TITLE VI ANALYSIS OF COVID-19 Service adjustments

Public comments are due by February 15, 2021 at 2 p.m.



METRO RTA Title VI Analysis of COVID-19 Service Adjustments

Introduction

Like METRO RTA, transit agencies across the country faced numerous challenges during the COVID-19 public health emergency. As ridership and revenues fell, the need to ensure reliable and safe service for essential trips was more important than ever. In April 2020, it became necessary to adjust service in order to promote social distancing and accommodate METRO's temporarily reduced workforce during this time of unprecedented health, family and personal needs. This service was the first of our contingency services. To accommodate changing demands throughout this challenging time, METRO made minor adjustments to schedules in June 2020, August 2020 and January 2021 to ensure safety, adapt to available resources, and improve connections for essential trips.

As we continue to navigate through the on-going pandemic, we plan to continue the temporary service adjustments made over the past 10 months for the near future. The Federal Transit Administration (FTA) requires transit agencies to complete an equity analysis for any major service change to comply with Title VI of the Civil Rights Act of 1964. This also applies to changes made in response to an emergency (such as COVID-19) that last longer than 12 months. To ensure that our continuing contingency service will not disparately impact minority populations and/or disproportionately burden low income populations, METRO has evaluated all of its routes to determine if the threshold of 'major service change as a change of more than 25% to a given route's weekly mileage. In alignment with the requirements set forth in both federal and agency policies, METRO is providing the public with an equity analysis of the major service changes that have been made since April 2020.

As we look beyond COVID-19 to METRO's future, we will use the recommendations outlined in the recently completed Strategic Plan to guide our service improvements. This process will start with a Comprehensive Operational Analysis and Transit Development Plan which will kick off in the second quarter of 2021. Alongside this in-depth analysis of our system and service, there will be many opportunities for our riders and the community we serve to provide their input into the specific shape that these service improvements take. Additional in-depth equity analyses will take place for any future service change recommendations resulting from this evaluation. We expect that public outreach and engagement will begin in the fourth quarter of 2021.

Service Equity Analyses for Changes Due to COVID-19 Pandemic

The following routes were identified as having a major service change between April 2020 and January 2021:

- Route x60: Service is temporarily suspended.
- Grocery Bus: Service is temporarily suspended.
- Routes #51, #53, and #59: Service is temporarily suspended. As an alternative, passengers can use METRO Connect by calling (330) 376-5353 one day in advance for weekday trips. (Fixed-route fare applies.)

- Routes 54 (DASH), x61, 101, 102, and 104: Number of trips is temporarily reduced (as currently scheduled).
- Route #1 and #50: Service between these two routes has been integrated to provide coverage to the most-used stops located in the Restaurant Hill area of Montrose.
- Route #10: Service has been increased to enhance connections and support ridership.

Because each of these routes had a change of more than 25% of weekly revenue miles, they are considered to be "major changes" per METRO's service policy. In accordance with Title VI policies set forth by the Federal Transit Administration and METRO's service evaluation policies, each of the temporary service revisions have been evaluated in detail to understand the impact to all those we serve with a particular focus on ensuring equitable service for minority and low-income riders. METRO's Disparate Impact/Disproportionate Burden policy specifies that

"A major service change should not adversely affect (loss) or benefit (gain) a minority or low-income population twenty percent (20%) more or less than non-minority or non-low income populations as determined by demographic analysis of proposed changes and U.S. Census data and/or transit rider survey data. *This level of impact will be considered a disparate impact on minority populations, or a disproportionate burden on low income populations.*"

To understand the potential impact to these communities in our service area, a detailed analysis looked at the percent change in route miles and compared the potential impact of service adjustments to the non-minority and low-income ridership on each route (as determined by the January 2020 METRO On-Board Survey). If the impact was calculated to be more than 20% for a particular route, it was identified as having the potential for a disparate impact or disproportionate burden.

As an example, if route miles were reduced by 50%, and the minority ridership on that particular route was 75%, the route adjustment would have a disparate impact because the impact to minority riders would be 24.5% more than for non-minority riders

-50% Route Miles x 75% Minority Ridership = 37.5% -50% Route Miles x 25% Non-Minority Ridership = 12.5%

37.5% impact to Minority Ridership - 12.5% impact to Non-Minority Ridership = 25% = Disparate Impact

After this analysis, several routes did show the potential for disparate impact or disproportionate burden. In those instances, specific alternative service arrangements have been implemented to eliminate the potential disparate impact or disproportionate burden. Table 1 summarizes these findings and associated adjustments.

Route	Percent Minority Ridership 2020 On-Board Survey (METRO Average 55.2%)	Disparate Impact?	Percent Low-Income Ridership 2020 On-Board Survey (METRO Average: 64%)	Disproportionat e Burden?	Temporary Service Change Summary and Mitigation Efforts for Disparate Impact or Disproportionate Burden
#1 – West Market	50.2%	No	58.0%	No	 Service was added for this route to enhance connections and support social distancing on our highest ridership route. Alignment was modified to add service connections for the suspended Route #50.
#10 – Howard / Portage	36.1%	No	64.3%	No	• Additional frequency was added on this route to align with ridership needs, promote social distancing, and better support work connections.
#50 – Montrose Circulator	70.3%	Yes – however, alternative service has been provided	46.7%	No	 Route was temporarily suspended Alignment was modified on hourly Route #1 trips to ensure highest ridership stops are serviced while service is suspended.
#51 – Stow Circulator	67.0%	Yes – however, alternative service has been provided	65.5%	Yes – however, alternative service has been provided	 Route has been temporarily suspended METRO Connect Service is a demand response service offered to customers using stops along route alignment While a slightly shorter span of service, riders on the route have potentially more direct trips at the same cost as fixed route service.

Table 1: Summary of Disparate Impact/Disproportionate Burden for Adjusted Routes

Route	Percent Minority Ridership 2020 On-Board Survey (METRO Average 55.2%)	Disparate Impact?	Percent Low-Income Ridership 2020 On-Board Survey (METRO Average: 64%)	Disproportionat e Burden?	Temporary Service Change Summary and Mitigation Efforts for Disparate Impact or Disproportionate Burden
#53 – Portage / Graham	16.5%	No	65.4%	Yes – however, alternative service has been provided	 Route has been temporarily suspended METRO Connect Service is a demand response service offered to customers using stops along route alignment While a slightly shorter span of service, riders on the route have potentially more direct trips at the same cost as fixed route service.
#54 DASH	55.1%	No	66.7%	Yes – however, alternative service has been provided	 Frequency for this service has been reduced in response to reduced ridership and reduced activity on the University of Akron campus. In addition, most of METRO's routes run through downtown Akron and provide another option for riders inconvenienced by the route frequency
#59 – Chapel Hill Circulator	20.6%	No	45.2%	No	 Route has been temporarily suspended METRO Connect Service is a demand response service offered to customers using stops along route alignment While a slightly shorter span of service, riders on the route have potentially more direct trips at the same cost as fixed route service.
#60 – NCX via C. Falls	62.7%	Yes – however, alternative service has been provided	0.0%	No	 While this route has been temporarily suspended, ridership plummeted when many commuters transitioned to work-from-home situations. Route will be reviewed again when normal commuting patterns resume.

Route	Percent Minority Ridership 2020 On-Board Survey (METRO Average 55.2%)	Disparate Impact?	Percent Low-Income Ridership 2020 On-Board Survey (METRO Average: 64%)	Disproportionat e Burden?	Temporary Service Change Summary and Mitigation Efforts for Disparate Impact or Disproportionate Burden
#61 – NCX via Akron /Montrose	57.6%	No	23.7%	No	 While trips on this route have been temporarily reduced, ridership plummeted when many commuters transitioned to work-from-home situations. When adjusting trips, special consideration was given to ensuring each trip provided service to the VA Hospital.
#101 – Richfield / Bath	26.2%	No	73.8%	No	 Same service span, trips have been reduced with a focus on ensuring work trip connections. Since April 2020, trips have been added and time adjustments have been made to accommodate essential trips (per customer feedback) Supporting access for minority and poverty populations to growing employment opportunities in northeast Summit County.
#102 – Northfield	59.4%	No	52.4%	No	 Same service span, trips have been reduced with a focus on ensuring work trip connections. Since April 2020, trips have been added and time adjustments have been made to accommodate essential trips (per customer feedback) Supporting access for minority and poverty populations to growing employment opportunities in northeast Summit County.

Route	Percent Minority Ridership 2020 On-Board Survey (METRO Average 55.2%)	Disparate Impact?	Percent Low-Income Ridership 2020 On-Board Survey (METRO Average: 64%)	Disproportionat e Burden?	Temporary Service Change Summary and Mitigation Efforts for Disparate Impact or Disproportionate Burden
#104 – Twinsburg / Creekside	67.9%	No	35.9%	No	 Same service span, trips have been reduced with a focus on ensuring work trip connections. Since April 2020, trips have been added and time adjustments have been made to accommodate essential trips (per customer feedback) Supporting access for minority and poverty populations to growing employment opportunities in northeast Summit County.
Grocery Routes*	55.8%*	No	30.5%*	No	 While the routes are temporarily suspended, 99% of stops served on the Grocery routes are within ¼ mile for of other METRO fixed route services. Since a high percentage of grocery riders are also seniors, their fixed route fare would be the same as the grocery fare (\$0.50). Additional Demand Response options are available for passengers with disabilities or riders over the age of 62.

*Grocery routes were not surveyed as part of Onboard Survey, therefore demographic data is from the 2017 ACS 5-yr Census data.

Service Equity Analysis

Each service adjustment that qualified as a Major Service Change was evaluated in depth to understand the overall impact to ridership between Winter 2020 (WIN 20) service and Winter 2021(WIN 21) service. While minor adjustments have been throughout the past 10 months, this evaluation shows the big picture of the changes between pre-COVID-19 pandemic levels to present day.

		Route Revenue Miles			Average Weekday Headway (minutes)		Weekday Span (hh:mm)			Weekday Trips	
								Change			
Derete	Description		WINI 01	% Classica	WIN	WIN 21	WIN	WIN	(in	WIN	WIN
Route	Description	WIN 20	WIN 21	Change	20	21	20	21	hours)	20	21
1	West Market	4888.80	6328.46	29%	26	21	19:41	19:12	-0.48	88	104
10	Howard/Portage Tr	3097.00	4016.99	30%	45	35	16:42	19:04	2.37	47	63
50	Montrose Circulator	1345.10	0.00	-100%	50	N/A	16:44	16:00	73	29	0
51	Stow Circulator	1753.50	0.00	-100%	39	N/A	16:24	10:00*	-6.4	36	0
53	Portage/Graham	1424.50	0.00	-100%	67	N/A	10:36	10:00*	-0.6	18	0
54	DASH Downtown	1633.00	643.00	-61%	11	30	16:20	13:50	-2.50	89	32
59	Chapel Hill Circulator	806.60	0.00	-100%	38	N/A	12:25	10:00*	-2.42	20	0
60	NC Express Chapel Hill	1051.00	0.00	-100%	90+	N/A	13:05	0:00	-13.08	5	0
61	NC Express Montrose	4430.50	2212.00	-50%	90+	90+	14:00	12:33	-1.45	22	12
101	Richfield/Bath	1753.50	1312.25	-25%	90+	90+	18:45	12:09	-6.60	16	12
102	Northfield Express	4761.50	2286.58	-52%	53	90+	18:30	18:20	-0.17	37	17
104	Twinsburg Creekside	3498.50	1880.18	-46%	75	90+	18:30	18:20	-0.17	30	16
91-95	Grocery	628.2	0.00	-100%	N/A	N/A	10:36- 16:24	N/A	10.6- 16.4	Varied	0

Table 2: Service Equity Chart Comparison of Route Metrics Pre-COVID-19 Service to Contingency Schedule

*METRO Connect Span

While ridership has significantly dropped for the system as a whole, Table 3 shows the impact to ridership on the routes that trip the threshold for a major service change. Of additional note is the reduction in vehicle load that has supported social distancing on our routes.

Table 3: Service Equity Analysis Chart Comparing Ridership Pre-COVID-19 Service to Contingency Service

			Average	Weekday 1	Passenge	rs	Average Weekday Load	
				%		%		
			Week	Change		Change		
		WIN	of	FEB 20	FALL	WIN		
		20	March	to	20	20	WIN 20	FALL 20
		(FEB	30,	MAR	(OCT	FALL	(FEB	(OCT
Route	Description	2020)	2020	20	2020)	20	2020)	2020)
1	West Market	1731	1124	-35%	1158	-33%	21.95%	15.62%
10	Howard/Portage Tr	791	543	-31%	542	-31%	18.45%	12.32%
50	Montrose Circulator	90	61	-32%	N/A	-100%	5.75%	N/A
51	Stow Circulator	108	72	-33%	N/A	-100%	5.09%	N/A
53	Portage/Graham	109	58	-47%	N/A	-100%	8.12%	N/A
54	DASH Downtown	877	271	-30%	66	-93%	*	*
59	Chapel Hill Circulator	61	42	-31%	N/A	-100%	6.60%	N/A
60	NC Express Chapel Hill	46	1	-98%	N/A	-100%	10.60%	N/A
61	NC Express Montrose	247	103	-58%	59	-76%	13.44%	6.23%
101	Richfield/Bath	58	36	-38%	36	-38%	6.76%	5.03%
102	Northfield Express	205	95	-54%	88	-57%	10.72%	11.28%
104	Twinsburg Creekside	143	103	-28%	84	-41%	7.75%	9.20%
91-95	Grocery	80	43	-46%	N/A	-100%	*	*

*No data available

Summary of Findings

Overall, one-third of METRO's routes had service modifications that required a deeper analysis to ensure that there was no disparate impact or disproportionate burden for our riders. While some changes met the 20% threshold as identified in METROs Disparate Impact/Disproportionate Burden policy, a variety of alternative service options have mitigated or eliminated the identified impact. This detailed analysis is presented for each route on the following pages, including a map showing minority and poverty population within the walkshed of each route.

While METRO has not intended these temporary service changes to be permanent, the FTA threshold of 12 months has required that METRO examine its continuing Contingency Service. Over the next several months, much more will be known about service needs as METRO undertakes a Comprehensive Operational Analysis and Transit Development Plan. The public will have many opportunities to engage with this process and ensure that future service adjustments are equitably meeting ridership needs.

Equity Analysis METRO RTA Trip increase and route modification #1: Akron/Montrose and #50: Montrose Circulator

Statement of Need: To adjust the number of trips serving routes with low ridership, and provide adequate service to accommodate social distancing on higher ridership routes.

Winter 2020 Service Conditions (prior to COVID-19 Service interruption): Route #1 provided service between downtown Akron (RKP Transit Center) and Montrose on W Market St/Medina Rd. Route #50 provided one-way loop service in the Montrose area.

Emergency Service Condition (implemented due to COVID-19): Route #50 has been temporarily suspended due to low ridership and productivity as of June 8, 2020. On Route #1, the alignment was extended to include a portion of the area previously served by the #50. This extension provides service to the bus stops that accounted for 93% of all #50 ridership during the week of March 30, 2020 (the week before the initial service adjustments). Additionally, headways on the #1 were increased due to ridership to accommodate social distancing and reduce vehicle loads. This resulted in a 29% increase in weekly revenue miles, therefore qualifying as a major service change.

Travel destinations served: Downtown Akron, Highland Square, Wallhaven, Fairlawn and Montrose.

Ridership: In February 2020, Route #1 had 1,731 passengers on an average weekday with a 19.7 hour span of service and 4888.8 weekly revenue miles. In March 2020 (the week before the initial service adjustments), average weekday ridership dropped to 1,124. This is likely connected to the reduced number of trips taken as a result of Governor DeWine's Stay at Home Order effective on March 24, 2020.

In February 2020, Route #50 had 90 passengers on an average weekday with 16.75 hour span of service and 1345.10 weekly revenue miles. In March 2020 (the week before the initial service adjustments), average weekday ridership dropped to 61. This is likely connected to the reduced number of trips taken as a result of Governor DeWine's Stay at Home Order effective on March 24, 2020.

Service Area and Corridor Demographics: According to the 2017 ACS survey, 23.4% of residents within METRO's service area identified as minority. In comparison, the minority population within ¹/₄ mile of stops adjacent to Route #1 is 43.1%. The minority population within ¹/₄ miles of stops adjacent to Route #50 is 0.0%. The minority population within ¹/₄ miles of stops adjacent to the extended Route #1 is 43.1%.

The service area percentage of persons below the poverty level is 15.6%. The percentage of population below the poverty level within ¹/₄ mile of stops on Route #1 is 35.7%. The percentage of population below the poverty level within ¹/₄ mile of stops on Route #50

has a poverty rate of 0.0% of the total population. The minority population within $\frac{1}{4}$ miles of stops adjacent to the extended Route #1 is 35.7%.

Service Area and Route Rider Demographics: According to the 2020 METRO On-Board Survey, 56.1% of METRO's riders identified as minority. In comparison, 50.2% of the riders on Route #1 and 70.3% of the riders on Route #50 identified as minority.

57.1% of METRO's total ridership identified having a household income level below the poverty level. In comparison, 58.0% of the riders on Route #1 and 46.7% of the riders on Route #50 identified having a household income level below the poverty level.

A **Service Map** is attached showing the route alignment and impacted population. This map also indicates the census blocks groups classified as minority and low-income that are within a ¹/₄ mile of stops along this route.

An **Equity Analysis Chart** is attached which details route performance in February 2020, late March 2020 (after the Governor's Stay at Home Order went into effect on March 24, 2020) and October 2020. In summary, this route saw the following impacts from this change:

Impacts of Service Changes:

- 1. Temporarily suspended service on Route #50
- 2. Extension of Route #1 alignment covering 93% of Route #50 ridership
- 3. Increased frequency on Route #1 which supports faster travel
- 4. Reduced Vehicle Loads on Route #1 for continued support of Social Distancing

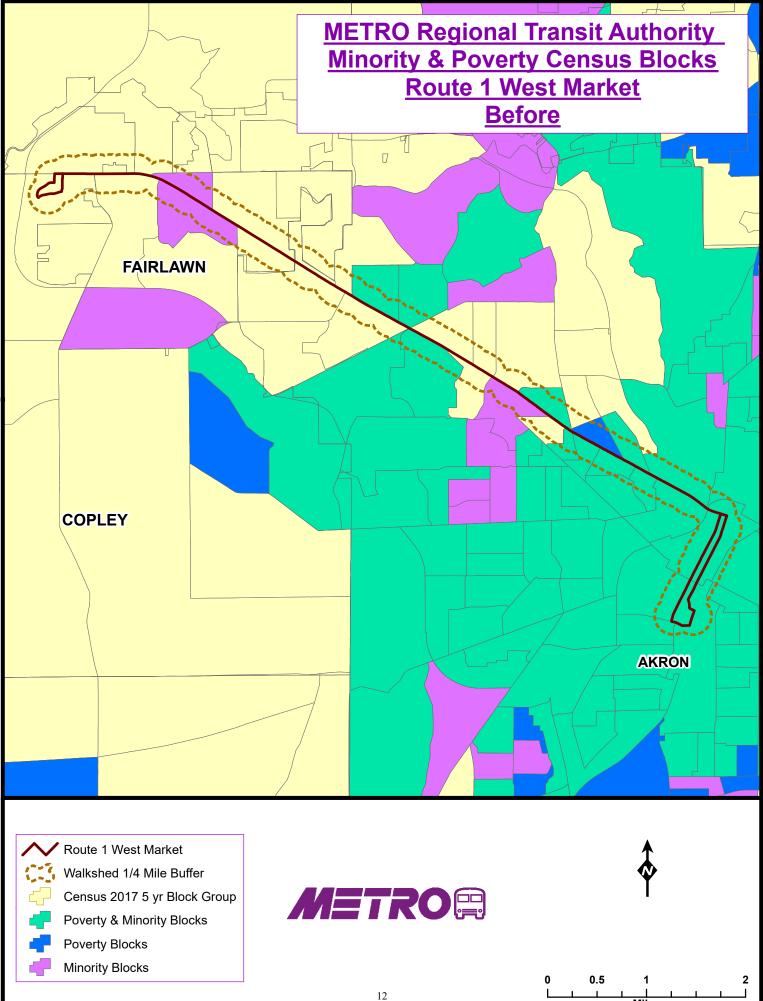
Assessment of Disparate Impact:

The suspension of Route #50 without the extension of Route #1 would have caused a disparate impact on minority populations based on the 2020 METRO On-Board Survey (as shown in Table 1 of the Report Summary). However, to mitigate this impact METRO extended Route #1 to provide service to bus stops accounting for 93% of the Route #50 ridership, thus eliminating the disparate impact.

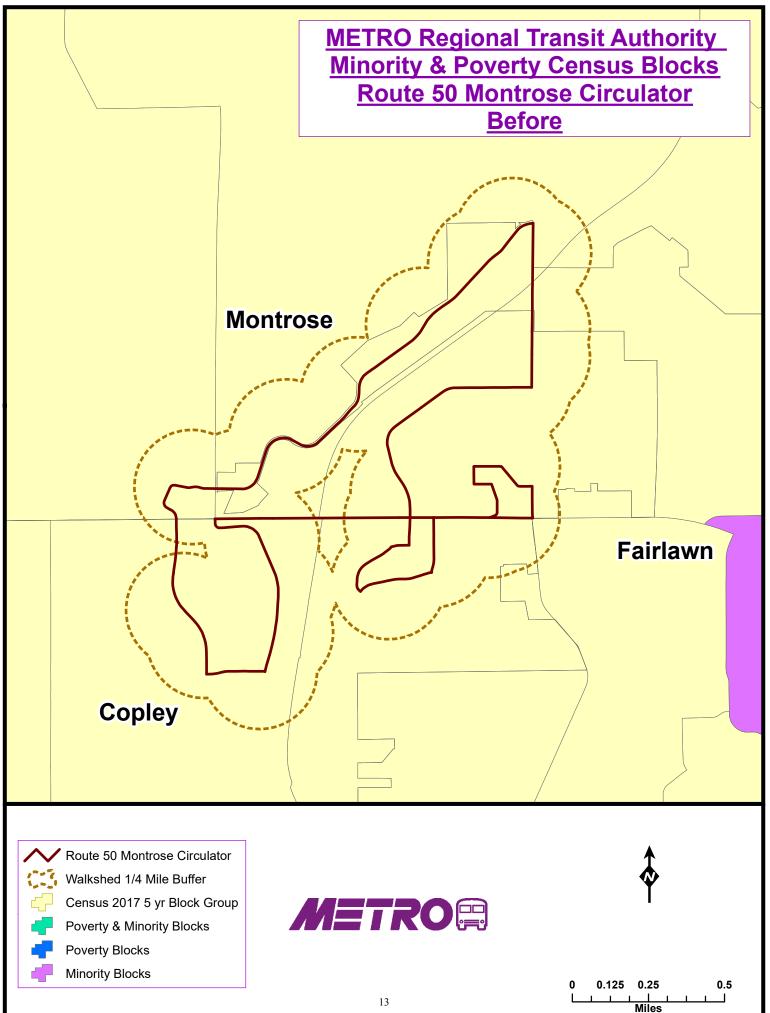
After evaluation of the service adjustments and increased frequency on Route #1 in comparison to the demographic information captured from the 2020 METRO On-Board Survey, this change does not create a disparate impact on minority populations as defined in METRO's Disparate Impact/Disproportionate Burden Policy.

Assessment of Disproportionate Burden:

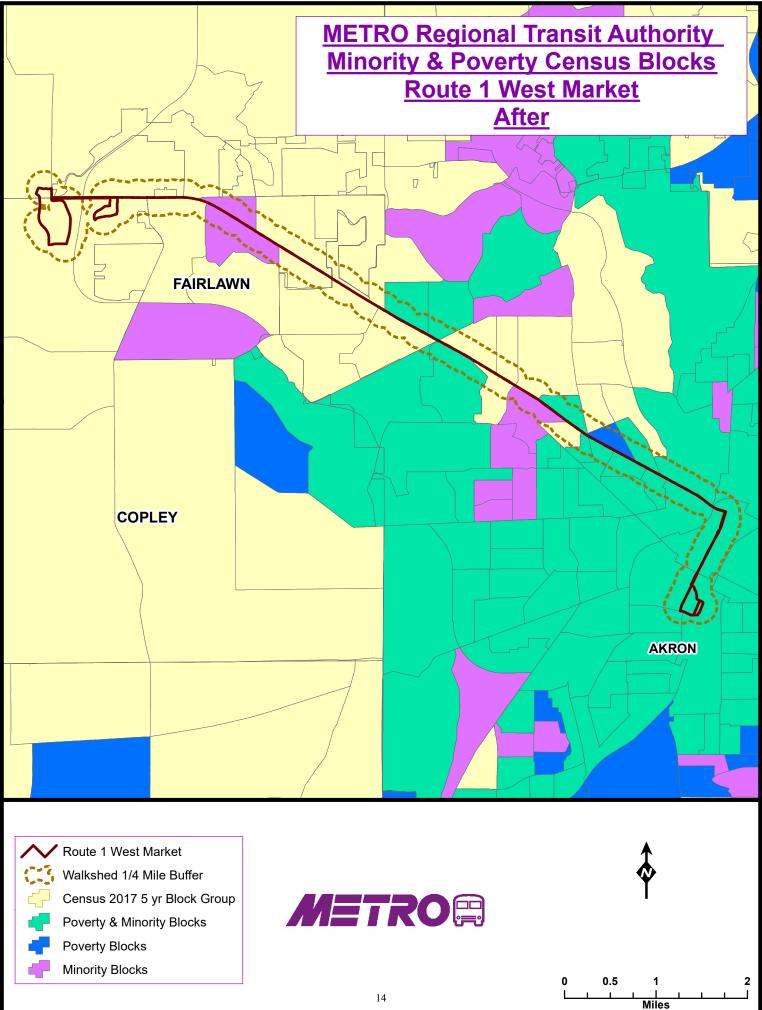
After evaluation of the service adjustments for Routes #1 and #50 in comparison to the demographic information captured from the 2020 METRO On-Board Survey, this change does not create a disproportionate burden on minority populations as defined in METRO's Disparate Impact/Disproportionate Burden Policy.



Miles



Data Source: ESRI. METRO RTA. U.S. Census Bureau



Equity Analysis METRO RTA Increased Frequency #10: Howard/Portage Trail

Statement of Need: To increase the number of trips to align with ridership needs, promote social distancing, and better support work connections.

Winter 2020 Service Conditions (prior to COVID-19 Service interruption): The route provided service between downtown Akron (RKP Transit Center), Portage Crossing, downtown Cuyahoga Falls and the Independence Transit Center (ITC).

Emergency Service Condition (implemented due to COVID-19): The alignment of the route was unchanged. Headways were decreased, resulting in a 29.7% increase in weekly revenue miles, therefore qualifying as a major service change.

Travel destinations served downtown Akron, Portage Crossing, Cuyahoga Falls and the east side of Akron.

Ridership: In February 2020, the #10 had 791 passengers on an average weekday with a 16.75 hour span of service and 3097 revenue miles. In late March 2020 (the week before initial service adjustments), average weekday ridership had dropped to 543 (a 31% reduction). This is likely connected to the reduced number of trips taken as a result of Governor DeWine's Stay at Home Order effective on March 24, 2020. This drop in ridership was less than the average ridership decrease across all routes.

Service Area and Corridor Demographics: According to the 2017 ACS survey, 23.4% of residents within METRO's service area identified as minority. In comparison, the minority population within ¹/₄ mile of stops on Route #10 is 46.0%.

The service area percentage of persons below the poverty level is 12.2%. The percentage of persons below poverty level within ¹/₄ mile of stops on the Route #10 is 28.9%.

Service Area and Route Rider Demographics: According to the 2020 METRO On-Board Survey, 56.1% of METRO's riders identified as minority. In comparison, 36.1% of riders on Route #10 identified as minority.

57.1% of METRO's total ridership identified having a household income level below the poverty rate. In comparison, 28.9% of riders on Route #10 identified having a household income level below the poverty rate.

A **Service Map** is attached showing the route alignment and impacted population. This map also indicates the census blocks groups classified as minority and low-income that are within a ¹/₄ mile of stops along this route.

An **Equity Analysis Chart** is attached which details route performance in February 2020, late March 2020 (after the Governor's Stay at Home Order went into effect on March 24, 2020) and October 2020. In summary, this route saw the following impacts from this change:

Summary of Service Changes:

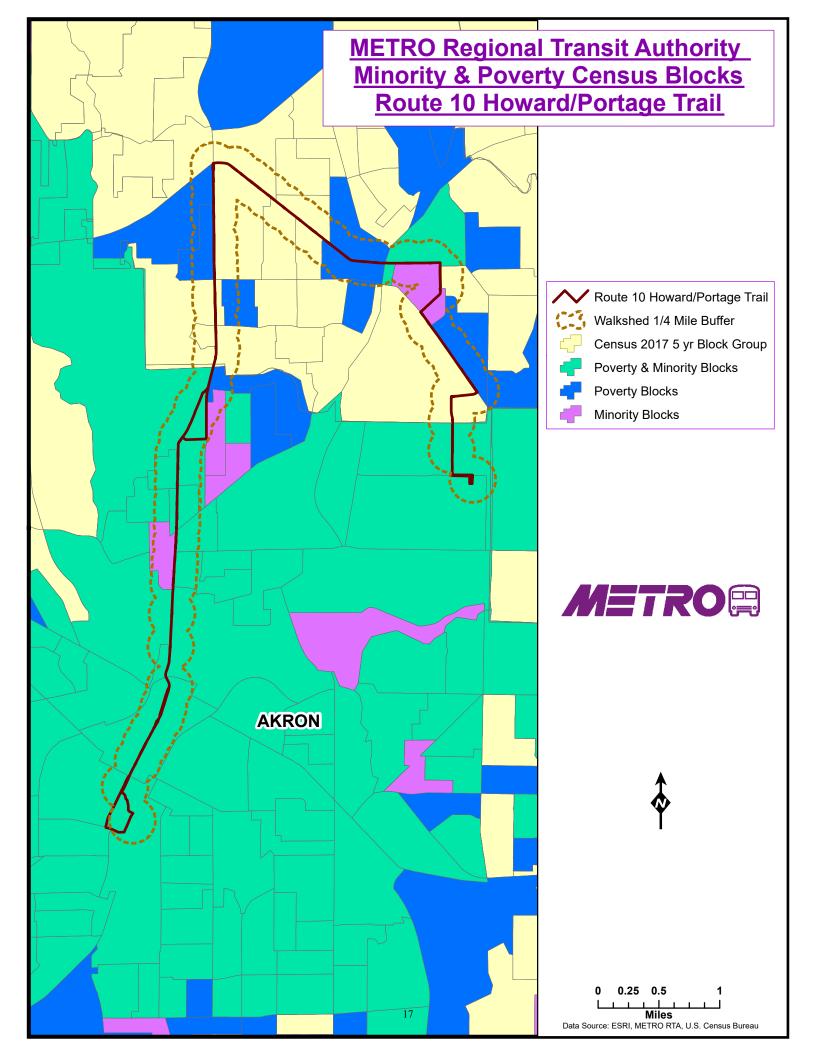
- 1. Increased frequency and span of service which supports faster travel.
- 2. Reduced Vehicle Loads for continued support of Social Distancing.

Assessment of Disparate Impact:

After evaluation of the service adjustments for this route in comparison to the demographic information captured from the 2020 METRO On-Board Survey, this change does not create a disparate impact on minority populations as defined in METRO's Disparate Impact/Disproportionate Burden Policy.

Assessment of Disproportionate Burden:

After evaluation of the service adjustments for this route in comparison to the demographic information captured from the 2020 METRO On-Board Survey, this change does not create a disproportionate burden on minority populations as defined in METRO's Disparate Impact/Disproportionate Burden Policy.



Equity Analysis METRO RTA Temporary Route Suspension #51, 53, 59 Stow, Portage, Chapel Hill Circulators

Statement of Need: To provide alternate service on routes with low ridership to ensure adequate resources were available to maintain social distancing throughout the system.

Winter 2020 Service Conditions (prior to COVID-19 service interruptions): These routes provided one-way loop circulator service within the municipalities of Stow, Cuyahoga Falls, Tallmadge and Munroe Falls.

Emergency Service Condition (implemented due to COVID-19): These routes have been temporarily suspended in June 2020 due to low ridership and productivity, therefore qualifying as a major service change. Since the suspension of these routes, METRO Connect has been implemented as an alternative service. METRO Connect is a demand response call-ahead service available Monday through Friday from 7 a.m. to 5 p.m. Passengers can schedule a trip to be picked up and dropped off at any bus stop previously served by Routes #51, #53 and #59. Fixed route bus fare applies for METRO Connect trips.

Travel destinations served: Chapel Hill and areas of Stow, Cuyahoga Falls, Tallmadge and Munroe Falls.

Ridership: In February 2020, these Circulators had a combined 278 passengers on an average weekday with 3,984.60 weekly revenue miles. Span of service ranged from 10.6 hours to 16.4 hours. In March 2020 (the week before the initial service adjustments), average weekday ridership for all three routes dropped to 172 passengers. This is likely connected to the reduced number of trips taken as a result of Governor DeWine's Stay at Home Order effective on March 24, 2020.

Service Area and Corridor Demographics: According to the 2017 ACS survey, 23.4% of residents within METRO's service area identified as minority. In comparison, the minority population within ¹/₄ mile of stops on Routes #51, 53 and 59 is 38.9%.

The service area percentage of persons below the poverty level is 15.6%. The percentage of population below the poverty level within $\frac{1}{4}$ mile of stops on the Route #51, 53, 59 is 19.3%.

Service Area and Route Rider Demographics: According to the 2020 METRO On-Board Survey, 56.1% of METRO's riders identified as minority. In comparison, 67.0% of the riders on Route #51, 16.5% of riders of Route #53, and 20.6% of riders on Route #59 identified as minority.

57.1% of METRO's total ridership identified having a household income level below the poverty rate. In comparison, 65.5% of the riders on Route #51, 65.4% of the riders on

Route #53, and 45.2% of riders on Route #59 identified having a household income level below the poverty rate.

A **Service Map** is attached showing the route alignment impacted population. This map also indicates the census blocks groups classified as minority and low-income that are within a ¹/₄ mile of stops along this route.

An **Equity Analysis Chart** is attached which details route performance in February 2020, late March 2020 (after the Governor's Stay at Home Order went into effect on March 24, 2020) and October 2020. In summary, this route saw the following impacts from this change:

Impacts of Service Changes:

1. Temporarily suspended regular service on all three routes.

2. Implemented METRO Connect service, a demand response service covering all bus stops previously served by Routes #51, #53, and #59.

Assessment of Disparate Impact:

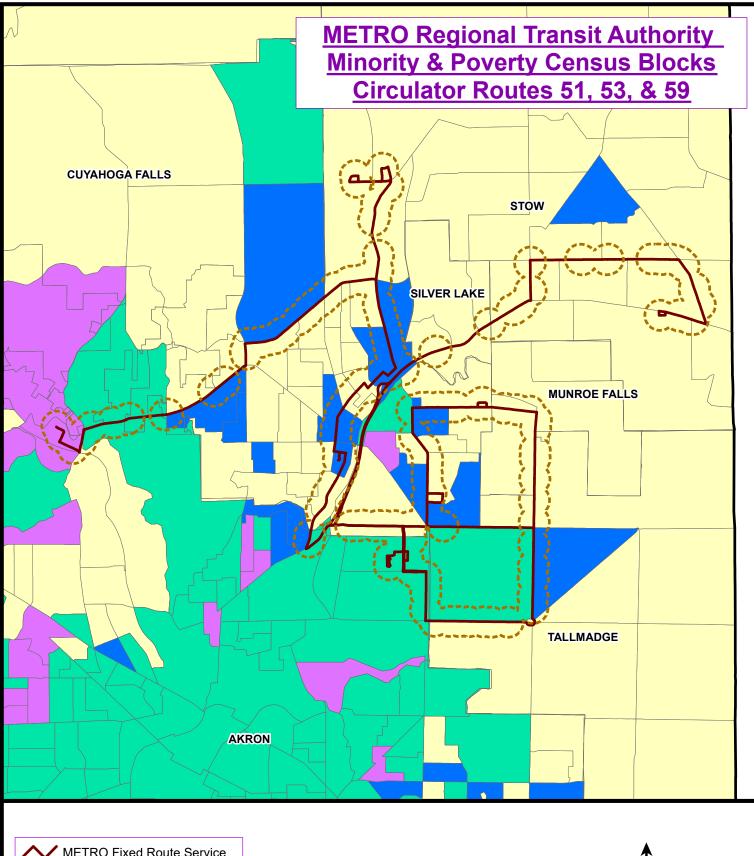
The suspension of Route #51 without the implementation of METRO Connect would have caused a disparate impact on minority populations based on the 2020 METRO On-Board Survey (as shown in Table 1 of the Report Summary). To mitigate this impact, METRO has provided a service alternative called METRO Connect, which provides Demand Response Service between stops along all three routes. This service is offered at the same fare as fixed route service and can potentially improve route directness by providing the ability to have a stop-to-stop trip on trips that previously would have required a transfer between two of the circulators. Since this can actually improve route directness and save time, this is considered to be an effective alternative service.

After evaluation of the service adjustments for Route #53 and #59 in comparison to the demographic information captured from the 2020 METRO On-Board Survey, this change does not create a disparate impact on minority populations as defined in METRO's Disparate Impact/Disproportionate Burden Policy.

Assessment of Disproportionate Burden:

The suspension of Routes #51 and #53 without the implementation of METRO Connect would have caused a disparate impact on minority populations based on the 2020 METRO On-Board Survey (as shown in Table 1 of the Report Summary). To mitigate this impact, METRO has provided a service alternative called METRO Connect, which provides Demand Response Service between stops along all three routes. This service is offered at the same fare as fixed route service and can potentially improve route directness by providing the ability to have a stop-to-stop trip on trips that previously would have required a transfer between two of the circulators. Since this can actually improve route directness and save time, this is considered to be an effective alternative service.

After evaluation of the service adjustments for Route #59 in comparison to the demographic information captured from the 2020 METRO On-Board Survey, this change does not create a disproportionate burden on minority populations as defined in METRO's Disparate Impact/Disproportionate Burden Policy.







Alternative Service now avalable through METRO Connect



Equity Analysis METRO RTA Trip reduction #54: DASH (serving downtown Akron and the University of Akron)

Statement of Need: To adjust the number of trips serving routes with low ridership to ensure adequate resources were available to maintain social distancing throughout the system.

Winter 2020 Service Conditions (prior to COVID-19 Service interruption): As developed with the University of Akron, the route provided service between RKP Transit Center, downtown Akron and the University of Akron.

Emergency Service Condition (implemented due to COVID-19): The alignment of the route remained unchanged, but the service was initially suspended in April 2020 due to significant ridership loss with the discontinuation of in-person classes. The route was returned to service at a reduced rate to support a lower number of students returning to campus with the August 2020 service change. Service was once-again suspended in November 2020 when classes went to the virtual environment and resumed in January 2021. The headways increased from 10 to 30 minutes, resulting in a 61% reduction in weekly revenue miles, therefore qualifying as a major service change.

Travel destinations served downtown Akron and the University of Akron.

Ridership: In February 2020, the DASH had 877 passengers on an average weekday with a 16.3 hour span of service and 1,633 revenue miles. In late March 2020 (the week before initial service adjustments), average weekday ridership had plummeted to 271 - a 70% drop in ridership. This can be attributed to discontinued on-campus learning at the University of Akron and the reduced number of trips taken as a result of Governor DeWine's Stay at Home Order effective on March 24, 2020.

Service Area and Corridor Demographics: According to the 2017 ACS survey, 23.4% of residents within METRO's service area identified as minority. In comparison, the minority population within ¹/₄ mile of stops on the DASH is 35.6%.

The service area percentage of persons below the poverty level is 12.2%. The percentage of population below the poverty level within ¹/₄ mile of stops on the DASH is 69.1%.

Service Area and Route Rider Demographics: According to the 2020 METRO On-Board Survey, 56.1% of METRO's riders identified as minority. In comparison, 55.1% of riders on the DASH identified as minority.

57.1% of METRO's total ridership identified having a household income level below the poverty rate. In comparison, 66.7% of riders on the DASH identified having a household income level below the poverty rate. Many riders on this route are University of Akron students who, due to their student status, likely fall into the low income category.

A **Service Map** is attached showing the route alignment and impacted population. This map also indicates the census blocks groups classified as minority and low-income that are within a ¹/₄ mile of stops along this route.

An **Equity Analysis Chart** is attached which details route performance in February 2020, late March 2020 (after the Governor's Stay at Home Order went into effect on March 24, 2020) and October 2020. In summary, this route saw the following impacts from this change:

Summary of Service Changes:

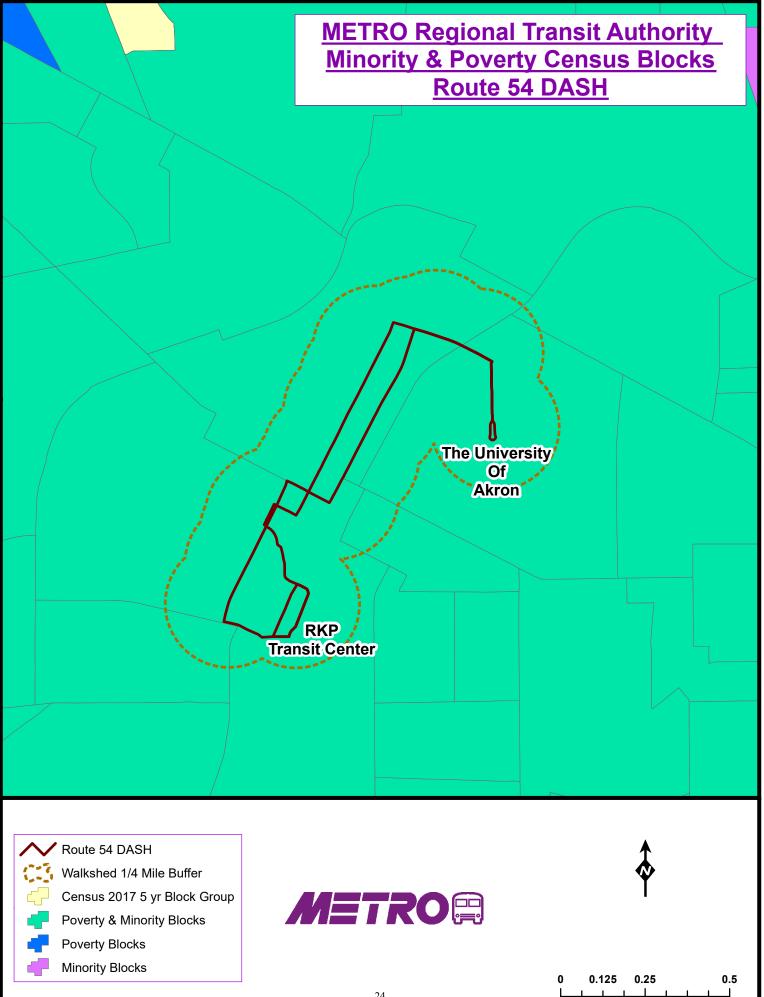
- 1. Reduced frequency to respond to decreased ridership due to the University transitioning to online learning or hybrid learning. The same span of service was maintained.
- 2. The route alignment remained unchanged.
- 3. Service has been adjusted to support the needs expressed by the University for reduced on-campus activity.

Assessment of Disparate Impact:

After evaluation of the service adjustments for this route in comparison to the demographic information captured from the 2020 METRO On-Board Survey, this change does not create a disparate impact on minority populations as defined in METRO's Disparate Impact/Disproportionate Burden Policy.

Assessment of Disproportionate Burden:

The ridership on this route is more likely to be low income, and upon analysis, there is a disproportionate burden on low income riders. This is likely due to the mainly student status of the riders on this route. Demand for the route dropped significantly when the University went to virtual learning and remained low when the hybrid learning option was in place. Because service is still being continued at a lower frequency and many additional routes serve this area, riders do have alternatives to provide more-frequent service within this corridor. No further mitigation measures are necessary at this time, and it is anticipated that frequency increase on this route when demand for service increases.



Miles ESRI METRO RT

Equity Analysis METRO RTA Temporary Route Suspension x60 Northcoast Express: Cuyahoga Falls/Twinsburg to Cleveland

Statement of Need: To reduce service on routes with low ridership, especially with commuter service that appealed to office workers in Downtown Cleveland many of whom are working from home during the COVID-19 pandemic.

Winter 2020 Service Conditions (prior to COVID-19 service interruptions): The route provided service between downtown Akron (RKP Transit Center), Highland Square and the James Fisher Park and Ride to Downtown Cleveland.

Emergency Service Condition (implemented due to COVID-19): This route has been temporarily suspended in response to many of our commuter riders transitioning to work-at-home situations, therefore qualifying as a major service change.

Travel destinations served downtown Cuyahoga Falls, Hudson, Twinsburg and Cleveland.

Ridership: In February 2020, the x60 had 46 average weekday passengers with a 14 hour span of service and 1,051 weekly revenue miles. In late March 2020 (the week prior to initial service adjustments), the average daily ridership had plummeted to 1 person. This is likely connected to the reduced number of office workers (including a large number of federal employees) commuting to downtown Cleveland as a result of Governor DeWine's Stay at Home Order effective March 24, 2020.

Service Area and Corridor Demographics: According to the 2017 ACS Survey, 23.4% of residents within METRO's service area identified as minority. In comparison, the minority population within ¹/₄ mile of stops adjacent to Route x60 is 46.1%.

The service area percentage of persons below the poverty level is 15.6%. The percentage of population below poverty level within $\frac{1}{4}$ mile of stops on the Route x60 is 36.1%.

Service Area and Route Rider Demographics: According to the 2020 METRO On-Board Survey, 56.1% of METRO's riders identified as minority. In comparison, 62.7% of riders on Route x60 identified as minority.

57.1% of METRO's total ridership identified having a household income level below the poverty rate. In comparison, 0.0% of riders on Route x60 identified having a household income level below the poverty rate.

A **Service Map** is attached showing the route alignment and impacted population. This map also indicates the census blocks groups classified as minority and low-income that are within a ¹/₄ mile of stops along this route.

An **Equity Analysis Chart** is attached which details route performance in February 2020, late March 2020 (after the Governor's Stay at Home Order went into effect on March 24, 2020) and October 2020. In summary, this route saw the following impacts from this change

Impacts of Service Changes:

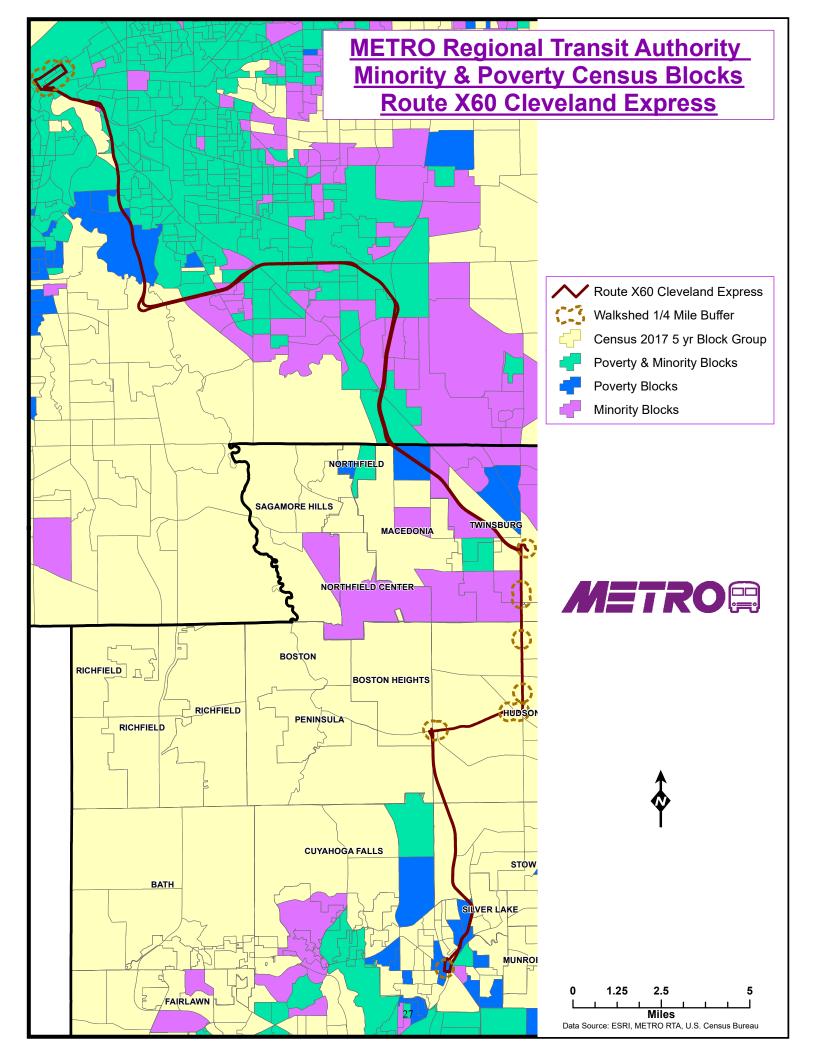
1. Temporarily suspended service on Route x60.

Assessment of Disparate Impact:

Because 62.7% of regular riders on this route identify as minority, the temporary suspension of this route does show a disparate impact to this community. However, considering that ridership dipped significantly in late March 2020 (to 1 person a day), it is likely that many previous riders are now working from home. When conditions change, METRO will do a more significant outreach to determine the right fit of service for the riders on this route.

Assessment of Disproportionate Burden:

After evaluation of the service adjustments for this route in comparison to the demographic information captured from the 2020 METRO On-Board Survey, this temporary change does not create a disproportionate burden on minority populations as defined in METRO's Disparate Impact/Disproportionate Burden Policy.



Equity Analysis METRO RTA Temporary Trip Reduction x61 Northcoast Express: Akron to Cleveland

Statement of Need: To reduce service on routes with low ridership, especially with commuter service that appealed to office workers in Downtown Cleveland many of whom are working from home during the COVID-19 Pandemic.

Winter 2020 Service Conditions (prior to COVID-19 service interruptions): The route provided service between downtown Akron (RKP Transit Center), Highland Square and the James Fisher Park and Ride to Downtown Cleveland and the VA Hospital.

Emergency Service Condition (implemented due to COVID-19): While the span of service remained similar to Winter 2020 schedules, the overall number of trips was reduced by half, resulting in a 50% decrease in weekly revenue miles, therefore qualifying as a major service change. This trip reduction was in response to many of our commuter riders transitioning to work-at-home situations. Though the number of non-emergency appointments were reduced at the Cleveland VA Hospital, METRO maintained the five of the six daily trips to the hospital to support worker and visitor needs.

A minor alignment change was also made along Market Street that did not significantly impact the overall route miles. Ridership on this segment of the route was particularly low and connections are maintained through service on the Route #1.

Travel destinations served downtown Akron, Fairlawn and Cleveland.

Ridership: In February 2020, the x61 had 247 average weekday passengers with a 14 hour span of service and 4,430 weekly revenue miles. In late March 2020 (the week before the initial service adjustments), average weekday ridership had dropped to 103 (a 58% reduction). This is likely connected to the reduced number of office workers (including a large number of federal employees) commuting to downtown Cleveland as a result of Governor DeWine's Stay at Home Order effective March 24, 2020.

Service Area and Corridor Demographics: According to data from the 2017 ACS survey, 23.4% of residents within METRO's service area identified as minority. In comparison, the minority population within ¹/₄ mile of stops on the Route x61 is 54.4%.

The service area percentage of persons below the poverty level is 15.6%. The percentage of population below the poverty level within ¹/₄ mile of stops on the Route x61 is 45.2%.

Service Area and Route Rider Demographics: According to the 2020 METRO On-Board Survey, 56.1% of METRO's riders identified as minority. In comparison, 57.6% of riders on Route x61 identified as minority.

57.1% of METRO's total ridership identified having a household income level below the poverty rate. In comparison, 23.7% of riders on Route x61 identified having a household income level below the poverty rate.

A **Service Map** is attached showing the route alignment and impacted population. This map also indicates the census blocks groups classified as minority and low-income that are within a ¹/₄ mile of stops along this route.

An **Equity Analysis Chart** is attached which details route performance in February 2020, late March 2020 (after the Governor's Stay at Home Order went into effect on March 24, 2020) and October 2020. In summary, this route saw the following impacts from this change:

Impacts of Service Changes:

1. Decreased number of daily trips servicing downtown Cleveland due to reduced demand resulting from many riders working from home.

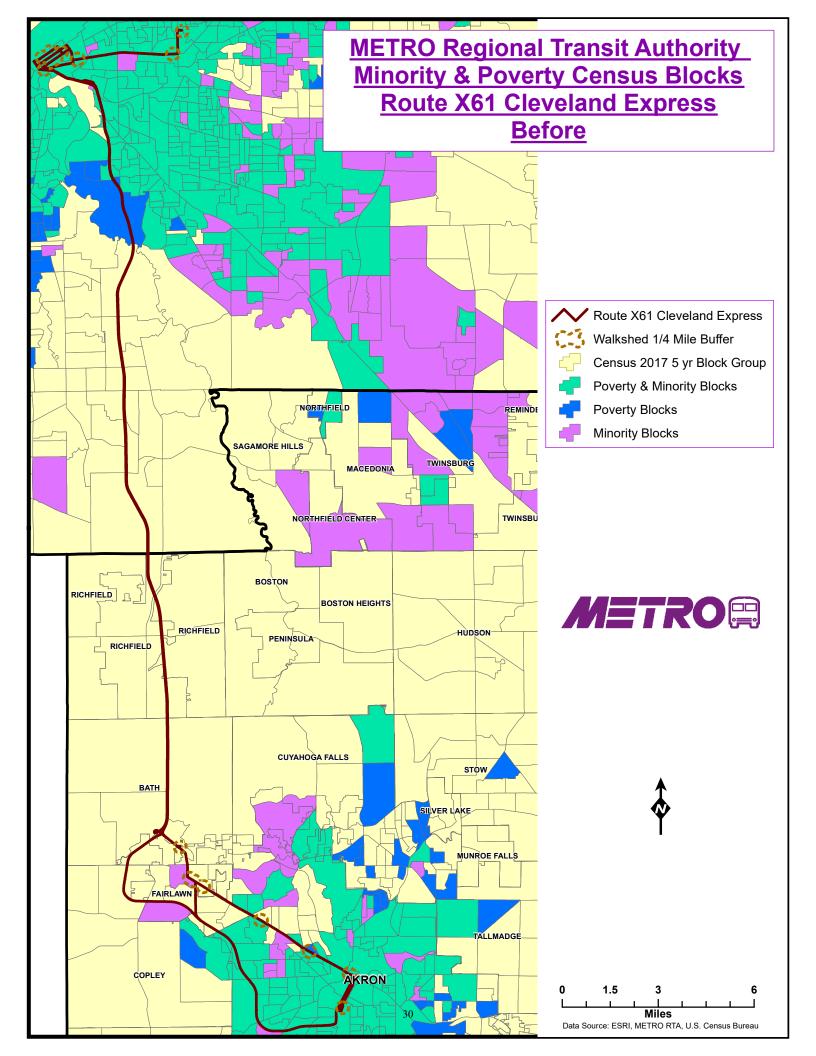
- 2. Ensured all trips serve both downtown Cleveland and extend to the VA.
- 3. Maintained vehicle loads between February 2020 and October 2020.

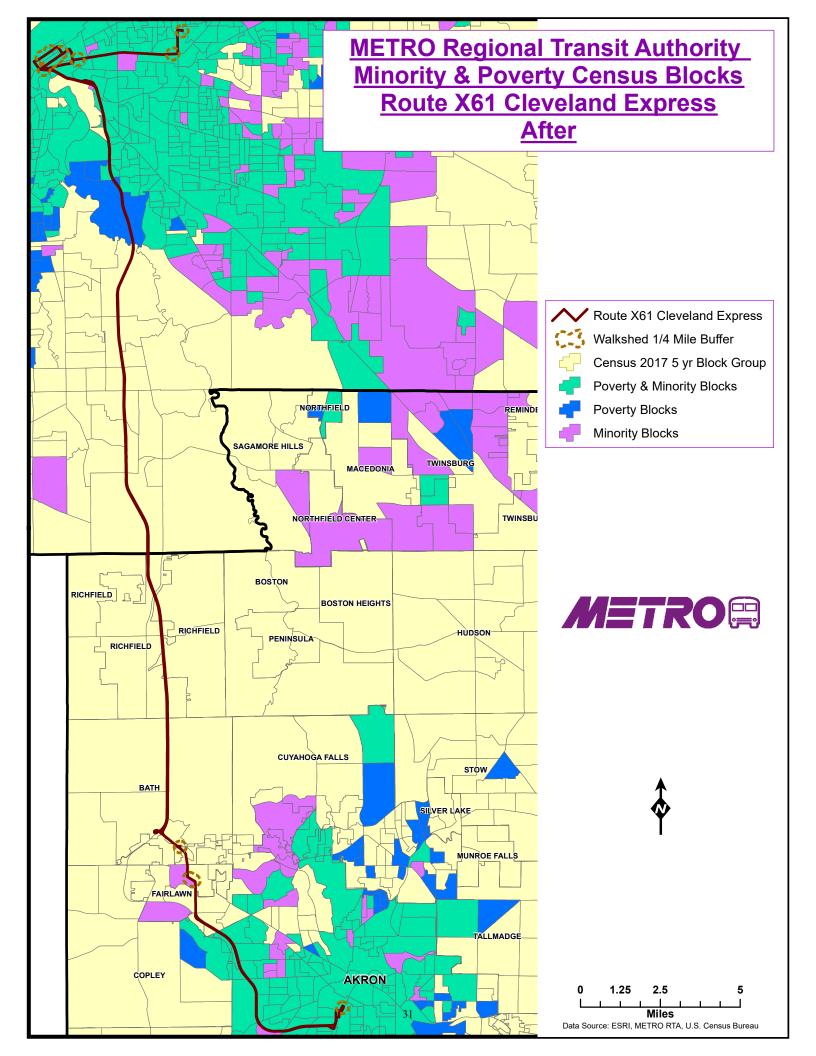
Assessment of Disparate Impact:

After evaluation of the service adjustments for this route in comparison to the demographic information captured from the 2020 METRO On-Board Survey, this change does not create a disparate impact on minority populations as defined in METRO's Disparate Impact/Disproportionate Burden Policy.

Assessment of Disproportionate Burden:

After evaluation of the service adjustments for this route in comparison to the demographic information captured from the 2020 METRO On-Board Survey this change does not create a disproportionate burden on minority populations as defined in METRO's Disparate Impact/Disproportionate Burden Policy.





Equity Analysis METRO RTA Temporary Trip Reduction #101: Richfield/Bath

Statement of Need: To adjust the number of trips serving routes with low ridership (particularly outside of typical work-related trips) to ensure adequate resources were available to maintain social distancing throughout the system.

Winter 2020 Service Conditions (prior to COVID-19 Service interruption): The route provided service between downtown Akron (RKP Transit Center) and the northwest section of the County, including work centers in Richfield and Bath.

Emergency Service Condition (implemented due to COVID-19): The alignment of the route was unchanged. Headways were decreased, resulting in a 25% decrease in weekly revenue miles, therefore qualifying as a major service change. When reducing the number of trips, consideration was given to the trips serving employment along the route.

Travel destinations served downtown Akron, Montrose, Bath and Richfield. Connections are also available to GCRTA Route 77F to Cleveland.

Ridership: In February 2020, the #101 had 58 average weekday passengers with a 18.45 span of service and 1,753.5 weekly revenue miles. In late March 2020 (the week before the initial service adjustments), average weekday ridership had dropped to 36 per day (a 38% reduction). This is likely connected to the reduced number of trips taken as a result of Governor DeWine's Stay at Home Order effective on March 24, 2020.

Service Area and Corridor Demographics: According to the 2017 ACS survey, 23.4% of residents within METRO's service area identified as minority. In comparison, the minority population within ¹/₄ mile of stops on Route #101 is 59.9%.

The service area percentage of persons below the poverty level is 15.6%. The percentage of the population below poverty level within ¹/₄ mile of stops on the Route #101 is 58.0%.

Service Area and Route Rider Demographics: According to the 2020 METRO On-Board Survey, 56.1% of METRO's riders identified as minority. In comparison, 26.2% of riders on Route #101 identified as minority.

57.1% of METRO's total ridership identified having a household income level below the poverty rate. In comparison, 73.8% of riders on Route #101 identified having a household income level below the poverty rate.

A **Service Map** is attached showing the route alignment impacted population. This map also indicates the census blocks groups classified as minority and low-income that are within a ¹/₄ mile of stops along this route.

An **Equity Analysis Chart** is attached which details route performance in February 2020, late March 2020 (after the Governor's Stay at Home Order went into effect on March 24, 2020) and October 2020. In summary, this route saw the following impacts from this change:

Summary of Service Changes:

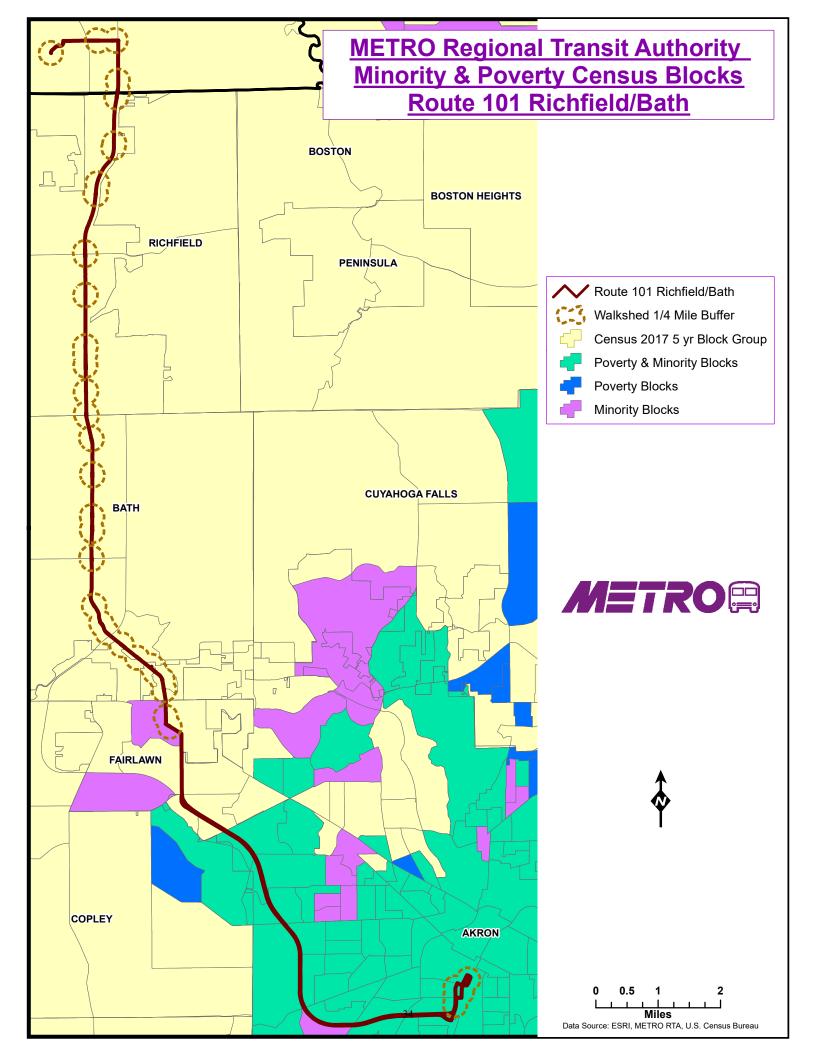
- 1. The service span is generally the same for this route, though fewer trips serving riders during non-peak work travel times.
- 2. Since April 2020, trips have been added and time adjustments have been made to accommodate essential trips (per customer feedback)
- 3. Service adjustments have ensured access for minority and poverty populations to growing employment opportunities in northwest Summit County.

Assessment of Disparate Impact:

After evaluation of the service adjustments for this route in comparison to the demographic information captured from the 2020 METRO On-Board Survey, this change does not create a disparate impact on minority populations as defined in METRO's Disparate Impact/Disproportionate Burden Policy.

Assessment of Disproportionate Burden:

After evaluation of the service adjustments for this route in comparison to the demographic information captured from the 2020 METRO On-Board Survey, this change does not create a disproportionate burden on minority populations as defined in METRO's Disparate Impact/Disproportionate Burden Policy.



Equity Analysis METRO RTA Temporary Trip Reduction #102: Northfield/MGM

Statement of Need: To adjust the number of trips serving routes with low ridership (particularly outside of typical work-related trips) to ensure adequate resources were available to maintain social distancing throughout the system.

Winter 2020 Service Conditions (prior to COVID-19 Service interruption): The route provided service between downtown Akron (RKP Transit Center) and the northeast section of the County, including work centers in Twinsburg, Macedonia and Northfield.

Emergency Service Condition (implemented due to COVID-19): The alignment of the route was unchanged. Headways were decreased, resulting in a 52% decrease in weekly revenue miles, therefore qualifying as a major service change.

Travel destinations served downtown Akron, Twinsburg, Macedonia and Northfield.

Ridership: In February 2020, the #102 had 205 passengers with an 18.5 hour span of service and 4,761.50 weekly revenue miles. In late March 2020 (prior to the initial service), average weekday ridership had dropped to 95 (a 54% reduction). This is likely connected to the reduced number of workers travelling between Akron and northeast Summit County, as well as the temporary closure of the Northfield/MGM Casino as a result of Governor DeWine's Stay at Home Order effective on March 24, 2020.

Service Area and Corridor Demographics: According to the 2017 ACS survey, 23.4% of residents within METRO's service area identified as minority. In comparison, the minority population within ¹/₄ mile of stops on Route #102 is 45.2%.

The service area percentage of persons below the poverty level is 15.6%. The percentage of the population below poverty level within ¹/₄ mile of stops on the Route #102 is 47.9%.

Service Area and Route Rider Demographics: According to the 2020 METRO On-Board Survey, 56.1% of METRO's riders identified as minority. In comparison, 59.4% of riders on Route #102 identified as minority.

57.1% of METRO's total ridership identified having a household income level below the poverty rate. In comparison, 52.4% of riders on Route #101 identified having a household income level below the poverty rate.

A **Service Map** is attached showing the route alignment and impacted population. This map also indicates the census blocks groups classified as minority and low-income that are within a ¹/₄ mile of stops along this route.

An **Equity Analysis Chart** is attached which details route performance in February 2020, late March 2020 (after the Governor's Stay at Home Order went into effect on March 24, 2020) and October 2020. In summary, this route saw the following impacts from this change:

Summary of Service Changes:

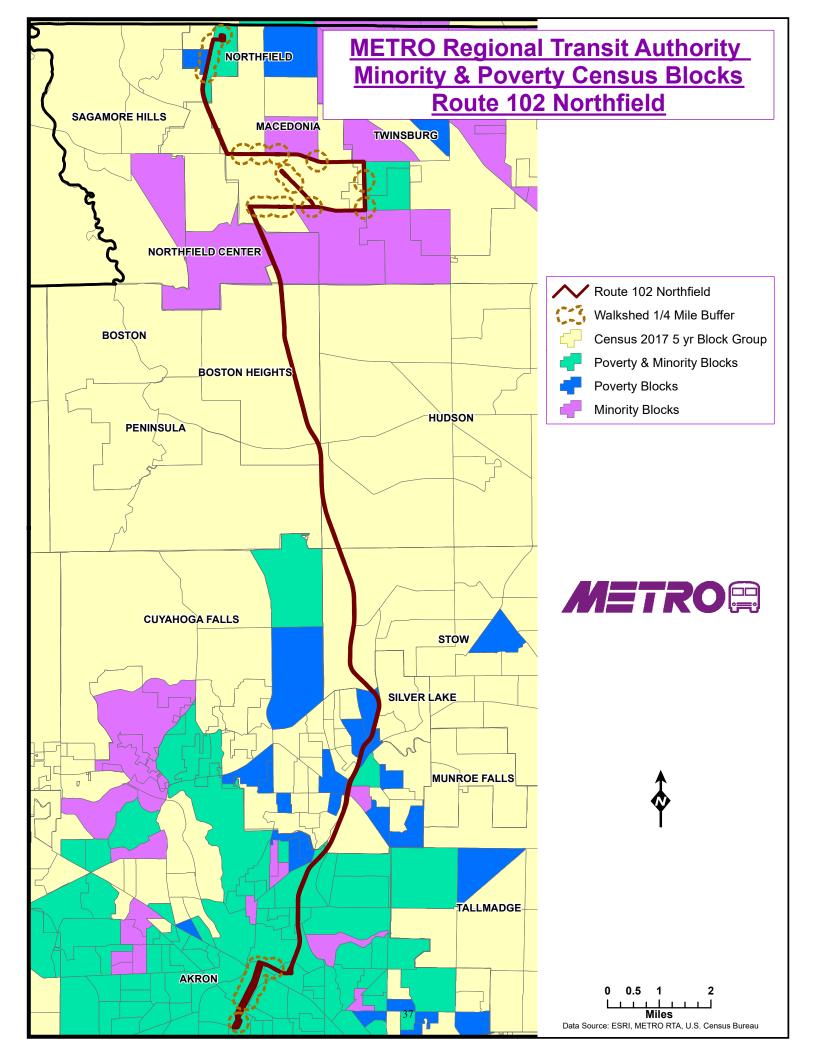
- 1. The service span is generally the same for this route, though fewer trips serving riders during non-peak work travel times.
- 2. Since April 2020, trips have been added and time adjustments have been made to accommodate essential trips (per customer feedback)
- 3. Service adjustments have ensured access for minority and poverty populations to growing employment opportunities in northeast Summit County.

Assessment of Disparate Impact:

After evaluation of the service adjustments for this route in comparison to the demographic information captured from the 2020 METRO On-Board Survey, this change does not create a disparate impact on minority populations as defined in METRO's Disparate Impact/Disproportionate Burden Policy.

Assessment of Disproportionate Burden:

After evaluation of the service adjustments for this route in comparison to the demographic information captured from the 2020 METRO On-Board Survey, this change does not create a disproportionate burden on minority populations as defined in METRO's Disparate Impact/Disproportionate Burden Policy.



Equity Analysis METRO RTA Temporary Trip Reduction #104: Twinsburg, Creekside Park and Ride

Statement of Need: To adjust the number of trips serving routes with low ridership (particularly outside of typical work-related trips) to ensure adequate resources were available to maintain social distancing throughout the system.

Winter 2020 Service Conditions (prior to COVID-19 Service interruption): The route provided service between downtown Akron (RKP Transit Center) and the northeast section of the County, including Hudson, Twinsburg and the Creekside Park and Ride.

Emergency Service Condition (implemented due to COVID-19): The alignment of the route was unchanged. Headways were decreased, resulting in a 46% decrease in weekly revenue miles, therefore qualifying as a major service change. When reducing the number of trips, consideration was given to the trips serving employment along the route.

Travel destinations served downtown Akron, Hudson and Twinsburg.

Ridership: In February 2020, the #104 had 143 passengers on an average weekday with an 18.5 hour span of service and 3,498.5 weekly revenue miles. In late March 2020 (the week before the initial service adjustments), average weekday ridership had dropped to 103 (a 28% reduction). This is likely connected to the reduced number of trips taken as a result of Governor DeWine's Stay at Home Order effective March 24, 2020.

Service Area and Corridor Demographics: According to the 2017 ACS survey, 23.4% of residents within METRO's service area identified as minority. In comparison, the minority population within ¹/₄ mile of stops on Route #104 is 45.4%.

The service area percentage of persons below the poverty level is 15.6%. The percentage of the population below poverty level within ¹/₄ mile of stops on the Route #104 is 51.8%.

Service Area and Route Rider Demographics: According to the 2020 METRO On-Board Survey, 56.1% of METRO's riders identified as minority. In comparison, 67.9% of riders on Route #104 identified as minority.

57.1% of METRO's total ridership identified having a household income level below the poverty rate. In comparison, 35.9% of riders on Route #104 identified having a household income level below the poverty rate.

A **Service Map** is attached showing the route alignment and impacted population. This map also indicates the census blocks groups classified as minority and low-income that are within a ¹/₄ mile of stops along this route.

An **Equity Analysis Chart** is attached which details route performance in February 2020, late March 2020 (after the Governor's Stay at Home Order went into effect on March 24, 2020) and October 2020. In summary, this route saw the following impacts from this change:

Summary of Service Changes:

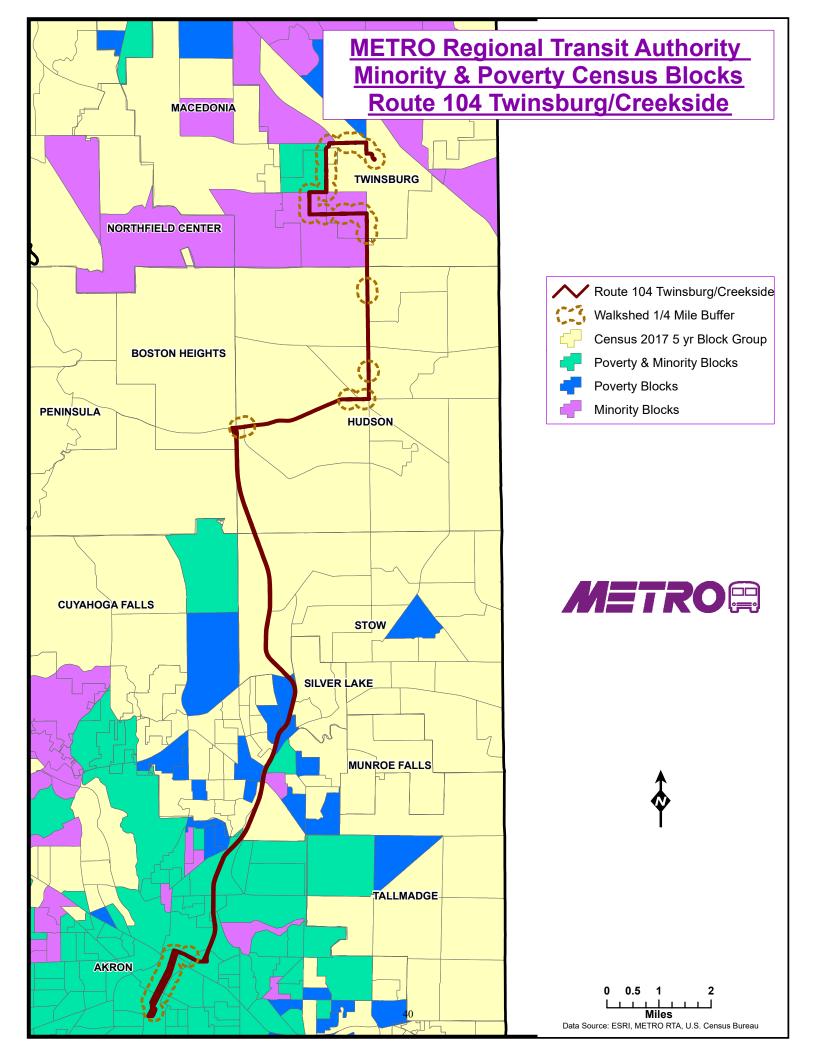
- 1. The service span is generally the same for this route, though fewer trips serving riders during non-peak work travel times.
- 2. Since April 2020, trips have been added and time adjustments have been made to accommodate essential trips (per customer feedback)
- 3. Service adjustments have ensured access for minority and poverty populations to growing employment opportunities in northeast Summit County.

Assessment of Disparate Impact:

After evaluation of the service adjustments for this route in comparison to the demographic information captured from the 2020 METRO On-Board Survey, this change does not create a disparate impact on minority populations as defined in METRO's Disparate Impact/Disproportionate Burden Policy.

Assessment of Disproportionate Burden:

After evaluation of the service adjustments for this route in comparison to the demographic information captured from the 2020 METRO On-Board Survey, this change does not create a disproportionate burden on minority populations as defined in METRO's Disparate Impact/Disproportionate Burden Policy.



Equity Analysis METRO RTA Temporary Route Suspension Grocery Routes

Statement of Need: Temporary suspension of service on the Grocery Routes due to safety concerns for vulnerable population and route productivity.

Winter 2020 Service Conditions (prior to COVID-19 service interruptions): These routes provided fixed route service between senior apartment buildings and select grocery stores within the METRO service area. Each day of the week serviced different buildings and stores.

Emergency Service Condition (implemented due to COVID-19): These routes have been temporarily suspended due to safety concerns and route productivity. In most cases, Grocery Routes were operated using a smaller vehicle. With the capacity limitations due to social distancing, and serving mainly senior riders, safety concerns required suspension of this service. As noted later in this evaluation, alternative services were available for all Grocery bus stops.

Travel destinations served: Apartment buildings and select grocery stores throughout the METRO service area.

Ridership: In February 2020, Grocery Routes had a combined 80 passengers on an average weekday with 628.2 weekly revenue miles. Span of service ranged from 10.6 hours to 16.4 hours, depending on the day of the week. In late March 2020 (the week before the initial service adjustments), average weekday ridership dropped to 43 passengers (a 43% reduction). This is likely connected to the reduced number of trips taken as a result of Governor DeWine's Stay at Home Order effective on March 24, 2020.

Service Area and Corridor Demographics: According to the 2017 ACS survey, 23.4% of residents within METRO's service area identified as minority. In comparison, the minority population within ¹/₄ mile of stops on Grocery Routes is 55.8%.

The service area percentage of persons below the poverty level is 15.6%. The percentage of the population below the poverty level within ¹/₄ mile of stops served by Grocery Routes is 30.5%.

Service Area and Route Rider Demographics: 2020 METRO On-Board Survey (OBS) information is not available for the Grocery Routes.

A **Service Map** is attached showing the route alignment impacted population. This map also indicates the census blocks groups classified as minority and low-income that are within a ¹/₄ mile of stops along this route.

An **Equity Analysis Chart** is attached which details route performance in February 2020, late March 2020 (after the Governor's Stay at Home Order went into effect on March 24, 2020) and October 2020. In summary, this route saw the following impacts from this change:

Impacts of Service Changes:

1. Temporarily suspended regular service Grocery Routes.

Assessment of Disparate Impact:

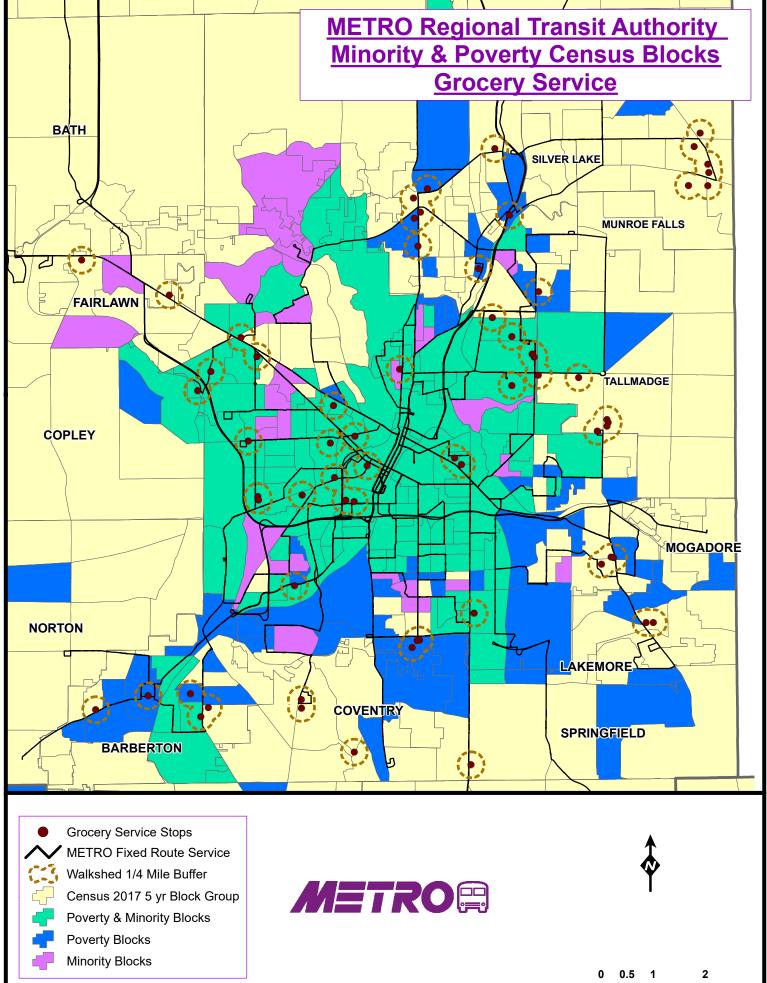
After evaluation of the service adjustments for this route in comparison to the demographic information from the 2017 5-yr ACS Census data, this change does not create a disparate impact on minority populations as defined in METRO's Disparate Impact/Disproportionate Burden Policy.

While no disparate impact was found, it should be noted that 65 of the 66 stops served by the Grocery Routes are within a ¹/₄ mile of another fixed route service or within the METRO Connect service area, providing Grocery bus riders with another option for their trip. Grocery bus fare was \$0.50, as is the reduced senior fare on fixed route. Additionally, for those riders who are unable to get to another fixed route bus stop, multiple demand response services are available including complementary ADA service (if eligible) or SCAT Senior service for anyone over the age 62.

Assessment of Disproportionate Burden:

After evaluation of the service adjustments for this route in comparison to the demographic information captured from the 2017 5-yr ACS Census data, this change does not create a disproportionate burden on minority populations as defined in METRO's Disparate Impact/Disproportionate Burden Policy.

While no disproportionate burden was found, it should be noted that 65 of the 66 stops served by the Grocery Routes are within a ¹/₄ mile of another fixed route service or within the METRO Connect service area, providing Grocery bus riders with another option for their trip. Grocery bus fare was \$0.50, as is the reduced senior fare on fixed route. Additionally, for those riders who are unable to get to another fixed route bus stop, multiple demand response services are available including complementary ADA service (if eligible) or SCAT Senior service for anyone over the age 62.



Miles Data Source: ESRI, METRO RTA, U.S. Census Bureau tta ent

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Public Comments

As a part of the equity analysis for METRO's COVID-19 Contingency service, the public was provided information about the Title VI review, was informed about the public hearing on February 15, 2021 and was given ample opportunity to provide feedback about the adjusted service. As outlined in our Public Participation Policy (adopted by Resolution 1994-34), we advertised the public meeting in both the <u>Akron Beacon Journal</u> and <u>The Reporter</u> newspaper on January 14, 2021. We additionally advertised onboard our buses, at the Robert K Pfaff Transit Center and on our website and social media outlets between January 14, 2021 and February 15, 2021.

As a part of the advertisement process, we summarized the general nature of service adjustments that were determined to be "major service changes" per METRO policy. We asked for all feedback to be received prior to February 15, 2021 at 2:00 pm to be considered part of the public record. Prior to the public hearing, feedback could be provided by the following methods:

- (1) A telephone message line;
- (2) An electronic form on our website;
- (3) A paper form at the Customer Care window at the Robert K Pfaff Transit Center; or
- (4) A mailed submittal to the METRO administrative offices.

The customer feedback received as part of this process is presented below, and these responses were posted to METRO's website at the conclusion of the public comment period. Several of the comments are items that will be addressed with our Spring 2021 service change. Many of the others are requests that will be considered as regional travel patterns return to 'normal' and as we go through the process of the upcoming Comprehensive Operational Analysis.

Route Number	Direction	Time of Day	Customer Comment	Source	METRO Response
50			What is the alternative for this bus route? Will you restore this route?	Online Form	The extension of Route 1 on trips departing RKP Transit Center at the top of every hour provides coverage for bus stops serving 93% of Route 50 riders. Please see our website for the current Route 1 schedule.
51	Outbound	Afternoon	Please bring this bus back getting to work has become expensive without the bus	Online Form	Alternative service is available using the METRO Connect demand response program. Please call (330) 376-5353 to schedule a trip and ride for the same fare as any fixed route.
1			Left email address on phone line for updates about the 1	Message Line	Route 1 will continue to run as currently operating. No additional changes are proposed.
10	Outbound		I would just like to see this bus run more often but am satisfied as long as you are keeping folks safe	Online Form	Additional trips beyond the trips added to accommodate social distancing are not planned at this time. As we study additional route adjustments, we will consider where we can continue to improve frequency.
19	Inbound	10pm	Routes need to have the latest buses added back in Also expand SUNDAY services!	Online Form	Thank you for this feedback; though not related directly to this particular outreach, we will be adding later weekday service on Route 19 in Spring 2021.
x61	Outbound	9:00	I occasionally the 9:00 bus CSU 3 x a week, since it was eliminated I now have to drive. It has been a hardship since the early bus is at 6 something it is too early.	Online Form	We appreciate this feedback and will consider this service as we are able to add more trips back to our schedule.
102	Inbound	6:15 pm	I got stranded in Northfield one day because the bus ends at MGM and does not return to transit center. The has to be a later bus leaving this area for those who work past 4:54 pm. Please consider this	Online Form	Thank you for this information. We will look into adding a return trip for our Spring 2021 Service.
Grocery			My fellow seniors are having a difficult hardship with this. Please explore running a bus every other week from senior housing apartments. Meals on wheels is not the solution.	Online Form	We are working on ways to ensure our seniors are aware of the other great service that is still available to them on our fixed route service - at the same cost as the grocery routes. Those who qualify for specialized ADA transportation or our SCAT program can connect with our customer care line to schedule a trip on our demand response service.

Route Number	Direction	Time of Day	Customer Comment	Source	METRO Response
Grocery		Stow Kent Gardens	The loss of the grocery bus has really been difficult for the seniors and disabled in the building. I realize they can get one ride to the grocery store each week but they have also lost all rides to the bank or other errands. Many don't have family or friends to help	Online Form	We are working on ways to ensure our seniors are aware of the other great service that is still available to them on our fixed route service - at the same cost as the grocery routes. Those who qualify for specialized ADA transportation or our SCAT program can connect with our customer care line to schedule a trip on our demand response service.
10	Outbound	7:00 AM	ALL OF THE DRIVERS ARE WONDERFUL. ALWAYS ON TIME	Online Form	Thank you, we appreciate this feedback.
X61			Rides the 61; appreciates that it is continuing during the pandemic; would like to have more trips back as soon as is possible and an option to drop off at 9th Street vs. 6th Street	Message Line	We appreciate this feedback and will consider this service as we are able to add more trips back to our schedule.
All			She would like more service on all routes (particularly the route 30)	Message Line	We appreciate this feedback and will consider this service as we are able to add more trips back to our schedule.
x61			Would like to ensure service continues and additional trips added for commuters when telecommuting is no longer an option'	Message Line	We appreciate this feedback and will consider this service as we are able to add more trips back to our schedule.
54 (DASH)	Inbound	12:30pm	Excellent Service	Online Form	Thank you, we appreciate this feedback.
x61	Outbound	6:60 am	Appreciate our Operators, they care for each of the riders, thank you! This is for both ways. Inbound and outbound!	Online Form	Thank you, we appreciate this feedback.
x60		7:12AM northbound and 4:50 southbound	When will the route be restarted?	Online Form	We will examine the need to provide trips when regular commuting patterns return. We will ensure that we reach out as we are evaluating next steps!
54 (DASH)	Outbound	9am	You provide an excellent service for non Akronites coming into the city	Online Form	Thank you, we appreciate this feedback.

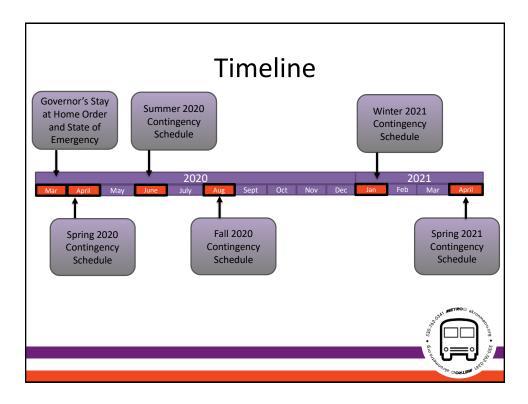
Route Number	Direction	Time of Day	Customer Comment	Source	METRO Response
1	Outbound		When the #1 service came to Montrose West many of the hassles with connections to inbound service eased. The one problem is the destination signs for the buses coming to the Montrose West area. When the service first started all destination read Montrose. After a month the destination signs Summit Mall which the #1 hasn't served in a couple of years. The signs then migrated to Hollythorn on most but not all. Recently all buses are now using the Montrose signs again. Why can't the buses coming to Montrose West have the correct signs	Online Form	Thanks for the feedback - we'll take a look at this issue.
101	Inbound	11:35pm	Please resume service for the 11:35pm - Route 101 Inbound from Katherine Blvd.	Online Form	We will take a look at options for this service.
1			Need more chaser buses	Online Form	We are monitoring ridership and will continue to add buses as needed for social distancing.
10			Need more chaser buses	Online Form	We are monitoring ridership and will continue to add buses as needed for social distancing.
1			Wanted to follow up on any changes to the Route 1	Online Form	The Route 1 will stay at current service levels.
All			When will we be done with Contingency service	Public Hearing	We will look at the opportunity to adjust service when travel patterns resume to more-normal levels. In the meantime, we will continue to adjust service with each service change to ensure essential trip connections are being made to the best of our ability.

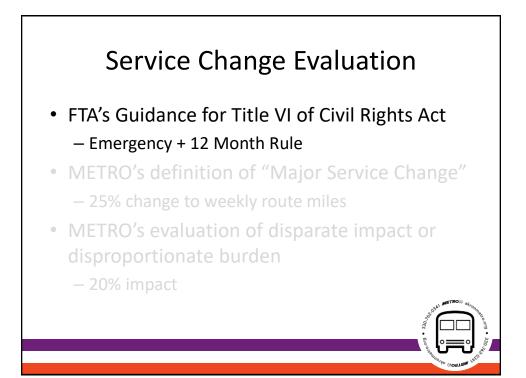
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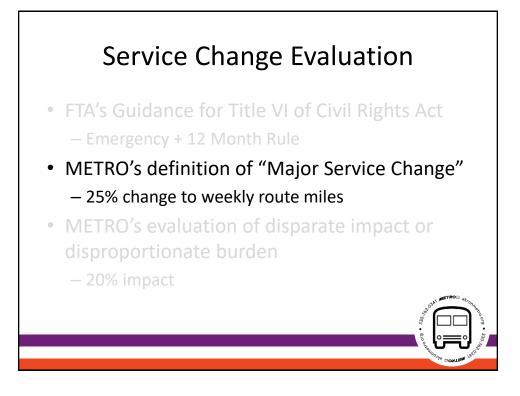
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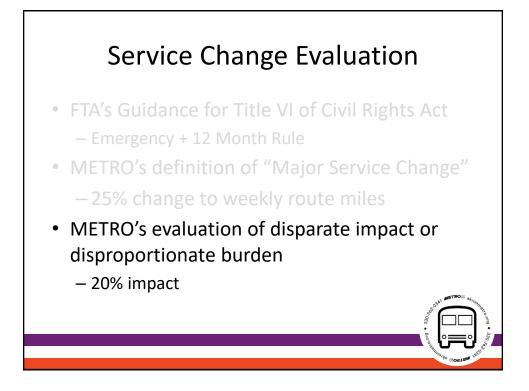
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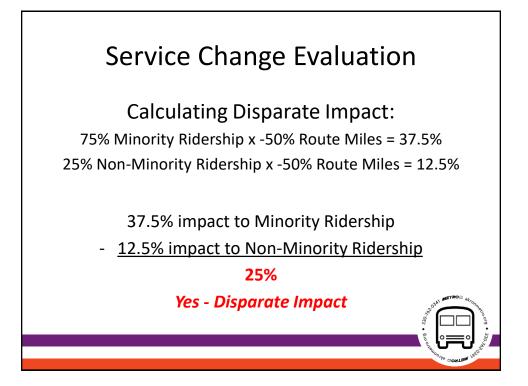


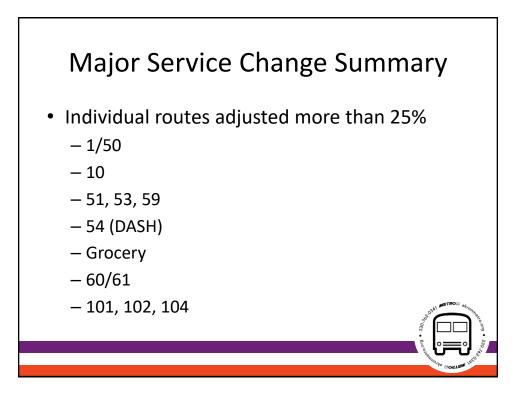


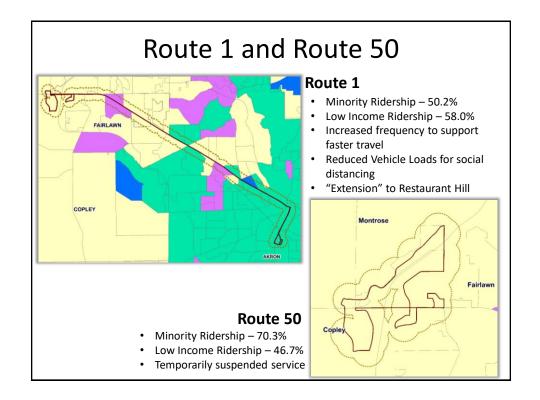


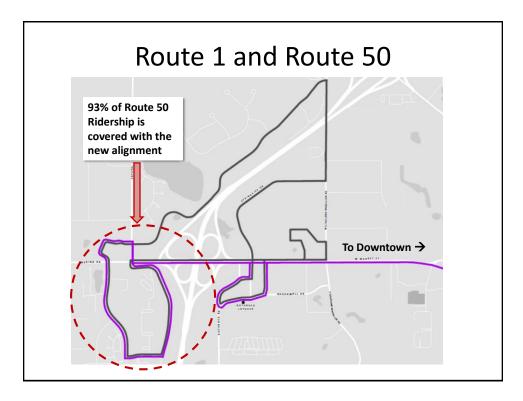


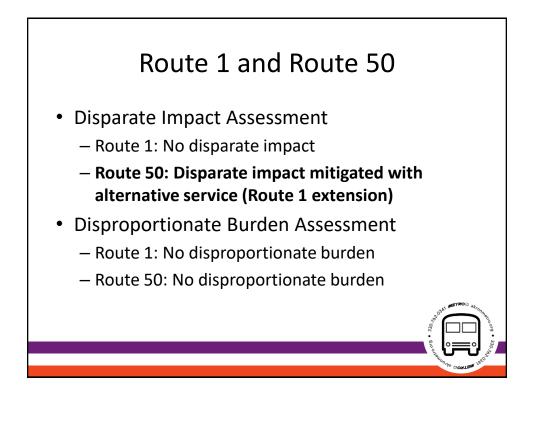


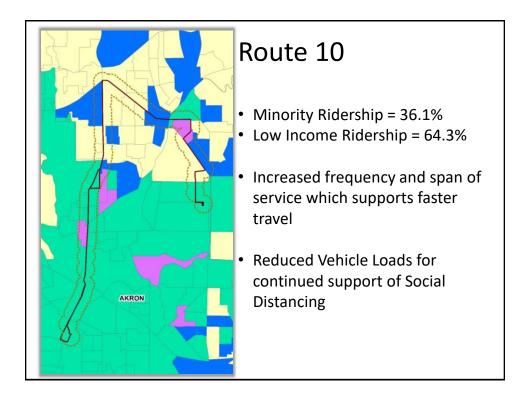


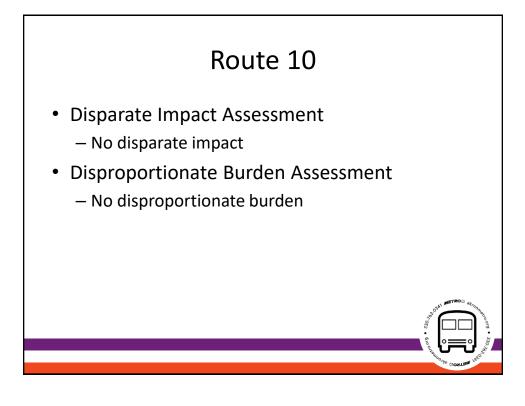


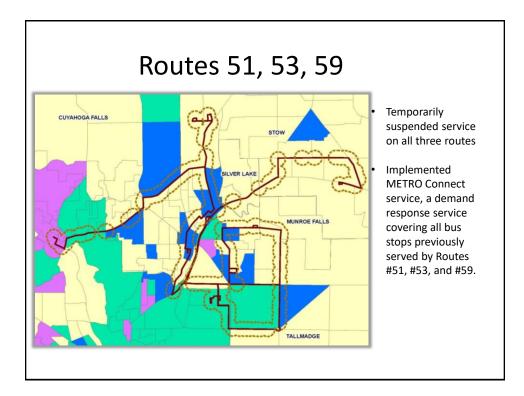


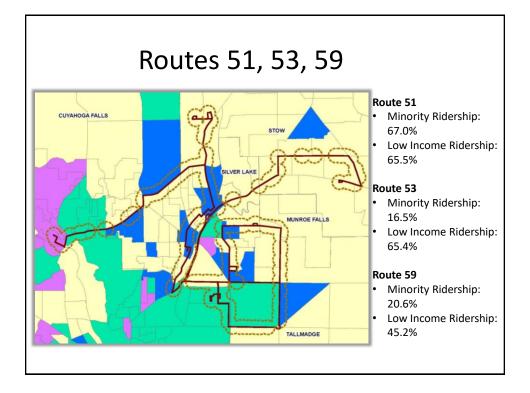


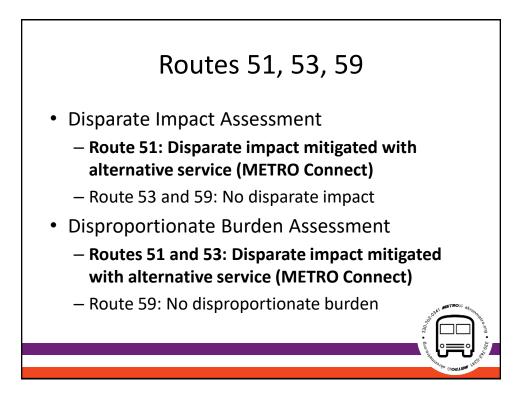


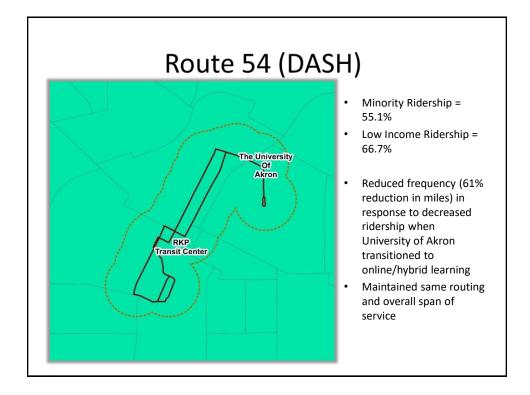


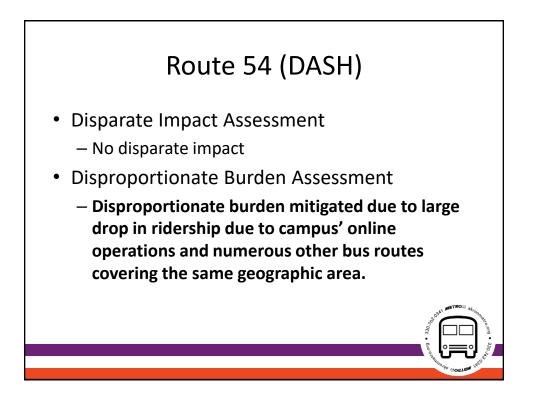


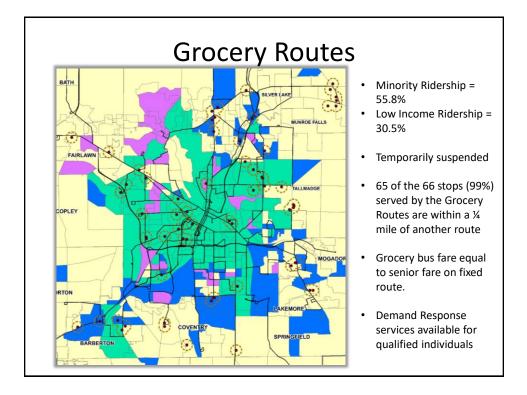




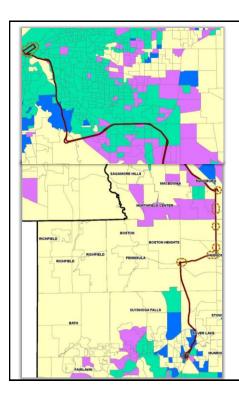






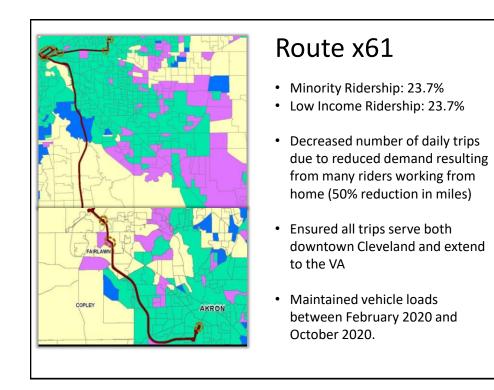


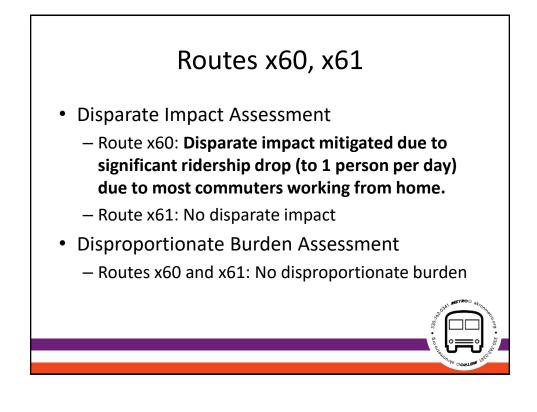
Grocery Routes • Disparate Impact Assessment – No disparate impact • Disproportionate Burden Assessment – No disproportionate burden

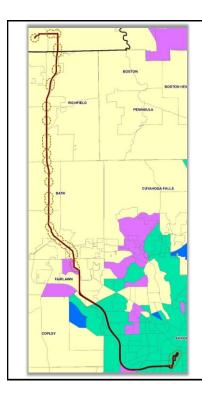


Route x60

- Minority Ridership: 62.7%
- Low Income Ridership: 0%
- Temporarily suspended due to extremely low ridership

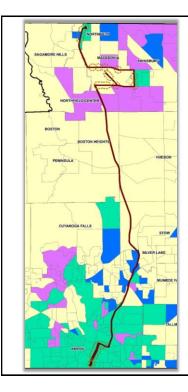






Route 101

- Minority Ridership: 26.2%
- Low Income Ridership: 73.8%
- Slight reduction in number of trips (25% reduction in miles)
- Minor time adjustments were made in summer 2020 to support work connections as requested by customers



Route 102

- Minority Ridership: 59.4%
- Low Income Ridership: 52.4%
- Trip reductions were mostly during mid day hours (52% reduction in miles)
- Since April 2020, several trips have been added and time adjustments have been made to support essential and work-related trips (per customer feedback)
- Service adjustments have ensured access for minority and poverty populations to growing employment opportunities in northeastern Summit County.



Route 104

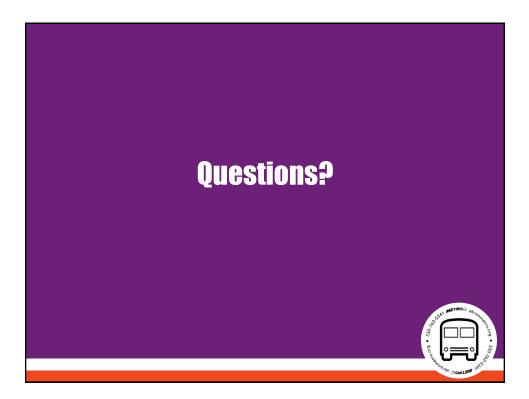
- Minority Ridership: 67.9%
- Low Income Ridership: 35.9%
- Trip adjustments have been mostly contained to non-peak service hours (46% total reduction in miles)
- For the Fall 2020 service change, times were adjusted and additional trips added per customer feedback
- Service adjustments have ensured access for minority and poverty populations to growing employment opportunities in northeastern Summit County

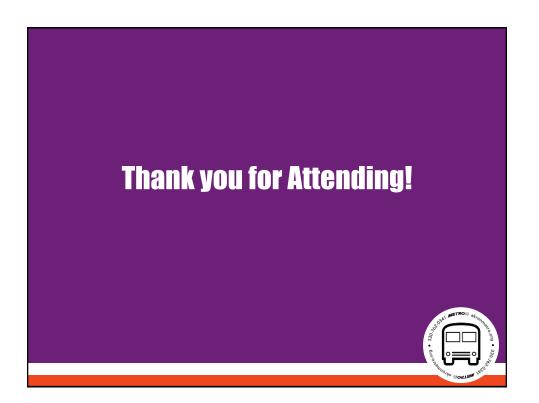
Routes 101, 102, 104

- Disparate Impact Assessment
 - Routes 101, 102,104: No disparate impact
- Disproportionate Burden Assessment
 Routes 101, 102, 104: No disproportionate burden









Public Hearing Transcript Title VI Analysis of COVID-19 Service Changes February 15th, 2021 - 11:00am Presenter – Valerie Shea, Directors of Planning and Strategic Development

Good morning and welcome everyone. My name is Valerie Shea and I'm the Director of Planning and Strategic Development for METRO RTA.

Today, we are here to discuss the service changes that we have made since the onset of the COVID-19 pandemic in early 2020.

Before we begin, I'd like to encourage any attendees to use the Q&A feature at the bottom of your screen to submit questions and comments throughout the presentation. We'll address any questions or comments received at the end of the presentation.

In case anyone needs a reminder of the past year...

- In March, the Governor declared a State of Emergency and issued a Stay at Home Order due to COVID-19. At this time, trips were to be limited to those that were considered essential.
- In April, it became necessary to adjust our service in order to promote social distancing and accommodate METRO's temporarily reduced workforce during this time of unprecedented health, family and personal needs.
- In June, we adjusted service again, this time more holistically, to allow for more trips on our higher ridership routes and to target additional service that served those essential trips and work connections.
- In August and January, we further refined those schedules, adding trips and modifying service based on customer feedback again focused on essential trip connections.

In a pre-COVID world, when we make service changes, we are planning them in advance and going through this public involvement process before the changes are implemented. However, due to the nature of the pandemic, there was a need for immediate action to accommodate social distancing and ensure safety.

All of the analysis and outreach for service changes follows the Federal Transit Administration's Title VI guidance. The guidance does acknowledge, however, that occasionally, changes need to be made quickly as the result of an emergency, such as COVID-19. If these changes are going to be in place longer than 12 months, then the full analysis and outreach process must be followed.

We are nearing that 12-month mark for these service changes, and are still very much in the midst of the pandemic. At this time, we plan to continue the service changes we have in place and adapt as our world continues to change.

That being said, we are here today to go over the results of the Title VI analysis for all of those changes made over the last year that qualify as a major service change, and to get your feedback.

So what exactly qualifies as a major service change? Based on METRO's definition, a major service change is any change that impacts over 25% of a route's weekly route mileage.

Once we've determined that there is a major service change to a particular route, we need to ensure that it does not adversely affect a minority or low-income population twenty percent (20%) more or less than non-minority or non-low income populations. This level of impact will be considered a disparate impact on minority populations, or a disproportionate burden on low income populations.

So how is this impact calculated? Let's say we have a route on which, according to our most recent onboard survey, 75% of riders identify as a minority (and 25% as non-minority). For this particular example, let's say we are reducing the route miles by 50%.

The impact to a minority rider is, as shown on the screen, 37.5% and 12.5% for a non-minority rider. Subtracting the two, a minority rider would be adversely impacted 25% more than a non-minority rider. Since 25% is larger than the 20% threshold, this is considered a disparate impact and we would have to consider alternate service to mitigate this impact or reconsider the service change.

The same process is done to determine if there is a disproportionate burden to low income riders.

So now we will move into the specific changes that were made as a result of the pandemic and walk through this process of identifying which ones qualify as a major service change, and then evaluating those changes for adverse impact to minority and low income populations.

On this slide, you'll see the list of routes that hit the 25% threshold for route miles and are considered a major service change.

- 1/50
- 10
- 51, 53, 59
- 54 (DASH)
- Grocery
- 60/61
- 101, 102, 104

Now, we will walk through these routes (or groups of routes) one at a time to describe the changes that were made, show the results of the impact analysis and describe any alternative service being provided.

Beginning with Routes 1 and 50. Route 50 (the Montrose circulator) has been temporarily suspended. On Route 1 (West Market St), frequency was increased to support faster travel and reduce vehicle loads to allow for social distancing. Additionally, an extension of Route 1 has been added to cover the "restaurant hill" area previously served by Route 50.

This extension, shown here in the circled area of the map in purple, covers the bus stops where 93% of previous Route 50 riders boarded the bus. The Route 50 alignment is shown in gray.

After analysis based on the recent On-Board survey, it was determined that Route 1 saw neither a disparate impact nor disproportionate burden.

The suspension of Route 50 without the extension of Route 1 would have caused a disparate impact on minority populations. However, to mitigate this impact METRO extended Route 1 to provide service to

bus stops accounting for 93% of the Route 50 ridership, eliminating the disparate impact. No disproportionate burden was found for Route 50.

Route 10 is a fixed route service serving North Main St into Cuyahoga Falls from Downtown Akron. Frequency and span was increased to support faster travel and reduce vehicle loads to allow for social distancing. So here, the major service change was actually an increase in service.

After analysis based on the recent On-Board survey, it was determined that Route 10 saw neither a disparate impact nor disproportionate burden for minority or low income riders.

Route 51, 53 and 59 were neighborhood circulator routes serving Cuyahoga Falls, Stow and Tallmadge. These routes have been suspended due to low ridership, however an alternative service has been provided. METRO Connect now provides Demand Response Service between stops previously served by any of these three routes. This service is offered at the same fare as fixed route service and can potentially improve route directness by providing the ability to have a stop-to-stop service on trips that previously would have required a transfer between two of the circulators. Since this can actually improve route directness and save time and covers the entire geographic area previously served, this is considered to be an effective alternative service.

The minority and low income ridership on each route is shown here.

After analysis based on the recent On-Board survey, it was determined that Routes 53 and 59 did not have a disparate impact on minority populations. Route 51 would have been considered a disparate impact if the METRO Connect service alternative was not provided to mitigate it.

Similarly, Routes 51 and 53 would have had a disproportionate burden on low income populations if METRO Connect was not provided as an alternative. Route 59 saw no disproportionate burden.

The DASH downtown circulator is operating at reduced frequency to respond to decreased ridership mostly due to the University of Akron transitioning to online learning or hybrid learning. The same span of service and route alignment was maintained.

After analysis based on the recent On-Board survey, it was determined that the DASH does not have a disparate impact on minority riders.

The ridership on this route is more likely to be low income, and upon analysis, there is a disproportionate burden on low income riders. This is likely due to the mainly student status of the riders on this route. Demand for the route, however, dropped significantly when the University went to virtual learning and remained low when the hybrid learning option was in place. Because service is still being continued at a lower frequency and many additional routes serve this area in our downtown core, riders do have alternatives to provide more-frequent service within this corridor. No further mitigation measures are necessary at this time, and it is anticipated that frequency increase on this route when demand for service increases.

Next are the Grocery Routes. These routes provided fixed route service between senior apartment buildings and select grocery stores within the METRO service area. These routes have been temporarily suspended due to safety concerns and route productivity. In most cases, Grocery Routes were operated using a smaller vehicle. With the capacity limitations due to social distancing, and serving mainly senior riders, safety concerns required suspension of this service.

Alternative service is available via multiple options. 65 of the 66 stops served by Grocery Bus are within ¼ mile of another fixed route bus stop, as you'll see on the map. Grocery fare and fixed route fare are equivalent for senior riders. Demand response services are also available to those 62 and older or persons with disabilities that prevent them from being able to use our fixed route services.

After analysis based on the recent On-Board survey, it was determined that the Grocery Bus saw neither a disparate impact nor disproportionate burden for minority or low income riders.

Route x60 and x61 are our Northcoast Express commuter routes that connect Summit County to downtown Cleveland and the VA hospital. Both routes saw large ridership reductions due to many commuters working from home during the pandemic.

Service on the x60 was suspended entirely due to extreme ridership decreases (down to 1 person per day) after the Stay at Home Order was put in place.

Service on the x61 was reduced due to reduced ridership, however all trips that remain continue to serve both downtown Cleveland and the VA. The VA is still served by the same number of trips as it was pre-pandemic.

After analysis based on the recent On-Board survey, it was determined that Route x61 saw neither a disparate impact nor disproportionate burden.

The suspension of Route x60 was found to have a disparate impact based on the riders using the route pre-pandemic. However, since ridership dropped so significantly (to 1 person per day), this impact is dissipated. No further mitigation measures are necessary at this time, and it is anticipated that frequency increase on this route when demand for service increases. No disproportionate burden was found for Route x60.

The next group of routes we'll discuss are the 101, 102 and 104. These are some of our routes connecting downtown Akron to suburban job hubs in northern Summit County. Ridership on these routes is relatively low compared to other services, however we wanted to ensure we maintained job access for those essential workers. Remaining trips are targeted to serve the shift times of the employment centers. Adjustments have been made to trip times based on customer feedback to ensure this is maintained.

After analysis based on the recent On-Board survey, it was determined that Routes 101, 102 and 104 saw neither a disparate impact nor disproportionate burden on minority or low income populations.

That concludes the summary of the major service changes that have been made over the past year in response to COVID-19. As we discussed at the top of the presentation, we are still very much in the midst of the pandemic and plan to continue these changes for the time being and continue to adapt as our environment continues to change. The intent of the changes was to make sure we are allocating our resources in a way that supports social distancing, while continuing to ensure essential trips are being accommodated. Our next service change, which goes into effect on April 4th, will have some additional minor schedule adjustments, however those will not further impact the routes we've discussed today.

As we look beyond the pandemic, our Board of Trustees has recently approved a Strategic Plan that sets our agency's vision toward regional mobility. We are thinking big about how we can re-imagine our services to maximize the benefit that we are providing to Summit County. A first step in achieving this vision, is something called a Comprehensive Operational Analysis that will begin in the next couple of months. This Analysis will deep dive into how exactly we can adjust and transform our existing services to improve access to opportunity and meet the needs of our community.

There will be many opportunities for the public to participate with us throughout that process (most likely beginning in late-summer/fall), so please keep an eye on our website and social media for more information.

We will now move into the question and answer period. Please feel free to type your question or comment in the Q&A section.

One question has come in from the attendees:

Q. How long do you think that we will be on a Contingency Schedule?

A. I wish I had a crystal ball, and I could directly answer this question. I will say that with each service change, we continue to add service back and make sure we're adding service in a way where we're serving those essential trips and making work connections. If there's something specific that you are missing, that you had in your pre-pandemic travels, I'd encourage you to leave a comment in the question box or on our website, with what you're specifically looking for. At this point, we just continue to adjust with each service change as the world changes around us.

Any additional comments can be submitted in the question and answer box, chat box, or on our website (through a link to a feedback form) or you can drop off a comment at the Transit Center. The official deadline to submit comments to be included in the public record is 2:00 pm today, but you can continue to address and review comments moving forward for additional service changes.

We appreciate your time today and hope that this information has been helpful. We very much look forward to finding 'normal' again with all of you and supporting Summit County's mobility needs.

Attachment C

Board Resolution 2021-05

February 23, 2021

COMMITTEE ASSIGNMENT: PLANNING / MARKETING / RAIL

RESOLUTION 2021-05

A resolution approving the Service Equity Analysis for major service changes made as a result of the COVID-19 pandemic.

WHEREAS, the analysis was completed in compliance with Title VI of the Civil Rights Act of 1964, as required by Federal Transit Administration (FTA) Circular 4702.1B, dated October 1, 2012; and

WHEREAS, major service changes were made beginning in April 2020 to respond to the COVID-19 pandemic and resulting state of emergency; and

WHEREAS, the FTA stipulates changes directly or indirectly related to an emergency, including ridership and budget reductions, that continue longer than 12 months require an equity analysis; and

WHEREAS, a virtual public hearing was held on February 15, 2021 to present the results of the analysis and collect public feedback; and

WHEREAS, public comments were also able to be made via phone call, METRO's website, and written comment form available at the Robert K Pfaff Transit Center; and

WHEREAS, the Board of Trustees was provided the results of the analysis, a list of all comments, and a transcript of the public hearing at least 7 days in advance of taking action on said analysis, per Resolution 2021-03.

NOW THEREFORE, BE IT RESOLVED by the Board of Trustees of the METRO Regional Transit Authority that,

- 1. The Board has considered the Service Equity Analysis, is aware of the results of said analysis, and is approving the continuation of the major service changes made as a result of the ongoing COVID-19 pandemic and emergency.
- 2. All formal actions of this Board of Trustees related to this Resolution and all deliberations of the Board of Trustees and any of its committees that resulted in such formal action were in meetings open to the public in compliance with all legal requirements, including Section 121.22 of the Revised Code.

DATE ADOPTED: February 23, 2021

ROBERT DEJOURNETT PRESIDENT

DAWN DISTLER.

DAWN DISTLER, CHIEF EXECUTIVE OFFICER/ SECRETARY-TREASURER