

Title VI Program Update

Office of Civil Rights, Racial Equity & Inclusion

Nation's Largest Clean-Air Fleet



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Executive Summary

This Title VI Program Update documents the steps the Los Angeles County Metropolitan Transportation Authority (Metro) has taken and will take to ensure Metro provides services without excluding or discriminating against individuals on the basis of race, color or national origin. In addition to the Title VI protected categories, Metro ensures that its programs and activities do not exclude or discriminate against low-income individuals or other classes protected by Federal or State law.

In 2018, the Metro Board of Directors approved the Equity Platform, which has a core objective of increasing access to opportunities. The Equity Platform has four pillars: Define and Measure, Listen and Learn, Focus and Deliver, and Train and Grow. Metro defines equity as both an outcome and a process aimed at addressing disparities to ensure fair and just access to opportunities for all customers.

Metro's Title VI Program follows the guidance set forth in the Federal Transit Administration (FTA) Circular 4702.1B and goes above and beyond the federal requirements. The Title VI Program covers Chapter III requirements for all recipients and Chapter IV requirements for Fixed Route Transit Providers. The Board approved Title VI policies were developed with public participation as they were presented at Metro's five Service Councils. Metro's Board adopted the Service Standards and the Results of the Service Monitoring. Furthermore, Metro's Public Participation Plan includes innovative outreach ideas and a threshold for public involvement. Metro's Language Assistance Plan provides language assistance to the Limited English Proficient (LEP) members of the community and tools to Metro staff when communicating with LEP customers.

Metro is unique among the nation's transportation agencies. It serves as transportation planner, 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. We are pleased to submit the 2025 Title VI Program Update.

Vision Statement

Metro provides excellence in service and support.

Metro's Mission Statement

To provide a world-class transportation system that enhances quality of life for all who live, work, and play within LA County.

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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 on October 1, 2012. This Program Update is for the period of December 1, 2025, to November 30, 2028.

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 Althea Bovell, Deputy Chief, Office of Civil Rights, Racial Equity & Inclusion, or Joanna Lemus, Senior Manager of Civil Rights Programs (Title VI) at Lemusj@metro.net or at (213) 922-4067.

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 the public is aware of their 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:

- > A statement that the agency operates programs without regard to race, color, or national origin;
- > A description of the procedures that the public should follow to request additional information regarding Metro's Title VI obligations.
- > A description of the procedures that the public must follow 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 is disseminated throughout Metro's rail and bus system. (Figure 1) It has been placed in backlit cases in almost all rail stations. (Figure 2) 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 also placed on buses. The notice is also available at Metro's Customer Centers.

The Civil Rights Notice has been translated into the top languages identified in Metro's Language Assistance Plan: Spanish, Korean, Chinese, Japanese, Armenian, Russian, and Vietnamese. The Civil Rights Policy found on Metro's website has also been translated into seven languages and with the assistance of Google Translate, may be translated into additional languages. A list of locations where the Civil Rights Notice is posted is included in this section.

List of Locations:

Line	Station
A Line	103rd Street / Watts Towers Station
A Line	Allen
A Line	APU / Citrus College
A Line	Arcadia
A Line	Azusa Downtown
A Line	Chinatown
A Line	Duarte / City of Hope
A Line	Del Mar
A Line	Del Mar
A Line	Fillmore
A Line	Firestone Station
A Line	Grand / LATTC Station
A Line	Heritage Square / Arroyo
A Line	Irwindale
A Line	Irwindale
A Line	Lincoln Heights / Cypress Park
A Line	Lake
A Line	Memorial Park
A Line	Monrovia
A Line	Monrovia
A Line	Sierra Madre Villa
A Line	South Pasadena
A Line	Southwest Museum
A Line	Union - A Line
A Line	Willow Street
A Line	San Pedro Street
A Line	Washington
ABDE Line	7th Street / Metro Center
B Line	Hollywood / Highland
B Line	Hollywood / Vine
B Line	Hollywood / Western
B Line	Universal / Studio City
B Line	Vermont / Beverly
B Line	Vermont / Santa Monica
B Line	Vermont / Santa Monica
B Line	Vermont / Sunset
B Line	Vermont / Sunset
BD Line	Civic Center / Grand Park
BD Line	Pershing Square

Line	Station
BD Line	Union - B/D Line
BD Line	Union - B/D Line
BD Line	Union - B/D Line
BD Line	Westlake / MacArthur Park
BD Line	Wilshire / Vermont
BD Line	Wilshire / Vermont
C Line	Avalon
C Line	Crenshaw
C Line	Douglas
C Line	El Segundo
C Line	Hawthorne / Lennox
C Line	Lakewood Blvd
C Line	Mariposa
C Line	Norwalk
C Line	Redondo Beach
C Line	Vermont / Athens
D Line	Wilshire / Western
E Line	Atlantic
E Line	26th Street / Bergamot
E Line	Downtown Santa Monica
E Line	East LA Civic Center
E Line	Expo Park / USC
E Line	Farmdale
E Line	Indiana
E Line	Jefferson / USC
E Line	La Cienega / Jefferson
E Line	LATTC / Ortho Institute
E Line	Mariachi Plaza / Boyle Heights
E Line	Maravilla
E Line	Palms
E Line	Soto
E Line	Westwood / Rancho Park
E Line	Expo / Crenshaw
E Line	Expo / Crenshaw
E Line	Expo / Vermont
E Line	Expo / Western
AE Line	Grand Av Arts / Bunker Hill
AE Line	Historic Broadway
AE Line	Little Tokyo / Arts District
BG Line	North Hollywood

Line	Station
G Line	Balboa
G Line	Canoga
G Line	Chatsworth
G Line	De Soto
G Line	Laurel Canyon
G Line	Nordhoff
G Line	Pierce College
G Line	Roscoe
G Line	Reseda
G Line	Sepulveda
G Line	Sherman Way
G Line	Tampa
G Line	Valley College
G Line	Van Nuys
G Line	Warner Center Transit Hub
G Line	Woodman
G Line	Woodley
J Line	37th St / USC
J Line	Harbor Fwy / Carson
J Line	Cal State LA Busway
J Line	USC Medical Ctr
J Line	El Monte Bus Station
J Line	Harbor Gateway Transit Center
J Line	Harbor Transitway / Manchester
J Line	Harbor Fwy / Pacific Coast
J Line	Harbor Transitway / Rosecrans
J Line	Harbor Transitway / Slauson
K Line	Expo/Crenshaw
K Line	Fairview Heights
K Line	Hyde Park
K Line	Leimert Park
K Line	MLK Jr

2. Complaint Procedures 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's 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.

A copy of the Civil Rights Policy is included in Attachment A and 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."

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



Metro

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 (Optional)

Date

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

To comply with 49 CFR Section 21.9(b), Metro's Office of Civil Rights, Racial Equity & Inclusion (OCRREI) maintains a list of all active customer 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 July 1, 2022, to May 22, 2025, Metro had three substantiated Title VI-related complaints.

Complaints

Metro customers most commonly interact with bus operators. Therefore, most Title VI complaints involve customers alleging discrimination by a bus operator. In all matters, the complaint is sent to the operator's division manager and to the Office of Civil Rights, Racial Equity & Inclusion (OCRREI) group by Customer Relations. The division manager or their designee reviews the complaint, takes a statement from the operator, and sends a transcript of the statement to OCRREI.

Metro buses are equipped with a digital recording device. 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 division manager reviews the recording and then prepares a report and sends the report to OCRREI. This report includes the bus operator's version of events, the division manager's observations of the recording, a history of all complaints against the operator for the prior 36 months, and any disciplinary actions taken in response to any complaints.

OCRREI investigators review all division reports. The investigators have the discretion to ask the division manager for more information about the incident, including asking the operator follow-up questions. The investigator may also review the digital recording themselves, contact 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 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 the available information, they write a report that analyzes the information presented in the complaint, the evidence received in the investigation 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 two levels of review. All complaint investigations are reviewed by the Sr. Executive Officer, EEO, Civil Rights Programs and County Counsel. Once the report and findings are finalized and reviewed, a letter is sent to the complainant and

respondent stating that an investigation was conducted and that the matter is closed, and the complaint is formally closed.

A list of Metro Title VI-related complaints from July 1, 2022, to May 22, 2025, is included in this section.

Investigations

There were no investigations conducted by external entities during this reporting period.

Lawsuits

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

Date Reported	Source of Complaint	Case #	Outcome	Finding	Allegation/s	Last Workflow Status	Initial Closure Date
07/14/2022	Patron	00320-2022	Investigation	Not Substantiated	Race	Closed	04/18/2023
07/21/2022	Patron	00331-2022	Investigation	Not Substantiated	Race	Closed	06/22/2023
08/05/2022	Patron	00341-2022	Inquiry	Not Substantiated	Race	Closed	08/09/2022
08/16/2022	Patron	00360-2022	Investigation	Not Substantiated	Race	Closed	10/18/2022
08/16/2022	Patron	00361-2022	Investigation	Not Substantiated	National Origin	Closed	06/22/2023
10/07/2022	Patron	00423-2022	Investigation	Not Substantiated	Race	Closed	06/15/2023
10/11/2022	Patron	00425-2022	Investigation	Not Substantiated	Race	Closed	07/18/2023
11/01/2022	Patron	00446-2022	Investigation	Not Substantiated	National Origin, Race	Closed	07/28/2023
11/16/2022	Patron	00477-2022	Investigation	Not Substantiated	Race	Closed	07/28/2023
12/13/2022	Patron	00505-2022	Investigation	Not Substantiated	Race	Closed	09/12/2023
12/13/2022	Patron	00511-2022	Investigation	Not Substantiated	Race	Closed	09/11/2023
12/22/2022	Patron	00504-2022	Investigation	Substantiated	Race	Closed	02/14/2023
12/22/2022	Patron	00507-2022	Investigation	Not Substantiated	National Origin, Sex	Closed	08/17/2023
12/23/2022	Patron	00508-2022	Inquiry	Not Substantiated	Race	Closed	12/28/2022
12/27/2022	Patron	00006-2023	Inquiry	Not Substantiated	Race	Closed	01/06/2023
12/27/2022	Patron	00029-2023	Investigation	Not Substantiated	National Origin, Race, Color	Closed	01/30/2024
12/30/2022	Patron	00032-2023	Investigation	Not Substantiated	Race	Closed	12/19/2023
01/05/2023	Patron	00023-2023	Informal Resolution	Substantiated	Race, Other	Closed	04/17/2023
01/12/2023	Patron	00036-2023	Investigation	Not Substantiated	Race, National Origin	Closed	04/12/2024
03/02/2023	Patron	00102-2023	Investigation	Substantiated	Race	Closed	04/10/2023
03/24/2023	Patron	00143-2023	Investigation	Not Substantiated	National Origin	Closed	02/08/2024
03/28/2023	Patron	00152-2023	Investigation	Not Substantiated	Race	Closed	03/06/2024
06/13/2023	Patron	00363-2023	Investigation	Not Substantiated	Age (40 and over), Race	Closed	04/02/2024
06/21/2023	Patron	00356-2023	Investigation	Not Substantiated	National Origin, Sexual Harassment	Closed	09/05/2023
06/26/2023	Patron	00331-2023	Investigation	Not Substantiated	National Origin	Closed	02/26/2024
06/26/2023	Patron	00341-2023	Investigation	Not Substantiated	National Origin, Color	Closed	02/13/2024
07/14/2023	Patron	00401-2023	Investigation	Not Substantiated	Race	Closed	09/05/2023
07/17/2023	Patron	00400-2023	Investigation	Not Substantiated	Race, Sexual Orientation	Closed	02/05/2024
08/11/2023	Patron	00506-2023	Investigation	Not Substantiated	Race	Closed	12/19/2023
08/17/2023	Patron	00543-2023	Investigation	Not Substantiated	Color, Disability	Closed	10/18/2023
08/24/2023	Patron	00508-2023	Inquiry	Not Substantiated	Race	Closed	08/31/2023
11/14/2023	Patron	00676-2023	Investigation	Not Substantiated	National Origin	Closed	02/26/2024
11/14/2023	Patron	00732-2023	Referred	Not Substantiated	Other, National Origin	Closed	12/19/2023
11/16/2023	Patron	00691-2023	Investigation	Not Substantiated	Color, Race	Closed	03/01/2024
11/29/2023	Patron	00708-2023	Investigation	Not Substantiated	Race, Color	Closed	02/07/2024
12/01/2023	Patron	00715-2023	Investigation	Not Substantiated	Race, Color	Closed	03/01/2024
12/01/2023	Patron	00716-2023	Investigation	Not Substantiated	Color, Race	Closed	06/14/2024
12/12/2023	Patron	00748-2023	Investigation	Not Substantiated	National Origin	Closed	04/12/2024
12/13/2023	Patron	00747-2023	Investigation	Not Substantiated	National Origin	Closed	04/02/2024
01/19/2024	Patron	00060-2024	Investigation	Not Substantiated	Color, Race	Closed	06/14/2024
01/26/2024	Patron	00132-2024	Investigation	Not Substantiated	Race, National Origin	Closed	04/12/2024
03/18/2024	Patron	00216-2024	Investigation	Not Substantiated	Race	Closed	06/14/2024
03/19/2024	Patron	00179-2024	Investigation	Not Substantiated	National Origin	Closed	03/20/2025
04/01/2024	Patron	00198-2024		Not Substantiated	Color	Closed	06/21/2024
04/03/2024	Patron	00218-2024	Inquiry	Not Substantiated	Age (40 and over), Color, Race	Closed	04/26/2024
04/05/2024	Patron	00210-2024	Investigation	Not Substantiated	Color, Race	Closed	07/29/2024
04/09/2024	Patron	00215-2024	Investigation	Not Substantiated	Sexual Orientation, National Origin	Closed	07/29/2024
04/19/2024	Patron	00242-2024	Investigation	Not Substantiated	National Origin, Race, Color	Closed	06/14/2024
05/08/2024	Patron	00364-2024	Investigation	Not Substantiated	Color, Race	Closed	08/29/2024
07/12/2024	Patron	00490-2024	Investigation	Not Substantiated	Race	Closed	01/15/2025
07/18/2024	Patron	00868-2024	Investigation	Not Substantiated	Race, Color	Closed	02/24/2025
07/19/2024	Patron	00513-2024	Investigation	Not Substantiated	Race	Closed	11/07/2024
07/22/2024	Patron	00514-2024	Investigation	Not Substantiated	National Origin, Race	Closed	01/15/2025
08/16/2024	Patron	00584-2024	Investigation	Not Substantiated	Color, Race	Closed	12/30/2024
08/16/2024	Patron	00602-2024	Other	Not Substantiated	Race, National Origin, National Origin	Closed	11/07/2024
09/06/2024	Patron	00654-2024			Color, Race	Review / Pending	
09/17/2024	Patron	00700-2024	Investigation	Not Substantiated	Race	Closed	01/15/2025
09/24/2024	Patron	00699-2024	Investigation	Not Substantiated	Race	Closed	01/15/2025
09/25/2024	Patron	00698-2024	Investigation	Not Substantiated	Race	Closed	01/15/2025
10/01/2024	Patron	00748-2024	Investigation	Not Substantiated	Color, Race	Closed	11/07/2024
10/02/2024	Patron	00796-2024	Investigation	Not Substantiated	National Origin	Closed	03/18/2025
10/23/2024	Patron	00779-2024	Investigation	Not Substantiated	Race, Color	Closed	01/15/2025
11/06/2024	Patron	00830-2024	Investigation	Not Substantiated	Race, Color	Closed	03/20/2025
12/05/2024	Patron	00894-2024	Investigation	Not Substantiated	Age (40 and over), Race, Disability, Religion	Closed	03/18/2025
12/25/2024	Patron	00896-2024	Investigation	Not Substantiated	Color, Race	Closed	01/15/2025
02/04/2025	Patron	2025-074	Investigation	Not Substantiated	Race	Closed	04/17/2025
02/14/2025	Patron	2025-163			Race	New Case	
03/07/2025	Patron	2025-164			Race	New Case	
03/07/2025	Patron	2025-165			Race	New Case	
03/11/2025	Patron	2025-133	Other	Not Substantiated	Race	Closed	04/25/2025
03/17/2025	Patron	2025-166			Race	New Case	
03/26/2025	Patron	2025-261			Race	New Case	
03/28/2025	Patron	2025-262			Race	New Case	
04/07/2025	Patron	2025-222			Race	New Case	
04/07/2025	Patron	2025-227	Other	Not Substantiated	Race	Closed	04/10/2025
04/09/2025	Patron	2025-263			Race	New Case	
04/14/2025	Patron	2025-264			Race	New Case	

4. Public Participation Plan

Pursuant to FTA Title VI regulations and FTA guidance 4702.1B, Metro made minor updates to its Public Participation Plan (Plan). The 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 (LEP) Persons, minority communities, low-income communities, and communities with disability.

Furthermore, Metro has integrated its Equity Platform into the Plan. The Equity Platform includes Title VI protected groups and expands into other protected groups and vulnerable populations such as low-income, disability, gender, age and sexual orientation. Included below is an Executive Summary of Metro's public participation and outreach efforts. The Plan is found in Attachment B.

The Plan summarizes Metro's current public outreach and public engagement strategies including transit and highway studies, construction projects, joint development and transit-oriented communities, transit safety programs, accessibility outreach and various projects.

Executive Summary

This Public Participation Plan (Plan) has been assembled to capture the methods and procedures by which the Los Angeles County Metropolitan Transportation Authority (Metro) demonstrates its commitment to meet and exceed the prescribed requirements of the U.S. Department of Transportation (USDOT). The Plan is meant to address these specific USDOT policies and manuals:

- > Federal Transit Administration (FTA) Circular C 4702.1B citing recipients' responsibilities to Limited English Proficient (LEP) persons.
- > 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.

Every three years, Metro updates the Plan per the requirements listed above. Metro sought input from the public for the Plan from May 19, 2025, to June 18, 2025, to ensure we are fulfilling our commitment to inform the public about Metro projects, programs and initiatives. Metro staff received comments and updated the Plan based on new outreach tools that could support Metro's commitment to go above and beyond federally prescribed requirements. The Plan can be found in Attachment B.

5. Meaningful Access to Limited English Proficiency (LEP) Persons

Metro supports the goals of Title VI of the Civil Rights Act of 1964, 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 USDOT guidance concerning LEP persons with limited 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; and

Factor 4: The resources available to the recipient

In 2025 Metro updated the Four Factor Analysis to determine the language assistance needs of our customers. Metro utilized the results of the updated Four Factor Analysis to create a language assistance plan that identifies the appropriate languages needed for 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 below.

Metro's LEP Languages based on the results of the Four-Factor Analysis are:

- > Armenian
- > Chinese (Traditional)
- > Korean
- > Japanese
- > Russian
- > Spanish
- > Vietnamese

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 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 Source

The following data source was 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, however, it yields weighted estimates that are more current than provided in the decennial censuses.

LOS ANGELES COUNTY LEP POPULATION

Language Spoken at Home (Age 5 and older)	Total Pop	LEP Pop = Less Than Very Well		
		Number	Pct of Total Pop	Pct of LEP Pop
Total:	9,188,375			
Speak only English	4,121,257			
Speak language other than English	5,067,118	2,193,171	23.87%	
Spanish:	3,461,694	1,487,932	16.19%	67.84%
Chinese (incl. Mandarin, Cantonese):	391,051	226,512	2.47%	10.33%
Korean:	151,899	93,678	1.02%	4.27%
Armenian:	175,539	80,165	0.87%	3.66%
Tagalog (incl. Filipino):	213,157	65,704	0.72%	3.00%
Vietnamese:	74,474	44,307	0.48%	2.02%
Persian (incl. Farsi, Dari):	72,784	26,066	0.28%	1.19%
Russian:	54,392	25,998	0.28%	1.19%
Japanese:	45,733	18,681	0.20%	0.85%
Arabic:	46,061	14,663	0.16%	0.67%
Thai, Lao, or other Tai-Kadai languages:	24,197	14,491	0.16%	0.66%
Khmer:	25,288	14,233	0.15%	0.65%
Other languages of Asia:	16,289	9,012	0.10%	0.41%
Ilocano, Samoan, Hawaiian, or other Austronesian languages:	22,589	8,491	0.09%	0.39%
Bengali:	14,551	7,027	0.08%	0.32%
French (incl. Cajun):	39,422	5,589	0.06%	0.25%
Hindi:	30,680	4,883	0.05%	0.22%
Other and unspecified languages:	10,594	4,303	0.05%	0.20%
Hebrew:	18,045	4,285	0.05%	0.20%
Portuguese:	19,918	4,258	0.05%	0.19%
Punjabi:	11,490	3,010	0.03%	0.14%
Amharic, Somali, or other Afro-Asiatic languages:	8,842	3,000	0.03%	0.14%
Other Indo-European languages:	11,554	2,957	0.03%	0.13%
Urdu:	7,901	2,930	0.03%	0.13%
Ukrainian or other Slavic languages:	8,266	2,664	0.03%	0.12%
Nepali, Marathi, or other Indic languages:	9,029	2,632	0.03%	0.12%
Swahili or other languages of Central, Eastern, and Southern Africa:	5,122	2,361	0.03%	0.11%
Italian:	13,026	1,812	0.02%	0.08%
Yoruba, Twi, Igbo, or other languages of Western Africa:	11,782	1,742	0.02%	0.08%
Greek:	6,054	1,658	0.02%	0.08%
Gujarati:	7,086	1,649	0.02%	0.08%
German:	17,006	1,405	0.02%	0.06%
Haitian:	4,714	1,281	0.01%	0.06%
Polish:	5,112	1,275	0.01%	0.06%
Serbo-Croatian:	6,224	1,261	0.01%	0.06%
Telugu:	6,778	1,256	0.01%	0.06%

Factor 2: The frequency with which LEP individuals come in contact with the program.

To determine the frequency of interactions with LEP individuals, Metro used its call records from its contracted phone interpretation service to help identify what language assistance Metro’s customers need most frequently. The Language Line call records from January 2023 to April 2025 are included in this section to help assess the languages spoken by Metro customers. Additionally, Metro contracted with Community Connections to conduct factors two and three of the four factor analysis used to satisfy the requirements of Metro’s Title VI Program Update (Exhibit A).

2023 – Language Line Calls

Language	Calls	Minutes	Avg. Minutes	% of Total
MANDARIN	913	10764	11.8	31.43
KOREAN	841	9180	10.9	28.95
RUSSIAN	299	3069	10.3	10.29
CANTONESE	168	1937	11.5	5.78
JAPANESE	151	1871	12.4	5.2
SPANISH	147	894	6.1	5.06
ARMENIAN	145	1481	10.2	4.99
VIETNAMESE	87	959	11	2.99
FARSI	45	599	13.3	1.55
THAI	36	426	11.8	1.24
TAGALOG	20	243	12.2	0.69
KHMER	11	119	10.8	0.38
FRENCH	8	93	11.6	0.28
AMHARIC	5	35	7	0.17
BENGLI	4	105	26.3	0.14
GERMAN	3	12	4	0.1
INDONESIAN	3	51	17	0.1
PORTUGUESE	3	61	20.3	0.1
ARABIC	3	35	11.7	0.1
BURMESE	2	15	7.5	0.07
MONGOLIAN	2	43	21.5	0.07
CROATIAN	1	10	10	0.03
NEPALI	1	8	8	0.03
ROMANIAN	1	10	10	0.03
TURKISH	1	10	10	0.03
ITALIAN	1	5	5	0.03
DARI	1	3	3	0.03
GUJARATI	1	7	7	0.03
HINDI	1	19	19	0.03
PUNJABI	1	21	21	0.03

2024 – Languages Line Calls

Language	Calls	Minutes	Avg. Minutes	% of Total
MANDARIN	1071	12015	11.2	34.85
KOREAN	765	7782	10.2	24.89
RUSSIAN	313	3008	9.6	10.19
CANTONESE	208	2375	11.4	6.77
SPANISH	163	1130	6.9	5.3
ARMENIAN	161	1494	9.3	5.24
JAPANESE	114	1206	10.6	3.71
VIETNAMESE	94	998	10.6	3.06
FARSI	45	578	12.8	1.46
THAI	27	322	11.9	0.88
KHMER	26	181	7	0.85
TAGALOG	21	198	9.4	0.68
FRENCH	10	134	13.4	0.33
DARI	8	107	13.4	0.26
ARABIC	7	80	11.4	0.23
AMHARIC	6	41	6.8	0.2
BENGALI	5	59	11.8	0.16
PORTUGUESE	4	30	7.5	0.13
GERMAN	4	51	12.8	0.13
PUNJABI	3	47	15.7	0.1
TOISHANESE	2	19	9.5	0.07
INDONESIAN	2	28	14	0.07
ITALIAN	2	12	6	0.07
URDU	2	21	10.5	0.07
TONGAN	1	2	2	0.03
HAITIAN CREOLE	1	12	12	0.03
TURKISH	1	5	5	0.03
NEPALI	1	11	11	0.03
GEORGIAN	1	3	3	0.03
HINDI	1	2	2	0.03
POLISH	1	25	25	0.03
UKRAINIAN	1	6	6	0.03
MONGOLIAN	1	12	12	0.03
TIGRIGNA	1	43	43	0.03

2025 (January – April) – Language Calls

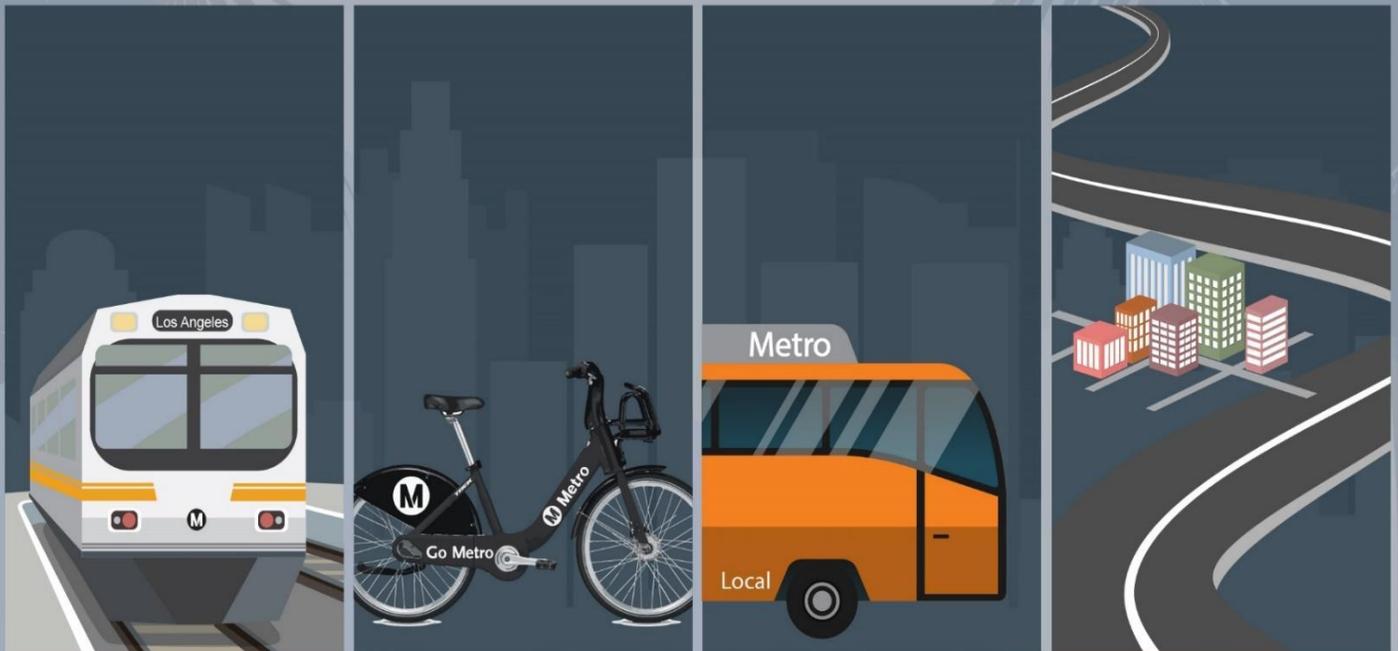
Language	Calls	Minutes	Avg. Minutes	% of Total
MANDARIN	304	3521	11.6	37.81
KOREAN	229	2232	9.7	28.48
CANTONESE	61	733	12	7.59
ARMENIAN	48	395	8.2	5.97
RUSSIAN	42	453	10.8	5.22
SPANISH	34	290	8.5	4.23
JAPANESE	25	230	9.2	3.11
VIETNAMESE	16	172	10.8	1.99
FARSI	12	170	14.2	1.49
THAI	9	69	7.7	1.12
TAGALOG	6	100	16.7	0.75
KHMER	4	32	8	0.5
BENGALI	3	21	7	0.37
HUNGARIAN	3	23	7.7	0.37
FRENCH	2	18	9	0.25
MONGOLIAN	1	3	3	0.12
AMHARIC	1	13	13	0.12
HINDI	1	8	8	0.12
ITALIAN	1	5	5	0.12
PORTUGUESE	1	5	5	0.12
TURKISH	1	6	6	0.12



The Los Angeles Metropolitan Transportation Authority (Metro) - Limited English Proficiency (LEP) Study 2025

Factor 2 Analysis - The Frequency of Contacts with Limited English Proficiency (LEP) Individuals

Factor 3 Analysis - Assess the Importance of Metro's Programs, Activities or Services



INTRODUCTION

Title VI of the Civil Rights Act of 1964 protects people from discrimination on the basis of national origin. In compliance with Title VI, every three years all public transportation agencies are required to submit a report on demographics and Limited English Proficiency individuals.

This information is important not only because it is required by law, but because it will also help LA Metro improve services to its users, especially those of the LEP population.

LEP DEFINITION

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

AUTHORITY

The legal authority for the LEP data collection and Study is based on the following:

- a. Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq.
- b. Federal Transit Laws, Title 49, United States Code, Chapter 53.
- c. 49 CFR § 1.51.
- d. 49 CFR part 21.
- e. 28 CFR § 42.401 et seq.
- f. Federal Transit Administration CIRCULAR - FTA C 4702.1B dated October 1, 2012.

These documents provide recipients of Federal Transit Administration (FTA) financial assistance with guidance and instructions necessary to carry out U.S. Department of Transportation (“DOT” or “the Department”) Title VI regulations (49 CFR part 21) and to integrate into their programs and activities considerations expressed in the Department’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (“LEP”) Persons (70 FR 74087, December 14, 2005).

The Federal Transit Administration works to ensure nondiscriminatory methods regarding transportation in support of its mission to enhance the social and economic quality of life for all Americans.

To comply with DOT Title VI regulations the Community Connections team conducted qualitative research with 14 community based organizations and one individual interview representing 15 different language groups in Los Angeles County, the second-largest metropolitan area in the United States. Focus group discussions were held making use of a facilitator’s guide developed for the purpose. Discussion questions regarding Metro opened up each focus group to spark conversation, and closed with a survey completed by each attendee. Additionally, Metro executed an online survey with Metro employees who have regular contact with LEP persons during their daily work routine. These address Factor 3: Assess the importance of Metro’s Programs, activities or services, and Factor 2: The frequency of contacts with limited English proficiency (LEP) individuals, respectively.

DATA ANALYSIS

For purposes of the 2025 LEP Study and Report for LACMTA, the Community Connections team is using the most recent American Community Survey (ACS) dataset and the data collected during the community based organizations focus groups/interview.

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Serbo-Croatian:	6,224	1,261	0.01%	0.06%
Telugu:	6,778	1,256	0.01%	0.06%

Source: U.S. Census Bureau, 2023 American Community Survey 1-Year Estimates

CONTENTS OF THE LEP STUDY

In compliance with the Title VI Program, LA Metro's public participation plan includes outreach components to engage diverse community stakeholders and limited English proficient populations. The top 15 language groups were targeted by population based on the 2020 Census report attached in this report. The Community Connections team have traditionally reached underserved and marginalized communities for this effort, such as low-income populations, seniors, those that do not own a vehicle and rely on Metro to get to work, school, doctor appointments or to do their shopping, and more.

PROMOTING INCLUSIVE PUBLIC PARTICIPATION

The content and considerations of Title VI, the Executive Order on LEP, and the DOT LEP Guidance has been integrated into LA Metro's established public participation plan or process which includes proactive strategies, procedures, and desired outcomes that underpin public participation activities.

The LA Metro Title VI Program is based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available. Efforts have advanced to involve diverse LEP populations in public participation activities and include both comprehensive measures, such as placing public notices at all transit stations, bus stops, and on vehicles, as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent marginalized community members and LEP persons from effectively participating in a recipient's decision-making process.

REQUIREMENT TO PROVIDE MEANINGFUL ACCESS TO LEP PERSONS

In accordance with Title VI of the Civil Rights Act of 1964, recipients of federal financial assistance shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited-English proficient (LEP). The Federal Transit Administration (FTA) provides specific guidance's for its funding recipients, including the U.S. Department of transportation's LEP guidance. (70 FR 74087, Dec. 14, 2005). Recipients are also encouraged to review DOJ's guidelines on self-assessment, Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted Programs (May 2011), as well as other materials, available at www.lep.gov, to support language access.

FOUR FACTOR ANALYSIS

In order to ensure meaningful access to programs and activities, recipients shall use the information obtained in the Four Factor Analysis to determine the specific language services that are appropriate to provide. A careful analysis can help a recipient determine if it communicates effectively with LEP persons and will inform language access planning. The Four Factor Analysis is an individualized assessment that balances the following four factors:

(1) The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient. This population will be program specific. In addition to the number or proportion of LEP persons served, the recipient's analysis should, at a minimum, identify:

- (a) How LEP persons interact with the recipient's agency;
- (b) Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language group;
- (c) The literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice; and
- (d) Whether LEP persons are underserved by the recipient due to language barriers.

(2) The frequency with which LEP persons come into contact with the program. Recipients should survey key program areas and assess major points of contact with the public, such as:

- (a) Use of bus and rail service; (b) Purchase of passes and tickets through vending machines, outlets, websites, and over the phone;
- (c) Participation in public meetings;
- (d) Customer service interactions;
- (e) Ridership surveys;
- (f) Operator surveys.

(3) The nature and importance of the program, activity, or service provided by the program to people's lives. Generally speaking; the more important the program, the more frequent the contact and the likelihood that language services will be needed. The provision of public transportation is a vital service, especially for people without access to personal vehicles. An MPO's regional planning activities will impact every person in a region. Development of a coordinated plan to meet the specific transportation needs of seniors and people with disabilities will often also meet the needs of LEP persons. A person who is LEP may have a disability that prevents the person from using fixed route service, thus making the person eligible for ADA complementary paratransit. Transit providers, States, and MPOs must assess their programs, activities and services to ensure they are providing meaningful access to LEP persons. Facilitated meetings with LEP persons are one method to inform the recipient on what the local LEP population considers to be an essential service, as well as the most effective means to provide language assistance.

(4) The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach. Resource and cost issues can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations and Federal agencies. Large entities and those entities serving a

significant number of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance. Developing a Language Assistance Plan. After completing the Four Factor Analysis, the recipient shall use the results of the analyses to determine which language assistance services are appropriate. Additionally, the recipient shall develop an assistance plan to address the identified needs of the LEP population(s) it serves. The DOT LEP Guidance recognizes that certain recipients, such as those serving very few LEP persons or those with very limited resources, may choose not to develop a written plan. However, FTA has determined it is necessary to require its recipients to develop an assistance plan in order to ensure compliance. A recipient may formally request an exemption from this requirement if it believes it fits within the exception described. Recipients have considerable flexibility in developing a Language Assistance Plan, or LEP Plan. An LEP Plan shall, at a minimum:

- (a) Include the results of the Four Factor Analysis, including a description of the LEP population(s) served;
- (b) Describe how the recipient provides language assistance services by language;
- (c) Describe how the recipient provides notice to LEP persons about the availability of language assistance;
- (d) Describe how the recipient monitors, evaluates and updates the language access plan; and
- (e) Describe how the recipient trains employees to provide timely and reasonable language assistance to LEP populations. FTA will solely determine, at the time the recipient submits its Title VI Program or subsequent to a complaint investigation or compliance review, whether a recipient's plan is sufficient to ensure meaningful access and thus ensure the recipient is not engaging in discrimination on the basis of national origin.

SAFE HARBOR PROVISION

DOT has adopted DOJ's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost. These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures. For example, a recipient may determine that a large number of persons in that language group have low

literacy skills in their native language and therefore require oral interpretation. In such cases, background documentation regarding the determination shall be provided to FTA in the Title VI Program.

REQUIREMENT TO COLLECT AND REPORT DEMOGRAPHIC DATA

In order to comply with the reporting requirements in 49 CFR Section 21.9(b), transit providers that operate 50 or more fixed route vehicles in peak service and are located in a UZA (Urbanized Area of 200,000 or more in population) shall collect and analyze racial and ethnic data as described below in order to determine the extent to which members of minority groups are beneficiaries of programs receiving Federal financial assistance from FTA. It is in compliance with such provision that LA Metro has contracted Community Connections, LLC to conduct the data collection and survey results with LEP Limited English Proficient beneficiaries, subject matter of the present report.

In order to ascertain the frequency with which LEP individuals come in contact with the program, the following tasks were undertaken:

An online LEP Customer Experience survey of Metro Transportation Operations Supervisors and Freeway Patrol Supervisors to determine the frequency of contacts with LEP individuals.

Focus Group (FG) sessions and/or individual interviews with LEP individuals.

Completion of a self-administered survey for all LEP individuals that participated in a FG session or an individual interview.

A review of each task follows.

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 as well as to a broad range of Metro Employees who interact with the public. The survey was designed to determine their frequency of contact with Limited English Proficiency (LEP) individuals. Metro distributed a link to the online survey and it was in the field from March 19, 2025 to April 14, 2025. A total of 226 responses were collected.

Survey Questions:

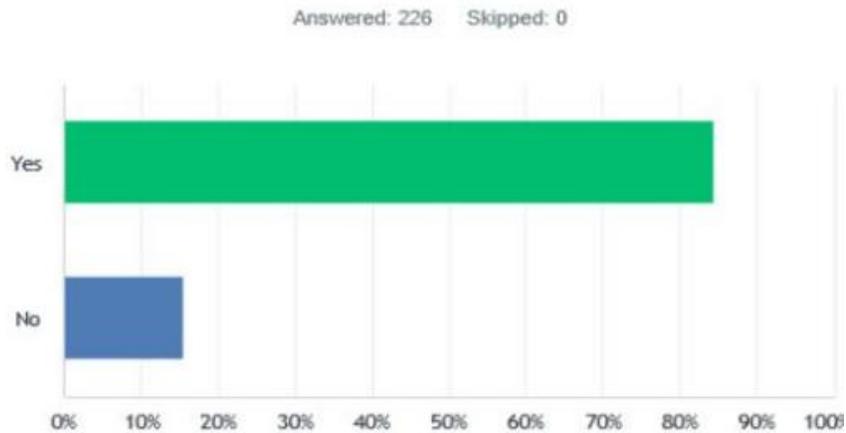
1. Do you regularly encounter Metro customers who have limited English proficiency (speaking or understanding English)?
2. In a TYPICAL DAY, approximately how many customers do you encounter?

3. Of these, approximately how many would you say are unable to communicate well in English?
4. How often do you TYPICALLY encounter Metro customers seeking assistance who are unable to communicate well in English?
5. What services or information are those limited English speaking Metro customers TYPICALLY seeking? (select all that apply)
6. Which of these languages do you recognize as being COMMONLY used by limited English speaking Metro customers you encounter? (select all that apply)
7. Which THREE languages are most of your limited English speaking Metro customers speaking? (select up to 3)
8. For which, if any, of these language groups, could Metro services be improved? (select all that apply)
9. In what specific ways would you suggest improving Metro services for limited English speaking Metro customers?
10. Can you speak well in any languages other than English?
11. What other languages can you speak well? (select all that apply)
12. In what specific area of greater Los Angeles do you work?
13. What is your job title? (optional)
14. In which of the following departments do you work?

2.2 Employee Survey Findings

Q1. Do you regularly encounter Metro customers who have limited English proficiency (speaking or understanding English)?

The great majority (85%) of respondents reported encountering customers with limited English proficiency.



ANSWER CHOICES	RESPONSES	
Yes	84.51%	191
No	15.49%	35
TOTAL		226

Q2. In a TYPICAL DAY, approximately how many customers do you encounter?

On a typical day, Metro staff encounter greatly differing numbers of customers, from as few as five to as many as 1,000. The data shows that **20% of staff encounter fewer than 10 customers daily**, while **31% interact with 10 to 50 customers**. A smaller portion, **9%, handle 51 to 100 customers**, and only a few experience encounters of 101 to 200 or even 201 to 300 customers. The occurrence of higher customer volumes, such as **301 to 1,000, is extremely rare**, with only a small percentage (**less than 2%**) encountering these numbers. It should be noted that **33% of respondents did not provide specific data**, leaving a significant portion of unaccounted responses.

	Choice	Response	Total 225
1	Less than 10	20.00%	45
2	10-50	31.11%	70
3	51-100	8.89%	20
4	101-200	3.11%	7
5	201-300	0.89%	2
6	301-400	0.89%	2
7	401-500	0.44%	1
8	501-600	0.00%	0
9	601-700	0.00%	0
10	701-800	0.00 %	0
11	801-900	0.00%	0
12	901-1000	0.89%	2
13	More than 1,000	0.42 %	1
14	Blank/No	33.33%	75

Q3. Of these, approximately how many would you say are unable to communicate well in English?

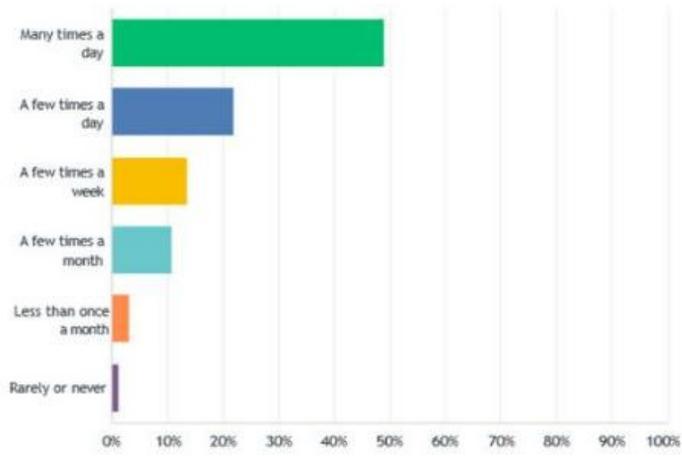
Of the 155 responses regarding customers who struggle with English communication, a **plurality (33%) reported encountering fewer than 10** such customers daily, while **29% indicated 10 to 50 customers**. A small portion, **4% deal with 51 to 100 customers** in this situation. Very few respondents reported higher volumes. About a third (31%) of respondents did not provide specific data.

	Choice	Response Percent	Response Total
1	Less than 10	32.89%	74
2	10-50	29.33%	66
3	51-100	3.56%	8
4	101-200	0.44%	1
5	201-300	0.44%	1
6	301-400	0.44%	1
7	401-500	0.44%	1
8	501-600	0.44%	1
9	601-700	0.00%	0
10	701-800	0.44%	1
11	801-900	0.44%	1
12	901-1000	0.00%	0
13	More than 1,000	0.00%	0
14	Blank/No	31.11%	70

Q4. How often do you TYPICALLY encounter Metro customers seeking assistance who are unable to communicate well in English?

The data from 155 responses indicates that the bulk of these interactions (**49%**) occur "**many times a day.**" A smaller proportion of responses, (**22%**) report **less frequent interactions**, occurring "a few times a day."

Answered: 155 Skipped: 71



ANSWER CHOICES	RESPONSES
Many times a day	49.03% 76
A few times a day	21.94% 34
A few times a week	13.55% 21
A few times a month	10.97% 17
Less than once a month	3.23% 5
Rarely or never	1.29% 2
TOTAL	155

Q5. What services or information are those limited English speaking Metro customers TYPICALLY seeking? (select all that apply)

Limited English-speaking Metro customers most commonly seek help with **routes and wayfinding, with 91%** of respondents indicating this need. This is followed by assistance with **schedules and fares, each reported by 59%** of respondents. Other frequently requested services include **information on service changes or detours (47%), crime/security issues (28%), complaints or commendations (27%) and bus conditions (21%)**. Less frequently, these customers seek help with ADA/accessibility concerns (14%), and public information like hearings and board meetings (11%). Services related to discrimination and accidents were cited less commonly, at 9% and 7% respectively.

Q5. Continued answers:

ANSWER CHOICES	RESPONSES	
None of the above/I don't know	2.00%	3
Routes/wayfinding	91.33%	137
Schedules	59.33%	89
Fares	59.33%	89
Complaints/commendations	26.67%	40
Crime/security	28.00%	42
Accidents	7.33%	11
ADA/accessibility for the disabled	14.00%	21
Discrimination	8.67%	13
Bus conditions (broken equipment, cleanliness, etc.)	21.33%	32
Public information (hearings, board meetings, etc.)	11.33%	17
Service changes/detours	46.67%	70
Other (please specify)	13.33%	20
Total Respondents: 150		

metro

customers TYPICALLY seeking? Please select all that apply.

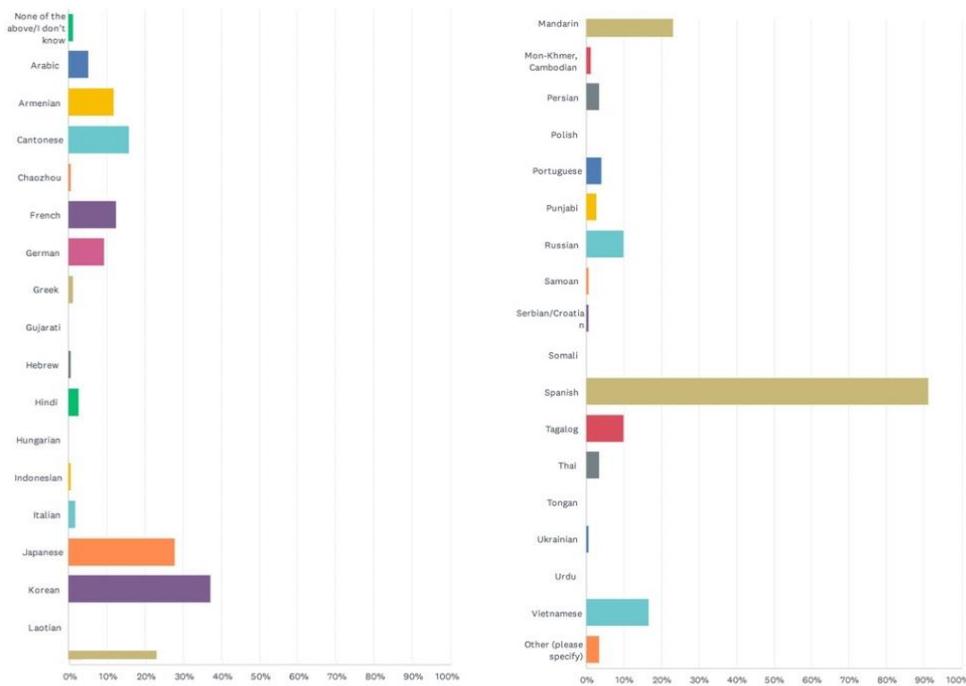
Answered: 150 Skipped: 76

#	OTHER (PLEASE SPECIFY)
1	Addresses
2	understanding how we provide information. they seem to always be repetitive and want to have confirmation at least 3 or more times.
3	What time the rail station closes and when is the next train.
4	Spanish
5	How to use tap machine
6	Mostly in spanish
7	Tap vending machines
8	TAP
9	Lost and found
10	Cleanliness, safety and regular service
11	With reloading tap card
12	Sometimes we are approached by spanish speaking customers who need help with metro apps/ personal apps on their phones. Tech Savy questions
13	Events
14	Citations
15	Pass ups or early trips
16	Rail Service Alerts
17	LIFE Program, Bus detours
18	Directions
19	Directions to specific locations
20	I solicit feedback on transit service and amenities



Q6. Which of these languages do you recognize as being COMMONLY used by limited English speaking Metro customers you encounter? (select all that apply)

Among the languages recognized as commonly used by limited English-speaking Metro customers, **Spanish** stands out as the most frequently encountered by **91%** of respondents.. **Korean** follows at **37%**, while **Japanese** is noted by **28%** of respondents. Other significant languages include **Mandarin (23%)**, **Vietnamese (17%)**, and **Cantonese (16%)**. Less frequently cited languages include **French (13%)** and **Armenian (12%)**, **Tagalog**, and **Russian (both at 10%)**. No other languages were reported above the 10% threshold.



ANSWER CHOICES	RESPONSES
None of the above/I don't know	1.33%
Arabic	5.33%
Armenian	12.00%
Cantonese	16.00%
Chaozhou	0.67%
French	12.67%
German	9.33%
Greek	1.33%
Gujarati	0.00%
Hebrew	0.67%
Hindi	2.67%
Hungarian	0.00%
Indonesian	0.67%
Italian	2.00%
Japanese	28.00%
Korean	37.33%

ANSWER CHOICES	RESPONSES
Laotian	0.00%
Mandarin	23.33%
Mon-Khmer, Cambodian	1.33%
Persian	3.33%
Polish	0.00%
Portuguese	4.00%
Punjabi	2.67%
Russian	10.00%
Samoan	0.67%
Serbian/Croatian	0.67%
Somali	0.00%
Spanish	91.33%
Tagalog	10.00%
Thai	3.33%
Tongan	0.00%
Ukrainian	0.67%
Urdu	0.00%
Vietnamese	16.67%
Other (please specify)	3.33%
Total Respondents: 150	

Q6 Continued Answers

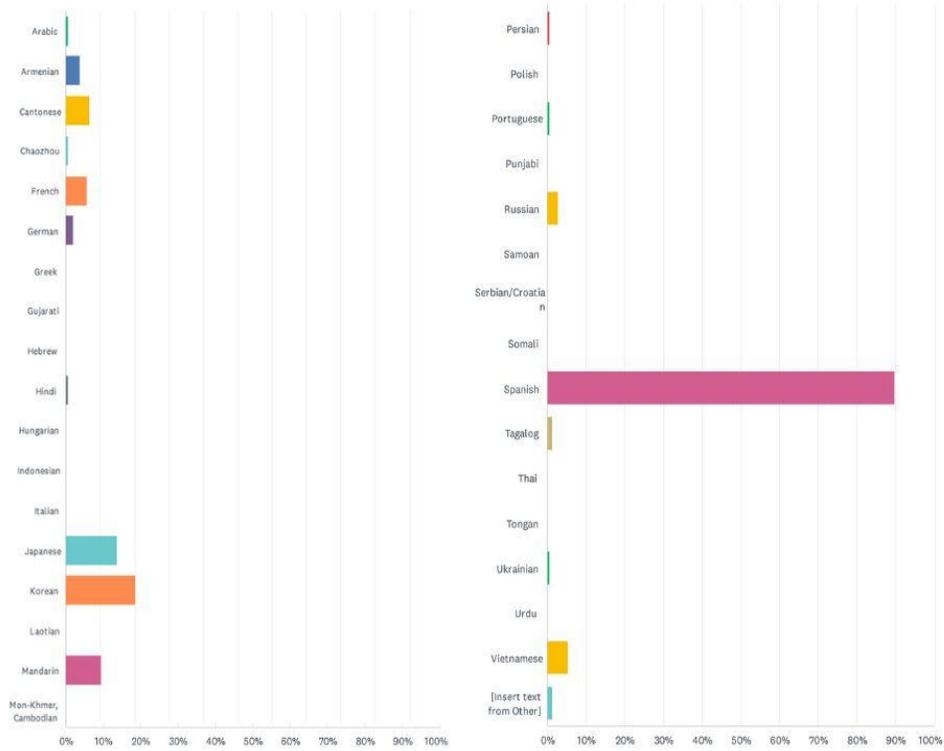
#	OTHER (PLEASE SPECIFY)
1	Chinese
2	Hello
3	No
4	Unspecified Asian Languages
5	ASL

Q7. Which THREE languages are most of your limited English speaking Metro customers speaking? (select up to 3)

According to the survey, the **three most commonly spoken languages** by limited English-speaking Metro customers are overwhelmingly **Spanish (90%)**, **Korean (20%)**, and **Japanese (15%)**. Other notable

mentions include **Mandarin** was mentioned by 10% of respondents. While other languages were noted, none cleared 10%.

Q7.



Q7.

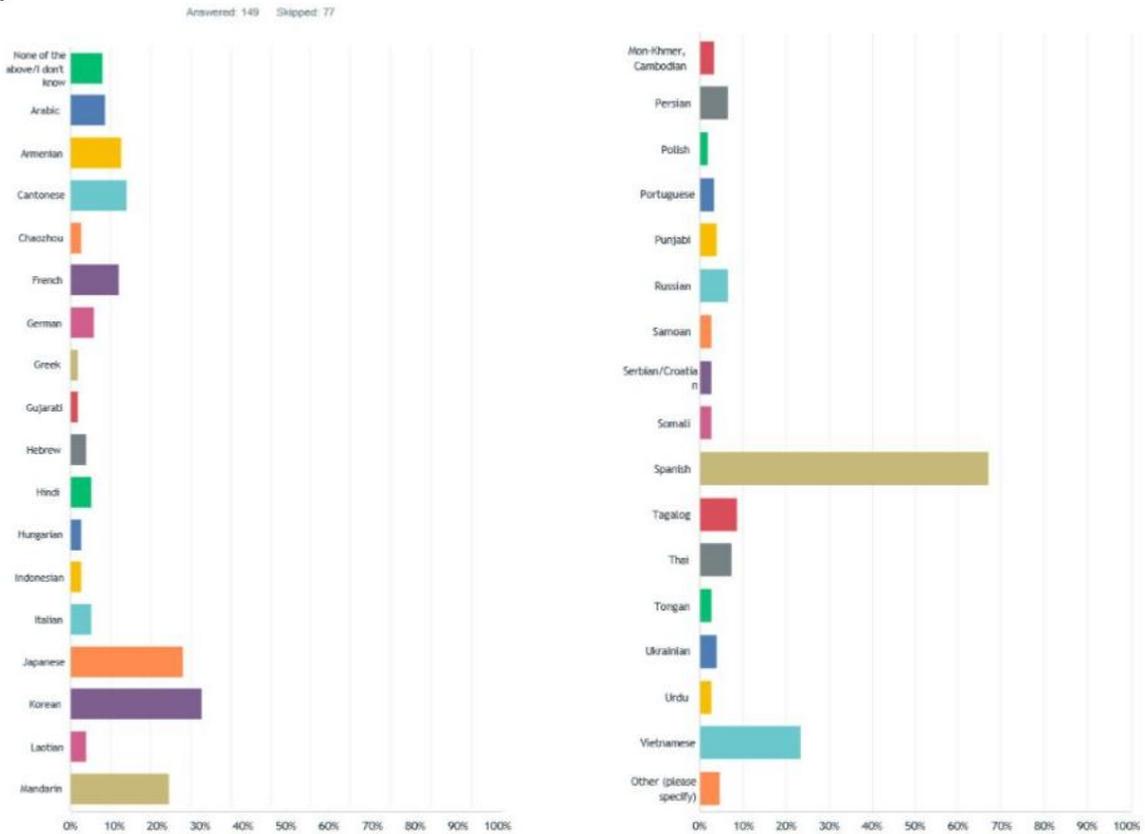
ANSWER CHOICES	RESPONSES	
Arabic	0.68%	1
Armenian	4.05%	6
Cantonese	6.76%	10
Chaozhou	0.68%	1
French	6.08%	9
German	2.03%	3
Greek	0.00%	0
Gujarati	0.00%	0
Hebrew	0.00%	0
Hindi	0.68%	1
Hungarian	0.00%	0
Indonesian	0.00%	0
Italian	0.00%	0
Japanese	14.86%	22
Korean	20.27%	30
Laotian	0.00%	0
Mandarin	10.14%	15
Mon-Khmer, Cambodian	0.00%	0
Persian	0.68%	1
Polish	0.00%	0

ANSWER CHOICES	RESPONSES	
Portuguese	0.68%	1
Punjabi	0.00%	0
Russian	2.70%	4
Samoan	0.00%	0
Serbian/Croatian	0.00%	0
Somali	0.00%	0
Spanish	89.86%	133
Tagalog	1.35%	2
Thai	0.00%	0
Tongan	0.00%	0
Ukrainian	0.68%	1
Urdu	0.00%	0
Vietnamese	5.41%	8
[Insert text from Other]	1.35%	2
Total Respondents: 148		

Q8. For which, if any, of these language groups, could Metro services be improved? (select all that apply)

Survey responses reveal a clear prioritization of language support needs for Metro services. Spanish emerged as the most critical area for improvement, identified by **67% of respondents**. The next most frequently mentioned languages were **Korean (33%), Japanese (28%), Mandarin (25%), and Vietnamese (23%)**. This feedback underscores a strong demand for enhanced multilingual resources, especially for these five most prevalent non-English languages utilized by Metro riders.

Q8.



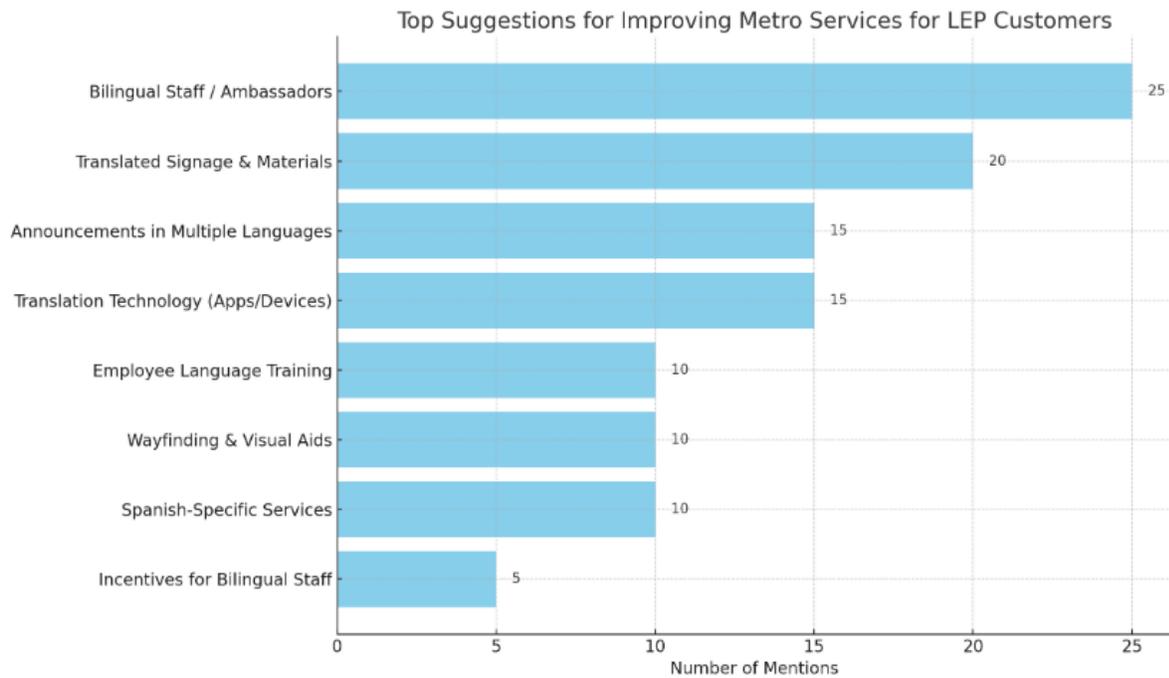
Q8.

ANSWER CHOICES	RESPONSES	
None of the above/ don't know	8.05%	12
Arabic	8.72%	13
Armenian	12.75%	19
Cantonese	14.09%	21
Chaozhou	2.68%	4
French	12.08%	18
German	6.04%	9
Greek	2.01%	3
Gujarati	2.01%	3
Hebrew	4.03%	6
Hindi	5.37%	8
Hungarian	2.68%	4
Indonesian	2.68%	4
Italian	5.37%	8
Japanese	28.19%	42
Korean	32.89%	49
Laotian	4.03%	6
Mandarin	24.83%	37
Mon-Khmer, Cambodian	3.36%	5
Persian	6.71%	10
Polish	2.01%	3
Portuguese	3.36%	5
Punjabi	4.03%	6
Russian	6.71%	10
Samoan	2.68%	4
Serbian/Croatian	2.68%	4
Somali	2.68%	4
Spanish	67.11%	100
Tagalog	8.72%	13
Thai	7.38%	11
Tongan	2.68%	4
Ukrainian	4.03%	6
Urdu	5.37%	8
Vietnamese	5.37%	8
Other (please specify)	4.70%	7
Total Respondents: 149		

#	OTHER (PLEASE SPECIFY)
1	African refugees
2	All
3	All
4	All of the above
5	ASL
6	we receive calls from a variety of tourist with different languages
7	all

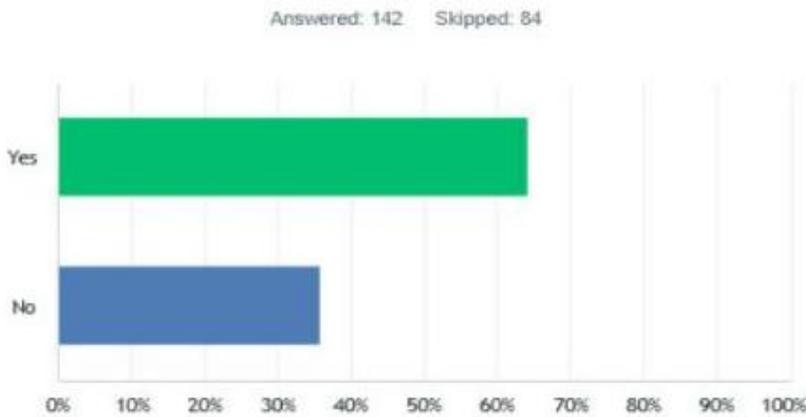
Q9. In what specific ways would you suggest improving Metro services for limited English-speaking Metro customers?

Open-ended survey feedback on improving Metro services for limited English-speaking customers strongly emphasizes the need for enhanced communication. The most prominent suggestions were **bilingual staff/ambassadors and translated signage & materials**, mentioned **by a total combined 45 respondents**. Other key themes included **improving information delivery through announcements and technology (apps/devices)**, each with **15 responses (30 combined)**, and addressing fundamental accessibility through **employee language training, wayfinding, and visual aids/Spanish-specific services**, each with **10 responses (30 combined)**. A smaller suggestion was to **incentivize bilingual staff (5 responses)**. Taken together, these responses underscore the critical importance of implementing clear, accessible, and multilingual communication tools across the Metro network.



Q10. Can you speak well in any languages other than English?

When asked if they can speak well in any language other than English, **64%** of Metro staff responded **"Yes"**, indicating multilingual capability. Meanwhile, **36%** said **"No"**, suggesting they are monolingual in English. It is worth noting that a significant portion—**59%**—did not provide a response. Overall, these results suggest that a notable segment of Metro staff can communicate in additional languages, which may help in assisting limited English-speaking customers.



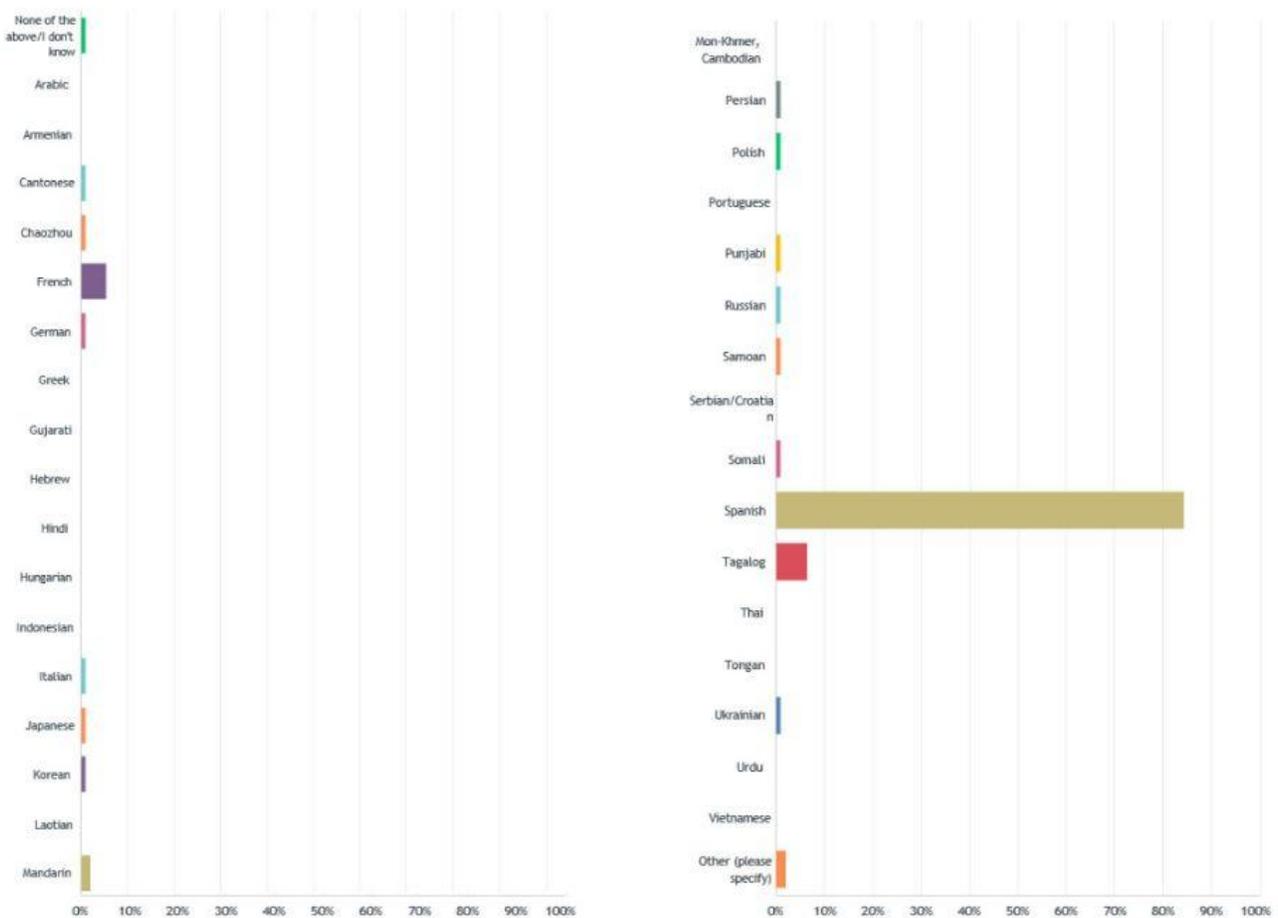
ANSWER CHOICES	RESPONSES
Yes	64.08% 91
No	35.92% 51
TOTAL	142

Q11. What other languages can you speak well? (select all that apply)

Among Metro staff who reported speaking additional languages besides English, **Spanish** was by far the most common, with **84%** indicating fluency. Other languages were mentioned much less frequently, including **Tagalog (7%)**, and **French (6%)**. Numerous other languages—including **Mandarin, Italian, Somali, Samoan, Russian, Punjabi, Polish, Persian, Japanese, Korean, German, Chaozhou,** and **Cantonese**—were each reported by a very small fraction of respondents. This distribution highlights a strong Spanish-language presence among bilingual staff but also points to opportunities to increase representation of other commonly spoken community languages.

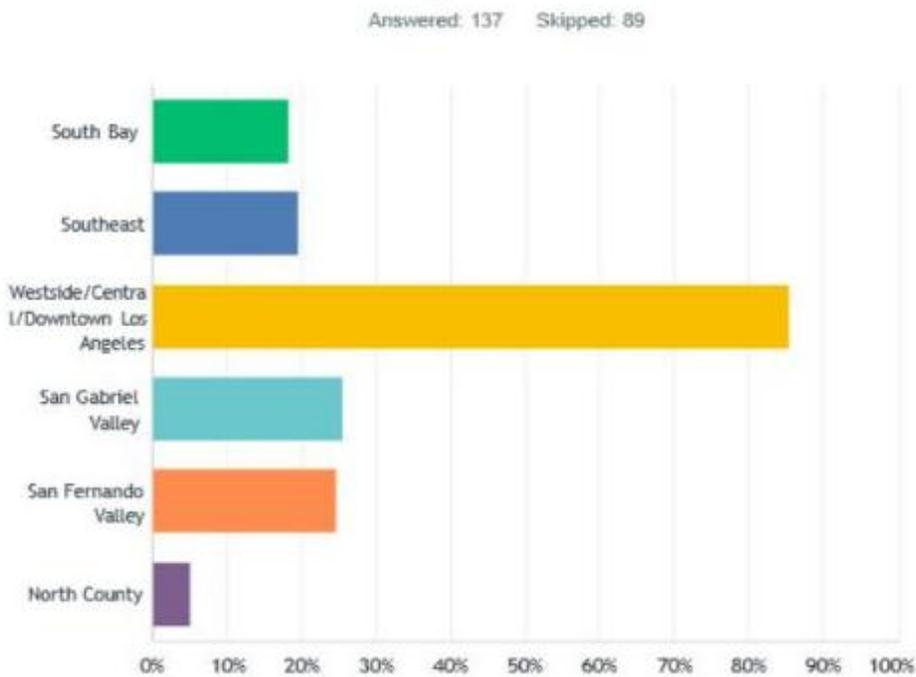
Q11.

Answered: 90 Skipped: 136



Q12. In what specific area of Greater Los Angeles do you work?

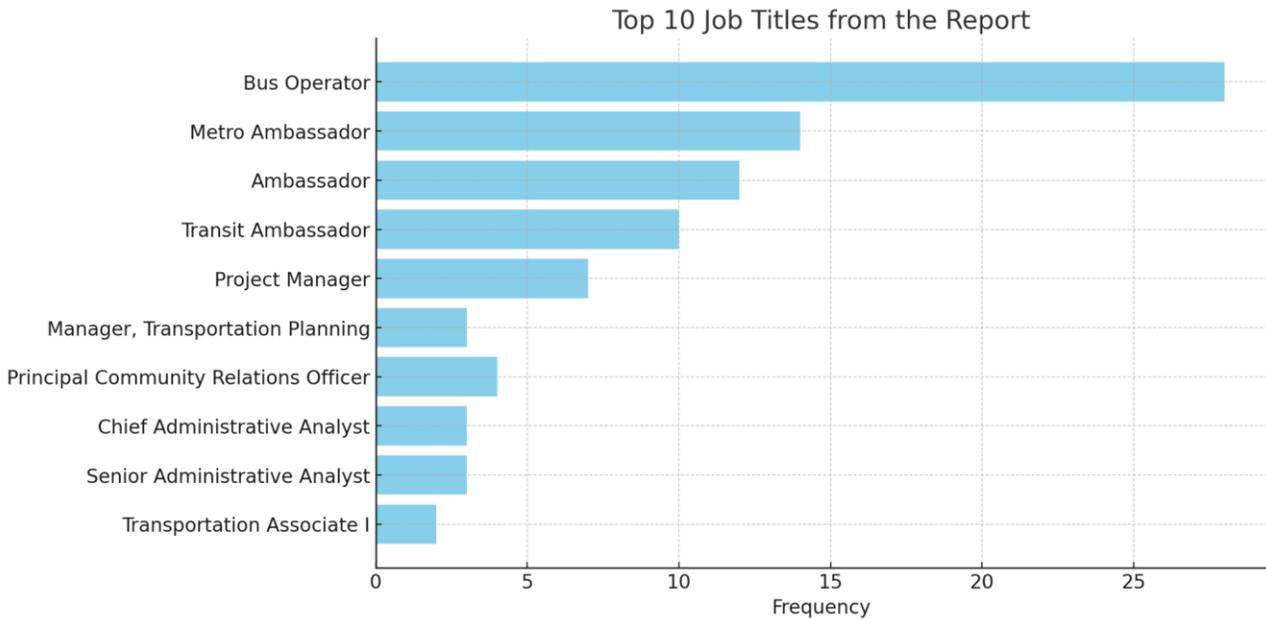
An analysis of 137 responses reveals that the most frequently reported work location for Metro staff is within Greater Los Angeles, with a significant **85% concentrated in the Westside/Central/Downtown Los Angeles** area. Other areas including the **San Gabriel Valley (26%)** and the **San Fernando Valley (25%)**. The **Southeast region (20%)** and **South Bay (18%)** also show notable representation, while **North County** accounts for the smallest portion at **5%**. This data underscores a widespread distribution of Metro staff across the metropolitan region, with a clear majority working in central urban centers.



ANSWER CHOICES	RESPONSES	
South Bay	18.25%	25
Southeast	19.71%	27
Westside/Central/Downtown Los Angeles	85.40%	117
San Gabriel Valley	25.55%	35
San Fernando Valley	24.82%	34
North County	5.11%	7
Total Respondents: 137		

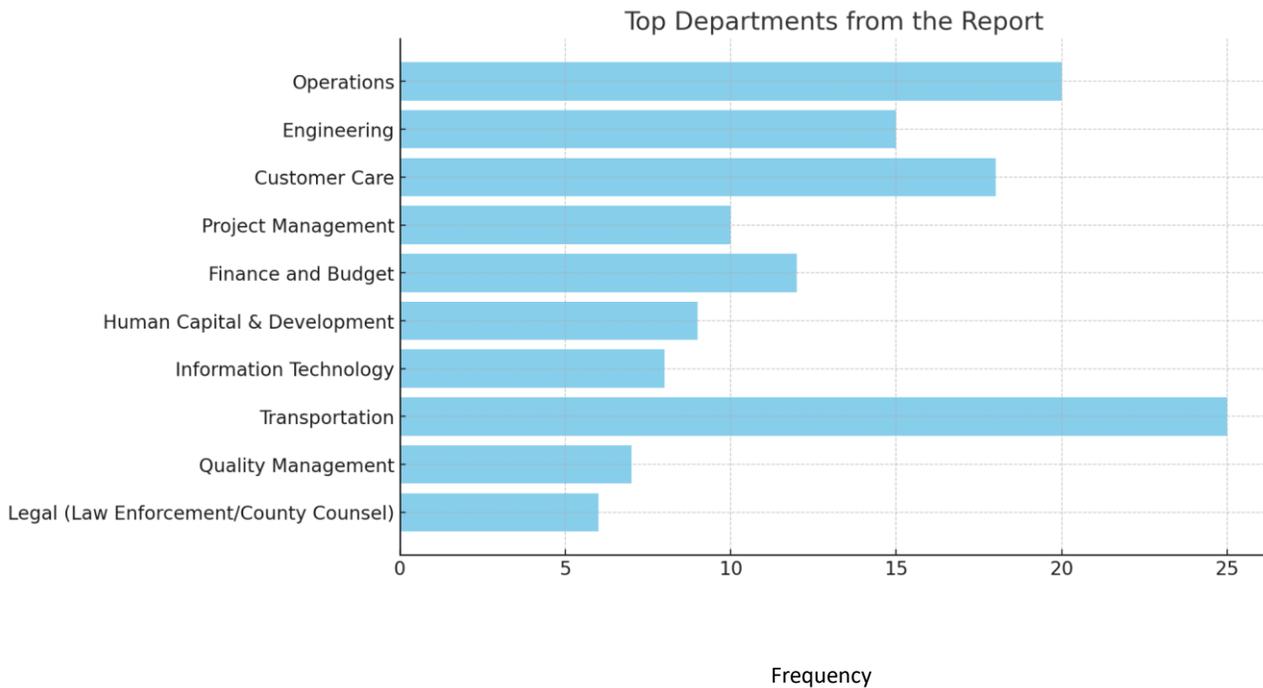
Q13. What is your job title? (optional)

Survey data on Metro staff job titles indicates that **Bus Operator** was the most prevalent role, representing approximately **29 responses**. Ambassador roles (including “Ambassador” and “Metro/Transit Ambassador”) were also prominent, totaling **about 23 responses**. Further representation included Project Managers, Administrators, and Principal Community Relations Officers, combining for **21 responses**. This distribution reflects a workforce actively engaged in direct service delivery and public interaction, particularly in roles essential for customer assistance, language support, and wayfinding.



Q14. In which of the following departments do you work?

Metro staff participating in the survey represented a diverse set of departments, with the largest group—**25 responses** working in **Transportation**. This was followed by **Operations**, which accounted for **20 responses**, highlighting a strong front-line presence in both transit operations and direct customer engagement. **Customer Care** followed at **17 responses**. Additional departments with notable representation included Engineering and Finance and budget with a combined response of 28 responses. Smaller proportions of staff reported working in areas such as Project Management and **Human Capital & Development 19 combined responses**. A smaller group in System **Security, Technology, Quality Management and Legal counsel/Enforcement 30 combined responses**. This distribution reflects a wide range of roles involved in supporting Metro’s mission to serve a linguistically diverse customer base.



2.3 LEP Individuals Self-Administered Survey

Approach

With the cooperation of community based organizations, 14 focus group discussions with LEP individuals were held, and one interview conducted over the phone. A self-administered survey was completed by all attendees with the exception of the telephone interview, which was completed via telephone by the facilitator. Facilitators gathered the surveys to collect the data for this report regarding Metro Usage, Metro Services used, and respondent Satisfaction with Metro. The original survey was translated into additional languages by the CBOs prior to each focus group session to enable ease of completion by respondents. The survey consisted of 18 open and closed-ended questions. An interpreter was present to assist respondents with further translation assistance in their language as needed.

The survey was administered after the facilitator discussion and/or the interview. They were conducted from March 7, 2025 through March 28, 2025.

A total of 145 people completed the survey with representation from 15 language groups in Los Angeles County.

Findings

LEP riders take an average of 31 one-way trips per month on Metro bus or rail. Survey respondents generally ride the bus more often than the rail.

# of One-Way Trips per Month	Total	Bus	Rail
N=	145	81	53
0	64%	49%	100%
1 – 3	29%	31%	32%
4 – 5	7%	4%	13%
6 – 10	17%	16%	23%
11 – 20	11%	15%	8%
21 – 50	13%	19%	8%
More than 50	10%	15%	4%
Mean	31.2	17.3	14.1

Approximately how many one-way trips do you take per month on Metro bus/rail?
 Base: Those who ride that mode of transportation.

Most LEP riders go shopping or run errands (41%) using Metro. High-usage riders are more likely to ride Metro to go shopping/run errands and to commute to home and work.

<i>Where Going</i>	<i>Total</i>	<i>Total</i>
	N=	145
Shopping/Errands		41%
Home		26%
Sports/Social Outings/Recreation		19%
Work		23%
School		10%
Other		10%
No answer		8%
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 (49%) and rail (31%). Top-2-box ratings are higher for the bus than the rail.

<i>Satisfaction</i>	<i>Total</i>
	N= 134
Metro Bus – top-2-box	49%
Metro Bus – mean score	2.10
Metro Rail – top-2-box	31%

Metro Rail – mean score	1.3
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 bus (54%) receiving higher top-2-box ratings than the rail (28%).

		Total
Easy/Difficult to Use		
	N=	134
Metro Bus – top-2-box		54%
Metro Bus – mean score		3.90
Metro Rail – top-2-box		28%
Metro Rail – mean score		1.0
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)		

A larger percentage (42%) do not feel their limited English is a barrier, and 12% did not answer the question. Less than one-quarter of LEP riders (21%) feel that their limited English skills contribute to the problems or difficulty they have with the Metro.

		Total
Limited English Source of Problem		
	N=	145
Yes		21%
No		42%
No answer		12%
Do you find that you have difficulty or problems using Metro because you speak a limited amount of English?		

Ticket Machine Instructions (27%) and Route Maps (25%) are the most difficult transit information to understand among LEP riders. Less than one-quarter surveyed also indicate Timetables (17%) and Station Announcements (16%) to be difficult to understand.

		Total
Transit Information Difficult to Understand		
	N=	145
Route Maps		25%
Ticket Machine Instructions		27%
Timetables		17%
Station Announcements		16%
Station Signs		16%
Other		3%
No answer		22%
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 (21%-18%) were the improvements of greatest interest to participants.

Changes to Improve Transit Experience	Total	Total
	N=	145
Signs, brochures and announcement in native language		21%
Picture signs		20%
Multilingual phone lines		19%
Translators		18%
Website supported by multilingual texts		11%

Other	6%
No answer	15%
All	7%
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 ranked at top mean score of 3 and above: bus signs, bus routes, bus fares, brochures on the bus, service changes, ticket office, and proposed service changes.

Importance of getting information from	
Metro in Native Language	
(Summary of Means)	<i>Total</i>
	N= 145
Bus routes (where buses go)	3.75
Bus fares (how much it costs)	3.74
Brochures on the bus	3.74
Proposed service changes	3.61
In the newspaper	2.97
On the television	3.13
On the radio	3.06
Brochures in the community	3.56
Service Changes	3.66
Signs on the bus	3.88
Metro ticket office	3.63
Signs at the bus stop	3.86
Metro website	3.51
Metro Telephone Center	3.57

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)

Russian focus Session 16 participants

Tagalog Focus Session-7 participants



Spanish Focus Session-29 participants

Persian Focus Session- 7 participants



A total of 15 languages were represented in this survey and 30 native languages were found.

Native Language	
	N=
	145
English	9%
Korean	3%
Persian	1%
Hindi	0%
Armenian	2%
Japanese	9%
Spanish	19%
Farci	1%
Bengali	1%
Khmer	7%
Chinese	5%
Cantonese	1%
Mandarin, Cantonese	1%
Punjabi, Hindi	1%
Hindi	1%
Marathi, Hindi	1%
Hindi, English	1%
Chinese, Mandarin	4%
Mandarin	1%
Farci, Persian	3%
Portuguese	1%
Russian	10%

Russian, Razaq	1%
Tagalog	3%
Tagalog, English	1%
Cubano, Tagalog	1%
English, Thai	1%
Vietnamese	1%
Cantonese, Mandarin, Vietnamese	1%
English, Spanish	1%
Vietnamese, English	1%
Blank	3%
	Total
	100%

What is your native language?

Base: Total

Over half of participants 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.

		Total
English Skills		
	N=	145
Read – top-2-box		57%
Read – mean score		3.6
Speak/Understand – top-2-box		58%
Speak/Understand – mean score		3.4
How well do you read/speak/understand English? (5-point scale, 5=very well, 1=not at all well)		

The demographic data of LEP respondents suggests a negative correlation between transit usage and access to personal vehicles and income. Lower Metro usage is associated with a higher likelihood of possessing a driver's license and having cars available. Higher Metro usage, however, is more strongly associated with lower annual household income (under \$15,000) and restricted vehicle access, with many having no car or only one car per household.

Demographics	Total	High Usage	Low Usage
	N=		145
Gender			
Male			28%
Female			64%
Left blank			8%
Age			
Under 25			1%
25 – 34			6%

35 – 44	6%
45 – 54	6%
55 – 64	16%
65 or older	46%
Left blank	14%

Have a Valid Driver's License Total=	126^
Yes	*50%
No	*37%
N/A	13%

of Cars Available in Household

None	32%
1	34%
2	18%
3 or more	6.2%
Left blank	4%

of People Living in Household

1	19%
2	50%
3	21%
4	9%
5 or more	17%
Left Blank	5%

Annual Household Income

Under \$15,000	36%
\$15,000 to \$24,999	13%
\$25,000 to \$49,999	17%
\$50,000 to \$74,999	10%
\$75,000 or more	16%
Left blank	8%

Japanese Focus Session-14 participants



Armenian Focus Session- 8 participants



2.7 Factor 2 Conclusions

It is clear from Metro's survey findings that there is a continuing need for a targeted outreach strategy to effectively disseminate information to the Limited English Proficient (LEP) community. A significant portion of Metro staff—59%—reported that LEP customers most commonly seek help with routes and wayfinding, followed closely by schedules and fares (39% each). These findings confirm that many LEP individuals are not fully informed about how to use the Metro bus and rail system and would likely use it more often if they had clearer, language-accessible guidance.

The data further highlights that Spanish is the most frequently encountered language among LEP customers (58% as one of the top three spoken languages, and 59% recognized as commonly used). However, other languages such as Korean, Japanese, Mandarin, and Vietnamese also represent significant portions of the LEP customer base. A significant proportion (43%) of respondents felt that Metro services could be improved for Spanish speakers, with lower but still notable percentages indicating a need for better support for other languages.

Survey responses underscore the need for printed materials in native languages, as many LEP individuals lack access to a smartphone, computer, or the internet, making digital-only resources insufficient. Although Metro has moved away from printed materials, the LEP community would clearly welcome their return. These materials could be distributed through trusted community-based organizations (CBOs), consulate offices, and senior housing facilities, which are already recognized by LEP individuals as reliable sources of information. Training CBO staff to provide Metro navigation assistance and organizing tours for first-time or infrequent users are practical, community-centered solutions that could increase ridership and build confidence.

Additionally, 33% of Metro staff speak Spanish, indicating that internal resources already exist to help bridge the communication gap, though coverage in other languages remains low. To enhance the riding experience, participants suggested more station announcements, route maps with visuals, and signage in native languages—each echoed in both the open-ended feedback and multiple choice questions.

Participants expressed overall satisfaction with Metro's service, even as they voiced concerns around safety, homeless people, and rude driver behavior. One standout comparison came from participants' high satisfaction with local gas and electric services, which received high ratings due to their consistently translated billing and website information. This comparison demonstrates a clear model for Metro to follow: consistent multilingual communication builds trust and accessibility.

The lack of language options on TAP card machines creates a critical barrier to access, especially for low-income, highly limited English speakers. Without the ability to pay or understand the fare system, many potential riders are excluded before they even board.

In summary, to better serve LEP communities, Metro should prioritize multilingual printed materials, expand its presence in trusted community venues, train CBO partners, improve signage and digital interfaces in multiple languages, and ensure fare systems are inclusive. These strategies not only address current barriers but also open pathways to equitable, informed public transit use for all.

Factor 3 Analysis: Access the Importance of Metro's Programs, Activities or Services

In order 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 with as many of the language groups in Los Angeles as possible, the project team reached out to community based organizations and churches with the top percentage of limited English proficiency language groups. Thirty-plus (30+) organizations were contacted via email, phone calls and leaving voice messages inviting them to participate in this research effort based on past or current relationships.

A total of 14 focus groups and one interview were organized representing 15 of Los Angeles' most Limited English Proficiency (LEP) language groups. The groups were held at various community based organization offices, community centers or ethnic restaurants in Los Angeles County. An interpreter was present at each discussion group, and was heavily relied on for the majority of the sessions, with the exception of the Hindi and Farsi sessions. It was decided to have the interpreter for each CBO translate the survey prior to the focus group sessions to make it easier on the participant.

Focus groups ranged in size from three to 29 participants, and took from 45 to 90 minutes to complete. 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 up to \$500 was made to each community-based organization that assisted us in this effort with an additional \$100 paid to the CBO for providing an in-house translator.

The engagement was successful in which we interviewed individuals from all 15 identified language groups, either in person or by telephone. All but three participants completed the survey. Across all focus group sessions and the individual interview, attendees expressed feeling valued and confident that their input would be shared with Metro for the DOT report. The majority wrote a response to the survey question, "What changes do you think should be done to improve your transit experience," with responses regarding safety, the unhoused, cleanliness, and providing bus routes printed in their language.

A total of 145 people were interviewed or participated in a focus group discussion translated in the languages listed:

Native Language	N=
Spanish	29
Russian	16
Armenian	8
Persian	7
Japanese	14
Korean	11
Tagalog	7
Vietnamese	3
Portuguese	1
Cantonese	11
Mandarin	7
Thai	5
Hindi	14
Bengali	2
Khmer (Cambodian)	10
Total	145

The focus groups were moderated by the four-person Community Connections team. To ensure comprehensive qualitative analysis, each facilitator employed a structured discussion guide designed to encourage insightful dialogue. The key areas explored during the focus group discussions included Metro usage patterns, perceptions of Metro Services, and overall satisfaction with the Metro system.

3.2 Summary of Qualitative Discussions and Interviews

Most of the LEP population attending focus groups consisted of seniors aged 55 and older, making up 61% of participants, and were predominantly female at 63%. This demographic likely has a higher prevalence of limited English skills. These seniors primarily rely on Metro bus transportation for essential travel, with their satisfaction rating at 49% and perceived ease of using the bus at 54%. While the overall mean for total bus and rail trips is 31.2 per month (N=145), qualitative data highlights the bus as the more critical mode of transport for seniors. In contrast, most male participants reported using rail more frequently to commute to work and engage in recreational activities.

LEP individual interviews revealed varied Metro usage by age. Younger individuals (<25), who are familiar with smartphones, utilized bus and rail more readily. The data also revealed age and car ownership diversity, as older households have zero cars at 32% and one car at 34%. This indicates a dependency on public transit.

A significant majority of LEP participants felt that Metro's outreach in their native languages was inadequate. However, the survey data revealed that 42% of participants did not believe their English proficiency contributed to their problems. The survey data suggests that 27% found the ticket machines difficult to understand, while 25% struggled with route maps and ticket machine signs at bus stops as well as signs on the bus. The qualitative data emphasizes the desire for translated informational literature (Mandarin, Cantonese, Cambodian, Russian, Armenian, Korean, and Japanese) to be delivered to community non-profits or made available through the Metro service/telephone center.

Participants reported difficulties with station and in-transit announcements due to hearing limitations or a lack of language accessibility. Reflecting the qualitative finding that LEP people take the bus more than rail, they reported an average of 31 bus trips per month compared to 17 rail trips. There was a strong desire for more bilingual bus drivers and visual aids or flyers.

The language groups with the most limited English skills included Thai, Cambodian, Cantonese, Mandarin, Vietnamese, Korean, and Russian speakers. Their language barrier contributed to reluctance to explore new locations due to fear of the homeless people on the bus, getting lost, safety, and confusion with routes/transfers. This aligns with 42% of LEP respondents stating "unsafe" as a reason for problems with transit.

Seniors without digital access preferred translated printed materials. This is supported by 21% suggesting signs/brochures/native language announcements as a change to improve transit.

The qualitative data strongly suggests that hiring bilingual staff and conducting enhanced outreach to the community, seniors, and cultural centers with translated materials are crucial. This is echoed by the 21% of all LEP respondents who felt their limited English contributed to problems using Metro, indicating a need for better language support.

Visual materials in native languages are essential for enhancing connectivity and boosting ridership by promoting comfort and alleviating anxiety. The survey data indicates that 20% request pictorial signs and 19% request multilingual phone lines as improvements.

The difficulties faced by some Cantonese-speaking participants with bus drivers, as reported, emphasize the potential for miscommunication due to language barriers. Community information meetings are needed to help bridge this communication gap.

3.3 Language Group Detail

The Community Connections team reached most of the top 15 languages spoken in Los Angeles County. We were unable to reach the Arabic language group who are in the top 10 due to the celebration of their Eid al-Fitr holiday after Ramadan. The Spanish Speaking community is the largest, with close to three and a half million members. Latinos are also the largest Metro ridership language group and we attracted 29 stakeholders to complete the survey at the Mexican Consulate office in the heart of Los Angeles. Participants resided in Downey, Downtown LA, Little Tokyo, Montebello, and Los Feliz. The San Fernando Valley has Russian and Farsi speaking populations and focus groups were conducted in Burbank and West Hollywood with participants residing in Glendale, Burbank, Reseda, Woodland Hills, Sherman Oaks and West Hollywood. The South Bay region was chosen to have a focus group with the Cambodian language group, attracting ten participants who reside in Long Beach. Mandarin and Cantonese language sessions for the Chinese community were conducted separately as well as those for Thai, Vietnamese, Korean, Bengali and Tagalog speakers. The Community Connections team chose distinct areas, DTLA-Chinatown, Koreatown, San Gabriel, Valley Village and Monterey Park in the San Gabriel Valley due to a heavy concentration of these language groups. The Hindi language group was conducted in Artesia for the high concentration of Hindi speakers who live in the surrounding areas of Artesia, Downey and Cerritos; however, the majority are not Metro users. Due to time constraints we conducted one interview in Portuguese.

Spanish Speaking Community

The Latino Restaurant Association (LRA) supports and promotes restaurateurs, small businesses and the entire Latino restaurant community to ensure equitable growth of the sector. The LRA community also engages with the Latino community in general to network and support other causes that advance the Latino community. The LRA scheduled a total of 29 participants with limited English proficiency, using the Mexican Consulate as the gathering site. An interpreter and translation was utilized for the Discussion Guide and survey. Attendees covered several LA areas, including Downey, Downtown LA, Little Tokyo, Montebello, Riverside, West Hollywood, and Los Feliz.



Metro Usage

Of the 29 individuals in the session, only one owns a car. All participants in the session (with the exception of the one who owns a car), use both bus and train during the week and weekend for purposes of work, school, shopping, and recreation. During the week, it is an everyday use for work. A couple of them use Uber/Lyft but not often. The individual who owns a car uses public transportation on a random basis.

Metro Services

All participants responded, "No" to the interaction with any other Metro Services. None of the participants have used other services outside of Metro nor have they interacted with other transportation agencies in LA County.

Satisfaction with Metro

Overall, participants are satisfied with Metro. They like that information is available in Spanish as it helps with understanding Metro signage and messaging. Some of the best experiences include frequency of schedule, especially during the week and trains that are clean. Some of the worst experiences include homeless individuals at bus stops and on transport that make trips feel unsafe as well as lack of cleanliness on some buses, trains, and transit stops. Participants feel that there can always be more done on safety and cleanliness. They also feel bathrooms should be available at stops.

Critical Public Services

All participants concluded that gas, electricity, trash pick-up, and mail service are equally important and that overall these services fall around a 4 in satisfaction on a scale of 1 to 5.

Korean Language Community

Temple Church of Christ Korean is an organization that serves the community through church services, social services, artistic, recreational, and educational programs. The organization scheduled a total of 11

participants with six participants that have extremely limited English proficiency seniors. Interpreter and translation was utilized for the Discussion Guide and survey.

Metro Usage

A total of seven individuals own cars and four ride the bus during the week and weekend for purposes of shopping, eating, and recreation in Downtown LA, San Gabriel, Rosemead, Downey and Walnut.

Metro Services

The majority of participants responded, "No" to interacting with any of Metro's Services. Some individuals had interaction with Metro ExpressLanes as well as the Metro tow trucks on the freeway.



Satisfaction with Metro

Primarily participants are somewhat satisfied except for problems with timetables, understanding bus schedules, routes and transfers and parking/pricing at bus stations; this was especially true for those that have limited English. The suggested improvements for ridership included safety as top concern, clarity regarding time tables, fares, bus schedules being more readily available in Korean, and additional bus frequency with routes, the last especially during periods in which special events cause road closures near downtown Los Angeles.

Hindi Language Community

GOPIO-Los Angeles is an organization that serves the community through social services, artistic, recreational, and educational programs. The organization scheduled a total of 15 participants with participants that have extremely limited English proficiency seniors. Interpreter and translation was utilized for the Discussion Guide and survey.

Metro Usage

A total of 13 individuals own cars; the minority use bus and train during the week and weekend for shopping, eating, and recreation in Long Beach, Cerritos, Artesia, Buena Park and Norwalk.

Metro Services

A majority of participants do not interact with any of Metro's Services. Some individuals had interaction with Metro tow trucks on the freeway as well as with another transportation agency; Metrolink. For this focus group session, a representative of Metro visited and spoke with the participants.

Satisfaction with Metro

The biggest concern for the participants was that they feel like Metro has never approached the community regarding new stations. One participant works at the City of Cerritos and he felt disconnected from Metro and their team on communications about station plans in the City of Cerritos. Generally participants are somewhat satisfied with Metro with the exception of problems with safety, cleanliness, timetables, understanding bus schedules, routes and transfers and parking/pricing at bus stations; difficulties with understanding were more prevalent for those with limited English proficiency. The suggested improvements for ridership included safety or “perception of safety” as top concern and cleanliness as a close second. Schedules more readily available in Hindi, and additional bus frequency with routes closer to home were also brought to our attention. This last point was pointed out as the importance of “the last mile”; or as the participant mentioned, “the last 0.5 mile.”



Russian Language Community

Jewish Family Service LA is an organization that serves the community through social services, artistic programs, recreational activities, and educational initiatives. The organization scheduled a total of 16 participants—16 seniors with limited English proficiency. An interpreter and translation services were utilized for the discussion guide and survey.

Metro Usage

Six participants own a car, but the majority rely on public transportation, primarily buses and trains, for weekly and weekend activities like shopping, work, and school in West Hollywood and Sherman Oaks. Of the participants, six use public transportation, with buses (9), trains (7), and Uber/Lyft (8) being the most common modes. Four individuals use public transportation daily. The main reasons for using public transportation include shopping (5), work (3), and school (3). Those who don't use public transportation

cited reasons such as owning a car, having no immediate need, concerns about cleanliness, the presence of homeless individuals, and safety.

Metro Services

The majority of participants reported that they have never interacted with Metro services aside from using the bus or train. When asked about specific interactions, none had used a Metro tow truck (Freeway Service Patrol), attended information meetings for any highway or transit construction projects, or been contacted about projects like the Metro Rail Extension to LAX or the Gold Line Foothill Extension. One participant noted having interacted with the DASH service, operated by another transportation agency (LADOT) in Los Angeles County.

Satisfaction with Metro

Participants felt that Metro has not sufficiently engaged with the community. While four were satisfied and six somewhat satisfied with public transportation, concerns were raised about bus frequency, cleanliness, and safety. Some suggested an express route that would be faster, cleaner, and more reliable, even at a higher cost. Issues like the lack of multilingual messages and ticket machines were also highlighted as challenges for those with limited English skills.

While most found Metro’s information useful, one participant reported difficulty understanding it. Suggestions for improvement included enhancing safety, cleanliness, and TAP card accessibility, as well as increasing bus frequency and making ticket machines multilingual. Better customer service and accessibility for non-English speakers were also recommended.

Participants rated trash pickup and gas services highly, with all ten rating trash pickup a “5.” Electricity ratings were mixed, while mail service received mostly high ratings. Overall, feedback emphasized the need for improvements in safety, accessibility, and language support.



Cantonese Speaking Community

The Chinatown Service Center is an organization that serves the Chinese immigrant community through social services, healthcare, financial planning, and youth programs. The organization scheduled a total of 11 participants with extremely limited English proficiency seniors and a few bilingual community members. Interpreters and translation were utilized for the Discussion Guide and survey. Participants were from several LA County areas including: Glendora, LA City, El Monte, and Pasadena.

Metro Usage

Of the 11 individuals in the session, three own a car. All those in the session (with exception of the ones that own a car), use both bus and train during the week and weekend for purposes of work, shopping, doctor appointments, social/leisure/recreation. During the week, it's an everyday use for all that was mentioned. The three that own a car don't see any immediate need to use public transportation. On occasion, one of the three individuals has used Uber/Lyft.

Metro Services

10 participants responded, "No" to having interacted with any of other Metro's Services. One participant has used the tow truck service. None of the participants have used other services outside of Metro nor have they interacted with other transportation agencies in LA County, nor contacted by anyone for a project. However, one participant mentioned she has on occasion been familiar with Metro projects because she has stopped at their booth displays when she is in the area.

Satisfaction with Metro

In general, participants who use public transportation are somewhat satisfied with Metro Services. Best experiences stem from drivers that are nice to them. Worst experiences stem from drivers that are rude and from sometimes feeling they are discriminated against because of their language barrier. Most



participants have encountered a hard time communicating with the drivers whenever they have questions. They have also experienced being ignored when they ring for a stop, being left at a different stop.

Participants would use Metro services more often if weekend schedules were improved, decreasing wait times between buses. They also think there should be coverage (i.e. roof/bus shelter) on all bus stops to protect against weather (extreme heat, cold or rain). This will be helpful for seniors. They mentioned that some Metro bus stops have been changed to DASH around Chinatown

and Downtown, and now there are less Metro bus stops and the distance between them is greater. This is difficult for seniors because they have to walk longer distances to reach the bus stops.

Participants also indicated that signs, announcements, and the Metro website do not include Cantonese or Mandarin. This makes it difficult for them to understand much of Metro communications in general. They would like Metro to include communications in Cantonese. They believe that continued focus on safety is a good thing.

Critical Public Services

Overall, all services are considered important. Satisfaction of services for each item on a scale of 1-5, 5 being best follows:

- a. Gas- A: 3 (why? not everyone has this service, many use electricity only)
- b. Electricity- A: 2 (why? too expensive)
- c. Trash pickup- A: 4 (why? there are too many categories to separate trash)
- d. Mail service-A: 5 (why? no complains, they work hard)

3.4 Factor 3 Conclusions

It is crucial for Metro to implement a robust outreach plan specifically designed to disseminate information to the Limited English Proficient (LEP) community, ensuring they are well-informed about the bus and rail system. Focus group attendees overwhelmingly indicated a willingness to increase their ridership or become new riders if provided with clear education on bus and rail routes. Since many LEP individuals lack personal vehicles, computers, or smartphones due to income constraints, the provision of printed Metro bus routes in their native languages is highly desired, especially given the perceived discontinuation of printed materials.

Significantly, LEP individuals often rely on local community service organizations, consulate offices, and senior housing facilities within their residential areas as key information hubs. These locations represent ideal venues for Metro to distribute informational literature in various languages and to host informative meetings facilitated by community outreach workers. Providing training to staff members at these community-based organizations on bus and rail routes would empower them to assist LEP individuals, thereby reducing their apprehension towards using Metro services. Furthermore, organizing guided tours of the bus and rail system, in partnership with these organizations, specifically for first-time and infrequent users, holds significant potential to increase ridership.

To enhance the riding experience for LEP individuals, clear station announcements and route maps incorporating picture signs in their native languages are essential. While the majority of participants expressed overall satisfaction with Metro, persistent concerns regarding safety, the presence of homeless individuals at bus stops, perceived rudeness from bus drivers, the inability to access information in their native languages, and the fear of navigating to unfamiliar locations remain significant barriers to increased ridership.

Interestingly, the vast majority of participants reported "extremely satisfied" ratings (a 5) for gas and electric services, attributing this to the receipt of information in their native languages with their monthly statements and the user-friendly, multilingual accessibility of the utility websites. This starkly contrasts with the challenges faced by extremely limited English proficient, low-income individuals who lack internet access at home. Their only potential access points are often community-based organization computers (if available with printing capabilities) or public libraries. The lack of translated options on tap

card machines also presents a significant obstacle, hindering their ability to pay for fares and thus preventing them from becoming regular Metro riders.

Appendix

LA Metro
LEP Focus Group
Discussion Guide April 2025

a. Introduction:

- Thank you for participating.
- Explain purpose of the interview – to learn how they use Metro and how it could be made easier for non-English speaking riders.
- No right or wrong answers, just want honest opinions.
- Please introduce yourself.

b. Metro Usage

- Do you own a car? Yes No
- Do you use public transportation? Yes No
- What kinds of public transportation do you use? (bus, train, etc.)

- How often do you use public transportation?

- For what purposes do you use public transportation? (work, shopping, etc.)

- IF DON'T USE PUBLIC TRANSPORTATION: Why not?

c. Metro Services

- Have you interacted with Metro other than on a bus or train? In what ways?

▪ IF NO ANSWER, PROBE:

◆ Have you used a tow truck on the freeway, AKA Freeway Service Patrol? If yes, how was that experience?

◆ Have you been to an information meeting for a highway or transit construction project (like Next Gen Project or Our Next LA Project) If yes, how was that experience?

◆ Have you been contacted about a transit project? (like the Westside Subway Extension or the Metro Rail Extension to LAX or the Gold Line Foothill Extension) If yes, how was that experience?

◆ Have you interacted with any other transportation agency in Los Angeles County? If yes, how was that experience?

Satisfaction with Metro

(FOR THOSE THAT DO NOT USE PUBLIC TRANSPORTATION, WE ASKED THEM TO REFERENCE THE EXPERIENCES THEY MAY KNOW OF THEIR FAMILY OR FRIENDS)

▪ How satisfied are you with public transportation in your area? Why?

▪ What are the best parts of Los Angeles public transportation? Worst parts?

▪ Would you ride public transportation more if something were different? What?

-
-
- What problems have you encountered with Metro that you feel are specific to those with limited English skills?

-
-
- Are these problems that you face in other parts of life or are they specific to public transportation?

-
-
- Do you find the information put out by Metro to be useful?

-
-
- Do you have any trouble understanding information put out by Metro?

-
-
- What suggestions do you have to improve public transportation and Metro to make it easier or better for you?

-
-
- Do you have any further comments for the people who run Metro?
-

j. On a scale of 1 to 5 please rate the importance of other critical public services. Very dissatisfied 1 and Very Satisfied 5.

1. Gas 2. Electricity 3. Trash Pickup 4. Mail Service

▪ Thank you very much for your time in representing your native language. Your comments are valued and appreciated and will be reported to Metro.

LA Metro – LEP Survey

Thank you for taking the time to complete this brief survey. Your input will help Metro assess the needs of people who speak another language.

1. Approximately how many one-way trips do you take per month on each of the following modes of public transportation?

Metro Bus _____ trips Metro Rail _____ trips (IF ZERO FOR BOTH, SKIP TO QUESTION 10)

2. Please tell us where you are going when you are using public transportation. Please check all that apply.

₀₁ Home ₀₂ School ₀₃ Work ₀₄ Shopping/errands

₀₅ Sports/social outings/recreation ₉₈ Other (please specify)

3. Using a scale of 1 to 5, please rate how satisfied you are with the public transportation you use.

	<i>Very</i>				<i>Very</i>
		<i>Satisfied</i>			<u><i>Dissatisfied</i></u>
<hr/>					
a. Metro Bus	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂	<input type="checkbox"/> ₃	<input type="checkbox"/> ₄	<input type="checkbox"/> ₅
c. Metro Rail	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂	<input type="checkbox"/> ₃	<input type="checkbox"/> ₄	<input type="checkbox"/> ₅

4. Using a scale of 1 to 5, please rate how difficult you find it to use the different public transportation.

	<i>Very</i>				<i>Very</i>
		<i>Easy</i>			<u><i>Difficult</i></u>
<hr/>					
a. Metro Bus	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂	<input type="checkbox"/> ₃	<input type="checkbox"/> ₄	<input type="checkbox"/> ₅
c. Metro Rail	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂	<input type="checkbox"/> ₃	<input type="checkbox"/> ₄	<input type="checkbox"/> ₅

5. Do you find that you have difficulty or problems using Metro because you speak a limited amount of English?

Yes ₁ CONTINUE TO QUESTION 6
QUESTION 7

No ₂ SKIP TO

6. What kinds of difficulty or problems do you encounter?

7. Which, if any, of the following transit information do you have trouble understanding?

Route maps

₀₁

Station signs

₀₅

Timetables

₀₂

Other

₉₈

Station announcements

₀₃

(please specify) _____

Ticket machine instructions

₀₄

8. What changes do you think should be done to improve your transit experience?

₀₁ Signs, brochures and announcements in your native language

₀₂ Picture signs

₀₃ Translators

₀₄ Multilingual phone lines

₀₅ Website supported by multilingual texts

₉₈ Other (please specify) _____

9. 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.

		<i>Very</i>			<i>Not at all</i>	
		<i>Important</i>	<hr/>			<i>Important</i>
a.	Bus fares (how much it costs)	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂	<input type="checkbox"/> ₃	<input type="checkbox"/> ₄	<input type="checkbox"/> ₅
b.	Bus routes (where buses go)	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂	<input type="checkbox"/> ₃	<input type="checkbox"/> ₄	<input type="checkbox"/> ₅
c.	Service changes	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂	<input type="checkbox"/> ₃	<input type="checkbox"/> ₄	<input type="checkbox"/> ₅
d.	Proposed service changes	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂	<input type="checkbox"/> ₃	<input type="checkbox"/> ₄	<input type="checkbox"/> ₅
e.	Metro website	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂	<input type="checkbox"/> ₃	<input type="checkbox"/> ₄	<input type="checkbox"/> ₅
f.	Metro telephone center <input type="checkbox"/> ₁	<input type="checkbox"/> ₂	<input type="checkbox"/> ₃	<input type="checkbox"/> ₄	<input type="checkbox"/> ₅	
g.	Metro ticket office	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂	<input type="checkbox"/> ₃	<input type="checkbox"/> ₄	<input type="checkbox"/> ₅
h.	Signs at the bus stop	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂	<input type="checkbox"/> ₃	<input type="checkbox"/> ₄	<input type="checkbox"/> ₅
i.	Signs on the bus	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂	<input type="checkbox"/> ₃	<input type="checkbox"/> ₄	<input type="checkbox"/> ₅
j.	Brochures on the bus	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂	<input type="checkbox"/> ₃	<input type="checkbox"/> ₄	<input type="checkbox"/> ₅
k.	Brochures in the community	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂	<input type="checkbox"/> ₃	<input type="checkbox"/> ₄	<input type="checkbox"/> ₅
l.	On the radio	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂	<input type="checkbox"/> ₃	<input type="checkbox"/> ₄	<input type="checkbox"/> ₅
m.	On the television	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂	<input type="checkbox"/> ₃	<input type="checkbox"/> ₄	<input type="checkbox"/> ₅
n.	In the newspaper	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂	<input type="checkbox"/> ₃	<input type="checkbox"/> ₄	<input type="checkbox"/> ₅

10. What is your native language? _____

11. How well do you read English?

		<i>Very</i>			<i>Not at all</i>	
		<i>Well</i>	<hr/>			<i>Well</i>
	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂	<input type="checkbox"/> ₃	<input type="checkbox"/> ₄	<input type="checkbox"/> ₅	

12. How well do you speak and understand English?

Not at all

Very

Well

Well

1

2

3

4

5

13. Gender:

₁ Male ₂ Female

14. What year were you born? _____

15. Do you have a valid driver's license?

₁ Yes ₂ No

16. How many cars are available to your household? _____ cars

17. How many people currently live in your household? _____ people

18. Total household income per year:

₁ Under \$15,000 ₄ \$50,000 - \$74,999
₂ \$15,000 - \$24,999 ₅ \$75,000 or more
₃ \$25,000 - \$49,999

Metro Limited English Proficiency (LEP) Survey

Thank you for participating. Your feedback supports Metro's Title VI compliance.

1. Do you regularly encounter Metro customers with limited English proficiency (LEP)?

- Yes
- No

2. On a typical day, how many Metro customers do you encounter?

3. Of these, how many cannot communicate well in English?

4. How often do you typically encounter LEP customers seeking assistance?

- Many times a day
- A few times a day
- A few times a week
- A few times a month
- Less than once a month
- Rarely or never

5. What services/information are LEP customers typically seeking? (Select all that apply)

- Routes/wayfinding
- Schedules
- Fares
- Complaints/commendations

- Crime/security
- Accidents
- ADA/accessibility
- Discrimination
- Bus conditions
- Public info
- Service changes/detours
- Other (specify): _____
- None/I don't know

6. Which languages are commonly used by LEP customers you encounter? (Select all that apply)

- Arabic
- Armenian
- Cantonese
- Chaozhou
- French
- German
- Greek
- Gujarati
- Hebrew
- Hindi
- Hungarian
- Indonesian

- Italian
- Japanese
- Korean
- Laotian
- Mandarin
- Mon-Khmer/Cambodian
- Persian
- Polish
- Portuguese
- Punjabi
- Russian
- Samoan
- Serbian/Croatian
- Somali
- Spanish
- Tagalog
- Thai
- Tongan
- Ukrainian
- Urdu
- Vietnamese
- Other (specify): _____
- None/I don't know

7. Which THREE languages are most common among LEP customers? (Select up to three)

- Arabic
- Armenian
- Cantonese
- Chaozhou
- French
- German
- Greek
- Gujarati
- Hebrew
- Hindi
- Hungarian
- Indonesian
- Italian
- Japanese
- Korean
- Laotian
- Mandarin
- Mon-Khmer/Cambodian
- Persian
- Polish
- Portuguese

- Punjabi
- Russian
- Samoan
- Serbian/Croatian
- Somali
- Spanish
- Tagalog
- Thai
- Tongan
- Ukrainian
- Urdu
- Vietnamese
- Other (specify): _____
- None/I don't know

8. For which language groups could Metro services improve? (Select all that apply)

- Arabic
- Armenian
- Cantonese
- Chaozhou
- French
- German
- Greek

- Gujarati
- Hebrew
- Hindi
- Hungarian
- Indonesian
- Italian
- Japanese
- Korean
- Laotian
- Mandarin
- Mon-Khmer/Cambodian
- Persian
- Polish
- Portuguese
- Punjabi
- Russian
- Samoan
- Serbian/Croatian
- Somali
- Spanish
- Tagalog
- Thai
- Tongan

- Ukrainian
- Urdu
- Vietnamese
- Other (specify): _____
- None/I don't know

9. In what specific ways would you suggest improving Metro services for LEP customers?

10. Can you speak any language well other than English?

- Yes
- No

11. If yes, which language(s) can you speak well? (Select all that apply)

- Arabic
- Armenian
- Cantonese
- Chaozhou
- French
- German
- Greek
- Gujarati
- Hebrew

- Hindi
- Hungarian
- Indonesian
- Italian
- Japanese
- Korean
- Laotian
- Mandarin
- Mon-Khmer/Cambodian
- Persian
- Polish
- Portuguese
- Punjabi
- Russian
- Samoan
- Serbian/Croatian
- Somali
- Spanish
- Tagalog
- Thai
- Tongan
- Ukrainian
- Urdu

- Vietnamese
- Other (specify): _____
- None/I don't know

12. In which areas of Greater Los Angeles do you work? (Select all that apply)

- South Bay
- Southeast
- Westside/Central/Downtown LA
- San Gabriel Valley
- San Fernando Valley
- North County

Optional Questions:

13. What is your job title?

14. In which department do you work?

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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.

Metro communications staff revisited current customer information materials and programs. This review 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 determine how information can best be made 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 along with the channels through which they are made available. This chart applies to all the information Metro provides to customers and stakeholders, including additional language materials currently offered.

Table 9: Types of Information Distributed via Available Channels

Types of Information Distributed via Available Channels	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	X
TPIS				X	X					
TVMs			X							

6. Language Access Plan

Metro's practice has been to provide the following language access 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,
- > 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,
- > Website landing pages with basic rider information and civil rights complaint forms in Spanish, Chinese, Korean, Armenian, Vietnamese, Japanese, Russian
- > Planning information translated to appropriate languages for projects in areas with concentrated LEP communities and by request – in print and online
- > Telephone language 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 the 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 language assistance offered since the last update of this plan, including usage of live telephone interpretation 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.
- > The analysis then 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 LEP DOT guidelines to develop Metro's Language Translation Threshold and a plan for providing specific documents and resources is outlined.

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 make up

16.2% of Metro’s total stakeholders – far greater than any other language group. The next two largest groups of LEP stakeholders, Chinese (including Mandarin and Cantonese) and Korean, account for 2.47% and 1.02% respectively, of Metro’s total stakeholders.

In support of the results above, Metro employees disclosed in Factor 2, that Spanish (91%) ranks highly as being one of the top three most spoken languages by LEP individuals, followed by Korean (37%), and Japanese (27%). Other top languages noted include Mandarin (23%), Vietnamese (17%) and Cantonese (16%).

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 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. ¹

As updated data on language groups and population becomes available, Metro will reassess this threshold as needed and make reasonable adjustments to accommodate LEP persons within available resources. In addition to Spanish, Metro looked at the size of language groups described in Factor 2, as well as historical record of how much language assistance 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 their language. The following languages are to be included when providing translated information when doing so can be reasonably accommodated within currently available resources:

LEP Groups

Spanish

Chinese ²

Korean

Armenian

Vietnamese

Japanese

Russian

LEP Access Needs

Needs Related to Information Types/Channels

¹ Tier categories are described in the next section under vital documents and Table 10.

² Because Cantonese and Mandarin are similar in written form, they will be combined in assessments of language groups for the purpose of translating and printing materials.

In Factor 2, 42% of LEP riders reported that they did not feel that their limited English skills were a barrier. However, the riders surveyed recommended improvements such as signs, brochures and announcements translated in their native language, use of pictures, and multiple languages for phone assistance, and website translation. The highest ranked information for LEP riders to receive in their native language was bus signs, bus routes, bus fares, brochures on the bus, service changes, ticket office, and proposed service changes. Additional survey responses revealed that many LEP individuals lack access to a smartphone, computer, or the internet, making digital-only resources insufficient.

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 telephone 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 picture/numeral flash cards for LEP patrons upon request.
- > Availability of translations in languages included in the Safe Harbor provision upon request. These languages are always available via live telephone interpreters on the main Metro Customer information line.

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

Table 10 summarizes the types of information categorized in the three tiers of information described above.

Table 10: Types of Information by Vital Document Tier

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

Verbal/Oral LEP Assistance

Metro is cognizant that providing meaningful and effective LEP assistance to our customers involves more than just translating written materials. However, unlike the requests for translations, Metro may not always be able to accurately assess the specific needs or urgency of the needs of our LEP customers when they make a request for verbal assistance made by LEP customers. When Metro staff encounter LEP speaking customers, they will provide verbal assistance 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 which handles up to 250 languages. Figure 6 shows the Language Assistance Card provided to staff and customers.

Figure 6.

<p>For Metro information in English, please call 323.466.3876 x1.</p>	<p>VIETNAMESE Để biết thông tin về Metro bằng tiếng Việt, vui lòng gọi số điện thoại dưới đây 323.466.3876 x5.</p>
<p>SPANISH <i>Para más información sobre Metro en español, por favor llame al 323.466.3876 x2.</i></p>	<p>JAPANESE Metro に関する日本語での情報は、の電話番号でお問い合わせください 323.466.3876 x6.</p>
<p>CHINESE 若需洛杉磯大都會交通局 Metro 的中文資料, 請聯絡以下電話號碼 323.466.3876 x3.</p>	<p>RUSSIAN Для получения информации о Metro на русском языке, пожалуйста, позвоните по указанному ниже номеру телефон 323.466.3876 x7.</p>
<p>KOREAN 메트로 Metro 정보를한국어로 알아보시려면, 아래 번호로 전화하십시오 323.466.3876 x4.</p>	<p>ARMENIAN Մետրոյի մասին հայերեն լեզվով տեղեկություններ ստանալու համար, խնդրում ենք զանգահարել այս հեռախոսահամարով՝ 323.466.3876 x8.</p>
	<p>For all other languages, please call 323.466.3876 x11.</p>

Language Assistance Measures

These steps summarize the process to provide LEP access based on findings outlined above. Metro will budget for critical items as needed in future years’ budgets.

- > Translate in Spanish nearly all printed materials, on-board information and station announcements, where practicable, with exceptions for maps and non-essential promotional information.
- > Use 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 languages, as resources allow.
- > Maintain and update as needed the multilingual section of Metro’s website including the ‘How to Ride’ information links to maps and timetables in the seven most prevalent languages that includes ‘How to Ride’ information and links to maps and timetables.
- > Provide multilingual access to telephone assistance for customers calling Metro.
- > Use multi-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, the costs associated with translating, printing and translated 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.

- > Like 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 to providing bilingual rail announcements is that 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). To provide customer service for the large Spanish speaking LEP riders 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 11 summarizing the 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 the 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. Materials available in specific languages are found in *Table 11*.

TABLE 11: Language Materials

Type of Information	Languages	Status
Notice of Civil Rights	Spanish Korean Chinese Japanese Khmer Thai	<i>Currently available.</i>
Brochure with Information on Available Language Assistance	Spanish Korean Chinese Japanese Khmer Thai	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	Spanish Korean Chinese Japanese Khmer Thai	Currently available in nine more languages;
“How to Ride” sections of the website with links to routes maps and timetables	Spanish Korean Chinese Japanese Khmer Thai	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	Spanish Korean Chinese Japanese Khmer Thai	Currently available
As resources allow: Additional Tier 1 information particularly on the website	Spanish Korean Chinese Japanese Armenian Russian Vietnamese	Ongoing
Displays with “How to Ride” and fare information installed in select Metro Rail stations	Spanish Korean Chinese Japanese	Currently installed

Tier 1 and Tier 2 printed information as space allows, with the exception of maps and select promotional information.	Spanish	Currently available
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Notification of Resource Availability

Metro will undertake the following activities to help notify LEP passengers about available translated resources:

- > Adding recordings to the phone tree that customers hear upon dialing into Metro’s main customer service information phone number
- > Notifying LEP riders of translated resources in advertisements currently running in available in-language news publications
- > Informing LEP riders 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:

- (1) 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.
- (2) In-language Customer Surveys: Approximately twice a year, Metro will conduct in-language surveys to collect feedback on all riders’ experiences and preferences. 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.
- (3) 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.

To ensure that Metro complies with the Limited English Policy under Title VI of the Civil Rights Act of 1964, Metro commenced 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 ensure compliance with the Language Assistance Program of Metro as mandated by the Title VI and DOT LEP guidelines. This will include evaluating Metro’s bus services, contracted bus services and other frontline employees having direct contact with LEP customers.

Metro also has a Volunteer Language Review Panel (VLRP) that consists of Metro employees who assist in reviewing translations to ensure accuracy, provide feedback on translated materials, and to assist with translating customer comments.

Priority of Assistance Provision

Translating material for LEP riders is a priority. Metro will make every reasonable effort to deliver 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 12: Language Assistance Service

Language Assistance Service	Implementation Timeline
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 LEPriders and shifting demand	Ongoing
Sensitivity training for new employees and those regularly interfacing with LEP customers	In effect

Employee Training

To ensure that Metro provides timely and reasonable language assistance to our LEP customers we will continue to 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 (Figure 6).

7. Minority Representation on Planning and Advisory Committees

Pursuant to 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 nonelected planning boards, advisory councils and committees. Racial breakdown of the committees is found in Table 13. The boards, councils, and committees are as follows:

- > Community Advisory Council (CAC)
- > East San Fernando Valley Community Leadership Committee (ESFV CLC)
- > Local Service Councils (5):
 - o Gateway Cities
 - o San Fernando Valley
 - o San Gabriel Valley
 - o South Bay
 - o Westside/Central
- > Long Beach – East Los Angeles Community Leadership Committee (LB-ELA CLC)
- > Metro Youth Council (MYC)
- > The Metro Policy Advisory Committee (PAC)
- > The Public Advisory Committee (PSAC)
- > Sustainability Council (SusC)
- > Technical Advisory Committee (TAC)
- > Transportation Business Advisory Council (TBAC)
- > Accessibility Advisory Committee (AAC)
- > Measure M Independent Taxpayer Oversight Committee (MMITOC)
- > Measure R Independent Taxpayer Oversight Committee (MRITOC)
- > Proposition A and C Independent Citizens Advisory and Oversight Committee (ICAOC)

Table 13: Racial Breakdown of Metro Advisory Committees

Advisory Body Name	Latino/ Hispanic	Black/ African American	White/ Caucasian	Asian/ Pacific Islander	Two or more	Other/ Decline To State	Total Survey Response	Total Member Count	Survey response rate
CAC	9 (47.4%)	2 (10.5%)	4 (21.1%)	3 (15.8%)	1 (5.3%)	0 (0%)	19	24	79%
ESFV CLC	8 (53.3%)	1 (6.7%)	4 (26.7%)	0 (0%)	0 (0%)	2 (13.4%)	15	15	100%
LSC (all)	11 (42.3%)	2 (7.7%)	7 (26.9%)	2 (7.7%)	3 (11.5%)	1 (3.8%)	26	45	58%
LB-ELA CLC	6 (42.9%)	2 (14.3%)	1 (7.1%)	1 (7.1%)	3 (21.4%)	1 (7.1%)	14	30	47%
MYC	8 (38.1%)	0 (0%)	3 (14.3%)	5 (23.8%)	5 (23.8%)	0 (0%)	21	27	78%
PAC	5 (41.7%)	1 (8.3%)	4 (33.3%)	0 (0%)	1 (8.3%)	1 (8.3%)	12	24	50%
PSAC	1 (9.1%)	3 (27.3%)	3 (27.3%)	2 (18.2%)	2 (18.2%)	0 (0%)	11	15	73%

SusC	2 (22.2%)	0 (0%)	4 (44.4%)	1 (11.1%)	1 (11.1%)	1 (11.1%)	9	27	33%
TAC	2 (11.1%)	0 (0%)	11 (61.1%)	4 (22.2%)	1 (5.6%)	0 (0%)	18	31	58%
TBAC	-	-	-	-	-	-	0	16	0%
Other*	3 (33%)	1 (11%)	4 (44%)	0 (0%)	0 (0%)	1 (11%)	9	30	30%
Total	55 (35.9%)	12 (7.8%)	45 (29.4%)	18 (11.8%)	17 (11.1%)	6 (4%)	154	284	54.2%

*To protect the personal information of advisory body members, Metro Advisory Bodies with fewer than five (5) survey respondents are grouped as “other.” For the above data, “other” includes the Accessibility Advisory Committee (AAC), Measure M Independent Taxpayer Oversight Committee (MMITOC), Measure R Independent Taxpayer Oversight Committee (MRITOC), and Proposition A and C Independent Citizens Advisory and Oversight Committee (ICAOC).

Description of Efforts Made to Encourage Minority Participation

Community Advisory Council (CAC)

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 several 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. Any member of the public wishing to have meeting materials in a different language can notify Metro staff with such translation requests or other special accommodation needed. Additionally, CAC Meeting Agendas and materials are available in alternate formats including Braille.

East San Fernando Valley Community Leadership Committee (ESFV CLC)

The East San Fernando Valley Community Leadership Council (CLC) is an advisory council to Metro's East San Fernando Valley Light Rail Transit (ESFV LRT) Project. The CLC promotes community-based dialogue and opportunities arising from the ESFV LRT project. CLC members will serve two-year terms as community representatives and will hold quarterly community meetings.

Metro's Service Councils

In 2002, the Metro Board created Metro Service Councils (MSC) as community-based bodies that work to improve bus service and promoted service coordination with municipal and local transit providers. Metro's service area is organized into five geographic regions for service planning purposes: Gateway Cities, San Fernando Valley, San Gabriel Valley, South Bay, and Westside/Central. The Metro Board appoints each Council's nine members after receiving nominations from the region's nominating authorities. Service Councils meet monthly and advise on projects, programs, and bus services in their regions. The MSC bylaws specify that Representatives should live in, work in, or represent the region, have a basic working knowledge of public transit service within their region, and an understanding of passenger transit needs. The MSC are responsible for convening public hearings to receive community input on any proposed major service modifications and Title VI analysis for rail project operating plans within the Service Council's jurisdiction consistent with State and Federal laws and with Metro policies pertaining to public hearings. The MSC also considers staff's recommendations and public comments then render decisions on proposed major bus route changes.

The following map illustrates the five service council areas:



Long Beach – East Los Angeles Community Leadership Committee (LB-ELA CLC)

From 2022 to 2024, the LB-ELA Task Force and CLC worked to identify and collaborate with stakeholders to develop a multimodal investment strategy to improve regional mobility and air quality for communities along I-710 South. The Corridor Mobility Investment Plan, adopted by the Metro Board in April 2024, considers economic vitality, social equity, environmental sustainability, and access to opportunity across transportation and mobility projects and programs.

Metro Youth Council (MYC)

Launched in 2021, Metro Youth Council’s goal is to develop the capacity of young people to be advocates and participate in Metro’s plans, projects, programs, and initiatives. The program offers a space to listen to their concerns, gain insight into their perspectives, encourage active participation, and foster a lasting connection as lifelong riders. Members between the ages of 14 and 17 serve for a one-year term (January to December), meet virtually each month, and represent the nine subregions of LA County.

The Metro Policy Advisory (PAC)

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.

The Public Safety Advisory Committee (PSAC)

The Public Safety Advisory Committee (PSAC) was established by the Metro Board in June 2020 in response to growing concerns about safety on public transit. The committee was created to address rising crime rates, passenger safety, and public perceptions of safety on Metro trains, buses, and stations. This initiative is part of Metro's broader effort to improve security and enhance the rider experience while also engaging communities to explore innovative solutions for reimagining public safety. The PSAC provides feedback on non-law enforcement alternatives, such as Metro's Ambassador Program.

The committee meets monthly and is comprised of 15 diverse voting members throughout LA County. Committee members have expertise in areas such as transit access, social services, homelessness, mental health, public safety, and law enforcement. Metro is committed to ensuring that the perspectives of older adults, youth, and women are represented on the committee.

Sustainability Council (SusC)

Metro's Sustainability Council's mission is to improve sustainability efforts by developing targets, metrics and strategies to assist the agency in achieving stated sustainability program goal including 1) Climate Change & Resiliency, 2) Energy, 3) Solid Waste & Recycling, and 4) Water.

Technical Advisory Committee (TAC)

The Technical Advisory Committee (TAC) provides technical assistance to LACMTA staff by reviewing and evaluating the various transportation proposals and alternatives within Los Angeles County. Transportation issues transmitted to the Committee will include the funding, operation, construction and maintenance of streets and freeways, bus and rail transit, demand and system management, air quality improvements, sustainability and active transportation. The Committee shall review, comment upon, and make recommendations on such matters as are referred to it by LACMTA staff. Cooperatively with the modal Subcommittees defined in Section E, LACMTA staff, will forward issues, projects or programs to the Committee for review and action.

Transportation Business Advisory Council (TBAC)

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, 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
- Filipino American Society of Architects & Engineers Awards Dinner
- 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
- Regional California Black Chamber of Commerce
- National Latina Women's Business Association
- American Indian Chamber of Commerce Luncheon

- Women's Transportation Coalition Expo

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

The Accessibility Advisory Committee (AAC)

Metro strives to ensure that its services are fully accessible to all customers, including those with disabilities. The AAC provides advice to Metro on policy, allocation issues affecting transportation of older adults and people with disabilities, testing of new initiatives including digital applications, infrastructure improvements, and accessible programs and services. 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 committee by providing language interpretation services for Limited English Proficient members on the committee.

Measure M Independent Taxpayer Oversight Committee (MMITOC)

Measure M Independent Taxpayers Oversight Committee is responsible for independent oversight of the expenditures of Measure M, the transportation sales tax passed by L.A. County voters in November 2016.

Measure R Independent Taxpayer Oversight Committee (MRITOC)

The Measure R Oversight Committee is responsible for monitoring and ensuring that all tax measure revenue is used solely for transportation purposes in accordance with the ordinance. Additionally, the committee reviews all proposed debt financing to determine if the benefits of the proposed financing - such as accelerating project delivery, avoiding future cost escalation, and other relevant factors - exceed the associated issuance and interest costs.

Proposition A and C Independent Citizens Advisory and Oversight Committee (ICAOC)

The Independent Citizen's Advisory and Oversight Committee (ICAOC) was appointed under the Metropolitan Transportation Authority Reform and Accountability Act of 1998, approved by voters in November 1998. The purpose of the Act was to provide accountability in the expenditure of Proposition A and Proposition C sales tax revenues through annual independent audits of transportation sales tax expenditures, the creation of an Independent Citizen's Advisory and Oversight Committee, and public hearings on the independent audit reports. The Act requires an annual independent audit of the Propositions A and C Sales Taxes Revenues and Expenditures.

8. Subrecipient Assistance and Monitoring

In accordance with FTA Circular 4702.1B, Metro is committed to ensuring distribution of 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 regarding FTA Title VI compliance. The dates for Title VI submission are assigned on a rolling basis as Metro currently oversees approximately 60 subrecipients. Metro has continued with our Title VI Subrecipient Compliance Training program twice per year. Our training program consists of in-person and virtual 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 Senior Manager for Title VI conducts 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 95 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. Metro's Senior Manager for Title VI works closely with the Grants Management staff to ensure that the process follows Title VI requirements and is done equitably.

The next solicitation and application for Los Angeles County FTA Section 5310 funds is tentatively scheduled for release in December 2025.

Subrecipient	Description
Able ARTS Work/ Formerly Arts & Services for Disabled	Capital and Operating Assistance
Access Services Inc.	Operating and Capital Assistance
Aging Next	Operating Assistance
AltaMed Health Services Corporation	Vehicle Procurements
Antelope Valley Transit Authority (AVTA)	Operating and Capital Assistance
Bob Hope Airport Authority	Transit Center
California State University Northridge	Capital Assistance
Cedars-Sinai Medical Center	Passenger and Pedestrian Enhancement
City of El Segundo	Transit Center
City Los Angeles (City of, includes LADOT)	Passenger and Pedestrian Enhancements/Integrated Mobility Hubs
City of Artesia	Vehicle Procurements
City of Avalon	Capital Assistance
City of Azusa	Parking Structure
City of Baldwin Park	Passenger & Pedestrian Enhancements, Vehicles
City of Bell Gardens	Vehicle Procurements
City of Bellflower	Buses and Passenger & Pedestrian Enhancements
City of Burbank	Bus Procurement
City of Calabasas	Capital Assistance
City of Cerritos	Bus Procurement
City of Compton	Bus Procurement
City of Downey	Vehicle and Equipment Procurements
City of El Monte	Bus Procurement
City of Glendale	Bus Procurement and CNG Facility
City of El Segundo	Capital Assistance
City of Glendora	Capital Assistance
City of Hawaiian Gardens	Bus Shelters
City of Inglewood	Operating and Capital Assistance
City of La Habra Heights	Vehicle Procurements
City of Long Beach, Dept. of Public Works	Bus Shelters and Equipment
City of Manhattan Beach	Capital Assistance
City of Monrovia	Transit Center
City of Monterey Park	Principal Management Analyst
City of Palmdale	Transit Center

City of Pasadena	Bus Procurements, ITS Project
City of San Fernando	Bus Procurement
City of Santa Monica	Operating Assistance
City of Sierra Madre	Buses and CNG Facility
City of South El Monte	Bus Procurement
City of South Gate	Bus Procurement
City of West Hollywood	Operating and Capital Assistance
City of Whittier	Bus shelters and operating assistance
Disabled Resource Center, Inc., (DRC)	Operating Assistance
East Los Angeles Remarkable Citizens Association (EL ARCA)	Vehicle Procurements
FAME	Operating Assistance
Institute for the Redesign of Learning (IRL)	Bus Procurement
Jovenes	Operating Assistance
LA County Aging and Disabilities Dept	Operating and Capital Assistance
Long Beach Transit	Capital and Operating Assistance
Los Angeles Community College District (LACCD)	Passenger and Pedestrian Enhancements
Los Angeles County Department of Public Works	Vehicle Procurements
Los Angeles Jewish Home for the Aging	Vehicle Procurements
New Horizons (SFV-Org)	Capital Assistance
Palos Verdes Peninsula Transit Authority	Bus Procurement
PathPoint	Operating and Capital Assistance
PIH Health (fka Good Samaritan Hospital)	Operating and Capital Assistance
Santa Clarita Valley Committee of Aging (Senior Center)	Vehicle Procurements
Valley Village and Affiliates	Vehicle Procurements
Westside Pacific Villages	Vehicle Procurement and Operating Assistance
White Memorial Medical Center	Operating Assistance

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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 to ensure that locations are selected without regard to race, color, or national origin. Since the last program submission, Metro has not approved construction of a transit facility.

Requirements for Fixed Route Transit Providers

10. System-wide Service Standards and Policies

As stated in the FTA Circular 4702.1B, transit providers of fixed-route service must set service standards and policies for each mode of service provided. Metro's Transit Service Policies and Standards can be found in Attachment C. Below is the Executive Summary of the Service Standards and Policies.

Executive Summary

Los Angeles County Metropolitan Transportation Authority (Metro) serves as transportation planner, coordinator, designer, builder and operator for Los Angeles County. More than 9.2 million people live, work, and play within its 1,447-square-mile service area.

Metro's Transit Service Policy (TSP) establishes criteria and guidelines to ensure that the transit system is developed and managed consistently with policy guidance approved by the Metro Board of Directors, including a formal process for evaluating services, service design guidelines, and a process for approving and implementing service changes.

In 2018, the Board adopted Metro Vision 2028 as the agency's strategic plan. The Plan outlines five goals to guide the development of transportation in LA County to help Metro ensure that our customers feel safe when riding, that they do so in clean equipment, service is reliable and on-time, and our staff provides service in a courteous manner.

- > Goal 1: Provide high-quality mobility options that enable people to spend less time traveling
- > Goal 2: Deliver outstanding trip experiences for all users of the transportation system
- > Goal 3: Enhance communities and lives through mobility and access to opportunity
- > Goal 4: Transform LA County through regional collaboration and national leadership
- > Goal 5: Provide responsive, accountable, and trustworthy governance within the Metro organization

Also in 2018, Metro began the NextGen Bus Study to review and update the Metro bus system to ensure it provides a competitive transit service to meet the travel needs of LA County residents and visitors. The NextGen Bus Study included a comprehensive look at both Metro bus service performance and the overall travel market in LA County to determine where Metro bus service could be more useful. The study included significant input from riders and stakeholders to help develop a framework of guiding

principles for positioning Metro’s bus services to be more competitive in the overall travel market and to serve Equity Focus Communities most effectively, where the need for high quality transit is greatest.

In early 2020, the Metro Board approved the release of a draft NextGen Bus Plan for public review. Significant public input gathered in the first half of 2020 was incorporated into a revised draft NextGen Bus Plan released in July 2020 ahead of public hearings (August 2020), Service Council approvals (September 2020), and Board adoption of this plan in October 2020. Phased implementation of the Reconnect Phase of NextGen Bus Plan with a set of frequency tiers and a simplified route structure focused on fast, frequent, and reliable service began in December 2020, with additional phases in June and September/December-2021. Implementations of key NextGen Bus Plan bus speed and reliability elements, including new bus priority lanes and other bus speed and reliability tools such as transit signal priority and bus stop optimization began at the same time and continue to be implemented as of 2025. This phase of NextGen is known as Transit First. The NextGen elements are all reflected in this update of the Transit Service Policy, and the NextGen Bus Plan remains the guiding principle for the Metro bus network.

11. Monitoring of Transit Service

This is a review of Metro’s compliance with specified service standards and policies under the requirements of FTA Circular 4702.1B, Chapter 4, Section 6. The review covers the period of FY2023 through FY2025.

The following topics are addressed:

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

All reviews assess whether Metro has complied with its policies and standards and whether any non-compliance is biased toward minority populations (disparate impact) or low-income households (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.

There are 2,026 tracts within Metro’s service area that meet the above thresholds of 3 HH/acre and/or 4 jobs/acre. Only seven of these tracts are not within one-quarter mile of fixed route service. This is a service availability of 99.7% which meets the standard.

Service Area Demographics – Minority Population

	Service Area	Tracts Not Served
Population	8,013,557	23,515
Minority Population	5,919,660	7,183
Minority Share	73.9%	30.5%

Service Area Demographics – Low-Income Households

	Service Area	Tracts Not Served
Households	2,787,766	8,713
Low Income Households	1,285,344	2,506
Low Income Share	46.1%	28.8%

Both the minority population share and low-income household share of the unserved tracts are less than the service area minority population and low-income household 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 a determination of Minority routes and Low-income routes so that a comparison of compliance between Minority and 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, or 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 the 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 the population.

Metro operates 116 fixed-route bus lines . Of those analysis finds that 84 of these are Minority lines (72%), and 94 are Low-income lines (81%). 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 FY23. The adopted headway standards follow:

Bus Headway Standards

Service Type	Peak Max.(in min)	Off-Peak Max(in min)
Liner	12	30
Rapid	20	30
Tier 1 (Core)	10	10 - 15
Tier 2 (Convenience)	15	15 - 30
Tier 3 (Connectivity)	30	30 - 60
Tier 4 (Community)	60	60
Tier 5 (Commuter)	Varies	Varies

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

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 by at least 90% of all hourly periods

Compliance determination was calculated by referring to scheduled service in effect as of December 15, 2024, which represents the full implementation of the NextGen Service Plan.

Weekday Headway Compliance - 116 of Bus Lines

	All Lines	Minority Lines Only	Low Income Lines Only	All Compliance	Minority Compliance	Low Income Compliance
Meets Standard	97	68	77	83%	81%	83%
Exceeds Standard	19	16	16			

Saturday Headway Compliance - 110 of Bus Lines

	All Lines	Minority Lines Only	Low Income Lines Only	All Compliance	Minority Compliance	Low Income Compliance
Meets Standard	109	77	86	99%	99%	99%

Exceeds Standard	1	1	1			
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Sunday & Holiday Compliance - 110 of Bus Lines

	All Lines	Minority Lines Only	Low Income Only	All Compliance	Minority Compliance	Low Income Compliance
Meets Standard	109	77	86	99%	99%	99%
Exceeds Standard	1	1	1			

Headway compliance is an issue for 19 lines (16%) on weekdays and for only one line on weekends. As most of the system is both minority and low-income lines, the percentages that achieve the standard are all within 3% of each other for weekdays, Saturdays, and Sundays/Holidays. Consequently, there are no observations of disparate impacts on minorities and disproportionate burdens on low-income lines since everything is less than the 5% threshold. Overall weekday compliance will improve with further finetuning of resources and scheduling.

4. Loading Standards

Current service standards were adopted in FY23. The adopted passenger loading standards follow:

Bus Passenger Loading Standards

Service Type	Peak Passengers/Seat	Off-Peak Passengers/Seat
32 FT Bus	1.30	1.30
40 FT Bus	1.30	1.30
45 FT Bus	1.30	1.30
60 FT Bus	1.30	1.30

Must not exceed at least 95% of all hourly periods

Rail Passenger Loading Standards

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

Must not exceed 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.

Loading on the bus system is monitored every six months using quarterly APC data for maximum loads at time points. As the most recent bus load standard evaluation was performed using October through December 2024 data, the samples collected from rail ride checks were compiled for the same three months.

Bus monitoring is more extensive as all buses are equipped with APCs, and data is available for all time points along each bus route for observed maximum loads by trip. Every six months, the most recent quarterly data is evaluated to determine adherence to the adopted standards.

Bus Load Standard Monitoring

Day Type	# Trips	Within Standard	% Compliance
Weekdays	591,114	577,214	97.6%
Saturdays	84,719	83,614	98.7%
Sundays/Holidays	96,537	95,898	99.3%

In reviewing the data, Lines 14, 45, 105, 108, and 166 failed to meet the standard on weekdays, Lines 62 and 115 failed to meet the standard on Saturdays, and Line 117 failed to meet the standard on Sundays. Other than these exceptions, the rest of the bus system was in conformance with the adopted loading standards. Also, extra trips are added on any bus line such as those listed above where the load standard has been consistently exceeded, to bring them into compliance.

Heavy rail is based on trip samples collected by schedule checkers. Checkers ride randomly selected cars on randomly selected trips and recording data for boardings and alightings by station. Over a six-month sliding time frame, this data is aggregated to build a profile of rail ridership. This is the primary source for ridership estimation by day type and line. While only one car is monitored on any given sample trip, whether that car meets the loading standard is a surrogate for whether trains are meeting the standard. Each heavy 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 maximum accumulated load (calculated from the observations in each check).

Light rail cars are equipped with Automated Passenger Counters (APC). Data collected through use of the APCs is used for the basis of the light rail loading standard.

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 October through December 2025 which is the same time frame used for bus monitoring.

Weekday Rail Load Standard Monitoring

	Weekdays		
	# Of Checks/Trips	Within Standard	% Compliance
Heavy Rail	1,076	1,075	100%
Light Rail	65,734	65,688	100%

Weekend Rail Load Standard Monitoring

	Saturday	Sundays & Holidays
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	# Of Checks/ Trips	Within Standard	% Compliance	# Of Checks/ Trips	Within Standard	% Compliance
Heavy Rail	981	981	100%	969	969	100%
Light Rail	11,224	11,208	100%	13,935	13,935	100%

Both modes met the standard at least 95% of the time, and each line was always found in compliance, as well.

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 for bus service and at the end terminal for rail service for arrivals. Buses should be on time at least 85% of the time while heavy rail and light rail service should be on time at least 95% and 90% respectively. The one exception is Line 16 which operated on a headway-based schedule as part of a demonstration program seeing if that is a better way to operate higher frequent service bus line. The pilot period lasted 18 months (June 2023 to December 2024). Findings from the pilot are still being evaluated.

Rail is currently monitored using HASTUS. Since the bus service is evaluated every six months using quarterly data, the rail evaluation was performed on data for the months of October through December 2024.

Weekday Rail On-Time Performance

Mode	Scheduled Trips Sum	Total Delays Sum	On-Time Percentage
Heavy Rail	22,617	37	99.84%
Light Rail	57,143	693	98.79%

Saturday Rail On-Time Performance

Mode	Scheduled Trips Sum	Total Delays Sum	On-Time Percentage
Heavy Rail	4,303	0	100.00%
Light Rail	9,945	37	99.63%

Sundays & Holidays Rail On-Time Performance

Mode	# of Time Point Observations	# of On-Time Observations	On-Time Percentage
Heavy Rail	4,965	1	99.98%
Light Rail	11,665	36	99.69%

We find that on-time performance for both heavy and light rail is very good and consistently exceeds the standard.

However, bus on-time performance is consistently short of the 85% objective. The following observations are based on the three months of data from October through December 2024.

Bus Weekday On-Time Performance

	All Lines	Minority Lines	Low Income Lines
Avg On-Time %	71.8%	70.3%	24.6%
Lines Meeting Standard	1	1	0
Lines Failing Standard	114	82	87
% Meeting Standard	1%	1%	0%

Bus Saturday On-Time Performance

	All Lines	Minority Lines	Low Income Lines
Avg On-Time %	71.2%	68.5%	27.1%
Lines Meeting Standard	5	3	3
Lines Failing Standard	104	75	86
% Meeting Standard	5%	4%	3%

Bus Sunday & Holiday On-Time Performance

	All Lines	Minority Lines	Low Income Lines
Avg On-Time %	78.9%	76.4%	17.4%
Lines Meeting Std	15	12	11
Lines Failing Std	87	66	68
% Meeting Std	15%	15%	14%

On any given day type non-Minority, non-Low income, Minority, and Low income bus lines exhibit similar on-time percentages. Unfortunately, only a handful of bus lines achieve the 85% on-time standard with the lowest percentages on Weekdays where there is more congestion, and the highest on Sundays and Holidays where congestion is the lowest. Systemwide, bus service does not meet the standard whether it is all the lines, minority lines, or low-income lines. Since most of the system is both minority and low-income lines, the percentages that achieve the standard are all within 1% of each other for weekdays, Saturdays, and Sundays/Holidays. Consequently, there are no observations of disparate impacts on minorities and disproportionate burdens on low-income lines because everything is less than the 5% threshold.

Please note, a significant reason for the low rates of on-time performance is related to the route running times used for scheduling. During the beginning of the COVID-19 pandemic in 2020, traffic congestion dropped significantly. Accordingly, running time was reduced systemwide. Now that congestion has returned to roughly pre-COVID-19 levels, the running time used for scheduling was no longer adequate. Much of this was addressed by restoring the schedule to pre-COVID-19 service levels and implementing the initial portions of the NextGen speed and reliability program. The on-time

performance will improve as more of the NextGen Speed and Reliability Program is implemented and with better service monitoring.

6. Stop Spacing Standards

Stop spacing standards were incorporated with the FY23 Metro Service Policy update. It states the maximum average stop/station spacing in miles by type of service, and that it is not to be exceeded by at least 90% of all routes operated.

Maximum Average Stop/Station Spacing Standards

Service Type	Average Stop Spacing
Heavy Rail	1.50
Light Rail	1.50
Liner	1.25
Rapid	0.75
Commuter (Tier 5)	1.25
Local (Tiers 1- 4)	0.25

Transit Line Average Stop/Station Spacing

Service Type	No. of Lines Meeting Standard	No. of Lines Not Meeting Standard	Service Type Average
Heavy Rail	2	0	0.99 miles
Light Rail	3	1	1.04 miles
Liner	3	0	1.09 miles
Rapid	3	0	0.63 miles
Commuter (Tier 5)	6	0	0.67 miles
Local (Tiers 1- 4)	75	29	0.24 miles

As shown above, one light rail line does not meet the standard. This is the C Line which has average stop spacing of 1.62 miles, just above the average maximum spacing. Though it exceeds the standard, the spacing is appropriate due to the travel market for the corridor. Moreover, most of the line was built in 1995 before Metro had established official stop spacing standards.

In terms of local bus lines, 28% do not meet the maximum average stop spacing standard due to a variety of reasons. Reasons include:

- long stretches of parking, industrial space, freeway infrastructure, and long street-facing walls;
- greenspace (Lines 62, 120, 125, 128, 154, 161, 179, 232, 235-236, 244, 265, and 296);
- small segments of freeway operation (Line 258);
- long segments of undeveloped or vacant land (Lines 233, 260-261, 266 and 690);

- steep terrain (Lines 218, 222 and 233)
- lack of safe pedestrian crossings (Lines 62, 128, 150, 154, 158, 161, 218, 222, 265, and 601);
- lack of ADA-compliant stop locations (Lines 235-236, 237, 244, 268, and 344);
or
- stop restrictions per agreement with municipal operators where there is overlapping service (Lines 233 and 344).

Overall, most of Metro’s bus service is compliant.

7. Passenger Amenities Standards

Metro’s Service Policy passenger amenities standards for rail stations and off-street bus stops and stations. 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

This 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

This 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

This 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 as Metro has no jurisdiction over street furniture or other appurtenances. The latter are controlled by individual cities and often contracted to third parties who support their costs through advertising revenues.

All applicable facilities are in compliance, including all three Regional Connector Stations and the nine K Line Stations that were built since the last review.

8. 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 and rail car weight with rail line(s) served. Wherever possible, there are 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, Metro has historically looked at the average age of vehicles assigned to each facility to ensure that there are “no extremes” serving any area. This is most applicable to the bus system, but data for rail is provided as well. Rail Fleet Services considers a rail vehicle to be like new when it undergoes its mid-life modernization program. Consequently, the average age is recalculated for vehicles for these vehicles.

Heavy Rail – Vehicle Age by Facility

Facility	Model	# Active	Average Age (years)
Div. 20 – Los Angeles	Breda A650 Base	26	32.3
	Breda A650 Option	74	26.5
		100	28.0

Light Rail – Vehicle Age by Facility

Facility	Model	# Active	Average Age (years)
Div. 11 – Long Beach	Alstom P2000	52	3.5
	Kinkisharyo P3010	42	6.6

		94	4.9
Div. 14 – Santa Monica	Kinkisharyo P3010	55	8.4
		55	8.4
Div 16 - Westchester	Kinkisharyo P3010	27	7.4
		27	7.4
Div. 21 – Los Angeles	Kinkisharyo P3010	39	8.1
		39	8.1
Div. 22 - Lawndale	Kinkisharyo P3010	27	4.3
		27	4.3
Div. 24 - Monrovia	AnseldoBreda2550Base	50	15.6
	Kinkisharyo P3010	45	6.6
		95	11.3

Note: As of the end of FY25.

There are two factors to consider with the light rail assignments. First, the Anseldo Breda 2550 Base vehicles may not be operated from Div. 22 as they are too heavy for the C Line. Second, Rail Fleet Services tries to limit the number of vehicle models to two per rail division to minimize the training and part supply requirements.

Each light rail facility's average vehicle age is between 6 and 13 years which is consistently young to medium for vehicles that should have a 30-year life span. Meanwhile, Breda A650 option heavy rail cars are nearly at the end of their useful life and will be replaced once the new HR4000 vehicles start arriving in the second half of FY26. Meanwhile, the Breda A650 option vehicles are currently undergoing a mid-life overhaul/modernization program which is expected to extend the life of these vehicles at least five more years.

Bus – Vehicle Age by Facility – Directly Operated

Division	32-foot	40-foot	45-foot	60-foot	# of Buses	Avg. Age
1		129	33	21	183	7.9
2		175			175	10.0
3		139	35		174	8.1
5		121		43	164	11.4
7		108	70	23	201	11.4
8		127	26	44	197	7.4
9		152	28		180	7.4
13		44	47	87	178	10.7
15		201		29	230	7.5
18		158	41	23	222	8.8

Note: As of the end of FY25.

Bus – Vehicle Age by Facility – Contract

Division	32-foot	40-foot	45-foot	60-foot	# of Buses	Avg. Age
95	13	22	11		46	13.1
97	7	68			75	7.8

Note: As of the end of FY25.

Bus – Vehicle Age Summary

	32-foot	40-foot	45-foot	60-foot	# of Buses	Avg. Age
System	20	1,444	291	270	2,205	9.1

Note: As of the end of FY25

The average fleet age by Division ranges from 7.4 years for directly operated Divisions 8 and 9, to 13.1 years for contract-operated Division 95. All average ages are within 4 years of the system average. The useful life for a bus ranges from 12 to 15 years, so, the average age of each division fleet is well within this range, but the buses at Division 95 are eligible for replacement now and buses at Division 2, 7, 8, and 13 will become eligible during the next three-year cycle. In 2019, Division 97 had the oldest average fleet. Consequently, it now has one of the youngest fleets since it was next in line to have its fleet replaced. Within the next few years, the 32-foot and 45-foot buses will be phased out. Then during the next decade, the entire bus fleet will be converted over to battery electric or hydrogen fuel cell buses. Buses for the J Line are being converted now to electric buses while the rest of Metro's bus fleet will begin transitioning by the end of FY27.

Conclusion

In conclusion, the results of the service monitoring indicate that the adopted systemwide standards are set properly. However, Metro needs to significantly improve the systemwide bus service on-time performance and to a lesser extent, headway compliance on weekdays. On-time performance will improve as more of the NextGen Speed and Reliability Program is implemented and better service monitoring. Overall weekday compliance will improve with fine tuning of resources and scheduling.

12. Collection and Reporting of Demographic Data

In compliance with Title 49 CFR Section 21.9 (b), transit agencies with 50 or more fixed route vehicles in peak service and are located in urbanized areas of 200,000 or more in population shall collect and analyze important demographic information that will help develop a demographic profile to compare minority riders and non-minority riders, and the travel patterns.

Metro Research, within the Countywide Planning Department, has been fielding an on-board customer satisfaction survey of Metro bus and rail lines at least once a year since 2003 (with the exception of 2020 and 2021 due to the COVID-19 Pandemic). 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, Office of Civil Rights, Racial Equity & Inclusion, Metro Operations, Governance Councils, Safety, Security and Law Enforcement, 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 results included below are from the most recent iteration of the survey, the Fall 2024 Onboard Customer Satisfaction Survey. Keeping with historical trends, Metro's ridership remains heavily low income (Median income of \$17,028 and 89% at or below HUD's "Very Low Income" threshold), minority (90% of riders are BIPOC), and transit-dependent (only 15% of riders had access to a car to complete the trip they were surveyed on).

The COVID-19 Pandemic and other variables outside of Metro's direct control dramatically altered the transit landscape in Los Angeles. The new normal of work from home and hybrid schedules (22% of Metro riders are full-time telecommuters), has reduced the amount of work-related trips being taken in LA County, removing trips that have historically been taken on Metro's system.

Metro fixed route transit ridership overall remains lower than pre-pandemic levels. Weekday bus, weekday rail, Saturday rail and Sunday are still down 7.8%, 35.5%, 13.9%, and 10.8% respectfully. However, bus ridership for Saturday and Sunday is up 2.7% and 13.9% respectfully. This is despite implementation of most of the NextGen Bus Plan and the opening of the Region Connector and all but one station of the K Line. Much of this is attributable to factors such as gentrification of traditionally core transit areas, people working from home, and the perceived safety of the system.

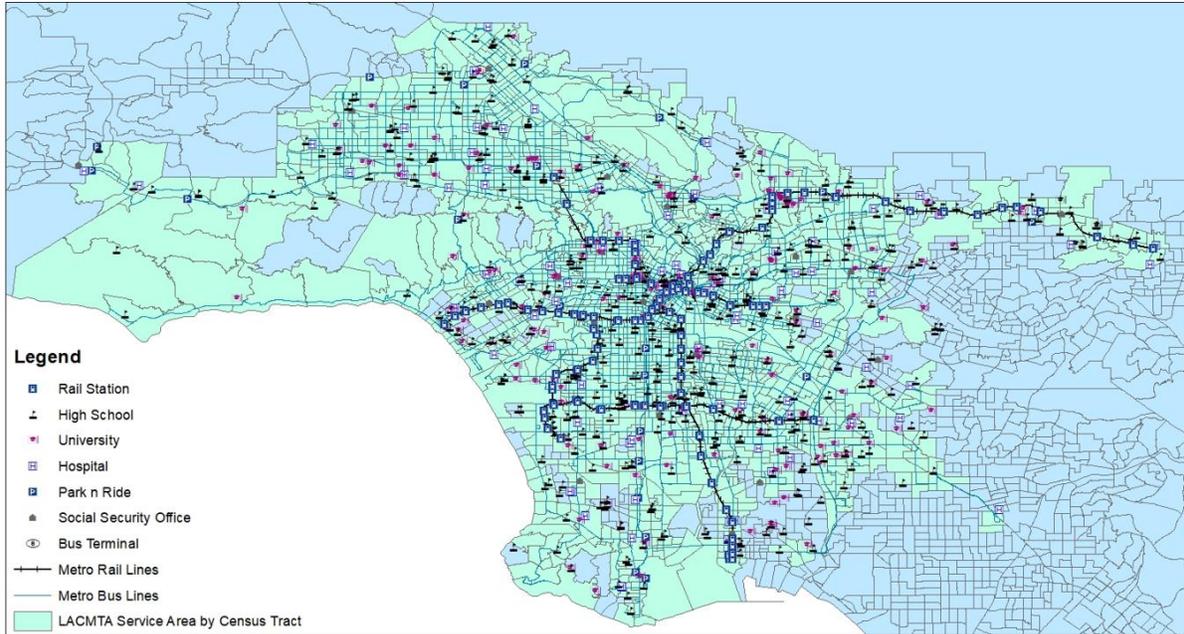
This, coupled with the worsening housing and mental health crisis in Los Angeles, saw decreased perceptions of safety, cleanliness, and a sizable drop in female ridership from 2019-2024 (female ridership is only 45%, a full 6 percentage points lower than 2019). But ridership is returning, able to slowly, and is expected to increase significantly once more of the NextGen Speed and Reliability program is implemented, expanding the Customer Experience program, station safety and fare evasion measures,

the opening of the LAX/Metro Transit Center Station, the A Line Pomona Extension and the Purple Line Extension and re-establishing Metro's Police and Safety Department.

The following maps illustrate Metro's service area and facilities with overlays depicting minority and low-income populations.



Title VI Monitoring: LACMTA Transit Service Per June December 2024 Service Change

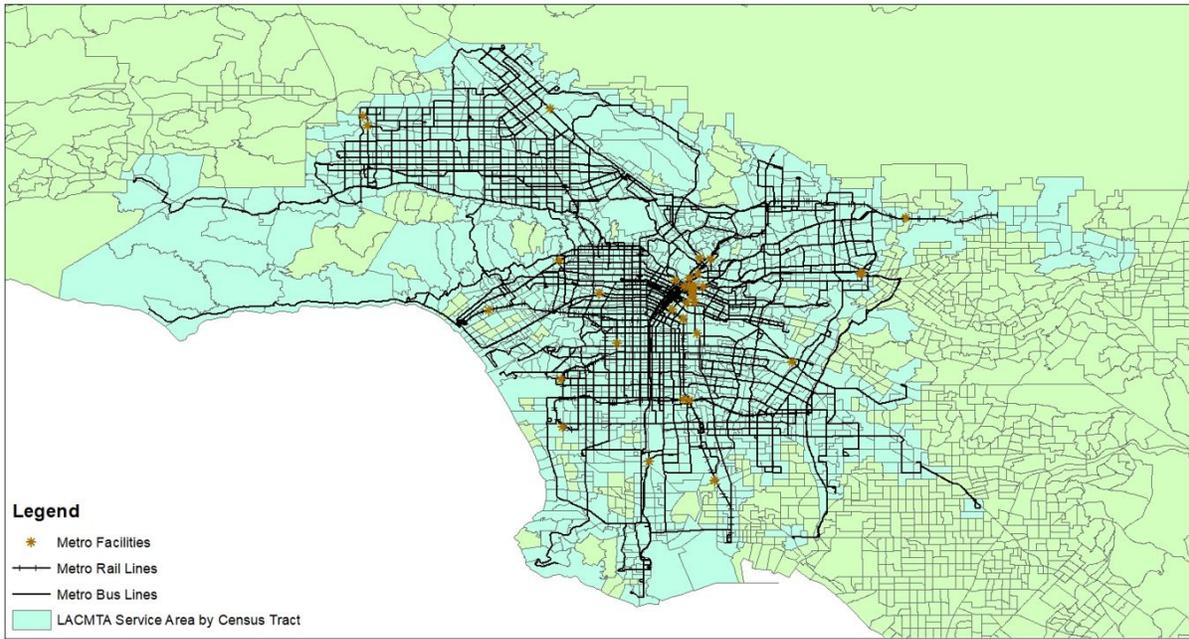


Prepared by Metro Service Development

April, 2025



Title VI Monitoring: LACMTA Transit Facilities with Metro Transit Lines

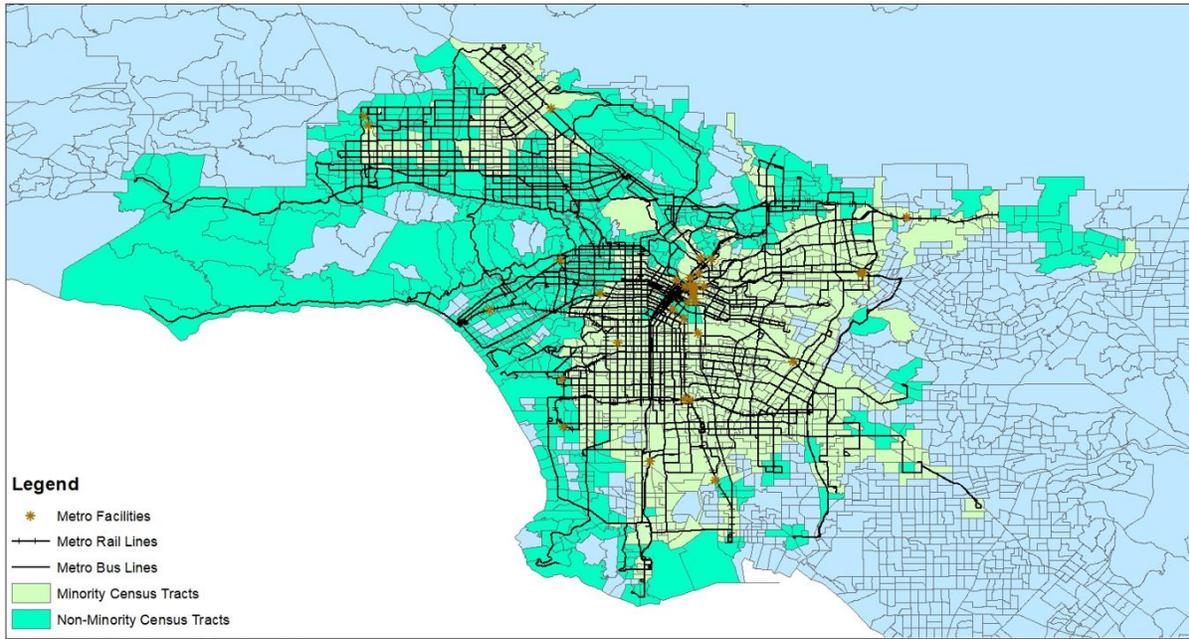


Prepared by Metro Service Development

April, 2025



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

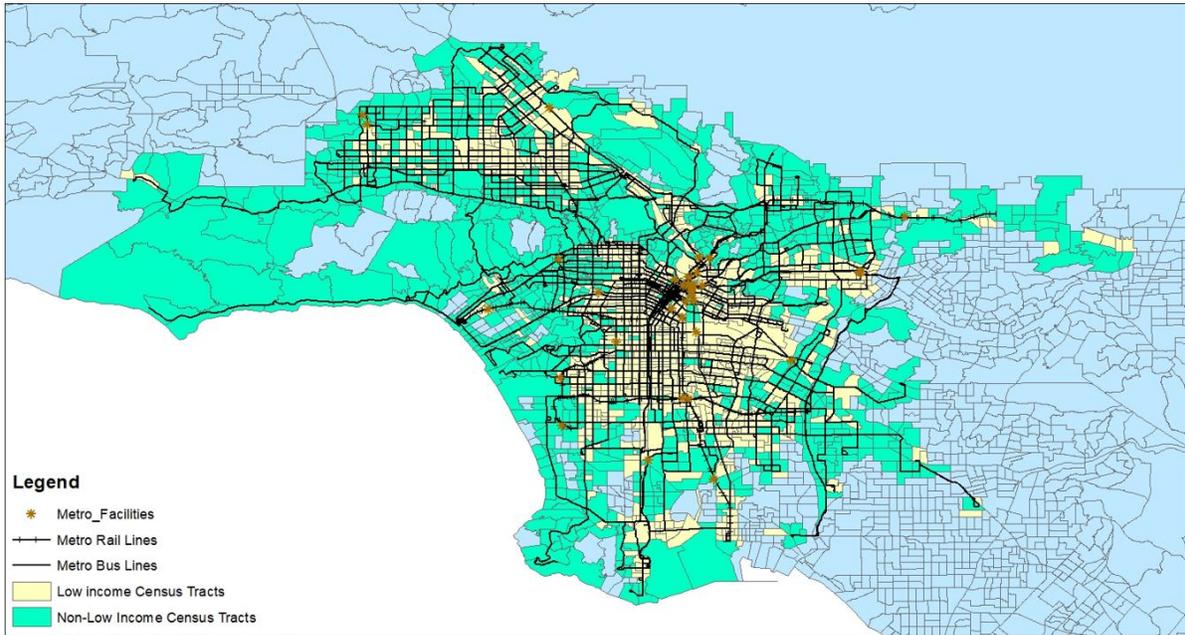


Prepared by Metro Service Development

April, 2025



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



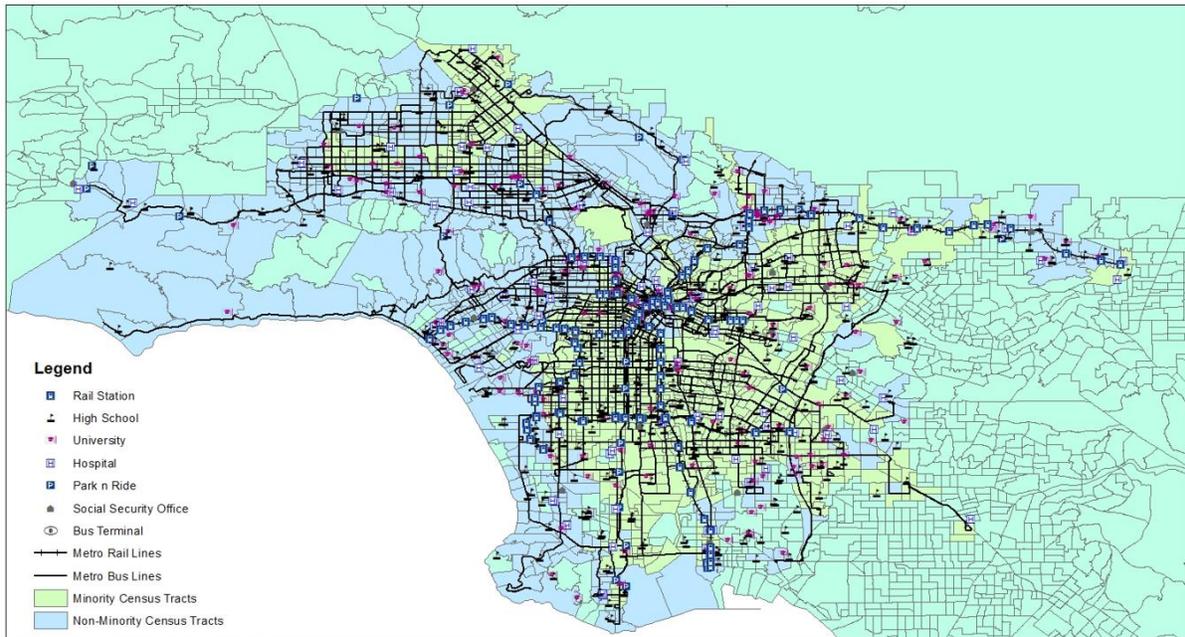
- Legend**
- ★ Metro_Facilities
 - + Metro Rail Lines
 - Metro Bus Lines
 - Low Income Census Tracts
 - Non-Low Income Census Tracts

Prepared by Metro Service Development

April, 2025



Title VI Monitoring: LACMTA Transit Service with Minority Census Tracts Per June December 2024 Service Change



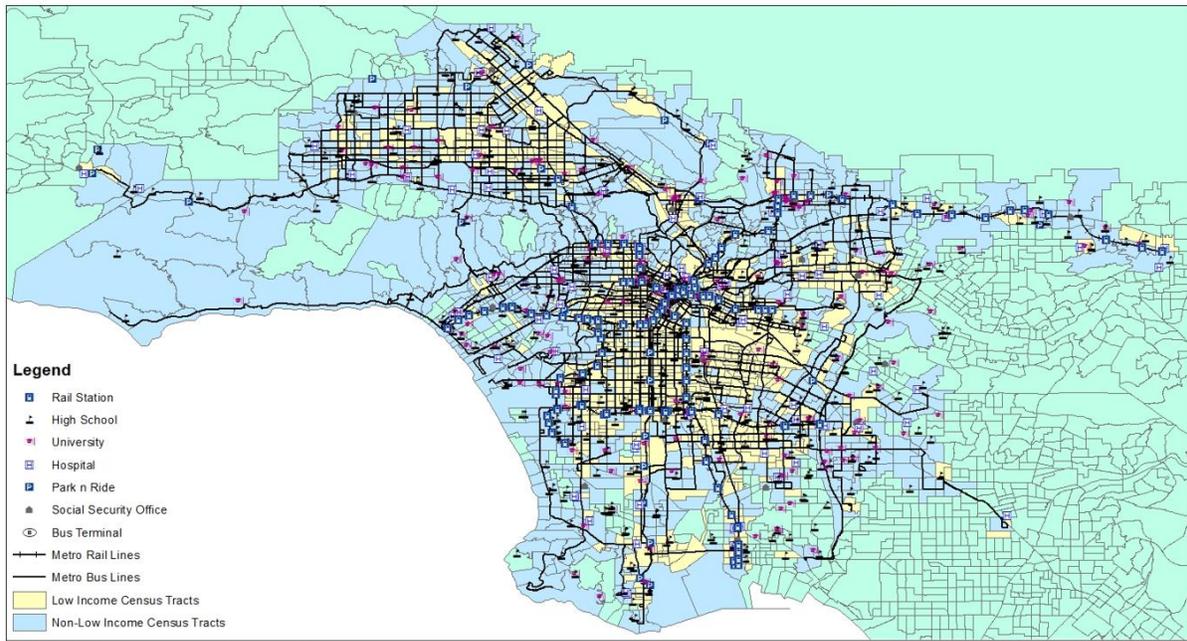
- Legend**
- Rail Station
 - ▲ High School
 - University
 - Hospital
 - Park n Ride
 - Social Security Office
 - Bus Terminal
 - + Metro Rail Lines
 - Metro Bus Lines
 - Minority Census Tracts
 - Non-Minority Census Tracts

Prepared by Metro Service Development

April, 2025



Title VI Monitoring: LACMTA Transit Service with Low Income Census Tracts Per June December 2024 Service Change



Prepared by Metro Service Development

April, 2025

13. Equity Analyses of Service and Fare Changes

Title 49 CFR Section 21.9 (b) and the FTA Circular 4702.1B “Title VI Requirements and Guidelines for Federal Transit Administration Recipients” states that transit providers that operate 50 or more fixed route vehicles in peak service and are located in a UZA of 200,000 or more in population prepare and submit service and fare equity analyses. Since October 2022, Metro conducted the following service and fare changes.

Service Equity Analyses

Metro makes service changes twice per year, each June and December. For each service change, an analysis is conducted to determine if any service changes constitute a major service change (as documented in Metro’s service change policy) that would require an equity analysis. There were no major service changes that were not already analyzed as part of the NextGen Bus Plan approval process in 2020.

Recent changes to Metro rail service include the following:

The Crenshaw light rail project is a recent new service alignment that began service in October 2022 consisting of an 8.5-mile extension of the C Line from Aviation/Imperial Station to the E Line at Exposition/Crenshaw. The Crenshaw Line, also known as the K Line, opened in three phases due to construction of the Airport Metro Connector station opening in 2025. The equity analysis for the Crenshaw Rail Project is found in Attachment D.

The Regional Connector light rail project is another new rail alignment that began operation in June 2023. It is a 1.9-mile underground light-rail system connecting the Metro L Line to 7th Street/Metro Center Station. The equity analysis for the Regional Connector light rail project can be found in Attachment E.

The Foothill 2B Phase I Rail Project (A Line Glendora to Pomona Extension) consists of a 9.2-mile extension of the existing A Line light rail, extending from its current northern terminus at APU/Citrus College Station. This extension introduces four new stations located in Glendora, San Dimas, La Verne, and Pomona. An opening date has not yet been determined. The equity analysis for the Foothill 2B Phase I can be found in Attachment F.

Additional change involves the D Line Subway Extension Project which will continue from the current D Line terminus at the Wilshire/Western Station, extending westward for nearly nine miles along Wilshire Boulevard, and will add seven new stations. The extension is being constructed and will open service in three sections. Opening dates for each of the three sections have not yet been determined. The equity analysis for the D Line Subway Extension Project can be found in Attachment G. Existing D Line heavy rail (subway) service would continue to operate between Union Station and Wilshire/Western Station, then continue west to serve:

- > New Section 1 Stations: Wilshire/La Brea, Wilshire/Fairfax, and Wilshire/La Cienega Stations later in 2025;
- > New Section 2 Stations: Wilshire/Rodeo (construction name) and Century City Stations, projected opening Summer 2026;

- > New Section 3 Stations: Westwood/UCLA and Westwood/VA Hospital, projected opening Summer 2027.

Fare Equity Analyses

Since the last Title VI Program Update was submitted in October 2022, Metro implemented a revised fare payment structure, including introduction of fare capping. Fare capping established an equitable, pay-as-you-go fare payment model that ensures customers never overpay for transit. Instead of purchasing a daily or monthly pass upfront, customers can load Stored Value onto a TAP card or the TAP mobile app and pay per trip. Once they reach the 1-Day or 7-Day fare cap, additional rides within that period are free. As stated in the Federal Transit Administration (FTA) Title VI Circular 4702.1B, Chapter 4, Section 7(b), transit agencies must conduct a fare equity analysis for any fare changes, regardless of the amount increased or decreased. A fare equity analysis was conducted and approved by the Board in December 2022 for the fare restructuring model. Results of the analysis along with Board approval can be found in Attachment H.

In collaboration with the Los Angeles Department of Transportation (LADOT), Metro is implementing the Mobility Wallet Pilot Program. The program provides low-income participants with a prepaid debit card loaded with \$150 per month for transportation expenses over a 12-month period. Phase I launched in May 2023, providing 1,000 low-income residents in South Los Angeles with \$150 per month for 12 months to use across multiple transportation options. Phase II, launched in summer 2024, expanding access countywide, awarding 2,000 Mobility Wallets to eligible participants in February 2025. Phase III, scheduled for 2026, will further expand the program with support from Caltrans and a federal ATTAIN grant. This phase is a key component of Metro's preparations for the 2028 Olympics and Paralympics, helping to modernize fare payment systems across regional transit networks.

Metro requested a waiver from the requirement to conduct a fare equity analysis after implementing the Mobility Wallet pilot program for six months. The waiver was approved by FTA and granted Metro an extension to conduct the fare equity analysis after completion of Phase II, scheduled to conclude in Fall 2025. This approved extension will allow Metro to gather comprehensive demographic and ridership data, analyze the impact on access to opportunity for low-income residents, and evaluate the potential for expansion of Mobility Wallets in Los Angeles County. The FTA fare equity analysis extension letter is found in Attachment I.

Additional enhancements to the fare payment system have been proposed to better meet the needs of customers. This includes new payment options under the upcoming TAP Plus project, which will introduce system upgrades such as open payment and an account-based system, allowing customers to tap a contactless debit or credit card, or digital wallet, directly on the TAP validators, as well as offer expanded capabilities for QR code event ticketing. This improvement will be implemented on the Metro system and 26 TAP partner transit operators.

Customers who pay with cash or who lack internet access or smartphones will still be able to use the Metro system and the other 26 TAP partner transit operators as they do today. Existing fare payment methods or amenities will remain unchanged with the TAP upgrades. Because TAP Plus will not involve any fare changes, an equity analysis is not required.

Low Income Fare is Easy (LIFE) Program Exemption for Wildfire Recovery for Palisades and Eaton Fires

On the evening of Tuesday, January 7, 2025, wildfires, propelled by hurricane-force winds, low humidity and dry bush, burned through multiple communities in Los Angeles County. The Palisades fire, which had started that morning, would go on to burn through more than 23,000 acres, reducing much of a vibrant community to ash, and killing at least eight people. The Eaton fire that tore through Altadena ravaged more than 14,000 acres, destroyed thousands of homes and businesses, and left at least seventeen dead.

Metro's role in ensuring its customers have access to transportation options during and after this crisis would be deemed critical to individuals and families, displaced by wildfires. Metro's wildfire response also included financial assistance and access to resources for Metro employees who have been displaced and need significant support to rebuild their homes and lives as they recover.

On January 23, 2025, the Metro Board passed motion 2025-0039 by Directors Hahn, Barger, Horvath, Solis, Dutra and Bass which required staff to do the following:

- Modify the eligibility criteria of the Low-Income Fare is Easy (LIFE) program to include individuals and families displaced by the wildfires for six months, with an option to extend the program as needed.
- Mobilize outreach teams to the Eaton and Palisades Fire evacuation centers, resource centers, workshops, and other critical locations, providing resources to wildfire survivors, to assist in the registration efforts for reduced fare programs.

Since January 23, the modified LIFE Program has offered stakeholders, impacted by these wildfires, a 30-day pre-loaded TAP card and ability to enroll in the LIFE Program to receive a 90-day regional pass and 20 free rides monthly for 6 months. Staff attended 85 events organized by FEMA, Red Cross and local nonprofit organizations and enrolled over 6,310 participants (2,931 Eaton Fire, 824 Palisades Fire, 20 Hurst Fire, and 2,535 workers, unhoused, etc). 39% of enrolled wildfire recovery participants used these benefits.

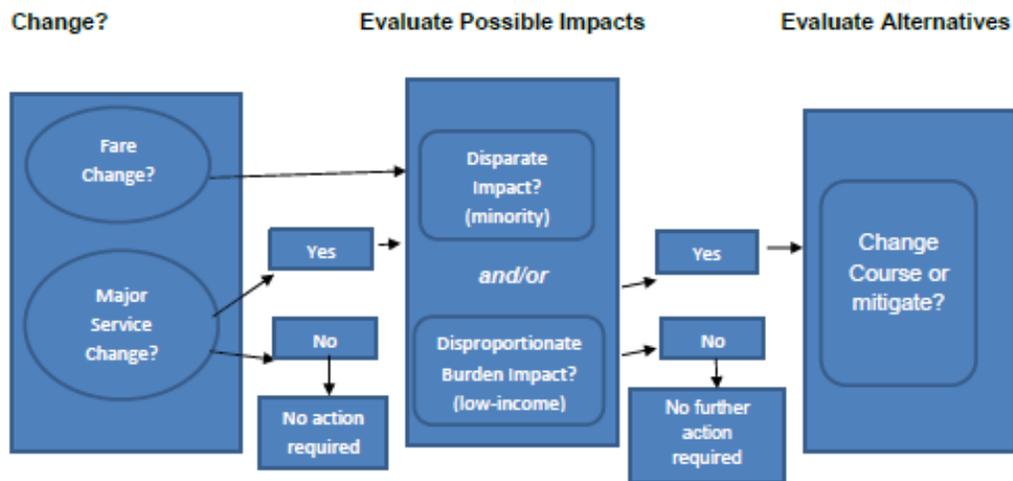
A fare equity analysis will be conducted with guidance from FTA if the Board approves extending the program to provide continued assistance to those impacted by the wildfires. Although income requirements were lifted demographic data was collected.

- **Gender:** 54% (Women), 41% (Male), 5% (Prefer not to Answer)
- **Ethnicity:** 7% (Asian), 15% (Black), 27% (Hispanic), 17% White, 19% (Prefer not to Answer), 11% (No Answer), 4% (Other)
- **Age:** 25% (62+ yrs), 19% (52-61 yrs), 18% (42-51yrs), 20% (32-41yrs), 18% (18-31yrs)

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 2025 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.

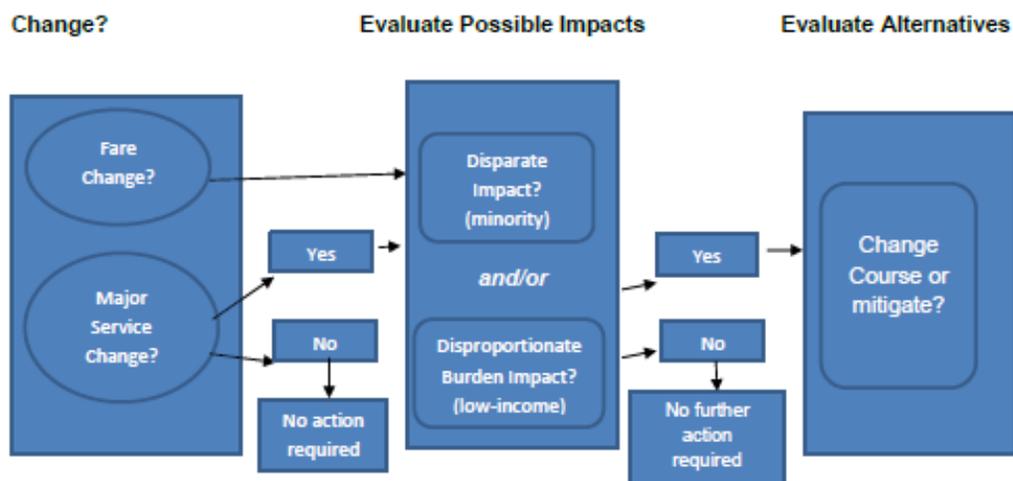
Metro Disparate Impact Policy

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 2025 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.

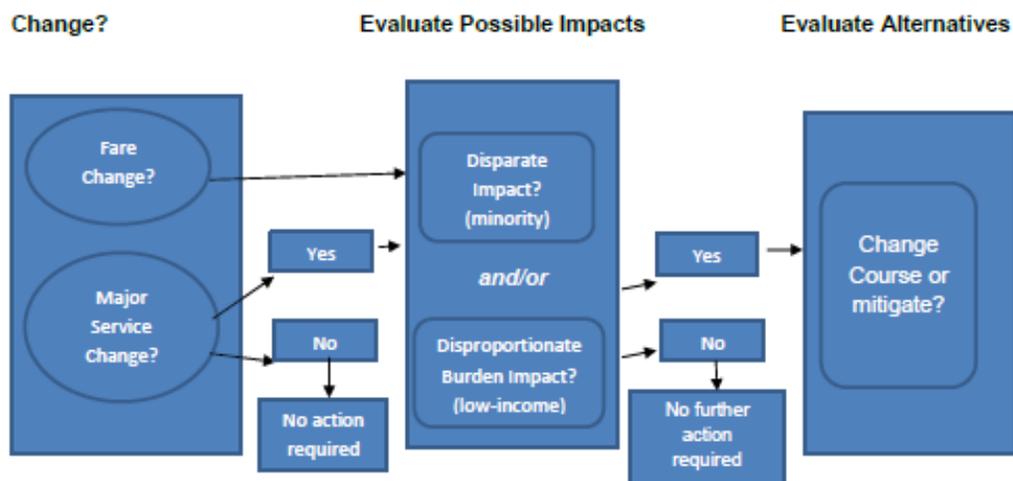
- a. For major service changes, a disparate impact will be deemed to have occurred if the absolute difference between the percentage of minority adversely affected and the overall percentage of minorities is at least five percent (5%).
- b. For any applicable fare changes, a disparate impact will be 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%).

Metro Disproportionate Burden Policy

FTA Circular 4702.1B, revised in 2012, requires transportation agencies to develop a policy 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. Metro defines low-income riders as those with an annual income of \$69,350 or less for a four-member household in Los Angeles County, using the highest tier break in the American Community Survey (ACS) data that most closely aligns with the 2024 California Housing and Community Development (HCD) thresholds. 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 2025 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 the percentage of low-income persons 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 persons adversely affected and the overall percentage of low-income persons is at least five percent (5%).³

³ Metro's Disproportionate Burden policy is subject to change pending further FTA guidance.

**TITLE VI PROGRAM UPATE
ATTACHMENTS**

ATTACHMENT A



Metro

**CIVIL RIGHTS
Civil Rights Policy**

(CIV 5)

POLICY STATEMENT

The Los Angeles County Metropolitan Transportation Authority (LACMTA) is committed to ensuring that no person is excluded from or denied the benefits of its services based on race, color, or national origin, in accordance with Title VI of the Civil Rights Act of 1964. LACMTA additionally prohibits discrimination in the provision of services based on religion, sex, age (40 and over), physical disability or medical condition (including HIV, AIDS, and cancer), pregnancy (including childbirth), mental disability, ancestry, marital status, sexual orientation, gender identity, gender expression, military or veteran status, genetic information, or any similar protected category under applicable federal or state law.

PURPOSE

This policy mandates that LACMTA services (including fare, routing, scheduling, and transportation quality programs) are implemented so as not to discriminate against any person based on race, color, national origin, religion, sex, age (40 and over), physical disability or medical condition (including HIV, AIDS, and cancer), pregnancy (including childbirth), mental disability, ancestry, marital status, sexual orientation, gender identity, gender expression, military or veteran status, genetic information, or any similar protected category under applicable federal or state law. LACMTA service decisions including service frequency and routes, vehicle maintenance and procurement, and infrastructure maintenance and planning will be determined based on legitimate, business-related considerations. This policy is updated annually.

APPLICATION

This policy applies to all LACMTA employees, applicants, contractors, and customers with respect to LACMTA services, programs, and activities.

Razmig Khayalian
APPROVED: County Counsel or N/A

Nico Anagnostis
Department Head

John W. King
ADOPTED: CEO

Effective Date: 7/25/24



Metro

CIVIL RIGHTS Civil Rights Policy

(CIV 5)

1.0 GENERAL

LACMTA is committed to equal access and ensuring that no person is excluded from participation in its services, or subjected to denial of LACMTA benefits on the basis of race, color, national origin, religion, sex, age (40 and over), physical disability or medical condition (including HIV, AIDS, and cancer), pregnancy (including childbirth), mental disability, ancestry, marital status, sexual orientation, gender identity, gender expression, military or veteran status, genetic information, or any similar protected category under applicable federal or state law. LACMTA is also committed to promoting environmental justice. LACMTA seeks to accomplish these goals by:

- Ensuring that the level and quality of transportation services are provided without discrimination based on a protected category;
- Adhering to and implementing LACMTA's Public Participation Plan;
- Preventing denial, reduction, or delay in access to LACMTA services and programs based on a protected category;
- Preventing changes to LACMTA services and programs that would inequitably and adversely affect minority or low-income populations; and
- Providing meaningful access to LACMTA services and programs to persons with limited English proficiency (LEP).

In addition to prohibiting discrimination based on any of the categories identified above, this policy prohibits retaliation for submitting a complaint of a violation of this policy or participating in a related investigation.

2.0 PROCEDURES

Any person who believes they were discriminated or retaliated against in violation of this policy may submit a written complaint to the Office of Civil Rights, Racial Equity & Inclusion (OCRREI). Persons with limited English proficiency, or those who require assistance preparing or submitting a complaint may contact Customer Relations in person or by phone. Contact information for OCRREI and Customer Relations is provided in Section 2.7 of this policy.

2.1 Reporting

The complaint should be submitted in writing within 180 days from the date of the alleged violation and include the complainant's name and signature. Complaint forms, though not required to be used, are available through Customer Relations or on the LACMTA website at <https://www.metro.net/CivilRightsComplaintForm>. Written complaints may be submitted to LACMTA Customer Relations or OCRREI.



Metro

CIVIL RIGHTS Civil Rights Policy

(CIV 5)

Any LACMTA employee who becomes aware of a discrimination or retaliation complaint should immediately contact the OCRREI for handling.

Complaints pertaining to race, color, or national origin discrimination may additionally or alternatively be filed with the Federal Transit Administration (FTA), Office of Civil Rights, Attn: Complaint Team, East Building, 5th Floor – TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590.

2.2 OCRREI Review Process

After a complaint is submitted to LACMTA Customer Relations or OCRREI, OCRREI will review the complaint to determine whether a violation of this policy is alleged.

If applicable, OCRREI will assign an investigator to conduct an investigation. If the Complainant has provided OCRREI with a mailing or email address, OCRREI will issue an acknowledgement letter informing the Complainant of the investigation. All complaints will be investigated promptly and handled in a sensitive manner. However, information and findings related to investigations may be disclosed on an as-needed basis.

In the event OCRREI is not the appropriate department to address a complaint, it will forward the complaint to the appropriate department for handling.

2.3 OCRREI Investigative Process

OCRREI will take the followings steps to investigate the alleged violation:

- Identify, request, and review all relevant information and documents; and
- Identify and interview parties with potentially relevant information.

2.4 Amended Complaints

An amended complaint may be submitted utilizing the same procedures described above. OCRREI will determine whether the amended complaint should stand on its own or be investigated as part of the original complaint.

2.5 Completion of Investigation

Upon completion of the investigation, a final investigative report will issue and the complainant and respondent will be notified of the investigative findings.



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CIVIL RIGHTS Civil Rights Policy

(CIV 5)

If no violation is found, the complainant may contact OCRREI to appeal the investigative findings based on new or additional information.

2.6 Implementation of Remedial Actions

If OCRREI finds a violation of this policy has occurred, LACMTA reserves the right to take appropriate remedial actions.

2.7 Contact Information

Customer Relations

Address: Plaza Level, One Gateway Plaza, Los Angeles, CA 90012

Email: CustomerRelations@Metro.net

Phone: 1.800.464.2111

Office of Civil Rights, Racial Equity & Inclusion

Address: One Gateway Plaza, Los Angeles, CA 90012 (MS: 99-19-2)

Email: EEODept@Metro.net

Phone: 213.418.3190

3.0 DEFINITION OF TERMS

Discrimination – Any act or failure to act that limits, excludes, or denies a person LACMTA services or benefits due to race, color, national origin, religion, sex, age (40 and over), physical disability or mental condition (including HIV, AIDS, and cancer), pregnancy (including childbirth), mental disability, ancestry, marital status, sexual orientation, gender identity, gender expression, military or veteran status, genetic information or any other protected category under applicable federal or state law.

Environmental Justice – Efforts made to prevent minority and low-income communities from being subject to disproportionate and adverse environmental effects.

4.0 RESPONSIBILITIES

OCRREI reviews all complaints under this policy and investigates where appropriate. OCRREI maintains a log of all complaints received. The log includes the date the complaint was filed; a summary of the allegations; the status of the complaint; and actions taken by LACMTA to resolve the complaint.



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5.0 FLOWCHART

Not Applicable

6.0 REFERENCES

Title VI of the 1964 Civil Rights Act

7.0 ATTACHMENTS

Civil Rights Complaint Form

8.0 PROCEDURE HISTORY

- 03/01/08 Policy memo.
- 01/08/09 Policy updated and revised into GEN 5 format template with the purpose of recognizing the importance of LACMTA's obligation regarding non-discrimination. Entire Procedure section revamped and streamlined to reflect current practices.
- 05/06/10 Policy updated to reflect administrative changes.
- 02/10/11 Revised to include protected classes sex, age and disability.
- 11/30/11 Policy renamed from Title VI Statement of Policy to Civil Rights Policy. Policy revised to reflect administrative changes. Updated § 6.0 References. Under References: added the Unruh Civil Rights Act of 1959 and removed the Limited English Proficiency Outreach Plan.
- 10/17/12 Added more protected classifications; changed responsibility from EEO Manager to the Manager of Civil Rights Programs; expanded the investigation process from 90 to 120 days; updated FTA Circular reference; added Environmental Justice definition; added complaint form attachment
- 08/01/13 Subsuming the Non-Discrimination in Providing Services (EO6) policy due to duplication.
- 12/05/13 Annual review: changed policy call letters from EO to CIV; added additional protections.
- 12/15/14 Annual review: non-substantive changes.



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Civil Rights Policy**

(CIV 5)

- 04/21/16 Annual review: non-substantive changes; updated titles and department name
- 04/24/17 Annual review: updated FTA's Office of Civil Rights address, and titles; the Chief Civil Rights Officer receives a copy of the final investigative report.
- 04/05/18 Annual review: updated the complaint form hyperlink.
- 04/22/19 Annual review: updated the complaint form hyperlink.
- 03/30/20 Annual review: non-substantive changes; updated titles and OCR mailing address
- 06/03/21 Annual review: non-substantive change
- 08/29/23 Annual review: non-substantive change
- 04/26/24 Annual review: various non-substantive changes; added prohibition against retaliation



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.

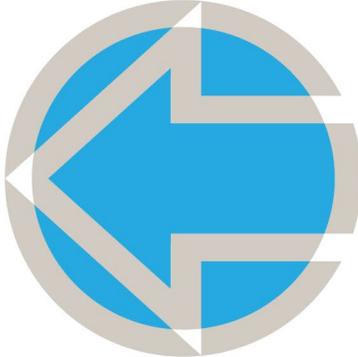
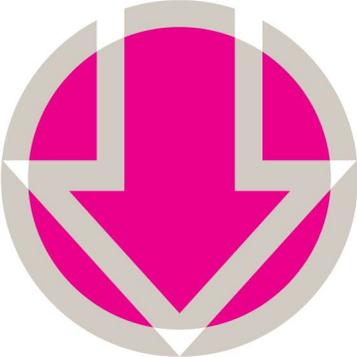
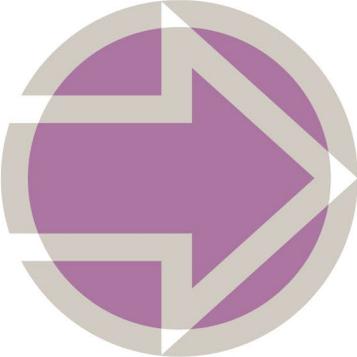
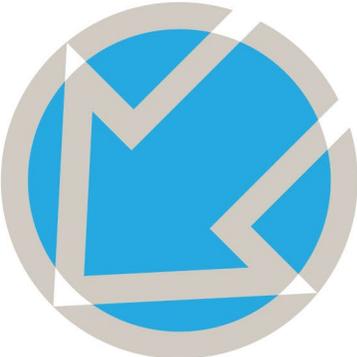
Complainant's Signature (Optional)

Date

ATTACHMENT B

Public Participation Plan

June 2025



Acknowledgements

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Attachment A – Vermont Transit Corridor Case Study

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Executive Summary

This Public Participation Plan (Plan) outlines the methods and procedures by which the Los Angeles County Metropolitan Transportation Authority (Metro) fulfills—and seeks to exceed—the requirements of the U.S. Department of Transportation (USDOT) related to public engagement. The Plan specifically addresses the following federal mandates:

- **Federal Transit Administration (FTA) Circular C 4702.1B**, which outlines responsibilities to Limited English Proficient (LEP) persons.
- **Federal Highway Administration (FHWA) Title VI program**, including Title VI 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.

Metro updates this Plan every three years to remain in compliance with federal requirements. Public input was solicited from **May 23, 2025, to June 23, 2025**, to ensure the Plan reflects current community needs and communication expectations. Comments received were used to refine the Plan and incorporate updated outreach strategies that reinforce Metro’s commitment to transparency, equity, and community-centered planning.

This Plan outlines Metro’s guiding principles, outreach strategies, data-driven methodologies, and coordination with advisory groups and community partners to deliver inclusive engagement. These efforts support Metro’s broader mission of providing accessible, equitable, and world-class transportation solutions for Los Angeles County.

As a result of the public comments received during the review period, updates incorporated into this final plan include:

- A new table illustrating the full menu of tools Metro uses to conduct outreach to the public (“Communication Toolbox”) in Chapter 6.
- Additional information throughout the document about how members of the public can access American Sign Language (ASL) and other ADA-compliant services.

1. Goals & Guiding Principles

This Plan guides Metro’s outreach efforts to gather public input on bus and rail service changes, new projects, fare adjustments, and other programs. As the system grows, Metro has a unique opportunity to strengthen LA County’s multimodal transportation network for a wide range of stakeholders. Meaningful, ongoing public participation helps Metro better understand and respond to local needs.

Exceeding FTA, FHWA, and Title VI requirements, the Plan reflects Metro’s mission and commitment to inclusive engagement. It emphasizes transparency, accountability, and building strong relationships across the county.

Recognizing that many non-English-speaking, Limited English Proficient (LEP), and low-income residents rely on transit, Metro prioritizes multilingual resources, flexible meeting options, innovative outreach, and participation tracking. These efforts are especially critical for people who walk, bike, or take the bus or train.

Metro also considers the needs of long-distance commuters, using proven tools such as station intercept surveys, media outreach, telephone town halls, and digital platforms to broaden engagement. The agency evaluates decisions through multiple lenses—including demographics, neighborhood context, marginalized communities, and people with disabilities—and uses participatory planning and popular education methods to make technical information more accessible. Flexibility remains key, enabling Metro to adapt outreach during emergencies such as the COVID-19 pandemic and the January 2025 wildfires.

1.1 Strategies & Methods

The strategies, methods, and procedures outlined in this document are integral components to the effectiveness of Metro’s Plan in meeting and exceeding federal guidelines. They are consistent with the letter of law and legislative intent of Title VI of the Civil Rights Act of 1964, Executive Order 12898 (Executive Order for Federal Agencies to address Environmental Justice in Minority Populations and Low-Income Populations) and FHWA’s Title VI program obligations.

Guidelines from FTA Circular 4702.1B, directing recipients on the responsibilities to integrate their programs and activities to include LEP (70 FR 74087, December 14, 2005), are also acknowledged by specific outreach activities defined in this section.

The strategies, overarching methods, and procedures summarized present comprehensive and targeted ventures customized to serve the public and meet federal law and guidelines. They also broaden the value of transit service through stakeholder access and deliberations.

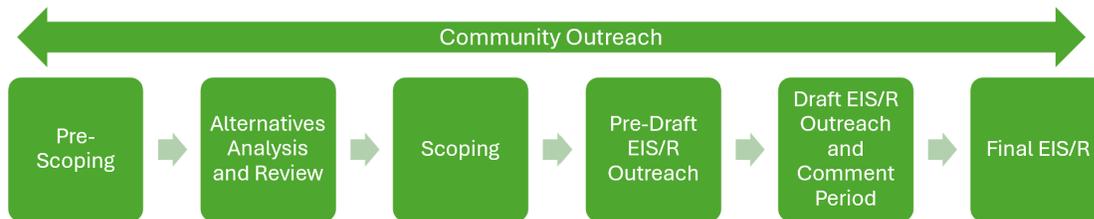
Metro’s charge is to develop strategic plans and implement methods to be consistent with Circular 4702.1B as follows:

- Ensure the level and quality of public transportation service provided in a non-discriminatory manner.

- Promote full and fair participation in public transportation decision-making regardless of race, color, national origin, sex, age, disability, religion, sexual orientation, gender identity, or other protected classes enumerated in federal and state laws.
- Ensure meaningful access to transit-related programs and activities for persons with limited English proficiency.

1.2 Strategies for Public Engagement

Public Outreach Milestones in the Environmental Process



Metro’s Plan offers a range of accessible communication platforms to engage the public and facilitate meaningful dialogue with staff on operations and proposed projects. These platforms support both broad outreach and targeted interactions, helping reach a wide and diverse audience.

The following strategies support ongoing public involvement in decision-making for regional and local plans:

Convene an advance-planning team—including technical planners, data analysts, and outreach specialists—to identify potential stakeholder concerns early.

- Utilize additional data resources, beyond Metro’s LEP Four Factor¹ sources, to enhance outreach planning for diverse socioeconomic communities.
- Advance environmental justice by including staff with cultural, linguistic, historical, and local knowledge to develop best practices and reduce participation barriers.
- Partner with community leaders, government agencies, and Community-Based Organizations (CBOs) to identify and address communication challenges.
- Recognize CBOs as vital to Metro’s service network and ensure equitable processes for engaging them in professional services.
- Work with civic and grassroots leaders to improve local information-sharing efforts.

¹ [Four-Factor Analysis for Limited English Proficiency](#), CA Dept of Housing and Urban Development.

- Use demographic data and community feedback to develop communication strategies—such as multilingual and sign language resources—that ensure equitable access to project information from start to finish.
- Conduct outreach activities to inform communities about projects and prepare for formal public hearings.
- Create feedback loops that allow for early public comment and integration of input into ongoing planning.
- Allow sufficient time for public review and response during engagement periods.
- Use digital tools—websites, videos, and social media—while ensuring people with limited internet access receive the same information through alternative channels.
- Evaluate engagement efforts through public feedback and metrics to improve future outreach.
- Customize outreach approaches based on each project’s goals and target audience.

1.3 Methodology

As part of our public outreach process, Metro uses a variety of tools to engage the public in dialogue and activities. This often includes creating advisory groups with diverse civic, community, and government representatives directly and indirectly affected by proposed projects or service changes (See Chapter 3). In other cases, we disseminate project information through written notices and our network of community-based partners.

Engagement is tailored to the diverse population of Metro’s stakeholders, regardless of income, housing status or ability. We offer meaningful access by providing interpreters and translating materials into appropriate languages, and we adapt media communications to increase participation.

2. Metro’s LA County Stakeholders

With over 9.8 million residents, LA County is the most populous county in the nation, accounting for approximately 27% of California’s total population. Its 88 incorporated cities and 4,084 square miles span a diverse topography, including mountain ranges, wetlands, deserts, and coastal areas, making it a uniquely distinct region. Metro considers all who reside, work, and travel within LA County to be stakeholders of the agency.

Residents, institutions, businesses, community-based organizations, and the elected officials who represent them play a crucial role in public participation, planning, and outreach. Communication with the public is an ongoing process to inform and receive input on service levels, fare changes, studies, planning documents, environmental assessments, project planning, construction, and transit safety education.

2.1 Demographic and Linguistic Diversity in LA County

The 2019-2023 American Community Survey (ACS) five-year estimates show a total population of 9,848,406 for LA County. Data on languages spoken in Metro’s service area is gathered from multiple sources. Of the 9,329,609 people who are at least five years old, an estimated 2,164,190 people, or 23.2%, speak English less than “very well.” Metro uses the term Limited English Proficiency (LEP) to describe this demographic.

The table below shows the breakdown of those languages for Los Angeles. Maps included in the 2019 Factor One LEP Analysis show concentrations of LEP groups by language within LA County, especially within the City of Los Angeles, and will be utilized for targeted customer outreach in those languages.

Race / Ethnicity / Income /Persons with Physical Disabilities in LA County in 2023

RACE/ ETHNICITY	
African American/ Black (not Hispanic or Latino)	7.4%
American Indian/ Pacific Islander	0.4%
Asian alone	15.4%
Hispanic or Latino	48.4%
White (not Hispanic or Latino)	24.6%
Two or more races/Other	3.8%
INCOME	
Median household income (dollars)	\$86,587
Per capita income (dollars)	\$43,478
Percentage of households who do not own a car	9.02%
Percentage of families and people whose income in the past 12 months is below the poverty level	13.58%
TOTAL CIVILIAN NONINSTITUTIONALIZED POPULATION WITH DISABILITY	
People with vision difficulty	2.3%
People with hearing difficulty	2.7%
People with ambulatory difficulty	6.1%

Source: U.S. Census Bureau, 2023 American Community Survey

Metro is charged with developing a strategy and implementing a public access practice that informs and engages distinct socio-economic communities within LA County. Metro gauges what outreach methods will be most meaningful, pragmatic, and cost-effective based on information gathered in LEP community surveys and other public comments.

This information ensures engagement for all stakeholders, including LEP, minority, low-income, and disabled individuals, regardless of gender, sex, or age. It blends traditional outreach with evolving technologies for effective communication.

Metro recognizes that many communities lack consistent access to the internet and social media. Therefore, each public participation plan assesses the best ways to communicate with low-income, LEP, and minority communities while incorporating outreach methods for people with disabilities, hard-to-reach groups, and the public. This approach ensures broad and meaningful participation.

Technology enables Metro to receive immediate feedback and assess engagement effectiveness. This feedback provides performance insights, as well as both qualitative and quantitative data which help refine outreach strategies and long-term planning.

2.2 Service Area & Agency Functions

- As of March 2025, Metro operates daily service with a fleet of 2,050 buses serving 11,912 stops. Our 118 bus routes cover 1,447 square miles of bus service area with 753,249 average weekday boardings in March 2025 (compared with 871,486 pre-COVID boardings in February 2020).
- Metro provides 109 miles of light and heavy rail service to 107 stations provided by 437 heavy and light rail cars.
- In March 2025, Metro trains carried an average of 203,343 weekday boardings (compared to 321,444 pre-COVID boardings in February 2020) putting the total number of combined bus/train weekday ridership at over a million riders a day.
- Metro saw 26.5 million total boardings (bus + rail) in March 2025 (versus 31.8 million boardings in March 2019 (pre-COVID)).
- Metro ExpressLanes operates 50 lane miles on the I-10 and I-110 corridors. These lanes carried 40 million annual trips in the past year.
- Metro has built 20.7 miles of soundwalls since 2000 to grant privacy and reduce noise pollution in impacted communities.
- Metro Bike Share operates at more than 225 stations systemwide. As of December 2024, Metro Bike Share has been responsible for over 2.5 million trips and over nine million miles traveled.
- Metro also provides the Freeway Service Patrol, a congestion mitigation program managed in partnership with Metro, California Highway Patrol (CHP) and Caltrans which assists motorists on all major freeways in LA County. The largest of its kind in the US, the patrol serves 475 miles of freeway and assists 25,000 motorists monthly resulting in an estimated annual emissions reduction of 150 million kg of CO₂.
- Metro Micro, an on-demand rideshare service, operates 85 vehicles in eight different service zones across LA County. As of December 2024, the service had provided 2,343,191 total trips.
- Metro plans, funds, constructs, and operates public transportation for the benefit of LA County's population.
- Metro is accountable for distributing information to residents in the 88 incorporated cities and unincorporated areas about our projects and services, honoring the diverse racial, linguistic and cultural characteristics of its people.
- The remainder of Southern California's surrounding counties add more than 11 million residents to comprise a greater regional population totaling over 21 million.
- Below is the racial composition of LA County²:
 - African American/ Black 7.4%
 - Asian 15.4%
 - Native American/ Pacific Islander 0.4%
 - Hispanic or Latino 48.4%
 - White 24.6%

² 2024 American Community Survey (ACS) data)

- Other 3.8%

Additionally, 32 languages, each with multiple dialects, are spoken by at least 1,000 residents in LA County.

3. Metro's Equity Platform

Since adopting the Metro Equity Platform Framework in 2018, community-based organizations have emphasized the need to integrate all lived experiences into public participation. The framework's four pillars guide Metro's efforts to ensure that all community members' voices are heard, starting with understanding and addressing barriers to access. The four pillars are:

- Define and Measure
- Listen and Learn
- Focus and Deliver
- Train and Grow

While all pillars are utilized in the outreach process, the second pillar, "Listen and Learn," epitomizes Metro's approach and is the most critical for the purposes of this Plan. It acknowledges that progress moves at the speed of trust. To build trust, Metro engages communities through intentional listening and meaningful participation that leaves them feeling heard, respected, and represented.

Metro is committed to a robust and transparent process that empowers low-income communities, communities of color, people with disabilities, and other marginalized groups by removing barriers to influence and decision making.

3.1 Community-Based Organization (CBO) Partnering Strategy

Community-based organizations (CBOs) are integral to Metro's service network and policy efforts. In 2021 the Metro Board of Directors adopted a CBO Partnering Strategy that establishes a consistent process for engaging them in professional services. This strategy improves internal efficiency and strengthens partnerships by providing clear parameters for collaboration, leading to cost savings and deeper relationships based on trust and mutual respect.

As the cornerstone of this strategy, in 2023, Metro launched the [CBO Database](#), a one-stop portal for Community Based Organizations (CBOs) to register and explore partnership opportunities. As of early 2025, there are 340 registered CBOs in the database who can connect with Metro for contracts in community engagement, research, and other aligned projects. Metro teams also use the database to identify potential collaborations as new initiatives emerge.

3.2 Minimum Baseline Thresholds for Public Outreach

Metro encourages public participation at every stage of a project, program, or initiative—from planning to implementation. This includes policy changes, such as adjustments to bus and rail service, fares, and programs, as well as the development, planning, and construction of bus, rail, highway, and transit-oriented community projects.

To align with its Equity Platform, Metro sets minimum baseline thresholds for outreach, prioritizing historically marginalized communities, including people of color and low-income residents. Outreach strategies are tailored based on community characteristics, the stage of a project, prior Metro activity in the project area, and other relevant factors. As the agency serving the nation's most populous county, Metro seeks to maximize access to information and input opportunities within budget constraints, with

a focus on current and prospective riders and those disproportionately affected by transportation decisions.

Key Outreach Priorities:

Transit Riders: Metro prioritizes rider input, as they have direct experience with services, routes, and improvements. Annual surveys show that transit riders are more likely to be low-income, people of color, or have limited transportation options, making their voices crucial in shaping service updates and expansions.

Equity-Focused Communities (EFCs): Metro identifies EFCs—[areas](#) with high concentrations of low-income residents, people of color, and limited vehicle access—to guide outreach efforts. These communities have the greatest mobility needs, and Metro works to ensure their perspectives are included in decision making.

Corridor Representation: Using demographic data, Metro profiles impacted areas to set outreach targets, ensuring EFCs and high-need communities have a voice proportional to their presence in the area.

The matrix below details each minimum baseline threshold for Metro-hosted public meetings relative to noticing, venues, times, and language:

Outreach Method Examples	Description
Community Meeting and Public Hearing Noticing	<ul style="list-style-type: none"> Stakeholders will receive at least 10 days’ notice for all Metro-hosted community meetings and public hearings. Notices will be provided in English and Spanish, with additional translations as needed. Whenever possible, ads and notices will be placed on nearby buses and trains. Meeting materials will be posted online, and meetings may be shared via webcasts, webinars, and other digital platforms.
Community Meeting and Public Hearing Locations and Times	<ul style="list-style-type: none"> Metro-hosted meetings and public hearings will be held at ADA-compliant, transit- and bike-accessible venues near relevant communities, including faith- and community-based institutions. Meetings will be scheduled at convenient times, including evenings and weekends, to accommodate stakeholders.

Outreach Method Examples	Description
Community Meeting Language Translation	<ul style="list-style-type: none"> • Meeting materials and live translation will be provided in English and other languages spoken by significant populations in the project area, as outlined in Metro’s Limited English Proficiency Plan Four Factor Analysis³ (discussed at length in Section 4.1), and as resources allow. • Translation will be performed by fluent speakers. • Additional languages will be provided upon request with at least three working days’ notice (72 hours) by calling 323.466.3876.
Public Hearing Language Translation and Documentation	<ul style="list-style-type: none"> • Public hearing materials and live translation will be provided in English and Spanish at a minimum. • ADA accommodations (ASL, large print or Braille materials) will be provided upon request within 72 hours notice by contacting Metro’s ADA Department at 213-922-6919 or by email at accessibility@metro.net. • Attendees can also request modified meeting procedures such as extended speaking time if they have difficulty communicating during public comment due to a disability. • Language translation will be performed by fluent speakers. • Court reporters will document the hearing proceedings and public comments.
Neighborhood/Community Lenses	<ul style="list-style-type: none"> • Metro will look at community decision-making processes through several lenses, including neighborhood and community venues, LA County community structures, urban and rural areas, and ethnic and cultural groups. • Emphasis will be given to include perspectives from those who are under-represented, with limited education attainment, and/or with disabilities.
Innovation	<ul style="list-style-type: none"> • Whenever possible, Metro will use participatory planning tools (such as interactive maps, renderings, and activities), real-life examples, CBO partnerships, and other digital tools to increase awareness and understanding of complex technical details.

³ [Limited English language proficiency plan: 4 factor analysis](#), Metro, updated 2013.

Outreach Method Examples	Description
Online Language Translation	<ul style="list-style-type: none"> • The website metro.net provides web visitors with transportation information assistance in seven languages, in addition to English. • Additionally, Metro offers Google Translate on every webpage for language accessibility, exceeding Title VI requirements. • Metro’s website content is ADA-accessible and compatible with screen-reading devices for individuals with visual impairments.
Telephone Interpretation	<ul style="list-style-type: none"> • Metro’s Customer Care Department provides customers with limited English proficiency transportation information assistance in over 200 languages through a third-party language interpretation service. • Telephone interpretation is also ADA accessible. Metro’s Customer Service line coordinates with California Relay Line “711” service. • In addition to Customer Care, Metro Rail Operations utilizes third-party languages interpretation services via communication devices (G-Tel, P-Tel, and E-Tel) located on rail platforms to provide information and emergency response to LEP customers who contact the Rail Operations Center.

3.3 Public Participation Plans for Individual Studies and Initiatives

Metro develops tailored outreach and engagement strategies for each study or initiative, ensuring meaningful dialogue and broad public access throughout the decision-making process. These strategies often exceed baseline requirements through customized Public Participation and Communications Work Plans.

To support state and federal sustainability goals and align with its Short- and Long-Range Transportation Plans, Metro conducts over 30 studies across LA County. These studies evaluate impacts on transit, highways, and local roads, assessing vehicle miles traveled (VMT), air quality, mobility, and access for pedestrians and cyclists. All efforts comply with CEQA, NEPA, and incorporate the Four Factor Analysis.

Participation methods are customized to each study’s scope, location, and communication needs. Many projects feature dedicated websites and use social media and other digital platforms to reach stakeholders.

4. Implementation of the Guiding Principles: An Integrated Team for Stakeholder Engagement & Continuity

Given its broad responsibilities and countywide reach, Metro has developed expertise in tailored outreach and public participation for each project, while maintaining ongoing stakeholder relationships. This commitment is supported by specialty teams under Metro's Customer Experience Department:

- Community Relations
- Arts and Community Enrichment
- Customer Care
- Customer Programs and Services
- Strategy and Programming

Metro's Customer Experience Teams ensure the agency's connectivity with stakeholders on daily issues, operations, studies, initiatives, and construction impacts. Public participation is also supported by five sub-regional Metro Service Councils, an Accessibility Advisory Committee, a Community Advisory Council, a Technical Advisory Committee, and other advisory committees that guide various Metro programs and initiatives.

4.1 Community Relations

The Community Relations Unit has several teams leading public participation in focused areas that include:

- Local Government Relations
- Countywide Initiatives
- Planning and Project Delivery

Local Government Relations

This unit connects Metro with all 88 cities and unincorporated areas of LA County. Local Government Relations (GR) staff build relationships with grassroots organizations, local governments, Councils of Governments, businesses, Metro Service Councils, and other stakeholders to support public engagement for Metro's operations, planning studies, projects, and initiatives.

Local GR serves as a resource to city officials, chambers of commerce, faith leaders, institutions, and community organizations, sharing information about Metro's work through public meetings, presentations, hearings, city council sessions, and other events.

The team works closely with the Planning and Environmental Communications teams, with some staff serving across functions. Team members are assigned to geographic subregions or program areas to maintain strong local connections.

Countywide Initiatives

The Countywide Initiatives team leads key engagement platforms such as the Metro Faith Leaders Roundtable, Markets at Metro, and otherwise initiatives across the county that gather stakeholder input and ensure community voices inform Metro’s work. By fostering meaningful connections, the team empowers diverse perspectives to influence transportation efforts that reflect the needs of LA County residents.

Countywide Initiatives also supports outreach for service changes and operational updates, helping keep communities informed and involved. The team facilitates the Citizens Advisory Council and Public Safety Advisory Committee and acts as a vital link between Metro and the public, promoting equitable and effective engagement across the county.

Planning & Project Delivery

This team is comprised of three units:

- Planning and Environmental Communications
- Project Delivery & Construction Relations
- Mitigation Programs

Planning and Environmental Communications (PEC)

The Planning and Environmental Communications (PEC) team designs and delivers community engagement programs for Metro Planning, Highway, Regional Rail, and Active Transportation projects in the planning phase.

In alignment with Metro’s Public Participation Plan and CBO Partnering Strategy, the PEC team ensures inclusive and equitable outreach across LA County. It also manages public participation for CEQA and NEPA environmental review processes, guiding projects through key milestones and delivering engagement activities on time and within budget—from environmental planning through engineering and construction—helping to minimize schedule risks.

Project Delivery & Construction Relations

Once a project enters construction, the Project Delivery & Construction Relations teams manage public outreach, informing stakeholders about project benefits, construction activities, and mitigation measures identified during environmental review. Drawing on early planning insights, the team implements field strategies to support communities during construction and works within the Integrated Project Management Office (IPMO) alongside Project Management and the contractor.

Established by Metro’s Board in July 2013, the Construction Relations program sets the standard for managing construction impacts across transit and highway projects. It leads outreach, stakeholder communication, and mitigation efforts to ensure clear, consistent messaging and minimize disruptions to businesses and residents.

Public engagement includes multilingual community meetings tailored to local demographics, and outreach methods are adapted to provide timely updates ahead of major milestones, detailing activity type, hours, duration, access changes, and potential impacts.

The team uses a mix of traditional and digital tools, such as notices, email blasts, newsletters, social media, project websites, and door-to-door distribution. Additional support includes a 24/7 hotline and a dedicated email response team. Since the pandemic, the team has adopted a hybrid model, offering both virtual and in-person meetings.

Mitigation Programs

The Mitigation Programs team manages Eat, Shop, Play (ESP), which promotes businesses in construction zones. For over a decade, Metro has supported local businesses through marketing, and this year ESP adds free digital marketing courses and Metro-sponsored promotions to boost visibility and encourage patronage.

The team also supports two other programs: the Business Interruption Fund (BIF), providing financial aid to small businesses affected by rail construction, and the Business Solution Center (BSC), offering free coaching, planning, marketing, and capital resources. Together, these reinforce Metro's commitment to the community.

Additionally, the team oversees community-led leadership councils formed to support project construction, including Community Leadership Councils (CLCs), which advise Metro on outreach and engagement during construction.

4.2 Arts & Community Enrichment

The Metro Arts & Community Enrichment department delivers public art programs, exhibitions, cultural initiatives, public tours, educational programs, rail safety efforts, the Youth Council, and the Docent Council. It fosters connections between people, neighborhoods, and destinations in support of Metro's vision for World Class Transportation for All.

The Unit is comprised of three focus areas:

- Metro Art
- Rail Safety Education
- On The Move Riders Program

Metro Art

As the County's arts connector, Metro Art provides access to arts and culture for the agency's diverse ridership. The program "Percent for Art" funds projects and arts programs that uplift and reflect the needs and values of communities served. Metro Art staff lead regular technical assistance initiatives to increase opportunities for artists at all stages of their careers. Community engagement utilizing innovative arts and cultural strategies is a longstanding foundation of this program. The department has partnered with numerous community-based arts organizations and continues to place community voices at the forefront.

Rail Safety Education

Metro's Rail Safety & Mobility Programs unit promotes rail safety through education, site-specific presentations and Rail Safety Orientation Tours. Additionally, Rail Safety Advisors conduct safety training at new grade alignments as part of CPUC (California Public Utilities Commission) requirements. It also offers travel training for older adults, student field trips, and facilitates the Youth Council. Serving diverse communities within 1.5 miles of at-grade rail lines, the team ensures outreach efforts address disparities and prioritizes equity-focused communities.

On the Move Riders Program (OTMRP)

On the Move Riders Program (OTMRP) empowers older adults with the information and confidence to travel on fixed-route transportation by providing one-on-one and/or group travel training, transit tours, and workshops. Through regional Older Adult Transportation pop-up events and the Countywide Older Adult Transportation Expo, OTMRP strives to spread the word on the program and the value in learning how to travel on public transportation. Through these efforts, OTMRP strives to remove barriers and enhance mobility among the older adult population.

4.3 Customer Care

Metro's Customer Care Department serves as the primary communication link for ensuring timely and accurate responses to customers' travel inquiries, complaints, concerns, and requests for assistance. The department's goal is to provide exceptional customer service and support for a variety of customer needs.

The Customer Care Unit is comprised of several teams whose primary focus is to serve the needs of our customers.

- Customer Information Center
- TAP Information Contact Center
- Customer Relations

Customer Information Center

The Customer Information Center handles approximately 1.1 million customer calls annually through 323.GOMETRO (323.466.3876), offering trip planning, route guidance, schedule details, fare information, and transit assistance seven days a week. Services are available in multiple languages.

The center maintains transit data for 70 transit agencies across Los Angeles, Ventura, Orange, Riverside, and San Bernardino counties, ensuring that accurate information is uploaded to the Metro Trip Planner, an online resource to help riders plan their trips. It also operates the Historical Union Station Information Booth, providing in-person transit information to Union Station patrons.

TAP Information Call Center

The TAP Information Call Center addresses regional TAP card-related customer inquiries via phone, email and in person. Assistance is also available online at www.taptogo.net. The center supports services for 25 local transit agencies, including Metro.

Customer Relations

Customer Relations receives, tracks, and investigates customer comments, complaints, inquiries, and suggestions submitted through phone, email, online platforms, written correspondence, and walk-ins. This department offers services in seven languages to ensure that all members of the public can learn about Metro services in their own language.

The department forwards inquiries to the appropriate teams for further investigation and resolution as needed, ensuring a timely response. Additionally, Customer Relations manages the customerrelations@metro.net email inbox and operates the agency's switchboard during weekdays.

4.4 Customer Programs and Services

Customer Programs and Services supports regional programs and services by providing fare media sales and pre-screening Reduced Fare and LIFE (Low-Income Fare is Easy) applications at five Metro Customer Center locations.

The Reduced Fare Program processes applications for seniors, people with disabilities, and students, ensuring fair access to public transit within Los Angeles County. Customer Programs and Services also leads the stockroom operations, delivering TAP fare media to over 400 third-party TAP vendors. The department oversees Lost & Found, managing the inventory and return of items found on Metro buses and trains.

Metro GoPass

The Metro GoPass is a free transit pass for students, allowing access to Metro buses, trains, and participating transit agencies. Eligible students from registered schools receive a TAP card and activation code from their school, which they can activate online, by phone, or via a virtual TAP card on the TAP LA app.

Low Income Fare is Easy (LIFE Program)

LIFE is a discount fare program to reduce the cost of transit for low-income riders. Discounts are applied toward the purchase of weekly and monthly transit passes on Metro and other participating transit agencies in LA County, or toward a 20-ride pass for use on any one of the participating agencies. This team also operates the Mobile Customer Center, which travels to special events, senior centers, and schools to sell fare media and pre-screen Reduced Fare applications.

Metro Customer Center Locations

Metro operates five different customer center locations throughout LA County. These customer center locations are strategically placed in high-need communities where many residents are transit-

dependent. One center is in Metro's Headquarters at Union Station, and the other four are in the Baldwin Hills, East Los Angeles, Willowbrook, and Koreatown neighborhoods.

4.5 Strategy & Programming

The Strategy and Programming team leads Metro's efforts to deliver targeted, timely, and unbiased communications for capital projects and initiatives. Guided by a strategic framework, the team develops and manages digital campaigns, messaging roadmaps, and email workflows aligned with regional priorities and agencywide goals. Their tactics include segmented email outreach, lifecycle messaging, Salesforce-driven project updates, Customer Relationship Management (CRM) data integration for refined targeting, and collaboration with Community Relations to craft persuasive content. By focusing on stakeholder needs and platform performance, the team ensures Metro's messaging is proactive, consistent, and accessible.

Their measurable outcomes target increased reach, engagement, and action. Key metrics include email open and click-through rates, project website traffic growth, and higher stakeholder participation after outreach. Supporting tactics include A/B testing of subject lines and visuals, automating recurring content like newsletters, and real-time campaign tracking. They also analyze engagement data by region and stakeholder type to improve message relevance and response rates across Metro's diverse audiences.

This approach supports the Plan's emphasis on transparency, early engagement, and culturally competent outreach. The team implements multilingual messaging, tailored engagement workflows for Environmental Review and CEQA milestones, and aligns digital tools with outreach timelines. Their work enables field teams to provide accurate, consistent updates, helping Metro meet participation goals at scale. By combining strategy with actionable tactics, Strategy and Programming fulfills the agency's commitment to informed, inclusive public engagement.

4.6 Metro Advisory Groups

Metro further enhances public participation via several non-elected planning and advisory committees, which offer important guidance and leadership on a variety of Metro projects, programs, and subject-area initiatives. Advisory bodies voluntarily provide input to Metro on programs, projects, and other initiatives.

Advisory Body Compensation Policy (ABCP)

In September 2021, the Metro Board approved an Advisory Body Compensation policy (ABCP) that was spearheaded by the Office of Equity and Race. ABCP determines if and when members of the public who serve on Metro advisory bodies can be compensated.

The ABCP has three categories for compensation: 1) Advise, 2) Advise and Prepare, and 3) Advise and Collaborate. The level of responsibility, time commitment, and roles of the advisory member increase with each tier, along with the compensation rate, as described below:

Advise: Applies to advisory bodies that largely play the role of an advisor for Metro staff with minimal responsibilities outside of attending meetings.

Advise and Prepare: Applies to advisory bodies responsible for one to two hours of advance preparation for meetings on top of attending meetings.

Advise and Collaborate: Applies to advisory bodies whose responsibilities include collaboration with other members, Metro staff, and/or other community members or external partners, to develop a shared vision and outcomes. The Advise and Collaborate tier should be applied when advisory members have a moderate to significant workload outside of advisory committee meetings.

All members of the public are eligible for ABCP regardless of immigration status, housing status, ability, or any other status that may be a barrier to participation. Compensation alternatives are available to accommodate advisory body members who may not be able to accept compensation for a variety of reasons in the form of a check or direct deposit. The Policy excludes Metro employees and any public agency, Councils of Governments, or elected officers (except for elected officials on serving councils) and their staff who serve on advisory bodies as part of their professional role.

Metro Advisory Body Compensation Structure				
Compensation Type	Regular Compensation Rate	Maximum Compensation Per Fiscal Year	Alternate Rate	Maximum Compensation Per Fiscal Year
Advise	\$100/Meeting	\$3,100	\$75/Meeting	\$2,500
Advise and Prepare	\$150/Meeting	\$4,300	\$125/Meeting	\$3,700
Advise and Collaborate	\$200/Meeting	\$5,500	\$175/Meeting	\$4,900
Subcommittee Participation	\$50/Meeting	\$1,200	\$50/Meeting	\$1,200

Note: CPI annual increases can occur

Current Advisory Bodies

The **Accessibility Advisory Committee (AAC)** is facilitated by the Office of Equity and Race and meets on the second Thursday of February, March, May, June, August, September, November, and December. Meetings are held in person at Metro Headquarters as well as online via Zoom and by telephone.

The purpose of the AAC is to provide feedback on accessibility-related issues regarding Metro's programs, services (including over 200 bus and rail routes) and facilities, which must be fully accessible to all customers, including those with disabilities. AAC members are encouraged to disseminate information they obtain to other members of their community. Agendas are available in alternative formats upon request; live captioning and language interpretation are provided at every AAC meeting.

The **Community Advisory Council (CAC)** was authorized by the state charter as an advisory body of community representatives from throughout the region to consult, obtain, and collect public input on matters of interest and concern to the community, and communicate recommendations to Metro. Every active/voting Metro Board member may directly appoint up to four members to the CAC.

The CAC voted to informally be referred to as the "Community Advisory Council" (CAC), even though it is legislatively identified in Public Utility Code §13000 et seq. as the "Citizens' Advisory Council."

The **Technical Advisory Committee (TAC)** was state mandated in 1977, and Metro's Planning Department oversees the group. It has undergone periodic reviews of its membership, functions, and responsibilities based on the changing needs of Metro; however, its role remains relatively unchanged.

The TAC reviews, evaluates and comments on various transportation proposals and alternatives within LA County. Transportation issues heard by the committee include the funding, operation, construction, and maintenance of bus and rail transit, streets and freeways, demand and system management, accessibility for people with disabilities, air quality improvements, goods movement, sustainability, and active transportation.

The committee is currently composed of 58 voting and non-voting members representing agencies throughout LA County. The TAC includes four subcommittees: Bus Operations Subcommittee, Local Transit Systems Subcommittee, Streets and Freeways, and Transportation Demand Management (TDM)/Sustainability.

The **Transportation Business Advisory Council (TBAC)** was established by state law in 1992 and is staffed by Metro's Diversity & Economic Opportunity Department (DEOD). It is comprised of professional business associations representing an array of industries and trades to advise Metro on matters regarding the disadvantaged business enterprise program to enable the authority to meet or exceed women and minority business enterprise participation goals. TBAC plays an important role in advocating for small business owners to have increased access to Metro contracting opportunities.

The **Policy Advisory Council (PAC)** was established in early 2017 to review, comment and provide input on the draft Measure M Master Guidelines, the Long-Range Transportation Plan (LRTP), and other work plans and policy areas that the Metro Board may request. The PAC meets on an ad-hoc basis and annually before adopting Metro's Fiscal Year budget to advise on Metro's priorities for the region, including improved mobility for all stakeholders.

The **Public Safety Advisory Committee (PSAC)** was established by the Metro Board in June 2020 in response to growing safety concerns on public transit. The committee was created to address rising crime rates, passenger safety, and public perceptions of safety on Metro trains, buses, and stations. This initiative is part of Metro's broader effort to improve security and enhance rider experience while also engaging communities to explore innovative solutions for reimagining public safety. The PSAC provides feedback on non-law enforcement alternatives, such as Metro's Ambassador Program.

The committee meets monthly and is comprised of 15 diverse voting members throughout LA County. Committee members have expertise in areas such as transit access, social services, homelessness, mental health, public safety, and law enforcement. Metro is committed to ensuring that the perspectives of older adults, youth, and women are represented on the committee.

Metro's Youth Council is a one-year program for members aged 14 to 17 from communities across LA County. During their term, members help Metro achieve key goals: listening to youth concerns and ideas, engaging future community leaders, increasing awareness of Metro, empowering young people to share their voices in transportation decision making, and fostering lifelong Metro riders.

Metro's Sustainability Council aims to improve sustainability efforts by developing targets, metrics, and strategies to assist Metro in achieving stated sustainability program goals. The council advises in the development of Metro's sustainability goals, establishes targets and performance measures, and assists in the tracking and reporting on a quarterly as outlined in [Motion 57's](#) four major categories:

- Climate Change & Resiliency
- Energy
- Solid Waste & Recycling
- Water

The council also aims to improve the understanding of our constituents and stakeholders of the sustainability-related efforts and opportunities at LA Metro.

Latinx Working Group

To ensure culturally relevant communication with the largest non-English-speaking demographic in Los Angeles County, Metro's Customer Experience Department established the Latinx Working Group in 2023. This group meets monthly and consists of Metro employees from various units, including Marketing, Community Relations, Media Relations, Arts + Community Enrichment, Customer Experience, and Customer Care.

The Latinx Working Group plays a critical role in ensuring Metro's external communications align with the agency's policies. The group advises on communication campaigns and develops Spanish-language content that resonates more effectively with this audience.

4.7 Metro Service Councils

To continuously address Metro bus and rail service concerns in the communities they serve, the Metro Board established five subregional Service Councils in 2002. The service councils are staffed by Operations personnel with participation from Local Government Relations.

Councilmember nominations are made by the region's designated nominating authorities. These include local cities, Councils of Government (COGs), the City of Los Angeles Mayor's Office, and four of LA County Supervisor Offices. Nominations must be approved for appointments by the Metro Board of Directors. As a condition of membership, councilmembers must live, represent, or work in the communities within the boundaries of their designated region.

These councils meet monthly to gather public input on Metro service, review and recommend service changes, receive presentations on all agency initiatives, and meet quarterly with the agency's CEO.

All service council meetings are publicly noticed in accordance with the Brown Act, and public participation is strongly encouraged. Meetings are held in a hybrid in-person and virtual format to maximize participation. Staff coordinate real-time streaming of meetings, as well as accepting comments submitted via email and online. Meeting locations are all accessible by Metro transit.

5. Meetings

When considering the appropriate times and places for public meetings, Metro creates events and schedules meetings to maximize participation of diverse groups. These include minority, college age, seniors, disadvantaged, low-income, LEP community members and individuals with disabilities on varied work and family schedules. Meetings are publicized in multiple languages through postal mailers, e-mail, websites, door-to-door canvassing, and via social media sources, including Facebook, X, and NextDoor.

5.1 Meeting Locations & Structure

Meeting venues are selected based on several criteria:

- Room size (selected to accommodate anticipated attendance and ADA requirements)
- Room layouts that help facilitate dialogue, input, and accessibility
- Technology infrastructure for presentations or multilingual communication
- Hours of operation of facility coincide with nearby transit service hours to ensure transit-dependent community's attendance
- Geographic location within impacted or hard-to-reach stakeholder communities for convenience and comfort of dialogue
- Neutrality of venue – choosing community centers with social, recreational and educational purposes.

Spanish is the most commonly spoken non-English language in the Metro service area and is offered at every Metro-hosted public meeting. Fact sheets and handouts are regularly translated based on demographic analysis. Multilingual communications are provided as needed or required in various communities. ADA accommodation, such as sign language interpreters, is available upon request if staff receive notice at least three working days before the event. Information is also provided in large print and Braille when requested.

5.2 Meeting Types

Metro values direct interaction with community members. The following are the types of meetings Metro hosts to garner community input:

- Legally required scoping meetings and public hearings introduce the public to the proposed projects and plans. At these meetings, Metro staff present anticipated ongoing activities, provide ways to engage and follow the project, and document comments and concerns from the public.
- Meetings are translated as required, given demographic and LEP factors. Collateral materials are also developed and distributed when required to facilitate dialogue and increase public engagement.
- Workshops and briefings are held to update stakeholders and resolve new or ongoing issues.
- Advisory committees/roundtables among constituents at the grassroots level offer input and resolution to issues/mitigations.
- Community meetings are provided for projects in various development phases, including during pre-planning, planning, pre-construction, construction, and operations. They are also

hosted to communicate information and gather feedback for other Metro-related programs and initiatives. Participants include local civic, business, and community-based organizations, elected officials, and the public.

- Pop-up events are utilized for Metro staff to provide project information and gather input from stakeholders at local community events, such as festivals, conferences, and holiday gatherings.
- Community tours are designed and hosted by Metro staff to provide stakeholders with an experiential learning opportunity to better understand Metro programs. These could include proposed projects, construction activities, Metro's extensive art program, transit safety, or other initiatives.
- One-on-one and group briefings are conducted with community leaders, elected officials and staff, and individual stakeholders on an as-needed basis.
- Specific design meetings engage the public by introducing technical considerations and offering solutions to potential impacts or present design opportunities.
- Community relationships are enhanced through the established various Metro advisory bodies, Metro Service Councils discussed in section 3.6.1.

5.3 Public Meeting Notice-Delivery System

Metro employs a multi-channel approach to ensure public meeting notices effectively reach all stakeholders. A well-coordinated delivery system provides timely information about meetings, project updates, and opportunities for public participation, maximizing awareness through a blend of traditional and digital methods tailored to diverse communities.

To overcome challenges like limited internet access and language barriers, Metro uses multiple outreach tactics, including direct mail, email notifications, community partnerships, and strategically placed public notices. Each method aims to increase visibility and encourage engagement in decision-making.

Traditional mail remains vital for reaching areas with limited digital access. Metro sends printed notices to key neighborhoods, delivering meeting details, project updates, and feedback instructions directly to residents and business owners. Posters and flyers are also displayed in high-traffic locations such as libraries, community centers, transit hubs, and local businesses to extend outreach.

Email communication is another key component. Metro maintains a curated list of stakeholders who opt in for updates. Meeting notices and follow-up reminders are sent to community members, local leaders, and partner organizations. Additionally, Metro's website hosts a dedicated project page with regularly updated information, agendas, and documents.

Community partnerships amplify outreach by leveraging neighborhood organizations, business groups, and elected officials to distribute notices through their channels. This ensures the information reaches audiences less engaged with Metro's traditional methods. Metro also provides content for community calendars, newsletters, and social media managed by trusted local entities.

Social media and online advertising target specific audiences on platforms like Facebook, NextDoor, and Instagram. Metro shares multilingual updates and uses paid, geotargeted campaigns to reach communities directly affected by meeting topics.

For in-person outreach, Metro staff distribute notices at transit stations, farmers markets, and community events, offering direct engagement and encouraging participation. Door-to-door outreach in selected areas provides personal invitations and materials in residents' preferred languages.

By combining these strategies, Metro ensures all stakeholders receive accessible information across their preferred channels, enhancing transparency, fostering public participation, and demonstrating Metro's commitment to robust community engagement.

5.4 Limited English Proficient (LEP) Language Assistance Tools

A Metro advisory card is available for the public listing how to get language assistance services in seven languages other than English. An example of this advisory card is seen below:

Additional Languages & ADA Accommodations

ADA accommodations, such as ASL, large print and braille materials, will be provided upon request with 72 hours-notice by contacting Metro's ADA Department at 213-922-6919 or by email at accessibility@metro.net.

Additional languages will be provided upon request with at least three working days (72 hours) notice.



323.466.3876

x2 *Español (Spanish)*

x3 *中文 (Chinese)*

x4 *한국어 (Korean)*

x5 *Tiếng Việt (Vietnamese)*

x6 *日本語 (Japanese)*

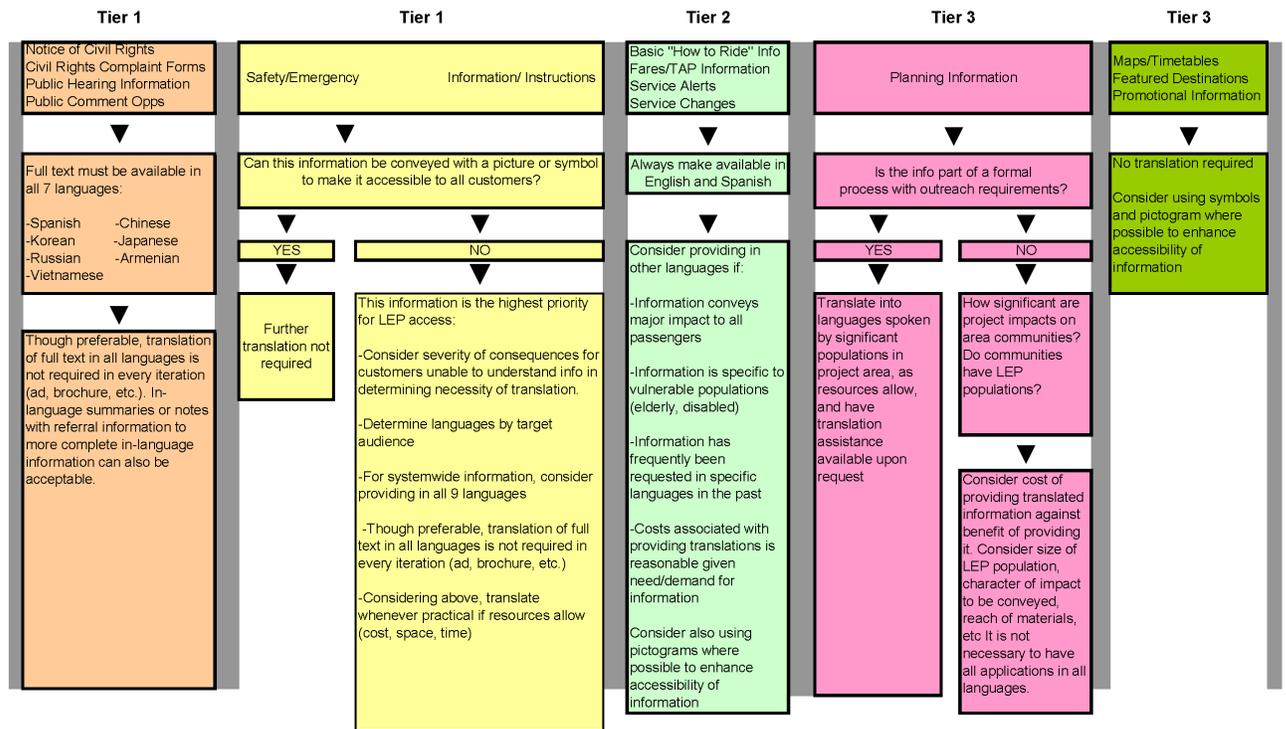
x7 *русский (Russian)*

x8 *Հայերեն (Armenian)*

Pocket transit guides are also offered in seven languages and distributed at meetings and through customer service sites. These can assist stakeholders with a long-term interest in the plan, project, or service change action to access community meetings and get additional information in language more easily.

To provide quality and meaningful LEP assistance to our customers, Metro staff utilizes the following Tier System as a guide to determine translation requirements.

LA Metro Language Assistance Plan - Reference Guidelines



6. Communications

6.1 Online Communications: Meetings, Updates & Ongoing Communications

Metro's online communications strategy ensures that public meeting notices, project updates, and ongoing engagement efforts are effectively delivered through digital channels. The transition to virtual meetings during the pandemic revealed key insights into participation trends, leading Metro to refine its approach. Data showed that attendance peaked during daytime hours while evening engagement declined, prompting adjustments to meeting schedules. Construction update meetings, traditionally held during lunch hours, shifted to afternoon virtual sessions to maximize attendance.

To optimize resources and engagement, Metro evaluates the necessity of each online meeting, the information being shared, expected stakeholder feedback, and the most effective methods to facilitate meaningful interaction. As remote work and daily travel patterns continue to evolve, Metro remains committed to adapting its digital engagement strategies to meet changing needs.

Metro's website serves as a primary hub for information, with resources like the **Metro Rider's Guide** available in multiple languages and enhanced with Google Translate to expand accessibility. **Project landing pages** provide comprehensive updates on specific initiatives, offering multilingual content, recorded meetings, interactive presentations, and the ability to submit comments or sign up for email notifications.

Metro's digital presence extends beyond its website through strategic use of online publications. **The Source** and its Spanish-language counterpart, **El Pasajero**, deliver project updates, meeting announcements, proposed plans, video presentations, and board actions. Readers can engage with content by commenting, sharing articles on social media, and staying informed about key developments.

Online advertising is a critical component of Metro's outreach, ensuring that meeting notices and project updates reach target audiences. Ads are deployed in English, Spanish, and other prevalent languages, using geotargeting and demographic-specific strategies to maximize visibility. Social media platforms, including Facebook, Instagram, and NextDoor, serve as key engagement tools where Metro provides real-time updates, directs users to additional resources, and promotes public meetings. In addition to posting content, Metro actively monitors social media to gauge public sentiment, address concerns, and respond to inquiries.

For those who prefer direct communication, Metro maintains **project information lines**, allowing community members to leave messages and receive responses from staff proficient in the necessary languages. This ensures accessibility for individuals who may not engage through digital channels but still seek timely information and assistance.

By integrating multiple digital communication tools, Metro enhances transparency, ensures broad access to meeting notices and updates, and fosters meaningful engagement with stakeholders in an increasingly digital landscape.



VIRTUAL		
<ul style="list-style-type: none"> • Newsletters • Eblasts • Blogs 	<ul style="list-style-type: none"> • Live Webcasts • Live Interviews • Digital Advertising 	<ul style="list-style-type: none"> • Social Media • YouTube Videos • Digital Surveys
IN PERSON		
<ul style="list-style-type: none"> • Stakeholder Briefings • Community Meetings • Public Hearings • Advisory Committees • Legislative Briefings 	<ul style="list-style-type: none"> • Business Outreach • Community Events • Community Councils • Door-to-Door Campaigns • Stakeholder Working Groups 	<ul style="list-style-type: none"> • Tours • Flyers • In-Person Surveys • Display Ads • Take Ones
TRADITIONAL / HYBRID		
<ul style="list-style-type: none"> • U.S. Mailers • Phone Hotlines • Media Relations 		



6.2 Broadcast & Print Media

Media advisories and press releases are distributed to a variety of local, national and ethnic print, and broadcast outlets. To expand the reach of Metro activities, Metro public relations staff look to distribute content to a diverse combination of digital, radio, print and broadcast outlets across the region.

For a complete list of media outlets, see Attachment E: Media Database.

6.3 Additional Approaches to Communications

Metro uses a diverse mix of communication strategies to ensure broad public engagement. Business webinars are a key outreach tool, offering stakeholders updates on projects, contract opportunities, and decision points. These webinars are promoted through project websites, targeted emails, social media, regional blogs, and community organization sites to maximize reach.

Virtual meetings and simultaneous broadcasts are essential for accessibility. Hosted on platforms like Lifesize, Zoom, GoToMeeting, Microsoft Teams, Facebook, and Metro’s website, these meetings allow stakeholders to participate remotely. Hybrid formats accommodate both in-person and virtual attendees, enhancing flexibility and inclusivity.

To further accessibility, Metro produces YouTube videos covering transit projects, services, safety initiatives, and public meetings. Available in multiple languages with subtitles or dubbing, these videos reach diverse communities and those unable to attend live sessions.

Targeted in-person engagement complements digital outreach. Door-to-door campaigns in residential and business areas provide direct, multilingual contact, with field teams distributing notices, gathering feedback, and answering questions to build community trust.

Metro's **Community Engagement Toolbox** combines traditional, digital, and direct outreach. U.S. mail reaches those with limited internet access; agency monitors at Metro stations display updates; blogs and newsletters offer ongoing insights. Business outreach programs, community event booths, and advisory committees facilitate direct interaction.

Digital engagement continues to grow via social media, web ads, targeted paid media, email, Nextdoor updates, and stakeholder briefings. Surveys and telephone town halls enable real-time public input, while legislative briefings and media relations keep policymakers and news outlets informed. Live webcasts and virtual meetings remain central to maintaining public dialogue.

Construction site tours and project alignment visits offer stakeholders firsthand experience, while technical advisory committees and working groups provide forums for collaboration. Hybrid meetings further enhance accessibility, allowing Metro's communications to evolve with community needs.

Through this comprehensive, adaptive approach, Metro is committed to informed public participation and transparency throughout all project phases.

6.4 Engagement Platforms

The launch of an internet-based Interactive GeoSocial Maps presents a model for enhanced public participation, allowing close examination of proposed transit projects by stakeholders living anywhere within LA County.

Users may examine details of routes, post comments on maps and images to be viewed by all interested parties and further shared on social media sites. This innovative tool can be accessed by mobile phone and offers the public a new level of engagement typically found through community meetings. In addition to its value as a public participation element, it also contributes as a project monitoring and tracking mechanism.

Metro will continue to engage effective digital communication tools to maximize public input and community engagement. These digital communications tools can include:

- Visual Simulations
- Augmented Reality
- [Virtual Community Engagement Platforms](#)
- [Interactive Maps](#)
- Telephone Town Halls

6.5. Public Engagement Metrics

Metro is continually assessing its outreach strategies to maximize civic engagement and extend our message to the public at large. To measure our efficacy in reaching the public, Metro tracks the number of total contacts with the community in a variety of different categories.

In 2024, Metro hosted 1,080 events with over 214,000 attendees. Clear and consistent communication remains a priority, with the agency sending 8.4 million emails at a 39% average open rate. To engage specific communities based on project impact, Metro used NextDoor, posting 162 times across 49 initiatives.

7. Conclusion

This Plan is, above all, a declaration of accountability to the public. It affirms Metro’s commitment to ensure that no person—on the basis of race, color, national origin, sex, age, disability, or any other protected class—is excluded from participation in, denied the benefits of, or otherwise discriminated against in any Metro program or activity.

The Plan documents the tools, strategies, and measurable practices that uphold Metro’s obligations as a recipient of federal funding. It reflects compliance with Title VI of the Civil Rights Act of 1964, guidance in the FTA Circulars on Environmental Justice, and FHWA’s public participation standards. In doing so, it also recognizes and centers the needs of Limited English Proficient individuals, low-income and minority communities, and people with disabilities.

As Metro continues to invest in and expand its transit network, this Plan serves as a framework for meaningful public engagement, guiding how the agency informs, involves, and responds to the people it serves. Its emphasis on innovation, transparency, and equity ensures that Metro’s outreach evolves alongside the communities of Los Angeles County.

Attachment A – Public Participation Case Study

To better illustrate how the elements of the Plan are implemented in public engagement, a recent example of a successful community outreach program is described below. This short case study showcases how Metro customized its engagement for a large transportation project to resolve community concerns and drive meaningful and informative public participation and input.

I. Project: Vermont Transit Corridor

OVERVIEW:

The Vermont Transit Corridor (VTC) is a 12.4-mile stretch with the highest north-south ridership on the system. It plays a key role in regional mobility and will be crucial for the 2028 Olympic and Paralympic Games, providing access to Olympic hubs like the Los Angeles Memorial Coliseum, USC, and Los Angeles City College. Metro is prioritizing community engagement to understand residents' needs, particularly in EFCs that require tailored outreach.

To align with the CBO Partnering Strategy, Metro has developed a community-based planning approach to engage a diverse range of stakeholders, especially seldom heard populations. This approach aims to define the project's mode - Bus Rapid Transit (BRT), light rail, or heavy rail - and guide improvements for this high-demand corridor.

BACKGROUND:

In April 2019, the Metro Board directed staff to advance both BRT and rail concepts into environmental review and study the feasibility of extending these options south, leading to the Vermont Transit Corridor South Bay Extension Feasibility Study, completed in December 2021. Before beginning the environmental review, Metro conducted a community-based planning effort aligned with its Equity Platform Framework to amplify voices along Vermont Avenue. This early engagement helped define priorities and ensured the final design would reflect the community's needs. From December 2021 to June 2022, Metro collaborated with community organizations, faith-based groups, and local neighborhood organizations to gather input on potential improvements for the VTC Project.

CUSTOMIZED APPROACH:

To maximize public engagement, Metro employed the following methods to customize outreach to the unique needs and characteristics of the communities most impacted by the Vermont Transit Corridor Project:

- Neighborhood-Specific Assessments
- Station Design Workshops
- CBO Partnership Program
- Elected Official and Stakeholder Briefings
- Transit Rider Survey and Canvassing

Neighborhood-Specific Assessments:

In February 2024, Metro hosted three workshops to refine Metro's cultural and historical landmarks list and identify ways to improve transit service and enhance community spaces. Metro also assessed transportation challenges and community priorities, considering income levels, vehicle access, spoken languages, and cultural preferences specific to the neighborhood.

Station Design Workshops:

In May and June 2024, Metro hosted workshops to ensure future BRT stations reflect community needs. These sessions focused on:

- **Station Location:** Input on optimal placement.
- **Accessibility:** Features like ramps, elevators, and tactile paving.
- **Amenities:** Seating, weather protection, real-time displays, and public art.
- **Neighborhood Integration:** Connections to walkways, bike paths, and gathering spaces.

CBO Partnership Program:

Metro's partnership with community organizations has notably increased participation from Black Indigenous People of Color (BIPOC) communities and marginalized groups, ensuring their feedback is incorporated into the project. The Community-Based Partners (CBPs), compensated for their efforts, have conducted outreach at faith-based centers, shelters, health service facilities, and schools.

Overall, Metro has received overwhelmingly positive feedback from community-based partners and stakeholders, showing strong engagement and support for the planned transit improvements.

Elected Official and Stakeholder Briefings:

Regular briefings have been held with elected officials' staff at the city, state, and federal levels to provide project updates, seek guidance, and gather input from those representing communities along the corridor. Key institutions and stakeholders are also briefed on the project schedule and invited to update meetings.

Transit Rider Survey:

Transit rider intercept surveys were crucial for gathering data on rider experiences and satisfaction with recent changes.

Methodology:

- **Onboard Surveys:** Distributing surveys on buses to assess travel times, service frequency, comfort, and amenities.
- **Intercept Surveys:** Conducting surveys at bus stops and stations to gather demographics, trip purposes, and satisfaction.
- **Online Surveys:** Reaching a broader audience to gather feedback on proposed improvements and design options.

Canvas Program:

Canvassers engaged small business owners, residents, transit riders, and street vendors, educating them about the project and inviting them to meetings.

Ongoing Communication Methods:

Metro continues to use multiple channels to keep the public informed, including newsletters, websites, social media, email updates, and interactive platforms like virtual reality and simulation videos. These methods provide various ways for stakeholders to access information and participate in the project.

RESULTS:

As a result of Metro's robust outreach strategy, the VTC project has engaged over 24,300 individuals through various activities as of February 2025.

- **Public Meetings & Workshops:** Eighteen public meetings, including three Cultural Needs Assessment workshops and seven Station Design Workshops, with over 1,621 participants and 900 feedback responses.
- **CBO Partnership Program:** Since launching the CBO Program in December 2022, Metro has worked with 38 local organizations to expand outreach and build trust, reaching marginalized stakeholders, including Spanish, Armenian, and Korean speakers, unsheltered individuals, and those with health and mental disabilities.
- **Elected Official and Stakeholder Briefings:** Metro briefed City Council Districts 1, 8, 9, 10, 13, and 15, as well as local institutions, business associations, and advocacy groups.
- **Transit Rider Survey:** Metro surveyed 371 riders at key stops along Vermont Avenue and on Bus Lines 204 and 754, collecting feedback in multiple languages during on- and off-peak times.
- **Canvassing:** Since December 2023, Metro canvassed 15 times along the corridor, engaging over 1,286 individuals in Armenian, English, Kiche, Korean, Spanish, Thai, and Zapotec.

At the March 27, 2025, Metro Board meeting, the Board approved the project as recommended by staff. In June 2025, the project received the "Advancing Diversity and Social Change" Award of Excellence by the American Planning Association of California – Los Angeles Chapter.

Attachment B - Resources

WEBSITE:

www.Metro.net

MAILING ADDRESS:

Los Angeles County Metropolitan Transportation Authority (Metro)
One Gateway Plaza, 99-13-1
Los Angeles, CA 90012-2952

METRO CONTACT AND DEPARTMENT INFORMATION

Transit Information: 323.GO. METRO (323.466.3876)
Metro Community Relations: communityrelations@metro.net
Metro Customer Care: customerrelations@metro.net
Metro Media Relations: mediarelations@metro.net

SOCIAL MEDIA

Facebook: facebook.com/losangelesmetro/
X (General Updates): @metrolosangeles
(Real time service changes): @MetroLAAalerts
Instagram: @metrolosangeles
YouTube: youtube.com/losangelesmetro

Additional Languages and ADA Accommodations

ADA accommodations, such as ASL, large print and braille materials, will be provided upon request with 72 hours notice by contacting Metro's ADA Department at 213-922-6919 or by email at accessibility@metro.net.

Additional languages can be requested at the number given below.



323.466.3876

x2 *Español (Spanish)*

x3 *中文 (Chinese)*

x4 *한국어 (Korean)*

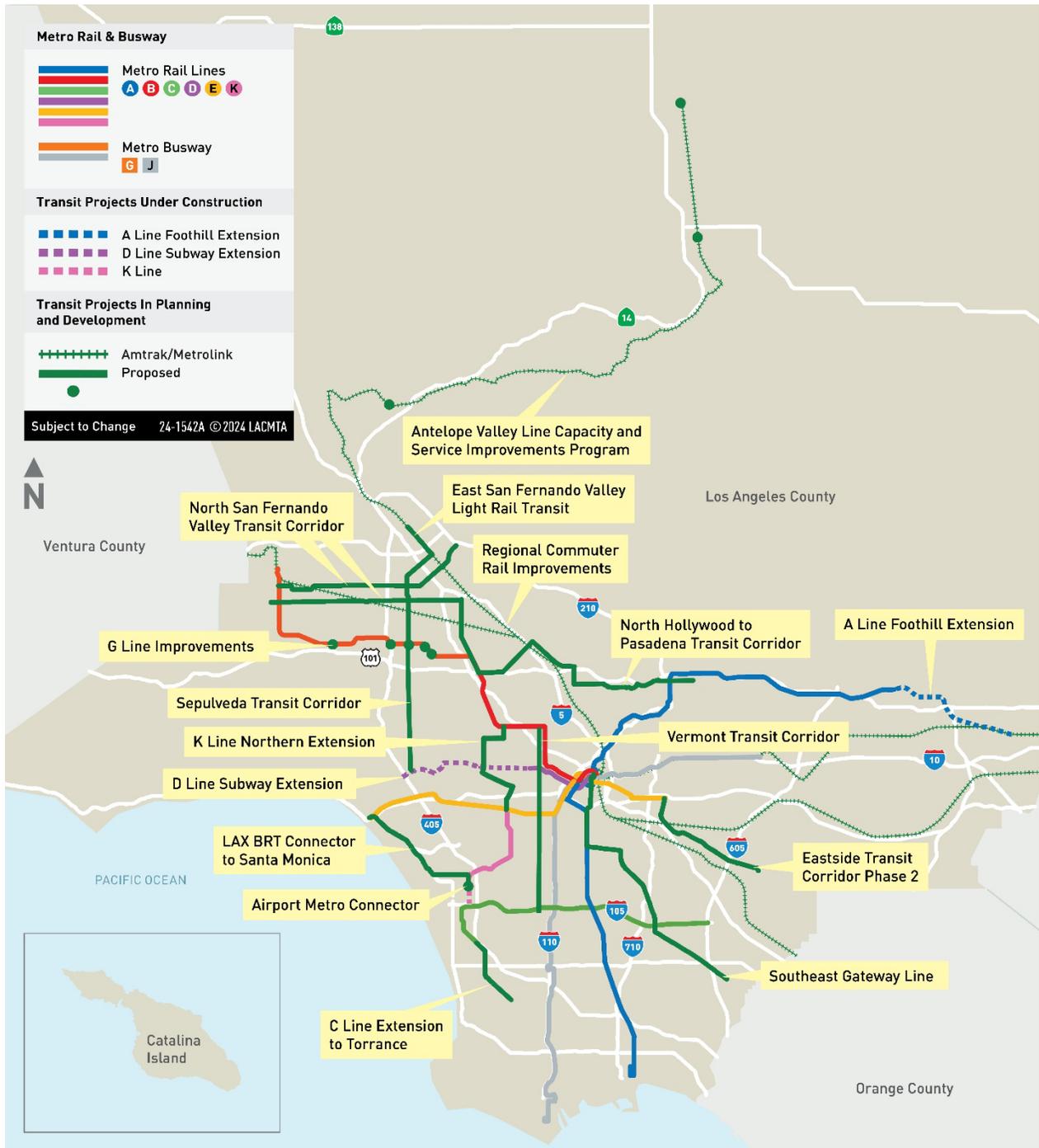
x5 *Tiếng Việt (Vietnamese)*

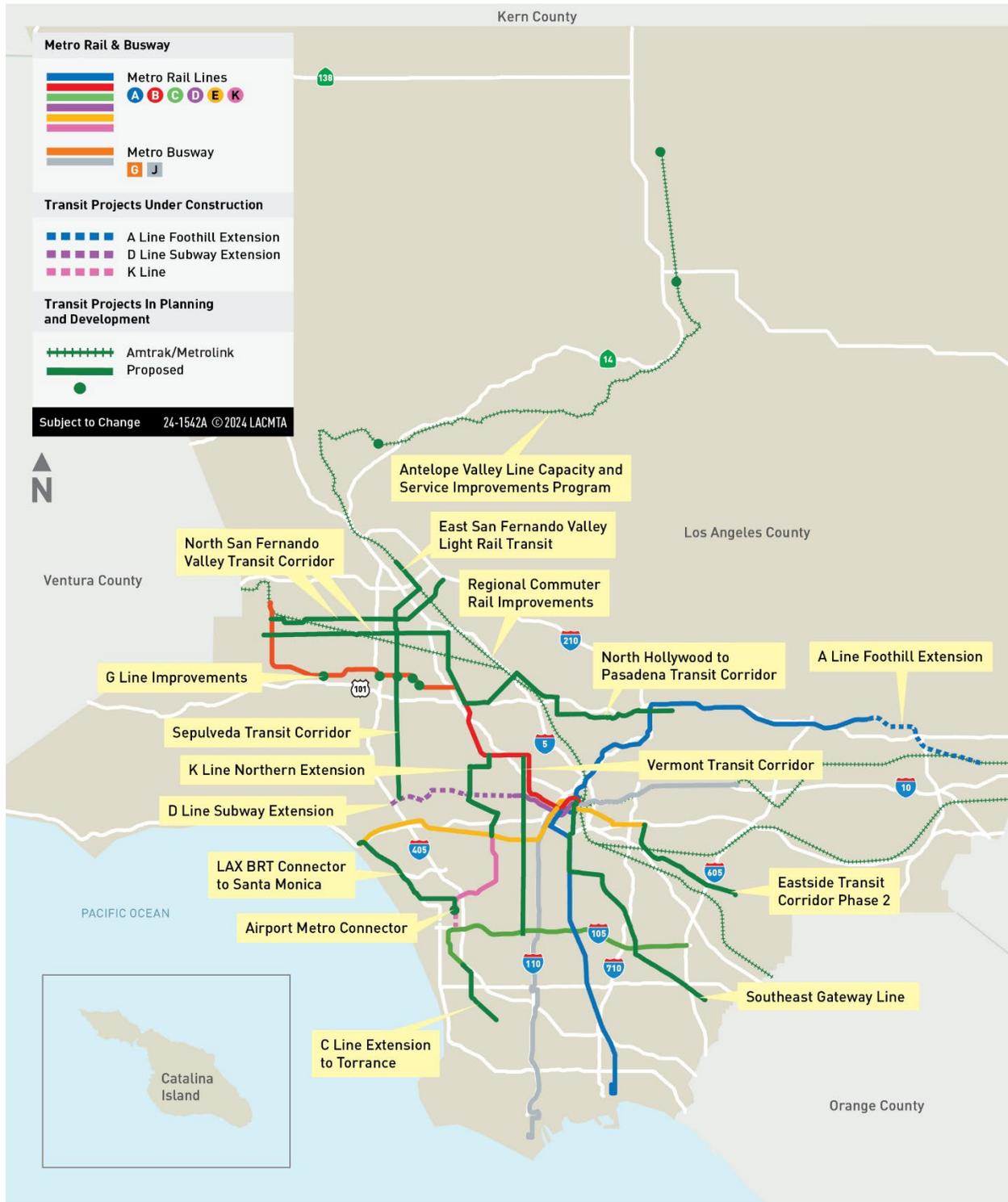
x6 *日本語 (Japanese)*

x7 *русский (Russian)*

x8 *Հայերէն (Armenian)*

Attachment C– Planned Transit Projects & Planned Highway Projects Map





Attachment D

Stakeholder Database

LA County Stakeholders are an important part of Metro’s network. They include everyone from our riders to businesses, housing advocates, education institutions, environmental groups, and faith- and community-based organizations. The information includes a general overview of the types of stakeholders Metro works with on projects, programs and initiatives.

Community-Based and Advocacy Organizations

- Civil Rights and Racial Justice Organizations
- Disability Rights and Independent Living Centers
- Immigrant and Refugee Advocacy Groups
- LGBTQ+ Organizations
- Tenant and Housing Justice Organizations
- Faith-Based and Interfaith Groups
- Homelessness Services Providers
- Food Insecurity and Hunger Relief Organizations
- Veterans Support Organizations
- Senior Advocacy Groups and Aging Networks

Civic, Neighborhood, and Resident Groups

- Neighborhood Councils and Homeowner Associations
- Community Leadership Councils
- Parent-Teacher Associations (PTAs)
- Cultural Heritage and Ethnic Community Groups
- Local Volunteer and Mutual Aid Networks

Business, Labor, and Economic Stakeholders

- Chambers of Commerce
- Business Improvement Districts (BIDs)
- Small Business Alliances and Entrepreneur Networks
- Labor Unions and Workforce Development Boards
- Minority-Owned Business Associations

Education and Youth Engagement

- K–12 School Districts and Charter Networks
- Colleges, Universities, and Trade Schools
- Student Advocacy and Youth Leadership Organizations
- Early Childhood Education Providers
- Literacy and Adult Learning Centers

Health and Human Services

- Community Health Clinics and Federally Qualified Health Centers (FQHCs)
- Public Health Departments
- Mental Health and Behavioral Services Providers
- Disability Services Agencies

Regional Centers (serving people with developmental disabilities)

Transportation and Environmental Partners

Environmental Justice and Climate Resilience Groups
Active Transportation and Complete Streets Coalitions
Transit Rider and Mobility Advocacy Organizations
Transportation Network Companies (e.g., Uber, Lyft) and Taxi Associations
Trucking, Freight, and Logistics Stakeholders

Government and Planning Agencies

City and County Planning Departments
Councils of Governments (COGs)
Regional Transportation Planning Agencies
Elected Officials and Constituent Offices
U.S. Department of Housing and Urban Development (HUD) Partners

Public Safety and Emergency Services

Police, Fire, and Emergency Management Agencies
Violence Prevention and Community Safety Groups

Arts, Culture, and Communication

Local Arts Councils and Cultural Institutions
Libraries and Literacy Programs

Ethnic Media and Community Radio Outlets
Social Media Influencers with Local Reach
Public Access Television and Local News Networks

Special Interest and Technical Partners

Legal Aid and Public Interest Law Organizations
Technology Equity and Digital Access Nonprofits
Research Institutions and Think Tanks

Attachment E – Media Database

Metro works with the following media outlets to disseminate information about its projects and initiatives.

General Market / Major Dailies / Wire Services

Associated Press
Bloomberg News
City News Service
Daily Journal
Los Angeles Times
New York Times
Notimex
Reuters
UPI

Regional and Local Community Newspapers

San Fernando Valley

Daily News
Encino Patch
Glendale News-Press (LA Times)
San Fernando Valley Business Journal
Santa Clarita Valley Signal
SVF Sun / El Sol
The Toluca Times
Van Nuys News Press

San Gabriel Valley

Beacon Media Group: Pasadena Independent, Arcadia Weekly, Monrovia Weekly, San Gabriel Sun, Sierra Madre Weekly, Temple City Tribune, Azusa Beacon, Duarte Dispatch, El Monte Reader, Rosemead Reader
Pasadena Weekly
San Gabriel Valley News Press
San Gabriel Valley Tribune

Westside Central / Downtown LA

The Argonaut
Beverly Hills Courier
Beverly Hills Patch
Beverly Hills Weekly
Culver City News
Culver City Observer
Downtown Weekly LA
Los Angeles Independent
LA Downtown News
Malibu Times

Park La Brea News / Beverly Press
Santa Monica Daily Press
Santa Monica Mirror
Santa Monica Observer

Gateway Cities

Downey Patriot
El Pasajero (Metro publication)
Grunion Gazette (Press-Telegram)
Hews Media Group: Los Cerritos Community News, La Mirada Lamplighter
Long Beach Press-Telegram
Signal Tribune (Signal Hill)
Los Angeles Sentinel
We Like LA

South Bay

Beach Reporter (Daily Breeze)
Easy Reader News
Gardena Valley News
Palos Verdes Peninsula News (Daily Breeze)
Torrance Daily Breeze

Multilingual, Ethnic, and LEP-Focused Publications

Spanish-Language

La Opinión
Hoy
Día a Día News
Voz Libre
Vida Nueva
CNN Español
El Pasajero (Metro publication)

Asian American, Pacific Islander, and Indigenous

Rafu Shimpo (Japanese)
Korea Times / Radio Korea
Radio Seoul
Radio Manila
Pacific Islander Times (NHPI)
Indian Country Today (Native American)

African and Caribbean Diaspora

African Times USA
AfroLA
African Focus (KPFK radio show)

LGBTQIA+ Media

The Pride LA
Los Angeles Blade
Q Voice News

Disability-Focused Media

Ability Magazine
New Mobility
Partnerships with Disability Rights California, local access orgs

Youth and Campus Media

Daily Bruin (UCLA)
USC Daily Trojan
El Camino College Union
Santa Monica College Corsair
Youth-run blogs or zines (e.g., *Teen Vogue* digital outreach, social-first newsletters)

Faith-Based & Cultural Community Media

Church, mosque, and temple bulletins (e.g., AME, Coptic, Vietnamese Catholic, etc.)
L.A. Catholic Archdiocese publications
Local synagogue newsletters
Islamic Center of Southern California updates

Broadcast Media

Major Television Stations / Cable

KCBS/KCAL 2/9
KTLA 5
KABC 7
KTTV 11
KMEX 34 (Univision)
KVEA 52 (Telemundo)
KAZA 54
KSCI LA 18 (Multilingual)
KBS 24

Radio Outlets

English Language

KABC Radio
KCSN
KFI
KFWB
KCRW
KPFK
KROQ
KNX
LAist
National Public Radio (NPR)
Voice of America
Metro Networks

Multilingual / Community-Focused

KWKW (Spanish)
Radio Exitos
Univision Radio
Radio Korea
Radio Manila
Radio Seoul

Digital Media & Blogs

The Source (Metro publication)
El Pasajero (Metro publication)
LAist
Discover Los Angeles
Planetizen
Streetsblog LA
We Like LA
Nextdoor (via Metro partnership)
Reddit: r/LosAngeles (event sharing, AMAs)
CivicSignal newsletter
Urbanize LA

Trade, Labor & Industry Publications

Engineering News Record
Builders & Developers
Metro Magazine
Mass Transit
Passenger Transport
Labor Notes
SEIU Local 721, ATU Local 1277, and other union newsletters



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EXECUTIVE SUMMARY

Los Angeles County Metropolitan Transportation Authority (Metro) serves as transportation planner, coordinator, designer, builder and operator for Los Angeles County. More than 9.2 million people live, work, and play within its 1,447-square-mile service area.¹

Metro's Transit Service Policy (TSP) establishes criteria and guidelines to ensure that the transit system is developed and managed consistent with policy guidance approved by the Metro Board of Directors, including a formal process for evaluating services, service design guidelines, and a process for approving and implementing service changes.

In 2018, the Board adopted Metro Vision 2028 as the agency's strategic plan. The Plan outlines five goals to guide the development of transportation in LA County to help Metro ensure that our customers feel safe when riding, that they do so in clean equipment, service is reliable and on-time, and our staff provides service in a courteous manner.

- Goal 1:** Provide high-quality mobility options that enable people to spend less time traveling
- Goal 2:** Deliver outstanding trip experiences for all users of the transportation system
- Goal 3:** Enhance communities and lives through mobility and access to opportunity
- Goal 4:** Transform LA County through regional collaboration and national leadership
- Goal 5:** Provide responsive, accountable, and trustworthy governance within the Metro organization

Also in 2018, Metro began the NextGen Bus Study to review and update the Metro bus system to ensure it provides a competitive transit service to meet the travel needs of LA County residents and visitors. The NextGen Bus Study included a comprehensive look at both Metro bus service performance and the overall travel market in LA County to determine where Metro bus service could be more useful. The study included significant input from riders and stakeholders to help develop a framework of guiding principles for positioning Metro's bus services to be more competitive in the overall travel market and to serve Equity Focus Communities most effectively, where the need for high quality transit is greatest.

In early 2020, the Metro Board approved the release of a draft NextGen Bus Plan for public review. Significant public input gathered in the first half of 2020 was incorporated into a revised draft NextGen Bus Plan released in July 2020 ahead of public hearings (August 2020), Service Council approvals (September 2020), and Board adoption of this plan in October 2020. Phased implementation of the Reconnect Phase of NextGen Bus Plan with a set of frequency tiers and a simplified route structure focused on fast, frequent, and reliable service began in December 2020, with additional phases in June and September/December-2021. Implementations of key NextGen Bus Plan bus speed and reliability elements, including new

¹ Represents all people living in the Census Tracts within Metro's service area per the 2023 American Community Survey Data. Service area is calculated from taking 0.75 mile buffer around all Metro bus line and rail stations.

2025 Metro Transit Service Policies & Standards

bus priority lanes and other bus speed and reliability tools such as transit signal priority and bus stop optimization began at the same time and continue to be implemented as of 2025. This phase of NextGen is known as Transit First. The NextGen elements are all reflected in this update of the Transit Service Policy, and the NextGen Bus Plan remains the guiding principle for the Metro bus network.

SECTION 1: INTRODUCTION, PURPOSE & BACKGROUND

Metro first adopted a Transit Service Policy (TSP) in 1986. It is a required component of Metro's Title VI Plan and is reviewed on at least a triannual basis as part of the Title VI Plan Update. It is updated as needed to better reflect agency goals and objectives, major service initiatives and policy changes, and changes in local, state, and federal regulations and funding. This document updates the most recent version adopted by the Board as part of the NextGen Bus Plan adoption in November 2022². This document sets forth the policies, principles, and service guidelines that are used by Metro staff in the design or modification of the bus network to better serve customers and make more beneficial use of available operating resources. The TSP outlines the service change process that provides the quantitative tools to evaluate the system, identifies the process required to seek public input and approvals for major service changes, and ensures the regional transit system is adjusted according to the service goals and objectives approved by the Metro Board.

Metro operates a comprehensive bus and rail network that complements Metrolink regional rail and municipal operator services across LA County. Determining the most appropriate transit service on a corridor depends on several factors such as demand, resource availability, site and corridor characteristics, environmental considerations, and community acceptance. The characteristics that determine which type of service is most appropriate are summarized in Table 1.1.

1.1 Metro Bus

As of December 2024, Metro operates 117 bus routes. Metro's bus operations consist of directly operated and contract operated services: 107 routes are directly operated by Metro, and 10 routes are operated by contractors. Metro serves around 12,000 bus stops, including station stops on the G and J Line BRT systems. On weekdays, Metro operates a fleet of over 1,650 buses during peak service hours. Metro operates the largest portion of all bus services provided in the region. Municipal and Local Return operators provide additional public bus and paratransit services in areas of the region where Metro provides limited or no service. Metro relies on Access Services for provision of ADA paratransit service in the Metro service area.

As developed in the NextGen Bus Study, Metro classifies its bus services into tiers stratified by the frequency of service. The tiers are assigned to individual routes in accordance with demand and propensity for future growth. These frequency tiers are especially important to ensure high frequency service is provided on key corridors serving Equity Focus Communities³ where the need for high-quality transit is greatest.

² <https://boardagendas.metro.net/board-report/2022-0262/>

³ In 2019, under the Equity Platform, the Board adopted a community designation of Equity Focus Communities (EFCs) to identify where transportation needs are greatest. As of 2022, [EFCs](#) are defined as areas with higher concentrations of resident and household demographics associated with mobility barriers (low-income households earning less than \$60,000 per year; Black, Indigenous, or People of Color (BIPOC) populations; and households that do not have a car).

Table 1.1 *Service Type Determination⁴*

Service Type	Corridor	Optimal Characteristics
Heavy Rail (Subway)	Operate 100% within an exclusive right of way.	<ul style="list-style-type: none"> – 2,500 boardings per route mile or more than 50,000 boardings per day. – Ability to construct a fully grade-separated facility.
Light Rail	Operate in mixed flow traffic, semi-exclusive or a fully- exclusive right of way.	<ul style="list-style-type: none"> – 1,000 boardings per route mile or more than 25,000 boardings per day. – Ability to construct a guideway within or adjacent to the corridor.
Commuter Routes (Tier 5)	Operate in mixed-flow traffic in a High Occupancy Vehicle (HOV) or High Occupancy Toll (HOT) Lane. <ul style="list-style-type: none"> – Segments may operate on local streets. – Operated using 40', 45', or 60' buses. 	<ul style="list-style-type: none"> – 300 or more boardings during peak hours and in peak direction of travel.
Metro Liner and Metro Rapid	Operate using 40', 45' or 60' buses. <ul style="list-style-type: none"> – Metro G Line BRT and J Line (Metro Liner) operate entirely or partially on a fixed guideway dedicated to transit buses. – Metro Rapid Lines operate in exclusive peak period or all day bus lanes or mixed flow traffic on local streets with signal priority. 	<ul style="list-style-type: none"> – 300 or more boardings during peak hours and in peak direction of travel. – More than 500 average daily boardings per route mile or more than 10,000 daily boardings. – Ability to implement operating speed improvements in the corridor.
Core (Tier 1), Convenience (Tier 2), Connectivity (Tier 3), and Community (Tier 4) Local Routes	Operate in mixed flow traffic on local streets by 32', 40', 45', or 60' buses. <ul style="list-style-type: none"> – Core lines to be supported by exclusive peak period or all day bus lanes and signal priority on existing and former Metro Rapid corridors. – Lines are defined by frequency of service offered, with Core lines being the most frequent and Community lines having a minimum frequency of at least hourly, with all tiers intended to run all days of the week. 	<ul style="list-style-type: none"> – The median bus route carries about 5,000 average weekday boardings (CY2024). – Core and Convenience services are expected to carry more than the daily median, while Connectivity and Community are anticipated to carry less.

Table 1.2 describes the features of each of Metro’s bus service types. Tier definitions are based on daytime weekday (i.e. peak and midday) frequencies:

- **Core (Tier 1):** 10 minutes or better
- **Convenience (Tier 2):** 12 to 15 minutes
- **Connectivity (Tier 3):** 20 to 30 minutes
- **Community (Tier 4):** 40 to 60 minutes
- **Commuter (Tier 5):** Varies by Line

⁴Capacity limits adapted from TCRP, Research Results Digest, November 1999—Number 35, Highlight of Large Transit Capacity and Quality of Service Manual, Figure 1 Achievable Capacity (Peak direction passengers/hour)

Table 1.2 *Metro Bus Service Types and Features*

Feature	Bus Service Type			
	BRT and Liner	Rapid	Commuter (Tier 5)	Core (Tier 1), Convenience (Tier 2), Connectivity (Tier 3), Community (Tier 4) Local Bus Services
Right of Way	Segregated right-of-way	Major arterials; peak hour or all-day bus lanes	Major arterials and freeways.	Major arterials and local streets; peak hour or all-day bus lanes for Core Tier 1 lines, with bus bulbs as alternative to bus lanes for Tier 1 and 2 lines
Target Average Stop Spacing	1.25 miles	0.75 mile	1.25 miles	0.25 mile
Target Travel Market	Inter-community, regional	Inter-community	Inter-community, regional	Inter-community, neighborhood
Vehicle Type	40/45/60-foot buses	40/45/60-foot buses	40/45/60-foot buses	32/40/45/60-foot buses
Communities Served	Multiple	Multiple	Multiple	Multiple
Signal Priority	Yes	Yes	No	Yes for Core and Convenience (Tiers 1 and 2)
Fare Collection	On board J Line Off-board pre-pay G Line	On board	On board	On board, with all-door boarding being implemented for all bus lines (2025)
Passenger Amenities	Shelters and stations	Shelters and stations	Shelters and stations	Benches and shelters (provided by local jurisdictions), though not at all stops
Real-time Passenger Info	Yes	Yes	Yes	At some stops and via smart phone applications

1.2 Metro Rail

Metro Rail operates in heavily congested, high-demand travel corridors and provides connections to key multi-modal transportation hubs. Metro operates two types of rail service to better match the transit mode with specific customer demand and needs. As of summer 2025, Metro operates two heavy rail and four light rail lines serving a total of 111 stations across approximately 121.3 route miles, with a fleet of 108 heavy rail (including the first eight new HR4000 cars) and 337 light rail cars.

Metro heavy rail is high-capacity, two line rapid transit service operating along a dedicated subway right-of-way, serving full-scale transit stations in some of the most densely populated areas of LA County. Metro’s heavy rail subway system served by the B and D Lines powered by a third rail and generally operated with 4- or 6-car train sets.

Metro’s existing light rail system consists of four lines with segments of mixed flow, street running, or grade separated right of way, with full-scale transit stations. The rail system is a critical public transportation asset in the greater Los Angeles region, linking many key multi-modal transportation centers and destinations together. Metro’s four light rail lines – A, C, E,

and K Lines are powered by overhead catenary wires, generally use shorter 2- or 3-car train sets and operate at slower speeds than heavy rail.

The first segment of the new 8.5 mile, 8-station Crenshaw/LAX K Line opened in October 2022; a ninth new station, the Airport Metro Connector (AMC) Station, opened on June 6, 2025. In June 2023, the opening of the 1.9 mile Regional Connector light rail alignment through downtown LA facilitated the realignment of the former L Line rail line into the A Line and E Line services, creating direct links from Long Beach to Azusa (A Line) and Santa Monica to East LA (E Line). This alignment includes two new stations and one replacement station in downtown LA.

1.3 Metro Micro

Some areas of the County are difficult to serve with fixed-route transit due to terrain, narrow streets, dispersed lower density destinations and population, and relatively low travel activity. To address these challenges, Metro launched pilot microtransit operations in December 2020, branded as Metro Micro.

Metro Micro is operated with passenger vans within eight designated zones and is intended to test a range of use cases including areas where fixed route service has not been effective or is unable to access parts of a community. A number of lower ridership fixed-route services have been discontinued within the new Metro Micro zones as part of the NextGen Bus Plan implementation, to determine if Metro Micro can be an effective and efficient replacement for Metro fixed route bus service in these hard-to serve areas.

Section 5 is dedicated for discussing the unique nature of this service.

SECTION 2: DESIGNING A WORLD CLASS BUS SYSTEM

In 2018, the Board adopted Metro Vision 2028 as the agency's strategic plan. The Plan outlines five goals to guide the development of transportation in LA County. The NextGen Bus Study was also initiated in 2018 to reimagine the Metro bus network to be more relevant, reflective of, and attractive to the diverse customer needs within Los Angeles County. The NextGen Bus Plan and Study were completed to address strategic plan **Goal #1: Provide high quality mobility options that enable people to spend less time traveling**. The study also encompassed two sub-goals: 1) Target infrastructure and service investments towards those with the greatest mobility needs; and 2) Invest in a world class bus system that is reliable, convenient, safe, and attractive to more users for more trips.

In addition to the Vision 2028 Strategic Plan, the Board adopted Motion 38.1 (June 2018), endorsing travel speed, service frequency, and system reliability as the highest priority service design objectives for the NextGen Bus Study. Finally, regardless of the level of resources expended on the bus network, optimizing system performance should always be an objective in network design to maximize benefit to the public from available resources. These goals and objectives drove the development of the NextGen Bus Plan, including guiding principles for routing, stop spacing, frequency, span of service, and coordination with municipal operators. A set of performance measures are defined below to ensure the bus network continues to evolve consistent with the intent of NextGen to create a competitive bus service for LA County.

NextGen Bus Plan

Metro Vision 2028 envisions building a World Class Transportation System in which a World Class Bus System is a cornerstone to its success. Building a World Class Bus System requires improving the attractiveness and competitiveness of the bus network. Attractiveness includes addressing issues such as safety and security, cleanliness, comfort, real-time arrival information, easy fare payment, wayfinding and signage, and first/last mile access. Competitiveness requires developing a bus network that minimizes the overall travel time to complete a trip compared to the driving alternative. This travel time considers directness of route, access to and from the bus stop, waiting time, and onboard travel time.

As mentioned in the Executive Summary, NextGen's primary purpose was to improve the competitiveness of the bus network. However, through this process, improvements to certain aspects of attractiveness can also be achieved. The following outlines the strategy of the NextGen Bus Plan's design as the foundation for building a fast, frequent, and reliable World Class Bus System.

Step 1: Reconnect Scenario: Metro currently provides roughly 7 million revenue service hours (RSH) of bus service per year. The first step in creating a World Class Bus System is to redesign the routes and schedules to attract trips where and when there is the greatest market potential. The lessons learned in Phase 1 of the bus study presented a path forward for reinventing the bus network through restructuring the bus lines consistent with service usage and travel patterns using the following guiding principles identified in the NextGen Bus Study:

- **85% of LA County residents have used transit at least once in the past year**, THEREFORE, the NextGen Bus Plan attempts to maintain coverage throughout the County by minimizing discontinued segments.
- **Fast/frequent/reliable service is key**; THEREFORE, the NextGen Bus Plan is designed to create a competitive transit network that reduces overall travel time by optimizing all components of the trip, including walking, waiting, and riding.
- **Metro’s pre-NextGen bus system was not always competitive to get people where they want to go**, THEREFORE NextGen Bus Plan has adjusted routing to reflect the key origins and destinations identified in cell phone location data for overall travel patterns and ridership data for transit ridership patterns.
- **The greatest opportunity to grow ridership is between midday & evening when many trips are short distance**, THEREFORE service levels under the NextGen Bus Plan have been improved for off-peak periods, especially midday, weekday, and weekends, with more improvements planned, especially for evenings. New overnight Owl services have been added or are planned.
- **Need to integrate Metro’s Equity Framework into the planning process**, THEREFORE the NextGen Bus Plan service improvements prioritize equity-focus areas where the need for high-quality transit service is greatest.

These lessons were incorporated into the Plan’s Service Design Guidelines outlined in Section 3 to “reconnect” routes and schedules with where and when people travel today. This NextGen Bus Plan Reconnect scenario was implemented across the December 2020, June 2021, and September/December 2021 service change cycles. Reconnect was estimated to increase ridership by 5% with no additional increase in revenue service hours. It will also help Metro recover from the impacts of the COVID-19 pandemic on ridership.

Step 2: Transit First Scenario: Building upon the Reconnect scenario of NextGen Bus Plan that provides a bus network that better reflects the travel patterns of today, the next step in building a World Class Bus System is to: 1) invest in speed and reliability infrastructure, 2) create safe and comfortable waiting environments, 3) improve the boarding and riding experience, and 4) establish facilities to optimize layovers. These capital improvements create a more competitive and attractive bus network while saving resources to be reinvested into more frequent service.

- **Speed and Reliability Improvements** – Declining bus system speeds reduce the opportunity to increase service, degrade the competitiveness and attractiveness of bus service, and are not sustainable. Therefore, investing to improve the speed and reliability of the bus system is critical to the success of NextGen. Some improvements within Metro’s control that can be implemented include optimizing stop spacing and implementing all-door boarding. However, other improvements can only be implemented through collaboration with local jurisdictions, such as transit signal priority system upgrades and expansion, new bus bulb-outs, and bus-only or bus priority lanes. Under the NextGen Transit First scenario, a major 5-year program of capital improvements was approved to support speed and reliability improvements for the

regional bus network. This investment is anticipated to save 25-34% in system speed if fully implemented, thus allowing for more frequent service to be delivered without adding additional operating costs. New bus lanes were rolled out in 2020 and 2021 on 5th and 6th Sts, Grand Av, Olive St, and Aliso St in downtown LA, and on Alvarado St between 7th St and Sunset Bl. Additional lanes have been implemented on La Brea Av between Sunset Bl and Olympic Bl (2023), and Roscoe Bl between the SR-170 freeway and Topanga Canyon Bl (2024) as part of the North San Fernando Valley Corridor Improvements Project. These are just the beginning of a program to add over 100 miles of dedicated bus lanes through partnerships with City of LA and other municipalities.

- **Customer Wait Environment** – Significant public outreach conducted in Phase 1 of the NextGen Bus Study, as well as other Metro initiatives such as the Understanding How Women Travel Study⁵, highlighted that an uncomfortable and unsecured wait environment is a significant barrier to using the bus network for current and potential customers. This is particularly concerning for women who account for over half of our customers and often travel with young children. Metro completed a Metro Transfers Design Guide in March 2018⁶ to elevate the importance of the transit rider experience and builds upon Metro’s First/Last Mile Strategic Plan by addressing the “complete journey” for riders. Under the Transit First scenario; the NextGen Bus Plan is intended to begin implementing the recommendations from this policy document at our busiest wait and transfer locations. This investment is anticipated to cost \$150 million and address several of the safety and comfort issues identified through the NextGen outreach and the How Women Travel Study. Implementation will be completed in partnership with local authorities responsible for the provision of bus stop amenities throughout the Metro transit network.
- **Boarding and Riding Experience** – Metro has implemented all-door boarding on the G Line, J Line, and Rapid Lines 720 (Wilshire) and 754 (Vermont). Experience on the J Line showed that dwell times were reduced by up to 15% on average, on-time performance improved, and cash payment declined with more TAP penetration. Surveys confirmed that both customers and operators were significantly satisfied with the implementation of all-door boarding. In early 2022, the Metro Board approved the purchase of rear door validators and other equipment to allow for implementation of all-door boarding across the higher frequency Core and Convenience (Tiers 1 and 2) local bus lines. Other strategies to improve the boarding and riding experience have focused on improved real-time information accuracy. As of early 2025, the installation of rear door validators on all Metro buses was complete. Software testing continues in advance of expanding all-door boarding systemwide.
- **Layover Optimization** – Due to limited curb space, many routes are extended purely to access a suitable layover location. These route extensions are not required for riders and cost several million dollars in operating costs per year. By investing in off-street layover

⁵ libraryarchives.metro.net/DB_Attachments/2019-0294/UnderstandingHowWomenTravel_FullReport_FINAL.pdf

⁶ [Metro Transfers Design Guide](#)

terminals to optimize layover locations, Metro can reallocate wasted operating resources to more productive uses. In addition, these locations can provide facilities for better regional mobility coordination, better wait and rest environments for customers and operators, improved bus service reliability, and opportunities for new en-route Zero Emission Bus (ZEB) charging infrastructure.

This estimated \$1 billion capital program for the NextGen Speed and Reliability and Passenger Amenity improvements mentioned above, planned for implementation over a five-year period, is expected to achieve resource savings by generating more revenue service miles/trips with the same number of revenue service hours. These savings would be reinvested into Transit First service improvements, including:

- Ensuring that all bus lines operate seven days per week;
- Increased weekday midday and evening service levels;
- Increased weekend service levels and;
- Expanded owl (overnight) service.

Investing “one time” capital dollars into transit supportive infrastructure will increase the attractiveness and competitiveness of the bus network, while freeing resources to reinvest into service enhancements. Under the Transit First scenario, these benefits are expected to generate a 15-20% increase in ridership (10-15% over and above what Reconnect Scenario was expected to achieve) without additional increases in revenue service hours.

Step 3: Future Funding Scenario: Should future funding be secured through efforts such as congestion pricing, additional resources can be added to the NextGen Transit First network. However, without disincentives for driving, there will be diminishing returns on benefits since most customers would already have been served within the Transit First Scenario. Therefore, a 34% increase in revenue service hours to provide even more frequent service, as planned under a Future Funding Scenario, would only be expected to yield a 10% increase in ridership over Transit First.

SECTION 3: BUS SERVICE DESIGN GUIDELINES

Key Principles of Network Design

Three key elements were taken into consideration during the NextGen Bus Study and NextGen Bus Plan to identify when and where transit can be competitive and successful.

- **Transit Propensity** – Areas where the propensity to use transit is the greatest embody three main characteristics: first, there is a significantly large population of transit market segments, including people who rely on transit (especially those identified in Metro’s Equity Focus Communities) for most of their travel such as commuters, students who use transit for work and school trips, and discretionary customers who choose transit for some or all their trips. The second characteristic is the intensity of travel demand to and from areas based on population and employment densities, retail and entertainment, colleges and universities, and other trip generators. Third, a pedestrian-oriented street environment that includes safe and well lighted pathways, sidewalks and curb-cuts, grid street network, and level topography is critical.
- **Existing Service Performance** – It is important to identify the most productive segments of the existing bus network which articulate current transit demand. These corridors and routes have been optimized through the NextGen Bus Plan, and lessons learned will be applied to other areas with similar demand and service characteristics.
- **Service Environment** – A transit-oriented service environment is also critical to the success of transit, not just to facilitate fast, frequent, and reliable transit operations, but also to support to the ability of transit to thrive as a viable option. The importance of environmental elements such as pedestrian orientation of the streets, land use, barriers to other modes such as limited and costly parking supply, and transit supportive infrastructure such as bus-only lanes and other transit prioritization design are critical. The NextGen Bus Speed and Reliability program is working to address this key element.

Once these key elements are taken into consideration in the NextGen Bus Plan’s focus on fast, frequent, and reliable service, this transit orientation can then be translated into design considerations, including elements explained in the following sub-sections.

3.1 Service Design Concepts

Service design concepts were developed as part of the NextGen Bus Study and incorporated into the NextGen Bus Plan based on the feedback received through the study’s stakeholder and public outreach sessions and established as guidelines. Network characteristics most important to the public include:

- Faster service
- Frequent service throughout the day
- More reliable service
- Better network connectivity
- Accessibility to key destinations

- Improved security

Table 3.1 illustrates how each service concept will address the various themes expressed by the public and stakeholders.

Table 3.1 *Service Design Concepts*

	Faster service	Frequent service throughout the day	More reliable service	Better network connectivity	Access to key destinations	Improved security
Optimize stop spacing	X		X			
Shorter route lengths			X			
Subarea transit hubs				X		X
Municipal operator coordination				X	X	
Standardize frequency by service tier	X	X				
Routing to reflect current travel patterns and transit propensity				X	X	X
Transit-supportive infrastructure	X		X			X

Based on these themes, the following service design concepts were incorporated into the NextGen Bus Plan implemented to deliver an improved Metro bus network:

Optimize Stop Spacing – Past practice was that stop spacing was determined by route classification. Local lines were planned with 0.25 mile stop spacing, while Rapid lines had 0.75 to 1 mile stop spacing. As a result, customers travelling on Local lines travelled more slowly but had closer access to origins and destinations. Conversely, Rapid customers travelled faster along a corridor but may have been picked up or dropped off much further from their origin or destination. Thus, resources were split between the Local and Rapid lines, resulting in less frequency for each service, and overall end-to-end travel time including walking/rolling to/from stops, waiting for the bus, and in-vehicle run time may result in longer overall travel times on the Rapid, especially for shorter distance trips.

Consolidating Local and Rapid resources along 18 major transit corridors was implemented in 2020/2021 as part of the initial roll out of the NextGen Bus Plan. The single hybrid service retained on these key corridors provides more frequent service at all stops and, when matched with optimized 0.25 mile average (and 0.3 mile maximum) stop spacing adopted as part of NextGen Bus Plan and new bus lanes, results in shorter wait times, faster on-board travel times compared to the previous Local service, and shorter walk/roll compared to Rapid service. In addition, this standardizes the service frequency along the entire corridor as compared to providing inconsistent frequencies between Local and Rapid services that have different speeds. Stop spacing can be adjusted to reflect local conditions with the needs of key destinations such as schools, medical centers, and senior centers taken into account while balancing the impact each stop has not just for those that use the stop, but for those on

board that are delayed by buses stopping. Stop spacing may exceed stop standards due to extenuating circumstances such as incompatible land uses and non-compliant stop locations.

Shorter Route Lengths and Subarea Transit Hubs – Location-based cell phone data indicates that almost half of all trips made in Los Angeles County are within 1 to 5 miles. In addition, the origin-destination travel patterns indicate that many people travel locally and not necessarily across the region. Creating shorter, core route lengths with maximized service frequency and bus speed improvements such as new bus lanes will improve schedule reliability. Being able to tie the lines to subarea transit hubs will improve network efficiencies and provide safer and more convenient locations for transfers.

Municipal Operator Coordination – Metro serves as LA County’s regional coordinator of transit services. Improved coordination between all operators and modes is vital to establishing an integrated regional transit network. Metro operates within a hierarchy of services, in which Metrolink provides the region’s commuter rail to serve high volume, longer distance trips. Metro Rail, Metro Liner (G and J Lines), and Metro Bus serve as the backbone of the urban transit network within much of LA County and are augmented by municipal operators. Municipal and local return operators complement the system with community and shuttle buses that serve specific neighborhood needs.

It is imperative that Metro bus service be closely coordinated with municipal transit service as roughly one-third of transit service in LA County is provided by municipal bus operators and Metrolink, and resources are scarce. Duplication of service should be avoided to maximize the benefit of transit service across the County. Municipal operator coverage is especially strong in Santa Monica, Culver City, South Bay, Gateway Cities, and eastern San Gabriel Valley as well as Santa Clarita and the Antelope Valleys. When municipal operators undergo their own system redesigns, there are opportunities to work together to develop service change ideas between Metro and municipal services to improve overall coordination for customers. The NextGen Bus Plan included four transfers of Metro bus service to municipal operators in cases where the line was more appropriate as part of the municipal operator’s network; two were transitioned in 2021, and the remaining two were transferred in 2024.

Standardized Frequencies by Service Tiers and Headway Standards – Prior to the implementation of the NextGen Bus Plan, schedules were written based on the Board-adopted load standard for frequent services (15 minutes or better) and on policy service levels for low frequency services (less than 15 minutes). To ensure the core network has consistent frequencies and span of service, the NextGen Bus Plan categorized transit lines into tiers based on transit propensity, current ridership, the nature of the service, and overall travel demand. Each tier has been assigned a frequency range for each time period to ensure that all services within the tier provide consistent service levels for ease of transfer across the network, with minimal adjustment from year to year.

The headway standard provides 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; it should not be exceeded for at least 90% of all hourly periods. These frequencies are the minimum service

levels versus the target frequencies established under NextGen Bus Plan shown. The minimum acceptable frequency levels for bus and rail are defined in Table 3.2. The minimum levels are below normally operated existing levels but may be applied in special circumstances such as an urgent maintenance need or system expansion rail tie-in, and transitional periods such as 6-7 p.m. when bus frequencies are adjusted to those for the next time period, or for a significant decline in ridership for bus (e.g. COVID) that is not expected to be permanent. Use of minimum frequencies must still allow load standards to be met. A line may see frequency improved at a selected time of day in response to high demand, consistent with the Board-adopted load standard being met on all trips operating on the line.

Table 3.2 *Minimum Service Frequency by Service Type*

Service Type	Peak	Midday Weekday	Weekend	Evening
Heavy Rail	10	12	12	20
Light Rail	10	15	15	20
Core Network (Tier 1)	10	10	15	7.5
Convenience Network (Tier 2)	15	15	30	10
Connectivity Network (Tier 3)	30	30	60	15
Community Network (Tier 4)	60	60	60	30
Commuter Network (Express)	varies	varies	varies	varies

Table 3.3 *Minimum Rail and Bus Frequency by Service Type for Title VI Analysis*

Service Type	Weekday Peak (6-9a and 3-6p)	Midday Weekday (9a-3p)	Weekends (10a-5p)
Heavy Rail	15	15	15
Light Rail	15	15	15
Core Network (Tier 1) Metro Liner and Metro Rapid	10-15	15	15
Convenience Network (Tier 2)	15-20	20-30	20-30
Connectivity Network (Tier 3)	30-40	40-60	40-60
Community Network (Tier 4)	60	60	60
Commuter Network (Tier 5)	varies	varies	varies

Metro Micro and Other On-Demand Services – Some areas of the County are difficult to serve with fixed-route transit due to terrain, narrow streets, dispersed lower density destinations, and relatively low travel activity. To address this, Metro launched an on-demand, van-based rideshare service branded as Metro Micro. The service is designed to provide short trips within a zone where each rider would have to wait no more than 15 minutes from the time a reservation is made to when they are picked up at a designated pickup location. All pickup and drop-off locations are located within the zone and must be ADA accessible but are not limited to bus stops. The pilot program operated for three years and continues in operation today while Metro continues to improve the financial sustainability of this service model. A number of lower ridership fixed-route services were discontinued within the Metro Micro

zones as part of the NextGen Bus Plan implementation, and Metro Micro was used as a replacement for Metro fixed route bus service in these hard-to serve areas. More information about this new mode is available in Section 5.

Routing to Reflect Current Travel Patterns and Transit Propensity – Under the NextGen Bus Study, corridors were evaluated by segments based on the origin-destination travel patterns identified using the cell phone location-based data and regional TAP data. The segments were connected together to create lines that better align the routing with travel patterns. This is expected to reduce the number of transfers required to make a trip, and to increase the distance travelable and access to opportunities along the network within a given time frame. While resources are focused in areas with high transit propensity, there is a concerted effort to maintain service in areas of low demand but with the greatest mobility needs.

Transit Supportive Infrastructure – Service design will identify transit supportive infrastructure that either improves overall travel time and reliability or reduces inefficiencies in the network. Speed and reliability improvements include separated lanes, queue jumpers, bus bulb-outs, traffic signal retiming, transit signal priority, all door-boarding, fare payment technology, and the Advanced Transportation Management System (ATMS) use that improve the attractiveness and competitiveness of transit while reducing revenue hours so that they can be reapplied to provide more frequent service. Infrastructure that optimizes terminals and layover locations, reduces out of direction movements, and improves transfer movements will reduce non-revenue miles and hours that can also be reallocated to more frequent service. Infrastructure supporting the NextGen Bus Speed and Reliability focus includes:

- **Separated Bus Lanes:** There are three types of segregated bus lanes that Metro Liner service can use:
 - Fully segregated transit bus right-of-way: segregated bus lanes reserved exclusively for transit service on a full-time basis such as the right-of-way built for the G Line or the I-10 transitway used by the J Line and other transit services. These lanes may be spaced apart from streets and freeways or physically separated with physical barriers or painted lines.
 - Exclusive bus lanes operating on existing arterial roads and local streets on a part-time basis (e.g. peak period weekday, daytime weekday, etc.). These lanes are also being implemented to support the NextGen Core (Tier 1) Local bus lines and Metro Rapid lines.
 - HOV travel lanes reserved for transit, high occupancy vehicles, and sometimes, vehicles paying a toll. Separation is achieved with physical barriers or painted lines. J Line and Metro Commuter (Tier 5) services use this third type of lane on parts of the I-10 and I-110 freeways.

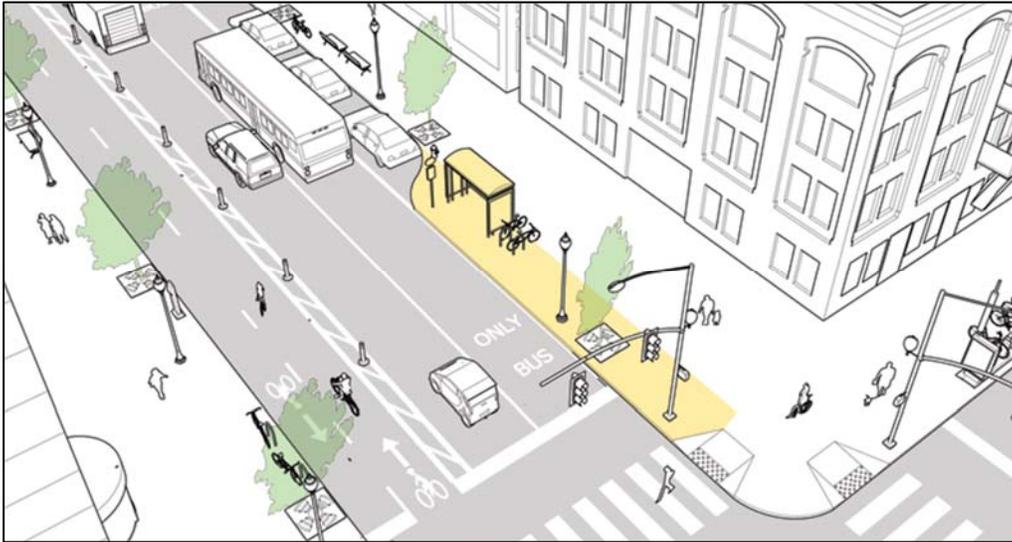


Figure 3.1 *Bus bulb*

- **Bus Bulb Outs:** On NextGen Core (Tier 1) and Convenience (Tier 2) corridors where dedicated bus lanes are unable to be accommodated due to the need to maintain traffic and parking capacity, or where the **frequency** of service (less than 10 minute headway) does not warrant dedicated lanes, bus bulb-outs can support transit service by minimizing stop delay. Bulb-outs are extensions of the bus zone, typically across the first parking lane, that enable buses to serve the bus stop from the second traffic lane. This reduces delays for buses merging in and out of traffic and creates additional space for transit stop amenities. Figure 3.1 provides an illustration.⁷
- **Transit-Signal Priority:** This key strategy facilitates the movements of in-service transit vehicles through signalized intersections to improve transit performance by extending the green phase or shortening the red phase (advancing the green phase) of traffic signals when a transit bus is detected at an intersection. This technology already exists on former and existing Metro Rapid corridors in City of LA, selected other cities, and LA County unincorporated areas, or is being added to NextGen Core (Tier 1) and Convenience (Tier 2) routes. Metro is working with LADOT to adapt LADOT’s existing Transit Signal Priority system to better serve Metro’s NextGen service model using cloud-based technology. The work underway will adapt LADOT’s system to provide signal priority to all Metro buses. Certain constraints of the old system such as only serving buses that arrived late and requiring individual buses to be associated with a single corridor will also be removed. This project will provide improved signal priority operation for all Metro buses operating on equipped corridors. Work on this project is ongoing with launch of the cloud-based solution to be rolled out in 2026.

⁷ Illustration from National Association of City Transportation Officials Urban Design Guide: nacto.org/publication/urban-street-design-guide/street-design-elements/curb-extensions/bus-bulbs/

- **Queue jumpers:** A queue jump is where there is a separate signal phase for transit vehicles so they can get ahead of other traffic. They may operate from a regular traffic lane or be partnered with a queue bypass lane.
- **Headway-Based Service Management:** Operating the most frequent and highest usage bus lines on a system based on managing headways (or intervals) between trips rather than on time points to regulate service offers the chance to keep service moving while minimizing wait times and travel times for riders. This approach was piloted on 3rd St Line 16 between June 2023 and December 2024 as part of the NextGen Bus Speed and Reliability initiatives, using a mix of staff-and technology-based line management techniques. Results are being evaluated and appear mixed, with limited improved reliability in terms of intervals and challenges rolling out the labor required to manage multiple lines. No further pilots are planned at this time.
- **All-door boarding:** The J Line has TAP validators at both the front and back doors to facilitate all-door boarding to speed up boarding and reduce rider travel times. Metro Rapid Lines 720 (Wilshire) and 754 (Vermont) operate on two of Metro’s busiest corridors and also piloted this option. All-door boarding is planned to be extended to all Metro bus lines by mid-2025 to help reduce travel times for most riders. All buses have the required rear door validators, but software testing continues.
- **Fare Payment Technology:** For convenience and faster service, major stations have ticket vending machines (TVMs) which allow customers to preload their TAP cards. All G Line Bus Rapid Transit fare collection is completed at the stations and the fleet does not have on-board fare boxes. Additional features such as the ability to access low income, student, and senior discounts, receiving two hours of free transfers, paying for transfers between TAP agencies, and participating in fare capping have also been incorporated into Metro’s TAP system for ease of use.
- **Advanced Transportation Management Systems (ATMS):** provides an array of technologies to improve service reliability and customer experience. ATMS relies on global positioning system (GPS) satellite navigation and terrestrial communication technologies to enable better tracking, management, and dispatching of vehicles. Components combine mobile voice and data communications, computer assisted dispatch (CAD), automatic voice annunciation (AVA), and automated vehicle location (AVL) to provide users with tools to manage Metro’s bus fleet. This data also provides a source of real-time information that is integrated into real time service information feeds to help riders navigate the system successfully. Automatic Passenger Counting (APC) and a Video Surveillance System (VSS) are also used to gather ridership data and enhance passenger and employee safety.

3.2 Load Standards

Board-adopted service standards are established to ensure that service levels are maintained to meet a minimum standard of rider experience. Passenger load standards have been developed to ensure there is sufficient capacity on Metro Bus and Rail service. The loading standard for bus is based on the maximum average ratio of customers to available seating per vehicle size (i.e. 40-foot, 45-foot, and 60-foot buses). The loading standard for rail is based on

the maximum average ratio of customers per seat by service type (i.e. Heavy Rail and Light Rail). Current loading standards are shown in Table 3.4.

Table 3.4 *Passenger Loading Standards by Vehicle Type*

Vehicle	Seats per Vehicle	Passengers per Sq. Foot (Rail)/Seat (Bus)	Maximum Passengers Onboard
Heavy Rail – A650	50	3.45	143
Heavy Rail – HR4000	47	3.45	131
Light Rail – P3010	68	4.25	133
Light Rail – P2550	71	4.25	138
Light Rail – P2000	70	4.25	139
Bus – 40 foot	38	1.30	49
Bus – 45 foot	46	1.30	60
Bus – 60 foot	57	1.30	74

- **Bus Passenger Loading Standard** expresses the maximum average ratio of customers to vehicle size and frequency by direction for a one-hour period that should not be exceeded for at least 95% of all hourly periods. This TSP maintains the current loading standard for Metro bus to 1.3 as recommended by the 2016 APTA Peer Review Committee.
- **Rail Passenger Loading Standard** expresses the maximum average ratio of customers to vehicle type and by direction for a one-hour period which should not exceed for at least 95% of all hourly periods.
 - The load standard for Metro heavy rail is number of seats plus 3.45 square feet per passenger by vehicle type and is consistent with Metro’s peers like New York MTA, Chicago Transit Authority, BART and Boston MBTA.
 - The load standard for Metro light rail is number of seats plus 4.25 square feet per passenger by vehicle type and is consistent with Metro’s peers like Denver RTD.

Switching to a square footage per passenger better reflects the balance between available seating and standing room. The former metric of a multiplier by seating capacity does not respond to the changes in Metro Rail fleet seating count and standing area space. The total amount of square footage available for standees is based on the net interior square footage of the passenger cabin.

Metro Liner Transit

Metro Liner transit provides regional, high-speed line haul service in high-volume corridors. These lines are designed to operate like rail service, complete with separated right-of-way, wide stop spacing, bus stations, pre-paid and/or all door boarding, real time customer information, and transit signal priority. Currently, Metro operates two Metro Liner services:

- **G Line** operates on its own semi-exclusive right-of-way and meets the Federal Transit Administration (FTA) definition of Bus Rapid Transit (BRT)

- **J Line** operates on the I-10 and I-110 ExpressLanes (freeway toll lanes) as well as surface streets through downtown Los Angeles, so it does not fully meet the FTA definition of BRT.

Wheelchair Boardings and Pass ups.

Ideally, in a floating 6-month period, regular operating bus service will average no more than a 5% pass-up rate of customers who use wheelchairs or other mobility devices. Should the average increase to over the 5% threshold, Service Planning will adjust service to better serve the ridership patterns of the route so as to minimize pass-ups.

3.3 On-Time Performance

A key element of high-quality transit service, as confirmed in the NextGen Bus Study, is reliability. This element is measured firstly in terms of on time performance. Managing this metric is intended to provide a high standard of service reliability. On-time performance for buses is defined as a range from no more than 1 minute early to no more than 5 minutes late, which is measured at all timepoints along a route. For rail lines, on-time performance is measured based on end terminal arrival. This standard varies between heavy rail and light rail.

Metro internally has an internal interim goal of 78.5%. As the agency works to improve on-time performance, this goal will be progressively moved towards achieving the aspirational goal of 85%. The on-time performance standard is summarized in Table 3.5.

Table 3.5 *Target Standard for On-Time Performance*

Service Type	On-Time Performance
Heavy Rail	95%
Light Rail	90%
All Metro Bus Services: Liner, Rapid, Core (Tier 1), Convenience (Tier 2), Connectivity (Tier 3), Community Bus (Tier 4) Commuter (Tier 5)	85%

Service Cancellations:

In recent years, both pre-pandemic and during times of significant impacts from the COVID-19 pandemic on the Metro operator workforce, cancelled service due to lack of available operators has had a significant impact on service reliability. Metro should not enter into service level changes unless sufficient operators are available to provide the required extra board operator as required (OAR) ratio of 1.23 for bus and 1.25 for rail at each operating division. Cancelled service should ideally be zero each day in support of the best customer experience. As of March 2022, a target of 2% or less cancelled service has been set as part of service restoration preconditions and continues to be the goal. Current service cancellations as of mid-2025 are below 1.0% for weekdays and Saturdays and below 2.0% for Sundays.

3.4 Transit Stop Spacing:

Bus stops and station stop locations should balance safe, convenient access with pedestrian safety as well as other community curb space needs. Locations should support efficient

transit operations, convenient rider transfers, minimize walking distances and unnecessary crosswalk movements, and be located at a signalized or signed crosswalk to disincentive or minimize crossing against traffic lights at unprotected/uncontrolled locations (i.e., no crosswalk or signal light, etc.). Bus stops are generally located adjacent to a bus/rail station or within a short walk to medical facilities, schools, shopping centers, office buildings, multi-unit apartments, or other activity centers to provide access for uses that generally attract transit customers. Access to medical centers, senior centers, and schools have high priority when considering new bus stop locations and/or when relocating existing bus stops.

Stop/Station Spacing

The average Stop/Station spacing refers to the average distance between consecutive stops/stations along an entire bus/rail route. The standard is expressed as the maximum average stop/station spacing in miles by type of service and is not to be exceeded by at least 90% of all routes operated. Metro’s average stop/station spacing by mode is summarized in Table 3.6.

Table 3.6 *Target Average Stop/Station Spacing*

Service Type	Average Stop/Station Spacing (miles)
Heavy Rail	1.50
Light Rail	1.50
Metro Liner	1.25
Rapid	0.75
Commuter (Tier 5)	1.25
Core (Tier 1), Convenience (Tier 2), Connectivity (Tier 3), Community (Tier 4)	0.25

Stop/station spacing is established based on the goals and guidelines each service type is designed to achieve as described in the following discussion:

Heavy/Light Rail Line station spacing is greater than bus stop/station spacing to achieve a higher operating speed, recognizing that riders are willing to access such service from a greater distance and to ensure this mode is competitive for longer distance travel, while ensuring stations serve key activity nodes and transit connection points. Rail station location is determined during the design phase. Ideal average rail station spacing should be no greater than 1.50 miles.

- **Metro Liner, Commuter Bus (Tier 5) and Rapid Bus Routes** achieve the highest bus speeds through even greater stop spacing than Local Core (Tier 1), Convenience (Tier 2), Connectivity (Tier 3), and Community (Tier 4) lines. To ensure these services provide access to major activity centers and transfer points, average stop/station spacing should be no greater than 1.5 miles, though there may be exceptions due to geography or existing facility design such as freeway HOT or HOV lanes. Target average spacings are 1.25 miles for Metro Liner and Commuter Bus service tiers, and 0.75 for Rapid Bus.
- **Core, Convenience, Connectivity, and Community Bus Routes** primarily operate on city streets and secondary streets respectively. These route types are designed to provide

service closer to a customer's destination and reduce walking times. Therefore, average stop spacing should be no greater than 0.25 miles for convenient walk access while maximum stop spacing should be 0.3 miles between any two consecutive stops except in areas where no stops are required or physically possible (freeways, bridges, undeveloped areas).

Decisions regarding bus stop spacing and location call for analysis of ridership density, customer service requirements such as balancing access to key destinations and impact to on-board riders, rider and operational safety, equipment size, service type, interaction of stopped buses with general traffic flow, and coordination with other curbside space allocations such as parking and driveways. Stops should be spaced closer in major commercial districts and farther in outlying areas. In general, bus stop spacing should not exceed 0.3 miles for local bus service except in areas where local physical conditions such as bridges, freeways, and/or areas that lack of ridership generators such as undeveloped areas may result in a wider gap between stops. Care should be taken to avoid low usage stops in areas where the buses are closest to the maximum load on board the bus. Special consideration may be given to stops near schools, senior centers, and medical centers where there is reasonable ridership (≥ 15 boardings or alightings on average per weekday).

3.5 Bus/Rail Interface and Route Planning

BRT/Rail station locations are determined during the design phase of a fixed guideway/right-of-way. There are criteria associated with station location, including connectivity and centrality to catchments and major arterials, but also technical feasibility which is beyond the scope of this TSP. Generally, stations are located at major transfer points with bus or rail and provide access to major activity centers and arterials. No standard type of stop can be recommended for all locations, as each intersection has its own unique characteristics. An inventory of land uses that serve as major trip producers and attractors within a 0.25-mile corridor of the road under consideration should be taken prior to establishment. The location of a transit stop requires concurrence of the municipality in which the stop is located .

As the Metro Rail system expands, the surrounding bus system within 0.5 mile of each station is assessed for adjustments that would improve access to rail stations, take advantage of new transfer facilities, and reduce bus and rail service duplication. The following guidelines provide direction for routing and scheduling changes that will be necessary as the Metro Rail system is expanded:

Discontinuation of Parallel Limited and Express Service

Competing Community and Commuter (Tiers 4 and 5) bus services that parallel the rail corridor will be discontinued where duplication exists. Revenue services should be reinvested to improve service on lines that feed the new rail service where possible.

Bus Route Deviation

Bus routes that run parallel to a rail line may be diverted to a station when:

- Walk time from the nearest station is greater than 3 minutes;

- Diversion time in one direction is 5 minutes or less, and;
- Net travel time benefit for connecting customers is positive i.e. the transfer to rail does not result in overall increased travel time.

Intersecting bus lines or ones that travel in a perpendicular direction to a rail line will be diverted to serve the closest rail station when:

- Diversion time in one direction is 5 minutes or less
- Net travel time benefit for connections and through travel

Extend Terminating Lines

Bus routes that end within up to one mile of a rail station may be considered for extension to terminate at that station. Routes that terminate at distances greater than one mile may be extended if the rerouting will create a valuable link to the rail system consistent with area travel patterns or will result in a reduction in travel time for a significant number of customers.

New Bus Routes

New rail feeder service will be considered as part of the service change process if a need is demonstrated based on significant area travel patterns and if funding is available.

Scheduling Rail/Bus Interface

Bus arrival and departure times should be governed by the rail arrival and departure times when predominant movement is from bus to rail. Bus routes with frequencies of 20-60 minutes ending at a rail station should be scheduled to arrive 5 minutes before the rail departure time (plus walk time between the modes). When the predominant movement is from rail to bus, terminal buses should be scheduled to depart 5 minutes after the scheduled rail arrival time (plus walk time between the modes).

3.6 Metro Bus Routing and Facility Guidelines

Network Route Spacing

Network route spacing refers to the average distance between two or more parallel bus and/or rail lines. It is generally accepted that customers are willing to walk up to 0.25 mile to a bus stop. Generally, bus routes operating parallel to each other in an urban area should be spaced 0.5 miles from one another, and bus routes operating parallel to rail should be spaced 0.5 miles from either side of a rail route. Bus routes operating parallel in a suburban area should be spaced no more than one mile apart from each other, and bus routes operating in low density or underdeveloped areas should be operated where needed in a cost-effective manner. Where possible, alternative delivery methods should be considered.

An easy-to-understand-and-use transit system relies on simple network and route design. Consolidating duplicative services on the same or parallel corridors within 0.25-mile to 0.50-mile distance provides an opportunity to simplify the network for ease of use, reduce underutilized capacity, and invest those resources into other areas of the network. This

concept requires coordination of schedules and transfer points and will result in an easier-to-use and more convenient system that reduces rider wait time and overall travel time.

Facility Design

Metro's directly-operated service primarily operates three types of buses: a standard 40-foot bus, a 45-foot bus, and a 60-foot "articulated" bus. To ensure that buses can adequately navigate route alignments and serve bus stops, Metro established the following standards:

– **Bus Layover Zones and Terminals**

- Layover zones should be designed to accommodate various sizes of buses based on expected fleet deployments (including the outlook for future ridership increases and fleet options).
- Layover zones should utilize sawtooth bay configurations where possible to ensure curb space is more efficiently and reliably utilized and can accommodate 60' buses where needed.
- Re-striping of layover zones should be completed as needed based on the needs of the service and bus sizes scheduled.
- Routes should be scheduled so that the amount of layover space needed is available. Layover zones should be placed as close as possible to the route terminal. Where not accommodated by the design, the added operating cost to serve the location will be computed and made part of the decision-making process for bus/rail interface.

– **Minimum turning radius clearance required for each type size bus movement**

- 50 feet for 40-foot buses (Figure 3.2)
- 47.5 feet for 45-foot buses (Figure 3.3)
- 44 feet for 60-foot articulated buses (Figure 3.4)

– **Optimal Bus Stop Curb Lengths and Zone - 40-foot buses should at minimum be:**

- Far-side – 90 feet
- Near-side – 100 feet
- Mid-block – 150 feet

For two 40-foot buses servicing a stop simultaneously, add 50 feet. Additional bus stop curb length may be needed for 45-foot buses.

– **60-foot bus should a minimum e:**

- Far-side and mid-block – 120 feet
- Near-side – 170 feet

For two 60-foot buses servicing a stop simultaneously, add 70 feet.

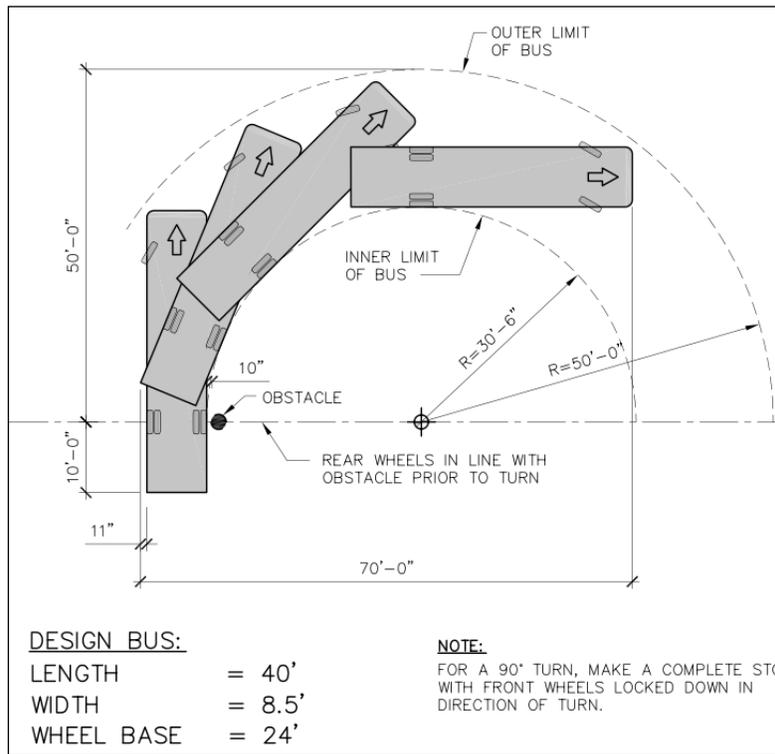


Figure 3.2 40-foot bus turning radius

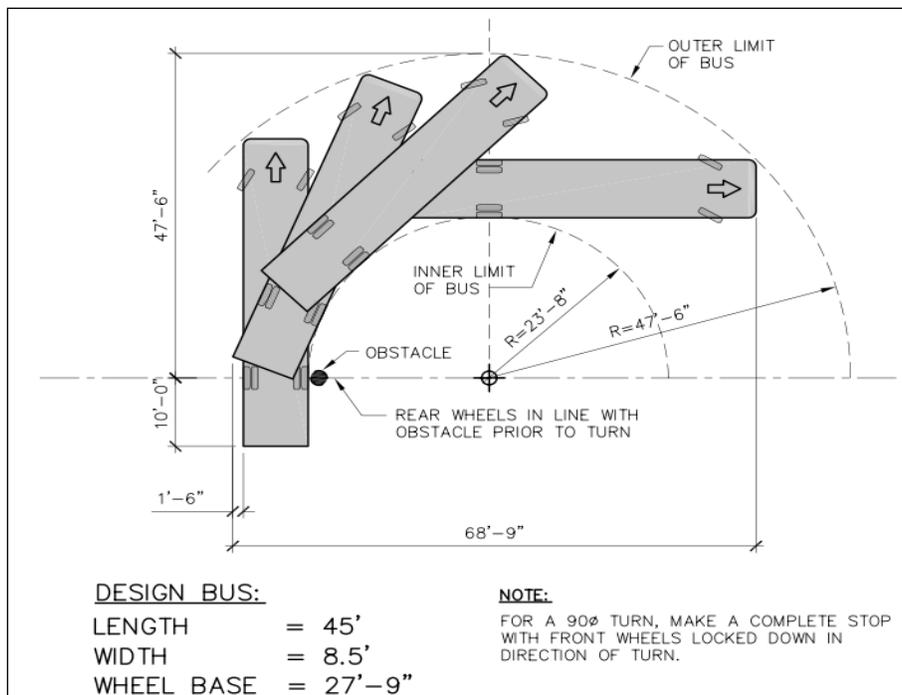


Figure 3.3 45-foot bus turning radius

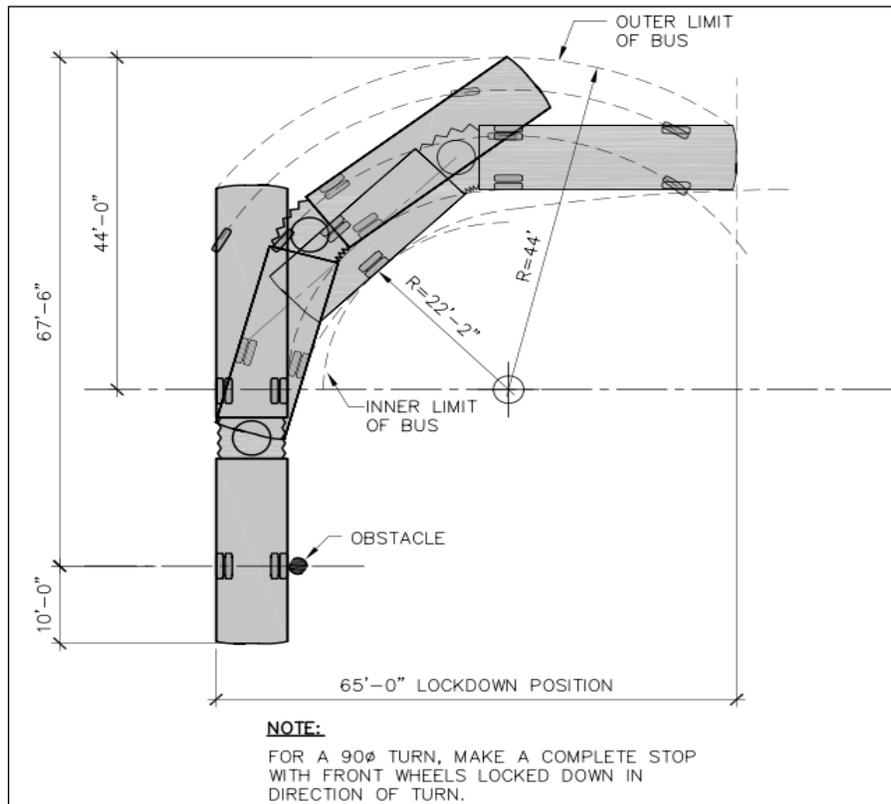


Figure 3.4 Articulated 60-foot bus turning radius

- **Bus Layover Zone** general space requirements based on frequency between scheduled trips:
 - One space – 20 minute service or less frequent
 - Two spaces – 12 to 15 minute frequency
 - Three spaces – 7.5 to 10 minute frequency
 - Four spaces – 5 to 6 minute frequency
 - **Desired street lane widths** for bus operations should be 12 feet or more.

Route length may impact these above requirements with longer routes needing longer layover time between trips.

Bus Stop/Station Accessibility

All stops and stations should be fully accessible in accordance with the 1990 Americans with Disabilities Act. This includes ensuring there are no obstructions preventing the boarding and alighting of customers who use wheelchairs or other assistive mobility devices, and that pathways to and from stops and stations are unobstructed. If obstructions do exist, every effort must be made to mitigate the issue(s) with the respective municipalities. In the case of bus stops, they can be moved to a new location on a permanent basis or temporary basis

depending on situations, such as during construction. There are some stops that were grandfathered in under ADA legislation to maintain service, pending future improvements.

Table 3.7 *Comparative Analysis of Bus Stop Locations*

Stop Type	Advantages	Disadvantages
Near-Side	<ul style="list-style-type: none"> – Minimizes interference when traffic is heavy on the far side of the intersection – Customers access buses closest to crosswalk – Intersection available to assist in pulling away from curb – Buses can service customers while stopped at a red light – Provides driver with opportunity to look for oncoming traffic including other buses with potential customers 	<ul style="list-style-type: none"> – Conflicts with right turning vehicles are increased – Stopped buses may obscure curbside traffic control devices and crossing pedestrians – Sight distance is obscured for crossing vehicles stopped to the right of the bus. – Through lane may be blocked during peak periods by queuing buses – Increases sight distance problems for crossing pedestrians
Far-Side	<ul style="list-style-type: none"> – Minimizes conflicts between right turning vehicles – Provides additional right turn capacity by making curb lane available for traffic – Minimizes sight distance problems on approaches to intersection – Encourages pedestrians to cross behind the bus – Requires shorter deceleration distances for buses – Creates traffic flow gaps for buses re-entering the flow of traffic at signalized intersections – Allows bus routes that operate with signal priority to reap benefits of the technology at signalized intersections. 	<ul style="list-style-type: none"> – Queuing buses may block intersections during peak periods – Increases sight distance obstruction for crossing pedestrians and vehicles – May increase number of rear-end accidents since drivers do not expect buses to stop again after stopping at a red light
Mid-Block	<ul style="list-style-type: none"> – Minimizes sight distance problems for vehicles and pedestrians – Passenger waiting areas experience less pedestrian congestion 	<ul style="list-style-type: none"> – Requires additional distance for no-parking restrictions – Encourages customers to cross street at mid-block (jaywalking) – Increases walking distance for customers crossing at intersections and for transferring customers

Source: FTA web page (http://www.fta.dot.gov/12351_4361.html)

A summary of advantages and disadvantages to each type of stop location is provided in Table 3.7. In general, far-side bus stops are preferable, particularly at signalized intersections, though near side or mid-block stops may be justified in some situations. When two or more bus routes operate along the same corridor, stops should be consolidated to facilitate ease of transfers, provide a single location for all transit activity, avoid unnecessary crosswalk movements, and minimize confusion as to where customers should wait to catch their bus. However, for a group of bus lines operating along the same street, in the same direction, serving the same intersection (such as in the downtown environment), it may be necessary to implement two stop locations (e.g. nearside and farside) to minimize congestion and allow for required turn movements, under the following circumstances:

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- Some bus lines will queue up to make a right turn while other lines continue through the intersection (unsafe right turn movements)
- Lack of space availability and no room to lengthen zone due to business owner objection, jurisdiction refusal to extend, a loading zone being located behind the current stop, etc.)

The following renderings (Figures 3.5-3.8) illustrate a typical bus stop/zone design and offers guideline for near-side, far-side, and mid-block locations. Transit Cooperative Research Program (TCRP) Report 19 “Guidelines for the Location and Design of Bus Stops” (1996) provides a more detailed discussion. Metro also adopted its own Transfers Design Guide in 2018 – see Section 2, page 12 for more information.

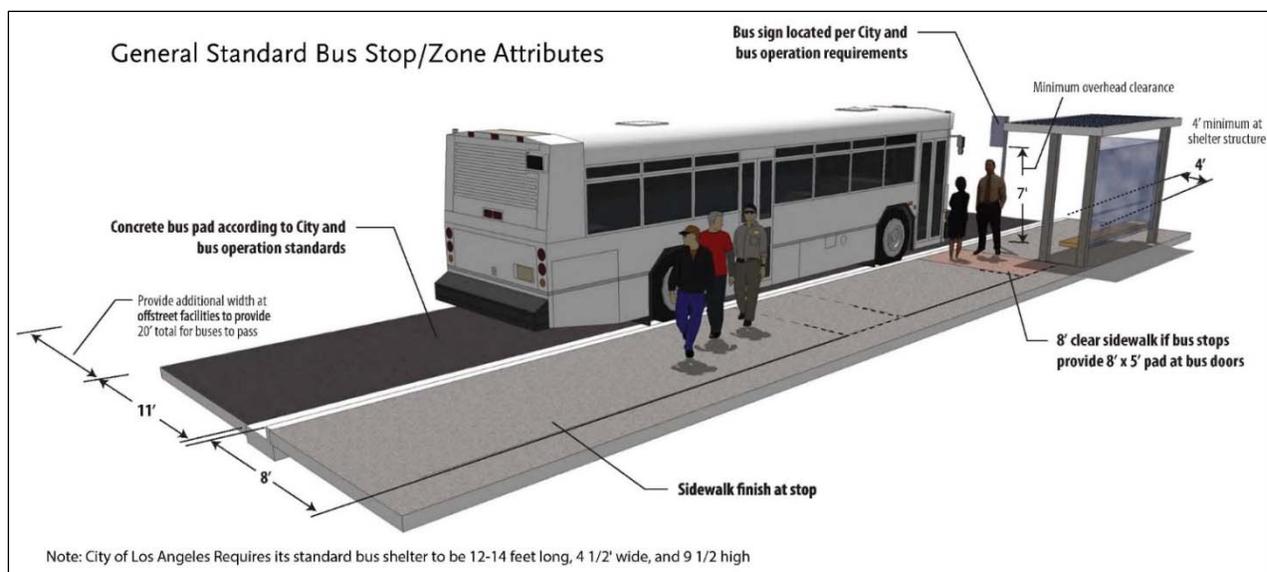


Figure 3.5 General Standard Bus Stop/Zone Attributes

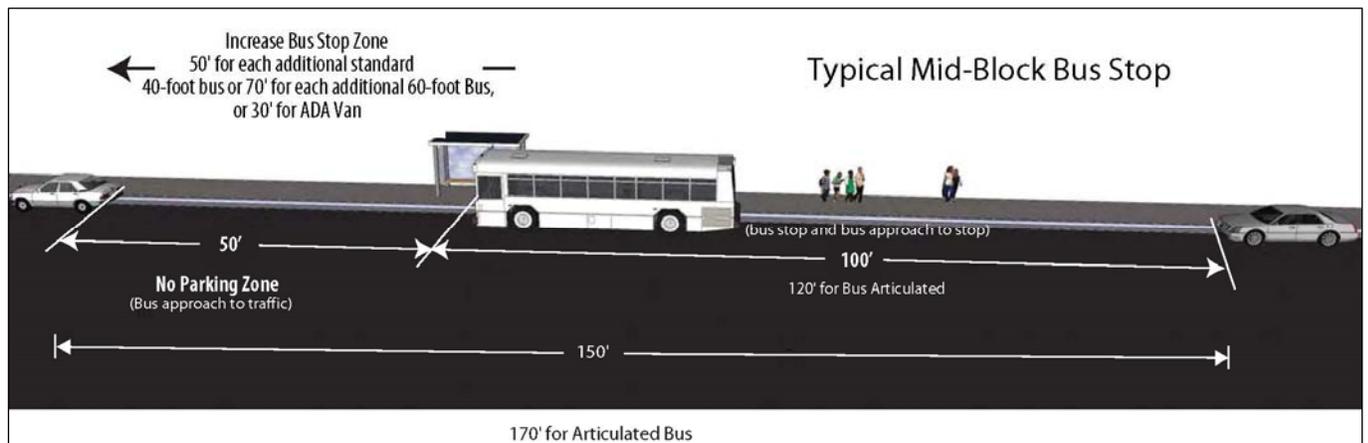


Figure 3.6 Typical Mid-Block Bus Stop

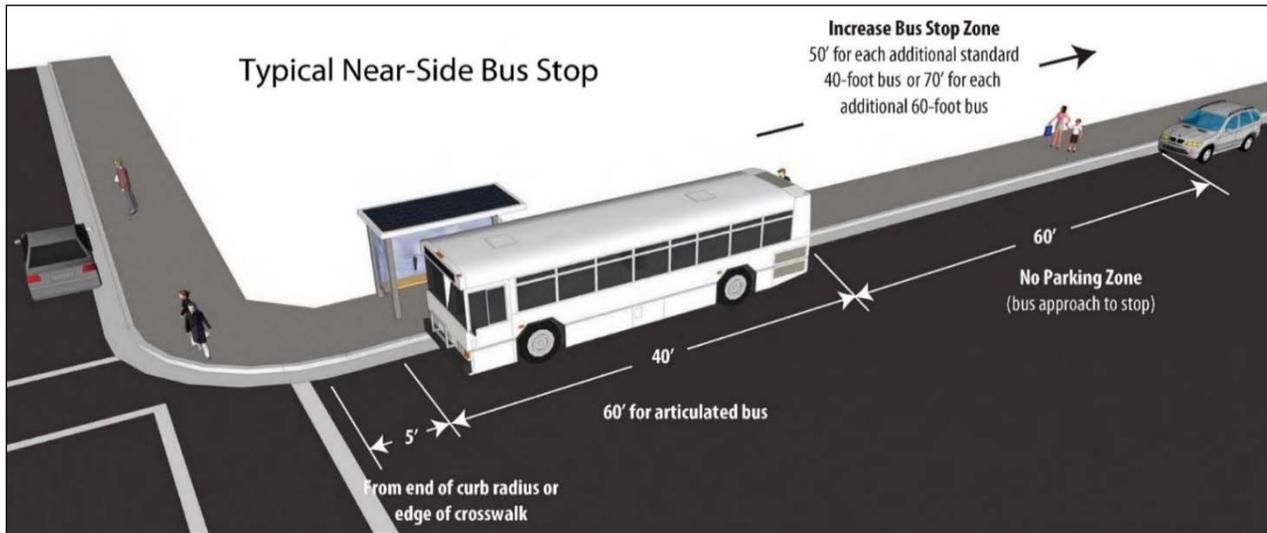


Figure 3.7 Typical Near-Side Bus Stop

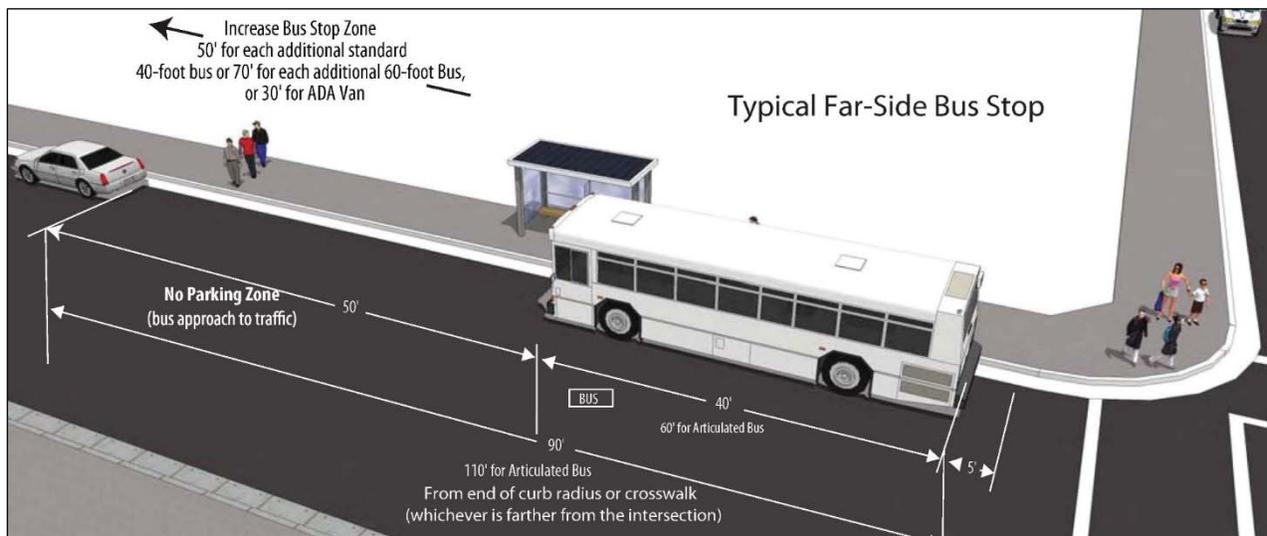


Figure 3.8 Typical Far-Side Bus Stop

3.7 Vehicle Assignment

Metro’s transit system consists of light rail, heavy rail, and bus operations. Metro’s goal is to ensure a consistent basis for assigning vehicles to facilities to meet operating needs and provide equitable access to the newest vehicles across the Metro network to enhance quality of service.

- **Buses:** Buses will be assigned to individual facilities based on vehicle size requirements for lines supported by each facility. The fleet is also distributed to ensure the average age of fleet is consistent across each division for each bus type, so that all areas may have some service delivered using the newest buses.

- **Articulated Buses:** The G Line operates with a dedicated fleet of 60' higher capacity articulated buses. The advantage of the deployment of articulated buses is the opportunity to reduce vehicle requirements and service hours while maintaining high ridership capacity; however, deployment should not increase service intervals (i.e. reduce frequency) to the point where service quality is degraded. For this reason, bus lines with a peak headway of 5 minutes or better are ideal candidates for this type of bus. In evaluating services for higher capacity articulated buses, other factors must be considered including facility compatibility, street design, and operational factors such as buses that operate on a mix of lines during their operating day. The deployment of articulated buses must also be coordinated with the efforts to convert the Metro fleet to fully zero-emission buses.
- **Light Rail:** Cars will be assigned to individual lines based on facility compatibility, the deposition of the feet during mid-life modernization programs, and age so that no single light rail line must rely on the oldest rail fleet. Ideally, 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/training for mechanics who work on the different fleets. There is also a weight restriction that precludes the P2550 light rail cars from being assigned to the C Line along the I-105 freeway.
- **Heavy Rail:** Assignment policy is not applicable to heavy rail. The B and D Lines operate out of the same division, with the same vehicle type.

3.8 School Trippers

School trippers are extra service operated to protect against overcrowding on bus lines serving schools. Metro's policy on school trippers is based on FTA regulations (49 CFR Part 605). These regulations are directed at protecting the private sector against unfair competition and ensuring that FTA funding is focused on providing services that meet the needs of the general public. School tripper service may be operated if the following criteria are met:

- There is sufficient demand to warrant the operation of a tripper that cannot on average be accommodated within the load factor applicable to the regular service available;
- There are sufficient resources to operate a tripper;
- The school tripper will not result in a significant increase in travel time (no more than 5 minutes extra) for regular customers if the service is to be deviated via a school; and
- The school tripper is operated as part of the regularly scheduled public transportation service and is included in such schedules and available for any person to ride.

School tripper service must meet the following requirements:

- All school trippers must fully comply with established policies and procedures;
- All regularly scheduled school trippers must be published on public timetables;

- All locations where trippers board or alight customers, including the bus stops at deviated routes, must be marked with Metro signage including the bus line numbers servicing the stop;
- School tripper changes must be provided to the public by a service change notice and/or on the Metro website at metro.net; and
- Requests for new school trippers or modifications to existing school trippers (bell time changes, etc.) will be considered when a notice is given at least 30 days in advance of the school year starting, providing ample time to complete an appropriate analysis of the request and to allow appropriate notification of changes to the public.

School tripper services changes must comply with the following procedures

- The Service Development's Scheduling section is responsible for ensuring that all school trippers in their respective service area fully comply with Metro's School Tripper Policy as discussed herein.
- Uniform documentation standards for daily school tripper arrangements must be employed. This includes standardizing the documentation form and oversight of the information being input into the scheduling system to ensure accuracy. All requests for new school trippers and modifications to existing school trippers must be logged into the scheduling system regardless of whether the requested new or modified school tripper is implemented.
- The Scheduling team is responsible for working with school districts in their service area which use school tripper service, where special events and bell-time changes are disseminated to Metro through communication with district staff.
- The information fed to transit apps and trip planners, such as Transit App and Google Transit, is made available via a General Transit Feed Specification (GTFS) compatible feed which is updated weekly to reflect school tripper service changes captured in the transit service scheduling software calendar utilized by Metro.

3.9 Charter Service

As a grantee of Federal funds, Metro is prohibited from using its federally funded equipment and facilities to provide charter service except on an incidental basis and when one or more of the applicable exceptions below apply:

- Charter service shall be incidental to the mass transportation service and shall be provided only during times of the day when vehicles are not needed for regularly scheduled service.
- Charter service will only be considered when one of the following exceptions apply:
 - There are no willing or able private charter operators;

- When there is a formal agreement regarding the provision of charter services between the recipient and all private charter operators who have been identified to be willing and able; and
 - For government or certain non-profit organizations, if the trip involves a significant number of handicapped persons, or if the organization is a qualified social service agency, or if it receives public welfare assistance funds whose implementation may require transportation services.
- All requests for charter service must be approved by the Chief Executive Officer and may require a waiver from the FTA. Petitions for a waiver should be requested in writing 90 days in advance of the event whenever possible.
 - The rates for charter service shall equal or exceed the annual fully allocated cost, including depreciation, of providing charter bus operations, and Metro shall deduct the mileage and hours from the useful life of the buses.
 - The operation of charter service also must comply with relevant state laws, including Section 30630.5 of the California Public Utilities Code.

Charter service is the use of buses, vans or facilities (rail system) to provide a group of persons under a single contract, at a fixed charge, with the exclusive use of the vehicle or service to travel together under an itinerary either specified in advance or modified after having left the place of origin. Generally, for service not to be considered charter, it must meet the following tests:

- Be available to the public;
- Operate within the system’s normal scope (existing routings, fit within normal hours of operation and established fare structure);
- Provide a published timetable; and
- Customers must pay their own fare.

3.10 Special Event Service

Special event services are bus routes designed to take customers to a specific venue and are not part of regularly scheduled operations. Metro will provide service under contract to other entities only if the provision of these services does not interfere with Metro’s ability to meet regularly scheduled service obligations and fits within the scope of the agency’s regular operation in terms of route structure, fares, and span of service. Special event services will be provided on a full cost recovery basis and in conformance with the agency’s charter bus policy, which is consistent with FTA Charter Bus regulations.

3.11 Service Transfer Guideline

The regional public transit network in LA County consists of 17 “Included or Eligible” fixed route operators (including Metro). Included operators (and routes) are those that were operating within LA County in 1971 at the time of adoption of the State of California Transit

Development Act/State Transit Assistance statute. Eligible operators (and routes) are those added to the Formula Allocation Procedure (FAP) since that time.

Much of the funding for operation of “Included or Eligible” fixed route public transit service in LA County is distributed according to an adopted FAP. The FAP allocates sales tax receipts for public transit each fiscal year in support of public transit throughout the region. Many of the “Included and Eligible” systems operate under the guidelines of the “reserve service areas” established in 1971. Municipal operators have also grown, providing an expanded route network that has improved connections to Metro’s regional lines. There are also numerous Local Return fixed route transit providers who are not eligible for FAP funding but instead are funded through Propositions A and C (1990 sales tax initiative), Measure R (2008 sales tax initiative), and Measure M (2016 sales tax initiative). These operators are funded as “Local Return” operators (see Appendix B for a list of operators funded as Local Return and/or Included/Eligible Municipal operators).

Policy guidance states that the network should be well integrated, coordinated, reduce service duplication, and simplify service. Therefore, the evaluation of transit corridors for consideration to be operated in the future by another operator should include:

- Existing performance relative to the system average;
- Value to the customer through integration into an established nearby transit provider;
- Net cost to each operator and the region;
- Completion of another operator’s route network;
- Provide improved connections to a municipal operator’s established network;
- Impacts to existing and projected ridership;
- Generation of a net cost saving to Metro based on Metro’s calculation of the FAP impacts for all service realignment proposals.

Any transfer of directly operated Metro services to a municipal or contract operator must adhere to the terms and conditions governing such transfers within the adopted collective bargaining and other superseding agreements between the affected labor unions and Metro.

If a proposed service change is adopted that results in a reduction of service, Metro should reinvest at least half of the net savings (operating cost minus customer and FAP reduction) to improve service on Metro’s core network of regionally significant lines in the service area from which the savings were drawn.

Any significant service modifications will be subject to review under the latest FTA procedures for adherence to Title VI of the Civil Rights Act of 1964, as amended, the approval of the appropriate Metro Service Council(s), and the local transit provider’s Board of Governance, and must be in compliance with local, regional, and labor legislation or agreements. Finally, the agency that assumes service will be required to maintain or improve the days, span, and frequency of the existing Metro service for at least a two-year period for which Metro will

include such operation through the FAP. In addition, the assuming agency must be a participant in the regional TAP program to minimize fare change impacts.

3.12 Alternative Service Delivery Options

Alternative service delivery options generally refers to services not directly operated by Metro, such as contract services, municipal and Local Return operators, taxis, and other flexible destination operations. These alternatives can complement traditional transit service. In addition, Access Services provides mandatory ADA complementary paratransit services for functionally disabled individuals in Los Angeles County as required by federal ADA law. Access Services transportation service is available for any ADA paratransit-eligible individual to any location within 0.75 of a mile of any fixed route bus operated by the Los Angeles County public fixed route bus operators and within 0.75 of a mile around Metro Rail stations during the hours that the systems are operational. Complementary paratransit service is not required to complement commuter rail and commuter bus services, since the federal ADA law does not require that these services provide complementary paratransit service.⁸

⁸ accessla.org/about_us/overview.html

SECTION 4: BUS SERVICE PERFORMANCE EVALUATION

This Metro TSP establishes a set of performance criteria and standards that balances optimization for efficiency and productivity with customer experience measures of success. Optimization of key performance indicators ensures that the services being provided generate the maximum benefit in terms of ridership at the lowest cost. Customer experience criteria measure how well the transit system can attract customers to use the system more often and for new trip purposes.

4.1 Route Performance Index

The Route Performance Index (RPI) is a conventional industry measure used to ensure transit services are effective and provide a reasonable return on investment. Metro's RPI is designed to provide an objective measure of bus route performance relative to system performance. The index is based on system ridership and financial targets from the current fiscal year Metro Budget.

This measure is applied to all Metro bus lines that have been in operation for more than one year, allowing time for new lines to reach a level of maturity where riders have adapted to their availability. The RPI is used to identify under-performing lines. Specific corrective actions are taken during the service change process. Corrective actions may include marketing, service restructuring, implementing an alternative service, or discontinuation of service.

Defining RPI Variables

The RPI considers the following three variables in creating the index. No weight is given to an individual measure; rather the selected statistics represent all facets of the operation in terms of cost efficiency, service effectiveness, and customer use.

- **Utilization of Resources:** Passenger boardings per revenue service hour (RSH) are used as a measure to determine how effectively resources are used on a given line. This measure is determined by dividing the total number of boardings by the RSHs operated. A route having a higher number of boardings per RSH represents a better utilization of the service provided.
- **Utilization of Capacity:** Passenger miles per seat mile is the measure used to evaluate how the seating capacity of the system is being used. Passenger miles are calculated by multiplying the average distance traveled per customer by the number of customers using the service. Seat miles are calculated by determining the number of seats per vehicle by the number of service miles operated. A higher resulting number indicates greater utilization of service capacity.
- **Fiscal Responsibility:** Subsidy per passenger is the measure for fiscal responsibility. Subsidy refers to the amount of public funding required to cover the difference between the cost of operation and the customer fare revenues collected. Higher subsidy services require more public funding support per passenger boarding.

The formula for calculation of the RPI for each Metro Bus line is as follows:

$$\text{RPI} = ((\text{Passengers/RSH/System Avg.}) + (\text{Passengers Miles per Seat Mile/System Avg.}) + (\text{Subsidy per Passenger / System Avg.}))/3$$

Lines with an index of 1.0 perform at the system average, while lines with an index of less than 1.0 perform below the average. Lines with an RPI lower than 0.60 are defined as performing poorly and targeted for corrective action. Lines that have been subjected to corrective actions and do not meet the 0.60 productivity index after six additional months of operation may be discontinued, subject to Title VI, Metro Service Council, and Board approval processes.

The RPI is calculated and reported quarterly by Metro's Service Planning staff for use in developing revised service plans to improve route performance.

4.2 Customer Experience

Providing high quality mobility options that enable people to spend less time traveling on the transit network requires that service be available when and where customers want to travel, that service be competitive enough to have customers be willing to try transit over other options, and that service be attractive enough to ensure riders return for the same trip and ideally for more trips. Therefore, the recommended measures of success are aimed at evaluating the bus network implemented under the NextGen Bus Plan within these three elements, referred to as Find, Try, and Rely. These customer-focused measures help to balance the traditional metrics of productivity and efficiency (e.g. ridership, boardings per hour, subsidy per boarding). Several of these measures (italicized below) will be used to evaluate the network through the lens of equity.

Find - How well do people understand how effectively transit can serve their needs? Is the system easy to understand and use? Proposed measures include:

- Services and information are readily available
 - Percentage of trip ends within ¼ mile of transit stop
 - Trip planning apps and website usage rates
 - *Percent of public considering transit (survey-based)*
- Bus system is easy to understand and use
 - Percentage of out-of-direction travel
 - Percentage of route miles with all-day frequent service (<=15 min headways)
 - *Percent of public that understands how to use system (survey-based)*

Try - How can we encourage customers to try the regional transit system? (Metro and Municipal Bus Operators) Proposed measures include:

- Bus goes where/when customers want
 - *Percentage of trips compatible with transit by time of day and day of week*

- *Number of jobs and activity centers accessible within a 15-minute and 30-minute transit ride*
- Number of unique transit users
- Bus system is competitive
 - *Door-to-door travel times*
 - *Competitiveness of transit time to drive time*
 - System-wide boardings
- Coverage is adequate
 - *Population within ¼-mile of transit stops by frequency of service*
- Transit journeys are simple
 - Average number of transfers
 - Percent of trips that are one-seat rides

Rely - How can we provide services that customers can rely on for their travel needs?

Proposed measures include:

- Bus system is effective and productive
 - *Competitive transit paths for short, evening, midday, and weekend trips*
 - Number of frequent customers
 - Boardings by time of day and day of week
 - Boardings per revenue hours and miles
 - Cost per passenger mile
- Buses are reliable
 - Headway regularity on frequent routes
 - On-time performance
 - Real time arrival accuracy
- Customers are satisfied
 - Rides per week for frequent and infrequent users
 - *Percentage of customers satisfied with Metro services (survey-based)*

4.3 Service Evaluation Process

Services are evaluated monthly, quarterly, and biannually based on the network, lines and segments (geographic, time of day, and day of week). Services that are inconsistent with demand or do not meet system standards are identified for restructuring, reduction, or

discontinuation. Services that have potential for exceeding existing performance will be identified for possible enhancements as should markets that are currently not well served. The following priorities will be considered when restructuring the Metro system:

- **Priority 1** – Restructure services to increase system speed, on-time performance, service frequencies consistent with NextGen Bus Plan, productivity, and balance loads.
- **Priority 2** – Restructure services that are duplicative with Metro Rail, other Metro Bus lines, and Municipal and Local Return operator services. Such services will be identified for discontinuation, consolidation, reduction and/or reallocation to achieve greater productivity and cost efficiency.
- **Priority 3** – Restructure remaining services (constrained by existing budget) based on the service concept and to address major gaps and deficiencies. Prioritize these service adjustments.
- **Priority 4** – Develop new services (unconstrained) to address all gaps and deficiencies. Prioritize these new services.

Significant changes to municipal operator services are incorporated into the evaluation of existing and new services as possible enhancements to address identified gaps or deficiencies in service.

Service Change Performance Evaluation

Schedule adjustments to bus or rail should be evaluated shortly after implementation to determine if there are any obvious issues. This should include line rides and visits to the operating divisions to receive comments and recommendations from customers, operators and supervisors. Appropriate adjustments should be made as required. After three months of operations, the schedules should be evaluated in detail to begin the process of schedule adjustments for the next service change cycle.

Route modifications to bus service should also be evaluated after implementation based on the evaluation outlined above. The overall goals of the service changes such as reducing costs, improving connections, increasing bus speeds, and increasing ridership, among others, should have near term goals that are established prior to the service change process. About 6 months after service implementation, the performance of the changes should be evaluated relative to the established goals. Remedial actions, if necessary, should be developed and considered for the next service change cycle.

SECTION 5: METRO MICRO ON DEMAND SERVICES

Some areas of LA County are difficult to serve with fixed-route transit due to terrain, narrow streets, dispersed lower density destinations, and relatively low travel activity. Metro offers microtransit service, branded as Metro Micro, to select locations in its service area to fill in gaps in fixed-route systems and make public transit more convenient for more people. Metro Micro uses smaller vehicles than fixed-route service, which facilitates the ability to serve locations that are inaccessible to transit buses and operate at a lower cost per revenue service hour.

Background

Metro launched two pilot programs to leverage demand-responsive technology to improve mobility, customer experience, and system performance by providing additional first- and last-mile service options: Mobility on Demand and Metro Micro, a microtransit service. The Mobility on Demand pilot launched in January 2019 and operated for 12 months. Metro partnered with Via, a provider of on-demand ride sourcing services, to develop on-demand technology to increase access to Metro's transit system by offering service to and from three of Metro's transit stations: North Hollywood, Artesia, and El Monte. This pilot program was funded in part by a \$1.35-million Mobility on Demand (MOD) Sandbox Demonstrations grant from the FTA. The system was operated utilizing private vehicles. The Mobility on Demand pilot concluded in January 2021 and the three Mobility on Demand zones were transitioned to become part of the Metro's on-demand, van-based rideshare service branded as Metro Micro.

Metro Micro was launched in December 2020 by LA Metro as a three-year pilot. After an extension to further study the service post-pandemic, Metro Micro became a permanent service on March 16, 2025. Metro Micro was designed in parallel with the NextGen Bus Plan. The first two zones (LAX/Inglewood and Watts/Willowbrook) were launched in December 2020. The three Mobility on Demand zones were added to the Metro Micro program in January 2021. Two additional Metro Micro zones launched in June 2021 (Highland Park/Eagle Rock/Glendale and Altadena/Pasadena/Sierra Madre). The Northwest San Fernando Valley zone was launched in September 2021. The overlapping Artesia and Watts/Willowbrook zones were combined into an over 31 square mile mega zone (Watts/Compton), and the final pilot zone at UCLA/Westwood launched in December 2021.

The pilot zones were coordinated with the NextGen Bus Plan to replace some lower ridership fixed route lines or route segments where Metro Micro service could better serve these hard-to-serve areas, though this was only one of a range of use cases being tested. The target maximum size for each zone was originally set at no greater than 20 square miles to ensure the goal of no more than an average 15-minute wait time for pick up could be consistently achieved. However, a number of zones were expanded to help replace some low performing fixed route services during NextGen Bus Plan implementation.

5.1 Micro Service Overview

Metro Micro is operated with passenger vans within eight designated zones, intended to test a range of use cases including areas where fixed route service has not been effective or is unable to access parts of a community. Metro partnered with a third-party vendor for the

technology, staffing, maintenance and vehicles to support this pilot program, while Metro provided the van operators and staff to manage, training materials, guidelines, and oversight for the operation. In March 2025, the operating model changed with a new technology vendor and a new vendor to manage operations including the provision of operators and vehicles.

Micro offers customers the ability to book rides within designated zones on the same day and up to a week in advance. Riders can reserve rides by calling Metro’s Call Center, through an online reservation system, or via the service’s dedicated smart phone application. Customers are directed to a virtual stop location (a designated pick-up or drop-off location which may be but is not necessarily a Metro bus stop or rail station) to be picked up by the service. All designated pickup and drop-off locations are located within the zone and must be ADA accessible. Stops are virtual because they typically do not have any signage indicating that they are service points, and they can be activated or deactivated in real-time as conditions change.

The service is designed to provide short trips within a zone where each rider would have to wait no more than 15 minutes from the time a reservation is made to when they are picked up at a designated pickup location, to facilitate pickup within a 10-minute window, and drop off at another virtual stop within the same zone. Based on experience to date, Metro Micro generally serves short trips of approximately 20 minutes in vehicle time and 1-5 miles in distance on average. These short trips are intended to serve as connections to other transit options such as Metro-operated bus and rail services and municipal operators.

Metro Micro Capacity/Load Profiles

The Micro Passenger Loading Standard expresses the maximum average ratio of customers to vehicle size and frequency by direction for a one-hour period that should not be exceeded for at least 95% of all hourly periods. Vehicles used for Metro Micro will have a load standard of 1.0 x available seats in each van. The largest vehicles have a seating capacity for up to 10 passengers; a range of seating capacities of the vans used.

Table 5.1 Metro Micro Vehicle Capacity

Metro Micro Vehicle Type	Seats per Vehicle	Peak Passengers per Seat	Off-Peak Passengers per Seat	Maximum Passengers Onboard
Large Van	7 + 2 Wheelchairs	1.0	1.0	9
Small Van	5	1.0	1.0	5
Small Wheelchair Accessible Vehicle	5 or 3 + 1 Wheelchair	1.0	1.0	5

Minor service changes may be conducted at any time. This includes:

- Adding, removing, or relocating virtual stops for safety, convenience, or operational reasons
- Minor changes to zone boundaries
- Reduction or expansion of revenue service hours
- Reduction or expansion of operating hours

A major service change for the purposes of microtransit is a change that exceeds 20% in any one zone: Such changes would require a public hearing similar to bus service changes. Where possible, such hearings should be held within the Micro zone.

5.2 Metro Micro Zone Boundaries

As of April 2025, Metro operates eight Metro Micro zones across Los Angeles County, ranging in size from <10 square miles to >30 square miles. All zones include at least one major transit station, and most zones include areas not served by fixed-route transit. These zones were determined through multi-stage process in which equity concerns (e.g. areas where it is difficult to obtain private Transportation Network Company (TNC) rides), coverage of areas without fixed-route service, and expanding access to rail and busway service. Details of each zone are provided in Table 5.1

Table 5.2 Metro Micro Zone Details

Zone	Launch Date	Zone Sq Miles	Weekday Hours of Operation	Weekend Hours of Operation	Hours in Operation per Week
Watts/Compton	Dec 2020	31	5a–11p	5:30a–9:30p	122
LAX/Inglewood	Dec 2020	19.5	5a–9p	5a–9p	112
El Monte	Jan 2021	23.4	6a–10p	10a–10p	104
North Hollywood/Burbank	Jan 2021	17.4	6a–10p	10a–10p	104
Highland Park/Eagle Rock/ Glendale	June 2021	23.3	5:30a–10p	5:30a–10p	112
Altadena/Pasadena/Sierra Madre	June 2021	23.2	5:30a–10p	5:30a–10p	112
Northwest San Fernando Valley	Sept 2021	20	5:30a–10p	5:30a–10p	112
UCLA/Westwood/VA Medical Center	Dec 2021	7.1	9a–9p	Closed	60
TOTAL		164.9			

In determining future changes to zone boundaries, Metro will consider equity impacts, connections to high-quality fixed-route service, geographic and topographic factors that affect fixed-route access and walk/rollability, zone size and shape, and origins and destinations. The role of each of these factors in determining Micro zones is described below:

- **Equity Impacts:** Similar to fixed-route service, Metro must consider the impact on Equity Focus Communities and target populations such as seniors and students, when determining changes to service zones. Populations with higher transit dependency, lower incomes, and historically and/or currently marginalized communities are prioritized for improved access. In particular, Metro should consider how microtransit may be able to address inequities in availability of TNC services on the private market.
- **Connections to high-quality fixed-route service:** Though Metro’s fixed-route system reaches a high proportion of Angelenos, there are areas that are served only infrequently or not at all, due to a variety of factors. Microtransit service connects these areas to high-quality fixed-route service and provide an alternative to single-occupancy vehicles for shorter trips.

- **Geographic and topographic factors that affect fixed-route access and walk/rollability:** Because the service uses smaller vehicles, microtransit can serve areas where transit buses cannot go due to their size and impact on neighborhoods. Areas with hilly terrain or narrow streets often cannot accommodate transit buses but are servable by microtransit vehicles. Hilly areas also suffer from poor walk/rollability, making the traditional 0.25 mile walking distance to transit physically challenging.
- **Zone size and shape:** Microtransit works best with zones 20 square miles or smaller, with shapes that are as close as possible to circular. With larger zones, it is easier for all available vehicles to be pulled to one area of the zone, leaving many patrons out of reach when they attempt to book a ride. Irregularly-shaped zones can lead to vehicles ending up in a “sock” where they are far from many origins and destinations within the zone. Based on efficiency metrics of existing zones, any new zones should have a maximum longest diagonal of 8 miles (longest distance between two zone edges). Similarly, zones that are too small to generate significant ridership should be avoided. A zone’s diameter should exceed a comfortable walking distance (> 1 mile), and in general, zones should be at least 5 square miles, and impacts of geography and topography are also important to determining zone boundaries. Obstacles such as freeways, railroad tracks, the Los Angeles River, etc. should have multiple passing points within the zone and reduce the complications of crossing a zone. Zone boundary design should avoid creation of “dead corners” at the edges of zones that are difficult to get in and out of.
- **Origins and destinations:** To efficiently allocate resources, microtransit zones should have at least one major transit access point (a rail station, busway station, transit center, etc.) as well as a variety of residential and commercial uses.

5.4 Microtransit NTD Reporting

Metro reports Metro Micro as a Demand Response – Purchased Transportation (DR-PT) mode. FTA requires that Demand Response modes report the following data monthly:

- Unlinked passenger trips
- Vehicle revenue miles
- Vehicle revenue hours
- Vehicles operating in maximum service

FTA defines Revenue Service Hours differently for Demand Response than for fixed-route modes. This definition is found in the NTD Reporting Manual for the current year.

DR-PT is also reported during the Annual reporting. Details on the elements required can be found in the NTD Reporting Manual for the current year and are much more extensive than the monthly reporting.

5.5 Microtransit Performance Evaluation

The primary performance evaluation measures for Metro Micro are:

On-Time Performance (OTP): The percentage of rides which pick up or drop off the passenger within one minute of the time stated at booking. OTP is calculated based on the customer's booking method:

- **Leave Now:** Rides booked as "Leave Now" are given an expected pickup time and ride window. This time will be the earliest time the platform was able to schedule their ride; the ride may be scheduled earlier than original expected pickup time if an earlier ride becomes available. Rides are considered on time if they pick up the customer before one minute past the given window, which is established at booking time and may be any number of minutes.
- **Leave At:** Rides booked as "Leave At" are provided a 10-minute window within which the pickup may occur. Rides are considered on time if they pick up the customer before one minute past the end of the window.
- **Arrive By:** These rides are scheduled to get the customer to their destination by a specific time. Rides are considered on time if they drop the customer off before one minute past the Arrive By time in the booking.

Validated Complaints per 10,000 Boardings: This is based on complaints received via Metro's Customer Relations team and in-app feedback. The goal for this metric is at or below 50. The denominator is an order of magnitude below the analogous bus and rail metric because Metro Micro has a lower overall operational footprint, with a monthly total ridership of 50,000-75,000 boardings.

Passengers per Revenue Service Hour (PRSH): Number of completed passenger boardings divided by the number of revenue service hours. Expectations vary by zone, but the overall goal is at least 4 PRSH.

Ride Rating: Customers using the web app are prompted to rate their ride after drop-off and have an opportunity to provide feedback as well.

Combined Cancellation and No-Show Rate: This rate is a proxy measure of how much confidence people have that their ride will arrive, and how well the service matches their transportation needs. People are more likely to cancel or no-show if they are looking for a better option than their Metro Micro booking offers. The service is expected to keep this rate at or below 37% of all bookings.

Revenue Service Hours (RSH): Total time that vehicles spend in zones ready to serve customer rides. This metric excludes deadhead and both paid and unpaid breaks but includes standing time where a vehicle is ready for rides but has none scheduled. The Federal Transit Administration National Transit Database reporting uses a different definition that also excludes standing time and categorizes some empty trips as deadhead instead of RSH.

Micro Real-Time Information: On-demand transit is heavily reliant on real-time information on dynamic pick up and drop off schedules. Real-time information is used in the following ways:

- Customers who book via the web portal or app can see an ETA, and as the pick-up time approaches, track their vehicle on the app map.
- Customer Call Center agents can check the status of rides for customers who do not have access to the web portal or app.
- Metro staff and Operations Contractor staff have access to real-time data on all vehicle positions and status, which they use to monitor service and troubleshoot performance issues.

Wheelchair Boardings and Abandoned Rides: Abandoned rides are those rides that are booked, but that no vehicle arrives to pick up. This may happen due to a mechanical breakdown, excessive operator absences, or unusual traffic conditions that make an area of the zone less accessible or inaccessible. These instances are analogous to cancelled runs in bus service, but another vehicle will not be scheduled to pick up the passenger unless they re-book a ride. Any ride abandonment needs to be investigated and addressed.

Ideally, in a floating 6-month period, Micro service will average no more than 0.5% in pass-ups of customers who use wheelchairs or other mobility devices. For Micro service, a trip is considered to be a wheelchair pass-up if it is unmatched, which is when a ride is booked correctly as an accessible trip but an accessible vehicle is not able to be brought to the customer to pick them up. Operations Contractor staff is responsible for monitoring for unmatched (abandoned) rides and, if one occurs, attempting to contact the customer and assisting them with new travel arrangements. Should the average increase to over the 0.5% threshold, Metro staff will work with the Operations Contractor to adjust service to better serve the ridership patterns of the zone in such a way so as to minimize unmatched/abandoned rides.

SECTION 6: CUSTOMER INFORMATION AND AMENITIES

Customer information instructs both regular and infrequent customers how to use transit as a viable mode of transportation to and from their destinations. Clear, accurate, and timely information is an important adjunct to service quality, particularly when bus and rail services are not operating as planned. Amenities aid in the comfort and security of customers.

6.1 Customer Information

Both regular and infrequent customers need to know how to use transit: where to go to access it, where to alight to access their destination, whether transfers are required, when services are scheduled to depart and arrive, and how planned and unplanned service changes or disruptions impact travel, especially when they are traveling to a location they rarely visit or that is new to them. Information must be provided in accessible formats. Metro provides customer trip planning information via telephone, through customer service representatives. Metro buses, railcars, and stations also include announcement systems for stops and stations as well as other general service information.

- **Signage** at transit infrastructures such as stations and shelters, signs directing motorists to Park & Ride lots, and bus stop signs that indicate the presence of service to people not currently using transit.
- **Audible Announcements** at bus stops, rail stations and on-board vehicles to assist customers with visual impairments and customers unfamiliar with the route or area.
- **Online Information** is available 24 hours a day to anyone with Internet access and includes:
 - Real-time information streamed to many mobile devices via transit information applications and displayed on Google, Apple, and Bing Maps trip planners as well as applications such as Transit, Moovit, and Citymapper. Text/SMS messaging have expanded significantly as smart phones have become a common part of life for many. Email alerts are also shared with customers who sign up to receive them.
 - Metro’s own website metro.net:
 - Route maps and timetables, fare information, detour notices, service change information, cancelled service alerts, special event detours, and other service-related information
 - Metro's blogs, “The Source” and “El Pasajero”
 - Specialized guides (Bikes, Riders with Disabilities, Safety & Security)
 - Commuter program information (carpools, vanpools, employer programs, etc.)
 - News and media information
 - Latest information on Metro projects and programs
 - Contact information
 - Metro’s social media accounts including Facebook, X (Twitter), and Instagram.

- **Bus and Train Real-Time Information Signage:** Accurate, timely, relevant, and readily available trip information is useful for reassuring customers when the next transit vehicle will arrive or how long the expected delay time is if there is a service disruption. It should provide enough information to help them decide whether to continue to wait for the next transit vehicle, consider alternate routes, or take another mode of transportation to complete their trip. Real-time information is provided within selected transit shelters across the Metro network. Metro piloted e-paper real time information signs at a limited number of bus stops as an amenity in FY23. The ePaper technology provides a low power, better resolution on multi-sized tablets and displays. Metro has since expanded its use of ePaper technology to display real-time information, with ePaper real-time displays installed along Vermont Av, the new LAX/Metro Bus Center, and are in development at Patsaouras Plaza and throughout the Southeast Los Angeles region. The City of LA's Sidewalk and Transit Amenities Program (STAP) is incorporating real-time information within all new bus shelters being installed as part of the program.
- **Printed and Distributed Information** such as timetables, maps, service change notices, customer newsletters, etc., are made available at multiple locations such as Metro's own Customer Service Centers, regional libraries, and recreation and community centers, on board affected and adjacent routes, and by mail.
- **Posted Information** such as system maps, bus cubes posted at stops, stations, and on board transit vehicles.
- **Route Signage Convention** at stops and on transit vehicle head signs assist customers to quickly identify what stops to wait at and what transit vehicle to board as well as direction of travel and location the lines terminate at, as well as names of major corridors served.
- **Wayfinding** is the process of supporting the ability to navigate using informational signage, system/route maps, kiosks, bus cubes, directions, etc. so that customers can easily determine where they are, where they want to go, and how to get there.
- **Visual Displays** to assist customers with hearing impairments and to supplement on-board announcements that may be muffled by other noise.
- **Customer Information Panels (CIPs)** are interactive touch screen panels that display vehicle arrivals, service alerts, system and local maps, Metro Arts programming, advertising, and Agency public service announcements.

6.2 Customer Amenities

Customer amenities are those elements provided at transit stops, centers, and stations to enhance comfort, convenience, and security. Amenities include items such as shelters, benches, trash receptacles, lighting, restrooms, vending machines, and emergency telephones and intercoms. In some instances, Metro coordinates with municipalities to provide appropriate amenities.

Table 6.1 *Customer Information and Amenities*

Amenity	Service Type	Minimum Allocation
Shelters:	Heavy Rail:	n/a
	Light Rail:	At least 80 linear ft. per bay
	Bus Facilities:	At least 6 linear ft. per bay
Seating:	Heavy Rail:	At least 12 seats
	Light Rail:	At least 10 seats
	Bus Facilities:	At least 3 seats per bay
Information Displays:	Heavy Rail:	At least 12
	Light Rail:	At least 10
	Bus Facilities:	At least 3
LED Displays:	Heavy Rail:	At least 8 arrival/departure screens
	Light Rail:	n/a
	Bus Facilities:	n/a
TVMs:	Heavy Rail:	At least 2
	Light Rail:	At least 2
	Bus Facilities:	n/a
Elevators:	Heavy Rail:	At least 2
	Light Rail:	At least 2 for elevated/underground
	Bus Facilities:	At least 2 for multi-level terminals
Escalators:	Heavy Rail:	At least 4 (2 Up/2 Down)
	Light Rail:	At least 2 for multi-level terminals
	Bus Facilities:	At least 2 for multi-level terminals
Trash receptacles:	Heavy Rail:	At least 6
	Light Rail:	At least 2
	Bus Facilities:	At least 1 per 3 bays/2 per facility

- **Benches** provide seating for waiting customers, help identify the stop or station, and provide an affordable alternative to shelters. Benches are provided by the local jurisdiction in coordination with Metro.
- **Elevator/Escalators** provide accessibility for those who otherwise cannot use stairs to elevated or lowered station stops.
- **Lighting** increases visibility and security and discourages misuse of bus stops when transit operations are not in service.
- **Public Restrooms** may be provided at major transit centers and maintained for public safety and convenience.
- **Shelters** provide waiting customers with protection from climate conditions and help identify the stop or station. Metro does not own or install shelters but coordinates with local jurisdictions on placement where appropriate. The NextGen Bus Plan includes an initiative to fund additional shelters across the Metro bus network in partnership with local jurisdictions.

- **Telephones/Intercoms** provide access to transit information and emergency services.
- **Trash receptacles** provide a place to discard trash and contribute to keeping bus stops and surroundings clean. Trash receptacles are placed at bus stop locations and maintained by individual municipalities.

Metro provides a minimum set of customer amenities at all rail stations and major Metro-owned, off-street bus facilities that allow for boarding as summarized in Table 6.1.

6.3 Rail Stations and Bus/Multi-Modal Transit Center-Facilities

When transit service is not available near one's trip origin, driving to a Park & Ride lot or utilizing another first-last mile option such as a bicycle or scooter to transit may be a viable alternative. Station parking facilities, bus transit centers and their associated amenities, bicycle storage, and micro-mobility parking areas are important amenities for transit customers.

- **Park & Ride/Station Parking Facilities** are provided in close proximity to major stops and stations for transit customers who use cars to access a bus or train. Park & Ride facilities are usually provided at rail stations or bus transit centers such as the Metro El Monte Station and Harbor Gateway Transit Center. Park & Ride lots in suburbs serve as a staging area for commuter customers. Parking may be provided for transit riders at no cost or for a nominal fee, based on demand. Adjacent development and joint use parking are encouraged.
- **Bus Transit Centers and Stop Amenities:** Stations and shelters provide customers with enhanced comfort and safety. As part of the NextGen Bus Plan, Metro will continue to work with municipalities to maximize the number of bus stops with seating and shelter, as this function is led by municipalities. An emphasis will be made on allocating many of these amenities to Equity Focus Communities where the need for high quality transit is greatest.
- **Streetscape:** Streetscape and other design features such as landscaping, pedestrian countdown signals, bicycle racks, and well-designed crosswalks make it easier for pedestrians and bicyclists to access the stations.
- **Bicycle Storage** such as bicycle racks, lockers, and hubs may be provided at transit centers and stations where demand exists and space allows, and on transit vehicles. Bicycles may be transported on bus-mounted racks located in front of a bus or on board a rail car in designated spaces. Bike racks provide a simple, relatively low-cost approach and can hold many bicycles in a relatively small space, but they can be subject to potential damage and theft. Enclosed bicycle lockers and hubs provide added protection from theft and weather but cost more to install and operate, and require more space.
- **Micro Mobility Vehicle Parking:** At their July 25, 2019 meeting, the Metro Board adopted a parking ordinance to regulate parking of micro mobility devices such as electric **scooters**. Metro operated a two-year pilot where designated parking areas were established at selected stations and transit hubs for parking of micro mobility devices; the private firms seeking to park their vehicles at Metro sites must pay a fee for use of

the parking facilities.⁹ A permanent program was established following completion of the pilot and is being operated at the following stations: Wardlow, Willow A Line Stations, and 17th St/SMC, Expo Bundy, Expo Sepulveda, Culver City, La Cienega/Jefferson, 26th St/Bergamot, and Westwood/Rancho Park E Line Stations. The program is currently collecting and analyzing data to inform how we can best scale and manage the updated program moving forward.

6.4 Bus Stops and Bus Stop Amenities

Bus stops are locations along the route of a bus line where customers safely wait to board or alight from a bus in service. Bus stops consist of a pole with a sign that includes line number, destination and service qualification signage, and curb markings or parking restriction signage. Select bus stops also include a bus information cube affixed to the pole. Most bus stops are located along the curb of a street; others are located at offsite facilities such as transit centers or rail stations that are owned and maintained by Metro, or in some cases by the local municipality.

Metro has no jurisdiction over a bus stop beyond a bus stop sign post; amenities are installed by the municipality where the stop is located. This function is sometimes contracted to third parties who support installation and maintenance, usually funded by advertising revenues. The NextGen Bus Plan noted the importance of bus stop amenities such as seating and shelter, and Metro will work with municipalities to maximize the number of Metro bus stops with such amenities available. Metro is able to support the municipalities with technical assistance such as ridership data, as well as support obtaining grant funding for such amenities.

Bus stop and transit center facilities are often the first and last points of contact with the customer. These facilities are an essential component of transit infrastructure that direct customers to existing transit services, provide a safe and comfortable environment in which to wait for service, and facilitate safe and efficient transfers between services. Given their importance, which was confirmed in the NextGen Bus Study, it is vital that transit routes and schedules are developed in consideration of the quality, appropriateness, and availability of facilities.

Fixed guideway stations are stops along a fixed guideway segment and have features such as loading platforms, TVMs for pre-loading of TAP cards, shelters, benches, lighting, information displays, trash receptacles, bike racks and/or lockers, public announcement systems, security cameras, and emergency call boxes. Many are located adjacent to Park & Ride lots and customer pick-up/drop off areas.

Transit centers are high-volume transfer points for multiple transit services (bus and/or rail) and layover spaces for end-of-line bus storage and turn around. Features include customer

⁹ Planning and Programming Committee File #2019-0085; LACMTA Administrative Code Title 8: Metro Parking Ordinance

loading and alighting areas, benches, shelters, lighting, information displays, bicycle racks and lockers, trash receptacles, and bus layover bays.

Bus layover terminals are major offsite layover areas for multiple bus lines and may or may not allow for customer boarding and alighting. On-street bus layover zones are designated stopover points for buses at or near the end of the line.

Cost and minimization of customer disruptions are significant concerns when locating facilities for bus operations. Metro Operations staff continues to evaluate routes and layovers to reduce costs, improve efficiency, and maintain required access to restrooms for operators. As a key internal stakeholder in the environmental planning process, the Service Development Department should be involved early in the analysis of alternatives to and the development of mitigation measures to ensure adequate accommodations are incorporated to foster connectivity of future joint development or private projects.

Locating bus layover facilities (other than on-street stops) in heavily congested or urbanized areas increases the burden on the transit operator to find layover spaces for buses and operator restrooms. The extension of a line to a specific terminal may prove uneconomical and at the very least, adds costs to an already budget constrained operation. Metro continues to include such facilities in joint development projects where feasible to maximize the efficiency of bus terminal operations.

Capital costs of new support facilities are an important determinant; but more significant is the added operating cost that may be incurred due to inadequate facilities resulting in expanded line operations to reach suitable alternative layovers.

turnaround and out of service route modifications. All major service changes that require public hearings will be brought to the MSCs who will conduct public hearings then vote to approve, modify, or deny the service change proposals. Any significant temporary service change should be brought to the Council for their information but not approval. An October 2024 update to the Bylaws clarified that the Service Councils would also convene any required public hearings for the Title VI analyses of new rail service plans. See Table 6.1 to refer to the timeline for a major service change.

Each Regional Service Council is responsible for holding public hearings that relate to major service changes (as defined in the following Section 6.2 Title VI Equity Analysis) to Metro bus and rail lines that provide significant service within their region, consistent with State and Federal laws and with Metro policies pertaining to public hearings. Following receipt of public input, the Council is responsible for approving all major service changes that are to be implemented that modify, add or delete Metro bus routes within the Service Council's jurisdiction in conformance with Metro service standards, collective bargaining agreements and Metro policies. When a major service change program requires three or more Councils to hold public hearings, an additional hearing is held at a central location, normally at the Metro headquarters building, on an appropriate Saturday.

Table 7.1 *Major Service Change Timeline*

Key Activities	Required Lead Time (Months Prior to Implementation)
Initiate Planning Process	12
Develop Preliminary Recommendations	7-8
Impact Analysis for Proposed Changes	6-7
Title VI Equity Analysis on Major Service Change Proposals	5-7
Service Council Review and Input	6-7
Confer with Labor Relation and Union Representatives	6-7
Public Review and Input	5
Finalize Service Change Program	4-5
Program Approval	3-4
Develop New Service Schedules	2-4
Print Public Timetables and Operator Assignments	1-2
Fabricate Decals for Bus Blades	1-2
Take Ones/Rider Alerts on Buses	0.5-1

All route and major service changes that are approved by the Regional Service Councils will be brought to the Metro Board of Directors as an information item. Should the Metro Board decide to move a Service Council approved service change to an Action Item, the Service Council will be notified of this change, prior to the next Service Council monthly meeting. Table 6.1 provides the established service change timeline.

7.1 Service Change Programs

Service change programs are developed based on input generated by a wide variety of sources including rider, community, and employee input, service restructuring studies, coordination with major Metro capital projects such as new rail alignments or joint developments, requests from other local operators, and performance monitoring results such as load levels and on-time performance. The service change process includes public review of the proposals, a technical evaluation of ridership impact, and Title VI equity analysis.

In accordance with contractual agreements with the Sheet Metal Air, Rail and Transit Union (SMART)¹⁰, bi-annual service changes will be implemented each year in June and December. Metro service changes are conducted to modify service based on ridership and load factors, on-time performance, other performance monitoring results, rider and community input, and budget considerations. A service change process workflow is provided in Figure 6.2.

As part of the evaluation process, resource impacts to in-service hours and required vehicles are also tracked to ensure compliance with budget parameters. In summary, the purpose of an evaluation on proposed service changes is to:

- Define and evaluate the impact on customers;
- Determine whether a proposed major service change or fare increase will have disparate impact on minorities or a disproportionate burden on low-income individuals by performing a Title VI Equity Analysis;
- Consider alternatives if a disparate adverse impact to minorities or disproportionate burden on low-income individuals are identified;
- Develop appropriate mitigation measures if needed; and
- Conduct required public hearing for all major service changes (see definition in Section 6.2 Title VI Equity Analysis).

Changes to the rail system occur less frequently. They generally relate to the opening of a new line or adjustments to the frequency or hours of operation for existing service. Changes in rail and bus service follow the same planning and implementation process.

7.2 Title VI Equity Analysis

The framework for equity begins with Title VI of the Civil Rights Act of 1964 which protects minority communities from disparate and disproportionate negative impacts as a result of major transit service changes. Executive Order 12898 - Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations provides further protection of low-income communities from disparate and disproportionate negative impacts.

¹⁰ The United Transportation Union (UTU) merged with the Sheet Metal Workers Union in 2014 to form SMART.

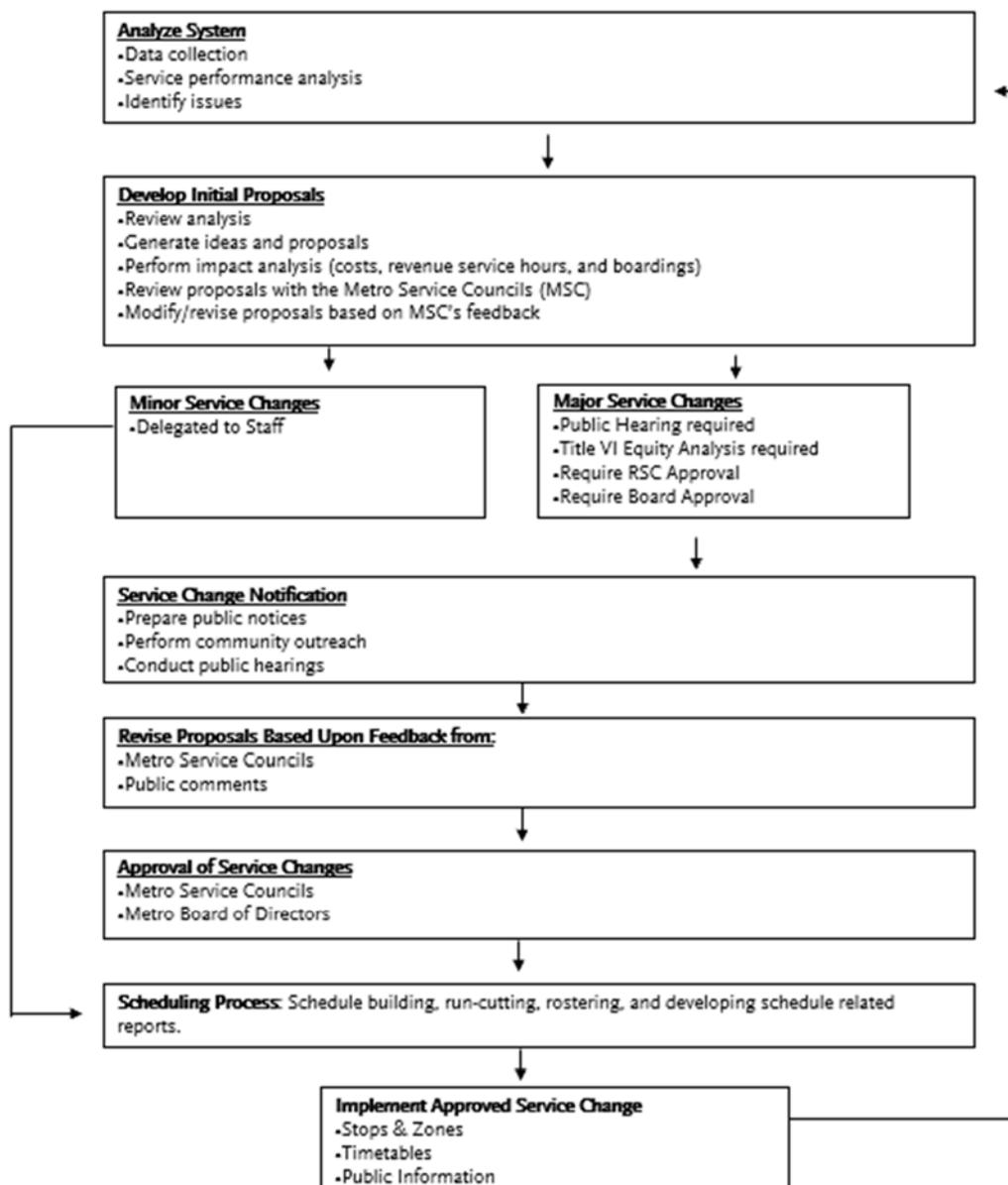


Figure 7.2 Service Change Process

Metro must ensure a Title VI Equity Analysis is performed on all major service change proposals and any fare change proposals to determine if these proposals will have a disparate adverse impact on minorities or disproportionate burden on low-income individuals prior to a public hearing. If it is determined that these proposed changes will have a disparate adverse impact on minorities or a disproportionate burden on low-income individuals, Metro will make a good-faith effort to mitigate or reduce the adverse impacts by looking for alternatives that can meet legitimate program goals with a lesser impact to protected groups.

In accordance with FTA's Title VI Circular 4702.1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients" (Effective October 1, 2012), Metro's Administrative Code was revised to incorporate FTA's requirements under Title VI. The Metro Board adopted the updated Administrative Code in January 2013. Based on this Circular, Metro is required to perform a Title VI Equity Analysis on all proposed major service changes or fare changes prior to implementation. The goal is to ensure there is no *disparate adverse impact* to minorities or *disproportionate burden* on low-income individuals created by a major service or fare change.

The following definitions and criteria were updated and adopted by the Board in September 2019. The Administrative Code now contains a reference to these definitions so that it need not be amended every time there is a need to modify the definitions:

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 customers.

- 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 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 5%

Disproportionate Burden Policy:

Disproportionate burden refers to a facially neutral policy or practice that disproportionately affects low-income populations more than those populations that are not low-income. A finding of disproportionate burden for major service and fare changes requires Metro to evaluate alternatives and mitigate burdens where practicable.

1. 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 5%.
2. 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 5%

Discretion of the Metro Board of Directors

A *major service change* or *fare increase* may be implemented even if the Title VI Equity Analysis determines a *disparate adverse impact* to minorities was created by the change. However, the Metro Board of Directors must first ensure these changes meet two tests:

- There is a substantial legitimate justification for adopting the proposed major service change or fare increase, meaning the selected service change or fare increase meets a goal that is integral to the mission of Metro; and
- The selected alternative would have a less severe adverse effect on Title VI protected populations than other alternatives that were studied.

Major Service Change

Major service changes are defined in Metro's Administrative Code in Chapter 2-50 Public Hearings Subsection 2-50-010 as any service change that meets 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.
6. 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.
7. 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.

Fare Changes

Any fare change requires an equity evaluation consistent with the following guidance:

1. A Fare Equity Analysis shall be prepared for any fare change (increase or decrease). This includes but is not limited to permanent fare changes, temporary changes, promotional fare changes, and pilot fare programs. The analysis will evaluate the effects of fare changes on Title VI protected populations and low-income populations. The analysis will be done for fares not available to the general public such as special

discount programs for students, groups or employers.

2. If fare changes are planned due to the opening of a new fixed guideway project, an equity analysis shall be completed six months prior to opening of the service.
3. Each Title VI Fare Equity Analysis shall be completed and presented for consideration of the Board of Directors in advance of the approval of the proposed fare or fare media change by the Board of Directors. The Equity Analysis will then be forwarded to the FTA with a record of action taken by the Board.
4. A Title VI analysis is not required when:
 - a) A change is instituted that provides free fares for all customers;
 - b) Temporary fare reductions are provided to mitigate for other actions taken by Metro;
 - c) Promotional fare reductions are less than six months in duration. An equity analysis must be conducted prior to making any temporary fare change into a permanent part of the fare system.

7.3 Metro's Equity Platform

The NextGen Bus Study aimed to go above and beyond Title VI requirements to analyze disparate impacts and disproportionate burden on minority and low-income populations to identify communities with the greatest mobility needs. To do this, Metro's Equity Platform was integrated into the NextGen Bus Study planning and public engagement process. In 2018, Metro's Board adopted the [Equity Platform](#), a framework that guides how the agency works to address inequities and create more equitable access to opportunity.

The NextGen process started with analysis of Equity Focus Communities (EFCs) Metro's community designation that defines areas where transportation needs are greatest. EFCs consider where there are higher concentrations of resident and household demographics associated with mobility barriers (low-income households earning less than \$60,000 per year; Black, Indigenous, or People of Color (BIPOC) populations; and households that do not have a car). Additionally, the NextGen sought to capture other metrics in a Transit Equity Index to identify transit propensity to ensure investment in transit targeted area populations with the most need to use transit. Through market research, surveys, and public input, other groups determined to be most reliant on transit include non-English speaking new immigrants, youth and seniors, persons without access to an automobile either by choice or necessity, persons with disabilities, and women, who tend to make more transit trips than men. Data available for these groups was used in the calculation of the Transit Equity Index.

The Four Pillars of the Equity Platform were integrated into the NextGen Bus Study as follows

- I. **Define and Measure** – Use EFCs as a baseline for identifying communities with the greatest needs, and supplement those with market research to identify the segments of population and trips with the highest propensity for transit use. Evaluate bus network changes based on customer-focused performance metrics established within

this Transit Service Policy document with particular focus on Equity Focus Communities with the greatest mobility needs as identified above.

- II. **Listen & Learn** –The technical work of the NextGen Bus Study identified important information about Metro’s current and potential customers. This data was validated by a robust countywide public engagement effort that included engaging customers on board buses, at outreach sessions at community events, stakeholder briefings, interactive public workshops, digital engagement, and print advertising. Comments received were incorporated into the systemwide service design as well as individual route changes.
- III. **Focus & Deliver** – Service design concepts established within this Transit Service Policy document are intended to address the recurring themes identified from the public outreach and market research, including faster and more frequent service, better reliability and accessibility to key destinations, better connectivity particularly with the municipal operators, and improved perception of safety on board buses and at bus stops. These concepts were used to redesign the routes and schedules for the NextGen Bus Plan.

As part of the NextGen Bus Study process, a Transit Propensity Index score was developed and assigned to every Census Tract in Los Angeles County. This index score considers the various market segments likelihood to use transit, the transit orientation of the environment being served, and the travel demand within the area. Areas with high scores should be prioritized for high quality transit service.

Lastly, other customer experience enhancements such as improved safety, accurate real time arrival information, cleanliness, and improved first/last mile service are critical to attracting customers to use transit.

The Board-adopted Transit Service Policy will be updated to reflect the Regional Service Concept as adopted by the Board, including the goals and objectives of the bus network, measures of success, route and network design concepts based on public input and data analysis, and the framework referenced for balancing tradeoffs in consideration of Metro’s Equity Platform.

- IV. **Train & Grow** –Service Planning has adopted new tools to analyze the potential impacts of service changes on EFCs. Ridership in EFCs is tracked on a monthly basis.

7.4 Public Outreach

Prior to a public hearing, public outreach is conducted so that the greatest number of customers may respond to the changes at either a public hearing or by submitting written comments at a hearing, or via email, mail, or fax. The distribution of information will include line number, line name, route change information, and/or fare change proposals. Other public outreach occurs at key transportation centers, bus stops, and bus and rail stations 30 days prior to the public hearing date. These efforts are made to reach and engage customers who may not have time to attend a public hearing and to inform them of alternative communication methods available to file public comments. Public participation in the public hearing process is an important step in assisting staff and Metro Service Councils in

developing and approving final service change proposals. Table 6.2 provides a timeline for public notification activities.

Table 7.2 *Timeline for Public Notification Activities*

Activity	Months Prior to Service Change
Service Planning staff reviews preliminary proposals.	7
Metro Service Councils set public hearing dates. Hearing notices published in local newspapers. Send LEP and minority communities written notification to elected officials, other operators and key stakeholder groups. Confer with Labor Relations and Union representatives.	5-6
Service Planning staff provides information on proposed changes to the Metro Bus Operators Subcommittee and at quarterly meetings held with the region’s municipal and local operators.	3
Communication Department posts information proposed changes on Metro’s website.	5
Operations staff distributes meeting notices on board vehicles. Public outreach at key transportation centers, bus stops, and on-board customer interface occurs as well.	Minimum one month prior to public hearings
Metro Service Councils conduct public hearings.	4
Metro Service Councils approve final service change program.	3
Metro Board receives the Service Councils’ approved service change program as a Receive and File item.	2
Communication Department prepares press releases on final program and program brochures are distributed on board Metro vehicles and other outlets.	1

These procedures are in accordance with Metro’s Administrative Code in Chapter 2-50 Public Hearings Subsection 2-50-025:

- A. Any public hearing required by Section 2-20-020 shall be conducted as set forth in this section.
- B. Notice of the hearing shall be published in at least one English language and Spanish language newspaper of general circulation and at least thirty (30) days prior to the date of the hearing. Notice at least thirty (30) days prior to the date of the hearing shall also be published in the neighborhood and foreign language and ethnic newspapers as appropriate to provide notice to the members of the public most likely to be impacted by the proposed action.
- C. Notice of the public hearing shall also be announced by brochures in English, Spanish and other appropriate languages on transit vehicles serving the areas to be impacted and at customer service centers.
- D. To ensure that the views and comments expressed by the public are taken into consideration, MTA staff shall prepare a written response to the issues raised at the public hearing. That response should also include a general assessment of the social, economic and environmental impacts of the proposed change, including any impact on energy conservation.

- E. The public hearing related to a recommendation to increase transit fares charged the public shall be held before the Board of Directors and any action taken to increase the fares charged the general public must be approved by a two-thirds vote of the members of the Board of Directors. The Board of Directors may delegate to another body or a hearing officer appointed by the Chief Executive Officer the authority to hold the public hearing related to a change in transit service.

7.5 Public Hearing Process

Once Metro Service Planning Staff develops a Service Change Program, the Metro Service Councils are asked to set a date, time and place for their public hearings. During the period between publication of the hearing notices and public hearings, each Service Council is provided a detailed presentation on service change proposals and given an opportunity to discuss the changes that will be the subject of public comment. After each hearing, each Service Council will meet to consider and approve, modify, or deny all proposed service changes. These actions are then summarized and presented in an informational report to the Metro Board of Directors.

Under Metro's Service Council bylaws, all service changes must be reviewed and approved by their respective Service Council(s). Public hearings are usually held at the same location where the Service Councils hold their meetings but may be held at other locations so as to be more accessible to those customers who would be affected by the proposed service changes. When a major service change program requiring the associated Councils to hold public hearings affects three or more service regions, thus, an additional hearing will be held at a central location, normally at the Metro headquarters building, on an appropriate Saturday. In accordance with Metro's Administrative Code in Chapter 2-50 Public Hearings Subsection 2-50-020, Metro will hold a public hearing on all major service change or fare change proposals that are subject to a Title VI Equity Analysis. Major service change proposals are subject to Metro Regional Service Council and Metro Board approval, while fare change proposals are under the purview of the Metro Board.

7.6 Implementing Minor Changes on an Interim Basis

Minor service changes are generally route modifications that can be accommodated without impacting the vehicle or operator requirements of the service. Minor service changes do not require a public hearing but are shared with the relevant Service Councils as a courtesy and can be implemented at the discretion of staff.

APPENDICES

APPENDIX A: Metro Line Identification

The purpose of establishing transit service line identification standards is to create a simple way for customers to identify, locate, and reference Metro services, and thereby make the services easier for customers to use.

The line identification standards shall be adhered to when identifying Metro Bus and Metro Rail lines by name. The standards shall be implemented across all internal and external mediums including but not limited to, rail station signs, bus stop signs, bus station signs, vehicle head signs, vehicle destination signs, timetables, HASTUS and ATMS¹¹. The descriptions and chart below help explain the standards, and how and when they should be implemented.

General Standards

- Transit lines will be identified using a combination of line number, destinations (both terminals) and the corridor(s) the line travels along. Metro Rail and Metro BRT service which previously used the established operational names (e.g., Metro B Line, Metro D Line, Metro G Line) are being transitioned to a letter-based designation. To ensure consistent usage of transitional naming for Rail and BRT lines, updates to customer information should be referred to the Communications Department.
- Acceptable destination names include a city, community, major landmark, transit center or rail station. Street intersections are no longer to be used as a destination unless the intersection is required to identify short-line service.
- The destination points will be listed in a West to East or North to South order, consistent with how the line would be read on a map. Destinations on head signs, destination signs, timetables, and physical signage must always be consistent.
- Lines that have Downtown LA as one of the line's end points will list its first, as Downtown LA.
- The name of the line will also list at least one major corridor on which it travels.
- Name abbreviations, street extensions and other topics will be dictated by the Metro Signage Guidelines.

Printed Materials and Electronic Customer Information

- The line will be presented using the full name, listing both the destinations and major corridor(s).
- Printed materials include, but are not limited to, timetables, service change announcements, brochures, system maps, and service reports.

¹¹ HASTUS (Horaires et Assignements pour Systèmes de Transport Urban et Semi-Urban) refers to the software used to create schedules. ATMS (Advanced Transportation Management System)

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- Electronic customer information includes the line information presented on metro.net and underlying electronic databases such as HASTUS and ATMS.
- Trip Planners and mobile applications providing real-time data to riders will present the line name similarly to what will be shown on the vehicle head sign and bus stop sign, so customers can easily locate the appropriate line at the stop.

Rail Station Signage

- The line will be presented using the line letter designation, and destination point that the vehicle is traveling to in each direction.

Bus Stop Signage

- The line will be presented using the line number, service brand, color and destination point that the vehicle is traveling to in each direction.
- The main corridor(s) will also be listed as well as special service qualifiers including, but not limited to, rush-hour service and weekday-only service.
- Short-line trip destinations will not be shown on bus stop signs.

Bus Route Numbering Convention

Bus line numbers are assigned to indicate the type of service provided and where the line travels.

Line Numbers	Type of Service
1-99	Travel into downtown Los Angeles, referencing general corridors consecutively in a counterclockwise rotation
100s	Operate from east to west and travel outside of downtown Los Angeles
200s	Operate from north to south and travel outside of downtown Los Angeles
300s	Metro Local buses with limited stop service
400s	Arterial express bus services to/from downtown Los Angeles
500s	Freeway express bus services outside of downtown Los Angeles
600s	Operate local shuttle bus service
700s	Metro Rapid bus service
800s	Bus bridges for the rail network
900s	Metro Liner bus service

Vehicle Head Signs

- Head signs will list the destination in which the vehicle is traveling towards in one frame.
- Head signs on Rail and BRT vehicles will list the line letter designation in one frame.
- For short-line trips, the line number and destination shown will be the destination of that trip and not of the entire line.
- When the line is not in service, the sign will read “Not in Service” and display the route number per Operations Notice #09-18.

- Name abbreviations, street extensions and other topics will be dictated by the Metro Signage Guidelines.

Automatic Voice Announcements

- External On-Board Announcements:
 - The line will be identified in automatic external voice announcements using the line number and destination point that the vehicle is traveling to in each direction.
 - For short-line trips, the destination noted will be the destination of that trip and not of the entire line.
- Internal On-Board Announcements:
 - When the automatic voice announcement system identifies a stop, the end destination of that line will follow.
 - The stops and stations announced onboard should be consistent with names used on maps, timetables and other printed materials.

Assigning Line Identifiers

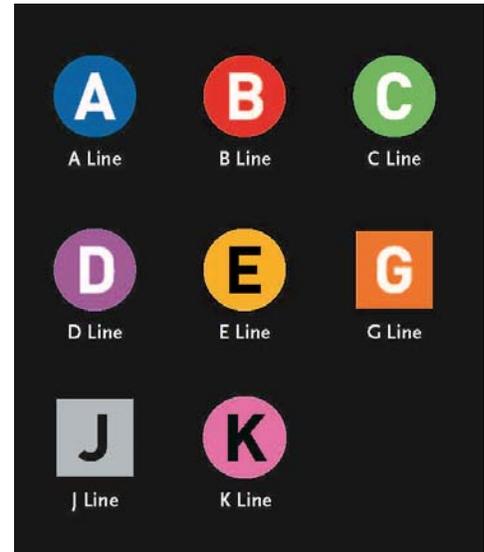
It is expected that the standards will be easily applied to the majority of lines; however, it is also understood that exceptions will have to be made for some lines due to unfamiliar end points or corridors, or where temporary solutions are necessary due to construction, temporary service changes, or pilot program deployment. In these limited cases, Service Planning staff and Communications must be in consensus regarding these changes before deciding to deviate from the standards. The Stop and Zones Department may also deploy temporary signage at bus and rail facilities as needed when emergency closures or other service changes impact scheduled service. For detailed guidance on using Metro signage standards, Metro Signage and Environmental Graphic Design Standards documents may be obtained from the Communications Department.

Metro's Rail Line Identification, Naming, and Color Conventions

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Rail and BRT lines previously denoted by a color transitioned to a letter/color combination beginning in November 2019. The letters assigned to each rail line generally conform to the order in which each line went into operation. The current designations are depicted in the adjacent chart.

The Regional Connector Project service plan resulted in the L designation being phased out and the relevant sections of the L Line becoming the A Line to Azuza or the E Line to East LA. The Crenshaw Line is known as the K Line with a pink color.



**APPENDIX B: Los Angeles County Local Fixed and Demand Response Route
Transit Operators**

	Municipal	Local Return	General Dial a Ride	Special Purpose Dial a Ride
Agoura Hills		X		X
Alhambra		X	X	
Antelope Valley Transit Authority (AVTA) serves: <ul style="list-style-type: none"> • Palmdale • Lancaster • Portions of Unincorporated Los Angeles County 	X	X		
Arcadia				X
Artesia		X		
Avalon		X		
Azusa		X		
Baldwin Park		X		
Beach Cities Transit serves: <ul style="list-style-type: none"> • Redondo Beach • Manhattan Beach • Hermosa Beach • El Segundo 	X	X		
Bell		X		
Bell Gardens		X		
Bellflower		X		
Beverly Hills		X		
Burbank		X		
Calabasas		X		
Carson		X		
Cerritos		X		
Commerce	X	X		
Compton		X		
Covina		X		
Cudahy		X		
Culver City	X	X		
Diamond Bar				X
Downey		X		
Duarte		X		
El Monte		X		
El Segundo		X		
Foothill Transit serves member cities of <ul style="list-style-type: none"> • Arcadia • Azusa • Baldwin Park • Bradbury 	X	X		

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	Municipal	Local Return	General Dial a Ride	Special Purpose Dial a Ride
Member cities served by Foothill Transit continued				
<ul style="list-style-type: none"> • Claremont • Covina • Diamond Bar • Duarte • Glendora • Industry • Irwindale • La Puente • La Verne • Monrovia • Pasadena • Pomona • San Dimas • South El Monte • Temple City • Walnut • West Covina 				
Gardena	X	X		
Glendale		X		
Glendora		X		
Hawaiian Gardens		X	X	
Hawthorne		X		
Hermosa Beach		X		
Huntington Park		X		
Inglewood		X		
La Cañada Flintridge		X	X	X
La Habra Heights			X	X
La Mirada				X
La Puente		X	X	
La Verne			X	
Lakewood			X	
Lawndale		X		
Lomita				X
Long Beach	X	X		
Los Angeles	X	X		
Los Angeles County		X		
Lynwood		X		
Manhattan Beach		X		
Malibu		X		
Maywood		X		
Monrovia		X		
Montebello	X	X		

2025 Metro Transit Service Policies & Standards

	Municipal	Local Return	General Dial a Ride	Special Purpose Dial a Ride
Monterey Park		X		
Norwalk	X	X		
Palos Verdes Estates		X		
Paramount		X		
Pasadena		X		
Pico Rivera		X		
Pomona		X		
Redondo Beach		X		
Rolling Hills Estates		X		
Rosemead		X		
San Dimas			X	
San Fernando		X		
San Gabriel			X	
San Marino				X
Santa Clarita Valley Transit (SCVT) serves <ul style="list-style-type: none"> • Santa Clarita • Portions of Unincorporated Los Angeles County 	X	X		
Santa Fe Springs		X		
Santa Monica	X	X		
Sierra Madre		X		
Signal Hill		X		X
South El Monte			X	
South Gate		X		
South Pasadena		X		X
Temple City			X	X
Torrance	X	X		
Walnut				X
West Covina		X		
West Hollywood		X		
Westlake Village		X		
Whittier		X		
Total	13	69		

Many of the Local Return systems listed above do not provide fixed route service but instead provide Demand Response services: Hawthorne, Malibu, and Manhattan Beach are examples.

ATTACHMENT D

Introduction

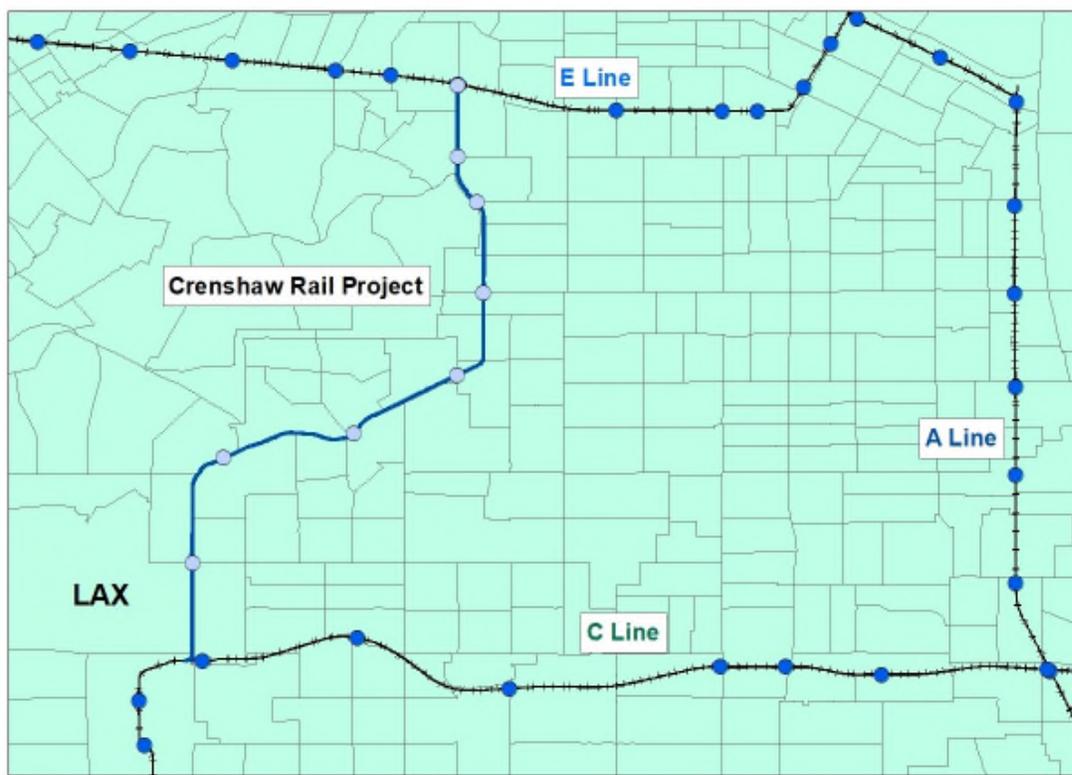
Section 601 of Title VI of the Civil Rights Act of 1964 states “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

LA Metro, as a recipient of federal funding, is required to ensure its programs and activities are conducted consistent with the intent of Title VI. The Crenshaw light rail project is a new rail alignment involving federal funding that is expected to begin operation in 2022. Consistent with Federal Transit Administration Title VI guidelines and Metro’s Title VI Plan, a Service and Fare Equity (SAFE) Analysis of the impacts of this new service on minority populations is required.

Background

The Crenshaw Rail Project is an 8.5-mile extension of C Line (Green) light rail from Aviation/Imperial to the Exposition Line at Exposition/Crenshaw (Figure 1), including nine new stations. Included is a station at the Airport Metro Connector that will provide a direct connector to the new LAX airport people mover system. The Crenshaw line will be known as the K Line and will be integrated with C Line (Green) operations consistent with the Metro Board adopted Operating Plan. This new line links with three existing rail lines (A-Line, C-Line, E-Line).

Figure 1 – Crenshaw Rail Line Project



Due to the construction of the Airport Metro Connector station, the Crenshaw rail service will be opened in three stages:

- 1) 2022: New K Line rail service would begin on the segment between Westchester Veteran and Expo Crenshaw stations, serving five intermediate stations, with a bus bridge service between Westchester/Veterans station and Aviation/LAX station on the C Line (Green).

K Line service would operate up to every 6-minute in peak periods weekdays, 12-minute off peak service weekdays and weekends, and 20-minute evening service, consistent with the E Line (Expo) service that it will connect with, as well as that operated across most of the Metro light rail network.

The C Line Green service would continue to operate existing service levels between Norwalk and Redondo Beach stations.

- 2) Late 2023: Full K Line service, integrated with the C Line (Green) service between Norwalk C Line (Green) station and Expo Crenshaw K Line station. Aviation Century station would be served and bus bridge service would no longer be required. At this time, C Line (Green) service would be modified to operate between Willowbrook Rosa Parks C Line (Green) station to Redondo Beach C Line (Green) Station.

K Line service in this phase overlaps the C Line (Green) service between Willowbrook Rosa Parks and Aviation LAX station, combined to provide at least doubling service frequencies in this segment:

- Up to 3-minute combined peak weekday service (currently up to 6 minute)
- 6-minute weekday and weekend off peak service (currently 15-minute)
- 10-minute evening service (currently 20-minute) frequencies available in this segment.

- 3) Late 2024: Same service patterns as for Phase 2 above with the addition of the Airport Metro Connector station.

The fares for the new K Line light rail service will be the same as for other Metro rail and bus services.

There are no other bus service changes being made as a result of the new rail services above.

Analysis: Metro's Title VI Policies

Major Service Change Policy

Metro's Major Service Change Policy requires this Title VI Analysis be completed six months prior to the opening of the new fixed guideway project (e.g. Crenshaw light rail corridor). It is required regardless of whether or not the amount of service being changed meets the requirements in the other subsections of the policy.

Disparate Impact

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 riders. For fare changes, a disparate impact will be deemed to have occurred **if the absolute difference between the percentage of minority riders adversely affected and the overall percentage of minority riders is at least five percent** per Metro's Title VI Program which was updated and approved by Metro's Board in October 2019.

Disproportionate Burden

Disproportionate burden refers to a neutral policy or practice that disproportionately affects low-income riders more than non-low-income riders. Metro defines low-income riders at **\$41,500**, which represents the median income of a three-person household in Los Angeles County. A finding of disproportionate burden for major service and fare changes requires Metro to evaluate alternatives and mitigate burdens where practicable. For fare 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** per Metro's Title VI Program which was updated and approved by Metro's Board in October 2019.

Disparate Impact Analysis Methodology

In order to assess whether the change will have a disparate impact on minority riders, this report evaluates the ethnicity demographic data of the community this new rail alignment will serve. The data is then compared to the ethnicity demographic data of the Metro Service Area. If the absolute difference between the minority percentage along the alternatives and the Metro Service Area percentage is at least five percent, an impact is deemed to have occurred.

Service and Fare Impacts

When the Crenshaw (K Line) light rail service comes online beginning in 2022, it will add approximately 72,000 annual rail revenue hours to existing transit service to corridor. No existing light rail segment will see less service. As outlined above, the segment between Willowbrook Rosa Parks and Aviation LAX stations (serving five intermediate stations) will see double the existing peak service weekdays (up to 3 min. compared to 6 minute) and evening service (from 20-minute to 10-minute) and more than doubling off peak weekday and weekend service (from 15-minute to 6-minute), through the combined C and K Line service levels. The only impact is those passengers boarding at C Line (Green) stations east of Willowbrook Rosa Parks Station travelling to stations west of Aviation/LAX station will need to change trains there.

The fares for the new K Line light rail service will be the same as for other Metro rail and bus services and integrated with the fares for these other services. There are no other bus service changes being made because of the new rail services above.

Minority and Low-Income Populations Served by New K Line

As required under Title VI, Metro has reviewed the minority and low-income populations that will be served by the new 8.5-mile, 9 station Crenshaw (K Line) rail service based on being within 0.5 miles of the alignment. The relevant data is shown in Table 1 below. There is no ridership data to analyze for demographics as the line is not yet in operation.

Table 1

	Population	Minority Population	Minority Percent	Households	Low Income Households	Low Income Household Percent
Crenshaw Rail Project	177,720	159,028	89.5%	68,026	30,375	44.7%
Metro Service Area	9,417,605	6,634,742	70.5%	3,176,713	1,089,941	34.3%
Difference Comparison			19.0%			10.3%

Note: The Metro Service Area information is from the October 2019 Title VI Update Report to the Metro Board.

The minority population that will be served by the K Line (see Figure 2, 0.5-mile catchment) comprise 89.5 percent of the overall population the new line will serve is 19 percent higher than the 70.5 percent average for Metro’s overall service area. This constitutes a disparate impact to minority population under Title VI. However, since the project is a benefit to both the corridor and the minority population the new line will serve, by adding a new rail service and not reducing associated bus services, the disparate impact is positive for the minority population under Title VI and does not require any review of alternative options for mitigation.

The Low-income households that will be served by the K Line (see Figure 3, 0.5-mile catchment) comprise 44.7 percent of the households. This is 10.3 percent higher than the Metro Service Area average of 34.3% for low-income households. Consequently, this would normally represent a disproportionate burden for the low-income households the new line will serve. However, since the project is a benefit to both the corridor and the low-income households the line will serve, by adding a new rail service and not reducing associated bus services, the disproportionate burden is positive for the low-income population under Title VI and does not require any review of alternative options for mitigation.

Outreach

Throughout the development and construction of the Crenshaw rail project, Metro has provided a comprehensive bilingual (English/Spanish) outreach and communications program. This includes door-to-door outreach, community construction update meetings, key stakeholder group briefings and presentations, distribution of construction notices, e-notifications, and press releases. A fact sheet inclusive of the project’s hotline number, website and email address has also been widely distributed and posted on the project website. The Metro Construction Relations team continues to implement this robust outreach and communications program to notify the neighboring communities, stakeholders and the public of construction progress and changes to the project’s schedule despite the COVID-19 pandemic.

In early 2019, the public outreach plan was further enhanced by:

- Briefings between Metro CEO and key community leaders that included updates on construction milestones, challenges and contractor’s changes to the anticipated project completion date. Key community leaders include Community Leadership Council members, local business owners as well as faith-based leadership.

- Providing updates to key community leaders via a letter from Metro CEO;
- Weekly e-notifications to the over six thousand project stakeholder list;
- Phone calls to stakeholders;
- Bi-monthly virtual online community construction progress meetings with phone option to participate;
- Ongoing monthly briefings to council staff, neighborhood councils, chambers, and area community-based organizations.

Throughout the rollout of these enhanced communications, Metro has been transparent in its communications with the public about delays in completing the project. The agency has made it clear that safety is its number one priority. Metro will not accept the project until all testing has been satisfactorily completed to assure a safe and reliable system for the public. The community have appreciated Metro’s transparency and continued communications.

Outreach to local small businesses has also been a key step in project outreach given the construction impacts in the corridor. Metro has outreached through one-on-one phone calls and emails to inform the small businesses of the benefits offered by the Eat Shop Play mitigation program offered to Metro. Over 80 small businesses have registered as participants of this program. As participants, they have been provided free advertisement in English and Spanish either on local print/virtual ads, Metro station digital kiosks, bus cards, banners or spotlighted on e-newsletters and/or through various social media platforms. During COVID-19 restrictions, the Eat Shop Play program utilized weekly emails to the entire Eat Shop Play distribution (over 18,000 addresses). This email campaign focused on businesses that had online offerings, or restaurants that offer takeout or delivery options.

The Crenshaw service plan was formally adopted by Metro Board at their December 2018 meeting. This was preceded by public workshops and Metro Service Council meetings held in the community in September 2018 as follows:

Community

- Tuesday, September 25 - Crenshaw Community Leadership Council (CLC)
- Monday, September 17 - Public Meeting (Gateway Cities Council of Governments)
- Thursday, September 20 - Public Meeting (The Proud Bird - 11022 Aviation Blvd)
- Wednesday, September 26 – Public Meeting (Baldwin Hills Crenshaw Mall)

Service Councils

- Wednesday, September 12 - Westside Central Service
- Thursday September 13 – Gateway Cities Service Council
- Friday, September 14 - South Bay Service Council

Both South Bay Cities and Gateway Cities Councils of Government received briefings at this time in 2018.

As a completion date becomes clearer for construction, and Metro begins pre-revenue service testing for the opening of the first segment between Westchester/Veterans and Expo/Crenshaw, outreach will focus on informing the community of this new service as well as the expected timeline for the full

project completion to connect to the C Line Green alignment once the platform facing at AMC Station is completed and run through train service there can be safely operated.

Conclusion

The Crenshaw Rail project will create the new K Line rail service, providing a benefit to minority population and low-income households that will be served by this new rail corridor. As a result, the disparate impacts and disproportionate burdens under Title VI are of a positive nature and do not require mitigation. The project will provide new high quality mobility options for the community it will service which is consistent with the overall goal of improving public transit service through expanding rail service coverage across the LA region. Minority and low-income riders will be beneficiaries of the project.

Metro followed requirements of FTA Circular 4702.1B and met the legal test for disparate impact as follows:

(1) Metro has a substantial legitimate justification for the proposed service change as it works to expand access to high quality rail service and facilities across the Metro service area; and (2) Metro has no alternatives that would have a less disparate impact on minority riders but would still accomplish the transit provider's legitimate program goals with the opening of Crenshaw rail. Staff is therefore requesting the Metro Board adopt this analysis in support of the impending introduction of K Line rail service.

Figure 2 – Crenshaw Rail Line – Minority Population

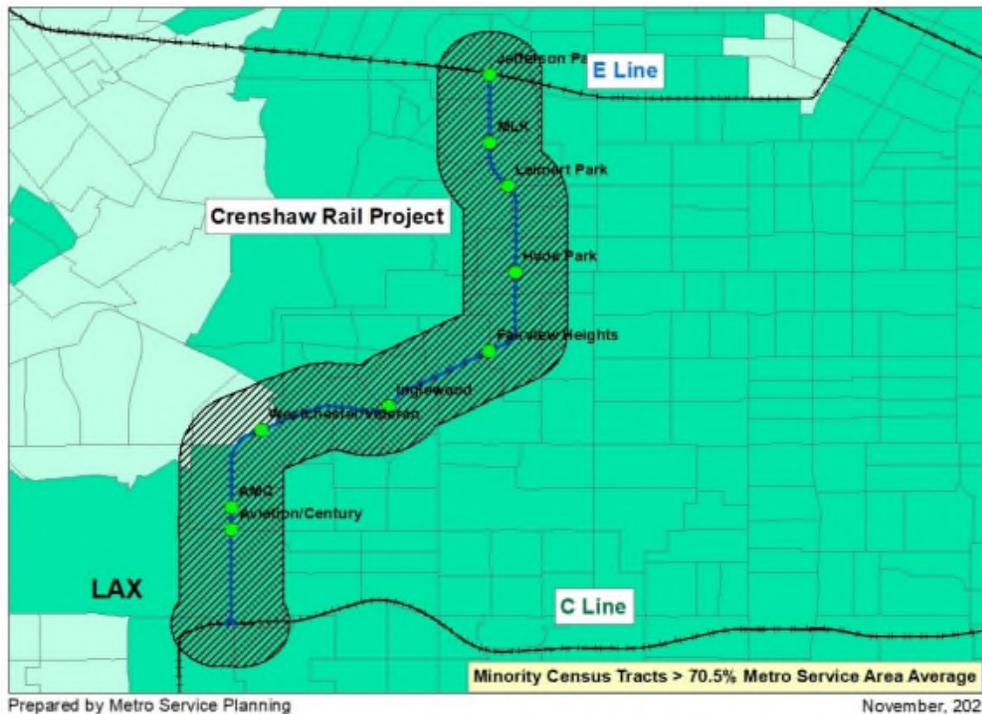
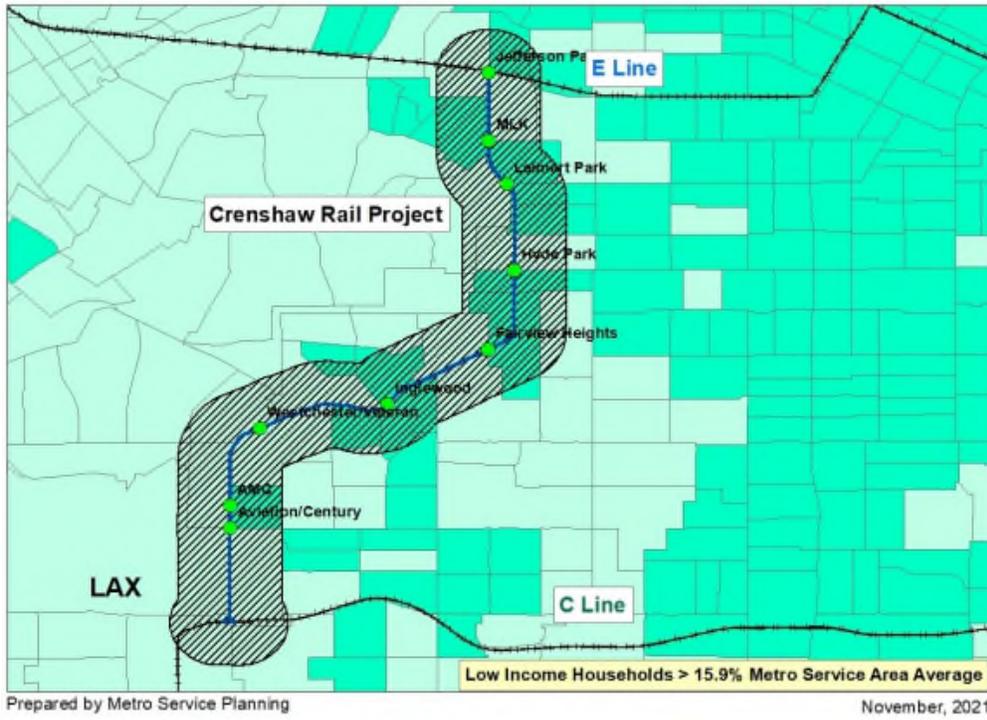


Figure 3 – Crenshaw Rail Line – Low Income Population



ATTACHMENT E

LA Metro Regional Connector Rail Project Title VI Service Equity Analysis



Prepared by Los Angeles Metro Operations Department, December 2021

Agency Recipient ID 5566

Agency Contact: Aida Berduo Berry, Senior Manager, Civil Rights Programs (Title VI),

Office of Civil Rights, Racial Equity & Inclusion

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Introduction

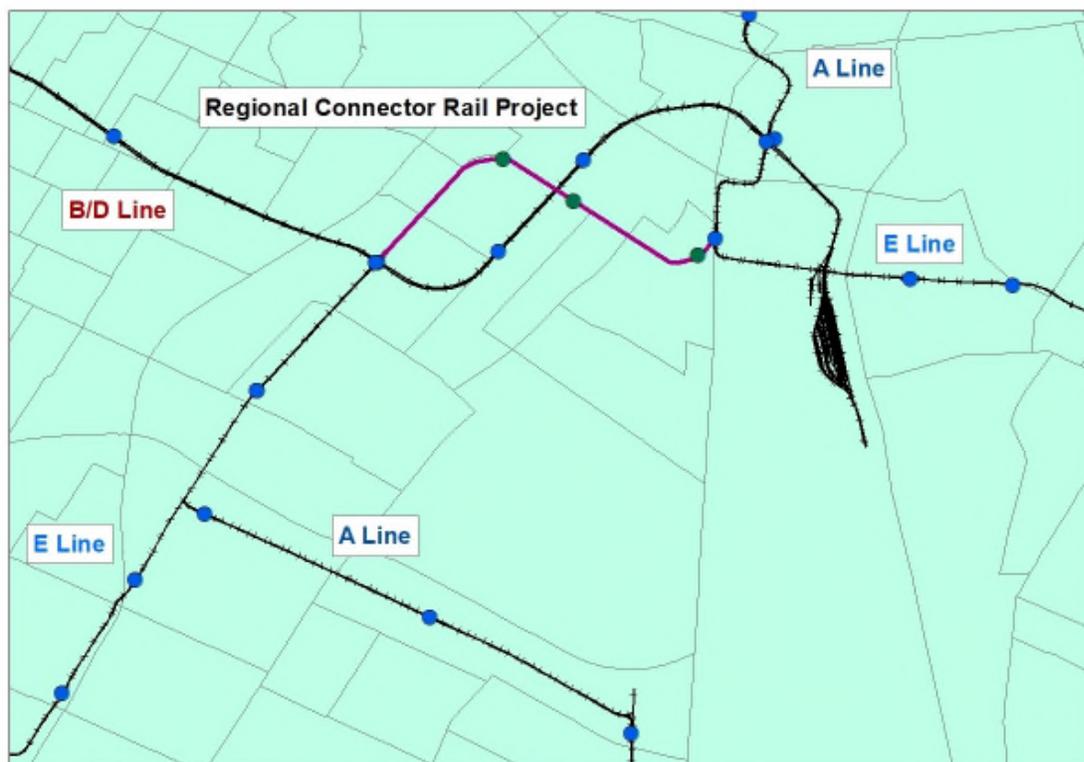
Section 601 of Title VI of the Civil Rights Act of 1964 states “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

LA Metro, as a recipient of federal funding, is required to ensure its programs and activities are conducted consistent with the intent of Title VI. The Regional Connector light rail project is a new rail alignment involving federal funding that is expected to begin operation in late 2022. Consistent with Federal Transit Administration Title VI guidelines and Metro’s Title VI Plan, a Service and Fare Equity (SAFE) Analysis of the impacts of this new service on minority populations is required.

Background

The Regional Connector Rail Project is a 1.9-mile underground light-rail system connecting the Metro L Line (Gold) to the 7th Street/Metro Center Station. Once operations commence, A Line (Blue), E Line (Expo) and L Line (Gold) operations will be reconfigured from a 3-line operation to a 2-line regional operation – A Line (Long Beach – Azusa) and E Line (Santa Monica – Eastside) with three new underground stations to be added in downtown Los Angeles: Little Tokyo/Arts District (1st St/Central Av), Historic Broadway (2nd St/Broadway), and Grand Av Arts/Bunker Hill (2nd Pl/Hope St). (See Figure 1)

Figure 1 – Regional Connector Rail Project



Analysis

Metro's Title VI Policies

Major Service Change Policy:

Metro's Major Service Change Policy requires this Title VI Analysis be completed six months prior to the opening of the new fixed guideway project (e.g., Regional Connector light rail corridor). It is required regardless of whether the amount of service being changed meets the requirements in the other subsections of the policy.

Disparate Impact

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 based on race, color, or national origin. This policy defines the threshold Metro will utilize when analyzing the impacts to minority riders. For fare changes, a disparate impact will be deemed to have occurred **if the absolute difference between the percentage of minority riders adversely affected and the overall percentage of minority riders is at least five percent** per Metro's Title VI Program which was updated and approved by Metro's Board in October 2019.

Disproportionate Burden

Disproportionate burden refers to a neutral policy or practice that disproportionately affects low-income riders more than non-low-income riders. Metro defines low-income riders at **\$41,500**, which represents the median income of a three-person household in Los Angeles County. A finding of disproportionate burden for major service and fare changes requires Metro to evaluate alternatives and mitigate burdens where practicable. For fare 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** per Metro's Title VI Program which was updated and approved by Metro's Board in October 2019.

Disparate Impact Analysis Methodology

To assess whether the change will have a disparate impact on minority riders, this report evaluates the ethnicity demographic data of the community this new rail alignment will serve. The data is then compared to the ethnicity demographic data of the Metro Service Area. If the absolute difference between the minority percentage along the alternatives and the Metro Service Area percentage is at least five percent, an impact is deemed to have occurred.

Service and Fare Impacts:

When the Regional Connector (A and E Line) light rail service comes online beginning in 2022, it will add 72,000 annual rail revenue hours to existing transit service to corridor. No existing light rail segment will see less service. As outlined above, the Regional Connector will reconfigure A Line

Line (Blue), E Line (Expo) and L Line (Gold) operations from a 3-line operation to a 2-line regional operation – A Line (Long Beach – Azusa) and E Line (Santa Monica – Eastside) with three new stations. Peak period service will be 6-minutes during peak, 12-minutes in the base and 12 – 20 minutes on weekends on each Line. These are all consistent with pre-COVID rail service levels throughout the Metro rail system. This will result in 3-minute combined peak frequency, 6-minute off peak weekday and weekends, with 10-minute evening combined frequency on the new Regional Connector rail link.

The fares for the newly configured A and E Line light rail service will be the same as for other Metro rail and bus services and integrated with the fares for these other services. There are no other bus service changes being made because of the new rail services above.

Minority and Low-Income Populations Served by Regional Connector:

As required under Title VI, Metro has reviewed the minority and low-income populations that will be served by the new 1.9-mile, 3 station Regional Connector (A and E Line) rail service based on being within 0.5 miles of the alignment. The relevant data is shown in Table 1 below. There is no ridership data to analyze for demographics as the line is not yet in operation.

Table 1

	Population	Minority Population	Minority Percent	Households	Low Income Households	Low Income Household Percent
Regional Connector Rail Project	88,478	64,918	80.7%	37,922	20,375	53.7%
Metro Service Area	9,417,605	6,634,742	70.5%	3,176,713	1,089,941	34.3%
Difference Comparison			10.2%			19.4%

Note: The Metro Service Area information is from the October 2019 Title VI Update Report to the Metro Board.

The minority population that will be served by the new Regional Connector Stations (see Figure 2, 0.5-mile catchment) comprise 80.7 percent of the overall population the new line will serve is 10.2 percent higher than the 70.5 percent average for Metro’s overall service area. This constitutes a disparate impact to minority population under Title VI. However, since the project is a benefit to both the corridor and the minority population the new line will serve, by adding a new rail service and not reducing associated bus services, the disparate impact is positive for the minority population under Title VI and does not require any review of alternative options for mitigation. The new services will also avoid the need for many riders to change trains to the heavy rail network to cross downtown LA to continue their journeys.

The Low-income households that will be served by the new Regional Connector Stations (see Figure 3, 0.5-mile catchment) comprise 53.7 percent of the households. This is 19.4 percent

higher than the Metro Service Area average of 34.3% for low-income households. Consequently, this would normally represent a disproportionate burden for the low-income households the new line will serve. However, since the project is a benefit to both the corridor and the low-income households the line will serve, by adding a new rail service and not reducing associated bus services, the disproportionate burden is positive for the low-income population under Title VI, which does not require any review of alternative options for mitigation. The new services will also avoid the need for many riders to change trains to the heavy rail network to cross downtown LA to continue their journeys.

Outreach

Throughout the development and construction of the Regional Connector Transit project, Metro has provided a comprehensive bilingual (English/Spanish) and multilingual (English, Spanish, Korean and Japanese in the community of Little Tokyo) outreach and communications program. This includes door-to-door outreach, community construction update meetings, key stakeholder group briefings and presentations, distribution of construction notices, e-notifications, on-line communication, and press releases. A fact sheet inclusive of the project's hotline number, website and email address has also been widely distributed and posted on the project website. The Metro Construction Relations team continues to implement this robust outreach and communications program to notify the neighboring communities, stakeholders, and the public at large on the progress of construction.

During the start of the COVID-19 pandemic, the public outreach plan was further supplemented with:

- Weekly e-notifications to over three thousand-project stakeholder list.
- Phone calls to stakeholders.
- Bi-monthly virtual online community construction progress meetings with phone option to participate.
- Ongoing monthly briefings to council staff, neighborhood councils, chambers, and area community-based organizations.
- Banners on construction sites communicating construction timeline.
- Integration of WAZE, NextDoor, and paid advertisement to communicate construction information.

Throughout the rollout of these enhanced communication tactics, Metro has been transparent in its communication with the public on the project schedule and late 2022 forecasted service opening date.

Outreach to local small businesses is a project priority given the construction impacts in the corridor. Metro's outreach practices include through one-on-one phone calls, emails, and presentations to inform the small businesses and business interest groups of the project's schedule. Businesses are also offered enhanced visibility of their establishment through Eat Shop Play, a construction mitigation program offered by Metro. Over 70 small businesses have registered as participants of this program. Eat Shop Play promotes the businesses through organic social media platforms, paid advertisement in English and Spanish on local print and

virtual ads, Metro station digital kiosks, bus cards, banners or spotlighted on e-newsletters. During and post-COVID-19 Safer-at-Home restrictions, the Eat Shop Play email promotional campaign focused on businesses offering online services, and restaurants offering takeout and delivery services. The campaign targeted over 18,000 email subscribers.

In the Environmental Justice community of Little Tokyo, the Business Marketing and Advertisement Program offers year-round programming to promote the culture of the community through unique eateries and shops only found in Little Tokyo. Furthermore, business counseling and support is provided by business counselors through the Business Assistance Center.

The Regional Connector service plan was formally adopted by the Metro Board of Directors at their October 2020 meeting. Community briefings, Metro NextGen Bus Plan public workshops and Metro Service Council meetings were held starting Summer 2019 (as listed below) on the permanent closure of the L Line (Gold) Little Tokyo/Arts District Station and the reopening of the system in Fall 2022 under the new service plan discussed in this analysis:

Community

- July 18, 2019 – Little Tokyo Leaders
- September 9, 2019 – Little Tokyo Leaders
- February 27, 2020 – Central LA Region Round Table
- April 28, 2020 – Little Tokyo Community Council
- May 26, 2020 – Little Tokyo Community Council
- October 26, 2020 – Boyle Heights DRAC

Service Councils

- February 10, 2020 – NextGen/San Gabriel Valley
- February 12, 2020 - NextGen/ Westside Central
- February 13, 2020 – Gateway Cities
- February 13, 2020 - NextGen/Gateway Cities
- February 19, 2020 - NextGen/Gateway Cities
- February 20, 2020 - NextGen/Gateway Cities
- February 22, 2020 – NextGen/All Regions
- March 9, 2020 - San Gabriel
- March 11, 2020 - Westside Central
- March 26, 2020 – NextGen/Westside Central
- April 4, 2020 - NextGen/Westside Central

As a completion date becomes clearer from construction, and Metro begins pre-revenue service testing for the opening of the Regional Connector, outreach will focus on informing the community of this new rail link and associated changes to operating patterns for the light rail Line A, E, and L services in preparation for revenue service expected to start in late 2022.

Conclusion

The Regional Connector Rail project will connect and reconfigure A, E and L Line rail service, providing a benefit to minority population and low-income households that will be served by this new rail corridor. The new services will also avoid the need for many riders to change trains to the heavy rail network to cross downtown LA to continue their journeys.

As a result, the disparate impacts and disproportionate burdens under Title VI are of a positive nature and do not require mitigation. The project will provide new high quality mobility options for the community it will service which is consistent with the overall goal of improving public transit service through expanding rail service coverage across the LA region. Minority and low-income riders will be beneficiaries of the project.

Metro followed requirements of FTA Circular 4702.1B and met the legal test for disparate impact as follows:

- (1) Metro has a substantial legitimate justification for the proposed service change as it works to expand access to high quality rail service and facilities across the Metro service area; and
- (2) Metro has no alternatives that would have a less disparate impact on minority riders but would still accomplish the transit provider's legitimate program goals with the opening of Regional Connector. Staff is therefore requesting the Metro Board adopt this analysis in support of the introduction of the Regional Connector.

Figure 2 – Regional Connector Rail Line – Minority Population

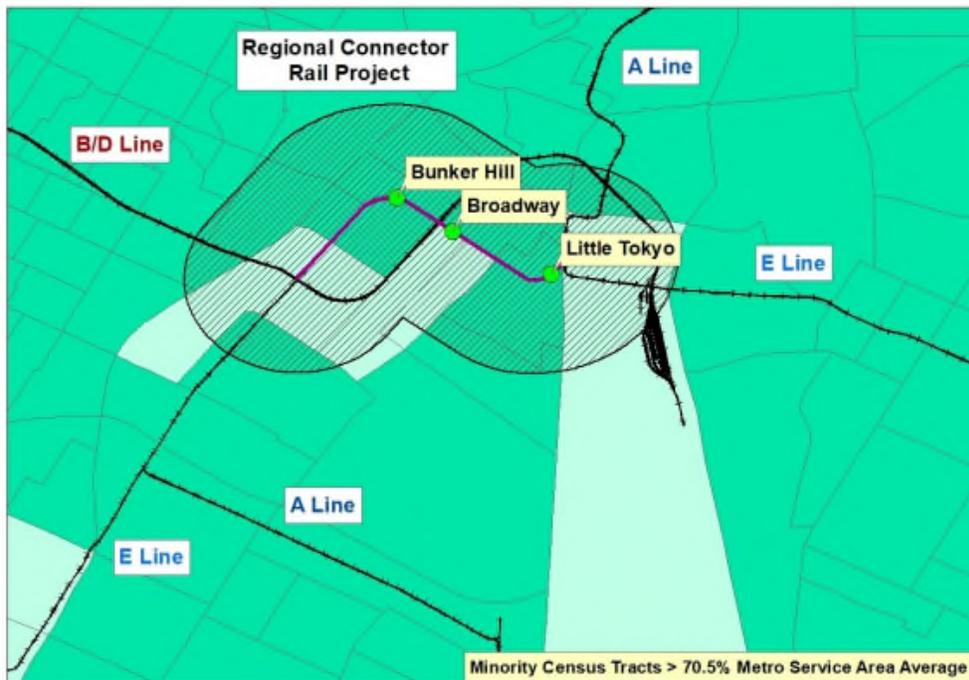
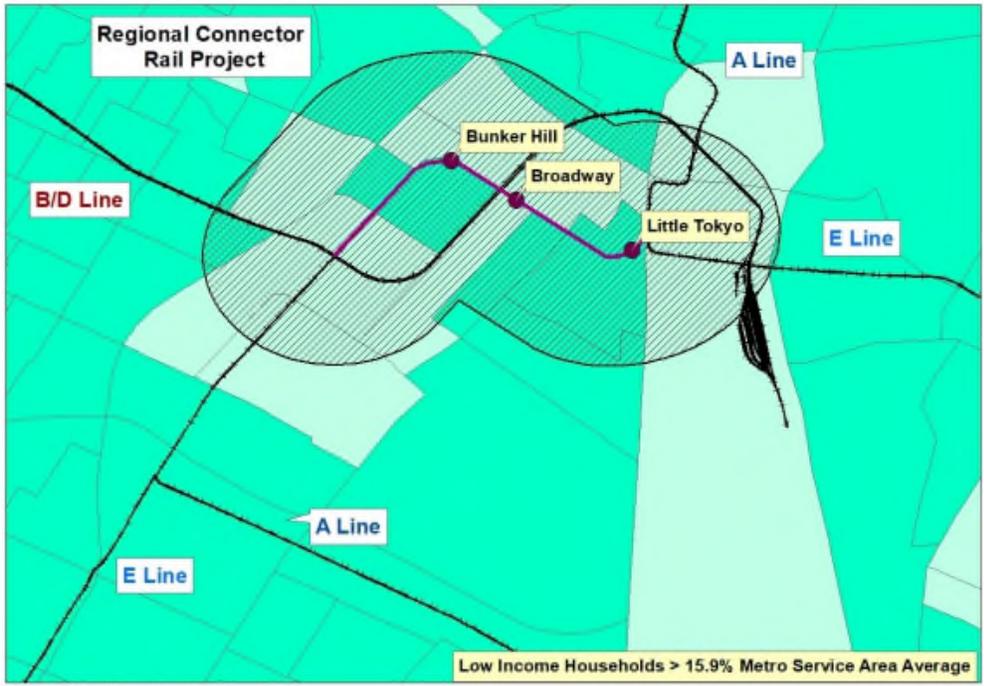


Figure 3 – Regional Connector Rail Line – Low Income Population



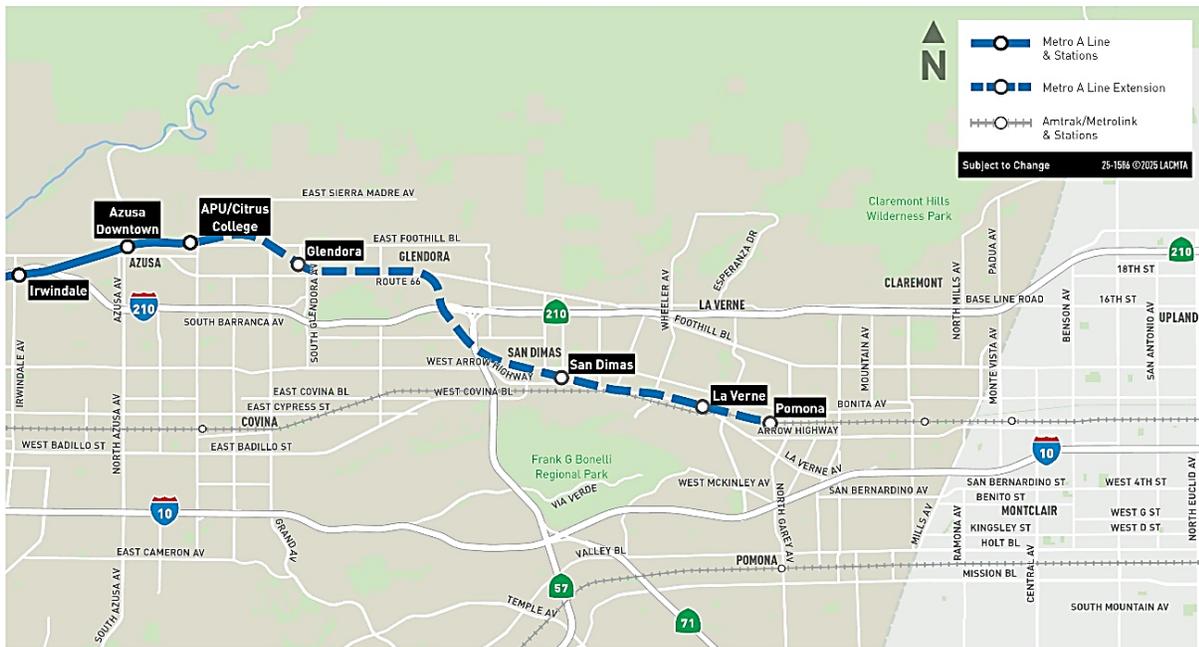
ATTACHMENT F

LA Metro – Foothill 2B Ph. I

(A Line Glendora to Pomona Extension Rail Project)

Title VI Service Equity Analysis

Metro A Line Extension Foothill Extension 2B Phase I



Prepared by Los Angeles Metro Operations Department, April 2025
Agency Recipient ID 5566
Agency Contact: Joanna Lemus, Senior Manager, Civil Rights Programs (Title VI),
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Introduction

Section 601 of Title VI of the Civil Rights Act of 1964 states “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

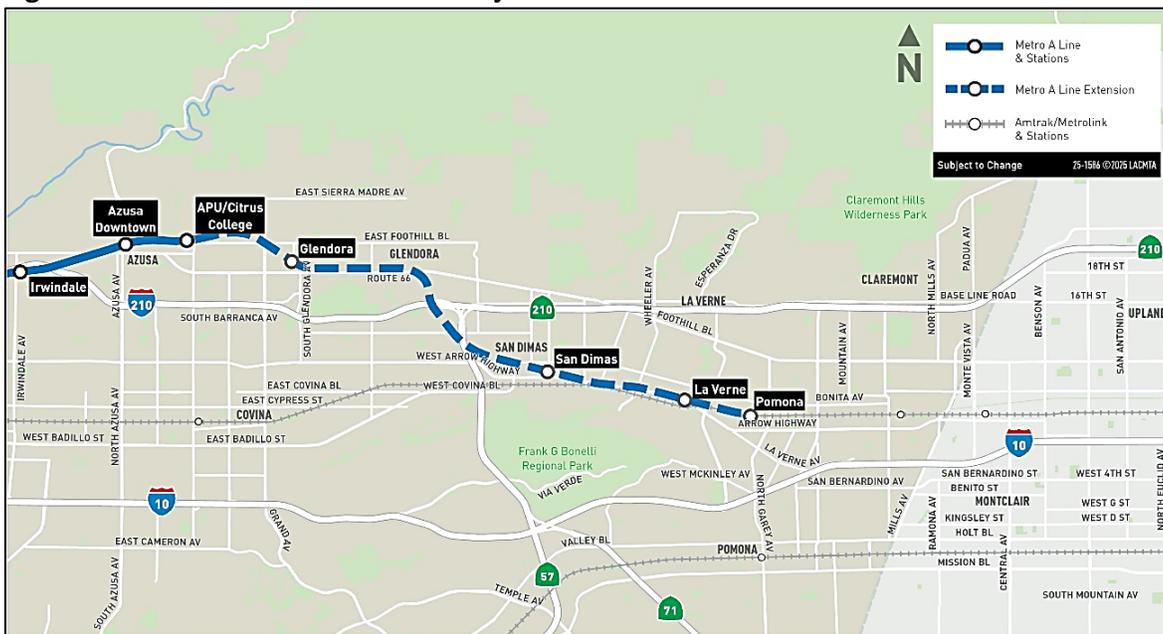
As a recipient of federal funding, LA Metro is required to ensure its programs and activities align with the principles of Title VI. The Foothill 2B Phase I Light Rail Project is an eastern extension of the existing A Line from the APU/Citrus College Station to Pomona and is set to begin revenue service in 2025. In accordance with Federal Transit Administration Title VI guidelines and Metro’s Title VI Plan a Service and Fare Equity (SAFE) Analysis is required to assess the impact of this new service on minority populations.

Background

The Foothill 2B Phase I Rail Project consists of a 9.2-mile extension of the existing A Line light rail, extending from its current northern terminus at APU/Citrus College Station (Figure 1) to Pomona. This extension introduces four new stations located in Glendora, San Dimas, La Verne, and Pomona. The project was constructed by the Foothill Construction Authority and will be owned and operated by Metro.

Metro will operate up to 8-minute peak service weekday mornings and afternoons (6am-9am and 3pm-6pm), with 10-minute frequency between 9am-3pm weekdays and daytime Saturdays and Sundays. Twenty-minute service will be operated during evening and late night periods. These service levels are consistent with the existing A Line service levels.

Figure 1 – Foothill 2B Phase I Line Project



The fare structure for the newly introduced A Line extension will align with the standard pricing applied across Metro's rail and bus network.

The A Line extension extends beyond Metro's primary bus service area and falls predominantly within the Foothill Transit bus service region. Several of their bus lines will directly serve the new A Line stations. To further support seamless integration between bus and rail, Foothill Transit will restructure one existing bus line and introduce a new bus line. Foothill Transit bus lines will serve this extension as detailed here:

- Line 291 serves the Metrolink Pomona North Station (new A Line Pomona Station);
- Line 492 connects to the new San Dimas Station, and;
- Line 284 operates adjacent to the new Glendora Station;
- Line 197 will be rerouted to serve the new La Verne Station;
- Foothill Transit plans to launch a new Line 295, which will provide service to the new San Dimas Station, Cal Poly Pomona, and Mt. San Antonio College.

These changes aim to enhance connectivity, expand transit options, and improve the overall passenger experience for residents throughout the Greater San Gabriel Valley region.

Analysis

Metro's Title VI Policies

Major Service Change Policy

Metro's Major Service Change Policy requires this Title VI Analysis be completed six months before the opening of the new fixed guideway project (e.g., Foothill 2B Phase I). This requirement applies irrespective of whether the service changes meet the thresholds outlined in other subsections of the 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 based on race, color or national origin. This policy defines the threshold Metro will utilize when analyzing the impacts on minority populations and/or riders. For major service changes, a disparate impact will be deemed to have occurred **if the absolute difference between the percentage of minorities adversely affected and the overall percentage of minority riders is at least 5%.**
- Disproportionate Burden refers to a neutral policy or practice that disproportionately affects low-income riders more than non-low-income populations and/or riders. Metro defines low-income as \$69,350 for a four-member household which represents the median income of a four-member household in Los Angeles County. The finding of a disproportionate burden for

major service changes requires Metro to evaluate alternatives and mitigate burdens where practicable. For major service changes, a disproportionate burden will be deemed to exist if **an absolute difference between the percentage of low-income people adversely affected by the service change and the overall percentage of low-income people is at least 5%.**

The definitions of disparate impact and disproportionate burden were adopted in Metro’s Title VI Program which was last updated and approved by Metro’s Board in October 2022. The threshold referenced is taken from the California Department of Housing and Community Development’s 2024 State income Housing Limits; this amount is being referenced as the updated threshold and will be included in the 2025 Title VI update that will be brought to the Metro Board for adoption later this year.

Disparate Impact Analysis Methodology

To assess whether the change will have a disparate impact on minority riders, the ethnicity demographic data of the community this new rail alignment will serve is analyzed. The data is then compared to the ethnicity demographic data of Metro’s entire Service Area. If the absolute difference between the minority percentage along the new rail alignment and the Metro Service Area minority percentage is at least 5%, an impact is deemed to have occurred.

Service and Fare Impacts of New A Line Foothill Extension Glendora to Pomona

When the A Line service is extended to Pomona in mid-2025, approximately 113,000 annual rail revenue hours will be added to the existing transit service to the corridor. No existing light rail segment will see less service as a result of these extra revenue service hours for the A Line extension. As outlined above, the segment between APU/Citrus College and Pomona Stations (serving three intermediate new stations) will have the same levels of service as the rest of the A Line: 8-minute service in the peak periods, and 10-minute service during midday and weekend periods.

The fares for the new A Line extension will be the same as for other Metro rail and bus services and are integrated with the fares for these other services. There are no Metro bus service changes being made because of the new rail services to be operated as described above.

Minority and Low-Income Populations Served by New A Line Foothill Extension Glendora to Pomona

As required under Title VI, Metro has reviewed the minority and low-income populations that will be served by the new 9.2-mile, 4-station Foothill 2B Ph I (A Line Extension Glendora to Pomona) rail service based on being within 0.5 miles of the alignment. The relevant data is shown in Tables 1 and 2 below. There is no ridership data to analyze for demographics as the line is not yet in operation.

The minority population that will be served by the Foothill 2B Ph I rail project (see Figure 2, 0.5-mile catchment) comprises 64.3% of the overall population; the new line will serve a minority population 6.9% lower than the 71.2% average for Metro’s overall service area. This constitutes a disparate impact to the minority population under Title VI. However, since the project is a benefit to both the corridor and the minority population the new line will serve, by adding a new rail service and not

**LA Metro – Foothill 2B Ph. I (A Line Glendora to Pomona Extension Rail Project)
Title VI Service Equity Analysis**

reducing associated Metro bus services, the disparate impact is positive for the minority population under Title VI and does not require any review of alternative options for mitigation.

Figure 2 – Foothill 2B Ph I (A Line Ext. to Pomona) – Minority Population



Table 1

Comparison	Population	Minority Population	Minority Percentage
Foothill 2B Ph I Rail Project	127,145	81,733	64.3%
Metro Service Area	7,580,839	5,397,073	71.2%
Difference Comparison			-6.9%

Note: Data source is the 2023 American Community Survey.

The low-income households that will be served by the Foothill 2B Ph I rail project (see Figure 3, 0.5-mile catchment) comprise 38.7% of the households. This is 6.5% lower than the Metro Service Area average of 45.2% for low-income households. Consequently, this would normally represent a disproportionate burden for the low-income households the new line will serve. However, since the project is a benefit to both the corridor and the low-income households the line will serve, by adding a new rail service and not reducing associated Metro bus services, the disproportionate burden is positive for the low-income population under Title VI and does not require any review of alternative options for mitigation.

Figure 3 – Foothill 2B Ph I (A Line Ext. to Pomona) – Low-Income Population



Table 2

	Number of Households	Number of Low-Income Households	Low-Income Household Percentage
Foothill 2B Ph I Rail Project	42,119	16,313	38.7%
Metro Service Area	2,663,368	1,205,146	45.2%
Difference Comparison			-6.5%

Note: Data source is the 2023 American Community Survey.

Outreach

Throughout the development and construction of the Foothill Extension light rail project, the Foothill Construction Authority conducted an extensive outreach and communications program engaging a wide range of audiences in the corridor area with information and updates about the project. This included key stakeholder group briefings and presentations, distribution of construction notices, e-notifications, and press releases as summarized below. Special accommodations, including Spanish language interpretations were made available upon request for all meetings. A fact sheet containing the project’s hotline number, website, and email address was widely distributed and posted on the project website. In 2011, Public Scoping Meetings on the Proposed Azusa to Montclair Light Rail Extension were held to receive feedback on the project scope, alternatives to be reviewed in the environmental report, and issues needing to be addressed through the draft environmental impact report analysis. Each public scoping meeting drew 60-70 participants. The public comment period was held from December 27, 2010, through February 2, 2011. Meetings were held as follows:

- Wednesday, January 12, 6-8 pm: Ganessa Community Center, Ganessa Park, 1575 N. White Av, Pomona, CA

LA Metro – Foothill 2B Ph. I (A Line Glendora to Pomona Extension Rail Project)
Title VI Service Equity Analysis

- Wednesday, January 19, 6-8 pm: Oakmont Elementary School, 120 W. Green St, Claremont, CA
- Thursday, January 13, 6-8 pm: Timothy Daniel Crowther Teen and Family Center, 241 W. Dawson Av, Glendora, CA
- Thursday, January 20, 6-8 pm: Ekstrand Elementary School, 400 N. Walnut Av, San Dimas, CA

These meetings were publicized through the following methods:

- Direct mail postcards to approximately 15,000 property owners, occupants and stakeholder database (business and community-based organizations, environmental justice groups, etc.)
- Legal notices in the San Gabriel Tribune and the Inland Valley Daily Bulletin
- Display advertising in local newspapers
 - Inland Empire Weekly
 - Inland Valley Daily Bulletin
 - Claremont Courier
 - San Gabriel Valley Tribune
- Digital Media:
 - Project E-News Update, blog, and social media channels (Facebook, Twitter)
 - Email eblast through local chambers of commerce
 - City websites, website calendars and/or newsletters, and social media
- Media Sources /Earned Media
- Outreach calls/e-mails to approx. 75 community/civic organizations and chambers

In 2012, Public Hearings on the Draft Environmental Impact Report for the Azusa to Montclair Project were held to review the Draft EIR and receive feedback. A 45-day public comment and review period was held from August 21, 2012 until October 5, 2012. Hearings were held on the following dates:

- September 20, at 5:30 PM: Montclair Senior Center, 5111 Benito St, Montclair, CA 91763
- September 24, 5:30 PM: Hillcrest Meeting House, 2705 Mountain View Dr, La Verne, CA 91750

These meetings were publicized through the following methods

- Direct mail to 13,946 business and community-based organizations, environmental justice groups, homeowner/resident/neighborhood associations, previous meeting participants, and those who requested information about the project, and residents near the alignment.
- Digital Media:
 - Project E-News Update
 - Email eblast through local chambers of commerce
 - City websites and/or newsletters, city website calendars, social media
- Project social media channels (Facebook, Twitter)
- Media Sources /Earned Media
 - Antonovich.com, Claremont Courier Claremont-La Verne Patch, Courier City Beat, Curbed LA, Inland Valley Daily Bulletin, Monrovia Patch, Pasadena Star-News, Railway Track and Structure, San Gabriel Valley Tribune and Whittier Daily News

In 2015, Community Open House Meetings were held in each city, to update the community on the project status and schedule from Azusa to Montclair, highlight station art/artists, and receive initial art concepts feedback.

LA Metro – Foothill 2B Ph. I (A Line Glendora to Pomona Extension Rail Project)
Title VI Service Equity Analysis

- La Verne - April 16, 6-8 PM: La Verne Community Center, 3680 “D” St, La Verne, CA 91750-
- Montclair - April 21, 6-8 PM: Montclair Senior Center, 5111 Benito St, Montclair, CA 91763-
- Glendora - April 23, 6-8 PM: Glendora Public Library, 140 S. Glendora Av, Glendora, CA 91741
- Claremont - April 29, 6-8 PM: Alexander Hughes Community Center - Padua Room, 1700 Danbury Rd, Claremont, CA 91711
- San Dimas - April 30, 6-8 PM: San Dimas Senior Center, 201 E. Bonita Av, San Dimas, CA 91773-
- Pomona - May 7, 6-8 PM: Palomares Park Community Center, 499 E. Arrow Hwy, Pomona, CA 91767

These meetings were publicized through the following methods

- E-communications toolkit distributed to key organizations to supplement notification
- Display advertising in local newspapers and social media
 - Inland Valley Daily Bulletin
 - Claremont Courier
 - San Gabriel Valley Tribune
 - Los Angeles Times
 - Facebook Ad
- Digital Media:
 - Project E-News Update, website, blog, and social media channels (Facebook, Twitter)
 - Email eblast through local chambers of commerce
 - City websites, website calendars and/or newsletters, social media
- Media Advisories
- Direct mail postcards to approximately thousands of property owners within ½- mile of the rail corridor, plus email invitations to the project stakeholder database.

In 2017, Community Open House Meetings were held in each city to update the community on the project status and schedule from Azusa to Montclair, highlight station art/artists and what to expect during construction.

- Thursday, July 13, San Dimas Senior/Community Center, 201 E. Bonita Av, San Dimas, CA 91773
- Tuesday, July 18, Palomares Park Community Center, 499 E. Arrow Hwy, Pomona, CA 91767
- Wednesday, July 19, Montclair Senior Center, 5111 Benito St, Montclair, CA 91763
- Monday, July 24, Alexander Hughes Community Center, 1700 Danbury Rd Claremont, CA 91711
- Thursday, August 3, Hillcrest Retirement Community, 2705 Mountain View Dr, La Verne, CA 91750
- Monday, August 7, Glendora Library, Bidwell Forum, 140 S. Glendora Av, Glendora, CA 91741

These meetings were publicized through the following methods

- E-communications toolkit distributed to key organizations to supplement notification
- Display advertising in local newspapers and social media
 - Inland Valley Daily Bulletin
 - Claremont Courier
 - San Gabriel Valley Tribune
 - San Gabriel Examiner
 - Los Angeles Times
 - Facebook Ad

- Digital Media:
 - Project E-News Update, website, blog, and social media channels (Facebook, Twitter)
 - Email eblast through local chambers of commerce
 - City websites, website calendars and/or newsletters, social media
- Media Advisories
- Direct mail postcards to approximately thousands of property owners within ½- mile of the rail corridor, plus email invitations to the project stakeholder database.

On Monday, December 10, 2018 (5:30-7:30 PM) at La Verne Community Center, 3680 D St, La Verne CA 91750, a Scoping Meeting for the Supplemental Environmental Impact Report (SEIR) was held to discuss possible construction and operation phasing for the 12.3-mile, six-station Glendora to Montclair Project, and a proposed modification to the future parking facility location at Pomona Station. The public comment period was held from December 10, 2018 - January 4, 2019 (approximate start date). The meeting was publicized through the following methods:

- Printed and mailed libraries for public counter distribution
- E-communications toolkit distributed to key organizations to supplement notification
- Legal notices in the San Gabriel Tribune and the Inland Valley Daily Bulletin
- Display advertising in local newspapers and social media
 - Inland Valley Daily Bulletin
 - Claremont Courier
 - San Gabriel Valley Tribune
 - San Gabriel Valley Examiner
 - Los Angeles Times
 - Facebook Ad
- Digital Media:
 - Project E-News Update, website, blog, and social media channels (Facebook, Twitter)
 - Email eblast through local chambers of commerce
 - City websites, website calendars and/or newsletters, social media
- Media Advisories

A Public Hearing to review and comment on the Draft Supplemental Environmental Impact Report (SEIR) was held on Tuesday, April 16, 2019 (5:30 – 8:30 PM). The Hearing started at 6 PM at La Verne Community Center, 3680 D St, La Verne, CA 91750. The public comment period was held from March 22, 2019 - May 6, 2019. The hearing was publicized through the following methods:

- Printed and mailed or emailed notices to libraries chambers of commerce and cities for public counter distribution
- E-communications toolkit distributed to key organizations to supplement notification
- Legal notices in the San Gabriel Tribune and the Inland Valley Daily Bulletin
- Display advertising in local newspapers and social media
 - Inland Valley Daily Bulletin
 - Claremont Courier
 - San Gabriel Valley Tribune
 - San Gabriel Valley Examiner
 - Los Angeles Times
 - La Nueva Voz
 - Mid Valley News
 - Facebook Ad

- Digital Media:
 - Project E-News Update, website, blog, and social media channels (Facebook, Twitter)
 - Email eblast through local chambers of commerce
 - City websites, website calendars and/or newsletters, social media
- Media Advisories

In 2020, Community Open Houses were convened to update the community on the project status and schedule as it was readied for construction. The design-build team, Draft Baseline Schedule, staff and station artists were available to discuss the project and answer questions. While there was information on the Pomona to Montclair segment of the project, the open houses focused on the beginning of construction for the Glendora to Pomona segment. Open house meetings were held as follows:

- Glendora - Thursday, March 5: Glendora Public Library, Bidwell Forum, 140 S. Glendora Av, Glendora, CA 91741. Station Artist: Michael Hillman
- La Verne - Tuesday, March 10: La Verne Community Center, 3680 “D” St, La Verne, CA 91750. Station Artist: Blue McRight
- Pomona - Wednesday, March 11: Palomares Community Center, 499 E Arrow Hwy, Pomona, CA 91767. Station Artist: Steve Farley
- San Dimas - Thursday, March 12: Stanley Plummer Community Building 245 East Bonita Av, San Dimas, CA 91773. *Station Artist: Eugene & Anne Daub (meeting cancelled due to COVID and start of Stay-at-Home orders)*

These meetings were publicized through the following methods:

- Printed and mailed or emailed notices to libraries chambers of commerce and cities for public counter distribution
- E-communications toolkit distributed to key organizations to supplement notification
- Display advertising in local newspapers and social media
 - Inland Valley Daily Bulletin
 - San Gabriel Valley Tribune
 - San Gabriel Valley Examiner
 - College Newspapers: University of La Verne, Citrus College, Cal Poly Pomona
 - Los Angeles Times
 - La Nueva Voz
 - Facebook Ad
- Digital Media:
 - Project E-News Update, website, blog, social media channels (Facebook, Twitter)
 - Email eblast through local chambers of commerce
 - City websites and/or newsletters, city website calendars, social media,
- Media Advisories

A Virtual Public Scoping Meeting for the Supplemental Environmental Impact Report (SEIR) 2 was held on Wednesday, June 24, 2020, 5:30 PM-7 PM due to COVID Stay-at-Home orders. The meeting was held to update the community on the Glendora to Montclair project and receive input on impacts of concerns for the Project Modifications including potential changes to proposed parking at station locations in Glendora, San Dimas, La Verne, Pomona and

Claremont. Public comments were accepted through July 8, 2020. The meeting was publicized through the following methods:

- Agency coordination with cities and school districts
- E-communications toolkit distributed to key organizations to supplement notification
- Legal notices in the San Gabriel Tribune and the Inland Valley Daily Bulletin
- Digital Media:
 - Project E-News Update, website, blog, and social media channels (Facebook, Twitter)
 - City websites and/or newsletters, city website calendars, social media,
- Local and regional media outlets received Project E-News Update

As the project moved from planning to construction, the Construction Authority implemented proactive communication strategies with stakeholders including residents, small and large businesses, cities, higher education institutions, emergency responders, community service organizations, senior housing organizations, media outlets and others. The primary goal was to utilize a “no surprises” approach that proactively informed stakeholders about upcoming construction and potential impacts. Since the beginning of construction in 2020, the Authority kept the community apprised of over 200 street closures and directly distributed more than 47,500 construction notices. Construction notices in English and Spanish were made available to Pomona stakeholders at the City’s request (no other city requested additional languages). A comprehensive list of notification tactics to support the “no surprises” approach is included below. Additionally, over 430 inquiries were received and responded to by the project team through the project hotline and email.

In addition to direct outreach to the most impacted residents and businesses, the Construction Authority kept the general public updated on the project and how to ask questions through the following:

- Weekly pictures of the week, monthly e-news updates, quarterly newsletters
- On-line interactive construction map with widget for stakeholder websites
- Robust public information materials (newsletters, factsheets, 3D station models, website, blog, monthly and topic-specific videos)
- Construction signage
- Community presentations, briefings and meetings
- Neighborhood walks and activity center outreach
- Traditional media and social media
- Advertisements in local newspapers
- Partnerships with cities, chambers of commerce and Unified School Districts to maximize reach

A Virtual Community Update Meeting was held on Wednesday, May 19, 2021: 6 PM-7 PM to update the community on progress and the latest construction update, including project schedule, stations and art component, parking, upcoming bridge construction, and more. The meeting was publicized as follows:

- Door-to-door notice distribution
- E-communications toolkit distributed to key organizations to supplement notification
- Legal notices in the San Gabriel Tribune and the Inland Valley Daily Bulletin
- Display advertising in local newspapers and social media:
 - Inland Valley Daily Bulletin
 - San Gabriel Valley Tribune
 - San Gabriel Valley Examiner
 - Los Angeles Times
 - La Nueva Voz
 - Claremont Courier
 - Facebook Ad
 - College Newspapers:
University of La Verne, Cal
Poly Pomona
- Digital Media:
 - Project E-News, website, blog, and social media channels (Facebook, Twitter)
 - Email eblast through local chambers of commerce
 - City websites and/or newsletters, city website calendars, social media,
- Media Advisories

A Virtual Public Scoping Meeting for Draft Supplemental Environmental Impact Report 3 was held on Tuesday, October 26, 2021 starting at 5:30 PM to discuss potential project modifications in the City of San Dimas and receive feedback regarding the scope and content of the SEIR 3. The public comment period was held from October 14, 2021-November 19, 2021.

The meeting was publicized as follows:

- Outreach included direct email to the most interested stakeholders
- E-communications toolkit distributed to key organizations to supplement notification
- Legal notices in the San Gabriel Tribune and the Inland Valley Daily Bulletin
- Digital Media:
 - Project E-News Update, website, blog, and social media channels (Facebook, Twitter)
 - City websites and/or newsletters, city website calendars, social media

A Virtual Public Scoping Hearing was held on Tuesday, October 26, 2021, starting at 5:30 PM to announce the release of Draft Supplemental Environmental Impact Report (SEIR) 3 for proposed Project Modifications to the Glendora to Montclair Project in the City of San Dimas. The document was made available online and via hard copy or CD versions upon request. In light of the COVID-19 pandemic, viewing of the document in person was only available by appointment. A 45-day public comment period was held from February 18, 2022 - April 4, 2022.

The meeting was publicized as follows:

- Outreach included direct emails
- Legal notices in the San Gabriel Tribune and the Inland Valley Daily Bulletin advertising the Notice of Availability and comment period
- Draft SEIR3 and NOA were placed on the Authority’s website
- Project E-News Update, blog, and social media channels (Facebook, Twitter)
- Media advisories

Additional Events and Presentations

Authority staff also participated in a variety of events and presentations to inform stakeholders about the project and encourage participation in public meetings; a sampling is provided below:

Event/Presentation Name	Date
Chambers of Commerce and BIDs (Glendora, San Dimas, La Verne, Pomona, Claremont and Montclair)	Multiple presentations to each over the years
Glendora Earth Day Festival	Annual participation
Claremont Earth Day	Annual participation
San Dimas Earth Day	Annual participation
San Dimas Birthday Celebration	Annual participation
Rotary and Kiwanis Presentations (Glendora, Pomona, Claremont)	Multiple project updates to each group
University Club of Claremont	Multiple project updates
La Verne and Claremont Transportation Commissions	Multiple project updates
San Dimas Business Round Table	October 21 and 22, 2020
State of the City – Glendora, San Dimas, La Verne, Pomona, Claremont and Montclair	Annual participation or as available
Hillcrest Continuing Care Retirement Community	Annual participation
San Gabriel Valley Older Adult Transportation	Multiple presentations over the years
Citrus College President and Board Briefing	Multiple presentations over the years

Metro’s San Gabriel Valley Service Council also received information regarding the various meetings and briefings that were held throughout the project planning and construction, which were shared through their meetings. The Service Council also received periodic briefings on the project on July 10, 2017, August 10, 2020, and Monday, March 11, 2024. Service Council meetings are subject to the Brown Act and were publicized through Metro’s website, e-notifications, and posts on Metro’s blog, The Source. Their meetings are open to the public.

The Foothill Extension service plan was formally adopted by Metro Board at their December 2018 meeting. As project construction was completed and the project turned over to Metro to begin pre-revenue service testing for the opening of the first segment from Glendora to Pomona, Metro will focus outreach on informing the community of the start date for this new service.

Conclusion

The A Line Extension Foothill 2B Phase I project extends light rail service from Glendora to Pomona, enhancing transit accessibility for minority populations and low-income households along the new rail corridor. This extension has been evaluated under Title VI and determined

not to impose disparate impacts or disproportionate burdens, thus eliminating the need for mitigation. The A Line rail extension will deliver high-quality mobility options to the community aligning with the overarching objective of improving public transit services by expanding rail coverage throughout the Los Angeles region. Minority and low-income riders will significantly benefit from this light rail extension.

Metro followed the requirements of FTA Circular 4702.1B and met the legal test for disparate impact as follows:

(1) Metro has a substantial legitimate justification for the proposed service change as it works to expand access to high-quality rail service and facilities across the Metro service area; (2) Metro has no alternatives that would have a less disparate impact on minority riders but would still accomplish the transit provider's legitimate program goals with the opening of Foothill 2B Ph 1. Staff therefore requests that the Metro Board adopt this analysis in support of the impending extension of the A Line service to Pomona.

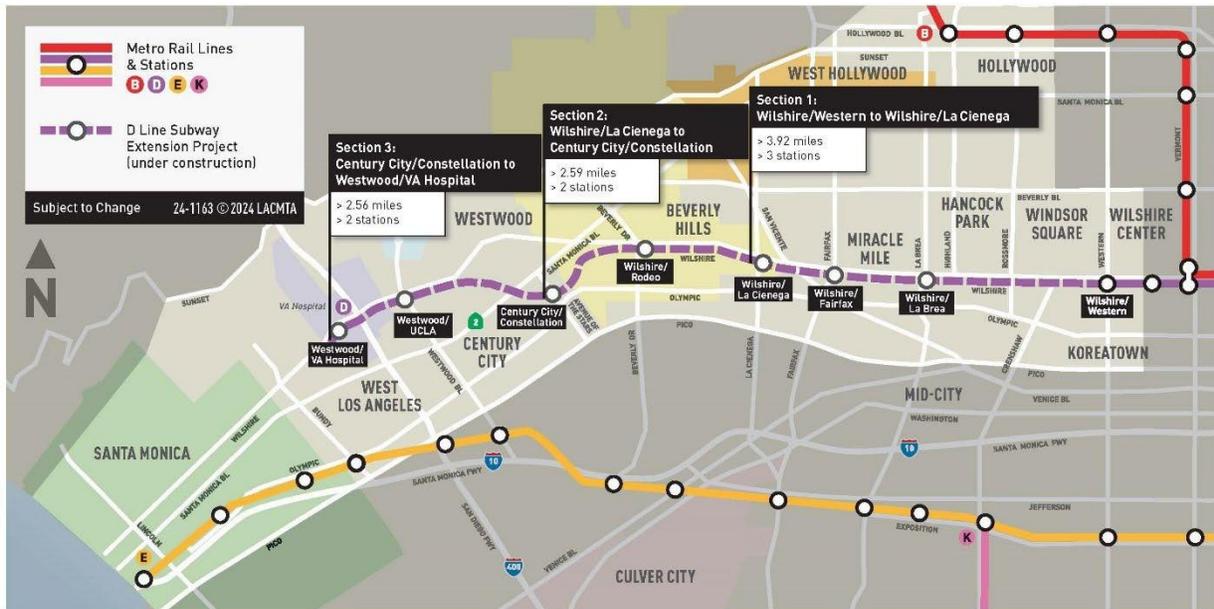
ATTACHMENT G

Metro – D Line Subway Extension Project

Sections 1, 2, and 3

Title VI Service and Fare Equity Analysis

D LINE SUBWAY EXTENSION PROJECT



Prepared by Los Angeles Metro Operations Department, June 2025

Agency Recipient ID 5566

Agency Contact: Joanna Lemus, Senior Manager, Civil Rights Programs (Title VI),

Office of Civil Rights & Inclusion

(Phone 213.922.4067; lemusj@metro.net)

Introduction

Section 601 of Title VI of the Civil Rights Act of 1964 states “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

As a recipient of federal funding, LA Metro is required to ensure its programs and activities align with the principles of Title VI. The D Line Subway Extension Project is a western extension of the D Line from the Wilshire/Western Station to Westwood and is set to begin revenue service later in 2025. In accordance with Federal Transit Administration Title VI guidelines and Metro’s Title VI Plan a Service and Fare Equity (SAFE) Analysis is required to assess the impact of this new service on minority populations.

Background

The D Line Subway Extension Project will continue from the current D Line terminus at the Wilshire/Western Station, extending westward for nearly nine miles along Wilshire Bl, and will add seven new stations. The extension is being constructed and will open service in three sections. Existing D Line heavy rail (subway) service would continue to operate between Union Station and Wilshire/Western Station, then continue west to serve:

- New Section 1 Stations: Wilshire/La Brea, Wilshire/Fairfax, and Wilshire/La Cienega Stations later in 2025;
- New Section 2 Stations: Wilshire/Rodeo (construction name) and Century City Stations, projected opening Summer 2026;
- New Section 3 Stations: Westwood/UCLA and Westwood/VA Hospital, projected opening Summer 2027.

Figure 1 – D Line Subway Extension



Analysis - Metro’s Title VI Policies

Major Service Change Policy

Metro’s Major Service Change Policy requires this Title VI Analysis be completed six months before the opening of the new fixed guideway project (e.g., D Line Subway Extension). This requirement applies irrespective of whether the service changes meet the thresholds outlined in other subsections of the 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 based on race, color or national origin. This policy defines the threshold Metro will utilize when analyzing the impacts on minority populations and/or riders. For major service changes, a disparate impact will be deemed to have occurred **if the absolute difference between the percentage of minorities adversely affected and the overall percentage of minority riders is at least 5%.**
- **Disproportionate Burden** refers to a neutral policy or practice that disproportionately affects low-income riders more than non-low-income populations and/or riders. Metro defines low-income as \$69,350 for a four-member household which represents the median income of a four-member household in Los Angeles County. The finding of a disproportionate burden for major service changes requires Metro to evaluate alternatives and mitigate burdens where practicable. For major service changes, a disproportionate burden will be deemed to exist **if an**

absolute difference between the percentage of low-income people adversely affected by the service change and the overall percentage of low-income people is at least 5%

The definitions of disparate impact and disproportionate burden were adopted in Metro's Title VI Program which was updated and approved by Metro's Board in October 2022. The threshold referenced is taken from the California Department of Housing and Community Developments 2024 State income Housing Limits; this amount is being referenced as the updated threshold and will be included in the 2025 Title VI update that will be brought to the Metro Board for adoption later this year.

Disparate Impact Analysis Methodology

To assess whether the change will have a disparate impact on minority riders, the ethnicity demographic data of the community this new rail alignment will serve is analyzed. The data is then compared to the ethnicity demographic data of Metro's Service Area. If the absolute difference between the minority percentage along the alternatives and the Metro Service Area percentage is at least 5%, an impact is deemed to have occurred.

Service and Fare Impacts

Revenue service hours will be added to the existing transit service with the opening of each section as follows:

- New Section 1 Stations: Wilshire/La Brea, Wilshire/Fairfax, and Wilshire/La Cienega projected opening in mid to late 2025. Approximately 113,000 annual rail revenue hours will be added to the existing transit service on the corridor.
- New Section 2 Stations: Wilshire/Rodeo (construction name) and Century City Stations, projected opening end of 2026. Approximately 28,810 annual revenue hours will be added to the existing transit service on the corridor.
- New Section 3 Stations: Westwood/UCLA and Westwood/VA Hospital, projected opening Summer 2027. Approximately 36,640 annual revenue hours will be added to the existing transit service on the corridor.

As outlined above, the segment from the current terminus Wilshire/Western Station and the terminus station with the opening of each section will have the same levels of service as the rest of the D Line: 5-minute peak service weekdays, 10-minute off peak weekday and daytime weekend service, and 20-minute evening/late night service.

Potential Metro Bus service changes include:

- Line 720 will be gradually modified to become a peak period only service weekdays as outlined in NextGen Bus Plan. This is based on expected movement of

passengers from this service to the D Line as it extends. Line 20 service will be increased to ensure a good quality local bus service between the D Line stations between Downtown LA, Westwood, and to Santa Monica.

- There is also an approved change for a new Line 610 between Wilshire/La Brea D Line and Hollywood/Vine B Line Stations, replacing the north end of Line 210. Line 210 northern terminus would become Wilshire/La Brea D Line Station instead of Wilshire/Western D Line and Hollywood/Vine B Line Stations. Evolving ridership patterns will be monitored as each phase of the D Line extensions opens, and changes planned for the above bus services may be modified.

These changes aim to enhance connectivity, expand transit options, and improve the overall passenger experience for residents throughout the Greater West Los Angeles region.

The fares for the new D Line Extension will be the same as for other Metro rail and bus services and are integrated with the fares for these other services.

Minority and Low-Income Populations Served by New D Line Subway Extension Sections 1, 2, and 3

As required under Title VI, Metro has analyzed the minority and low-income populations that will be served by the new D Line Subway Extension rail service based on being within 0.5 miles of the alignment. As Lines 20 and 720 are also being impacted, data for their catchment area is also included. Their catchment area is defined as 0.25 miles of corresponding bus service.¹ The relevant data is shown in Table 1 below. There is no demographic ridership data to analyze for rail service along this alignment as the line is not yet in operation.

Table 1

Comparison	Population	Minority Population	Minority Percentage
D Line Extension	252,075	116,799	46.3%
Line 720 Deletion	-353,403	-202,304	57.2%
Line 20 Service Increase	351,868	201,699	57.3%
D Line Extension Impact Corridor	250,540	116,594	46.4%
Metro Service Area	7,580,839	5,397,073	71.2%

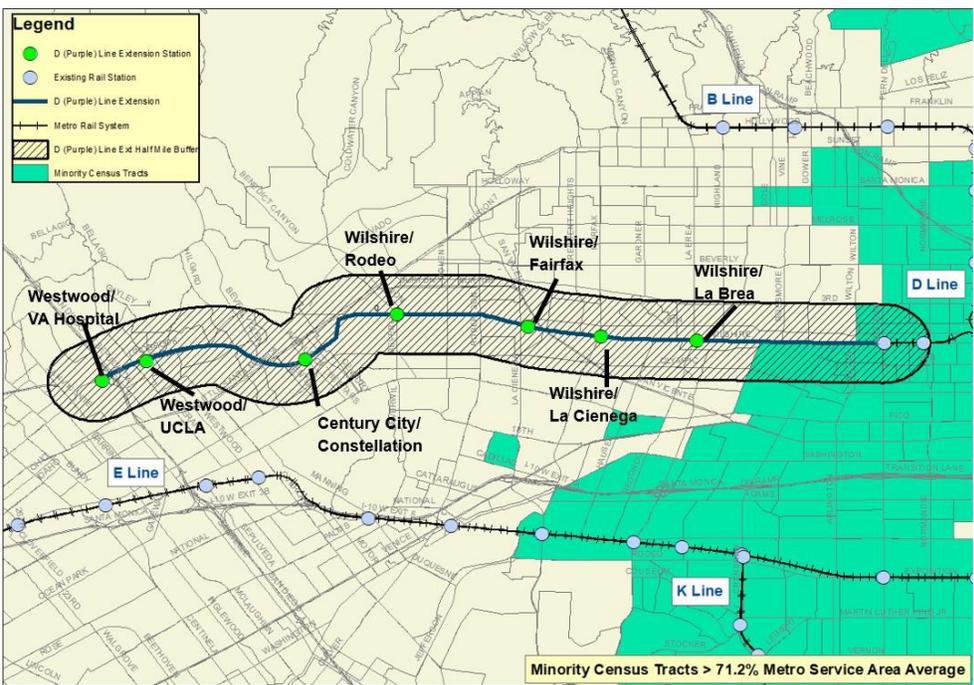
¹ A buffer of 0.25 miles is used since the average rider tends to walk only 0.25 miles for bus service as opposed to 0.5 for rail service.

Difference Comparison	-24.8%
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Note: Data source is the 2023 American Community Survey.

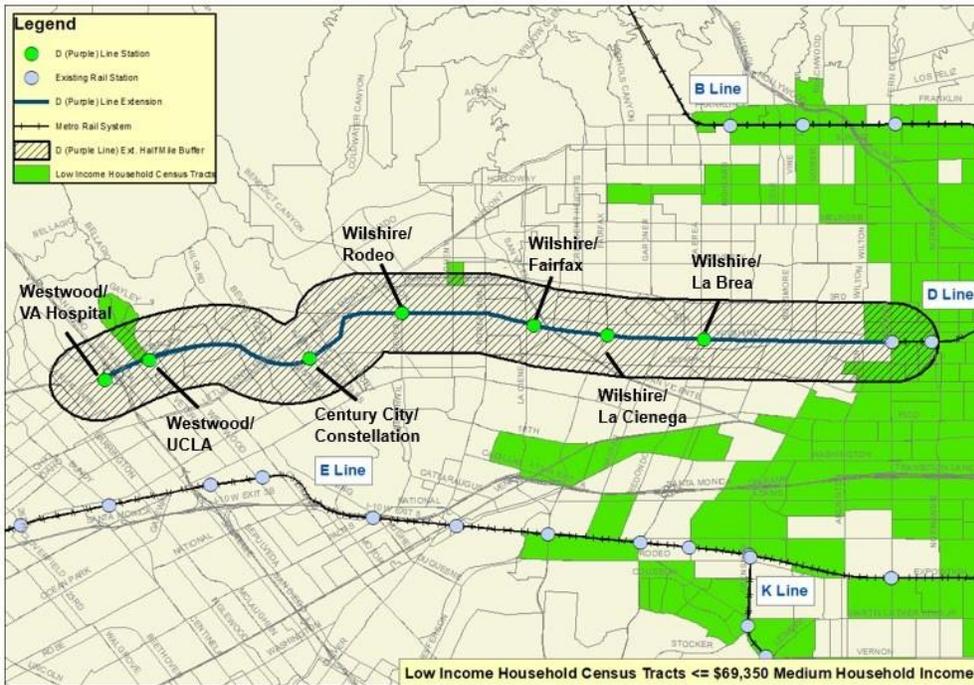
The minority population that will be served by the D Line Subway Extension Subway Project Impact Corridor (see Figure 2, 0.5-mile catchment) comprises 84.4% of the overall population; the new line will serve a minority population 24.8% lower than the 71.2% average for Metro’s overall service area. This constitutes a disparate impact to the minority population under Title VI. However, since the project is a benefit to both the corridor and the minority population the new line will serve, the adding of new rail service and discontinuing Line 720 will be offset by increasing service on Line 20. Thus, the disparate impact is positive for the minority population under Title VI and does not require any review of alternative options for mitigation.

Figure 2 – D Line Subway Extension – Minority Population



The low-income households that will be served by the D Line Subway Extension Project Impact Corridor (see Figure 3, 0.5-mile catchment with 0.25 catchment for Lines 20 and 720) comprise 46.4% of the households.

Figure 3 – D Line Subway Extension – Low-Income Population



This is 1.2% higher than the Metro Service Area average of 45.2% for low-income households. Since this is within the 5% threshold, there is no disproportionate burden on low-income households. Consequently, this would normally represent a disproportionate burden for the low-income households the new line will serve. However, since the project is a benefit to both the corridor and the low-income households the line will serve by adding a new rail service and not reducing associated Metro bus services, the disproportionate burden is positive for the low-income population under Title VI and does not require any review of alternative options for mitigation. Reference Table 2 for analysis.

Table 2

	Number of Households	Number of Low-Income Households	Low-Income Household Percentage
D Line Extension	112,666	47,193	41.9%
Line 720 deletion	-172,562	-86,021	49.8%
Line 20 service increase	171,551	85,793	50.0%
D Line Extension Impact Corridor	111,665	85,783	42.1%
Metro Service Area	2,663,368	1,205,146	45.2%
Difference Comparison			-3.1%

Note: Data source is the 2023 American Community Survey.

Outreach

The D Line Subway Extension project was approved by the Metro Board of Directors on April 26, 2012. The service plan was approved by the FTA on March 28, 2023. Throughout the project approval, environmental review process, planning, and construction of the D Line Subway Extension project, Metro's Community Relations Department conducted an extensive outreach and communications program. This included key stakeholder group briefings and presentations, distribution of construction notices, e-notifications, and press releases. Fact sheets containing the project's hotline number, website, and email address was widely distributed and posted on the project website.

Project staff also provided periodic in person and virtual updates via community meetings and through Metro's Westside Central Service Council on the various aspects of the project, including construction impacts, station naming, and overall construction progress. Metro Service Councils are advisory bodies composed of transit advocates, municipal operator representatives, and riders. Council meetings are held at locations within their respective service regions, and serve as one of Metro's many venues for community engagement. A summary of community meetings is provided in Attachment A.

As project construction is completed and each segment approved for Metro to begin prerenue service testing, outreach will focus on informing the community of the start date for this new service as opening dates are scheduled for each section.

Conclusion

The D Line Subway Extension Sections 1, 2, and 3 will extend the D Line rail service from its current terminus at Wilshire/Western nearly nine miles west to Westwood, enhancing transit accessibility for minority populations and low-income households along the new rail corridor. This extension has been evaluated under Title VI and determined to not impose disparate impacts or disproportionate burdens, thus eliminating the need for mitigation. The D Line rail extension will deliver high-quality mobility options to the community, aligning with the overarching objective of improving public transit services by expanding rail coverage throughout the Los Angeles region. Minority and low-income riders will significantly benefit from this subway extension.

Metro followed the requirements of FTA Circular 4702.1B and met the legal test for disparate impact as follows:

- (1) *Metro has a substantial legitimate justification for the proposed service change as it works to expand access to high-quality rail service and facilities across the Metro service area;*
- (2) *Metro has no alternatives that would have a less disparate impact on minority riders but would still accomplish the transit provider's legitimate program goals with the opening of D Line Subway Extension Sections 1, 2, and 3.*

D Line Subway Extension Project Title VI Service and Fare Analysis

Staff therefore requests that the Metro Board adopt this analysis in support of the impending extension of the D Line service.

**Metro – D Line Subway Extension Project Sections 1, 2, and 3
Title VI Service and Fare Equity Analysis
Outreach Summary**

List of meetings, with the name/focus, and invitees since 2017

Dates & Sections	Meeting Name	Meeting Topic	Invitees
5.13.09 PLE Draft EIS EIR	Westside Central Service Council	Release of project Draft EIS EIR and public comment process	Westside Central Service Council and public
10.19.11 Century City Station	Westside Central Service Council	Century City Station Options Geological Survey	Westside Central Service Council and public
8.13.14 Utility Relocation	Westside Central Service Council	Utility Relocation	Westside Central Service Council and public
Initiated Fall 2014	Pre-construction and construction update	project team provided construction updates, including station progress, a construction schedule of what to expect that include impacts related to noise and vibration, and updated fact sheets for reference Meetings held periodically throughout all Section 1 activity.	Business organizations, chambers of commerce, business improvement districts, neighborhood councils, community councils, homeowners and residents associations, arts organizations, and elected officials representing the project area
5.5.16	Westside Central Service Council	La Brea Decking	Westside Central Service Council and public
6/16 to present	Construction Update Meeting	Construction progress is always discussed, as is the project's effect on the local communities. These meetings are a key channel for distributing Construction Notices and other project information. Held via Zoom and in-person	Wilshire Center Koreatown, , Mid City West, Greater Wilshire Neighborhood Council members and the public..
11.9.16	Westside Central Service Council	Purple Line Extension Update	Westside Central Service Council and public

Every Friday PLE 3	Greater Los Angeles Veterans Administration	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	GLAVA Operations and Facilities Management
2.2.17, 4.25.17 9.28.17 PLE 2	Pre Construction AUR Meeting	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	Community Residents and Stakeholders from Beverly Hills and Century City

Dates & Sections	Meeting Name	Meeting Topic	Invitees
6.8.17, 8.17.17 11.29.17 PLE 2	Century City Building Managers Briefings	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	Property Managers and Staff
6.27.17 PLE 2	BH Sunrise Senior Residential	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	Facility Manager and Staff
7.25.17 PLE 2	Beverly Hills/ Spago Meeting	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	Restaurant owners and mgmt.
9.13.17, 10.11.17 11.8.17, 12.13.17 1.10.18, 2.7.18 3.7.18, 4.4.18 5.2.18, 6.6.18 7.11.18, 8.1.18 9.5.18, 10.3.18 11.7.18, 12.12.18 Sections 1 & 2	Beverly Hills Stations Community Meetings	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	Businesses, residents and stakeholders in the City of Beverly Hills and LA County residents
1.22.18 PLE 2	LA/BH Realtors	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	Licensed Brokers and Real Estate Agents
2.8.18, 4.12.18 PLE 2	Beverly Hills Chamber Presentation	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	BH Chamber Board of Directors
2.21.18, 4.25.19 4.25.19, 1.30.25 PLE 2	Century City BID	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	Century City BID Board of Directors
2.22.18, 5.24.18 8.23.18, 11.13.18 2.21.19, 5.16.19 8.15.19, 11.12.19 PLE 2	Beverly Hills and Century City Stakeholders	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	Businesses, residents and stakeholders in the City of Beverly Hills and LA County residents
3.7.18 PLE 2	Watt Plaza Tenant Lunch & Learn	Project overview and details of Constellation full closure	Watt Plaza tenants

3.23.18 PLE 2	Century City Arts Council	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	Arts Council Board of Directors
4.10.18 PLE 2	Century Glen HOA meeting	Update on construction status, milestones reached, look ahead	Members of the HOA

Dates & Sections	Meeting Name	Meeting Topic	Invitees
		schedule, construction mitigation programs address public's questions.	
5.2.18 PLE 2	Century City Chamber	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	Century City Chamber Board of Directors
6.5.18 PLE 2	Century City Community Meeting Lunch & Learn	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	Businesses, residents and stakeholders in the City of Beverly Hills and LA County residents
7.19.18 PLE 2	211 S Spalding HOA Meeting	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	HOA Members
9.15.18 PLE 2	CIM Group 9460 Wilshire	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	Property management Team
3.21.19, 6.11.19 6.20.19, 9.19.19 6.18.20, 2.25.25 5.13.25, 11.12.24 PLE 3	Webinar Community Meeting	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	Businesses, residents and stakeholders along the project alignment and LA County residents
4.4.19, 6.6.19 8.1.19, 10.13.19 4.4.19, 6.6.19 8.1.19, 10.13.19 PLE 2	Century City CBRE Tenants Meeting	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	CBRE Tenants
4.23.19 PLE 2	Waldorf Astoria	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs, answer questions.	Management

6.10.19 PLE 2	10000 Santa Monica Bl	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	Residential Property Management
8.7.19 PLE 2	Rodeo Drive Committee Meeting	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	Board of Directors for the Rodeo Drive Committee
9.11.19 PLE 1	Westside Central Service Council	Purple Line Extension Update	Westside Central Service Council and public
9.11.19, 1.8.19 2.5.19, 3.5.19	Wilshire Rodeo Stakeholders	Update on construction status, milestones reached, look ahead	Beverly Hills Business Owners within the

Dates & Sections	Meeting Name	Meeting Topic	Invitees
4.2.19, 5.1.19 6.4.19, 7.17.19 8.14.19, 10.15.19 11.13.19, 1.9.18 11.14.18, 12.13.18 PLE 2	Briefing	schedule, construction mitigation programs address public's questions.	vicinity of the Wilshire Rodeo Station construction zone
11.13.19, 2.26.20 PLE 3	Westwood Hills Community Meeting	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	Businesses, residents and stakeholders along the project alignment and LA County residents
1.8.20, 2.5.20 3.4.20, 4.8.20 5.6.20, 6.3.20 7.1.20, 12.9.20 5.1.19, 8.14.19 10.15.19 PLE 2	Beverly Hills Wilshire Rodeo Stakeholder Briefing	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs and address public questions.	Beverly Hills Business Owners within the vicinity of the Wilshire Rodeo Station construction zone

1.8.20, 4.1.20 5.6.20, 8.5.20 7.14.21, 8.4.21 11.3.21, 2.2.22 5.4.22, 8.3.22 11.2.22, 2.1.23 5.3.23, 8.2.23 11.1.23, 2.7.24 5.1.24, 8.7.24 10.9.24, 1.8.25 4.2.25, 5.3.25 All Sections	Webinar Community Meeting	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	Businesses, residents and stakeholders along the project alignment in the City of Beverly Hills and LA County residents
2.5.20 PLE 3	National Home for Disabled Volunteer Soldiers	Businesses, residents and stakeholders along the project alignment and LA County residents Project Update	Veterans and interest groups
2.20.20, 5.21.20 Section 2	Community Meeting	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	Businesses, residents and stakeholders in the City of Beverly Hills and LA County residents
3.19.20, 11.12.20 11.14.19 PLE 3	Community Meeting	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	Businesses, residents and stakeholders along the project alignment and LA County residents
3.31.20 PLE 2 &3	Elected Officials Briefing	Update on the status of the project and look ahead schedule	Elected offices within project's limits.

Dates & Sections	Meeting Name	Meeting Topic	Invitees
4.14.21 PLE 1 & 2	Westside Central Service Council	Sections 1 and 2 Update	Westside Central Service Council and public
3.9.22 PLE 3	Westside Central Service Council	Section 3 Update	Westside Central Service Council and public
9.1.23 PLE 2	Westside Central Service Council	Section 2 Station Names	Westside Central Service Council and public

7.6.22, 9.7.22 10.12.22, 12.7.22 3.1.23, 6.7.23 7.12.23, 9.6.23 10.4.23, 12.3.23 3.6.24, 6.5.24 9.18.24, 12.4.24 7.10.24, 3.12.25 1.10.25, 7.1.20 1.13.21, 6.2.21 9.1.21, 10.6.21 12.1.21, 1.5.22 3.9.22, 4.6.22 6.1.22, 1.4.23 4.12.23, 4.3.24 11.6.24, 2.5.25 5.7.25, 2.5.20 PLE 2	City of Beverly Hills Stations Community Meeting	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	Businesses, residents and stakeholders in the City of Beverly Hills and LA County residents
2.8.24	Westside Central Service Council	Purple Line Extension Update	Westside Central Service Council and public
3.1.24 PLE 1	Variety of Meetings; Construction Relations team publicized work that closes Wilshire Bl by: notifying the City of LA Board of Public Works, distributing thousands of doorto-door by vendors Online presentations given to stakeholder.	Removal of Temporary Decking in Wilshire/Western Intersection Construction Notices (including detours and maps describing the work area)	Council Districts, Neighborhood Councils, local elected officials, neighbors, transit riders, and drivers, neighboring stakeholders within one-half mile of the affected intersection.
3.11.24	VA Construction	C1152 VA Construction Oversight Tour	Section 3 VA Station

Dates & Sections	Meeting Name	Meeting Topic	Invitees
PLE 3	Coordination	- Park and Walk with VA	Lead, VA Operations
3.26.24 PLE 3	VA Construction Coordination	Future VA Station Construction: Plaza and Pedestrian Bridge	VA Station Leads, Bus Operations

4.3.24 PLE 3	VA Construction Coordination	Dowlen Drive Pre-Construction Site Walk	VA Station Project Leads, VA Operations Director
4.3.24 PLE 3	Westwood Village Improvements Association	Construction mitigation and promotion of project's benefits with Delivery of pre-loaded TAP to Westwood Village Improvement Association	To Westwood Village Improvement Association members
4.11.24 PLE 3	VA Station Pedestrian Bridge/Plaza VA Construction Coordination	Briefing on the decommissioning of the VA mural wall to accommodate PLE station construction.	VA management
4.23.24, 8.13.24 PLE 3	Construction Update Meeting	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	Businesses, residents and stakeholders along the project alignment and LA County residents
4.26.24 PLE 3	VA Hospital Director	How to better support stakeholder needs in weekly alerts, mitigations applied to current and future issues, enhance understanding of stakeholder's project perspective and experience.	Deputy Executive Officer and VA Director
4.29.24 PLE 3	VA Station North Plaza/Pedestrian Bridge Construction	Plans for beginning construction of the VA Station's North Plaza and Pedestrian Bridge, confirm demolition plans	Metro Art, New Media Team
5.2.24 PLE 3	Construction Coordination: Hammer Museum's Gala in the Garden	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	Project Execs, Station Leads, Hammer Museum Director
5.3.24 PLE 3	VA Station Pedestrian Bridge/Plaza/Veterans Mural	Discuss plans to hold a private (nonmedia) ceremony West LA VA Medical Center campus for decommissioning part of the Veteran's Mural. Outline mitigation plans for addressing anticipated opposition from some Veterans groups who have expressed concerns about project construction impact on the mural.	Community Relations

5.6.24 PLE 3	VA Lot 43 Construction	Meeting to discuss upcoming work for Parking Lot 43N	VA Facilities Director
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Dates & Sections	Meeting Name	Meeting Topic	Invitees
	Coordination & Phasing		
5.7.24 PLE 3	Santa Monica Big Blue Bus Access Coordination	Discuss issue of Santa Monica Big Blue Buses not being able to turn left into the VA campus when heading Westbound coming from the 405	Bus Operations, Santa Monica Big Blue Bus, Community Relations
5.8.24 PLE 3	Banner Request-VA Art Wall Demolition Event	Discuss the outcome of the 5/6 meeting to determine the necessary next steps for banner production for the VA art wall demolition.	Metro Art, Community Relations
5.10.24 PLE 3	VA Memorial Mural Coordination	Memorialization of existing Veteran's artwork	Veterans Community
5.13.24 PLE 3	VA Artwork Coordination	VA Hospital Station North Plaza Artwork Redesign	Metro Art, Community Relations
5.20.24 PLE 3	Westwood Village Improvement Association	Further discuss the Metro's commitment to Westwood Village for FY 24/25.	Westwood Village Improvement Association
5.30.24 PLE 3	Century City Mall Construction Coordination	Discuss potential impacts the cone penetration testing closures will have on the driveways of the Westfield Century City Mall.	Contractor, Property Manager of Century City Mall
6.26.24 PLE 3	Veterans Community Oversight and Engagement Board Meeting	Coordination on Art Department activities	VCOEB, Metro Art, Project Execs
7.3.24, 8.6.24 PLE 3	VA Campus Construction Coordination	This meeting is to help coordinate rerouting and relocation of impacted bus lines due to work on the VA campus.	SMBBB, Metro Bus Operations, Third Party, Contractor
7.16.24 PLE 3	10900 Wilshire Bl Construction Coordination	Briefing on arrangements being made and current status on behalf of Tishman Speyer to enable removal and Storage to be completed	10900 Property Manager, Project Execs
7.17.24 PLE 3	Veterans Advisory Commission Meeting	Metro Art update on the Westwood/VA Hospital Station Art Program.	Metro Art, Community Relations

8.15.24 PLE 3	Century City Farmers Market 20th Anniversary	Public outreach on the project's benefits and current status, sign up for updates.	Century City residents.
9.17.24 PLE 3	CPT Testing On Wilshire Bl. Near Veteran Av.	This is a meeting to discuss the extent of the CPT testing closure and an overview on what CPT testing entails.	Federal Rep for GSA, Contractor
10.3.24 PLE 3	UCLA Sustainable Transportation Fair	Update on construction status, milestones reached, look ahead schedule, construction mitigation	Open to members only.

Dates & Sections	Meeting Name	Meeting Topic	Invitees
		programs, address questions from the public, signup to receive project updates.	
10.21.24 PLE 3	AARP event planning session	Prep of outreach at Veteran/AARP event, to promote the project's benefits, provide an overview on the status of the project, and answer questions from attendees.	Streets for All, AARP, WWVIA
10.28.24 PLE 3	CD11 Holiday Moratorium Exemption Review	Review Holiday Moratorium Exemption for CD11	CD11, Contractor
12.19.24 PLE 3	Westwood Improvement Association	Tour of Westwood Broxton Plaza to discuss potential operational conflicts with construction, project benefits and timeline.	Westwood Improvement Association management
1.10.25 PLE 3	LA Fire Coordination with VA	Emergency coordination for VA Evacuation from Palisades Fire	VA management
1.30.25 PLE 3	Hammer Museum 2/8 Exhibition TC Discussion	Discussion to coordinate local closures with access to event	Contractor, Station leads
2.5.25 All 3 Sections	Lunch and Learn Community Meeting	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	Businesses, residents and stakeholders along the project alignment and LA County residents.
2.11.25, 3.5.25 PLE 3	City of LA Board of Public Works	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs, outreach & engagement efforts and address questions.	Public and constituents of the City of Los Angeles

2.20.25 PLE 3	Westwood Village Improvement Association Board of Directors Meeting	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	WVIA members
3.4.25 PLE 2	Century Plaza Towers Tenant Mtg	Provided update on current and upcoming Construction in Century City	Tenants at 2029/2049 Century Park East
3.5.25 PLE 3	North Westwood Neighborhood Council Meeting	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs and address questions.	Board members and public.
3.27.25 PLE 3	Upcoming Work in Century City	Review upcoming work activities by PLE3 in the Century City area. Traffic control plans will be reviewed.	Contractor, Century City Mall Property Manager
4.2.25	CD11 City of LA for	Update on construction status,	CD11, Contractor

Dates & Sections	Meeting Name	Meeting Topic	Invitees
PLE 3	Peak Hour Exemption	milestones reached, look ahead schedule, construction mitigation, and why extended work hours are necessary.	
4.10.25 PLE 3	VA Construction coordination	Spill reported by VA at TTES, coordination of field activities	Tunnels, VA staff
4.11.25 PLE 3	VA Construction Mitigation coordination	Review of VA Hospital Shuttle Map	VA staff, Metro Art and Design
4.15.25, 2.19.19 5.1.19, 7.30.19 11.14.19, 2.21.18 4.26.18, 8.15.18 11.14.18, 2.19.19 5.1.19, 7.30.19 11.14.19, 3.26.24 PLE 2	Century City Property Managers Construction Briefing	Update on construction status, milestones reached, look ahead schedule, construction mitigation programs address public's questions.	Property Managers and Staff
5.1.25 PLE 3	UCLA First Thursdays	Share information on the benefits of the project and status of construction, answered questions and signed up the public to receive project updates.	UCLA students and administration, members of the public
5.6.25 PLE 3	NDVets Resource Fair	Share information on the benefits of the project and status of construction, answered questions and signed up the public to receive project updates.	Veteran's community, members of the public

8.29.25, 9.12.24 PLE 3	UCLA Construction Coordination	Discussion Regarding Adjusted Closure Schedules for UCLA Move In	UCLA, Project Execs
9.24.25 PLE 3	Bus Route coordination with Santa Monica Big Blue Bus	Discussion regarding N. Plaza Drilling Work Closures Impacting Bus Line	SMBBB, Third Party, Contractor

ATTACHMENT H

**Title VI Proposed Fare Restructuring
Fare Equity Analysis**

**Los Angeles County Metropolitan Transportation Authority
Recipient ID 5566
December 2022**

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1.INTRODUCTION

Title VI of the Civil Rights Act of 1964 is a Federal statute and provides that no person 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.

Federal Transit Administration (FTA) is responsible for ensuring that recipients of Federal funds 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 the United States Department of Transportation Title VI requirements. As a recipient of federal funds, LA Metro is required to evaluate service and fare changes under Chapter IV of the Title VI Circular.

2. REGULATORY SETTING

2.1 FTA Circular 4702.1B Chapter IV

Title 49 CFR Section 21.5 (b)(2) specifies that a recipient shall not “utilize criteria or methods of administration which have the effect of subjecting persons to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program with respect to individuals of a particular race, color, or national origin.” Section 21.5 (b)(2) requires recipients to “take affirmative action to assure that no person is excluded from participation in or denied the benefits of the program or activity on the grounds of race, color, or national origin.”

Transit providers that operate 50 or more fixed route vehicles in peak service and are located in an urbanized area (UZA) of 200,000 or more in population, are required to meet all requirements of Chapter IV of the Circular (i.e., setting service standards and policies, collecting and reporting data, monitoring transit service, and evaluating fare and service changes).

2.2 Metro Title VI Program Update

Metro’s Board approved Title VI Program Update in compliance with Title 49 CFR Section 21.9 (b) and with the FTA Circular 4702.1B “Title VI Requirements and Guidelines for Federal Transit Administration Recipients,” issued in October 2012. The purpose of the Title VI Program Update is to document the steps Metro has taken and will take to ensure Metro provides services without excluding or discriminating against individuals on the basis of race, color, and national origin.

The Title VI Program Update provides an outline of Metro’s Title VI policies including what constitutes a major service change, the disparate impact, and disproportionate burden policy. The Title VI Program Update also includes the general requirements for

Title VI and the requirements for fixed route transit providers. The latest Title VI Program Update was approved by the Board in September 2022 and submitted to FTA by the due date of October 1, 2022, as outlined in the Title VI Program Update.¹

2.4 Definitions

The following terms are used in this document:

Disparate Impact: 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. For 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%) per Metro's Board approved Disparate Impact Policy.

Disproportionate Burden: Disproportionate burden refers to a neutral policy or practice that disproportionately affects low-income populations and/or low-income riders more than non-low-income populations and/or riders. A finding of disproportionate burden for major service and fare changes requires Metro to evaluate alternatives and mitigate burdens where practicable. For fare changes, a disproportionate burden will be deemed to exist if an absolute difference between the percentage of low-income adversely affected by the service change and the overall percentage of low-income persons is at least five percent (5%) per Metro's Board approved Disproportionate Burden Policy.

Low Income: Metro defines low-income riders or populations as anyone making below \$59,550 which represents the median income of a four-person household in Los Angeles County.²

3. METHODOLOGY APPROACH

Metro 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 live and work within the 1,433-square-mile service area.³ Collectively, Metro operates multiple rail and bus lines which consists of over 50 rail vehicles in a UZA over 200,000 in population. Metro operates its service without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964, as amended.

¹ Los Angeles County Metropolitan Transportation Authority, Title VI Program Update, October 2022

² Los Angeles County Metropolitan Transportation Authority, Title VI Program Update, October 2022

³ Los Angeles County Metropolitan Transportation Authority, Title VI Program Update, October 2022

As Metro serves the core of Los Angeles County’s population, and this analysis focuses on the population falling within the borders of Los Angeles County. County data was used to evaluate Metro’s Service Area for this evaluation. Ridership data was compiled using 2022 Customer Survey race/ethnicity and income demographic data.

For the purpose of this analyses the following demographics were used as the service area minority and low income population shares (Table 3-1):

Table 3-1 Metro Service Area Demographic Breakdown

Metro Service Area				
Total Population	Minority Population	Percent Minority	Low-Income Population	Percent Low-Income
10,105,722	7,428,740	73.5%	2,122,201	20.9%

4. PROPOSED FARE RESTRUCTURING

Overview

Metro staff is proposing a revised fare structure. Because the revised fare structure includes changes in fare pricing, a fare change impact analysis is required. The purpose of this analysis is to determine if the fare changes will create disparate impacts for minority passengers or a disproportionate burden on low income passengers.

Implementation of Fare Capping

The proposed fare restructuring includes implementation of fare capping—an equitable, pay-as-you-go fare payment model that ensures customers only pay for the rides they take and never overpay. Customers would no longer have to pay for the upfront cost of a pass. Instead, they would load stored value onto a TAP card and pay per ride. With each paid ride in a day and week, customers will ride toward a daily and weekly dollar cap, after which they can ride free for the rest of that time period.

With fare capping, the Metro 1-Day, 7-Day, and 30-Day passes are no longer necessary and will not be offered. This will relieve riders of the financial burden of prepaying for a pass while still offering access to earning unlimited free rides.

Public Outreach Summary:

Metro conducted public outreach as listed below, as well as communication with Limited English Proficient (LEP) communities:

- Public Notice Released: 10/12/22
- Virtual Public Hearing: 11/14/22 at 5pm

Marketing campaign to inform Metro Riders of the upcoming Public Hearing on proposed fare capping and fare changes:

- Take one
- Fare capping web ad under rider news
- The Source Post
- Landing Page on Metro.net with fare capping information and FAQ
- Newspaper ads promoting the Public Hearing
- Social media graphics
- Internal factsheet/FAQ
- Email to TAP users, stakeholders, LIFE, Metro email list
- Bus and rail cards
- Internal daily brief email to Metro employees
- Union Station east portal ticker
- Email address for public hearing
- E-blast for public hearing
- LED Banner Message on TVMs

Scheduled Meetings with Service Councils, Advocacy Groups, and other Advisory Groups

- October 10 5pm San Gabriel Valley Service Council
- October 11 10am LIFE Program Administrators Briefing
- October 12 6pm Westside Central Service Council
- October 13 1:30pm TAP Operating Group
- October 13 2pm Gateway Cities Service Council
- October 18 6pm Budget Telephone Town Hall
- October 19 10am General Managers
- October 20 9:30am Streets & Freeway Subcommittee
- October 21 9:30am South Bay Service Council
- November 2 6:30pm San Fernando Valley Service Council
- November 2 9:30am Technical Advisory Committee (TAC)
- November 9 10:45am On the Move Riders Program
- November 9 1:30pm Local Transit Systems Subcommittee (LTSS)
- November 10 10:30am Accessibility Advisory Council (AAC)
- November 10 1:00pm Slate-Z (Advocacy Group)
- November 14 5pm Public Hearing
- November 15 9:30am Bus Operations Subcommittee (BOS)

Notice of Proposed Fare Change has been published in these LA County periodicals, to include the Limited English Proficient (LEP) communities, after October 14:

- Los Angeles Daily News
- Pasadena Star News
- L.A. Watts Times
- La Opinion
- Chinese Daily/World
- Rafu Shimpo (Japanese)
- Korea Times
- Asbarez Armenian Daily News
- Asian Journal Pub, Inc. (Tagalog)
- Panorama (Russian)

Metro's Board Approved Title VI Policies:

- A disparate 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 at least 5%
- 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 5%

Analysis and Results

Disparate Impact Analysis

Impacts of proposed fare changes to minority populations were analyzed by determining the percentage share of minority usage for each fare product with a proposed pricing change. In accordance with Metro's disparate impact policy described above, this percentage was compared to the overall/systemwide minority ridership as shown in the following table.

Rider Category & Fare Product	Adopted Pricing	Proposed Pricing	Price Increase/ (Decrease)	ANALYSIS OF MINORITY SHARE	
				% Minority	Difference from Overall Minority Share (88.7%)
Proposed Fare Products Decreasing in Cost					
Silver and Express - All Riders					
Zone Upcharge	\$0.75 per trip \$22 monthly	\$0.00	Eliminate Upcharge	90.7%	2.0%
Regular Fare					
Day Pass / Daily Cap	\$7.00	\$5.00	(\$2.00)	90.3%	1.6%
7-Day Pass / Weekly Cap	\$25.00	\$18.00	(\$7.00)	91.8%	3.1%
K-12 Student					
Day Pass / Daily Cap	\$7.00	\$2.50	(\$4.50)	90.3%	1.6%
College/Vocational Student					
Base Fare	\$1.75	\$1.00	(\$0.75)	94.3%	5.6%
Day Pass / Daily Cap	\$7.00	\$2.50	(\$4.50)	90.3%	1.6%
7-Day Pass / Weekly Cap	\$10.75*	\$6.00	(\$4.75)	93.4%	4.7%
Proposed Fare Products Increasing in Cost					
Senior/Disabled					
Base Fare - Off-Peak	\$0.35	\$0.75	\$0.40	78.2%	-10.5%
7-Day Pass / Weekly Cap	\$5.00*	\$6.00	\$1.00	84.6%	-4.1%

*Current adopted fare structure does not include weekly passes for S/D, K-12, or C/V. For comparison purposes, "Adopted Pricing" for these products is shown as the weekly equivalent of the 30-Day Pass price.

The difference between minorities affected exceeds the 5% threshold for two fare products; those differences are bolded in the last column in the table above and analyzed further in the text below:

- **College/Vocational Student Base Fare** – This group is slightly above the 5% threshold. However, the proposed pricing represents a decrease in cost of \$0.75. *Therefore, there is no disparate impact to minority riders in this category because there is no adverse effect to minorities from the proposed changes.*
- **Senior/Disabled Off-Peak Base Fare** – This group is also above the 5% threshold. However, this category is 10.5% **less** minority than overall ridership, meaning that fewer minorities would be affected by the change in comparison with the share of minorities systemwide. *Therefore, increasing the price does not result in a disparate impact to minority ridership.*

Disproportionate Burden Analysis

Impacts of proposed fare changes to low-income populations were analyzed by determining the percentage share of low-income usage for each fare product with a

proposed pricing change. In accordance with Metro’s disproportionate burden policy described above, this percentage was compared to the overall/systemwide low-income ridership as shown in the following table.

Rider Category & Fare Product	Adopted Pricing	Proposed Pricing	Price Increase/ (Decrease)	ANALYSIS OF LOW INCOME SHARE	
				% Low Income	Difference from Overall Low Income (76.2%)
Proposed Fare Products Decreasing in Cost					
Silver and Express - All Riders					
Zone Upcharge	\$0.75 per trip \$22 monthly	\$0.00	Eliminate Upcharge	58.3%	-17.9%
Regular Fare					
Day Pass / Daily Cap	\$7.00	\$5.00	(\$2.00)	80.6%	4.4%
7-Day Pass / Weekly Cap	\$25.00	\$18.00	(\$7.00)	77.9%	1.7%
K-12 Student					
Day Pass / Daily Cap	\$7.00	\$2.50	(\$4.50)	80.6%	4.4%
College/Vocational Student					
Base Fare	\$1.75	\$1.00	(\$0.75)	86.7%	10.5%
Day Pass / Daily Cap	\$7.00	\$2.50	(\$4.50)	80.6%	4.4%
7-Day Pass / Weekly Cap	\$10.75*	\$6.00	(\$4.75)	79.6%	3.4%
Proposed Fare Products Increasing in Cost					
Senior/Disabled					
Base Fare - Off-Peak	\$0.35	\$0.75	\$0.40	78.8%	2.6%
7-Day Pass / Weekly Cap	\$5.00*	\$6.00	\$1.00	82.6%	6.4%

*Current adopted fare structure does not include weekly passes for S/D, K-12, or C/V. For comparison purposes, "Adopted Pricing" for these products is shown as the weekly equivalent of the 30-Day Pass price.

The difference between low-income riders affected exceeds the 5% threshold for three fare products. Those differences are bolded in the last column in the table above and analyzed further in the text below:

- Zone Upcharge – This category exceeds the 5% threshold, with 17.9% fewer low-income riders riding Silver Line and Express Bus than the systemwide average. Therefore, decreasing the cost to these riders by removing the upcharge represents a benefit to current riders that are less low-income than Metro’s overall ridership. However, *given that decreasing the price of these higher-cost services improves affordability of these services for low-income riders, this is not a disproportionate burden to Metro’s low-income ridership.*
- College/Vocational Student Base Fare – This category exceeds the 5% threshold, with more low-income riders using this product than low-income riders systemwide. However, the proposed pricing represents a decrease in cost of \$0.75. Therefore, *there is no disproportionate burden to these riders since the proposed change represents a fare decrease.*
- Senior/Disabled 7-Day Pass / Weekly Cap – This group is slightly above the 5% threshold, with 6.4% more low-income riders than the systemwide low-income ridership. Therefore, *there is a disproportionate burden for low-income Senior/Disabled riders using the Weekly Cap under fare capping.*

Conclusion

The proposed fare changes do not result in a disparate impact to minority riders. However, it does have disproportionate burden to low-income riders, for the Senior/Disabled Weekly Cap, which exceeds the 5% threshold for disproportionate burden.

Staff recommends Board approval pricing changes with the following proposed mitigation efforts to minimize the disproportionate burden for the Senior/Disabled Weekly Cap:

- Implementation of fare capping – Fare capping removes the need for all riders to prepay for a pass, which is a mitigating factor for affordability.
- Expansion of outreach to low-income Senior/Disabled riders – Metro will expand outreach to low-income Senior/Disabled riders to explain the benefits of fare capping and to increase enrollment in LIFE, Metro's regional low-income fare program. Senior/Disabled riders who enroll in LIFE will receive 20 free trips, decreasing overall transportation costs and further mitigating the impact of the modest proposed price increase from \$5 weekly to \$6 weekly.

ATTACHMENT I



U.S. Department
of Transportation
**Federal Transit
Administration**

Headquarters

East Building, 5th Floor – TCR
1200 New Jersey Avenue SE
Washington, DC 20590

August 2, 2024

Stephanie N. Wiggins
Chief Executive Officer
Los Angeles County Metropolitan Transportation Authority (LA Metro)
One Gateway Plaza
Los Angeles, CA 90012

Re: FTA Title VI Fare Equity Analysis Extension – Recipient ID No. 5566

Dear Ms. Wiggins:

This correspondence is to confirm receipt and approval of LA Metro's request for a waiver from the requirement to conduct a fare equity analysis after implementing the Mobility Wallet pilot program for six months, as outlined in the Federal Transit Administration (FTA) Title VI Circular 4702.1B, Chapter 4, Section 7(b). This waiver grants LA Metro an extension to conduct the fare equity analysis after Phase II of the pilot program. This extension is granted until the completion of Phase II, scheduled to conclude in Fall 2025; however, it only applies to the Mobility Wallet pilot program and activities identified in the request.

As described to FTA, LA Metro, in partnership with the Los Angeles Department of Transportation (LADOT), is implementing the Mobility Wallet pilot program to explore Universal Basic Mobility (UBM). The program provides low-income participants with a prepaid debit card loaded with \$150 per month for transportation expenses over a 12-month period. Phase I, which began in April 2023 and concluded in April 2024, includes 1,000 participants from targeted South Los Angeles zip codes. Phase II, scheduled to launch in Fall 2024, will expand to include an additional 2,000 participants as the program scales countywide.

LA Metro will use this extended period to gather comprehensive demographic and ridership data, analyze the impact on access to opportunity for low-income residents, and evaluate the potential for expansion of Mobility Wallets in Los Angeles County. LA Metro states that more time is needed to conduct a detailed assessment of data, address stakeholder questions, and thoroughly evaluate the impacts of the program.

LA Metro confirms it will conduct a fare equity analysis as required by FTA Circular 4702.1B. LA Metro will report to its Board regarding the impacts of the Mobility Wallet pilot following the completion of Phase II. FTA will not grant additional waivers or extensions under current circumstances.

Please notify FTA if there is a change regarding the information described in your request, as additional civil rights reporting or requirements may then be applicable. A copy of the email requesting the waiver and this letter will be uploaded to your TrAMS recipient profile.

We remind LA Metro that it should monitor the implementation of the pilot program, including specifically analyzing the demographics of the participants selected, to ensure policies and practices do not result in disparate impacts on the basis of race, color, or national origin.

As always, the FTA Office of Civil Rights is available to offer support or technical assistance. If you have any questions, please contact Regional Civil Rights Officer Karin Vosgueritchian via email at karin.vosgueritchian@dot.gov or at (415) 734-9475.

Sincerely,

A handwritten signature in black ink that reads "Dawn Sweet". The signature is written in a cursive, slightly slanted style.

Dawn Sweet
Director, Civil Rights Policy & Engagement
FTA Office of Civil Rights

cc: Ray Tellis, Administrator, FTA Region 9

ATTACHMENT J

Agenda

Wednesday, May 7, 2025
6:30PM

San Fernando Valley Service Council Regular Meeting

Marvin Braude San Fernando Valley Constituent Center
6280 Van Nuys Bl
Van Nuys, CA 91401

Participate by Zoom:

Online: <https://www.zoomgov.com/j/1619035092>

By phone: Dial 669 254 5252 or 833 568 8864 (Toll Free)

Webinar ID: 161 903 5092

In the event of an audio or video stream outage during the meeting, call or text 213.598.9715 and staff will work to address the issue.

All Metro in-person meetings are held in ADA accessible facilities. Meeting location served by Metro Lines 164, 233, 237, 761, LADOT Panorama City/Van Nuys DASH, LADOT Van Nuys/Studio City DASH

Call to Order

Council Members:

Louis Herrera, Chair
Antoinette Scully, Vice Chair
Perri Sloane Goodman
Erin N. Nash
David Perry
David Ramirez
Myung-Soo Seok
Rudy Trujillo
Dennis Washburn

Officers:

Wayne Wassell, Service Planning Director
Dolores Ramos, Service Councils Senior Manager
Israel Marin, Transportation Planning Manager
Stephanie Molen, Community Relations Manager
Kari Solum, Administrative Analyst
Diego Quijada, Transportation Associate

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Limited English Proficiency: Upon request, interpreters are available to the public for Metro sponsored meetings and events. Agendas and minutes will also be made available in other languages upon request.

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x8 Հայերէն (Armenian)



Metro

Los Angeles County
Metropolitan Transportation Authority

Service Council Decorum Policy

- A. Requests to Address the Service Council on Agenda Items. All requests, from members of the public, to address the Council on either agenda or non-agenda items shall be submitted to the Service Council staff in writing. Requests to speak shall be taken in the order received. The Service Council shall reserve the right to limit redundant or repetitive public comment.
- B. Addressing the Service Council. No person shall address the Service Council until he/she has first been recognized by the Chair. All persons addressing the Service Council shall give their name for the purpose of the record.
- C. Removal from the Service Council Meeting Room. At the discretion of the Chair or upon vote of the Service Council, the Chair may order removed (or censure a speaker) from the meeting any person who commits any of the following acts of disruptive conduct in respect to a regular, adjourned regular or special meeting of the Service Council:
1. Disorderly, contemptuous or insolent behavior toward the governing board or any member thereof, or staff member, or member of the public which disrupts, disturbs, or otherwise impedes the orderly conduct of the meeting;
 2. A breach of the peace, boisterous conduct or violent disturbance, which disrupts, disturbs, or otherwise impedes the orderly conduct of the meeting;
 3. Disobedience of any order of the Chair, which shall include an order to be seated or to refrain from addressing the Service Council or staff member; and/or,
 4. Any other interference with the due and orderly course of said meeting. Any person so removed shall be excluded from further attendance at the meeting from which he/she has been removed, unless permission to attend is granted by a motion adopted by a majority vote of the Service Council, and such exclusion shall be executed by the Sergeant-at-Arms, or designee, upon being so directed by the Chair. It is at the discretion of the Service Council to allow the individual to remain at the meeting after censure. The motion to censure may, at the Chair's direction, also include a prohibition from further public comment at the meeting, except as in writing and in accordance with the spirit of this policy, submitted to the Service Council staff for consideration and inclusion in the record.
- D. Sergeant-at-Arms – The Sergeant-at-Arms duties shall be performed by the designated ranking Metro Security personnel, or sworn law enforcement personnel, as directed by the Chair, and in attendance at the meeting. In the absence of sworn personnel to act as the Sergeant-at-Arms, the Chair may direct that all public comment from a censured individual be received in writing. Said censure shall remain in effect until the next regularly scheduled Service Council meeting.

Adopted February 1, 2017

Submit comments before the meeting:

- Via email servicecouncils@metro.net
- By postal mail: Regional Service Councils, One Gateway Plaza, MS: 99-7-1, Los Angeles, CA 90012. Indicate the meeting name, date, and agenda item number when submitting. *Email and postal mail comments must be received by 5 pm the day prior to the meeting to ensure they will be read into the public record during the meeting. Comments received via mail or email will be read for up to two minutes per person, per item.*

During the meeting:

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- Via Zoom:
 - Click **RAISE HAND** in your meeting controls or **PRESS *9** on the phone line.
 - To lower your hand, click **RAISE HAND** in your meeting controls.
 - Press ***6** to unmute your phone line when called on for comment.

1. ROLL Call
2. APPROVE Minutes of April 2, 2025 Meeting, Councilmembers
3. RECEIVE Title VI Service and Fare Equity Policies Overview, Joanna Lemus, Senior Manager, Civil Rights Programs Comment
4. RECEIVE Station Experience Quarterly Update, Blanca Buenrostro, Facilities Maintenance Supervisor, Jorge Martinez, Principal Transportation Planner Handout Comment
5. RECEIVE Regional Updates, Wayne Wassell, Service Planning Director, Stephanie Molen, Community Relations Manager Service Performance Handout Comment
6. RECEIVE Public comment for items not on the agenda Comment
7. CHAIR and Council Member Comments
Consideration of items not on the posted agenda, including: items to be presented and (if requested) referred to staff; items to be placed on the agenda for action at a future meeting of the Council; and/or items requiring immediate action because of an emergency situation or where the need to take immediate action came to the attention of the Council subsequent to the posting of the agenda.

ADJOURNMENT

Receive San Fernando Valley Service Council updates: servicecouncils@metro.net or 213.922.1282.

Agenda

Gateway Cities Service Council

Regular Meeting

Thursday, May 8, 2025
5:00PM

Salt Lake Park Community Center Lounge
3401 E Florence Av
Huntington Park, CA 90255

Participate online or by phone:

Online: <https://www.zoomgov.com/j/1619425022>

By phone: Dial 669 254 5252 or 833 568 8864 (Toll Free)

Webinar ID: 161 942 5022

In the event of an audio or video stream outage during the meeting, email servicecouncils@metro.net or text 213.598.9715 so staff can address the issue.

All Metro meetings are held in ADA accessible facilities. Meeting location served by Metro Lines 111 and 251.

Call to Order

Council Members:

Juan Muñoz Guevara, Chair

Raul Añorve, Vice Chair

Maria Davila

Jesse Flores

Danny Horn

Karina Macias

Priscila Papias

Samuel Peña

Mary Zendejas

Officers:

Wayne Wassell, Service Planning Director

Dolores Ramos, Service Councils Senior Manager

Monica Waggoner, Transportation Planning

Manager

Kari Solum, Administrative Analyst

Diego Quijada, Transportation Associate

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x4 한국어 (Korean) x7 русский (Russian)

x8 Հայերէն (Armenian)



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Los Angeles County
Metropolitan Transportation Authority

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- Via email servicecouncils@metro.net
- By postal mail: Regional Service Councils, One Gateway Plaza, MS: 99-7-1, Los Angeles, CA 90012. *Indicate the meeting name, date, and agenda item number when submitting. Email and postal mail comments must be received by 5 pm the day prior to the meeting to ensure they will be read into the public record during the meeting. Comments received via mail or email will be read for up to two minutes per person, per item.*

During the meeting:

- Click on comment link for item you wish to comment on in agenda below
- **Via Zoom:**
 - Click **RAISE HAND** in your meeting controls or **PRESS *9** on the phone line.
 - To lower your hand, click **RAISE HAND** in your meeting controls.
 - Press ***6** to unmute your phone line when called on for comment.

1. ROLL Call
2. APPROVE Minutes from April 10, 2025 Meeting, Councilmembers
3. RECEIVE Title VI Service and Fare Equity Policies Overview, Joanna Lemus, Senior Manager, Civil Rights Programs Comment
4. RECEIVE Station Experience Quarterly Update, Blanca Buenrostro, Facilities Maintenance Supervisor, Jorge Martinez, Principal Transportation Planner Comment
5. RECEIVE Line Ride Report, Vice Chair Añorve Comment
6. RECEIVE Regional Updates, Monica Waggoner, Transportation Planning Manager, Wayne Wassell, Service Planning Director, Service Performance Handout Comment
7. RECEIVE Public comment for items not on the Agenda Comment
8. CHAIR and Council Member Comments
Consideration of items not on the posted agenda, including: items to be presented and (if requested) referred to staff; items to be placed on the agenda for action at a future meeting of the Council; and/or items requiring immediate action because of an emergency situation or where the need to take immediate action came to the attention of the Council subsequent to the posting of the agenda.

ADJOURNMENT

Receive Gateway Cities Service Council updates: servicecouncils@metro.net or 213.922.1282.

Agenda

South Bay Cities Service Council Regular Meeting

Friday, May 9, 2025

9:30 AM

Residence Inn Conference Room
2420 Marine Av
Redondo Beach, CA 90278

Participate online or by phone:

Online: <https://www.zoomgov.com/j/1601341255>

By phone: Dial (669) 254 5252 or (833) 568 8864 (Toll Free)

Webinar ID: 160 134 1255

In the event of an audio or video stream outage during the meeting, call or text 213.598.9715 so staff can address the issue.

All Metro in-person meetings are held in ADA accessible facilities. Meeting location served by Metro C Line (Redondo Beach Station), Metro Line215 (rush hours only), and GTrans 1X.

Call to Order	
Council Members: Don Szerlip, Chair David Mach, Vice Chair Ernie Crespo Jon Kaji Roye Love Rochelle Mackabee Courtney Alicia Miles Melissa Molina Bob Wolfe	Officers: Dolores Ramos, Service Councils Senior Manager Joe Forgiarini, Senior Executive Officer Matt Lazo, Transportation Planning Manager Andy Sywak, Community Relations Manager Kari Solum, Administrative Analyst Diego Quijada, Transportation Associate

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Los Angeles County
Metropolitan Transportation Authority

Submit comments before the meeting:

- Via email servicecouncils@metro.net
- By postal mail: Regional Service Councils, One Gateway Plaza, MS: 99-7-1, Los Angeles, CA 90012. *Indicate the meeting name, date, and agenda item number when submitting. Email and postal mail comments must be received by 5 pm the day prior to the meeting to ensure they will be read into the public record during the meeting. Comments received via mail or email will be read for up to two minutes per person, per item.*

During the meeting:

- Click on comment link for item you wish to comment on in agenda below
- Via Zoom:
 - Click **RAISE HAND** in your meeting controls or **PRESS *9** on the phone line.
 - To lower your hand, click **RAISE HAND** in your meeting controls.
 - Press ***6** to unmute your phone line when called on for comment.

Approximate times for item discussion listed; actual times and duration of discussion vary.

1. ROLL Call
2. SAFETY Tip
3. APPROVE Minutes from April 11, 2025 Meeting, Councilmembers
4. RECEIVE Title VI Service and Fare Equity Policies Overview, Joanna Lemus, Senior Manager, Civil Rights Programs (9:35 a.m.) Comment
5. RECEIVE Station Experience Quarterly Update, Blanca Buenrostro, Facilities Maintenance Supervisor, Jorge Martinez, Principal Transportation Planner (10:15 a.m.) Handout
Comment
6. RECEIVE Regional Updates, Joe Forgiarini, Senior Executive Officer, Service Planning, Andy Sywak, Community Relations Manager (10:45 a.m.) Service Performance Handout
Comment
7. Council Member Comments and Line Rides (11:05 a.m.)
Consideration of items not on the posted agenda, including: items to be presented and (if requested) referred to staff; items to be placed on the agenda for action at a future meeting of the Council; and/or items requiring immediate action because of an emergency situation or where the need to take immediate action came to the attention of the Council subsequent to the posting of the agenda.
8. RECEIVE Public comments for items not on the Agenda (11:30 a.m.) Comment

ADJOURNMENT

Subscribe to South Bay Service Council updates: servicecouncils@metro.net or 213.922.1282.

Agenda

San Gabriel Valley Service Council

Regular Meeting

Monday, May 12, 2025
5:00 PM

Metro El Monte Division 9 Building
Third Floor Service Council Conference Room
3449 Santa Anita Av (Santa Anita Av & Ramona Bl)
El Monte, CA 91731

Participate online or by phone:

Online: <https://www.zoomgov.com/j/1610384351>

By phone: Dial 669 254 5252 or 833 568 8864 (Toll Free) and enter Webinar ID: 161 038 4351

In the event of an audio or video stream outage during the meeting, call or text 213.598.9715 and staff will work to address the issue.

All Metro in-person meetings are held in ADA accessible facilities. Meeting location served by Metro Bus (70, 76, 267, 268, 287, 577, & J Line), Metro Micro (El Monte), Foothill Transit (178, 190, 194, 269, 270, 282, 486, 488, 492, & Silver Streak), Norwalk Transit 7, and El Monte Shuttle Lines serving El Monte Station.

Call to Order

Council Members:

Salvador Melendez, Chair
Roberto Álvarez, Vice Chair (virtual - just cause AB 2449)
Ed Chen
Gabriela Eddy
Gary Floyd
Alex Gonzalez
Diane Velez
Ben Wong

Officers:

Dolores Ramos, Service Councils Senior Manager
Wayne Wassell, Service Planning Director
JC Montenegro, Community Relations Manager
Kari Solum, Administrative Analyst
Diego Quijada, Transportation Associate

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x8 Հայերեն (Armenian)



Los Angeles County
Metropolitan Transportation Authority

Metro

Submit comments before the meeting:

- Via email servicecouncils@metro.net
- By postal mail: Regional Service Councils, One Gateway Plaza, MS: 99-7-1, Los Angeles, CA 90012. Indicate the meeting name, date, and agenda item number when submitting. *Email and postal mail comments must be received by 5 pm the day prior to the meeting to ensure they will be read into the public record during the meeting. Comments received via mail or email will be read for up to two minutes per person, per item.*

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 - To lower your hand, click **RAISE HAND** in your meeting controls.
 - Press ***6** to unmute your phone line when called on for comment.

1. ROLL Call
2. APPROVE Minutes from April 14, 2025, Councilmembers
3. RECEIVE Title VI Service and Fare Equity Policies Overview, Joanna Lemus, Senior Manager, Civil Rights Programs Comment
4. RECEIVE Station Experience Quarterly Update, Blanca Buenrostro, Facilities Maintenance Supervisor, Jorge Martinez, Principal Transportation Planner Handout Comment
5. RECEIVE Regional Updates, Wayne Wassell, Service Planning Director, JC Montenegro, Community Relations Manager Service Performance Handout Comment
6. RECEIVE Public comments for items not on the Agenda Comment
Members of the public may address the Council for up to 2 minutes per item, or at the discretion of the Chair.
7. CLOSING Remarks, Council Members and Staff
Consideration of items not on the posted agenda, including: items to be presented and (if requested) referred to staff; items to be placed on the agenda for action at a future meeting of the Council; and/or items requiring immediate action because of an emergency situation or where the need to take immediate action came to the attention of the Council subsequent to the posting of the agenda.

ADJOURNMENT

Receive San Gabriel Valley Service Council updates: servicecouncils@metro.net or 213.922.1282.

Agenda

Westside/Central Service Council

Regular Meeting

Wednesday, May 14, 2025
6:00PM

Metro Headquarters Building
1 Gateway Plaza
3rd Floor Board Room
Los Angeles, CA 90012

Participate online or by phone:

Online: <https://www.zoomgov.com/j/1618562032>

By phone: Dial 669 254 5252 or 833 568 8864 (Toll Free) and enter Webinar ID: 161 856 2032

In the event of an audio or video stream outage during the meeting, call or text 213.598.9715 so staff can address the issue

All Metro in-person meetings are held in ADA accessible facilities. Meeting location served by Metro Rail A, B, and D Lines; Metro Lines 28, 33, 40, 70, 76, 78, 106, 487, 489, and Metro J Line 910/950. Also served by Antelope Valley Transit, City of Commerce, Foothill Transit, LADOT DASH D, Commuter Express Union Station/Bunker Hill Shuttle, Metrolink, Torrance Transit, and Santa Clarita Transit.

Call to Order

Council Representatives:

Dan Wentzel, Chair
Thomas Praderio, Vice Chair
Chelsea Byers
Martha Eros
David Feinberg
Ernesto Hidalgo
Steven King
Jennifer Nazario
Pamela Sparrow

Officers:

Dolores Ramos, Service Councils Senior Manager
Joe Forgiarini, Senior Executive Officer
Scott Greene, Senior Transportation Planning Manager
Nick Fox Robbins, Community Relations Manager
Kari Solum, Administrative Analyst
Diego Quijada, Transportation Associate

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x8 *Հայերեն (Armenian)*



Los Angeles County
Metropolitan Transportation Authority

Metro

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- By postal mail: Regional Service Councils, One Gateway Plaza, MS: 99-7-1, Los Angeles, CA 90012. *Indicate the meeting name, date, and agenda item number when submitting. Email and postal mail comments must be received by 5 pm the day prior to the meeting to ensure they will be read into the public record during the meeting. Comments received via mail or email will be read for up to two minutes per person, per item.*

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 - Press ***6** to unmute your phone line when called on for comment.

1. ROLL Call
2. APPROVE Minutes from April 9, 2025 Meeting, Councilmembers
3. RECEIVE Title VI Service and Fare Equity Policies Overview, Joanna Lemus, Senior Manager, Civil Rights Programs Comment
4. RECEIVE Station Experience Quarterly Update, Blanca Buenrostro, Facilities Maintenance Supervisor, Jorge Martinez, Principal Transportation Planner Handout Comment
5. RECEIVE Regional Updates, Joe Forgiarini, Senior Executive Officer, Nick Fox Robbins, Community Relations Manager Service Performance Handout Comment
6. RECEIVE Public comments for items not on the agenda Comment
7. CHAIR and Council Member Comments
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ADJOURNMENT

Receive Westside Central Service Council updates: servicecouncils@metro.net or 213.922.1282.

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.9200 Tel
213.922.5259 Fax
metro.net

