-Income
Northstar (888)	Commuter Rail	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	Low-Income
METRO Orange Line (904)	Highway BRT	BIPOC	Low-Income
METRO A Line (921)	Arterial BRT	Non-BIPOC	Low-Income
METRO C Line (923)	Arterial BRT	BIPOC	Low-Income
METRO D Line (924)	Arterial BRT	BIPOC	Low-Income

APPENDIX C: TRANSIT MARKET AREAS

Figure 7. Transit Market Areas in the Region



APPENDIX D: ROUTE DESIGNATION METHODOLOGY

In order to define routes as BIPOC and low-income, route patterns and stops in service during fall 2023 were used, as well as demographic data from the 2018-2022 5-Year American Community Survey (ACS) at the block group level. Each route pattern was buffered by 100 feet to account for instances in which routes run on the border of two census block groups, so that the demographics of both block groups are accounted for in determining route demographics. These route pattern buffers were then clipped to only represent the lengths of the routes within a quarter-mile of their respective stops. Long non-stop segments were thus omitted from the buffer and any analysis performed on it. This allows for a more accurate representation of limited-stop and express services, which pass through many block groups without necessarily serving them. The total acreage of each resulting route pattern buffer was then calculated for use in comparing demographics.

Two demographic layers were created according to service area averages: a layer of BIPOC block groups in which the percent BIPOC population was greater than the service area average of 33.5 percent, and a layer of low-income block groups in which the percentage of persons making 185 percent or less of the federal poverty threshold was greater than the service area average of 20.5 percent. For each route pattern buffer, the total acreage of the buffer overlapping BIPOC and low-income blocks was calculated. By comparing these areas to the route pattern buffer's total acreage, one can calculate the percentage of each route's service area that is BIPOC or low-income. A weighted average of each route's BIPOC and low-income area was calculated, weighted by the number of weekly trips on each route pattern. A route was then designated BIPOC if, on average, at least one-third of its area overlapped BIPOC block groups, and so on for low-income designation.

This process resulted in some route designations differing from those of the previous service monitoring exercise, according to the census-based methodology.

One limitation of the census-based methodology is its usage of a particular service date in which a route may be experiencing rare detours or service changes that do not reflect its regular service throughout the year. This analysis considers service for the month of October 2023, during which time certain service modifications were present that may affect some routes' BIPOC and low-income designations.

In order to reduce the impact of these limitations on the designation of transit routes, ridership data from the 2022 Onboard Survey is used to supplement the spatial demographics used in route designation. Specifically, route designations were modified where the ridership demographics of a given route in the Onboard Survey differed considerably from the average demographics of the area it serves. For example, Route 6 is designated as a non-BIPOC and non-low-income route according to the census methodology, but Onboard Survey data shows that both BIPOC and low-income riders considerably exceed their respective service area averages of 33.5 percent and 20.5 percent. Likewise, all routes for which BIPOC ridership in the Onboard Survey is above the service area average are designated as BIPOC routes, and all routes for which low-income ridership is above the service area average are designated as low-income routes.

Table 24. 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%)
4	Core Local	32.4%	44.7%
6	Core Local	18.0%	40.1%
23	Supporting Local	29.4%	45.3%
25	Core Local	28.4%	47.9%
33	Supporting Local	22.9%	43.9%
46	Supporting Local	15.5%	41.6%
83	Supporting Local	30.3%	48.2%
87	Supporting Local	23.2%	53.5%
225	Suburban Local	10.9%	46.5%
227	Suburban Local	21.1%	52.8%
250	Commuter and Express	42.0%	11.0%
252	Commuter and Express	23.6%	50.0%
264	Commuter and Express	18.0%	46.0%
270	Commuter and Express	40.5%	21.7%
275	Commuter and Express	50.3%	4.3%
294	Commuter and Express	17.0%	50.8%
363	Commuter and Express	54.0%	11.6%
537	Suburban Local	0.0%	44.3%
540	Suburban Local	15.7%	58.9%
542	Suburban Local	30.2%	56.1%
612	Suburban Local	22.1%	34.6%
645	Suburban Local	26.3%	41.5%
717	Suburban Local	12.9%	70.6%
766	Commuter and Express	32.7%	25.4%
768	Commuter and Express	54.2%	32.0%

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%)
824	Commuter and Express	81.0%	32.3%
852	Commuter and Express	64.2%	43.2%
901	Light Rail	26.3%	56.7%
903	Highway BRT	32.1%	64.6%
921	Arterial BRT	29.3%	53.3%

Table 25. 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%)
6	Core Local	40.1%	18.0%
23	Supporting Local	45.3%	29.4%
46	Supporting Local	41.6%	15.5%
114	Commuter and Express	21.3%	23%
225	Suburban Local	46.5%	10.9%
227	Suburban Local	52.8%	21.1%
250	Commuter and Express	11.0%	42.0%
252	Commuter and Express	50.0%	23.6%
270	Commuter and Express	21.7%	40.5%
353	Commuter and Express	40.4%	71%
363	Commuter and Express	11.6%	54.0%
537	Suburban Local	44.3%	15.7%
538	Suburban Local	42.2%	46%
540	Suburban Local	58.9%	30.2%
542	Suburban Local	56.1%	22.1%
546	Suburban Local	32.7%	30%
578	Commuter and Express	74.3%	42%
612	Suburban Local	34.6%	26.3%

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%)
645	Suburban Local	41.5%	12.9%
667	Commuter and Express	27.4%	29%
755	Commuter and Express	56.0%	43%
763	Commuter and Express	79.4%	92%
764	Commuter and Express	81.8%	58%
766	Commuter and Express	25.4%	54.2%
768	Commuter and Express	32.0%	81.0%
805	Light Rail	23.2%	20%
850	Highway BRT	25.6%	26%
888	Commuter Rail	6.2%	12%
903	Highway BRT	64.6%	29.3%
921	Arterial BRT	53.3%	14.8%

APPENDIX E: VEHICLE LOAD

Table 26. Vehicle Overloads by Route

Route type abbreviations: CL = core local; Supp L = supporting local; Sub L = suburban local; C & E = commuter & express; ABRT = arterial BRT; 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	0.8%	1	0.6%
3	CL	B	LI	2.5%	2	1.1%
4	CL	B	LI	0.2%	0	0.0%
5	Supp L	B	LI	0.0%	0	0.0%
6	CL	NB	LI	0.1%	0	0.0%
7	CL	B	LI	0.0%	0	0.0%
9	CL	B	LI	0.0%	0	0.0%
10	CL	B	LI	0.6%	0	0.0%
11	CL	B	LI	0.0%	0	0.0%
14	CL	B	LI	0.0%	0	0.0%
17	CL	B	LI	0.0%	0	0.0%
18	CL	B	LI	0.5%	0	0.0%
21	CL	B	LI	1.0%	0	0.0%
22	CL	B	LI	0.2%	0	0.0%
23	Supp L	NB	LI	0.0%	0	0.0%
25	CL	B	LI	0.0%	0	0.0%
30	Supp L	B	LI	0.0%	0	0.0%
32	Supp L	B	LI	0.0%	0	0.0%
33	Supp L	B	LI	0.0%	0	0.0%
46	Supp L	NB	LI	0.0%	0	0.0%
54	CL	B	LI	0.5%	0	0.0%
61	CL	B	LI	0.1%	0	0.0%
62	CL	B	LI	0.0%	0	0.0%
63	CL	B	LI	0.2%	0	0.0%
64	CL	B	LI	0.1%	0	0.0%
65	Supp L	B	LI	0.0%	0	0.0%
67	CL	B	LI	0.0%	0	0.0%
68	CL	B	LI	0.0%	0	0.0%
70	CL	B	LI	0.0%	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
71	CL	B	LI	0.0%	0	0.0%
74	CL	B	LI	0.2%	0	0.0%
75	CL	B	LI	0.0%	0	0.0%
80	Supp L	B	LI	0.0%	0	0.0%
83	Supp L	B	LI	0.0%	0	0.0%
87	Supp L	B	LI	0.0%	0	0.0%
94	C & E	B	LI	0.1%	0	0.0%
113	C & E	B	NLI	0.8%	0	0.0%
114	C & E	NB	NLI	0.4%	0	0.0%
219	Sub L	B	LI	0.0%	0	0.0%
225	Sub L	NB	LI	0.0%	0	0.0%
227	Sub L	NB	LI	0.0%	0	0.0%
250	C & E	B	NLI	0.6%	0	0.0%
252	C & E	B	LI	0.0%	0	0.0%
264	C & E	B	LI	0.0%	0	0.0%
270	C & E	B	NLI	0.0%	0	0.0%
275	C & E	B	NLI	0.0%	0	0.0%
294	C & E	NB	LI	0.0%	0	0.0%
323	Sub L	B	LI	0.0%	0	0.0%
353	C & E	B	LI	0.6%	0	0.0%
355	C & E	NB	LI	0.0%	0	0.0%
363	C & E	B	NLI	0.0%	0	0.0%
467	C & E	B	LI	0.0%	0	0.0%
501	Sub L	NB	LI	0.0%	0	0.0%
515	Sub L	B	LI	0.0%	0	0.0%
534	Sub L	B	LI	0.0%	0	0.0%
537	Sub L	NB	LI	0.0%	0	0.0%
538	Sub L	NB	LI	0.0%	0	0.0%
539	Sub L	B	LI	0.0%	0	0.0%
540	Sub L	NB	LI	0.0%	0	0.0%
542	Sub L	NB	LI	0.0%	0	0.0%
546	Sub L	NB	NLI	0.0%	0	0.0%
578	C & E	B	LI	0.0%	0	0.0%
612	Sub L	NB	LI	0.0%	0	0.0%
615	Sub L	B	LI	0.0%	0	0.0%
645	Sub L	NB	LI	0.0%	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
667	C & E	B	NLI	0.0%	0	0.0%
673	C & E	NB	NLI	0.0%	0	0.0%
705	Sub L	B	LI	0.0%	0	0.0%
716	Sub L	B	LI	0.0%	0	0.0%
717	Sub L	B	LI	0.0%	0	0.0%
721	Sub L	B	LI	0.0%	0	0.0%
722	Sub L	B	LI	0.0%	0	0.0%
723	Sub L	B	LI	0.0%	0	0.0%
724	Sub L	B	LI	0.0%	0	0.0%
755	C & E	B	LI	0.0%	0	0.0%
760	C & E	B	LI	0.0%	0	0.0%
761	C & E	B	LI	0.0%	0	0.0%
763	C & E	B	LI	0.0%	0	0.0%
764	C & E	B	LI	0.0%	0	0.0%
766	C & E	NB	NLI	0.0%	0	0.0%
768	C & E	B	NLI	0.3%	0	0.0%
801	Sub L	B	LI	0.0%	0	0.0%
804	Sub L	B	LI	0.0%	0	0.0%
805	Sub L	NB	NLI	0.0%	0	0.0%
824	C & E	B	NLI	0.0%	0	0.0%
850	C & E	B	NLI	0.5%	0	0.0%
852	C & E	B	LI	0.0%	0	0.0%
903	BRT	NB	LI	0.0%	0	0.0%
904	BRT	B	LI	0.0%	0	0.0%
921	ABRT	NB	LI	0.7%	0	0.0%
923	ABRT	B	LI	0.0%	0	0.0%
924	ABRT	B	LI	0.3%	0	0.0%

APPENDIX F: ON-TIME PERFORMANCE

Table 27. On-Time Performance by Route

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; ABRT = arterial BRT; 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	80%	73%	74%	79%
3	CL	B	LI	72%	69%	67%	71%
4	CL	B	LI	74%	74%	74%	74%
5	Supp L	B	LI	76%	83%	80%	78%
6	CL	NB	LI	81%	82%	81%	81%
7	CL	B	LI	74%	76%	74%	74%
9	CL	B	LI	78%	76%	78%	78%
10	CL	B	LI	69%	65%	66%	68%
11	CL	B	LI	80%	81%	72%	80%
14	CL	B	LI	81%	67%	78%	79%
17	CL	B	LI	80%	76%	78%	79%
18	CL	B	LI	80%	74%	81%	80%
21	CL	B	LI	76%	71%	72%	75%
22	CL	B	LI	74%	60%	67%	71%
23	Supp L	NB	LI	83%	79%	81%	82%
25	CL	B	LI	69%	-	-	69%
32	Supp L	B	LI	87%	83%	85%	86%
46	Supp L	NB	LI	91%	-	-	91%
54	CL	B	LI	79%	76%	70%	78%
61	CL	B	LI	76%	71%	-	76%
62	CL	B	LI	89%	86%	88%	88%
63	CL	B	LI	69%	77%	73%	71%
64	CL	B	LI	82%	80%	74%	81%
68	CL	B	LI	82%	85%	86%	83%
71	CL	B	LI	87%	90%	95%	88%
74	CL	B	LI	83%	85%	90%	84%
83	Supp L	B	LI	71%	-	-	71%
94	C&E	B	LI	83%	-	-	83%
113	C&E	B	NLI	89%	-	-	89%
114	C&E	NB	NLI	87%	-	-	87%

Route	Route Type	Race/Ethnicity Designation	Income Designation	Weekday	Saturday	Sunday	Total
250	C&E	B	NLI	85%	-	-	85%
252	C&E	B	LI	86%	-	-	86%
264	C&E	B	LI	74%	-	-	74%
270	C&E	B	NLI	80%	-	-	80%
275	C&E	B	NLI	93%	-	-	93%
294	C&E	NB	LI	97%	-	-	97%
353	C&E	B	LI	70%	-	-	70%
355	C&E	NB	LI	86%	-	-	86%
363	C&E	B	NLI	71%	-	-	71%
501	Sub L	NB	LI	94%	-	-	94%
515	Sub L	B	LI	93%	92%	93%	93%
578	C&E	B	LI	80%	-	-	80%
612	Sub L	NB	LI	83%	82%	76%	82%
645	Sub L	NB	LI	85%	80%	80%	84%
667	C&E	B	NLI	77%	-	-	77%
673	C&E	NB	NLI	82%	-	-	82%
721	Sub L	B	LI	90%	86%	89%	90%
722	Sub L	B	LI	92%	94%	94%	92%
723	Sub L	B	LI	93%	88%	93%	92%
724	Sub L	B	LI	91%	96%	94%	92%
755	C&E	B	LI	71%	-	-	71%
760	C&E	B	LI	80%	-	-	80%
761	C&E	B	LI	97%	-	-	97%
763	C&E	B	LI	91%	-	-	91%
766	C&E	NB	NLI	80%	-	-	80%
768	C&E	B	NLI	89%	-	-	89%
850	C&E	B	NLI	83%	-	-	83%
888	CR	NB	NLI	70%	-	29%	70%
901	LRT	B	LI	-	-	-	84%
902	LRT	B	LI	-	-	-	66%
904	BRT	B	LI	88%	84%	85%	87%
921	ABRT	NB	LI	83%	82%	82%	82%
923	ABRT	B	LI	88%	85%	85%	87%
924	ABRT	B	LI	85%	84%	87%	85%

APPENDIX G: ROUTE SPACING

Route spacing results by Transit Market Areas and route type are shown in Figure 8 through Figure 11. Market Area II includes portions of both Stillwater and Hastings which are shown in inset form.

Figure 8. Market Area I – Local Route Spacing for BIPOC Block Groups

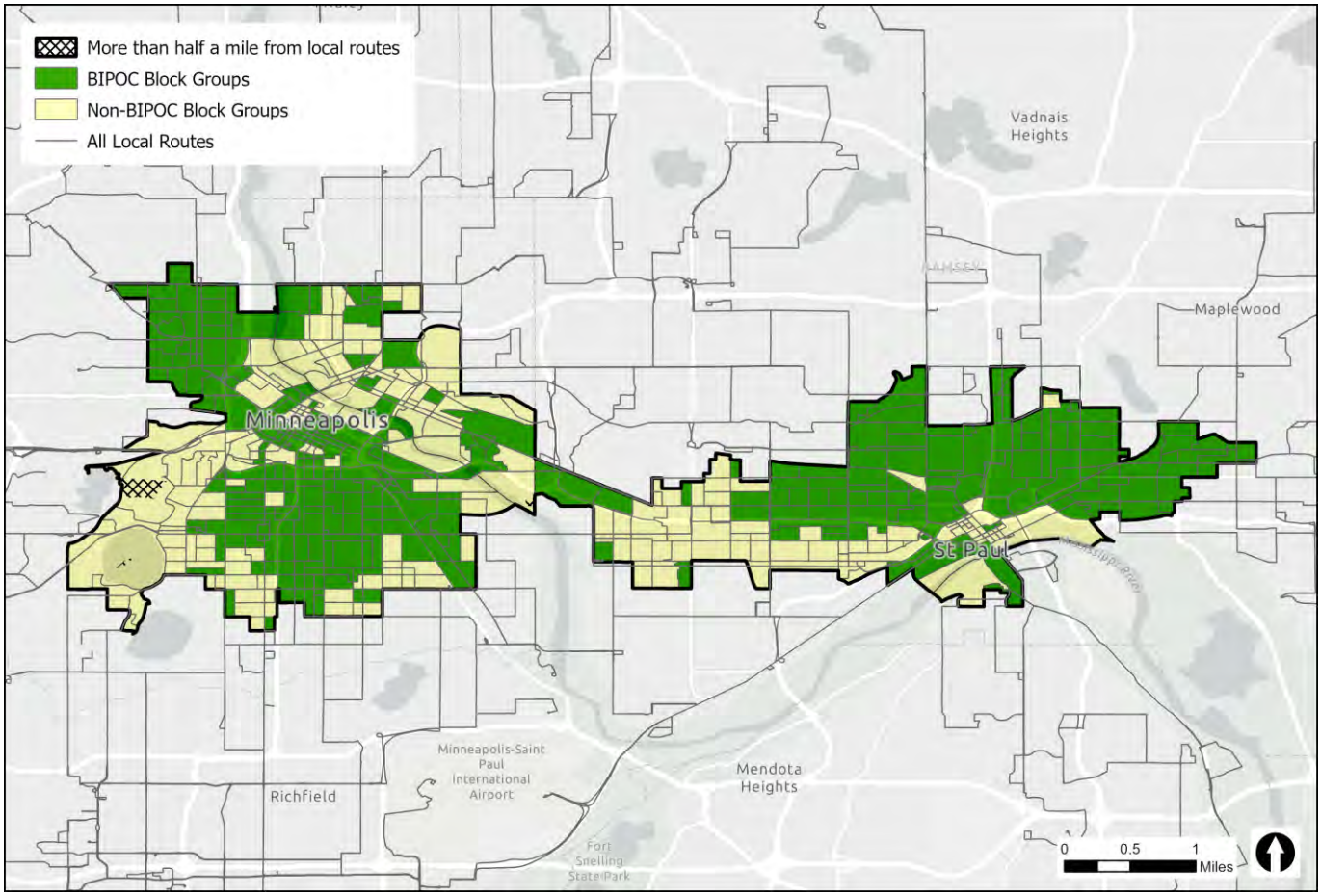


Figure 9. Market Area I – Local Route Spacing for Low-Income Block Groups

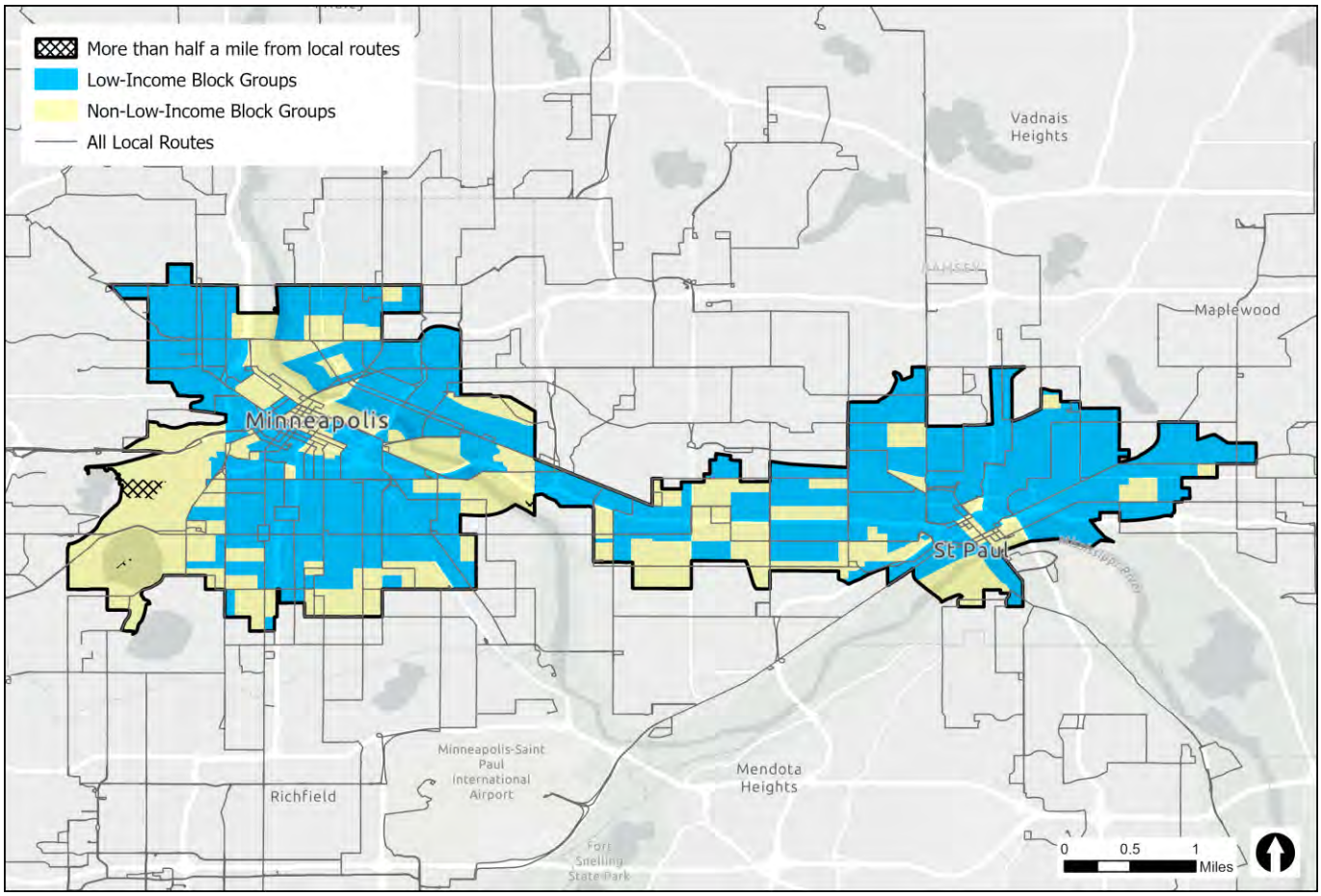


Figure 10. Market Area II – Local Route Spacing for BIPOC Block Groups

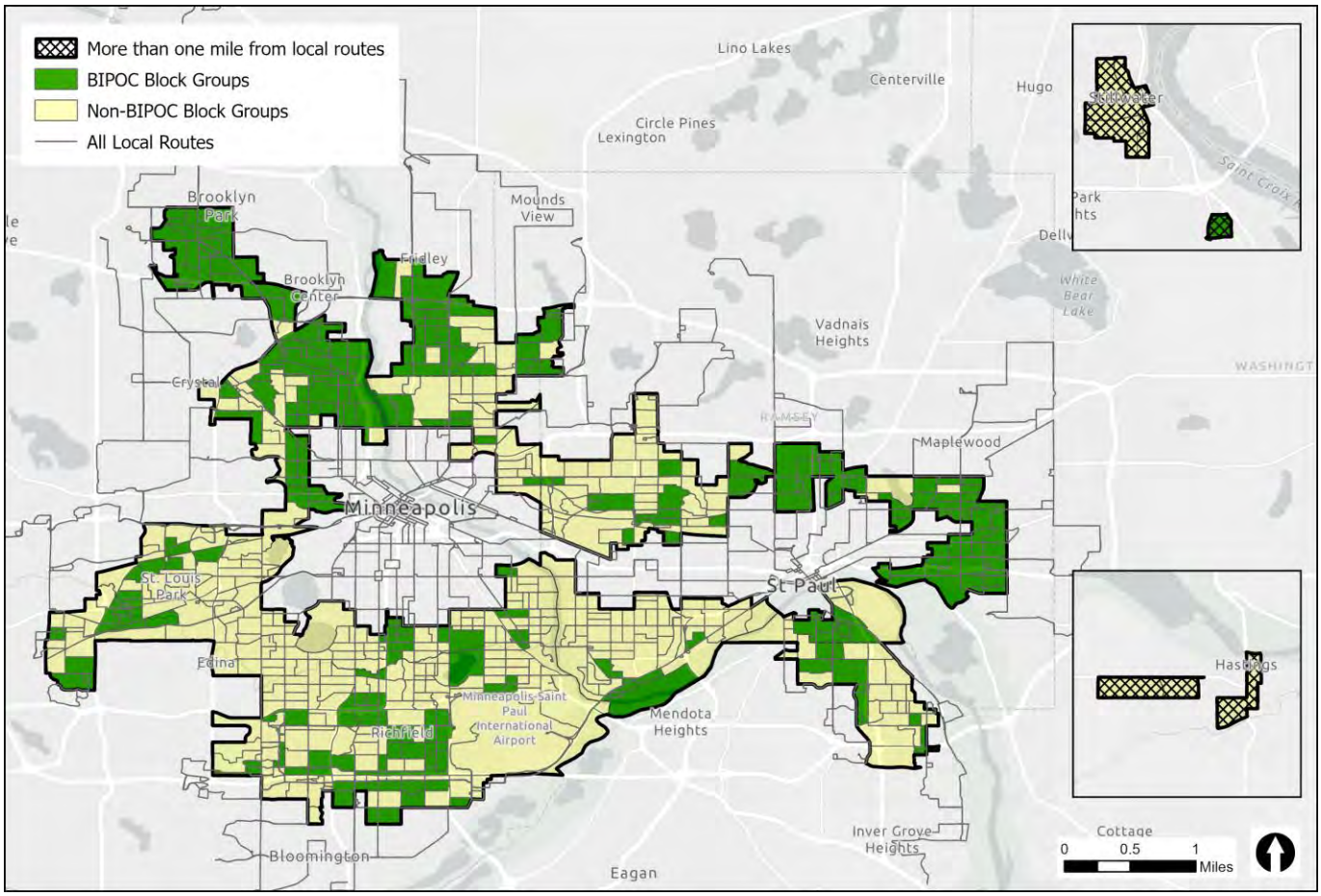
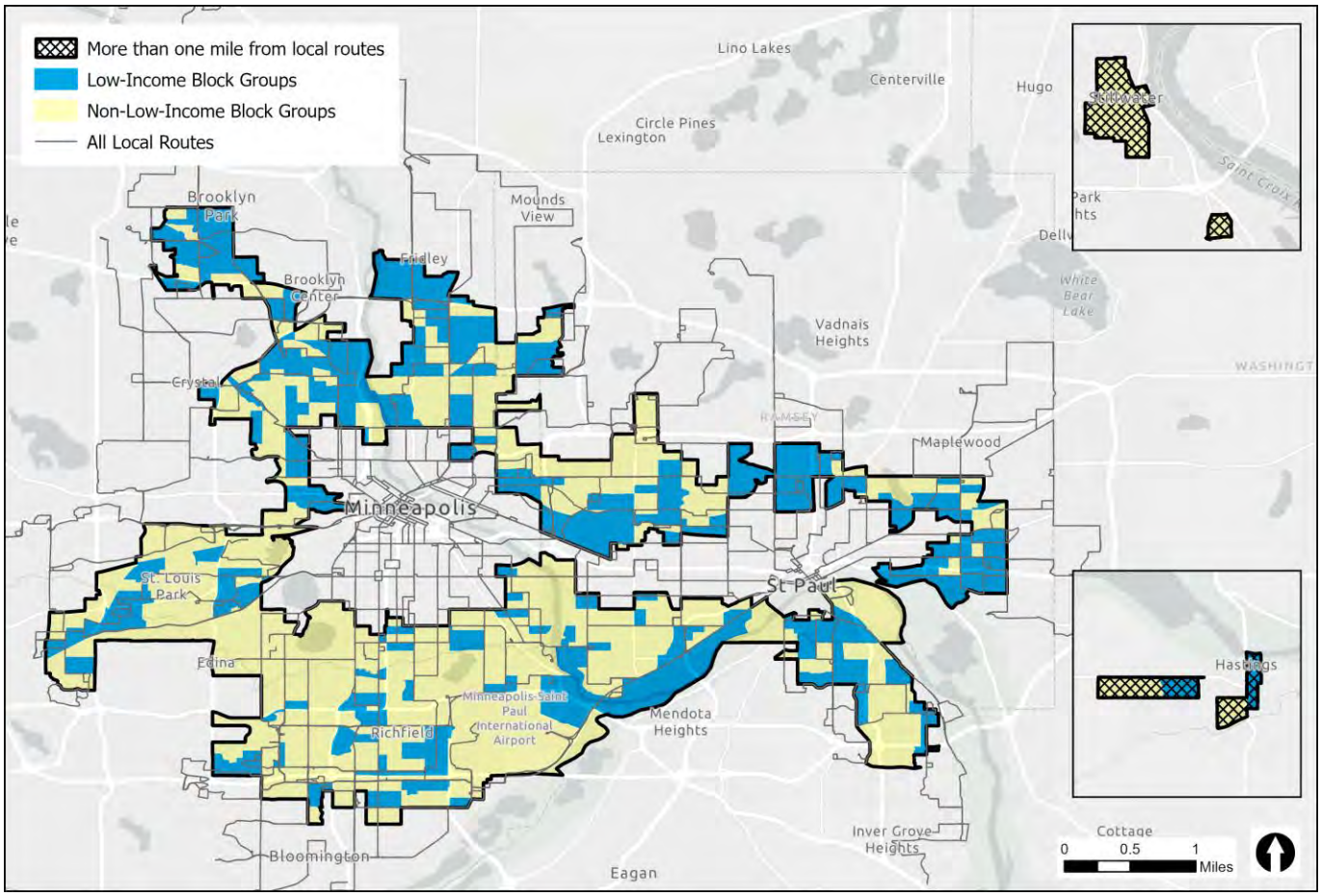


Figure 11. Market Area II – Local Route Spacing for Low-Income Block Groups



APPENDIX H: MIDDAY SERVICE AVAILABILITY

Midday service availability for Market Areas I, II, and III in fall 2023 is shown in Figure 12 and Figure 13, for BIPOC and low-income block groups 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.

Figure 12. Midday Service Standards Compliance in Market Areas I, II and III – BIPOC Block Groups

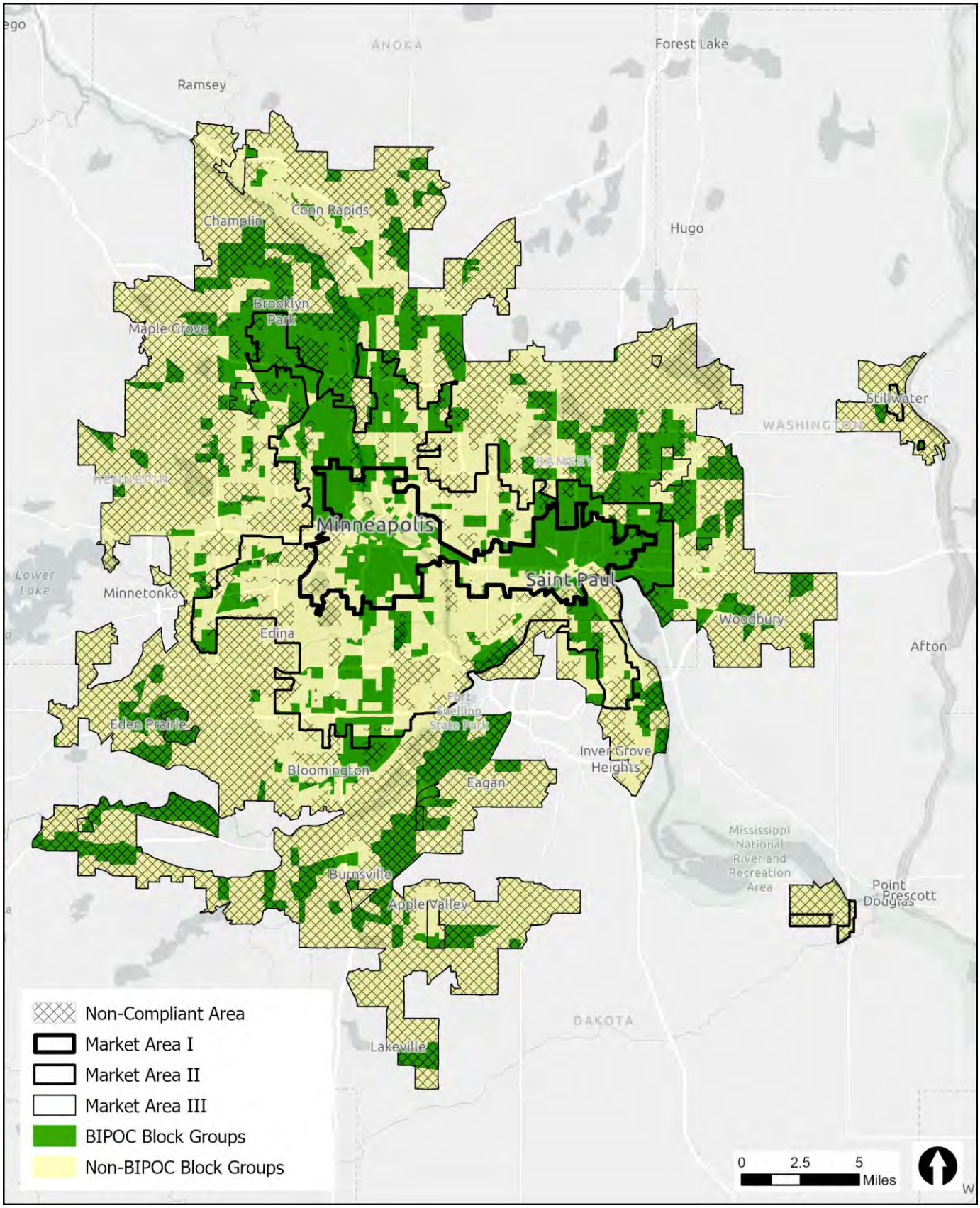
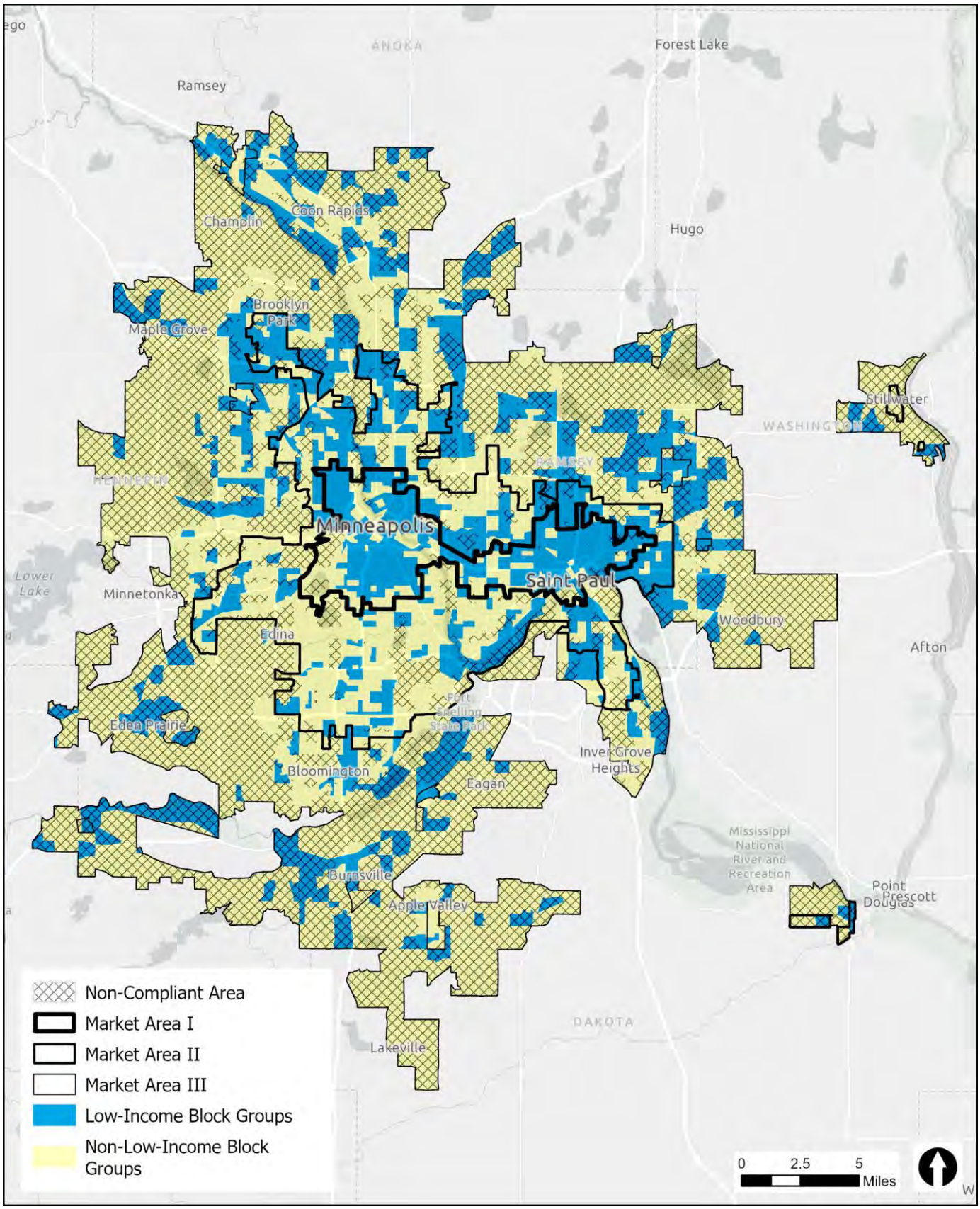


Figure 13. Midday Service Standards Compliance in Market Areas I, II and III – Low-Income Block Groups



APPENDIX I: VEHICLE ASSIGNMENT

Table 28. Vehicle Age in Years by Route

Route type abbreviations: CL = core local; Supp L = supporting local; Sub L = suburban local; C&E = commuter & express; ABRT = arterial BRT; 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	9.2	2.7	11.5		Newer
3	CL	B	LI	5.7	4.6	10.6		Newer
4	CL	B	LI	9.4	2.0	11.3		Newer
5	Supp Loc	B	LI	9.8	2.2	10.6		Newer
6	CL	NB	LI	9.4	2.5	10.4		Newer
7	CL	B	LI	10.1	1.8	10.4		Newer
9	CL	B	LI	8.8	2.4	11.5		Newer
10	CL	B	LI	9.9	2.1	10.6		Newer
11	CL	B	LI	9.3	2.7	11.5		Newer
14	CL	B	LI	8.7	1.8	10.4		Newer
17	CL	B	LI	9.4	2.6	11.5		Newer
18	CL	B	LI	9.0	3.1	10.4		Newer
21	CL	B	LI	8.8	2.6	10.6		Newer
22	CL	B	LI	9.9	1.7	10.6		Newer
23	Supp Loc	NB	LI	9.2	2.7	11.5		Newer
25	CL	B	LI	8.8	2.0	10.6		Newer
30	Supp Loc	B	LI	1.7	2.4	10.8		Newer
32	Supp Loc	B	LI	8.5	1.7	11.5		Newer
33	Supp Loc	B	LI	5.0	0.0	5.0	0.0	More than 1 std. older
46	Supp Loc	NB	LI	8.6	2.7	11.5		Newer
54	CL	B	LI	9.7	2.0	10.4		Newer
61	CL	B	LI	8.9	2.0	10.6		Newer
62	CL	B	LI	9.7	1.9	10.6		Newer
63	CL	B	LI	9.8	2.0	10.6		Newer
64	CL	B	LI	10.1	1.8	10.6		Newer
65	Supp Loc	B	LI	6.6	2.6	4.6	2.0	Not sig. older

Route	Route Type	Race/Ethnicity Designation	Income Designation	Assigned Avg.	Assigned Std.	Available Avg.	Difference if Older	Assigned Relative to Available
67	CL	B	LI	4.7	3.9	10.8		Newer
68	CL	B	LI	9.8	1.8	10.6		Newer
70	CL	B	LI	1.1	0.6	10.8		Newer
71	CL	B	LI	9.8	1.9	10.6		Newer
74	CL	B	LI	9.7	2.0	10.6		Newer
75	CL	B	LI	7.0	1.9	4.6	2.4	More than 1 std. older
80	Supp Loc	B	LI	4.2	4.0	10.8		Newer
83	Supp Loc	B	LI	5.0	0.2	11.2		Newer
87	Supp Loc	B	LI	6.5	2.7	4.6	1.9	Not sig. older
94	C&E	B	LI	9.5	2.2	10.6		Newer
113	C&E	B	NLI	9.7	2.3	10.4		Newer
114	C&E	NB	NLI	9.6	2.5	10.6		Newer
219	Sub Loc	B	LI	5.0	0.1	5.0	0.0	Not sig. older
225	Sub Loc	NB	LI	5.0	0.1	5.0	0.0	Not sig. older
227	Sub Loc	NB	LI	5.0	0.1	5.0	0.0	Not sig. older
250	C&E	B	NLI	7.7	4.5	10.7		Newer
252	C&E	B	LI	6.6	5.1	10.7		Newer
264	C&E	B	LI	8.6	4.3	10.7		Newer
270	C&E	B	NLI	6.9	4.0	10.6		Newer
275	C&E	B	NLI	9.0	1.5	10.7		Newer
294	C&E	NB	LI	8.9	2.6	10.6		Newer
323	Sub Loc	B	LI	8.5	1.9	10.8		Newer
353	C&E	B	LI	7.2	4.1	10.7		Newer
355	C&E	NB	LI	7.1	3.7	10.6		Newer
363	C&E	B	NLI	8.9	1.8	10.7		Newer
467	C&E	B	LI	11.0	0.0	12.1		Newer
501	Sub Loc	NB	LI	9.4	2.3	10.6		Newer
515	Sub Loc	B	LI	10.4	1.7	10.4		Newer
534	Sub Loc	B	LI	6.8	2.3	4.6	2.2	Not sig. older
537	Sub Loc	NB	LI	6.8	2.3	4.6	2.2	Not sig. older

Route	Route Type	Race/Ethnicity Designation	Income Designation	Assigned Avg.	Assigned Std.	Available Avg.	Difference if Older	Assigned Relative to Available
538	Sub Loc	NB	LI	7.1	2.4	4.6	2.6	More than 1 std. older
539	Sub Loc	B	LI	6.8	1.9	4.6	2.2	More than 1 std. older
540	Sub Loc	NB	LI	6.1	3.8	4.6	1.5	Not sig. older
542	Sub Loc	NB	LI	7.1	3.4	4.6	2.5	Not sig. older
546	Sub Loc	NB	NLI	7.4	2.0	4.6	2.8	More than 1 std. older
578	C&E	B	LI	9.8	2.2	10.4		Newer
612	Sub Loc	NB	LI	8.8	2.8	11.5		Newer
615	Sub Loc	B	LI	4.9	0.3	5.0		Newer
645	Sub Loc	NB	LI	9.1	3.2	10.6		Newer
667	C&E	B	NLI	10.1	2.1	10.6		Newer
673	C&E	NB	NLI	3.3	4.4	10.6		Newer
705	Sub Loc	B	LI	2.4	3.1	10.8		Newer
716	Sub Loc	B	LI	4.9	0.3	5.0		Newer
717	Sub Loc	B	LI	5.0	0.2	5.0	0.0	Not sig. older
721	Sub Loc	B	LI	9.9	1.7	10.6		Newer
722	Sub Loc	B	LI	10.0	1.6	10.6		Newer
723	Sub Loc	B	LI	10.0	1.6	11.5		Newer
724	Sub Loc	B	LI	10.0	1.7	10.6		Newer
755	C&E	B	LI	8.9	1.9	11.5		Newer
760	C&E	B	LI	9.8	1.9	10.6		Newer
761	C&E	B	LI	9.8	2.1	11.5		Newer
763	C&E	B	LI	9.3	2.0	11.5		Newer
764	C&E	B	LI	10.3	2.2	10.6		Newer
766	C&E	NB	NLI	9.0	3.4	10.6		Newer
768	C&E	B	NLI	7.0	4.8	10.7		Newer
801	Sub Loc	B	LI	1.1	1.0	10.8		Newer
804	Sub Loc	B	LI	1.1	0.8	10.8		Newer

Route	Route Type	Race/Ethnicity Designation	Income Designation	Assigned Avg.	Assigned Std.	Available Avg.	Difference if Older	Assigned Relative to Available
805	Sub Loc	NB	NLI	1.2	1.1	10.8		Newer
824	C&E	B	NLI	9.8	2.0	11.5		Newer
850	C&E	B	NLI	7.5	4.7	10.7		Newer
852	C&E	B	LI	8.5	1.8	10.8		Newer
888	CR	B	NLI	-	-	Combination Missing		-
901	LRT	B	LI	-	-	Combination Missing		-
902	LRT	B	LI	-	-	Combination Missing		-
903	BRT	NB	LI	2.0	0.0	6.8		Newer
904	BRT	B	LI	2.8	2.1	10.4		Newer
921	ABRT	NB	LI	7.0	2.1	10.4		Newer
923	ABRT	B	LI	3.9	3.2	10.5		Newer
924	ABRT	B	LI	2.9	2.2	10.4		Newer

Attachment I: Minutes Noting Metropolitan Council Approval of Title VI Program

Minutes

Metropolitan Council

Meeting date: December 17, 2025 **Time**: 4:00 PM **Location:** 390 Robert Street

Members present:

- ☒ Chair, Robin Hutcheson
- ☒ Judy Johnson, District 1
- ☒ Reva Chamblis, District 2
- ☒ Tyronne Carter, District 3
- ☒ Deb Barber, District 4
- ☒ John Pacheco Jr., District 5
- ☐ Robert Lilligren, District 6
- ☒ Yassin Osman, District 7
- ☒ Anjuli Cameron, District 8
- ☒ Diego Morales, District 9
- ☒ Peter Lindstrom, District 10
- ☒ Gail Cederberg, District 11
- ☒ Mark Jenkins, District 12
- ☒ Chai Lee, District 13
- ☒ Toni Carter, District 14
- ☒ Victor Obisakin, District 15
- ☒ Wendy Wulff, District 16

☒ = present

Dakota Land, Water, and People Acknowledgment

The Metropolitan Council acknowledges that the land we currently call Minnesota and specifically the seven-county region is the ancestral homeland of the Dakota Oyate who are present and active contributors to our thriving region. As part of the Metropolitan Council's commitment to address the unresolved legacy of genocide, dispossession, and settler colonialism and the fact that government institutions, including the Metropolitan Council, benefitted economically, politically, and institutionally after the forceable removal of the Dakota Oyate, the Metropolitan Council is dedicated to instilling Land, Water, and People Commitments in regional policy. These commitments support the Dakota Oyate, the eleven federally recognized Tribes in Minnesota, Ho-Chunk Nation, and the American Indian Communities representing over 150 diverse Tribal Nations that call the seven-county region home.

Call to order

A quorum being present, Council Chair Hutcheson called the regular meeting of the Metropolitan Council to order at 4:02 p.m.

Dakota Land, Water, and People Acknowledgment

The Dakota Land, Water, and People Acknowledgment was read by Council Member Toni Carter.

Agenda approved

Council Members did not have any comments or changes to the agenda.

Approval of minutes

It was moved by Chamblis, seconded by Morales to approve the minutes of the December 3, 2025, regular meeting of the Metropolitan Council. **Motion carried**.

Public invitation

No public comments were made.

Consent business

Consent business adopted (Items 1-7)

1. **2025-295:** That the Metropolitan Council adopt the attached Advisory Comments and Review Record and take the following actions:

   1. Authorize the City of Norwood Young America to place its comprehensive plan amendment into effect.
   2. Find that the amendment does not change the City of Norwood Young America's forecasts.

2. **2025-302:** That the Metropolitan Council update the Plat Monitoring Program as follows:

   1) For cities enrolled in the Plat Monitoring Program, the Met Council will calculate net residential density by combining the average net density of the city's last 10 years of actual platting or the average net density of the city's last 10 plats, if fewer than 10 plats have been recorded in the last 10 years, and the lowest allowable density on land identified to support forecasted growth for the relevant staging period. Cities may elect not to have their plat monitoring program data included in the calculations.

   2) Eligibility for the Plat Monitoring Program should be restricted to cities with the Suburban Edge and Rural Center community designations.

3. **2025-307:** That the Metropolitan Council authorize the Regional Administrator to execute sole source with Voestalpine Railway Systems Nortrak LLC in an amount not to exceed $5,562,950.

4. **2025-309:** That the Metropolitan Council shall approve the 2026-2028 Title VI Program.

5. **2025-310:** That the Metropolitan Council:

   1. Accept the Public Comment Summary Report on the draft amendment to the 2050 Regional Parks and Trails Policy Plan; and

   2. Adopt the revised final 2050 Regional Parks and Trails Policy Plan Amendment as shown in Attachment 2.

6. **2025-312:** That the Metropolitan Council adopt the attached updated Management of Regional Assets Policy, FM 8-1.

7. **2025-316:** That the Metropolitan Council authorize the City of Ramsey to sell two parcels purchased with Right-of-Way Acquisition Loan Fund Loan Numbers L0505 and L0609 for the agreed upon combined value of $2 million, forward these funds less customary closing costs to the Metropolitan Council in satisfaction of these loans, and direct staff to write-off the remaining loan balances.

   It was moved by Osman, seconded by Toni Carter.

   Motion carried.

Non-consent business – Reports of standing committees

Joint reports

1. **2025-227 JT:** That the Metropolitan Council ("the Council") authorize the Regional Administrator to negotiate and execute a loan agreement with the Minnesota Department of Transportation ("MnDOT") for coordinated corridor construction of roadway improvements on the METRO F Line corridor.

   It was moved by Barber, seconded by Osman.

   Motion carried.

Community Development

1. **2025-304:** That the Metropolitan Council:

    1. Set the grant award amounts for the 2050 Planning Assistance Grant Program as follows:
        a. The base award amounts for eligible communities are as follows:
            i. Sewered communities: $40,000
            ii. Unsewered communities: $25,000
            iii. County or Consortium: $110,000
        b. Eligible Planning Assistance Grant Program participants may choose to opt-in to either or both of the following incentive grants:
            i. Advancing Regional Goals: $10,000
            ii. Early Plan Completion: $4,000
            iii. If an eligible participant opts into an incentive grant program and later either chooses not to or is unable to complete program requirements, they shall forfeit those grant dollars but there shall be no penalty.
    2. Set the funding amounts for the 2050 Small Communities Planning Program as follows:
        a. Each eligible community shall have an identified not-to-exceed (NTE) engineering budget allocation based on need and expected planning effort as determined by the type of wastewater and water supply services further detailed in Table 3 and Attachment 1 of this report.
        b. Any additional engineering costs would be required to be the responsibility of the local government.

    It was moved by Toni Carter, seconded by Morales.

    Motion carried.

2. **2025-315 SW:** That the Metropolitan Council approve attached resolution 2025-40, adopting Livable Communities Act Affordable and Life-Cycle Housing Goals for 2021-2030 adopted by the cities of Anoka, Champlin, and Norwood Young America for participation in the Livable Communities Act programs for 2026-2030.

    It was moved by Toni Carter, seconded by Barber.

    Motion carried.

Environment

1. No reports.

Management

1. **2025-292:** That the Metropolitan Council approves the 2026 Non-Represented Plan changes effective December 20, 2025, incorporating the revisions as summarized in the Summary of Changes attached.

    It was moved by Johnson, seconded by Osman, to amend business item 2025-292, by inserting in Exhibit B of the 2026 Non-Represented Plan the Job Classification of Chief Security Officer, with a Salary Grade of E-1. Motion to amend carried.

    It was moved by Johnson, seconded by Morales.

    Motion as amended carried.

2. **2025-303 SW:** That the Metropolitan Council (Met Council) approve the 2025 Municipal Inflow and Infiltration (I/I) Grant Program guidelines and authorize the Regional Administrator to award and execute grants and grant agreements pursuant to the guidelines outlined in Attachments A and B.

   It was moved by Cederberg, seconded by Tyronne Carter.

   Motion carried.

3. **2025-306:** The Metropolitan Council adopt Resolutions 2025-37, 2025-38, 2025-39, authorizing the issuance, sale and award of general obligation debt, the incurrence of related issuance expenses, and the execution of documents necessary to secure the financings.

   It was moved by Johnson, seconded by Morales.

   Motion carried.

Transportation

1. No reports.

Other business

1. No reports.

Information

1. No reports.

Reports

Chair Hutcheson shared Governor Walz' announcement of Tim O'Malley as Director of Program Integrity and his commitment to reducing fraud. Chair thanked Council staff for their dedication and commitment to the mission of the Council.

Regional Administrator shared Northstar transition plans – January 4, 2026 is the final trip before transitioning to bus service. Regional Administrator thanked staff for their hard work, particularly aligning budget schedule to Council meeting timeline.

Adjournment

Business completed; the meeting adjourned at 4:37 p.m.

Certification

I hereby certify that the foregoing narrative and exhibits constitute a true and accurate record of the Metropolitan Council meeting of December 17, 2025.

Council contact:

Mee Cheng, Recording Secretary
Mee.Cheng@metc.state.mn.us
651-602-1222