

Recipient ID 5566  
OFFICE OF CIVIL RIGHTS  
OCTOBER 2019

# Title VI Program Update



**Metro**

Los Angeles County  
Metropolitan Transportation Authority

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## **Metro's Profile**

Los Angeles County Metropolitan Transportation Authority (Metro) is unique among the nation's transportation agencies. It serves as transportation planner and coordinator, designer, builder and operator for one of the country's largest, most populous counties. More than 10.1 million people – nearly one-third of California's residents – live, work, and play within its 1,433-square-mile service area.

## **Metro's Vision Statement**

Metro provides excellence in service and support.

## **Metro's Mission Statement**

Metro's mission is to provide world-class transportation for all.

## **Metro Title VI Report Purpose**

The purpose of the Title VI Program Update is to document the steps Metro has taken and will take to ensure that Metro provides services without excluding or discriminating against individuals on the basis of race, color and national origin. In addition to the Title VI protected categories, Metro will take steps to ensure that our programs and activities do not exclude or discriminate against low-income individuals or other classes protected by Federal or State law.

## **Contact Information:**

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Metro Office of Civil Rights

(213) 922-2748

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## INTRODUCTION

The Los Angeles County Metropolitan Transportation Authority (Metro) has prepared this Title VI Program Update in compliance with Title 49 CFR Section 21.9(b) and with the Federal Transit Administration (FTA) Circular 4702.1B “Title VI Requirements and Guidelines for Federal Transit Administration Recipients,” issued October 1, 2012.

This Title VI Program Update is being submitted to FTA in accordance with FTA’s Concurrence letter sent to Metro on December 6, 2017. In the Concurrence letter, FTA informed Metro that our Title VI Program Update, submitted on November 17, 2016, met the requirements set out in the FTA Title VI Circular, 4702.1B and that that our next Title VI Program Update would be due October 1, 2019. A copy of this letter is included in **Appendix A**. On May 24, 2019, Metro staff submitted a request for a 30-day extension due to a five month vacancy of the Title VI staff position. The request was granted by FTA’s Region IX Regional Civil Rights Officer, Lynette Little. The new due date was changed to **November 1, 2019**. This Program Update will be for the period of **December 1, 2019 to November 30, 2022**.

This plan was prepared through an agency-wide effort to ensure that the level and quality of Metro’s transit services are provided in a non-discriminatory, safe, reliable and equitable manner. Metro ensures that full and fair participation is offered to all those that reside, work, and travel throughout Los Angeles County.

Any questions regarding this Title VI Program Update can be directed to the Chief Civil Rights Programs Officer or Aida Berduo Berry, Senior Manager of Civil Rights Programs (Title VI) at [BerryA@Metro.net](mailto:BerryA@Metro.net) or at (213) 922-2748.

## GENERAL REQUIREMENTS

This section addresses the General Requirements as described under Chapter III of FTA Circular 4702.1B.

### **1. Notification to Beneficiaries of Title VI Protections**

Metro is committed to ensuring that the public is aware of the rights and protections afforded to them under Title VI. In accordance with Title 49 CFR Section 21.9(d) and guidance provided in FTA Circular 4702.1B, Metro's Civil Rights Policy includes:

- I. A statement that the agency operates programs without regard to race, color, or nation origin;
- II. A description of the procedures that the public should follow in order to request additional information regarding Metro's Title VI obligations;
- III. A description of the procedures that the public needs to follow in order to file a Title VI discrimination complaint.

Metro's Civil Rights Policy can be found on the Metro website at:

<http://www.metro.net/about/civil-rights-policy/>.

Notice regarding Metro's Civil Rights Policy has been disseminated throughout Metro's rail and bus system. Metro's Notice of Civil Rights also contains a statement that Metro operates its programs without regard to race, color, or national origin and provides a phone number for customers to call to get information regarding Metro's Title VI obligations and the procedure for filing a Title VI discrimination complaint.

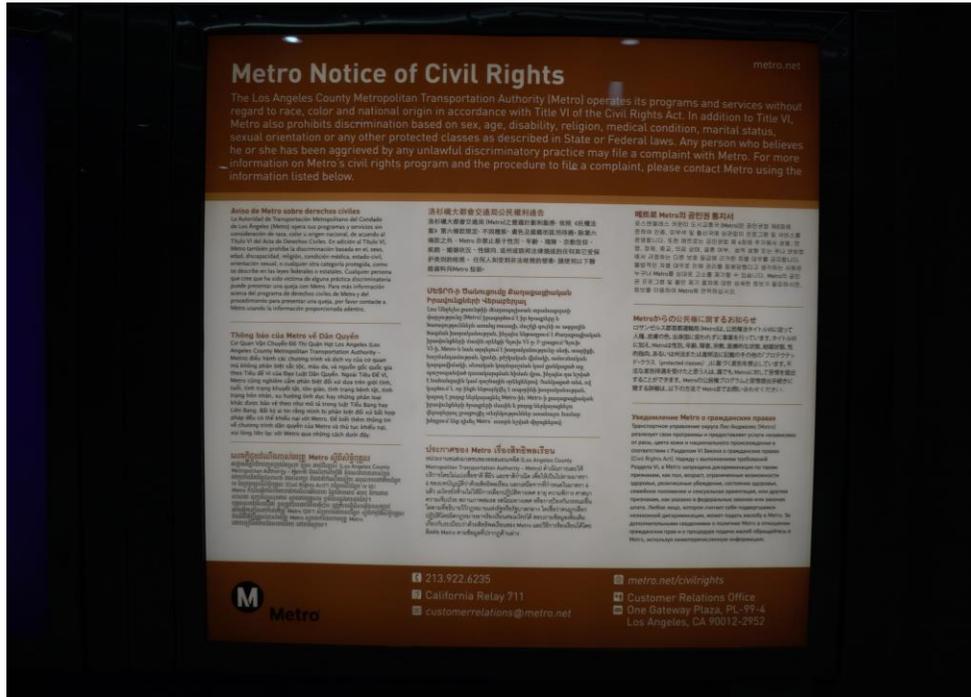
Metro's Notice of Civil Rights has been placed in backlit cases in almost all rail stations. It has also been posted on all 25 floors of Gateway Plaza, Metro's headquarters, as well as in all of Metro's Divisions. A "take-one" brochure of the notice is placed on buses. The notice is also available at Metro's Customer Centers.

The Civil Rights Notice in the backlit cases and the brochures have been translated into the nine languages identified in Metro's Language Assistance Plan: Spanish, Korean, Chinese, Japanese, Armenian, Russian, Vietnamese, Khmer, and Thai. The Civil Rights Policy found on Metro's website has also been translated into the nine languages and with the assistance of Google Translate, may be translated into seven additional languages.

Metro's Civil Rights Notice (**Figure 1**), including photos of the backlit cases (**Figure 2**) along with a list of all of the locations the Civil Rights Notice is posted are included in this section.



Figure 2 (Union Station Backlit Notice)



List of Locations:

Station Name	Location Description	Rail name
Florence Station	Platform North Entry	801-Metro Blue Line
Pico Station	Platform South	801-Metro Blue Line
Vernon Station	Platform North Entry	801-Metro Blue Line
Grand / LATTC Station	Platform East Entry	801-Metro Blue Line
San Pedro Street Station	Platform West Entry	801-Metro Blue Line
Washington Station	Platform North Entry	801-Metro Blue Line
Artesia Station	Platform South	801-Metro Blue Line
Pacific Coast Hwy Station	Platform North Entry	801-Metro Blue Line
1st Street Station	Platform North	801-Metro Blue Line
Maravilla Station	Platform West	804-Metro Gold Line
Willow Street Station	Platform South Entry	801-Metro Blue Line
Compton Station	Platform South	801-Metro Blue Line
103rd Street / Watts Towers Station	Platform Entry North	801-Metro Blue Line
Pacific Ave Station	Platform North Entry	801-Metro Blue Line
Wardlow Station	Platform North	801-Metro Blue Line
Memorial Park Station	East Platform Center	804-Metro Gold Line
Mariachi Plaza / Boyle Heights Station	Platform West (double)	804-Metro Gold Line

Southwest Museum Station	Platform North	804-Metro Gold Line
Pico / Aliso Station	Platform West	804-Metro Gold Line
Fillmore Station	Platform North	804-Metro Gold Line
Lake Station	Platform East	804-Metro Gold Line
Memorial Park Station	East Platform Center	804-Metro Gold Line
Highland Park Station	Platform South	804-Metro Gold Line
Chinatown Station	Platform Center	804-Metro Gold Line
Lincoln Heights / Cypress Park Station	East Platform South	804-Metro Gold Line
Del Mar Station	East Platform Center	804-Metro Gold Line
Downtown Long Beach Station	Platform West	801-Metro Blue Line
Anaheim Street Station	Platform North Entry	801-Metro Blue Line
Vermont / Sunset Station	Mezzanine between entrances	802-Metro Red Line
Universal / Studio City Station	Platform South	802-Metro Red Line
South Pasadena Station	West Platform South	804-Metro Gold Line
Atlantic Station	Platform West	804-Metro Gold Line
Little Tokyo / Arts District Station	Platform North	804-Metro Gold Line
Soto Station	Platform West	804-Metro Gold Line
East LA Civic Center Station	Platform West	804-Metro Gold Line
Hollywood / Highland Station	Mezzanine by Platform Elevator	802-Metro Red Line
Indiana Station	Platform North	804-Metro Gold Line
Hollywood / Western Station	Mezzanine by Platform Elevator	802-Metro Red Line
Del Mar Station	West Platform Center	804-Metro Gold Line
Allen Station	Platform West	804-Metro Gold Line
Monrovia Station	Platform West	804-Metro Gold Line
Irwindale Station	Platform West	804-Metro Gold Line
Duarte / City of Hope Station	Platform East	804-Metro Gold Line
Lake Station	Platform West	804-Metro Gold Line
Monrovia Station	Platform West	804-Metro Gold Line
Irwindale Station	NB Platform East	804-Metro Gold Line
Azusa Downtown Station	SB Platform South	804-Metro Gold Line
Hollywood / Vine Station	Mezzanine -East	802-Metro Red Line
Azusa Downtown Station	NB Platform North	804-Metro Gold Line
Norwalk Station	Platform East	803-Metro Green Line
Crenshaw Station	Platform East	803-Metro Green Line
Redondo Beach Station	Plat. North (north side)	803-Metro Green Line
El Segundo Station	Plat. North (south side)	803-Metro Green Line

Aviation / LAX Station	Platform East (east side)	803-Metro Green Line
Arcadia Station	Platform West	804-Metro Gold Line
Sierra Madre Villa Station	Platform East	804-Metro Gold Line 803-Metro Green Line
Long Beach Blvd Station	Platform East	804-Metro Gold Line
APU / Citrus College Station	Platform West	803-Metro Green Line
Avalon Station	Platform East	803-Metro Green Line
Mariposa Station	Plat. North (north side)	803-Metro Green Line
Vermont / Athens Station	Platform East	806-Metro Expo Line
Jefferson / USC Station	WB Platform Center	806-Metro Expo Line
Expo / Crenshaw Station	EB Platform Center	806-Metro Expo Line
Expo / Vermont Station	EB Platform East	806-Metro Expo Line
Expo Park / USC Station	WB Platform Center	806-Metro Expo Line
26th Street / Bergamot Station	WB Platform North	806-Metro Expo Line
Expo / Sepulveda Station	Platform Center	806-Metro Expo Line
Farmdale Station	EB Platform Center	806-Metro Expo Line
Expo Park / USC Station	EB Platform Center	806-Metro Expo Line
Downtown Santa Monica Station	Platform 1 & 2 North	806-Metro Expo Line
Westwood / Rancho Park Station	Platform North	806-Metro Expo Line
Culver City Station	West Plaza Group of 5(L-R)	806-Metro Expo Line
Palms Station	Platform Center	806-Metro Expo Line
Expo / Crenshaw Station	WB Platform Center	806-Metro Expo Line
Expo / Western Station	WB Platform Center	806-Metro Expo Line
Expo / Vermont Station	WB Platform Center	806-Metro Expo Line
17th Street / SMC Station	Platform North	806-Metro Expo Line
LATTC / Ortho Institute Station	Platform North	806-Metro Expo Line
26th Street / Bergamot Station	EB Platform South	806-Metro Expo Line
Jefferson / USC Station	EB Platform Center	806-Metro Expo Line
Union Station - Metro Red & Purple Lines	Red/Purple Alameda near platform elevator	Metro Red Purple Gold Line (Shared) Metro Red Purple Line (Shared)
Wilshire / Vermont Station	Lower Platform by down escalator	Metro Blue Red Purple Expo Line (Shared)
7th Street / Metro Center Station - Metro Blue & Expo Lines	Hope Mezzanine by TVMs Info Wall 5 displays (L-R)	Metro Blue Expo Line (Shared)
Pico Station	Platform South Entry	(Shared)

Westlake / MacArthur Park Station	Mezzanine (Red) group of 4	Metro Red Purple Line (Shared)
Canoga Station	Unpaid area near Platform 3	901-Metro Orange Line
Reseda Station	WB Center	901-Metro Orange Line
Pierce College Station	WB Center	901-Metro Orange Line
Nordhoff Station	WB Center	901-Metro Orange Line
Warner Center Transit Hub	South	901-Metro Orange Line
Sepulveda Station	WB Center	901-Metro Orange Line
Laurel Canyon Station	WB Center	901-Metro Orange Line
Roscoe Station	WB Center	901-Metro Orange Line
Harbor Freeway Station	Green Platform East	Metro Green Silver Line (Shared)
Valley College Station	WB Center	901-Metro Orange Line
Woodley Station	WB Center	901-Metro Orange Line
Sherman Way Station	WB Center	901-Metro Orange Line
Tampa Station	WB Center	901-Metro Orange Line
Harbor Transitway / 37th St / USC	West Side	910/950 Metro Silver Line
Chatsworth Station	Center	901-Metro Orange Line
Balboa Station	WB Center	901-Metro Orange Line
Woodman Station	WB Center	901-Metro Orange Line
El Monte Station - Upper Level	Entry South-facing	910/950 Metro Silver Line
USC Medical Ctr Busway Station		910/950 Metro Silver Line
Harbor Transitway / Slauson	Platform West (SB)- Facing Tway North Pair	910/950 Metro Silver Line
Harbor Gateway Transit Center	"North Side of Building (l-r	910/950 Metro Silver Line
Harbor Transitway / Manchester	Platform West (SB)- Facing Tway North Pair	910/950 Metro Silver Line
Cal State LA Busway Station	Street Level South Side	910/950 Metro Silver Line

Harbor Transitway / Rosecrans	Street South Side	910/950 Metro Silver Line
Farmdale Station	WB Platform Center	806-Metro Expo Line
Willowbrook - Rosa Parks Station - Metro Green Line	Street West	Metro Blue Green Line (Shared)
De Soto Station	WB Center	901-Metro Orange Line
North Hollywood Station	Platform North - AR Side	Metro Red Orange Line (Shared)
Expo / Bundy Station	Platform Center	806-Metro Expo Line
Vermont / Santa Monica Station	Platform South- AR Side	802-Metro Red Line
Van Nuys Station	WB Center	901-Metro Orange Line
Heritage Square / Arroyo Station	East Platform South	804-Metro Gold Line
Hawthorne / Lennox Station	Platform East	803-Metro Green Line
Douglas Station	Plat. North (north side)	803-Metro Green Line
Downtown Santa Monica Station	Platform 3 & 4 North	806-Metro Expo Line
La Cienega / Jefferson Station	West Plaza Group of 5(L-R)	806-Metro Expo Line
Civic Center / Grand Park Station	1st/Hill Mezzanine group of 3	Metro Red Purple Line (Shared)

## **2. Title VI Complaint Procedure and Complaint Form**

As part of Metro's commitment to ensuring that no person is discriminated against on the basis of race, color, national origin, or any other federal and/or state protected category, and to ensure compliance with 49 CFR Section 21.9 (b), Metro has developed The Civil Rights Policy which includes procedures for investigation and tracking Title VI complaints. Metro policy is to investigate complaints that are filed in writing within 180 days from the date of the alleged discrimination in which the complainant alleges discrimination on the basis of race, color, or national origin. Each complaint alleging discrimination based on race, color, or national origin is categorized as a Title VI complaint and investigated according to Metro's Title VI Complaint Procedure.

The policy can be found on Metro's website at: <http://www.metro.net/about/civil-rights-policy/>

Translated versions of the procedure and complaint form can be accessed by clicking the tab titled "Additional Languages"

A copy of the Civil Rights Policy is included in **Appendix B**. The Complaint Form in English is included in this section.

# Complaint Form



Los Angeles County  
Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

213.922.2000 Tel  
metro.net

## Metro

### Civil Rights Complaint Form

Title VI of the 1964 Civil Rights Act and related nondiscrimination statutes and regulations require that no person in the United States shall, on the ground of race, color or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. In addition to Title VI, Metro also prohibits discrimination based on sex, age, disability, religion, medical condition, marital status, or sexual orientation.

The following information is necessary to assist us in processing your complaint. Should you require assistance in completing this form, please let us know.

Complete and return this form to: Metro Customer Relations, Los Angeles County Metropolitan Transportation Authority, 1 Gateway Plaza, Los Angeles, CA 90012.

1. Complainant's Name: \_\_\_\_\_
2. Address: \_\_\_\_\_
3. City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_
4. Telephone No.: (home/cell) \_\_\_\_\_ (other) \_\_\_\_\_
5. Email address: \_\_\_\_\_
6. Person discriminated against (if someone other than the complainant):  
Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_
7. Which of the following best describes the reason you believe the discrimination took place? Was it because of your:  
a. Race       c. National Origin       e. Age   
b. Color       d. Sex       f. Disability



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g. Religion       h. Medical Condition       i. Marital Status

j. Sexual Orientation       k. Other  \_\_\_\_\_

8. What date did the alleged discrimination take place? \_\_\_\_\_

9. In your own words, describe the alleged discrimination. Explain what happened and whom you believe was responsible. Please use the back of this form if additional space is required.

10. Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court? Yes:       No:

If yes, check each box that applies:

Federal agency       Federal court       State agency

State court       Local agency

11. Please provide information about a contact person at the agency/court where the complaint was filed.

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

12. Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.

\_\_\_\_\_  
Complainant's Signature

\_\_\_\_\_  
Date

### **3. Record of Title VI Investigations, Complaints, or Lawsuits**

In order to comply with 49 CFR Section 21.9(b), Metro's Office of Civil Rights maintains a list of all active complaints, investigations, and lawsuits naming Metro, on the basis of race, color, and/or national origin. This list includes the date of the complaint, investigation or lawsuit; a summary of the allegations; and the status of the complaint, investigation, or lawsuit; and the actions taken in response to the complaints, investigations, and lawsuits. From October 1, 2016 to August 30, 2019, Metro had approximately **156** valid Title VI related complaints.

#### **Investigations**

In addition to the list of complaints, we are including documentation of a Title VI complaint filed with USDOT against Metro which led to an investigation regarding fare enforcement practices in which Metro was subsequently cleared by USDOT.

#### **Complaints**

Metro personnel that customers most commonly interact with are Bus Operators. It is, therefore, not surprising that the majority of Title VI complaints involve customers alleging discrimination by a bus operator. In all cases, the complaint is sent to the operator's division manager and to the Office of Civil Rights (OCR) group by Customer Relations. The complaint is reviewed by the division manager, or the designee of the division manager, who takes a statement from the operator and sends a transcript of the statement to OCR.

Metro buses are equipped with a digital recording device. By 2020, approximately 1250 out of 2200 buses will be equipped with audio recording devices. When a Title VI complaint is received alleging discrimination by a bus operator, it is Metro's procedure to pull the portion of the digital recording that would likely cover the time frame implicated by the complaint. The recording is reviewed by the division manager who then prepares a report and sends the report to OCR. This report contains information regarding the bus operator's version of events, the division manager's observations of the <sup>1</sup>recording, a history of all complaints against the operator for the prior 36 months, and disciplinary actions taken in response to any complaints. All division reports are reviewed by investigators in the OCR group. The investigators have discretion to ask the division manager for more information about the incident, including asking follow-up questions to the operator. The investigator may also review the digital recording themselves, reach out to any witnesses to the incident for follow-up, and ultimately make recommendations regarding disciplinary actions if it is determined that there is merit to the complaint. In some instances, depending on the circumstances presented in the complaint, investigators will request a Mystery Ride<sup>2</sup> to gain insight generally into how the operator approaches customer service and specifically to observe for any other instances of discriminatory animus.

After the investigator reviews all of the available information, a report is written that analyzes the information presented in the underlying complaint, the evidence received in the investigation undertaken, and concludes with a finding of substantiated or unsubstantiated

depending on what the evidence reveals. When a determination is made that a Title VI complaint has merit, operators or other Metro personnel are disciplined appropriately and in accordance with Metro policy, the Metro Bus Operator Rulebook & Standard Operating Procedure, applicable Collective Bargaining Agreements, or other employment contracts. In instances where no merit is found, or disciplinary action is not warranted, operators may be provided with consultation and updated training.

The process for formally closing complaint investigations requires three levels of review. All complaint investigations are reviewed by the Director of EEO Programs and Office Civil Rights, the Chief of OCR, Senior Manager of Civil Rights Programs and County Counsel. Once all parties have reviewed the complaint and findings, the complaint is formally closed and a letter is sent to the complainant and respondent stating that an investigation was conducted and that the matter is closed.

A list of Metro Title VI related complaints, investigations and lawsuits from **October 1, 2016 to August 30, 2019** is included in this section.

### **Lawsuits**

There were no lawsuits filed against Metro pertaining to Title VI violations during this reporting period.

Complaint	Case Number	Type	Basis Of Discrimination	Summary Of Allegations	Finding	Action Taken
10/06/2016	00259-2016	Patron	Race	Patron alleges bus operator would ask African American patrons to pay the zone fares or get out but not Hispanics.	Unsubstantiated - Closed	
10/27/2016	00269-2016	Patron	Color Race	Patron alleges when she asked to get off the bus, the operator opened the front doors and whispered "Fucking N****r!" when she exited.	Unsubstantiated - Closed	
11/17/2016	00291-2016	Patron	Race	Patron alleges the Sheriff deputy asking for TAP cards was extremely civil with the white looking passengers, however he singled out a African American passenger and checked his card.	Unsubstantiated - Closed	EEO attempted to contact complainant to gather more information so that DVR footage could be pulled. However, complainant's phone was not in service. EEO referred incident to management to review Discrimination policy with security staff.
11/28/2016	00294-2016	Patron	Race	Patron, African American senior and disabled, alleges the bus operator allowed 25-30 Latinos to board the bus before her.	Unsubstantiated - Closed	
12/14/2016	00302-2016	Patron	Race	Patron alleges pass up due to her race.	Referred - Closed	Referred to management to address.
12/19/2016	00307-2016	Patron	Color	Patron alleges bus operator refused to let her board and said, "You can't board because you're Black."	Unsubstantiated -	
12/29/2016	00314-2016	Patron	Race	Anonymous caller alleges bus operator made reference to employees as "N" and "Chinos." The anonymous caller also stated that bus operator said that she wanted to drive over anyone who got in her way meaning passengers and other Metro operators. The anonymous caller stated that he recorded some of their conversation, and that he was going to KTLA	Unsubstantiated -	
01/03/2017	00001-2017	Patron	Other Race	Patron alleges that the operator did not charge the Hispanic riders, but double charged the Asians riders.	Unsubstantiated -	
01/03/2017	00007-2017	Patron	Race	Patron alleges bus operator shut the door in his face after mouthing the word "n****r" to him.	Unsubstantiated -	
01/13/2017	00009-2017	Patron	Color	Patron alleges the operator stated that everyone has to pay or otherwise the black people would all think they can ride for free.	Unsubstantiated -	
01/13/2017	00010-2017	Patron	Disability Race	Patron alleges bus operator treated the African American passengers nicer. Patron identified himself as a white male. Operator was described as an	Unsubstantiated -	
01/19/2017	00017-2017	Patron	Race	Patron alleges he requested that the Operator lower the wheelchair ramp. Patron alleges Operator did not lower the ramp and while he was explaining to the operator that he was disabled, another patron punched and pushed him from behind. Patron alleges race played a part in the bus operator's lack of concern and reaction to the incident involving another passenger. Both other passenger and bus operator are African American.	Referred - Closed	Referred to ADA group for further investigation
01/23/2017	00020-2017	Patron	Color Race Sexual Orientation	Patron alleges when they sought the assistance of the bus operator during an altercation with another passenger, the operator stated that both parties would be removed from the bus.	Referred - Closed	Refer back to management. An operator not getting involved in a verbal altercation between two patrons is not a violation of Metro's civil rights
03/13/2017	00066-2017	Patron	Race	Patron alleges bus operator posted a racist comment on Facebook citing "I wouldn't say nothing to a black man's face because all they do is act like animals. The patron was offended by this operator's posted	Substantiated - Closed	Five day suspension

03/29/2017	00092-2017	Patron	Disability Race	Patron alleges this bus operator has refused to pick up wheelchair passengers unless they are Latino and favors Latinos.	Referred - Closed	Referred back to ADA. We will request multiple mystery rides for this operator to monitor his compliance with Metro policy.
05/01/2017	00127-2017	Patron	Race	Patron alleges pass up due to race.	Unsubstantiated - Closed	
05/17/2017	00154-2017	Patron	Color Race	Patron alleges the bus operator told another patron exiting the bus, "N***** you aint hard".	Unsubstantiated - Closed	
05/19/2017	00159-2017	Patron	Color	Patron alleges racial profiling by Metro Security because he was walking up the steps at the same pace as an Asian woman and he was the only one who was forced to show his tap card.	Unsubstantiated - Closed	
05/25/2017	00165-2017	Patron	Race	Patron alleges operator told him to "shut up white boy/man." He alleges that the operator told him she would pull the bus over and smash his head in. Patron stated that the operator teased him and would not allow him to	Unsubstantiated -	Investigation concluded that Operator did not use racially offensive language as alleged, however Operator did use middle finger to "flip off" patron. Operator assessed five day suspension as a result.
06/15/2017	00187-2017	Patron	Race	Patron, white female alleges she was attacked by another patron that was provoked by race and the bus operator did nothing about it.	Unsubstantiated - Closed	
06/16/2017	00186-2017	Patron	Race	Patron alleges bus operator told him to "stop buying liquor so that you can pay the full fare" and various other comments and feels this is racially	Unsubstantiated -	
06/26/2017	00216-2017	Patron	Race	Patron alleges Metro Security officers were writing fare evasion tickets at the BET awards. but never do for Rams or UCLA/USC games.	Referred - Closed	EEO referred complaint back to transit security management to discuss perception of discrimination and counsel security staff on
06/28/2017	00208-2017	Patron	Disability Race	Disabled patron alleges bus operator asked her to clear her seat for a wheelchair patron twice on the same ride but didn't ask African	Unsubstantiated -	
07/12/2017	00220-2017	Patron	Race	Patron alleges bus operator closed the door right in front of a group of black people waiting to board.	Unsubstantiated -	
07/12/2017	00223-2017	Patron	Color	Patron alleges racial profiling because Security approached an older black man lying between two seats on the train and asked for his TAP	Unsubstantiated -	
07/16/2017	00238-2017	Patron	Race	Patron forwarded a Facebook post to Customer Relations allegedly written by a Metro Bus Operator which patron felt was racist	Referred - Closed	Referred to Management. Management will address the matter with the employee and advise her to take down any
08/01/2017	00262-2017	Patron	Color Race	Patron alleges bus operator told him " I'll beat your ass you little punk bitch. I don't care what you are little n***a"	Unsubstantiated -	
08/07/2017	00273-2017	Patron	Color	Patron alleges as he was alighting the bus, the bus operator called him a "White motherfucker!"	Unsubstantiated -	
08/23/2017	00293-2017	Patron	Race	Patron filed a complaint with Metro's Customer Relations department alleging that Metro custodian made racially offensive statements on	Substantiated -	Verbal counseling and mandatory sexual harassment/discrimination correction training

09/05/2017	00318-	Patron	Color Race	Patron alleges that bus operator told him "Get the fuck out of here N***** or I'm going to blow your head off. I'm going to kill you. I'm the Sheriff".	Unsubstantiated - Closed	
09/11/2017	00331-	Patron	Color	Patron alleges racial discrimination because the bus operator asked him, male, African American to stand behind the yellow line but didn't ask anyone else.	Unsubstantiated - Closed	
09/22/2017	00414-	Patron	Race	Patron alleges his wife was harassed by the operator for being .25 cents short in fare but allowed two African Americans to board without paying.	Unsubstantiated - Closed	
10/02/2017	00436-	Patron	Color	Motorist alleges female Hispanic operator said to her "white trash, up yours" while passengers were on the bus.	Unsubstantiated - Closed	
10/06/2017	00473-	Patron	Color	Patron alleges racism due to a fare dispute that the operator is discriminating against him because he is white and the other people were black.	Unsubstantiated - Closed	
10/27/2017	00581-	Patron	Disability National Origin	Patron alleges discrimination because the operator discriminated against him because he was Latino, and gave preferential treatment to the African	Unsubstantiated - Closed	
10/31/2017	00604-	Patron	Race	Patron alleges he was discriminated because when an African American passenger tried paying her fare with coins, the operator told her the fare box was not accepting	Unsubstantiated - Closed	
11/01/2017	00602-	Patron	Color Race	Motorist alleges bus operator wasn't able to get in front of her, so he opened his window and called her a "Monkey." Motorist said the operator kept making monkey	Substantiated - Closed	20 day suspension
11/02/2017	00606-	Patron	Color	Patron alleges that the operator without provocation said aloud "I've had it with these black men".	Unsubstantiated - Closed	
11/03/2017	00625-	Patron	Race	Patron alleges the operator told him, "You should've been at the stop on time, n***a!" Patron said the operator allowed him to board, but when he asked for the operator's name	Unsubstantiated - Closed	
11/06/2017	00627-	Patron	National Origin	Patron alleges he boarded the bus, and while on route, the operator said "Fucking Mexicans!"	Unsubstantiated - Closed	
11/13/2017	00660-	Patron	Race	Patron alleges he is disabled and feels he was racially discriminated against by the operator. Patron states he was standing up behind the yellow line along with other	Referred - Closed	Referred to Management. No causal connect between race and adverse action.
11/15/2017	00657-	Patron	Race	Patron alleges a male Hispanic bus operator declined a courtesy ride to three African American students and allowed a Hispanic student to take a courtesy ride at the very next bus stop.	Unsubstantiated - Closed	
11/20/2017	00663-	Patron	Race	Patron alleges discrimination due to fare dispute. Bus operator yelled at her to pay fare but allowed a Hispanic patron on the bus without paying.	Substantiated - Closed	Defensive driving and ADA training plus mystery riders; Gross Misconduct (Trans 19-written counseling) for conduct/behavior; mandatory sexual harassment/discrimination correction training
11/20/2017	00666-	Patron	Race	Patron alleges Office singled her out to pay for her fare and no one else and feels this was racially driven.	Substantiated - Closed	Employee terminated
12/26/2017	00746-	Patron	Color	Patron alleges the bus operator told her "well you know it's night and you are black" when she asked the operator if he was going to pass her up.	Unsubstantiated - Closed	
01/17/2018	00028-	Patron	National Origin Race	Patron alleges when they asked the bus operator why he let a patron board without paying, the bus operator's answer was, "Because, he was born here." The patron told the bus operator, "You're discriminating against me." According to the patron, the bus operator said; "It doesn't matter Trump is going to deport you, all of you."	Unsubstantiated - Closed	
01/18/2018	00021-	Patron	Race	Patron alleges when he asked the operator "Can you tell that Mexican woman to get out of the way?" The operator replied, "Why don't you go sit down in	Unsubstantiated - Closed	
01/24/2018	00029-	Patron	Race	Patron alleges the Hispanic operator opened the door and said "I'm not letting a n***** on!", then closed the door and departed without allowing him to board.	Unsubstantiated - Closed	
01/29/2018	00033-	Patron	National Origin	Patron alleges he heard the operator call him a "wetback."	Unsubstantiated - Closed	
02/05/2018	00040-	Patron	Race	Patron alleges the bus operator told her "that is why the president wants to get rid of all of you".	Unsubstantiated - Closed	
02/06/2018	00042-	Patron	Race	Patron alleges the bus operator said that black people don't typically have the fare.	Unsubstantiated - Closed	

02/15/2018	00051-	Patron	Race	Patron alleges bus operator discriminated him from boarding and has made a prior complaint of discrimination on this operator.	Unsubstantiated - Closed	
02/15/2018	00052-	Patron	National Origin	Patron alleges the operator made the following comment, "No, I know you Mexican's lie all the time."	Unsubstantiated - Closed	
02/15/2018	00053-	Patron	Race	Patron alleges fare dispute and discrimination because she is Black, but the operator allowed a Hispanic patron to board without paying.	Unsubstantiated - Closed	
02/19/2018	00067-	Patron	Race	Patron alleges bus operator said "They are coming because you are black and in Torrance" in reference to calling the police because she was listening to a lecture on her	Unsubstantiated - Closed	
02/26/2018	00070-	Patron	Race	Patron alleges the male Hispanic operator called him "N*****".	Unsubstantiated - Closed	
03/13/2018	00139-	Patron	Race	Patron alleges discrimination due to fare dispute. Patron alleges operator was adamant of her and her husband paying the correct fare, but allowed African Americans to board	Unsubstantiated - Closed	
03/16/2018	00141-	Patron	Race	Patron alleges bus operator rudely yelled at them saying they better pay or she was	Unsubstantiated - Closed	
04/09/2018	00161-	Patron	National Origin	Motorist alleges bus operator told him "oh you're not an idiot, you're a fucking Mexican."	Unsubstantiated - Closed	Investigation concluded Operator did not use racially offensive language as alleged, however, Operator was assessed a 10 day suspension for conduct unbecoming an employee
05/30/2018	00046-	Patron	Disability Race	Patron alleges he was issued a ticket for fare evasion and alleges discrimination on the basis of race (White) and disability (partially blind with a service animal).	Unsubstantiated - Closed	
06/05/2018	00254-	Patron	National Origin	Patron alleges discrimination based on fare dispute. Operator was rude to her, Hispanic, but allowed African Americans on the bus without paying.	Unsubstantiated - Closed	
06/05/2018	00257-	Patron	Race	Patron with a wheelchair alleges of discrimination because the operator gave a Hispanic man (wheelchair) priority over him to board the bus because he's Hispanic too.	Unsubstantiated - Closed	
06/07/2018	00264-	Patron	Race	Patron alleges discrimination because bus operator asked her and her husband to get	Unsubstantiated - Closed	
06/08/2018	00269-	Patron	Race	Patron alleges bus operator allowed African Americans to board without paying fare.	Unsubstantiated - Closed	
06/11/2018	00267-	Patron	Race	Patron alleges discrimination on the basis of racial profiling by two female rail operators and two male transit officers.	Unsubstantiated - Closed	
07/06/2018	00293-	Patron	Color	Patron alleges racial altercation with another patron and when he approached the bus	Substantiated - Closed	Operator terminated for an unrelated matter
07/10/2018	00296-	Patron	Race, Sex	Patron alleges racism aboard the Metro Bus Line 4.	Unsubstantiated - Closed	
07/25/2018	00307-	Patron	Race	Patron alleges discrimination due to fare dispute because bus operator allowed African Americans to ride without paying fare.	Unsubstantiated - Closed	
07/30/2018	00308-	Patron	Color, Race, Religion	Patron alleges "I have been harassed, stalked, belittled, stalked, people discussing my personal information on the bus to irritate me."	Unsubstantiated - Closed	Complaint closed based on available information
07/30/2018	00310-	Patron	Race	Patron alleges fare dispute due to discrimination. Patron alleges bus operator allowed an African American patron to board without paying but charged him.	Unsubstantiated - Closed	
08/13/2018	00324-	Patron	Race	Patron alleges bus operator told another patron "all you black people do what you want	Substantiated - Closed	Gross Misconduct (Trans 19 - written counseling) for conduct; mandatory re-training
08/28/2018	00333-	Patron	Color, Race	Patron alleges she overheard the operator say "just like a typical black bitch" while she was walking away.	Substantiated - Closed	Discipline issued by Management
08/28/2018	00335-	Patron	Race	Patron alleges bus operator called him "Asian bitch."	Unsubstantiated - Closed	
12/11/2017	00722-2017	Patron	National Origin	Patron alleges the bus operator stated, "All these Latin passengers are always asking for directions. I'm done with it."	Unsubstantiated - Closed	
09/04/2018	00344-	Patron	Race	African American patron alleges Caucasian bus operator said "I speak to your kind" and "your kind is not welcomed".	Unsubstantiated - Closed	
09/06/2018	00349-2018	Patron	Race	Patron alleges bus operator (Asian-American) was sitting at the light with the door open and someone inside was paying the fare. Patron (African-American) alleges that he walked up to the bus with his metro pass in hand. He said that the operator looked him in the eye and shut the door in his face, almost hitting him with the door. The patron stated that he could only assume racism as the reason why his kind was not welcome on the bus.	Unsubstantiated - Closed	
09/07/2018	00348-	Patron	National Origin	Patron alleges "Why does she (bus operator) give all the black people free rides but when a Hispanic is short in money she is really really rude?"	Unsubstantiated - Closed	

09/07/2018	00351-2018	Patron	Race, Color, Disability	Patron alleges discrimination on the basis of race, age, color, sex, disability, medical condition, and sexual orientation.	Unsubstantiated - Closed	
09/07/2018	00352-2018	Patron	Color, Race, Disability, Sexual	Patron alleges discrimination based on race, color, disability, and sexual orientation.	Unsubstantiated - Closed	
09/11/2018	00346-2018	Patron	Race	Patron alleges bus operator passed up three African Americans and announced he passed them up because he knew them and they always cause delays.	Unsubstantiated - Closed	
09/20/2018	00371-2018	Patron	Race	Patron alleges that Metro Red Line Platform Security is using their authority to racially profile and commit acts of discrimination against Metro customers. Patron	Unsubstantiated - Closed	
09/28/2018	00369-2018	Patron	Race, Color	Patron alleges he was passed up "due to discrimination of race, color of his skin and intentionally on purpose."	Unsubstantiated - Closed	
10/02/2018	00372-2018	Patron	Race	Patron, Asian male, alleges Metro Security singled him out for not paying his fare.	Unsubstantiated - Closed	
10/16/2018	00384-2018	Patron	Race	Patron alleges she experienced racial discrimination from a Metro bus operator. Patron alleges as she waited with four other persons of color the bus operator stopped	Unsubstantiated - Closed	
10/29/2018	00415-2018	Patron	National Origin	Patron alleges bus operator did not defend him when another patron was harassing him because he is Mexican.	Unsubstantiated - Closed	
11/08/2018	00401-2018	Patron	Race	Patron alleges a custodian called her a stupid bitch and negative things about black people.	Unsubstantiated - Closed	
11/13/2018	00410-2018	Patron	Race	Patron alleges train operator told him, "Listen, Honkey, I don't take anything, any	Unsubstantiated - Closed	
11/14/2018	00408-2018	Patron	Race	Patron alleges bus operator said "I'm the boss, I can allow blacks to ride" and not "allow whites to go"	Unsubstantiated - Closed	
12/03/2018	00427-2018	Patron	Race	Patron alleges bus operator stopped the bus and said, "n***** get off the bus."	Unsubstantiated - Closed	
12/11/2018	00433-2018	Patron	Race	Patron alleges bus operator does not stop where the signage (Bus Stop) is located, rather stops 10 yards from the stop at the signage when an African	Unsubstantiated - Closed	
12/11/2018	00434-2018	Patron	Race	Patron alleges bus operator told him to "go to the back of the bus like you're supposed to".	Unsubstantiated - Closed	
12/19/2018	00441-2018	Patron	Race	Patron alleges bus operator was racist toward him. He said that the operator told him to discard his open container of soda before boarding the bus and	Unsubstantiated - Closed	
12/26/2018	00440-2018	Patron	Race	fare was free for the Christmas holiday, but told all non-whites who boarded the bus it was and proceeded to make comments of "whiteys in Beverly Hills".	Unsubstantiated - Closed	
01/18/2019	00017-2019	Patron	Race	Patron alleges bus operator called her a, "black ass ni**a" several times and told her to "Shut the f**k up".	Unsubstantiated - Closed	
01/22/2019	00032-2019	Patron	Race	Patron alleges there were six people at the bus stop and the operator let everyone	Unsubstantiated - Closed	
01/23/2019	00040-2019	Patron	Race	Patron alleges bus operator used words such as "negrita" to describe her.	Unsubstantiated - Closed	
01/25/2019	00033-2019	Patron	Race	Patron alleges bus operator called an African-American male patron the "n" word when the patron boarded the bus through the back entrance.	Substantiated - Closed	Operator terminated
01/29/2019	00034-2019	Patron	Race	Patron alleges the operator yelled at her and said, "well if you're not going to say good morning, then n***a bitch you can get off the bus."	Unsubstantiated - Closed	
02/12/2019	00047-2019	Patron	Race	Patron alleges bus operator did not allow a young black male to board the bus because he had no money on his TAP card, but allowed others who were not black.	Unsubstantiated - Closed	
02/19/2019	00052-2019	Patron	Race	Patron alleges operator told him, "All you black n*****s and Latinos are thieves and liars, get the fuck off my bus."	Unsubstantiated - Closed	
02/20/2019	00053-2019	Patron	Race	Patron alleges bus operator told him, "Listen here, n*****I will not pick you up tomorrow. You hear me n*****?"	Unsubstantiated - Closed	

03/08/2019	00068-2019	Patron	Race	Patron alleges bus operator was rude to him, (African American) and another African American senior.	Unsubstantiated - Closed	
03/11/2019	00069-2019	Patron	Race	Patron alleges bus operator almost passed her and her daughter up and told her, "You guys weren't going to pay anyway, so why wait?" and when patron responded with, "So it's because we're black?" the operator did not respond. The complainant alleged that the operator "flipped her the bird" as she exited the bus.	Unsubstantiated - Closed	Investigation concluded Operator did not use racially offensive language as alleged, however, Operator was assessed a Trans 19
03/27/2019	00078-2019	Patron	Race	Patron alleges bus operator was rude and called him "Chino".	Unsubstantiated - Closed	
04/08/2019	00088-2019	Patron	Race	Patron alleges bus operator asked her if she was a member of the KKK.	Unsubstantiated - Closed	
04/22/2019	00103-2019	Patron	National Origin	Motorist alleges woman in Metro uniform driving her personal vehicle followed him to the market, got off and began harassing him and calling him a "stupid Mexican".	Unsubstantiated - Closed	
04/30/2019	00104-2019	Patron	Race	Patron alleges Security Officer harassed him and called him a "n*****".	Unsubstantiated - Closed	
05/21/2019	00140-2019	Patron	Race	Patron alleges bus operator almost called her the "N" word and then preceded to say "you people".	Unsubstantiated - Closed	
05/21/2019	00143-2019	Patron	Color, Race	Patron alleges bus operator rudely and loudly requested she pay the fare of \$1.75 over and over, but did not to three African American patrons who boarded the bus after her.	Pending - Open	Under investigation
05/22/2019	00144-2019	Patron	Race	Patron, African American, alleges bus operator waited for a Hispanic woman to cross the street and get on the bus and did not wait for him when he was just seconds behind her.	Pending - Open	Under investigation
06/04/2019	00145-2019	Patron	Color	Patron alleges operator told him, "You n***a or n***** are always asking for something special. Are you getting off or not?"	Pending - Open	Under investigation
06/14/2019	00243-2019	Patron	Race	Patron alleges bus operator told him upon exiting the bus, "Have a nice day cracker."	Pending - Open	Under investigation
07/29/2019	00214-2019	Patron	Race	Patron, African American alleges pass up by Hispanic Bus Operator.	Pending - Open	Under investigation
07/31/2019	00212-2019	Patron	Race	Patron, African American, alleges Caucasian bus operator murmured the "N" word to him.	Pending - Open	Under investigation
08/07/2019	00244-2019	Patron	Race	Patron alleges bus operator called him a "n*****".	Pending - Open	Under investigation
08/28/2019	00276-2019	Patron	Race	Patron alleges operator singled out his wife and daughter to pay the fare, but didn't say anything when two African American patrons boarded the bus without paying.	Pending - Open	Under investigation
08/29/2019	00275-2019	Patron	Race	Patron, Hispanic, alleges African American bus operator allowed an African American patron to board without paying but pointed at him and told him, "you have to pay".	Pending - Open	Under investigation

**USDOT Complaint Investigation Documentation**



Los Angeles County  
Metropolitan Transportation Authority

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**Metro**

**January 13, 2017**

**TO: BOARD OF DIRECTORS**

**THROUGH: PHILLIP A. WASHINGTON  
CHIEF EXECUTIVE OFFICER**

**FROM: DANIEL G. LEVY  
CHIEF OFFICER, CIVIL RIGHTS PROGRAMS**

**ALEX Z. WIGGINS  
CHIEF, SYSTEM SECURITY AND LAW ENFORCEMENT**

**SUBJECT: TITLE VI COMPLAINT**

**ISSUE**

In December 2016 Metro received notice from the Federal Department of Transportation (DOT) that a formal Title VI complaint against Metro and the Los Angeles County Sheriff's Department (LASD) had been filed with the DOT by the Labor Community Strategy Center. The complaint alleges, between 2012 and 2015, that Metro and the LASD fare checkers were discriminating on the basis of race by "demonstrating a pattern and practice of criminalization, stop and frisk fare enforcement and other quality of life citations and arrests on public transportation that systematically and egregiously target black riders", in violation of Title VI of the Civil Rights Act of 1964.

**DISCUSSION**

The complaint will be jointly reviewed by the DOT Office of Civil Rights and the Federal Transit Administration Office of Civil Rights. The DOT regulations for implementing the requirements of Title VI of the Civil Rights Act encourage informal resolution. Metro will engage the Labor Community Strategy Center to determine if an informal resolution can be reached.

We have informed the DOT and FTA that all of our fare enforcement staff enforce the law equally and do not engage in stop and frisk. If Metro were to learn of such action occurring on our system we would put an immediate and permanent stop to the practice. Fare enforcement is conducted without regard to race, color or national origin consistent with the provisions of Title VI of the

## **USDOT Complaint Investigation Documentation**

Civil Rights Act. Immediate corrective action will be taken if this requirement is not being followed.

Metro has also sought to decriminalize fare enforcement by transferring the processing of citations from the Superior Court to Transit Court at Metro. When legislation allowing us to create Transit Court was approved by the State Legislature it was limited to adult offenders. New legislation has now been passed by the State that allows Metro to extend this decriminalization to young offenders.

Subsequent to the filing of the complaint against Metro and the Sheriff's Department the responsibility for fare enforcement was shifted away from the Sheriff to a completely civilian force directly employed by Metro.

Metro staff and Transit Court in conjunction with the Metro Office of Civil Rights are developing new initiatives to ensure that fare enforcement is conducted equitably and that violators are similarly dealt with fairly and equitably throughout the enforcement process. In addition, Metro will train all of its fare enforcement officers to recognize and overcome implicit racial bias.

### **NEXT STEPS**

Metro will be sending a letter to the DOT acknowledging receipt of the complaint. The DOT and FTA encouraged Metro and the Sheriff to meet with the Labor Community Strategy Center in order to seek a voluntary resolution of the complaint. We will be pursuing a meeting with the Labor Strategy Center to open discussions on the issues raised in the complaint to the DOT.

# USDOT Complaint Investigation Documentation



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**Metro**

**NOVEMBER 3, 2017**

**TO: BOARD OF DIRECTORS**

**THROUGH: PHILLIP A. WASHINGTON  
CHIEF EXECUTIVE OFFICER**

**FROM: DANIEL LEVY  
CHIEF OFFICER CIVIL RIGHTS PROGRAMS**

**SUBJECT: RESOLUTION OF DOT CIVIL RIGHTS INVESTIGATION**

## **ISSUE**

On January 12, 2017 a notice was received from the Federal Department of Transportation (DOT) in Washington advising that they had accepted a formal civil rights complaint against Metro. The complaint from the Labor Community Strategy Center (LCSC) alleged that Metro is discriminating on the basis of race with regard to its policies and practices of fare enforcement, citations and arrest on public transportation in violation of Title VI of the Civil Rights Act of 1964.

The DOT conducted a thorough investigation of the allegations including a site visit to Los Angeles. Hundreds of pages of documentation were provided to the DOT review team. The visit included observations of fare collection and compliance, and a review of Metro policies and practices. On October 23, 2017 the DOT informed Metro that the DOT will administratively close the complaint without any findings and enter into a one year program to provide technical assistance with regard to fare collection and fare enforcement and related public outreach.

## **BACKGROUND**

As a recipient of Federal financial assistance Metro is required to comply with Title VI of the Civil Rights Act of 1964. Title VI specifically prohibits disparate impacts, which are defined as discriminatory impacts based on color, race or national origin resulting from policies or actions which appear to be facially color, race or national origin neutral.

The LCSC alleged that the Metro fare enforcement, citations and arrests deliberately targeted minorities and specifically African American passengers. The LCSC also alleged that Metro fare compliance activities resulted in criminalization of African American fare violators and that Metro had a policy of "stop and frisk" designed to harass African American passengers.

## **USDOT Complaint Investigation Documentation**

Metro has never had a policy of “stop and frisk” and the creation of Transit Court in 2015, and its expansion to include juveniles in 2017 ensures that fare compliance issues do not result in criminalization of violators. Metro also transferred primary fare enforcement duties away from law enforcement to civilian Metro employees earlier this year. Law enforcement officers may assist when needed, but the primary fare inspection is now conducted by non-law enforcement personnel.

The signing of the agreement with the DOT will enable Metro to proactively partner with DOT to collaboratively identify and resolve any practices involving fare collection that could have a discriminatory impact on users.

The DOT will provide technical assistance to ensure that Metro programs for fare collection and fare compliance comply with responsibilities under Title VI while continuing to ensure that public safety goals are met. The DOT will also provide technical assistance on a public outreach campaign designed to inform the public about fare collection and compliance, generate meaningful participation in the process and proactively avoid practices that could have a discriminatory impact on users.

### **NEXT STEPS**

A formal Board Report will be placed on the agenda for the November Operations Committee.



Los Angeles County  
Metropolitan Transportation Authority

**Metro** News

November 3, 2017

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FOR IMMEDIATE RELEASE

## **U.S. Department of Transportation Clears Metro of Fare Compliance Civil Rights Complaint**

The U.S. Department of Transportation has officially cleared the Los Angeles County Metropolitan Transportation Authority (Metro) of a civil rights complaint filed by the Labor Strategy Center alleging fare compliance discrimination on the Metro transit system.

The U.S. DOT closed the complaint following a nearly year-long investigation of the transit agency's fare collection and compliance practices.

In its investigation, the federal transportation agency found nothing to support allegations that Metro was discriminating on the basis of race in its fare enforcement, citation and arrest policies and practices. The Labor Strategy Center initially filed the complaint charging that Metro violated Title VI of the Civil Rights Act of 1964.

To further strengthen Metro's current fare compliance practices, the U.S. DOT will partner with the transit agency to provide technical assistance on fare collection and enforcement and related public outreach for one year.

"We are pleased with the Department of Transportation findings, as they validate what we already know about Metro's fare compliance program: it is universally applicable to all transit riders. Absolutely no one is singled out when checking fares," said Eric Garcetti, L.A. Mayor and Metro Board Chair. "We look forward to working the DOT to bolster our current program and increase our public awareness efforts to ensure that everyone who rides Metro pays their 'fare' share."

In its complaint, the strategy center alleged that Metro had a policy of "stop and frisk" designed to harass African American passengers. Metro has never had a policy of "stop and frisk." To ensure a just and equitable legal process for fare violators, Metro created a Transit Court for adults two years ago and this year expanded it for youths as well. The Transit Court does not treat fare evasion as a criminal offense. Metro's transit court has the flexibility to take a range of actions to remedy fare evasion and it does not result in criminalization for violators.

## USDOT Complaint Investigation Documentation

Since the complaint was filed, Metro has also transferred primary fare enforcement duties away from law enforcement to civilian Metro employees. Law enforcement officers may assist when needed, but primary fare inspection duties are now conducted by non-law enforcement personnel.

“We are doing everything possible to ensure our customers enjoy the most equitable transit system possible,” said Metro CEO Phil Washington. “We have zero tolerance for discrimination of any kind on the Metro System. We also have some of the lowest fares in the country. Simply paying your fare every time you ride avoids any potential problems, and helps generate the revenues we need to continue to provide world-class transit service for all our customers.”

### About Metro

The Los Angeles County Metropolitan Transportation Authority (Metro) is unique among the nation’s transportation agencies. Created in 1993, Metro is a multimodal transportation agency that transports about 1.3 million passengers daily on a fleet of 2,200 clean air buses and six rail lines. The agency also oversees bus, rail, highway and other mobility-related building projects and leads transportation planning and programming for Los Angeles County.

Stay informed by following Metro on The Source and El Pasajero at [metro.net](http://metro.net), [facebook.com/losangelesmetro](https://www.facebook.com/losangelesmetro), [twitter.com/metrolosangeles](https://twitter.com/metrolosangeles) and [twitter.com/metroLAalerts](https://twitter.com/metroLAalerts) and [instagram.com/metrolosangeles](https://www.instagram.com/metrolosangeles).

Metro-139 (General Release)

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#### **4. Public Participation Plan**

Pursuant to FTA Title VI regulations and FTA guidance 4702.1B, Metro made minor updates its Public Participation Plan. This Public Participation Plan has been updated and assembled to capture the methods, innovations and measurements of the agency's commitment to not just meet, but exceed the prescribed requirements of the FTA Circular 4702.1B, citing Metro's responsibilities to limited English Proficient Persons, minority communities, low-income communities, and communities with disabilities. Additionally, the Public Participation Plan integrates principles of FTA Circular 4703.1, guiding Metro on integrating principles of Environmental Justice into the transportation decision-making process. Furthermore, Metro has integrated its Equity Platform in the public participation plan. The Equity Platform includes Title VI protected groups at its core and expands into other protected groups and vulnerable populations. The Public Participation Plan is included in this section along with an Executive Summary of Metro's public participation and outreach efforts since October 2016.

## **Public Participation Plan – Executive Summary**

### **Public Participation Plan and Projects, Programs, Initiatives**

#### **Outreach Overview**

#### **July 2016-June 2019**

This section summarizes the Los Angeles County Metropolitan Transportation Authority's public outreach on the 2019 Public Participation Plan and public engagement undertaken from July 2016 through June 2019. During this reporting period we developed, coordinated and documented outreach and public involvement activities for multiple transit and highway studies, construction projects, joint development and transit-oriented communities, projects and programs in operations, transit safety programs, accessibility outreach, active transportation, and the Long-Range Transportation Plan.

#### **Public Participation**

This Public Participation Plan (Plan) is assembled to capture the methods, innovations and measurements of the agency's commitment to meet and exceed the prescribed requirements of the U.S. Department of Transportation (USDOT), including Federal Transit Administration (FTA) Circulars C 4702.1B citing recipients' responsibilities to Limited English Proficient persons, FTA Circular C 4703.1, guiding recipients on integrating principles of Environmental Justice into the transportation decision-making process, and Federal Highway Administration's (FHWA) Title VI program. The Plan is also consistent with Title VI, (non-discrimination regulations) of the Civil Rights Act of 1964, Section 162(a) of the Federal-Aid Highway Act of 1973 and The Age Discrimination Act of 1975.

#### **2019 Public Participation Plan**

Every three years Metro updates the Public Participation Plan per the requirements listed above. Since the last update in 2016, the Plan was released in early 2019 for the public to review and input. The Draft 2019 Plan included draft revisions including:

- Inclusion of Metro's Equity Platform Framework;
- Organizational changes to the Metro Community Relations Department;
- Updated case studies that reflect Metro's commitment to reach the public beyond traditional methods of outreach.

Metro sought input from the public for the Plan from, March 6, 2019 to Friday, April 12, 2019, to ensure we are doing the best we can to inform the public about Metro projects, programs and initiatives.

Metro staff received 84 comments and updated the Plan based on new outreach tools could support Metro's commitment to go above and beyond federally-prescribed requirements.

The updates incorporated in the Final Plan include:

- Added “limited education attainment levels “
- Further updated the Equity Platform Framework language and included links to the Framework’s activation plan.
- Added language on an agency-wide Community Based Organization Strategy
- Added Active Transportation language and Bike statistics to our outreach efforts
- Added Faith Based and Community Based institutions for meeting locations

Metro appreciated all the input received on the 2019 Public Participation Plan and looks forward to how it will serve as a guide for implementing public engagement programs for the entire agency

### **Projects, Programs, and Initiatives Outreach Overview**

Implementation of Metro’s Public Participation Plan ensures that minority and low-income communities, people with Limited English Proficiency and individuals with disabilities are included in the public participation and engagement process for all Metro projects, programs and initiatives.

The following list identifies all projects for which public outreach activities were performed during the period of July 2016 through June 2019.

### **Planning-Transit, Regional Rail, Highways**

#### San Fernando Valley Region

- East San Fernando Valley Transit Corridor
- North San Fernando Valley Bus Rapid Transit
- North Hollywood to Pasadena Bus Rapid Transit Corridor

#### Westside/Central Region

- Sepulveda Pass Transit Corridor Study
- Crenshaw Northern Extension Project
- Link Union Station
- Vermont Bus Rapid Transit Corridor

#### Gateway Cities Region

- West Santa Ana Branch
- I-710 Corridor Project EIR/EIS

#### South Bay Region

- Airport Metro Connector/96th Street Transit Station
- Green Line Extension to Torrance

#### San Gabriel Region

- Eastside Transit Corridor Phase 2
- Gold Line Foothill Extension, Phase 2

#### **Planning-First Last Mile**

- Blue Line
- Inglewood
- Gold Line Foothill Extension
- East San Fernando Valley Transit Corridor
- Purple Line
- Transit 2 Parks

#### **Highway Projects and Studies**

- I-5 Improvements in North County
- I-105 Express Lanes Project
- SR 710 North Study

#### **Under Construction**

- Purple Line Extension
- Regional Connector
- Crenshaw/LAX Transit Corridor Project
- Division 20 Portal Widening and Turnback Facility
- Patsaouras Plaza Busway
- New Blue Improvements
- Willowbrook/Rosa Parks Station

#### **Joint Development and Transit Oriented Communities**

- Boyle Heights
- Expo/Crenshaw Station
- North Hollywood Station
- Willowbrook/Rosa Parks Station
- Division 6
- El Monte
- Little Tokyo/Arts District Station
- Taylor Yard
- Vermont/Santa Monica Station
- Union Station Commercial Development

### **Active Transportation**

- LA River Path Project
- LA Union Station Forecourt and Esplanade Improvements Project
- Eastside Access Improvements
- Metro Bike Share
- Rail to River Corridor

### **Transit Safety Programs**

- Agency Safety Outreach
- Community Events
- On the Move Riders Club
- Safety Ambassadors
- Safety Orientation Tour Program
- Student Field Trip Program

### **Projects, Programs, Plans and Studies in Operations**

- Emergency Security Operations Center
- Cesar E. Chavez Av Bus Stop Improvements
- Next Gen Bus Study
- Metro Diversity and Economic Opportunity Department (DEOD)
- Metro Parking Management Program
- Metro Rail Operations
- Metro Bus Operations
- Vision 2028

### **Accessibility Outreach**

- Abilities Expo

### **Committees and Councils**

- Metro Local Service Councils
- Metro Citizens Advisory Council
- Accessibility Advisory Committee
- Metro Policy Advisory Council
- Metro Technical Advisory Committee
- Regional Faith Leaders Roundtable

## Outreach Overview

Based on the projects, programs and initiatives listed above, Metro staff has conducted or participated in over 1000+ community meetings, briefings or events throughout Los Angeles County between 2016 and 2019. Additionally, Metro enhances outreach efforts through digital communications, with over 400,000 email subscribers receiving Metro project updates, newsletters or announcements; and over 1,000,000 people reached through Metro's social media platforms. Metro's reach in the County is further augmented through daily stakeholder interactions with daily system riders and Metro's robust Customer Care department.



### 1000+ Public Outreach Activities

- Community Meetings (Public Hearings, Workshops, Roundtables)
- Briefings (Individual, Elected Officials)



### 1 Million + reached via Social Media

- Paid Advertisements
- Social Media Pages (Facebook, Twitter, Instagram, Source, Blogs)



### 400,000 + stakeholders signed up to our projects email distribution lists

- Email blasts
- Newsletters
- Announcements

## Stakeholders

Metro plans, funds, constructs and operates public transportation for 4,751 square miles of land area for the benefit of nearly 10 million residents, making it the most populous of California's 58 counties. The remainder of Southern California's surrounding counties adds more than 11 million residents to comprise a greater regional population totaling over 21 million. Agency accountability for conveying information to the people of the 88 cities and the unincorporated areas that lie within Los Angeles County's borders requires a commitment to appreciate the diverse composition of stakeholders who have been identified in American Community Survey data as 48.1% Hispanic, 27.2% white, 13.8% Asian, 8.0% African American and a broad spectrum of ethnicities that make-up the remaining 2.9%. 14.6% of the population has earnings below the poverty level, 50% of the population is male, 50% of the population is female and 43.5% of the population is age 40 or older. Additionally, 32 languages with multiple dialects have been identified with 1,000 or more language practitioners. Los Angeles County is a multi-culturally enriched environment and a transportation hub for the region, the state and the world.

The following regions includes 88 cities and neighborhoods Metro conducted outreach to within the last three years for its projects, programs and initiatives.



## Gateway Cities

The cities of Artesia, Avalon, Bell, Bellflower, Bell Gardens, Cerritos, Commerce, Compton, Cudahy, Downey, Hawaiian Gardens, Huntington Park, La Habra Heights, Lakewood, La Mirada, Long Beach, Lynwood, Maywood, Norwalk, Paramount, Pico Rivera, Santa Fe Springs, Signal Hill, South Gate, Vernon, Walnut Park, Whittier, and some unincorporated areas of Southeast Los Angeles County.

### **San Fernando Valley**

The valley area of the City of Los Angeles and the cities of Agoura Hills, Burbank, Calabasas, Glendale, Hidden Hills, San Fernando, and Westlake Village

### **San Gabriel Valley**

The cities of Alhambra, Altadena, Arcadia, Baldwin Park, Covina, Diamond Bar, Duarte, East Los Angeles, El Monte, Industry, Irwindale, La Canada Flintridge, La Puente, Monrovia, Montebello, Monterey Park, Pasadena, Pomona, Rosemead, San Gabriel, San Marino, Sierra Madre, South El Monte, South Pasadena, Temple City, Walnut, West Covina and some unincorporated areas of Northeast Los Angeles County.

### **South Bay Cities**

The cities of Carson, El Segundo, Gardena, Hawthorne, Hermosa Beach, Inglewood, Lawndale, Lomita, Los Angeles (Harbor City, Harbor Gateway, San Pedro and Wilmington), Manhattan Beach, Palos Verdes Estates, Rancho Palos Verdes, Redondo Beach, Rolling Hills, Rolling Hills Estates, Torrance, Westchester, and some unincorporated areas of the County of Los Angeles.

### **Westside/Central**

The cities of Beverly Hills, Culver City, Los Angeles, Malib

Metro's complete Public Participation Plan can be found in the Appendix section under **Appendix C.**

## **5. Meaningful Access to Limited English Persons**

Metro supports the goals of Title VI of the Civil Rights Act of 1964, Federal Executive Order 13166 and the Department of Transportation's (USDOT) Limited English Proficiency (LEP) Guidelines by making reasonable accommodations for those individuals with limited English proficiency (LEP) and by providing meaningful access to our services and programs to LEP individuals.

According to the US Department of Transportation's (USDOT) guidance concerning persons with limited English proficiency (LEP), the extent of the Federally-funded recipient's obligation to accommodate LEP populations is determined by balancing the following four factors:

- Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee of Federal funding,
- Factor 2: The frequency with which LEP individuals come in contact with the program
- Factor 3: The nature and importance of the program, activity, or service provided by the recipient to people's lives
- Factor 4: The resources available to the recipient

In 2019, Metro updated the Four Factor Analysis in order to determine the language assistance needs of our stakeholders. Metro then utilized the results of the updated Four Factor Analysis to create a language assistance plan detailing the level of appropriate language outreach. The Language Assistance Plan highlights the ways in which Metro is committed to providing language assistance to our customers.

Metro's Four Factor Analysis and Language Assistance Plan can be found in this section.



**Metro™**

**Limited English Proficiency Plan  
4 Factor Analysis**

**Los Angeles County  
Metropolitan Transportation Authority**

**2019**

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## Introduction

The Civil Rights Act of 1964, Federal Executive Order 13166 and the Department of Transportation's (USDOT) Limited English Proficiency (LEP) Guidelines combine to require that agencies which receive Federal funding are responsible for making reasonable accommodations for those with limited English proficiency. This analysis describes Metro's efforts to comply with these requirements.

Title VI of the 1964 Civil Rights Act prohibits recipients of Federal funding from discriminating on the basis of national origin, including limited LEP individuals, defined as those who have a limited ability to read, write, speak, or understand English. Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (2000), operationalizes non-discrimination of LEP populations by directing Federal agencies to publish guidance for funding recipients as to how to meet these statutory obligations.

According to the US Department of Transportation's (USDOT) guidance concerning persons with limited English proficiency (LEP), the extent of the Federally-funded recipient's obligation to accommodate LEP populations is determined by balancing the following four factors:

- Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee of Federal funding,
- Factor 2: the frequency with which LEP individuals come in contact with the program
- Factor 3: the nature and importance of the program, activity, or service provided by the recipient to people's lives
- Factor 4: the resources available to the recipient

The USDOT guidance has adopted the DOJ's Safe Harbor Provision, which specifies that Federally-funded agencies which translate written materials into languages in which there are greater 1,000 LEP individuals or for which 5% or more of the overall population speaks a given language with limited English proficiency (whichever is lesser) will almost always be considered in compliance. USDOT advises that the four-factor analysis is to be used in a language implementation plan which details the ways in which a recipient of funding will address the needs of the LEP population with respect to benefits, services, and communication.

In addition, the Federal Transit Administration (FTA) has released a number of important policy guidance documents which give further advice to transit agencies that accept Federal funding. One of these, FTA's Circular 4702.1B (2012), reiterates the need for a language implementation plan to ensure that LEP populations have meaningful access to Federally-funded services. FTA's handbook for developing a language implementation plan further details the methodologies for analyzing recipients' obligations to LEP populations.

This document describes Metro's analysis of the limited English proficiency population falling within its service area.

## **Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.**

The USDOT LEP guidance directs recipients of Federal funding to identify the number or proportion of LEP individuals that are likely to come into contact with Federally-funded services and programs. While it is true that Metro's customers include residents of neighboring counties, this analysis shall focus on the population falling within the borders of Los Angeles County, which represents the core users of Metro services. For the purposes of this analysis, those individuals over five years of age who self-identify as speaking English less than well will be considered LEP persons.

### **1.1 Data Sources**

The following data sources were used to assess the prevalence of LEP populations in Los Angeles County:

#### **American Community Survey**

A primary data source identified in the FTA handbook for the purposes of LEP Factor 1 analysis is the American Community Survey (ACS), a monthly survey conducted by the US Census Bureau. Since the ACS uses smaller samples than the decennial census, it lacks the level of precision afforded by larger samples, but yields weighted estimates that are more current than the decennial censuses.

This assessment uses the five year estimates from 2013-2017 for geographic units called Public Use Microdata Areas (PUMA), which are non-overlapping areas, each containing approximately 100,000 people or more. There are 69 PUMAs either partially or fully within Los Angeles County.

#### **Department of Labor**

The Department of Labor published a special tabulation of the 2010 Census, which provides a more detailed language breakdown for counties and large cities associated with Local Workforce Investment Areas (LWIAs). FTA suggests that recipients of Federal funding use this data source since there are frequent overlaps between LWIAs and transit agencies. Metro's service area shares the same boundaries as the three LWIA geographies in Los Angeles County, so it serves as a meaningful data source and a way to refine the broad language categories specified in the Census.

#### **California Department of Education English Learner Data**

In addition, FTA recommends seeking school enrollment data to verify the languages spoken in the service area. The California Department of Education collects information regarding the number of students who are English learners and the languages that they use home. An English learner is defined as an individual who lacks the clearly defined English language skills of listening comprehension, speaking, reading, and writing necessary to succeed in the school's regular instructional programs. The Department of Education records indicate that for the 2017-2018 academic year, Los Angeles County was home to over 1.5 million primary, intermediate, and

high school students in 88 school districts. Of these students, over a quarter are designated English learners.

## 1.2 Assessing the Prevalence and Distribution of LEP Persons

### ACS 5 Year Estimates

For the population five years of age and older in Los Angeles County, just over 14% are LEP and self-identify as speaking English less than well, which is shown in Table 1. While only a small percentage speak no English whatsoever (approximately 5%), a much larger group comprehends some level of English but still struggles with communicating.

Table 1. Census ACS Ability to Speak English, Five Years and Older

	Population 5 and Older	Speak English Only	Speak English Very Well	Speak English Well	Speak English Not Well	Speak English Not at All	LEP Population <Well
<b>Number</b>	9,473,811	4,107,440	3,049,604	983,901	894,388	438,478	<b>1,332,866</b>
<b>Percent</b>		43.36%	32.19%	10.39%	9.44%	4.63%	<b>14.07%</b>

Source: US Census Bureau, American Community Survey, 5 Year Estimates, 2013-2017

The US Census Bureau, through the ACS, also collects information on the ability to speaking English for broad language groupings, as summarized in Table 2. Those speaking Spanish and Asian/Pacific Islander languages in the home have similar levels of limited English proficiency, although the Spanish-speaking population has more than a third more the percentage of individuals that speak no English at all when compared with Asian and Pacific Island language speakers. Both Indo-European and speakers of all other languages have higher levels of English proficiency, but these groups make up less of the overall population than those who speak Spanish or Asian/Pacific Islander languages in the home.

Linguistic isolation, a piece of data collected in the ACS, measures the degree to which a household can communicate in English. Linguistically isolated households are those in which no individual over 14 years of age speaks English greater than "well." As shown in Table 3, those in households speaking Asian/Pacific Islander languages tend to be more linguistically isolated, with just under a third of households in the language group having no person who can speak English very well. Over the last three years, the percentage of linguistically isolated Spanish households went down (24% - 21%) and now is lower than the Indo-European households.

**Table 2. Ability to Speak English by Language Category**

English Proficiency	Spanish		Indo-European Languages		Asian / Pacific Island Languages		Other Languages	
	Population	Percentage within Language Category	Population	Percentage within Language Category	Population	Percentage within Language Category	Population	Percentage within Language Category
<b>Speak Very Well</b>	2,158,691	57.97%	319,136	63.37%	500,045	48.26%	71,732	70.03%
<b>Speak Well</b>	594,045	15.95%	101,466	20.15%	267,693	25.83%	20,697	20.21%
<b>Non-LEP Total</b>	2,752,736	73.92%	420,602	83.51%	767,738	74.09%	92,429	90.24%
<b>LEP Population</b>								
<b>Speak Not Well</b>	629,481	16.90%	59,701	11.85%	197,670	19.08%	7,536	7.36%
<b>Speak Not at All</b>	341,892	9.18%	23,336	4.63%	70,787	6.83%	2,463	2.40%
<b>LEP Total</b>	971,373	26.08%	83,037	16.49%	268,457	25.91%	9,999	9.76%
<b>Overall Total</b>								
<b>Overall Total</b>	3,724,109	100.00%	503,639	100.00%	1,036,195	100.00%	102,428	100.00%

Source: US Census Bureau, ACS 5 Year 2013-17

**Table 3. Linguistic Isolation by Language Category**

Category	Spanish		Indo-European Languages		Asian / Pacific Island Languages		Other Languages	
	Households	Percentage within Language Category	Households	Percentage within Language Category	Households	Percentage within Language Category	Households	Percentage within Language Category
<b>Linguistically Isolated</b>	243,565	21.35%	55,583	23.39%	128,591	31.41%	7,818	16.89%
<b>Not Linguistically Isolated</b>	897,108	78.65%	182,072	76.61%	280,862	68.59%	38,465	83.11%
<b>Total</b>	1,140,673	100%	237,655	100%	409,453	100%	46,283	280,862

Source: US Census Bureau, ACS 5-Year 2013-17,

The five year ACS also gives the number of individuals who speak particular languages in Los Angeles County without regard to their ability to speak English. While this does not identify the number of LEP individuals in each language, it does give an approximation of the prevalence of each language's usage. See Table 4.

**Table 4. Language Spoken at Home**

Language Spoken at Home (Age 5 and Older)	Number of People	Percent of Total Population
Speak only English	4,093,221	43.20%
Spanish	3,731,336	39.38%
Chinese	376,716	3.98%
Filipino, Tagalog	237,075	2.50%
Korean	182,279	1.92%
Armenian	169,250	1.79%
Vietnamese	86,088	0.91%
Persian, Iranian, Farsi	77,018	0.81%
Hindi and related	74,193	0.78%
Japanese	51,661	0.55%
Russian	48,752	0.51%
Arabic	45,915	0.48%
French	43,815	0.46%
Other East/Southeast Asian	29,938	0.32%
Thai, Siamese, Lao	24,356	0.26%
Hebrew, Israeli	24,277	0.26%
German	22,177	0.23%
Dravidian	17,433	0.18%
Italian	15,209	0.16%

Sub-Saharan Africa	13,075	0.14%
Indonesian	13,033	0.14%
Portuguese	12,007	0.13%
Micronesian, Polynesian	9,383	0.10%
Amharic, Ethiopian, etc.	7,932	0.08%
Greek	6,066	0.06%
Serbo-Croatian, Yugoslavian, Slavonian	5,695	0.06%
Dutch	5,354	0.06%
Burmese, Lisu, Lolo	4,950	0.05%
Polish	4,934	0.05%
Rumanian	4,527	0.05%
Swedish	3,759	0.04%
Turkish	3,750	0.04%
Magyar, Hungarian	3,690	0.04%
Near East Arabic dialect	2,360	0.02%
Lithuanian	1,974	0.02%
Other Balto-Slavic	1,909	0.02%
Native	1,906	0.02%
Other Altaic	1,807	0.02%
Ukrainian, Ruthenian, Little Russian	1,782	0.02%
Czech	1,603	0.02%
Yiddish, Jewish	1,523	0.02%

Source: IPUMS-CPS, [www.ipums.org](http://www.ipums.org) US Census Bureau, ACS, 5-Year Estimates (2013-2017)

Understanding the prevalence of language usage in Los Angeles County is undeniably important in formulating plans to address the needs of the LEP population, but understanding the distribution of this group is also integral to providing these LEP services in an efficient manner. Based on PUMA level data from the ACS 2013-2017, **Figure 1** shows the areas of Los Angeles County that have a higher percentage of LEP residents speaking any language than the countywide average and Figure 2-6 show the areas of the top five LEP populations. Maps showing the other language categories were not prepared since the broad categories would not provide meaningful information on specific languages of interest.

**Figure 1.** LEP population in all languages by percentage of total population over 5.

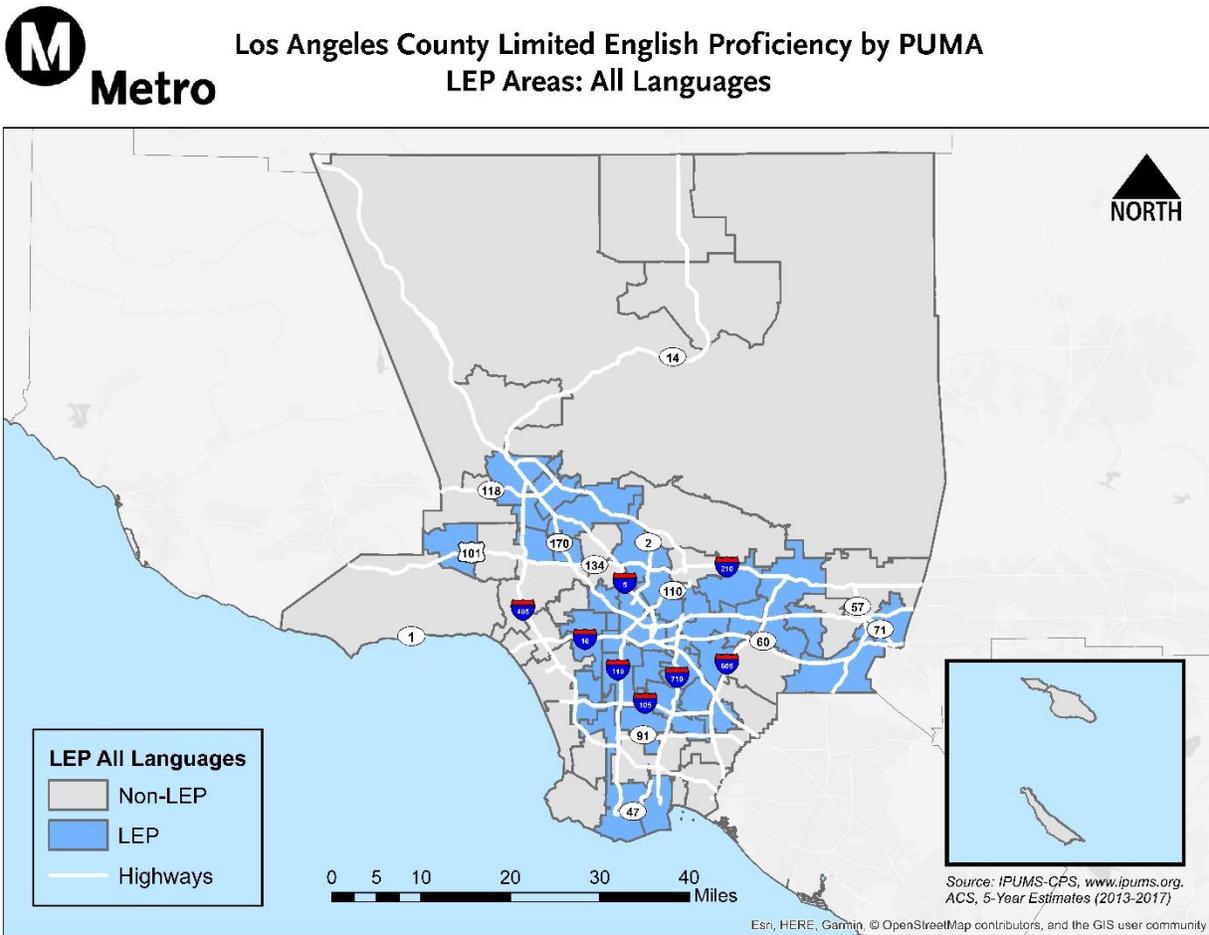


Figure 2. Spanish Speaking LEP population by percentage of total population over 5.



**Metro**

Los Angeles County Limited English Proficiency by PUMA  
Distribution of Spanish Speaking LEP Population

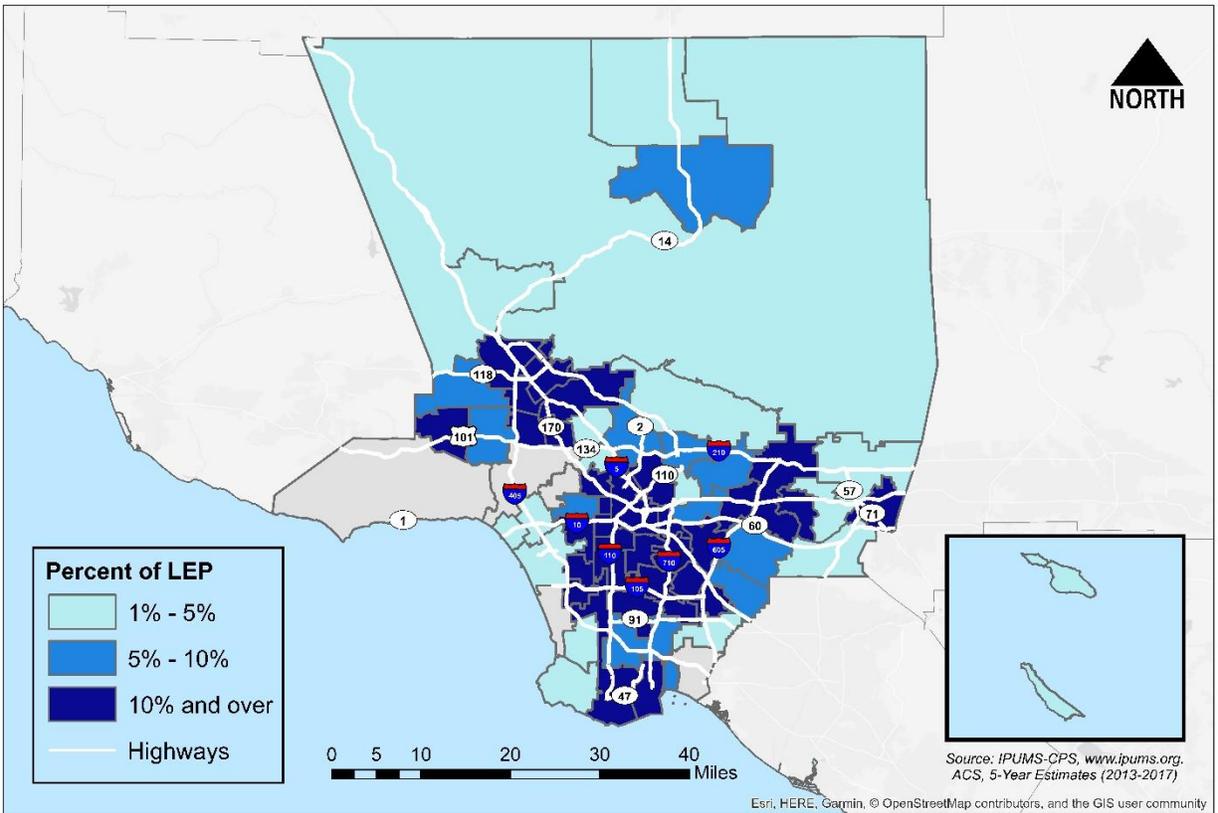


Figure 3. Chinese Speaking LEP population by percentage of total population over 5.



**Metro**

**Los Angeles County Limited English Proficiency by PUMA  
Distribution of Chinese Speaking LEP Population**

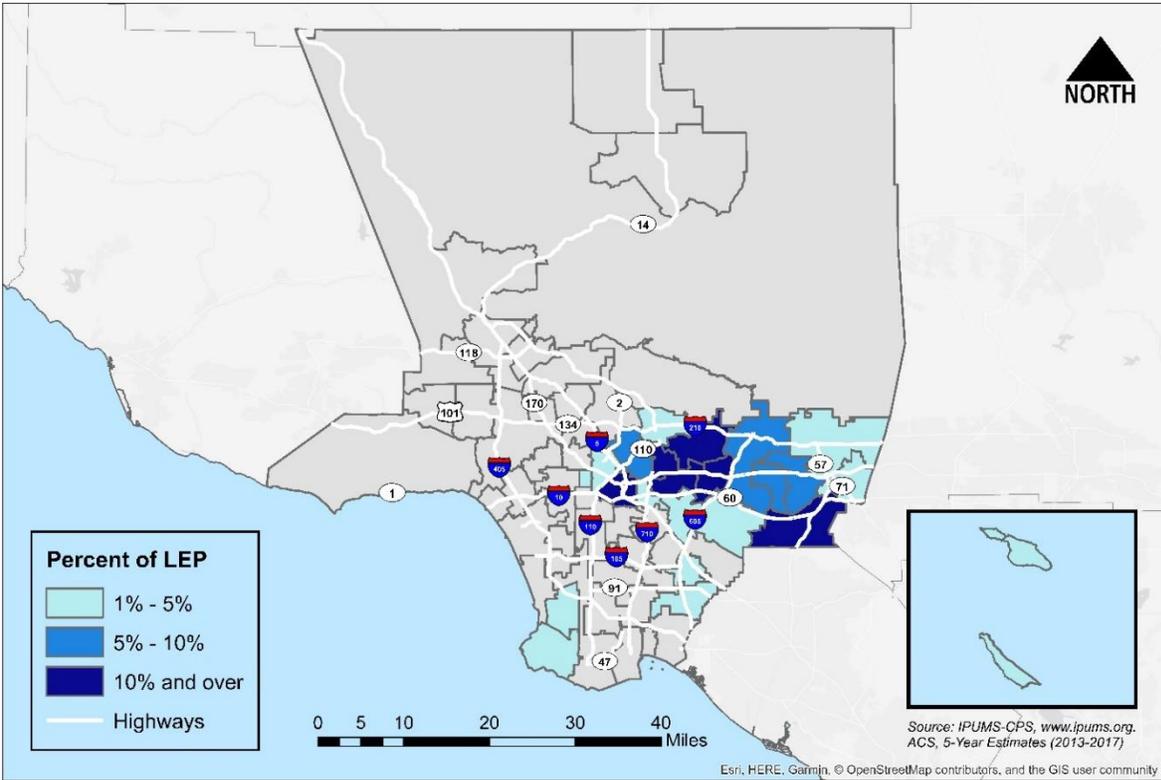


Figure 4. Korean Speaking LEP population by percentage of total population over 5.



**Metro**

**Los Angeles County Limited English Proficiency by PUMA  
Distribution of Korean Speaking LEP Population**

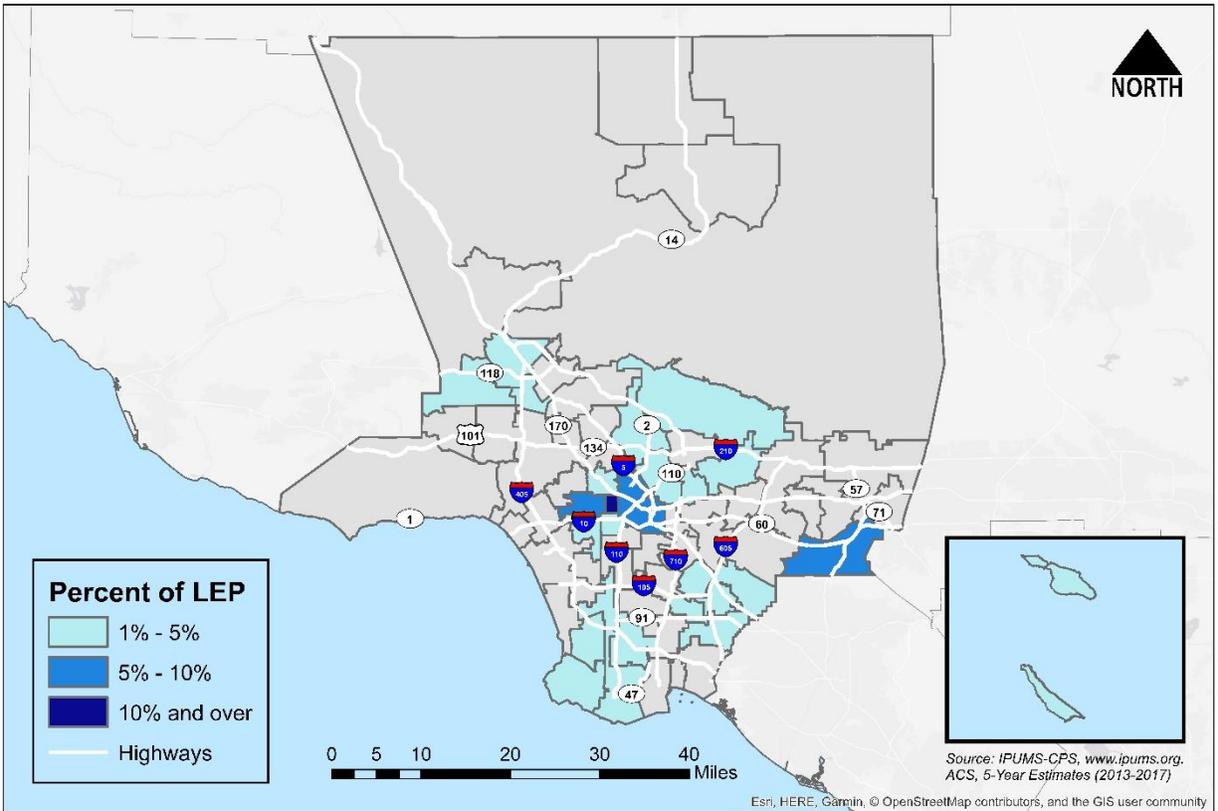


Figure 5. Armenian Speaking LEP population by percentage of total population over 5.



**Metro**

**Los Angeles County Limited English Proficiency by PUMA  
Distribution of Armenian Speaking LEP Population**

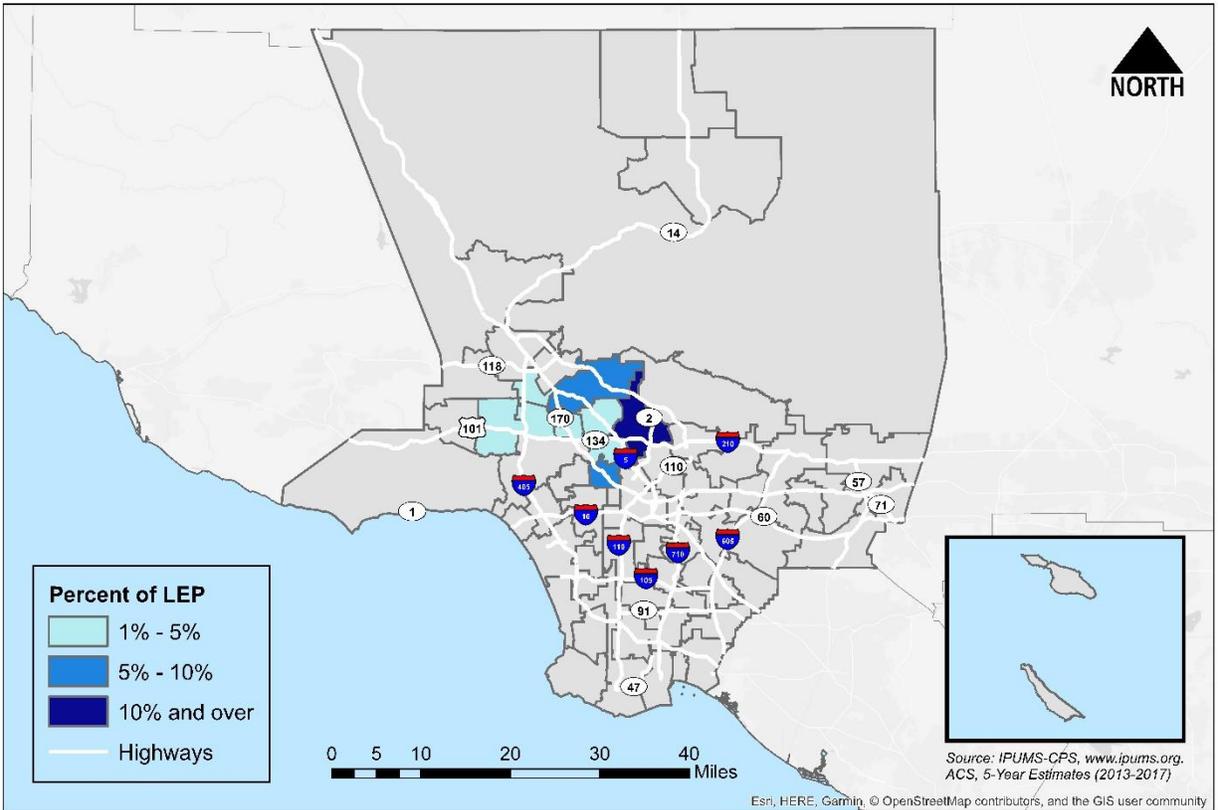
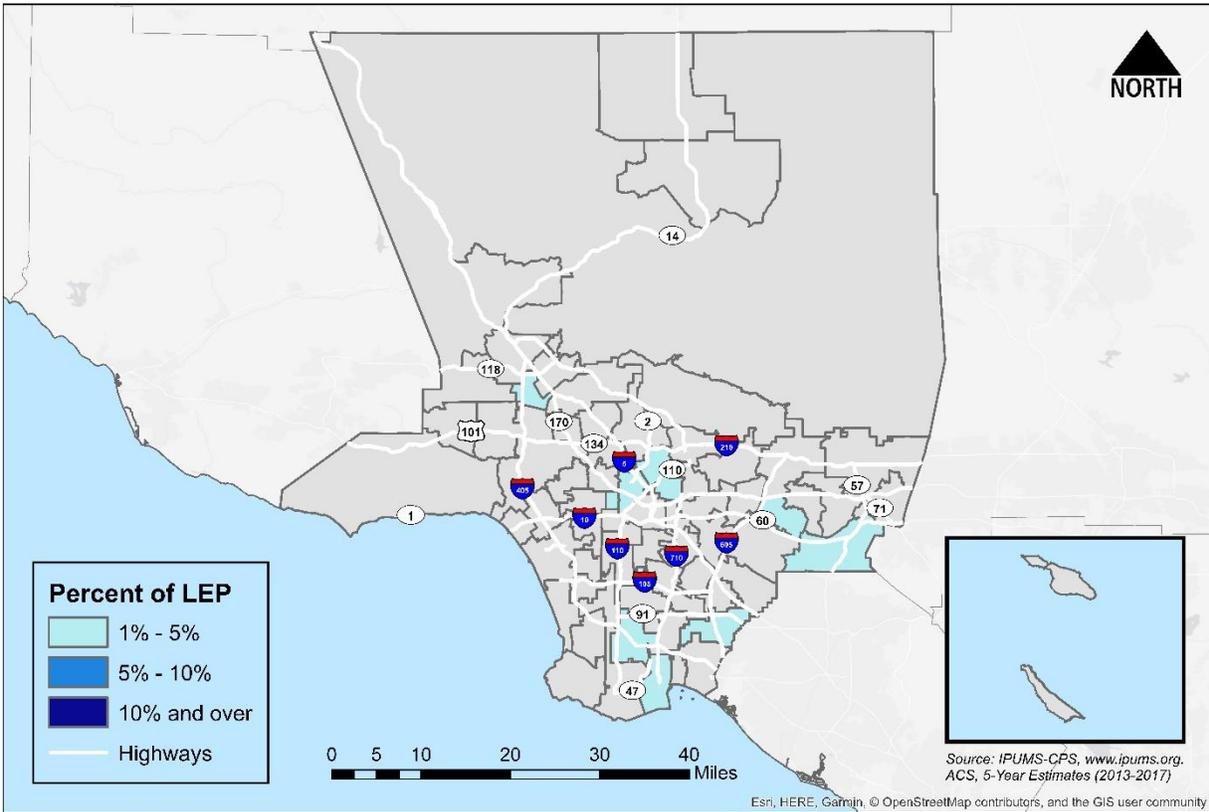


Figure 6. Tagalog Speaking LEP population by percentage of total population over 5.



**Metro**

Los Angeles County Limited English Proficiency by PUMA  
Distribution of Tagalog Speaking LEP Population



## Department of Labor Special Tabulation of the 2010 Census

The Department of Labor’s tabulation of the 2010 Census provides greater detail on the languages spoken in Los Angeles County by breaking down the broad language classifications reported in the Census into the individual constituent languages. Spanish is clearly the most prevalent, with Spanish-speaking LEP individuals making up just under 40% of the population five years of age and older and more than three-quarters of the entire LEP population of LA County. In total, nine languages have approximately 10,000 or greater LEP individuals, as shown in Table 5. This is down from twelve languages 3 years ago.

**Table 5. Language Spoken at Home (general, 62 Languages) by the Ability to Speak English**

	Language Spoken at Home	Total Pop	LEP Pop = Less than Well		
			Number	Pct of Total Pop	Pct of LEP Pop
	Total Population	9,474,066			
	Speak only English	4,093,221			
	Speak language other than English	5,380,845	1,337,755	14.12%	100.00%
1	Spanish	3,731,336	974,660	10.29%	72.86%
2	Chinese	376,716	127,687	1.35%	9.54%
3	Filipino, Tagalog	237,075	15,698	0.17%	1.17%
4	Korean	182,279	63,749	0.67%	4.77%
5	Armenian	169,250	42,783	0.45%	3.20%
6	Vietnamese	86,088	29,695	0.31%	2.22%
7	Persian, Iranian, Farsi	77,018	16,017	0.17%	1.20%
8	Hindi and related	74,193	7,114	0.08%	0.53%
9	Japanese	51,661	10,332	0.11%	0.77%
10	Russian	48,752	11,170	0.12%	0.83%
11	Arabic	45,915	6,079	0.06%	0.45%
12	French	43,815	1,099	0.01%	0.08%
13	Other East/Southeast Asian (Khmer, Hmong)	29,938	9,249	0.10%	0.69%
14	Thai, Siamese, Lao	24,356	6,305	0.07%	0.47%
15	Hebrew, Israeli	24,277	858	0.01%	0.06%
16	German	22,177	494	0.01%	0.04%
17	Dravidian	17,433	1,029	0.01%	0.08%
18	Italian	15,209	776	0.01%	0.06%
19	Sub-Saharan Africa	13,075	618	0.01%	0.05%
20	Indonesian	13,033	2,284	0.02%	0.17%
21	Portuguese	12,007	903	0.01%	0.07%
22	Micronesian, Polynesian	9,383	946	0.01%	0.07%
23	Amharic, Ethiopian, etc.	7,932	861	0.01%	0.06%
24	Greek	6,066	405	0.00%	0.03%

25	Serbo-Croatian, Yugoslavian, Slavonian	5,695	679	0.01%	0.05%
26	Dutch	5,354	103	0.00%	0.01%
27	Burmese, Lisu, Lolo	4,950	1,234	0.01%	0.09%
28	Polish	4,934	282	0.00%	0.02%
29	Rumanian	4,527	350	0.00%	0.03%
30	Swedish	3,759	40	0.00%	0.00%
31	Turkish	3,750	524	0.01%	0.04%
32	Magyar, Hungarian	3,690	228	0.00%	0.02%
33	Near East Arabic dialect	2,360	366	0.00%	0.03%
34	Lithuanian	1,974	180	0.00%	0.01%
35	Other Balto-Slavic	1,909	149	0.00%	0.01%
36	Native	1,906	728	0.01%	0.05%
37	Other Altaic	1,807	259	0.00%	0.02%
38	Ukrainian, Ruthenian, Little Russian	1,782	578	0.01%	0.04%
39	Czech	1,603	70	0.00%	0.01%
40	Yiddish, Jewish	1,523	19	0.00%	0.00%
41	Other Persian dialects	1,523	361	0.00%	0.03%
42	Tibetan	1,310	212	0.00%	0.02%
43	Danish	1,182	20	0.00%	0.00%
44	Norwegian	956	38	0.00%	0.00%
45	Other Afro-Asiatic languages	848	102	0.00%	0.01%
46	Other or not reported	847	300	0.00%	0.02%
47	Finnish	642	0	0.00%	0.00%
48	Other Malayan	514	32	0.00%	0.00%
49	Navajo	474	18	0.00%	0.00%
50	Albanian	435	16	0.00%	0.00%
51	Slovak	430	0	0.00%	0.00%
52	Algonquian	246	12	0.00%	0.00%
53	Celtic	232	0	0.00%	0.00%
54	Hawaiian	193	14	0.00%	0.00%
55	Hamitic	163	11	0.00%	0.00%
56	Aztecian, Nahuatl, Uto-Aztecian	89	0	0.00%	0.00%
57	Aleut, Eskimo	84	0	0.00%	0.00%
58	Athapascan	81	19	0.00%	0.00%
59	Muskogean	58	0	0.00%	0.00%
60	Siouan languages	27	0	0.00%	0.00%
61	Keres	4	0	0.00%	0.00%

IPUMS-CPS, [www.ipums.org](http://www.ipums.org) 2013-2017 ACS 5-year estimates, Language Spoken at Home (General) by the Ability to Speak English

## Department of Education

The California Department of Education compiles statistics on the number of English learners in school. Table 6 summarizes the number of English learners by language spoken at home for the 2017-2018 academic year. This data generally verifies the top languages spoken in the region, and gives a rough indication of the relative abundance of LEP persons for the younger generation, which may help guide future language policy and outreach efforts.

**Table 6. English Learners, Los Angeles County**

Language	Number of English Learners	Percentage of
Spanish	261,688	85.71%
Mandarin (Putonghua)	7,936	2.60%
Armenian	6,192	2.03%
Cantonese	4,187	1.37%
Korean	3,510	1.15%
Filipino (Pilipino or Tagalog)	2,943	0.96%
Vietnamese	2,998	0.98%
Other non-English languages	2,003	0.66%
Arabic	2,285	0.75%
Japanese	1,834	0.60%
Farsi (Persian)	1,029	0.34%
Russian	1,331	0.44%
Khmer (Cambodian)	1,033	0.34%
Hebrew	536	0.18%
Bengali	534	0.17%
Thai	477	0.16%
French	441	0.14%
Hindi	385	0.13%
Urdu	471	0.15%
Punjabi	354	0.12%
Portuguese	348	0.11%
Indonesian	206	0.07%
German	174	0.06%
Telugu	289	0.09%
Gujarati	169	0.06%
Tamil	199	0.07%
Chaozhou (Chiuchow)	93	0.03%
Burmese	125	0.04%
Italian	110	0.04%
Amharic	99	0.03%
Pashto	124	0.04%

Turkish	102	0.03%
Samoan	101	0.03%
Toishanese	110	0.04%
Rumanian	54	0.02%
Cebuano (Visayan)	60	0.02%
Serbo-Croatian (Bosnian, Croatian, Serbian)	36	0.01%
Hungarian	52	0.02%
Polish	47	0.02%
Dutch	35	0.01%
Tongan	70	0.02%
Taiwanese	34	0.01%
Greek	49	0.02%
Lao	40	0.01%
Marathi	39	0.01%
Assyrian	34	0.01%
Ilocano	44	0.01%
Tigrinya	45	0.01%
Kannada	39	0.01%
Bulgarian	27	0.01%
Swedish	28	0.01%
Ukrainian	28	0.01%
Hmong	35	0.01%
Albanian	18	0.01%
Khmu	23	0.01%
Uzbek	20	0.01%
Somali	10	0.00%
Kurdish (Kurdi, Kurmanji)	8	0.00%
Mien (Yao)	1	0.00%
Zapoteco	6	0.00%
Chamorro (Guamanian)	3	0.00%
Mixteco	3	0.00%
Chaldean	1	0.00%
Lahu	1	0.00%
Marshallese	3	0.00%
Kikuyu (Gikuyu)	1	0.00%
<b>Total Enrollment of English Learners</b>	<b>305,310</b>	<b>100.00%</b>

Source: California Department of Education, English Learner Data, 2017-2018

### 1.3 Factor 1 Conclusions

The analysis of the four data sources included in this report showed 15 specific languages in Los Angeles County with more than 1,000 individuals who are Limited English Proficient. This is down from 25 languages three years ago. Those languages and corresponding LEP populations are shown in **Table 7** below. Also included are the languages with LEP persons close to 1,000.

**Table 7. Languages in Los Angeles County with more than 1,000 LEP Persons**

	Language Spoken at Home (Age 5 and older)	Total Population	LEP Pop = Less than Well		
			Number	Pct of Total Pop	Pct of LEP Pop
1	Spanish	3,731,336	974,660	10.29%	72.86%
2	Chinese	376,716	127,687	1.35%	9.54%
3	Filipino, Tagalog	237,075	15,698	0.17%	1.17%
4	Korean	182,279	63,749	0.67%	4.77%
5	Armenian	169,250	42,783	0.45%	3.20%
6	Vietnamese	86,088	29,695	0.31%	2.22%
7	Persian, Iranian, Farsi	77,018	16,017	0.17%	1.20%
8	Hindi and related	91,626	8,143	0.09%	0.61%
9	Japanese	51,661	10,332	0.11%	0.77%
10	Russian	48,752	11,170	0.12%	0.83%
11	Arabic	45,915	6,079	0.06%	0.45%
12	French	43,815	1,099	0.01%	0.08%
13	Thai, Siamese, Lao	24,356	6,305	0.07%	0.47%
	Hebrew, Israeli	24,277	858	0.01%	0.06%
14	Indonesian	13,033	2,284	0.02%	0.17%
	Portuguese	12,007	903	0.01%	0.07%
	Micronesian, Polynesian	9,383	946	0.01%	0.07%
	Amharic, Ethiopian, etc.	7,932	861	0.01%	0.06%
15	Burmese, Lisu, Loo	4,950	1,234	0.01%	0.09%

These languages will be further evaluated in Factors 2, 3 and 4 as recommended by DOT LEP guidance.

## **2.1 Factor 2 Analysis: Employee Survey - The frequency of contacts with LEP individuals.**

### **Approach**

As part of the data collection effort for Factors 2 and 3, an online survey was administered to Metro Transportation Operations Supervisors and Freeway Patrol Supervisors to determine the frequency of contact with Limited English Proficiency (LEP) individuals as well as to a broad range of Metro Employees who interact with the public and who likely interact with this population as well. Metro distributed a link to the online survey and it was in field from **June 19, 2019 to June 28, 2019**.

### **Survey Questions:**

1. Do you regularly encounter limited English-speaking members of the public as part of your job?
2. In a TYPICAL DAY, approximately how many riders/members of the public do you encounter?
3. Of these, approximately how many would you say are unable to communicate well in English?
4. How often do you TYPICALLY encounter riders/members of the public seeking assistance who are unable to communicate well in English?
5. What services or information are those limited English speaking riders/members of the public TYPICALLY seeking? (select all that apply)
6. Which of these languages do you recognize as being COMMONLY used by limited English speaking riders/members of the public you encounter? (select all that apply)
7. Of the languages you picked, which languages are most of your limited English-speaking riders/members of the public speaking? (select up to 3 choices)
8. For which of these language groups, if any, could Metro services be improved? (select all that apply)
9. In what specific ways would you suggest improving Metro services for limited English riders?
10. Can you speak well in any languages other than English?
  - 10.1. What other languages can you speak well? (select all that apply)
11. Do you regularly work in more than one area of greater Los Angeles?
  - 11.1. In what specific area of greater Los Angeles do you work?
  - 11.2. In what specific areas of greater Los Angeles do you work? (select all that apply)
12. What department do you work for?

### 2.3 LEP Individuals Self-Administered Survey

#### **Approach**

Sixteen (16) LEP focus group discussions were scheduled with community-based organizations, five interviews were conducted over the telephone, and one was performed in-person. A self-administered survey was completed by all attendees except for the telephone interviews, which were completed via telephone by the facilitator. The facilitator gathered the surveys to collect the data for this report on their Metro Usage, Metro Services and their Satisfaction with Metro. The survey was in English and translated during each session and consisted of 18 open and closed-ended questions. An employee of each CBO was asked to have an interpreter present to assist respondents in completing the survey for their language group.

The survey was administered after the group discussion or interview. The time frame for the focus groups from June 7, 2019 through June 28, 2019.

A total of 262 people completed the survey with representation from 29 languages in Los Angeles County.

#### **Findings**

LEP focus group participants take an average of 22 one-way trips per month on the Metro bus or rail. Survey respondents generally ride the bus more often than rail.

<b># of One-Way Trips per Month</b>	<b>Total</b>	<b>Bus</b>	<b>Rail</b>
N=	262	262	262
0	19%	16%	21%
1 – 3	10%	7%	13%
4 – 5	6%	7%	4%
6 – 10	7%	8%	5%
11 – 20	7%	12%	2%
21 – 50	5%	9%	1%
More than 50	2%	4%	1%
Mean	21.7	24.3	19.1
Approximately how many one-way trips do you take per month on Metro bus/rail?			
Base: Those who ride that form of transportation.			

Most LEP riders go shopping or run errands (58%) using Metro. High usage riders are more likely to commute between work and home as well as to go shopping/run errands. Males were more likely to use Metro for sports/social outings and recreation compared than were women.

	<i>Total</i>	<i>Total</i>
<b>Where Going</b>		
	N=	262
Shopping/Errands		58%
Home		51%
Sports/Social Outings/Recreation		33%
Work		27%
School		19%
Other		15%
No answer		1%
Please tell us where you are going when you are using public transportation. (Multiple responses were accepted)		

LEP riders give moderate scores for their satisfaction with the Metro bus (57%) and rail (39%). Top-2-box ratings are higher for bus than rail.

	<i>Total</i>
<b>Satisfaction</b>	
	N= 184
Metro Bus – top-2-box	57%
Metro Bus – mean score	3.7
Metro Rail – top-2-box	39%
Metro Rail – mean score	4.0
Using a scale of 1 to 5, please rate how satisfied you are with the public transportation you use...(5-point scale, 5=very satisfied, 1=very dissatisfied)	

Respondents also provide moderate top-2-box ratings for the ease of using Metro bus/rail, with Metro rail (59%) receiving more top-2-box ratings than the bus (57%).

	<i>Total</i>
<b>Easy/Difficult to Use</b>	
	N= 165
Metro Bus – top-2-box	57%
Metro Bus – mean score	4.0
Metro Rail – top-2-box	59%
Metro Rail – mean score	3.6
Using a scale of 1 to 5, please rate how difficult you find it to use the different public transportation. (5-point scale, 5=very easy, 1=very difficult)	

Less than one-third of LEP riders (30%) feel that their limited English skills contribute to the problems or difficulty they have with the Metro.

		<i>Total</i>
<b>Limited English Source of Problem</b>		
	N=	262
Yes		30%
No		35%
No answer		35%
Do you find that you have difficulty or problems using Metro because you speak a limited amount of English?		

Route Maps (35%) and Ticket Machine Instructions (24%) are the most difficult of transit information to understand among LEP riders. Less than one-quarter surveyed indicate Timetables (23%) and Station Announcements (21%) to be difficult to understand.

		<i>Total</i>
<b>Transit Information Difficult to Understand</b>		
	N=	262
Route Maps		35%
Ticket Machine Instructions		24%
Timetables		23%
Station Announcements		21%
Station Signs		17%
Other		4%
No answer		23%
Which, if any, of the following transit information do you have trouble understanding? (Multiple responses were accepted)		

Among the list of possible changes that could be made to improve LEP riders' transit experience: Signs, brochures and announcements in their native language, picture signs, multilingual phone lines, and translators (34%-33%). Each have the highest percentage for indicated improvement.

		<i>Total</i>
<b>Changes to Improve Transit Experience</b>		
	<i>Total</i>	
	N=	262
Signs, brochures and announcement in native language		34%
Picture signs		33%
Multilingual phone lines		33%
Translators		33%
Website supported by multilingual texts		19%
Other		3%
No answer		28%
What changes do you think should be done to improve your transit experience?		

The most important information for LEP riders to receive in their native language is: bus routes, bus fares, brochures on the bus, proposed service changes, via the newspaper, on the television and on the radio.

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**Importance of getting information from Metro in Native Language (Summary of Means)**

	<i><b>Total</b></i>
N=	262
Bus routes (where buses go)	4.1
Bus fares (how much it costs)	4.0
Brochures on the bus	4.0
Proposed service changes	4.0
In the newspaper	4.0
On the television	4.0
On the radio	4.0
Brochures in the community	3.9
Service Changes	3.9
Signs on the bus	3.8
Metro ticket office	3.8
Signs at the bus stop	3.6
Metro website	3.6
Metro Telephone Center	3.0

Using a scale of 1 to 5, please circle how important it is to you that you can get information or answers to questions about each of the following from Metro in your native language? (5=very important, 1=not at all important)

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A total of 29 languages were represented in this survey.

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**Native Language**

	N=	262
Japanese		14%
Mon-Khmer, Hmong (Cambodian)		13%
Spanish		12%
Mandarin (Chinese)		11%
Cantonese (Chinese)		10%
Korean		8%
Thai		8%
India (Hindi, Gujarati, Bengali, Urdu)		5%
Armenian		3%
Sub-Saharan Africa (Igbo, Ugandan, Swahili, Yoruba, Bini)		3%
Tagalog (Filipino)		3%
Portuguese		2%
Russian		2%
Native (Uto-Aztecan-Chemehuevi, Southern Paiute-Apache)		1%
Samoan (Polynesian)		1%
Vietnamese		1%
Persian		1%
Arabic		1%
French		1%
Dravidian		1%
		<b>Total</b>
		<b>101%</b>

What is your native language?

Base: Total

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Over half of LEP riders feel that they can read, speak, and understand English well. This is a higher proportion than what is seen in the LEP population in general and can be explained by the fact that we purposely set out to find representatives of each language group that could communicate the needs of themselves and their peers in a research setting. High usage riders provide directionally higher ratings for their English skills than those with lower usage.

		<i><b>Total</b></i>
<b>English Skills</b>		
	N=	262
Read – top-2-box		71%
Read – mean score		4.2
Speak/Understand – top-2-box		71%
Speak/Understand – mean score		4.0
How well do you read/speak/understand English? (5-point scale, 5=very well, 1=not at all well)		

The demographic profile of LEP respondents is diverse. Low usage respondents are more likely than high usage riders to have a driver’s license and have cars available to them. High usage respondents are more likely to indicate having under \$15,000 in total annual household income.

<b>Demographics</b>		
	<i><b>High Usage</b></i>	<i><b>Low Usage</b></i>
	<i><b>Total</b></i>	
	N=	262
<b>Gender</b>		
Male		28%
Female		53%
Left blank		19%
<b>Age</b>		
Under 25		2%
25 – 34		3%
35 – 44		2%
45 – 54		7%
55 – 64		15%
65 or older		37%
Left blank		34%
<b>Have a Valid Driver’s License</b>		
<b>Total = 194*</b>		
		*58%
Yes		
No		*42%

<b># of Cars Available in Household</b>	
None	27%
1	30%
2	20%
3 or more	10%
Left blank	13%
<b># of People Living in Household</b>	
1	30%
2	24%
3	12%
4	10%
5 or more	11%
Left Blank	13%
<b>Annual Household Income</b>	
	37%
Under \$15,000	
\$15,000 to \$24,999	10%
\$25,000 to \$49,999	8%
\$50,000 to \$74,999	8%
\$75,000 or more	15%
Left blank	22%

Language	Number of Bookings	% of Total No. of Bookings	Billable Units	Cost
<b>Service Type: UTI</b>				
Amharic	1	0.08%	7 Min	\$6.86
Arabic	8	0.63%	80 Min	\$78.40
Armenian	68	5.35%	702 Min	\$687.96
Bengali	1	0.08%	37 Min	\$36.26
Cambodian/Khmer	4	0.31%	31 Min	\$30.38
Cantonese	50	3.93%	483 Min	\$473.34
Farsi-Afghani	28	2.20%	346 Min	\$295.96
Farsi-Iranian Persian	10	0.79%	183 Min	\$179.34
French	21	1.65%	189 Min	\$185.22
Gujarati	1	0.08%	13 Min	\$12.74
Hebrew	1	0.08%	23 Min	\$22.54
Hindi	3	0.24%	20 Min	\$19.60
Indonesian	5	0.39%	16 Min	\$15.68
Italian	9	0.71%	105 Min	\$102.90
Japanese	59	4.64%	540 Min	\$529.20
Korean	360	28.32%	3,743 Min	\$3,668.14
Malay	1	0.08%	2 Min	\$1.96
Mandarin	389	30.61%	4,272 Min	\$4,186.56
Polish	3	0.24%	19 Min	\$18.62
Portuguese	7	0.55%	61 Min	\$59.78
Punjabi	1	0.08%	14 Min	\$13.72
Russian	104	8.18%	1,107 Min	\$1,084.86
Spanish	67	5.27%	901 Min	\$846.94
Tagalog	13	1.02%	109 Min	\$106.82
Thai	13	1.02%	123 Min	\$120.54
Vietnamese	43	3.38%	386 Min	\$378.28
Yiddish	1	0.08%	1 Min	\$0.98
<b>Total Languages</b>	<b>Total Number of Bookings</b>		<b>Billable Units</b>	<b>Total Cost</b>
27	1,271		13,513 Min	\$13,163.58

**Grand Total**

	<b>Total Number of Bookings</b>		<b>Billable Units</b>	<b>Total Cost</b>
	1,271		13,513 Min	\$13,163.58

Language	Number of Bookings	% of Total No. of Bookings	Billable Units	Cost
<b>Service Type: UTI</b>				
Amharic	4	0.26%	46 Min	\$45.08
Arabic	12	0.78%	123 Min	\$120.54
Armenian	61	3.96%	637 Min	\$624.26
Bengali	5	0.32%	46 Min	\$45.08
Burmese	1	0.06%	25 Min	\$24.50
Cambodian/Khmer	4	0.26%	38 Min	\$37.24
Cantonese	81	5.26%	878 Min	\$860.44
Creole	1	0.06%	2 Min	\$1.96
Dari/Farsi-Afgh	1	0.06%	22 Min	\$21.56
Farsi-Afghani	23	1.49%	262 Min	\$256.76
Farsi-Iranian Persian	30	1.95%	343 Min	\$336.14
French	10	0.65%	122 Min	\$119.56
Hebrew	1	0.06%	16 Min	\$15.68
Hindi	1	0.06%	9 Min	\$8.82
Hungarian	1	0.06%	10 Min	\$9.80
Indonesian	1	0.06%	11 Min	\$10.78
Italian	2	0.13%	12 Min	\$11.76
Japanese	76	4.94%	878 Min	\$860.44
Korean	491	31.90%	5,473 Min	\$5,363.54
Mandarin	493	32.03%	5,698 Min	\$5,584.04
Mongolian	1	0.06%	4 Min	\$3.92
Polish	1	0.06%	2 Min	\$1.96
Portuguese	14	0.91%	95 Min	\$93.10
Russian	95	6.17%	903 Min	\$884.94
Spanish	51	3.31%	874 Min	\$821.56
Tagalog	12	0.78%	119 Min	\$116.62
Taiwanese	1	0.06%	19 Min	\$18.62
Thai	13	0.84%	117 Min	\$114.66
Tigrinya/Eritrean	1	0.06%	12 Min	\$11.76
Vietnamese	51	3.31%	634 Min	\$621.32
<b>Total Languages</b>	<b>Total Number of Bookings</b>		<b>Billable Units</b>	<b>Total Cost</b>
30	1,539		17,430 Min	\$17,046.44

## Grand Total

	<b>Total Number of Bookings</b>		<b>Billable Units</b>	<b>Total Cost</b>
	1,539		17,430 Min	\$17,046.44

Language	Number of Bookings	% of Total No. of Bookings	Billable Units	Cost
<b>Service Type: UTI</b>				
Amharic	4	0.49%	30 Min	\$29.40
Arabic	2	0.24%	16 Min	\$15.68
Armenian	49	5.95%	585 Min	\$573.30
Cambodian/Khmer	1	0.12%	2 Min	\$1.96
Cantonese	50	6.07%	740 Min	\$725.20
Farsi-Afghani	9	1.09%	87 Min	\$85.26
Farsi-Iranian Persian	9	1.09%	97 Min	\$95.06
French	8	0.97%	84 Min	\$82.32
German	2	0.24%	41 Min	\$40.18
Greek	2	0.24%	24 Min	\$23.52
Hindi	1	0.12%	25 Min	\$24.50
Italian	3	0.36%	34 Min	\$33.32
Japanese	35	4.25%	369 Min	\$361.62
Korean	284	34.47%	3,211 Min	\$3,146.78
Mandarin	243	29.49%	2,935 Min	\$2,876.30
Nepalese	1	0.12%	13 Min	\$12.74
Portuguese	4	0.49%	31 Min	\$30.38
Russian	60	7.28%	705 Min	\$690.90
Spanish	11	1.33%	209 Min	\$196.46
Tagalog	7	0.85%	84 Min	\$82.32
Thai	5	0.61%	59 Min	\$57.82
Tigrinya/Eritrean	2	0.24%	34 Min	\$33.32
Urdu	1	0.12%	4 Min	\$3.92
Vietnamese	31	3.76%	398 Min	\$390.04
<b>Total Languages</b>	<b>Total Number of Bookings</b>		<b>Billable Units</b>	<b>Total Cost</b>
24	824		9,817 Min	\$9,612.30

**Grand Total**

	<b>Total Number of Bookings</b>		<b>Billable Units</b>	<b>Total Cost</b>
	824		9,817 Min	\$9,612.30

		Fiscal Year 2017			Fiscal Year 2018			Fiscal Year 2019		
Spanish Calls Answered		Customer Relations	Customer Information	TAP Information	Customer Relations	Customer Information	TAP Information	Customer Relations	Customer Information	TAP Information
JUL		626	18,291	1,583	461	15,116	1,499	541	13,877	2,332
AUG		733	18,812	2,158	454	16,807	2,026	603	15,279	2,715
SEP		615	16,564	2,034	506	15,063	1,802	539	13,653	2,122
OCT		518	17,369	1,807	615	15,296	2,023	621	14,540	2,473
NOV		486	16,033	1,841	523	14,927	1,745	542	13,198	1,919
DEC		528	15,380	1,513	568	14,832	1,417	525	12,117	1,575
JAN		513	15,115	1,902	550	14,825	1,918	603	12,926	2,074
FEB		478	15,077	1,742	503	13,412	1,753	506	12,045	1,659
MAR		597	17,580	2,035	553	14,391	1,730	542	14,277	1,880
APR		470	15,852	1,572	569	14,562	1,900	567	14,163	1,944
MAY		503	16,070	1,906	497	14,271	1,725	574	13,820	1,878
JUN		494	16,390	1,639	500	14,844	1,488	630	14,489	2,089
Total by Group		6,561	198,533	21,732	6,299	178,346	21,026	6,793	164,384	24,660
Percent by Group		10.7%	9.3%	12.2%	10.8%	9.7%	11.2%	10.2%	10.0%	12.0%
Total All Groups				226,826			205,671			195,837
Percent All Groups				10.6%			11.0%			11.4%

## 2.4 Factor 2 Conclusions

There are several conclusions that can be made from the survey results: A total of 831 surveys for Metro employees were completed, with approximately 34% indicating they have frequent contact with LEP individuals. . The results are presented below:

- Metro employees/staff have varying experiences with LEP individuals in a typical day.
- Metro employees/staff encounter less than 10 LEP riders a day ( 45%), and 30% percent encounter between 10-50 LEP riders each day.
- Metro employees/staff frequently experience LEP riders/members of the public who are seeking assistance.
- Reported that they interact with LEP individuals daily who are seeking assistance.
- 29% on route information/wayfinding, 15% on fares, and 15% on schedules are the most common types of information LEP individuals are seeking from Metro employees/staff.
- Most Metro employees/staff have the ability to speak another language other than English, however, it was suggested that Metro have conversational classes on the most popular languages, so they are able to answer simple questions like giving directions. Most bus riders want to know the name of the next stop. It was suggested to have more bilingual staff in field positions.
- The most frequently suggested improvements by Metro employees are posters/signage/brochures and service change announcements in more languages or the top 5 languages, and more bi-lingual employees that speak Mandarin, Cantonese, Vietnamese, Thai and Cambodian. Also, a suggestion to bring back the television screens on bus and rail to provide announcements in different languages.

- LEP riders take the Metro bus or rail frequently (an average of 22 one-way trips per month), with the bus being taken more often than the rail.
- 24% of LEP riders take the bus at least once per month compared to 19.1% who take the rail at least once per month.
  
- The most common destination respondents go to using Metro bus/rail is for shopping or running errands (58%).
- Not surprisingly, high usage riders report using Metro bus/rail to go shopping/run errands, to travel home (51%) and to go to work (27%.) We hypothesize that they do so, more than low usage riders ,because they are familiar with the system and routes and it becomes second nature to not drive their cars for shopping trips.
  
- Satisfaction with Metro:
  - 57% of LEP riders are satisfied with Metro bus compared to 39% who are satisfied with Metro rail.
  - 57% of LEP riders that find it easy to use Metro bus, while 59% rate Metro rail as easy to use.
  
- Approximately one-third of LEP riders (35%) do not feel that their limited English skills make it difficult for them to use Metro. However, 29% state it is a problem. Respondents provide a high top 2 box rating for reading (71%) and speaking/understanding (also 71%). (These seem high; they may be inflated due to wishing not to self-identify as illiterate.)
  
- The top surveyed Metro changes that would improve the LEP rider’s experience are translated; signs, brochures, and announcements (34%), and picture signs, translators and multilingual phone lines (all 33%).
  
- The most important information to receive and view in their native language; bus routes, bus fares, brochures on bus, proposed service changes, in the newspaper, on television, and on the radio.

Metro also analyzed the calls received through the Language Assistance Line from January 1, 2017 through June 30, 2019. The reports are included in this section. The Metro Call Center has bilingual representatives and thus, Spanish calls are handled with Metro staff rather than the Language Assistance line. The Spanish calls received through the Metro Call center represented approximately 11% of all calls received. The call analysis supported the languages that Metro had previously identified. The languages that consistently had the highest number of calls for each of the three years analyzed were:

- 1) Spanish**
- 2) Korean**
- 3) Chinese (Mandarin/Cantonese)**
- 4) Russian**
- 5) Armenian**
- 6) Japanese**
- 7) Vietnamese**

### Factor 3 Analysis - Access the Importance of Metro’s Programs, Activities or Services

To ascertain the nature and importance of Metro to the lives of LEP individuals, a series of qualitative in-person discussions and/or interviews were conducted.

#### Qualitative Discussions and Interviews

##### 3.1 Approach to Qualitative Discussion and Interviews

In an effort to hold discussions, either as a focus group or individual interview, with as many of the language groups represented in Los Angeles as possible, the project team reached out to community-based organizations and churches associated with the most common LEP language groups. Over 80 organizations were contacted via email, phone calls, and voice messages inviting them to participate in this research effort.

A total of 15 focus groups were organized representing 15 of Los Angeles’ most-encountered LEP language groups. All 15 groups were held at community organizations or ethnic restaurants in Los Angeles County. An interpreter was present at each discussion group, and heavily relied on.

Focus groups ranged in size from 3 to 37 participants, lasting from 30 to 90 minutes depending on attendance. All participants received a weekly Metro tap card for attending. (Twelve of the participants chose not to receive one because they have a monthly senior pass.) Additionally, a donation was made to each community-based organization that assisted us in this effort ,with an additional donations to the CBOs providing an in-house translator.

Members of seven language groups were interviewed in-person or by telephone and completed the survey. All of those in the focus groups/interviews felt valued that their input was important and that it would be shared with Metro and DOT.

262 people were interviewed or participated in a focus group discussion translated in the languages listed:

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	<b>N=</b>
<b>Native Language</b>	
Spanish	35
Arabic	1
Armenian	9
Persian	1
Japanese	37
Korean	22
Tagalog	9
Vietnamese	3
Samoan	1
Cantonese	23
Mandarin	30
Thai	21
French	2
<i>*Hindi (and related)</i>	9

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*Dravidian	1
*Gujarati	2
*Urdu	1
Portuguese	6
Russian	6
<i>Other East Southeast Asian:</i>	
Hmong (Cambodian)	1
Khmer (Cambodian)	33
<b>**Sub Saharan Africa:</b>	
**Swahili	2
**Ugandan Local	1
**Yoruba	3
**Bini	1
**Igbo/Nigeria	1
Indonesian	1
Native:	
***Southern Paiute Apache	1
***Uto-Aztecan Chemehuevi	2
Indonesian	1

The Community Connections team of four moderated the focus groups. A discussion guide was used by each facilitator to insight discussion for a solid qualitative analysis. The primary areas covered in the focus group discussion were; Metro usage, Metro Services and Satisfaction with Metro.

### 3.2 Summary of Qualitative Discussions and Interviews

The majority of the LEP population that attended were seniors, because they are more than likely to be limited English speakers. Most depend on Metro bus transportation to get around town to go shopping, run errands, visit relatives, to get to and from doctor and dentist appointments, and to attend some recreation/sports events. Most of the male participants use rail to ride to and from work and to attend recreation and sports events.

The individual interviews of 7 LEP residents varied in Metro usage because of the age difference. Those under 25 were savvy in riding both bus and train because they own a smart phone and have easy access to determine point of destination, in comparison to a senior interviewed that owns a car, drives the freeways but has no desire to ride Metro bus or rail because she feels it is too complex of a system and fears the unknown.

The majority of the LEP participants felt that Metro does not do a good job in getting information to the communities in their language, for the purpose of attending informational meetings on transportation projects. Many participants that speak Mandarin, Cantonese, Thai, Korean and Japanese felt that Metro should translate informational literature into their native language. Comments from most focus group participants with the exception of Hindi speakers struggled with not knowing where to access information in their native language. The majority would like to see Metro drop off information in their language at community non-profit organizations.

Most of the seniors mentioned the difficulty in hearing station announcements, announcements made by the bus driver, and bus drivers not understanding them. LEP persons take the bus more than rail however visual aids would be appreciated.

Those with limited English skills were primarily those who speak Thai, Cambodian, Cantonese, Mandarin, Vietnamese, Korean, and Russian. Because of their limited English skills, these groups are reluctant to travel to new locations, especially recreation trips, because of their concern of getting lost.

The senior population struggles to understand their point of destination because they do not own a computer or a smart phone to access routes on the Metro web site. Many stated that Metro's hard-copy materials translated into their language would be the most helpful.

The Metro employees surveyed and LEP focus group participants agree that it is critical that Metro do more to outreach to them. It was also suggested that Metro hire more community outreach workers, bilingual bus drivers or those that know conversational Mandarin, Cantonese, Thai, Armenian, Korean, Japanese and Cambodian. LEP participants mentioned in all 15 focus groups conducted that Metro should provide enhanced outreach to Community Centers, Senior Centers, Social Service/Health & Wellness Centers, and Cultural Centers to drop off literature in their native language and provide information meetings with community outreach workers.

Visual materials in their native language are all tools that would improve connectivity to Metro and increase ridership because the riders will feel comfortable, and no longer feel scared about getting lost on the Metro transportation system.

Many Chinese LEP focus group participants mentioned that bus drivers are rude, they do not stop for them at bus stops, and if their tap cards are short funds by a few cents they are told to get off. These types of concerns may be alleviated once the community information meetings take place throughout Los Angeles County because the LEP rider may be misconstruing what they believe to be rude drivers, when the driver just does not know their language, or they do not stop for them at the bus stop.

### **3.3 Language Group Detail**

It is important to note the reason for conducting 2 focus groups in the Spanish Language LEP Communities was because they are the largest populous in Los Angeles and the largest Metro ridership language group. The largest sector of East Los Angeles and the South Bay region were chosen to have a focus group. Also, the Mandarin and Cantonese languages of the Chinese communities were conducted separately as well and the Community Connections team choose two distinct areas, DTLA-Chinatown and Monterey Park in the San Gabriel Valley with heavy concentration of these language groups.

#### **Spanish Language Community**

The Veterans Chamber of Commerce is an organization that promotes local engagement and located in the East Los Angeles area across the street from the Metro Gold line station. Ten participants, 1/3 limited English proficiency Spanish participated. Community Connections representative provided translation for the discussion guide questions and survey.

#### **Metro Usage**

A minority of the individuals own cars and the majority use both bus and rail during the week and weekend for visiting family and friends, shopping, doctor visits, and recreation in the Los Angeles area.

#### **Metro Services**

All participants responded, "No," to the interaction with any of Metro's Services and none of the participants have been invited to a Metro information meeting. Some believe this is due to the language barrier and others to the lack of information materials. None of the participants have heard about any plans for Metro projects.

#### **Satisfaction with Metro**

Primarily participants were not satisfied with their safety in riding the bus and train, and at bus stops. Two of the seniors felt the cost was too high for seniors to ride both bus and train, and the majority felt it extreme difficult and very confusing to plan their bus/rail route and that drivers were less friendly due to language barriers. One participant mentioned it is less expensive to drive his car and easier and faster to get to his destinations and that public transportation takes twice as long from home to work and that there are not enough buses or Metro trains to get to his final destination.

Suggested improvements for improved ridership and satisfaction would be to hire Spanish speaking driver and security officers and to have materials readily available and customer service representatives at key locations. Half of the attendees do not have access to computers and 1/3 do not own cell phones.



### **Spanish Language Community (2)**

The Southern California Inka Lions Club is an organization that is part of the Lions Club International with the mission to empower volunteers to serve their communities, meet humanitarian needs, encourage peace and promote international understanding through Lionism. The Southern California Inka Lions Club is located in the South Bay area in the District 4 – L3 of the Lions Club which covers the following area: Malibu, Pacific Palisades, Santa Monica, West Los Angeles, Hollywood, West Hollywood, Studio City, Beverly Hills, Culver City, Marina del Rey, Playa del Rey, Inglewood, Huntington Park, Vernon, Compton, Carson, El Segundo, Manhattan Beach, Hermosa Beach, Redondo Beach, Torrance, Gardena, Hawthorne, Lawndale, Lomita, Palos Verdes Estates, Rancho Palos Verdes, Rolling Hills, Rolling Hills Estates, Harbor City, San Pedro, Wilmington and Catalina Island.

The organization scheduled a total of 22 participants, some of them with extremely limited English proficiency. The bilingual group leadership and our team facilitator provided interpretation and translation for the discussion guide, questions and survey. We found that most of the participants were seniors and LA Metro bus or train riders.

#### **Metro Usage**

A minority of the individuals own cars and the majority use both bus and rail during the week and weekend for visiting family and friends, shopping, and recreation in the South Bay and Los Angeles areas.

#### **Metro Services**

All participants responded, "No" to the interaction with any of Metro's Services and all 22 have never been invited to a Metro information meeting. They believe this is due to the lack of sufficient information materials in Spanish, but mostly due to a nonexistent outreach to the Spanish community with no information about Metro and its services disseminated to the Spanish community in Los Angeles County.

Participants mentioned that their native language service count is represented and many of them mentioned they have issues recharging their tap cards and that the instructions were not clear. Also, none of them knew about the emergency tow service in the freeways from LA Metro.

#### **Satisfaction with Metro**

Primarily participants were not satisfied with their safety in riding the bus and train, and at bus stops. They are also not satisfied with the cost for seniors to ride both bus and train, the extreme difficulty with scheduling their bus/rail route, friendliness of drivers due to language barriers, and being judged indifferent due to not speaking English. Their suggested improvements for improved ridership and satisfaction would include more bilingual Spanish speaking drivers, additional security, having materials readily available in Spanish and bus kiosks translated in their language so they can plan trips with less difficulty.

It was also found that many of them did not know where to buy the Metro tap cards and requested more information. It is important to mention that some of the participants use the ACCESS service as well and that service needs to be improved significantly and their experience riding ACCESS is not the best.

### **Armenian/Persian Language Community**

The Armenian Society of Los Angeles, formerly the Iranian/Armenian Society of Los Angeles is located in Glendale and was established in 1956 with over 1500 members. The City of Glendale has the largest Armenian population in Los Angeles. Most of their members are Armenian speaking with some that speak Persian, Iranian, Farsi and French.

Nine of the 11 participants spoke Armenian, one spoke Persian, Armenian, Russian, and French, and one spoke Mandarin. The Mandarin speaking participant was in his twenties and an employee of an Armenian gentleman that participated.

### **Metro Usage**

10 of the participants own a car and use their car all the time due to . One participant uses the Metro bus 780 everyday, however he was the Mandarin speaking guest. They also do not use Metro bus or train because the routes are “weak”, the parking is limited and it is a force of habit for them to use their car.

### **Metro Services**

One of the participants has received a Metro pamphlet via US mail and only one participant has heard of a Metro project ; he is on the Glendale city council and was invited by the Executive Director to participate. He has a radio show in Armenian that he would like to share Metro information with his community on-air because all the attendees did not know how to access routes on-line due to the fact that they would like information in their language. They would also like to receive information in their language at this non-profit address since they are there often for meetings.

### **Satisfaction with Metro**

Two of the participants mentioned they are satisfied with the train system. One of them likes to go to DTLA because it is easier to attend meetings he has there when he does not have to fight the traffic or pay for parking and the other attendee mentioned that her son takes Metro for everything he does and shared his satisfaction because he does not have to worry about having a car and it makes his life easier. Most of the participants felt in order for them to consider using Metro bus or train they would have to receive materials in their language as well as using bus wraps in their language where Armenians live, have bus stops closer to certain residential areas, provide training for the elderly, provide voucher for the homeless and less privileged.



### **Japanese Language Community**

The East San Gabriel Valley Japanese Community Center is an organization that serves the community through social services, artistic, recreational, and educational programs. The organization scheduled a total of 37 participants with extremely limited English proficiency seniors. Interpreters and translation were utilized for the Discussion Guide and survey.

#### **Metro Usage**

A total of 19 individuals own cars and the minority use both bus and rail during the week and weekend for purposes of shopping, eating, and recreation in the San Gabriel Valley.

#### **Metro Services**

Majority of participants responded, "No" to the interaction with any of Metro's Services. One individual had been invited to a Community event by Supervisor Hilda Solis. In addition, some individuals use Foothill Transit within the area and transfer to Metro bus and rail for trips outside of the City.

#### **Satisfaction with Metro**

Primarily participants are somewhat satisfied except for problems with TAP cards, understanding bus schedules, routes and transfers and parking/pricing at Bus stations. The suggested improvements for ridership include clarity with fares, improved security, materials and bus schedules in Japanese, and additional bus frequency with routes.

### **Korean Language Community**

(FACE), Faith & Community Empowerment is a non-profit organization located in Koreatown, the largest Korean community in the USA. FACE provides civic engagement, public-private partnerships, and serving as a social justice community advocate while strengthening church and community partnerships. Many Koreans have limited opportunities to get hired in the corporate world and resort to becoming a small business owner.

#### **Metro Usage**

A total of 20 individuals out of the 21 participants own cars, and 16 use bus and rail for shopping/errands, home and work, sports and entertainment one to three times per month. The participants do not use it more than a few times per month because they do not know how to use it and are afraid they will end up at a destination that is not familiar. They also mentioned that Metro does not go everywhere they would like it to go and believe it will take them longer to get to their destination than using their car.

**Metro Services**

All of the participants have never heard of any of Metro's projects and have never been invited to participate in an informational meeting. 4 of those in attendance have used the Metro Freeway Service Patrol. Many rate Southern California Edison (a public utility) over Metro because their website is in their language and less intimidating and easier to navigate.

**Satisfaction with Metro**

Participants were satisfied with the convenience of using Metro saying that their ride is faster than driving and less expensive than Uber. They enjoy the fact that they do not have to drive, less stressful with the traffic and they can work while on the train. They would like to see more information in their language on the website and on electric signage. They would also welcome Korean speaking outreach Metro consultants and to have information dropped off at Korean non-profit organizations. They believe they would use Metro rail more if there were vans or shuttles provided by Metro to pick up individuals at various locations (similar to Uber and Lyft) and take them to Metro stations. Also, if you had non-official stops for those with disabilities or in a wheelchair, so they would not have to walk too far. It was also mentioned that they hesitate to use Metro because of the service hours.

**Tagalog Language Community**

NAAC, National Asian American Coalition is a HUD approved non-profit housing organization with offices in Los Angeles, San Diego, San Francisco and Las Vegas, representing the Filipino community and advocating for homeownership affordability, for greater economic growth focusing on the underserved communities and for small business development. The focus group of 10 was conducted in Torrance at one of their sister offices. The participants consisted of 8 Filipinos with their native language being Tagalog and 2 attended with Spanish as their native language.

**Metro Usage**

A total of 8 own cars and 3 use public transportation (bus and rail). One attendee has used Metrolink, two use the Long Beach system, Torrance Transit and Montebello bus lines. Those that do not use bus or rail say they do so due to safety issues and/or they own a car and feel there is less worry driving than looking up destination points and the wait.

**Metro Services**

One attendee uses Metro bus and rail one time per week and another uses it every day for school, work and shopping. Two of the attendees have used the Freeway Service Patrol and were not aware that it was a Metro service. Two have been invited to information meetings specifically for the 710 expansion and the Boyle Heights Bridge projects.

**Satisfaction with Metro**

Five of the attendees were satisfied with Metro bus system because they "look nice", they like the transit application, and none have found issues specific to their native language. One of the attendees enjoys taking the Metro Gold Line to DTLA because he skips the traffic jams without headache. None have found issues specific to their native language. However, their concerns are that it is not easy to purchase a tap card, and they would like to see a station in Torrance. They also fear for their safety, say that bus drivers are not friendly and do not drive safely in the Long Beach (Long Beach Transit) and Torrance (Torrance Transit) areas.

### **Vietnamese Language Community**

The National Asian Pacific Center on Aging is a non-profit located in DTLA in Chinatown. They voice the AAPI older adults and their families as leaders in the areas of healthy aging, mature workers, and the prevention of elder abuse.

#### **Metro Usage**

One participant out of the three owns a car and they all have used the bus for recreation, to go to the Arcadia mall for shopping, and one to go to work. One of the participants uses rail to visit Long Beach for recreation. One of the participants only uses the bus; she is afraid to ride the Metro train because she is unaware of how to ride it and feels she will get lost.

#### **Metro Services**

None of the participants has ever received an invitation to attend a Metro transit project meeting or informational meeting and has never had any interaction with Metro in any way other than to ride the bus or train and purchase their senior pass. They do like taking the LA DASH because of the convenience and the cost is very low.

#### **Satisfaction with Metro**

All three attendees were satisfied with Metro but would ride rail more often if it was easier to understand the routes. They also would like to see information booths with someone that can speak their language, to access reduced rate passes. More Vietnamese drivers as well; they do see Chinese drivers on bus route 70. Bus route signs would be helpful in their native language as well as materials and having them readily available in all languages at senior centers and where they purchase Metro passes.

### **Samoan Language Community – Interview**

New Vision Church located in Garden Grove serves Polynesian (Samoan) communities from Orange County and Los Angeles County. Many of their members live in the Westside Long Beach area close to Santa Fe and Wardlow, the site of a large Samoan community. New Vision Church is one of the few churches that serves this community, and this is the reason many of their members travel from Long Beach to attend weekly bible studies and Sunday services. Interpreter was not needed for the gentleman that participated in the phone interview. He was able to arrive at the Garden Grove church after taking two Metro trains and one Orange County bus. He is bilingual in Samoan and English. His parents and older family members still speak Samoan.

#### **Metro Usage**

His family owns a car however he uses Metro train on a daily basis for work and to go to church. He also uses the Long Beach Transit.

#### **Metro Services**

The interviewee has used the Freeway Service Patrol and the Metro Lost & Found. He has never been to an information meeting for a highway or transit project or contacted about a transit project. He feels that the trash hauler in the Long Beach gives out better information in his native language compared to Metro.

#### **Satisfaction with Metro**

Interviewee is very satisfied with Metro bus and rail because it is convenient for him, the ride is usually on time and it takes him only 34-40 minutes to get to work from Long Beach to DTLA; if he drove his car it would be a much longer ride. He was happy with the friendly drivers but not happy with breakdowns on both bus and rail. He said that his limited English proficient family will not ride Metro unless he accompanies them because they feel lost and afraid of using a system that does not have materials or bus signs in their native language. Also it is also hard to understand the intercom system, and tap cards are hard to read. He would like to see more apps with maps to view when the bus or train is going to arrive.



### **Cantonese Language Community**

The Chinatown Service Center provides services for the Cantonese community in social services, a youth center, medical and dental clinic, child development, economic development and affordable housing services. 25 Cantonese speakers attended the focus group at the Chinatown Service Center located in Chinatown in DTLA and utilized 2 in-house interpreters.

#### **Metro Usage**

All 25 attendees were seniors and do not own a car. Seventeen of the participants ride Metro bus and rail as well as Metrolink and the DASH, 7 use it weekly, 2 use it monthly, and the rest use it sporadically. Most use it for shopping and visiting family. Those that do not use it do not have a tap card for seniors because they are unaware of how to purchase it. Those that do use it say it is easy for them to go to Union Station to purchase a tap card because it is within blocks of where they live.

#### **Metro Services**

None of the attendees have ever interacted with Metro or have been contacted about a transit project or attended an informational meeting. They have used Metrolink and the DASH.

#### **Satisfaction with Metro**

About one fourth of the attendees voiced positive opinions regarding the convenience of using Metro bus and rail, the friendliness of the drivers and the ease of DTLA routes. However, the concerns outweighed the positive, like long waits outside of the DTLA area, bus drivers not stopping for them at bus stops, language barrier of bus drivers, signage not in their native language, the lack

of benches at bus stops in Torrance and no restrooms close by, they do not find information put out by Metro to be useful, and they do not understand it. Only 4 of those in attendance own a smart phone so it is hard for those without a phone to understand destination points or to visit new places like the beach. Over half of the attendees are happy with their electric, gas, trash pickup and mail service and the information they receive in their native language compared to that of Metro.

### **Mandarin Language Community**

Twenty-eight Mandarin speaking Chinese seniors attended the focus group at the Center for the Pacific Asian Family in Monterey Park in the San Gabriel Valley. The region has achieved international prominence as a hub of overseas Chinese.

#### **Metro Usage**

Five of the 28 attendees own a car and 24 use bus and 6 use rail; 12 attendees use it weekly, 1 daily and 4 monthly, the others use both sporadically, with the majority using both to go shopping, visit relatives and to doctor appointments. Only one attendee does not use either, because he drives his car.

#### **Metro Services**

Five of the attendees use the bus station to purchase their tap cards. None of those in attendance have been to an information meeting and have never been contacted about a transit project. The other bus systems that they have used is Access and Spirit.

#### **Satisfaction with Metro**

They believe that the public transportation in their area is very good especially in the City of Montebello, however they still have many concerns. They would like to see materials dropped off at the center in their native language so they could travel more often. Many of the bus drivers do not stop for them when they see them at bus stops and sometimes drop them off far from the sidewalk. Destination notices in their language would be helpful. Many times they asked drivers for the name of the next bus stop and the driver did not understand them. They would like to see those with wheelchairs to be helped out more.

### **Thai Language Community**

Los Angeles has the largest Thai population outside of Asia and the Thai Community Center of Los Angeles is the only bilingual and bicultural services center available to meet the greatest needs in Thai community. They provide human rights advocacy, affordable housing, and promote small business, neighborhood empowerment, social enterprises and access to healthcare. The focus group was scheduled at one of their housing facilities for seniors in Sun Valley with 21 participants.

#### **Metro Usage**

Out of the 21 that participated 8 own a car and 14 ride bus and rail; the majority use both 2-3 times per week for shopping, recreation and visiting family. The 7 that do not use bus or rail report that they do not know how to use it and are unaware how to get to point of destination because they do not have a computer or a smart phone, and have never seen Metro materials in their native language. Another participant mentioned they would use it more if they did not have to wait so long for arrival of the bus or train.

#### **Metro Services**

The only interaction 3 members of this group has had with Metro is with the Freeway Service Patrol. None of the participants have heard of any Metro transportation projects or participated in an information meeting. The group has used the local bus system Access and Uber.

#### **Satisfaction with Metro**

A few of the participants expressed that they are happy with the bus drivers and enjoy the air-conditioned ride. However, the majority say it is difficult to understand the routes and linking them to more than one destination point like the beach. Also, they have not seen material in the Thai language and it is hard for them to find out where to access the materials. It was suggested that materials be dropped off at their center. They are unhappy with the waiting time and distance to get to bus station from home, drivers do not understand their language and do not know where to purchase tap cards and suggested kiosks in local grocery stores.

Majority are very happy with the materials put out by the gas and electric company in their language because it comes included in their statement when compared to receiving Metro materials in their language.

#### **French Language Participation (Interview)**

Interviewed in-person a French language individual using the LEP Discussion Guide and LEP Survey at 1425 Artesia Blvd., in Gardena, her native language is French and Spanish, however she does speak English.

#### **Metro Usage**

The participant interviewed has never used a Metro bus or train, is an owner of a car and drives the freeways. Participant did not know about the Metro emergency towing services for freeway users.

#### **Metro Services**

The participant responded, "No" to the interaction with any of Metro's Services ,has never been informed or invited to a Metro information meeting, and did not know about any of the Metro services.

#### **Satisfaction with Metro**

The participant suggested improvements to the public transportation in Los Angeles to reduce private commuting, reduce emissions, and increase ridership. For a satisfactory service, the participant suggested to include bilingual speaking drivers, additional security, materials readily available in both English/French and at bus kiosks translated language of the users, so they can plan trips with less difficulty.

#### **Indian Language Community (Hindi, Gujarati, Urdu)**

Facilitator met with the Global Peace Foundation, Inc. Their non-profit is located in Long Beach and they are committed to helping families in crisis, educating youth on the dangers of drugs/alcohol, and in creating a healthy global community free of hunger and abuse. Fourteen attended the focus group and about half were more comfortable having the information translated in their native language of Hindi. There was one speaker each of Gujarati and Urdu.

#### **Metro Usage**

11 participants own a car and 6 use public transportation of bus and rail. Some use Metro, Metrolink and OCTA from 1 to 2 times per week, and 2 use it twice per month. Those that do not use it say it is because it is too hard to understand the bus routes, they wait too long and they work close to home and use their car.

### **Metro Services**

Some have interacted with Metro via the internet to check rates, and no one was familiar with the Freeway Service Patrol. Only one participant attended a community event in the City of Cerritos regarding Line #32. And all but the one person, who uses OCTA service when in Orange County, have not interacted with any other transportation agency. They would like to see Metro materials in their native language.

### **Satisfaction with Metro**

They are satisfied with Metro and understand information that is put out. One participant's staff is highly satisfied. They would like to be invited to public information meetings and to have a shuttle service to the bus station. They would like to see more bus routes, especially in Cerritos. Also, materials translated in their native language and on PSA's, television, newspapers and information on the internet. They rate Metro with a 4 compared to other critical public services like gas and electric and gave them a 5 because of their translated materials. Trash pickup received a 3.



### **Portuguese Language Community**

The International Life Center is an organization that promotes local engagement and is located in the city of Paramount and covers the area of Paramount, Downey, Rosemead, North Long Beach, South Gate, Cerritos, Norwalk, Lynwood, Maywood and Bell. The organization scheduled a total of 6 senior participants some of them with extremely limited English proficiency with interpreters and translation utilized for the discussion guide questions and survey

### **Metro Usage**

Some of the individuals own cars and others use both bus and rail, during the week and weekend, for of visiting family and friends, shopping, and recreation. in the Long Beach and Los Angeles areas.

### **Metro Services**

All participants responded, "No" to the interaction with any of Metro's Services and all have never been invited to a Metro information meeting. They believe that outreach to the Portuguese community is nonexistent and not important to Metro.

### **Satisfaction with Metro**

Public transportation riders noted that were not satisfied with additional services provided by Metro such as ACCESS; they also mentioned that they were not satisfied with their safety in riding the bus and train, and at bus stops. They were not satisfied with information on how to add money to the tap card, the cost for seniors to ride both bus and train, the extreme difficulty of scheduling their bus/rail route, friendliness of drivers due to language barriers, and being judged indifferent due to not speaking English. Their suggested improvements for improved ridership and satisfaction would include bilingual Portuguese speaking drivers, additional security, having materials readily available in Portuguese and bus kiosks translated in their language so they can plan trips with less difficulty.

We also found that even though the LEP survey did not include any question regarding related services such ACCESS there was mentioned that the ACCESS service needs to be improved significantly.



### **Russian Language Community**

The Russian community is an active group in the City of West Hollywood including staff at City Hall and a Russian Advisory Group. There are approximately 4,000 Russian individuals living in the City which makes up 10% of the population. The Focus Group was conducted at Plummer Park with a total of 6 participants, all seniors.

### **Metro Usage**

A total of 3 of individuals own cars and all use both bus and rail during the week and weekend for purposes of visiting family and friends, shopping, recreation and running errands.

### **Metro Services**

Majority of participants responded, "No" to the interaction with any of Metro's Services. One individual had been invited to a Transit project meeting and a Community event. In addition, Cityline WeHo is the transit agency used for ridership within the area and riders then transfer to Metro bus and rail for trips outside of the city.

### **Satisfaction with Metro**

Primarily participants are somewhat satisfied with the exception of long delays, problems with understanding bus schedules and routes and homeless occupying bus stops and seats with their possessions on the bus and rail lines. The suggested improvements for ridership include materials

and bus schedules in Russian, additional outreach to the city regarding transit improvements and cleaner bus stops.

**Cambodian (Hmong, Khmer) Language Community**



The United Cambodian Community is an organization that promotes local engagement located in the Long Beach area. Cambodian Town District stretches from west at Cherry Avenue and Anaheim St. to the east just beyond Martin Luther King Jr. Blvd. The organization scheduled a total of 34 participants with extremely limited English proficiency seniors. Interpreters and translation was utilized to explain the Discussion Guide and survey.

**Metro Usage:**

A minority of the individuals own cars and the majority use both bus and rail during the week and weekend for purposes of visiting family and friends, shopping, recreation in the Long Beach area and Los Angeles areas.

**Metro Services:**

All participants responded, "No" to the interaction with any of Metro's Services. Mainly due to language barrier and lack of information materials and outreach to the Cambodian community.

**Satisfaction with Metro:**

Primarily participants are less satisfied due to safety concerns, price of ridership for seniors, difficulty with scheduling their bus/rail route, friendliness of drivers due to language barrier, and being judged indifferent due to lack of English. The suggested improvements for improved ridership and satisfaction would include Cambodian speaking drivers, additional security, materials and bus kiosks in Cambodian allowing less difficulty with planning trips.

**Sub-Saharan Africa: (Swahili, Ugandan Local, Yoruba, Bini, Igbo/Nigeria) Language Community**

The Adult Skills Center located in Lake Balboa had 9 participants for their focus group and spoke a total 5 different languages: Swahili, Ugandan Local, Yoruba, Bini and Igbo/Nigeria. The adult skills center provides education, job-training and independent living services to adults with intellectual

and developmental disabilities. The participants are employed with the non-profit to work with people that need translated services in the languages they speak.

### **Metro Usage**

All of the participants own a car and 7 of them take the bus and train and use it once per week for shopping, recreation, work and training. Those that do not use it or do not use it often is because they do not have the time to research routes and find it inconvenient. They are afraid to use the train to North Hollywood because it is not clean and there are suspicious looking riders that make it scary and unsafe for kids.

### **Metro Services**

Most have heard of the Freeway Service Patrol and 1 individual was invited to an information meeting regarding West Hollywood to Santa Monica. The other 8 have never been invited or their workplace has not received information for such. They use Amtrak and Metrolink.

### **Satisfaction with Metro**

The best part of Metro public transportation is the ride to DTLA, to Universal City Walk and to the Crenshaw area ; they find Metro information useful. They would like to see more routes to Sylmar after 8pm and after 10pm in Canoga Park. They would like to see more route availability during the holidays and bus routes on Parthenia Street in Northridge. There are over 2,000 languages spoken for Sub-Saharan Africa so they all believe that Swahili and French would be the best languages for Metro translation of their materials.

### **Native Language Community (Southern Paiute/Apache and Uto-Aztecan) Interviews**

Four Native Americans speaking two different native languages were interviewed via telephone. They are from the same family.

### **Metro Usage**

The 25-year-old male takes Metro bus and rail 36 times per month for work and home. The 50-year-old female interviewee, 51 year old interviewee and the other female interviewee own a car and they find it more convenient to drive, however they both take Metro rail and bus about twice per month for shopping, to work and back home.

### **Metro Services**

They all have used the Metro website and have seen Metro pictures and signage. They would like to see more station announcements and route maps with picture signs and website supported by multilingual texts. They feel that bus fares are very important and service changes and an easy to use website representing the Apache language. They all understand and read English as well but still speak their native language at home.

### **Satisfaction with Metro**

They are satisfied with Metro's bus and rail but, as was mentioned, they suggested more signage, a better website that is supported by multilingual texts, and better directions on how and when to use a transfer and how to purchase one.

### **Dravidian Language Community Interviewee**

Participant was not able to attend the Indian languages focus group but did participate in a phone interview. The majority of Dravidians are from south India and there are about 245 million native speakers of Dravidian languages.

#### **Metro Usage**

He rarely uses Metro because driving is more convenient. He has never been invited or has ever heard of any transportation projects underway with Metro. He does see from time-to-time construction going on.

#### **Metro Services**

He has never had to use any of Metros services. He has never been invited or has ever heard of any transportation projects underway with Metro. He does see from time-to-time construction going on.

#### **Satisfaction with Metro**

He has never researched materials in the Dravidian language put out by Metro and believes that his family and friends that speak the language would be better served with materials they understand and may consider using bus or rail in the future.

#### **Indonesian Language Community Interview**

The Indonesian community is represented by the Consulate General of the Republic of Indonesian. Most of the employees that work for the consulate are limited English speakers and one individual was interviewed and completed a survey. There are more than 700 languages spoken by Indonesians. This individual highly satisfied when using rail in DTLA where she lives but not so much in the suburban area due to long waiting periods.

#### **Metro Usage**

Metro bus and rail services are used about 20 times per month each. She owns a car; however her husband uses it and drops her off at work on occasion. Many of the individuals served by the consulate offices do arrive on bus since the office is located on Wilshire Street in Los Angeles. Some individuals have asked employees for help with routes because of the language barrier and inability to read English.

#### **Metro Services**

Interviewee has never heard of any Metro projects or been invited to a Metro information meeting. She has heard on occasion while watching the news several newscasts on some Metro issues like the buses that have caught fire or the closure of some streets.

#### **Satisfaction with Metro**

She is a loyal fan of Metro but the cleanliness of trains is an issue. She would a little more satisfied with Metro if there were materials in the Indonesian language for the people they serve, and wayfinding signs in multiple languages to make it easy to reach their destination points.

### **3.4 Factor 3 Conclusions**

The focus groups and interviews show it is critical for Metro to have an outreach plan to disburse information to the LEP community so they are not left in the dark about the bus and rail system. Many attendees of the focus groups would ride more in the future or start riding bus or rail, if they were educated on both. An LEP person has limited resources and many do not own a car, computer or a smart phone due to having a limited income. However, many of them gather information from their local community service organizations, consulate offices or senior housing facilities-where they live, which are the perfect venues for Metro to deliver informational literature as well as facilitate an information meeting at those locations. Training for community-based organization members on bus and rail routes so that the LEP individual is less afraid of riding Metro bus and rail. Maybe even tours could be scheduled with the CBO's for first time users and infrequent users to increase ridership.

In order to make their riding experience as seamless as possible they would like to see more station announcements and route maps with picture signs in their native language. The majority are satisfied with Metro even though they shared concerns with safety, homeless sleeping on the bus stop benches, bus driver rudeness, inability to find information in their native language, and fear of riding because they might end up at a location that is unknown to them.

Most participants rated gas and electric services with a rating of 5 (extremely satisfied) because they receive information in their native language with their monthly statement, and the websites for both are easy to access providing information in their language. The extremely limited English proficient participants that are low income, below the poverty level will never access the internet because of the reasons stated, unless the CBO have computers for their usage or they can possibly go to their local library to access the Metro website for route and tap card information.

In conclusion, based on the results of the 2019 Four-Factor Analysis, Metro will be translating Vital Documents as defined in the Language Assistance Plan in the following languages:

- 1) Spanish**
- 2) Korean**
- 3) Chinese (Including Mandarin and Cantonese)**
- 4) Japanese**
- 5) Armenian**
- 6) Russian**
- 7) Vietnamese**

Metro will continue to monitor the Language Assistance Plan and will provide any languages requested by the public which are not included in the seven languages determined by the Four-Factor Analysis.

**Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.**

The LEP needs assessment’s final factor looks at associated costs and resources available to deliver language assistance. This considers language needs identified in Factor 3 within the context of Metro’s available and projected resources to provide them. As part of this plan, Metro will continue to identify cost-efficient means of further accessibility of its information to LEP persons.

Metro communications staff revisited an audit of current customer information materials and programs. This audit identified the various *types* of information that Metro makes available to its customers, as well as the *channels* through which Metro distributes this information. It also identified costs associated with providing LEP-accessible information as well as cost-effective practices associated with providing that information.

***4.1 Current Information and Costs***

To begin determination of how information can best be made more accessible to LEP individuals, Metro staff first updated its earlier review of all types of information the agency currently provides to all customers. Staff then updated categorized channels through which this information is disseminated.

**Table 9** below identifies the types of information that Metro currently provides and correlates them with the channels through which they are made available. This chart applies to all information Metro provides to customers and stakeholders, including some in-language materials currently offered.

<b>Table 9. Types of Information Distributed via Available Channels</b>										
<b>Types of Information Distributed via Available Channels</b>	Basic Rider Info	Maps	TAP Info	Service Alerts	Service Changes	Safety and Security	Destination Info	Planning Info	Project Updates	Rights Notices
On-System Posters	X	X	X		X	X	X			X
On-System Handouts	X		X		X	X	X		X	X
On-System Signage			X	X	X	X				
Metro.net	X	X	X	X	X	X	X	X	X	X
Social Media	X	X	X	X	X	X	X	X	X	
Advertising					X	X	X		X	
Telephone Reps	X		X						X	
On-Site Reps			X			X				
Community Meetings		X			X			X	X	X
Board Meetings Transportation Blog (The Source/El Pasajero)	X	X	X	X	X	X	X	X	X	XX
TPIS				X	X					
TVMs			X							

## **Description of Categories:**

- **Basic Rider Information:** Instructions for using Metro's system and fares, including information on service types, trip planning resources, Transit Court and the Customer Code of Conduct.
- **Maps:** Geographic imagery depicting location and proximity of Metro lines, stations and stops, as well as amenities available at specific stations  
**TAP Information:** Applying for discounted fares and passes. How to purchase and load different types of fares and passes, use of fare system equipment, requirements for providing proof of fare and public hearing process surrounding fare changes.
- **Service Alerts:** Short-term service deviations from regular routes and schedules due to special events, maintenance/construction, police activity, etc.
- **Service Changes:** Twice-yearly updates to service (i.e. rerouting, increasing frequency) to improve service and overall system efficiency, and related public hearing process.
- **Safety and Security:** Instructions for safe behavior while in or near Metro facilities, including vehicles, stations and other equipment in operation adjacent to customer areas. This also includes some information provided through contracted services with LA Sheriff's Department.
- **Destination Information:** Highlights special events and attractions accessible on Metro's system.
- **Planning Information:** Studies, reports, renderings and other technical documents pertaining to Metro plans for system expansion and facility improvements.
- **Project Updates:** Status information on progress of Metro projects currently in development, including rail expansion and other improvements.
- **Rights Notices:** Per compliance with Title VI of the Civil Rights Act, this includes posted notices as well as corresponding complaint forms. Other customer consent and complaint forms are also included in this category.

## 4.2 Resources for Providing LEP Access

Metro's costs for providing LEP assistance are frequently embedded in other communication activities and therefore difficult to isolate and individually track. Below are the types of costs that may be typically incurred when providing LEP assistance:

- Translation/typesetting for customer communications materials/voiceover for Spanish and other language announcements
- Staff time for management of translated projects
- Bilingual/multilingual employees
- Printing and installation costs for bilingual/multilingual written materials and signage
- Live translation at public meetings
- Individual projects' outreach contracts for items above
- Telephone based interpretation services

In determining how to allocate its resources, Metro will be guided by the extent of the benefit of providing in-language resources compared to the resources needed to provide that assistance. For example, for documents outside of Tier 1 Vital Documents identified in section 5.4, additional translation or printing that will provide information to larger or more vulnerable populations is a more reasonable use of resource than incurring equal or greater costs for information that only benefits smaller or less transit-dependent groups. In all of these cases, methods for conserving resources will be considered so as to maximize reasonable provision of in-language materials where possible.

It should be noted that resources are not limited to fiscal means. For example, in situations with posted information, available physical space will also be viewed as a resource. When posting information for the benefit of comparatively small in-language populations, displacing or compromising the effectiveness of that same information for more populous groups must be a consideration.

### **4.3 Cost-Effective Measures**

To help maintain and increase efficiency around costs associated with providing LEP-accessible information, Metro will:

- Focus on providing quality information in the most prevalent languages, with remaining languages available upon request.
- Negotiate contracts for translation services to secure best available rate.
- Manage translation projects to maximize cost-effectiveness within vendor pricing structure.
- Utilize bilingual/multilingual employees in producing in-language materials and interfacing with LEP customers.
- Create materials that incorporate multiple languages to reduce material and printing costs.
- When available, target distribution of in-language information to geographical areas with LEP populations using Metro, generating savings on materials, printing and installation.
- Explore potential for repurposing materials currently used for ADA accessibility that may be used to also further access for LEP persons.

For new projects not included in top tier vital documents outlined in section 5.4, Metro will evaluate costs on an on-going basis to determine when language assistance can be reasonably provided. LEP rider informational needs found in Factor 3 will be considered in this process.

## 6. Language Assistance Plan and Measures

Up to the Fall of 2019, Metro's practice has been to provide the following in-language resources:

- Nearly all printed materials in bilingual English/Spanish, except for maps and select promotional pieces
- Civil Rights notices in vehicles and stations in Spanish, Chinese, Korean, Armenian, Vietnamese, Japanese, Russian, Khmer and Thai
- Language-less pictogram signage where possible in bus and rail stations, and on vehicles
- Rail station displays with basic rider instructions in Spanish, Chinese, Korean and Japanese
- Pocket guides with basic rider instructions in Spanish, Chinese, Korean, Armenian, Vietnamese, Japanese, Russian, Khmer and Thai
- Website landing pages with basic rider information and civil rights complaint forms in Spanish, Chinese, Korean, Armenian, Vietnamese, Japanese, Russian, Khmer and Thai
- Planning information translated to appropriate languages for projects in areas with concentrated in-language preferred communities and by request – in print and online
- In-language telephone assistance in Spanish, with other languages available through a third party live telephone interpreter service
- Transit news and information via our transportation blog that is translated in Spanish called El Pasajero.

Looking forward and reviewing findings from the four factor analysis, this section outlines languages to be used, determines the most needed information for LEP accessibility, identifies Vital Documents and outlines a plan for providing resources.

-Ridership demographics and focus groups conducted as part of Factor 3 were considered in determining the agency's translation threshold.

-Staff also conducted an evaluation of in-language assistance offering used since the last update of this plan, including web traffic to in-language pages, usage of live telephone interpreter service for customer information and popularity of translated handouts at select public meetings.

-Consideration of information types and distribution channels was included in review of LEP needs identified in earlier parts of this analysis, which allowed for narrowing focus to information whose reasonable provision could significantly improve access to information for LEP customers.

-Then analysis identified other critical steps to be taken in serving LEP customers. This included information types, related services and resources not specifically called out in Factor 3 that are nonetheless essential for improving LEP persons' access. This section also looks at processes and procedures that Metro can undertake to better serve LEP customers based on findings in Factors 2 and 3.

-Vital Documents are then identified in accordance with Title VI and Executive Order 13166 and Metro's Language Translation Threshold and a plan for providing specific documents and resources is outlined.

## Language Translation Threshold

Based on the Census demographic information figures collected in Factor 1, Metro has determined its greatest Language Translation Threshold as **Spanish**. Spanish is by far the largest language group in the region and the most common language for LEP Metro information requests. Spanish speakers account **10.29%** of Metro’s total stakeholders – far greater than any other language group. The next two largest groups of LEP stakeholders, **Chinese<sup>1</sup>** and **Korean**, account for 1.35% and .65% respectively, of Metro’s total stakeholders.

In support of the results above, Metro employees disclosed in Factor 2, that Spanish (92.27%) ranks highly as being one of the top three most spoken languages by LEP individuals, followed by Korean (34.09%), Mandarin (30%), and Cantonese (24.09%).

As a result, information categorized in Tier 1 of Vital Documents will consistently be made available to patrons in Spanish. Select information in the next two tiers will also be made available in Spanish as regularly as formats and resources permit. Notable exceptions are 1) non-essential promotional information, and 2) maps, whose language information consists almost exclusively of proper names, which are not ordinarily translated, including Spanish names such as San Pedro, Del Mar and Sierra Madre Villa, which are not translated into English.

As updated data on language groups and population becomes available, Metro will reassess this threshold as needed and make reasonable adjustments to accommodate within available resources.

After Spanish, Metro looked at the size of language groups described in Factor 3, as well as historical record of how much in-language offerings had been utilized by Metro customers, to determine the following LEP rider groups most likely to need and significantly benefit from having Tier 1, 2 and/or 3 information available in-language.

Languages to be included when providing translated information when doing so can be reasonably accommodated within currently available resources.

<b>LEP Group</b>	<b>Percentage of Metro’s Total Stakeholders</b>
<b>Spanish</b>	<b>16.61%</b>
<b>Chinese<sup>1</sup></b>	<b>2.13%</b>
<b>Korean</b>	<b>1.13%</b>
<b>Armenian</b>	<b>.87%</b>
<b>Vietnamese</b>	<b>.5%</b>
<b>Japanese</b>	<b>.25%</b>
<b>Russian</b>	<b>.27%</b>

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<sup>1</sup> Because Cantonese and Mandarin are the same in written form, they will be combined in assessments of language groups for the purpose of translating and printing materials.

## LEP Access Needs

### **Needs Related to Information Types/Channels**

In Factor 2, majority of LEP riders do not feel that their limited English skills make it difficult for them to use Metro. However, assessments in Factors 2 and 3 provided insight into how Metro can improve access to LEP persons. Below are the most salient findings as related to types of information and distribution channels:

- Route information/wayfinding, ticket machine instructions, timetables, and station announcements are the most common types of information LEP individuals are seeking.
- Demand for in-language information was requested among LEP patrons who speak Japanese, Cambodian, Spanish and Chinese.
- The most frequently suggested improvements to Metro services are posters/signage/brochures in more languages and more bi-lingual employees.
- The top change that would improve LEP rider's experience using Metro is signs, brochures, and announcements in their native language.
- The most important information to receive in a native language are signs at the bus stop, service changes, signs on the bus and brochures on bus.

### **Other Elements Needed for LEP Access**

Metro recognizes that providing reasonable LEP assistance goes beyond addressing translation needs raised in Factor 3. In addition to this feedback, Metro also identified other information that must be provided and processes to be undertaken to reasonably improve LEP access:

- Translation and posting of rights notice with Title VI information.
- Translation and availability of safety information related to using Metro's system.
- Availability of "I Speak" posters and language assistance cards with the contact number for Metro's telephonic language interpretation line.
- Information to help inform LEP patrons of availability of language assistance materials.
- Translation and availability of CEQA/NEPA outreach requirements for information pertaining to projects in development.
- Availability of general information in-language via telephone upon request.
- Availability of picture/numeral flash cards for LEP patrons upon request.
- Availability of translations in additional languages included in the Safe Harbor provision upon request. These languages are also available via live telephone interpreters on the main Metro Customer information line at all times.

## *Vital Documents*

Agencies receiving Federal funding are required to identify Vital Documents that must be translated. Vital Documents are defined as 1) any document critical for obtaining services and benefits, and/or 2) any document required by law.

In determining documents needed to provide meaningful access to Metro services for LEP customers, Metro has defined three levels of Vital Documents. This will allow for prioritization of materials translation according to availability of resources. In some cases, translation of Vital Documents may consist of only a summary or key points. For other Vital Documents, providing notice of available language assistance can also provide sufficient access.

### **Tier 1 – Safety, Security and Civil Rights**

Information categorized in Tier 1 is that which protects customers' physical safety and facilitates Metro customers to exercise their legal rights. Providing translation or LEP-accessible versions of this type of information is the highest priority of all Vital Documents. Information categorized as Tier 1 would be found within (but would not be all-inclusive of) the following information types identified in Factor 4: Safety and Security, and Rights Notices. Information about public hearings and comment opportunities related to Fare/TAP Information, Service Changes and Planning Information are also classified as Tier 1 Vital Documents. More specifically, this level of Vital Documents will also include information for vulnerable populations like elderly and disabled, as well as customer consent and complaint forms, and customer surveys related to any of the types of information included in Tier 1.

### **Tier 2 – Information Critical to Access Metro's Services**

Tier 2 includes information that helps LEP patrons to understand Metro service to facilitate ease of use. These types of information are critical for LEP-access because they provide more details about specific benefits available or details of Metro services. Information categorized as Tier 2 would be found within (but would not be all-inclusive of) the following information types identified in Factor 4: Basic Rider Information, Fare/TAP Information, Maps, Service Changes and Service Alerts. Again, surveys related to Tier 2 types of information will also be included in the same category.

### **Tier 3 – Information to Empower Customers**

This tier of information encompasses materials that help LEP customers to understand and participate with Metro at higher level. This includes information that can empower riders to play a larger role in contributing to long-term service decisions or use Metro for recreational activities. Information categorized as Tier 3 would be found within (but would not be all-inclusive of) the following information types identified in Factor 4: Project Updates, Planning Information and Destination Information. Customer surveys related to Tier 3 information will also be considered to be Tier 3 documents.

**Tables 10 and 11** summarize information types categorized in the three tiers of information described above.

**Table 10.** Types of Information by Vital Document Tier

<i>Tier</i>	<i>Information Type</i>
<p><b>Tier 1</b>  <b>Safety, Security and Civil Rights:</b> Information that protects customers' physical safety and informs Metro customers of their legal rights.</p>	<ul style="list-style-type: none"> <li>-Safety and Security information</li> <li>-Rights Notices</li> <li>-Information about Public Hearings and Comment Opportunities related to:                             <ul style="list-style-type: none"> <li>a. Fare/TAP Information</li> <li>b. Service Changes</li> <li>c. Planning Information</li> </ul> </li> </ul>
<p><b>Tier 2</b>  <b>Information Critical to Access:</b> Information that helps LEP patrons to understand Metro service to facilitate ease of use.</p>	<ul style="list-style-type: none"> <li>-Basic Rider Information</li> <li>-Fare/TAP Information</li> <li>-Maps</li> <li>-Service Changes</li> <li>-Service Alerts, Delays &amp; Detours</li> </ul>
<p><b>Tier 3</b>  <b>Information to Empower Customers:</b> Information and materials that help LEP customers to understand and participate with Metro at higher level.</p>	<ul style="list-style-type: none"> <li>-Project Updates</li> <li>-Planning Information</li> <li>-Destination Information</li> </ul>

**Table 11.** Types of Information by Vital Document Tier

<i>Types of Information and Vital Document Tier</i>	Basic Rider Info	Maps	TAP Info	Service Alerts	Service Changes	Safety	Project Updates	Destination Info	Planning Info	Rights Notices
	Tier 2	Tier 2	Tier 2	Tier 2	Tier 2	Tier 1	Tier 3	Tier 3	Tier 3	Tier 1

Note: Information categorized as Tier 1, 2 or 3 would be found within (but would not be all-inclusive of) the information types identified above.

## **Verbal LEP Assistance**

Metro is cognizant that providing quality and meaningful LEP assistance to our customers goes beyond providing only written translations of our programs, information and materials. However, unlike with written translations, Metro may not be able to assess the needs or severity of the needs of our LEP customers when they make a request for verbal assistance. Therefore, Metro has mechanisms in place to provide verbal assistance to all of our LEP customers. When Metro staff encounters LEP speaking customers, they will provide verbal assistance to LEP customers either by directly assisting the customer (if staff speaks the same language as the LEP customer) or connecting the customer to our third party language interpretation service.

## Language Assistance Measures

The following summarizes steps to be taken to reasonably provide LEP access based on findings outlined above. Metro will budget for critical items as needed in future year budgets.

- Translate nearly all printed materials, on-board information and station announcements, where practical, to Spanish, with exceptions for maps and non-essential promotional information.
- Use language-less pictures and symbols where possible to outline regulations for safe behavior in Metro facilities.
- Translate 'How to Ride' information for buses and rail into most prevalent seven languages, as resources allow.
- Create and maintain multilingual section of website in seven most prevalent languages that includes 'How to Ride' information and links to maps and timetables.
- Provide access to in-language telephone assistance for customers calling Metro.
- Use in-language advertising where possible to provide project updates and other service information to LEP communities.
- While difficulty reading maps was noted in LEP patron feedback, staff determined translation of maps is not a reasonable language assistance measure. Maps consist of imagery and proper names (streets, locales, Metro lines) and very little information would be translated (including proper names appearing in Spanish). In this case, costs for translation, printing and installation for map displays outweigh the benefit it would provide. Difficulty reading maps was reported more among newer LEP riders, as is also likely to occur among newer English speaking riders.
- Similar to maps, timetables include proper station names and times, and translation would not provide a reasonable opportunity to increase LEP access to information.
- Bilingual (Spanish and English) rail public announcements. Metro currently has bilingual courtesy announcements on selected rail lines;. One challenge Metro faces is that our rail cars operate with differing technology and therefore Metro is not able to deploy consistent bilingual PA announcements throughout our rail system.
- Bilingual employees in Rail Operations Control (ROC). In order to provide customer service for the large Spanish speaking LEP ridership it would be necessary to have bilingual staff (English and Spanish) in positions responsible for making station announcements concerning detours, service changes, delays or other safety/security information. Metro will explore opportunities to staff these positions with bilingual employees.

## *Language Assistance Materials*

Based on the language threshold, identification of Vital Documents and assistance measures above, Metro has determined the following information will be made available in the languages indicated. Table 12 summarizing selection of materials by language follows this description.

A) Spanish, Korean, Chinese, Japanese, Armenian, Russian, Vietnamese,

- Metro Notice of Civil Rights.
- Metro Civil Rights complaint forms.
- Other customer consent and complaint forms.
- Discounted fare applications for senior/disabled passengers.
- Brochure highlighting availability and means for obtaining in-language assistance.
- Printed “How to Ride” pocket guides outlining basics of using Metro Bus and Rail, fares and TAP passes.
- “How to Ride” sections of website with links to routes, maps and timetables.
- Availability of in-language telephone representatives upon request.

B) Spanish, Korean, Chinese and Japanese:

- Displays with “How to Ride” and fare information installed in select Metro Rail stations.

C) Spanish:

*All of the above, plus:*

- Tier 1 and Tier 2 printed information as space allows, with the exception of maps and select promotional information.

**Additional Languages:** Metro will determine reasonability of additional translations on a case-by-case basis for individual projects where specific in-language materials are needed. Additional languages will be determined based on frequency of requests for specific in-language materials and encounters with LEP patrons, language group population demographic data, and character of information and documents. For example, planning and construction projects in areas where significant in-language populations reside would provide their informational materials in those languages. Metro will offer in-language telephone representatives and make any information available upon request in any language, using contracted translation services to do so; any such requests will be tracked for the purpose of updating the plan as needed.

**Table 12.** Materials available in specific languages.

<b>Type of Information</b>	<b>Languages</b>	<b>Status</b>
Notice of Civil Rights	<ul style="list-style-type: none"> <li>☐ Spanish</li> <li>☐ Korean</li> <li>☐ Chinese</li> <li>☐ Japanese</li> <li>☐ Khmer</li> <li>☐ Thai</li> </ul>	Currently available.
Brochure with Information on Available Language Assistance	<ul style="list-style-type: none"> <li>☐ Spanish</li> <li>☐ Korean</li> <li>☐ Chinese</li> <li>☐ Japanese</li> <li>☐ Khmer</li> <li>☐ Thai</li> </ul>	Business Card format currently available in additional languages;
“How to Ride” pocket guides outlining basics of using Metro Bus and Rail, fares, and TAP passes	<ul style="list-style-type: none"> <li>☐ Spanish</li> <li>☐ Korean</li> <li>☐ Chinese</li> <li>☐ Japanese</li> <li>☐ Khmer</li> <li>☐ Thai</li> </ul>	Currently available in nine more languages;
“How to Ride” sections of the website with links to routes maps and timetables	<ul style="list-style-type: none"> <li>☐ Spanish</li> <li>☐ Korean</li> <li>☐ Chinese</li> <li>☐ Japanese</li> <li>☐ Khmer</li> <li>☐ Thai</li> </ul>	Currently available in nine manually translated languages; Additional languages available with Google Translate
Availability of in-language telephone representatives or information symbol flash cards upon request	<ul style="list-style-type: none"> <li>☐ Spanish</li> <li>☐ Korean</li> <li>☐ Chinese</li> <li>☐ Japanese</li> <li>☐ Khmer</li> <li>☐ Thai</li> </ul>	Currently available
As resources allow: Additional Tier 1 information particularly on the website	<ul style="list-style-type: none"> <li>☐ Spanish</li> <li>☐ Korean</li> <li>☐ Chinese</li> <li>☐ Japanese</li> <li>☐ Armenian</li> <li>☐ Russian</li> <li>☐ Vietnamese</li> </ul>	Ongoing

<b>Type of Information</b>	<b>Languages</b>	<b>Status</b>
Displays with “How to Ride” and fare information installed in select Metro Rail stations	<ul style="list-style-type: none"> <li>☐ Spanish</li> <li>☐ Korean</li> <li>☐ Chinese</li> <li>☐ Japanese</li> </ul>	Currently installed
Tier 1 and Tier 2 printed information as space allows, with the exception of maps and select promotional information.	<ul style="list-style-type: none"> <li>☐ Spanish</li> </ul>	Currently available

### *Notification of Resource Availability*

Metro will undertake the following activities to help notify in-language preferred passengers about available translated resources:

- Adding recordings to phone tree that customers hear upon dialing into main customer service information phone number
- Notice of translated resources in advertisements currently running in available in-language news publications
- Information about additional translated resources listed on in-language website landing pages

### *Monitoring and Evaluation*

Metro recognizes that an effective Language Assistance Plan must be able to adapt to evolving customer needs and demographics. To ensure this plan continues to provide assistance appropriate with the needs of Metro's LEP ridership, the following tactics will be used to monitor customer LEP needs and evaluate current assistance measures:

Metro will update the Language Assistance Plan as required by the U.S. DOT. At a minimum, the plan will be reviewed and updated every three years when the Title VI Program Update is due and supplemented when future U.S. Census data is available or when it is clear that higher concentrations of LEP individuals are present in Metro's service area.

**In-language Customer Surveys:** Approximately twice a year, Metro will conduct in-language surveys to collect feedback on all riders' experiences and preferences. In order to capture the experiences and preference of our LEP riders, these surveys will be administered in Spanish, Chinese, Korean, Japanese, Armenian, Russian and Vietnamese. The surveys may be conducted on-board Metro vehicles, online and through partner community groups serving in-language populations. If possible, the surveys will also be conducted over the telephone.

**Customer Relations Data:** Metro's Customer Relations department fields requests and complaints relating to all aspects of Metro's service. To help monitor and evaluate Metro's language assistance activities, this department will record the number of calls received requesting assistance in-language.

In order to ensure that Metro is in compliance with the Limited English Policy under Title VI of the Civil Rights Act of 1964, Metro is initiating a Mystery Rider Program which requires 100 quarterly system observations and contacts of Metro employees through its system. The observations and contacts will help Metro monitor and test the compliance of Metro employees who have contact with the public with the Language Assistance Program of Metro as mandated by Title VI and Executive Order 13166. This will include evaluating Metro's bus services, contracted bus services and other frontline employees having direct contact with LEP customers.

### Priority of Assistance Provision

Finally, LEP informational materials are prioritized in relation to available resources to provide materials and programs to meet them. This included looking at reasonably delivering information to LEP persons based on available and projected resources and distribution channels.

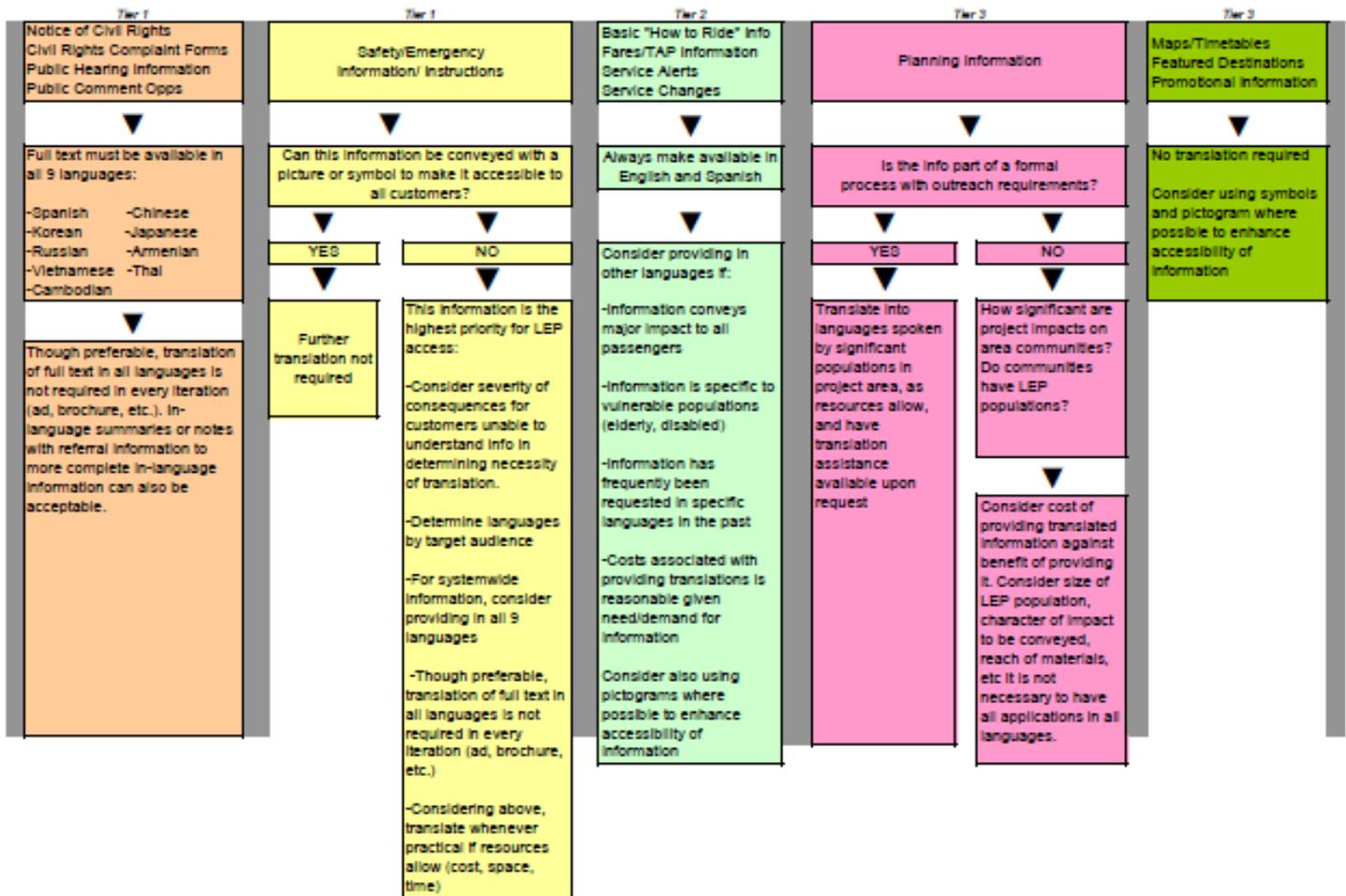
The table below outlines specific materials already in use. Updates and changes to the following list of language assistance measures will be based on available resources.

**Table 13.** Language Assistance Service

<b><i>Language Assistance Service</i></b>	<b><i>Implementation Timeline</i></b>
Provide printed materials and signage in bilingual English/Spanish format	In effect
Metro Notice of Civil Rights posted in stations and distributed on vehicles	In effect
Metro Notice of Civil Rights displayed at Metro-hosted public meetings	In effect
Printed and on-system information pertaining to “How to Ride,” Fare/TAP, Service Alerts, Service Changes, Safety and Project Updates available bilingual English/Spanish	In effect
Instructional picture symbols indicating safe behavior in stations and on buses according to Metro Code of Conduct	In effect
Telephone assistance available by request in a variety of languages	In effect
Language Assistance LEP Card in all seven languages	In effect
Spanish, Chinese, Korean and Japanese in-language instructional station displays in targeted areas	In effect
“How to Ride” pocket guides in four languages	In effect
Multilingual section of website with information on assistance available in four different languages	In effect
Symbol flash cards for providing to LEP customers upon request	In effect
Metro “I Speak” Poster for identifying languages spoken by LEP customers	In effect
Monitoring program to review informational needs of LEP riders and shifting demand	Ongoing
Sensitivity training for new employees and those regularly interfacing with LEP customers	In effect

## Metro's Language Assistance Plan - Reference Guidelines

To determine translation requirements, first ask: "In which category does this item belong?"



### Employee Training

In order to ensure that Metro is providing timely and reasonable language assistance to our LEP customers we will provide training and access to language assistance resources to staff.

Training will include:

- Sensitivity training for new employees and those regularly interfacing with LEP customers
- Training for all employees on how to access Metro's third party telephonic language interpretation service
- Distribution of Metro's LEP Business Card and I Speak Language Assistance Poster to all staff that regularly interface with LEP customers

## **7. Minority Representation on Planning and Advisory Bodies**

Pursuant 49 CFR Section 21.5 (b)(1)(vii) and the requirements set forth in FTA C 4702.1B, Metro maintains a list depicting the racial breakdown of the membership of its transit-related non-elected planning boards, advisory councils and committees. The boards, councils, and committees are as follows:

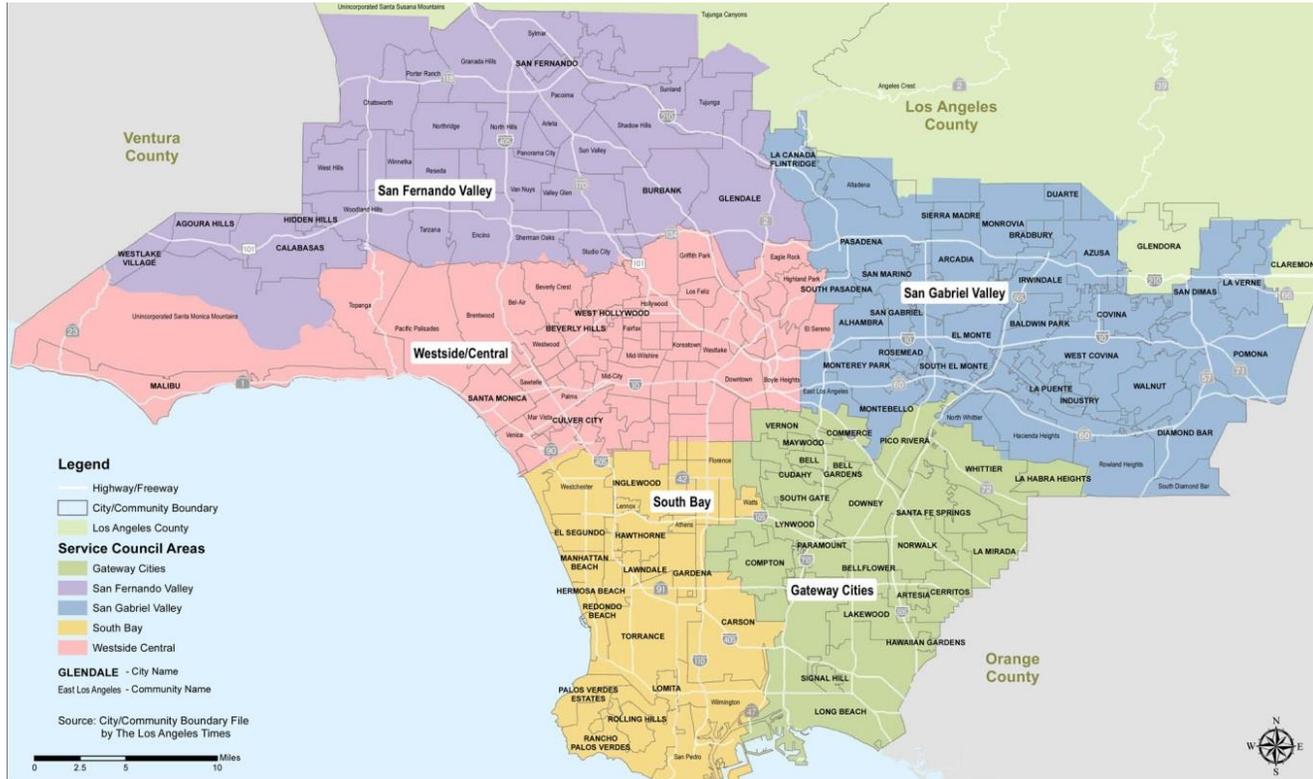
- i. Service Councils
  - a. Gateway Cities
  - b. San Fernando Valley
  - c. San Gabriel Valley
  - d. South Bay
  - e. Westside/Central
- ii. Transportation Business Advisory Council (TBAC)
- iii. Citizen's Advisory Council (CAC)
- iv. Accessibility Advisory Committee (AAC)
- v. Metro Policy Advisory Council (PAC)

### **Description of Efforts Made to Encourage Minority Participation**

#### **i. Service Councils**

Metro's Service Councils advise on Metro services in five geographic regions; Gateway Cities (Southeast LA County), San Fernando Valley, San Gabriel Valley, South Bay Cities and Westside/Central.

The following [map](#) illustrates the five service council areas:



### Metro Service Council Appointments Overview

The purpose of Metro Service Councils is to improve bus service and promote service coordination with municipal and local transit providers. The Service Council's primary responsibilities are to receive presentations on proposed Metro bus service changes from Metro staff, community input on proposed service modifications, conduct public hearings for major service changes, and to render decisions on proposed bus route changes considering staff recommendations and public comments. Metro has five Service Councils, each representing a distinct region of Metro's service area. Those regions are: Gateway Cities, San Fernando Valley, San Gabriel Valley, South Bay, and Westside/Central.

The Service Councils are composed of transit users, local leaders, and/or elected officials that live, work or represent the region from which they are appointed; at least fifty percent of each Council members shall be regular users of public transit services. Each Service Council is comprised of nine Members that serve a term of three years; terms are staggered so that the terms of three of each Council's nine members expire annually on June 30. Incumbent Members can serve additional terms if re-nominated by the nominating authority and confirmed by the Metro Board; there are no term limits.

Potential Service Council Members are nominated for appointment by the respective Service Council nominating authorities. Nominations are gathered by Metro Service Council staff and submitted to the Board of Directors for approval. A few months prior

to the expiration of a Representative’s term, Metro Service Council staff notifies the nominating authorities and asks them to submit a nomination for their incumbent representatives to serve another term or to submit the name and resume of a new nominee. Generally, due to the specific nature of knowledge and the institutional history that is preserved by maintaining some incumbents on each of the Councils, the nominating authority approaches incumbent representatives to verify whether they would like to continue to serve on their respective council; usually the incumbents choose to remain on the Council.

Service Council Members occasionally resign at the end of their terms or prior, for various personal or professional reasons. In those instances, the nominating authorities are contacted to submit the nomination of a replacement candidate to serve the remainder of the term. The replacement nomination is then submitted by Service Council staff to the Metro Board for approval as soon as the process can be completed.

Regional Service Councils	Race/Ethnicity of Committee Members - For Title VI Purposes					
	White	Hispanic/Latino	African-American	Asian-Pacific Islander	Alaskan/Native-American	Two-or-More Races
Gateway Cities	4	5	0	0	0	0
San Fernando Valley	4	5	0	0	0	0
San Gabriel Valley	4	3	0	1	1	0
South Bay	3	3	2	1	0	0
Westside Central	3	3	2	1	0	0

Each Service Council has its own schedule of nominating authorities. Those authorities are as follows:

**Gateway Cities Service Council Nominating Authorities**

All Gateway Cities Services Council Members are nominated by the Gateway Cities Council of Governments (COG). The Gateway Cities COG represents 27 cities in the Harbor Gateway region as well as portions of unincorporated Los Angeles County. The Gateway Cities COG has determined that its appointments to the Council shall include a majority of public transit users and not exceed four (4) elected officials. In order to solicit applications for nominees to fill vacant Council seats of elected officials, the COG solicits applications by direct notification sent to all mayors and city council members in the Gateway Cities region. In order to solicit applications for nominees to fill vacant

Council seats for non-elected officials, the COG places advertisements in regional publications that serve the Gateway Cities region.

### **San Fernando Service Council Nominating Authorities**

Four of the nine seats on the San Fernando Service Council are nominated by the Office of the Mayor of Los Angeles. To fill any vacancies, the Mayor's Office generally solicits potential appointee names and resumes from its network of transit advocates. Then any potential appointees are reviewed in relation to the make-up of the current council. Appointees representative of the diversity (both geographic and ethnic) that may be lacking on the Council are interviewed and the Office of the Mayor then makes its selection.

Two seats are allocated to an East Valley cluster of cities, which includes Burbank, Glendale, and San Fernando. When either of those seats is vacant or terms are expiring, Metro Service Council staff notifies the mayors and city managers of each city within the cluster to request that they submit nominations to fill the expiring Council Member terms or vacancies. If more than one nomination per city cluster is received, Metro Service Council staff then asks all of the cluster cities to decide amongst themselves which of the nominees they wish to have appointed. Generally, the city clusters nominate a city employee who works in a transit-related position or a city council member who is involved in local transit issues.

One seat each is allocated to the Offices of the Los Angeles County 3rd District Supervisor and the 5<sup>th</sup> District Supervisor. In order to fill their Service Council vacancies, both the Office of the 3rd District Supervisor office solicit potential appointee names and resumes from their networks of transit advocates. Potential appointees are reviewed on a number of factors including current composition of the council, experience in transit advocacy and knowledge of the transit issues impacting their geographic area. The goal in making the final selection(s) is to have a council representative of the ethnic and cultural diversity of the district.

One seat is allocated to the Las Virgenes-Malibu Council of Governments (COG). As there is limited Metro bus service to the Las Virgenes-Malibu COG's region, the COG generally looks to people that have some familiarity with the needs of those cities.

### **San Gabriel Valley Service Council Nominating Authorities**

Three of the seats on the San Gabriel Valley Service Council are nominated by the San Gabriel Valley Council of Governments (SGVCOG). When the SGVCOG has vacancies, the COG sends notifications through its Governing Board, which is made up of area elected officials, and its Transportation Committee which is composed of city delegates, their alternates, and/or city-appointed staff. The SGVCOG has an informal practice of having at least one of its seats occupied by an elected official at all times. The SGVCOG also strives to have at least one transit user or individual with extensive knowledge of the

transit system occupy at least one of its seats at all times. Any vacancies of a transit user seat are filled by soliciting nominations from the SGVCOG's Governing Board and its Transportation Committee. Applications for any vacancies are then reviewed by the Transportation Committee, and selection is made based on applicant knowledge of the region's transportation issues and existing regional representation on the Council.

One seat each is allocated to the Offices of the Los Angeles County 1<sup>st</sup> District Supervisor and the 5<sup>th</sup> District Supervisor. In order to fill their Service Council vacancies, the Offices of the 1<sup>st</sup> and 5<sup>th</sup> District Supervisors solicit potential appointee names and resumes from their networks of transit advocates. Potential appointees are reviewed on a number of factors including current composition of the council, experience in transit advocacy and knowledge of the transit issues impacting their geographic area(s). The goal in making the final selection is to have council representative(s) of the ethnic and cultural diversity of the district.

The remaining four seats are nominated by clusters of cities. The city clusters are:

- Alhambra, San Gabriel, South Pasadena, and San Marino
- Arcadia, El Monte, and Temple City
- Montebello, Monterey park, and Rosemead
- Pasadena, Sierra Madre, and La Cañada Flintridge

For those seats nominated by clusters of cities, Metro Service Council staff notifies the mayors and city managers of each city within the cluster, requesting that they submit nominations to fill any expiring Service Council Member terms or vacancies. If more than one nomination per city cluster is submitted, then the cluster cities are asked to decide amongst themselves which of the nominees they wish to have appointed. Generally, the city clusters nominate a city employee who works in a transit-related position or a city council member who is involved in area transit issues.

### **South Bay Service Council Nominating Authorities**

All South Bay Service Council Members are nominated by the South Bay Cities Council of Governments (SBCCOG). The SBCCOG is a joint powers authority of 16 cities and the County of Los Angeles. The SBCCOG Board of Directors has previously stated a strong preference that transit users or those familiar with the South Bay transit services be selected to serve as council members and in no case shall elected officials represent a majority of the Service Council. The SBCCOG also works to ensure that one position be filled by a representative from one of the South Bay's municipal transit providers.

To recruit nominees to serve on the South Bay Service Council, the SBCCOG circulates a Call for Nominations among their regions' elected officials, city managers, city clerks and working groups of the South Bay Cities COG. The SBCCOG's Steering Committee then reviews nominations and forwards their recommendations to the SBCCOG Board, which approves the nominations and forward to Metro for approval by the Metro Board.

**Westside/Central Service Council Nominating Authorities**

Four of seats on the Westside/Central Service Council are nominated by the Office of the Mayor of Los Angeles. To fill any vacancies, the Mayor’s Office generally solicits potential appointee names and resumes from its network of transit advocates. Then any potential appointees are reviewed in relation to the make-up of the current council. Appointees representative of the diversity (both geographic and ethnic) that may be lacking on the Council are then interviewed and the Office of the Mayor makes its selection.

One seat each is allocated to the Office of the Los Angeles County 2nd District Supervisor and the 3<sup>rd</sup> District Supervisor. To fill any Service Council seat vacancies, the Offices of the 2<sup>nd</sup> and 3<sup>rd</sup> District Supervisors solicit potential nominee names and resumes from their networks of transit advocates. Potential appointees are reviewed on a number of factors including current composition of the council, experience in transit advocacy and knowledge of the transit issues impacting their geographic area(s). The goal in making the final selection(s) is to have a council representative of the ethnic and cultural diversity of the district(s). Once a nominee has been selected, the name is forwarded to Metro Service Council Staff to facilitate the Board approval process.

ii. **Transportation Business Advisory Council (TBAC)**

	<b>Race/Ethnicity of Committee Members - For Title VI Purposes</b>					
	White	Hispanic/Latino	African-American	Asian-Pacific Islander	Alaskan/Native-American	Two-or-More Races
Transportation Business Advisory Committee (TBAC)	2	4	1	3	1	9

Small Business owners and interested parties are welcomed and encouraged to attend the monthly Transportation Business Advisory Council (TBAC) meeting. TBAC meetings provide small businesses a forum to discuss topics and issues impacting business owners throughout the contracting community. Particularly, TBAC advocates for small business owners to have increased access to Metro’s procurement process.

TBAC meetings are beneficial for all business interests. The meetings feature a monthly speaker series, Metro current and future contract opportunities, legislation updates, and current trends in transportation.

TBAC is comprised of professional business associations representing an array of industries and trades. TBAC has been instrumental in working with the Diversity & Economic Opportunity Department (DEOD) to develop a successful path forward bridging relationships between small businesses and Metro.

Efforts are made to encourage representatives from minority, female and small business organizations to participate in TBAC at both internal and external business outreach events. Internal outreach events include, but are not limited to, monthly “How to do Business with Metro” workshops, “Meet the Prime” contractor events, “Meet the Buyers” events, “Meet and Greet” small and large businesses events for large projects, and other events at Metro. External events include, but are not limited to, “Orange County Transportation Authority (OCTA) Small Business Conference, Southern California Minority Business Development Council (SCMBDC) Business Enterprise Fair, Minority Enterprise Development (MED) Week – Mayor’s Office,” and a host of small and minority business organization events.

A typical list includes the following:

- Asian American Architects/Engineers Annual Awards Dinner
- National Association of Minority Contractors Awards Dinner
- Latin Business Association Sol Business Awards Gala
- Black Business Association Procurement Summit / Expo
- Asian Business Association Annual Awards Banquet
- Women’s Transportation Seminar Expo
- Greater Los Angeles African American Chamber of Commerce Economic Awards Dinner
- National Association of Women’s Business Owners – Los Angeles Awards Luncheon
- Regional Hispanic Chamber of Commerce Conference
- American Indian Chamber of Commerce Luncheon
- Women’s Transportation Coalition Expo

TBAC Member organizations are appointed by the Metro Board of Directors.

**iii. Citizens Advisory Council**

	<b>Race/Ethnicity of Committee Members - For Title VI Purposes</b>					
	White	Hispanic/Latino	African-American	Asian-Pacific Islander	Alaskan/Native-American	Two-or-More Races
Community Advisory Council (CAC)	9	6	4	2	0	0

On May 19, 1992, the governor signed AB 152 (Katz) into law. This act merged the Los Angeles County Transportation Commission and the Southern California Rapid Transit District and created Metro. As part of AB 152, Metro was to establish a Citizens' Advisory Council whose "membership shall reflect a broad spectrum of interest and all geographic areas of the County."

The CAC consults, obtains and collects public input on matters of interest and concern to the community and communicates the CAC's recommendations with respect to such issues to Metro. Issues may also be assigned to the CAC by Metro for its review, comment and recommendation. The CAC meets twice monthly, once at the beginning of the month for their Executive Committee Meeting, and once towards the end of the month for the General Assembly Committee Meeting. Every Board member may appoint up to four members to the CAC. The CAC consults, obtains and collects public input on those matters of interest and concern to the community and communicates key feedback and CAC recommendations with respect to such issues to the Metro Board and staff.

Each member of the Metro Board of Directors nominates four public members to the CAC to serve at the pleasure of the appointing Board member.

To fill seat vacancies, the Offices of District Supervisors solicit potential nominee names and resumes from their networks of transit advocates. Potential appointees are reviewed on a number of factors including current composition of the council, experience in transit advocacy and knowledge of the transit issues impacting their geographic area(s). The goal in making the final selection(s) is to have a council representative of the ethnic and cultural diversity of the district(s). Once a nominee has been selected, the name is forwarded to chair of the CAC to facilitate the Board approval process. In order to promote diversity and public access to information, the CAC web page has been updated to accommodate multiple language translations, and any member of the public wishing to have meeting materials in a different language are at the meeting are able to notify Metro staff with such translation requests or other needed special accommodations. Additionally, CAC Meeting Agendas and materials are regularly translated into Braille, typically per monthly requests made by a CAC Member who is blind.

**iv. Accessibility Advisory Council**

	<b>Race/Ethnicity of Committee Members - For Title VI Purposes</b>					
	White	Hispanic/Latino	African-American	Asian-Pacific Islander	Alaskan/Native-American	Two-or-More Races
Accessibility Advisory Council (AAC)	8	6		3		

Metro strives to ensure that its services are fully accessible to all of our customers, including those with disabilities. The AAC provides advice to Metro on policy and allocation issues affecting transportation of older adults and persons with disabilities. The AAC recruits members based on several criteria; the most important being strong familiarity with, and close connection to, communities with disabilities. Individuals are also required to demonstrate some knowledge of transit. Selections to the committee are made keeping in mind the demographics, both geographic and racial/ethnic, of the county. This is accomplished through extensive outreach to elected officials and organizations within the community. In addition, Metro promotes diversity on the Council by providing language interpretation services for Limited English Proficient members on the council.

**v. Metro Policy Advisory Council (PAC)**

	Race/Ethnicity of Committee Members - For Title VI Purposes					
	White	Hispanic/Latino	African-American	Asian-Pacific Islander	Alaskan/Native-American	Two-or-More Races
Policy Advisory Council (PAC)	9	4	2	3	0	1

The PAC has been established to review, comment and provide input on the draft Measure M Master Guidelines (Guidelines), the Long Range Transportation Plan (LRTP), and possibly other work plans and policy areas that the Metro Board may request. The PAC will report directly to the Board, and its Committees as appropriate, on the issues being addressed at the PAC meetings. In order to ensure an equal, representative voice of all constituencies, the PAC is made up of three major constituency categories, each with 10 representatives reflective of a diverse coalition of stakeholders. The categories include: transportation consumers – those who use or are impacted by our complex transport system; transportation providers – those who supply or regulate transportation infrastructure and services; and jurisdictions – representatives of elected bodies accountable to the needs of consumer and provider constituencies. Members are selected by each of the constituency categories.

## **8. Assisting and Monitoring Subrecipients**

In accordance to FTA Circular 4702.1B, Metro is committed to ensuring that we distribute FTA funding without regard to race, color, or national origin and that our subrecipients are also in compliance with FTA Title VI regulations. Metro requires subrecipients to verify their compliance with FTA Title VI regulations by adhering to the requirements set forth in Circular 4702.1B and submitting a Title VI program to Metro on a triennial basis.

Since January 2013, Metro has had procedures in place to train and monitor all subrecipients with regard to FTA Title VI compliance. The dates for Title VI submission are assigned on a rolling basis as Metro currently oversees approximately 67 subrecipients.

Metro has continued with our Title VI Subrecipient Compliance Training program. Our training program consists of in-person, multimedia training to inform subrecipients of the FTA Title VI regulations and assist them with creating a Title VI Program for their organization.

Metro has and will continue to provide subrecipients with assistance in the form supplemental materials including:

- i. Sample documents: Title VI Program Updates, Notices to the Public, Complaint forms, Public Participation Plans, and Language Assistance Plans;
- ii. Demographic (Census) information; and
- iii. Tracking matrices to assist subrecipients with organizing their program updates and to allow Metro to document suggestions/corrections to a program update.

Metro's Civil Rights Senior Manager Title VI will conduct a full review of the subrecipient's Title VI Program Update. After a thorough review of the subrecipient's program update, Metro will determine if the update is compliant or noncompliant with Department of Transportation's (DOT) Title VI regulations. If the Program Update is compliant, Metro will send written notification informing the subrecipient of their compliance and the next triennial due date for their Title VI Program Update. If the subrecipient's Program Update is not fully compliant, Metro will inform subrecipients in writing of the deficient areas and offer assistance to cure the deficiencies. Metro's goal is to work closely with subrecipients to cure deficiencies within 30 days. All final subrecipient Title VI Program Updates will be stored electronically.

Metro will audit and monitor each subrecipient's Title VI Program. Metro's monitoring program will include documentation of any suggested changes made to the subrecipient's Title VI Program Update. Metro will also monitor subrecipients' websites to ensure ongoing compliance.

Periodic site visits will also be conducted as time and resources allow. During the site visits Metro will inspect the subrecipient vehicles and facilities for compliance with Title VI requirements such as: the posting of Notice to the Public, evidence of outreach to the limited English populations identified in the subrecipient's LEP Plan, and the location and distribution of complaint procedures. The schedule of Title VI Program Update submissions is in this section.

Agency	Descriptions	Status	Due Date	Submitted	Status
Able ARTS Work/ Formerly Arts & Services for Disabled Access Services Inc.	Capital and Operating Assistance		12/31/2019		Concurred
AltaMed Health Services Corporation	Operating and Capital Assistance	Direct Recipient			
Antelope Valley Transit Authority (AVTA)	Vehicle Procurements		5/1/2020		Concurred
City of Artesia	Operating and Capital Assistance	Direct Recipient			
City of Avalon	Vehicle Procurements		8/30/2019	8/30/2019	In Review
City of Azusa	Capital Assistance		5/23/2020		Concurred
City of Baldwin Park	Parking Structure		9/2/2020		Concurred
City of Bell Gardens	Passenger & Pedestrian Enhancements , Vehicles		8/30/2019	8/30/2019	In Review
City of Bellflower	Vehicle Procurements		11/30/2021		Concurred
Bob Hope Airport Authority	Buses and Passenger & Pedestrian Enhancements		7/22/2019	7/24/2019	In Review
City of Burbank	Transit Center		11/30/2019		Pending
City of Calabasas	Bus Procurement		8/30/2019		In Review
California State University Northridge	Capital Assistance		9/30/2019		In Review
Cedars-Sinai Medical Center	Capital Assistance		3/14/2020		Concurred
City of Cerritos	Passenger and Pedestrian Enhancement		3/16/2020		Concurred
City of Compton	Bus Procurement		8/30/2019	8/30/2019	In Review
Disabled Resource Center, Inc., (DRC)	Bus Procurement		9/30/2019		Extended
City of Downey	Operating Assistance		3/13/2020		Concurred
East Los Angeles Remarkable Citizens Association ( EL ARCA)	Vehicle and Equipment Procurements		5/10/2019	6/12/2019	In Review
City of El Monte	Vehicle Procurements		5/23/2020		Concurred
City El Segundo	Bus Procurement		12/31/2019		Concurred
FAME	Transit Center				
Fiesta Taxi Cooperative,Inc.,	Operating Assistance		3/14/2020		Concurred
City of Glendale	Vehicle Procurements				
Good Samaritan Hospital	Bus Procurement and CNG Facility		7/17/2021		Concurred
City of Hawaiian Gardens	Operating and Capital Assistance		1/22/2022	3/5/2019	Concurred
	Bus Shelters		3/16/2020		Concurred

City of Inglewood	Operating and Capital Assistance		3/17/2020		Concurred
Institute for the Redesign of Learning (IRL)	Bus Procurement	Cal Trans Recipient	6/1/2020		
Jovenes	Operating Assistance	Deobligated- Letter Received 5/30/18			
City of La Habra Heights	Vehicle Procurements	Concurrence ltr 2/7/19	2/1/2021		Concurred
City of Lakewood	Bus Shelters	See Notes	EXEMPT	EXEMPT	N/A
LA County Dept., Workforce Developing, Aging and Community Services (WDACS)	Operating and Capital Assistance		5/23/2020		Concurred
City Los Angeles (City of, includes LADOT)	Passenger and Pedestrian Enhancements/Integrated Mobility Hubs	Direct Recipient			
Los Angeles Community College District (LACCD)	Passenger and Pedestrian Enhancements		3/4/2020		Concurred
Los Angeles County Department of Public Works	Vehicle Procurements	Direct Recipient			
Los Angeles Jewish Home for the Aging	Vehicle Procurements		8/30/2019	8/30/2019	In Review
City of Long Beach, Dept. of Public Works	Bus Shelters and Equipment		9/30/2019	9/27/2019	In Review
Long Beach Transit	Capital and Operating Assistance	Direct Recipient			N/A
City of Monrovia	Transit Center		12/16/2019		Concurred
City of Monterey Park	Buses and Passenger & Pedestrian Enhancements		10/25/2019	9/18/2019	In Review
New Horizons (SFV-Org)	Capital Assistance		8/30/2019	7/12/2019	Concurred
City of Palmdale	Transit Center		3/17/2020		Concurred
Palos Verdes Peninsula Transit Authority	Bus Procurement		8/30/2019		In Review
City of Paramount*	Bus Procurement		10/28/2019		Concurred
City of Pasadena	Bus Procurements, ITS Project		8/30/2019	8/28/2019	In Review
Playa Capital Company, LLC	Bus Procurement		10/25/2019		Concurred
Pomona Valley Community Senior Services (CSS)	Operating Assistance		5/23/2019	5/8/2019	In Review
Pomona Valley Transportation Authority( PVTA)	Capital and Operating Assistance		6/15/2020		Concurred
Rancho Research Institute ( RRI) (formly Los Amigos)	Capital and Operating Assistance		5/23/2020		Concurred
Rosemary Children's Services	Vehicle Procurements		10/28/2019		Concurred
City of San Fernando	Bus Procurement	Notice Sent	7/22/2019		<b>Expired</b>
Santa Clarita Valley Committee of Aging (Senior Center)	Vehicle Procurements	Notice Sent	11/30/2018		<b>Expired</b>

City of Santa Monica	Operating Assistance		11/30/2019		Concurred
City of Sierra Madre	Buses and CNG Facility		10/28/2019		Concurred
City of South El Monte	Bus Procurement		8/30/2019	8/30/2019	In Review
City of South Gate	Bus Procurement		7/22/2019		<b>Expired</b>
Tarzana Treatment Center	Vehicle Procurements		6/1/2020		Concurred
The Information and Referral Federation of Los Angeles County (211LA)	Capital Assistance		12/16/2019		Concurred
Therapeutic Living Centers for the Blind	Operating and Capital Assistance		5/23/2020		Concurred
Valley Village	Vehicle Procurements		12/18/2019		Concurred
Villa Esperanza Services	Vehicle Procurements		11/30/2018	12/5/2018	In Review
City of West Covina	Bus Procurement	No longer subrecipient			
City of West Hollywood	Operating and Capital Assistance		12/13/2019		Concurred
Westside Pacific Villages	Vehicle Procurement and Operating Assistance		8/30/2019	8/30/2019	In Review
White Memorial Medical Center	Operating Assistance		9/30/2021		Concurred
City of Whittier	bus shelters and operating assistance		12/31/2019		Concurred

## **9. Determination of Site or Location of Facilities**

To ensure compliance with 49 CFR Section 21.9, Metro is required to conduct a Title VI equity analysis for new locations or facilities in order to ensure that locations are selected without regard to race, color, or national origin. Since the last program submission, Metro has approved construction of a transit facility. The Title VI Facility Analysis is included in this section.

# East San Fernando Valley Transit Corridor

## TITLE VI EQUITY ANALYSIS

May 2019



**I N A S S O C I A T I O N W I T H :**

**GPA Consulting**

**ICF International**

**Stanley R. Hoffman Associates, Inc.**

GPA Consulting. 2019. Title VI Equity Analysis. East San Fernando Valley Transit Corridor. Prepared for the Los Angeles County Metropolitan Transportation Authority, Los Angeles, CA.

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Title VI Equity Analysis for the Siting or Location of Facility

## 1. INTRODUCTION

Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) protects people from discrimination based on race, color, and national origin in programs and activities receiving federal financial assistance. In 1970, the U.S. Department of Transportation (DOT) established Title VI regulations in 49 CFR Part 21, entitled Non-Discrimination in Federally-Assisted Programs of the Department of Transportation.

As a DOT operating administration, the Federal Transit Administration (FTA) provides financial assistance to develop new transit systems and improve, maintain, and operate existing systems, and is responsible for ensuring that recipients follow Federal statutory and administrative requirements. In 2012, FTA issued Circular 4702.1B, which provides recipients of FTA financial assistance with guidance and instructions necessary to carry out DOT's Title VI regulations. In addition, the Los Angeles County Metropolitan Transportation Authority's (Metro) Administrative Code includes Title VI requirements in Chapter 2-50.

FTA and Metro are proposing the East San Fernando Valley Transit Corridor Project (project), with FTA as the Lead Agency under the National Environmental Policy Act (NEPA) and Metro as the Lead Agency under the California Environmental Quality Act (CEQA). The Draft Environmental Impact Statement (EIS)/Environmental Impact Report (EIR) prepared for the project considered four build alternatives: a curb-running bus rapid transit (BRT) (Build Alternative 1), a median-running BRT (Build Alternative 2), a median-running tram (Build Alternative 3), and a median-running light rail transit (LRT) (Build Alternative 4) (FTA and Metro, 2017).

As shown in Figure 1, all of the build alternatives would operate over 9.2 miles from the Sylmar/San Fernando Metrolink station to the north to the Metro Orange Line station to the south. All build alternatives would serve the City of San Fernando and the City of Los Angeles communities of Sylmar, Pacoima, Arleta, Panorama City, and Van Nuys.

Build Alternatives 3 and 4 would require a Maintenance and Storage Facility (MSF) to accommodate both operational and administrative functions. The MSF site would require approximately 25 to 30 acres, and must be located  $\frac{1}{4}$  mile or less from, the proposed alignment in an industrialized area where the MSF's inherent noise and vibration would have less of an impact on neighboring businesses.

Three options for the MSF site were considered and would be located at or near the following intersections, as shown in Figure 1:

- MSF Option A – Van Nuys Boulevard/Metro Orange Line,
- MSF Option B – Van Nuys Boulevard/Keswick Street, and
- MSF Option C – Van Nuys Boulevard/Arminta Street.

Figure 1. Project Alignment and MSF Location Options



Source: LA County 2018, LA Metro 2018.

All of the MSF location options would require the displacement of existing business properties, and MSF Option A would also require the displacement of four housing units. The Metro Board approved a modified at-grade Build Alternative 4 (median-running LRT) with MSF Option B as the locally preferred alternative on June 28, 2018 (Metro, 2018). Therefore, this analysis is a retroactive analysis to ensure that the siting or location of the MSF is selected without regard to race, color, or national origin, in compliance with Title VI of the Civil Rights Act of 1964, FTA's Circular 4702.1B, and Metro's Administrative Code, Chapter 2-50-015.

The Draft EIR/EIS prepared for the project incorporated an Environmental Justice Impacts Report that included a study of the racial and poverty characteristics of the population that would be affected by the proposed MSF (FTA and Metro, 2017). Because displacements would primarily affect existing businesses, this Title VI Equity Analysis incorporates a site-specific percentage analysis (Stanley R. Hoffman Associates, Inc., 2019) to determine the potential for disparate impacts on minority employees and business owners on the basis of race, color, or national origin.

## 2. REGULATORY SETTING

### 2.1 FTA's Circular 4702.1B, Chapter III, General Requirements

Chapter III of FTA's Circular 4702.1B describes requirements that all FTA recipients must follow to ensure that their programs, policies, and activities comply with DOT's Title VI regulations. The following requirements are listed under "Determination of Site or Location of Facilities:"

- Title 49 CFR Section 21.9(b)(3) states, "In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part." Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, "The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin." For purposes of this requirement, "facilities" does not include bus shelters, as these are transit amenities and are covered in Chapter IV, nor does it include transit stations, power substations, etc., as those are evaluated during project development and the NEPA process. Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. In order to comply with the regulations:
  - The recipient shall complete a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. Recipients shall engage in outreach to persons potentially impacted by the siting of facilities. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.

- When evaluating locations of facilities, recipients should give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group where appropriate to ensure that proper perspective is given to localized impacts.
- If the recipient determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, the recipient may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. The recipient must show how both tests are met; it is important to understand that in order to make this showing, the recipient must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

## **2.2 Metro's Administrative Code, Chapter 2-50-015**

Metro's Administrative Code includes Title VI requirements in Chapter 2-50-015, Determination of Site or Location of Facilities, which state:

- This provision applies to, but is not limited to, storage facilities, maintenance facilities, operations centers, etc. This provision does not apply to bus shelters, transit stations, fixed guideways or ancillary facilities such as power substations.
- Metro shall complete a Title VI Equity Analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. The analysis, which must compare the equity of impacts of various siting alternatives, must occur before the selection of the preferred alternative.

## **3. DEFINITIONS**

The following terms are used in this document:

**Minority Population:** Because displacements would primarily affect existing businesses, the minority groups that are the focus of this analysis are minority employees and business owners. Minority status is defined by race/ethnicity categories of individuals self-identifying as Hispanic and non-Hispanic African-American, Asian and Pacific Islanders, Two or More Races, or Other Non-White race categories.

**Disparate Impact:** A disparate impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effects on the basis of race, color, or national origin. A disparate impact will be deemed to have occurred if the absolute difference between the percentage of the minority population adversely affected by the MSF and the overall percentage of the minority population in Los Angeles County is at least 5%, or if there is

a 20% or greater difference between the percentages of these two groups. This definition is based on Metro's Administrative Code, Chapter 2-50-20.

#### 4. AFFECTED AREA AND ADVERSE EFFECTS

As stated previously, a modified at-grade Build Alternative 4 (median-running LRT), the locally preferred alternative, would require a MSF to accommodate both operational and administrative functions. Three options for the MSF site were considered in the Draft EIS/EIR: MSF Option A, MSF Option B, and MSF Option C.

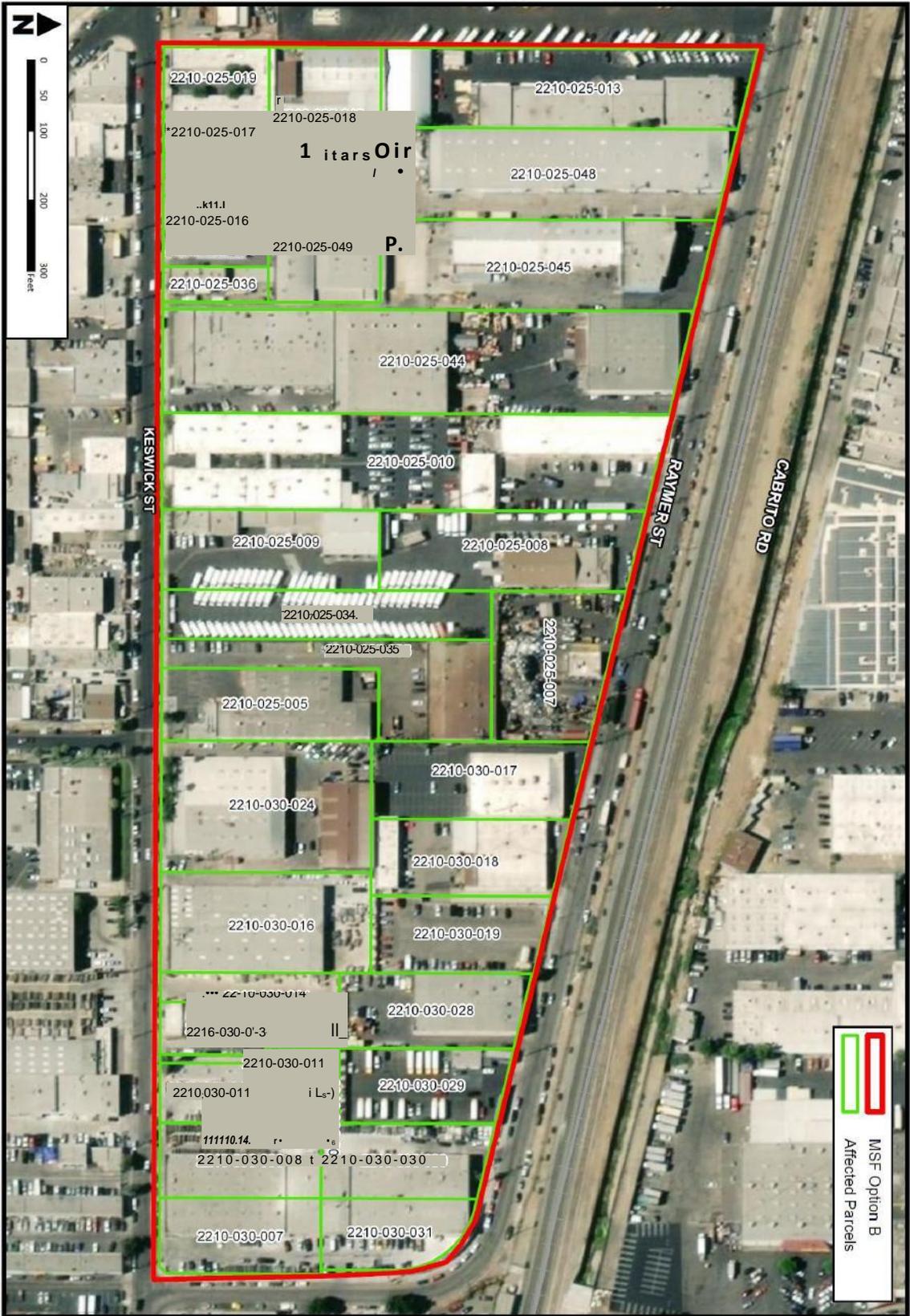
The MSF site must be located  $\frac{1}{4}$  mile or less from the proposed alignment in an industrialized area where the MSF's inherent noise and vibration would have less of an impact on neighboring businesses. The MSF site would also require approximately 25 to 30 acres to provide enough space for storage of the maximum number of train vehicles and accommodate the associated operational needs, such as staff offices, dispatcher workstations, employee break rooms, operator areas, collision/body repair areas, paint booths, and wheel truing machines. Because of the space needs for the MSF, as well as the requirement to be located  $\frac{1}{4}$  mile or less from the proposed alignment, acquisition of between 37 and 58 parcels, depending on the MSF site selected, would be required as follows:

- **MSF Option A:** As shown in Figure 2, MSF Option A would require the full acquisition of 58 parcels between Calvert Street to the north, Oxnard Street to the south, and Kester Avenue to the west. The majority of the properties that would be acquired consist of light manufacturing and commercial properties, most of which contains businesses oriented toward automobile repair and supplies and other general commercial retail uses. However, one parcel is developed with approximately four housing units. These residences and businesses would be displaced under MSF Option A.
- **MSF Option B:** As shown in Figure 3, MSF Option B would require the full acquisition of 37 parcels along Keswick Street and Raymer Street. The majority of the properties that would be acquired consist of light manufacturing and commercial properties, most of which contain businesses oriented toward automobile repair and supplies or raw materials supply and manufacturing. These businesses would be displaced under MSF Option B.
- **MSF Option C:** As shown in Figure 4, MSF Option C would require the acquisition of 42 parcels, including 41 full acquisitions along Arminta Street and Cabrito Road. As with Option B, the majority of the properties that would be acquired consist of light manufacturing and commercial properties oriented toward automobile repair and raw materials supply and manufacturing. These businesses would be displaced under MSF Option C. This option is also immediately adjacent to a number of apartment complexes that appear to be low-income and populated by minority populations.

As stated in the Draft EIR/EIS prepared for the project, the displaced businesses under all of the MSF options, and residences under MSF Option A, are located in minority neighborhoods. However, within the larger surrounding urban area, it is anticipated that there would be enough available properties to accommodate most, if not all, of the displaced businesses and residences.



Figure 3. MSF Option B and Affected Parcels



Source: LA County 2016; ESRI 2018.

Figure 4. MSF Option C and Affected Parcels



## 5. DISPARATE IMPACTS ANALYSIS

Because displacements would primarily affect existing businesses, this analysis incorporates a site-specific percentage analysis (Stanley R. Hoffman Associates, Inc., 2019) to determine the potential for disparate impacts on minority employees and business owners. As stated previously, a disparate impact will be deemed to have occurred if the absolute difference between the percentage of the minority population adversely affected by the MSF and the overall percentage of the minority population in Los Angeles County is at least 5%, or if there is a 20% or greater difference between the percentages of these two groups.

Table 1 includes the absolute and relative differences between the percentages of minority employees and minority business owners for each MSF site, compared to the overall percentages of minority employees and business owners in Los Angeles County. The absolute difference was calculated by subtracting the MSF site percentage by the Los Angeles County percentage. The relative difference was calculated by dividing the absolute difference by the MSF site percentage. As shown in Table 1, none of the MSF sites would result in a disparate impact because the percentages in the MSF sites are lower than Los Angeles County; therefore, the absolute and relative differences would both be negative numbers that are below the thresholds of 5% and 20%, respectively, for disparate impacts.

**Table 1. Minority Employees/Business Owners in MSF Sites and Los Angeles County**

Geographic Area	Percent (%) Minority Employees <sup>a</sup>	Disparate Impact <sup>b</sup>			
		Absolute Difference	At Least 5% Absolute Difference	Relative Difference <sup>c</sup>	20% or Greater Relative Difference
Los Angeles County	51%	--	--	--	--
MSF Option A	32%	-19%	No	-59%	No
MSF Option B	31%	-20%	No	-64%	No
MSF Option C	30%	-21%	No	-60%	No
Geographic Area	Percent (%) Minority Business Owners <sup>a</sup>	Disparate Impact <sup>b</sup>			
		Absolute Difference	At Least 5% Absolute Difference	Relative Difference <sup>c</sup>	20% or Greater Relative Difference
Los Angeles County	74%	--	--	--	--
MSF Option A	70%	-4%	No	-5.7%	No
MSF Option B	69%	-5%	No	-7.1%	No
MSF Option C	70%	-4%	No	-5.7%	No

Source: GPA Consulting; Stanley R. Hoffman Associates, Inc., 2019

**Table Notes:**

- Minority status is defined by race/ethnicity categories of individuals self-identifying as Hispanic and non-Hispanic African-American, Asian and Pacific Islanders, Two or More Races, or Other Non-White race categories.
- A disparate impact will be deemed to have occurred if the absolute difference between the percentage of the minority population adversely affected by the MSF and the overall percentage of the minority population in Los Angeles County is at least 5%, or if there is a 20% or greater difference between the percentages of these two groups.
- The Relative Difference is the Absolute Difference divided by the Percent Minority Employees/Business owners for each MSF option.

**6. PUBLIC OUTREACH**

In compliance with FTA's Circular 4702.1B, Metro engaged in outreach to persons potentially impacted by the siting of the MSF. Following the release of the Draft EIS/EIR, a public comment period was held from September 1, 2017, to October 30, 2017. Five public hearings were held to receive oral and written comments on the environmental document.

During the public comment period, approximately two thousand comments were received (mainly from the unified petition comprised of almost 1,700 business owners, employees, proprietors, customers, and supporters of the businesses) that weighed in solely on the location of the MSF site (ICF International, 2018). Ninety-four (94) percent of these comments expressed opposition to MSF Option A because of the potential for business displacements.

A limited number of comments were received pertaining to Options B and C; however, a letter was received from Los Angeles City Council District 6 which covers this area, in support of Option B. Comments were received in support of a fourth option (not included in the Draft EIS/EIR) that would be on City of Los Angeles Department of Water and Power (LADWP) land to the east of the Van Nuys Metrolink Station. Metro looked at this land but determined that it was more than a  $\frac{1}{4}$ -mile from the alignment and would require navigating through LADWP property to access. In addition, LADWP provided a comment letter stating their intention to use this land for planned expansion as early as 2019 and that it was therefore unavailable.

Through the public outreach efforts conducted for the project, MSF Option B emerged as the site with the highest amount of support for building an MSF, with four (4) percent of all MSF-related comments in support of the Option B site.

In addition to the comments received with regard to the MSF site, the following concerns and comments were most prominently voiced during the public comment period:

- Scarcity of land zoned for industrial uses in the East San Fernando Valley;
- Loss of on-street parking;
- General safety concerns;
- Unfamiliarity with new transit technology (LRT) among existing bus riders along the corridor;
- Loss of bike lanes; and

- Construction-related impacts.

## **7. CUMULATIVE IMPACTS**

As discussed in the Draft EIS/EIR prepared for the project, the study area for the cumulative impacts discussion would encompass the local communities that surround the proposed project alignment. As described above, Build Alternative 4 would result in acquisitions of commercial and industrial properties within the study area. In addition, MSF Option A would result in the acquisition and displacement of one parcel that appears to include four housing units that could require relocation of four families. Metro would comply with the provisions of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, and pay fair market value for properties that are acquired and provide relocation assistance to displaced businesses and residents.

Based on the cumulative projects list, which consists primarily of mixed-use and residential housing developments in residentially zoned areas, there does not appear to be any projects that would result in substantial displacement of businesses or residences. In addition, it is not anticipated that relocated businesses or residences that would be displaced by the project would require construction of a substantial amount of commercial and industrial development or new housing that would result in substantial adverse indirect impacts. As a consequence, the proposed and related projects are not expected to result in substantial adverse cumulative impacts related to displacements.

## **8. MITIGATION MEASURES**

The following measure has been identified to mitigate potential adverse effects from the MSF site, and take into account public sentiment expressed during the public outreach conducted for the project:

MM-CN-1: A formal educational and public outreach campaign shall be implemented to discuss potential community and neighborhood concerns, including relocations, visual/aesthetics changes, and fare policies, and to communicate information about the project with property owners and community members.

In addition, because the study area and surrounding urban area are almost entirely built out and given the number of existing buildings for sale or lease in the immediate area, it is expected that most of the businesses that would be displaced would relocate to existing commercial buildings. Relocation assistance and compensation for displaced businesses and residences would be provided in compliance with existing laws, which include the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and the California Relocation Act.

## **9. CONCLUSIONS**

The Metro Board approved Build Alternative 4 (median-running LRT) with MSF Option B as the locally preferred alternative on June 28, 2018. Therefore, this analysis is a retroactive analysis as set forth in FTA's Circular 4702.1B. The Draft EIR/EIS prepared for the project incorporated an Environmental Justice Impacts Report that included a study of the racial and poverty characteristics of the population that would be affected by the proposed MSF (FTA and Metro, 2017). Because displacements would primarily

affect existing businesses, this Title VI Equity Analysis incorporates a site specific percentage analysis (Stanley R. Hoffman Associates, Inc., 2019) to determine the potential for disparate impacts on minority employees and business owners on the basis of race, color, or national origin.

Based on the site-specific percentage analysis conducted for the project, none of the MSF sites would result in a disparate impact because the percentages of minority employees and business owners in the MSF sites are lower than Los Angeles County; therefore, the absolute and relative differences would both be negative numbers that are below the thresholds of 5% and 20%, respectively, for disparate impacts.

MSF Option B was chosen as the locally preferred alternative because this site is strategically located at the mid-point of the alignment and is the only option which does not substantially affect residential properties. During the public comment period for the Draft EIS/EIR prepared for the project, substantial opposition to Option A (adjacent to the Metro Orange Line) was expressed by the community, while Option B was the only MSF option that received support comments, including letters from a local Los Angeles City Councilmember and Panorama City Neighborhood Council. It is unknown at this time if the future Sepulveda Transit Corridor can share the Option B MSF, as that project is in the early phase of a Feasibility Study in which alignments and modes are under preliminary evaluation.

In summary, this Title VI equity analysis includes a comparison of the equity impacts of various siting alternatives, and concludes that MSF Option B was selected without regard to race, color, or national origin. Therefore, the selection of MSF Option B as the locally preferred alternative has been conducted in compliance with DOT's Title VI regulations.

## 10. REFERENCES

- FTA and Metro. (2017, August). *Draft Environmental Impact Statement/Draft Environmental Impact Report for the East San Fernando Valley Transit Corridor*. Retrieved from [https://media.metro.net/projects\\_studies/east\\_sfv/images/deis-deir/esfv\\_DEIS-DEIR.pdf](https://media.metro.net/projects_studies/east_sfv/images/deis-deir/esfv_DEIS-DEIR.pdf)
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## REQUIREMENTS FOR FIXED ROUTE PROVIDERS

### 10. 2019 Systemwide Service Standards

#### Passenger Loading

Proposed passenger loading standards are summarized in Table A-1. The standard expresses the maximum average ratio of passengers to seats *by direction* for a one-hour period by time of day *and should not be exceeded for at least 95% of all hourly periods.*

	Peak Passengers/seat	Off-Peak Passengers/seat
Heavy Rail	2.30	2.30
Light Rail	1.75	1.75
BRT	1.30	1.30
Rapid	1.30	1.30
Express	1.30	1.30
All Other Bus	1.30	1.30

**Table A-1  
Passenger Loading Standards**

#### Headways

Current headway standards are summarized in Table A-2. The headway standards provide for the maximum scheduled gap (in minutes) between trips *in the peak direction of travel* at the maximum load point of a line by time of day *and should not be exceeded for at least 90% of all hourly periods.*

	Peak	Off-Peak
Heavy Rail	10	20
Light Rail	12	20
BRT	12	30
Rapid	20	30
Express	60	60
Limited	30	60
All Other Bus	60	60

**Table A-2**

## Headway Standards

### On-Time Performance

On-time performance standards are based on the Board adopted fiscal year budget target for bus, light rail and heavy rail. The standards provide for the minimum desired percentage of time point departures that are between one minute early and five minutes late (excluding terminal departures). *This standard is to be revised to establish that 90% of lines achieve at least 90% of the adopted budget target for the fiscal year.*

### Stop Spacing

Proposed stop spacing standards are shown in Table A-3. The standards provide for the average stop spacing in miles by type of service *and spacing should fall within 0.1 mile of the specified average at least 90% of the time.*

Heavy Rail	1.50
Light Rail	1.50
BRT	1.25
Rapid	0.75
Express	1.25
All Other Bus	0.30

**Table A-3**  
**Average Stop Spacing Standards (in miles)**

### Accessibility

The current accessibility standard is shown in Figure A-1. The standard ensures the availability of fixed route service to virtually all residents of Metro's service area while limiting duplication of service by using services operated by others to achieve the standard.

*Service is to be provided within ¼ mile of 99% of Census tracts within Metro's service area having at least 3 households per acre and/or at least 4 jobs per acre. Fixed route service provided by other operators may be used to meet this standard.*

**Figure A-1**  
**Accessibility Standard**

## Passenger Amenities Policy

The current passenger amenities policy is shown in Figure A-2. The standard applies to all off-street facilities owned by Metro that permit passenger boardings.

Shelters:	HR – not applicable LR – at least 80 linear ft. Bus – at least 6 linear ft. per bay
Seating:	HR – at least 12 seats LR – at least 10 seats Bus – at least 3 seats per bay
Info Displays:	HR – at least 12 LR – at least 10 Bus – at least 3
LED Displays:	HR – at least 8 arrival/departure screens LR – not applicable Bus – not applicable
TVMs:	HR/LR = at least 2 Bus – not applicable
Elevators:	HR – at least 2 LR – at least 1 for elevated/underground Bus – at least 1 for multi-level terminals
Escalators:	HR – at least 4 (2 Up / 2 Down) LR – not applicable Bus – not applicable
Waste Receptacles:	HR – at least 6 LR – at least 2 Bus – at least 1 per 3 bays / 2 minimum

**Figure A-2**  
**Passenger Amenities Policy**

### **Vehicle Assignment Policy**

The current vehicle assignment policy is shown in Figure A-3.

Heavy Rail:	Not applicable – only one line and one vehicle type
Light Rail:	Vehicles will be assigned to individual lines on the basis of compatibility of vehicle controllers with each line’s signal system. The number of vehicle types/manufacturers will be kept to no more than two at any facility to minimize parts storage and maximize maintenance expertise.
Bus:	Vehicles will be assigned to individual facilities on the basis of vehicle size requirements for lines supported by each facility.

**Figure A-3  
Vehicle Assignment Policy**

## **11. Monitoring of Transit Service Results**

### **2019 Review of Service Policies and Standards for FY2017 – FY2019**

As required by Federal Transit Administration (FTA) Circular 4702.1B (Chapter IV-9, Section 6) agencies must monitor service, at least once every three years, and present the results to the Board of Directors for approval. This is a review of Metro’s compliance with specified service standards and policies under the requirement. The review covers the past three years from the last Title VI Program Update.

The following topics are addressed:

1. Service Availability
2. Classification of Services
3. Headway Standards
4. Loading Standards
5. On-Time Performance Standards
6. Passenger Amenities Standards
7. Vehicle Assignment Standards

All reviews assess whether Metro has complied with its policies and standards, and whether any non-compliance is biased toward minorities (disparate impact) or persons in Low-Income (disproportionate burden).

#### **1. Service Availability**

The adopted service availability standard is:

At least 99% of all Census tracts within Metro's service area having at least 3 HH/acre and/or 4 jobs/acre shall be within one quarter mile of fixed route service (a bus stop or rail station).

Fixed route service provided by other operators may be used to meet this standard. The use of other operator services to meet this standard ensures maximum availability without unnecessary duplication of service.

**Results:** There are 1,892 tracts within Metro’s service area that meet the above thresholds of 3 HH/acre and/or 4 jobs/acre. Only 10 of these tracts are not within one-quarter mile of fixed route service. This is a service availability of 99.47%.

#### Service Area Demographics - Minorities

	Service Area	Tracts Not Served
Population	9,665,120	40,140
Minority Population	6,669,203	26,354
Minority Share	69.00%	65.66%

#### Service Area Demographics – Low-Income

	Service Area	Tracts Not Served
Population	9,813,599	39,494
Low-Income Population	1,647,760	5,093
Low-Income Share	16.79%	12.90%

**Results:** Both the minority share, and low-income share of the unserved tracts are less than the service area minority and Low-Income shares. Therefore, there is no disparate impact or disproportionate burden created by the unserved areas.

## 2. Classification of Services

The review of service policies and standards requires determination of Minority routes (and Low-Income routes) so that a comparison of compliance between Minority (or Low-Income) routes and all routes may be made. If the share of Minority routes meeting a standard is an absolute 5% or more less than the share of all routes meeting a standard, then a disparate impact on Minority routes has occurred. If the share of Low-Income routes meeting a standard is an absolute 5% or more less than the share of all routes meeting a standard, then a disproportionate burden on Low-Income routes has occurred.

FTA has defined a Minority route as having one-third or more of its revenue miles operated in census areas that exceed the service area minority share of population. By extension, a Low-Income route will have one-third or more of its revenue miles operated in census areas that exceed the service area low-income share of population.

**Results:** There are 141 fixed route bus lines operated by Metro. It was determined that 108 of these are Minority lines (76.60%), and 115 of these are Low-Income lines (81.56%). Both Heavy Rail lines are Minority and Low-Income lines. All four Light Rail lines are Minority lines and Low-Income lines.

These definitions were used to stratify compliance levels in the subsequent evaluations.

## 3. Headway Standards

Current service standards were last adopted in FY16. The adopted headway standards follow:

Rail Headway Standards

Mode	Peak Max. ( in min)	Off-Peak Max (in min)
Heavy Rail	10	20
Light Rail	12	20

Not to be exceeded for at least 90% of all hourly periods

Bus Headway Standards

Service Type	Peak Max. ( in min)	Off-Peak Max (in min)
Local	60	60
Limited	30	60
Express	60	60

Shuttle	60	60
Rapid	20	30
BRT	12	30

Not to be exceeded for at least 90% of all hourly periods

**Results:** Compliance determination used service in effect as of June 23, 2019 which is the most recent service change program. All rail lines were in full compliance with the adopted standards for weekdays, Saturdays, Sundays and Holidays.

Weekday Headway Compliance - # of Bus Lines

	All Lines	Minority Lines Only	Low-Income Lines Only	All Compliance	Minority Compliance	Low-Income Compliance
Meets Standard	101	81	87	72.1%	75.7%	76.3%
Exceeds Standard	39	26	27			

Saturday Headway Compliance - # of Bus Lines

	All Lines	Minority Lines Only	Low-Income Lines Only	All Compliance	Minority Compliance	Low-Income Compliance
Meets Standard	78	60	66	70.9%	76.6%	77.6%
Exceeds Standard	32	22	24			

Sunday & Holiday Compliance - # of Bus Lines

	All Lines	Minority Lines Only	Low-Income Lines Only	All Compliance	Minority Compliance	Low-Income Compliance
Meets Standard	76	59	66	73.1%	75.7%	76.3%
Exceeds Standard	28	18	19			

**Results:** Minority and Low-Income bus lines exhibited higher rates of compliance with the headway standards than all lines together. Certain patterns of non-compliance were evident. Late evening and weekend services were most likely to exceed the base service standards. As service has been scheduled to demand, services with hourly or near hourly headways to begin with are now operating at wider than 60-minute headways. Rapid bus lines were frequently in non-compliance because the 30-minute base headway is a policy standard while those services have increasingly been scheduled to demand.

A systemwide restructuring study is nearing completion and is expected to change headway standards, and to significantly improve compliance.

#### 4. Loading Standards

Current service standards were adopted in FY16. The adopted passenger loading standards follow:

Rail Passenger Loading Standards

Mode	Peak Passengers/Seat	Off-Peak Passengers/Seat
Heavy Rail	2.30	1.60
Light Rail	1.75	1.25

Not to be exceeded for at least 95% of all hourly periods

Bus Passenger Loading Standards

Service Frequency (in min)	Peak Passengers/Seat	Off-Peak Passengers/Seat
1-10	1.40	1.30
11-20	1.30	1.25
21-40	1.20	1.10
41-60	1.10	1.00
60+	1.00	0.75

Not to be exceeded for at least 95% of all hourly periods

Although a headway of greater than 60 minutes would be an exception to the headway standards a loading standard is provided for such services when they occur.

The rail system is only beginning to receive Automated Passenger Counters (APC's), and they are still being calibrated. Load monitoring can only be done on a sampling basis. Checkers ride randomly selected cars on randomly selected trips recording data for Ons and Offs by station. Over a six-month sliding time frame this data is aggregated to build a profile of rail ridership, and is the primary source for ridership estimation by day type and line. While only one car is monitored on any given sample trip, whether or not that car meets the loading standard is a surrogate for whether trains are meeting the standard. Loading on the bus system is monitored every six months using quarterly APC data for max loads at time points. Since the most recent bus load standard evaluation was performed using January through March 2019 data, the samples collected from rail ride checks were compiled for the same three months.

Each rail ride check record was processed using Line # (determines mode and applicable # of seats), day type, trip start time (used to categorize weekday trips as peak or off peak), and max accumulated load (calculated from the observations in each check). A rail mode is assumed to comply with the loading standards if 95% of all monitored trips conform to the standards. Data is from the period January through March 2019 which is the same time frame used for bus monitoring.

**Weekday Rail Load Standard Monitoring**

	Peak			Base		
	# of Checks	Within Standard	% Compliance	# of Checks	Within Standard	% Compliance
Heavy Rail	1,454	42	97.1%	2,447	54	97.8%
Light Rail	1,024	29	97.2%	1,750	27	98.5%

**Weekend Rail Load Standard Monitoring**

	Saturday			Sundays & Holidays		
	# of Checks	Within Standard	% Compliance	# of Checks	Within Standard	% Compliance
Heavy Rail	670	6	99.1%	606	3	99.5%
Light Rail	646	18	97.1%	635	4	99.4%

**Results:** Both modes met the standard at least 95% of the time, and each line was in compliance at all times, as well.

Bus monitoring is more extensive as all buses are equipped with APC's, and data is available for all time points along each bus route for observed max loads by trip. Every six months the most recent quarterly data is evaluated to determine adherence with the adopted standards. The most recent evaluation used January through March 2019 data.

**Bus Load Standard Monitoring**

Day Type	# of Lines	Directional Hours Monitored	Exceptions
Weekdays	140	5,315	
Saturdays	110	4,315	1
Sundays/Holidays	104	4,058	1

**Results:** Line 16 Eastbound exceeded the standards between Midnight and 1am on Saturdays, and Line 53 Northbound exceeded the standards between 7am and 8am on Sundays. As only one directional hour exceeded the loading standard in each instance over 97% of the hours operated on each line on those days conformed to the standards. Therefore, all bus lines in the system were found to be in conformance with the adopted loading standards.

**5. On-Time Performance Standards**

The current on-time performance standards for the system define on-time as no more than one minute early or five minutes late when leaving a time point. In the currently adopted standard both rail and bus have the same objective: 80% on-time on at least 90% of lines at least 90% of the time.

Rail is currently monitored using NextTrain. Since bus is evaluated every six months using quarterly data this evaluation was performed on the same basis. Data for the months of January through March 2019 was compiled.

Weekday Rail On-Time Performance

Mode	# of Time Point Observations	# of On-Time Observations	On-Time Percentage
Heavy Rail	85,400	76,825	90.0%
Light Rail	353,029	259,004	73.4%

Saturday Rail On-Time Performance

Mode	# of Time Point Observations	# of On-Time Observations	On-Time Percentage
Heavy Rail	22,028	18,931	85.9%
Light Rail	72,256	54,084	74.9%

Sundays & Holidays Rail On-Time Performance

Mode	# of Time Point Observations	# of On-Time Observations	On-Time Percentage
Heavy Rail	46,270	41,999	90.8%
Light Rail	146,974	111,970	76.2%

**Results:** Heavy Rail consistently exceeds the 80% on-time objective largely because it operates entirely in a grade separated environment. Light Rail, except for the Green Line (which was 84.2% on-time on weekdays), operates with significant portions at grade. Even on weekends with somewhat lesser traffic conflicts light rail falls short of the 80% objective. Since all rail lines were classified as Minority lines and Low-Income lines there is no disparate impact or disproportionate burden resulting from this finding.

On the bus side we also see on-time performance consistently short of the 80% objective. The following observations are based upon three months of data from January through March 2019.

Bus Weekday On-Time Performance

	All Lines	Minority Lines	Low-Income Lines
Avg On-Time %	72.62%	72.02%	72.20%
Lines Meeting Std	25	18	18
Lines Failing Std	112	85	93
% Meeting Std	18.25%	17.48%	16.22%

Bus Saturday On-Time Performance

	All Lines	Minority Lines	Low-Income Lines
Avg On-Time %	73.65%	73.12%	73.21%
Lines Meeting Std	21	11	12
Lines Failing Std	86	67	75

% Meeting Std	19.63%	14.10%	13.79%
---------------	--------	--------	--------

**Bus Sunday & Holiday On-Time Performance**

	All Lines	Minority Lines	Low-Income Lines
Avg On-Time %	78.90%	78.62%	79.01%
Lines Meeting Std	46	30	35
Lines Failing Std	55	43	47
% Meeting Std	45.54%	41.10%	42.68%

**Results:** On any given day, non-Minority, non-Low-Income, Minority, and Low-Income bus lines exhibit similar on-time percentages. On Sundays and Holidays the average on-time percentage approaches the 80% objective. Except for Saturdays, the on-time share of Minority and Low-Income bus lines is within 5% of the share of all bus lines meeting the standard. On Saturdays we observe both a disparate impact on minority bus line users, and a disproportionate burden on Low-Income bus line users. The Saturday share of bus lines meeting the standard in each of these categories is more than 5% less than the overall compliance share. Of the lines meeting the on-time standard on Saturdays that are not Minority or Low-Income, most operate in uncongested traffic corridors and about half of them are in the San Fernando Valley.

Metro has been undertaking a detailed evaluation of its entire bus system (termed NEXGEN) for the past two years with the objective of completely redefining routes and operating standards. As a part of this effort the most congested bus corridors (where bus speeds are most severely impacted) have been subjected to detailed field work and evaluation in order to identify traffic improvements such as bus-only lanes, queue jumps, stop relocation, etc. that would significantly improve bus speed, and reliability. A preliminary program of projects has been developed for the studied corridors. Metro will be working with the affected communities to agree on an implementation program and identify funding for its completion. The majority of the studied corridors are served by Minority and Low-Income bus lines.

**6. Passenger Amenities Standards**

A set of passenger amenities standards were incorporated in the FY16 update of Metro’s Service Policies. Those standards are presented here.

**Heavy Rail Passenger Amenities Standards**

<b>Amenity</b>	<b>Allocation</b>
Seating	At least 12 seats
Info Displays	At least 12
LED Displays	At least 8 Arrival/Departure screens
TVM’s	At least 2
Elevators	At least 2
Escalators	At least 4 (2 Up / 2 Down)
Trash Receptacles	At least 6

Applies to each station

**Light Rail Passenger Amenities Standards**

<b>Amenity</b>	<b>Allocation</b>
Shelters	At least 80 linear feet per bay
Seating	At least 10 seats
Info Displays	At least 10
TVM's	At least 2
Elevators	At least 1 for elevated / underground
Trash Receptacles	At least 2

Applies to each station

#### Bus Passenger Amenities Standards

<b>Amenity</b>	<b>Allocation</b>
Shelters	At least 6 linear feet per bay
Seating	At least 3 seats per bay
Info Displays	At least 3
Elevators	At least 1 for multi-level terminals
Trash Receptacles	At least 1 per 3 bays / 2 minimum

Applies to off-street bus facilities serving 4 or more bus lines

There are no standards for bus stops because apart from painting the curb Red and erecting bus stop signage, Metro has no jurisdiction over street sitting fixtures or other appurtenances. The latter are controlled by individual cities and often contracted to third parties who support their costs through advertising revenues.

**Results:** Since the last three-year monitoring when all applicable facilities were in full compliance with these standards, the El Monte bus terminal has been reconstructed in conformance with these standards. No new facilities have been added.

## 7. Vehicle Assignment Standards

Adopted vehicle assignment standards include:

**Heavy Rail:** Maintained at a single facility

**Light Rail:** Primarily assigned based on compatibility of vehicle controllers with rail line(s) served. Wherever possible, no more than two vehicle types at each facility.

**Bus:** Assigned to meet vehicle seating requirements for lines served from each facility.

While these standards are consistently applied we have historically looked at the average age of vehicles assigned to each facility to ensure that there are no extremes serving any specific area. This is most applicable to the bus system, but the data for rail is provided as well.

Heavy Rail – Vehicle Age by Facility

Model	# Active	Average Age (years)
Breda 650 Base	30	26.4
Breda 650 Option	74	20.6
	<b>104</b>	<b>22.3</b>

Light Rail – Vehicle Age by Facility

Facility	Model	# Active	Average Age (years)
Div 11 – Long Beach	Nippon Sharyo 2020	15	24.5
	Siemens 2000 GE/ATP	7	17.1
	Kinkisharyo P3010	54	1.6
		<b>76</b>	<b>7.5</b>
Div 14 – Santa Monica	Siemens 2000 GE/ATP	15	15.9
	Kinkisharyo P3010	56	1.1
		<b>71</b>	<b>4.2</b>
Div 21 – Los Angeles	AnseldoBreda2550Base	15	8.6
	Kinkisharyo P3010	3	2.0
		<b>18</b>	<b>7.5</b>
Div 22 - Lawndale	Siemens 2000 Base	24	17.9
	Kinkisharyo P3010	21	0.6
		<b>45</b>	<b>9.8</b>
Div 24 - Monrovia	AnseldoBreda2550Base	35	10.0
	Kinkisharyo P3010	43	1.3
		<b>78</b>	<b>5.2</b>

**Results:** A couple of constraints apply to the light rail assignments. The Siemens 2000 Base vehicles may only operate from Div 22 (Green Line) because their controller package is not compatible with other lines. The AnseldoBreda2550Base vehicles may not be operated from Div 22 as they are too heavy for the Green Line. Each facility’s average vehicle age is between 4 and 10 years which is consistently young for vehicles that should have a 30-year life span.

Bus – Vehicle Age by Facility – Directly Operated

Division	32-foot	40-foot	45-foot	60-foot	# of Buses	Avg. Age
1		141	35	21	197	9.3
2		174			174	7.8
3		86	88		174	9.0
5		138	7	48	193	7.1
7		140	64	6	210	7.2
8		61	101	34	196	9.1
9		162	56		218	9.1
10		73	14	80	167	9.4
13		72		87	159	9.2
15		87	99	50	236	10.3

18		73	99	61	233	9.4
		<b>1,207</b>	<b>563</b>	<b>387</b>	<b>2,157</b>	<b>8.9</b>

Bus – Vehicle Age by Facility – Purchased

Division	32-foot	40-foot	45-foot	60-foot	# of Buses	Avg. Age
95	16	19	4		39	7.3
97	5	69			74	1.2
98	29	24	8		61	6.9
	<b>50</b>	<b>112</b>	<b>12</b>		<b>174</b>	<b>4.5</b>

Bus – Vehicle Age Summary

	32-foot	40-foot	45-foot	60-foot	# of Buses	Avg. Age
	<b>50</b>	<b>1,319</b>	<b>575</b>	<b>387</b>	<b>2,331</b>	<b>8.6</b>

**Results:** The only extreme average age is that of Division 97 operated by a contractor who recently had their older fleet replaced with new buses. This division serves seven bus lines of which six are Minority lines and five of which are Low-Income lines. With that knowledge there appears to be no basis for a finding of biased bus assignments based upon age.

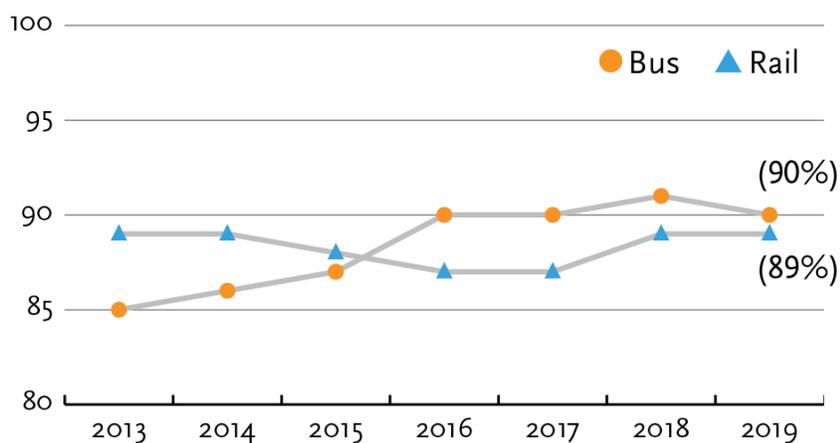
In conclusion, the results of the service monitoring indicate that the adopted systemwide standards are set properly with the exception of a few. Based on the results, Metro staff will be making minor adjustments to the service standards and will present them for Board approval to be included in the 2019 Title VI Program Update to be submitted to FTA.

## 12. Collection and Reporting of Demographic Data

Metro Research has been fielding an on-board customer satisfaction survey of Metro bus and rail lines at least once a year since 2003. This survey allows Metro to track changes in rider satisfaction levels, access to and knowledge of Metro resources, perceptions of safety and cleanliness, and other useful data for Metro’s Planning Department, Metro Operations, Governance Councils, Government Relations, Media Relations, and the Office of the CEO. It also contains demographic questions, which are vital for ensuring Title VI compliance and allow Metro to better serve a diverse Los Angeles County.

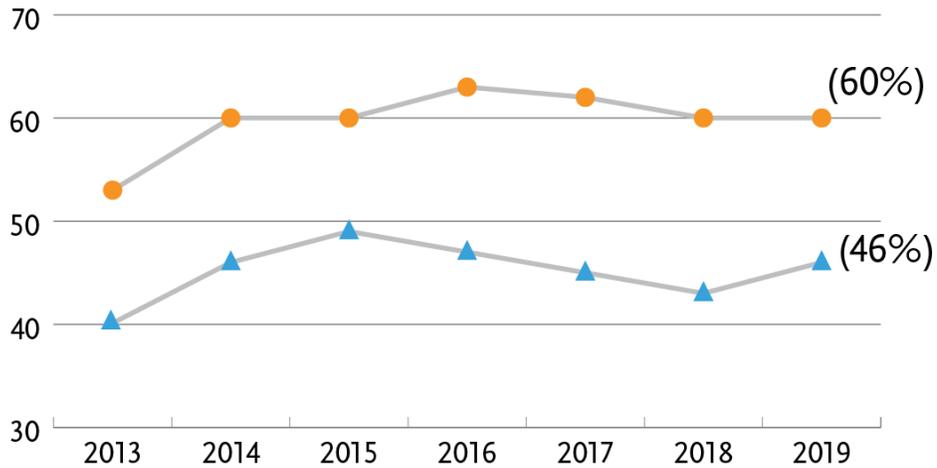
The survey is available in 12 languages, has a response rate over 50 percent, covers 97 percent of Metro’s average weekday ridership, and has an estimated error rate of under 2 percent. Comparing our results year over year allows us to further check the accuracy of the numbers and see trends within survey results. Some of these trends are listed in the following section. Since the survey began 16 years ago, bus rider satisfaction had never matched or surpassed rail satisfaction. However, in the Spring 2016 survey, bus rider satisfaction surpassed rail rider satisfaction by two percent and has remained that way in all subsequent surveys. In 2019, the bus and rail satisfaction rates are effectively equal. Although the gap lessened in 2019, bus satisfaction surpassed rail satisfaction in all component areas except for on-time performance and station/stop cleanliness.

### I am generally satisfied with Metro Service:



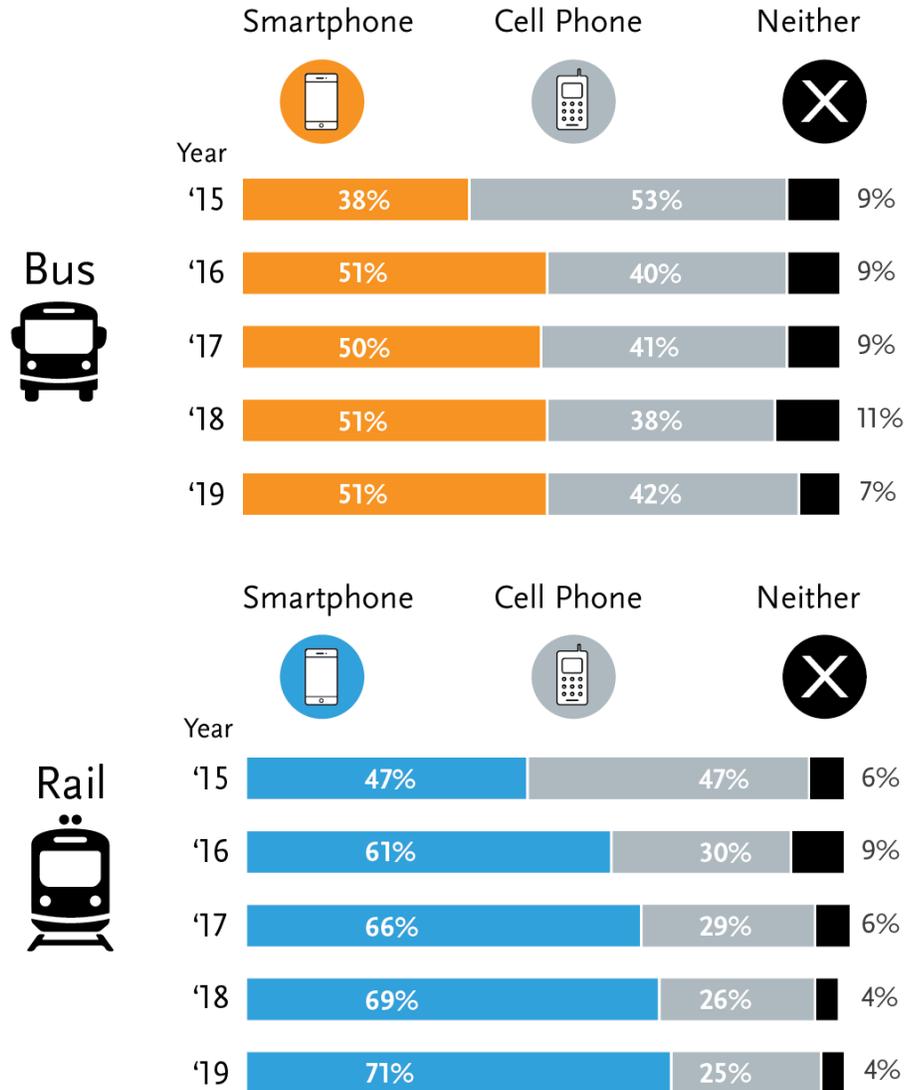
Over the years Metro has also asked riders how long they have been riding the system. This allows us to track how well we are retaining long term users, and how changes or new lines affect our riders. As you can see in the chart below, from 2016 to 2018, the percentage of rail riders who have been riding for 5 or more years dipped. This coincides with the extension of the Expo and Gold Lines, which brought in new riders to the system, as well as the drop in Blue Line ridership. Meanwhile, bus tenure has leveled off after dropping slightly in 2016.

I have been riding Metro for 5+ years: ● Bus ▲ Rail



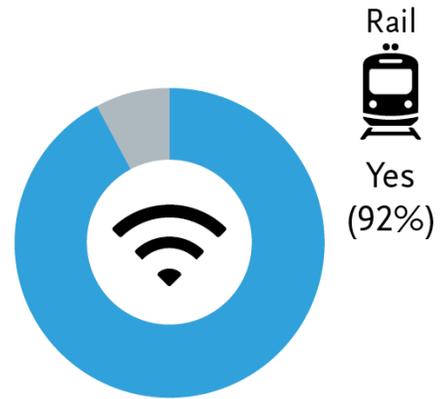
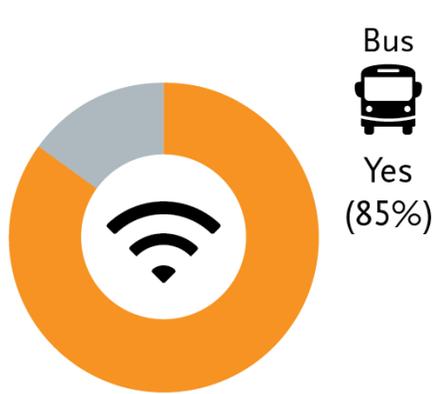
Another trend that has emerged over the years is an increase in smartphone ownership amongst Metro's ridership. Having access to a smartphone makes providing transit alerts, arrival time information, and customer outreach much easier. While growth in smartphone ownership for bus riders has been stagnant for the last 4 years, it is still 13 percent higher than in 2015. Meanwhile, rail has seen this percentage increase by 24 percent, and both have seen those with no access to a cell phone or smartphone decrease.

## What type of mobile device do you own?

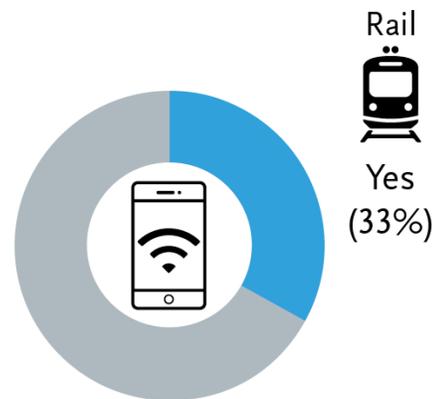
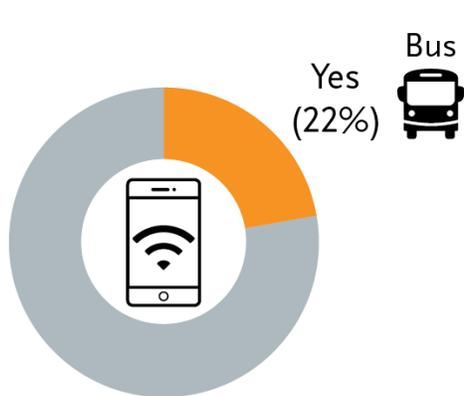


We expect overall smartphone ownership to increase for both bus and rail in the coming years and added a question about internet access at home for our riders in our most recent survey. These two questions should allow Metro to better track how accessible online surveys and real-time information are to our ridership. The results for this question, included below, show that the vast majority of our ridership has access to the internet at home, but the percentage of them who have both a smartphone data plan and high-speed internet is far lower.

Do you or any member of your household have access to the internet?



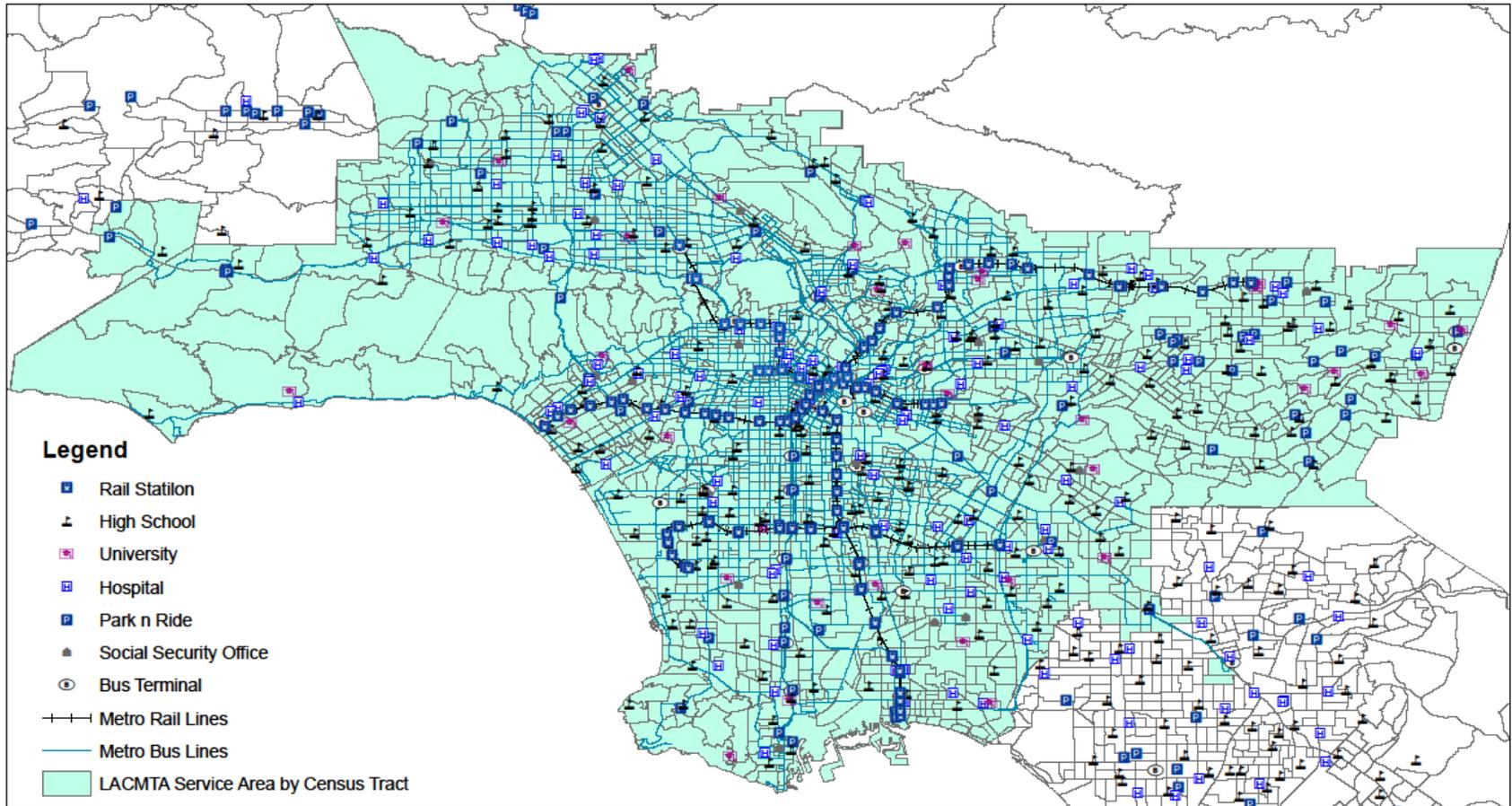
Do you or any member of your household have access to high-speed internet and a smartphone data plan?



	Minority	Low-Income
Ridership	80%	64%
Population	69%	21%



## Title VI Monitoring: LACMTA Transit Service Per June 2019 Service Change

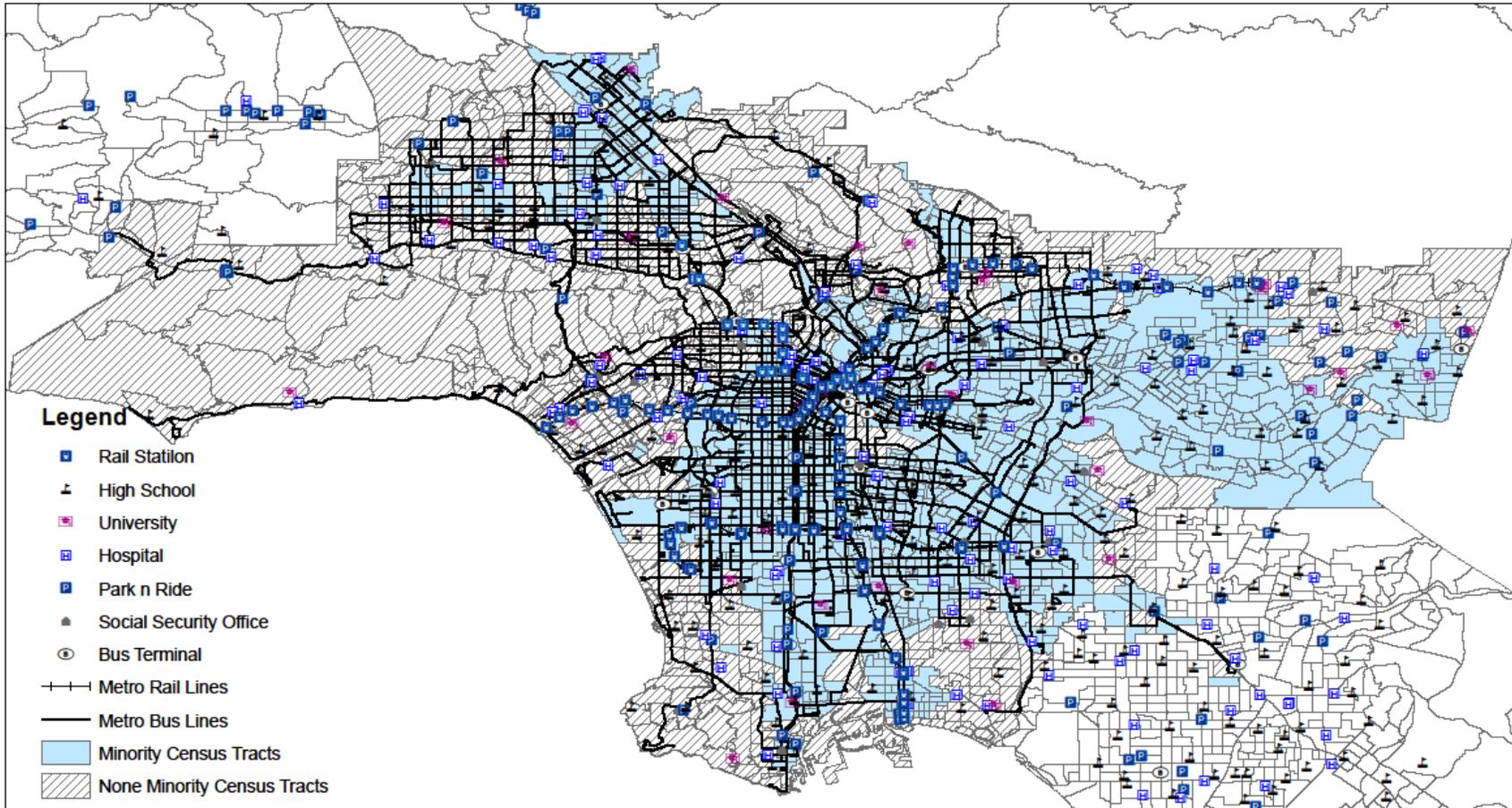


Prepared by Metro Service Planning and Scheduling

September, 2019



# Title VI Monitoring: LACMTA Transit Service with Minority Census Tracts Per June 2019 Service Change

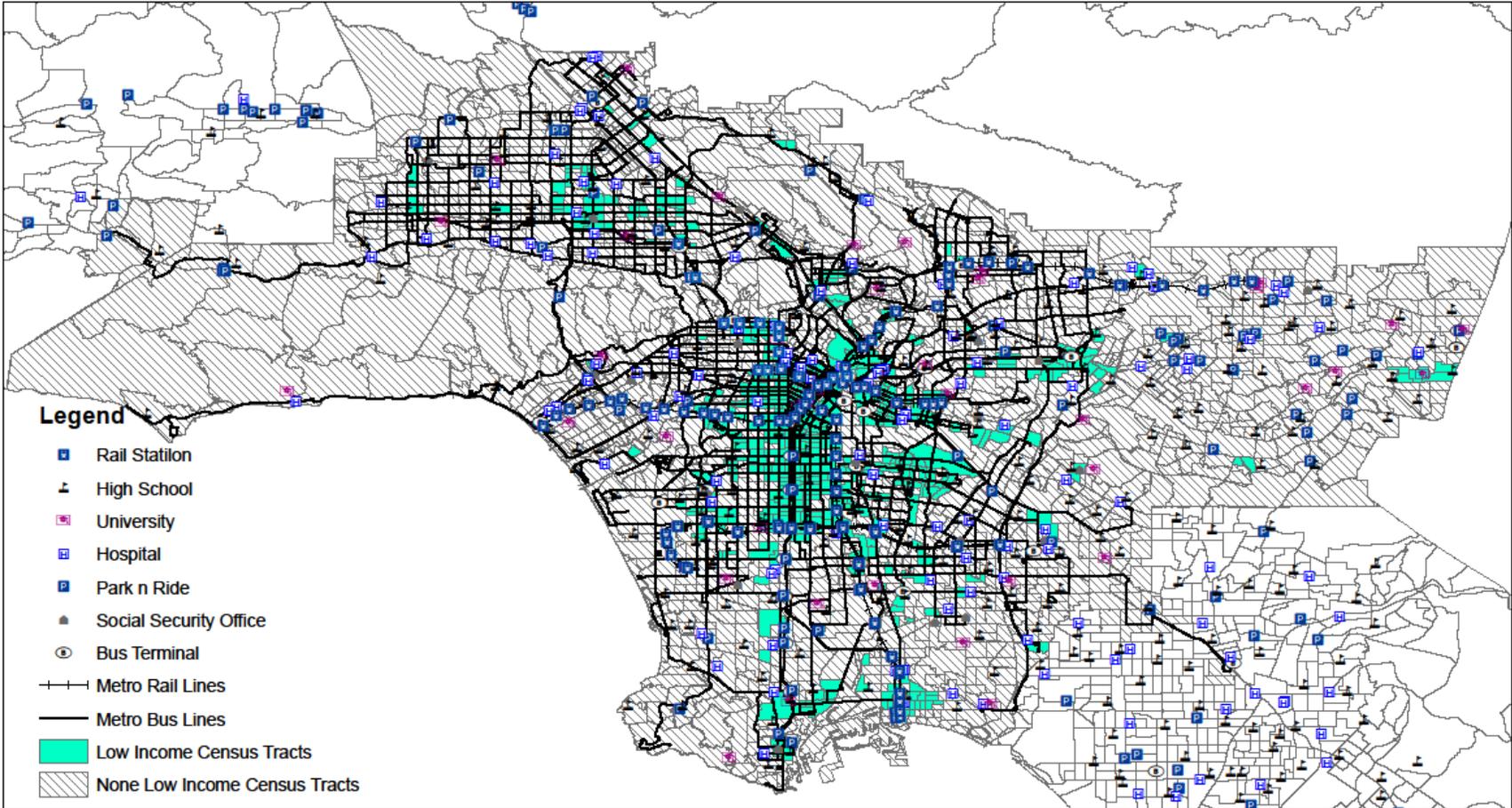


Prepared by Metro Service Planning and Scheduling

September, 2019



# Title VI Monitoring: LACMTA Transit Service with Low Income Census Tracts Per June 2019 Service Change

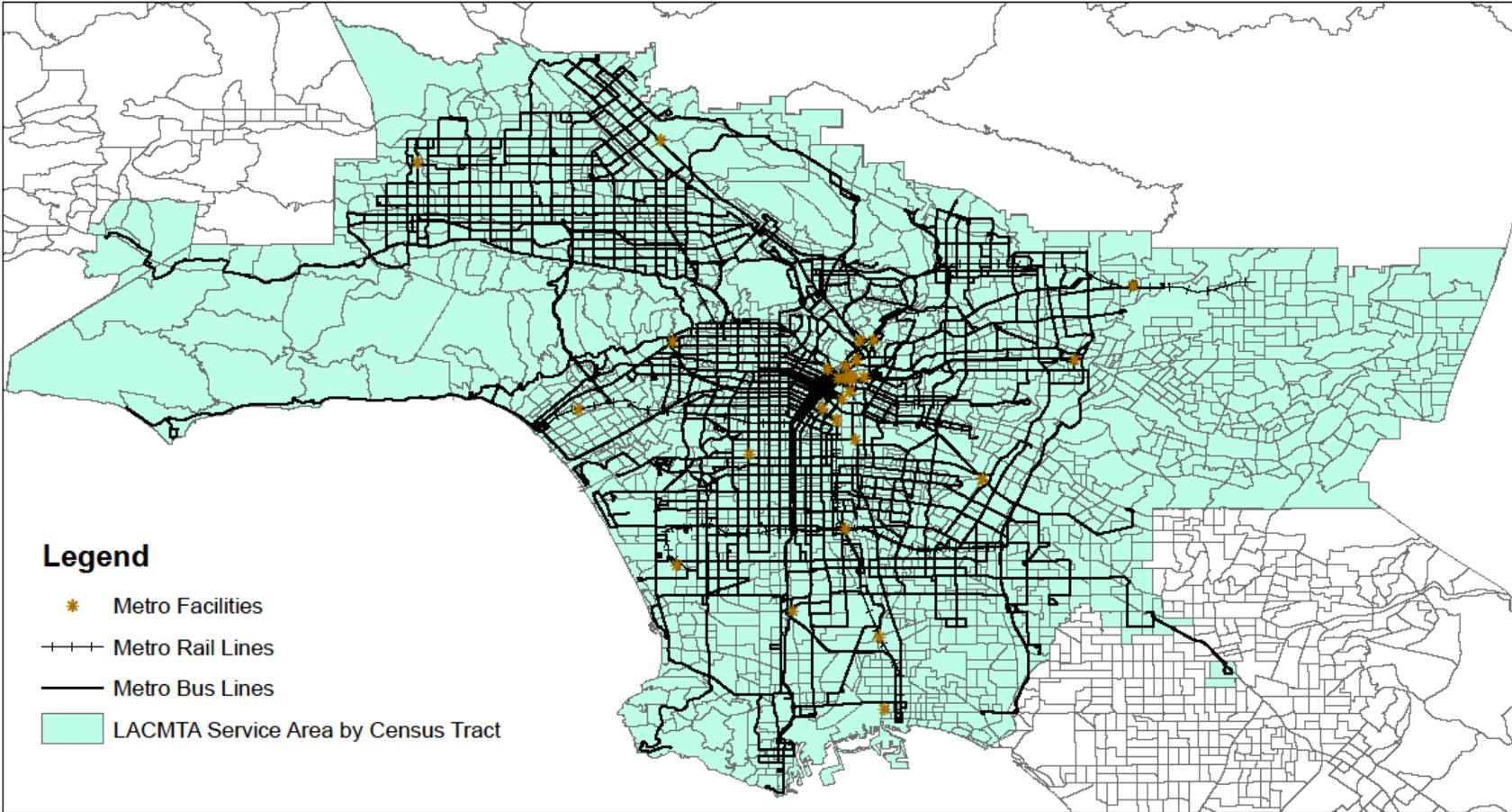


Prepared by Metro Service Planning and Scheduling

September, 2019



# Title VI Monitoring: LACMTA Transit Facilities Map with Metro Transit Lines

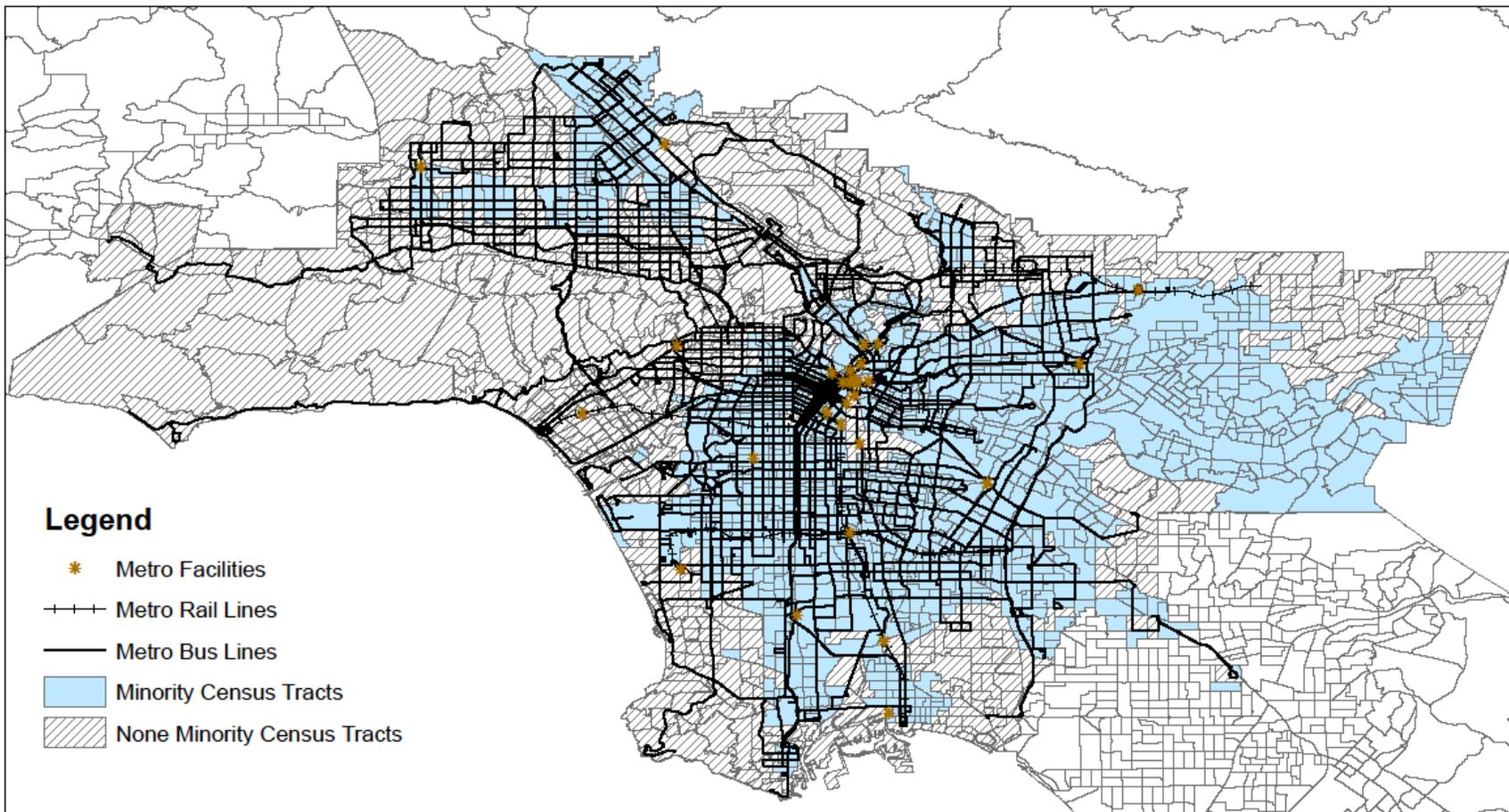


Prepared by Metro Service Planning and Scheduling

September, 2019



## Title VI Monitoring: LACMTA Transit Facilities Map with Metro Transit Lines Overlaid with Minority Census Tracts

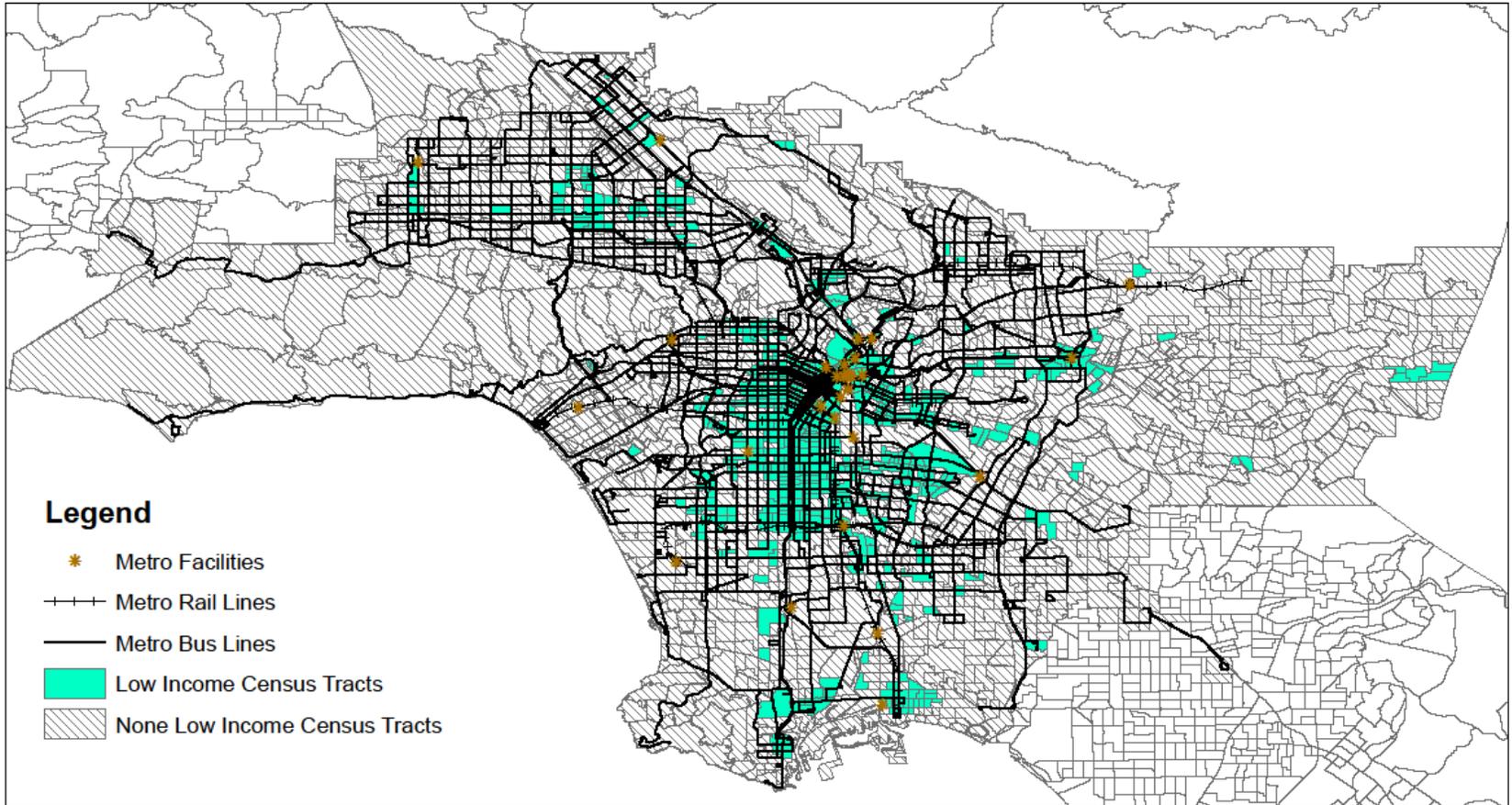


Prepared by Metro Service Planning and Scheduling

September, 2019



## Title VI Monitoring: LACMTA Transit Facilities Map with Metro Transit Lines Overlaid with Low Income Census Tracts



Prepared by Metro Service Planning and Scheduling

September, 2019

### **13. Equity Analyses of Service and Fare Changes**

Since October 2016, Metro conducted the following Service and Fare Equity Analyses:

#### **Service Equity Analyses**

Metro Bike Share Program Expansion.

#### **Fare Equity Analyses**

A. REPLACE Day Pass sales onboard bus with ability to purchase Stored Value and Metro base fare onboard bus; B. ELIMINATE tokens and transition to TAP; C. IMPLEMENT a consistent \$2 fee for TAP cards system-wide; and D. FIND that the proposed change in adding Stored Value sales aboard buses results in a Disparate Impact (See Attachment D) but there is substantial legitimate justification for the proposed change and there are no alternatives that would have a less disparate impact on minority riders.

## **Service Equity Analysis**

### **Equity Analysis**

#### **Methodology & Results**

#### **Proposed Bike Share Program**

#### **Siting of Program Locations**

**October 2017**

**Revised February 2018**

#### **Service Planning and Scheduling**

#### **Civil Rights Programs Compliance**

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## **1. PROPOSAL OVERVIEW**

Metro's countywide bike share program has developed a five phase plan for implementing the bike share program in 40 community areas. Participants would be able to rent and return a bicycle from any of the program's self service locations. The first two phases of the program have been implemented, and were previously evaluated for Title VI and Environmental Justice impacts. This document's evaluation considers the overall program. This evaluation compares the demographics of those community areas that would benefit from the program with the demographics of Los Angeles County.

## **2. METHODOLOGICAL APPROACH**

Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.) prohibits discrimination on the basis of race, color, or national origin in any program or activity that receives Federal funds or other Federal financial assistance. Programs that receive Federal funds cannot distinguish among individuals on the basis of race, color or national origin, either directly or indirectly, in the types, quantity, quality or timeliness of program services, aids or benefits that they provide or the manner in which they provide them. This prohibition applies to intentional discrimination as well as to procedures, criteria or methods of administration that appear neutral but have a discriminatory effect on individuals because of their race, color, or national origin.

If policies and practices have a potential discriminatory effect a recipient must modify the proposed changes in order to avoid, minimize, or mitigate potential disparate impacts, and then reanalyze the proposed changes in order to determine whether the modifications actually removed the potential disparate impacts. If the recipient chooses not to alter the proposed policy or practice despite the potential disparate impact, they may implement the policy or practice if they can show that it was necessary to achieve a substantial legitimate objective and that there were no alternatives that would have a less disparate impact on minority populations.

Additionally, Persons with limited English proficiency must be afforded a meaningful opportunity to participate in programs that receive Federal funds. Policies and practices may not deny or have the effect of denying persons with limited English proficiency equal access to Federally-funded programs for which such persons qualify. This aspect of Title VI is not evaluated with regard to the placement of program facilities.

Environmental justice was first identified as a national policy in 1994 when President Clinton signed Executive Order 12898 (E.O. 12898), *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*. This order requires that each federal agency shall, to the greatest extent allowed by law, administer and implement its programs, policies, and activities that affect human health or the environment so as to identify and avoid "disproportionately high and adverse" effects on minority and low-income populations. E.O. 12898 thus applies to a wider population than Title VI, which does not cover low-income populations.

A Title VI and Environmental Justice equity evaluation has been completed consistent with the requirements set forth in Executive Order 12890 and 49CFR Section 21.5. One of the primary purposes of a bike share network is to provide first and last mile connectivity for the transit system. As such a bike share system can be considered as a transit amenity and a similar methodology can be used to determine the Title VI and Environmental Justice Impacts. This equity evaluation is based on the analysis of this amenity in the context of the entire system and uses the same thresholds that are applied to other transit amenities.

The basic approach to this analysis is to compare the demographics of the populations within the proposed community areas that would receive bicycle share facilities to the demographics of Los Angeles County. Since the availability of a bike share facility is considered a benefit, then the benefiting population should not be significantly less minority or significantly less poor than the county population. If this is so, then there is a presumption of a Disparate Impact on minorities and/or a Disproportionate Burden on poverty level persons.

### **Data Sources**

Data on the ethnicity and household income levels of the population of Los Angeles County was obtained from the 2010 US Census. Population ethnicity is available at the block group level. The poverty classification of households, and therefore members of those households, was obtained from the 2011-2015 American Community Survey (another US Census data product) and is available at the census tract level.

### **Step By Step Methodology**

A list of the proposed community areas that would receive bicycle share facility locations was obtained and linked to a geographic database containing census data (Table 1). Two separate analyses were performed: (1) the minority and total populations of all block groups within the proposed bicycle share community areas were aggregated with the resulting minority population shares being compared to the minority share of the Los Angeles county population, and (2) the poverty and total populations of all census tracts within the proposed bicycle share community areas were aggregated with the resulting poverty population shares being compared to the poverty share of the Los Angeles county population.

**Bicycle Share Program Phasing as of October 2017**

Service Area City		Square Mi.
<i>Phase 1</i>		
Downtown Los Angeles	Los Angeles	6.2
<i>Phase 2</i>		
Port of LA	Los Angeles	4.6
Venice	Los Angeles	4.7
Central Pasadena	Pasadena	4.1
<i>Phase 3</i>		
Baldwin Park	Baldwin Park	1.2
Claremont	Claremont	1.3
Covina	Covina	1.5
Culver City	Culver City	7.1
Del Rey	Los Angeles	2.4
Duarte	Duarte	1.6
Echo Park	Los Angeles	2.6
El Monte	El Monte	1.3
Glendora	Glendora	3.8
Koreatown	Los Angeles	6.3
La Canada Flintridge	La Canada Flintridge	4.2
La Verne	La Verne	1.3
MacArthur Park – Westlake	Los Angeles	4.1
Marina del Rey	Los Angeles County	2.2
Mar Vista	Mar Vista	2.3
Monrovia	Monrovia	2.1
Monterey Park	Monterey Park	2.6
Palms	Los Angeles	2.5
Playa del Rey	Los Angeles	2.7
Playa Vista	Los Angeles	1.3
Pomona	Pomona	1.8
San Dimas	San Dimas	2.5
Silver Lake	Los Angeles	3.5
South El Monte	South El Monte	1.2
South Pasadena	South Pasadena	1.8
West Covina	West Covina	1.3
University park	Los Angeles	3.8
<i>Phase 4</i>		
Burbank	Burbank	1.8
East Hollywood	Los Angeles	2.9
East Los Angeles	Los Angeles County	1.3
Glendale	Glendale	6.4
Hollywood	Los Angeles	6.6
North Hollywood	Los Angeles	1.5
<i>Phase 5</i>		
Boyle Heights	Los Angeles County	3.5
Downey	Downey	2.0
Huntington Park	Huntington Park	1.6
Inglewood	Inglewood	2.3
Mid-City	Los Angeles	5.4
Whittier	Whittier	1.6
	<b>Total Program Area</b>	<b>126.8</b>

### 3. FINDINGS

The comparison of minority shares of the Los Angeles county population and those within block groups within the proposed bike share community areas is depicted in Table 2.

Similarly, the comparison of poverty shares of the Los Angeles county population and those within

	<b>Total Population</b>	<b>Minority Population</b>	<b>Minority Share</b>
<b>LA County Population</b>	<b>9,411,367</b>	<b>6,657,943</b>	<b>70.7%</b>
<b>Proposed Bicycle Share Community Areas</b>	<b>3,702,499</b>	<b>2,702,228</b>	<b>73.0%</b>

census tracts within the proposed bike share community areas is depicted in Table 3.

The minority population benefitting from the proposed program is an absolute 2.3% greater than the

	<b>Total Population</b>	<b>Minority Population</b>	<b>Minority Share</b>
<b>LA County Population</b>	<b>9,576,850</b>	<b>1,747,429</b>	<b>18.2%</b>
<b>Proposed Bicycle Share Community Areas</b>	<b>4,022,592</b>	<b>723,485</b>	<b>18.0%</b>

minority population of the County, and a relative 3.3% greater than the County. While there is no adopted standard for what constitutes a significant difference for a transit amenity, the absolute 5% difference threshold, and relative 20% difference threshold, applicable to transit service suggests that these differences would result in no Disparate Impact.

The poverty population benefitting from the proposed program is an absolute 0.2% less than the poverty population of the County, and a relative 1.1% less than the County. While there is no adopted standard for what constitutes a significant difference for a transit amenity, the absolute 5% difference threshold, and relative 20% difference threshold, applicable to transit service suggests that these differences would result in no Disproportionate Burden.

## **Fare Equity Analysis**

### EVALUATION OF DISCONTINUED DAY PASS SALES ON BUSES

Federal Transit Administration (FTA) Circular 4702.1B provides guidance for the conduct of equity evaluations of proposed service and fare changes. A transit operator must have a locally adopted process for determining when public hearings, and the equity evaluations associated with such proposals, are required. Impacts to both minority and poverty level persons must be assessed, and there must be locally adopted standards for when differences between impacted persons and everyone else are significant.

Metro's Administrative Code contains these rules and definitions in Section 2-50. A public hearing and equity evaluation is required for any fare change. The difference between the minority/poverty shares of impacted riders and all others is deemed significant if either the absolute difference is 5% or greater, or the relative difference is 35% or more.

#### **Proposal to be Evaluated**

At the present time, Metro riders may purchase a Day Pass online at [taptogo.net](http://taptogo.net), by calling 866.TAPTOGO, at Metro Customer Centers, at TAP vending machines located at Metro rail, Silver Line and Orange Line stations, at El Monte Transit Center, at Patsaouras Bus Plaza, and at over 400 TAP vendor locations. The card costs \$2 except when purchased at a TVM or onboard bus. In the latter two instances, they cost \$1. Because TAP cards may be reused, and have an expected lifetime of ten years, the price difference for the differing sales outlets is considered de minimus.

#### **Title VI Evaluation and Findings**

The most current available ridership data was collected as part of the Spring 2016 Customer Satisfaction Survey. The relevant data provided by this survey includes method of payment, discount category, ethnicity, and poverty status. Day pass users were found to be 91.78% minority compared with 88.24% minorities among all users. This difference does not meet the threshold for a disparate impact using Metro's definitions

#### **Environmental Justice Evaluation and Findings**

The share of Day Pass users below the poverty level is 33.69% compared with 43.75% of all riders. This is a significant difference using Metro's current definitions, but there is no disproportionate burden imposed because the adversely impacted riders are significantly less poor than all riders.

## **Fare Equity Analysis**

### EVALUATION OF ADDING TO TAP CARD STORED VALUE ON BUSES

Federal Transit Administration (FTA) Circular 4702.1B provides guidance for the conduct of equity evaluations of proposed service and fare changes. A transit operator must have a locally adopted process for determining when public hearings, and the equity evaluations associated with such proposals, are required. Impacts to both minority and poverty level persons must be assessed, and there must be locally adopted standards for when differences between impacted persons and everyone else are significant.

Metro's Administrative Code contains these rules and definitions in Section 2-50. A public hearing and equity evaluation is required for any fare change. The difference between the minority/poverty shares of impacted riders and all others is deemed significant if the absolute difference is either 5% or greater, or the relative difference is 35% or more.

### **Proposal to be Evaluated**

At the present time, Metro riders may add Stored Value onto their TAP cards at TAP Vending Machines (TVM's) at Metro rail, Silver Line, El Monte Transit Center, Patsaouras Bus Plaza and Orange Line stations, at Metro Customer Centers, at more than 400 third party sales outlets, online at [taptogo.net](http://taptogo.net) and by calling 866-TAPTOGO. The proposed action would permit patrons the same capability on buses.

### **Title VI Evaluation and Findings**

The most current available ridership data was collected as part of the Spring 2016 Customer Satisfaction Survey. The relevant data provided by this survey includes method of payment, discount category, ethnicity, and poverty status. A comparison of minority representation among TAP Stored Value riders and all riders is provided in **Table 1**.

**Table 1**

	Minority Share	Absolute Diff.	Relative Diff.
TAP Stored Value			
Regular	77.52%	-10.72%	-12.15%
Elderly/Disabled	71.61%	-16.63%	-18.85%
Student (K-12)	89.95%	1.71%	1.94%
All Riders	88.24%		

Current TAP Stored Value users are less minority than all riders (except for Student riders, who represent only 4.63% of Stored Value users). This change confers a benefit on a group that is less minority than all riders and that creates a disparate impact. There is no financial barrier to prevent others users from joining the ranks of Stored Value bus riders, and it is expected this disparate impact will correct itself very quickly due to benefits that are available. There is no other fare structure or media change that could create this benefit and maintain current revenues. In order to proceed with the proposed action the Board of Directors must pass a motion that there is a substantial legitimate justification for the proposed action, and that no other action having a lesser disparate impact would accomplish the objectives of the proposed action.

**Environmental Justice Evaluation and Findings**

An environmental justice evaluation of the proposed action considers the poverty status of impacted riders in comparison with all riders. The poverty representation of the impacted riders compared with all riders is provided in **Table 2**.

	Poverty Share	Absolute Diff.	Relative Diff.
TAP Stored Value			
Regular	63.47%	19.72%	45.07%
Elderly/Disabled	50.50%	6.75%	15.43%
Student (K-12)	23.08%	-20.67%	-47.25%

**All Riders****43.75%**

The poverty representation of all subcategories of TAP Stored Value riders differs significantly from that of all riders. However, since the action is considered beneficial, there is no disproportionate burden.

**Service Equity Analysis****EVALUATION OF DISCONTINUED TOKENS**

Federal Transit Administration (FTA) Circular 4702.1B provides guidance for the conduct of equity evaluations of proposed service and fare changes. A transit operator must have a locally adopted process for determining when public hearings, and the equity evaluations associated with such proposals, are required. Impacts to both minority and poverty level persons must be assessed, and there must be locally adopted standards for when differences between impacted persons and everyone else are significant.

Metro's Administrative Code contains these rules and definitions in Section 2-50. A public hearing and equity evaluation is required for any fare change. The difference between the minority/poverty shares of impacted riders and all others is deemed significant if either absolute difference is 5% or greater, or the relative difference is 35% or more.

**Proposal to be Evaluated**

At the present time, Metro riders may purchase Tokens in packages of 10 for \$17.50. Each token is good for one boarding on Metro and has a value equivalent to the Cash base fare of \$1.75. Tokens are also used as a means of funding transit travel for participants in Metro's Immediate Needs Program with each Token providing one boarding on Metro.

The proposed action would discontinue the availability of Tokens. Patrons who buy tokens would need to obtain or use a TAP card and add Stored Value to the card. TAP cards and the ability to add Stored Value to them are available at the same places where Tokens can be obtained, and are also available through Ticket Vending Machines (TVM's) meaning broader availability. In addition, if a TAP card with Stored Value is used to board Metro, then the patron is entitled to free Metro to Metro transfers for up to two and a half hours from the initial boarding – an added benefit. While the TAP card initially costs \$1 to \$2, depending on where it is purchased, its 10-year expected lifetime (it is reusable) means that the cost of the card is de minimus and not a factor for an equity analysis.

For those who receive Tokens through the Immediate Needs Program, there is a separate action being undertaken to replace that benefit with pre-loaded, stored value TAP cards. Thus, the benefit would be maintained using different media, and the added benefit of free transfers as described above would also be conferred. A separate Title VI evaluation of proposed changes to the Immediate Needs Program (as well as the Rider Relief Program) has been prepared.

## Title VI Evaluation and Findings

The most current available ridership data was collected as part of the Fall 2016 Customer Satisfaction Survey. The relevant data provided by this survey includes method of payment, race, and poverty status. Comparative statistics for Token and TAP users are provided in Table 1.

**Table 1**

	All Users	Token Users	Absolute Diff.	Relative Diff.
Minority Share	91.4%	91.4%	0.0%	0.0%
Poverty Share	60.5%	74.0%	13.5%	22.3%

The minority shares of Token and TAP card users are not significantly different, so the proposed action would not have Disparate Impact on Token users. On the other hand, the share of Token users with poverty level incomes is significantly greater than for TAP card users. This creates a Disproportionate Burden on Token users from the proposed action. This impact is mitigated as the replacement media will have greater availability than Tokens, and also confer a greater benefit when used by virtue of the free Metro to Metro transfers provided.

### Fare Equity Analysis

#### **EVALUATION OF EQUALIZING TAP CARD COSTS**

Federal Transit Administration (FTA) Circular 4702.1B provides guidance for the conduct of equity evaluations of proposed service and fare changes. A transit operator must have a locally adopted process for determining when public hearings, and the equity evaluations associated with such proposals, are required. Impacts to both minority and poverty level persons must be assessed, and there must be locally adopted standards for when differences between impacted persons and everyone else are significant.

Metro's Administrative Code contains these rules and definitions in Section 2-50. A public hearing and equity evaluation is required for any fare change. The difference between the minority/poverty shares of impacted riders and all others is deemed significant if the absolute difference is either 5% or greater, or the relative difference is 35% or more.

#### **Proposal to be Evaluated**

Metro prepaid fare media is stored on reusable TAP cards. Stored Value media may be added to TAP cards for convenient payment of individual fares. Once purchased the TAP card should be retained by the rider as it may be reused continuously for up to 10 years.

At the present time TAP cards may be obtained online at [taptogo.net](http://taptogo.net), by calling 866.TAPTOGO, at Metro Customer Centers, at TAP vending machines located at Metro rail, Silver Line and Orange Line stations, at El Monte Transit Center, at Patsaouras Bus Plaza, and at over 400 TAP

vendor locations and onboard buses (if purchasing a Day Pass). The cards cost \$2 except when purchased at a TVM or onboard a bus. In the latter two instances, they cost \$1.

The proposed action would equalize the cost of a TAP card at \$2 wherever purchased.

### **Evaluation and Findings**

TAP cards are reusable with an expected life of 10 years. At \$2, amortized over 10 years, the cards cost less than 1.7 cents per month. This is considered de minimus and is therefore not subject to a equity analysis.

### **Parking Fees Equity Analysis**

# **Title VI Equity Analysis Parking Fees**

**Prepared: May 31, 2019**

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- 2. Overview**
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## **1. Background**

Los Angeles County Metropolitan Transportation Authority (Metro) is unique among the nation's transportation agencies. It serves as transportation planner and coordinator, designer, builder and operator for one of the country's largest, most populous counties. More than 10.1 million people – nearly one-third of California's residents – live, work, and play within its 1,433-square-mile service area.

### **Metro's Vision Statement**

Metro provides excellence in service and support.

### **Metro's Mission Statement**

Metro is responsible for the continuous improvement of an efficient and effective transportation system for Los Angeles County.

### **Title VI Equity Analysis for Parking Fees**

Metro will be implementing parking fees on the Gold Line at the Arcadia and Duarte stations starting on June 3, 2019. The purpose of the Title VI Equity Analysis is to document the steps Metro has taken and will take to ensure that Metro provides services without excluding or discriminating against individuals on the basis of race, color and national origin. In addition to the Title VI protected categories, Metro will take steps to ensure that our programs and activities do not exclude or discriminate against low-income individuals or other classes protected by Federal or State law.

The analysis below addresses FTA's recommendation for transit agencies evaluate changes, including parking fees at the planning stages to determine whether the proposed changes have a potential discriminatory impact on Title VI populations.

FTA also recommends that transit providers evaluate the effects on low income populations in addition to Title VI protected populations. Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

This analysis considers the Metro Board adopted Title VI policies and thresholds for determining Disparate Impact and Disproportionate Burden for fare changes. These thresholds can be found in Metro's Administrative Code Section 2-50.

Disparate Impact is when a facially neutral policy or practice disproportionately affects members of a group identified by race, color, or national origin. The FTA defines a minority person as anyone who is American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, or Native Hawaiian or other Pacific Islander.

Metro's Disparate impact policy: a disparate adverse impact will be deemed to have occurred if the absolute difference between the percentage of minorities adversely affected and the overall percentage of minorities is **5% or greater**, or if the relative difference is 20% or more between the percentages of these two groups.

Disproportionate Burden is when a neutral policy or practice disproportionately affects low income communities more than non-low income communities.

Metro's Disproportionate Burden Policy: a disproportionate burden will be deemed to exist if the absolute difference between the percentages of low income adversely affected by the service change and the overall percentage of low income persons is 5% or greater, or if there is a 20% or greater percent difference between the percentages of these two groups.

If a disparate impact is found, the proposed action may only be implemented if: (1) there is a substantial legitimate justification for the proposed change, and (2) there are no alternatives that would have a less disparate impact on minority populations and still accomplish the project goals.

If a disproportionate burden is found, measures to avoid, minimize or mitigate should be taken into account.

The evaluation presented herein assesses whether there are disparate impacts on minority populations and/or disproportionate burdens on low income populations arising from the proposed parking fee implementation.

## **2. OVERVIEW**

Metro currently owns, leases, operates and/or manages parking facilities at 59 stations and has an inventory of approximately 25,000 parking spaces along the Metro system service area. With the expansion of the transit system and increased ridership, the demand for Metro parking resources has also increased. Metro's Parking Management Program (Program) effectively manages parking through a pricing policy and transit ridership verification. Prior to 2016, Metro's parking facilities would fill to capacity early in the morning leaving transit users without a parking option at major stations. Since

2016, the Program has been implemented at 19 Metro stations with heavily utilized parking facilities. The implementation of the Program has made parking available throughout the day when the facilities used to fill to capacity early in the morning. The Program is part of a broader set of efforts to implement best practices in parking demand management and ensure equitable treatment for Metro's transit riders. To pay for parking, users must use their transit media TAP card which must be associated with the parked vehicle. The map below shows the stations with paid and free parking.

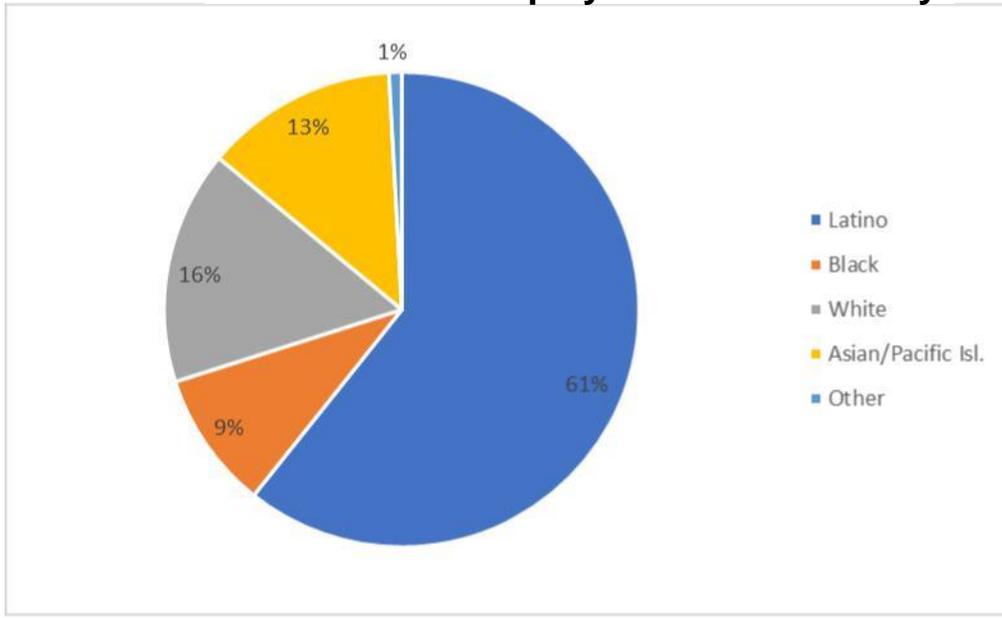
# Metro Parking Program Map



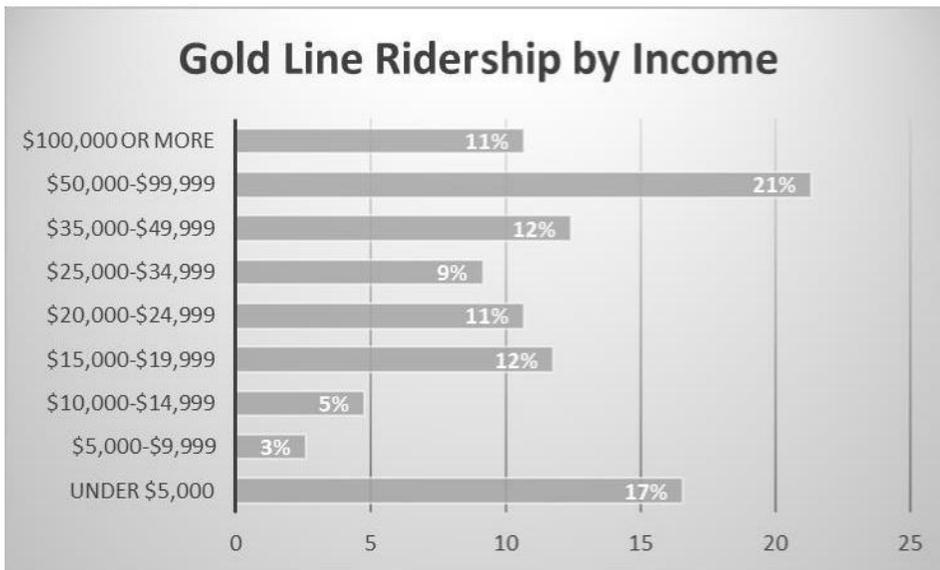
### 3. DEMOGRAPHICS

The parking lots that are going to implement parking fees are located among the Gold Line which is 83% minority and 69% low-income (making less than \$50,000).

#### Gold Line Ridership by Race and Ethnicity



#### Gold Line Ridership by Income



#### 4. DATA SOURCES

The proposed changes have been evaluated using ridership data from the Metro Gold Line, the impacted rail line. Data was obtained using ridership surveys conducted in the Spring of 2019.

Each of the impacted station's share of minority and low-income population shares is compared with the corresponding Metro service area shares to determine whether or not a disparate impact (minority), or disproportionate burden (low-income populations), would result.

#### 5. Analysis

	<b>Total Ridership of Service Area</b>	<b>Percent Minority Ridership</b>	<b>Absolute Difference</b>	<b>Relative Difference</b>
<b>Service Area</b>		80%	-	-
<b>Gold Line</b>		83%	3%	3.75%

	<b>Total Ridership of Service Area</b>	<b>Low Income Percent Ridership</b>	<b>Absolute Difference</b>	<b>Relative Difference</b>
<b>Service Area</b>		64%	-	-
<b>Gold Line</b>		69%	5%	7.8%

Metro's Disparate impact policy: a disparate adverse impact will be deemed to have occurred if the absolute difference between the percentage of minorities adversely affected and the overall percentage of minorities is **5% or greater**, or if the relative difference is 20% or more between the percentages of these two groups.

Metro's Disproportionate Burden Policy: a disproportionate burden will be deemed to exist if the absolute difference between the percentages of low income adversely affected by the service change and the overall percentage of low income persons is 5% or greater, or if there is a 20% or greater percent difference between the percentages of these two groups.

**Findings:**

The demographic data associated with the impacted riders shows that the impact to minority riders is 3% which is less than the 5% absolute difference disparate impact policy threshold. The relative difference is 3.75% which is also less than the adopted policy threshold. The difference between the overall low-income riders and the Gold line low-income riders absolute difference is 5% which is not greater than the absolute difference or the relative difference (7.8%) outlined in the disproportionate impact policy threshold.

Using Metro's current definitions, there is a potential disproportionate burden imposed because the adversely impacted riders are more low-income (69%) than the overall low income ridership (64%). Mitigation can be taken to address the requirement to avoid, minimize or mitigate as the parking fees are implemented. A possible mitigation is to provide a discount on the tap card of low income registered tap card users. This data is captured when riders sign up for the discount program.

**6. CONCLUSION**

The implementation of parking fees at Metro parking structures has no impact to Title VI protected groups and Metro's Administrative Code.

## 7. Appendix (outreach materials)

### Looking for no-cost parking near Arcadia and Duarte/City of Hope

There is free parking at Metro Gold Line Sierra Madre Villa Station.

Metro Gold Line Sierra Madre Villa Station 149 N Halstead St, Pasadena, CA 91107

**FREE ON-SITE PARKING**  
ESTACIONAMIENTO GRATUITO EN EL SITIO

**BIKE RACKS**  
PORTABICICLETAS

metro.net/parking

### Estacionamiento de pago Ilega pronto.

La tarifa de \$3 para el estacionamiento diario empezara el 3 de junio.

Para ayudar a mantener el estacionamiento para los usuarios de Metro, los aparcamientos de la estacion Arcadia y Duarte/City of Hope haran la transicion a estacionamiento de pago el lunes, 3 de junio de 2019.

La tarifa de estacionamiento diario sera de \$3 para los usuarios de transit° que viajen con una tarjeta TAP valida.

Opciones de pago:

- > Kiosco in situ
- > Descargue la aplicacion MetroParking en Google Play o Apple App Store y use la Zona 309 para la estacion Arcadia y la Zona 312 para estacion Duarte/City of Hope

Para mas informacion, visite [metro.net/parking](http://metro.net/parking).



Metro

Board Report

Los Angeles County  
Metropolitan Transportation  
Authority  
One Gateway Plaza  
3rd Floor Board Room  
Los Angeles, CA

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File #: 2017-0916, File Type: Program

Agenda Number: 8.

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PLANNING AND PROGRAMMING COMMITTEE  
MARCH 14, 2018

**SUBJECT: METRO BIKE SHARE EXPANSION ENVIRONMENTAL  
AND TITLE VI ANALYSES**

**ACTION: APPROVE RECOMMENDATIONS FOR METRO BIKE SHARE EXPANSION**

**RECOMMENDATION**

CONSIDER:

- A. ADOPTING the Metro Bike Share Phase III through V Expansion Environmental Analysis findings that the expansion qualifies for a Categorical Exemption under Section 15303 (Class 3), New Construction or Conversion of Small Structures (Attachment A);
- B. AUTHORIZING staff to file the Notice of Exemption for the Phase III through V Expansion;
- C. ADOPTING the Phase III through V Expansion Title VI and Environmental Justice Analysis findings that there is no Disparate Impact and no Disproportionate Burden associated with the expansion (Attachment B); and
- D. AUTHORIZING the CEO to negotiate and execute an amendment to the Memorandum of Understanding (MOU) between the City of Los Angeles and Metro to expand the Metro Bike Share service area with reallocated equipment within these Environmentally, Title VI, and Environmental Justice cleared areas.

**ISSUE**

An Environmental Analysis and Title VI and Environmental Justice Analysis have been completed for the Metro Bike Share Phase III through V Expansion ("Project"). In order to proceed, staff requests Board adoption of the analysis findings, authorization to file the Notice of Exemption, and authorization to amend the MOU with the City of Los Angeles.

**DISCUSSION**

**Background**

At the January 2014 meeting, the Board Motion 58 authorized the CEO to procure, contract, and



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Board Report

Los Angeles County  
Metropolitan Transportation  
Authority  
One Gateway Plaza  
3rd Floor Board Room  
Los Angeles, CA

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File #: 2017-0880, File Type: Motion / Motion Response

Agenda Number:

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FINANCE, BUDGET AND AUDIT COMMITTEE  
FEBRUARY 14, 2018

**SUBJECT: TRANSFER ON 2<sup>ND</sup> BOARDING CUSTOMER READINESS EFFORTS**

**ACTION: APPROVE RECOMMENDATION**

**RECOMMENDATION**

AUTHORIZE the Chief Executive Officer to:

- A. REPLACE Day Pass sales onboard bus with ability to purchase Stored Value and Metro base fare onboard bus;
- B. ELIMINATE tokens and transition to TAP; and
- C. IMPLEMENT a consistent \$2 fee for TAP cards system-wide.

**ISSUE**

Onboard bus TAP Day Pass purchases have declined by over 85% since October, 2011. In comparison, Stored Value fare payments are growing and are expected to increase significantly once Transfer on 2<sup>nd</sup> Boarding is implemented. With approval, onboard Day Pass sales will be replaced onboard the bus with the ability to purchase or reload TAP cards with either Stored Value or base fare at the farebox. This change will align internal efforts with customer demand and make it easier for customers to purchase fare and travel throughout LA County. Day Pass sales will continue to be available online at [taptogo.net](http://taptogo.net), by calling 866.TAPTOGO, at Metro Customer Centers, at TAP vending machines located at all Metro rail and Orange Line stations, and at over 400 TAP vendor locations.

The popularity and added security of TAP cards and the elimination of the discounted fare for Metro tokens has caused tokens to become obsolete. At one time, a token was good for one ride at a discounted rate but now a token is worth the same as the regular base fare of \$1.75. Transitioning token customers to TAP will provide customers with faster and safer boardings. Customers will no longer have to search for tokens but will quickly touch their TAP cards to the farebox to board.

## 14. Board Approval of Systemwide Service Standards



Metro

Board Report

Los Angeles County  
Metropolitan Transportation  
Authority  
One Gateway Plaza  
3rd Floor Board Room  
Los Angeles, CA

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File #: 2019-0643, File Type: Policy

Agenda Number: 39.

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EXECUTIVE MANAGEMENT COMMITTEE  
SEPTEMBER 19, 2019

**SUBJECT: SERVICE STANDARDS POLICIES FOR TITLE VI PROGRAM UPDATE**

**ACTION: ADOPT UPDATED POLICY**

**RECOMMENDATION**

ADOPT Service Standards Policies for Title VI Program Update presented in Attachment A.

**ISSUE**

Title VI of the Civil Rights Act of 1964 (Title VI) prohibits discrimination on the basis of race, color, and national origin in programs that receive federal funding. The Federal Transportation Administration (FTA) requires transportation agencies to demonstrate their compliance with Title VI by adopting policies in compliance with FTA Circular 4702.1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," issued October 1, 2012. FTA requires the Metro Board of Directors to review and approve the Metro Service Standards and policies to be included in the Title VI Program Update due every three years.

**BACKGROUND**

Section 601 of Title VI of the Civil Rights Act of 1964 (Title VI) states the following:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

FTA Circular 4702.1B, revised in 2012, requires transportation agencies to develop systemwide service standards and include them in the Title VI Program update due every three years. These service standards should be followed for the three-year period until the next program update.

**DISCUSSION**

Findings

In 2013 and 2016, the Metro Board of Directors adopted systemwide standards as required by the FTA Title VI circular. These included; Passenger Loading, Headways, On-Time Performance, Stop

Spacing, Accessibility, Passenger Amenities as well as Vehicle Assignment. These standards and policies establish thresholds for performance by mode for Metro Operations. Additionally, these systemwide standards are monitored and results are reported every three years to assist in determining if the systemwide standards are meeting Metro's performance goals.

### Considerations

Establishing systemwide standards assist agencies in running day-to-day operations. Metro's Service Development, Scheduling & Analysis department has monitored the previously adopted service standards and is recommending some minor adjustments to follow for the next three years as Metro considers potential system-wide service adjustments. The adjustments are outlined in Attachment A and include:

### **DETERMINATION OF SAFETY IMPACT**

The requested action in this report will have no direct impact on the safety of Metro's employees or customers.

### **FINANCIAL IMPACT**

Adoption of the Service Standards Policies has no direct impact upon Metro's expenditures or revenues. Approval is consistent with the implementation of service included in the adopted FY2020 Budget.

### **IMPLEMENTATION OF STRATEGIC PLAN GOALS**

Recommendation supports strategic plan goal # 5, "Provide responsive, accountable, and trustworthy governance within the Metro organization" by adhering to civil rights requirements mandated by Title VI of the Civil Rights Act of 1964.

### **ALTERNATIVES CONSIDERED**

The alternative to not including Board approved Service Standards Policies could have significant negative impacts to the agency. Failure to include Board approved Service Standards policies in the Title VI Program update may result in FTA not concurring Metro's Title VI Program Update which may result in suspension of federal grants by being non-compliant with a civil rights requirements.

### **NEXT STEPS**

The approval of the recommended adjustments to the service standards will become effective immediately and will be part of Metro's Title VI Program Update. The Title VI Program Update is scheduled for Board approval at the October 24, 2019 Board of Directors meeting. Upon Board approval, Metro's Title VI Program Update will be submitted to FTA by the due date of November 1, 2019.

### **ATTACHMENTS**

Attachment A - Metro Service Standards

Prepared by: Aida Berry, Senior Manager, Civil Rights Programs (Title VI),  
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Conan Cheung, Senior Executive Officer, Service Development, Scheduling &  
Analysis (213) 418-3034

Reviewed by: Jonaura Wisdom, Chief of Civil Rights Programs, (213) 418-3168



Phillip A. Washington  
Chief Executive Officer



Los Angeles County  
Metropolitan Transportation Authority

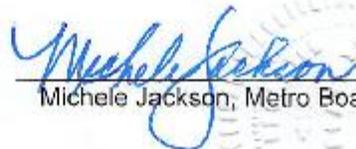
**Metro**

**CERTIFICATION**

The undersigned, duly qualified and acting as Board Secretary of the Los Angeles County Metropolitan Transportation Authority, certifies that the following was approved, by majority vote of all members of the Board of Directors, at a regular meeting of the Los Angeles County Metropolitan Transportation Authority held on September 26, 2019.

**39. SUBJECT: SERVICE STANDARDS POLICIES FOR                      2019-0643  
TITLE VI PROGRAM UPDATE**

ADOPTED ON CONSENT CALENDAR Service Standards Policies for Title VI Program Update presented in Attachment A.

  
\_\_\_\_\_  
Michele Jackson, Metro Board Secretary

DATED: September 30, 2019

**2019 METRO SYSTEMWIDE OPERATING STANDARDS**

**Passenger Loading**

Proposed passenger loading standards are summarized in Table A-1. The standard expresses the maximum average ratio of passengers to seats *by direction* for a one-hour period by time of day *and should not be exceeded for at least 95% of all hourly periods*.

---

	Peak Passengers/seat	Off-Peak Passengers/seat
Heavy Rail	2.30	2.30
Light Rail	1.75	1.75
BRT	1.30	1.30
Rapid	1.30	1.30
Express	1.30	1.30
All Other Bus	1.30	1.30

---

Table A-1  
Passenger Loading Standards

**Headways**

Current headway standards are summarized in Table A-2. The headway standards provide for the maximum scheduled gap (in minutes) between trips *in the peak direction of travel* at the maximum load point of a line by time of day *and should not be exceeded for at least 90% of all hourly periods*.

---

	Peak	Off-Peak
Heavy Rail	10	20
Light Rail	12	20
BRT	12	30
Rapid	20	30
Express	60	60
Limited	30	60
All Other Bus	60	60

---

Table A-2  
Headway Standards

**On-Time Performance**

On-time performance standards are based on the Board adopted fiscal year budget target for bus, light rail and heavy rail. The standards provide for the minimum desired percentage of time point departures that are between one minute early and five minutes late (excluding terminal departures). *This standard is to be revised to establish that 90% of lines achieve at least 90% of the adopted budget target for the fiscal year.*

**Stop Spacing**

Proposed stop spacing standards are shown in Table A-3. The standards provide for the average stop spacing in miles by type of service *and spacing should fall within 0.1 mile of the specified average at least 90% of the time.*

---

Heavy Rail	1.50
Light Rail	1.50
BRT	1.25
Rapid	0.75
Express	1.25
All Other Bus	0.30

---

Table A-3  
Average Stop Spacing Standards (in miles)

**Accessibility**

The current accessibility standard is shown in Figure A-1. The standard ensures the availability of fixed **route service to virtually all residents of Metro's service area while** limiting duplication of service by using services operated by others to achieve the standard.

*Service is to be provided within  $\frac{1}{4}$  mile of 99% of Census tracts within Metro's service area having at least 3 households per acre and/or at least 4 jobs per acre. Fixed route service provided by other operators may be used to meet this standard.*

Figure A-1  
Accessibility Standard

**Passenger Amenities Policy**

The current passenger amenities policy is shown in Figure A-2. The standard applies to all off-street facilities owned by Metro that permit passenger boardings.

Shelters:	HR – not applicable LR – at least 80 linear ft. Bus – at least 6 linear ft. per bay
Seating:	HR – at least 12 seats LR – at least 10 seats Bus – at least 3 seats per bay
Info Displays:	HR – at least 12 LR – at least 10 Bus – at least 3
LED Displays:	HR – at least 8 arrival/departure screens LR – not applicable Bus – not applicable
TVMs:	HR/LR = at least 2 Bus – not applicable
Elevators:	HR – at least 2 LR – at least 1 for elevated/underground Bus – at least 1 for multi-level terminals
Escalators:	HR – at least 4 (2 Up / 2 Down) LR – not applicable Bus – not applicable
Waste Receptacles:	HR – at least 6 LR – at least 2 Bus – at least 1 per 3 bays / 2 minimum

Figure A-2  
Passenger Amenities Policy

## ATTACHMENT A- SYSTEMWIDE SERVICE STANDARDS

### Vehicle Assignment Policy

The current vehicle assignment policy is shown in Figure A-3.

Heavy Rail:	Not applicable – only one line and one vehicle type
Light Rail:	Vehicles will be assigned to individual lines on the basis of compatibility of vehicle controllers with each line's signal system. The number of vehicle types/manufacturers will be kept to no more than two at any facility to minimize parts storage and maximize maintenance expertise.
Bus:	Vehicles will be assigned to individual facilities on the basis of vehicle size requirements for lines supported by each facility.

Figure A-3  
Vehicle Assignment Policy

## 15. Board Approval of Service Monitoring Results



Metro

Board Report

Los Angeles County  
Metropolitan Transportation  
Authority  
One Gateway Plaza  
3rd Floor Board Room  
Los Angeles, CA

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File #: 2019-0644, File Type: Program

Agenda Number: 42.

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EXECUTIVE MANAGEMENT COMMITTEE  
SEPTEMBER 19, 2019

**SUBJECT: SERVICE MONITORING RESULTS FOR TITLE VI PROGRAM UPDATE**

**ACTION: APPROVE RECOMMENDATION**

**RECOMMENDATION**

ADOPT Service Monitoring Results for Title VI Program Update presented in Attachment A.

**ISSUE**

Title VI of the Civil Rights Act of 1964 (Title VI) prohibits discrimination on the basis of race, color, and national origin in programs that receive federal funding. The Federal Transportation Administration (FTA) requires transportation agencies to demonstrate their compliance with Title VI by ensuring compliance with FTA Circular 4702.1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," issued October 1, 2012. FTA requires the Metro Board of Directors to review and approve the Metro Service Monitoring Results to be included in the Title VI Program Update due every three years.

**BACKGROUND**

Section 601 of Title VI of the Civil Rights Act of 1964 (Title VI) states the following:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

FTA Circular 4702.1B, revised in 2012, requires transportation agencies to develop systemwide service standards and monitor the implementation of these standards. The service monitoring results are required to be part of the Title VI Program update due every three years. The Service Monitoring Results assist agencies when updating service standards for the next program update due in three years.

**DISCUSSION**

Findings

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The main focus of service monitoring is to assess the systemwide standards are being met. The Monitoring Results is an evaluation of compliance with the adopted service standards and policies. The evaluation findings are outlined in Attachment A.

Considerations

Based on the Monitoring Results, a minor adjustment to the systemwide standards is being proposed and it is being presented as a separate item as it required separate Board approval.

**DETERMINATION OF SAFETY IMPACT**

The requested action in this report will have no direct impact on the safety of Metro's employees or customers.

**FINANCIAL IMPACT**

Adoption of the Service Monitoring Results has no direct impact upon Metro's expenditures or revenues. Approval is consistent with the implementation of service included in the adopted FY2020 Budget.

**IMPLEMENTATION OF STRATEGIC PLAN GOALS**

Recommendation supports strategic plan goal # 5, "Provide responsive, accountable, and trustworthy governance within the Metro organization" by adhering to civil rights requirements mandated by Title VI of the Civil Rights Act of 1964.

**ALTERNATIVES CONSIDERED**

The alternative to not including Board approved Service Monitoring Results could have significant negative impacts to the agency. Failure to include Board approved Service Monitoring Results in the Title VI Program update may result in FTA not concurring Metro's Title VI Program Update which may result in suspension of federal grants by being non-compliant with a civil rights requirements.

**NEXT STEPS**

The Title VI Program Update will be scheduled for Board approval at the October 24, 2019 Board of Directors meeting. Upon Board approval, Metro's Title VI Program Update will be submitted to FTA by the due date of November 1, 2019.

**ATTACHMENTS**

Attachment A - Metro Service Monitoring Results

Prepared by:                   Aida Berry, Senior Manager, Civil Rights Programs (Title VI),  
   (213) 922-2748  
   Conan Cheung, Senior Executive Officer, Service Development, Scheduling &

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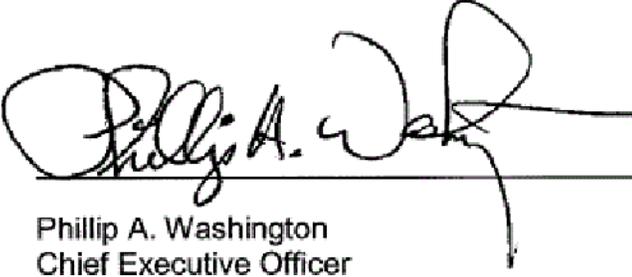
**File #:** 2019-0644, **File Type:** Program

**Agenda Number:** 42.

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Analysis (213) 418-3034

Reviewed by: Jonaura Wisdom, Chief of Civil Rights Programs, (213) 418-3168



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Phillip A. Washington  
Chief Executive Officer



Los Angeles County  
Metropolitan Transportation Authority

**Metro**

**CERTIFICATION**

The undersigned, duly qualified and acting as Board Secretary of the Los Angeles County Metropolitan Transportation Authority, certifies that the following was approved, by majority vote of all members of the Board of Directors, at a regular meeting of the Los Angeles County Metropolitan Transportation Authority held on September 26, 2019.

**42. SUBJECT: SERVICE MONITORING RESULTS FOR                    2019-0644  
TITLE VI PROGRAM UPDATE**

ADOPTED ON CONSENT CALENDAR Service Monitoring Results for Title VI Program Update presented in Attachment A.

  
Michele Jackson, Metro Board Secretary



DATED: September 30, 2019

## Attachment

### **Service Monitoring Results: 2019 Review of Service Policies and Standards for FY2017 – FY2019**

As required by Federal Transit Administration (FTA) Circular 4702.1B (Chapter IV-9, Section 6) agencies must monitor service, at least once every three years, and present the results to the Board of Directors for approval. This is a review of Metro's compliance with specified service standards and policies under the requirement. The review covers the past three years from the last Title VI Program Update.

The following topics are addressed:

1. Service Availability
2. Classification of Services
3. Headway Standards
4. Loading Standards
5. On-Time Performance Standards
6. Passenger Amenities Standards
7. Vehicle Assignment Standards

All reviews assess whether Metro has complied with its policies and standards, and whether any non-compliance is biased toward minorities (disparate impact) or persons in Low-Income (disproportionate burden).

#### **1. Service Availability**

The adopted service availability standard is:

At least 99% of all Census tracts within Metro's service area having at least 3 HH/acre and/or 4 jobs/acre shall be within one quarter mile of fixed route service (a bus stop or rail station).

Fixed route service provided by other operators may be used to meet this standard. The use of other operator services to meet this standard ensures maximum availability without unnecessary duplication of service.

**Results:** There are 1,892 tracts within Metro's service area that meet the above thresholds of 3 HH/acre and/or 4 jobs/acre. Only 10 of these tracts are not within one-quarter mile of fixed route service. This is a service availability of 99.47%.

#### Service Area Demographics - Minorities

	Service Area	Tracts Not Served
Population	9,665,120	40,140
Minority Population	6,669,203	26,354
Minority Share	69.00%	65.66%

#### Service Area Demographics – Low-Income

	Service Area	Tracts Not Served
Population	9,813,599	39,494
Low-Income Population	1,647,760	5,093
Low-Income Share	16.79%	12.90%

**Results:** Both the minority share, and low-income share of the unserved tracts are less than the service area minority and Low-Income shares. Therefore, there is no disparate impact or disproportionate burden created by the unserved areas.

## 2. Classification of Services

The review of service policies and standards requires determination of Minority routes (and Low-Income routes) so that a comparison of compliance between Minority (or Low-Income) routes and all routes may be made. If the share of Minority routes meeting a standard is an absolute 5% or more less than the share of all routes meeting a standard, then a disparate impact on Minority routes has occurred. If the share of Low-Income routes meeting a standard is an absolute 5% or more less than the share of all routes meeting a standard, then a disproportionate burden on Low-Income routes has occurred.

FTA has defined a Minority route as having one-third or more of its revenue miles operated in census areas that exceed the service area minority share of population. By extension, a Low-Income route will have one-third or more of its revenue miles operated in census areas that exceed the service area low-income share of population.

**Results:** There are 141 fixed route bus lines operated by Metro. It was determined that 108 of these are Minority lines (76.60%), and 115 of these are Low-Income lines (81.56%). Both Heavy Rail lines are Minority and Low-Income lines. All four Light Rail lines are Minority lines and Low-Income lines.

These definitions were used to stratify compliance levels in the subsequent evaluations.

## 3. Headway Standards

Current service standards were last adopted in FY16. The adopted headway standards follow:

Rail Headway Standards

Mode	Peak Max. ( in min)	Off-Peak Max (in min)
Heavy Rail	10	20
Light Rail	12	20

Not to be exceeded for at least 90% of all hourly periods

Bus Headway Standards

Service Type	Peak Max. ( in min)	Off-Peak Max (in min)
Local	60	60
Limited	30	60
Express	60	60
Shuttle	60	60
Rapid	20	30
BRT	12	30

Not to be exceeded for at least 90% of all hourly periods

**Results:** Compliance determination used service in effect as of June 23, 2019 which is the most recent service change program. All rail lines were in full compliance with the adopted standards for weekdays, Saturdays, Sundays and Holidays.

Weekday Headway Compliance - # of Bus Lines

	All Lines	Minority Lines Only	Low- Income Lines Only	All Compliance	Minority Compliance	Low- Income

						Compliance
Meets Standard	101	81	87	72.1%	75.7%	76.3%
Exceeds Standard	39	26	27			

**Saturday Headway Compliance - # of Bus Lines**

	All Lines	Minority Lines Only	Low-Income Lines Only	All Compliance	Minority Compliance	Low-Income Compliance
Meets Standard	78	60	66	70.9%	76.6%	77.6%
Exceeds Standard	32	22	24			

**Sunday & Holiday Compliance - # of Bus Lines**

	All Lines	Minority Lines Only	Low-Income Lines Only	All Compliance	Minority Compliance	Low-Income Compliance
Meets Standard	76	59	66	73.1%	75.7%	76.3%
Exceeds Standard	28	18	19			

**Results:** Minority and Low-Income bus lines exhibited higher rates of compliance with the headway standards than all lines together. Certain patterns of non-compliance were evident. Late evening and weekend services were most likely to exceed the base service standards. As service has been scheduled to demand, services with hourly or near hourly headways to begin with are now operating at wider than 60-minute headways. Rapid bus lines were frequently in non-compliance because the 30-minute base headway is a policy standard while those services have increasingly been scheduled to demand.

A systemwide restructuring study is nearing completion and is expected to change headway standards, and to significantly improve compliance.

**4. Loading Standards**

Current service standards were adopted in FY16. The adopted passenger loading standards follow:

**Rail Passenger Loading Standards**

Mode	Peak Passengers/Seat	Off-Peak Passengers/Seat
Heavy Rail	2.30	1.60
Light Rail	1.75	1.25

Not to be exceeded for at least 95% of all hourly periods

**Bus Passenger Loading Standards**

Service Frequency (in min)	Peak Passengers/Seat	Off-Peak Passengers/Seat
1-10	1.40	1.30

11-20	1.30	1.25
21-40	1.20	1.10
41-60	1.10	1.00
60+	1.00	0.75

Not to be exceeded for at least 95% of all hourly periods

Although a headway of greater than 60 minutes would be an exception to the headway standards a loading standard is provided for such services when they occur.

The rail system is only beginning to receive Automated Passenger Counters (APC's), and they are still being calibrated. Load monitoring can only be done on a sampling basis. Checkers ride randomly selected cars on randomly selected trips recording data for Ons and Offs by station. Over a six-month sliding time frame this data is aggregated to build a profile of rail ridership, and is the primary source for ridership estimation by day type and line. While only one car is monitored on any given sample trip, whether or not that car meets the loading standard is a surrogate for whether trains are meeting the standard. Loading on the bus system is monitored every six months using quarterly APC data for max loads at time points. Since the most recent bus load standard evaluation was performed using January through March 2019 data, the samples collected from rail ride checks were compiled for the same three months.

Each rail ride check record was processed using Line # (determines mode and applicable # of seats), day type, trip start time (used to categorize weekday trips as peak or off peak), and max accumulated load (calculated from the observations in each check). A rail mode is assumed to comply with the loading standards if 95% of all monitored trips conform to the standards. Data is from the period January through March 2019 which is the same time frame used for bus monitoring.

#### Weekday Rail Load Standard Monitoring

	Peak			Base		
	# of Checks	Within Standard	% Compliance	# of Checks	Within Standard	% Compliance
Heavy Rail	1,454	42	97.1%	2,447	54	97.8%
Light Rail	1,024	29	97.2%	1,750	27	98.5%

#### Weekend Rail Load Standard Monitoring

	Saturday			Sundays & Holidays		
	# of Checks	Within Standard	% Compliance	# of Checks	Within Standard	% Compliance
Heavy Rail	670	6	99.1%	606	3	99.5%
Light Rail	646	18	97.1%	635	4	99.4%

**Results:** Both modes met the standard at least 95% of the time, and each line was in compliance at all times, as well.

Bus monitoring is more extensive as all buses are equipped with APC's, and data is available for all time points along each bus route for observed max loads by trip. Every six months the most recent quarterly data is evaluated to determine adherence with the adopted standards. The most recent evaluation used January through March 2019 data.

#### Bus Load Standard Monitoring

Day Type	# of Lines	Directional Hours Monitored	Exceptions
----------	------------	-----------------------------	------------

Weekdays	140	5,315	
Saturdays	110	4,315	1
Sundays/Holidays	104	4,058	1

**Results:** Line 16 Eastbound exceeded the standards between Midnight and 1am on Saturdays, and Line 53 Northbound exceeded the standards between 7am and 8am on Sundays. As only one directional hour exceeded the loading standard in each instance over 97% of the hours operated on each line on those days conformed to the standards. Therefore, all bus lines in the system were found to be in conformance with the adopted loading standards.

## 5. On-Time Performance Standards

The current on-time performance standards for the system define on-time as no more than one minute early or five minutes late when leaving a time point. In the currently adopted standard both rail and bus have the same objective: 80% on-time on at least 90% of lines at least 90% of the time.

Rail is currently monitored using NextTrain. Since bus is evaluated every six months using quarterly data this evaluation was performed on the same basis. Data for the months of January through March 2019 was compiled.

Weekday Rail On-Time Performance

Mode	# of Time Point Observations	# of On-Time Observations	On-Time Percentage
Heavy Rail	85,400	76,825	90.0%
Light Rail	353,029	259,004	73.4%

Saturday Rail On-Time Performance

Mode	# of Time Point Observations	# of On-Time Observations	On-Time Percentage
Heavy Rail	22,028	18,931	85.9%
Light Rail	72,256	54,084	74.9%

Sundays & Holidays Rail On-Time Performance

Mode	# of Time Point Observations	# of On-Time Observations	On-Time Percentage
Heavy Rail	46,270	41,999	90.8%
Light Rail	146,974	111,970	76.2%

**Results:** Heavy Rail consistently exceeds the 80% on-time objective largely because it operates entirely in a grade separated environment. Light Rail, except for the Green Line (which was 84.2% on-time on weekdays), operates with significant portions at grade. Even on weekends with somewhat lesser traffic conflicts light rail falls short of the 80% objective. Since all rail lines were classified as Minority lines and Low-Income lines there is no disparate impact or disproportionate burden resulting from this finding.

On the bus side we also see on-time performance consistently short of the 80% objective. The following observations are based upon three months of data from January through March 2019.

Bus Weekday On-Time Performance

	All Lines	Minority Lines	Low-Income Lines
Avg On-Time %	72.62%	72.02%	72.20%

Lines Meeting Std	25	18	18
Lines Failing Std	112	85	93
% Meeting Std	18.25%	17.48%	16.22%

#### Bus Saturday On-Time Performance

	All Lines	Minority Lines	Low-Income Lines
Avg On-Time %	73.65%	73.12%	73.21%
Lines Meeting Std	21	11	12
Lines Failing Std	86	67	75
% Meeting Std	19.63%	14.10%	13.79%

#### Bus Sunday & Holiday On-Time Performance

	All Lines	Minority Lines	Low-Income Lines
Avg On-Time %	78.90%	78.62%	79.01%
Lines Meeting Std	46	30	35
Lines Failing Std	55	43	47
% Meeting Std	45.54%	41.10%	42.68%

**Results:** On any given day, non-Minority, non-Low-Income, Minority, and Low-Income bus lines exhibit similar on-time percentages. On Sundays and Holidays the average on-time percentage approaches the 80% objective. Except for Saturdays, the on-time share of Minority and Low-Income bus lines is within 5% of the share of all bus lines meeting the standard. On Saturdays we observe both a disparate impact on minority bus line users, and a disproportionate burden on Low-Income bus line users. The Saturday share of bus lines meeting the standard in each of these categories is more than 5% less than the overall compliance share. Of the lines meeting the on-time standard on Saturdays that are not Minority or Low-Income, most operate in uncongested traffic corridors and about half of them are in the San Fernando Valley.

Metro has been undertaking a detailed evaluation of its entire bus system (termed NEXGEN) for the past two years with the objective of completely redefining routes and operating standards. As a part of this effort the most congested bus corridors (where bus speeds are most severely impacted) have been subjected to detailed field work and evaluation in order to identify traffic improvements such as bus-only lanes, queue jumps, stop relocation, etc. that would significantly improve bus speed, and reliability. A preliminary program of projects has been developed for the studied corridors. Metro will be working with the affected communities to agree on an implementation program and identify funding for its completion. The majority of the studied corridors are served by Minority and Low-Income bus lines.

## 6. Passenger Amenities Standards

A set of passenger amenities standards were incorporated in the FY16 update of Metro's Service Policies. Those standards are presented here.

#### Heavy Rail Passenger Amenities Standards

Amenity	Allocation
Seating	At least 12 seats
Info Displays	At least 12
LED Displays	At least 8 Arrival/Departure screens

TVM's	At least 2
Elevators	At least 2
Escalators	At least 4 (2 Up / 2 Down)
Trash Receptacles	At least 6

Applies to each station

#### Light Rail Passenger Amenities Standards

Amenity	Allocation
Shelters	At least 80 linear feet per bay
Seating	At least 10 seats
Info Displays	At least 10
TVM's	At least 2
Elevators	At least 1 for elevated / underground
Trash Receptacles	At least 2

Applies to each station

#### Bus Passenger Amenities Standards

Amenity	Allocation
Shelters	At least 6 linear feet per bay
Seating	At least 3 seats per bay
Info Displays	At least 3
Elevators	At least 1 for multi-level terminals
Trash Receptacles	At least 1 per 3 bays / 2 minimum

Applies to off-street bus facilities serving 4 or more bus lines

There are no standards for bus stops because apart from painting the curb Red and erecting bus stop signage, Metro has no jurisdiction over street sitting fixtures or other appurtenances. The latter are controlled by individual cities and often contracted to third parties who support their costs through advertising revenues.

**Results:** Since the last three-year monitoring when all applicable facilities were in full compliance with these standards, the El Monte bus terminal has been reconstructed in conformance with these standards. No new facilities have been added.

## 7. Vehicle Assignment Standards

Adopted vehicle assignment standards include:

**Heavy Rail:** Maintained at a single facility

**Light Rail:** Primarily assigned based on compatibility of vehicle controllers with rail line(s) served. Wherever possible, no more than two vehicle types at each facility.

**Bus:** Assigned to meet vehicle seating requirements for lines served from each facility.

While these standards are consistently applied we have historically looked at the average age of vehicles assigned to each facility to ensure that there are no extremes serving any specific area. This is most applicable to the bus system, but the data for rail is provided as well.

#### Heavy Rail – Vehicle Age by Facility

Model	# Active	Average Age (years)
-------	----------	---------------------

Breda 650 Base	30	26.4
Breda 650 Option	74	20.6
	<b>104</b>	<b>22.3</b>

Light Rail – Vehicle Age by Facility

Facility	Model	# Active	Average Age (years)
Div 11 – Long Beach	Nippon Sharyo 2020	15	24.5
	Siemens 2000 GE/ATP	7	17.1
	Kinkisharyo P3010	54	1.6
		<b>76</b>	<b>7.5</b>
Div 14 – Santa Monica	Siemens 2000 GE/ATP	15	15.9
	Kinkisharyo P3010	56	1.1
		<b>71</b>	<b>4.2</b>
Div 21 – Los Angeles	AnseldoBreda2550Base	15	8.6
	Kinkisharyo P3010	3	2.0
		<b>18</b>	<b>7.5</b>
Div 22 - Lawndale	Siemens 2000 Base	24	17.9
	Kinkisharyo P3010	21	0.6
		<b>45</b>	<b>9.8</b>
Div 24 - Monrovia	AnseldoBreda2550Base	35	10.0
	Kinkisharyo P3010	43	1.3
		<b>78</b>	<b>5.2</b>

**Results:** A couple of constraints apply to the light rail assignments. The Siemens 2000 Base vehicles may only operate from Div 22 (Green Line) because their controller package is not compatible with other lines. The AnseldoBreda2550Base vehicles may not be operated from Div 22 as they are too heavy for the Green Line. Each facility's average vehicle age is between 4 and 10 years which is consistently young for vehicles that should have a 30-year life span.

Bus – Vehicle Age by Facility – Directly Operated

Division	32-foot	40-foot	45-foot	60-foot	# of Buses	Avg. Age
1		141	35	21	197	9.3
2		174			174	7.8
3		86	88		174	9.0
5		138	7	48	193	7.1
7		140	64	6	210	7.2
8		61	101	34	196	9.1
9		162	56		218	9.1
10		73	14	80	167	9.4
13		72		87	159	9.2
15		87	99	50	236	10.3
18		73	99	61	233	9.4
		<b>1,207</b>	<b>563</b>	<b>387</b>	<b>2,157</b>	<b>8.9</b>

Bus – Vehicle Age by Facility – Purchased

Division	32-foot	40-foot	45-foot	60-foot	# of Buses	Avg. Age
95	16	19	4		39	7.3
97	5	69			74	1.2
98	29	24	8		61	6.9
	<b>50</b>	<b>112</b>	<b>12</b>		<b>174</b>	<b>4.5</b>

Bus – Vehicle Age Summary

	32-foot	40-foot	45-foot	60-foot	# of Buses	Avg. Age
	<b>50</b>	<b>1,319</b>	<b>575</b>	<b>387</b>	<b>2,331</b>	<b>8.6</b>

**Results:** The only extreme average age is that of Division 97 operated by a contractor who recently had their older fleet replaced with new buses. This division serves seven bus lines of which six are Minority lines and five of which are Low-Income lines. With that knowledge there appears to be no basis for a finding of biased bus assignments based upon age.

In conclusion, the results of the service monitoring indicate that the adopted systemwide standards are set properly with the exception of a few. Based on the results, Metro staff will be making minor adjustments to the service standards and will present them for Board approval to be included in the 2019 Title VI Program Update to be submitted to FTA.

## 16. Board Approval of Title VI Policies for Service and Fare Changes



Metro

Board Report

Los Angeles County  
Metropolitan Transportation  
Authority  
One Gateway Plaza  
3rd Floor Board Room  
Los Angeles, CA

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File #: 2019-0608, File Type: Policy

Agenda Number: 37.

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EXECUTIVE MANAGEMENT COMMITTEE  
SEPTEMBER 19, 2019

**SUBJECT: TITLE VI EQUITY ANALYSIS POLICIES**

**ACTION: APPROVE RECOMMENDATION**

**RECOMMENDATION**

ADOPT Title VI Equity Analysis Policies presented in Attachments A, B and C.

**ISSUE**

Title VI of the Civil Rights Act of 1964 (Title VI) prohibits discrimination on the basis of race, color, and national origin in programs that receive federal funding. The Federal Transportation Administration (FTA) requires transportation agencies to demonstrate their compliance with Title VI by adopting policies in compliance with FTA Circular 4702.1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," issued October 1, 2012. FTA requires the Metro Board of Directors to review and approve the Title VI Equity Analysis policies.

**BACKGROUND**

Section 601 of Title VI of the Civil Rights Act of 1964 (Title VI) states the following:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

FTA Circular 4702.1B, revised in 2012, requires transportation agencies to develop policies to assist in the evaluation of impacts to minority and low-income riders when considering service and fare changes. Metro's Title VI equity policies were adopted into the Administrative Code under Part 2-50 "Public Hearings". An amendment to this Part is being proposed to allow the adoption of Title VI Equity Policies to be updated by the Board of Directors as required, without impacting the Administrative Code.

The Title VI Equity Analysis policies consists of:

**A. Major Service Change Policy:** This policy defines what constitutes a major service change

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for the agency which will require a service equity analysis. Metro defines a Major Service Change as follows:

- a. All major increases or decreases in transit service are subject to a Title VI Equity Analysis prior to Board approval of the service change. A Title VI Equity Analysis completed for a major service change must be presented to the Board of Directors for their consideration and then forwarded to the FTA with a record of the action taken by the Board.
- b. A major service change is defined as any service change meeting at least one of the following criteria:
  1. A revision to an existing transit route that increases or decreases the route miles and/or the revenue miles operated by 25% or more at one time or cumulatively in any period within 36 consecutive months since the last major service change;
  2. A revision to an existing transit service that increases or decreases the scheduled trips operated by at least 25% at one time or cumulatively in any period within 36 consecutive months since the last major service change;
  3. An increase or decrease to the span of service of a transit line of at least 25% at any one time or cumulatively in any period within 36 consecutive months since the last major service change;
  4. The implementation of a new transit route that provides at least 50% of its route miles without duplicating other routes;
  5. Six months prior to the opening of any new fixed guideway project (e.g. BRT line or rail line) regardless of whether or not the amount of service being changed meets the requirements in the subsections 1 - 5 above to be inclusive of any bus/rail interface changes.
- c. Experimental, demonstration or emergency service changes may be instituted for one year or less without a Title VI Equity Analysis being completed and considered by the Board of Directors. If the service is required to be operated beyond one year the Title VI Equity Analysis must be completed and considered by the Board of Directors before the end of the one year experimental, demonstration or emergency.
- d. A Title VI Equity Analysis shall not be required if a Metro transit service is replaced by a different route, mode, or operator providing a service with the same headways, fare, transfer options, span of service and stops.

**B. Disparate Impact Policy:** Disparate impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color or national origin and

the policy lacks a substantial legitimate justification, including one or more alternatives that would serve the same legitimate objectives but with less disproportionate effects on the basis of race, color or national origin. This policy defines the threshold Metro will utilize when analyzing the impacts to minority populations and/or minority riders.

- a. For major service changes, a disparate impact will be deemed to have occurred if the absolute difference between the percentage of minority adversely affected and the overall percentage of minorities is at least five percent (5%).
- b. For any applicable fare changes, a disparate impact will be deemed to have occurred if the absolute difference between the percentage of minority adversely affected and the overall percentage of minorities is at least five percent (5%).

**C. Disproportionate Burden Policy:** Disproportionate burden refers to a neutral policy or practice that disproportionately affects low-income populations more than non low-income populations. A finding of disproportionate burden for major service and fare changes requires Metro to evaluate alternatives and mitigate burdens where practicable.

- a. For major service changes, a disproportionate burden will be deemed to exist if an absolute difference between percentage of low-income adversely affected by the service change and the overall percentage of low-income persons is at least five percent (5%).
- b. For fare changes, a disproportionate burden will be deemed to exist if an absolute difference between the percentage of low-income adversely affected and the overall percentage of low-income is at least five percent (5%).

#### *Metro's Title VI Obligations when evaluating service and fare changes*

Metro will utilize the Board adopted Title VI policies included in the agency's Board adopted Title VI Program Update when analyzing service and fare changes. The equity analysis will be completed during the planning stages of the proposed changes. The results of the analysis will be approved by the Metro Board of Directors and evidence of the Board action will be included in the next Title VI Program Update submitted to FTA.

Metro must submit a Title VI Program Update every three years. The last submitted Title VI Program Update was November 17, 2016. The next Title VI Program Update will be submitted on November 1, 2019.

## **DISCUSSION**

### Findings

Metro staff reviewed peer agencies Title VI Equity Policies and found that peer agencies had policies consistent with FTA Circular 4702.1B. Metro included an additional threshold when evaluating impact to Title VI protected groups. Metro staff in reviewing the additional threshold recommends that the absolute difference is considered when evaluating service and fare changes. Given that Metro's service area is predominately minority, the absolute difference allows for alternatives to be

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considered if a disparate impact or disproportionate burden is found when evaluation service and fare changes.

Considerations

Metro considered the Board adopted thresholds from the 2013 and 2016 Title VI Program updates and based on peer agencies comparison, Metro staff recommends for the Title VI Equity Policies to be adopted as recommended.

**DETERMINATION OF SAFETY IMPACT**

The requested action in this report will have no direct impact on the safety of Metro's employees or customers.

**FINANCIAL IMPACT**

Adoption of the Title VI Equity Policies has no direct impact upon Metro's expenditures or revenues. Approval is consistent with the implementation of service included in the adopted FY2020 Budget.

**IMPLEMENTATION OF STRATEGIC PLAN GOALS**

Recommendation supports strategic plan goal # 5, "Provide responsive, accountable and trustworthy governance within the Metro organization" by adhering to civil rights requirements mandated by FTA Title VI Circular 4702.1B.

**ALTERNATIVES CONSIDERED**

The alternative to not including Board approved Title VI Equity Policies could have significant negative impacts to the agency. Failure to include Board approved policies in the Title VI Program update may result in FTA not concurring Metro's Title VI Program Update which may result in suspension of federal grants by being non-compliant with civil rights requirements.

**NEXT STEPS**

The Title VI Program Update is scheduled for Board approval at the October 24, 2019 Board of Directors meeting. Upon Board approval, Metro's Title VI Program Update will be submitted to FTA by the due date of November 1, 2019.

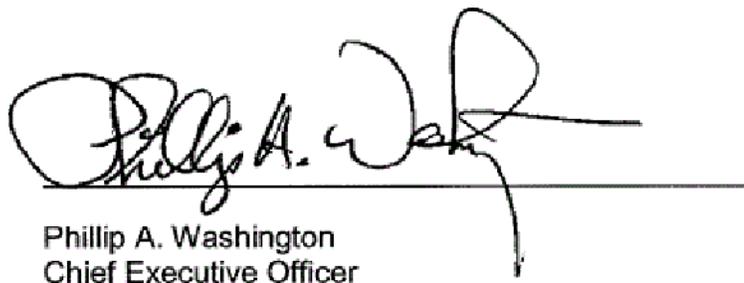
**ATTACHMENTS**

- Attachment A - Major Service Change Policy
- Attachment B - Disparate Impact Policy
- Attachment C - Disproportionate Burden Policy

Prepared by: Aida Berry, Senior Manager, Civil Rights Programs (Title VI), (213) 922-2748

Conan Cheung, Senior Executive Officer, Service Development, Scheduling & Analysis, (213) 418-3034

Reviewed by: Jonaura Wisdom, Chief of Civil Rights Programs, (213) 418-3168



Phillip A. Washington  
Chief Executive Officer



Los Angeles County  
Metropolitan Transportation Authority

**Metro**

**CERTIFICATION**

The undersigned, duly qualified and acting as Board Secretary of the Los Angeles County Metropolitan Transportation Authority, certifies that the following was approved, by majority vote of all members of the Board of Directors, at a regular meeting of the Los Angeles County Metropolitan Transportation Authority held on September 26, 2019.

**37. SUBJECT: TITLE VI EQUITY ANALYSIS POLICIES                      2019-0608**

ADOPTED ON CONSENT CALENDAR Title VI Equity Analysis Policies  
presented in Attachments A, B and C.

\_\_\_\_\_  
Michele Jackson, Metro Board Secretary

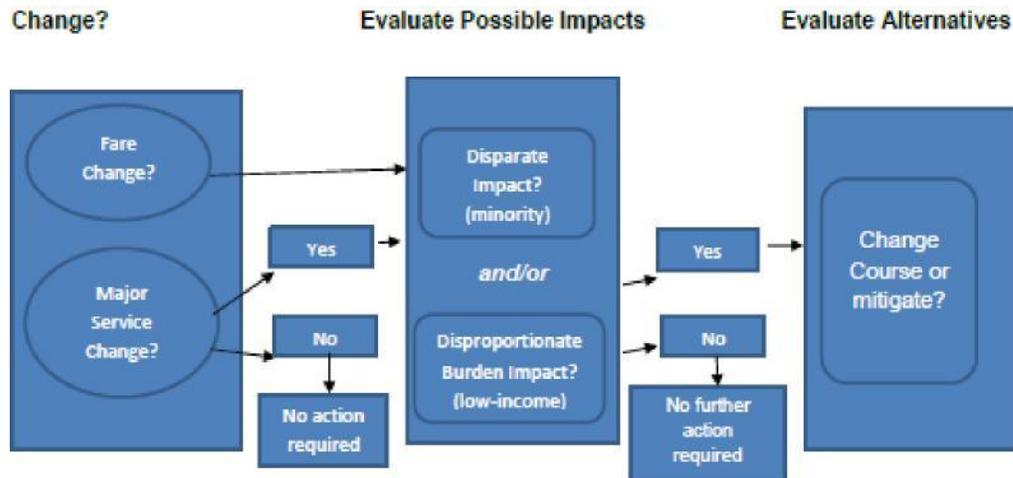


DATED: September 30, 2019

## Metro Major Service Change Policy

FTA Circular 4702.1B, revised in 2012, requires transportation agencies to develop policies to assist in the evaluation of impacts to minority and low-income riders when considering service and fare changes.

Figure 1: Overview of Metro’s Title VI Equity Analysis process



All changes in service meeting the definition of “Major Service Change” are subject to a Title VI Service Equity Analysis prior to Board approval of the service change. A Title VI Equity Analysis will be completed for all Major Service Changes and will be presented to the Board for its consideration and the results will be included in the subsequent Metro Title VI Program Update with a record of action taken by the Board. Service changes considered “Minor” due to not meeting the thresholds of a Major Service Change are also analyzed and alternatives considered are documented, however, a Service Equity Analysis is not performed.

For the 2019 FTA Title VI Program Update Major Service Change is defined as any service change meeting at least one of the following criteria:

1. A revision to an existing transit route that increases or decreases the route miles and/or the revenue miles operated by 25% or more at one time or cumulatively in any period within 36 consecutive months since the last major service change;
2. A revision to an existing transit service that increases or decreases the scheduled trips operated by at least 25% at one time or cumulatively in any period within 36 consecutive months since the last major service change;

3. An increase or decrease to the span of service of a transit line of at least 25% at any one time or cumulatively in any period within 36 consecutive months since the last major service change;
4. The implementation of a new transit route that provides at least 50% of its route miles without duplicating other routes;
5. Six months prior to the opening of any new fixed guideway project (e.g. BRT line or rail line) regardless of whether or not the amount of service being changed meets the requirements in the subsections 1 – 5 above to be inclusive of any bus/rail interface changes.
  - a. Experimental, demonstration or emergency service changes may be instituted for one year or less without a Title VI Equity Analysis being completed and considered by the Board of Directors. If the service is required to be operated beyond one year the Title VI Equity Analysis must be completed and considered by the Board of Directors before the end of the one year experimental, demonstration or emergency.
  - b. A Title VI Equity Analysis shall not be required if a Metro transit service is replaced by a different route, mode, or operator providing a service with the same headways, fare, transfer options, span of service and stops.

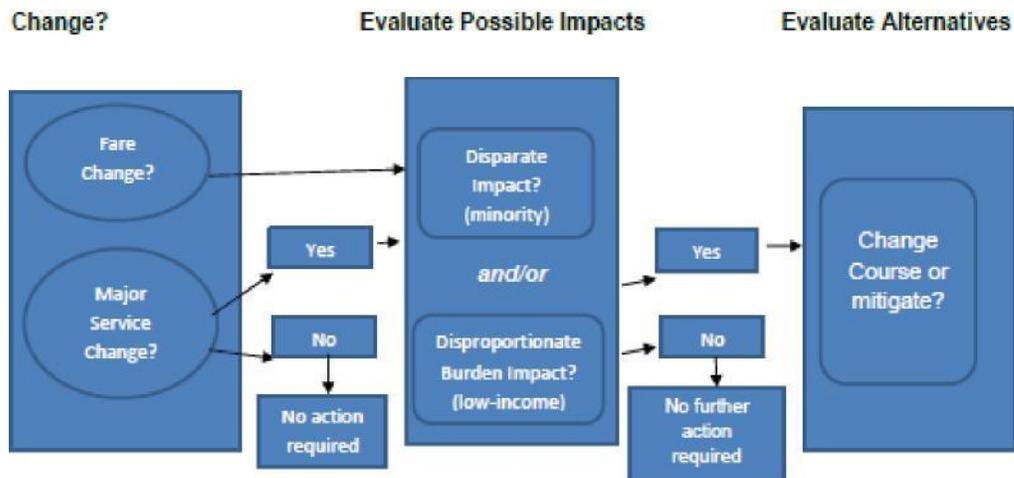
**Metro Disparate Impact Policy**

FTA Circular 4702.1B, revised in 2012, requires transportation agencies to develop policies to assist in the evaluation of impacts to minority and low-income riders when considering service and fare changes.

Testing for Disparate Impact evaluates effects on minority riders or populations as compared to non-minority riders or populations. “Minority” is defined as all persons who identify as being part of racial/ethnic groups besides white, non-Hispanic.

In the course of performing a Title VI Equity Analysis for possible disparate impact, Metro will analyze how the proposed major service change or fare change action could impact minority populations, as compared to non-minority populations.

**Figure 1: Overview of Metro’s Title VI Equity Analysis process**



In the event the proposed action has an adverse impact that affects protected populations more than other populations at a level that exceeds the thresholds established in the Board adopted Disparate Impact Policy, or that restricts the benefits of the service change to protected populations, the finding would be considered as a potential Disparate Impact. In the possible scenario of finding Disparate Impact, Metro will evaluate whether there is an alternative that would serve the same objectives and with a more equitable impact. Otherwise, Metro will take measures to minimize or mitigate the adverse impact of the proposed action.

The Disparate Impact Policy defines measures for determination of potential adverse impact on minority populations/riders from major service changes or any change in fares (increase or decrease) The policy is applied to both adverse effects and benefits of major service changes.

All changes in service meeting the definition of “Major Service Change” and any change in fares and/or fare media are subject to a Title VI Service Equity Analysis prior to Board approval of the change. A Title VI Equity Analysis will be completed for all Major Service Changes and all fare and/or fare media changes (increase or decrease). The results of the Title VI Equity Analysis will be presented to the Board for its consideration and the results will be included in the subsequent Metro Title VI Program Update with a record of action taken by the Board. Service changes considered “Minor” due to not meeting the thresholds of a Major Service Change are also analyzed and alternatives considered are documented, however, a Service Equity Analysis is not performed.

For the 2019 FTA Title VI Program Update:

Disparate impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color or national origin and the policy lacks a substantial legitimate justification, including one or more alternatives that would serve the same legitimate objectives but with less disproportionate effects on the basis of race, color or national origin. This policy defines the threshold Metro will utilize when analyzing the impacts to minority populations and/or minority riders.

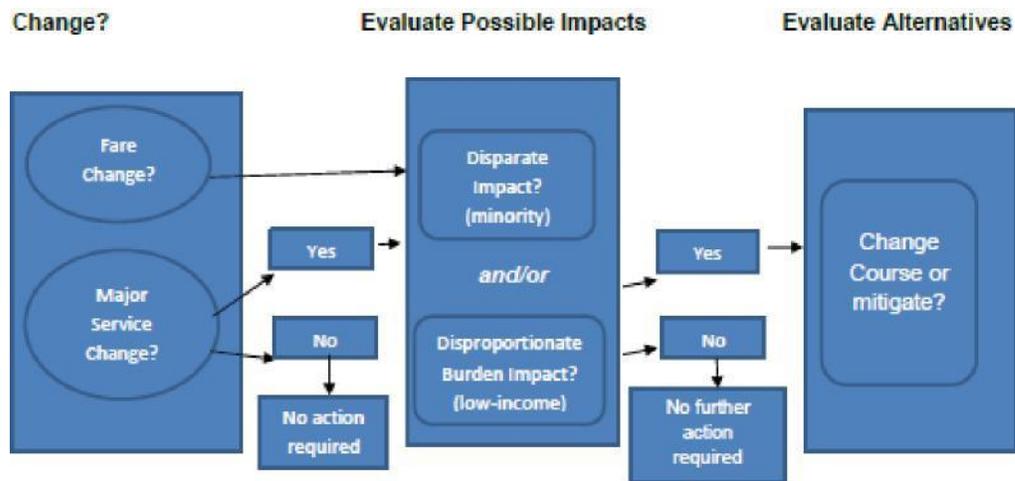
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- b. For any applicable fare changes, a disparate impact will be deemed to have occurred if the absolute difference between the percentage of minority adversely affected and the overall percentage of minorities is at least five percent (5%).

## Metro Disproportionate Burden Policy

FTA Circular 4702.1B, revised in 2012, requires transportation agencies to develop policies to assist in the evaluation of impacts to minority and low-income riders when considering service and fare changes.

Testing for Disproportionate Burden evaluates potential effects on low-income riders or populations, which Metro defines as \$41,500 which represents the median income of a three-person household in Los Angeles County. The line and system level evaluations are identical to those used to determine potential disparate impacts but compare low-income and non-low-income populations rather than minority and non-minority.

Figure 1: Overview of Metro’s Title VI Equity Analysis process



All changes in service meeting the definition of “Major Service Change” and any change in fares and/or fare media are subject to a Title VI Service Equity Analysis prior to Board approval of the change. A Title VI Equity Analysis will be completed for all Major Service Changes and all fare and/or fare media changes (increase or decrease). The results of the Title VI Equity Analysis will be presented to the Board for its consideration and the results will be included in the subsequent Metro Title VI Program Update with a record of action taken by the Board. Service changes considered “Minor” due to not meeting the thresholds of a Major Service Change are also analyzed and alternatives considered are documented, however, a Service Equity Analysis is not performed.

For the 2019 FTA Title VI Program Update:

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

- a. For major service changes, a disproportionate burden will be deemed to exist if an absolute difference between percentage of low-income adversely affected by the service change and the overall percentage of low-income persons is at least five percent (5%).
- b. For fare changes, a disproportionate burden will be deemed to exist if an absolute difference between the percentage of low-income adversely affected and the overall percentage of low-income is at least five percent (5%).

**17. Board Approval of Title VI Program Update**

**To Be added Upon Board Approval**