



Board of Directors

Action Item IX-A

July 12, 2018

Increased Peak Period Red Line Service

Washington Metropolitan Area Transit Authority
Board Action/Information Summary

Action Information

MEAD Number:
202002

Resolution:
 Yes No

TITLE:

Recommendation for Additional Service on Red Line

PRESENTATION SUMMARY:

Management will review the recently completed public participation process, seek board approval of the equity analysis report and recommend the implementation of the additional peak period service on the Red Line.

PURPOSE:

Management seeks approval of the equity analysis and approval to increase peak period service on the Red Line.

DESCRIPTION:

Key Highlights:

This is a follow-up to the March presentation to the Safety and Service Delivery Committee meeting.

- During April and May 2018 staff conducted public outreach to Red Line riders and the results of the survey showed that over 70% of the responders preferred the increased service.
- A Title VI analysis concluded that there is a disproportionate burden; however, no disparate impact. After mitigating impact with additional service between Silver Spring and Glenmont, the proposal complies with requirements of Title VI and Environmental Justice.
- It is recommended that the peak periods service on the Red Line be increased such that all service is scheduled to originate or terminate at Shady Grove station, eliminating the Grosvenor Turnback.

Background and History:

Beginning December 1984, Red Line service was extended to Shady Grove, instituting the Grosvenor Turnback operating procedure.

In 2015 the Board directed staff to prepare a proposal for the elimination of the

Grosvenor Turnbacks, such that all trains will originate or terminate at Shady Grove station.

In April 2018, the Committee was informed of the alternatives under consideration for increased service on the Red Line and the steps that would be taken for the public participation and the equity analysis.

Discussion:

Currently the Red Line service operates every 8 minutes between Shady Grove and Glenmont (7.5 trips per hour) with additional service operating between Grosvenor and Silver Spring, providing a four-minute headway between these locations (15 trips per hour).

Service alternatives: The following three alternatives have been developed and were presented to the public for comment

- Alternative A: Full elimination of Grosvenor Turnback with 15 trains per hour at Shady Grove, Rockville, Twinbrook and White Flint.
- Alternative B: Partial elimination of Grosvenor Turnback to increase peak period service from 7.5 trains per hour to 12 trains per hour at Shady Grove, Rockville, Twinbrook, and White Flint stations.
- Alternative C: No change

Between April 30 and May 21, 2018 public outreach was conducted to Red Line riders to solicit reactions to the three proposed alternatives to add peak service to the Red Line. This effort included:

- The creation of webpages to inform riders of the proposals and how they could participate in a survey. A press release was distributed;
- Posters in English and Spanish were placed at all Red Line stations;
- Information was posted on social media; and
- All local, state jurisdictional and Congressional offices were notified.

Outreach was conducted at 16 rail stations over a two-week time period and 62,700 brochures were distributed encouraging riders to complete an on-line survey. This effort yielded 9,662 completed surveys, including six percent of respondents who were identified as Hispanic, 23 percent were minority groups and one percent reported an annual household income under \$30,000.

The results of the survey clearly showed that the majority of the respondents preferred increasing the service.

A Title VI equity analysis concluded that there is no disparate impact on minorities, but a disproportionate burden on the low income population. Staff has taken efforts to mitigate this disproportionate burden, and the proposal complies with requirements of Title VI and Environmental Justice. Mitigation is in the form of a minor increase in service on the Red Line between Glenmont and Silver Spring as a result of extra trains pulling in and out of service during the shoulders of the afternoon peak periods.

As a result of concerns about maintaining good on-time performance with the increased service, staff conducted an operational assessment of Shady Grove terminal and yard operations. In response, added emphasis and oversight will be placed on train movements between the yard and terminal with additional dedicated supervision and yard operators.

Staff has initiated an engineering analysis of potential upgrades that could reduce the long-term risk to reliability from the increased service. The engineering analysis will investigate potential improvements of the Shady Grove interlocking, the track configuration around the terminal and vertical access improvements at Shady Grove station. This analysis will be completed by the end of FY19. Any recommended improvements would be incorporated into future capital programs.

FUNDING IMPACT:

The additional service for Alternative A on the Red Line has an estimated annual operating cost of \$2.5 million. Because the service implementation date is December of 2018, the FY19 impact will be \$1.25 million. The FY19 budget amendment for this service increase was approved by the Board in June 2018.	
Project Manager:	James Hughes
Project Department/Office:	Chief Operating Office/Operations Budget, Performance & Planning/Intermodal Planning

TIMELINE:

Previous Actions	Board Resolution 2015-37 directed staff to prepare a proposal for the elimination of the Grosvenor Turnbacks, such that all trains will originate or terminate at Shady Grove station. The Board Resolution 2018-23 amended the FY19 budget including \$1.25 million for the additional Red Line service
Anticipated actions after presentation	It is anticipated that the additional service will start in December 2018. Before then staff will prepare for the initiation of the additional service by hiring and training staff, preparing and distributing of all informational

material, and adding additional supervisory staff to manage the increased service.

The Infrastructure Study will be completed by the end of fiscal year 2019.

RECOMMENDATION:

Board approval of:

1. the Title VI report
2. the increase in peak period service by eliminating the Grosvenor Turnback and having all trains serve Shady Grove station to begin in December 2018.



Washington Metropolitan Area Transit Authority
Public Outreach & Input Report

Additional Peak Period Service on the Red Line
July 2018

INTRODUCTION

Currently during rush hour, Red Line trains arrive every 8 minutes (7.5 trains per hour) between Shady Grove and Glenmont. Additional service operates between Grosvenor and Silver Spring, with trains arriving every 4 minutes (15 trains per hour) between those stations.

Metro is considering two service alternatives that would increase service at Shady Grove, Rockville, Twinbrook and White Flint. Service levels for the rest of the Red Line would not change in any of these alternatives.

- Alternative A: Full elimination of the Grosvenor "turn back," which would extend service to Shady Grove for all trains that currently turn back at Grosvenor. Trains would arrive every 4 minutes (15 trains per hour).
- Alternative B: Partial elimination of the Grosvenor "turn back," which would extend service to Shady Grove for approximately half of the trains that currently turn back at Grosvenor. Trains would arrive on average every 5 minutes (12 trains per hour).
- Alternative C: No change. Trains would continue to arrive every 8 minutes (7.5 trains per hour).

This report includes an overview of the public participation plan that was followed, as well as a summary of the feedback received from the public.

COMMUNICATIONS & OUTREACH TO THE PUBLIC

In order to encourage public feedback on the proposal, as well as to fulfill the Board-approved Public Participation Plan, Metro tailored a communications and outreach plan. This intensive effort was necessary for reaching riders most impacted by the proposal.

The majority of the communications and outreach effort was concentrated between April 30 and May 21, 2018. The final plan included the following efforts:

- Outreach events at stations
- Targeted marketing & media

In order to best manage resources in the allotted amount of time, the majority of outreach efforts focused on Red Line riders where the proposed changes would have the greatest impact. A demographic overview of the impacted customers can be viewed in Part I of the Title VI equity analysis report. Feedback was collected through an online survey in English and Spanish.



Outreach Events at Stations

Outreach street teams, comprised of Metro contractors, traveled to various Metrorail stations along the Red Line for a total of 32 shifts to pass out brochures about the proposal and encourage riders to take the online survey. Team members wore Metro aprons and those who were bilingual wore large pins that identified them as speaking another language. Half of all street teams were fluent in Spanish, and some teams also had Chinese speakers. Team members estimate that they had over 1,100 interactions with customers in Spanish during their outreach.

Over 62,700 brochures were distributed during the outreach. The brochures were in English and Spanish – view a copy on page 4.

Station Outreach By the Numbers	
# of outreach shifts	49
# of locations	47
# of outreach hours	194.5
Total # of brochures/fliers distributed	62,700

Metrorail Station Outreach Schedule		
Date	Station	Shift Time
Tuesday, May 1, 2018	Shady Grove	6:00-10:00 a.m.
	Rockville	
	Grosvenor-Strathmore	
	Twinbrook	
	Medical Center	
Wednesday, May 2, 2018	Cleveland Park	6:00-10:00 a.m.
	Van Ness-UDC	
	Tenleytown-AU	
	Friendship Heights	
Thursday, May 3, 2018	Bethesda	6:00-10:00 a.m.
	Gallery Place	
	Metro Center	
	Farragut North	
	Dupont Circle	
Tuesday, May 8, 2018	Woodley Park	3:30-7:30 p.m.
	Cleveland Park	
	Van Ness-UDC	
	Tenleytown-AU	
Wednesday, May 9, 2018	Friendship Heights	3:30-7:30 p.m.
	Bethesda	
	Gallery Place	
	Metro Center	
	Farragut North	
Thursday, May 10	Dupont Circle	6:00-10:00 a.m.
	Woodley Park	
	Shady Grove	
	Rockville	
	Grosvenor-Strathmore	





RED LINE RIDERS:

We want to hear from you!

Metro is considering running more trains to Shady Grove during rush hour. This would limit the number of trains that “turn back” at Grosvenor-Strathmore.

What do you think? Get more information and fill out a survey to let us know how this would impact your ride.

Complete the survey online at wmata.com/redline before 5pm on Monday, May 21, 2018.



USUARIOS DE LA LÍNEA ROJA:

¡Metro quiere saber su opinión!

Metro está considerando opciones para aumentar el servicio en el número de trenes con dirección a Shady Grove durante las horas pico. Esto puede limitar el número de trenes que paran y regresan de la estación de Metrorail de Grosvenor-Strathmore.

*¿Qué piensa sobre esta propuesta? Para obtener más información, compartir sus comentarios y decirnos la manera que estos cambios podrían afectar su viaje, **complete la encuesta en wmata.com/redline antes de las 5:00 p.m. del lunes, 21 de mayo de 2018.***

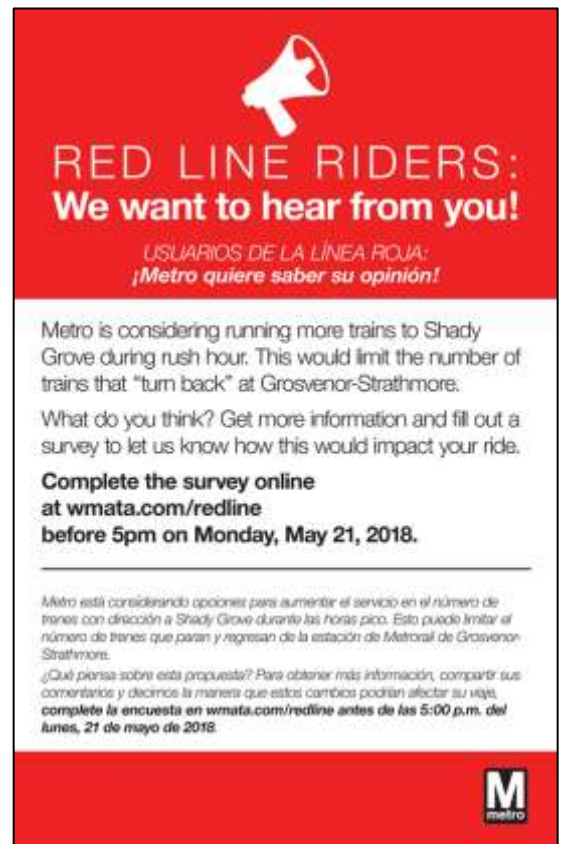




Targeted Marketing & Media

Metro used targeted marketing and media strategies to increase awareness and encourage feedback on the proposal. Local stakeholders also helped spread the word and encouraged feedback from their constituents about the proposals.

- The creation of the webpages wmata.com/redline informed customers about the proposal and how customers could provide information and included the survey link and outreach locations. The page was also professionally translated into Spanish.
- English and Spanish signs were posted in all Metrorail stations along the Red Line. Information was also displayed on the station manager kiosk customer information display screens.
- A press release was published on Tuesday, May 1, 2018.
- Social media (Facebook, Twitter) was used to post information about the proposal.
 - Total Facebook views: over 1,020 people reached
 - Total Twitter impressions: over 37,750 reached across 3 tweets
 - Total Twitter engagements: over 610 across 3 tweets
- The Office of Government Relations provided information about the proposal to local, state jurisdictional and Congressional staff. Staff addressed follow up questions to the plan to ensure elected officials and their staff had a thorough understanding.
- Rail employees were notified of the proposal through *Station Manager DIRECT*, an internal notification online message board.

**RED LINE RIDERS:
We want to hear from you!**

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Public Input Results

Metro collected public input via an online survey – administered in English and in Spanish -- that was in field from April 30 until May 21, 2018.

The effort yielded 9,662 completed surveys. 6% of respondents identified as Hispanic, 23% belonged to minority groups, and 1% reported an annual household income under \$30,000.

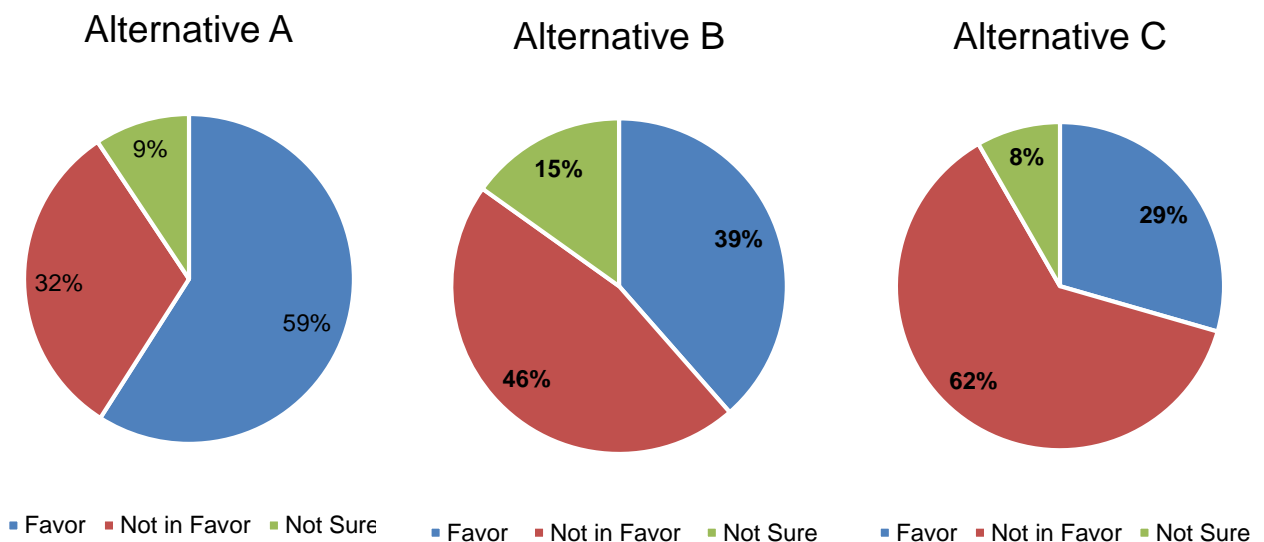
Respondents to the survey were reminded of how the Grosvenor “Turn-Back” currently operates during morning and evening rush hour periods before they submitted their feedback on the following three proposals:

- Alternative A: Full elimination of the Grosvenor "Turn-Back," which would extend service to Shady Grove for all trains that currently turn back at Grosvenor. Trains would arrive every 4 minutes (15 trains per hour).
- Alternative B: Partial elimination of the Grosvenor "turn back," which would extend service to Shady Grove for approximately half of the trains that currently turn back at Grosvenor. Trains would arrive on average every 5 minutes (12 trains per hour).
- Alternative C: No change. Trains would continue to arrive every 8 minutes (7.5 trains per hour).

General Survey Results

- 59% of respondents are in favor of Alternative A, 32% are not in favor, and 9% are not sure.
- 39% of respondents are in favor of Alternative B, 46% are not in favor, and 15% are not sure.
- 29% of respondents are in favor of Alternative C (not making any changes to current operations), 62% are not in favor, and 8% are not sure.

Figure 1: Responses to Alternatives A, B, and C



Survey Results By Hispanic Origin, Minority Status, and Income

The percentage of minority respondents in favor of Alternative A (56%) is lower than the percentage of non-minority – i.e., White and not Hispanic -- respondents in favor of that proposal (61%). That difference is statistically significant.

Figure 2: Percentage of Respondents in Favor of Alternative A by Ethnicity and Race

	All (N=1014)	Hispanic (N=577)	Non- Hispanic (N=7215)	Minority (N=2,325)	Non- Minority (N=5,717)	Under \$30,000 (N=137)	Above \$30,000 (N=6945)
In Favor	59%	60%	63%	56%	61%	63%	61%
Not in Favor	32%	31%	27%	36%	29%	24%	30%
Not Sure	9%	9%	10%	8%	10%	13%	10%

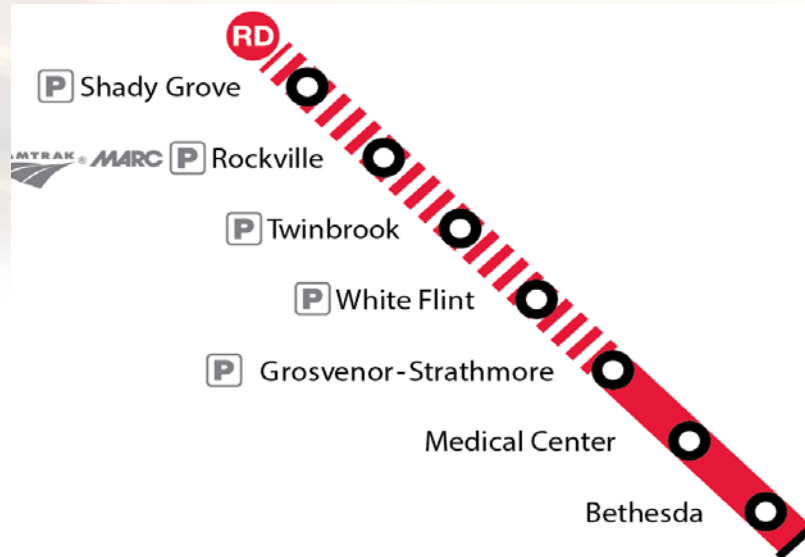
Increase in Peak Period Red Line Rail Service

Joseph Leader
July 12, 2018



Purpose

- Follow-up to March presentation
- Approval of Title VI Report
- Approval to add peak period service on the Red Line



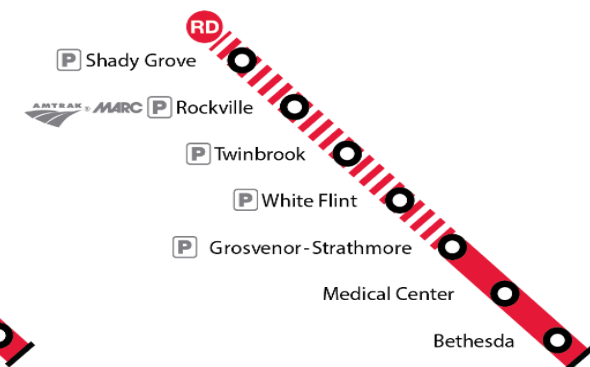
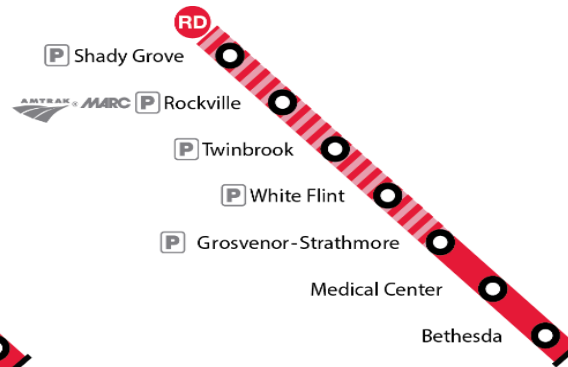
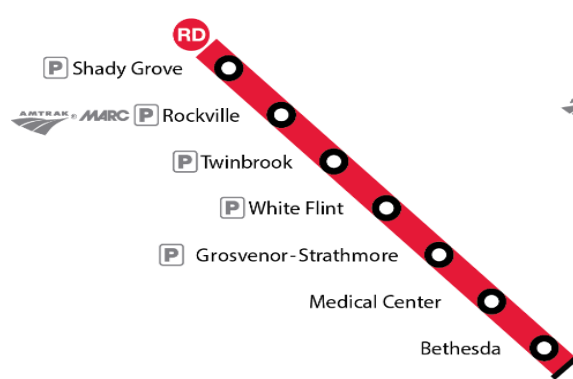
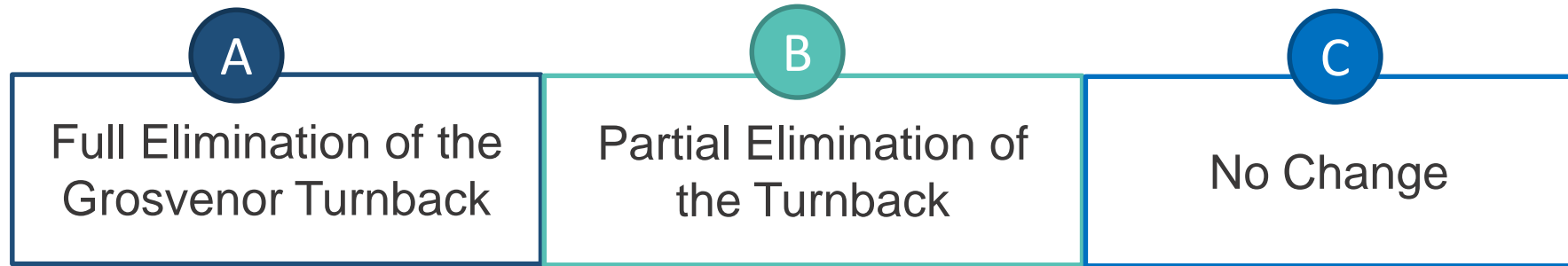
Follow up to March Presentation

Staff committed to return to the Board in July with results on:

- The Public Participation Process
- Title VI Analysis
- Operational analysis to maintain reliability
- Initiate a infrastructure improvement analysis

Service Alternatives

Three options were proposed for public comments:



Service Change

Passengers Boarding north of Grosvenor
 Passenger Per Car (PCC)
 Cost Impact

Increase to 15 trips per hour

Peak Hour	Peak 2 Hours
2,975	5,623
30	25
\$2.50M Ann.	\$1.25 FY19

Increase to 12 trips per hour

Peak Hour	Peak 2 Hours
2,975	5,623
45	34
\$1.25M Ann.	\$0.625 FY19

7.5 trips per hour

Peak Hour	Peak 2 Hours
2,975	5,623
60	50
No Impact	No Impact

Public Participation

- Community outreach was conducted in April and May including:
 - 49 outreach events at 16 stations
 - Distribution of 62,700 brochures
 - Targeted promotion
- Survey Results:
 - 9,662 surveys completed
 - Majority favor additional service
 - 30% favored no change to the service



Title VI Analysis

- Title VI Analysis concluded no disparate impact on minority customers
- Initial analysis showed slight disproportionate burden pertaining to low income residents
 - Staff identified mitigation to comply with requirements of Title VI and Environmental Justice
 - Slight changes in the afternoon staging of trains for the peak
- Adoption of equity analysis does not violate Title VI of Environmental Justice

Operational Analysis

- In response to staff's concern about maintaining on-time performance with the increased service:
 - Discussed best practices with other agencies
 - Conducted comprehensive review of Shady Grove operation, both terminal and yard
- Recommended improvements:
 - Emphasis for train movements between yard and station
 - Additional supervision for both yard and station operation
- Improvements can be made within the original budget estimate



Infrastructure Analysis

- Engineering analysis to reduce risk to reliability from added service
 - Shady Grove interlockings
 - Track reconfiguration
 - Vertical access and platform improvements
- Completed by the end of FY19 with any recommended improvements for future capital programs



Recommendations



Board approval of:

- The Title VI Report
- Increased peak period service by eliminating the Grosvenor turnback and having all trains serve Shady Grove station beginning December 2018

Next Steps



In preparation for a December start of increased service:

- Hire and train additional operating personnel
- Prepare and distribute informational material
- Increase supervisory staff and develop procedures to manage increased service
- Complete Infrastructure Analysis by end of FY19

SUBJECT: APPROVAL OF INCREASE IN PEAK SERVICE ON THE RED LINE AND
TITLE VI REPORT

RESOLUTION
OF THE
BOARD OF DIRECTORS
OF THE
WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY

WHEREAS, The Federal Transit Administration (FTA) requires the Washington Metropolitan Area Transit Authority (WMATA) to conduct a Title VI equity analysis to determine if a major service change will result in a disparate impact (DI) on minority riders or a disproportionate burden (DB) on low-income riders and the WMATA Board of Directors to approve the analysis; and

WHEREAS, In Resolution 2015-37, the Board of Directors directed staff to "prepare for the Board's consideration a proposal for the elimination of the Grosvenor Turnback, such that all peak period rush hour trains will originate or terminate at Shady Grove station, that includes a planned implementation date prior to the beginning of Fiscal Year 2019," which would constitute a major service change for Title VI purposes; and

WHEREAS, Eliminating the Grosvenor Turnback complies with Title VI and Environmental Justice because: (1) it does not result in any reduction or elimination of benefits or service to Metro customers because adding this service does not reduce service on other routes; (2) the additional service does not result in a DI on minority populations; and (3) although adding service between Grosvenor and Shady Grove stations resulted in a DB on low-income populations, WMATA will mitigate the DB by increasing service between Silver Spring and Glenmont; NOW, THEREFORE, be it

RESOLVED, That the Board of Directors approves the attached Title VI equity analysis, and be it further

RESOLVED, That the Board of Directors approves adding the additional peak service on the Red Line to commence in December 2018; and be it finally

RESOLVED, That this Resolution shall be effective 30 days after adoption in accordance with § 8(b) of the WMATA Compact.

Reviewed as to form and legal sufficiency,



Patricia Y. Lee
General Counsel

WMATA File Structure No.:
20.5.1 Rail Scheduling

PROPOSED

M E M O R A N D U M

SUBJECT: Increase in Peak Period Red
Line Service - Title VI Equity
Analysis

DATE: July 6, 2018

FROM: FAIR – Franklin Jones

THRU: IBOP – John Kuo

TO: GM/CEO – Paul J. Wiedefeld

This memorandum documents the methodology and findings of the Title VI equity analysis required for the proposed increase in peak period Red Line service.

I. Conclusion

Metro staff recommends the acceptance of the Title VI equity analysis for the proposed increase in peak period Red Line service. The Federal Transit Administration (FTA) requires an equity analysis of all major service changes (including new service) to ensure that benefits are distributed equitably with regard to minority and low-income customers.

The analysis showed that the proportion of minority ridership expected to use the new service, although lower than the system average, does not present a disparate impact (DI) on minority customers. Low-income ridership expected to use the new service will also be less than the corresponding system average, and would trigger a disproportionate burden (DB) on low-income populations. In accordance with the FTA Title VI Circular (FTA C 4702.1B), staff took action to modify the proposal.

The revised proposal does not present a disparate impact (DI) on minority populations. There is still a DB on low-income populations; however, in accordance with the FTA Circular, it has been significantly mitigated. Adoption of the equity analysis does not violate Title VI or Environmental Justice (EJ) because: (1) the revised proposal does not result in any reduction or elimination of benefits to Metro customers, as implementing this service does not come at the expense of reductions of service; (2) the revised proposal does not result in a disparate impact on minority populations; and (3) the disproportionate burden has already been mitigated as much as practically possible.

II. Service Change Proposals

In 2015, the Board directed staff to prepare a proposal to eliminate the “Grosvenor Turnback.” Instead of terminating at Grosvenor, more Red Line trains would originate and terminate at Shady Grove.

Currently, trains are scheduled to operate every eight minutes (7.5 trains per hour) between Grosvenor and Shady Grove during peak periods. More trains come into service at Grosvenor, creating a four minute headway (15 trains per hour) between Grosvenor and Silver Spring. As outlined in the Board Action/Information Summary (BAIS), the service proposal consists of two options to add service in the section between Grosvenor and Shady Grove: Alternative A: shortening the headway to four minutes (15 trains per hour); or Alternative B: shortening the headway to five/ six minutes (with 12 trains per hour). Both alternatives would benefit customers who enter or exit in the segment north of Grosvenor during peak periods.

In accordance with the Title VI Circular, staff conducted public outreach on the proposed service change. The full Public Outreach report is attached to the BAIS.

III. Title VI Analysis

When a transit agency proposes a permanent fare change or a major service change (including additional service), the Federal Transit Administration (FTA), in its Title VI Circular 4702.1B, requires that the transit agency conduct an equity analysis to determine whether the change will result in a disparate impact (DI) on minority riders or a disproportionate burden (DB) on low-income riders.

In conducting the equity analysis, Metro used the following survey and operations data to determine which populations would be affected by the proposal:

- 2016 Travel Trends Rail Passenger Survey (spring, 2016);
- Rail ridership and revenue data (recent weekdays)

Metro calculated the number of minority and low-income benefiting customers as a percentage of all benefiting customers. Because the proposed service change affects rail customers, Metro then compared that percentage to the system-wide profile for Metrorail (44.91 percent minority; 12.67 percent low-income) as shown in Table One.

Table One: Metrorail Demographic Profile¹

	Annual Ridership (FY 2017)	% Minority Ridership	% Low-Income Ridership	Annual Minority Trips	Annual Low-Income Trips
Metrorail	172,828,600	44.91%	12.67%	77,619,900	21,905,400

To determine whether or not the proposed service change would result in a DI on minority populations or a DB on low-income populations, staff applied the Board adopted DI/DB thresholds (Resolution 2013-27) that correspond to the number of

¹ Based on 2016 Travel Trends Survey of Metrorail Customers

daily impacted riders. (See Table Two). The average daily ridership affected by the service change is estimated to be approximately 25,000 customers. Thus, the DI/DB threshold of six percent was used for the analysis.

Table Two: DI/DB Thresholds

Total Daily Riders Impacted	Threshold for Significant Disparity
Up to 10,000	8%
10,001 to 20,000	7%
20,001 to 40,000	6%
Over 40,000	5%

According to the survey and operations data used in the analysis, 39.11 percent of the Red Line riders benefiting from the additional service are minority and 6.50 percent are low-income. As shown in Table Three, as initially proposed, the proportion of minority customers is 5.8 percent lower than the system average (39.11 percent compared to 44.91 percent), and the proportion of low-income customers is 6.18 percent lower than the system average (6.50 percent compared to 12.67 percent). With a threshold of 6.0 percent, the initial proposal does not result in a disparate impact (DI) on minority customers but does result in a disproportionate burden (DB) on low-income customers.

Table Three – Demographic Summary, Initial Proposal

	Minority Impacted Trips	Low-Income Impacted Trips
Impacted Ratio	39.11%	6.50%
System Average	44.91%	12.67%
Difference	-5.80%	-6.18%

In accordance with the Title VI and Environmental Justice Circulars, staff begin to identify ways to mitigate the DB. After review of ridership, existing service levels, and demographics of other rail service by segment and time of day, staff recommends the following revision to the original proposal:

- Add additional rail service between Silver Spring and Glenmont from 7:00 PM to 8:00 PM

In addition to the original proposal, the service package analyzed now includes additional service between Silver Spring and Glenmont. This addition would lead

to a more “balanced” service proposal in that it would benefit a higher ratio of minority and low-income customers.

As show in Table Four, this revised proposal benefits minority riders at a rate 5.64 percent lower than the system average (39.27 percent compared to 44.91 percent), and low-income riders at a rate 6.08 percent lower than the system average (6.59 percent compared to 12.67 percent). Thus, the revised proposal results in a higher ratio of minority customers benefiting than the original proposal, and does not present a DI to minority customers. The revised proposal also improves the ratio of low-income customers benefiting relative to the original proposal; however, there is still a DB to low-income customers (by 0.08 percent).

Table Four – Revised Proposal

	Minority Impacted Trips	Low-Income Impacted Trips
Impacted Ratio	39.27%	6.59%
System Average	44.91%	12.67%
Difference	-5.64%	-6.08%
Threshold	-6.0%	-6.0%
Exceeds Threshold	No	Yes

IV. Title VI and EJ Circular Requirements

Although the revised proposal exceeds the Board adopted DB threshold for low-income populations, implementing this service change does not violate Title VI or Environmental Justice (EJ). Under Title VI and EJ, Metro may approve an equity analysis that will result in a DB on low-income populations if Metro implements practicable mitigation measures. When determining whether mitigation measures are practicable, Metro must consider the social, economic (including cost), and environmental effects of mitigating the adverse effects on low-income populations. See Pg. 5 of the FTA EJ Circular 4703.1.

Metro has met the criteria for a “practical” mitigation, specifically:

- 1. The proposed mitigation (adding service on the east side of the Red Line between 7:00 and 8:00 PM) benefits low-income customers at a rate higher than that of the original proposal.** Using survey and ridership data, staff estimates that the new service will benefit approximately 1,100 additional customers on a typical weekday. Ridership during this time period at these stations is comprised of a customer base that is 8.84 percent low-income, much higher than the 6.50 percent of low-income customers benefiting under the original proposal.

- 2. Separate from the proposed mitigation listed above, Metro has recently added service between Glenmont and Silver Spring.** As part of service modifications associated with the June rail pick, Metro extended some train trips that used to start or end service at Silver Spring to originate or terminate Glenmont. This resulted in six westbound trips that enter service at Glenmont from 6:30 AM to 7:15 AM, and four eastbound trips between 6:30 PM and 7:45 PM that terminate at Glenmont. The proposed mitigation will add four additional trips terminating at Glenmont between 7:00 and 8:00 PM.

Given these enhanced service levels, additional service in this segment is not practical. Therefore, any additional service to further mitigate the proposal would have to come in the form of full-length trips between Glenmont and Shady Grove during off-peak periods. Such full-length trips would have limited customer utility while adding significantly to operating requirements and cost, and are therefore not practical as a mitigation.

- 3. There is no adverse impact to mitigate.** The proposal would not result in a reduction or elimination of benefits or service elsewhere in the system, as its adoption is not tied another service decision.
- 4. Metro has already added rail service to address peak levels of crowding.** The adoption of the eight minute headway in June 2017 resulted in a 50% reduction in service for some segments of the Yellow and Green Lines. Metro has taken action to address potential crowding, by allocating 100 percent eight car trains on these two lines starting in March of 2018. Metro will be required to report to FTA on passenger loading as it relates to equity during peak (and off peak periods) as part of its next Triennial Title VI submission. Reducing load factors on these lines reduces the risk of non-compliance with these service monitoring requirements.
- 5. Metro has also taken steps to improve access to fare media for Metrobus customers.** In May 2018, Metro begin selling the Seven-Day Regional Bus Pass in Metrorail stations. This action greatly improved access to this important and well-used fare product. Metrobus customers are more than 81 percent minority and 52 percent low-income.