

## **Scenario 1: (updated 1/10/2014 using actual 2010 U.S. Census Data – Tract Level Population by Race)**

CATS is rerouting an existing route by 35% of its miles and exceeding the major service change threshold while doing so. Survey and ridership data on that route are not available or detailed enough to provide clarity.

### Determine Minority Populations

Staff has chosen to utilize the 2010 Census data- (Tract Level Population by Race) to identify the minority population (self-identified as other than White-non-Hispanic). For this mock scenario, the staffer has identified this as the most detailed data resource available. The data has been narrowed to within  $\frac{3}{4}$  of a mile (walking distance) of regular routes/rail and  $\frac{1}{4}$  of a mile (walking distance) of express routes i.e. CATS service area. Staff then compares this to the Minority population along the route proposed to be changed.

- The 2010 Census estimated CATS service area minority population as 47.52% with a margin of error 4.572% (note this is a mock margin of error for this scenario based on the US Census' 90% percent confidence level margins of error). The disparate impact threshold would be 52.092%.
- In this mock scenario, the route travels only through a single census tract which is 69.87% minority according to Census data.
- The route's 69.87% minority population exceeds the disparate impact threshold by 17.778%. This triggers the following disparate impact analysis steps due to over-representation of the minority population along the existing route.

### Public Input and Staff Research of Alternatives

CATS' staff would be required to inform the public of the disparate impact (disproportional representation of minority residents) and review alternatives to the rerouting that are suggested by the public during the comment period and in community outreach sessions. Staff would as well have to research potential alternatives including those options known in the transit industry.

### Review consequences and form a Mitigation Plan.

A review would occur to identify if there are any workable alternatives equivalent to the purpose of the change. Staff would then review if any potentially worse consequences would occur by implementing the alternatives.

From the review, staff has to determine if there is a workable option for rerouting service that is less detrimental to the minority residents in the area. If there are none or if the selected alternative to rerouting still has adverse impacts, staff will put together a Mitigation Plan to lessen the effects. This plan would incorporate workable suggestions from the public comment period and industry methods to mitigate adverse effects due to rerouting.

### Metropolitan Transit Commission

The details of this major service change, the impact analyses, alternatives considered and mitigation plan will be presented by staff to the Metropolitan Transit Commission for approval.

## **Scenario 2:**

CATS has proposed a fare implementation on a service (route or rail) that has been previously fare free. In this mock scenario city staff has detailed survey ridership data.

### Determine Low Income Ridership

Staff would utilize the most recent survey data (less than 5 years old) to identify CATS service area's low income ridership.

- Staff would then compare entire system's low income ridership to the low income ridership along the route being changed.
- In this example the survey identifies the system-wide ridership low income population as 53% with a margin of error of 4.2%. The Disproportionate Burden Threshold would be 57.2%.

### Low Income Ridership

1<sup>st</sup> -Determine the low income ridership level on the route in question. For this mock scenario the ridership route ridership has been identified as 60% low income, i.e. the threshold would be exceeded. This would trigger the following disproportionate burden analysis steps.

### Low Income Fare Usage

2<sup>nd</sup> - Staff would identify those fare types (single ride cash, monthly pass, etc.) that low income riders utilize above the 57.2% mark.

If for this mock scenario, it was identified that 62% of low income riders regularly use single trip cash fares (system-wide or on this route if detail is available) this would reinforce the need to perform a disproportionate burden analysis. As well it identifies which fare types to address during the formulation of the mitigation plan.

### Public Input and Staff Research of Alternatives

CATS' staff would be required to review alternatives to the fare implementation that are suggested by the public during the comment period and in community outreach sessions. Staff would as well have to research potential alternatives known in the transit industry. A review would occur to identify if any workable alternatives had potentially worse consequences.

### Review consequences and form a Mitigation Plan.

Then, staff has to determine if there is a workable option for the fare implementation that is less detrimental to the low income riders on the route. If there are none or if the alternative still has adverse impacts, staff will put together a Mitigation Plan to lessen the effects. This plan would incorporate workable suggestions from the public comment period and industry methods to mitigate the adverse fare implementation effects.

### Metropolitan Transit Commission

The details of this fare service change, the burden analyses, alternatives considered and mitigation plan will be presented by staff to the Metropolitan Transit Commission for approval.